



CLEAN WATER NOW
is an innovative,
science-based
organization
committed to
solution-oriented
collaboration as a
means of developing
safe, sustainable
water supplies and
preserving healthy
ecosystems.

**To: San Diego Regional Water Quality Control Board (SDRWQCB)
Region 9 California EPA**

Attention: Joann Lim

Date: November 1, 2014

SUBJECT:

Tentative Order No. R9-2014-0105, Amending Order No. R9-2012-0012, NPDES Permit No. CA0107417, Waste Discharge Requirements for the South Orange County Wastewater Authority (SOCWA), Discharge to the Pacific Ocean through the San Juan Creek Ocean Outfall

Tentative Order No. R9-2014-0098, Amending Order No. R9-2012-0013, NPDES Permit No. CA0107611, Waste Discharge Requirements for the South Orange County Wastewater Authority (SOCWA), Discharge to the Pacific Ocean through the Aliso Creek Ocean Outfall

COMMENTS:

Clean Water Now (herein CWN) appreciates the opportunity to provide its input regarding the aforementioned Waste Discharge Requirements (WDR) for the two (2) South Orange County ocean outfalls within the SDRWQCB's jurisdiction.

CWN is especially appreciative of the Board's path moving forward regarding implementation of a unified beach water quality monitoring and assessment program in South Orange County.

CWN believes that like the NPDES Stormwater Permit evolution, unifying such permits constitutes both economic as well as regulatory streamlining.

Watchdog protectionist, non-governmental groups (NGOs) like CWN, i.e., grass roots organizations that rely greatly upon uncompensated volunteers, also benefit from such "bundling" because it simplifies, hence expedites valuable time for both the public review and oversight processes.

CWN feels that these types of unified programs are as protective, reasonable, and equitable as the now existing multiple permits. We feel that they meet, or go

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beyond meeting, the requirements for beach water quality monitoring and related public notification and reporting established by State law.

We do encourage the SDRWQCB to remain vigilant regarding ocean outfall monitoring and WDR, especially toxicity-related constituents relating to the Ocean Plan. That said, we see little if any connection, any correlation between South OC ocean outfalls and chronic AB 411 exceedances at our beaches near-shore recreational zones.

A time whose idea has come, we look forward to working with the SDRWQCB staff and other stakeholders to progress the general unified program concept that we consider a welcomed new direction for all.

We do have one (1) concern that has bothered us from inception in 1998: CWN does not feel that the South Orange County ocean outfalls are having any impact on AB 411 exceedances. They obviously affect and should be held responsible for WDR under the California Ocean Plan.

CWN strongly believes that it is in fact urban runoff that causes the overwhelmingly greatest impairment at MS4 outfalls: Whether they are discharged upstream in the watersheds and find their way via watercourses to the beach or discharge directly from MS4s in coastal communities into the receiving waters of the Pacific.

CWN has reviewed recent monitoring and sampling test results from the numerous South OC stations during dry weather provided by the SOCWA and is disturbed by the across-the-board frequency percentages in which South OC surf zones fail to meet AB 411 (FIB) standards. These are NPDES Stormwater Permit-related issues.

CWN does support increased monitoring requirements by the SDRWQCB, to be performed by all local lead agencies designed to focus upon toxicity, including Persistent Organic Pollutants (POPs) and Contaminants of Emerging Concern (CECs).

From the desk of:

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