



THE CITY OF SAN DIEGO

July 16, 2012

Electronic Submission: commentletters@waterboards.ca.gov

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814



Subject: Comment Letter – 2nd Draft Phase II Small MS4 General Permit

Dear Ms. Townsend:

The City of San Diego, Transportation & Storm Water Department (City) appreciates the opportunity to provide comments on the second draft of the Phase II Small MS4 General Permit (Phase II MS4 Permit) dated May 18, 2012.

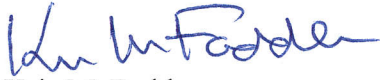
The City thanks the State Board for its efforts on bringing the Phase II dischargers under regulation to include all dischargers with the responsibility to protect and restore water quality. Due to the increased compliance burden within Areas of Special Biological Significance, within watersheds where impairments are listed, or where Total Maximum Daily Loads (TMDLs) are being developed or adopted, the City is requesting the entities shown on the attached enclosure be incorporated into Attachment B – Non-Traditional Small Phase II Permittees. Each entity should be covered by the Phase II MS4 Permit because it is within a watershed that is listed as impaired, or already has an adopted TMDL. Unregulated discharges from these entities may cause or contribute to water quality exceedances. Ensuring that these dischargers are covered under the Phase II MS4 Permit is an important step in ensuring that all of the dischargers are subject to the applicable TMDL requirements so that the receiving water targets will be achieved.

Thank you for your time and consideration of this request. If you have questions, please contact Ruth Kolb at (858) 541-4328 or at rkolb@sandiego.gov.



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Jeanine Townsend

Sincerely,



Kris McFadden
Deputy Director

Enclosure: City of San Diego Non-Traditional Small MS4 Permittees Expansion Table

Cc: Almis Udrys, Deputy Director, Office of the Mayor
Garth K. Sturdevan, Director, Transportation & Storm Water Department
Ruth Kolb, Program Manager, Transportation & Storm Water Department

City of San Diego Non-Traditional Small MS4 Permittees Expansion Table

Entity	Watershed	Justification
North County Transit District	Los Penasquitos Lagoon	California Regional Water Quality Control Board, San Diego Region, Resolution R9-2012-0033, a resolution amending the Water Quality Control Plan for the San Diego Basin Region (9) to incorporate the Total Maximum Daily Load for sedimentation in the Los Penasquitos Lagoon. Adopted on June 13, 2012.
San Diego Metropolitan Transit System	San Diego Bay - Switzer Creek	California Regional Water Quality Control Board, San Diego Region, Resolution R9-2012-0033, listed this waterbody as impaired for benthic community degradation and sediment toxicity. The Regional Board is currently working a TMDL and Basin Plan Amendment for PCBs, PAHs, and Chlordane.
University of San Diego	San Diego River	California Regional Water Quality Control Board, San Diego Region, Resolution R9-2012-0033, listed this waterbody as impaired for <i>Enterococcus</i> , fecal Coliform, low dissolved oxygen, nitrogen, phosphorus, and total dissolved solids.
San Diego City College	San Diego Bay – B Street drainage	California Regional Water Quality Control Board, San Diego Region, Resolution R9-2012-0033, listed this waterbody as impaired for benthic community degradation and sediment toxicity.
Mesa Community College	Mission Bay – Tecolote Creek	California Regional Water Quality Control Board, San Diego Region, Resolution R9-2012-0033, listed this waterbody as impaired for cadmium, copper, indicator bacteria, lead, nitrogen, phosphorus, selenium, toxicity, turbidity, and zinc.

Entity	Watershed	Justification