



January 17, 2017

Via email: commentletters@waterboards.ca.gov

The Honorable Felicia Marcus and Members of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814

RE: Comment Letter – Proposed Approval of an Amendment to the Water Quality Control Plan for the Los Angeles Region (Basin Plan) to Establish an Implementation Plan for the Malibu Creek Nutrients TMDL and the Malibu Creek and Lagoon TMDL for Sedimentation and Nutrients to Address Benthic Community Impairments

Dear Chair Marcus and Members of the Board:

The Las Virgenes – Triunfo Joint Powers Authority (JPA) appreciates the opportunity to comment on the proposed approval of the subject amendment to the Basin Plan. The JPA worked extensively with staff at the Los Angeles Regional Board during development of the Implementation Plan, supports their efforts and recommends approval of the proposed Basin Plan Amendment.

The JPA and Regional Board staff developed mutually agreeable conditions in the Implementation Plan, which the JPA feels are reasonable and achievable. The JPA is committed to the continued stewardship of the Malibu Creek Watershed and shares the State's goals to protect in-stream biology and habitat. As part of this commitment, the JPA has already initiated a program to achieve significant additional nutrient reductions through the construction of an advanced water treatment facility. The ambitious program is the culmination of an eighteen-month stakeholder process to identify and evaluate alternatives to minimize discharges into Malibu Creek. The facility will enable indirect potable reuse of the excess recycled water from the Tapia Water Reclamation Facility. A significant effort is required, including an estimated investment of \$95 million. When completed, the JPA will be one of the first water agencies in the state to implement indirect potable reuse through reservoir augmentation, which will protect in-stream habitat and advance the prudent use of California's limited water supply.

The success of this program is largely dependent upon public acceptance, which the JPA is confident can be achieved within the thirteen and a half years specified in the Implementation Plan. While the JPA is confident that this time frame provides enough time to both address the complex challenges of building an advanced water treatment facility and gain public acceptance, it is still an extremely tight time frame. This was recognized by Regional Board staff during discussions on the Draft Implementation Plan when the time frame was extended from ten years. The JPA appreciates the Regional Board's willingness to provide adequate time to ensure program success. The attached timeline highlights the tasks to be completed in the period provided.

The JPA is committed to minimizing nutrient discharges to Malibu Creek and we look forward to continuing to work with Regional Board staff to protect water quality and natural resources in the watershed.

Thank you again for the opportunity to provide comments.

Sincerely,

David W. Pedersen, P.E.
Administering Agent/General Manager

Attachment: Las Virgenes-Triunfo Joint Powers Authority Indirect Potable Reuse Program Schedule

Las Virgenes-Triunfo Joint Powers Authority

Indirect Potable Reuse Program Schedule

1	2	3	4	5	6	7	8	9	10	11	12	13			
<u>Years 1 - 5</u> Public Outreach and Acceptance Design and Construct Demonstration Project Regulatory Compliance (SWRCB, DDW, RWQCB) Pre-Design CEQA/NEPA Analysis Land Acquisition Financing and Funding Brine Disposal Agreement					<u>Years 6 - 8</u> Public Outreach and Acceptance Final Design Equipment Procurement Construction Permitting			<u>Years 9 - 11 ½</u> Public Outreach and Acceptance Construction of: Advanced Water Treatment Facility Pipelines Brine Line Reservoir Mixing Facilities				<u>Years 11 ½ - 13 ½</u> Public Outreach Start-up Regulatory Compliance			