

ADDENDUM TO THE
SUBSTITUTE ENVIRONMENTAL DOCUMENT FOR THE
UPPER SANTA CLARA RIVER VALLEY EAST SUBBASIN
SALT AND NUTRIENT MANAGEMENT PLAN

INTRODUCTION/PROJECT MODIFICATION DESCRIPTION

In accordance with the State Water Resources Control Board's (SWRCB's) Recycled Water Policy (Policy), the Upper Santa Clara River Integrated Regional Water Management Planning Group of stakeholders, including the Castaic Lake Water Agency (CLWA), City of Santa Clarita, CLWA Santa Clarita Water Division (SCWD), Santa Clarita Valley Sanitation District (SCVSD), Newhall County Water District (NCWD), Valencia Water Company (VWC), and other interested community members worked collaboratively to prepare a Salt and Nutrient Management Plan (SNMP) for the Santa Clara River Valley East Groundwater East Subbasin (East Subbasin). The Basin can also be referred to as the Upper Santa Clara River (USCR) Basin.

The purpose of the SNMP is to determine the current (ambient) water quality conditions in the East Subbasin and ensure that all water management practices, including the use of recycled water, are consistent with water quality objectives. The SNMP is intended to provide the framework for water management practices to ensure protection of beneficial uses, and allow for the sustainability of groundwater resources consistent with the Basin Plan.

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the lead agency for evaluating the environmental impacts of the SNMP. Any water quality control plan, state policy for water quality control, and any other components of California's water quality management plan as defined in Code of Federal Regulations, title 40, sections 130.2(k) and 130.6, proposed for board approval or adoption must include or be accompanied by Substitute Environmental Documentation (SED) and supported by substantial evidence in the administrative record. The SED prepared for the SNMP analyzed environmental impacts that may occur from implementing groundwater quality management measures identified in the SNMP, and is a variation of the California Environmental Quality Act (CEQA) evaluation.

The SED is based on the proposed SNMP for the East Subbasin that will be considered by the Regional Board and, if approved by the Regional Board, will be incorporated into the California Water Quality Control Plan, Los Angeles Region (Basin Plan) consistent with Water Code Section 13242. The SED is scheduled to be considered by the Regional Board when the Regional Board considers adoption of the groundwater quality management measures in the SNMP as a Basin Plan Amendment on November 10, 2016. Approval of the SED is separate from approval of a specific project alternative or a component of an alternative. The approval process for the SED includes (1) addressing public comments received during the 45-day comment period that ends on October 13, 2016, (2) confirming that the Regional Board considered the information in the SED, and (3) affirming that the SED reflects independent judgment and analysis by the Regional Board (CEQA Guidelines Section 15090 (Title 14 of CCR), Division 6, Chapter 3).

The use of recycled water is a key component in the long-term water supply management in the Santa Clarita Valley. For the SNMP, the impact of recycled water on the water quality of the groundwater basin was investigated for treated effluent

discharged to the Santa Clara River and recycled water applied to the land surface for landscape irrigation. In particular, the SED analyzed the concentration of chloride in recycled water supplied by the two water reclamation plants in the Valley (the Valencia Water Reclamation Plant and the Saugus Water Reclamation Plant) at 125 milligrams per liter (mg/l). A sensitivity analysis was subsequently prepared for the SNMP which modeled chloride levels at a higher level meant to represent increases in chloride in the water supply due to historic drought conditions of water treatment plant discharges at 156 mg/l. The sensitivity analysis evaluated changes in groundwater chloride concentrations in Santa Clara River Management Zones 3 and 4 adjacent to the reclamation plants, to assess the potential impacts on assimilative capacity. This additional higher chloride scenario, is being added to the SED per this addendum to provide more information about the project.

This addendum demonstrates that the environmental analysis, impacts, and mitigation measures identified in the CEQA SED remain substantively unchanged as a result of the additional modeling scenario considered and described in this document. Thus, the proposed modified project (modifications to the project identified in the SED with the addition of the new scenario) does not result in any new significant impacts or a substantial increase in the severity of any impacts previously identified in the CEQA SED. The reader is referred to Sections 5 and 6 of the SED for the evaluation of environmental impacts, cumulative impacts, unavoidable significant environmental effects, and significant irreversible environmental changes.

REGULATORY BACKGROUND

The Recycled Water Policy requires that SNMPs comply with CEQA. CEQA requires state and local agencies to determine the potential significant environmental impacts of proposed projects and identify measures to avoid or mitigate those impacts where feasible. The basic purposes of CEQA are to 1) inform decision makers and the public about the potential significant environmental effects of a proposed project, 2) identify ways that environmental damage may be avoided or mitigated, 3) prevent significant, avoidable damage to the environment by requiring changes in projects through the selection of feasible project alternatives or mitigation measures, and 4) disclose to the public why an agency approved a project if significant effects are involved (California Code of Regulations (CCR), title 14, § 15002(a)).

Under CEQA, an addendum to a CEQA document, including an SED, is appropriate if minor technical changes or modifications to the project occur (CEQA Guidelines Section 15164), where the changes or modifications do not result in any new significant impacts or a substantial increase in the severity of previously identified significant impacts. The addendum need not be recirculated for public review (CEQA Guidelines Section 15164[c] and 15088.5) where 'new information' added to the document is not "significant" and that the new information added merely clarifies or amplifies or makes insignificant modifications to the document. However, the Regional Board must consider the addendum with the Final CEQA document prior to making a decision on the project modifications (CEQA Guidelines Section 15164[d]).

EVALUATION OF MODIFICATION

The initial predictive model runs in the SNMP assume that recycled water discharged to the Santa Clara River will be treated by reverse osmosis and will have a maximum

average chloride concentration of 100 mg/L, while recycled water used for landscape irrigation may have a higher chloride concentration of approximately 125 mg/l (the sum of the State Water Project median chloride concentration [70 mg/l] and the average chloride increment since 2010 [55 mg/l]). Thus the SNMP modeled and SED analyzed the concentration of chloride in recycled water supplied by the two water reclamation plants in the Valley (the Valencia Water Reclamation Plant and the Saugus Water Reclamation Plant) at 125 mg/l.

Subsequent to this initial modeling, the SCVSD recommended additional predictive modeling be performed to evaluate the impact of higher chloride concentrations seen in imported water since 2011 as a result of historical dry conditions. As such, a sensitivity analysis was subsequently prepared for the SNMP which modeled chloride levels in recycled water used for landscape irrigation at 156 mg/l (the average chloride concentration in Valencia plant effluent for the period 2001-2011) and assessed the resulting impact on the basin's assimilative capacity. This was done to reflect the level of chloride that might occur in recycled water supplied by the two WRPs under severe drought conditions.

Table 1 below compares the changes in assimilative capacity between the initial model and the sensitivity run as a result of recycled water use proposed in the CLWA Recycled Water Master Plan. The concentrations shown in columns [1] and [2] are the resulting average concentrations for the initial model and sensitivity run respectively for Management Zone 3 (South Fork subunit) and Management Zone 4 (Santa Clara – Bouquet and San Fancisquito Canyon subunit); the zones adjacent to the reclamation plants. The assimilative capacity for the initial run and sensitivity run are reported in columns [3] and [4] respectively. Column [5] reports the change in assimilative capacity between the initial run and the sensitivity run for Management Zone 3 and Management Zone 4. As shown, a higher chloride concentration will result in a decline of assimilative capacity from 17.2 mg/l to 15.9 mg/l in Management Zone 3, while in Management Zone 4 results in a decline from 5.2 mg/l to 4.7 mg/l. In other words, the results of the sensitivity analysis indicate only nominal losses in chloride assimilative capacity of 0.5 and 1.3 mg/l in the affected water management zones. This is measured against a chloride Basin Objective of 100 mg/l in both cases and does not change the required compliance with the chloride TMDL for the Santa Clara River. Therefore, the sensitivity analysis indicates that the decline in assimilative capacity is less-than-significant at the higher chloride concentration used in the sensitivity analysis.

Appendix J in the SNMP provides a summary of the anticipated water quality changes for the sensitivity analysis and how anticipated water quality changes were implemented in the spreadsheet model.

Table 1. Summary of Sensitivity Analysis

Management Zone	Average Chloride Concentrations, mg/L		Assimilative Capacity, mg/L		Decrease in Assimilative Capacity, mg/L
	[1]	[2]	[3]	[4]	[5]
	Current Model	Sensitivity Run	Current Model	Sensitivity Run	
Management Zone 3	82.8	84.1	17.2	15.9	1.3
Management Zone 4	94.8	95.3	5.2	4.7	0.5

CONCLUSION

The addition of this scenario results in no change in the purpose, need, or objectives of the project.

The implementation of the proposed Basin Plan Amendment with this project modification will continue to result in improved groundwater quality in the Santa Clara River Valley East Subbasin and will have significant positive impacts to the environment (including the preservation of groundwater beneficial uses) and the economy over the long term. Additionally, the program level CEQA analysis still concludes that when the Program is implemented in combination with non-SNMP projects in the region, there would be less than significant cumulative impacts on the environment. The reader is referred Section 7 of the SED for the final determination and findings; which remain unchanged as a result of this project modification.

This addendum demonstrates that the environmental analysis, impacts, and mitigation measures identified in the CEQA SED remain substantively unchanged as a result of the project modifications considered and described in this document. Thus, the proposed modified project (modifications to the project identified in the SED) does not result in any new significant impacts or a substantial increase in the severity of any impacts previously identified in the CEQA SED. The reader is referred to Sections 5 and 6 of the SED for the evaluation of environmental impacts, cumulative impacts, unavoidable significant environmental effects, and significant irreversible environmental changes.