



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE
Chief Engineer and General Manager

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Via Electronic Mail

Dr. Céline Gallon
California Regional Water Quality Control Board
Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

Dear Dr. Céline Gallon:

**Comments on the 2014-2016 Triennial Review
Selection of Los Angeles Basin Planning Priority Projects**

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to submit comments to the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) on the selected priorities for the 2014-2016 Triennial Review of the Water Quality Control Plan – Los Angeles Region (Basin Plan), as proposed in the Tentative Resolution and Staff Report released September 2, 2015. The Sanitation Districts are pleased to support the continued development of Salt and Nutrient Management Plans (SNMPs) and the administrative update to Chapter 4 of the Basin Plan as Basin Planning priority projects. Furthermore, we have recommendations regarding the project to reconsider recreational beneficial use designations and the project to consider a high flow suspension of recreational beneficial uses in the Santa Clara River and other waterbodies. The comments relating to these projects are discussed in more detail below.

Salt and Nutrient Management Plans

The State Water Resources Control Board's (State Water Board's) Recycled Water Policy requires that every groundwater basin and sub-basin in California have a SNMP. The Recycled Water Policy clarifies that the SNMP development process should be stakeholder-led with Regional Boards throughout the state providing oversight and regulatory guidance as necessary. As part of the 2008-2010 Triennial Review, the Regional Board directed staff to assist in the development of SNMPs in the Los Angeles region. Since that time, the Regional Board has attended stakeholder meetings, held various stakeholder workshops, provided support and information, and developed the guidance document "*Regional Water Board Assistance in Guiding Salt and Nutrient Management Plan Development in the Los Angeles Region*". Additionally, the Regional Board incorporated the Central Basin and West Coast Basin SNMP and the Lower Santa Clara River SNMP into the Basin Plan and created Basin Plan Chapter 8 "Groundwater Quality Management – Sustainability and Basin-specific Protection of Groundwater" to accommodate the SNMPs and future salt and nutrient management measures. The Sanitation Districts appreciate the Regional Board's efforts thus far related to the SNMPs and support the inclusion of the continued support of the development of SNMPs as a Basin Planning priority. The Sanitation Districts

believe this project is important, especially given that there are five groundwater basin groups still in the process of developing their plans.

Basin Plan Administrative Update

The Sanitation Districts' are pleased that the Regional Board is proposing to continue work on the non-regulatory amendments to the Basin Plan. During the 2011-2013 Triennial Review period, the Regional Board adopted three resolutions updating Chapter 2 "Beneficial Uses", Chapter 3 "Water Quality Objectives", and Chapter 7 "Total Maximum Daily Loads" of the Basin Plan. In addition, on October 9, 2014 the Regional Board adopted a resolution updating Chapter 1 "Introduction", Chapter 5 "Plans and Policies", and Chapter 6 "Monitoring and Assessment" of the Basin Plan. The Sanitation Districts support the Regional Board's proposal to include the administrative update of Chapter 4 "Strategic Planning and Implementation" as a priority project for the 2014-2016 Triennial Review, a chapter that has not been updated. There have been numerous Basin Plan amendments in the past and well as new information available and the Sanitation Districts appreciate the Regional Board's effort to update the document in order to create an improved and complete plan. The Sanitation Districts also commend the Regional Board's commitment to continue the administrative update until all chapters of the Basin Plan have been updated, and support administratively updating the Basin Plan on a more routine basis going forward.

Application of REC-1 and REC-2 Beneficial Use Designations

The Regional Board identified reconsideration of the application of recreational (i.e. REC-1 and REC-2) beneficial use designations as a priority project for the 2008-2010 Triennial Review. The Sanitation Districts recognize that the Regional Board adopted Resolution R14-011 relating to the study results and findings for the engineered portions of the Los Angeles River watershed. However, the Sanitation Districts believe that assessing recreational uses region-wide is important; therefore, we recommend that this effort continue for other watersheds, including the San Gabriel and Santa Clara River watersheds, as well as non-engineered channels.

High Flow Suspension of Recreational Beneficial Use Designations

The Regional Board adopted R03-010 in 2003, which created a new "High Flow Suspension" category that describes when recreational beneficial use designations and the associated bacteriological objectives are applicable during and following periods of high rainfall. However, this application has been limited to certain portions of the Ballona Creek, Dominguez Channel, Los Angeles River, and San Gabriel River Watersheds. As part of the 2014-2016 Triennial Review, the City of Santa Clarita requested that the Regional Board expand the evaluation of recreation beneficial use designations due to rainfall to the Santa Clara River. The Sanitation Districts see merit in this the project and support the City of Santa Clarita's request to include this as a priority project for the 2014-2016 Triennial Review. Furthermore, the Sanitation Districts also support this assessment in general and recommend that the Regional Board continue the evaluation of high flow suspension of recreational beneficial uses in Ventura County after the Santa Clara River assessment. The Sanitation Districts recognize that the Staff Report states that the Regional Board is not pursuing this project due to resource constraints and the State Water Board's intention to develop bacterial objectives; however, it is uncertain if the State Water Board will be considering high flow suspension implementation provisions and work has already been initiated on the Ventura County evaluation. For these reasons, we request that the continued evaluation of high flow exceptions is a priority project for the 2014-2016 Triennial Review.

In summary, the Sanitation Districts support the continued effort for development of the Salt and Nutrient Management Plans (SNMPs) and the administrative update to Chapter 4 of the Basin Plan as Basin Planning priority projects. Furthermore, we encourage the Regional Board to consider our

recommendation to further continue the reconsideration of the application of recreational beneficial use designations and high flow suspension category. If you have any questions, please contact Shannon Bishop of my staff at (562) 908-4288, extension 2843.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Ann Heil".

Ann Heil
Monitoring Section Head
Technical Services Department

ATH:AJH:SAB:lmb