



CITY of CALABASAS

June 16, 2009

Samuel Unger
Section Chief, Regional Programs
Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

RE: COMMENT ON THE LOS ANGELES REGION INTEGRATED REPORT
CLEAN WATER ACT SECTION 303(D) LIST OF IMPAIRED WATERS.

Dear Mr. Unger,

This letter serves as written notice that the City of Calabasas opposes the inclusion of the New Zealand Mudsail, *Potamopyrgus antipodarum* on the proposed 303(d) listing for Las Virgenes Creek, as stated in the Decision ID 16621.

Since the discovery of the New Zealand Mudsail in the Malibu Creek Watershed, the City of Calabasas has engaged in rigorous Best Management Practices to limit the spread of this non-native snail. These "BMPs" included suspending water quality monitoring programs while locating and researching the New Zealand Mudsail in each tributary of Malibu Creek.

To prevent the unintentional spread of mudsnails during the subsequent water quality monitoring, separate waders were used at each survey location. Additionally, waders were placed in a freezer for a minimum of 48 hours after each use and all equipment was washed and inspected. City of Calabasas participated in the mudsnail "summit" meeting hosted by the Santa Monica Bay Restoration Commission in June of 2006. To promote awareness of this issue the City also posted information signage at various locations along Las Virgenes Creek.

In recent survey conducted by Heal the Bay and the Santa Monica Bay Restoration Commission, it was stated that numbers of mudsnails found in Las Virgenes Creek stations was substantially lower than those of surrounding areas of Malibu Creek. This study also observed native snails within the watershed; Lymnaeidae, *Fossaria* sp. that are nearly identical in size and color to the New Zealand snail, the only difference was fewer number of shell whirls. Additionally, the survey describes that the New Zealand Mudsail has been established in three streams within the Malibu Creek Watershed and shows no evidence of spreading into other streams.

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The New Zealand Mudsail is a non native species found in many watersheds throughout the United States. Currently there is no form or procedure known for eradication of this species. In its native range populations are controlled by a parasitic trematode. There is not any known biological control. Some have suggested introducing the trematode into infested waters. There is still not enough known about the effects of the trematode on native snail species to be confident enough to introduce it.

While the City understands that the snail is non-native and present in Las Virgenes Creek, there is currently no no form or procedure known for eradication of this species. Calabasas has taken all necessary steps to prevent the spread of this non-native snail. The HTB/SMBRC study referenced above observed small numbers of snails in Las Virgenes Creek and no evidence of spreading within the watershed. In addition given the existing science and technology, establishing and complying with a new TMDL for the New Zealand Mudsail would sidetrack efforts and financing better spent on other obtainable TMDLs. We, therefore recommend that the Board remove the New Zealand Mudsail from the proposed 303(d) list for Las Virgenes Creek.

If you need additional information, please contact Alex Farassati, Environmental Services Manager, at (818) 878-4225 ext. 307.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Anthony Coroalles', with a long, sweeping underline that extends to the right.

Anthony Coroalles
City Manager