



October 22, 2021
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VIA ELECTRONIC MAIL

Ms. Eva Ibarra
Piru Basin Groundwater Sustainability Agency
United Water Conservation District
1701 N. Lombard St, Suite 200
Oxnard, California 93030

Dear Ms. Ibarra:

Comments on the Piru Basin Groundwater Sustainability Plan Public Review Draft

The Santa Clarita Valley Sanitation District (Sanitation District) appreciate the Piru Basin Groundwater Sustainability Agency's (GSA) efforts in developing the Piru Basin Draft Groundwater Sustainability Plan (GSP) and appreciate the opportunity to comment. In reviewing the GSP, the Sanitation Districts are concerned that the chloride, sulfate, and total dissolved solids (TDS) results from wells in the Lower Area East of Piru Creek were compared to incorrect water quality objectives. Per Table 3-13 in Chapter 3 of the *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan), the water quality objectives for the Lower Area East of Piru Creek are 200 mg/L for chloride, 1,200 mg/L for sulfate, and 2,500 for TDS, which are not reflected in the draft GSP. We recommend that the water quality objectives used in the GSP match those in the Basin Plan. In addition, the Sanitation District would also like to suggest several changes that reflect progress that has been made to comply with the Upper Santa Clara River (USCR) Chloride Total Maximum Daily Load (TMDL), which is designed in part to protect groundwater in the east Piru Basin.

The Sanitation District's comments are detailed below, with deletions indicated, with strike-out text, and additions in bold text.

- 1) *Section 2.2.2.5.2, TDS, page 2-44, lines 13 and 19-20: Recommend correcting the TDS water quality Objective (WQO) and stating that the TDS result was below the WQO (if the result was below 2,500 mg/L). We also recommend including the TDS result when it's compared to the WQO.*

Line 13: "• Lower area east of Piru Creek (WQO = ~~1,200 mg/L~~ **2,500 mg/L**)"

Lines 19-20: "One well [**Enter result**] shows TDS by TFR ~~above~~ **below** the WQO in Lower area East of Piru Creek."

- 2) *Section 2.2.2.5.2, Sulfate, page 2-45, lines 19 and 24-25: Recommend correcting the sulfate water quality Objective (WQO) and stating that the sulfate result was below the WQO."*

Line 19: "• Lower area east of Piru Creek (WQO = ~~600 mg/L~~ **1,200 mg/L**)"

Lines 24-25: "One well (646 mg/L) shows sulfate ~~above~~ **below** the WQO in Lower area East of Piru Creek."

- 3) *Section 2.2.2.5.2, Chloride, page 2-46, lines 19 and 24-25: Recommend correcting the chloride water quality Objective (WQO) and stating that the chloride results were below the WQO.”*

Line 19: “• Lower area east of Piru Creek (WQO = ~~100 mg/L~~ **200 mg/L**)”

Lines 24-25: “All three wells (117 - 158 mg/L) sampled in 2015 show **chloride below sulfate above** the WQO ~~limit and~~ **but** at or above the toxicity threshold for avocados in Lower area East of Piru Creek.”

- 4) *Section 2.2.2.5.2, Chloride, page 2-47, lines 22-24: Recommend correcting the year the USCR Chloride TMDL was adopted. The USCR Chloride TMDL was fully adopted in 2004. In addition, the Sanitation District has made progress on implementing TMDL actions to mitigate chloride impacts and we recommend that this progress be noted.*

Lines 22-24: “A chloride total maximum daily load (TMDL) for the Upper Santa Clara River was adopted in ~~2008~~ **2004**, ~~but the proposed TMDL actions to reduce and mitigate chloride impacts in the Piru Basin have not yet been fully implemented. and actions to comply with the TMDL implementation plan to reduce and mitigate chloride impacts in the Upper Santa Clara River and east Piru Basin are underway. The Sanitation District has begun operating the UV disinfection facilities at the Saugus and Valencia WRPs and anticipates that the Advanced Water Treatment Facility will be operational by December 2022, which will bring the Valencia and Saugus WRPs into full compliance with the requirements of the Upper Santa Clara River Chloride TMDL.”~~

We appreciate your consideration of our comments. If you have any questions or require additional information, please contact the undersigned at (562) 908-4288 ext. 2801 or via email at erikabensch@lacsdsd.org.

Very truly yours,

Erika Bench
Division Engineer
Reuse and Compliance Section

EXB:NW:bb