



San Elijo Lagoon CONSERVANCY

25 years of watershed moments

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Via e-mail to wchiu@waterboards.ca.gov

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

Dear Mr. Chiu:

San Elijo Lagoon Conservancy respectfully submits the following comments on the draft San Diego Regional Municipal Separate Storm Sewer System Permit No. 008965.

Administrative Record Page No. 008965

Urban runoff is the San Diego region's most urgent pollution problem. Arguably, it is the most difficult to solve. In a region known for its beaches and strong tourism economy, polluted runoff makes our beaches and waterways unsafe for swimming, fishing and other recreation for at least 72 hours after a rain event. Even in dry weather, our "urban drool" from residents and businesses overwatering lawns becomes a major pollution source.

The good news is by working together as a community, we can solve this challenging public health problem. 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 that includes representatives of environmental groups with knowledge of the watershed.
- This stakeholder advisory group should work closely with the Copermittees and a regional board staff member while the Water Quality Improvement Plans are being developed to ensure these plans aggressively pursue water quality gains.
- The stakeholder advisory process should include accountability and measureable milestones to ensure the goals of the Permit are being met.

By taking advantage of the knowledge and resources of diverse stakeholders like municipalities, businesses and residents, our region can be on the cutting-edge of addressing urban runoff and creating healthier communities and watersheds. But this can only be achieved if these diverse voices are impacting the planning process in a meaningful way.

San Elijo Lagoon Conservancy recognizes the challenge urban runoff presents to our region, and we want to do our part to solve the problem. San Elijo Lagoon Conservancy is interested in participating in a Water Quality Improvement Plan development process for Escondido Creek watershed and the Carlsbad Hydraulic Unit.

San Elijo Lagoon Conservancy urges the Regional Board to enhance the stakeholder participation opportunities during Water Quality Improvement Plan development and then approve the permit.

Respectfully submitted,

Doug Gibson
Executive Director / Principal Scientist