



Surfrider Foundation San Diego County Chapter

9883 Pacific Heights Blvd, Suite D
San Diego, CA 92121
Phone: (858) 622-9661 Fax: (858) 622-9961

July 30, 2015

San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, CA 92108

Sent via email

Re: San Diego Surfrider's Comments on the SD County MS4 WQIPs

Dear Wayne Chiu, Christina Arias, and Laurie Walsh:

The Surfrider Foundation is a non-profit, environmental organization dedicated to the protection and enjoyment of the world's oceans, waves and beaches for all people, through a powerful activist network. The Surfrider Foundation has over 250,000 supporters, members, and activists and 80+ chapters in the United States. Please accept these comments on behalf of the San Diego Chapter of the Surfrider Foundation.

The San Diego Chapter of the Surfrider Foundation has been extensively engaged with the current MS4 stormwater permit, providing public comment and important input at many points throughout the process. We articulated concerns in 2013, asking that the WQIP review process be staggered for the different watershed in order to facilitate proper review and engagement. Unfortunately, that is not the case, and as such we have not been able to review each of the eight plans in detail. We have reviewed the eight plans from a high level and volunteers helped us review the Los Penasquitos plan in detail. We know through consultation with our environmental colleagues that many of our concerns are shared. To that point, we would like to support their respective comments on individual WQIPs and reiterate our shared concerns.

In general, while the eight WQIPs are very lengthy, they lack commitment and detail. As written, Surfrider is concerned that the WQIPs do not live up to their intent in the MS4 permit and will not actually accomplish clean water. Many of the water bodies in our region have not met the standards of the Clean Water Act under the previous stormwater management paradigm, and with the proposed WQIPs we do not believe we will achieve those standards with this new watershed approach. Unfortunately, at this point the WQIPs very much appear to be more of the same or "business as usual" by the copermittees.

The WQIPs fail to list numeric goals and strategies that address the highest priority pollutants. Furthermore, the WQIPs fail to demonstrate the necessary link between the chosen strategies and required outcomes in water quality conditions.

The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and enjoyment of our world's oceans, waves and beaches through a powerful activist network. Founded in 1984 by a handful of visionary surfers in Malibu, California, the Surfrider Foundation now maintains over 250,000 supporters, activists and members worldwide. For an overview of the Surfrider Foundation San Diego Chapter's current campaigns, programs and initiatives go to www.surfridersd.org or contact us at info@surfridersd.org or (858) 622-9661.



Surfrider Foundation San Diego County Chapter

9883 Pacific Heights Blvd, Suite D
San Diego, CA 92121
Phone: (858) 622-9661 Fax: (858) 622-9961

Our specific concerns regarding the Los Penasquitos WQIP are as follows:

1. pg. v: Goal: "reduce bacteria levels at Pacific Shoreline near Torrey Pines State Beach by 2031 for wet weather"

Comment: That seems a long way out. Can this be done sooner?

2. pg. vi: Strategies and Schedules:

Comments: *Include city workers in education programs (We've seen piles of clippings left in gutter after city crew mowed park)

* Strengthen education and enforcement of public use of parks/open spaces. eg. hikers and bikers need to stay on trail so don't degrade habitat and cause erosion. This might require more Rangers.

3. pg. 1-3: Jurisdiction and Responsibilities: Copermittees don't have jurisdiction over some areas like transit district, UCSD, MCAS Miramar. Plan to study potential discharges and investigate/meet.

Comment: Is there a schedule/deadlines to have meetings and address these potentially important discharge sources?

4. pg. 2-11, Table 2-1: Los Penasquitos WMA TMDLs: Lots of TMDL 'to be developed'.

Comment: Can't we at least set upper maximum based on current standards?

5. pg. 2-17, Fig. 2-3: Los Penasquitos WMA NPDES Monitoring Stations:

Comment: Only 3 monitoring stations in the whole watershed is not enough. Need stations in Carmel Valley Creek and Carroll Canyon and another station in Los Penasquitos (probably midway between existing stations) to assess impact of urban development.

6. pg. 2-22, 2.2: Determine Potential Receiving Water Impacts from MS4 Discharges: "(6) Potential Improvements in the quality of discharges from the MS4 that can be achieved":

Comment: This is confusing. The potential receiving water impact is there whether we can improve it or not. And what does 'can be achieved' mean? The knowledge and technology exist to remove pollutants.

7. pg. 2-31, 2.2.3: Priority Water Quality Condition Data Gaps: "MS4 data collected on the sub-watershed level do not directly link the outfall discharges with impairment."

Comment: We need more water monitoring stations to determine if there is a link.

"groundwater may be a contributing source"

Comment: What is the plan to figure this out? Otherwise it is convenient to blame groundwater.

8. pg. 3-3, Fig. 3-1: Highest Priority Water Quality Conditions Source Identification Process:

The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and enjoyment of our world's oceans, waves and beaches through a powerful activist network. Founded in 1984 by a handful of visionary surfers in Malibu, California, the Surfrider Foundation now maintains over 250,000 supporters, activists and members worldwide. For an overview of the Surfrider Foundation San Diego Chapter's current campaigns, programs and initiatives go to www.surfridersd.org or contact us at info@surfridersd.org or (858) 622-9661.



Surfrider Foundation San Diego County Chapter

9883 Pacific Heights Blvd, Suite D
San Diego, CA 92121
Phone: (858) 622-9661 Fax: (858) 622-9961

Comment: Natural sources are given low priority. But if we improve the ecosystem health of open spaces then they can act as filters for both natural and human sources. For example, protecting stream vegetation and wetlands (not just at the lagoon) along Los Penasquitos creek can improve filtering capacity/removal of all pollutants.

9. pg. 3-21, 3.2.1: Source Controllability: "Sources of stressors that are not controllable include: Discharges from open spaces and undeveloped land"

Comment: Properly protected/restored open space will have less harmful discharge. So this is a source that can be controlled to some extent.

10. pg. 4-6-9, Tables 4-1,4-2: Wet Weather Sediment Final Numeric Goals:

Comment: This applies to the city of Del Mar, Poway, and San Diego. The "increasing trend in salt marsh" and "reasonable assurance of compliance" is vague.

Need more specific goals with step-by-step progress.

11. pg. 4-11, Table 4-3: Wet Weather Bacteria Numeric Goals:

Comment: Not ambitious enough. Even by 2035 will still have a lot of days exceeding WQO.

12. pg. 4-55, Table 4-14: Dry Weather Numeric Goals for County of San Diego

Comment: The "routine observations" and "effective elimination of anthropogenic dry weather flows" seems like a really good approach that should be implemented by all copermittees, not just the County.

In conclusion, we feel that the WQIPs as proposed largely fail to meet the intent and requirements of the MS4 stormwater permit. It is our hope that the Regional Board will hold the copermittees accountable and demand more than just the proposed business as usual. Our membership and water enthusiasts are counting on you to ensure that we see marked improvements in regional water quality in the near-term!

Sincerely,

Julia Chunn-Heer
Policy Manager, San Diego County Chapter
Surfrider Foundation

Jennifer Olim
Co-Chair, Know Your H2O Committee
Surfrider Foundation

The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and enjoyment of our world's oceans, waves and beaches through a powerful activist network. Founded in 1984 by a handful of visionary surfers in Malibu, California, the Surfrider Foundation now maintains over 250,000 supporters, activists and members worldwide. For an overview of the Surfrider Foundation San Diego Chapter's current campaigns, programs and initiatives go to www.surfridersd.org or contact us at info@surfridersd.org or (858) 622-9661.