

Response to Comments

City of Oxnard Groundwater Recovery, Enhancement, and Treatment Program-Nonpotable Reuse Phase I Project Tentative Amended NPDES Permit

This Table describes all significant comments received from interested persons with regard to the above-mentioned tentative permit.
Each comment has a corresponding response and action taken.

Commenter	#	Comment	Response	Action Taken
Comments received from the City of Oxnard, Calleguas Municipal Water District (CMWD) and Pleasant Valley County Water District (PVCWD) on June 12, 2015				
City of Oxnard, CMWD, and PVCWD	C-1	<p><u>Order R4-2008-0083</u></p> <ul style="list-style-type: none"> • The order should reference the SMP as the RSMP throughout for consistency with the Calleguas MWD Permit. • (Page T-3) 2B should not state California Health Services – the ELAP is under the SWRCB DDW. • (Page T-4) 1.A.a. “FCVWD” should be “PVCWD” 	Staff agreed	Revisions were made to the permit
	C-2	<p>(Page T-6) 3. A seems to describe a scenario where Oxnard monitors at a “new” station on the RSMP line. We suggest the following: “...Including samples collected at the connection from the RSMP to PVCWD which is physically closest to the Round Mountain Desalter.” (This sample scenario is referred to again on T-10 V.3.)</p>	<p>Staff revises the description of the new sampling point for clarity as follows; “ samples collected at a new monitoring location on the Wood Road temporary piping as shown on Figure 6 connecting the RSMP to the PVCMD, so that the sample will reflect the comingled water from the RSMP and the AWPFD..”</p> <p>The same change will be made on T-10.V.3.</p>	Revisions were made to the permit
	C-3	<p>(Page T-6) 3.B.c. refers to three connection points – this should be changed to: “c. The average daily flow rate at each connection point from the RSMP to the agricultural users and the monthly volume.”</p>	<p>Staff agreed to the following revision “The weekly flow and monthly volume, at each connection point from the RSMP to agricultural users shall be measured and reported separately and collectively and will be translated into average daily flow rates for each weekly period.”</p> <p>Staff also notes that the Order does not allow additional connections without prior approval.</p>	Revisions were made to the permit

Commenter	#	Comment	Response	Action Taken
	C-4	(Page T-10) Table M4. Change all sample types to “grab”, Change monitoring constituents to include only those related to TMDL salt loading, i.e. “TDS, Chloride, and Sulfate”	Staff agrees that Boron should only be listed once on Table M4, but finds that the requirements for grab sampling and specific constituents are correct and based on the existing AWPf monitoring requirements and the Basin Plan requirements to protect the Pleasant Valley groundwater basin. Based on a review of the monitoring requirements, the MBAS was removed from the effluent sampling and a note was added to V. Recycled Water Monitoring to note that if quarterly sampling for the first year after adoption does not identify concentrations above MCL or Basin Plan limits, some of the monitoring frequency in table M4 may be reduced to bi-annually. Composite sampling based on time increments is acceptable and is noted in Footnote 15 for Table M4.	Revisions were made to the permit
	C-5	(Page T-9) Footnote 9 says CDPH instead of DDW	Staff agreed to change CDPH to DDW.	Revisions were made to the permit
City of Oxnard, CMWD, and PVCWD	C-6	<u>Order R4-2011-0079</u> <ul style="list-style-type: none"> • The Order should reference the SMP as the RSMP throughout for consistency with the Calleguas MWD Permit. • (Page 5) E. Post-Treatment Systems Delete: “Lime is needed to increase the pH and achieve an Langelier Saturation Index (LSI) of +2. A portion of the carbon dioxide must be removed to reduce the lime dose needed for stabilization. If...” Replace with: “Carbon dioxide removal and lime dosing are needed for stabilization. If...” • (Page 6) A.b. Delete this paragraph in its entirety. 	Staff agreed to change SMP to RSMP. Staff agreed to update the process description and updated paragraph A.b rather than delete it.	Revisions were made to the permit
	C-7	(Page 7) Change Paragraphs 1 and 2 to read: “For Phase 1 of the GREAT Program, the following recycled water delivery system goals are:	Staff agreed to the proposed changes.	Revisions were made to the permit

Commenter	#	Comment	Response	Action Taken
		<p>a. Establish recycled water delivery system to 6.25 mgd capacity.</p> <p>b. Construct Hueneme Recycled Water pipeline Approximately 26,000 Feet of 42 and 36 –inch pipeline.</p> <p>c. Construct Ventura Road Recycled Water Backbone Pipeline.</p> <p>d. Construct Tie-in to PVWCD irrigation system for delivery of recycled water.</p> <p>To utilize the PVCWD irrigation network prior to construction of the Hueneme Recycled Water pipeline, a temporary connection will be made from the AWPf recycled water discharge to the RSMP and from the RSMP to the PVWCD irrigation network. This temporary piping will be removed once the permanent piping has been constructed or temporary use of the RSMP for this purpose is no longer feasible.</p> <p>Future Phases of the GREAT Program would expand the recycled water delivery system to:</p> <p>a. Establish recycled water delivery system to 25 mgd capacity.</p> <p>b. Construct Hueneme Recycled Water pipeline extension.</p> <p>c. Construct piping and Tie-ins to Ventura Road Recycled Water Backbone pipeline for City recycled water uses such as landscape irrigation and approved industrial uses.</p> <p>d. Construct Tie-ins to pumping trough pipeline irrigation system and other agricultural users for delivery of recycled water.”</p>		
	C-8	(Page 11) Table 2, Revise to show two tables as defined in ORDER R4-2008-0083, one for AWPf Effluent Monitoring (Table M3) and one for AWPf treated effluent Monitoring via the SMP (Table M4), see City comments on Order R4-2008-0083 with	Staff agrees. The constituents in the MRP tables M3 and M4 are now described in a table in the Order.	Revisions were made to the permit

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		reference to sampling constituents and sample type.		
	C-9	<p>(Page 12 &13) Add the following to: “1. The AWPf Treated recycled water may be used for the following:..... E. Dust control on roads, streets and fields F. Backfill consolidation around piping G. Soil compaction H. Cleaning Roads, sidewalks, and outdoor work areas Flushing Sanitary Sewers J. Other Title 22 Uses”</p>	<p>R4-2011-0079-A01 includes language which allows recycled water uses to include: (III.1.f.) “Other allowable applications specified in the Water Recycling Criteria, Chp. 3, Title 22, CCR, provided approval from DDW and Regional Water Board Executive Officer are obtained prior to delivery.” Language is added to allow delivery of uses already defined in Title 22 after approval by the DDW. Order R4-2011-0079-A01 cannot permit new uses which have not received DDW review.</p>	<p>Revisions were made to the permit</p>
	C-10	<p>(Page 13) 6. Delete this paragraph and rewrite for clarity as follows: “6. During the use of the RSMP to deliver water to PVCWD, the AWPf treated recycled water will mix with variable amounts of brine including the flow discharged from Camrosa’s Round Mountain Desalter facility. The discharger of brine from the Camrosa desalter is covered under NPDES permit CA0064521, Order R4-2014-0033 issued by this Regional Board on March 6, 2014 and amended at the July 8, 2015 Regional Board hearing. To satisfy the Recycled Water Limitations in Table XX at the temporary connection to the PVCWD sampling station which is physically closest to the Round Mountain Desalter, the recommended daily average minimum flow from the AWPf to the RSMP is 3.0 MGD. If the monitoring results of the recycled water being distributed from the RSMP to the agricultural users do not confirm attainment of the limits of this Order, than the daily average minimum flow from the AWPf should be increased and a new minimum flow recommended.”</p>	<p>Staff revised the paragraph for more clarity. The study conducted by Larry Walker and Associates to verify the recycled water quality after mixing was based on a reasonable steady flow of both the AWPf and the Camrosa brine. In the event that the recycled water quality cannot be maintained by setting a minimum flow at the AWPf flow rate into the RSMP, then a minimum flow rate from the RSMP to the Oxnard Plain growers is required to better estimate the conditions of steady flow.</p>	<p>Revisions were made to the permit</p>

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	C-11	(Page 13) Add the following: "8. If a tanker truck is used to pick-up water from the producer and distribute the water, than the producer must have a record tracking system for the recycled water (e.g. release form) and the end-user shall be responsible for application of the recycled water and have a written agreement with the distributor to inform of the requirements of this permit."	Staff agreed to add language to the permit to allow tanker truck and residential fill operations if reviewed and approved by DDW..	Revisions were made to the permit
	C-12	<ul style="list-style-type: none"> • (Page 24) Figure 2, see revised figure attached • (Page 25) Figure 3, see revised figure attached • (Page 30) Figure 8, see revised figure attached • Delete Figures 5 and 6. 	Staff agreed to replace Figures 2 and 3 with provided figures. Since Figures 5 and 6 are no longer current and the distribution system is better represented by Figure 9 of the Tentative Order, Figures 5 and 6 have been removed and the figures renumbered.	Revisions were made to the permit
Comments received from Pleasant Valley County Water District on June 15, 2015				
PVCWD	P-1	<p>Pleasant Valley County Water District supports this permit following these changes:</p> <ul style="list-style-type: none"> • (Page 1, "Purpose of Amendment to Order No. R4-2011-0079" Paragraph 1, 3rd sentence) "The PVCWD requests that the water be transported into PVCWD's irrigation distribution <u>system and to the Oxnard Plain</u> via the Calleguas Regional Salinity management Pipeline (SMP) until the planned permanent connection can be constructed or additional flows into the SMP render the option not feasible, whichever comes first." • (Page 6, "Pump Station, and Transmission of Recycling Water," Section 14, 4th sentence) "Figures 8, 9, and 10 show the operation of the SMP to supply AWPf recycled water <u>to growers within the Oxnard Plain</u> to Pleasant Valley farmers and the temporary connections required by this amendment." • (Page 13, "Specifications for Use of Recycled Water," Section 6, 1st sentence) "During the use of the SMP to deliver water to <u>the</u> 	Staff agreed	Revisions were made to the permit

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		<p><u>Oxnard Plain PVCWD</u>, the AWPf treated recycled water will mix with variable amounts of brine including the flow discharged from the Camrosa’s Round Mountain Desalter Facility.”</p> <ul style="list-style-type: none"> • (Page 19, “Provisions,” Section 6, 1st sentence) “The Recycled water delivered to the Pleasant Valley <u>Oxnard Plain</u> users through the SMP will contain variable amounts of brine, including the flow discharged from Camrosa’s Round Mountain Desalter facility.” • (Page T-1, “Purpose of Amended Monitoring and Reporting Program for Order No. R4-2011-0079-A01 and Order No. R4-2008-0083,” Paragraph 1, 3rd sentence) “Instead, PVCWD growers requested that the water be transported into the PVCWD’s irrigation distribution system <u>and to the Oxnard Plain</u> immediately via the Calleguas Regional Salinity Management Pipeline (SMP) until the planned permanent connection can be constructed or additional flows into the SMP render the option not feasible, whichever comes first. • (Page T-4, “Reporting Requirements,” “1. Quarterly Reports,” Section 1.A.a, 3rd sentence) “During the use of the SMP to distribute the AWPf treated recycled water to PVCWD, the average daily flow rate pumped into the SMP shall also be reported, as well as the flow rate at each connection to the FVCWD <u>PVCWD</u> irrigation network.” 		
Comments received from United Water Conservation District (UWCD) on June 15, 2015				
United Water Conservation District	U-1	Title page, Paragraph 2 UWCD does not oppose the delivery of recycled water from the City of Oxnard’s Advanced Water Purification Facility (A WPF) that is part of the City’s Groundwater Recovery, Enhancement and Treatment (GREAT)	Comment noted. Revisions have been made to address concerns noted in letter. See below.	Revisions have been made to the permit

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		<p>program to Pleasant Valley County Water District's distribution system via the Calleguas Regional Salinity Management Pipeline (SMP) until the planned permanent connection can be constructed or additional flows into the SMP render the option not feasible, whichever comes first.</p>		
	U-2	<p>Title page, Paragraph 4 and Page 2, Paragraph 1 and 2. But, the following information and clarification should be part of the official record and discussion:</p> <ul style="list-style-type: none"> • UWCD is a named party (although not yet a signatory) to the City of Oxnard's Full Advanced Treatment Recycled Water Management and Use Agreement, and is mentioned several times as an agricultural irrigation user in Order No. R4-2011-0079-A01. However, the District has not been included in any of the discussions over the last six months regarding the use of the SMP. In fact, the District is not even included on the mailing list of the May 14, 2015 letter from the LARWQCB's letter to the City Manager of Oxnard regarding notice of the order (Order No. R3-2011-0079-A01 Amending Order No. R4-2008-0083). • We also note that no representative from the Fox Canyon Groundwater Management Agency (FCGMA), a key player in Ventura County's groundwater management efforts (and the designated Groundwater Sustainability Agency (GSA) under the Sustainable Groundwater Management Act of 2014- for the basins impacted by this order) has been included in the discussions or on the mailing list of the May 14, 2015 LARWQCB's letter. • This is unfortunate because UWCD and FCGMA, the two agencies with State mandated responsibility to protect the local groundwater 	<p>Comment noted. Staff agrees that both agencies Fox Canyon Groundwater Management Agency (FCGMA) and UWCD should be involved in ongoing development of recycled water resources.</p>	<p>UWCD will be added to the distribution list for all local recycled water projects.</p>

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		resources, could have provided some valuable insights to the overall role of the project in the County's future groundwater sustainability planning efforts.		
	U-3	<p>Page 2, Paragraphs 3 and 4 For example, in the INTRODUCTION section (page 2) for Order No. R4-2011-0079-A01 (paragraph 1) there is a sentence that states, "The GREAT Program would provide regional water supply solutions to Western Ventura County, all the groundwater basin to reach safe yield levels sooner (i.e. reducing the effects of groundwater overdraft conditions), and provide the City with local water resources."</p> <p>This statement, along with the over use of the term 'new water,' have been used to encourage State representatives to move quickly in advancing the use of the SMP. These statements in the middle of one of the most serious droughts in the State's history are compelling to anyone not aware of the facts, but the statements are misleading and could result in future disagreements as local parties structure a groundwater sustainability plan. UWCD wants to provide clarification so no one mistakenly believes the GREAT Phase I project will, as currently configured, solve our local water problems. While this is a local, not a Regional Board issue, the Regional Board (and others who have lent their support to this project) should be aware of some of the facts of what this program could and won't do.</p>	<p>The sentence from the introduction was written in 2011 during the development of the GREAT program and was subject to public comment at that time. Staff has not represented in this Order that GREAT phase I project can solve all local water problems.</p> <p>Staff concurs that groundwater management is a local issue. The Regional Water Board supports the Sustainable Groundwater Management Act of 2014, signed by Governor Brown on Sept. 16, 2014 and Resolution No. 2013-02 of the Fox Canyon Groundwater Management Agency (GMA). In the Sustainable Groundwater Management Act the legislature recommends the development of local groundwater management plans. The GMA is a plan implemented by the Fox Canyon GMA with support from UWCD, PVCWD and the City of Oxnard during the first phase of the City of Oxnard's GREAT Program.</p> <p>To address concerns raised by UWCD, Finding 29 has been added to the Order. In addition, reporting requirements have been modified to include Fox Canyon GMA reports and III.7 has been modified to include:</p> <p>"If the Regional Board finds that the temporary use of the RSMP contributes to the degradation of groundwater quality, the Regional Board may also terminate or modify the WDR at a subsequent Regional Water Board meeting."</p>	Revisions were made to the permit

Commenter	#	Comment	Response	Action Taken
	U-4	<p>I will be attending the July 9, 2015 Public hearing for Order No. R4-2011-0079-A01 and respectfully request the Regional Board to grant me up to 15 minutes to provide this clarification and to present the recycled water delivery agreement deal points via powerpoint presentation from the groundwater resource management perspective. I believe this request is reasonable given that UWCD/FCGMA not being included in the discussions leading up to this order and not being included in the mailing list but only receiving the notice from a third party.</p> <p>Again, we are not opposing the use of the Calleguas SMP, which is a technical issue for the Regional Board and its staff. We have no argument with the technical data that has been presented to date. How the project has been 'sold' to State officials to expedite the use of the SMP does present potential confusion as our area moves forward in complying with the Sustainable Groundwater Management Act.</p>	Your time request during the Board Hearing will be considered by the Executive Officer in consultation with the Regional Board during evaluation of the time constraints present at the hearing.	None necessary
	U-5	<p>Page 3, Paragraphs 2 and 3</p> <ul style="list-style-type: none"> • UWCD/FCGMA are mandated by the State of California to resolve the critical overdraft in Ventura County that has manifested into substantial seawater intrusion, causing increasing water quality and supply damage to our groundwater resources. • Side or 'special' deals, along with trying to accommodate everyone's needs for financial reasons, has long been the problem in Ventura County that has continued the average 30,000 acre-feet annual over-drafting of the basins in spite of the 25 year State mandate to resolve the problem. In the last two years alone, the overdraft has been 100,000 acre-feet and more, each year. 	Comments noted.	None necessary

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	U-6	<p>Page 3, Paragraph 4</p> <ul style="list-style-type: none"> The term 'new water' should reflect water that resolves the overdraft problem i.e. leaving water in the ground, not water that expands water use and continues the over commitment of the resource. Using recycled water where it has not been used before is a good start. However, using recycled water and simultaneously allowing the same level of groundwater pumping that has maintained the critical overdrafting of the basins is not 'new water.' This will make regional sustainability more difficult to achieve and more expensive for those who haven't locked up special subsidized water deals for themselves. • 	<p>The term 'new water' does not appear in the Tentative Order.</p> <p>To address the concern of groundwater degradation, Finding # 29 has been added to the Order:</p> <p>“Regional Board encourages Oxnard to work with all parties of the GREAT agreement to maximize the benefits of recycled water delivery for region-wide benefits, especially groundwater levels and quality.</p> <p>Regional Water Board recognizes that groundwater management is a local issue. The Regional Board supports the Sustainable Groundwater Management Act of 2014 (GMA), signed by Governor Brown on Sept. 16, 2014, in which the legislature recommends the development of local groundwater management plans. UWCD and FCGMA and local water agencies created Resolution No. 2013-02 of the Fox Canyon Groundwater Management Agency (FCGMA) and signed it on June 26, 2013 to address the implementation of the first phase of the GREAT program through a collaborative process. The Regional Board encourages FCGMA, as the GMA lead, to coordinate recycled water use, surface water use, and groundwater use for regional benefit.”</p>	Revisions were made to the permit
	U-7	<p>Page 3, Paragraph 5</p> <ul style="list-style-type: none"> An additional significant concern of UWCD is that at present, UWCD and the Pleasant Valley County Water District (PVCWD) have not reached an agreement allowing PVCWD to place this recycled water into UWCD's two reservoirs. The reservoirs serve as an integral part of PVCWD's distribution system. The parties' existing agreement does not provide for this type of use of the UWCD 	Comment noted.	None necessary

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		reservoirs, and PVCWD may not use the UWCD reservoirs absent UWCD's consent. PVCWD has been aware of this issue for some time and to date, no agreement has been reached.		
	U-8	Page 3, Paragraph 6 Using recycled water, with no or limited transfers of pumping authorization from the GREAT program, along with a proposed brackish water project by UWCD, are two of the key strategies that are being considered to leave water in the ground to eliminate (or at least reduce) the over-draft and work toward achieving sustainability. The costs of these projects alone are significant and spreading the costs fairly will be a key component of the future success of the Groundwater Sustainability Plan for the Oxnard Plain Basin.	Comment noted.	None necessary
Comments received from Fox Canyon Groundwater Management Agency on June 12, 2015				
Fox Canyon GMA	F-1	Fox Canyon GMA supports the Tentative Order with the following comments and suggested revisions: <ul style="list-style-type: none"> • Page 2, Section 1, 5th sentence, should have the following removed. "would provide regional water supply solutions to western Ventura County, allow the groundwater basin to reach safe yield levels sooner (i.e., reducing the effects of groundwater overdraft conditions), and." • Page 4, Section 10, last paragraph, 1st sentence, should change "will" to "may", resulting in "The use of recycled water <u>may</u> replace imported potable water." 	Staff agreed.	Revisions were made to the permit
Comments received from Ventura County Coalition of Labor, Agricultural and Business on June 15, 2015				
CoLAB	Co-1	CoLAB supports this Order, and suggests the following resolutions with respect to the GREAT Program: The following language:	Comments noted. Thank you for pointing out the Fox Canyon GMA Resolution No. 2013-02 and your comment that this resolution has "provided the	None necessary

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		<p>“Whereas, the GMA Management Plan describes the use of RW generated from the GREAT Program as an important management strategy that will result in improvements to water supply reliability and water quality conditions within the Agency; and..</p> <p>Whereas, the primary benefits of the GREAT Program include: (a) generation of approximately 7,000 AFY of <u>new water supplies for the region</u>; (b) increased use of supplemental water supplies and the <u>concomitant reduced groundwater pumping in the areas of the Oxnard Plain and Pleasant valley subbasis</u>; (c) introduction of RW into the Pumping Trough Pipeline (PTP) and Pleasant Valley County Water District (PVCWD) <u>systems which will increase United water Conservation District’s (UWCD) ability to recharge surface water to the Forebay under certain conditions</u>; (d) <u>shifting groundwater pumping from the coastal and Pleasant Valley areas that are most difficult to recharge, to the Forebay/Near Forebay, which is easily recharged</u>; (e) <u>overall increase in groundwater recharge</u>; and (f) <u>the removal of tons of salts from the Oxnard Plain and Forebay groundwater</u>; and....</p> <p>Whereas, UWCD, PVCWD and the City have developed a plan to utilize RW within the UWCD PTP and PVCWD (“PV”) distribution systems, <u>along with direct delivery of RW to agricultural users along the pipeline alignment (collectively, “RW users”)</u>; and...”</p> <p>Section 2(c) specifically requires: “Limitation and restrictions on Forebay pumping based on groundwater level triggers and Hydrogeological conditions.”</p> <p>Section 12(c) states “To the extent the Agency, the City and UWCD do not agree on restrictions on the use of RWPA for any given year, based on the then existing and anticipated hydrologic circumstances, <u>the</u></p>	<p>language and tools to implement the GREAT Program in a way that will utilize this new source of recycled water to benefit users while protecting the integrity of the groundwater basins”.</p>	

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		<p><u>City shall use the RWPA consistently with UWCD Board of Directors' determination in consultation with the Agency."</u></p> <p>Section 14 states: Unless otherwise authorized pursuant to the Coordination Meetings, <u>the City shall not pump its RWPA from the Forebay when evacuated groundwater from storage in the Forebay reaches 80,000 acre-feet (as regularly determined by UWCD), or groundwater levels in the Forebay reach 19 feet above mean sea level.</u> Resumption of pumping of RWPA from the Forebay shall occur as authorized pursuant to the Coordination Meetings as provided in Section 12."</p> <p>These amended orders with respect to the GREAT Program are necessary as defined in the purpose of Order No. R4-2011-0079-A01.</p>		
Comments received from Calleguas Municipal Water District on June 15, 2015				
Calleguas MWD	CM WD1	Calleguas MWD commends the efforts of the Regional Board and fully supports the tentative Order.	Thank you for your comment in support of this permit.	None necessary.
Comments received from Houweling's Tomatoes on June 15, 2015				
Houweling's	H-1	Houweling Nurseries commends the efforts of the Regional Board and fully supports the tentative Order.	Thank you for your comment in support of this permit.	None necessary.
Comments received from Ventura County Agricultural Water Quality Coalition on June 15, 2015				
Ventura County Agric. Water Quality Coalition	V-1	Ventura County Agricultural Water Quality Coalition commends the efforts of the Regional Board and fully supports the tentative Order.	Thank you for your comment in support of this permit.	None necessary.
Comments received from Ventura County Agricultural Association on June 15, 2015				

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Ventura County Agric. Association	V-2	Ventura County Agricultural Association commends the efforts of the Regional Board and fully supports the tentative Order.	Thank you for your comment in support of this permit.	None necessary.
Comments received from Assemblymember Jacqui Irwin on June 15, 2015				
Jacqui Irwin	J-1	Assembly member Irwin commends the Regional Board and fully supports the AWPf use of the SMP to deliver high quality recycled water to agricultural customers in the Oxnard plain.	Thank you for your comment in support of this permit.	None necessary.