



February 27, 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)

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

Dear Mr. Woelfel,

The City of Irvine 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. We recognize the efforts the Stormwater Quality Standards Task Force and appreciate the multi-year effort involving a wide range of stakeholders to evaluate the science underlying water quality criteria for bacteria, conduct comprehensive evaluations of the region's water bodies and consider a wide range of potential implementation options.

We believe that the proposed Basin Plan Amendments will help assure that human health will be protected within our region and that public resources will be expended reasonably and fairly. The Basin Plan Amendments update the region's water quality objectives for indicator bacteria to conform with 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 that 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 Irvine commends the Santa Ana Regional Board for its efforts with the Stormwater Quality Standards Task Force. This comprehensive, collaborative 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. Please contact me at 949-724-6315 or [acarr@cityofirvine.org](mailto:acarr@cityofirvine.org) if you require additional information.

Sincerely,

A handwritten signature in blue ink that reads "Amanda Carr". The signature is written in a cursive style with a light blue shadow effect behind the text.

**Amanda Carr**  
**Water Quality Administrator**