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EXECUTIVE SUMMARY

BACKGROUND

County Sanitation Districts of Los Angeles County

The County Sanitation Districts of Los Angeles County (Districts) are a confederation of independent special districts that serve the wastewater treatment and solid waste management needs of approximately five million people in Los Angeles County. The Districts' service area covers approximately 765 square miles and encompasses 78 cities as well as unincorporated territory within the county.

The Districts were formed under authority provided by the County Sanitation District Act of 1923 (Act). The Act authorized the formation of sanitation districts based on topographic boundaries, rather than on political boundaries, in order to provide efficient wastewater management. As defined in the Act, the Districts' role is to construct, operate, and maintain facilities to collect, treat, and dispose of wastewater and industrial wastes. A 1949 amendment to the Act authorized the Districts to provide solid waste management and disposal services, including refuse transfer and resource recovery. Local sewers and solid waste collection are the responsibility of the local jurisdictions.

The Districts are composed of 25 separate districts that work cooperatively under a Joint Administration Agreement (JAA) which provides for a single administrative staff, headquartered near Whittier. Each district pays its proportionate share of joint administration costs, and each has a separate board of directors that consists of the presiding officers of the governing bodies of local jurisdictions located within that district.

Collectively, the Districts own, operate, and maintain over 1,200 miles of main trunk sewers and 11

wastewater treatment plants with a total capacity of 625.6 million gallons per day (mgd). The Districts currently convey and treat an average of 520 mgd of wastewater. Approximately 35 percent of all effluent is suitable for reuse. The service area and facilities of the Districts are shown in Figure ES-1.

Santa Clarita Valley Joint Sewerage System

Districts Nos. 26 and 32, shown in Figure ES-2, provide sewerage services to the Santa Clarita Valley located in the northwestern portion of Los Angeles County. The two districts jointly operate a regional system known as the Santa Clarita Valley Joint Sewerage System (SCVJSS). The SCVJSS service area includes the City of Santa Clarita and unincorporated Los Angeles County. The governing board for both Districts consists of three Directors: the Mayor and a City Council member of the City of Santa Clarita, and the Chair of the Los Angeles County Board of Supervisors. The SCVJSS consists of an interconnected network of more than thirty miles of trunk sewers, one pumping plant, and two water reclamation plants (WRP). The two WRPs, the Saugus Water Reclamation Plant (SWRP) and the Valencia Water Reclamation Plant (VWRP), also shown in Figure ES-2, provide tertiary treatment (biological treatment followed by filtration and disinfection).

The SCVJSS was officially formed in July 1984 when Districts Nos. 26 and 32 entered into a Joint Powers Agreement (JPA). In addition to receiving benefits of larger administrative and support staffs by being signatories to the JAA, Districts Nos. 26 and 32 also benefit under the JPA in joint financing, construction, operation, and maintenance of a regional wastewater system. Under the JPA, District No. 26 would continue to be primarily served by the SWRP and any flow exceeding the capacity of the SWRP would be conveyed to the VWRP for treatment.

INTRODUCTION

The SCVJSS currently treats an average annual flow of 15.0 mgd (1996 annual mean). Flow projections through the year 2015 were determined by applying an average per capita residential/commercial generation rate to the most recent Southern California Association of Governments (SCAG) population projections. Since Districts Nos. 26 and 32 were created for the purpose of managing wastewater within the SCVJSS service area, a plan is needed to accommodate this projected flow. According to these flow projections, the system's 19.1 mgd capacity will be exceeded in 1999. In fact, even committing to the most expeditious schedule possible, the SCVJSS will possibly need to treat flows in excess of this capacity due to the lead time needed to plan, design, and construct additional facilities. Nevertheless, due to the conservative design of the existing facilities, including flow equalization, the SCVJSS will be able to treat all flows and comply with discharge requirements during the interim period until construction is completed.

Districts Nos. 26 and 32 have, therefore, prepared this facilities plan (project report) and the associated environmental impact report (EIR) to address the wastewater management needs of the SCVJSS through the year 2015. This document, entitled the *2015 Santa Clarita Valley Joint Sewerage System Facilities Plan and EIR*, has integrated both the facilities plan and EIR into a single report with the following distinguishable parts: Part I (Chapters 1-7) - 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan (2015 Plan), Part II (Chapters 8-24) - 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan Environmental Impact Report (2015 Plan EIR), and Part III (Chapters 25 and 26) - Public Participation Program. This document was prepared by Districts' staff. Associated Traffic Consultants assisted in preparation of Chapter 12. Jones and Stokes Associates assisted in the preparation of Chapters 16 and 18.

The 2015 Plan addresses the need to expand and upgrade the SCVJSS in order to accommodate the projected population growth for the planning area through the year 2015. In addition, the 2015 Plan discusses biosolids disposal and wastewater conveyance needs, and water reuse opportunities. The purpose of the 2015 Plan EIR is to analyze the environmental effects of the 2015 Plan alternatives and present ways to reduce or avoid adverse effects. The California Environmental Quality Act (CEQA) requires that state and local government consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects. This executive summary for the 2015 Plan and EIR provides a synopsis of the 2015 Plan, and the environmental impacts and mitigation measures identified in the EIR.

THE PLANNING OBJECTIVE

The objective of the 2015 Plan is *to provide for the necessary wastewater conveyance, treatment, and disposal facilities to meet the needs of the projected service area for Districts Nos. 26 and 32 through the year 2015 in a cost-effective and environmentally sound manner.*

SELECTION AND SUMMARY OF THE 2015 PLAN ALTERNATIVES

A wide range of alternatives were evaluated based on the need and planning objective. The analysis of project alternatives involved developing and evaluating the feasibility of a series of project alternatives based on both: 1) necessary, and 2) performance-based screening criteria. Through this two-tiered screening process, an alternative was identified as the recommended project due to its relative superiority over the other alternatives.

First-Level Screening: Necessary Criteria

There are a number of necessary criteria that define the 2015 SCVJSS needs and/or constrain develop-

ment and evaluation of project alternatives. These necessary criteria represent the broad-based planning goals for the SCVJSS, ensure compliance with the planning objective, and constitute minimum requirements for any feasible alternative. The criteria identified as necessary for any feasible alternative are as follows:

Accommodate Flow

The 2015 Plan must anticipate increases in wastewater flow in the projected service area of Districts Nos. 26 and 32, and plan for necessary future wastewater conveyance, treatment, and disposal facilities. Future wastewater flow was estimated through a disaggregation of the most recent SCAG population projections (consistent with the City of Santa Clarita's projections) and forecasts of industrial and contracted flow through the planning horizon. The recommended project must ultimately provide sewerage service to a population of approximately 321,000 in 2015. This population, along with industrial and contracted flows, will generate approximately 34.2 mgd of wastewater flow which must be accommodated by the SCVJSS facilities.

Furthermore, the flow projections demonstrate the immediate need for a project as existing SCVJSS capacity will be exceeded by 1999.

Continue Tertiary Treatment

Currently, all treated effluent from the SCVJSS is discharged into the Santa Clara River. The RWQCB, through its NPDES permits, regulates the quality of effluent discharged to surface waters by specifying limits for constituents in the effluent and parameters for discharge. Since the VWRP and the SWRP will continue to discharge all or portions of their effluent to the Santa Clara River, they must comply with the discharge limits. Tertiary treatment is necessary to ensure compliance with the permit limits and to

ensure that reclaimed water for reuse will be available when viable projects are implemented.

In addition, upgrade of existing and new facilities will be required for reduction of ammonia in receiving waters to meet requirements specified in the Regional Water Quality Control Board's Basin Plan, to protect fish and other aquatic life.

Preserve Regional System

The joint operation of the SCVJSS has proven to be beneficial as it provides for sharing of resources that allows for cost-effective operation of the regional system. Due to the cost-effectiveness of this approach, the SCVJSS will maintain centralized solids processing at the VWRP for this planning horizon. Based on this experience and the inherent operational flexibility of an integrated system, the continued need for a regional system was identified as a necessary component of any feasible alternative.

Maintain Consistency with Previous Planning

The 2015 planning process builds upon the foundation of previous planning efforts and remains consistent with the objectives and the means to achieve those objectives identified in the previous planning efforts. Maintaining consistency with previous planning efforts ensures that any feasible alternative will be a logical evolution of the current SCVJSS.

Comply with Regulatory Requirements

Any feasible alternative must comply with a variety of federal, state, and local rules and regulations. Any feasible alternative must also consider other regulations and requirements that are specific to the site selection and operation of any proposed facility. Furthermore, the 2015 Plan and the resulting recommended project must comply with the provisions of CEQA.

Based on the first-level screening process, the feasible alternatives summarized in Table ES-1 were formulated and analyzed as to their ability to meet the necessary criteria specified above.

Expansion of the Valencia WRP

In order to assess the feasibility of expansion at the VWRP, a detailed site analysis was conducted. It was determined that the VWRP has adequate site capacity for additional expansion. The additional site capacity can be provided at two locations: 1) the approximately 15-acre developed southern portion of the site (for both additional wastewater treatment and solids processing), and 2) the approximately five-acre undeveloped area at the north end of the site. The feasibility of the concept was evaluated using the necessary criteria, and it was determined that expansion of the VWRP met all the necessary criteria.

Expansion of the Saugus WRP

As with the VWRP, a detailed site analysis of the SWRP was conducted to assess the possibility of expansion. The SWRP site, however, was found to not support expansion due to topographical constraints and restrictions imposed by adjacent land uses. The SWRP is bordered by railroad lines to the

north and west, steep embankments to the east, and a Metropolitan Water District easement to the south. As such it was determined that expansion of the SWRP was not a feasible alternative.

Construction of an Additional WRP

Two general locations were initially identified as possible sites for construction of a third WRP: 1) eastern Santa Clarita Valley, or 2) western Santa Clarita Valley. While evaluation of growth projections indicated sufficient flow to site a 6 mgd facility in the eastern valley area, expansion of the VWRP would still be necessary to treat the remaining flow generated in the entire SCVJSS service area. Additionally, environmental and operational impacts would be greater by siting a new WRP rather than the recommended project which expands existing facilities. Economic factors also indicated expansion of existing facilities would be more cost effective, both operationally and with respect to the unit cost associated with water reuse; costs associated with constructing and operating a new WRP would greatly outweigh those additional costs to construct and operate a reclaimed water delivery system from the SWRP and/or VWRP. Locating a new WRP in the eastern part of the valley, therefore, was not selected.

**Table ES-1
SUMMARY OF THE FIRST-LEVEL SCREENING PROCESS**

CONCEPTUAL ALTERNATIVE	ACCOMMODATES FLOW	MAINTAINS REGIONAL SYSTEM	CONSISTENT WITH PREVIOUS PLANNING	CONTINUES TERTIARY TREATMENT	MEETS REGULATORY REQUIREMENTS
Expansion of the VWRP	✓	✓	✓	✓	✓
Expansion of the SWRP		✓	✓	✓	✓
Construction of an Additional WRP		✓		✓	✓
Process Modification of SCVJSS WRPs		✓			
No Project		✓	✓	✓	

A site in the western part of the valley was also not selected since all of the necessary selection criteria would not be satisfied and there would be relatively higher environmental and operational impacts of siting a new WRP. Furthermore, the topography would require costly pumping of solids uphill to the VWRP which would reduce the advantages of centralized solids processing. Also, the environmental impacts associated with developing a new site were considered potentially much greater than those for constructing additional facilities at the extensively studied existing VWRP and SWRP sites. As such it was determined that the concept of constructing a third water reclamation plant was not a feasible alternative since more cost effective and operationally advantageous developable site capacity was identified at the VWRP.

Process Modification of the SCVJSS Facilities

The types of process modifications considered as a means of increasing WRP capacity to accommodate 2015 flow included changing unit processes (e.g., changing to a pure-oxygen activated sludge process for secondary treatment), altering design criteria, and increasing utilization of flow equalization. Given the necessity for continued tertiary treatment, the types of process modification examined could not accommodate the flow while maintaining the same level of treatment. They also have relatively high operation and maintenance costs and are inconsistent with previous planning documents. As such, this alternative was deemed undesirable.

No Project

CEQA requires that the No Project Alternative be considered along with other project alternatives during the planning process. The No Project Alternative is investigated to provide a baseline of environmental impacts for comparison with the other alternatives. As the No Project Alternative does not

accommodate the projected flow, thus not meeting the planning objective, it was also considered infeasible.

Given the screening analysis outlined above, the only feasible alternative that meets all of the necessary screening criteria is expansion of the VWRP.

Second-Level Screening: Performance-Based Criteria

Performance-based screening criteria was used to develop the conceptual alternative, expansion of the VWRP, to a detailed project alternative. The criteria used are summarized into three general categories and, accordingly, the recommended alternative was developed to:

Minimize Environmental Impacts

The new layout at the VWRP would continue to use the existing outfall, therefore, localizing the discharge area, which in turn minimizes the potential impacts on the species in the vicinity of the WRP. The layout was conceived to avoid any construction or operational incursion into a conservation easement adjacent to the site, thereby preserving riparian habitat. The expansion of the VWRP would also occur in an area already developed, precluding the elimination of open space. A more detailed summary of the environmental impacts of the proposed alternative is described under Part II of this Executive Summary.

Provide for Cost Effectiveness

By maintaining the regional system concept and by utilizing already acquired land, the expansion of the VWRP was determined to be less costly than siting a new WRP. Avoiding site acquisition and permitting costs, maintaining treatment of solids at a centralized site rather than at the individual sites, and use of existing support facilities and staffing provide for cost effectiveness. Also, the economic advantages of expanding at an active site are realized because

certain existing unit processes simply need to be expanded incrementally. Furthermore, existing equalization tanks and outfalls at the VWRP were deemed adequate for the expected increased flow.

Provide for Good Engineering and Operation

The advantages of maintaining a regional system are also realized in terms of operational benefits. The design of the integrated system would provide for more flexibility for flow allocation between the SCVJSS WRPs. Also, continued centralized solids processing would allow for easier transport of bio-solids as the mass is concentrated at one site. Another measure employed to minimize engineering impacts is to design the VWRP plant expansion in modular segments with independent primary and secondary unit processes. For example, to preserve the existing headworks, which could not simply be incrementally expanded without considerable redesign, the expansion on the north parcel of the VWRP was designed with independent influent pumps, comminutors, and grit chambers. The independent headworks also allows for more flexible operation as flows tributary to the VWRP can be distributed between the two headworks, as appropriate.

The Recommended Project

The screening process summarized above has identified the optimum treatment alternative: the incremental expansion of the VWRP bringing the total site capacity to 27.6 mgd. In addition, nitrification-denitrification at the SWRP and VWRP will be implemented to reduce ammonia levels in the effluent and receiving waters. Therefore, the recommended project consists of two components: 1) expansion of the VWRP in two stages, and 2) upgrade of both the SWRP and the VWRP to include nitrification-denitrification for reduction of ammonia. The following is a summary of the recommended project:

- *VWRP Stage V Expansion*: 9 mgd expansion on the southern portion of the site (expected startup in 2002).
- *VWRP Stage VI Expansion*: 6 mgd expansion on the north parcel (expected startup in 2010).
- *SWRP and VWRP Upgrade*: Modification of existing facilities to include nitrification-denitrification (expected startup in 2003).

Project Cost and Financing

As shown in Table ES-2, the capital cost of the recommended project including the associated solids processing facilities is approximately \$61 million. For purposes of preliminary financial analysis, the project can be divided into two components, upgrade (for the benefit of existing users) and expansion (for the benefit of new users). These respective costs are approximately \$2.5 million and \$58.5 million.

The upgrade portion of the project will be funded by the existing users through the Districts' Service Charge Program (annual user charge). The upgrade capital cost which has been amortized over a number of years to lessen the impact in any given year, equates to approximately \$3 per single family home per year (commercial and industrial users would pay proportionally). The estimated additional annual cost of operating upgraded facilities is roughly \$3 per single family home per year in 1997 dollars.

The expansion portion of the project will be funded by new users through the Connection Fee Program and will not affect the service charge rates for the existing users. It is anticipated that long-term financing in the form of SRF loans will be used to facilitate construction of facilities and connection fee revenues will be used to repay the loan indebtedness. While there will be increased annual costs associated

**Table ES-2
SCVJSS RECOMMENDED PROJECT COST BREAKDOWN***

PROJECT	CONSTRUCTION COSTS	DESIGN AND CONSTRUCTION MANAGEMENT	CAPITAL COST TOTAL	ANNUAL O&M	EQUIVALENT ANNUAL COST^b
VWRP Stage V	\$28,020,000	\$5,670,000	\$33,690,000	\$3,830,000	\$6,530,000
VWRP Stage VI	\$20,650,000	\$4,110,000	\$24,760,000	\$2,560,000	\$4,550,000
SWRP Upgrade	\$960,000	\$190,000	\$1,150,000	\$70,000	\$160,000
VWRP Upgrade	\$1,150,000	\$230,000	\$1,380,000	\$110,000	\$220,000
TOTAL	\$50,780,000	\$10,200,000	\$60,980,000	\$6,570,000	\$11,460,000

Notes: a) 1997 dollars.
b) Amortized at 5% annual interest rate for 20 years.

with operating expanded facilities, there will also be an increase in the number of users accommodated by the expansion. Therefore, this increase in operating costs will be matched by increased revenue and will not result in an increase in the annual user charge for the existing users.

SUMMARY OF THE 2015 PLAN ENVIRONMENTAL IMPACT REPORT

The purpose of the 2015 Plan EIR is to identify and describe, environmental effects associated with the 2015 Plan. Any significant environmental impacts which cannot be avoided, cumulative impacts of all past, present, and reasonably anticipated future projects, growth-inducing impacts, feasible mitigation measures to minimize the significant impacts, and lastly any significant irreversible environmental impacts, are discussed in the EIR.

The following topics are analyzed in this EIR:

- Land Use
- Geologic Hazards and Soils
- Energy and Chemicals
- Transportation
- Air Quality

- Noise
- Aesthetics
- Hydrology
- Water Quality
- Biological Resources
- Public Health
- Public Services and Facilities
- Cultural Resources
- Population, Employment, and Housing
- Cumulative, Growth-Inducing, and Growth-Related Impacts

The impact analysis contained in the EIR grouped potential impacts into categories based on the effect and the feasible mitigation measures available to reduce the effect. The categories used are as follows:

- *Beneficial Impact*: A positive change in the environment.
- *Less than Significant Impact*: No substantial adverse change in the environment and requires no mitigation measures.
- *Significant Avoidable Impact*: A substantial adverse effect on the environment that can be reduced to a less than significant level by implementing mitigation measures.

- **Significant Unavoidable Impact:** A substantial adverse effect on the environment for which insufficient feasible mitigation measures are available to reduce the impact to a less than significant level.

The EIR analyzes potential construction and operation impacts of the recommended project. Construction impacts involve those due to the building of new or modifying existing facilities. Operations impacts are those that would result from the operation of facilities.

Biosolids disposal and reuse impacts, which would result from either the transport of biosolids or their end use at offsite locations, are summarized for all resource areas following the discussion on construction and operations impacts. The impacts of the No Project Alternative for all resource areas are also summarized.

Land Use

The impact analysis focused on the siting and construction of new facilities under both the expansion and upgrade components of the recommended project, and their compatibility with the surrounding land uses.

Construction Impacts

The expansion will involve construction activities adjacent to a conservation easement granted to the state of California Department of Fish and Game. The conservation easement stipulates that the property be retained forever in a natural state. In order to eliminate the need to enter the easement area for construction activities, all proposed facilities at the VWRP would be sited no closer than 10 feet from the conservation easement. As a result, this impact is considered less than significant.

Operations Impacts

A site analysis found that both the expansion and the upgrades would be compatible with the adjacent land uses. Thus, this impact is considered less than significant.

Geologic Hazards and Soils

The impacts in this chapter were evaluated based on standard geologic and soil practices and geotechnical studies conducted at the VWRP.

Construction Impacts

Construction of the expansion at the VWRP would potentially cause the following significant avoidable impact related to geologic hazards and soils:

- Increased short-term erosion, which can be mitigated to a less than significant level by implementing an erosion control and rehabilitation plan (**Mitigation Measure 10-1**).

Operations Impacts

Operation of the new and upgraded facilities would potentially cause the following significant avoidable impacts related to geologic hazards and soils:

- Structural damage from siting facilities in a Seismic Risk Zone, which can be mitigated by implementing appropriate engineering considerations (**Mitigation Measure 10-2**).
- Unstable earth conditions from siting facilities on ground with liquefaction potential at both the SWRP and VWRP, which can be mitigated by implementing appropriate engineering considerations (**Mitigation Measure 10-3**).

Several less than significant operations impacts could occur including minimal potential for structural damage or injury resulting from siting facilities on ground subject to subsidence or on expansive soil.

Energy and Chemicals

This analysis focused on whether the recommended project would result in the use of energy or chemicals in a wasteful manner, consume enough energy to cause suppliers difficulty in meeting the increased energy demand, or require construction of additional facilities for energy generation or distribution.

Construction Impacts

There would be a less than significant construction impact resulting from a minimal increase in energy consumption during construction of the recommended project.

Operations Impacts

While operation of both the expansion and the upgrade will result in relatively higher energy and chemicals usage, there will not be any wasteful use nor a need for the construction of additional production or delivery facilities. Therefore, the impact of increased electricity, natural gas, and chemical use under the recommended project is less than significant.

Transportation

The trips expected to be generated as a result of the recommended project were estimated and added to the existing and projected traffic volumes on the adjacent roadway system, and their impacts were analyzed at five key intersections in the vicinity of the VWRP site.

Construction Impacts

The recommended project will cause a minimal degradation of the level of service at key intersections during construction. Therefore, it will have a less than significant impact on transportation.

Operations Impacts

An operations impact analysis based on future 2002 and 2010 cumulative traffic volumes (the total of existing traffic, normal traffic growth, and traffic from related projects as well as the proposed expansions) indicates that four of the five key intersections will exceed acceptable level of service. However, the increase in the volume to capacity ratio due to project-related traffic during operation of the proposed facilities is less than the significance threshold value, therefore, the impact of the recommended project alone is considered to be less than significant.

Air Quality

The analysis of impacts used existing VWRP operating emission levels and estimates for VWRP expansion-related air emissions from both direct and indirect sources for identification of potential air quality impacts and recommendations for feasible air quality mitigation measures.

Construction Impacts

Construction of the VWRP expansion would cause the following significant unavoidable impact on air quality:

- A short-term increased emissions of inhalable particulates at the VWRP, which can be reduced, but not to a less-than-significant level, by applying nontoxic soil stabilizers, replacing ground cover,

enclosing exposed soil stockpiles, watering exposed sites and unpaved areas, enforcing requirements that trucks either be covered or meet freeboard requirements before leaving the work-site, removing loose soil from adjacent streets, and limiting traffic speeds (**Mitigation Measures 13-1, 13-2, 13-3, 13-4, 13-5, 13-6, 13-7, 13-8**).

Due to the minor nature of the proposed upgrades at the SWRP and VWRP, no significant impacts on air quality are anticipated from construction. In particular, the impact of short-term increase in inhalable particulates under the upgrades is considered less than significant.

Other less than significant construction impacts on air quality for the recommended project include the potential for short-term increases in nitrogen oxide, sulfur oxide, carbon monoxide, ROG, or microscale carbon monoxide emissions, and the potential for release of asbestos from renovation of an existing structure (digester heating building).

Operations Impacts

Neither the expansion nor the upgrades have any significant operations impacts on air quality. The less than significant operations impacts include potential long-term increases in emissions of ROG, nitrogen oxides, carbon monoxide, sulfur oxides, and particulates. Furthermore, under the recommended project there would be a less than significant impact due to the long-term increase in odors as well as from the increase in cancer risk resulting from toxic air pollutants.

Noise

Estimates of noise levels under the recommended project were compared against standards from the *Los Angeles County General Plan*, *Los Angeles County Noise Control Ordinance*, and *City of Santa Clarita General Plan* to identify noise impacts.

Construction Impacts

All construction impacts are considered less than significant because the increase in noise levels due to construction of the recommended project would be below the significance thresholds for construction vehicle and equipment noise.

Operations Impacts

Similarly, the projected operations noise levels would be below the ambient noise significance thresholds. Therefore, noise impacts from operations are considered less than significant.

Aesthetics

CEQA requires that the visual quality in the vicinity of a proposed project be protected or even enhanced in order to offset potential undesirable aesthetic impacts of the project.

Construction Impacts

Through the identification and subsequent avoidance of visually sensitive areas, construction activities would not significantly reduce visual quality at the SWRP or VWRP. Therefore, the potential temporary reduction in visual quality resulting from construction is considered less than significant.

Operations Impacts

There is, however, an avoidable significant operations impact on aesthetics due to the construction of the expansion of the VWRP. The impact is as follows:

- The proposed expansion includes the construction of new facilities and the modification of existing facilities at the VWRP. Some new structures would contrast in form, line, color, or texture with their immediate surroundings. The impact can be reduced to a less than significant level by

screening at least 30 percent of views of the new elements within 10 years of completion of construction (**Mitigation Measure 15-1**).

Due to the minor nature of the upgrades at the SWRP and VWRP, the upgrade component will not have a significant impact resulting from the introduction of new elements.

The potential for reduction in visual quality resulting from increased light and glare at the SWRP and VWRP under the recommended project is considered a less than significant operations impact.

Hydrology

Future discharge levels to the Santa Clara River will be contingent on the amount of future wastewater generated and the extent of future water reuse in the Santa Clarita Valley. It is conceivable that, despite an increase in the amount of wastewater generation, future discharge levels to the river could decrease as a result of relatively greater reclaimed water reuse. Therefore, in order to thoroughly assess the potential impacts of future changes in discharge to the Santa Clara River, the following six discharge scenarios were developed:

- *No Discharge Scenario*: SWRP: 0 mgd, VWRP: 0 mgd.
- *Reduced Discharge Scenario*: SWRP: 5.0 mgd, VWRP: 4.6 mgd.
- *Existing Discharge Scenario*: SWRP: 5.7 mgd, VWRP: 9.3 mgd.
- *Permitted Discharge Scenario*: SWRP: 6.5 mgd, VWRP: 12.6 mgd.
- *Recommended Project Discharge Scenario*: SWRP: 6.5 mgd, VWRP: 27.6 mgd.

- *Cumulative Discharge Scenario*: SWRP: 6.5 mgd, VWRP: 27.6 mgd, Newhall Ranch WRP: 5.0 mgd.

The analysis conducted in three resource areas, hydrology, water quality, and biology, utilize these discharge scenarios to assess impacts. In general, the No Discharge Scenario is not extensively analyzed due to its inherent adverse impacts on the river.

Construction Impacts

Two construction-related impacts on hydrology were analyzed for the recommended project and determined to be less than significant. First, the recommended project could potentially result in flooding and erosion at the VWRP. However, an existing retaining wall would be extended as part of the recommended project to protect the proposed facilities at the north end of the VWRP. Therefore, there would be a less than significant impact from property damage resulting from inundation or channel modification.

Second, the recommended project could potentially result in a reduction in flood flow capacity of the Santa Clara River at the SWRP and VWRP. However, facilities that would be added or modified as part of the proposed expansion or upgrades would not encroach into the 100-year floodplain at either WRP. Therefore, there will be a less than significant impact to flood flow capacity.

Operations Impacts

All operations impacts under the recommended project were also considered to be less than significant. The operations impacts identified as less than significant include: the potential for increase in extent or severity of downstream flooding, the

potential for loss of water for groundwater recharge and downstream water users, and the potential for reduction in aquatic habitat.

Water Quality

The water quality impacts of the recommended project were identified with regard to its effects on the water resources in the Santa Clarita Valley and downstream areas and related beneficial uses.

Construction Impacts

As a result of the construction of the VWRP expansion, the following significant avoidable construction impact on water quality was identified:

- Construction activities related to expansion of the VWRP would expose disturbed and unstable soils to weathering effects of precipitation and wind. Increased erosion and sedimentation could occur if soil is exposed during wet periods. Suspended sediments could increase turbidity in receiving streams; decrease dissolved oxygen levels; and increase concentrations of nutrients, metals, and other pollutants associated with sediment particles. This impact is considered significant but will be mitigated to less than significant through the preparation and implementation of Stormwater Pollution Prevention Plan. The Stormwater Pollution Prevention Plan is based on the use of measures to prevent erosion, prevent pollutants from construction activities from mixing with stormwater, and trap pollutants before they can be discharged (**Mitigation Measure 17-1**).

This same impact under the upgrade component of the recommended project is considered less than significant due to the minor nature of the associated construction activities.

Operations Impacts

A number of potential operations impacts on water quality were determined to be less than significant under the recommended project. These less than significant impacts include: the potential for groundwater quality degradation due to recharge, the potential for water quality degradation in the Santa Clara River resulting from increased discharge of reclaimed water from the VWRP, the potential for water quality degradation resulting from increased reuse of reclaimed water, the potential for water quality degradation in the Santa Clara River due to plant upset or emergency release of effluent, and the cumulative impact on water quality from existing and foreseeable similar facilities.

In addition, the operation of the expansion and upgrades were analyzed for potential impact on the beneficial use of the Santa Clara River as a warm freshwater habitat. In particular, the analysis focused on five parameters: ammonia, temperature, dissolved oxygen, turbidity, and chlorine. Due to the inclusion of a nitrification-denitrification process for both existing and proposed facilities, which will reduce ammonia levels in the treated effluent discharged to the river, the recommended project is, therefore, considered to have a beneficial impact because of reduction of potential ammonia toxicity. The recommended project was determined to have a less than significant impact on the other four water quality parameters.

Biological Resources

The impacts of the recommended project on the biological resources of the Santa Clara River and the proposed construction sites at the SWRP and VWRP were analyzed.

Construction Impacts

One avoidable, significant construction impact of the expansion, the potential for loss of riparian vegetation and wildlife habitat at the VWRP, was identified as follows:

- While the Stage V expansion will occur within the footprint of existing VWRP facilities, the Stage VI expansion will occur on a site adjacent to and directly north of existing VWRP facilities. Some of this area is on a low terrace, dominated by an old stand of southern cottonwood/willow riparian forest that has a high value for wildlife habitat.

Construction activities related to the proposed recommended project would result in the direct loss of approximately 0.4 acre of southern cottonwood/willow riparian forest. Additionally, potential exists for disturbance of this habitat type outside of the development footprint.

The loss of riparian vegetation and wildlife habitat is considered a significant impact on biological resources, therefore, two mitigation measures will be implemented to reduce the impact to less than significant: 1) replace the lost cottonwoods at a 3:1 ratio (**Mitigation Measure 18-1**), and 2) revegetate the riparian areas disturbed by construction (**Mitigation Measure 18-2**).

The balance of the construction impacts of the recommended project, including: the potential for loss of ruderal area; the potential for loss of foraging habitat of and disturbance to Least Bell's vireos, southwestern willow flycatchers, and western yellow-billed cuckoos; and the potential for impacts on other special-status wildlife species, were considered to be less than significant.

Operations Impacts

Most operations impacts of the recommended project were considered less than significant. Less than significant impacts include: potential loss of established riparian vegetation and wildlife habitat from prolonged inundation or scouring, potential for reduction in reproductive success of riparian vegetation, potential for reduction in special-status fish species, potential for water quality impacts on riparian vegetation, potential for loss of riparian special status wildlife species, potential for hybridization of special-status fish species, and potential for loss of physical habitat associated with flow regime. The potential water quality impact¹ on fisheries is considered beneficial with regard to ammonia reduction due to the inclusion of a nitrification-denitrification process as part of the recommended project.

Public Health

This resource area specifically addresses public health issues with regard to regulatory requirements related to hazardous materials, wastewater treatment, worker safety, and emergency response under the recommended project.

Construction Impacts

Construction of the recommended project is not anticipated to create any significant adverse public health impacts. The potential impact of exposure to hazardous materials to WRP employees is minimal. Also, there is a less than significant anticipated impact resulting from the potential short-term reduction in treatment capacity to allow for the construction of the upgrades.

1. The analysis of impact focused on five water quality parameters: turbidity, chlorine, ammonia, temperature, and dissolved oxygen.

Operations Impacts

Likewise, less than significant operations impacts on public health would occur under the recommended project, including the potential impact from the possible addition of an ammonia storage and delivery system necessitated by the nitrification-denitrification process upgrade, the potential impact of accidental release of acutely hazardous materials, and the potential exposure to hazardous materials.

Public Services and Facilities

Discussion of this resource area focusses on the impact of the recommended project on existing and planned public services and facilities in the SCVJSS service area.

Construction Impacts

Construction of the recommended project would cause a number of less than significant impacts on public services or facilities, including: potential for increase in emergency response times, increase in demand for emergency services, and increase in demand for landfill space resulting from construction waste.

Operations Impacts

Operations, as well, are not anticipated to cause any significant impacts on public services or facilities. Less than significant operations impacts include an increase in demand for fire protection, hazardous materials and emergency medical response. The increased supply of reclaimed water resulting from the recommended project is considered beneficial, since it would decrease the need to use alternate sources of water supply.

Cultural Resources

The impact analysis for cultural resources used information on existing cultural resources in the SCVJSS planning area and a survey of the VWRP site to determine the impact of the recommended project.

Construction Impacts

Surface inspections and the records search revealed no evidence of either prehistoric or early historic resources on the VWRP site and it was determined that the possibility of encountering buried cultural resources within the boundaries of the VWRP is remote. Therefore, the potential for disturbance of important buried archeological resources during construction is considered less than significant.

Operations Impacts

No structure on the SWRP or VWRP site could be characterized as historically important, as none have been standing for more than 100 years. Therefore, there are no significant operations impacts of the recommended project.

Population, Employment, and Housing

CEQA does not require an analysis of socioeconomic impacts, however, the EIR does provide this analysis for other reasons such as informing the residents and businesses within the SCVJSS service area of potential impacts.

Construction Impacts

An estimated 31 construction-related jobs would be created at the VWRP by the expansion of Stage V, and another 31 for Stage VI. The duration of construction for each expansion phase is approximately 30 months. In addition, a small number of construction related jobs would be created during the

upgrades. The duration of construction for the upgrade at each WRP is approximately 18 months. This construction impact on employment is considered beneficial.

Operations Impacts

An estimated 16 additional operation related jobs would be generated at the VWRP as a result of the expansion of Stages V (12 jobs) and VI (4 jobs). The operations of the proposed upgrades at the SWRP and VWRP are not expected to result in any increase in the number of permanent employees at those sites. This operations impact on employment is considered beneficial.

Cumulative, Growth-Inducing, and Growth-Related Impacts

Cumulative, growth-inducing, and growth-related impacts are discussed together since they are very closely related environmental impact categories. According to the State CEQA Guidelines, the definition of these three categories are as follows:

- ***Cumulative Impacts:*** Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.
- ***Growth-Inducing Impacts:*** Growth-inducing impacts are the direct or indirect impacts by which a project could foster economic or population growth. That includes projects that would *remove obstacles* to population growth such as an expansion of a wastewater treatment plant that might allow for more construction in a service area.
- ***Growth-Related Impacts:*** Growth-related impacts are the indirect impacts of growth or development, such as conversion of vacant land to developed land and increased demands for public services.

Districts Nos. 26 and 32 have no authority or ability to mitigate adverse impacts associated with growth. Districts Nos. 26 and 32's authority and responsibility is to provide wastewater management services. Mitigation authority and responsibility for growth rests primarily with local governments that regulate land use. CEQA allows the Districts to find that mitigation for such impacts is the responsibility of other public agencies that have adopted or should adopt such mitigation.

Cumulative Impacts

The State CEQA Guidelines consider a discussion of cumulative impacts as adequate if it uses either 1) the list method, or 2) the projection method. The list method looks into all past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the agency. The projection method evaluates the impacts by using a summary of projections contained in related planning documents which is designed to evaluate regional or areawide conditions. Although there are instances in the 2015 Plan EIR where the list method is used, the projection method is predominately used for the cumulative impact analysis.

Growth-Inducing Impacts

The recommended alternative under the 2015 Plan is designed to *accommodate* projected population growth as identified in the SCAG 96 forecast. Even though the 2015 Plan is not an important factor affecting regional economic and population growth, under strict CEQA definition of growth-inducement, the 2015 Plan is considered growth-inducing since it is regarded as *removing an obstacle* to growth within its service area. However, implementation of the mitigation measures to reduce impacts associated with growth to a less than significant level is the responsibility of other public agencies which have adopted or should adopt such mitigation.

Growth-Related Impacts

Numerous growth-related impacts and specific mitigation measures to address them are identified. The impacts and mitigation measures come from regional documents such as the *County of Los Angeles General Plan (1988)*, *Santa Clarita Valley Area Plan (1990)*, *City of Santa Clarita General Plan (1991)*, SCAG 1994 Regional Comprehensive Plan and Guide (adopted March 1996) and EIR, South Coast Air Quality Management District *1997 Final Draft Air Quality Management Plan*, and Regional Water Quality Control Board *Water Quality Control Plan for the Los Angeles Region* (adopted 1994). These documents evaluate the regional or areawide growth-related impacts and address their effects. The resource areas in which these impacts would potentially occur and their respective mitigation measures are as follows:

- Land Use (Mitigation Measure 23-1)
- Geologic Hazards and Soils (Mitigation Measures 23-2, 23-3)
- Energy (Mitigation Measure 23-4)
- Transportation (Mitigation Measure 23-5)
- Air Quality (Mitigation Measure 23-6)
- Noise (Mitigation Measure 23-7)
- Aesthetics (Mitigation Measure 23-8)
- Hydrology (Mitigation Measure 23-9)
- Water Quality (Mitigation Measure 23-10)
- Biological Resources (Mitigation Measures 23-11, 23-12)
- Public Health (Mitigation Measure 23-13)
- Public Services and Facilities (Mitigation Measures 23-14, 23-15, 23-16, 23-17, 23-18, 23-19)
- Cultural Resources (Mitigation Measure 23-20)

Biosolids Disposal and Reuse Impacts

Potential biosolids disposal and reuse impacts were identified for the following resource areas: Energy and Chemicals Use, Transportation, Air Quality, Noise, Aesthetics, Water Quality, Biological Resources, Public Health, Public Services and Facilities, and Cultural Resources.

All biosolids disposal and reuse impacts are considered less than significant. Districts Nos. 26 and 32 will use only sites that are properly permitted and that have fully addressed site-specific impacts and impacts related to biosolids reuse through the preparation of site-specific environmental documents as required for compliance with federal, state, and local regulations.

No Project Alternative

Under the No Project Alternative, no new facilities would be constructed and there would be no significant changes to current WRP operations. The SCVJSS could continue to operate up to its permitted capacity of 19.1 mgd. However, the projected flow in the 2015 planning area will exceed the treatment capacity in 1999 leading to potentially significant impacts to water quality, biological resources, and public health if treatment capacity is exceeded. In addition, likely ammonia toxicity due to elevated ammonia levels in the receiving water could cause significant impacts to water quality and biological resources. For the balance of the resources areas, all impacts are considered less than significant.

Significant Environmental Impacts and Mitigation Measures

The EIR discloses a number of potentially significant impacts of the recommended project. The significant impacts were identified through comparison of the impact of the project against significance criteria specified by the State CEQA Guidelines or according to other accepted professional practices.

Table ES-3 identifies significant impacts of the 2015 Plan recommended project. All of these significant impacts, save for one, potential short-term increase in inhalable particulates during construction at the VWRP can be reduced to less than significant through the application of appropriate mitigation measures. Mitigation measures associated with cumulative, growth-inducing, and growth-related impacts are not identified here. They are discussed in detail in Chapter 23, however, agencies other than the Districts, primarily local governments, are responsible for the implementation of those mitigation measures.

The mitigation monitoring program will be administered by Districts Nos. 26 and 32 and will include the use of worksheets as a means of tracking compliance. A separate worksheet will be prepared to monitor each mitigation measure and will include the following information: the impact being mitigated, the mitigation measure for that impact, the party responsible for implementing the mitigation measure, the implementation schedule, the party responsible for monitoring implementation, the monitoring schedule, and verification of compliance.

Irreversible Environmental Changes

The State CEQA Guidelines require an EIR to include a discussion of significant irreversible environmental changes that would result from implementation of a project. Irreversible commitments of resources would occur as a result of implementing the recommended project. These resources include the building materials, fossil fuels, labor, and energy required to construct, operate, and maintain wastewater treatment facilities associated with the recommended project. These resources also include land converted from its existing uses for construction of additional treatment facilities, for biosolids disposal and reuse sites, and for extraction of construction materials such as soil and/or aggregate.

Known Areas of Controversy

Section 15123(b) of the State CEQA Guidelines requires an EIR to identify areas of controversy known to the lead agency, including issues raised by other agencies and the public. No specific areas of controversy were identified during the development of the 2015 Plan and the scoping process. However, the Santa Clara River, as the largest remaining unchannelized river in Los Angeles County, is a resource of concern. More generally, traffic, noise, and air quality effects of construction at the SWRP and VWRP; potential treatment plant odors; the use of hazardous chemicals for wastewater treatment; and the quality and quantity of discharge to the Santa Clara River, including the potential for water reuse, are also issues of concern for the surrounding community.

Required Permits and Approvals

Federal, state, and local agencies will use this EIR to evaluate compliance of the 2015 Plan with statutory and regulatory requirements as follows:

- The State Water Resources Control Board for compliance with state revolving fund loan requirements, including coordination with the following federal and state reviewing agencies: the U.S. Environmental Protection Agency, U.S. Fish and Wildlife Service, and State Office of Historic Preservation.
- The Regional Water Quality Control Board for National Pollutant Discharge Elimination System permit renewals.
- South Coast Air Quality Management District for conformity of federal actions with federally approved State Implementation Plans and compliance with their CEQA Handbook and permit issuance.

**Table ES-3
SIGNIFICANT ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES OF THE
RECOMMENDED PROJECT**

SIGNIFICANT IMPACT	MITIGATION MEASURE
Geologic Hazards and Soils	
Potential for Increased Short-Term Erosion During Construction at the VWRP.	10-1: <i>Prepare and Implement an Erosion Control and Rehabilitation Plan.</i>
Potential for Structural Damage and Injury Resulting from Siting the Recommended Project in Seismic Risk Zone IV.	10-2: <i>Implement Appropriate Seismic Engineering Considerations for Facilities.</i>
Potential for Structural Damage Resulting from Siting the Recommended Project on Ground Subject to Liquefaction.	10-3: <i>Implement Appropriate Liquefaction Engineering Considerations for Facilities.</i>
Air Quality	
Potential for Short-Term Increase in Emissions of Inhalable Particulates Resulting from Construction at the VWRP. ^a	13-1: <i>Apply Nontoxic Soil Stabilizers to All Inactive Construction Areas.</i>
	13-2: <i>Establish a Vegetative Ground Cover to Disturbed Areas.</i>
	13-3: <i>Enclose, Cover, Water Twice Daily, or Apply Nontoxic Soil Binders to Exposed Piles.</i>
	13-4: <i>Apply Water to Active Sites.</i>
	13-5: <i>Cover or Maintain Freeboard Requirements When Hauling Loose Material.</i>
	13-6: <i>Sweep Paved Public Streets at End of Day to Remove Visible Soil.</i>
	13-7: <i>Apply Nontoxic Soil Stabilizers to Unpaved Parking and Staging Areas.</i>
	13-8: <i>Limit Traffic Speeds on All Unpaved Roads.</i>
Aesthetics	
Potential for Reduction in Visual Quality Resulting from Introduction of New Elements at the VWRP.	15-1: <i>Partially Screen New Elements from Public View Where Feasible.</i>
Water Quality	
Short-Term Water Quality Degradation Resulting from VWRP Expansion Construction Activities.	17-1: <i>Prepare and Implement a Stormwater Pollution Prevention Plan.</i>
Biological Resources	
Potential for Loss of Riparian Vegetation and Wildlife Habitat at the VWRP.	18-1: <i>Replacement of Lost Cottonwoods at a 3:1 Ratio.</i>
	18-2: <i>Revegetation of Riparian Areas Disturbed by Construction.</i>

Note: a) Cannot be reduced to a less than significant level.

- Southern California Association of Governments for review of the 2015 Plan's consistency with their forecasts and policies identified in the Regional Comprehensive Plan and Guide.

PUBLIC PARTICIPATION PROGRAM

The Districts designed a Public Participation Program for the 2015 Plan and EIR in order to integrate public and agency input into the facilities planning process. The State CEQA Guidelines encourage consultation throughout the CEQA process to allow the public to provide input to the decision makers on the range of actions and alternatives to be considered, potential significant impacts of the alternatives, and feasible mitigation measures.

The Districts identified several key periods during the preparation of the 2015 Plan and EIR at which time agencies and the public would have the opportunity to comment on the facilities planning and participate in the environmental review process. These key periods were a scoping comment period, a Draft 2015 Plan and EIR comment period, and a Final 2015 Plan and EIR comment period.

- *Scoping Comment Period:* The notice of preparation for the 2015 Plan EIR was distributed on April 24, 1996. To solicit comments and identify issues of concern from affected agencies and the public, an agency scoping meeting and a public workshop were held on April 27, 1997, and May 15, 1997, respectively.

The Districts also met to discuss the project with City of Santa Clarita Staff on October 16, 1996, and made a presentation on the preliminary plan to the City Council on February 25, 1997. In addition, the Districts met separately with the Southern California Association of Governments and the United States Fish and Wildlife Service in

May 1997, to discuss the planning assumptions and the scope of the environmental analyses.

- *Draft 2015 Plan and EIR Comment Period:* The comment period ended on September 3, 1997. A public hearing was held on August 27, 1997, to receive comments on the 2015 Plan and EIR. During this comment period, the Districts received written comments, which have been addressed in the Final 2015 Plan and EIR (Chapter 26).
- *Final 2015 Plan and EIR Comment Period:* Prior to consideration of approval of the 2015 Plan and certification of the EIR, the Districts prepared and submitted responses to all parties who submitted comments on the draft document (a summary is shown in Table ES-4). The Boards of Directors of Districts Nos. 26 and 32 are scheduled to hold a public meeting for consideration of approval of the 2015 Plan and certification of the EIR in January 1998.

Table ES-4
SUMMARY OF THE RESPONSES TO COMMENTS RECEIVED
ON THE DRAFT 2015 PLAN AND EIR

AGENCIES	COMMENTS	RESPONSES
County of Los Angeles, Department of Public Works Norman Cortez 1-Letter 7/17/97	1-1 No comments.	1-1 Comment noted.
State Water Resources Control Board, Division of Clean Water Programs Dan Little 2-Letter 8/11/97	2-1 Request for copies of NPDES and Water Reuse Permits, Water Conservation Program and Ordinances, updated Revenue Program, and number of SRF loans to be requested by Districts. 2-2 Need calendar year of flow data (TSS, BOD) to support Districts influent organic loadings. 2-3 Check 12 years of reserve capacity for eligibility. 2-4 Need basis for why design peaking factors are high.	2-1 The requested information was mailed to the SWRCB, on September 17, 1997. 2-2 The data is provided. The values reported for the VWRP are relatively high due to the interconnection of the VWRP and SWRP and the return of underflows to the head end of the treatment train. 2-3 Stage V will provide treatment capacity up to 27.7 mgd which is less than the 12 year eligible reserve capacity of 29 mgd. Stage VI will provide treatment capacity up to 34.1 mgd which would be reached in 2015, four years prior to the 12 year requirement. 2-4 A statistical analysis was performed on average and peak flow data from the VWRP from 1990-95, which substantiated the design values for the sanitary and storm peaking factors.
State Water Resources Control Board, Division of Clean Water Programs Wayne Hubbard 3-Letter 8/14/97	3-1 Request for 2 copies of Final EIR, Resolution of the Board, Notice of Determination, and notices of meetings and hearings. 3-2 Federal agencies review period expires on September 29, 1997.	3-1 Comment noted. The requested information will be sent to the SWRCB. 3-2 Comment noted. Districts will be accepting federal comments until September 29, 1997.

AGENCIES	COMMENTS	RESPONSES
<p>State Water Resources Control Board, Division of Clean Water Programs (Cont'd)</p> <p>Wayne Hubbard 3-Letter 8/14/97</p>	<p>3-3 One public hearing, noticed 30 days in advance, is required for an SRF loan project. Send copies of notices.</p> <p>3-4 Districts will need to adopt a Statement of Overriding Considerations.</p>	<p>3-3 One public hearing was held on August 27, 1997, and noticed on July 28, 1997, 30 days in advance. Copies were sent on August 26, 1997.</p> <p>3-4 Comment noted. Districts will adopt a Statement of Overriding Considerations.</p>
<p>Department of Transportation (CALTRANS)</p> <p>Stephen Buswell 4-Letter 8/19/97</p>	<p>4-1 Encroachment permit needed for construction adjacent to State right-of-way. Recommend truck trips to off-peak commute period.</p>	<p>4-1 Comment noted. All permits needed for construction will be secured. Impact of truck trips during peak commute periods was determined to be less than significant.</p>
<p>County of Los Angeles, Department of Public Works, Planning Division</p> <p>David Yamahara 5-Letter 8/27/97</p>	<p>5-1 Level of Service calculation should be conducted for existing plus ambient growth prior to existing plus project traffic and related projects' traffic.</p> <p>5-2 Existing lane configurations should be corrected for north and south approach of The Old Road and Magic Mountain Parkway, and west approach for the south and north bound ramps of I-5 and Magic Mountain Parkway.</p> <p>5-3 County agrees that project will not have any impact to the Congestion Management Program's roads and intersections.</p> <p>5-4 Recommend that the City of Santa Clarita and CALTRANS also review this project.</p>	<p>5-1 The level of service calculations have been modified to sum the traffic scenarios in the order requested in the letter.</p> <p>5-2 The descriptions indicated in the August 27, 1997, comment letter were subsequently revised by the County and sent to the Districts. The changes were made which were minor in nature and the less than significant impact determination did not change.</p> <p>5-3 Comment noted.</p> <p>5-4 Copies of the Draft 2015 Plan and EIR were sent to the City of Santa Clarita and CALTRANS (see Letters 4 and 6).</p>

AGENCIES	COMMENTS	RESPONSES
City of Santa Clarita Jeff Chaffin 6-Letter 8/29/97	6-1 Difference between 2015 Plan's projections and 2020 Report.	6-1 The projections used in the 2015 Plan are consistent with the growth projection contained in the 2020 Report since they were derived from the SCAG 96 projections which in turn were based on the 2020 Report.
	6-2 EIR should evaluate the recommended project based on intensity of development found in City and County General Plans.	6-2 Since the Districts' population estimates were based on the SCAG 96 projections which in turn were based on the 2020 Report, and the 2020 Report was based on intensity of development, the Districts did indirectly evaluate the recommended project based on intensity of development.
	6-3 EIR should evaluate growth potential in the eastern portion of the valley for possible location of a new WRP.	6-3 Districts staff reevaluated the possibility of locating a new WRP in the eastern valley. Even though growth projections and development information indicated sufficient flow to site a 6 mgd facility, expansion of the VWRP would still be necessary to treat the remaining flow generated in the entire valley. Additionally, analysis of the environmental impacts, system operation, and cost effectiveness reconfirmed that the recommended project is superior to siting a new WRP in the eastern valley.
	6-4 Update maps to reflect new City boundary.	6-4 Maps have been updated to indicate the current boundary of the City of Santa Clarita.
	6-5 City recommends the preservation of the railroad right-of-way for future restoration of the railroad or multi use trail.	6-5 Comment noted.
	6-6 City area is now 45 square miles.	6-6 Changes have been made to the Draft 2015 Plan and EIR to reflect comment.
	6-7 Santa Clara River is designated as an Significant Ecological Area by the City and County.	6-7 Changes have been made to the Draft 2015 Plan and EIR to reflect comment.
	6-8 City is not part of the VCOG subregion. Update SCAG's subregions including map.	6-8 SCAG's subregions have been updated to reflect the latest designations in the table and map.
	6-9 Zoning designations in the city show county designations. Update based on City's adopted zoning map.	6-9 Changes have been made to the Draft 2015 Plan and EIR to reflect comment.

AGENCIES	COMMENTS	RESPONSES
<p>City of Santa Clarita (Cont'd)</p> <p>Jeff Chaffin 6-Letter 8/29/97</p>	<p>6-10 Update list of development proposals in the transportation chapter and revise traffic impacts.</p> <p>6-11 Location of related project on map in the transportation chapter needs to be corrected.</p> <p>6-12 Correct spelling error in Figure 22-1.</p>	<p>6-10 The list of developments has been updated and the traffic analysis has been revised. The impacts remain to be less than significant.</p> <p>6-11 The location of the related project has been corrected on map.</p> <p>6-12 Spelling error in Figure 22-1 has been corrected.</p>
<p>United Water Conservation District</p> <p>Kenneth Turner 7-Letter 8/29/97</p>	<p>7-1 to 7-3 Provide information on the impact of drought conditions on water supply and effluent discharges.</p> <p>7-4 to 7-6 Clarify the methodology for future water supply estimates.</p> <p>7-7 Clarify schedule for nitrification-denitrification.</p> <p>7-8 to 7-10 Identify effect of temporary nominal WRP capacity deficiency on water quality.</p>	<p>7-1 to 7-3 The local water purveyors dictate the mix of water supply sources in response to changes in meteorological conditions. Table 26-7-1 presents the average effluent quality for a number of constituents at the two WRPs for a year representative of the drought, 1990.</p> <p>7-4 to 7-6 The methodology used by the CLWA for their future water supply estimates has been clarified including more information on the variables considered, the constraints on safe yield of the aquifers, and the use of reclaimed water.</p> <p>7-7 Figure 7-2 presents the implementation schedule for the recommended project. As shown, nitrification-denitrification facilities at both the SWRP and VWRP will be completed by mid-2003.</p> <p>7-8 to 7-10. The effect of exceeding nominal plant capacity during 1992 through 1994 on water quality was negligible. Furthermore, the Districts expect no significant water quality impacts for the short period during which the flow might exceed the WRPs' stated capacities as the capacities stated in the NPDES permits for the SWRP and VWRP are nominal and can be exceeded temporarily without permit violations.</p>

AGENCIES	COMMENTS	RESPONSES
<p>United Water Conservation District (Cont'd)</p> <p>Kenneth Turner 7-Letter 8/29/97</p>	<p>7-11 Continuous surface flow generally exists along the reach of the Santa Clara River downstream of the Los Angeles/Ventura County line during the winter months, not just during flood conditions.</p> <p>7-12 Confirm that the Castaic Creek South gauging station is still operational.</p> <p>7-13 Include a table showing percent effluent in the Santa Clara River on a monthly basis.</p> <p>7-14 The proposed Newhall Ranch Project has not identified an adequate water supply. An Aquifer Storage and Recovery (ASR) program may greatly perturb groundwater levels and induce recharge where rising water is now common.</p> <p>7-15 Discharge from the proposed Newhall Ranch WRP should be expected only in the winter.</p>	<p>7-11 The <i>Santa Clara River Water Quality Study</i> (DWR, 1968) and the <i>Unarmored Threespine Stickleback Recovery Plan</i> (USFWS, 1979) indicated that the gap in perennial flow only closed during flood events. It could not be concluded from data provided by United that there is continuous perennial surface flow along the entire gap. During a recent communication between Districts and United staff, United agreed that a gap in perennial flow generally exists along the Santa Clara River upstream of its confluence with Piru Creek.</p> <p>7-12 The Castaic Lagoon gauge (operated by the USGS) was used in the hydrologic analyses, not the Castaic Creek South gauging station (operated by the Los Angeles County Department of Public Works). Although the Castaic Creek South gauging station is still in operation, it was not used in the hydrologic analysis because of large gaps in available data, which indicate that the station has not operated continually.</p> <p>7-13 Changes have been made to the Draft 2015 Plan and EIR to reflect comment.</p> <p>7-14 The <i>Newhall Ranch Specific Plan Draft EIR</i> states that the Newhall Ranch Project will be supplied with water through CLWA and the Valencia Water Company, through the use of reclaimed water from the proposed 7.7 mgd Newhall Ranch WRP, and through the potential use of Newhall Land and Farming Company's rights to Castaic Creek's flood flows. As stated in the <i>Newhall Ranch Specific Plan Draft EIR</i>, ASR is only one available alternative for the management of available Castaic Creek flood flows, and the impacts of ASR on groundwater levels in the Alluvial and Saugus Aquifers would be less than significant.</p> <p>7-15 The Cumulative Discharge Scenario was developed to serve as a worst-case scenario in terms of greatest potential change to the existing discharge levels. Therefore, discharge levels from the Newhall Ranch WRP were not reduced by the levels of reuse assumed in the <i>Newhall Ranch Specific Plan Draft EIR</i>.</p>

AGENCIES	COMMENTS	RESPONSES
<p>United Water Conservation District (Cont'd)</p> <p>Kenneth Turner 7-Letter 8/29/97</p>	<p>7-16 Clarify discussion on the NCWD's reclaimed water system.</p>	<p>7-16 According to recent communication with the Newhall County Water District, the project is no longer viable and has been dropped. Changes have been made to the Draft 2015 Plan and EIR to reflect comment.</p>
	<p>7-17 It is inaccurate to dismiss all downstream impacts by stating that all flow percolates into the Piru Groundwater Basin.</p>	<p>7-17 All surface water percolates into the Piru basin during the dry season when water quality impacts on fisheries are potentially the greatest. During the wet season, climate moderates the effluent temperature and storm water runoff dilutes potentially toxic constituents in the effluent. Therefore, it was concluded that the area of impact would be limited to the perennial reach of the river.</p>
	<p>7-18 Flows in the Santa Clara River are highly variable from year to year and from month to month.</p>	<p>7-18 Although the wet weather flow is highly variable, the dry weather flow is fairly uniform as it is dominated by the existing SWRP and VWRP discharges. Because the water quality impacts on fisheries are potentially greatest during the dry weather season, a monthly water budget is appropriate for evaluating the effects of the proposed project and alternatives.</p>
	<p>7-19 Anticipated flows at the Los Angeles/Ventura County line gauging station should be provided, and the variability of flow between wet and dry years needs to be addressed.</p>	<p>7-19 Table D-5 of Appendix D identifies anticipated flows at the county line under each discharge scenario. Because water conservation measures typically do not reduce the types of consumption that significantly affect wastewater flow (e.g., landscape irrigation), it is expected that wet and dry year discharges will be similar. Indeed, as shown in Figure 5-4, annual wastewater flow either increased or remained constant throughout the most recent drought period.</p>
	<p>7-20 Discharge scenarios do not account for changes in the water levels of the Alluvial Aquifer.</p>	<p>7-20 The hydrological analysis in the Draft 2015 Plan and EIR did account for changes in the water levels in the Alluvial Aquifer. During the 24-year range of mean monthly flow data used to calculate discharge and recharge levels, the region experienced years of below average, average, and above average precipitation.</p>

AGENCIES	COMMENTS	RESPONSES
<p>United Water Conservation District (Cont'd)</p> <p>Kenneth Turner 7-Letter 8/29/97</p>	<p>7-21 Future groundwater extractions may significantly reduce levels of rising groundwater along the Santa Clara River and, in turn, surface flow.</p> <p>7-22 Compare effluent discharge characteristics to drinking water standards.</p> <p>7-23 Prepare for the possible requirement to reduce chloride levels appropriate for the beneficial uses of Santa Clara River Hydrologic Unit No. 403.51.</p> <p>7-24 to 7-26 Identify potential health risks of the total nitrogen content of the receiving waters.</p> <p>7-27 to 7-28 Provide further information on the groundwater sampling stations.</p>	<p>7-21 While increased groundwater extraction may lower the water table in the vicinity of the Santa Clara River and decrease surface flow, most of the extracted water would eventually be returned to the river and its underlying aquifers through discharge from the SWRP and VWRP. The potential impacts of increased groundwater extraction on surface flow would need to be considered when developing any future water supply management plans for the valley.</p> <p>7-22 See Table 26-7-2 for a comparison of selected constituent concentrations at the SWRP and VWRP with California drinking water standards (Title 22 of the California Code of Regulations) and a listing of the range of concentrations monitored for 1996.</p> <p>7-23 The current interim chloride standard is under review and the Districts will, as necessary, respond to any determinations made by the RWQCB.</p> <p>7-24 to 7-26 The total nitrogen levels observed at the different receiving water monitoring stations include nitrogen from SWRP, VWRP, and other natural and anthropogenic sources. Thus, the multiple tributary water sources into the river as well as volatilization and plant uptake result in a net loss of nitrogen in the river water. As such, the Districts consider that the health risks from total nitrogen in the river to be negligible or minor. More importantly, the nitrification-denitrification process being considered will further reduce total nitrogen levels in receiving waters. See Table 26-7-3 for maximum concentrations as well as average concentrations of relevant nitrogen compounds at each receiving water monitoring station.</p> <p>7-27 to 7-28 The locations of the groundwater sampling stations and the discharge points of the SWRP and VWRP are shown on Figure 26-7-1. Details on the depth, diameter, and screening of the wells is also provided.</p>

AGENCIES	COMMENTS	RESPONSES
<p>United Water Conservation District (Cont'd)</p> <p>Kenneth Turner 7-Letter 8/29/97</p>	<p>7-29 There is an inconsistency in the statement that the WRP discharges will impact the downstream groundwater basins.</p>	<p>7-29 Much of the Districts' effluent discharge percolates into the Piru Groundwater Basin. Thus, it is to be expected that any potential direct impacts to the Piru Basin would have the potential to also indirectly impact the downstream basins.</p>
	<p>7-30 What is the basis for the belief that trend in improving chlorides in SWP water will continue?</p>	<p>7-30 Recent improvements to the SWP (e.g., salinity control at the Sacramento Delta) due to concerns over salinity have allowed for improved water quality, including reduced chloride levels thus the Districts believe that chloride levels will continue to be low.</p>
	<p>7-31 UWCD considers recharge waters exceeding local chloride objectives to be a significant impact.</p>	<p>7-31 It is incorrect to assume or imply that the VWRP or SWRP effluent chloride concentrations directly result in the same chloride levels at the recharge basins. The water being recharged into a groundwater basin is generally not at the same chloride concentration as the water discharged from the WRPs due to the complex hydrology of the river. Instead, this water tends to be at much lower concentrations. Thus, the impact by the SWRP and VWRP's effluent chloride levels on the groundwater basins does not appear to be significant. Also, the RWQCB has recently embarked on a study to determine new chloride objectives in the Santa Clara River that will account for the hydrology of the river, the groundwater and the beneficial uses (e.g., agriculture) as they are affected by chloride discharges.</p>
	<p>7-32 Until the nitrification-denitrification process is implemented, there will be a significant impact.</p>	<p>7-32 The impacts considered in this section are the potential impacts under the recommended project, which includes nitrification-denitrification.</p>
	<p>7-33 Compare water quality of Santa Clara River in the vicinity of the SWRP and VWRP with upstream water quality.</p>	<p>7-33 The Santa Clara River is almost always dry upstream of the SWRP discharge, hence no flow is usually observed at the upstream receiving water monitoring station R-A.</p>
	<p>7-34 Will the nitrification-denitrification process be implemented during the first phase of plant expansions.</p>	<p>7-34 The schedule planned by the Districts is the most expeditious one given the constraints.</p>

AGENCIES	COMMENTS	RESPONSES
<p>United Water Conservation District (Cont'd)</p> <p>Kenneth Turner 7-Letter 8/29/97</p>	<p>7-35 It is not correct to say that the steelhead is not directly affected by WRP effluent, since continuous surface flow generally exists along the reach of the Santa Clara River downstream of the Los Angeles/Ventura County line during the winter months, not just during flood conditions.</p>	<p>7-35 The increased discharge resulting from implementing the project would not adversely affect the ability of steelhead to migrate to spawning areas in Sespe Creek. During the wet season, climatic conditions would moderate any effluent temperature effects, and storm water runoff would dilute any constituents in the effluent. There are also significant tributary inflows between the VWRP and the confluence of Sespe Creek. See response to Comment 7-11 regarding the gap in perennial flow.</p>
<p>Southern California Association of Governments</p> <p>David Stein 8-Letter 9/2/97</p>	<p>8-1 to 8-10 The 2015 Plan and EIR is consistent with or supports many of the policies in the Regional Comprehensive Plan and Guide.</p> <p>8-11 to 8-15 The 2015 Plan and EIR includes Mitigation Measure 23-10 that acknowledges the responsibility of the Districts to implement this SCAG policy.</p> <p>8-16 Districts have worked closely with SCAG in coordinating their planning for the SCVJSS with SCAG forecasts.</p> <p>8-17 SCAG is unable to make a finding that the project is consistent with the 208 Plan.</p> <p>8-18 Federal agency making a conformity determination must notify SCAG of its determination of the action.</p> <p>8-19 The 2015 Plan and EIR is consistent with or supports many of the policies in the Regional Comprehensive Plan and Guide.</p> <p>8-20 SCAG is unable to make a finding that the project is consistent with the 208 Plan.</p> <p>8-21 All mitigation measures should be monitored according to AB 3180 and reported to SCAG through the Annual Reasonable Further Progress Reports.</p>	<p>8-1 to 8-10 Comment noted.</p> <p>8-11 to 8-15 SCAG has misconstrued Mitigation Measure 23-10. Mitigation measures associated with growth is the responsibility of public agencies that have adopted such measures and not the Districts.</p> <p>8-16 Comment noted.</p> <p>8-17 Comment noted. Although the 208 Plan has not been updated since 1981, the 2015 Plan and EIR are still consistent with policies and actions proposed in the 208 Plan.</p> <p>8-18 Comment noted.</p> <p>8-19 See responses to Comments 8-1 through 8-16.</p> <p>8-20 See response to Comment 8-17.</p> <p>8-21 Districts intend to monitor the projects' mitigation measures per AB 3180. AB 3180, however, does not require the Districts to report to SCAG through the Annual Reasonable Further Progress Reports.</p>

AGENCIES	COMMENTS	RESPONSES
<p>Newhall County Water District</p> <p>Thomas Shollenberger 9-Letter 9/2/97</p>	<p>9-1 Request for a new treatment plant located in the general vicinity of Soledad Canyon Road and Sierra Highway in the eastern valley to optimize opportunities of water reclamation and avoid bypassing excess flows around the Saugus WRP.</p>	<p>9-1 See response to Comment 6-3.</p>
<p>County of Ventura, Public Works Agency, Transportation Department</p> <p>Thomas Berg 10-Letter 9/3/97</p>	<p>10-1 Did not receive a copy of the Draft 2015 Plan and EIR.</p> <p>10-2 Do not anticipate a significant impact on the Ventura County Regional Road Network. Clarify in the EIR.</p>	<p>10-1 Districts sent two copies to the County of Ventura, Resource Management Agency.</p> <p>10-2 The recommended project does not encourage additional development. Consequently it is consistent with the Ventura County General Plan Transportation Policies.</p>
<p>County of Los Angeles, Fire Department</p> <p>Michael Wilkinson 11-Letter 9/17/97</p>	<p>11-1 Project must comply with all applicable code and ordinance requirements.</p> <p>11-2 Final fire flow will be based on type and size of construction and relationship to other structures and property lines, and the type of construction used.</p> <p>11-3 Driveways minimum width of 26' to 150' of exterior walls of first stories. The minimum width of 26' shall be increased to:</p> <ul style="list-style-type: none"> ■ 28' when building is more than 3 stories, ■ 34' when parallel parking is on one side of the driveway, ■ 42' when parallel parking is on both sides of the driveway. <p>11-4 All driveways shall be labeled as "Fire Lane" on final plans.</p> <p>11-5 Additional fire life safety will be addressed at plan check and approval for tentative subdivision maps.</p> <p>11-6 Potential impacts of erosion control, water shed management, endangered species, vegetation, fuel modification for high fire severity areas, archeological and cultural resources and County Oak Tree Ordinance should be addressed.</p>	<p>11-1 The design and construction of the project will comply with all applicable code and ordinance requirements.</p> <p>11-2 Districts will comply with code requirements for fire flows for industrial uses.</p> <p>11-3 and 11-4 All on-site driveway requirements will be incorporated into the design of the project.</p> <p>11-5 Comment noted.</p> <p>11-6 The potential impacts indicated are all addressed in the EIR except for the fuel modification impact for high fire severity areas, since the project is not located in that area, and the County Oak Tree Ordinance since no oak trees will be impacted by the recommended project.</p>

AGENCIES	COMMENTS	RESPONSES
<p>California Department of Fish and Game</p> <p>Patricia Wolf 12-Letter 9/17/97</p>	<p>12-1 In light of the occurrence of two California Species of Special Concern (steelhead trout and tidewater goby), the potential for impacts to the reach of the Santa Clara River downstream of the gap in perennial flow should be addressed.</p> <p>12-2 The native species that inhabit the aquatic and riparian habitats of the Santa Clara River have adapted to and may even depend on the extremes in condition that exist in the river system.</p> <p>12-3 Edge habitat would be lost as a result of the proposed project. The unarmored threespine stickleback avoids stretches of effluent, and the stretch of effluent is likely to be extended under the Recommended Discharge Scenario. Also, potential downstream channelization by Newhall Land and Farming would likely eliminate edge habitat.</p>	<p>12-1 The steelhead and tidewater goby both occur downstream of the gap in perennial flow, located just west of the Los Angeles/Ventura County line. Although an analysis of past conditions along this downstream reach is possible, it is purely speculative to forecast rates of groundwater pumping, recharge and the interaction with rising groundwater. Regardless, all surface water percolates into the Piru Groundwater Basin during the dry season when water quality and its impacts on fisheries are expected to be greatest. During the wet season, climatic conditions would moderate any effluent temperature effects, and storm water runoff would dilute any constituents in the effluent. Therefore, it was concluded that the potential impacts to the steelhead trout and tidewater goby downstream of the gap would be avoided.</p> <p>12-2 Extreme flow conditions in the Santa Clara River would still occur regardless of which flow scenario actually transpires. The biological resources of the river system that rely on such extremes in conditions would not be adversely impacted.</p> <p>12-3 Throughout the entire range of discharge scenarios evaluated, the perennial reach of the Santa Clara River downstream of the SWRP and VWRP is not expected to change in length, and, consequently, the quantity of edge habitat would remain the same. Except during winter storms, this reach consists mostly of treated effluent. The presence of the unarmored threespine stickleback in this effluent-dominated reach raises doubt over the validity of the statement that the unarmored threespine stickleback avoids stretches of effluent. Recent field surveys conducted in 1996 and 1997 confirmed the abundance of the unarmored threespine stickleback in this reach of the Santa Clara River. Also, while moderate channelization is a component of the proposed Newhall Ranch development, the Districts are not proposing channelization as part of the proposed VWRP expansion.</p>

AGENCIES	COMMENTS	RESPONSES
<p>California Department of Fish and Game (Cont'd)</p> <p>Patricia Wolf 12-Letter 9/17/97</p>	<p>12-4 It is unclear how projected discharges for the WRPs relate to water extractions by local water purveyors, and how, in turn, these issues relate to surface flows. The most likely discharge scenario, as clearly stated in the document, is the Reduced Discharge Scenario. DFG is opposed to any reduction in discharge, because a reduction in discharge would likely cause a reduction in aquatic and riparian habitat.</p>	<p>12-4 Anticipating that at some time in the future water reuse would take place as a means to alleviate the forecasted shortage of water, the Districts evaluated a range of discharge scenarios that would address the potential impacts of the project and reuse. Aside from making reclaimed water available for reuse, the Districts have no control over present and future water supply, including groundwater extraction, and, therefore, it would be highly speculative to estimate the extent of future groundwater extraction.</p> <p>Nowhere in the Draft 2015 EIR is it stated that the Reduced Discharge Scenario is the more likely discharge scenario. Since the extent of future reuse is unknown, it would be highly speculative to state which of the discharge scenarios evaluated would most likely occur.</p> <p>The Districts do not agree with DFG's position that any reduction in discharge would cause a substantial loss of habitat. The Reduced Discharge Scenario was estimated to be the minimum flow required to support the special-status species of the Santa Clara River system. This scenario would provide for discharges greater than that occurring in the mid-1980s. According to the <i>Unarmored Threespine Stickleback Recovery Plan (Revised)</i> (USFWS, 1985), this mid-1980s discharge level supported a new population of unarmored threespine stickleback. DFG's opposition to any reduction in discharge is also in conflict with the California Water Code which states that the maximum reuse of reclaimed water is in the primary interest of the people of California. Based on a reasonable assessment of the hydrologic and biological information presented in the 2015 Plan and EIR, the Districts believe that the unarmored threespine stickleback population would be supported throughout the range of discharge scenarios evaluated (excluding the No Discharge Scenario), and that unarmored threespine stickleback population would benefit from the improved water quality associated with the addition of nitrification-denitrification facilities at the SWRP and VWRP.</p>

AGENCIES	COMMENTS	RESPONSES
<p>California Department of Fish and Game (Cont'd)</p> <p>Patricia Wolf 12-Letter 9/17/97</p>	<p>12-5 Provide more information on the design of the proposed nitrification-denitrification process, including contingency plans if it does not work as expected.</p> <p>12-6 The riparian habitat in the vicinity of the VWRP would be considered a wetland as defined in Section 2785(g) of the Fish and Game Code of California.</p> <p>12-7 The Santa Ana sucker survives in much lower densities in turbid water than in clear water.</p> <p>12-8 See previous comment regarding discharge scenarios.</p> <p>12-9 See previous comment regarding water quality.</p>	<p>12-5 Currently, the Districts are involved in full-scale operational tests at the Whittier Narrows Water Reclamation Plant in order to optimize various process design parameters. Due to the satisfactory preliminary results from the full-scale tests, the Districts fully expect to be able to successfully implement this process at the SWRP and VWRP. Therefore, no other alternatives are being considered and no potential mitigation for ammonia is deemed necessary.</p> <p>12-6 Nearly all of the high quality habitat adjacent to the VWRP has been preserved as part of a conservation easement granted to the Department of Fish and Game in 1992 by Districts Nos. 26 and 32. Construction activities would not encroach into this conservation easement. Installation of bank protection measures would impact approximately 0.4 acre of southern cottonwood/willow riparian forest located beyond the conservation easement. Although the area to be disturbed is not believed to be a wetland, due to its location on the upper terrace slopes, it is considered a valuable wildlife habitat. Consequently, a significant impact was identified, and Mitigation Measures 18-1 and 18-2 will be implemented to replace cottonwoods (at a 3:1 ratio) and revegetate disturbed areas, respectively, to insure no net loss of habitat.</p> <p>12-7 Comment noted. The Districts currently meet the RWQCB's discharge requirements for turbidity. Furthermore, since the proposed expansion facilities at the VWRP will be designed and operated in a manner similar to that of the existing facilities, the Districts will continue to meet the discharge requirements for turbidity and will not adversely impact the Santa Ana sucker.</p> <p>12-8 See response to Comment 12-4.</p> <p>12-9 See response to Comment 12-5.</p>

AGENCIES	COMMENTS	RESPONSES
<p>California Department of Fish and Game (Cont'd)</p> <p>Patricia Wolf 12-Letter 9/17/97</p>	<p>12-10 Although risk or probability of an emergency release occurrence may remain the same, the nearly threefold increase in discharge capacity of the VWRP would substantially increase the risk of a much larger release of untreated effluent.</p>	<p>12-10 Under the Recommended Project Discharge Scenario, the treatment capacity of the SCVJSS would increase from 19.1 mgd to 34.1 mgd, which is less than a twofold increase. Regardless, the size of a plant does not affect the risk of upset. The quantity and quality of the effluent will depend on what facilities are damaged and how severely. A larger plant could provide greater storage and system redundancy thus reducing the potential for release of untreated or partially treated wastewater.</p>
<p>County of Ventura, Resource Management Agency/Public Works Agency, Water Resources and Development Department</p> <p>Thomas Berg 13-Letter 9/23/97</p>	<p>13-1 The project is relevant to Ventura County since the SWRP and VWRP discharge to the Santa Clara River, which flows into and recharges the Piru Groundwater Basin. Also, during years of above-average rainfall, there could soon be continuous surface flow in the Santa Clara River from the Los Angeles/Ventura County line to the ocean.</p> <p>13-2 The proposed nitrification-denitrification process will help discourage the growth of undesirable plant species and reestablish steelhead habitat in the river.</p>	<p>13-1 The quality of the effluent will improve due to removal of ammonia through the addition of nitrification-denitrification facilities at the SWRP and VWRP. The projected increase in discharge from the WRPs to the Santa Clara River would constitute only a small percentage of the wet weather flow and will have no appreciable effect on the current wet weather flow pattern. Perennial surface flow from the Los Angeles/Ventura County line to the ocean is highly unlikely, even during years of above-average rainfall. Historically, increases in groundwater elevation resulting from above-average rainfall have reduced the length of the gap in perennial flow but have not completely closed the gap.</p> <p>13-2 The comment regarding the positive project impact of a decrease in undesirable plant species resulting from the addition of nitrification-denitrification facilities is noted. Although the effluent quality will improve, the current water quality does not appear to be a factor in the steelhead runs in the Santa Clara River, since the runs occur during high runoff periods when the effluent is substantially diluted.</p>

AGENCIES	COMMENTS	RESPONSES
	<p>13-3 The VWRP effluent chloride level is above the level where chloride-sensitive crops become impacted.</p> <p>13-4 Piru Groundwater Basin TDS levels have declined due to WRP effluent discharge flows.</p> <p>13-5 The EIR should evaluate the impact to the Piru Groundwater Basin resulting from varying WRP chloride discharges.</p>	<p>13-3 The Districts do not believe there are any significant impacts to the Piru Basin as a result of the SWRP and VWRP effluent discharge, including any impact from chloride discharge. The water being recharged into a groundwater basin generally is at much lower chloride concentrations as compared to the discharge from the WRP's due to mixing with other sources and the complex hydrology of the river. It is also incorrect, or at least premature, to assume that at a chloride concentration of 100 mg/l there will be a detrimental impact on agriculture provided that proper irrigation practices are followed. A more conclusive determination of the effect of the different water sources on groundwater and surface waters will be obtained through the 3-year chloride study recently initiated by the RWQCB.</p> <p>13-4 Comment noted.</p> <p>13-5 See response to Comment 13-3.</p>
<p>United States Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service</p> <p>William T. Hogarth 14-Letter 9/17/97</p>	<p>14-1 The project is located within the Evolutionary Significant Unit for the federally proposed endangered steelhead.</p> <p>14-2 The project is not likely to adversely affect steelhead. No additional consultation is required under Section 7 of the Federal Endangered Species Act.</p>	<p>14-1 Comment noted.</p> <p>14-2 Comment noted.</p>

AGENCIES	COMMENTS	RESPONSES
<p data-bbox="163 212 359 321">United States Department of the Interior, Fish and Wildlife Service</p> <p data-bbox="163 354 327 431">Diane K. Noda 15-Letter 9/14/97</p>	<p data-bbox="443 212 1184 293">15-1 The Draft 2015 EIR does not provide an effective comparison between pre-development conditions and the cumulative effects of the proposed project.</p> <p data-bbox="443 380 1184 461">15-2 A clear understanding of the relationship between groundwater extractions and treatment plant discharge is essential to evaluating effects to native habitats in the river.</p> <p data-bbox="443 711 1184 899">15-3 Continuous low flow in the Santa Clara River could result in the partially armored threespine stickleback moving into the reach that supports the unarmored threespine stickleback, a federally listed endangered species. It is not clear to the Service how the conclusion was reached that continuous flow in the river below the Los Angeles/Ventura County line is unlikely except under flood conditions.</p> <p data-bbox="443 987 1184 1122">15-4 Currently, the flows present during much of the year produce habitat conditions preferred by the unarmored threespine stickleback. The Draft 2015 EIR should more clearly explain how hypothetical discharge volumes were converted to river conditions.</p>	<p data-bbox="1205 212 1932 354">15-1 Under Section 15125 of the state CEQA guidelines, the Districts are required to describe the environment in the vicinity of the project as it exists before commencement of the project as a basis for impact analysis. Comparison of the project to pre-development conditions was not intended by CEQA.</p> <p data-bbox="1205 380 1932 683">15-2 The evaluation of the relationship between habitat values and future groundwater extraction, surface water importation, and wastewater reuse (activities which are beyond the control of the Districts) would be speculative. Instead, the Districts evaluated a range of discharge scenarios that would address the potential impacts of the project and reuse. Based on a reasonable assessment of the hydrologic and biological information presented in the 2015 Plan and EIR, the Districts believe that the native habitats would be supported throughout the range of discharge scenarios evaluated, excluding the No Discharge Scenario.</p> <p data-bbox="1205 711 1932 959">15-3 The length of gap in perennial flow varies from year to year based on precipitation and operation of the various water projects tributary to the river. However, continuous flow does not occur in the Santa Clara River except under flood conditions. The cumulative discharge of the Districts' project and the Newhall Ranch project would contribute insignificantly to the annual flood flows. Therefore, there would be no continuous sustained low flow to allow for upstream migration of the partially armored threespine stickleback.</p> <p data-bbox="1205 987 1932 1398">15-4 As described in Chapter 16, it was assumed that the channel-forming flood flows, bed materials, and the gradient of the river would not be changed by the project. Consequently, the channel depth to width ratio, which depends heavily on the bed material and channel slope, would remain nearly constant. Manning's equation was used to estimate the normal depth and mean velocity of the resultant channel. Because changes in discharge would occur gradually over time and because the low-flow channel is altered annually in response to flood flows, it is unlikely that the project would cause any significant change in channel form that may result in habitat loss. While the size of the low-flow channel would change as a result of a change in base flows, the river will still have of the shallow, slow flowing, edge habitat and pools preferred by the unarmored threespine stickleback.</p>

AGENCIES	COMMENTS	RESPONSES
<p>United States Department of the Interior, Fish and Wildlife Service</p> <p>Diane K. Noda 15-Letter 9/14/97</p>	<p>15-5 The Draft 2015 EIR should reflect the listing of the southern steelhead as endangered.</p> <p>15-6 If the increase in flow volumes discussed do indeed increase the velocity and depth of flow as described, the unarmored threespine stickleback could be adversely affected.</p> <p>15-7 Construction activities associated with the expansion and upgrade of the VWRP are unlikely to adversely affect listed species. However, the operation of the expanded VWRP may adversely affect the unarmored threespine stickleback and least Bell's vireo. The Districts may need to prepare a habitat conservation plan and apply for an incidental take permit pursuant to Section 10(a)(1)(B) of the Federal Endangered Species Act.</p>	<p>15-5 The Draft 2015 EIR identified the potential listing of southern steelhead as endangered under the Federal Endangered Species Act of 1973. Since preparation of the Draft 2015 EIR, however, the National Marine Fisheries Service (NMFS) has in fact listed the southern steelhead as endangered (62 FR 43937, August 18, 1997).</p> <p>15-6 See response to Comment 15-4.</p> <p>15-7 The Districts disagree with the Service's conclusion that operation of the VWRP may adversely affect the unarmored threespine stickleback and least Bell's vireo. As described in Chapters 16 and 18 and discussed in the response to Comment 15-4, the Districts believe that the proposed change in discharge would not adversely impact the special-status fish or alter the species composition of the riparian forest. The Districts will continue to informally consult with the Service and, if required, will prepare a habitat conservation plan and apply for an incidental take permit.</p>
<p>Santa Clarita Organization for Planning the Environment</p> <p>Michael Kotch Testimony at Public Hearing 8/27/97</p>	<ul style="list-style-type: none"> ■ SCAG's projections not consistent with city and county's projections; therefore, project is growth inducing. ■ Alternatives in the 2015 Plan should have considered expanding the SWRP or providing facilities upstream of the SWRP for potential water reuse and accommodating future growth in the eastern part of the valley. 	<ul style="list-style-type: none"> ■ See responses to Comments 6-1 and 6-2. ■ See response to Comment 6-3.
<p>South Coast Air Quality Management District</p> <p>Tara Tisopolous Telephone Conversation 8/26/97</p>	<ul style="list-style-type: none"> ■ No comments on Draft 2015 Plan and EIR. 	<ul style="list-style-type: none"> ■ Comment noted.