



## IRVINE RANCH WATER DISTRICT

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July 2, 2015

Via Email: [Wanda.Cross@waterboards.ca.gov](mailto:Wanda.Cross@waterboards.ca.gov)

Ms. Wanda Cross, Senior Environmental Scientist  
California Regional Water Quality Control Board  
Santa Ana Region  
3737 Main Street, Suite 500  
Riverside, CA 92501-3348

### **RE: Draft 2015 Triennial Review Priority List**

Dear Ms. Cross:

The Irvine Ranch Water District (IRWD) appreciates the opportunity for public comment and participation in the development of the Draft 2015 Triennial Review Priority List (Draft List) that will be considered by the Santa Ana Regional Water Quality Board (Regional Board) for adoption. Currently, the 2015 Draft List has several carry order items on it from the previously approved Triennial Review List. IRWD would like to express its continued support to keep, *Issue No. 18 – Consider revision of total dissolved solids objectives for Rattlesnake, Syphon and Sand Canyon reservoirs based on use for storage of recycled water*, on the 2015 Draft List.

IRWD has, and continues to effectively manage the salinity within our service area to meet TDS water quality objectives at the recycled water reservoirs. We are in the process of completing a Salt Management Plan that will identify management strategies, cost estimates for implementing recommended actions and provide recommendations for policies that may be considered to manage recycled water salt concentrations throughout the District under both current and future conditions.

Changing source water conditions, and water conservation practices, can impact the TDS concentrations of the sewage treated at IRWD's Recycled Water Plants. During the ongoing drought, and implementation of mandatory potable water conservation regulations, the ability for IRWD to fully operate and store recycled water, while complying with all regulations and water quality objectives, is critical. Due to current and future conditions that could impact the TDS of IRWD's recycled water and ability to discharge to our reservoirs, IRWD requests that Issue No. 18 remain on the 2015 Draft List. As emphasized by Regional Board staff in the June 19, 2015 Stakeholder meeting, IRWD is aware that issues on the approved Triennial Review List may not necessarily result in an amendment to the Santa Ana River Basin Plan (Basin Plan). Furthermore, IRWD recognizes that we may need to commit our own resources if we wish for this issue to result in an approved amendment to the Basin Plan.

Irvine Ranch Water District appreciates the efforts of the Basin Planning staff to develop the Draft 2015 Triennial Review Priority List, and would like to thank the Regional Board for considering our comments.

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Please do not hesitate to contact me at (949) 453-5325 or Lyndy Lewis at (949) 453-5832 if we can be of assistance to you or your staff.

Sincerely,



Fiona M. Sanchez  
Director of Water Resources