



San Diego County Water Authority

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SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD

2009 JUN 19 P 2:56

June 19, 2009

Mr. Ben Neill

San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4353

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REPRESENTATIVE

County of San Diego

Subject: San Diego County Water Authority Comments on the San Diego Regional Water Quality Control Board ("Regional Board") Revised Tentative Order No. R9-2009-0002, NPDES CAS018740, Orange County Municipal Storm Water Permit Reissuance (Regional Board Code NWU:658018:bneill)

Dear Mr. Neill:

The Water Authority supports comments provided to the Regional Water Quality Control Board by USMC Camp Pendleton, dated June 19, 2009, on the Orange County Municipal Storm Water Permit Reissuance Order No. R9-2009-0002. Although Camp Pendleton is a member of the Water Authority, they remain almost fully self-sufficient by virtue of their reliance on local groundwater supplies from both the San Mateo and Santa Margarita groundwater basins. These local supplies are critical for Camp Pendleton's long-term sustainability and help maintain the overall sustainability of the San Diego Region.

The Water Authority supports the use of low impact development (LID) approaches to storm water management to the extent that the LID improves water quality and does not reduce water available to our member agencies that may use local groundwater basins. Stormwater capture also has the potential to augment local water supplies if it is properly managed by capturing peak flows that would otherwise be lost to the ocean. Focusing efforts on those stormwater activities that would increase local supplies would have multiple benefits and would be supported by the Water Authority.

We are concerned with the approach proposed in the proposed Permit that would require LID retrofits of existing properties in South Orange County. State Board policy encourages the use of LID and hydromodification to reduce hydrograph peaking and maintain water quality. In the past, the focus has been on using LID in new development in a manner that would maintain current flows. Retrofit of existing properties has the potential to alter the downstream flows in San Mateo Creek reducing the availability of water that is currently captured, recharged, and extracted in local water supply wells. This could potentially raise serious water rights issues. For each basin where LID is contemplated, the impact of such an action on the local

A public agency providing a safe and reliable water supply to the San Diego region

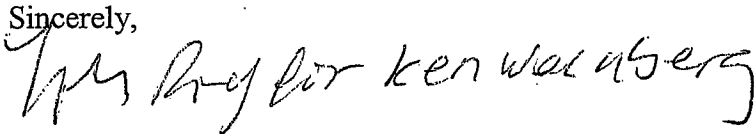
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water supply should be evaluated. Implementation of LID, as proposed in the Permit, should not be contemplated until a comprehensive evaluation and modeling of the groundwater basin is completed that would assess the overall impacts on water supply as a result of compliance with the Permit requirements.

We support the Camp Pendleton's recommendations that are designed to protect their local water supply and water rights.

If you have any questions regarding this letter, please contact Toby Roy at (858) 522-6743

Sincerely,

A handwritten signature in black ink that reads "Ken Weinberg". The signature is written in a cursive style and is positioned above the printed name.

Ken Weinberg
Director of Water Resources