



Orange County Taxpayers Association

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To: The Honorable Bob Wieckowski, Committee on Environmental Safety and Toxic Materials

From: Reed Royalty, President, Orange County Taxpayers Association (OCTax)

Date: March 8, 2011

AB 262 (Harkey): Regional Water Quality Boards

OCTax Position: SUPPORT

AB 262 would modify the boundaries of the Santa Ana Regional Water Quality Control Board and the San Diego Regional Water Quality Control Board so that all of Orange County would be included in the Santa Ana Region.

OCTax analysis

Presently, Orange County is divided between the Santa Ana and San Diego regions, so that Orange County is governed by two different Water Quality Control Plans, different water quality objectives, monitoring and assessment programs, and water quality management programs. As a result, there are differences in the interpretation, application and enforcement of water quality objectives and programs.

AB 262 would expand the boundary of the Santa Ana Regional Water Quality Control Board southward to Orange County's southern border. It would result in a single National Pollutant Discharge Elimination System (NPDES) permit for the County of Orange to manage in collaboration with its co-permittees (cities), as opposed to managing the two existing NPDES Permits.

AB 262 would save Orange County about \$13 million annually by eliminating processing of duplicative Waste Discharge Requirement (WDR) permits and the costs of education, outreach, water quality monitoring, legal review, interpretation of regulations, and compliance with water quality objectives and programs. It would make permits easier and less expensive to manage.

Other agencies, businesses and developers that are regulated under this program would find it easier to comply with a single program with a single set of rules.