June 5, 2009

John Robertus, Executive Director
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Ct., Ste. 100
San Diego, CA 92123

Dear Mr. Robertus:

I am writing on behalf of the City of Laguna Beach to comment on Tentative Order #R9-2009-0002 and Permit #CAS0108740 which applies to the cities of South Orange County and the unincorporated portion of the County.

First, the City Council wishes to compliment the Regional Board and its staff for your efforts to reduce urban runoff and enhance water quality. Our city is fully committed to aggressively pursue all reasonable efforts to improve the quality of the water in our creeks and the ocean.

The Council believes that your Board should adopt a permit which authorizes projects which provide for the diversion of nuisance water during dry weather into treatment facilities, whether they be existing sewer treatment plants or specialized programs to cleanse water in a creek. When filtration is employed to reduce bacteria and other pollutants, it should be allowed either at the source, i.e. before the pollutants enter a waterway, or at the end of the line before a creek empties into the ocean since our beaches afford a significant water contact recreational venue for thousands of Southern California residents.

In supporting efforts to improve water quality in our creeks and ocean, the Council is also concerned about the cost of some of the proposed measures. Our small community is expecting a $2 million "borrowing" of our property tax revenues by the State this year. At the same time, we are experiencing significant decreases in revenues from the sales tax and transient occupancy tax. We believe that virtually all governmental agencies in California are experiencing similar austerity. Therefore, the Board should carefully examine provisions of the proposed order to ensure that the proposed measures are both effective in reducing pollutants and reasonable in expense.

Sincerely,

Kelly Boyd

Kelly Boyd
Mayor

cc: City Council