



September 7, 2018

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814
By e-mail: commentletters@waterboards.ca.gov



RE: Comment Letter – Santa Ana Region Newport Bay Selenium TMDL

Dear Ms. Townsend:

The County of Orange (County) appreciates the opportunity to provide comments on the proposed approval of the Santa Ana Regional Water Quality Control Board’s (Regional Board) amendment to the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan) that would incorporate Total Maximum Daily Loads for Selenium in Freshwater, Newport Bay Watershed, Orange County, California (Basin Plan Amendment or BPA).

This Basin Plan Amendment represents nearly 15 years of collaborative efforts of stakeholders at the federal, state, and local levels to better understand and develop solutions for the technical and regulatory challenges of addressing selenium, particularly as applied in the Newport Bay watershed. These efforts commenced in 2004, primarily through the Nitrogen and Selenium Management Program (NSMP), and have included the United States Environmental Protection Agency (EPA), United States Geological Survey (USGS), United States Fish and Wildlife Service (USFWS), State Water Resources Control Board (State Board), Regional Board, the County and nine watershed cities, water providers, environmental groups, and the business community. We commend the leadership and diligence of the Regional Board staff and note our appreciation for the stakeholder process.

The County encourages State Board adoption of this BPA, as, due in large part to being a product of significant stakeholder engagement, the BPA presents an improvement to existing regulations concerning Selenium for the freshwater portions of the Newport Bay Watershed.

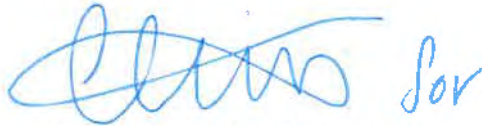
The County and the local NSMP Funding Partner agencies have already invested significant resources for selenium removal in the Newport Bay Watershed, prior to the approval of the TMDL by the State Water Board, Office of Administrative Law, and EPA, and therefore prior to the effective date of this TMDL. Examples of key projects already implemented for selenium removal include the Peters Canyon Pipeline, Santa Ana-Delhi Diversion (when completed), and Big Canyon Wash Diversion. These projects and the proactive implementation efforts

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demonstrate the commitment of watershed stakeholders to addressing selenium in the freshwater portions of the Newport Bay Watershed.

If you have any questions, please contact me at (714) 955-0630.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Chris Crompton" followed by a stylized flourish.

Chris Crompton, Manager
Water Quality Compliance

Cc: NSMP Funding Partners