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TAHOE-TRUCKEE SANITATION AGENCY A Public Agency 13720 Butterfield Drive TRUCKEE, CALIFORNIA 96161 (530) 587-2525 • FAX (530) 587-5840 Directors O.R. Butterfield Dale Cox Erik Henrikson S. Lane Lewis Jon Northrop General Manager Marcia A. Beals ***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 NORTH TAHOE • TAHOE CITY • ALPINE SPRINGS • SQUAW VALLEY • TRUCKEE	**TTSA-1**: Project #18, Revise Chapter 3 "means of monthly means", is a moderate priority project for basin planning resources. Staff is not currently working on this project and there are no changes proposed. Though there is not an urgent need to amend the Chapter 3 methodology at this time, permitting and compliance issues may elevate the urgency on this issue. If work on this project becomes a higher priority, then Staff requests assistance from the Tahoe-Truckee Sanitation Agency (TTSA) in evaluating all concerns about possible changes to the methodology, including TTSA's concerns documented in this comment letter. This assistance is requested because of the limited basin planning resources.

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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	

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