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December 18, 2013

Mr. Eric Oppenheimer, Director  
Office of Research, Planning, and Performance  
([eric.oppenheimer@waterboards.ca.gov](mailto:eric.oppenheimer@waterboards.ca.gov))  
State Water Resources Control Board  
1001 I Street, 16<sup>th</sup> Floor  
Sacramento, CA 95812

Dear Mr. Oppenheimer:

Subject: Comment Letter – Draft Groundwater Workplan Concept Paper

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to submit comments on the State Water Resources Control Board's (SWRCB's) Draft Groundwater Workplan Concept Paper. LADWP is a municipal utility that is both a water provider and a discharger to surface waters and groundwater as part of its day to day operations. As a water supplier, LADWP provides over 170 billion gallons of water annually to approximately 4 million residents of the City of Los Angeles, with approximately 18 billion gallons coming from in-City wells. Therefore, LADWP has interest in quality of the groundwater. As an environmental steward, LADWP supports measures that protect the beneficial uses of both surface waters and groundwater. To this end, LADWP continues to work with the State and the USEPA to implement activities that enhance groundwater protection, such as Low Impact Development, Best Management Practices, and permit compliance measures.

In general, LADWP supports the elements of the Groundwater Workplan Concept Paper, which include 1) sustainable thresholds, 2) monitoring and assessment, 3) governance and management, 4) funding, and 5) oversight and enforcement. LADWP suggests the following:

- Section 3.1 – When developing sustainability thresholds, reference levels for pollutants, legacy pollutants, and historical groundwater levels need to be developed using monitoring data in order to establish a baseline for comparison with management options.
- Section 3.2 – LADWP suggests monitoring and assessment should include surface waters, because of their relation to underlying aquifers.
- Section 3.3 – Activities related to Municipal Separate Storm Sewer System (MS4) Permits should be specifically included.

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LADWP understands this is a framework and more details will follow. However, a one size fits all policy may not be appropriate; rather, the Workplan should be broken down by region or watershed. This is because pollutants and their remediation are region-specific, such as with salts and nutrients, or volatile organic compounds. Pollutants in different regions may have different sources, and may be naturally-occurring, with different available options for remediation.

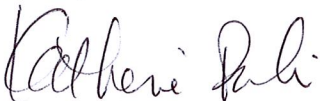
Furthermore, LADWP believes that a Groundwater Workplan should address surface water quality and the relation to groundwater quality issues. LADWP protects surface waters and ground waters through compliance with NPDES and Waste Discharge Requirements Permits, including the Los Angeles Municipal Separate Storm Sewer System (MS4) Permit. LADWP is also involved with many of the other items in Table 3.3 of the Draft Concept document.

Also, LADWP believes stakeholder involvement is needed in order to identify the important issues to be included in a Groundwater Workplan. LADWP requests that the SWRCB conduct frequent stakeholder workshops to identify and address issues such as natural pollutants in groundwater (salts and nutrients), definition of sustainable drawdown, development of thresholds, and antidegradation of groundwater. Furthermore, these may not be the only problems that need to be addressed; water conservation, reuse, and sustaining existing wetlands are other issues that may be considered. A problem statement and a list of issues for each region needs to be developed through stakeholder discussion.

Lastly, the Groundwater Workplan should also have regional flexibility to allow for differing characteristics of groundwater and aquifers throughout the State. SWRCB should avoid applying one set of requirements and thresholds over the entire State. LADWP agrees with concepts that protect the environment and keep aquifers at a high quality; however, LADWP still needs to operate under policies that can provide its ratepayers a sustainable, safe, and economical water supply.

LADWP looks forward to participating in future workshops in the development of the Groundwater Workplan. If there are any questions, please give me a call at (213) 367-0436.

Sincerely



Katherine Rubin  
Manager of Wastewater Quality and Compliance

CY:lr

Via email

c: Ms. Gail Linck ([gail.linck@waterboards.ca.gov](mailto:gail.linck@waterboards.ca.gov))

Mr. Clayton Yoshida

Mr. Michael Hanson