

Comment Summary and Responses
Comment Deadline: 12:00 pm, November 12, 2015
Incorporation of Stakeholder-Developed Groundwater Quality Management Measures for Salts and Nutrients in the Lower Santa Clara River Groundwater Basins

List of Commenters:

Comment Reference	Commenter/Organization	Representative
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; Ventura County Agricultural Irrigated Lands Group (Collectively Stakeholders)	Ventura County Watershed Protection Division (VCWPD)
2	Newhall County Water District (NCWD)	NCWD
3	Water Quality Association (WQA)	WQA

Response to Comments:

No.	Author	Comment	Response
1.0	Ventura County Watershed Protection Division (VCWPD)	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 approval of the Los Angeles Regional Water Quality Control Board's (Regional Water Board) amendments to the Water Quality Control Plan for the Los Angeles Region (Basin Plan) that would incorporate the Lower Santa Clara River Salt and Nutrient Management Plan (LSCR SNMP).	Comment noted.

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1.1	VCWPD	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 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.	Comment noted.
1.2	VCWPD	We have reviewed and support approval of the Amendment to the Water Quality Control Plan for the Los Angeles Region to Incorporate Stakeholder-Developed Groundwater Quality Management Measures for Salts and Nutrients in the Lower Santa Clara River Basin (Basin Plan Amendment). We feel the Basin Plan Amendment provides a good representation of the contents of the SNMP. Stakeholder comments on the Basin Plan Amendment were addressed by the Regional Water Board during the adoption process. Additionally, Stakeholders appreciate the feedback, support, and participation of Regional Water Board staff during the development of the SNMP.	Comment noted.
2.0	Newhall County Water District (NCWD)	The Newhall County Water District (NCWD) appreciates the opportunity to provide comments to the State Water Resources Control Board (State Water Board) regarding the incorporation of management measures for salts and nutrients in the Lower Santa Clara River Basin. NCWD has been actively engaged in water conservation efforts and is a strong supporter of the State Water Board's Policy for Water Quality Control for Recycled Water (Recycled Water Policy).	Comment noted.

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2.1	NCWD	NCWD and other local agencies are currently evaluating strategies to advance the use of recycled water from municipal wastewater sources in the Santa Clarita Valley (Valley). Promoting sustainable water supplies in the Santa Clara River Basin is a priority for NCWD.	Comment noted.
2.2	NCWD	The development of an innovative approach to achieve the stated goals of the Recycled Water Policy may necessitate further review of the Basin Plan. For certain, the implementation of these strategies will require collaboration between various public and private agencies and the State and Regional Boards.	The scope of this amendment is limited to the incorporation of groundwater quality management measures for salt and nutrients in the Lower Santa Clara Groundwater Basins. Further review of the Basin Plan is outside the scope of the amendment being considered. The comment regarding collaboration between various agencies is duly noted.
2.3	NCWD	NCWD looks forward to continuing to work with the State and Regional Boards to ensure we not only meet short term goals, but also address the development of a framework to discuss the advancement of long term water reliability policy.	Comment noted.
3.1	Water Quality Association (WQA)	I appreciate the opportunity to provide my thoughts on Santa Clarita's action to enforce a softener ban as part of the Basin Planning-Region Basin Plan Amendments. The Water Quality Association (WQA) and Pacific Water Quality Association (PWQA) are committed to addressing issues affecting water quality and both Associations pride themselves on supporting solid science. We believe a solution to chloride reductions in waste water can be found in technology, based on industry standards, and research.	Comments regarding Santa Clarita's action to enforce a softener ban are outside the scope of the Basin Plan amendment under consideration. The Regional Board does not direct the manner in which stakeholders will implement salt and nutrient management.
3.2	WQA	Through a review of Santa Clarita's report, there is no option for homeowners to upgrade to more salt efficient and water efficient systems. I advise an adjustment of Santa Clarita's plan to reflect having the chloride reduction from optimization or replacement, based on the findings from the "For the Reduction of Influent Chloride to Wastewater Treatment Plants by the Optimization of Residential Water Softeners" study.	This comment was not raised before the Los Angeles Regional Board during its public hearing on the matter on July 9, 2015, and is therefore not timely. That notwithstanding, adoption of the management measures currently in the amendment does not preclude stakeholders from

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		This gives an option backed by research.	considering additional institutional controls for salt and/or nutrient management. The commenter is encouraged to engage with the stakeholders of the Lower Santa Clara River groundwater basins to present them with potential alternatives to water softeners, for their consideration. Such considerations should not warrant a revision of the stakeholder-developed plan.
	WQA	The Water Quality Research Foundation (WQRF) has partnered with the Madison Metropolitan Sewage District (MMSD) to fund an independent research study on the reduction of chloride in wastewater treatment plants through optimizing existing water softeners and replacing water softeners with 'high efficient water softening systems'. The preliminary results from the "For the Reduction of Influent Chloride to Wastewater Treatment Plants by the Optimization of Residential Water Softeners" study have found optimization achieved a 16 percent reduction in chloride mass and softeners that were replaced with 'high efficient water softening systems' achieved an over 53 percent reduction in chloride mass.	Comment noted
	WQA	<p>Other WQRF funded research investigated energy savings in the 2009 Energy Savings Study, also called the Battelle Study. It found softeners help preserve the efficiency of water heaters and major appliances and keep showers and faucets unclogged. From the data, Battelle was able to develop a "differential carbon footprint assessment" for residences using unsoftened water versus softened water.</p> <p>We encourage anyone interested in learning more about the "For the Reduction of Influent Chloride to Wastewater Treatment Plants by the Optimization of Residential Water Softeners" study to contact WQA.</p> <p>We would be happy to provide a presentation at a future meeting and answer any questions.</p>	Comment noted.