



Friends of the Santa Clara River

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Board of Directors

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7-18-23

Santa Clarita Water Agency
27234 Bouquet Canyon Road
Santa Clarita, CA 91350

Sent via email to ajacobs@scvwa.org

Re: Mitigated Negative Declaration (MND) Wellhead Treatment
Facilities and new well S9 (not included in document title)

Dear Sirs:

We recently received your response to our 12-19-22 letter on this
MND and have the following additional comments.

We wonder why the title of this document did not specify and make
clear to the public and interested parties that this project is not only to
add clean up facilities but also to add a new well that would pump up
to 1000 AF. We believe that not all concerned parties may have
understood that a new well was to be added in this area and so may not
have commented. The lack of transparency in the document title
remains concerning.

In your response to comments you state the GSP allows 2400-4800 AF
to be pumped from these wells. Your response states that you will not
exceed these amounts. Yet the document itself continues to state in the
project description that 1000 AF of production will be added. The
project description is therefore inaccurate.

Also, if you are not going to increase well production and the three
existing wells already produce the amount allowed by the GSP, why
are you spending the considerable amount of money to install a new
well?

Again, since the project description includes increased well
production, we believe the agency must correct the project description
for this MND to eliminate the additional pumping discrepancy.

Upon review of well pumping records posted on your website, we note that these wells seem to have always been pumped at the low end on the above stated range. We also note that the Mitchell Well 5A which this new well purports to replace has not produced at all or only an extremely small amount for many years and is located at a long distance from the S Wells.. We wonder how this could really be a replacement well.

We also have concerns about the accuracy of the modeling which seems to have occurred when the Mitchel Well was not producing and the S wells were closed due to PFAS pollution.

As previously stated, our concern over adding additional pumping and potentially inaccurate GSP modeling results from the sensitivity of the reach where this new well is to be added. The Agency was well aware of the numerous endangered birds, amphibians and fish that are located in the project area or downstream and use the riparian habitat, federal and state listed endangered species including migratory birds such as the Southwestern flycatcher and Least's bell's Vireo, both found in areas immediately adjacent to this location. Migratory birds often nest in these riparian areas in or adjacent to the Santa Clara River. There may also be other endangered amphibians and reptiles such as the arroyo toad and legless lizard.

According to the original MND, only two cursory surveys were conducted one on February 23rd and another on August 30, 2022. But apparently no protocol surveys were conducted to provide information and disclosure for impacts to these special status species, and no mitigation provided to ensure that surveys will be done.

Instead, a Compendium in the appendices merely lists the potential for these species to exist on site. This is not acceptable, nor does it adequately capture impacts and therefore mitigation. It is also unclear whether the California Department of Fish and Wildlife (CDFW) was notified about the project and given an opportunity to comment, or if a permit been granted by the United States Army Corps of Engineers to work in the river.

It is inappropriate for the agency to use an MND to approve a project where endangered species are known to be present. According to maps and other information cited in *Wildlands of the Santa Clara River*¹ and other documents known to the agency, endangered species are present in this area.

¹ Available on line at <http://www.scwildlands.org/> and incorporated by reference.

Of course, the Friends understand the need to provide safe drinking water by installing well head treatment on the existing S wells. But the high noise levels may impact nesting birds and other wildlife in this sensitive habitat area. While the MND suggests BIO – 5, surveys 3 days prior to beginning construct, to protect nesting birds, however the noise would prevent birds from nesting in the first place in one of the few remaining places they have to do this. We remind the Agency of the successful litigation in 2000 brought by the Friends of the Santa Clara River to prohibit the use of hazing machines by Newhall Land to stop bird nesting so they could proceed with their construction. Bio – 5 should be changed to read that construction will not occur in bird nesting season.

We believe there is a way to resolve these issues while still ensuring a healthy drinking water supply. We continue to ask that a new document that includes potential alternatives such as extra noise walls, avoiding construction in nesting season, or locating the well head treatment to a location further away from the river and piping to that facility (as has been a solution in other areas of your agency) be investigated and considered. Currently, the MND provides no alternatives. We ask that an alternatives analysis be provided in a new circulated document, with adequate notification to partners, stakeholders and resource agencies.

Again, this MND appears to try to evade the update by Department of Water Resources (DWR) in Bulletin 74 Well regulations that address drilling wells in polluted aquifers. The Division of Drinking water also has regulations governing new wells in polluted drinking water sources. Has the DWR and the Drinking Water Division been notified of this MND as we previously requested and did they have the opportunity to comment on it? Were they informed that it involved the drilling of a new well in a polluted aquifer? We are concerned that the misleading title may have hidden your intention to drill a new well.

Please provide an adequate document that includes impacts by pumping from a proposed new well and a time extension for comment.

Sincerely,



Candice Meneghin
Board Member

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**VALENCIA WATER DIVISION
WATER PRODUCTION 2018 (ACRE-FEET)**

ALLUVIUM	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL
D	43	49	27	60	62	79	93	92	87	72	55	33	752
E15	51	44	31	32	43	53	78	70	73	68	42	35	619
N	63	67	31	84	72	115	139	112	80	64	59	60	948
N7	61	138	69	101	137	78	104	118	100	230	105	99	1340
N8	65	100	58	92	130	75	107	122	111	72	116	116	1165
Q2	39	69	40	90	92	113	130	123	113	116	100	74	1100
T7	4	7	16	7	8	10	6	4	6	12	6	5	90
U6	5	8	12	14	11	4	9	8	6	12	8	5	102
U4	3	6	10	6	6	7	5	4	3	6	3	4	63
S6	65	124	39	81	104	95	147	189	153	145	94	113	1350
S7	15	28	25	43	57	45	68	51	37	56	44	35	503
S8	24	32	17	44	62	60	53	89	69	32	49	27	558
W11	41	34	28	23	37	65	124	110	72	69	30	16	648
W9	3	2	6	29	29	20	24	21	20	22	16	20	214
W10	65	118	28	111	120	143	169	150	113	140	104	123	1384
TOTAL ALLUVIUM	548	825	441	817	970	963	1255	1263	1041	1117	832	765	10837
SAUGUS	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL
159	3	4	1	12	6	0	0	0	0	0	0	0	27
160 - DOM	1	1	1	1	1	1	1	1	1	1	1	2	14
160 - VGC*	22	28	11	57	56	82	93	77	77	54	34	14	607
201	0	0	0	0	0	0	0	0	0	0	0	0	0
205	0	0	0	0	0	0	0	0	0	0	0	0	0
206	71	59	30	95	153	141	131	134	142	132	119	124	1330
207	66	68	92	94	112	147	186	157	121	158	153	139	1493
TOTAL SAUGUS	162	161	135	261	330	371	411	369	341	345	307	279	3471
IMPORT WATER	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL
V-1	95	96	58	94	101	136	174	186	168	145	104	72	1429
V-2	220	108	131	273	315	436	510	518	490	204	244	92	3540
V-4	91	62	22	40	119	108	234	246	200	274	224	64	1686
V-5	183	153	172	307	348	411	394	374	322	186	154	71	3077
V-6	150	137	111	164	202	185	144	144	122	133	118	88	1699
V-7	24	36	25	51	71	61	71	93	59	53	57	32	633
V-8	91	84	100	230	180	284	393	465	381	305	183	39	2736
TOTAL IMPORT	853	676	619	1,160	1,336	1,622	1,921	2,026	1,743	1,300	1,084	459	14,800
TOTAL GROUNDWATER	710	986	575	1,077	1,300	1,334	1,666	1,633	1,382	1,462	1,139	1,043	14,308
TOTAL IMPORT	853	676	619	1,160	1,336	1,622	1,921	2,026	1,743	1,300	1,084	459	14,800
TOTAL PRODUCTION	1,564	1,662	1,194	2,237	2,636	2,967	3,587	3,659	3,125	2,762	2,223	1,502	29,108
% BY SOURCE													
GROUNDWATER	45%	59%	48%	47%	48%	44%	45%	43%	43%	52%	50%	69%	48%
IMPORT WATER	55%	41%	52%	53%	52%	56%	55%	57%	57%	48%	50%	31%	52%
RECYCLED WATER	15	14	9	39	39	64	79	75	17	0	0	0	352
Well 201 Discharge	224	201	128	155	154	149	153	148	148	165	154	153	1931

*Not used in the calculation for % by source