

Responsiveness Summary – Comments on Santa Clara River Chloride TMDL Reconsideration and Conditional Site Specific Objectives for Chloride

1. Farm Bureau of Ventura County
2. Ventura County Agricultural Water Quality Coalition (VCAWQC)
3. City of Santa Clarita
4. City of Fillmore
5. Warring Water Service (WWS)
6. United Water Conservation District (UWCD)
7. Saticoy Sanitation District (Saticoy)
8. Dwight V. Moore
9. County Sanitation Districts of Los Angeles County (CSDLAC)
10. Camulos Ranch Company (Camulos Ranch)
11. Congressman Elton Gallegly (Gallegly)
12. Newhall Land (Newhall)
13. Castaic Lake Water Agency (CLWA)- Received after due date of November 14, 2008

No.	Author	Date	Comment	Response
1.1	Farm Bureau	11/13/08	As an organization representing the interests of Ventura County’s \$2.1-billion-a-year agricultural industry, the Farm Bureau of Ventura County supports the proposed amendment, which is necessary to allow implementation of the AWRM plan. This innovative plan, developed by stakeholders to address multiple water-supply and water-quality needs throughout the watershed, will make it possible for dischargers to comply with the Upper Santa Clara River chloride TMDL at the most reasonable cost while also providing a host of other important benefits to agricultural interests in our community.	Comment acknowledged.

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No.	Author	Date	Comment	Response
1.2	Farm Bureau	11/13/08	The AWRM, which stakeholders have been developing since Nov. 1, 2007, is a watershed-based approach to managing chloride in Santa Clara River and underlying groundwater basins. We are convinced that the facilities and management strategies described by the plan will fully protect salt-sensitive crops in the lower Santa Clara River Valley, while also improving the quality and reliability of Ventura County’s water supply. That’s why the Farm Bureau, as a founding member of the Ventura County Agricultural Water Quality Coalition, endorsed the Oct. 23 Memorandum of Understanding signed by various stakeholders, specifying the steps that will be taken to implement the AWRM.	Comment acknowledged.
1.3	Farm Bureau	11/13/08	As a committed supporter of the AWRM, the Farm Bureau of Ventura County urges the Regional Board to approve the Basin Plan amendment necessary for the program’s implementation. We commend our fellow stakeholders, particularly the current leadership of the negotiating team for the Santa Clarita Valley Sanitation District of Los Angeles County, for helping make possible this groundbreaking approach to water quality improvement.	Comment acknowledged.
2.1	VCAWQC	11/14/08	The Coalition supports the Regional Board's proposed amendment to the Basin Plan because it provides an opportunity for the implementation of the AWRM Program, an innovative watershed-wide and stakeholder-supported program to comply with the Upper Santa Clara River Chloride TMDL. Since November 1, 2007, the Coalition, as well as various Los Angeles and Ventura County stakeholders within the Santa Clara River	Comment acknowledged.

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			watershed, have worked together to develop the AWRM Program as a viable alternative for Regional Board consideration.	
2.2	VCAWQC	11/14/08	Effective October 23, 2008, the Coalition along with various Los Angeles and Ventura County stakeholders, have entered into a MOU to implement the AWRM Program. The MOU represents the collective commitment of the stakeholders to implement a watershed wide solution to the chloride problem that not only protects all beneficial uses, but provides the most diverse set of water resource benefits to the stakeholders. The Coalition believes that the Regional Board's proposed amendment to the Basin Plan and the resultant chloride site specific objectives necessary to implement the AWRM Program, will allow for the best solution to the Chloride TMDL. Therefore, the Coalition urges the Regional Board to approve this important Basin Plan amendment. The Coalition appreciates your consideration of these comments.	Comment acknowledged.
3.1	City of Santa Clarita	11/14/08	As a participant in the technical working group, the City of Santa Clarita (City) helped formulate the current Chloride TMDL documents. The City supports the proposed amendment to the Basin Plan to reconsider the Upper Santa Clara River's Chloride TMDL and consider conditional Site-Specific Objectives for chloride. The AWRM Program developed by the stakeholders to comply with the TMDL is the best solution for the Santa Clara River Watershed.	Comment acknowledged.
3.2	City of Santa Clarita	11/14/08	The Chloride TMDL effort has taken many years to create. The City has worked with fellow stakeholders over several years to study the issue and develop solutions for the Santa	Comment acknowledged.

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			<p>Clara River Watershed. Stakeholder collaboration, especially recently, has resulted in the option of this TMDL reconsideration. If approved, the conditional SSOs and resultant implementation of the AWRM program will result in more cost-effective and environmentally beneficial compliance with the Chloride TMDL. In addition, Santa Clarita Valley residents have recently passed Measure S, which will require the removal of all automatic water softeners by June 30, 2009. This is a critical element to reduce the contribution of chloride to the river.</p>	
3.3	City of Santa Clarita	11/14/08	<p>The TMDL documents do not appear to address how other minor National Pollutant Discharge Elimination System (NPDES) Permittees, who discharge to Reaches 4B, 5, and 6 of the Santa Clara River, will be handled with respect to the proposed conditional SSOs. This could result in very small contributors having to expend an enormous amount of effort to meet the existing 100 mg/L objective, even while discharging a very small contribution to the river. Respectfully, the City requests the regional water Quality Control Board to clarify how minor NPDES discharges will be handled with regards to the proposed changes.</p>	<p>The language in the Basin Plan amendment has been clarified to indicate how waste load allocations apply to other minor and major NPDES dischargers. Other minor NPDES dischargers (as defined in Table 4-1 of the Basin Plan) receive conditional wasteload allocations (WLAs). Other major NPDES discharges (as defined in Table 4-1 of the Basin Plan) receive WLAs equal to 100 mg/L. The Regional Board may consider assigning conditional WLAs to other major dischargers based on an analysis of the downstream increase in net chloride loading to surface water and groundwater as a result of implementation of conditional</p>

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				WLA's. In addition, language has been added to the staff report clarifying this issue.
3.4	City of Santa Clarita	11/14/08	In closing, the City supports the proposed conditional SSOs and the implementation of the AWRM Program to manage chloride levels in the Santa Clara River Watershed. We appreciate the time, commitment, and willingness of staff to consider the proposed alternative for the Watershed.	Comment acknowledged.
4.1	City of Fillmore	11/12/08	The AWRM program proposes to blend Reverse Osmosis treated wastewater with groundwater in the east Piru basin and discharge the blend at a chloride concentration not more than 95 mg/L upstream of the Fillmore basin. The City is concerned that the combination of this discharge and the background river water quality, even though this combination may meet chloride objectives in the river, may impact groundwater quality in the Fillmore basin. The surface flows to the Santa Clara River from the new AWRM discharge point into Reach 4A would likely percolate into the Fillmore basin, and at a quality of 95 mg/L chloride, would be above ambient chloride levels in the groundwater in the Fillmore basin. United Water has measured the surface flows through Fillmore and found that even in the wettest years when the basin is near-full a portion of the surface water percolates into the Fillmore basin. So trapping of higher chloride water could be continuous.	The USCR chloride TMDL and AWRM maintains the surface water and groundwater objectives in Reach 4A and the Fillmore Basin. The present chloride loading into the Fillmore Basin will be analyzed as part of the MOU between stakeholders. However, staff notes that the net effect of the AWRM is to remove salts from the USCR which currently are transported downstream through surface and groundwater flow. Any chloride that is introduced downstream as part of the AWRM are accompanied by additional water to increase the assimilative capacity of both surface and groundwater basins. The extent of any potential degradation needs to be further assessed through an evaluation of hydrology and the

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				<p>amount of surface water recharge that occurs in Reach 4A and downstream. The AWRM memorandum of understanding (MOU) will implement an extension of the Groundwater and Surface Water Interaction (GSWI) model to assess the groundwater and surface water interactions and impacts to surface water and groundwater quality from the AWRM program to the Fillmore and Santa Paula basins. If the extended GSWI model results indicate the blended extraction well and Reverse Osmosis (RO) permeate discharge as currently proposed by the AWRM option would cause an exceedance of water quality objectives, the GSWI model will be used to determine the level of chloride in the blended extraction well and RO permeate discharge necessary to preclude such an exceedance.</p> <p>Chloride trend monitoring will be conducted in these groundwater basins. This TMDL shall be reconsidered by the Regional Board</p>

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				if chloride trend monitoring indicates degradation of groundwater or surface water due to implementation of compliance measures.
4.2	City of Fillmore	11/12/08	<p>This may affect Fillmore in two ways.</p> <p>-First, will our potable water wells draw in Santa Clara River ground water during extended drought years? Will the elevated chloride levels cause Fillmore recycled water discharges to exceed our chloride limit of 100 mg/L after normal human use? A study needs to be performed to quantify the chloride changes downstream, short and long term.</p>	<p>Staff notes that the potential increases in chloride concentrations in the Fillmore Basin could impact the levels of chloride in Fillmore treatment plant effluent discharged to Reach 3. Staff agrees that likely an antidegradation analysis will be required during the permitting stage for the discharge to Reach 4A. The permit will require further evaluation of this discharge and any impacts on downstream uses, groundwater and surface water monitoring, and enforceable effluent limits. An initial antidegradation analysis is presented in the staff report.</p> <p>Also see response to comment #4.1.</p>
4.3	City of Fillmore	11/14/08	<p>-Second, a possible future project for the City is to construct a domestic water softening plant and new water wells south of Hwy 126 using Santa Clara River ground water instead of existing wells to the north. The Santa Clara River groundwater currently has acceptable historic chloride levels but will they be too high in the future if</p>	<p>Comment noted. Any potential effects of the AWRM on Fillmore wastewater will be analyzed through extension of the GWSI model and monitored through trend monitoring. Regional Board supports City of</p>

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			higher chloride levels are permitted upstream? In order to use a ground water source it must have chloride levels less than 60 mg/L for Fillmore to meet the 100 mg/L chloride objective after normal human use.	Fillmore to reduce salt loading to the Santa Clara River through reduction of SRWS. See response to comment #4.2.
4.4	City of Fillmore	11/14/08	Currently the average chloride level in our effluent is 137 mg/L, down from 144 mg/L in 2004 because we have been working to eliminate brine discharging water softeners. We expect that when all of the brine discharging water softeners are eliminated our effluent will be at 94 mg/L even in drought years when our source water chlorides are 60 mg/L. However if our source water chlorides are increased because of the proposed operation of the AWRM Program, will we be out of compliance?	Comment noted. See response to comment #4.2.
4.5	City of Fillmore	11/14/08	Higher ground water in the Fillmore Basin will reduce percolation rates on the treated water disposal system in Fillmore, especially in wet years. This could add operating costs to already stressed Fillmore Sewer rate payers. The AWRM program should not add costs to the operating costs of the Fillmore sewer system. Also the higher ground water may exacerbate other high ground water issues in the basin which should be studied so their impact is known.	The Regional Board may require an antidegradation analysis during the permitting stage for the discharge to Reach 4A. The permit will require further evaluation of this discharge and any impacts on downstream uses, groundwater and surface water monitoring, and enforceable effluent limits. An initial antidegradation analysis is presented in the Staff Report. The Staff Report finds that the important social and economic benefits of the AWRM Program could warrant some degradation of the downstream reaches.
4.6	City of	11/14/08	The City of Fillmore supports the Site Specific Objective	Comment noted. See response to

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	Fillmore		with the assurance that it will not cause degradation of our water quality or high ground water concerns. We would like assurances that the Ground Water Surface Water Interaction model will be extended downstream from Hwy 23 to the Freeman Diversion. And that impacts to water quality and high ground water are addressed and mitigated.	Comments #4.1, #4.2, and #4.5.
5.1	WWS	11/14/08	Warring Water Service, Inc. is the local water purveyor for the town of Piru, California. We provide both domestic water service to the town and irrigation to some of the local farmers. It has come to our attention that the proposed Site Specific Objectives for the Upper Santa Clara River Chloride TMDL will include multiple ground water wells located east of Piru Creek. It is our understanding that there may be as many as ten wells each pumping up to 2,000 gpm as part of this plan. The water Company's concern is how this may impact the quantity and quality of our water supply. Our sole source of water supply is ground water from the Piru Basin. Any additional costs incurred by the Water Company, due to increased pumping or treatment costs, will be passed on to our customers. Any increased cost would be a financial hardship to our rate payers. We ask that you please consider these concerns as you make any decisions regarding this issue	As part of TMDL development, the United Water Conservation District (UWCD) analyzed the change in groundwater elevations caused by various implementing alternatives, including (1) the construction of a large RO treatment facility and brine disposal via an ocean outfall and (2) the AWRM program. This analysis is presented in the Staff Report. To analyze this, the results of groundwater elevations from the GSWI model were plotted to indicate the potential changes in elevations during a variety of climatic conditions. UWCD found that the Piru well field would operate within historic drawdown ranges under the AWRM program. In addition, the drawdown from the AWRM program would be less than the drawdown from the “RO to the Ocean” option.

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6.1	UWCD	11/14/08	United endorses the proposed Alternative Water Resource Management (AWRM) alternative as a creative solution to mitigate and eventually reduce the chloride loading to groundwater in Reaches 4 and 5 of the Santa Clara River.	Comment acknowledged.
6.2	UWCD	11/14/08	United has been an active participant in Regional Board’s efforts over the past decade to develop an acceptable chloride TMDL for the upper Santa Clara River. Until recently, this process was often contentious. Over the past year the AWRM proposal has evolved to the point that it is the favored alternative for a number of stakeholders in the Santa Clara River valley. United would like to thank and commend the Regional Board and staff from the Sanitation Districts of Los Angeles County for sponsoring and funding the collaborative stakeholder process and technical studies that allowed the development and assessment of various TMDL scenarios. The successful development of a calibrated groundwater-surface water interaction model (GSWIM) for reaches 4, 5 and 6 was a key tool that allowed assessments of innovative solutions such as the AWRM.	Comment acknowledged.
6.3	UWCD	11/14/08	As a signee of a Memorandum of Understanding for the implementation of the AWRM program, United demonstrates its commitment to support the ongoing effort required to successfully implement the program. United will support the extension of solute transport modeling downstream to the Freeman Diversion, which will allow a more accurate assessment of potential water level and water quality impacts to the Fillmore and Santa Paula	Comment acknowledged.

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			groundwater basins that underlie Reach 3 of the Santa Clara River. United is also working with Camulos Ranch to determine what operational arrangements might minimize impacts to farming operations along Reach 4B during the construction and long-term operation of the proposed AWRM well field located north of the Santa Clara River and east of Piru Creek.	
6.4	UWCD	11/14/08	As a signee of a Memorandum of Understanding for the implementation of the AWRM program, United demonstrates its commitment to support the ongoing effort required to successfully implement the program. United will support the extension of solute transport modeling downstream to the Freeman Diversion, which will allow a more accurate assessment of potential water level and water quality impacts to the Fillmore and Santa Paula groundwater basins that underlie Reach 3 of the Santa Clara River. United is also working with Camulos Ranch to determine what operational arrangements might minimize impacts to farming operations along Reach 4B during the construction and long-term operation of the proposed AWRM well field located north of the Santa Clara River and east of Piru Creek.	Comment acknowledged.
6.5	UWCD	11/14/08	United agrees with Regional Board language in Section 8.5 of the Staff Report stating that the potential for water quality degradation in Reaches 3 and 4A needs to be further evaluated prior to the completion of this chloride TMDL. United thinks that water quality impacts to these reaches will be relatively minor, but a more detailed assessment of the potential impacts to downstream water	Comment acknowledged.

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			users is required to ease remaining concerns among some Ventura County interests. United is also interested in discussing the potential (trend) monitoring locations discussed in Section 8.7 with Regional Board staff. Should the AWRM alternative be approved by the Regional Board, appropriate monitoring should be established well in advance of the operation of the program.	
6.6	UWCD	11/14/08	United requests time at the Regional Board hearing on December 11 to present model results detailing the water supply and water quality impacts of the AWRM program in Ventura County. The presentation will require approximately 15 minutes.	Staff will contact United prior to the Board meeting to allow an appropriate amount of time for the presentation.
7.1	Saticoy Sanitary District	11/14/08	A preliminary report "Chemically treated saline wastewater disposal by reuse of recycled effluent for irrigating crops" was provided for the July 2008 workshop held in Fillmore. The attached draft article summarizes the final results. "Agronomic Interpretation of the Wastewater Irrigation and Avocado Seedling Growth and the Saticoy - Jose Flores Treatment Facility in the spring and summer of 2008" by Thomas A. Ruehr explains Avocado seedling growing as well as the control group. The control group was irrigated with water containing about 60 mg/L of Chloride and 1,500 mg/L total dissolved solids (TDS). The test group was irrigated with water containing nearly 120 mg/L of Chloride and 2,300 - 2,900 mg/L of TDS. Considering our need to adapt to decreasing local rainfall due to Climate Change, the Santa Clara River Chloride TMDL should consider the availability of technology	Staff reviewed the cited report and determined that it supports the TMDL work in determining a chloride range appropriate for irrigation of salt sensitive crops and that this article does not justify a change to the proposed numeric target for salt sensitive crops. The numeric target of 117 mg/L for salt sensitive crops is based on results of Literature Review Evaluation (LRE). The LRE reviewed more than 200 technical articles and was reviewed by an independent Technical Advisory Panel (TAP).

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			<p>which appears to produce the same crop yields even with higher chloride concentrations. This kind of technology will allow more reuse of wastewater and other saline waters.</p> <p>Please contact me at 805-512-1363 or kellymmid@aol.com for questions or clarifications.</p>	
8.1	Dwight V. Moore	11/14/08	<p>The proposed Alternative Water Resources Management Plan (AWRM) is ill-conceived. Its only merit is that it doesn't preclude conversion to a brine line, the only real long term solution to chloride problems on the Santa Clara River.</p>	<p>The staff report analyzed the alternatives and found that the AWRM program will result in decreased salt loading to the Upper Santa Clara River (USCR) with fewer environmental and economic impacts than the other Alternatives. Additional benefits in both water supply and water quality accrue in areas downstream of the USCR and in the neighboring Oxnard Plain.</p>
8.2	Dwight V. Moore	11/14/08	<p>With State Water Project water becoming increasingly problematic it makes little sense for Los Angeles Sanitation to reverse osmosis (RO) a portion of their effluent and then mix it with poorer quality water from the Piru Basin and dump the degraded water at Fillmore further exacerbating the chloride levels there.</p> <p>It is wrong to attempt to ameliorate the worsening chloride situation in the Upper Piru Basin by degrading the surface water in the Santa Clara River at Fillmore. When chlorides in the surface water are 60 ppm or less,</p>	<p>See response to comment #4.1.</p>

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			<p>the dumping of the blended RO water at 95 ppm represents a substantial degradation of the surface water.</p>	
8.3	Dwight V. Moore	11/14/08	<p>It is ironic that LA Sanitation is to be permitted to discharge waters to the Santa Clara River with chlorides in excess of 100 ppm while an effort is being made to reduce chlorides in the groundwater of the Piru Basin.</p> <p>There is yet another unintended consequence of the dumping of the blended RO water at Fillmore and that is the lengthening of the period of high groundwater at Fillmore. Currently with the annual discharge from Lake Piru by the United Water Conservation District that begins after Labor Day percolation in the ponds at the City of Fillmore Wastewater Treatment Plant all but ceases and it is necessary to discharge Fillmore's effluent to the Santa Clara River. With the AWRM will this now be a year around problem and will the problem transfer to the new plant under construction?</p> <p>Piru, Fillmore, Santa Paula, & Ventura have their own chloride problems in their treated effluent. It is time to step back and consider a regional approach which would consist of a brine line serving all communities on the Santa Clara River.</p>	<p>See response to comment #8.1. Staff finds that the AWRM compliance alternative will result in timely attainment of conditional SSOs and reduce the chloride load to the USCR and underlying groundwater basins during the TMDL implementation period. The effects on downstream groundwater quality will be monitored as part of the TMDL implementation plan.</p> <p>Staff further notes that the net effect of the AWRM is to remove salts from the Santa Clara River.</p>
8.4	Dwight V. Moore	11/14/08	<p>There is yet another unintended consequence of the dumping of the blended RO water at Fillmore and that is the lengthening of the period of high groundwater at Fillmore. Currently with the annual discharge from Lake</p>	<p>See response to comment #4.1.</p>

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			Piru by the United Water Conservation District that begins after Labor Day percolation in the ponds at the City of Fillmore Wastewater Treatment Plant all but ceases and it is necessary to discharge Fillmore's effluent to the Santa Clara River. With the AWRM will this now be a year around problem and will the problem transfer to the new plant under construction?	
8.5	Dwight V. Moore	11/14/08	Piru, Fillmore, Santa Paula, & Ventura have their own chloride problems in their treated effluent. It is time to step back and consider a regional approach which would consist of a brine line serving all communities on the Santa Clara River.	See response to comments #4.1 and # 8.1.
9.1	CSDLAC	11/14/08	The Sanitation District strongly supports the proposed amendment to the Basin Plan because it provides an opportunity for the implementation of the Alternative Water Resources Management (AWRM) Program, an innovative watershed-wide and stakeholder-supported program to comply with the Upper Santa Clara River Chloride TMDL. Since November 1, 2007, various Los Angeles and Ventura County stakeholders within the Santa Clara River watershed, including the Sanitation District, have worked together to develop the AWRM Program as a viable alternative for Regional Board consideration. The AWRM Program is a watershed-based approach to manage chloride in Santa Clara River and underlying groundwater basins and involves: (1) reducing chloride levels in recycled water through automatic water softener removals and conversion to ultraviolet light disinfection processes; (2) smallscale advanced treatment	Comment acknowledged.

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			<p>of wastewater with local brine disposal; (3) supplemental water to reduce chloride levels in the river; (4) alternative water supplies to protect salt-sensitive agriculture, when necessary; and (5) facilities to remove high chloride groundwater in Ventura County from the watershed. The stakeholders have entered into a Memorandum of Understanding (MOU) for the Implementation of the AWRM Program. This MOU, effective October 23, 2008, is submitted for inclusion in the administrative record as Attachment A. The MOU represents the collective commitment of the stakeholders to implement a watershed-wide solution to the chloride problem that not only protects all beneficial uses, but provides the most diverse set of water resource benefits for the watershed.</p>	
9.2	CSDLAC	11/14/08	<p>Among the key elements of the AWRM Program MOU is a commitment by the Sanitation District to implement source control measures to reduce chloride in recycled water at the Saugus and Valencia WRPs. The Sanitation District has already made significant progress on source control measures through the adoption of the Santa Clara River Chloride Reduction Ordinance of 2008, which requires the removal of all automatic water softeners, from the Sanitation District's service area by June 30, 2009. In accordance with California Health and Safety Code Section 116787, the ordinance was approved by a majority of voters in the November 4, 2008 General Election, and will become effective on January 1, 2009. A copy of the ordinance is included as Attachment B.</p>	Comment acknowledged.
9.3	CSDLAC	11/14/08	In addition, the AWRM Program MOU specifies a	Comment acknowledged.

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			<p>commitment by both the Sanitation District and the United Water Conservation District (United Water) to jointly fund an extension of the Groundwater-Surface Water Interaction Model (GSWIM) to the Freeman Diversion. The GSWIM extension will be able to better address potential Water level and water quality concerns raised by the City of Fillmore, inform decisions regarding the future operation of the AWRM Program extraction wells discharging to Reach 4A, and also identify mitigation measures that may be required of the Reach 4A discharge permittee to assure that the operation of the AWRM Program extraction wells protects downstream beneficial uses.</p>	
9.4	CSDLAC	11/14/08	<p>Both the Sanitation District and United Water are also working with the Camulos Ranch to address their potential concerns related to water levels and interim/future water quality in East Piru, associated with AWRM Program. Future agreements related to the operation of AWRM Program extraction wells and the provision for an alternative water supply of suitable quality, will have to be developed between the Sanitation District, United Water and the Camulos Ranch to implement the AWRM Program and assure that the AWRM facilities are operated in a manner that does not impair the Ranch's beneficial uses.</p>	Comment acknowledged.
9.5	CSDLAC	11/14/08	<p>Attachment C is comprised of copies of the Staff Report, Tentative Resolution, and Attachments to the Tentative Resolution, which include recommended edits proposed by both Regional Board and Sanitation District staff.</p> <p>Comments on the Staff Report include recommendations</p>	Comment addressed. Staff agrees that the proposed changes clarify the TMDL and has revised the Staff Report, Tentative Resolution, and attachments accordingly.

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			on the appropriate compliance period to assess the cumulative net chloride loading above 117 mg/l trigger for the Reach 4B critical condition SSO (Section 4.1.b.3, and Section 4.2.a.3).	
9.6	CSDLAC	11/14/08	Comments on the Staff Report: Clarifications related to future projected growth and WRP flows and how that was modeled by GSWIM and how they affect the anti-degradation analysis discussion. (Sections 2.6, Section 3.5, Section 6, and Section 7.3).	Comment addressed. Staff revised the Staff Report accordingly.
9.7	CSDLAC	11/14/08	Comments on the Staff Report: Clarifications on the typical operational modes of the AWRM Program (Section 4 and Figure 3).	Comment addressed. Staff revised the Staff Report accordingly.
9.8	CSDLAC	11/14/08	Comments on the Staff Report: Clarifications on "rated capacity" versus capacity factor as it relates to the operation of RO membranes (see Section 4.2, Table 8, and Section 8.0).	Comment addressed. Staff revised the Staff Report accordingly.
9.9	CSDLAC	11/14/08	Comments on the Staff Report: Recommendation to include an annual average conditional SSO for groundwater in the Castaic Valley area, to be consistent with similar averaging periods recommended for groundwater in the Santa Clara - Bouquet & San Francisquito Canyons and Lower areas East of Piru Creek.	Comment addressed. Staff revised the Staff Report accordingly.
9.10	CSDLAC	11/14/08	Comments on the Staff Report: Clarifications on compliance costs presented in Sections 5.4.1 and 5.4.2, and	Comment addressed. Staff revised the Staff Report accordingly.

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			in Table 1 1 and various minor editorial comments.	
9.11	CSDLAC	11/14/08	Comments on the Tentative Resolution and Attachments: Recommendations on the appropriate compliance period to assess the cumulative net chloride loading above 117 mg/L trigger for the Reach 4B critical condition SSO.	Comment addressed. Staff revised the Tentative Resolution and Attachments accordingly.
9.12	CSDLAC	11/14/08	Comments on the Tentative Resolution and Attachments: Clarifications on "rated capacity" versus capacity factor as it relates to the operation of RO membranes.	Comment addressed. Staff revised the Tentative Resolution and Attachments accordingly.
9.13	CSDLAC	11/14/08	Comments on the Tentative Resolution and Attachments: Recommendation to include an annual average conditional SSO for groundwater in the Castaic Valley area, to be consistent with similar averaging periods recommended for groundwater in the Santa Clara - Bouquet & San Francisquito Canyons and Lower areas East of Piru Creek.	Comment addressed. Staff revised the Tentative Resolution and Attachments accordingly.
9.14	CSDLAC	11/14/08	Comments on the Tentative Resolution and Attachments: Recommendation to include language in the Tentative Resolution acknowledging that the required TMDL studies for TMDL Tasks 4, 5, 6, 7, 8, 9, 10b and 10c have been completed.	Comment addressed. Staff revised the Tentative Resolution and Attachments accordingly.
9.15	CSDLAC	11/14/08	Comments on the Tentative Resolution and Attachments: Clarifying language in the Tentative Resolution that effective October 23, 2008, Los Angeles and Ventura County stakeholders have entered into a MOU to implement the AWRM Program.	Comment addressed. Staff revised the Tentative Resolution and Attachments accordingly.
9.16	CSDLAC	11/14/08	Comments on the Tentative Resolution and Attachments: Clarifying language related to the implementation and schedules for required groundwater and surface water trend monitoring by the Sanitation District and the future Reach	Comment addressed. Staff revised the Tentative Resolution and Attachments accordingly.

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			4A Permittee.	
9.17	CSDLAC	11/14/08	Comments on the Tentative Resolution and Attachments: Various minor editorial comments.	Comment addressed. Staff revised the Tentative Resolution and Attachments accordingly.
9.18	CSDLAC	11/14/08	In closing, the Sanitation District would like to reiterate its strong support for the Regional Board staff's recommendation to adopt conditional SSOs for chloride and urges the Regional Board to approve this important Basin Plan amendment. The Sanitation District believes that the proposed amendment to the Basin Plan and the resultant chloride SSOs necessary to implement the AWRM Program, will provide an opportunity to implement a solution to the Chloride TMDL that provides the maximum benefit to the people of the State. The Sanitation District would like to commend the Regional Board staff for their dedication and support during the TMDL collaborative process studies, which have been instrumental in the development of the stakeholder consensus solution to the Chloride TMDL for the regional Board's consideration.	Comment acknowledged.
10.1	Camulos Ranch	11/14/08	1) How does the proposed AWRM supply enough high quality water that continues to meet our historic, present, and future beneficial uses for all of our agricultural needs including all crops grown on Camulos Ranch? What can be done now to mitigate the ongoing impairment of our well and surface waters, which has and continues to reduce yields, production quality, and overall health of plants, trees, and soils through chloride loading and not just to strawberries and avocados produced on Camulos? This	The conditional SSOs only apply if the AWRM program is operated and Camulos Ranch receives supplemental water during periods of drought. If these conditions are not met, existing water quality objectives for chloride of 100 mg/L apply. The proposed conditional SSOs, WLAs, and TMDL

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			<p>issue has again been scientifically documented from the most recent sampling conducted by the LACSD laboratory on November 10, 2008. Our irrigation wells had chloride levels of 121, 125, 127, 130, 139, and 152 mg/L respectively and the surface water was 128 mg/L. A soil analysis performed by Fruit Growers Laboratory on October 28, 2008 showed very high chloride levels in a field with a cover crop in preparation for an organic mixed vegetable planting.</p>	<p>implementation plan will export salts from the watershed and protect beneficial uses, accounting for seasonal variations and a margin of safety. The proposed revisions to the TMDL implementation plan accelerated the schedule by one year from 11 years to 10 years, so that impairments will be addressed sooner than previously considered.</p>
10.2	Camulos Ranch	11/14/08	<p>There seems to be an assumption that is based upon the “Literature Review and Evaluation” (LRE) and the technical advisory panel (TAP) findings that a 3-month averaging period range of chlorides of between 100 to 117 or 120 mg/L would be protective of avocados. We do not entirely agree with those numbers. There isn’t a lot of “peer” review regarding strawberry production in the Piru area but from our real life growing experience, the maximum chloride limit for irrigation would be 100 mg/L. Do the studies address the time of year that the averaging is most likely to occur? Did the studies address that the micro-climate and evapo-transpiration rates in Piru, 30 miles inland from the coast, are completely different from the coastal regions of Ventura, Santa Paula and even Fillmore? Of course, Camulos Ranch operations would be directly impacted in Reach 4B by the proposed amended chloride TMDL from 100 to 117 mg/L.</p>	<p>The LRE developed a chloride threshold for the reasonable protection of salt-sensitive agriculture. The LRE considered additional effects of all mineral conditions, irrigation practices, and environmental factors such as drought in establishing the LRE guideline. The LRE reviewed approximately 200 technical articles on the chloride and salinity sensitivities of avocado, strawberry and nursery plants. The LRE concluded that a conservative guideline concentration for chloride hazard is 100-117 mg/L. The LRE was reviewed by an independent TAP and the majority TAP opinion concurred with the 100 –117 mg/L</p>

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				guideline concentration range.
10.3	Camulos Ranch	11/14/08	Does it make sense to increase the chloride SSO's for surface water discharges in Reach 4B from 117 to 130 mg/l during critical conditions? The other farming operations and cities downstream in the other reaches continue to irrigate all of their crops or pump municipal water with Chloride levels well below 100 mg/L. They enjoy blending provided by Piru Creek, Hopper Creek, Sespe Creek, Santa Paula Creek, etc... Camulos doesn't have that option and appears to be bearing the burden alone when it didn't create the problem.	The proposed amendment requires the Santa Clarita Valley Sanitation District (SCVSD) to provide supplemental water to salt-sensitive agricultural uses that are irrigated with surface water during periods when Reach 4B surface water exceeds 117 mg/L. In addition, SCVSD is required to reduce the net mass chloride loading to the Piru Basin over time.
10.4	Camulos Ranch	11/14/08	2) How would the proposed East Piru Well Field, as part of the AWRM, impact our on-going operations? We are concerned that there aren't enough details and information to explain how the proposed Well Field, which is conceptually designed to export 12,000 to 16,000 acre feet of water from under Camulos Ranch would operate.	As stated in UWCD's comment letter, construction and operation of the proposed East Piru Well Field can be managed to minimize impacts to on-going farming operations. The Regional Board may consider imposing flow restrictions on the forthcoming permit for discharge of extracted groundwater in Reach 4A.
10.5	Camulos Ranch	11/14/08	Also, how would the Piru basin pumping levels and subsequent draw down affect Camulos Ranch's continuing operations, which would be competing directly with the new AWRM's proposed well field objectives. We are concerned that Camulos must make its decisions based on	See response to comments #5.1. Operation of the extraction wells in the Piru basin can be arranged in a manner that will not affect Camulos Ranch's continuing operations. The

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			computer modeling, which assumes that historic rainfall will be a reliable enough predictor of future precipitation that will determine future river flows and a potential Piru basin recharge. We cannot and will not stake the future of our company on computer models based on assumptions that both well fields could operate independently at the same time effectively and efficiently meeting each other’s objectives.	Regional Board may consider imposing flow restrictions on the forthcoming permit for discharge of extracted groundwater in Reach 4A.
10.6	Camulos Ranch	11/14/08	In order to address Camulos Ranch’s major questions and concerns, we have decided that the proposed AWRM East Basin Well Field will most likely require a joint operation managed by Camulos Ranch Company and UWCD. LACSD RO permeate water will be delivered to the proposed well field. There it will be blended and provide water to both Camulos Ranch and to UWCD. Camulos Ranch and UWCD will oversee the mitigation of chloride loading in the Piru Basin by moving any additional water downstream. The basin pumping levels must be monitored to guarantee that optimum conditions warrant the extraction and movement of blended water downstream.	Comment acknowledged.
10.7	Camulos Ranch	11/14/08	We have discussed the need to begin immediate mitigation of chlorides levels in Camulos water sources. Some possible solutions could be drilling two new wells as prototypes along Piru Creek. Water from these wells should contain lower chloride levels that could be blended with existing Camulos water sources. Another possible solution is that Piru Creek or Castaic Creek surface waters could perhaps be used temporarily to begin blending and applied	Comment acknowledged.

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10.8	Camulos Ranch	11/14/08	<p>to Camulos fields.</p> <p>It will be this spirit of cooperation and creativity that will help resolve both the short term degradation and impairment of Camulos Ranch’s surface and ground water needs. This will help restore and clean up the years of accumulated salt buildup in our soils as well as the Piru basin. The proposed AWRM resolution does not adequately recognize the need for current mitigation. The AWRM implementation schedule is designed to be constructed over a number of years. How will approval of the proposed SSO’s provide current mitigation and remediation from past and present chloride damage? The current chloride values in our wells this week demonstrate the urgency of some action. Water is a precious resource and the beneficial use of this resource needs to be available to us not only in the future, but now!</p>	<p>The proposed amendment assigned interim WLAs for TDS and sulfate to facilitate earlier discharge of supplemental water to Reach 6, which may help resolve the short term degradation and impairment of surface water and groundwater.</p>
10.9	Camulos Ranch	11/14/08	<p>The AWRM MOU and subsequent agreements between Camulos Ranch Company, LACSD, and UWCD, will be conditional upon meeting Camulos Ranch’s site specific needs. Camulos is supportive of the AWRM resolution but feels much more work and detail needs to be completed to alleviate our concerns. All agreements must acknowledge our historic rights and ongoing rights to access beneficial use surface waters of the Santa Clara River and Piru basin ground waters that have been utilized since Camulos was first created as a Spanish Land Grant in 1839. This is a critical, fundamental point that needs to be understood and recognized by all stakeholders so that the process can move forward to an amenable resolution.</p>	<p>Comment acknowledged.</p>

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10.10	Camulos Ranch	11/14/08	The Camulos Ranch Company would like to publicly acknowledge Phil Friess and Brian Louie of LACSD, Dr. Steve Bachman and Michael Solomon with UWCD and Rob Roy for their continued efforts to make the AWRM succeed.	Comment acknowledged.
11.1	Congressman Elton Gallegly	11/14/08	I am writing with regard to the proposed amendment to the Water Quality Control Plan for the Los Angeles Region (Basin Plan). The main purpose of the amendment is to reconsider the Upper Santa Clara River Chloride TMDL As the member of Congress representing most of Ventura County, I believe that the proposed amendment to the Basin Plan will be greatly beneficial to the agricultural community in Santa Clara River watershed.	Comment acknowledged.
11.2	Congressman Elton Gallegly	11/14/08	The amendment proposed by the Los Angeles Regional Water Quality Control Board (Regional Board) represents a consensus of the major stakeholders impacted by Upper Santa Clara River Chloride TMDL. Importantly, the proposed amendment is a regional, watershed based approach to managing chloride levels in the Santa Clara River and groundwater basins.	Comment acknowledged.
11.3	Congressman Elton Gallegly	11/14/08	For Ventura County growers, the plan will increase the amount of water available for irrigation, reduce the chloride levels in the East Pint groundwater basin, and ensure protection for salt-sensitive crops along the Santa Clara River in Ventura County, On the other hand, if the proposed amendment is not adopted, the agricultural industry in Ventura County will not only have to contend with lower quality water, it will also face higher water rates due to the high cost of finding replacement supplies to	Comment acknowledged.

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			compensate for the decrease in water in the Santa Clara River.	
12.1	Newhall Land	11/14/08	<p>The Basin Plan-Amendments, Site Specific Objectives and chloride TMDL revision incorporate the Alternative. Water Resources Management (AWRM) scenario that was _ developed based on input, and consensus from multiple stakeholders/agencies. Based on analyses presented to the chloride TMDL Technical Working Group (TWG), it will result in an improvement to surface and groundwater quality, protect receiving water beneficial uses, and augment water resource supplies in Ventura County.</p> <p>Newhall is pleased with the stakeholder approach used to develop the SSOs, and supports the recommendation of Board staff to adjust the objectives accordingly, as written in the proposed draft SSO BPA.</p>	Comment acknowledged.
12.2	Newhall Land	11/14/08	<p>At the bottom of the WLA section on page 8 of the TMDL BPA, it states: "Other existing NPDES discharges contribute a minor chloride load. The conditional WLA for these point sources is as follows" and the conditional WLA table that follows states that existing NPDES discharges: to; Reach 5 will have_a concentration-based conditional WLA: equal to the proposed SSO, or 150 mg/L as a rolling 12-month average. In order.to be consistent with this language, Newhall requests that the TMDL implementation language on the top of page 11 under "<u>Newhall Ranch, WRP</u>" be,clarified as follows: Remove the existing Newhall Ranch WRP language in the</p>	<p>Staff revised the BPA and the staff report to clarify WLAs for minor and major NPDES dischargers. Newhall WRP is defined as a major discharger.</p> <p>The effect of assigning conditional WLAs to the Newhall WRP on net chloride loading was not modeled by GSWI. Analysis of the protectiveness of Newhall Ranch WRP discharge at 150 mg/L to</p>

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			<p>implementation section on the top of page 11: "The Regional Board may consider assigning conditional WLAs for the Newhall Ranch WRP pending implementation of a chloride mass removal quantity that is proportional to mass based chloride removal required for the Valencia WRP." And replace with the following: "The Newhall Ranch WRP is an existing NPDES permittee in Reach 5. The Regional Board may revise the Newhall Ranch WRP NPDES permit to include the final conditional WLA for "other NPDES discharges" to Reach 5 as an effluent limit. This revision would be based on the results of an analysis to evaluate the downstream impact on chloride loadings from this permit limit adjustment." This suggested clarification to the language would be consistent with the chloride effluent limit reopener language that is currently included in footnote 2 of Table 6 (Effluent Limitations) on page 15 of the Newhall Ranch WRP NPDES permit (Order No. R4-2007-0046). That language is included here for reference: "However, if a chloride site specific objective (Chloride SSO) is adopted for the reach of the Santa Clara River in which Newhall Ranch WRP will discharge, then the permit may be reopened to make the necessary changes to this permit, following USEPA approval of the Chloride SSO." This conditional WLA for the Newhall Ranch WRP is equivalent to the final conditional WLAs that are included for the Valencia and Saugus WRPs. If needed to support</p>	<p>downstream water quality cannot be conducted absent results from the model. Furthermore, new dischargers from a new facility are generally required to attain existing water quality standards (i.e. 100 mg/L chloride) under NPDES permitting schemes. Therefore, the Newhall WRP received a WLA equal to 100 mg/L. The data provided in the comment letter are not sufficient for staff to recommend consideration of applying a conditional WLA at this time. The Regional Board may consider assigning a conditional WLA to Newhall WRP based on removal of a mass-based quantity of chloride that is proportional to mass based chloride removal required for the Valencia WRP.</p>

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			<p>this new conditional WLA, the staff report should include an analysis of the Newhall Ranch WRP discharge at 150 mg/L, assuming AWRM implementation, to evaluate the protectiveness of this condition to downstream water quality. To support this analysis, an assessment of additional load due to the Newhall Ranch WRP is provided in the table below. Based on this comparison, the additional load from the Newhall Ranch WRP to the Santa Clara River (SCR) at the County line is minor. Given the relatively low flowrate and timing (i.e., wet season only, when instream flows are greatest) of discharge from the Newhall Ranch WRP, this new point source is not expected to significantly impact downstream receiving water chloride concentrations.</p>	
13.1	Castaic Lake Water Agency	11/18/08	<p>CLWA and SCWD support the Regional Board's proposed amendment to the Basin Plan because it provides an opportunity for the implementation of the Alternative Water Resources Management (AWRM) Program, an innovative watershed-wide and stakeholder-supported program to comply with the Upper Santa Clara River Chloride TMDL. Since November 1, 2007, various Los Angeles and Ventura County stakeholders within the Santa Clara River watershed, including CLWA and SCWD, have worked together to develop the AWRM Program as a viable alternative for Regional Board consideration. The AWRM Program is a watershed-based approach to manage chloride in Santa Clara River and underlying groundwater basins and involves (1) reducing chloride levels in recycled water through automatic water softener removals and conversion to ultraviolet light</p>	Comment acknowledged.

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			<p>disinfection processes, (2) small scale advanced treatment of wastewater with local brine disposal, (3) using supplemental water to reduce chloride levels in the river, (4) providing alternative water supplies to protect salt-sensitive agriculture; when necessary, and (5) implementing facilities to remove high chloride groundwater from the watershed Ventura County.</p>	
13.2	Castaic Lake Water Agency	11/18/08	<p>Effective October 23, 2008, CLWA and SCWD, along with various Los Angeles and Ventura County stakeholders, have entered into a Memorandum of Understanding (MOU) to implement the AWRM Program. The MOU represents the collective commitment of the stakeholders to implement a watershed-wide solution to the chloride problem that not only protects all beneficial uses, but also provides the most diverse set of water resource benefits to the stakeholders.</p>	Comment acknowledged.
13.3	Castaic Lake Water Agency	11/18/08	<p>CLWA and SCWD believe that the Regional Board's proposed amendment to the Basin Plan and the resultant chloride site-specific objectives necessary to implement the AWRM Program will allow for the best solution to the Chloride TMDL. Therefore, CLWA and SCWD urge the Regional Board to approve this important Basin Plan amendment.</p>	Comment acknowledged.