
Santa Ana Regional Water Quality Control Board

June 22, 2020

VIA EMAIL ONLY

Mr. Mark Norton
Water Resources & Planning Manager
Santa Ana Watershed Project Authority
11615 Sterling Ave.
Riverside, CA 92503
mnorton@sawpa.org

**REGIONAL BOARD COMMENTS ON THE MONITORING PROGRAM TASK FORCE
DRAFT TECHNICAL MEMORANDUM “RECOMPUTATION OF AMBIENT WATER
QUALITY FOR THE PERIOD 1999 TO 2018”**

Dear Mr. Norton:

The Santa Ana Regional Water Quality Control Board (Regional Board) staff have reviewed the above referenced draft technical memorandum dated April 15, 2020 submitted by Water Systems Consulting, Inc. on behalf of the Santa Ana Watershed Project Authority and the Basin Monitoring Program Task Force (Task Force; BMPTF). In addition to editorial comments made on May 29, 2020, the Regional Board respectfully submits the following response to the recommendations made in the draft technical memorandum for the Task Force’s consideration.

The State Water Resources Control Board’s Water Quality Control Policy for Recycled Water (Recycled Water Policy) was amended effective April 9, 2018. The goal of the Recycled Water Policy is to support water supply diversity and sustainability and to encourage the increased use of recycled water in California. Changes to the Recycled Water Policy include requirements for regional water boards and proponents of recycled water projects across the state to develop salt and nutrient management plans (SNMPs). The Recycled Water Policy is directly influenced and inspired by the cooperative efforts of stakeholders in the Santa Ana Region and the salt and the nutrient management practices developed here.

One requirement of the RWP is that the regional water boards, in consultation with stakeholders, shall assess and review monitoring data generated from SNMPs every five years unless an alternate timeline has been established in a basin plan amendment. This assessment shall include an evaluation of:

WILLIAM RUH, CHAIR | HOPE SMYTHE, EXECUTIVE OFFICER

- observed trends in water quality data as compared with trends predicted in the salt and nutrient management plan;
- the ability of the monitoring network to adequately characterize groundwater quality in the basin;
- potential new data gaps;
- groundwater quality impacts predicted in the salt and nutrient management plan based on most recent trends and any relied-upon models, including an evaluation of the ability of the model to simulate groundwater quality;
- available assimilative capacity based on observed trends and most recent water quality data; and
- projects that are reasonably foreseeable at the time of this data assessment but may not have been when the salt and nutrient management was prepared or last updated.

The Regional Board disagrees with the recommendation that the next ambient water quality computation and assimilative capacity determination be conducted for the period 2006-2025. Salt and nutrient management plans adopted as a Basin Plan amendment prior to April 8, 2019, such as the Santa Ana Region SNMP, shall be evaluated for compliance with the Recycled Water Policy by April 8, 2024. The current Santa Ana River Basin Plan requires triennial reporting of the ambient water quality and assimilative capacity in management zones in the watershed, which is more rigorous than a 5-year schedule. While the Regional Board generally agrees with the recommendation to shift the reporting requirements to more closely match the 5-year schedule described in the RWP, until this evaluation is completed the current triennial SNMP compliance schedule must continue. Therefore, the next recomputation of ambient water quality will evaluate the 20-year period 2002-2021.

The Regional Board urges the Task Force to act on those recommendations in the AWQ report that would mitigate potential data gaps and analyze 'hot-spots' as a proactive step to achieve compliance with the RWP requirements. The Regional Board recognizes that the loss of point statistics can have an outsized impact on the ambient water quality determination for a management zone depending on the spatial distribution of monitoring points. Member agencies should take all practicable steps to augment the monitoring networks within their spheres of influence.

The Regional Board suggests that the Task Force continue to meet regularly to explore the results depicted by the Interpretive Tools in the above referenced technical memorandum on a basin-by-basin basis, and to discuss Recycled Water Policy compliance in preparation for the April 2024 evaluation deadline.

Periodically updating the physical characteristics of the management zones, including aquifer geometry and storage parameters, is a regulatory priority. The Regional Board is aware of multiple groundwater basin modeling efforts since the last update to the watershed conceptual model (TIN/TDS Phase 2A: TIN/TDS Study of the Santa Ana Watershed, July 2000). The accuracy of our salt and nutrient monitoring program metrics

has a direct impact on the allocation of assimilative capacity, discharge permit limits, and on the many beneficial uses affected by the active management of groundwater resources in the Santa Ana watershed.

Thank you for the opportunity to comment on this draft technical memorandum. The Regional Board values the collaborative efforts of SAWPA and the Basin Monitoring Program Task Force member agencies on this important work.

If you have any questions regarding this letter, you may contact me at (951) 782-3219 (eric.lindberg@waterboards.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Eric Lindberg', with a stylized flourish extending to the right.

Eric Lindberg PG, CHG
Senior Engineering Geologist/Unit Chief
Santa Ana Regional Water Quality Control Board