



# CITY OF ORANGE

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## PUBLIC WORKS DEPARTMENT

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March 7, 2012

Santa Ana Regional Water Quality Control Board  
3737 Main Street, Suite 500  
Riverside, California 92501-3348

Submitted via email: [dwoelfel@waterboards.ca.gov](mailto:dwoelfel@waterboards.ca.gov)

Attention: Dave Woelfel

Subject: Basin Plan Amendments to Revise Recreation Standards for Inland Fresh Surface Waters in the Santa Ana Region

Dear Mr. Woelfel:

The City of Orange is pleased to support the adoption of the proposed Basin Plan Amendments to revise recreation standards for inland fresh surface waters in the Santa Ana Region.

The City has participated in the Stormwater Quality Standards Task Force's efforts to review water quality standards related to swimming and recreational uses in the region's streams and rivers. Since 2003 the Task Force has been engaged in a multi-year cooperative effort involving a wide range of stakeholders to evaluate the science underlying water quality criteria for bacteria. It has conducted comprehensive evaluations of the ability of the region's water bodies to support swimming and other recreational uses and considered a wide range of potential implementation options.

The body of work completed by the Task Force is impressive: a complete inventory of watershed water bodies; identification of the physical parameters of watershed's channels (lined, earthen, etc.); conducting a recreational use and field survey and collecting over 500,000 photographs. We believe all these



efforts will help assure that human health is protected within our region and that public resources will be expended reasonably and fairly in the proposed Basin Plan Amendments.

The proposed Basin Plan Amendments update the region's water quality objectives for indicator bacteria to conform to USEPA's recommended criteria and the amendments incorporate a narrative objective to assure that waste discharges do not contain human pathogens at levels that will increase the risk of illness. The proposed changes recognize a tiered system where some waters are commonly used for swimming and other recreational activities, while others are used infrequently, if at all. Finally, the proposed amendments acknowledge that recreational activities are unsafe in some streams during wet weather and regulate those streams accordingly.

The City of Orange commends the Santa Ana Regional Board for its efforts with the Stormwater Quality Standards Task Force. This comprehensive effort has established a firm scientific foundation for much-needed changes to the Region's Basin Plan and has done so in a manner that is open and transparent.

We thank you for your consideration of our comments and congratulate you for your commitment to environmental protection, sound science, and prudent public policy. If you have any questions or require additional information please contact Gene Estrada at 714-744-5547.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joe DeFrancesco', with a long horizontal line extending to the right.

Joe DeFrancesco  
Director, Public Works

cc: John Sibley, City Manager  
Chris Crompton, Manager, Environmental Resources