

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



11-6-10

Jeff Hogan
City of Santa Clarita
23920 Valencia Blvd.
Santa Clarita, CA 91355

PLEASE COPY TO ALL PLANNING COMMISSIONERS

Re: Vista Canyon - MASTER CASE NO. 07-127, ANNEXATION 07-002 A & B (INCLUDES AMENDMENTS TO THE CITY'S SPHERE OF INFLUENCE), PRE-ZONE 07-001A & B, GENERAL PLAN AMENDMENT 07-001A & B, SPECIFIC PLAN 07-001, TENTATIVE TRACT MAP 69164, CONDITIONAL USE PERMIT 07-009, OAK TREE PERMIT 07-019, ENVIRONMENTAL IMPACT REPORT SCH NO. 2007071039

Dear Mr. Hogan:

We submit these initial comments for the record. We will be providing additional detailed comments as the public review process proceeds. We note that we have attended every public hearing on this project and presented oral testimony on the adequacy of the Environmental Impact Report at those hearings. We expect, and CEQA requires, that a response to those timely oral comments be provided.

Due to the extent of this environmental document, estimated at some 10,000 to 20,000 pages, including appendices that must be reviewed for accuracy and consistency, and added to the other three major planning projects now in process (the County General Plan update, the City General Plan update and the Mission Village tract of Newhall Ranch), each numbering approximately the same amount of pages as this document, all by the same EIR consultant, Impact Sciences, we were unable to provide written comments within the assigned comment period.

However, CEQA requires that these written comments be considered even if the consultant and the applicant choose not to provide responses to them. We will be circulating a copy of our comments to each of the commenting agencies and to the Planning Commission for their reference and review.

Request for Extension of the Comment Period Denied

We note that the comment period began before the DEIR was even provided to the Planning Commission or the public. For that reason and due to the voluminous amount of material covered by this document, we believe that the comment period should have been extended as was immediately requested by several commentors at the first hearing. Such an extension would not

have been an imposition since the planning department has announced a schedule of several public hearings before the Planning Commission extending into 2011.

Such an extension would have allowed other interested parties and agencies full access to all comments and responses in the final document and would ultimately benefit this project by providing the decision-makers a thorough review of the proposal.

We also assert that the comment period should now be extended because essential information is missing from the provided documentation.

For example, in our initial review two reports listed as available in the Table of Contents are missing from the Appendices in the Flood section:

PACE, Drainage/Fluvial Study (2009)

Alliance Land Planning and Engineering, Inc., Drainage Concept/SUSMP Vista Canyon

These reports are essential for evaluating the flood hazards and channelization proposals in this project. **Please provide these reports to all noticed recipients of the DEIR.**

We are concerned that other listed information may also not be available for review, but the short review period for this extensive document has not allowed us time for a full investigation of the appendices.

In addition, information needed to verify statements made at the public hearing is not available in the DEIR or in the appendices.

Annexation

Our initial concern is the proposal for a general plan amendment and an annexation into the City of Santa Clarita from the County jurisdiction. We believe that such an action is inappropriate prior to the current general plan update. Since the County and City general plan are proceeding as two separate documents, it makes that review confusing and possibly inconsistent. We therefore request that this annexation not be processed until after the completion of the general plan update unless the current County zoning (700 units, not 1350 units) and Significant Ecological Area protections are included in the current project proposal.

We believe such sequencing is particularly appropriate in light of the substantial opposition to the included additional annexations by residents of those areas.

FEMA Line

The applicant should apply for an Army Corps 404 permit and streambed alternation permit prior to Plan approval so that the plan incorporates their concerns. The FEMA line is not an acceptable substitution for the resource line as will be delineated by the California Dept. of Fish and Game and the Army Corps of Engineers. The City has long touted its intention of protecting the Santa Clara River. If this is really the case and not just rhetoric, then the most protective resource boundaries should be delineated, not the least.

This Plan proposes to fill the floodplain to create a new FEMA line, and then use this new delineation as the resource boundary. From even a preliminary review of the maps, it is obvious that such a ruse is not protective of the existing riverine resources. Further, FEMA does not have

the authority to make such resource decisions. A plan that narrows the river channel, creating increased flow velocity at pinch points up stream and down stream is not protective of the river resource or ground water recharge. It also does not comply with the LA Regional Water Quality Board's Resolution on Hydromodification. (Attached).

As indicated by the DEIR, the required 7,500' linear feet of buried soil cement bank protection substantially narrows the river. In the Significant Hazard chapter of the DEIR states that this modification will cause water to raise in immediate area, but will dissipate in upstream and downstream areas. This is consistent with well-known flood patterns identified by the Army Corps of Engineers in other areas. (Please see attached graphic). Further, the US Geological Survey has recently indicated the potential for extreme flooding events in the Southwestern US due to weather changes caused by global warming.¹ The only way to safeguard the community against such an event is to preserve the floodplain.

The applicant has represented to you that FEMA has approved the project. In fact the letter from FEMA states that his project will increase downstream flows and raise water levels. The FEMA process will require that downstream property owners be notified and that they accept the flood risk. After notification, there is a 90-day appeal process in which they can challenge the approval. FEMA will require proof that the downstream property owners have been notified.²

We believe the City should notify the property owners in those areas now so that they can participate in the CEQA process. How will that affect flooding in these areas? Will it cause a change in the flood maps for their area and increase their flood insurance? This issue must be addressed in the DEIR.

The impact of 500,000 cubic yards of compacted fill imported from off site along with additional onsite fill totaling an estimated at 830,000 cubic yards used to fill the floodplain, will reduce ground water recharge needed to replenish municipal wells that already have severally reduced production in the dry session. An additional 1.7 million cubic yards of "remedial" fill is also indicated by the DEIR. PLEASE PROVIDE AN ANALYSIS OF THE LOSS OF GROUND WATER RECHARGE DUE TO FILLING AND COMPACTION OF THE FLOODPLAIN. Compacted fill will reduce the efficiency of permeable pavement and increase run off.

Since it appears that part of the soil used for this project will come from or near the Whittiker Bermite or NTS propoerties, the soil should be tested for contamination due to the prior hazardous chemicals use on these properties. We note that the two borrow sites mentioned in the DEIR are already built.

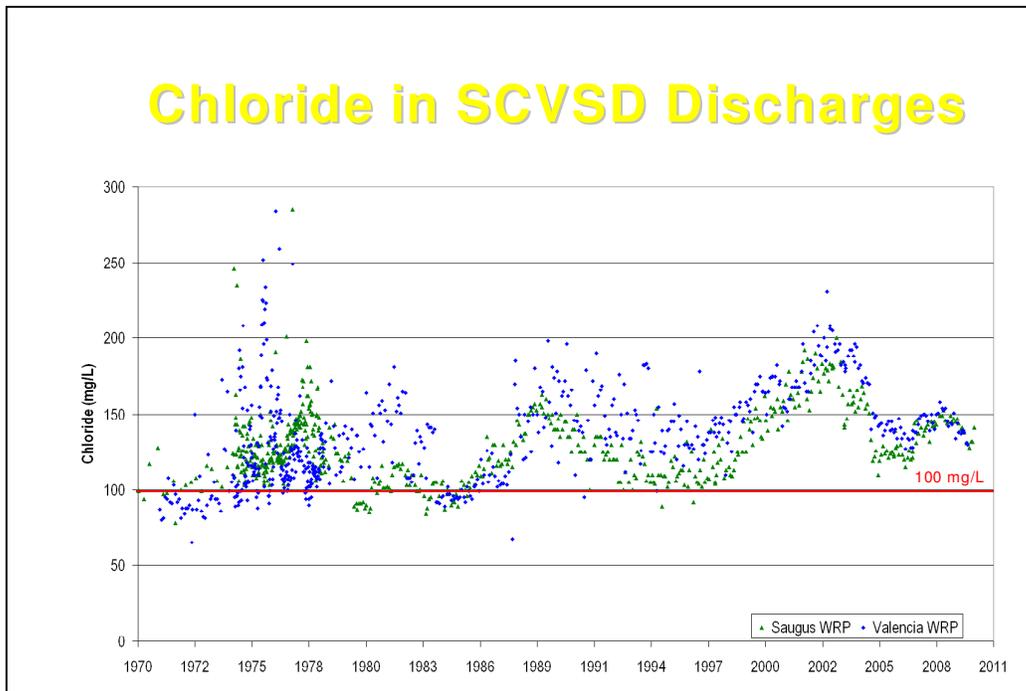
Water Quality

Chlorides

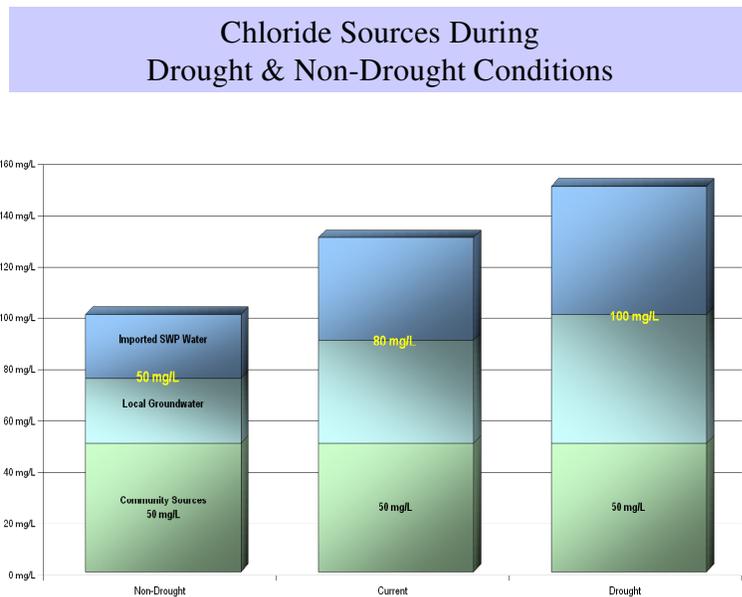
Currently the Sanitation Districts 26 and 32 in the Santa Clarita Valley do not comply with the Clean Water Act Act Total Maximum Daily Load (TMDL) effluent standard of 100 ugl of Chloride as indicated by the chart below supplied at a recent Sanitation District public hearing:

¹ http://www.usgs.gov/newsroom/article.asp?ID=2683&from=rss_home

² Appendix 4.2, FEMA letter dated Nov 9, 2009



The Santa Clarita Sanitation Districts’ failure to meet the Clean Water TMDL standard for chloride of 100mg/l in the Santa Clara River is a result of the continuing increase in the use of imported State Water Project (SWP) water as seen by the chart below, (also supplied by the Sanitation Districts).



This problem may be further aggravated by high levels of chlorides in the wells proposed to be used for these tracts. However, we cannot evaluate this potential problem because the well source is not identified, nor is any water quality data on this issue included in the DEIR. There is substantial evidence that under either scenario the chloride levels in the effluent of the treatment plant will be substantially increased.

The developer has publicly argued that he will use ground water in the area and that the ground water is low in chlorides, so additional treatment is not needed, again without anything to substantiate these assertions. However, the WSA and DEIR make no mention of AB134 chaptered in 2001 by Assemblyman Kelly that sets certain requirements on the percentage use of state water and ground water in the CLWA/Santa Clarita Water Division territory, i.e. Castaic Lake Water Agency Law, Chapter 28 of the Statutes of 1962, Section 15.1 (a)(2)(B) (d) “ During any rolling five-year period, the Agency shall use imported water for not less than 50% of the water supply demand within the area described in paragraph (1) of subdivision (a).” [the current Santa Clarita Water Agency territory].

NO analysis of existing demand within the Santa Clarita Water Co service area was made; no analysis of ability to comply with this law was disclosed. No mention of the cumulative water needs for this service area including Riverpark, Keystone and other previously approved projects. There is NO indication of what wells/pumps will supply this project and no water quality data for supply wells that would support statements that reverse osmosis is not needed.

In fact, this project must depend on a high percentage of state water as wells in this area of thin alluvial sediment already go dry in the summer months.³

Water Supply

The 2005 Urban Water Management Plan is out-dated. New requirements by the legislature were imposed by SBX7 updating disclosure requirement and water conservation goals. The UWMP for our valley is in process. The City should wait for its completion so that an accurate picture of water supply is available to the Planners and decision-makers.

In the 2nd appellate Court decision of *C-Win v. Castaic Lake Water Agency*, the Court found that Water Supply Assessments cannot be challenged independently, but only as part of the CEQA process. We therefore attach our comment letter on the CLWA, Santa Clarita Division’s Water Supply Assessment (WSA).

Overdraft of the Santa Clara River

Overdraft of the alluvial aquifer has been at issue for many years. While water agencies and other developers such as Newhall Land and Farming argued that the Santa Clara River was not in a state of overdraft, downstream users including United Water Conservation District and Ventura County remain skeptical and concerned. They withdrew their objections only after a Memorandum of Understanding⁴ was signed, agreeing to ground water monitoring in which United Conservation District would participate.

The DEIR does not give an accurate view of the full extent of ground water pumping in the Upper Santa Clara Basin. For example, the ground water pumping chart on page 4.8-25 leaves off pumping by Newhall Land and Farming, and other private users as disclosed in the 2009 Water Supply Report in the appendices. This chart makes it appear that only around 40% of the alluvial aquifer is currently utilized while in fact, the alluvial aquifer is fully utilized. (See ground

³ Appendix 4.8, Basin Yield update (2009)

⁴ MOU between the Santa Clarita Water Agencies and United Conservation District, August 2001

water production chart – all users 2009 Annual Water Report⁵). Why is this information not in the main body of the document? This information should be included.

The local well owners' association has long complained that private pumping is underestimated in ground water documents and have expressed concern that the viability of their wells may be affected by additional pumping⁶.

Further, there is considerable biological evidence that overdraft of the Santa Clara River exists, particularly in the upper reaches. The die back of vegetation away from the center of the streambed in the upper reaches is a prime indication of such overdraft as described in USGS "Sustainability of Ground Water Resources", Circular 1186⁷. **No studies exist to evaluate this impact and it is not discussed in the DEIR EIS.**

Also, no study of subsidence, another indication of groundwater overdraft has ever been conducted for the Upper Santa Clara Basin.

These omissions become even more disturbing upon reading in the EIR/EIS for the Newhall Land's Santa Clara River 404 permit (Also produced by Impact Sciences, the same consultant who wrote this EIR):

"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 proximity to each other to examine historical trends in general mineral groundwater quality throughout the basin. Based on these records of groundwater quality, wells within the Alluvium have experienced historical fluctuations in general mineral content, as indicated by electrical conductivity (EC), which correlates with fluctuations of individual constituents that contribute to EC. The historic water quality data indicates that, on a long-term basis, there has not been a notable trend and, specifically, there has not been a decline in water quality within the Alluvium.

Specific conductance within the Alluvium exhibits a westward gradient, corresponding with the direction of groundwater flow in the Alluvium. EC is lowest in the easternmost portion of the Basin, and highest in the west. Water quality in the Alluvium generally exhibits an inverse correlation with precipitation and streamflow, with a stronger correlation in the easternmost portion of the Basin, where groundwater levels fluctuate the most. Wet periods have produced substantial recharge of higher quality (low EC) water, and dry periods have resulted in declines in groundwater levels, with a corresponding increase in EC (and individual contributing constituents) in the deeper parts of the Alluvium."⁸

⁵ Appendix 4.8

⁶ See comment letters, Newhall Ranch Specific Plan and Landmark Village from Santa Clarita Valley Well Owners Association, available in LA County and CLWA files, produced upon request.

⁷ Whole document can be viewed at pubs.usgs.gov/circ/circ1186 Relevant section is "Effects of Ground water Development on Ground water Flow – Streams", see especially pg. 5 of pdf attachment

⁸ DEIR/EIS prepared by Impact Sciences for the Santa Clara River Federal 404 permit and State Fish and Game Dept. River Alteration permit, released April 2009, page 4.3-57

This information was not included in this DEIR, although these facts were well known to this DEIR consultant. Why was it omitted? This statement seems to be saying that everything is fine only as long as past precipitation trends continue, but that drought particularly causes a problem in the eastern portions of the basin. The discussion continues:

“Similar to the Alluvium, groundwater quality in the Saugus Formation is a key factor in assessing that aquifer as a municipal and agricultural water supply. As with groundwater level data, long-term Saugus groundwater quality data is not sufficiently extensive (few wells) to permit any basinwide analysis or assessment of pumping-related impacts on quality. As with the Alluvium, EC has been chosen as an indicator of overall water quality, and records have been combined to produce a long-term depiction of water quality. Water quality in the Saugus Formation has not historically exhibited the precipitation-related fluctuations seen in the Alluvium. Based on the historical record over the last 50 years, groundwater quality in the Saugus has exhibited a slight overall increase in EC. More recently, several wells within the Saugus Formation have exhibited an additional increase in EC similar to that seen in the Alluvium.”⁹

This section states that both the Saugus Aquifer and the Alluvial Aquifer are exhibiting some increase in EC indicative of ground water overdraft. There is no discussion of the well-established connectivity of the Alluvial and Saugus aquifers. Since re-charge of the Saugus aquifer depends at least in part of the alluvial aquifer, re-charge to the Saugus will be reduced by over-draft of the alluvium.

A further indication of potential problems and misinformation is provided by the two citations below from Castaic Lake Water Agency’s (CLWA) submittal to the Dept. of Health Services for permission to put water from the polluted Saugus wells back into the drinking water system after treatment.

CLWA states at page 7 of the Engineering Report Executive Summary¹⁰:

“It should also be noted that, per the 2005 Urban Water Master Plan (UWMP), given a single dry year there would be insufficient capacity from the existing and planned local, wholesale, and banked supplies to meet future needs of CLWA and the other purveyors without incorporating the restoration of Saugus 1 and 2.”

and at page 7-20 of its Engineering Report”

“It should also be noted that, as investigated in the UWMP, all alternative purveyors identified in this assessment are approaching their maximum groundwater withdrawal capacity and, therefore, may not be able to provide supplemental water to the Agency in order to meet their expected demand.”

The DEIR contains no analysis of loss of recharge due to fill and compaction of the flood plain. Instead the applicant promotes the absurd hypothesis that urban development and hardscaping increases ground water recharge. This concept runs afoul of hundreds of reports produced by agencies from the US EPA and USGS to the Los Angeles and San Gabriel Watershed Council.

⁹ *Ibid.*, page 4.3-59-60

¹⁰ Document attached

Waste Water

The DEIR states *“The proposed project includes a wastewater reclamation plant (WRP), which would be owned and operated by the City of Santa Clarita and recycle up to 395,411 gallons per day (gpd) of wastewater, including the proposed project's estimated 214,265 gpd of wastewater. The proposed WRP would be designed as a scalping plant and would not treat solids; any solids generated by the proposed project would be discharged to the existing sewer and treated at the existing Valencia WRP.”*¹¹

In order for the City to own and operate a Sanitation Plant, the City would have to receive a permit from the Regional Water Quality Control Board. Where is this permit? Has the City applied for the permit? If not when do they intend to apply? There is no indication that the City supports this proposal.

A City owned water reclamation plant will also require the formation of a Sanitation District for this project with approval by the Local Agency Formation Commission. Has an application to form a Sanitation District been made?

This project is currently not in a Sanitation District. To be served by the Valencia Treatment Plant for solids as indicated by the DEIR, the project would have to annex into the Sanitation District that requires acceptance by the Sanitation Districts and Local Agency Formation Commission approval. Since the DEIR states that solids will be removed to the Valencia Plant, the applicant apparently proposes to both create his own sanitation district and annex to the County Sanitation District as well.

No discussion of reverse osmosis for treatment to remove chlorides from the effluent is discussed. Please refer to the discussion of chlorides above.

This proposal will be extremely costly. The November 2010 staff report stated that “All costs associated with the ongoing operation and maintenance of the WRP would be paid for by future residents and property owners within the project site.”

If this is the case, the City must require:

- formation of and annexation to sanitation district prior to issuing any grading and building permits.
- Reverse osmosis of treated water to remove chlorides so that current residents will not suffer an increase in the sewer fees from costs associated with salt removal
- Bonding to ensure that the full cost of the treatment plant will be paid for by the developer

Biology

Compliance Biology did spade foot and arroyo toad surveys for this DEIR, Commissioners should question the use of this company, since this is the company that did not find them on the Riverpark project, although other biologists later had no problem identifying them. Also, the City contracted with a biologist that located arroyo toads on the CEMEX property just east of this location after another consultant working for the mine didn't find any. It is ironic that now when a housing development is before the City rather than a mine that the City has so little concern for

¹¹ DIER, pg. 4.21-1

the habitat and existents of these creatures. Such an attitude is not consistent with the City's stance on the CEMEX mine. We therefore request that the City provide independent surveys for this project and independently review the adequacy of the Western Spadefoot Toad mitigation plan.

The Fish and Game Department indicates that 17 acres of jurisdictional waters (all floodplain) will be impacted by the project requiring around 50 acres of mitigation. How will this impact be mitigated? If the City truly cares about the Santa Clara River, it must require that these impacts be addresses and mitigated in the DEIR.

The best mitigation is avoidance. The project should be removed from the floodplain.

Resource agencies including the California Fish and Game Dept, the County of Los Angeles and the Santa Monica Mountains Conservancy all decry the impacts to riparian habitat as well as loss of the wildlife corridor. These losses are significant and not mitigated. Arrundo removal, particularly is not an acceptable mitigation for impacts to riparian habitat and loss of wetlands.

Animals, like humans must have water to survive and must be able to migrate within their range to preserve their gene pool. We concur with these agencies and ask that the impacts to the floodplain riparian habitat and the wildlife corridor be fully mitigated or that only a modified alternative 1 that also protects the wildlife corridor be approved.

Metro Link Train Station

There is no commitment by the Metropolitan Transit Authority for Metrolink to build a train station in this area. The entire project is designed around this concept, but not even a single letter is disclosed in the EIR regarding this matter. Further, SCOPE submitted a request for all documents submitted by public agencies on this proposal. No correspondence from the MTA, MetroLink or any other apparent responsible agency was provided. We assert that his proposal cannot be approved without some commitment for this station. No grading should be allowed with out a guarantee of a station.

Without a verifiable commitment this project should be denied.

Traffic

Traffic impacts are considered significant due to their impact on Hwy 14 and local roads. Although a MetroLink station is proposed for this area, no on or off ramp from Hwy 14 is proposed. Instead the applicant will supposedly pay fees to CalTrans for mitigation. This seems impractical.

Page 4 of the November 2010 staff report states "The Vista Canyon applicant has also negotiated a mutually acceptable fair share mitigation agreement with Caltrans to address its impacts on SR 14. Therefore, given the above operational challenges with a new interchange and the mitigation measures already required of the Vista Canyon project, a new interchange on SR 14 was determined to not be warranted."

However, page 15 of the same staff report seems to contradict the above statement "However, because there are presently no planned and programmed improvements for SR-14, nor is there an

established funding program, the project's payment of an in-lieu fee would not fully mitigate the identified significant impacts. Therefore, mitigation is considered infeasible and the identified impacts would remain significant and unavoidable.”

The applicant claims to have an agreement with CalTrans and includes in the DEIR an unsigned and undated agreement that he would sign “upon project approval”. There is no written verification or even a letter from CalTrans indicating that they have agreed to this mitigation contract.

The City must resolve the inconsistencies in its own staff report and provide some written verification from CalTrans that such an agreement will be accepted before this project is approved.

Air Quality

We note that the air quality analysis for the preferred project is based on the presence of a transit station. Without the Metrolink transit station, the air quality analysis for this project will have to be re-circulated, as it will substantially change. The traffic analysis also assumes the proposed project's buildout of office and retail space. Yet the developer has stated that those facilities may not be feasible in the current high vacancy rate of retail or office rental space. If those uses are changed to residential, that will change the traffic, air quality and climate change sections of the DEIR, necessitating a new review of the project.

The Santa Clarita Valley is in a Federal non-attainment zone for ozone, PM10 (particulate Matter smaller than 10 microns) and PM2.5.¹²

The health effects of this pollution as described on Table 4.4-2 are as follows:

Ozone –“(a) Pulmonary function decrements and localized lung edema in humans and animals; (b) Risk to public health implied by alterations in pulmonary morphology and host defense in animals; (c) Increased mortality risk; (d) Risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (e)Vegetation damage; and (f) Property damage.”

PM10 “(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Declines in pulmonary function growth in children; and (c) Increased risk of premature death from heart or lung diseases in the elderly”.

PM2.5 Same as above.

Small particle pollution is particularly devastating, as the cilia in the lungs cannot remove it from the lungs, causing chronic debilitation.¹³

Local schools have already noted a 50% increase in the use of inhalers by school children. Parents in this area have already testified as to their concerns over increased traffic on Los Canyon road affecting the elementary school in that area. Air pollution in our valley cannot

¹² DEIR page 4.4-11

¹³ <http://www.epa.gov/apti/course422/ap7a.html>

continue to be ignored or brushed off merely by saying that some of the problem is due to air pollution from other areas. With two freeways and the vast majority of households completely auto-dependent, we must take strong action to remedy this problem.

Parks will be located next to railroad where high noise levels and air pollution from diesel fuel will affect children. Therefore a Health Risk Assessment will be required. This document should have been included in the DEIR.

We note that SCAQMD's December 3rd letter states that the mitigation for this project does *not* include all feasible mitigation to reduce air pollutants. As air pollution is considered and unavoidable significant impact, the City must include all feasible mitigation to reduce this impact. We ask that the City include these as well as the suggested mitigation for Greenhouse Gas Reduction provided by CAPCOA and the Office of the Attorney General. (Attached).

Consistency

The Consistency Study provided in the Appendix 4.7 is inadequate. Often when the project is inconsistent with a current goal or policy, the analysis states that the policy is not applicable to this project. For instance:

Policy 5.3: Maintain adequate levels of service on roadways and at intersection to reduce emissions from delays.

Not Applicable: This Policy is a responsibility of and directed to the City of Santa Clarita. This Policy is not applicable to the proposed project.

This project creates significant impacts to local intersections. It is not consistent with the current general plan policy for levels of service.

Or, it merely states that it is consistent when it obviously is not

Policy 3.3: Identify and protect areas of significant ecological value, including, but not limited to, significant ecological habitats such as the wildlife corridor between the Santa Susana Mountains and the San Gabriel Mountains and preserve and enhance existing Significant Ecological Areas (SEAs).

Consistent: The project EIR includes mitigation measures in Section 4.6, Biological Resources, that would minimize or mitigate biological impacts of the project and would result in the protection and enhancement of the Santa Clara River SEA on the project site.

The project is not consistent with this policy as noted by the letter from the Santa Monica Mountains Conservancy dated Nov. 19th 2010, the letter from the County of Los Angeles dated Dec 3rd, and the letter from the California Dept. of Fish and Game dated Dec.13th, 2010.

It is not enough to merely claim that a project is consistent with the goals and policies of the General Plan. It has to in fact BE consistent.

Conclusion

The DEIR concludes that Significant Unavoidable Impacts with implementation of the project

would occur to Traffic, Air Quality, Noise and Solid Waste. We believe that significant unavoidable impacts should also be indicated for biology, due to the loss of the floodplain riparian resources, destruction of an area designated as Significant Ecological Area and the wildlife corridor as well as water quality due to the unmitigated increase in chloride level releases to the Santa Clara River.

The Planning Commission is under no obligation to approve a project requesting a Plan Amendment change and one that includes so many significant unavoidable impacts. We therefore urge the Planning Commission to deny this project because it provides no guarantee of the promised public benefits while being extremely destructive to the environment.

Sincerely,



Lynne Plambeck
President

CC: LA LAFCO
LA County Sanitation Districts
LA Regional Water Quality Board

Attachments:

1. LA Regional Water Quality Control Board Resolution on Hydromodification
2. New York Times article on the effect of levees on the Mississippi River
3. SCOPE letter to CLWA on Vista Ranch Water Supply Assessment
4. USGS Circular 1186 regarding Ground Water overdraft
5. CLWA Engineering Report, 2009 for permission to use treated water from the polluted Saugus wells as a drinking water source.
6. CAPCOA and Attorney General's (see pages 2-4) list of feasible greenhouse gas mitigation