

January 11th, 2013



Via e-mail to

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San Diego Regional Water Quality Control Board

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RE: Comments on Tentative Order Number: R9-2013-0001

Dear Mr. Chiu:

The Escondido Creek Conservancy (TECC) respectfully submits the following comments on the draft San Diego Regional Municipal Separate Storm Sewer System Permit, Tentative Order No. R9-2013-0001.

Urban runoff is not only one of the San Diego area's most urgent pollution problem, it is also one of the most challenging. In a region known for its beaches and strong tourism economy, polluted runoff makes our beaches and waterways unsafe for surfing, swimming, fishing, and other recreation for at least 72 hours after a rain event. Even in dry weather, runoff due to residential, municipal, and industrial irrigation for urban and suburban landscape can be a major pollution source.

Despite this challenge, we are confident that this public health problem can be successfully mitigated by working collaboratively as a community. 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, and these groups should include representatives of environmental and other public interest organizations with knowledge of the respective watersheds.
- The stakeholder advisory groups should work closely with the Copermittees and a Regional Board staff member during the development phase of Water Quality Improvement Plans to ensure these Plans target significant water quality goals that are both significant and quantifiable.
- The stakeholder advisory process should include accountability and measureable milestones to ensure the goals of the Permit are being met, as defined in the Water Quality Improvement Plans.

The Escondido Creek Conservancy (TECC) is a non-profit, public benefit, corporation dedicated to the preservation and protection of the natural open space within the Escondido Creek watershed. We support educational programs and compatible outdoor recreation within the watershed for the benefit of all residents of the area.

By taking advantage of the knowledge and resources of diverse stakeholders like municipalities, businesses, and residents, the San Diego area can be a pioneer in controlling urban runoff, creating healthier communities and watersheds, and improving our local beaches. Not only will the steps listed above help to accomplish these goals, but also bolster the local economy by firmly establishing San Diego as the country's finest coastal destination. However, all of these benefits can only be achieved if the diverse voices of the watershed stakeholders are influencing the planning process in a meaningful way.

TECC recognizes the challenge urban runoff presents to our region and is committed being a part of the solution. Consequently, TECC is interested in participating in a Water Quality Improvement Plan development process for the Carlsbad Hydrologic Unit watershed.

In summary, TECC urges the Regional Board to enhance the stakeholder participation opportunities as Water Quality Improvement Plans are developed and subsequently approve the permit.

Respectfully submitted,

Kevin Barnard

Kevin Barnard
President
The Escondido Creek Conservancy