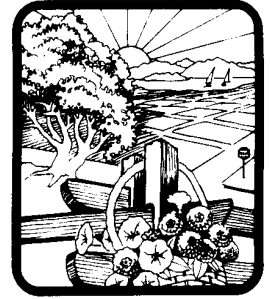


## SCOPE

### 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



4-10-19

Veronica Cuevas

Los Angeles Regional Water Quality Board

320 W. 4<sup>th</sup> St. #200

Los Angeles, CA 90013

*Delivered via email to Veronica.Cuevas@waterboards.ca.gov*

*Please copy to all Board Members*

Re: Comments on TSO's for Saugus Water Treatment Plant (NPDES PERMIT NO. CA0054313) and Valencia Water Treatment Plant (NPDES PERMIT NO. CA0054216)

Santa Clarita Organization for Planning and the Environment (SCOPE) is a California non-profit corporation focused on the Santa Clarita Valley and the watershed of the Santa Clara River. Founded in 1987, we are now in our 31st year of volunteer work for the environment in the Santa Clarita Valley. We have worked on the chloride issue in the Santa Clara River since the river was first placed on the 303d list in the late 1990s. Our participation included attending multiple hearings and participating in various working groups to ensure that in stream water quality is protective of habitat, endangered species, agricultural and municipal uses.

We note that the baseline chloride level of the Santa Clara River is 100 mg/l. After an extensive non-degradation process in 2008, a level of 117 mg/l was found to be protective of downstream agricultural resources. The TSO states that 230 mg/l is protective of fish and other amphibians. We would like to assert here that we believe that level is overstated and inaccurate. No evaluation of an increase in the chloride level that amounts to over 100% of baseline levels was ever conducted on the effects to the reproductive cycles of the many downstream endangered or threatened amphibians and fish. We did not pursue the effects to the reproductive cycle further because of lack of funding and because we felt that the agricultural limit of 117 mg/l would hopefully be sufficient to address species protection.

We are discouraged that after two decades of trying to address this problem, the Sanitation District has still not met the effluent limits required by the Clean Water Act and by your Board. While we understand that the court orders resulting from the EIR litigation may not be subverted by your Board, we also have observed that the Sanitation District has sometimes appeared not to proceed in good faith. For instance, instead of working with the community to resolve obvious problems surrounding their earlier proposals, the community was forced to litigate to ensure that their homes were protected and conservation easements honored.

Now, they want yet another extension. This continued delay is unacceptable.

We request that your Board 1) shorten that extension to two years for the Valencia Plant, since the contract for the AWTF has already been awarded<sup>1</sup>; and 2) to one year for the Saugus Plant, since the Saugus plant is only going to add UV treatment to reduce the need to chlorinate.

We further encourage you to create interim measures for failure to meet the any TSO that you may establish.

### **Abandonment of the Recycled Water Project**

The Tentative Order for the Valencia plant stated that:

*The SCVSD Board of Directors approved a resolution to cease environmental studies related to the Recycled Water Project. Future recycled water planning is anticipated to be led by the recently formed Santa Clarita Valley Water Agency, which delivers all recycled water and nearly all drinking water in the Valley. SCVSD will continue to produce high-quality reclaimed water and will assist the Santa Clarita Valley Water Agency in its efforts for future recycled water projects.*

We do not understand how the agency that would produce, contract for, and be responsible for any required mitigation for recycled water issuing from its facility, could be relieved of the duty to provide an EIR for those actions. Your Board should further be aware that this concept has not appeared on any Santa Clarita Valley Water Agency agenda, nor is it incorporated in their budget or other water planning documents. This resolution is, in our opinion, just one more example of an agency that would use means, that they are fully aware would not be legally acceptable, as a way to avoid conducting required environmental review. Since the recycled water project was originally part of the environmental review for this proposal, it is unclear whether the court will allow its abandonment, since it did *not* previously do so.

### **Conclusion**

Thank you for your time and attention to our concerns.

Sincerely,



Lynne Plambeck  
President

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<sup>1</sup> **Santa Clarita Sanitation District Awards Advanced Water Treatment Facility Contract**  
Posted by: [Michael Brown](#) in News, February 1, 2019 - 11:36 am “The Board of Directors for the Santa Clarita Valley Sanitation District of Los Angeles County (SCV Sanitation District) awarded an \$87 million contract to OHL USA, Inc. for construction of an advanced water treatment facility.”  
<https://www.hometownstation.com/santa-clarita-latest-news/santa-clarita-sanitation-district-awards-advanced-water-treatment-facility-contract-264935>