June 13, 2002

Arthur G. Baggett, Jr.
Chairman
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: Proposed Addition of Santa Ana Delhi Channel to 303(d) List under Clean Water Act

Dear Chairman Baggett,

It has been brought to my attention by the city of Santa Ana and the County of Orange that the Santa Ana/Delhi Channel has been recommended by the Santa Ana Regional Water Quality Control Board for placement on the Federal Clean Water Act's 303(d) list of impaired waterbodies.

While supportive of our efforts to create a safe environment with clean water, I am mindful of the use of the best practices to reduce pollution in our storm water systems. However, after reviewing the documentation in support of this request, I have several unanswered questions:

1. Currently, the county of Orange owns the Santa Ana/Delhi Channel and the Channel is concrete lined to carry flows primarily during rainstorms. How could such a Channel be placed on this list, when the regulations, under which it was recommended, pertain to the protection of recreational uses?

2. The data used to place the Channel on the 303(d) list was taken 3 years ago. How can this data be used to establish a designation today when the current environment more likely than not has changed? Does the data apply to the whole Channel or just portions of the Channel?

3. In all the documentation either reviewed online or received from other parties, there appears to be no reference to a cost/benefit analysis. First of all, when is the cost benefit analysis done and if it is, where is it located in statute or regulation? In today's fiscal environment with limited resources we must be diligent in making sure these changes are cost effective.

Until I have received satisfactory answers to these questions, I would request that you remove the Santa Ana/Delhi Channel from the 303(d) list at this time until the matters are resolved. Thank you in advance for your consideration of my request and if you have any questions please contact me.

Sincerely,

Lou Correa
Assemblymember, 69th District

Cc: Craig J. Wilson
Celeste Cantú

Please visit my homepage at: http://democrats.assembly.ca.gov/members/a69/

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