



CITY OF ORANGE

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April 21, 2011

Mr. Kurt Berchtold
Executive Officer
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, CA 92501-3348

Subject: Agenda Item 12 April 22, 2011 – Consideration of Model Water Quality Management Plan (WQMP) and Technical Guidance Document – Permit No. R8-2009-0030 and Amendment R8-2010-0062

Dear Mr. Berchtold:

At its April 22, 2011 meeting the Santa Ana Regional Board will consider Agenda Item 12 to recommend approval to the executive officer the County of Orange's, Orange County Flood Control District and the Incorporated Cities of Orange County Model Water Quality Management Plan (WQMP) and Technical Guidance Document.

These land development documents have been developed over the last two years by the Orange County Permittees and represent a significant effort and a major program change in the treatment of storm water in Orange County by trying to retain most water on site where feasible as required by the municipal permit. Due to the complexity of the program, the County and cities have engaged in a number of meetings over these two years to develop a program that is implementable and meets the requirements of the permit. Outreach efforts were also made to building organizations, environmental organizations, special districts, EPA, regional board staff and others who have an interest in the program and their comments considered in the preparation of these documents.

While the new program will present significant challenges to Orange and other County cities, particularly in implementing the requirements in redevelopment projects, we believe the documents represent the Permittees best effort to meet the land development requirements of the Orange County permit. Therefore, we urge the Regional Board to recommend approval of the documents as submitted, along with the suggested revisions provided by the County of Orange.

Sincerely,



Joe Joe DeFrancesco
Public Works Director

cc: John Sibley, City Manager
Chris Crompton, Manager, OC Public Works Environmental Resources