



# CITY OF ORANGE

## PUBLIC WORKS DEPARTMENT

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September 27, 2012



Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

Re: Comment Letter - Recreation Standards Amendments by the Santa Ana Water Board

Dear Ms. Townsend:

This letter supports the State Water Resources Control Board's approval of the amendment of the Santa Ana Regional Water Quality Control Board basin plan with respect to recreation uses. The amendments approved by the Regional Board are the product of a comprehensive stakeholder task force process facilitated by the Santa Ana Watershed Project Authority since 2003.

This deliberation was the most thorough consideration of recreational use standards ever undertaken in California, or perhaps anywhere. Active participants included the major municipal storm water permittees, water and wastewater agencies, environmental advocates, and Regional Board and US EPA staff. The task force's approach has been to work within the existing law, to understand the science underlying the standards, and to agree upon an approach to standards that is appropriate, enforceable, achievable, and that focuses effort on reducing the actual risk of illness.

The amendments will allow local agencies responsible for surface water quality to focus their attention on those areas where recreation actually occurs, thus being more efficient with public resources and likely reducing public health risks. In addition, the amendments expressly acknowledge the continuing requirement to protect beneficial uses not only at a particular location, but downstream from that location. The amendments address only fresh water and therefore do not affect the standards that apply at ocean beaches.

Currently, numeric standards apply everywhere throughout the watershed at all times and without consideration of how the Santa Ana River's highly variable flows affect the risk of exposure. In addition, most storm water quality best

management practices are not effective in achieving the numeric standards, either because they do not effectively remove the bacteria, or because other uncontrollable factors cause exceedences in the water bodies. With the amendments, compliance will still require significant investments, but those expenditures can at least be focused on protecting swimmers where they swim. In addition, the amended standards are achievable. Therefore, the amendments will improve the protection of public health and make the standards more appropriate.

For these reasons, the City of Orange urges the State Board to approve the amendments. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe DeFrancesco". The signature is fluid and cursive, with a prominent loop at the end.

Joe DeFrancesco  
Public Works Director

Cc: Frank Sun, Deputy Director/City Engineer  
Gene Estrada, Environmental Program Manager  
File