

Public Comment Statewide Water Quality Standards Variance Policy Deadline: 2/3/17 12 noon

## A COOPERATIVE STRATEGY FOR RESOURCE MANAGEMENT & PROTECTION



February 3, 2017

Electronic Submission: commentletters@waterboards.ca.gov

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

**Subject:** Comment Letter – Variance Policy – Scoping Comments

Dear Mr. Martorano,

The Stakeholders Implementing Total Maximum Daily Loads in the Calleguas Creek Watershed (Stakeholders) appreciate the opportunity to provide comments on the public scoping meeting documents for the proposed Statewide Water Quality Standards Variance Policy. The Stakeholders commend the State Water Board on its extensive effort to develop statewide REC-1 bacteria objectives, and its current effort to develop a statewide variance policy for inclusion along with the bacteria objectives in the Water Quality Control Plans for Inland Surface Waters, Enclosed Bays and Estuaries and the Ocean Waters of California. The Stakeholders fully support the development of a variance policy and feel that it will complement the other tools and options being considered as part of the policy. The Stakeholders also feel it is important that there be a consistent, statewide approach to developing variances provided by the State Water Board.

The Stakeholders have been actively engaged in implementing and conducting studies necessary to effectively address impaired waters for over a decade. Through that process, we have made significant progress in improving water quality, but have also discovered that some problems require more investigation and regulatory tools to fully address. A variance policy would provide the Stakeholders with time to continue the combination of incorporating emerging science and implementing actions necessary to effectively meet water quality objectives.

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The Stakeholders support development of a variance policy that is open and flexible to address a wide range of water quality objectives, including narrative objectives and a streamlined approach to developing variances for the bacteria objectives.

The Stakeholders look forward to continuing to work with the State Water Board on developing the statewide bacteria objectives and variance policy. Thank you for your time and consideration of these comments. If you have questions, please contact me at (805) 388-5334.

Sincerely,

Lucia McGovern

Lucia M. Maguern

Chair of Stakeholders Implementing TMDLs in Calleguas Creek Watershed