



Association of California Water Agencies

Leadership Advocacy Information Since 1910



Sent via ELECTRONIC MAIL to commentletters@waterboards.ca.gov

January 26, 2016

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

Re: Association of California Water Agencies' Comments Regarding the Aquatic Animals Invasive Species Control Permit Reissuance

Dear Ms. Townsend:

The Association of California Water Agencies ("ACWA") appreciates having the opportunity to comment on the State Water Resources Control Board's ("Water Board's") Draft Aquatic Animals Invasive Species Control Permit (NPDES No. CAG 990006, Order 2016-XXXX-DWQ), dated December 9, 2015 ("Draft Permit"). The Draft Permit serves as a general NPDES permit for point source discharges of pesticides associated with aquatic animal invasive species control. ACWA's nearly 430 public water agencies collectively supply approximately 90% of the water delivered for domestic, agricultural and industrial uses in California. Any of a number of ACWA member agencies may need to apply for coverage under this permit at various times, depending on their need to manage invasive aquatic animal species.

ACWA supports several of the changes in the Draft Permit, including the addition of copper to the list of covered chemicals. This addition will allow agencies the flexibility to apply for coverage in the instance that they need to control quagga mussels. In addition, ACWA supports the new provision that gives flexibility to the Water Board's Executive Director to add additional pesticides, without a complete reopening of the permit, and appreciates the fact that this provision is consistent with language in the Aquatic Weed Control Permit (NPDES No. CAG 990005, Order 2013-0002-DWQ).

If you have any questions regarding these comments, please do not hesitate to contact me at rebeccaf@acwa.com, or (916) 441-4545.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rebecca Franklin', written in a cursive style.

Rebecca Franklin
Regulatory Advocate

