RECEIVED
JUN 17 2013
DIVISION OF WATER QUALITY

Attachment E – Notice of Intent

WATER QUALITY ORDER NO. 2013-0002-DWQ
GENERAL PERMIT NO. CAG990005

STATEWIDE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR RESIDUAL AQUATIC PESTICIDE DISCHARGES TO WATERS OF THE UNITED STATES FROM ALGAE AND AQUATIC WEED CONTROL APPLICATIONS

I. NOTICE OF INTENT STATUS (see Instructions)

Mark only one item (A.) New Applicator B. Change of Information: WDID# 4 A9AP00001

C. ☐ Change of ownership or responsibility: WDID#

II. DISCHARGER INFORMATION

A. Name: Los Angeles Department of Water and Power (LADWP)			
B. Mailing Address: 111 North Hope Street, Room 1213			
C. City: Los Angeles	D. County: Los Angeles	E. State: CA	F. Zip: 90012
G. Contact Person: Katherine Rubin	H. E-mail address: Katherine.Rubin@ladwp.com	I. Title: Manager, Waste-Water Quality & Compliance	J. Phone: 213-367-0436

III. BILLING ADDRESS (Enter Information *only* if different from Section II above)

A. Name			
B. Mailing Address			
C. City	D. County	E. State	F. Zip
G. E-mail address	H. Title	I. Phone	

IV. RECEIVING WATER INFORMATION

A. Algaecide and aquatic herbicides are used to treat (check all that apply):

1. ☒ Canals, ditches, or other constructed conveyance facilities owned and controlled by Discharger.
   Name of the conveyance system: Van Norman Complex; Lower Franklin Reservoir Facility;
2. ☐ Canals, ditches, or other constructed conveyance facilities owned and controlled by an entity other than the Discharger. Barren Ridge Renewable Transmission Project; Castaic Creek
   Owner's name: _____
   Name of the conveyance system: _____
3. Directly to river, lake, creek, stream, bay, ocean, etc.
   Name of water body: _____

B. Regional Water Quality Control Board(s) where treatment areas are located
(REGION 1, 2, 3, 4, 5, 6, 7, 8, or 9): Region 4
(List all regions where algaecide and aquatic herbicide application is proposed.)

V. ALGAECIDE AND AQUATIC HERBICIDE APPLICATION INFORMATION

A. Target Organisms: Invasive, noxious & other weeds & species including but not limited to Arundo, bulrush/cattails, castor bean, Acacia, smartweed, European watermilfoil

B. Algaecide and Aquatic Herbicide Used: List Name and Active ingredients
Roundup and Roundup Custom (glyphosate)
Garlon (triclopyr)

C. Period of Application: Start Date August 2014 End Date Applications will be made on as-needed basis during year

D. Types of Adjuvants Used: NA

VI. AQUATIC PESTICIDE APPLICATION PLAN

Has an Aquatic Pesticide Application Plan been prepared and is the applicator familiar with its contents?
☒ Yes ☐ No

If not, when will it be prepared? _____

VII. NOTIFICATION

Have potentially affected public and governmental agencies been notified? ☒ Yes ☐ No

VIII. FEE

Have you included payment of the filing fee (for first-time enrollees only) with this submittal?
☒ YES ☐ NO ☐ NA

IX. CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment. Additionally, I certify that the provisions of the General Permit, including developing and implementing a monitoring program, will be complied with."

A. **Printed Name:** Katherine Rubin

B. **Signature:** Katherine Rubin **Date:** 5/22/14

C. **Title:** Manager, Wastewater Quality and Compliance Group

XI. FOR STATE WATER BOARD STAFF USE ONLY

WDID:	**Date NOI Received:**	**Date NOI Processed:**
Case Handler's Initial:	**Fee Amount Received:** $	**Check #:**
☐ **Lyris List Notification of Posting of APAP**	**Date** _____	**Confirmation Sent** _____

RECEIVED:

BY:

APPROVED FOR PAYMENT 5/22/14

Jennifer Pinkerton 7-4230

Katherine Rubin 7-0436

Work Order No: AGT34

Attachment 1

Aquatic Pesticides Application Plan (APAP)

The Los Angeles Department of Water and Power

Aquatic Pesticides Application Plan
For Aquatic Herbicides Only

WATER QUALITY ORDER NO. 2013-0002-DWQ

Statewide General National Discharge Pollutant Discharge Elimination System Permit for the Discharge of Aquatic Pesticides for Aquatic Weed Control in Waters of the United States

June 9, 2014

The Los Angeles Department of Water and Power
Environment and Efficiency
Wastewater Quality & Compliance
Group
111 N. Hope St.,
Room 1213
Los Angeles, California 90012

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I. INTRODUCTION AND LOCATIONS

The Los Angeles Department of Water and Power (LADWP) has applied for a statewide general National Pollutant Discharge Elimination System (NPDES) Permit from the State Water Resources Control Board (SWRCB) to continue application of aquatic herbicides (glyphosate- and triclopyr-based products) to control weeds and invasive species at the LADWP facilities listed in Table 1.

TABLE 1. LADWP Aquatic Weed Control Programs

Facility/Site	Region (RWQCB)	City & County	Problem Biota	Associated Problems	Aquatic Herbicide (active ingredient)
Van Norman Complex	4	Granada Hills / Los Angeles	Invasive plant species (Arundo, Salt Cedar, Castor Bean, Tree Tobacco; other invasive species with potential to occur: perennial pepper-weed, fennel, eucalyptus, pampas grass, Brazilian peppertree, Mexican fan palm, Peruvian peppertree, stinkwort, tocalote, mustard)	To maintain debris basin functions(provide sediment collection and flood control) to the site and site structures; removal of invasive species; routine maintenance.	Roundup or Roundup Custom (glyphosate)
Lower Franklin Reservoir Facility	4	Los Angeles / Los Angeles	Arundo, bulrush/cattails, castor bean, acacia, smartweed	Uncontrolled growth of weeds/invasive species could impede water flow; could result in standing water that attracts mosquitos.	Roundup or Roundup Custom (glyphosate)
Barren Ridge Renewable Transmission Project (BRRTP)	4	Angeles National Forest / Los Angeles	Weeds, mustard species, flowering tocolote, reproductive parts of smilo grass, tree tobacco, blessed thistle, Eurasian watermilfoil	Required by Forest Service to aid in eradication of invasive, non-native plant species; for fire protection near planned transmission towers and switching station	Roundup or Roundup Custom (glyphosate) and Garlon (triclopyr)
Castaic Creek	4	Castaic / Los Angeles	Weeds	Required for routine facility maintenance	Roundup Custom (glyphosate).

II. PROJECT BACKGROUND

LADWP is the nation's largest municipal utility. It provides power and drinking water to approximately 4 million customers in the City of Los Angeles. LADWP owns and operates a complex water distribution system that includes the Los Angeles Aqueduct, reservoirs, canals, streams and the Owens River. The system of water conveyances begins in the north at Mono

Lake and terminates at the Los Angeles Filtration Plant in Sylmar. After treatment in Sylmar, drinking water is distributed through a system of pipelines and reservoirs to the end users. LADWP owns and operates its own generation, transmission and distribution systems.

Need for Pesticides (Herbicide) Applications

LADWP applies aquatic herbicides for these purposes: 1) to remove vegetation (primarily invasive species) that can impair the ability of debris basins to collect sediment and/or provide flood control protection; 2) to eliminate impediments to stormwater flow, thus avoiding standing water that could serve as breeding grounds for mosquitoes and/or encourage unwanted vegetation growth; and 3) for the removal of weeds/vegetation including invasive species as part of routine facility maintenance and operational control; weeds/vegetation can attract burrowing rodents that can undermine slopes/structures and can also attract snakes. Note that aquatic herbicides are not applied to drinking water.

Following is detailed information about each LADWP facility where aquatic herbicides will or may be utilized.

A. VAN NORMAN COMPLEX

1.Site Description

The Van Norman Complex (VNC) is located within the Granada Hills area of Los Angeles. It includes a Lower Detention Basin and other facilities, as well as two debris basins. The Upper Debris Basin (UDB) is approximately three (3) acres in size, while the Middle Debris Basin is 15 acres in size. The basins provide sediment collection and flood control to the adjacent facilities. The low-flow channels of the basins must periodically be cleaned of sediment and vegetation to maintain their functions and hydraulic capacity.

Prior to 1994, both basins were approaching their capacity but were functioning properly. However, following the 1994 Northridge Earthquake, the UDB and MDB were subjected to large sediment loads which filled them beyond their capacities. Beginning in 1997, both debris basins were cleared of debris and vegetation and a new channel was created to channel storm water through the center of the basins. The project was completed in 2000.

Maintenance of the UDB and MDB is permitted under California Department of Fish and Game (CDFG) Streambed Alteration Agreement (SAA) # 1600-2004-0288-R5 2010-2022 (CDFG 2010) and California Regional Water Quality Control board (RWQCB) Water Quality Certification (WQC) No. 12-128 (RWQCB 2012). Both the SAA and the WQC require the removal from the basins of arundo (Arundo donax), also referred to as giant reed, in addition to other invasive species after each sediment removal activity. Vegetation/invasive species removal is not conducted on a regular schedule; the amount of rain and sediment accumulation dictates when removal will occur.

Stormwater from Weldon Creek enters the Complex at the north end of the UDB and passes southward into the MDB. Grapevine Creek and Bee Canyon ultimately drain into the MDB. After sand and gravel settles out of the stormwater in the UDB and MDB, the stormwater ultimately flows into Bull Creek via a concrete channel at the southern end of the MDB. Bull Creek ultimately discharges to concrete lined portions of the Los Angeles River.

2. Treatment area

The treatment area consists of portions of the channel that direct storm water through the center of the basins. This runs roughly through the center of the north end of the facility, and along the southeastern portion of the facility. See Figure A. Red lines/shading indicate the treatment areas.

3. Aquatic Weeds and Rationale

Both the SAA and WQC require the removal from the basins, after each sediment removal activity, of arundo, also referred to as giant reed, in addition to other invasive species (including but not limited to, salt cedar, castor bean, tree tobacco, all of which have been observed on site). LADWP consulted with a firm whose biologists surveyed the site to identify invasive species. The firm produced an "Arundo and Invasive Species Removal Plan (Plan)" for the VNC (See Attachment 1). The Plan describes treatment options for each invasive species: the preferred treatment method, timing of treatment, and the most effective aquatic herbicide/active ingredient. It also provided treatment options for invasive species with a high potential for occurring on site, including but not limited to: perennial pepperweed, fennel, eucalyptus, pampas grass, and Brazilian peppertree.

The Plan excludes species that are from northern California or are found in mountains or rangelands, as these are not likely to occur at the site.

4. Aquatic Herbicides Applied and Method of Application

Aquatic Herbicide: Roundup or Roundup Custom ("Roundup"), which contains glyphosate.

Application method: The Roundup is stored in a stainless steel tank which is trailer-mounted or placed on a flat-bed and then transported to treatment areas. A hose from the tank is used to apply the pesticide; the tank remains secured on the trailer/flat-bed so that no spilling occurs. LADWP will apply pesticides only when there is a low chance of precipitation per the seven (7) day forecast and will endeavor to apply pesticides only the application/treatment areas are dry.

5. Decision to Select Herbicides

LADWP contracted with a consulting firm to produce an invasive species removal plan for the Van Norman complex. A team of biologists conducted a site survey to identify vegetation, whether native, non-native, and invasive. The team's report indicated that treatment options include a combination of manual removal and herbicide treatments. Mechanical removal was determined to be ineffective for the targeted vegetation because it does not remove the entire root systems and could even increase infestations of some species. An aquatic herbicide with glyphosate was identified as the most effective. Mechanical removal therefore can be used only for areas that do not include the targeted species and where the terrain is sufficiently flat. Manual removal is primarily intended for minor infestations of new arundo plants.

6. Herbicide Dose and Determination

Roundup is applied consistent with product labeling instructions for control of aquatic weeds.

7. Gates and Control structures

Not applicable.

8. Exception period.

Not applicable.

9.Monitoring Plan

See Appendix A

10. Procedures to Prevent Sample Contamination from Persons, Equipment, and Vehicles Associated with Algaecide and Aquatic Herbicide Application

Water quality sampling is conducted by trained LADWP staff following established procedures designed to prevent contamination of samples. Procedures that prevent sample contamination include:

- Use clean sample bottles that are non-reactive. Glass and polyethylene bottles are used for water samples.
- Wear gloves that are powder-free vinyl to avoid the contamination associated with latex gloves.
- Samples are immediately placed in an ice chest away from contaminants as soon as the samples are taken.

11. Best Management Practices Implemented

The herbicide is applied by LADWP personnel who have either a Qualified Applicator

Certificate or License issued by the State of California Department of Pesticide Regulation (Licensing Certification Program). These individuals are trained to ensure that algaecides and aquatic herbicides are applied at rates consistent with label requirements and in a manner that avoids potential adverse effects.

Notification: Not applicable.

Treatment: Correctly mixed aquatic herbicides are applied during daylight hours by certified personnel using properly-maintained and calibrated equipment capable of delivering desired volumes. Whenever feasible, localized applications are utilized (e.g., direct painting of herbicide on cut stumps), rather than foliar applications, to limit the possibility for drift and impacts to neighboring native species. However, for plants that are less than 4 feet tall, foliar application is less labor intensive and more effective. It is easier to minimize overspray or drift when treating smaller plants. Drift management requirements are also followed through techniques such as controlling droplet size, nozzle orientation, and avoiding spray applications when wind speed exceeds 10 miles per hour. The team of biologists specifically recommended cutting of arundo to a height of 6 inches or less and "painting" the remaining stumps with the herbicide with a cloth-covered wand or sponge, or by spraying with a hand mister. Manual removal is primarily intended for minor infestation of new arundo plants. Because plant rhizome materials may remain, manual removal is generally not recommended.

Spill Prevention and Cleanup: The Roundup Custom is stored in a stainless steel tank which is trailer-mounted or placed on a flat-bed and then transported to treatment areas. A hose from the tank is used to apply the pesticide; the tank remains secured on the trailer/flat bed so that no spilling occurs. Spray nozzles are attached to the hose that runs from the tank. Spray nozzles cannot dispense the herbicide unless the nozzle is activated (squeezed/triggered) by treatment personnel. When crews utilize backpack-style tanks, hose and nozzle connections and all caps/lids are inspected for tight/complete connections and closure prior to use to prevent leaks and spills.

However, should a spill occur, staff will follow the field division's established emergency response procedures and refer to the material safety data sheet (MSDS) for instructions on containing and cleaning up the spill. Emergency response and MSDS procedures will be reviewed regularly. A copy of the emergency response procedures and material safety data sheets will be available during each treatment. Cleanup equipment will be kept in good working order and will be readily available at each application site.

Water Quality Monitoring: Should the application/treatment areas contain water at the time of application, water quality monitoring will follow in accordance with permit requirements; see Appendix A.

Access: The entire Van Norman Complex has locked access gates that prevent entry by other than authorized personnel. Public access is not allowed.

Post-Treatment: The efficacy of the treatment is evaluated at the conclusion of the growing season during which treatment took place, and again at the commencement of the new growing season.

12. Possible Alternatives to Algaecides and Aquatic Herbicide Use

a. Evaluation of Management Options

(1) No Action

Typically, a "no action" approach is utilized until a certain threshold is reached, whereby excessive weed and plant growth begin to block channels and prevent stormwater from exiting the site. When stormwater cannot leave the site, the debris basins and channel would become congested with vegetation and their ability to collect sediment and/or provide flood control protections would be impaired. A "no action" option is therefore not acceptable after the threshold has been reached.

(2) Prevention

Nutrient Control. For this site, the vegetation already exists and must be eradicated. It is hoped that the eradication program may prevent the regrowth of vegetation, but this cannot be determined until the beginning of the next new growth season.

(3) Mechanical or Physical Methods

Mechanical removal was determined to be ineffective for the targeted vegetation because it does not remove the entire root systems and could even increase infestations of some species. An aquatic herbicide with glyphosate was identified as the most effective. Mechanical removal therefore can be used only for areas that do not include the targeted species and where the terrain is sufficiently flat. It is also infeasible for the majority of the site due to the following: lack of access for heavy equipment, uneven terrain, areas that are too wet or rocky for equipment or too dangerous for personnel to carry the tools required for mechanical removal.

(4) Cultural Method

Methods such as controlled burning are not suitable for aquatic vegetation or this specific site.

(5) Biological Control Agents

Biological methods such as the introduction of ducks or other wildlife are not suitable for a drinking water facility, as there may be impacts to water quality from animal feces, increases in turbidity levels and nutrients, as well as impacts to other existing, desirable species.

(6) Algaecides and Aquatic Herbicides

Aquatic Herbicide Treatment. Glyphosate has been proven to be an environmentally safe herbicide that is effective at reducing targeted aquatic weeds without adverse effects on non-target species. If the Van Norman Complex were not treated, aquatic weeds would negatively impact the ability of the on-site debris basins to collect sediment and stormwater and prevent flooding..

b. Decision Matrix to Select the Most Appropriate Formulation

The decision matrix below evaluates the aquatic weed options identified for the Van Norman Complex (section a: "Evaluation of Management Options" above).

Van Norman Complex						
Decision Making Criteria	**No Action**	**Prevention**	**Mechanical or Physical**	**Cultural Methods**	**Biological Agents**	**Aquatic Herbicides**
Is the impact to the environment low or easily mitigated?	Yes	Yes	Yes	Yes	Yes	Yes
Is the cost of this option reasonable?	N/A	No	No	No	No	Yes
Has (have) the method(s) been effectively implemented at this site?	No	No	Yes	No	No	Yes
Option(s) selected for Van Norman Complex						X

B. LOWER FRANKLIN RESERVOIR FACILITY

1.Site Description

The Lower Franklin Reservoir Facility includes a surge tank, power house, chlorination station, and a stormwater channel. The 168-acre site is situated in a canyon in the Santa Monica Mountains National Recreation Area, adjacent to the City of Beverly Hills. This Facility has been in service since 1982.

Stormwater enters the facility from all directions, as the facility is lower than (below) all adjacent properties, but in general, the overall site slopes from north to the south and any stormwater in the stormwater channel roughly follows this same path.

The area below the reservoir has a low point that has formed a natural channel that runs generally north to south. Trees and shrubs were observed on the sides of the channel. Invasive species (arundo and cattails) were observed in the bottom of the stormwater channel. The invasive species must be removed as they are impediments to the flow of stormwater through the channel and into a storm drain located at the southwest corner of the site. This storm drain eventually connects to the Ballona Creek.

There are concrete gutters at the toe of some site hillsides, adjacent to the roadway.

2. Treatment area

The treatment area consists of the middle section of the natural channel. See figure B. Red lines indicate the treatment area.

3. Aquatic Weeds and Rationale

Vegetation must be removed so that stormwater can flow unimpeded through the site. The targeted vegetation includes invasive species such as arundo and bulrush/cattails.

4. Aquatic Herbicides Applied and Method of Application

Roundup or Roundup Custom ("Roundup") for Aquatic and Terrestrial Use. This product contains glyphosate.

Application method: The Roundup is stored in tanks that are transported to the site via a pickup truck. The truck is also equipped with a mounted or spray rig. In the channel bottom, a backpack style tank with a nozzle is used by crew member who is certified to apply pesticides/herbicides. The flow and rate of the herbicide can be controlled via the nozzle. Along the roadway, herbicides can be applied from the truck-mounted rig.

LADWP will apply pesticides only when there is a low chance of precipitation per the seven (7) day forecast, and will endeavor to apply pesticides only the application/treatment areas are dry.

5. Decision to Select Herbicides

Most of the treatment area is not accessible to mowers or trucks; mechanical treatment is also infeasible to due to the site characteristics (uneven areas, small drop-offs, soft soil).

6. Herbicide Dose and Determination

Roundup is applied consistent with product labeling instructions for control of aquatic weeds.

7. Gates and Control structures

Not applicable.

8. Exception period.

Not applicable.

9. Monitoring Plan

See Appendix A

10. Procedures to Prevent Sample Contamination from Persons, Equipment, and Vehicles Associated with Algaecide and Aquatic Herbicide Application

Water quality sampling is conducted by trained LADWP staff following established procedures designed to prevent contamination of samples. Procedures that prevent sample contamination include:

- Use clean sample bottles that are non-reactive. Glass and polyethylene bottles are used for water samples.
- Wear gloves that are powder-free vinyl to avoid the contamination associated with latex gloves.
- Samples are immediately placed in an ice chest away from contaminants as soon as the samples are taken.

11. Best Management Practices Implemented

Application: The herbicide is applied by LADWP personnel who have either a Qualified Applicator Certificate or License issued by the State of California Department of Pesticide Regulation (Licensing Certification Program). These individuals are trained to ensure that algaecides and aquatic herbicides are applied at rates consistent with label requirements and in a manner that avoids potential adverse effects.

Notification: Not applicable

Treatment: Correctly mixed aquatic herbicides are applied during daylight hours by certified personnel using properly-maintained and calibrated equipment capable of delivering desired volumes. Whenever feasible, use should be limited to localized applications (e.g., direct painting of herbicide on cut stumps), rather than foliar applications, to limit the possibility for drift and impacts to neighboring native species. However, for plants that are less than 4 feet tall, foliar application is less labor intensive and more effective. Additionally, it is easier to minimize overspray or drift when treating smaller plants. Drift management requirements are also followed, such as controlling droplet size, nozzle orientation, and avoiding spray applications when wind speed exceeds 10 miles per hour. Treatment may entail first cutting the arundo to a height of 6 inches of less and the painting the remaining stumps with the herbicide. The stumps can be painted with a cloth-covered wand or sponge or spraying with a hand mister. Manual removal is primarily intended for minor infestation of new arundo plants. But because plant rhizome materials may remain, manual removal is generally not recommended.

Spill Prevention and Cleanup: The Roundup Custom is stored in a stainless steel tank which is trailer-mounted or placed on a flat-bed and then transported to treatment areas. A hose from the tank is used to apply the pesticide; the tank remains secured on the trailer/flat bed so that no spilling occurs. Spray nozzles are attached to the hose that runs from the tank. Spray nozzles cannot dispense herbicide unless the nozzle is activated (squeezed/triggered) by treatment personnel. When crews utilize backpack-style tanks, hose and nozzle connections and all caps/lids are inspected for tight/complete connections and closure prior to use to prevent leaks and spills.

However, should a spill occur, staff will follow the field division's established emergency response procedures and refer to the material safety data sheet (MSDS) for instructions on containing and cleaning up the spill. Emergency response and MSDS procedures will be reviewed regularly. A copy of the emergency response procedures and material safety data sheets will be available during each treatment. Cleanup equipment will be kept in good working order and will be readily available at each application site.

Water Quality Monitoring: Should the application/treatment areas contain water at the time of application, water quality monitoring will follow in accordance with permit requirements; see Appendix A.

Access: The entire Lower Franklin Reservoir Facility has locked access gates that prevent entry by other than authorized personnel. Public access is not allowed.

Post-Treatment: The efficacy of the treatment is evaluated at the conclusion of the growing season.

12. Possible Alternatives to Algaecides and Aquatic Herbicide Use

a. Evaluation of Management Options

(1) No Action

Typically, a "no action" approach is utilized until a threshold is reached, whereby excessive weed and plant growth begin to impede the flow of stormwater ; flooding could result. A "no action" option is therefore not acceptable after the threshold has been reached.

(2) Prevention

Nutrient Control. For this site, the vegetation already exists and must be eradicated. It is hoped that the eradication program may prevent the regrowth of vegetation, but this cannot be determined until the beginning of a new growth season.

(3) Mechanical or Physical Methods

Mechanical removal is physically infeasible due to the following: lack of access for heavy equipment, uneven terrain, areas that are too wet or rocky for equipment or too dangerous for personnel to carry the tools required for mechanical removal.

(4) Cultural Method

Methods such as controlled burning are not suitable for aquatic vegetation or this specific site.

(5) Biological Control Agents

Biological methods such as the introduction of ducks or other wildlife are not suitable for a drinking water facility, as there may be impacts to water quality from animal feces, increases in turbidity levels and nutrients, and impacts to other existing, desirable species.

(6) Algaecides and Aquatic Herbicides

Aquatic Herbicide Treatment. Glyphosate has been proven to be an environmentally safe herbicide that is effective at reducing targeted aquatic weeds without adverse effects on non-target species. If the Lower Franklin Reservoir Facility were not treated, aquatic weeds would impede the flow of stormwater through the site, which could lead to flooding.

b. Decision Matrix to Select the Most Appropriate Formulation

The decision matrix below evaluates the aquatic weed options identified for the Lower Franklin Reservoir Facility (section a: "Evaluation of Management Options" above).

Lower Franklin Reservoir Facility						
Decision Making Criteria	**No Action**	**Prevention**	**Mechanical or Physical**	**Cultural Methods**	**Biological Agents**	**Aquatic Herbicides**
Is the impact to the environment low or easily mitigated?	Yes	Yes	Yes	Yes	Yes	Yes
Is the cost of this option reasonable?	N/A	No	No	No	No	Yes
Has (have) the method(s) been effectively implemented at this site?	No	No	Yes	No	No	Yes
Option(s) selected for Lower Franklin Reservoir facility						X

C. BARREN RIDGE RENEWABLE TRANSMISSION PROJECT (BRRTP)

1. Site Description

LADWP is undertaking the Barren Ridge Renewable Transmission Project (BRRTP) to carry renewable energy. This electricity project entails construction of transmission lines, towers to support new transmission lines, and a switching station. This document pertains to the portion of the project that lies within the Angeles National Forest (ANF), which is under the jurisdiction of the National Forest Service (NSF).

The site is roughly bounded by the 138 Highway to the north and the northeast, California State Route 14 to the east and southeast, and the Interstate 5 to the west. There are ephemeral streambeds in the site, but none adjacent to identified treatment areas.

Weed control is required at individual locations that fall within three areas: a) along the 13-mile route of the new Barren Ridge-Haskell Canyon transmission line; b) along the13 mile-long existing Barren Ridge-Rinaldi Transmission Line; and along the four mile-long new circuit that will be constructed between Haskell Canyon and the Castaic Power Plant. Construction will take place within designated utility corridors.

2. Treatment area

Weed treatment is required per the BRRTP Final Environmental Impact Report/Final Environmental Impact Statement (FEIR/FEIS) (LADWP, Bureau of Land Management [BLM], and United States Forest Service [USFS] 2013), and U. S. Fish and Wildlife Service (USFWS) Biological Opinion (USFWS 2012). Treatment is intended to treat invasive plant populations that have a negative ecological impact and/or pose fire hazards.

Treatment will be limited to individual locations where transmission towers (for transmission lines) and a switching station will be constructed and where botanists have identified invasive weeds.

3. Aquatic Weeds and Rationale

Weed treatment is required per the BRRTP Final Environmental Impact Report/Final Environmental Impact Statement (FEIR/FEIS) (LADWP, Bureau of Land Management [BLM], and United States Forest Service [USFS] 2013), and U. S. Fish and Wildlife Service (USFWS) Biological Opinion (USFWS 2012). Treatment is intended to treat invasive plant populations that have a negative ecological impact and/or pose fire hazards.

This is a remote area with rocky, uneven terrain, accessible via dirt fire roads. The Forest Service requires hand removal (pulling) and/or cutting of most weed species. After hand removal, the immediate removal site is spot-treated with an herbicide.

4. Aquatic Herbicides Applied and Method of Application

Roundup or Roundup Custom ("Roundup"), which contains glyphosate, or Garlon, which contains triclopyr.

Application method: The selected herbicide is stored in tanks that are transported to the site via a pickup truck. The truck is also equipped with a mounted or spray rig. The truck can be used for treatment sites in close proximity to fire roads. For treatment sites that are beyond the range of the truck, a backpack style tank with a nozzle will be used by crew member who is certified to apply pesticides/herbicides. The flow and rate of the herbicide can be controlled via the nozzle.

LADWP will apply pesticides only when there is a low chance of precipitation per the seven (7) day forecast, and will endeavor to apply pesticides only the application/treatment areas are dry.

5. Decision to Select Herbicides

Treatment protocol is determined by the Forest Service, which mandates hand removal (pulling) and/or cutting of most weeds/invasive species, followed by spot treatment with an herbicide.

6. Herbicide Dose and Determination

Roundup or Garlon is applied consistent with product labeling instructions for control of aquatic weeds.

7. Gates and Control structures

Not applicable.

8. Exception period.

Not applicable.

9. Monitoring Plan

See Appendix A

10. Procedures to Prevent Sample Contamination from Persons, Equipment, and Vehicles Associated with Algaecide and Aquatic Herbicide Application

Water quality sampling is conducted by trained LADWP staff following established procedures designed to prevent contamination of samples. Procedures that prevent sample contamination include:

- Use clean sample bottles that are non-reactive. Glass and polyethylene bottles are used for water samples.
- Wear gloves that are powder-free vinyl to avoid the contamination associated with latex gloves.
- Samples are immediately placed in an ice chest away from contaminants as soon as the samples are taken.

11. Best Management Practices Implemented

Application: The herbicide is applied by LADWP personnel who have either a Qualified Applicator Certificate or License issued by the State of California Department of Pesticide Regulation (Licensing Certification Program). These individuals are trained to ensure that algaecides and aquatic herbicides are applied at rates consistent with label requirements and in a manner that avoids potential adverse effects.

Notification: The Forest Service has approved LADWP's Treatment Plan.

Treatment: Correctly mixed aquatic herbicides are applied – via spot treatment - during daylight hours by certified personnel using properly-maintained and calibrated equipment capable of delivering desired volumes. Drift management requirements are also followed, such as controlling droplet size, and nozzle orientation.

Spill Prevention and Cleanup: The Roundup or Garlon is stored in a stainless steel tank which is trailer-mounted or placed on a flat-bed and then transported to treatment areas. A hose from

the tank is used to apply the pesticide; the tank remains secured on the trailer/flat-bed so that no spilling occurs. Nozzles are attached to the hose that runs from the tank. Nozzles cannot dispense herbicide unless the nozzle is activated (squeezed/triggered) by treatment personnel. When crews utilize backpack-style tanks, hose and nozzle connections and all caps/lids are inspected for tight/complete connections and closure prior to use to prevent leaks and spills.

However, should a spill occur, staff will follow the field division's established emergency response procedures and refer to the material safety data sheet/s (MSDS) for instructions on containing and cleaning up the spill. Emergency response and MSDS procedures will be reviewed regularly. A copy of the emergency response procedures and material safety data sheets will be available during each treatment. Cleanup equipment will be kept in good working order and will be readily available at each application site.

Water Quality Monitoring: Should the application/treatment areas contain water at the time of application, water quality monitoring will follow in accordance with permit requirements; see Appendix A.

Access: The fire roads leading to the treatment areas have multiple locked gates that preclude access by other than authorized personnel.

Post-Treatment: The efficacy of the treatment is evaluated at the conclusion of the growing season.

12. Possible Alternatives to Algaecides and Aquatic Herbicide Use

a. Evaluation of Management Options

(1)No Action

Typically, a "no action" approach is utilized. At this site, weed treatment is required by the Forest Service to address invasive plant species and to minimize fire hazards. Because of existing weed infestation, the "no action" option is therefore not feasible.

(2) Prevention

Nutrient Control. For this site, the vegetation already exists and must be eradicated. It is hoped that the eradication program may prevent the regrowth of vegetation, but this cannot be determined until the beginning of a new growth season.

(3) Mechanical or Physical Methods

Mechanical removal is infeasible due to Forest Service requirements.

(4) Cultural Method

Methods such as controlled burning are not allowed within the ANF.

(5) Biological Control Agents
Biological methods are not allowed within the ANF.

(6) Algaecides and Aquatic Herbicides
Aquatic Herbicide Treatment. Glyphosate and triclopyr have been proven to be environmentally safe herbicides that are effective at reducing targeted weeds/species without adverse effects on non-target species.

b. **Decision Matrix to Select the Most Appropriate Formulation**
The decision matrix below evaluates the aquatic weed options identified for the BRRTP (section a: "Evaluation of Management Options" above).

Barren Ridge Renewable Transmission Project						
Decision Making Criteria	**No Action**	**Prevention**	**Mechanical or Physical**	**Cultural Methods**	**Biological Agents**	**Aquatic Herbicides**
Is the impact to the environment low or easily mitigated?	Yes	Yes	Yes	Yes	Yes	Yes
Is the cost of this option reasonable?	N/A	No	No	No	No	Yes
Has (have) the method(s) been effectively implemented at this site?	No	No	Yes	No	No	Yes
Option(s) selected for BRRTP						X

D. CASTAIC CREEK STORMWATER BYPASS CHANNEL/CHECK BASINS & EMERGENCY SPILLWAY

1.Site Description

The Castaic Creek Stormwater Bypass Channel is adjacent to the hydroelectric Castaic Power Plant in northern Los Angeles County, within the Los Padres National Forest. The Channel includes three debris basins, each with its own "check dams." In addition, also located at the Castaic Power Plant is an Emergency Spillway.

2.Treatment Areas

Should it be necessary, the Emergency Spillway allows for the overflow of water from the Elderberry Forebay, immediately adjacent to the Power Plant, into Castaic Lake. An herbicide is occasionally applied, as spot treatment, as vegetation can undermine the Emergency Spillway and attract burrowing rodents. The debris basins provide sediment collection and flood control. Herbicides are applied as needed inside the basins and on their check dams to treat vegetation that could impede stormwater flow and impair flood prevention functions.

3. Aquatic Weeds and Rationale

Mechanical and hand removal are employed when feasible but typically the amount of vegetation in the debris basin determines the need for treatment with herbicides. An aquatic herbicide with glyphosate is used to treat vegetation because of its proven effectiveness.

4. Aquatic Herbicides Applied and Method of Application

Roundup or Roundup Custom ("Roundup"), which contains glyphosate.

Application method: Roundup is stored in a stainless steel tank which is trailer-mounted or placed on a flat-bed truck and then transported to treatment areas. A hose from the tank is used to apply the pesticide; the tank remains secured on the trailer/flat-bed so that no spilling occurs. When the truck cannot be used due to steep embankments or distance from the trailer/flat-bed, crews will utilize backpack-style tanks.

5. Decision to Select Herbicides

Mechanical and hand removal are employed whenever feasible, but the steep Emergency Spillway embankment and a large amount of vegetation inside the debris basin often necessitate herbicide treatment. An aquatic herbicide with glyphosate was identified as the most effective eradication method.

6. Herbicide Dose and Determination

Roundup is applied consistent with product labeling instructions for control of aquatic weeds.

7. Gates and Control structures

Not applicable.

8. Exception period.

Not applicable.

9.Monitoring Plan

See Appendix A

10. Procedures to Prevent Sample Contamination from Persons, Equipment, and Vehicles Associated with Algaecide and Aquatic Herbicide Application

Water quality sampling is conducted by trained LADWP staff following established procedures designed to prevent contamination of samples. Procedures that prevent sample contamination include:

- Use clean sample bottles that are non-reactive. Glass and polyethylene bottles are used for water samples.

- Wear gloves that are powder-free vinyl to avoid the contamination associated with latex gloves.
- Samples are immediately placed in an ice chest away from contaminants as soon as the samples are taken.

11. Best Management Practices Implemented

Application: The herbicide is applied by LADWP personnel who have either a Qualified Applicator Certificate or License issued by the State of California Department of Pesticide Regulation (Licensing Certification Program). These individuals are trained to ensure that algaecides and aquatic herbicides are applied at rates consistent with label requirements and in a manner that avoids potential adverse effects.

Notification: Not applicable.

Treatment: Correctly mixed aquatic herbicides are applied during daylight hours by certified personnel using properly-maintained and calibrated equipment capable of delivering desired volumes. Whenever feasible, localized spot applications are utilized rather than foliar applications, to limit the possibility for drift and impacts to neighboring native species. Drift management requirements are also followed through techniques such as controlling droplet size, nozzle orientation, and avoiding spray applications when wind speed exceeds 10 miles per hour.

Spill Prevention and Cleanup: The Roundup is stored in a stainless steel tank which is trailer-mounted or placed on a flat-bed and then transported to treatment areas. A hose from the tank is used to apply the pesticide; the tank remains secured on the trailer/flat-bed so that no spilling occurs. Spray nozzles are attached to the hose that runs from the tank. Spray nozzles cannot dispense herbicide unless the nozzle is activated (squeezed/triggered) by treatment personnel. When crews utilize backpack-style tanks, hose and nozzle connections and all caps/lids are inspected for tight/complete connections and closure prior to use to prevent leaks and spills.

However, should a spill occur, staff will follow the field division's established emergency response procedures and refer to the material safety data sheet (MSDS) for instructions on containing and cleaning up the spill. Emergency response and MSDS procedures will be reviewed regularly. A copy of the emergency response procedures and material safety data sheets will be available during each treatment. Cleanup equipment will be kept in good working order and will be readily available at each application site.

Water Quality Monitoring: Should the application/treatment areas contain water at the time of application, water quality monitoring will follow in accordance with permit requirements; see Appendix A.

LADWP will apply pesticides only when there is a low chance of precipitation per the seven (7) day forecast, and will endeavor to apply pesticides only the application/treatment areas are dry.
Access: The entire Castaic site is fenced; the entryway has security personnel, and all gates into the site are locked.

Post-Treatment: The efficacy of the treatment is evaluated at the conclusion of the growing season during which treatment took place, and again at the commencement of the new growing season.

12. Possible Alternatives to Algaecides and Aquatic Herbicide Use

a. Evaluation of Management Options

(1)No Action

A "no action" is infeasible, as the Emergency Spillway embankments and debris basin must be kept free of weeds for general maintenance purposes, to ensure integrity and to maintain flood control protection.

(2) Prevention

Nutrient Control. For this site, the vegetation already exists and must be eradicated. It is hoped that the eradication program may prevent the regrowth of vegetation, but this cannot be determined until the beginning of the next new growth season.

(3)Mechanical or Physical Methods

Mechanical and hand removal are employed whenever feasible but steep embankments and the amount of vegetation inside the debris basin often necessitate the use of an herbicide. Use of an aquatic herbicide with glyphosate was identified as the most effective method.

(4)Cultural Method

Methods such as controlled burning are not suitable for this specific site.

(5)Biological Control Agents

Biological methods are not suitable for this site; ducks and other wildlife are already present and have no impact on weed growth.

(6)Algaecides and Aquatic Herbicides

Aquatic Herbicide Treatment. Glyphosate has been proven to be an environmentally safe herbicide that is effective at reducing targeted aquatic weeds without adverse effects on non-target species.

b. Decision Matrix to Select the Most Appropriate Formulation

The decision matrix below evaluates the aquatic weed options identified for Castaic (section a: "Evaluation of Management Options" above).

Castaic Creek						
Decision Making Criteria	**No Action**	**Prevention**	**Mechanical or Physical**	**Cultural Methods**	**Biological Agents**	**Aquatic Herbicides**
Is the impact to the environment low or easily mitigated?	Yes	Yes	Yes	Yes	Yes	Yes
Is the cost of this option reasonable?	N/A	No	No	No	No	Yes
Has (have) the method(s) been effectively implemented at this site?	No	No	Yes	No	No	Yes
Option(s) selected for Castaic Creek						X

I. Figures

Figure A.
Map of Van Norman Complex
Showing Location of
Application/Treatment Areas

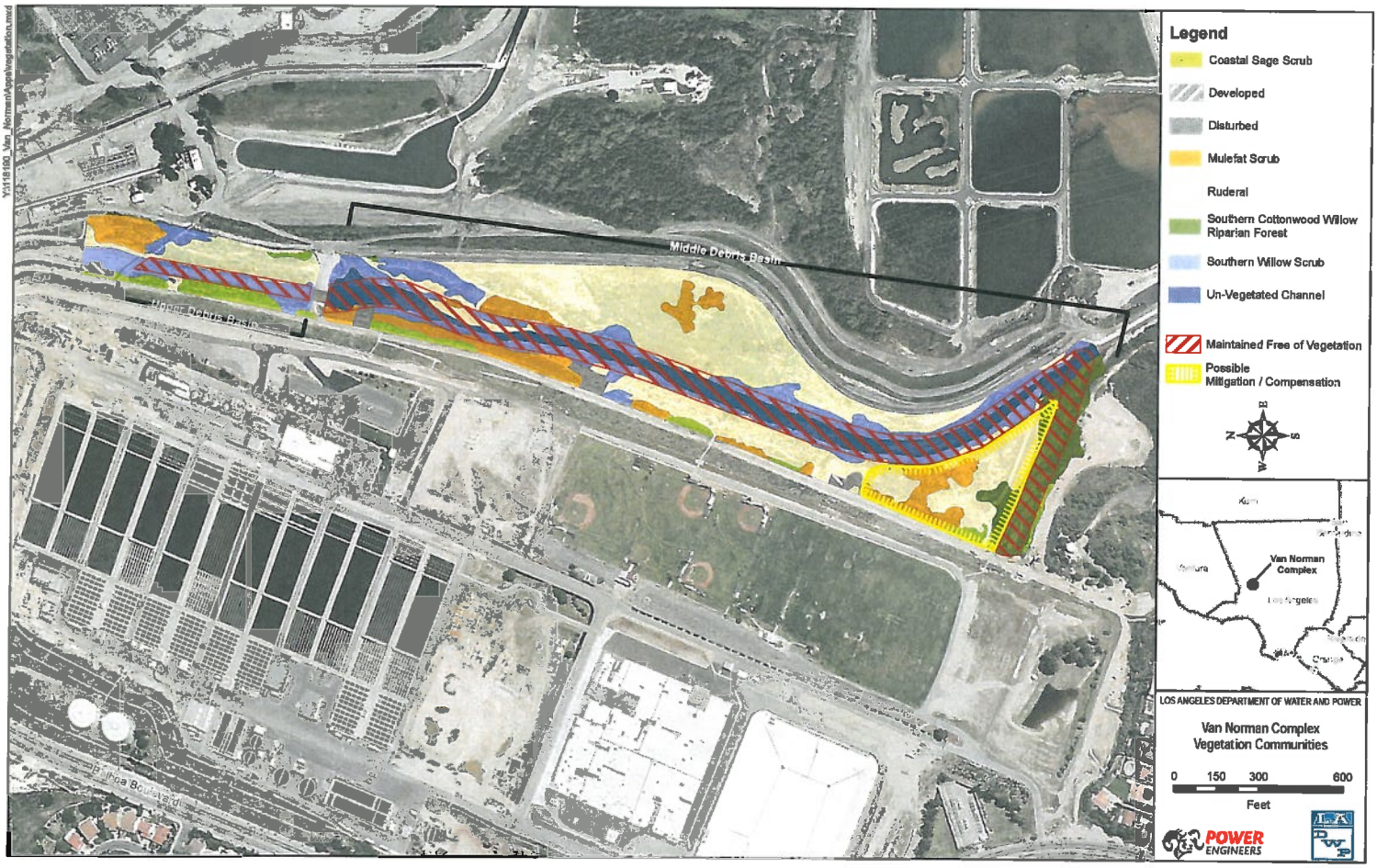
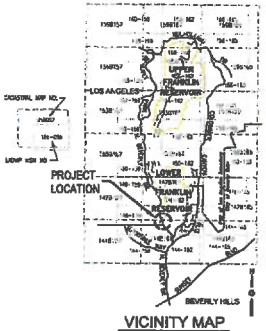

Middle Debris Basin
Legend
Coastal Sage Scrub
Developed
Disturbed
Mulefat Scrub
Ruderal
Southern Cottonwood Willow Riparian Forest
Southern Willow Scrub
Un-Vegetated Channel
Maintained Free of Vegetation
Possible Mitigation / Compensation
N
E
S
W
Van Norman Complex
LOS ANGELES DEPARTMENT OF WATER AND POWER
Van Norman Complex
Vegetation Communities
0 150 300 600
Feet
POWER ENGINEERS

Figure B.

Map of Lower Franklin Reservoir Facility
Showing Location of

Application/Treatment Areas



VICINITY MAP
NOT TO SCALE

LEGEND

RELEASE DATE: OCT. 2, 2013

LOWER FRANKLIN RESERVOIR PROPERTY
AERIAL EXHIBIT

1300 N. BEVERLY DRIVE, LOS ANGELES, CA 90210
N/o COLDWATER CANYON DR. AND N. BEVERLY DR.

R/W No. 13448
W.O. WAR22
WATER SERVICE MAP Nos 150-159, 150-162, 148-159, 148-162, 148-159, AND 148-162
CADASTRAL MAP Nos. 1508157, 1508161, 1478157, 1478161, AND 1448161
THOMAS BROS MAP Nos. 592-E4 TO E5

DEPARTMENT OF WATER AND POWER
WATER ENGINEERING & TECHNICAL SERVICES CITY OF LOS ANGELES
RW13448-AE-3

Los Angeles Department of Water and Power
SURVEYS & RIGHT-OF-WAY ENGINEERING GROUP
CITY OF LOS ANGELES DEPARTMENT OF WATER & POWER
LOWER FRANKLIN RESERVOIR

Figure C.

Map of

Barren Ridge Renewable Transmission Project

Showing Location of

Application/Treatment Areas

FIGURE 1 BRRTP COMPONENTS AND ACTION AREA

Treatment Area

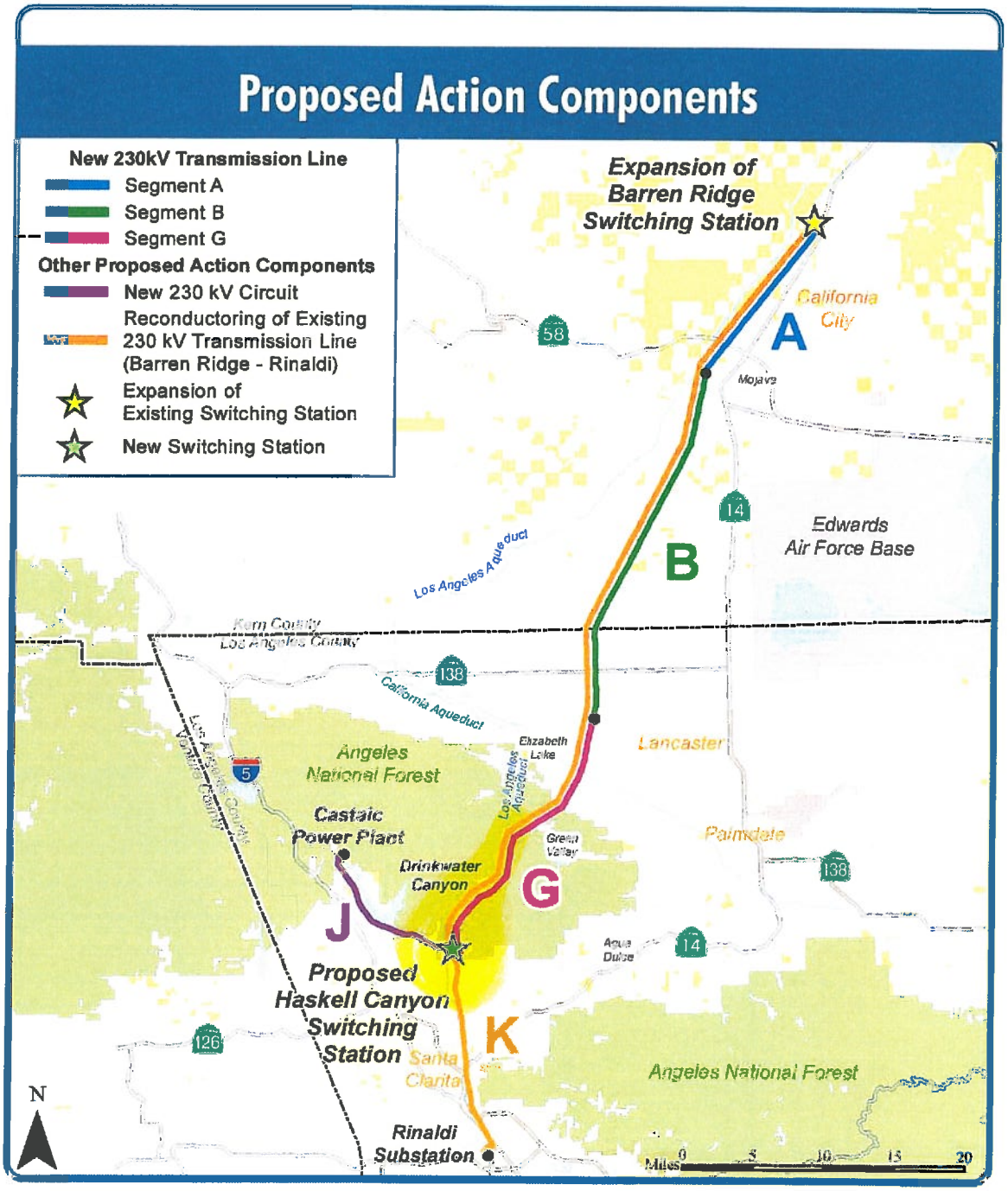
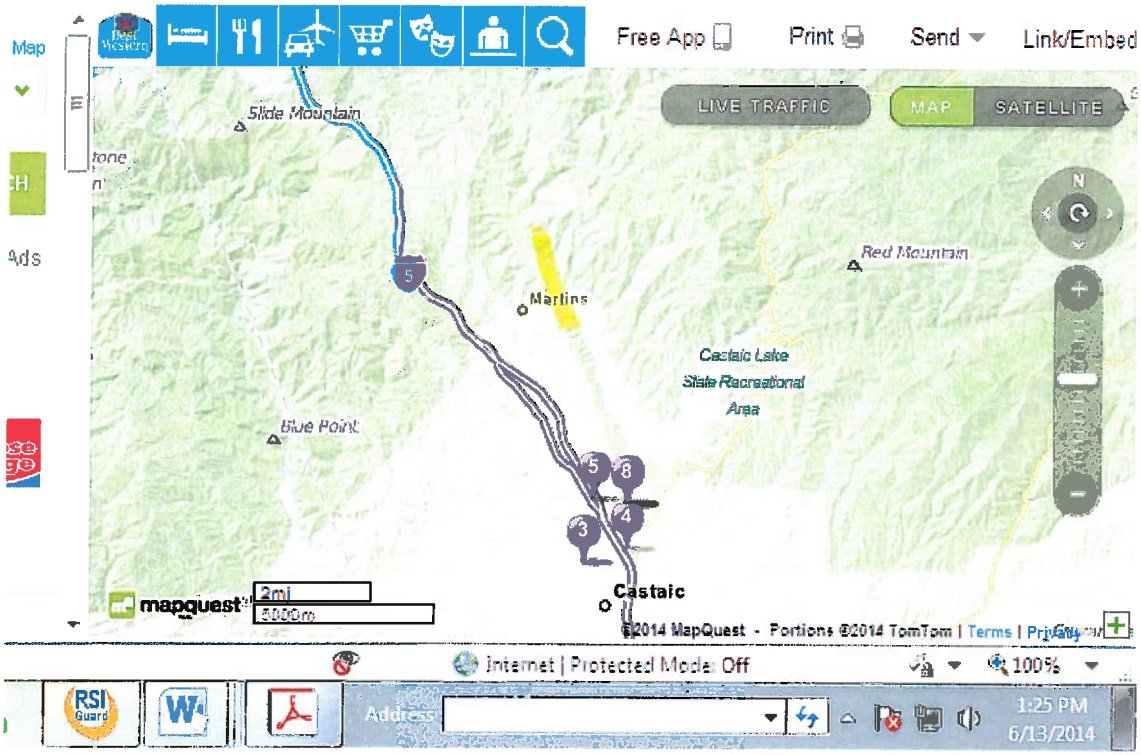


Figure D.
Map of Castaic Creek
Showing Location of
Application/Treatment Areas


Free App
Print
Send
Link/Embed
LIVE TRAFFIC
MAP
SATELLITE
Slide Mountain
Red Mountain
Martins
Castaic Lake
State Recreational
Area
Blue Point
Castaic
mapquest
2mi
5000m
©2014 MapQuest - Portions ©2014 TomTom | Terms | Privacy
Internet | Protected Mode: Off
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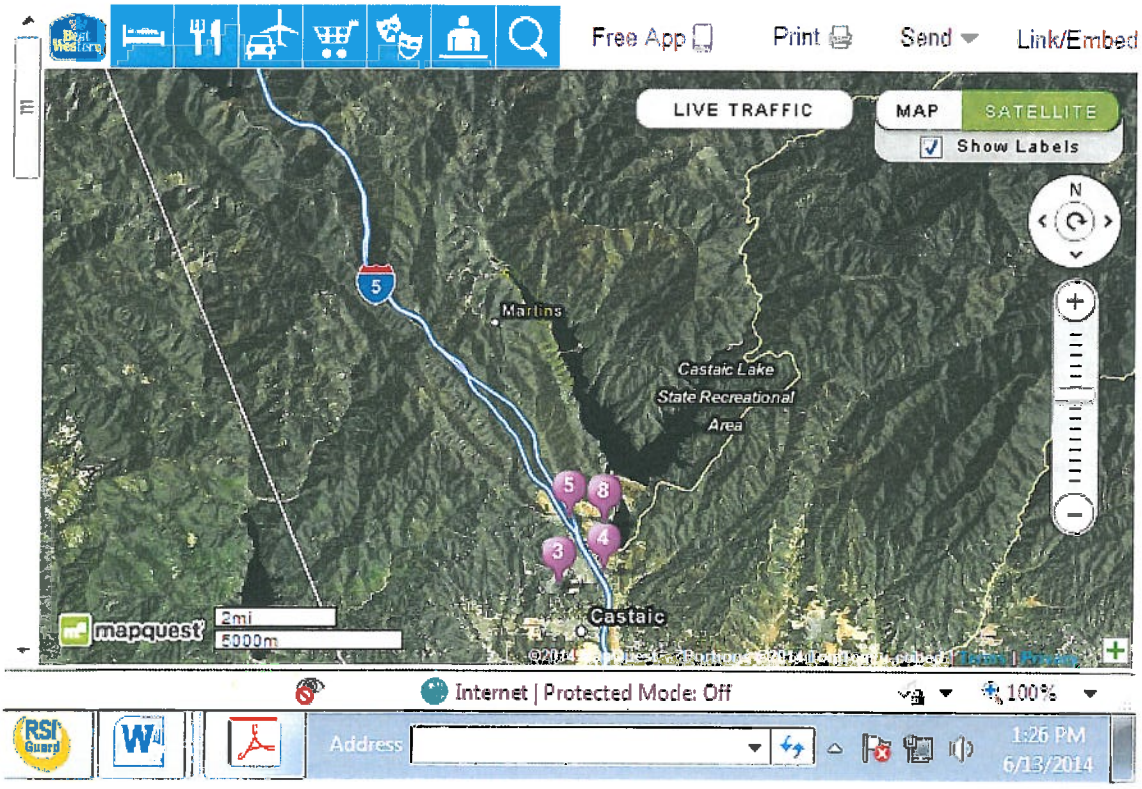
6/13/2014


Free App
Print
Send
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LIVE TRAFFIC
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Show Labels
Martins
Castaic Lake
State Recreational
Area
Castaic
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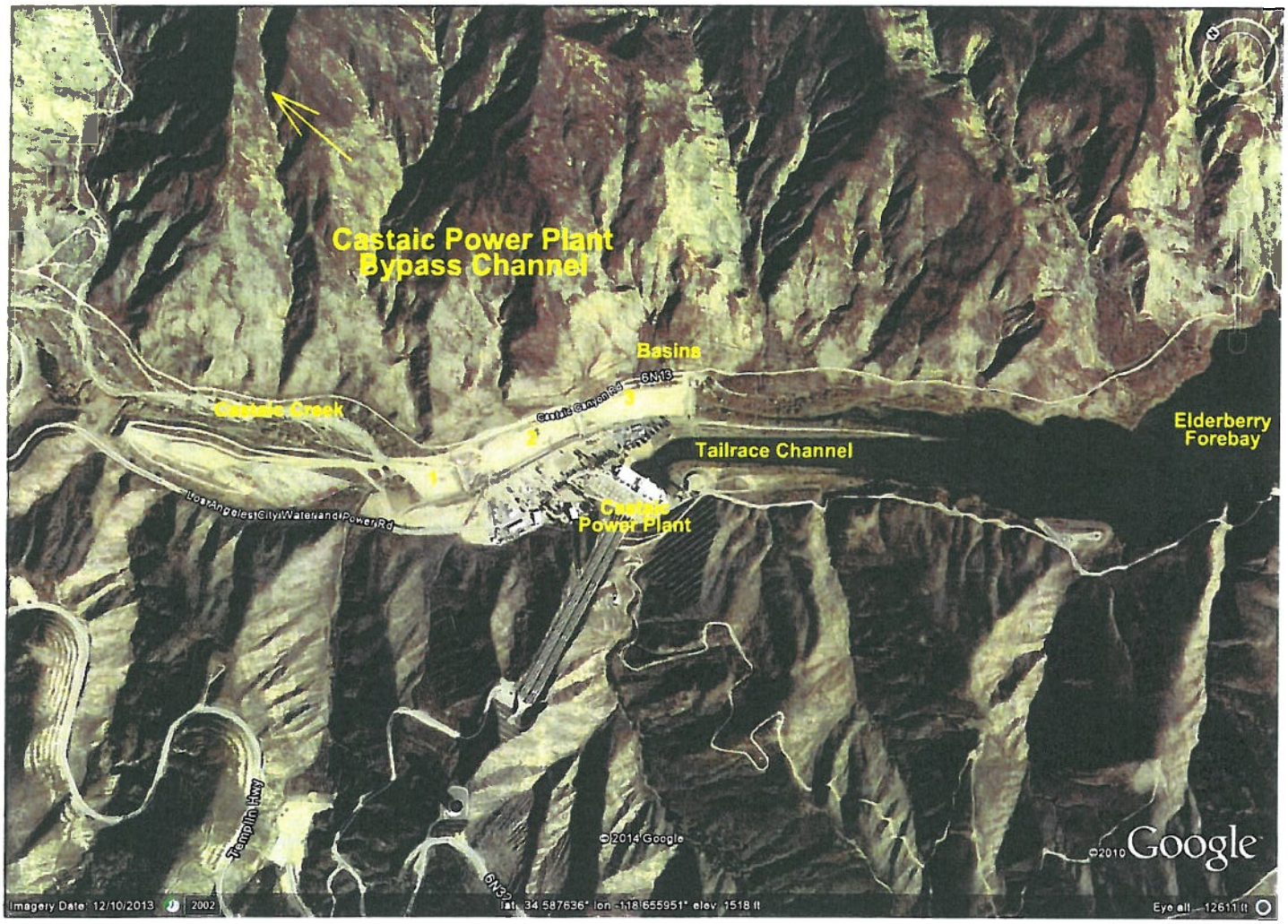
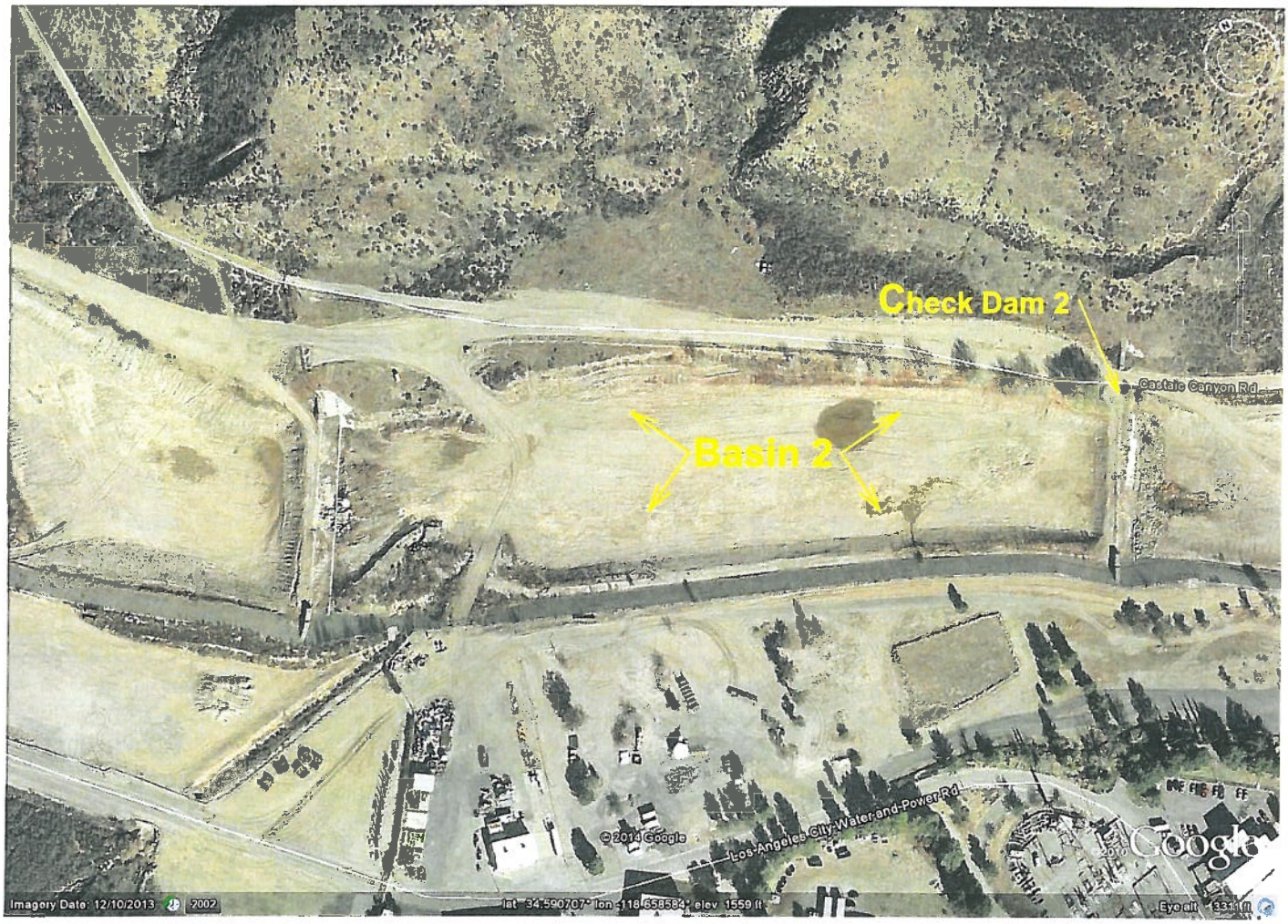
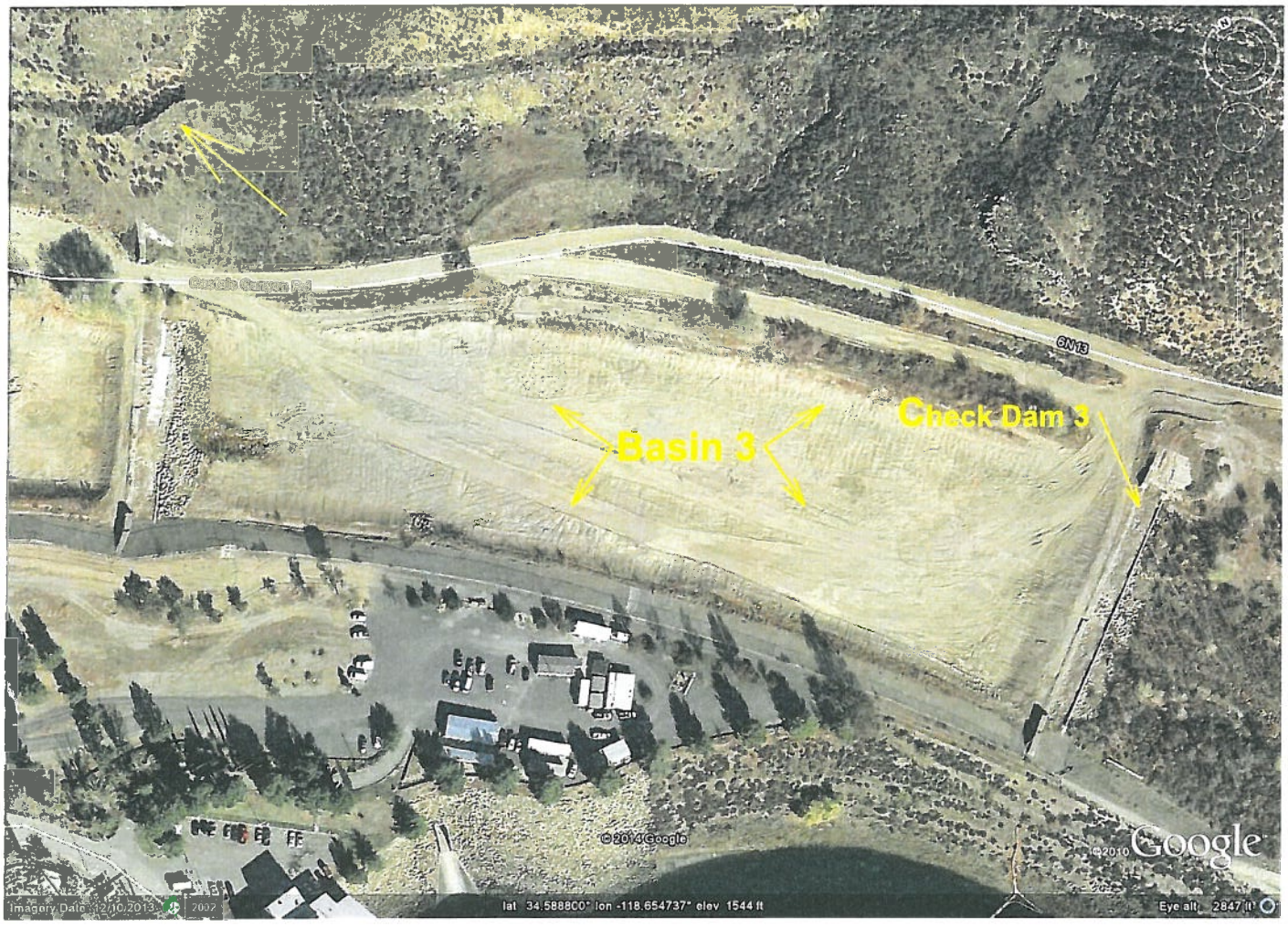
6/13/2014


Castaic Power Plant
Bypass Channel
Basins
Castaic Creek
Castaic Canyon Rd
6N13
Elderberry
Forebay
Tailrace Channel
Los Angeles City Water and Power Rd
Castaic
Power Plant
Templin Hwy
6N32
©2014 Google
©2010 Google
Imagery Date: 12/10/2013
2002
lat 34.587636° lon -118.655951° elev 1518 ft
Eye alt 12611 ft

Check Dam 1
Basin 1
© 2014 Google
Google
Imagery Date: 12/10/2013
2002
lat 34.591740° lon -118.660779° elev 1578 ft
Eye alt 2491 ft


Check Dam 2
Basin 2
Castaic Canyon Rd
Los Angeles City Water and Power Rd
© 2014 Google
Google
Imagery Date: 12/10/2013
2002
lat 34.590707° lon -118.658584° elev 1559 ft
Eye alt 331 ft


Basin 3
Check Dam 3
6N13
© 2014 Google
Google
Imagery Date: 12/10/2013
lat 34.588800° lon -118.654737° elev 1544 ft
Eye alt 2847 ft

APPENDIX A.
Monitoring Plan

Selection of Monitoring Sites

The Monitoring and Reporting Program for Water Quality Order No. 2013-0002-DWQ sets the following sampling frequency:

"Collect samples from a minimum of six application events for each active ingredient in each environmental setting (flowing water and non-flowing water) per year, except for glyphosate. If there are less than six application events in a year, collect samples during each application event for each active ingredient in each environmental setting (flowing water and non-flowing water). If the results from six consecutive sampling events show concentrations that are less than the receiving water limitation/trigger for an active ingredient in an environmental setting, sampling shall be reduced to one application event per year for that active ingredient in that environmental setting. If the yearly sampling event shows exceedance of the receiving water limitation/trigger for an active ingredient in an environmental setting, then sampling shall return to six application events for that active ingredient in each environmental setting. For glyphosate, collect samples from one application event from each environmental setting (flowing water and non-flowing water) per year." LADWP applies aquatic herbicides to the flowing and non-flowing sites as shown in the table below.

Site Type:	Aquatic Herbicide	Application Sites (Number)	Estimated No. of Applications/ Year
a. Flowing			
Van Norman Complex	Glyphosate-based Roundup or Roundup Custom for Aquatic and Terrestrial Use.	3	1
Lower Franklin Reservoir Facility	Glyphosate-based Roundup or Roundup Custom for Aquatic and Terrestrial Use.	3	1
Barren Ridge Renewable Transmission Project	Glyphosate-based Roundup or Roundup Custom for Aquatic and Terrestrial Use and Garlon (triclopyr)	10-39 (number to be lowered, per Nadia	1
Castaic Creek	Glyphosate-based Roundup or Roundup Custom	2	1

a. Flowing: Samples will be collected once annually at the Van Norman Complex, the Lower Franklin Reservoir Facility, the Barren Ridge Renewable Transmission Project, and Castaic Creek, as these sites are to be treated only once annually.

b. The ingredients to be monitored for are glyphosate (the active ingredient in Roundup or Roundup Custom) and triclopyr, the active ingredient in Garlon, which is used only at Barren Ridge.

Physical, chemical and visual monitoring parameters are shown in Tables A1 and A2. Visual observations only (Table A2) will be done at all application sites. All laboratory analyses will be conducted by a laboratory certified by CDPH to do such analyses. Laboratory results will be reported in the annual report to the appropriate Regional Board/s. Records will be maintained for a minimum of three years from the date of sample measurement or report.

Table A1

PHYSICAL AND CHEMICAL MONITORING PARAMETERS

Constituent/Parameter	Sampling Method	Analytical Method
1. Water Temperature (°F)	Grab[1]	See USEPA Guidelines
2. pH (number)		
3. Turbidity (NTU)		
4. Electrical Conductivity (umhos/cm)		
5. Active ingredient[2] (µg/L)		
6. Dissolved Oxygen (mg/L)		

[1] Samples will be collected at three feet below the surface of the water body or at mid-water column depth if the depth is less than three feet, as stipulated in Table C-1 Monitoring Requirements of Order No. 2013-0002-DWQ.
[2]Dissolved copper, diquat, fluridone, imazamox, and triclopyr.

Table A2

VISUAL MONITORING PARAMETERS IN THE

Parameter	Description
1. Monitoring Area	Forebay, stormwater channel, intake channel, natural stream
2. Appearance of waterway	Sheen, color, clarity
3. Weather Conditions	Fog, wind, rain

Types of Monitoring Required (Water Quality Order 2013-0002-DWQ)

a. Background Monitoring

Background monitoring samples shall be collected upstream at the time of the application event or in the application area just prior (up to 24 hours in advance of) the application event.

b. Event Monitoring

Event monitoring samples shall be collected immediately downstream of the treatment area in flowing waters or immediately outside of the treatment area in non-flowing waters, immediately after the application event, but after sufficient time has elapsed such that treated water would have exited the treatment area.

c. Post-Event Monitoring

Post-event samples shall be collected within the treatment area and within one week after the application event.

LADWP Monitoring for Water Quality Order 2013-0002-DWQ

1. Type: flowing

a. Van Norman Complex

Aquatic Herbicide Applied: Glyphosate-based Roundup or Roundup Custom for Aquatic and Terrestrial Use.

Treatment areas: The treatment area is variable and dependent upon the location of invasive species as determined by monitoring. For each application event, a map will be submitted in the annual report to the Regional board showing the application area and treatment area.

Monitoring: Refer to Table A3 for monitoring sample types, timing of sample collection, and sample location.

b. Lower Franklin Reservoir Facility

Aquatic Herbicide Applied: Glyphosate-based Roundup or Roundup Custom for Aquatic and Terrestrial Use.

Treatment areas: The treatment area is variable and dependent upon the location of invasive species as determined by monitoring. For each application event, a map will be submitted in the annual report to the Regional board showing the application area and treatment area.

Monitoring: Refer to Table A3 for monitoring sample types, timing of sample collection, and sample location.

c. Barren Ridge Renewable Transmission Project

Aquatic Herbicide Applied: Glyphosate-based Roundup or Roundup Custom for Aquatic and Terrestrial Use and Garlon (triclopyr).

Treatment areas: The treatment area is along the construction path for transmission lines and a switching station. The initial (pre-construction) weed/invasive species treatment is required by the Forest Service. It is unknown if future treatment will be required. If it is, the treatment areas will likely be variable and dependent upon the location of weeds/invasive species as determined by monitoring. For each application event, a map will be submitted in the annual report to the Regional board showing the application area and treatment area. *Note:* At the time this document was prepared, only one stream in the treatment areas had flowing water and it was located more than 50' from the identified treatment areas.

Monitoring: Refer to Table A3 for monitoring sample types, timing of sample collection, and sample location.

d. Castaic Creek

Aquatic Herbicide Applied: Glyphosate-based Roundup or Roundup Custom for Aquatic and Terrestrial Use.

Treatment areas: The treatment area is the Spillway and debris basin. For each application event, a map will be submitted in the annual report to the Regional board showing the application area and treatment area.

Monitoring: Refer to Table A3 for monitoring sample types, timing of sample collection, and sample location.

TABLE A3

Monitoring at LADWP Facilities: Timing and Location

Sample Type	**Timing of Sample Collection**	**Flowing** (stormwater channel, intake channel, natural stream)
Background	Samples shown in Table A1 and A2 will be collected within 24 hour prior to the application event	Samples shown in Table A1 and A2 will be collected within the application area
Event	Samples shown in Table A1 and A2 will be collected after the application event	Samples shown in Table A1 and A2 will be collected outside of the treatment area after the application event
Post-event	Samples shown in Table A1 and A2 will be collected within seven days after the application event, or when treatment is deemed complete.	Samples shown in Table A1 and A2 will be collected within the treatment area

Enclosure 1

Notice of Intent (NOI)
Los Angeles Department of Water and Power

Enclosure 2

Permit application fee check in the amount of $1,704

Enclosure 3

Permit application fee check in the amount of $358

Los Angeles Department of Water & Power

ERIC GARCETTI
Mayor

Commission
MEL LEVINE, *President*
WILLIAM W. FUNDERBURK JR., *Vice President*
JILL BANKS BARAD
MICHAEL F. FLEMING
CHRISTINA E. NOONAN
BARBARA E. MOSCHOS, *Secretary*

MARCIE L. EDWARDS
General Manager

RECEIVED
JUN 17 2014
DIVISION OF WATER QUALITY

June 9, 2014

Ms. Victoria Whitney
Deputy Director
California State Water Resources Control Board
Water Quality Division
1001 I Street, 15th Floor
Sacramento, California 95814

Attention: Mr. Russell Norman

Dear Ms. Whitney:

Subject: Submittal of Notice of Intent for Coverage Under the General National Pollutant Discharge Elimination System (NPDES) Permit For Residual Aquatic Pesticide Discharges From Algae and Aquatic Weed Control Applications, Water Quality Order No. 2013-0002-DWQ
General Permit No. CAG990005

Enclosed please find the Notice of Intent (NOI-Enclosure 1) for coverage under the General National Pollutant Discharge Elimination System (NPDES) Permit for Residual Aquatic Pesticide Discharges From Algae and Aquatic Weed Control Applications, Water Quality Order No. 2013-0002-DWQ, General Permit No. CAG990005, from the Los Angeles Department of Water and Power (LADWP).

The Aquatic Pesticide Application Plan (APAP) has been prepared and is attached to the NOI (Attachment 1). As discussed in our telephone conversation with Mr. Russell Norman on December 20, 2013, the APAP includes all LADWP facilities where weed control applications are planned. LADWP will submit a revised APAP should it be determined
that weed control applications are needed at additional facilities.

Also enclosed are two permit application fee checks in the amount of $1,704 and $358, (Enclosures 2 and 3) for a total payment of $2,062 dollars.

111 N. Hope Street, Los Angeles, California 90012-2607 *Mailing address:* Box 51111, Los Angeles, CA 90051-5700
Telephone: (213) 367-4211 www.LADWP.com

If there are any questions or if further information is required, please contact Ms. Jennifer Pinkerton of the Wastewater Quality and Compliance Group at (213) 367-4230.

Sincerely,

Katherine Rubin
Manager of Wastewater Quality and Compliance

JP:lr
Enclosures
c/enc: Mr. Tom Howard, Executive Director, California State Water Resources Control Board (SWRCB), 1001 I Street, 25th Floor
Ms. Caren Trgovcich, Chief Deputy Director, SWRCB, 24th Floor
Mr. Jonathan Bishop, Chief Deputy Director, SWRCB, 24th Floor
Ms. Jennifer Pinkerton