



## CHAPTER 26

---

---

### RESPONSE TO COMMENTS

Response to Written Comments  
Response to Oral Comments

## Response to Written Comments

Fifteen agencies submitted written comments on the Draft 2015 Plan and EIR. Comments from some of the agencies arrived after the 45-day review period, which ended on September 3, 1997. However, all written comments have been responded to and appropriate changes have been made to the 2015 Plan and EIR. The commenting agencies and the respective dates of their letters are listed below. The comments and responses are included in this chapter.

**Table 26-1  
AGENCIES COMMENTING IN WRITING**

<b>LETTER NUMBER</b>	<b>AGENCY</b>	<b>DATE</b>
Letter 1	County of Los Angeles, Department of Public Works, Water Works and Sewer Maintenance Division	July 17, 1997
Letter 2	California EPA/State Water Resources Control Board, Division of Clean Water Programs	August 11, 1997
Letter 3	California EPA/State Water Resources Control Board, Division of Clean Water Programs	August 14, 1997
Letter 4	California Department of Transportation (CALTRANS)	August 19, 1997
Letter 5	County of Los Angeles, Department of Public Works, Planning Division	August 27, 1997
Letter 6	City of Santa Clarita	August 29, 1997
Letter 7	United Water Conservation District	August 29, 1997
Letter 8	Southern California Association of Governments	September 2, 1997
Letter 9	Newhall County Water District	September 2, 1997
Letter 10	County of Ventura, Resource Management Agency/Public Works Agency, Transportation Department	September 3, 1997
Letter 11	County of Los Angeles, Fire Department	September 17, 1997
Letter 12	California Department of Fish and Game	September 17, 1997
Letter 13	County of Ventura, Resource Management Agency/Public Works Agency, Water Resources and Development Department	September 23, 1997
Letter 14	United States Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service	September 17, 1997
Letter 15	United States Department of the Interior, Fish and Wildlife Service	November 14, 1997

Letter 1



HARRY W. STONE, Director

**COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS**

900 SOUTH FLEMING AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-5100

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE W-9

July 17, 1997

Mr. Charles W. Carry  
Chief Engineer and General Manager  
County Sanitation Districts of Los Angeles County  
1955 Workman Mill Road  
Whittier, CA 90601-1400

Attention Habib Kharrat

Dear Mr. Carry:

REVIEW OF ENVIRONMENTAL DOCUMENTS  
DRAFT 2015 SANTA CLARITA VALLEY JOINT SEWERAGE SYSTEM  
FACILITIES PLAN AND  
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

As requested, we have reviewed the DEIR for the proposed project | 1-1  
and have no comments to offer.

Thank you for the opportunity to comment on this project. If you  
have any questions, please contact Mr. Norman Cortez at  
(626) 458-7188.

Very truly yours,

HARRY W. STONE  
Director of Public Works

*Brian S. Hayes*  
for DEAN D. EFSTATHIOU  
Assistant Deputy Director  
Waterworks and Sewer Maintenance Division

NC:pf  
W-9\SM7499

97 JUL 24 10:19

**Response to Comments From County of Los Angeles, Department of Public Works,  
Water Works and Sewer Maintenance Division**

---

**1-1** Comment noted.

No changes have been made to the Draft 2015 Plan and EIR.

Letter 2



AUG 11 1997

Cal/EPA

State Water Resources Control Board

Division of Clean Water Programs

Mailing Address: P.O. Box 944212 Sacramento, CA 94244-2120

2014 T Street, Suite 130 Sacramento, CA 95814 (916) 227-4400 FAX (916) 227-4349

Mr. Charles W. Carry Chief Engineer and General Manager County Sanitation Districts of Los Angeles County 1955 Workman Mill Road Whittier, CA 90601-1400

Dear Mr. Carry:

COMMENTS ON THE DRAFT SANTA CLARITA VALLEY JOINT SEWERAGE SYSTEM FACILITIES PLAN AND EIR; COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY (DISTRICTS), STATE REVOLVING FUND (SRF) LOAN PROJECT C-06-4082-020

The Division of Clean Water Programs (Division) is in receipt of the subject draft document. The Districts are proposing a two stage capacity expansion at the Valencia Water Reclamation Plant, and upgrades for nitrification and denitrification at both the Valencia and Saugus Water Reclamation Plants.

Please provide the following so that we can proceed to facility plan approval:

- 1. NPDES and Water Reuse Permits for both treatment plants;
2. The water conservation program, the Urban Water Management Plan adopted by the water purveyors, and the conservation ordinances adopted by the City of Santa Clarita and Los Angeles County. In lieu of the preceding, the District's can certify that 75 percent of the users in Districts Nos. 26 and 32 are signatory to the State Memorandum of Understanding, or provide a schedule for compliance with the SRF Policy's water conservation requirement. It is unclear from the information in Appendix A whether the requirements are met;
3. An updated draft revenue program. Our records show the last update was in 1992 for the Valencia Stage IV Solids Facilities project;
4. The number of SRF loans and/or construction contracts that the Districts plan to request for the four stages of the project and schedules for inclusion in the facility plan approval letter and the SWRCB agenda item. It is preferable to request SWRCB funding commitment once for all components of the recommended project. In order to facilitate the flow of money and best meet the District's cash flow needs, it appears from Figure 7-2 that both upgrades would be under one loan contract and the Stage V and VI expansions would each have a loan contract;

Comments:

- 1. Table 5-3 gives influent TSS and BOD loadings of 353 and 253 mg/l, respectively. Table 7-1 gives design influent loadings of 400 and 300 mg/l, respectively. Both are high when compared to typical average strength loadings of 200 - 225 mg/l for a service area per capita flow of 101 GPCD (Table 5-9). Please provide at least a calendar year of flow data to support the your influent organic loadings;



Pete Wilson Governor

1997 AUG 15 PM 3:20

2-1

2-2

AUG 11 1997

Mr. Charles W. Carry

-2-

- 2. The SRF Policy allows 12 years of reserve capacity from the date of the facility plan approval. According to Table 5-10 and Figure 5-4, the estimated flow for the year 2009 is 27.0 MGD, or about 8 of the planned 9 MGD Stage V expansion on the south site. Components of the north site expansion may be eligible if they are necessary to accommodate increased flows up to the allowable 27.0 MGD; and
3. Design peaking factors 2.0 sanitary and 2.25 storm are high when considering the information contained in Tables 5-8 and 5-9, and in the text on page 5-12. Please indicate the basis for your design peaking factors.

If you have any questions, please do not hesitate to call me at (916) 227-4575.

Sincerely,

Daniel J. Little, P.E. Associate WRC Engineer

cc: Mr. John Lewis, Environmental Specialist Los Angeles Regional Water Quality Control Board 101 Centre Plaza Drive Monterey Park, CA 91754-2156

Mr. James C. Gratteau, Head Financial Management and Grants Administration Department County Sanitation Districts of Los Angeles County P.O. Box 4998 Whittier, CA 90607-4998



Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.



Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.

**Response to Comments From California EPA / State Water Resources Control Board,  
Division of Clean Water Programs**

---

2-1 The requested information items 1 through 4, were mailed to Mr. Daniel Little of the State Water Resources Control Board, on September 17, 1997.

No changes have been made to the Draft 2015 Plan and EIR.

2-2 As noted in the comment, the referenced values for the VWRP influent TSS and BOD loadings are relatively high when compared to a typical plant. However, the VWRP treats all the solids from the SCVJSS service area, thus the design loadings are higher for the following reasons:

- *Interconnection of the VWRP and SWRP:* All solids (sludge and skimmings) removed from the primary sedimentation tanks at the SWRP are routed to the District No. 26 Interceptor for conveyance to the VWRP headworks. Therefore, these solids contribute to the elevated influent TSS and BOD concentrations of the VWRP influent.
- *Treatment Processes at the VWRP:* The VWRP treatment process includes dissolved air flotation and solids dewatering. The underflows of these processes (DAF supernatant and filter press filtrate), which are high in TSS and BOD, are returned to the head end of the treatment train and mixed with the incoming influent, and thus also contribute to the observed high influent TSS and BOD.

Table 26-2-1 and Figure 26-2-1 present monthly average values of influent TSS and BOD concentrations for the VWRP for 1996. The relatively higher values for TSS and BOD in late 1996 are due to annual maintenance at the VWRP. Each year, a digester is temporarily taken out of service for cleaning. The wash water, which has a high solids content, is returned to the head end of the treatment train resulting in higher influent TSS and BOD concentrations.

**Table 26-2-1  
1996 VWRP INFLUENT BOD AND TSS LOADINGS**

	Influent BOD [mg/l]	Influent TSS [mg/l]
January	220	323
February	217	331
March	218	278
April	263	334
May	233	310
June	226	367
July	231	328
August	256	295
September	278	370
October	320	526
November	339	415
December	232	355
<b>1996 Average</b>	<b>253</b>	<b>353</b>

No changes have been made to the Draft 2015 Plan and EIR.

2-3 The SRF Policy allows 12 years of reserve capacity from the estimated date of start of construction. Construction of Stage V is estimated to begin in July of 1999. Twelve years from that date would be July of 2011. According to Figure 5-4 the estimated flow in 2011 would be approximately 29 mgd. Stage V will provide treatment capacity up to 27.7 mgd which is less than the eligible reserve capacity of 29 mgd.

Construction of Stage VI is anticipated to begin in July of 2007, and twelve years from that date would be July of 2019. Since Stage VI will provide treatment capacity up to 34.1 mgd which would be reached in 2015 (four years prior to 2019), the capacity provided by the Stage VI expansion is also considered eligible.

No changes have been made to the Draft 2015 Plan and EIR.

2-4 The design peaking factors presented were originally developed in the mid-1980's during preparation for the VWRP Stage IV Expansion. A recent analysis was conducted to verify the continued validity of these factors. The methodology used was as follows:

The analysis focused on the years 1990 through 1995, the last six years for which complete data was available. The peak to average flow analysis was conducted using the historical conditions witnessed only at the VWRP. The SWRP was excluded from this analysis since its peak to average flow conditions are influenced by its interconnection with the downstream VWRP (i.e. during periods of high flow, the Districts can bypass a portion of the SWRP flow to the VWRP).

To determine a representative average flow, an average annual dry weather flow was calculated by averaging the flow during the months of April to September for each year. This method was used because the average flow during these months more closely approximates the true average wastewater flow by excluding rain induced inflow/infiltration potentially occurring during the balance of the months.

#### **Sanitary Peaking Factor**

A monthly peak sanitary to average flow peaking factor was calculated by using the average peak flow for the dry months and the calculated annual dry weather average flow, as follows:

$$\text{Sanitary Peaking Factor} = \frac{\text{Monthly Average Peak Flow [mgd]}}{\text{Annual Dry Weather Average Flow [mgd]}}$$

Notes: 1) The Sanitary Peaking Factor was only calculated for the dry weather months (April-September).  
2) The Annual Dry Weather Flow is the average flow for the months April-September.

Thus, a monthly sanitary peaking factor was developed for each dry weather month for the 1990-95 period. As a result 36 separate sanitary peaking factors were obtained. The values ranged from a low of 1.49 to a high of 2.54, with an average value of 1.89. A percentage ranking of all the 36 values revealed that the design sanitary peaking factor of 2.00 would be at approximately the 70th percentile, revealing that over 30% of the individual sanitary peaking factor values would be expected to be greater than 2.00. Therefore,

the design sanitary peaking factor assumed for the 2015 Plan and EIR is still considered an appropriate value for designing facilities at the VWRP.

### **Storm Peaking Factor**

A monthly peak storm to average flow peaking factor was calculated by using the maximum peak flow for the wet months and the calculated annual dry weather average flow, as follows:

$$\text{Storm Peaking Factor} = \frac{\text{Monthly Maximum Peak Flow [mgd]}}{\text{Annual Dry Weather Average Flow [mgd]}}$$

- Notes: 1) *The Storm Peaking Factor was only calculated for the wet weather months (October-March).*  
2) *The Annual Dry Weather Flow is the average flow for the months April-September.*

Thus, a monthly storm peaking factor was developed for each wet weather month for the 1990-95 period. As a result 36 separate storm peaking factors were obtained. The values ranged from a low of 1.71 to a high of 2.50, with an average value of 2.08. A percentage ranking of all the 36 values revealed that the design storm peaking factor of 2.25 would be at approximately the 80th percentile, revealing that over 20% of the individual storm peaking factor values would be expected to be greater than 2.25. Therefore, the assumed storm peaking factor of 2.25 is considered an appropriate value for designing the tankage for the VWRP expansions, however, all pumping facilities will be sized to accommodate the total flow.

No changes have been made to the Draft 2015 Plan and EIR.



Letter 3



Ca/EPA

State Water Resources Control Board

Division of Clean Water Programs

Mailing Address: P.O. Box 944212 Sacramento, CA 94244-2120

2014 T Street, Suite 130 Sacramento, CA 95814 (916) 227-4400 FAX (916) 227-4349

AUG 14 1997

Mr. Charles W. Carry Chief Engineer and General Manager County Sanitation Districts of Los Angeles County 1955 Workman Mill Road Whittier, CA 90601-1400

Dear Mr. Carry:

ENVIRONMENTAL IMPACT REPORT (EIR) FOR DRAFT 2015 SANTA CLARITA VALLEY JOINT SEWERAGE SYSTEM FACILITIES PLAN - STATE REVOLVING FUND LOAN NO. C-06- C-06-4082-120 (SCH# 96041084)

Thank you for the opportunity to review the above document. We understand that Districts Nos. 26 and 32 will be seeking a State Revolving Fund (SRF) Loan from the State Water Resources Control Board (SWRCB), Division of Clean Water Programs (Division).

As a funding agency, the SWRCB will be a responsible agency pursuant to the California Environmental Quality Act (CEQA) and must consider the information in the Final EIR prepared for the project when deciding whether to approve a loan for the project. Please send (1) two copies of the Final EIR with comments and responses; (2) the resolution certifying the EIR, adopting the mitigation measures, and making CEQA findings, and (3) the Notice of Determination filed with the Governor's Office of Planning and Research when they become available. In addition, we would appreciate notices of any meetings or hearings scheduled regarding the document and project approval.

For SRF loans, we are required to consult directly with agencies responsible for implementing federal environmental laws and regulations. Accordingly on August 7, 1997, Division staff circulated copies of the EIR to the U.S. Environmental Protection Agency, the Army Corps of Engineers, the Federal Emergency Management Agency, the U.S. Fish and Wildlife Service, the National Marine Fisheries Service and the U.S.D.A Natural Resources Conservation Service. The Federal review period will expire on September 29, 1997.

In addition, while CEQA itself does not require formal public hearings during the environmental review process, at least one public hearing is required for an SRF loan project. The Public Notice needs to be distributed at least 30 days in advance or 14 days in advance if a notice of availability was distributed 30 days in advance. Copies of the notices need to be sent to us.

In general, the EIR will be adequate for our consideration. The LACSD will need to adopt a statement of overriding considerations for the unavoidable significant impacts identified for the project.



Pete Wilson Governor

AUG 14 1997

Mr. Charles W. Carry

-2-

Please call me at (916) 227-4480 if you have any questions regarding our environmental review of this project.

Sincerely,

Handwritten signature of Wayne Hubbard

Wayne Hubbard Environmental Services Unit

cc: State Clearinghouse 1400 Tenth Street Sacramento, CA 95814

Mr. John Lewis Los Angeles Regional Water Quality Control Board 101 Centre Plaza Drive Monterey Park, CA 91754-2156

Mr. Habib Kharrat County Sanitation Districts of Los Angeles County

3-1

3-2

3-3

3-4



## **Response to Comments From California EPA/State Water Resources Control Board, Division of Clean Water Programs**

---

**3-1** Comment noted. The following will be sent to the SWRCB:

- Two copies of the Final EIR with comments and responses.
- The resolution certifying the EIR, adopting mitigation measures, and making CEQA findings.
- The Notice of Determination filed with the Governor's Office of Planning and Research.
- Notices of any meetings or hearings scheduled regarding the document and project approval.

No changes have been made to the Draft 2015 Plan and EIR.

**3-2** Comment noted. The Districts will be accepting comments from federal agencies until September 29, 1997.

No changes have been made to the Draft 2015 Plan and EIR.

**3-3** A public Hearing on the Draft 2015 Plan and EIR was held at the City of Santa Clarita Council Chambers on August 27, 1997. A legal public notice was published in *The Signal* (a newspaper of general circulation, printed and published daily in the City of Santa Clarita) on July 28, 1997, 30 days prior to the Public Hearing. In addition, a display ad was published in the August 1997 issue of *The Santa Clarita Magazine*, a monthly publication circulated free of charge to every resident in the Santa Clarita Valley. Also a flyer was mailed on August 11, 1997 to all recipients of the Draft 2015 Plan and EIR as a reminder of the Public Hearing. Copies of the above were mailed to Mr. Wayne Hubbard of the State Water Resources Control Board on August 26, 1997 as part of the response to this comment.

No changes have been made to the Draft 2015 Plan and EIR.

**3-4** Comment noted. The Districts will adopt a Statement of Overriding Considerations for the unavoidable significant impacts identified for the project.

No changes have been made to the Draft 2015 Plan and EIR.

Letter 4

STATE OF CALIFORNIA—BUSINESS AND TRANSPORTATION AGENCY

PETE WILSON, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, 170 SO. SPRING ST.  
LOS ANGELES, CA 90012-3606  
TDD (213) 897-4610



August 19, 1997

IGR/CEQA cs/970746  
North Los Angeles County  
2015 Santa Clarita Valley  
Joint Sewer System  
Vic. LA-5/126-VAR  
SCH# 96041084

1997 AUG 26 AM 8 37

Mr. Habib Kharrat  
County of Los Angeles  
Sanitation District, Nos. 26 & 32  
1955 Workman Mill Rd.  
Whittier, CA 90601

Dear Mr. Kharrat:

Thank you for including Caltrans in the environmental review process for the above-mentioned project. Based on the information received, we have no comments at this time other than:

Any construction related work which may occur within or adjacent to State right-of-way may need an Encroachment Permit. Also, we recommend that truck trips be limited to off-peak commute period.

4-1

If you have any questions regarding our response, refer to Caltrans IGR/CEQA Record# 970746, and please do not hesitate to contact me at (213) 897-4429.

Sincerely,

  
STEPHEN BUSWELL  
IGR/CEQA Program Manager

cc: Mr. Chris Belsky, State Clearinghouse

## Response to Comments From California Department of Transportation (CALTRANS)

- 4-1** Comment noted. At the time of construction, all necessary permits including encroachment permits will be secured. Based on the traffic analysis outlined in Chapter 12 of the 2015 Plan EIR, it was determined that the impact due to truck trips during peak commute periods occurring from the construction or operation of the recommended project is less than significant.

No changes have been made to the Draft 2015 Plan and EIR.

Letter 5



COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-1100

HARRY W. STONE, Director

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

August 27, 1997

Mr. Charles W. Carry  
Chief Engineer and General Manager  
County Sanitation Districts  
of Los Angeles County  
1955 Workman Mill Road  
Whittier, CA 90601-1400

Dear Mr. Carry:

**RESPONSE TO A DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) -  
DRAFT 2015 SANTA CLARITA VALLEY  
JOINT SEWERAGE SYSTEM FACILITIES PLAN**

Thank you for the opportunity to provide comments on the DEIR for the proposed Public Review of the Draft 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan and DEIR. We have reviewed the DEIR and offer the following comments:

Traffic and Lighting

We recommend the traffic study be revised to include the following:

- The level of service (LOS) calculations should be conducted in the order of the following traffic scenarios. A copy of our Traffic Impact Analysis Guidelines is enclosed.
  - (a) Existing
  - (b) Existing plus ambient growth of the area
  - (c) Traffic in (b) plus project traffic
  - (d) Traffic in (c) plus other related projects traffic
- The existing lane configurations for the following intersections should be corrected as follows:

The Old Road and Magic Mountain Parkway

North approach - One left-turn, one shared through/left-turn, and one exclusive right-turn lane.

South approach - One left-turn, one shared through/left-turn, and one shared through/right-turn lane.

I-5 Freeway Southbound Ramps and Magic Mountain Parkway

West approach - Two through lanes and one exclusive right-turn lane.

Mr. Charles W. Carry  
August 27, 1997  
Page 2

I-5 Freeway Northbound Ramps and Magic Mountain Parkway

West approach - One left-turn lane, two through lanes, and one exclusive right-turn lane.

A Congestion Management Program (CMP) analysis has been performed. We agree with the study that the project will not have any impact to the CMP roads or intersections.

We recommend the City of Santa Clarita and the State of California Department of Transportation also review this project for impacts/mitigations within their jurisdictions.

If you have any questions regarding the above comments, please contact Mr. Garland Seto of our Traffic and Lighting Division of this Department at (626) 458-5909.

If you have any questions regarding the environmental reviewing process of this Department, please contact Mr. Vik Bapna at the address on the first page or at (626) 458-4363.

Very truly yours,

HARRY W. STONE  
Director of Public Works

DAVID YAMAHARA  
Assistant Deputy Director  
Planning Division

YC:km  
26

Enc.

IN REPLY PLEASE REFER TO FILE. P-2  
097 SEP -2 AM 04

5-2

5-3

5-4

5-1

5-2

## Response to Comments From County of Los Angeles, Department of Public Works, Planning Division

---

- 5-1 The level of service calculations have been modified to sum the traffic scenarios in the order requested in the letter. The respective changes have been made to the *Traffic Impact Study, 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan EIR* (County Sanitation Districts of Los Angeles County, 1997) as requested in the letter. A revised copy of the study will be submitted to the County Department of Public Works along with the Final 2015 Plan EIR. The revisions did not alter the project impact and, therefore, the impact remains less than significant. The Draft 2015 Plan and EIR have been changed as follows:

Page 12-9, first column, first paragraph:

The ICU method was utilized to determine impact of construction related traffic on the local roadways and intersections. Both Stage V and Stage VI construction activities were considered. Stage V construction traffic was added to the 2002 background volumes while Stage VI construction traffic was added to the 2010 background volumes. The results of the ICU analysis are shown in Table 12-3. The impacts were evaluated with and without related projects as background traffic and are shown in the traffic impact study.

Page 12-9, second column, last paragraph:

Since the increase in the V/C ratio by the project-related traffic is less than 0.01 at the five key intersections, as shown in Table 12-5 (for 2002) and Table 12-6 (for 2010 and 2015), the project's impact is considered less than significant. Note that 2002 conditions include Stage V project completion while 2010 conditions include Stage VI project completion. The 2015 conditions include a traffic scenario with the proposed implementation of the 2015 Plan. The project impacts were evaluated with and without related projects in all traffic scenarios in order to comply with the County's Traffic Impact Analysis Guidelines.

- 5-2 The descriptions of existing lane configurations for the intersections indicated in the August 27, 1997 comment letter were subsequently revised by the County and the corrections faxed to the Districts' consultant. The revised configurations are as follows (italics indicate the change in lane configuration to the figures in the Draft 2015 Plan and EIR discussed below):

■ **The Old Road and Magic Mountain Parkway:**

North approach - One left-turn lane, one shared through/left-turn lane, one shared through/right-turn lane.

*East approach - One left-turn lane, one through lane, one shared through/right-turn lane, one exclusive right-turn lane.*

South approach - One left-turn lane, one shared through/left-turn lane, one right turn lane.

West approach - One left-turn lane, two through lanes, and one exclusive right-turn lane.

■ **I-5 Freeway Northbound On-Off Ramps and Magic Mountain Parkway:**

*East approach - One left-turn lane, two through lanes, one exclusive right-turn lane.*

South approach - One left-turn lane, one shared through/left-turn/right-turn lane.

*West approach - One left-turn lane, two through lanes, one exclusive right-turn lane.*

■ **I-5 Freeway Southbound On-Off Ramps and Magic Mountain Parkway:**

*North approach - One shared through/left-turn lane and one right-turn lane.*

East approach - One left-turn lane and three through lanes.

*West approach - Two through lanes and one exclusive right-turn lane.*

Changes in the lane configurations based on the above information were made to the traffic impact study and the Draft 2015 Plan and EIR. Figure 12-1 and Tables 12-3, 12-5, and 12-6, were revised in the Draft EIR to reflect the above changes. All changes to Tables 12-3, 12-5, and 12-6 are shown below at the end of the responses to this letter and include changes due to revisions in the related project list discussed in Letter No. 6. These changes were minor in nature and the impact is considered to be less than significant.

5-3 Comment noted.

No changes have been made to the Draft 2015 Plan and EIR.

5-4 Both the City of Santa Clarita and the State of California Department of Transportation have reviewed the Draft 2015 Plan and EIR and their comments and respective responses are included in this chapter (Letters Nos. 6 and 4, respectively).

No changes have been made to the Draft 2015 Plan and EIR.

**Table 12-3**  
**INTERSECTION CAPACITY AND LOS (DURING CONSTRUCTION)**

INTERSECTION	PEAK HOUR	2002 W/ CONST. TRAFFIC		CONST. IMPACT <sup>a</sup>	2010 W/ CONST. TRAFFIC		CONST. IMPACT <sup>b</sup>
		V/C	LOS	±V/C	V/C	LOS	±V/C
The Old Road @ I-5 Southbound Ramp	AM	0.50316	A	0.004	0.51324	A	0.004
	PM	1.36171	F	0.0056	1.406	F	0.006
The Old Road @ Rye Canyon Road	AM	0.73750	C	0.000	0.7629	C	0.000
	PM	1.187201	F	0.001	1.22431	F	0.001
The Old Road @ Magic Mountain Pkwy	AM	0.556681	AB	0.000	0.597689	AB	0.000
	PM	1.3406	F	0.005	1.369	F	0.005
Magic Mountain Pkwy @ I-5 Southbound Ramp	AM	0.90720	E	0.000	0.93045	E	0.000
	PM	0.77484	C	0.001	0.7928	C	0.001
Magic Mountain Pkwy @ I-5 Northbound Ramp	AM	1.13847	F	0.006	1.181	F	0.006
	PM	1.07197	F	0.000	1.14029	F	0.000

- Notes: a) Construction impact is measured in terms of V/C ratio and is calculated as the difference between the 2002 "with construction traffic" V/C ratio and the 2002 "without project" V/C ratio (Table 12-5).  
 b) Construction impact is measured in terms of V/C ratio and is calculated as the difference between the 2010 "with construction traffic" V/C ratio and the 2010 "without project" V/C ratio (Table 12-6).

**Table 12-5**  
**INTERSECTION CAPACITY AND LOS (1996 AND 2002)**

INTERSECTION	PEAK HOUR	EXISTING 1996 TRAFFIC		FUTURE 2002 W/O PROJECT		FUTURE 2002 W/ PROJECT		PROJECT IMPACT <sup>a</sup>
		V/C	LOS	V/C	LOS	V/C	LOS	±V/C
The Old Road @ I-5 Southbound Ramp	AM	0.294	A	0.499 0.512	A	0.504 0.517	A	0.005
	PM	0.962	E	1.356 1.365	F	1.360 1.369	F	0.004
The Old Road @ Rye Canyon Road	AM	0.437	A	0.737 0.750	C	0.737 0.750	C	0.000
	PM	0.815	D	1.186 1.200	F	1.188 1.202	F	0.002
The Old Road @ Magic Mountain Pkwy	AM	0.3618 5	A	0.556 0.681	AB	0.557 0.682	AB	0.001
	PM	0.666	B	1.335 1.341	F	1.339 1.345	F	0.004
Magic Mountain Pkwy @ I-5 Southbound Ramp	AM	0.7562	C	0.907 0.920	E	0.908 0.920	E	0.0040
	PM	0.489	A	0.773 0.783	C	0.774 0.784	C	0.001
Magic Mountain Pkwy @ I-5 Northbound Ramp	AM	0.921	E	1.132 1.141	F	1.136 1.145	F	0.004
	PM	0.872	D	1.071 1.097	F	1.071 1.097	F	0.000

- Note: a) Project impact is measured in terms of V/C ratio and is calculated as the difference between the 2002 "with project" V/C ratio and the 2002 "without project" V/C ratio.



**Table 12-6  
INTERSECTION CAPACITY AND LOS (2010 AND 2015)**

INTERSECTION	PEAK HOUR	FUTURE 2010 W/O PROJECT		FUTURE 2010 W/ PROJECT		FUTURE 2015 W/ PROJECT		PROJECT IMPACT <sup>a</sup>
		V/C	LOS	V/C	LOS	V/C	LOS	±V/C
The Old Road @ I-5 Southbound Ramp	AM	0.50929	A	0.54425	A	0.52233	A	0.005
	PM	1.400	F	1.405	F	1.438	F	0.005
The Old Road @ Rye Canyon Road	AM	0.7629	C	0.7629	C	0.7848	C	0.000
	PM	1.22330	F	1.22633	F	1.25481	F	0.003
The Old Road @ Magic Mountain Pkwy	AM	0.597 0.689	AB	0.599 0.691	AB	0.605 0.699	AB	0.0023
	PM	1.364	F	1.369	F	1.391	F	0.005
Magic Mountain Pkwy @ I-5 Southbound Ramp	AM	0.93945	E	0.93945	E	0.9639	E	0.0040
	PM	0.7947	C	0.7928	C	0.80612	D	0.0021
Magic Mountain Pkwy @ I-5 Northbound Ramp	AM	1.175	F	1.180	F	1.212	F	0.005
	PM	1.14029	F	1.14029	F	1.14159	F	0.000

Note: a) Project impact is measured in terms of V/C ratio and is calculated as the difference between the 2010 "with project" V/C ratio and the 2010 "without project" V/C ratio.

Letter 6

23920 Valencia Blvd. Phone  
Suite 300 (805) 259-2489  
Santa Clarita Fax  
California 91355-2196 (805) 259-8125



City of  
Santa Clarita

2015 Facilities Plan Draft EIR  
August 29, 1997  
Page 2

August 29, 1997

Mr. Charles W. Carry  
Chief Engineer and General Manager  
Los Angeles County Sanitation Districts  
1955 Workman Mill Road  
Whittier, CA 90601

1997 SEP - 2 AM

Re: Santa Clarita Valley Joint Sewerage System Wastewater Facilities Expansion (2015 Facilities Plan) Draft Environmental Impact Report (EIR)

Dear Mr. Carry:

Thank you for providing the City of Santa Clarita with the opportunity to review and comment on the draft EIR for the Sanitation Districts' proposed expansion of the Santa Clarita Valley Joint Sewerage System, a.k.a. 2015 Facilities Plan. The plan and EIR will become very important guidance documents for future land development in the Santa Clarita Valley. We have reviewed the draft EIR and would like to offer the following comments for inclusion in the final EIR document:

**General Comments**

Population Projections:

The Projections used do not appear to coincide with the projections contained in the North Los Angeles County Subregion 2020 Growth Project Report, dated October 17, 1995. Although the service area study contains three additional census tracts than in the North County Report, discrepancies exist. Clarification would be helpful. A copy of the report is provided. Page 25 in the appendix will be particularly helpful.

6-1

The actual population which will exist in the Santa Clarita Valley will be determined to a greater extent by physical development as approved by both the City and County. The EIR should evaluate the project for a 2015 population based upon the intensity of development which would be allowed under both existing City and County General Plans. Past experience has shown significant differences between SCAG projections for the Santa Clarita Valley and the actual population (based upon General Plan build-out.)

6-2

Future Growth

In the executive summary, page ES-4, it is stated that an eastern Santa Clarita Valley treatment plant site was not selected for future expansion, due to insufficient flow projected by the year 2015 to warrant a plant in the east

6-3

valley. The City's General Plan Public Services, Facilities, and Utilities Element, Policy No. 1.20 (pg. PF-26) states: "Analyze the need for and, if appropriate, encourage the location of a new sanitation plant on the east side of the City as demand increases." There may be more growth potential in this area of the City than the draft EIR presently recognizes. On page 2-14 of the City General Plan, in the section "Existing Land Use," some large projects are listed which are located in the east valley. (Some of these project names have also changed recently). We recommend that the final EIR include an evaluation of growth potential in the eastern portion of the Santa Clarita Valley. The attached map entitled "Future Growth in the Santa Clarita Valley" (published on March 25, 1996 in the *Newhall Signal*) should assist in this effort. Although this information is dated, it graphically depicts the valley wide development activity.

6-3

Base Maps

Where base maps show the City of Santa Clarita boundary, several annexations have occurred since the preparation of these maps. Please update these maps to reflect the current boundary.

6-4

Abandoned Railroad Right-of-Way

In several maps, site plans, and other exhibits in the draft EIR, reference is made to the abandoned Southern Pacific (now Union Pacific) railroad right-of-way (ROW) that presently bisects the Valencia Water Reclamation Plant site. Although it appears by the exhibits shown that this ROW will not be encroached upon, the City of Santa Clarita emphasizes that the City as well as several other local and regional jurisdictions have a strong interest in restoring rail service over this ROW and recommend its preservation for future use. If, in the future, these jurisdictions conclude that rail service will not be restored, then at a minimum, a 30-foot wide multi-use trail easement should be provided to assure implementation of the Santa Clara River Trail Project. (This may occur either in the existing ROW, or in a mutually agreed substitute location.)

6-5

Specific Comments

Page 2-1: Par. 2. City area is now approximately 45 square miles.

6-6

Page 2-6: In the discussion of Significant Ecological Areas, it should be noted that the City as well as the County designate the Santa Clara River as an SEA in their respective general plans.

6-7

Table 5-5 and Fig. 5-1: The subregion, SELAC, is now known as "Gateway Cities." The City of Santa Clarita is not a part of the Ventura Council of Governments. Because no Los Angeles County cities are members of VCOG any longer, we request that you remove the VCOG designation from the map, and correct the map and table to accurately reflect the current SCAG subregions.

6-8

Fig. 9-2: Zoning designations shown within the City limits of the City of Santa Clarita bear the former County designations. This should be changed to the designations used in the City's adopted zoning map and Unified Development Code.

6-9

Table 12-4 and Fig. 12-6: Several new and revised projects in the area of the map in fig. 12-6 are now pending. We suggest that an updated list of new development proposals be made and evaluated for their traffic impacts. Projects such as the North Valencia Specific Plan, Tesoro Del Valle (formerly Clougherty Ranch), and Westridge, would update this project list and map.

6-10

Fig. 12-6: Project No. 17, if located on Avenue Stanford, should be shown east of the I-5 freeway. It is presently shown on The Old Road.

6-11

Fig. 22-1: Please correct the spelling error.

6-12

Thank you again for the opportunity to comment on this important project. Should you have any questions, or additional information, please contact me at (805) 255-4350. We look forward to receiving the final EIR.

Sincerely,



Jeff Chaffin  
Assistant Engineer

MJC:lep  
s:\cd\advancer\advir\03.mjc

Enclosures

cc: Amelia Rietzel, Environmental Programs Coordinator  
Jeff Lambert, Planning Manager  
Mike Ruben, Associate Planner

**Response to Comments From City of Santa Clarita**

6-1 The population projections used in the 2015 Plan are derived from the SCAG 96 population projections. SCAG had revised its projections for the Santa Clarita and Antelope Valleys based on the North Los Angeles County Subregion 2020 Growth Projection Report (2020 Report), dated October, 1995 and included the revision as part of the SCAG 96 projections. The difference between the 2020 Report and the revised SCAG 96 projections was approximately six to seven percent for the years 2000 and 2010 and 1.3 percent for the year 2015. The population totals used for estimating future flows of Districts Nos. 26 and 32 shown in the 2015 Plan are less than that of the SCAG 96 and 2020 Report since not all future growth will necessarily be served by the SCVJSS. Newhall Ranch's projected population, has been excluded because the development proposes its own treatment facilities. In addition, people that may continue to utilize septic tanks because of terrain and proximity to the existing sewerage system, were also excluded. Therefore, the population figures shown in the 2015 Plan do not estimate the growth in the valley but instead estimate the population that would be served by the SCVJSS based on the approved growth projection by SCAG. The Districts based their population estimate on the SCAG 96 projections because the Federal Clean Air Act, in addition to State funding policies, require the loan applicant to use the latest planning assumptions developed by the Metropolitan Planning Organization of the loan applicant's service area which in the Districts' case is SCAG. Table 26-6-1 compares the population projections of the 2020 Report, SCAG 96, and the disaggregated population projections estimated to be served by Districts Nos. 26 and 32. In conclusion, 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.

**Table 26-6-1  
COMPARISON OF PROJECTIONS**

<b>SCAG 96 POPULATION PROJECTIONS</b>				
	<b>1994</b>	<b>2000</b>	<b>2010</b>	<b>2015</b>
CITY	120,565	142,154	174,828	189,654
UNINCORPORATED	52,352	88,164	178,584	235,382
<b>TOTAL</b>	<b>172,917</b>	<b>230,318</b>	<b>353,412</b>	<b>425,036</b>
<b>2020 REPORT POPULATION PROJECTIONS</b>				
	<b>1994</b>	<b>2000</b>	<b>2010</b>	<b>2015</b>
CITY	120,218	140,618	173,598	188,417
UNINCORPORATED	38,437	72,840	160,153	231,002
<b>TOTAL</b>	<b>158,655</b>	<b>213,452</b>	<b>333,751</b>	<b>419,419</b>
<b>DISTRICTS NOS. 26 AND 32 POPULATION PROJECTIONS*</b>				
	<b>1994</b>	<b>2000</b>	<b>2010</b>	<b>2015</b>
CITY		128,782	161,173	175,831
UNINCORPORATED		56,958	95,653	145,102
<b>TOTAL</b>	<b>135,281</b>	<b>185,740</b>	<b>256,826</b>	<b>320,933</b>

Note: a) Derived from the SGAG 96 projections.

Also, the three census tracts in question, Tracts Nos. 910802, 920200 and 920325, that are part of the 2015 Plan's projections and shown on page 5-10, are not listed on page 25 of the 2020 Report only because that page lists the census tracts that are located both in the city and the unincorporated area. The three census tracts in question are solely in the unincorporated area and not in the city. The list showing census tracts located solely in unincorporated areas is included on page 16 of the 2020 Report and contain these three census tracts.

No changes have been made to the Draft 2015 Plan and EIR.

- 6-2** Based on further discussions with and clarification from the city staff, the time frame for build-out of the city allowed by the city's General Plan would overestimate the needs for the year 2015. Therefore, according to the city's planning staff, using population projections that have accounted for the intensity of development to estimate future flows for the year 2015 would be appropriate. The most recent population projections developed by the city are the projections in the 2020 Report and not what is in the 1991 General Plan. The 2020 Report was developed based on intensity of development in that subregion, and jobs, housing, and population were projected based on that information. Since the Districts' population estimates were based on the SCAG 96 projections which in turn were based on the 2020 Report (as explained in comment 6-1), the Districts did indirectly evaluate the recommended project based on intensity of development.

No changes have been made to the Draft 2015 Plan and EIR.

- 6-3** The alternative of constructing an additional treatment plant was considered during the screening of alternatives process. The feasibility of construction of an additional WRP in eastern Santa Clarita Valley was specifically analyzed in the 2015 Plan. However, at the request of the City of Santa Clarita, the Newhall County Water District, and from comments received at the public hearing, Districts' staff reevaluated the alternative due to this letter, a similar written request from the Newhall County Water District (see Comment 9-1), and comments received at the public hearing (see Comment 17-2). Additional information pertaining to new development was provided by the County of Los Angeles Department of Regional Planning and the County of Los Angeles Mapping and Property Management Division for this reevaluation. As suggested by the comments received, and after reviewing eastern valley topographic conditions, the location of the new WRP evaluated was near the intersection of Sierra Highway and Soledad Canyon Road. After evaluation, based on environmental impacts, engineering, operations, economics, growth projections, wastewater generation, and water reuse, Districts' staff reconfirmed that the recommended project is superior to siting a new WRP in the eastern portion of the valley. The justification is provided in the following analysis:

#### **Growth Projections and Wastewater Generation**

Based on SCAG 96 population projections, an additional 15 mgd of wastewater is expected to be generated within the 2015 Plan study area. Further analysis of the SCAG 96 figures and development information shows that approximately two-thirds of this additional flow, or 10 mgd, will be generated

in the area east of and tributary to the SWRP. The SWRP is currently at capacity and, therefore, this flow needs to be treated elsewhere. If a new WRP was sited upstream of the SWRP, near the intersection of Sierra Highway and Soledad Canyon Road, approximately 6 mgd of wastewater could be treated at this new WRP. However, the remaining 4 mgd from the eastern valley and 5 mgd from the western valley (downstream of the SWRP) would still need to be treated at a different location. Therefore, because of this remaining 9 mgd, expansion of the VWRP still would be necessary. Following the 9 mgd expansion at the VWRP (Stage V), construction of a new WRP for the remaining 6 mgd (Stage VI) could be considered in the eastern valley. However, as stated in the DEIR, based on environmental impacts, engineering, operations and economics, construction of Stage VI at the already developed VWRP site having the necessary land (VWRP Stage VI) is considered superior to the alternative of constructing a new WRP.

### **Water Reuse**

The Districts did consider the importance of water reuse in the screening process. However, the environmental, engineering and economic factors again indicated that the alternative of constructing a new wastewater treatment facility closer to the potential reuse areas in the east valley would be less favorable than expanding the existing facilities and building a pipeline to convey reclaimed water to the areas where it is needed.

For example, the environmental impacts associated with a new WRP in the eastern portion of the 2015 Plan study area would likely be greater than those associated with the construction of a reclaimed water delivery system from the SWRP and/or VWRP. Also, after considering the economic and engineering aspects of constructing a reclaimed water delivery system from the SWRP and/or VWRP, the recommended project was found to be consistent with optimizing opportunities for reuse. This is because the costs associated with constructing and operating the new WRP would greatly outweigh those additional costs to construct and operate a reclaimed water delivery system from the SWRP and/or VWRP. This would result in the unit cost of reclaimed water under the alternative of building a new WRP to be significantly greater than the unit cost of reclaimed water under the recommended project.

### **Environmental Impacts**

Furthermore, the alternative was not selected in order to avoid any significant environmental impacts associated with siting a new WRP along the Santa Clara River. Engineering and cost-effectiveness considerations dictate that the most likely site for a new WRP would be as close to the river corridor as possible. Therefore, construction of a new WRP would involve large-scale disruption of land along the river corridor, permanently impacting the habitat supported by the river corridor. For example, construction activities in the river corridor would likely be necessary to build an outfall structure, which would result in significant environmental impacts to the habitat during construction and operation of the WRP. As a consequence, the Districts would need to obtain permits from the various regulatory agencies entrusted with the protection of the river and its resources. The permitting process would greatly increase the lead time needed for project implementation, and thus construction of the needed facilities within the planning time frame could be extremely difficult.

## **Engineering Operations and Economics**

In addition, the cost-effectiveness of expanding an existing WRP is apparent. Many existing support facilities at the Valencia WRP such as laboratories, the outfall, and control buildings can simply be used as is or incrementally expanded at a substantial cost savings as compared to building new support facilities. Furthermore, staffing would not have to be increased significantly for an expansion, whereas a new facility would require a full complement of staff, thus increasing related costs. Also, no land acquisition would be required as part of the recommended project, resulting in savings of both cost and time.

The recommended project of expanding the Valencia WRP was determined to be superior for a number of operational reasons as well. A new WRP in the eastern part of the valley would need to construct either independent solids processing facilities or, due the distance from the new WRP to the VWRP, a force main system to pump solids to the VWRP for treatment. Both of these solid processing alternatives would involve additional operational requirements and substantial cost.

The Draft 2015 Plan and EIR have been changed as follows:

Page ES-4, first column, third paragraph, beginning at the second sentence:

~~While the topography of the region, which enables easy discharge of effluent to the Santa Clara River, made an eastern treatment plant advantageous, it was rejected since not enough flow is projected by the year 2015 in the eastern SCVJSS service area to warrant an expansion. 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.~~

Page ES-4, second column, first paragraph, beginning at the first sentence:

~~It was determined that while potential flow justified a western treatment plant, the time needed to acquire land was considered prohibitive since existing system capacity is expected to be exceeded by 1999. 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.~~

Page 6-6, first column, third paragraph, beginning at the second sentence:

While the topography of the region, which enables easy discharge of effluent to the Santa Clara River, made an eastern treatment plant advantageous, it was ~~rejected not selected~~ because it would not accommodate treatment of all the flow generated in the SCVJSS through 2015. ~~Projections by SCAG predict the majority of growth will occur in the western part of the valley, which could not be accommodated by a plant located in the eastern part of the valley without pumping wastewater uphill. Notwithstanding the projected growth in the eastern part of the valley, some flow would not be tributary to a site in the eastern valley, necessitating expansion of the VWRP. 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. If growth occurs in the eastern part of the valley beyond 2015, or as assumptions of growth change, a site in the eastern part of the valley may again be considered.~~

Page 6-6, first column, fourth paragraph, beginning at the first sentence:

~~Unlike the eastern part of the valley, there is significant projected growth in the western part of the valley through 2015 to justify the construction of a treatment plant. It was determined, however, that while potential flow justified this alternative, the necessary criteria would not be satisfied. 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.~~

6-4 Figures 2-1 and 2-3, have been updated in the Draft 2015 Plan to indicate the current boundary of the City of Santa Clarita.

6-5 Comment noted.

No changes have been made to the Draft 2015 Plan and EIR.

6-6 Page 2-1, first column, second paragraph of the Draft 2015 Plan and EIR has been changed as follows:

The planning area .... occupies approximately ~~42~~ 45 square miles in the central part of the valley.

6-7 Page 2-6, first column, first paragraph of the Draft 2015 Plan and EIR has been changed as follows:

There are five designated SEAs in the Santa Clara Valley. ~~T~~, the Santa Clara River SEA is being the largest in the valley. The city as well as the county have designated the Santa Clara River as an SEA in their respective general plans.



6-8 The SCAG subregions shown in Table 5-5 and Figure 5-1 were obtained from SCAG on January 28, 1997 at the time the Draft 2015 Plan was being prepared. SCAG revised their subregions' projections in July of 1997. Changes were made to Table 5-5 as shown below and in the Draft 2015 Plan. Figure 5-1 was also revised in the Draft 2015 Plan.

**Table 5-5  
SCAG 96 FORECAST BY SUBREGIONS**

SUBREGIONS	POPULATION			
	1994	2000	2010	2015
<b>North Los Angeles<sup>a</sup></b>	<b>451,374</b>	<b>595,899</b>	<b>877,276</b>	<b>1,032,433</b>
Los Angeles City	3,703,125	3,808,303	4,350,240	4,643,831
Las Virgenes Malibu Conejo Council	3,656,727	3,847,905	4,298,926	4,578,712
Arroyo Verdugo	75,283	81,740	94,516	100,354
San Gabriel Valley COG	537,977	556,845	604,264	647,404
West Side Cities	1,482,110	1,567,039	1,673,873	1,728,896
South Bay Cities COG	226,972	233,678	242,470	248,109
SELAG Gateway Cities COG	822,757	861,509	888,534	907,300
Orange County	818,992	857,709	884,533	902,803
Western Riverside COG	1,978,583	2,083,298	2,193,168	2,271,327
Coachella Valley	1,982,105	2,086,853	2,196,912	2,275,588
VCOG: Ventura County	2,595,147	2,739,329	3,022,584	3,165,447
VCOG: LA County Cities	1,144,882	1,348,032	1,783,900	2,041,958
San Bernardino	1,127,462	1,367,271	1,818,892	2,081,165
Imperial	261,997	319,464	389,151	429,105
SCAG Total <sup>b</sup>	249,416	300,224	354,244	389,904
Counties:	709,758	712,629	804,329	861,563
Los Angeles	28,647	31,000	34,000	35,000
Orange	1,558,345	1,874,789	2,322,108	2,581,096
Riverside	138,470	148,983	207,307	240,813
San Bernardino	15,640,143	16,970,887	19,402,260	20,834,281
Ventura	15,610,100	16,970,900	19,402,200	20,834,300
Imperial	9,231,545	9,827,661	10,872,791	11,514,299
SCAG Total <sup>b</sup>	2,595,147	2,739,329	3,022,584	3,165,447
Los Angeles	1,376,878	1,667,496	2,173,141	2,471,063
Orange	1,558,345	1,874,789	2,322,108	2,581,096
Riverside	709,758	712,629	804,329	861,563
San Bernardino	138,470	148,983	207,307	240,813
Ventura	15,640,143	16,970,887	19,402,260	20,834,281
Imperial	15,610,100	16,970,900	19,402,200	20,834,300

Source: Southern California Association of Governments.

Note: a) Includes the SCVJSS service area.

b) Rounded to the nearest hundreds

6-9 Comment noted and changes to the Draft 2015 Plan and EIR have been made where appropriate.

- 6-10** Based on discussions with the city planning staff, Table 12-4 has been revised and the traffic impacts have been reevaluated as follows:

The Tesoro Del Valle and Westridge developments are beyond the one-mile radius area of the VWRP site (per city staff) and are therefore, not included in the revision. The North Valencia Specific Plan was part of the related project list in Table 12-4 of the draft 2015 Plan EIR and listed as Tract 51281. It was obtained from the county list of related projects prior to it becoming a city project. However, the EIR has been revised to reflect the latest changes to this development based on new information from the city and is shown in Table 12-4 as project no.16. Other revisions based on the city's latest list of related projects, include the deletion of PR20669 and the inclusion of MC96-003 designated as project no.15. All changes to Table 12-4 are shown below at the end of the responses of this letter, and are reflected in the EIR.

Tables 12-3, 12-5, and 12-6, and Figures 12-6 through 12-10 in the EIR resulted in changes due to the revised traffic impact analysis caused by the revision of Table 12-4 and lane configuration changes discussed in Letter 5. These changes were minor in nature and the impact remains as less than significant. Changes to Tables 12-3, 12-5, and 12-6 are shown under the response to Letter 5 and are reflected in the EIR. Changes to Figures 12-6 through 12-10 are reflected in the EIR.

- 6-11** Project No. 17 has been shown at its correct location in revised Figures 12-6 and 12-7.
- 6-12** "Track" was changed to "Tract" in revised Figure 22-1.

**Table 12-4  
TRAFFIC GENERATION BY OTHER KNOWN PROJECTS**

NO.	PROJECT TITLE & LOCATION	TYPE & SIZE/UNIT	DAILY TWO-WAY VOLUME		AM PEAK HOUR VOLUME				PM PEAK HOUR VOLUME			
			PER UNIT	TOTAL TRIPS	PER UNIT I/B	PER UNIT O/B	TOTAL TRIPS I/B	TOTAL TRIPS O/B	PER UNIT I/B	PER UNIT O/B	TOTAL TRIPS I/B	TOTAL TRIPS O/B
1	Tract 33608 Pico Canyon/ The Old Road	S-F 101 DU	10.3	1,040	0.21	0.6	20	60	0.7	0.38	70	40
		M-F 16 DU	8.6	140	0.13	0.63	5	10	0.58	0.30	10	5
		NC 871 (M-F Assumed)	8.7	7,580	0.16	0.45	135	390	0.57	0.31	495	265
		Open Space	—	—	—	—	—	—	—	—	—	—
2	Tract 43896 1 mile West of I-5 South of Pico Cyn Road	S-F 280 DU	9.5	2,660	0.18	0.52	50	145	0.63	0.34	180	95
		Park 262.78 Acres	19.15	5,030	0.41	0.17	110	45	0.58	0.62	150	160
3	Tract 45433 West of The Old Road between McBean Pkwy & Magic Mountain Pkwy	S-F 1,070 DU	8.6	9,160	0.15	0.44	165	465	0.56	0.3	595	320
		M-F 4 DU	10.6	40	0.17	0.85	5	5	0.74	0.38	5	5
		NC 798 (M-F Assumed)	8.8	6,990	0.16	0.45	125	360	0.57	0.31	455	245
		R 3 (Res. Assumed)	10.6	30	0.17	0.85	5	5	0.74	0.38	5	5
		School (500 Students Assumed)	1.38	690	0.28	0.13	140	65	0.02	0.06	10	30
		2 Parks 15 acres	19.15	290	0.41	0.17	5	5	0.58	0.62	10	10
4	PM 19050 Valencia Blvd between The Old Rd & I-5	5 Lots (225,500 GSF Assumed) 11.5 acres	40.0	9,020	0.72	0.48	160	110	1.8	1.8	405	405
5	PM 18654 Magic Mountain Pkwy	11 Lots (656,700 GSF Assumed) 33.5 Acres	40.0	26,270	0.72	0.48	475	315	1.8	1.8	1,180	1,180
		Open Space	—	—	—	—	—	—	—	—	—	—
6	PM 20186 South of Rt. 126 between Co. Line & Knudsen Pkwy	S-F 20 DU on 9,925 Acres	11.7	230	0.26	0.74	5	15	0.82	0.44	15	10
7	CP 88376 West of I-5 between McBean & Magic Mountain Pkwy	Golf Course 195 Acres	8.3	1,620	0.22	0.05	40	10	0.08	0.31	15	60
8	Tract 44806 NW Quadrant of The Old Rd & Pico Cyn	Condos & DU on 20.1 acres	9.5	80	0.15	0.73	5	5	0.65	0.34	5	5
9	Tract 48208 South along Pico Cyn between West of I-5 & East of Moor Cyn	M-F 7 DU	9.7	70	0.15	0.75	5	5	0.67	0.35	5	5
		NC's 59 Units (M-F Assumed)	10.8	640	0.23	0.64	15	40	0.74	0.40	45	25
		Open Space	—	—	—	—	—	—	—	—	—	—
		—	—	71,580	—	—	1,460	2,055	—	—	3,655	2,860

**Table 12-4 (Continued)**  
**TRAFFIC GENERATION BY OTHER KNOWN PROJECTS**

NO.	PROJECT TITLE & LOCATION	TYPE & SIZE/UNIT	DAILY TWO-WAY VOLUME		AM PEAK HOUR VOLUME				PM PEAK HOUR VOLUME			
			PER UNIT	TOTAL TRIPS	PER UNIT I/B	PER UNIT O/B	TOTAL TRIPS I/B	TOTAL TRIPS O/B	PER UNIT I/B	PER UNIT O/B	TOTAL TRIPS I/B	TOTAL TRIPS O/B
10.	Tract 48026 South of Pico Cyn Rd West of McBean Pkwy 3,500 ft West of The Old Rd	M-F 1 DU	13.0	10	0.23	1.14	5	5	0.95	0.49	5	5
		NC 75 (M-F Assumed)	10.6	790	0.22	0.62	15	45	0.72	0.39	55	30
		Rec Lot 1 (M-F Assumed)	—	—	—	—	—	—	—	—	—	—
11.	Tract 49099 West of Hemming Way between McBean & Poe Pkwy	S-F 311 DU	9.4	2,940	0.18	0.51	55	160	0.63	0.34	195	105
12.	Tract 49762 West of Hemming Way between McBean & Poe Pkwy	S-F 171 DU	9.09	1,690	0.20	0.56	35	95	0.67	0.36	115	60
13.	PM 94807 South of Hwy 126 West of I-5 S to Santa Susana West to Co. Line	S-F 24,700 DU	3.4	83,980	0.03	0.17	740	4,200	0.18	0.09	4,445	2,225
14.	TR 52006 South of Magic Mountain Pkwy East of I-5	M-F 76 DU	6.8	520	0.09	0.45	5	35	0.43	0.22	35	15
16.	PR 20669 South of Anza Dr West of Hopkins Ave	Ind 9 Lots (286,200 GSF Assumed) 14.6 Acres	7.0	890	0.76	0.16	95	20	0.12	0.86	15	110
15.	MC 96-003 N/O Valencia Blvd. between Touney Rd. And McBean Pkwy.	M-F 350 DU	5.4	1,890	0.07	0.33	25	115	0.33	0.169	115	60
		S-F 190 DU	9.8	1,860	0.19	0.55	35	105	0.66	0.355	125	65
16.	Tract 51281 95-242 between Santa Clara River & Magic Mountain Pkwy	M-F 1,2450 DU	4.5	5,5480	0.05	0.25	65	310	0.26	0.13	325	16570
		S-F 750 DU	8.8	6,600	0.16	0.46	120	345	0.58	0.31	430	235
		Industrial 167,000 GSF	7.0	1,160	0.76	0.16	130	25	0.12	0.86	20	145
		Comm. (278,350 636,000 GSF Assumed) 14.2 Acres	40.0 35.8	11,140 22,790	0.72 0.48	0.48 0.28	200 305	135 180	1.8 1.68	1.8 1.68	500 1,070	500 1,070
		Elem. Sch. 500 Students	1.1	550	0.18	0.12	90	60	0.02	0.035	10	20
17.	MC 96191 East of Ave Stanford & Magic Mountain Pkwy	Ind. 39,000 GSF	7.0	270	0.76	0.16	30	5	0.12	0.86	5	35
18.	MC 95138 North of Rye Cyn Rd	Business Park 4 Million GSF	12.7	50,740	1.18	0.21	4,470	835	0.22	0.79	895	3,175
		—	—	230,090	—	—	7,435	7,900	—	—	10,245	9,295

Notes: Based on generation rates and equations from ITE's handbook (ITE, 1991).  
Volume is a trip-end either inbound (I/B) or outbound (O/B).  
Trip-ends are one-way traffic movements entering or leaving the site. All whole numbers are rounded to nearest five.

Letter 7



Board of Directors  
Sheldon G. Berger, President  
Daniel C. Naumann, Vice President  
F. W. Richardson, Secretary/Treasurer  
Henry Lubartow  
Lynn E. Maultsford  
Dan Parkinson  
Joe Terry, Sr.  
Legal Council  
Philip C. Drescher  
General Manager  
Frederick J. Gemke

UNITED WATER CONSERVATION DISTRICT

"Conserving Water Since 1927"

August 29, 1997

Charles W. Carry  
Chief Engineer and General Manager  
County Sanitation Districts of Los Angeles County  
1955 Workman Mill Road  
Whittier, CA 90601-1400

Subject: Comments on the Draft 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan and EIR

Dear Charles,

United Water Conservation District (United) has reviewed the Draft 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan and EIR and submits the following comments for consideration. Comments are generally preceded by page or figure numbers from the 2015 document for ease of reference.

Chapter 5 does not address the different sources of water supplied by water purveyors during average or wet periods, as opposed to drought periods. During extended dry periods State Water Project deliveries are likely to be reduced, and more of the water supply will be pumped from the Alluvial and Saugus Aquifers of the Eastern Groundwater Basin

- There is no mention of changes in influent water quality during drought periods. Increased use of local groundwater will change the quality of the influent and plant effluent. Records of WRP effluent from the most-recent drought should be reported. Water quality records from historical low water levels in local purveyor wells should be reported.
- During drought periods there will presumably be less water usage due to conservation efforts, resulting in reduced discharge to the Santa Clara River.

5-2 CLWA forecasts a water shortfall occurring in 2006.

- Does this include potential reductions in State Water Project deliveries?
- Does this assume some basin safe yield or maximum pumping rates from the local aquifers?
- Does this shortfall include specific assumptions regarding the use of reclaimed water?

1997 SEP -5 AM 10:47



UNITED WATER CONSERVATION DISTRICT

6-3 The RWQCB, in the current NPDES permit, has given the Districts until June 2003 to meet the Basin Plan objectives for ammonia.

- When is the proposed nitrification-denitrification facility scheduled for completion and use? 7-6 states only that it is scheduled to comply with the June 2003 deadline. Given the acknowledged toxicity of ammonia to fish and other aquatic species, will the nitrification-denitrification facility be constructed sooner?

7-7

6-6 The existing system capacity is expected to be exceeded by 1999.

- When system inflow exceeded plant capacity from 1992 through 1994, what was the effect on effluent water quality?
- Were certain constituents out of compliance?
- What water quality effects are expected in 1999 if plant expansions are not complete?

7-8

7-9

7-10

16-5 The statements regarding the "perennial gap" in Santa Clara River flow through the Piru Basin west of the Los Angeles/Ventura County line are inaccurate. Continuous surface flow generally exists along this reach during the winter months, not just during flood conditions. Continuous flows of as little as 200 to 250 cfs at the County line will exceed the infiltration capacity of the riverbed in the Piru Basin and flow into the Fillmore Basin. This is supported by United's monitoring of water releases from Castaic Lake, which flow down Castaic Creek to the Santa Clara River, across the Piru Basin, to the Freeman Diversion near Saticoy. During the dry summer months, when rising waters on the western side of the Eastern Groundwater Basin and effluent from the Saugus and Valencia WRPs are the major source of flow in the river, flows generally percolate entirely into the Piru Basin, resulting in several miles of dry river bed, as stated in the 2015 plan. It would be correct to state that only during very dry winters are there dry reaches of riverbed in the Piru and Fillmore Basins. Under wet antecedent conditions, flows of less than 200 cfs will flow from the County line to the mouth of the Santa Clara River near Ventura Harbor.

7-11

Figure 16-3. Please confirm that the Castaic Creek South gauging station is still in operation.

7-12

16-6 It would be much more informative if the percent effluent in the Santa Clara River was presented in a table, with average river flow and percent effluent for each month of the year.

7-13

16-7 The proposed Newhall Ranch development has not identified an adequate water supply and will pump groundwater from the Alluvial and Saugus Aquifers, as well as receiving State Water Project water through Valencia Water Company. An Aquifer Storage and Recovery program is also planned, which may greatly perturb water levels in

7-14



the Alluvial and Saugus Aquifers, and induce groundwater recharge where rising water is now common.

16-7 The Newhall Ranch Project intends to reuse all of the 7.7 mgd from its WRP, except during wet winter months when irrigation demands are reduced. Discharge from this WRP should be expected only in the winter.

7-15

16-7 The discussion on Newhall County Water District's reclaimed water service is unclear and warrants further explanation.

7-16

- What is the source of the water discharged to Castaic Lagoon?
- What groundwater basins would be recharged with reclaimed water?

16-8 As mentioned above, it is incorrect to assume that all surface water percolates into the Piru Basin. The footnote on this page is correct in stating it would be speculative to attempt to address all impacts downstream of the County line gauge, but it is inaccurate to dismiss all downstream impacts by stating that all flow percolates.

7-17

16-10 The mean monthly flows for various points along the Santa Clara River, listed in the tables of Appendix D, are not as meaningful as averages differentiated by wet and dry years for the same period of record. Maximum and minimum flows from wet and dry years would also help to give a sense for the high variability of flows in the river. Flows in the Santa Clara River are highly variable between and within months of the year, and this variability is not apparent from the tables in the 2015 plan.

7-18

16-12 Under the various discharge scenarios, values for the amount of recharge to the Piru Basin are listed. At certain times of the year the Santa Clara River flows continuously through the Piru Basin, as explained above.

- It would be more appropriate to state anticipated flows at the County line gauging station.
- In the percentage comparisons to the existing discharge scenario, the percentage changes appear to be calculated based on average monthly stream flow. The variability of the flows between wet and dry years needs to be addressed.

7-19

16-13 Discharge scenarios do not account for changes in the water levels in the Alluvial Aquifer. During extended dry periods water levels in the Alluvial Aquifer are known to decline, resulting in more recharge in the Eastern Groundwater Basin and less rising groundwater creating surface flow into the Piru Basin.

7-20

16-16 Areas of rising waters near the western margin of the Eastern Groundwater Basin may be significantly reduced in the future by increased groundwater pumping from the Alluvial and Saugus Aquifers. This will influence the volume of water flowing in the Santa Clara River at the County line.

7-21

17-2 Reclaimed water used to recharge groundwater generally must meet California drinking water standards for trace constituents.

- Given that effluent from the Saugus and Valencia WRPs serves as groundwater recharge in the Eastern Groundwater Basin in Los Angeles County and the Piru, Fillmore, Santa Paula and Oxnard Forebay Basins in Ventura County, Table 17-1 should also include drinking water standards for comparison with plant effluent. The range of the levels of constituents in the effluent should also be included, rather than just average concentrations.

7-22

17-7 It is noted that an interim chloride standard of 190 mg/l has been adopted, subject to review in 2001. Given that the Basin Plan identifies agricultural supply and groundwater recharge as beneficial uses of Hydrologic Unit No. 403 51 (page 17-3) and these are beneficial uses of Santa Clara River water in Ventura County, the County Sanitation Districts of Los Angeles County should be prepared for the possible requirement to reduce chloride levels in WRP effluent to levels appropriate for these beneficial uses.

7-23

17-7 While it is noted that elevated ammonia levels are toxic to aquatic life, it is not noted that ammonia in the river can undergo nitrification, forming nitrate, which may promote the growth of aquatic plants. More importantly, elevated nitrate levels in drinking water can pose a health risk to humans, and effluent from the District's WRPs recharges the Eastern Groundwater Basin and groundwater basins in Ventura County.

- The potential health risks of the total nitrogen of receiving waters listed in Table 17-2 should be discussed.
- Maximum concentrations should be included along with average discharge concentrations.
- Consideration should be given to constructing the nitrification-denitrification facility well before the 2003 deadline.

7-24

7-25

7-26

17-10 Where are the groundwater sampling stations located with respect to the WRP discharge sites?

7-27

- At what depths are the wells screened, and how far from the active river channel are the wells located?

7-28

17-12 There is an inconsistency in the statements that all waters infiltrate into the Piru Basin then, in the following paragraph, that the District's WRP discharges will impact the Piru, Fillmore and Santa Paula Basins.

7-29

- What is the basis for the belief that the recent trend in improving chlorides in State Water Project water will continue?

7-30

- The RWQCB basin objective for chloride in groundwater is 100 mg/l west of Piru Creek and in the Fillmore Basin, 110 mg/l in the western Santa Paula Basin, and 150

7-31



UNITED WATER CONSERVATION DISTRICT

mg/l in the Oxnard Forebay. United considers recharge waters exceeding these chloride objectives a significant impact. | 7-31

- Until the nitrification-denitrification facility is functioning, the total nitrogen content of the effluent will continue to impact the downstream basins (page 17-13). We do not feel that these impacts are less than significant. | 7-32

17-13 It is incorrect to state that Valencia WRP effluent causes no degradation of surface water quality. Comparison of downstream Valencia WRP effluent to Saugus WRP effluent in the river is not a meaningful comparison. Comparisons should be made to water quality samples from Sample Station R-A, located upstream of the discharge points of both of the WRPs | 7-33

17-15 Given that the 4-day limits for ammonia concentrations are generally not met, this is a significant impact to the downstream users. Now that an appropriate nitrification-denitrification process has been identified, will it be implemented during the first phase of the plant expansions? | 7-34

18-4 The peak of steelhead trout upstream migration is in January and February, when there is generally continuous flow in the Santa Clara River from the Valencia WRP to the mouth of the river near Ventura. It is not correct to say that the fish are not directly affected by plant effluent. The gap in flow does not exist during these months, except in very dry years. Many additional arguments in this chapter, based on the assumption of a gap in perennial flow except during high floodflows, are inaccurate and need to be revised. | 7-35

We appreciate the opportunity to comment on this document, and look forward to having these comments addressed in the final Santa Clarita Valley Joint Sewerage System Facilities Plan and EIR. Please call Ken Turner or Dan Detmer at our Santa Paula office if you have any questions concerning these comments.

Sincerely,  
*Kenneth H. Turner*  
Kenneth H. Turner  
Groundwater Manager

cc Regional Water Quality Control Board, Los Angeles Region  
Piru/Fillmore Basin AB3030 Groundwater Management Council  
BDRF

KHT/mk  
file County Sanitation Districts of Los Angeles County

**Response to Comments From United Water Conservation District**

7-1 Local water suppliers dictate the mix of water supply from the different sources, due to climatic or other conditions. Thus, the Districts have no control over the composition of the supply water, including its salinity. Therefore, any impacts to the water quality of the SCVJSS effluent are incidental to decisions made by the entities supplying the water.

Nevertheless, different water supply sources do not, in general, significantly impact Districts' treatment efficiency or effluent quality. A notable exception to this is the impact of chloride levels in the potable water supply on effluent quality. Chlorides cannot be removed as part of normal tertiary wastewater treatment processes and, therefore, elevated levels of chlorides in the supply water result in concomitant elevated levels in the WRP effluent.

As a result of higher salinity experienced during the drought, and its potential impact on agricultural activities, the RWQCB has embarked on a comprehensive study to identify and control salinity, including chloride levels, in the Santa Clara River Watershed. The study is intended to develop a complete salinity management program for the Santa Clara River Watershed.

No changes have been made to the Draft 2015 Plan and EIR.

7-2 While it is true that different sources of water supply will have different constituent concentrations, as noted above, generally they have not significantly impacted Districts' effluent quality as indicated by effluent monitoring during the drought period. 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.

**Table 26-7-1  
1990 AVERAGE SCVJSS EFFLUENT QUALITY**

<b>CONSTITUENT</b>	<b>SAUGUS WRP EFFLUENT</b>	<b>VALENCIA WRP EFFLUENT</b>
BOD <sub>5</sub> (mg/l)	7	6
Suspended Solids (mg/l)	< 2	< 2
Settleable Solids (ml/l)	< 0.1	< 0.1
Oil and Grease (mg/l)	< 1.3	< 1.0
Total Dissolved Solids (mg/l)	665	794
Chloride (mg/l)	139	161
Sulfate (mg/l)	121	180
Boron (mg/l)	0.86	0.73
Fluoride (mg/l)	0.21	0.30
Detergents [MBAS] (mg/l)	0.24	0.11
Coliform Group (MPN/100 ml)	< 1	< 1
Nitrate+Nitrite Nitrogen (mg/l)	3.13	7.31
Turbidity (NTU)	1.2	1.1



**Table 26-7-1 (Continued)**  
**1990 AVERAGE SCVJSS EFFLUENT QUALITY**

CONSTITUENT	SAUGUS WRP EFFLUENT	VALENCIA WRP EFFLUENT
pH	7.21	7.01
Antimony (mg/l)	< 0.2	< 0.2
Arsenic (mg/l)	< 0.002	< 0.002
Barium (mg/l)	< 0.02	< 0.02
Beryllium (mg/l)	< 0.01	< 0.01
Cadmium (mg/l)	< 0.01	< 0.009
Chromium [VI] (mg/l)	< 0.02	< 0.02
Iron (mg/l)	< 0.03	0.04
Lead (mg/l)	< 0.04	< 0.04
Mercury (mg/l)	< 0.0002	< 0.0002
Nickel (mg/l)	< 0.03	< 0.03
Selenium (mg/l)	< 0.002	< 0.003
Silver (mg/l)	< 0.005	< 0.005
Zinc (mg/l)	0.03	0.05
Cyanide (mg/l)	< 0.02	< 0.02
Endrin (µg/l)	< 0.01	< 0.01
Lindane (µg/l)	< 0.02	0.02
Methoxychlor (µg/l)	< 2	< 2
Toxaphene (µg/l)	< 5	< 5
2,4 - D (µg/l)	< 10	< 5
2,4,5-TP [Silvex] (µg/l)	< 2	< 1
Tetrachloroethylene (µg/l)	< 0.5	< 0.9
Carbon Tetrachloride (µg/l)	< 0.5	< 0.5
1,1,1-Trichloroethane (µg/l)	< 0.5	< 0.5
p-Dichlorobenzene (µg/l)	< 0.5	< 0.5
Di[2-ethylhexyl]phthalate (µg/l)	< 55	< 55

Records of water quality of individual supply wells during the drought generally were not pursued since they would not have provided data useful in the analysis of water quality impacts under the recommended project. The relationship between individual well water quality and the resulting water quality of the effluent is, at best, a tenuous one. Effluent water quality is impacted by a number of other variables including residential, commercial, and industrial constituent loadings, the distribution of water supply between local and imported sources, and the efficiency of the treatment process. Well data would only provide information on the water quality of local water supply sources. The variability of the mix of supply water between imported and local sources, as well as the variability in water quality between individual wells, makes water quality data from individual wells insufficient in itself for any useful analysis of the resulting effluent for the majority of constituents.

Instead, the Districts rely on the actual monitored influent and effluent characteristics of the wastewater to identify potential water quality impacts. Influent concentrations of selected constituents have been presented in Chapter 5, Table 5-3. However, due to recent salinity management concerns, the quality of well water for selected constituents, such as chlorides, is routinely tracked and monitored by the Districts.

No changes have been made to the Draft 2015 Plan and EIR.

7-3 Comment noted.

No changes have been made to the Draft 2015 Plan and EIR.

7-4 Yes, the CLWA model incorporates many variables including the possibility of reductions in SWP supply.

No changes have been made to the Draft 2015 Plan and EIR.

7-5 Yes, the CLWA model includes constraints on the safe yield of water from the local aquifers.

No changes have been made to the Draft 2015 Plan and EIR.

7-6 Yes, the analysis is based upon no use of reclaimed water.

No changes have been made to the Draft 2015 Plan and EIR.

7-7 Figure 7-2 presents the implementation schedule for the recommended project. As shown, the upgrade of both the SWRP and VWRP will be complete by mid-2003. Note the extended construction period for the upgrade. The extended period is necessitated by the fact that the upgrade will require that aeration tanks be taken out of service for modification, thereby temporarily reducing the capacity of the WRP. This necessitates that the upgrades be done one tank at a time and at one WRP at a time to minimize any potential water quality impact due to the reduced plant capacity.

Furthermore, prior to design and construction, a number of steps need be completed. These steps include continued full-scale tests of various design criteria and operational schemes in order to optimize the proposed nitrification-denitrification process, construction of relief of trunk sewers downstream of the SWRP to divert flow during the upgrade of the SWRP, and scheduling of the VWRP upgrade so as not to interfere with the concurrent expansion related construction. The Districts have scheduled the various activities to ensure meeting the NPDES permit deadline for ammonia control.

No changes have been made to the Draft 2015 Plan and EIR.

7-8 The effect of exceeding nominal plant capacity during 1992 through 1994 on water quality was negligible. With the exception of the period immediately after the 1994 Northridge Earthquake, the SWRP and VWRP monitoring programs revealed no discernible change in the number of NPDES permit

noncompliance occurrences. Any occurrences noted were due to operational conditions (i.e. equipment malfunctions), as opposed to conditions caused by excess flow.

No changes have been made to the Draft 2015 Plan and EIR.

- 7-9 As noted in the response above, the SWRP and VWRP monitoring programs revealed no discernible change in the number of NPDES permit noncompliance occurrences for any individual constituents during the 1992 through 1994 period.

No changes have been made to the Draft 2015 Plan and EIR.

- 7-10 Due to the conservative design of the SWRP and VWRP and the operational flexibility built into them, including flow equalization, the Districts expect no significant water quality impacts for the short period during which the flow might exceed the WRPs' stated capacities. The capacities as stated in the NPDES permits for the SWRP and VWRP are nominal and can be exceeded temporarily without permit violations by maximizing each treatment process.

No changes have been made to the Draft 2015 Plan and EIR.

- 7-11 The *Santa Clara River Water Quality Study* (DWR, 1968) and the *Unarmored Threespine Stickleback Recovery Plan* (USFWS, 1979) indicated that the gap in perennial flow only closed during flood events. United contends that the gap may close at much lower flows than reported. In response, Jones & Stokes Associates, Districts' consultant, contacted United to obtain supplemental information regarding base flows in the Santa Clara River. United sent figures depicting the receipt efficiency of the Freeman Diversion project for the last five years. Each of the figures indicates baseflow for the Santa Clara River that is either extrapolated or estimated; no gauge data is referenced. The Freeman Diversion project is located in the Fillmore Groundwater Basin in an area of rising groundwater (DWR, 1968) downstream of the gap in perennial flow. Therefore, it is expected that there would be some Santa Clara River inflow at the Freeman Diversion. However, it can not be concluded from the data that Santa Clara River inflow at the diversion equates to continuous perennial surface flow along the entire gap.

When releases are made from Santa Felicia Dam (Lake Piru) to Piru Creek, there may temporarily be continuous flow to the Freeman Diversion Project. The confluence of Piru Creek with the Santa Clara River is approximately 3.5 miles downstream of the point of percolation. The release data shows that releases are made from August through December, prior to the rainy season. During a recent communication between Districts and United staff,<sup>1</sup> United agreed that a gap in perennial flow generally exists along the Santa Clara River upstream of its confluence with Piru Creek.

---

1. September 23, 1997, telephone conversation between Jose Saez of the Districts and Jamie Labor of United Water Conservation District.

At this time, there is no compelling evidence to justify changing the conclusion that the gap in perennial flow is closed only during flood events.

No changes have been made to the Draft 2015 Plan and EIR.

- 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.

No changes have been made to the Draft 2015 Plan and EIR.

- 7-13 Average river flow and the percent effluent for each month is shown in Table D-11 of Appendix D.

Page 16-6, second column, second paragraph, last sentence of the Draft 2015 Plan and EIR has been changed as follows:

~~Instead, nearly all treated effluent is discharged to the river, accounting for approximately 15 percent of total stream flow in the reach of the river from the SWRP to the county line during the wet season and up to approximately 85 percent of total flow during the dry season. Table D-11 of Appendix D shows that effluent accounts for approximately 15 percent of the total stream flow in the reach of the river from the SWRP to the county line during the wet season and up to approximately 85 percent of total flow during the dry season.~~

- 7-14 Through the Cumulative Discharge Scenario, the Draft 2015 EIR assesses the cumulative impact of combined discharges from the SWRP, VWRP, and Newhall Ranch WRP. In addition, Section 4.11, Water Resources, of the *Newhall Ranch Specific Plan Draft EIR* states that the Newhall Ranch Project will be supplied with water through CLWA and the Valencia Water Company. Section 4.11 also states that the Newhall Ranch Project's reliance on CLWA and Valencia Water Company water will be substantially reduced 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.

A potential component of the Newhall Ranch Project is Aquifer Storage and Recovery (ASR). As stated in the *Newhall Ranch Specific Plan Draft EIR*, 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. In general, mitigation of impacts caused by Newhall Land and Farming Company are the responsibility of Newhall Land and Farming Company and are not the responsibility of the Districts.

No changes have been made to the Draft 2015 Plan and EIR.

- 7-15 The Draft 2015 EIR describes the expected discharges from the Newhall Ranch WRP on page 16-10 in the Cumulative Discharge Scenario discussion. 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 *Newhall Ranch Specific Plan Draft EIR*.

No changes have been made to the Draft 2015 Plan and EIR.

- 7-16 According to recent communication with the Newhall County Water District,<sup>2</sup> the project is no longer viable and has been dropped.

Page 16-6, second column, fourth paragraph, last sentence of the Draft 2015 Plan and EIR have been changed as follows:

The most significant of these proposed projects are Newhall Ranch and CLWA's reclaimed water system, and NCWD's reclaimed water service.

Page 16-7, second column, last paragraph of the Draft 2015 Plan and EIR has been changed as follows:

#### ~~Newhall County Water District Reclaimed Water Service~~

~~NCWD's proposed reclaimed water service involves direct use (primarily for irrigation) and discharge to Castaic Lagoon, from which downstream groundwater recharge basins would be served. The identified reclaimed water demands are 5,200 AFY, of which 2,200 AFY would be for indirect uses, such as groundwater recharge.~~

- 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.

No changes have been made to the Draft 2015 Plan and EIR.

- 7-18 Although the wet weather flow varies from year to year and can increase significantly in response to storm water runoff, 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.

No changes have been made to the Draft 2015 Plan and EIR.

---

2. September 10, 1997, telephone conversation between Ajay Malik of the Districts and Thomas E. Shollenberger, Interim General Manager of the Newhall County Water District.

- 7-19** Table D-5 of Appendix D identifies anticipated flows at the county line under each discharge scenario. The percentage comparisons are based on average monthly discharges. Because water conservation measures typically reduce landscape irrigation, sidewalk washing, and other types of consumption that do not significantly affect wastewater flow, 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, which began in 1986 and officially ended in 1993. As noted on page 5-12, the SCVJSS experienced a minor decline in the per capita wastewater generation rate during the drought period. Increases in the wastewater flow can be attributed to population growth.

No changes have been made to the Draft 2015 Plan and EIR.

- 7-20** The hydrological analysis in the Draft 2015 Plan and EIR did account for changes in the water levels in the Alluvial Aquifer. The mean monthly flow data used to calculate discharge and recharge levels along each reach of the river were generated between 1972 and 1995. During this 24-year range, the region experienced years of below average, average, and above average precipitation. Therefore, the discharge and recharge levels used in the analysis reflect groundwater levels associated with both wet and dry periods.

No changes have been made to the Draft 2015 Plan and EIR.

- 7-21** Aside from making reclaimed water available for reuse, the Districts have no control over present and future water supply, including groundwater extraction. The relationship between future groundwater extraction and surface flow is difficult to predict. 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.

No changes have been made to the Draft 2015 Plan and EIR.

- 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.

No changes have been made to the Draft 2015 Plan and EIR.

**Table 26-7-2  
1996 SCVJSS EFFLUENT CONCENTRATIONS VERSUS LIMITS**

CONSTITUENT	AVERAGE VALUES		RANGE OF VALUES		NPDES MAXIMUM LIMITATION	DRINKING WATER STANDARD
	SWRP	VWRP	SWRP	VWRP		
BOD <sub>5</sub> (mg/l)	8	4	8 - 12	2-5	45 <sup>a</sup> ,30 <sup>c</sup> ,20 <sup>d</sup>	
Suspended Solids (mg/l)	2	2	1-2	< 2-3	45 <sup>a</sup> ,40 <sup>c</sup> ,15 <sup>d</sup>	
Settleable Solids (ml/l)	< 0.1	< 0.1	< 0.1	< 0.1	0.3 <sup>a</sup> ,0.1 <sup>d</sup>	
Oil and Grease (mg/l)	< 1.6	< 1.0	< 1.0-2.9	< 1.0	15 <sup>a</sup> ,10 <sup>d</sup>	
Total Dissolved Solids (mg/l)	681	797	614-757	733-929	1000 <sup>a</sup>	1000 <sup>f</sup>
Chloride (mg/l)	110	135	92-132	116 - 178	190 <sup>a,b</sup>	500 <sup>f</sup>
Sulfate (mg/l)	151	187	119-181	140 - 273	400 <sup>a</sup>	500 <sup>f</sup>
Boron (mg/l)	1.02	0.92	0.95 - 1.20	0.77-1.07	1.5 <sup>a</sup>	
Fluoride (mg/l)	0.43	0.49	0.37 - 0.57	0.42-0.73	1.6 <sup>a</sup>	
Detergents [MBAS] (mg/l)	0.15	0.18	0.09-0.31	0.09-0.35	0.5 <sup>a</sup>	0.5 <sup>f</sup>
Coliform Group (MPN/100 ml)	< 1	< 1	< 1	1-2	2.2 <sup>c</sup>	
Nitrate+Nitrite Nitrogen (mg/l)	4.15	6.47	1.44-9.42	3.53-14.54	10 <sup>a</sup>	10 <sup>e</sup>
Turbidity (NTU)	1.2	1.4	1.0-1.6	1.3-1.6	2 <sup>d</sup>	5 <sup>f</sup>
pH	7.4	7	7.2-7.6	6.9-7.1	6.0-9.0	
Antimony (mg/l)	< 0.0005	0.002	< 0.0005	0.001-0.004	0.006 <sup>d</sup>	0.006 <sup>e</sup>
Arsenic (mg/l)	< 0.001	< 0.001	< 0.001-0.001	< 0.001-0.001	0.05 <sup>d</sup>	0.05 <sup>e</sup>
Barium (mg/l)	0.03	0.02	0.02-0.04	0.01-0.02	1 <sup>d</sup>	1 <sup>e</sup>
Beryllium (mg/l)	< 0.01	< 0.005	< 0.01	< 0.0005-< 0.01	0.004 <sup>d</sup>	0.004 <sup>e</sup>
Cadmium (mg/l)	< 0.003	< 0.003	< 0.003	< 0.003	0.005 <sup>d</sup>	0.005 <sup>e</sup>
Chromium [VI] (mg/l)	< 0.01	< 0.01	< 0.01	< 0.01	0.05 <sup>d</sup>	0.05 <sup>e</sup>
Iron (mg/l)	0.02	0.07	< 0.02-0.03	0.06-0.08	0.3 <sup>d</sup>	0.3 <sup>f</sup>
Lead (mg/l)	< 0.02	< 0.02	< 0.02	< 0.02	0.05 <sup>d</sup>	
Mercury (mg/l)	< 0.0001	< 0.0001	< 0.0001	< 0.0001	0.002 <sup>d</sup>	0.002 <sup>e</sup>
Nickel (mg/l)	< 0.02	< 0.02	< 0.02	< 0.02	0.1 <sup>d</sup>	0.1 <sup>e</sup>
Selenium (mg/l)	< 0.001	< 0.001	< 0.001	< 0.001	0.01 <sup>d</sup>	0.05 <sup>e</sup>
Silver (mg/l)	< 0.01	< 0.01	< 0.01	< 0.01	0.05 <sup>d</sup>	0.1 <sup>f</sup>
Zinc (mg/l)	0.04	0.04	0.04	0.03-0.05	5 <sup>d</sup>	5 <sup>f</sup>
Cyanide (mg/l)	< 0.01	< 0.01	< 0.01	< 0.01	0.0052 <sup>d</sup>	0.2 <sup>e</sup>
Endrin (µg/l)	< 0.01	< 0.01	< 0.01	< 0.01	2 <sup>d</sup>	2 <sup>e</sup>
Lindane (µg/l)	0.02	0.01	0.01-0.02	0.01	0.2 <sup>d</sup>	0.2 <sup>e</sup>
Methoxychlor (µg/l)	< 0.01	< 0.01	< 0.01	< 0.01	40 <sup>d</sup>	40 <sup>e</sup>
Toxaphene (µg/l)	< 0.5	< 0.5	< 0.5	< 0.5	3 <sup>d</sup>	3 <sup>e</sup>
2,4-D (µg/l)	< 3	< 1.7	< 0.50-< 6.00	< 0.5-< 5	70 <sup>d</sup>	70 <sup>e</sup>
2,4,5-TP [Silvex] (µg/l)	< 0.05	< 0.05	< 0.05-< 0.06	< 0.05-< 0.06	10 <sup>d</sup>	50 <sup>e</sup>
Tetrachloroethylene (µg/l)	< 0.3	< 1.6	< 0.3	< 0.3-3.9	5 <sup>d</sup>	5 <sup>e</sup>
Carbon Tetrachloride (µg/l)	< 0.3	< 0.3	< 0.3	< 0.3	0.5 <sup>d</sup>	0.5 <sup>e</sup>
1,1,1-Trichloroethane (µg/l)	< 0.5	< 0.5	< 0.5	< 0.5	200 <sup>d</sup>	200 <sup>e</sup>
p-Dichlorobenzene (µg/l)	< 0.5	< 0.6	< 0.5	< 0.05-< 0.07	5 <sup>d</sup>	5 <sup>e</sup>
Di[2-ethylhexyl]phthalate (µg/l)	< 2	3	< 2	< 1-16	4 <sup>d</sup>	4 <sup>e</sup>

- Notes: a) Maximum daily value.  
 b) For the Santa Clara River watershed, on January 27, 1997, an interim 190 mg/l chloride limit was set pending further study.  
 c) Maximum seven-day average value.  
 d) Maximum 30-day average value.  
 e) Primary maximum contaminant level (primary mcl).  
 f) Secondary maximum contaminant level (secondary mcl).

7-23 The current interim chloride standard is under review and the Districts will, as necessary, respond to any determinations made by the RWQCB. The resolution adopted by the RWQCB at their January 27, 1997, Board Meeting included special provisions for not only evaluation of appropriate chloride objectives, but also consideration of cost-effective means to protect waters for irrigation in the Santa Clara River watershed. Accordingly, the Districts have studied the costs involved with advanced treatment to reduce chloride concentrations in the SCVJSS effluent. In a January 16, 1997, letter to the RWQCB, the Districts indicated that the capital cost alone of providing such treatment would be over \$80 million and, therefore, economically prohibitive. Thus, at this point, it is premature to speculate as to the final conclusions of the study.

No changes have been made to the Draft 2015 Plan and EIR.

7-24 The total nitrogen levels observed at the different receiving water monitoring stations include nitrogen from SWRP, VWRP, and other natural and anthropogenic sources. Nitrate and ammonia are the main components of the total nitrogen being measured. The various nitrogen species can undergo multiple transformations or processes in the river (e.g. nitrification, ammonia volatilization, nitrogen uptake by plants, etc.). Since the concentrations of total nitrogen in the receiving waters can be as high as 10 mg/L, it would appear that there is a potential for nitrate to exceed the 10 mg/L drinking water standard, which appears to be the main concern. However, the multiple tributary water sources into the river and some of the processes listed above (e.g. volatilization and plant uptake) result in a net loss of nitrogen in the river water. Evidence of this is the decrease in nitrogen levels from receiving water monitoring station R-D to station R-E, where average levels of total nitrogen are under 9 mg/L. As such, the Districts consider that the health risks from total nitrogen in the river are negligible or minor. More importantly, the nitrification-denitrification process being considered will further reduce total nitrogen levels in receiving waters.

No changes have been made to the Draft 2015 Plan and EIR.

7-25 See Table 26-7-3 for maximum concentrations as well as average concentrations of relevant nitrogen compounds at each receiving water monitoring station. The location of each receiving water monitoring station is noted in Chapter 17. See also Table 26-7-2 that lists the average and range of concentrations for the discharges from the SWRP and VWRP.



**Table 26-7-3  
SANTA CLARA RIVER RECEIVING WATER MONITORING STATIONS  
1996 WATER QUALITY DATA FOR NITROGEN COMPOUNDS**

PARAMETER (mg/l - N)	R-B		R-C		R-D		R-E	
	AVG	MAX	AVG	MAX	AVG	MAX	AVG	MAX
Ammonia Nitrogen	9.9	14.8	1.72	8.22	9.12	16.60	4.75	8.31
Organic Nitrogen	0.9	1.5	0.4	0.7	0.8	1.0	0.6	1.1
Nitrate Nitrogen	5.39	8.53	4.56	5.00	7.21	9.21	4.92	5.63
Nitrite Nitrogen	1.20	2.20	0.14	0.30	0.83	1.45	1.26	1.76
Total Nitrogen	17.7	19.9	5.16	5.70	21.1	24.7	12.9	15.4

No changes have been made to the Draft 2015 Plan and EIR.

**7-26** See response to Comment 7-7.

No changes have been made to the Draft 2015 Plan and EIR.

**7-27** The locations of the groundwater sampling stations and the discharge points of the SWRP and VWRP are shown on Figure 26-7-1.

No changes have been made to the Draft 2015 Plan and EIR.

**7-28** The groundwater monitoring well for the SWRP is Well No. 4N/16W-16R1. The well is 244 feet deep and 18 inches in diameter. The pipe is perforated from 95 to 205 feet. The well is located approximately 500 feet north of the centerline of the North Fork of the Santa Clara River at the location shown on Figure 26-7-1.

The groundwater monitoring well for the VWRP is well no. 4N/17W-14Q2. The well is 148 feet deep and 20 inches in diameter. The pipe is perforated from 80 to 135 feet. The well is located approximately 1500 feet north of the centerline of the Santa Clara River approximately 2 miles downstream of the VWRP at the location shown on Figure 26-7-1.

No changes have been made to the Draft 2015 Plan and EIR.

**7-29** The statement is not inconsistent. Much of the Districts' effluent discharge percolates into the Piru Groundwater Basin. The Piru Groundwater Basin, however, is hydraulically connected with the downstream Fillmore and Santa Paula Basins. Thus, it is to be expected that any potential direct impacts to the Piru Groundwater Basin would have the potential to also indirectly impact the downstream basins.

No changes have been made to the Draft 2015 Plan and EIR.

- 7-30** The past elevated chloride levels in the water supply witnessed in the Santa Clarita Valley have mostly been attributed to elevated chloride levels in the SWP water. As drought conditions have passed, the chloride levels in the SWP have dropped with a corresponding reduction in the total water supply chloride levels. Furthermore, 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. Given the recent improvements in the SWP, the Districts believe that chloride levels will continue to be low, and increases during drought conditions should be less severe.

No changes have been made to the Draft 2015 Plan and EIR.

- 7-31** While it is understandable for United to consider recharge waters with chloride exceeding the current basin objectives to be significant impacts, 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 Santa Clara River watershed involves a complex hydrology, consisting of multiple tributaries with varying flow and water quality, as well as a continuous interaction between surface waters and groundwaters. Thus, the water being recharged into a groundwater basin is generally not at the same chloride concentration as the water discharged from the water reclamation plants. Instead, this water tends to be at much lower concentrations due to mixing with other sources of water (e.g. natural runoff, reservoir releases, rising groundwater, etc.). Historical data shows that chloride levels at the Freeman diversion have consistently been under 100 mg/L during this decade. Chloride levels at receiving water monitoring station R-E, which is only 2.5 miles downstream of VWRP, seldom exceed 110 mg/L. Thus, the impact by the SWRP and VWRP's effluent chloride levels on the groundwater basins does not appear to be significant. More importantly, the RWQCB has recently embarked on a study to determine new chloride objectives in the Santa Clara River. The study will involve a watershed approach that accounts for the hydrology of the river, the groundwater and the beneficial uses (e.g. agriculture) as they are affected by chloride discharges.

No changes have been made to the Draft 2015 Plan and EIR.

- 7-32** The impacts considered in this section are the potential impacts under the recommended project. As the recommended project includes provision for nitrogen removal through a nitrification-denitrification process, the potential nitrogen impact under the recommended project should, in fact, be considered a beneficial impact.

No changes have been made to the Draft 2015 Plan and EIR.

- 7-33** The Santa Clara River is almost always dry upstream of the SWRP discharge, hence no flow is usually observed at receiving water monitoring station R-A. Thus, nearly all flow in this reach of the Santa Clara River between the SWRP and VWRP is effluent discharged from the SWRP, making a comparison such as the one suggested impossible.

No changes have been made to the Draft 2015 Plan and EIR.

**7-34** The schedule planned by the Districts is the most expeditious one given the constraints. See response to Comment 7-7 for a complete discussion on the schedule for nitrification-denitrification.

No changes have been made to the Draft 2015 Plan and EIR.

**7-35** During the wet season, climatic conditions would moderate any effluent temperature effects, and storm water runoff would dilute any constituents in the effluent. Although the monthly average proportion of effluent at the Los Angeles/Ventura County line would increase from 21 percent to 33 percent in January and from 11 percent to 20 percent in February, there are significant tributary inflows between the VWRP and the confluence of Sespe Creek. The increased discharge resulting from implementing the project would not adversely affect the ability of steelhead to migrate to spawning areas in Sespe Creek. See response to Comment 7-11 regarding the gap in perennial flow downstream of the Los Angeles/Ventura County line.

No changes have been made to the Draft 2015 Plan and EIR.

Letter 8

SOUTHERN CALIFORNIA



ASSOCIATION OF GOVERNMENTS

September 2, 1997

Mr. Charles W. Carry  
Chief Engineer and General Manager  
County Sanitation Districts of Los Angeles County  
1955 Workman Mill Road  
Whittier, CA 90601-1400  
Attention: Habib Kharrat

RE: Comments on the Draft 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan and Draft Environmental Impact Report - SCAG No. 19700376

Dear Mr. Carry:

Thank you for submitting the Draft 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan and Draft Environmental Impact Report to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG assists cities, counties and other agencies in reviewing projects and plans for consistency with regional plans.

The attached detailed comments are meant as administrative comments to provide guidance for considering the proposed project within the context of our regional goals and policies. SCAG's policy level review will be initiated with the presentation of the proposed Draft 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan and Draft Environmental Impact Report Project to SCAG's Standing Committee on Implementation (SCI) on October 9, 1997 at 11:15 am at the SCAG office in Los Angeles. You are cordially invited to attend this meeting and answer any questions of the elected official members of the SCI. If you have any questions regarding the attached comments, please contact Bill Boyd at (213) 236-1960. He will be contacting you with further information concerning this SCI meeting.

Sincerely,

DAVID STEIN  
Manager, Performance Assessment and Implementation

097 SEP -3 AM 9:38

Mr. Charles W. Carry  
September 2, 1997  
Page 2

COMMENTS ON THE  
COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY  
DRAFT 2015 SANTA CLARITA VALLEY JOINT SEWERAGE SYSTEM  
FACILITIES PLAN & DRAFT ENVIRONMENTAL IMPACT REPORT

PROJECT DESCRIPTION

County Sanitation Districts Nos. 26 and 32 of Los Angeles County (Districts) have prepared a draft facilities plan and associated Draft Environmental Impact Report (DEIR) to meet the wastewater management needs of the Districts' Santa Clarita Valley Joint Sewerage System (SCVISS). The SCVISS currently serves approximately 150,000 residents in the north Los Angeles County area. The draft 2015 Plan, addresses the need to expand the system's Valencia Water Reclamation Plant (VWRP) in order to accommodate projected growth through the year 2015 and to provide for biosolids management and water reuse opportunities. The 2015 Plan also addresses the need to upgrade the level of treatment at the Valencia (VWRP) and Saugus (SWRP) Water Reclamation Plants through the addition of nitrification-denitrification facilities.

The SCVISS 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 SCAG population projections and forecasts of industrial and contracted flow through the planning horizon. According to these flow projections, the system's current 19.1 MGD capacity will be exceeded in 1999. The recommended project provides for sewerage service to a population of approximately 321,000 in 2015. This population, along with the associated industrial/commercial and contracted flows, will generate 34.2 MGD of wastewater flow that must be accommodated by SCVISS facilities. 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.

All wastewater received at existing SCVISS facilities is treated to tertiary standards and the effluent is discharged into the Santa Clara River. Tertiary treatment is required to comply with NPDES permits and meet water quality standards. In addition, upgrade of existing and new facilities will be required for reduction of ammonia in receiving waters to meet requirements of the Los Angeles Regional Water Quality Control Board's Basin Plan, to protect fish and other aquatic life.

The recommended Project which is addressed in the DEIR includes:

- VWRP Stage V Expansion: 9 MGD expansion on the southern portion of the site.
- VWRP Stage VI Expansion: 6 MGD expansion on the north parcel.
- SWRP and VWRP Upgrade: Modification of existing facilities to include nitrification-denitrification.

The capital cost of the recommended Project is \$61 million, with annual operating and maintenance costs estimated at \$6.6 million and an equivalent annual cost of \$11.5 million. The estimated single family home would pay \$6 per year additionally for capital and operating costs.

The following alternatives were evaluated before a decision was made to go with the recommended Project:

C.W. CARRY

Office: 11000 Wilshire Blvd., Suite 1000, Beverly Hills, CA 90210  
County of Imperial: San Diego, Imperial Counties  
County of Los Angeles: Burbank, Redlands, Rosemead, San Gabriel, San Marino, Azusa, Fontana, Fullerton, Glendale, Industry, La Habra, Long Beach, Orange, Oxnard, Pomona, San Juan Capistrano, San Ramon, Tustin, West Covina, Westminster, Yorba Linda  
County of Orange: Fullerton, Orange, Santa Ana, Tustin  
County of Riverside: Corona, Norwalk, Orange, San Juan Capistrano  
County of San Bernardino: Redlands, Rosemead, San Gabriel, San Marino, Azusa, Fontana, Fullerton, Glendale, Industry, La Habra, Long Beach, Orange, Oxnard, Pomona, San Juan Capistrano, San Ramon, Tustin, West Covina, Westminster, Yorba Linda  
County of Ventura: Santa Barbara, Ventura

- Expansion of the VWRP.
- Expansion of the SWRP.
- Construction of an Additional WRP.
- Process Modifications of the SCVJSS Facilities.
- No Project

**INTRODUCTION TO SCAG REVIEW PROCESS**

The document that provides the primary reference for SCAG's project review activity is the Regional Comprehensive Plan and Guide (RCPG). The RCPG chapters fall into three categories: core, ancillary, and bridge. The Growth Management (adopted June 1994), Regional Mobility (adopted June 1994), Air Quality (adopted October 1995), Hazardous Waste Management (adopted November 1994), and Water Quality (adopted January 1995) chapters constitute the core chapters. These core chapters respond directly to federal and state planning requirements. The core chapters constitute the base on which local governments ensure consistency of their plans with applicable regional plans under CEQA. The Air Quality and Growth Management chapters contain both core and ancillary policies, which are differentiated in the comment portion of this letter. The Regional Mobility Element (RME) constitutes the region's Transportation Plan. The RME policies are incorporated into the RCPG.

Ancillary chapters are those on the Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Energy, and Integrated Solid Waste Management. These chapters address important issues facing the region and may reflect other regional plans. Ancillary chapters, however, do not contain actions or policies required of local government. Hence, they are entirely advisory and establish no new mandates or policies for the region.

Bridge chapters include the Strategy and Implementation chapters, functioning as links between the Core and Ancillary chapters of the RCPG.

Each of the applicable policies related to the proposed project are identified by number and reproduced below in italics followed by SCAG staff comments regarding the consistency of the project with those policies.

**Consistency With Regional Comprehensive Plan and Guide Policies**

1. *The Growth Management Chapter (GMC)* of the Regional Comprehensive Plan contains a number of policies that are particularly applicable to this Specific Plan.

**a. Core Growth Management Policies**

3.01 *The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.*

**SCAG staff comments.** As SCAG has designated subregions, the project is situated in the North Los Angeles County subregion. The Joint Sewerage System Facilities Plan in Chapter 5 (Existing and Projected Water and Wastewater Characteristics) and the Draft EIR in Chapter 22 (Population, Employment and Housing) acknowledges that the Project is based on and consistent with SCAG population forecasts in the 1994 Regional Comprehensive Plan and Guide and the Draft SCAG 96 forecasts. A detailed analysis of the methodology used to disaggregate SCAG's population for to the SCVJSS service area

8-1

is presented on pages 5-8 through 5-16 of the Joint Sewerage System Facilities Plan. This analysis also utilizes SCAG's employment forecasts to refine the generation rates used to design treatment plant facilities. The per capita generation rates were adjusted to reflect the three percent of the SCVJSS population that currently uses septic tanks for wastewater disposal. The Project is consistent with this core RCPG policy.

8-1

3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

**SCAG staff comments:** The Joint Sewerage System Facilities Plan in Chapter 5 (page 5-16 and Figures 5-5 and 5-6) address the relationship of SCVJSS trunk sewers to SCAG population projections. The Facilities Plan in Chapter 7 (pages 7-6 through 7-8) appropriately addresses the timing, financing and location of proposed wastewater treatment facilities and trunk sewers. The Project is consistent with this core RCPG policy.

8-2

**b. Ancillary Growth Management Policies**

3.05 *Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.*

**SCAG staff comments.** The Project supports existing and planned development to accommodate growth projections as defined by the City of Santa Clarita General Plan, the Joint Sewerage System Facilities Plan and SCAG's RCPG. Furthermore, the Project supports the planned logical expansion of the existing wastewater treatment plants, thus making for better use of these facilities. The Project is supportive of this ancillary RCPG policy.

8-3

3.09 *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*

**SCAG staff comments:** The Joint Sewerage System Facilities Plan appropriately addresses the matter of minimizing the cost of sewerage collection (trunk sewers) and wastewater treatment infrastructure and the funding of these facilities and services. See reference in the Project Description and in SCAG staff comments on RCPG policy 3.03. The Project is supportive of this ancillary RCPG policy.

8-4

3.18 *Encourage planned development in locations least likely to cause adverse environmental impact.*

**SCAG staff comments.** The Draft EIR acknowledges that the Project is designed in a manner, or includes appropriate mitigation measures, which addresses adverse environmental impacts. Of specific note, the Draft EIR in Chapter 23 (Cumulative, Growth-Inducing and Growth-Related Impacts) includes a number of mitigation measures which are specifically tied to SCAG RCPG and Santa Clarita General Plan goals and policies regarding land use, geologic hazards and soils, energy, transportation, air quality, noise, aesthetics, hydrology, water quality, biological resources, public health, public services and facilities and cultural resources. The Project is supportive of this ancillary RCPG policy.

8-5

3.19 *Support policies and actions that preserve open space areas identified in local, state, and federal plans.*

**SCAG staff comments.** The Draft EIR on page 23-10 includes Mitigation Measure 23-18 to "Implement Local Agency and SCAG Parks and Recreation Programs" that will help preserve local and regional open space, especially the Santa Clara River corridor. Mitigation measures 23-9 through 23-12 address the implementation of local agency, Regional Water Quality Control Board and SCAG policies and programs related to hydrology, water quality and biological resources. These measures also will assist in the preservation of open space areas identified in local, state and federal plans. The Project is supportive of this ancillary RCPG policy.

- 3.20 Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.

**SCAG staff comments.** The Draft EIR identifies a number of Project design features and specific mitigation measures (including those referenced in SCAG staff comments on RCPR ancillary policy 3.19) that will support the protection of wetlands, groundwater resources and land containing unique and endangered plants and animal species. The Project is supportive of this ancillary RCPG policy.

- 3.21 Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.

**SCAG staff comments.** The Draft EIR in Chapter 21 (Cultural Resources) acknowledges that no known cultural resources are impacted by the proposed Project. Mitigation measure 23-20 also addresses the matter of cultural resources and support of this SCAG policy. The project is supportive of this ancillary RCPG policy.

- 3.23 Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.

**SCAG staff comments.** The Draft EIR identifies mitigation measures that address these areas, specifically Measures 23-3 (Seismic and Geologic Hazards), 23-7 (Noise), and 23-11 and 23-12 (Biological Resources). The Project is supportive of this ancillary RCPG policy.

- 2. The Air Quality Chapter (AQC) core actions that are generally applicable to the Project are as follows:

- 5.11 Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.

**SCAG staff comments.** The Draft EIR in Chapter 13 (Air Quality) appropriately addresses air quality considerations and notes that mitigation measures are only needed for construction impacts. Land use and economic issues associated with treatment plant expansion or outfall construction are also addressed in the Draft EIR. The Project is consistent with this RCPG policy.

- 3. The Water Quality Chapter (WQC) core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters. The core recommendations and policy options that are particularly

8-6

8-7

8-8

8-9

8-10

applicable to the Project include the following:

- 11.02 Encourage "watershed management" programs and strategies, recognizing the primary role of local governments in such efforts.

**SCAG staff comments:** The Draft EIR in Chapter 16 (Hydrology), Chapter 17 (Water Quality) and Chapter 18 (Biological Resources) appropriately references the relationship of the Project to the 1994 Water Quality Control Plan for the Santa Clara River Basin (the Basin Plan) and the involvement of local governments in this planning and watershed management effort. Furthermore, the Draft EIR includes a specific mitigation measure (Measure 23-10) that acknowledges the responsibility of the Districts 26 and 32 (JPA) to implement this SCAG policy; 17 water quality policies in the City of Santa Clarita General Plan; and all applicable policies of the Regional Water Quality Control Board. The Project is consistent with this core RCPG policy.

- 11.03 Coordinate watershed management planning at the subregional level by (1) providing consistent regional data; (2) serving as a liaison between affected local, state, and federal watershed management agencies; and (3) ensuring that watershed planning is consistent with other planning objectives (e.g., transportation, air quality, water supply).

**SCAG staff comments:** The Draft EIR in Chapter 12 (Transportation), Chapter 13 (Air Quality), Chapter 16 (Hydrology), Chapter 17 (Water Quality) and Chapter 18 (Biological Resources) appropriately references the coordinated watershed planning and management effort. Furthermore, the Draft EIR includes a specific mitigation measure (Measure 23-10) that acknowledges the responsibility of the Districts 26 and 32 (JPA) to implement this SCAG policy; 17 water quality policies in the City of Santa Clarita General Plan; and all applicable policies of the Regional Water Quality Control Board. The County Sanitation Districts of Los Angeles County (CSDLAC) has undertaken extensive public participation and coordination activities (as documented in Chapter 25 of the Draft EIR), to ensure that the watershed planning effort addresses varying concerns at the local, state and federal level. The Project is consistent with this core RCPG policy.

- 11.05 Support regional efforts to identify and cooperatively plan for wetlands to facilitate both sustaining the amount and quality of wetlands in the region and expediting the process for obtaining wetlands permits.

**SCAG staff comments:** The Draft EIR in Chapter 17 (Water Quality) and Chapter 18 (Biological Resources) appropriately addresses the preservation and restoration of wetlands within the Santa Clara River basin, including the mitigation of adverse impacts. Furthermore, the Draft EIR includes a specific mitigation measure (Measure 23-10) that acknowledges the responsibility of Districts 26 and 32 (JPA) to implement this SCAG policy and 17 water quality policies in the City of Santa Clarita General Plan. The Project is consistent with this core RCPG policy.

- 11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.

**SCAG staff comments:** The Draft EIR acknowledges that the CSDLAC has worked closely with the Castaic Lake Water Agency on the development of a Reclaimed Water System Master Plan for the Santa Clarita Valley. Efforts are underway amongst various agencies, including the City of Santa Clarita, to ensure markets for recycled water which will be available from CSDLAC WRPs. The proposed Project design will result in improved

8-11

8-12

8-13

8-14

quality of reclaimed water, as noted on pages 17-8 and 17-9 of the Draft EIR. Furthermore, the Draft EIR includes a specific mitigation measure (Measure 23-10) that acknowledges the responsibility of Districts 26 and 32 (JPA) to implement this SCAG policy and 17 water quality policies in the City of Santa Clarita General Plan. The Project is consistent with this core RCPG policy.

8-14

- 11.08 *Ensure wastewater treatment agency facility planning and facility development be consistent with population projections contained in the RCPG, while taking into account the need to build wastewater treatment facilities in cost-effective increments of capacity, the need to build well enough in advance to reliably meet unanticipated service and storm water demands, and the need to provide standby capacity for public safety and environmental protection objectives.*

**SCAG staff comments:** See previous SCAG staff comments on RCPG policy 3.01. Furthermore, the Draft EIR includes a specific mitigation measure (Measure 23-10) that acknowledges the responsibility of Districts 26 and 32 (JPA) to implement this SCAG policy. The Project is consistent with this core RCPG policy.

8-15

Five actions are proposed in the Water Quality Chapter (see the following italicized paragraphs) which establish a framework for addressing wastewater treatment facility plans and their consistency with growth forecasts in the most recently adopted RCPG. These actions should be followed to help resolve any apparent conflicts between wastewater facility plans and regional growth forecasts.

*Ensuring that wastewater capacity planning and development is consistent with SCAG's population projections serves two important goals. First, it ensures that adequate treatment capacity exists to manage the region's waste thereby serving an important clean water objective. One of the primary purposes of the Clean Water Act Section 208 planning process is to ensure that adequate and environmentally beneficial treatment capacity will be available to meet the demands of a growing Southern California population. Without such capacity, improperly treated wastewater will contribute to poor water quality in the region.*

*Second, consistency between wastewater capacity expansion and population projections helps ensure that increases in capacity do not unnecessarily out pace projections of future population and development. Capacity expansions may serve as an inducement to development and growth in a manner that is contrary to the region's air quality goals. EPA recognized this is the federal Clean Air Act. Section 316 of the Act gives EPA the authority to withhold grants for sewage treatment works construction if such construction does not conform with the region's air quality plan. In addition, Section 176 of the Act prohibits any federal agency from providing financial assistance, licensing, permitting or approving any activity that does not conform with a region's air plan. However, if this is so interpreted to interfere with a public wastewater treatment agency subject to federal conformity requirements ability to conduct its master planning efforts to proactively build needed facilities, then this becomes a classic example of contradictory public policy.*

*While it is certainly important to meet air quality objectives in this region, it is equally important that wastewater treatment agencies meet their objectives of protecting public health and the environment. This can only be done by proactively constructing the facilities necessary to meet the objectives of the Clean Water Act, a 208 Plan, a comprehensive watershed management plan or the stated policy objectives of a public wastewater treatment agency. For this reason, it is the stated policy of SCAG to encourage and support those wastewater facilities planning and construction efforts that are intended to proactively address service, reliability and environmental demands.*

*In compliance with SCAG's updated Intergovernmental Review Procedures guidelines, consistency determinations are conducted for specific facilities. In its reviews, SCAG will take into account other considerations such as the need to build wastewater treatment facilities in cost-effective increments of capacity, the need to build well enough in advance to reliably meet unanticipated service and stormwater demands, and the need to provide standby capacity for public safety and environmental protection objectives. By taking a balanced view of wastewater treatment facilities planning and construction, SCAG acknowledges that federal, state, or regional mandates for achieving clean air objectives are equally important with the competing federal, state or regional mandates to achieve clean water objectives and to meet the long-term service demands of the community served by wastewater treatment facilities.*

*In light of the general federal conformity requirements for actions on waste water treatment projects<sup>1</sup>, as well as the need to have a region-wide process for ensuring appropriate wastewater capacity growth, SCAG is proposing the following actions. Consistent with the philosophy underlying the RCPG, this process emphasizes cooperative efforts between local agencies (i.e., wastewater treatment facilities) and SCAG<sup>2</sup>. Under this process, SCAG will allocate its growth projections by each wastewater treatment service area in the region and work cooperatively with wastewater treatment agencies to ensure that facility plans are consistent with such growth projections. Such an effort is designed to minimize the need for conformity review for specific projects.*

*The following actions are proposed:*

- 1. Upon adoption of this chapter, SCAG, after consultation and in conjunction with local governments and wastewater treatment agencies within the sub-regions, will allocate the growth projections contained in the Growth Management Chapter of the RCPG by the service area of each wastewater treatment agency in the SCAG region. SCAG will seek to ensure wastewater treatment agency facility planning and facility development are consistent with population projections contained in the RCPG, while taking into account the need to build wastewater treatment facilities in cost-effective increments of capacity, the need to build well enough in advance to reliably meet unanticipated service and stormwater demands, and the need to provide standby capacity for public safety and environmental protection objectives.*
- 2. SCAG, in conjunction with wastewater treatment agencies in the region, will review existing facility plans to ensure that the population, housing, and employment projections underlying these plans are consistent with the SCAG-adopted projections.*
- 3. In instances in which wastewater treatment facility plans are not consistent with SCAG-adopted growth projections, SCAG will work with such agencies to either: 1) modify facility plans to conform with the growth projections, or 2) reevaluate the growth projections for the wastewater treatment agency service area, or 3) both.*

<sup>1</sup>Federal General Conformity Rule §51.857 (a)(5)(v) Determining Conformity - Where the action involves regional water and/or wastewater projects, such projects are sized to meet only the needs of population projections that are in the applicable SIP.

<sup>2</sup>The conformity process will be described in detail during the Plan implementation.

4. Facility plans found to be consistent with the SCAG-adopted population projections will be incorporated into the Water Quality component of the Regional Comprehensive Plan and Guide. For those facility plans adopted by the governing board of a wastewater treatment agency that are inconsistent with the SCAG-adopted population projections, SCAG, in consultation with the local governments of the sub-region, will use the dispute mediation process and procedure.
5. Working with their local governments, wastewater treatment agencies would be responsible for the timing and sizing of the wastewater treatment facilities with oversight of State and Federal permitting and funding agencies.

**SCAG staff comments:** As the previous SCAG staff comments on RCPG policies 3.01, 3.03 and 11.08 note, the CSDLAC has worked closely with SCAG in coordinating its planning for the SCVJSS with SCAG forecasts and has appropriately addressed the five above actions.

8-16

#### **Consistency with the 208 Plan for the South Coast Planning Area**

Under Section 208 of the Clean Water Act, SCAG prepared the Areawide Waste Treatment Management Plan for the South Coast Planning Area in 1979 and made amendments to the plan in 1981. SCAG has been precluded from updating the plan due to lack of federal or state funds. The State Water Resource Control Board has not funded SCAG's updating of the 208 Plan for the South Coast Planning area. The growth forecasts on which the 208 plan was based and many of the plan's policies and actions are dated.

**SCAG staff comments:** As previously noted, the Project is consistent with SCAG's adopted population forecasts. These forecasts, however, have not been incorporated into the 208 Plan for the South Coast Planning Area. Furthermore, the facilities proposed in the Draft 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan have not been incorporated into the 208 Plan. SCAG is unable to make a finding that the Project is consistent with the 208 Plan for the South Coast Planning Area.

8-17

#### **Conformity With The State Implementation Plan for the South Coast Air Basin**

A "General Federal Action" is any activity engaged in, supported, or allowed by the Federal Government other than transportation plans, programs and projects developed, funded or approved under Title 23 of the United States Code. Although the Federal Government, rather than SCAG, is primarily responsible for making conformity determinations for general federal actions, their conformity analyses must be based on the latest planning assumptions derived from population, employment, travel and congestion estimates approved by SCAG. Any revisions to these estimates used as part of the conformity determination must be approved by SCAG. SCAG's most growth forecasts were adopted in June 1994. SCAG's new growth forecasts are scheduled for adoption in early 1997. Additionally, a Federal agency making a conformity determination for a general federal action must notify SCAG after making its draft and final conformity determination of the action.

**SCAG staff comments:** The Draft 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan includes wastewater treatment facilities that may require a federal action, and as such would be subject to a finding of air quality conformity.

8-18

#### **CONCLUSIONS AND RECOMMENDATIONS:**

- (1) As noted in the staff comments, the Draft 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan and Draft Environmental Impact Report is consistent with or supports many of the policies in the Regional Comprehensive Plan and Guide. 8-19
- (2) For the reasons stated herein, SCAG is unable to make a finding that the Project is consistent with the 208 Plan for the South Coast Planning Area. 8-20
- (3) All mitigation measures associated with the project should be monitored in accordance with AB 3180 requirements and reported to SCAG through the Annual Reasonable Further Progress Reports. 8-21



SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

*Roles and Authorities*

THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS is a *Joint Powers Agency* established under California Government Code Section 6502 et seq. Under federal and state law, the Association is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). Among its other mandated roles and responsibilities, the Association is:

- Designated by the federal government as the Region's *Metropolitan Planning Organization* and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. §134(g)-(h), 49 U.S.C. §1607(f)-(g) et seq., 23 C.F.R. §450, and 49 C.F.R. §613. The Association is also the designated *Regional Transportation Planning Agency*, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080.
- Responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the *South Coast Air Quality Management Plan*, pursuant to California Health and Safety Code Section 40460(b)-(c). The Association is also designated under 42 U.S.C. §7504(a) as a *Co-Lead Agency* for air quality planning for the Central Coast and Southeast Desert Air Basin District.
- Responsible under the Federal Clean Air Act for determining *Conformity of Projects, Plans and Programs* to the State Implementation Plan, pursuant to 42 U.S.C. §7506.
- Responsible, pursuant to California Government Code Section 65089.2, for *reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans* required by Section 65080 of the Government Code. The Association must also evaluate the consistency and compatibility of such programs within the region.
- The authorized regional agency for *Inter-Governmental Review* of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).
- Responsible for reviewing, pursuant to Sections 15125(b) and 15206 of the CEQA Guidelines, *Environmental Impact Reports* of projects of regional significance for consistency with regional plans.
- The authorized *Area-wide Waste Treatment Management Planning Agency*, pursuant to 33 U.S.C. §1288(a)(2) (Section 208 of the Federal Water Pollution Control Act)
- Responsible for preparation of the *Regional Housing Needs Assessment*, pursuant to California Government Code Section 65584(a).
- Responsible (along with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council) for preparing the *Southern California Hazardous Waste Management Plan* pursuant to California Health and Safety Code Section 25135.3.

## Response to Comments From Southern California Association of Governments

### 8-1 to 8-10

Comment noted.

No changes have been made to the Draft 2015 Plan and EIR.

### 8-11 to 8-15

SCAG has misconstrued Mitigation Measure 23-10; Mitigation Measure 23-10 does not acknowledge the responsibility of Districts Nos. 26 and 32 to implement policies of SCAG, the City of Santa Clarita, and the Regional Water Quality Control Board as identified in the measure. As stated on pages 23-1 and 23-3, implementation of the mitigation measures to reduce impacts associated with growth is the responsibility of public agencies other than the Districts that have adopted or should adopt such mitigation measures (CEQA Section 1509[2]).

No changes have been made to the Draft 2015 Plan and EIR.

### 8-16

Comment noted.

No changes have been made to the Draft 2015 Plan and EIR.

### 8-17

Comment noted. However, the Areawide Waste Treatment Management Plan (208 Plan) on page 2-44 under *Continuing Planning Needs*, item 2, states that changes in flow forecasts will be made without formal amendment of the 208 Plan, provided such changes are approved by the designated agency and the SWRCB. The forecasts used in the Draft 2015 Plan and EIR are approved by SCAG and the SWRCB. Therefore, the Districts are consistent with policies and actions proposed in the 208 Plan.

Although the 208 Plan for the South Coast Planning Area has not been updated since 1981, it should be noted that the Draft 2015 Plan and EIR are still consistent with Action Nos. 15, 18, and 19 specified in the 208 Plan which are to be carried out by the Districts. The Actions stated are as follows:

15. *Plan, design and construct the facilities necessary to meet the municipal waste treatment system needs shown in the SWRCB Clean Water Grant Project Priority List, consistent with the adopted areawide growth forecasts.*
18. *Plan, design and construct wastewater facilities consistent with the Air Quality Management Plan (AQMP). This consistency will be achieved by use of the adopted growth forecast policy.*
19. *In the preparation of the environmental impact reports and statements (EIRs and EIS) for municipal (publicly-owned) wastewater facilities, specify tactics and strategies adopted as part of the Air*

*Quality Management Plan, or substitute tactics of equal effectiveness, as mitigation measures for air quality impacts.*

The above Actions are based on policies outlined on pages 2-36 and 2-46 of the 208 Plan and are consistent with the Draft 2015 Plan and EIR.

No changes have been made to the Draft 2015 Plan and EIR

**8-18** Comment noted. The federal conformity determination discussion is included on page 13-12 in the EIR.

No changes have been made to the Draft 2015 Plan and EIR.

**8-19** See responses to Comment 8-1 through 8-16.

No changes have been made to the Draft 2015 Plan and EIR.

**8-20** See response to Comment 8-17.

No changes have been made to the Draft 2015 Plan and EIR.

**8-21** As outlined in Chapter 24, the Districts intend to monitor the mitigation measures associated with the proposed project in accordance with AB 3180 requirements. AB 3180 does not, however, require the Districts to report to SCAG through the Annual Reasonable Further Progress Reports.

No changes have been made to the Draft 2015 Plan and EIR.

Letter 9



**NEWHALL COUNTY  
WATER DISTRICT**

23780 North Pine Street  
P.O. Box 220670  
Santa Clarita, California 91322-0670  
Telephone (805) 258-3818  
Fax (805) 258-0873

**Directors**  
EDWIN A. DUNN, President  
DAVID S. RAPOPORT, Vice President  
MICHAEL A. KOTCH  
LYNNE A. PLAMBECK  
DICK A. UNGER

**General Manager**  
Interim

**Secretary - Auditor**  
KARIN J. RUSSELL

**Attorney**  
H. JESS SENECAI

September 2, 1997

Mr. Charles W. Carry  
County Sanitation Districts of Los Angeles  
1955 Workman Mill Road  
Whittier, California 90601-1400

Attention: Habib Kharrat

RE: 2015 Santa Clarita Valley Joint Sewerage System Facilities  
Plan and EIR (SCH No. 96041084)

Dear Mr. Carry:

Newhall County Water District (N.C.W.D.) has reviewed the referenced draft EIR. The proposed improvements to the Saugus and Valencia water reclamation plants and changes in discharge volumes do not appear to affect any existing facilities operated by NCWD.

Although the proposed project does not appear to affect the District's existing facilities, the District is concerned about the summary dismissal of a project alternative that would establish a new treatment plant at a location more advantageous to the end users for the reclaimed water product. Considering the stated Sanitation District planning objective to optimize opportunities for water reuse (page 6-3) and the N.C.W.D.'s own reclamation plans (page 16-7), the N.C.W.D. Board of Directors requests that the facilities plan and EIR be revised to evaluate permitting considerations, operational factors (both for reclamation and accommodation of Saugus plant overflow), and environmental impacts associated with an alternate site located in the general vicinity of Soledad Canyon Road and Sierra Highway.

We appreciate the opportunity to review the EIR and look forward to reviewing the final EIR. Future cooperative efforts involving beneficial use of plant effluent for reclamation purposes are a high priority with Newhall County Water District, please do not hesitate to call if additional information is needed in preparing your response.

Sincerely yours,

NEWHALL COUNTY WATER DISTRICT

*Thomas E. Shollenberger*  
Thomas E. Shollenberger  
Interim General Manager

TES:incm

N.C.W.D. FILE # 97-0061

SEP 5 1997

9-1

## **Response to Comments From Newhall County Water District**

- 9-1 See Chapter 6 of the 2015 Plan regarding expansion of the SWRP and response to Comment 6-3 in the City of Santa Clarita Letter (Letter No. 6) regarding siting of a new WRP.

Letter 10

SEP-03-1997 09:12

RMA PLANNING

805 654 2509 P.01

SEP-03-1997 09:12

RMA PLANNING

805 654 2509 P.02

RESOURCE MANAGEMENT AGENCY  
**county of ventura**

THOMAS BERG  
Agency Director



PUBLIC WORKS AGENCY  
TRANSPORTATION DEPARTMENT  
Traffic and Planning & Administration

**MEMORANDUM**  
August 13, 1997

AUG 15 1997

Wednesday, September 03, 1997

1997 SEP - 3 11 10:30

Charles W. Carry  
County of L.A. Sanitation Dists.  
FAX 562-699-5422

Subject: Santa Clarita Valley Sewer Pln 2015

Dear Mr. Carry:

Thank you for the opportunity to review the subject documents. These notices were circulated for review. The responses are attached. Please forward your reply to our comments as appropriate.

Please call Kim Hocking if you have questions and he will direct you to the appropriate person, 805-654-2414.

Yours truly,

*Thomas Berg*  
Thomas Berg, Director

Reference No. 97-51

cc: Trigg, PWA - L#1600

Attachment

Government Center, Hall of Administration, LB1700  
800 S. Victoria Ave., Ventura, Ca. 93009 (805) 654-2861 FAX 646-9212

**TO:** Resource Management Agency, Planning Division  
Attention: Kim Hocking

**FROM:** Robert B. Brownie, Principal Engineer *ADD*

**SUBJECT:** Review of Document 97-51  
Draft 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan  
and Draft Environmental Impact Report  
Santa Clarita Valley Joint Sewerage System (SCVISS)  
County Sanitation Districts of Los Angeles County

The Transportation Department did not receive a copy of the subject Draft 2015 Santa Clarita Joint Sewerage System Facilities Plan and Draft Environmental Impact Report for the Santa Clarita Valley Joint Sewerage System as proposed by the County Sanitation Districts of Los Angeles County to review.

10-1

However, we do not anticipate that this project will have a significant impact on the Ventura County Regional Road Network and would therefore be consistent with the Ventura County General Plan transportation policies unless the system encourages additional development and subsequently traffic that might impact Ventura County. This should be clarified in the EIR.

10-2

Our review of this project is limited to the impacts this project may have on the County's Regional Road Network.

Please call me at extension 2080 with questions.

c: Richard Herrera  
Duane Flaten  
Carole Trigg

RBB/RH/DRF:m  
97-51.mmm

C.W. CARRY

## **Response to Comments From County of Ventura, Resource Management Agency/Public Works Agency, Transportation Department**

---

**10-1** Comment noted. The Districts sent two copies of the Draft 2015 Plan and EIR to the County of Ventura, Resource Management Agency.

No changes have been made to the Draft 2015 Plan and EIR.

**10-2** The recommended project is designed to *accommodate* locally approved growth as identified in the SCAG 96 forecast, and does not encourage additional development as discussed in Chapter 23 of the Draft 2015 Plan and EIR. Consequently, the recommended project is considered to be consistent with the Ventura County General Plan transportation policies.

No changes have been made to the Draft 2015 Plan and EIR.

Letter 11

COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90083-3294

(213) 881-2481



P. MICHAEL FREEMAN  
FIRE CHIEF  
FORESTER & FIRE WARDEN

September 17, 1997

Mr. Charles W. Carry  
Chief Engineer and General Manager  
County Sanitation District of Los Angeles County  
1955 Workman Mill Road  
Whittier, CA 90601-1400

Dear Mr. Carry:

**SUBJECT: ENVIRONMENTAL IMPACT REPORT - (SANTA CLARITA)  
DRAFT 2015 SANTA CLARITA VALLEY JOINT SEWERAGE SYSTEM  
FACILITIES PLAN AND DRAFT EIR - (RIR 0458/1997)**

The Draft 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan and Draft Environmental Impact Report, located in Districts Number 26 and 32 in the City of Santa Clarita have been reviewed by the Engineering, Planning and Forestry Divisions of the County of Los Angeles Fire Department. The following are their comments:

The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.

Commercial, multiple residential fire flows shall be 5,000 gallons per minute at 20 pounds per square inch residual pressure for a five-hour duration. Final fire flow will be based on the size of the building, its relationship to other structures and property lines, and the type of construction used. Specific fire and life safety requirements for the construction phases will be addressed at the plan check stage.

All on-site driveways shall provide a minimum unobstructed width of 26 feet clear to the sky to within 150 feet of all portions of the exterior walls of the first story of any building.

The minimum width of 26 feet shall be increased as indicated when any of the following conditions exist for commercial/industrial development:

**26 feet:** When buildings are more than three stories in height or 35 feet in height above ground level. The centerline of the access roadway shall be located parallel to and within 30 feet of the exterior wall on one side of the proposed structure.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF

- |              |             |                      |            |                      |                       |                  |
|--------------|-------------|----------------------|------------|----------------------|-----------------------|------------------|
| AGOURA HILLS | CALABASAS   | GLENDORA             | LAKEWOOD   | NORWALK              | ROLLING HILLS ESTATES | WALNUT           |
| ARTESIA      | CARSON      | HAWAIIAN GARDENS     | LA BARRACA | PALMDALE             | ROSEMEAD              | WEST HOLLYWOOD   |
| AZUSA        | CERRITOS    | HAWTHORNE            | LANCASTER  | PALOS VERDES ESTATES | SAN DIMAS             | WESTLAKE VILLAGE |
| BALDWIN PARK | CLAREMONT   | HIDDEN HILLS         | LA PUENTE  | PARAMOUNT            | SANTA CLARITA         | WHITTIER         |
| BELL         | COMMERCE    | HUNTINGTON PARK      | LAWDALE    | PICO RIVERA          | SIGNAL HILL           |                  |
| BELLFLOWER   | CUDAHY      | INDUSTRY             | LOMITA     | POMONA               | SOUTH EL MONTE        |                  |
| BELL GARDENS | DIAMOND BAR | IRWINDALE            | MALIBU     | RANCHO PALOS VERDES  | SOUTH GATE            |                  |
| BRADBURY     | DUARTE      | LA CANADA FLINTRIDGE | MAYWOOD    | ROLLING HILLS        | TEMPLE CITY           |                  |

1597 SEP 18 AM 10:20

Mr. Charles W. Carry  
September 17, 1997  
Page 2

**34 feet:** When parallel parking is allowed on one side on the access roadway/driveway. Preference is that such parking is not adjacent to the structure.

11-3

**42 feet:** When parallel parking is allowed on both sides of the proposed access roadway/driveway, in order to ensure the clear width of 26 feet.

All driveways shall be labeled as "Fire Lane" on the final building plans. Labeling is necessary to ensure access for Fire Department use.

11-4

Additional fire life safety requirements will be addressed at building plan check. Fire Department requirements for access, fire flow and hydrants are addressed at the Los Angeles County Subdivision Committee meeting when approval for tentative subdivision maps are considered.

11-5

Should any questions arise regarding engineering and/or water and access, please feel free to contact Ms. Janna Masi at (213) 890-4242.

The statutory responsibilities of the County of Los Angeles Fire Department include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for high fire severity areas, archeological and cultural resources and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

11-6

If you have any additional questions, please contact this office at (213) 881-2481.

Very truly yours,

MICHAEL A. WILKINSON, CHIEF, FORESTRY DIVISION  
PREVENTION BUREAU

MAW:lc

11-1

11-2

11-3

D. CLARKE  
C. A. MILLER

1/1/97



## **Response to Comments From County of Los Angeles Fire Department**

**11-1** Comment noted. The design and construction of the recommended project will comply with all applicable codes and ordinances for construction, access, water mains, fire flows, and fire hydrants.

No changes have been made to the Draft 2015 Plan and EIR.

**11-2** Comment noted. The recommended project is industrial in nature (although the county zoning designation of the project site is Heavy Agriculture). Therefore, the Districts will comply with code requirements for fire flows for that industrial use.

No changes have been made to the Draft 2015 Plan and EIR.

### **11-3 and 11-4**

Comment noted. All on-site driveway requirements will be incorporated into the design of the project.

No changes have been made to the Draft 2015 Plan and EIR.

**11-5** Comment noted.

No changes have been made to the Draft 2015 Plan and EIR.

**11-6** The potential impacts in the areas indicated in the letter, are addressed in the 2015 Plan EIR as follows:

- Erosion control is addressed in Chapter 10, Geologic Hazards and Soils.
- Watershed management is addressed in Chapter 16, Hydrology.
- Rare and endangered species are addressed in Chapter 18, Biological Resources.
- Vegetation is addressed in Chapter 18, Biological Resources.
- Archeological and cultural resources are addressed in Chapter 21, Cultural Resources.

The project is not located in a high fire severity area (Zone 4); it is located in Zone 3, which, therefore, excludes the Districts from preparing a fuel modification plan.

No oak trees will be impacted by the recommended project. Therefore, the County Oak Tree Ordinance is not applicable to this project.

No changes have been made to the Draft 2015 Plan and EIR.

Letter 12

DEPARTMENT OF FISH AND GAME

Region 5  
330 Golden Shore, Suite 50  
Long Beach, California 90802  
(562) 590-5113



September 17, 1997

Mr. Charles W. Carry  
Chief Engineer and General Manager  
County Sanitation Districts of Los Angeles County  
1955 Workman Mill Road  
Whittier, CA 90601-1400  
Attention: Habib Kharat

Dear Mr. Carry:

Draft Environmental Impact Report  
2015 Santa Clarita Valley Joint Sewerage System Facilities Plan  
SCH 9604184, Los Angeles County

17 OCT 1997

The Department of Fish and Game (Department) has reviewed the above-referenced document. Our comments relate mainly to the chapters on hydrology, water quality, and biological resources.

Chapter 16, Hydrology

Page 16-8: "Based on literature review and field reconnaissance, it was determined that the area of potential impact was limited to the reach of the river from the SWRP to the point of percolation, approximately one mile downstream of the county line gauge." The references for this statement need to be specified because the potential impact may reach considerably farther downstream. The footnote reads "Although a net increase or decrease of flow from the Eastern Groundwater Basin may impact downstream groundwater basins, the effects are obscured by tributary inflow and groundwater pumping. It would be highly speculative to attempt to determine groundwater levels or stream flows." Speculation notwithstanding, the potential for impact downstream exists. Consequently, this issue must be addressed in light of the occurrence of two California Species of Special Concern downstream, steelhead (*Oncorhynchus mykiss*) and the Tidewater goby (*Eucyclogobius newberryi*).

12-1

Page 16-11: "Alterations to the hydraulic characteristics of the watercourses are considered beneficial if the scenarios would result in any of the following: Reduction in the extent or severity of flooding of developed areas due to either existing or projected future conditions or increased groundwater recharge." Granted this is true for developed areas, but it is untrue as it applies to the species that inhabit the aquatic and riparian habitats. The native species in these habitats have adapted over time to the extremes in conditions that exist in this area. Their survival may even depend on these extreme conditions.

12-2

Page 16-16: Under the recommended project, it is stated "Given that edge habitat would not be lost, pool habitat would probably increase, overall quantity of habitat would increase,

C.W. CARRY

Mr. Charles W. Carry  
September 17, 1997  
Page Two

and the variability of habitats would increase, it appears that the proposed discharge would have a beneficial impact on the abundance of aquatic habitat." We disagree that edge habitat would not be lost. Unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*), a State and federally listed endangered species, avoid stretches of effluent. Under the recommended scenario, the stretch of effluent water is likely to be extended. Also, any channelization downstream, which the Newhall Land and Farming Company may be considering in their expanded development plan, is likely to eliminate edge habitat, as well as increase flow. These issues must be taken into consideration and mitigated for appropriately.

12-3

General comments: In this chapter, it is unclear to us how projected discharges for the Water Reclamation Plant relate to the existing and projected water extractions by the various water purveyors, and how, in turn, these issues relate to surface flows. This issue needs to be clarified. Finally, as stated in this chapter, the Recommended Project Discharge Scenario would increase discharge at the Valencia Water Reclamation Plant (VWRP) from 9.3 mgd to 27.6 mgd. However, the far more likely discharge scenario, as clearly stated in the document, is the Reduced Discharge Scenario, which would lower discharge from 9.3 mgd to an estimated 4.6 mgd. We agree that the area's projected water needs for the future will require water reclamation. The Department is opposed to any reduction in discharge, because a reduction in discharge would likely cause a reduction in aquatic and riparian habitats. In order to approve the project, the Department would require data that any reduction in discharge would not cause the loss of species and habitat. Also, monitoring schedules would have to be established regardless of which scenario is ultimately adopted.

12-4

Chapter 17, Water Quality

We agree that ammonia levels in the Saugus and Valencia Water Reclamation Plants' effluent are a concern relative to aquatic life, and we applaud the effort to reduce the levels. However, we would like to know more about the proposed nitrification/denitrification process. Is this a new process? Has it been tested, or is it being used successfully elsewhere? If, in fact, it works, how long would it take to implement? What are the alternatives if it does not work? In the event it does not work as expected, what mitigation measures are proposed?

12-5

Chapter 18, Biological Resources

Page 18-2: "The Department of Fish and Game may consider the riparian habitat in the vicinity of the VWRP to fall within its definition of a wetland; DFG typically maintains a policy of no net loss of wetland habitat (California Fish and Game Commission, 1987)." "Wetlands", as defined in the Fish & Game Code of California, Section 2785(g), means lands which may be covered periodically or permanently with shallow water and which include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, fens, and vernal pools. Under this definition, the riparian habitat in the vicinity of the VWRP would be considered a wetland.

12-6

Page 18-4: The Santa Ana sucker (*Catostomus santaanae*) "can survive in turbid water but does not typically reproduce in such water (Swift, 1996)." This is true, but we would add that the Santa Ana sucker, a California Species of Special Concern, survives at much lower densities than it does in clear water. Reproduction and subsequent recruitment is a critical element to the continued survival of any population.

12-7

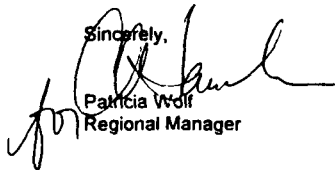
Mr. Charles W. Carry  
September 17, 1997  
Page Three

Pages 18-11 to 18-14: See previous comments above on discharge scenarios under Hydrology, General Comments. | 12-8

Page 18-18: "Impact: Potential for Water Quality Impacts on Aquatic Special-Status Wildlife Species." See comments above under Water Quality. | 12-9

Page 18-20: "Although an emergency release" (as a result of a major catastrophic event) of untreated or partially treated effluent that has an acutely toxic concentration of ammonia "could result in a significantly adverse impact, the recommended project would not substantially increase the risk or probability of occurrence compared to the existing conditions." 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, caused by, ie, a major earthquake. | 12-10

Thank you for the opportunity to provide comments. Questions regarding this letter and further coordination on these issues should be directed to Mr. Ray Ally, Associate Fishery Biologist, at (562) 590-5147.

Sincerely,  
  
Patricia Wolf  
Regional Manager

Copy: Department of Fish and Game  
Long Beach, California  
Mr. Dwayne Maxwell  
Mr. Ray Ally  
Ms. Leslie MacNair  
Ms. Chanelle Davis, Chino Hills  
Ms. Mary Meyer, Ojai

U.S. Fish and Wildlife Services  
Carlsbad, California

U.S. Army Corps of Engineers  
Los Angeles, California

State Clearinghouse  
Sacramento, California

## **Response to Comments From California Department of Fish and Game**

---

- 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. Future development may affect downstream groundwater levels in the Saugus and Alluvial Aquifers as well as the downstream aquifers. In addition, pumping demands and recharge rates are dependent on climate, which is highly variable. Although an analysis of past conditions is possible, it is purely speculative to forecast rates of groundwater pumping, recharge and the interaction with rising groundwater. Section 15145 of the state CEQA guidelines specifically states that if the Lead Agency (Districts) finds that an impact is too speculative for evaluation, the agency should note its conclusions and terminate discussion of the impact.

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 area of impact would be limited to the perennial reach of the river downstream of the SWRP and VWRP, and potential impacts to the steelhead and tidewater goby would be avoided.

No changes have been made to the Draft 2015 Plan and EIR.

- 12-2 As shown in Appendix D, Table D-7, average monthly downstream flow currently ranges from 11 to 69 mgd. Based on the Reduced Discharge Scenario (Appendix D, Table D-6), the average monthly downstream flow would range from 6 to 64 mgd, and, based on the Recommended Project Discharge Scenario (Appendix D, Table D-9), the average monthly downstream flow would range from 29 to 88 mgd. Therefore, whether or not the rate of discharge increases or decreases between now and 2015, variability in surface flows and extreme conditions would still continue. In addition, high flow in the Santa Clara River associated with winter storms would continue to occur given that, under each of the discharge scenarios evaluated, the combined SWRP and VWRP discharge to the river would be less than one percent of the highest recorded mean daily flow (5,100 mgd or 7,900 cfs) and less than one-tenth of a percent of the largest recorded instantaneous flow (44,500 mgd or 70,400 cfs). Since 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.

No changes have been made to the Draft 2015 Plan and EIR.

- 12-3 Chapter 16, Hydrology, only discusses the physical presence or absence of potential habitat. The quality of that habitat is further described in Chapter 17, Water Quality, and Chapter 18, Biological Resources.

Except during winter storms, the perennial reach of the Santa Clara River downstream of the SWRP and VWRP consists mostly of treated effluent, as shown in Appendix D, Table D-11. Throughout the entire range of discharge scenarios evaluated, this reach is not expected to change in length, and, consequently, the quantity of edge habitat would remain the same.

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. As documented by the *Unarmored Threespine Stickleback Recovery Plan (Revised)* (USFWS, 1985), this downstream reach has supported a new population of unarmored threespine stickleback. The *Unarmored Threespine Stickleback Recovery Plan (Revised)* also states that *tertiary treated sewage water, if released into the upper Santa Clara River, would probably be of sufficient quality to increase the size and productivity of the G. a. williamsoni habitat.*

Reconnaissance field surveys conducted in August 1996 by Jones and Stokes Associates staff (including a fisheries biologist, hydrologist, wildlife biologist, and botanist) and by Drs. Jonathan Baskin and Thomas Haglund of San Marino Environmental Associates, confirmed the abundance of the unarmored threespine stickleback in the reach of the Santa Clara River downstream from the SWRP and VWRP outfalls (refer to Figure 18-1 and Table 18-1). More recently, surveys conducted in August 1997 by Aquatic Consultants as part of a mitigation monitoring program for an ongoing retaining wall construction project at the VWRP also confirmed the abundance of unarmored threespine stickleback in this reach of the river. It is evident that the unarmored threespine stickleback has adapted to the high quality, tertiary-treated effluent, and, with the addition of nitrification-denitrification facilities, the quality of the effluent will only improve.

Through the Cumulative Discharge Scenario, the Draft 2015 EIR assesses the cumulative impact of combined discharges from the SWRP, VWRP, and the proposed Newhall Ranch WRP. 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. Furthermore, as stated above, the quantity of edge habitat is not expected to be impacted by any of the discharge scenarios since the length of the reach would not change as flow either increases or decreases. Therefore, the cumulative impact analysis addresses neither the channelization proposed by Newhall Land and Farming Company nor the impacts channelization may have on edge habitat. In general, mitigation of impacts caused by Newhall Land and Farming Company are the responsibility of the lead agency for the Newhall Ranch project and Newhall Land and Farming Company and are not the responsibility of the Districts.

No changes have been made to the Draft 2015 Plan and EIR.

- 12-4 The Districts are responsible for the collection, treatment, and disposal of wastewater. Based on projected population growth, the VWRP will need to be expanded to treat 27.6 mgd. Also, based on projected population growth, there is a forecasted shortage of water. The use of reclaimed wastewater could alleviate a portion of that shortage. Anticipating that at some time in the future water reuse would take place, the Districts evaluated a range of discharge scenarios that would address the potential impacts of the project and reuse.

The Santa Clarita Valley's water supply is currently derived from both local and imported sources. Aside from making reclaimed water available for reuse, the Districts have no control over present and future water supply, including groundwater extraction. Currently, the local groundwater basin is not

adjudicated, and, therefore, it would be highly speculative to estimate the distribution of future water supply from local and imported sources.

The relationship between future local groundwater extraction and surface flow is difficult to predict. While increased groundwater extraction may lower the water table and decrease surface flow, most of the extracted water would eventually be returned to the Santa Clara River and its underlying groundwater basins through discharge from the SWRP and VWRP. Also, while an immediate effect of increased reclaimed water reuse would be a decrease in surface flow, reuse would augment the water supplied from groundwater sources. 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.

Since both the SWRP and VWRP discharge treated effluent to the Santa Clara River, the combined discharge of the two WRPs should be considered when evaluating the potential impacts of varying discharge levels. Under the Recommended Project Scenario, the combined discharge from the SWRP and VWRP would increase from 15.2 mgd to 34.1 mgd. Under the Reduced Discharge Scenario, the combined discharge from the SWRP and VWRP would decrease from 15.2 mgd to 9.6 mgd. Nowhere in the Draft 2015 EIR is it stated that the Reduced Discharge Scenario is the more likely discharge scenario. Currently, all treated effluent from both the SWRP and VWRP is discharged to the Santa Clara River, and the only approved reclaimed water project is the proposed reuse of 1,600 AFY (1.4 mgd) by Castaic Lake Water Agency. 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.

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 (combined SWRP and VWRP discharge of 9.6) 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 when the combined discharge from the SWRP and VWRP was approximately 8.6 mgd. According to the *Unarmored Threespine Stickleback Recovery Plan (Revised)* (USFWS, 1985), this discharge level supported a new population of unarmored threespine stickleback.

DFG's opposition to any reduction in discharge is also in conflict with Section 461 of the California Water Code which states that *the primary interest of the people of the state in the conservation of all available water resources requires the maximum reuse of reclaimed water in the satisfaction of requirements for beneficial uses of water*. 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.

If and when a water purveyor proposes a water reuse project, the Districts will file a Petition for Change with the SWRCB to change the point of discharge, amount of discharge, place of use, and purpose of use in accordance with state law (Section 1211 of Article 1.5 of the California Water Code). At that time, the water purveyor would prepare the appropriate environmental documentation analyzing the impacts of reduced discharge and construction and operation of facilities to distribute and store the reclaimed water. It is expected that the water purveyor would base part of its analysis on the conclusions of the 2015 EIR. Any necessary monitoring would have to be determined by the water purveyor and DFG. Any filing fees for the Petition for Change would be the responsibility of the water purveyor.

No changes have been made to the Draft 2015 Plan and EIR.

- 12-5** The proposed nitrification-denitrification process is based on established theories and technologies that have proven to be successful in similar applications at wastewater treatment facilities elsewhere. The Districts are currently conducting research and development studies in order to design the process to match the particular treatment schemes and influent characteristics.

The general design of the nitrification-denitrification process involves partitioning the existing aeration tanks into one or more series of alternating anoxic and aerobic zones. Effluent from the primary treatment process is introduced into the anoxic zone along with return activated sludge flow from the secondary clarifier and a nitrified recycle flow from the aerobic zone. The anoxic zone will allow reduction of nitrates to nitrogen gas. The subsequent aerobic zone will allow for the conversion of ammonia to nitrate.

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 for nitrification-denitrification. Preliminary results of the tests have indicated that the process will effectively remove the ammonia to acceptable levels. However, the optimum design mode of the treatment process and ancillary systems still needs to be determined. Nevertheless, 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.

Figure 7-2 presents the implementation schedule for the recommended project. As shown, the upgrade of both the SWRP and VWRP will be complete by mid-2003. A number of tasks need to be completed before the project can be implemented. These activities include continued full-scale operational tests of the proposed nitrification-denitrification processes to identify the optimum design criteria and operational procedures, completion of the relief of trunk sewers downstream of the SWRP to allow for the diversion of flow to the VWRP during the upgrade of the SWRP, and scheduling of the VWRP upgrade so as not to interfere with the concurrent expansion related construction activities.

No changes have been made to the Draft 2015 Plan and EIR.

**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 (page 18-15). Therefore, 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.

No changes have been made to the Draft 2015 Plan and EIR.

**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.

No changes have been made to the Draft 2015 Plan and EIR.

**12-8** See response to Comment 12-4.

No changes have been made to the Draft 2015 Plan and EIR.

**12-9** See response to Comment 12-5.

No changes have been made to the Draft 2015 Plan and EIR.

**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.

No changes have been made to the Draft 2015 Plan and EIR.



Letter 13

SEP-23-1997 16:19

RMA PLANNING

805 654 2509 P.01

SEP-23-1997 16:19

RMA PLANNING

805 654 2509 P.02

RESOURCE MANAGEMENT AGENCY  
**county of ventura**

THOMAS BERG  
Agency Director

COUNTY OF VENTURA  
PUBLIC WORKS AGENCY  
WATER RESOURCES & DEVELOPMENT DEPARTMENT

MEMORANDUM  
August 28, 1997

1997 SEP 16 AM 9:12

Tuesday, September 23, 1997

Charles W. Carry  
County of L.A. Sanitation Dist.  
FAX 562-699-5422

Subject: Santa Clarita Valley Sewer Pln 2015

Dear Mr. Carry:

Thank you for the opportunity to review the subject documents. These notices were circulated for review. The responses are attached. Please forward your reply to our comments as appropriate.

Please call Kim Hocking if you have questions and he will direct you to the appropriate person, 805-654-2414.

Yours truly,



Thomas Berg, Director

Reference No. 97-51

cc: Trigg, PWA - L#1600

Attachment

1997 SEP 24 AM 9:57

To: Kim Hocking, Case Planner  
RMA/Planning Department

From: Lowell Preston, Ph.D., Manager  
Water Resources Division

Subject: VENTURA COUNTY GROUNDWATER-RELATED COMMENTS ON  
DRAFT 2015 SANTA CLARITA VALLEY JOINT SEWERAGE SYSTEM  
FACILITIES PLAN and DRAFT ENVIRONMENTAL IMPACT REPORT

Some impacts resulting from the subject facility upgrade will be beneficial to Ventura County water users and some will be injurious unless they are mitigated. In addition to treatment options already proposed in the Draft EIR, plans must be incorporated to limit chloride ion concentrations if significant project impacts on Piru Subbasin agriculture are to be mitigated. This and other impacts are discussed below.

**Project Description:**

Combined discharge from the Saugus Water Reclamation Plant (SWRP) and the Valencis Water Reclamation Plant (VWRP) currently averages 15.0 million gallons per day (mgd). In order to accommodate anticipated growth in the Santa Clarita Valley, the Districts are planning to further expand the VWRP. The existing plant capacity would be exceeded by 1999.

Construction would occur in two phases: a 9.0 mgd increase followed by a 6.0 mgd increase. By the year 2010, the capacity of the VWRP would increase to 27.6 mgd, bringing the total capacity for the Santa Clarita Valley Joint Sewerage System (SCVJSS) to 34.1 mgd, including the SWRP. Other existing facilities would bring the total discharge capacity to 39.1 mgd by the year 2015.

This project is relevant to Ventura County because the subject treatment plant effluent discharges into the Santa Clara River, which flows into and recharges the Piru groundwater basin and supports a large citrus ranching economy, as well as providing drinking water for area residents. The communities of Piru, Fillmore and Santa Paula are entirely dependent on local groundwater for municipal water supplies. Except for Sespe and Piru Creeks and the Santa Felicia Dam, the Santa Clara River provides all of the water to recharge these sole-source Ventura County aquifers.

**General Discussion:**

During low flow conditions, eighty-five percent of Santa Clara River flow into Ventura County is treatment plant effluent, and effluent comprises 15 percent of total flow in a normal year. Therefore, the quality of Santa Clarita-area treatment plant discharge is critical to the welfare of Ven-

tura County ranchers and others. Santa Clarita Valley treatment plant effluent discharged to the Santa Clara River contributes recharge to most of Ventura County's groundwater basins, either directly or via the Improved Vern Freeman Diversion to the Oxnard Plain. This effluent quantity will nearly double with the proposed upgrades. During years of above-average rainfall, there could soon be continuous surface flow in the Santa Clara River from the county line to the ocean.

13-1

Positive project impacts to Ventura County will result from the decision to incorporate denitrification facilities at both the SWRP and the VWRP into the treatment plant upgrade. Reduced nitrate levels will help reestablish a native fish (steelhead) habitat in the river. Denitrification would also discourage the growth of undesirable plant species in the river bed which could exacerbate flooding problems. Groundwater degradation would be decreased if perennial surface flows reduce the Piru basin capacity for recharge by storm flows containing "first flush" surface runoff from streets and parking lots in the Santa Clarita Valley.

13-2

A primary concern is the chloride ion level in treated effluent discharges. The average chloride concentration of SWRP discharge is 110 milligrams per liter (mg/l), and the VWRP effluent averages 135 mg/l chloride. These levels are above the 100 mg/l limit where chloride-sensitive crops become impacted. Piru Basin groundwater averages about 75 mg/l chloride. Groundwater recharge by effluent containing elevated chloride levels will eventually impact the citrus crop irrigation source.

13-3

Until 1990, the Los Angeles Regional Water Quality Control Board (LARWQCB) standard for treatment plant chloride discharge was 100 mg/l. The short-term limit was increased to 190 mg/l in 1997 at the request of treatment plant operators because, during drought periods, treatment plant effluent discharge sometimes reaches and even exceeds the new 190 mg/l reportable discharge limit. The LARWQCB has expressed an interest in reducing chloride ion concentrations. If any new discharge standards for chloride ion are to be adopted by the LARWQCB, they will not go into effect until the year 2001. Adoption of chloride ion reduction policies would be influenced by the cost-effectiveness of advanced treatment technology capable of removing chloride. Total dissolved solids (TDS) levels at the VWRP and SWRP are now moderate, in the 600 to 900 mg/l range. Piru basin groundwater TDS levels have declined since 1980 due to treatment plant effluent discharge flows via the Santa Clara River.

13-4

**Recommendations:**

The Environmental Impact Report should evaluate the total impact to the Piru basin resulting from wastewater treatment plant discharges of chloride ion between 100 and 190 mg/l.

13-5

If you have any questions, please call me at (805) 654-2088, or call Mr. LaVern Hoffman of my staff at (805) 654-2907.

RLP:ATP:LCH/h

scvissf1.doc

## **Response to Comments From County of Ventura, Resource Management Agency/Public Works Agency, Water Resources and Development Department**

---

**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. Under each of the discharge scenarios evaluated, the combined SWRP and VWRP discharge to the river would be less than one percent of the highest recorded mean daily surface flow (5,100 mgd or 7,900 cfs) and less than one-tenth of a percent of the largest recorded instantaneous surface flow (44,500 mgd or 70,400 cfs).

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. Temporary instances of continuous surface flow in the ephemeral reach of the river can be attributed to flood flows exceeding the rate of percolation.

No changes have been made to the Draft 2015 Plan and EIR.

**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. Furthermore, the relationship between the recharge of the Piru Groundwater Basin and surface flows in the Santa Clara River is quite complex (see response to Comment 13-3), and the impact of surface runoff on groundwater degradation is not fully understood. See response to Comment 13-1 regarding the potential for perennial surface flow from the Los Angeles/Ventura County line to the ocean.

No changes have been made to the Draft 2015 Plan and EIR.

**13-3** As stated in the EIR, the Districts do not believe there are any significant impacts to the Piru Groundwater Basin as a result of the SWRP and VWRP effluent discharge, including any impact from chloride discharge. The Santa Clara River watershed has a complex hydrology, which is composed of multiple tributaries with varying flows and qualities. Furthermore, there is a continuous interaction between surface waters and groundwaters. Thus, the water being recharged into a groundwater basin generally does not have the same chloride concentration as the discharge from the WRPs. Instead, the water being recharged tends to be at much lower concentrations due to mixing with other sources (e.g. natural runoff, reservoir releases, rising groundwater, etc.).

Historical data shows that chloride levels at the Freeman diversion have consistently been under 100 mg/l during this decade. Chloride levels at receiving water station R-E, which is only 2.5 miles downstream of VWRP, seldom exceed 110 mg/l. Thus, it cannot be assumed that effluent chloride concentrations in the SWRP and VWRP effluent directly translate into the same concentrations at

downstream groundwater basins. Furthermore, the percolation into the Piru Basin from the Santa Clara River is not the sole, or even the majority, contributor to the total groundwater flow. As a result, the magnitude of impact of chloride concentrations in the receiving water is further dampened during percolation into the groundwater as the various sources of the groundwater mix. Thus, the impact of the SWRP's and VWRP's chloride levels on the groundwater basins, including the Piru Basin, is considered less than significant.

It is also important to note that effluent chloride concentrations from the SWRP and VWRP will not increase as a result of increases in WRP flows. Instead, any increases in effluent chloride concentrations are predominantly the result of higher chloride concentrations in the water supply. The chloride concentrations in the local water supply has fluctuated from approximately 40 mg/l to 120 mg/l over the past two decades depending on climatic conditions and source. Accordingly, effluent chloride concentration from these WRPs has ranged from approximately 90 mg/l to 200 mg/l during the same period. This range closely matches the range of concentrations (100 mg/l to 190 mg/l) that the Water Resources and Development Department requested to be evaluated in the Memorandum of August 28, 1997. The memorandum stated that current chloride concentrations in the Piru basin average 75 mg/l. This suggests that the higher chloride levels in the WRP effluents caused by the drought of the late 1980s had no substantial impact on the Piru basin. This conclusion is supported by the *1993 Regional Ground Water Assessment and Well Data Survey* conducted for the RWQCB by John Foster of California State University Fullerton, which shows well data in the Piru basin averaging 74 mg/l (based on 1989-1992 data).

Thus, the average chloride concentrations in the Piru basin appear to have remained relatively constant at approximately 75 mg/l during the 1990s. These results suggest that the different hydrologic inputs and processes (WRP flows, reservoir releases, groundwater, natural runoff, etc.) in the Santa Clara River result in chloride concentrations that are not degrading the overall quality of surface waters or groundwaters of the Piru basin. Since the WRPs may only represent 15 percent of the river flow in a normal year, the long-term effects are not considered to be significant. Finally, the high level of treatment provided at the WRPs plus the relatively low concentrations of TDS, sulfate, boron, and chlorides (when compared to national standards) represent a water resource benefit to the region.

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. First, the citrus crops that predominate in Piru may endure irrigation water with chloride concentrations of 235 to 350 mg/l (Faber, 1997) or even higher (Ayers and Westcot, 1985; Pettygrove and Asano, 1984), provided that proper irrigation practices are followed. Second, the threshold levels for leaf burning do not consider that irrigation water and runoff can fluctuate during the year due to the amount and frequency of precipitation. For example, any chloride buildup that may occur during the summer may be alleviated during the winter by natural storm water runoff. Lastly, detrimental effects on crops are also largely dependent on irrigation practices. As mentioned by Dr. Ben Faber of the Farm Advisory Committee at the RWQCB chloride meeting on September 11, 1997, in Ventura, farmers who do not follow proper irrigation practices can cause high

chloride buildup in crops, even if chloride levels in the water supply are low. Improper irrigation practices plus irrigation return flows can be critical to crops and groundwater basins, because they concentrate salts in the soil.

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.

No changes have been made to the Draft 2015 Plan and EIR.

**13-4** Comment noted.

No changes have been made to the Draft 2015 Plan and EIR.

**13-5** See response to Comment 13-3.

No changes have been made to the Draft 2015 Plan and EIR.

Letter 14



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE  
Southwest Region  
851 West Ocean Boulevard, Suite 4200  
Long Beach, California 90802-4213

W.T.H.  
9/22/97

SEP 17 1997

F/SWO21:APS

Mr. Wayne Hubbard  
California Water Resources Control Board  
Environmental Services Unit  
P. O. Box 944212  
Sacramento, CA 94244-2120

Dear Mr. Hubbard:


The National Marine Fisheries Service (NMFS) appreciates the opportunity to review the draft 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan and FIR (EIR). We understand that the proposed project actions include increasing the capacity of the Valencia Water Reclamation Plant, which discharges treated effluent to the Santa Clara River. The project is located in the Southern California Evolutionarily Significant Unit for the Federally proposed endangered steelhead (*Oncorhynchus mykiss*), and is therefore of concern.

14-1

The proposed project is not likely to adversely affect steelhead, based on our review of the EIR. This determination may be reconsidered if either project plans change or if additional information becomes available. No additional consultation with NMFS under section 7 of the Endangered Species Act is necessary if the project remains unchanged. Please contact Mr. Anthony Spina at (562) 980-4045 if you want additional information.

14-2

Sincerely,

  
William T. Hogarth, Ph. D.  
Acting Regional Administrator



**Response to Comments From United States Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service**

---

**14-1** Comment noted.

No changes have been made to the Draft 2015 Plan and EIR.

**14-2** Comment noted.

No changes have been made to the Draft 2015 Plan and EIR.



Letter 15

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ventura Fish and Wildlife Office  
2493 Portola Road, Suite B  
Ventura, California 93003

November 14, 1997

Gary Yoshida  
County Sanitation Districts of Los Angeles County  
1955 Workman Mill Road  
Whittier, California 90601

Subject: Comments on the Draft Santa Clarita Valley Joint Sewerage System Facilities Plan and Environmental Impact Report

Dear Mr. Yoshida:

The U.S. Fish and Wildlife Service (Service) has reviewed the Draft Santa Clarita Valley Joint Sewerage System Facilities Plan and Environmental Impact Report (DEIR). The subject document serves as the plan and DEIR wherein the County Sanitation Districts of Los Angeles County (District) address projected increases in population within the Santa Clarita area and, more specifically, expansion and upgrade of the Valencia Water Reclamation Plant to treat the projected additional inflow.

To gain a better understanding of a proposed project and to alert agencies to our concerns early in the planning process, the Service often reviews and provides comments on draft and final environmental impact statements and reports. The following comments are prepared as technical assistance to your agency.

GENERAL COMMENTS

The natural groundwater regime, contributions to surface flows, and fluvial processes historically governed the location, volume, and seasonality of surface flow, and therefore the distribution of available habitats for wildlife within the Santa Clara River. The scale of development with the Santa Clarita area is responsible for extensive modifications to groundwater, surface flows, and fluvial processes in the Santa Clara River. These facts are often noted yet the cumulative effect on the vegetation and wildlife in the river is seldom fully evaluated by effective comparison with pre-development conditions that consider currently planned development. In the DEIR, this is evident by comments made at page 16-10: "The data set was truncated so that earlier data would not influence the water budget estimates." Absent this information, the DEIR does not provide a clear comparison with pre-development conditions

Gary Yoshida

2

or, if such information is unavailable, conditions during the period immediately preceding large scale flood control and water extraction activities.

15-1

With regard to potential flows in the Santa Clara River (chapter 16), the DEIR fails to more closely compare the expected levels of groundwater extraction from the alluvial and Saugus aquifers, imported water, and reuse of reclaimed water. Elsewhere in southern California, the State has concluded that imported water may be fully reused. A consequence of increased demand for reclaimed water could be the loss of treatment plant discharge that originated as imported water. Thus, in the long term, only locally derived water may be available for maintaining native habitats in the river. A clear understanding of the relationship between groundwater extraction and treatment plant discharge is essential to evaluating effects to native habitats and wildlife. The District should present in tabular form the information on groundwater extraction, imported water, treatment plant discharge, and reuse of reclaimed water. Such a format would facilitate evaluation of the potential impact of the scenarios presented. To further aid in evaluation of information presented, the DEIR should have employed a single unit of measure instead of both million gallons per day (mgd) and acre feet per year (see page 16-7 for example).

15-2

SPECIFIC COMMENTS

Pages 16-6, 16-13, and 18-18. In addition to the 34.1 mgd permitted capacity anticipated for the Santa Clarita Valley Joint Sewerage System, the DEIR notes that the treatment plant associated with the proposed Newhall Ranch development would discharge up to 7.7 mgd. Although the DEIR states that continuous flows in the Santa Clara River below the Los Angeles/Ventura County line are unlikely except under flood conditions, it is not clear to the Service how such a conclusion was reached. Under the permitted discharge scenario, the District should more explicitly examine the possibility for cumulative discharge, when combined with appropriate weather conditions, to result in continuous, relatively low flows in the river for a period that would permit partially armored threespine sticklebacks (*Gasterosteus aculeatus microcephalus*) to move into the reach supporting unarmored threespine sticklebacks (*Gasterosteus aculeatus williamsoni*), a federally listed endangered species.

15-3

Page 16-16. The Service agrees that the recommended project and the cumulative discharge scenarios would place more water in the Santa Clara River. However, the Service believes that several statements are unsupported and inaccurate. For example, the DEIR states "Pool habitat would deepen and a much faster deeper habitat would be created. Overall there would be an overall increase in the absolute quantity of habitat and additional habitat variability." Faster flow and deeper water would certainly provide additional habitat for species that prefer these conditions (although the Service suspects that such conditions in the Santa Clara River would produce riffle habitat rather than more and deeper pools). Currently, the flows present during much of the year are shallow and slow moving and produce habitat conditions preferred by the unarmored threespine stickleback. In any case, it is not clear to the Service just what additional flow, in the volumes discussed, would produce: faster flow and deeper water in the existing

15-4

15-1

1997 NOV 17 AM 11:05



Gary Yoshida

3

wetted area or shallow flow and low velocity over a larger expanse of the flood plain. In both chapter 16 and 18, the DEIR should more clearly explain how hypothetical discharge volumes were converted to river conditions.

15-4

Page 18-4. The DEIR should reflect the listing of the southern steelhead (*Oncorhynchus mykiss*) as endangered. You may wish to indicate that the southern steelhead was listed by the National Marine Fisheries Service under the Federal Endangered Species Act of 1973, as amended (Federal ESA).

15-5

Page 18-18. As noted in our comments for page 16-16, the Service believes that analysis of the effect of increased flows on available habitat requires additional explanation. If the increased flow volumes discussed do indeed increase the velocity and depth of flow as described, the unarmored threespine stickleback could be adversely affected.

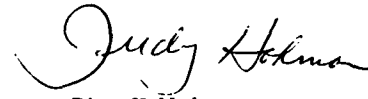
15-6

The Service believes that the construction activities associated with expansion and upgrade of the Valencia Water Reclamation Plant are unlikely to adversely affect listed species. However, operation of the expanded Valencia Water Reclamation Plant may adversely affect both the unarmored threespine stickleback and the least Bell's vireo. The Service is aware that funding for the expansion and upgrade project would be provided in part by the Environmental Protection Agency (EPA) through the State of California's Revolving Fund. In instances where there is a Federal connection with a project (such as funding), the effects of that action on federally listed species may be addressed by the Service through issuance of a biological opinion and incidental take statement pursuant to section 7 of the Federal ESA. However, in the Service's opinion, EPA funding for this project is unlikely to provide such a Federal connection for the operation of the water reclamation plant. As a consequence, the District may need to prepare an habitat conservation plan and apply for an incidental take permit pursuant to section 10(a)(1)(B) of the Federal ESA.

15-7

We appreciate the opportunity to provide these comments and anticipate working with your staff to assist the District in meeting its responsibilities under the Federal ESA. Should you have any questions regarding these comments or your responsibilities under the Federal ESA, please contact Kirk Waln of my staff at (805) 644-1766.

Sincerely,

  
Diane K. Noda  
Acting Field Supervisor

## Response to Comments From United States Department of the Interior, Fish and Wildlife Service

---

**15-1** The Districts concur that development in the Santa Clarita area as well as other development in the Santa Clara River basin has resulted in extensive modifications to the groundwater and surface water flows and the fluvial process that ultimately regulates the development and success of wildlife habitats along the river. However, 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. With respect to the reference to page 16-10 of the Draft 2015 EIR, the flow data available for the Santa Clara River was truncated to exclude effects of the State Water Project and operations of related facilities. Inclusion of the additional data would skew the data set resulting in a misrepresentation of the conditions as they occur now, before commencement of the project.

No changes have been made to the Draft 2015 Plan and EIR.

**15-2** The relationship between habitat values and future groundwater extraction, surface water importation, and wastewater reuse (activities which are beyond the control of the Districts) is difficult to predict, and evaluation of this relationship would be highly 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. See response to Comment 12-4 for further discussion of this issue.

It is common to describe instantaneous flow rates in units of million gallons per day or cubic feet per second; annual flow rates are typically described in units of acre-feet per year.

No changes have been made to the Draft 2015 Plan and EIR.

**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 comprise less than one percent of the river's highest recorded mean daily flow (5,100 mgd or 7,900 cfs) and less than one-tenth of a percent of the largest recorded instantaneous flow (44,500 mgd or 70,400 cfs). Therefore, while increased cumulative discharge to the river could potentially decrease the length of the gap, there would be no continuous sustained low flow to allow for upstream migration of the partially armored threespine stickleback.

No changes have been made to the Draft 2015 Plan and EIR.

**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. The resulting low-flow channel, created within the active channel, would be smaller or larger depending on the change in base flow (rising groundwater and effluent) in the affected reach. 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 size and location of 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. Increased base flow should not produce riffle habitat (i.e., shallow, fast water), since the gradient of the river would remain constant. It is likely that the low-flow channel would widen and deepen in response to increased discharge. Velocity would also increase in the low-flow channel as the effects of bed roughness decrease with increasing depth. However, since annual flood flows have resulted in a wide, gradual sloping, active channel profile, the river will still have the shallow, slow flowing, edge habitat and pools preferred by the unarmored threespine stickleback. Therefore, the increased depth, width, and flow velocity in the low-flow channel would not adversely impact the habitat that supports the unarmored threespine stickleback, but would instead increase the overall variability of river's habitat.

No changes have been made to the Draft 2015 Plan and EIR.

- 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). NMFS concluded that the project would not have an adverse effect on steelhead and further consultation under Section 7 of the Endangered Species Act would not be necessary. See the NMFS letter (Letter No. 14) for additional information.

No changes have been made to the Draft 2015 Plan and EIR.

- 15-6** See response to Comment 15-4.

No changes have been made to the Draft 2015 Plan and EIR.

- 15-7** The Districts concur that construction impacts of the proposed project will not adversely affect listed species. However, 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. Increasing or decreasing discharge levels will only affect the size of the low-flow channel within the active channel and may somewhat increase or decrease the extent of emergent and aquatic plants species located within the active channel.

The Service's determination that EPA funding for the project is unlikely to provide a federal connection is noted. 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 pursuant to Section 10(a)(1)(B) of the Federal Endangered Species Act.

No changes have been made to the Draft 2015 Plan and EIR.

**TRANSCRIPT OF MICHAEL KOTCH'S TESTIMONY**

**August 27, 1997, Public Hearing**

Hi Don, I am Michael Kotch, K O T C H. I am with the Santa Clarita Organization for Planning the Environment. I would like to talk, touch on a couple of different areas here within your review. One is the growth inducing aspects of the plan and the other deals with alternatives to the plan. You have adopted SCAG projections in terms of estimating population and future demand for your plan. But you should be advised and you are probably aware that SCAG projections are not encapsulated into either Los Angeles County's general plan for the area or the City of Santa Clarita's general plan for the area, and it is quite conceivable that the population figures that you are looking at do not represent the buildout of either general plan but in fact go beyond such a general plan in either area. In such a case your factors that you are estimating must necessarily be considered to be growth inducing, and I wish you to consider that within your environmental assessment. If you are allowing for a population of 500,000 as an example, and the general plan only allows for a population of say 270,000, you are necessarily creating facilities that are, that could be caused to induce growth. You should acknowledge that and resolve that in your general plan.

The other thing I would like to touch on is while the expansion of Valencia might be the most expeditious way of improving services for the area, there are two items to consider. One is the general condition of the Saugus Plant and a potential plant for upstream and the other is the consideration of reclaimed water as a resource. Saugus, as we know, delivers solids right now to Valencia. Saugus is, if you will, half a plant. It cannot handle its existing demand. That demand is handled downstream in Valencia. With future growth, this might get worse and we are going to be relying more and more on Valencia to be the primary plant for treatment. There could be good engineering reasons why we might want to move upstream rather than downstream to have some backup and protectives in which Saugus is providing full treatment of its total and perhaps is even insuring the load with a plant that is upstream. And that ties into reclaimed water. Part of our, part of your responsibility is to treat wastewater to make it safe for people but there is a growing recognition that reclaimed water is a resource that we can use in Southern California for landscaping, for any number of reasons in order to conserve our water resources. To use reclaimed water, it depends on the elevation that you get it at. If it is down at Valencia, that's less valuable water than if it is further upstream at a higher head at Saugus. The same goes on even further if there is a treatment plant, say at Sierra and Soledad, that is off loading some of the Saugus flow. That water for reclaimed uses is even more valuable, and so I would urge you to look at the beneficial impacts that reclaimed water uses can realize in alternatives in which reclaimed water is available from further upstream resources for other users.

Thanks very much.

**Comment:** The speaker mentioned that SCAG's population projections are not consistent with the projections developed by the City of Santa Clarita and the County in their respective General Plans. Therefore, he believed that by using SCAG's projections the Draft 2015 Plan and EIR might be considered to be growth inducing.

**Response:** See responses to Comments 6-1 and 6-2 in the City of Santa Clarita letter (Letter No. 6).

No changes have been made to the Draft 2015 Plan and EIR.

**Comment:** The speaker felt the alternatives analysis should have considered either expanding the Saugus WRP to include solids processing or providing a new treatment plant upstream of the Saugus WRP. Such an alternative would be beneficial for providing a backup to the Valencia WRP in addition to supplying reclaimed water for potential future demand. This alternative would take advantage of the higher elevation of the new plant for reclaimed water delivery.

**Response:** See Chapter 6 of the 2015 Plan regarding expansion of the SWRP and response to Comment 6-3 in the City of Santa Clarita letter (Letter No. 6) regarding siting of a new WRP.

**Response to Oral Comments — South Coast Air Quality Management District**

---

**TARA TISOPULOUS**

**August 26, 1997, Telephone Conversation**

**Comment:** No comments on Draft 2015 Plan and EIR.

**Response:** Comment noted.

No changes have been made to the Draft 2015 Plan and EIR.