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San Diego Regional Water Quality Control Board (RWQCB)  
2375 Northside Drive, Suite 100  
San Diego, CA 92108  
Attention: Mr. Wayne Chiu  
September 14, 2015

**RE: Comment - Tentative Order No. R9-2015-0100, Place ID:786088WChiu.**

Thank you for the opportunity to comment on the above-referenced permit. The City of Escondido is working with other San Diego County Copermittees in developing regional comments. This letter has been prepared to address an additional item of concern to staff.

In Attachment C, page C-3 a definition of construction activities has been added. Although staff understands that it may be useful to clarify what is considered construction activities, there is concern at the description of some of the types of activities as "phases." Phases of construction are significant as they are required to be considered when defining inspection frequencies for construction. The permit requires Copermittees to conduct inspections "at an appropriate frequency for each phase of construction."

This definition as written introduces additional phases (Preliminary Phase, Land Development Phase and Streets and Utility Phase) that are not necessarily discrete. Utilities and streets can be installed during any part of the construction project. The "Preliminary Phase" as described would be covered under the grading phase. It is not clear what the "Land Development Phase" covers. At present the City of Escondido tracks construction in two phases, grading and vertical which covers all construction activities.

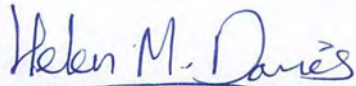
The use of the word "Phase" to describe these aspects of construction activities introduces unnecessary complication to the inventorying and inspection of construction sites as it introduces artificial phases that will not be readily tracked. City of Escondido staff have just completed a two year process of updating their inspection programs to include systems to track construction sites through the grading and vertical phases and trained staff to follow these requirements. Adding the phase to these terms will require a reworking of the program to introduce artificial "phases" that are not discrete from what is already being addressed.

**Recommendation: Eliminate the use of the term phase when describing construction activities as presented below.**

Construction Activities – Actions implemented during construction of development or redevelopment projects during the Preliminary TasksPhase (including rough grading and/or disking, clearing and grubbing operations, or any soil disturbance prior to mass grading), Grading or Land Development Phase (including topography and slope reconfiguration, alluvium removals, canyon cleanouts, rock undercuts,

keyway excavations, land form grading, and stockpiling of select material for capping operations), Streets and Utility Installation Phase (including excavation and street paving, lot grading, curbs, gutters and sidewalks, public utilities, public water facilities including fire hydrants, public sanitary sewer systems, storm sewer systems and/or other drainage improvements), or Vertical Construction Phase (including the build out of structures from foundations to roofing, including rough landscaping).

I appreciate the opportunity to comment on the draft Tentative Order. I can be contacted at [hdavies@escondido.org](mailto:hdavies@escondido.org) or at (760) 839-6315.



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