

Response to Comments

Revised Tentative Waste Discharge Requirements (WDRs) and Water Recycling requirements (WRRs) for
City of Santa Clarita
Vista Canyon Water Factory (Water Factory)

Comment Letter	Commented by	Date
1	Mr. Steve Knight, Member of Congress, Congress of the United States	May 23, 2016
2	Mr. Scott Wilk, Assembly California Legislature	May 20, 2016
3	Santa Clarita Water District and Castaic Lake Water Agency	May 19, 2016
4	Santa Clarita Valley Chamber of Commerce	May 20, 2016
5	Santa Clarita Valley Economic Development Corporation	May 23, 2016
6	City of Santa Clarita and Vista Canyon Ranch, LLC	May 20, 2016
7	Sierra Club	May 23, 2016

No.	Comment	Response to Comment
Mr. Steve Knight, Member of Congress, Congress of the United States		
1-1	Mr. Steve Knight, Congressman, Congress of the United States, expresses his support of the WDRs/WRRs for Water Factory project of the City of Santa Clarita.	Comment noted.
Mr. Scott Wilk, California Assembly Member		
2-1	Mr. Scott Wilk, Assemblyman, the 38 th District of Assembly California Legislature expresses the strong support of the Water Factory project and looks forward to the approval of the WDRs/WRRs permit for the Water Factory project.	Comment noted.
Santa Clarita Water District and Castaic Lake Water Agency		

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3-1	The SCWD and the CLWA express strong support of the WDRs/WRRs for Water Factory project of the City of Santa Clarita.	Comment noted.
Santa Clarita Valley Chamber of Commerce		
4-1	The Santa Clarita Valley Chamber of Commerce strongly supports the issuance of the WDRs/WRRs for Water Factory project to the City of Santa Clarita.	Comment noted.
Santa Clarita Valley Economic Development Corporation		
5-1	The Santa Clarita Valley Economic Development Corporation strongly supports the issuance of the WDRs/WRRs for Water Factory project to the City of Santa Clarita.	Comment noted.
City of Santa Clarita and Vista Canyon Ranch, LLC		
6-1	The City of Santa Clarita and the Vista Canyon Ranch, LLC support the tentative permit and offer minor clarifications for the Board consideration.	Comment noted.
6-2	<p>Page 4, Section D. Subsection A.</p> <p>The statement “The Santa Clarita Water District (SCWD) is the primary water district which supplies potable water to communities in the Santa Clarita Valley,” shall be corrected to reflect that Santa Clarita Water Division is one of four water retailers (Santa Clarita Water Division, Newhall County Water District, Valencia Water Company, and Los Angeles County Waterworks District No. 36). These four water retailers provide potable water to communities in the Santa Clarita Valley.</p>	<p>Regional Board staff agree. Finding No. 15.D.a. has been revised as the follows:</p> <p>“The Santa Clarita Water Division (SCWD) is the primary water district which supplies potable water to the Vista Canyon and is one of four water retailers (Santa Clarita Water Division, Newhall County Water District, Valencia Water Company, and Los Angeles County Waterworks District No. 36) supplying potable water to communities in the Santa Clarita Valley. ...”</p>
6-3	<p>Page 13, Part I.</p> <p>The statement “Influent waste shall be limited to domestic wastewater only from the Vista Canyon Project and shall not exceed its design capacity of 392,000GPD.” is inaccurate. The Water Factory will also treat a portion of the existing flows from the City of Santa Clarita sewer line crossing the project site.</p>	<p>Regional Board staff agree. Section I, Influent Limits and Requirements, has been revised as follows:</p> <p>Influent waste shall be limited to domestic wastewater only from the Vista Canyon Project and a portion of existing domestic flows from the City and shall not exceed its design capacity of 392,000GPD.</p>
6-4	<p>Page 17, No. 3.</p> <p>The statement “The City shall monitor 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.” conflicts with Page 1, No.3 of the</p>	<p>Regional Board staff agree. The language is correct and has been further revised to clarify as follows:</p> <p>“The City shall monitor groundwater for a minimum of two years, once in 2016 and once in 2017, prior to operation of the Water Factory to understand the groundwater quality in</p>

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	permit, which indicates correctly that the Water Factory will be completed and begin operation in 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.	the shallow and deep aquifer before any discharge and/or recycled water application.”
6-5	Page T-9 Table 4 The latitude and longitude locations listed in Table 4 are not correct.	Regional Board staff agree. The correct coordinates have been updated in Table 4.
Sierra Club		
7-1	We object to a sanitation plant being called a “water factory”. Neither the project nor this sanitation plant will “create or make” water as the project proponent implies by the use of the word “factory” We believe this terminology is confusing and misleading to the public and ask that the term “sanitation plant” replace “water factory” wherever the later term appears.	The City of Santa Clarita is responsible for naming the treatment plant. The Regional Board does not have the authority to require the City of Santa Clarita to change the name of the project.
7-2	Introduction-Item 4 This paragraph of Finding No. 4 incorrectly describes how the recycled water will be distributed. In fact, although the City of Santa Clarita will own and operate the sanitation plant and is responsible for ensuring that all water quality standards are met, the City will not be distributing the recycled water. All recycled water will be distributed by the Castaic Lake Water Agency (CLWA) through its pipes only to areas controlled by its Santa Clarita Water Division. We have attached the Agreement signed with CLWA as Exhibit 1.	The Santa Clarita Water Factory is owned and will be operated by the City of Santa Clarita. The City of Santa Clarita is solely responsible for the operation, maintenance and efficiency of the Water Factory and the application of the recycled water. It is appropriate and adequate to define the City of Santa Clarita as the Discharger, though the treated wastewater for recycled water use and its distribution may be managed by the CLWA. The Discharger remains responsible for compliance with the terms of the WDRs/WRRs. The Regional Board imposes effluent and groundwater limitations to protect the groundwater and surface water quality and the designated beneficial uses. The Regional Board does not have the authority to designate the agency responsible for the recycled water distribution.
7-3	We wish to raise a concern at this time that as stated above, the excess water will only be distributed to the retail company, Santa Clarita Water Co. owned by Castaic Lake Water Agency. This distribution scheme is apparent in the recently released Notice of Preparation for its recycled water plan were it states: “Phase 2B would involve a partnership between CLWA, Santa Clarita Water Division (SCWD), and the Vista Canyon development to utilize recycled water produced from the Vista Canyon Water Factory (VCWF), which is proposed as part of the	The tentative WDRs/WRRs only allow the treated wastewater to be recycled for (1) the Vista Canyon Project on-site uses for landscape irrigation and public restrooms in commercial areas and (2) off-site uses for landscape irrigation and other Title 22 non-potable recycled water applications approved by the State Water Resources Control Board’s Division of Drinking Water. The City of Santa Clarita may seek authority under the State Water Resources Control Board’s Recycled Water WRRs Order No. 2009-0006-DWQ to apply recycled water for use beyond the current scope defined in these

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	<p>Vista Canyon land development and is expected to be in service at the time the development is completed.”</p> <p>We believe that this distribution plan does not fairly distribute water in the Eastern end of the basin, but rather, favors distribution only to the company that is owned by CLWA.</p>	<p>WDRs/WRRs. Your concern regarding the distribution plan should be discussed with the Discharger. The Regional Board does not have the legal authority to designate which agency the City of Santa Clarita retains for the recycled water distribution.</p>
7-4	<p>Item 15C. Water Factory</p> <p>“The Sludge (21,000 GPD) generated from the Water Factory, the remaining un-recycled treated effluent, and any off-spec effluent generated from the Vista Canyon Project will be discharged to the downstream facilities of the SCVSD, including the Saugus Water Reclamation Plant (WRP) or/and the Valencia WRP. The Saugus WRP will be the primary plant to treat solids. The Valencia WRP is the backup plant to treat the extra solids generated beyond the solid treatment capacity of the Saugus WRP.”</p> <p>It is our understanding that the Saugus treatment plant is at full capacity and all sewage has been transported to the Valencia Water Treatment plant many miles further on via a gravity feed pipeline. Therefore all water quality standards must meet the Valencia Water Reclamation Plant requirements.</p>	<p>The Saugus and Valencia Water Reclamation Plants (WRPs) have design capacities of 6.1 and 21.1 million gallons per day (MGD), respectively. The monthly average effluent discharged from the Saugus WRP and the Valencia WRP between November 2010 and May 2016, ranged from 4.8 to 5.7 MGD (averaged 5.1 MGD) and 12.4 to 15.1 MGD (averaged 13.9 MGD), respectively. The Water Factory has a design capacity of 0.39 MGD, including 0.37 MGD of effluent to be recycled and 0.02 MGD of sludge. Each WRP has sufficient capacity to accommodate the sludge and untreated wastewater discharged from the Santa Clarita Water Factory.</p> <p>Additionally, the Saugus and Valencia plants are independently responsible for maintaining compliance at their facilities.</p> <p>Regional Board staff have revised proposed Finding No. 15.C as follows:</p> <p>“...The sludge (21,000 GPD), any excess treated effluent not being recycled from the Water Factory, and any untreated wastewater generated from the Vista Canyon Project will be discharged to the downstream facilities of the SCVSD, including the Saugus Water Reclamation Plant (WRP) or/and the Valencia WRP. Any effluent not meeting effluent limitations will be delivered to the headworks for further treatment.”</p> <p>The WDRs/WRRs regulate the discharge to land via land irrigation. Requirements for land disposal are different from the surface water discharge requirements for the Valencia WRP. The prescribed effluent and groundwater limitations are protective of the surface water quality of the Santa Clarita River nearby and the groundwater quality beneath the project</p>

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		site. The revised language, however, allows the Discharger to send the solids and untreated wastewater to either the Saugus WRP or the Valencia WRP.
7-5	<p>We also wish to express our concern that removal of the recycled water may cause improper function of the gravity feed system and a resulting failure to properly transport solids. We understand that the City of Los Angeles has experienced such problems as it continues to encourage water conservation and reduced flow toilets. We ask that the Regional Board consult with the Los Angeles County Sanitation Districts to validate which plant will in fact accommodate the additional sewage and what plans have been made to transport the solids.</p> <p>Sewage releases into the Santa Clara River, the source of much of the Valley's drinking water supply are not acceptable. Problems should be anticipated and contingencies developed BEFORE a foreseeable potential emergency occurs.</p>	<p>The City of Santa Clarita shall ensure the proper design to avoid the problem as described in your comment.</p> <p>The tentative WDRs/WRRs address the potential impacts of climate change (Finding No. 18) and will require the City of Santa Clarita to construct the retaining wall in conformance with the County of Los Angeles Capital-Flood requirement, which exceed a 1,000-year storm event. In addition, the City of Santa Clarita is required to submit a Climate Change Effects Vulnerability Assessment and Management Plan for the foreseeable emergencies specified in Section VII.2 of the tentative WDRs/WRRs permit.</p>
7-6	<p>D. Influent Quality</p> <p>The statement of "The Santa Clarita Water District (SCWD) is the primary water district which supplies potable water to communities in the Santa Clarita Valley, including the vista Canyon Project." shall be corrected to reflect that Santa Clarita Water Division is one of four water retailers in the Santa Clarita Valley.</p>	Regional board staff agree. See the revised language specified in Response to Comments No. 6-2.
7-7	<p>Effluent Water Quality</p> <p>The influent water quality seems to be accurately described in the previous chart (Table 1), but for some reason the effluent water quality chart (Table 2) indicates that the chloride levels will not change from the indicted influent level of 112 mg/L. It is our understanding that standard household use adds approximately 50mg/l of chlorides due to soap, detergents, and urine. Restaurant uses may add additional amounts. We do not see where these increases due to household use are added into your calculations.</p>	<p>The amount of chloride added by residential and commercial waste streams within the area was evaluated in the <i>2008 Chloride Source Identification/Reduction, Pollution Prevention, and Public Outreach Plan</i>, Sanitation Districts of Los Angeles County, dated November 2008.</p> <p>That document concluded that chloride generated from residential and commercial waste streams, that will be added to the source water is 31 mg/L. The additional 31 mg/L of chloride is included in Column 5 of Table 1 and its Note 5.</p> <p>In addition, the Water Factory is not designed to treat/remove chloride in the wastewater. Therefore, the influent and effluent chloride concentrations will be the same. The WDRs/WRRs establish a monthly average chloride effluent limitation concentration at 112mg/L.</p>
7-8	We note again that to our knowledge, the Saugus treatment plant is fully	See Response to Comment No. 7-4.

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	<p>utilized.</p> <p>We therefore believe that water quality for this plant must meet the VWR plant standards since that is where it may be released.</p>	
7-9	<p>Effluent Storage Equalization Tank</p> <p>“a. A 200,000-gallon effluent storage equalization tank (Figure 5) will be constructed adjacent to the Water Factory and along the Santa Clara River bank in order store the as following. Water in excess of this capacity will be sent downstream to either the Saugus or Valencia reclamation facilities.”</p> <p>We restate again that to our knowledge, the Saugus treatment plant is fully utilized. We therefore believe that water quality for this plant must meet the VWR plant standards since that is where it may be released.</p>	See Response to Comment No. 7-4.
7-10	<p>Facility to be built in the floodplain of the Santa Clara River</p> <p>While the City has required a retaining wall to be built, it still appears that the sanitation plant will be built dangerously close to the floodway of the Santa Clara River. We do not understand why this location is being permitted.</p>	<p>The Regional Board’s authority and responsibility is to regulate discharges of waste that could impact the waters of the State. The Regional Board is not a land use planning agency and its actions to address water quality do not constitute approval of any development. It is the responsibility of the land use planning agency, in this case, the City of Santa Clarita, to approve the development project. The Regional Board previously issued a Clean Water Act section 401 certification of a Clean Water Act section 404 permit issued by the United States Army Corps of Engineers, that addressed impacts of dredge and fill activities on waters of the state.</p> <p>Also see Response to Comment No. 7-5.</p>
7-11	<p>Requirements</p> <p>3. “The City shall monitor 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.”</p> <p>4.“The City shall demonstrate that the discharge and recycled water use from the Water Factory do not contribute to the degradation of</p>	Requirement 3 has been revised. See Response to Comment No. 6-4.

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	<p>groundwater quality by meeting all groundwater quality limits specified in Table 9. In the event that the groundwater quality exceeds the limits specified in Table 9, the discharger shall demonstrate that the discharge/recycled water use do not contribute to the groundwater quality exceedance.”</p> <p>We ask that these monitoring reports be retained on file at the Los Angeles Regional Water Quality Control Board and be made available to the public upon receipt when notification is requested.</p>	<p>All submitted monitoring reports of the Vista Canyon Water Factory project will be uploaded and posted on the Regional Board’s GeoTracker database which is accessible by the public.</p>