

Bernalillo County (Kali Bronson)

Notes and concerns regarding the rulemaking that may impact Bernalillo County for Petition for Regulatory Change to Adopt Amendments to 20.6.2 NMAC and New Rule 20.6.5 NMAC:

- It seems that a discharge permit is not required when covered by state or federally issued permit (point source or dredge and fill), however, have some concern that exceedances in E. coli or other pollutant concentrations in discharges could cause us to have to apply for discharge permit. Also see 20.6.2.2303.A.(4).

Notes and concerns regarding the rulemaking that may impact Bernalillo County for Dredge & Fill 20.6.2 NMAC:

- Clarification for how compensatory mitigation will be handled
- Clarification about whether dredge and fill fall under a general permit
- Clarification about size of stream that will require individual permit
- How will the exemption for return flows composed entirely from irrigated agriculture impact the county's 77 outlets to MRGCD drains? Will these require permits? Will MRGCD stop accepting stormwater discharges? How will this impact water quantity for MRGCD?

Notes and concerns regarding the rulemaking that may impact Bernalillo County for NMPDES 20.6.5 NMAC:

- How will the exemption for return flows composed entirely from irrigated agriculture impact the county's 77 outlets to MRGCD drains? Will these require permits? Will MRGCD stop accepting stormwater discharges? How will this impact water quantity for MRGCD?