

Department of Water and Power



the City of Los Angeles

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December 21, 2012



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

Dear Ms. Townsend:

Subject: Comments on Revised Draft 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 (December 5, 2012 9:00 A.M. draft)

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments on the Revised Draft 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 (Revised December 5, 2012 9:00 A.M.)

As a municipal water utility, LADWP must not only provide the highest-quality drinking water, but must also maintain its water conveyance systems, help preserve and expand groundwater supplies through spreading grounds and other water retention systems, and collaborate with several agencies in maintaining flood control channels and adjacent areas. These activities, which are common to many water agencies, may entail the use of algae and aquatic weed control applications.

LADWP appreciates that the State Water Resources Control Board (SWRCB) staff worked with stakeholders to refine the Permit as shown in the Revised Draft 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 (Revised December 5, 2012 9:00 A.M.) (Permit). The revised version is more practical in its approach. LADWP also greatly appreciates that the SWRCB agreed to an effective date of December 1, 2013; this allows water agencies the necessary time to put into place Aquatic Pesticides Application Plan (APAP).

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LADWP supports the Association of California Water Agencies's (ACWA's), recommendations included in its comment letter, which will be submitted to SWRCB this week.

Thank you for this opportunity to provide these comments. Again, LADWP would like to express its appreciation for the SWRCB's staff's hard work in revising this Permit to make it more workable for all parties.

Should you have any questions regarding this letter, please contact Ms. Jennifer Pinkerton of the Wastewater Quality and Compliance Group at (213) 367-4230.

Sincerely,

A handwritten signature in cursive script that reads "Katherine Rubin".

Katherine Rubin
Manager of Wastewater Quality and Compliance

JP:lr
c: Ms. Jennifer Pinkerton