

From: [Jessica Toth](#)
To: Chiu, Wayne@Waterboards
Subject: Comments on Tentative Order No. R9-2013-0001
Date: Tuesday, January 08, 2013 12:55:28 PM

January 8, 2013

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:

Curious Company respectfully submits the following comments on the draft San Diego Regional Municipal Separate Storm Sewer System permit, Tentative Order No. R9-2013-0001.

Urban runoff is the San Diego region's most urgent pollution problem. 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 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 Co-permittees 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 groups with knowledge of the watershed.
- * This stakeholder advisory group should work closely with the Co-permittees and a regional board staff member while the Water Quality Improvement Plans are being developed to ensure these plans aggressively pursue water quality gains.
- * The stakeholder advisory process should include accountability and measureable 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. But this can only be achieved if these diverse voices are impacting the planning process in a meaningful way.

Curious Company recognizes the challenge urban runoff presents to our region, and we want to do our part to solve the problem. Curious Company is interested in participating in a Water Quality Improvement Plan development process for San Dieguito Watershed.

Curious Company urges the Regional Board to enhance the stakeholder participation opportunities as Water Quality Improvement Plans are developed and then approve the permit.

Respectfully submitted,
Jessica Toth
Curious Company

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