



Carlsbad Municipal Water District

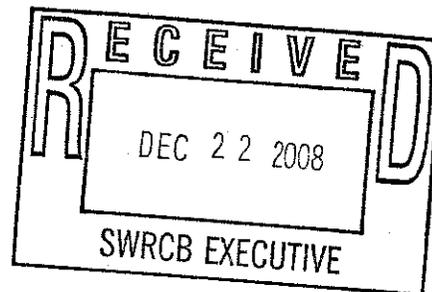
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Public Comment
Recycled Water Policy
Deadline: 12/22/08 by 12 noon

December 22, 2008

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



RE: Comment Letter – Proposed Recycled Water Policy

Dear Members of the Board:

Carlsbad Municipal Water District is very appreciative of the effort that has been made to find verbiage acceptable to all interested groups regarding incidental runoff of recycled water. Reviewing this verbiage, we would like to express concerns with two of the sections. Section 7(a) (1) is very specific, perhaps so specific that it may be difficult for water agency personnel to comply with the requirements. Section 7(a) (4) reads "Management of any ponds such that no discharge occurs unless the discharge is a result of a 25-year, 24-hour storm event or greater, and there is *prior approval for the discharge by the appropriate Executive Officer.*" Because a storm event is not 100% predictable, this requirement would be difficult to comply with, unless there is an amendment to each agency's Discharge Permit.

We would propose replacing Sections 7(a) (1) and 7(a) (4), using the verbiage currently found in the SWRCB February 24, 2004 Incidental Runoff of Recycled Water memo stating "The incidental discharge of recycled water to waters of the State is not a violation of these requirements if the incidental discharge does not unreasonably affect the beneficial uses of the water, and does not results in exceeding an applicable water quality objective in the receiving water."

Thank you for the opportunity to provide our comments on the proposed Policy.

Sincerely,

Steven Plyler
Public Works Superintendent – Water

