



SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD

County of San Diego

LAND USE AND ENVIRONMENT GROUP

2009 SEP 14 A 11:48

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September 10, 2009

Cynthia Gorham-Test
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

RE: Integrated Report for the San Diego Region: Comments on Draft Section 305(b) and 303(a)

Dear Ms. Gorham-Test:

Thank you for the opportunity to comment on the draft Section 305(b) and 303(d) Integrated Report for the San Diego Region. On behalf of the San Diego Municipal Stormwater Copermittees, I am writing to request an extension of the public comment period and a postponement of the public hearing on this matter. The 303(d) list of impaired water bodies is of critical importance to this region, not only because it sets the stage for future development of total maximum daily loads (TMDLs), but also because it influences how the Copermittees implement many elements of their Jurisdictional and Watershed Urban Runoff Management Programs (URMPs). For example, inspection frequencies and post-construction BMP selection are in many cases determined by the proximity of sites to 303(d)-listed water bodies. Water quality monitoring and watershed management requirements are also directly impacted by 303(d) impairments.

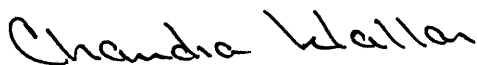
According to the *Notice of Filing and Notice of Public Hearing* issued by your office on August 31, 2009, public comments submitted after September 14, 2009, will not receive a written staff response prior to the public hearing. Two weeks is an insufficient amount of time to conduct a thoughtful and well-reasoned review of a proposed 303(d) list update. Moreover, this coincides with a period in which Copermittees are already heavily burdened with the completion of JURMP annual compliance reports for fiscal year 2008-2009 (which are due on September 30, 2009) and making preparations for the start of the rainy season, which begins October 1, 2009. Given the large number of proposed revised listings (162) and de-listings (116), the significant amount of data provided to support each decision and the need to compare listing decisions to the relatively new guidelines provided in the *Water Quality Control Policy for Developing*

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California's Clean Water Act Section 303(d) List, more time is needed to conduct an adequate review of the Integrated Report. It would be of great benefit to the Copermittees, the Regional Water Quality Control Board, and other interested parties to ensure that all significant issues are addressed during the written comment period, and that a staff response to them is prepared with adequate time for public review prior to the hearing. This will ensure a smoother public process and decrease the likelihood that significant new issues will be raised during public testimony.

For the reasons stated above, Copermittees respectfully request that both the written comment period and the public hearing be postponed a minimum of 30 days each. Thank you for your consideration of this request. If you have any questions regarding this request, please contact Todd Snyder, San Diego County Department of Public Works' (DPW) Watershed Protection Program Planning Manager, at (858) 694-3482 or email at Todd.Snyder@sdcounty.ca.gov. Please feel free to contact me, as well, at (619) 531-6256.

Respectfully,



CHANDRA L. WALLAR, Deputy Chief Administrative Officer
Land Use and Environment Group

CLW:cw

cc via email: John L. Snyder, Director, DPW
Richard E. Crompton, Assistant Director, DPW
Cid Tesoro, Watershed Protection Program Manager, DPW
Todd Snyder, Watershed Planning Manager, DPW