

January 11, 2013

Via e-mail to wchiu@waterboards.ca.gov

San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

RE: Comments on Tentative Order Number: R9-2013-0001

Dear Mr. Chiu:

Friends of Rose Canyon, Friends of Rose Creek, and the Rose Creek Watershed Alliance respectfully submit the following comments on the draft San Diego Regional Municipal Separate Storm Sewer System permit.

We have been working together to implement some aspects of the Rose Creek Watershed Opportunities Assessment, a plan whose goal is to enhance and preserve the Rose Creek Watershed (www.rosecreekwatershed.org). Urban runoff is the San Diego region's most urgent pollution problem and was identified in the Assessment for action. Arguably, it is the most difficult to solve. In a region known for its beaches and strong tourism economy, polluted runoff makes our beaches and waterways unsafe for swimming, fishing and other recreation for at least 72 hours after a rain event. Even in dry weather, our "urban drool" from residents and businesses overwatering lawns becomes a major pollution source.

The good news is that by working together as a community, we can solve this challenging public health problem. The Water Quality Improvement Plans proposed in the draft permit have the potential to become powerful tools to help us improve water quality within our watersheds. However, the Copermittees cannot be tasked with creating these plans alone. Specifically:

- The Permit should require formation of a stakeholder advisory group for each watershed that includes representatives of environmental and community groups with knowledge of the watershed.
- These stakeholder advisory groups should work closely with the Copermittees and a regional board staff member while the Water Quality Improvement Plans are being developed to ensure that these plans aggressively pursue water quality gains.
- The stakeholder advisory process should include accountability and measurable milestones to ensure the goals of the Permit are being met.

By taking advantage of the knowledge and resources of diverse stakeholders like municipalities, businesses and residents, our region can be on the cutting-edge of addressing urban runoff and creating healthier communities and watersheds.

Friends of Rose Canyon, Friends of Rose Creek, and the Rose Creek Watershed Alliance recognize the challenge urban runoff presents to our region. We look forward to participating in a Water Quality Improvement Plan development process for the Rose Creek watershed in the city of San Diego.

Wayne Chiu, San Diego Regional Water Quality Control Board
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We urge the Regional Board to enhance the stakeholder participation opportunities during Water Quality Improvement Plan development.

Respectfully submitted,



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