

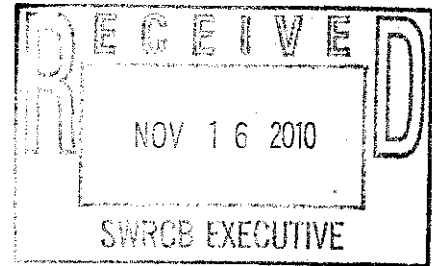


San Diego County Water Authority

4677 Overland Avenue • San Diego, California 92123-1233
(858) 522-6600 FAX (858) 522-6568 www.sdcwa.org

November 16, 2010

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



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OTHER REPRESENTATIVE

County of San Diego

**RE: Statewide General National Pollutant Discharge Elimination system (NPDES)
Permit for Residual Pesticide Discharges to Waters of the United States from
Aquatic Animal Invasive Species Control Applications**

Dear Ms. Townsend,

The San Diego County Water Authority would like to provide comments on the general permit. The Water Authority is a wholesale water agency within San Diego County with 24 member agencies. We receive both raw and treated water from the Metropolitan Water District which is delivered to our member agencies. Our raw water supplies are delivered through connections to surface water treatment plants within the county and are stored in local raw water reservoirs which are owned by the Water Authority and our member agencies. Our local reservoirs also store local runoff. The ability to reasonably move and store the water within San Diego County is critical to maintaining a reliable water supply for our customers. Treating our water supplies as a discharge could impact our ability to move, store and use water.

We would like to offer the following comments and recommendations on the Tentative Order.

Issuance of a Permit Relating to Aquatic Animal Invasive Species Control Should be Delayed

Currently, water suppliers are struggling with the spread of Quagga Mussels within our local conveyance and raw water storage systems. This current best available treatment is chlorine, as specified by the State Department of Fish and Game, which is critical to managing the growth and spread of this invasive species. There has been no demonstrated water quality impacts associated with the existing treatment. In addition, improved methods for control of invasive species are being developed and will be likely to change significantly over the next few years. There is significant expertise in

this area within the water industry. We recommend that you convene a technical advisory committee (TAC) to develop approaches and standards for managing these invasive species and any resulting water quality impacts. This will result in standards that are based both in science and practicality taking into consideration likely chemical treatment that will be used.

The Permit Coverage should Specifically Exclude Regulation of Water Supplies

The permit, as written, applies to the point source discharge of pesticide residues. Currently, our imported water supplies may contain constituents, such as TDS, that are above the basin plan objective. The permit should be clear that all the discharge monitoring and quality specifications apply only to the constituents associated with pesticide application itself and not to other constituents that may already be present in the water supply.

The Chlorine Residual Standards in the Permit Should be Set at Levels Which are Measurable in the Field

The current proposed chlorine residual standard is set at a limitation of 10 ug/L monthly average and 20 ug/L daily maximum. These proposed concentrations cannot be measured using normal field measurement equipment. Transfer of samples to a laboratory could result in a loss of chlorine residual during the process, and a lack of timely results to make a determination of acceptability of the discharge. Therefore, we recommend that you allow measurements in the field using normal field laboratory equipment. The standard should specify acceptable field monitoring approaches and set a standard of non-detect.


A New Rulemaking Process should be Instituted as New Pesticides are Proposed for Application

The current permit should be limited to the application of chlorine for invasive species control. A new rulemaking process should be instituted as new pesticides are added to the permit, so that monitoring requirements can be specified that are applicable to each pesticide that is being used. The permit speculatively includes acute and chronic toxicity monitoring under the premise of not knowing which chemical constituents might be present in aquatic pesticides used in the future. Toxicity testing requirements should be tied only to those applied chemicals where there is demonstrated need for the testing and not to all chemical applications. This issue can be addressed through the rulemaking process.

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We appreciate the opportunity to comment on this permit. If you have any questions regarding this letter, please contact Toby Roy at (858) 522-6743 or Lisa Prus at (858) 522-3252.

Sincerely,



Frank Belock, Jr.
Deputy General Manager

cc: Ken Weinberg
Gary Eaton
Lisa Prus
Larry Purcell
Toby Roy