

**Responsiveness Summary – Basin Plan Amendment to subdivide Reach 4 of the Santa Clara River into two reaches
Comment Due Date: October 11, 2007**

1	Ventura County Agricultural Water Quality Coalition - (VCAWQC)
2	Newhall Land and Farming Company - (Newhall)
3	Castaic Lake Water Agency - (Castaic)
4	City of Santa Clarita - (Santa Clarita)
5	United Water Conservation District - (United Water)
6	Valencia Water Company - (Valencia)

No.	Author	Date	Comment	Response
1.1	VCAWQC	10/10/07	The rationale for re-defining Reach 4 into 4A and 4B mirrors that of the 1994 Basin Plan in splitting Lang-West Pier Highway 99 reach into two reaches (Reaches 6 & 7). The Coalition agrees with the Board staff findings that dividing Reach. 4 into two separate reaches would better reflect hydrogeologic conditions and would better reflect water quality differences between the east and west Piru sub-basin. The Coalition also agrees that this action will allow consideration of several alternatives for Site Specific Objectives (SSOs), rather than a single objective for Reach 4.	Comment acknowledged.
1.2	VCAWQC	10/10/07	While the revised reaches would better coincide with the underlying groundwater basins, the WQO of 200 mg/L set over 40 years ago for chloride in the eastern Piru Sub-basin groundwater no longer accurately represents current conditions. The WQO of 200 mg/L in the eastern Piru Sub-basin was set at twice as high as that of the western Pint Sub-basin due to the historical presence of the oil industry discharging brine in the east Piru area in the 1950s and	Staff noted that the current chloride Objective of 200 mg/L was set due to historical brine discharge contamination. With time the chloride concentration in the eastern Piru Basin has dropped since the brine discharge stopped. A new chloride objective for the eastern

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			<p>1960s. Today, the oil industry is no longer prominent and brine discharge into the Santa Clara River has ceased.</p> <p>According to the United Water Conservation District's (UWCD) 2006 report, groundwater quality subsequently improved with chloride in most of the Piru basin ranging from 30 to 65 mg/L. However, since 1999, chloride in the eastern Piru Sub-basin has increased from 80-100 mg/L to as high as 176 mg/L. This has been attributed to increased chloride being discharged in wastewater upstream from Saugus and Valencia Water Reclamation Plants. Based on their study, UWCD has also asserted that the WQO for chloride in the eastern Piru Basin groundwater needs to be revised downward to 100 mg/L.</p> <p>The Coalition, too, encourages the Regional Board to lower the WQO for chloride in the eastern Piru Basin groundwater in order to ensure the protection of water quality for beneficial uses of groundwater in the Piru Sub-basin, including agricultural and many other beneficial users. The Coalition believes the Regional Board is doing the right thing in redefining Reach 4 to better reflect hydrogeological conditions and water quality differences between the east and west Piru sub-basins. The Coalition also supports the Regional Board's effort to set a more appropriate standard for chloride in the eastern Pint Basin groundwater.</p>	<p>Piru Basin may need to be considered to ensure protection of the Piru Basin against degradation from upstream sources. Staff will discuss this alternative as well as how and when site specific objectives are considered in May 2008.</p>
2.1	Newhall	10/10/07	We believe WP#1 makes recommendations that make	Comment acknowledged.

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			<p>sense and are technically accurate based on relevant local information. The primary recommendation is to split SCR Reach 4 into Reaches 4A and 4B at Piru Creek. This split is reasonable and well supported technically and administratively.</p> <p>First, this split of surface water reaches is consistent with the groundwater basin boundaries in the Basin Plan, which identify different Basin Plan Objectives for the Piru Basin west and east of Piru Creek. This groundwater basin boundary is relevant to the surface water reach boundary since there is significant groundwater-surface water interaction in these reaches, and therefore both surface water flow and chemistry are highly influenced by underlying groundwater basin boundaries.</p> <p>Second, this split would better reflect water quality conditions in the SCR that change at Piru Creek. Water quality in the SCR at this location is highly-influenced by flows from Piru Creek (including regular releases from Piru Dam) as well as by rising groundwater in proposed Reach 4A.</p> <p>Third, this split would better reflect hydrologic conditions in the SCR which change significantly at Piru Creek due to the regular release of water from Piru Dam and the resurfacing of groundwater at the downstream end of the "dry gap". The SCR dry gap is created by surface water flows infiltrating to groundwater in the eastern portion of Reach 4B. Rising groundwater then resurfaces in the</p>	

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			<p>middle of Reach 4A due to unique geologic conditions that cause the aquifer to pinch and narrow in this area.</p> <p>Finally, this administrative change may help allow for creative, out-of-the-box water management solutions to address salt and other issues in the SCR watershed, as part of the USCR Chloride TMDL collaborative stakeholder process.</p>	
3.1	Castaic	10/8/07	<p>CLWA is the wholesale water supplier for the Santa Clarita Valley. As a stakeholder within the Santa Clara River Watershed, CLWA has been an active member of the Upper Santa Clara River Chloride Total Maximum Daily Load (TMDL) Collaborative Process. CLWA agrees with Regional Board staff that subdividing Reach 4 of the River into two separate reaches better reflects the unique conditions in this stretch of the River. CLWA also believes that the subdivision of Reach 4 would better facilitate development of site-specific objectives for the Upper Santa Clara River chloride TMDL and allow greater flexibility to pursue potential alternative solutions that are being considered by the various stakeholders.</p>	Comment acknowledged.
4.1	Santa Clarita	10/11/07	<p>The City is an active stakeholder within the Santa Clara River Watershed on many issues, including the Upper Santa Clara River Chloride Total Maximum Daily Load (TMDL) Collaborative Process. The City agrees with Regional Board staff that subdividing Reach 4 of the Santa Clara River into two separate reaches better reflects the unique</p>	Comment acknowledged.

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			<p>conditions in our watershed. City staff also believes the subdivision would better facilitate the development of site-specific objectives for the Upper Santa Clara River Chloride TMDL. Developing the site-specific objectives will allow greater flexibility to pursue a variety of compliance solutions that are being considered by stakeholders,</p> <p>The City supports a cost-effective TMDL solution that also protects all beneficial uses. We encourage the Regional Board to continue supporting win-win solutions supported by the stakeholders.</p>	
5.1	United Water	10/11/07	<p>We find that the Staff Report fails to provide convincing arguments to justify the division of a small groundwater basin into two reaches, based on the fact that the water quality of surface water recharging the basin in the east differs from the water quality of groundwater discharging from the basin in the west.</p>	<p>The division of Reach 4 of the Santa Clara River is for surface water body, not for groundwater basins. The Piru groundwater basin was divided into eastern and western sub-basins and was set for different groundwater objectives previously. The Reach 4 division coincides with the underlying groundwater basins that were divided previously.</p>
5.2	United Water	10/11/07	<p>Since 1999 wastewater discharges from the Valencia water reclamation plant in Los Angeles County have increased dramatically in both volume and chloride concentration. These discharges continue to degrade the water quality of the Santa Clara River in Reaches 4 and 5. Soon after this</p>	<p>Comment acknowledged.</p>

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			<p>water flows into Ventura County, the entire flow of the river commonly percolates and recharges the eastern portion of the Piru groundwater basin. This occurrence is thoroughly documented in the Staff Report. The chloride degradation of surface waters in Reach 5 and the associated groundwater degradation in the eastern Piru groundwater basin has been well-documented by the monitoring of surface water and wells. Considerable effort has now been invested in construction of the GSWIM model as part of the Upper Santa Clara River Chloride TMDL, in order to better assess and predict the long-term impacts of various wastewater treatment and disposal options in the Santa Clara River valley.</p> <p>United definitely agrees with the Regional Board staff assessment that recent and historical water quality degradation in the eastern Piru groundwater basin is related to the recharge of poor quality surface waters entering the basin.</p>	
5.3	United Water	10/11/07	<p>Efforts are underway to remove the agriculture beneficial use designation in Reach 5. The likely next step would be a relaxation of the chloride objective for Reach 5. Surface water from Reach 5 is the primary source of recharge for the groundwater of the eastern Piru basin. This area is the proposed Reach 4B, where agriculture is the likely long-term land use. United questions how the existing agricultural use in eastern Piru will be protected if the chloride objective is relaxed in the surface water reach located immediately upstream. Diversion of surface water</p>	<p>Staff notes that reaches 5 and 6 are upstream of reach 4, and water quality in these reaches affects chloride loading to reach 4. However, this item does not revise water quality objectives in any of the relevant reaches. Water quality objectives will only be proposed after all of the special studies are completed. Degradation of water</p>

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			and the pumping of local groundwater are the only available sources of agricultural water supply in the Piru groundwater basin.	<p>quality and beneficial uses will be considered in any proposed revisions to the water quality objective or adoption of site-specific objectives.</p> <p>Regional Board staff understands that the proposed Reach 4B needs to be assigned a chloride objective that is fully protective to the existing agricultural use in eastern Piru. Implementation options are being investigated and compliance measures will be selected to insure that agricultural use in eastern Piru will be protected.</p>
5.4	United Water	10/11/07	As noted in the Staff Report, UWCD maintains that the existing groundwater objective for chloride in eastern Piru is based on historical contamination from the improper disposal of oilfield brines. This groundwater objective should be adjusted to a level protective of agricultural use, the existing and foreseeable land use for this portion of the Piru basin.	Comment is responded as in 1.2.

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5.5	United Water	10/11/07	United notes that the historical division of the upper and lower Santa Clara River watershed has consistently been at Blue Cut, near the Los Angeles/ Ventura County line. At this point there is a distinct groundwater divide, a political boundary exists, and east of this point the watershed become increasingly arid. DWR's 1993 Investigation of Water Quality and Beneficial Uses, Upper Santa Clara River Hydrologic Area, conducted on behalf of the Los Angeles RWQCB, does not consider areas downstream of Blue Cut. GSWIM model was extended downstream to Fillmore in order to assess chloride impacts to agricultural areas in Ventura County. We do not feel it is proper to consider the Piru basin ("areas east of the City of Fillmore") part of the Upper Santa Clara River, as suggested in the Staff Report (page 12).	Staff will revise the Staff Report accordingly.
5.6	United Water	10/11/07	The Staff Report significantly understates the design capacity of the Valencia plant (12.6 MGD on page 15). The current design capacity is 21.6 MGD, and this plant commonly discharges 14 to 17 MGD to the Santa Clara River.	Staff will revise the Staff Report accordingly.
5.7	United Water	10/11/07	The Staff Report's flow characterizations for Piru Creek (page 15) appear to overstate flows in Piru Creek. This may be due to the inclusion of water flowing over the spillway of Santa Felicia dam in very wet winters, when much of this water flows across the Piru basin and on to the ocean. United does indeed release water continuously from the Lake Piru, and in recent years these flows have averaged about five cfs, and are intended to maintain fish habitat below the dam. United's conservation releases are typically conducted in the late summer or fall of the year, and release volumes and flow rates vary year-to-year. Release rates commonly	Staff will revise the Staff Report accordingly.

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			range from 200 to 500 cfs, and releases may range from one to twelve weeks in duration.	
5.8	United Water	10/11/07	However, we are concerned that the division of Reach 4 above and below Piru Creek is a step in the direction of allowing recent groundwater contamination to continue.	The proposed reach division will allow the special studies to focus on evaluation of site specific objectives based on a more accurate description of the Upper Santa Clara River than is currently available under the existing reach definition. This Basin Plan Amendment to divide Reach 4 into two reaches is the first of several subsequent administrative actions that the Regional Board may consider to implement the TMDL after the results of the special studies are available. The results of special studies will help the Regional Board evaluate the potential to establish site specific objectives that are fully protective to all beneficial uses.
6.1	Valencia	10/9/07	As a stakeholder within the Santa Clara River Watershed, Valencia has been an active member of the Upper Santa	Comment acknowledged.

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			Clara River Chloride Total Maximum Daily Load (TMDL) Collaborative Process. Valencia agrees with Regional Board staff that subdividing Reach 4 of the Santa Clara River into two separate reaches better reflects the unique conditions. Valencia also believes that the subdivision of Reach 4 would better facilitate the development of site-specific objectives for the Upper Santa Clara River Chloride TMDL and allow greater flexibility to pursue potential alternative solutions that are being considered by the various stakeholders.	