



City of
SANTA CLARITA

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May 20, 2016

Mr. Eric Wu
Chief of Groundwater Permitting Unit
Regional Water Quality Control Board, Los Angeles Region
320 West 4th Street
Suite 200
Los Angeles, CA 90013

Dear Mr. Wu:

Subject: Tentative Waste Discharge Requirements (WDRs) / Water Reclamation Requirements (WRRs) for Vista Canyon Water Factory – City of Santa Clarita (File No. 14-031, Order No. R4-2016-XXXX, CI-10041, Global ID WDR100016910)

This letter serves as a joint response on behalf of the City of Santa Clarita (“City”) and Vista Canyon Ranch, LLC (“Vista”), the project developer, on the above referenced draft permit. We would like to thank Regional Board staff for working with us on this critical recycled water project since 2009. We very much appreciate the time and effort put forth by staff throughout this process.

We anticipate the Vista Canyon Water Factory to be operational by October 2017. When complete, the Water Factory will be owned and operated by the City of Santa Clarita and will provide recycled water to the Vista Canyon community and potentially in the future surrounding existing neighborhoods. This will be the first use of recycled water in the eastern Santa Clarita Valley.

For background purposes, Vista Canyon is a transit-oriented community, surrounded on all sides by existing residential and commercial development. Vista Canyon will include a new multi-modal City of Santa Clarita transit station (including a Metrolink Station and Bus Transfer Station), up to 950,000 square feet of commercial floor area (generating up to 4,000 permanent jobs), and 1,100 residential units all within walking distance of each other, and the transit station.

Although the City and Vista support the tentative permit, we offer the following minor clarifications for consideration.

- 6-2 • **Page 4, Section D. Subsection A.** The permit indicates “Santa Clarita Water District is the primary water district which supplies potable water to communities in the Santa Clarita Valley.” This provision should be corrected to reflect that Santa Clarita Water Division is one of four water retailers (Santa Clarita Water Division, Newhall County



6-2 [Water District, Valencia Water Company, and Los Angeles County Waterworks District No. 36) that provide potable water to communities in the Santa Clarita Valley. Santa Clarita Water Division does supply potable water to the Vista Canyon project site.

6-3 [• **Page 13, Part I.** The permit indicates “all influent waste shall be limited to domestic wastewater only from the Vista Canyon Project.....” This statement is inaccurate. As indicated in the report of waste discharge permit application in addition to the engineering report for the project, the Water Factory will treat a portion of the existing flows from a City of Santa Clarita sewer line crossing the project site. We would request that this provision be modified to correctly include the treatment of a portion of existing flows.

6-4 [• **Page 17, No. 3.** This provision requires “that the City shall monitor the groundwater for a minimum of two years prior to operation of the Water Factory to understand the groundwater quality in the shallow and deep aquifer before any discharge and/or recycled water application.” This provision conflicts with Page 1, No. 3 of the Permit, which indicates correctly that the Water Factory will be completed and begin operation in October 2017. We believe this conflict is an error in the tentative permit, as the engineering report for the Vista Canyon Water Factory included detailed groundwater data from existing water wells located on the project site and in close proximity to the project site. The permit should be clarified to indicate expected operation of the Water Factory will be October 2017. By that time, there will be approximately one year of additional groundwater data provided by both the existing water wells as well as the monitoring wells installed as part of this permit.

6-5 [• **Page T-9, Table 4.** The latitude/longitude locations listed in this table are not correct. We would request the table be updated to reflect the proper locations of the monitoring wells.

Thank you for your consideration of the above comments. If you have any questions regarding this letter, please feel free to contact either Robert Newman at the City of Santa Clarita at (661) 284-1429 or via email at rnewman@santa-clarita.com or Glenn Adamick at Vista Canyon Ranch, LLC, at (661) 755-7113 or via email at GAdamick@jsbdev.com.

Sincerely,



Robert Newman
Director of Public Works
City of Santa Clarita



Glenn Adamick
Partner
Vista Canyon Ranch, LLC