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February 5, 2016

Mark Norton
Water Resources & Planning Manager
Santa Ana Watershed Project Authority
11615 Sterling Avenue
Riverside, CA 92503-4979

Subject: CDA Comments on the *Petition to Revise Water Quality Objective for Nitrate-Nitrogen in the Chino-South Groundwater Management Zone*

Dear Mr. Norton:

The Chino Basin Desalter Authority (CDA) appreciates the opportunity to submit comments on the October 27, 2015 draft document entitled "Petition to Revise Water Quality Objective for Nitrate-Nitrogen in the Chino South Management Zone" (Petition).

The CDA has invested over \$400 million in wells, conveyance facilities and groundwater treatment facilities to recover about 40,000 acre-ft/yr of degraded groundwater from the southern part of the Chino Basin, which includes the Chino-South groundwater management zone (GMZ). The CDA treats the groundwater to remove nitrate, TDS, and industrial solvents to put the groundwater to beneficial use as a local supply of drinking water. The Santa Ana River (SAR) is an important source of recharge to the Chino-South GMZ, and hence the CDA well fields. As such, the flow and quality of the SAR are of concern to the CDA. The CDA desires to collaborate with all stakeholders in the watershed to achieve optimal and equitable management and regulation of the flow and quality in the SAR.

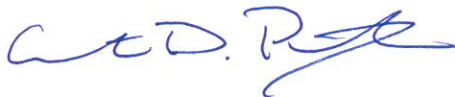
The Petition proposes to raise the nitrate-nitrogen concentration objective for the Chino-South GMZ from 4.2 mg/L to 5.0 mg/L. This higher objective can result in increased nitrogen loads from the SAR to the CDA well fields, and increased costs to treat the additional nitrogen. The Petition does not quantify these potential impacts to the CDA. Hence, the CDA performed an independent analysis of the potential impacts. The analysis indicates that the higher objective can potentially increase the nitrate mass in CDA production by about 100 tons per year.

The CDA does not view this potential increase the nitrate mass as a significant adverse impact on CDA operations at this time provided that the nitrogen losses that occur in streambed recharge occur as assumed in the wasteload allocation. That said, the CDA recommends that the Task Force and the Regional Board explore the following other options listed in the Petition, instead of immediately pursuing a revised Basin Plan objective that locks in the potential for future degradation:

- Use the long-term 63-year average of the Wasteload Allocation Model results, rather than the 10-year average, to evaluate compliance with the nitrate-nitrogen objective in the Chino-South GMZ. The Chino Basin is relatively large, and can buffer the shorter-term increases in nitrate concentrations in streambed recharge that are related to drought. The long-term 63-year average nitrate-nitrogen concentration in SAR recharge is predicted to be about 4.1 mg/L, which is less than the objective of 4.2 mg/L. The CDA considers the predicted nitrate-nitrogen concentration in SAR recharge as essentially compliant with the Basin Plan, again provided that the nitrogen losses that occur in streambed recharge occur as assumed in the wasteload allocation.
- Perform a new science-based investigation to determine nitrogen losses through streambed recharge into the Chino-South GMZ. This should be done as a condition of increasing the nitrate-nitrogen objective. We recommend that the Regional Board defer increasing the nitrate-nitrogen objective until this investigation is completed and allow the dischargers to discharge at current nitrogen levels provided that the investigation is completed time certain. It is our understanding that this is the same concept used by the predecessor of the Basin Monitoring Program Task Force when the TDS and nitrogen plan was originally developed and subsequently included in the Basin Plan in 2004.

We appreciate the patience from the Task Force in allowing us sufficient time to review the Petition, analyze the potential impacts to the CDA, and offer the suggestions herein to address this important regulatory compliance issue.

Sincerely,



Curtis D. Paxton
General Manager/CEO

cc: Joe Grindstaff (IEUA)
Peter Kavounas (CBWM)