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October 1, 2012

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

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



Subject: Comment Letter—Recreation Standards Amendments by the Santa Ana Regional Board

Dear Ms. Townsend:

OC Public Works has actively supported and participated in the Stormwater Quality Standards Task Force since it was formed in 2003. After many years of effort, it is gratifying to see the proposed Basin Plan Amendments to revise recreation standards for inland fresh surface waters in the Santa Ana Region being considered for adoption by the State Water Resources Control Board. We support the proposed revisions as an appropriate programmatic approach for recreation standards.

The Task Force process included a wide range of stakeholders, allowing important issues underlying water quality criteria for recreation in fresh waters to receive much greater in-depth attention than would otherwise be possible. The Task Force also collected extensive data, conducted comprehensive evaluations of the science underlying water quality criteria for bacteria, reviewed the ability of the region's water bodies to support swimming and other recreational uses, and considered a wide range of potential implementation options. The proposed Basin Plan Amendments, as a result of this intensive effort, will help assure that human health is protected within our region and that public resources will be expended reasonably and fairly.

The Basin Plan Amendments will update the region's water quality objectives for indicator bacteria to conform to USEPA's recommended criteria, and 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 also 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. This latter factor is particularly important for our organization which manages flood control facilities.

The engagement of Santa Ana Regional Board staff in the Task Force was vital for the success of the collaborative basin planning effort. This comprehensive 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. Regulated entities in the Santa Ana Region will be able to focus resources on protecting the beneficial uses of inland waters where recreation occurs, and in doing so, more effectively protect human health. I strongly urge your support of the Basin Plan Amendment at your meeting on October 16.

If you require additional information, please feel contact Mary Anne Skorpanich at (714) 955-0601.

Very truly yours,

John M. W. Moorlach
Chairman, Board of Supervisors