



THE CITY OF SAN DIEGO



January 29, 2016

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

Re: Comment Letter – Aquatic Animal Invasive Species Control Permit Reissuance

Dear Ms. Townsend:

Thank you for the opportunity to provide comments related to the proposed Aquatic Animal Invasive Species Control Permit reissuance. The City of San Diego shares the concerns expressed by the San Diego County Water Authority in their comment letter on this item, and we offer the following comment:

In Attachment C, Section III.C [beginning on page C-5], the prescribed monitoring plan appears to be specific to direct application of the pesticide to a receiving water body. This Section does not seem to contemplate release of water previously treated with a pesticide into a receiving water. For example, water in a conveyance pipeline might be treated, and then that water released into a receiving water body, resulting in significant dilution. We request the inclusion of an alternative monitoring process for these sorts of unique situations.

If you have any questions, please feel free to contact me or Ms. Rachel Davenport, NPDES Coordinator for the City of San Diego's Public Utilities Department, at (619) 758-2370.

Sincerely,

Cathleen C. Pieroni
External Water Policy Program Manager

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