

# SURFSIDE HOMEOWNERS ASSOCIATION

To: Kathy Hamel

From: Bill Neal, Water/Field Superintendent

CC: Barbara Robinson, Surfside Homeowners Association General Manager, Kyle Langan, Aqua Technex, LLC

Date: 20 October 2010

Subject: **Aquatic Permit Comments**

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Ms. Hamel,

We are supportive of the permit program. Aquatic herbicides allow the management of our water bodies for the enjoyment of our members. We appreciate a system to allow the use of aquatic herbicides where such use is not harmful to other plants and animals. We have the following comments we would like to make for the record.

- Please consider the onerous impact of new requirements for the discharge permit. As I reviewed the document I noticed many things that will require much more time effort and cost to citizens who will be preparing plans such as the need for a bathymetry map. I understand that in some rare instances there may be a real need for such a map to determine the appropriateness of the plan. In most cases a simple statement of the general depths and conditions of the water body will provide sufficient information to make reasonable decisions. Please do not require onerous provisions on all applicants to satisfy the needs of the most complicated plans.
- It is our understanding that as long as the submitted plan meets the criteria listed the Department's documentation there should be no need to apply for re-submittal.
- Diquat is a very useful tool used to control noxious aquatic weeds. There is **no reason that its use should be subject to timing windows**. Timing windows will have a negative impact on its usefulness. There is no compelling research or studies that indicate a benefit to fish by imposing these restrictions.
- I was surprised to notice several products from the United States Environmental Protection Agency list of approved products were missing from the New Permit. In particular, **Chelated Cooper algacides and Galleon Herbicide** are missing. These products are necessary for the control of toxic algae blooms and hydrilla at a minimum. **These items need to be added to the permit**.
- There needs to be a streamlined way to add products that receive registration after the permit is issued.
- Please consider adding Phoslock as a nutrient inactivation tool.

Respectfully yours

Bill Neal

Water/Field Superintendent