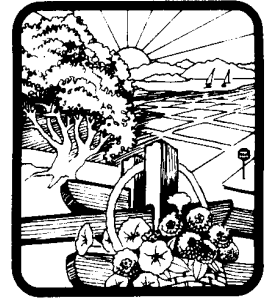


**SCOPE**  
**Santa Clarita Organization for Planning and the Environment**  
TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY  
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY  
POST OFFICE BOX 1182, SANTA CLARITA, CA 91386  
[www.scope.org](http://www.scope.org)



5-4-19

Honorable Board Members  
Renee Prudy, Executive Director  
Veronica Cuevas, Staff  
Jeong-Hee Lim, Ph.D., P.E., Chief of the Municipal Permitting (POTW) Los Angeles  
California Regional Water Quality Control Board – Los Angeles Region  
320 W. 4<sup>th</sup> St. Suite 200  
Los Angeles, CA 90013

*Via email to: [veronica.cuevas@waterboards.ca.gov](mailto:veronica.cuevas@waterboards.ca.gov), [jeong-hee.lim@waterboards.ca.gov](mailto:jeong-hee.lim@waterboards.ca.gov)*

**Re: Comments on the Tentative Waste Discharge Requirements (WDRs) and  
National Pollutant Discharge Elimination System Permit (NPDES) – Newhall  
Ranch Water Reclamation Plant (NPDES Permit No. CA0064556)**

SCOPE has been an active participant in the WDR permit process for Santa Clarita Valley Sanitations plants over the last two decades.

**Background**

The Santa Clara River is the last unchannelized, mostly wild river in Los Angeles County. It is home to many endangered species and contains some of the last rare plants and native riparian habitat in the County. Since effluent from the existing treatment facilities in the Santa Clarita City area (the Saugus Treatment Facility and the Valencia Treatment Facility) are currently out of compliance with water quality standards and may be causing harm to downstream economic and biological resources, we appreciate the opportunity to comment on this permit. It is our hope that sufficient and rigorous conditions will be included in this permit to eliminate recurrence of the upstream water quality issues in the new WDR.

**Timing of Permit Issuance**

Although we understand that the NPDES permit is not legally linked to other land use approvals, the reality is that this Sanitation District Facility will not be built without a land use that produces effluent. Since Newhall will send the effluent for its first two tracts, Mission and Landmark, to the existing Valencia Treatment Plant as described in your notice, we appreciate your efforts in this permit to ensure that new pollutant action levels or other changes, including Emerging Contaminants of Concern (especially, PFAS), must be addressed and the permit revised to incorporate new data and new conditions.

**Chloride and other limits**

As the RWQCB is very aware, many reaches of the Santa Clara River are on the 303d list for exceedances of chlorides, ammonia and bacteria. Generally, these exceedances are a result of effluent from the two upstream Sanitation District plants' outfalls. Any additional contaminants

from a new plant would therefore have an increased cumulative impact to basins that are already impaired by these exceedances. Therefore we appreciate the permit's strong conditions and regulatory enforcement mechanisms such as daily fines that will guard against any further exceedances as described.

This is especially important because much of the project may rely on imported water that is higher in salts than the local ground water. Additionally, testing from local ground water wells that are supposedly going to be used for the first phases of the project (i.e. Well E15) indicates higher Chloride and TDS levels than ground water found elsewhere in the Santa Clarita Valley (charts are available in the Newhall Ranch and Sanitation Plant EIR and will be submitted upon request).

### **Disposal of Brine from reverse osmosis operations**

The Notice and tentative WDR state that

*The brine from the RO process will be disposed of using one of two methods: trucking it to the Joint Water Pollution Control Plant for disposal to the ocean or injecting it through a deep well (authorized under Permit No. R9UIC-CA 1-FY11-4, a separate permit from USEPA for Class I Non-hazardous waste injection wells, which expires November 13, 2023). Newhall Ranch SD plans on recycling the majority of its treated effluent from the Newhall Ranch WRP for irrigation purposes under separate water recycling requirements.*

It should be noted that the recent Engineering Report for this POTW, adopted by the Los Angeles County Board of Supervisors on March 26<sup>th</sup>, stated that deep well injection would not be used for this facility. We urge you to ensure that the WDR conforms with this Engineering Report. We believe this change was due to the public uproar over the Sanitation District's attempt to use deep well injection in a seismically active area. The four wells proposed in the Well Injection permit would also be sited in a seismically active area. We will be glad to provide additional documentation regarding this issue to the Board upon request.

### **Temperature**

We support the lower temperature in this permit as it is more supportive of downstream beneficial uses (particularly fish habitat). We believe that this limit will be more protective of the fish and amphibian species, including the Unarmored Three-spine stickleback fish, a listed endangered species and California Species of Special Concern that exist in the Santa Clara River in these reaches. However, there seems to be a discrepancy between the table on page 9 (86degrees) and the revised text on page 16 (80 degrees).

### **Recycled Water**

This permit puts off the issue of reuse of the water, saying it will be addressed in another order. We object to the deferring of this issue, because once the permit allows discharge of 100%, the Newhall Sanitation District could abandon their plans to reuse the water with no consequence, in spite of the adequacy of the water supply depending on a maximum use of recycled water.

Further, the Tentative WDR states on Page 8

*In times when the demand for recycled water exceeds what the Newhall Ranch WRP can provide, water from the Santa Clarita Valley Water Agency will be used to supplement the recycled water supply so that the recycled water customers do not experience a shortage in service.*

This statement does not conform to statements made in the water sections of the Specific Plan EIR or the EIRs for the two approved tract maps.

We concur with and join in the comments submitted to this Board by the Friends of the Santa Clara River.

We request notification of all hearings, permit change applications or other notifications of any kind or other public documents that become available regarding this NPDES permit and Order.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynne Plambeck". The signature is written in a cursive, flowing style.

Lynne Plambeck  
President