

DR. ED HERNANDEZ, O.D.  
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CHAIR

BOB HUFF  
29TH SENATE DISTRICT  
VICE CHAIR

TEL (916) 651-4024  
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# California State Legislature

## SAN GABRIEL VALLEY LEGISLATIVE CAUCUS

REPRESENTING THE CITIES & COMMUNITIES OF THE SAN GABRIEL VALLEY



April 2, 2014

Samuel Unger  
Executive Office  
Los Angeles Regional Water Quality Control Board  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

### Support For San Gabriel Basin Watershed Based General Discharge Permit To Address Large Volume Potable Water Well Discharges

Dear Mr. Unger:

On behalf of myself and the undersigned, I write to express our sincere appreciation for the effort by the staff of the Los Angeles Regional Water Quality Control Board (Regional Board) to develop a watershed based National Pollution Discharge Elimination System (NPDES) general permit for large volume discharges from potable water treatment wells throughout the San Gabriel Valley. This important effort is long awaited and will serve to facilitate the continued management of the groundwater supply in the San Gabriel Valley region of Los Angeles County.

The San Gabriel River Watershed basin provides water supply to an estimated 1.4 million people in an area of 170 square miles. Water entities in the basin conduct short-term, large volume discharges during well drilling, well development, redevelopment, and treatment plant startups at various groundwater cleanup sites to test the aquifer and wells. In order to comply with California Department of Public Health requirements treated water must undergo testing before it is served to businesses and households throughout the San Gabriel Valley. During the required testing period, this water must be discharged into the storm drain.

Due to the imperative nature of these discharges, we wish to communicate our support of the issuance of a permit that will facilitate the groundwater remediation activities so vital for continued reliable potable water supply in this region. We understand that a draft permit will come before the Regional Board at the June meeting. Thank you for your time and effort, and we look forward to a final permit and the continued success of groundwater management in the San Gabriel Valley.

Sincerely,

A blue ink signature of Senator Ed Hernandez, O.D., Chair, written over a horizontal line.

Senator Ed Hernandez, O.D., Chair  
24<sup>th</sup> District

A blue ink signature of Senator Bob Huff, Vice Chair, written over a horizontal line.

Senator Bob Huff, Vice Chair  
29<sup>th</sup> District

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Assemblymember Roger Hernandez  
48<sup>th</sup> District



Assemblymember Chris Holden  
41<sup>st</sup> District



Assemblymember Freddie Rodriguez  
52<sup>nd</sup> District

## Jain, Namiraj@Waterboards

---

**From:** Hung, David@Waterboards  
**Sent:** Thursday, June 26, 2014 3:37 PM  
**To:** Jain, Namiraj@Waterboards; Anijielo, Augustine@Waterboards  
**Subject:** FW: Comments on proposed WDR/NPDES permit for groundwater discharges

Please include this in the agenda package. Thanks.

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**From:** Smith, DavidW [<mailto:Smith.DavidW@epa.gov>]  
**Sent:** Thursday, June 26, 2014 3:25 PM  
**To:** Hung, David@Waterboards  
**Cc:** Stuber, Robyn@epamail.epa.gov  
**Subject:** Comments on proposed WDR/NPDES permit for groundwater discharges

RE: Tentative Waste Discharge Requirements and General National Pollutant Discharge Elimination System Permit for Discharges of groundwater from Upper San Gabriel River and Rio Hondo Watersheds to Surface Waters in Coastal Watersheds of Los Angeles County

Dear David:

I hope you are well. I wanted to pass along some comments concerning the referenced permit.

Earlier this year, U.S. EPA Region 9 Water Division and Superfund Division staff provided technical comments on preliminary drafts of the proposed general permit for discharges of groundwater from the upper San Gabriel River and Rio Hondo watersheds to surface waters in coastal watersheds of Los Angeles County. We appreciated that opportunity to coordinate closely with your office on this important effort and to clarify key elements of the permit related to discharges proposed for permit coverage. Using well-tailored strict eligibility criteria, available water quality standards exceptions, and protective NPDES effluent limits, including numeric WQBELs based on applicable TMDL wasteload allocations, the proposed permit strikes an appropriate balance to protect receiving water quality and ensure that surface water and groundwater standards are met. We are pleased to support adoption of the proposed general permit.

Sincerely,

David Smith  
Manager  
NPDES Permits Office (WTR-5)  
U.S. EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94602  
(415) 972-3464 (office)  
(415) 972-947-3545 (fax)



## **San Gabriel Valley Civic Alliance**

June 13, 2014

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Dear Mr. Unger:

The San Gabriel Valley Civic Alliance (SGVCA) appreciates the opportunity to submit comments on the Los Angeles Regional Water Quality Control Board's ("Regional Board") draft Waste Discharge Requirements for Discharges of Groundwater from San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel River and Rio Hondo Watersheds-Los Angeles County General NPDES Permit ("Permit"). As described below, we support the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that important potable water treatment and reuse may resume in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people.

The mission of the SGVCA is to galvanize into constructive community action a diverse, broad, non-partisan group of San Gabriel Valley leaders committed to economic prosperity for business, educational excellence for our children, and a collaborative approach to improving civic life.

Past industrial activities within the San Gabriel Valley have resulted in widespread contamination of the groundwater. The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects have been responsible for removing

more than 60 tons of total contaminants from the groundwater basin since the contamination was discovered in 1979. The WQA recognizes the importance of integrating basin cleanup with water supply needs in addition to the opportunity this presents, and currently some of these projects are stalled. On behalf of the concerned water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treatment plant startups and testing operations. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and allow us to continue serving clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No water will flow to the Pacific Ocean.

WQA and their partners have made great progress in the cleanup of the San Gabriel Basin, however, the current drought that is being experienced throughout the State of California highlights the growing importance of enhancing existing potable water supply. The San Gabriel Basin provides 92% of all the water use in the San Gabriel Valley and also serves as a crucial water source for portions of Orange County and the Central Basin. This Permit will allow local water agencies with ability to utilize wells and treatment plants.

Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they can deliver up to 90,000 acre-feet per year of treated groundwater for potable use. We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,

Edward J. Rendon  
Chairman



# San Gabriel Basin Water Quality Authority

1720 W. Cameron Avenue, Suite 100, West Covina, CA 91790 • 626-338-5555 • Fax 626-338-5575

2014 JUN 16 PM 3 38  
CALIFORNIA REGIONAL WATER  
QUALITY CONTROL BOARD  
LOS ANGELES REGION

June 12, 2014

Mr. Sam Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Re: General NPDES Permit, Support

Mr. Unger

The San Gabriel Basin Water Quality Authority (WQA) would like to thank you and your staff for the assistance you have provided our organization in the development of this General NPDES Permit. As you are aware the San Gabriel Basin is the largest USEPA Superfund site in the country and is the primary drinking water source for over 1.4 million people. The WQA and its partners have spent over two decades and over \$600 million dollars developing projects that strip the water of these harmful contaminants and then use the water in our potable water systems. Without this permit, all that was in jeopardy of being stranded.

The WQA is in full support of the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that the WQA and its partners can continue to provide potable water treatment and remediation to the water supply of the over 1.4 million people who count on this water supply for their existence.

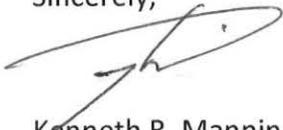
The WQA is an agency created by the state of California in 1993 to aggressively attack the groundwater pollution issues found in the late 1970's. During the Cold War Era many industries move into the San Gabriel Valley and began a massive effort to supply products for the war effort and consumer consumption. Those industrial practices were incomplete and left a legacy of pollution that has made its way into the aquifer that provides over 90% of the water to the valley inhabitants. Since our initial efforts in the 90's the WQA and its partners has treated over 1.3 million acre feet of water and supplied it to the people who reside in and around the valley.

To date we have been successful in extracting over 70 tons of contaminants from the water. As mentioned, this was all in jeopardy if we did not find a solution to the dilemma we were in regarding temporary discharges.

You and your staff have been instrumental in assisting and guiding our efforts towards a solution that makes sense for us and is still sensitive to the environment. Under this Permit, water agencies in the San Gabriel Basin and the Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treat plant startups and testing operations. As soon as the Department of Public Health (soon to be Drinking Water Programs of the SWRCB) is confident that the technology is capable to treat these harmful contaminants, the discharges will cease and the water will be diverted into the potable water systems of the producer. We estimate that the time indicated in the Permit is sufficient to accomplish this given our twenty years of experience.

The current drought that we are experiencing in the State of California highlights the growing importance of enhancing existing potable water supply. Without these projects treating groundwater in the San Gabriel Valley we would be forced to import almost 100,000 acre feet annually of water to offset the lost supply. This would be a tremendous strain on the Delta and the ecosystems we all want to protect. We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Manning', with a large, sweeping flourish at the end.

Kenneth R. Manning  
Executive Director



GAIL FARBER, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-5100  
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE:

WM-9

June 16, 2014

Mr. Samuel Unger, P.E.  
Executive Officer  
California Regional Water Quality  
Control Board – Los Angeles Region  
320 West 4th Street, Suite 200  
Los Angeles, CA 90013-2343

Attention Mr. Augustine Anijielo

Dear Mr. Unger:

**COMMENTS ON GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION  
SYSTEM PERMIT FOR DISCHARGES OF GROUNDWATER FROM UPPER  
SAN GABRIEL RIVER AND RIO HONDO WATERSHED IN COASTAL WATERSHED  
OF LOS ANGELES COUNTY**

Thank you for the opportunity to comment on the subject draft General Permit. The Los Angeles County Flood Control District is supportive of this General Permit approach and appreciates the efforts already made to develop the Permit for these previously unregulated discharges. Enclosed are our comments that are intended to add more clarity to some of the permit provisions and to promote collaboration between the discharger and affected municipal separate storm sewer system owners and operators.

2014 JUN 19 PM 1 06  
CALIFORNIA REGIONAL WATER  
QUALITY CONTROL BOARD  
LOS ANGELES REGION

Mr. Samuel Unger  
June 16, 2014  
Page 2

If you have any questions, please contact me at (626) 458-4300 or ghildeb@dpw.lacounty.gov or your staff may contact Ms. Angela George at (626) 458-4325 or ageorge@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER  
Director of Public Works



GARY HILDEBRAND  
Assistant Deputy Director  
Watershed Management Division

ACL:ba

P:\wmpub\Secretarial\2014 Documents\Letter\Gen Permit WQA Comment Letter.docx\C14130

Enc.

cc: County Counsel (Fries)  
Flood Maintenance (White)  
Land Development (Chinn)  
Water Resources (Walden)

**COMMENTS ON GENERAL NPDES PERMIT FOR DISCHARGES OF GROUNDWATER FROM UPPER SAN GABRIEL RIVER AND RIO HONDO WATERSHED IN COASTAL WATERSHED OF LOS ANGELES COUNTY**

Below are the Los Angeles County Flood Control District's comments on the subject draft general permit.

- I. **The General Permit requires advance notification to MS4 owners prior to discharging, but this requirement is not stated consistently throughout the permit, and it should specify how much advance notice is required.**

Provision A.2.b. on Page 14 states that the discharger *shall* notify the applicable MS4 permittee of the *planned* discharge. Finding F.17 on Page 10, however, may be interpreted as only encouraging dischargers to provide advance notification to MS4 owners prior to discharge of significant volume of water that could impact MS4 owners' facilities ability to meet MS4 requirements. In addition, the General Permit should require the dischargers to provide at least seven days advance notification to the owners of MS4 and other facilities that may be impacted. This would allow the MS4 owners to evaluate the proposed discharge and verify that it can be infiltrated to the groundwater basin, particularly if the discharger is proposing to infiltrate behind an existing rubber dam belonging to the MS4 owner. Finally, the same requirement should apply to new dischargers prior to start-up. We recommend the following revisions:

Finding F.17 on Page 10:

"The Regional Board encourages dischargers enrolled under this general NPDES permit to coordinate their water quality protection activities, including **and requires** dischargers **to provide** adequate notification to MS4 owners **at least seven days** prior to discharge of significant volume of water that could impact MS4 owners' facilities ability to meet MS4 requirements."

Provision A.2.b. on Page 14: *see proposed language in Comment II below.*

Notification Requirement A.1.d.4. on Page D-10 (fact sheet):

"New Dischargers shall notify the Regional Water Board staff **and applicable MS4 owners** of the time and date for commencement of the discharge(s) authorized under this General Permit at least seven days prior to initiating a discharge."



**II. The General Permit should require dischargers to obtain required local permits from affected MS4 owners.**

The Los Angeles County Flood Control District (LACFCD) currently requires dischargers to obtain a Flood Permit to utilize its facilities. During the review of the permit application for a proposed discharge, the LACFCD evaluates the discharge for potential impacts to the operation and maintenance of its system as well as potential impacts to receiving water quality. The General Permit should include language that requires dischargers to obtain any required local permits from affected MS4 owners to ensure that the discharges do not adversely affect existing facilities. This is particularly critical if temporary diversion BMPs, such as rubber dams, are proposed to be installed. We recommend the following revision to Provision A.2.b. on Page 14:

“...The Discharger shall first secure any applicable local permits and subsequently notify the applicable MS4 permittee owners at least seven days in advance of the planned discharge.”

**III. It is not necessary for the General Permit to incorporate wet weather WQBELs.**

It is our understanding that the discharges covered under this General Permit are only to occur during dry flow periods. Therefore, it is not necessary to incorporate wet weather WQBELs for either the Los Angeles River and Tributaries or the San Gabriel River and Impaired Tributaries. For clarity, we recommend deleting Tables 3 and 5 on Pages 11 and 12, and Tables 5 and 7 in the Fact Sheet on Page D-20.

**IV. The dry weather WQBELs incorporated into the General Permit should correspond to the reaches where the discharges will occur and should be consistent with the WQBELs specified in the applicable TMDLs.**

The General Permit covers discharges from facilities located upstream of Whittier Narrows (Discharge Information on Page 4). However, the WQBELs included for Rio Hondo in Table 2 on Page 11 and San Gabriel River in Table 4 on Page 12 are downstream of Whittier Narrows. The specified reaches and corresponding WQBELs should correspond to the actual discharge locations and should be consistent with the WQBELs specified in the applicable TMDLs. Corresponding revisions should be made to Tables 4 and 6 in the Fact Sheet on Page D-20.

V. **Additional pollutants should be included in Table 1. Effluent Limitations.**

Given the well documented concerns regarding nutrients in groundwater (i.e. nitrogen and phosphorus), nutrients should be added to Table 1. Effluent Limitations on Page 11 as shown below:

<b>Parameters</b>	<b>Units</b>	<b>Effluent Limitations</b>
		<b>Maximum Daily</b>
Total Nitrogen	mg/L	1
Total Phosphorus	mg/L	0.1



June 16, 2014

Mr. Samuel Unger, Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013  
Via Email: njain@waterboards.ca.gov

Re: General NPDES Permit

Dear Mr. Unger:

Friends of the River and the California Wilderness Coalition support the current draft of the Los Angeles County General NPDES Permit for the Upper San Gabriel River and Rio Hondo Watersheds. Issuing this permit will allow the San Gabriel Basin Water Quality Authority to clean up polluted groundwater to help meet local water demand. No polluted groundwater would be discharged into the San Gabriel River, Rio Hondo, or the Pacific Ocean.

Our organizations have been working with the Authority to help protect the source of the valley's water supply in the San Gabriel Mountains. Permitting this project will result in the reuse and replenishment of 6,000 acre-feet of groundwater. This will allow the region to be more self-reliant and avoid increasing its dependence on costly and environmentally damaging water exports from northern California.

We support the RWQCB staff recommendation to issue this permit to facilitate groundwater remediation and improve the reliability of the region's potable water supply.

Thank you.

Sincerely,

Steven L. Evans  
Consultant



ASIAN PACIFIC POLICY & PLANNING COUNCIL

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June 16, 2014

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

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

Re: General NPDES Permit

Dear Mr. Unger:

The Asian Pacific Policy & Planning Council (A3PCON) appreciates the opportunity to submit comments on the Los Angeles Regional Water Quality Control Board's ("Regional Board") draft Waste Discharge Requirements for Discharges of Groundwater from San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel River and Rio Hondo Watersheds-Los Angeles County General NPDES Permit ("Permit"). As described below, we support the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that important potable water treatment and reuse may resume in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people.

Founded in 1976, A3PCON is an association of over forty Asian Pacific community nonprofit organizations in Los Angeles County, with committees in the fields of children and families, health, mental health, older adults, housing and economic development and environmental justice.

Past industrial activities within the San Gabriel Valley have resulted in widespread contamination of the groundwater. The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects have been responsible for removing more than 60 tons of total contaminants from the groundwater basin since the contamination was discovered in 1979. The WQA recognizes the importance of integrating basin cleanup with water supply needs in addition to the opportunity this presents, and currently some of these projects are stalled. On behalf of the concerned water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treatment plant startups and testing operations. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and allow us to continue serving clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No water will flow to the Pacific Ocean.

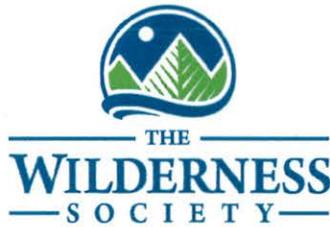
WQA and their partners have made great progress in the cleanup of the San Gabriel Basin, however, the current drought that is being experienced throughout the State of California highlights the growing importance of enhancing existing potable water supply. The San Gabriel Basin provides 92% of all the water use in the San Gabriel Valley and also serves as a crucial water source for portions of Orange County and the Central Basin. This Permit will allow local water agencies with ability to utilize wells and treatment plants.

Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they can deliver up to 90,000 acre-feet per year of treated groundwater for potable use. We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,

Mark Masaoka, A3PCON Policy Director

Email: [mmasaka@A3PCON.org](mailto:mmasaoka@A3PCON.org)



June 16, 2014

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

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

Re: General NPDES Permit

Dear Mr. Unger:

The Wilderness Society ("TWS") appreciates the opportunity to submit comments on the Los Angeles Regional Water Quality Control Board's ("Regional Board") draft Waste Discharge Requirements for Discharges of Groundwater from San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel River and Rio Hondo Watersheds-Los Angeles County General NPDES Permit ("Permit"). As described below, we support the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that important potable water treatment and reuse may resume in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people.

The Wilderness Society is the leading public-lands conservation organization working to protect wilderness and inspire Americans to care for our wild places. Founded in 1935, and now with more than 500,000 members and supporters, TWS has led the effort to permanently protect 110 million acres of wilderness and to ensure sound management of our shared national lands. TWS is also a member of San Gabriel Mountains Forever - a partnership of residents, cities, community groups and others - working to protect the San Gabriel Mountains and rivers for families today, as well future generations who will be the stewards of this spectacular natural resource.

Past industrial activities within the San Gabriel Valley have resulted in widespread contamination of the groundwater. The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects have been responsible for removing more than 60 tons of total contaminants from the groundwater basin since the contamination was

discovered in 1979. The WQA recognizes the importance of integrating basin cleanup with water supply needs in addition to the opportunity this presents, and currently some of these projects are stalled. On behalf of the concerned water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treatment plant startups and testing operations. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and produce clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. WQA and their partners have made great progress in the cleanup of the San Gabriel Basin, however, the current drought that is being experienced throughout the State of California highlights the growing importance of enhancing the potable water supply. The San Gabriel Basin provides 92% of all the water use in the San Gabriel Valley and also serves as a crucial water source for portions of Orange County and the Central Basin. This Permit will allow local water agencies with the ability to utilize wells and treatment plants.

Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they will be able to deliver up to 90,000 acre-feet per year of treated groundwater for potable use. We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan Smuts', with a long horizontal flourish extending to the right.

Dan Smuts  
Senior Regional Director, California  
The Wilderness Society  
714 West Olympic Blvd, Suite 614  
Los Angeles, CA 90015



June 16, 2014

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Sent Via Email: [njain@waterboards.ca.gov](mailto:njain@waterboards.ca.gov)

Re: General NPDES Permit

Dear Mr. Unger:

San Gabriel Mountains Forever (SGMF) recommends that the Regional Water Quality Control Board (Board) adopt the NPDES Permit as soon as possible so that important potable water treatment and reuse may resume in in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people.

SGMF is working on federal protections for the San Gabriel Mountains, Foothills and Rivers which will protect and enhance water supply and water quality. We have worked with many of the water agencies in the region and support their efforts to clean up our water supply. The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects have been responsible for removing more than 60 tons of total contaminants from the groundwater basin since the contamination was discovered in 1979. The WQA recognizes the importance of integrating basin cleanup with water supply needs in addition to the opportunity this presents, and currently some of these projects are stalled. On behalf of the concerned water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development,

redevelopment and treatment plant startups and testing operations. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and allow us to continue serving clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No water will flow to the Pacific Ocean.

WQA and their partners have made great progress in the cleanup of the San Gabriel Basin, however, the current drought that is being experienced throughout the State of California highlights the growing importance of enhancing existing potable water supply. The San Gabriel Basin provides 92% of all the water use in the San Gabriel Valley and also serves as a crucial water source for portions of Orange County and the Central Basin. This Permit will allow local water agencies with ability to utilize wells and treatment plants.

Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they can deliver up to 90,000 acre-feet per year of treated groundwater for potable use. We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,



Belinda V. Faustinos, Co-Chair  
San Gabriel Mountains Forever

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# COVINA IRRIGATING COMPANY

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June 12, 2014

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

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

Re: General NPDES Permit

Dear Mr. Unger:

Covina Irrigating Company appreciates the opportunity to submit comments on the Los Angeles Regional Water Quality Control Board's ("Regional Board") draft Waste Discharge Requirements for Discharges of Groundwater from San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel River and Rio Hondo Watersheds-Los Angeles County General NPDES Permit ("Permit"). As described below, we support the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that important potable water treatment and reuse may resume in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people.

Covina Irrigating Company is a wholesale mutual water company which provides water to four water agencies and two cities in Los Angeles County. We have been in continuous operation as a mutual water company since our incorporation in 1882.

Past industrial activities within the San Gabriel Valley have resulted in widespread contamination of the groundwater. The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects have been responsible for removing more than 60 tons of total contaminants from the groundwater basin since the contamination was discovered in 1979. The WQA recognizes the importance of integrating basin cleanup with water supply needs in addition to the opportunity this

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Page 2

presents, and currently some of these projects are stalled. On behalf of the concerned water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treatment plant startups and testing operations. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and allow us to continue serving clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No water will flow to the Pacific Ocean.

WQA and their partners have made great progress in the cleanup of the San Gabriel Basin, however, the current drought that is being experienced throughout the State of California highlights the growing importance of enhancing existing potable water supply. The San Gabriel Basin provides 92% of all the water use in the San Gabriel Valley and also serves as a crucial water source for portions of Orange County and the Central Basin. This Permit will allow local water agencies with ability to utilize wells and treatment plants.

Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they can deliver up to 90,000 acre-feet per year of treated groundwater for potable use. We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,

A handwritten signature in black ink, appearing to read "David De Jesus". The signature is fluid and cursive, with the first name "David" being the most prominent part.

David De Jesus, President/CEO

June 16, 2014

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Sent Via Email: [njain@waterboards.ca.gov](mailto:njain@waterboards.ca.gov)

Re: General NPDES Permit

Dear Mr. Unger:

I am writing this letter to recommend that the Regional Water Quality Control Board (Board) adopt the NPDES Permit as soon as possible so that important potable water treatment and reuse may resume in in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people.

For more than 30 years I have worked on environmental, park and integrated resource management issues in the greater Los Angeles Region and spent ten years as the Executive Officer of the Rivers and Mountains Conservancy (RMC) and several affiliated joint powers entities. The RMC and its affiliated entities have worked with many of the water agencies in the region and support their efforts to clean up our water supply and water quality throughout the region.

The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects have been responsible for removing more than 60 tons of total contaminants from the groundwater basin since the contamination was discovered in 1979. The WQA recognizes the importance of integrating basin cleanup with water supply needs in addition to the opportunity this presents, and currently some of these projects are stalled. On behalf of the concerned water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development,

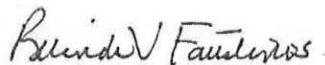
June 16, 2014  
NPDES Permit  
Page 2

redevelopment and treatment plant startups and testing operations. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and allow us to continue serving clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No water will flow to the Pacific Ocean.

WQA and their partners have made great progress in the cleanup of the San Gabriel Basin, however, the current drought that is being experienced throughout the State of California highlights the growing importance of enhancing existing potable water supply. The San Gabriel Basin provides 92% of all the water use in the San Gabriel Valley and also serves as a crucial water source for portions of Orange County and the Central Basin. This Permit will allow local water agencies with ability to utilize wells and treatment plants.

Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they can deliver up to 90,000 acre-feet per year of treated groundwater for potable use. I appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,



Belinda V. Faustinos, Retired Executive Officer  
Rivers and Mountains Conservancy



1000 N. ALAMEDA ST #240  
LOS ANGELES, CA 90012  
213.293.4929

June 16, 2014

Samuel Unger  
Executive Officer, RWQCB Los Angeles  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013  
via email: [njain@waterboards.ca.gov](mailto:njain@waterboards.ca.gov)

Re: General NPDES Permit - SUPPORT

Dear Mr. Unger:

Climate Resolve is Southern California's premiere climate change organization. I wish to submit comments on the Los Angeles Regional Water Quality Control Board's ("Regional Board") draft Waste Discharge Requirements for Discharges of Groundwater from San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel River and Rio Hondo Watersheds-Los Angeles County General NPDES Permit ("Permit"). As described below, we support the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that important potable water treatment and reuse may resume in in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people.

Climate Resolve is working to make the Los Angeles region more resilient in the face of changing climate. With the projected reduction in California's snowpack, due to climate change, imported water supplies will be at greater risk. Local water therefore becomes much more important. Cleaning-up local water is a climate resilience matter.

Past industrial activities within the San Gabriel Valley have resulted in widespread contamination of the groundwater. The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects have been responsible for removing more than 60 tons of total contaminants from the groundwater basin since the contamination was discovered in 1979. The WQA recognizes the importance of integrating basin cleanup with water supply needs in addition to the opportunity this presents, and currently some of these projects are stalled. On behalf of the concerned water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

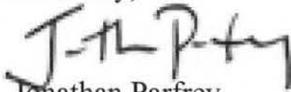
Under the Permit, water agencies in the San Gabriel and Rio Hondo

Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treatment plant startups and testing operations. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and allow us to continue serving clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No water will flow to the Pacific Ocean.

WQA and their partners have made great progress in the cleanup of the San Gabriel Basin, however, the current drought that is being experienced throughout the State of California highlights the growing importance of enhancing existing potable water supply. The San Gabriel Basin provides 92% of all the water use in the San Gabriel Valley and also serves as a crucial water source for portions of Orange County and the Central Basin. This Permit will allow local water agencies with ability to utilize wells and treatment plants.

Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they can deliver up to 90,000 acre-feet per year of treated groundwater for potable use. We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Parfrey". The signature is written in a cursive, somewhat stylized font.

Jonathan Parfrey  
Executive Director

# TEAMSTERS JOINT COUNCIL 42

INTERNATIONAL BROTHERHOOD OF TEAMSTERS



*Our Members Are Our Strength . . . Our Children Are Our Future . . . Our Retirees Are Our Foundation*

981 CORPORATE CENTER DRIVE • SUITE 200 • POMONA, CA 91768

PHONE (626) 974-4212 • FAX (626) 974-4241

June 13, 2014

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Dear Mr. Unger:

Teamsters Joint Council 42 appreciates the opportunity to submit comments on the Los Angeles Regional Water Quality Control Board's ("Regional Board") draft Waste Discharge Requirements for Discharges of Groundwater from San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel River and Rio Hondo Watersheds-Los Angeles County General NPDES Permit ("Permit"). As described below, we support the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that important potable water treatment and reuse may resume in in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people.

Teamsters Joint Council 42 is the parent body to 22 Teamster Local Unions located and representing members in Southern California, Southern Nevada, Guam, Saipan, and Hawaii. Some 200,000 working Teamsters and Retirees are affiliated with the JC 42 Family.

Past industrial activities within the San Gabriel Valley have resulted in widespread contamination of the groundwater. The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects have been responsible for removing more than 60 tons of total contaminants from the groundwater basin since the contamination was discovered in 1979. The WQA recognizes the importance of integrating basin cleanup with water supply needs in addition to the opportunity this presents, and currently some of these projects are stalled. On behalf of the concerned

Randy Cammack  
President

• Bob Lennox  
Vice President

• Mike Bergen  
Secretary-Treasurer

• Ron Herrera  
Recording Secretary

• Leo Reed  
Trustee

• Patrick Kelly  
Trustee

• Chris Griswold  
Trustee

water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treatment plant startups and testing operations. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and allow us to continue serving clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No water will flow to the Pacific Ocean.

WQA and their partners have made great progress in the cleanup of the San Gabriel Basin, however, the current drought that is being experienced throughout the State of California highlights the growing importance of enhancing existing potable water supply. The San Gabriel Basin provides 92% of all the water use in the San Gabriel Valley and also serves as a crucial water source for portions of Orange County and the Central Basin. This Permit will allow local water agencies with ability to utilize wells and treatment plants.

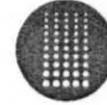
Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they can deliver up to 90,000 acre-feet per year of treated groundwater for potable use. We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,



Edward J. Rendon  
Director of Public Affairs

EJR/kr



**Suburban  
Water Systems**

A SouthWest Water Company

JOHN A. BRETTL  
Vice President  
1325 N. Grand Avenue  
Suite 100  
Covina, CA 91724-4044  
Phone: 626.543.2643  
Fax: 626.331.6363  
www.swwc.com

June 12, 2014

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

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

Re: General NPDES Permit

Dear Mr. Unger:

Suburban Water Systems (Suburban) appreciates the opportunity to submit comments on the Los Angeles Regional Water Quality Control Board's ("Regional Board") draft Waste Discharge Requirements for Discharges of Groundwater from San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel River and Rio Hondo Watersheds-Los Angeles County General NPDES Permit ("Permit"). As described below, we support the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that important potable water treatment and reuse may resume in in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people.

Suburban, an investor owned water utility, serves in excess of 75,000 customers and operates in or near Covina, West Covina, La Puente, Glendora, Hacienda Heights, Walnut, Whittier, La Mirada, and adjacent unincorporated areas in Los Angeles County, and Buena Park, La Habra and adjacent unincorporated areas in Orange County. Suburban's customers in its San Jose Hills service area will directly benefit from one of the listed projects, the Puente Valley Operable Unit Intermediate Zone Treatment Facility. Suburban will operate the treatment plant and deliver the treated water to residents and businesses in its San Jose Hills Service area. The treatment facility will provide a valuable local potable water supply and will protect the San Gabriel Basin's vital groundwater resource.

Past industrial activities within the San Gabriel Valley have resulted in widespread contamination of the groundwater. The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects have been responsible for removing

more than 60 tons of total contaminants from the groundwater basin since the contamination was discovered in 1979. The WQA recognizes the importance of integrating basin cleanup with water supply needs in addition to the opportunity this presents, and currently some of these projects are stalled. On behalf of the concerned water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treatment plant startups and testing operations. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and allow us to continue serving clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No water will flow to the Pacific Ocean.

WQA and their partners have made great progress in the cleanup of the San Gabriel Basin, however, the current drought that is being experienced throughout the State of California highlights the growing importance of enhancing existing potable water supply. The San Gabriel Basin provides 92% of all the water use in the San Gabriel Valley and also serves as a crucial water source for portions of Orange County and the Central Basin. This Permit will allow local water agencies with ability to utilize wells and treatment plants.

Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they can deliver up to 90,000 acre-feet per year of treated groundwater for potable use. ~~We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater~~ remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,



John A. Brett  
Vice President



# City of Azusa

June 16, 2014

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

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

Re: General NPDES Permit

Dear Mr. Unger:

Azusa Light & Water appreciates the opportunity to submit comments on the Los Angeles Regional Water Quality Control Board's ("Regional Board") draft Waste Discharge Requirements for Discharges of Groundwater from San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel River and Rio Hondo Watersheds-Los Angeles County General NPDES Permit ("Permit"). As described below, we support the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that important potable water treatment and reuse may resume in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people.

The City of Azusa Water System serves an equivalent population of 110,000 people in the San Gabriel Valley. In addition to the City of Azusa, the water system also serves portions of the cities of West Covina, Covina, Irwindale, and Glendora, and also serves a portion of Los Angeles County adjacent to those cities. The Azusa Water System relies on several sources of water supply including underground water, which is pumped from 11 deep wells currently in operation within the Main San Gabriel Basin.

Past industrial activities within the San Gabriel Valley have resulted in widespread contamination of the groundwater. The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects have been responsible for removing more than 60 tons of total contaminants from the groundwater basin since the contamination was discovered in 1979. The WQA recognizes the importance of integrating basin cleanup with water supply needs in addition to the opportunity this

**NPDES Permit**

**Page 2**

presents, and currently some of these projects are stalled. On behalf of the concerned water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treatment plant startups and testing operations. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and allow us to continue serving clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No water will flow to the Pacific Ocean.

WQA and their partners have made great progress in the cleanup of the San Gabriel Basin; however, the current drought that is being experienced throughout the State of California highlights the growing importance of enhancing existing potable water supply. The San Gabriel Basin provides 92% of all the water use in the San Gabriel Valley and also serves as a crucial water source for portions of Orange County and the Central Basin. This Permit will allow local water agencies with ability to utilize wells and treatment plants.

Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they can deliver up to 90,000 acre-feet per year of treated groundwater for potable use. We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,



*for* George F. Morrow  
Director of Utilities

cc: Ken Manning, Director, San Gabriel Basin Water Quality Authority  
Chet F. Anderson, P.E, Assistant Director -Water Operations, Azusa

William R. Rojas  
President

John P. Escalera  
Vice President

Charles Aguirre  
Director



David Hastings  
Director

Henry P. Hernandez  
Director

Greg B. Galindo  
General Manager

112 N. First St. / P.O. Box 3136  
La Puente, CA 91744  
(626) 330-2126 – Fax (626) 330-2679  
[www.lapuentewater.com](http://www.lapuentewater.com)

June 13, 2013

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

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

Re: General NPDES Permit

Dear Mr. Unger:

La Puente Valley County Water District ("District"), appreciates the opportunity to submit comments on the Los Angeles Regional Water Quality Control Board's ("Regional Board") draft Waste Discharge Requirements for Discharges of Groundwater from San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel River and Rio Hondo Watersheds-Los Angeles County General NPDES Permit ("Permit"). As described below, we support the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that important potable water treatment and reuse may resume in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people.

The District is a County Water District formed in 1924 and serves a population of over 8,000 through 2,500 service connections. Our District relies on its well field which pumps water from the Main San Gabriel Basin to meet its customers' needs. The District has been operating a groundwater treatment facility since 1991 and owns the first ground water treatment plant in the nation, designed and constructed to treat for perchlorate, NDMA and VOC's at one location.

Past industrial activities within the San Gabriel Valley have resulted in widespread contamination of the groundwater. The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove

harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects (our District's being one of those) have been responsible for removing more than 60 tons of total contaminants from the groundwater basin since the contamination was discovered in 1979. The WQA recognizes the importance of integrating basin cleanup with water supply needs in addition to the opportunity this presents, and currently some of these projects are stalled. On behalf of the concerned water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treatment plant startups and testing operations. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and allow us to continue serving clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No water will flow to the Pacific Ocean.

WQA and their partners have made great progress in the cleanup of the San Gabriel Basin; however, the current drought that is being experienced throughout the State of California highlights the growing importance of enhancing existing potable water supply. The San Gabriel Basin provides 92% of all the water use in the San Gabriel Valley and also serves as a crucial water source for portions of Orange County and the Central Basin. This Permit will allow local water agencies with ability to utilize wells and treatment plants.

Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they can deliver up to 90,000 acre-feet per year of treated groundwater for potable use. We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg B. Galindo', written in a cursive style.

Greg B. Galindo  
General Manager



June 12, 2014

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

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

Re: General NPDES Permit

Dear Mr. Unger:

Main San Gabriel Basin Watermaster (Watermaster) appreciates the opportunity to submit comments on the Los Angeles Regional Water Quality Control Board's ("Regional Board") draft Waste Discharge Requirements for Discharges of Groundwater from San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel River and Rio Hondo Watersheds-Los Angeles County General NPDES Permit ("Permit"). As described below, we support the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that important potable water treatment and reuse can resume.

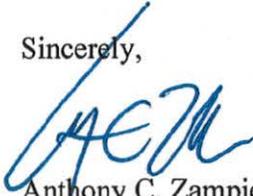
Past industrial activities within the San Gabriel Valley have resulted in widespread contamination of the groundwater. Watermaster is the Court appointed agency that manages and control's pumping for water quality purposes. In that role, Watermaster coordinates an aggressive cleanup program to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water. Watermaster supervised projects have resulted in the removal of more than 60 tons of contaminants from the groundwater basin since it was first discovered in 1979. Watermaster recognizes the importance of integrating basin cleanup with water supply needs, and currently some of these projects are stalled. On behalf of the water entities in the San Gabriel Valley, WQA and Watermaster have developed this Permit to monitor discharges of groundwater associated with groundwater cleanup activities.

Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treatment plant startups and testing operations. Maintaining use of these sources will also help reduce reliance on the Colorado River and the State Water Project. All of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. This Permit is designed to ensure that no water will flow to the Pacific Ocean.

Watermaster and its partners have made great progress in the cleanup of the San Gabriel Basin; however, the current statewide drought highlights the importance of enhancing the existing potable water supply.

We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to allow discharges relating to remediation activities. These activities are essential to a reliable potable water supply in the region.

Sincerely,

A handwritten signature in blue ink, appearing to read 'AZ', is written over the typed name.

Anthony C. Zampielo  
Executive Officer

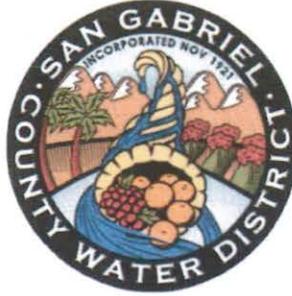
TZ/dd

**DIRECTORS**

MARY CAMMARANO, President  
LARRY TAYLOR, Vice President  
SABINO CICI  
ERIC CHAN  
CHARLES DELATORRE

OFFICE  
8366 GRAND AVENUE  
ROSEMEAD, CA 91770

MAILING  
P.O. BOX 2227  
SAN GABRIEL, CA 91778-2227



**SAN GABRIEL  
COUNTY WATER DISTRICT**

**EXECUTIVE OFFICERS**

**BARBARA A. CARRERA**  
Secretary/General Manager

**JAMES P. PRIOR**  
Assistant General Manager

**CARMEN CORONA**  
Treasurer/Finance & Administration Manager

**LEMIEUX & O'NEILL**  
General Counsel

(626) 287-0341  
FAX (626) 287-8524

[WWW.SGCWD.COM](http://WWW.SGCWD.COM)

June 12, 2014

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

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

Re: General NPDES Permit

Dear Mr. Unger:

San Gabriel County Water District appreciates the opportunity to submit comments on the Los Angeles Regional Water Quality Control Board's ("Regional Board") draft Waste Discharge Requirements for Discharges of Groundwater from San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel River and Rio Hondo Watersheds-Los Angeles County General NPDES Permit ("Permit"). As described below, we support the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that important potable water treatment and reuse may resume in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people.

San Gabriel County Water District ("District") water supply is groundwater. We have six wells, two interconnections and thirteen million gallons of storage.

Past industrial activities within the San Gabriel Valley have resulted in widespread contamination of the groundwater. The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects have been responsible for removing

more than 60 tons of total contaminants from the groundwater basin since the contamination was discovered in 1979. The WQA recognizes the importance of integrating basin cleanup with water supply needs in addition to the opportunity this presents, and currently some of these projects are stalled. On behalf of the concerned water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treatment plant startups and testing operations. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and allow us to continue serving clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No water will flow to the Pacific Ocean.

WQA and their partners have made great progress in the cleanup of the San Gabriel Basin, however, the current drought that is being experienced throughout the State of California highlights the growing importance of enhancing existing potable water supply. The San Gabriel Basin provides 92% of all the water use in the San Gabriel Valley and also serves as a crucial water source for portions of Orange County and the Central Basin. This Permit will allow local water agencies with ability to utilize wells and treatment plants.

Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they can deliver up to 90,000 acre-feet per year of treated groundwater for potable use. We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,



Barbara A. Carrera  
General Manager



City of  
**HUNTINGTON PARK** California

**RENÉ BOBADILLA, P.E.**

CITY MANAGER

June 12, 2014

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

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

Re: General NPDES Permit

Dear Mr. Unger:

The City of Huntington Park appreciates the opportunity to submit comments on the Los Angeles Regional Water Quality Control Board's ("Regional Board") draft Waste Discharge Requirements for Discharges of Groundwater from San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel River and Rio Hondo Watersheds-Los Angeles County General NPDES Permit ("Permit"). As described below, we support the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that important potable water treatment and reuse may resume in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people.

Past industrial activities within the San Gabriel Valley have resulted in widespread contamination of the groundwater. The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects have been responsible for removing more than 60 tons of total contaminants from the groundwater basin since the contamination was discovered in 1979. The WQA recognizes the importance of integrating basin cleanup with water supply needs in addition to the opportunity this presents, and currently some of these projects are stalled. On behalf of the concerned water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

Samuel Unger, Executive Office  
Re: General NPDES Permit  
June 12, 2014  
Page 2

Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treatment plant startups and testing operations. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and allow us to continue serving clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No water will flow to the Pacific Ocean.

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Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they can deliver up to 90,000 acre-feet per year of treated groundwater for potable use. We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,



René Bobadilla  
City Manager



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GENERAL MANAGER/CHIEF ENGINEER

Richard W. Hansen, P.E.

June 12, 2014

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Sent Via Email: [njain@waterboards.ca.gov](mailto:njain@waterboards.ca.gov)

**Re: General NPDES Permit**

Dear Mr. Unger:

The Three Valleys Municipal Water District (TVMWD) is a wholesale member agency of the Metropolitan Water District of Southern California. As a public water agency that treats imported state project water as well as local groundwater supplies, we appreciate the opportunity to submit comments on the Los Angeles Regional Water Quality Control Board's ("Regional Board") draft Waste Discharge Requirements for Discharges of Groundwater from San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel River and Rio Hondo Watersheds-Los Angeles County General NPDES Permit ("Permit"). As described below, we support the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that important potable water treatment and reuse may resume in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people.

Past industrial activities within the San Gabriel Valley have resulted in widespread contamination of the groundwater. The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects have been responsible for removing more than 60 tons of total contaminants from the groundwater basin since the contamination was discovered in 1979. The WQA recognizes the importance of integrating basin cleanup with water supply needs in addition to the opportunity this presents, and currently some of these projects are stalled. On behalf of the concerned water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treatment plant startups and testing operations. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and allow us to continue serving clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No water will flow to the Pacific Ocean.

WQA and their partners have made great progress in the cleanup of the San Gabriel Basin; however, the current drought that is being experienced throughout the State of California highlights the growing importance of enhancing existing potable water supply. The San Gabriel Basin provides 92% of all the water use in the San Gabriel Valley and also serves as a crucial water source for portions of Orange County and the Central Basin. This Permit will allow local water agencies to utilize wells and treatment plants.

Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they can deliver up to 90,000 acre-feet per year of treated groundwater for potable use. We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,



Richard Hansen, P.E.  
General Manager  
Three Valleys Municipal Water District



June 12, 2014



Daniel Liese, Chairman  
Robert Ghirelli, Vice-Chairman  
Curtis Feese, Treasurer  
Wayne Partee, Secretary  
Eugene Jacobs, Director  
Norman Richman, Director  
Ronald Wheeler, Director

P. David Michalko, General Manager  
Barbara Karady, Excc. Administrator

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

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

Re: General NPDES Permit  
Dear Mr. Unger:

Valencia Heights Water Company appreciates the opportunity to submit comments on the Los Angeles Regional Water Quality Control Board's ("Regional Board") draft Waste Discharge Requirements for Discharges of Groundwater from San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel River and Rio Hondo Watersheds-Los Angeles County General NPDES Permit ("Permit"). As described below, we support the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that important potable water treatment and reuse may resume in in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people.

Valencia Heights Water Company has been providing water service to portions of West Covina, Covina and LA County, California, since 1912. Our water system provides clean, safe, and reliable water service in a cost-effective manner to more than 6000 residents.

Past industrial activities within the San Gabriel Valley have resulted in widespread contamination of the groundwater. The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects have been responsible for removing more than 60 tons of total contaminants from the groundwater basin since the contamination was discovered in 1979. The WQA recognizes the importance of integrating basin cleanup with water supply needs in addition to the opportunity this presents, and currently some of these projects are stalled. On behalf of the concerned water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

3009 East Virginia Avenue - West Covina, CA 91791-2252  
(626) 332-8935 - Fax: (626) 332-9441 - email: [info@vhwc.org](mailto:info@vhwc.org)



Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treatment plant startups and testing operations. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and allow us to continue serving clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No water will flow to the Pacific Ocean.

WQA and their partners have made great progress in the cleanup of the San Gabriel Basin, however, the current drought that is being experienced throughout the State of California highlights the growing importance of enhancing existing potable water supply. The San Gabriel Basin provides 92% of all the water use in the San Gabriel Valley and also serves as a crucial water source for portions of Orange County and the Central Basin. This Permit will allow local water agencies with ability to utilize wells and treatment plants.

Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they can deliver up to 90,000 acre-feet per year of treated groundwater for potable use. We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,

A handwritten signature in blue ink, appearing to read "P. David Michalko".

P. David Michalko  
General Manager

# SAN GABRIEL VALLEY WATER COMPANY

June 13, 2014

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

Mr. Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Subject: General NPDES Permit

Dear Mr. Unger:

San Gabriel Valley Water Company ("San Gabriel") appreciates the opportunity to submit comments on the Los Angeles Regional Water Quality Control Board's ("Regional Board") draft Waste Discharge Requirements for Discharges of Groundwater from the San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel and Rio Hondo River Watersheds-Los Angeles County General NPDES Permit ("Permit"). As described below, we support the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that important potable water treatment and reuse may resume in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people who reside in the San Gabriel Valley.

San Gabriel, a public utility engaged in the business of producing, treating, and distributing water to its customers, subject to the jurisdiction of the California Public Utilities Commission, owns and operates six San Gabriel Superfund groundwater remediation treatment facilities within three operable units as well as operating the Whittier Narrows Operable Unit under contract with the United States Environmental Protection Agency and California State Water Resources Control Board.

Past industrial activities within the San Gabriel Valley have resulted in widespread contamination of the groundwater. The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects have been responsible for removing more than 60 tons of total contaminants from the groundwater basin since the contamination was discovered in 1979. The WQA recognizes the importance of integrating basin cleanup with water supply needs. In addition to the opportunity this presents, currently some of these projects are stalled due to the inability to treat the discharge

Mr. Samuel Unger  
Page 2  
January 13, 2014

water to current effluent standards. On behalf of the concerned water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

Under the Permit, water agencies in the San Gabriel and Rio Hondo River Watersheds will conduct short-term, large volume discharges during well drilling, well development, well rehabilitation, and treatment plant startups and testing operations for California Department of Health Services permitting requirements. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and allow us to continue serving clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No discharged water will flow out to the ocean.

WQA and their partners have made great progress in the cleanup of the San Gabriel Basin; however, the current drought that is being experienced throughout the State of California highlights the growing importance of enhancing existing potable water supply. The San Gabriel Basin provides 92% of all the water use in the San Gabriel Valley and also serves as a crucial water source for portions of Orange County and the Central Basin. This Permit will allow local water agencies the ability to utilize existing or new wells and groundwater remediation facilities.

Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment facilities are fully functional they can deliver up to approximately 90,000 acre-feet per year of treated groundwater for potable use. We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region. Thank you.

Very truly yours,



Dan Arrighi  
Water Resources Manager

DA:im



*Enrich the quality of life and economic vitality of the San Gabriel Valley*

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San Gabriel Basin WQA

Thomas Lenz  
Atkinson Andelson Loya Ruud & Romo

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MHI

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City of Hope

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Paul Talbot  
City of Monterey Park

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Cathay Bank

Lupe Valdez  
Union Pacific

David Wigney  
Verizon

June 13, 2014

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4th Street, Suite 200  
Los Angeles, CA 90013

**RE: General NPDES Permit**

Dear Mr. Unger:

On behalf of the San Gabriel Valley Economic Partnership, I am writing in support of the current draft of the Los Angeles Regional Water Quality Control Board's ("Regional Board") Waste Discharge Requirements for Discharges of Groundwater from San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel River and Rio Hondo Watersheds-Los Angeles County General NPDES Permit ("Permit"). The Partnership is a regional business organization committed to enriching the quality of life and improving the economy of the San Gabriel Valley.

In 1979 groundwater contamination was discovered in the San Gabriel Valley. Since then, San Gabriel Basin Water Quality Authority (WQA) cleanup programs have removed more than 60 tons of contaminants. As a result, the San Gabriel Basin remains crucial to the regional potable water supply. It provides 92% of all water used in the San Gabriel Valley.

Approval of the draft Permit will allow WQA projects that have stalled to resume. Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treatment plant startups and testing operations. All water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No water will flow to the Pacific Ocean.

This Permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they can deliver up to 90,000 acre-feet per year. This will ensure a local water supply not dependent on the Colorado River and the State Water Project.



SAN GABRIEL VALLEY  
ECONOMIC PARTNERSHIP

*Enrich the quality of life and economic vitality of the San Gabriel Valley*

We urge the Regional Board to quickly adopt this permit to ensure a dependable supply of water for businesses and residents in the San Gabriel Valley.

Sincerely,



Cynthia J. Kurtz  
President & CEO

CC: San Gabriel Basin Water Quality Authority  
Upper San Gabriel Valley Municipal Water District  
Three Valleys Municipal Water District

# CITY OF MONTEREY PARK

320 West Newmark Avenue • Monterey Park • California 91754-2896  
[www.ci.monterey-park.ca.us](http://www.ci.monterey-park.ca.us)



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**City Council**  
Peter Chan  
Mitchell Ing  
Hans Liang  
Teresa Real Sebastian  
Anthony Wong

**City Clerk**  
Vincent D. Chang

**City Treasurer**  
Joseph Leon

June 16, 2014

Samuel Unger  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

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

Re: General NPDES Permit

Dear Mr. Unger:

The City of Monterey Park appreciates the opportunity to submit comments on the Los Angeles Regional Water Quality Control Board's ("Regional Board") draft Waste Discharge Requirements for Discharges of Groundwater from San Gabriel Valley Groundwater Basin to Surface Waters in Upper San Gabriel River and Rio Hondo Watersheds-Los Angeles County General NPDES Permit ("Permit"). As described below, we support the current draft of the Permit and respectfully request that the Regional Board adopt the Permit as soon as possible so that important potable water treatment and reuse may resume in the San Gabriel Valley. This permit is crucial to the water supply of 1.4 million people.

The City of Monterey Park is home to over 61,000 residents and place of employment for nearly 30,000 workers. The bedroom community is 7.63 square miles with over 10 parks. The City operates its own water system that supplies water to 95 percent of its residents and as such is versed with water quality standards.

Past industrial activities within the San Gabriel Valley have resulted in widespread contamination of the groundwater. The San Gabriel Basin Water Quality Authority ("WQA") is a local agency that helps coordinate aggressive cleanup programs to remove harmful contaminants from the groundwater basin in order to provide safe and reliable drinking water to residents. WQA endorsed projects have been responsible for removing more than 60 tons of total contaminants from the groundwater basin since the contamination was discovered in 1979. The WQA recognizes the importance of

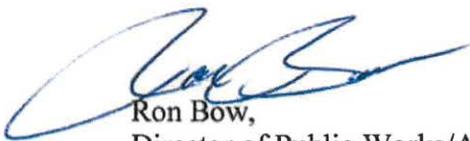
integrating basin cleanup with water supply needs in addition to the opportunity this presents, and currently some of these projects are stalled. On behalf of the concerned water entities in the San Gabriel Valley, WQA requested the development of the Permit to cover discharges of groundwater associated with groundwater cleanup activities.

Under the Permit, water agencies in the San Gabriel and Rio Hondo Watersheds will conduct short-term, large volume discharges during well drilling, well development, redevelopment and treatment plant startups and testing operations. Once the treatment plants are commissioned they will remove harmful contaminants from the Basin and allow us to continue serving clean potable water. It will also help reduce reliance on the Colorado River and the State Water Project. Importantly, all of the water discharged under this Permit will be infiltrated back into the San Gabriel Valley groundwater basin for reuse. No water will flow to the Pacific Ocean.

WQA and their partners have made great progress in the cleanup of the San Gabriel Basin, however, the current drought that is being experienced throughout the State of California highlights the growing importance of enhancing existing potable water supply. The San Gabriel Basin provides 92% of all the water use in the San Gabriel Valley and also serves as a crucial water source for portions of Orange County and the Central Basin. This Permit will allow local water agencies with ability to utilize wells and treatment plants.

Notably, this permit alone will result in the reuse and replenishment of approximately 6,000 acre-feet of San Gabriel Valley Basin groundwater. Once the treatment systems are fully functional they can deliver up to 90,000 acre-feet per year of treated groundwater for potable use. We appreciate the Regional Board's efforts and wish to communicate our support of the issuance of the Permit to facilitate groundwater remediation activities, which are vital for continued reliable potable water supply in the region.

Sincerely,



Ron Bow,  
Director of Public Works/Assistant City Manager