



June 30, 2017

submitted via email

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

RE: Comment Letter - 303(d) portion of the 2014 and 2016 California Integrated Report

Dear Ms. Townsend:

The following comments are submitted on behalf of the Lake Elsinore-Canyon Lake TMDL Task Force ("Task Force") administered by the Santa Ana Watershed Project Authority (SAWPA).¹

The State Board is proposing to add Lake Elsinore to the California's 303(d) list of impaired waterbodies due to elevated DDT concentrations in fish tissue samples (see Decision ID #62314 and LOE #81488). The decision document states that the source of the DDT is: "Unknown."

The Task Force recently learned that DDT was applied to Lake Elsinore in the spring of 1954 by the California Bureau of Vector Control. At the time, the region was undergoing a prolonged drought and state authorities sprayed DDT directly on the dry lakebed to eradicate a severe gnat infestation.² Sixty years ago the harmful side-effects were not yet known and DDT was widely used. It was also applied in Blue Lakes (1949) and Clear Lake (1954).³

Based on this new information, the Task Force recommends that the Source section of the 303(d) Listing Decision be revised to indicate that: ***"DDT was applied directly to lakebed sediments by the California Bureau of Vector Control in 1954."***

The Task Force also recommends that Lake Elsinore be placed in Category 4b of the 303(d) list because *"another regulatory program is reasonably expected to result in attainment of the water quality standard within a reasonable, specified time frame."* DDT has been banned from use in the United States since 1972. There are no controllable discharges of DDT and, for reasons discussed below, the existing federal prohibition is adequate to ensure attainment of water quality standards.

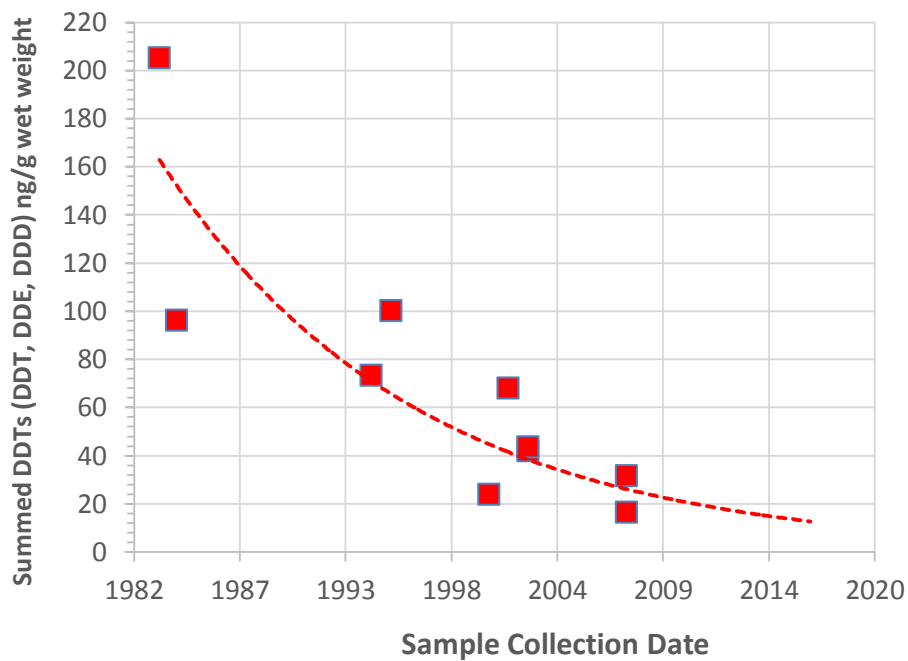
¹ <http://www.sawpa.org/collaboration/projects/lake-elsinore-canyon-lake-tmdl-task-force/>

² [Fortnight Magazine. "California's Most Perverse Lake" September 1, 1954 \(see pg. 16\).](#)

³ [Usinger, Robert L. Aquatic Insects of California. University of California Press. 1956 \(see pg. 30\).](#)

DDT has a half-life of about 10 years.⁴ Therefore, more than 98% of the DDT that was applied to Lake Elsinore in 1954 has since been rendered inert. Long-term monitoring data from Lake Elsinore confirms that DDT concentrations in fish tissue are declining by 50% every 10 years exactly as expected (See Fig. 1). Based on this long-term trend data, DDT concentrations in fish tissue will meet the State Board's *modified* Fish Consumption Goal (15 ppb) by 2018.

Figure 1: DDT Concentrations in Carp Tissue Samples from Lake Elsinore (1982-2007)⁵



EPA's regulatory program prohibiting the use of DDT is working as intended. Consequently, Lake Elsinore should be listed under Category 4b because a TMDL is not needed or required.

Respectfully submitted,

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Timothy F. Moore
(on behalf of the LECL TMDL Task Force)

⁴ National Pesticide Information Center. General Fact Sheet for DDT. 1999 <http://npic.orst.edu/factsheets/ddtgen.pdf>

⁵ Data Source: California Environmental Data Exchange Network (CEDEN).