



NEWHALL COUNTY WATER DISTRICT

23780 North Pine Street • P.O. Box 220970 • Santa Clarita, CA 91322-0970
(661) 259-3610 Phone • (661) 259-9673 Fax • email: mail@ncwd.org

Directors: B. J. ATKINS, *President* MARIA GUTZEIT, *Vice President* KATHY COLLEY DANIEL MORTENSEN LYNNE A. PLAMBECK

October 11, 2016

California Regional Water Quality Control Board
Los Angeles Region
Attn: Dr. Ginachi Amah
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

2016 OCT 14 PM 2:08
CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

Re: Public Comment on the Tentative Resolution for the proposed Amendments to the Basin Plan to Incorporate a Program of Implementation Consisting of Stakeholder-Developed Groundwater Quality Management Measures for Salt and Nutrients in the Upper Santa Clara River Basin

Newhall County Water District (NCWD) appreciates the opportunity to comment on the Notice of Hearing for Salts and Nutrients in the Upper Santa Clara River Groundwater Basin. 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. 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).

NCWD appreciates the collaborative efforts the Los Angeles Regional Water Quality Control Board (Regional Board) provided during the preparation of the SNMP. Please accept the following comments as a matter of record in response to the Notice of Public Hearing for Proposed Amendments to the Basin Plan to Incorporate a Program of Implementation Consisting of Stakeholder-developed Groundwater Quality Management Measure for Salt and Nutrients in the Upper Santa Clara River Basin.

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 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.

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.

We look forward to working collaboratively with the Regional Board, various stakeholders, and other regulators to make these projects a reality.

Sincerely,

Newhall County Water District



Stephen L. Cole
General Manager