February 17, 2017

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

Delivered via e-mail to: commentletters@waterboards.ca.gov


Dear Ms. Townsend:

On behalf of Padre Dam Municipal Water District, thank you for this opportunity to provide comments on the proposed mercury regulations for Part 2 of the Water Quality Control Plan for inland surface waters, enclosed bays, and estuaries of California. Padre Dam provides water, waste water, recycled water and recreational services to a population of 100,000 people in East San Diego County.

There are many legal and policy points on this issue that have been raised by the California Water Association and the Association of California Water Agencies in their letters to the Water Board dated February, 17, 2017. We have concerns that many of the provisions proposed contain program measures that are unfunded and could place a significant hardship and burden on local water agencies and customers.

Padre Dam proposes that the State Water Board not approve the Provisions as written, and instead continue to work with stakeholders to develop new, more reasonable program measures that are directed toward achieving measureable mercury reductions without substantial increases in cost to water and wastewater ratepayers.

Thank you for the opportunity to provide comments on proposed Mercury Provisions and we hope you will consider extending the timing of the process for approving these provisions.

Sincerely,

Allen Carlisle  
CEO/General Manager