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August 19, 2014

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

SUBJECT: Statewide NPDES Permit For Drinking Water System Discharges to Surface Waters

Thank you for the opportunity to review and present our comments regarding this new permit. Casitas Municipal Water District (CMWD) is a water utility located in Ventura County, Region IV of the State Water Resource Control Board. After reviewing the draft permit, we would like to offer the following comments.

10.1

CMWD is concerned with the complexity of the permit. It is difficult to determine if all of the discharges will be covered, what monitoring and reporting is required for the various discharges, and which effluent limits apply to each discharge. At this point we are unable to determine our ability to comply with the permit, and have been unable to formulate an estimate of costs for increased monitoring, reporting, staffing, telemetry, analyzers etc.

Since CMWD is in located in Region IV, we are subject to the requirements of Attachment G, which may include additional TMDL related requirements in subsequent permit renewal. This introduces even more confusion since it is not known at this point what the future requirements may be.

10.2

We are concerned that the permit may require coverage for discharges exempted under the Federal Waters Transfer Rule. Specifically in our case, water transferred from a river into a drinking water storage reservoir via a diversion canal should not require a permit.

10.3

We are optimistic that the new draft that is scheduled to be released next month will clarify some of these issues. CMWD would like to request an extension between the release of the new draft permit, and the Adoption Hearing that is scheduled for September 23rd 2014, to allow us sufficient time to analyze and provide comments on the new draft.

10.4

CMWD also supports the comments submitted by ACWA and AWWA. We appreciate the opportunity to participate in this process, and look forward to working with you in our joint efforts to maintain environmental water quality.

Thank you for your consideration.

Sincerely,

Susan McMahon
Water Quality Supervisor
Casitas Municipal Water District