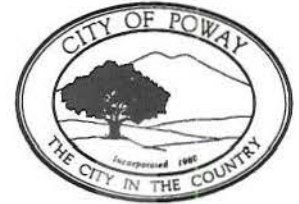


CITY OF POWAY



DON HIGGINSON, Mayor
JOHN MULLIN, Deputy Mayor
JIM CUNNINGHAM, Councilmember
DAVE GROSCH, Councilmember
STEVE VAUS, Councilmember

January 9, 2013

California Regional Water Quality Control Board, San Diego Region
Attn: Wayne Chiu, P.E.
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

**RE: Comment -Tentative Order No. R9-2013-0001
Regional MS4 Permit, Place ID: 786088Wchiu**

SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD
2013 JAN 10 AM 11 29

Dear Wayne,

The Priority Development "cutoff" levels don't appear to have a link to soil types, which greatly impact the amount of runoff. A site with Type A soil ("Site A") retains a large portion of rainwater naturally, and has a small amount of runoff. Adding 5,000 square feet (SF) of impervious surface to "Site A" massively increases the amount of runoff compared to the natural condition because the water that previously soaked into the ground now runs off. Compare this to a site of equal size and slope but with Type D soil ("Site D"). In its natural condition very little water is retained by soaking into the ground due to the tight soil matrix and rock. Adding 5,000 square feet of impervious surface to "Site D" only slightly increases runoff from the site, since the site was nearly impervious in its natural condition. The permit should reflect this basic hydrologic tenant, and have stepped cutoff, such as: 5,000 SF for A soils, 6,000 SF for B, 7,000 for C, and 9,000 SF for D. This would more accurately reflect the increase in runoff from sites with differing soils.

Suggested language:

II.E.b.(2)(a)

New development projects that create ~~10,000 square feet or more~~ of impervious surfaces (collectively over the entire project site) based on the following soil types:

- Type A soil = 10,000 square feet or more
- Type B soil = 12,000 square feet or more
- Type C soil = 14,000 square feet or more
- Type D soil = 16,000 square feet or more

This category includes commercial, industrial, residential, mixed-use, and public development projects on public or private land which fall under the planning and building authority of the Copermitttee.

II.E.b.(2)(g)

Streets, roads, highways, freeways, and driveways. This category is defined as any paved impervious surface that is ~~5,000 square feet or more~~ used for the transportation of automobiles, trucks, motorcycles, and other vehicles that meet the following criteria:

- Type A soil = 5,000 square feet or more
- Type B soil = 6,000 square feet or more
- Type C soil = 7,000 square feet or more
- Type D soil = 9,000 square feet or more

City Hall Located at 13325 Civic Center Drive

Mailing Address: P.O. Box 789, Poway, California 92074-0789

www.poway.org

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Wayne Chiu, P.E.
Comment – Tentative Order No. R9-2013-0001
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Compliance

Develop language to clearly link WQIPs to Permit compliance.

TMDLs

Add options for BMP - and load-based compliance with WLAs. Insert language in *Modification of Programs* (Provision H) to reopen Permit to incorporate TMDL revisions and CLRP modifications.

Hydromodification Management Plan

Reaffirm Resolution R9-2010-0066; reference the Resolution in the permit.
Replace “pre-development naturally occurring” with “pre-project”.

Should you have questions, you may contact me via email at sstrapac@poway.org or by phone at (858) 668-4653.

Sincerely,

DEVELOPMENT SERVICES DEPARTMENT



Steven E. Strapac, P.E., P.L.S.
Senior Civil Engineer

c: Steve Crosby, P.E., City Engineer
Roger Morrison, Management Analyst