



January 24, 2008

Jeremy Haas
San Diego Regional Water Quality Control Board

RE: Comments on Tentative Order No. R9-2008-0001

Dear Mr. Haas,

Please accept the following comments regarding proposed language found on page 32, Section 1 a and c of Tentative Order No. R9-2008-0001.

Rather than removing ineffective BMPs and adding LID BMPs, the SUSMP BMP list should be updated to reflect new information about pollutant removal and water quantity management capabilities of BMPs as is demonstrated in field tests and laboratory tests. Efforts must be made to link the performance of the BMPs to specific design criteria. It is important that we move beyond associating a particular BMP type or class with a particular effectiveness. This is a useful first screening approach for BMP selection, but the actual performance of most BMPs is highly dependent on their particular design and size in relation to the flow rate or volume treated.

To illustrate the point, consider that Table 7-II-6, "Treatment Control BMP Selection Matrix" in the current Orange County DAMP groups similar technologies together and credits them with the same level of effectiveness regardless of specific designs. For example, grass swales, wetland vegetation swales, grass strips and bioretention are all grouped in the same biofilter category with the same capabilities. Surely a true bioretention area that collects and infiltrates water through natural or amended soil to reduce or even eliminate runoff would be better performing than a typical swale which may have little infiltrative capacity and sparse vegetation.

Proprietary systems also vary dramatically in design and sizing strategies. For example, catch basin inserts are often referred to as filters, as are cartridge based filters. The difference in performance and cost between these technologies can be dramatic. These differences should not be ignored. On the contrary, they should be investigated and captured in subsequent SUSMP iterations. This permit should require that BMP specific pollutant and water quantity reduction assessments be included in updates to the SUSMP. These updates would take the form of minimum design standards for BMPs that must be met in order for those BMPs to be credited with the assumed performance level. Minimum design standards for LID BMPs should also be developed.

Several efforts designed to collect the kind of information that is needed to make these kinds of BMP specific assessments are underway. Notable resources include the International Stormwater BMP Database, the Caltrans Stormwater Treatment Technology Report, the Washington State Department of Ecology, the New Jersey Department of Environmental Protection and the University of New Hampshire.

www.contechstormwater.com





I encourage you to consider incorporating information from these resources, and other local field monitoring projects and data collection efforts to develop more specific BMP performance estimations in future SUSMP updates.

Sincerely,

A handwritten signature in black ink, appearing to read "Vaikko", written over a light gray rectangular background.

Vaikko Allen II, CPSWQ
Regulatory Relations Manager - West

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