

## County of San Diego

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November 10, 2014

Laurie Walsh San Diego Regional Water Quality Control Board 2375 Northside Drive, Suite 100 San Diego, California 92108 Via Email

Laurie.Walsh@waterboards.ca.gov

Re: Tentative Order R9-2015-0001, Place ID:658019LWalsh

Dear Ms. Walsh:

Please accept this correspondence as the County of San Diego's legal comments on the above Tentative Order. County Public Works staff will also be submitting technical comments on aspects of the Tentative Order prior to the comment deadline.

Because it is not clear at this point what legal impact the anticipated adoption of Order R9-2015-0001 will have upon the pending appeals with the State Water Resources Control Board of the order being amended (R9-2013-0001), the County renews all of its objections to various aspects of the Tentative Order as described in the County's Petition to the SWRCB in that proceeding (State Water Resources Control Board Petition and Request for Stay of County of San Diego designated A-2254 (h)), incorporated by reference to this objection letter.

Further, because the Tentative Order does not incorporate the changes requested by the County of San Diego or other petitioners in proceeding A-2254, the County renews all objections from all petitioners to R9-2013-0001 as applicable to the provisions of R9-2015-0001 when adopted by the RWQCB.

Very truly yours,

THOMAS E. MONTGOMERY, County Counsel

By

James R. O'Day, Senior Deputy

JRO/tlm 13-90386