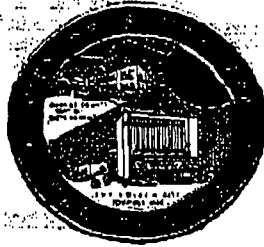


8.4

MAYOR
 Miguel A. Pulido
 MAYOR PRO TEM
 Patricia A. McGuigan
 COUNCILMEMBERS
 Claudia C. Alvarez
 Lisa Bist
 Alberta D. Christy
 Brea Franklin
 Jose Solorio



CITY OF SANTA ANA

CITY MANAGER
 David N. Ream
 CITY ATTORNEY
 Joseph W. Fletcher
 CLERK OF THE COUNCIL
 Patricia E. Healy

May 23, 2002

Mr. Craig J. Wilson, Chief
 Monitoring and TMDL Listing Unit
 Division of Water Quality
 State Water Resources Control Board
 P.O. Box 100
 Sacramento, CA 95812-0100

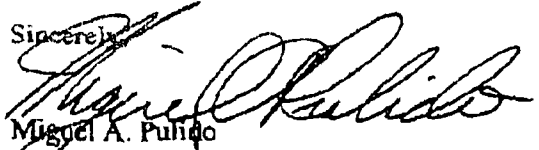
SUBJECT: PROPOSED ADDITION OF SANTA ANA - DELHI CHANNEL TO THE 303(D) LIST

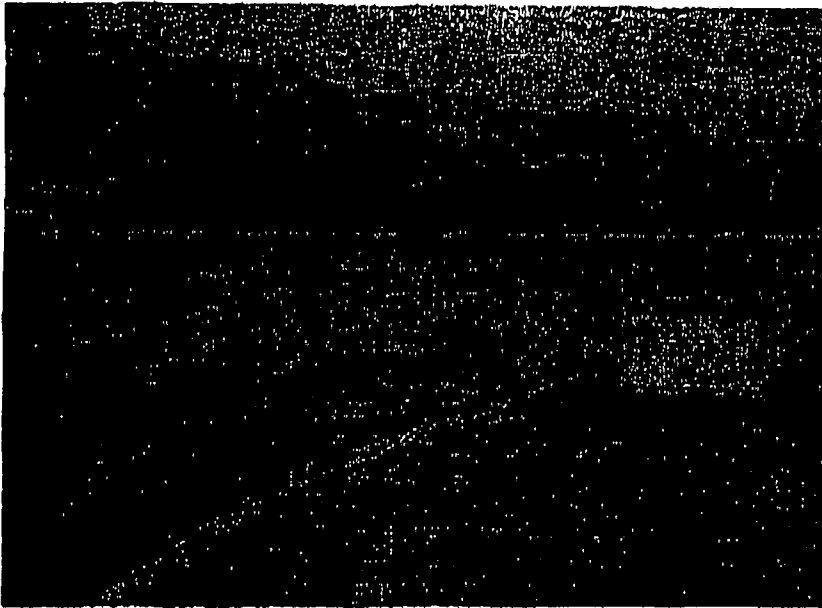
Dear Mr. Wilson:

The City of Santa Ana wishes to express serious concerns with the pending State Water Resources Control Board's proposal to add the Santa Ana - Delhi Channel to the impaired waters list for the Santa Ana region (Clean Water Act Section 303(d) list). The City supports the Board's efforts to create a safe environment for the general public and we are diligently implementing the best management practices available to reduce pollution in our storm water systems. However, it is the opinion of the City of Santa Ana that the proposal to designate and assign municipal water supply use, and contact and non-contact recreation uses (REC-1 and REC-2) to the Santa Ana Delhi Channel lacks the proper justifications.

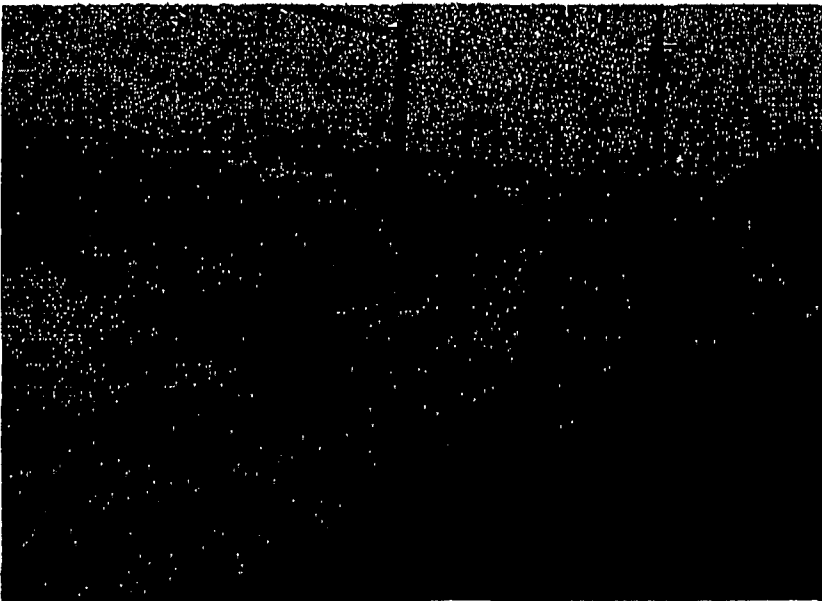
The Santa Ana Delhi channel is the downstream portion of an underground storm drain system that is not even listed in the Regional Board's Basin Plan for the Santa Ana region. The channel originated from an agricultural irrigation ditch, which later on was improved for flood control purposes in the 1940s and lined with concrete and rip-rap in the 1970s. (See Attached Exhibit) The water supply contained within the open portion of this flood control facility is derived from surface runoff. This surface runoff runs through various storm drain systems prior to making its way to the Santa Ana Delhi Channel, which is fenced and posted to keep the public out. To designate its use for activities such as drinking, swimming, hiking or boating is completely impractical and undesirable.

In general, the City recommends that the Regional Board make its overriding priority the review and revision of the beneficial uses and the water quality objectives so that they become relevant and appropriate for use in the stakeholder's storm water cleanup programs. If you should have any questions in regards to our reasoning, please feel free to contact Jim Ross, Executive Director of the Public Works Agency at (714) 647-5654.

Sincerely,

 Miguel A. Pulido
 Mayor



Santa Ana-Delhi Channel
along Sunflower Ave
between Avenue of the
Arts and Bristol St



Santa Ana-Delhi Channel
along Flower St between
Railroad Tracks and
Alton Ave

PHOTO EXHIBIT