

Comment Summary and Responses
Incorporation of Stakeholder-Developed Groundwater Quality Management Measures for Salts and Nutrients in the Main San Gabriel Groundwater Basin

Table 1: Commenters

1. County Sanitation Districts of Los Angeles County (LACSD)
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Table 2: Comments and Responses

No.	Commenter	Comment	Response
1.1	County Sanitation Districts of Los Angeles County (LACSD)	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.	Comment noted.
1.2	LACSD	While this salt and nutrient management plan (SNMP) focuses on one large recycled water	Regional Board staff contacted the commenter for further clarification of this

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		<p>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 and, therefore, were not included in the future assimilative capacity analysis.</p> <p>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.</p>	<p>comment on November 15, 2016.</p> <p>The commenter expressed concern that the SNMP may not sufficiently convey that the scenarios considered in projecting use of assimilative capacity by recycled water projects are examples that may not necessarily describe the exact quality of the recycled water eventually produced in the basin. They also expressed concern that the projected impacts to water quality only considered direct recharge of all recycled water produced, without taking other applications such as expanded irrigation into consideration.</p> <p>The Regional Board recognizes that the scenarios considered in the SNMP are designed to cover a range of possible recycled water quality, allowing for the applicability of the analysis to similar situations. Also, regarding limiting the projection of water quality impacts to direct recharge only, the SNMP specifically states that direct recharge is likely to have the greatest impact on water quality and therefore, where some portion of the total</p>

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			<p>recycled water volume is applied in some other manner (such as increased use for irrigation), the impact on the assimilative capacity use will be less.</p> <p>The scenarios used in the SNMP were designed to include the universe of possibilities based on the information available during plan development. They are not viewed as limits to the expansion of recycled water irrigation projects or the existing use of recycled water in the event of increasing salt concentrations. Where future conditions deviate from all possibilities considered in the current plan, further evaluations may be conducted to revise water quality projections.</p> <p>That said, stakeholders have revised the SNMP to include further clarifying language in response to the commenter’s concerns.</p>
1.3	LACSD	<p>Proposed Basin Plan Amendment <i>No Project Scenario</i> (page 19) Attachment A The following edit clarifies that the No Project</p>	<p>The requested revisions have been made to the proposed Basin Plan amendment language.</p>

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		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 <u>additional</u> recycled water projects are implemented ... "	
1.4	LACSD	Draft Substitute Environmental Document (SED) <i>Section V.1.2. Alternative 2: Planned Recycled Water Projects</i> 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 <u>recharge</u> project <u>and the largest overall recycled water project</u> currently planned for the Main Basin; therefore, it was evaluated specifically in the anti-degradation analysis in the SNMP ...	The requested revisions have been made to the draft Substitute Environmental Document.
1.5	LACSD	<u>Proposed Basin Plan Amendment</u> <i>Projected Impacts of Future Project on Water Quality (page 17)</i> – The reference to Table 8.6-4 should instead be Table 8.6-5. ...The detailed results of the analysis are	The suggested revisions have been made to the proposed Basin Plan language.

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		<p>presented in Table 8.6-45.</p> <p><i>Salt and Nutrient Load Limits (page 19)</i> - The reference to Table 8.6-5 should instead be Table 8.6-4.</p> <p>Salt and nutrient loads to the Main San Gabriel Basin will be managed with the existing and planned programs/projects discussed above, in conjunction with other potential water quality management measures described in Table 8.6-54...</p>	
1.6	LACSD	<p><u>Draft Substitute Environmental Document (SED)</u></p> <p><i>Section IV.1.2.1. Groundwater Replenishment</i> – This section describes the potential implementation measures for the SNMP. The IRRP project, which is listed in Table 8.6-4B: Potential Future Management Measures of the Basin Plan Amendment, is inadvertently missing from this list and should be included.</p>	<p>The IRRP project is not missing from the SED. Rather; it is discussed separately as a major potential implementation measure.</p>