

Directors

PHILIP L. ANTHONY
WES BANNISTER
KATHRYN L. BARR
DENIS R. BILODEAU
RICHARD CHAVEZ
JAN DEBAY
SHAWN NELSON
STEPHEN R. SHELDON
JOSE SOLORIO
ROGER C. YQH



ORANGE COUNTY WATER DISTRICT

Orange County's Groundwater Authority

Officers

PHILIP L. ANTHONY
President

JAN DEBAY
First Vice President

KATHRYN L. BARR
Second Vice President

—

VIRGINIA GREBBIEN
General Manager



July 27, 2006

Mr. Mark Adelson
California Regional Water Quality Control Board, Santa Ana Region
3737 Main Street, Suite 500
Riverside, CA 92501-3339

Subject: Triennial Review of Basin Planning Issues

Dear Mr. Adelson:

This letter is in response to your request for comments on the draft triennial review priority list for the Santa Ana Region Basin Plan.

Protecting the quality of the Santa Ana River is critical to the residents of Orange County and to the Orange County Water District (OCWD). The Santa Ana River is the primary source of groundwater recharge for the Orange County Groundwater Basin, which is the primary water supply for over two million Orange County residents.

OCWD supports the high priority assigned in the draft priority list to considering recommendations of the Storm Water Quality Standards Task Force (SWQSTF). In particular, OCWD requests that the Regional Board place a high priority on adding rationale to the Basin Plan for the 2.2 mpn/100 ml coliform discharge limit for Publicly Owned Treatment Works (POTWs) discharging to the Santa Ana River and its tributaries. In addition to the 2.2 mpn/100 ml coliform limit, the related language in the existing POTW discharge permits regarding tertiary treatment and 5-log virus reduction should be added to the Basin Plan. The 2.2 mpn/100 ml coliform discharge limit for discharges to the Santa Ana River and its tributaries is critical to maintaining the microbial quality of the Santa Ana River and protecting the river's existing beneficial use of groundwater recharge. POTW discharges to the river provide the majority of flow in the river during non-storm periods and the coliform discharge limit is the primary limit that controls the microbial quality of POTW discharges. Adding rationale to the Basin Plan for the coliform limit will help to assure continued protection of the river's microbial quality.

Mark Adelson
July 27, 2006
Page 2 of 2

One item that is not on the draft priority list that is currently receiving an extensive amount of attention in the Santa Ana River Watershed is the use of imported water to recharge groundwater basins and how this recharge relates to the Basin Plan. In April 2006, the Regional Board published tentative Waste Discharge Requirements (WDR) for the recharge of imported water. Based on feedback from stakeholders in the region at the May 19, 2006 Regional Board meeting, the Regional Board has allowed time for a voluntary, collaborative process by the stakeholders that will have the same effect as the tentative WDR, without having to issue the WDR – that is, that information will be provided through a stakeholder-implemented effort to demonstrate that the recharge of imported water is being done in a manner consistent with the Basin Plan. Maintaining high quality water and implementing the Basin Plan are very important to OCWD. Recharge of imported water is also very important to the water agencies in the watershed and to OCWD. Since the workgroup that is now starting to work on this issue may recommend changes to the Basin Plan, this item should be given high priority on the triennial review priority list.

Please call me at 714-378-3220 or Greg Woodside at 714-378-3275 if you would like to discuss these issues further.

Sincerely,



Virginia Grebbien, P.E.
General Manager

I:\Docurment\Planning & Watershed Mgmt\GDW\Intnds\Basin plan triennial review comment letter July 2006.doc

cc: OCWD Board of Directors
Bob Reiter/San Bernardino Valley Municipal Water District
John Rossi/Western Municipal Water District
Rich Atwater/Inland Empire Utilities Agency
Tony Pack/Eastern Municipal Water District
Mark Norton/Santa Ana Watershed Project Authority