



September 17, 2026

Comment letter submitted via email to Regulations@wildlife.ca.gov

California Department of Fish and Wildlife
Regulations Unit
Attn: Daphne Nandino, Analyst
P.O. Box 944209
Sacramento, CA 94244-2090

RE: Comment Letter regarding Revised Draft of Amendments to Sections 650, 672, 672.1, and 672.2 of Title 14 of the California Code of Regulations

Dear Ms. Nandino:

The Association of California Water Agencies (ACWA) and the undersigned organizations appreciate the opportunity to continue to provide comments to the California Department of Fish and Wildlife (CDFW) on the revised proposed regulatory amendments to Sections 650, 672, 672.1, and 672.2 of Title 14 of the California Code of Regulations regarding the management of invasive mussels. ACWA represents approximately 470 local public water agencies that supply water for domestic, agricultural, and industrial uses to over 90 percent of California's population.

Invasive mussels negatively impact California water systems' ability to store and convey drinking and irrigation water, generate hydropower, and manage flood control facilities. Once established, they can spread rapidly through connected water systems, compounding their impact over time. While we appreciate CDFW's efforts to align regulations regarding invasive mussel management with current conditions and to explore proactive measures to further prevent their spread, we are disappointed that the amended proposed regulatory text does not address any of the concerns we raised in the initial 45-day comment period.

We respectfully urge CDFW to address the concerns public water agencies raised as the regulations continue to be updated, guidance disseminated, and control and prevention plans reviewed and implemented. California's public water agencies are at the forefront of carrying out prevention and control efforts to minimize the impacts of invasive mussels; ensuring that they have clear and pragmatic regulations to address this on-going challenge is necessary to mitigate further, drastic consequences. We strongly encourage CDFW to review ACWA's initial comments¹ submitted on August 17 and appreciate the opportunity to provide the following comments to refine the draft revised regulatory text in Section 672.1(c)(1).

Clarify what entities constitute a "party" that may be delegated the authority to enforce Fish and Game Code Section 2301.

In Section 672.1(c)(1), ACWA recommends clarifying the entities that qualify as a "party" that may be delegated authority, or portions of the authority, to enforce Fish and Game Code Section 2301. Clearly identifying the entities eligible to receive this authority and the delegation

¹ [ACWA Comment Letter regarding Amendments to Sections 650, 672, 672.1, and 672.2 of Title 14 of the California Code of Regulations](#), submitted on August 17, 2026

procedures will provide greater regulatory certainty regarding roles and responsibilities. ACWA also requests clarification on whether public water agencies may be delegated this authority and, if so, how that authority would interact with an agency's control or prevention plan.

The proposed regulatory text does not clearly specify what entities constitute a "party", which is concerning because the parties delegated with this authority, or portions of it, likely need guidance on the expectations and responsibilities associated with it. For example, in the revised Section 672.1(c)(1), now that "parties" are included as entities that may oversee mandatory inspections of conveyances that have spent four consecutive nights in known infested waterbodies, it would be prudent to know what CDFW expects of parties in conducting the inspections, and thus possibly issuing subsequent Quarantine Notices, administering quarantine identification devices, and/or impounding conveyances, as well as if training or resources will be provided to assist parties in upholding these responsibilities. Additionally, understanding how CDFW will coordinate with a party conducting inspections pursuant to Section 672.1(c)(1) will be necessary, as the inspections are scheduled in advance through CDFW per subdivision (c)(1)(A).

Additionally, if "party" refers to a contracted company or organization, the same considerations of guidance, training, communication, and coordination mentioned previously should be implemented. Furthermore, ensuring said entity is reputable with regards to conducting inspections of conveyances is critical, as any misstep in the process could pose a threat of a conveyance introducing invasive mussels into uninfested waterbodies.

Conclusion

Our organizations appreciate CDFW's work to update regulations regarding invasive mussel management. In addition to the recommendations provided above, we strongly encourage and request that CDFW continue to coordinate with local water managers and the various state agencies that regulate California's complex water supply system. Diversion and treatment facilities of public water agencies, for example, are regulated by the State Water Resources Control Board's Division of Drinking Water, while conveyance infrastructure – like canals and dams – are overseen in part by the Department of Water Resources and in part by federal partners. Coordination amongst these groups is paramount to effectively and rapidly implement prevention and control efforts related to invasive mussels.

We thank you for your consideration of these comments. If you have any questions, please contact Sophie Morin at SophieM@acwa.com or (916) 669-2388.

Sincerely,

A handwritten signature in black ink that reads "Sophie Morin". The signature is written in a cursive, flowing style.

Sophie Morin
State Relations Advocate
Association of California Water Agencies

Ms. Daphne Nandino
California Department of Fish and Wildlife
September 17, 2026 • Page 3



Jennifer Capitolo
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California Water Association

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