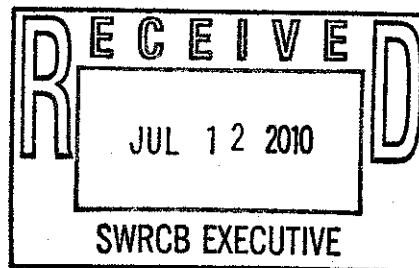


# MERIT SHOP

## ROUNDTABLE



July 12, 2010

Honorable Chair Charles Hoppin  
c/o Jeanine Townsend, Clerk of the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

RE: Comment Letter-Malibu Septic Prohibition Resolution R4-2009-007

SENT VIA U.S. MAIL & EMAIL

Honorable Chair Hoppin:

On behalf of the Merit Shop Roundtable, a statewide association of merit shop contractors and associations I am writing to respectfully request that the State Board revise Resolution R4-2009-007 ("Malibu Septic Prohibition") to exempt all recycled water projects from said prohibition that propose to recycle and reuse 100% of the tertiary treated wastewater generated by such projects.

As a building association our members have been significantly impacted by the downturn in the building industry and the economy as a whole. California is, as is the nation, facing the worst economic period since the great depression. While unemployment in California has reached 12%, in the building trades that number has reached as high as 50%! As a major component of our economy the construction industry can play a significant role in reversing our current state of affairs. That cannot occur if there are not projects being built. There are several projects in the impacted area that have or propose to have a no net discharge system. If these systems meet the standards set by the State Board for water recycling we believe they should be exempted from this prohibition and allowed to move forward. This would protect our natural resources while also allowing much needed construction projects, and the jobs they represent, to move forward thus infusing our economy.

Furthermore, this policy would promote the Recycle Water Policy the State Water Resources Control Board adopted on February 3, 2009. The stated purpose of this policy was to "strongly encourage local and regional water agencies to move toward clean, abundant, local water for California by emphasizing appropriate water recycling, water conservation..." and to "increase the use of recycle water over 2002 levels by at least one million acre-feet per year (afy) by 2020 and by at least two million afy by 2030". We applaud your foresight in encouraging water recycling and thoroughly support this effort by the State Board. Exempting recycled water projects from the proposed resolution will provide a strong incentive for public and private entities to design projects that will both further the purposes of the recently adopted CA Water Recycling Policy and also, as required by the provisions of said policy, avoid negatively impacting the Waters of the State.

In conclusion, the State Board has a very unique opportunity with this prohibition to both solve a growing environmental concern while guiding business to become more green friendly. It is our hope you will take this chance by exempting no net discharge projects from the proposed prohibition.

Sincerely,

  
Gared Larson  
Executive Director