



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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## PUBLIC NOTICE OF AVAILABILITY

### SANTA CLARITA VALLEY SANITATION DISTRICT DRAFT RECIRCULATED SANTA CLARITA VALLEY SANITATION DISTRICT CHLORIDE COMPLIANCE PROJECT ENVIRONMENTAL IMPACT REPORT – SEPARATION OF RECYCLED WATER PROJECT (DRAFT)

**To:** Mailing List

**Lead Agency:** Santa Clarita Valley Sanitation District of Los Angeles County

**State Clearinghouse Number:** 2012011010

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

**Project Location** County of Los Angeles

### Summary

The Santa Clarita Valley Sanitation District (SCVSD) has prepared a Draft Recirculated Santa Clarita Valley Sanitation District Chloride Compliance Project Environmental Impact Report – Separation of Recycled Water Project (Draft Recirculated EIR) for its Chloride Compliance Project. This Draft Recirculated EIR will revise some of the analysis from SCVSD’s prior 2013 Chloride Compliance Facilities Plan and Environmental Impact Report (2013 EIR), which was certified by the SCVSD Board of Directors on October 28, 2013. The Chloride Compliance Project was modified by the SCVSD Supplemental Environmental Impact Report for Brine Concentration and Limited Trucking in March 2016 (2016 Trucking SEIR). The purpose of this Draft Recirculated EIR is to allow SCVSD to evaluate the potential approval of the Chloride Compliance Project alone, while separating that project from the Recycled Water Project, which was also analyzed in the 2013 EIR.

### Background

The Santa Clarita Valley Sanitation District of Los Angeles County provides wastewater management services for approximately 250,000 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 (SWRP) and Valencia Water Reclamation Plant (VWRP), which have a combined treatment capacity of 28 million gallons per day (mgd) and currently treat approximately 20 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 (SCR).

This Draft Recirculated EIR, as discussed below, updates prior analysis of impacts of a plan to comply with a State-mandated chloride limit (Chloride Compliance Project) and includes multiple components:

- The Chloride Compliance Project was studied previously in an EIR certified by SCVSD in 2013 (2013 EIR). The 2013 EIR was decertified pursuant to an order by the Los Angeles County Superior Court (Court), but the analysis contained in the 2013 EIR was, for the most part, upheld by the Court. This Draft Recirculated EIR updates the analysis contained in the 2013 EIR and 2016 Trucking SEIR, where necessary, to address new information or changed circumstances, including the SCVSD's subsequent decision to abandon plans to dispose of brine through deep well injection and also to pursue separately plans for the eventual reuse of the treated water (Recycled Water Project). For certain resource areas, no revisions to the prior analysis are required. For other resource areas, only limited revisions are required.
- At the time the SCVSD Board of Directors (Board) considers approval and certification of the Draft Recirculated EIR, the Board will also consider decertifying the 2016 Trucking SEIR, as the Draft Recirculated EIR would become the operative California Environmental Quality Act (CEQA) document for the Chloride Compliance Project, including the plan for brine management.

Because the 2013 EIR and 2016 Trucking SEIR are revised and recirculated only in part, SCVSD is requesting that reviewers limit comments to the new analysis provided in Sections 1 through 10 of this Draft Recirculated EIR. The responses to comments already prepared for the 2013 EIR and 2016 Trucking SEIR during the initial circulation period are included in Sections 11 and 12 as part of the full text of those EIRs. During preparation of the Final Recirculated EIR for the Chloride Compliance Project, SCVSD will include responses to comments received during the recirculation period related to Sections 1 through 10 of this Draft Recirculated EIR, consistent with the provisions of CEQA Guidelines Section 15088.5. SCVSD will only consider new comments by reviewers that are submitted on the new content of the Draft Recirculated EIR, as the comment periods on the 2013 EIR and 2016 Trucking SEIR have expired.

## **Purpose and Need**

Under the Federal Clean Water Act and the State's Porter Cologne Act, the Regional Water Quality Control Board—Los Angeles Region (Regional Board), a State agency, is responsible for regulating discharges to the SCR to protect beneficial uses of the SCR's water. In fulfilling this responsibility, the Regional 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 have caused chloride levels in the treated wastewater to exceed the 100 mg/L limit.

The Chloride Compliance Project includes new reverse osmosis equipment at the VWRP. The wastewater that passes through a reverse osmosis membrane becomes ultra-clean water, and the remaining salty water becomes a byproduct called brine that requires proper disposal. Under the 2013 EIR, brine was originally to be managed by deep well injection. Based on public input, in 2016 the SCVSD Board approved a modified method for brine management by replacing deep well injection with the installation of enhanced brine concentration equipment at the VWRP and disposal of the smaller amount of concentrated brine by limited trucking to an existing industrial facility, the County Sanitation Districts of Los Angeles County (Sanitation Districts') Joint Water Pollution Control Plant in Carson.

Unrelated to the chloride compliance solutions, the SCVSD also considered a plan to further reduce the discharge of treated water from the water reclamation plants to the SCR. The 2013 EIR described this activity as "Support for Municipal Reuse of Recycled Water" (Recycled Water Project) and analyzed the potential environmental impacts to biological resources (including an endangered fish known as the unarmored three-spine stickleback, or UTS) that could occur from a proposed approximate one-third reduction in discharge associated with that project. The technical analysis that supported the 2013 EIR concluded that no significant impact would occur. The Recycled Water Project would permit the direction of treated wastewater (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 EIR. The Recycled Water Project is optional, and the Chloride Compliance Project is a mandated project to improve water quality in the SCR.

Following the certification of the 2013 EIR, the Affordable Clean Water Alliance ("ACWA") filed a petition for writ to set aside the SCVSD's certification of the 2013 EIR on the grounds that the document failed to comply with CEQA. The Los Angeles County Superior Court (Court) ruled in February, 2016 that the 2013 EIR failed to comply with CEQA in two respects, one of which was that the Court determined additional environmental study was necessary with respect to the impact of reduced discharge to the SCR resulting from the Recycled Water Project upon UTS habitat.

On March 23, 2016, the SCVSD Board recertified the 2013 EIR and approved the Chloride Compliance Project without the Recycled Water Project to address the Court's issue regarding the UTS. In doing so, the SCVSD Board resolved that the Recycled Water Project would be studied separately, in its own environmental documentation. SCVSD returned to the Court in April 2016 by filing a return to the Court's writ and seeking to discharge the writ and 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 without analyzing the potential impacts of implementing the Chloride Compliance Project separate from the Recycled Water Project. The Court also held that SCVSD could not proceed with the Chloride Compliance Project pending compliance with the writ, thereby delaying SCVSD's work to comply with the State chloride mandates.

The SCVSD is preparing this Draft Recirculated EIR to update and supplement the prior analysis of the Chloride Compliance Project, where applicable, and to analyze potential impacts, if any, from proceeding with the Chloride Compliance Project separately from the Recycled Water Project. Together, the analyses contained in the 2013 EIR and 2016 Trucking SEIR, reproduced in this Draft Recirculated EIR, combined with any updated information and analyses regarding impacts of pursuing the Chloride Compliance Project separately from the Recycled Water Project, constitute a complete review of the impacts of the Chloride Compliance Project. This Draft Recirculated EIR retains the Chloride Compliance Project components in the 2013 EIR and the 2016 Trucking SEIR with which the Court did not find fault.

Separate environmental review and analysis of the Chloride Compliance Project and Recycled Water Project is appropriate because the chloride compliance action and brine actions are functionally independent and have independent utility. Under CEQA, a proposal that is related to a project, but has its own “independent utility” and is not necessary for the project to proceed need not be included as part of the project description, and may be reviewed in its own CEQA document, as a separate project. *Planning & Conservation League v. Castaic Lake Water Agency* (2009) 180 Cal.App.4th 210, 237. Accordingly, two projects may undergo separate environmental review when the projects serve different purposes or can be implemented independently. *Banning Ranch v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1223(citing *Communities for a Better Env’t v. City of Richmond* (2010) 184 Cal.App.4th 70, 99; *Sierra Club v. West Side Irrigation Dist.* (2005) 128 Cal.App.4th 690, 699; *Plan for Arcadia v. City Council of Arcadia* (1974) 42 Cal.App.3d 712, 724.

The SCVSD has prepared this Draft Recirculated EIR to identify the potential effects on the local and regional environment associated with separating the Recycled Water Project from the Chloride Compliance Project that was analyzed in the 2013 EIR and 2016 Trucking SEIR. The Chloride Compliance Project has not changed since the 2013 EIR was certified, other than the plan for brine management analyzed in the 2016 Trucking SEIR. This Draft Recirculated EIR includes the prior 2013 analysis and the prior 2016 Trucking SEIR. This Draft Recirculated EIR also analyzes whether revisions to the prior analyses are needed to address new information or changed circumstances that would increase impacts of the Chloride Compliance Project (including any impacts resulting from separating the Chloride Compliance Project from the Recycled Water Project).

This Draft Recirculated EIR identifies the mitigation measures necessary to reduce any impacts to a less-than-significant level. The impact analyses are based on a variety of sources, including analysis contained in the 2013 EIR, the analysis contained in the 2016 Trucking SEIR, agency consultation, technical studies, and field surveys. The SCVSD will use this Draft Recirculated EIR in considering whether to approve the proposed Chloride Compliance Project.

## **Project Description**

The Chloride Compliance Project is unchanged from the projects analyzed in the 2013 EIR, reproduced at Section 11 of the Draft Recirculated EIR, and the 2016 Trucking SEIR, reproduced at Section 12 of the Draft Recirculated EIR, except that the SCVSD plans to proceed with the Chloride Compliance Project separately from the Recycled Water Project. This project continues

to propose UV disinfection at the SWRP and VWRP, advanced water treatment (for chloride compliance and brine concentration) at the VWRP, and brine disposal by limited trucking to the Joint Water Pollution Control Plant in Carson, California, which is owned and operated by another of the Sanitation Districts. Each project component described would be located within Los Angeles County, and the locations of these project components are shown in **Figures ES-1 through ES-3**.

### **Potential Significant Environmental Impacts**

Separation of the Recycled Water Project from the Chloride Compliance Project would generally reduce impacts on environmental resource areas analyzed in the 2013 EIR and 2016 Trucking SEIR, as there would be no significant changes to current operations. Resource areas that needed updating to discuss potential impacts from the separation of the Chloride Compliance Project from the Recycled Water Project included: air quality, biological resources, hydrology and water quality, cumulative impacts, alternatives, growth inducement, and water resources. Analysis of these resource areas did not result in any new or substantively-modified mitigation measures relative to the 2013 EIR and 2016 Trucking SEIR. All resource areas would sustain no impact or a less than significant impact.

### **Public Review and Public Hearings**

Pursuant to Section 21092 of the Public Resources Code, the Draft Recirculated EIR will be available for public review beginning on May 3, 2017, and ending on June 19, 2017. As part of the review process, this Notice of Availability is being sent to responsible, trustee, and interested agencies as well as interested individuals. Written comments on the Draft Recirculated EIR should be sent to the following individual:

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The Draft Recirculated EIR is available for review online at [www.lacsds.org](http://www.lacsds.org). Hard copies of the Draft Recirculated EIR are also available for public review at the following locations:

Sanitation Districts of Los Angeles County  
Public Counter  
1955 Workman Mill Road  
Whittier, CA 90601

City of Santa Clarita  
City Hall, Public Counter  
23920 Valencia Blvd #120  
Santa Clarita, CA 91355

Valencia Library  
23743 West Valencia Blvd.  
Santa Clarita, CA 91355

Stevenson Ranch Express Library  
26233 West Faulkner Drive  
Stevenson Ranch, CA 91381

Two public hearings will be held at the dates and locations noted below. There will be a 30 minute open house prior to the formal hearing where staff will be available to answer questions

and discuss the project. The hearing itself will be an opportunity to provide verbal comments on the Draft Recirculated EIR for the administrative record.

Date: May 25, 2017

Time: 1:00 PM (open house from 12:30-1:00 PM)

Location: Santa Clarita Activities Center  
20880 Centre Pointe Parkway  
Santa Clarita, CA 91350

Date: May 25, 2017

Time: 7:00 PM (open house from 6:30-7:00 PM)

Location: Santa Clarita Activities Center  
20880 Centre Pointe Parkway  
Santa Clarita, CA 91350