

From: Mays, Denise <djmays@lacs.org>
Sent: Wednesday, July 30, 2014 10:30 AM
To: 'BDCP.comments@noaa.gov'
Subject: Letter - BDCP Comments July 2014
Attachments: DMS-#3047373-v4-Letter_-_BDCP_Comments_July_2014.PDF

Good morning,

Attached please find the Districts' comments on the *Draft Bay Delta Conservation Plan and Associated Draft Environmental Impact Report/Environmental Impact Statement*. There is one file attached in pdf format. Please let me know if the file does not transmit properly.

If you have any questions regarding the attached, please contact Phil Friess at pfriess@lacs.org or (562) 908-4288, extension 2501.

Thank you!

~Denise

Denise J. Mays, Administrative Secretary

County Sanitation Districts of Los Angeles County

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BDCPP150

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GRACE ROBINSON HYDE
Chief Engineer and General Manager

July 30, 2014
File No. 31-370-40.4A

VIA ELECTRONIC MAIL

BDCP Comments
Ryan Wulff, NMFS
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Sacramento, CA 95814

To Whom It May Concern:

Comments on the Draft Bay Delta Conservation Plan and Associated Draft Environmental Impact Report/ Environmental Impact Statement

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to review and comment on the Draft Bay Delta Conservation Plan (BDCP) and associated Draft Environmental Impact Report/ Environmental Impact Statement (EIR/EIS). The Sanitation Districts are a public agency consisting of 23 independent special districts that provide for the wastewater and solid waste management needs of about 5.5 million people in 78 cities and unincorporated areas within Los Angeles County. As part of that program, the Sanitation Districts operate ten water reclamation plants that currently produce approximately 174,000 acre-feet per year of recycled water, of which over 100,000 acre-feet per year is supplied to over 750 sites for a variety of uses, including landscape irrigation, agriculture, recreational impoundments, industrial processing, environmental enhancement, and groundwater recharge. Since the inception of its program in 1962, the Sanitation Districts have delivered nearly 2.8 million acre-feet of recycled water for beneficial reuse. Recycled water produced at the reclamation plants that is not reused for the purposes listed above is discharged to local surface waters that are usually effluent dominated.

The Sanitation Districts support the adoption of the Draft BDCP and associated Draft EIR/EIS and Conservation Measure 1(CM1) of the proposed project, which would implement a dual-conveyance system to serve the existing State Water Project (SWP) pumping plants. These efforts propose to secure and protect California's water supply by building intakes in the north Delta to avoid increased salinity from tidal effects and expected climate change effects.

The Sanitation Districts have a long history and have made a significant investment in the development of recycled water infrastructure and programs in Los Angeles County. We support the BDCP because the expected improvements in the water quality, and specifically reductions in the salinity of SWP water, would in turn improve water quality and reduce the salinity of the recycled water that the Sanitation Districts produce. Further, this would improve the Sanitation Districts' ability to comply with Waste Discharge and Water Recycling Requirements issued by the Los Angeles and Lahontan Regional Water Quality Control Boards for recycling and surface water discharges from their water reclamation plants. Many potential users of recycled water express concern that irrigating with water with a higher salt content than other sources would adversely impact their plantings. Lower salinity recycled water would also greatly improve the feasibility and cost of implementation measures local agencies must take in accordance with the State Water Resources Control Board's Recycled Water Policy requirements

associated with development of Salinity and Nutrient Management Plans. Reducing the regulatory burden on recycled water use and improving its quality would increase its use, thereby helping areas in Southern California that use SWP as a water supply develop local water supplies and reduce their dependence on water from the SWP. These efforts to develop local recycled water supplies also assist the State in attaining its goal to recycle at least two million acre-feet per year by 2030 (a goal that was adopted by the State Water Resources Control Board in the Recycled Water Policy).

One example of local salinity discharge and water recycling permit limits affecting two of the Sanitation Districts' water reclamation plants, the Saugus and Valencia Water Reclamation Plants, is the result, in part, of the high chloride levels in SWP deliveries, which have resulted in elevated chloride levels in treated wastewater that is recycled locally as well as discharged to the Upper Santa Clara River (USCR). The Sanitation Districts' member agency, the Santa Clarita Valley Sanitation District, must provide advanced treatment to remove chloride from wastewater to comply with limits based on the USCR Chloride Total Maximum Daily Load (TMDL) for its discharges. The cost to comply with the USCR Chloride TMDL is expected to exceed \$100 million, thus increasing the annual cost for wastewater treatment despite the fact that the SWP water used by the community contains chloride levels that approach and sometimes have exceeded the chloride discharge and water recycling limits. We understand that implementation of the BDCP should reduce salinity levels in, and improve the quality of, SWP water, thus providing a water quality benefit to Southern California including Santa Clarita.

If you have any questions or require additional information, please contact me at pfriess@lacsd.org or at (562) 908-4288, extension 2501.

Very truly yours,

Grace Robinson Hyde



Philip L. Friess
Department Head
Technical Services

PLF:djm