Public Comment
Rec. Std. Amend - Santa Ana RWB
Deadline: 10/1/12 by 12 noon

CITY OF ONTARIO
303 EAST "B" STREET, CIVIC CENTER ONTARIO CALIFORNIA 91764-4105
(909) 395-2000
FAX (909) 395-2070

PAUL S. LEON
MAYOR

SHEILA MAUTZ
MAYOR PRO TEM

ALAN D. WAPNER
JIM W. BOWMAN
DEBRA DORST-PORADA
COUNCIL MEMBERS

CHRIS HUGHES
CITY MANAGER

MARY E. WIRTES, MMC
CITY CLERK

JAMES R. MILHISER
TREASURER

September 25, 2012

RECEIVED
9-27-12
SWRCB Clerk

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:

As one of the stakeholders of the Stormwater Quality Standard Task Force, the City of Ontario 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. The amendments approved by the Regional Board are the product of the 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. Active participants included the major municipal stormwater permittees, water and wastewater agencies, environmental advocates, and Regional Board and US EPA staff. The task force's approach has been to work within the existing law, to understand the science underlying the standards, and to agree upon an approach to standards that is appropriate, enforceable, achievable, and that focuses effort on reducing the actual risk of illness.

The amendments will allow local agencies responsible for surface water quality to focus their attention on those areas where recreation actually occurs, thus being more efficient with public resources and likely reducing public health risks. In addition, the amendments expressly acknowledge the continuing requirement to protect beneficial uses not only at a particular location, but downstream from that location. The 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 how the Santa Ana River's highly variable flows affect the risk of exposure. In

Printed on recycled paper.

addition, most stormwater quality best management practices are not effective in achieving the numeric standards, either because they do not effectively remove the bacteria, or because other uncontrollable factors cause exceedences in the water bodies. With the amendments, compliance will still require significant investments, but those expenditures can at least be focused on protecting swimmers where they swim. In addition, the amended standards are achievable. Therefore, the amendments will improve the protection of public health and make the standards more appropriate.

For these reasons, the City of Ontario urges the State Board to approve the amendments. Thank you for your consideration.

Sincerely,

Chris Hughes
City Manager