Feb. 17, 2017

Jeanine Townsend
Clerk of the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000


Dear Ms. Townsend,

The Carlsbad Municipal Water District (District) appreciates the opportunity to provide comments regarding the Proposed Mercury Regulations. The District provides ratepayers with safe, high quality water supplies and the safety of that supply is our primary goal.

We respectfully request that the State Water Resources Control Board (SWRCB) delay action on the proposed Mercury Regulations until stakeholders have an opportunity to thoroughly review the lengthy staff report and proposal, and can offer comments. Additional time is needed to convene in order to thoroughly understand and discuss impacts to local water and wastewater agencies.

As such, the District requests that SWRCB extend the process and not approve the Provisions as currently written. The SWRCB should continue to work with stakeholders to study and develop a program that achieves measurable mercury reductions without substantial cost increases to water and wastewater ratepayers. If cost increases are eventually needed, then it would be wise for the state and local agencies to have a well-documented and vetted program in place to substantiate any necessary increases through cost of service studies. It would appear that a thorough process would therefore require more time.

Please feel free to contact me should you have any questions regarding the District’s position relative to this matter.

Sincerely,

Wendy Chambers
General Manager

cc: Kimberly Throrner, OMWD
    Robert Yamada, SDCWA