



THE CITY OF SAN DIEGO



August 22, 2011

Electronic Delivery to commentletters@waterboards.ca.gov

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: **Comment Letter – Phase II Small MS4 General Permit**

Dear Ms. Townsend:

The City of San Diego, Transportation & Storm Water Department (City) appreciates the opportunity to provide comments on the Phase II MS4 Permit (draft permit). We appreciate the State Board's efforts to bring additional point sources into compliance with water quality regulations. Based on our review of the draft permit, we have some concerns we wish to bring to your attention.

This draft permit includes marinas; however, the State Board Water Resources Control Board (State Board) sent out a public notice regarding a tentative marina permit on May 6, 2009. Research on the State Board's website documents the continuing activities of the Marina & Recreational Boating Interagency Coordination Committee. The committee's meeting notes and the tentative marina permit appears to address the marina landside and waterside activities; whereas, this draft permit only addresses the landside activities. Based on the review of both programs, the City of San Diego strongly recommends removing marinas from this draft permit in favor of the comprehensive marina permit.

The City appreciates the State Board's consideration for the Phase II permittees to implement the existing Phase I post-construction storm water management requirements wherever they are in effect. We recommend that the Phase II Permittees also comply with all pre-construction requirements that are being implemented in a Phase I jurisdiction. These actions will allow for consistent implementation of activities across municipal boundaries, particularly when non-traditional Phase II permittees are within a Phase I jurisdiction. The public outreach and education component also mandates coordination with the Phase I permittees. This requirement is favorable most of the time; however, there may be instances where Phase II MS4 storm water outreach to their clients and/or employees may vary from the municipalities' program requirements. We recommend collaborative efforts with the Phase I permittees regarding monitoring activities to minimize duplication and possible right of entry permitting issues. The draft permit requirements for a Phase II permittee to collect samples from the downstream



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receiving water that is outside of their boundaries will require them to obtain right of entry permits from the local municipality. For example, if a Phase II permittee has to collect samples from the downstream river system within the City of San Diego, that institution will have to obtain a right of entry permit. We request that Phase II permittees be required to obtain authorization from the Phase I jurisdiction when monitoring beyond their boundaries or within other agencies' easements.

41.4 → Review of *Attachment E: Non-traditional Small MS4 K-12 School Districts* the section for Region 9 is incomplete and inaccurate. The San Diego Unified School District is listed twice and other school districts are not listed. We recommend that the attached *Chief Administrative Officers 2010-2011* list, found on the San Diego County Office of Education's website, replace the existing list for Region 9 in Attachment E, after confirming which school districts are within Region 9's jurisdiction.

41.5 → Review of *Attachment G: Region Specific Requirements, Regional Water Board Approved TMDLs where urban runoff is listed as a source* has no entries for Region 9. We request that all Phase II Non-Traditional MS4 permittees be listed as sources regarding the Chollas Creek Diazinon Total Maximum Daily Load (TMDL), the Chollas Creek Dissolved Copper, Lead, and Zinc TMDL, the Revised Total Maximum Daily Loads for Indicator Bacteria, Project I – Twenty Beaches and Creeks in the San Diego Region (Including Tecolote Creek), the developing Los Penasquitos Lagoon Sedimentation TMDL, and any other TMDL under development.

If you have any questions, please contact Ruth Kolb at (858) 541-4328 or at rkolb@sandiego.gov.

Sincerely,


Kris McFadden
Deputy Director

KMrk

Attachment: San Diego County Office of Education Chief Administrative Officers 2010-2011 list

cc: Almis Udryns, Deputy Director, Office of the Mayor
Garth K. Sturdevan, Interim Director, Transportation & Storm Water Department
Ruth Kolb, Program Manager, Transportation & Storm Water Department
Drew Kleis, Program Manager, Transportation & Storm Water Department

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