



ORANGE COUNTY  
**COASTKEEPER**®

3151 Airway Avenue, Suite F-110  
Costa Mesa, CA 92626  
Phone 714-850-1965  
Fax 714-850-1592  
www.coastkeeper.org

May 9, 2017

Sent via email: sandiego@waterboards.ca.gov

Regional Water Quality Control Board – San Diego Region  
ATTN: Erica Ryan  
2375 Northside Drive, Suite 100  
San Diego, CA 92108-2700

**RE: SUPPLEMENTAL - PIN 794813, Comments on Complete South Orange County (San Juan Hydrologic Unit) Water Quality Improvement Plan and Technical Guidance Manual**

Dear Ms. Ryan:

Orange County Coastkeeper (“Coastkeeper”) is a nonprofit clean water organization with the mission to protect and promote water resources that are swimmable, drinkable, fishable, and swimmable. Coastkeeper has over 2,000 members who live and/or recreate in and around Orange County’s watersheds. On May 8, 2017, Coastkeeper submitted comments on the Complete South Orange County (San Juan Hydrologic Unit) Water Quality Improvement Plan (“WQIP”) and Technical Guidance Manual. This letter seeks to supplement our initial letter by including a recommendation for additional focus on Marine Protected Areas (“MPAs”) in the WQIP.

Coastkeeper has been a long-term regional proponent of the development and protection of MPAs in southern California. Large sections of coastal south Orange County are designated as MPAs. These areas are acknowledged in the MS4 permit and Appendix A, Figure A-13, of the WQIP. Missing are any deliverables in the WQIP to focus on improving water quality of MPAs.

Coastkeeper recommends the WQIP be modified to require the establishment of an independent review panel of relevant water quality and marine experts within twelve months of WQIP adoption. The review panel should be empowered to review existing scientific documents and materials in order to develop a science-based framework for management of MS4 discharges through the south Orange County subregion to ensure WQIP management goals and actions are consistent with and support MPA objectives. Deliverables should include recommendations related to management and monitoring methods linked to numeric goals, identification of data and/or research gaps and appropriate adaptive management steps and processes.

Coastkeeper appreciates the Regional Board’s focus on these important issues and anticipate our supplemental comments will be included in the record. Please do not hesitate to contact me with any questions you might have after reading our comment letter. Thank you for you participation in this important endeavor.

Sincerely,

Colin Kelly  
Senior Staff Attorney  
Orange County Coastkeeper

