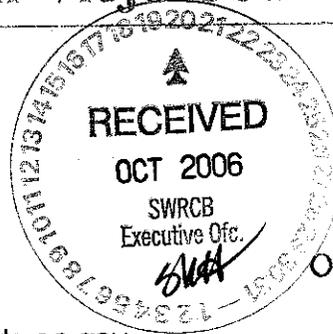


Mission Viejo Country Club

Song Her, Clerk
 State Water Resources Control Board
 1001 I Street
 Sacramento, CA 95814



10/25/06 BdMtg Item 10
 303(d) List
 Deadline: 10/20/06 5pm

October 20, 2006

Via Email: commentletters@waterboards.ca.gov

RE: Comment Letter – 2006 Federal CWA Section 303(d) List

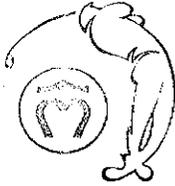
Dear Ms. Her;

Thank you for the opportunity to comment on the proposed 303(d) list. We are commenting on the San Diego RWQCB listing for Oso Creek (at the Mission Viejo Golf Course) on page 12 of 29 of the September 13, 2006 listing document. Specifically, we disagree with the accuracy and characterization of this listing.

First, we acknowledge that the water quality in 4-mile long Oso Creek is impaired. Oso Creek collects urban runoff from over 8 square miles within the City of Mission Viejo. According to the September 2006 Fact Sheets Supporting Revision to the 303(d) list, 13 quarterly samples were collected from 1998-2001 by the Santa Margarita Water District (SMWD) and showed total dissolved solids, chloride and sulfate exceeding water quality objectives. According to SMWD staff, these quarterly samples were collected at the Oso Barrier, located on the last ½ mile of the creek. The purpose of the barrier is to take urban runoff collected by Oso Creek, screen it, and pump it to a reservoir for later use as a reclaimed water source for irrigation. Oso Barrier is located within the boundaries of the Mission Viejo Country Club. Refer to Figure 1.

The proposed listing indicates that 1 mile of the creek is impaired, but the Fact Sheet offers no rationale for this distance. We question the accuracy of this 1 mile distance because only 1 sample site was used and sampling was done at the last ½ mile of an 8.5 mile long creek that collects urban runoff from over 10 square miles of densely populated area containing over 100 catchment basins. Accordingly, we recommend that the estimated size affected be changed to "unknown" until such time as data becomes available to more accurately characterize the length of impairment.

Further, the proposed listing states "Oso Creek (at Mission Viejo Golf Course)", suggesting that it is the golf course that is responsible for the listing. We disagree that the listing has anything to do with the golf course and instead is almost assuredly due to the urban runoff entering Oso Creek upstream of the Oso Barrier. Accordingly, we recommend that the name of the water quality limited segment be changed to "Oso Creek (at Oso Barrier)".



Mission Viejo Country Club

The Mission Viejo Country Club is committed to being a good steward of Oso Creek. For example, we regularly practice numerous Best Management Practices (BMPs) to protect Oso Creek water quality including maintenance of vegetated buffers and restrictions on fertilizer use in the vicinity of the creek. Further, we plan to continue working closely with the County of Orange, SMWD, and the City of Mission Viejo to improve the creek environment.

We appreciate the opportunity to comment on the proposed 303(d) listing. If you have any questions, please do not hesitate to call me.

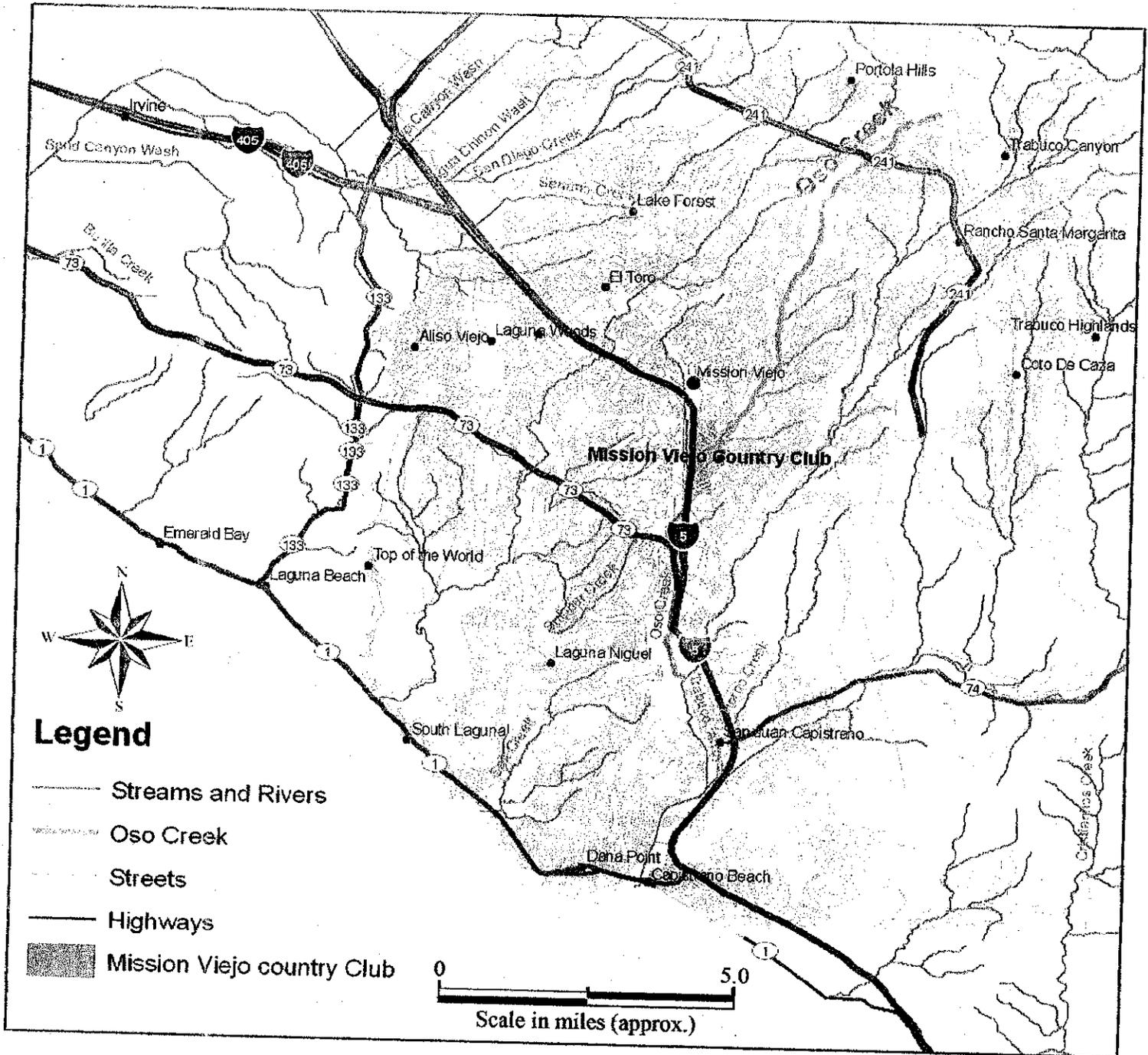
Sincerely,

A handwritten signature in black ink, appearing to read 'Rick Beymer', with a long horizontal flourish extending to the right.

Rick Beymer
General Manager

CC:

Amanda Carr, County of Orange
Richard Schlesinger, City of Mission Viejo
Daniel Ferons, Santa Margarita Water District



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Oso Creek Watershed
 Mission Viejo, California

Project
 Mission Viejo
 Country Club
 Date
 19 Oct. 2006

Figure
1