





- The Notice of Intent contains open-ended requirements for certification of alternate methods of disposal or re-use. Potable water systems are already required to operate under strict Best Management Practices (BMP's) to limit water loss due to leakage, upset, and maintenance discharges. No additional regulation is needed
- The requirement to obtain approval from each MS4 operator, prior to every discharge, places unreasonable burden on water agencies. The added complexity and cost is not justified for such low risk discharges, and the process could jeopardize projects that require dewatering operations.
- Hydrostatic testing of new oil and gas facilities and reclaimed water systems have been included in this permit. This adds unrelated groups with the potential of higher risk discharges to the permit.
- Discharge of water into water conveyance systems is no longer exempt under the new proposal. Water discharged into a potable water source poses no risk to the public or environment.

In additional to the major issues listed above, the committee has other items of concern that we feel should be addressed.

Adoption of the Order, in its present form, will severely impact the ability of public water agencies in San Diego County to properly operate and maintain our systems.

The Water Authority and its 24-member agencies respectfully request delaying adoption of the Draft Tentative Order, and request stakeholder advisory group meetings and/or workshops as part of the rule-making process. This will allow time for TAC members and RWQCB staff to work toward mutually acceptable solutions, prior to permit adoption. If you have any questions, please contact Joe Wegand, Operations and Maintenance Manager, at (760) 233-3264 (office) or (760) 644-1411 (cell).

Sincerely,



Gary Eaton  
Director of Operations and Maintenance

JNW:sdw/cao

Cc: Joe Wegand, O&M Manager, Water Authority  
Frank Belock, Deputy General Manager, Water Authority  
Ken Weinberg, Director of Water Resources, Water Authority

