

# San Diego Regional Stormwater Copermittees Regional Program Planning Subcommittee

## *Meeting Notes*

Co-Chairs Todd Snyder and Jon Van Rhyn

Date	Location	Agenda Summary
10/17/2012 Start time: 1:30 PM End time: 3:30 PM	County of San Diego Medical Examiner's Bldg 5570 Overland Ave San Diego, CA	<ul style="list-style-type: none"> <li>Strategies for 10/24 Focused Meeting</li> </ul>

### Meeting Attendance:

Number of Voting Copermittees at this Meeting: 9

#### VOTING MEMBERS

<input checked="" type="checkbox"/> City of Carlsbad <b>Elaine Lukey</b>	<input checked="" type="checkbox"/> City of El Cajon <b>Jaime Campos</b>	<input checked="" type="checkbox"/> City of Escondido <b>Cheryl Filar</b>	<input type="checkbox"/> City of Lemon Grove
<input checked="" type="checkbox"/> City of Oceanside <b>Cynthia Mallett</b> <b>Alison Witheridge</b>	<input checked="" type="checkbox"/> City of Poway <b>Steve Strapac</b>	<input checked="" type="checkbox"/> City of Vista <b>Paul Hartman</b>	<input checked="" type="checkbox"/> Port of San Diego <b>Allison Vosskuhler</b>
<input checked="" type="checkbox"/> City of San Diego <b>Drew Kleis</b>	<input checked="" type="checkbox"/> County of San Diego <b>Jon Van Rhyn</b> <b>Todd Snyder</b>	<b>Scott Norris</b> <b>Jo Ann Weber</b>	<b>Sheri McPherson</b>

#### NON-VOTING MEMBERS

<input checked="" type="checkbox"/> City of Chula Vista <b>Khosro Aminpour</b>	<input checked="" type="checkbox"/> City of Coronado <b>Rosanna Lacarra*</b>	<input checked="" type="checkbox"/> City of Del Mar <b>Mikhail Ogawa*</b>	<input checked="" type="checkbox"/> City of Encinitas <b>Erik Steenblock</b>
<input checked="" type="checkbox"/> City of Imperial Beach <b>Chris Helmer</b>	<input checked="" type="checkbox"/> City of La Mesa <b>Joe Kuhn</b>	<input checked="" type="checkbox"/> City of National City <b>Arsalan Dadkhah*</b>	<input type="checkbox"/> City of San Marcos
<input checked="" type="checkbox"/> City of Santee <b>Julie Procopio</b>	<input checked="" type="checkbox"/> City of Solana Beach <b>Taryn Dunbar</b>	<input checked="" type="checkbox"/> Airport Authority <b>Richard Gilb</b>	<input checked="" type="checkbox"/> Secretary <b>Hilary Potter</b>

\*Indicates consultant representing copermittee

### 1. Introductions and Announcements

Copermittees introduced themselves.

### 2. Administrative Issues

Invoices for the FY 2012-13 shared cost budget were sent out yesterday.

### 3. Strategies for 10/24 Focused Meeting

As the redline administrative draft permit was posted October 12, 2012, today's meeting will initiate discussion on permit reissuance issues, but is not expected to result

in completely formed strategies for the October 24 MS4 Focused Meeting. The next PPS meeting will be held Tuesday, October 23, 2012, in the afternoon, and strategies will be finalized then.

Todd Snyder (County of San Diego) expressed low confidence in having significant revisions to the redline administrative draft permit result from the October 24 MS4 Focused Meeting, as the Regional Water Quality Control Board (RWQCB) is anticipating release of the draft permit one week later on October 31, 2012. In preparation for the focused meeting, therefore, the Copermittees need to consider which comments or issues are of highest importance and which comments or issues could be easily revised by the RWQCB in one week.

#### **A. Discharge Prohibitions and Limitations**

The redline administrative draft permit did add text that attempts to meet the Copermittees' submitted revisions and comments, but does not incorporate the exact language provided by the Copermittees and does not fully provide protection from third party liability issues. The general consensus was this issue will not be resolved at the regional level; it will need to be covered at the State level and then passed down to the RWQCBs. The Attorneys' Group, however, should still review the language and provide feedback and revised language, if recommended, to the PPS at Tuesday's meeting.

Drew Kleis (City of San Diego) provided his understanding of Heather Stroud's initial reaction to the revised language. The redline administrative draft permit in its entirety now does address the iterative process in Provision B with reference back to Provision A. It still does not provide liability protection from third party lawsuits, but it does start to address how the RWQCB would address and enforce exceedances. The Copermittees may have the opportunity to wordsmith how the RWQCB is addressing that enforceability. The third party liability issue will need to be resolved at the State level. Drew Kleis (City of San Diego) shared that Chris Minton (LWA) and Dustin Bambic (Tetra Tech) are drafting a short position paper recommending a potential strategy to address prohibitions and limitations. This position paper will be provided to the Attorneys' Group and could provide initial thoughts to work from. The position paper will not provide revised language, only conceptual thoughts.

Todd Snyder (County of San Diego) and Drew Kleis (City of San Diego) suggested the Los Angeles permit language may be the preferred recommendation. The San Diego redline administrative draft permit does not state that implementation of the Water Quality Improvement Plan constitutes compliance. The Los Angeles permit states that Copermittees are compliant if implementing their Water Quality Improvement Plans and if the Water Quality Improvement Plans are designed to achieve ultimate water quality standards. In side conversations with Cindy Lin (US EPA), she also has

recommended the San Diego Copermittees review the Los Angeles permit on this language.

Although the RWQCB indicated at previous focused meetings that legal issues would not be discussed, they have allotted 45 minutes for discussion of discharge prohibitions and limitations; therefore, it may be advantageous to have attorney representation at the October 24 MS4 Focused Meeting in case legal issues are raised and discussed.

The State Water Resources Control Board (SWRCB) is having a workshop on November 20, 2012, to address the receiving water / third party liability issue. Comments for that workshop are due by November 13, 2012. Todd Snyder (County of San Diego) suggested the Copermittees send in comments on the issue. Details will be discussed at Tuesday's PPS meeting.

How the Copermittees are managing consultant support for this round will also be discussed at Tuesday's PPS meeting, after the workgroups have had an opportunity to meet this week, review the redline administrative draft permit, and provide input to the PPS.

#### **B. TMDL Implementation**

Todd Snyder (County of San Diego) shared that the County will be requesting the Rainbow Creek TMDL to be removed from the permit, as it does not have waste load allocations. Other Copermittees with TMDLs mentioned they have not yet reviewed the TMDL section of the redline administrative draft permit.

For the bacteria TMDL, the County circulated a letter that went to the Board of Supervisors at the end of September. The letter estimated the cost for implementation of the TMDL requirements, which was in the billions of dollars range. As a result, the Board of Supervisors will attend the November 13 San Diego RWQCB workshop and request the TMDL for bacteria not be included in the permit since the wet weather standards are not achievable based on current technology and the dry weather standards are not sufficiently backed by scientific data. The lack of scientific data is the reason the Copermittees are completing special studies and had advocated a reopener be included in the TMDL. If the TMDL is included in the permit, then the permit should include language that the TMDL is not enforceable until after the TMDL has been reopened, which is scheduled for 2016.

Drew Kleis (City of San Diego) shared that the City, with assistance from AMEC is looking at what studies need to be completed for the TMDL and expects to have a listing completed in early to mid-November. He suggested a compromise: instead of removing the bacteria TMDL from the permit, include the TMDL in the permit with a list of studies that need to be completed to provide sufficient scientific data and when the studies are completed, the TMDL will be reopened.

Todd Snyder (County of San Diego) is unsure if County staff would be cleared to suggest such a compromise as it differs from the stance that the Board of Supervisors will be voicing at the November 13 workshop. He will check with management and inform the PPS on Tuesday of the direction he receives from management.

**C. Monitoring**

Jo Ann Weber (County of San Diego) presented her initial thoughts on the redline administrative draft permit. The RWQCB did agree with the Copermittees' recommendations for receiving water monitoring, cutting it down to once every 5 years; however, during the transition period the Copermittees will have to maintain current requirements, so there will be a long list for the first couple of years. On other items, the RWQCB did not agree with the Copermittees' recommendations.

For MS4 Outfall wet weather monitoring, the Copermittees recommended 3 sites per watershed management area (WMA). The redline administrative draft permit requires 5 sites per WMA, which equates to 45 sites for the first storm monitoring. This is an issue that should be raised at the MS4 Focused Meeting.

For MS4 Outfall persistent flow, the Copermittees recommended prioritization on a WMA basis, proposing 69 at one time. The RWQCB wants to use this monitoring data for jurisdictional accountability and is requiring 10 sites per jurisdiction per WMA, which equates to 310 at one time. This is an issue that should be raised at the MS4 Focused Meeting.

In Provision E with respect to the IC/ID program, the RWQCB is pushing for inspections not only of obvious IC/IDs based on visual inspections, but also to include other things as well, such as standing water. The requirements have increased in this version of the permit.

The assessment section (Provision D.4) has changed significantly, and there are some things that are being required that cannot be done with the data that will be available.

Jo Ann Weber (County of San Diego) shared that Weston Solutions is already working on responses and recommendations for the monitoring portions of the redline administrative draft permit. Their deliverable is expected this week.

Paul Hartman (City of Vista) questioned if the assessment section presents a potential legal concern by requiring the Copermittees to include in the Annual Reports an estimate of the percent contribution from each known and suspected source for each MS4 outfall. Estimating sources and publishing those estimates in public documents may open up the Copermittees to scrutiny from third parties. The assessment section does not detail how to determine the estimated percentages. The Copermittees discussed the issue, and the general consensus was that

estimates could be included with caveats in the Annual Report and that the estimates may be of value in the long term but may not be valuable in the short term.

Paul Hartman (City of Vista) mentioned that there are a couple places in the monitoring section that include direct ties to the Water Quality Improvement Plans. Those involved in reviewing Provision B may want to look at those sections.

The Monitoring Workgroup will be meeting Thursday and Monday. Jo Ann Weber (County of San Diego) will bring the workgroup's recommendation of positions and speaking points to Tuesday's PPS meeting.

#### **D. Development Standards / Existing Development**

##### ***Existing Development***

Jon Van Rhyn (County of San Diego) reminded the Copermittees that in the previous version of the administrative draft permit, the existing development section combined industrial, commercial, municipal, and residential. The Copermittees' recommendation was to remove residential into its own section. The RWQCB did not accept the recommended language; however, they did address the Copermittee's input on every point.

At the beginning of Provision E, the Copermittees' proposed a modification to the introductory language that would clarify the adaptive management process and where changes could or could not be made. That language was not incorporated, leading to a likely conclusion that adaptation will be "upward only"; however, given the flexibility present in most areas of Section E, these draft permit provisions may be acceptable.

The Copermittees had commented that the definition of "source" was too broad and recommended substitution of the source definition as something that "...has the reasonable potential to discharge a pollutant load..." The RWQCB revised the language to state a source is something that "...may discharge a pollutant load..." Jon Van Rhyn (County of San Diego) suggested the Copermittees should continue to ask clarifying questions about this issue and would like the Attorneys' Group to provide input. This definition of a source is still subject to a wide interpretation. To establish the required inventory of sources, the Copermittees need to be able to make a determination of significance at some point. This issue should be raised at the MS4 Focused Meeting.

The RWQCB did not separate residential into its own section but did make appropriate delineations within Provision E.

Regarding the inclusion of required source categories, the Copermittees had recommended deleting everything. The redline administrative draft permit retains a

number of mandatory municipal source categories, but otherwise lays out comprehensively the major areas to include. That language is probably acceptable at this point.

The Copermittees had recommended the inclusion of residential management areas (RMAs) to define residential sources to include in the required inventory of sources. The RWQCB did include language to allow for the definition of RMAs or other delineations to inventory residential sources.

In regard to retrofitting and channel rehabilitation, the RWQCB did not accept the exact language proposed by the Copermittees; however, the overall revisions are acceptable. The redline administrative draft permit does separate channel rehabilitation from retrofitting. It also requires Copermittees to go through a process of identifying potential projects or areas for retrofit or channel rehabilitation, but does not require the Copermittees to implement the projects. This is acceptable.

The Copermittees had asked for clear delineation between Best Management Practice (BMP) requirements in general and those required for second tier sources, following the Water Quality Improvement Plan priorities. The RWQCB did not accept the Copermittees' exact language recommendations but did address the issue, making it relatively clear what is expected for the second tier sources.

For inspections, the RWQCB revised the permit to define three options for inspections: drive-bys, onsite inspections by Copermittees, and onsite inspections by pollution patrols trained by the Copermittees. Everything (industrial, commercial, municipal, and residential existing development) is still subject to inspection once in a permit cycle. The Copermittees had recommended a substitution requirement of inspecting 20% of the inventories each year, equating to 100% of the inventories being inspected over the 5-year permit period. The RWQCB included both requirements for industrial, commercial, and municipal (ICM) sources.

E.5.c.(1)(iv) states that each Copermittee must annually perform onsite inspections of an equivalent of at least 20 percent of ICM facilities and areas with a footnote that states if any ICM facilities or areas require multiple onsite inspections during any given year, those additional inspections may count toward the total annual inspection requirement. E.5.c.(1)(a)(i) generally allows for three different types of inspections to be utilized in satisfying the requirement to inspect all sources once every five years. Copermittees should review this section; this might be an issue to ask for clarification on at the October 24 Focused Meeting.

Regarding residential inspections, the requirement is the same for the frequency of inspections (once in a permit cycle). The Copermittees' choice in defining residential sources (using RMAs, drainage basin or area, land use, neighborhood, common interest area, homeowners' associations, mobile home parks and/or other

designations accepted by the RWQCB Executive Officer) will be significant in the Copermittees' ability to achieve the required inspection frequency. The Copermittees should review the language regarding definition of residential sources and required inspection frequency. Depending on interpretation, this may be a significant requirement. The lack of specificity may or may not be acceptable. This issue should be revisited at Tuesday's PPS meeting.

For Enforcement Response Plans (ERPs), the RWQCB came close to accepting all of the Copermittees' recommendations. They accepted the Copermittees' specific edits on goals for obtaining compliance and enhanced enforcement. Elaine Lukey (City of Carlsbad) inquired about the Copermittees' recommended language regarding ERPs that jurisdictions already have in place. Jon Van Rhyn (County of San Diego) replied that the redline administrative draft permit, in general, reflects the intent of what the Copermittees proposed. It essentially lays out four broad categories. There is nothing in the permit that would prevent a jurisdiction from submitting multiple existing plans under a single cover that conforms with the required categories.

Erik Steenblock (City of Encinitas) commented that the Copermittees had recommended the RWQCB move away from enhanced BMP requirements. Now, it seems they have condensed the enhanced BMP requirements into E.5.e.(1) then put retrofit and channel rehabilitation after it. The Copermittees agreed that this section needs to be reviewed in more depth.

Cynthia Mallett (City of Oceanside) referred the Copermittees to #8 under the Findings (page 2 of the redline administrative draft permit) and asked if it was in conflict with the channel rehabilitation requirements. The inclusion of channel rehabilitation requirements in an MS4 discharge permit was discussed. Drew Kleis (City of San Diego) suggested that channel rehabilitation is something that should be included in a TMDL, not in a discharge permit. The Copermittees should review this potential conflict.

Elaine Lukey (City of Carlsbad) inquired about language under the prohibitions section regarding waterline and water main breaks. Sumer Hasenin (City of San Diego) mentioned the revisions made regarding footing and foundation drains. Jon Van Rhyn (County of San Diego) suggested Copermittees review the redline administrative draft permit regarding those two issues and revisit them at Tuesday's PPS meeting.

### ***Land Development***

Sumer Hasenin (City of San Diego) explained that with the redline administrative draft permit, it is not possible to compare the Copermittees' comments and recommendations directly with the revised permit language. The Land Development Workgroup needs more time to understand the new language and determine the

significant issues. The Land Development Workgroup was, however, able to work through some of the comparisons.

The Copermittees had requested removing single-family residences (SFRs) and roadway upgrades/improvement projects from the Priority Development Project (PDP) requirements. The RWQCB did move SFRs to an exemptions section; however, they also included requirements that must be met to receive the exemption status. For example, SFRs must be LEED certified and/or meet treatment BMP requirements. The Land Development Workgroup needs to review each exemption and exemption requirements to determine if the redline administrative draft permit is making it better or worse for the potentially PDP exempt projects.

The Copermittees had requested two changes under the Hydromodification Program (HMP), which were the issues of sediment supply (which was not a critical issue) and naturally occurring conditions. The RWQCB did not incorporate either change. As previously informed by RWQCB staff, they will not be modifying the naturally occurring conditions language. The Land Development Workgroup is questioning if this might be a legal issue as to whether or not the RWQCB can require mitigation of impacts to restore to conditions prior to passage of the Clean Water Act. This issue should be considered by the Attorneys' Group.

The Land Development Workgroup is unsure if the revisions regarding the 85<sup>th</sup> percentile storm event are requiring more or less than before. The language seems to be more convoluted.

Under the alternative compliance section (Provision E.3.c.(3)), the RWQCB added a significant amount of text, including additional design options and onsite biofiltration, and they removed the infeasibility criteria. The Land Development Workgroup still needs to review the entire alternative compliance section.

#### **E. Other Topics**

##### ***Building Industry Association (BIA)***

Jon Van Rhyn (County of San Diego) talked with Mike McSweeney (BIA). The BIA will be requesting another focused meeting beyond the October 24 MS4 Focused Meeting and asked for a letter of support from the Copermittees for their request. Copermittees are to consider the request and come back with their input for a decision at Tuesday's PPS meeting.

##### ***October 24 MS4 Focused Meeting***

The format will be the same as the previous meetings. The County of San Diego Copermittees will have five seats at the table and will be able to swap persons as necessary throughout the meeting. The determination of who will start at the table



and who will attend in anticipation of swapping in at the table for the County of San Diego Copermittees will be made at Tuesday's PPS meeting.

Depending on the number and extent of issues the Copermittees intend to discuss at the meeting, it may be advantageous to contact the RWQCB to request additional time be allotted to critical issues.

Paul Hartman (City of Vista) suggested the Copermittees review the comments submitted by Coastkeeper prior to the October 24 MS4 Focused Meeting to be aware of their issues and their perspective prior to entering the meeting.

***Water Quality Improvement Plan Issues***

The redline administrative draft permit sets out a strict timeline with regard to the Water Quality Improvement Plans (Provision F.1):

Six months after permit adoption, goals and priorities must be submitted for public review, followed by a minimum 60-day public review period. The Copermittees must then revise the priority water quality conditions and numeric goals based on the comments received and/or recommendations or direction from the RWQCB Executive Officer.

Nine months after permit adoption, strategies and schedules must be submitted for public review, followed by a minimum 60-day public review period. The Copermittees must then revise the strategies and schedules based on comments received and/or recommendations or direction from the RWQCB Executive Officer.

Eighteen months after permit adoption, the complete Water Quality Improvement Plans for each WMA must be submitted. If the RWQCB determines that no public hearing or public input is required, then the RWQCB will notify the Copermittees within 6 months of plan submittal that the Water Quality Improvement Plan has been accepted as complete.

The general consensus of the Copermittees is that the Water Quality Improvement Plans are meant to be high-level planning documents. Details are to be included in the Jurisdictional Runoff Management Plans (JRMPs).

The Copermittees discussed concerns with the proposed schedule for development of the Water Quality Improvement Plans.

With permit adoption being planned for Spring 2013, the six month period for developing goals and priorities will partially fall within the current fiscal year. The Copermittees have not included development of goals and priorities in their budgets for the current fiscal year. Mikhail Ogawa (City of Del Mar) suggested adding more time upfront due to budgetary constraints and to allow significant work effort in developing the goals and priorities for the Water Quality Improvement Plans.

Although the Water Quality Improvement Plans are high-level planning documents, the Copermittees need to ensure that the details to achieve any goals and priorities can be achieved; therefore, initial development of the JRMPs is essential to development of the goals and priorities. Jon Van Rhyn (County of San Diego) commented that most Copermittees, based on knowledge from previous years, already know their priorities, but he agreed that the front end of the schedule is a bit aggressive.

Elaine Lukey (City of Carlsbad) noted that with the six month submittal, followed by a two month public review period, there is then only one month before the required nine month submittal. During that one month, the Copermittees must revise the goals and priorities, which may affect the strategies and schedules as well. The Copermittees discussed that the sequence of submittals and public review periods should be sequential, not concurrent.

Some Copermittees are concerned with the language that each submittal must be revised based on comments receiving and/or recommendations or direction from the RWQCB Executive Officer. They feel that they should be required to address comments but not required to make revisions.

The Copermittees discussed timing for having management approval of plans prior to submittal to the RWQCB. The County of San Diego and the City of San Diego typically need about 2 months to docket the items for management approval.

The schedule for submittals related to the Water Quality Improvement Plan should be a talking point at the October 24 MS4 Focused Meeting.

#### ***Jurisdictional Runoff Management Plans (JRMPs)***

Drew Kleis (City of San Diego) questioned if the redline administrative draft permit specifies the process for the RWQCB to notify Copermittees of when the JRMPs are approved by the RWQCB. Jon Van Rhyn (County of San Diego) confirmed that the redline administrative draft permit does not include language for when JRMPs are deemed approved by the RWQCB, contrary to the language included for Water Quality Improvement Plans. It states when JRMPs are required to be submitted but does not include a timeframe or mechanism for their approval. This issue will need to be clarified with the RWQCB.

#### ***Adaptive Management***

Todd Snyder (County of San Diego) commented that adaptation under the redline administrative draft permit seems to only be adaptation above the requirements. The Copermittees should review adaptive management in the redline administrative draft permit to determine if that is acceptable.

***Education and Residential Sources (ERS) Workgroup***

Cynthia Mallett (City of Oceanside) shared that the ERS Workgroup met to discuss potential permit language issues. The two primary concerns are the public participation component and assessment requirements on a jurisdictional level.

If the public participation component detailed in Provision E.7.b. is covered by the public participation required in development of the Water Quality Improvement Plans, then there is no concern. If not rolled into the Water Quality Improvement Plan public process, then there is concern of what level of effort would satisfy the public participation program component.

Regarding the assessment requirements (Provision E.7.c.(4)), the redline administrative draft permit seems to be requiring assessment at the jurisdictional level. Some jurisdictions are able to assess their education and outreach efforts, but some of the smaller jurisdictions may not be able to include assessment in their budgets. Assessment may be better suited to be done at the regional or watershed level, not jurisdictional level. There is also potential confusion because the requirement includes the terms “must” and “as-needed.”

A lesser concern from the ERS workgroup is to have Provision E.7.c.(3) state that each Copermittee could collaborate instead of should collaborate with other Copermittees.

***Regional Coordination / Principal Watershed Copermittees***

Jon Van Rhyn (County of San Diego) noted that the redline administrative draft permit has no provision for regional coordination. The Copermittees did not address this issue in the comments previously submitted. The current Memorandum of Understanding (MOU) covers one year past the adoption of the new permit. At the end of the current MOU, there currently is no mechanism for regional coordination, although there are some regional issues raised in the permit. If there are upfront priorities where regional coordination would be a benefit, then as it stands now, those need to be covered the first year under the new permit unless other arrangements are made. There is mention of coordination under Provision G.2.d. which may be the closest indication of regional coordination in the permit. This issue will need to be discussed further.

Julie Procopio (City of Santee) inquired about Provision G.1 which states that an individual Copermittee should not be designated a Principal Watershed Copermittee for more than two Watershed Management Areas. The Copermittees had requested that limitation be removed. Jon Van Rhyn (County of San Diego) clarified that “should not” is the key language.

**Draft Permit Comment Period**

Drew Kleis (City of San Diego) requested the Copermittees consider the timeline for comments on the draft permit. If it is released October 31, 2012, as planned, then the 60-day review period would be over at the end of December, which is not an optimal time period for completing comments. Eric Becker (RWQCB) has indicated the RWQCB may be flexible to extending the public comment period. The Copermittees should consider if more time should be requested, how much time should be requested, and how to request the additional review time. This issue will be discussed further at Tuesday's PPS meeting.

**4. Action Items**

Action Item		Responsible Party	Timeline
1	Review the redline administrative draft permit and submit any additional concerns or issues to Todd Snyder for discussion at the next PPS meeting.	All Copermittees	Prior to 10/23
2	Request <b>Attorneys' Group</b> review the receiving water limitations language and provide feedback and/or revised language for the next PPS meeting.	Todd Snyder (County of San Diego)	ASAP
3	Consider attorney representation at October 24 MS4 Focused Meeting	All Copermittees	10/23
4	Coordinate comments for November 20, 2012 SWRCB workshop.	Todd Snyder (County of San Diego)	Comments due 11/13 to SWRCB
5	Consider how consultant support for this round will be handled.	All Copermittees	10/23
6	Check with management regarding TMDL compromise suggestion vs. stance being taken by Board of Supervisors.	Todd Snyder (County of San Diego)	10/23
7	Bring Monitoring Workgroup's recommendation of positions and speaking points to the PPS	Joann Weber (County of San Diego)	10/23
8	In review of Provision B, also review the monitoring section portions that include direct ties to the Water Quality Improvement Plans.	All Copermittees	10/23
9	Get the <b>Attorneys' Group</b> input on source definition.	Jon Van Rhyn (County of San Diego)	ASAP

Action Item		Responsible Party	Timeline
10	Review the language regarding definition of residential sources and required inspection frequency.	All Copermittees	10/23
11	Review the enhanced BMP requirements section (E.5.e.(1)).	All Copermittees	10/23
12	Review potential conflict between Finding #8 and inclusion of channel rehabilitation in the permit.	All Copermittees	10/23
13	Review language regarding waterline and water main breaks and footing/foundation drains.	All Copermittees	10/23
14	Bring Land Development Workgroup's recommendation of positions and speaking points to the PPS	Land Development Workgroup	10/23
15	Have the <b>Attorneys' Group</b> consider the HMP naturally occurring requirement.	Attorneys' Group	ASAP
16	Consider BIA's request for asking for an additional focused meeting.	All Copermittees	10/23
17	Determine table participants for October 24 MS4 Focused Meeting	All Copermittees	10/23
18	Review comments submitted by Coastkeeper in advance of October 24 MS4 Focused Meeting	All Copermittees	10/23
19	Consider revisions to schedule of staged submittals for development of Water Quality Improvement Plans	All Copermittees	10/23
20	Review adaptive management in the redline administrative draft permit to determine if only adapting above the permit requirements is acceptable.	All Copermittees	10/23
21	Consider the issue of regional coordination past the term of the current MOU.	All Copermittees	10/23
22	Consider requesting an extension on the timeline for the public comment period on the draft permit.	All Copermittees	10/23

**5. Next Meeting**

Date: October 23, 2012  
Time: Afternoon  
Location: County of San Diego

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**FY2012-13 REGIONAL TASKS AND WORK PRODUCTS**  
**(for inclusion in Annual Report)**

<b>Working Body</b>	<b>Task/Work Product</b>	<b>Program Implementation</b>	<b>Status</b>
Regional Program Planning Subcommittee	Permit Re-issuance Support		Ongoing
Regional Program Planning Subcommittee	Regional Standards for Reporting and Assessment		Ongoing
Regional Program Planning Subcommittee	Regional Framework/Guidance for Watershed-Based Implementation Planning		Ongoing
Regional Program Planning Subcommittee	Watershed Activities Database		Ongoing