



IRVINE COMPANY

Since 1864

March 12, 2012

Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, California 92501-3348

Submitted via email: dwoelfel@waterboards.ca.gov

Attention: Dave Woelfel

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

Dear Mr. Woelfel,

The Irvine Company is pleased to support the adoption of the proposed Basin Plan Amendments to revise recreation standards for inland fresh surface waters in the Santa Ana Region.

We 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 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.

We believe that the proposed Basin Plan Amendments will help assure that human health will be protected within our region and that public resources will be expended reasonably and fairly. The Basin Plan Amendments update the region's water quality objectives for indicator bacteria to conform with 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.

Dave Woelfel
March 12, 2012
Page 2

The Irvine Company commends the Santa Ana Regional Board for its efforts with the Stormwater Quality Standards Task Force. This comprehensive effort has established a firm scientific foundation for much-needed changes to the Region's Basin Plan 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. Please contact Dean Kirk at (949) 720-2878 if you require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "P.P. Hernandez", followed by a long horizontal flourish that ends in a loop.

Paul P. Hernandez
Vice President
Government Relations