

The Metropolitan Water District of Southern California

August 18, 2025 – State Regulatory Matrix

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
Cal/OSHA	<u>Workplace Violence Prevention in General Industry</u>	SB 553 (Cortese, 2023) requires Cal/OSHA to propose workplace violence prevention (WVP) regulations by December 31, 2025, and the Occupational Safety & Health Standards Board to adopt those regulations by December 31, 2026. SB 553 also provided minimum requirements for employer Workplace Violence Prevention Plans (WVPPs). Towards this end, on May 13, 2025, Cal/OSHA released a second draft of its WVP regulations.	Metropolitan has implemented SB 553 WVPPs requirements and will continue to update our WVPP as necessary. Staff commented through Phylmar/What Works on the May 13, 2025 draft WVP regulations.	Cal/OSHA will hold advisory meetings with stakeholders through 2025. Awaiting final rule by December 31, 2026.
Cal/OSHA	<u>Indoor and Outdoor Heat Illness Regulations</u>	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). 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 worked with PRR on comments addressing certain ambiguities in the proposed language concerning employee heat acclimatization, and distribution of heat illness prevention plans.	Cal/OSHA will hold advisory meetings with stakeholders through 2025. Awaiting final rule by December 31, 2025.
Cal/OSHA	<u>Enterprise-Wide and Egregious Violations Rulemaking</u>	At the March 25, 2025, Advisory Committee Meeting, Cal/OSHA released a second draft of proposed regulations defining “egregious” (i.e., willful) and an “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 – 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
CMUA – California Municipal Utilities Association
DTSC – Department of Toxic Substances Control

DDW – Division of Drinking Water
OAL – Office of Administrative Law
OEHH – Office of Environmental Health Hazard Assessment
PRR – Phylmar Regulatory Roundtable
SCAQMD – South Coast Air Quality Management District
SWRCB – State Water Resources Control Board

The Metropolitan Water District of Southern California

August 18, 2025 – State Regulatory Matrix

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
CARB	<u>Advanced Clean Fleets</u>	<p>On October 1, 2024, CARB released a discussion draft on amendments to the Advanced Clean Fleets Regulation brought on by the passage of AB 1594 (Garcia, 2023). The draft introduces a definition for “traditional utility-specialized vehicles” and alters exemption requirements, potentially allowing utilities to add internal combustion engine vehicles over 8,500 lbs. to their fleets when zero-emission trucks are not available in similar configurations or suitable for utility-specific operations.</p> <p>On January 14, 2025, CARB withdrew its request for a waiver from the U.S. Environmental Protection Agency to implement portions of its Advanced Clean Fleets regulation. The State and Local Government Agency Fleet portion of the rule — which Metropolitan falls under — will remain in effect regardless of the status of the EPA waiver.</p> <p>On July 29, 2025, CARB released a 45-day rulemaking package that combines the repeal of the private fleet provisions in the ACF rule which must be completed by October 2025, and the AB 1594 rulemaking language. CARB staff acknowledged that additional changes to address public water agency concerns may be included later via 1-day change packets.</p>	<p>In November 2024, Metropolitan provided comments that CARB should expand the definition of “traditional utility-specialized vehicle” under the AB 1594 rulemaking to include vehicles with towing capacities exceeding 30,000 lbs., develop criteria for low-use vehicles, and refine the exemptions for both replacement and addition of new qualified internal-combustion engine powered vehicles. Lastly, staff asked CARB to delay the compliance date for Class 8 ZEVs used to transport extremely hazardous materials, such as chlorine, until 2030 or exempt this application altogether.</p> <p>Metropolitan staff met with CARB representatives on May 7, 2025 (virtually) and on June 17, 2025 (in person), to discuss the vehicle needs to repair and maintain Metropolitan’s extensive infrastructure, as well as for Metropolitan’s role as an emergency responder and mutual aid provider. At the June 17, 2025, meeting, staff also took the CARB members on a tour of the Weymouth facility and demonstrated the unique capabilities and requirements of Metropolitan’s medium- and heavy-duty fleet.</p>	<p>Comments on the 45-day rulemaking package are due September 15, 2025. Awaiting further 15-day changes.</p>

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
 CMUA – California Municipal Utilities Association
 DTSC – Department of Toxic Substances Control

DDW – Division of Drinking Water
 OAL – Office of Administrative Law
 OEHH – Office of Environmental Health Hazard Assessment
 PRR – Phylmar Regulatory Roundtable
 SCAQMD – South Coast Air Quality Management District
 SWRCB – State Water Resources Control Board

The Metropolitan Water District of Southern California

August 18, 2025 – State Regulatory Matrix

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
CARB	<u>Proposed Zero-Emission Appliance Standards</u>	CARB is developing zero-emission appliance standards to require California sales of zero-emission (ZE) space and water heaters by 2030 for new construction or renovating existing buildings. The potential regulation would not require existing non-ZE space and water heaters to be replaced before 2030.	These standards are in line with CARB’s climate and air quality strategy as laid out in the 2022 Scoping Plan and State Strategy for the State Implementation Plan. These standards may impact regional requirements for grid capacity, access to electricity and building retrofit costs.	CARB anticipates adopting the regulation in 2025 with implementation beginning in 2030.
CARB	<u>Zero-Emissions Forklift Rule</u>	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.	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.	The rule goes into effect January 1, 2026. CARB’s nonenforcement advisory only applies to private fleets. Public fleets still need to comply with the rule.
CDFW	<u>Proposed rule governing suspension and revocation of Fish & Game Code section 1602 Lake or Streambed</u>	On November 19, 2024, CDFW circulated revisions to the proposed regulation specifying the procedures for CDFW to suspend or revoke Lake or Stream Alteration Agreements (LSAAs). Fish and Game Code section 1612 authorizes CDFW to suspend or revoke an LSAA if it determines the permittee is not in compliance with its terms or has failed to provide required status reports. The proposed process provides notice and an opportunity to	While Metropolitan has never faced a notice of suspension or revocation, on June 18, 2024, Metropolitan provided comments that the proposed regulation may be problematic to agencies with LSAAs if the notice is erroneous or if the notice does not provide sufficient time to cure alleged violations (or explain why no violation has occurred) before suspension or revocation would be required under the	Awaiting final rule.

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
 CMUA – California Municipal Utilities Association
 DTSC – Department of Toxic Substances Control

DDW – Division of Drinking Water
 OAL – Office of Administrative Law
 OEHH – Office of Environmental Health Hazard Assessment
 PRR – Phylmar Regulatory Roundtable
 SCAQMD – South Coast Air Quality Management District
 SWRCB – State Water Resources Control Board

The Metropolitan Water District of Southern California

August 18, 2025 – State Regulatory Matrix

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
	<u>Alteration Agreements</u>	cure any alleged violations before CDFW would suspend or revoke an LSAA.	regulation. Metropolitan also provided clarification language to address these concerns.	
Fish and Game Commission	<u>Emergency regulation to add golden mussel to the list of restricted animals</u>	On December 12, 2024, the Fish and Game Commission adopted an emergency regulation that adds golden mussel to its list of restricted animals or regulated invasive species. Adding golden mussel 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 to detain vessels or equipment until such time as they no longer pose a threat to the environment.	If golden mussels are detected in Metropolitan’s water supplies, Metropolitan will work with Fish and Game to adopt control measures or a plan to avoid infesting other regulated water bodies. On December 17, 2024, staff submitted comments to the Office of Administrative Law (OAL) requesting that Fish and Game 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 dealt with.	The emergency regulation went into effect on December 19, 2024, without change.

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
 CMUA – California Municipal Utilities Association
 DTSC – Department of Toxic Substances Control

DDW – Division of Drinking Water
 OAL – Office of Administrative Law
 OEHHHA – Office of Environmental Health Hazard Assessment
 PRR – Phylmar Regulatory Roundtable
 SCAQMD – South Coast Air Quality Management District
 SWRCB – State Water Resources Control Board

The Metropolitan Water District of Southern California

August 18, 2025 – State Regulatory Matrix

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
Fish and Game Commission	<u>Petition to list the White Sturgeon as Threatened under the California Endangered Species Act</u>	<p>On June 19, 2024, the California Fish and Game Commission approved white sturgeon as a candidate species under the California Endangered Species Act. As such, any activity that causes a “take” of white sturgeon will require an incidental take permit from CDFW.</p> <p>On July 9, 2025, CDFW released a 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.</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 & 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 take from recreational fishing and the recent die off due to red tides in San Francisco Bay.</p> <p>The SWP received incidental take authority under the 2024 ITP at a cost of more than a million dollars, and with a potential water supply impact.</p>	On August 13, 2025, the Fish and Game Commission is expected to consider whether to continue recreational catch-and-release regulations.
Fish and Game Commission	<u>Petition to list Western Burrowing Owl as Threatened or Endangered under the California Endangered Species Act</u>	On October 25, 2024, the Fish and Game Commission (FGC) 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.	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.	CDFW has until October 25, 2025, to conduct a status review to inform the FGC final decision of whether to list the Western Burrowing Owl as Threatened or Endangered.

Cal/OSHA – California Occupational Safety and Health Administration
 CARB – California Air Resources Board
 CCEB – California Council for Environmental and Economic Balance
 CDFW – California Dept. of Fish & Wildlife
 CMUA – California Municipal Utilities Association
 DTSC – Department of Toxic Substances Control

DDW – Division of Drinking Water
 OAL – Office of Administrative Law
 OEHH – Office of Environmental Health Hazard Assessment
 PRR – Phylmar Regulatory Roundtable
 SCAQMD – South Coast Air Quality Management District
 SWRCB – State Water Resources Control Board

The Metropolitan Water District of Southern California

August 18, 2025 – State Regulatory Matrix

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
Fish and Game Commission	<u>Petition to list the Quino Checkerspot Butterfly as Endangered under the California Endangered Species Act</u>	On December 18, 2024, the California Fish and Game Commission received a petition to list quino checkerspot butterfly (<i>Euphydryas editha quino</i>) as an endangered species under the California Endangered Species Act.	Quino Checkerspot exists in Metropolitan’s service area in Western San Bernardino, Western Riverside, Orange, Eastern Los Angeles, and San Diego counties. If the species becomes a candidate and/or listed as endangered, presence of the species could affect timing of maintenance and construction projects with additional constraints, permitting, and mitigation requirements.	The Fish and Game Commission is awaiting the Department of Fish and Wildlife’s evaluation and recommendation prior to taking any further action.
SCAQMD	<u>PAR 1107 -- Coating of Metal Parts and Products</u>	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 and their possession being prohibited starting July 1, 2033.	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.	Adoption tentatively scheduled for late 2025.
SCAQMD	<u>Rule 1171-- Solvent Cleaning Operations</u>	On June 6, 2025, SCAQMD adopted the amended Rule 1171 which regulates the use of solvents (e.g., liquid denatured alcohol) used for the cleaning of parts, products, tools, machinery, equipment, and general work areas. The rule also phases out the use of para-Chlorobenzotrifluoride (pCBtF) and tert-Butyl Acetate (t-BAC) as cleaning solvents.	Staff worked with SCAQMD staff to allow the continued use of the liquid denatured alcohol to clean electrical equipment, and ozone and chlorine systems. However, the rule does impose limits on the use of aerosol solvents for general parts cleaning for basic maintenance and repair activities.	Rule 1171 will go into effect on January 1, 2026.

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
CMUA – California Municipal Utilities Association
DTSC – Department of Toxic Substances Control

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
SWRCB – State Water Resources Control Board

The Metropolitan Water District of Southern California

August 18, 2025 – State Regulatory Matrix

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
SCAQMD	<u>PAR 1445 -- Control of Toxic Metal Particulate Emissions from Laser and Plasma Cutting</u>	On June 20, 2025, SCAQMD released revised draft rule language for Proposed Amended Rule (PAR) 1445. PAR 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.	SCAQMD anticipates adopting the rule in December 2025.
SCAQMD	<u>Rule 1146 Series, Zero Emission Water Heaters, Boilers and Process Heaters</u>	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 Rule 1146 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 and has a phased implementation plan between January 1, 2026, and January 1, 2033.	Rule 1146 and 1146.1 —public hearing is tentatively scheduled for Fall 2025. Rule 1146.2 adopted on June 7, 2024.

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
 CMUA – California Municipal Utilities Association
 DTSC – Department of Toxic Substances Control

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
 SWRCB – State Water Resources Control Board

The Metropolitan Water District of Southern California

August 18, 2025 – State Regulatory Matrix

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
SWRCB	<u>California Ocean Plan Amendments for Seawater Desalination</u>	On October 29, 2024, the SWRCB held a scoping session to launch the regulatory process for the Ocean Plan. The SWRCB seeks to expand the use of an integrated water resource management and needs assessment, such as an Urban Water Management Plan, for determining the need for seawater desalination facilities; consider tribal interests, human right to water, racial equity, and environmental justice in permitting decisions; and enhance permitting efficiency. The Ocean Plan will also include guidance for slant well studies, mitigation, coastal hazards, and other topics.	On November 13, 2024, Metropolitan submitted comments on the potential amendments to the Ocean Plan. Staff commented that local water agencies should determine the need for seawater desalination, rather than a needs assessment; a permitting pathway should be provided for new technologies such as offshore desalination; and desalination should be developed in concert with alternative supplies and at the discretion of locally elected officials and water agency managers.	Awaiting regulatory draft language.
SWRCB	<u>Cross Connection Control Policy Handbook</u>	On June 17, 2025, the SWRCB adopted an update to its Cross-Connection Control Policy Handbook (CCCPH). Originally adopted on December 19, 2023, the CCCPH replaced the previous Title 17 standards for backflow protection and cross-connection control. The June 2025 CCCPH includes minor revisions for clarity on several requirements and extends the deadline to July 1, 2026 for public water systems to only use Testers and Specialists who receive certification from SWRCB-recognized organizations.	All California public water systems are required to comply with CCCPH by submitting a written Cross-Connection Control Plan by July 1, 2025. Metropolitan submitted two separate Cross-Connection Control Plans for: (1) its desert facilities, and (2) main distribution system. The plans ensure that all facilities are adequately protected against potential cross-connections and meet the standards outlined by the SWRCB's Division of Drinking Water.	The CCCPH took effect on July 1, 2024, with the updates effective immediately.
SWRCB	<u>Maximum Contaminant Level for Perchlorate</u>	In 2017, DDW announced it would review the maximum contaminant level (MCL) established in 2007 for perchlorate at 6 parts per billion (ppb). On October 6, 2020, DDW lowered the detection limit for purposes of reporting (DLR) from 4 ppb to 2 ppb starting in January 2021 and further decreased the DLR to 1 ppb in January 2024. These actions were in response to OEHHA lowering	DDW's perchlorate MCL review and changes to the DLR could result in the MCL being lowered soon, as an MCL must be set as close to the PHG as is technologically and economically feasible. On August 6, 2020, Metropolitan submitted comments expressing concerns that a DLR of 1 ppb was premature	The DLR of 1 ppb went into effect January 1, 2024. Awaiting further action by DDW on revising the MCL.

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
CMUA – California Municipal Utilities Association
DTSC – Department of Toxic Substances Control

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
SWRCB – State Water Resources Control Board

The Metropolitan Water District of Southern California

August 18, 2025 – State Regulatory Matrix

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
		<p>the Public Health Goal (PHG) for perchlorate from 6 ppb to 1 ppb in February 2015. Based on monitoring data, lowering the DLR from 4 ppb to 2 ppb resulted in 33 water systems having 51 new detections of perchlorate, and one third of the submitting laboratories reported finding perchlorate at or below 1 ppb.</p> <p>Perchlorate was not included in DDW’s 2025 regulatory priorities. As such, no action is expected this year.</p>	and that DDW should hold off implementing the lower DLR until such time that adequate laboratory capacity is determined and perchlorate occurrence data at the 2 ppb DLR are collected and evaluated.	
SWRCB	<u>Maximum Contaminant Levels for PFOA and PFOS</u>	<p>On April 5, 2024, OEHHA adopted PHGs of 0.007 parts per trillion (ppt) for PFOA and 1 ppt for PFOS. A PHG 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 intends 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	<u>Maximum Contaminant Level for NDMA</u>	On December 4, 2024, OEHHA proposed lowering the PHG for N-nitrosodimethylamine (NDMA) in drinking water from 3 parts per trillion (ppt) to 0.5 ppt. The development of a PHG is an important step that informs the establishment of an enforceable MCL for drinking water. Currently, NDMA has a non-enforceable Notification Level (NL) of 10 ppt and a Response Level (RL) of 300 ppt which were established in 2002. One of	NDMA is a byproduct of chloramination and other industrial processes. For calendar year 2024, Metropolitan’s treated water effluents and systemwide distribution system have consistently been below the current NL of 10 ppt. Staff worked on a comment letter with ACWA questioning OEHHA’s toxicological	Awaiting further action by OEHHA formalizing the proposed PHG.

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
CMUA – California Municipal Utilities Association
DTSC – Department of Toxic Substances Control

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
SWRCB – State Water Resources Control Board

The Metropolitan Water District of Southern California

August 18, 2025 – State Regulatory Matrix

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
		DDW’s regulatory priorities for 2025 is to evaluate a potential MCL for NDMA.	assumptions that led to the new proposed PHG for NDMA.	
SWRCB	<u>Notification and Response Levels for PFOA, PFOS, PFHxS, and PFHxA</u>	On July 3, 2025, DDW proposed revised Notification Levels (NLs) and Response Levels (RLs) for several PFAS compounds to align with federal MCLs and updated health risk data. Key changes include lowering the NLs for PFOA and PFOS to 4 ppt, lowering the RL for PFHxS to 10 ppt, and establishing a new NL and RL for PFHxA at 1,000 ppt and 10,000 ppt, respectively. NLs are nonregulatory, health-based advisory levels that DDW establishes for contaminants for which regulatory standards have not been set. When an RL is exceeded, DDW recommends that the drinking water system take the affected source of water out of service or provide treatment to reduce the contaminant level. .	Metropolitan monitors for PFAS on an annual basis and has periodically detected certain PFAS near the method detection limits. These proposed NLs and RLs should have minimal impact on Metropolitan, though they may impact Metropolitan’s member agencies and their retail providers. Staff helped prepare oral comments for various industry associations.	An informational item on DDW’s proposal was presented at the SWRCB’s August 6, 2025 meeting. DDW intends to adopt the new NLs and RLs in September 2025.
SWRCB	<u>Notification and Response Levels for Manganese</u>	On February 16, 2023, DDW proposed new notification and response levels (NL and RL) for manganese at 20 parts per billion (ppb) and 200 ppb, respectively. Revising the manganese NL and RL is one of DDW’s 2025 regulatory priorities.	The proposed NL and RL are significantly lower than the current NL and RL (0.5 parts per million (ppm) and 5.0 ppm, respectively). Thus, water agencies may need to report more instances of NL and RL exceedances in their Consumer Confidence Reports and/or make operational changes.	Awaiting further action by DDW.

Cal/OSHA – California Occupational Safety and Health Administration
CARB – California Air Resources Board
CCEB – California Council for Environmental and Economic Balance
CDFW – California Dept. of Fish & Wildlife
CMUA – California Municipal Utilities Association
DTSC – Department of Toxic Substances Control

DDW – Division of Drinking Water
OAL – Office of Administrative Law
OEHH – Office of Environmental Health Hazard Assessment
PRR – Phylmar Regulatory Roundtable
SCAQMD – South Coast Air Quality Management District
SWRCB – State Water Resources Control Board

The Metropolitan Water District of Southern California

August 18, 2025 – State Regulatory Matrix

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
SWRCB	<u>Underground Storage Tank Regulations</u>	On May 2, 2025, SWRCB released a second draft of its proposed underground storage tank (UST) regulations. The draft language 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.	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.	Awaiting formal adoption of the regulations, with an anticipated effective date of January 1, 2026.
SWRCB	<u>Water Diversion Measurement and Reporting</u>	On June 16, 2025, the SWRCB released a second additional 15-day comment period draft of the proposed rule. Written comments were due July 1, 2025. The water diversion, measurement, and reporting regulations implementing the statutes that require water rights holders to measure and report diversions known as SB 88. The proposed amendments are intended to clarify provisions to facilitate compliance and, of concern, to make it easier for diverters to submit and follow Alternative Compliance Plans (ACPs) that do not measure diversions, but purport to provide “sufficient” information in lieu of measuring and reporting actual diversions.	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. The amendments authorizing ACPs 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.	The rule was adopted on August 5, 2025.

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
 CMUA – California Municipal Utilities Association
 DTSC – Department of Toxic Substances Control

DDW – Division of Drinking Water
 OAL – Office of Administrative Law
 OEHH – Office of Environmental Health Hazard Assessment
 PRR – Phylmar Regulatory Roundtable
 SCAQMD – South Coast Air Quality Management District
 SWRCB – State Water Resources Control Board

The Metropolitan Water District of Southern California

August 18, 2025 – State Regulatory Matrix

Agency	Regulation	Summary	Potential Impacts	Regulatory Status
SWRCB	<u>Water Quality Control Plan</u>	On July 24, 2025, SWRCB released a 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 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.	Staff are reviewing the most recent amendments. On January 19, 2024, Metropolitan provided comments individually and through the State Water Contractors on Phase 2 of the WQCP.	SWRCB will hold a public hearing September 8-9, 2025 with written comments due September 10, 2025.

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
 CMUA – California Municipal Utilities Association
 DTSC – Department of Toxic Substances Control

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
 SWRCB – State Water Resources Control Board