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John R. Mundy

General Manager

Wayne K. Lemieux

Counsel

HEADQUARTERS

4232 Las Virgenes Road

Calabasas, CA 91302

(818) 251-2100

Fax (818) 251-2109

WESTLAKE

FILTRATION PLANT

(818) 251-2370

Fax (818) 251-2379

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(818) 251-2300

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(818) 251-2340

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www.lvmwd.com

MEMBER AGENCY OF THE
METROPOLITAN WATER
DISTRICT
SOUTHERN CALIFORNIA

September 22, 2011

Phil Isenberg, Chairman
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

RE: Comments on Fifth Draft of Delta Plan

Dear Chairman Isenberg:

Las Virgenes Municipal Water District (LVMWD) writes to express concerns pertaining to the Fifth Draft of the Delta Plan, from the perspective of an agency that provides both potable water service and wastewater treatment, including recycled water service for its customer base.

LVMWD will stipulate that "the devil is in the details" where the implementation of California's co-equal goals are concerned, for sustaining water supply and for ecosystem restoration in the Delta.

As an agency that is entirely dependent upon potable water supplies transported through the Delta, LVMWD joins other agencies in expressing concern about the recovery of water supplies lost due to regulatory restrictions that the Bay Delta Conservation Plan attempts to improve. BDCP is further threatened by the draft Delta Plan's proposal that would require future BDCP actions to undergo a review process by the Stewardship Council. We believe it would be more efficient to review the entire BDCP once, to make the final determination that its actions are consistent with the Delta Plan.

Similarly, LVMWD is also concerned that local water management decisions from rate structures to recycling targets could be usurped by the Delta Stewardship Council. LVMWD already has an aggressive conservation and recycling program in place, we do not believe we need guidance from Sacramento on local water management decisions.

LVMWD asks that Delta Plan be modified to move away from a "heavy-handed" regulatory approach and toward a more cooperative strategy. Implementing a plan that is built on cooperation and honed with "real world" experience would seem to provide opportunities to sharpen and fine tune areas that may require more scrutiny. Conversely, attempting to get the entire plan implemented to its finest details in the first attempt may actually lead to its demise. With collaboration, one can be in the mode of continually moving toward the goal; overregulation could likely result in a situation where non-attainment becomes the norm and the subject of unending litigation.

We appreciate the voluminous work done to date. Thank you for the opportunity to comment.

Sincerely,

John R. Mundy
General Manager

