



California Stormwater Quality Association®

Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation

October 1, 2012

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



Subject: Comment Letter—Recreation Standards Amendments by the Santa Ana Water Board

Dear Ms. Townsend:

CASQA 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. Indeed, CASQA has previously commended the work of the Stormwater Quality Standards Task Force (Task Force) for its development of these Basin Plan Amendments (see attached letter of February 27, 2012).

The amendments approved by the Regional Water 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. The Phase I municipal stormwater permittees, water and wastewater agencies, environmental advocates, and Regional Water Board and US EPA staff actively participated in the process. The Task Force's mission was to work within the existing law, to apply available science underlying the standards, and to develop a consensus approach to recreational water quality standards that is appropriate, enforceable, achievable, and that focuses effort on reducing the actual risk of illness.

These amendments will allow local agencies responsible for surface water quality to prioritize and apply available public resources in areas where recreation actually occurs. The local agencies can implement a systematic, prioritized, resource efficient implementation approach that minimizes public health risks. In addition, the amendments expressly acknowledge the continuing requirement to protect beneficial uses not only at a particular location, but also downstream from that location. These 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 whether or not the region's highly modified urban channels are actually used for recreation. In addition, most management programs cannot attain the numeric standards in wet weather because uncontrollable factors cause exceedances in the water bodies. With the amendments, compliance will still require significant investments, but those expenditures can be more precisely focused on achieving regulatory compliance and protecting people where they swim.

CASQA comments on Recreation Standards Amendments by the Santa Ana Water Board

For these reasons, CASQA requests the State Water Board to approve the amendments. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Richard Boon". The signature is written in a cursive style with a large, prominent initial "R".

Richard Boon, Chair - California Stormwater Quality Association

Attachment: CASQA Letter to Santa Ana Regional Water Board – February 27, 2012



California Stormwater Quality Association®

Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation

February 27, 2012

Dave Woelfel
Santa Ana Regional Water Quality Control Board

Subject: Basin Plan Amendments to Revise Recreation Standards for Inland Fresh Surface Waters in the Santa Ana Region

Dear Mr. Woelfel,

The California Stormwater Quality Association (CASQA¹) is pleased to recognize the efforts of the Stormwater Quality Standards Task Force, which was convened in 2003 to review the water quality standards related to swimming and recreational uses in the Santa Ana region's streams and rivers. Through a multi-year effort involving a wide range of stakeholders, the Task Force has evaluated the science underlying water quality criteria for bacteria, has conducted comprehensive evaluations of the ability of the region's water bodies to support swimming and other recreational uses, and has considered a wide range of potential implementation options.

CASQA believes that the proposed Basin Plan Amendments will help assure that human health will be protected and that public resources will be expended reasonably and fairly. The Amendments update the region's water quality objectives for indicator bacteria to conform to USEPA's recommended criteria, and the amendments incorporate a narrative objective to assure that waste discharges do not contain human pathogens at levels that will increase the risk of illness. The proposed changes recognize that some waters are commonly used for swimming and other recreational activities, while others are used infrequently, if at all. Finally, the proposed amendments acknowledge that recreational activities are unsafe in some streams during wet weather and regulate those streams accordingly.

CASQA commends the Santa Ana Regional Water Board for its efforts with the Stormwater Quality Standards Task Force. This model effort has established a firm scientific foundation for the future effective management and protection of highly modified urban streams in the Santa Ana River Watershed and has done so in a manner that is open and transparent.

We thank you for your consideration of our comments and congratulate you for your commitment to environmental protection, sound science, and prudent public policy.

Sincerely,

Richard Boon, Chair - California Stormwater Quality Association

¹ CASQA is comprised of stormwater quality management organizations and individuals, including cities, counties, special districts, industries, and consulting firms throughout California. Our membership provides stormwater quality management services to more than 23 million people in California. CASQA was originally formed in 1989 as the Stormwater Quality Task Force to recommend approaches for stormwater quality management to the California State Water Resources Control Board.