



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA



Office of the General Manager

January 26, 2016

SUBMITTED VIA E-MAIL

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

Dear Ms: Townsend:

Comment Letter –Aquatic Animal Invasive Species Control Permit Reissuance

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to comment on the State Water Resources Control Board's (State Water Board's) draft Aquatic Animal Invasive Control Permit (draft 2016 Permit; Order WQ 2016-XXXX-DWQ) dated December 9, 2015. The reissued Permit serves as a general NPDES permit for point source discharges of biological pesticides and residual chemical pesticides from direct applications for aquatic animal invasive species control (i.e., zebra and quagga mussels). As an enrollee under the 2011 Aquatic Animal Invasive Control Permit (2011 Permit; Order WQ 2011-0002-DWQ), Metropolitan has a keen interest in the continued development of this permit. Previously, Metropolitan provided comments to the State Water Board in 2010 on the development of the original 2011 Permit. Metropolitan supports the changes in the draft 2016 Permit and has provided additional comments below in support of those changes.

Background

Metropolitan is a regional wholesaler that delivers water to 26 member public agencies, which in turn provides water to more than 19 million people in Los Angeles, Orange, Riverside, San Bernardino, San Diego and Ventura counties. To supply the more than 300 cities and unincorporated areas in Southern California with reliable and safe water, Metropolitan owns and operates an extensive water system including: the Colorado River Aqueduct, 16 hydroelectric facilities, nine reservoirs, 819 miles of large-scale pipes and five water treatment plants. In 2008, Metropolitan selected sodium hypochlorite as the preferred alternative for controlling the spread of quagga mussels within its raw water conveyance system. In accordance with its Quagga Mussel Control Program, Metropolitan applies chlorine at select locations within its raw water conveyance systems. Metropolitan enrolled under the current Aquatic Animal Invasive Control Permit in 2014 for sodium hypochlorite applications for quagga mussel control at

Metropolitan's service connection (CB-48), serving the Upper San Gabriel Municipal Water District in Northeastern Los Angeles County.

Comments

Metropolitan supports the changes found in the draft 2016 Permit. Specifically, Metropolitan finds the following items beneficial to the regulated community:

- Adding copper as an active ingredient for aquatic invasive species control (Section II. A.). Although Metropolitan does not currently use copper for quagga mussel control, Metropolitan supports the flexibility in the permit to do so in the future. In addition, Metropolitan uses copper as part of its active reservoir management program to treat, when necessary, algal blooms in its source water reservoirs, aqueducts, and canals. So Metropolitan has many years' worth of operational experience using copper within its system for nuisance organism control.
- Delegation of authority to the Executive Director (Section III.P). The draft 2016 Permit allows the Executive Director or his/her designee, to:
 - Add active ingredients that are registered by the California Department of Pesticide Regulation for the control of aquatic animal invasive species and corresponding receiving water limitations; and
 - Grant a regulatory exception to qualified dischargers from complying with pollutant receiving water limitations pursuant to the California Ocean Plan and/or the Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California.
 - This provision is similar to that found in the Aquatic Weed Control Permit (2014-0078-DWQ) and is beneficial to Metropolitan and other stakeholders in that it allows the State Water Board to expedite permit changes as new pesticides are approved. This provision also allows the pesticide users to be able to apply these approved pesticides without the need for a lengthy reopening of the permit
- No changes to the receiving water limitations for chlorine (Section VI.I.), Aquatic Pesticide Application Plan (Section VII.C.), monitoring and reporting requirements for chlorine (Section VIII.B.), and Notice of Intent (NOI) process (Attachment E.). By not modifying these sections, Metropolitan can continue to use its current compliance strategy under the new Permit.

Conclusion

Metropolitan thanks the State Water Board for the opportunity to comment on the draft Aquatic Animal Invasive Control Permit dated December 9, 2015 and supports the changes identified above. The changes found in the draft 2016 Permit will allow more operational flexibility to Metropolitan and other water agencies in dealing with longstanding and complex problems associated with managing aquatic invasive species in California.

Ms. Jeanine Townsend

Page 3

January 26, 2016

If you have any questions in this matter, please feel free to contact either Janet Bell (213-217-5516) or myself (213-217-5646).

Regards,

A handwritten signature in black ink, appearing to read "Bart Koch". The signature is written in a cursive, flowing style.

Bart Koch
Section Manager, Safety and Environmental Services

cc: Ariana.Villanueva@waterboards.ca.gov

JB:reg

(W:\WPShared\BK_Correspondence\AquaticAnimalInvasive.doc)