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SINCE 1933

**ORANGE COUNTY WATER DISTRICT**

ORANGE COUNTY'S GROUNDWATER AUTHORITY

**Public Comment**  
**Rec. Std. Amend - Santa Ana RWB**  
**Deadline: 10/1/12 by 12 noon**

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October 1, 2012



Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

Dear Ms. Townsend:

Re: Comment Letter – Recreational Standards Amendments by the Santa Ana Water Board

The Orange County Water District (OCWD, the District) wishes to express support for the proposed Basin Plan Amendment related to recreation uses (REC1 and REC2) and the associated water quality objectives. We commend the Santa Ana Regional Board staff on their extraordinary collaboration with stakeholders in the Stormwater Quality Standards Task Force, and the diligence the staff and the Task Force have shown in developing these recommendations since 2003.

The proposed Basin Plan amendment will clarify the definitions of contact and noncontact recreation and change the water quality objectives from using fecal coliform as the indicator to *E.coli*, as recommended by federal and State agencies. In addition, the proposed changes include a high-flow suspension when such flows are unsafe for recreation and the de-designation of the REC1 use in several water bodies based on Use Attainability Analyses. These changes are important because they enable the region to focus on protecting recreational uses when and where they actually occur.

The current regulatory approach to protecting the recreation beneficial use has not reflected the fact that recreation only occurs in certain kinds of water bodies. This has diluted efforts and reduced the ability to focus on places where risks are real. The aim of the proposed Basin Plan amendment is to improve water quality while targeting regulatory efforts to maximize protection of public health.

Protection of water quality in the Santa Ana Watershed is a central concern for OCWD as water from the Santa Ana River is the primary supply of water for recharging the Orange County Groundwater Basin. These proposed changes do not alter the level of

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wastewater treatment required for wastewater discharges to the Santa Ana River and as such maintain the current level of water quality protection.

The proposed changes are within the law as it has been interpreted by the US Environmental Protection Agency and the State Water Resources Control Board. This new and better approach will actually improve our protection of public health and the beneficial use of waters of the State, while also giving dischargers, particularly municipalities, a clear and achievable path to compliance. OCWD supports the adoption of the proposed Basin Plan Amendment. If there are questions regarding this letter, please contact Greg Woodside at 714-378-3275 or [gwoodside@ocwd.com](mailto:gwoodside@ocwd.com).

Sincerely,



Michael R. Markus, P.E.  
General Manager