

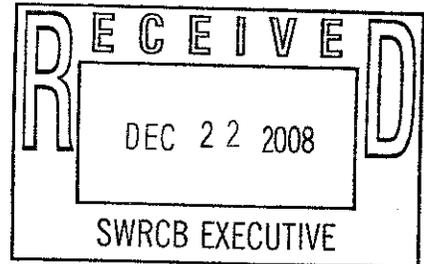
MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

December 22, 2008

VIA EMAIL
commentletters@waterboards.ca.gov

Ms. Tam Doduc, Chair
Members of the State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



Dear Chair Doduc and Members of the Board:

Comment Letter – Proposed Recycled Water Policy

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to provide comments on the draft Recycled Water Policy (Policy) proposed for consideration at the January 6, 2009, State Water Resources Control Board (SWRCB) meeting. Metropolitan is supportive of a policy that provides clear and consistent guidelines to maximize use of recycled water statewide and offset potable water demand while protecting human health and water supplies.

Metropolitan is highly appreciative of the SWRCB's efforts toward developing the Policy. While in support of the Policy, Metropolitan agrees with the comments provided by the California Urban Water Agencies, the Association of California Water Agencies, the California Association of Sanitation Agencies and the WaterReuse Association and offers the following comments to strengthen the Policy's implementation.

- **Conform to CalEPA's "Bill of Rights" for Environmental Permits**

Under the CalEPA's Bill of Rights, permitting agencies shall provide complete and clearly written guidance; publish lists of required information for a complete permit application and criteria to determine whether information is adequate; establish a single lead agency; and identify the time required to complete the full permit review process. A simple reference to this CalEPA's Bill of Rights for Environmental Permits in the Policy will increase certainty in permitting.

- **The Salt/Nutrient Management Plan**

The Policy would be improved if Salt/Nutrient Management Plans were not mandated for recycled water irrigation. The Policy should allow projects that do not exceed the 10 percent (or 20 percent for multiple projects) assimilative capacity to proceed during the development of these plans.

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- **Monitoring Requirements**

Individual recycled water projects should be able to use the production monitoring data for reporting. In addition, irrigation projects should not have any monitoring requirements unless a specific public health issue is identified.

- **Incidental Runoff**

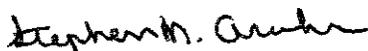
Incidental runoff of recycled water does not present a significant threat to water quality and should not require more than an operations and management plan.

- **The Blue-Ribbon Advisory Panel Report**

The Blue-Ribbon Advisory Panel report should also identify what treatment technologies are currently available to remove constituents of emerging concern in a cost effective and energy efficient manner.

Again, we wish to thank the SWRCB and their staff for developing the Recycled Water Policy and we look forward to advancing the use of recycled water in the State. If you have any questions, please contact Mr. Raymond Jay of my staff at (213) 217-5777 or via email at rjay@mwdh2o.com.

Very truly yours,



Stephen N. Arakawa
Manager, Water Resource Management

RJ:tt