

6.0 REVISED DRAFT ADDITIONAL ANALYSIS PAGES

This section of the Final Additional Analysis presents pages of the Draft Additional Analysis that have been revised. Changes are presented in underline/strikeout format, with additions being underlined and deletions being ~~stricken~~. A line is provided along the page margin indicating where a change has been made. None of the revisions made change the conclusions of the water supply analysis. An adequate supply of water is available for the proposed project and no significant impacts will occur.

3. EXISTING CONDITIONS

Water supply and demand in the Santa Clarita Valley is affected by existing conditions, including local climatic conditions, demographics in the region, existing topography and regional area geology and hydrology, surface water flows, effects of drought cycles both locally and regionally, and effects of urbanization in the valley. These existing conditions are more thoroughly addressed in the following documents:

- (a) Water Supply Contract Between the State of California Department of Water Resources and CLWA, 1963 (plus amendments, including the "Monterey Amendment," 1995, and Amendment No. 18, 1999, the transfer of 41,000 acre-feet from Kern County Water Agency to CLWA)² (**Appendix 3.0-1**);
- (b) Water Management Program, Valencia Water Company, 2001 (**Appendix 3.0-2**);
- (c) 2002 Semitropic Groundwater Storage Program and Point of Delivery Agreement Among the Department of Water Resources of the State of California, CLWA and Kern County Water Agency (**Appendix 3.0-3**);³
- (d) 2002 Recycled Water Master Plan prepared by Kennedy/Jenks Consultants for CLWA (**Appendix 3.0-4**);
- (e) 2001 Update Report, Hydrogeologic Conditions in the Alluvial and Saugus Formation Aquifer Systems, July 2002 (*2002 Slade Report*) (**Appendix 3.0-5**);
- (g) California's Groundwater Bulletin 118, Santa Clara River Groundwater Basin, Santa Clara River Valley East Subbasin (*2003 Update*) (**Appendix 3.0-6**);
- (h) CLWA Capital Improvement Program, prepared by Kennedy/Jenks Consultants, 2003 (**Appendix 3.0-7**);
- (j) Groundwater Management Plan, Santa Clara River Valley Groundwater Basin, East Subbasin, prepared by Luhdorff & Scalmanini Consulting Engineers, December 2003 (**Appendix 3.0-8**);

² CLWA's contract rights to SWP water total 95,200 afy, including a water transfer of 41,000 afy approved in 1999 from Wheeler Ridge-Maricopa Water Storage District, a member unit of the Kern County Water Agency. CLWA's EIR prepared in connection with the 41,000 afy water transfer was challenged in *Friends of the Santa Clara River v. Castaic Lake Water Agency* (Los Angeles Superior Court, Case No. PC018110). On appeal, the Court of Appeal, Second District, held that since the 41,000 afy EIR tiered off the Monterey Agreement EIR that was later decertified, CLWA would also have to decertify its EIR as well and prepare a new EIR (*Friends v. Castaic Lake Water Agency* (2002) 95 Cal. App 4th 1373). CLWA has not been enjoined from using any water that is part of the 41,000-afy transfer. CLWA has since prepared and circulated a new draft EIR for the transfer. The public comment period ended for the draft EIR and two separate hearings were held by CLWA to receive and consider public comments. CLWA approved and certified the new EIR on December 22, 2004. Two challenges to the new EIR were filed on January 24, 2005, in the Ventura County Superior Court (*Planning and Conservation League v. CLWA and California Water Impact Network v. CLWA*). These challenges are pending. The new certified EIR must be presumed to be adequate unless affected by a future judgment or order of the court.

³ Due to availability of SWP water during 2002, CLWA entered into a groundwater banking agreement in 2002. Pursuant to that agreement, 24,000 acre-feet of SWP water, contracted by CLWA, was stored within the Semitropic Groundwater Storage Program in Kern County so that CLWA may withdraw the water in future years of shortage. The Negative Declaration prepared by CLWA was challenged in *California Water Network v. Castaic Lake Water Agency* (Ventura County Superior Court Case No. CIV 215327). The trial court upheld the adequacy of the Negative Declaration. That case is presently on appeal in the trial court decision was subsequently appealed and the Second District Court of Appeal, Sixth Division, Case No. B177978, affirmed the trial court decision in April 2006 and upheld the adequacy of the Negative Declaration.

A. Castaic Lake Water Agency

CLWA was formed in 1962 through passage of the “Castaic Lake Water Agency Law.”⁴ At that time, CLWA’s purpose was contracting with the California DWR to provide a supplemental supply of imported water from the SWP to the water purveyors in the Santa Clarita Valley. Since 1962, CLWA’s purpose has been broadened to include: (a) acquisition of water and water rights, including but not limited to from the State of California; (b) distribution of such water wholesale through a transmission system to be acquired or constructed by CLWA; (c) reclamation (recycling) of water; (d) selling of water at retail within certain boundaries; and (e) exercise of other related powers.

CLWA’s service area in Los Angeles and Ventura counties extends to most of the incorporated cities within the geographic boundaries of Los Angeles County, and to a small portion of eastern Ventura County. **Figure 3.0-1** depicts CLWA’s service area. As the public agency water wholesaler, CLWA provides about half of the potable water used by Santa Clarita Valley households and businesses. CLWA operates two potable water treatment plants, storage facilities and over 17 miles of transmission pipelines. CLWA supplies water from the SWP operated by DWR. This water supplements local groundwater supplies from the Santa Clara River Valley groundwater basin (east subbasin), and it is treated and delivered to the four local retail purveyors in Santa Clarita Valley. CLWA also delivers recycled water from one of two existing water reclamation plants in the Santa Clarita Valley owned and operated by the Sanitation Districts of Los Angeles County. The recycled water is used to meet a portion of the non-potable water demand (golf courses, landscape irrigation, etc.) in the valley.

CLWA is one of 29 SWP contractors with long-term water supply contracts with DWR.⁵ CLWA’s current water supply contract with DWR is for an annual contractual Table A Amount of 95,200 af. Table A Amount (formerly referred to as “entitlement”) is named for the Table A in each SWP contractor’s water supply contract. It contains an annual buildup in Table A Amounts of SWP water, from the first year of the water supply contract through a specific year, based on growth projections made before the water supply contract was executed. For most SWP contractors, the maximum annual Table A Amount was reached in 1990. The total of all SWP contractors’ maximum Table A Amounts is currently about 4.17 million af.

⁴ See, California Water Code Appendix, Section 103-1, 103-15.

⁵ The water supply contract, as amended, between CLWA and DWR is found in **Appendix 3.0-1** of this EIR.

**Table 3.0-5
Active Municipal Groundwater Source Capacity – Alluvial Aquifer Wells**

Wells	Pump Capacity (gpm)	Max Annual Capacity (af)	Normal-Year Production ⁽¹⁾ (af)	Dry-Year Production (af)
NCWD				
Castaic 1	600	960	385	345
Castaic 2	425	680	166	125
Castaic 4	270	430	100	45
Pinetree 1	300	480	164	N/A
Pinetree 3	550	880	545	525
Pinetree 4	500	800	300	N/A
NCWD Subtotal	2,645	4,230	16,606	1,660
SCWD				
Clark	600	960	782	700
Guida	1,000	1,610	1,320	1,230
Honby	950	1,530	696	870
Lost Canyon 2	850	1,370	741	640
Lost Canyon 2A	825	1,330	1,034	590
Mitchell 5B	700	1,120	557	N/A
N. Oaks Central	1,000	1,610	822	1,640
N. Oaks East	950	1,530	1,234	485
N. Oaks West	1,400	2,250	898	N/A
Sand Canyon	750	1,200	930	195
Sierra	1,500	2,410	846	N/A
SCWD Subtotal	10,525	16,920	9,860	6,350
Valencia Water Co.				
Well D	1,050	1,690	690	690
Well E-15	1,400	2,260	N/A	N/A
Well N	1,250	2,010	620	620
Well N7	2,500	4,030	1,160	1,160
Well N8	2,500	4,030	1,160	1,160
Well Q2	1,200	1,930	985	985
Well S6	2,000	3,220	865	865
Well S7	2,000	3,220	865	865
Well S8	2,000	3,220	865	865
Well T2	800	1,290	460	460
Well T4	700	1,120	460	460
Well U4	1,000	1,610	935	935
Well U6	1,250	2,010	825	825
Well W9	800	1,290	600	600
Well W10	1,500	2,410	865	865
Well W11	1,000	1,610	350	350
Valencia Subtotal	22,950	36,950	11,705	11,705
Total Purveyors	36,120	58,100⁽²⁾	23,225⁽²⁾	19,095⁽²⁾

Notes:

⁽¹⁾ Based on recent annual pumping.

⁽²⁾ Currently active wells only; capacity will slightly increase by restoration of perchlorate-contaminated wells.

Source: Valencia Water Company.

(c) Impacted Alluvial and Saugus Wells

A small group of wells that have been impacted by perchlorate represent a temporary loss of well capacity within the CLWA service area. Of the six wells that were initially removed from active water supply service upon the detection of perchlorate, four wells with a combined flow rate of 7,200 gpm remain out of service, as discussed further in Chapter 5 of the 2005 UWMP (**Appendix 3.0-14**). However, CLWA and the purveyors have developed an implementation plan that would restore this well capacity. The implementation plan includes a combination of treatment facilities and replacement wells.

Construction of treatment facilities for several of the impacted wells will commence in 2006 and will be operational in 2007, and the production restoration (replacement) wells will be operational by 2010. Additional information on the treatment technology and schedule for restoration of the impacted wells is provided in Chapter 5 of the 2005 UWMP. Additional information concerning water quality issues and replacement capacity is also provided in Chapter 5 of the 2005 UWMP.

B. Water Quality in the Alluvial Aquifer and Saugus Formation

(1) Overview

The groundwater quality of the Alluvial aquifer and the Saugus Formation consistently meets drinking water standards set by the U.S. Environmental Protection Agency (U.S. EPA) and the California Department of Health Services (DHS). The water is delivered by the local retail purveyors in the CLWA service area for domestic use without treatment, although the water is disinfected by the retail purveyors prior to delivery. An annual Consumer Confidence Report is provided to all Santa Clarita Valley residents who receive water from the local retail water purveyors in the CLWA service area. In that report, there is detailed information about the results of the testing of groundwater quality and treated SWP water supplied to the residents of the Santa Clarita Valley. Water quality regulations are constantly changing as contaminants that are typically not found in drinking water are discovered and new standards are adopted. In addition, existing water quality standards are becoming more stringent in terms of allowable levels in drinking water.

(2) Groundwater Quality – Alluvium

Groundwater quality is a key factor in assessing the Alluvial aquifer as a municipal and agricultural water supply. In terms of the aquifer system, there is no convenient long-term record of water quality, (i.e., water quality data in one or more single wells that spans several decades and continues to the present). Thus, in order to examine a long-term record of water quality in the Alluvium, individual records have been integrated from several wells completed in the same aquifer materials and in close

water supplies as projected to be available in the 2005 UWMP and other analyses, reports, and documents on which this water analysis relies. The following section summarizes the litigation, its status, and explains why the City concurs with, and is entitled to rely on, the water supply conclusions reached by the expert water agencies, CLWA and NCWD, about the reliability of water supplies.

(a) Litigation Concerning California Environmental Quality Act (CEQA) Review of the Monterey Agreement

In *Planning and Conservation League v. Department of Water Resources*, 83 Cal.App. 4th 892 (2000), the Court of Appeal, Third Appellate District, decertified an EIR prepared by the Central Coast Water Agency (CCWA) to address the “Monterey Agreement,” a statement of principles to be incorporated into an omnibus revision of the long-term contracts between the DWR and ~~local~~-water contractors governing the supply of water under the SWP. CLWA wishes to complete the characterization of the negotiation and execution of the Monterey Agreement and subsequent contract amendments. The Monterey Agreement was the culmination of negotiations between DWR and ~~six-most of the 29 SWP contractors~~ ~~local-water contractors~~ to settle disputes arising out of the allocation of water during times of shortage. Twenty-seven of the 29 SWP contractors executed the Monterey Amendments to their water supply contracts in 1996. The Monterey Agreement contemplated revisions in the methodology of allocating water among contractors and provided a mechanism for the permanent transfer of Table A water amounts from one contractor to another. The Monterey Agreement was implemented by the execution of legally binding contracts between DWR and the two largest water contractors: Kern County Water Agency (KCWA) and Metropolitan Water District of Southern California (The Monterey Amendments). Although the court set aside the EIR prepared by CCWA, it did not set aside, invalidate, or otherwise vacate the Monterey Agreement or the Monterey Amendments. No court has ordered any stay or suspension of the Monterey Agreement pending certification of a new EIR and the DWR and contracting water agencies continue to abide by the Monterey Agreements, as implemented by the Amendments, as the operating framework for the SWP.

Following decertification of the original Monterey Agreement EIR, the PCL litigants entered into the Monterey Settlement Agreement in 2003, designating DWR as the lead agency for the preparation of an EIR to address the Monterey Agreement. DWR is currently in the process of preparing that EIR. The Monterey Settlement Agreement also declared that certain water transfers between contracting agencies were “final.” A 41,000-afy Kern-Castaic transfer (discussed further below) was not among those “final” transfers but rather was recognized to still be subject to dispute, due to then-pending litigation in Los Angeles Superior Court challenging the EIR prepared for that transfer. (*Friends of the Santa Clarita River v. Castaic Lake Water Agency*, see discussion below.) DWR’s EIR will analyze the potential environmental effects relating to the Monterey transfers, including a focused analysis of the 41,000-afy transfer, which will be provided as part of a broader analysis of past and future permanent transfers of Table A Amounts.

(b) Litigation Concerning CEQA Review of the 41,000-afy Transfer

Of CLWA's 95,200 af annual Table A Amount, 41,000 afy was permanently transferred to CLWA in a contract approved by DWR in 1999 by Wheeler Ridge-Maricopa Water Storage District, a member unit of the Kern County Water Agency. CLWA prepared an EIR in connection with the 41,000 afy water transfer, which was challenged in *Friends of the Santa Clara River v. Castaic Lake Water Agency* (Los Angeles County Superior Court, Case No. BS056954) ("*Friends*"). The original trial court decision was completely in favor of CLWA. On appeal, the Court of Appeal, Second Appellate District, held that since CLWA's original 41,000 afy EIR tiered from the Monterey Agreement EIR that was later decertified (see supra, *Planning and Conservation League v. Dept. of Water Resources* [2000] 83 Cal. App. 4th 892, above), CLWA would also have to decertify its EIR as well and prepare a revised EIR. The court refused, however, to enjoin CLWA from using any part of the 41,000-afy transfer pending preparation of a new EIR. As discussed further below, *Friends* was dismissed with prejudice (permanently) in February 2005. Its original EIR for the 41,000-afy transfer having been decertified, CLWA prepared and circulated a revised Draft EIR for the 41,000-afy transfer, received and responded to public comments regarding the revised Draft EIR, and held two separate public hearings concerning the revised Draft EIR. CLWA approved the revised EIR for the 41,000-afy transfer on December 22, 2004, and lodged the certified EIR with the Los Angeles Superior Court as part of its return to the trial court's writ of mandate in *Friends*. Thereafter, as noted above, *Friends* was dismissed with prejudice (permanently). In January 2005, two separate and new legal challenges to CLWA's revised EIR for the 41,000-afy transfer were filed in the Ventura County Superior Court by the Planning and Conservation League and by the California Water Impact Network. These cases have been consolidated and transferred to Los Angeles County Superior Court and are still pending.

The new pending challenges to the adequacy of CLWA's revised EIR for the 41,000-afy transfer, and DWR's pending preparation of a new Monterey Agreement EIR, arguably introduce an element of potential uncertainty regarding the 41,000-afy transfer, although based on a review of all the surrounding circumstances, these events do not significantly affect the reliability of the transfer amount, and, therefore, it is still appropriate for the City of Santa Clarita to conclude that CLWA and NCWD properly included the transfer amount as part of CLWA's 95,200 afy Table A Amount, for several reasons. First, the 41,000-afy transfer was completed in 1999 in a DWR/CLWA water supply contract amendment approved by DWR. Since 2000, DWR has allocated and annually delivered the water in accordance with the completed transfer.²³ In connection with that transfer, CLWA paid approximately \$47 million for the additional 41,000 afy Table A supply, the monies have been accepted by ~~Kern-Castaic~~ the Wheeler Ridge-Maricopa Water Storage District, a member unit of the Kern County Water Agency, the sale price has been financed through the sale of CLWA tax-exempt bonds, and, as noted, DWR has expressly approved and amended CLWA's long-term water supply contract to reflect the increase in CLWA's SWP Table A

²³ This contract was never legally challenged and, therefore, is considered permanent and in full force and effect.

allege that the purchase is not allowed until all litigation against the Monterey Agreement is complete. Given that this topic was the subject of the Superior Court order issued in the Gate-King case, this transfer is extensively addressed elsewhere in this environmental document. A summary of the reasons the City believes the transfer to be considered for planning purposes is presented (again) below.

The new pending challenges to the adequacy of CLWA's revised EIR for the 41,000-afy transfer, and DWR's pending preparation of a new Monterey Agreement EIR, arguably introduce an element of potential uncertainty regarding the 41,000-afy transfer, although based on a review of all the surrounding circumstances, these events do not significantly affect the reliability of the transfer amount, and, therefore, it is still appropriate for the City of Santa Clarita to conclude that CLWA and NCWD properly included the transfer amount as part of CLWA's 95,200 afy Table A Amount, for several reasons. First, the 41,000-afy transfer was completed in 1999 in a DWR/CLWA water supply contract amendment approved by DWR. Since 2000, DWR has allocated and annually delivered the water in accordance with the completed transfer.²⁷ In connection with that transfer, CLWA paid approximately \$47 million for the additional 41,000 afy Table A supply, the monies have been accepted by the Wheeler Ridge-Maricopa Water Storage District, a member unit of the Kern County Water Agency~~Kern-Castaie~~, the sale price has been financed through the sale of CLWA tax-exempt bonds, and, as noted, DWR has expressly approved and amended CLWA's long-term water supply contract to reflect the increase in CLWA's SWP Table A Amount and the permanent transfer/reallocation of SWP Table A supply between SWP contractors. This contract has never been set aside but continues in full force and effect. Second, the Court of Appeal held that the only defect in the 1999 EIR was that it tiered from the Monterey Agreement EIR, which was later decertified. This defect has now been remedied by CLWA's preparation and certification of a revised EIR that did not tier from the Monterey Agreement EIR. This new EIR must be deemed to be legally adequate until and unless it is set aside by a court. Third, the Monterey Settlement Agreement expressly authorized the operation of the SWP in accordance with the Monterey Amendments. The Monterey Amendments, which are still in effect and have not been set aside by any court, authorized SWP contractors to transfer unneeded SWP supply amounts to other contractors on a permanent basis. Specifically, the Monterey Agreement provisions authorized 130,000 af of agricultural SWP contractors' entitlements to be available for sale to urban SWP contractors. CLWA's 41,000-af acquisition was a part of the 130,000 af of SWP Table A supply that was transferred, consistent with the Monterey Amendments. Although DWR is still in the process of preparing the EIR to address the Monterey Agreement, the court in the PCL litigation refused to set aside the Monterey Agreement pending preparation of that EIR. Fourth, the Court of Appeal in *Friends* refused to enjoin the 41,000-afy transfer, and instead required preparation of a revised EIR, which EIR CLWA has now completed and certified. Fifth, CLWA's amended water supply contract documenting the 41,000-afy transfer remains in full force and effect, and no court has ever questioned the validity of the contract or enjoined the use of this portion of CLWA's

²⁷ This contract was never legally challenged and, therefore, is considered permanent and in full force and effect.

Table A Amount. For all these reasons, the City is entitled to rely on CLWA's and NCWD's determination that it is reasonable to include the 41,000-afy transfer in its calculation of available water supplies. With respect to the new Monterey Agreement EIR, CLWA has concluded that its use of the 41,000 afy is not legally bound to the Monterey Agreement litigation or to DWR's new EIR for the Monterey Agreement and may occur independently of that Agreement. That DWR did not oppose CLWA's completion and certification of the new EIR for the water transfer, independent of DWR's new Monterey Agreement EIR, supports this view. Thus, the pending legal challenges to the revised EIR and DWR's preparation of a new Monterey Agreement EIR are not expected to impact the amount of water available to CLWA as a result of the completed 41,000-afy transfer.

It should also be noted that in separate litigation relating to the West Creek project that was approved by the County of Los Angeles in 2005, on January 6, 2006, the Santa Barbara County Superior Court issued a decision indicating that the EIR prepared for the West Creek project contained substantial evidence in the record to support the decision to rely upon the 41,000-afy transfer for planning purposes. The court reasoned that even if there is some risk to the availability of the 41,000 afy arising out of DWR's yet unfinished preparation of a new EIR for the Monterey Agreement, an adverse final judgment in the Monterey litigation is not likely, in the long term, to adversely affect the transfer as (a) such litigation is unlikely to "unwind" completed and executed water transfers such as the 41,000 afy year transfer; (b) existing SWP water supply contract provisions allow such transfers without the need for the Monterey Agreement; and (c) existing law allows CLWA to enter into contracts outside the context of the Monterey Agreements. A complete copy of the West Creek decision is provided **Appendix 3.0-3** of this Additional Analysis.

(10) Semitropic Groundwater Bank

The Petitioners allege that CLWA cannot use water stored in the Semitropic Groundwater Bank because of contamination. It is important to understand that CLWA entered into two storage projects at the Semitropic Groundwater Bank. The first project, in 2002, was ~~not~~ challenged. The second project, in 2004³, was not challenged. The second project is a 24,000-af storage project with a 10-year banking of water to firm up CLWA's water supply for existing uses, and was defined by CLWA as not providing water to accommodate new development. In *California Water Network and Friends of the Santa Clara River v. Castaic Lake Water Agency* ["Network"], Ventura Superior Court No. 215327, the Court refused to invalidate the water storage project and upheld CLWA's environmental review for the water banking project, including the analysis of water quality generally and the quality of the water being pumped back to CLWA through the SWP transmission facilities. In an unpublished decision dated March 23, 2006, the Court of Appeal (Second Appellate District) affirmed the Superior Court decision and rejected each of appellant's arguments, including arguments that (1) CLWA was not the proper lead agency to prepare the CEQA analysis for the Semitropic banking project; (2) that perchlorate contamination would be spread by the

precipitation and runoff patterns in California, future weather patterns are usually assumed to be similar to those in the past, especially where there is a long historical rainfall record.” (See page 6) [Emphasis Added]

“The month-to-month simulations are conducted over the 73-year period (1922–1994) of the adjusted historical rainfall/runoff data. This approach incorporates the over-arching assumption that the next 73 years will have the same rainfall/snowmelt amount and pattern, both within-year and from year to year, as the period 1922 through 1994. The studies do not incorporate any modifications to account for changes related to climate change or assess the risk of future seismic or flooding events significantly disrupting SWP deliveries. As tools are developed to address these risks and the resulting studies become available, the information will be incorporated into the assessment of SWP delivery reliability. The results of the CALSIM II studies conducted for this update to *The State Water Project Delivery Reliability Report 2002* (DWR 2003b) represent *the best available assessment* of the delivery capability of the SWP. (See page 9) [Emphasis Added]

As indicated by DWR, due to the uncertainty surrounding the topic of climate change, the DWR modeling completed to date is the “best available assessment of the delivery capability of the SWP.” Based on this opinion by the state’s expert on SWP modeling, the City believes it to be too speculative to conclusively analyze the effects of climate change on the reliability of the SWP at this time and, therefore, is terminating any further analysis of this topic.

(13) Water Conservation Measures

Petitioners allege that the 2005 UWMP relies on unsupported claims of water conservation. As indicated in the 2005 UWMP, a 10 percent reduction in water demand is expected to occur in all year types. ~~During a drought,~~ as conservation measures are employed by water purveyors, conservation levels would be in addition to the 10 percent baseline. As stated in the 2005 UWMP (page 2-11), “As a result of extraordinary conservation measures enacted during the [1987-1992 drought] period, the overall water requirements actually decreased by more than 10 percent.” Support for this assumption is found on UWMP Figure 2-4 presented on page 2-10, where it is shown that historic water consumption decreased in 1991 by approximately 10 percent despite the fact that 1991 was an average rather than a wet water year. In cool wet years, water consumption is expected to decrease 10 percent due to reduced demand without conservation measures.²⁹ Such a reduction is not expected in average years. The reduction in consumption in 1991 was a result of the “extraordinary conservation measures” enacted by CLWA and the water purveyors in the Santa Clarita Valley.³⁰ The *2004 Water Report*, prepared by CLWA and the water purveyors, states that a 10 percent water demand reduction is feasible during a drought based on past experience. When a shortage occurs, water consumers typically increase their awareness of water usage and voluntarily reduce water demands. During the 1987–1992 drought, voluntary

²⁹ 2005 UWMP, p. 2-9.

³⁰ Robert DiPrimio, President, Valencia Water Company, personal communication, March 24, 2006.

**Table 3.0-12
Recommended Schedule for Water Banking Capacity**

Year	Total Pumpback (afy)	Total Storage (afy)
2005	20,000	50,000
2010	20,000	50,000
2020	40,000	100,000
2030	60,000	150,000
2040	70,000	183,000
2050	70,000	183,000

Source: Draft Water Supply Reliability Plan, prepared by Kennedy/Jenks Consultants, 2003.

(a) Semitropic Water Banking

Semitropic Water Storage District (Semitropic) provides SWP water to farmers for irrigation. Semitropic is located in the San Joaquin Valley in the northern part of Kern County immediately east of the California Aqueduct. Using its available groundwater storage capacity (approximately one million af), Semitropic has developed a groundwater banking program, which it operates by taking available SWP supplies in wet years and returning the water in dry years. As part of this dry-year return, Semitropic can leave its SWP water in the Aqueduct for delivery to a banking partner and increase its groundwater production for its farmers. Semitropic constructed facilities so that groundwater can be pumped into a Semitropic canal and, through reverse pumping plants, be delivered to the California Aqueduct. Semitropic currently has six banking partners: the Metropolitan Water District of Southern California (Metropolitan), Santa Clara Valley Water District, Alameda County Water District, Alameda County Flood Control and Water Conservation District Zone 7, Vidler Water Company and The Newhall Land and Farming Company. The total amount of storage under contract is approximately 1 million af.

In 2002, CLWA stored an available portion of its Table A Amount (24,000 af) in an account in Semitropic's program.³³ In 2004, 32,522 af of available 2003 Table A Amount water was stored in a second Semitropic account.³⁴ In accordance with the terms of CLWA's storage agreements with Semitropic, 90 percent of the banked amount, or a total of 50,870 af, is recoverable through 2013 to meet CLWA water demands

³³ CLWA's approval of this project and of its negative declaration was challenged under CEQA in the Ventura County Superior Court (*California Water Network v. Castaic Lake Water Agency* [Ventura County Superior Court Case No. CIV 215327]). Finding that CLWA's approval of this project and of its negative declaration did not violate CEQA, the trial court entered judgment in favor of CLWA. The trial court decision was subsequently appealed and ~~However, Petitioners have filed an appeal with the California Court of Appeal, Second Appellate District, Division 6, Court of Appeal Case No. B177978, affirmed the trial court decision in April 2006 and upheld the adequacy of the Negative Declaration.~~ ~~The appeal is still pending as of this writing.~~

³⁴ No legal challenge was made to CLWA's approval of this project or to the negative declaration prepared under CEQA for this project.

remediation program could include 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.
- 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 current schedule for implementation of the plan to restore contaminated water supply (wells) is illustrated in **Figure 3.0-8**. Included in the schedule is a planned extended test of the wells that will be returned to service as part of restoring contaminated water supply and that will also be operated to extract contaminated water and control the migration of contamination in the aquifer.

Concurrent with the testing of the wells, several specific ion exchange resins also will be tested to evaluate their performance and longevity. 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 2007⁶. Notable recent accomplishments toward implementation include completion of the Final Interim Remedial Action Plan (RAP) in December 2005 and completion of environmental review with the adoption of a Mitigated Negative Declaration in September 2005.

In light of the preceding, with regard to the adequacy of groundwater as the local component of water supply for the Santa Clarita Valley, the impacted capacity will remain unavailable through 2006, during which time the non-impacted groundwater supply will be sufficient to meet near-term water

(2) DMS Build-Out Scenario

The DMS Build-Out Scenario entails existing development, buildout of the near-term subdivision projects listed in Los Angeles County's DMS, plus the project. The analysis of this cumulative development scenario is required by the City for the cumulative analysis of water service. The County's DMS lists all pending, recorded, and approved projects for which land divisions have been filed within County unincorporated lands and within the City of Santa Clarita. The City plus County unincorporated areas together constitute the County's Santa Clarita Valley Planning Area.

Table 3.0-18, Scenario 1: DMS Build-Out Scenario Demand and Supply for the Santa Clarita Valley, illustrates both the cumulative water demand (existing plus DMS) and supply for the Santa Clarita Valley. This cumulative water demand is compared to the near-term projected Santa Clarita Valley water supplies and the additional Newhall Ranch Specific Plan water supplies. As shown, there is an adequate supply of water expected in both average years and dry years, and no cumulative water supply impacts would occur. In fact, **Table 3.0-18** shows that water supplies exceed demand for the DMS development scenario by ~~31,747~~ ~~38,031~~ ~~to 39,631~~ af in average years and by ~~24,159~~ ~~to 24,609~~ ~~22,024~~ ~~to 22,474~~ af in dry years. However, it should be noted that dry-year supplies available above demand reflect water supplies that would be available to purveyors in dry years. Purveyors would typically secure water from these supplies only in amounts necessary to meet demand.

(3) Santa Clarita Valley Build-Out Scenario

The Santa Clarita Valley 2025 Build-Out Scenario entails buildout of lands under the current land-use designations indicated in the County's Areawide Plan and the City of Santa Clarita's General Plan by the year 2025, plus the proposed Gate-King project, plus all known active pending General Plan Amendment requests for additional urban development in the County unincorporated area and the City of Santa Clarita.

Table 3.0-18 (Revised, Replaces Previous Table 3.0-18)
Scenario 1: DMS Build-Out Scenario Demand and Supply for the Santa Clarita Valley

	Dry Years		
	Average Years	Multiple Dry	Single Dry
Santa Clarita Valley Demand			
- Existing Plus DMS Demand ⁽¹⁾	99,770	109,747	109,747
- Gate-King Demand	386	425	425
- Less Conservation		(11,017)	(11,017)
Total	100,156	99,154	99,154
Santa Clarita Valley Supply⁽²⁾			
- Local Supply			
a. Groundwater			
Alluvial aquifer	35,000	32,500	32,500
Less Newhall Ranch Agricultural Water	(3,402)	(4,534)	(4,534)
Saugus Formation	11,000	15,000	15,000
Restored Impacted Wells		6,500	10,000
Saugus Formation (new)			
b. Newhall Ranch Agricultural Water	3,402	4,534	4,534
c. Recycled Water	3,300	3,300	3,300
 Newhall Ranch WRP Supply	 2,103	 2,103	 2,103
- Imported Supplies			
a. SWP Table A Amount ⁽³⁾	69,500	31,400	3,800
b. Additional Planned Banking		5,000	20,000
c. Flexible Storage Account		1,510	6,060
d. Buena Vista-Rosedale Transfer	11,000	11,000	11,000
e. Rosedale-Rio Bravo Groundwater Bank		15,000	20,000
Total Supplies	131,903	123,313	123,763
Total Supplies above Demand⁽⁴⁾	31,747	24,159	24,609

Notes:

(1) Complete buildout of DMS land uses is estimated to occur in 2015.

(2) Source: 2005 UWMP, 2004 Water Report (May 2005).

(3) Dry-year supplies above demand reflect water supplies that would be available to purveyors in dry years. Purveyors would typically secure water from these available supplies only in amounts necessary to meet demand.

(4) The surplus shown above is the net water available for banking programs (e.g., Rosedale-Rio Bravo Groundwater Banking Project, other groundwater banking projects, etc.).

Table 3.0-19, Scenario 2: Santa Clarita Valley 2030 Build-Out Scenario Water Supplies, and Table 3.0-20, Scenario 2: Santa Clarita Valley 2030 Build-Out Scenario Water Demand and Supply, summarize the cumulative water demand and supply for this build-out scenario. As shown, the Gate-King project is not expected to create any significant cumulative water availability impacts in either average or dry years. In addition, under the buildout scenario, there are adequate water supplies for the project, with no significant cumulative water supply impacts occurring in either average or dry years. In fact, the two tables show that water supplies exceed demand under this scenario in average and dry years in 2030.

Table 3.0-20
Scenario 2: Santa Clarita Valley 2030 Build-Out Scenario Water Demand and Supply
(af)

	Buildout (year 2030)	
	Average Years	Dry Years
Santa Clarita Valley Water Supplies ^{a,d}	148,000	145,680-158,770
Total Build-Out Demand ^b	125,370	138,300
Total Surplus	22,630	7,380-20,470

^a Source: 2005 UWMP and the SB 610 Water Supply Assessment for the Gate-King Project.

^b Demand is increased by approximately 10% in dry years.

^c Dry-year supplies available above demand reflect water supplies that would be called upon by purveyors in dry years. Purveyors would typically secure water from these supplies only in amounts necessary to meet demand.

8. MITIGATION MEASURES

While the proposed project does not create significant water resource impacts, the following measures are proposed in order to reduce the project's demand for water:

- 3.0-1 Landscape concept plans shall include a palette rich in drought-tolerant and native plants.
- 3.0-2 Major manufactured slopes shall be landscaped with materials that will eventually naturalize, requiring minimal irrigation.
- 3.0-3 Water conservation measures as ~~required~~ recommended by the State of California shall be incorporated into all irrigation systems.
- 3.0-4 Prior to commencement of use, all uses of recycled water shall be reviewed and approved by the Castaic Lake Water Agency ~~the State of California Health and Welfare Agency, Department of Health Services.~~
- 3.0-5 Prior to the issuance of building permits that allow construction, the applicant of the proposed project shall finance the expansion costs of water service extension to the subdivision through the payment of connection fees to the appropriate water agency(ies).

9. SIGNIFICANT UNAVOIDABLE IMPACTS

A. Project Impacts

With or without the implementation of the project mitigation measures provided in this Additional Analysis, the project would not result in or contribute to any significant unavoidable impacts on Santa Clarita Valley water resources.