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COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY 1955 Workman Mill Road, Whittier, CA 90601-1400 Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998 Telephone: (562) 699-7411, FAX: (562) 699-5422 www.lacsd.org GRACE ROBINSON CHAN Chief Engineer and General Manager September 26, 2012 File No. 14-14.01-00 20-04.01-00 ***Via Electronic Mail*** Mr. Richard Booth California Regional Water Quality Control Board Lahontan Region 2501 Lake Tahoe Boulevard South Lake Tahoe, CA 96150 Dear Mr. Booth: **2012 Triennial Review of the Lahontan Basin Plan** Thank you for the opportunity to provide comments on the 2012 Triennial Review of the Water Quality Control Plan for the Lahontan Region (Basin Plan). Within the jurisdiction of the California Regional Water Quality Control Board, Lahontan Region (Regional Board), County Sanitation District Nos. 14 and 20 of Los Angeles County (Sanitation Districts) operate the Lancaster and Palmdale Water Reclamation Plants (WRPs), respectively. These plants operate under Regional Board Orders and may be directly impacted by modifications to the Basin Plan. The Sanitation Districts request that the Regional Board consider as a high priority for the 2012 Triennial Review the examination of Beneficial Use (BU) designations for Amargosa Creek downstream of the point of Lancaster WRP discharge, Piute Ponds (also known as "Paiute Ponds"), and the Piute Ponds Wetlands, all of which are located in the Lancaster Hydrologic Area. The Regional Board has put forth substantial efforts toward establishing specific BUs for Piute Ponds in the past and has repeatedly indicated its intent[1,2] to consider changes in the designation of other BUs, namely Ground Water Recharge (GWR) and Agricultural Supply (AGR). This specific issue was considered in the 2009 Triennial Review, and was identified by the Regional Board as a priority, but one that would require additional resources in order to be addressed.[3] The Sanitation Districts would like to support efforts to de-designate these BUs, and suggest that the issue be considered as a high priority because these beneficial uses do not actually exist for these receiving waters. The Sanitation Districts are greatly concerned that there remains the risk that inappropriate water quality standards could be applied to these waterbodies, and the discharges to them, despite the fact that the BU designations are not appropriate. Application of drinking water or salt-sensitive agriculture based limits to end of pipe discharges would likely require advanced treatment. Application of those same limits to receiving water would result in the [1] Letter to Sanitation Districts from Regional Board, "*Comments On Los Angeles County Sanitation Districts' October 2003 Aquatic Biological Survey and Beneficial Use Designation Reports for Paiute Ponds, Amargosa Creek, and Rosamond Dry Lake*," January 20, 2004. [2] Lahontan Regional Board, "*Technical Staff Report: Revised Water Quality Standards for Surface Waters of the Antelope Hydrologic Unit*," August 2007. [3] Lahontan Regional Board Resolution R6T-2009-013, adopted October 15, 2009. DOC #2342870	**LACSD-1**: The 2012 Triennial Review Staff Report recommends Project #25, Beneficial Uses at Paiute Ponds, as low priority for basin planning resources. The record may or may not support removal of two designated present or potential beneficial uses for Paiute Ponds, and working on the beneficial use removal is not needed at this time. The Sanitation Districts' discharge complies with current permit requirements.

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need for advanced treatment and greatly increased flows in the waterbodies to counteract the effects of evapoconcentration.

Ground Water Recharge (GWR)

The Sanitation Districts have provided the Regional Board with substantial technical evidence indicating that the GWR Beneficial Use does not exist for Amargosa Creek downstream of the point of Lancaster WRP discharge, Piute Ponds, and the Piute Ponds Wetlands. Since submitting the reports, "*Beneficial Use Designation Report*" (October 2003) and "*Addendum to Final Report, Beneficial Use Designation Report*" (August 2004), the Sanitation Districts have investigated extensively the areas of Amargosa Creek, Piute Ponds and Rosamond Dry Lake as part of the Lancaster WRP Groundwater Monitoring Plan. In accordance with waste discharge requirements[4], this Groundwater Monitoring Plan was implemented to investigate the potential effects of discharges to the Lancaster WRP receiving waters on underlying groundwater quality. A summary of the findings of this study was submitted to the Regional Board in the final report, "*Lancaster Water Reclamation Plant Groundwater Monitoring Plan: Evaluation of Phase II Investigation Results at Piute Ponds*" in December 2005. The analysis indicated that there is no significant recharge to the groundwater aquifer below Piute Ponds and Rosamond Dry Lake, due to the presence of a thick lacustrine clay layer. Shallow water exists below the Piute Ponds area, but it is isolated from the groundwater aquifer by this clay layer, which dips to the west or southwest of Piute Ponds. Since shallow groundwater below Piute Ponds has the potential to flow down the slope of the lacustrine clay layer and contribute to the observed perched intervals, which in turn creates the possibility of contributing to recharge of the regional groundwater aquifer, the Sanitation Districts retained Geochemical Technologies Corporation (GTC) to further investigate this hypothesis. GTC evaluated hydrogeological and groundwater quality data, and based on this evaluation, concluded that there is insignificant or no recharge to the regional groundwater aquifer under the Lancaster WRP receiving waters, because there appears to be no mechanism that provides a pathway for recharge. The findings of this study are contained in the previously submitted memorandum, "*Subsurface Geohydrology Project: Paiute Ponds*" (December 2006), prepared by GTC.

Agricultural Supply (AGR)

The waters of Amargosa Creek downstream of the point of Lancaster WRP discharge, Piute Ponds, and the Piute Ponds Wetlands have not been used since at least 1968, the date the Regional Board uses for purposes of determining an "existing use", nor are they proposed to be used as agricultural supply. The waterbodies downstream of the point of Lancaster WRP discharge exist wholly within property owned by the US Air Force and the limited-access area is maintained for the purposes of habitat maintenance. There may have been a previous understanding by the Regional Board staff that the water in Piute Ponds would be diverted to agricultural sites for crop irrigation. This is not the case and there are no plans to do so. Water that flows through the ponds is discharged to Rosamond Dry Lake. The Sanitation Districts and Edwards Air Force Base are currently evaluating options to maintain the integrity of Piute Ponds, but none of these involve the use of Piute Ponds water for agricultural supply.

Recycled water used for agricultural supply is piped directly from the Sanitation Districts-operated water reclamation facilities, and is never conveyed from Amargosa Creek downstream of the point of Lancaster WRP discharge, Piute Ponds, or the Piute Ponds Wetlands. Ambient water from Piute Ponds is not suitable as irrigation water for agricultural uses, primarily due to high salt levels. Any water diverted from Piute Ponds and used for irrigation would have to be treated (salt removal) or blended with another source of water to make it suitable for crop irrigation.

The Regional Board has indicated that, "If future management scenarios for the Piute Ponds do not include agricultural diversions, the Water Board may consider removing the AGR use from the ponds and wetlands at a later date."[5] Again, there are no plans for diversions of water from Piute Ponds for

[4] Lahontan Regional Board Order No. R6V-2002-05, adopted September 11, 2002.
[5] Lahontan Regional Board, "*Technical Staff Report: Revised Water Quality Standards for Surface Waters of the Antelope Hydrologic Unit,*" August 2007.

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  agricultural supply; thus, the Sanitation Districts request that AGR be de-designated as a beneficial use for Amargosa Creek downstream of the point of Lancaster WRP discharge, Piute Ponds, and the Piute Ponds Wetlands. In addition, as explained earlier in regards to groundwater recharge, there is very limited connectivity from Amargosa Creek downstream of the point of Lancaster WRP discharge, Piute Ponds, or the Piute Ponds Wetlands to the regional groundwater aquifer that is used for some agricultural activities. Thus, the AGR beneficial use for groundwater would not be affected by de-designating this use for surface water. Again, the Sanitation Districts thank you for the opportunity to comment on the 2012 Triennial Review of the Lahontan Basin Plan, and hope that you will come to the same conclusion as you did in 2009 regarding the Beneficial Uses in question. Additionally, the Sanitation Districts may be able to offer staff resources to assist with your Basin Planning efforts, as they pertain to Sanitation Districts' activities and concerns. If you have any questions, please contact Erika de Hollan at (562) 908-4288, extension 2836 or by email at (edehollan@lacsd.org). Very truly yours, Grace Robinson Chan Mike Sullivan Section Head Monitoring Section MS:EXD:lmb	