



April 20, 2011

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Mark Smythe
Santa Ana Regional Water Quality Control Board
Attn: Coastal Storm Water Unit
3737 Main Street, Suite 500
Riverside, CA 92501

By electronic mail to msmythe@waterboards.ca.gov

Dear Mr. Smythe:

Subject: North Orange County Draft Model Water Quality Management Plan and Technical Guidance Document; Agenda Item 12, April 22, 2011 Santa Ana Regional Water Quality Control Board Meeting

The Municipal Water District of Orange County (MWDOC) is a wholesale water supplier and resource planning agency. Our efforts focus on sound planning and appropriate investments in water supply development, water use efficiency, public information, legislative advocacy, water education, and emergency preparedness. MWDOC's service area covers all of Orange County, with the exception of the cities of Anaheim, Fullerton, and Santa Ana.

The MS4 stormwater permit and the Draft Model Water Quality Management Plan place great emphasis on on-site Low Impact Development (LID) principles. On-site infiltration of stormwater is one of the approaches to implement LID. **While we are supportive of on-site infiltration in locations that are environmentally sound, we believe that a regional program and on-site LID for the treatment of stormwater will serve both goals of the pollutant removal and water supply more effectively.**

Apart from the fact that the map identifying areas of potential infiltration is constrained by the realities of the built environment (including areas of existing pollution), the area within the Santa Ana Region for the County of Orange is well situated to allow the community to take advantage of infiltration opportunities. Moreover, the stakeholders including the County of Orange, the Orange County Water District and others, are supportive of a regional approach.

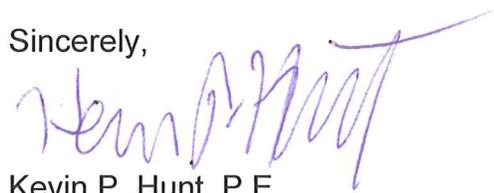
Mr. Mark Smythe
Page 2
April 20, 2011

MWDOC concurs with the following five principles that we have discussed with the Orange County Water District. These principles should be incorporated into the Model WQMP and TGD to provide for effective management of stormwater:

1. Participation in a Board-approved regional alternative compliance program should be permitted along with on-site LID standards.
2. Participation in a Board-approved regional program should be allowed to enhance effectiveness of LID standards.
3. Projects upstream of the regional facility should be allowed to participate in a regional program when located in the same watershed to enhance on-site LID standards.
4. New development or significant redevelopment should be able to use credits created by the removal of the pollutant loads from existing development using regional facilities if the net pollutant removal load is greater than would be achieved on-site.

We appreciate this opportunity to comment on the draft Model Water Quality Management Plan and Technical Guidance Document.

Sincerely,



Kevin P. Hunt, P.E.
General Manager