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May 24, 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, California 95812-0100

Gerald J. Thibeault  
Executive Officer  
California Regional Water quality  
Control Board, Santa Ana Region  
3737 Main Street, Suite 500  
Riverside, California 92501-3339

Re: Response to solicitation for Water Quality Data; Request for Lake to be  
Added to 303(d) List

Dear Messrs. Wilson and Thibeault:

On May 7, I had the pleasure of meeting Mr. Adelson, Mr. Smythe, and Ms. Schmoker of the California Regional Water Quality Control Board, Santa Ana Region, at their Riverside office. The purpose of the meeting was to gather information regarding our Association's man-made Lake. The Association wanted to know how the Lake was shown in the Santa Ana Region basin plan, the quality of water to be discharged to the Lake by storm drains under the the NPDES permit in which the City of Lake Forest and the County of Orange are co-permittees, and steps we can take to improve the quality of storm drain water discharged to the lake, so that our uses of the lake can be supported.

To better understand our community, I offer the following.

We are a sub-association of a master-planned community located in the City of Lake Forest. Our most important community asset is our 35.5 acre Lake surrounded by the 500 homes, 14 private streets and 9.5 acres of greenbelt of Lake Forest Keys, and the recreational facility for the Master Association, Lake Forest II. The developer, Occidental Land Development, constructed 39" and 18" underground storm drains and three cement above-ground culverts as part of what we believe to be the flood control or storm drain system depositing urban run-off into the Lake. These were accepted by the County of Orange as easements prior to the creation of the City of Lake Forest. The easements became part of the infrastructure for the City in its incorporation in 1991.

Through the years, our 500 members, our five-member Board of Directors, and the Master Association have been very concerned about what effects the run-off has had on the Lake. The Association has learned that our Lake is not shown in the Basin Plan for the Santa Ana Region. No storm drain water quality data is on file at the Regional Board. The Lake is fed, in part, by the City's storm drains. During storms, the Lake overflows to Serrano Creek. The Lake is serving as a sediment basin for the storm water discharges. The sediment and other constituents of the storm water interfere with the fish in the Lake, and with boating.

Our goals as to the quality of the Lake's water and its uses are:

- Elimination of the need to clean up the "first flush" debris each time it rains;
- Reduction or elimination of sediment;
- Elimination of discoloration;
- Elimination of malodorous smells;
- Assurances that water can continue to overflow into Serrano Creek without subjecting the Lake's owners to fines by the Regional Water Quality Control Board or suits by downstream third parties;
- Healthy fish species;
- Electric/Man/Wind powered boating;
- Water fowl and feeding of water fowl.

We have no plans to drink the water, nor are there any plans for body-contact recreational activities.

The Association is requesting the Regional Board's assistance in considering our Lake in the triennial review of the Santa Ana Region's Basin Plan and the State Board's help in adding our Lake to the section 303(d) list.

During our meeting with Regional Board staff May 7, I was asked about the status of Serrano Creek. We know that the Environmental Protection Agency's administrative order entered against our upstream neighbor, the Autumnwood Homeowners Association, is based on EPA's assumption that Serrano Creek is a "water of the United States." We also understand that the U.S. Army Corps has asserted jurisdiction over Serrano Creek. Our Board of Directors became very concerned that a similar action regarding water quality could be taken against Lake Forest Keys due to the accumulation of sediment.

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Mr. Thibeault, Regional Water Quality Control Board

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We currently monitor the Lake on a weekly basis for temperature, clarity, and oxygen. The Association has invested in extensive testing in the past and we have forwarded copies of the test results to Ms. Pavlova Vitale of the Regional Board. Also, as requested in the Notice of Extended Public Solicitation for Water Quality Data and Information, a copy of the test results is enclosed with this request.

The Association is currently seeking programs through Universities that would assist us in identifying what we have now as far as sediment and water make-up.

Thank you for your assistance in processing our request. I look forward to your response.

Sincerely,



Lynnda Anderson  
General Manager

Enclosures

CC:Mr. Mark Adelson, Regional Water quality Control Board, Santa Ana Region  
Ms. Kelly Schmoker, Regional Water quality Control Board, Santa Ana  
Region  
Mr. Mark Smythe, Regional Water quality Control Board, Santa Ana Region