

# MONTEREY COUNTY

## DEPARTMENT OF PUBLIC WORKS

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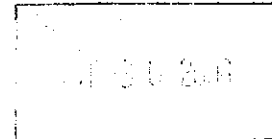
Ronald J. Lundquist, P.E., Public Works Director

October 25, 2006

MR. MATTHEW KEELING  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
MONITORING & REPORTING REVIEW SECTION  
895 AEROVISTA DRIVE SUITE 101  
SAN LUIS OBISPO CA 93941-5414

STATE OF CALIFORNIA  
CENTRAL COAST WATER BOARD

*Received*



895 Aerovista Place, Ste. 101  
San Luis Obispo, CA 93401-7906

**SUBJECT: LAS PALMAS RANCH WATER RECLAMATION PLANT – DRAFT OF  
PRODUCER AND DISTRIBUTOR MASTER RECLAMATION REQUIREMENTS  
ORDER NO. R3-2006-0041**

Dear Mr. Keeling:

Upon reviewing the subject document we have the following comments or requests:

1. We see little point in requiring a Nutrient Monitoring Plan. Irrigation and fertilization of landscaping has been occurring on an ongoing basis, so why require a plan at this point? Submittal of an annual report on nutrient application should be sufficient without adding the additional burden of preparing a plan. At a minimum, please forward to us a copy of a sample Nutrient Management Plan that we can look at to help us understand what such a document would entail.
2. Salt content in the irrigation water is completely a result of processes prior to treated water reaching the distribution system. Therefore, the Supplier should be the entity responsible for the preparation of a Salts Management Plan. It should also be noted that there is in place an Ordinance for CSA 72 – Las Palmas that prohibits the discharge into wastewater collection and treatment system of water that has been treated by use of any water softening system unless such discharge is in conformity with the provisions of Chapter 5 (commencing with section 116775) of part 12 of Division 104 of the Health and Safety Code.
3. Paragraph 29 of the draft WDR requires the development of a set of rules and regulations for recycled water users governing the design, construction and maintenance of recycled water use facilities and the use of recycled water. We think that the requirement in this regard should simply state that recycled water users will stay in compliance with rules that were first put in place when the distribution system was built out. We see little reason to reopen a process in which such rules must be resubmitted to the Department of Health Services and the Regional Board in light of the fact that system construction has been completed and in operation for several years.


Item No. 9 Attachment No. 5  
December 1, 2006 Meeting  
Las Palmas Ranch Development

Matthew Keeling  
October 25, 2006  
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4. Paragraph 33 on page 29 refers to requiring Recycle Water Use contracts prior the transfer of distributor responsibilities from the County to a master Las Palmas Ranch Irrigation Association. We believe that this section should simply state that the County will issue a permit for irrigation discharge to a new Las Palmas Ranch Irrigation Association once such an Association is formed. This Association would have sole distributor responsibility except that the County would continue to be designated in the WDR as responsible for the issuance of such a permit. No other Homeowners Association would assume distributor responsibility, so no Recycle Water Use contracts would be needed as the act of forming the Irrigation Authority would be the sole agreement needed from the Associations.
5. In paragraph 2 on page 23 it states that the "Distributor may add additional use area/Users for the application of disinfected tertiary treated wastewater as long as they meet all applicable requirements contained within this Order and the California Code of Regulations." We believe that a clause should be added stating that the addition of new users and use areas will be limited to circumstances where treated waste water is not being sufficiently disposed of through the Homeowners Associations.
6. In paragraph 14 on page 24 reference is made to a Cross Connection Control Plan. This paragraph should indicate that a Cross Connection Control Plan has been previously submitted to the Regional Water Quality Control Board and approved. Therefore, the only ongoing annual requirement should be to give assurances that no additional connections have been made or to give assurances that such new connections did not result in any cross connections and thus no modifications to the Cross Connection Control Plan.

Thank you for your attention in this matter. Questions or comments can be directed to Edward Muñiz at (831) 755-4878.

Sincerely,

  
**RONALD J. LUNDQUIST, P.E.**  
**PUBLIC WORKS DIRECTOR**

EAM:gt

Master File: CSA 72 - Las Palmas  
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