



Christopher W. McKinney
Director of Utilities
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September 13, 2012

Ms. Laurie Walsh
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

Re: CITY OF ESCONDIDO COPERMITTEE COMMENT SUBMITTAL ON THE
ADMINISTRATIVE DRAFT MUNICIPAL SEPARATE STORM SEWER (MS4) PERMIT
(TENTATIVE ORDER NO. R9-2012-0011)

Dear Ms. Walsh:

Thank you for the opportunity to comment on the Administrative Draft Municipal Separate Storm Sewer (MS4) Permit that is proposed to cover portions of San Diego County, Orange County, and Riverside County (Tentative Order No. R9-2012-0011). Although the City generally concurs with those comments that are provided as part of the San Diego Copermittees' submission, we do have a particular comment and request to make regarding our inclusion in the San Luis Rey (SLR) Watershed as part of the proposed 2012 draft permit.

During the 2007 draft permit issuance process, the City successfully applied for a waiver from participation/inclusion in the San Luis Rey (SLR) Watershed based on our minimal geographic representation in it. Escondido's 2008 JURMP submittal includes the following language that documents the approved rationale for our non-membership in the SLR Watershed:

1.4.1 San Luis Rey Watershed

Approximately 53 acres of the City are located within the San Luis Rey Watershed, which is associated with Daley Ranch, an open-space preserve that will remain undeveloped in perpetuity. This area occupies only 0.014 percent of the San Luis Rey Watershed and is far removed from any tributary that would convey runoff into San Luis Rey River. Because of this extremely low runoff contribution to the San Luis Rey Watershed, the City of Escondido is not included as a member agency in the management of this watershed. Therefore, for the purposes of assessing and controlling potential pollutants in runoff within watershed areas, the City focuses on the Carlsbad and San Dieguito River watersheds, which make up the majority of the City's jurisdiction.

The attached map provides a visual depiction of our continuing minimal and undeveloped footprint in the SLR Watershed. In addition, I have attached an email from

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the City of Oceanside, the lead for the SLR Watershed, which supports Escondido's continued exclusion.

The City of Escondido appreciates your consideration of this matter and looks forward to working with the Regional Board to further improve water quality in our region.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cheryl Filar".

Cheryl Filar
Environmental Programs Manager

cc: Christopher W. McKinney, Director of Utilities
Cynthia Mallett, Environmental Specialist, City of Oceanside

Cheryl Filar

From: Cynthia Mallett <CMallett@ci.oceanside.ca.us>
Sent: Wednesday, September 12, 2012 3:12 PM
To: Cheryl Filar
Cc: Paul Hartman (phartman@cityofvista.com); Scott Norris (scott.norris@sdcounty.ca.gov); Mo Lahsaiezadeh; Alison Witheridge
Subject: Exclude Escondido from SLR Watershed

Hi Cheryl,

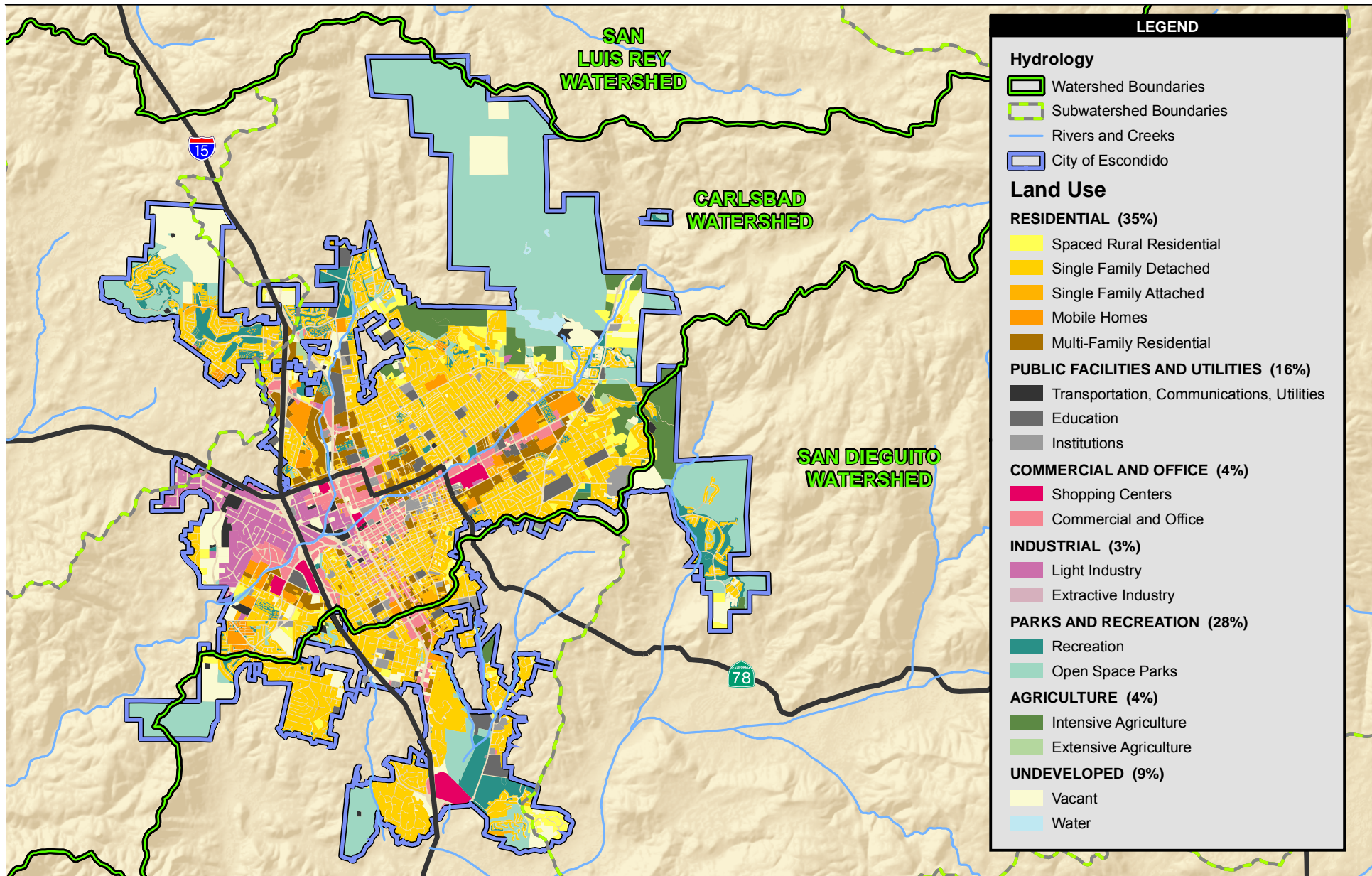
I received your email regarding exclusion from the SLR Watershed in the draft administrative Stormwater Permit. I discussed this internally with Oceanside staff and we are fine with the exclusion. The City of Vista and the County of San Diego are fine with this exclusion as well. Also, in the San Diego County Copermittee comments to the RWQCB on the Draft Administrative Permit, Escondido is not included in table B-1 for the San Luis Rey Watershed Management Area.

Let me know if you have any questions.

Thank you,

Cynthia Mallett
Environmental Specialist
Oceanside Clean Water Program
760-435-5807
Urban Runoff Hotline
760-435-5800





Source: USGS 2000; SANDAG 2010; California Interagency Watershed Mapping Committee 2004; City of Escondido 2009

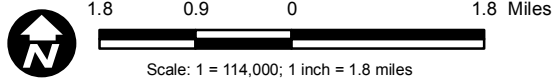


Figure 1-2
Land Use Designations