



# County of San Diego

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May 20, 2015

Ben Neill  
San Diego Water Board  
2375 Northside Drive, Suite 100  
San Diego, CA 92108-2700

VIA EMAIL TO: [SanDiego@waterboards.ca.gov](mailto:SanDiego@waterboards.ca.gov)

Dear Mr. Neill:

COMMENT – TENTATIVE ORDER NO. R9-2015-0013

The County of San Diego (County) appreciates the opportunity to comment on the Draft Tentative Order No. R9-2015-0013, General Waste Discharge requirements for Groundwater Extraction Discharges to Surface Waters within the San Diego Region, NPDES No. CAG919003 (draft Tentative Order). The County supports the draft Tentative Order finding that groundwater extraction discharges from post construction single-family residential structures or lots are not regulated by this order due to potentially prohibitive costs associated with the requirements of the Tentative Order (Attachment F, pg. F-9).

The County of San Diego submits that there are other residential land uses within the region that could also be considered as low volume groundwater dischargers, including duplexes and other multi-family structures, as well as the common recreational areas within these residential land uses. The County recommends that Section I.B.10 Discharges Not Regulated by this Permit be revised as follows:

"Groundwater extraction discharges from post construction residential areas including single-family residential homes or lots, duplexes and other multi-family homes and any common use areas associated with these residential areas ~~single family residential home,~~ unless such a discharge has been determined to cause or contribute to a condition of pollution or nuisance. This determination may be made by the San Diego Water Board or by the appropriate local agency with the San Diego Water Board's concurrence."

Mr. Neill  
May 20, 2015  
Page 2

The County of San Diego appreciates the dedication of the San Diego Region Water Quality Control Board staff to improve water quality and we look forward to continuing to work closely with you.

If you have questions or comments, please contact Planning Program Manager, Jo Ann Weber at (858) 495-5317 or via email at [JoAnn.Weber@sdcounty.ca.gov](mailto:JoAnn.Weber@sdcounty.ca.gov).

Sincerely,



TODD E. SNYDER, Manager  
Watershed Protection Program

cc: Jo Ann Weber, Planning Program Manager (O332)  
Tracy Cline, Land Use/Environmental Planner III (O332)