Darcy, Stuart and Ashli –

Please find attached the San Diego Water Board Comments on the Draft B.2 Executive Summary. Below is a general summary of the concerns on the Plan’s compliance with the B.2 Provision. Specific comments are made on the attached word document. On Monday I will forward to you our checklist that we use for review and determination of Plan compliance to assist you in your B.2 submittal. I may have additional comments on Monday but these are the ones of most concern:

1. General comment: This process identified in Provision B of the permit is the development of a compliant watershed plan for a storm water permit. Provision B.2 requires that the assessment and identification of priority water quality conditions and high priority water quality conditions be based on impacts to receiving waters beneficial uses in the watershed management area. As I discussed previously, the Plan must have both wet and dry PWQCs and HPWQCs.

2. High Priority Water Quality Conditions (HPWQCs) assigned solely to jurisdictions in a Plan submitted to the San Diego Water Board will not be in compliance with Provision B.2 of the permit. HPWQCs are required, and intended, by the Permit to be assigned to watersheds and/or subwatersheds. The current approach circumvents the purpose of the development of the Plan for the Santa Margarita River Watershed Management Area.

3. Exclusion of the City of Menifee and the Riverside County Flood Control and Water Conservation District (RCFCD) from the HPWQC selection process will not be in compliance with provision B.2 process or the Permit. Menifee is required under provision B.1 and the October 26, 2015, agreement to participate preparation and implementation of the Plan. The Plan must include RCFCD and address the applicable B.2 impacts, causes and contributions from the RCFCD facilities. This includes consideration of those pollutant sources and stressors identified in B.2.d (1), B.2.d(2) and B.2.d(3) for the selection of the PWQCs and HPWQCs.

4. As I discussed during the initial Consultation Panel Committee meeting, the list of potential strategies provided does not have a clear connectivity to how they impact the claimed pollutants. The majority of the strategies listed in the table are vague non-structural BMPs and are not in compliance with B.2.e. The development of the strategies under B.2.e are required to clearly demonstrate resultant improvements to water quality in MS4 discharges and/or receiving waters in the WMA. The strategies need to be measurable.
5. While it is not a requirement to provide the Consultation Panel with a complete draft of the formal B.2 submittal for review and comment, the Consultation Panel must have enough information to provide meaningful comments on the proposed Plan approach, PWQCs, selection of the HPWQCs, and proposed strategies. The selection process of the HPWQCs must be clear. This draft appears to be missing underlying information (graphics and/or tables) to assess the basis of statements and the areas and selection of the HPWQCs.

Regards,

Erica Ryan, CPSWQ
QSD/QSP/CISEC/ToR CGP
QISP/ToR IGP
Water Resource Control Engineer
Storm Water Management
San Diego Water Board

2375 Northside Drive, Suite 100
San Diego, CA 92108
Direct Phone: (619) 521-8051
Main Line: (619) 516-1990
Fax No. (619) 516-1994
Email: Erica.Ryan@waterboards.ca.gov

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
SAN DIEGO REGIONAL WATER QUALITY CONTROL BOARD
www.waterboards.ca.gov/sandiego/