

# COASTKEEPER

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May 9, 2006

Mr. Mark A. Murphy, Mayor  
City of Orange  
300 East Chapman Avenue  
Orange, CA 92886-1591

Dear Mayor Murphy:

Recent newspaper articles and fliers have circulated regarding the City's approval of The Irvine Company's (TIC) development project in East Orange. More specifically, they have alleged the Runoff Management Plan (ROMP) is inadequate and certain aspects are inappropriate. The purpose of this letter is to not to enter the current debate, but to remind the City Council what has been accomplished with the ROMP that is now approved.

The Orange County Coastkeeper at the invitation of both the local Sierra Club and The Irvine Company collaborated for approximately 15 months in designing and developing the ROMP for East Orange. This invitation was based on our expertise in surface runoff, water quality and the fact that we have an established working relationship with TIC that has successfully produced exceptional ROMP's on other projects. Coastkeeper as a policy does not take positions supporting or opposing development projects; we feel that decision is up to the local community. However we absolutely do take positions on ROMP's to ensure they are state-of-the-art and will function over the long-term life of the project in the event a project is approved.

Coastkeeper reviewed the ROMP as originally proposed and the subsequent iterations up to the one ultimately approved, which was the result of numerous modifications and additions. Early in the process we insisted that Handy Creek must not sustain any increased flows from the development of this project, including storm flows. Additionally we insisted that Peter's Canyon Reservoir be remediated to a higher level of water quality standards and made fit to support fish and other aquatic species. Further, we insisted that long term management of the ROMP must have the oversight and direct participation of Irvine Ranch Water District (IRWD) as well as a consulting engineer and not be solely left to the homeowner's association (HOA) board. We suggested the project should infiltrate 100% of the dry weather flows which would result in no urban runoff from the project area and the infiltration should be within the project boundaries.

TIC originally proposed that a large detention basin be constructed on County owned land in the Santiago Creek wash area. We suggested it was more appropriate that water quality structures be constructed within the boundaries of their project. TIC agreed and redesigned the basin to be on their project site. What is currently being described as "waste" being discharged into the county owned park property is actually treated urban runoff after going through vegetated swales and an extended detention

basin and only after significant rain events. The specific area of percolation is an area of the wash where planted foliage did not survive due to the lack of water.

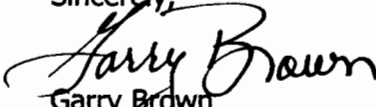
We suggested other modifications, such as: additional bioswales and the construction of an additional extended detention basin in Santiago Hills II and East Orange Area I; a special study of selenium in the immediate area and particularly in the Peters Canyon Reservoir; a long term maintenance agreement with the County of Orange for the proposed aeration system in Peters Canyon Reservoir; and both a construction and post-construction monitoring plan to ensure the ROMP is effective.

Our collaboration with TIC was successful in that it resulted in a ROMP that will achieve significantly higher standards than what is currently required by the County MS4 Permit and will ensure protection to the surrounding community from polluted urban runoff. Important to Coastkeeper is that the proposed ROMP will:

- Capture and infiltrate all dry weather flows before they reach Irvine Lake or Peters Canyon Reservoir.
- Ensure upon project completion flows to Handy Creek will be less volume than the flows before the project was built.
- Ensure that Peters Canyon Reservoir will have improved water quality and will support fish and other aquatic life. This is through the installation of an aeration system that will improve both water mixing and the low dissolved oxygen conditions that currently exist.
- Ensure long-term plan effectiveness with IRWD ownership and management of the 6 major water quality basins included in the ROMP. IRWD will have oversight management authority of all the HOA owned basins.
- Ensure a post-construction monitoring plan to prove the effectiveness of the ROMP.

Coastkeeper's primary focus is on water quality and runoff management. We appreciate the commitment to high water quality standards and effective runoff management that The Irvine Company has agreed to for the East Orange Project. We characterize the ROMP for the East Orange project as one of the most sophisticated for any inland development project. The Orange County Coastkeeper endorses this ROMP as it is now approved.

Sincerely,

  
Garry Brown  
Executive Director

cc. City Council Members, City of Orange  
Community Development Director, City of Orange  
Sat Tamaribuchi, The Irvine Company