



County of San Diego

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January 4, 2013

Mr. Wayne Chiu, P.E.
California Regional Water Quality Control Board, San Diego Region
9174 Sky Park Court, Suite 100
San Diego California 92123-4340

Dear Mr. Chiu,

**SUBJECT: Amendment of Draft Permit Language for Fire Fighting Activities –
Tentative Order No.R9-2013-0001, Regional MS4 Permit,
Place ID: 786088Wchiu**

As a local authority affected by the most recent MS4 Draft Permit we feel compelled to provide written comments to ensure that water quality regulations are practical, cost-effective, and scientifically justified. Since the County Fire Authority will be directly regulated by the Regional MS4 Permit, we are concerned that public funds and critical personnel may have to be spent or resourced to comply with requirements that are unnecessary, and that this will ultimately reduce the emergency personnel and funding available for essential public services.

It is vital that the resources required to keep our communities safe from the threat of fire be solely purposed for that task. For this reason the 15 rural fire agencies within San Diego County have joined the County Fire Authority's call to action to protect water quality while controlling the mounting and unsubstantiated costs of increased regulation on local governments, business, and industry. As written, the Tentative Order will result in a significant and unprecedented level of regulation and cost without clear scientific basis or environmental benefit. The Fire Authority along with the 15 rural agencies believe that the language incorporated in a re-issued permit should not deviate from the current permit unless the RWQCB can provide clear evidence that emergency fire fighting activities and fire sprinkler line flushing significantly impact stormwater runoff, and that the increased costs associated with proposed changes are justified and feasible. Accordingly, we ask that the Regional Board honor the language in the existing permit and make no changes at this time.

In order to provide the best service possible the Fire Authority and its 15 participating agencies must be focused on emergency activities and not with implementing BMPs or removing debris caused by the emergency after the fact. This should be the sole responsibility of the entities owning or operating the sites or facilities for which the fire agencies are responding. The Fire Authority also believes that existing requirements are sufficient to ensure that the flushing of fire sprinkler systems has minimal impact to storm water quality and should not be prohibited. These activities exist for the safety of the public and the environment and should be continued in their current fashion pursuant to existing permit requirements.

We are hopeful that the final permit language will result in programs that make sense from a public safety, environmental and economic standpoint. Please contact Greg Schreiner, Fire Marshal, if you have questions or would like to discuss our concerns. His number is 858-495-5425, email is greg.schreiner@sdcounty.ca.gov

Sincerely,



Herman Reddick,
Program Manager

CC:

Acting Chairman Gary Strawn, San Diego Regional Water Quality Control Board (SD RWQCB)
Board Member Eric Anderson, SD RWQCB
Board Member Henry Abarbanel, SD RWQCB
Board Member Tomas Morales, SD RWQCB
Board Member Sharon Kalemkarian, SD RWQCB
Executive Officer David Gibson, SD RWQCB