

January 5, 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:

I am a professor of microbiology and general biology for San Diego County Community Colleges and a member of the San Diego Coastkeeper Community Advisory Council. I respectfully submit the following comments on the draft San Diego Regional Municipal Separate Storm Sewer System permit, Tentative Order No. R9-2013-0001.

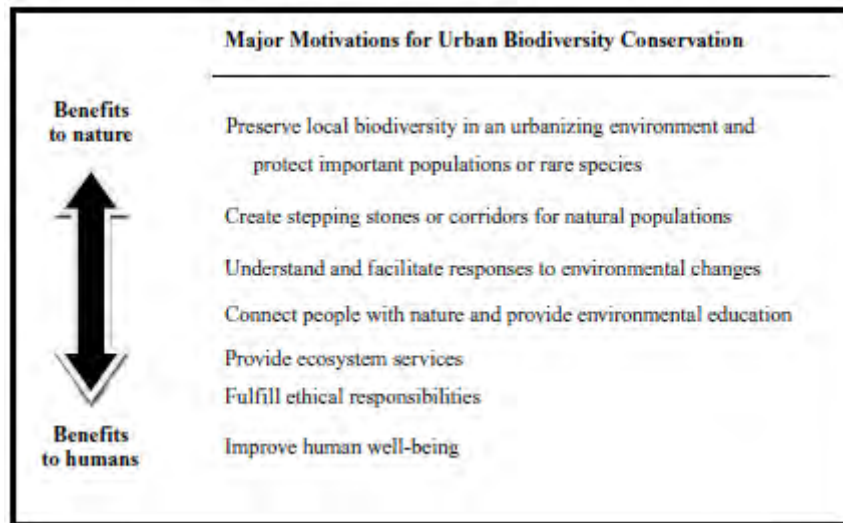
Urban runoff is the San Diego region's most urgent pollution problem. Arguably, it is the most difficult to solve. In a region known for its beaches and strong tourism economy, polluted runoff makes our beaches and waterways unsafe for swimming, fishing and other recreation for at least 72 hours after a rain event. Even in dry weather, our "urban drool" from residents and businesses overwatering lawns becomes a major pollution source. A recent scientific article by Viswanathan *et al.* delineated 'urban runoff' as a problem in almost every watershed in San Diego County:

Watersheds and Description of Associated Concerns		
Name of watersheds	Water quality concerns	Impacts
Carlsbad	Surface water quality degradation, beach closures, sedimentation, habitat degradation, and eutrophication	<u>Urban runoff</u> , agricultural runoff, sewage spills, domestic animals, and livestock
Otay	Surface water quality degradation, sedimentation, habitat degradation, and loss	<u>Urban runoff</u> , agricultural runoff, resource extraction, septic systems, and marinas
Penasquitos	Decline in surface water quality, beach closures, sedimentation, habitat degradation, and eutrophication	<u>Urban runoff</u> , sewage spills, dredging, and landfill leachate
Pueblo San Diego	Decline in surface water quality, habitat degradation, and toxins	<u>Urban runoff</u>
San Diego	Decline in surface water quality, degrading habitats, sediment, and eutrophication	<u>Urban runoff</u> , agricultural runoff, mining operations, sewage spills, and sand mining
San Dieguito	High levels of coliform bacteria, nutrients and sediment, resulting in declining surface water quality and habitat degradation	<u>Urban runoff</u> , agricultural runoff, and domestic animals
San Juan	Decline in water quality and habitat loss	<u>Urban runoff</u> , agricultural runoff, and military operations from Camp Pendleton are the major sources of pollution in this watershed
San Luis Rey	High levels of coliform bacteria, nutrients and sediment, resulting in declining surface water quality and habitat degradation	Agriculture and orchards, livestock, <u>urban runoff</u> , sand mining, and septic systems
Santa Margarita	Surface and groundwater quality degradation; habitat loss	Excessive sedimentation from development and agricultural areas
Sweetwater	Declining surface and groundwater quality and habitat degradation	Agricultural and <u>urban runoff</u>
Tijuana	Most severely impacted watershed in San Diego Basin	<u>Urban runoff</u> , sewage spills, industrial discharges, agricultural, livestock, and septic systems

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 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 groups with knowledge of the watershed.
- This stakeholder advisory group should work closely with the Copermittees 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. The impacts of reaching our goals together are two-fold, resulting in a win-win situation for the environment and society as described by Dearborn and Kark :



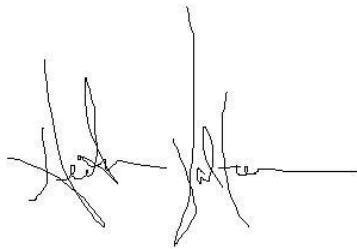
As San Diego continues to grow at 10% annually, it is imperative that we “understand and facilitate responses to environmental changes” as not only an ‘ethical responsibility’, but to improve our own human well-being. I’ve seen constant growth (even in the past 4 years of “recession”) in the East County, including a steady degradation of the biodiversity of the San Diego River despite the best conservation efforts of San Diego Mission Trails and other county and city parks. What occurs upstream is beyond the control of parks and land set aside for conservation. Urban runoff is a major contributor to this.

Wayne Chiu, San Diego Regional Water Quality Control Board  
Re: Environmental Groups' Comments on Regional MS4 Draft Permit  
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San Diego County Community Colleges and the San Diego Coastkeeper Community Advisory Council recognize the challenge urban runoff presents to our region, and we want to do our part to solve the problem. San Diego County Community Colleges and the San Diego Coastkeeper Community Advisory Council are interested in participating in a Water Quality Improvement Plan development process for the San Diego River watershed.

San Diego County Community Colleges the San Diego Coastkeeper Community Advisory Council urges the Regional Board to enhance the stakeholder participation opportunities as Water Quality Improvement Plans are developed and then approve the permit.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Hector Valtierra', with a horizontal line extending to the right.

Professor Hector Valtierra,  
M.A. (Liberal Arts), M.S. (Biochemistry), MPH (Public Health)  
San Diego County Community Colleges  
San Diego Coastkeeper Community Advisory Council

#### References

Dearborn DC and Kark S. **Motivations for Conserving Urban Biodiversity.** *Conservation Biology.* April 2010. Vol. 24, No. 2; pgs. 432 – 440.

Viswanathan S, Voss KA, Alex Pohlman, Gibson D, and Purohit J. **Evaluation of the Biocriteria of Streams in the San Diego Hydrologic Region.** *Journal of Environmental Engineering.* June 2010. Vol. 136; pgs. 627 - 637.