

ASBS Special Protections
Storm Water and Nonpoint Source Discharges
Scoping Meeting
Outline of Comments and Suggestions
August 1, 2006 Meeting

- **Special Protections - General**
 - Clarify discharge types (e.g. different discharges that would/would not be allowed).
 - Alternative: Strike “firefighting”, potential violation portion of emergency procedures.
 - Alternative: Inadequate maintenance not an excuse for an emergency.
 - Evaluate existing Phase 1 & 2 CalTrans list.
 - Comment: Vessel waste associated with hulls (paint, etc).
 - Alternative: Upstream discharges covered by special protections.
 - Alternative: Allow new outfalls if they do not contribute to waste discharge.
- **Special Protections – Enforcement**
 - Comment: How does Crystal Cove apply?
 - Clarify enforcement process (State and Regional Boards).
 - Comments: State Board to send a letter to dischargers informing them that their packages have been completed.
 - Alternative: Drop requirement of justification for not submitting application in a timely matter.
- **Monitoring**
 - Alternative: Adaptive monitoring during the first five years for cost effectiveness.
 - Comment: Consistency in data collection.
 - Comment: Partial/non participation in monitoring programs.
 - Alternative: Drop natural water quality in lieu of California Ocean Plan Table B.
 - Address variability in storm water related to natural water quality.
 - Alternative: Drop natural water quality in lieu of California Ocean Plan Table C.
 - Comment: Use caution in determining reference site.
 - Comment: Clarify natural water quality definition and Table B.
 - Comment: Strengthen potential for statewide monitoring reference conditions.
- **Time Schedule Order**
 - Clarify term “order.”
 - Alternative: Time schedule for compliance.
- **Storm Water Management Plan**
 - Alternative: Address time schedule order for nonpoint source.

- Alternative: Performance standard must be met and include proof of interim progress, though the progress should not be based on individual discharges.
- Alternative: Flexibility in time schedule order deadline.

- **Additional Comments**

- Include as nonpoint source silver culture.
- Include process for Regional Board notification for those not otherwise notified.
- Priority on impaired ASBS.
- Include economics of monitoring (cost).
- Evaluate effects of monitoring on reference streams.
- Include blue ribbon panel merits report.
- Define criteria for determining reference creek, including consideration of impaired water bodies.
- Alternative: Include definitions page with the document.
- Alternative: Include graphic to help with definitions.