

February 21, 2012

Ms. Carole Beswick
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501

Re: Proposed Basin Plan Amendment Related to Recreational Uses

Dear Chair Beswick:

This letter is to express San Bernardino Valley Municipal Water District's support for the proposed Basin Plan Amendment related to recreation uses (REC1 and REC2) and the associated water quality objectives. We commend your staff on their extraordinary collaboration with stakeholders in the Stormwater Quality Standards Task Force, and the diligence your 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 using E.coli, as the federal and State agencies have recommended. More importantly, the proposed changes include a high-flow suspension when flows are too 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.

We all support water quality, and the ability to recreate in and around our water bodies without unreasonable fear of illness is a hallmark of our federal and State water quality laws. At the same time, our 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 our efforts and reduced our ability to focus on places where risks are real.

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. The proposed Basin Plan Amendment is therefore good public policy. Compliance will still require significant investments, but those expenditures can at least be made in a more effective manner. The Basin Plan Amendment will result in water quality standards that are more appropriate than the existing standards.

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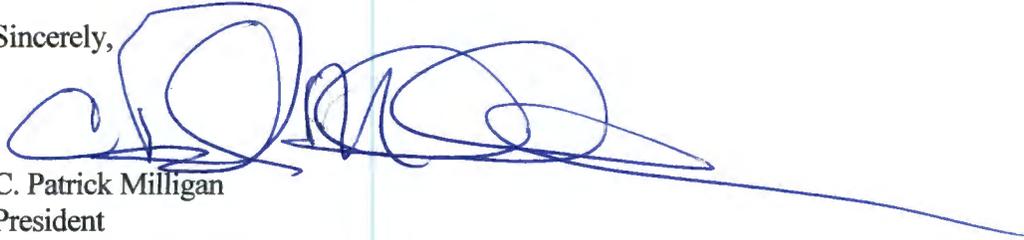
STEVE COPELAN
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DOUGLAS D. HEADRICK
General Manager

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San Bernardino Valley Municipal Water District supports the adoption of the proposed Basin Plan Amendment. If there are questions regarding this letter, please contact our General Manager, Douglas Headrick, at 909-387-9226.

Sincerely,

A handwritten signature in blue ink, consisting of several large, overlapping loops and a long horizontal stroke extending to the right.

C. Patrick Milligan
President

cc: Kurt Berchtold