January 11, 2013

Via e-mail to wchiu@waterboards.ca.gov & hand delivery
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:

San Diego Coastkeeper and the Building Industry Association of San Diego County respectfully submit the following joint comments on the draft San Diego Regional Municipal Separate Storm Sewer System permit, Tentative Order No. R9-2013-0001.

- The Water Quality Improvement Planning process should have more robust stakeholder input.

- Each Water Quality Improvement Plan should have a stakeholder advisory group that sits in Water Quality Improvement Plan meetings, consisting of an environmental representative with knowledge of the watershed, an independent engineer/hydrologist/scientist, and a regional board staff member.

- Water Quality Improvement Plans should be done consecutively, starting with the worst watershed first.

- Because infiltration may not be feasible everywhere in San Diego County, reasonable "off-ramps" for infiltration requirements are appropriate.

- The Water Quality Improvement Plan development process must solicit and include a menu of alternative compliance options developers could use within a watershed.

- Copermittees should create and publish a schedule of public input opportunities for Water Quality Improvement Plans.

- The Permit should specify that Copermittees must accept quality-controlled data received from third parties provided that the data has been development in conformity with the latest version of Standard Methods of Water and Waste Water Analysis.
Respectfully submitted,

Jill Witkowski     Borre Winckel
Waterkeeper       President & CEO
San Diego Coastkeeper     BIA San Diego