



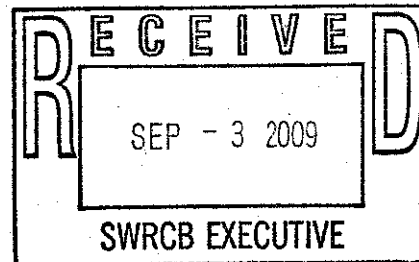
COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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STEPHEN R. MAGUIN
Chief Engineer and General Manager

September 3, 2009
File No. 31-370.40.4D

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



Dear Ms. Townsend:

Comment Letter - Upper Santa Clara River Chloride SSOs and TMDL Revision

The Santa Clarita Valley Sanitation District of Los Angeles County (Sanitation District) would like to thank the State Water Resources Control Board (State Board) for this opportunity to provide comments on the Los Angeles Regional Water Quality Control Board (Regional Board) Resolution No. R4-2008-012, which amends the Water Quality Control Plan for the Los Angeles Region (Basin Plan) by revising the Upper Santa Clara River Chloride Total Maximum Daily Load (TMDL) and incorporating conditional Site Specific Objectives (SSOs). The Sanitation District provides wastewater treatment services to the City of Santa Clarita and unincorporated areas of Los Angeles County in the Santa Clarita Valley. The Sanitation District owns and operates the Valencia and Saugus Water Reclamation Plants, which provide primary, secondary and tertiary treatment to produce recycled water that is reused or discharged to the Upper Santa Clara River.

The Sanitation District is currently working with the Regional Board to consider modifications to Resolution No. R4-2008-012 because of the fiscal impact the TMDL has on the residents of the Santa Clarita Valley. While the TMDL in its current form would facilitate the implementation of a lower cost alternative compliance scheme to that required by the original TMDL, the cost to implement this plan is still over \$250 million, which would be the primary factor requiring a tripling of monthly service rates for ratepayers in the Santa Clarita Valley. Service rate increases of this magnitude, especially during these economic times, are just not tenable for the community to bear. Like many areas throughout the State, the Santa Clarita Valley has been severely affected by the recent economic downturn. The Sanitation District now more than ever has a fiduciary duty to our ratepayers to explore all opportunities to further reduce the cost of compliance with the State Mandate and lessen the impact of the cost of compliance with the TMDL on the community.

The Sanitation District is working with the Regional Board to investigate the following opportunities for additional regulatory relief: (1) relief during drought periods, when imported water supplies delivered by the State spike in chloride concentrations and adversely impact the quality of recycled water discharges to the river; and (2) schedule relief to extend the TMDL compliance timeframe and lessen the immediate financial impact to the community by allowing the Sanitation District time to

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Ms. Jeanine Townsend

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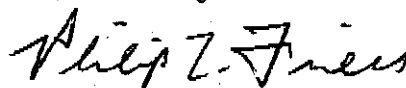
secure federal and state funding for project implementation. **The Sanitation District requests that the State Board delay the adoption hearing for Resolution No. R4-2008-012, so that further modifications to the TMDL can be explored to reduce the financial burden on our ratepayers, while still meeting the objectives of the TMDL to protect the beneficial uses of the Santa Clara River.**

Meanwhile, the Sanitation District remains committed to reducing chloride levels in the river and protecting the river's beneficial uses. We have made extensive progress in reducing chloride levels in the recycled water and the Santa Clara River through the removal of automatic water softeners. In 2003, the Board of Directors of the Sanitation District enacted a prospective ban on automatic water softeners, making the Sanitation District the first agency in the State to enact such an ordinance since longstanding bans in the Santa Clarita Valley and throughout the State were overturned by State Court decisions in 1997. Since 2005, the Sanitation District Board has implemented a nationally recognized and innovative voluntary rebate program to encourage residents to give up their automatic water softeners by reimbursing residents the reasonable value of their units, and paying the cost for removal and disposal of these units. To date, we are still providing these rebates to our residents. In 2008, the Sanitation District Board adopted the Santa Clara River Chloride Reduction Ordinance prohibiting the use of, and requiring the removal of, all remaining residential automatic water softeners in the Sanitation District's service area. This Ordinance became effective on January 1, 2009 after being approved through the passage of local Measure S in the November 4, 2008 General Election. The Sanitation District is the first and only agency in the State to have adopted such an ordinance. The cumulative result of all these efforts has been the removal of over 5,800 automatic water softeners from the Sanitation District's service area, with an additional 1,000 applications still being processed. More importantly, the removal of these automatic water softeners has dramatically reduced chloride levels in the recycled water and the Santa Clara River. In 2003, chloride levels in the recycled water were recorded near 190 mg/L (approximately 100 mg/L above water supply); recently, chloride levels have been recorded near 140 mg/L (approximately 60 mg/L above water supply). This improvement in water quality is directly attributable to these extensive and successful outreach efforts, as well as the commitment of the Santa Clarita Valley community to improve water quality and protect the Santa Clara River.

Again, the Sanitation District requests that the State Board delay the adoption hearing for Resolution No. R4-2008-012 in order to facilitate needed modifications to the TMDL to reduce the cost of compliance to our ratepayers. We appreciate your consideration of these comments. If you have any questions or require further information, please contact the undersigned at extension 2501.

Very truly yours,

Stephen R. Maguin



Philip L. Friess
Departmental Engineer
Technical Services Department

PLF:BL:dhs

cc: Tracy Egoscue, Executive Officer LARWQCB

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