



MARK PESTRELLA, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

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IN REPLY PLEASE

REFER TO FILE: 7

May 18, 2017

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

Attention Cris Morris

Dear Mr. Unger:

### **COMMENT LETTER - TIME SCHEDULE ORDER FOR TAPIA WATER RECLAMATION FACILITY**

The County of Los Angeles and the Los Angeles County Flood Control District appreciate the opportunity to provide comments on the proposed Time Schedule Order (TSO) for Las Virgenes Municipal Water District's (LVMWD) Tapia Water Reclamation Facility (WRF). The County and the District have concerns regarding a lower chloride limit being established for Tapia's discharge.

The proposed chloride limit for Tapia WRF may have an impact on the opportunity for collaboration between LVMWD and local stormwater agencies, in addressing dry weather urban runoff flows in Malibu Creek Watershed, which potentially contain varying amounts of chloride, some of which originates from natural geologic sources. Diversion of flows from storm drains to WRFs for treatment is commonly used in our region and shown to be effective for preventing dry weather flows from reaching receiving waters. This approach is currently being pursued in Malibu Creek Watershed as one of the viable ways to address dry weather flows. To this end, the County, District, and City of Agoura Hills have approached LVMWD to evaluate the possibility of diverting dry weather flows from certain storm drains into Tapia WRF. LVMWD responded by adopting a policy in January 2017 that allows this opportunity. However, the lower chloride limit imposed on Tapia WRF for discharges to the tributary of the Los Angeles River during the dry season has created significant uncertainty for LVMWD, which in turn delays the opportunity for dry weather runoff diversion to Tapia WRF.

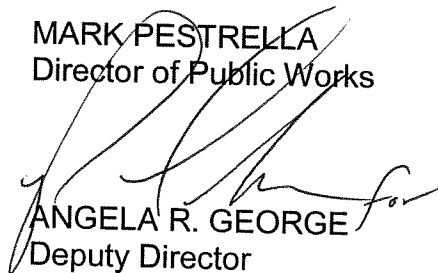
Mr. Samuel Unger  
May 18, 2017  
Page 2

The County and LACFCD understand that the Los Angeles River below the Sepulveda Flood Control Basin has a chloride limit of 190 mg/L, which is being used as a compliance target for other WRFs discharging to the lower reaches of the Los Angeles River. The County and District support the use of 190 mg/L limit as an interim target for Tapia WRF until an appropriate site-specific objective is determined for the Tapia discharge site. We also support the possibility of a future Basin Plan Amendment to extend the existing 190 mg/L chloride target for the lower Los Angeles River reaches to the Tapia discharges.

If you have any questions, please contact Mr. Paul Alva at (626) 458-4325 or [palva@dpw.lacounty.gov](mailto:palva@dpw.lacounty.gov) or your staff may contact Mr. Bruce Hamamoto at (626) 458-5918 or [bhamamo@dpw.lacounty.gov](mailto:bhamamo@dpw.lacounty.gov).

Very truly yours,

MARK PESTRELLA  
Director of Public Works

  
ANGELA R. GEORGE  
Deputy Director

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