

August 19, 2014

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Ms. Jeanine Townsend
Clerk to the Board
California State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Subject: State Wide Permit for Community Water Systems and Initial Study/Proposed Mitigated Negative Declaration Exception to Surface Water Quality Criteria for Drinking Water System Discharges to Waters of the United States

Dear Ms. Townsend:

The Castaic Lake Water Agency (CLWA) is submitting comments on the Draft State Wide Permit for Community Water Systems (SWP). As a water wholesaler our highest concern is the protection of public health and safety. Since operation of our treatment plants and water conveyance systems require periodic discharge of drinking water for public health reasons, the continued ability to discharge those waters is of utmost concern to us.

We incorporate by reference the technical analysis of this draft permit by Dr. David Kimbrough of Pasadena Water and Power as described in a letter dated August 19, 2014 and signed by numerous water agencies, community water systems and other stakeholders. While the letter covers many impacts of this proposed permit, we would like to reinforce our principal concerns:

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11.1

1. Regulatory Coverage

CLWA currently meets waste discharge requirements under two National Pollutant Discharge Elimination System (NPDES) permits (NPDES CAG674001, CI-8958 and NPDES CAG994004, CI-9799). These permits have functioned well for the control of discharges and the prevention of any negative impacts. Notification, treatment (including dechlorination), sampling and monitoring requirements are specified in these permits, and have been successfully implemented for many years. We do not believe the adoption of a state-wide permit will improve matters that are covered by the local permits and may in fact exacerbate them by diminishing the benefits of local knowledge and experience in the handling of discharges.

11.2

2. Water Quality

We do not believe the discharge of potable water into the environment is a source of negative impacts of water quality. Our current NPDES permits address the requirements to dechlorinate the water and employ well accepted Best Management Practices (BMPs). The turbidity of the discharged water is very low (the raw water from Castaic Lake is typically less than 2 NTU). The sporadic nature and low

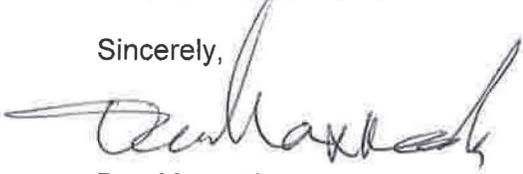
frequency occurrence of these discharges also minimizes their impact as the annual volume is low compared to other sources, both natural and by other dischargers.

11.3 3. Timetable of State Water Permit

We are also concerned with the haste that this proposed permit has been drafted and the proposed timetable for adoption. If this proposed statewide permit is to be implemented, adequate time for all stakeholders to review and comment on the final draft of the permit is essential. We do not believe there is an immediate problem that would require fast-tracking this permit, and that prudent and thorough planning, writing, refinement and review in advance of implementing the permit would benefit all stakeholders.

In conclusion, we respectfully request that the State Water Resources Control Board not adopt this permit and not pursue the effort to develop or adopt a State-Wide NPDES General Permit for Community Water Systems that does not provide clear and real environmental benefits that definitively exceed the combined cost of regulatory enforcement and Community Water Systems compliance that our ratepayers and taxpayers will bear. Thank you for your attention to this matter.

Sincerely,



Dan Masnada
General Manager

cc: Brian Folsom
Mauricio Guardado
Jeff Koelewyn