



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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Chief Engineer and General Manager



November 17, 2014  
File No. 32-11.01-55

Ms. Felicia Marcus, Chair, and Members  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814  
ATTN: Jeanine Townsend, Clerk to the Board

Dear Chair Marcus and Board Members:

## **Support Letter – Upper Santa Clara River Chloride TMDL Revision**

The Santa Clarita Valley Sanitation District of Los Angeles County (District) strongly supports the approval of amendments to the Water Quality Control Plan for the Los Angeles Region (Basin Plan) to revise the Upper Santa Clara River Chloride Total Maximum Daily Load (TMDL) and to revise water quality objectives for chloride in the Upper Santa Clara River. The District believes that the Basin Plan Amendment will benefit the community and local businesses of Santa Clarita, while fully protecting water quality and the designated beneficial uses of the Santa Clara River, including salt sensitive agriculture in Reach 4(b). The District provides wastewater treatment services to the City of Santa Clarita and unincorporated areas of Los Angeles County in the Santa Clarita Valley. The District owns and operates the Valencia and Saugus Water Reclamation Plants (WRPs), which provide tertiary treatment to produce high quality recycled water that is reused or discharged to the Upper Santa Clara River.

The District and other stakeholders in the Santa Clarita Valley are greatly encouraged by the recent progress made towards implementation of the Upper Santa Clara River Chloride TMDL. The Upper Santa Clara River Chloride TMDL was first adopted in 2002, and then later revised in 2004, 2006, and 2008. Since then, the District has taken many important steps towards the development of a compliance solution, which are briefly summarized here. In January 2009, the Measure S ordinance, after receiving an overwhelming vote in support by the community in November 2008, took effect. Measure S required the removal and disposal of all existing automatic water softeners installed in the District's service area. As of August 31, 2014, over 8,100 automatic water softeners have been removed, resulting in a reduction in chloride loading of approximately 55 mg/L in the District's effluent. In October 2013, the District's Board of Directors certified its Chloride Compliance Facilities Plan and Environmental Impact Report and approved an advanced treatment-based chloride compliance project that includes installation of microfiltration and reverse osmosis treatment facilities for chloride removal at the Valencia WRP, as well as associated brine disposal facilities, and use of ultraviolet disinfection instead of chlorine-based disinfection, to avoid in-plant chloride loading at both the Valencia and Saugus WRPs. In July 2014, the District's Board of Directors adopted rate ordinances prescribing the service charge increases necessary to fund the chloride compliance project at a projected cost of approximately \$130 million. Most recently, the District has been working closely with staff at the Los Angeles Regional Water Quality Control Board on this Basin Plan Amendment and revisions to the Upper Santa Clara River Chloride TMDL, which was approved unanimously by the Regional Board on October 9, 2014. The District's Engineering Design staff also has begun design of the chloride compliance project facilities described above.

The District strongly urges the State Water Resources Control Board to approve the Basin Plan Amendment and revisions to the Upper Santa Clara River Chloride TMDL. Approval of the Basin Plan Amendment would allow the District to implement a smaller, modestly less costly compliance project with reduced construction impacts, in large part due to the avoided construction of the reverse osmosis permeate pipeline from Valencia WRP to Saugus WRP, which will reduce electricity consumption and greenhouse gas emissions. Furthermore, the extension of the compliance schedule and interim waste load allocations to July 1, 2019 are critically important to allow the District sufficient time to complete design, construction and startup of the chloride compliance project. The District appreciates this opportunity to provide support and would like to thank you for your consideration.

Very truly yours,



Grace Robinson Hyde

PLF:MB:djm

cc: Sam Unger, Los Angeles Regional Water Quality Control Board  
Jenny Newman, Los Angeles Regional Water Quality Control Board