Questions from San Diego Water Board Members
November 13, 2012 Public Workshop
on
Tentative Order No. R9-2013-0001
Regional Municipal Separate Storm Sewer Systems (MS4) Permit

Hydromodification

1. When accounting for the impacts caused by hydromodification at a development or redevelopment site, how far back should the analysis go, preproject or predevelopment? {*Grant Destache*}

2. How can the San Diego County Hydromodification Plan (HMP) be implemented into the MS4 Permit in a more succinct manner? How can we implement the rules and regulations in the San Diego County HMP, because we really have not had it in place for very long before we, "throw it down the drain?" {*Grant Destache*}

3. How do you document predevelopment or naturally occurring on a map? How is "naturally occurring" defined? How far back do you go to document predevelopment? 100 years? 500 years? Before the Indians were picking up acorns? {*Gary Strawn*}

4. Why was the concrete/hardened channel exemptions removed? {*Eric Anderson*}

5. Copermittees commented that road projects have unique space limitations and may not be able to meet retention & HMP requirements. Should road projects be treated differently and could requirements in the new CALTRANS Storm Water Permit be used to provide more options? {*Grant Destache*}

6. If a project is unable to comply with the HMP requirements at the site, how far away from the site can the project proponent place their retention basins? What other limitations exist when not placing a BMP on site? There is a concern that low income areas will become targets for placement of the retention basins. {*Tomas Morales*}

Cost

1. What is the cost of not implementing the provisions in the Tentative Order? (e.g. beach closures, ill health that taxpayers have to pay for through their private health plans or public costs, deaths ....) {*Henry Abarbanel*}

2. Lots of big cost numbers were used during the meeting. (e.g. $2 to $4 billion over 20 years) How much do the Copermittees spend now? What is being spent now and on what? {*Henry Abarbanel*}

3. What is the breakdown of costs? What is the timeframe of these costs? How much is already being spent? {*Tomas Morales*}

Total Maximum Daily Load (TMDL)

1. Can the Copermittees meet the bacteria levels that are specified in the Total Maximum Daily Loads (TMDLs)? What sorts of technologies are available to the Copermittees to treat bacteria to the levels specified in the TMDLs? {*Grant Destache*}

2. Can the Copermittees achieve adequate waste load reductions in MS4 discharges to meet the effluent limitations and compliance dates for bacteria in the Tentative Order? {*Grant Destache*}

3. What are the benefits of BMP based compliance with the TMDLs for bacteria compared to compliance with Water Quality Based Effluent Limitations (WQBELs)? {*Grant Destache*}

4. Address the issues that Ruth Kolb, City of San Diego raised regarding the Bacteria TMDLs. Clarify how we incorporated the Bacteria TMDLs into the Tentative Order to demonstrate that we incorporated it into the Tentative Order the way it was intended to be implemented. {*Eric Anderson*}

5. Throughout the presentations, it was said that it is infeasible to cleanup bacteria. Provide an explanation as to why, it is not the case, that cleanup of bacteria is infeasible. IN OTHER WORDS… Explain why it is in fact feasible to cleanup bacteria. Is it feasible to cleanup bacteria to the levels in the TMDLs? {*Tomas Morales*}

Other

1. Clarify if the Tentative Order is a one size fits all approach. Is the Water Quality Improvement Plan a one size fits all approach? {*Grant Destache*}

2. Further explain the Illicit Discharge Detection and Elimination requirement in Provision E.2.a.(1) and (3) of the Tentative Order that pertains to discharges from footing drains and fountain drains. {*Eric Anderson*}