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## State Water Resources Control Board

August 21, 2023

Ms. Tessa Lenz  
United Water Conservation District  
1701 North Lombard Street, Suite 200  
Oxnard, CA 93030  
Email: [tessal@unitedwater.org](mailto:tessal@unitedwater.org)

**Operational Changes at Santa Felicia Dam Project  
Federal Energy Regulatory Commission Project No. 2153  
Ventura County  
Lower Piru Creek**

**APPROVAL OF DISSOLVED OXYGEN MONITORING PLAN REPORTS FOR  
OPERATIONAL CHANGES AT SANTA FELICIA DAM PROJECT**

Dear Ms. Lenz:

On March 6, 2014, the State Water Resources Control Board (State Water Board) Executive Director issued a water quality certification (certification) pursuant to section 401 of the Clean Water Act for United Water Conservation District's (United's) Operational Changes at the Santa Felicia Dam Project (Project). Condition 2 of the certification requires United to develop and implement a Dissolved Oxygen Monitoring Plan (DOMP) to: (1) monitor dissolved oxygen (DO) concentrations in lower Piru Creek; and (2) determine if Project operations comply with DO water quality objectives in the *Water Quality Control Plan for the Los Angeles Region – Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan). Additionally, Condition 2 of the Project certification: (1) requires United to submit annual reports documenting DO monitoring results; and (2) allows the Deputy Director for the Division of Water Rights (Deputy Director) to direct United to develop a Dissolved Oxygen Improvement Plan if information in the report indicates DO measurements violate Basin Plan objectives for lower Piru Creek.

**Background.** Consistent with the DOMP, in 2016, United began DO monitoring in lower Piru Creek. Since United began DO monitoring, it has determined that the Santa Felicia Project adversely affects DO concentrations in lower Piru Creek during periods when Lake Piru Reservoir is stratified and United is making flow releases to lower Piru Creek predominately from the Hydropower Unit 1 release valve. During these periods, DO levels in lower Piru Creek fall below the Basin Plan requirements of 5 milligrams per liter.

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E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 | [www.waterboards.ca.gov](http://www.waterboards.ca.gov)



Beginning in 2018, United made several improvements in an attempt to address the Project's DO impacts. These improvements included: (1) installation of an aerator in the tailrace (2018); (2) adding 30 inches of stop logs in the outfall and a grated catwalk in the tailrace to aerate flow releases (2020), and (3) installation of pumps connected to fire hose style nozzles in the tailrace (2022).

**Most Recent DO Monitoring Reports Summary and Related Actions.** On March 31, 2023, United submitted its seventh annual Dissolved Oxygen Monitoring Report (reporting DO concentrations measured in 2022), which notes that Lake Piru Reservoir turned-over (mixed) and was not stratified during August and September 2022. All 2022 water releases were made through the low flow valves, which resulted in no water releases through the Hydropower Unit 1 release valve. Therefore, no focused DO monitoring was performed in lower Piru Creek in 2022.

**Approval.** United shall continue to implement focused DO monitoring per Section 5 of the 2018 DOMP when Lake Piru is stratified and water releases are being made through the Hydropower Unit 1 release valve. United shall also continue to operate and maintain the physical modifications to the tailrace and aerators, as needed to address DO impairments. If monitoring results indicate Project operations continue to impair DO concentrations, the Deputy Director may require United to develop and implement a Dissolved Oxygen Improvement Plan, among other actions.

State Water Board staff appreciate that United continues to work on interim solutions to address DO impairments and looks forward to continued work on long-term actions to address DO concentrations, including the Santa Felicia Dam Safety Improvement Project. The Santa Felicia Dam Safety Improvement Project involves the construction of new intakes and an outlet at Santa Felicia Dam, which will replace the existing Project discharge points to lower Piru Creek. Construction and operation of a new outlet should be designed to provide for long-term compliance with the Basin Plan DO water quality objective.

If you have questions regarding this letter, please contact James Noss, Project Manager, by email to: [James.Noss@waterboards.ca.gov](mailto:James.Noss@waterboards.ca.gov)

Written correspondence should be directed to:

State Water Resources Control Board  
Division of Water Rights – Water Quality Certification Program  
Attn: James Noss  
P.O. Box 2000  
Sacramento, CA 95812-2000

Sincerely,



Erik Ekdahl, Deputy Director  
Division of Water Rights

ec: Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
**Via e-filing to FERC Docket P-2153**

Ms. Amy J. Bricker, Shute, Mihaly & Weinberger LLP  
Email: [info@smwlaw.com](mailto:info@smwlaw.com)

Susana Arredondo, Executive Officer  
Los Angeles Regional Water Quality Control Board  
Email: [Susana.Arredondo@waterboards.ca.gov](mailto:Susana.Arredondo@waterboards.ca.gov)

Mr. Tomas Torres, Director of Water Division  
United States Environmental Protection Agency, Region 9  
Email: [R9cwa401@epa.gov](mailto:R9cwa401@epa.gov)

Mr. Daniel Blankenship, California Department of Fish and Wildlife  
Email: [Daniel.Blankenship@wildlife.ca.gov](mailto:Daniel.Blankenship@wildlife.ca.gov)

Ms. Valerie Carrillo Zara  
Los Angeles Regional Water Quality Control Board  
Email: [Valerie.Zara@Waterboards.ca.gov](mailto:Valerie.Zara@Waterboards.ca.gov)

Ms. Linda Purpus  
United Water Conservation District  
Email: [Lindap@unitedwater.org](mailto:Lindap@unitedwater.org)

Evan Lashly, Environmental Scientist  
United Water Conservation District  
Email: [EvanL@unitedwater.org](mailto:EvanL@unitedwater.org)