

Castaic Lake Water Agency City of Santa Clarita Newhall County Water District Santa Clarita Valley Sanitation District Valencia Water Company Castaic Lake Water Agency, Santa Clarita Water Division Los Angeles County Flood Control District San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy

March 2, 2015

Samuel Unger, Executive Officer California Regional Water Quality Control Board Los Angeles Region 320 W. 4th Street, Suite 200 Los Angeles, CA 90013

## **Subject:** Data Request for the Triennial Review of the Water Quality Control Plan-Los Angeles Region (Basin Plan)

Dear Mr. Unger:

The Upper Santa Clara River Integrated Regional Water Management Group (RWMG) appreciates the opportunity to provide data for possible consideration of revisions to water quality standards in the Basin Plan. Part of the RWMG's mission is to work collaboratively with all stakeholders in the Upper Santa Clara River Watershed, planning for the future of water in the Santa Clarita Valley (SCV) by reducing water demand, promoting proper resource stewardship, and protecting water quality while improving supply and reliability through the implementation of several strategies including increased use of recycled water.

Recycled water is forecast to be the major new supply of water in the 2010 Santa Clarita Valley Urban Water Management Plan (UWMP), which concludes that, with inclusion of criticallyneeded recycled water supplies, the region has adequate water to meet SCV demand through and beyond SCV build-out in 2050. In addition, the region is currently working on a Salt and Nutrient Management Plan (SNMP) to ultimately be adopted into the Basin Plan. As the SNMP is yet to be completed, we do not have the data at this time to support the changes to the Basin Plan standards we believe may be warranted to facilitate recycled water use while protecting the beneficial uses of the Santa Clara River. The region is working with Los Angeles Regional Water Quality Control Board (LARWQCB) staff to complete the SNMP, and we believe that by the time of its adoption by LARWQCB, there will be data available to justify the modification of water quality standards as necessary to help with the provision of recycled water. Therefore, we ask that you consider including in your Triennial Review priority list an item for adoption of the SCV SNMP with any water quality standards changes that may be identified in conjunction with the SNMP.

In addition to the SNMP, the City of Santa Clarita and Los Angeles County, in consultation with the RWMG, are embarking on an Enhanced Watershed Management Plan to address all of the pollutants currently on the 303(d) list, including but not limited to zinc and Escherichia coli bacteria. This effort will comprehensively address pollutants found in storm water through regional best management practices, green streets and other types of storm water infiltration best management practices. Therefore, the RWMG requests that all pollutants on the 303(d) list without a current Total Maximum Daily Load (TMDL), but anticipate a TMDL being developed in the future, be changed to the category of "being addressed by action other than a TMDL" in the Basin Plan.

The RWMG looks forward to continuing to work with the LARWQCB to ensure we protect beneficial uses, manage storm water quality and promote the development of the SCV's water recycling program.

Sincerely.

Dan Masnada CLWA General Manager Upper SCR IRWM Regional Water Management Group

cc: Castaic Lake Water Agency Board of Directors Newhall County Water District Board of Directors Ginachi Amah, Los Angeles Regional Water Quality Control Board Celine Gallon, Los Angeles Regional Water Quality Control Board