



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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File No. 31-370-40.4A

Mr. Yanjie Chu  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4th Street, Suite 200  
Los Angeles, CA 90013

Dear Mr. Chu

## **Comments on the Proposed Amendment to the Water Quality Control Plan for the Los Angeles Region to Incorporate a TMDL for Bacteria in the Santa Clara River**

The Santa Clarita Valley Sanitation District of Los Angeles County (Sanitation District) would like to thank the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) for the opportunity to provide comments on the proposed amendment to the Water Quality Control Plan for the Los Angeles Region (Basin Plan) to incorporate Total Maximum Daily Loads for indicator bacteria in the Santa Clara River Estuary and Reaches 3, 5, 6 & 7 (TMDL). The Sanitation District owns and operates the Valencia and the Saugus Water Reclamation Plants (WRPs) located within the Santa Clarita Valley, which serve the wastewater needs for approximately 230,000 people in the City of Santa Clarita and surrounding unincorporated areas. The WRPs provide tertiary level treatment to produce recycled water that is reused for landscape irrigation or discharged to the Santa Clara River.

The Sanitation District has reviewed the proposed TMDL and corresponding Staff Report and has several concerns. Specifically, the *Substitute Environmental Documents for the Santa Clara River and Santa Clara River Estuary Bacteria Total Maximum Daily Load* (SEDs) do not adequately address the environmental impacts of wet weather compliance, the TMDL lacks necessary beneficial use suspensions, and the reference system and TMDL lack appropriate consideration of wildfires. These concerns are described in detail below.

### **Substitute Environmental Documents**

The SEDs do not adequately address the environmental impacts of compliance measures to meet the WLAs during wet weather conditions. The SEDs contemplate that certain best management practices (BMPs) will be employed to meet the WLAs, but do not specifically mention BMPs that could be used to achieve compliance during wet weather. If it is simply assumed that dry weather BMPs will be scaled up to accommodate wet weather flows, the SEDs do not adequately consider the environmental impacts associated with construction and operation of the infrastructure needed to handle the massive volumes of runoff present during wet weather, such as expanded treatment capacity for urban runoff and large storage tanks to minimize peak flows.

Furthermore, many of the BMPs mentioned as compliance options for the TMDL will either be ineffective or cannot be employed during wet weather. With respect to the Sanitation District's collection system, diversions of dry weather urban runoff would only be allowed if excess capacity is available, a connection fee has been permitted and paid for, and it has been determined that no constituents are present that may cause an exceedance of any existing or proposed wastewater treatment plant discharge limitation. Diversion of urban runoff is strictly prohibited during wet weather conditions to safeguard against sanitary sewer overflows, and to ensure that treatment plant capacity is not exceeded. Because diversions to wastewater treatment plants are not allowed during wet weather, the SEDs should be corrected to remove any references to such diversions. For example, Page 50 of the SEDs discusses the Regional BMP of "Divert and or Treat" and states:

"A change in fresh water movement may occur if compliance with the TMDL is achieved in part through diversion of storm water to wastewater or urban runoff treatment facilities. This is likely to have a positive effect during wet weather, as it will reduce the potential for flooding during storm events."

### **Beneficial Use Suspensions**

Contact recreation in the Santa Clara River (Water Contact Recreation or REC-1 beneficial use) is not legally allowed under certain low flow scenarios, in order to protect resident endangered species, or during dangerous high flow situations. The TMDL should not require measures to attain a beneficial use that would end up threatening endangered species or endangering the safety of the potential users. Because the TMDL is in itself a Basin Plan amendment, it is within the scope of TMDL to address these necessary beneficial use suspensions. The Sanitation District recommends that the Regional Board contact the Los Angeles and Ventura County Fire Departments and California Department of Fish and Game regarding conditions under which water contact recreation is suspended by each agency, and include beneficial use suspensions in the TMDL that accurately reflect these agencies restrictions.

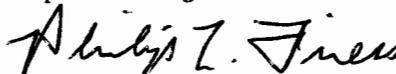
### **Wildfire Incorporation**

The Sanitation District recommends that the Regional Board determine the reason that watersheds that have experienced wildfires in the previous three years were excluded from the reference system used to develop the TMDL. Wildfires are naturally occurring events in the Santa Clara River Watershed and cannot be controlled by the TMDL regulated community. If the impact of wildfires on water quality is significant enough to exclude entire areas as reference systems, then the TMDL should incorporate specific exclusions for wildfires when they occur or have occurred recently within the watershed.

In addition to these specific comments, the Sanitation District would like to support the comments made in the City of Santa Clarita's comment letter regarding this TMDL. If you have any questions or require additional information about the comments contained herein, please contact Francisco Guerrero of my staff at (562) 908-4288, extension 2832, or fguerrero@lacsdsd.org.

Very truly yours,

Stephen R. Maguin



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