

Comment Summary and Responses
Comment Deadline: 12:00 pm, July 2, 2015
Incorporation of Stakeholder-Proposed Groundwater Quality Management Measures for Salts and Nutrients in the Central and West Coast Groundwater Basins

List of Commenters:

Comment Reference	Commenter/Organization	Representative
1	Water Replenishment District of Southern California (WRD)	WRD
2	County Sanitation Districts of Los Angeles County (LACSD)	LACSD
3	Joyce Dillard (Private Citizen)	Self

Response to Comments:

No.	Author	Comment	Response
1.0	Water Replenishment District of Southern California (WRD)	The Water Replenishment District of Southern California (WRD) greatly appreciates the opportunity to again express our strong support of the State Water Resources Control Board's (State Water Board) proposed resolution to approve a Basin Plan Amendment associated with the Central and West Coast Groundwater Basins of Los Angeles County. By incorporating the stakeholder proposed groundwater quality management measures for salts and nutrients in these basins, WRD will be better able to maintain the high quality water the 4 million residents within these basins have come to expect.	Comment noted.
1.1	WRD	As the largest groundwater agency in the State of California, WRD replenishes, manages, and protects two of the most utilized urban groundwater basins in the nation, the Central Basin and West Coast Basin. Our 420-square mile service area covers the southern half of Los Angeles County and encompasses 43 cities, including a portion of the City of Los Angeles, and uses about 250,000 acre-	Comment noted.

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		<p>feet (82 billion gallons) of groundwater annually. Groundwater in the Central Basin and West Coast Basin supply 40% of the total water demand in the region; the remaining 60% of the demand is water imported from Northern California and the Colorado River. Recycled water, as well as stormwater, have been used by WRD for groundwater replenishment in the Central Basin and West Coast Basin for over 50 years to ensure the reliability and sustainability of the overall water supply.</p>	
1.2	WRD	<p>WRD and the other stakeholders in the basins have long been aware of the challenges posed by climate change and the environmental costs associated with the continued use of imported water for groundwater replenishment. As a result, WRD has worked diligently over the past 10 years to significantly reduce our dependence on imported water by implementing our Water Independence Now (WIN) effort, a suite of programs and projects that aim to maximize our use of stormwater and recycled water to create a completely locally sustainable groundwater supply.</p> <p>The careful development of the Salt and Nutrient Management Plan by the basin stakeholders in close consultation with the Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) was a key milestone in these efforts, one that will further our common goal of preserving and protecting our precious groundwater resources.</p>	Comment noted.
1.4	WRD	<p>The Los Angeles Water Board's input and guidance throughout the planning and preparation of the Salt and Nutrient Management Plan was invaluable to our efforts in bringing this comprehensive plan to fruition. WRD looks forward to working with the Los Angeles Water Board as we continue to implement groundwater recharge projects that are designed to</p>	Comment noted.

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		achieve the goals of the Recycled Water Policy, sustainable groundwater basins, and Water Quality Objectives for the benefit of all of the water supply needs of our environment and communities.	
2.0	County Sanitation Districts of Los Angeles County (LACSD)	The Joint Outfall System 1 (Sanitation Districts) appreciates the opportunity to comment on the proposed approval of the Los Angeles Regional Water Quality Control Board's (Regional Board) amendments to the Water Quality Control Plan for the Los Angeles Region (Basin Plan) that would incorporate stakeholder-proposed groundwater quality management measures for salts and nutrients in the Central and West Coast groundwater basins of Los Angeles County. The Sanitation Districts strongly support approval of these amendments to the Basin Plan. These amendments will allow for additional recycled water to be used in these basins, helping to ensure a reliable supply of water for the region. This is particularly important given the current drought situation in California, as substantiated by Governor Brown's statewide drought emergency declaration on January 17, 2014.	Comment noted.
2.1	LACSD	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 our remaining Salinity Nutrient Management Plans.	Comment noted.
3.0	Joyce Dillard	For the Public, these plans are procedures are complex and not brought forward in local meetings considered under any due process. The Regional and State jurisdictions take local land use issues into water policy issues with notifications to those few who understand that water does not come by the way of a utility bill such as the LADWP.	The Salt and Nutrient Management Plan was developed through a collaborative public process that was open to all stakeholders and interested persons. Likewise, the CEQA process and the Los Angeles Regional Board's consideration of the proposed Basin Plan amendment met all public noticing requirements.

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3.1	Joyce Dillard	<p>Water Code 13050(n), as stated in this Resolution, refers to "reasonable protection of beneficial uses". The Recycled Water Policy states:</p> <p>The SNMPs are to be developed by local water and wastewater entities, together with local salt/nutrient contributing stakeholders through a collaborative process open to all interested persons. The SNMPs are to be completed and proposed to the Regional Water Boards no more than seven years of the effective date of the Policy (or by May 14, 2016). The Policy also directs the Regional Water Board to consider incorporating the implementation programs contained in these SNMPs into its water quality control plan within one year of their submission to the Regional Water Board.</p> <p>Many sub-basins have no adjudication and have no local water and wastewater entities jurisdiction, but private property owner jurisdiction. Those effects of stormwater and urban runoff are not addressed on these basins.</p> <p>Storage capacity is:</p> <p>West Coast Basin 6,500,000 AF Natural Central Basin 13,800,000 AF Natural & Recycled</p>	<p>In this case, the Salt and Nutrient Management Plans were developed by "local water and wastewater entities, together with local salt/nutrient contributing stakeholders...". The Regional Board then incorporated the implementation programs into its water quality control plan. The plans are developed regardless of whether or not the basins are adjudicated.</p>
3.2	Joyce Dillard	<p>We do not understand the impact on the earthquake faults in the two basins nor on the oil and methane issues. Migrating gases are an issue in the City of Los Angeles, if not other surrounding areas.</p>	<p>The issue raised is beyond the scope of the proposed Basin Plan amendment.</p>
3.3	Joyce Dillard	<p>This Resolution is based on planning before the issuance of LA Regional Water Quality Control Board ORDER NO. R4-2012-0175 LAMS4 Municipal Separate Storm Sewer NPDES Permit NO. CAS004001 and the State Board Order WQ 2015-0075.</p> <p>Enhanced Watershed Management Plans are under</p>	<p>Salt and Nutrient Management Plans are a requirement of the State Water Board's Recycled Water Policy which is intended to promote increased use of recycled water while protecting the beneficial uses of groundwater. The use of stormwater for groundwater recharge is generally a consideration in such</p>

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		the Regional Board jurisdiction, with after-the fact State Board oversight. This is not sufficient. The State Board is approving policy without evening attempting, in any resolution or order, to determine costs.	plans for its potential to improve groundwater quality. However, these plans are not related to the Municipal Separate Storm Sewer NPDES Permit requirements and therefore, the issue raised is beyond the scope of the proposed Basin Plan amendment.
3.4	Joyce Dillard	We are attaching US Supreme Court decision MICHIGAN v. US EPA for the Court's opinion on the importance of costs, or estimation thereof, before issuance of regulations.	The issues addressed in that opinion are not relevant to the incorporation of stakeholder-developed groundwater basin management measures into the Basin Plan.