

# FUOG WATER RESOURCES INC.

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October 26, 2006

Mr. Roger Briggs  
California Regional Water Quality Control Board  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA. 93401

## RE: LAS PALMAS RANCH - DRAFT DISCHARGE PERMIT, #R3-2006-0041

Dear Mr. Briggs,

On behalf of California American Water we have reviewed the draft discharge permit for Las Palmas. As a result of this review we have a few comments and recommendations for inclusion in the permit:

- 1) Page 3, Item 14: The reference to chlorine should be replaced with disinfection to be more generic, as CalAM will be evaluating the replacement of the existing and proposed chlorination system with a UV disinfection system to reduce the salt content in its effluent.
- 2) Page 7, Item 32. Reference should be made to the 2005 Engineering Report and its water balance. It shows that the currently 40.40 acres of land have been approved for irrigation, but only 27.05 acres are currently used and this has led to the problems as alluded to in items 30 to 32. In addition the water balance prepared by RMC has shown that a total active irrigation area of 67.09 acres is needed to allow reuse of all stored effluent within a 12 month period. We believe the minimum amount of acreage is important to be included in the permit to avoid future problems.
- 3) Page 15, Item 90: As it was suggested to use the 180 foot aquifer as a water quality objective, the second half of the sentence referring to the 450 foot aquifer should be eliminated.
- 4) Page 20, Item 7: This requirement is related to the use of chlorine. We request that an additional condition be included in this permit to allow CalAM to consider use of an UV system for disinfection in accordance with Title 22.
- 5) Page 22, Item 27: The reference to a "weekly" irrigation report seem excessive and should be replaced with "bi-monthly". A weekly reporting puts an unnecessary burden on the distributor to report data from all its use areas on a weekly basis. In addition, the weekly impact on the reservoirs is negligible and within the level of accuracy of depth measurements and thus meaningless. Based on our last 12 months of experience with bi-monthly data exchange, the results have been encouraging and we feel this bi-monthly reporting is adequate.

Item No. 9 Attachment No. 6  
December 1, 2006 Meeting  
Las Palmas Ranch Development

- 6) Page23, Item "Use Area Requirements": an additional requirement should be included that states that a minimum additional acreage of 26.69 must be provided and that the entire area of 69.05 acres must be available to receive effluent by the data herein specified. See also comments under item 2 above.
- 7) Page27, at the end: An item "F. Implementation Schedule" should be included. To allow sufficient time for engineering evaluation, design and construction of the necessary modifications and irrigation area expansions we suggest the following implementation schedule:
  1. Facilities: Completion by Dec 31, 2008
  2. Irrigation Area: Completed by June 30, 2007

We trust that these recommendations are acceptable to you and that you will make the necessary changes or additions to your draft discharge permit. If you have any questions, we will be glad to discuss them with you.

Very truly yours

Rene M. Fuog

cc: Tom Peterson, CalAM  
Ron Lunquist, Monterey County PW  
Frank Vogl, CalAM

cc: Tom Peterson, Cal-AM