

January 11, 2013

San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

Subject: Tentative Draft Order Number: R9-2013-0001

The Laguna Bluebelt Coalition is dedicated to marine life protection through cooperative efforts in education, enforcement, water quality improvements, habitat restoration and networking among diverse stakeholders, agencies and elected officials. We support efforts by many local and regional environmental groups and organizations to address urban runoff pollution in the Aliso Watershed as a model for other impaired creek and coastal receiving waters. The following comments on the draft San Diego Regional Municipal Separate Storm Sewer System permit are intended to educate and motivate sustainable solutions to creek and ocean pollution..

Urban runoff is the San Diego region's most urgent pollution problem. Laguna Beach and the regional economy depend upon a healthy ecology. 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, contaminated urban runoff from known from residential and commercial overwatering becomes a major regional pollution source.

Today modern techniques, tactics and technologies can re-purpose polluted water as a "new water" resource. By working together as a community, we can solve this challenging public health problem affecting our economy and healthy ecology. 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 Laguna Bluebelt Coalition recognizes the challenges and opportunities urban runoff presents to our region, and we want to do our part to implement innovative, sustainable solutions to water pollution. The Laguna Bluebelt Coalition is committed to participating in a Water Quality Improvement Plan development process for the Aliso Watershed.

Among recommended actions to mitigate present impacts to Laguna Beach's creek, estuary, beach and coastal receiving waters are the following:

1. Map all creek and coastal receiving waters indicating water quality impacts. (SCCWRP, Scripps, NOAA, etc.) A Bioregional Watershed Map will identify degraded land elements, offending storm drain outlets and candidate areas for re-forestation and estuarine/coastal restoration.
2. On an annual basis, issue citations against the primary six known storm drain point sources in each watershed. This measure will incrementally compel clean-up and abatement throughout a given watershed bioregion without the burden of costs to abate all points of contamination at once. Failed Best Management Practices (BMPs) urban runoff facilities, required as a Condition of Approval for inland residential developments, can be retrofitted with dry weather diversions to local Publically Owned Treatment Works (POTWs) or, alternatively, re-engineered with deep groundwater injection wells.
3. Fines must be allocated to re-vegetate impaired watersheds and kelp forests to restore the native functions of semi-arid creeks and protected coastal receiving waters. A re-forested Aliso Canyon with a canopy similar to San Mateo Creek will qualify for California Cap and Trade funding to offset costs. Restoration of natural habitats is demonstrated to be the best, most cost effective measure for improving watershed water quality.
4. Restoration of high value coastal wetlands and estuaries will guarantee protection of natural beach sand berms and provide measurable improvement to coastal receiving waters. Funds from the California Coastal Conservancy and other wetland recovery resources can offset costs.
5. Watershed restoration will offer multiple community benefits by reducing destructive stormwater flows, eliminating pollutants and increasing eco-tourist revenues to surrounding cities. Large street cisterns incorporating designs proposed by GeoSynTech for the re-development of the Aliso Golf Course can serve as a model for extensive rainwater harvest/reuse systems. Restoration of some or all of the 1500 foot Aliso Creek Ox Bow in Laguna Niguel can restore hydric soils to reduce stormwater impacts.
6. Increased use of recycled water for wildland fire suppression along the entire Highway 73 Toll Road bisecting the Laguna Greenbelt will maintain a healthy, fire safe wilderness area. Orange County Measure M and State Proposition funds are available to offset costs. Increased use of recycled water reduces ocean discharges to the Laguna State Marine Conservation Area.
7. A citywide network of recycled water for all of Laguna Beach will reduce imported water demand significantly and increase water security, disaster preparedness and fire suppression resources. Revenues from routine use for irrigation mandated Fuel Modification Zones will provide new revenue streams. Laguna Beach is the only Orange County city without a comprehensive recycled water program and remains a "once use" community of valuable imported water.

The Laguna Bluebelt Coalition appreciates the Staff and Regional Board's commitment to supporting key community stakeholder participation opportunities during Water Quality Improvement Plan development and then approves the permit.

Thank you for your dedication to regional water quality improvements for our creeks, canyon and coastal waters.

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