

San Diego Coastkeeper  
2825 Dewey Road #200  
San Diego, CA 92106

Building Industry Association of San Diego County  
9201 Spectrum Center Blvd., Suite 110  
San Diego, CA 92123

January 11, 2013

*Via e-mail to [wchiu@waterboards.ca.gov](mailto: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.

Wayne Chiu, San Diego Regional Water Quality Control Board  
Re: Coastkeeper and BIA Comments on Regional MS4 Draft Permit  
January 11, 2013  
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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jill", enclosed within a thin black rectangular border.

Jill Witkowski  
Waterkeeper  
San Diego Coastkeeper

A handwritten signature in blue ink, appearing to read "Borre Winckel", enclosed within a blue oval border.

Borre Winckel  
President & CEO  
BIA San Diego