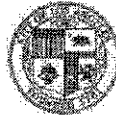


Department of Water and Power

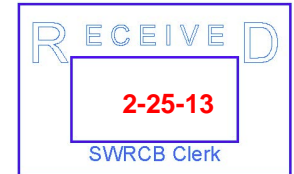


the City of Los Angeles

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February 25, 2013

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

Submitted by email to commentletters@waterboards.ca.gov

Dear Ms. Townsend:

Subject: Comment Letter – Board Workshop: Scientific basis for development of
statewide policy for biological objectives

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to submit comments on the scientific basis for development of Statewide Biological Objectives. LADWP recognizes the importance of protecting the beneficial uses of the waters within its purview to ensure the health of aquatic life and the health of those who recreate in the waters of LADWP's regions of operation.

On January 23, 2013 a workshop was held to present an overview of the scientific basis for biological objectives in perennial, wadeable streams. Briefly, the discussion panel updated the public on the development of a tool called the California Stream Condition Index (CSCI), which will be used to develop thresholds for determining the biological health of perennial wadeable streams. After the tool is used, a waterbody may be flagged as being in a warning status or an impaired status using threshold levels that are still being discussed amongst the Science Advisory Committee (SAC). In order to determine management options, another tool developed by the United States Environmental Protection Agency (USEPA), called Causal Assessment Decision Diagnostic Information System (CADDIS) is proposed to determine the actual stressors that are causing impairments to the biological populations or structure.

LADWP's comments are detailed on the following pages.

Water and Power Conservation ... a way of life

111 North Hope Street, Los Angeles, California 90012-2607 Mailing address: Box 51111, Los Angeles 90051-5700
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1. **Selection of Thresholds for the CSCI:** The warning and impaired thresholds used for CSCI may end up causing some reference streams to be identified as being biologically impacted. In doing so, it is not clear how to manage waters that are paired with reference streams that are impacted. Dischargers and watershed managers should not be required to make local streams better than their designated reference streams. Also, there should be a different set of thresholds for different types of streams. For example, a pristine stream in a mountain watershed fed by winter snowfall should have different thresholds than a stream in an arid area with low flow and low slope. Also, at the January 23, 2013 workshop there was mention that intermittent streams may be included under the Policy. If this is the case, a separate set of thresholds are necessary for intermittent streams.

2. **Testing the CSCI in Local Waters:** Some time is needed to test the CSCI so that stakeholders can learn how it operates. Stakeholders need to verify if the CSCI addresses sufficient non-chemical stressors and varieties of streams that may have low scores yet are comparable to local reference streams. Stakeholders also want to know if the CSCI results will cause major changes in how they manage their streams prior to SWRCB approval of the CSCI; stakeholders also desire to help troubleshoot the CSCI if the CSCI is giving incorrect results for a particular type of stream.

3. **Development of the Causal Assessment Decision Diagnostic Information System (CADDIS) for stressor identification:** At the January 23, 2013 workshop an overview of CADDIS was presented. CADDIS is still under development for stressor identification for California streams. Thus, a guidance document that is effective in identifying stressors is not yet available. After using the CSCI to evaluate streams, CADDIS is a vital next step in the process because there are many interrelated non-chemical stressors such as flow, sediment, nutrients, sunlight, and temperature. Also, since incorrect CSCI thresholds may give incorrect determinations of impairment, CADDIS will be an important procedure to identify and correct CSCI thresholds. LADWP looks forward to a draft CADDIS guidance document and procedure for testing in local areas. As mentioned in LADWP's CEQA Scoping comment letter, it is not appropriate to place the burden of biological assessments solely on NPDES permittees, who will be incapable of addressing habitat degradation and other non-water quality causes of biological impairments.

LADWP requests that the State Water Board provide the CSCI tool and also a draft CADDIS guidance so that data from local waters can be used to determine if both the CSCI and CADDIS procedures need some correction or adjustment.

Ms Jeanine Townsend
February 25, 2013
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LADWP looks forward to receiving additional information in order to work with the SWRCB on the biological objectives policy and technical procedures. If there are any questions, please contact Mr. Clayton Yoshida of the Wastewater Quality and Compliance Group at 213-367-4651.

Sincerely

A handwritten signature in cursive script, appearing to read "Katherine Rubin".

Katherine Rubin
Manager, Wastewater Quality and Compliance Group

CY:cy

c: Mr. Clayton Yoshida