



You state:

*5. Implementation Provisions for SWQPAs-GP**

(5) An NPDES permitting authority may authorize non-storm water discharges to an MS4 with a direct discharge to an SWQPA-GP only to the extent the NPDES permitting authority finds that the discharge does not cause an undesirable alteration in natural water quality in an SWQPA-GP.

Comments:

We do not understand how the Permitting Authority can determine this without scientific information determining “natural water quality”.

Are you taking into consideration that aspect of stream and creek diversion because of a discharge that is questionable. Questionable because the destruction of natural flow diverts sediment that would be retained naturally. For discharges that are not monitored or do not have the requirements, there needs to be enforcement issues addressed here.

You state:

7.2 Draft text of the amendments proposed by Staff to Appendix I of the Ocean Plan

STATE WATER QUALITY PROTECTION AREAS – GENERAL PROTECTION (SWQPA-GP) designated by the State Water Board ~~to maintain natural water quality in order~~ to protect or conserve marine life and habitat from an undesirable alteration in natural water quality within State Marine Parks and State Marine Conservation Areas

Comments:

How do you establish “natural water quality” and how to you consider seasons and weather and the impacts. How does earthquake activity apply as well as volcanic eruptions or tsunamis.

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