



County of San Diego

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November 1, 2005

Mr. John Minan
Chair
California Regional Water Quality Control Board
San Diego Region 9
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

RE-ISSUANCE OF THE SAN DIEGO MUNICIPAL STORMWATER PERMIT – PROPOSED PERMIT LANGUAGE

Dear Chairman Minan and Members of the Board:

At its September 14, 2005, public workshop on the re-issuance of the San Diego Municipal Storm Water Permit, your Board provided a forum for the County of San Diego and other Coperittees to present information on the municipal storm water permit in general, as well as on the anticipated key topics of the new permit. As a follow-up to that workshop and to the Copermittees' Report of Waste Discharge (ROWD), the County has prepared draft permit language that incorporates the principles and specific recommendations described in the ROWD. We offer this draft language to assist your staff in preparing the formal draft Permit for public comment. To facilitate your review of the information we have provided, we also enclose a summary of the changes between the existing permit and the proposed new permit language.

Because many of the points discussed at the September 14 workshop and in the ROWD were somewhat conceptual, the proposed language is respectfully submitted to provide specific examples of how such points could be incorporated as specific, enforceable permit language. We hope that RWQCB staff will find this useful as they craft a new Permit.

The proposed language is being submitted by the County as an individual Copermittee, and not on behalf of all the Copermittees. It provides a tangible mechanism to put the ROWD's guiding principles into action; therefore we believe it will be broadly supported by the Copermittees.

We recognize the potential for tension between a Permit approach that provides the opportunity for acquiring, learning from, and adapting to new knowledge while remaining enforceable and true to the intent of the Clean Water Act and the Porter-Cologne Act. However, we also believe that addressing such challenges will result in new approaches that ultimately promote better resource management and program implementation. As such, we believe that our proposed permit language, in combination with continued dialogue, will achieve our common goal of Permit programs that are strategic, measurable and adaptive.

Sincerely,



for **ROBERT R. COPPER**
Deputy Chief Administrative Officer
Land Use and Environment Group

Enclosures

cc: Eric Anderson, Board Member
Alan Barrett, Board Member
Daniel Johnson, Board Member
Janet Keller, Board Member
Jennifer Kraus, Vice Chair
Susan Ritschel, Board Member
Richard Wright, Board Member
John Robertus, Executive Officer