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To: "Connie Anderson" <CSAnderson@waterboards.ca.gov>
Date: 3/30/2010 5:34 PM
Subject: ASBS Exception comments

Connie - Additional review by CCC staff will be forthcoming at the next opportunity for comments on the General Exception. In the mean time, I have the questions and comments below. Thanks for the opportunity to comment. Jack

Page B-2

It appears from the definition on page B-2 that the term "non-storm water discharges", only refers to discharges from an MS4 or other permitted storm drain system. Is that correct?

If so, then I assume that natural ground seeps that do not pass through a storm drain are not considered to be "non-storm water discharges". Correct?

Page B-6

It appears that you are distinguishing nonpoint source waste discharges from other nonpoint source discharges (e.g. stormwater runoff that does not pick up any waste and does not discharge through a point source). Is that correct?

Page B-16

Section 3.a: After reading this Section 3.a and the Glossary a few times, it appears that additional monitoring is required for marinas (with 10 or more slips), boat launches, piers and for mooring fields (with 10 or more moorings). Is that correct? Does the schedule for monitoring of mooring fields (in 3.a.(1) and (2)) apply to marinas, boat launches and piers too?

Glossary

Design storm: In current NPDES stormwater permits the design storm factor varies along the California coast due to changes in precipitation. What is the basis for using one(1)inch as the design storm for the whole coast? Will this basis be used in the future for stormwater permits?

LID - while ideally LID management practices can benefit water supply, they are sometimes used to reduce runoff in areas that do not benefit water supply. You may want to find a more generic definition.

Natural water quality: last sentence:

It is not clear in the sentence with the phrase "sufficient information must include...whether runoff sample data compared to the reference area" is to be considered with or without a dilution factor. Please clarify.

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