

Additional Comment Summary and Responses
Incorporation of Stakeholder-Developed Groundwater Quality Management Measures for Salts and Nutrients in the Upper Santa Clara River
Groundwater Basin

Table 1: Commenters

5. Newhall County Water District

Table 2: Comments and Responses

No.	Commenter	Comment	Response
5.1	Newhall County Water District (NCWD)	<p>NCWD is committed to water efficiency and conservation. This includes planning for a robust water reuse portfolio which includes but is not limited to recycled water and indirect potable reuse.</p> <p>NCWD worked alongside Castaic Lake Water Agency (CLWA), the City of Santa Clarita (City), the Santa Clarita Water Division (SCWD), Los Angeles County Flood Control District (LACFCD), San Gabriel & Lower Los Angeles Rivers and Mountains Conservancy, Santa Clarita Valley Sanitation District (SCVSD), Valencia Water Company (VWC), various other stakeholders, consultants, and regulatory agencies in the preparation of the Upper Santa Clara River Basin Salt and Nutrient Management Plan (SNMP).</p>	Comment noted.
5.2	NCWD	As stated in Section 1.2 of the SNMP, Water Quality Objectives (WQOs) do not exist for the Saugus Formation. The Regional Board proposes to apply the most conservative WQOs from the alluvial subunits to the Saugus Formation. NCWD disagrees with this determination. Instead, NCWD would recommend the Regional Board include in Tentative	Groundwater quality in the Saugus Formation is primarily influenced by the quality of water seeping downward from overlying alluvial basins and from recharge due to precipitation. However, as recognized by the commenter, the Saugus Formation does not have established basin-specific water quality objectives for TDS,

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		<p>Resolution No. R16-0XX, the language specified in the SNMP. The SNMP states, "The significant variability of water quality in the Saugus Formation needs to be further evaluated to establish meaningful WQOs." Rather than selecting arbitrary WQOs for the Saugus Formation, NCWD encourages the Regional Board to focus on determining what further analysis is required to provide the necessary information to set meaningful WQOs.</p>	<p>chloride, and sulfate. In the case of nitrate, a single water quality objective applies to all groundwater basins.</p> <p>Therefore, during Salt and Nutrient Management Plan development, the most conservative water quality objectives from the overlying basins were used as the default values to assess water quality conditions, estimate available assimilative capacity, and model the projected impact of management measures on the management zone – for TDS and chloride.</p> <p>This initial approach was necessary in order to move forward with the planning effort. It is also reasonable considering the upward leakage from the Saugus Formation to the overlying alluvial aquifers.</p> <p>However, this approach was not utilized in the analysis of sulfate since available historical sulfate concentrations obtained from wells in the Saugus Formation showed levels of sulfate higher than the water quality objectives of the overlying alluvial units. This concentration difference may be as a result of natural sources.</p> <p>Development of the SNMP highlighted the need for basin-specific mineral water quality objectives for the Saugus Formation. This was one of the projects considered during the most recent Triennial Review, and is likely to be selected as one to be addressed in the 2017-19</p>

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			<p>Triennial Review.</p> <p>Therefore, no changes to the Tentative Resolution or the proposed Basin Plan amendment are necessary.</p>
5.3	NCWD	<p>In concurrence with the current plans for the expansion of recycled water use and the Santa Clarita Valley Family of Water Supplier's 2015 Water Use Efficiency Strategic Plan, NCWD is committed to the goal of developing local water reuse projects for the Santa Clarita Valley. We look forward to working collaboratively with the Regional Board, various stakeholders, and other regulators to make these projects a reality. To that end, NCWD believes amendments to the SNMP and Basin Plan will be necessary in the future to achieve this goal.</p> <p>We look forward to working collaboratively with the Regional Board, various stakeholders, and other regulators to make these projects a reality.</p>	<p>Comment noted. Also, see response to Comment No. 5.2.</p>