

DRAFT 2020 Water Shortage Contingency Plan

Public Comments

Comment Period: March 12, 2021 – April 12, 2021

 From:
 Tom Jones

 To:
 wscp

Subject: comment re: shortage planning

Date: Tuesday, March 16, 2021 7:13:45 AM

CAUTION - EXTERNAL SENDER

I must admit, should we have curtailments and associated costs, I think many people will be really upset as how can you expect us to sacrifice when you have agreed and supported continued population growth and building in the area you serve. When has a drought shortage not been a threat in our area? Excess growth just makes it worse. Hard to voluntarily sacrifice when your agency has encouraged more users.

Thomas Jones 661-298-9553

Sent from Mail for Windows 10



Friends of the Santa Clara River

PO Box 7719

Ventura, California 93006 www.fscr.org (805) 320-2265

April 12th, 2021

Matt Dickens, Sustainability Manager SCV Water Agency 26521 Summit Circle Santa Clarita, CA 91350 Sent via email wscp@scvwa.org

Re: SCV Water Shortage Contingency Plan

Please copy to all Board Members

Honorable Board Members and Staff:

The Friends of the Santa Clara River were formed in 1993 to provide oversight and conservation efforts in the Santa Clara River Watershed. In accordance with that mission, we have been active in water planning programs throughout the watershed for over two and a half decades and have commented on many water issues including the UWM Plans produced by your predecessor agency.

We have reviewed the Water Supply Contingency Plan provided by your agency and have the following comments.

Report is Incomplete

First, we note that the plan provided on your website is not complete. On Page 3 of the Summary a Table number for the "recovery of Alluvial supplies over the next decade" from PFAS pollution is left bland and no table is provided. Further in the document on page 10, this same vital piece of information is missing: "Use the quantification numbers referenced in the UWMP tables for total amount available with and without PFAS wells each year moving forward (not completed yet)" We are aware that approximately 40% of your ground water wells are closed due to this pollution with only two in some stage of having wellhead treatment added to return them to service. Thus, failure to include this information is not acceptable. It is not possible to provide comments on the Plan without this information, since your drought water cutback levels are based on supply verses demand. Again, inadequate information as to what is the real supply, makes such an evaluation impossible.

Polluted Water Supply Can Not Be Counted

Further, you may recall that a previous CLWA UWMP was set aside on this very issue of including polluted water in the total supply when in fact it is not really available. In Friends

of the Santa Clara River v. Castaic Lake Water Agency, 2004¹, the Agency's plan was over turned by the Court for doing exactly that. The court's key concern in this ruling appears in one sentence: "Timing considerations of other aspects of the perchlorate contamination also affect the reliability of the supply of groundwater."

The Agency's Plan leaves this very issue incomplete, and therefore unaddressed. The public cannot effectively comment on this plan without the inclusion of information regarding a time table for PFAS clean up.

Therefore we ask that the comment period be extended and the completed document be recirculated.

This failure to acknowledge the impact of water pollution and well closures, and abide by a previous court decision permeates the entire document. It arises also in the Agency's calculation of available Saugus formation ground water supply where several wells are currently closed due to perchlorate and VOC contamination with an estimate that this source may not be fully cleaned up for 40 years. Calculations of availability of supply from this source of up to 35,000 AF are thus overstated and factually incorrect.

The proposal that an Aquifer Storage and Recharge (ASR) program in the Saugus Aquifer may be available to provide a future water supply is also out of the question at this time due to ammonium perchlorate and other pollutants in this aquifer. This additional potential source should be removed from your list since the projected 40 year timeline for cleanup of this aquifer is beyond the horizon of this plan.

State Water Supply Reporting

After over a decade of litigation starting in the 1990s and spilling over into the new millennium regarding the overstatement of state water supply reliability and the Monterey Agreement, we were surprised to see the Agency continue with this mis-representation. On Page 10 the Contingency Plan states: "SCV Water provides DWR with a range of scenarios for our imported water needs based on different allocations (100%, 60%, 50%, 30%, 15%).

Your Agency and its predecessor has never actually received 100% of your 95,000AF entitlement that is included in this list, or the "95.000AF" as mentioned elsewhere to be available. One hundred per cent has only been achieved in two years in the 1980's according to DWR's most recent Water Delivery report (2019) and has not been realized since (in 40 years). To give residents the false hope that the Santa Clarita valley might ever receive a full water entitlement is not realistic. It challenges your agency's supposed commitment to transparency and diminishes its credibility. We include the table below from the DWR SWP Water Delivery Capability Report for wet years for your reference²:

¹ Friends, Santa Clara R. v. Castaic Lake Water A., 123 Cal.App.4th 1, 19 Cal. Rptr. 3d 625 (Cal. Ct. App. 2004)

² The Final State Water Project Delivery Capability Report 2019 August 26, 2020, pg 28

Table 5-5. Estimated Average and Wet-Period Deliveries of SWP Table A Water (Existing Conditions, in TAF/year) and Percent of Maximum SWP Table A Amount, 4,133 TAF/year

	Long-term Average		Single Wet Year (1983)		Wet Periods									
Year					2-Year (1982-1983)		4-Year (1980-1983)		6-Year (1978-1983)		10-Year (1978-1987)			
2017	2,571	62	4,098	99%	3,967	96%	3,569	86%	3,433	83%	3,163	77		
Report		%										%		
2019	2,414	58	4,008	97%	3,750	91%	3,330	81%	3,210	78%	2,967	72		
Report		%										%		

As you can see, the 2019 Report states the long term average is 58% for wet years. Any reference to 100% should be removed.

Of course, average and dry years will produce much less water from the State Water Project on which you Agency depends³.

Table 5-6. Estimated Average and Dry-Period Deliveries of SWP Table A Water, Excluding Butte County and Yuba City (Existing Conditions, in TAF/year) and Percent of Maximum SWP Table A Amount, 4,133 TAF/year

Year	Long-term Average		Single Dry Year (1977)		Dry Periods										
					2-Year Drought (1976-1977)		4-Year Drought (1931-1934)		6-Year Drought (1987-1992)		6-Year Drought (1929-1934)				
2017 Report	2,571	62%	336	8%	1,206	29%	1,397	34%	1,203	29%	1,408	34%			
2019 Report	2,414	58%	288	7%	1,311	32%	1,228	30%	1,058	26%	1,158	28%			

Accurately reporting State Water Supply has been an issue of concern to the Friends of the Santa Clara River for over two decades as indicated by our objection in 2000 and the resulting litigation that ended in the Court setting aside a state water transfer CEQA document (*Friends of the Santa Clara River v. Castaic Lake Water Agency*, Feb. 6, 2002, 95 Cal.App.4th 1373)

Reduced Future Availability of Water Supply from Northern California

The Santa Clarita Valley currently receives approximately 50% of its water from Northern California in normal years. But due to climate change, scientists have modeled a severe loss of the snowpack that will supply that water in future years. While previously State Water Project Water from Northern California could be relied upon to provide that water, scientists now say that Climate Change will reduce snowfall in the Sierras by as much as 64%⁴ and thus reduce water available from that source for communities in Southern

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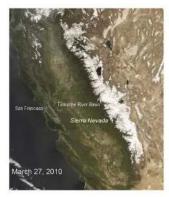
³ *Ibid*, page 30

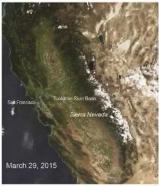
⁴ See Los Angeles Times article by Alex Hall is a professor of atmospheric and oceanic sciences at UCLA

California. For example, in drought years, such as the most recent severe drought of 2010-2016 snow pack all but disappeared and communities such as the Santa Clarita Valley were left to rely only on their own ground water.

Again, although snowpack was higher than normal year in 2017, that trend has not continued and with the rise in temperatures predicted by climate change, average Sierra snowpack will decrease in the future making imported water from Northern California more difficult to obtain. Droughts are cyclical, but as they become longer and more severe, water from Northern California will become less available.

While we understand the Agency's legal requirement to use the DWR Water Delivery Capability Report, we urge you to include some information about climate change so that the public will be aware of the probability of a severely shrinking water supply due to climate change.





March 2015, snow pack estimated to be at a five hundred year low.

Conclusion

Water Code Sections 10632 and 10826 - The **contingency plan** must demonstrate the ability of an agency to meet demands under a supply **shortage** of up to 50 percent. Emphasis is placed on protection of public health, sanitation, fire protection, and the general public welfare.

We believe that the Agency's proposed calculation of these shortages will be inaccurate due to its failure to accurately outline what the real water supply actually is and include the missing tables. In its current iteration the Plan fails to meet the goals above, as described in the water code.

Sincerely,

James Danza

James Danza

Chair

and director of the university's Center for Climate Science, https://www.latimes.com/opinion/op-ed/laoe-hall-reich-sierra-snowpack-climate-change-20180402-story.html

From: Sheila
To: wscp

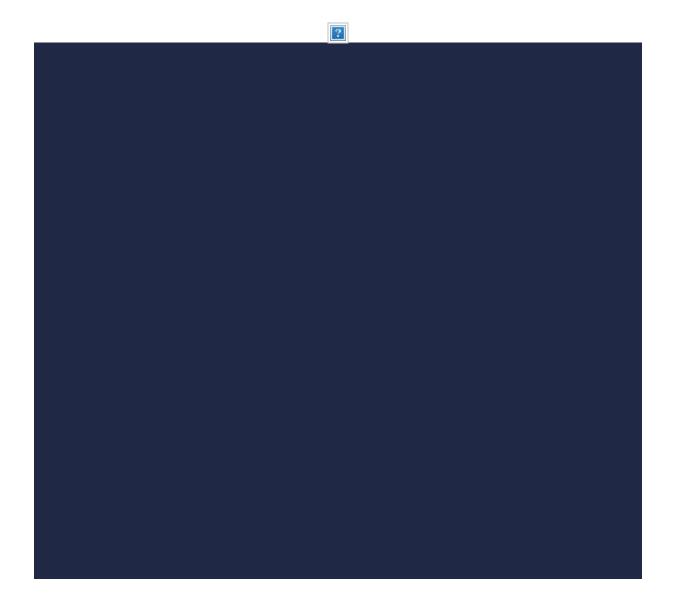
Subject: Re: Special Edition - Comment Period Open for Water Shortage Contingency Plan

Date: Monday, March 15, 2021 1:31:23 PM

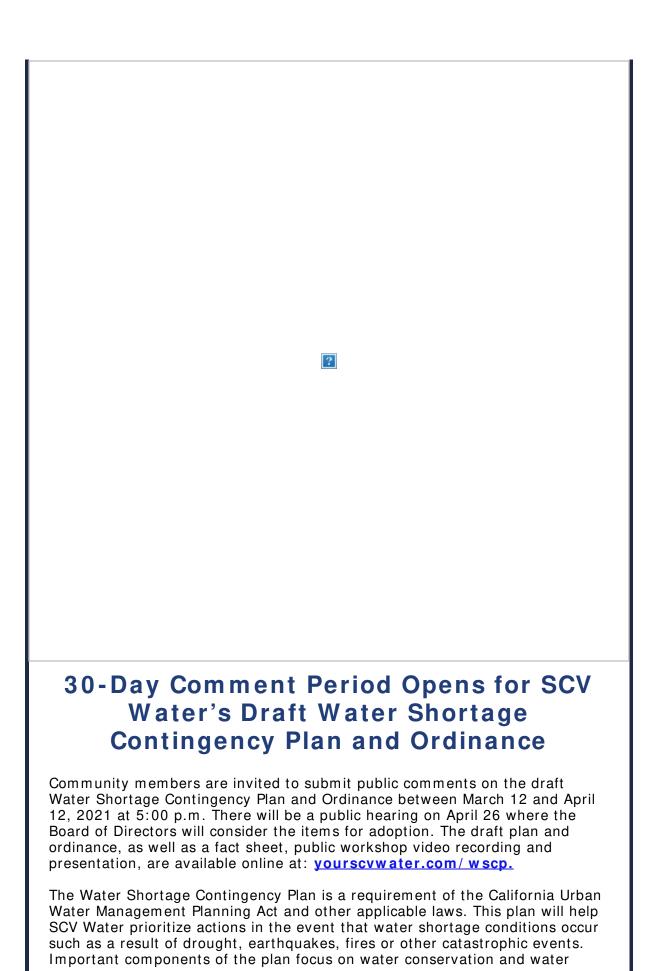
CAUTION - EXTERNAL SENDER

Easy solution for any up coming water shortage.. QUIT BUILDING HOUSES! put into effect a building moratorium for the next 5 yrs and after that vote on if there is enough water to justify a certain amount of new homes.. If there is a shortage then no homes permits will be given out for building homes.... Not only will the water be effected but our roads will be conjested..

On Monday, March 15, 2021, 01:05:15 PM PDT, SCV Water <wscp@scvwa.org> wrote:







shortage planning.

How to submit public comments

Comments can be submitted directly through the website at: yourscvwater.com/wscp.

The public can also submit comments by one of the following methods and should include "Water Shortage Contingency Plan Comment" in the subject line of your email or letter. All comments must be postmarked or emailed by April 12, 2021.

Email:

Matt Dickens
Sustainability Manager
SCV Water
wscp@scvwa.org

Hard Copy via U.S. Mail:

Matt Dickens Sustainability Manager SCV Water 26521 Summit Circle Santa Clarita, CA 91350

We hope you will participate in the process and encourage you to share this email with others who may be interested.

Best Regards, Sarah Fleury, Water Resources Planner Santa Clarita Valley Water Agency

SCV WATER

27234 Bouquet Canyon Rd Santa Clarita, CA 91350 yourSCVwater.com (661) 297-1600



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Sent by wscp@scvwa.org

SCOPE

Santa Clarita Organization for Planning and the Environment

TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY

POST OFFICE BOX 1182, SANTA CLARITA, CA 91386

www.scope.org



4-12-21

Matt Dickens, Sustainability Manager SCV Water Agency 26521 Summit Circle Santa Clarita, CA 91350

Re: SCV Water Shortage Contingency Plan

Sent via email wscp@scvwa.org Please copy all Board Members

Dear Mr. Dickens:

Santa Clarita Organization for Planning and the Environment was founded in 1987 to focus on planning and conservation issues in the Santa Clarita Valley, watershed of the Santa Clara River. We have participated in numerous water planning processes over the past two decades

Methodology

The Plan proposes to establish levels when the ratio of supply verses demand is reduced. At certain levels of demand verses supply, reductions will begin to be required. It is not clear exactly what the formula will be.

We believe this results in subjective interpretations of when cutbacks will be required based on the agency's interpretation of supply. For instance, the Agency has stated that it has an alluvial supply of 30,000 to 40,000 AF of water based on its operating plan. However, that operating plan didn't work in the 2010-2015 drought. Water levels dropped, which reduced or eliminated production from several wells. In a 2015 Technical Memorandum produced by GSI Solutions¹ for CLWA, SCW Agency's predecessor agency found that without digging deeper or additional wells:

Rainfall records, groundwater level monitoring, and groundwater modeling together indicate that little to no recharge has occurred to the Alluvial Aquifer since the winter of

2010/spring of 2011 rainfall season. The groundwater level monitoring program shows that groundwater levels have declined at a fairly steady rate since that time, as has been

observed in other past periods of local drought conditions (such as occurred in 1984 through 1992 and again in 1999 through 2004). The continued decline in groundwater levels that was observed in 2014 at many Alluvial Aquifer wells will continue in 2015 if little to no rainfall and streamflow recharge occurs to the local aquifer systems during

¹ Evaluation of Groundwater Pumping Targets for the Alluvial Aquifer in 2015 Santa Clara River Valley East Subbasin (Santa Clarita Valley, California), John Porcello, GSI Water Solutions, Inc., 2015

the winter of 2014/spring of 2015 rainfall season.

Under this scenario, and assuming there are no new wells or modifications to existing wells and pumping systems, GSI's primary conclusions regarding the achievability of the target pumping volumes from the Alluvial Aquifer in 2015 are presented in Table 1 and are summarized as follows:

1. For the three retail water purveyors combined, the achievable yield from the Alluvial Aquifer in 2015 is likely between 17,100 and 21,800 AFY. The Groundwater Operating Plan's drought-year target of 27,400 AFY of collective production by the three retail water purveyors will not be achievable if the drought continues through the winter of 2014/spring of 2015 rainfall season.

2. The largest shortfall in yield is estimated to occur for VWC. The estimated achievable production volume for VWC wells (between 14,600 and 17,900 AFY in 2015) creates shortfalls of (a) 3,600 to 6,900 AFY compared with VWC's target production under the Groundwater Operating Plan and (b) 1,100 to 4,400 AFY compared with the 2015 target production volume that was of interest to VWC.

Thus, if the Agency subjectively chooses to use the operating supply of 30,000 to 40,000 which it knows to be unachievable in a drought, the Board might not vote for the demand cutbacks in sufficient time to reduce demand, because they believe the supply to still be sufficient.

• The drought year operating plan should be reduced in the face of this actual loss of well production. Further, this report should be included as a reference in the Plan documents.

Counting Contaminated Water

SCOPE and others have opposed the Water Agency's continued inclusion of contaminated water for two decades. In an adverse Court decision in 2004 against its processor agency, the CLW Agency was ordered to stop counting the water and include a timeline of when it would be available².

That timeline does not exist in this report for 17 wells polluted with PFAS (where the page and reference is actually left blank with a note that it will be coming at a later date) or for the claimed Saugus production of 15,000 and up to 35,000AF from this contaminated aquifer, also with many closed wells. The Agency is well aware that it cannot produce the amount of water that it alleges to have, and that it has failed to provide the time lines required.

 Contaminated water production from closed wells should not be included as available to the public. This water must be removed from the Agency's water availability figures.

Also, we cannot understand how you can circulate a document for public comment that specifically and knowingly leaves out such important information as a PFAs well treatment timeline³.

 An incomplete report does not provide all the information needed by the public for its review. The comment time period should be extended and the report should be recirculated, once it is complete.

³ See Report, Pages 3 and 10

² Friends, Santa Clara R. v. Castaic Lake Water A., 123 Cal.App.4th 1, 19 Cal. Rptr. 3d 625 (Cal. Ct. App. 2004)

A more objective way to calculate supply reductions might be to base the reduction on the percentage below normal of rainfall, (that would reduce water into the alluvial aquifer as defined in the GSI Memo); or, the percentage of reduction of state water supplies; or, the drop in ground water levels.

State Water Project Table A Supply

We note that the agency has never received a full 100% of entitlement, and that this level of delivery is not anticipated anywhere, even for wet years in the DWR's Delivery Capability Report⁴. Therefore, all references to receiving 100% of entitlement or 95,200AF should be removed from the Plan.

Recycled Water

While we concur that recycled water is a needed offset, the Agency currently has some large impediments to producing that water.

First, currently the Agency may not take additional recycled water without applying for a permit to reduce flow to the Santa Clara River. The Sanitation has refused to do this. Only "new" water can be used. It is unclear how much additional recycled water beyond what is already in use might be available, and any estimate would only be a subjective projection at this time.

Second the Agency appears to be building the recycled water infrastructure only for Newhall Ranch as indicated by tanks and pipelines being constructed in an area to serve the Mission Tract of the Newhall Ranch Project. We are also aware of the 2012 purchase agreement that promised all the recycled water it needs or wants to the Newhall Ranch⁵. So it appears that recycled water will not be available elsewhere in the Valley, except for the immediate neighborhoods adjacent to Vista Canyon.

Third, during the development of the Salt and Nutrient Plan for the Valley, use of recycled water for landscaping was identified as a potential major obstacle foe recycled water use. We understand that the Valencia treatment plant will use RO to reduce salt, however, to our knowledge, the Vista Plant does not have an RO facility for salt removal. Please address this issue.

SCV Additional Sources - back up

According to the Plan, the Agency currently has two banking programs. The Rosedale-Rio Bravo Bank can store up to 100,000 AF and can currently recover 10,000 AFY. The Semitropic Bank can store 35,000 and recover 5,000 AFY. We are unclear as to whether the Semitropic bank

belongs to the Agency or Newhall Land and Farming. If it is the later, it should be noted that the Agency does not own or control that water. We also have been informed that there may be water

⁴ Table 5-5. Estimated Average and Wet-Period Deliveries of SWP Table A Water(Existing Conditions, in TAF/year) and Percent of Maximum SWP Table A Amount, 4,133 TAF/year

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2019 Report	2,414	58 %	4,008	97%	3,750	91%	3,330	81%	3,210	78%	2,967	72%		

(The Final State Water Project Delivery Capability Report 2019, August 26, 2020, pg 28)

⁵ See section 6.11, Valencia Water Company purchase agreement, 2012, included by reference

quality issues in the Semitropic water bank (i.e., arsenic). Can water be obtained from this facility without a arsenic removal system? If not, is such a system operating for the storage bank?

Future Supplies

Saugus Recharge and Recovery – This potential resource should not be listed since it is unlikely that the clean up of this currently contaminated aquifer would be completed within the timeline of the report. Thus, a recharge permit from the State would likely not be granted in a time period that would allow its use for a drought.

Additional new sources – in a time of worsening drought throughout the state, it is unlikely that such sources would become available.

We recommend that you include instead of the above a much more rigorous program to
promote local ground water recharge, mapping of potential recharge areas and more
involvement in making comments in the County and City planning process to ensure
permeable pavement in new projects, that recharge areas are preserved, and that streams
are not concreted.

Individual page comments

Page 23-24 Table 4 is not consistent with the requirements of the ordinance. Will the ordinance be enforceable when items are not also listed in the Plan?

Page 34 Seismic Risk Assessment – no evaluation of the major risk of earthquake-caused interruption to the Edmonston pumping plant station was included in this discussion. This is a real threat, since shutdown of these pumps would entirely stop SWP water from reaching the Santa Clarita Valley. In fact, an earthquake caused failure that put the plant out of service already occurred once June 1988⁶ –because of earthquake. The station is close to the San Andreas fault and the site of the Tejon Ranch 1857 quake, the largest ever recorded in California.

Water demand calculations don't seem to include Newhall agricultural use, grading, Honor Rancho demand, or private well use. These demands should be included in all calculations.

A temporary increase in the top tiers of water use to provide further incentives for users in these categories to find ways of reducing demands.

Stage 4 Prohibition against hydrant use except for firefighting No new connections unless a reduction in exiting sources (toilet replacement, etc.)

Resources and References - Additional References that should be included or referenced

1. Why is the Agency using the 2018 Water Supply Report instead of the 2019 Report which was released in May 2020 almost a year ago. Please include the 2019 Water Supply Report.

⁶ https://www.latimes.com/archives/la-xpm-1988-06-12-me-7051-story.html

- 2. Final State Water Project Delivery Capability Report 2019, August 26, 2020
- 3. Evaluation of Groundwater Pumping Targets for the Alluvial Aquifer in 2015 Santa Clara River Valley East Subbasin (Santa Clarita Valley, California), John Porcello, GSI Water Solutions, Inc., 2015
- 4. A link to the SCWA well records located on the Agency website so that the public can be made aware that these records are available for reference and research.

Comments on the Plan Ordinance and Ordinance Resolution

First, an increased allowance for residents who own livestock such as horses, etc., should be included in the code and allowed at all cutback levels.

The cutbacks are based on demand, but all demands such as grading, private wells and the Honor rancho are not included.

Having six drought stages instead of five causes redundancy in the first two stages. Why does the Plan have stage one as described. It is what everyone is supposed to be doing anyway.

• We recommend eliminating stage 1 and having five stages.

No hard indicators of drought levels, only the "agency's sole discretion", could lead to political manipulation or avoidance of hard but necessary decisions to protect the community's health and well being. It will most probably also lead to confusion on the part of the public when others say we are experiencing a drought, but the agency is taking no action to address it. It is also not clear how compliance with cutback levels at the different stages will be determined.

• We recommend that you never allow grading with potable water. This reduction is not required until stage 4.

Please explain how the agency will police water usage times.

Early penalties do not seem sufficient to dissuade water use.

Does water a total water shut off comply with state law?

Who is going to review the waivers and under what conditions are they granted?

The agency should consider a temporary cost increase in the top tiers of water use to provide further incentives for users in these categories to find ways of reducing demands.

Thank you for your attention to our concerns.

Llove E. Carder II

Sincerely

SCOPE Board Member

From: markk60@ca.rr.com

To: wscp

Subject: Water Shortage Contingency Plan Comment

Date: Sunday, March 14, 2021 10:27:06 PM

CAUTION - EXTERNAL SENDER

Why don't we just admit to ourselves that SCV water has reached it's capacity limit and stop building new homes? The city allows new homes to be built to increase their tax revenue, but when water shortages come about we, the homeowners, pay the price in both shortages and increased prices.

From: John Machin
To: wscp

Subject: Water Shortage Contingency Plan Comment Date: Monday, March 29, 2021 6:18:09 PM

CAUTION - EXTERNAL SENDER	

To Whom It May Concern:

How does SCV Water contemplate a water shortage contingency plan AFTER it granted approval for the 25,000 home Newhall Ranch development, along with the countless other smaller developments in Santa Clarita Valley? In doing so, SCV Water must have anticipated there will be more than enough water in the future, rendering a water shortage contingency plan unnecessary. Or, did SCV Water commit to future water resources that cannot be counted on?

I am sure SCV Water will state that the Newhall Ranch development is receiving water from some other source. If that is the case, shouldn't that other water source have been counted on for SCV Water's water shortage contingency plan? Or, is it just easier to tell the public there is no sensical explanation to any of this?

John Machin

From: James
To: wscp

Subject: Water shortage plan

Date: Tuesday, March 16, 2021 8:33:24 AM

CAUTION - EXTERNAL SENDER

SCV population must be limited as a means to address a future water shortage. Your department should advise city planners To plan for shortage in resources including water.

No more homes built in SCV. Including apartments.

Best Regards Jim Kiswardy c 661-855-0084 From: Chris Mohler
To: wscp

Subject: Water Shortage

Date: Wednesday, April 7, 2021 9:31:35 AM

CAUTION - EXTERNAL SENDER

I have one question! Why does the City of Santa Clarita/Los Angeles County continue to allow the building of new commercial and residential property when they know this is putting a burden on the local resources?

Our local government continues to over burden the roads, water and electrical resources.

Thanks, Chris Mohler

Sent from my iPad