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Secretary for
Environmental Protection

California Regional Water Quality Control Board San Diego Region

Over 50 Years Serving San Diego, Orange, and Riverside Counties
Recipient of the 2004 Environmental Award for Outstanding Achievement from U.S. EPA



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Distribution List (Electronic)

REGIONAL PREPARATIONS FOR THE 2009-10 RAINFALL SEASON THROUGHOUT THE SAN DIEGO REGION

Dear MS4 Copermittees:

This letter is a notification to all storm water agencies and entities regulated by the municipal, construction and industrial storm water permits. I urge all members of the regulated community to take all practicable actions to prepare for the FY 2009-10 rainfall season, which begins October 1. The municipal storm water NPDES permit requires that you implement such best management practices to the maximum extent practicable to reduce discharges of waste into our regional waters. It has been many months since our last significant rainfall event, with current predictions anticipating a strong El-Niño winter. The accumulation of pollutants and debris since the last rainfall event this spring presents both a challenge and an opportunity for our Region. The challenge lies in the accumulation of trash and other wastes in your storm drain system that will be swept downstream with the first flush of the first significant rainfall. The opportunity is that a few weeks remain to cleanup areas tributary to your storm drain system and to remove accumulated waste within your storm drain system. There is increasing focus on the protection of our inland waters, bays and estuaries as well as a growing awareness of the need to reduce waste discharges to the ocean. In addition to the need to remove waste from your storm drain system, I strongly recommend that you consider specifically the following actions to prepare for the coming rains.

Construction Sites

There are many active and inactive construction sites in our Region that need new and replacement erosion-prevention measures. Sites with disturbed soils where construction has been halted due to the slowdown in the building industry are particularly vulnerable to runoff problems. Each Copermittee needs to take action to locate and assess construction sites to ensure that the responsible parties prepare the sites prior to the first significant rainfall. At active construction sites, the same actions are equally critical in protecting receiving waters from sediment discharges.

Residential Areas

In many residential areas, significant amounts of debris have accumulated in the curbs and gutters that will be washed into the receiving waters with the first significant rainfall. An aggressive pre-rain season campaign is necessary to involve the residential owners

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to cleanup their properties and the adjacent curbs and gutters to remove any trash, sediment or landscaping debris to prevent it from being washed into the storm drains and creeks. The use of street sweepers and vac-trucks are also an effective means to remove wastes from streets, curbs and catchments. It is far more efficient and beneficial to remove wastes from the pavements, curbs and catchments than from the creeks, lagoons and bays. If these wastes are discharged into these receiving waters, the impact is extremely difficult and costly to mitigate.

Industrial Areas

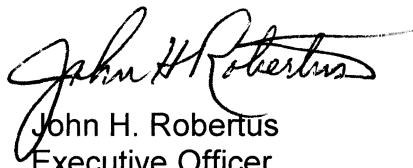
Fortunately, the operators of many industrial activities in the Region are participating in the State industrial storm water permit. Even so, a significant number are not. As mentioned earlier, many consecutive dry months have resulted in the need to assess the level of preparation for the initial rainfall. These sites need to be cleaned and protective measures taken to prevent potential discharges of waste. Industrial site owners need to be urged to make an extra effort to attend to this concern.

Commercial and Public Areas

Shopping centers, parks and other public areas should be inspected to ensure that measures are taken to prevent the discharges of trash, debris and sediments caused by urban runoff. Some of these areas have runoff treatment devices that require maintenance and service prior to the first significant rainfall. Property managers should be advised to ensure that parking areas and boundary areas are given particular attention to ensure that wastes have been removed to the extent practicable along fence lines, swales and ditches.

The Regional Board appreciates your past efforts to prevent the discharges of waste to our receiving waters. I intend to step up monitoring and surveillance of all municipal, industrial and construction sites in the Region. Prior to the first significant rainfall event, I will notify you of any sites found in need of cleanup or preparation actions. We hope to share information to make the best use of scant resources. As the rain season progresses, we will pursue enforcement actions for failures to take these prudent preventative measures, particularly if there are resulting discharges of trash, sediments or excessive debris. I hope you will join with the Regional Board in this campaign of preparation and information distribution for this significant rainfall season.

Sincerely,



John H. Robertus
Executive Officer

California Regional Water Quality Control Board, San Diego Region