



Helix Water District

Setting standards of excellence in public service

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SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD

August 7, 2009

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Item No. 13
Supporting Document No. 12

Mr. John Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4353

Re: Draft Tentative Order No. R9-2009-0094, NPDES Permit No. CAG679001

Dear Mr. Robertus:

The purpose of this letter is to request that the California Regional Water Quality Control Board (CRWQCB) postpone the adoption of the subject Order to allow stakeholders input in creating an Order that meets the goal of protecting the receiving waters of our region without causing an undue burden on the operations of public agencies.

The Helix Water District, along with all of the water agencies in the San Diego Region, understands the need to protect receiving waters, and we share the CRWQCB's goal of improving water quality in the region. Water agencies are good stewards of the environment whose operations are also negatively impacted by the degradation of water bodies in the region. We assure you that it has been, and will continue to be, our intent to protect the receiving waters of our region. In 2002, water agencies responded to Order No. R9-2002-0020, NPDES No. CAG679001, by developing Best Management Practices (BMPs) and utilizing Best Available Technologies (BATs) to ensure the operation of our systems did not negatively impact receiving waters. To date, we are unaware of any instances where receiving waters in our region have been impacted as a result of our operations.

Along with many other water agencies in the CRWQCB San Diego Region, the Helix Water District has several concerns about the requirements of the Draft Tentative Order No. R9-2009-0094, NPDES Permit No. CAG679001 that was released to interested parties on June 25, 2009 and which is scheduled to be adopted on Wednesday, August 12, 2009. The Helix Water District did not receive any mailings regarding the Order as stated in your Revised Executive Officer Summary Report, and first learned of the Order on July 1, 2009 from fellow water agencies.

Since July 20, 2009, a Technical Advisory Committee (TAC), made up of representatives of water purveyors in San Diego County, has met twice with your staff to try and understand the reasons behind the changes to the Order. Meetings between our staffs have been cooperative in nature and we appreciate your staff's willingness to discuss and work toward resolving our concerns. There has been much progress made in a short amount of time and we are optimistic that an Order which meets our mutual goals and objectives will be reached very soon.

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San Diego Region
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On Thursday, August 6, 2009, CRWQCB staff released the current draft of the Order which contains many significant changes. We feel that four days is insufficient time to review these changes, provide thoughtful comments, and produce an Order that is mutually acceptable.

The Helix Water District requests delaying the adoption of the Draft Tentative Order No. R9-2009-0094, NPDES Permit No. CAG679001, until the TAC and CRWQCB staff can craft a mutually acceptable Order. If you have any questions, please contact Tristan Hayman, Director of Field Operations & Distribution at (619) 596-1306.

Sincerely,



Mark S. Weston
General Manager

c: Michelle Mata, CRWQCB

