



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE  
Chief Engineer and General Manager

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File No. 31-370-40.4A

***VIA ELECTRONIC MAIL***

California Regional Water Quality Control Board  
Los Angeles Region  
Attn: Dr. Ginachi Amah  
320 West Fourth Street, Suite 200  
Los Angeles, CA 90013

Dear Dr. Amah:

**Comment Letter – Incorporation of Salt and Nutrient  
Management Measures for the Main San Gabriel Basin**

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciates the opportunity to comment on the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) proposed amendment to the Basin Plan that would incorporate stakeholder-proposed control measures for salts and nutrients in the Main San Gabriel Basin (Basin). The Sanitation Districts strongly supports the Regional Board's efforts to increase recycled water use while protecting water quality and supports approval of these amendments to the Basin Plan, with the inclusion of our recommendations below. These amendments will allow for additional recycled water to be used in the Basin, helping to ensure a reliable supply of water for the region.

While this salt and nutrient management plan (SNMP) focuses on one large recycled water project, the Upper San Gabriel Valley Municipal Water District's Indirect Reuse Replenishment Project (IRRP), there are other smaller irrigation projects currently using recycled water in the Basin with the potential for this use to expand or for water quality changes to occur. The SNMP analysis determined that these smaller recycled water irrigation projects contribute a de minimis amount to the overall recharge volumes and loadings into the Basin<sup>1</sup> and, therefore, were not included in the future assimilative capacity analysis. However, this SNMP analysis was not intended to limit the expansion of recycled water irrigation projects or the existing use of recycled water in the event of increasing salt concentrations due to conditions including the drought. Hence, language should be incorporated into the SNMP and associated documents to clarify that any changes in recycled water quantity or quality in relation to irrigation projects would not have a significant impact to the salt and nutrient loading to the Basin. In addition, the two editorial comments attached are recommended to be incorporated into the applicable documents.

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<sup>1</sup> Return flows from the direct use of recycled water for irrigation from the Whittier Narrows and San Jose Creek Water Reclamation Plants were estimated to contribute 0.08% of the overall annual recharge to the Basin and 0.1% and 0.2% of the overall annual loading of total dissolved solids and chloride, respectively, to the Basin.

We would like to commend Regional Board staff for their support and work on this effort and look forward to continuing this collaboration during the development of other SNMPs. If you have any questions concerning this letter or need additional information, please contact Monica Gasca at (562) 908-4288, extension 2838.

Very truly yours,



Andrew J. Hall  
Supervising Engineer  
Technical Services Department

AJH:MG:ep  
Enclosures

cc: Anthony Zampello, Main San Gabriel Basin Watermaster  
Kelly Gardner, Main San Gabriel Basin Watermaster  
Shane Chapman, Upper San Gabriel Valley Municipal Water District

## Attachment A

### Proposed Basin Plan Amendment

#### *No Project Scenario (page 19)*

The following edit clarifies that the No Project Scenario evaluates current conditions, including existing recycled projects in the Basin, and does not include proposed future recycled water projects:

“An evaluation of the compiled historical water data for the period 1973-74 to 2010-11 was conducted to project future groundwater quality assuming no hypothetical scenarios or **additional** recycled water projects are implemented...”

### Draft Substitute Environmental Document (SED)

#### *Section V.1.2. Alternative 2: Planned Recycled Water Projects*

The following edit clarifies that there are other existing, or potentially planned, recycled water projects, specifically smaller recycled water irrigation projects, in the Basin:

...The IRRP is the only recycled water **recharge** project **and the largest overall recycled water project** currently planned for the Main Basin; therefore, it was evaluated specifically in the anti-degradation analysis in the SNMP...