



TAHOE-TRUCKEE SANITATION AGENCY

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VIA U.S. MAIL AND FACSIMILE

19 October 2012

Mr. Richard Booth
Chief, TMDL/Basin Planning Unit
Lahontan Regional Water Quality Control Board
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150

RE: 2012 Triennial Review of the Water Quality Control Plan for the Lahontan Region

Dear Mr. Booth:

This letter is in response to your request for written public comments on a draft list of staff-recommended priority topics for the next Triennial Review of the Water Quality Control Plan for the Lahontan Region.

Tahoe-Truckee Sanitation Agency (T-TSA) would like to comment on a topic shown in Table 2 of the 2012 Triennial Review Topic List for the Lahontan Region, which reads:

“Revise Chapter 3 language on determining compliance with water quality objectives”

“The proposed revisions would change water quality objectives expressed as ‘means of monthly means’ to annual means and define minimum sample numbers and sampling frequencies for determining compliance with objectives. This could avoid the need for new Clean Water Act Section 303(d) listings based on very small sample numbers, and facilitate delisting.”

T-TSA understands that the principal reason for the proposed revision is that there are several water bodies within the region for which there is scarce water quality information. Such is not the case for Truckee River. There are considerable data points and water quality data collected all along the River. The period of record is long and continuance. For this reason alone, the means of monthly means standard should continue to be utilized for the Truckee River. In addition, it is appropriate to continue to compare T-TSA’s compliance with water quality objectives (“WQOs”) based on a means of monthly means standard because it takes into consideration severe weather conditions (a major flood event or a severe drought) that may occur in a particular year. Extreme changes in flow can cause changes in the concentration of various background water quality characteristics upstream from T-TSA’s facility, which vary

inversely with flow for some constituents. T-TSA's ability to meet WQOs under such circumstances and using an "annual means" test could be problematical. The mean of monthly means standard, on the other hand, is the average of the monthly variations over a long period of time. This method reflects long-term average water quality based on every month of many years under vastly different hydrological conditions. From T-TSA's perspective, the seasonal and annual variations in water quality due to varying hydrological conditions need to be considered when evaluating T-TSA's potential impacts on water quality and beneficial uses of the Truckee River and Martis Creek.

Further, T-TSA's fairly recent wastewater treatment plant expansion project and its associated settlement agreement with the cities of Reno and Sparks, and the Pyramid Lake Paiute Tribe were premised on the continuation of the means of monthly means standard. It potentially could be very deleterious to T-TSA if such standard now were now changed to the proposed "annual means test."

For the foregoing reasons, T-TSA submits that it would be inappropriate to replace the means of monthly means standard for an annual means standard for the Truckee River. Thank you for the opportunity to comment. If you have any questions or would like to have a follow-up discussion on this matter, please do not hesitate to contact me.

Sincerely,



Marcia A. Beals
General Manager

MAB:ct
Attachment

cc: Jay Parker, Engineering Department Manager
Greg Schleusner, Laboratory Supervisor