



RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

August 21, 2012



Ms. Jeanine Townsend
Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Dear Ms. Townsend:

Re: Comment Letter
Draft Aquatic Weed Control Permit

The Riverside County Flood Control and Water Conservation District appreciates the opportunity to provide comments on the draft Statewide General NPDES Permit for Residual Discharges to Waters of the United States from Algae and Aquatic Weed Control Applications (Draft Permit).

The District has the following comments on the Draft Permit:

- **Order, Table 2, Page 1**
To ensure that the District and other Dischargers have time to prepare the required documents to obtain coverage under the proposed Draft Permit, the District recommends that the Effective Date be set to 12 months after the Adoption Date.
- **Order, Section C.3, Page 4**
The Draft Permit states that "After the application is deemed complete, the State Water Board's Deputy Director of the Division of Water Quality (Deputy Director) will issue a Notice of Applicability (NOA)." However, Section VIII.C states that there is a 30-day posting period for the APAP.

The District recommends also including the 30-day review period in the description of the application process on Page 4 of the Order.
- **Attachment C, Pages C-2 and C-3, Attachment D, Page D-3**
The Draft Permit specifies that Dischargers shall conduct samples in "each environmental settings (flowing water and non-flowing water)." Due to the semi-arid to arid climatic conditions within Riverside County, application events may occur when there is no water present. If there is no water present, please specify if monitoring is required.
- **Attachment C, Table C-1, Page C-6**
Item 4 in Table C-1 specifies "Samples shall be collected at the surface of the waterbody." If there is no water present during the application event, please specify if monitoring is required.

- **Attachment C, Item B.1.b**

The Draft Permit states that the Annual Report shall contain "A summary of monitoring data, including the identification of water quality improvements or degradation, and recommendations for the improvements to the APAP (including proposed BMPs) and monitoring program based on the monitoring results."

Please include language specifying that recommendations for improvement will be based on water quality degradation as a result of the application and if appropriate.

The District also suggests including, if applicable, a discussion similar to text in Page C-11, Attachment D.2.h:

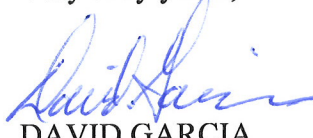
"If applicable, explain why the Coalition or Discharger believes the noncompliance could not have been caused by exposure to the algaecides and/or aquatic herbicides from the Coalition's or Discharger's application."

- **Attachment C, Item D.2.h**

In Item H, Section D.2, Line 3, "and or" should be written as "and/or."

Should you have any questions or need additional information please feel free to contact me at 951.955.1330.

Very truly yours,



DAVID GARCIA
Senior Civil Engineer

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