

**commentletters - City of San Diego Storm Water Division Comments Regarding California Ocean Plan Amendment**

**From:** "Ruth Kolb" <RKolb@sandiego.gov>  
**To:** <commentletters@waterboards.ca.gov>  
**Date:** 7/26/2007 8:11 AM  
**Subject:** City of San Diego Storm Water Division Comments Regarding California Ocean Plan Amendment  
**CC:** "Alan Langworthy" <ALangworthy@sandiego.gov>, "Beverly Morisako" <BMorisako@sandiego.gov>, "Chris Zirkle" <CZirkle@sandiego.gov>, "Tim Stebbins" <TStebbins@sandiego.gov>, <sagaylon@waterboards.ca.gov>

6/26/07 Scoping Mtg.  
CA Ocean Plan Amend.  
Deadline: 7/27/07 Noon

Good Afternoon,

The City of San Diego Storm Water Pollution Prevention Division appreciates the opportunity to comment on the Scoping Document Amendment of the Water Quality Control Plan Ocean Waters of California.

We have three questions for your consideration regarding Issue 2: Fecal Coliform Standard for Shellfish, Alternative 2.

1. If the standard is changed to 14 organisms per 100 ml of water, what is the certainty that the US Environmental Protection Agency (EPA) will modify their procedures allowing for an natural background (wildlife) exclusion? We are concerned that the limit will be reduced based on the "assumption" that EPA will approve the proposed change.
2. Please clarify where shellfish harvesting is allowed. For example, are designated state and federal wildlife refuges excluded from shellfish harvesting?
3. Please clarify where the point of compliance for monitoring purposes would be located. For example, if there is only lobster hunting/fishing during the designated season in open water that is 30 feet or deeper, is that same offshore area where the compliance samples would be collected? Additionally, would the monitoring collection period be the same as the designated hunting/fishing season?

Your consideration of these questions is greatly appreciated. If you have any questions, please contact me.

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