



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

County Staff Responses to Public Correspondence

October 20, 2011

MISSION VILLAGE PROJECT

COUNTY PROJECT NO. 04-181-(5)
VESTING TENTATIVE TRACT MAP NO. 061105
CONDITIONAL USE PERMIT NO. 20050080
CONDITIONAL USE PERMIT NO. 20050081
OAK TREE PERMIT NO. 20050032
OAK TREE PERMIT NO. 20050043
PARKING PERMIT NO. 200500011
STATE CLEARINGHOUSE NO. 2005051143



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

BOS-1 Letter to Board of Supervisors from Ventura County Agricultural Water Quality Coalition, dated September 23, 2011

Ventura County Agricultural Water Quality Coalition
916 W. Ventura Boulevard
Camarillo, California 93010
(805) 388-2727 • (805) 388-2767 Fax
www.vcawqc.org

September 23, 2011

Mr. Michael D. Antonovich
Supervisor, Fifth District
Los Angeles County Board of Supervisors
500 W. Temple St..
Los Angeles, CA 90012

Re: Re-Circulated DEIR for Landmark Village 1st phase of the Newhall Ranch Project on the Santa Clara River **Project No. 00-196 / Tract Map No. 53108**, 1444 units, over 1 million square feet of commercial – Issues relating to Chloride

Honorable Supervisor Antonovich:

The Newhall Ranch Specific Plan Environmental Impact Report was certified by the Los Angeles County Board of Supervisors in 2003. It stated that a new sanitation plant would be built to serve this project. In a letter dated in 2003 commenting on this issue for the DEIR, the Los Angeles Regional Water Quality Control Board (RWQCB) stated that achieving the Santa Clara River chloride Total Maximum Daily Load (TMDL) would be addressed in the permitting process by requiring that the Newhall Ranch Sanitation Plant releases to the Santa Clara River meet the chloride TMDL of 100mg/L.

The permit, granted in 2007, in fact required the 100mg/L chloride objective to be met, with the intention that this plant, promising to be operated with reverse osmosis, would reduce the overall chloride level in the river. Now Newhall is instead proposing to run the first two tracts of Newhall Ranch, totaling some 6,000 units through the existing Valencia Sanitation Plant, a scenario that could elevate the chloride load rather than reducing it.

Several additional environmental documents have also been completed for various permits needed for the Newhall Ranch project, including the formation of a Newhall Ranch Sanitation District and a comprehensive EIR/EIS prepared for the Santa Clara River Alteration permit in this area. All these documents refer to the construction of a sanitation plant that will meet the chloride objective of 100mg/L.

Coalition Members:

Ventura County Agricultural Assn.
Ventura County Farm Bureau
Western Growers
California Avocado Commission
California Strawberry Commission
Ventura County Economic Development Association
Association of Water Agencies of Ventura County
United Water Conservation District
A.A. Naumann, Inc.
Oxnard Lemon Company
Somis Pacific Agricultural Mgmt.
Saticoy Lemon Association
Limoneira
Ventura Pacific Company
Calavo Growers
Sunrise Growers
Catalinos Berry Farms
D.W. Berry Farms
Iwamoto-Gean Strawberry Farms
Anacapa Berry Farms
Westview Berry Farms
Pacífico Berry Farms
Mugu Ranch Partnership
Conroy Farms
Mandalay Berry Farms
Pac-Man General Partnership
Montalvo Farms
Festival Farms
Gull Island Farms
Dullam Nursery

Newhall now proposes in this first tract map application for Landmark Village, that the first 6,000 units of housing developed in Newhall Ranch may be serviced by the Valencia Treatment plant instead of meeting their requirement to build a new plant. Such a proposal would seem on its face to severely impede the RWQCB requirement to meet the chloride objective for the Santa Clara River by 2015.

While our agricultural coalition does not oppose such a change as long as the impact of this additional chloride load is fully mitigated, the EIR before you does not disclose or address the issue of the additional chloride load caused by this proposal. The Sanitation District merely proposes that recent rains have somehow permanently reduced salt levels in the water for these projects. Such information is not supported by the facts disclosed in the EIR.

Nor does the EIR seek to mitigate the amount of chlorides in the sanitation district releases that will be produced by the Landmark project and the subsequent Mission Village project that taken together total 6000 units.

Further, it also appears that Newhall planned, but failed to disclose, this waste treatment scenario since the inception of the Newhall Ranch Specific Plan. At the January 18th 2011 Board of Supervisors hearing (agenda item 25), a 2002 contract, made without benefit of CEQA or public disclosure, between Newhall and the Sanitation Districts was referenced for the first time in a staff report. The failure to disclose this contract during the evaluation of the Specific Plan, and thus address its effect on the chloride issue may constitute an attempt to hide information needed by your Board for informed decision making on this subject.

Newhall, working with the Sanitation Districts, claims that there would be no effect from its use of the existing plant. In fact, the DEIRs for both Landmark and Mission Village indicated high chloride levels in wells intended for use in these tracts¹. Such levels would likely not meet the current TMDL for chlorides when household salt loads are added.

Although the Sanitation Districts have been aware of this problem since 1979, they have been slow to address the issue, while the use of imported water and rising salt levels continued in the ensuing decades.

As your Board is undoubtedly aware, the Valencia and Saugus Sewage Treatment plants are already out of compliance with the TMDL for chlorides in the Santa Clara River. After failing to abide by even the compromise agreement worked out in 2008², the Regional Water Quality Boards issued Notices of Violation (attached) to the Sanitation Districts in May of this year.

¹ Mission Village DIER, Appendix 4.8, See Secondary Water Quality Analysis for E Wells, Oct 2010

Re-circulated Landmark Village DEIR, Appendix 4_10q_E wells, See Secondary Water Quality, Jan. 2010

² Alternative Resource Management Plan, approved by RWQCB Resolution No. R4-2008-012. Dec. 2008. Parameters and timetable were outlined in Attachment B to this resolution and attached are attached to our letter

The downstream farming community has made every effort to work with the water and sanitation districts, as well as other agencies in the Santa Clarita Valley, to address this matter in a reasonable and equitable manner while still protecting crop production.

The Newhall Ranch Specific Plan clearly stated that Newhall was to pay for infrastructure expansion.³ The chloride releases from the sanitation plant were not addressed in the Specific Plan because Newhall's use of the Valencia Treatment plant was never discussed. Had it been, your Board would have undoubtedly required mitigation to address this issue.

If Newhall Ranch is allowed to use the Valencia treatment plant, what guarantee is there that it will ever build the Newhall Ranch Sanitation Plant?

We request that this issue be addressed before any further approval is granted, either by: (1) requiring that Newhall build the Newhall Ranch Sanitation Plant as promised in the Specific Plan, or (2) Newhall pay its share of the cost of providing facilities at the Valencia Treatment plant to treat its effluent flow to meet the chloride objective of 100mg/L as it would have had to do for the Newhall Ranch Sanitation permit.

Respectfully submitted,



Robert P. Roy, Chairman

RPR/le

Attachments:

Notice of Violation Saugus Treatment Plant

Notice of Violation Valencia Treatment Plant

Permit Requirements for Chloride TMDL Revision

Cc: Executive Office, Los Angeles County Board of Supervisors, for the Administrative Record

Supervisor Kathy Long, Ventura County

Supervisor Zev Yaroslavsky

Supervisor Don Knabe

Supervisor Gloria Molina

Supervisor Mark Ridley-Thomas

Sam Dea, Planner, Special Projects, Los Angeles County

Debra Smith, Regional Water Quality Control Board

Mike Solomon, General Manager, United Water Conservation District

John Krist, CEO, Farm Bureau of Ventura County

³ SP Condition 4.11-8



California Regional Water Quality Control Board Los Angeles Region



320 West Fourth Street, Suite 200, Los Angeles, California 90013

(213) 576-6600 • Fax (213) 576-6640

<http://www.waterboards.ca.gov/losangeles>

Linda S. Adams
Acting Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

May 27, 2011

Mr. Stephen R. Maguin
Chief Engineer and General Manager
County Sanitation Districts of Los Angeles County
1955 Workman Mill Road
Whittier, California 90607-4998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. 7010 3090 0002 1022 3824

Dear Mr. Maguin:

NOTICE OF VIOLATION - SANTA CLARITA VALLEY SANITATION DISTRICT OF LOS ANGELES COUNTY, SAUGUS WATER RECLAMATION PLANT (ORDER NO. R4-2009-0075 NPDES NO. CA0054313, CI 2960)

Santa Clarita Valley Sanitation District of Los Angeles County (hereinafter Discharger or SCVSD, formerly referred to as Los Angeles County Sanitation District), discharges wastewater pursuant to Order No. R4-2009-0075 and National Pollutant Discharge Elimination System (NPDES) Permit No. CA0054313 (Order), which was adopted by the California Regional Water Quality Control Board, Los Angeles Region (Regional Board).

The Order authorizes the Discharger to discharge up to 6.5 MGD of tertiary-treated wastewater from the Saugus Water Reclamation Plant (hereinafter Facility). The Order sets forth waste discharge requirements, including effluent limits, and a monitoring and reporting program (MRP CI-2960) that apply to the discharges of pollutants from the Facility. This wastewater contains chlorides and other pollutants that can degrade water quality and impact beneficial uses of water, and that are defined as wastes under the Porter-Cologne Water Quality Control Act (Cal. Wat. Code § 13000 et seq.). The treated wastewater is discharged to the Santa Clara River, a navigable water of the United States.

MRP CI-2960 requires that the Discharger submit self-monitoring reports, discharge monitoring reports, and an annual summary report to this Regional Board in compliance with all Standard Provisions related to monitoring, reporting, and recordkeeping.

Provision VI.C.8, on page 40 of the Order reads: "The discharger shall comply with the applicable TMDL-related tasks¹, and future revisions thereto, in Attachment K of this Order."

¹ The Upper Santa Clara River Chloride TMDL was approved by the Regional Board, the State Water Resources Control Board, the State Office of Administrative Law (OAL), and the U.S. EPA, and became effective on April 6, 2010. The USCR Chloride TMDL Implementation Plan, including Task 17(a), was accommodated into Order No. R4-2009-0075 and NPDES Permit No. CA0054313 on June 4, 2009 and became effective on July 24, 2009.

Attachment K lists the TMDL tasks. Page K-3 lists Task 17(a).

You are hereby notified that the Discharger is out of compliance with requirements established in the Order and has violated California Water Code section 13383 for failure to complete Task 17(a) in Attachment K as follows:

- Failure to complete a Programmatic Environmental Impact Report (EIR) for facilities to comply with final permit effluent limits for chloride. The Discharger submitted a copy of a Notice of Exemption from the requirement to prepare an EIR or Negative Declaration to the Regional Board on May 2, 2011. The Notice of Exemption does not meet the requirements of Task 17(a) in Attachment K because it does not constitute a programmatic EIR and it addresses actions to meet the conditional wasteload allocations (WLAs) not actions to meet the final effluent limits for chloride.
- Failure to submit an adequate Wastewater Facilities Plan for facilities to comply with final permit effluent limits for chloride. The Santa Clarita Valley Chloride TMDL Facilities Plan (Facilities Plan) submitted by the SCVSD on May 2, 2011 is inadequate because it is not a plan for actions to meet the final effluent limits for chloride of 100 mg/L. If the Facilities Plan was intended to comply with the conditional WLAs in the TMDL, it is inadequate because it does not provide the facilities necessary to allow application of conditional WLAs.

You are required to comply immediately with the following tasks:

1. Ensure that Task 17(a) in Attachment K is completed and the Wastewater Facilities Plan and Programmatic Environmental Impact Report for facilities to comply with final permit effluent limits for chloride are submitted to the Regional Board.
2. Ensure full implementation of all requirements contained in MRP CI-2960.
3. Submit a written response (1) confirming you have corrected these violations with a brief description of how you have corrected them, or (2) identifying when you will have completed correcting these violations and a brief description of how you will correct them. Submit your written response by June 27, 2011 to:

Jenny Newman
Chief, TMDL Unit 3
California Regional Water Quality Control Board
Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013- 2343

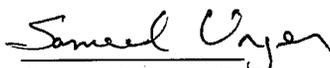
Pursuant to CWC § 13385, you are subject to administrative civil liability of up to \$10,000 for each day in which the violation occurs plus \$10 multiplied by the number of gallons by which the volume discharged but not cleaned up exceeds 1,000 gallons. These civil liabilities may be assessed by the Regional Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.

The matter may be referred to the Attorney General for further enforcement. In such case, the Attorney General may seek up to \$25,000 per day and \$25 per gallon. The Regional Board reserves its right to take any further enforcement action authorized by law.

In SCVSD's semi-annual status reports submitted on November 4, 2010, and May 2, 2011, SCVSD requested to use the reconsideration clause under Task 16 of the Upper Santa Clara River Chloride TMDL implementation plan to revise the TMDL to incorporate the Alternative Compliance Plan (ACP). The intent of the reconsideration clause under Task 16 is to consider extending the implementation schedule to implement control measures necessary to meet final conditional WLAs, not to revise the conditional WLAs to accommodate the ACP, as requested by SCVSD. Therefore, Regional Board staff is hereby declining to recommend to the Board a reconsideration under Task 16.

If you have any questions regarding this matter, please contact Jenny Newman at (213) 576-6691 or at jnewman@waterboards.ca.gov.

Sincerely,


Samuel Unger, P.E.
Executive Officer

cc: Julie Macedo, Office of Enforcement, State Water Resources Control Board
Frances McChesney, Office of Chief Counsel, State Water Resources Control Board



California Regional Water Quality Control Board Los Angeles Region



Linda S. Adams
Acting Secretary for
Environmental Protection

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Edmund G. Brown Jr.
Governor

May 27, 2011

Mr. Stephen R. Maguin
Chief Engineer and General Manager
County Sanitation Districts of Los Angeles County
1955 Workman Mill Road
Whittier, California 90607-4998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. 7010 3090 0002 1022 3817

Dear Mr. Maguin:

NOTICE OF VIOLATION - SANTA CLARITA VALLEY SANITATION DISTRICT OF LOS ANGELES COUNTY, VALENCIA WATER RECLAMATION PLANT (ORDER NO. R4-2009-0074 NPDES NO. CA0054216, CI 4993)

Santa Clarita Valley Sanitation District of Los Angeles County (hereinafter Discharger or SCVSD, formerly referred to as Los Angeles County Sanitation District), discharges wastewater pursuant to Order No. R4-2009-0074 and National Pollutant Discharge Elimination System (NPDES) Permit No. CA0054216 (Order), which was adopted by the California Regional Water Quality Control Board, Los Angeles Region (Regional Board).

The Order authorizes the Discharger to discharge up to 21.6 MGD of tertiary-treated wastewater from the Valencia Water Reclamation Plant (hereinafter Facility). The Order sets forth waste discharge requirements, including effluent limits, and a monitoring and reporting program (MRP CI-4993) that apply to the discharges of pollutants from the Facility. This wastewater contains chlorides and other pollutants that can degrade water quality and impact beneficial uses of water, and that are defined as wastes under the Porter-Cologne Water Quality Control Act (Cal.Wat. Code § 13000 et seq.). The treated wastewater is discharged to the Santa Clara River, a navigable water of the United States.

MRP CI-4993 requires that the Discharger submit self-monitoring reports, discharge monitoring reports, and an annual summary report to this Regional Board in compliance with all Standard Provisions related to monitoring, reporting, and recordkeeping.

Provision VI.C.8, on page 41 of the Order reads: "The discharger shall comply with the applicable TMDL-related tasks¹, and future revisions thereto, in Attachment K of this Order."

¹ The Upper Santa Clara River Chloride TMDL was approved by the Regional Board, the State Water Resources Control Board, the State Office of Administrative Law (OAL), and the U.S. EPA, and became effective on April 6, 2010. The USCR Chloride TMDL Implementation Plan, including Task 17(a), was accommodated into Order No. R4-2009-0074 and NPDES Permit No. CA0054216 on June 4, 2009 and became effective on July 24, 2009.

Attachment K lists the TMDL tasks. Page K-3 lists Task 17(a).

You are hereby notified that the Discharger is out of compliance with requirements established in the Order and has violated California Water Code section 13383 for failure to complete Task 17(a) in Attachment K as follows:

- Failure to complete a Programmatic Environmental Impact Report (EIR) for facilities to comply with final permit effluent limits for chloride. The Discharger submitted a copy of a Notice of Exemption from the requirement to prepare an EIR or Negative Declaration to the Regional Board on May 2, 2011. The Notice of Exemption does not meet the requirements of Task 17(a) in Attachment K because it does not constitute a programmatic EIR and it addresses actions to meet the conditional wasteload allocations (WLAs) not actions to meet the final effluent limits for chloride.
- Failure to submit an adequate Wastewater Facilities Plan for facilities to comply with final permit effluent limits for chloride. The Santa Clarita Valley Chloride TMDL Facilities Plan (Facilities Plan) submitted by the SCVSD on May 2, 2011 is inadequate because it is not a plan for actions to meet the final effluent limits for chloride of 100 mg/L. If the Facilities Plan was intended to comply with the conditional WLAs in the TMDL, it is inadequate because it does not provide the facilities necessary to allow application of conditional WLAs.

You are required to comply immediately with the following tasks:

1. Ensure that Task 17(a) in Attachment K is completed and the Wastewater Facilities Plan and Programmatic Environmental Impact Report for facilities to comply with final permit effluent limits for chloride are submitted to the Regional Board.
2. Ensure full implementation of all requirements contained in MRP CI-4993.
3. Submit a written response (1) confirming you have corrected these violations with a brief description of how you have corrected them, or (2) identifying when you will have completed correcting these violations and a brief description of how you will correct them. Submit your written response by June 27, 2011 to:

Jenny Newman
Chief, TMDL Unit 3
California Regional Water Quality Control Board
Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013- 2343

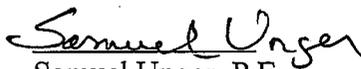
Pursuant to CWC § 13385, you are subject to administrative civil liability of up to \$10,000 for each day in which the violation occurs plus \$10 multiplied by the number of gallons by which the volume discharged but not cleaned up exceeds 1,000 gallons. These civil liabilities may be assessed by the Regional Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.

The matter may be referred to the Attorney General for further enforcement. In such case, the Attorney General may seek up to \$25,000 per day and \$25 per gallon. The Regional Board reserves its right to take any further enforcement action authorized by law.

In SCVSD's semi-annual status reports submitted on November 4, 2010, and May 2, 2011, SCVSD requested to use the reconsideration clause under Task 16 of the Upper Santa Clara River Chloride TMDL implementation plan to revise the TMDL to incorporate the Alternative Compliance Plan (ACP). The intent of the reconsideration clause under Task 16 is to consider extending the implementation schedule to implement control measures necessary to meet final conditional WLAs, not to revise the conditional WLAs to accommodate the ACP, as requested by SCVSD. Therefore, Regional Board staff is hereby declining to recommend to the Board a reconsideration under Task 16.

If you have any questions regarding this matter, please contact Jenny Newman at (213) 576-6691 or at jnewman@waterboards.ca.gov.

Sincerely,


Samuel Unger, P.E.
Executive Officer

cc: Julie Macedo, Office of Enforcement, State Water Resources Control Board
Frances McChesney, Office of Chief Counsel, State Water Resources Control Board

Introduction

By letter dated September 23, 2011, the Ventura County Agricultural Water Quality Coalition (Coalition) submitted a letter to the Los Angeles County Board of Supervisors addressing the Landmark Village Recirculated Draft EIR. County staff reviewed the letter and prepared a written response that was provided to the Board in advance of the public hearing held October 4, 2011 to consider the Landmark Village project.

Although the Coalition's comments were not submitted in connection with the County's review of the Mission Village project, the letter refers to Mission Village and the Draft EIR. Accordingly, while the Coalition's comments were submitted as part of the Landmark Village project, County staff has prepared the following responses for the Board's information.

Response to Comments regarding Interim Use of Valencia Water Reclamation Plant

The Coalition's comment letter, page 1, first two paragraphs, refers to the Los Angeles County Board of Supervisors' certification of the Newhall Ranch environmental documentation on May 27, 2003, and the Newhall Ranch Water Reclamation Plant (WRP) to be built to serve the Specific Plan. The comment also refers to the "permit, granted in 2007." The comment claims that the temporary discharge of Newhall Ranch wastewater to the existing Valencia WRP from the first 6,000 homes in Newhall Ranch's Mission Village and Landmark Village would "elevate the chloride load rather than reducing it."

In response, first, the Coalition's reference to the "permit granted in 2007" likely is referring to the Newhall Ranch WRP National Pollutant Discharge Elimination System (NPDES) Permit No. CA0064556, which established effluent limitations and discharge specifications for the Newhall Ranch WRP, and the chloride effluent limitation in that permit is 100 mg/L. (Please also refer to the Mission Village Final EIR (October 2011), Volume VIII, **Topical Response 5: Chloride** for additional responsive information.) (Note that Topical Responses from the Final EIR referenced in this response are presented in a separate section entitled "Referenced Topical Responses from the Mission Village Final EIR (October 2011).")

Second, the County does not concur with the Coalition's statement that the applicant's interim use of the existing Valencia WRP to treat Newhall Ranch wastewater from the first 6,000 homes in Newhall Ranch's Landmark Village and Mission Village would "elevate" the chloride load into the Santa Clara River. As to this statement, the Coalition, which includes public agencies as members, has not provided specific documentation to support the comment as required by the California Environmental Quality Act (CEQA) (see Cal. Code Regs. tit. 14, §21153, subd. (c)). In addition, the Coalition's statement is not consistent with the information presented in the Sanitation Districts of Los Angeles County's technical memorandum,

dated March 8, 2011, which was included in the Mission Village Final EIR (May 2011), **Appendix F4.22** (Districts' memorandum). The Districts' memorandum shows that discharge of Newhall Ranch wastewater to the Valencia WRP from the first 6,000 homes in Newhall Ranch's Mission Village and Landmark Village would be temporary until construction of the Newhall Ranch WRP. Temporary treatment of wastewater at the Valencia WRP also would not eliminate the need for the developer (Newhall Land) to construct the Newhall Ranch WRP; and prior to building more than 6,000 homes, Newhall Land must construct the new plant. The temporary use of the Valencia WRP addresses practical engineering considerations such as the need to build up an adequate and steady flow of wastewater before startup of the Newhall Ranch WRP. The chloride concentrations of the Newhall Ranch and the Santa Clarita Valley Sanitation District, or SCVSD, wastewater are expected to be similar; thus, temporary treatment of Newhall Ranch wastewater at the Valencia WRP would not change the SCVSD's ability to comply with the chloride Total Maximum Daily Load (TMDL). As stated by the Districts in its March 8, 2011 memorandum:

“As noted in the Item 1 and 4 responses, temporary treatment of Landmark Village and Mission Village wastewater at the VWRP would not eliminate the need for the developer to construct the NRWRP and to finance the new sewerage system, nor would it impact compliance with the Chloride TMDL. As presented in the Item 2 response, the VWRP has available capacity for temporary treatment of Landmark Village and Mission Village wastewater. Thus, no negative impact to the SDVSD's sewerage system is expected, and this approach does not conflict with the Specific Plan's requirement for construction of the NRWRP.” (Mission Village Final EIR (May 2011), **Appendix F4.22** [Districts' memorandum, dated March 8, 2011, p. 5].)

In addition, based on the Districts' memorandum, the Districts have advised the County that the discharge of Newhall Ranch wastewater to the Valencia WRP would produce *similar* increases in chloride concentrations when compared to existing Santa Clarita Valley communities; therefore, there would be no negative impact to the SCVSD's sewerage system or its ability to comply with the chloride TMDL:

“When operating at flows equal to or below the permitted plant capacity, compliance with the Chloride TMDL will depend on the chloride concentration in the treatment plant effluent. This concentration results from two primary sources: chloride concentration of the local water supply, and increased chloride concentration due to use of the water by the community. Local groundwater is the planned potable water source for the Specific Plan's Landmark and Mission Villages, the two developments whose wastewater might be temporarily treated at the VWRP under the Interconnection Agreement. The groundwater chloride levels for those communities are similar to that of the groundwater used by existing Santa Clarita Valley communities. Thus, no difference in chloride concentration is expected due to the water supply.

Like Santa Clarita, Newhall Ranch will be a mixture of residential, commercial and industrial land uses. Use of automatic water softeners (AWS) was a significant chloride

source for SCVSD wastewater prior to the 2008 ban on AWS. Per Specific Plan mitigation measure 5.0-52(b), the Newhall Ranch developer must request that [the Newhall Ranch Sanitation District (NRSD)] ban AWS in Newhall Ranch. Districts' staff will also recommend that NRSD enact an AWS ban similar to the ban in the SCVSD. Consequently, the two communities are expected to produce similar increases in chloride concentrations due to use and similar overall wastewater chloride concentrations. Since final compliance will be determined by concentration, the addition of Newhall Ranch wastewater to the VWRP would neither add to nor alleviate the SCVSD's financial burden to comply with the Chloride TMDL." (See Mission Village Final EIR (May 2011), **Appendix F4.22** [Districts' memorandum, dated March 8, 2011, p. 2].)

The Mission Village Final EIR, **Section 4.22, Water Quality**, and the associated Water Quality Technical Report (2011), prepared by Geosyntec Consultants, also provide technical analyses and support for the Districts' determination. In addition, responsive information is provided in the Mission Village Final EIR (October 2011), Volume VIII, **Topical Response 4: Revised Project Design; Topical Response 5: Chloride**; and Final EIR (May 2011), Volume I, **Topical Response 6: Water Quality**. The County elects to rely on this body of evidence in lieu of the Coalition's statements.

Response to Comments regarding Claims that Interim Use of the Valencia WRP would Impede the Chloride TMDL Requirements

In the comment letter, page 1, last paragraph, and page 2, first paragraph, the Coalition states that several additional environmental documents have been completed for various permits needed for Newhall Ranch, including formation of the Newhall Ranch Sanitation District and the EIS/EIR for the Newhall Ranch Resource Management and Development Plan and the Spineflower Conservation Plan (RMDP/SCP), and that these documents refer to construction of the Newhall Ranch WRP that will meet the chloride TMDL. The comment states that the applicant (Newhall Land) now proposes to discharge Newhall Ranch wastewater (first 6,000 homes from Mission Village and Landmark Village) to the Valencia WRP "instead of meeting their requirement to build a new plant." The comment states that such a proposal would seem to "severely impede the RWQCB requirement to meet the chloride TMDL for the Santa Clara River by 2015."

In response, first, the referenced process leading to the County's formation of the new sanitation district (Newhall Ranch Sanitation District) disclosed the temporary use of the existing Valencia WRP in the Department of Public Works' staff report to the Board of Supervisors, dated December 1, 2005, pp. 3-4; and the same Department's staff report to the Board, dated January 18, 2011, p. 3, both of which are incorporated by reference and available for public review and inspection upon request to the County Department of Regional Planning.

Second, as stated above, temporary use of the Valencia WRP for treatment of the Mission Village and Landmark Village wastewater (up to 6,000 homes) does not eliminate the Specific Plan requirement for

the developer (Newhall Land) to both construct the Newhall Ranch WRP and finance the new sewerage system for the Specific Plan area. For further information responsive to this comment, please refer to Mission Village Final EIR (October 2011), Volume VIII, **Topical Response 5: Chloride**, and the Districts' memorandum dated March 8, 2011 (see Mission Village Final EIR (May 2011), **Appendix F4.22**).

Third, the Mission Village Final EIR (October 2011) already addressed the broader issues of compliance with the chloride TMDL; please see **Topical Response 5: Chloride**. The Mission Village Final EIR, **Topical Response 4: Revised Project Design**, also evaluated the interim use of the Valencia WRP, taking into account overall environmental and cost considerations. The topical response: (a) provided background information regarding the chloride TMDL governing the Upper Santa Clara River; (b) summarized the Santa Clarita Valley Sanitation District's WRP permitting and operations; (c) assessed Newhall Ranch's interim use of the existing Valencia WRP; (d) summarized existing chloride concentrations at the Valencia WRP; (e) addressed cost implications for the temporary discharges to the Valencia WRP; and (f) provided a summary of Santa Clarita Valley Sanitation District's response to the administrative Notices of Violation it received from the Regional Water Quality Control Board, Los Angeles Region. The topical response also evaluated the potential significant environmental impacts associated with the interim chloride reduction facilities that would further treat the wastewater from Landmark Village and Mission Village, if needed, until such time as the first phase of the Newhall Ranch WRP is constructed. Based on that information, the County has determined that the interim use of the Valencia WRP, as proposed, would not impede the Santa Clarita Valley Sanitation District's ability to meet the chloride TMDL requirements.

Responses to Comment regarding the Coalition's Position

In the comment letter, page 2, second paragraph, the Coalition states that the Coalition does not oppose "such a change" as long as the impact resulting from the referenced "change" is fully mitigated. Further, the Coalition states that the Landmark Village Final EIR "does not disclose or address the issue of the additional chloride load caused by its proposal," and states that the Santa Clarita Valley Sanitation District has not satisfactorily responded to the chloride issues presented. County staff will address this comment in the context of the Mission Village Final EIR.

First, the County is not proposing to "change" the ultimate treatment of wastewater from the Newhall Ranch Specific Plan. As stated above, the applicant (Newhall Land), in coordination with the Santa Clarita Valley Sanitation District, has proposed the temporary use of the Valencia WRP for treatment of Newhall Ranch wastewater (i.e., the first 6,000 homes in Landmark Village and Mission Village), and this temporary usage does not eliminate the Specific Plan requirement for Newhall Land to construct the Newhall Ranch WRP and finance the new sewerage system for the Specific Plan area. As stated, the

temporary use of the Valencia WRP addresses practical engineering considerations, and is *not* a change that eliminates construction of the Newhall Ranch WRP. For further responsive information, please see the Mission Village Final EIR (October 2011), **Topical Response 5: Chloride**, and the Districts' memorandum dated March 8, 2011 (see Mission Village Final EIR (May 2011), **Appendix F4.22**).

In addition, the Mission Village project's interim wastewater treatment and capacity were addressed in the Mission Village Final EIR (May 2011), **Section 4.9, Wastewater Disposal**. Beginning on page 4.9-11, the Final EIR states:

"As previously discussed, the long-range plan is for the Newhall Ranch WRP to be constructed exclusively to serve uses within Newhall Ranch. The new WRP's capacity would be 6.8 mgd, with a maximum flow of 13.8 mgd. A new County sanitation district has been formed and is known as the Newhall Ranch County Sanitation District or NRCSD. Project generated wastewater, 0.695884 mgd, would be treated by the NRCSD at the Newhall Ranch WRP, although interim treatment at the Valencia WRP would occur under some of the wastewater treatment scenarios as described below. Project generated wastewater of approximately 0.26641 mgd would be treated at the Valencia WRP permanently. As the planned treatment capacity of the Newhall Ranch WRP would be sufficient to treat wastewater flows from the entire Specific Plan project, no significant long-term operational impacts would result from the treatment of wastewater generated by the Mission Village project.

~~However,~~ Until the Newhall Ranch WRP construction is completed and the plant is operational, on an interim basis, three wastewater disposal options are available to treat the majority of the wastewater generated by the proposed project. One scenario, as shown in Figure 1.0-32, Mission Village Wastewater System – Scenario 1, provides for the construction of an initial phase of the Newhall Ranch WRP to serve the Mission Village subdivision project. Under this scenario, buildout of the WRP would occur over time as demand for treatment increases due to subsequent development of the Newhall Ranch Specific Plan. The second scenario, as shown in Figure 1.0-33, Mission Village Wastewater System – Scenario 2, provides for an option should the Newhall Ranch WRP not yet be constructed. In this scenario, flows would be piped across the Commerce Center Drive Bridge to an interim pump station north of the Santa Clara River along the utility corridor where wastewater would be pumped back to an existing CSDLAC pump station, then to the existing Valencia WRP, located upstream of the project site along I-5. The pump station would be used until such time as the first phase of the Newhall Ranch WRP is constructed- and operational. The third scenario, as shown in Figure 1.0-34, Mission Village Wastewater System – Scenario 3, is an interim option that would be implemented in the event that the Commerce Center Drive Bridge is not constructed prior to the occupancy of new land uses on the Mission Village project site. Under this scenario, an interim pump station would be constructed near the intersection of "GG" Street and Commerce Center Drive that would pump effluent to the existing Valencia WRP, which is located approximately 0.5 mile east of the project site along I-5. Under this scenario, a force main from the interim pump station on the project site to the proposed sewer mainline in Magic Mountain Parkway would be constructed. This proposed sewer mainline would connect with an existing line at the intersection of The Old Road and

Magic Mountain Parkway. As with Scenario 2 described above, wastewater from the Mission Village project would continue to be pumped temporarily to the Valencia WRP until such time as the first phase of the Newhall Ranch WRP is constructed and operational, consistent with the Interconnection Agreement. The available capacity under each of these three treatment scenarios is discussed below.

(a) Treatment Scenario 1

Project generated wastewater requiring treatment has been calculated at approximately ~~1.130.96~~ mgd. At buildout, the treatment capacity of the Newhall Ranch WRP would be 6.8 mgd, with a maximum flow of 13.8 mgd. The Newhall Ranch WRP has been designed to serve the buildout of the Newhall Ranch Specific Plan area, of which Mission Village is a part. Under this treatment scenario, the first phase of the WRP would be sufficiently sized to accommodate wastewater from the Mission Village project. The WRP was conditioned by the Board of Supervisors to be designed and constructed to the standards of CSDLAC and state standards and requirements. In addition, the Valencia WRP would be able to accommodate the approximately 0.266 mgd of wastewater from the project that will permanently be treated at this facility. As a result, no significant operational impacts would occur under this scenario.

(b) Treatment Scenario 2

Under this scenario, an interim pump station would be constructed along the utility corridor to pump wastewater via pipeline to the Valencia WRP. As a result of CSDLAC future wastewater generation estimates, CSDLAC proposed a two-phase plan to expand the SCVSD treatment facilities, which include the Valencia WRP, to meet anticipated future wastewater disposal needs of 34.42 mgd.¹ The most recent phase was completed in May 2005 and expanded treatment capacity by approximately 9 mgd, or approximately 47 percent, to the current total treatment capacity of approximately 28.1 mgd. Based on population projections ~~published in from~~ the SCAG 2004 Regional Transportation Plan, 2008, the previously approved Stage VI expansion of the Valencia WRP is not expected to be needed until approximately 2021 and the site build-out capacity of 34.2 mgd is not expected to be reached until 2033.² ~~has adequate capacity through the year 2015. Another phase (Stage VI) expansion would increase capacity by 6 mgd, but will not be constructed until flow materializes. According to recent SCVSD flow projections based on the SCAG 2008 Regional Transportation Plan, the previously approved Stage VI expansion at the Valencia WRP is not expected to be needed until approximately 2021 and the site buildout capacity of 34.2 mgd is not expected to be reached until approximately 2033.~~ Consequently, the planned short-term use of the Valencia WRP to treat ~~1.130.96~~ mgd of the project's wastewater is expected to have no impact on future expansion of the SCVSD facilities. In addition, the Valencia WRP would

¹ To the extent required, the SCVSD may utilize the Mission Village EIR or the Landmark Village EIR, as necessary, if one of the above Valencia WRP sewer options is selected an one or both of the project EIRs are certified by the County's Board of Supervisors.

² CSDLAC comment letter to Carolina Blengini, Los Angeles County Department of Regional Planning, dated November 17, 2010.

be able to accommodate the approximately 0.266 mgd of wastewater from the project that will permanently be treated at this facility.

Additionally, as stated earlier, numerous safeguards exist within the County's project approval process to ensure available treatment capacity, including, as noted above, that connection permits for new development are not issued if there is not sufficient capacity. Moreover, mitigation adopted by the County as part of its approval of the Specific Plan provides that prior to recordation of each subdivision permitting construction; the applicant is required to obtain a letter from the new County sanitation district stating that treatment capacity will be adequate for that subdivision (Mitigation Measure SP 4.12-4). As a result, no significant operational impacts would occur under this scenario.

(c) Treatment Scenario 3

Similar to Scenario 2, under this scenario wastewater from the Mission Village project would be conveyed to SCVSD and, as discussed immediately above, the planned short-term use of the Valencia WRP to treat the project's wastewater can be accommodated, as well as the permanent treatment of approximately 0.266 mgd of project wastewater. For this reason, no significant operational impacts would occur under this scenario." ³ (Mission Village Final EIR (May 2011), Volume II, **Section 4.9, Wastewater Disposal**, pp. 4.9-11-14; see also Final EIR, Section 1.0, Project Description, pp. 1.0-69-70a.)

In addition, the Santa Clarita Valley Sanitation District has responded fully to chloride claims advanced concerning interim use of its Valencia WRP. Please see the Mission Village Final EIR (May 2011), **Appendix F4.22** (Districts' memorandum, dated March 8, 2011). For further responsive information, please refer to the Mission Village Final EIR (October 2011), **Topical Response 4: Revised Project Design**; and **Topical Response 5: Chloride**.

Responses to Comments regarding the Mitigation of Chlorides

The Coalition states that the Landmark Village EIR does not "seek to mitigate the amount of chlorides in the sanitation district releases that will be produced by the Landmark project and the subsequent Mission Village project that taken together total 6,000 units." County staff will address the comment in the context of the Mission Village Final EIR. The County does not concur with this statement.

The Mission Village Final EIR (October 2011), **Topical Response 4: Revised Project Design**, thoroughly addresses the various issues associated with interim use of the Valencia WRP. The Final EIR makes clear that the project applicant (Newhall) has identified interim chloride reduction treatment at the Valencia WRP, so that interim chloride reduction would be achieved and be equivalent to that of the Newhall Ranch WRP under that NPDES Permit (100 mg/L):

³ The above double-underline and strike-out text reflects the changes that were made between the Draft and Final EIR, in response to comments.

“In addition, and as explained in this response, to confirm full and complete compliance with the chloride TMDL, Newhall has identified interim chloride reduction treatment at the Valencia WRP. This involves chloride treatment of the effluent amount originating from Newhall Ranch (up to 6,000 dwelling units) at the Valencia WRP during the operation period of the 2002 Interconnection Agreement. The result is that the project effluent discharged to the Santa Clara River through the permitted Valencia WRP outfall would result in discharge equivalent to 100 mg/L chloride (or other applicable standard), which is the chloride effluent treatment standard under the Newhall Ranch WRP NPDES permit (NPDES No. CA0064556, Order No. R4-2007-0046). This additional treatment process would remove chloride from the Newhall Ranch effluent at the Valencia WRP, so that the interim chloride reduction would be equivalent to that of the Newhall Ranch WRP under the Newhall Ranch WRP Permit (100 mg/L).” (Mission Village Final EIR [October 2011], **Topical Response 4: Revised Project Design**, pp. TR-4-25-26.)

Responses to Comments regarding Disclosure of Interim Wastewater Treatment

The Coalition states that the applicant (Newhall Land) has failed to disclose the interim wastewater “treatment scenario since the inception of the Specific Plan” and that the January 18, 2011 Board hearing (Agenda Item No. 25) was the first time the 2002 Interconnection Agreement was disclosed. In addition, the comment states that the failure to disclose the Interconnection Agreement “may constitute an attempt to hide information needed by your Board” for informed decision making on this subject. The County does not concur with these comments.

The formation of a new sanitation district was identified in the previously-certified Newhall Ranch Specific Plan environmental documentation as a mitigation measure, and the Interconnection Agreement was developed to establish a logical plan for the development and administration of the new sanitation district and its infrastructure. As explained below, the Interconnection Agreement was not “hidden” from view.

To the contrary, on January 9, 2002, at its regular meeting, the Districts' Board considered and approved entering into the Interconnection Agreement. In accordance with the Brown Act, the Districts gave notice and posted the Board agenda, which also was available online, prior to the January 9 meeting. The meeting was open to the public. The Districts' records show no one opposed the Districts' authorization of the Interconnection Agreement. If there was any objection to the Districts entering into the Interconnection Agreement at that time, the objection should have been lodged prior to or at the time of the meeting.

Further, the Interconnection Agreement was referenced in previous County staff reports supporting formation of the new Newhall Ranch Sanitation District (see, for example, Department of Public Works staff report to the Board of Supervisors, dated December 1, 2005, pp. 3-4; and the Department's staff report to the Board dated January 18, 2011, p. 3, both of which are incorporated by reference).

Based on the above, the Interconnection Agreement was evaluated publicly and no information was “hidden” from the public or the decision makers.

For further responsive information, please see the Mission Village Final EIR (October 2011), **Section 1.0, Project Description**, pp. 1.0-69-70a; **Topical Response 4: Revised Project Design; Topical Response 5: Chloride**; and see Mission Village Final EIR (May 2011), **Appendix F4.22** (Districts' memorandum dated March 8, 2011, and Interconnection Agreement).

Responses to Comments regarding Chloride Levels and Chloride TMDL

The Coalition states that “Newhall, working with the Sanitation Districts, claims that there would be no effect from its use of the existing plant,” but that the Draft EIRs for both Landmark and Mission Villages indicate “high chloride levels in wells intended for use in these tracts” and that such levels “would not meet the current TMDL for chlorides when household salt loads are added.”

As to the statement that chloride levels in local groundwater wells intended for use in serving the Landmark and Mission Villages indicate “high chloride levels,” the Mission Village Final EIR indicates that such a statement is not correct. Chloride concentration is the main parameter in assessing compliance with the chloride TMDL and results from two inputs: chloride concentration of the water supply and increased chloride concentration due to the community. Local groundwater is the planned potable water source for the Specific Plan’s Landmark and Mission Villages, the two developments whose wastewater is allowed to be temporarily treated at the Valencia WRP under the Interconnection Agreement. The quality of groundwater near the Mission Village site is addressed in the Final EIR, **Section 4.8, Water Service**. As stated in the Draft EIR, at page 4.8-62:

“(5) Groundwater Quality Near the Mission Village Site

The quality of the groundwater available from the Alluvial aquifer near the Mission Village project site has been tested. Results from laboratory testing conducted for Valencia Water Company wells expected to serve the Mission Village project site or very near the Mission Village site are provided in Draft EIR **Appendix 4.8**. The tested well[s] are approved by DPH and are located north of the Mission Village site in the Valencia Commerce Center. Laboratory testing conducted in July 2009 indicates that all constituents tested were at acceptable levels for drinking water under Title 22. This Draft EIR also includes a summary of water quality compliance monitoring results for Valencia Commerce Center Well E-15 from 2006 to 2009. This information indicates that water in this well complies with all federal and state drinking water regulations (see **Appendix 4.8** for 2009 laboratory test water well results). Tests conducted for perchlorate indicated non-detect. *The Santa Clarita Valley 2010 Water Quality Report* also shows that water supplies provided by the Valencia Water Company, including water from the Commerce Center wells, meet Title 22 standards for drinking water.” (*Id.*)

The data also shows that the groundwater chloride levels from existing groundwater wells are well within the effluent limitation standards for chloride, and are similar to the groundwater chloride levels in the Santa Clarita Valley, as reported on page 3 of the "Santa Clarita Valley 2010 Water Quality Report," a copy of which is included in Final EIR (October 2011), **Appendix 4.8A(A)**.

For further information responsive to this comment, please see Mission Village Final EIR (October 2011), **Topical Response 5: Chloride**. Los Angeles County appreciates your comments and they will be made available to the decision makers prior to a final decision on the proposed project.

Responses to Comments regarding Santa Clarita Valley Sanitation District Response to Chloride Issues

The Coalition states that the Santa Clarita Valley Sanitation District has been aware of the chloride "problem since 1979," but it has been "slow to address the issue, while use of imported water and rising salt levels continued in the ensuing decade."

The County believes that the Santa Clarita Valley Sanitation District has been responsive to the subject of chloride. For responsive information, please refer to the Mission Village Final EIR (October 2011), **Topical Response 4: Revised Project Design**, pp. TR-4-15 - TR-4-26; and **Topical Response 5: Chloride**, pp TR-5-3 - TR-5-19.

Responses to Comments regarding Compliance with the Chloride TMDL

The Coalition states that the Santa Clarita Valley Sanitation District's Valencia and Saugus WRPs are "already out of compliance with the TMDL for chlorides in the Santa Clara River" and that it has failed to abide by the "Alternative Resource Management Plan" approved by the RWQCB; and therefore, the RWQCB has issued notices of violation.

In response, the County submits that the Santa Clarita Valley Sanitation District's regional efforts are well beyond the scope of a project-level EIR; nonetheless, the County understands that the Santa Clarita Valley Sanitation District is not currently "out of compliance" with the chloride TMDL.

As background, the RWQCB has developed and adopted an amended chloride TMDL. The chloride TMDL is part of the Basin Plan.

The RWQCB first adopted a TMDL for chloride in the Upper Santa Clara River in October 2002 (Resolution No. 2002-018). On May 6, 2004, the RWQCB amended the Upper Santa Clara River chloride TMDL to revise the interim wasteload allocations (WLAs) and implementation schedule (Resolution 04-004). The amended TMDL was approved by the State Water Resources Control Board (SWRCB), Office of

Administrative Law, and the USEPA, and became effective on May 4, 2005. The chloride TMDL requires that chloride levels in WRP effluent not exceed 100 mg/L.

At the time the TMDL was adopted and approved, there were key scientific uncertainties regarding the sensitivity of crops to chloride and the complex interactions between surface water and groundwater in the Upper Santa Clara River watershed. The TMDL recognized the possibility of revised chloride water quality objectives (WQO) and included mandatory reconsiderations by the RWQCB to consider Site Specific Objectives (SSO). The TMDL required the County Sanitation Districts to implement special studies and actions to reduce chloride loadings from the Saugus and Valencia WRPs. The TMDL included the following special studies to be considered by the RWQCB:

- Literature Review and Evaluation (LRE) -- review agronomic literature to determine a chloride threshold for salt sensitive crops.
- Extended Study Alternatives (ESA) -- identify agricultural studies, including schedules and costs, to refine the chloride threshold.
- Endangered Species Protection (ESP) -- review available literature to determine chloride sensitivities of endangered species in the Upper Santa Clara River.
- Groundwater and Surface Water Interaction Study (GSWI) -- determine chloride transport and fate from surface waters to groundwater basins underlying the Upper Santa Clara River.
- Conceptual Compliance Measures -- identify potential chloride control measures and costs based on different hypothetical WQO and final WLA scenarios.
- Site Specific Objectives and Antidegradation Analysis -- consider a site-specific objective for chloride based on the results of the agricultural chloride threshold study and the GSWI.

The TMDL special studies were conducted in a facilitated process in which stakeholders participated in scoping and reviewing the studies. This process resulted in an alternative TMDL implementation plan that addresses chloride impairment of surface waters and degradation of groundwater. The alternative plan, the AWRM, was first set forth by the Upper Basin water purveyors and United Water Conservation District (UWCD), the management agency for groundwater resources in the Ventura County portions of the Upper Santa Clara River watershed. The AWRM program increases chloride WQOs in certain groundwater basins and reaches of the Upper Santa Clara River watershed, decreases the chloride

objectives in the eastern Piru Basin, and results in an overall reduction in chloride loading as well as water supply benefits.⁴

The AWRM program, which is described in detail in the GSWI Task 2B-2 Report,⁵ consists of advanced treatment for a portion of the recycled water from the Valencia WRP; construction of a well field in the eastern Piru basin to pump out higher chloride groundwater; discharging the blended pumped groundwater and advanced treated recycled water to Reach 4A at the western end of the Piru basin at a chloride concentration not to exceed 95 mg/L; and conveyance of supplemental water and advanced treated recycled water to the Santa Clara River.

A GSWI model was developed to assess the linkage between chloride sources and instream water quality, and to quantify the assimilative capacity of Santa Clara River Reaches 4A, 4B, 5, and 6 and the groundwater basins underlying those reaches.⁶ GSWI was then used to predict the effects of WRP discharges on chloride loading to surface water and groundwater under a variety of future hydrology, land use, and water use assumptions, including future discharges from the Newhall Ranch Specific Plan projects, in order to determine appropriate WLAs and load allocations. The GSWI model was used to assess the ability of the AWRM to achieve compliance with proposed conditional SSOs under future water use scenarios within the Upper Santa Clara River watershed. The model was based on design capacities at Valencia WRP and Saugus WRP of 27.6 million gallons per day (mgd) and 6.5 mgd, for a total system design capacity of 34.1 mgd by year 2027.⁷ The model predicted that the AWRM could achieve proposed conditional SSOs for chloride under both drought and non-drought conditions.⁸

The Santa Clarita Valley Sanitation District is currently discharging wastewater from the Valencia WRP pursuant to Order No. R4-2009-0074 and NPDES Permit No. CA0054216.⁹ The Valencia WRP has a current design capacity of 21.6 mgd and serves an estimated population of 162,661.¹⁰

⁴ Los Angeles Regional Water Quality Control Board (RWQCB), 2008. Upper Santa Clara River Chloride TMDL Reconsideration, Conditional Site Specific Objectives for Chloride, and Interim Wasteload Allocations for Sulfate and Total Dissolved Solids Staff Report. November 24, 2008. This report is incorporated by reference and available for public review upon request to the County.

⁵ Geomatrix, 2008. Draft Task 2b-2 Report - Assessment of Alternatives for Compliance Options Using the Groundwater/Surface Water Interaction Model Upper Santa Clara River Chloride TMDL Collaborative Process. This report is incorporated by reference and available for public review upon request to the County.

⁶ See footnote 9.

⁷ See footnote 9.

⁸ See footnote 10.

⁹ Los Angeles Regional Water Quality Control Board, 2009. Order No. R4-2009-0074 (NPDES No. CA0054216), Waste Discharge Requirements for the Santa Clarita Valley Sanitation District of Los Angeles County, Valencia Water Reclamation Plant Discharge to Santa Clara River. This report is incorporated by reference and available for public review upon request to the County.

The Valencia WRP is part of the Santa Clarita Valley Sanitation District's regional system that also includes the Saugus WRP. The regional system allows biosolids, solids, and excess influent flows from the Saugus WRP to be diverted to the Valencia WRP for treatment and disposal. The Valencia WRP currently receives wastewater from the City of Santa Clarita and unincorporated areas of Los Angeles County. The wastewater is a mixture of pretreated industrial and residential wastewater.

In order to comply with chloride TMDL, the Santa Clarita Valley Sanitation District will likely need to add facilities because existing treatment processes do not provide chloride removal. No decision has been made regarding how the Santa Clarita Valley Sanitation District will achieve compliance with the chloride TMDL; however, the long-term compliance schedule established in RWQCB's revised chloride TMDL Resolution No. R4-2008-12 (December 11, 2008) allows time for attaining compliance.¹¹

Nonetheless, the Santa Clarita Valley Sanitation District Board of Directors recently committed to initiate efforts to complete a Wastewater Facilities Plan and EIR for facilities to comply with a final effluent chloride limit of 100 mg/L and begin design of the facilities. The District also has estimated that it will complete the Wastewater Facilities Plan and EIR by December 31, 2012.¹²

For further responsive information, please see the Mission Village Final EIR (October 2011), **Topical Response 5: Chloride**.

Responses to Comments regarding Efforts to Work with Water and Sanitation District

The Coalition states that efforts have been made to work with the water and sanitation districts in Los Angeles County, as well as other agencies in the Santa Clarita Valley, to address chloride in a reasonable and equitable manner. The County acknowledges those efforts and the comment will be made available to the decision makers prior to a final decision on the proposed project.

Responses to Comments regarding Payment of Infrastructure Expansion Costs

The Coalition states that the Newhall Ranch Specific Plan EIR requires that Newhall pay for "infrastructure expansion" and that chloride releases from the Valencia WRP were not addressed in the

¹⁰ Los Angeles Regional Water Quality Control Board, 2009. Fact Sheet for Order No. R4-2009-0074 (NPDES No. CA0054216), Waste Discharge Requirements for the Santa Clarita Valley Sanitation District of Los Angeles County, Valencia Water Reclamation Plant Discharge to Santa Clara River. This report is incorporated by reference and available for public review upon request to the County.

¹¹ The WLA-based final effluent limit for chloride becomes operative 11 years after the effective date of the Upper Santa Clara River Chloride TMDL (5/4/2016).

¹² The Santa Clarita Valley Sanitation District Board of Directors Notice and Agenda of its Regular Meeting held on July 26, 2011, Item No. 4, reflects the Board's authorization to prepare the Facilities Plan, EIR, and design of such facilities. This Notice/Agenda is incorporated by reference and available for public review and inspection upon request to the County's Department of Regional Planning.

Specific Plan EIR because Newhall's use of the Valencia WRP was never discussed and had it been discussed, there undoubtedly would have been mitigation.

As stated in the Districts' memorandum (see Mission Village Final EIR (May 2011), **Appendix F4.22**), the temporary use of the Valencia WRP for treatment of Landmark Village and Mission Village wastewater does not eliminate the requirement for Newhall Land to both construct the Newhall Ranch WRP and finance the new sewerage system within the Specific Plan area. As stated above, the Interconnection Agreement provides the necessary land and infrastructure for the logical development and implementation of the Newhall Ranch WRP. The Interconnection Agreement was considered and approved by the District 26 and District 32 Boards at their January 9, 2002 meeting.

The Interconnection Agreement sets conditions under which the first 6,000 homes in Newhall Ranch may temporarily discharge wastewater to the Santa Clarita Valley Sanitation District's Valencia WRP. The conditions include payment of the standard connection fee (fair share of the cost of the existing infrastructure) and transfer of title of the 22-acre Newhall Ranch WRP site to the Newhall Ranch Sanitation District. Newhall Ranch residents also would pay the Santa Clarita Valley Sanitation District an annual service charge to recover the full cost of treating their wastewater at the Valencia WRP. Temporary treatment of wastewater at the Valencia WRP would not eliminate the need for the developer to finance and construct the Newhall Ranch WRP. Newhall, as the developer, must still construct the Newhall Ranch WRP. and the new sewerage system for the Specific Plan area.

The Interconnection Agreement specifies that Newhall must fund construction of the Newhall Ranch WRP, which is contemplated to be constructed in stages as the Specific Plan area is developed, and it sets conditions under which the first 6,000 homes in Newhall Ranch (i.e., the Landmark Village and Mission Village projects) may temporarily discharge wastewater to the Valencia WRP.

Temporarily treating wastewater from the first 6,000 Newhall Ranch homes at the Valencia WRP is a practical engineering decision based on the need to build up an adequate, steady flow of wastewater before starting up the Newhall Ranch WRP. The Interconnection Agreement does not impact the Santa Clarita Valley Sanitation District's ability to comply with the chloride TMDL. As discussed above, the Valencia WRP has available capacity for interim treatment of Landmark Village and Mission Village wastewater. The Santa Clarita Valley Sanitation District supports this interim action for these same reasons. (Please refer to the Districts' memorandum, dated March 8, 2011. The memorandum and attachments are found in **Appendix F4.22** of the Mission Village Final EIR (May 2011).)

Responses to Comments regarding Construction of the Newhall Ranch WRP

The Coalition asks that if temporary use of the Valencia WRP for treatment of Landmark Village and Mission Village wastewater is allowed, what “guarantee” is there that the applicant (Newhall Land) “will ever build” the Newhall Ranch WRP? As stated in the Districts' memorandum, and in the Interconnection Agreement, the applicant (Newhall Land) is still required to construct the Newhall Ranch WRP, and the temporary use of the Valencia WRP does not eliminate the requirement for Newhall Land to both construct the Newhall Ranch WRP and finance the new sewerage system with the Specific Plan area. For further responsive information, please see **Topical Response 5: Chloride** and the Districts' memorandum (Mission Village Final EIR, May 2011, **Appendix F4.22**).

Responses to Comments Regarding Construction of the Newhall Ranch WRP or Paying a Share of the Costs of Providing Facilities at the Valencia WRP to Treat the Effluent

The Coalition requests that before any further approval is granted, the applicant should be required to build the Newhall Ranch WRP “as promised in the Specific Plan;” or that it pay “their share of the cost of providing facilities to treat their effluent flow to meet the chloride TMDL as they would have had to do for the Newhall Ranch WRP NPDES permit.”

In response, as stated above, temporary use of the Valencia WRP for treatment of the first 6,000 units of Landmark Village and Mission Village wastewater does not eliminate the requirement for the developer (Newhall Land) to construct the Newhall Ranch WRP per the Specific Plan. Newhall Land must still construct the Newhall Ranch WRP prior to building more than 6,000 homes within Newhall Ranch's Landmark Village and Mission Village. As stated in the Districts' memorandum, the temporary use of the Valencia WRP addresses practical engineering considerations, but does not eliminate the requirement for Newhall Ranch to construct the Newhall Ranch WRP and finance the new sewerage system for Newhall Ranch.

In addition, as stated above, the Mission Village Final EIR makes clear that the project applicant (Newhall) has identified interim chloride reduction treatment at the Valencia WRP, so that interim chloride reduction would be achieved and be equivalent to that of the Newhall Ranch WRP under that NPDES Permit (100 mg/L):

“In addition, and as explained in this response, to confirm full and complete compliance with the chloride TMDL, Newhall has identified interim chloride reduction treatment at the Valencia WRP. This involves chloride treatment of the effluent amount originating from Newhall Ranch (up to 6,000 dwelling units) at the Valencia WRP during the operation period of the 2002 Interconnection Agreement. The result is that the project effluent discharged to the Santa Clara River through the permitted Valencia WRP outfall would result in discharge equivalent to 100 mg/L chloride (or other applicable standard), which is the chloride effluent treatment standard under the Newhall Ranch WRP NPDES

permit (NPDES No. CA0064556, Order No. R4-2007-0046). This additional treatment process would remove chloride from the Newhall Ranch effluent at the Valencia WRP, so that the interim chloride reduction would be equivalent to that of the Newhall Ranch WRP under the Newhall Ranch WRP Permit (100 mg/L)." (Mission Village Final EIR [October 2011], **Topical Response 4: Revised Project Design**, pp. TR-4-25-26.)

Therefore, the applicant has responded to the Coalition's request that the applicant pay its share of the cost of providing facilities at the Valencia WRP as needed to treat its effluent to meet the chloride objective of 100 mg/L.



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

**BOS-2 Letter to Board of Supervisors from Ventura County Board of Supervisors,
Kathy Long, dated October 3, 2011**



BOARD OF SUPERVISORS
COUNTY OF VENTURA
GOVERNMENT CENTER, HALL OF ADMINISTRATION
800 SOUTH VICTORIA AVENUE, VENTURA, CALIFORNIA 93009

October 3, 2011

Mr. Michael D. Antonovich
Supervisor, Fifth District
Los Angeles County Board of Supervisors
500 W. Temple St.
Los Angeles, CA 90012

Re: Re-Circulated DEIR for Landmark Village 1st phase of the Newhall Ranch Project on the Santa Clara River Project No. 00-196 / Tract Map No. 53108 Issues relating to Chloride

Dear Supervisor Antonovich:

I am writing to express my strong support and agreement with the letter sent September 23, 2011 to you and the Board members, from the Ventura County Agricultural Water Quality Coalition. As was stated, the Newhall Ranch Specific Plan Environmental Impact Report was certified by the Los Angeles County Board of Supervisors in 2003. It stated that a new sanitation plant would be built to serve this project. In a subsequent letter dated in 2003 commenting on this issue for the DEIR, the Los Angeles Regional Water Quality Control Board (RWQCB) stated that achieving the Santa Clara River chloride Total Maximum Daily Load (TMDL) would be addressed in the permitting process, by requiring that the Newhall Ranch Sanitation Plant releases to the Santa Clara River meet the chloride TMDL of 100mg/L. The permit required the 100mg/L chloride objective be met, with the intention that this plant, promising to be operated with reverse osmosis, would reduce the overall chloride level in the river.

Now Newhall is instead proposing to run the first two tracts of Newhall Ranch, totaling some 6,000 units through the existing Valencia Sanitation Plant, a scenario that could elevate the chloride load rather than reducing it. Additional environmental documents have also been completed for various permits needed for the Newhall Ranch project, including the formation of a Newhall Ranch Sanitation District and a comprehensive EIR/EIS prepared for the Santa Clara River Alteration permit in this area. All these documents refer to the construction of a sanitation plant that will meet the chloride objective of 100mg/L. Newhall now proposes in this first tract map application for Landmark Village, that the first 6,000 units of housing developed in Newhall Ranch may be serviced by the Valencia Treatment plant instead of meeting their requirement to build a new plant. Such a proposal would seem to severely impede the RWQCB requirement to meet the chloride objective for the Santa Clara River by 2015.

MEMBERS OF THE BOARD
LINDA PARKS
Chair
STEVE BENNETT
KATHY LONG
PETER C. FOY
JOHN C. ZARAGOZA

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The re-circulated DEIR before you does not disclose or address the issue of the additional chloride load caused by this proposal. The Sanitation District merely proposes that recent rains have somehow permanently reduced salt levels in the water for these projects. Such information is not supported by the facts disclosed in the EIR. Nor does the EIR seek to mitigate the amount of chlorides in the Sanitation District releases that will be produced by the Landmark project and the subsequent Mission Village project.

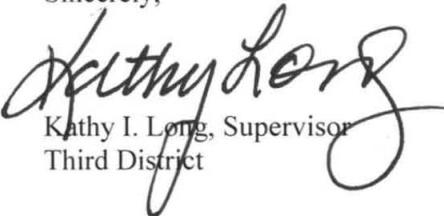
The Coalition further questions a January 18th 2011 Board of Supervisors hearing (agenda item 25), a 2002 contract, made without benefit of CEQA or public disclosure, between Newhall and the Sanitation Districts, referenced for the first time in a staff report. The failure to disclose this contract during the evaluation of the Specific Plan, and thus address its effect on the chloride issue, cast significant concerns with process and transparency.

DEIRs for both Landmark and Mission Village indicated high chloride levels in wells intended for use in these tracts. Such levels would likely not meet the current TMDL for chlorides when household salt loads are added. Although the Sanitation Districts have been aware of this problem since 1979, they have been slow to address the issue, while the use of imported water and rising salt levels continued in the ensuing decades. The downstream farming community has made every effort to work with the water and sanitation districts, as well as other agencies in the Santa Clarita Valley, to address this matter in a reasonable and equitable manner while still protecting crop production.

The Newhall Ranch Specific Plan clearly stated that Newhall was to pay for infrastructure expansion. Chloride releases from the sanitation plant were not addressed in the Specific Plan because Newhall's use of the Valencia Treatment plant was never discussed. Had it been, your Board would have undoubtedly required mitigation to address this issue. If Newhall Ranch is allowed to use the Valencia treatment plant, what guarantee is there that it will ever build the Newhall Ranch Sanitation Plant?

I request that this issue be addressed before any further approval is granted, either by: (1) requiring that Newhall build the Newhall Ranch Sanitation Plant as promised in the Specific Plan, or (2) Newhall pay its share of the cost of providing facilities at the Valencia Treatment plant to treat its effluent flow to meet the chloride objective of 100mg/L as it would have had to do for the Newhall Ranch Sanitation permit. Your consideration of this request would be appreciated.

Sincerely,



Kathy I. Long, Supervisor
Third District

Cc: Executive Office, Los Angeles County Board of Supervisors, for the Administrative Record
Supervisor Zev Yaroslavsky
Supervisor Don Knabe
Supervisor Gloria Molina
Supervisor Mark Ridley-Thomas
Sam Dea, Planner, Special Projects Los Angeles County
Debra Smith, Regional Water Quality Control Board

Introduction

By letter dated October 3, 2011, Supervisor Kathy I. Long, Third District, County of Ventura, submitted a letter addressing the Landmark Village Recirculated Draft EIR to the Los Angeles County Board of Supervisors expressing support and agreement with the letter from the Ventura County Agricultural Water Quality Coalition, dated September 23, 2011 (**BOS-1**). County staff reviewed Supervisor Long's comments and prepared written responses that were provided to the Board in advance of the public hearing held October 4, 2011 to consider the Landmark Village project.

Although Supervisor Long's comments were not submitted in connection with the County's review of the Mission Village project, the letter refers to Mission Village and the Draft EIR. Accordingly, while the Coalition's comments were submitted as part of the Landmark Village project, County staff has prepared the following responses for the Board's information.

Preliminarily, staff notes that at the end of Supervisor Long's letter, the Supervisor requests that before any further approval is granted, Newhall should *either* be required to build the Newhall Ranch Water Reclamation Plant (WRP), or the applicant should "pay its share of the costs of providing facilities" at the Valencia WRP "to treat its effluent flow to meet the chloride objective of 100 mg/L" as it would have to do for the Newhall Ranch WRP's NPDES permit.

As explained below, the County already has required the applicant to pay its share of the costs of providing facilities at the Valencia WRP as needed to treat its effluent to meet the chloride objective of 100 mg/L. Therefore, Ventura County's request has been satisfied.

**Responses to Comments Regarding Construction of the Newhall Ranch WRP or
Paying a Share of the Costs of Providing Facilities at the Valencia WRP to Treat the Effluent**

As stated above, Ventura County requests that before any further approval is granted, the applicant should *either* be required to build the Newhall Ranch WRP "as promised in the Specific Plan," *or* that it pay "its share of the cost of providing facilities at the Valencia Treatment Plant to treat its effluent flow to meet the chloride objective of 100 mg/L as it would have had to do for the Newhall Ranch Sanitation permit." (Supervisor Long letter, page 2, last paragraph.)

Temporary use of the Valencia WRP for treatment of the first 6,000 units of Landmark Village and Mission Village wastewater does not eliminate the requirement for the developer (Newhall Land) to construct the Newhall Ranch WRP per the Specific Plan. Newhall Land must still construct the Newhall Ranch WRP prior to building more than 6,000 homes within Newhall Ranch's Landmark Village and

Mission Village. As stated in the Districts' memorandum, the temporary use of the Valencia WRP addresses practical engineering considerations, but does not eliminate the requirement for Newhall Ranch to construct the Newhall Ranch WRP and finance the new sewerage system for Newhall Ranch.

In addition, the Mission Village Final EIR makes clear that the project applicant (Newhall) has identified interim chloride reduction treatment at the Valencia WRP, so that interim chloride reduction would be achieved and be equivalent to that of the Newhall Ranch WRP under that National Pollutant Discharge Elimination System (NPDES) Permit (100 mg/L):

“In addition, and as explained in detail in this response, to confirm full and complete compliance with the chloride TMDL, Newhall has identified interim chloride reduction treatment at the Valencia WRP. This involves chloride treatment of the effluent amount originating from Newhall Ranch (up to 6,000 dwelling units) at the Valencia WRP during the operation period of the 2002 Interconnection Agreement. The result is that the project effluent discharged to the Santa Clara River through the permitted Valencia WRP outfall would result in discharge equivalent to 100 mg/L chloride (or other applicable standard), which is the chloride effluent treatment standard under the Newhall Ranch WRP NPDES permit (NPDES No. CA0064556, Order No. R4-2007-0046). This additional treatment process would remove chloride from the Newhall Ranch effluent at the Valencia WRP, so that the interim chloride reduction would be equivalent to that of the Newhall Ranch WRP under the Newhall Ranch WRP Permit (100 mg/L).” (Mission Village Final EIR [October 2011], **Topical Response 4: Revised Project Design**, pp. TR-4-25-26.) (Note that Topical Responses from the Final EIR referenced in this response are presented in a separate section entitled “Referenced Topical Responses from the Mission Village Final EIR, October 2011.”)

Therefore, Ventura County’s request that the applicant pay its share of the cost of providing facilities at the Valencia WRP as needed to treat its effluent to meet the chloride objective of 100 mg/L has been met.

The balance of Ventura County's comments are addressed below.

Response to Comments regarding Interim Use of Valencia Water Reclamation Plant

The Ventura County comment letter, page 1, refers to the Los Angeles County Board of Supervisors’ certification of the Newhall Ranch environmental documentation on May 27, 2003, and the Newhall Ranch WRP to be built to serve the Specific Plan. The comment also refers to the Regional Water Quality Control Board “permit.” The comment claims that the temporary discharge of Newhall Ranch wastewater to the existing Valencia WRP from the first 6,000 homes in Newhall Ranch’s Mission Village and Landmark Village would “elevate the chloride load rather than reducing it.”

First, Ventura County’s reference to the “permit” likely is referring to the Newhall Ranch WRP NPDES Permit No. CA0064556, which established effluent limitations and discharge specifications for the

Newhall Ranch WRP, and the chloride effluent limitation in that permit is 100 mg/L. (Please also refer to the Mission Village Final EIR (October 2011), Volume VIII, **Topical Response 5: Chloride** for additional responsive information.)

Second, the County does not concur with Ventura County's statement that the applicant's interim use of the existing Valencia WRP to treat Newhall Ranch wastewater from the first 6,000 homes in Newhall Ranch's Mission Village and Landmark Village would "elevate" the chloride load into the Santa Clara River. As to this statement, Ventura County has not provided specific documentation to support the comment as required by the California Environmental Quality Act (CEQA) (see Cal. Code Regs. tit. 14, §21153, subd. (c)). In addition, Ventura County's statement is not consistent with the information presented in the Sanitation Districts of Los Angeles County's technical memorandum, dated March 8, 2011, which was included in the Mission Village Final EIR (May 2011), **Appendix F4.22** (Districts' memorandum). The Districts' memorandum shows that discharge of Newhall Ranch wastewater to the Valencia WRP from the first 6,000 homes in Newhall Ranch's Mission Village and Landmark Village would be temporary until construction of the Newhall Ranch WRP. Temporary treatment of wastewater at the Valencia WRP also would not eliminate the need for the developer (Newhall Land) to construct the Newhall Ranch WRP; and prior to building more than 6,000 homes, Newhall Land must construct the new plant. The temporary use of the Valencia WRP addresses practical engineering considerations such as the need to build-up an adequate and steady flow of wastewater before start-up of the Newhall Ranch WRP. The chloride concentrations of the Newhall Ranch and the Santa Clarita Valley Sanitation District, or SCVSD, wastewater are expected to be similar; thus, temporary treatment of Newhall Ranch wastewater at the Valencia WRP would not change the SCVSD's ability to comply with the chloride Total Maximum Daily Load (TMDL). As stated by the Districts in its March 8, 2011 memorandum:

"As noted in the Item 1 and 4 responses, temporary treatment of Landmark Village and Mission Village wastewater at the VWRP would not eliminate the need for the developer to construct the NRWRP and to finance the new sewerage system, nor would it impact compliance with the Chloride TMDL. As presented in the Item 2 response, the VWRP has available capacity for temporary treatment of Landmark Village and Mission Village wastewater. Thus, no negative impact to the SDVSD's sewerage system is expected, and this approach does not conflict with the Specific Plan's requirement for construction of the NRWRP." (Mission Village Final EIR (May 2011), **Appendix F4.22** [Districts' memorandum, dated March 8, 2011, p. 5].)

In addition, based on the Districts' memorandum, the Districts have advised the County that the discharge of Newhall Ranch wastewater to the Valencia WRP would produce *similar* increases in chloride concentrations when compared to existing Santa Clarita Valley communities; therefore, there would be no negative impact to the SCVSD's sewerage system or its ability to comply with the chloride TMDL:

“When operating at flows equal to or below the permitted plant capacity, compliance with the Chloride TMDL will depend on the chloride concentration in the treatment plant effluent. This concentration results from two primary sources: chloride concentration of the local water supply, and increased chloride concentration due to use of the water by the community. Local groundwater is the planned potable water source for the Specific Plan's Landmark and Mission Villages, the two developments whose wastewater might be temporarily treated at the VWRP under the Interconnection Agreement. The groundwater chloride levels for those communities are similar to that of the groundwater used by existing Santa Clarita Valley communities. Thus, no difference in chloride concentration is expected due to the water supply.

Like Santa Clarita, Newhall Ranch will be a mixture of residential, commercial and industrial land uses. Use of automatic water softeners (AWS) was a significant chloride source for SCVSD wastewater prior to the 2008 ban on AWS. Per Specific Plan mitigation measure 5.0-52(b), the Newhall Ranch developer must request that [the Newhall Ranch Sanitation District (NRSD)] ban AWS in Newhall Ranch. Districts' staff will also recommend that NRSD enact an AWS ban similar to the ban in the SCVSD. Consequently, the two communities are expected to produce similar increases in chloride concentrations due to use and similar overall wastewater chloride concentrations. Since final compliance will be determined by concentration, the addition of Newhall Ranch wastewater to the VWRP would neither add to nor alleviate the SCVSD's financial burden to comply with the Chloride TMDL.” (See Mission Village Final EIR (May 2011), **Appendix F4.22** [Districts' memorandum, dated March 8, 2011, p. 2].)

The Mission Village Final EIR, **Section 4.22, Water Quality**, and the associated Water Quality Technical Report (2011), prepared by Geosyntec Consultants, also provide technical analyses and support for the Districts' determination. In addition, responsive information is provided in the Mission Village Final EIR (October 2011), Volume VIII, **Topical Response 4: Revised Project Design; Topical Response 5: Chloride**; and Final EIR (May 2011), Volume I, **Topical Response 6: Water Quality**. The County elects to rely on this body of evidence in lieu of Ventura County's statements.

Response to Comments regarding Claims that Interim Use of the Valencia WRP would Impede the Chloride TMDL Requirements

In the comment letter, page 1, last paragraph, and page 2, first paragraph, Ventura County states that several additional environmental documents have been completed for various permits needed for Newhall Ranch, including formation of the Newhall Ranch Sanitation District and the EIS/EIR for the Newhall Ranch Resource Management and Development Plan and the Spineflower Conservation Plan (RMDP/SCP), and that these documents refer to construction of the Newhall Ranch WRP that will meet the chloride TMDL. The comment states that the applicant (Newhall Land) now proposes to discharge Newhall Ranch wastewater (first 6,000 homes from Mission Village and Landmark Village) to the Valencia WRP “instead of meeting their requirement to build a new plant.” The comment states that such

a proposal would seem to “severely impede the RWQCB requirement to meet the chloride objective for the Santa Clara River by 2015.”

First, the referenced process leading to the County’s formation of the new sanitation district (Newhall Ranch Sanitation District) disclosed the temporary use of the existing Valencia WRP in the Department of Public Works’ staff report to the Board of Supervisors, dated December 1, 2005, pp. 3-4; and the same Department’s staff report to the Board, dated January 18, 2011, p. 3, both of which are incorporated by reference and available for public review and inspection upon request to the County Department of Regional Planning.

Second, as stated above, temporary use of the Valencia WRP for treatment of the Mission Village and Landmark Village wastewater (up to 6,000 homes) does not eliminate the Specific Plan requirement for the developer (Newhall Land) to both construct the Newhall Ranch WRP and finance the new sewerage system for the Specific Plan area. For further information responsive to this comment, please refer to Mission Village Final EIR (October 2011), Volume VIII, **Topical Response 5: Chloride**, and the Districts’ memorandum dated March 8, 2011 (see Mission Village Final EIR (May 2011), **Appendix F4.22**).

Third, the Mission Village Final EIR (October 2011) already addressed the broader issues of compliance with the chloride TMDL; please see **Topical Response 5: Chloride**. The Mission Village Final EIR, **Topical Response 4: Revised Project Design**, also evaluated the interim use of the Valencia WRP, taking into account overall environmental and cost considerations. The topical response: (a) provided background information regarding the chloride TMDL governing the Upper Santa Clara River; (b) summarized the Santa Clarita Valley Sanitation District’s WRP permitting and operations; (c) assessed Newhall Ranch’s interim use of the existing Valencia WRP; (d) summarized existing chloride concentrations at the Valencia WRP; (e) addressed cost implications for the temporary discharges to the Valencia WRP; and (f) provided a summary of Santa Clarita Valley Sanitation District’s response to the administrative Notices of Violation it received from the Regional Water Quality Control Board, Los Angeles Region. The topical response also evaluated the potential significant environmental impacts associated with the interim chloride reduction facilities that would further treat the wastewater from Landmark Village and Mission Village, if needed, until such time as the first phase of the Newhall Ranch WRP is constructed. Based on that information, the County has determined that the interim use of the Valencia WRP, as proposed, would not impede the Santa Clarita Valley Sanitation District’s ability to meet the chloride TMDL requirements.

Responses to Comment regarding Ventura County's Position

Ventura County states that the Landmark Village Final EIR "does not disclose or address the issue of the additional chloride load caused by its proposal," and states that the Santa Clarita Valley Sanitation District has not satisfactorily responded to the chloride issues presented. County staff will address the comment in the context of the Mission Village Final EIR.

First, the County is not proposing to "change" the ultimate treatment of wastewater from the Newhall Ranch Specific Plan. As stated above, the applicant (Newhall Land), in coordination with the Santa Clarita Valley Sanitation District, has proposed the temporary use of the Valencia WRP for treatment of Newhall Ranch wastewater (i.e., the first 6,000 homes in Landmark Village and Mission Village), and this temporary usage does not eliminate the Specific Plan requirement for Newhall Land to construct the Newhall Ranch WRP and finance the new sewerage system for the Specific Plan area. As stated, the temporary use of the Valencia WRP addresses practical engineering considerations, and is *not* a change that eliminates construction of the Newhall Ranch WRP. For further responsive information, please see the Mission Village Final EIR (October 2011), **Topical Response 5: Chloride**, and the Districts' memorandum dated March 8, 2011 (see Mission Village Final EIR (May 2011), **Appendix F4.22**).

In addition, the Mission Village project's interim wastewater treatment and capacity were addressed in the Mission Village Final EIR (May 2011), **Section 4.9, Wastewater Disposal**. Beginning on page 4.9-11, the Final EIR states:

"As previously discussed, the long-range plan is for the Newhall Ranch WRP to be constructed exclusively to serve uses within Newhall Ranch. The new WRP's capacity would be 6.8 mgd, with a maximum flow of 13.8 mgd. A new County sanitation district has been formed and is known as the Newhall Ranch County Sanitation District or NRCSD. Project generated wastewater, 0.695884 mgd, would be treated by the NRCSD at the Newhall Ranch WRP, although interim treatment at the Valencia WRP would occur under some of the wastewater treatment scenarios as described below. Project generated wastewater of approximately 0.26641 mgd would be treated at the Valencia WRP permanently. As the planned treatment capacity of the Newhall Ranch WRP would be sufficient to treat wastewater flows from the entire Specific Plan project, no significant long-term operational impacts would result from the treatment of wastewater generated by the Mission Village project.

~~However, u~~Until the Newhall Ranch WRP construction is completed and the plant is operational, on an interim basis, three wastewater disposal options are available to treat the majority of the wastewater generated by the proposed project. One scenario, as shown in **Figure 1.0-32, Mission Village Wastewater System – Scenario 1**, provides for the construction of an initial phase of the Newhall Ranch WRP to serve the Mission Village ~~subdivision project~~. Under this scenario, buildout of the WRP would occur over time as demand for treatment increases due to subsequent development of the Newhall Ranch Specific Plan. The second scenario, as shown in **Figure 1.0-33, Mission Village**

Wastewater System – Scenario 2, provides for an option should the Newhall Ranch WRP not yet be constructed. In this scenario, flows would be piped across the Commerce Center Drive Bridge to an interim pump station north of the Santa Clara River along the utility corridor where wastewater would be pumped back to an existing CSDLAC pump station, then to the existing Valencia WRP, located upstream of the project site along I-5. The pump station would be used until such time as the first phase of the Newhall Ranch WRP is constructed- and operational. The third scenario, as shown in **Figure 1.0-34, Mission Village Wastewater System – Scenario 3**, is an interim option that would be implemented in the event that the Commerce Center Drive Bridge is not constructed prior to the occupancy of new land uses on the Mission Village project site. Under this scenario, an interim pump station would be constructed near the intersection of “GG” Street and Commerce Center Drive that would pump effluent to the existing Valencia WRP, which is located approximately 0.5 mile east of the project site along I-5. Under this scenario, a force main from the interim pump station on the project site to the proposed sewer mainline in Magic Mountain Parkway would be constructed. This proposed sewer mainline would connect with an existing line at the intersection of The Old Road and Magic Mountain Parkway. As with Scenario 2 described above, wastewater from the Mission Village project would continue to be pumped temporarily to the Valencia WRP until such time as the first phase of the Newhall Ranch WRP is constructed and operational, consistent with the Interconnection Agreement. The available capacity under each of these three treatment scenarios is discussed below.

(a) Treatment Scenario 1

Project generated wastewater requiring treatment has been calculated at approximately ~~1.130~~0.96 mgd. At buildout, the treatment capacity of the Newhall Ranch WRP would be 6.8 mgd, with a maximum flow of 13.8 mgd. The Newhall Ranch WRP has been designed to serve the buildout of the Newhall Ranch Specific Plan area, of which Mission Village is a part. Under this treatment scenario, the first phase of the WRP would be sufficiently sized to accommodate wastewater from the Mission Village project. The WRP was conditioned by the Board of Supervisors to be designed and constructed to the standards of CSDLAC and state standards and requirements. In addition, the Valencia WRP would be able to accommodate the approximately 0.266 mgd of wastewater from the project that will permanently be treated at this facility. As a result, no significant operational impacts would occur under this scenario.

(b) Treatment Scenario 2

Under this scenario, an interim pump station would be constructed along the utility corridor to pump wastewater via pipeline to the Valencia WRP. As a result of CSDLAC future wastewater generation estimates, CSDLAC proposed a two-phase plan to expand the SCVSD treatment facilities, which include the Valencia WRP, to meet anticipated future wastewater disposal needs of 34.12 mgd.¹ The most recent phase was completed

¹ Ibid. [To the extent required, the SCVSD may utilize the Mission Village EIR or the Landmark Village EIR, as necessary, if one of the above Valencia WRP sewer options is selected an one or both of the project EIRs are certified by the County's Board of Supervisors.]

in May 2005 and expanded treatment capacity by approximately 9 mgd, or approximately 47 percent, to the current total treatment capacity of approximately 28.1 mgd. Based on population projections ~~published in from the SCAG 2004 Regional Transportation Plan, 2008, the previously approved Stage VI expansion of the Valencia WRP is not expected to be needed until approximately 2021 and the site build-out capacity of 34.2 mgd is not expected to be reached until 2033.~~² ~~has adequate capacity through the year 2015. Another phase (Stage VI) expansion would increase capacity by 6 mgd, but will not be constructed until flow materializes.~~³ According to recent SCVSD flow projections based on the SCAG 2008 Regional Transportation Plan, the previously approved Stage VI expansion at the Valencia WRP is not expected to be needed until approximately 2021 and the site buildout capacity of 34.2 mgd is not expected to be reached until approximately 2033. Consequently, the planned short-term use of the Valencia WRP to treat ~~1.130.96~~ 0.96 mgd of the project's wastewater is expected to have no impact on future expansion of the SCVSD facilities. In addition, the Valencia WRP would be able to accommodate the approximately 0.266 mgd of wastewater from the project that will permanently be treated at this facility.

Additionally, as stated earlier, numerous safeguards exist within the County's project approval process to ensure available treatment capacity, including, as noted above, that connection permits for new development are not issued if there is not sufficient capacity. Moreover, mitigation adopted by the County as part of its approval of the Specific Plan provides that prior to recordation of each subdivision permitting construction; the applicant is required to obtain a letter from the new County sanitation district stating that treatment capacity will be adequate for that subdivision (Mitigation Measure SP 4.12-4). As a result, no significant operational impacts would occur under this scenario.

(c) Treatment Scenario 3

Similar to Scenario 2, under this scenario wastewater from the Mission Village project would be conveyed to SCVSD and, as discussed immediately above, the planned short-term use of the Valencia WRP to treat the project's wastewater can be accommodated, as well as the permanent treatment of approximately 0.266 mgd of project wastewater. For this reason, no significant operational impacts would occur under this scenario." ⁴ (Mission Village Final EIR (May 2011), Volume II, **Section 4.9, Wastewater Disposal**, pp. 4.9-11-14; see also Final EIR, Section 1.0, Project Description, pp. 1.0-69-70a.)

In addition, the Santa Clarita Valley Sanitation District has responded fully to chloride claims advanced concerning interim use of its Valencia WRP. Please see the Mission Village Final EIR (May 2011), **Appendix F4.22** (Districts' memorandum, dated March 8, 2011). For further responsive information,

² CSDLAC comment letter to Carolina Blengini, Los Angeles County Department of Regional Planning, dated November 17, 2010.

⁴ The above double-underline and strike-out text reflects the changes that were made between the Draft and Final EIR, in response to comments.

please refer to the Mission Village Final EIR (October 2011), **Topical Response 4: Revised Project Design**; and **Topical Response 5: Chloride**.

Responses to Comments regarding the Mitigation of Chlorides

Ventura County states that the Landmark Village EIR does not “seek to mitigate the amount of chlorides in the sanitation district releases that will be produced by the Landmark project and the subsequent Mission Village project.” County staff will address the comment in the context of the Mission Village Final EIR. The County does not concur with this statement.

The Mission Village Final EIR (October 2011), **Topical Response 4: Revised Project Design**, thoroughly addresses the various issues associated with interim use of the Valencia WRP. The Final EIR makes clear that the project applicant (Newhall) has identified interim chloride reduction treatment at the Valencia WRP, so that interim chloride reduction would be achieved and be equivalent to that of the Newhall Ranch WRP under that NPDES Permit (100 mg/L):

“In addition, and as explained in this response, to confirm full and complete compliance with the chloride TMDL, Newhall has identified interim chloride reduction treatment at the Valencia WRP. This involves chloride treatment of the effluent amount originating from Newhall Ranch (up to 6,000 dwelling units) at the Valencia WRP during the operation period of the 2002 Interconnection Agreement. The result is that the project effluent discharged to the Santa Clara River through the permitted Valencia WRP outfall would result in discharge equivalent to 100 mg/L chloride (or other applicable standard), which is the chloride effluent treatment standard under the Newhall Ranch WRP NPDES permit (NPDES No. CA0064556, Order No. R4-2007-0046). This additional treatment process would remove chloride from the Newhall Ranch effluent at the Valencia WRP, so that the interim chloride reduction would be equivalent to that of the Newhall Ranch WRP under the Newhall Ranch WRP Permit (100 mg/L).” (Mission Village Final EIR [October 2011], **Topical Response 4: Revised Project Design**, pp. TR-4-25-26.)

Responses to Comments regarding Disclosure of Interim Wastewater Treatment

Ventura County states that the applicant (Newhall Land) has failed to disclose the 2002 Interconnection Agreement “during the evaluation of the Specific Plan, and thus address its effect on the chloride issue.” Ventura County also states that this has “cast significant concerns with process and transparency.” The County does not concur with these comments.

The formation of a new sanitation district was identified in the previously-certified Newhall Ranch Specific Plan environmental documentation as a mitigation measure, and the Interconnection Agreement was developed to establish a logical plan for the development and administration of the new sanitation district and its infrastructure. As explained below, the Interconnection Agreement was not hidden from view.

To the contrary, on January 9, 2002, at its regular meeting, the Districts' Board considered and approved entering into the Interconnection Agreement. In accordance with the Brown Act, the Districts gave notice and posted the Board agenda, which also was available online, prior to the January 9 meeting. The meeting was open to the public. The Districts' records show no one opposed the Districts' authorization of the Interconnection Agreement. If there was any objection to the Districts entering into the Interconnection Agreement at that time, the objection should have been lodged prior to or at the time of the meeting.

Further, the Interconnection Agreement was referenced in previous County staff reports supporting formation of the new Newhall Ranch Sanitation District (see, for example, Department of Public Works staff report to the Board of Supervisors, dated December 1, 2005, pp. 3-4; and the Department's staff report to the Board dated January 18, 2011, p. 3, both of which are incorporated by reference).

Based on the above, the Interconnection Agreement was evaluated publicly and no information was hidden from the public or the decision makers.

For further responsive information, please see the Mission Village Final EIR (October 2011), **Section 1.0, Project Description**, pp. 1.0-69-70a; **Topical Response 4: Revised Project Design; Topical Response 5: Chloride**; and see Mission Village Final EIR (May 2011), **Appendix F4.22** (Districts' memorandum dated March 8, 2011, and Interconnection Agreement).

Responses to Comments regarding Chloride Levels and Chloride TMDL

Ventura County states that the Draft EIRs “for both Landmark and Mission Villages indicated high chloride levels in wells intended for use in these tracts” and that such levels “would likely not meet the current TMDL for chlorides when household salt loads are added.”

As to the statement that chloride levels in local groundwater wells intended for use in serving the Landmark and Mission Villages indicate “high chloride levels,” the Mission Village Final EIR indicates that such a statement is not correct. Chloride concentration is the main parameter in assessing compliance with the chloride TMDL and results from two inputs: chloride concentration of the water supply and increased chloride concentration due to the community. Local groundwater is the planned potable water source for the Specific Plan’s Landmark and Mission Villages, the two developments whose wastewater is allowed to be temporarily treated at the Valencia WRP under the Interconnection Agreement. The quality of groundwater near the Mission Village site is addressed in the Draft EIR, **Section 4.8, Water Service**. As stated in the Draft EIR, at page 4.8-62:

“(5) Groundwater Quality Near the Mission Village Site

The quality of the groundwater available from the Alluvial aquifer near the Mission Village project site has been tested. Results from laboratory testing conducted for Valencia Water Company wells expected to serve the Mission Village project site or very near the Mission Village site are provided in Draft EIR **Appendix 4.8**. The tested well[s] are approved by DPH and are located north of the Mission Village site in the Valencia Commerce Center. Laboratory testing conducted in July 2009 indicates that all constituents tested were at acceptable levels for drinking water under Title 22. **This Draft EIR also** includes a summary of water quality compliance monitoring results for Valencia Commerce Center Well E-15 from 2006 to 2009. This information indicates that water in this well complies with all federal and state drinking water regulations (see Appendix 4.8 for 2009 laboratory test water well results). Tests conducted for perchlorate indicated non-detect. *The Santa Clarita Valley 2010 Water Quality Report* also shows that water supplies provided by the Valencia Water Company, including water from the Commerce Center wells, meet Title 22 standards for drinking water.” (*Id.*)

The data also shows that the groundwater chloride levels from existing groundwater wells are well within the effluent limitation standards for chloride, and are similar to the groundwater chloride levels in the Santa Clarita Valley, as reported on page 3 of the “Santa Clarita Valley 2010 Water Quality Report,” which is incorporated by reference and available for public review and inspection upon request to the County’s Department of Regional Planning.

For further information responsive to this comment, please see Mission Village Final EIR (October 2011), **Topical Response 5: Chloride**. Los Angeles County appreciates your comments and they will be made available to the decision makers prior to a final decision on the proposed project.

Responses to Comments regarding Santa Clarita Valley Sanitation District Response to Chloride Issues

Ventura County states that the Santa Clarita Valley Sanitation District has been aware of the chloride “problem since 1979,” but it has been “slow to address the issue, while the use of imported water and rising salt levels continued in the ensuing decades.”

The County believes that the Santa Clarita Valley Sanitation District has been responsive to the subject of chloride. For responsive information, please refer to the Mission Village Final EIR (October 2011), **Topical Response 4: Revised Project Design**, pp. TR-4-15 - TR-4-26; and **Topical Response 5: Chloride**, pp. TR-5-3 - TR-5-19.

As background, the RWQCB has developed and adopted an amended chloride TMDL. The chloride TMDL is part of the Basin Plan.

The RWQCB first adopted a TMDL for chloride in the Upper Santa Clara River in October 2002 (Resolution No. 2002-018). On May 6, 2004, the RWQCB amended the Upper Santa Clara River chloride TMDL to revise the interim wasteload allocations (WLAs) and implementation schedule (Resolution 04-004). The amended TMDL was approved by the State Water Resources Control Board (SWRCB), Office of Administrative Law, and the USEPA, and became effective on May 4, 2005. The chloride TMDL requires that chloride levels in WRP effluent not exceed 100 mg/L.

At the time the TMDL was adopted and approved, there were key scientific uncertainties regarding the sensitivity of crops to chloride and the complex interactions between surface water and groundwater in the Upper Santa Clara River watershed. The TMDL recognized the possibility of revised chloride water quality objectives (WQO) and included mandatory reconsiderations by the RWQCB to consider Site Specific Objectives (SSO). The TMDL required the County Sanitation Districts to implement special studies and actions to reduce chloride loadings from the Saugus and Valencia WRPs. The TMDL included the following special studies to be considered by the RWQCB:

- Literature Review and Evaluation (LRE) -- review agronomic literature to determine a chloride threshold for salt sensitive crops.
- Extended Study Alternatives (ESA) -- identify agricultural studies, including schedules and costs, to refine the chloride threshold.
- Endangered Species Protection (ESP) -- review available literature to determine chloride sensitivities of endangered species in the Upper Santa Clara River.
- Groundwater and Surface Water Interaction Study (GSWI) -- determine chloride transport and fate from surface waters to groundwater basins underlying the Upper Santa Clara River.
- Conceptual Compliance Measures -- identify potential chloride control measures and costs based on different hypothetical WQO and final WLA scenarios.
- Site Specific Objectives and Antidegradation Analysis -- consider a site-specific objective for chloride based on the results of the agricultural chloride threshold study and the GSWI.

The TMDL special studies were conducted in a facilitated process in which stakeholders participated in scoping and reviewing the studies. This process resulted in an alternative TMDL implementation plan that addresses chloride impairment of surface waters and degradation of groundwater. The alternative plan, the AWRM, was first set forth by the Upper Basin water purveyors and United Water Conservation District (UWCD), the management agency for groundwater resources in the Ventura County portions of the Upper Santa Clara River watershed. The AWRM program increases chloride WQOs in certain groundwater basins and reaches of the Upper Santa Clara River watershed, decreases the chloride

objectives in the eastern Piru Basin, and results in an overall reduction in chloride loading as well as water supply benefits.⁵

The AWRM program, which is described in detail in the GSWI Task 2B-2 Report,⁶ consists of advanced treatment for a portion of the recycled water from the Valencia WRP; construction of a well field in the eastern Piru basin to pump out higher chloride groundwater; discharging the blended pumped groundwater and advanced treated recycled water to Reach 4A at the western end of the Piru basin at a chloride concentration not to exceed 95 mg/L; and conveyance of supplemental water and advanced treated recycled water to the Santa Clara River.

A GSWI model was developed to assess the linkage between chloride sources and instream water quality, and to quantify the assimilative capacity of Santa Clara River Reaches 4A, 4B, 5, and 6 and the groundwater basins underlying those reaches.⁷ GSWI was then used to predict the effects of WRP discharges on chloride loading to surface water and groundwater under a variety of future hydrology, land use, and water use assumptions, including future discharges from the Newhall Ranch Specific Plan projects, in order to determine appropriate WLAs and load allocations. The GSWI model was used to assess the ability of the AWRM to achieve compliance with proposed conditional SSOs under future water use scenarios within the Upper Santa Clara River watershed. The model was based on design capacities at Valencia WRP and Saugus WRP of 27.6 million gallons per day (mgd) and 6.5 mgd, for a total system design capacity of 34.1 mgd by year 2027.⁸ The model predicted that the AWRM could achieve proposed conditional SSOs for chloride under both drought and non-drought conditions.⁹

⁵ Los Angeles Regional Water Quality Control Board (RWQCB), 2008. Upper Santa Clara River Chloride TMDL Reconsideration, Conditional Site Specific Objectives for Chloride, and Interim Wasteload Allocations for Sulfate and Total Dissolved Solids Staff Report. November 24, 2008. This report is incorporated by reference and available for public review upon request to the County.

⁶ Geomatrix, 2008. Draft Task 2b-2 Report - Assessment of Alternatives for Compliance Options Using the Groundwater/Surface Water Interaction Model Upper Santa Clara River Chloride TMDL Collaborative Process. This report is incorporated by reference and available for public review upon request to the County.

⁷ See footnote 9.

⁸ See footnote 9.

⁹ See footnote 10.

The Santa Clarita Valley Sanitation District is currently discharging wastewater from the Valencia WRP pursuant to Order No. R4-2009-0074 and NPDES Permit No. CA0054216.¹⁰ The Valencia WRP has a current design capacity of 21.6 mgd and serves an estimated population of 162,661.¹¹

The Valencia WRP is part of the Santa Clarita Valley Sanitation District's regional system that also includes the Saugus WRP. The regional system allows biosolids, solids, and excess influent flows from the Saugus WRP to be diverted to the Valencia WRP for treatment and disposal. The Valencia WRP currently receives wastewater from the City of Santa Clarita and unincorporated areas of Los Angeles County. The wastewater is a mixture of pretreated industrial and residential wastewater.

In order to comply with chloride TMDL, the Santa Clarita Valley Sanitation District will likely need to add facilities because existing treatment processes do not provide chloride removal. No decision has been made regarding how the Santa Clarita Valley Sanitation District will achieve compliance with the chloride TMDL; however, the long-term compliance schedule established in RWQCB's revised chloride TMDL Resolution No. R4-2008-12 (December 11, 2008) allows time for attaining compliance.¹²

Nonetheless, the Santa Clarita Valley Sanitation District Board of Directors recently committed to initiate efforts to complete a Wastewater Facilities Plan and EIR for facilities to comply with a final effluent chloride limit of 100 mg/L and begin design of the facilities. The District also has estimated that it will complete the Wastewater Facilities Plan and EIR by December 31, 2012.¹³

For further responsive information, please see the Mission Village Final EIR (October 2011), **Topical Response 5: Chloride**.

¹⁰ Los Angeles Regional Water Quality Control Board, 2009. Order No. R4-2009-0074 (NPDES No. CA0054216), Waste Discharge Requirements for the Santa Clarita Valley Sanitation District of Los Angeles County, Valencia Water Reclamation Plant Discharge to Santa Clara River. This report is incorporated by reference and available for public review upon request to the County.

¹¹ Los Angeles Regional Water Quality Control Board, 2009. Fact Sheet for Order No. R4-2009-0074 (NPDES No. CA0054216), Waste Discharge Requirements for the Santa Clarita Valley Sanitation District of Los Angeles County, Valencia Water Reclamation Plant Discharge to Santa Clara River. This report is incorporated by reference and available for public review upon request to the County.

¹² The WLA-based final effluent limit for chloride becomes operative 11 years after the effective date of the Upper Santa Clara River Chloride TMDL (5/4/2016).

¹³ The Santa Clarita Valley Sanitation District Board of Directors Notice and Agenda of its Regular Meeting held on July 26, 2011, Item No. 4, reflects the Board's authorization to prepare the Facilities Plan, EIR, and design of such facilities. This Notice/Agenda is incorporated by reference and available for public review and inspection upon request to the County's Department of Regional Planning.

Responses to Comments regarding Payment of Infrastructure Expansion Costs

Ventura County states that the Newhall Ranch Specific Plan EIR requires that Newhall pay for “infrastructure expansion” and that chloride releases from the Valencia WRP were not addressed in the Specific Plan EIR because Newhall's use of the Valencia WRP was never discussed and had it been discussed, there undoubtedly would have been mitigation.

As stated in the Districts' memorandum (see Mission Village Final EIR (May 2011), **Appendix F4.22**), the temporary use of the Valencia WRP for treatment of Landmark Village and Mission Village wastewater does not eliminate the requirement for Newhall Land to both construct the Newhall Ranch WRP and finance the new sewerage system within the Specific Plan area. As stated above, the Interconnection Agreement provides the necessary land and infrastructure for the logical development and implementation of the Newhall Ranch WRP. The Interconnection Agreement was considered and approved by the District 26 and District 32 Boards at their January 9, 2002 meeting.

The Interconnection Agreement sets conditions under which the first 6,000 homes in Newhall Ranch may temporarily discharge wastewater to the Santa Clarita Valley Sanitation District's Valencia WRP. The conditions include payment of the standard connection fee (fair share of the cost of the existing infrastructure) and transfer of title of the 22-acre Newhall Ranch WRP site to the Newhall Ranch Sanitation District. Newhall Ranch residents also would pay the Santa Clarita Valley Sanitation District an annual service charge to recover the full cost of treating their wastewater at the Valencia WRP. Temporary treatment of wastewater at the Valencia WRP would not eliminate the need for the developer to finance and construct the Newhall Ranch WRP. Newhall, as the developer, must still construct the Newhall Ranch WRP and the new sewerage system for the Specific Plan area.

The Interconnection Agreement specifies that Newhall must fund construction of the Newhall Ranch WRP, which is contemplated to be constructed in stages as the Specific Plan area is developed, and it sets conditions under which the first 6,000 homes in Newhall Ranch (i.e., the Landmark Village and Mission Village projects) may temporarily discharge wastewater to the Valencia WRP.

Temporarily treating wastewater from the first 6,000 Newhall Ranch homes at the Valencia WRP is a practical engineering decision based on the need to build up an adequate, steady flow of wastewater before starting up the Newhall Ranch WRP. The Interconnection Agreement does not impact the Santa Clarita Valley Sanitation District's ability to comply with the chloride TMDL. As discussed above, the Valencia WRP has available capacity for interim treatment of Landmark Village and Mission Village wastewater. The Santa Clarita Valley Sanitation District supports this interim action for these same reasons. (Please refer to the Districts' memorandum, dated March 8, 2011. The memorandum and attachments are found in **Appendix F4.22** of the Mission Village Final EIR (May 2011).)

Responses to Comments regarding Construction of the Newhall Ranch WRP

Ventura County asks that if temporary use of the Valencia WRP for treatment of Landmark Village and Mission Village wastewater is allowed, what “guarantee” is there that the applicant (Newhall Land) “will ever build” the Newhall Ranch WRP? As stated in the Districts' memorandum, and in the Interconnection Agreement, the applicant (Newhall Land) is still required to construct the Newhall Ranch WRP, and the temporary use of the Valencia WRP does not eliminate the requirement for Newhall Land to both construct the Newhall Ranch WRP and finance the new sewerage system with the Specific Plan area. For further responsive information, please see **Topical Response 5: Chloride** and the Districts' memorandum (Mission Village Final EIR, May 2011, **Appendix F4.22**).



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

BOS-3 E-mails to Board of Supervisors from Various Individuals

Cieplik, Michael

From: westranchbeacon@gmail.com
Sent: Wednesday, October 19, 2011 2:06 PM
To: ExecutiveOffice; Michael D. Antonovich; PublicHearing
Subject: Support for the Approval of Mission Village

The over all Newhall Ranch Project is setting aside nearly 65% of the property to be preserved as natural open space, never to be disturbed by development, ever. There is a thoughtfulness going into the project that is intelligent, smart, well thought-out that will allow for more than 18,000 oak trees to be left intact and protected. It will also include hiking trails that will eventually connect to the Newhall Ranch High Country trails system.

The Mission Village project within Newhall Ranch will also create nearly 6000 jobs plus an additional 13,332 construction jobs. The planned Village Center will include main street oriented businesses, restaurants and shops around a public village green open for community events. This will give residents an opportunity to work close to home help to elevate freeway congestion and improving the environment.

This is an environmentally friendly project with more than 75 percent of the length of the Santa Clara River that runs through Mission Village will be left in its natural state, free of any kind of channels or artificial banks. It is designed to permanently protect aquatic, wetland and riparian habitats within the river corridor. The project's Spineflower Conservation Plan includes seven spineflower preserves (three located within Mission Village) designed to protect and provide undisturbed habitat for the rare species of tiny white flowers.

The local community has been kept apprised of this project over the years and the developer has listened to the communities input.

Please look at the facts and approve this project as it will benefit the entire Santa Clarita Valley and the North Los Angeles County regional economy.

Thank you,

-David Bossert

Cieplik, Michael

From: burdmom@msn.com
Sent: Wednesday, October 19, 2011 5:47 PM
To: ExecutiveOffice; Michael D. Antonovich; PublicHearing
Subject: Approval of Newhall Land's Mission Village

We've waited a long time for this great project to come to fruition. You approved the first tract map, Landmark Village earlier this month. Now it's time for the next tract map, Mission Village. It should be a simple decision to approve this next tract map, as it is in keeping with the Newhall Ranch Specific Plan, as it has previously been approved. Thank you for moving forward with the project. We are all looking forward to your sharing your support for Newhall Ranch with the County and urging them to support the Regional Planning commission approval of Mission Village.

Cieplik, Michael

From: ehopp@sbcglobal.net
Sent: Wednesday, October 19, 2011 4:46 PM
To: ExecutiveOffice; Michael D. Antonovich; PublicHearing
Subject: Newhall Ranch's Mission Village provides needed jobs

Please take the next step to move this project along. Not only will Newhall Land provide a well planned community, but much needed jobs in North LA County.

Cieplik, Michael

From: calvin.hedman@hedmanpartners.com
Sent: Wednesday, October 19, 2011 2:29 PM
To: ExecutiveOffice; Michael D. Antonovich; PublicHearing
Subject: Newhall Ranch - Mission Village approval

I support the approval of the Mission Village phase of Newhall Ranch. My position is based on the following:

Newhall Land has worked closely with the state and federal regulators to protect the environment as part of their plan.

The Newhall Ranch plan preserves more than 8,500 acres of open space.

Newhall Land will continue to work closely with environmental regulators to ensure compliance with the National Environmental Policy Act and the California Environmental Quality Act.

Thank you for your consideration.

Calvin Hedman, President
Hedman Partners

Cieplik, Michael

From: iainnadele@aol.com
Sent: Wednesday, October 19, 2011 9:05 PM
To: ExecutiveOffice; Michael D. Antonovich; PublicHearing
Subject: Newhall Ranch andMission Village carry on the success of Valencia

Newhall Land had a 100-plus year history in the Santa Clarita Valley and has always delivered on its promises. Valencia offers an incredible jobs-to-housing ratio that is unmatched anywhere else in LA County. I am confident that Newhall Ranch will carry on that tradition.

Cieplik, Michael

From: jbacker@jsbdev.com
Sent: Thursday, October 20, 2011 6:17 AM
To: ExecutiveOffice; Michael D. Antonovich; PublicHearing
Subject: Mission Village at Newhall Ranch

I have lived in the Santa Clarita Valley for 27 years and I have seen the quality of Newhall Land's projects enhance our quality of life. Not only will the project bring much-needed temporary and permanent jobs to our area, Mission Ranch will provide a new community for residents in our area. Communities are either living or dying and the lack of growth of the last few years cannot continue if we expect to be a vibrant community in the future.

Thank you for your consideration of Mission Ranch.

Cieplik, Michael

From: Larryr@spiritholding.com
Sent: Wednesday, October 19, 2011 4:09 PM
To: ExecutiveOffice; Michael D. Antonovich; PublicHearing
Subject: Benefit of Newhall Ranch

This project will create thousands of jobs .. please approve NOW!

Cieplik, Michael

From: cyndi@cyndilesinski.com
Sent: Wednesday, October 19, 2011 2:57 PM
To: ExecutiveOffice; Michael D. Antonovich; PublicHearing
Subject: Newhall Ranch

I am very excited that the new project is more ecofriendly then any other project in the area. It is great that this project is a LEED Silver certified project. Being an ecofriendly project was important to me. I look forward to the ongoing development of this project.

Cyndi Lesinski

Cieplik, Michael

From: lindenheim@aol.com
Sent: Wednesday, October 19, 2011 3:23 PM
To: ExecutiveOffice; Michael D. Antonovich; PublicHearing
Subject: Approve Mission Village and Move Forward on Newhall Ranch

The Newhall Ranch Specific Plan has been fully reviewed by the Regional Planning Commission, the Board of Supervisors, and the Superior Courts. This, and 20 years of public input led to your approval earlier this month of the Landmark Village Tract Map.

The second tract map, Mission Village, already approved by your Regional Planning Commission, is consistent with the approved specific plan and the first tract map.

I urge your approval of the Mission Village tract map.

Thank you for your consideration.

Cieplik, Michael

From: lloyd@sksm.com
Sent: Wednesday, October 19, 2011 2:54 PM
To: ExecutiveOffice; Michael D. Antonovich; PublicHearing
Subject: Approve Mission Village and let your blueprint for Newhall Ranch move forward.

Since Mission Village is consistent with Newhall Ranch Specific Plan which you already approved, and in line with the previous approval, it should be a simple decision for the county.

Cieplik, Michael

From: Medina, Katherine on behalf of ExecutiveOffice
Sent: Wednesday, October 19, 2011 5:37 PM
To: Cieplik, Michael; Umana, Ivonne
Subject: FW: Support of Newhall Ranch

The following e-mail is being forwarded to you from the Executive Office's Public Response e-mail for your review/information.

-----Original Message-----

From: TONYGLEWIS@YAHOO.COM [mailto:TONYGLEWIS@YAHOO.COM]
Sent: Wednesday, October 19, 2011 5:30 PM
To: ExecutiveOffice; Michael D. Antonovich; PublicHearing
Subject: Support of Newhall Ranch

This land will be developed and having a preplanned community such and mine in Valencia is a major advantage for the area and future residents!

Cieplik, Michael

From: 2invotec@att.net
Sent: Wednesday, October 19, 2011 3:14 PM
To: ExecutiveOffice; Michael D. Antonovich; PublicHearing
Subject: Mission Village

I fully support the Mission Village project and anxiously await it's completion.

Bob Ritchie
23331 Agramonte Drive
Newhall, CA 91321

Cieplik, Michael

From: scott@piu.org
Sent: Wednesday, October 19, 2011 2:20 PM
To: ExecutiveOffice; Michael D. Antonovich; PublicHearing
Subject: Newhall Ranch - 2

My family and I strongly support Newhall Ranch - 2. It will bring many jobs and opportunities to our community. It will also stimulate our city's economy for many years to come. I have lived in Valencia for 32 year and I do not plan on ever leaving!

Cieplik, Michael

From: steve@avmtech.com
Sent: Wednesday, October 19, 2011 2:19 PM
To: ExecutiveOffice; Michael D. Antonovich; PublicHearing
Subject: Newhall Ranch approvals by State and Federal regulators

I fully support the approval of Newhall Ranch. Newhall Land has worked closely with state and federal regulators, including the California Dept of Fish and Game, US Dept of Fish and Wildlife, Army Corps of Engineers and the EPA to ensure unprecedented environmental protection as part of their plan.

We need the continued growth in our valley and the jobs that this development will bring.

Cieplik, Michael

From: DEBBIEDWIGHT@EARTHLINK.NET
Sent: Wednesday, October 19, 2011 2:57 PM
To: ExecutiveOffice; Michael D. Antonovich; PublicHearing
Subject: Newhall Ranch means more jobs & a clean community.

The Newhall Ranch community will give our Valley additional jobs, a better community as well as access to more nature for our children & grandchildren.

Cieplik, Michael

From: Chris Austin [chrisaustincam@gmail.com]

Sent: Thursday, October 20, 2011 2:29 AM

To: Michael D. Antonovich; Yaroslavsky, Zev; Cieplik, Michael; Gloria Molina; SecondDistrict

Subject: Newhall Ranch, Mission Village Project # 04-181- (5), VTT Map #061105 and all other associated permits and entitlements

The Santa Clara River is the last free-flowing river in LA County and home to numerous endangered species. New information on several points must be evaluated before any approval.

1. With 10,000 units already approved but unbuilt in Santa Clarita, a high foreclosure rate and 29% commercial vacancy rate, we do not need this project at this time.
2. Project must meet chloride limits for the Santa Clara River
3. Pollution plume from the Whittiker Bermite munitions facility is spreading and has caused the closure of another ground water well. Water slated for the Newhall Ranch project must be re-directed to ensure clean water to the community of Santa Clarita.
4. This project will cause massive additional traffic and air pollution in an area already classified as "extremely hazardous" by US EPA. This project should not be approved at this time.
5. Lennar/Newhall has only recently emerged from bankruptcy. Now their stock has been down graded to BB (essentially junk bond status). How will they pay for needed infrastructure. We do not support tax payer money going to fund needs for large corporations such as Lennar.

Cieplik, Michael

From: bob dorn [dorndiego@gmail.com]
Sent: Tuesday, October 04, 2011 10:19 AM
To: PublicHearing
Subject: Santa Clara River

Please realize that you will be subjected to cynical attacks by proponents of the Newhall project; they'll say you have an opportunity to create jobs. It will be a distraction from the real issue.

The real issues are: who will buy the homes in this project? What will the infrastructure of roads and sewers and schools cost the public for a development that will sit empty until there's sufficient recovery of the general economy?

Don't create a ghost suburb out there. You will have the dubious distinction of destroying a natural environment and replacing it with a monument to greed.

Cieplik, Michael

From: Randy Martin [drrandymartin@gmail.com]
Sent: Thursday, October 20, 2011 2:53 AM
To: Randy Martin
Subject: Re: Newhall Ranch, Mission Village Project # 04-181- (5)

Dear Honorable Board of Supervisors:

I am asking you to vote NO on the Newhall Ranch, Mission Village Project next Tuesday October 25, 2011. The reasons for my request are the following:

1. With 10,000 units already approved but unbuilt in the SCV, a high foreclosure rate and 29% commercial vacancy rate, we do not need this project.
2. The project must first meet the chloride limits for the Santa Clara River
3. Pollution plume from the Whittaker Bermite munitions facility is spreading and has caused the closure of another ground water well. Water slated for this project must be re-directed to ensure clean water to the existing community of Santa Clarita.
4. There is already too much air pollution and traffic congestion in the SCV and on I-5. This project will dramatically increase both air pollution and traffic congestion.
5. Lennar/Newhall has only recently emerged from bankruptcy. Now their stock has been downgraded to BB -- How will they pay for the needed infrastructure. Would you want tax payer money going to fund this project?
6. The project is adjacent to the Santa Clara River and would require disruption to the natural channel of the River bank, destroy many Oaks Trees, and impact the endangered San Fernando Valley Spine Flower and the stickleback fish.

YOUR NO VOTE ON TUESDAY WILL BE THE RESPONSIBLE VOTE FOR THE PEOPLE OF LOS ANGELES AND THE EXISTING RESIDENTS OF SANTA CLARITA.

Thank You.

Dr. Randy Martin, OMD
Doctor of Oriental Medicine
Valencia, CA 91355

Cieplik, Michael

From: robert munsey [k6piu@instanet.com]
Sent: Wednesday, October 19, 2011 8:15 PM
To: PublicHearing
Subject: Newhall Ranch

Honorable County Supervisors:

I add my voice in the plea to stop the Newhall Ranch development. Let us not aggravate the serious vehicle traffic problems of the region and let's hold onto some of the increasingly vanishing native environment while it still exists. The advances in smog control over the several years past have been a credit to all involved. We really do not want to return to the times of smog that could be tasted and we do need to protect air that is healthful.

I thank you for your resistance to the named project.

Sincerely,
Robert Munsey
Winnetka, Ca

Cieplik, Michael

From: jnn@juno.com
Sent: Wednesday, October 19, 2011 6:10 PM
To: Cieplik, Michael
Subject: Santa Clarita River

Dear Supervisor Don Knabe,

The Santa Clara River is the last free-flowing river in LA County and home to numerous endangered species. New information on several points must be evaluated before any approval.

1. With 10,000 units already approved but unbuilt in Santa Clarita, a high foreclosure rate and 29% commercial vacancy rate, we do not need this project at this time.
2. Project must meet chloride limits for the Santa Clara River
3. Pollution plume from the Whittiker Bermite munitions facility is spreading and has caused the closure of another ground water well. Water slated for the Newhall Ranch project must be re-directed to ensure clean water to the community of Santa Clarita.
4. This project will cause massive additional traffic and air pollution in an area already classified as "extremely hazardous" by US EPA. This project should not be approved at this time.
5. Lennar/Newhall has only recently emerged from bankruptcy. Now their stock has been down graded to BB (essentially junk bond status). How will they pay for needed infrastructure. We do not support tax payer money going to fund needs for large corporations such as Lennar.

This gives you the opportunity to show all that you vote FOR the people's wants and needs.

Thanks very much.

Joanne Nagy
Granada Hills

Cieplik, Michael

From: marta Norton [monisnorton@att.net]
Sent: Wednesday, October 19, 2011 8:45 PM
To: PublicHearing
Subject: developments

Please do not continue to ruin this beautiful valley with more developments. We do not need any more homes built here. The river is the last natural river in this area. We are already very congested. We moved away from the valley and LA because we thought we would have peace here. This is all about greed. The developers do not care about current residents. For them it is all about profit. Why build more homes now? There are 4 beautiful homes for sale right here by my home in Canyon Country. All around this valley there are beautiful homes for sale. I take Newhall Ranch Road to take my son to work in Thousand Oaks. It is already getting very congested as it is an alternate road for many of us. We were so happy when the bridge opened up. Now we find out what was really going on--more building. This is very unfair to all of us.

Marta Norton
Santa Clarita Resident since 1988

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Cieplik, Michael

From: marta Norton [monisnorton@att.net]
Sent: Wednesday, October 19, 2011 9:54 PM
To: Michael D. Antonovich; Yaroslavsky, Zev; Cieplik, Michael; Gloria Molina; SecondDistrict
Cc: monisnorton@att.net
Subject: Newhall Ranch, Mission Village Project #04-181-(5),VTT map 061105

This letter is regarding the Newhall Ranch, Mission Village Project #04-181-(5),VTT map 061105 and all other associated permits and entitlements.

This project will be extremely harmful to the residents and delicate ecological balance close to the Santa Clara River. We are already dealing with Berrite and the aftermath. There is a 29% foreclosure rate so why do we need more homes built here? Most obviously, the project will cause additional traffic and air pollution in this once beautiful area already more smoggy than the San Fernando Valley. This area is already classified as extremely hazardous. I understand that Lennar Newhall has just emerged from bankruptcy and their stock is in junk bond status. These new structures will be need to be supported by a good infrastructure. Our streets and roads which take us out of this valley to earn our living are already super congested. Why on earth is this project even being considered? Is this more corporate greed? If this project continues, it will severely impact the quality of life in our valley. We left LA and the valley to find peace for ourselves and our children. I worked hard for 36 years of my 62 years in order to live in Santa Clarita and enjoy its beauty, excellent schools and neighbors. There are several for sale signs in our valley. I understand many of our residents are in foreclosure and those of us who still have jobs are unsure of the future. Southern California has become dirty, overcrowded and over built. Look at the once beautiful San Fernando Valley. Look what has happened due to unplanned building and greed. I grew up there and I do not even recognize it when I go down there. Santa Clarita is one of the few places left in Southern California in which we can raise our families feeling safe and happy. It will be a terrible shame if it becomes another overcrowded, dirty, unsafe place like other communities in Southern California have become.

Marta Franco-Norton
Santa Clarita Resident since 1988
Voting American Citizen

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Cieplik, Michael

From: kathy paddock [kadalap@gmail.com]
Sent: Wednesday, October 19, 2011 5:21 PM
To: Michael D. Antonovich; Yaroslavsky, Zev; Cieplik, Michael; Gloria Molina; SecondDistrict
Subject: Newhall Ranch Project

Distinguished Public Servant,

Please consider the following points when deciding whether or not to approve the 2nd phase of the Newhall Ranch Project.

1. With 10,000 units already approved but unbuilt in Santa Clarita, a high foreclosure rate and 29% commercial vacancy rate, we do not need this project at this time.
2. Project must meet chloride limits for the Santa Clara River
3. Pollution plume from the Whittiker Bermite munitions facility is spreading and has caused the closure of another ground water well. Water slated for the Newhall Ranch project must be re-directed to ensure clean water to the community of Santa Clarita.
4. This project will cause massive additional traffic and air pollution in an area already classified as "extremely hazardous" by US EPA. This project should not be approved at this time.
5. Lennar/Newhall has only recently emerged from bankruptcy. Now their stock has been down graded to BB (essentially junk bond status). How will they pay for needed infrastructure. We do not support tax payer money going to fund needs for large corporations such as Lennar.

The Santa Clara River is the last free-flowing river in LA County and home to numerous endangered species. Please stop the project from further development.

Thank you

Kathryn Paddock

Cieplik, Michael

From: Jan Scow [info@janscow.com]
Sent: Wednesday, October 19, 2011 5:11 PM
To: Yaroslavsky, Zev; SecondDistrict; Gloria Molina; Cieplik, Michael; Michael D. Antonovich
Cc: PublicHearing
Subject: Stop Newhall Ranch!

Respected Supervisors:

I am opposed to this project. I was opposed to it when there was a market for new housing, but I am REALLY opposed to it now that the real estate market has collapsed. The Santa Clara River is the last free-flowing river in LA County and home to numerous endangered species. New information on several points must be evaluated before any approval.

1. With 10,000 units already approved but unbuilt in Santa Clarita, a high foreclosure rate and 29% commercial vacancy rate, we do not need this project at this time.
2. Project must meet chloride limits for the Santa Clara River
3. Pollution plume from the Whittiker Bermite munitions facility is spreading and has caused the closure of another ground water well. Water slated for the Newhall Ranch project must be re-directed to ensure clean water to the community of Santa Clarita.
4. This project will cause massive additional traffic and air pollution in an area already classified as "extremely hazardous" by US EPA. This project should not be approved at this time.
5. Lennar/Newhall has only recently emerged from bankruptcy. Now their stock has been down graded to BB (essentially junk bond status). How will they pay for needed infrastructure. We do not support tax payer money going to fund needs for large corporations such as Lennar.

Thank you for your NO vote!

Jan C. Scow
Sustainable Gardens
818 789-9127

We live in a great nation, but we are suffering paralyzing difficulties. What made our nation great was our ability to stand together and work for the common good. Until we can learn once again to stand together, we will not resolve our difficulties.

jcs

Cieplik, Michael

From: M Shuler [alsvid1@hotmail.com]
Sent: Wednesday, October 19, 2011 8:04 PM
To: Cieplik, Michael
Subject: Newhall Ranch, Mission Village Project

Dear Supervisor Knabe,

The Santa Clara River is the last free-flowing river in LA County and home to numerous endangered species. New information on several points must be evaluated before any approval.

1. With 10,000 units already approved but unbuilt in Santa Clarita, a high foreclosure rate and 29% commercial vacancy rate, we do not need this project at this time.
2. Project must meet chloride limits for the Santa Clara River
3. Pollution plume from the Whittiker Bermite munitions facility is spreading and has caused the closure of another ground water well. Water slated for the Newhall Ranch project must be re-directed to ensure clean water to the community of Santa Clarita.
4. This project will cause massive additional traffic and air pollution in an area already classified as "extremely hazardous" by US EPA. This project should not be approved at this time.
5. Lennar/Newhall has only recently emerged from bankruptcy. Now their stock has been down graded to BB (essentially junk bond status). How will they pay for needed infrastructure. We do not support tax payer money going to fund needs for large corporations such as Lennar.

Sincerely,
Margaret Shuler

10/20/2011

Cieplik, Michael

From: TJSHANER@AOL.COM
Sent: Wednesday, October 19, 2011 3:41 PM
To: ExecutiveOffice; Michael D. Antonovich; PublicHearing
Subject: Approval of Mission Village second phase.

As much as I would like to support this I'm also concerned that continued construction of new homes in the Santa Clarita Valley will put an even greater burden on our utilities and infrastructure. The roads maintained by LA County are crumbling with no repairs in sight. The traffic on the 5 Frwy is greater than its ever been with smog emmissions at an all time high. More homes just means more cars, more traffic and more pollution.
Tim Shaner

Executive Office
Los Angeles County Board of Supervisors
500 W. Temple St.
Los Angeles, CA 90012
RE: Mission Village/Newhall Ranch

October 6th, 2011

2011 OCT 11 AM 9:24

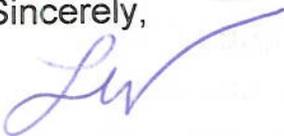
BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

Dear Madam or Sir,

Please answer these concerns I have as a resident of Castaic in the Santa Clarita Valley.

- ❖ We have water well contamination issue in our valley which is not being properly addressed. Are you familiar with the spreading contamination we have here by a chemical, Perchlorate ?
- ❖ Water contamination goes hand in hand with available water supply. We live in a desert, bringing most of our water from distant sources. The stress of this huge development's water demands are still not being addressed realistically.
- ❖ We are in a housing slump with many builders leaving their plans on the table. Why would Newhall Land/Lenmark be investing in this huge building project at this time? Where is the money? I have read the Newhall Land is bankrupt. This does not make sense.
- ❖ Last but certainly FIRST in my mind, is the free flowing Santa Clara River. I have given you tangibles to consider, such as water quality and availability, economic distress and financial solubility. Let me remind you of the intangibles that make living here so desirable. Open space and natural beauty are still to be found in our valley. Please think of the future you are making now.

Sincerely,



Lynne Winner

31202 Quail Valley Road, Castaic 91384

**Index of E-mails Received
(in Alphabetical Order)**

DATE	ALPHA NAME	E-MAIL AUTHOR	LOCATION IN CALIFORNIA
In Support			
10/19/11	Bossert	David Bossert	West Ranch
10/19/11	Burdmom	Burdmiom@msn.com	Unknown
10/19/11	ehopp	ehopp@sbcglobal.net	Unknown
10/19/11	Hedman	Calvin Hedman	Unknown
10/19/11	iainnadele	iainnadele@aol.com	Unknown
10/20/11	Jbacker	jbacker@sbdev.com	Santa Clarita Valley
10/19/11	Larryr	Larryr@spiritholding.com	Unknown
10/19/11	Lesinski	Cyndi Lesinski	Unknown
10/19/11	lindenheim	lindenheim@aol.com	Unknown
10/19/11	lloyd	Lloyd@sksm.com	Unknown
10/19/11	Tonyglewis	Tonyglewis@yahoo.com	Unknown
10/19/11	Ritchie	Bob Ritchie	Newhall
10/19/11	scott	scott@piu.org	Valencia
10/19/11	steve	steve@avmtech.com	Unknown
10/19/11	Debbiedwight	Debbiedwight@earthlink.net	Unknown
Opposed			
10/20/11	Austin	Chris Austin	Unknown
10/04/11	Dorn	Bob Dorn	Unknown
10/20/11	Martin	Dr. Randy Martin, OMD	Valencia
10/19/11	Munsey	Robert Munsey	Winnetka
10/19/11	Nagy	Joanne Nagy	Granada Hills
10/19/11	Norton	Marta Norton	Santa Clarita
10/19/11	Norton	Marta Franco-Norton	Santa Clarita
10/19/11	Paddock	Kathryn Paddock	Unknown
10/3/11	Paladin	John Paladin	Valencia
10/19/11	Scow	Jan Scow	Unknown
10/19/11	Shuler	Margaret Shuler	Unknown
10/19/11	Tjshaner	Tjshaner@aol.com	Unknown
10/6/11	Winner	Lynne Winner	Castaic

Several e-mails were received by the Executive Office of the County Board of Supervisors from October 4, 2011 through October 20, 2011. Several e-mails were received by the Executive Office that support approval of the Mission Village project. In addition, several of the e-mails oppose approval of the Mission Village project, and virtually all of those e-mails repeat the following general environmental issues: protect the Santa Clara River and address floodplain impacts; require the Mission Village project to meet chloride limits; model/monitor ammonium perchlorate in the groundwater basin; address air quality and traffic issues; and deny the project due to the 2008 bankruptcy of the entity with the ownership interest in the Newhall Land and Farming Company, the project applicant for the Mission Village project. Note that Topical Responses from the Final EIR and the Additional Environmental Information document referenced in this response are presented in a separate section entitled "Referenced Topical Responses." An alphabetical list is attached to this response, which identifies those who submitted e-mails for and against the Mission Village project.

Response to Comments In Support of the Mission Village Project

Several of the comment letters indicate support for the Mission Village project. Because the comments do not point to any specific "inadequacy" in the environmental analysis of the Mission Village project, no further response is required.

Response to Comments regarding the Santa Clara River and Floodplain Impacts

Below are responses to the general comments raised in the opposition e-mails. Please note that the responses are necessarily general in nature, because the e-mails did not identify any specific claimed inadequacy of either the Mission Village project or the related environmental documentation.

Most of the e-mails call for protection of the Santa Clara River and request that floodplain impacts be evaluated before any approval of the proposed project. None of the comments cite or refer to any part of the Mission Village Draft or Final EIRs or to any of the technical reports appended to the EIRs, nor do they question the legal adequacy of any EIR section or report.

The environmental impacts to the Santa Clara River, including the 100-year floodplain, were addressed comprehensively in the Mission Village Final EIR.¹ Please see, specifically, the Mission Village Final EIR, **Section 4.2, Hydrology; Section 4.3, Biota; and Section 4.21, Floodplain Modifications**. In summary, the EIR sections evaluate the Mission Village project's impacts on the Santa Clara River and floodplain, and

¹ The Mission Village Final EIR is comprised of: (a) Draft EIR (October 2010), Volumes I-XX; and (b) Final EIR (May 2011), Volumes I-VII (collectively, "Final EIR").

find that the project does not result in any significant unavoidable impacts to the river or floodplain. Instead, the EIR analyses show that while there are project impacts to the river and floodplain, those impacts either are not significant or have been avoided or substantially minimized due to the revised project design and associated mitigation measures.

Because the comments do not point to any specific “inadequacy” in the environmental analysis of the Mission Village project, no further response can be provided or is required.

Response to Comments regarding Chloride

Most of the e-mails state generally that the Mission Village project “must meet chloride limits for the Santa Clara River.” None of the comments cite or refer to any part of the Mission Village Draft or Final EIRs or to any of the technical reports appended to the EIRs, nor do they question the legal adequacy of any specific EIR section or report.

Both the Mission Village Draft and Final EIRs thoroughly address chloride levels in the Santa Clara River and the applicable regulatory chloride effluent limits for discharges to the Santa Clara River. Please see, specifically, the Mission Village Final EIR, **Section 4.22, Water Quality**, and the Water Quality Technical Report (2011) prepared by Geosyntec Consultants, which is found in **Appendix F4.22** of the Final EIR. In addition, the Mission Village Final EIR (October 2011), Volume I, and this Additional Environmental Information document, **Topical Response 4: Revised Project Design**; and **Topical Response 5: Chloride**, provide detailed responses to all chloride-related comments (attached).

Because the comments do not point to any specific “inadequacy” in the environmental analysis of the Mission Village project, no further response can be provided or is required.

Response to Comments regarding Perchlorate

Most of the e-mails repeat the claim that “[n]ew modeling of the ammonium perchlorate plume is needed to ensure safe drinking water,” pointing to the closure of a Valencia Water Company municipal supply well in the Saugus Formation. The comments also state that “[w]ater slated for the Newhall Ranch project must be re-directed to ensure clean to the community of Santa Clarita.” No expert or technical data is provided to support these claims. In addition, none of the comments cite or refer to any part of the Mission Village Draft or Final EIRs or to any of the technical reports appended to the EIRs, nor do they question the legal adequacy of any specific EIR section or report.

Nonetheless, it is important to note that Well 201 was taken out of service in August 2010, and has not been returned to municipal supply service since that time. It also is not relied upon as a municipal supply source in the recently adopted 2010 Urban Water Management Plan. Instead, Valencia Water Company’s

plan is to remediate the well by either permanently taking it out of service and replacing it with a new well in a non-perchlorate impacted portion of the groundwater basin, or adding wellhead treatment to the well, so that the water can be treated to “non-detect” levels. However, before either remediation option takes place, Valencia Water Company has committed to working with CLWA and the regulatory agencies (e.g., Department of Public Health) before implementation of either remediation option. This includes an ongoing effort by the Valencia Water Company and CLWA to update the existing groundwater modeling to assist in addressing questions from the regulatory agencies.²

In response, the Mission Village Final EIR, **Section 4.8, Water Service**, provides a lengthy analysis of the detection of perchlorate in the Santa Clarita Valley groundwater basin, and identifies the treatment that is available to remove perchlorate to “non-detect.” **Section 4.8** also evaluates the recent closure of Valencia Water Company’s Well 201, which is located in the Saugus Formation. Based on the technical analysis provided in **Section 4.8**, the EIR finds that, even with the detection of perchlorate, an adequate supply of water is available to serve the Mission Village project and that the project will not contribute to any significant water supply impacts in the Santa Clarita Valley.

Specific to perchlorate, the EIR finds that the Mission Village project will be served by local groundwater resources from the Alluvial aquifer from wells located along Castaic Creek, which is over 4 miles west of the former Whittaker-Bermite facility, the source of the perchlorate contamination in a portion of the groundwater basin; and, therefore, the Mission Village project is not considered to be at risk due to perchlorate contamination released from the former Whittaker-Bermite facility. In addition, the quality of the groundwater available from the Alluvial aquifer near the Mission Village project site has been tested, and the results from laboratory testing of the wells expected to serve the project site indicate that all constituents tested were at acceptable levels for drinking water. Perchlorate was included in the testing, and it was “non-detect.”

In addition, this document contains a topical response addressing perchlorate and treatment (see **Topical Response 9: Perchlorate Treatment Update**, which is attached).

Based on the analysis provided in **Topical Response 9**, substantial progress has been made in responding to the detection of perchlorate, and substantial facilities needed for remediation/treatment are in place and actively monitored by the Castaic Lake Water Agency (CLWA), the local retail suppliers, and several regulatory agencies. The available evidence supports the conclusion reached in the Mission Village Final EIR that there is an adequate water supply available to serve projected needs of the Mission Village project and other existing and planned development in the Santa Clarita Valley.

² Pers. Comm. Keith Abercrombie, General Manager, Valencia Water Company, September 30, 2011.

In addition, **Topical Response 9** summarizes the monitoring already in place through the appropriate regulatory agency. In summary, the California Department of Public Health (DPH) recently corresponded with two of the retail water suppliers in the Santa Clarita Valley (Newhall County Water District and Valencia Water Company), and requested that both entities increase perchlorate monitoring from annually to quarterly at specified wells. Both entities have confirmed that they will conduct perchlorate monitoring quarterly as requested by DPH; therefore, adequate oversight from the appropriate regulatory agency is in place.

In addition, **Topical Response 9** addresses the active monitoring conducted by CLWA and the retailers with respect to the potential spread of perchlorate to other areas of the basin. In summary, CLWA has invested substantial funds in the implementation of its Saugus Perchlorate Facility, a \$13 million facility located near Bouquet Canyon Road and the Santa Clara River. This facility is designed to restore groundwater production capacity impacted by perchlorate contamination and control the migration of perchlorate from the site of the former Whittaker-Bermite site. This facility is part of a larger regulatory program, which includes the restoration of the Saugus 1 and Saugus 2 wells, to extract contaminated groundwater and control migration of perchlorate in the Saugus Formation aquifer. The cost of the facility and the larger regulatory program are covered under the 2007 settlement agreement, which protects the public from paying for the remediation costs. Prior to its operation, CLWA's facility was authorized by DPH.

CLWA and the retail water suppliers in the Santa Clarita Valley also recently adopted the 2010 Urban Water Management Plan (2010 UWMP). As part of the 2010 UWMP, CLWA and the retailers thoroughly addressed groundwater quality in the Santa Clarita Valley, including the detection of perchlorate in portions of the groundwater basin. The Additional Environmental Information document summarizes the key elements of the 2010 UWMP in **Topical Response 7: 2010 Urban Water Management Plan**, which is attached. CLWA and the retailers found that even with the detection of perchlorate in Valencia's Well 201, there are adequate, available supplies to meet the existing and projected water needs of the Santa Clarita Valley through 2050.

Because the comments do not point to any specific "inadequacy" in the environmental analysis of the Mission Village project, no further response can be provided or is required.

Response to Comments regarding Traffic and Air Quality

The e-mail comments state that the Santa Clarita Valley already is experiencing severe air quality impacts and traffic congestion and that the proposed project will worsen those conditions. No expert or technical data is provided to support these claims. In addition, none of the comments cite or refer to any part of the

Mission Village Draft or Final EIRs or to any of the technical reports appended to the EIRs, nor do they question the legal adequacy of any specific EIR section or report.

The Mission Village Final EIR thoroughly evaluated the traffic and air quality impacts associated with the Mission Village project and other cumulative development in the Santa Clarita Valley. Please see, specifically, the Mission Village EIR, **Section 4.5, Traffic/Access**; and **Section 4.7, Air Quality**. Because the comments do not point to any specific “inadequacy” in the environmental analysis of the Mission Village project, no further response can be provided or is required.

Response to Comments regarding Bankruptcy

The e-mails state generally that approval of the Mission Village project is “not fiscally responsible,” because of a 2008 bankruptcy of the entity with the ownership interest in the Newhall Land and Farming Company, the project applicant for the Mission Village proposed project. The bankruptcy topic was raised in comments on the Mission Village Draft EIR. The Mission Village Final EIR includes a topical response addressing such comments. Please refer to **Topical Response 2: Bankruptcy-Related Comments** (attached).

In summary, the topical response states that the applicant has emerged from Chapter 11 bankruptcy with the resources and financial flexibility necessary to move forward with implementation of the Mission Village project and that, if the County certifies the EIR and approves the project, then the County also would adopt a Mitigation Monitoring and Reporting Plan (MMRP), which would ensure implementation, monitoring, and enforcement of all adopted mitigation measures.

Thus, the adopted MMRP provides the County with adequate assurances that the applicant will be required under the California Environmental Quality Act (CEQA) to implement the adopted mitigation measures or not proceed with the project. At the final subdivision map stages, subdivision improvement agreements, bonds, and other adequate financial assurances also are required, which ensure performance of the mitigation measures and conditions of approval in conjunction with the project, if approved.

Because the comments do not point to any specific “inadequacy” in the environmental analysis of the Mission Village project, no further response can be provided or is required.



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

Referenced Topical Responses

October 2011

Topical Response No. 2: Bankruptcy-Related Comments

The following provides a comprehensive response to those comments received on the Mission Village Draft EIR that generally question the bankruptcy or financial viability of the project applicant, The Newhall Land and Farming Company (Newhall).

Legal Overview and Response Summary

As a threshold legal matter, CEQA does not require that economic data be included in an EIR. (*CEQA Guidelines*, Section 15131.) “[A]n EIR is an *environmental* impact report. As such, it is an informational document, not one that must include ultimate determinations of economic feasibility.” (*San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656, 689, emphasis in original.) Nor is the financial status of a project applicant relevant evidence of a project’s feasibility. (*See Uphold Our Heritage v. County of Woodside* (2007) 147 Cal.App.4th 587, 599-600 [“CEQA should not be interpreted to allow discrimination between project applicants for an identical project based upon the financial status of the applicant.”].)

Nonetheless, the County will respond to the comments. As discussed below, the applicant has emerged from bankruptcy as a reorganized entity with the resources and financial flexibility to move forward with implementation of the Mission Village proposed project. Further, if the project is approved, the County would adopt a mitigation monitoring or reporting program, pursuant to Public Resources Code, section 21081.6, to ensure that the mitigation measures it has adopted to mitigate or avoid significant impacts of the project are implemented.

Bankruptcy Filing and Status

On June 8, 2008, LandSource Communities Development, LLC, owner of the applicant (Newhall), filed a voluntary petition for chapter 11 bankruptcy protection in the U.S. Bankruptcy Court for the District of Delaware in Wilmington. As a LandSource subsidiary, Newhall was included in the bankruptcy filing. The bankruptcy filing was brought about because LandSource was unable to reach agreement with its lenders on a plan to modify and restructure its debt, all of which occurred in conjunction with a dramatic, precipitous decline in real estate values in California and throughout the nation.

As background, chapter 11 is the business reorganization chapter of the Bankruptcy Code. It promotes equal treatment for similarly situated holders of claims and equity interests, subject to the distribution priorities prescribed by the Bankruptcy Code. Commencement of a chapter 11 case creates an estate that comprises all of the legal and equitable interests of the debtor as of the commencement of the case. The Bankruptcy Code provides that a debtor may continue to operate its business and remain in possession of its property as a debtor in possession (DIP). Consummating a plan of reorganization is the principal objective of a chapter 11 case.

2.0 Topical Responses, Comment Letters, and Responses to Comment Letters

A bankruptcy court's confirmation of a reorganization plan binds the debtor, any entity acquiring property under the plan, any holder of a claim or equity interest in a debtor, and all other entities as may be ordered by the bankruptcy court, to the terms and conditions of the confirmed reorganization plan.

Prior to soliciting acceptances of a proposed chapter 11 reorganization plan, the Bankruptcy Code requires a plan proponent to prepare a disclosure statement (Disclosure Statement). The statement is to contain information, in sufficient detail, to enable a hypothetical reasonable investor to make an informed judgment about acceptance of the chapter 11 reorganization plan. After a hearing, the bankruptcy court may approve, deny, or modify the disclosure statement as containing adequate information pursuant to the Bankruptcy Code. If approved, the proponent of the reorganization plan seeks bankruptcy court confirmation of the plan.

In early June 2009, Barclays Bank PLC, for itself and other banks and financial institutions, proposed amended joint chapter 11 plans for reorganization of LandSource and each of its affiliated debtors (Plan). Barclays also provided required disclosure statements, describing the Plan and providing creditors with the opportunity to review and vote on the proposed Plan. On July 20, 2009, after hearings, the Bankruptcy Court entered findings, conclusions, and an order confirming the Plan (Confirmation Order). This Confirmation Order confirmed the Plan as having satisfied the requirements of chapter 11 of the Bankruptcy Code, and authorized the debtors to implement the Plan effective July 31, 2009.

According to the approved Disclosure Statement, the Plan provides for the reorganization of LandSource and each of the debtor entities, with ownership of the reorganized debtors and their respective assets vesting in the applicable reorganized debtor, "free and clear of all claims, liens, charges, encumbrances, and interests of claims and interest holders," except as set forth in the Plan. As a result of the reorganization, LandSource has emerged from chapter 11 bankruptcy as "Newhall Land Development LLC."

Based on the approved Disclosure Statement and Plan, the new company (Newhall Land Development LLC) has working capital of more than \$90 million in cash and no debt on its beginning balance sheet, and it will have additional resources and financial flexibility necessary to focus on planning and developing the Newhall Ranch Specific Plan and the remainder of the existing Valencia community. Based on the bankruptcy-related documents, Newhall is backed by ownership consisting of a group of investment funds, along with Lennar Corp. (Lennar), and will be managed by Emile Haddad, the CEO of Five Point Communities Management, Inc. (Five Point), a newly formed management company jointly owned by Mr. Haddad and Lennar. Mr. Haddad resigned as Lennar's Chief Investment Officer to assume his new duties at Five Point.

Five Point will augment Newhall Land's existing management team, which has several years of combined real estate and land development experience. In summary, LandSource and Newhall are no longer in bankruptcy due to the successful reorganization.

The approved Disclosure Statement, the Plan, and the Bankruptcy Court's Confirmation Order provide additional technical information concerning the bankruptcy and the reorganization efforts. These documents are incorporated by reference and available for public review and inspection upon request at the County of Los Angeles, Department of Regional Planning, 320 West Temple Street, Los Angeles, California 90012.

Conclusion

As demonstrated above, the applicant has emerged from chapter 11 bankruptcy with the resources and financial flexibility necessary to move forward with development of the Mission Village proposed project. In addition, if the County certifies the EIR and approves the Mission Village project, then the County would also adopt a Mitigation Monitoring and Reporting Program (MMRP), which would ensure implementation, monitoring, and enforcement of all adopted mitigation measures. The adopted MMRP provides the County with adequate assurances that the applicant will be required under CEQA to implement the adopted mitigation measures, or not proceed with its project. At the final subdivision map stages, subdivision improvement agreements, bonds, and other adequate financial assurances also will be required to ensure performance of the mitigation adopted in conjunction with the project, if approved.

Updated Topical Response 4: Revised Project Design

1.0 Introduction and Revised Project Design Overview

On December 3, 2010, the California Department of Fish and Game (CDFG) certified the EIR portion of the Newhall Ranch Resource Management Development Plan and Spineflower Conservation Plan (RMDP/SCP) and the related Environmental Impact Statement/Environmental Impact Report (EIS/EIR). Concurrently, CDFG issued final approvals for the RMDP/SCP project, including a master streambed alteration agreement and two incidental take permits, one of which is specific to the San Fernando Valley spineflower (spineflower). (For detailed information regarding the RMDP/SCP project and its relationship to the Mission Village project, please see **Topical Response 1: Newhall Ranch RMDP/SCP Project and Associated EIS/EIR.**)

CDFG's issuance of the spineflower incidental take permit was based upon a Final SCP (2010) and the underlying preserve system design covering the applicant's land holdings in Los Angeles County (i.e., Newhall Ranch Specific Plan, Entrada, and Valencia Commerce Center). The Final SCP represents a modification to the preserve system design identified in the 2007 SCP, which served as the basis for the spineflower preserve described in the Mission Village Draft EIR. As the Final SCP (2010) is part of CDFG's approvals of the RMDP/SCP project and associated Final EIS/EIR, the County will approve the proposed Mission Village project only if it is consistent with the Final SCP (2010). Accordingly, the County directed the project applicant to submit a revised Vesting Tentative Tract Map (VTTM), ~~referred to herein as the "revised project,"~~ that, among other things, reflects expanded preserves for the spineflower and a smaller development footprint consistent with the CDFG-approved Final SCP (2010).

In response, the applicant revised the originally proposed ~~project~~ VTTM, which was analyzed in the Draft EIR, consistent with the County's direction and CDFG comments. ~~This Topical Response describes the revisions to the original project and the changes in environmental impacts that would result from the revised project.~~

The County also has asked that the applicant address the potential significant impacts on the environment of constructing and operating interim chloride reduction facilities to further treat Newhall Ranch project wastewater on an interim basis at the Valencia Water Reclamation Plant (WRP), if needed. In response to the County's directive, the applicant has refined the proposed project to accommodate both the revised VTTM and the interim chloride reduction facilities.

These refinements (i.e., the revised VTTM and the interim chloride reduction facilities), if approved by the County, would comprise the project revisions, or the "revised project," evaluated in this Topical Response. This Topical Response describes the revisions to the original project and then analyzes their

environmental effects (i.e., the changes in environmental impacts that would result from the revised project) to determine if they give rise to any new significant environmental impacts or result in a substantial increase in the severity of an environmental impact beyond those already evaluated in the Mission Village EIR (see *State CEQA Guidelines* Section 15088.5).

A. Project Land Use Revisions

While the boundary of the VTTM is unchanged and remains 1,261.8 acres in size, the revised project would result in a slight increase in the overall Mission Village project site from 1,854.6 acres to approximately 1,860 acres (a 5.4-acre increase) due to the addition of the interim chloride facilities.

Specific to the VTTM, Table TR4-1, Mission Village Revised VTTM Statistical Summary, provides a comparison of the original project Mission Village project VTTM (the subject of the Draft EIR) and the revised project VTTM (the subject of this topical response) by way of a land use statistical summary. The revised VTTM is shown on **Figure F-3, Revised Vesting Tentative Tract Map.** The revisions to the original project also are illustrated on **Figure F-1, Plant Communities at the Revised Mission Village Project Site, Project Boundary,** and the revisions relative to the expanded spineflower preserves are shown on **Figure F-2, Additional Spineflower Preserves at the Revised Mission Village Project Site,** and **Figure F-3, Revised Vesting Tentative Tract Map,** below. A narrative summary of the key changes to the original project VTTM studied in the Draft EIR is provided below.

- **Residential Dwelling Units:** The total number of proposed residential dwelling units has decreased from 4,412 to 4,055, a decrease of 357 total units. The number of single-family units decreased by 31 from 382 to 351, and the number of multi-family units decreased by 326 from 4,030 to 3,704.
- **Development/Grading Footprint:** The size of the development/grading footprint on the project site has decreased ~~by 21~~ from 1,153.4 acres to 1,134.6 acres (a ~~218.8 acres and~~ approximately 1.6 percent decrease). The total amount of grading associated with the project has decreased by 1 million cubic yards, from 29.9 to 28.9 million cubic yards.
- **San Fernando Valley Spineflower Preserves:** The number of lots dedicated to spineflower preserves has increased from two to five. The total land area dedicated for preserves has increased from 65.6 to 85.8 acres. The additional spineflower preserves are depicted on Figure F-~~32~~, Additional Spineflower Preserves at the Revised Mission Village Project Site.
- **Oak Trees:** Under the original project, of the 564 trees protected by County Ordinance, 158 trees would be removed, 51 trees would be encroached upon, and 355 trees would not be

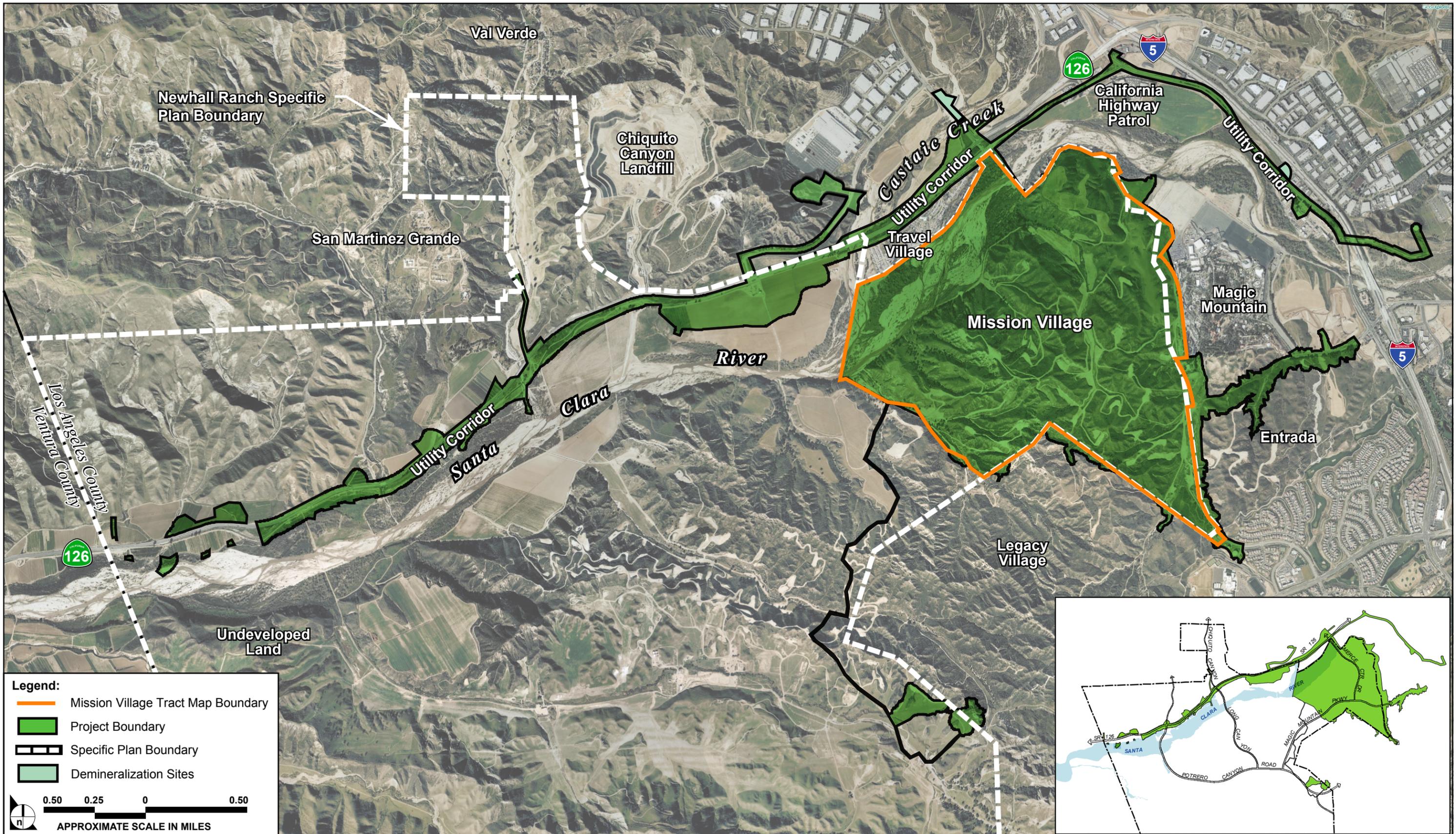
impacted. Under the revised project, the total number of trees to be removed would decrease by four from 158 to 154. The total number of trees to be encroached upon would increase by one from 51 to 52.

- **Open Space:** The revised project's total land area dedicated to open space-related land use categories, which includes parks, recreation areas, spineflower preserves, River area, and graded and ungraded lots, has increased from approximately 636 to 693 acres (approximately 57 acres, or approximately nine percent). This increased open space area includes the additional spineflower preserves (originally 65.6 acres with an increase of approximately 20.2 acres) ~~and, for a revised total of 85.8 acres;~~ un-graded open space (originally 63.1 acres with an increase of 1.9 acres for a revised total of 65.0 acres); and graded open space (~~36~~originally 249.4 acres increased by 40.3 acres for a revised total of 287.8 acres). While the amount of River Corridor area has decreased by 4.4 acres, from 217.0 to 212.6 acres, the 4.4 acres is now located within one of the new spineflower preserves.

2- B. Wastewater Plan

Both the Mission Village Draft EIR and Landmark Village Recirculated Draft EIR described and analyzed each project's wastewater/sewer plan, including the routing of sewer lines and the delivery system to serve each project site within the approved Newhall Ranch Specific Plan. As stated in each EIR, the long-range plan is for the Newhall Ranch WRP to be constructed to serve uses within the Specific Plan area, and the new County sanitation district (i.e., Newhall Ranch County Sanitation District or NRSD) has been formed to implement the Newhall Ranch WRP, and to coordinate with the Santa Clarita Valley Sanitation District of Los Angeles County, or SCVSD, with regard to the establishment of the new Newhall Ranch sanitation district and its WRP and sewerage conveyance system. This coordination enables the County to verify that the Newhall Ranch development is consistent with the County's General Plan and Specific Plan buildout requirements. Part of this coordination involved Newhall entering into the Interconnection Agreement, dated January 9, 2002, with the Sanitation District Nos. 26 and 32, later consolidated as the SCVSD.⁴

⁴ A copy of the Interconnection Agreement is found in **Appendix F4.9** of the Mission Village Final EIR (May 2011).



Legend:

- Mission Village Tract Map Boundary
- Project Boundary
- Specific Plan Boundary
- Demineralization Sites

0.50 0.25 0 0.50
 APPROXIMATE SCALE IN MILES

SOURCE: AirPhoto USA – 2006, Impact Sciences, Inc. – August 2010

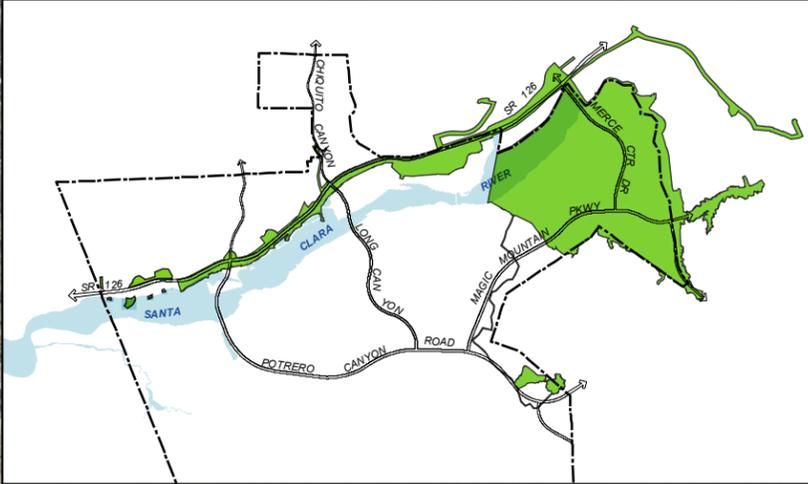


FIGURE F-1

Project Boundary/Environmental Setting

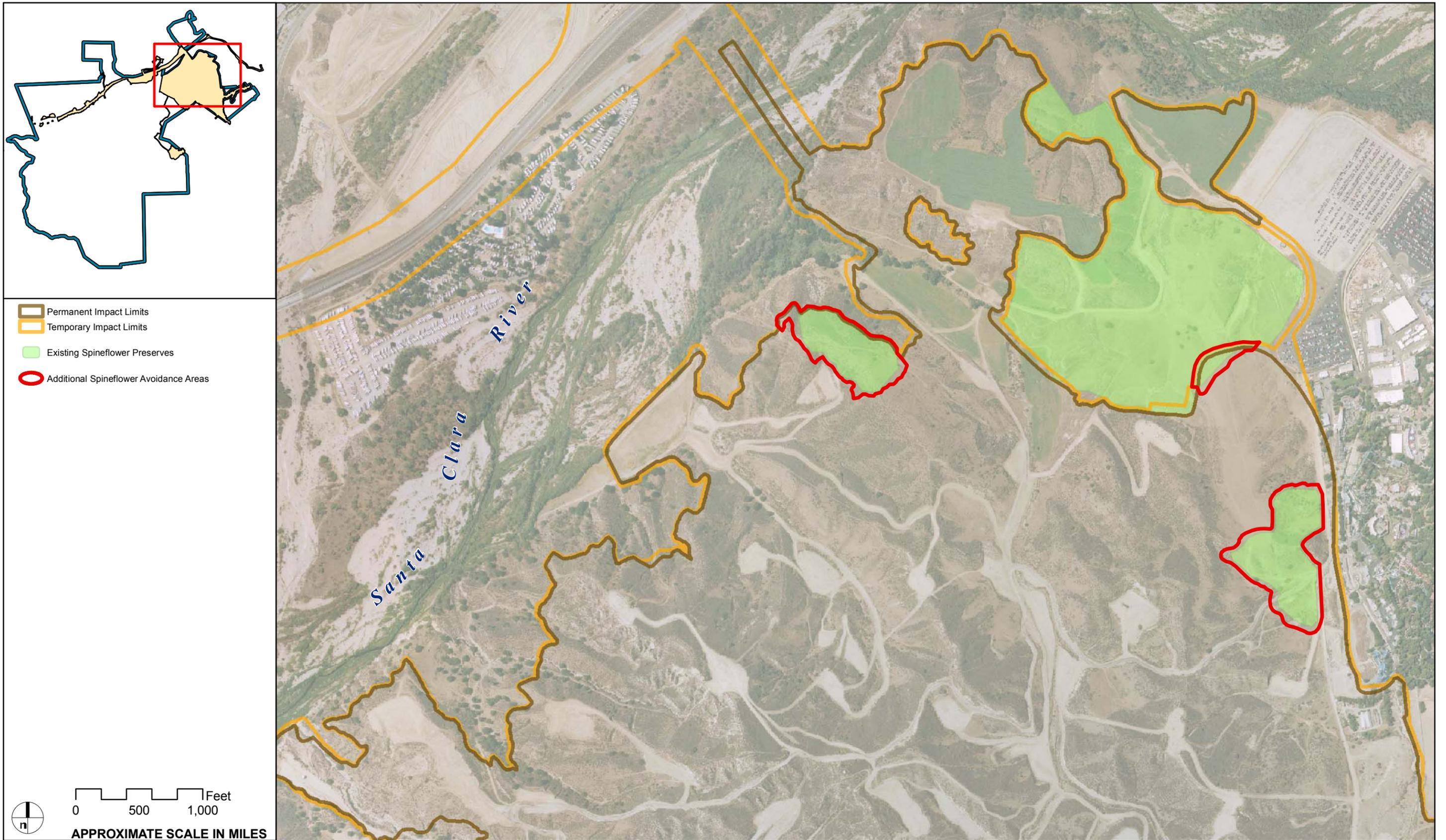


FIGURE F-2

Additional Spineflower Preserves at the Revised Mission Village Project Site



Legend:

 Vesting Tentative Tract Map Boundary



1500 750 0 1500

APPROXIMATE SCALE IN FEET

SOURCE: Impact Sciences, Inc. – April 2011

FIGURE **F-3**

Revised Vesting Tentative Tract Map

**Table TR4-1
Mission Village Revised VTTM Statistical Summary**

Land Use	Area (gross acres)		Lots		Lot Sizes or Square Footages		Total Units or Square Footage		Avg. Density (du/acre or FAR)	
	Original	Revised	Original	Revised	Original	Revised	Original	Revised	Original	Revised
Residential										
Single-Family	132.5	88.8	382	351	4,000/ 6,050/ 7,150	4,000/ 5,500/ 6,600	382 du	351 du	1-8.9	1-8.9
Multi-Family	210.7	211.6	38	38			4,030 du	3,704 du	4.7-55	4.7-55
Apartments/condominiums	32.4	22.1	5	5						
Continued Care Retirement Community	13.6	13.6	1	1						
Subtotal (Residential)	389.2	336.1	426	395			4,412 du	4,055 du		
Mixed-Use/Commercial	57.4	57.4	11	11			1,555,100 SF	1,555,100 SF	0.6 FAR	0.6 FAR
Elementary School	9.5	9.5	1	1						
Other										
Open Space										
River *	217.0	212.6	4	4						
Un-graded lots	63.1	65.0	10	12						
Graded lots	249.4	287.8	136	127						
Public Park (active)	26.1	26.8	2	2						
Private Recreation	14.7	14.7	4	4						
Spineflower Preserve	65.6	85.8	2	5						
Subtotal (Open Space)	635.9	692.7	158	154						
Library	3.3	3.3	1	1						
Fire Station	1.5	1.5	1	1						

Land Use	Area (gross acres)		Lots		Lot Sizes or Square Footages		Total Units or Square Footage		Avg. Density (du/acre or FAR)	
	Original	Revised	Original	Revised	Original	Revised	Original	Revised	Original	Revised
Bus Transfer Station	1.2	1.2	1	1						
Utilities	25.5	26.0	14	14						
Roads	138.3	134.1	48	43						
TOTAL	1,261.8	1,261.8	661	621			4,412 du 1,555,100 SF	4,055 du 1,555,100 SF		

Notes

* 4.4 acres previously identified as River are now included in the spineflower preserves.

The Interconnection Agreement sets conditions under which the first 6,000 dwelling units in Newhall Ranch may temporarily discharge wastewater to the Valencia WRP. The conditions include payment of the standard SCVSD connection fee (fair share of the cost of the existing infrastructure) and transfer of title of the 22-acre Newhall Ranch WRP site to the NRS. Newhall Ranch residents also would pay the SCVSD an annual service charge to cover the full cost of treating their wastewater at the Valencia WRP. Temporary treatment of wastewater at the Valencia WRP would not eliminate the need for the project applicant (Newhall) to construct the Newhall Ranch WRP. Prior to building more than 6,000 dwelling units, Newhall must construct the Newhall Ranch WRP to serve Newhall Ranch development and finance the new sewerage system. In addition, the Valencia WRP has the available capacity for temporary treatment of the Newhall Ranch wastewater (up to 6,000 dwelling units); thus, no negative impact to the CSD's sewerage system is expected.⁵

The Newhall Ranch Specific Plan Revised Draft EIR (March 1999) and the Revised Additional Analysis (May 2003) evaluated the environmental impacts related to development of the Specific Plan, including construction of the Newhall Ranch WRP to a project level and the new sewerage facilities at a programmatic level to serve the Specific Plan. The County is in the process of completing further CEQA compliance of the Newhall Ranch wastewater/sewer system at the project level for both Mission Village and Landmark Village in two pending project EIRs. Both the Mission Village Draft EIR and the Landmark Village Recirculated Draft EIR note that the environmental effects of constructing and operating the Newhall Ranch WRP at buildout were evaluated at the project-level in the prior certified Newhall Ranch Specific Plan environmental documentation. Both EIRs have identified options to treat wastewater generated by each project during the interim until the Newhall Ranch WRP is constructed. Specifically, both EIRs identified an option where wastewater would be pumped back to the existing Valencia WRP until such time as the first phase of the Newhall Ranch WRP is constructed. (See, e.g., Mission Village Draft EIR, Section 1.0, Project Description, pp. 1.0-69 through 1.0-70, and Section 4.9, Wastewater Disposal, pp. 4.9-10 through 4.9-12.)

As part of the project applicant's separate but related RMDP/SCP project, Newhall also has committed to constructing and operating, if needed, interim chloride reduction and demineralization facilities (proposed interim chloride facilities) to further treat Newhall Ranch project wastewater, until such time as the first phase of the Newhall Ranch WRP is constructed (i.e., up to 6,000 dwelling units per the terms of the 2002 Interconnection Agreement). The Newhall Ranch RMDP/SCP EIS/EIR, prepared jointly by

⁵ Moreover, the environmental implications of the build-out of the Valencia WRP to its capacity were assessed in the SCVSD's certified EIR for the 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan, which is incorporated by reference and available at http://www.lacsd.org/info/publications_n_reports/wastewater_reports/final2015scv/default.asp or upon request to SCVSD.

CDFG and the U.S. Army Corps of Engineers (Corps), evaluated the proposed interim chloride facilities at a program level, stating that the project EIRs for Mission Village and Landmark Village would evaluate such facilities at the project level. This project-level analysis is provided in this topical response.

C. Interim Chloride Reduction and Demineralization Facilities

In response to the County's request, and consistent with the joint Newhall Ranch RMDP/SCP EIS/EIR, the project applicant (Newhall) is to construct proposed interim chloride reduction facilities that would be used to reduce chloride levels of Newhall Ranch's first 6,000 dwelling units of project wastewater by treating it at the Valencia WRP. This treatment would occur until such time as the first phase of the Newhall Ranch WRP is constructed. This interim coordination effort among the project applicant, the County, and SCVSD is consistent with the terms of the 2002 Interconnection Agreement. The chloride reduction would ensure that, during the period project wastewater is treated at the Valencia WRP, approximately 1.6 million gallons per day (mgd) of effluent generated by the first 6,000 dwelling units within Newhall Ranch would be at concentrations below 100 milligrams per liter (mg/L) for chloride prior to discharge to the Santa Clara River.

The proposed interim chloride facilities would be comprised of (1) a 1.2-acre demineralization facility to be constructed adjacent to the existing Valencia WRP; (2) a 1.6-acre brine disposal well facility located within the Valencia Commerce Center, north of Castaic Creek; and (3) associated lines to and from the Valencia WRP to be constructed in existing road rights-of-way primarily within the project's utility corridor. **Figure F-1, Project Boundary**, depicts the location of the proposed interim chloride facilities relative to the Mission Village project boundary.

Purpose. The purpose of the proposed interim chloride facilities would be to initiate chloride treatment of the effluent amount originating from Newhall Ranch (up to 6,000 dwelling units) at the Valencia WRP during the operation period of the 2002 Interconnection Agreement. The result is that the project effluent discharged to the Santa Clara River through the permitted Valencia WRP outfall would result in discharge equivalent to 100 mg/L chloride (or other applicable standard), which is the chloride effluent treatment standard under the Newhall Ranch WRP National Pollutant Discharge Elimination System (NPDES) permit (NPDES No. CA0064556, Order No. R4-2007-0046). This additional treatment process would remove chloride from the Newhall Ranch effluent at the Valencia WRP, so that the interim chloride reduction would be equivalent to that of the Newhall Ranch WRP under the Newhall Ranch WRP Permit (100 mg/L).

Description of Operations. During the interim period, project effluent would be treated at the Valencia WRP and then piped to the proposed demineralization site adjacent to the Valencia WRP for chloride

reduction using reverse osmosis (RO) or an equivalent process. Once the treated effluent is demineralized, it would be piped back to the Valencia WRP, blended with other treated effluent, and made ready for discharge at concentrations below 100 mg/L.

The brine byproduct of the chloride reduction process would be piped within the project utility corridor north along The Old Road, west on Henry Mayo Drive, and north on Commerce Center Drive to the brine disposal well facility, which would be located in the Valencia Commerce Center, north of Castaic Creek. The piping north of the utility corridor along Commerce Center Drive also would be installed within existing road rights-of-way. The piping needed to transport effluent from the demineralization facility to the injection wells would be sized to the satisfaction of the SCVSD.

Based on the regional stratigraphy and geology, the target injection zone for the brine would be in the upper Miocene and lower Pliocene Towsley Formation. This target zone is situated significantly below the Underground Source of Drinking Water (USDW), which would ensure that the injected brine would not migrate upward into the USDW. The brine disposal requires separate permitting with the U.S. Environmental Protection Agency (USEPA), Region 9, and the project applicant (Newhall) has submitted a revised Class I non-hazardous Underground Injection Control (UIC) permit application to USEPA for two injection wells to be utilized for disposal of brine for both the proposed interim chloride facilities and the RO system, which is part of the approved and permitted Newhall Ranch WRP.

The demineralization and related brine disposal facilities would be constructed on developed land, disturbed land, and California annual grassland. The demineralization site would be located in an enclosure with a maximum height of 20 feet. Energy usage at this site is estimated at a connected load of 200 horsepower (hp) and a yearly use of 700,000 kilowatts per hour (kWhr) per year for the site. Emergency generators (500 kW) would be required for this facility. Construction would take approximately six months once the pad is in place. Construction equipment would likely consist of a backhoe for pipe installation and a crane for equipment installation.

At the brine disposal facility, it is estimated that the injection wells would require approximately 300 hp per day, but may occasionally run higher to accommodate some increased injection pressures to overcome well inefficiencies or other head losses. Emergency generators (500 kW) would be required for the brine injection system. There are no atmospheric emissions from the wellheads.

For both the belowground (well drilling and testing) and aboveground (station) facilities combined, construction is estimated to occur over 12-18 months. A drill rig plus support vehicles, staging area, and construction trailers would be needed for construction activities.

2.0 Environmental Analysis of the Revised Project

The Draft EIR, Section 4.0, Environmental Impact Analysis, determined that implementation of the original Mission Village project would result in significant unavoidable impacts relative to biota, visual qualities, construction noise, air quality, solid waste services, and agricultural resources.⁶ The Draft EIR also determined that the original project would result in potentially significant impacts to several other environmental categories although these impacts would be reduced to levels below significant with mitigation.

Based on considerations of avoiding or substantially lessening the significant impacts identified under the original project, as well as consideration of the basic objectives of the project, public comments received in response to the Notice of Preparation (NOP), discussions with County staff, the public, and other public agencies, the Draft EIR included an assessment of five alternatives to the original project: (1) No Project/No Development Alternative; (2) No Project/Future Development Alternative; (3) Expanded San Fernando Valley Spineflower Preserve Alternative; (4) 20 Percent Reduction in the Number of Dwelling Units Alternative; and (5) Cluster Alternative. Each of these alternatives is addressed in Draft EIR, Section 5.0, Project Alternatives. Of the alternatives considered, Alternative 3, the Expanded San Fernando Valley Spineflower Preserve Alternative, would be the environmentally superior alternative because this alternative would entail the least amount of development and, correspondingly, the least amount of developmental impacts. This alternative also is environmentally superior in that it would increase the amount of area used for spineflower preserves.

a. Potential Impacts

The purpose of this additional environmental analysis is to assess both the project's proposed revisions to the Mission Village VTTM, which, among other design features, reflects expanded preserves for the spineflower and a smaller development footprint consistent with the CDFG-approved Final SCP (2010); and the project's proposed interim chloride facilities that would be used to reduce chloride levels of Newhall Ranch project wastewater during the operation period of the 2002 Interconnection Agreement.⁷ This evaluation is conducted below on an environmental category-by-category basis. However, before

⁶ Subsequent analyses have determined that the potentially significant biota and noise impacts would be reduced to a level below significant with mitigation and, therefore, the Draft EIR determination of significant and unavoidable impacts has been revised as to these two impact categories. Please see Final EIR₇ (May 2011), "Revised Draft EIR Pages," revised sections **Section F4.3, Biota**, and **Section F4.6, Noise**.

⁷ Temporary treatment of wastewater at the Valencia WRP would not eliminate the need for the project applicant (Newhall) to construct the Newhall Ranch WRP. Consistent with the 2002 Interconnection Agreement, prior to building more than 6,000 dwelling units within Newhall Ranch, Newhall must construct the first phase of the Newhall Ranch WRP.

this specific environmental analysis is conducted, this topical response first evaluates the interim use of the Valencia WRP, taking into account overall environmental and cost considerations. After this overall analysis, found in Subsection a., below, the topical response addresses potential significant impacts by each environmental category in Subsection b., below.

A. Interim Use of the Valencia WRP and Overall Environmental and Cost Considerations

As background, the wastewater generated by the first 6,000 dwelling units of the Newhall Ranch Specific Plan would be treated on an interim basis by the SCVSD at the existing Valencia WRP pursuant to the terms of the Interconnection Agreement. This Agreement was entered into on January 9, 2002, between Newhall and the former Los Angeles County Sanitation District Nos. 26 and 32 (now known as the SCVSD). Pursuant to that Agreement, Newhall and SCVSD currently plan for this wastewater to be treated on an interim basis by the SCVSD at the Valencia WRP, which option was described in the Mission Village Draft EIR.

Comments have questioned Newhall's interim use of the WRP and have expressed a preference that the wastewater be treated at the outset at the Newhall Ranch WRP by the NRSD. Comments have expressed this preference because the Valencia WRP operates under less stringent discharge standards for chloride than the Newhall Ranch WRP, and because the Valencia WRP has received administrative notices of violation from the Regional Water Quality Control Board (RWQCB), stating that SCVSD is out of compliance with its NPDES permit requirements.

In reply to such comments, this topical response will: (a) provide background information regarding the chloride Total Maximum Daily Load (TMDL) governing the Upper Santa Clara River; (b) summarize SCVSD's WRP permitting and operations; (c) assess the Newhall Ranch Specific Plan's interim use of the Valencia WRP; (d) summarize existing chloride concentrations at the Valencia WRP; (e) address cost implications for the interim discharges to the Valencia WRP; and (f) provide a summary of SCVSD's response to the administrative notices of violation from the RWQCB.

Chloride TMDL Background. The RWQCB protects groundwater and surface water quality in the Los Angeles region, including the coastal watersheds of Los Angeles County and Ventura County, along with very small portions of Kern County and Santa Barbara County. The RWQCB adopted chloride objectives for individual reaches of the Santa Clara River as part as the Water Quality Control Plan for the Los Angeles Region (Basin Plan). The chloride objectives were established on what were assumed to be background water conditions at specific locations within the reaches and also protection of the off-stream agricultural beneficial use.

Under section 303(d) of the Clean Water Act, states are required to develop lists of waters that do not meet water quality standards even after point sources of pollution have installed the minimum required levels of pollution control technology. The law requires that states develop TMDLs for these impaired waters. High levels of chloride in the Santa Clara River have caused listings for impairment, and chloride TMDLs have been developed and adopted into the Basin Plan.

- The RWQCB first adopted a TMDL for chloride in the Upper Santa Clara River in October 2002 (Resolution No. 2002-018). On May 6, 2004, the RWQCB amended the Upper Santa Clara River chloride TMDL to revise the interim wasteload allocations (WLAs) and implementation schedule (Resolution 04-004). The amended TMDL was approved by the State Water Resources Control Board (SWRCB), Office of Administrative Law, and U.S. Environmental Protection Agency (USEPA), and became effective on May 4, 2005.⁸ The chloride TMDL requires that chloride levels in WRP effluent not exceed 100 mg/L. However, at the time the TMDL was adopted, there were key scientific uncertainties regarding the sensitivity of crops to chloride and the complex interactions between surface water and groundwater in the Upper Santa Clara River watershed. The TMDL recognized the possibility of revised chloride water quality objectives (WQO) and included mandatory reconsiderations by the RWQCB to consider Site Specific Objectives (SSO). The TMDL required the County Sanitation Districts to implement special studies and actions to reduce chloride loadings from the Saugus and Valencia WRPs. Please see the Mission Village Final EIR (October 2011), **Topical Response 5: Chloride**, for additional information regarding these studies.

The TMDL special studies were conducted in a facilitated process in which stakeholders participated in scoping and reviewing the studies. This process resulted in an alternative TMDL implementation plan that addresses chloride impairment of surface waters and degradation of groundwater. The alternative plan, known as the Alternative Water Resources Management (AWRM) Plan (also known as the Alternative Compliance Plan or ACP), was first set forth by the Upper Basin water purveyors and United Water Conservation District (UWCD), the management agency for groundwater resources in the Ventura County portions of the Upper Santa Clara River watershed. A GWSI model predicted that the ACP could achieve proposed conditional SSOs for chloride under both drought and non-drought conditions. Please see the Mission Village Final EIR (October 2011), **Topical Response 5: Chloride**, for additional information regarding the ACP.

⁸ The chloride TMDL was approved by the RWQCB, SWRCB, Office of Administrative Law, and USEPA, and became effective on April 6, 2010.

As noted in the 2010 Urban Water Management Plan (UWMP), as adopted by Castaic Lake Water Agency (CLWA) and Newhall County Water District (NCWD) on June 22, 2011, despite the anticipated success of the ACP:

“Due to ratepayer concerns regarding the perceived high cost of the AWRM Program, the recommended wastewater rate increases to implement AWRM were not approved by the SCVSD Board. In response, SCVSD and the retail water purveyors have been exploring alternative approaches that could result in revisions to the TMDL. These evaluations are ongoing.” (2010 UWMP, p. 4-11.)

The County acknowledges the regional efforts made by RWQCB, SCVSD, and other agencies in responding to chloride concentrations in the Santa Clara River; however, the County considers these regional efforts to be beyond the scope of the project-level EIR for the proposed Mission Village project. The reason that such issues are beyond the scope of Mission Village and the related EIR is because the selection of a wastewater treatment plant and the ability of that treatment plant to meet its obligations to discharge water in compliance with Section 402 of the federal Clean Water Act will be determined in an arena separate from the County's consideration of whether to approve the Mission Village project. Further, the legal framework under section 402 of the Clean Water Act ensures that the entities obligated to provide wastewater treatment (County sanitation districts) will be subject to whatever NPDES permit requirements are necessary to achieve compliance with federal law.

Newhall will meet its obligations under the Los Angeles County-approved Specific Plan to fund required public facilities, including interim wastewater treatment facilities as needed to serve the Newhall Ranch Specific Plan. Regulation under the Clean Water Act, section 402, will ensure that all wastewater generated by the Newhall Ranch Specific Plan will be treated by the County-created sanitation districts that operate publicly owned treatment works (POTWs) under NPDES permits, which are consistent with the Basin Plan and applicable effluent limitations. These NPDES permits protect water quality. Enforcement of the NPDES requirements is not governed by the County's local land use approval process.

Nonetheless, as shown below, the County has made a good-faith effort to respond to the chloride-related comments utilizing the best available information, even though several of the comments address these broader regional chloride reduction efforts underway in the Upper Santa Clara River watershed.

SCVSD's WRP Permitting and Operations. As stated above, comments questioned how the project applicant (Newhall) plans to achieve compliance with the Clean Water Act for the interim treatment of the wastewater from the first 6,000 dwelling units of the Newhall Ranch Specific Plan. In response, the legal obligation to comply with the chloride TMDL lies with the holder of the NPDES permits that

authorize surface water discharge to the Santa Clara River, which, in this case, is either SCVSD or NRSB. They are the County entities that operate the POTWs, and they are responsible for complying with the NPDES permits and other water quality requirements for the POTWs. If the RWQCB determines that a permit holder is not complying with its permit conditions, it can employ a variety of enforcement tools, including corrective orders and fines. This Clean Water Act section 402 NPDES regulatory process is different from the County's local land use approval process, and the treated effluent from the Newhall Ranch Specific Plan development is governed by independent actions of County-created sanitation districts operating under the separate Clean Water Act section 402 NPDES permit process.

In addition, as discussed below, the SCVSD has made progress, and is continuing to make progress, in improving the chloride water quality discharged to the Santa Clara River since the chloride TMDL was adopted. The SCVSD has proposed a revised ACP that, if approved by the RWQCB, would maintain the chloride water quality objectives of the chloride TMDL.

The SCVSD discharges tertiary-treated wastewater to the Santa Clara River from both the Valencia WRP and the Saugus WRP, pursuant to Order No. R4-2009-0074 and NPDES Permit No. CA0054216 (Valencia WRP) and Order No. R4-2009-0075 and NPDES Permit No. CA0054313 (Saugus WRP), which were adopted by the RWQCB. The Valencia NPDES permit authorizes SCVSD to discharge up to 21.6 mgd of tertiary-treated wastewater from the Valencia WRP. The Saugus NPDES permit authorizes SCVSD to discharge up to 6.5 mgd of tertiary-treated wastewater from the Saugus WRP. Both permits set forth waste discharge requirements, including effluent limits, and a monitoring and reporting program that apply to the discharges of effluent from each facility. This effluent contains chlorides that can degrade water quality and impact beneficial uses of water under the Porter-Cologne Water Quality Control Act (Cal. Water Code, Section 13000, *et seq.*).

Both the Valencia and Saugus WRPs are part of the SCVSD's regional system that receives wastewater from the City of Santa Clarita and unincorporated areas of Los Angeles County. For example, the Valencia WRP serves an estimated population of 162,661.⁹

The SCVSD completed a detailed and comprehensive study of the sources of chloride loading in the Santa Clarita Valley.¹⁰ Subsequently, the RWQCB and SCVSD staff analyzed chloride sources in the

⁹ Los Angeles RWQCB, 2009. Fact Sheet for Order No. R4-2009-0074 (NPDES No. CA0054216), Waste Discharge Requirements for the Santa Clarita Valley Sanitation District of Los Angeles County, Valencia WRP Discharge to Santa Clara River.

¹⁰ Sanitation Districts of Los Angeles County, *Santa Clarita Valley Joint Sewerage System Chloride Source Report*, October 2002.

Upper Santa Clara River watershed.¹¹ These analyses utilized mass balance techniques to identify and quantify chloride loads from imported water and residential, commercial, industrial, and WRP sources.

These reports found that the chloride in Valencia WRP effluent is comprised of two main sources: (1) chloride present in the potable water supply; and (2) chloride added by residents, businesses, and institutions in the Valencia WRP service area. Potable water in the Santa Clarita Valley is derived from two sources: imported water delivered under the State Water Project (SWP) and local groundwater. The chloride concentration in these two sources varies depending on a number of factors, most notably rainfall patterns. The chloride concentrations in Santa Clarita Valley water supplies that include SWP water are variable. Chloride concentrations in Santa Clarita Valley water supplies ranged from 52 mg/L to 85 mg/L from 2002 to 2010.¹²

As to the chloride added by users, this load can be further divided into two parts: brine discharge from self-regenerating water softeners (SRWS) and all other loads added by users. Excluding chloride concentration in the water supply, non-SRWS sources of chloride include residential, commercial, industrial, infiltration, and wastewater disinfection. Based on the SCVSD's 2002 chloride source study, once this water was delivered to homes and businesses for interior use, the use of SRWS added an additional 78 mg/L of chloride concentration to the water supply before it was disposed of in the sewer for treatment. This high chloride addition suggested that source controls could be a significant means for improving water quality in the Santa Clara River.

Based upon the results of the 2002 study, the SCVSD adopted an ordinance prohibiting the installation and use of new SRWS in 2003. Further, SCVSD implemented Automatic Softener Rebate Programs in 2005 (Phase I) and 2007 (Phase II), followed by the 2009 Ordinance that required removal and disposal of all SRWS installed in the SCVSD's service area. These efforts have resulted in significant reduction of chloride generated by SRWS. Based on the SCVSD's "2010 Chloride Source Identification/Reduction, Pollution Prevention, and Public Outreach Plan," (November 2010), concentration of chloride produced by SRWS was 6 mg/L in the SCVSD final effluent in the first half of 2010. SCVSD's goal is to completely eliminate SRWS from the SCVSD's service area.

¹¹ Los Angeles RWQCB, 2008. Upper Santa Clara River Chloride TMDL Reconsideration, Conditional Site Specific Objectives for Chloride, and Interim Wasteload Allocations for Sulfate and Total Dissolved Solids Staff Report. November 24, 2008.

¹² Sanitation Districts of Los Angeles County, 2010 Chloride Source Identification/Reduction, Pollution Prevention, and Public Outreach Plan, November 2010, Table 3.9-2, p. 3-21.

Recently, however, Ventura County, Ventura County Agricultural Water Quality Coalition, and UWCD have expressed concerns to the RWQCB over a perceived lack of progress by the SCVSD for compliance with the chloride TMDL. The SCVSD has responded to those claims by letter to the RWQCB, dated May 9, 2011. A summary of the SCVSD's May 9, 2011 letter to the RWQCB, which provides responsive information concerning the SCVSD's compliance with the chloride TMDL and sets forth the SCVSD's progress to date since the chloride TMDL was adopted, is provided in the Mission Village Final EIR (October 2011), **Topical Response 5: Chloride**. The letter includes estimates and time frames for completion of the work necessary in devising a revised ACP; these efforts are ongoing. The RWQCB, nonetheless, has issued administrative notices of violation to SCVSD, contending that SCVSD is out of compliance with the requirements established by the adopted NPDES permits by not completing certain scheduled tasks specified in Attachment K to the permits. Both SCVSD and RWQCB have engaged in discussions to resolve the permit compliance issues, and those discussions are ongoing. Additional information regarding SCVSD's response to the RWQCB notices of violation is provided below.

SCVSD's Response to the Administrative Notices of Violation. The RWQCB has issued administrative notices of violation to SCVSD, focusing on the violation regarding the Valencia WRP. In response, as of May 27, 2011, the Los Angeles RWQCB issued administrative notices of violation to SCVSD regarding the Valencia and Saugus WRPs. The RWQCB notified SCVSD by letter that it was out of compliance with the requirements established in Order Nos. R4-2009-0074, R4-2009-0075 for not completing Task 17(a) in Attachment K of the Orders. Task 17(a) requires completion of the Wastewater Facilities Plan and programmatic EIR for facilities to comply with final permit effluent limits for chloride. RWQCB's letters stated that the SCVSD was to respond in writing by June 27, 2011.

On June 27, 2011, the SCVSD responded to the RWQCB. In the response, the SCVSD committed to completing Task 17(a) of the Upper Santa Clara River Chloride TMDL implementation schedule by recommending to its Board of Directors at the next regularly scheduled Board meeting that staff prepare a Wastewater Facilities Plan and EIR for facilities to comply with a final effluent chloride limit of 100 mg/L at the point of discharge and begin design of the facilities. On July 26, 2011, the SCVSD Board of Directors approved the staff recommendation authorizing preparation of the Wastewater Facilities Plan, EIR, and design of such facilities as it relates to compliance with the final effluent chloride objective of 100 mg/L at the Saugus and Valencia WRPs.

As part of the Wastewater Facilities Plan and EIR, SCVSD also intends to address an alternative compliance approach that responds to changed chloride conditions as of 2011, which would fully protect all designated beneficial uses in the Santa Clara River watershed. The SCVSD believes that these changed conditions will show that it is more environmentally and economically sound to implement an alternative compliance approach, rather than an advanced treatment approach, in meeting a 100 mg/L final effluent

limit. As part of this effort, the SCVSD also intends to perform the modeling and scientific and technical studies necessary to demonstrate the adequacy of its alternative compliance approach and to request reopening of the chloride TMDL at a later time based on the modeling in those studies.

In addition, the SCVSD contends that it has not violated California law (Water Code, section 13383) in failing to complete Task 17(a) in Attachment K of the Orders as asserted by RWQCB in the letter notices of violation. Nonetheless, the SCVSD's Board of Directors has committed to initiate efforts to complete a Wastewater Facilities Plan and EIR to comply with a final effluent chloride limit of 100 mg/L, and to begin design of such facilities. The SCVSD also estimates that it will complete the Wastewater Facilities Plan and EIR by December 31, 2012.

The Specific Plan's Interim Use of the Valencia WRP. At buildout, the Newhall Ranch Specific Plan was designed to send its wastewater to the Newhall Ranch WRP. However, Newhall and the Sanitation Districts Nos. 26 and 32 (later consolidated as the SCVSD) entered into an Interconnection Agreement, dated January 9, 2002, which sets conditions under which the first 6,000 dwelling units within the Specific Plan area may temporarily discharge wastewater (up to 1.6 mgd) to SCVSD's Valencia WRP. Newhall remains obligated to fund and construct the Newhall Ranch WRP for ultimate buildout of the Specific Plan. However, practical, technical, and economic reasons support this phasing for wastewater treatment, in coordination with the SCVSD.

From an environmental perspective, the Sanitation Districts Nos. 26 and 32 approved the Interconnection Agreement in duly noticed public meetings, and it has been referenced in subsequent official documents, including Los Angeles County and LAFCO resolutions supporting formation of the NRSD. Most recently, the County's January 2011 Resolution confirmed the formation of the NRSD. In doing so, the County's Board of Supervisors found that formation of the NRSD was within the scope of the previously certified 1999/2003 Newhall Ranch EIR, as well as the Addendum certified by the Board on December 13, 2005. The Board specifically referenced the Interconnection Agreement as allowing wastewater for up to 6,000 dwelling units to be treated at the existing Valencia WRP as needed prior to construction of the Newhall Ranch WRP. The Board further found that the SCVSD had sufficient capacity to accommodate the interim use of its facilities.

Moreover, the cost and environmental ramifications associated with the Valencia WRP's temporary treatment of wastewater generated by the first 6,000 dwelling units constructed within the Specific Plan area were addressed by the SCVSD's detailed memorandum, dated March 8, 2011, regarding this subject. As provided in that memorandum, the "Newhall Ranch wastewater ... would neither add to nor alleviate the SCVSD's financial burden to comply with the Chloride TMDL." (Memorandum, p. 2.)

As stated in the SCVSD's March 8, 2011 memorandum, the temporary use of the Valencia WRP for treatment of Newhall Ranch wastewater does not eliminate the Specific Plan requirement for the project applicant (Newhall) to construct the Newhall Ranch WRP and to finance the new sewerage system within the Specific Plan area. According to the memorandum, the developer (Newhall) must construct the Newhall Ranch WRP per the Specific Plan, and must have it operating properly before the next phase after Mission Village and Landmark Village (up to 6,000 dwelling units).¹³

Summary of Existing Chloride Concentrations at the Valencia WRP. Based on the best available information from SCVSD: (a) under the NPDES permits for the Valencia and Saugus WRPs, SCVSD is the entity responsible for compliance with the chloride TMDL, not the project applicant (Newhall); and (b) as explained below, the existing Santa Clarita Valley communities and Newhall Ranch are expected to produce similar chloride concentrations due to use and similar overall wastewater chloride concentrations, and since final compliance will be determined by concentration, the addition of Newhall Ranch wastewater to the Valencia WRP would neither add to nor alleviate the SCVSD's burden to comply with the chloride TMDL.

Based on the best available information, the SCVSD has completed a detailed and comprehensive study of the sources of chloride loading in the Santa Clarita Valley.¹⁴ Subsequently, the RWOCB and County Sanitation Districts staff analyzed chloride sources in the Upper Santa Clara River watershed.¹⁵ These analyses utilized mass balance techniques to identify and quantify chloride loads from imported water and residential, commercial, industrial, and WRP sources.

The Newhall Ranch Mission Village and Landmark Village projects are expected to produce wastewater chloride concentrations similar to those in the existing SCVSD service area. The Mission Village and Landmark Village projects will not use SWP water, but will be supplied with local groundwater from the Alluvial aquifer with an average chloride concentration of 82 mg/L (concentrations ranging from 74 to 96

¹³ Please refer to SCVSD's March 8, 2011 memorandum for additional responsive and relevant information on this subject, which is incorporated by reference and available for public review upon request to the County's Department of Regional Planning.

¹⁴ Sanitation Districts of Los Angeles County, *Santa Clarita Valley Joint Sewerage System Chloride Source Report*, October 2002. The year 2001 was used as a basis for the study.

¹⁵ Los Angeles RWOCB, 2008. Upper Santa Clara River Chloride TMDL Reconsideration, Conditional Site Specific Objectives for Chloride, and Interim Wasteload Allocations for Sulfate and Total Dissolved Solids Staff Report. November 24, 2008.

mg/L have been measured in E Wells),¹⁶ similar to the chloride concentrations in Santa Clarita Valley water supplies from 2002 to 2010.

As described in the Mission Village EIR, Section 4.8, Water Service, the project potable water demand would be met by the Valencia Water Company through the use of Newhall's rights to 7,038 acre-feet per year (afy) of groundwater from the Alluvial aquifer, which is presently used by Newhall for agricultural irrigation. In addition, due to project conditions, the amount of groundwater that will be used to meet the potable demands of the Newhall Ranch Specific Plan, including the Mission Village and Landmark Village projects, cannot exceed the amount of water historically and presently used by Newhall for agricultural uses. Therefore, no net increase in groundwater use will occur with implementation of this project pursuant to the Specific Plan.

If the Newhall Ranch WRP is not operating at the time of Mission Village and Landmark Village project occupancy, their non-potable water demand would be met through the use of recycled water from the Valencia WRP. Accordingly, the two proposed projects' water demand would be met by relying on two primary sources of water supply, namely, Newhall's agricultural water supplies and recycled water supplied by the Newhall Ranch WRP or the existing Valencia WRP. Because these two independent water sources meet the water needs of the proposed project, no potable water would be needed from the existing or planned water supplies of CLWA, including imported water from CLWA's SWP supplies.

Furthermore, Newhall is conditioned to prohibit "self-regenerating water softeners" in Newhall Ranch and SCVSD staff will recommend that the newly formed NRSD enact a ban similar to the water softener ban in Santa Clarita Valley. Thus, this significant source of chloride will not be present in the wastewater from the Mission Village and Landmark Village projects.

As shown in the Mission Village Final EIR, residential land uses will generate about 73 percent of the total wastewater generated and commercial land uses would generate the remaining 27 percent.¹⁷ Based on the chloride concentrations identified in the 2010 Chloride Source Identification/Reduction, Pollution Prevention, and Public Outreach Plan, the overall chloride concentration in the Mission Village and Landmark Village wastewater can be calculated as: (percent residential wastewater generated multiplied by residential concentration) + (percent commercial wastewater generation multiplied by commercial concentration) = total chloride concentration. The average chloride concentration in the Mission Village project's groundwater supply is approximately 82 mg/L,¹⁸ the non-SRWS residential chloride

¹⁶ Mission Village Draft EIR, Appendix 4.8 and Appendix 4.10.

¹⁷ See, Mission Village Final EIR (May 2011), **Section 4.9, Table 4.9-1, Mission Village Wastewater Generation.**

¹⁸ Mission Village Draft EIR, Appendix 4.8 and Appendix 4.10.

concentration is 31 mg/L above water supply concentration, and the commercial concentration accounts for 33 mg/L above the water supply concentration.¹⁹ Given these parameters, the concentration of chloride in the Mission Village and Landmark Village interim wastewater discharges to the Valencia WRP would be about 113 mg/L.²⁰ After consideration of the chloride concentration attributable to disinfection practices at the Valencia WRP (12 mg/L),²¹ the Valencia WRP effluent concentration of chloride treated Mission Village and Landmark Village wastewater would be approximately 125 mg/L.

In comparison, the average Valencia WRP effluent chloride concentration from 2000 through 2010 was 159 mg/L, with a maximum of 195 mg/L in 2003 and minimum of 128 mg/L in 2010.²² Thus, the interim discharge of wastewater from the Valencia WRP due to the Mission Village and Landmark Village projects' wastewater would have similar chloride concentrations (assuming complete elimination of SRWS from SCVSD's service area), or would lower chloride concentrations in discharges from the Valencia WRP (if SRWS are not completely eliminated).

Thus, the interim discharge of wastewater from the Valencia WRP due to the Mission Village and Landmark Village projects' wastewater would have a less than significant impact on chloride in the Santa Clara River, because: (a) the discharge of wastewater from the Valencia WRP has been demonstrated to be similar as between the Mission Village and Landmark Village projects' wastewater and the wastewater from existing Santa Clarita Valley communities; (b) the use of the Valencia WRP for treatment of Mission Village and Landmark Village wastewater (i.e., first 6,000 dwelling units) would be temporary until construction of the first phase of the Newhall Ranch WRP; and (c) the Valencia WRP has sufficient capacity to accommodate the interim wastewater discharge from the first 6,000 dwelling units from Newhall Ranch's Mission Village and Landmark Village projects (see below).

The Interconnection Agreement between SCVSD and Newhall allows for interim wastewater discharges from up to 6,000 dwelling units from the Newhall Ranch projects, which is equivalent to about 1.6 million gallons per day (mgd). Mission Village is projected to produce about 1 mgd and Landmark Village is projected to produce about 0.3 mgd, for a total of approximately 1.3 mgd, in the interim period before the first phase of the Newhall Ranch WRP is built. The Valencia WRP treated approximately 15 mgd in 2010

¹⁹ Sanitation Districts of Los Angeles County, 2010 Chloride Source Identification/Reduction, Pollution Prevention, and Public Outreach Plan, November 2010, pg. 3-14.

²⁰ $[0.76*(82+31)] + [0.24*(82+33)] = 113.0$ mg/L chloride.

²¹ Sanitation Districts of Los Angeles County, 2010 Chloride Source Identification/Reduction, Pollution Prevention, and Public Outreach Plan, November 2010, Table 3.9-2, pg. 3-21.

²² Data provided by SCVSD.

and currently has a capacity of 21.6 mgd (yielding 6.6 mgd of surplus capacity).²³ Thus, the Valencia WRP has sufficient capacity to accommodate the interim processing of up to 1.6 mgd as outlined in the Interconnection Agreement.

The design capacity and expectations for future expansion are based on studies of regional growth conducted by the SCVSD. Connection permits are only issued if there is sufficient collection and treatment capacity. The SCVSD²⁴ routinely monitors system capacity and anticipated development to ensure sufficient capacity for approved developments. According to recent SCVSD flow projections based on Southern California Association of Governments (SCAG) Regional Transportation Plan, 2008, the previously approved Stage VI expansion at the Valencia WRP is not expected to be needed until approximately 2021 and the site buildout capacity of 34.2 mgd is not expected to be reached until approximately 2033.²⁵ However, because Mission Village and Landmark Village wastewater will ultimately be treated at the Newhall Ranch WRP, the project is expected to have a less than significant impact on future expansion of SCVSD facilities.

The Valencia WRP currently delivers approximately 400 acre-feet per year of recycled water to the Valencia Water Company that is used by its customers for irrigation of the Westridge Golf Course, and slopes and parkway medians. The Mission Village and Landmark Village projects will also utilize recycled water from the Valencia WRP for landscape irrigation until the Newhall Ranch WRP is operational. The combined Mission Village and Landmark Village projects recycled water demand is projected to be 1,579 afy, in comparison to the combined wastewater generation rate of 1,456 afy (1.3 mgd), a surplus demand of approximately 123 afy. The use of Valencia WRP effluent for irrigation will reduce the amount of groundwater pumping required for water supply in addition to reducing the quantity of Valencia WRP discharges to the Santa Clara River.

Cost Implications for Interim Discharges to the Valencia WRP. Comments have questioned the costs of water infrastructure and the wastewater treatment process. While it is correct that the project applicant (Newhall) will fund these required services, the Mission Village EIR is not the forum for addressing such costs. The provision for the funding of these services does not itself create the prospect of a physical change to the environment and, therefore, is not an effect on the environment requiring analysis under

²³ See, e.g., Comment letter on the Mission Village (TTM 061105) Draft EIR from the County Sanitation Districts of Los Angeles County, dated November 17, 2010.

²⁴ SCVSD is a member of the Sanitation Districts and is the wastewater service provider for the City of Santa Clarita and some surrounding unincorporated county areas. SCVSD operates the Valencia WRP.

²⁵ Comment letter on the Mission Village (TTM 061105) Draft EIR from the County Sanitation Districts of Los Angeles County, dated November 17, 2010.

CEQA; consequently, this information is not required under CEQA. However, responsive information is provided below.

When operating at flows equal to or below the permitted plant capacity, compliance with the chloride TMDL will depend on the chloride concentration in the treatment plant effluent. Local groundwater is the planned potable water source for the Specific Plan's Mission and Landmark Villages, the two developments whose wastewater would be temporarily treated at SCVSD's Valencia WRP under the Interconnection Agreement. The groundwater chloride levels for these two communities are similar to that of the groundwater used by existing Santa Clarita Valley communities. Thus, no difference in chloride concentration is expected due to the water supply.

In addition, like the Santa Clarita Valley, Mission Village and Landmark Village will be a mixture of residential and commercial land uses with some industry. Historically, the use of "self-regenerating water softeners," or SRWSs, in the Santa Clarita Valley was a significant chloride source for SCVSD wastewater prior to the ban on SRWS. Since the ban, a significant portion of the SRWS have been removed resulting in a marked drop in chloride levels in the wastewater. SCVSD intends to continue enforcement/removal efforts until essentially all SRWS are removed. Pursuant to Specific Plan Mitigation Measure 5.0-52, Newhall must request that NRSD also ban SRWS within the Newhall Ranch Specific Plan area. SCVSD's staff has confirmed that they will recommend that the NRSD enact a SRWS ban similar to the ban adopted in the SCVSD service area. Consequently, the Mission Village and Landmark Village communities are expected to produce similar overall wastewater chloride concentrations to the chloride concentrations in wastewater from the Santa Clarita Valley. Since final compliance will be determined by concentration, the addition of Newhall Ranch wastewater to the Valencia WRP would not impact the SCVSD's compliance with the chloride TMDL, nor add to the SCVSD's financial burden or cost to comply with the chloride TMDL.

Temporary use of SCVSD's Valencia WRP for treatment of Mission Village and Landmark Village wastewater also does not eliminate the requirement for Newhall or its designee to construct the Newhall Ranch WRP or to finance the new sewerage system within the Specific Plan area. Newhall must construct the Newhall Ranch WRP and have it operational before constructing the next phase after Mission Village and Landmark Village (up to 6,000 dwelling units). Temporary treatment of Mission Village and Landmark Village wastewater at SCVSD's Valencia WRP is a practical engineering decision based on the need to build up an adequate steady flow of wastewater before starting up the Newhall Ranch WRP.

In addition, and as explained in this response, to confirm full and complete compliance with the chloride TMDL, Newhall has identified interim chloride reduction treatment at the Valencia WRP. This involves chloride treatment of the effluent amount originating from Newhall Ranch (up to 6,000 dwelling units) at

the Valencia WRP during the operation period of the 2002 Interconnection Agreement. The result is that the project effluent discharged to the Santa Clara River through the permitted Valencia WRP outfall would result in discharge equivalent to 100 mg/L chloride (or other applicable standard), which is the chloride effluent treatment standard under the Newhall Ranch WRP NPDES permit (NPDES No. CA0064556, Order No. R4-2007-0046). This additional treatment process would remove chloride from the Newhall Ranch effluent at the Valencia WRP, so that the interim chloride reduction would be equivalent to that of the Newhall Ranch WRP under the Newhall Ranch WRP Permit (100 mg/L).

B. Potential Significant Environmental Impacts

The following discussion evaluates and compares the potential significant environmental impacts of the original project with the impacts of the revised project by environmental topic category. The project assessed in the Mission Village EIR is referred to below as the “original project.” The “revised project” comprises the refinements made to the Mission Village revised VTTM and the interim chloride reduction facilities that would further treat the wastewater from Mission Village and Landmark Village, if needed, until such time as the first phase of the Newhall Ranch WRP is constructed.

(1) Geotechnical and Soil Resources

Implementation of the revised project would result in less grading because of the reduced development footprint on the Mission Village tract map site (graded acres would decrease by approximately 21.6 acres). A revised soils report has been prepared for the revised project, a copy of which is presented in Final EIR (May 2011) Appendix F4.1. As depicted in the report, grading associated with the original project had a total earthwork volume of 29.9 million cubic yards (MCY). In comparison, grading associated with the revised project would total 28.9 MCY; the difference is a reduction of 1 MCY due to the reduction in the development footprint. As to potential impacts, all improvements constructed on site as part of the revised project would be subjected to the forces of ground movement during seismic events similar to the original project, and would also be subject to the same construction requirements as the original project.

As to the interim chloride reduction facilities, most of the construction activities affecting geology/soils would occur within the existing road rights-of-way in the project’s utility corridor. The environmental effects of constructing the proposed utility corridor were addressed in the Mission Village Draft EIR, Section 4.0, Environmental Impacts Analysis. Given the very close proximity of the demineralization and brine disposal sites to the Mission Village project site, the geology and soils within both the demineralization and brine disposal sites are expected to be similar to the geology and soils in the immediate vicinity of the Mission Village project site, which was analyzed in the Draft EIR, Section 4.1,

Geotechnical and Soil Resources. The revised project, including the demineralization and brine disposal sites, also would be subject to the same mitigation measures (as applicable) as found in the Draft EIR, Section 4.1.

Nonetheless, because there would be fewer developed acres under the revised project than under the original project, and because the same mitigation in the EIR, Section 4.1, would apply to the revised project, geotechnical hazards would be reduced and, therefore, the revised project would result in fewer impacts than the original project with respect to geology and soils, and no new or more severe significant geological/geotechnical effects are expected to occur with implementation of the revised project.

(2) Hydrology

Implementation of the revised project would result in slightly less stormwater runoff and more infiltration than the original project because less area would be developed resulting in less impervious area and more open area. Also, it is likely the landscape irrigation needs of the revised project would be less than the original project due to less landscaped acreage. The urban runoff that is generated under the revised project would be conveyed and discharged into the Santa Clara River in a similar manner as the original project.

As to the interim chloride reduction facilities, most of the construction activities would occur within the existing road rights-of-way in the project's utility corridor. The environmental effects of constructing the proposed utility corridor were addressed in the Mission Village Draft EIR, Section 4.0, Environmental Impacts Analysis. The demineralization and brine disposal sites are relatively minor in size (1.2 and 1.6 acres, respectively), and would be designed to allow surface water to sheet flow from the two sites. The hydrology within both sites is expected to be similar to the hydrology requirements within the immediate vicinity of the Mission Village project site, which was analyzed in the Draft EIR, Section 4.2, Hydrology. The revised project, including the demineralization and brine disposal sites, also would be subject to the same mitigation measures (as applicable) found in the Draft EIR, Section 4.2.

Because there would be fewer developed acres under the revised project than under the proposed project, and because the same mitigation in the EIR, Section 4.2, would apply to the revised project, due to the reduced runoff, the revised project would result in fewer impacts from a hydrology perspective than the original project; and no new or more severe significant hydrology effects are expected to occur with implementation of the revised project.

(3) Water Quality

Under the original project or revised project, Project Design Features (PDFs) incorporated into the development to address water quality and hydrologic impacts would include site design, source control, treatment control, and hydromodification control Best Management Practices (BMPs). In addition, flow control BMPs would be incorporated into the PDFs to comply with the Los Angeles Countywide Standard Urban Storm Water Mitigation Plan (SUSMP).

In addition, Low Impact Development (LID) BMPs would be implemented as part of a LID BMP Implementation Plan that would retain runoff from the 0.75-inch water quality design storm. This LID BMP Implementation Plan will be conceptually similar to LID requirements in the recently adopted Ventura County MS4 Permit. On-site surface run-off would be intercepted in retention and/or biofiltration BMPs to the extent feasible, and excess runoff would be conveyed to a network of storm drains that lead to a series of regional infiltration/biofiltration facilities prior to discharge into the Santa Clara River.

Because the revised project would result in slightly less stormwater runoff than the original project (see Hydrology above), the revised project would result in fewer impacts than the original project from a water quality perspective. However, the recommended mitigation measures contained in the Draft EIR would reduce such impacts to less than significant under either scenario. For additional information regarding the water quality impacts of the revised project, please see **Topical Response 5: Water Quality** and Final EIR Section F4.22, Water Quality.

As to the interim chloride reduction facilities, most of the construction activities would occur within the existing road rights-of-way in the project's utility corridor. The environmental effects of constructing the proposed utility corridor were addressed in the Mission Village Draft EIR, Section 4.0, Environmental Impacts Analysis. The demineralization and brine disposal sites would be subject to the same water quality analysis and mitigation for the overall Mission Village project site. The water quality analysis was undertaken in the Mission Village Draft EIR, Section 4.22, Water Quality. The revised project, including the demineralization and brine disposal sites, also would be subject to the same mitigation measures (as applicable) found in the Draft EIR, Section 4.22.

The brine by-product injected into the wells situated on the brine disposal site would be subject to a Class I injection well permit, which is under consideration as part of USEPA's UIC program. No groundwater quality impacts are expected from the brine by-product injected into the wells because the target injection zone is well below the projected underground source of drinking water, or USDW. The placement of the

target injection zone would ensure that the injected brine by-product would not migrate upward into the USDW, thereby eliminating any significant impact to groundwater or its quality.

Thus, no new or more severe significant water quality effects are expected to occur with implementation of the revised project, because: (1) there would be fewer developed acres under the revised project than under the proposed project; (2) the same mitigation in the Draft EIR, Section 4.22, would apply to the revised project; (3) no significant groundwater quality impacts are expected from the injected brine by-product associated within the interim chloride reduction facilities due to the deep target injection zones; and (4) the brine by-product would be separately regulated pursuant to USEPA's UIC program, and thereby afford sufficient protection to the USDW due to the design, testing, and monitoring that would be provided as permit conditions under USEPA's UIC program.²⁶

(4) Biota

The potential significant impacts to biological resources under the original project as compared to the revised project are addressed below, with direct, indirect and unavoidable significant impacts addressed separately. The analysis provided below includes changes to biological resources as a result of both the revised setback from the Santa Clara River per the Mission Village revised VTTM, and the proposed interim chloride reduction facilities. Plant communities are depicted in **Figure F-4, Plant Communities at the Revised Mission Village Project Site**, and **Figure F-2, Additional Spineflower Preserves at the Revised Mission Village Project Site**.

(a) Direct Impacts

Plant Communities and Land Covers: Compared to the original project, the revised project would reduce permanent impacts to existing vegetation and land covers by 218.8 acres (1,153.4 acres to 1,134.6 acres (or approximately 0.21.6 percent)). This decrease would be primarily within the upland vegetation communities. The reduction in permanent impacts under the revised project represents a decrease of 4.0 acre for California annual grassland, 16.2 acres for California sagebrush scrub, (379.1 acres reduced to 362.9 acres), 2.2 acres for California sagebrush – California buckwheat scrub, (73.2 acres reduced to 71.0 acres), 1.65 acres for Valley oak/grass, and (1.9 acres reduced to 0.74 acre), 0.5 acre of disturbed land- (225.2 acres reduced to 224.7 acres), and an increase of 1.6 acres for California annual grassland (53.3 acres to 54.9 acres). Temporary impacts associated with implementation of the expanded spineflower preserves would increase by 3.48 acres (339.7 acres (to 343.5 acres or approximately 0.01 percent) overall with the

²⁶ Newhall's revised USEPA Class I Injection Well Application, dated June 30, 2011, is incorporated by reference and is available for public review upon request to the County's Department of Regional Planning.

revised project, although these temporary impacts would be for upland vegetation communities. The temporary impacts for the revised project would include increases of 0.2 acre for Valley oak/grass- (~~0.30 acre to 0.2 acre~~), 0.4 acre for California annual grassland- (~~12.8 acres to 13.2 acres~~), 1.4 acres for California sagebrush scrub- (~~34.3 acres to 35.7 acres~~), 0.8 acre for California sagebrush – California buckwheat scrub- (~~10.0 acres to 10.8 acres~~), and 0.48 acre of disturbed land- (~~169.1 acres to 169.9 acres~~).

Table TR4-2, Plant Community/Land Use Impact Summary, provides a detailed summary of the potential impacts to vegetation communities under the original project analyzed in the Draft EIR (see Draft EIR Table 4.3-8), as compared to the impacts to vegetation communities resulting from the revised project. **Figure F-4, Plant Communities at the Revised Mission Village Project Site**, depicts the plant communities at the project site.

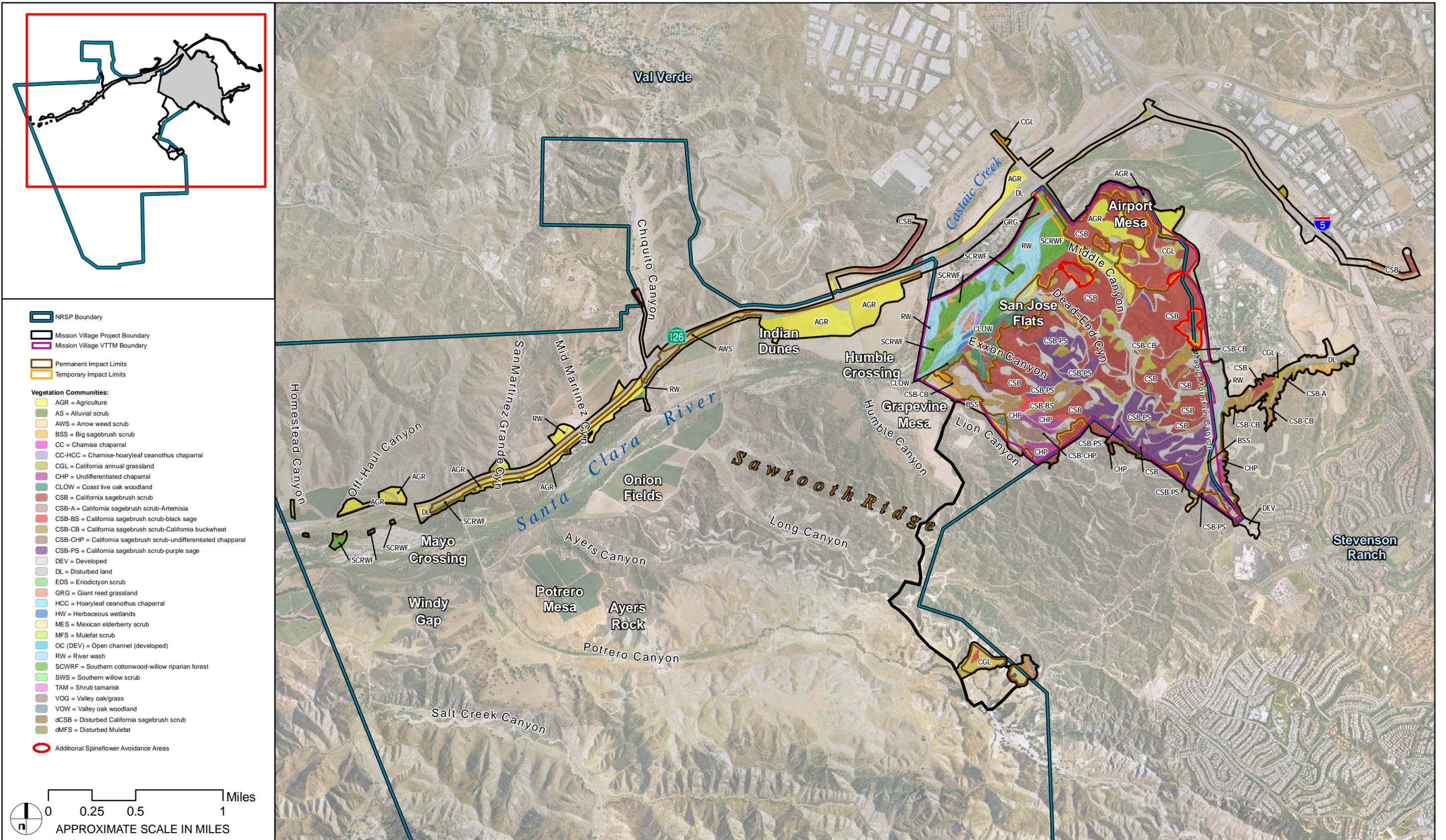


IMAGE SOURCE: DigitalGlobe 2007

FIGURE F-4

Plant Communities and Land Uses at the Revised Mission Village Project Site

Table TR4-2
Plant Community/Land Use Impact Summary

General Physiognomic and Physical Location	General Habitat Type	Floristic Alliance	Association	Total Acres Present	Acres Developed	Acres Developed (Reduced footprint Scenario)	Acres Temporarily Disturbed ¹	Acres Temporarily Disturbed ¹ (Reduced Footprint Scenario)	Total Acres Developed or Disturbed	Total Acres Developed or Disturbed (Reduced Footprint Scenario)	Percent Acres Developed or Disturbed	Percent Acres Developed or Disturbed (Reduced Footprint Scenario)
Grass and Herb Dominated Communities (40.000.00)	Non-Native Grassland (42.000.00)	California annual grassland (42.040.00)	Not mapped to association level	82.485.1	53.3	52.354.9	12.8	13.4 2	66.1	65.468.1	80 78%	80%
Scrub and Chaparral (30.000.00)	Coastal Scrub (32.000.00)	California sagebrush scrub (32.010.00)	Not mapped to association level	517.2	379.1	362.9	34.3	35.7	413.4	398.6	80%	77%
		California sagebrush- <i>Artemesia</i> (32.010.01)		16.1	14.8	14.8	1.3	1.3	16.1	16.1	100%	100%
		California sagebrush-purple sage (32.010.04)		132.9	124.7	124.7	2.2	2.2	127.0	127.0	96%	96%
		California sagebrush-black sage scrub (32.120.00)	California sagebrush-black sage (32.120.01)	12.9	11.9	11.9	1.1	1.1	12.9	12.9	100%	100%
		California sagebrush-California buckwheat scrub (32.110.00)	Not mapped to association level	84.7	73.2	71.0	10.0	10.8	83.2	81.8	98%	97%
		California Sagebrush - Undifferentiated Chaparral (32.300.00)	Not mapped to association level	15.5	12.6	12.6	1.3	1.3	13.9	13.9	90%	90%
		Disturbed California sagebrush scrub	Not mapped to association level	0.1	0	0	0.1	0.1	0.1	0.1	100%	100%
		Undifferentiated Chaparral Scrubs (37.000.00)	Not mapped to alliance level	Not mapped to association level	35.9	31.3	31.3	3.0	3.0	34.3	34.3	96%

General Physiognomic and Physical Location	General Habitat Type	Floristic Alliance	Association	Total Acres Present	Acres Developed	Acres Developed (Reduced footprint Scenario)	Acres Temporarily Disturbed ¹	Acres Temporarily Disturbed ¹ (Reduced Footprint Scenario)	Total Acres Developed or Disturbed	Total Acres Developed or Disturbed (Reduced Footprint Scenario)	Percent Acres Developed or Disturbed	Percent Acres Developed or Disturbed (Reduced Footprint Scenario)
	Chamise with Chaparral (37.100.00)	Chamise Chaparral (37.101.00)	Not mapped to association level	2.6	2.5	2.5	0.1	0.1	2.6	2.6	100%	100%
		Chamise-hoaryleaf ceanothus chaparral (37.107.00)	Not mapped to association level	1.8	1.5	1.5	0.4	0.4	1.8	1.8	100%	100%
	Other Scrubs	Eriodictyon Scrub	Not mapped to association level	0.6	0.6	0.6	0	0	0.6	0.6	100%	100%
Broad Leafed Upland Tree Dominated (70.000.00)	Oak Woodland and Forest (71.000.00)	Coast live oak forest and woodland (71.060.00)	Coast live oak woodland (71.060.19)	31.7	4.4	4.4	3.4	3.4	7.8	7.8	25%	25%
		Valley oak forest and woodland (71.040.00)	Valley oak woodland (71.040.08)	2.3	0	0	0	0	0	0	0%	0%
			Valley oak/grass (71.040.05)	3.3	1.9	0.4	0	0.2	1.9	0.6	58%	17%
Riparian and Bottomland Habitat (60.000.00)	Other Riparian/Wetland	Herbaceous wetland	Not mapped to association level	4.0	0.4	0.4	1.2	1.2	1.6	1.6	40%	40%
		River wash	Not mapped to association level	115.1	9.7	9.7	10.0	10.0	19.7	19.7	17%	17%
		Alluvial scrub	Not mapped to association level	0.5	0	0	0.5	0.5	0.5	0.5	100%	100%
		Big sagebrush scrub (35.110.00)	Not mapped to association level	24.6	15.8	15.8	6.5	6.5	22.3	22.3	91%	91%
		Giant reed (42.080.00)	Not mapped to association level	5.6	0	0	0.1	0.1	0.1	0.1	2%	2%
	Low to High Elevation Riparian Scrub (63.000.00)	Arrow weed scrub (63.710.00)	Not mapped to association level	7.6	4.9	4.9	2.0	2.0	6.9	6.9	91%	91%
		Mexican elderberry scrub (63.410.00)	Not mapped to association level	5.8	5.3	5.3	0.3	0.3	5.6	5.6	97%	97%
		Mulefat scrub (63.510.00)	Not mapped to association level	1.8	0.5	0.6	1.2	1.2	1.8	1.8	100%	100%
	Disturbed mulefat scrub	Not mapped to association level	1.1	0	0	1.1	1.1	1.1	1.1	100%	100%	

General Physiognomic and Physical Location	General Habitat Type	Floristic Alliance	Association	Total Acres Present	Acres Developed	Acres Developed (Reduced footprint Scenario)	Acres Temporarily Disturbed ¹	Acres Temporarily Disturbed ¹ (Reduced Footprint Scenario)	Total Acres Developed or Disturbed	Total Acres Developed or Disturbed (Reduced Footprint Scenario)	Percent Acres Developed or Disturbed	Percent Acres Developed or Disturbed (Reduced Footprint Scenario)
	Riparian Forest and Woodland (61.000.00)	Southern willow scrub (61.208.00)	Not mapped to association level	1.5	0.7	0.7	0.1	0.1	0.7	0.7	47%	47%
		Tamarisk scrub and woodland (63.810.00)	Shrub tamarisk (63.810.02)	1.1	0	0	0	0	0	0	0%	0%
		Fremont cottonwood riparian forest and woodland (61.130.00)	Southern cottonwood-willow riparian (61.130.02)	109.2	6.4	6.4	22.4	22.4	28.8	28.8	26%	26%
Man-Made Land Cover Types		Agriculture	NA	224.4	172.0	172.0	48.0	48.0	219.9	219.9	98%	98%
		Developed Land	NA	8.1	1.0	1.0	7.0	7.0	8.0	8.0	99%	99%
		Disturbed Land	NA	404.3 407.1	225.2	224.5 224.57	169.1	169.5 169.59	394.3	394.0 394.06	98 97%	97 96%
Total:				1,854.5	1,153.4	1,131.8	339.7	342.8	1,493.1	1,474.6	81 80%	80 79%

¹ Temporarily disturbed by bank stabilization, utility corridor, and/or haul roads, but would be revegetated to native vegetation or upland vegetation, where appropriate, following completion of construction

Jurisdictional Resources: The revised project would result in the same permanent and temporary impacts to U.S. Army Corps of Engineers (Corps) jurisdictional resources compared to the original project: 20.76 acres and 12.06 acres, respectively. The revised project would result in ~~the same~~ slightly increased permanent and temporary impacts to CDFG-only jurisdictional resources as ~~(2.38 acres and 13.25 acres, respectively)~~ (2.52 acres and 13.28 acres, respectively) compared to the original project.

Wildlife Habitat Loss and Impacts to Common Wildlife and Special-Status Wildlife: As described above, the revised project would result in reduced permanent impacts to existing vegetation and land covers by ~~218.8 acres (1,153.4 acres to 1,134.6 acres (or approximately 0.21.6 percent)~~ 21.6 percent compared to the original project, although temporary impacts would increase ~~3.46 acres (339.7 acres to 343.3 acres or approximately 0.01 percent)~~ 3.46 acres (339.7 acres to 343.3 acres or approximately 0.01 percent) with the revised project due to implementation of the expanded spineflower preserves. Therefore, the revised project would result in similar, but slightly reduced permanent impacts and slightly increased temporary impacts to wildlife habitat, common wildlife, and special-status wildlife compared to the original project.

Buffers/Setbacks from Riparian Resources: The revised project would result in the same buffers/setbacks from riparian resources compared to the original project, resulting in a similar potential for indirect impacts on wildlife using the River corridor.

Wildlife Habitat Linkages: The original project would preserve the integrity of the Santa Clara River as a wildlife movement corridor and minimize impacts on local and regional wildlife movement by maintaining nearly all of the Santa Clara River floodplain and adjacent uplands as open space with a minimum width of about 1,000 feet. The revised project would result in similar impacts to the wildlife habitat linkages in the River corridor.

Special-Status Plant Species: Compared to the original project, the revised project would result in reduced impacts (0.4 acres) to slender mariposa lily (14.9 acres of cumulative occupied area compared to 15.3 acres), and decreased impacts to oak trees (154 removals for the revised project compared to 158 removals for the original project; 52 encroachments for the revised project compared to 51 encroachments for the original project); similar temporary impacts to the undescribed everlasting (up to 11 individuals); and decreased impacts to San Fernando Valley spineflower (1.82 acres of cumulative occupied area compared to 3.29 acres).

As described above, the revised project would reduce permanent impacts to existing vegetation and land covers by ~~218.8 acres (1,153.4 acres to 1,134.6 acres (or approximately 0.21.6 percent)~~ 21.6 percent compared to the original project, and temporary impacts would increase ~~3.46 acres (339.7 acres to 343.3 acres or approximately 0.01 percent)~~ 3.46 acres (339.7 acres to 343.3 acres or approximately 0.01 percent) with the revised project. Therefore, the revised project would result in

similar but slightly reduced impacts to Parish's sagebrush, mainland cherry trees, island mountain-mahogany plants, Southern California black walnut, and Peirson's morning-glory than the original project.

(b) Indirect Impacts

As described above, the revised project would reduce permanent impacts to existing vegetation and land covers by ~~21.6~~18.8 acres (or approximately 0.2 percent) compared to the original project, and temporary impacts would increase ~~3.4~~6 acres (0.01 percent) with the revised project. The setbacks along the Santa Clara River would be the same for the revised project and the original project, resulting in similar indirect impacts (e.g., night lighting, domestic animals and human trespassing, noise, etc.) to wildlife habitat, common wildlife, and special-status wildlife using the River corridor compared to the original project.

(c) Significant Unavoidable Impacts

The Draft EIR, Section 4.3, Biota, indicated that the original project would contribute to significant cumulative impacts to coastal scrub and the San Fernando Valley spineflower. At the direction of the County, and in addition to the project revisions described in this Topical Response, additional mitigation measures have been identified that would mitigate these cumulative impacts to less than significant levels. Please see the portion of the Final EIR (May 2011) entitled "Revised Draft EIR Pages," and specifically, revised Section 4.3, Biota, for the additional mitigation measures. As the revised project would result in fewer impacts to biological resources than the original project, the revised project would not result in significant unavoidable impacts to biota.

Because the revised project generally would result in fewer direct and indirect biota impacts when compared to the original project, because any increase in permanent impacts would be slight and temporary impacts would be limited in duration and nature, and because the same mitigation in the EIR, Section 4.3, Biota, would apply to the revised project to reduce the identified impacts to a level below significant, no new or more severe significant biota effects are expected to occur with implementation of the revised project.

(5) Floodplain Modifications

The revised project would not reduce the extent of floodplain modifications compared to the original project. The reduction in the total number of dwelling units on the site would not reduce impacts on sensitive aquatic/riparian resources in the Santa Clara River corridor as the revised project would not substantially affect flows, water velocities, water depth, changes in sediment transport, and changes in flooded areas when compared to the original project. Although the original project creates only minor

hydraulic effects, which are insufficient to alter the amount, location, and nature of aquatic and riparian habitats in the project area and downstream, as well as insufficient to impact sensitive riparian species, including the unarmored threespine stickleback, arroyo toad, California red-legged frog, southwestern pond turtle and two-striped garter snake, the revised project would result in similar impacts to the original project relative to floodplain modifications because it would result in similar hydraulic impacts.

As to the interim chloride reduction facilities, no significant floodplain modification impacts are expected because (1) most of the construction activities would occur within the existing road rights-of-way in the project's utility corridor, and the environmental effects of constructing the proposed utility corridor were addressed in the Mission Village Draft EIR, Section 4.0, Environmental Impacts Analysis; and (2) no flood protection is required for either the demineralization or the brine disposal sites.

Accordingly, no new or more severe significant floodplain modification effects are expected to occur with implementation of the revised project.

(6) Visual Qualities

Development of the project site under the revised project or the original project would be subject to Development Regulations and Design Guidelines contained in the Newhall Ranch Specific Plan. These regulations and guidelines address grading, lighting, fencing, landscaping, signage, architecture, and site planning for subsequent subdivisions within the Specific Plan area. Despite such features, under the original project, significant visual impacts would result from the change in the visual character of the site from rural to urban. As with the original project, the revised project also would significantly alter the visual characteristics of the Santa Clara River/SR-126 and I-5 corridors, as existing open space views would be replaced with the images of residential development, roadways, and other human activity.

Additionally, development under either the original project or the revised project would introduce sources of outdoor illumination that do not presently exist. Outdoor lighting, such as streetlights and traffic signals, are essential safety features in development projects that involve new streets and intersections, and cannot be eliminated if the site is to be developed.

As to the interim chloride reduction facilities, most of the construction activities affecting visual resources would occur within the existing road rights-of-way in the project's utility corridor. The environmental effects of constructing the proposed utility corridor were addressed in the Mission Village Draft EIR, Section 4.0, Environmental Impacts Analysis. In addition, both the demineralization and brine disposal sites are surrounded by existing or planned development; therefore, no significant visual impacts are associated with either site. The sites themselves are relatively small in size (1.2 and 1.6 acres, respectively). The demineralization site also would be in the immediate vicinity of the existing Valencia

WRP, and would border the I-5 corridor. The brine disposal site would be located in the Valencia Commerce Center, which is partially constructed and occupied, and the well facilities located within that site would be housed in an enclosure within the existing Commerce Center site. Lastly, the brine disposal site would be located northeast of and immediately adjacent to Commerce Center Drive, and north of the Castaic Creek. Commerce Center Drive is a major arterial roadway.

In conclusion, the revised project would result in similar impacts to the original project relative to visual qualities. Thus, no new or more severe significant visual effects are expected to occur with implementation of the revised project.

(7) Traffic and Access

Implementation of the revised project would reduce the number of vehicle trips generated by on-site uses when compared to the original project due to the reduction in the number of dwelling units that would be built. Specifically, average daily trip generation for the original project is estimated at 58,452 trips. In comparison, the revised project would generate approximately 55,895 trips, resulting in a reduction of 2,557 trips when compared to the original project (a 5 percent reduction in traffic trips). (See Final EIR (May 2011) Appendix F4.5, Technical Memorandum, *Mission Village Revised Project Trip Generation Estimates*, Austin-Foust Associates, Inc. (March 8, 2011).) Under either the revised project or the original project, the proposed project would represent a balanced land plan that contains neighborhood-serving commercial uses that are connected to the residential areas by paseos and trails, thereby promoting alternative means of travel and keeping many vehicle trips internal to the project site and vicinity.

As to the interim chloride reduction facilities, most of the construction activities affecting traffic would occur within the existing road rights-of-way in the project's utility corridor. The environmental effects of constructing the proposed utility corridor were addressed in the Mission Village Draft EIR, Section 4.0, Environmental Impacts Analysis, and the overall traffic effects of the Mission Village project site were analyzed in the Draft EIR, Section 4.5, Traffic/Access. While both the demineralization and brine disposal sites are expected to draw traffic trips, those trips would be limited to temporary construction trips and intermittent facility maintenance trips and, therefore, would be limited in number and frequency and less than the total traffic trips projected under the proposed project.

Because the total number of vehicle trips under the revised project would be lower than under the original project, the revised project would result in fewer impacts than the original project with respect to traffic. Thus, no new or more severe significant traffic effects are expected to occur with implementation of the revised project.

(8) Noise

Under either the revised project or the original project, development of the property would involve clearing and grading of the ground surface, installation of utility infrastructure, and the building of the proposed improvements. These activities typically involve the temporary use of heavy equipment, smaller equipment, and motor vehicles, which generate both steady static and episodic noise. This noise would primarily affect the occupants of on-site uses constructed in the earlier phases of the development (assuming that the site is occupied in sections as other portions are still under construction), as well as residents of the off-site Westridge development, resulting in potentially significant impacts that would be mitigated to a level below significant. While this construction activity noise could be audible to occupants of Travel Village when construction activities would occur on the northwestern portion of the site, the increased noise levels would not exceed the applicable thresholds of significance and, therefore, would not result in significant impacts.

Daytime pile driving in the Santa Clara Riverbed, should it occur during the construction of the proposed Commerce Center Drive Bridge, would be audible to occupants of on-site uses constructed prior to the bridge, and to the occupants of Travel Village and nearby non-residential uses, including visitors and employees of Magic Mountain Theme Park. When utilizing conventional equipment, and assuming no attenuation by terrain, structures or vegetation, the potential range of significant noise impacts for noise sensitive receptors from this activity would be approximately 4,000 feet, and would occur for a period of approximately 9 to 12 months during the latter phases of project construction. Noise-sensitive receptors on the site within this 4,000-foot range could include persons that would reside in apartments, condominiums, and single-family residences constructed prior to the bridge. Off-site sensitive receptors within this 4,000-foot range would include occupants of the eastern half of Travel Village. Pile driving noise impacts on future residents of Landmark Village, should Landmark Village be constructed before the Commerce Center Drive Bridge, would be less than significant. Because project construction activities (i.e., pile driving) could cause noise levels at nearby existing and future receptors to exceed the Noise Ordinance standards, construction noise impacts are considered significant without mitigation. These impacts were identified in the Draft EIR as significant and unavoidable. However, at the Planning Commission's request, the applicant conducted additional analysis and review, and determined mitigation is available that would reduce the identified impacts to a level below significant. Accordingly, revised mitigation is included that, in lieu of conventional pile driving equipment, requires the use of pile drilling techniques or hydrohammer pile driving equipment with noise reduction, or an alternative methodology that would provide the equivalent noise level reductions, which would reduce noise levels substantially. With mitigation, potential noise impacts attributable to pile-driving activities would be reduced to a level below significant with both the original project and the revised project. As to vibration

impacts, vibration from the pile driving would result in potentially significant impacts to locations within 500 feet of the activity. These impacts were identified in the Draft EIR as significant and unavoidable. However, mitigation is included to ensure that vibration-related impacts are less than significant. Because the same mitigation in the EIR Section 4.6 would apply to the revised project, for this reason, the revised project would result in similar impacts to the original project with regard to construction vibration.

With respect to operational impacts, under either the revised project or the original project, building occupants would be subject to traffic noise along off-site and internal roadways, noise from Magic Mountain Theme Park, as well as noise from day-to-day activities at the site. However, as the number of traffic trips would be slightly less than the original project, roadway noise levels and associated impacts would be slightly reduced under the revised project.

Relatedly, because the revised map results in a re-numbering of some of the lots, the five lots identified in the Draft EIR as significantly impacted by traffic along Commerce Center Drive and Magic Mountain Parkway would change from Lots 85, 86, 87, 468 and 512 (single-family residences, apartment/condominiums and residential/commercial), to Lots 561, 562, 563, 564, and 512 (single-family residential and residential/commercial) under the revised project. Lots 85, 86, and 87 now front on open space and would no longer be significantly impacted, Lot 468 (formerly apartment/condominium) is now included within one of the expanded spineflower preserves, and Lot 512 is unaffected and addressed by mitigation measure MV 4.6-8.

To address the change from the impacted lots along Commerce Center Drive from Lots 85-87 to Lots 561-564, Draft EIR Mitigation Measure MV 4.6-5 is revised as follows:

MV 4.6-5 To mitigate the noise impacts on Lots ~~85, 86, and 87~~ 561, 562, 563 and 564 (Area A2) (single-family residential) that back onto Commerce Center Drive from traffic on the proposed Commerce Center Drive extension through the site, the project applicant shall, prior to occupancy, construct a 5-foot solid wall along the rear lot lines of these lots. The wall may be constructed of 3/8 or 5/8-inch Plexiglas or other material of similar acoustic performance, and shall be continuous with no breaks or gaps.

As to Lot 468, under the original project, Lot 468 was designated for apartment/condominium use. However, under revised VTTM No. 61105, the spineflower preserves were expanded and now include Lot 468. Draft EIR Mitigation Measure MV 4.6-6 addresses significant impacts to Lot 468. As Lot 468 no longer includes sensitive receptors and would no longer be significantly impacted by project noise, Mitigation Measure MV 4.6-6 is no longer necessary.

The demineralization site would generate noise levels of approximately 80 decibels and emergency generators would generate noise levels at approximately 90 decibels. However, the demineralization

equipment would be located in an enclosed facility, which would reduce projected noise levels by approximately 15 decibels. The site also would be proposed adjacent to the I-5/Rye Canyon off-ramp, adjacent to The Old Road and the Valencia WRP. The Old Road is major, arterial roadway providing a secondary north-south access route in addition to I-5. No noise sensitive uses are in the vicinity of the site. In addition, the traffic from the I-5 freeway and The Old Road would be expected to generate noise levels in excess of those generated from the demineralization site.

The brine injection pumps would have noise levels of approximately 85 decibels. The pumps would be located inside an enclosure, which would reduce projected noise levels by approximately 15 decibels. Nearby uses are industrial and do not contain any noise sensitive uses. In conclusion, operational noise impacts under both the original project and the revised project would be mitigated to levels less than significant. Thus, no new or more severe significant noise effects are expected to occur with implementation of the revised project.

(9) Air Quality

Under the revised project, because the development footprint would be reduced slightly in size, short-term grading and construction-related air quality impacts would be slightly reduced as compared to those of the original project. While the total number of construction days would likely be reduced in proportion to the reduction in graded area, because the length of grading time per day would likely not decrease (just the *total number* of construction days), receptors would still be exposed to the same amount of daily emissions.

Long-term (i.e., operational) air quality impacts under the revised project would also be reduced when compared to the original project, as the number of operational traffic trips would be reduced by approximately 5 percent primarily because of the change in residential unit mix (i.e., fewer single-family units and more multi-family units). This would slightly reduce air emissions by approximately 5 percent per day compared to the original project. Both the original project and the revised project would result in the exceedance of South Coast Air Quality Management District (SCAQMD) air quality thresholds in the summertime for Carbon Monoxide (CO), Volatile Organic Compounds (VOC), and Oxides of Nitrogen (NO_x). Wintertime emissions also would result in the exceedance of air quality thresholds for CO, VOC, Particulate Matter (PM₁₀) and NO_x. ~~Nonetheless,~~

The proposed project would require two 500-kilowatt (kW) emergency generators to operate the demineralization and brine injection equipment in the event of a power loss. The emergency generators would result in emissions of volatile organic compounds (VOCs), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), respirable particulate matter (PM₁₀), and fine particulate matter

(PM_{2.5}). These criteria air pollutants would be emitted during intermittent emergency operations and as part of routine intermittent maintenance and testing.

The emissions associated with the emergency generators are presented in Table TR4-3, Estimated Emissions from Two 500 kW Emergency Generators. The emissions assume that each generator would operate for 1 hour in a day for maintenance and testing once per week and would comply with South Coast Air Quality Management District (SCAQMD) Best Available Control Technology (BACT) requirements.

Table TR4-3
Estimated Emissions from Two 500 kW Emergency Generators

<u>Phase</u>	<u>Criteria Pollutants in Pounds per Day / GHGs in MTCO_{2e}</u>						
	<u>VOC</u>	<u>NO_x</u>	<u>CO</u>	<u>SO_x</u>	<u>PM₁₀</u>	<u>PM_{2.5}</u>	<u>GHGs</u>
<u>Two 500 kW Emergency Generators</u>	<u>0.44</u>	<u>8.43</u>	<u>7.69</u>	<u>0.00</u>	<u>0.44</u>	<u>0.44</u>	<u>35.36</u>

Source: Impact Sciences, Inc., (2011).

Even with the emissions outlined in Table TR4-3, above, air quality emissions of the revised project would be less than the proposed project. Detailed air emissions calculations are found in Appendix F4.7(A) of the Mission Village Final EIR (October 2011).

Both the original project and the revised project would result in SCAQMD air quality thresholds being exceeded in the summer and winter for Carbon Monoxide (CO), Volatile Organic Compounds (VOC), Oxides of Nitrogen (NO_x), and Fine Particulate Matter (PM₁₀), including respirable particulate matter PM_{2.5}.

Nonetheless, because there would be fewer developed acres under the revised project than under the proposed project, because the same mitigation in the EIR, Section 4.7, Air Quality, would apply to the revised project, and because the revised project would generate slightly less vehicular air emissions than the original project, the revised project would result in fewer impacts to air quality than the original project, and, as a result, no new or more severe significant air quality effects are expected to occur with implementation of the revised project.

(10) Water Service

The original project would generate a potable water demand of approximately 1,676 acre-feet per year (afy) and a non-potable demand of 1,243 afy. Potable water would be supplied to the project by the Valencia Water Company from local groundwater supplies. Non-potable water would be provided to the project by either the Newhall Ranch Water Reclamation Plant (WRP) or the Valencia WRP on an interim basis.

In comparison, the potable water demand for the revised project would be 1,531 afy and the non-potable demand would be 1,274 afy, which represents a decrease in potable water demand of 145 afy, and an increase in non-potable water demand of 31 afy when compared to the original project. The decrease in potable water demand is primarily due to the change in the mix of residential units and reduction in the total number of residential units. The increase in non-potable demand is attributable to an increase in the acreage of land uses that have an increased demand for common area irrigation when compared with the original project. Given that the revised project would result in less potable water demand than the original project (i.e., a reduction in potable water demand of approximately 8 percent), the revised project would result in reduced impacts to water service compared to the original project. Specific to the interim chloride reduction facilities, no material increase in potable water supply would be needed with respect to construction or operation of either the demineralization or brine disposal sites and related underground lines connecting to and from the Valencia WRP.

Thus, no new or more severe significant water supply effects are expected to occur with implementation of the revised project.

(11) Wastewater Disposal

Wastewater generation under the original project would be approximately 0.96 million gallons per day (mgd). As a result of the reduction in dwelling units, this amount would decrease to 0.90 mgd with the revised project, which represents a decrease of 0.06 mgd when compared to the original project (a 6 percent decrease). As with the original project, wastewater from the revised project would be treated either by the Newhall Ranch WRP (if available), or by the Valencia WRP on an interim basis until the Newhall Ranch WRP is completed, with a relatively small amount of the wastewater (0.266 mgd) may be permanently treated at the Valencia WRP. Based on or Newhall Ranch WRP, subject to final approval or coordination with the County Sanitation Districts of Los Angeles County (CSDLAC). Based on CSDLAC future wastewater generation estimates and the planned expansion of the Saugus and Valencia WRPs, the Valencia WRP would have sufficient capacity to temporarily accommodate the original project's predicted wastewater generation of 0.695 mgd, so the 0.634 mgd that would be generated under the

revised project could also be accommodated. The Valencia WRP would also have sufficient capacity to permanently accommodate the project's predicted wastewater generation directed to the Valencia WRP of 0.266 mgd, which remains unchanged under the revised project. For these reasons, the revised project would result in slightly fewer impacts when compared with the original project with respect to wastewater generation and treatment. Thus, no new or more severe significant wastewater effects are expected to occur with implementation of the revised project.

For a further assessment of the overall environmental impacts associated with the interim treatment of wastewater for the first 6,000 dwelling units on Newhall Ranch, please see **Topical Response 4, Subsection 2.0, A.**, above.

(12) Solid Waste Services

The original project would generate 8,451 tons of solid waste per year. In comparison, the revised project would generate 8,006 tons of solid waste per year, which represents a decrease of 444 tons per year of solid waste generated compared to the original project. To the extent the revised project would generate slightly less solid waste than the original project, the revised project, therefore, would result in slightly fewer impacts than the original project relative to solid waste services, although impacts would remain significant and unavoidable. Specific to the interim chloride reduction facilities, there would be no material change or increase in solid waste generation with implementation of the proposed facilities.

Thus, no new or more severe significant solid waste effects are expected to occur with implementation of the revised project.

(13) Sheriff Services

The original project would result in a resident population of approximately 10,802 persons, which would increase the demand for law enforcement and traffic-related services on the project site and the local vicinity in terms of personnel and equipment. As a result, the original project would require the services of an additional 11 sworn officers. In comparison, the revised project would result in a population of 9,928 persons, a slight reduction of 874 persons. Given the Sheriff Department ratio of 1 officer per 1,000 persons, the revised project would require the services of 10 officers. Therefore, from a sheriff services standpoint, the revised project would result in impacts slightly less than the original project with respect to law enforcement. Specific to the interim chloride reduction facilities, there would be no material change or increase in the use of law enforcement services with implementation of the proposed facilities.

Thus, no new or more severe significant law enforcement effects are expected to occur with implementation of the revised project.

(14) Fire Protection Services

The project site is located in an area that has been designated as a Very High Fire Hazard Severity Zone (formerly called Fire Zone 4) by the County's Fire Department, which denotes the County Forester's highest fire hazard potential. Any land use constructed on the site would be required to meet all County codes and requirements relative to providing adequate fire protection services to the site during both the construction and operational stages of the project.

Since the number of housing units would be slightly reduced under the revised project, the number of fire protection service calls to the revised project site presumably would also be slightly reduced relative to the original project. Under either the original project or the revised project, the fire station would be constructed. As a result, site development under either the original project or the revised project would not diminish the staffing or the response times of existing fire stations in the Santa Clarita Valley, nor would it create a special fire protection requirement on the site that would result in a decline in existing service levels. Based on this information, the revised project would result in similar impacts to the original project with respect to fire protection services. Specific to the interim chloride reduction facilities, there would be no material change or increase in the use of fire protection services with implementation of the proposed facilities.

Thus, no new or more severe significant fire protection effects are expected to occur with implementation of the revised project.

(15) Education

The original project would generate an estimated 969 elementary school students, 267 middle school students, and 378 senior high school students for the three affected school districts at project build out. Because the revised project would both reduce the number and change the mix of dwelling units compared to the original project, fewer students would be generated under the revised project. The revised project would generate an estimated 875 elementary school students, 241 middle school students, and 342 senior high school students. This reduction amounts to 94 fewer elementary school students, 26 fewer middle school students and 36 fewer high school students when compared to the original project.

Development of either the original project or the revised project would be subject to the funding agreements established between the applicant and the affected school districts. Given that all future development, including the original project or the revised project, must comply with existing school facilities funding agreements and other funding mechanisms (e.g., Senate Bill [SB] 50, the Valley-Wide Joint Fee Resolution, and/or new school facilities funding agreements), the revised project would result in impacts similar to the original project with respect to education. Specific to the interim chloride reduction

facilities, there would be no material change or increase in the use of education services with implementation of the proposed facilities.

Thus, no new or more severe significant educational effects are expected to occur with implementation of the revised project.

(16) Parks and Recreation

The original project includes approximately 25 acres of active parkland consistent with the Specific Plan's Land Use Overlay Community Park designation for the area. The original project also includes 14.7 acres of private recreation areas, 18,980 linear feet (9.3 acres) of community trails, and 217 acres of River Corridor. In light of these project components and the parkland credits allowed by the County Department of Parks and Recreation, the project results in a total park provision of 101.6 acres of equivalent park space. This results in a parkland dedication equivalent to approximately 10.3 acres per 1,000 persons, which is greater than the County and Quimby Act requirements of 3.0 acres per 1,000 persons.

In comparison, development of the revised project would provide the same 25.0 acres of active parkland, with the same amount of private recreation areas and trails. As to the River Corridor, a total of 4.4 acres has been moved to the San Fernando Valley spineflower preserves, decreasing the amount of River Corridor under the revised project to 212.6 acres. However, with a decrease in project population resulting from the development of fewer residential dwellings, implementation of the revised project would result in the provision of 100.4 acres of equivalent park space and a parkland dedication of approximately 11.1 acres per 1,000 persons, which is greater than that provided by the original project and greater than the County and Quimby Act requirements of 3.0 acres per 1,000 persons. For these reasons, the revised project would result in fewer impacts than the original project with respect to parks and recreation. Specific to the interim chloride reduction facilities, there would be no material change or increase in the use of parks and recreation services with implementation of the proposed facilities.

Thus, no new or more severe significant parks and recreation effects are expected to occur with implementation of the revised project.

(17) Library Services

Based on the County library level of service guideline of 0.50 square feet of library facilities per capita and the adopted County library planning standard of 2.75 library books per capita, development of the original project would require a total of 5,401 square feet of library facilities and 29,705 items (books, magazines, periodicals, etc.). In comparison, as a result of the reduced on-site population, the revised

project would require a total of 4,964 square feet of library facilities with 27,302 additional volumes of books for the library system's collection. This results in a decrease in demand of 437 square feet of library facilities and 2,403 library books when compared to the original project.

As part of the County's approval of the Newhall Ranch Specific Plan, the County adopted library mitigation requiring that the developer provide funding for the construction and development of library facilities on the Specific Plan site. This requirement would apply equally to the revised project, as well as to the original project. Therefore, because the revised project would result in less demand for space and items than would the original project, the revised project would result in reduced impacts when compared to the original project relative to library services, although under either the original or revised project, the demand for space and items would be met by construction and operation of the new library facilities, as required by the Specific Plan mitigation. Specific to the interim chloride reduction facilities, there would be no material change or increase in the use of library services with implementation of the proposed facilities.

Thus, no new or more severe significant library effects are expected to occur with implementation of the revised project.

(18) Agricultural Resources

Development of the original project would result in the loss of 160.7 acres of Prime Farmland, 30.1 acres of Unique Farmland, and 0.6 acre of Farmland of Statewide Importance. Development of the VTTM site under the revised project would result in the same loss of prime agricultural land and agricultural production as the original project because the reduction in the development footprint would occur on non-agricultural land. As to forest resources (e.g., oak, cottonwood), impacts under the revised project would be the same as those impacts under the original project. Consequently, the revised project would result in impacts similar to the original project with respect to agricultural ~~resources and forest resources~~. Specific to the interim chloride reduction facilities, there would be no material change or increase in impacts to designated agricultural resources with implementation of the proposed facilities.

Thus, no new or more severe significant agricultural resource effects are expected to occur with implementation of the revised project.

(19) Utilities

Under the original project analysis presented in the Draft EIR, current projections for energy supply and demand by Southern California Edison (SCE) and the Southern California Gas Company (SCGC) indicate that these utility providers would have sufficient electricity and natural gas resources to serve the project

site. Since the revised project would result in a reduced amount of residential development, the energy estimates presented in the Draft EIR overstate demand. More specifically, because of the reduced residential unit count, the demand for electricity would be reduced from approximately 17,643,509 to 16,215,872 kWh/yr and the demand for natural gas would be reduced from approximately 156,055 to 143,428 MMBTU/yr. Thus, energy use associated with the revised project would be less than that identified for the original project.

In addition, all development on the Mission Village project site would be required to comply with Title 24, Assembly Bill (AB) 970, and AB 32 energy conservation measures. Moreover, the applicant has committed to designing all residential and non-residential uses to be 15 percent more energy efficient than required by Title 24 (2008); this commitment would apply to the original project and the revised project. Based on the above, the revised project would result in impacts that are slightly less than the original project with respect to utilities. As to the interim chloride reduction facilities, there would be no material change or increase in the use of energy with implementation of the proposed facilities.

Thus, no new or more severe significant utility impacts are expected to occur with implementation of the revised project.

(20) Mineral Resources

The revised project would result in a smaller development footprint, thereby requiring less grading than would the original project (the graded development footprint would be reduced by approximately 2 percent). As such, the potential for disturbance or over covering of any potential mineral resource deposits during site development would be reduced when compared to the original project. For this reason, the revised project would result in fewer impacts when compared to the original project with respect to mineral resources. Specific to the interim chloride reduction facilities, there would be no material change or increase in the use of mineral resources with implementation of the proposed facilities.

Thus, no new or more severe significant mineral resource effects are expected to occur with implementation of the revised project.

(21) Environmental Safety

The potential environmental safety impacts relative to development of the original project site include soil contamination attributable to past and present agricultural activities, on-site petroleum (i.e., oil) drilling and pipeline activities, and the disposal of on-site hazardous materials debris. Although the development footprint would be reduced, future residents of either the original project or revised project

potentially would be subjected to these potential hazards unless remediated. For these reasons, the revised project would result in impacts similar to the original project with respect to environmental safety. Specific to the interim chloride reduction facilities, there would be no material change or increase in environmental safety with implementation of the proposed facilities.

Thus, no new or more severe significant environmental safety effects are expected to occur with implementation of the revised project.

(22) Cultural/Paleontological Resources

The revised project would result in a smaller development footprint and require less grading near to known archaeological and paleontological resources than would the original project. As such, the potential for disturbance to known cultural/paleontological resources during construction activities under the revised project would be reduced when compared to the original project. For this reason, the revised project would result in fewer impacts when compared to the original project with respect to cultural/paleontological resources. Specific to the interim chloride reduction facilities, there would be no material change or increase in impacts to cultural/paleontological resources with implementation of the proposed facilities.

Thus, no new or more severe significant cultural/paleontological effects are expected to occur with implementation of the revised project.

(23) Global Climate Change

Both the original project and the revised project would employ the same PDFs and emission reduction strategies to reduce the overall level of greenhouse gas (GHG) emissions on the project site, and ensure consistency with AB 32. Nonetheless, under the revised project, the one-time release of GHG emissions associated with vegetation/land use change and construction would be slightly less, as compared to the original project, because the overall development footprint would be reduced slightly in size, thereby reducing the amount of grading and extent of construction activities. Additionally, the revised project's annual GHG emission levels would be slightly reduced relative to the original project due to the reduction in number of total residential dwelling units. Specifically, annual GHG emissions attributable to residential building energy use, mobile sources, and water demand (including conveyance, treatment and distribution) would be less. ~~In summary, the revised project would result in fewer impacts than the original project as it would generate slightly less GHG emissions than the original project.~~

As to the interim chloride reduction facilities, there would be no material change or increase in the use of energy, and the related emission of GHG, with implementation of the proposed facilities. The emissions

that would be generated by the emergency generators for the demineralization and brine disposal sites are discussed and presented in Air Quality, Table TR4-3, above. Please see Appendix F4.7(A) for detailed calculations and supporting documentation.

In summary, the revised project would result in fewer impacts than the original project as it would generate slightly less GHG emissions than the original project. Thus, no new or more severe significant climate change impacts are expected to occur with implementation of the revised project.

(24) Conclusion on Environmental Analyses

Under the revised project, impacts associated with geotechnical and soil resources, hydrology, water quality, traffic/access, air quality, noise, water service, wastewater, biota, parks and recreation, library services, cultural/paleontological resources, sheriff services, solid waste services, mineral resources, utilities, and climate change generally would be reduced when compared to the original project due to the decrease in the number of dwelling units that would be built and the corresponding reduction in development. The revised project would have similar impacts with respect to floodplain modifications, visual qualities, fire services, education, agricultural resources, and environmental safety when compared to the original project. However, on balance, the revised project would result in fewer impacts than the original project.

Significant and Unavoidable Impacts would occur under the original project with respect to the following environmental topic areas: visual qualities, air quality, solid waste services, and agricultural resources. While the revised project would result in fewer impacts than the original project due to the decrease in the number of dwelling units that would be built and the corresponding reduction in development, these significant and unavoidable impacts would also occur with the revised project.

Updated Topical Response 5: Chloride

1. INTRODUCTION

Comments on the Mission Village Draft EIR claim that chloride has had a significant impact on the natural river ecosystem due to high levels of chloride in treated wastewater effluent and runoff from urban areas. The comments assert that the river ecosystem already has been impacted by high concentrations of chloride in the Santa Clara River. Further, comments ~~assert~~state that the Mission Village Draft EIR is deficient by not eliminating future projected increases in chloride levels in the implementation of the Mission Village project.

Comments claim that an agreement between the project applicant (Newhall) and Sanitation Districts Nos. 26 and 32, later consolidated as the Santa Clarita Valley Sanitation District (SCVSD), violates the conditions of the Newhall Ranch Specific Plan, and places the Santa Clarita Valley in jeopardy of “continued non-compliance” with the chloride total maximum daily load (TMDL) under the Clean Water Act. Comments also question the cost implications of the “clean up of chlorides required to comply with the Clean Water Act.” Other comments assert that high chloride levels in water supply wells and the use of Nickel water will add to the chloride load from ~~plant~~Water Reclamation Plant (WRP) discharges. Comments claim that groundwater is already “contaminated” with chloride, which would be exacerbated under the proposed project.

Further, comments claim that the only option for reducing chloride impacts is the ~~partial~~phased or full construction of the Newhall Ranch ~~Water Reclamation Plant (WRP)~~ or requiring the applicant to pay its share of the cost of providing facilities at the Valencia WRP to treat its effluent to meet the 100 milligrams per liter (mg/L) chloride objective, which is applicable to the Newhall Ranch WRP. Comments also oppose the interim use of the Valencia WRP to serve ~~homes~~up to 6,000 dwelling units from both the Mission Village and Landmark Village projects within the Newhall Ranch Specific Plan. Comments claim that interim use of the Valencia WRP will compound its treatment problems, and make it more difficult for the SCVSD to comply with the chloride objectives in the “Alternative Water Resources Management” (AWRM) Plan ~~for chlorides (also known as the Alternative Compliance Plan or ACP).~~ Comments claim that the SCVSD’s failure to comply with the ~~Alternative Water Resource Management~~AWRM Plan, and its required timelines, will result in the imposition of the stricter 100 mg/L chloride TMDL standard. Comments infer that interim use of the Valencia WRP will not result in the construction of the Newhall Ranch WRP.

Additional comments state that the temporary discharge of Newhall Ranch wastewater to the existing Valencia WRP from the first 6,000 units in Newhall Ranch’s Mission Village and Landmark Village would “elevate the chloride load rather than reducing it.”

Related comments also have stated that the project's potable water supply (the "E Wells") is often naturally high in chloride, and that due to typical chloride "pickup" levels in domestic water, the project may pose a significant impact due to its contribution of chloride in treated wastewater discharges, possibly exceeding the chloride TMDL wasteload allocation of 100 mg/L.

This topical response addresses these chloride-related comments ~~received on the Mission Village Draft EIR.~~ At the outset, ~~however,~~ some background information is appropriate for overall context.

2. WASTEWATER PLAN

Both the Mission Village Draft EIR and the Landmark Village Recirculated Draft EIR described and analyzed each project's wastewater/sewer plan, including the routing of sewer lines and the delivery system to serve each project site within the approved Newhall Ranch Specific Plan. As stated in each EIR, the long-range plan is for the Newhall Ranch WRP to be constructed to serve uses within the Specific Plan area, and the new County sanitation district (i.e., NRSD) has been formed to implement the Newhall Ranch WRP, and to coordinate with the SCVSD, with regard to the establishment of the new Newhall Ranch sanitation district and its WRP and sewerage conveyance system. This coordination enables the County to verify that the Newhall Ranch development is consistent with the County's General Plan and Specific Plan buildout requirements. Part of this coordination involved Newhall entering into the Interconnection Agreement, dated January 9, 2002, with the Sanitation District Nos. 26 and 32, later consolidated as the SCVSD.²⁷

The Interconnection Agreement sets conditions under which the first 6,000 dwelling units in Newhall Ranch may temporarily discharge wastewater to the Valencia WRP. The conditions include payment of the standard SCVSD connection fee (fair share of the cost of the existing infrastructure) and transfer of title of the 22-acre Newhall Ranch WRP site to the NRSD. Newhall Ranch residents also would pay the SCVSD an annual service charge to cover the full cost of treating their wastewater at the Valencia WRP. Temporary treatment of wastewater at the Valencia WRP would not eliminate the need for the project applicant (Newhall) to construct the Newhall Ranch WRP. Prior to building more than 6,000 dwelling units, Newhall must construct the Newhall Ranch WRP to serve Newhall Ranch development and finance the new sewerage system. In addition, the Valencia WRP has the available capacity for temporary

²⁷ A copy of the Interconnection Agreement is found in **Appendix F4.9** of the Mission Village Final EIR (May 2011).

treatment of the Newhall Ranch wastewater (up to 6,000 dwelling units); thus, no negative impact to the CSD's sewerage system is expected.²⁸

The Newhall Ranch Specific Plan Revised Draft EIR (March 1999) and the Revised Additional Analysis (May 2003) evaluated the environmental impacts related to development of the Specific Plan, including construction of the Newhall Ranch WRP to a project level and the new sewerage facilities at a programmatic level to serve the Specific Plan. The County is in the process of completing further CEQA compliance of the Newhall Ranch wastewater/sewer system at the project level for both Mission Village and Landmark Village in two pending project EIRs. Both the Mission Village Draft EIR and the Landmark Village Revised Draft EIR note that the environmental effects of constructing and operating the Newhall Ranch WRP at buildout were evaluated at the project-level in the prior certified Newhall Ranch Specific Plan environmental documentation. Both EIRs have identified options to treat wastewater generated by each project during the interim until the Newhall Ranch WRP is constructed. Specifically, both EIRs identified an option to construct a pump station at each project site where wastewater would be pumped back to the existing Valencia WRP until such time as the first phase of the Newhall Ranch WRP is constructed. (See, e.g., Mission Village Draft EIR, Section 1.0, Project Description, pp. 1.0-69 through 1.0-70, and Section 4.9, Wastewater Disposal, pp. 4.9-10 through 4.9-12.)

As part of the project applicant's separate but related Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan (RMDP/SCP) project, Newhall also has committed to constructing, if needed, interim chloride reduction and demineralization facilities (proposed interim chloride facilities) to further treat Newhall Ranch project wastewater, until such time as the first phase of the Newhall Ranch WRP is constructed (i.e., up to 6,000 dwelling units per the terms of the 2002 Interconnection Agreement). The Newhall Ranch RMDP/SCP EIS/EIR, prepared jointly by CDFG and the U.S. Army Corps of Engineers (Corps), evaluated the proposed interim chloride facilities at a program level, stating that the project EIRs for Mission Village and Landmark Village would evaluate such facilities at the project level.

3. REGIONAL REGULATORY EFFORTS

The Los Angeles Regional Water Quality Control Board (RWQCB) protects groundwater and surface water quality in the Los Angeles Region, including the coastal watersheds of Los Angeles and Ventura

²⁸ Moreover, the environmental implications of the build-out of the Valencia WRP to its capacity were assessed in the SCVSD's certified EIR for the 2015 Santa Clarita Valley Joint Sewerage System Facilities Plan, which is incorporated by reference and available at http://www.lacsd.org/info/publications_n_reports/wastewater_reports/final2015scv/default.asp or upon request to SCVSD.

counties, along with very small portions of Kern and Santa Barbara counties. The RWQCB adopted chloride objectives for individual reaches of the Santa Clara River as part as the Water Quality Control Plan for the Los Angeles Region (Basin Plan). The chloride objectives were established on what were assumed to be background water conditions at specific locations within the reaches and also protection of the off-stream agricultural beneficial use.

Under section 303(d) of the Clean Water Act, states are required to develop lists of waters that do not meet water quality standards even after point sources of pollution have installed the minimum required levels of pollution control technology. The law requires that states develop TMDLs for these impaired waters. High levels of chloride in the Santa Clara River have caused listings for impairment, and chloride TMDLs have been developed and adopted into the Basin Plan.

The RWQCB's adopted chloride TMDL is described in the RWQCB staff report, dated November 24, 2008; RWQCB Resolution; Basin Plan Amendments; and other pertinent documents, which are available on the RWQCB's website, located at http://www.waterboards.ca.gov/losangeles/board_decisions/basin_plan_amendments/technical_documents/bpa_69_2008-012_td.shtml (last accessed ~~April 6~~ August 24, 2011), and incorporated by reference.

In connection with this regional effort, the RWQCB acted as the lead agency for evaluating the environmental effects of the amended chloride TMDL, adoption of conditional site-specific objectives (SSOs) for chloride in river reaches and groundwater basins in the Upper Santa Clara River watershed, and other interim wasteload allocations (sulfate and total dissolved solids). The result of this effort led to RWQCB's completion and approval of the "Substitute Environmental Document for the Upper Santa Clara River Chloride TMDL Reconsideration and Conditional Site Specific Objectives," which was prepared under the CEQA requirements for a certified regulatory program. RWQCB's environmental documentation was based on the amended chloride TMDL that was considered and approved as an amendment to the Basin Plan. This environmental documentation is available on RWQCB's website, found at http://www.waterboards.ca.gov/losangeles/board_decisions/basin_plan_amendments/technical_documents/bpa_69_2008-012_td.shtml (last accessed ~~April 6~~ August 24, 2011), and incorporated by reference.

The County acknowledges the regional efforts summarized above. However, the County considers these regional efforts to be well beyond the scope of a project-level EIR for a proposed development project. Nonetheless, the County has made a good-faith effort to respond further below to the comments received on the Mission Village Draft EIR, even though several of the comments address the broader regional chloride reduction efforts underway in the Upper Santa Clara River watershed.

~~2. Background~~

4. COUNTY PLANNING EFFORTS

On March 23, 1999, and, again, on May 27, 2003, the County's Board of Supervisors (Board) certified the environmental documents for the Newhall Ranch Specific Plan and the Newhall Ranch ~~Water Reclamation Plant (WRP)~~. The certified 1999 Newhall Ranch ~~Specific Plan Program EIR~~ Revised Draft EIR and the Revised Additional Analysis (May 2003) evaluated the Newhall Ranch WRP at a project level ~~of detail, and the~~, and the new sewerage facilities to serve the Specific Plan at a programmatic level. The Board also approved the Newhall Ranch WRP under Conditional Use Permit No. 94-087-(5). The Newhall Ranch WRP is to provide treatment of the wastewater generated within the Specific Plan, as well as produce recycled water for the Specific Plan area.

The Newhall Ranch WRP's certified ~~project level~~ environmental analysis is found in Section 5.0 of the Newhall Ranch Revised Draft EIR (March 8, 1999) and Section 3.0 of the Newhall Ranch Revised Additional Analysis, Volume VIII (May 2003). Section 3.0 assessed and updated various Newhall Ranch WRP alternatives, including the approved Newhall Ranch WRP site.

The 1999 Newhall Ranch ~~Specific Plan Program~~ Revised Draft EIR and the 2003 ~~Newhall Ranch~~ Revised Additional Analysis contain Mitigation Measure SP 5.0-52, requiring formation of a county sanitation district for the Newhall Ranch Specific Plan area. This requirement also is included in the adopted Mitigation Monitoring Plan for the Newhall Ranch Specific Plan. Other mitigation measures (Mitigation Measures SP 5.0-22, and SP 5.0-55) require the Newhall Ranch WRP to be designed and operated in accordance with a National Pollutant Discharge Elimination System (NPDES) permit, to be obtained from the RWQCB, Los Angeles Region.

To fulfill these mitigation requirements and establish a logical plan for development of the new district and its infrastructure, the Newhall Land and Farming Company (Newhall) and the Sanitation Districts Nos. 36 and 32, later consolidated as the SCVSD, entered into the Interconnection Agreement, dated January 9, 2002.

~~On December 13, 2005, the County's Board adopted a resolution of intent to form the new district to be known as the Newhall Ranch County Sanitation District (NRSD). The Board also approved an Addendum to the Newhall Ranch EIR and Additional Analysis, which evaluated the environmental effects of NRSD formation. The Addendum determined that formation of the NRSD would not result in new or substantially more severe environmental impacts than those discussed in the prior Newhall Ranch environmental documents.~~

~~Thereafter, the County initiated proceedings for the formation of the NRSD, pursuant to the Cortese-Knox Hertzberg Local Government Reorganization Act of 2000. On June 14, 2006, the Local Agency Formation Commission (LAFCO) for Los Angeles County adopted a resolution approving formation of the NRSD. On July 27, 2006, LAFCO issued a Certificate of Completion for formation of the NRSD.~~

~~On January 18, 2011, the County's Board considered a resolution confirming formation of the NRSD. In doing so, the Board found that formation of the NRSD was within the scope of the previously certified Newhall Ranch EIR and Addendum.~~

The Interconnection Agreement ensures that the developer (Newhall) provides the necessary land and infrastructure for the logical development and implementation of the Newhall Ranch WRP. The Agreement was considered and approved by the District 26 and District 32 Boards at their January 9, 2002 meeting, which was noticed, the subject of an agenda, and open to the public in compliance with the Brown Act. Further, the Agreement was referenced in previous County staff reports supporting formation of the new NRSD (see, for example, Department of Public Works staff report to the Board of Supervisors, dated December 1, 2005, pages 3-4; and the Department's staff report to the Board, dated January 18, 2011, page 3, both of which are incorporated by reference).

As explained, the Interconnection Agreement sets conditions under which the first 6,000 homes in Newhall Ranch may temporarily discharge wastewater to the SCVSD's Valencia WRP. ~~The conditions include payment of the standard connection fee (fair share of the cost of the existing infrastructure) and transfer of title of the 22-acre Newhall Ranch WRP site to the NRSD. Newhall Ranch residents also would pay the SCVSD an annual service charge to recover the full cost of treating their wastewater at the Valencia WRP. Temporary treatment of wastewater at the Valencia WRP would not eliminate the need for the developer to finance and construct the Newhall Ranch WRP. Newhall, as the developer, must still construct the Newhall Ranch WRP and the new sewerage system within the Specific Plan area.~~

The Interconnection Agreement also specifies that Newhall must fund construction of the Newhall Ranch WRP, which is contemplated to be constructed in stages as the Specific Plan area is developed, and it sets conditions under which the first 6,000 homedwelling units in Newhall Ranch (i.e., the Mission Village and Landmark Village projects) may temporarily discharge wastewater to the Valencia WRP.

Temporarily treating wastewater from the first 6,000 Newhall Ranch homedwelling units at the Valencia WRP is a practical engineering decision based on the need to build up an adequate, steady flow of wastewater before starting up the Newhall Ranch WRP. The Interconnection Agreement does not impact the SCVSD's ability to comply with the chloride TMDL. As discussed ~~below~~, the Valencia WRP has available capacity for interim treatment of Landmark Village and Mission Village wastewater. The

SCVSD supports this interim action for these same reasons. (Please refer to the SCVSD's memorandum to the County Board of Supervisors, dated March 8, 2011. The memorandum and attachments are found in Appendix F4.22 of the Mission Village Final EIR ~~→(May 2011).~~)

On December 13, 2005, the County's Board adopted a resolution of intent to form the new district to be known as the NRSD. The Board also approved an Addendum to the Newhall Ranch EIR and Additional Analysis, which evaluated the environmental effects of NRSD formation. The Addendum determined that formation of the NRSD would not result in new or substantially more severe environmental impacts than those discussed in the prior Newhall Ranch environmental documents.

Thereafter, the County initiated proceedings for the formation of the NRSD, pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. On June 14, 2006, the Local Agency Formation Commission (LAFCO) for Los Angeles County adopted a resolution approving formation of the NRSD. On July 27, 2006, LAFCO issued a Certificate of Completion for formation of the NRSD.

On January 18, 2011, the County's Board considered a resolution confirming formation of the NRSD. In doing so, the Board found that formation of the NRSD was within the scope of the previously certified Newhall Ranch EIR and Addendum.

5. ENVIRONMENTAL AND REGULATORY SETTING

a. Existing/Baseline Environmental Conditions

The existing water quality in Santa Clara River Reach 5 is summarized in the Mission Village Draft EIR, Section 4.22, pages 4.22-38 through 4.22-48, and Appendix 4.22, ~~page 34.~~ Mission Village Water Quality Technical Report, page 34, as revised in Final EIR (October 2011), Appendix F4.22(A). Overall, the average chloride concentrations in Santa Clara River Reach 5 during recent dry weather monitoring conducted by Newhall for the Newhall Ranch WRP NPDES permitting process ranged between 97 mg/L and 140 mg/L. The average chloride concentration observed in monitoring data collected by Los Angeles County during wet weather in the Santa Clara River at The Old Road, just upgradient of the project location, was about 43 mg/L.

ab. Regulatory Background and History

(1) Chloride TMDL

As stated above, the RWQCB has developed and adopted an amended chloride TMDL. The chloride TMDL is part of the Basin Plan. Please see the Mission Village Final EIR (October 2011), Topical

Response 4: Revised Project Design, for further information regarding RWQCB's adoption of the chloride TMDL.

The RWQCB first adopted a TMDL for chloride in the Upper Santa Clara River in October 2002 (Resolution No. 2002-018). On May 6, 2004, the RWQCB amended the Upper Santa Clara River chloride TMDL to revise the interim wasteload allocations (WLAs) and implementation schedule (Resolution 04-004). The amended TMDL was approved by the State Water Resources Control Board (SWRCB), Office of Administrative Law, and the USEPA, and became effective on May 4, 2005. The chloride TMDL requires that chloride levels in WRP effluent not exceed 100 mg/L.

At the time the TMDL was adopted and approved, there were key scientific uncertainties regarding the sensitivity of crops to chloride and the complex interactions between surface water and groundwater in the Upper Santa Clara River watershed. The TMDL recognized the possibility of revised chloride water quality objectives (WQO) and included mandatory reconsiderations by the RWQCB to consider Site Specific Objectives (SSO). The TMDL required the County Sanitation Districts to implement special studies and actions to reduce chloride loadings from the Saugus and Valencia WRPs. The TMDL included the following special studies to be considered by the RWQCB:

- Literature Review and Evaluation (LRE) — review agronomic literature to determine a chloride threshold for salt sensitive crops.
- Extended Study Alternatives (ESA) — identify agricultural studies, including schedules and costs, to refine the chloride threshold.
- Endangered Species Protection (ESP) — review available literature to determine chloride sensitivities of endangered species in the Upper Santa Clara River.
- Groundwater and Surface Water Interaction Study (GSWI) — determine chloride transport and fate from surface waters to groundwater basins underlying the Upper Santa Clara River.
- Conceptual Compliance Measures — identify potential chloride control measures and costs based on different hypothetical WQO and final WLA scenarios.
- Site Specific Objectives and Antidegradation Analysis — consider a site specific objective for chloride based on the results of the agricultural chloride threshold study and the GSWI.

The TMDL special studies were conducted in a facilitated process in which stakeholders participated in scoping and reviewing the studies. This The chloride TMDL process resulted in an alternative TMDL implementation plan that addresses chloride impairment of surface waters and degradation of groundwater. The alternative plan, the AWRM, AWRMP (or the ACP), was first set forth by the Upper Basin water purveyors and United Water Conservation District (UWCD), the management agency for groundwater resources in the Ventura County portions of the Upper Santa Clara River watershed. The

~~AWRM program~~AWRMP increases chloride WQOs in certain groundwater basins and reaches of the ~~USCR~~Upper Santa Clara River watershed, decreases the chloride objectives in the eastern Piru Basin, and results in an overall reduction in chloride loading as well as water supply benefits²⁹.

The ~~AWRM program~~AWRMP, which is described in detail in the GSWI Task 2B-2 Report³⁰, consists of advanced treatment for a portion of the recycled water from the Valencia WRP; construction of a well field in the eastern Piru basin to pump out higher chloride groundwater; discharging the blended pumped groundwater and advanced treated recycled water to Reach 4A at the western end of the Piru basin at a chloride concentration not to exceed 95 mg/L; and conveyance of supplemental water and advanced treated recycled water to the Santa Clara River.

~~A GSWI model was developed to assess the linkage between chloride sources and instream water quality, and to quantify the assimilative capacity of Santa Clara River Reaches 4A, 4B, 5, and 6 and the groundwater basins underlying those reaches³¹. GSWI was then used to predict the effects of WRP discharges on chloride loading to surface water and groundwater under a variety of future hydrology, land use, and water use assumptions, including future discharges from the Newhall Ranch Specific Plan projects, in order to determine appropriate WLAs and load allocations. The GSWI model was used to assess the ability of the AWRM to achieve compliance with proposed conditional SSOs under future water use scenarios within the USCR watershed. The model was based on design capacities at Valencia WRP and Saugus WRP of 27.6 million gallons per day (mgd) and 6.5 mgd, for a total system design capacity of 34.1 mgd by year 2027³². The model predicted that the AWRM could achieve proposed conditional SSOs for chloride under both drought and non-drought conditions.³³~~

For further background information, please see RWQCB's November 24, 2008, staff report found in Appendix F4.22 of the Mission Village Final EIR (May 2011) (see, specifically, "Upper Santa Clara River Chloride TMDL Reconsideration and Conditional Site Specific Objectives for Chloride and Interim Wasteload Allocations for Sulfate and Total Dissolved Solids Staff Report," RWQCB, November 24, 2008).

²⁹ Los Angeles Regional Water Quality Control Board (LARWQCB), 2008. Upper Santa Clara River Chloride TMDL Reconsideration, Conditional Site Specific Objectives for Chloride, and Interim Wasteload Allocations for Sulfate and Total Dissolved Solids Staff Report. November 24, 2008.

³⁰ Geomatrix, 2008. Draft Task 2b-2 Report - Assessment of Alternatives for Compliance Options Using the Groundwater/Surface Water Interaction Model Upper Santa Clara River Chloride TMDL Collaborative Process.

³¹ ~~See footnote 1.~~

³² ~~See footnote 1.~~

³³ ~~See footnote 2.~~

(2) Valencia WRP NPDES Conditions and Operating Criteria

The SCVSD ~~is currently discharging~~ discharges tertiary-treated wastewater to the Santa Clara River from the Valencia WRP pursuant to Order No. R4-2009-0074 and NPDES Permit No. CA0054216.³⁴ The Valencia WRP has a current design capacity of 21.6 mgd and serves an estimated population of 162,661.³⁵

The Valencia WRP is part of the SCVSD's regional system that also includes the Saugus WRP. The regional system allows biosolids, solids, and excess influent flows from the Saugus WRP to be diverted to the Valencia WRP for treatment and disposal. The Valencia WRP currently receives wastewater from the City of Santa Clarita and unincorporated areas of Los Angeles County. The wastewater is a mixture of pretreated industrial and residential wastewater.

~~In order to comply with chloride TMDL~~ Recently, however, Ventura County and the Ventura County Agricultural Water Quality Coalition have expressed concerns to the RWQCB over a perceived lack of progress by the SCVSD for compliance with the chloride TMDL. The SCVSD responded to those claims by letter to the RWQCB, dated May 9, 2011 (a copy of this letter is presented in Final EIR (October 2011), Appendix F4.22(A)).

Pertinent excerpts from SCVSD's May 9, 2011 letter to the RWQCB are provided below:

"[T]he stakeholder-led process that developed the original ACP was based on the best available information at the time and was approved by the Regional Board under Resolution R4-2008-012. In the 2.5 years since then, water quality at the Los Angeles/Ventura County line where the beneficial use must be protected has been generally in compliance with the Site Specific Objective (SSO) for chloride of 117 mg/L (See [May 9, 2011 letter] Figure 2). This is especially remarkable given the fact that the period of 2007 through March 2011 was a drought.³⁶ This improvement can be attributed to removal of automatic water softeners and improved quality of imported water.

Historically, chloride levels in the Santa Clara River at this location have been much higher due in part to high levels of chloride in imported State Water Project deliveries

³⁴ Los Angeles Regional Water Quality Control Board, 2009. Order No. R4-2009-0074 (NPDES No. CA0054216), Waste Discharge Requirements for the Santa Clarita Valley Sanitation District of Los Angeles County, Valencia Water Reclamation Plant Discharge to Santa Clara River.

³⁵ Los Angeles Regional Water Quality Control Board, 2009. Fact Sheet for Order No. R4-2009-0074 (NPDES No. CA0054216), Waste Discharge Requirements for the Santa Clarita Valley Sanitation District of Los Angeles County, Valencia Water Reclamation Plant Discharge to Santa Clara River.

³⁶ In 2008, Governor Arnold Schwarzenegger signed Executive Order S-06-08, which proclaimed a condition of statewide drought beginning in 2007. In March 2011, Governor Jerry Brown issued a proclamation declaring the statewide drought at an end.

during drought periods. The local State Water Project (SWP) water wholesaler, the Castaic Lake Water Agency (CLWA) has provided new information regarding the assumptions of future water quality in imported SWP water. CLWA has indicated that changes in SWP operation due to recent Biological Opinions for the protection of endangered species (Wanger Decision) and completion of water banking programs have and will continue to result in lower peak chloride levels in the imported water delivered to the Santa Clarita Valley. This is evidenced in the data ([May 9, 2011 letter] Figure 3) which indicate that chloride levels in imported water were as high as 140 mg/L in 1987-1992, only reach the low 80's during the most recent drought (2007-2011). This indicates that some elements of the ACP may no longer [be] needed since the original ACP was designed to provide compliance with the Chloride TMDL assuming the worst observed conditions from the 1987-1992 drought that are not likely to repeat themselves....

The Sanitation District has already done considerable work in developing the preliminary elements of a Revised ACP for Regional Board and Ventura County stakeholder consideration. Immediately following the service charge hearings in July 2010, during which rates to support chloride reduction facilities were not approved, the Sanitation District met with CLWA and local water agencies in order to validate the predictions of improved future SWP water quality. The Sanitation District believes this will enable compliance with the SSOs adopted by the Regional Board in 2008 under future hydrological conditions and provide a similar level of water quality and water supply benefits as the original ACP, without the need for costly and energy-intensive advanced wastewater treatment facilities (Reverse Osmosis or RO). Elimination of RO from the ACP will also eliminate the need for associated brine disposal and RO permeate conveyance facilities. This will reduce the construction impacts and energy intensity of the compliance project. The Revised ACP is fully outlined in the Sanitation District's May 2, 2011 submittal to the Regional Board....

The Sanitation District continues to vigorously enforce the automatic water softener ban in an attempt to remove the remaining units. Furthermore, the Sanitation District is moving forward with an evaluation of future SWP water quality as suggested by the Regional Board. As you recall, the Sanitation District met with Regional Board staff to discuss conditions under which the Regional Board would consider new alternatives for compliance with the Chloride TMDL. The feedback received from the Regional Board indicated that any Chloride TMDL compliance alternative would have to provide similar benefits as the original ACP in order to justify water quality objectives in the range of the conditional SSOs adopted by the Regional Board in December 2008. The Regional Board also indicated additional scientific studies supporting the predicted improvements to future SWP water quality would be required in order for the Regional Board to consider revisions to the Chloride TMDL based on these predictions. Accordingly, the Sanitation District funded a study conducted by the CLWA to provide the required scientific basis to support the predictions of improved SWP water quality. In addition, the Santa Clarita Valley water agencies are evaluating changes in groundwater management practices that would limit chloride levels in the groundwater portion of the local water supply. In combination, these changes are likely to result in maximum chloride levels of 80-85 mg/L in the overall water supply to the community, which would enable the Sanitation District to meet the 2008 conditional SSOs through the Revised ACP proposed by the Sanitation District.

The Sanitation District expects the CLWA study to be completed by late summer 2011 and, if the results are favorable, the Sanitation District proposes to evaluate the Revised ACP using the GSWI Model and prepare SSO and anti-degradation studies in support. As discussed in the May 2, 2011 report, the Sanitation District proposes to confirm feasibility of the Revised ACP and establish revised regulatory requirements through a collaborative process. These steps would allow finalization of the Revised ACP, further development of the facilities plan, completion of associated CEQA analysis, and implementation of the final ACP....

[T]he SSOs adopted by the Regional Board were conditioned on implementation of the original ACP. The Chloride TMDL is clear in that if these criteria are not met, the existing water quality objectives in the Basin Plan revert back to 100 mg/L. Pending the results of the Sanitation District's studies, the Sanitation District has requested the Regional Board reopen the Chloride TMDL to incorporate the Revised ACP. This likely cannot happen until 2012 after the studies are completed and the Regional Board has reviewed them. Therefore, no action is required by the Regional Board to rescind the conditional SSOs adopted in 2008 at this time.

Further, the requests by Ventura County stakeholders to impose immediate effluent limits of 100 mg/L in the Sanitation District's NPDES permits is inappropriate as this would go far beyond the need to protect the beneficial uses of the river. The Literature Review Evaluation study conducted as part of the Chloride TMDL found that a protective range for salt sensitive agricultural crops from 100 – 117 mg/L for chloride in irrigation water. Chloride levels in the Sanitation District's Saugus and Valencia Water Reclamation Plant discharges are typically 15-20 mg/L higher than chloride levels in the Santa Clara River near the point of compliance. It is very clear that dilution occurs between the discharges and the point of use over the long term. Failing to consider this fact would result in overstringent regulation. Specifically, imposing effluent limits of 100 mg/L for the WRPs would require large expenditures of public funds without providing additional protection to beneficial uses. This would also result in substantially more environmental impacts associated with the construction of facilities to convey and dispose of brine and the greenhouse gas emissions from the energy needed to operate the necessary treatment and disposal facilities.

Compliance with a strict 100 mg/L chloride effluent limits requires implementation of advanced treatment facilities that would require considerable time for planning, design and construction. The Sanitation District could not immediately comply and would in fact need a time extension from the 2016 date contemplated in the Chloride TMDL for compliance with 100 mg/L. The original Chloride TMDL Implementation Schedule provided an eight-year period for the planning, design and construction of the required facilities. In 2006, the Regional Board reduced the Chloride TMDL implementation period but kept intact the eight-year period required for planning, design and construction of the required facilities. In 2008, the original ACP, which included a smaller-scale advanced treatment facility and local brine disposal, allowed the Chloride TMDL implementation schedule to be revised to include only six years for planning, design and construction of the required facilities. If the Regional Board requires 100 mg/L as an effluent limit, the Sanitation District will likely need eight years to comply....

The Sanitation District must ensure sufficient funding to maintain continued operation of its existing treatment facilities to protect public health and the environment. Due to the strong public opposition to raising service charge rates to pay for implementation of Chloride TMDL compliance projects, the Sanitation District declined to adopt any increase in service charge rates as necessary to cover existing operations and maintenance costs for its facilities. In order to ensure adequate funding for these costs, it was necessary to separate the rate increase necessary for these additional expenses to facilitate public understanding of the difference between the rate increases needed for existing facilities with the rate increases needed for Chloride TMDL compliance.

The Sanitation District fully understands the necessity of future rate increases to implement Chloride TMDL compliance measures. However, as the Sanitation District continues to work on developing the Revised ACP, there remains considerable uncertainty as to cost. The Sanitation District is unable to propose increased service charge rates until additional work is completed....

As indicated above, the Sanitation District has made considerable progress in reducing chloride levels in its WRP discharges to the Santa Clara River. As shown in [the May 9, 2011 letter] Figure 1, chloride levels in the Saugus and Valencia WRPs have been reduced from approximately 190 mg/L in 2002 down to approximately 125 mg/L in 2011, a decrease of approximately 65 mg/L. During the same period, chloride in SWP water averaged 83 mg/L in 2002 down to 72 mg/L in 2011, a decrease of only 11 mg/L. Much of the decrease in chloride levels is a direct result of the Sanitation District's efforts.

Additionally, chloride levels in SWP water during the most recent drought, 2007 to 2010, averaged approximately 75 mg/L, whereas chloride levels during the previous statewide drought, 1987 to 1992, averaged nearly 110 mg/L. CLWA has indicated that this is a result of changes in SWP operation due to recent Biological Opinions for the protection of endangered species (Wanger Decision) and completion of water banking programs along the SWP." (See May 9, 2011 letter, Attachment 1, pp. A1 through A-8.)

The above information sets forth the SCVSD's progress to date since the chloride TMDL was adopted. Based on the above, the SCVSD has provided estimates and time frames for completion of the work necessary in devising a revised ACP. These efforts are ongoing.

On May 27, 2011, the Los Angeles RWQCB issued administrative Notices of Violation to SCVSD regarding the Valencia and Saugus WRPs. The RWQCB notified SCVSD by letter that it was out of compliance with the administrative requirements established in Order Nos. R4-2009-0074 (Valencia WRP) and R4-2009-0075 (Saugus WRP) for not completing Task 17(a) in Attachment K of the Orders. Task 17(a) requires completion of a Wastewater Facilities Plan and programmatic EIR for facilities to comply with final permit effluent limits for chloride. The RWQCB's letters stated that the SCVSD was to respond in writing by June 27, 2011.

On June 27, 2011, the SCVSD responded in writing to the RWOCB. In the response, the SCVSD committed to complying with all applicable legal and regulatory requirements, including completing Task 17(a) of the Upper Santa Clara River Chloride TMDL implementation schedule by recommending to its Board of Directors at the next regularly scheduled Board meeting that staff prepare a Wastewater Facilities Plan and EIR for facilities to comply with a final effluent chloride limit of 100 mg/L at the point of discharge and begin design of the facilities. On July 26, 2011, the SCVSD Board of Directors approved the staff recommendation.

As part of the June 27 SCVSD response, and in an earlier May 2, 2011 letter to the RWOCB, SCVSD stated that it believes that an alternative compliance approach that incorporates facilities different from those facilities previously identified in the AWRMP, or ACP, which respond to changed chloride conditions as of 2011 would fully protect all designated beneficial uses in the Santa Clara River watershed. The changed conditions outlined in the SCVSD response include:

- Chloride levels in the Upper Santa Clara River have improved significantly since 2009, in part as a result of court-imposed pumping restriction on State Water Project (SWP) operations, coupled with implementation of groundwater banking and pump back operations along the SWP aqueduct. Peak SWP chloride concentrations at Castaic Lake during drought conditions have been reduced from historical values exceeding 100 mg/L to a current range of 80 – 85 mg/L.
- SCVSD has achieved a significant reduction of effluent chloride levels through the water softener renewal program. As a result of this program and the improved SWP water quality, effluent chloride levels have dropped approximately 70 mg/L since 2003. Further actions by the SCVSD, including a water softener ban enforcement program which has been initiated and the commitment to upgrade the Valencia and Saugus WRPs to ultraviolet disinfection, will further lower effluent chloride levels by 10 mg/L to 15 mg/L.
- Surface water chloride levels at the county line averaged 120 mg/L in 2009, the final year of a 4-year drought, 111 mg/L in 2010, and 101 mg/L as of May 2011. The Literature Review Evaluation for the Upper Santa Clara River identified a chloride level of 117 mg/L as protective of the salt-sensitive agricultural use.

The SCVSD believes that these changed conditions will show that it is more environmentally and economically sound to implement an alternative compliance approach, rather than facilities previously identified in the AWRMP or ACP, in meeting a 100 mg/L final effluent limit. As part of this effort, the SCVSD also intends to perform the modeling and scientific and technical studies necessary to demonstrate the adequacy of an alternative compliance approach and to request reopening of the chloride TMDL at a later time based on the analysis in those studies.

Nonetheless, the SCVSD has committed to immediately initiate efforts to complete a Wastewater Facilities Plan and EIR for facilities to comply with a final effluent chloride limit of 100 mg/L and begin

design of the facilities. The SCVSD also estimates that it will complete the Wastewater Facilities Plan and EIR by December 31, 2012.

In order to comply with the chloride TMDL and the final effluent chloride limit of 100 mg/L, the SCVSD will likely need to add facilities because existing treatment processes do not provide chloride removal. No decision has been made regarding how the SCVSD will achieve compliance with the chloride TMDL; however, the long-term compliance schedule established in RWQCB's revised chloride TMDL Resolution No. R4-2008-12 (December 11, 2008) allows time for attaining compliance.³⁷

4. — EXISTING CHLORIDE CONCENTRATION AT VALENCIA WRP

In the interim, at the October 4, 2011 public hearing concerning the Landmark Village project, Stephen Maguin, Chief Engineer, SCVSD, responded to Supervisor Antonovich's question as to whether the existing Valencia WRP could be temporarily used to treat the discharge from Newhall Ranch project wastewater until such time as the first phase of the Newhall Ranch WRP is constructed if SCVSD is operating under the administrative notices of violation. Mr. Maguin responded, stating that SCVSD may temporarily serve Newhall Ranch project wastewater (as anticipated by the Interconnection Agreement) and that the administrative notice of violation for the Valencia WRP was over the Wastewater Facilities Plan and associated EIR (CEQA document). Mr. Maguin added that there is no water quality violation currently occurring and that SCVSD is presently meeting with the RWQCB to resolve that notice of violation, but that it is unrelated to the recommended interim connection for the Newhall Ranch projects.³⁸

As stated above, the SCVSD will treat the wastewater from the first 6,000 dwelling units within the Specific Plan (up to 1.6 mgd) at the Valencia WRP, as needed, pursuant to the 2002 Interconnection Agreement. This treatment would occur until such time as the first phase of the Newhall Ranch WRP is constructed.

To address chloride in the Newhall Ranch Specific Plan wastewater discharges in the interim period, the applicant has committed to constructing chloride reduction facilities. Treated effluent from the Valencia WRP would be piped to the proposed demineralization site (using reverse osmosis or equivalent). Treated effluent would be piped back to the Valencia WRP and blended with treated effluent so that up

³⁷ The WLA-based final effluent limit for chloride becomes operative 11 years after the effective date of the Upper Santa Clara River Chloride TMDL (5/4/2016).

³⁸ Please see Meeting Transcript of the Los Angeles County Board of Supervisors, October 4, 2011, p. 40, which is available for public review and inspection upon request to the County Department of Regional Planning and incorporated by reference.

to approximately 6,000 dwelling units (approximately 1.6 mgd) of effluent generated by Newhall Ranch Specific Plan in the interim condition would be discharged at less than 100 mg/L for chloride. The brine by-product of the chloride reduction process would be piped within the project utility corridor north along The Old Road, west on Henry Mayo Drive, and north on Commerce Center Drive, to the brine disposal well facility, located in the Valencia Commerce Center, north of Castaic Creek. The piping north of the utility corridor along Commerce Center Drive also would be installed within the existing road right-of-way. The piping needed to transport effluent from the demineralization facility to the injection wells will be sized to the satisfaction of the SCVSD. The applicant has applied to USEPA for approval to construct the brine injection well facility. Please see the Mission Village Final EIR (October 2011), **Topical Response 4: Revised Project Design**, for a further description and analysis of the interim chloride reduction facilities.

6. EXISTING CHLORIDE CONCENTRATION AT VALENCIA WRP

The SCVSD completed a detailed and comprehensive study of the sources of chloride loading in the Santa Clarita Valley³⁹. Subsequently, the RWQCB and County Sanitation Districts staff analyzed chloride sources in the Upper Santa Clara River watershed⁴⁰. These analyses utilized mass balance techniques to identify and quantify chloride loads from imported water and residential, commercial, industrial, and WRP sources.

These reports found that the chloride in Valencia WRP effluent is comprised of two main sources: (1) chloride present in the potable water supply; and (2) chloride added by residents, businesses, and institutions in the Valencia WRP service area. Potable water in the Santa Clarita Valley is derived from two sources: imported water delivered under the State Water Project (SWP) and local groundwater. The chloride concentration in these two sources varies depending on a number of factors, most notably rainfall patterns. The chloride concentrations in Santa Clarita Valley water supplies that include SWP water are variable and, during times of extended dry weather or drought, exceed the 100 mg/L Basin Plan

³⁹ Sanitation Districts of Los Angeles County, *Santa Clarita Valley Joint Sewerage System Chloride Source Report*, October 2002. The year 2001 was used as a basis for the study.

⁴⁰ Los Angeles Regional Water Quality Control Board (LARWQB), 2008. Upper Santa Clara River Chloride TMDL Reconsideration, Conditional Site Specific Objectives for Chloride, and Interim Wasteload Allocations for Sulfate and Total Dissolved Solids Staff Report. November 24, 2008.

objective for the Santa Clara River. Chloride concentrations in Santa Clarita Valley water supplies ranged from 52 mg/L to 85 mg/L from 2002 to 2010⁴¹.

The chloride load added by users can be further divided into two parts: brine discharge from self-regenerating water softeners (SRWS) and all other loads added by users. Excluding chloride concentration in the water supply, non-SRWS sources of chloride include: residential, commercial, industrial, infiltration, and wastewater disinfection.

Based on the SCVSD's 2002 chloride source study, once this water was delivered to homes and businesses for interior use, the use of SRWS added an additional 78 mg/L of chloride concentration to the water supply before it was disposed of in the sewer for treatment. This high chloride addition suggested that source controls could be a significant means for improving water quality in the Santa Clara River. Based upon the results of the 2002 study, the SCVSD adopted an ordinance prohibiting the installation and use of new SRWS in 2003. Further, SCVSD implemented Automatic Softener Rebate Programs in 2005 (Phase I) and 2007 (Phase II), followed by the 2009 Ordinance that required removal and disposal of all SRWS installed in the SCVSD's service area. These efforts have resulted in significant reduction of chloride generated by SRWS. Based on the SCVSD's "2010 Chloride Source Identification/Reduction, Pollution Prevention, and Public Outreach Plan," (November 2010), concentration of chloride produced by SRWS was 6 mg/L in the SCVSD final effluent in the first half of 2010. SCVSD's goal is to completely eliminate SRWS from the SCVSD's service area.

Other residential sources of chloride include human waste, laundering, other cleaning activities, and swimming pool filter backwash; this loading adds approximately 22 mg/L of chloride in the SCVSD final effluent.⁴² The combined chloride load from commercial, industrial and hauled non-industrial waste represents approximately 7 percent of the overall chloride concentration in the SCVSD's final effluent (which corresponds to 10 mg/L chloride)⁴³. Disinfection practices at the SCVSD's Valencia WRP contribute about 12 mg/L, representing approximately 9 percent of the total effluent chloride concentration⁴⁴.

⁴¹ Sanitation Districts of Los Angeles County, *2010 Chloride Source Identification/Reduction, Pollution Prevention, and Public Outreach Plan*, November 2010, Table 3.9-2, pg.3-21.

⁴² Sanitation Districts of Los Angeles County, *2010 Chloride Source Identification/Reduction, Pollution Prevention, and Public Outreach Plan*, November 2010, Table 3.9-2, pg.3-21.

⁴³ Sanitation Districts of Los Angeles County, *2010 Chloride Source Identification/Reduction, Pollution Prevention, and Public Outreach Plan*, November 2010, Table 3.9-2, pg.3-21.

⁴⁴ Sanitation Districts of Los Angeles County, *2010 Chloride Source Identification/Reduction, Pollution Prevention, and Public Outreach Plan*, November 2010, Table 3.9-2, pg.3-21.

57. EXPECTED CHLORIDE CONCENTRATION IN MISSION VILLAGE AND LANDMARK VILLAGE WASTEWATER

The Mission Village and Landmark Village projects are expected to produce wastewater chloride concentrations similar to those in the existing SCVSD service area. The Mission Village and Landmark Village projects will not use SWP water, but will be supplied with local groundwater from the Alluvial aquifer with an average chloride concentration of 82 mg/L (concentrations ranging from 74 to 96 mg/L have been measured in E Wells⁴⁵), similar to the chloride concentrations in Santa Clarita Valley water supplies from 2002 to 2010.

As described in the Mission Village Draft EIR, Section 4.8, Water Service, the Mission Village project potable water demand would be met by the Valencia Water Company through the use of Newhall's rights to 7,038 afy of groundwater from the Alluvial aquifer, which is presently used by Newhall for agricultural irrigation. In addition, due to project conditions, the amount of groundwater that will be used to meet the potable demands of the Newhall Ranch Specific Plan, including the Mission Village ~~and Landmark Village projects~~ project, cannot exceed the amount of water historically and presently used by Newhall for agricultural uses. Therefore, no net increase in groundwater use will occur with implementation of this project pursuant to the Specific Plan.

If the Newhall Ranch WRP is not operating at the time of Mission Village project occupancy, the project's non-potable water demand would be met through the use of recycled water from the Valencia WRP. Accordingly, the proposed project's water demand would be met by relying on two primary sources of water supply, namely, Newhall's agricultural water supplies and recycled water supplied by the Newhall Ranch WRP or the existing Valencia WRP. Because these two independent water sources meet the water needs of the proposed project, no potable water would be needed from the existing or planned water supplies of the Castaic Lake Water Agency (CLWA), including imported water from CLWA's SWP supplies.

While the ~~Landmark~~ Mission Village and ~~Mission~~ Landmark Village projects are part of the potable water system for the entire Specific Plan, these projects would not rely on Nickel water to satisfy their potable water demands. As reported in the Newhall Ranch Revised Additional Analysis, Section 2.5, Water Resources (Volume VIII, May 2003), the Nickel water would only be needed on the Specific Plan site in years when the Newhall agricultural water has been used (i.e., 7,038 acre-feet per year), which is estimated to occur after approximately the 21st year of Newhall Ranch project construction.

⁴⁵ Mission Village Draft EIR, **Appendix 4.8** and **Appendix 4.10**.

Furthermore, Newhall is conditioned to prohibit "self-regenerating water softeners," or SRWS_z in Newhall Ranch and SCVSD staff will recommend that the NRSD enact a ban similar to the SRWS ban in Santa Clarita Valley. Thus, this significant source of chloride will not be present in the wastewater from the Mission Village and Landmark Village projects.

As shown in Mission Village Draft EIR, Section 4.9, Table 4.9-1 (Mission Village Wastewater Generation)_z, residential land uses will generate about 73 percent of the total wastewater generated and commercial land uses would generate the remaining 27 percent. Based on the chloride concentrations identified in the *2010 Chloride Source Identification/Reduction, Pollution Prevention, and Public Outreach Plan*, the overall chloride concentration in the Mission Village wastewater can be calculated as: (percent residential wastewater generated multiplied by residential concentration) ~~plus~~ (percent commercial wastewater generation multiplied by commercial concentration) ~~equals~~ total chloride concentration. The average chloride concentration in the Mission Village project's groundwater supply is approximately 82 mg/L⁴⁶, the non-SRWS residential chloride concentration is 31 mg/L (above water supply concentration)_z and the commercial concentration accounts for 33 mg/L above the water supply concentration_z⁴⁷. Given these parameters, the concentration of chloride in the Mission Village and Landmark Village interim wastewater discharges to the Valencia WRP would be about 113 mg/L⁴⁸. ~~As the same relative amount of residential and non-residential land uses are proposed for the Landmark Village project, its wastewater chloride concentration would be the same as that from the Mission Village project.~~⁴⁹ After consideration of the chloride concentration attributable to disinfection practices at the Valencia WRP (12 mg/L⁵¹), the Valencia WRP effluent concentration of treated Mission Village and Landmark Village wastewater would be approximately 125 mg/L.

In comparison, the average Valencia WRP effluent chloride concentration from 2000 through 2010 was 159 mg/L, with a maximum of 195 mg/L in 2003 and minimum of 128 mg/L in 2010_z⁵². Thus, the interim discharge of wastewater from the Valencia WRP due to the Mission Village and Landmark Village projects' wastewater would have similar chloride concentrations (assuming complete elimination of

⁴⁶ Mission Village Draft EIR, **Appendix 4.8** and **Appendix 4.10**.

⁴⁷ Sanitation Districts of Los Angeles County, *2010 Chloride Source Identification/Reduction, Pollution Prevention, and Public Outreach Plan*, November 2010, pg.3-14.

⁴⁸ ~~$[0.76*(82+31)] + [0.24*(82+33)] = 113.0 \text{ mg/L chloride}$~~

⁴⁹ $[0.76*(82+31)] + [0.24*(82+33)] = 113.0 \text{ mg/L chloride}$

⁵⁰ The concentration of chloride in the wastewater discharges for both Landmark Village and Mission Village are the same because the same relative amount of residential and non-residential land uses are proposed.

⁵¹ Sanitation Districts of Los Angeles County, *2010 Chloride Source Identification/Reduction, Pollution Prevention, and Public Outreach Plan*, November 2010, Table 3.9-2, pg.3-21.

⁵² Data provided by Santa Clarita Valley Sanitation Districts.

SRWS from SCVSD's service area), or would lower chloride concentrations in discharges from the Valencia WRP (if SRWS are not completely eliminated).

Thus, the interim discharge of wastewater from the Valencia WRP due to the Mission Village and Landmark Village projects' wastewater would have a less than significant impact on chloride in the Santa Clara River, because: (a) the discharge of wastewater from the Valencia WRP has been demonstrated to be similar as between the Mission Village and Landmark Village projects' wastewater and the wastewater from existing Santa Clarita Valley communities; (b) the use of the Valencia WRP for treatment of Mission Village and Landmark Village wastewater (i.e., first 6,000 dwelling units) would be temporary until construction of the Newhall Ranch WRP; and (c) the Valencia WRP has sufficient capacity to accommodate the interim wastewater discharge from the first 6,000 homesdwelling units from Newhall Ranch's Mission Village and Landmark Village projects (see below).

68. VALENCIA WRP CAPACITY

~~The Interconnection Agreement allows for interim wastewater discharges from up to 6,000 homes from the Newhall Ranch projects, which is equivalent to about 1.6 million gallons per day (mgd). Mission Village is projected to produce about 1 mgd and Landmark Village is projected to produce about 0.3 mgd, for a total of approximately 1.3 mgd, in the interim period before the Newhall WRP is built. The Valencia WRP treated approximately 15 mgd in 2010 and currently has a capacity of 21.6 mgd (yielding 6.6 mgd of surplus capacity)⁵³. Thus, the Valencia WRP has sufficient capacity to accommodate the interim processing of up to 1.6 mgd as outlined in the Interconnection Agreement.~~

~~The design capacity and expectations for future expansion are based on studies of regional growth conducted by the SCVSD. Connection permits are only issued if there is sufficient collection and treatment capacity. The SCVSD⁵⁴ routinely monitors system capacity and anticipated development to ensure sufficient capacity for approved developments. According to recent SCVSD flow projections based on Southern California Association of Governments (SCAG) Regional Transportation Plan, 2008, the previously approved Stage VI expansion at the Valencia WRP is not expected to be needed until approximately 2021 and the site buildout capacity of 34.2 mgd is not expected to be reached until~~

⁵³ ~~Comment letter on the Mission Village (TTM 061105) Draft EIR from the County Sanitation Districts of Los Angeles County, dated November 17, 2010.~~

⁵⁴ ~~The Santa Clarita Valley Sanitation District is a member of the Sanitation Districts and is the wastewater service provider for the City of Santa Clarita and some surrounding unincorporated county areas. The Santa Clarita Valley Sanitation District operates the Valencia WRP.~~

approximately 2033⁵⁵. However, because Mission Village and Landmark Village sewage will ultimately be treated at the Newhall Ranch WRP⁵⁶, the project is expected to have a less than significant impact on future expansion of SCVSD facilities.

The Valencia WRP currently delivers approximately 400 acre feet per year of recycled water to the Valencia Water Company that is used by its customers for irrigation of the Westridge Golf Course, and slopes and parkway medians. The Mission Village and Landmark Village projects will also utilize recycled water from the Valencia WRP for landscape irrigation until the Newhall WRP is operational. The combined Mission Village and Landmark Village projects recycled water demand is projected to be 1,579 acre feet per year, in comparison to the combined wastewater generation rate of 1,456 acre feet per year (1.3 mgd), a surplus demand of approximately 123 acre feet per year. The use of Valencia WRP effluent for irrigation will reduce the amount of groundwater pumping required for water supply in addition to reducing the quantity of Valencia WRP discharges that may require advanced treatment for chloride removal.

~~7. COST IMPLICATION FOR DISCHARGES TO VALENCIA WRP~~

~~Comments have requested information regarding the costs of water infrastructure and wastewater treatment process. While it is correct that the applicant will fund these required services, the Draft EIR is not the forum for addressing such costs. The funding of these services is not under the jurisdiction of Los Angeles County, and the provision for funding of mitigation measures does not itself create the prospect of a physical change to the environment and, therefore, is not a potentially significant effect on the environment requiring analysis under CEQA. (Pub. Res. Code, § 21060.5.) Consequently, this information is not required. However, responsive information is provided below.~~

~~When operating at flows equal to or below the permitted plant capacity, compliance with the chloride TMDL will depend on the chloride concentration in the treatment plant effluent. Local groundwater is the planned potable water source for the Specific Plan's Landmark and Mission Villages, the two developments whose wastewater would be temporarily treated at SCVSD's Valencia WRP under the Interconnection Agreement. The groundwater chloride levels for these two communities are similar to~~

⁵⁵—~~Comment letter on the Mission Village (TTM 061105) Draft EIR from the County Sanitation Districts of Los Angeles County, dated November 17, 2010.~~

⁵⁶—~~Due to gravitational limitations, a small portion of wastewater flow (0.27 mgd) from a portion of the Mission Village project area would be permanently treated at the Valencia WRP. Treatment of this flow from the Mission Village at the Valencia WRP will be subject to conditions specified in a Joint Sewerage Services Agreement to be executed between NRSB and the Santa Clarita Valley Sanitation District.~~

~~that of the groundwater used by existing Santa Clarita Valley communities. Thus, no difference in chloride concentration is expected due to the water supply.~~

~~In addition, like the Santa Clarita Valley, Mission Village and Landmark Village will be a mixture of residential and commercial land uses with little industry. Historically, use of SRWS in the Santa Clarita Valley was a significant chloride source for SCVSD wastewater prior to the ban on SRWS. Since the ban, a significant portion of the SRWS have been removed resulting in a marked drop in chloride levels in the wastewater. SCVSD intends to continue enforcement/removal efforts until essentially all SRWS are removed. Pursuant to Specific Plan Mitigation Measure 5.0 52, Newhall must request that NRS D also ban SRWS within the Newhall Ranch Specific Plan area. SCVSD's staff has confirmed that they will recommend that the NRS D enact an SRWS ban similar to the ban adopted in the SCVSD service area. Consequently, the Mission Village and Landmark Village communities are expected to produce similar overall wastewater chloride concentrations to the chloride concentrations in wastewater from the Santa Clarita Valley. Since final compliance will be determined by concentration, the addition of Newhall Ranch wastewater to the Valencia WRP would not impact the SCVSD's compliance with the chloride TMDL, nor add to the SCVSD's financial burden or cost to comply with the chloride TMDL.~~

~~Temporary use of SCVSD's Valencia WRP for treatment of Landmark Village and Mission Village wastewater also does not eliminate the requirement for the developer to construct the Newhall Ranch WRP or to finance the new sewerage system within the Specific Plan area. The developer must construct the Newhall Ranch WRP and have it operational before the next phase after Landmark Village and Mission Village. Temporary treatment of Landmark Village and Mission Village wastewater at SCVSD's Valencia WRP is a practical engineering decision based on the need to build up an adequate steady flow of wastewater before starting up the Newhall Ranch WRP.~~

8Please see the Mission Village Final EIR (October 2011), **Topical Response 4: Revised Project Design**, for a discussion and analysis of the Valencia WRP capacity, which is sufficient to temporarily treat the Newhall Ranch project wastewater at the Valencia WRP, as needed, until such time as the first phase of the Newhall Ranch WRP is constructed.

9. COST IMPLICATION FOR DISCHARGES TO VALENCIA WRP

Please see the Mission Village Final EIR (October 2011), **Topical Response 4: Revised Project Design**, for a discussion of the cost implications of the interim treatment of Newhall Ranch project wastewater at the Valencia WRP, as needed, until such time as the first phase of the Newhall Ranch WRP is constructed.

10. REFERENCED DOCUMENTS

The documents used in preparing this response, as referenced in the footnotes, are available for public review and inspection by upon request to the County's Department of Regional Planning and are incorporated by this reference.

Topical Response 6: Water Quality

Background

The Mission Village Draft EIR, Section 4.22, Water Quality, and Appendix 4.22, Mission Village Water Quality Technical Report, the *Newhall Ranch Specific Plan Sub-Regional Stormwater Mitigation Plan* Geosyntec, 2008 (“Sub-Regional Stormwater Mitigation Plan”) sets forth the urban runoff management program that would be implemented for the proposed project. As indicated in the Sub-Regional Stormwater Mitigation Plan, the Mission Village project incorporated Project Design Features (PDFs) to address water quality and hydrologic impacts. These PDFs include site design, low impact development (LID), source control, treatment control, and hydromodification control best management practices (BMPs).

Most of the BMPs will promote infiltration and recharge groundwater. To promote infiltration and groundwater recharge, the project design calls for clustering development within the Newhall Ranch Specific Plan area into villages. Approximately 74 percent (10,145 acres) of the Specific Plan area will remain undeveloped open space. LID BMPs that promote retention of urban runoff are included as PDFs. (See, Sub-Regional Stormwater Mitigation Plan and Mission Village Draft EIR, Section 4.22, Water Quality). However, the water quality modeling conducted for the impact analysis does not account for the stormwater runoff that would be retained in these LID BMPs.

In response to the Regional Water Quality Control Board comment letter, dated January 4, 2011, the applicant has selected LID BMPs that maximize on-site retention of runoff from the water quality design storm (i.e., the first 0.75 inch of precipitation). These BMPs include LID requirements similar to those in the Regional Board’s recently adopted Ventura County MS4 NPDES Permit (Order No. R4-2010-0108), even though the Ventura MS4 Permit does not apply to the Mission Village project, because it is located entirely within Los Angeles County.

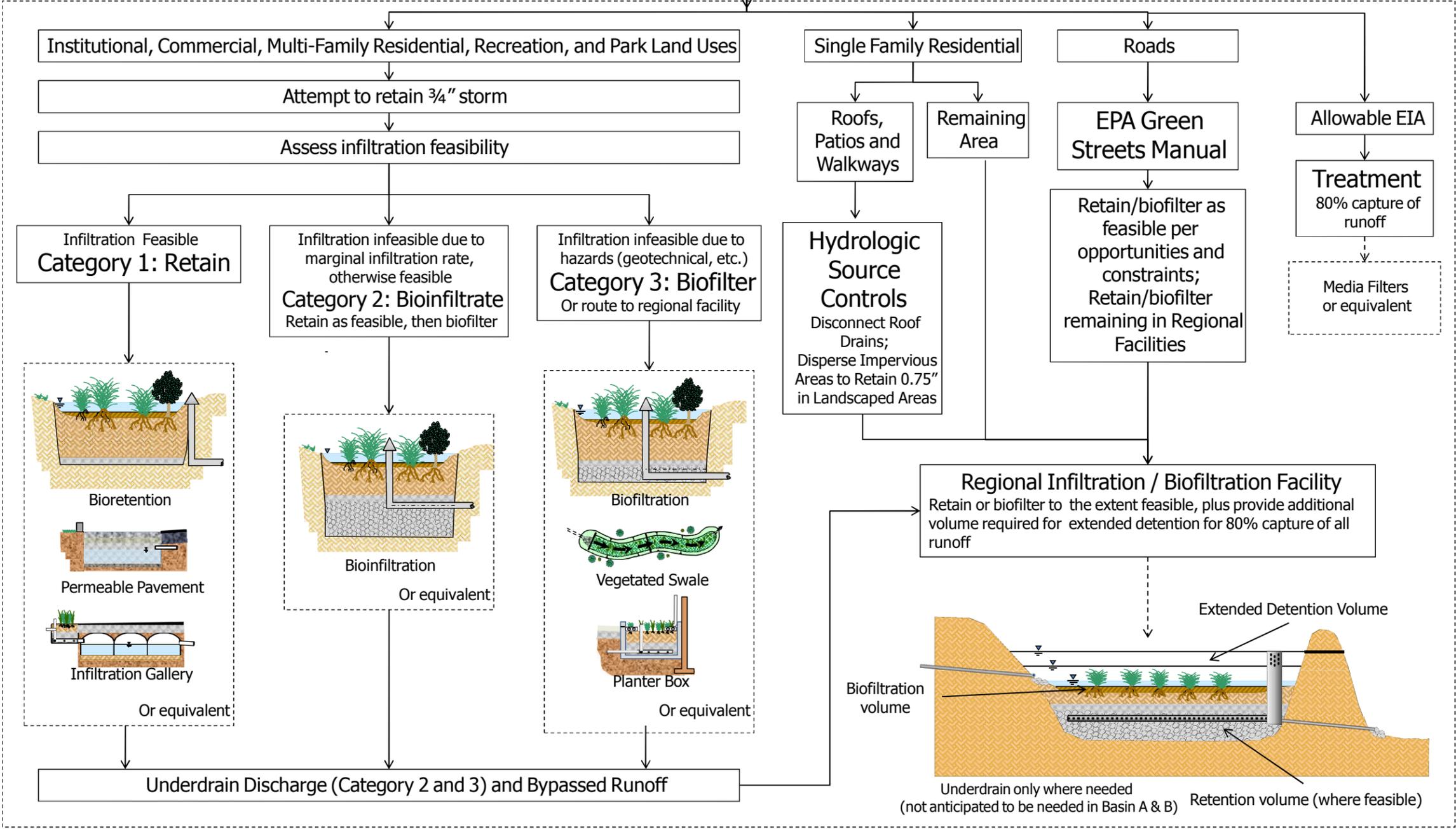
The revised Ventura County MS4 Permit requires that applicable projects reduce Effective Impervious Area (EIA) to less than or equal to five percent ($\leq 5\%$) of the total project area, unless infeasible. Impervious surfaces are rendered “ineffective” if the design storm volume is fully retained on the project site using infiltration, reuse, and/or evapotranspiration retention BMPs. Biofiltration BMPs may be used to achieve the 5% EIA standard if retention BMPs are technically infeasible, but must be sized to capture 150% of the design storm volume.

LID Performance Standard

A LID Performance Standard conceptually similar to the LID requirements in the Ventura County NPDES MS4 Permit has been developed and quantified for the project. The LID BMP Performance Standard is illustrated in **Figure 1** and described below:

MISSION VILLAGE LID PERFORMANCE STANDARD

LID project design features (PDFs) shall be selected and sized to retain the volume of stormwater runoff produced from a 0.75 inch storm event to reduce the percentage of Effective Impervious Area (EIA) to 5 percent or less of the total project area within the vesting tentative map project and associated off-site project area. Runoff from all EIA shall be treated with treatment control measures that are selected to address the pollutants of concern and are sized to capture and treat 80 percent of the average annual runoff volume.



SOURCE: Geosyntec Consultants – May 2011

FIGURE 1

2.0 Topical Responses, Comment Letters, and Responses to Comment Letters

LID project design features (PDFs) shall be selected and sized to: (1) fully retain the volume of stormwater runoff produced from a 0.75 inch storm event; and (2) reduce the percentage of Effective Impervious Area (EIA) to five percent or less of the total project area within the vesting tentative map and associated off-site project area. Runoff from all EIA shall be subject to treatment control measures that are selected to address the pollutants of concern and are sized to capture and treat 80 percent of the average annual runoff volume.

This LID Performance Standard will be implemented as follows:

1. Institutional, commercial, multi-family residential, recreation, and park land use parcels would implement retention or biofiltration BMPs on-site to the extent feasible. Based on an assessment of feasibility, one of three BMP strategies would be applied as outlined below:
 - a. *Infiltration feasible*: If it is feasible to infiltrate all of the developed area runoff produced from the 0.75 inch design storm (i.e., soil infiltration rates are at least 0.5 inches per hour, fill depth is less than 10 feet, and no infiltration geotechnical hazards exist (such as landslides and terrace escarpments)), infiltration BMPs would be used. Infiltration BMPs include bioretention (without an underdrain), permeable pavement, infiltration galleries, infiltration basins or trenches, or an equivalent infiltration BMP.
 - b. *Bioinfiltration allowable when infiltration rates or deep fill depths are present*: If the parcel has low soil infiltration rates (i.e., the soil infiltration rate is less than 0.5 inches per hour) or the depth of fill is greater than 10 feet, but no other technical infeasibility concerns exist, bioinfiltration BMPs would be used. Bioinfiltration facilities are similar to bioretention facilities with an underdrain, but they include storage below the underdrain to maximize the volume infiltrated. These facilities would retain a portion of the runoff from the design storm, then biofilter the remaining runoff from the design storm.
 - c. *Infiltration is not allowable*: If infiltration is technically infeasible due to geotechnical hazards or a high ground water table, then biofiltration BMPs would be used. These BMPs would biofilter the runoff produced from the design storm from the developed area.
2. Runoff from roofs, patios, and walkways in single family residential parcels would be distributed over landscaped areas designed to fully retain the volume of runoff from the 0.75 inch storm event. Runoff from the remaining parcel area and that which does not infiltrate in the landscaped area would flow through the storm drain system to the regional infiltration/biofiltration facilities.
3. Runoff from roadways would be retained or biofiltered in retention or biofiltration BMPs sized to capture the design storm volume or flow, per the guidance in U.S. Environmental Protection Agency's (USEPA) Managing Wet Weather with Green Infrastructure: Green Streets.
4. No more than 5% of the total Project area would be treated using conventional treatment methods that address the pollutants of concern. In this case, media filters (or equivalent BMPs that address the pollutants of concern) would be sized to capture and treat 80% of the average annual runoff volume from the allowable EIA.
5. Regional infiltration/biofiltration facilities also would be implemented. The regional facilities would be designed to incorporate a biofilter in the bottom of the facility, which would allow for infiltration

if feasible, with detention storage above the biofilter. The regional facilities would infiltrate or biofilter the design storm volume that has not been retained or biofiltered on the parcels in the area tributary to the regional facility. They also would provide extended detention treatment for the additional runoff volume required to provide 80 percent capture and treatment of the average annual runoff volume per the Newhall Ranch Specific Plan Sub-Regional Stormwater Mitigation Plan treatment performance standard.

Methodology

A load-based water quality model was used to estimate pollutant loads and concentrations in project area stormwater runoff for pre-development conditions and post-development conditions with the LID BMPs described above. This model was coupled with hydrologic and hydraulic modules of USEPA SWMM v4.4h to quantify the volume reduction and capture efficiency of the BMPs.

Table TR6-1 below provides a list of model inputs and the sources for these inputs. For further detail, please see Appendix B of the *Mission Village Water Quality Technical Report* (Draft EIR, Appendix 4.22) (the “MVWQTR”) and Final EIR, **Appendix F4.22**.

Table TR6-1: Model Input Requirements and Assumptions

Model Input	Assumption/Source
Hourly long-term rainfall record	<ul style="list-style-type: none"> National Climatic Data Center (NCDC) Newhall (046162) and San Fernando (047762) rain gauge data from 1969-2008
Green-Ampt soil parameters	<ul style="list-style-type: none"> Natural Resource Conservation Service Soil Data Mart Table 5.5.5 – Handbook of Hydrology (Maidment, ed. 2003)
Land use-based imperviousness	<ul style="list-style-type: none"> LA County Hydrology Manual (LACDPW, 2006)
Land use-based stormwater runoff event mean concentrations	<ul style="list-style-type: none"> Los Angeles County 1994-2000 Integrated Receiving Water Impacts Report, 2000 Los Angeles County 2000-2001 Stormwater Monitoring Report, 2001 Ventura County Watershed Protection District As analyzed for the Los Angeles Structural BMP Prioritization and Assessment Tool (LACDPW, City of Los Angeles, and Heal the Bay, 2008)
Volume and flow-based BMP design criteria	<ul style="list-style-type: none"> 80% Capture of Average Annual Runoff Volume (NRSP Sub-Regional SWMP (Geosyntec, 2008))

2.0 Topical Responses, Comment Letters, and Responses to Comment Letters

Model Input	Assumption/Source																											
BMP selection criteria	<ul style="list-style-type: none"> Select and locate BMPs with a preference for infiltration. Select BMPs to infiltrate the runoff volume from the 0.75-inch design storm to the extent feasible and biofilter the remaining fraction of the 80 percent capture volume. Evaluate degree of feasibility of infiltration based on land use type, native soil infiltration rate, proposed cut and fill, depth to groundwater, presence of landslides that will remain after remedial grading, and other geotechnically- or ecologically-based constraints. 																											
Volume reduction and LID BMPs analyzed quantitatively	<ul style="list-style-type: none"> Clustering (preservation of open space) Hydrologic source controls Distributed retention, bioinfiltration, and biofiltration BMPs Regional infiltration, bioinfiltration, and biofiltration facilities Media filters 																											
Volume reduction modeling parameters	<ul style="list-style-type: none"> Hydrologic source controls: equal ratio of disconnected of rooftops and patios to landscaped areas receiving disconnection Onsite BMPs: <table border="1" data-bbox="581 846 1336 1077"> <thead> <tr> <th>Feasibility Category</th> <th>Constraint</th> <th>Design infiltration rate (in/hr)</th> </tr> </thead> <tbody> <tr> <td>Category 1: Retention</td> <td></td> <td>0.38</td> </tr> <tr> <td>Category 2: Bioinfiltration</td> <td></td> <td>0.15</td> </tr> <tr> <td>Category 3: Biofiltration</td> <td></td> <td>0</td> </tr> </tbody> </table> Regional Facilities: <table border="1" data-bbox="581 1161 1336 1543"> <thead> <tr> <th>Feasibility Category</th> <th>Constraint</th> <th>Design infiltration rate (in/hr)</th> </tr> </thead> <tbody> <tr> <td>Category 1: Infiltration with Extended Detention</td> <td></td> <td>1.25</td> </tr> <tr> <td>Category 2: Bioinfiltration with Extended Detention</td> <td></td> <td>0.25</td> </tr> <tr> <td>Category 3: Biofiltration with Extended Detention</td> <td></td> <td>0</td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table> 	Feasibility Category	Constraint	Design infiltration rate (in/hr)	Category 1: Retention		0.38	Category 2: Bioinfiltration		0.15	Category 3: Biofiltration		0	Feasibility Category	Constraint	Design infiltration rate (in/hr)	Category 1: Infiltration with Extended Detention		1.25	Category 2: Bioinfiltration with Extended Detention		0.25	Category 3: Biofiltration with Extended Detention		0			
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Category 3: Biofiltration with Extended Detention		0																										
LID BMP effluent quality	<ul style="list-style-type: none"> ASCE/USEPA (American Society of Civil Engineers Urban Water Resources Research Council and United States Environmental Protection Agency) 2011, International Stormwater Best Management Practices Database (www.bmpdatabase.org); (Reanalysis of expanded database conducted January 2011) 																											

The land use areas analyzed for this response are listed in **Table TR6-2** below and illustrated in **Figure 2**. These land use areas are for the revised project description included in the Final EIR. Please see **Topical Response 4: Revised Project Design**.

Table TR6-2: Summary of Scenarios Analyzed

Land Use Designation	Mission Village Project (Acres)
Commercial	76.3
School	9.5
Multi-Family Residential	237.7
Single Family Residential	124.6
Park	29.7
Recreation	11.8
Open Space	655.0
Water Quality Basin	18.8
Road	98.4
Tract Map Total	1261.8
Off-site Commercial (Water Tanks)	2.1
Off-site Water Quality Basin	6.1
Off-site Road	25.4
Total Area	1295.4

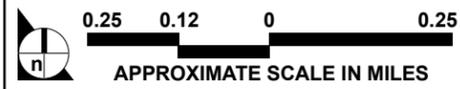
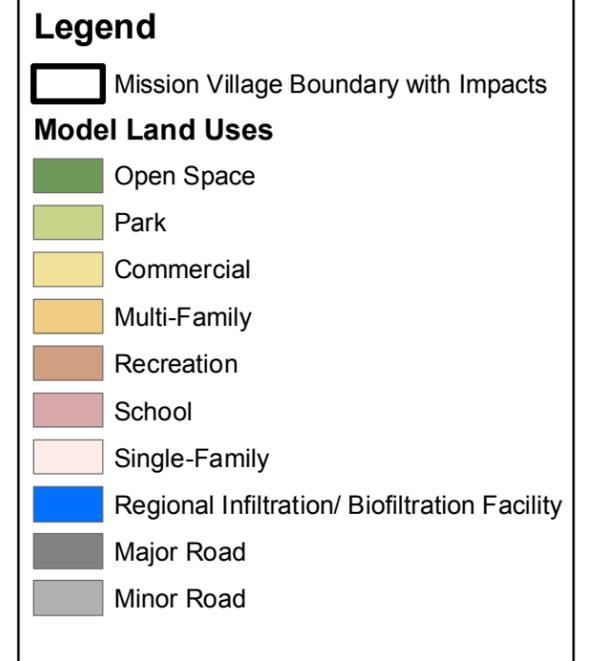
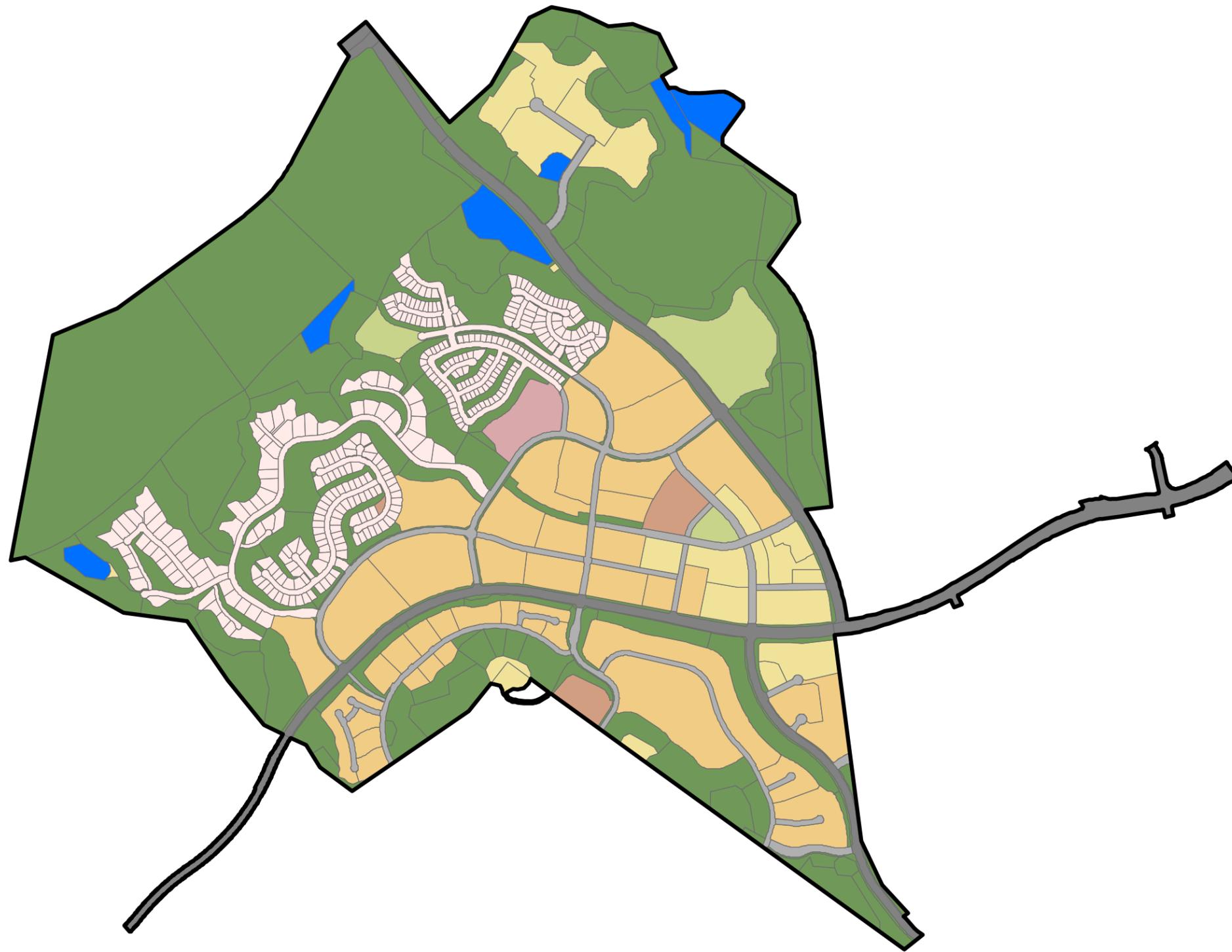
Results

LID Feasibility Screening for the Project Area

A feasibility assessment was conducted for the project area to determine which of three BMP strategies could be applied on site and whether the regional infiltration/biofiltration facilities would allow for infiltration. This analysis was performed using spatial data processing for infiltration feasibility using the criteria listed below:

Locations where seasonal high groundwater is 10 feet or more from the surface;

- Locations with no potential geotechnical hazards;
- Locations with soil infiltration rates at least 0.5 inches per hour;
- Locations with fill depths less than 10 feet.



SOURCE: Geosyntec Consultants – February 2011

FIGURE 2



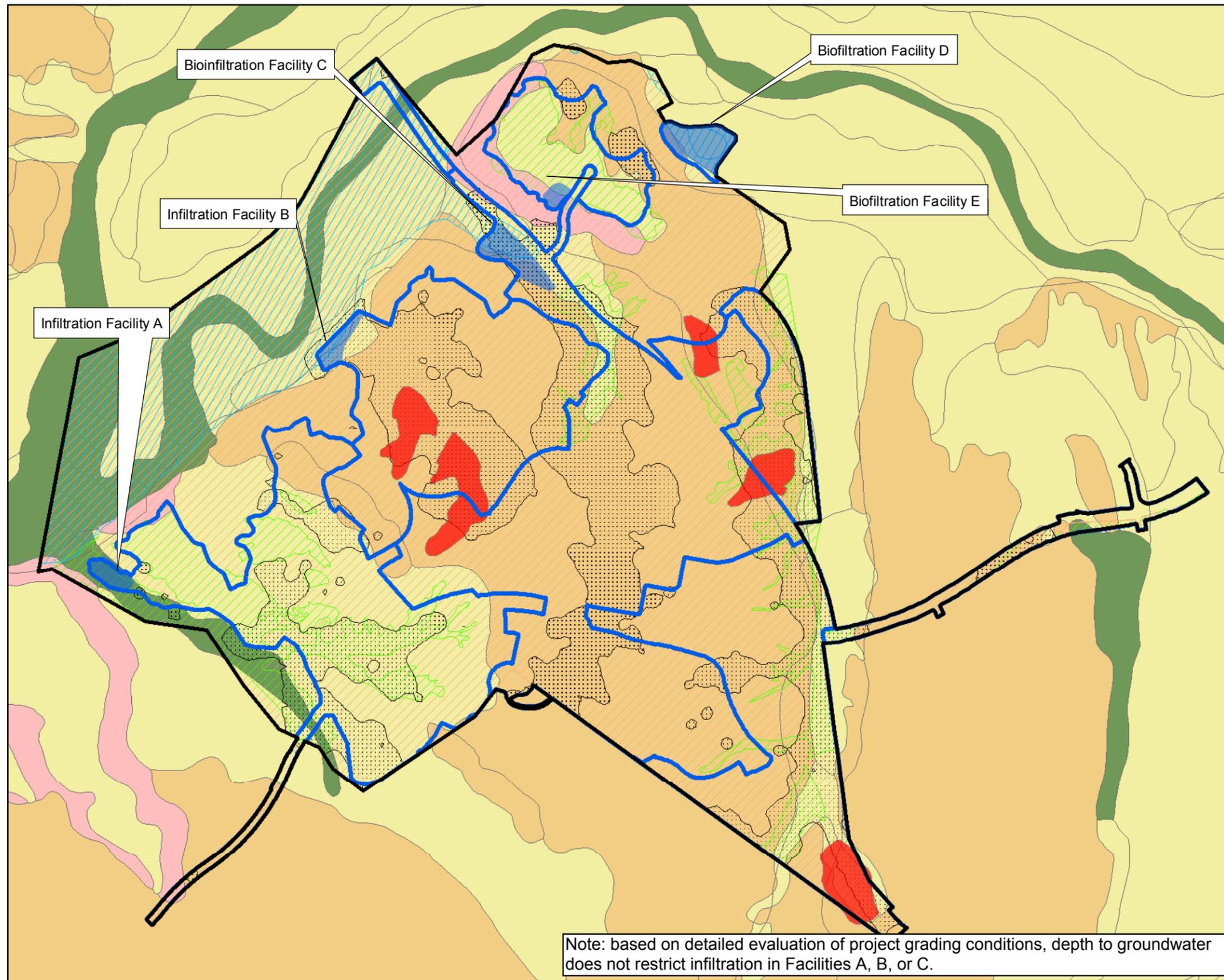
The results of this feasibility screening are shown in **Figure 3**. **Figure 4** illustrates the LID BMPs for the Mission Village project area based on the feasibility screening.

Project Impact Assessment for Modeled Pollutants of Concern

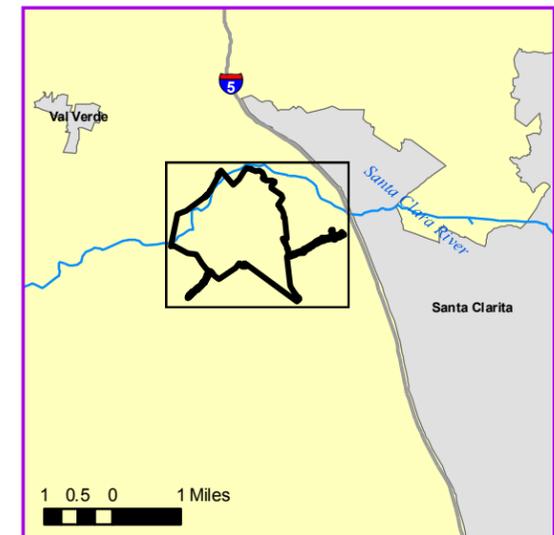
Table TR6-3, below, shows the predicted changes in project stormwater runoff volume and mean annual loads for the modeled pollutants of concern. **Table TR6-4**, below, shows the predicted changes in concentration in stormwater runoff for the project area.

Table TR6-3: Predicted Average Annual Runoff Volume and Pollutant Loads

Parameter	Units	Existing Conditions	Developed Conditions with no BMPs	Developed Conditions w/ LID	Change w/LID
Volume	acre-ft	153	671	408	255
TSS	tons/yr	50	60	18	-32
Total Phosphorus	lbs/yr	196	585	189	-7
Nitrate-N + Nitrite-N	lbs/yr	647	2,153	603	-44
Ammonia-N	lbs/yr	177	998	203	26
Total Nitrogen	lbs/yr	1,550	5,860	1,830	280
Chloride	tons/yr	2	20	13	11
Dissolved Copper	lbs/yr	4	21	7	3
Total Lead	lbs/yr	5	12	4	-1
Dissolved Zinc	lbs/yr	104	180	49	-55
Dissolved Aluminum	lbs/yr	115	218	139	24
Total Aluminum	lbs/yr	567	1,176	353	-224



Note: based on detailed evaluation of project grading conditions, depth to groundwater does not restrict infiltration in Facilities A, B, or C.



Legend

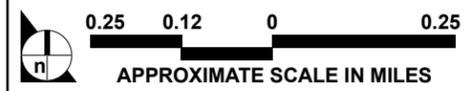
- Mission Village Boundary with Impacts
- Regional Facility Watershed Boundaries
- Regional Infiltration/ Biofiltration Facilities
- Mapped Geotechnical Hazard*
- Seasonal High Groundwater Table < 10 ft BGS
- Net Proposed Depth of Fill > 10 ft
- Natural, Undisturbed Soil Infiltration Rate ≥ 0.5 in/hr
- Natural, Undisturbed Soil Infiltration Rate < 0.5 in/hr

Hydrologic Soil Group

- A
- B
- C
- D
- Other

* Hazard left partially or entirely in place after remedial grading.

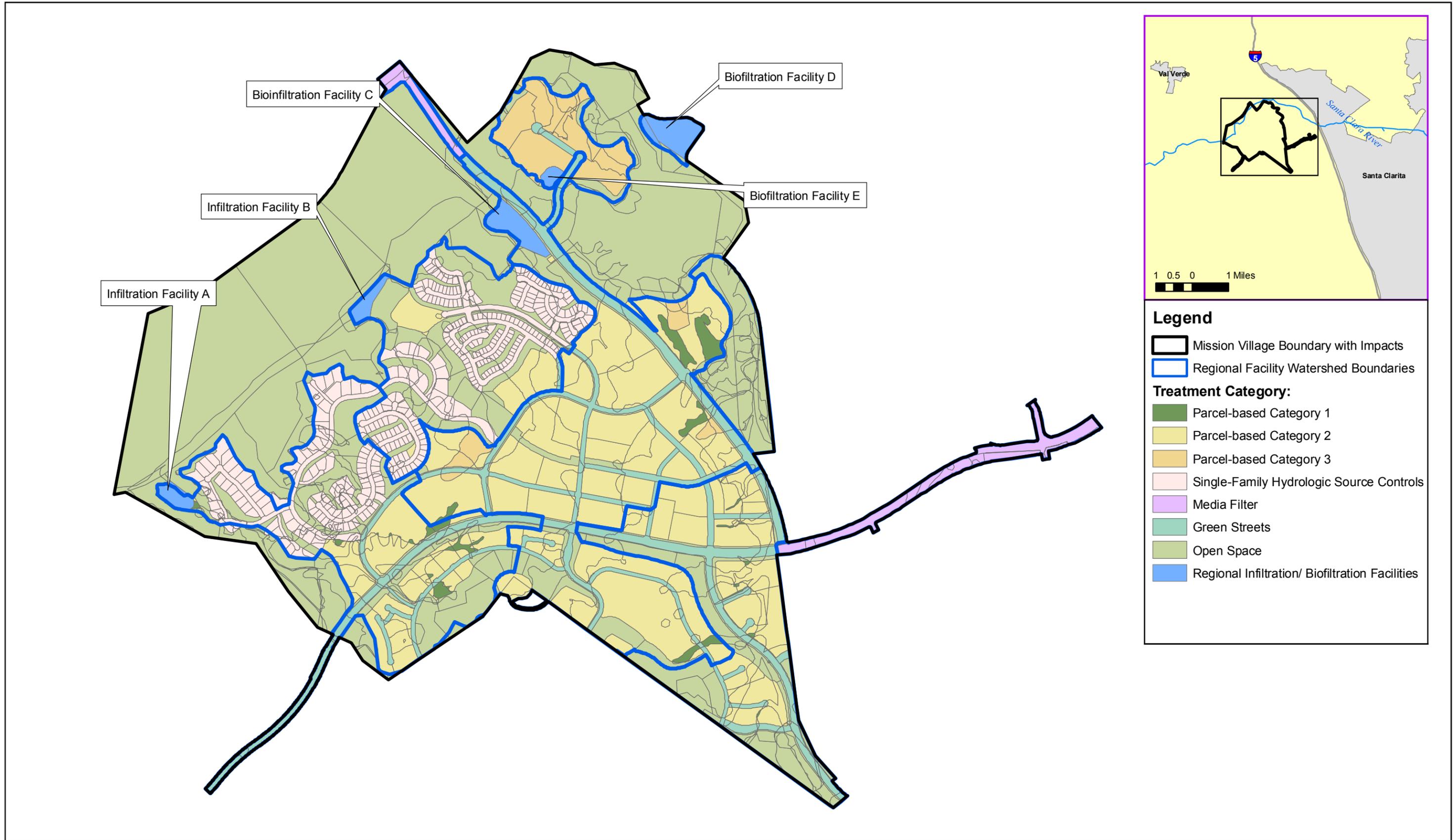
Note: based on detailed evaluation of project grading conditions, depth to groundwater does not restrict infiltration in Facilities A, B, or C.



SOURCE: Geosyntec Consultants – February 2011

FIGURE 3

Mission Village Infiltration Feasibility Screening



SOURCE: Geosyntec Consultants – February 2011

FIGURE 4

Table TR6-4: Predicted Average Annual Pollutant Concentrations

Parameter	Units	Existing Conditions	Developed Conditions with no BMPs	Developed Conditions w/ LID	Change w/LID
TSS	mg/L	238	66	28	-210
Total Phosphorus	mg/L	0.47	0.32	0.16	-0.31
Nitrate-N + Nitrite-N	mg/L	1.5	1.2	0.5	-1.0
Ammonia-N	mg/L	0.46	0.55	0.16	-0.30
Total Nitrogen	mg/L	3.8	3.2	1.5	-2.3
Chloride	mg/L	12	22	23	11
Dissolved Copper	µg/L	10.5	11.4	6.4	-4.1
Total Lead	µg/L	12.5	6.7	3.0	-9.5
Dissolved Zinc	µg/L	282	100	41	-241
Dissolved Aluminum	µg/L	297	120	128	-169
Total Aluminum	µg/L	1,430	646	328	-1,102

Even with LID design features and BMPs, the project would result in increased runoff volume; ammonia, total nitrogen, dissolved copper, chloride, and dissolved aluminum loads. Chloride concentrations are predicted to increase as well. However, with LID PDFs and BMPs, total suspended solids (TSS), total phosphorous, nitrate-N + nitrite-N, total lead, dissolved zinc, and total aluminum loads would decrease, when compared to existing conditions, as would concentrations of all modeled constituents except chloride. The increase in runoff volume results from the increase in impervious surfaces at the site, as well as from reduced infiltration capacity due to compaction of site soils during construction. The change in pollutant concentrations can be attributed to the proposed shift in land uses – i.e., from agricultural and open space land uses (existing condition at the site) compared with urban land uses (post-development conditions) in combination with the reductions in concentration achieved in the LID and biofiltration BMPs. Change in pollutant load is a function of the increase in runoff volume and the relative change in pollutant concentration; if the predicted reduction in pollutant concentration is small, then the predicted runoff load of that pollutant may increase.

The predicted average annual TSS, nutrients, and chloride concentrations in stormwater runoff from the total modeled Project area are compared to water quality criteria in **Table TR6-5** below. Although loads of ammonia and total nitrogen are predicted to increase with development, the concentrations of these pollutants are predicted to decrease and to be below the Basin Plan water quality objectives (WQOs) and

total maximum daily load waste load allocation (TMDL WLAs) benchmark criteria because of the change in land uses and the implementation of LID and treatment control BMPs. Concentrations and loads of chloride are predicted to increase, but are well below the benchmark criteria. Concentrations and loads of TSS, total phosphorus, and nitrate-nitrogen plus nitrite-nitrogen are predicted to decrease and to be below benchmark criteria. In addition, all predicted concentrations are within the observed range of concentrations within Santa Clara River Reach 5. Based on the comprehensive LID implementation strategy, the predicted decrease in runoff concentrations, and the comparison with benchmark criteria and instream concentrations, water quality impacts related to TSS, nutrients, and chloride would be less-than-significant with implementation of the LID BMPs.

Table TR6-5: Comparison of Predicted TSS, Nutrient, and Chloride Concentrations for the Mission Village Project Area with Water Quality Objectives, TMDLs, and Observed Concentrations in Santa Clara River Reach 5

Pollutant	Predicted Average Annual Concentration w/LID (mg/L)	Basin Plan Water Quality Objectives (narrative or mg/L)	Wasteload Allocations for MS4 Discharges into the Santa Clara River Reach 5 (mg/L)	Range of Observed¹ Concentrations in Santa Clara River Reach 5 (mg/L)	Average Wet Weather² Concentration at Station S29 (Days > 0.1")
TSS	28	Water shall not contain suspended or settleable material in concentrations that cause nuisance or adversely affect beneficial uses	NA	32 – 51,200	1,060
Total Phosphorus	0.16	Waters shall not contain biostimulatory substances in concentrations that promote	NA	0.18 – 13.4	0.58

2.0 Topical Responses, Comment Letters, and Responses to Comment Letters

Pollutant	Predicted Average Annual Concentration w/LID (mg/L)	Basin Plan Water Quality Objectives (narrative or mg/L)	Wasteload Allocations for MS4 Discharges into the Santa Clara River Reach 5 (mg/L)	Range of Observed ¹ Concentrations in Santa Clara River Reach 5 (mg/L)	Average Wet Weather ² Concentration at Station S29 (Days > 0.1")
Total Nitrogen	1.5	aquatic growth to the extent that such growth causes nuisance or adversely affects beneficial uses	NA	<0.04 – 46 ⁶	4.4
Nitrate-N + Nitrite-N	0.5	5	6.8 ³	0.5 – 4.8	0.9
Ammonia-N	0.16	2.2 ⁴	1.75 ⁵	<0.005 – 1.1	0.20
Chloride	23	100	100	3 - 121	43

¹ Range of concentrations observed in the Santa Clara River during wet weather (Stations S29, NR1, and NR3).

² Average concentration observed in wet weather monitoring data at Station S29 for all storm events greater than 0.1 inches.

³ 30-day average.

⁴ 4-day average, ELS present, 90th percentile pH and temperature pairing observed at USGS Monitoring Station 11108500.

⁵ 30-day average in Reach 5 below Valencia.

⁶ Observed values for TKN (ammonia plus organic nitrogen).

Comparison of the predicted runoff metal concentrations and the acute California Toxics Rule (CTR) criteria for dissolved copper, total lead, dissolved zinc, and total aluminum are shown in **Table TR6-6** below. The comparison of the post-developed with LID condition to the benchmark CTR values shows that all of the trace metal concentrations are predicted to be below the benchmark water quality criteria. Predicted trace metals concentrations are within the range of observed concentrations in Santa Clara River Reach 5, except for dissolved zinc, which is slightly above the range of observed concentrations.

There is no CTR criterion for aluminum, although there is a National Ambient Water Quality Criteria (NAWQC) criterion (750 µg/L (acute) for a pH range of 6.5 to 9.0) in the form of acid soluble aluminum (USEPA, 1988). It is not possible to directly compare the predicted aluminum concentration to this

criterion, as the available monitoring data used for modeling are for either dissolved aluminum or total aluminum. Acid soluble aluminum (which is operationally defined as the aluminum that passes through a 0.45 µm membrane filter after the sample has been acidified to a pH between 1.5 and 2.0 with nitric acid) represents the forms of aluminum toxic to aquatic life or that can be converted readily to toxic forms under natural conditions. The acid soluble measurement does not measure forms of aluminum that are included in total aluminum measurement, such as aluminum that is occluded in minerals, clays, and/or is strongly adsorbed to particulate matter, which are not toxic and are not likely to become toxic under natural conditions. The predicted mean total aluminum concentration is less than the NAWQC benchmark criterion for acid soluble aluminum, is predicted to decrease in the post-development condition, and is within the range of observed concentrations in Santa Clara River Reach 5.

Based on the comprehensive LID implementation strategy, the predicted decrease in runoff concentrations, and the comparison with benchmark objectives and instream concentrations, water quality impacts related to metals would be less-than-significant with implementation of the proposed LID BMPs.

Table TR6-6: Comparison of Predicted Trace Metal Concentrations for the Mission Village Project Area with Water Quality Criteria and Observed Concentrations in Santa Clara River Reach 5

Metal	Predicted Average Annual Concentration w/LID (µg/L)	California Toxics Rule Criteria ¹ (µg/L)	Range of Observed ² Concentrations in Santa Clara River Reach 5 (µg/L)	Average Wet Weather ³ Concentration at Station S29 (Days > 0.1")
Dissolved Copper	6.4	32	3.3 – 22.6	7.3
Total Lead	3.0	260	0.6 – 40	18
Dissolved Zinc	41	250	3 – 37	19
Total Aluminum	328	N/A	131 – 19,650	5,500

¹ Hardness = 250 mg/L, based on minimum observed value at USGS Station 11108500. Lead criteria is for total recoverable lead. There is no CTR criterion for aluminum.

² Range of concentrations observed in the Santa Clara River during wet weather (Stations S29, NR1, and NR3).

³ Average concentration observed in wet weather monitoring data at Station S29 for all storm events greater than 0.1 inches.

Assessment of Potential Project Impacts on Instream Concentrations

The potential for project runoff to impact instream pollutant concentrations is a function of: (1) the relative magnitudes of runoff volume and instream flow volume; and (2) the relative magnitude of runoff concentrations and instream concentrations. The instream pollutant concentration with project contributions can be calculated using a simple mass balance equation:

$$C_{IS} = \frac{V_O \times C_O + V_P \times C_P}{V_O + V_P} \quad \text{Equation 1}$$

Where:

C_{IS} = Instream Concentration with Project Runoff

V_O = Instream Volume Upstream of Project

C_O = Instream Concentration Upstream of Project

V_P = Volume of Runoff from Project Area

C_P = Concentration of Runoff from Project Area

This relationship can also be expressed as:

$$C_{IS} = \frac{L_O + L_P}{V_O + V_P} \quad \text{Equation 2}$$

Where:

L_O = Instream Constituent Load Upstream of Project

L_P = Constituent Load in Runoff from Project Area

Based on these relationships, two universal conditions can be identified under which a project would not increase instream concentration:

- **Condition 1:** If the concentration of a constituent in project runoff (C_P) is less than the concentration of the constituent instream (C_O), then discharges from the project would result in a reduction of the instream concentration of that constituent; it would not be possible for the project's discharges to cause an increase in the instream concentration. Two extreme cases can be used to demonstrate this statement:
 - a. First, given that C_P is less than C_O , take the case where V_P is much less than V_O (e.g., the project size is small relative to the size of the watershed). In this case, the instream concentration, after receiving project runoff, would effectively equal C_O , although slightly less, indicating effectively no change in the instream concentration as a result of the project's discharges.

- b. Given that C_P is less than C_O , take the case where V_P is much greater than V_O (the project size is very large relative to the size of the watershed). In this case, the instream concentration, after receiving project runoff, would effectively equal C_P , indicating that the project would reduce instream concentration because C_P is less than C_O .
- **Condition 2:** If the load of a constituent in project runoff (L_P) decreases with development, but the volume of runoff from the project increases (V_P), then the project would be expected to result in a reduction of the instream concentration of that constituent regardless of instream volumes or concentrations. It would be impossible for the project to result in an increase in the instream concentration by reducing load but adding volume. In equation 2, this would effectively increase the numerator while reducing the denominator, which must cause the instream concentration to decrease.

The comparison project concentrations under post-developed conditions with LID implementation to the existing instream concentrations shows that all pollutant concentrations in the project's runoff, except dissolved zinc, are predicted to be below the average wet-weather instream concentration (Condition 1). On this basis, the project would be expected to result in a reduction in the instream concentrations of these constituents.

Based on predicted changes in loads and volumes as a result of the project with LID (Table TR6-3), the average annual load of dissolved zinc is predicted to go down with development, while runoff volumes are predicted to increase (Condition 2). On this basis, the project would be expected to result in a reduction in the instream concentrations of dissolved zinc.

Cumulative Impact Assessment for LID Implementation

The MVWQTR evaluates cumulative impacts for the unincorporated area of Los Angeles County west of The Old Road to the Los Angeles County/Ventura County line. This geographic area includes the Newhall Ranch Specific Plan, Entrada, Legacy Village, and the remaining unbuilt portions of the Valencia Commerce Center. The LID Performance Standard described above also would be implemented by the other Specific Plan villages and the Entrada, Legacy Village, and Valencia Commerce Center projects.

The combined effect of LID implementation on modeled pollutant loads and concentrations of the Newhall Ranch Specific Plan, Entrada, Legacy Village, and the Valencia Commerce Center proposed projects are summarized in Tables TR6-7 and TR6-8 below, respectively. As shown in Table TR6-7, when considered cumulatively, runoff volumes and loads of ammonia, dissolved copper, dissolved aluminum, and chloride are predicted to increase from the Newhall Ranch Specific Plan, Entrada, Legacy Village, and Valencia Commerce Center projects, while pollutant loads are expected to decrease for TSS, total phosphorus, nitrate-N + nitrite-N, total nitrogen, total lead, dissolved zinc, and total aluminum. Pollutant concentrations from the combined projects are predicted to decrease for all modeled parameters (Table TR6-8). Increases in pollutant loadings are not anticipated to be significant based on the fact that

predicted pollutant concentrations are well below benchmark water quality standards and TMDL wasteload allocations and are primarily within the range of observed concentrations in Santa Clara River Reach 5 (Table TR6-9).

Table TR6-7: Predicted Average Annual Combined Runoff Volume and Pollutant Loads for the NRSP, Legacy Village, Entrada, and Valencia Commerce Center Projects

Modeled Parameter	Units	Development Condition			Change
		Existing	Developed with no BMPs	Developed with LID	
Volume	acre-ft	1,500	4,900	3,400	1,900
TSS	tons/yr	650	650	340	-310
Total Phosphorus	lbs/yr	5,500	4,300	1,800	-3,700
Nitrate-N	lbs/yr	16,000	13,700	6,100	-9,900
Nitrite-N	lbs/yr				
Ammonia-N	lbs/yr	1,900	7,500	2,100	200
Total Nitrogen	lbs/yr	25,000	44,000	19,000	-6,000
Chloride	tons/yr	43	135	88	45
Dissolved Copper	lbs/yr	32	130	55	23
Total Lead	lbs/yr	42	102	40	-2
Dissolved Zinc	lbs/yr	400	1,110	390	-10
Dissolved Aluminum	lbs/yr	640	1,800	1,260	620
Total Aluminum	lbs/yr	6,300	10,400	5,400	-900

Table TR6-8: Predicted Average Annual Combined Pollutant Concentrations for the NRSP, Legacy Village, Entrada, and Valencia Commerce Center Projects

Modeled Parameter	Units	Development Condition			Change
		Existing	Developed with no BMPs	Developed with LID	
TSS	mg/L	330	100	70	-260
Total Phosphorus	mg/L	1.4	0.3	0.2	-1.2
Nitrate-N	mg/L	4.0	1.0	0.7	-3.3
Nitrite-N	mg/L				
Ammonia-N	mg/L	0.5	0.6	0.2	-0.3
Total Nitrogen	mg/L	6	3	2	-4
Chloride	mg/L	22	20	19	-3
Dissolved Copper	µg/L	8	10	6	-2
Total Lead	µg/L	10	8	4	-6
Dissolved Zinc	µg/L	100	80	40	-60
Dissolved Aluminum	µg/L	160	130	140	-20
Total Aluminum	µg/L	1,580	780	590	-990

Table TR6-9: Comparison of Predicted Pollutant Concentrations for the NRSP, Entrada, Legacy Village, and Valencia Commerce Center Projects with Water Quality Criteria and Observed Concentrations in Santa Clara River Reach 5

Modeled Parameter	Units	Predicted Average Annual Concentration	TMDL/ LA Basin Plan Water Quality Objectives	California Toxics Rule Criteria ¹	Wasteload Allocations for MS4 Discharges into the Santa Clara River Reach 5	Range of Observed ² Concentrations in Santa Clara River Reach 5	Average Wet Weather ³ Concentration at Station S29 (Days > 0.1")
TSS	mg/L	70	Water shall not contain suspended or settleable material in concentrations that cause nuisance or adversely affect beneficial uses	NA	NA	32 – 51,200	1,060
Total Phosphorus	mg/L	0.2	Waters shall not contain biostimulatory substances in concentrations that promote aquatic growth to the extent that such growth causes nuisance or adversely affects beneficial uses	NA	NA	0.18 – 13.4	0.58
Total Nitrogen	mg/L	2		NA	NA	<0.04 – 46 ⁷	4.4
Nitrate-N + Nitrite-N	mg/L	0.7	5	NA	6.8 ⁴	0.5 – 4.8	0.9
Ammonia-N	mg/L	0.2	2.0 ⁵	NA	1.75 ⁶	<0.005 – 1.1	0.20
Chloride	mg/L	19	100	NA	100	3 - 121	43
Dissolved Copper	µg/L	6	NA	32	NA	3.3 – 22.6	7.3
Total Lead	µg/L	4	NA	260	NA	0.6 – 40	18
Dissolved Zinc	µg/L	40	NA	250	NA	3 – 37	19
Total Aluminum	µg/L	590	NA	NA	NA	131 – 19,650	5,500

¹ Hardness = 250 mg/L, based on minimum observed value at USGS Station 11108500. Lead criteria is for total recoverable lead. There is no CTR criterion for aluminum.

² Range of concentrations observed in the Santa Clara River during wet weather (Stations S29, NR1, and NR3).

³ Average concentration observed in wet weather monitoring data at Station S29 for all storm events greater than 0.1 inches.

⁴ 30-day average.

⁵ 4-day average, ELS present, 90th percentile pH and temperature pairing observed at USGS Monitoring Station 11108500.

⁶ 30-day average in Reach 5 below Valencia.

⁷ Observed values for TKN (ammonia plus organic nitrogen).

As discussed above, the project's effluent is not expected to cause or contribute to a violation of the water quality standards in the project's receiving waters. Therefore, the project's incremental effects on surface water quality are not considered significant.

The Mission Village project's surface runoff water quality, after PDFs, both during construction and post-development, is predicted to comply with adopted regulatory requirements that are designed by the LARWQCB to assure that regional development does not adversely affect water quality, including MS4 Permit and SUSMP requirements, Construction General Permit requirements, General Dewatering Permit requirements, and benchmark Basin Plan water quality objectives, CTR criteria, and TMDLs. Any future urban development occurring in the Santa Clara River watershed also must comply with these requirements. By extrapolating the results of the direct and cumulative impact analysis in this topical response, it can be predicted that analysis of other proposed developments, when combined with existing conditions, would have similar water quality results. Therefore, cumulative impacts on surface water quality of receiving waters from the project and future urban development in the Santa Clara watershed are addressed through compliance with the MS4 Permit and SUSMP requirements, Construction General Permit requirements, General Dewatering Permit requirements, and benchmark Basin Plan water quality objectives, CTR criteria, and TMDLs, which are intended to be protective of beneficial uses of the receiving waters. Based on compliance with these requirements designed to protect beneficial uses, cumulative water quality impacts are reduced to a less-than-significant level.

Conclusion

None of the modeled pollutants of concern are expected to adversely affect water quality in surface waters, unreasonably affect present or anticipated beneficial uses of such waters, result in water quality less than that prescribed in the Basin Plan, or significantly impact receiving waters due to implementation of the comprehensive LID Implementation Plan. Therefore, potential impacts from the Mission Village project on receiving water quality are not considered significant.

References

The following documents were used in preparing this topical response, and are incorporated by reference and available for public review and inspection upon request to the Los Angeles County Department of Regional Planning.

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2.0 Topical Responses, Comment Letters, and Responses to Comment Letters

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Topical Response 7: 2010 Urban Water Management Plan

This topical response updates information found in the Mission Village Draft EIR, Section 4.8, Water Service. The source of the updated information is the 2010 Urban Water Management Plan (UWMP), which was adopted by the Castaic Lake Water Agency (CLWA) and the retail water purveyors in June 2011. Information presented in the 2010 UWMP supports the conclusion in the Mission Village Draft EIR that an adequate and sustainable supply of local and imported water is available to meet all future water supply needs of the Santa Clarita Valley, including the Mission Village project, without creating significant environmental impacts. The 2010 UWMP is found in the Mission Village Final EIR (October 2011), **Appendix F4.8(A)**.

Introduction

The California Urban Water Management Planning Act (UWMP Act) requires that urban water suppliers assess water supply reliability that compares total projected water use with the expected water supply over the next 20 years in five-year increments. The UWMP Act also requires an assessment for a single dry year and multiple dry years. It is the stated goal of CLWA and the retail water purveyors to deliver a reliable and high quality water supply for their customers, even during dry periods. Water suppliers are permitted to work together to develop a regional plan for the CLWA service area. This approach has been adopted by CLWA and the retail water suppliers in the Santa Clarita Valley (Valley), which jointly sponsored the 2010 UWMP.

In this topical response, emphasis is made to the 2010 UWMP's description of water reliability planning (2010 UWMP, Section 6), including an update to water supplies and water demand for the Santa Clarita Valley. In addition to reliability planning, the 2010 UWMP includes specific sections addressing the following topical areas:

- **Section 2:** Water Use (including historical and projected water use)
- **Section 3:** Water Resources (including local and imported water supplies)
- **Section 4:** Recycled Water
- **Section 5:** Water Quality (including information regarding perchlorate and chlorides)
- **Section 7:** Water Demand Management Measures (including water conservation objectives), and
- **Section 8:** Water Shortage Contingency Planning (in response to potential water shortages and water supply disruptions)

These sections of the 2010 UWMP are summarized below. For detailed information regarding these topics, please see the full text of the 2010 UWMP, found in the Mission Village Final EIR (October 2011), **Appendix F4.8(A)**.

In summarizing the water reliability planning portion of the 2010 UWMP, certain tables presented in the 2010 UWMP have been reproduced in this topical response. The tables presented here have not been renumbered in order to maintain consistency with the adopted 2010 UWMP.

Water Supplies, Water Demand, and Reliability Planning (2010 UWMP, Section 6)

Reliability of Water Supplies

Each water supply source has its own reliability characteristics. In any given year, the variability in weather patterns around the state may affect the availability of supplies to the Valley differently. For example, from 2000 through 2002, Southern California experienced dry conditions in all three years. During the same period, Northern California experienced one dry year and two normal years. The Valley is typical in terms of water management in Southern California; local groundwater supplies are used to a greater extent when imported supplies are less available due to dry conditions in the north, and larger amounts of imported water supplies are used during periods when Northern California has wetter conditions. This pattern of “conjunctive use” has been in effect since State Water Project (SWP) supplies first came to the Valley in 1980. SWP and other imported water supplies have supplemented the overall supply of the Valley, which previously depended solely on local groundwater supplies. While each of the Valley’s available supply sources has some variability, the variability in SWP supplies has the largest effect on overall supply reliability.

As discussed in the 2010 UWMP, Section 3.2, each SWP contractor’s Water Supply Contract contains a Table A Amount that identifies the maximum amount of Table A water that contractor may request each year. However, the amount of SWP water actually allocated to contractors each year is dependent on a number of factors that can vary significantly from year-to-year. The primary factors affecting SWP supply availability include the availability of water at the source of supply in Northern California, the ability to transport that water from the source to the primary SWP diversion point in the southern Delta, and the magnitude of total contractor demand for that water. In many years, the availability of SWP supplies to CLWA and the other SWP contractors is less than their maximum Table A Amounts, and can be significantly less in very dry years.

The Department of Water Resources (DWR) has completed the 2009 State Water Project Delivery Reliability Report, prepared biennially (2009 Reliability Report). The 2009 Reliability Report assists SWP contractors and local planners in assessing the reliability of the SWP component of their overall supplies. In its Reliability Reports, DWR presents the results of its analysis of the reliability of SWP supplies, based on model studies of SWP operations. In general, DWR model studies show the anticipated amount of SWP supply that would be available for a given SWP water demand, given an assumed set of physical facilities and operating constraints, based on 82 years of historic hydrology. The results are interpreted as the capability of the SWP to meet the assumed SWP demand, over a range of hydrologic conditions, for that assumed set of physical facilities and operating constraints.

DWR's 2009 Reliability Report presents the results of model studies for years 2009 and 2029. In these model studies, DWR assumed existing SWP facilities and operating constraints for both 2009 and 2029. The primary differences between the two studies are an increase in projected SWP contractor demands, an increase in projected upstream demands (which affects SWP supplies by reducing the amount of inflows available for the SWP), and the inclusion in the 2029 study of potential impacts on historic hydrology of the effects of climate change and accompanying sea level rise. In the report, DWR presents the SWP delivery capability resulting from these studies as a percentage of maximum contractor Table A Amounts. To estimate supply capability in intermediate years between 2009 and 2029, DWR interpolates between the results of those studies.

Table 3-2 below shows CLWA's contractor-specific SWP supplies projected to be available in average/normal years (based on the average delivery over the study's historic hydrologic period from 1922 through 2003). Table 3-2 also summarizes estimated SWP supply availability in a single dry year (based on a repeat of the worst-case historic hydrologic conditions of 1977) and over a multiple dry year period (based on a repeat of the historic four-year drought of 1931 through 1934).

Table 3-2
SWP Table A Supply Reliability (af)(a)(b)

Wholesaler (Supply Source)	2010	2015	2020	2025	2030-2050
Average Water Year(c)					
DWR (SWP)					
Table A Supply	58,300	58,100	57,900	57,600	57,400
% of Table A Amount(d)	61%	61%	61%	61%	60%
Single Dry Year(e)					
DWR (SWP)					
Table A Supply	12,800	11,900	11,000	10,000	9,100
% of Table A Amount	13%	12%	12%	11%	10%
Multi-Dry Year(f)					
DWR (SWP)					
Table A Supply	32,800	32,900	32,900	33,000	33,000
% of Table A Amount	34%	35%	35%	35%	35%

Notes:

- (a) Supplies to CLWA provided by DWR from detailed delivery results from the analyses presented in DWR's "2009 SWP Delivery Reliability Report." As indicated in the 2009 Reliability Report, the supplies are based on existing SWP facilities and current regulatory and operational constraints.
- (b) Table A supplies include supplies allocated in one year that are carried over for delivery the following year.
- (c) Based on average deliveries over the study's historic hydrologic period of 1922 through 2003.
- (d) Supply as a percentage of CLWA's Table A Amount of 95,200 af.
- (e) Based on the worst case historic single dry year of 1977.
- (f) Supplies shown are annual averages over four consecutive dry years, based on the historic four-year dry period of 1931-1934.

Normal, Single-Dry, and Multiple-Dry Year Planning

The water suppliers have various water supplies available to meet demands during normal, single-dry, and multiple-dry years. The following sections elaborate on the different supplies available to the water suppliers including groundwater, recycled water, and imported supplies.

Groundwater: In accordance with the groundwater operating plan for the Santa Clara River Valley Groundwater Basin, East Subbasin (basin), groundwater supplies from the Alluvial Aquifer are planned to be in the range 30,000 to 40,000 acre-feet per year (afy) in average years and 30,000 to 35,000 afy in dry years; supplies from the Saugus Formation are projected to be 7,500 to 15,000 afy in average years and 15,000 to 35,000 afy in dry years. The 2009 Basin Yield Update concluded pumping in those ranges to be

sustainable. While there is sufficient Alluvial pumping capacity to achieve the Alluvial groundwater supply,⁵⁷ it is planned that the Valencia Water Company (Valencia) will develop some future capacity as it constructs municipal supply wells to replace existing agricultural wells when planned development converts existing agricultural land use to municipal land use. Existing Saugus pumping capacity is sufficient to achieve about 27,000 afy,⁵⁸ or about 77 percent of the upper end of the Saugus operating plan. Hence, it is planned that restored capacity (Valencia Well 201) and future Saugus pumping capacity (new wells) will be added to achieve the full range of the Saugus operating plan.

The existing and planned groundwater supplies used in the 2010 UWMP are generally the pumping rates, within the operating plan ranges, that were analyzed in the Basin Yield update. As such, they tend toward the upper ends of the respective ranges except for normal year Saugus pumping, which is closer to mid-range of the Saugus operating plan. For the multiple-dry year period, it was assumed that pumping from the Saugus Formation would be governed by the groundwater operating plan summarized in 2010 UWMP Table 3-5, with average pumping over the 4-year dry period of about 21,500 afy. Total projected Alluvial and Saugus pumping, including pumping by the purveyors and by agricultural and other users, is shown by year type in Tables 3-7 to 3-12 in the 2010 UWMP, Section 3. As shown there, total pumping in each year type remains within the pumping ranges in the groundwater operating plan.

Recycled Water: Recycled water is available from the Saugus Water Reclamation Plant (WRP) and the Valencia WRP. Recycled water is also anticipated to be produced by the Newhall WRP for the Newhall Ranch Specific Plan, as described in the 2010 UWMP, Section 4.

CLWA has completed construction of Phase I of its Recycled Plan, a multi-phased program to deliver recycled water in the Valley. Phase 1 can deliver 1,700 afy of water through the Valencia system. Deliveries of recycled water began in 2003 for irrigation water supply at a golf course and in roadway median strips. In 2010, recycled water deliveries were approximately 325 af.

CLWA completed a preliminary design report in 2009 on the second phase of the Recycled Plan (Phase 2A), which will take water from the Saugus WRP and distribute it to identified users to the north, across the Santa Clara River and then to the west and east. Large irrigation customers will be served with this expansion with a collective design that will increase recycled water deliveries by 500 afy. Recycled water will be further expanded within the region with the South End Recycled Water project (Phase 2C),

⁵⁷ 2010 UWMP, Table 3-8

⁵⁸ 2010 UWMP Table 3-9

which will expand the existing recycled water transmission and distribution system southerly to supply recycled water to additional Valencia customers, as well as some customers served by Newhall County Water District (NCWD) and the Santa Clarita Valley Water District (SCWD). The project includes the planning, designing and constructing Phase 2C of the region's Recycled Plan, with recycled water improvements including various recycled water pipelines and pumping stations resulting in the use of an estimated 910 afy of recycled water.

Overall, the recycled water program is expected to ultimately deliver up to 22,800 afy of treated (tertiary) wastewater suitable for reuse on golf courses, landscaping, and other non-potable uses. Of this total, 21,300 afy is projected use by purveyor customers. This supply is assumed to be available in an average year, a single-dry year, and in each year of a multiple-dry year period.

State Water Project Table A Supply: For the 2010 UWMP, the availability of SWP supplies to CLWA was based on DWR's 2009 Reliability Report, taken from more detailed results provided by DWR from the model studies presented in the 2009 Reliability Report. For the three hydrologic conditions evaluated here, the SWP deliveries to CLWA were taken from DWR's analyses based on the following: average/normal year based on the average deliveries over the studies' 82-year historical hydrologic study period (1922 through 2003), single-dry year based on a repeat of the worst-case historical hydrologic conditions of 1977, and multiple-dry year period based on a repeat of the historical four-year drought of 1931 through 1934.

As discussed in more detail in the 2010 UWMP, Section 3 (see Section 3.2.1.2.3), a planning effort to increase long-term supply reliability for both the SWP and Central Valley Project (CVP) is taking place through the Bay Delta Conservation Plan (BDCP). While the proposed conveyance facilities that are part of the BDCP would increase SWP supply reliability, that increase is not included in the 2010 UWMP. Any of the proposed facilities that are completed would increase SWP reliability beyond the values used throughout the 2010 UWMP.

Flexible Storage Account: Under the Water Supply Contracts with DWR for SWP water, the SWP contractors that share in the repayment of Castaic Lake may access a portion of the storage in that reservoir. This accessible storage is referred to as "flexible storage." The SWP contractors may withdraw water from flexible storage, in addition to their allocated Table A supplies, on an as-needed basis. A contractor must replace any water it withdraws from this storage within five years. As one of the three contractors sharing in the repayment of Castaic Lake, CLWA has access to this flexible storage. Its share of the total flexible storage is currently 4,684 af. After negotiations with Ventura County water agencies in 2005, CLWA gained access to their 1,376 af of flexible storage for 10 years through 2015. While it is

expected that CLWA and Ventura County will extend the existing flexible storage agreement beyond the 2015 term, in the 2010 UWMP, it is not assumed to be available beyond 2015.

CLWA plans to use this supply only in dry years. For the single-dry year condition, it was assumed the entire amount would be used. For the multiple-dry year condition, it was assumed that the entire amount would be used sometime during the four-year period, so the average annual supply during that period would be one fourth of the total. Any water withdrawn was assumed to be replaced in intervening average and wet years and would be available again for use in the next dry year.

Buena Vista-Rosedale: Buena Vista Water Storage District (BVWSD) and Rosedale-Rio Bravo Water Storage District (RRBWSD), both member districts of Kern County Water Agency (KCWA), have jointly developed a program that provides both a firm water supply of 11,000 afy and a water banking component. This supply program provides a firm annual water supply available every year based on existing and longstanding Kern River water rights, which is delivered by exchange of Buena Vista's and Rosedale's SWP Table A supplies.

Nickel Water - Newhall Land: This supply is similar to Buena Vista-Rosedale supply both in regard to its source (Kern River water rights) and level of reliability. The supply from this program is up to 1,607 afy of firm supply, which is available in every year. It was acquired by the developer of the Newhall Ranch Specific Plan project to supplement groundwater and recycled water sources of supply for the Newhall Ranch Specific Plan, which is in the CLWA service area. In the 2010 UWMP, it is anticipated that this water supply will be available to Valencia.

Semitropic Banking Program: In 2002, CLWA stored 24,000 af of its allocated SWP Table A supply through a groundwater banking agreement with Semitropic. In 2004, CLWA stored 32,522 af of its 2003 allocated SWP Table A supply in a second Semitropic storage account. Under the terms of those agreements, and after consideration for losses within the groundwater basin, CLWA could withdraw up to 50,870 af when needed within 10 years of when the water was stored. Of this storage, CLWA withdrew 4,950 af in 2009 and 2010, leaving 45,920 af currently available for withdrawal. CLWA executed an amendment for a 10-year extension of each banking agreement with Semitropic in April 2010.

In addition to this short-term storage for CLWA, Semitropic has a long-term groundwater banking program with several other partners. The facilities that Semitropic may use in the return of CLWA's banked water supply are the same facilities that Semitropic may use to return banked water to its long-term banking program partners. As a result, there may be competition for use of those facilities in a particularly dry year, which could limit CLWA's ability to access the water in that year.

CLWA plans to use this supply only in dry years. For the single dry year, it was assumed that competition among Semitropic's banking partners for use of return facilities would limit CLWA's supply to about one third of the storage available, or about 15,000 af. For the multiple-dry year period, it was assumed that the entire amount would be accessible and used sometime during the four-year period, so the average annual supply during that period would be one fourth of the total available, or about 11,500 af. Under the agreements for this program, including the agreement for the 10-year time extension, the stored water must be withdrawn within 20 years of when it was stored. Therefore, it was assumed that this supply is available only through 2023.

Semitropic Banking Program - Newhall Land: As was the case for the Nickel water, the banking program was entered into by the developer of the Newhall Ranch Specific Plan project to firm up the reliability of the water supply for the project, which is in the CLWA service area. The storage capacity of this program is 55,000 af. Newhall Land currently has 23,167 af stored in the Semitropic program. It is anticipated that this supply will be available to Valencia.

Valencia plans to use this supply only in dry years. For the single-dry year, supplies were assumed at the program's maximum withdrawal capacity of 4,950 afy. For the multiple-dry year period, supplies in each year of the dry period were assumed at the program's maximum withdrawal capacity of 4,950 afy and that additional supplies would be banked during wetter years to allow withdrawal of this amount.

Rosedale-Rio Bravo Banking Program: RRBWSD also has developed a water banking and exchange program. CLWA has entered into a long-term agreement with RRBWSD, which provides it with storage and withdrawal capacity of 20,000 afy and up to 100,000 af of storage capacity. Withdrawals from the program can be made by exchange of Rosedale's SWP Table A supply, or by pumpback into the California Aqueduct. CLWA began storing water in this program in 2005 and has since reached the program's maximum storage capacity, with 100,000 af currently available for withdrawal.

CLWA plans to use this supply only in dry years. For the single-dry year, supplies were assumed at the program's maximum withdrawal capacity of 20,000 af. For the multiple-dry year period, it was assumed that supplies would average at least 15,000 afy over the dry period and that additional supplies would be banked during wetter years to allow withdrawal of at least this amount.

Additional Planned Banking: CLWA's 2009 update of its reliability plan identifies a need for additional banking programs to firm up the dry-year reliability of service area supplies, and includes an implementation schedule to increase both storage and pumpback capacity beginning in 2010 and incrementally increasing through 2050. While a specific banking program has not yet been identified, CLWA's plans call for development of additional groundwater banking programs with pumpback

capacity of at least an additional 10,000 af by 2025, and a second additional 10,000 af by 2035. For the single-dry year, supplies were assumed at the programs' pumpback capacity. For the multiple-dry year period, it was assumed that supplies would average at least 75 percent of the pumpback capacity over the dry period.

Supply and Demand Comparisons

The available supplies and water demands for CLWA's service area were analyzed to assess the region's ability to satisfy demands during three scenarios: a normal water year, single-dry year, and multiple-dry years. The tables in this section present the supplies and demands for the various drought scenarios for the projected planning period of 2015-2050 in five-year increments. The available supplies and water demands broken down by purveyor during the same three scenarios also were analyzed over the project planning period, and these tables are provided in the 2010 UWMP, Appendix C. Table 6-1 reproduced below presents the base years for the development of water year data. Tables 6-2, 6-3 and 6-4, also reproduced below, summarize, respectively, Normal Water Year, Single-Dry Water Year, and Multiple-Dry Year supplies.

The reader is referred to 2010 UWMP Section 2 for development of retail purveyor demands, and current and projected water supplies are developed in Sections 3 and 4.

**Table 6-1
Basis Of Water Year Data**

Water Year Type	Base Years	Historical Sequence
Normal Water Year	Average	1922-2003
Single-Dry Water Year	1977	-
Multiple-Dry Water Years	1931-1934	--

Normal Water Year: Table 6-2, below, summarizes the water suppliers' supplies available to meet demands over the 40-year planning period during an average/normal year. As presented in the table, the water suppliers' water supply is broken down into existing and planned water supply sources, including wholesale (imported) water, local supplies and banking programs. Demands are shown with and without the urban demand reduction resulting from SBX7-7 conservation objectives.

See the 2010 UWMP, Appendix C, for the breakdown by purveyor of supplies available to meet demands over the 40-year planning period during an average/normal year.

Table 6-2
Projected Average/Normal Year Supplies and Demands

	2015	2020	2025	2030	2035	2040	2045	2050
Existing Supplies								
Existing Groundwater ^(a)								
Alluvial Aquifer	24,000	24,000	24,000	25,000	25,000	25,000	25,000	25,000
Saugus Formation ^(b)	9,225	10,225	10,225	10,225	10,225	10,225	10,225	10,225
Total Groundwater	33,225	34,225	34,225	35,225	35,225	35,225	35,225	35,225
Recycled Water^(c)	325							
Imported Water								
State Water Project ^(d)	58,100	57,900	57,600	57,400	57,400	57,400	57,400	57,400
Flexible Storage Accounts	-	-	-	-	-	-	-	-
Buena Vista-Rosedale	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000
Nickel Water - Newhall Land	1,607	1,607	1,607	1,607	1,607	1,607	1,607	1,607
Total Imported	70,707	70,507	70,207	70,007	70,007	70,007	70,007	70,007
Banking Programs ^(e)								
Rosedale Rio-Bravo	-	-	-	-	-	-	-	-
Semitropic	-	-	-	-	-	-	-	-
Semitropic - Newhall Land	-	-	-	-	-	-	-	-
Total Banking	-							
Total Existing Supplies	104,257	105,057	104,757	105,557	105,557	105,557	105,557	105,557
Planned Supplies								
Future Groundwater ^(f)								

2.0 Topical Responses

	2015	2020	2025	2030	2035	2040	2045	2050
Alluvial Aquifer	-	1,000	2,000	3,000	4,000	5,000	6,000	7,000
Saugus Formation	1,375	1,375	1,375	1,375	1,375	1,375	1,375	1,375
Total Groundwater	1,375	2,375	3,375	4,375	5,375	6,375	7,375	8,375
Recycled Water ^(c)	975	2,725	5,225	7,775	10,275	13,775	17,275	20,975
Banking Programs ^(e)	-	-	-	-	-	-	-	-
Total Planned Supplies	2,350	5,100	8,600	12,150	15,650	20,150	24,650	29,350
Total Existing and Planned Supplies	106,607	110,157	113,357	117,707	121,207	125,707	130,207	134,907
Demand w/o Conservation ^(g)	80,070	88,484	96,898	105,312	113,726	122,140	130,554	138,968
20x2020 Reduction ^(h)	9,027	19,626	21,166	22,770	24,342	25,914	27,486	29,058
Reduction from Recycled Water ⁽ⁱ⁾	1,300	3,050	5,550	8,100	10,600	14,100	17,600	21,300
Reduction from Water Conservation ^(j)	7,727	16,576	16,662	16,748	16,833	16,919	17,005	17,091
Demand w/ Conservation ^(k)	72,343	71,908	80,236	88,564	96,892	105,220	113,549	121,877

Notes:

- ^(a) Existing groundwater supplies represent the quantity of groundwater anticipated to be pumped with existing wells. As indicated in Tables 3-8 and 3-9 and Tables 3-4 and 3-5 of the 2009 Groundwater Basin Yield Analysis, individual purveyors may have well capacity in excess of quantities shown in this table. As indicated in Table 3-10, existing and planned groundwater pumping remain within the groundwater operating plan shown on Table 3-5.
- ^(b) SCWD's existing Saugus 1 and Saugus 2 wells resumed production in 2011 with the completion of the perchlorate treatment facility.
- ^(c) Recycled water projections from Table 4-3.
- ^(d) SW P supplies are based on the Department of Water Resources "2009 State Water Project Delivery Reliability Report."
- ^(e) Not needed in average/normal years.
- ^(f) Planned groundwater supplies represent new groundwater well capacity that may be required by an individual purveyor's production objectives in the Alluvial Aquifer and the Saugus Formation. As indicated in Table 3-10, existing and planned groundwater pumping remain within the groundwater operating plan shown on Table 3-5
- ^(g) Demand w/o Conservation data from Table 2-2.
- ^(h) 20x2020 Reduction for the Region from Table 2-22.
- ⁽ⁱ⁾ Recycled Water Reduction for the Region from Table 2-22; does not include demands from Honor Rancho.
- ^(j) Reduction from Water Conservation calculation for Region from Table 2-22.
- ^(k) Demand w/ Conservation is Demand w/o Conservation minus Reduction from Water Conservation.

Single-Dry Year: The water supplies and demands for the water suppliers over the 40-year planning period were analyzed in the event that a single-dry year occurs, similar to the drought that occurred in California in 1977. Table 6-3, below, summarizes the existing and planned supplies available to meet demands during a single-dry year. Base demand (demand without conservation) during dry years was assumed to increase by 10 percent. Demands also are shown with the urban demand reduction resulting from SBX7-7 conservation objectives.

See the 2010 UWMP, Appendix C, for the breakdown by purveyor of supplies available to meet demands over the 40-year planning period during a single-dry year.

**Table 6-3
Projected Single-Dry Year Supplies And Demands**

	2015	2020	2025	2030	2035	2040	2045	2050
Existing Supplies								
Existing Groundwater ^(a)								
Alluvial Aquifer	20,300	20,250	20,200	21,050	21,050	21,025	21,000	20,650
Saugus Formation	20,400	20,400	20,400	20,400	20,400	20,400	20,400	20,400
Total Groundwater	40,700	40,650	40,600	41,450	41,450	41,425	41,400	41,050
Recycled Water ^(b)								
	325	325	325	325	325	325	325	325
Imported Water								
State Water Project ^(c)	11,900	11,000	10,000	9,100	9,100	9,100	9,100	9,100
Flexible Storage Accounts ^(d)	6,060	4,680	4,680	4,680	4,680	4,680	4,680	4,680
Buena Vista-Rosedale	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000
Nickel Water - Newhall Land	1,607	1,607	1,607	1,607	1,607	1,607	1,607	1,607
Total Imported	30,56	28,287	27,287	26,387	26,387	26,387	26,387	26,387
Banking Programs								
Rosedale Rio-Bravo ^(e)	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000
Semitropic ^(f)	15,000	15,000	-	-	-	-	-	-
Semitropic - Newhall Land ^(g)	4,950	4,950	4,950	4,950	4,950	4,950	4,950	4,950
Total Banking	39,950	39,950	24,950	24,950	24,950	24,950	24,950	24,950
Total Existing Supplies	111,542	109,212	93,162	93,112	93,112	93,087	93,062	92,712

2.0 Topical Responses

	2015	2020	2025	2030	2035	2040	2045	2050
Planned Supplies								
Future Groundwater ^(h)								
Alluvial Aquifer	200	1,250	2,300	3,850	4,850	5,875	6,900	7,750
Saugus Formation (Restored Well)	825	3,777	3,777	3,777	3,777	3,777	3,777	3,750
Saugus Formation (New Wells)	2,875	9,923	9,923	9,923	9,923	9,923	9,923	9,950
Total Groundwater	3,900	14,950	16,000	17,550	18,550	19,575	20,600	21,450
Recycled Water ^(b)	975	2,725	5,225	7,775	10,275	13,775	17,275	20,975
Banking Programs ⁽ⁱ⁾	-	-	10,000	10,000	20,000	20,000	20,000	20,000
Total Planned Supplies	4,875	17,675	31,225	35,325	48,825	53,350	57,875	62,425
Total Existing and Planned Supplies	116,417	126,887	124,387	128,437	141,937	146,437	150,937	155,137
Demand w/o Conservation ^(j)	88,077	97,332	106,588	115,843	125,099	134,354	143,609	152,865
20x2020 Reduction ^(k)	9,027	19,626	21,166	22,770	24,342	25,914	27,486	29,058
Reduction from Recycled Water ^(l)	1,300	3,050	5,550	8,100	10,600	14,100	17,600	21,300
Reduction from Water Conservation ^(m)	7,727	16,576	16,662	16,748	16,833	16,919	17,005	17,091
Demand w/ Conservation ⁽ⁿ⁾	80,350	80,757	89,926	99,096	108,265	117,434	126,604	135,773

	2015	2020	2025	2030	2035	2040	2045	2050
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- Notes:
- (a) Existing groundwater supplies represent the quantity of groundwater anticipated to be pumped with existing wells. As indicated in Tables 3-8 and 3-9 and Tables 3-4 and 3-5 of the 2009 Groundwater Basin Yield Analysis, individual purveyors may have well capacity in excess of quantities shown in this table. As indicated in Table 3-11, existing and planned groundwater pumping remain within the groundwater operating plan shown on Table 3-5. SCWD's existing Saugus 1 and Saugus 2 wells resumed production in 2011 with the completion of the perchlorate treatment facility.
- (b) Recycled water projections from Table 4-3.
- (c) SWP supplies are based on the Department of Water Resources "2009 State Water Project Delivery Reliability Report."
- (d) Includes both CLWA and Ventura County entities flexible storage accounts. Initial Term of agreement with Ventura County entities expires after 2015.
- (e) CLWA has a maximum withdrawal capacity of 20,000 afy and a storage capacity of 100,000 af. As of 6/1/2011, there is 100,000 af of recoverable water.
- (f) CLWA has 45,920 af of recoverable water as of 6/1/2011.
- (g) Newhall Land has a maximum withdrawal capacity of 4,950 afy and a storage capacity of 55,000 af. As of 6/1/2011 there is 18,892 af of recoverable water. Delivery of stored water from the Newhall Land's Semitropic Water Banking and Exchange Program is assumed available to Valencia.
- (h) Planned groundwater supplies represent new groundwater well capacity that may be required by an individual purveyor's production objectives in the Alluvial Aquifer and the Saugus Formation, including 3,777 afy of restored capacity from Valencia Well 201 and approximately 10,000 afy of new Saugus Formation well capacity. When combined with existing purveyor and non-purveyor groundwater supplies, total groundwater production is consistent with the 1977 single dry-year levels identified in Table 3-8 of the 2009 Groundwater Basin Yield Analysis. As indicated in Table 3-11, existing and planned groundwater pumping remain within the groundwater operating plan shown on Table 3-5.
- (i) Includes banking programs with 10,000 af of additional pumpback capacity by 2025 and a second additional 10,000 af by 2035.
- (j) Demand w/o Conservation data from Table 2-2. Includes a 10 percent increase in demand during dry years.
- (k) 20x2020 Reduction for the Region from Table 2-22.
- (l) Recycled Water Reduction for the Region from Table 2-22; does not include demands from Honor Rancho.
- (m) Reduction from Water Conservation calculation for Region from Table 2-22.
- (n) Demand w/ Conservation is Demand w/o Conservation minus Reduction from Water Conservation.

Multiple-Dry Year: The water supplies and demands for the water suppliers' water supply over the 40-year planning period were analyzed in the event that a four-year multiple-dry year event occurs, similar to the drought that occurred during the years 1931 to 1934. Table 6-4, below, summarizes the existing and planned supplies available to meet demands during multiple-dry years. Base demand during dry years was assumed to increase by 10 percent. Demands also are shown with the urban demand reduction resulting from SBX7-7 conservation objectives.

See the 2010 UWMP, Appendix C, for the breakdown by purveyor of supplies available to meet demands over the 40-year planning period during a multiple-dry year.

Table 6-4
Projected Multiple-Dry Year Supplies And Demands

	2015	2020	2025	2030	2035	2040	2045	2050
Existing Supplies								
Existing Groundwater ^(a)								
Alluvial Aquifer	20,425	20,425	20,425	21,825	21,825	21,825	21,825	21,325
Saugus Formation	19,700	19,700	19,700	19,700	19,700	19,700	19,700	19,700
Total Groundwater	40,125	40,125	40,125	41,525	41,525	41,525	41,525	41,025
Recycled Water ^(b)								
	325	325	325	325	325	325	325	325
Imported Water								
State Water Project ^(c)	32,900	32,900	33,000	33,000	33,000	33,000	33,000	33,000
Flexible Storage Accounts ^(d)	1,510	1,170	1,170	1,170	1,170	1,170	1,170	1,170
Buena Vista-Rosedale	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000
Nickel Water - Newhall Land	1,607	1,607	1,607	1,607	1,607	1,607	1,607	1,607
Total Imported	47,017	46,677	46,777	46,777	46,777	46,777	46,777	46,777
Banking Programs								
Rosedale Rio-Bravo ^(e)	15,000	15,000	15,000	15,000	15,000	15,000	15,000	15,000
Semitropic ^(f)	11,500	11,500	-	-	-	-	-	-
Semitropic - Newhall Land ^(g)	4,950	4,950	4,950	4,950	4,950	4,950	4,950	4,950
Total Banking	31,450	31,450	19,950	19,950	19,950	19,950	19,950	19,950
Total Existing Supplies	118,917	118,577	107,177	108,577	108,577	108,577	108,577	108,077

2.0 Topical Responses

	2015	2020	2025	2030	2035	2040	2045	2050
Planned Supplies								
Future Groundwater ^(b)								
Alluvial Aquifer	-	1,000	2,000	3,000	4,000	5,000	6,000	7,000
Saugus Formation (Restored Well)	2,375	1,625	1,500	1,400	1,275	1,125	1,000	875
Saugus Formation (New Wells)	2,250	10,325	10,450	10,550	10,675	10,825	10,950	11,075
Total Groundwater	4,625	12,950	13,950	14,950	15,950	16,950	17,950	18,950
Recycled Water ^(b)	975	2,725	5,225	7,775	10,275	13,775	17,275	20,975
Banking Programs ⁽ⁱ⁾	-	-	7,500	7,500	15,000	15,000	15,000	15,000
Total Planned Supplies	5,600	15,675	26,675	30,225	41,225	45,725	50,225	54,925
Total Existing and Planned Supplies	124,517	134,252	133,852	138,802	149,802	154,302	158,802	163,002
Demand w/o Conservation ^(j)	88,068	97,325	106,582	115,838	125,095	134,352	143,608	152,865
20x2020 Reduction ^(k)	9,027	19,626	21,166	22,770	24,342	25,914	27,486	29,058
Reduction from Recycled Water ^(l)	1,300	3,050	5,550	8,100	10,600	14,100	17,600	21,300
Reduction from Water Conservation ^(m)	7,727	16,576	16,662	16,748	16,833	16,919	17,005	17,091
Demand w/ Conservation ⁽ⁿ⁾	80,342	80,749	89,920	99,091	108,261	117,432	126,603	135,773

Summary of Comparisons: As shown in the analyses above, CLWA and the retail purveyors have adequate supplies to meet CLWA service area demands during normal, single-dry, and multiple-dry years throughout the 40-year planning period.

Water Use Overview (2010 UWMP, Section 2)

This section describes historic and current water usage and the methodology used to project future demands within CLWA's service area. Water usage is divided into sectors such as residential, industrial, commercial, landscape, agricultural, and other purposes. To undertake this evaluation, existing land use data and new housing construction information were compiled from each of the retail water purveyors and projections evaluated from each retailer's master planning documents. This information was then compared to historic trends for new water service connections and customer water usage information. In addition, weather and water conservation effects on historical water usage were considered in the evaluation.

Several factors can affect demand projections, including:

- Land use revisions
- New regulations
- Consumer choice
- Economic conditions
- Transportation needs
- Highway construction
- Environmental factors
- Conservation programs
- Building and plumbing codes

The foregoing factors affect the amount of water needed, as well as the timing of when it is needed. During an economic recession, there is a major downturn in development and a subsequent slowing of the projected demand for water. The projections in the 2010 UWMP do not attempt to forecast recessions or droughts. Likewise, no speculation is made about future building and plumbing codes or other regulatory changes. However, the projections include water conservation consistent with new legislative requirements calling for a 20 percent reduction in per capita demand by 2020 (SBX7-7).

An analysis was performed that combined growth projections with water use data to forecast total water demand in future years. Water uses were broken out into specific categories and assumptions made about each to more accurately project future use. Three separate data sets were collected and included in the model: historical water use by land use type, current population, and projected population.

Water Resources Overview (2010 UWMP, Section 3)

This section describes the water resources available to CLWA and the purveyors for the next 40 years. The suppliers' existing water resources include wholesale (imported) supplies, local groundwater, recycled water, and water from existing groundwater banking programs. Planned supplies include new groundwater production as well as additional banking programs. These existing and planned supplies are summarized in **Table 3-1**, below, and discussed in more detail in the 2010 UWMP, Section 3.

Table 3-1
Summary Of Current And Planned Water Supplies And Banking Programs^(a)

	–	–	201 –	201 –	202 –	202 –	203 –	203 –	204 –	204 –	205
	0	5	0	5	0	5	0	5	0	5	0
Existing Supplies											
Existing Groundwater ^(b)											
Alluvial Aquifer	24,385	24,000	24,000	24,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000
Saugus Formation ^(c)	6,725	9,225	10,225	10,225	10,225	10,225	10,225	10,225	10,225	10,225	10,225
Total Groundwater	31,110	33,225	34,225	34,225	35,225						
Recycled Water^(d)	Total Recycled	325									
Imported Water											
State Water Project ^(e)	58,300	58,100	57,900	57,600	57,400	57,400	57,400	57,400	57,400	57,400	57,400
Flexible Storage Accounts ^(f)	6,060	6,060	4,680	4,680	4,680	4,680	4,680	4,680	4,680	4,680	4,680
Buena Vista-Rosedale	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000
Nickel Water - Newhall Land	1,607	1,607	1,607	1,607	1,607	1,607	1,607	1,607	1,607	1,607	1,607
Total Imported	76,967	76,767	75,187	74,887	74,687						
Existing Banking Programs ^(g)											
Rosedale Rio-Bravo	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000
Semitropic	15,000	15,000	15,000	-	-	-	-	-	-	-	-
Semitropic - Newhall Land	4,950	4,950	4,950	4,950	4,950	4,950	4,950	4,950	4,950	4,950	4,950
Total Banking	39,950	39,950	39,950	24,950							
Planned Supplies											
Future Groundwater ^(h)											
Alluvial Aquifer	-	-	1,000	2,000	3,000	4,000	5,000	6,000	7,000		
Saugus Formation	-	1,375	1,375	1,375	1,375	1,375	1,375	1,375	1,375	1,375	1,375
Total Groundwater	-	1,375	2,375	3,375	4,375	5,375	6,375	7,375	8,375		
Recycled Water⁽ⁱ⁾	-	975	2,725	5,225	7,775	10,275	13,775	17,275	20,975		
Planned Banking Programs	-	-	-	10,000	10,000	20,000	20,000	20,000	20,000	20,000	20,000

Notes:

- (a) The values shown under "Existing Supplies" and "Planned Supplies" are projected to be available in average/normal years. The values shown under "Existing Banking Programs" and "Planned Banking Programs" are the maximum capacity of program withdrawals.*
 - (b) Existing groundwater supplies represent the quantity of groundwater anticipated to be pumped with existing wells. As indicated in Tables 3-8 and 3-9 and Tables 3-4 and 3-5 of the 2009 Groundwater Basin Yield Analysis, individual purveyors may have well capacity in excess of quantities shown in this table. As indicated in Table 3-10, existing and planned groundwater pumping remain within the groundwater operating plan shown on Table 3-5.*
 - (c) SCWD's existing Saugus 1 and Saugus 2 wells resumed production in 2011 with the completion of the perchlorate treatment facility.*
 - (d) Represents recycled water being delivered in 2010 with existing facilities. CLWA currently has 1,700 afy under contract.*
 - (e) SWP supplies are based on the Department of Water Resources "2009 State Water Project Delivery Reliability Report."*
 - (f) Includes both CLWA and Ventura County entities flexible storage accounts. Initial term of agreement with Ventura County entities expires after 2015.*
 - (g) Supplies shown are annual amounts that can be withdrawn and would typically be used only during dry years.*
 - (h) Planned groundwater supplies represent new groundwater well capacity that may be required by an individual purveyor's production objectives in the Alluvial Aquifer and the Saugus Formation. When combined with existing purveyor and non-purveyor groundwater supplies, total groundwater production remains within the sustainable ranges identified in Table 3-8 of 2009 Groundwater Basin Yield Analysis. As indicated in Table 3-10, existing and planned groundwater pumping remain within the basin operating plan shown on Table 3-5.*
 - (i) See Table 4-3. Total Purveyor and Non-Purveyor Recycled Water less Existing Supply.*
-

Recycled Water Overview (2010 UWMP, Section 4)

This section of the 2010 UWMP describes the existing and future recycled water opportunities available to the CLWA service area. The description includes estimates of potential recycled water supply and demand for 2010 to 2050 in five-year increments, as well as CLWA's proposed incentives and implementation plan for recycled water.

In normal years, approximately 55 percent of the demands within CLWA's service area are met with imported water. However, the reliability of the imported SWP supply is variable (due in part to its dependence on current year hydrology in Northern California and prior year storage in SWP reservoirs). When sufficient imported water is not available, the balance is met with local groundwater provided by the purveyors and from water banking programs.

It is anticipated that water demands will continue to increase. Accordingly, additional reliable sources of water are necessary to meet projected water demands. CLWA recognizes that recycled water is an important and reliable source of additional water. Recycled water enhances reliability in that it provides an additional source of supply and allows for more efficient utilization of groundwater and imported water supplies. Draft Recycled Water System Master Plans for the CLWA service area were completed in 1993 and 2002. These master plans considered significant developments affecting recycled water sources, supplies, users and demands so that CLWA could develop a cost-effective recycled water system within its service area. In 2007, CLWA completed California Environmental Quality Act (CEQA) analysis of the 2002 Recycled Water Master Plan (Recycled Plan). This analysis consisted of a Program Environmental Impact Report (EIR) covering the various phases for a recycled water system as outlined in the Recycled Plan. The Program EIR was certified by the CLWA Board in March 2007.

CLWA has constructed Phase I of the Recycled Plan, which can deliver 1,700 afy of water to the Valencia service area. Deliveries of recycled water began in 2003 for irrigation water supply at a golf course and in roadway median strips. In 2009, recycled water deliveries were 328 af.

Overall, the Recycled Plan, along with the Newhall Ranch Specific Plan project, is expected to ultimately recycle up to 22,800 af of treated (tertiary) wastewater suitable for reuse on golf courses, landscaping, and other non-potable uses.

In 2009, CLWA completed a preliminary design report on the second phase of the Recycled Plan (Phase 2A) that will take water from the Saugus WRP and distribute it to identified users to the north, across the Santa Clara River and then to the west and east. Customers included in the Phase 2A expansion will be Santa Clarita Central Park and the Bridgeport and River Village developments. Large irrigation

customers will be served with this expansion with a collective design that will increase recycled water deliveries by 500 afy.

Recycled water will be further expanded with the South End Recycled Water project (Phase 2C). Valencia has initiated project design expanding the existing recycled water transmission and distribution system southerly to supply recycled water to additional customers as well as to potentially supply a source of recycled water to customers of adjacent water agencies. Phase 2C of the Recycled Plan will result in the use of 910 afy of recycled water.

Water Quality (2010 UWMP, Section 5)

This section provides a description of the water quality of the supplies within the Valley, aquifer protection and a discussion of potential water quality effects on the reliability of these supplies. It should be noted that the topic of perchlorate contamination and treatment, including information regarding perchlorate recently discovered in Valencia Well 201 in 2010, is addressed in both the 2010 UWMP and the 2010 Santa Clarita Valley Water Report. The information presented in these reports is summarized in the Mission Village Final EIR (October 2011) in **Topical Response 9: Perchlorate Treatment Update**.

The quality of any natural water is dynamic in nature. During periods of intense rainfall or snowmelt, routes of surface water movement are changed and new constituents are mobilized and enter the water while other constituents are diluted or eliminated. The quality of water changes over the course of a year. These same basic principles apply to groundwater. Depending on water depth, groundwater will pass through different layers of rock and sediment and leach different materials from those strata. Water depth is a function of local rainfall and snowmelt. During periods of drought, the mineral content of groundwater increases. Water quality is not a static feature of water, and these dynamic variables must be recognized.

Water quality regulations also change. This is the result of the discovery of new contaminants, changing understanding of the health effects of previously known as well as new contaminants, development of new analytical technology and the introduction of new treatment technology. All water suppliers are subject to drinking water standards set by the U.S. Environmental Protection Agency (USEPA) and the state Department of Public Health (DPH). Additionally, investor-owned water utilities, such as Valencia, are subject to water quality regulation by the California Public Utilities Commission (PUC). CLWA provides imported water from the SWP and other sources, while local retail water purveyors combine local groundwater with treated imported water from CLWA for delivery to their customers. (While LACWWD 36 currently exclusively takes imported water from CLWA, it anticipates bringing a groundwater well into production). An annual Consumer Confidence Report (CCR), or Water Quality

Report, is provided to all Valley residents who receive water from CLWA and one of the four retail water purveyors. That report includes detailed information about the results of quality testing of the water supplied during the preceding year (Water Quality Report 2010). Water quality also is addressed in the annual Santa Clarita Valley Water Report, which describes the current water supply conditions in the Valley and provides information about the water requirements and water supplies of the Santa Clarita Valley. The most recent version of the Water Report (2010) is summarized in the Mission Village Final EIR (October 2011), **Topical Response 8: 2010 Santa Clarita Valley Water Report**.

The quality of water received by individual customers will vary depending on whether they receive imported water, groundwater, or a blend. Some will receive only imported water at all times, while others will receive only groundwater. Others may receive water from one well at one time, water from another well at a different time, different blends of well and imported water at other times, and only imported water at yet other times. These times may vary over the course of a day, a week, or a year.

Water Demand Management Measures (2010 UWMP, Section 7)

This section describes the water Demand Management Measures (DMMs) implemented by CLWA and the retail purveyors as a part of the effort to reduce water demand in the Valley.

CLWA and the retail purveyors are subject to the UWMP Act, AB1420, and SBX7-7, in addition to the commitment of compliance with the Best Management Practices (BMPs) as signatories to the Memorandum of Understanding Regarding Water Conservation in California (MOU). In the CLWA service area, demand management is addressed at both the local (retail agency) and regional (Santa Clarita Valley-wide) levels.

The MOU and BMPs were revised by the California Urban Water Conservation Council (CUWCC) in 2008. The revised BMPs now contain a category of “Foundational BMPs” that signatories are expected to implement as a matter of their regular course of business. These include Utility Operations (metering, water loss control, pricing, conservation coordinator, wholesale agency assistance programs, and water waste ordinances) and Public Education (public outreach and school education programs). The remaining “Programmatic” BMPs have been placed into three categories: Residential, Large Landscape, and Commercial, Industrial, Institutional (CII) Programs and are similar to the original quantifiable BMPs. These revisions are reflected in the CUWCC reporting database starting with reporting year 2009 and the 2010 UWMP’s DMM compliance requirements. The new category of foundational BMPs is a significant shift in the revised MOU. For CLWA and other wholesalers, however, these changes do not represent a substantive shift in requirements.

A key intent of the recent MOU revision was to provide retail water agencies with more flexibility in meeting requirements and allow them to choose program options most suitable to their specific needs. Therefore, as alternatives to the traditional Programmatic BMP requirements, agencies may also implement the MOU Flex Track or gallons per capita per day (GPCD) options.

Under the Flex Track option, an agency is responsible for achieving water savings greater than or equal to those it would have achieved using only the BMP list items. The CUWCC has developed three Flex Track Menus – Residential, CII, and Landscape – and each provides a list of program options that may be implemented in part or any combination to meet the water savings goal of that BMP. Custom measures can also be developed and require documentation on how savings were realized and the method and calculations for estimating savings.

The GPCD option sets a water use reduction goal of 18 percent reduction by 2018. The MOU defines the variables involved in setting the baseline and determining final and interim targets. The GPCD option and requirements track well with the requirements of SBX7-7. All three retail suppliers – SCWD, Valencia, and NCWD – have chosen to implement the GPCD compliance option.

Signatories to the urban MOU are allowed by Water Code Section 10631(j) to include their biennial CUWCC BMP reports in an UWMP to meet the requirements of the DMM sections of the UWMP Act. The retail suppliers have chosen to comply with the requirements of the UWMP Act by providing the information required by the DMMs in this section of the 2010 UWMP instead of attaching the 2009 and 2010 BMP Reports. CLWA has filed its 2009 and 2010 BMP reports (attached as 2010 UWMP Appendix E).

As a wholesaler MOU signatory, CLWA assists SCWD, Valencia, and NCWD with BMP implementation and reporting. LACWWD 36 BMP implementation and reporting is done by the County of Los Angeles on behalf of all of its Waterworks Districts.

As the water wholesaler for the region, CLWA is responsible for the implementation of a subset of the BMPs. However, CLWA, in partnership with the retail water purveyors, has taken a leadership role in the implementation and support of a number of the BMPs that extend beyond a wholesaler's responsibilities in the MOU.

Water Shortage Contingency Planning (2010 UWMP, Section 8)

Water supplies may be interrupted or reduced significantly in a number of ways, such as a drought that limits supplies, an earthquake that damages water delivery or storage facilities, a regional power outage or a toxic spill that affects water quality. The 2010 UWMP, Section 8, describes how CLWA and the retail water purveyors plan to respond to such emergencies promptly and equitably.

To date, both a Water Shortage Contingency Plan and a Drought Emergency Water Sharing Agreement have been prepared by CLWA and the retail purveyors. Prohibitions, penalties, and financial impacts of shortages have been developed by SCWD, NCWD, and Valencia and are summarized in Section 8 of the 2010 UWMP.

Topical Response 9: Perchlorate Treatment Update

Comments received on the Mission Village Draft EIR (October 2010) (Draft EIR) state that a “thorough analysis” of groundwater reliability and the potential for contamination must be completed, with particularly close attention paid to ammonium perchlorate (perchlorate) and the potential for perchlorate to spread as additional water is withdrawn from the aquifer. The County also is aware of other comments stating that facilities needed to clean up perchlorate found in groundwater in the Santa Clarita Valley are not in place, resulting in reduced and/or inadequate water supply for the additional housing units approved in the Santa Clarita Valley. Other comments refer to the recent detection of perchlorate in Valencia Water Company (VWC) Well 201 as confirmation that the “pump and treat” capture wells are not effective in containing the perchlorate contamination.

This response provides an update on the progress made to date in implementing the remediation and treatment of perchlorate in the Santa Clarita Valley’s groundwater supplies. As explained below, while a total of seven municipal drinking water wells have been taken out of service for varying periods of time since perchlorate was first detected in the groundwater in 1997, five of these wells either have been returned to service with incorporation of perchlorate treatment facilities or replaced by new wells drawing from the non-impacted portion of the groundwater basin. The five wells collectively restore much of the temporarily lost well capacity, and an additional two wells will be drilled to fully restore the operational flexibility that existed prior to the detection of perchlorate. With respect to Well 201, VWC plans to actively seek remediation and restore the impacted well capacity in the near term. The current removal of Well 201 from service does not limit the reliability of the water supply since there is sufficient capacity in Saugus wells to meet water supply projections during the period required for its restoration.

Thus, substantial progress has been made in responding to the detection of perchlorate, and substantial facilities needed for remediation/treatment are in place and actively monitored by the Castaic Lake Water Agency (CLWA), the local retail purveyors, and several regulatory agencies. The available evidence supports the conclusion reached in the Mission Village Draft EIR that there is an adequate water supply available to serve the projected future needs of the proposed Mission Village project and other existing and planned development in the Santa Clarita Valley.

The response presented below is based, in part, on the information presented in Section 4.8, Water Services, of the Mission Village Draft EIR, which is summarized below. This response also is based on updated information received from CLWA and other retail water purveyors in the Santa Clarita Valley since the Mission Village Draft EIR was made available for public review in October 2010. The updated information includes the *2010 Urban Water Management Plan* (2010 UWMP; June 2011) recently adopted

by CLWA and the retail water suppliers in the Santa Clarita Valley, and the recently released 2010 *Santa Clarita Valley Water Report* (2010 Water Report; June 2011) prepared by the Santa Clarita Valley water purveyors. Both the 2010 UWMP and the 2010 Water Report are found in **Appendix F4.8(A)** of the Mission Village Final EIR (October 2011).

Background

Perchlorate, a chemical used in making rocket and ammunitions propellants, has been a water quality concern in the Santa Clarita Valley since 1997 when it was originally detected in four Saugus Formation wells (V-157, Saugus 1, Saugus 2, and NC-11) operated by the retail water suppliers in the eastern part of the Saugus Formation, near the former Whittaker-Bermite munitions facility. In late 2002, the contaminant was detected in a fifth well, an Alluvial well (Stadium Well) located near the former Whittaker-Bermite site. Perchlorate was detected again in early 2005 in a second Alluvial well (Well Q2), also located near the former Whittaker-Bermite site.⁶⁰

At the time the Mission Village Draft EIR was circulated for public review in October 2010, three of the six wells remained as perchlorate-impacted - Saugus 1 and 2, and NC-11. The Alluvial Stadium well and Saugus well V-157 had been abandoned and replacement wells were installed in a non-impacted portion of the basin. As to Well Q2, an approved perchlorate treatment system was installed in 2005 and the well subsequently was returned to service.⁶¹ As explained below, Saugus 1 and 2 are subject to treatment and are in service.

Mission Village Draft EIR Summary

The Mission Village Draft EIR presented substantial information regarding perchlorate contamination, remediation, and treatment in the Santa Clarita Valley.⁶² The Mission Village Draft EIR also analyzed potential impacts to water resources, including the potential for the proposed Mission Village project to cause the migration of perchlorate in groundwater beyond the currently affected wells in the Santa Clarita Valley.⁶³ In addition, the Mission Village Draft EIR identified a number of technical documents found in the appendices to the Mission Village Draft EIR, as well as other documents incorporated by

⁶⁰ In 2006, perchlorate was detected in very low concentrations (below the detection limit for reporting) in well NC-13 located near one of the originally impacted wells. Perchlorate levels at the well have not exceeded the maximum contaminant level (MCL) of 6 ug/l adopted by the Department of Public Health in 2007 and, therefore, the well has remained in service.

⁶¹ 2010 UWMP, pages 5-2 and 5-3.

⁶² Please refer to Mission Village Draft EIR, pp. 4.8-5 through 4.8-7, 4.8-21 through 4.8-65, and 4.8-123 through 4.8-127.

⁶³ Mission Village Draft EIR, pages 4.8-41 through 4.8-64.

reference and made available for public review, that provide perchlorate-related contamination and treatment information and analysis. For example, the Mission Village Draft EIR used and relied upon the following documents:

1. *Analysis of Groundwater Supplies and Groundwater Basin Yield, Upper Santa Clara River Groundwater Basin, East Subbasin*, by Luhdorff & Scalmanini and GSI Water Solutions, Inc., August 2009;
2. Summary Report to Department of Toxic Substances Control (DTSC) from AMEC Geomatrix regarding Former Whittaker-Bermite Facility, Santa Clarita, California, November 17, 2008;
3. 2006, 2007, 2008 and 2009 Santa Clarita Valley Water Reports;
4. *Analysis of Groundwater Basin Yield, Upper Santa Clara River Groundwater Basin, East Subbasin, Los Angeles County, California*, prepared by CH2M HILL, in cooperation with Luhdorff & Scalmanini, in support of the August 2001 Memorandum of Understanding between the Upper Basin Water Purveyors and the United Water Conservation District August 2005;
5. 2005 Urban Water Management Plan, prepared by CLWA and other retail water purveyors; and
6. Interim Remedial Action Plan, prepared by Kennedy-Jenks Consultants for CLWA and approved by California DTSC, December 2005.

Copies of the above documents are provided in the 2010 Mission Village Draft EIR, Appendix 4.8.

The analysis presented in the Mission Village Draft EIR took into account numerous factors affecting water supplies in the Santa Clarita Valley, including perchlorate-impacted wells. It also accounted for the perchlorate-impacted wells in the groundwater basin⁶⁴ (*i.e.*, both the Alluvial aquifer and the Saugus Formation as described below), and analyzed the data derived from ongoing monitoring by water purveyors, wellhead treatment, and construction of new replacement wells in areas not impacted by perchlorate. After consideration of the factors discussed above, and based on information received from CLWA and other retail water purveyors in the Santa Clarita Valley, the Mission Village Draft EIR determined that an adequate supply of water exists in the Santa Clarita Valley to meet the needs of its residents now and in the future:

“Table 4.8-11, Summary of Current and Planned Water Supplies and Banking Programs, summarizes the existing and planned water supplies and banking programs for the CLWA service area... Diversity of supply allows CLWA and the local retail purveyors the option of drawing on multiple sources of supply in response to changing

⁶⁴ The groundwater basin is identified in DWR Bulletin 118 (2003 Update) as the Santa Clara River Valley Groundwater Basin, East Subbasin. The basin is comprised of two aquifer systems, the Alluvium (also referred to as the Alluvial aquifer) and the Saugus Formation. The Alluvium generally underlies the Santa Clara River and its several tributaries, and the Saugus Formation underlies practically the entire Upper Santa Clara River area.

conditions, such as varying weather patterns (average/normal years, single-dry years, multiple dry years), fluctuations in delivery amounts of SWP water, natural disasters, perchlorate-impacted wells, and other factors. *Based on CLWA's conservative water supply and demand assumptions over the next 20 years (i.e., through 2030 as described in the 2005 UWMP), in combination with conservation of non-essential demand during certain dry years, the water supply plan described in the 2005 UWMP achieves CLWA's and the local retail purveyors' goal of delivering reliable and high-quality water supply for their customers, even during dry periods.* [Footnote omitted]."⁶⁵ (Italics added.)

The Mission Village Draft EIR contained a detailed description of groundwater supplies in the Santa Clarita Valley, including graphics depicting both the mapped extent of the Santa Clara River Valley East Subbasin, which is comprised of the Alluvium/Alluvial aquifer and the Saugus Formation, and the locations of the Alluvium and Saugus Formation municipal-supply well locations.⁶⁶ It also described the groundwater operating plan "developed by CLWA and the local retail purveyors over the past 20 years to meet water requirements (municipal, agricultural, small domestic), while maintaining the groundwater basin in a sustainable condition (i.e., no long-term depletion of groundwater or interrelated surface water)."⁶⁷ The groundwater operating plan addressed groundwater contamination issues in the basin, consistent with CLWA's Groundwater Management Plan (GWMP).⁶⁸ This operating plan quantifies annual pumping volumes (in ranges) from the Alluvium and Saugus Formation.⁶⁹ Historical and projected groundwater pumping by the retail water purveyors is also provided in the document.⁷⁰

In addition, the Mission Village Draft EIR identified the three factors affecting the availability of groundwater supplies under the groundwater operating plan, which are: "(1) sufficient source capacity (wells and pumps); (2) sustainability of the groundwater resource to meet pumping demand on a renewable basis; and (3) protection of groundwater sources (wells) from known contamination, or provisions for treatment in the event of contamination."⁷¹ The Mission Village Draft EIR analyzed each factor for both the Alluvial aquifer and the Saugus Formation, as summarized below.⁷²

Alluvial Aquifer

⁶⁵ Mission Village Draft EIR, pp. 4.8-92-4.8-93

⁶⁶ Mission Village Draft EIR, pp. 4.8-21 through 4.8-65.

⁶⁷ Mission Village Draft EIR, p. 4.8-3.

⁶⁸ Mission Village Draft EIR, pp. 4.8-25 through 4.8-28.

⁶⁹ Mission Village Draft EIR, p. 4.8-3.

⁷⁰ Mission Village Draft EIR, pp. 4.8-33 through 10.3-34 (**Tables 4.8-3 and 4.8-4**).

⁷¹ Mission Village Draft EIR, p. 4.8-33.

⁷² Mission Village Draft EIR, pp. 4.8-34 through 4.8-64.

For the Alluvial aquifer, the Mission Village Draft EIR determined that there was more than adequate pumping capacity from active wells (not contaminated by perchlorate) to meet the purveyors' groundwater operating plan, and such capacity did not include the one Alluvial well (Stadium well) that has been inactivated due to perchlorate contamination:

“For municipal water supply, with existing wells and pumps, the three retail water purveyors with Alluvial wells (NCWD, SCWD, and VWC) have a combined pumping capacity from active wells (not contaminated by perchlorate) of 38,600 afy. Alluvial pumping capacity from all the active municipal supply wells is summarized in **Table 4.8-5, Pumping Rates Simulated for Individual Alluvial Aquifer Wells under the 2008 Groundwater Operating Plan**. The locations of the various municipal Alluvial wells throughout the Basin are illustrated on **Figure 4.8-4, Municipal Alluvial Well Locations; Santa Clara River Valley, East Groundwater Subbasin**. As indicated, the pumping capacity of the SCWD Stadium well (deactivated due to the perchlorate contamination), representing another 800 afy of pumping capacity, has been transferred to the Valley Center well.”⁷³

The Mission Village Draft EIR also analyzed the sustainability or renewability of alluvial groundwater, finding that:

“The Alluvial aquifer is considered a sustainable water supply source to meet the Alluvial portion of the operating plan for the Basin. This is based on the combination of actual experience with Alluvial aquifer pumping at capacities similar to those planned for the future and the resultant sustainability (recharge) of groundwater levels and storage, and further based on modeled projections of aquifer response to planned pumping rates that also show no depletion of groundwater.”⁷⁴

After addressing pumping capacity and long-term sustainability of the Alluvial aquifer, the Mission Village Draft EIR described protection of groundwater sources (wells) from known contamination, including perchlorate, and the plans in place to ensure aquifer protection:

“The remaining key consideration related to current and future use of the Alluvium is the impact of perchlorate contamination. Extensive investigation of the extent of perchlorate contamination, combined with the groundwater modeling previously described, has led to the current plan by CLWA and the retail purveyors, which call for restoration of impacting pumping (well) capacity and integrated control of contamination migration. In the short term, the response plan for Alluvial production wells, located down gradient of the former Whittaker-Bermite site, was to promptly install wellhead treatment to ensure adequate water supplies. This plan was effectively implemented in 2005 by Valencia Water Company through the permitting and

⁷³ Mission Village Draft EIR, pp. 4.8-41.

⁷⁴ Mission Village Draft EIR, p. 4.8-44.

installation of wellhead treatment at Valencia Water Company's Well Q2. After returning the well to service with wellhead treatment in October 2005, followed by nearly two years of operation with wellhead treatment, during which there was no detection of perchlorate, Valencia Water Company was authorized by the California Department of Public Health to discontinue treatment. Since that time, Well Q2 has been operating without treatment and there has been no detection of perchlorate since the wellhead treatment was discontinued. As a result, Well Q2 remains a part of the Valley's active municipal groundwater source capability.

The purveyors' response plan also addressed the impacted Alluvial production well owned by SCWD (Stadium Well), which was shut down due to the detection of perchlorate in 2002. In response, SCWD recently drilled a replacement well (Valley Center Well) to the east, north-northeast of the former Whittaker-Bermite site. The Valley Center Well also will be a part the Valley's active municipal groundwater source capability.

As discussed below, the long-term plan includes the CLWA groundwater containment, treatment, and restoration project to prevent further downstream migration of perchlorate, the treatment of water extracted as part of that containment process, and the recovery of lost local groundwater production from the Saugus Formation."⁷⁵

Saugus Formation

For the Saugus Formation, the Mission Village Draft EIR determined that there was more than adequate pumping capacity from active wells (not contaminated by perchlorate) to meet the purveyors' groundwater operating plan in both normal and dry years:

"In terms of adequacy and availability, the combined active Saugus groundwater source capacity of municipal wells of up to 19,125 afy, is more than sufficient to meet the planned use of Saugus groundwater in normal years of 7,500 to 15,000 afy. This currently active capacity is more than sufficient to meet water demands, in combination with other sources, if both of the next two years are dry. At that time, the combination of currently active capacity and restored impacted capacity, through a combination of treatment at two of the impacted wells and replacement well construction, will provide sufficient total Saugus capacity to meet the planned use of Saugus groundwater during multiple dry-years of 35,000 af, if that third year is also a dry year."⁷⁶

The Mission Village Draft EIR also analyzed the sustainability or renewability of Saugus groundwater, finding the following:

⁷⁵ Mission Village Draft EIR, p. 4.8-44.

⁷⁶ Mission Village Draft EIR, p. 4.8-46.

“To examine the yield of the Saugus Formation or, its sustainability on a renewable basis, the groundwater flow model was used to examine long-term projected response to pumping from both the Alluvium and the Saugus over the 78-year period of hydrologic conditions using alternating wet and dry periods as have historically occurred. The pumping simulated in the model was in accordance with the operating plan for the Basin. For the Saugus, simulated pumpage included the planned restoration of recent historic pumping from the perchlorate-impacted wells. In addition to assessing the overall recharge of the Saugus, that pumping was analyzed to assess the effectiveness of controlling the migration of perchlorate by extracting and treating contaminated water close to the source of contamination.

Simulated Saugus Formation response to the ranges of pumping under assumed recurrent historical hydrologic conditions is consistent with actual experience under smaller pumping rates. The response consists of: (1) short-term declines in groundwater levels and storage near pumped wells during dry-period pumping; (2) rapid recovery of groundwater levels and storage after cessation of dry-period pumping; and (3) no long-term decreases or depletion of groundwater levels or storage. The combination of actual experience with Saugus pumping and recharge up to about 15,000 afy, now complemented by modeled projections of aquifer response that show long-term utility of the Saugus at 7,500 to 15,000 afy in normal years and rapid recovery from higher pumping rates during intermittent dry periods, shows that the Saugus Formation can be considered a sustainable water supply source to meet the Saugus portion of the operating plan for the Basin.”⁷⁷

After addressing pumping capacity and long-term sustainability of the Saugus Formation, the Mission Village Draft EIR described protection of groundwater sources (wells) from known contamination, including perchlorate, and the plans in place to ensure aquifer protection:

“The operating plan for the Saugus Formation accounts for historical perchlorate detections and the resulting containment and remedial response activities that are being constructed at this time. As described in further detail below, in 1997, a total of four Saugus production wells were inactivated for water supply service due to the presence of perchlorate. The four Saugus wells removed from service were as follows: (a) two Saugus production wells owned by SCWD (Saugus wells 1 and 2); (b) one Saugus production well owned by NCWD (NCWD Well 11); and (c) one Saugus production well owned by Valencia Water Company (VWC Well 157).

As part of the ongoing implementation of perchlorate containment and restoration of impacted capacity, VWC Well 157 was abandoned in January 2005 and replaced by new Well VWC 206 in a non-impacted portion of the basin. Thus, the Saugus capacity analysis includes planned pumping from replacement Well VWC 206.

⁷⁷ Mission Village Draft EIR, pp. 4.8-46 through 4.8-47.

The longer range plan of CLWA and the purveyors has been to pursue a project to contain further downstream migration of perchlorate from the former Whittaker-Bermite site, treatment and subsequent use of the pumped water from the containment process for water supply, and installation of replacement wells in non-impacted portions of the basin to restore the remainder of groundwater supply impacted by perchlorate.⁷⁸

CLWA/Purveyor Implementation Plan for Perchlorate-Impacted Alluvial and Saugus Wells

Importantly, the Mission Village Draft EIR assessed the perchlorate-impacted Alluvial and Saugus wells, based on the best available information provided by CLWA and other retail purveyors in the Santa Clarita Valley. This analysis focused on the status of the implementation plan developed by CLWA and the local retail purveyors to restore well capacity impacted by perchlorate. The CLWA/retail purveyor implementation plan includes a combination of treatment facilities and replacement wells, and is underway. The Mission Village Draft EIR provided extensive information concerning this implementation plan and its status. For example, the Mission Village Draft EIR disclosed that treatment facilities have been constructed and are either in operation or are close to becoming operational:

“Since the detection of perchlorate in the four Saugus wells in 1997, CLWA and the retail water purveyors have recognized that one element of an overall remediation program would most likely include pumping from impacted wells, or from other wells in the immediate area, to establish hydraulic conditions that would control the migration of contamination from further impacting the aquifer in a downgradient (westerly) direction. Thus, CLWA and the retail water purveyors report that the overall perchlorate remediation program includes dedicated pumping from some or all of the impacted wells, with appropriate treatment, such that two objectives could be achieved. The first objective is control of subsurface flow and protection of downgradient wells, and the second is restoration of some or all of the contaminated water supply. Not all impacted capacity is required for control of groundwater flow. The remaining capacity would be replaced by construction of replacement wells at non-impacted locations.

In cooperation with state regulatory agencies and investigators working for Whittaker-Bermite, CLWA and the local retail water purveyors developed an off-site plan that focuses on the concepts of groundwater flow control and restored pumping capacity and is compatible with on-site and possibly other off-site remediation activities. Specifically relating to water supply, the plan includes the following:

- Constructing and operating a water treatment process that removes perchlorate from two impacted wells such that the produced water can be used for municipal supply.

⁷⁸ Mission Village Draft EIR, p. 4.8-47.

- Hydraulically containing the perchlorate contamination that is moving from the Whittaker-Bermite site toward the impacted wells by pumping the wells at rates that will capture water from all directions around them.
- Protecting the downgradient non-impacted wells through the same hydraulic containment that results from pumping two of the impacted wells.
- Restoring the annual volumes of water pumped from the impacted wells before they were inactivated and also restoring the wells' total capacity to produce water in a manner consistent with the retail water purveyors' operating plan for groundwater supply described above.

The two key activities that comprise the majority of effort required for implementation of the plan are general facilities-related work (design and construction of well facilities, treatment equipment, pipelines, etc.) and permitting work. Both activities are planned and scheduled concurrently, resulting in planned completion (i.e., restoration of all impacted capacity) in 2010. Notable accomplishments toward implementation include completion of the Final Interim Remedial Action Plan (RAP) and associated environmental review with the adoption of a Mitigated Negative Declaration in September 2005, and various implementation activities from 2007–2009. Completion of the CLWA containment plan is expected in June 2010.

In light of the preceding, as to the adequacy of groundwater as the local component of water supply for the Santa Clarita Valley, the impacted capacity of the three wells will remain unavailable through 2010, during which time the non-impacted groundwater supply will be sufficient to meet near-term water requirements as described above. With the restoration of the wells, the total groundwater capacity will be sufficient to meet the full range of normal and dry-year conditions as provided in the CLWA/retail water purveyor groundwater operating plan for the Basin.^{79,80}

In addition, the Mission Village Draft EIR disclosed that substantial funding for perchlorate remediation/treatment is currently in place:

“In May 2007, the Water Purveyors announced a settlement of their lawsuit against Whittaker to contain and remove perchlorate from the Santa Clarita Valley's groundwater aquifers. The Water Purveyors estimate this settlement provides up to \$100 million to address the problem. The underlying litigation was dismissed by the US District Court in August 2007. See Draft EIR **Appendix 4.8** which contains the following documents: (1) *Castaic Lake Water Agency Litigation Settlement Agreement*, (2) *Order Granting Joint Motion for Court Approval, Good Faith Settlement Determination and Entry of*

⁷⁹ Mission Village Draft EIR, pp. 4.8-124 through 4.8-125.

⁸⁰ As further discussed below, in January 2011, following release of the Mission Village Draft EIR, two of the three referenced wells (Saugus 1 and Saugus 2) were placed back in service following commencement of operation of CLWA's Saugus Perchlorate Treatment Facility.

Consent Order July 16, 2007, and (3) Stipulation to Dismiss Plaintiffs' Claims and Defendants' Counterclaim, August 20, 2007.

The Settlement Agreement provides funding to construct replacement wells, pipelines, and a treatment plant to remove perchlorate. The Settlement Agreement also provides funds to operate and maintain the treatment system for up to 30 years, which is estimated to cost as much as \$50 million over the life of the project. The treatment plant has been designed by CLWA and the Settlement Agreement provides \$1.7 million to reimburse CLWA for past expenditures. In addition, a \$10 million "rapid response fund" will be established to allow the water purveyors to immediately treat threatened wells that could become impacted by perchlorate contamination in the future. VWC received a total of \$3.5 million under the Settlement Agreement which included \$2.5 million for past environmental claims and \$1.0 million to close and abandon V-157 and drill replacement well V-206.

Following the settlement of the litigation, VWC and the other water purveyors entered into two separate agreements, each formally prepared as a Memorandum of Understanding (MOU). These MOUs were necessary to implement the various obligations under the Settlement Agreement. The first MOU sets forth the rights among the water purveyors to receive payments pursuant to the Settlement Agreement and clarifies project administration which includes such things as project modification, future perchlorate detections, monitoring, payment of ongoing legal fees, dispute resolution and other provisions described in the Settlement Agreement. The second MOU sets forth the operational plan and financial arrangements to deliver certain quantities of groundwater from the perchlorate treatment system and a future replacement well field that in total, would restore the water supply capacity impacted by perchlorate to SCWD and NCWD. Both MOUs are included in Draft EIR **Appendix 4.8.**⁸¹

Further, the Mission Village Draft EIR analyzed the groundwater quality of both the Alluvial aquifer and the Saugus Formation, including perchlorate contamination and that analysis did not identify any significant impacts associated with the perchlorate-impacted wells in the Santa Clarita Valley.⁸² It also identified the perchlorate treatment technology, which is effective in treating perchlorate in water in order to meet drinking water standards.⁸³ Based on the results of CLWA's investigation of perchlorate removal technologies, approval of ion exchange treatment technology in other settings by the California Department of Public Health (DPH), and the successful wellhead treatment installed at Valencia Water Company's (VWC's) Well Q2, the Mission Village Draft EIR further disclosed that CLWA is currently utilizing the ion exchange technology for the restoration of impacted capacity (wells) in accordance with

⁸¹ Mission Village Draft EIR, p. 4.8-51.

⁸² Mission Village Draft EIR, pp. 4.8-53 through 4.3-59.

⁸³ Mission Village Draft EIR, pp. 4.8-59 through 4.8-62.

the permitting, testing, and installation process as described in the 2005 UWMP and other published reports issued by CLWA.⁸⁴

In the discussion of impacts of the proposed Mission Village project, the Mission Village Draft EIR identified significance criteria specific to the proposed project and its alternatives as it relates to the presence of perchlorate in groundwater supplies. The significance criteria used in the Mission Village Draft EIR stated that, given the presence of perchlorate created by other land uses in the Santa Clarita Valley (former Whittaker-Bermite site); impacts to water resources would be significant if implementation of the proposed Project would:

- “Result in the spreading of perchlorate in groundwater beyond the wells currently affected by perchlorate.”⁸⁵

The Mission Village Draft EIR then analyzed the project impacts on water supplies based on the above significance criteria.⁸⁶ The Mission Village Draft EIR determined that:

“The groundwater model... was adaptable to analyze both the sustainability of groundwater under an operational scenario that includes full restoration of perchlorate-contaminated supply and the containment of perchlorate near the Whittaker-Bermite property (i.e., by pumping some of the contaminated wells). In 2004, DTSC reviewed and approved the development and calibration of the regional model. After DTSC approval, the model was used to simulate the capture and control of perchlorate by restoring impacted wells, with treatment. The results of that work are summarized in a report entitled, Analysis of Perchlorate Containment in Groundwater Near the Whittaker-Bermite Property, Santa Clarita, California (CH2MHill, December 2004) (see Draft EIR **Appendix 4.8**), and is summarized in the 2009 Basin Yield Update (Draft EIR **Appendix 4.8**). The modeling analysis indicates that the pumping of impacted wells SCWD-Saugus 1 and SCWD-Saugus 2 on a nearly continual basis will effectively contain perchlorate migrating westward in the Saugus Formation from the Whittaker-Bermite property. The modeling analysis also indicates that: (1) no new production wells are needed in the Saugus Formation to meet the perchlorate containment objective; (2) impacted well NCWD-11 is not a required component of the containment program; and (3) pumping at SCWD-Saugus 1 and SCWD-Saugus 2 is necessary to prevent migration of perchlorate to other portions of the Saugus Formation. This report, and the accompanying modeling analysis, was approved by DTSC in November 2004. With that approval, the model is now being used to support the source water assessment and the balance of the permitting process required by DPH.

⁸⁴ Mission Village Draft EIR, pp. 4.8-59 through 4.8-62.

⁸⁵ Mission Village Draft EIR, p. 4.8-116.

⁸⁶ Mission Village Draft EIR, pp. 4.8-116 through 4.8-127.

Based on the progress made to date, the provision of groundwater to the Mission Village project site from urban uses would not result in the spread of perchlorate in the Basin beyond the currently impacted wells because: (a) there will not be a net increase in groundwater usage due to the conversion of agricultural water to potable supply uses for the Mission Village project site (see Specific Plan Mitigation Measure 4.11-15); (b) the agricultural groundwater used to meet the needs of the Mission Village project site must meet the drinking water quality standards required by law prior to use (see Specific Plan Mitigation Measure 4.11-16); and (c) the wells expected to serve the Mission Village project site are located within the Specific Plan site, or very near the site at the Valencia Commerce Center; the wells are not impacted by perchlorate based on laboratory test results; and they are located over 4 miles west of the former Whittaker-Bermite site.⁸⁷

August 2010 Perchlorate Detection - VWC Well 201

In August 2010, perchlorate was detected in Saugus Formation Well 201 in levels below the regulatory standard. The Valencia Water Company, the owner and operator of Well 201, immediately took the well out of service and notified the state DPH of the detection. DPH directed Valencia Water Company to perform quarterly testing at the inactive well to track perchlorate levels. Nonetheless, Valencia Water Company voluntarily elected to perform monthly testing.

In April 2011, Valencia Water Company had gathered sufficient data to conclude that: (1) the perchlorate levels at Well 201 were above the adopted MCL on a regular basis; and (2) remediation would be required. Therefore, Valencia Water Company notified CLWA, the other water purveyors, the County, the City, and others that the inactivated well was impacted by perchlorate at levels over the regulatory standard. Valencia Water Company also requested that Well 201's supply be excluded from the 2010 UWMP's supply calculations until the well is fully remediated and operational. Valencia Water Company took this action to ensure that the 2010 UWMP would adequately address the impacted well.

As discussed above, the Draft EIR, Section 4.8, Water Service, contains considerable information and analysis of the perchlorate detected in certain municipal supply wells in both the Saugus Formation and the Alluvial aquifer. This analysis disclosed the detection of perchlorate, and addressed treatment, well capacity, and groundwater availability and reliability. The analysis also contemplated that other wells could be impacted and that wellhead treatment had been permitted and installed at wells in the Santa Clarita Valley groundwater basin and that the treatment removes perchlorate pumped from the well to a non-detect level. Applying the impact significance criteria set forth in Section 4.8, it was determined that the proposed Mission Village project would not give rise to significant impacts relative to the perchlorate-impacted groundwater in the basin.

⁸⁷ Mission Village Draft EIR, p. 4.8-127.

The EIR's analysis concerning perchlorate impacts are consistent with the information presented in the 2010 UWMP. The 2010 UWMP evaluated perchlorate-impacted groundwater supplies in terms of the overall availability and reliability of those supplies, and found that non-impacted municipal supply wells can be relied upon to meet the quantities of water projected to be available from both the Alluvial aquifer and the Saugus Formation during the time needed to restore perchlorate-impacted wells, including Well 201.⁸⁸ Therefore, based on the 2010 UWMP and related documents, the detection of perchlorate in Well 201 is not considered "new information" that would affect the quality of the human environment in a significant manner or to a significant extent not already considered in the EIR and record.

The County is aware of comments that include "recommendations" and requests that go beyond the County's jurisdictional purview and the scope of the approvals sought by the project applicant. More specifically, the County has no authority to remove Well 201 from service - these groundwater sources are determined by the Santa Clarita Valley water agencies/suppliers. (The well also is out-of-service; and has been out-of-service since August 2010.) Similarly, as the project applicant is not responsible for water quality testing, there is no mechanism by which the County can require monthly testing at Well 201 or any other well; again, that is a matter within the jurisdictional controls of the local water agencies/suppliers and other regulatory agencies (*e.g.*, DPH).

By letter dated June 8, 2011, Valencia Water Company informed the County that Valencia plans to actively seek remediation of Well 201 under the Whittaker-Bermite perchlorate litigation settlement agreement and rapidly restore the impacted well capacity by either replacing the well or providing wellhead treatment. (A copy of Valencia Water Company's letter, dated June 8, 2011, is included in Final EIR (October 2011), **Appendix F4.8(A)**.) Given Valencia Water Company's experience of: (1) bringing its Well Q2 back into production; (2) actions under DPH 97-005 Policy Memo; (3) bringing treatment facilities on-line for the Saugus 1 and Saugus 2 wells; and (4) replacing capacity for its Well 157, Valencia has determined that it could either install wellhead treatment to bring Well 201 back into service or replace the capacity with a new well within two years. This time estimate is conservative because of Valencia Water Company's prior success in 2005 in restoring Well Q2 to municipal-supply service within an approximate six-month period. There also are now funds in place to remediate Well 201 upon the permitting and installation of wellhead treatment, or replacement of Well 201's capacity with a new replacement well. Nonetheless, as discussed below, the final 2010 UWMP does not rely on Well 201 as an active groundwater source; that is, Well 201's capacity was not included in the active groundwater sources described in the text or tables of the 2010 UWMP, but instead identified as planned restored capacity.

⁸⁸ 2010 UWMP, Appendix I, *Perchlorate Contamination and Impact on Water Supplies in the Santa Clarita Valley*.

As to testing, on August 4, 2011, DPH sent letters to both Valencia Water Company and Newhall County Water District (NCWD) requesting that both entities increase perchlorate monitoring from annually to quarterly at specified wells. Valencia Water Company has provided written confirmation that it will conduct the perchlorate monitoring quarterly as requested by DPH and that NCWD plans to do the same; therefore, adequate oversight from the appropriate regulatory agency is in place. (The August 4, 2011 letters from DPH and the August 24, 2011 e-mail from Tom Worthington, Impact Sciences, Inc. to the County Department of Regional Planning are included in the Mission Village Final EIR [October 2011], **Appendix F4.8(A).**)⁸⁹

Perchlorate Remediation and Treatment in The Santa Clarita Valley

Substantial progress has been made in terms of perchlorate remediation/treatment in the Santa Clarita Valley, all of which has been conducted in cooperation with CLWA, local retail water purveyors, City of Santa Clarita, the U.S. Army Corps of Engineers (CORPS), California DPH, DTSC, Los Angeles County Department of Public Works (DPW), community groups, Whittaker Corporation, and numerous consultants, contractors, supplies and others.⁹⁰

For example, work toward the ultimate remediation of perchlorate contamination, including the restoration of impacted groundwater supply, continued to progress in 2010, with a focus on the construction of facilities to implement a jointly developed plan to “pump and treat” contaminated water from two of the originally impacted wells (Saugus 1 and Saugus 2) to minimize migration of the contaminant plume, and to deliver treated water for municipal supply to partially replace impacted well capacity.

In September 2009, CLWA, in partnership with other local retail purveyors and the City of Santa Clarita, completed construction of CLWA’s Saugus Perchlorate Treatment Facility (SPTF), a \$13 million facility located near Bouquet Canyon Road and the Santa Clara River to treat perchlorate in groundwater emanating from the Whittaker-Bermite property site. The SPTF is designed to restore groundwater production capacity impacted by perchlorate contamination and stop the migration of perchlorate from the site of the former munitions facility. The SPTF is part of the larger regulatory program, which

⁸⁹ With respect to trichloroethylene (TCE) and tetrachloroethylene (PCE), TCE and PCE have been detected in Saugus wells at below the MCL for both contaminants. DPH has determined “the presence of TCE and PCE in Saugus wells does not pose an unacceptable health risk at the concentrations and failure scenarios considered above, provided that CLWA follows monitoring and blending requirements established in the permit conditions.” (*Saugus Perchlorate Treatment Facility Project Evaluation Summary* (November 10, 2010).)

⁹⁰ As stated in Mission Village Draft EIR, **Section 4.22**, Water Quality, no perchlorate has ever been detected in the project area.

includes the restoration of the Saugus 1 and Saugus 2 wells, to extract contaminated groundwater and control the migration of perchlorate in the Saugus Formation aquifer. The cost of that “pump and treat” system also is covered under the 2007 settlement agreement, which protects the public from paying for the remediation costs.

DPH issued an amendment to CLWA’s Operating Permit in December, 2010, and the Saugus 1 and 2 wells were placed back in service in January 2011. Through this reactivation, CLWA’s SPTF is now online, with numerous monitoring tests performed each week to ensure the safety of the water leaving the plant. The water purveyors continue to have sufficient pumping capacity to meet the planned normal range of Saugus pumping as described in the 2010 UWMP.⁹¹

As to those comments stating that the detection of perchlorate at Well 201 supports the conclusion that the “pump and treat” protocol being employed at Saugus 1 and Saugus 2 has been unsuccessful, the evidence indicates that the “pump and treat” program is endorsed by the relevant state agency (DPH), and has been successful in containing the spread of perchlorate in the basin.

As noted in the 2010 UWMP, returning impacted wells to municipal water supply service via the installation of treatment facilities:

“requires DPH approval before the water can be considered potable and safe for delivery to customers. The permit requirements are contained in DPH Policy Memo 97-005 for direct domestic use of impaired water sources.

Before issuing a permit to a water utility for use of an impaired source as part of the utility’s overall water supply permit, DPH requires that studies and engineering work be performed to demonstrate that pumping the well and treating the water will be protective of public health for users of the water. The Policy Memo 97-005 requires that DPH review the local retail water purveyor’s plan, establish appropriate permit conditions for the wells and treatment system, and provide overall approval of returning the impacted wells to service for potable use.”⁹²

As DPH approved the return of Saugus 1 and Saugus 2 to operation, and approved the Final Interim Remedial Action Plan for containment and extraction of perchlorate in January 2006, the state agency necessarily determined that the local water agencies had devised a treatment approach that adequately contains the perchlorate contamination and is protective of public health; otherwise, DPH would not have authorized and permitted the Saugus 1 and 2 “pump and treat” program.

⁹¹ 2010 Water Report, p. ES-5.

⁹² 2010 UWMP, p. 5-4.

Pursuant to page 5-3 of the 2010 UWMP, Saugus 1 and 2 operate at a continuous pumping rate of 1,100 GPM at each well, for a combined total of 2,200 GPM from the two wells. This continuous pumping rate was studied in two documents issued by Kennedy/Jenks Consultants: (1) the *Final Draft Interim Feasibility Study* (dated August 12, 2005); and (2) the *Interim Remedial Action Plan* (dated December 29, 2005). Both documents observe that sub-regional groundwater modeling developed and calibrated by CH2MHill indicated that “a pumping rate of 1,100 gallons per minute (gpm) for each of Saugus 1 and Saugus 2 should be sufficient to contain Saugus Formation groundwater impacted by perchlorate and prevent further migration of perchlorate in the Saugus Formation groundwater.”⁹³ Accordingly, the *Action Plan* identified as its preferred alternative a project that “consists of pumping groundwater at a constant flow rate of 1,100 gpm from each of Wells Saugus 1 and 2, removing perchlorate from the groundwater using a single-pass ion exchange system, followed by disinfection and pumping the treated groundwater into an existing 84-inch treated potable water line for blending and distribution.”⁹⁴

As explained further in the 2010 UWMP:

“The groundwater model that was developed for use in analyzing the operating yield and sustainability of groundwater in the Basin was also used for simulating the capture and control of perchlorate contamination in the originally impacted Saugus wells. The results of that work are summarized in ‘Analysis of Perchlorate Containment in Groundwater Near the Whittaker- Bermite Property, Santa Clarita, California’ (CH2M Hill, December 2004). The recent detection of perchlorate in VWC Well 201 was not totally unexpected in light of the previously identified gradient for groundwater flow (westerly) from the source location and previously impacted wells. That gradient is now being controlled by the containment and extraction program that is in operation for the originally impacted wells, as discussed in this section and in Appendix I. The analysis is expected to be used in the development of the source water assessment of VWC Well 201.”⁹⁵

Appendix I of the 2010 UWMP also provides an extensive overview of the perchlorate contamination remediation efforts associated with the Whittaker-Bermite site. In explaining the recent detection of perchlorate at Well 201, Appendix I states:

“Analysis of the planned program for restoration of originally impacted wells using the basin groundwater model estimated that perchlorate-contaminated groundwater would be contained and captured by pumping Saugus 1 and 2. Ultimately, however, the combination of litigation, settlement, permitting and construction constrained actual implementation of the containment program until 2010, six years after the impact of the

⁹³ See *Feasibility Study*, p. ES-2; *Action Plan*, p. ES-2.

⁹⁴ *Action Plan*, p. ES-2.

⁹⁵ 2010 UWMP, p. 5-4.

containment program on perchlorate migration in groundwater was analyzed. That time, combined with the preceding seven years since perchlorate first impacted water supply wells, resulted in a greater risk of downgradient migration of perchlorate in the Saugus Formation, and is interpreted to be the primary reason for the recent detection of perchlorate in VWC Well 201. However, as mentioned above, that possibility was addressed in the Settlement Agreement as it includes provisions for providing treatment to wells that are impacted by perchlorate not contained or captured by the original containment program.”

In summary, the detection of perchlorate at Well 201 is not evidence that the “pump and treat” technology is failing to contain perchlorate. Rather, various factors delineated in Appendix I of the 2010 UWMP indicate that the delayed implementation of the Saugus 1 and 2 program is the reason for the downgradient migration to Well 201.

In addition, as noted, Well 201 was taken out of service in August 2010, and has not been returned to municipal supply service since that time. It also is not relied upon as a municipal supply source in the recently adopted 2010 UWMP. Instead, Valencia Water Company’s plan is to remediate the well by either permanently taking it out of service and replacing it with a new well in a non-perchlorate impacted portion of the groundwater basin, or adding wellhead treatment to the well, so that the water can be treated to “non-detect” levels. However, before either remediation option takes place, Valencia Water Company has committed to working with CLWA and the regulatory agencies (e.g., DPH) before implementation of either remediation option. This includes an ongoing effort by the Valencia Water Company and CLWA to update the existing groundwater modeling to assist in addressing questions from the regulatory agencies.⁹⁶

The County also is aware of comments stating that perchlorate contamination and the lack of “clean up” facilities has precluded the water purveyors from providing the amount of groundwater required to meet the needs of existing and future Santa Clarita Valley residents. As indicated above, however, the Mission Village Draft EIR reported that an adequate supply of existing and planned water exists to meet the needs of Santa Clarita Valley residents now and in the future, despite the loss in capacity due to the perchlorate-impacted wells. This is achieved through an available and varied water supply portfolio. As indicated above, two of the originally impacted Saugus wells (Saugus 1 and 2) were placed back in service in January 2011, restoring approximately 3,544 acre-feet (af) of water supply in a normal year.⁹⁷ The contaminated Stadium Well and VWC Well 157 have been replaced and the pumping capacity lost due to that contamination has been restored with two new replacement wells in non-impacted portions of the

⁹⁶ Pers. Comm. Keith Abercrombie, General Manager, Valencia Water Company, September 30, 2011.

⁹⁷ 2010 UWMP, Table 3-9.

basin. Based on this information, the conclusions reached in the Mission Village Draft EIR that groundwater from existing and replacement wells will be available to assist in meeting the current and projected water demands in the Santa Clarita Valley is reasonable and supported by evidence.

With respect to the litigation brought in 2000 by CLWA and other local retail purveyors against prior and current owners of the former Whittaker-Bermite facility in order to recover clean-up costs for perchlorate-impacted wells in the basin, the Mission Village Draft EIR provides the following summary of the litigation as well as the Settlement Agreement reached in that action:

“In November, 2000 Castaic Lake Water Agency (CLWA), NCWD, SCWD, and VWC (collectively, “Plaintiffs”) filed a complaint against past owner Whittaker and current owners SCLLC and Remediation Financial, Inc., (RFI)(Whittaker, SCLLC and RFI are collectively referred to as “Defendants”) in the California Central District Court asserting that hazardous substances (including perchlorate) released from the Whittaker Bermite site contaminated some of Plaintiffs’ water production wells. In July 2002, Plaintiffs moved the Court for partial summary judgment that Defendants were liable for response costs under the Comprehensive Environmental Response, Compensation, and Recovery Act (CERCLA). At the same time, Whittaker moved the Court to establish Plaintiffs’ liability under CERCLA. In July 2003, the Court granted (in part) Plaintiffs’ motion and found that Whittaker and SCLLC were liable for CERCLA response costs and denied Whittaker’s motion. *Castaic Lake Water Agency v. Whittaker Corporation*, 272 F.Supp.2d 1053 (2003).

In September 2003, the parties entered into an interim settlement agreement that stayed litigation to allow the parties to, inter alia, develop an engineering solution to contain and abate the groundwater contamination and negotiate a final settlement agreement. As a condition for staying litigation activities, Defendants were required to reimburse CLWA for past monitoring and investigation costs and fund the development of the engineering solution. While the parties developed a groundwater abatement/containment plan, they were unable to reach a final settlement agreement. The interim settlement agreement expired on January 31, 2005.

In July 2004, Defendants SCLLC and RFI, the current owners of the Whittaker property filed a petition for chapter 11 bankruptcy protection and were subject to the automatic stay of litigation. The SCLLC and RFI bankruptcy filing complicated settlement negotiations because any proposed settlement offer that involved SCLLC and RFI insurance proceeds -- a substantial and important source of settlement funds -- required bankruptcy court approval.

The stay of litigation lapsed on January 31, 2005 without a final settlement and on March 23, 2005, the Court ordered the parties to mediate the matter before the Honorable Eugene Lynch (ret.). On April 19, 2005, Plaintiffs and Defendants reached an agreement in principle on damages that was subject to Defendants reaching a settlement funding agreement with their insurance carriers. During the April 2005 mediation, VWC informed Defendants of the perchlorate contamination found in VWC’s groundwater well Q2. Whittaker agreed to provide \$500,000 for the installation of a well head

treatment unit. All capital as well as operating and maintenance costs for this treatment unit were funded by insurance companies representing the current and past owners of the property. Utilizing these funds, VWC installed a perchlorate removal system utilizing ion exchange technology. After only six months from the initial detection of perchlorate in the well, Q2 was returned to active service on October 12, 2005. Subsequently in October 2007, the California Department of Public Health approved a request by VWC to remove the treatment system as a result of two years of continuous operation without a detection of perchlorate in the untreated groundwater produced by Q2. Currently, Q2 remains in operation without any requirement for well head treatment.

In July 2005, the parties reported that settlement negotiations between Plaintiffs and Defendants had not progressed because Defendants and their insurance carriers had not reached an agreement on funding the settlement. The Court ordered the parties to resume litigation activities on August 16, 2005. In November 2005, Defendants and their insurance carriers reached an agreement on the allocation of environmental insurance proceeds for the site and funding of a potential settlement with the Plaintiffs and submitted the proposed settlement agreement to the bankruptcy court for approval. The Bankruptcy court approved the settlement agreement involving the insurance proceeds and in January 2006, Defendants provided Plaintiffs with a draft plan to utilize the insurance proceeds to settle Plaintiffs' groundwater contamination claims.⁹⁸

As explained above, the litigation to contain and remove perchlorate from the Santa Clarita Valley's groundwater aquifers has been settled, and the water purveyors estimate the settlement provides up to \$100 million to address the perchlorate issue.

2010 UWMP and 2010 Water Report

Since circulation of the Mission Village Draft EIR in October 2010, the 2010 UWMP (June 2011) and 2010 Water Report (June 2011) have been completed. Both documents, which are presented in their entirety in the Final EIR (October 2011), **Appendix F4.8(A)**, include information updating both current and projected groundwater conditions in the Santa Clarita Valley. The final 2010 UWMP (June 2011) addresses perchlorate from both a capacity and treatment standpoint, and evaluates the recent detection of perchlorate at Well 201 to the satisfaction of the Santa Clarita Valley water agencies/suppliers.

Specific to perchlorate, the 2010 UWMP provides the following summary of events to date:

"[C]ertain wells in the Basin were impacted by perchlorate contamination and thus represented a temporary loss of well capacity within CLWA's service area. Six wells were ultimately taken out of service upon the detection of perchlorate, including four Saugus wells and two Alluvial wells. All have either been (1) abandoned and replaced, (2) returned to service with the addition of treatment facilities that allow the wells to be used

⁹⁸ 2010 UWMP, pp. 4.8-49 through 4.8-51.

for municipal water supply as part of the overall water supply systems permitted by [DPH] or (3) will be replaced under an existing perchlorate litigation settlement agreement (See Section 5). The restored wells (two Saugus wells and one Alluvial well) and the replacement wells (one Saugus and one Alluvial well), which collectively restore much of the temporarily lost well capacity, are now included as parts of the active municipal groundwater source capacities delineated in Tables 3-8 and 3-9. An additional two wells will be drilled to fully restore 4,200 gpm [gallons per minute] (6,776 AFY) of the impacted well capacity, thus restoring the operational flexibility that existed prior to the perchlorate being discovered. The cost of drilling the remaining two wells will be fully reimbursed under the terms of the perchlorate litigation settlement agreement....

Most recently, in August 2010, VWC's Well 201, located downgradient from the Whittaker-Bermite site and downgradient from the initially impacted Saugus 1, Saugus 2, and V157 wells, had detectable concentrations of perchlorate and the well was taken out of service. Water sampling tests from August 2010 through April 2011 also confirmed the presence of perchlorate over the adopted regulatory standard. This well was immediately taken out of service in August 2010 and its capacity is not included in active groundwater sources delineated in Table 3-9. VWC plans to actively seek remediation under the settlement agreement and restore the impacted well capacity in the near term."⁹⁹

The perchlorate detected in Valencia Water Company's Well 201 was examined in detail in both the 2010 UWMP and the 2010 Water Report. Based on the analysis conducted for the 2010 UWMP, temporarily taking Well 201 out of service, while remediation is permitted, will have no significant impact on the Valley's water supplies, which are sufficient to meet the current and projected water demands in the Santa Clarita Valley, even after taking into account the impacted well. As stated in the 2010 UWMP:

"Perchlorate has been a water quality concern in the Valley since 1997 when it was originally detected in four wells operated by the purveyors in the eastern part of the Saugus Formation, near the former Whittaker-Bermite facility. Subsequent monitoring well installation has been completed; and a focused study of the Saugus Formation has ultimately been incorporated into the overall groundwater remediation and perchlorate containment. All remedial action has been reviewed by the DTSC.

Overall, the plans developed for groundwater operation will allow CLWA and the retail purveyors to meet near term and long term demand within the CLWA service area. Any well impacted by perchlorate will be removed from service in the near term and the loss of capacity will be met by near-term excess capacity in non-impacted wells or through the installation of replacement well(s), if necessary, until remediation alternatives, including wellhead treatment, and DPH approval is obtained for restoration of the impacted supply. The current removal of VWC Well 201 from service does not limit the reliability of the water supply since there is sufficient excess capacity in Saugus wells to meet water supply projections during the period required for its restoration. Therefore, no

⁹⁹ 2010 UWMP, p. 3-34.

anticipated change in reliability or supply due to water quality is anticipated based on the present data, as is shown in Table 5-2.”¹⁰⁰

Both the 2010 UWMP and 2010 Water Report conclude that groundwater utilization in the Valley is sustainable, and will continue to be sustainable, in accordance with the groundwater operating plan. Specific to the 2010 UWMP, that document concludes that groundwater pumping remains within the groundwater operating plan, which has been analyzed for sustainability:

“Overall, the total municipal supply in this Plan includes a groundwater component that is, in turn, part of the overall groundwater supply of the Valley. As such, the municipal groundwater supply, distributed among the retail purveyors, recognizes the existing and projected future uses of groundwater by overlying interests in the Valley such that the combination of municipal and all other groundwater pumping remains within the groundwater operating plan (Table 3-5) that has been analyzed for sustainability.”¹⁰¹

For additional related information, please see Final EIR (October 2011), **Topical Response 7: Urban Water Management Plan**, and **Topical Response 8: 2010 Santa Clarita Valley Water Report**. Please also see the 2010 Water Report, Section 3.1 Groundwater Basin Yield; Section 3.2 Alluvium – General; Section 3.3 Saugus Formation – General; and Section 4 Summary of 2010 Water Supply and 2011 Outlook. See also 2010 UWMP, Section 3.3 Groundwater, and Appendix I.

In summary, work continues on multiple levels to address groundwater contaminated by perchlorate stemming from past manufacturing activities on the former Whittaker-Bermite site. CLWA and the local retail purveyors are proceeding to restore the production capacity of the remaining groundwater supply wells contaminated by perchlorate, while working on the objectives of containing the downgradient migration of perchlorate.

Based on the information presented in the Mission Village Draft EIR, and the updated information provided in this response, it is appropriate to conclude that substantial progress continues to be made in responding to perchlorate contamination resulting from the former Whittaker-Bermite site and that the facilities needed for perchlorate remediation/treatment are in place and actively monitored by CLWA, local retail purveyors, and the regulatory agencies (e.g., DPH).

¹⁰⁰ 2010 UWMP, pp. 5-12 and 5-13.

¹⁰¹ 2010 UWMP, pp. 3-35 and 3-36.