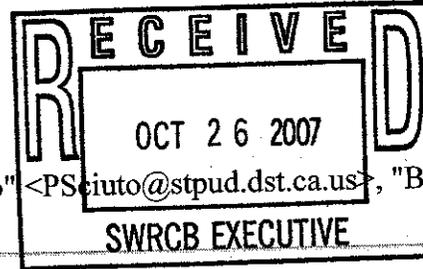


commentletters - Comment Letter - proposed Water Recycling Policy

From: "Julie Ryan" <JRyan@stpud.dst.ca.us>
To: <commentletters@waterboards.ca.gov>
Date: 10/26/2007 8:50 AM
Subject: Comment Letter - proposed Water Recycling Policy
CC: "Richard Solbrig" <rsolbrig@stpud.dst.ca.us>, "Paul Sciuto" <PSciuto@stpud.dst.ca.us>, "Bradley J Herrema" <BHerrema@HatchParent.com>



Jeanine:

The South Tahoe PUD has reviewed the Draft Staff Report and Certified Regulatory Program Environmental Analysis – Water Recycling Policy, and would like to provide the following comments.

First, in the discussion of salts, the recommended alternative is Alternative D. Alternative D establishes an effluent limitation based on an allowable increase in salinity from the public water supply to the produced recycled water. It is not clear which "public water supply" will be used as the baseline. In the case where the produced recycled water is exported to another watershed for application, there are two possible interpretations of this provision.

- 1) The public water supply where the effluent is generated is used as the baseline for salinity.
- 2) The public water supply where the recycled water is applied is used as the baseline for salinity.

Please clarify the intent and application of this provision.

Second, the policy dictates that the discharger will be liable for any past or continuing discharge that causes a violation of future more stringent drinking water standards. This designation of liability appears to be beyond the powers of the State Water Resources Control Board, and in conflict with standing legislation pertaining to California Public Utilities Commission-regulated water providers. Additionally, the policy is silent about to whom the discharger would be liable and for what they would be liable. These issues should be resolved prior to proceeding with the legislation of this policy.

Last, the policy proposes that users be required to establish nutrient management plans that will, in part, limit the amount of recycled water applied based on landscape and crop requirements and leaching potential. This requirement may be in conflict with existing regional water rights decrees, in that the new policy may be interpreted to dictate irrigation practices that are contrary to longstanding methods on which those water rights decrees are based.

Thank you for the opportunity to comment on the draft policy.

Regards,

Julie H. Ryan
Senior Engineer
South Tahoe PUD