



RIVERSIDE COUNTY FLOOD CONTROL  
AND WATER CONSERVATION DISTRICT

May 28, 2010

Ms. Jeanine Townsend, Clerk of the Board  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Dear Ms. Townsend:

Re: Comment Letter – 2010 305(b)  
Integrated Report / Section 303(d) List  
Relative to Potential Application to  
Riverside County

The Riverside County Flood Control & Water Conservation District (District), on behalf of the County of Riverside and the incorporated cities of Beaumont, Calimesa, Canyon Lake, Corona, Hemet, Lake Elsinore, Menifee, Moreno Valley, Murrieta, Norco, Perris, Riverside, San Jacinto and Wildomar (Permittees) appreciate the opportunity to comment on the 2010 305(b) Integrated Report / Section 303(d) list relative to potential application to Riverside County. The District has reviewed the comments submitted by Tim Moore of Risk Sciences on the 2010 Section 305(b) Integrated Report / Section 303(d) List dated May 28<sup>1</sup> and May 28<sup>2</sup> and are wholly supportive of, and reiterate his comments and recommendations regarding the listing of the Santa Ana River Reach 3 for cadmium and lead and Temescal Creek Reach 6 for bacteria.

As noted by Mr. Moore regarding the listing of the Santa Ana River Reach 3 for cadmium and lead, the Santa Ana Regional Water Quality Control Board's (Santa Ana Regional Board) determination that the Santa Ana River and its tributaries should not be listed for certain trace metals is based on years of research, thousands of pages of scientific documentation and an intimate understanding of water quality in the Santa Ana River. Before over-ruling the Santa Ana Regional Board's recommendations, the State Board should review the detailed administrative records associated with the 1994 Basin Plan amendment (including the hearing transcripts) and the numerous NPDES permits issued since then. These documents clearly demonstrate that the Santa Ana Regional Board staff used an approved metals translator to conduct their recent water quality assessment.<sup>3</sup>

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<sup>1</sup> Letter to Jeanine Townsend, State Water Resources Control Board, 2010 Integrated Report / Section 303(d) List, Tim Moore, President, Risk Sciences, Inc., May 28, 2010, as it pertains to the proposed listing of the Santa Ana River Reach 3 for cadmium and lead.

<sup>2</sup> Letter to Jeanine Townsend, State Water Resources Control Board, 2010 Integrated Report / Section 303(d) List, Tim Moore, President, Risk Sciences, Inc., May 28, 2010, as it pertains to the proposed listing of Temescal Creek Reach 6.

<sup>3</sup> The aforementioned documents and transcripts have been previously submitted and are already in the State Board's possession. Thus, the same documents and transcripts are included in this comment letter by reference rather than by resubmission.

Ms. Jeanine Townsend, Clerk of the Board  
Re: Comment Letter – 2010 Integrated  
Report / Section 303(d) List Relative to  
Potential Application to Riverside County

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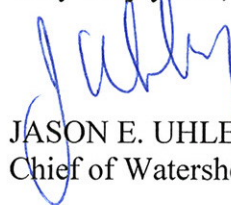
May 27, 2010

Similarly, the Permittees also support Mr. Moore's comments regarding the inappropriate listing of Temescal Creek Reach 6 for *E. coli*. As noted in Mr. Moore's letter, the proposed listing, at a minimum, violates the State Board's Listing Policy. Mr. Moore also raises several other substantive reasons for the inappropriateness of the proposed listing by State Board staff.

The Permittees request that the State Water Resources Control Board reject the State Board staff's recommendation to list Santa Ana River Reach 3 for cadmium and lead and Temescal Creek Reach 6 for bacteria.

Thank you for the opportunity to comment on the 2010 Section 305(b) Integrated Report / Section 303(d) List. We appreciate your consideration of our comments and look forward to the opportunity to continue to work with the Santa Ana Regional Board to develop site-specific criteria for managing water resources within Riverside County. If you have questions regarding these comments, please contact Arlene Chun ([abchun@rcflood.org](mailto:abchun@rcflood.org), 951.955.1330) or Claudio Padres ([cmpadres@rcflood.org](mailto:cmpadres@rcflood.org), 951.955.8602) of my staff.

Very truly yours,



JASON E. UHLEY, P.E.  
Chief of Watershed Protection Division

ec: Santa Ana Region Permittees

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