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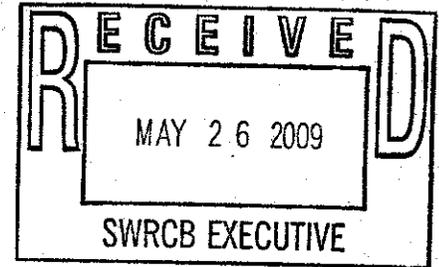
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**MEMBER AGENCY OF THE
METROPOLITAN WATER
DISTRICT
SOUTHERN CALIFORNIA**

May 20, 2009

Ms. Jeanine Townsend
Clerk to the Board, Executive Office
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-0100



VIA EMAIL AND HARD COPY

SUBJECT: Comment Letter – Landscape Irrigation General Permit

Dear Chair Hoppin and Members of the Board

Las Virgenes Municipal Water District and Triunfo Sanitation District, a Joint Powers Authority (Authority), appreciates the opportunity to provide comments on the draft General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water (general permit). The Authority agrees with the intended goals and purpose of the general permit, specifically promoting the expanded use of recycled water in the State, creating additional local non-potable supplies while reducing the amount of imported water along with the related impact on the climate; and providing consistency in setting regulations.

For background, the Authority provides wastewater treatment, biosolids treatment and recycled water in the northwestern portion of Los Angeles County and the southeastern portion of Ventura County. The service area generally consists of the Malibu Creek Watershed and small portions of the Los Angeles River Watershed. Las Virgenes MWD also provides potable water service to its entire service area and Triunfo Sanitation District provides potable water service to the Oak Park portion of their service area. In both cases 100% of the potable water is imported via the State Water Project and then purchased from the Metropolitan Water District of Southern California. The agencies comprising the Authority have a long history of providing recycled water in their respective service areas starting in the 1970s. In the case of Las Virgenes MWD, 20% of its current annual water demand is met with recycled water. Today the Authority has an extensive investment in facilities that span two counties, making beneficial use of a resource that would otherwise go to waste. The planning process and investment in expanding this local resource continues; as an example, the recycled water master plan completed in 2007 identifies over \$25 million in potential expansions of the recycled water system.

In the interests of potable water conservation, beneficial reuse and compliance with the terms of our NPDES permit, we have a compelling interest in continuing to promote and expand the use of recycled water on behalf of the ratepayers who have funded the system. The Authority supports the concept of a general permit and believes that certain changes would improve it. However, we do have some concerns that the general permit could have the opposite result, which is one of deterring or reducing the use and expansion of this valuable resource if changes are not made.



This is our 3rd comment letter on this subject. Many of the concerns we commented on in our June 2008 and April 2009 letters remain valid. Rather than repeat our previous concerns, this letter focuses on the "May" draft.

Section 5.b. Irrigation Management Plans (IMP)

This section requires that the irrigation management plan "shall be applicable for each Recycled Water Use Area". We assume that the word "applicable" was substituted for "developed" in an attempt to clarify that the IMP applies to a "system" rather than each individual customer. If that was the intent, then the current language does not make it clear since items 5.b. i-vi are still required as a part of the IMP. With over 600 water use areas, it is imperative that this section is explicit in stating that the IMP applies to the "system" and items 5.b. i, iii & v. Otherwise, it should be deleted.

There needs to be extensive revision of the Monitoring and Reporting Program (MRP). At the May 19, 2009 public workshop, your staff defended the MRP by stating there would be a significant initial effort by the "administration" but then less effort will be required. This is not the case. As an example, there is a requirement that on a weekly basis, the administrator shall ensure... "areas are examined once per week and visual observations are written in a bound logbook" for six items. With over six hundred water use areas, this requires us to ensure that 3,600 log entries are made each week and that 187,200 entries are made each year. This is a very costly and time consuming proposal and will not provide meaningful information.

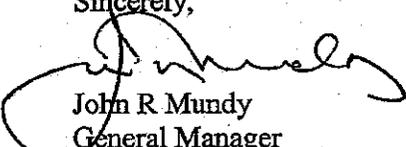
There are many other examples where requirements of the MRP are overly burdensome and provide no benefit in achieving the goal of safe application of recycled water. We suggest that the MRP be revised to require:

1. Reporting on a "system-wide" basis.
2. That the reporting frequency not be less than quarterly.
3. On a "system-wide" basis, the reporting for quantity and quality of water produced be the same as the reporting requirements in the producers permit.
4. That water use areas report to the administrator annually any operational problems that occurred.

Thank you for this opportunity to comment on the "May" draft permit. We hope you take our comments in consideration and make significant revisions to the permit, in particular to the MRP, so that it facilitates the expansion of recycled water use rather than deter it.

If you have any questions or are in need of additional information, please contact David Lippman on my staff at 818-251-2221.

Sincerely,



John R Mundy
General Manager