



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE
Chief Engineer and General Manager

NOTICE OF PREPARATION

To: California Office of Planning and Research, Responsible Agencies, Trustee Agencies, and Other Interested Parties

Subject: Notice of Preparation of Recirculated Santa Clarita Valley Sanitation District Chloride Compliance Project Environmental Impact Report – Separation of Recycled Water Project

Project Title: Recirculated Santa Clarita Valley Sanitation District Chloride Compliance Project Environmental Impact Report – Separation of Recycled Water Project

Lead Agency: Santa Clarita Valley Sanitation District of Los Angeles County
1955 Workman Mill Road, Whittier, CA, 90601

Date: February 17, 2017

Public Review Period: February 17, 2017 through March 20, 2017

The Santa Clarita Valley Sanitation District (SCVSD), acting as Lead Agency, will prepare a Recirculated Santa Clarita Valley Sanitation District Chloride Compliance Project Environmental Impact Report-Separation of Recycled Water Project (Recirculated EIR) for its Chloride Compliance Facilities Plan. This Recirculated EIR will revise some of the analysis from SCVSD's prior Final EIR, which was certified by the SCVSD Board of Directors on October 28, 2013. The purpose of this Recirculated EIR is to allow SCVSD to evaluate the potential approval of the Chloride Compliance Facilities Plan, while separating that Plan from the previously evaluated Recycled Water Project.

To meet the State-mandated limit for chlorides, the SCVSD must construct facilities for removal of chloride from the wastewater coming to the SCVSD's water reclamation plants ("Chloride Compliance Project"). That Final EIR analyzed the environmental impacts associated with the construction of facilities and also analyzed impacts associated with an increased use of the treated recycled water as opposed to continued full discharge into the Santa Clara River ("Recycled Water Project"). The Recirculated Draft EIR will update and supplement the prior analysis of the Chloride Compliance Project, which the SCVSD must implement to meet mandates of the California Regional Water Quality Control Board-Los Angeles Region (Regional Water Board). The Recirculated Draft EIR will not analyze impacts of the Recycled Water Project, which is a separate project that is not dependent on the Chloride Compliance Project. The SCVSD intends to analyze the Recycled Water Project in a separate CEQA document. The Recirculated Draft EIR will include analysis demonstrating the Chloride Compliance Project and Recycled Water Project are independent, and will analyze the impacts, if any, resulting from separate implementation of the projects. A comprehensive description of the Chloride Compliance Project, including approval history is attached.

If you are a Responsible or Trustee Agency, the SCVSD is soliciting written comments as to new or changed impacts and mitigation measures that may be relevant to your agency's statutory responsibilities in connection with the separation of the Chloride Compliance Project from the Recycled Water Project.

Your agency will need to use the EIR prepared by SCVSD when considering any permit or other approval for the Chloride Compliance Project. Please provide the name and telephone number of a contact person in your agency with your response.

If you are a resident, property owner, or interested party, the SCVSD is requesting your written comments concerning what you believe should be considered for the revised analysis in the Recirculated Draft EIR or any environmental effects that separating the Chloride Compliance Project and the Recycled Water Project may have on your property or your community. Please share this Notice of Preparation with anyone else you feel may have an interest in this project. An electronic version of this Notice of Preparation can be found at http://www.lacsd.org/residents/documents_for_public_review.asp.

The SCVSD is holding a 30-day review period in compliance with the California Environmental Quality Act. Please submit your written comments to the undersigned at the address shown above no later than 4:00 p.m. on March 20, 2017. In addition to written comments, two Scoping Meetings will be held to receive comments. The Scoping Meetings will be held on March 7, 2017, at 3:00 p.m. and 7:00 p.m. at the City of Santa Clarita Activities Center located at 20880 Centre Pointe Parkway, Santa Clarita, California, 91350. For further information about the project, please contact Ms. Jodie Lanza at (562) 908-4288, extension 2707, or via email at jlanza@lacsd.org.

Date:

2/17/17



Jodie Lanza, P.E.
Supervising Engineer
Planning Section

1.0 Introduction

The County Sanitation Districts of Los Angeles County (Sanitation Districts) are a confederation of 24 independent sanitation districts, including the Santa Clarita Valley Sanitation District (SCVSD), that serve the wastewater and solid waste management needs of approximately 5.6 million people in Los Angeles County. These services include the collection and treatment of wastewater (water from sinks, toilets, showers, laundry, etc.) The Sanitation Districts' service area covers approximately 850 square miles and encompasses 78 cities and unincorporated territory within Los Angeles County. Additional information is available on our website at www.lacsd.org.

The SCVSD provides wastewater management services for approximately 268,000 residents in the City of Santa Clarita and adjacent unincorporated areas. The SCVSD collects wastewater from households and businesses within its service area and treats the wastewater at its Saugus Water Reclamation Plant (Saugus WRP) and Valencia Water Reclamation Plant (Valencia WRP). The Saugus and Valencia WRPs have a combined treatment capacity of 28.1 million gallons per day (mgd) and currently treat approximately 18 mgd. The treated water is of high quality and suitable for a wide range of uses such as irrigation of street medians, golf courses, parks, and schools. Some treated wastewater is reused and the remainder is discharged to the Santa Clara River (River).

2.0 Upper Santa Clara River Chloride Total Maximum Daily Load

Under the Federal Clean Water Act and the State's Porter Cologne Act, the Regional Water Board, a State agency, is responsible for regulating discharges to the River to protect beneficial uses of the River's water. In fulfilling this responsibility, the Regional Water Board adopted a regulatory order called the Upper Santa Clara River Chloride Total Maximum Daily Load (Chloride TMDL) in 2002 that imposes a strict limit of 100 milligrams per liter (mg/l) on the level of chloride (salt) in the treated wastewater discharged by the SCVSD's two wastewater treatment plants.

Chloride is naturally present in the drinking water supplied to Santa Clarita homes and businesses. When wastewater leaves homes and businesses in the sewer system, the chloride level is higher due to additions from regular human activities. Chloride is also added during wastewater treatment, mainly during disinfection. These additions cause chloride levels in the treated wastewater to exceed the 100 mg/L limit.

Chloride has been significantly reduced by improved source control, largely through the community's removal of over 8,000 automatic water softeners. Additional efforts to remove the relatively small number of remaining water softeners have continued. These reduced chloride levels provide a major benefit by reducing the size and cost of additional treatment facilities needed to comply with the chloride limit. Although chloride in the WRP discharges has been reduced, chloride removal facilities are necessary to comply with the 100 mg/L chloride limit.

The SCVSD spent more than ten years attempting to achieve the most reasonable chloride limit possible and seeking the least costly solution to meeting the State-mandated chloride limit. The SCVSD's two wastewater treatment plants are not designed to remove chloride. To meet the State-mandated limit and avoid regulatory penalties including State fines, additional treatment equipment must be designed, constructed and fully operational by the State's strict deadline of July 2019. The SCVSD Chloride Compliance Facilities Plan and Environmental Impact Report (2013 Facilities Plan and EIR) documents the technical studies completed to identify the most cost-effective and environmentally responsible methods of meeting the State-mandated chloride limit.

3.0 California Environmental Quality Act Document History

In October 2013, after nearly two years of extensive public input, meetings, hearings, and environmental review, the SCVSD Board of Directors (SCVSD Board) approved a project to comply with the State-mandated chloride limit (Chloride Compliance Project) and certified that the associated 2013 Facilities Plan and EIR complied with the California Environmental Quality Act (CEQA).

The Chloride Compliance Project includes new reverse osmosis equipment at the Valencia WRP. The water that has passes through a reverse osmosis membrane becomes ultra-clean water and the remaining salty water becomes a byproduct called brine that requires proper disposal. Brine was originally to be managed by deep well injection (DWI). Based on public input regarding DWI, the SCVSD Board withdrew the DWI proposal and directed staff to investigate alternative deep well sites and additional brine management alternatives. In 2015, the SCVSD proposed to modify the approach to brine management by replacing DWI with the installation of enhanced brine concentration equipment at the Valencia WRP and disposal of the smaller amount of concentrated brine by limited trucking to an existing industrial facility, the Sanitation Districts' Joint Water Pollution Control Point in Carson. A Supplemental Environmental Impact Report for Brine Concentration and Limited Trucking (Trucking SEIR) was prepared to describe the environmental impacts from this brine management approach. On March 23, 2016, the SCVSD Board certified the Final Trucking SEIR and approved the change in the method of brine management.

Most of the chloride compliance solutions investigated in the 2013 Facilities Plan and EIR included the production of brine. Because this brine cannot be discharged to the River, the Chloride Compliance Project would minimally reduce discharge of treated (recycled) water from at least one of SCVSD's WRPs to the River. As analyzed in the Trucking SEIR the reduction in discharge related to brine management would be a maximum of 52,000 gallons per day or 0.4 percent of the discharged flow. Unrelated to the chloride compliance solutions, the SCVSD has considered the potential impacts of further reducing the discharge of treated water from the WRPs to the River, under the Recycled Water Project, to permit the direction of recycled water to community reuse such as landscape irrigation. Even though the Chloride Compliance Project and the Recycled Water Project are independent efforts (i.e., implementation of one does not require or necessitate implementation of the other), both projects were addressed in the 2013 Facilities Plan and EIR. The 2013 Facilities Plan and EIR described the Recycled Water Project as "Support for Municipal Reuse of Recycled Water: and contained an analysis of the potential environmental impacts to biological resources (including an endangered fish known as the unarmored threespine stickleback, or UTS) that could occur due to a proposed one-third reduction in discharge. The technical analysis that supported the EIR concluded that no significant impact would occur.

Following the certification of the 2013 Facilities Plan and EIR, the Affordable Clean Water Alliance ("ACWA") filed a petition for writ to set aside the District's certification on the grounds that the documents failed to comply with CEQA in a number of respects. While the Trucking SEIR was being finalized, the Los Angeles County Superior Court ruled in February 2016 that the EIR for the 2013 Facilities Plan failed to comply with CEQA in two particulars. First, the Court determined that additional environmental study was necessary with respect to the impact of reduced discharge to the River resulting from the Recycled Water Project on the UTS. Secondly, the Court considered SCVSD's pursuit of an alternate method of brine management to be an "abandonment" of deep well injection, which left the SCVSD with an incomplete chloride compliance project because it had no approved method of brine management. The Court did not find fault with the environmental review related to the Chloride Compliance Project, but nonetheless set aside the 2013 Facilities Plan and EIR and related approvals until SCVSD complied with CEQA with respect to the two issues identified by the Court.

On March 23, 2016, the SCVSD Board recertified the 2013 Facilities Plan and EIR without the Recycled

Water Project to address the Court's first issue. SCVSD also certified the Trucking SEIR, approved a new brine management approach, and created a Modified Chloride Compliance Project to address the Court's second issue. As noted in the Trucking SEIR, the modified project would result in no more than a 0.4 percent reduction in discharge to the River. Such a reduction would have a negligible impact on biological resources, including UTS.

Following the February ruling, SCVSD returned to the Court in April 2016 seeking approval to proceed with the Chloride Compliance Project while deferring implementation of the Recycled Water Project until further UTS study could be completed. On June 2, 2016, the Court determined that SCVSD could not do so because it had not studied the potential impacts of implementing the Chloride Compliance Project separate from the Recycled Water Project, delaying the work to comply with the State chloride mandates.

On August 4, 2016, SCVSD issued a Notice of Preparation of a Supplemental Environmental Impact Report for Study of Impacts to the Unarmored Threespine Stickleback Fish Under Reduced Discharge Conditions from the Santa Clarita Valley Sanitation District's Water Reclamation Plants (Stickleback SEIR). The intent of Stickleback SEIR is to maintain support of both the Chloride Compliance Project and the Recycled Water Project under one CEQA document record. Since August, SCVSD and California Department of Fish and Wildlife have been working together to determine the appropriate criteria for analyzing impacts to UTS. Based on the progress of these discussions and the projected work remaining to complete the study, to minimize fines to ratepayers, SCVSD has decided to pursue the Recycled Water Project separately from the Chloride Compliance Project and recirculate the EIR.

4.0 Need for Recirculated Chloride Compliance Project Draft Environmental Impact Report – Separation of Recycled Water Project

In response to the most recent Court ruling with regard to the Chloride Compliance Project, SCVSD is preparing a Recirculated Draft EIR for the Chloride Compliance Project, which is the subject of this Notice of Preparation. This document updates and supplements the 2013 Facilities Plan and EIR to include brine concentration and limited trucking as the brine disposal option and to separate the Recycled Water Project.

SCVSD intends to continue study of UTS habitat suitability for preparation of a future CEQA document for the Recycled Water Project.

5.0 Santa Clarita Valley Sanitation District Chloride Compliance Facilities Plan and EIR

5.1 Updated Project Objectives

The goal of this Recirculated Draft EIR is to meet the following project objectives in a cost-effective and environmentally sound manner:

- Provide compliance with the Chloride TMDL for SCVSD wastewater treatment and discharge facilities in the timeliest manner.
- Demonstrate the independent utility and implementation of the Chloride Compliance Project and the Recycled Water Project.

5.2 Recommended Project Description

The Chloride Compliance Project that has been proposed based on the analysis contained in the 2013

Facilities Plan and EIR, and the Trucking SEIR includes UV disinfection at the Saugus and Valencia WRPs, and advanced water treatment (for chloride compliance and brine concentration) at the Valencia WRP, with brine disposal by limited trucking of to the Joint Water Pollution Control Plant in Carson, California. Each project component described would be located within Los Angeles County and the locations of project components are shown in Figures 1 and 2.

6.0 Potential Environmental Effects

CEQA requires analysis and consideration of a project's environmental impacts. The Recirculated Draft EIR will focus on the evaluation of the potential direct, indirect, and cumulative impacts associated with implementation of separating the Recycled Water Project from the Chloride Compliance Project. The following sections summarize potential effects of the separation. The remaining environmental issue areas will not change as a result of the Recirculated Draft EIR and, as a result, will not be re-evaluated within the Recirculated Draft EIR.

6.1 Air Quality and Greenhouse Gas Emissions

Construction of the Chloride Compliance Project would generate emissions from construction equipment exhaust, earth movement, transportation of the construction workers to and from the site, and material hauling. These emissions could adversely affect regional air quality. Trucking of the brine during the operational phase would generate emissions from truck exhaust. The 2013 Facilities Plan and EIR, and Trucking SEIR assessed the potential impacts of the Chloride Compliance Project with brine disposal by limited trucking to the Joint Water Pollution Control Plant in Carson on air quality and greenhouse gas emissions and for potentially significant impacts, identified feasible mitigation measures to reduce the environmental impacts. No new impacts to air quality or greenhouse gas emissions are introduced by this Recirculated Draft EIR. Additionally, the separation of the Chloride Compliance and Recycled Water Projects introduces no new impacts. However, there is a new method of analysis that is the industry standard. While this new method of analysis is not expected to result in new impacts, results from the analysis will be presented.

6.2 Biological Resources

Construction of the Chloride Compliance Project would occur in areas that could support special-status plant or animal species. The disposal of brine produced by the advanced water treatment facility would reduce discharge by 0.4 percent to the Santa Clara River, which supports special-status species. The 2013 Facilities Plan and EIR, and Trucking SEIR assessed the potential impacts of the Chloride Compliance Project with brine disposal by limited trucking of to the Joint Water Pollution Control Plant in Carson on these potential impacts. Since this Recirculated Draft EIR presents the Chloride Compliance Project separate from the Recycled Water Project, the potential impacts of biological resources will be limited to on-site construction, facility operation and maintenance, and a 52,000-gallon per day reduction in discharge flow. Separation of the Chloride Compliance and Recycled Water Projects essentially maintains current discharge flows and, thus, will reduce impacts.

6.3 Hydrology and Water Quality

Construction of the Chloride Compliance Project would occur primarily on the existing Valencia WRP property, which is near portions of the Santa Clara River. The 2013 Facilities Plan and EIR assessed the potential impacts of the Chloride Compliance Project on hydrology and water quality. The Chloride Compliance Project will provide a higher level of treatment to wastewater before discharge to the river to meet the State-mandated chloride limit. Therefore, the project will have a beneficial impact upon water quality. The Recirculated Draft EIR considers the Chloride Compliance Project separately from the Recycled Water Project. Hydrological impacts of the Recycled Water Project are mostly associated with

a reduction in discharge to the River. Separation of the Chloride Compliance and Recycled Water Projects essentially maintains current discharge flows and, thus, will reduce impacts.

7.0 Separation of Chloride Compliance Project and Recycled Water Project

The purpose of the Chloride Compliance Project is to provide further treatment to the wastewater received at the Valencia WRP to reduce the chloride concentration to meet the State-mandated Chloride TMDL for waters discharged to the River. The 2013 Facilities Plan and EIR analyzed a wide variety of alternatives to meet the Chloride TMDL. These alternatives were reduced down to four best alternatives that were to be further analyzed for environmental impacts to determine a recommended project. After identifying the four best alternatives for a Chloride Compliance Project, “Support of Municipal Recycled Water Reuse” (the Recycled Water Project) was stated to be added onto each of these alternatives. Implementation of the Chloride Compliance Project and the Recycled Water Project meet independent project objectives.

The Valencia WRP currently treats wastewater to a tertiary-treated level suitable for reuse for irrigation and other purposes. Upgrading the facility to Advanced Water Treatment serves the sole purpose of removing chloride to meet the State-mandated water quality objectives for the River. Meeting this regulatory requirement neither encourages nor discourages the development of the Recycled Water Project. Similarly, the Recycled Water Project will not require Advanced Water Treatment, as tertiary treated wastewater meets recycled water reuse requirements. The Recirculated Draft EIR will analyze the Chloride Compliance Project separate from the Recycled Water Project and will analyze the impacts, if any, resulting from separate implementation of the projects.