



**SAN DIEGO
AMERICAN SOCIETY OF
LANDSCAPE ARCHITECTS
CHAPTER**

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January 11, 2012

**Re: SDASLA COMMENTS ON THE DRAFT REGIONAL MUNICIPAL
SEPARATE STORM SEWER SYSTEM (MS4) (Tentative Order No. R9-2013-
0001)/(NPDS Case No. CAS0109266)**

PRESIDENT

Tim Jachlewski Jr., ASLA

Dear Mr. Chiu:

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The American Society of Landscape Architects (ASLA) continues to advocate across the country for economic recovery, sustainable design, quality of life issues and wise use of our natural resources including clean water. The San Diego Chapter of the American Society of Landscape Architects (SDASLA) is fully committed to these principals and respectfully submits the following comments, observations and recommendations to the draft San Diego Regional Municipal Separate Storm Sewer System at the request of the Regional Board.

The SDASLA fully supports the proposed approach to the permit that includes:

- Regional Permit / Holistic Approach
- Includes Strategic Planning
- Adaptive / Results Based Management
- Alternative Compliance / Mitigation
- Water Quality Improvement Plans (WQIP)

SDASLA understands that the proposed WQIPs in the draft permit will become powerful tools to help improve water quality within each of our ten watersheds and strongly recommends the following be added to the permit:

- Timely development of effective and enforceable WQIP(s).
- Each WQIP be developed through a process that ensures public participation such as the formation of a stakeholders advisory group.
- Stakeholder advisory groups for each watershed shall include representatives of environmental groups, business groups, community planning and /or sponsor groups, local universities and technical experts 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.
- Appropriate BMP's should be determined for each watershed and should be reviewed by a project engineer and / or Landscape Architect to determine if they are infeasible.

- If project BMP's are determined to be infeasible than no other burden of proof should be required.
- To sections 3.b.(3)(c) Priority Development Exemptions (Page 77), and 3.c.(b) Alternative Compliance Project Options (Page 81), add the following option:
 - Designed and constructed to be certified under the Sustainable Sites Initiative (SITES™), a voluntary certification program through the American Society of Landscape Architects, the Lady Bird Johnson Wildflower Center at The University of Texas at Austin and the United States Botanic Garden, receiving at least credits 3.5 and 3.6. under the "Site Design - Water" category.

SDASLA supports the use of Low Impact Development (LID) BMP Requirements strategies when geologically appropriate and feasible. However, other options should be available to strengthen overall water quality such as in-lieu fees, mitigation and redevelopment of key sites to encourage smart growth and urban infill / redevelopment in the future. SDASLA encourages the required development of a priority site list by each Copermittee during the planning process for which in-lieu fees / mitigation may be applied. These sites could function as large water holding and infiltration sites and double as public open space / educational areas. However, SDASLA is concerned that not all BMPs will be effective or feasible throughout the basin. SDASLA recommends that the Copermittees be allowed to customize the application of specific BMPs on a watershed by watershed basis through the development of robust and enforceable Water Quality Improvement Plans rather than imposing a universal suite of BMPs on all watersheds regardless of their feasibility of applicability.

By taking advantage of the knowledge and resources of diverse stakeholders like municipalities, businesses and residents, environmental groups, technical experts and the academia, our region can benefit greatly from solutions that provide cleaner water more efficiently, quickly and cost effectively creating healthier communities. But this can only be achieved if these stakeholders are involved in a meaningful way during the Water Quality Improvement Plan development process.

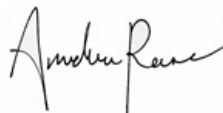
SDASLA recognizes the challenge this permit and the proposed changes represents to our region, and would like to help by participating in the Water Quality Improvement Plan development process. SDASLA urges the Regional Board to enhance the stakeholder participation opportunities during Water Quality Improvement Plan development before approving the final permit.

Thank you for your consideration and we look forward to continuing our work with you and your staff on this draft permit.

Sincerely yours in Landscape Architecture,



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