



County of Orange
California

September 12, 2014

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento CA 92814



Via email: commentletters@waterboard.ca.gov

Re: Comments on A-2259 – September 23, 2014 Board Meeting. Petition of Foothill/Eastern Transportation Corridor Agency – Waste Discharge Requirements Tentative Order No. R-9-2013-0007 – Tesoro Extension Project – State Route 241

Dear Ms. Townsend,

The County of Orange is undergoing several critical infrastructure projects that are critical to the quality of life and economic growth of our community.

According to the Draft A-2259 Order as proposed: “A regional water board is not required to put on blinders when making a decision concerning the authorization of a discharge of waste that will likely lead to additional discharge of waste or other water quality impacts in the future.”

We would add that a regional water board cannot make assumptions about a future project when the actual details of that project are not before them and cannot be properly evaluated.

This proposed Draft Order puts the process for acquiring necessary permitting for public works projects throughout our county, and others, at risk. I strongly encourage that you change the wording in the Draft Order to disallow your Regional Boards from considering potential project extensions that have not been proposed or perhaps even contemplated by the applicant.

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The Orange County Board of Supervisors (Board) supports the extension of State Route 241 to Interstate 5, which has been on the County's Master Plan of Arterial Highways for more than 35 years. Further, the Board supports issuance of a Waste Discharge Permit for the Tesoro extension as defined. This extension is needed to serve future residents of Rancho Mission Viejo as well as regional traffic now using Ortega Highway.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael B. Giancola", with a stylized flourish at the end.

Michael B. Giancola

County Executive Officer