

## The Metropolitan Water District of Southern California State Regulatory Matrix -- Updated as of January 16, 2026

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
Cal/OSHA	<a href="#"><u>Enterprise-Wide and Egregious Violations Rulemaking</u></a>	At the March 25, 2025, Advisory Committee Meeting, Cal/OSHA released a second draft of proposed regulations defining “egregious” (i.e., willful) and “enterprise-wide” violations (i.e., violations at more than one worksite). The draft rule includes a proposed penalty procedure whereby employers cited for enterprise-wide violations associated with workplace safety won’t be eligible for penalty adjustments (except for size) and subject to financial penalty multipliers based on the number of worksites cited within the last five years.	Cal/OSHA’s proposed rules are in response to SB 606 (Gonzalez, 2021) that expanded Cal/OSHA’s authority to issue citations, requirement of abatement, and seek court orders that address workplace safety law violations. For those employers labeled as “egregious,” especially with multiple work locations, the financial penalties can be more severe. Staff is monitoring the proposed regulations.	Awaiting final draft of the regulations.
Cal/OSHA	<a href="#"><u>First Aid Rulemaking</u></a>	On November 28, 2025, Cal/OSHA released a First Aid Rulemaking package to update Title 8, sections 1512 (Construction Safety Orders) and 3400 (General Industry Safety Orders). Key updates include ensuring workplace first-aid kits meet American National Standards Institute (ANSI)/International Safety Equipment Association (ISEA) Z308.1-2021 standards, providing employees with easy access to compliant kits, and requiring employers to assess workplace hazards to update kits accordingly. Additionally, employers may consult with a licensed health care professional as an alternative to meeting ANSI/ISEA-Z308.1 requirements.	Metropolitan’s first-aid kits, located throughout various sites, comply with the current ANSI/ISEA Z308.1 standards. However, there are industry concerns that these requirements are costly and burdensome. Staff will continue to monitor the First Aid Kit Rulemaking.	Written comments and Cal/OSHA’s public hearing were due on January 15, 2026. Subsequent 15-day comment periods will follow.

## The Metropolitan Water District of Southern California State Regulatory Matrix -- Updated as of January 16, 2026

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Cal/OSHA	<a href="#"><u>Horizontal Sliding and Swinging Gates</u></a>	In August 2025, Cal/OSHA released a second draft of its proposed amendments to Title 8, Article 7, Section 3324, regarding horizontal sliding gates. Proposed amendments to Section 3324 aim to establish clear and specific standards for the design, maintenance, inspection, and repair of both horizontal sliding and swinging gates.	If adopted, Metropolitan will need to retrofit all horizontal sliding and swinging gates throughout its service area and implement annual inspections to ensure all gate components are functioning properly. Staff will continue to closely monitor any proposed amendments and official rulemaking process.	Cal/OSHA will continue to hold advisory meetings throughout 2026. An official rulemaking date has not been established.
Cal/OSHA	<a href="#"><u>Indoor and Outdoor Heat Illness Regulations</u></a>	On May 7, 2025, Cal/OSHA released a second draft of its outdoor and indoor heat illness prevention regulations (8 CCR Sections 3395 and 3396) to implement requirements set forth by AB 2243 (Garcia, 2022). AB 2243 required Cal/OSHA to submit a rulemaking proposal for the heat illness and wildfire smoke standards by December 1, 2025, and to consider adopting revised standards by December 31, 2025. The latest draft proposes additional requirements for acclimatization, training of new employees upon hire, and annual training for all employees.	Metropolitan has consolidated its heat illness prevention regulations into a unified program that encompasses both indoor and outdoor environments. Staff is actively monitoring any updates to these regulations and will make the necessary revisions to Health & Safety manuals to ensure compliance with the latest regulatory changes.	Cal/OSHA missed the suggested December 31, 2025, deadline to adopt amendments required by AB 2243 and will resume advisory meetings with stakeholders throughout 2026. Revisions may be delayed due to ongoing federal OSHA rulemaking on heat illness standards which propose stricter requirements than Cal/OSHA's heat standards.

## The Metropolitan Water District of Southern California State Regulatory Matrix -- Updated as of January 16, 2026

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
Cal/OSHA	<a href="#"><u>Workplace Violence Prevention in General Industry</u></a>	SB 553 (Cortese, 2023) requires Cal/OSHA to propose workplace violence (WV) regulations by December 31, 2025, and the Occupational Safety & Health Standards Board to adopt those regulations by December 31, 2026. SB 553 also provides minimum requirements for employer Workplace Violence Prevention Plans (WVPPs). Towards this end, on May 13, 2025, Cal/OSHA released a second draft of its WV regulation, which was discussed at the November 12, 2025, Advisory Committee meeting.	Metropolitan has implemented SB 553 WVPP requirements and will continue to update its WVPP as necessary. Staff is monitoring revisions to the draft WV regulations.	Cal/OSHA will continue advisory meetings with stakeholders through 2026. Awaiting final rule by December 31, 2026.
CARB	<a href="#"><u>Advanced Clean Fleets</u></a>	<p>On July 29, 2025, CARB released a 45-day rulemaking package that combines the repeal of the private fleet provisions in the Advanced Clean Fleets (ACF) Regulations, which must be completed by October 2025 with language to address the passage of AB 1594 (Garcia, 2023).</p> <p>The repeal of the private fleet provisions is required as CARB did not obtain a waiver from the U.S. Environmental Protection Agency (EPA) to fully implement the ACF. The State and Local Government Agency Fleet portion of the rule — which Metropolitan falls under — is still in effect regardless of the status of the EPA waiver. AB 1594 introduced a definition for “traditional utility-specialized vehicles” and alters exemption requirements, potentially</p>	On September 15, 2025, staff submitted comments on the 45-day rulemaking package, raising key issues including expanding the definition of traditional utility-specialized vehicles (TUSVs) to cover Class 2b vehicles, adjusting mileage thresholds for TUSVs to gain early exemption access, and modifying the Mutual Aid exemption to permit more than 25 percent internal combustion engine trucks for emergency response. Staff also recommended removing “tractors” from the list of trucks excluded from the Mutual Aid exemption when available as near-zero-emission vehicle options and expressed concerns about pre-approved TUSV	<p>On September 25, 2025, CARB adopted the changes in the 45-day rulemaking package</p> <p>CARB indicated that further 15-day packages will be released to address additional concerns with the ACF. Rulemaking is set to continue through 2026 with amendments set to take effect before January 1, 2027.</p>

## The Metropolitan Water District of Southern California State Regulatory Matrix -- Updated as of January 16, 2026

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
		<p>allowing utilities to add vehicles to their fleets when zero-emission trucks are not available or suitable for utility-specific operations.</p>	<p>lists and the need for working groups to evaluate zero-emission vehicle performance for at least 12 months before approving them as one-to-one replacements.</p>	
<p><b>CARB</b></p>	<p><a href="#"><u>Zero- Emissions Forklift Rule</u></a></p>	<p>On May 29, 2025, CARB issued an advisory stating that it will not enforce its 2024 Zero-Emission Forklift (ZEF) Regulation on private fleets until the USEPA issues a waiver under the Clean Air Act for the rule. The rule still prohibits public fleet operators from purchasing new propane or gasoline-fueled Class IV (any lift capacity) and Class V forklifts (lifting capacity up to 12,000 lbs.) starting in 2026. Public fleets would need to phase-out 2018 model year (MY) and older forklifts starting in 2028. Public fleet operators would be allowed to purchase used 2025 MY or older forklifts so long as the MY has not been phased out.</p>	<p>The rule requires public fleets, including Metropolitan and its member agencies, to develop a forklift replacement strategy. Staff are working on a forklift replacement strategy for Metropolitan’s 17 propane- and one gas-powered forklifts.</p>	<p>The rule went into effect January 1, 2026. CARB’s nonenforcement advisory only applies to private fleets. Public fleets still need to comply with the rule.</p>
<p><b>Fish and Game Commission</b></p>	<p><a href="#"><u>Regulation to add golden mussel to the list of restricted animals</u></a></p>	<p>On December 12, 2024, the Fish and Game Commission adopted an emergency regulation that adds golden mussels to its list of restricted animals or regulated invasive species. Adding golden mussels to the list of restricted animals will immediately prohibit the importation, transportation, and possession of live golden mussels; as well as allow water managers operating mussel prevention programs grounds to refuse watercraft from launching into waterways. Additionally, it will allow law enforcement</p>	<p>On December 17, 2024, staff submitted comments to the Office of Administrative Law (OAL) requesting that California Fish and Wildlife either amend or delay implementation of the emergency regulation until it is clarified that affected water agencies may operate using control measures or a control plan to avoid infesting other regulated water bodies—similar to how quagga mussels are handled.</p>	<p>The permanent regulations went into effect on December 30, 2025.</p>

## The Metropolitan Water District of Southern California State Regulatory Matrix -- Updated as of January 16, 2026

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
		<p>to detain vessels or equipment until such time as they no longer pose a threat to the environment.</p> <p>In parallel, the Commission adopted a permanent regulation to formally add golden mussels to Title 14, CCR Section 671 as a restricted species, continuing the prohibition on importation, transportation, and possession of live golden mussels beyond the emergency period.</p>	<p>On September 17, 2025, a budget trailer bill, AB 149, was signed by the Governor that added language to Fish and Game Code Section 2301 which requires control plans for golden and other invasive freshwater mussels. Having an approved control plan allows water agencies to continue water operations. Once signed, AB 149 was immediately effective.</p>	
<p><b>Fish and Game Commission</b></p>	<p><a href="#"><u>Petition to list the White Sturgeon as Threatened under the California Endangered Species Act</u></a></p>	<p>On August 13, 2025, the Fish and Game Commission adopted regulations to continue recreational catch-and-release fishing for white sturgeon starting October 1, 2025. These regulations are in response to the California Fish and Game Commission’s approval of white sturgeon as a candidate species under the California Endangered Species Act in June 2024, and CDFW’s peer-reviewed status report indicating that the white sturgeon population has continued to decline. CDFW now estimates there are approximately 6,500 white sturgeon between 40-60 inches long in California. As such, any activity that causes a “take” of white sturgeon will require an incidental take permit from CDFW.</p>	<p>The listing may impact operation of the Central Valley Project (CVP) and State Water Project (SWP), as well as Sites Reservoir, the Delta Conveyance Project and the Agreements to Support Healthy Rivers and Landscapes. The State Water Contractors and San Luis &amp; Delta Mendota Water Authority sent comment letters in June and October 2024 emphasizing that the listing is not warranted as the white sturgeon population is stable, the petition does not use the best available science, and that incidental take from operation of the SWP and CVP has been historically low, especially relative to the take from recreational fishing and the recent die off due to red tides in the San Francisco Bay.</p>	<p>On August 13, 2025, the Fish and Game Commission adopted regulations to continue recreational catch-and-release fishing for white sturgeon starting October 1, 2025.</p>

## The Metropolitan Water District of Southern California State Regulatory Matrix -- Updated as of January 16, 2026

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
			<p>The SWP received incidental take authority under the 2024 Incidental Take Permit at a cost of more than a million dollars, and with a potential water supply impact.</p>	
<p><b>Fish and Game Commission</b></p>	<p><a href="#"><u>Petition to list Western Burrowing Owl as Threatened or Endangered under the California Endangered Species Act</u></a></p>	<p>On October 10, 2024, the Fish and Game Commission determined that the Western Burrowing Owl is a candidate for listing under the California Endangered Species Act, primarily due to loss of habitat. As a candidate for listing, the species is afforded the same regulations and protections as if it were listed as threatened or endangered.</p>	<p>The Western Burrowing Owl exists in Metropolitan’s service area in Southern California. Presence of the species can affect timing of maintenance and construction projects with additional constraints, permitting, and mitigation requirements now that it is a candidate for listing.</p>	<p>The Fish and Game Commission is awaiting the Department of Fish and Wildlife’s 12-month review and recommendation, which is expected in early 2026.</p>
<p><b>Fish and Game Commission</b></p>	<p><a href="#"><u>Petition to list the Quino Checkerspot Butterfly as Endangered under the California Endangered Species Act</u></a></p>	<p>On August 13, 2025, the Fish and Game Commission voted unanimously to declare the Quino Checkerspot Butterfly a candidate species under the California Endangered Species Act (CESA). On December 18, 2024, the California Fish and Game Commission received a petition to list the quino checkerspot butterfly (<i>Euphydryas editha quino</i>) as an endangered species under the CESA.</p>	<p>The Quino Checkerspot Butterfly exists in Metropolitan’s service area in Western San Bernardino, Western Riverside, Orange, Eastern Los Angeles, and San Diego counties. As a “candidate” species, the butterfly is protected, and “take” is prohibited. This can affect the timing of maintenance and construction projects with additional constraints, permitting, and mitigation requirements. If the species is listed as endangered, the take prohibition would be permanent, and the same constraints would remain in place.</p>	<p>The Fish and Game Commission is awaiting the Department of Fish and Wildlife’s 12-month review and recommendation prior to taking any further action, which is expected in September 2026.</p>

## The Metropolitan Water District of Southern California State Regulatory Matrix -- Updated as of January 16, 2026

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
<p><b>Fish and Game Commission</b></p>	<p><a href="#"><u>Petition to list Bendire’s Thrasher and LeConte’s Thrasher as threatened or endangered under the California Endangered Species Act</u></a></p>	<p>On September 16, 2025, the Fish and Game Commission received a petition to list the Bendire’s and LeConte’s Thrashers as threatened or endangered due to low populations and loss of habitat. The petition is currently under review and evaluation by the Department of Fish and Wildlife.</p>	<p>The Bendire’s and LeConte’s Thrashers species are found in arid desert scrub habitats near portions of the CRA. If determined to be a candidate for listing (and if they become listed) it could result in avoidance measures and restrictions on O&amp;M and capital projects along some portions of the CRA and potentially require incidental take permits. This would not affect operations on the Lower Colorado River as they are both upland bird species.</p>	<p>The Department submitted to the Fish and Game Commission its evaluation of the petition for listing. Future actions related to listing may occur at the next Commission meeting in February.</p>
<p><b>Fish and Game Commission</b></p>	<p><a href="#"><u>Petition to list 19 plant species throughout California as threatened or endangered.</u></a></p>	<p>On August 19, 2025, the Fish and Game Commission received 19 separate petitions to list various plants as threatened or endangered. The petitions are currently under review and evaluation by the Department of Fish and Wildlife.</p>	<p>None of the species are found in southern California in Metropolitan’s service area. Some are located in the Sacramento/San Joaquin Bay/Delta. If determined to be a candidate for listing (and if they become listed), it could result in avoidance measures and restrictions on projects on Metropolitan-owned islands and potentially require incidental take permits.</p>	<p>Staff anticipates that the Department’s evaluation and recommendation relating to the petition will be received by the Commission in February 2026.</p>

## The Metropolitan Water District of Southern California State Regulatory Matrix -- Updated as of January 16, 2026

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
<p style="text-align: center;"><b>Fish and Game Commission</b></p>	<p><a href="#"><u>Petition to list the Western Spadefoot Toad as threatened or endangered</u></a></p>	<p>On September 24, 2025, the Fish and Game Commission received a petition to list the northern population of western spadefoot (<i>Spea hammondi</i>) as a threatened species and the southern population of western spadefoot as an endangered species.</p> <p>The petition is currently under review and evaluation by the Department of Fish and Wildlife.</p>	<p>The southern population is found in some portions of Metropolitan’s service area; more specifically there are two known spadefoot population locations along the Santa Ana Valley Pipeline, one along the Santiago Lateral, and two along the Allen-McColloch Pipeline. Additional undocumented populations may also occur within Metropolitan’s project areas. If determined to be a candidate for listing (and if they become listed) it could result in avoidance measures and restrictions on O&amp;M and capital projects and potentially require incidental take permits.</p>	<p>Staff anticipates that the Department’s evaluation and recommendation relating to the petition will be received by the Commission at its February 11-12, 2026, meeting.</p>
<p style="text-align: center;"><b>Fish and Game Commission</b></p>	<p><a href="#"><u>Petition to list the Southern Resident Killer Whale (<i>Orcinus orca</i>) as endangered</u></a></p>	<p>On November 25, 2025, the Fish and Game Commission received a petition to list the Southern Resident Killer Whale (<i>Orcinus orca</i>) as an endangered species.</p>	<p>The Southern Resident Killer Whale forages off the coast of northern California and salmonids from the Bay-Delta watershed form part of its prey base. It is currently listed as endangered under the federal Endangered Species Act. The State Water Project has incidental take coverage under a biological opinion issued by the National Marine Fisheries Service for the coordinated long-term operations of the CVP and SWP. If the Commission determines that listing under CESA may be warranted, it will become a candidate species and receive the</p>	<p>The petition is under review and consideration by the Department of Fish and Wildlife.</p>

## The Metropolitan Water District of Southern California State Regulatory Matrix -- Updated as of January 16, 2026

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
			<p>same protections as if it were listed as threatened or endangered. In that event, DWR may need to amend its CESA incidental take permit for SWP operations to cover incidental take, and the Department of Fish and Wildlife may impose further restrictions on SWP operations to protect the whale's salmonid prey base.</p>	
<p>SCAQMD</p>	<p><a href="#"><u>PAR 1107 -- Coating of Metal Parts and Products</u></a></p>	<p>Proposed Amended Rule (PAR) 1107 prohibits the use of para-Chlorobenzotrifluoride (pCBtF) and tert-Butyl Acetate (t-BAc) in material coatings formulations. The prohibitions will start on July 1, 2026, for most coatings categories and July 1, 2030, for metallic and multi-component coatings. Prohibited coatings must be used within one-year of their phase-out date with their possession being prohibited starting July 1, 2033.</p>	<p>Metropolitan relies heavily on multi-component industrial maintenance coatings and metallic coatings both in the shop and the field for metal parts/structures. Additional testing of new formulations will be required before adding products to the Approved Coatings list.</p>	<p>Rule adopted on December 5, 2025. SCAQMD will conduct a technology assessment by January 1, 2030, to report on the progress of the pCBtF and t-Bac phase-out, including updates on reformulation efforts for coating categories with extended phase-out timelines.</p>
<p>SCAQMD</p>	<p><a href="#"><u>PAR 1113— Architectural Coatings</u></a></p>	<p>Proposed Amended Rule 1113 will seek to phase out two toxic compounds, para-Chlorobenzotrifluoride (pCBtF) and tert-Butyl Acetate (tBAC), and consider interim VOC limits for certain coatings that are being reformulated as well as other amendments to improve clarity.</p>	<p>Metropolitan relies heavily on multi-component industrial maintenance coatings both in the shop and the field for various parts/structures. Additional testing of new formulations will be required before adding products to the Approved Coatings list. Metropolitan coatings currently do not meet proposed VOC limits without pCBtF and tBAC.</p>	<p>A second working group meeting is scheduled for January 20, 2026, with additional sessions continuing throughout the year. Stakeholders and staff will discuss key concerns and proposed concepts during these meetings.</p>

## The Metropolitan Water District of Southern California State Regulatory Matrix -- Updated as of January 16, 2026

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SCAQMD	<a href="#"><u>PR 1445 -- Control of Toxic Metal Particulate Emissions from Laser and Plasma Cutting</u></a>	On June 20, 2025, SCAQMD released revised draft rule language for Proposed Rule (PR) 1445. PR 1445 regulates metal particulate emissions from both portable and stationary laser and plasma cutting operations. Toxic emissions would be reduced from point source emissions by establishing higher efficiency control device requirements, and fugitive emissions would be addressed by requirements for building enclosures, housekeeping, and best management practices.	While this rule is limited in scope to laser and plasma cutting operations, it may set precedent for future toxics regulations (e.g., welding operations). Staff provided informal comments to ensure the proposed regulation reflects the existing exemption for portable plasma cutters performing maintenance and repair activities. Staff has also asked that additional control devices not be required for existing permitted equipment that have already been shown to meet health risk requirements, among other technical issues.	Official adoption date has not been set by SCAQMD. Public workshops to continue.
SCAQMD	<a href="#"><u>Rule 1146 Series, Zero Emission Water Heaters, Boilers and Process Heaters</u></a>	SCAQMD is proposing a series of rules to require all industrial, institutional, and commercial natural gas-powered water heaters, boilers, and process heaters to be replaced or retrofitted with zero-emission technologies such as all-electric heat pumps, or electric resistance units. The rules pertain to equipment with a heat input capacity greater than 5 million British thermal units per hour (MBtu/hr) (Rule 1146), 2 to 5 MBtu/hr (Rule 1146.1), and less than 2 MBtu/hr (Rule 1146.2).	The 1146 Rule series of rules are designed to reduce nitrogen oxide (NOx) emissions in accordance with SCAQMD's 2022 Air Quality Management Plan. Of the three rules, 1146.2 was adopted on June 7, 2024, and has a phased implementation plan between January 1, 2026, and January 1, 2033.	Rules 1146 and 1146.1 — are still under development with no set adoption date. Rule 1146.2 was adopted on June 7, 2024.

## The Metropolitan Water District of Southern California State Regulatory Matrix -- Updated as of January 16, 2026

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SWRCB	<a href="#"><u>Maximum Contaminant Levels for PFOA and PFOS</u></a>	<p>On April 5, 2024, OEHHA adopted PHGs of 0.007 parts per trillion (ppt) for PFOA and 1 ppt for PFOS. A PHG (Public Health Goal) is the level of a drinking water contaminant that does not pose a significant risk to health with lifetime exposure. DDW will use the PHGs to develop drinking water standards for PFOA and PFOS that are as close to the PHGs as possible but still technically and economically achievable for drinking water systems.</p> <p>On February 19, 2025, DDW stated as part of its 2025 regulatory priorities that regulating PFAS was its top priority. DDW intended to adopt the federal PFAS MCL standards in 2025 and work on additional PFAS thereafter.</p>	Once announced, staff will evaluate impacts and potential comments.	Awaiting official release of proposed regulation.
SWRCB	<a href="#"><u>PFAS Monitoring order</u></a>	On November 20, 2025, the Division of Drinking Water (DDW) issued a proposed order requiring community and non transient–noncommunity water systems to conduct initial monitoring for per- and polyfluoroalkyl substances (PFAS). The order is intended to expand statewide PFAS occurrence data and inform future regulatory actions.	<p>Staff collaborated with the California-Nevada Section of the American Water Works Association (CA-NV AWWA) to submit comments urging alignment of California’s proposed PFAS monitoring order with U.S. EPA detection limits and timelines, and to provide clearer public reporting language to avoid unnecessary confusion and loss of public confidence.</p> <p>Metropolitan is currently preparing to comply with the monitoring order.</p>	Written comments were due on December 4, 2025. CA-NV AWWA submitted a comment letter. Metropolitan received the PFAS General Order from the State Water Resources Control Board, Division of Drinking Water, on December 18, 2025.

## The Metropolitan Water District of Southern California State Regulatory Matrix -- Updated as of January 16, 2026

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
SWRCB	<a href="#"><u>Notification and Response Levels for PFOA, PFOS, PFHxS, and PFHxA</u></a>	On October 29, 2025, DDW adopted new and revised Notification Levels (NLs) and Response Levels (RLs) for PFOA, PFOS, PFHxS, and PFHxA to reflect updated health assessments and ongoing coordination with OEHHA. The NLs for PFOA and PFOS were lowered to 4.0 ppt, while the RL for PFHxS was reduced from 20 ppt to 10 ppt, which are the same levels as the federal MCLs for these PFAS. For PFHxA, DDW established a new NL of 1,000 ppt and a new RL of 10,000 ppt. These nonregulatory, health-based benchmarks guide water systems in managing PFAS detections as formal MCL development continues.	The proposed NLs and RLs should have minimal impact on Metropolitan, though they may impact Metropolitan’s member agencies and their respective retail providers. Staff will continue monitoring DDW implementation and OEHHA’s PHG progress.	DDW has adopted the new and revised NLs and RLs.
SWRCB	<a href="#"><u>Notification and Response Levels for Manganese</u></a>	On September 4, 2025, DDW proposed revised notification and response levels for manganese (0.05 mg/L and 0.20 mg/L, respectively) and presented an informational item to the SWRCB on these levels on October 7, 2025. However, the final issuance document has not yet been released.	The proposed NL and RL are significantly lower than the current NL and RL (0.5 ppm and 5.0 ppm, respectively). This NL and RL should not affect Metropolitan. However, some water agencies may need to report more instances of NL and RL exceedances in their Consumer Confidence Reports and/or make operational changes. Metropolitan worked with CA/NV AWWA to provide written comments.	CA/NV AWWA submitted comments on October 3, 2025. Awaiting further action by DDW.

## The Metropolitan Water District of Southern California State Regulatory Matrix -- Updated as of January 16, 2026

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SWRCB	<a href="#"><u>Statewide National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges from Pest Control Applications.</u></a>	<p>On September 26, 2025, the SWRCB released an informal draft proposing to consolidate the following existing statewide NPDES general permits for residual pesticide discharges into one permit (Pest Control Permit):</p> <ol style="list-style-type: none"> <li>1. Aquatic Weed and Algae Control Permit (Water Quality Order 2013-0002-DWQ)</li> <li>2. Vector Control Permit (Water Quality Order 2016-0039-DWQ)</li> <li>3. Spray Applications Permit (Water Quality Order 2016-0040-DWQ)</li> <li>4. Aquatic Animal Invasive Species Control Permit (Water Quality Order 2016-0041-DWQ).</li> </ol> <p>The SWRCB is also proposing to expand the regulatory coverage to include discharges of aerially applied rodenticides and non-pesticidal products used for aquatic weed and algae management.</p>	<p>Metropolitan utilizes the Aquatic Weed and Algae Control Permit for copper sulfate applications in lakes and reservoirs. The proposed consolidation of existing permits into a single permit may impose additional monitoring and reporting requirements on stakeholders, including Metropolitan, which is currently enrolled in only one residual pesticide discharge permit.</p> <p>Metropolitan is collaborating with CMUA to address key concerns faced by utilities affected by the requirements of the proposed Pest Control Permit.</p>	<p>The SWRCB is to release an official draft in May 2026 with subsequent workshops to follow. Final rule is set to be adopted in early 2027.</p>
SWRCB	<a href="#"><u>Underground Storage Tank Regulations</u></a>	<p>On September 3, 2025, SWRCB adopted revised underground storage tank (UST) regulations. The rule deletes all reference to single-walled USTs as they must be permanently closed by December 31, 2025; proposes streamlined construction, monitoring, and testing requirements; utilizes performance goals over prescriptive methods where possible; and reorders the sections within the UST regulations.</p>	<p>The revised regulation affects all water agencies that store hazardous substances (e.g., gasoline or diesel) in USTs. On May 19, 2025, staff submitted a comment letter in response to the SWRCB's latest draft UST regulatory language. Staff comments were geared towards streamlining compliance for Metropolitan's 39 double-walled USTs located throughout its service area.</p>	<p>Amendments were adopted on September 3, 2025, and became effective January 1, 2026.</p>

## The Metropolitan Water District of Southern California State Regulatory Matrix -- Updated as of January 16, 2026

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SWRCB	<a href="#"><u>Water Measurement and Reporting Regulation</u></a>	<p>On September 26, 2025, OAL approved and filed with the Secretary of State chapters 2 and 2.7 revisions of the SB 88 water measurement and reporting regulations, which are now in effect. However, on September 29, 2025, the SWRCB announced it will release additional proposed amendments to chapter 2.8 for public comment in the coming weeks. According to the SWRCB, these changes are intended to provide additional clarity and consistency. Because of these additional revisions, the updated water measurement regulation in chapter 2.8 will become effective later.</p>	<p>Metropolitan submitted written comments on the proposed amendments on April 23, 2025, and submitted written comments on the revised amendments on June 6, 2025. Metropolitan also worked with ACWA, CMUA, and SWC to coordinate comments.</p> <p>The amendments authorizing Alternative Compliance Plans that fail to measure or report diversions will hamstring the SWRCB’s ability to monitor and enforce water rights, complicating or frustrating implementation of the Healthy Rivers and Landscapes Program, enforcement of curtailments during droughts, and potential unlawful diversion of State Water Project supplies. Despite revisions, the draft rule still conflicts with Metropolitan’s water rights policies and policies supporting the Healthy Rivers and Landscapes Program.</p> <p>The only change to the Alternative Compliance Plan regulations via the December 2<sup>nd</sup> update to chapter 2.8 was to extend effective dates given the unanticipated delay in adopting the amendments. Measurement requirements to take effect in Oct 2026.</p>	<p>The rule was adopted on August 5, 2025, with OAL approving chapters 2 and 2.7 revisions. The SWRCB accepted additional changes to chapter 2.8 on December 2, 2025, and submitted to the OAL for approval.</p>

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SWRCB	<a href="#"><u>Water Quality Control Plan</u></a>	On December 12, 2025, the SWRCB released revised Draft Sacramento/Delta Updates to the Water Quality Control Plan (WQCP) for the San Francisco Bay/Sacramento-San Joaquin Delta Watershed (Bay-Delta Plan). The draft updates include additional modeling of impacts and options for the program of implementation for incorporating a regulatory pathway, based on the proposed Plan amendments in the draft Staff Report, or a pathway based on the Healthy Rivers and Landscapes Program. The SWRCB had previously released draft updates in July 2025 but rescinded the draft in September 2025.	Staff is currently reviewing the SWRCB's revised WQCP and have identified significant potential impacts to Metropolitan, including reduced water supplies to Southern California under the SWRCB staff's proposed alternative - approximately 275 thousand-acre feet (TAF) on average and 500 TAF in dry years.	A public hearing to receive comments on the latest draft Bay-Delta Plan will be held January 28-30, 2026. Written public comments are due on February 2, 2026.

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## State Regulatory Matrix – Legend of Acronyms

ACWA – Association of California Water Agencies

CA-NV AWWA – California-Nevada Section of the American Water Works Association,

Cal/OSHA - California Occupational Safety and Health Administration

CARB – California Air Resources Board

CCEEB – California Council for Environmental and Economic Balance

CDFW – California Dept. of Fish & Wildlife

CESA – California Endangered Species Act

CMUA – California Municipal Utilities Association

DTSC –Department of Toxic Substances Control

DWR – Department of Water Resources

DDW – Division of Drinking Water

OAL – Office of Administrative Law

OEHHA – Office of Environmental Health Hazard Assessment

PRR – Phylmar Regulatory Roundtable

SCAQMD – South Coast Air Quality Management District

SWC – State Water Contractors

SWRCB – State Water Resources Control Board

WQCP – Water Quality Control Plan