

CALLEGUAS CREEK



A COOPERATIVE STRATEGY FOR RESOURCE MANAGEMENT & PROTECTION

October 1, 2012

State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

ATTN: Ms. Jeanine Townsend, Clerk to the Board

Submitted electronically to commentletters@waterboards.ca.gov

COMMENTS ON THE PROPOSED APPROVAL OF THE RECREATION STANDARDS AMENDMENTS BY THE SANTA ANA WATER BOARD

Dear Ms. Townsend:

The Stakeholders Implementing TMDLs in the Calleguas Creek Watershed (Calleguas Creek Stakeholders) support the proposed adoption of the *Amendments to the Water Quality Control Plan for the Santa Ana River Basin to Revise Recreational Standards for Inland Fresh Surface Waters in the Santa Ana Region* (Amendments). The Calleguas Creek Stakeholders believe the proposed Amendments would provide greater public health and beneficial use protection because they properly prioritize the waterbodies most likely to be used for recreation. This will allow stakeholders to focus their limited resources to maximize human health and beneficial use protection impact.

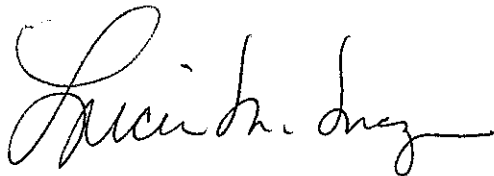
The Calleguas Creek Stakeholders have consistently supported and suggested actions in the Los Angeles Region that are consistent with the approach taken by the Santa Ana Regional Board to evaluate and protect recreational uses. This support has included comments on the past two triennial reviews for the *Water Quality Control Plan for the Los Angeles Region* (Los Angeles Basin Plan) to prioritize evaluation of recreational uses and implement Basin Plan changes, similar to the Amendments. Through adoption of the Amendments, the State Board has the

opportunity to recognize and support efforts being taken in other regions to evaluate and protect recreational beneficial uses.

The Calleguas Creek Stakeholders appreciate the immense effort and cooperation undertaken by Santa Ana Regional Board staff and the diverse group of stakeholders involved to develop the proposed Amendments. As a proactive stakeholder group that has developed stakeholder-driven Total Maximum Daily Loads (TMDLs) in cooperation with the Los Angeles Regional Board and United States Environmental Protection Agency (USEPA), the Calleguas Creek Stakeholders understand the improvement to implementation commitment created by initiating a stakeholder-driven process. In the current example, the Santa Ana stakeholders appear committed to implementing the agreed upon actions because they have chosen and described the actions necessary to support beneficial use protection. The Calleguas Creek Stakeholders support the State Water Resources Control Board (State Board) adopting the Amendments to honor the substantial commitments of the Santa Ana Regional Board staff and stakeholders to recommend justified, scientifically based, and legal water quality standards. Furthermore, approving the Amendments will start timely implementation actions, thereby protecting our resources.

On behalf of the Calleguas Creek Stakeholders, thank you for the opportunity to submit comments regarding the proposed approval of the *Amendments to the Water Quality Control Plan for the Santa Ana River Basin to Revise Recreational Standards for Inland Fresh Surface Waters in the Santa Ana Region* by the State Board. The Calleguas Creek Stakeholders encourage the State Board to approve the Amendments because the Amendments will provide stakeholders the ability to utilize their limited resources to protect human health and beneficial uses in the most efficient and effective means, a benefit to any watershed. If you have any questions you may contact me at by telephone at (805) 388-5334, or by e-mail at lmcgovern@ci.camarillo.ca.us.

Sincerely,



Lucia M. McGovern
Chair, Management Committee
Stakeholders Implementing TMDLs on the Calleguas Creek Watershed