

Comment Summary and Responses
Incorporation of Stakeholder-Developed Groundwater Quality Management Measures for Salts and Nutrients in the Lower Santa Clara River Basins

Table 1: Commenters

1. Ventura County Public Works Agency Watershed Protection District; Cities of Ventura, Santa Paula, and Fillmore; Ventura County Water Works District 16; United Water Conservation District; and the Ventura County Agricultural Irrigated Lands Group (collectively, Lower Santa Clara River (LSCR) Basin Stakeholders)
2. County Sanitation Districts of Los Angeles County

Table 2: Comments and Responses

No.	Commenter	Comment	Response
1.1	Lower Santa Clara River (LSCR) Basin Stakeholders	The Ventura County Public Works Agency Watershed Protection District; Cities of Ventura, Santa Paula, and Fillmore; Ventura County Water Works District 16; United Water Conservation District; and the Ventura County Agricultural Irrigated Lands Group (collectively Stakeholders) appreciate the opportunity to provide comments on the incorporation of the Lower Santa Clara Salt and Nutrient Management Plan (LSCR SNMP) into the Water Quality Control Plan for the Los Angeles Region (Basin Plan).	Comment noted.
1.2	LSCR Basin Stakeholders	The Stakeholders worked closely together to develop a SNMP that reflects the unique characteristics and status of recycled water planning in the LSCR basins. The Stakeholders developed the plan to achieve the goal of protecting, conserving, and augmenting water supplies to improve water	Comment noted.

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		supply reliability in the planning area. As municipal and agricultural users in the LSCR rely heavily on the use of groundwater for water supply, the Stakeholders feel the plan will support sustainable use of this important resource into the future.	
1.3	LSCR Basin Stakeholders	The Stakeholders appreciate the feedback, support, and participation of Regional Water Board staff during the development of the SNMP. We have reviewed and support the <i>Proposed Amendment to the Water Quality Control Plan for the Los Angeles Region to Incorporate Salt and Nutrient Management Measures for the Lower Santa Clara River Basin</i> (Proposed Basin Plan Amendment). We feel the Proposed Basin Plan Amendment provides a good representation of the contents of the SNMP.	Comment noted.
1.4	LSCR Basin Stakeholders	While the Basin Plan Amendment provides a good representation of the SNMP, we have identified a few locations within the SNMP where we feel modifications would better reflect the process for project evaluation outlined in the SNMP. The development of recycled water projects in the LSCR SNMP is a dynamic process that will evolve over the planning period. All of the wastewater agencies have a goal of maximizing the beneficial reuse of their wastewater over time. So while the specific details of many of the projects are still being defined, the intention of the SNMP was to provide a framework	The Board has reviewed and considered the modifications proposed by the commenter and agrees that, for the most part, they provide a better reflection of the process for project evaluation that is outlined in the stakeholder-developed Salt and Nutrient Management Plan. Revisions have been made to the proposed Basin Plan language and tentative resolution as outlined in the response to the suggested revisions below.

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		<p>that will facilitate the permitting of projects that meet conditions outlined in the SNMP. The attachment to this letter outlines suggested modifications to better capture this intention and the process that will be utilized to evaluate projects in the planning area.</p>	
1.5	LSCR Basin Stakeholders	<p>On page 17 in the last sentence of the first paragraph, the language states "where necessary, from advanced treatment of wastewater effluent by reverse osmosis." This sentence should be revised to refer to the process outlined in the SNMP for determining when additional control measures are needed and acknowledge that reverse osmosis or other control measures could be implemented.</p> <p>Following are suggested edits for this sentence.</p> <p>Further reductions in effluent chloride concentrations are expected <u>to occur through future source control efforts, including from the removal of existing water softeners in the SNMP planning area through a rebate program and, where necessary if found to be necessary using the procedures outlined in Section 9 of the LSCR SNMP, from implementation of additional control measures. Including consideration of advanced treatment of wastewater</u></p>	<p>The proposed Basin Plan language on page 17 has been revised as follows:</p> <p>Further reductions in effluent chloride concentrations are expected <u>to occur through future source control efforts, including from the removal of existing water softeners in the SNMP planning area through a rebate program, and, where necessary¹, from <u>additional control measures which may include advanced treatment of wastewater effluent by reverse osmosis.</u></u></p> <p>(Please note added footnote.)</p>

¹ As determined using the procedures outlined in Section 9 of the Lower Santa Clara River Basin Salt and Nutrient Management Plan.

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		effluent by reverse osmosis.	
1.6	LSCR Basin Stakeholders	<p>On page 17, please add the following sentence to the end of the second paragraph to explain that the listed projects are currently being considered, but other projects may be defined that would be evaluated using the procedures outlined in the SNMP.</p> <p><u>Additional projects may be defined or the projects identified in the table may be modified during implementation. The procedures outlined in Section 9 of the LSCR SNMP will be used to evaluate additional or modified recycled water projects as they are developed.</u></p>	<p>The proposed Basin Plan language has been revised with the suggested language with a footnote referenced at the end of the second paragraph on page 17 as follows:</p> <p>These projects, most of which are in the early planning stages, are presented in Table 8.2-5B².</p> <p>(Please note added footnote.)</p>
1.7	LSCR Basin Stakeholders	<p>On page 20, please add the following sentences before the last sentence in the first paragraph to clarify the purpose of the project scenarios.</p> <p><u>While a number of projects are currently in the planning stages, the potential exists for agencies to maximize recycling of all current and future effluent flows up to the design capacities of the treatment plants. The project scenarios were developed to reflect the full range of potential recycled water use,</u></p>	<p>The suggested language has been added as follows:</p> <p><u>A number of these projects are currently in the planning stages, and the potential exists for agencies to maximize recycling of all current and future effluent flows up to the design capacities of the treatment plants. These project scenarios were developed to reflect the full range of potential recycled water use,</u></p>

² The projects listed in this table may be modified during implementation, and/or additional projects may be identified. The procedures outline in Section 9 of the Lower Santa Clara River Basin Salt and Nutrient Management Plan will be used to evaluate modified or additional recycled water projects as they are developed.

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		<u>including both planned and potential future projects.</u>	<u>including both planned and potential future projects.</u> Results of this analysis are presented in Table 8.2-6B.
1.8	LSCR Basin Stakeholders	<p>On page 21, please modify the last sentence of the first paragraph as follows:</p> <p>The LSCR Basins SNMP includes a menu of further management measures that could be implemented to manage salts and nutrients on a sustainable basis <u>if determined to be necessary based on the evaluation outlined in Section 9 of the SNMP in such cases.</u> (Table 8.2-6c).</p>	<p>The proposed Basin Plan language on page 21 has been revised as follows:</p> <p>The LSCR Basins SNMP includes a menu of further management measures that could be implemented, <u>as needed</u>³, to manage salts and nutrients on a sustainable basis in such cases (Table 8.2-6c). (Please note added footnote.)</p>
1.9	LSCR Basin Stakeholders	<p>On page 30, please delete number (iii) {at the end of the planning horizon (i.e. 2025)}, in the paragraph under the heading Updates to the Salt and Nutrient Management Measures and replace with the text below. Because the SNMP presents a framework for evaluating projects and a menu of management measures, updating the measures is not necessary on a specified time period, but rather if conditions or proposed projects change.</p> <p><u>(iii) if needed to address additional or modified recycled water projects.</u></p>	<p>The purpose of the review of SNMP components after 10 years (i.e. in 2025) is to assess the effectiveness of the salt and nutrient management measures contained within. This periodic review also allows for the consideration and/or incorporation of updated basin-specific data and information, obtained during this period that may be used to refine model assumptions and/or streamline management measures. The review could also result in no changes to the SNMP. Finally, an update at the end of the planning horizon will</p>

³ As determined using the procedures outlined in Section 9 of the Lower Santa Clara River Basin Salt and Nutrient Management Plan.

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			only be necessary if one was not deemed necessary as a result of changing conditions or monitoring results before then. The language referred to will be retained as it will ensure that salt and nutrient management within a basin will be based on current information/conditions. However, the suggested replacement language will be added to the list of conditions that may trigger an update to the SNMP.
1.10	LSCR Basin Stakeholders	In the Tentative Resolution, on page 4, item 17, please delete the following language in the first sentence: address elevated levels of salts and nutrients in localized areas. While the plan will prevent additional salt loading in areas with elevated levels, it is not designed to remediate those locations. Additionally, some of the locations with elevated salts and nutrients are a result of natural conditions that cannot be addressed by the stakeholders.	The tentative resolution language in Finding 17, and similar language on page 30 of the proposed Basin Plan amendment have been revised as follows: The proposed management strategies for salt and nutrients are designed to maintain current water quality conditions in the groundwater basins, address <u>prevent additional loading in localized areas with</u> elevated levels of salts and nutrients in localized areas , and manage additional loads from future recycled water projects in a manner that is protective of beneficial uses.
1.11	LSCR Basin Stakeholders	Finally, we have received a late comment on the SNMP document and propose to make the following change to Page 9-22, Section 9.3, second paragraph to address the comment.	Staff has accepted the revised Section 9 containing the modified language and will make it available to interested persons along with the other proposed revisions.

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		<p>For Piru, the analysis assumes implementation of projects by the Los Angeles County Sanitation Districts to reduce chloride <u>concentrations in the discharge from the Valencia and Saugus WRPs to meet applicable effluent limitations</u> will result in concentrations at or below 100 mg/L as a three month, flow weighted average at the County line will occur by 2019.</p>	
2.1	Sanitation Districts of Los Angeles County	<p>The Santa Clarita Valley Sanitation District of Los Angeles County (District) would like to thank the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) for the opportunity to provide comments on the incorporation of salt and nutrient management measures for the Lower Santa Clara River Basin. The District owns and operates the Valencia and Saugus Water Reclamation Plants (WRPs), which provide tertiary treatment to produce high quality recycled water that is reused or discharged to the Upper Santa Clara River.</p>	Comment noted.
2.2	Sanitation Districts of Los Angeles County	<p>The District's Valencia and Saugus WRPs must comply with Waste Load Allocations described in the revised Upper Santa Clara River TMDL (USCR TMDL) that was approved earlier this year. The USCR TMDL requires that the Valencia and Saugus WRPs meet a chloride objective of 100 mg/L as a 3-month, flow-</p>	<p>The commenter discussed the proposed language modifications with the LSCR Basin SNMP stakeholders and agreed on revised language as presented in Comment No. 1.11 and its corresponding response.</p>

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		<p>weighted average of the discharge from both plants. The Lower Santa Clara River Salt and Nutrient Management Plan (LSCR SNMP) includes a reference to the District's chloride compliance project and USCR TMDL requirements, which are incorrectly described. Therefore, we respectfully request that the following change be made to <i>Section 9 Implementation Measures to Manage Salt and Nutrient Loading in the Groundwater Basin on a Sustainable Basis</i> of the LSCR SNMP: Page 9-22, Section 9.3, second paragraph</p> <p>"For Piru, the analysis assumes implementation of projects by the Los Angeles County Sanitation Districts to reduce chloride concentrations to at or below 100 mg/L as a <u>three month, flow weighted average of the discharge from the Valencia and Saugus WRPs at the County line will occur</u> by 2019."</p>	