

EXECUTIVE OFFICE SUMMARY REPORT
October 11, 2017

- ITEM NO: 8
- SUBJECT: Public Hearing: Regulated Small MS4 Designation: A Resolution Designating Marine Corps Recruit Depot (MCRD) San Diego as a Regulated Small Municipal Separate Storm Sewer System (MS4) Subject to State Water Resources Control Board Order No. 2013-0001-DWQ, National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000004. (Tentative Resolution No. R9-2017-0106). (*Tony Felix*)
- PURPOSE: To receive public testimony, if any, and consider adoption of the revised Tentative Resolution No. R9-2017-0106 (Tentative Resolution).
- RECOMMENDATION: Adoption of the Tentative Resolution with proposed revisions (**Supporting Document No. 1**) is recommended.
- KEY ISSUES:
1. The Tentative Resolution designates MCRD San Diego as a Regulated Small MS4¹ because discharges from its MS4 system have the potential to result in exceedances of water quality standards and other significant water quality impacts.
 2. Upon adoption of the Tentative Resolution, MCRD San Diego will be required to apply for coverage under the statewide Water Quality Order No. 2013-0001-DWQ, *Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems* (Phase II General Permit) or an individual NPDES permit within 180 days.
 3. The Tentative Resolution includes a request that the Executive Director of the State Water Resources Control

¹ A Small MS4 is an MS4 that is not permitted under the municipal Phase I regulations, and which is “owned or operated by the United States, a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity....” (40 CFR section 122.26(b)(16)).

Board (State Water Board) amend Attachment B of the Phase II General Permit to include MCRD San Diego. Attachment B is a statewide listing of non-traditional Small MS4 dischargers that are required to comply with the Phase II General Permit. The Executive Officer will forward the request to amend Attachment B to the State Water Board following adoption of the Tentative Resolution.

PRACTICAL VISION: The San Diego Water Board in serving as a steward of the public trust in protecting and restoring the waters of the San Diego Region, accomplishes these goals through its Practical Vision entitled *Healthy Waters, Healthy People*. By designating MCRD San Diego as a Regulated Small MS4 and requiring enrollment under the Phase II General Permit, MCRD San Diego will be required to develop and implement programs and practices that are effective in reducing or eliminating discharges of pollutants in storm water runoff into and from their MS4s. Consistent with the goals of the Practical Vision, MCRD San Diego compliance with Phase II General Permit requirements will provide a firm regulatory foundation for reducing adverse impacts to water quality and aquatic habitat within San Diego Bay and for achieving improvements in water quality.

DISCUSSION: MCRD San Diego is a federally owned military installation located in San Diego, California, approximately 2.4 miles west of the City of San Diego, north of the San Diego International Airport, and east of the former Naval Training Center (NTC) San Diego. **(Supporting Document No. 2)**. MCRD San Diego is centered on “Making Marines” and primarily provides the facilities to support the Recruit Training Regiment. The mission of the Recruit Training Regiment is to provide reception, processing, and recruit training for enlisted personnel following initial entry into the Marine Corps and to provide the training for drill instructors and officers entrusted with recruit training responsibilities.

MCRD San Diego covers 505.2 acres including a portion of an open boat channel (Boat Channel) separating MCRD San Diego and the former NTC San Diego. MCRD San Diego is comprised of administration and industrial buildings, roads, parking lots, a large paved parade field, open fields for recreation and recruit training, and landscape areas. Storm water and non-storm water discharges are generated from parking lots and streets, landscaped areas, fire hydrant flushing, gasoline service stations, parade and training grounds, and loadings docks.

MCRD San Diego's enrollment and compliance with the Phase II General Permit is intended to further reduce or eliminate adverse impacts to water quality and aquatic habitat through the use of required controls on storm water discharges. Under the Phase II General Permit, MCRD San Diego will be required to develop and implement a Storm Water Management Plan (SWMP) that contains detailed best management practices (BMPs) and specific level-of-implementation information addressing the following six minimum control measures to protect water quality:

1. Education and outreach
2. Participation/involvement
3. Illicit discharge detection and elimination
4. Construction site runoff control
5. Post-construction runoff control, *and*
6. Pollution prevention/good housekeeping for municipal operations

When implemented together, these six minimum measures are expected to reduce or eliminate MCRD San Diego's pollutant loads to waterbodies. The Phase II General Permit provisions establish compliance implementation levels such as escalating enforcement and requirements for tracking projects. Required actions include specific reporting elements to substantiate compliance with implementation levels. The San Diego Water Board will be able to evaluate MCRD San Diego's compliance through Annual Report review and the program evaluation (audit) process.

MCRD San Diego does not discharge pollutants to San Diego Bay within the reach of any adopted Total Maximum Daily Loads (TMDLs).

On April 7, 2015, the State Water Board amended the statewide Water Quality Control Plans to address the pervasive impacts trash has on the beneficial uses of the State's surface waters (Trash Provisions). The Trash Provisions establish statewide narrative water quality objectives providing that trash shall not be present in surface waters and prohibitions of trash discharge to surface waters or trash deposition where it may be discharged into surface waters. The Trash Provisions required the State Water Board to initiate implementation of trash controls by June 2, 2017, through an amendment to the Phase II General Permit or through monitoring and reporting orders issued pursuant to Water Code sections 13267 or 13383. For newly designated Regulated Small MS4s, the State Water Board will issue Water Code section 13383 Orders upon designation. Newly designated Regulated Small MS4s must achieve full compliance with the Trash Provisions within 10 years of the

effective designation.

The Tentative Resolution was noticed and released for formal public review and comment on August 7, 2017. No comment letter on the Tentative Resolution was received from MCRD San Diego. One comment letter was received from the San Diego County Regional Airport Authority requesting that Finding 19 of the Tentative Resolution include a revision stating, "Additionally, two other storm drains owned by San Diego County Regional Airport Authority originate on airport property but run through MCRD San Diego and discharge to the Boat Channel." (**Supporting Document No. 3**). This revision was made and is displayed in the revised Tentative Resolution as red-underline for added text and red strikeout for deleted text.

LEGAL CONCERNS: None

COMPLIANCE RECORD: The Tentative Resolution seeks to designate MCRD San Diego as a new Regulated Small MS4 under the Phase II General Permit; therefore MCRD San Diego does not have a compliance record pertaining to the Phase II General Permit.

SUPPORTING DOCUMENTS:

1. Revised Tentative Resolution No. R9-2017-0106
2. Location Map
3. San Diego County Regional Airport Authority Comment Letter
4. Public Comment Period and Hearing Notice

PUBLIC NOTICE: The Tentative Resolution was noticed and released for formal public review and comment on August 7, 2017. (**Supporting Document No. 4**). The public notice and the Tentative Resolution were posted on the San Diego Water Board website on August 7, 2017. The release for public review and comment also included an email sent to the Copermittees of the San Diego Bay Watershed Management Area, Port of San Diego, and City of San Diego on August 7, 2017.