



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON CHAN
Chief Engineer and General Manager

May 9, 2013

Via Electronic Mail and U.S. Mail

Cindy Messer
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

Dear Ms. Messer:

**Comment Letter Regarding Delta Plan Additional Document
Modified Economic and Fiscal Impact Statement: STD 399 plus Attachment 1**

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to review and comment on the Delta Stewardship Council's (Council's) Economic and Fiscal Impact Statement, dated April 8, 2013. As background, the Sanitation Districts consist of 23 independent special districts that provide for the wastewater and solid waste management needs of over five million people in 78 cities and unincorporated areas within Los Angeles County. On the wastewater management side, the Sanitation Districts operate ten water reclamation plants that currently supply approximately 95,000 acre-feet per year of recycled water to over 700 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 over 2.5 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.

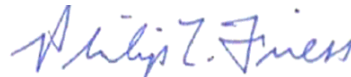
Our comments reflect the Sanitation Districts' long involvement with and significant investment in the development of water recycling and the unique institutional and regulatory conditions that the Sanitation Districts experience in Los Angeles County. In short, the Sanitation Districts support implementation of the Delta Conveyance Facilities because the resulting significant improvements in the salinity of State Water Project (SWP) water would in turn reduce the salinity of recycled water. 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 its water reclamation plants. Many potential users of recycled water express concern that irrigating with water with a higher salt content than other sources will adversely impact their plantings. Lower salinity recycled water will also greatly improve the feasibility and cost of implementation measures local agencies must take in accordance 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 will increase its use.

One example of local salinity limits affecting two of the Sanitation Districts' water reclamation plants, the Upper Santa Clara River Chloride Total Maximum Daily Load (USCR Chloride TMDL), is the result, in part, of the high chloride levels in SWP deliveries. The Sanitation Districts' member agency, the Santa Clarita Valley Sanitation District, faces the expensive burden of providing advanced treatment to remove chloride from wastewater to comply with the TMDL for its recycled water discharges. The cost to comply with the USCR Chloride TMDL is expected to exceed \$100 million for a community of 200,000 and would increase the annual cost for wastewater treatment by over 40 percent despite the fact that the SWP water used by the community contains chloride levels that approach and sometimes have exceeded the chloride limit. We understand that implementation of the Delta Conveyance Facility would greatly reduce chloride levels to southern California including Santa Clarita. Such improvement might eliminate the need for advanced treatment facilities in Santa Clarita.

If you have any questions or require additional information regarding this letter, please contact Mr. Raymond Tremblay of the Sanitation Districts' staff at rtremblay@lacsdsd.org or at (562) 908-4288, extension 2761.

Very truly yours,

Grace Robinson Chan



Philip L. Friess
Department Head
Technical Services

PLF:RLT:imb

cc: Ray Tremblay