

WARREN D. WILLIAMS  
General Manager-Chief Engineer

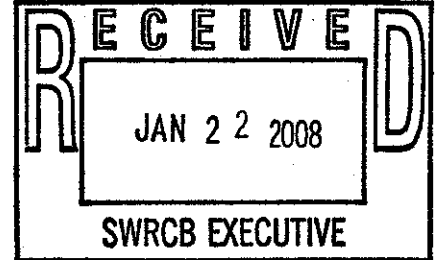


Public Comment  
Coachella Valley TMDL  
Deadline: 1/22/08 by 12 p.m.

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RIVERSIDE COUNTY FLOOD CONTROL  
AND WATER CONSERVATION DISTRICT

January 22, 2008



Ms. Dorothy Rice, Executive Director  
California State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Dear Ms. Rice:

Re: Comment Letter -- Coachella Valley  
Stormwater Channel Bacterial Indicators  
TMDL

The Riverside County Flood Control and Water Conservation District (District) serves as the Co-Principal Permittee on the Riverside County Municipal Separate Storm Sewer System (MS4) Permit for the Whitewater River Region. The District is submitting these comments on behalf of its Co-Permittees.

On May 16, 2007 the Colorado River Basin Regional Water Quality Control Board (Regional Board) conducted a public hearing and adopted the Basin Plan Amendment for the Coachella Valley Stormwater Channel (CVSC) Bacterial Indicators TMDL and Implementation Plan. As a part of the Regional Board's adopting action, the Regional Board indicated that, due to testimony received at the hearing, they would hold three post-adoption workshops with stakeholders to determine both how to move forward on the TMDL and if any amendments to the TMDL would be warranted prior to action by the State Water Resources Control Board (State Board). Subsequently, on November 19, 2007 the Regional Board conducted the second of three workshops to receive comments and hear concerns regarding the subject Basin Plan Amendment, to resolve issues raised during the May 16, 2007 public hearing, and to identify changes that may be needed.

Based on testimony provided during the workshops, Regional Board Members, during their January 16, 2008 meeting, agreed to request the State Board withdraw the subject TMDL from their March 18, 2008 meeting agenda for a period of eighteen (18) months.

The MS4 Permittees support the Regional Board's position to request an 18-month stay of the CVSC Bacterial Indicators TMDL. The MS4 Permittees believe that during the 18-month stay, specific language can be worked out to modify the TMDL Basin Plan Amendment to address various stakeholder concerns, including:

- Incorporation of a public hearing prior to initiation of Phase 2 of the TMDL (necessary to clarify any additional actions required of the MS4 to comply with Waste Load Allocations);
- Incorporation of specific language stating that LAs and WLAs within the TMDL are achieved by 2014; and
- Address other stakeholder concerns raised at the initial workshops.

Ms. Dorothy Rice  
California State Water Resources Control Board  
Re: Coachella Valley Stormwater  
Channel Bacterial Indicators TMDL

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January 22, 2008

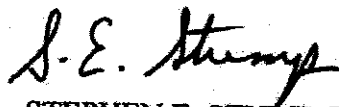
The withdrawal and reconsideration of the CVSC Bacterial Indicators TMDL will provide an opportunity for the Regional Board to work cooperatively with all stakeholders to develop a more thorough and defensible TMDL.

In summary, the MS4 Permittees support the Regional Board's position that it is in the best interests of the Regional Board, all stakeholders and water quality to have the subject Basin Plan Amendment withdrawn from the State Board's meeting agenda for 18 months. This will provide an opportunity for participation by all stakeholders and identification of appropriate actions that will provide meaningful improvement to the water quality in a manner that recognizes local conditions in balance with the value of the beneficial use to be protected.

The MS4 Permittees appreciate the opportunity to provide comments on the CVSC Bacterial Indicators TMDL. The MS4 Permittees also appreciate the opportunity that the Regional Board has provided in holding workshops to hear and resolve concerns raised during the May 16, 2007 public hearing. The MS4 Permittees remain committed to the management of urban runoff to protect receiving water quality in a manner that balances that objective with the finite resources available to meet the universe of needs and expectations of the citizens of California within the Whitewater River Region and Coachella Valley. We look forward to discussing these concerns and approaches to continue collaboration on implementation of the CVSC Bacterial Indicators TMDL.

If you have any questions, please feel free to contact Jason Uhley at 951.955.1273 (e-mail: [juhley@co.riverside.ca.us](mailto:juhley@co.riverside.ca.us)) or Arlene Chun at 951.922.1330 (e-mail: [abchun@co.riverside.ca.us](mailto:abchun@co.riverside.ca.us)) of my staff.

Very truly yours,



STEPHEN E. STUMP, P.E.  
Chief of Regulatory Division

c: Jeanine Townsend, Acting Clerk to the Board (Via e-mail:  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov) and facsimile: (916) 341-5620  
Whitewater MS4 Permittees (sent via e-mail)

ABC:cw  
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