



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE
Chief Engineer and General Manager

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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:

2015 Triennial Review of the Lahontan Basin Plan

Thank you for the opportunity to provide comments on the 2015 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 2015 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 designating 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 and 2012 Triennial Reviews, 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 and could become an urgent issue for Sanitation Districts' activities. Regional Board staff has indicated that they are considering whether to begin working on revising the Sanitation District No. 14's current waste discharge permit, which includes allowing discharge from the Lancaster WRP to the Piute Ponds receiving water. Regardless of the timing of this review, a permit renewal will be required before terms in the permit expire in 2020. The Sanitation Districts are greatly concerned that inappropriate water quality standards could be applied to these receiving waters, and the discharges to them, despite the fact that the GWR and AGR BU designations are not appropriate. Application of

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 Regional Board Resolutions R6T-2009-013 and R6T-2013-0008.

drinking water or salt-sensitive agriculture based limits to end of pipe discharges and the receiving water would likely require the construction and implementation of advanced treatment facilities.

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 related reports, “*Beneficial Use Designation Report*” (October 2003) and “*Addendum to Final Report, Beneficial Use Designation Report*” (August 2004), the Sanitation Districts have investigated 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 impacts to the underlying groundwater resulting from Lancaster WRP discharges to the receiving surface water. A summary of the findings of this study was submitted to the Regional Board in the 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 included 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 as agricultural supply 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 this 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, but this is not the case and there are no plans to do so.

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 often 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 to divert water from Piute Ponds for 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.

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.

In addition, as described earlier, 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 the surface water.

Again, the Sanitation Districts thank you for the opportunity to comment on the 2015 Triennial Review of the Basin Plan. 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 Bensch at (562) 908-4288, extension 2836 or by email at erikabensch@lacsdsd.org.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ann Heil".

Ann Heil
Monitoring Section Head
Technical Services Department

ATH:AJH:EXB:lmb