

10-13-16

Los Angeles Regional Water Quality Control Board
321 W. 4th. St. Suite 200
Los Angeles, CA 90013

Via email to: Ginachi.Amah@waterboards.ca.gov

Re: COMMENTS ON PROPOSED AMENDMENTS TO THE BASIN PLAN TO
INCORPORATE A PROGRAM OF IMPLEMENTATION CONSISTING OF
STAKEHOLDER-DEVELOPED GROUNDWATER QUALITY MANAGEMENT
MEASURES FOR SALT AND NUTRIENTS IN THE UPPER SANTA CLARA
RIVER BASIN

Dear Ginachi Amah:

We understand the need to begin a monitoring and management program to ensure that the build up of unwanted pollutants including chlorides, nitrates and sulfates does not increase substantially as our community moves to include more recycled water in our supply mix.

Our comments represent only factual inaccuracies in the Plan which can be addressed in the final document.

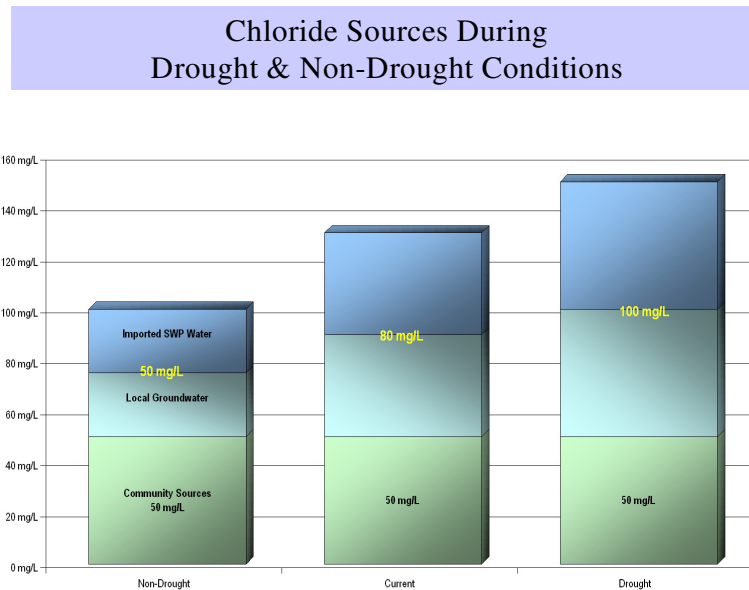
Salt and Nutrient Management Plan Measures for the Upper Santa Clara River Basin

Page 19 – Removal of self-regenerating water softeners. While this was the goal, we note that many such softeners must continue to exist since salt for that system is still being sold by local retailers.

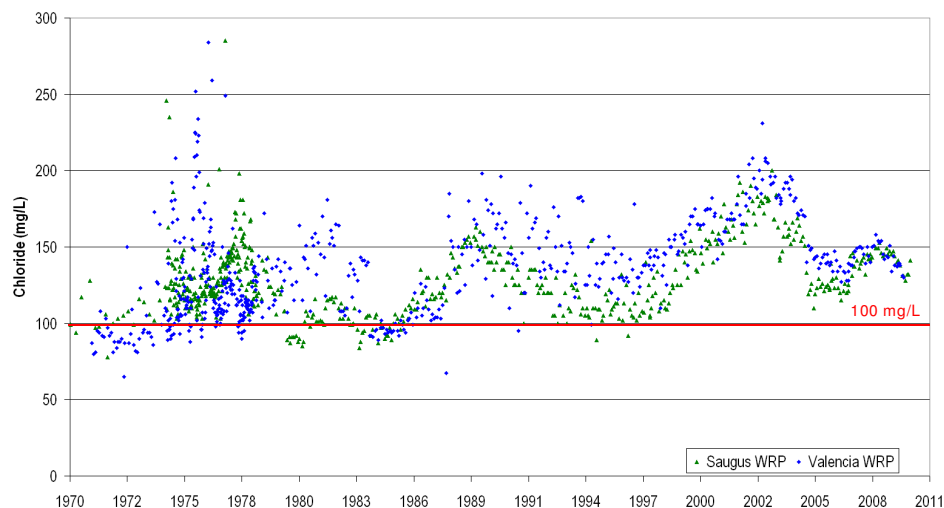
Page 20 – “Other methods of salt reduction have included a pilot water softening treatment for drinking water for the VWC service area. This system precipitates out ions of magnesium and other salts. The objective of the program is to encourage individual home owners to not install, or to remove existing SRWSs” This system has been off line for several years due to problems that arose. It has not been returned to service as of this date.

“In addition, imported water is normally blended with groundwater supplies to reduce hardness. The relatively low TDS, chloride and nitrate concentrations in the imported water, particularly during wet years, results in lower salts and nutrient concentrations in supplied water than would occur if only local sources were used.”

This is an inaccurate statement since state water is often higher in chlorides than local ground water. State water is especially high in chlorides during periods of drought that affect the San Joaquin Delta. The two charts below from a presentation made by the Los Angeles County Sanitation Districts, illustrate the loading of chlorides in state water.



Chloride in SCVSD Discharges



Page 25 “Additional conceptual implementation measures include groundwater recharge in the Saugus Formation using State Water Project water during wet years with recovery during dry years, and a proposed brine line in the lower sections of the Santa Clara River Valley that could be extended to Los Angeles County.” The Saugus Aquifer currently is seriously polluted by

ammonium perchlorate from the Whittiker Bermite Industrial site. Many drinking water wells have been closed due to this problem, with only a few being re-opened after expensive water treatment facilities were added (Saugus well 1 and 2). While clean up of the soil may be completed by 2018, ground water cleanup is not estimated to be complicated for over 40 years. It is therefore highly unlikely that this aquifer will be used for re-charge during this period.

A brine line was discussed in relation to a solution to the high chloride levels in the effluent from the Sanitation plants. There was considerable resistance from downstream property owners to a line that would extend to Ventura County as well as an extremely high cost for such a line. There was also discussion of a line through Los Angeles County, but again the cost of such a long line was considered to make the project infeasible.

At this time, aquifer re-charge and brine line should therefore not be considered as a means of reducing salt loads at this time or in the near future.

Monitoring Program

We support the monitoring program but ask that the reviewing agency be identified and be a neutral party.

Resolution

The Resolution for this Amendment states that salt loading from recycled water may cause an exceedance of the groundwater Quality Objectives for these pollutants. We would like to know how the Plan will address this problem when it arises. The management tools presented in the plan do not seem sufficient to manage increased loads.

This concludes our comments. Thank you for your time.

Sincerely,

A handwritten signature in cursive script, appearing to read "Raymond O. Plumb".

President