



CITY OF
CARLSBAD

Office of the City Manager

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November 5, 2012

Honorable Grant Destache, Chair
Honorable Board Members
San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, CA 92123

Re: TENTATIVE ORDER R9-2013-0001 REGIONAL NPDES PERMIT FOR MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4s) DRAINING THE WATERSHEDS OF WITHIN THE SAN DIEGO REGION

Dear Chairman Destache and Board Members:

On behalf of the City of Carlsbad (City), please accept the information contained in this letter as formal comment to Tentative Order R9-2013-0001 Regional NPDES permit for Municipal Separate Storm Sewer Systems (MS4s) draining the watersheds within the San Diego Region, in preparation for the Regional Board Member workshop on November 13, 2012.

The City would like to take this opportunity to thank the San Diego Regional Water Quality Control Board (RWQCB) personnel for their progressive approach to stakeholder involvement in drafting the Tentative Order in the past six months. Overall, the focused meetings have been successful and have resulted in an improved permit. However, there are a few areas that warrant further refinement to ensure the permit is implementable, effective at improving water quality where needed, and sustainable from a social, environmental, and economic perspective.

The San Diego Copermittees will be providing verbal comments during the workshop which are supported by the City.

The City is also a Responsible Party in the San Marcos Hydrologic Area (SMHA), and therefore subject to the Bacteria Beaches and Creeks TMDL regulations included in Attachment E of Tentative Order R9-2012-0001. The City of Encinitas, as the lead for the SMHA Responsible Parties has submitted a comment letter on behalf of the Responsible Parties, which is also supported by the City of Carlsbad. We look forward to your thorough review of both sets of comments.



We appreciate the opportunity to work with the Regional Board and stakeholders in the development of regulations to improve water quality in our region. If you have any questions or need further clarification, please do not hesitate to contact Elaine Lukey, Environmental Manager, at (760) 602-7582.

Sincerely,



John Coates
Acting City Manager

cc: Ronald Kemp, Assistant City Attorney
Cynthia Haas, Deputy City Manager
David Hauser, Director Property and Environmental Management
Elaine Lukey, Environmental Manager