

Ventura County Watershed Protection District



PUBLIC WORKS AGENCY
JEFF PRATT
Agency Director

June 19, 2015

California Regional Water Quality Control Board
Los Angeles Region
Attn: Dr. Ginachi Amah
320 West Fourth Street, Suite 200
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Subject: Comment Letter - Incorporation of Salt and Nutrient Management Measures for the Lower Santa Clara River Basin

Dear Dr. Amah:

The Ventura County Public Works Agency Watershed Protection District; Cities of Ventura, Santa Paula, and Fillmore; Ventura County Water Works District 16; United Water Conservation District; and the Ventura County Agricultural Irrigated Lands Group (collectively Stakeholders) appreciate the opportunity to provide comments on the incorporation of the Lower Santa Clara Salt and Nutrient Management Plan (LSCR SNMP) into the Water Quality Control Plan for the Los Angeles Region (Basin Plan).

The Stakeholders worked closely together to develop a SNMP that reflects the unique characteristics and status of recycled water planning in the LSCR basins. The Stakeholders developed the plan to achieve the goal of protecting, conserving, and augmenting water supplies to improve water supply reliability in the planning area. As municipal and agricultural users in the LSCR rely heavily on the use of groundwater for water supply, the Stakeholders feel the plan will support sustainable use of this important resource into the future.

The Stakeholders appreciate the feedback, support, and participation of Regional Water Board staff during the development of the SNMP. We have reviewed and support the *Proposed Amendment to the Water Quality Control Plan for the Los Angeles Region to Incorporate Salt and Nutrient Management Measures for the Lower Santa Clara River Basin* (Proposed Basin Plan Amendment). We feel the Proposed Basin Plan Amendment provides a good representation of the contents of the SNMP.

While the Basin Plan Amendment provides a good representation of the SNMP, we have identified a few locations within the SNMP where we feel modifications would better reflect the process for project evaluation outlined in the SNMP. The development of recycled

water projects in the LSCR SNMP is a dynamic process that will evolve over the planning period. All of the wastewater agencies have a goal of maximizing the beneficial reuse of their wastewater over time. So while the specific details of many of the projects are still being defined, the intention of the SNMP was to provide a framework that will facilitate the permitting of projects that meet conditions outlined in the SNMP. The attachment to this letter outlines suggested modifications to better capture this intention and the process that will be utilized to evaluate projects in the planning area.

We appreciate your consideration of these comments. If you have any questions, please contact Gerhardt Hubner at (805) 654-5051.

Sincerely,



Gerhardt Hubner
Deputy Director

On Behalf of the Salt and Nutrient Management Plan Technical Advisory Group

Attachment - Recommended Clarifications

Recommended Clarifications

On page 17 in the last sentence of the first paragraph, the language states "where necessary, from advanced treatment of wastewater effluent by reverse osmosis." This sentence should be revised to refer to the process outlined in the SNMP for determining when additional control measures are needed and acknowledge that reverse osmosis or other control measures could be implemented. Following are suggested edits for this sentence.

Further reductions in effluent chloride concentrations are expected to occur through future source control efforts, including from the removal of existing water softeners in the SNMP planning area through a rebate program and, where necessary, if found to be necessary using the procedures outlined in Section 9 of the LSCR SNMP, from implementation of additional control measures, including consideration of advanced treatment of wastewater effluent by reverse osmosis.

On page 17, please add the following sentence to the end of the second paragraph to explain that the listed projects are currently being considered, but other projects may be defined that would be evaluated using the procedures outlined in the SNMP.

Additional projects may be defined or the projects identified in the table may be modified during implementation. The procedures outlined in Section 9 of the LSCR SNMP will be used to evaluate additional or modified recycled water projects as they are developed.

On page 20, please add the following sentences before the last sentence in the first paragraph to clarify the purpose of the project scenarios.

While a number of projects are currently in the planning stages, the potential exists for agencies to maximize recycling of all current and future effluent flows up to the design capacities of the treatment plants. The project scenarios were developed to reflect the full range of potential recycled water use, including both planned and potential future projects.

On page 21, please modify the last sentence of the first paragraph as follows:

The LSCR Basins SNMP includes a menu of further management measures that could be implemented to manage salts and nutrients on a sustainable basis if determined to be necessary based on the evaluation outlined in Section 9 of the SNMP in such cases. (Table 8.2-6c).

On page 30, please delete number (iii) in the paragraph under the heading Updates to the Salt and Nutrient Management Measures and replace with the text below. Because the SNMP presents a framework for evaluating projects and a menu of management measures, updating the measures is not necessary on a specified time period, but rather if conditions or proposed projects change.

(iii) if needed to address additional or modified recycled water projects.

In the Tentative Resolution, on page 4, item 17, please delete the following language in the first sentence: address elevated levels of salts and nutrients in localized areas. While the plan will prevent additional salt loading in areas with elevated levels, it is not designed to remediate those locations. Additionally, some of the locations with elevated salts and nutrients are a result of natural conditions that cannot be addressed by the stakeholders.

Finally, we have received a late comment on the SNMP document and propose to make the following change to Page 9-22, Section 9.3, second paragraph to address the comment.

For Piru, the analysis assumes implementation of projects by the Los Angeles County Sanitation Districts to reduce chloride concentrations in the discharge from the Valencia and Saugus WRPs to meet applicable effluent limitations will result in concentrations at or below 100 mg/L as a three month, flow weighted average at the County line occur by 2019.