



May 29, 2019

VIA EMAIL: David.Woelfel@waterboards.ca.gov

David Woelfel
California Regional Water Quality
Control Board - Santa Ana Region
3737 Main Street, Suite 500
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RE: 2018 DRAFT PRIORITY LIST FOR THE BASIN PLAN TRIENNIAL REVIEW

The Irvine Ranch Water District (IRWD) appreciates the opportunity to comment and participate in the development and finalization of the 2018 Draft Priority List for the Basin Plan triennial review. IRWD supports the inclusion of Issue No. 9, *Consider/review TDS objectives for Rattlesnake, Syphon and Sand Canyon reservoirs based on the use for storage of recycled water.* The Draft Priority List indicates that staff resources are scheduled for this item in the 2021-2022 fiscal year. IRWD staff is committed to working with the Regional Water Quality Control Board (Regional Board) staff to complete the consideration and revision of the water quality objectives for TDS in the recycled water reservoirs.

IRWD has and continues to effectively manage the salinity within our service area to meet TDS water quality objectives at the recycled water reservoirs. IRWD staff strive to maximize water recycling while maintaining the highest quality recycled water for our customers. On an ongoing basis, IRWD recycles essentially all dry-weather and some wet-weather wastewater flows as well as some in-stream flows tributary to the three recycled water reservoirs listed in Issue No. 9. Changing source water conditions due to drought and changing climate conditions as well as water conservation practices can impact the TDS concentrations of the influent sewage treated at IRWD's recycled water plants.

IRWD is currently undertaking a Sewage Treatment Master Plan (STMP) to evaluate the future needs for recycled water treatment facilities in IRWD's service area. This could include significant capital improvements to the existing recycled water plants (Michelson and Los Alisos) or a new plant. The STMP is also examining ways to combine recycled water flows from the two plants into a unified recycled water system. Since recycled water from the Los Alisos plant has higher TDS concentrations than flows from Michelson, this could lead to higher TDS levels in the combined system during some times of the year. Current TDS water quality objectives for the recycled water reservoirs could limit this flexibility and reduce ability of IRWD to maximize water recycling.

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For the reasons listed above, IRWD staff support Issue No. 9 as part of the Draft Priority List for the Basin Plan triennial review. Thank you for consideration of these comments. Please contact the undersigned with any questions regarding this letter.

A handwritten signature in blue ink, appearing to read "Jim Colston", with a long horizontal flourish extending to the right.

Jim Colston
Director of Water Quality and Regulatory Compliance