

## Los Angeles Regional Water Quality Control Board

July 23, 2013

Mary J. Jacobs, P.E.  
Planning Section  
Sanitation Districts of Los Angeles County  
1955 Workman Mill Road  
Whittier, CA 90601

### COMMENTS ON THE SANTA CLARITA VALLEY SANITATION DISTRICT DRAFT CHLORIDE COMPLIANCE FACILITIES PLAN AND ENVIRONMENTAL IMPACT REPORT

Dear Ms. Jacobs,

The Los Angeles Regional Water Quality Control Board (Regional Board) received the draft of the Santa Clarita Valley Sanitation District (SCVSD) chloride compliance facilities plan and environmental impact report (EIR) on April 25, 2013 and appreciates the opportunity to provide comments. Regional board staff has reviewed the document for compliance with the requirements of the Upper Santa Clara River Chloride TMDL<sup>1</sup> with a special emphasis on the alternative analysis, recommended project summary, and potential water quality impacts. Please consider the following comments on the draft chloride compliance facilities plan and EIR.

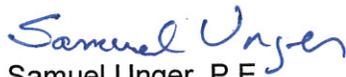
1. Staff notes that alternatives 1, 2 and 3 proposed in the draft EIR would bring SCVSD in compliance with the Chloride TMDL. However, alternative 4 may not achieve compliance with the existing TMDL waste load allocations. The existing TMDL requires SCVSD to either meet the current 100 mg/l chloride waste load allocations, or implement salt export projects as described in the original Alternative Water Resources Management (AWRM) in order to apply conditional chloride waste load allocations. As noted in the draft chloride compliance facilities plan and EIR, because Phased AWRM (alternative 4) would not require salt export projects until its second phase, its application would necessitate a modification of the Chloride TMDL and an amendment to the existing Basin Plan. Staff notes that the TMDL includes a reconsideration of the TMDL scheduled on November 4, 2014.
2. The final chloride compliance facilities plan and EIR should include additional detail and clarification regarding alternative 4.
  - The draft document mentions that chloride limits of 117 mg/l would apply during normal conditions and 130 mg/L would apply during drought conditions at the Ventura/Los Angeles County line (Reach 4B). Please ensure that the document also clearly states that a chloride objective of 100 mg/L would apply during all conditions in Reach 4A.
  - Clear triggers and implementation schedules need to be provided in the document for the commencement of Phase II of the Phased AWRM. The current document states that, "Phase II would only be built if Phase I does not consistently provide compliance with the chloride limit, and if the Bay Delta Conveyance Facility is not constructed in a timely

manner.” Please revise the document to describe what is meant by “consistently provide compliance” and “timely manner”. Referring to the Bay Delta Conveyance Facility, the current document states that “the most optimistic completion date for this project is 2025”, and considers 5 to 10 years possible delays in the cost analysis. Please provide a more precise estimation of the trigger or an alternative trigger that would start implementation of Phase II.

- Alternative 4 relies on the delivery of imported water to replace water pumped from the Saugus Formation to dilute effluent when chloride levels are peaking during drought. The document should evaluate whether an adequate volume of imported water would still be available for dilution of effluent if the Bay Delta Conveyance Facilities construction is delayed, as new developments in the area require increasing amounts of water from the local purveyors. The EIR should also analyze the California Water Code to ensure that use of imported water for chloride compliance does not constitute a waste and unreasonable use of water.
  - Please provide more detail on the extent of the salt management facilities in Ventura County. The document states that the facilities will operate to ensure a blend having a chloride level below 100 mg/L in Reach 4A, however it also indicates that “well field operation may be constrained to limit impacts to neighboring groundwater pumpers and biological resources in the SCR”, and that “the scope of the final facilities may be different than described”, as negotiations are ongoing with Ventura County stakeholders. Because the phased AWRM approach would be contingent on the improvement of the local groundwater conditions, the scope of the salt management operations needs to be better defined.
3. Section 16.4.3.1 of the draft environmental impact report finds that “the construction and operation of Phase I of alternative 4 would not violate applicable water quality standards or waste discharge requirements or otherwise substantially degrade water quality.” However, alternative 4 may not meet waste load allocations specified in the existing TMDL and Phase II may need to be implemented to attain water quality standards. This should be clarified in the final EIR.
  4. Please include a discussion, in the cumulative effects section or other location in the final EIR, of the potential impacts of SCVSD’s plans to accept wastewater from the proposed Newhall Ranch development at the Valencia Water Reclamation Plant during the initial phases of the Newhall development before the Newhall Water Reclamation Plant is operational.

Thank you for considering our comments when generating the final chloride compliance facilities plan and EIR. Please contact Jenny Newman (213-576-6691) or Céline Gallon (213-576-6784) if you have any questions or comments.

Sincerely,



Samuel Unger, P.E.  
Executive Officer