Final Environmental Impact Report
SCH No. 2013091023

Los Angeles Groundwater Replenishment Project

Prepared by:

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October 2016

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CHAPTER 1
INTRODUCTION

This Environmental Impact Report (EIR) has been prepared by the City of Los Angeles (City), as represented by the Los Angeles Department of Water and Power (LADWP) and the Los Angeles Department of Public Works Bureau of Sanitation (LASAN), to evaluate potential environmental effects that would result from development of the proposed Los Angeles Groundwater Replenishment (LAGWR) Project (Proposed Project or Project). This EIR has been prepared in conformance with the California Environmental Quality Act of 1970 (CEQA) statutes (Cal. Pub. Res. Code, Section 21000 et. seq., as amended) and its implementing guidelines (Cal. Code Regs., Title 14, Section 15000 et. seq., 2016). Several public agencies would have a key role in the approval and/or implementation of the Proposed Project. As the public agencies responsible for water resources in the City of Los Angeles, LADWP and LASAN are working jointly to plan, design, implement, and operate the Project. LADWP, as the supplier of potable water to the City of Los Angeles, would maintain final use and control of the purified water produced under the Project and would provide funding to support Project implementation and operations. As such, LADWP is identified as the lead agency for the Proposed Project under CEQA. This Final EIR contains comments and responses to comments received on the Draft EIR, which was circulated for public review from May 12, 2016, to July 11, 2016. Revisions and clarifications to the Final EIR made in response to comments received on the Draft EIR are listed in Chapter 2, Clarifications and Modifications. The comments and responses to comments are presented in Chapter 3, Response to Comments on the Draft EIR.

1.1 Proposed Project Background

In accordance with the Administrative Code of the City of Los Angeles, LADWP is authorized and obligated to supply potable water to meet the needs of the City's residents, businesses, and other functions. LADWP has traditionally relied on four primary sources to provide for this need, including imported water under the City's water rights in the Mono Basin and Owens River watershed in the Eastern Sierra, which is conveyed to the City via the Los Angeles Aqueduct system; purchases from the Metropolitan Water District of Southern California (MWD), which are conveyed from the Colorado River via the Colorado River Aqueduct and from the State Water Project via the California Aqueduct; local groundwater supplied via wells located throughout the City; and recycled water, which is currently used for non-potable reuse (NPR) functions, such as large-scale irrigation.

Historically, during normal precipitation years, imported water from both LADWP-controlled sources and MWD purchases has accounted for nearly 90 percent of annual supply, with MWD purchases accounting for over 50 percent in recent years. Although imported water supplies have served the City for over a century, numerous factors, including frequent and prolonged droughts, increased populations served by the imported resources, diversions of water to meet environmental commitments, and judicial decisions limiting importation, have converged to threaten the long-term reliability of imported supplies. In addition, dependence on imported water is costly, less environmentally sustainable, and provides less security during emergency circumstances, such as an earthquake along the San Andreas Fault, when imported supplies may become unavailable for extended periods.

In response to these challenges related to traditional imported water supplies, the City has embarked upon an aggressive effort to maintain reliable and sustainable sources of water. Long-term strategies outlined in the 2010 Los Angeles Urban Water Management Plan (UWMP) intended to "meet the City's water needs while maximizing local resources and minimizing the need to import water" include increasing water conservation, increasing water recycling, enhancing stormwater capture, and accelerating groundwater cleanup. These strategies are not alternative means to achieve local water supply goals but are complementary and mutually inclusive.

Consistent with the Los Angeles Mayor's 2014 Executive Directive No. 5 (Emergency Drought Response) and 2015 Sustainable City Plan, these strategies will help achieve the goals of reducing per capita water use by 25 percent by 2035, decreasing the purchase of imported water supplies by 50 percent by 2025, and sourcing 50 percent of the City's water from local supplies by 2035.

In relation to recycled water, the UWMP established a goal to increase the use of recycled water within the City to 59,000 acre-feet per year (AFY) by 2035. As an implementing plan to achieve this goal, the 2012 Recycled Water Master Plan (RWMP), prepared jointly by LADWP and LASAN, determined based on the available capacity of recycled water treatment that 30,000 AFY should be dedicated to groundwater replenishment (GWR) to help enhance the City's ability to use groundwater from the San Fernando Groundwater Basin (SFB) aquifer. The 2012 Groundwater Replenishment Master Plan (GWRMP) further evaluated the facility requirements and siting factors related to achieving the GWR goal identified in the RWMP.

The Proposed Project presented in this EIR is an outcome of this planning process and reflects policies to reduce reliance on imported water, increase the use of recycled water, and replenish the groundwater basin in order to maintain a sustainable, safe, and reliable supply of potable water to meet the needs of the City of Los Angeles.

1.2 Summary of the Proposed Project

To maintain the reliability of the City of Los Angeles' potable water supply and reduce dependence on imported sources of water, the City proposes to implement the Proposed Project to replenish the SFB with up to 30,000 AFY of purified recycled water[1] (purified water) from the Donald C. Tillman Water Reclamation Plant (DCTWRP). Achieving this replenishment goal would entail operating DCTWRP at the plant's full capacity to treat up to 80 million gallons per day (mgd) of wastewater.

The Project would consist of three basic elements: 1) *treatment* would entail the construction and operation of new Advanced Water Purification Facilities (AWPF) and related facilities that would provide additional levels of treatment of recycled water generated by the existing DCTWRP facilities to produce purified water; 2) *conveyance* would entail the use of existing and newly constructed pipelines to transport the purified water from the AWPF to existing spreading grounds; and 3) *replenishment* would entail the spreading of the purified water at the existing spreading grounds so that it would percolate into the SFB.

[1] "Purified recycled water" is wastewater that has undergone multiple treatment steps, beyond standard wastewater treatment. To create purified recycled water, highly treated wastewater (known as recycled water) is further treated through advanced water treatment processes, such as ozonation, biologically activated carbon, multiple barrier filtration (microfiltration and reverse osmosis) and/or advanced oxidation processes.

Several public agencies would have a key role in the approval and/or implementation of the Proposed Project. As previously discussed, LADWP and LASAN are working jointly to plan, design, implement, and operate the Project. LADWP, as the supplier of potable water to the City of Los Angeles, would maintain final use and control of the purified water produced at DCTWRP under the Project and would provide funding to support Project implementation and operations. As such, LADWP is serving as the lead agency under CEQA for the Project. The City of Los Angeles Board of Water and Power Commissioners, in order to approve the Proposed Project or alternative to the Project, must certify that the Project EIR was prepared in accordance with CEQA and other applicable codes and guidelines, and it must take into account the conclusions contained in the EIR when considering approval of the Project. LASAN, which is the operator of DCTWRP, also plays an integral role in the Proposed Project, since it would own and operate the AWPF and related facilities to produce purified water. Therefore, LASAN, as part of the City of Los Angeles Department of Public Works, is a responsible agency under CEQA for the Project. The City of Los Angeles Board of Public Works must also take into account the conclusions contained in the EIR when considering various permits and approval of a Memorandum of Agreement between LADWP and LASAN for the design, construction, operation, maintenance, and reimbursements for the AWPF and related facilities at DCTWRP. The Los Angeles County Department of Public Works is also a CEQA responsible agency because it owns and operates Hansen Spreading Grounds (HSG) and Pacoima Spreading Grounds (PSG) and therefore must approve construction at the spreading grounds and accept the purified water for groundwater replenishment at the spreading grounds. The Los Angeles County Department of Public Works would continue to own and operate HSG and PSG with implementation of the proposed project. It must also take into account the EIR when considering approval of a Memorandum of Understanding for operations and maintenance related to spreading of purified water at HSG and PSG. In addition, because DCTWRP is located on land within the Sepulveda Dam Flood Control Basin (Sepulveda Basin) that is leased from the United States Army Corps of Engineers (Corps), the Corps is a federal agency that must approve the construction and operation of those portions of the Project located within the Basin. The Corps may utilize the CEQA-Plus EIR document (see below) to consider this approval in relation to NEPA-required environmental actions and issues.

1.3 CEQA Environmental Process

CEQA requires preparation of an EIR when there is substantial evidence supporting a fair argument that a proposed project may have a significant effect on the environment. The purpose of an EIR is to provide decision makers, public agencies, and the general public with an objective and informational document that fully discloses the environmental effects of a proposed project. The EIR process is intended to facilitate the evaluation of potentially significant direct, indirect, and cumulative environmental impacts of a proposed project, and to identify feasible mitigation measures and alternatives that might reduce or avoid the project's significant effects. In addition, CEQA specifically requires that an EIR identify those adverse impacts determined to remain significant after the application of mitigation measures.

1.3.1 Notice of Preparation and Initial Study

As the lead agency for the Proposed Project, LADWP must complete an environmental review to determine if implementation of the Project would result in significant adverse environmental impacts. To fulfill the purpose of CEQA, an Initial Study was prepared to assist in making that determination.

In accordance with the CEQA Guidelines, a Notice of Preparation (NOP) of an EIR, including an Initial Study of potential environmental impacts, was prepared and distributed on September 6, 2013, to public agencies, interested organizations, and the general public for a 46-day review period. The purpose of the NOP was to provide notification that LADWP planned to prepare an EIR and to solicit input on the scope and content of the EIR. The NOP was distributed to approximately 47 agencies, organizations, and other parties.

Three public meetings were held during the public review period on September 25, October 3, and October 12, 2013. The purpose of the meetings was to seek input from public agencies, organizations, and the general public regarding the environmental issues and concerns related to implementation of the Proposed Project.

A total of 15 written comments were received during the NOP scoping period, and they are included in Appendix A to the Draft EIR. Based on the nature and scope of the Proposed Project, the evaluation contained in the Initial Study, and the comments received from agencies and members of the public during review of the NOP scoping process, resource topics that have the potential to involve significant adverse environmental impacts were evaluated in the Draft EIR.

1.3.2 Notice of Availability and Draft EIR

The Draft EIR was circulated for a 60-day public review and comment period starting on May 12, 2016, and concluding on July 11, 2016. The public review period was conducted pursuant to CEQA and its implementing guidelines. The purpose of the public review period was to provide interested public agencies, organizations, and individuals the opportunity to comment on the contents and accuracy of the document. The Draft EIR and the Notice of Completion were distributed to the California Office of Planning and Research, State Clearinghouse. A Notice of Availability (NOA) was distributed to approximately 47 relevant legislators, agencies, and community stakeholders, and approximately 450 individuals. The NOA informed them of where the Draft EIR could be reviewed and how to comment. Copies of the Draft EIR were made available to the public for review at three local libraries, as well as LADWP Headquarters. A copy of the document was also posted online.

A public meeting was held during the Draft EIR public review period to solicit comments from interested parties on the content of the Draft EIR. Information regarding the public meeting was included in the NOA, which was widely distributed, as described above. The meeting was held on June 14, 2016, at the Sepulveda Garden Center in the Encino community. Approximately 17 individuals attended the Draft EIR public meeting.

1.3.3 Final EIR

This Final EIR contains comments and responses to comments received on the Draft EIR. Revisions and clarifications made in response to comments received on the Draft EIR are listed in Chapter 2, Clarifications and Modifications. The comments and responses to comments are presented in Chapter 3, Response to Comments on the Draft EIR.

Prior to approval of the Proposed Project or an alternative to the Proposed Project, the City of Los Angeles Board of Water and Power Commissioners, as the lead agency for the Project, is required to certify that this EIR has been completed in accordance with CEQA, that the EIR reflects the independent judgment of the lead agency, and that the information in this EIR has been considered during the review of the Project. CEQA also requires the Board of Water and

Power Commissioners to adopt "findings" with respect to each significant environmental effect identified in the EIR (Cal. Pub. Res. Code Section 21081; Cal. Code Regs., Title 14, Section 15091). For each significant effect, CEQA requires the approving agency to make one or more of the following findings:

- Changes or alterations to the Project have been made to avoid or substantially lessen significant impacts identified in the Final EIR.

- The responsibility to carry out such changes or alterations is under the jurisdiction of another agency and have been adopted by such other agency or can and should be adopted by such other agency.

- Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR.

If the Los Angeles Board of Water and Power Commissioners concludes that the Proposed Project or an alternative to the Proposed Project would result in significant effects that have been identified in this EIR but are not substantially lessened or avoided by feasible mitigation measures and/or alternatives, it must adopt a "statement of overriding considerations" in order to approve the Project (Cal Pub. Res. Code Section 21081 [b]). Such statements are intended under CEQA to provide a means by which the lead agency balances, in writing, the benefits of the Proposed Project with the significant and unavoidable environmental impacts. Where the lead agency concludes that the economic, legal, social, technological, or other benefits outweigh the unavoidable environmental impacts, the lead agency may find such impacts "acceptable" and approve the Proposed Project.

In addition, the Los Angeles Board of Water and Power Commissioners must also adopt a Mitigation Monitoring and Reporting Program describing the changes that were incorporated into the Project or made a condition of approval in order to mitigate or avoid significant effects on the environment (Cal. Pub. Res. Code Section 21081.6). The Mitigation Monitoring and Reporting Program is adopted at the time of Project approval and is designed to ensure compliance during Project implementation. Upon approval of the Proposed Project or an alternative to the Proposed Project, the lead agency will be responsible for implementation of the Mitigation Monitoring and Reporting Program.

1.4 Organization of the Final EIR

This Final EIR is organized as follows:

Chapter 1 (Introduction) provides a summary of the Proposed Project, an overview of the CEQA environmental review process, and a description of the organization of the Final EIR.

Chapter 2 (Clarifications and Modifications) provides clarifications and minor modifications that were made to the text of the Draft EIR. Clarifications and modifications reflect changes as a result of a comment made by an agency or individual during the public review period, and do not constitute significant new information and do not change any of the conclusions of the document.

Chapter 3 (Response to Comments on the Draft EIR) provides a list of agencies, organizations, and individuals commenting on the Draft EIR, copies of the written and oral

comments received during the Draft EIR public comment period, and the lead agency responses to those comments.

CHAPTER 2
CLARIFICATIONS AND MODIFICATIONS

The following clarifications and minor modifications are intended to update the Draft EIR in response to the comments received during the public review period. The clarifications and modifications are incorporated by reference into the Draft EIR. This Final EIR, along with the Draft EIR, constitute a single document that encompasses the final impact analysis for the Proposed Project. None of these revisions made to the Draft EIR constitute significant new information, change any of the conclusions of the document, or have resulted in new significant impacts or mitigation measures, nor has the severity of a previously identified impact increased.

The changes to the Draft EIR are listed by page number, with reference to the applicable comment number. Text which has been removed is shown with a ~~strikethrough~~ line, while text that has been added is shown underlined.

Page — Clarification/Revision

ES-7 *In response to Comment 4-10, the ownership of HSG has been clarified. As such, the third sentence in the last paragraph on this page is modified as follows*:

HSG is owned and operated by the Los Angeles County Department of Public Works (LACDPW).

In response to Comment 4-11, the number and types of basins at HSG has been clarified. As such, the last complete sentence on this page is modified as follows:

It occupies 156 gross acres and includes six ~~eight~~ medium spreading basins, two small desilting basins, and one small distribution basin occupying 117 wetted acres.

ES-8 *In response to Comment 4-10, the ownership of PSG has been clarified. As such, the fourth sentence in the first paragraph on this page is modified as follows*:

PSG is owned and operated by LACDPW.

In response to Comment 4-9, the estimated maximum storage value for PSG has been clarified. As such, the third sentence in the second paragraph on this page is modified as follows:

It presently has an estimated maximum storage volume of 143 ~~173~~ mg, an intake capacity of 388 mgd, and an average percolation rate of approximately 42 mgd.

1-3 *In response to Comment 4-12, the use of the spreading grounds has been clarified. As such, the first complete sentence on this page is modified as follows*:

The Los Angeles County Department of Public Works is also a CEQA responsible agency because it owns and operates Hansen Spreading Grounds (HSG) and Pacoima Spreading Grounds (PSG) and therefore must approve construction at the

spreading grounds and accept the purified water ~~the use of the spreading grounds by LADWP~~ for groundwater replenishment at the spreading grounds.

2-9 *In response to Comment 4-10, the ownership of HSG has been clarified. As such, the third sentence in the second paragraph on this page is modified as follows*:

HSG is owned and operated by the Los Angeles County Department of Public Works (LACDPW).

In response to Comment 4-11, the number and types of basins at HSG has been clarified. As such, the second sentence in the third paragraph on this page is modified as follows:

It occupies 156 gross acres and includes six ~~eight~~ medium spreading basins, two small desilting basins, and one small distribution basin occupying 117 wetted acres.

In response to Comment 4-10, the ownership of PSG has been clarified. As such, the fourth sentence in the fourth paragraph on this page is modified as follows:

PSG is owned and operated by LACDPW.

In response to Comment 4-9, the estimated maximum storage value for PSG has been clarified. As such, the third sentence in the last paragraph on this page is modified as follows:

It presently has an estimated maximum storage volume of 143 ~~173~~ mg, an intake capacity of 388 mgd, and an average percolation rate of approximately 42 mgd.

2-36 *In response to Comment 4-5, the permitting requirements related to connections to Los Angeles County Flood Control facilities has been added. As such, the following bullet has been added under the heading, Los Angeles County Department of Public Works:*

Los Angeles County Department of Public Works

- Approval of a Memorandum of Understanding for the operations and maintenance for spreading of purified water at HSG and PSG
- Approval of a Memorandum of Understanding for permanent easements for the new facilities constructed at HSG and PSG
- Municipal Separate Storm Sewer System permit
- Flood Permits from the Land Development Division for connections to Los Angeles County Flood Control District facilities

3.9-9 *In response to Comment 4-17, the frequency of basin maintenance activities has been clarified. As such, the first sentence on this page is modified as follows:*

LACDPW has noted that when the spreading grounds are used for stormwater spreading, the percolation rates can significantly decline, particularly in high runoff years. LACDPW conducts basin maintenance activities typically following every storm ~~high runoff~~ season~~s~~.

3.9-12 *In response to Comment 4-19, the groundwater depth at HSG been clarified. As such, the first paragraph on this page is modified as follows:*

Groundwater levels in the SFB vary seasonally and by locality, with levels in the western section of the SFB at approximately 50 feet below ground surface (bgs) and levels in the eastern section at between 200 and 500 feet bgs. Although variable and depending on the amount of recharge activities at ~~At~~ HSG, it is estimated that groundwater most likely would be encountered at approximately 200 feet bgs. Most production wells in the area are completed in the upper Saugus Formation. Production rates for these wells range from 800 to 1,500 gpm.

3.9-25 *In response to Comments 4-22 and 4-24, the facilities from which LACDPW releases storm flows and the use of the spreading grounds have been clarified. As such, the third paragraph on this page is modified as follows:*

Recharge of purified recycled water to HSG and PSG would not occur during times of the year ~~(primarily winter months)~~ when LACDPW is releasing ~~storm~~ flows from ~~Hansen,~~ Big Tujunga and Pacoima Dams to recharge the basins. During dry years it is projected that HSG and PSG would be unavailable for recharge 10 days and 5 days, respectively, and during wet years, HSG and PSG would be unavailable for 70 and 30 days, respectively. Also, recharge would not occur during periods when LACDPW is performing basin maintenance. A Memorandum of Understanding would be established between LADWP and LACDPW to establish these safe operating procedures to maximize stormwater recharge at HSG and PSG and accept the purified recycled water ~~allow LADWP~~ to safely recharge ~~with purified recycled water when~~ the basins when they are available. No flooding impacts are anticipated.

3.10-1 *In response to Comment 4-11, the number and types of basins at HSG has been clarified. As such, the last sentence in the third paragraph on this page is modified as follows:*

The new 200-foot pipeline, outlet structure, and gate valve would be located within the boundaries of the HSG property, which occupies 156 gross acres and includes six ~~eight~~ medium spreading basins, two small desilting basins, and one small distribution basin occupying 117 wetted acres.

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CHAPTER 3
RESPONSE TO COMMENTS ON THE DRAFT EIR

The Draft EIR was distributed for public review on May 12, 2016, through July 11, 2016, pursuant to CEQA Guidelines Section 15105. A total of 14 comment letters, comment cards, and emails were received. According to CEQA Guidelines Section 15088(a), "the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response." This chapter provides responses to written and oral comments received during the public review period, including comments received during the Draft EIR public meeting, held on June 14, 2016.

This chapter is organized into two parts: 1) responses to written comments received during the public review period, and 2) responses to oral comments received at the Draft EIR public meeting. Written responses are presented for all comment letters received during the public review period, starting with comment letters from agencies, followed by comment letters from organizations, and then comment letters from individuals. The responses to the oral comments received at the Draft EIR public meeting are provided at the end of this chapter.

Each letter has been assigned a number code, and individual comments in each letter have also been coded to facilitate responses. For example, the letter from the State Water Resources Control Board is identified at Comment Letter 1, with comments noted as 1-1, 1-2, 1-3, etc. Copies of each comment letter are provided prior to each set of responses. Comments that present opinions about the project or that discuss issues not related to the substance of the environmental analysis in the Draft EIR are noted but, in accordance with CEQA, did not receive a detailed response. In response to some of the comments received, the text of the EIR has been revised. Refer to Chapter 2, Clarifications and Modifications, for a list of these changes.

3.1 Responses to Written Comments Received

Table 3-1
List of Comment Letters Received on Draft EIR

Letter No.	Agency/Organization/Individual	Date of Letter	Page # of Response
Agencies			
1	State Water Resources Control Board *Signed: Trevor Cleak*	June 8, 2016	3-12
2	California Department of Transportation *Signed: Dianna Watson*	July 11, 2016	3-15
3	State of California Governor's Office of Planning and Research, State Clearinghouse *Signed: Scott Morgan*	July 12, 2016	3-24
4	Los Angeles County Department of Public Works *Signed: Toan Duong*	July 26, 2016	3-31
Organizations			
5	Homeowners of Encino *Signed: Gerald A. Silver*	June 13, 2016	3-40
6	Los Angeles Waterkeeper 1 *Signed: Arthur Pugsley*	June 14, 2016	3-46

Table 3-1
List of Comment Letters Received on Draft EIR

Letter No.	Agency/Organization/Individual	Date of Letter	Page # of Response
7	Los Angeles Waterkeeper 2 *Signed: Arthur Pugsley*	July 6, 2016	3-50
8	San Fernando Valley Audubon Society *Signed: Mark B. Osokow and David A. Weeshoff*	July 11, 2016	3-60
Individuals			
9	Williams, Dr. Tom (1)	June 13, 2016	3-67
10	Ayala, Olga	June 14, 2016	3-69
11	Rougé, Robert A.	June 14, 2016	3-71
12	Williams, Dr. Tom (2)	June 14, 2016	3-73
13	Amsden, Liz	June 21, 2016	3-79
14	Williams, Dr. Tom (3)	July 11, 2016	3-82

CALIFORNIA Water Boards

EDMUND G. BROWN JR. GOVERNOR

MATTHEW RODRIQUEZ SECRETARY FOR ENVIRONMENTAL PROTECTION

State Water Resources Control Board

JUN 08 2016

Nadia Parker
Los Angeles Department of Water and Power
111 N. Hope Street, Room 1044
Los Angeles, CA 90012

Dear Ms. Nadia Parker:

ENVIRONMENTAL IMPACT REPORT (EIR) FOR LOS ANGELES DEPARTMENT OF WATER AND POWER (CITY); LOS ANGLES GROUNDWATER REPLENISHMENT PROJECT (PROJECT); LOS ANGELES COUNTY; STATE CLEARINGHOUSE NO. 2013091023

We understand that the City will be pursuing Clean Water State Revolving Fund (CWSRF) financing for this Project. As a funding agency and a state agency with jurisdiction by law to preserve, enhance, and restore the quality of California's water resources, the State Water Resources Control Board (State Water Board) is providing the following information on the EIR to be prepared for the Project.

The State Water Board, Division of Financial Assistance, is responsible for administering the CWSRF Program. The primary purpose for the CWSRF Program is to implement the Clean Water Act and various state laws by providing financial assistance for wastewater treatment facilities necessary to prevent water pollution, recycle water, correct nonpoint source and storm drainage pollution problems, provide for estuary enhancement, and thereby protect and promote health, safety and welfare of the inhabitants of the state. The CWSRF Program provides low-interest funding equal to one-half of the most recent State General Obligation Bond Rates with a 30-year term. Applications are accepted and processed continuously. Please refer to the State Water Board's CWSRF website at: www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/index.shtml. 1-1

The CWSRF Program is partially funded by the United States Environmental Protection Agency and requires additional "CEQA-Plus" environmental documentation and review. Three enclosures are included that further explain the CWSRF Program environmental review process and the additional federal requirements. For the complete environmental application package please visit: http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml. The State Water Board is required to consult directly with agencies responsible for implementing federal environmental laws and regulations. Any environmental issues raised by federal agencies or their representatives will need to be resolved prior to State Water Board approval of a CWSRF financing commitment for the proposed Project. For further information on the CWSRF Program, please contact Mr. Ahmad Kashkoli, at (916) 341-5855.

It is important to note that prior to a CWSRF financing commitment, projects are subject to provisions of the Federal Endangered Species Act (ESA), and must obtain Section 7 clearance from the United States Department of the Interior, Fish and Wildlife Service (USFWS), and/or the United States Department of Commerce National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS) for any potential effects to special-status species.

Please be advised that the State Water Board will consult with the USFWS, and/or the NMFS regarding all federal special-status species that the Project has the potential to impact if the Project is to be financed by the CWSRF Program. The City will need to identify whether the Project will involve any direct effects from construction activities, or indirect effects such as growth inducement, that may affect federally listed threatened, endangered, or candidate species that are known, or have a potential to occur in the Project site, in the surrounding areas, or in the service area, and to identify applicable conservation measures to reduce such effects.

In addition, CWSRF projects must comply with federal laws pertaining to cultural resources, specifically Section 106 of the National Historic Preservation Act (Section 106). The State Water Board has responsibility for ensuring compliance with Section 106, and must consult directly with the California State Historic Preservation Officer (SHPO). SHPO consultation is initiated when sufficient information is provided by the CWSRF applicant. If the City decides to pursue CWSRF financing, please retain a consultant that meets the Secretary of the Interior's Professional Qualifications Standards (http://www.nps.gov/history/local-law/arch_stnds_9.htm) to prepare a Section 106 compliance report.

1-1 Cont'd

Note that the City will need to identify the Area of Potential Effects (APE), including construction and staging areas, and the depth of any excavation. The APE is three-dimensional and includes all areas that may be affected by the Project. The APE includes the surface area and extends below ground to the depth of any Project excavations. The records search request should extend to a ½-mile beyond Project APE. The appropriate area varies for different projects but should be drawn large enough to provide information on what types of sites may exist in the vicinity.

Other federal environmental requirements pertinent to the Project under the CWSRF Program include the following (for a complete list of all federal requirements, please visit: http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/docs/forms/application_environmental_package.pdf):

A. An alternative analysis discussing environmental impacts of the Project in either the CEQA document (Negative Declaration, Mitigated Negative Declaration or Environmental Impact Report) or in a separate report.

B. A public hearing or meeting must be held for all projects except for those with little or no environmental impacts.

C. Compliance with the Federal Clean Air Act: (a) Provide air quality studies that may have been done for the Project; and (b) if the Project is in a nonattainment area or attainment area subject to a maintenance plan; (i) provide a summary of the estimated emissions (in tons per year) that are expected from both the construction and operation of the Project for each federal criteria pollutant in a nonattainment or maintenance area, and indicate if the nonattainment designation is moderate, serious, or severe (if applicable); (ii) if emissions are above the federal de minimis levels, but the Project is sized to meet only the needs of current population projections that are used in the approved State Implementation Plan for air quality, quantitatively indicate how the proposed capacity increase was calculated using population projections.

D. Compliance with the Coastal Zone Management Act: Identify whether the Project is within a coastal zone and the status of any coordination with the California Coastal Commission.

E. Protection of Wetlands: Identify any portion of the proposed Project area that should be evaluated for wetlands or United States waters delineation by the United States Army Corps of Engineers (USACE), or requires a permit from the USACE, and identify the status of coordination with the USACE.

F. Compliance with the Farmland Protection Policy Act: Identify whether the Project will result in the conversion of farmland. State the status of farmland (Prime, Unique, or Local and Statewide Importance) in the Project area and determine if this area is under a Williamson Act Contract.

G. Compliance with the Migratory Bird Treaty Act: List any birds protected under this act that may be impacted by the Project and identify conservation measures to minimize impacts.

H. Compliance with the Flood Plain Management Act: Identify whether or not the Project is in a Flood Management Zone and include a copy of the Federal Emergency Management Agency flood zone maps for the area.

I. Compliance with the Wild and Scenic Rivers Act: Identify whether or not any Wild and Scenic Rivers would be potentially impacted by the Project and include conservation measures to minimize such impacts.

1-1 Cont'd

Following is the specific comment on the City's draft EIR:

1. There is no reference to compliance with the Assembly Bill (AB) 52 requirements. The District should clarify if any consultations were conducted per AB 52.

1-2

Please provide us with the following documents applicable to the proposed Project following the City's California Environmental Quality Act (CEQA) process: (1) one copy of the draft and final EIR, (2) the resolution certifying the EIR and making CEQA findings, (3) all comments received during the review period and the City's response to those comments, (4) the adopted Mitigation Monitoring and Reporting Program (MMRP), and (5) the Notice of Determination filed with the Los Angeles County Clerk and the Governor's Office of Planning and Research, State Clearinghouse. In addition, we would appreciate notices of any hearings or meetings held regarding environmental review of any projects to be funded by the State Water Board.

1-3

Thank you for the opportunity to review the City's draft EIR. If you have any questions or concerns, please feel free to contact me at (916) 319-8574, or by email at Trevor.Cleak@waterboards.ca.gov, or contact Ahmad Kashkoli at (916) 341-5855, or by email at Ahmad.Kashkoli@waterboards.ca.gov. 1-3 Cont'd

Sincerely,

Trevor Cleak
Environmental Scientist

Enclosures (3) 1-4

1. Clean Water State Revolving Fund Environmental Review Requirements
2. Quick Reference Guide to CEQA Requirements for State Revolving Fund Loans
3. Basic Criteria for Cultural Resources Reports

cc: State Clearinghouse
(Re: SCH# 2013091023)
P.O. Box 3044
Sacramento, CA 95812-3044

CLEAN WATER STATE REVOLVING FUND

California Environmental Quality Act Requirements

State Water Resources Control Board
Division of Financial Assistance

The State Water Resources Control Board (State Water Board), Division of Financial Assistance, administers the Clean Water State Revolving Fund (CWSRF) Program. The CWSRF Program is partially funded by grants from the United States Environmental Protection Agency. All applicants seeking CWSRF financing must comply with the California Environmental Quality Act (CEQA), and provide sufficient information so that the State Water Board can document compliance with federal environmental laws. The "Environmental Package" provides the forms and instructions needed to complete the environmental review requirements for CWSRF Program financing. It is available at: *http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml*

LEAD AGENCY

The applicant is usually the "Lead Agency" and must prepare and circulate an environmental document before approving a project. Only a public agency, such as a local, regional or state government, may be the "Lead Agency" under CEQA. If a project will be completed by a non-governmental organization, "Lead Agency" responsibility goes to the first public agency providing discretionary approval for the project.

RESPONSIBLE AGENCY

The State Water Board is generally a "Responsible Agency" under CEQA. As a "Responsible Agency," the State Water Board must make findings based on information provided by the "Lead Agency" before financing a project.

ENVIRONMENTAL REVIEW

The State Water Board's environmental review of the project's compliance with both CEQA and federal cross-cutting regulations must be completed before a project can be financed by the CWSRF Program.

DOCUMENT REVIEW

Applicants are encouraged to consult with State Water Board staff early during preparation of CEQA document if considering CWSRF financing. Applicants shall also send their environmental documents to the State Water Board, Environmental Review Unit during the CEQA public review period. This way, any environmental concerns can be addressed early in the process.

REQUIRED DOCUMENTS

The Environmental Review Unit requires the documents listed below to make findings and complete its environmental review. Once the State Water Board receives all the required documents and makes its own findings, the environmental review for the project will be complete.

- ✓ Draft and Final Environmental Documents: Environmental Impact Report, Negative Declaration, and Mitigated Negative Declaration as appropriate to the project
- ✓ Resolution adopting/certifying the environmental document, making CEQA findings, and approving the project
- ✓ All comments received during the public review period and the "Lead Agency's" responses to those comments
- ✓ Adopted Mitigation Monitoring and Reporting Plan, if applicable
- ✓ Date-stamped copy of the Notice of Determination or Notice of Exemption filed with the County Clerk(s) and the Governor's Office of Planning and Research
- ✓ CWSRF Evaluation Form for Environmental Review and Federal Coordination with supporting documents

1-4

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to keep California's **water clean**.
CLEAN WATER STATE REVOLVING FUND

Contact Information: For more information related to the CWSRF Program environmental review process and requirements, please contact your State Water Board Project Manager or Mr. Ahmad Kashkoli at 916-341-5855 or Ahmad.Kashkoli@waterboards.ca.gov

Water Boards
waterboards.ca.gov

REVISED FEB. 2014

CLEAN WATER STATE REVOLVING FUND

Basic Criteria for Cultural Resources Report Preparation

State Water Resources Control Board
Division of Financial Assistance

For Section 106 Consultation with the State Historic Preservation Officer (SHPO) under the National Historic Preservation Act

CULTURAL RESOURCES REPORT

The Cultural Resources Report must be prepared by a qualified researcher that meets the Secretary of the Interior's Professional Qualifications Standards. Please see the Professional Qualifications Standards at the following website at: *http://www.cr.nps.gov/local-law/arch_stnds_9.htm*

The Cultural Resources Report should include one of the four "findings" listed in Section 106. These include:

"No historic properties affected"
(no properties are within the area of potential effect (APE; including below the ground).

"No effect to historic properties"
(properties may be near the APE, but the project will not have any adverse effects).

"No adverse effect to historic properties"
(the project may affect "historic properties", but the effects will not be adverse).

"Adverse effect to historic properties"
Note: Consultation with the SHPO will be required if a "no adverse effect to historic properties" or an "adverse effect to historic properties" determination is made, to develop and evaluate alternatives or modifications to the proposed project that could avoid, minimize or mitigate adverse effects on "historic properties."

RECORDS SEARCH

- A records search (less than one year old) extending to a half-mile beyond the project APE from a geographically appropriate Information Center is required. The records search should include maps that show all recorded sites and surveys in relation to the APE for the proposed project, and copies of the confidential site records included as an appendix to the Cultural Resources Report.
- The APE is three-dimensional (depth, length and width) and all areas (e.g., new construction, easements, staging areas, and access roads) directly affected by the proposed project.

1-4
Cont'd

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CLEAN WATER STATE REVOLVING FUND

NATIVE AMERICAN and INTERESTED PARTY CONSULTATION

- Native American and interested party consultation should be initiated at the planning phase of the proposed project to gather information to assist with the preparation of an adequate Cultural Resources Report.
- The Native American Heritage Commission (NAHC) must be contacted to obtain documentation of a search of the Sacred Lands Files for or near the project APE.
- All local Native American tribal organizations or individuals identified by the NAHC must be contacted by certified mail, and the letter should include a map and a description of the proposed project.
- Follow-up contact should be made by telephone and a phone log maintained to document the contacts and responses.
- Letters of inquiry seeking historical information on the project area and local vicinity should be sent to local historical societies, preservation organizations, or individual members of the public with a demonstrated interest in the proposed project.

Copies of all documents mentioned above (project description, map, phone log and letters sent to the NAHC and Native American tribal organizations or individuals and interested parties) must be included in the Cultural Resources Report.

Contact Information: For more information related to the CWSRF Program Cultural Resources and Requirments, please contact Mr. Ahmad Kashkoli at 916-341-5855 or Ahmad.Kashkoli@waterboards.ca.gov

PRECAUTIONS

A finding of ***"no known resources"*** without supporting evidence is unacceptable. The Cultural Resources Report must identify resources within the APE or demonstrate with sufficient evidence that none are present.

"The area is sensitive for buried archaeological resources," followed by a statement that ***"monitoring is recommended."*** Monitoring is not an acceptable option without good-faith effort to demonstrate that no known resource is present.

If ***"the area is already disturbed by previous construction"*** documentation is still required to demonstrate that the proposed project will not affect "historic properties." An existing road can be protecting a buried archaeological deposit or may itself be a "historic property." Additionally, previous construction may have impacted an archaeological site that has not been previously documented.

1-4 Cont'd

SHPO CONSULTATION LETTER

Submit a draft consultation letter prepared by the qualified researcher with the Cultural Resources Report to the State Water Resources Control Board. A draft consultation letter template is available for download on the State Water Board webpage at: *http://www.waterboards.ca.gov/water_issues/programs/grants_loans/cwsrf_requirements.shtml*

California Water Boards
STATE WATER RESOURCES CONTROL BOARD
REGIONAL WATER QUALITY CONTROL BOARDS
waterboards.ca.gov

REVISED JAN. 2014

ENVIRONMENTAL REVIEW REQUIREMENTS

The Clean Water State Revolving Fund (CWSRF) Program is partially funded by the United States Environmental Protection Agency (EPA), and is subject to federal environmental regulations as well as the California Environmental Quality Act (CEQA). All applicants seeking CWSRF financing must comply with both CEQA and the federal cross-cutting regulations. The "**Environmental Package**" provides the forms and instructions needed to complete the environmental review requirements for CWSRF financing. The forms and instructions are available at: *http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml.*

Lead Agency/Applicant

The applicant will generally act as the "Lead Agency" for environmental review. It will prepare, circulate, and consider the environmental documents prior to approving the project. It also provides the State Water Board with copies of the CEQA documents, and a completed "**Environmental Evaluation Form for Environmental Review and Federal Coordination**" *(http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/docs/forms/application_environmental_package.pdf)* with supporting documents as part of the "**Environmental Package**."

Responsible Agency/State Water Board

The State Water Board acts on behalf of EPA to review and consider the environmental documents before approving financing. The State Water Board may require additional studies or documentation to make its own CEQA findings, as well as circulate CEQA documents and other environmental reports to relevant federal agencies for consultation before making a determination about the project financing.

The Applicant must address all relevant federal agencies' comments before project financing is approved.

FEDERAL CROSS-CUTTING REGULATIONS

The CWSRF Program requires consultation with relevant federal agencies on the following federal environmental regulations, if applicable to the project:

- Clean Air Act
- Coastal Barriers Resources Act
- Coastal Zone Management Act
- Endangered Species Act
- Environmental Justice
- Farmland Protection Policy Act
- Floodplain Management
- Magnuson-Stevens Fishery Conservation and Management Act
- Migratory Bird Treaty Act
- National Historic Preservation Act
- Protection of Wetlands
- Safe Drinking Water Act, Sole Source Aquifer Protection
- Wild and Scenic Rivers Act

The following is a brief overview of requirements for some of the key regulations.

Clean Air Act (CAA)

The CAA general conformity analysis only applies to projects in areas not meeting the National Ambient Air Quality Standards or subject to a maintenance plan.

If project emissions are below the federal "de minimis" levels then:

- A general conformity analysis is not required.

If project emissions are above the federal "de minimis" levels then:

- A general conformity determination for the project must be made. A general conformity determination can be made if facilities are sized to meet the needs of current population projections used in an approved State Implementation Plan for air quality.
- Using population projections, applicants must explain how the proposed capacity increase was calculated.

An air quality modeling analysis is necessary of all projects for the following criteria pollutants, regardless of attainment status:

- Carbon monoxide
- Lead
- Oxides of nitrogen
- Ozone
- Particulate matter (PM2.5 and PM10)
- Sulfur dioxide

Endangered Species Act (ESA)

The ESA requires an analysis of the effects on federally listed species. The State Water Board will determine the project's potential effects on federally listed species, and will initiate informal/formal consultation with the United States Fish and Wildlife Service (USFWS) and/or the National Marine Fisheries Service, as necessary under Section 7 of the ESA.

Required Documents:

- ✓ A species list, less than one year old, from the USFWS and the California Department of Fish and Wildlife's Natural Diversity Database;
- ✓ A biological survey conducted during the appropriate time of year;
- ✓ Maps or documents (biological reports or biological assessments, if necessary); and
- ✓ An assessment of the direct or indirect impacts to any federally listed species and/or critical habitat. If no effects are expected, explain why and provide the supporting evidence.

National Historic Preservation Act (NHPA)

Section 106 of the NHPA requires an analysis of the effects on "historic properties." The Section 106 process is designed to accommodate historic preservation concerns for federal actions with the potential to affect historic properties. Early consultation with appropriate government agencies, Indian tribes, and members of the public, will ensure that their views and concerns are addressed during the planning phase.

Historic properties (i.e., buildings, structures, objects, and archaeological sites 50 years or older) are properties that are included in the National Register of Historic Places or meet the criteria for the National Register.

Required Documents:

- ✓ A draft State Historic Preservation Officer consultation request letter; and
- ✓ A cultural resources report on historic properties conducted according to the Secretary of the Interior's Standards, including:
  - A clearly defined Area of Potential Effect (APE), specifying the length, width, and depth of excavation, with a map clearly illustrating the project APE;
  - A records search, less than one year old, extending to a half-mile beyond the project APE;
  - Written description of field methods;
  - Identification and evaluation of historic properties within the project's APE; and
  - Documentation of consultation with the Native American Heritage Commission and local Native American tribes.

ADDITIONAL INFORMATION

If your project has the potential to affect biological resources or historic properties, the consultation process can be lengthy. Please contact the State Water Board staff early in your planning process to discuss what additional information may be needed for your specific project.

Please contact your State Water Board Project Manager or Mr. Ahmad Kashkoli at (916) 341-5855 or *Ahmad.Kashkoli@waterboards.ca.gov* for more information related to the CWSRF Program environmental review process and requirements.

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to keep California's **water clean**.
CLEAN WATER STATE REVOLVING FUND

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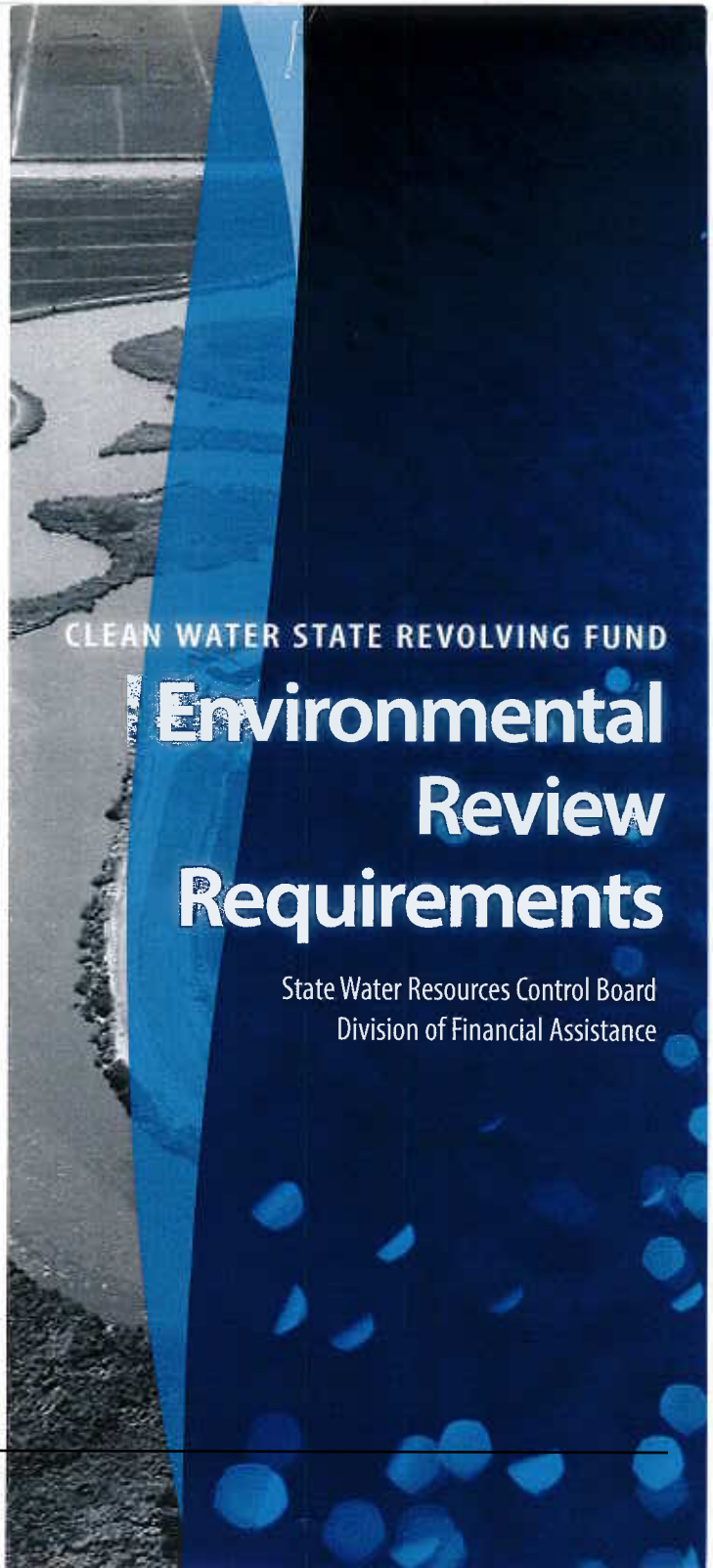
STATE WATER RESOURCES CONTROL BOARD
REGIONAL WATER QUALITY CONTROL BOARDS

www.waterboards.ca.gov

1-4 Cont'd



CLEAN WATER STATE REVOLVING FUND

Environmental Review Requirements

State Water Resources Control Board
Division of Financial Assistance

REVISED FEB 2014

Comment Letter 1: State Water Resources Control Board

Response 1-1

The commenter states that they understand that the Lead Agency may be pursuing Clean Water State Revolving Fund (CWSRF) financing for the Proposed Project, and provides an explanation of the federal requirements for environmental review related to such financing.

As discussed in Chapter 1, Introduction, Section 1.2.2, CEQA-Plus, on page 1-4 of the Draft Environmental Impact Report (EIR):

> "The City may pursue federal funding for the Proposed Project through the Clean Water State Revolving Fund, which is partially funded by the United States Environmental Protection Agency. This fund, which is administered through the State Water Resources Control Board's Division of Financial Assistance, implements the Clean Water Act and various state laws by providing funding for wastewater treatment facilities, recycled water facilities, and other water quality facilities that "protect and promote health, safety and welfare of the inhabitants of the state". Due to the possibility of federal funding and of approval by the Corps [United States Army Corps of Engineers], the Proposed Project would be subject to federal environmental regulations, as applicable. Therefore, this document has been prepared in accordance with the *Environmental Review Guide for Special Appropriation Grants* and the *Environmental Review Process Guidelines for State Revolving Fund Applicants*. Based on these guidelines, this Draft EIR includes additional "CEQA-Plus" information pertaining to federally designated endangered species, cultural resource protection, conformity with applicable air management plans, environmental justice, and other federal executive orders and federal regulations (see Appendix B)."

Should the Lead Agency decide to pursue CWSRF financing for the Proposed Project, this EIR is intended to fulfill the applicable federal environmental review per the CWSRF application requirements.

Response 1-2

The commenter states that the Draft EIR does not include a reference to compliance with Assembly Bill (AB) 52 requirements. AB 52 was enacted to provide early notification and opportunity for consultation regarding impacts to tribal cultural resources and mitigation. The provisions of AB 52 apply to projects with a Notice of Preparation of an EIR (NOP) filed on or after July 1, 2015. The NOP for the Proposed Project was filed on September 6, 2013."

However, the Draft EIR acknowledges that the Proposed Project is located in an area that may be culturally sensitive for prehistoric and/or historic archaeological resources. As such, appropriate analyses and tribal contacts were undertaken. Mitigation Measure CR-A would be implemented to ensure that impacts to these resources would be reduced to a less than significant level. Mitigation Measure CR-A, outlined on page 3-5.10 of the Draft EIR, requires that a qualified archaeological consultant conduct training of construction personnel and supervisory staff on possible archaeological resources that may be present in the area in order to establish an understanding of what to look for during ground-disturbing activities and apprise them of appropriate handling of such resources. Mitigation Measure CR-A further states that if prehistoric archaeological sites are encountered within the Project area, a trained Native

American consultant shall be engaged to monitor ground-disturbing work in the area containing the Native American cultural resources. This monitoring is intended to ensure that Native American concerns are taken into account during the construction process. Thus, mitigation is in place to consult with Native American parties in the event that resources are discovered.

Additionally, as discussed in Section 3.5, Cultural Resources, page 3.5-2 of the Draft EIR, a Native American contact program was conducted for the Proposed Project. As described on page 3.5-2, "letters were prepared and sent to the Native American Heritage Commission (NAHC) on October 21, 2013; July 20, 2015; and March 30, 2016. The letter requested that a Sacred Lands File check be conducted for the Proposed Project and that contact information be provided for Native American groups or individuals that may have concerns about cultural resources in the Project area. The initial round of Project information letters was mailed on November 6, 2013 to each group or individual provided on the contact list (see Table 7 in Appendix E of this Draft EIR). A second round of contact letters was mailed on August 10, 2015, to each group or individual provided on the updated contact list provided by the NAHC on August 6, 2015, as well as those individuals provided on the original contact list on November 5, 2013 (see Table 8 in Appendix E of this Draft EIR). A third round of contact letters was mailed on March 30, 2016, based upon the contact list of November 5, 2013, and August 6, 2015. Additional contact letters were sent on April 5, 2016, to additional groups or individuals on an updated contact list provided by NAHC (see Table 9 in Appendix E of this Draft EIR)." Thus, contact with interested Native American parties has occurred throughout the environmental review process for the Proposed Project, and these contacts will be notified of the availability of the Final EIR and future Project hearings.

Response 1-3

The commenter requests documents related to the Proposed Project per the requirements for CWSRF funding. See Response 1-1 above regarding requirements for CWSRF financing. Additionally, the State Water Resources Control Board is already included in the project mailing list and will be notified of the availability of the Final EIR and related documents, as well as future project hearings, as requested.

Response 1-4

The commenter includes attachments to their comment letter describing the CWSRF financing requirements. These attachments are acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
www.dot.ca.gov

Comment Letter No. 2

Serious Drought.
Serious drought.
Help save water!

July 11, 2016

Ms. Nadia Parker
Los Angeles Dept. of Water and Power
111 North Hope Street, Rm. 1044
Los Angeles, CA 90012

Re: Los Angeles Groundwater Project
SCH# 2013091023
IGR# 160524RH

Dear Ms. Nadia Parker:

Thank you for including the California Department of Transportation (Caltrans) in the Environmental Review process for the above referenced project. The project proposes to construct an Advanced Water Purification Facility (AWPF), within the Donald C. Tillman Water Reclamation Plant (DCTWRP), to purify recycled water produced by the existing DCTWRP recycled water treatment facilities. 2-1

The nearest State facilities to the proposed project are I-405 and I-5. Caltrans does not expect project approval to result in a direct impact to State transportation facilities. However, if any of the proposed work takes place within the State's right of way, an encroachment permit will be required and environmental concerns must be adequately addressed. 2-2

Storm water run-off is a sensitive issue for Los Angeles County. Please be mindful that projects should be designed to discharge clean run-off water. Discharge of storm water run-off is not permitted on State Highway facilities without a storm water management plan. 2-3

In addition, please be reminded that transportation of heavy construction equipment, material, or other special equipment which requires the use of oversized-transport vehicles on State highways, will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute hours. 2-4

If you have any questions regarding these comments, please contact project coordinator Rick Holland, at (213) 897-4230 and refer to IGR/CEQA No. 160524RH.

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

Comment Letter 2: California Department of Transportation

Response 2-1

This comment includes introductory remarks and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft Environmental Impact Report (EIR). Therefore, no further response to this comment is provided.

Response 2-2

The commenter states that the nearest state transportation facilities to the Proposed Project are I-405 and I-5. As discussed in Chapter 2, Description of the Proposed Project, the proposed Donald C. Tillman Water Reclamation Plant (DCTWRP) facilities would be constructed within the boundaries of the DCTWRP property, with the exception of the proposed 24-inch diameter brine line. The brine line would be approximately 3,000 feet long and routed primarily within the DCTWRP property, with approximately 300 feet located within Haskell Avenue to connect with an existing sewer line in Victory Boulevard west of I-405. No portion of the brine line would be installed within the state's right-of-way along I-405.

The proposed improvements at Pacoima Spreading Grounds (PSG) and Hansen Spreading Grounds (HSG) would occur entirely within the boundaries of the respective spreading grounds. The proposed 42-inch recycled water pipeline would be constructed along Arleta Avenue from Branford Street and would enter the PSG property adjacent to Devonshire Street. No portion of the proposed PSG and HSG improvements or the recycled water pipeline would be constructed on or near any state transportation facilities.

Response 2-3

The approvals and permits that would be required to implement the Proposed Project are listed in Chapter 2, Description of the Proposed Project, Section 2.8, Required Permits and Approvals, beginning on page 2-35 of the Draft EIR. As listed in the approvals and permits that would need to be obtained from the Los Angeles Regional Water Quality Control Board (RWQCB), the Proposed Project would require coverage under California's General Construction Activity Stormwater Permit, which requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) pursuant to the National Pollutant Discharge Elimination System (NPDES).

As discussed in Section 3.9, Hydrology, Water Quality, and Groundwater, on page 3.9-21 of the Draft EIR, a "site-specific SWPPP would be developed and implemented to control pollutants in stormwater discharges during demolition and construction activities…With implementation of BMPs [Best Management Practices] outlined in the SWPPP and adherence of inspection and monitoring requirements, stormwater discharges during construction are not anticipated to violate any water quality standards or waste discharge requirements set by RWQCB." As further stated on page 3.9-21 of the Draft EIR, "As part of the City of Los Angeles Department of Building and Safety approval process, LADWP would be required to prepare a Site-Specific Stormwater Mitigation Plan for the post-development Project site that contains BMPs including LID [Low Impact Development] features that would be implemented to protect water quality in stormwater discharges leaving the Project site. Compliance with this requirement would ensure impacts to receiving water quality from stormwater discharges with implementation of the Proposed Project would be less than significant." Additionally, as discussed on page 3.9-22 of the Draft EIR, the Los Angeles Department of Public Works Bureau of Sanitation "would be

required to update DCTWRP's Industrial SWPPP to include the new Project components and additional structural and non-structural BMPs as appropriate. Proper implementation of the SWPPP and monitoring program would ensure the Proposed Project is in compliance with the General Industrial Permit, and water quality impacts from stormwater discharges to the Los Angeles River would be considered less than significant."

Response 2-4

The Proposed Project would be required to comply with all applicable California Department of Transportation regulations during construction. As listed in the Required Permits and Approvals for the Proposed Project on page 2-35 of the Draft EIR, a Transportation Permit for oversize loads on state highways would be obtained from the California Department of Transportation. To the extent practicable, large size truck trips would be limited to off-peak commute periods.

Comment Letter No. 3

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

July 12, 2016

Nadia Parker
Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Subject: Los Angeles Groundwater Replenishment Project
SCH#: 2013091023

Dear Nadia Parker:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 11, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that: 3-1

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. 3-2

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

Document Details Report
State Clearinghouse Data Base

SCH#	2013091023
Project Title	Los Angeles Groundwater Replenishment Project
Lead Agency	Los Angeles Department of Water and Power

Type	EIR Draft EIR
Description	Note: Review Per Lead Under the proposed project, an Advanced Water Purification Facility would be constructed within the Donald C. Tillman Water Reclamation Plant to purify recycled water produced by the existing DCTWRP recycled water treatment facilities. AWPF purified water would reach the spreading grounds using the existing East Valley Recycled Water Line that currently connects the Balboa Pump Station to Hansen Spreading Grounds and the Hansen Storage Tank at the LADWP Valley Generating Station. A new 42-in diameter pipeline would be constructed beginning at the intersection of Branford Street and Arleta Ave and proceed northwesterly along Arleta Ave to reach Pacoima Spreading Grounds.

Lead Agency Contact

Name	Nadia Parker		
Agency	Los Angeles Department of Water and Power		
Phone	213-367-1745	*Fax*	
email			
Address	111 North Hope Street, Room 1044		
City	Los Angeles	*State* CA	*Zip* 90012

Project Location

County	Los Angeles			
City	Los Angeles; City of, Van Nuys			
Region				
Lat / Long	34° 10' 57.63" N / 118° 28' 50.9" W			
Cross Streets	Victory Blvd and Woodley Ave			
Parcel No.	2251002903			
Township	*Range*	*Section*	*Base*	

Proximity to:

Highways	I-405, US 101
Airports	Van Nuys, Whiteman
Railways	UP
Waterways	Los Angeles River, Lake Balboa, Wildlife Lake, Haskell Creek
Schools	various
Land Use	DCTWRP - Public Facilities/open space; HSG - Open Space; PSG - Public Facilities/Open Space

Project Issues	Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual
Reviewing Agencies	Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Native American Heritage Commission; Public Utilities Commission; State Water Resources Control Board, Division of Drinking Water; State Water Resources Control Board, Division of Drinking Water, District 7; State Water Resources Control Board, Divison of Financial Assistance; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control

3-3

Note: Blanks in data fields result from insufficient information provided by lead agency.

Date Received 05/12/2016 *Start of Review* 05/12/2016 *End of Review* 07/11/2016

3-3
Cont'd.

Note: Blanks in data fields result from insufficient information provided by lead agency.

CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

clear 7/11/16

State Water Resources Control Board

JUN 08 2016

Governor's Office of Planning & Research

JUN 13 2016

STATE CLEARINGHOUSE

Nadia Parker
Los Angeles Department of Water and Power
111 N. Hope Street, Room 1044
Los Angeles, CA 90012

Dear Ms. Nadia Parker:

ENVIRONMENTAL IMPACT REPORT (EIR) FOR LOS ANGELES DEPARTMENT OF WATER AND POWER (CITY); LOS ANGLES GROUNDWATER REPLENISHMENT PROJECT (PROJECT); LOS ANGELES COUNTY; STATE CLEARINGHOUSE NO. 2013091023

We understand that the City will be pursuing Clean Water State Revolving Fund (CWSRF) financing for this Project. As a funding agency and a state agency with jurisdiction by law to preserve, enhance, and restore the quality of California's water resources, the State Water Resources Control Board (State Water Board) is providing the following information on the EIR to be prepared for the Project.

The State Water Board, Division of Financial Assistance, is responsible for administering the CWSRF Program. The primary purpose for the CWSRF Program is to implement the Clean Water Act and various state laws by providing financial assistance for wastewater treatment facilities necessary to prevent water pollution, recycle water, correct nonpoint source and storm drainage pollution problems, provide for estuary enhancement, and thereby protect and promote health, safety and welfare of the inhabitants of the state. The CWSRF Program provides low-interest funding equal to one-half of the most recent State General Obligation Bond Rates with a 30-year term. Applications are accepted and processed continuously. Please refer to the State Water Board's CWSRF website at: www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/index.shtml. 3-4

The CWSRF Program is partially funded by the United States Environmental Protection Agency and requires additional "CEQA-Plus" environmental documentation and review. Three enclosures are included that further explain the CWSRF Program environmental review process and the additional federal requirements. For the complete environmental application package please visit: http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml. The State Water Board is required to consult directly with agencies responsible for implementing federal environmental laws and regulations. Any environmental issues raised by federal agencies or their representatives will need to be resolved prior to State Water Board approval of a CWSRF financing commitment for the proposed Project. For further information on the CWSRF Program, please contact Mr. Ahmad Kashkoli, at (916) 341-5855.

It is important to note that prior to a CWSRF financing commitment, projects are subject to provisions of the Federal Endangered Species Act (ESA), and must obtain Section 7 clearance from the United States Department of the Interior, Fish and Wildlife Service (USFWS), and/or the United States Department of Commerce National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS) for any potential effects to special-status species.

Please be advised that the State Water Board will consult with the USFWS, and/or the NMFS regarding all federal special-status species that the Project has the potential to impact if the Project is to be financed by the CWSRF Program. The City will need to identify whether the Project will involve any direct effects from construction activities, or indirect effects such as growth inducement, that may affect federally listed threatened, endangered, or candidate species that are known, or have a potential to occur in the Project site, in the surrounding areas, or in the service area, and to identify applicable conservation measures to reduce such effects.

In addition, CWSRF projects must comply with federal laws pertaining to cultural resources, specifically Section 106 of the National Historic Preservation Act (Section 106). The State Water Board has responsibility for ensuring compliance with Section 106, and must consult directly with the California State Historic Preservation Officer (SHPO). SHPO consultation is initiated when sufficient information is provided by the CWSRF applicant. If the City decides to pursue CWSRF financing, please retain a consultant that meets the Secretary of the Interior's Professional Qualifications Standards (http://www.nps.gov/history/local-law/arch_stnds_9.htm) to prepare a Section 106 compliance report.

3-4 Cont'd.

Note that the City will need to identify the Area of Potential Effects (APE), including construction and staging areas, and the depth of any excavation. The APE is three-dimensional and includes all areas that may be affected by the Project. The APE includes the surface area and extends below ground to the depth of any Project excavations. The records search request should extend to a ½-mile beyond Project APE. The appropriate area varies for different projects but should be drawn large enough to provide information on what types of sites may exist in the vicinity.

Other federal environmental requirements pertinent to the Project under the CWSRF Program include the following (for a complete list of all federal requirements, please visit: http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/docs/forms/application_environmental_package.pdf):

A. An alternative analysis discussing environmental impacts of the Project in either the CEQA document (Negative Declaration, Mitigated Negative Declaration or Environmental Impact Report) or in a separate report.

B. A public hearing or meeting must be held for all projects except for those with little or no environmental impacts.

C. Compliance with the Federal Clean Air Act: (a) Provide air quality studies that may have been done for the Project; and (b) if the Project is in a nonattainment area or attainment area subject to a maintenance plan; (i) provide a summary of the estimated emissions (in tons per year) that are expected from both the construction and operation of the Project for each federal criteria pollutant in a nonattainment or maintenance area, and indicate if the nonattainment designation is moderate, serious, or severe (if applicable); (ii) if emissions are above the federal de minimis levels, but the Project is sized to meet only the needs of current population projections that are used in the approved State Implementation Plan for air quality, quantitatively indicate how the proposed capacity increase was calculated using population projections.

D. Compliance with the Coastal Zone Management Act: Identify whether the Project is within a coastal zone and the status of any coordination with the California Coastal Commission.

E. Protection of Wetlands: Identify any portion of the proposed Project area that should be evaluated for wetlands or United States waters delineation by the United States Army Corps of Engineers (USACE), or requires a permit from the USACE, and identify the status of coordination with the USACE.

F. Compliance with the Farmland Protection Policy Act: Identify whether the Project will result in the conversion of farmland. State the status of farmland (Prime, Unique, or Local and Statewide Importance) in the Project area and determine if this area is under a Williamson Act Contract.

3-4 Cont'd.

G. Compliance with the Migratory Bird Treaty Act: List any birds protected under this act that may be impacted by the Project and identify conservation measures to minimize impacts.

H. Compliance with the Flood Plain Management Act: Identify whether or not the Project is in a Flood Management Zone and include a copy of the Federal Emergency Management Agency flood zone maps for the area.

I. Compliance with the Wild and Scenic Rivers Act: Identify whether or not any Wild and Scenic Rivers would be potentially impacted by the Project and include conservation measures to minimize such impacts.

Following is the specific comment on the City's draft EIR:

1. There is no reference to compliance with the Assembly Bill (AB) 52 requirements. The District should clarify if any consultations were conducted per AB 52.

Please provide us with the following documents applicable to the proposed Project following the City's California Environmental Quality Act (CEQA) process: (1) one copy of the draft and final EIR, (2) the resolution certifying the EIR and making CEQA findings, (3) all comments received during the review period and the City's response to those comments, (4) the adopted Mitigation Monitoring and Reporting Program (MMRP), and (5) the Notice of Determination filed with the Los Angeles County Clerk and the Governor's Office of Planning and Research, State Clearinghouse. In addition, we would appreciate notices of any hearings or meetings held regarding environmental review of any projects to be funded by the State Water Board.

Thank you for the opportunity to review the City's draft EIR. If you have any questions or concerns, please feel free to contact me at (916) 319-8574, or by email at Trevor.Cleak@waterboards.ca.gov, or contact Ahmad Kashkoli at (916) 341-5855, or by email at Ahmad.Kashkoli@waterboards.ca.gov.

3-4 Cont'd.

Sincerely,

Trevor Cleak
Environmental Scientist

Enclosures (3)

1. Clean Water State Revolving Fund Environmental Review Requirements
2. Quick Reference Guide to CEQA Requirements for State Revolving Fund Loans
3. Basic Criteria for Cultural Resources Reports

cc: State Clearinghouse
(Re: SCH# 2013091023)
P.O. Box 3044
Sacramento, CA 95812-3044

Comment Letter 3: State of California Governor's Office of Planning and Research, State Clearinghouse

Response 3-1

The commenter states that the State Clearinghouse circulated the Draft Environmental Impact Report (EIR) to selected state agencies for review during the public review period and that comments from responding agencies are attached. Because the comment does not raise issues regarding the adequacy of the analysis in the Draft EIR, no further response is provided.

Response 3-2

The commenter acknowledges that the lead agency has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act (CEQA). Because the comment does not raise issues regarding the adequacy of the analysis in the Draft EIR, no further response to this comment is provided.

Response 3-3

The Document Details Report from the State Clearinghouse database explaining the distribution of the Draft EIR is noted. Because the comment does not raise issues regarding the adequacy of the analysis in the Draft EIR, no further response to this comment is provided.

Response 3-4

The comment letter from the State Water Resources Control Board is attached. See Responses 1-1 through 1-4 above for responses to these comments.

July 26, 2016

Ms. Nadia Parker
Los Angeles Department of Power and Water
Environmental Affairs
111 North Hope Street, Room 1044
Los Angeles, California 90012

DRAFT ENVIRONMENTAL IMPACT REPORT
LOS ANGELES GROUNDWATER REPLENISHMENT PROJECT

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the Los Angeles Groundwater Replenishment Project (LAGRP). The proposed project consists of: 1) treatment – the construction of new advanced water purification facilities (AWPF) that would perform additional treatment of tertiary effluent (Title 22 treated recycled water) from the existing DCTWRP; 2) conveyance – the use of existing and newly constructed pipelines to transport the purified recycled water from the AWPF to spreading grounds and injection wells; and 3) replenishment – spreading of the purified recycled water at the Hansen Spreading Grounds (HSG) and the Pacoima Spreading Grounds (PSG) for percolation and would include installation of up to 13 new injection wells for direct injection into the SFB to increase groundwater supply by supplementing local potable water supplies. 4-1

The following County of Los Angeles Department of Public Works (LACDPW) comments are for your consideration and relate to the environmental document only:

General: 4-2

1. The DEIR should include the long-term maintenance activities needed, and the appropriate entity that will perform these activities to continue the operation of the proposed facilities, structures, and surrounding project areas, not just the construction of it.

2. The DEIR should disclose that a Maintenance/Use Agreement needs to be developed between the Los Angeles County Flood Control District (LACFCD)/LACDPW and the Los Angeles Department of Water and Power, and/or any other appropriate agency, to identify each agency's respective maintenance responsibilities. 4-3

3. LACFCD, Flood Maintenance Division, West Area maintains Pacoima Spreading Grounds and Hansen Spreading Grounds within the proposed project limits. The existing facilities and appurtenant structures shall be protected in place during construction. 4-4

4. The construction plans should include a note stating that the proposed improvements will not be maintained by LACFCD or LACDPW. 4-4 Cont'd

5. Any connections to LACFCD facilities will require a flood permit from LACDPW, Land Development Division. 4-5

6. Easements to the Hansen Spreading Grounds and Pacoima Spreading Grounds will need to be acquired from the County of Los Angeles and processed by LACDPW, Survey/Mapping & Property Division. 4-6

7. Ingress/egress access by LACFCD maintenance vehicles along LACFCD's road right of way (ROW) shall be preserved after construction of the subject project. 4-7

For questions regarding comments number 1-7 please contact Jemellee Cruz of Flood Maintenance Division at (626) 458-4170 or jcruz@dpw.lacounty.gov.

Executive Summary

8. Page ES-4: Hansen Spreading Grounds (HSG) and Pacoima Spreading Grounds (PSG) have the capacity to accept an additional 30,000 AFY for groundwater replenishment (GWR). It's important to note that storm water runoff will be given the highest priority for utilizing the available capacity at HSG and PSG. After giving full consideration and priority to storm water, there may be unused capacity available which can be used to accept purified water from LADWP for GWR at HSG and PSG. Also, recent upgrades at Big Tujunga Dam may lead to additional storage and release of storm water for recharge at HSG. Therefore, there may or may not be sufficient additional capacity to recharge 30,000 AFY of purified water at HSG and PSG in any given year. This comment should be taken into consideration each time the DEIR mentions average and maximum amounts of purified water recharge anticipated at HSG and PSG. 4-8

9. Page ES-4 and 2-9: Revise the estimated maximum storage value for PSG from 173 million gallons to 143 million gallons. 4-9

10. Page ES-7 and 2-9: Throughout the document revise the "HSG is operated by the Los Angeles County Department of Public Works" to "HSG is owned and operated by LACDPW". 4-10

11. Page ES-8 and 2-9: Throughout the document revise the "PSG is operated by LACDPW" to "PSG is owned and operated by LACDPW". 4-10 Cont'd

12. Page ES-7, Section ES.4.2: This section states that HSG has 8 medium basins. Revise this section to reflect that HSG has 6 medium basins, 2 small desilting basins, and 1 small distribution basin. 4-11

Chapter 1 - Introduction

13. Page 1-3: Revise "The Los Angeles County Department of Public Works is also a CEQA responsible agency because it owns and operates Hansen Spreading Grounds (HSG) and Pacoima Spreading Grounds (PSG) and therefore must approve construction at the spreading grounds and the use of the spreading grounds by LADWP for groundwater replenishment." to "The Los Angeles County Department of Public Works is also a CEQA responsible agency because it owns and operates Hansen Spreading Grounds (HSG) and Pacoima Spreading Grounds (PSG) and therefore must approve construction at the spreading grounds and accept purified water for GWR. LACDPW will accept the water for GWR, but will not allow other agencies to "use" the spreading grounds." 4-12

Chapter 2 – Description of the Proposed Project

14. Page 2-16: Please specify whether in the event only one SG facility is available, the 30 mgd can be supplied to the remaining facility. 4-13

Chapter 3 – Environmental Setting, Impacts, and Mitigation

15. Section 3.6, Geology and Soils, page 3.6-8: "Additionally PSG and HSG contain portions of areas that are within a City-designated liquefiable area as identified in the General Plan."

    On average, PSG and HSG capture 5,125 AFY and 10,616 AFY, respectively. The DEIR should address if increasing the amount of GWR at each facility by 15,000 AFY (i.e., effectively tripling and doubling the average amount of GWR) have any effect on the liquefaction potential for the areas immediately surrounding each facility. 4-14

16. Section 3.6, Geology and Soils, page 3.6-10 and 3.9-7: "Spreading at HSG beyond its maximum limit of 35,000 AFY could contribute to increased groundwater levels, which can create potential impacts at 4-15

nearby facilities such as flooding, slope failure in adjacent gravel quarries and groundwater mounding beneath the Bradley landfill, which could lead to water intrusion into the landfill containment systems and the generation of leachates."

Please note that even recharging less than 35,000 AFY at HSG can significantly impact groundwater levels. For example, in 2010-11, a little over 18,000 AF were recharged at HSG and adjacent gravel quarries indicated a significant increase in groundwater levels and noted an increase in water entering their facilities from the sides of the quarries. Overall, 35,000 AFY should not necessarily be used as a threshold below which there will be no significant changes in local and regional groundwater levels and associated impacts. 4-15 Cont'd

17. Section 3.6, Geology and Soils: Has there been an evaluation on the difference/compatibility in water chemistry between native groundwater and the proposed purified water? Will the purified water be stabilized post reverse osmosis and prior to delivery to prevent a possible negative interaction with the native groundwater and geology, such as leaching minerals/metals and/or affecting clay lenses? 4-16

18. Section 3.9, Hydrology, Water Quality, and Groundwater, page 3.9-9: Revise the "LACDPW conducts basin maintenance activities typically following high runoff seasons." to "LACDPW conducts basin maintenance activities typically following every storm season." 4-17

19. Section 3.9, Hydrology, Water Quality, and Groundwater, page 3.9-9: "In contrast, groundwater replenishment with purified recycled water is not expected to cause any significant decline in percolation rates as the purified recycled water is extremely low in suspended solids and turbidity." 4-18

    Our experience indicates that continuous recharge at our facilities leads to the creation of a groundwater mound which reduces percolation rates, regardless of the type/quality of the water. The only way to regain percolation rates is to suspend recharge operations at the facility and allow the groundwater mound to dissipate.

20. Section 3.9, Hydrology, Water Quality, and Groundwater, page 3.9-12: "At HSG, groundwater most likely would be encountered at approximately 200 feet bgs." 4-19

This comment needs clarification. Depth to groundwater at HSG is highly variable and dependent upon the amount of recharge activities at the facility. 4-19 Cont'd

21. Section 3.9, Hydrology, Water Quality, and Groundwater, page 3.9-12: "To partially offset the increased runoff due to urbanization, Pacoima, Big Tujunga and Hansen dams, originally built for flood control, are now utilized to regulate storm flows and to allow recapture of a portion of the flow in downstream spreading basins operated by the LACDPW and the City of Los Angeles." 4-20

Please note, Pacoima and Big Tujunga are owned and operated by LACDPW, and are still used first for flood control, and then for water conservation if flood control is not an issue for a given storm. Hansen dam is owned and operated by the US Army Corps and is only used for flood control.

22. Section 3.9, Hydrology, Water Quality, and Groundwater, page 3.9-24: "Based on available information, the percolation capacity of HSG would be sufficient to allow for continued recharge with storm-water as well as the additional 15,000 AFY of purified recycled water, if HSG receives water continuously throughout the year."

Please see comment #8 above regarding priority of the usage of the available capacity at HSG. In a given year, sufficient additional capacity may or may not be available to recharge 15,000 AF of purified water at HSG. 4-21

23. Section 3.9, Hydrology, Water Quality, and Groundwater, page 3.9-24: "Based on available information, the percolation capacity of PSG would be sufficient to allow for continued recharge with storm-water as well as the additional volume of purified recycled water."

Please see comment #8 above regarding priority of the usage of the available capacity at PSG. In a given year, sufficient additional capacity may or may not be available to recharge 15,000 AF of purified water at PSG.

24. Section 3.9, Hydrology, Water Quality, and Groundwater, page 3.9-25: "Recharge of purified recycled water to HSG and PSG would not occur during times of the year (primarily winter months) when LACDPW is 4-22

releasing storm flows from Hansen, Big Tujunga and Pacoima Dams to recharge the basins."

Please note that LACDPW does not own or operate Hansen Dam, and does not direct releases of storm flows from this facility. Also, recharge of purified recycled water at HSG and PSG may be suspended during actual storm events due to limits on available capacity. Finally, releases from Big Tujunga and Pacoima dams for recharge at HSG and PSG may occur for multiple months during the summer, depending upon how much rainfall occurring during the winter months. This could also lead to suspending the recharge of purified recycled water at HSG and PSG. 4-22 Cont'd

25. Section 3.9, Hydrology, Water Quality, and Groundwater, page 3.9-25: The projected time that the facilities would be unavailable for recharge are estimates only, and should only be used for discussion purposes. 4-23

26. Section 3.9, Hydrology, Water Quality, and Groundwater, page 3.9-25: "A Memorandum of Understanding would be established between LADWP and LACDPW to establish these safe operating procedures to maximize stormwater recharge at HSG and PSG and allow LADWP to safely recharge with purified recycled water when the basins are available." 4-24

As indicated above, LACDPW will accept the water for GWR, but will not allow other agencies to "use" the spreading grounds. Please modify the last portion of the sentence as follows "maximize Stormwater recharge at HSG and PSG and accept purified recycled water when the basins are available."

For questions regarding comment number 8-26 please contact Eric Batman of Water Resources Division at (626) 458-6308 or ebatman@dpw.lacounty.gov.

If you have any other questions or require additional information, please contact Toan Duong of Land Development Division at (626) 458- 4945 or tduong@dpw.lacounty.gov.

AM:
P:\ldpub\SUBPCHECK\Plan Checking Files\Projects not associated with a TR-PM-CUP-Single Lot-Permit\Los Angeles Ground Water Replenishment Project\DEIR\2016-06-21 DEIR SUBMITTAL\2016-07-19 DEIR - Los Angeles Ground Water Replenishment Project.docx

Comment Letter 4: Los Angeles County Department of Public Works

Response 4-1

The commenter provides a summary description of the Proposed Project. It should be noted that while this summary includes injection wells as a Project component to provide replenishment of the groundwater basin with purified water, no injection wells are proposed under the Project as described in the Draft Environmental Impact Report (EIR). As stated in numerous locations in Chapter 2, Description of the Proposed Project, of the Draft EIR, replenishment would be achieved by spreading the purified water at Hansen Spreading Grounds (HSG) and Pacoima Spreading Grounds (PSG).

Response 4-2

The commenter mentions that the Draft EIR should include the long-term maintenance activities needed for the continued operation for the Project. As discussed throughout the Draft EIR, operations and routine maintenance of the Advanced Water Purification Facilities (AWPF) and ancillary facilities at Donald C. Tillman Water Reclamation Plant (DCTWRP) would be conducted within the boundaries of the DCTWRP property. Because the AWPF would be an extension of the wastewater treatment operations at DCTWRP, it would be operated and maintained by the Los Angeles Department of Public Works Bureau of Sanitation (LASAN), which owns and operates DCTWRP. As listed in Chapter 2, Description of the Proposed Project, Section 2.8, Required Permits and Approvals, on page 2-35 of the Draft EIR, the Proposed Project would require an approval by the City of Los Angeles Board of Public Works of a Memorandum of Agreement between Los Angeles Department of Water and Power (LADWP) and LASAN for the design, construction, operation, maintenance, and reimbursements for the AWPF and related facilities at DCTWRP. Routine maintenance activities at the AWPF would include monitoring and periodic replacement as necessary of the microfiltration and reverse osmosis membranes to maintain system efficiency.

Once the purified water is delivered to the East Valley Recycled Water Line via the Balboa Pump Station, it is owned by LADWP. Also discussed throughout the Draft EIR, routine inspection and maintenance associated with the recycled water pipeline would occur approximately every 5 to 10 years and would not substantially disrupt area roadways. Similar to existing pipeline maintenance, these inspection and maintenance activities would be undertaken by LADWP. Routine maintenance activities would be minimal and would include monitoring for leaks and corrosion and making any necessary repairs.

Regarding maintenance of the proposed HSG and PSG improvements, page 2-36 of the Draft EIR, states that the Proposed Project would require approval by the Los Angeles County Department of Public Works (LACDPW) of a Memorandum of Understanding for the operations and maintenance for spreading of purified water at HSG and PSG. Typical maintenance activities would be minimal and would include monitoring for and repairing leaks at gate valves and outlet structures.

Response 4-3

The commenter indicates that the Draft EIR should disclose the requirement for a maintenance/use agreement between LADWP and the Los Angeles County Flood Control District (LACFCD)/LACDPW. As stated on page 2-36 of the Draft EIR, the approvals required for the Project would include the approval by LACDPW of a Memorandum of Understanding for

the operation and maintenance involved in the spreading of purified water at HSG and PSG and the approval of a Memorandum of Understanding for permanent easements for the new facilities constructed at HSG and PSG.

Response 4-4

The commenter's statement that existing facilities and structures at HSG and PSG shall be protected in place during construction and that construction plans should include a note regarding maintenance of the proposed improvements is noted. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. Therefore, no further response to this comment is provided. Notwithstanding, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Response 4-5

The commenter states that connections to LACFCD facilities would require a flood permit from LACDPW, Land Development Division. The commenter is referred to Chapter 2, Clarifications and Modifications, page 2-3 of this Final EIR, which includes the addition of this permit requirement for the Project.

Response 4-6

The commenter states that easements to HSG and PSG would need to be acquired from the County of Los Angeles and processed by LACDPW. The commenter is referred to Chapter 2, Description of the Proposed Project, Section 2.8, Required Permits and Approvals, of the Draft EIR, which lists the approvals and permits that would be required to implement the Proposed Project. As indicated on page 2-36 of the Draft EIR, the approval by LACDPW of a Memorandum of Understanding would be required for "permanent easements for the new facilities constructed at HSG and PSG."

Response 4-7

The commenter states that vehicular access along the LACFCD's road right-of-way shall be preserved after construction. Following the completion of construction activities at the DCTWRP property, access to all Los Angeles County Flood Control District rights-of-way would be fully restored.

Response 4-8

The Draft EIR acknowledges that there are periods of time when it would not be possible to spread purified water at HSG and PSG due to various factors, including stormwater capture at HSG and PSG. As stated in Chapter 2, Description of the Proposed Project, page 2-33 of the Draft EIR, the AWPF would generally be taken offline when HSG and/or PSG would be unavailable for groundwater recharge due to stormwater capture. Additionally, as stated on page 2-34 of the Draft EIR, up to 19,000 acre-feet per year (AFY) and up to 23,000 AFY of purified water could be spread at HSG and PSG, respectively, based on the availability of supply and the capacity of the spreading grounds in a given year in relation to all potential sources of water. Thus, 19,000 AFY and 23,000 AFY are discussed as the maximum amount of purified water that could be spread at HSG and PSG, respectively. Furthermore, as stated throughout the Draft EIR, it is estimated that an average of 15,000 AFY would be recharged at

each of the spreading grounds with implementation of the Proposed Project. Therefore, the Draft EIR acknowledges that the various conditions, including stormwater capture, would affect the amount of purified water that could be spread for groundwater recharge at the spreading grounds. Additionally, the Draft EIR makes distinctions between the maximum amount of purified water that could be spread versus the annual average that is anticipated to be spread. By estimating 15,000 AFY of purified water as an average, it is inherent that less than this amount could be spread in any given year.

Response 4-9

The commenter provides a clarification regarding the estimated maximum storage value for PSG. The commenter is referred to Chapter 2, Clarifications and Modifications, pages 2-1 and 2-2 of this Final EIR, which includes the suggested revision to the text referring to and the capacity of PSG.

Response 4-10

The commenter provides a clarification regarding the ownership of HSG and PSG. The commenter is referred to Chapter 2, Clarifications and Modifications, pages 2-1 and 2-2 of this Final EIR, which includes the suggested revision to the text referring to ownership of HSG and PSG.

Response 4-11

The commenter provides a clarification to the number and types of basins at HSG. The commenter is referred to Chapter 2, Clarifications and Modifications, pages 2-1, 2-2, and 2-3 of this Final EIR, which includes the suggested revisions to the text referring to the basins at HSG.

Response 4-12

The commenter provides a clarification regarding the use the spreading grounds. The commenter is referred to Chapter 2, Clarifications and Modifications, page 2-1 of this Final EIR, which includes the suggested text revisions referring to the role of LACDPW in the use of HSG and PSG.

Response 4-13

The commenter requests clarification whether one spreading grounds (i.e., HSG or PSG) could be supplied with the entire daily volume of purified water produced at the AWPF if the other spreading grounds was unavailable. As discussed on page 2-33 of the Draft EIR, the AWPF would be capable of producing about 35 million gallons per day (mgd) of purified water. A smaller portion of this water would go towards the non-potable reuse (NPR) functions, while the balance would be supplied to the spreading grounds for groundwater replenishment. Depending on NPR demand on any given day, up to 35 mgd could be supplied to the spreading grounds. Generally, each spreading grounds has sufficient capacity to accommodate this volume of purified water, and it is anticipated that on a daily basis, the purified water would be supplied to only one spreading grounds. Therefore, if one spreading grounds was unavailable, all the water produced at the AWPF could be supplied to the remaining spreading grounds, assuming it was available. However, as discussed on page 2-33 of the Draft EIR, production of purified water at the AWPF would be curtailed if neither spreading grounds were available due to stormwater capture or other circumstances.

Response 4-14

The commenter requests that the EIR address potential impacts from liquefaction related to increased groundwater replenishment (GWR) at the spreading grounds. The Draft EIR references the maximum capacities at HSG and PSG, which have been established with consideration of the geologic conditions at these spreading grounds and the surrounding areas, including liquefaction potential. As stated on page 3.10-6 of the Draft EIR in Section 3.6, Geology and Soils:

> As discussed above, the Proposed Project involves spreading of purified recycled water to HSG and PSG for a total of an additional 30,000 AFY combined for both spreading grounds. To achieve 30,000 AFY of GWR , it is necessary to spread the purified water produced by the Proposed Project at PSG in addition to HSG. Spreading at HSG beyond the its maximum limit of 35,000 AFY could contribute to increased groundwater levels, which can create potential impacts at nearby facilities such as flooding, slope failure in adjacent gravel quarries and groundwater mounding beneath the Bradley Landfill, which could lead to water intrusion into the landfill containment systems and the generation of leachates. However, it is anticipated that about 15,000 AFY of purified water would be spread at each spreading grounds, but up to 19,000 AFY could be spread at HSG and up to 23,000 AFY at PSG. Therefore, impacts related to unstable soils at the spreading grounds would be less than significant.

Response 4-15

The commenter notes that less than 35,000 AFY of spreading at HSG (the maximum limit of spreading from all sources indicated in the Draft EIR) can potentially create issues related to increased groundwater levels in the area. The annual spreading capacities for HSG noted in the Draft EIR were identified through consultation with LACDPW. As discussed in Section 3.6, Geology and Soils, page 3.6-5 of the Draft EIR, only up to 19,000 AFY of purified water [from the Proposed Project] could be spread at HSG based on the capacity of the spreading grounds and in consideration of other sources of spreading (e.g., stormwater capture). This 19,000 AFY represents a maximum contribution from the Project, while it is estimated that an average of about 15,000 AFY would be contributed. Nonetheless, as discussed in Chapter 2, Description of the Proposed Project, on page 2-33 of the Draft EIR, the projected amount of purified water produced at the AWPF (and therefore the amount spread at the spreading grounds) is a long-term average considered for planning purposes. As discussed on page 2-33, the operations of the AWPF would be curtailed in relation to other spreading activity at the spreading grounds, which may limit the amount of purified water that could be spread. 35,000 AFY is not considered a threshold for spreading, depending on conditions in a given year. Regardless of any stated average projections, a critical factor in relation to the curtailment at any given time in the production and spreading of purified water would include the monitoring of groundwater levels in the area of the spreading grounds to minimize mounding and intrusion.

Response 4-16

The commenter inquires whether the purified water produced by the Project would be stabilized prior to delivery to the spreading grounds to prevent negative interactions with the groundwater and geology, including leaching of minerals or metals or affecting clay lenses.

Purified water that has undergone microfiltration and reverse osmosis treatment is very low in mineral content and therefore has a corrosive nature. Typically, purified water is rebalanced after it has undergone advanced treatment to prevent the leaching of minerals from and the corrosion of recycled water transmission pipelines. This has been the practice of the Orange County Water District, which adds small quantities of minerals (usually lime) to purified water to prevent the degradation of concrete transmission pipes. A similar practice would be followed relative to the purified water produced by the Project to protect the cement mortar lining of the recycled water pipes.

However, in a situation similar to that referred to in the comment, even with the addition of the lime to the purified water in Orange County, it was determined that the mineral content of the water was still so low that it was leaching calcium and magnesium from a clay layer in the aquifer as it percolated into the groundwater basin, and trace amounts of arsenic were carried along with the calcium and magnesium. The addition of more lime has brought the treated water into equilibrium with the clay layer and limited the amount of leaching. This phenomenon was not anticipated and perhaps not predictable, and it was discovered only by routinely and closely monitoring groundwater quality. While it is not anticipated that a similar situation would arise relative to the replenishment of the San Fernando Basin with the Proposed Project's purified water, a comparable level of monitoring of groundwater quality as occurs in Orange County would be conducted regularly during Project operation, and the necessary adjustment to the mineral or other content of the purified water would be made to limit potential issues.

Response 4-17

The commenter provides a clarification to the frequency of basin maintenance activities. The commenter is referred to Chapter 2, Clarifications and Modifications, page 2-2 of this Final EIR, which includes the suggested revisions to the text referring to basin maintenance activities.

Response 4-18

The commenter states that continuous recharge at LACDPW facilities leads to the creation of groundwater mounding regardless of the type of water used. The statement in Section 3.9, Hydrology, Water Quality, and Groundwater, on page 3.9-9 regarding the percolation rate of groundwater is in comparison to that of stormwater. As purified water is lower in suspended solids and turbidity than stormwater, which has been noted to slow percolation rates, the Draft EIR concludes that groundwater recharge using purified water provided by the Proposed Project would not cause a significant decline in percolation rates. Furthermore, as discussed in several locations in the Draft EIR (e.g., page 3.6-10, page 3.9-7, page 3.9-24), the spreading of purified water at the spreading grounds would be managed to limit potential impacts related to increased groundwater levels, including the minimization of groundwater mounding.

Response 4-19

The commenter provides a clarification regarding groundwater depth at HSG. The commenter is referred to Chapter 2, Clarifications and Modifications, page 2-3 of this Final EIR, which includes the suggested revisions.

Response 4-20

The commenter provides a clarification regarding the purpose of Pacoima, Big Tujunga, and Hansen dams. However, the description in the Draft EIR relative to Pacoima and Big Tujunga

dams does not appear to conflict with the information provided in the comment. That is, according to the Draft EIR, the dams are utilized to regulate storm flows (i.e., for flood control) and also to allow recapture of a portion of the downstream flow in spreading basins (i.e., water conservation if flood control is not an issue in a given storm). Relative to the comment that Hansen Dam is used only for flood control, the data provided on the LACDPW website for County-owned spreading facilities states that HSG receives controlled flows from Hansen Dam, which is consistent with the information provided in the Drat EIR.

Response 4-21

The commenter refers to a previous comment regarding the available capacity in HSG and PSG for groundwater replenishment in a given year. Please refer to Response 4-8 above regarding available capacity for groundwater recharge at HSG and PSG depending on various factors.

Response 4-22

The commenter provides a clarification regarding the facilities from which LACDPW releases storm flows and the times that such releases may take place, which may limit the available capacity in the HSG and PSG to accept purified water for replenishment. The commenter is referred to Chapter 2, Clarifications and Modifications, page 2-3 of this Final EIR, which includes the suggested clarification.

Response 4-23

The commenter indicates that the projected days available for spreading purified water at the spreading grounds, as discussed on page 3.9-25 of the Draft EIR, should be considered estimates only. Please refer to page 2-33 of the Draft EIR, which provides a discussion of the projected production capacity of the AWPF and the anticipated level of spreading that would be achieved at HSG and PSG for groundwater replenishment. All of these quantities are presented as estimates and long-term averages. Therefore, it is understood that actual availability for spreading of purified water at HSG and PSG during any given time may be limited and strictly controlled, in which case, the operation of the AWPF would be curtailed, as described in the Draft EIR.

Response 4-24

The commenter provides a clarification regarding the use the spreading grounds. The commenter is referred to Chapter 2, Clarifications and Modifications, page 2-3 of this Final EIR, which includes the suggested text revisions.

From: homeowners-encino@sbcglobal.net
Sent: Sunday, June 12, 2016 4:11 PM
To: City Clerk Wolcott; Tew, Anthony
Cc: Renee Weitzer; David Ryu; Sarah Dusseault; Andy Shrader; Faisal Alserri; Joan Pelico; Paul Koretz; Shawn Bayliss; Gurmet Khara; Cara Goldman; Tom Henry; Jeffrey Ebenstein
Subject: RESPONSE TO (DEIR) GROUNDWATER REPLENISHMENT PROJECT (GWR)

HOMEOWNERS OF ENCINO
"Serving the Homeowners of Encino since 1983"

GERALD A. SILVER
President
PO Box 260064
Encino, CA 91426
Phone (818)990-2757

June 13, 2016

Anthony Tew, P.E.
Water Recycling Policy Group
LADWP Water Resources Section
433 E. Temple St., Bldg 5, Room 103
Work: (213) 367-0880
FAX: (213) 367-6661
anthony.tew@ladwp.com
www.ladwp.com/RecycledWater

Comment closes: July 11, 2016

RESPONSE TO DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
LOS ANGELES GROUNDWATER REPLENISHMENT PROJECT (GWR)

During the past several decades Homeowners of Encino has expressed many serious concerns about the Los Angeles Groundwater Replenishment Project (GWR). These challenged the public process by which the LADWP has approached the project, as well as concerns about cost factors, reliability, security, practicality and health issues of the GWR process. While we believe that "toilet to tap" water may be safe to drink, there are many reasons why we do not support the GWR project. Based on the concerns expressed below, Homeowners of Encino cannot support the GWR project in its present form, nor agree with the findings in the DEIR.

5-1

I. HOMEOWNERS OF ENCINO, INC.

Homeowners of Encino is a California non-profit corporation duly organized and existing under the laws of the State of California. Homeowners of Encino is a public benefit association organized for the purpose of promoting social welfare. This corporation seeks to protect the residential character of its neighborhoods and to enhance the quality of life for its members and the community. Many of its members reside within the neighborhood of the proposed project, and will be heavily impacted by it.

II. SUMMARY OF PROPOSED GWR PROJECT

The Donald C. Tillman Water Reclamation Plant (Tillman Plant) is located at 6100 Woodley Avenue within the Sepulveda Basin, which is owned and managed by the United States Army Corps of Engineers for the purposes of flood control, recreation opportunities, natural resources preservation and enhancement.

Under the Proposed Project, an Advance Water Purification Facility would be constructed within the Tillman Plant to purify the tertiary treated recycled water produced by the existing Tillman Plant facilities. The purified recycled water would be conveyed to the spreading grounds using the existing East Valley Recycled Water Line that currently connects the Balboa Pump Station at the Tillman Plant to the Hansen Spreading Grounds and the Hansen Storage Tank. 5-2

A new 42-inch-diameter pipeline branch would be constructed from the existing East Valley Recycled Water Line to the Pacoima Spreading Grounds. The segment of pipeline within Arleta Avenue would be approximately 11,000 feet long. LADWP could recharge up to 19,000 AFY of purified water at Hansen Spreading Grounds, and up to 23,000 AFY of purified water at Pacoima Spreading Grounds, based on the availability of supply and the annual capacity of both spreading grounds. The LADWP estimates that an average of 15,000 AFY of purified water would be recharged to achieve a total of 30,000 AFY.

III. THE DEIR IS BASED UPON FLAWED FINDINGS

The Proposed Project would create significant impacts during construction to air quality, biological resources, cultural resources, noise, and transportation and traffic, requiring mitigation measures to reduce the impacts to a less than significant level. It is unclear whether the specific mitigation measures that have been identified will actually reduce these impacts to a less than significant level including noise and traffic.

Homeowner of Encino has raised concerns about the proposed "toilet to tap" water recycling project from its inception. While in the end the reclaimed water will likely be safe to drink, there are many critical issues that go unaddressed. These include: 5-3

1. There is no certainty that the system will work over the long haul. We are not convinced that the system will work effectively to filter out contaminates over many decades.

2. The project was not given adequate public notice, and too few people were involved in environmental process and hearings, as well as the current DEIR efforts. 5-4

3. There is no backup plan proposed to replace the water created by this system. This could mean that residents/businesses relying upon to the new recycled water supply could be left without a water source in the event the system did not work in the long run. 5-5

4. The LADWP should be put the entire “toilet-to-tap” matter up to a vote by the ratepayers. If residents want to consume recycled water, then so be it, but this should not be a unilateral decision made only by the LADWP. 5-6

5. The cost of recycled water is much higher than other sources, and it is unfair to saddle Los Angeles water users with this higher cost. 5-7

6. The "new source" of water will ultimately lead to more development and more growth than the rest of the infrastructure can support. The growth inducing impacts are not adequately addressed. 5-8

7. The Valley contains numerous hospitals that feed into the Tillman Reclamation plant. This makes the Valley "toilet to tap" system different than other communities, and requires special consideration. 5-9

Homeowners of Encino cannot support the proposed GWR project and the DEIR based upon cost factors, reliability, safety, practicality, cost and growth inducing issues. 5-10

Cordially yours,

Gerald A. Silver

GERALD A. SILVER
President, Homeowners of Encino

Cc: Federal, State and Local Officials

Comment Letter 5: Homeowners of Encino

Response 5-1

This comment includes introductory remarks and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft Environmental Impact Report (EIR). Therefore, no further response to this comment is provided.

Response 5-2

The commenter provides a summary of the Project. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. Therefore, no further response to this comment is provided. It should be noted that the Draft EIR indicates that it is estimated that an average of 15,000 acre-feet per year (AFY) of purified water would be recharged at each of the spreading grounds (i.e., Hansen Spreading Grounds [HSG] and Pacoima Spreading Grounds [PSG]) for up to 30,000 AFY.

Response 5-3

The commenter asserts that there is no certainty that that the water purification system would work over the long haul. The advanced water purification process is described in Chapter 2, Description of the Proposed Project, Section 2.7.1, Advanced Water Purification Process, on page 2-32 of the Draft EIR. As discussed, the tertiary-treated recycled water produced at Donald C. Tillman Water Reclamation Plant [DCTWRP] would go through further treatment through the proposed Advanced Water Purification Facilities (AWPF) to create purified water. The AWPF treatment process would include ozonation, biologically activated carbon (BAC), multiple-barrier filtration (e.g., microfiltration [MF] and reverse osmosis [RO]), and/or advanced oxidation processes (AOP). As described in section 2.7.1 of the Draft EIR, ozonation and BAC serve to reduce pathogens; MF removes smaller suspended solids than does the tertiary filtration at DCTWRP and provides an additional barrier to microorganisms; the RO process removes bacteria, viruses, dissolved organic matter, and salts from liquids; and AOP provides disinfection and inactivation of pathogenic microorganisms that are difficult to degrade biologically and for disinfection of organic chemicals that may be present in the water. Following these advanced treatment processes, the purified recycled water would be conveyed to HSG and PSG for spreading.

As discussed in Section 3.9, Hydrology, Water Quality, and Groundwater, page 3.9-22 of the Draft EIR, the Los Angeles Department of Water and Power (LADWP) and the Los Angeles Department of Public Works Bureau of Sanitation (LASAN) performed a 16-month pilot study from February 2010 to June 2011 to test the advanced treatment processes at DCTWRP, including the MF, RO, and AOP processes proposed for the Project presented in the Draft EIR. The purpose of the pilot study was to evaluate the treatment efficacy of using advanced water purification processes on DCTWRP recycled water. As stated on page 3.9-22 of the Draft EIR, "water quality results from the pilot testing confirmed that all existing and draft drinking water and recycled water regulations can be met using the proposed treatment processes. All of the regulated compounds had average and maximum values in the product water below regulatory limits. No significant health risks have been suggested for these compounds at these concentrations. It was concluded that the advanced water purification processes tested at DCTWRP provided an exceptional water quality for use in groundwater replenishment and exceeds drinking water quality standards. These advanced treatment processes would provide water that meets and exceeds the standards in Title 22, Article 5.1 for Indirect Potable Reuse:

Groundwater Replenishment – Surface Application." In addition, similar systems have been in operation throughout the world for many years, including the Groundwater Replenishment System operated by the Orange County Water District, which came online in January 2008 and currently produces up to 100 million gallons a day, enough to serve about 850,000 residents.

Furthermore, as discussed on page 3.9-23 of the Draft EIR, the quality of the water produced from the proposed AWPF would require ongoing sampling and testing to ensure that it meets, and continues to meet, applicable regulations and requirements for groundwater recharge. It is anticipated that the quality of the treated water would be of a higher quality than the water in the receiving aquifer. Therefore, the Draft EIR concludes that long-term, beneficial impacts to groundwater quality are anticipated with implementation of the Proposed Project. The commenter presents no evidence to the contrary.

Response 5-4

The commenter contends that adequate public notice regarding the project was not given and that too few people were involved in the environmental process. The environmental review process for the Proposed Project is described in Chapter 1, Introduction, section 1.3, CEQA Environmental Process, beginning on page 1-3 of this Final EIR. As discussed in Section 1.3, pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15082, a Notice of Preparation (NOP) of an EIR, including an Initial Study of potential environmental impacts, was prepared and circulated on September 6, 2013, to public agencies, interested organizations, and the general public. The purpose of the NOP was to provide notification that LADWP planned to prepare and EIR for the Proposed Project and to solicit input on the scope and content of the EIR. The NOP was distributed to approximately 47 agencies, organizations, and other interested parties. Additionally, three public meetings were held during the NOP review period on September 25, October 3, and October 12, 2013. The purpose of these meetings was to seek input from public agencies, organizations, and the general public regarding the environmental issues and concerns related to implementation of the Proposed Project. Thus, the public was given the opportunity to provide input on the scope and content of the EIR during the NOP review period in accordance with the CEQA Guidelines.

The Draft EIR was circulated for public review and comment beginning on May 12, 2016. CEQA Guidelines Section 15087(a) discusses the noticing requirements for public review of a Draft EIR, stating:

> "Notice shall be mailed to the last known name and address of all organizations and individuals who have previously requested such notice in writing, and shall also be given by at least one of the following procedures:
>
> (1) Publication at least one time by the public agency in a newspaper of general circulation in the area affected by the proposed project. If more than one area is affected, the notice shall be published in the newspaper of largest circulation from among the newspapers of general circulation in those areas.
>
> (2) Posting of notice by the public agency on and off the site in the area where the project is to be located.
>
> (3) Direct mailing to the owners and occupants of property contiguous to the parcel or parcels on which the project is located. Owners of such property shall be identified as shown on the latest equalized assessment roll.

Copies of the Draft EIR and the Notice of Availability (NOA) were distributed to all agencies, organizations, and individuals who commented on the NOP. The NOA was provided in both English and Spanish translations. A copy of the NOA was also published in the May 12, 2016 edition of the Los Angeles Times newspaper. The distribution of the NOA included approximately 47 relevant agencies and organizations, approximately 15 individuals who previously requested to receive notices on the Project, and over 430 owners and occupants of property adjacent to the project site. As such, the NOA was mailed to all agencies, organizations, and individuals who previously requested notice; the notice was published in the newspaper of largest circulation in the project vicinity; and the notice was directly mailed to owners and occupants of property contiguous to the parcels on which the project is located, thus fulfilling the public noticing requirements pursuant to CEQA Guidelines Section 15087(a).

Pursuant to CEQA Guidelines Section 15105, CEQA requires that the public review period for a Draft EIR be no less than 30 days and no longer than 60 days except under unusual circumstances. When a project is submitted to the State Clearinghouse for review by state agencies, the public review period should be no less than 45 days unless a shorter period, not less than 30 days, is approved by the State Clearinghouse. As the Draft EIR was sent to the State Clearinghouse for review, a 45-day review period was required. The Draft EIR was available for public review from May 12, 2016 through July 11, 2016, a period of 60 days. This extended the required 45-day review period by 15 days in order to allow for additional review time due to the occurrence of two national holidays coinciding with the review timeframe for the Draft EIR. Thus, the public review period for the Draft EIR was consistent with the public review requirements under CEQA. Additionally, a public meeting was held during the Draft EIR public review period, on June 14, 2016, to solicit comments from interested parties on the content and environmental analysis in the Draft EIR.

As shown in the Project history described above, notices have been distributed to the public pursuant to the CEQA Guidelines, and the public has been afforded multiple opportunities to provide input throughout the environmental review process for the Proposed Project.

In addition, it should be noted that LADWP and the Los Angeles Department of Public Works Bureau of Sanitation (LASAN) have conducted an extensive public outreach program to promote the advantages and safety of recycled water use. In addition to providing literature and promotional material, LADWP and LASAN have been involved with nearly 300 separate outreach events over the last three fiscal years, ending in June 2016. These have included presentations, public meetings, facility tours, demonstrations, open houses, and conferences involving such groups as elementary, middle, and high schools; universities; City and Neighborhood Council representatives; residential associations; community, service, business, and professional organizations; and environmental advocacy organizations. LADWP and LASAN were instrumental in the formation of the Recycled Water Advisory Group (RWAG), which included 74 member organizations as of 2016, including the Encino Neighborhood Council and the Homeowners of Encino. As of June 2016, RWAG has also been integrated into the One Water LA Stakeholder Group to broaden its scope and outreach.

Response 5-5

The commenter states that there is no backup plan to replace the water created by the Proposed Project should the system fail. This comment is based on the supposition that the proposed Advanced Water Purification Facilities would not function in the long run. Please see Response 5-3 regarding the effectiveness and reliability of the proposed system. Furthermore, the purpose of the Proposed Project is to increase the reliability and sustainability of the City's

water supply in the face of increasingly less dependable imported water supplies. As stated on pages 1-1 and 1-2 of the Draft EIR:

> In response to these challenges related to traditional imported water supplies, the City has embarked upon an aggressive effort to maintain reliable and sustainable sources of water. Long-term strategies outlined in the 2010 Los Angeles Urban Water Management Plan (UWMP) intended to "meet the City's water needs while maximizing local resources and minimizing the need to import water" include increasing water conservation, increasing water recycling, enhancing stormwater capture, and accelerating groundwater cleanup. These strategies are not alternative means to achieve local water supply goals but are complementary and mutually inclusive...The Proposed Project presented in this Draft EIR is an outcome of this planning process and reflects policies to reduce reliance on imported water, increase the use of recycled water, and replenish the groundwater basin in order to maintain a sustainable, safe, and reliable supply of potable water to meet the needs of the City of Los Angeles.

Response 5-6

The commenter contends that LADWP ratepayers should be able to vote on whether recycled water is used for groundwater recharge rather than it being a "unilateral" decision of LADWP. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR.

In addition, LADWP has no authority to place measures on the ballot. Furthermore, the Proposed Project is not a unilateral decision of LADWP but, as discussed in Response 5-5, is a component of the approved UWMP, which is mandated by the State of California and is reflective of State guidelines relative to the use of recycled water. The UWMP represents a broad set of policies and programs undertaken by the City to provide for the efficient use of resources to meet the City's demand for water. The UWMP involves the participation of numerous agencies and facilitates the City's goal, in accordance with State legislation, to provide reliable and sustainable water supplies to customers over the 25-year timeframe of the plan.

Response 5-7

The commenter questions the cost-effectiveness of the Proposed Project. Please refer to Response 5-5 above, which explains that dependence on imported water by the City is increasingly costly as well as increasingly less reliable. As discussed in Chapter 2, Description of the Proposed Project, page 2-3 of the Draft EIR, groundwater recharge has been determined to be a cost effective option to delivering recycled water under the Recycled Water Master Plan (RWMP). Additionally, as discussed on page 2-17 of the Draft EIR, although one set of advanced treatment processes have been identified and evaluated in the EIR, other purification processes and technologies will be evaluated during pilot testing for efficiency and cost effectiveness and remain under consideration for the AWPF. Thus, cost-effectiveness has been considered in the development and implementation of the Proposed Project.

Response 5-8

The commenter asserts that the water produced by the Proposed Project would lead to growth and development that infrastructure could not support. As discussed throughout the Draft EIR,

the primary purpose of the Proposed Project is to reduce the City's dependence on imported water sources by increasing the local groundwater supply available for potable use. While it is true that local supplies would be supplemented (that is, increased) by up to 30,000 AFY, the City's overall water supply would not increase since the Project would offset (that is, decrease) imported supplies by a like amount. As described in Chapter 4, Impact Overview, section 4.4, Growth-Inducing Impacts, beginning on page 4-10 of the Draft EIR, induced growth is any growth that exceeds planned growth and results from new development that would not have taken place without the Proposed Project. Typically, growth-inducing potential of a project is considered significant if it exceeds the assumptions included in pertinent master plans, land use plans, or projections made by regional planning authorities. As a component of the Urban Water Management Plan (UWMP), the Proposed Project would serve to accommodate the natural growth in population anticipated in the LADWP service area over the next 25 years as projected by adopted planning documents. As such, the Proposed Project would accommodate planned growth, it would not induce this growth and, therefore, would not stimulate development.

Response 5-9

The commenter states that numerous hospitals feed into DCTWRP, which requires special consideration. The commenter is referred to Response 5-3 above regarding the advanced treatment processes proposed to be implemented by the Proposed Project, the efficacy of such treatment processes, and the ongoing sampling and testing of water quality that would be required during Project operation.

Response 5-10

The comment includes closing remarks summarizing the position of the Homeowners of Encino based on the issues raised in the above comments. The commenter is referred to Responses 5-1 through 5-9 above.

(2)

Comment Letter No. 6

SPEAKER/COMMENT CARD

LOS ANGELES GROUNDWATER REPLENISHMENT PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT
PUBLIC MEETING
June 14, 2016
Sepulveda Garden Center

Nadia Parker
Los Angeles Department of Water and Power
111 North Hope Street, Room 1050
Los Angeles, CA 90012
E-Mail: Nadia.Parker@ladwp.com

Please check the appropriate box below:

☒ **I wish to speak at the Public Meeting**

☐ **I have provided my comments on this sheet**

Name: Arthur Pugsley

Organization: Los Angeles Waterkeeper

Address: 120 Broadway Suite 105 Santa Monica CA 90401

E-mail: arthur@lawaterkeeper.org

COMMENTS ***(Please print legibly)***:

will send follow-up letter by deadline;
will read a few preliminary comments into
the administrative record this evening.

6-1

Please use the back of this page if needed.

Comment Letter 6: Los Angeles Waterkeeper 1

Response 6-1

The commenter indicates that they would be submitting a follow-up letter in addition to their preliminary comments, which were made at the public meeting for the Draft Environmental Impact Report (EIR) on June 14, 2016 (see pages 3-92 through 3-110 below for the content of and response to the oral comments received at this meeting). This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. Therefore, no further response to this comment is provided.

LOS ANGELES WATERKEEPER®

July 6, 2016

Via email to Nadia.Parker@ladwp.com

Los Angeles Department of Water and Power
111 North Hope Street, Room 1050
Los Angeles, CA 90012
Attn: Nadia Parker

Re: Comments on Draft Environmental Impact Report for the Los Angeles Groundwater Replenishment Project

Dear Ms. Parker,

Los Angeles Waterkeeper (LAW) respectfully submits the following comments on the Draft Environmental Impact Report (DEIR) for the Los Angeles Groundwater Replenishment Project (Project).

LAW is a nonprofit environmental organization with over 3,000 members dedicated to protecting and restoring all waterways in Los Angeles County and ensuring an environmentally and socially sustainable water supply. LAW advocates the "4R" approach to Integrated Water Management: reduce use of water through conservation with a goal of 50/gallons/person/day; reuse greywater and capture stormwater; recycle through wastewater reclamation; and restore watershed health both in source areas of water supply and in the increasingly important aquifer underlying large sections of the San Fernando Valley. 7-1

The commitment to provide 30,000 acre feet per year of purified recycled water from the Donald C. Tillman Water Reclamation Plant for infiltration at two spreading grounds is the largest commitment to date to water recycling in the City of Los Angeles. LAW is very supportive of the Project and commends the Los Angeles Department of Water and Power and Sanitation Bureau for advancing the City of Los Angeles' goals of reducing reliance on imported water.

At the same time, continuing to provide adequate base flows for the nearby lakes and the Los Angeles River is important. The DEIR commits to maintaining a base flow of 27 million gallons per day to maintain riparian habitat. While 27 mgd appears appropriate in current conditions, the maintenance of riparian functions and habitat is the ultimate goal, and LAW recommends periodically revisiting the base flow rate (tied to a recurring event such as MS4 permit renewal) to ensure ecological adequacy of base flow rates. 7-2

Although LAW would have preferred using water from the Hyperion Treatment Plant as the source for the Project's water recycling in order to reuse water that is otherwise wasted by discharge from an outfall pipe into Santa Monica Bay, LAW understands the constraints that led to the selection of Tillman water as the source for the project. Nevertheless, LAW reiterates that continued ocean discharge of treated sewage from Hyperion is not an element of a sustainable 7-3

approach to Integrated Water Management over the long term. 7-3 Cont'd

LAW requests that the following concerns be addressed in the Final Environmental Impact Report:

1. Existing Conditions of San Fernando Groundwater Basin

The DEIR states that the Hansen Spreading Grounds and Pacoima Spreading Grounds are located in the eastern part of the San Fernando Groundwater Basin. The DEIR further explains that groundwater in certain areas in the eastern San Fernando Basin are not within the recommended limits of California Drinking Water Standards, but that the groundwater is either being treated or blended after pumping to meet CA Drinking Water Standards, or the groundwater is not being pumped at all due to the temporary removal of the impacted wells. Since the Project's purified recycled water will ultimately be mixed with the existing groundwater in eastern parts of the San Fernando Basin, the Final EIR should examine the potential for the purified recycled water to become contaminated by the existing conditions of the San Fernando Basin, and the extent to which any such contamination may compromise the goals of the Project. To the extent that remediation efforts are planned or are currently underway, the Final EIR should discuss those measures as well. 7-4

2. Purity Level of Recycled Water

LAW suggests that the Final EIR examine potential issues with the passage of the purified recycled water through the soils of the San Fernando Basin. Specifically, the Final EIR should address whether the purity level of the recycled water could trigger the release of any contaminants in the ground into the groundwater and thus compromise the quality of the groundwater. For example, a study[1] by Stanford researchers found that the purified recycled water in Orange County's groundwater replenishment system was so pure that when introduced into the groundwater basin, it caused existing arsenic in the clay sediment to escape and infiltrate the groundwater. The researchers recommended adding mineral content to the purified recycled water to reduce the release of arsenic. Thus, it is advisable that the Final EIR discuss the potential for the purified recycled water to interact with soils in unfavorable ways, and if necessary, mitigation measures to reduce the impact. 7-5

3. Public Outreach and Education

An essential component of a sustainable water supply future is public acceptance of recycled water for potable use. From the public meeting on the DEIR, it appears misinformation is currently not in short supply. It is thus important that the public be adequately informed of the benefits of water recycling to build support for such efforts. LAW recommends that the Final EIR include an education and outreach plan to provide key information about the Project in a manner reasonably designed to reach members of the community. 7-6

LAW will continue its advocacy and outreach efforts in support of a "4R" approach to 7-7

[1] Fakhreddine et al. "Geochemical Triggers of Arsenic Mobilization during Managed Aquifer Recharge." *Environmental Science and Technology* 49 (2015): 7802-7809. http://pubs.acs.org/doi/abs/10.1021/acs.est.5b01140.

Integrated Water Management, and will continue to participate in the "OneWater LA" initiative

7-7
Cont'd

Thank you for the opportunity to provide comments on the DEIR for the Los Angeles Groundwater Replenishment Project.

Sincerely,

Arthur Pugsley
Senior Attorney

Comment Letter 7: Los Angeles Waterkeeper 2

Response 7-1

The commenter provides general introductory remarks about the Los Angeles Waterkeeper (LAW), its purpose, and its "4R" philosophy to integrated water management (reduce, reuse, recycle, and restore). The commenter expresses support for the project and commends the Los Angeles Department of Water and Power (LADWP) and the Los Angeles Department of Public Works Bureau of Sanitation (LASAN) for the goal of reducing reliance on imported water. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft Environmental Impact Report (EIR). Therefore, no further response to this comment is provided.

Response 7-2

The commenter notes that after Project implementation, a flow of 27 million gallons per day (mgd) would be maintained to the various lakes within the Sepulveda Basin and the Los Angeles River. However, it should be noted that the Draft EIR indicates that an annual average of approximately 27 mgd would be provided rather than 27 million gallons on a daily basis.

The commenter also states that while the 27 mgd flow appears sufficient to support habitat, this flow should periodically be reevaluated to determine if it is adequately maintaining riparian habitat. As noted in the Draft EIR, the 27 mgd annual average was based on existing flow conditions, and its adequacy has been established in past analyses. As stated in Chapter 2, Description of the Proposed Project, page 2-33 of the Draft EIR:

> An annual average of approximately 27 mgd is [currently] provided to various lakes within the Sepulveda Basin and the Los Angeles River, and after Project implementation, a minimum annual average of 27 mgd of the tertiary-treated recycled water would continue to be provided to the lakes and the river from DCTWRP [Donald C. Tillman Water Reclamation Plant]. All Alternatives considered in the 2006 Draft EIR for the City's Integrated Resources Plan (IRP) for wastewater, runoff, and recycled water programs assume an annual average of 27 mgd would be discharged from DCTWRP to the Los Angeles River through Lake Balboa, the Wildlife Lake, and the Japanese Garden lake. This volume of flow is consistent with "Go-Policy" #5 (Los Angeles River Flows) from the 2012 City of Los Angeles Water IRP 5-Year Review, which directs the City "to continue to provide water from DCT to Lake Balboa, Wildlife Lake, and the Japanese Garden at Sepulveda Basin, and the LA River to meet baseline needs for habitat (i.e., approximately 27 mgd through flow-through lakes)." The IRP 5-Year Review concluded that this policy "is valid and in line with LARRMP [Los Angeles River Revitalization Master Plan] considerations [for water quality, ecological function, and habitat value], provided that water discharged from DCTWRP continues to meet state and federal water quality mandates and that an average of 27 mgd (approximately 30,000 AFY [acre-feet per year]) from DCTWRP is supplied to the Los Angeles River."

Therefore, as concluded in Section 3.4, Biological Resources, on page 3.4-19 of the Draft EIR:

> [A]fter Project implementation, a minimum annual average of 27 mgd would continue to be provided to the lakes and the river from DCTWRP. Therefore, the

> Project, which would utilize the available unused treatment capacity of DCTWRP to provide recycled water for the advanced water purification processes, would not result in a change in discharge to the river, and no impacts to the river's biological resources and function as a wildlife movement corridor would occur from operation of the onsite components.

As stated, the Proposed Project would result in no change from the existing baseline flow and would create no impact to the habitat of the lakes and rivers. Therefore, periodic monitoring of the adequacy of the 27-mgd flow would not be a requirement of the Project since the flow would remain the same with or without Project implementation.

Response 7-3

The commenter indicates an understanding of the reasons DCTWRP has been identified as the source of wastewater for the Proposed Project. However, the commenter also expresses the opinion that the continued discharge of treated wastewater to the Santa Monica Bay from Hyperion Treatment Plant is not sustainable over the long term. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. Therefore, no further response to this comment is provided.

Response 7-4

The commenter requests that the issue of groundwater contamination and its potential effect on the goals of the Project be addressed in the Final EIR. As discussed in the Draft EIR, the City of Los Angeles is pursuing a number of parallel strategies to achieve its goals of increasing local water supplies and decreasing imported water supplies. As stated in Chapter 1, Introduction, on page 1-1 of the Draft EIR:

> In response to these challenges related to traditional imported water supplies, the City has embarked upon an aggressive effort to maintain reliable and sustainable sources of water. Long-term strategies outlined in the 2010 Los Angeles Urban Water Management Plan (UWMP) intended to "meet the City's water needs while maximizing local resources and minimizing the need to import water" include increasing water conservation, increasing water recycling, enhancing stormwater capture, and accelerating groundwater cleanup.

Therefore, it is recognized by the City that in order to achieve the desired level of local water supply (meeting 50 percent of total demand by 2035), it will require not only conservation and increasing groundwater recharge via stormwater capture and replenishment with purified recycled water, but treatment to remove contamination from the San Fernando Groundwater Basin (SFB) to restore its beneficial use as a drinking water aquifer. As mentioned in Chapter 5, Alternatives to the Proposed Project, on pages 5-2 through 5-3 of the Draft EIR, these various program elements (i.e., conservation, stormwater capture, groundwater replenishment, and groundwater cleanup) are not alternative means to achieve the local water supply goals but are complementary and mutually inclusive as components of the integrated approach identified in the UWMP.

With respect to existing groundwater contamination, LADWP has initiated the analysis of individual response actions, consistent with the National Contingency Plan, to respond to existing contaminant releases in groundwater that affect certain wells in the SFB. These actions supplement the response actions being overseen by the U.S. Environmental Protection Agency

and the Regional Water Quality Control Board, Los Angeles Region. LADWP anticipates that these response actions will remove contaminant mass, minimize the further spread of the contamination, and treat water to restore LADWP's capability to operate its existing well fields in a manner the fully protects public health and the environment. This would allow for the use for potable purposes of the increased groundwater supplies that would be provided by the Proposed Project.

Response 7-5

The commenter suggests that the Final EIR address the potential for the purified water produced by the Project to release contaminants, such as arsenic, from the aquifer, as occurred in Orange County from groundwater replenishment with purified water. Purified water that has undergone microfiltration and reverse osmosis treatment is very low in mineral content and therefore has a corrosive nature. The Orange County Water District adds small quantities of minerals (usually lime) to rebalance the water that has undergone advanced treatment to prevent the leaching of minerals from, and therefore the degradation of, concrete transmission pipes. A similar practice would be followed relative to the purified water produced by the Project to prevent corrosion of the ductile iron recycled water pipes.

However, even with the addition of the lime to the purified water for this purpose in Orange County, it was determined that the mineral content of the water was still so low that it was leaching calcium and magnesium from a clay layer in the aquifer as it percolated into the groundwater basin, and trace amounts of arsenic were carried along with the calcium and magnesium. The addition of more lime has brought the treated water into equilibrium with the clay layer and limited the amount of leaching. This phenomenon was not anticipated and perhaps not predictable, and it was discovered only by routinely and closely monitoring groundwater quality. While it is not anticipated that a similar situation would arise relative to the replenishment of the SFB with the Project's purified water, a comparable level of monitoring of groundwater quality as occurs in Orange County would be conducted regularly during Project operation, and the necessary adjustment to the mineral or other content of the purified water would be made to limit potential issues.

Response 7-6

The commenter recommends that the Final EIR include a public education and outreach program to provide information about and build support for the use of recycled water and the Proposed Project. As noted in Chapter 1, Introduction, on page 1-3 of the Draft EIR, "The purpose of an EIR is to provide decision makers, public agencies, and the general public with an objective and informational document that fully discloses the environmental effects of a proposed project." As part of the EIR process and in accordance with CEQA, outreach has occurred in the form of public meetings and wide distribution of the EIR documents to gather input from interested parties and communicate the results of the environmental analysis. While public education and outreach are very important to build understanding of and support for the recycled water and groundwater replenishment programs, they are not related to the evaluation of the environmental impacts of the Project and, therefore, would not be included in the Final EIR.

In addition, it should be noted that while disagreements and misconceptions regarding recycled water persist, LADWP and LASAN have conducted an extensive public outreach program to promote the advantages and safety of recycled water use. In addition to providing literature and promotional material, LADWP and LASAN have been involved with nearly 300 separate

outreach events over the last three fiscal years, ending in June 2016. These have included presentations, public meetings, facility tours, demonstrations, open houses, and conferences involving such groups as elementary, middle, and high schools; universities; City and Neighborhood Council representatives; residential associations; community, service, business, and professional organizations; and environmental advocacy organizations. LADWP and LASAN were instrumental in the formation of the Recycled Water Advisory Group (RWAG), which included 74 member organizations as of 2016. As of June 2016, RWAG has also been integrated into the One Water LA Stakeholder Group to broaden its scope and outreach. The recycled water outreach program will continue through Project implementation and once the Project is operational, and would likely expand to include public tours of the Advanced Water Purification Facilities at DCTWRP.

Response 7-7

The commenter indicates that LAW will continue to advocate for the 4R approach to water management and continue to participate in One Water LA. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. Therefore, no further response to this comment is provided.

San Fernando Valley Audubon Society
Incorporated as California Audubon Society 1913
P.O. Box 7769 Van Nuys, CA 91409-7769

"For nature education and the conservation of wildlife"

July 11, 2016

Los Angeles Department of Water and Power
111 No. Hope Street, Room 1050
Los Angeles, CA 90012
Attn. Nadia Parker
Via E-mail to Nadia.Parker@ladwp.com

COMMENTS OF San Fernando Valley Audubon Society Re: Draft Environmental Impact Report, SCH No. 2013091023, Los Angeles Groundwater Replenishment Project

Dear Ms. Parker:

The purpose of this letter is to provide comments from the San Fernando Valley Audubon Society (SFVAS) concerning the Draft Environmental Impact Report (DEIR) on the Ground Water Replenishment Project (GWR) for the City of Los Angeles.

INTRODUCTION

SFVAS, an approximately 1800 member chapter of the National Audubon Society, is a non-profit charitable organization under Section 501c(3) of the Internal Revenue Code. SFVAS has no financial interest one way or another in the Project. 8-1

The SFVAS mission is, in part, to conserve wildlife and their habitats and to engage in related activities to further that mission. These comments are intended to pursue that mission. Two principal concerns are discussed here: 1) the potential impacts of the project on promoting developments in and around the City that impact wildlife and their habitats, and 2) additional consideration of biological resources overlooked in the EIR.

BACKGROUND

Water policy and usage by the City of Los Angeles has profound and widespread impacts for wildlife and their habitats. The City has a long history of sacrificing or simply ignoring these resources in order to promote agriculture, housing, commercial, and industrial developments -- all of which have involved the modification of natural drainages by one means or another and require additional water to sustain them. The various methods used have involved the draining of marsh lands (for example, La Cienaga Wetlands), damming rivers (for example, the Los Angeles River), channeling or diverting rivers and creeks on a 8-2

large scale (for example, Los Angeles River, Tujunga Creek and Wash) or on a smaller scale (Santa Susana Creek, Chatsworth Creek, and virtually every tributary of the Los Angeles River), polluting streams and even groundwater, and converting natural substrates into hard surfaces that impede or completely block infiltration (nearly the entire City, except for a few isolated islands of habitat). This list is by no means exhaustive.

Of course, such impacts are not confined to the city proper. The Owens Valley, Sacramento Delta, Colorado River, and other areas have also been impacted by the unquenchable water needs for development of the City. These impacts, both inside and outside of the city limits have continued more or less unabated. Further discussed below, the Draft Environmental Impact Report (DEIR) fails to admit the certainty that the GWR Project will stimulate, or at least allow for, the continuation of past trends in development patterns on the basis of the perception that water for such developments is not limited. The DEIR is, therefore, deficient in considering the program's impact deriving from such developments.

8-2 Cont'd.

Only in relatively recent years has there been some effort, mostly forced upon the City by court decisions, to find alternative ways of securing water by means of conservation, improvements in storm water capture, and recycling. SFVAS generally supports all of these efforts to continue to provide water for the City's current residents and institutions by reducing reliance on imported water while, at the same time, indirectly reducing the adverse impacts from water projects on wildlife and their habitats. However, that support must be conditioned on the realization that securing additional water supplies by any method will contribute to further development of what's left of the open spaces surrounding the City (see above). These open spaces, especially those in the Santa Susana Mountains, Simi Hills, Verdugo (San Rafael) Hills, and Santa Monica Mountains are prime targets for developers, who seem adept at manipulating facts to create illusions that they can provide water for their developments without impacting the overall water needs of the City and continue to modify drainages in blatant disregard for the needs of wildlife, the sustainability of wildlife corridors, impacts on the Los Angeles River Watershed, and the well-being of the growing constituency of stakeholders. Our purpose here is to call attention to these significant adverse impacts in the hope that some laws, regulations, ordinances, or other mechanisms can be instituted to prevent them from occurring.

LADWP HAS FAILED TO FOLLOW THROUGH ON PREVIOUS COMMITMENTS

In a broad sense, the GWP Project is all about conservation, securing water for the City, and reducing reliance on imported water. These goals must be met within the context of meeting historical commitments and applying rational decision-making to conservation issues. Unfortunately, LADWP has not always met such commitments and has sometimes quietly pursued antagonistic policies while presenting a cooperative face to the public.

8-3

The best current example of this is the failure to maintain the Ecology Pond at Chatsworth Nature Preserve/Reservoir (CNP) in a viable manner to meet historical commitments to provide habitat for waterfowl in the wake of the draining of the reservoir in 1969. Up until last year, DWP was willing (when reminded) to provide supplemental water during the summer months when needed to keep enough water in the pond to support wildlife. That changed as a result of putative efforts to conserve water as a result of the extended drought. Sufficient supplies of supplemental water were discontinued, the pond was allowed to dry up completely, sediments were mechanically removed, fringing marsh

and upland vegetation was destroyed, and the pond was divided in half by a large berm. The consequences of this were that the amount of continuous open water available for waterfowl was decreased, thus discouraging waterfowl usage, large areas of nesting habitat were removed, and promises to provide alternative sources of water for the pond were not met. It should be noted, that, for a time, DWP provided wildlife guzzlers nearby; however, such devices are not useful for maintaining waterfowl populations, and we do not have any evidence currently that the devices have been used by any other wildlife. If they have been used, DWP has not made such information readily available.

8-3 Cont'd.

GROWTH INDUCING IMPACTS

The upshot of the above concerns using CNP as an example is that wildlife, in particular wildlife dependent on a wetland environment, is being made a sacrificial lamb for the benefit of large residential and commercial developments and their promoters. Examples of such developments under construction in and around the San Fernando Valley are Dayton Canyon (Pulte), Deer Lake, Porter Ranch extension, and the Westfield Village complex. Other developments are in the planning stages. Examples are on the Pratt and Whitney Rocketdyne site, Hidden Creeks Estates, Tujunga Canyon Ranch Estates, Andora Estates, and two proposals for the Bell Canyon Area. How is it that the City can approve so many large, water-guzzling developments and claim a need to conserve water by depriving a relatively small wetland of make-up water even when that denial violates past and recent promises? Something is seriously wrong here.

In spite of these obvious contradictions in policy actions, the public is now being asked to trust that DWP and its partners will honor its commitments in a much larger project. We are necessarily skeptical. The fact that other agencies are involved in the Project does not necessarily ameliorate that skepticism. This skepticism relates back to the overriding concern of stimulating development in areas that now support wildlife.

8-4

The critical statements we regard as questionable are contained in Section 4.4, Growth Inducing Impacts, of the DEIR, which reads as follows:

> "The fundamental purpose of the Proposed Project is to *reduce* the City's dependence on imported water sources by increasing the local groundwater supply available for potable use. With Project implementation, imported water would be *offset* by up to 30,000 AFY of purified water through groundwater replenishment, thereby *supplementing the City of Los Angeles' local water supply* and increasing system reliability and sustainability." (Emph. added)

Further on, it is stated "Because the Project is intended to *replace* existing imported supplies, it would not increase overall water supplies to the City in a manner that would induce population growth."

Such conclusions are disingenuous at best. The italicized terms, "reduce," "offset," and "replace," all of which indicate no change or a reduction in overall supply contradict the phrase "supplementing. . . local supply," a phrase which indicates addition to the overall supply. Clearly, any conclusion derived from these words is worthless, as there is no stated commitment to maintain (or reduce) water supply levels after the completion of the Project at

the same (or reduced) levels prior to the initiation of the Project. **Therefore, some modifications in the wording of the DEIR relevant to these issues are needed to clarify the intent of the Project.**

If the intent of the project is to reduce, offset, or replace imported water that should be unambiguously and consistently stated. Under such conditions, SFVAS can conditionally support the Project provided that there is a coincident program of rules, regulations, or ordinances that would limit growth that impinges on remaining open spaces. Conversely, if the intent of the project is to supplement existing supplies, that should be unambiguously and consistently stated. Because such a policy would play into the hands of developers that would further usurp open spaces, SFVAS would likely oppose the Project, in spite of other possible benefits.

Additional credence to the above argument can be found in Table 3.10-1, a portion of which is copied below.

8-4 Cont'd.

Table 3.10-1

Policy 9.2.4. Continue to implement programs to upgrade the wastewater collection system to mitigate existing deficiencies and *accommodate the needs of growth and development.* (Emph. added)	The Proposed Project would not upgrade the existing wastewater collection system; however, it would include upgrades to the existing wastewater treatment facility to create purified recycled water for groundwater replenishment from the recycled water generated at DCTWRP. *Maintaining the reliability of potable water supply would serve to accommodate the needs of growth and development throughout the City.* The Proposed Project would be generally consistent with this policy. (Emph. added)

Clearly, the wording of this table item cannot be construed as anything but adding to the water supply for the purposes of allowing further development. As such, it undermines the desire of SFVAS to support the Project.

BIOLOGICAL RESOURCES INADEQUATELY DESCRIBED

In general, the section on biological resources is focused on activities that take place during construction -- not impacts that occur as a result of the implementation of the Project (see above). The impacts on biological resources in and around the San Fernando Valley will likely be severe, if the Project induces growth, as we suspect it will. Some attention to these impacts caused by various levels of development should be given in the EIR.

8-5

Concerning the description of biological resources provided in the DEIR, we are witnessing an epidemic of repeated failures by consultants to adequately address those resources in environmental documents of all kinds. This DEIR is no exception. (See comments under Descriptions of Biological Resources, below). Not only does the DEIR fail to adequately describe the resources present, but it fails to provide an adequate context for that description in terms of the overall scarcity and continuing shrinkage and abuse of habitat islands within the San Fernando Valley. Understanding impacts on wildlife cannot occur in

8-6

absence of such a context.

Descriptions of Biological Resources

The descriptions of biological resources in Appendix D of the DEIR are based on single field surveys, conducted on August 23, 2015 and November 25, 2013 by biologists, and on reviews of information obtained from databases maintained by the California Department of Fish and Wildlife, U. S. Fish and Wildlife Service, and California Native Plant Society. Additional information was acquired from aerial photography. It is acknowledged that no seasonal surveys were conducted. Nowhere in the report is any reference made to the massive amounts of data on available on the avifauna of Sepulveda Basin from comprehensive brochures, e-bird files, and other readily available information. Consequently, the descriptions of biological resources and of the avifauna in particular, are, as is to be expected, seriously deficient. This deficiency, while it might not change the conclusions of the report regarding impacts, must be corrected as a matter of record.

The DEIR contains the remarkable statement that "[n]o federally or state-listed wildlife species were detected during field surveys of onsite components." This is erroneous. The area is known to support a breeding population of federally endangered Least Bell's Vireos, migratory Willow Flycatchers (probably including the endangered southwestern form), and migratory threatened Swainson's Hawks. A number of other special status species are also found in the area. This includes the hoary bat (dead specimen salvaged) and southern western pond turtle (often referred to as the southwestern pond turtle). The DEIR Appendix must be modified to reflect these realities. 8-6 Cont'd.

Regarding raptors, Red-tailed Hawks are known to nest and forage in the vicinity of the DCTWRP, as are Cooper's Hawk and American Kestrel. The latter was not discussed in the document. In addition, White-tailed Kites are frequently found in the area in some years, along with Osprey, which is found year-round. The nesting status of these two species is uncertain. Northern Harrier and Sharp-shinned Hawk are sometimes observed, and, unusual for the area, a Broad-winged Hawk wintered in the area a few years ago. The Great-Horned Owl is a known nester in the vicinity of DCTWRP. Information about these species in the Sepulveda Basin area surrounding the plant is readily available, and the DEIR is seriously deficient in not having pursued such information more thoroughly.

CONCLUSION

Based on the foregoing, we find that the DEIR requires serious, albeit not lengthy, modification. SFVAS can conditionally support the Project, provided that actions are taken to assure that the availability of water does not stimulate developments in our remaining open spaces and that water is provided by DWP to wetlands that require supplemental water to retain viability. It is likely that SFVAS cannot support the Project in the absence of such assurances. 8-7

The attention given in this letter to limited concerns must not be construed as indicating that these are the only concerns SFVAS has concerning this project, and we may submit additional comments as they may be warranted.

We appreciate the opportunity to provide comments on this important project.

Sincerely,

Original signed

Mark B. Osokow,
San Fernando Valley Audubon Society,
Member of the Board of Directors,
Chair, San Fernando Valley Bird Observatory,
Representative to the Recycled Water Advisory Group

and,

Original signed

David A. Weeshoff,
San Fernando Valley Audubon Society,
Past President,
Chair, Conservation Committee

Comment Letter 8: San Fernando Valley Audubon Society

Response 8-1

The commenter provides general introductory remarks about the San Fernando Valley Audubon Society (SFVAS), its mission, and the purpose of the comment letter. Issues mentioned in a summary fashion in this comment are addressed in detail in subsequent comments below, and, therefore, no further response to this comment is provided.

Response 8-2

The commenter provides background for SFVAS's position related to water policy, management, and use in the City of Los Angeles; the land development that has been sustained by such policy, management, and use; and the impacts created by past and ongoing development on wildlife habitat throughout the City and surrounding areas, including areas remote from Southern California that support water importation to the City, such as the Owens Valley, Sacramento-San Joaquin Delta, and the Colorado River watershed.

The commenter indicates that SFVAS generally supports the City's water supply goals related to conservation, storm water capture, and wastewater recycling as a means to meet the needs of existing customers while reducing reliance on imported water and the attendant impacts on wildlife and habitat. Nonetheless, the commenter asserts that any new water supply, regardless of the source, would inherently induce growth that would further impact open space habitat in the City absent the institution of corresponding "laws, regulations, ordinances, or other mechanisms" to prevent such impacts.

In this regard, the commenter maintains that the Draft Environmental Impact Report (EIR) failed to indicate with a "certainty" that the Proposed Project would stimulate, or at least allow for the continuation of, further development in the City. Based on this supposition, the commenter asserts that the Draft EIR is deficient in that it did not then consider the potential impacts that would arise from such continued development. This is a general assertion that is addressed with more specificity in subsequent comments below related to growth inducement. As such, a detailed response to the issue of Project-induced growth and the potential impacts on wildlife habitat caused by this growth is provided below in Response 8-4.

Response 8-3

The commenter expresses the opinion that the Los Angeles Department of Water and Power (LADWP) has not always met previous commitments related to water use for habitat conservation. As an example, the commenter discusses issues related to the "Ecology Pond" at the Chatsworth Nature Preserve (CNP), which had in the past been maintained with water from the City's potable supplies but which in 2015 stopped receiving potable water due to the drought emergency. Even with the provision of some recycled water supplies, hauled to the site by truck, the open water surface at the pond has been reduced, limiting habitat for aquatic avian species and potentially affecting adjacent upland nesting habitat. However, expert opinion regarding the Ecology Pond (which supports numerous invasive species) and its value as a natural ecosystem varies widely. Nonetheless, the issues involving the CNP are unrelated to the Proposed Project, and the commenter indicates no issues regarding the adequacy of the Draft EIR in relation to the situation at the CNP. Therefore, no further response to this comment is provided.

Response 8-4

The commenter mentions a number of large developments, either currently under construction or planned, throughout the San Fernando Valley that will require potable water. The commenter is skeptical of LADWP's commitment to water conservation reflected in the Proposed Project's production and use of purified recycled water for groundwater replenishment, which, based on the commenter's concerns, may only serve to stimulate further development. The commenter believes there are fundamental contradictions in the basic premise of the Project, as quoted by the commenter from Section 4.4, Growth Inducing Impacts, page 4-11 of the Draft EIR:

> The fundamental purpose of the Proposed Project is to reduce the City's dependence on imported water sources by increasing the local groundwater supply available for potable use. With Project implementation, imported water supplies would be offset by up to 30,000 AFY [acre feet per year] of purified water through groundwater replenishment, thereby supplementing the City of Los Angeles' local potable water supply and increasing system reliability and sustainability.

This paragraph continues in the Draft EIR as follows:

> The Proposed Project is consistent with the Los Angeles Mayor's 2014 Executive Directive No. 5 (Emergency Drought Response), 2015 Sustainable City Plan, and 2012 Recycled Water Master Plan (RWMP). Because the Project is intended to replace existing imported supplies, it would not increase overall water supplies to the City in a manner that would induce population growth.

The commenter interprets the supplementation of local water supplies with purified water via groundwater replenishment, as cited in the above text, as an indication of an increase in the overall water supply of the City such that growth would be induced by implementation of the Project. As stated by the commenter, "any conclusion derived from [the above] words is worthless, as there is no stated commitment to maintain (or reduce) water supply levels after the completion of the Project at the same (or reduced) levels prior to the initiation of the Project…If the intent of the project is to reduce, offset, or replace imported water that should be unambiguously and consistently stated."

The text from the Draft EIR cited by the commenter provides an unambiguous statement regarding the intent of the Project to replace existing imported supplies of water with local supplies provided through groundwater replenishment with purified recycled water. While it is true that local supplies would be supplemented (that is, increased) by up to 30,000 AFY, the City's overall water supply would not increase since the Project would offset (that is, decrease) imported supplies by the same amount. Similar statements regarding the primary objective and fundamental purpose of the Project (i.e., to offset existing imported water supplies with increased local supplies derived from groundwater replenishment) are consistently included throughout the Draft EIR. The Project does not provide, as stated by the commenter, "a coincident program of rules, regulations, or ordinances that would limit growth that impinges on remaining open spaces," since that is beyond the scope of a project intended to provide alternative sources of water to the City that would be more reliable and sustainable than the imported supplies that it would replace and that currently make up the majority of the City's water portfolio.

While the Project does not include "rules, regulations, or ordinances" explicitly limiting growth that might affect open space areas, as discussed in the Draft EIR (on pages 1-1 through 1-2 and 2-2 through 2-3), the Project is being proposed to implement elements of the City's 2010 Urban Water Management Plan (UWMP; recently updated in 2015 and adopted in 2016, after publication of the Draft EIR). Pursuant to the California Urban Water Management Planning Act as codified in California Water Code Division 6, Part 2.6 (Section 10610 et seq.), the UWMP is required of California water suppliers (such as LADWP) to actively pursue the efficient use of available supplies. The LADWP UWMP facilitates the City's goal to provide reliable and sustainable water supplies to customers over the 25-year timeframe of the plan, which is updated in 5-year increments to account for changing circumstances. The current UWMP was developed as a direct response to persistent drought conditions and the need to reduce dependence on increasingly less reliable, costly, and less environmentally sustainable imported supplies of water. The Draft EIR states the following (starting on page 1-1) in relation the commitment to reduce imported supplies:

> In response to these challenges related to traditional imported water supplies, the City has embarked upon an aggressive effort to maintain reliable and sustainable sources of water. Long-term strategies outlined in the 2010 Los Angeles Urban Water Management Plan (UWMP) intended to "meet the City's water needs while maximizing local resources and minimizing the need to import water" include increasing water conservation, increasing water recycling, enhancing stormwater capture, and accelerating groundwater cleanup. These strategies are not alternative means to achieve local water supply goals but are complementary and mutually inclusive.
>
> Consistent with the Los Angeles Mayor's 2014 Executive Directive No. 5 (Emergency Drought Response) and 2015 Sustainable City Plan, these strategies will help achieve the goals of reducing per capita water use by 25 percent by 2035, decreasing the purchase of [Metropolitan Water District] imported water supplies by 50 percent by 2025, and sourcing 50 percent of the City's water from local supplies by 2035.
>
> In relation to recycled water, the UWMP established a goal to increase the use of recycled water within the City to 59,000 acre-feet per year (AFY) by 2035. As an implementing plan to achieve this goal, the 2012 Recycled Water Master Plan (RWMP), prepared jointly by LADWP and LASAN [the Los Angeles Department of Public Works Bureau of Sanitation], determined based on the available capacity of recycled water treatment that 30,000 AFY should be dedicated to groundwater replenishment (GWR) to help enhance the City's ability to use groundwater from the San Fernando Groundwater Basin (SFB) aquifer. The 2012 Groundwater Replenishment Master Plan (GWRMP) further evaluated the facility requirements and siting factors related to achieving the GWR goal identified in the RWMP.
>
> The Proposed Project presented in this Draft EIR is an outcome of this planning process and reflects policies to reduce reliance on imported water, increase the use of recycled water, and replenish the groundwater basin in order to maintain a sustainable, safe, and reliable supply of potable water to meet the needs of the City of Los Angeles.

The commenter points to Table 3.10-1 of the Drat EIR (Project Consistency with Applicable General Plan Policies) as assumed evidence that the Project would provide additional water supply "for the purposes of allowing further development." However, it is important to note that in the preparation of UWMPs, the California Urban Water Management Act requires that suppliers account for both current and projected population growth based on population projections from state, regional, or local service agencies (Sections 10631 and 10635 of the California Water Code). As mentioned on page 1-1 of the Draft EIR, "In accordance with the Administrative Code of the City of Los Angeles, LADWP is authorized and obligated to supply potable water to meet the needs of the City's residents, businesses, and other functions." In order to responsibly fulfill this obligation pursuant to the Urban Water Management Act, the needs of both the current population and the projected population must be considered.

The development of the water demand projections and supply reliability for the UWMP (and, by extension, the determination of the need for and purpose of the Proposed Project) were predicated on the projected population in the LADWP service area over the 25-year timeframe of the plan (as determined by data from the Southern California Association of Governments 2012 Regional Transportation Plan). During this timeframe, population in the service area is anticipated to increase about 11 percent, from about 3.99 million to about 4.44 million. Total water demand is expected to increase about 14 percent from less than 600,000 AFY to about 675,700 AFY under average weather conditions. Under dry year conditions, demand would increase to about 709,500 AFY. Therefore, the UWMP and, by extension, the Proposed Project are responsive to the projected natural growth in population anticipated over the next 25 years, but they would not induce this growth.

Similarly, the portion of Table 3.10-1 excerpted in the comment letter is reflective of the consistency of the Project with the City of Los Angeles General Plan policy related to wastewater infrastructure upgrades necessary to accommodate projected population growth, rather than induce unplanned growth. In this instance, consistency with the approved General Plan, which provides for orderly future development in response to anticipated population growth in the City (including the provision of adequate public services, such as wastewater processing and water supply), is the relevant determinant of a less than significant impact related to growth inducement.

Taking into account that the UWMP must respond to anticipated population increases as reflected in regional demographic forecasts, the plan nonetheless demonstrates the capability of LADWP to meet the total demand for water while reducing purchases of imported supplies by 2025 to an average of about 25 percent from a current baseline of about 55 percent. The plan also demonstrates the capability of LADWP to meet the total demand while increasing local supply sources by 2035 to over 50 percent of the total from a baseline of about 35 percent. This will be accomplished partially by aggressive conservation measures (including codes and ordinances related to water use) that will lower actual demand by 2040 to 565,500 AFY from a total demand without such measures of 675,700 AFY in average weather years and 709,500 AFY in dry years. In addition, the reduction in imported water and increase in local water supply will be achieved by expanding recycled water programs (including groundwater replenishment) and stormwater capture and implementing projects to remediate groundwater basins. Contrary to the assertion in the comment letter, the Proposed Project, as discussed throughout the Draft EIR, is a vital component of these programs, fully intended to reduce the City's dependence on imported water sources by increasing the local groundwater supply available for potable use, as opposed to increasing the overall supply of water while maintaining current levels of imported supplies.

Response 8-5

The commenter expresses the opinion that the impacts to biological resources from Project operation will likely be severe if the Proposed Project induces growth. As discussed above in Response 8-4, the Project is necessary to implement an important aspect of the UWMP relative to increasing local water supplies in order to decrease dependence on increasingly less reliable, costly, and less environmentally sustainable imported water supplies. In the context of the regional demographic forecasts upon which the UWMP is based, the Project, as stated in the Draft EIR (Section 4.4), "would not increase overall water supplies to the City in a manner that would induce population growth." See Response 8-4 for more discussion regarding growth inducement.

Response 8-6

As noted by the commenter, the existing biological conditions for the onsite and offsite components were determined based on a review of the California Department of Fish and Wildlife (CDFW), United States Fish and Wildlife Service (USFWS), and California Native Plant Society (CNPS) sensitive species occurrence databases; field surveys conducted on November 25, 2013, and August 23, 2015; and a review of aerial photography. The sensitive species databases are comprehensive and were reviewed for the Van Nuys quadrangle, within which both the onsite and offsite Project components occur, and the surrounding eight quadrangles (San Fernando, Beverly Hills, Burbank, Canoga Park, Goat Mountain, Hollywood, Sunland, and Topanga) to ensure that a full review of data for the Project site and surrounding area was conducted. As discussed in Section 3.4, Biological Resources, of the Draft EIR, based on the database review, 41 special-status wildlife species have been previously recorded in the Project area and one additional species (Cooper's hawk) was included because it is known to occur in urban southern California environments. The potential for the 42 evaluated special-status wildlife species to occur within the biological study area (BSA) is presented in Table B within Appendix D of the Draft EIR. The BSA encompasses the footprint of the Proposed Project (DCTWRP, the recycled water pipeline along Arleta Avenue, Hansen Spreading Grounds, and Pacoima Spreading Grounds) plus a 300-foot buffer. As discussed in Section 3.4 of the Draft EIR, the BSA, may provide suitable habitat for only 3 of the 42 special-status species evaluated due to the fact that the areas in which the Proposed Project components occur are located in urban areas that have been previously developed and/or disturbed.

The statement in the Draft EIR that no federally or state-listed wildlife species were detected during field surveys on onsite components is based on direct observations recorded during field surveys. As discussed in Appendix D of the Draft EIR, based on the survey conducted and an assessment of habitats within the BSA, most special-status plant and wildlife species are not expected to occur. Nonetheless, to reduce impacts to those special-status wildlife species that may occur within BSA, Mitigation Measures BIO-A and BIO-B would be implemented. Mitigation Measure BIO-A includes measures that would limit construction activities and equipment to within clearly delineated work areas. Mitigation Measure BIO-B would protect all special-status and migratory bird species that may occur within the BSA. Mitigation Measure BIO-B requires pre-construction surveys to determine the presence of active nests and, if active nests are found, avoidance of the nest and monitoring by a qualified biologist shall occur. Mitigation Measures BIO-A and BIO-B would serve to protect all special-status wildlife species, whether they are those 3 species that have been identified in the Draft EIR as having the potential to occur within the BSA or some other species that is not expected to occur but may have been previously recorded as occurring within the BSA.

Response 8-7

The commenter conditions the SFVAS's support of the Proposed Project on assurances that the water made available by the Proposed Project would not stimulate development and that LADWP agrees to provide supplemental water necessary to sustain wetlands, presumably in the San Fernando Valley. Relative to the stimulation of development, as discussed in Response 8-4 above, the Proposed Project, as a component of the UWMP, would help accommodate the projected natural growth in population anticipated in the LADWP service area over the next 25 years. The Proposed Project would not induce this growth and, therefore, would not stimulate development. As discussed in Response 8-3, above, in specific reference to the CNP, the issue of the provision of supplemental water to wetlands is beyond the scope of the Proposed Project, and the comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in Draft EIR. Therefore, no further response to this comment is provided.

SPEAKER/COMMENT CARD

LOS ANGELES GROUNDWATER REPLENISHMENT PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT
PUBLIC MEETING
June 14, 2016
Sepulveda Garden Center

Nadia Parker
Los Angeles Department of Water and Power
111 North Hope Street, Room 1050
Los Angeles, CA 90012
E-Mail: Nadia.Parker@ladwp.com

Please check the appropriate box below:

☒ **I wish to speak at the Public Meeting**

☐ **I have provided my comments on this sheet**

Name: Dr Tom Williams

Organization: Citiz. Coalit. for A Safe Community

Address: 4117 Barrett Rd LA CA 90032-1712

E-mail: ctorlliams2012@yahoo.com

COMMENTS *(Please print legibly)*:

Pg the review period has included 2 nat'l. holidays – Extend Deadline by 2 weeks 9-1

Major concerns for "brine/sludge/solids and entire pipeline system - current and projected capacities and changes of service areas. Pipeline 9-2

Please use the back of this page if needed.

Comment Letter 9: Williams, Dr. Tom 1

Response 9-1

The commenter requests that the review period for the Draft Environmental Impact Report (EIR) be extended by 2 weeks. Pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15105, CEQA requires that the public review period for a Draft EIR be no less than 30 days and no longer than 60 days except under unusual circumstances. When a project is submitted to the State Clearinghouse for review by state agencies, the public review period should be no less than 45 days unless a shorter period, not less than 30 days, is approved by the State Clearinghouse. As the Draft EIR was sent to the State Clearinghouse for review, a 45-day review period was required. The Draft EIR was available for public review from May 12, 2016 through July 11, 2016, a period of 60 days. This extended the required 45-day review period by 15 days in order to allow for additional review time due to the occurrence of two national holidays coinciding with the review timeframe for the Draft EIR. Thus, the public review period for the Draft EIR was consistent with the public review requirements under CEQA.

Response 9-2

The commenter expresses concern over the capacity of existing pipeline systems in relation to brine, sludge, and solids created by the Proposed Project. As discussed in Chapter 2, Description of the Proposed Project, on page 2-3 of the Draft EIR:

> The existing DCTWRP [Donald C. Tillman Water Reclamation Plant], located in the San Fernando Valley, has the capacity to treat up to 80 mgd [million gallons per day] of wastewater if both the existing 40-mgd phases are operational. Only a single phase (i.e., 40 mgd) is currently operated at a given time due to insufficient demand and/or infrastructure for recycled water delivery. The wastewater that would otherwise be treated in the second phase at DCTWRP instead currently bypasses the plant and is conveyed to Hyperion Treatment Plant in Playa Del Rey, where it undergoes a secondary level of treatment and is discharged into Santa Monica Bay.

As further discussed on page 2-34 of the Draft EIR:

> [Microfiltration] backwash would be diverted from the AWPF [Advanced Water Purification Facilities] into the DCTWRP in-plant sewer for treatment at DCTWRP or Hyperion Treatment Plant. A new 3,000-foot-long, 24-inch-diameter pipeline would be constructed to transfer the brine from the proposed AWPF to the existing VORS [Valley Outfall Relief Sewer] located in Victory Boulevard. Once discharged to the VORS, the brine would combine with other DCTWRP biosolids and flow to the Hyperion Treatment Plant via the La Cienega San Fernando Valley Relief Sewer for further processing.

While the byproducts of the Propose Project (e.g., solids from primary treatment related to the simultaneous operation of both existing phases of DCTWRP and the backwash and brine solutions resulting from the water purification process) would be routed to the existing wastewater sewer system and flow to Hyperion Treatment Plant, the volume of these byproducts would be less than the wastewater that currently bypasses DCTWRP without treatment and is routed to Hyperion. Therefore, the capacity of the existing pipeline system to accommodate these flows is adequate.

6

Comment Letter No. 10

SPEAKER/COMMENT CARD

LOS ANGELES GROUNDWATER REPLENISHMENT PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT
PUBLIC MEETING
June 14, 2016
Sepulveda Garden Center

Nadia Parker
Los Angeles Department of Water and Power
111 North Hope Street, Room 1050
Los Angeles, CA 90012
E-Mail: Nadia.Parker@ladwp.com

Please check the appropriate box below:

- [x] **I wish to speak at the Public Meeting**
- [ ] **I have provided my comments on this sheet**

Name: Olga Ayala

Organization: Resident

Address: 13701 SAYRE ST Sylmar CA

E-mail: Ayala3978@yahoo.Com

COMMENTS ***(Please print legibly)***:

Traffic mitigation at Arleta -
One year to Two years of obstruction
on Artet puts an extrem Burden to
resident taking kids to school. 10-1

Please use the back of this page if needed.

Comment Letter 10: Ayala, Olga

Response 10-1

The commenter states a concern regarding traffic along Arleta Avenue during construction of the Proposed Project. The Proposed Project would develop and implement a Traffic Management Plan (TMP) in coordination with the City of Los Angeles Department of Transportation (LADOT), as outlined in Mitigation Measure TRA-A on pages 3.15-19 and 3.15-20 of the Draft Environmental Impact Report (EIR). As discussed in Mitigation Measure TRA-A, the TMP would include the provision of "continued access via detours for vehicles and to provide for adequate pedestrian and transit circulation." The Draft EIR concludes that implementation of Mitigation Measure TRA-A would reduce construction-related traffic impacts on Arleta; however, given the magnitude of the worsening of the level of service during construction of the recycled water pipeline, the impacts to traffic on Arleta Avenue would remain significant and unavoidable.

As shown in Figure 2-12, Project Construction Phases and Schedule, on page 2-26 of the Draft EIR, construction of the recycled water pipeline would take approximately 18 months to complete. However, while the recycled water pipeline would extend approximately 11,000 feet along Arleta, construction would use an open trench technique that occurs sequentially along Arleta Avenue in smaller segments. As such, the active construction zone would continue to shift linearly along the proposed recycled water pipeline alignment, thus minimizing the duration of disruption within any one area of the street. As described on page 2-29 of the Draft EIR, once three to four sections of pipe are installed, that portion of trench would be backfilled and returned to its existing condition while trenching activities begin for the next segment of pipeline. Due to the linear nature of the construction activities associated with the proposed recycled water pipeline, construction would not occur continuously along the entire Arleta Avenue alignment, and the portions of this roadway where construction activities are not ongoing would remain open throughout the construction period for this Project component. Additionally, portions of the active construction zone may be covered with metal plates during periods of the day when construction is not ongoing to allow for continued passage of traffic.

SPEAKER/COMMENT CARD

LOS ANGELES GROUNDWATER REPLENISHMENT PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT
PUBLIC MEETING
June 14, 2016
Sepulveda Garden Center

Nadia Parker
Los Angeles Department of Water and Power
111 North Hope Street, Room 1050
Los Angeles, CA 90012
E-Mail: Nadia.Parker@ladwp.com

Please check the appropriate box below:

☐ **I wish to speak at the Public Meeting**

☒ **I have provided my comments on this sheet**

Name: Robert A Rougé

Organization: Arleta Crime Watch Team

Address: 9650 Arleta Ave. Arleta, CA 91331

E-mail: robertarouge@yahoo.com

COMMENTS *(Please print legibly)*:

Specific lecture on Recycled water from sewage treatment plants, needs to educate Subscribers on the process and the success of other cities EG: orange county, that have been utilizing AWPF systems,

11-1

Please use the back of this page if needed.

Comment Letter 11: Rougé, Robert A.

Response 11-1

The commenter suggests that lectures be held to educate the public on the processes involved in recycled water treatment and the success in other cities. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft Environmental Impact Report (EIR). Therefore, no further response to this comment is provided. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

In addition, it should be noted that the Los Angeles Department of Water and Power (LADWP) and the Los Angeles Department of Public Works Bureau of Sanitation (LASAN) have conducted an extensive public outreach program to promote the advantages and safety of recycled water use. In addition to providing literature and promotional material, LADWP and LASAN have been involved with nearly 300 separate outreach events over the last three fiscal years, ending in June 2016. These have included presentations, public meetings, facility tours, demonstrations, open houses, and conferences involving such groups as elementary, middle, and high schools; universities; City and Neighborhood Council representatives; residential associations; community, service, business, and professional organizations; and environmental advocacy organizations.

Comment Letter No. 12

SPEAKER/COMMENT CARD

LOS ANGELES GROUNDWATER REPLENISHMENT PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT
PUBLIC MEETING
June 14, 2016
Sepulveda Garden Center Encino

Nadia Parker
Los Angeles Department of Water and Power
111 North Hope Street, Room 1050
Los Angeles, CA 90012
E-Mail: Nadia.Parker@ladwp.com

Please check the appropriate box below:

☒ **I wish to speak at the Public Meeting**

☒ **I have provided my comments on this sheet**

Name: Dr Tom Williams

Organization: Citizens Coalit. Safe Community

Address: 4117 Bassett Rd LA 90032

E-mail: ctwilliams202@yahoo.com

COMMENTS *(Please print legibly)*:

061416 / Encino

#1 The Boss(es) - whose is in charge of the Program - Program Manager - is(are) not identified. 12-1

#2 The Program Purposes/Needs-Goals/Objectives - similarly also for projects - are not identified. specifics 12-2

#3 Inclusion of two national holidays in the review period reduces level of efforts available. Please extend the review period by two weeks/14days - July 11 > July 25. 12-3

#4 As many elements are included and other related activities are closely related, a Programmatic EIR is more appropriate...Please withdraw the current DEIR, revise/update, and re-circulate. 12-4

#5 Provide ALL computer models - surface/soil-vadose/subsurface structure, inputs, and outputs, including shape files.

#6 Provide visual process flow charts for all projects and their connections to existing and future facilities (using typical elementary/intermediate school "water cycle" as an example). 12-5

#7 Provide understandable clear tables as to comparing current capacities and uses, proposed changes, and planned capacities and use.

#8 Provide plans and sections for all contaminated groundwater resources, their likely sources, and their changes with the propoed program/projects.

#9 Provide locations/source, compositions, estimates, and dispositions of all residuals from the project (stormwater settleables/sludges and debris, brines, and process sludge. 12-6

#10 Provide all data and/or data sources for development of slide #8 "Infiltration Variations" and slide #27 "TCE Plume".

#11 Provide all models, inputs/outputs for TCE and other contaminant plumes in the Projects/Program areas. 12-7

Comment Letter 12: Williams, Dr. Tom 2

Response 12-1

The commenter states that the person(s) "in charge of the Program" are not identified. In relationship to the Proposed Project, the commenter is referred to Chapter 1, Introduction, pages 1-2 and 1-3 of the Draft Environmental Impact Report (EIR), which includes an explanation of the roles of the various public agencies involved in the approval and/or implementation of the Proposed Project (also see page 1-3 of this Final EIR):

> Several public agencies would have a key role in the approval and/or implementation of the Proposed Project. As the public agencies responsible for water resources in the City of Los Angeles, LADWP [Los Angeles Department of Water and Power] and LASAN [Los Angeles Department of Public Works Bureau of Sanitation] are working jointly to plan, design, implement, and operate the Project. LADWP, as the supplier of potable water to the City of Los Angeles, would maintain final use and control of the purified water produced at DCTWRP [Donald C. Tillman Water Reclamation Plant] under the Project and would provide funding to support Project implementation and operations. As such, LADWP is serving as the Lead Agency under CEQA [California Environmental Quality Act] for the Project. The City of Los Angeles Board of Water and Power Commissioners, in order to approve the Proposed Project or alternative to the Project, must certify that the Project EIR was prepared in accordance with CEQA and other applicable codes and guidelines, and it must take into account the conclusions contained in the EIR when considering approval of the Project. LASAN, which is the operator of DCTWRP, also plays an integral role in the Proposed Project, since it would own and operate the AWPF [Advanced Water Purification Facilities] and related facilities to produce purified water. Therefore, LASAN, as part of the City of Los Angeles Department of Public Works, is a responsible agency under CEQA for the Project. The City of Los Angeles Board of Public Works must also take into account the conclusions contained in the EIR when considering various permits and approval of a Memorandum of Agreement between LADWP and LASAN for the design, construction, operation, maintenance, and reimbursements for the AWPF and related facilities at DCTWRP. The Los Angeles County Department of Public Works is also a CEQA responsible agency because it owns and operates Hansen Spreading Grounds (HSG) and Pacoima Spreading Grounds (PSG) and therefore must approve construction at the spreading grounds and the use of the spreading grounds by LADWP for groundwater replenishment. The Los Angeles County Department of Public Works would continue to own and operate HSG and PSG with implementation of the proposed project. It must also take into account the EIR when considering approval of a Memorandum of Understanding for operations and maintenance related to spreading of purified water at HSG and PSG.

In addition, the commenter is referred to Chapter 7, List of Preparers, page 7-1, which includes a listing of the staff members from the various public agencies involved in the Project and the preparation of the Draft EIR.

Response 12-2

The commenter states that the "Program" purpose, need, goals, and objectives are not identified in the Draft EIR. This comment arose in association with a public meeting held by LADWP and Los Angeles County Department of Public Works on June 13, 2016, during which several projects located in the Arleta community of the City were presented. Although the Proposed Project was discussed at this meeting, the projects presented are independent projects that are not considered part of a "Program" from a CEQA point of view. For additional information regarding Program-level versus Project-level analyses, the commenter is referred to Response 12-4 below.

Relative to the Proposed Project, the commenter is referred to Chapter 2, Description of the Proposed Project, Section 2.4, Project Purpose, Need, and Objectives, on pages 2-15 through 2-16 of the Draft EIR, which includes a discussion of the Project purpose and need, and outlines the objectives of the Project. As discussed on page 2-15, the "primary objective and fundamental purpose of the Proposed Project is to supplement the City of Los Angeles' local potable water supply through GWR [groundwater replenishment] with up to 30,000 AFY [acre feet per year] of purified water in order to reduce dependence on imported water and diversify the City's water portfolio, thereby increasing system reliability and sustainability."

The specific objectives of the Proposed Project are listed on page 2-16 of the Draft EIR and include the following:

- Providing up to 30,000 AFY of purified water for GWR in the SFB.
- Utilizing the available underused treatment capacity of DCTWRP to provide recycled water for the advanced water purification process.
- Utilizing the available spreading capacity of HSG and PSG to replenish the SFB [San Fernando Groundwater Basin] through the percolation of purified water.
- Utilizing existing infrastructure, to the extent feasible, to convey recycled water from DCTWRP to HSG and PSG.
- Maintaining the existing levels of recycled water supplies for NPR [non-potable reuse] customers and other beneficial uses.
- Maintaining the functional and logistical integrity of LASAN operations.
- Preserving future potential expansion capability for recycled water treatment and advanced water purification processes.

Response 12-3

The commenter requests that the Draft EIR public review period be extended by two weeks as two national holidays fell within the review period. The commenter is referred to Response 9-1 regarding the public review period for the Draft EIR.

Response 12-4

The commenter maintains that a Program-level EIR is the more appropriate CEQA document to address the impacts of the Project and, therefore, the current Project-level Draft EIR should be

revised and recirculated accordingly. Since this comment arose in association with a public meeting held by LADWP and Los Angeles County Department of Public Works in the Arleta community of the City on June 13, 2016, during which several projects located within the Arleta community were presented, it is assumed the commenter is referring to the preparation of a Program EIR to address all these projects in a single document. This seems to be founded on the notion that the presented projects all involve the capture, transmission, storage, and/or treatment of water by local public agencies and that the projects are located in the same general geographic area (i.e., within or surrounding the Arleta community). However, similarities in the type of projects, sponsorship by the same agency, and/or geographic proximity do not alone establish the basis for a Program EIR. If this were not the case, it could be argued that all LADWP projects within a given geographic area would be subject to a Program EIR regardless of such issues as the purpose of the projects, schedule for the projects, and the availability of enough detailed information about each project to allow for adequate analysis of potential environmental impacts.

Many (although not all) of the projects presented at the June 13 Arleta community meeting were discussed as potential components of the 2016 LADWP Urban Water Management Plan (UWMP). Per Section 15282(v) of the CEQA Guidelines, "The preparation and adoption of Urban Water Management Plans pursuant to the provisions of Section 10652 of the Water Code" are statutorily exempt from CEQA (i.e., from the preparation of an EIR or Negative Declaration). Nonetheless, on a case-by-case basis, individual projects outlined in a UWMP may still be subject to CEQA. The Arleta community area projects include infrastructure repair, groundwater remediation, stormwater capture, as well as the proposed groundwater replenishment project. However, each of these projects possesses independent utility; that is, each has a different purpose, and each could proceed whether or not the other projects were implemented. The independent utility of a project (that it can be implemented with or without the implementation of another project, regardless of similarities) has been found by the courts to be a key consideration in determining that piecemealing (the segmentation of a single project into smaller, presumably less environmentally impactful, pieces) has not occurred and in establishing the appropriate and necessary type of EIR that may be prepared. (See *Del Mar Terrace Conservancy, Inc. v. City Council* (1992) 10 Cal. App. 4th 712, 731-737.)

In addition, case law suggests that the label attached to the EIR is not as important as the content of the EIR. For example, in 2014, the use of a Project EIR, rather than a Program EIR, was upheld for the Treasure Island/Yerba Buena Island Project, which is a mixed-use project that would be implemented in smaller components over a 15 to 20-year period. Given this implementation timeframe, the plaintiffs in this case contended that a Program EIR seemed most appropriate. However, the court found that it did not matter what the EIR was called as much as what it included. The court stated that the determination an EIR's sufficiency does not depend on the "semantic label accorded to the EIR," (i.e., whether it is a Project-level or Program-level EIR) but whether it includes adequate analysis such that decision makers can appropriately consider the potential environmental impacts of the project. (See *Citizens for a Sustainable Treasure Island v. City & Cty. of San Francisco* (2014) 227 Cal. App. 4th 1036, 1048.)

In this regard, the current Draft EIR not only analyzed the impacts of the Proposed Project itself but also included an analysis of the potential cumulative impacts of the Project when considered alongside of other projects in the vicinity, including the aforementioned water projects presented at the June 13 Arleta community meeting. Nonetheless, because the projects presented at the June 13 Arleta community meeting possess independent utility from the Proposed Project, occur in different timeframes than the Project, and are at various levels of plan development, a

Project EIR is the appropriate CEQA document to address the potential environmental impacts of the Project.

Response 12-5

The commenter requests computer modeling data, process flow charts, and facility capacity tables, and groundwater contamination related to the various projects presented at the Arleta community public meeting held by LADWP and Los Angeles County Department of Public Works on June 13, 2016. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. Therefore, no further response to this comment is provided. However, the comment is noted and will be forwarded to the decision-making bodies for their review and consideration.

Response 12-6

The commenter requests information on the handling of the residual byproducts resulting from the Proposed Project water purification process. The commenter is referred to Response 9-2 above regarding production, transmission, and treatment of these byproducts. However, this comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. Therefore, no further response to this comment is provided.

Response 12-7

The commenter requests data and modeling regarding another project that was presented at the June 13 Arleta community meeting. The comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. Therefore, no further response to this comment is provided. However, the comment is noted and will be forwarded to the decision-making bodies for their review and consideration.

From: Liz Amsden <LizAmsden@hotmail.com>
Sent: Tuesday, June 21, 2016 4:38 PM
To: Parker, Nadia
Subject: Comments on draft EIR on LA groundwater replenishing project

First – most individuals commenting don't need volume – they need content. Perhaps the summary can be expanded addressing salient point with references people can choose to look at if they are of interest. There should also be PAGE NUMBERS for the entire document, not by chapter so people can more readily source material. 13-1

The Mayor of Los Angeles is calling for greater resilience. If 90% of the City's potable water is imported, the DWP has a HUGE job ahead of them to reverse those figures so the City does not descend into water wars when a major earthquake or other disaster (natural or manmade) cuts off the aqueducts.

The plan addressed by this EIR just does not go far enough.

Focus needs to be on the following:

* moving IMMEDIATELY to the 'toilet to table' model which is in use in Israel and on the space station – those who object are probably those already buying bottled water – why should my tax dollars (and developers' budgets), money better spent elsewhere, be used for dual-plumbing and other half-way solutions?

* LA Sanitation says that half the City's needs can be obtained from existing rainfall – I am glad to see you are working with them but you need to make it faster/better

* concerned about poisons in the run-off? ban Monsanto and stop those poisons affecting the rivers and oceans 13-2

* explore desalinization plants – if Israel can make them cost effective so can California

* make recycling more effective and keep it simple: make it a mandate by requiring it be done prior to the sale of any property – residential, rental or business, share the costs so people will act sooner rather than later

* ALL new development (except, possibly, in the initial stages conversions of existing buildings to in-perpetuity affordable housing) MUST subsidize infrastructure upgrades (and I mean UPGRADES, not patches on our failing systems)

* use tertiary water IMMEDIATELY for urban farming, fighting wildfires, LA River flow enhancement

* ban the sale of single flush toilets and incentivize their replacement with dual-flush ones and more efficient dual flush appliances; set up an outside market where old toilets can be provided to areas of the country not in the middle of a major drought

* get into the schools and start educating today's youth so they don't hose their driveways down

I have to say I was inspired by a book recommended by a DWP

I guess my main comment goes back to wise words my grandmother used to say:
"If a job's worth doing, it's worth doing well" and "Do it now!"

If the policy is there, we can accomplish anything. Waiting is not a policy, it is a recipe for disaster.

Our City is buckling under the failure of our infrastructure which includes many elements of the purchase and delivery of power and water by the DWP. The longer we wait, the more waste there will be through patching and lack of a technologically current approach to issues.

You need to be fast, you need to be aggressive. Read Let There Be Water (recommended by a DWP representative) and Bird on Fire about the crises Phoenix is facing.

San Diego has a desalinization plant coming online and is, I understand, already implementing direct potable reuse. LA needs to move fast to catch up.

13-2
Cont'd.

You need to address the above AND:

* incentivize local sourcing of water by factoring ALL costs of importing water from the Owens Lake, Colorado River and other sources into consumer price; subsidies for lower income residents should be provided while overuse should incur significant penalties

* provide mandates for farming operations to move to drip irrigation and crops appropriate for a semi-desert, refuse water for leaching of alkaline soils and those naturally high in salts as well as high-water demand crops

* immediately OPPOSE the Governor's 'Twin Tunnels' project which is a giveaway to Big Ag interests that supported his election and their unsustainable operations; just because the MWD thinks it can profit off of it does NOT make it acceptable

* refuse ANY water for fracking; not only does it use huge, unsustainable quantities, frackers add chemicals they refuse to identify but are known to be toxic which then soak into our groundwater; and the practice has been tied to rising incidences of earthquakes from Oklahoma to Australia as well as risking people living near operations (why do workers wear hazmat suits if it is not considered dangerous?)

Feel free to contact me with any questions or concerns

Liz Amsden
5158 Almaden Drive
Los Angeles, CA 90042
LizAmsden@hotmail.com

Comment Letter 13: Amsden, Liz

Response 13-1

The commenter remarks on the format of the Draft Environmental Impact Report (EIR), particularly in relation to providing a summary of the key points from the Draft EIR. Article 9, Sections 15120 through 15132, of the California Environmental Quality Act (CEQA) Guidelines outline the contents required to be contained within an EIR. As stated in Section 15120 of the CEQA Guidelines, an EIR must contain the information outlined in Article 9, but the format of the document may be varied. Section 15122 of the CEQA Guidelines requires that an EIR contain a table of contents or an index to assist readers in finding the analysis of different subjects and issues. The commenter is referred to the Table of Contents of the Draft EIR, which outlines the various components of the document and is organized by Chapter, section, and subsection to guide the reader to the page numbers of the analyses they are interested in reviewing.

Section 15123 of the CEQA Guidelines requires that an EIR contain a brief summary of the proposed actions and its consequences. Accordingly, the Draft EIR contains an Executive Summary, which includes an overview of and background related to the Proposed Project; the purpose, need, and objectives of the Project; and a description of the proposed facilities. Table ES-1, Summary of Environmental Impacts and Mitigation Measures, on pages ES-14 through ES-28 of the Executive Summary of the Draft EIR provides a summary of the potential environmental impacts associated with the Proposed Project, the level significance of the impact before the implementation of mitigation measures, all mitigation measures that proposed to reduce or avoid potential impacts, and the level of significance of the impact after mitigation. The Executive Summary also provides an explanation of the scoping process and how issues raised by agencies and the public were incorporated into the analyses contained within the Draft EIR (see pages ES-12 and ES-13 of the Draft EIR). A discussion of the proposed alternatives, how those alternatives may mitigate potential impacts associated with the Proposed Project, and the selection of the Environmentally Superior Alternative, is included in subsection ES.10, Alternatives to the Proposed Project, beginning on page ES-29 of the Draft EIR.

Response 13-2

The commenter lists numerous suggestions regarding the implementation and use of recycled water systems and other water conservation measures. The suggestions are noted; however, this comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. Therefore, no further response to this comment is provided. Notwithstanding, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment Letter No. 14

DATE: July 11, 2016

TO: City of Los Angeles (City), Department of Water and Power (LADWP)
111 No. Hope Str., Room 1050, LA, CA 90012
ATTN.: Nadia Parker Nadia.Parker@ladwp.com

cc: Los Angeles Department of Public Works Bureau of Sanitation (LASAN)
Los Angeles County Flood Control District (LACOFCD)

FROM: Dr. Tom Williams
Citizens Coalition for A Safe Community
ctwilliams2012@yahoo.com 3233-528-9682
4117 Barrett Road, LA, CA 90032-1712

SUBJECT: Los Angeles Groundwater Replenishment Project
Draft Environmental Impact Report (DEIR) SCH No. 2013091023
EIR-16-007-WP-NOTICE OF AVAILABILITY (NOA)...(EIR)...PROJECT

RE: Comments on Adequacy and Completeness of EIR

We have reviewed and prepared comments regarding the adequacy and completeness of the Draft Environmental Impact Report (DEIR) for the proposed Los Angeles Groundwater Replenishment Project (GWRP). Unfortunately as indicated below, we find the DEIR as seriously deficient as to adequacy and completeness and request that the DEIR be substantially revised and recirculated as either a new DEIR or a major Supplemental / Subequent DEIR (S-DEIR). Continued CEQA processing of the current DEIR and eventually certification may lead to further judicial review. 14-1

Project Description. The Project description avoids adequate discussions of the related projects for recharging rather than injecting purified water and avoids an adequate description of the Goals/Objectives-Purposes/Needs for the project, other than "reliability" and "cost-effectiveness". Although financial and employment aspects are vaguely mentioned and indirectly referenced, no financial setting, assessment or mitigation is discussed and either all references must be removed or discussed adequately. 14-2

Important comments are largely focused on the inadequate discussion in setting and assessments of groundwater quality, volumes, composition, uses, and current and future uses of the groundwater without and with purified water which will be contaminated by poorer quality groundwater and eventual need for additional treatment of the contaminated purified local water source. Similarly the discharge and disposition of the residual treatment effluents from both the Tillman purification process and the groundwater well treatment facilities is not discussed. LADWP has several projects planned in and around the Arleta community aimed at replacing aging infrastructure and developing the City's local water supply through the expansion of recycled water, stormwater capture and groundwater remediation. 14-3

All of these new distributed water supply facilities are located in the seismically active areas near and east of the I-405 and thereby are critical to future, post-earth quake survival, which is not adequately discussed, assessed, or mitigated. Especial concerns exist for the pipeline flanging and connections to thrust blocks, pump stations/pumps, and well head/pumps which represent widespread point of failure during earthquake movements and ground failure. These risks are not fully mitigated in order to maintain supply following earthquakes. 14-4

Because of the more distributed system, more general operational and maintenance issues arise regarding simple maintenance and capital replacement which as demonstrated by current rate/maintenance concerns has slipped into a "Repair Maintenance" approach rather the "scheduled" or "preventive" approaches. No indication is provided as to the long term maintenance or "life of project" of the overall project and it many distributed components. Given current approaches, all facilities must be provided with demonstrated maximum expected life rather than initial costs of construction/installation. 14-5

***p.ES-8 ES.5 Project Purpose, Need, and Objectives*.** The **primary objective and fundamental purpose** of the Proposed Project is to supplement the City of Los Angeles' local potable water supply through GWR with up to 30,000 AFY of purified water in order to reduce dependence on imported water and diversify the City's water portfolio, thereby increasing system reliability and sustainability....
The preparers have confused the NEPA/CEQA requirements for Goals/Objectives and Purposes/Needs and appear to confuse the preparers and Public reviewers. Then preparers use "supplement" in order to avoid "provide" or "add to" which all clearly indicate that additional water supply of 30,000 AFY will be the purpose or goal of the project, enough for 26.8MGD, 250,000 residents, one LACity council district, and 60,000 dwellings without importing any new water. 14-6

Project Components. At various points in the Project Description references are made to various facilities of LACity Department of Public Works, Bureau of Sanitation without a listing of all facilities required for the complete operations of the "Project", e.g., residual/brine/treatment waste outfall line and disposition at Hyperion; DWP water wells and treatment facilities for the groundwater containing purified water along with diverted/recharge stormwater, disposition of residuals/muck from the diverted stormwater, etc. 14-7

The entire Project Description requires major revisions, rewriting and expansion.

Alternative: Direct Potable Reuse - DPR. The DEIR is incomplete as the DEIR does not consider within the time frame of construction, e.g., 2017-2020, the expected changes of regulations regarding the direct reuse of "purified wastewater" (DPR) reflecting the growing trend in local reuse and water supplies. 14-8

Growth Inducement: The DEIR is incomplete as the DEIR does not consider that the new local source of purified water supply as independent of the very large investment of physical facilities for supply of imported water supplies and their continued presence and availability for supplying additional water for additional growth especially in the San Fernando Valley area and along the LACity/I-210 corridor from Granada Hills south through Tujunga. Claims of operational exclusion of use of such capacities run counter to the general requirements of EIRs to assume maximum physical capacities and their environmental effect unless the physical capacities of exiting imported water facilities is physically removed as mitigation or compensation. The DEIR is incomplete and must be reviewed and supplemented for recirculation and public comment. 14-9

Environmental Justice: The DEIR is incomplete as the DEIR does not consider that the new local source of purified water supply can effectively be used south of say SR-2 and would not become part of the general DWP-wide water supply. As the San Fernando Valley sources of the purified water supply is supplied effectively, solely by imported waters and are socially and economically different from those DWP customers south of SR-2 which will benefit from the new source of local purified groundwater the potential for differences in the quality of source water arises and has not been considered or assessed. The DEIR is incomplete and must be reviewed and supplemented for recirculation and public comment. 14-10

Comment Letter 14: Williams, Dr. Tom 3

Response 14-1

This comment includes introductory remarks and, while the commenter states a general concern regarding the adequacy of the Draft Environmental Impact Report (EIR), no specific concerns or questions regarding adequacy are raised. Therefore, no further response to this comment is provided.

Response 14-2

The commenter states that there is inadequate discussion of related projects for recharging groundwater. Please refer to Response 12-4 regarding the discussion of related projects.

The commenter also states that the Draft EIR provides inadequate discussion of the purpose, need, and objectives of the Project other than reliability and cost-effectiveness. The commenter is referred to Chapter 1, Introduction, pages 1-1 and 1-2 of the Draft EIR for background discussion regarding the purpose and need for the Project and its relationship to numerous other policy and planning initiatives related to water supply for the City of Los Angeles. While cost and reliability are important considerations for the project, as discussed, environmental sustainability is also a major consideration in the development of local water supplies that the Proposed Project would support. The commenter is also referred to Section 2.4, Project Purpose, Need, and Objectives, beginning on page 2-15 of the Draft EIR, for a discussion of the need for the Project, the overall purpose of the Project, and the specific objectives of the Project. While cost-effectiveness and reliability of water supply are important considerations underlying these objectives, as discussed, environmental sustainability reflected in the reuse of wastewater and the reduction in the use of imported water are also fundamental aspects of the Project.

The commenter also indicates that the discussion of financial and employment aspects of the Project in the Draft EIR is inadequate. Economic effects are not one of the issue areas required in an environmental document under the California Environmental Quality Act (CEQA). As described in CEQA Guidelines Section 15382, an environmental document needs to identify significant adverse changes in the physical environment that are likely to occur as a result of implementation of the Proposed Project. CEQA Guidelines Section 15382 further states that, “An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.”

As discussed in Chapter 1, Introduction, of the Proposed Project, dependence on imported water is costly. As such, cost-effectiveness has been considered in the development and implementation of the Proposed Project. Pursuant to CEQA Guidelines Section 15382, the potential for the Proposed Project to result in impacts to the physical environment is evaluated throughout Chapter 3, Environmental Setting, Impacts, and Mitigation, of the Draft EIR. The Draft EIR does not identify any economic changes related to a physical change that would result in a significant environmental impact with implementation of the Proposed Project. Thus, and assessment of economic or financial changes is not warranted in the environmental analysis of the Proposed Project.

Response 14-3

The commenter expresses the opinion that there is inadequate discussion regarding groundwater quality, volumes, and use, both in relation to existing conditions and future conditions with or without the Proposed Project. However, contrary to this comment, the Draft EIR contains extensive discussion of groundwater in Section 3.9, Hydrology, Water Quality, and Groundwater. This includes a description of the San Fernando Groundwater Basin (SFB) relative to its areal extent, depth, geologic formations, storage capacity, and rate and direction of subsurface flows. This discussion also identifies the recharge sources for the SFB, the water extraction rights held by the Los Angeles Department of Water and Power (LADWP), and the location and pumping capacity of LADWP production wells that would be influenced by the Project. Water quality discussions identify the geochemical characteristics of the groundwater in the SFB, total dissolved solids, contamination from industrial chemicals and nitrates, and salinity. Beneficial uses identified for the SFB in the Draft EIR under the Regional Water Quality Control Board (RWQCB) Basin Plan include Municipal Supply, Industrial Supply, and Agricultural Supply.

The Draft EIR, beginning on page 3.9-22, addresses the potential impacts to groundwater quality from the Proposed Project. It was determined that the purified water would meet or exceed the requirements of Title 22, Article 5.1 for Indirect Potable Reuse: Groundwater Replenishment – Surface Application, and that that the quality of the purified water would be higher than the water in the receiving aquifer. As discussed on page 3.9-23 of the Draft EIR, the Project would increase groundwater supplies in the SFB, which have been depleted from the effects associated with urban development:

> As part of the Groundwater Replenishment Master Planning Report, several groundwater model simulations were developed using the current version of the San Fernando Basin Groundwater Model (SFBGM) to numerically assess the potential effect of the Proposed Project on the SFB and the potential to meet all regulatory requirements…The additional recharge of 30,000 AFY [acre-feet per year] of recycled water would increase groundwater levels in the vicinity of HSG [Hansen Spreading Grounds] and PSG [Pacoima Spreading Grounds], which results in a beneficial effect for groundwater supply.

It was also noted in Section 3.9, that based upon the simulations of the recharge of and pumping from the SFB, the amount of spreading of purified water at the HSG and PSG in a given period or year would need to be limited depending on the amount of stormwater spreading during the same period or year in order to avoid groundwater mounding. This would be achieved by coordination with the Los Angeles County Flood Control District and closely monitoring groundwater levels. However, it is still anticipated that in most years, a total of 30,000 AFY of purified water could be spread at the two spreading grounds.

Since the purpose of the Draft EIR is to assess the potential impacts of the Proposed Project in relation to the conditions that exist prior to the anticipated implementation date of the Project, the EIR did not, as requested in the comment, assess the future use of the SFB in absence of the Project other than the indication under the No Project Alternative (page 5-44 of the Draft EIR) that groundwater replenishment of the SFB using purified water would not occur and, therefore, the local water supply would not be supplemented accordingly.

The commenter also states that the purified water that enters the SFB may become cross-contaminated by contact with existing contaminated water within the basin, creating the need for

additional treatment of contaminated purified water at extraction wells. As discussed in the Draft EIR, the City of Los Angeles is pursuing a number of parallel strategies to achieve its goals of increasing local water supplies and decreasing imported water supplies. As stated on page 1-1:

> In response to these challenges related to traditional imported water supplies, the City has embarked upon an aggressive effort to maintain reliable and sustainable sources of water. Long-term strategies outlined in the 2010 Los Angeles Urban Water Management Plan (UWMP) intended to "meet the City's water needs while maximizing local resources and minimizing the need to import water" include increasing water conservation, increasing water recycling, enhancing stormwater capture, and accelerating groundwater cleanup.

Therefore, it is recognized by the City that in order to achieve the desired level of local water supply (meeting 50 percent of total demand by 2035), it will require not only conservation and increasing groundwater recharge via replenishment with purified recycled water and stormwater capture, but treatment to remove contamination from the SFB to restore its beneficial use as a drinking water aquifer. As mentioned on pages 5-2 through 5-3 of the Draft EIR, these various elements (i.e., conservation, stormwater capture, groundwater replenishment, and groundwater cleanup) are not alternative means to achieve the local water supply goals but are complementary components of the integrated strategy identified in the UWMP.

With respect to existing groundwater contamination, LADWP has initiated the analysis of individual response actions, consistent with the National Contingency Plan, to respond to existing contaminant releases in groundwater that affect certain wells in the SFB. These actions supplement the response actions being overseen by the U.S. Environmental Protection Agency and the Los Angeles RWQCB. LADWP anticipates that these response actions will remove contaminant mass, minimize the further spread of the contamination, and treat water to restore LADWP's capability to operate its existing well fields in a manner the fully protects public health and the environment. This would allow for the use for potable purposes of the increased groundwater supplies that would be provided by the Proposed Project.

The commenter further contends that the discharge and disposition of the residual treatment effluents from the purification process and the groundwater well treatment facilities are not discussed in the Draft EIR. However, the treatment byproducts of the water purification process are addressed in numerous locations in the Draft EIR. As discussed on page 2-34:

> Backwash, brine, and spent clean-in-place solutions are byproducts of the AWPF [Advanced Water Purification Facilities] treatment process. Backwash is water used to clean the MF [microfiltration] strainers and MF membranes. Brine is generated from the RO [reverse osmosis] filtration process. Spent clean-in-place solutions are created by regular cleanings of both the MF and RO processes. MF backwash would be diverted from the AWPF into the DCTWRP [Donald C. Tillman Water Reclamation Plant] in-plant sewer for treatment at DCTWRP or Hyperion Treatment Plant. A new 3,000-foot-long, 24-inch-diameter pipeline would be constructed to transfer the brine from the proposed AWPF to the existing VORS [Valley Outfall Relief Sewer] located in Victory Boulevard. Once discharged to the VORS, the brine would combine with other DCTWRP biosolids and flow to the Hyperion Treatment Plant via the La Cienega San Fernando Valley Relief Sewer for further processing.

Hyperion Treatment Plant would have the capacity to treat this brine because, after Project implementation, a substantial amount of wastewater that currently bypasses DCTWRP and is

conveyed to Hyperion would now be treated at the AWPF at DCTWRP and utilized for groundwater replenishment. As discussed on page 3.9-25 of the Draft EIR:

> [O]nly a single 40-mgd [million gallons per day] phase of DCTWRP is currently operated at a given time because the demand and infrastructure for recycled water is insufficient to warrant operating both phases simultaneously. The wastewater that would otherwise reach DCTWRP via the AVORS [Additional Valley Outfall Relief Sewer] and East Valley Interceptor Sewer (EVIS) and be treated in the second 40-mgd phase instead bypasses the plant and is currently conveyed to Hyperion Treatment Plant in Playa Del Rey, where it undergoes a secondary level of treatment and is discharged into Santa Monica Bay. With operation of the Project, this wastewater would no longer be conveyed to Hyperion Treatment Plant and would instead be treated at DCTWRP.

As discussed on page 3.16-1 of the Draft EIR:

> The Hyperion Treatment System (HTS) is owned and operated by LASAN [Los Angeles Department of Public Works Bureau of Sanitation] and includes treatment plants, outfalls, and numerous sewer connections and major interceptors. Treatment plants within the HTS include Hyperion Treatment Plant (HTP), DCTWRP, and the Los Angeles-Glendale Water Reclamation Plant. Both DCTWRP and Los Angeles-Glendale Water Reclamation Plant are wastewater reclamation plants that treat to tertiary levels and discharge wastewater generated to the HTS, effectively removing or extracting flows and thereby reducing wastewater flows at HTP. HTP has a daily average flow of 362 mgd with the capacity to accommodate 450 mgd.

In relation to the discharge and disposition of effluent from groundwater treatment wells, as mentioned in the comment, the primary effluent would be treated drinking water, which would enter the LADWP distribution system. Other effluent would be relatively minor amounts of backwash process water, which would be drained into the existing City sewer system. However, as discussed above, these treatment wells, as well as planned stormwater capture facilities, are not a component of the Proposed Project, and therefore, they are not addressed in the Draft EIR.

Response 14-4

The commenter expresses the opinion that the Draft EIR does not adequately discuss the seismic risk to the Project. The Draft EIR acknowledges that the Proposed Project is located within a seismically active region, and like all locations throughout southern California, is subject to strong seismic ground shaking. As stated in Chapter 3.6, Geology and Soils, on page 3.6-8 of the Draft EIR, the Proposed Project would be designed and constructed in conformance with all applicable design standards, including appropriate temporary excavation shoring measures during construction, in accordance with the City of Los Angeles General Plan Safety Element and Municipal Code, and the California Building Code. With adherence to all applicable state and local building standards and codes, impacts related to strong seismic ground shaking would be less than significant.

Response 14-5

The commenter states that a scheduled and preventive maintenance approach, rather than a "repair maintenance" approach, is important to maximize the life of the Proposed Project facilities. This comment does not state a specific concern or question regarding the adequacy of

the environmental impact analysis in the Draft EIR. Therefore, no further response to this comment is provided. However, the comment is noted and will be forwarded to the decision-making bodies for their review and consideration.

Response 14-6

The commenter states that the preparers of the Draft EIR have confused the requirements of CEQA with those of the National Environmental Policy Act (NEPA) relative to Project objectives and purpose. Section 15124(b) of the CEQA Guidelines requires that the project description include a statement of the objectives sought by the proposed project and that the statement of objectives should include the underlying purpose of the project. In addition, to provide further background and context for the reader of the Draft EIR, a discussion is provided of the need for the Project based on increasingly less reliable, costly, and unsustainable imported water supplies for the City of Los Angeles. There is no restriction of such a discussion of need in an EIR under CEQA.

The commenter also asserts that the preparers use of the term "supplement" to avoid the terms "provide" or "add to" in an apparent effort to obscure the increase in water supplies that would be realized from the Proposed Project. The commenter presents no evidence to support this assertion or that the environmental impact analysis in the Draft EIR is inadequate. The Draft EIR uses the term "supplement" to mean "add to," as used in the context of increasing local supplies such that imported supplies would be decreased. As stated under the Project Objectives, listed in the Executive Summary on page ES-9 and Chapter 2, Description of the Proposed Project, on page 2-16 of the Draft EIR, "Specific objectives related to the fundamental purpose of the Project to increase local GWR [groundwater replenishment] to help reduce dependence on imported water include [among other objectives] providing up to 30,000 AFY of purified water for GWR in the SFB."

Relative to the comment that the Project is intended to limit any additional imported supplies of water (rather than commensurately reducing existing imported supplies) in order to support 60,000 new dwelling units in the City, see Response 14-9 below regarding the growth inducing effects of the Project.

Response 14-7

The commenter states that the Draft EIR does not include a listing of all the Project facilities. As discussed in Chapter 2, Description of the Proposed Project, on page 2-16 of the Draft EIR:

> To achieve the GWR goal, the Proposed Project would capitalize on existing facilities, including the existing DCTWRP, which has currently underutilized capacity to provide the recycled water influent necessary for the proposed AWPF; the existing 10-mile EVRWL [East Valley Recycled Water Line] interconnecting DCTWRP and HSG, which has capacity to transport the required volume of purified water to support the GWR objective; and the existing HSG and PSG, which have available capacity to accommodate the spreading of purified water for GWR. While the use of these existing facilities would provide for a number of the major components of the Proposed Project, several new facilities would also be required. These would include an AWPF and support facilities located at DCT SE [the southeast corner of the DCTWRP complex]; a new 3,000-foot brine pipeline to transport the brine flow from the new AWPF to an existing sewer main for processing at the Hyperion Treatment Plant; three new pumps at the existing Balboa Pump Station, also located in the

> southeast corner of DCTWRP; approximately 2.5 miles of new pipeline to transport purified water from the EVRWL to PSG; and new outlet and gate structures at HSG and PSG.

A comprehensive discussion of these facilities is provided in the Draft EIR starting on page 2-17. Relative to the handling of residual byproducts of the water purification process, the commenter is referred to Response 14-3 above.

Response 14-8

The commenter states that the Draft EIR is incomplete because it does not consider regulatory changes that may occur in the future regarding Direct Potable Reuse (DPR) of purified water (i.e., the introduction of purified water directly into the water distribution system without the intermediary step of groundwater replenishment). With DPR, the conveyance and replenishment components of the Proposed Project may not be required. However, as of the writing of this Final EIR, the State of California still prohibits DPR, and, therefore, the timing and nature of any regulatory approval of DPR is speculative. Relative to the consideration of alternatives to the Project, in accordance with CEQA Guidelines Section 15126.6(a), an "EIR is not required to consider alternatives which are infeasible." Furthermore, in accordance with Section 15126.6(f)(3), an "EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative." As such, the Proposed Project must be designed and analyzed in accordance with existing regulations, including Title 22, Article 5.1 of the California Code of Regulations, which regulates the application of purified recycled water for indirect potable reuse via groundwater replenishment.

Response 14-9

The commenter contends that the Draft EIR is incomplete because it failed to consider that the Proposed Project represents a new water source that would increase the City's overall water supplies and thereby potentially induce growth within the City. However, as discussed below (and throughout the Draft EIR), the explicit purpose of the Proposed Project is to increase local water supplies through groundwater replenishment in order to offset increasingly less reliable and unsustainable imported supplies by an equivalent amount. Thus, the overall water supply of the City would not be increased by the Project.

Relative to the commenter's assertion that as a general requirement the Draft EIR must assume the maximum physical capacity of imported water delivery facilities when establishing the City's total supply of water (and thus the potential of the Project to add growth-inducing supplies), more critical factors are involved in determining the amount of water available for importation than merely existing infrastructure. As discussed on page 2-15 of the Draft EIR:

> Although imported water resources have served the City for over a century, several factors have converged that threaten the long-term reliability of these supplies. Climatic conditions, including consecutive years of below historically average snowfall, and environmental commitments have severely impacted imported water supply sources, as explained below.
>
> The City's right to import water from the Eastern Sierra is based on approximately 185 water rights from various rivers, lakes, and creeks in the Mono Basin and Owens River watershed. The City also owns the majority of land (approximately 315,000 acres) and associated riparian water rights in the Owens

> Valley. The Los Angeles Aqueduct system deliveries from the Eastern Sierra have historically varied with rainfall and snowpack conditions. However, over the last two decades, the City's water deliveries from the aqueducts have also been substantially reduced due to reallocation of water for environmental mitigation and enhancement activities. Among these are commitments related to the State Water Resources Control Board's Mono Lake Decision, which reduced LADWP's ability to export water from the Mono Basin from 90,000 AFY to 16,000 AFY; implementation of the Owens Lake Dust Mitigation Program, according to which the LADWP is currently delivering up to 95,000 AFY to the lake; implementation of the 1997 Memorandum of Understanding (MOU) between LADWP and the MOU Ad Hoc Group, which commits LADWP to supply 1,600 AFY for various environmental mitigation efforts; and the rewatering of the Lower Owens River, which reduces water exports by approximately 17,000 AFY. These actions have resulted in a total loss of up to 188,000 AFY of water imports from the Eastern Sierra.
>
> MWD's [the Metropolitan Water District of Southern California] sources of water (the Colorado River, the State Water Project, local surface and groundwater storage, and stored/transferred water from Central Valley and Colorado River agencies) are subject to great uncertainty due to climate variability and environmental issues. Environmental conditions in the San Francisco Bay/Sacramento-San Joaquin Delta led to a Federal Court decision that resulted in MWD receiving up to 30 percent less of the previously anticipated State Water Project deliveries. Between April 2009 and April 2011, MWD implemented an allocation plan that limited supplies to member agencies and imposed penalties for exceeding water usage targets. Based on recent mandatory conservation orders from the State of California, MWD has also implemented an additional 15 percent average reduction in wholesale water deliveries to member agencies.

In addition to these obligations and restrictions, circumstances entirely beyond the City's control related to climate and weather have, and will continue to, severely impact imported water deliveries in any given year. For example, due to unprecedented drought conditions, the City, which has historically relied on imported water during summer months, took no deliveries of water from the Owens Valley from May through October 2015. Therefore, LADWP does not currently utilize its imported water facilities to maximum capacity to deliver water to the City, depending on circumstances wholly unrelated to infrastructure. As mentioned above, the Project is being proposed to increase local groundwater storage in direct response to these increasingly limited, less reliable, and environmentally unsustainable imported supplies.

The Project is a central component of the City's 2010 UWMP (recently updated in 2015 and formally adopted in 2016, after publication of the Draft EIR). Pursuant to the California Urban Water Management Planning Act as codified in California Water Code Division 6, Part 2.6 (Section 10610 et seq.), the UWMP requires California water suppliers (such as LADWP) to actively pursue the efficient use of available supplies. The LADWP UWMP facilitates the City's goal to provide reliable and sustainable water supplies to customers over the 25-year timeframe of the plan, which is updated in 5-year increments to account for changing circumstances. The current UWMP was developed as a direct response to persistent drought conditions and the need to reduce dependence on imported supplies of water. The Draft EIR states the following (starting on page 1-1) in relation the commitment to reduce imported supplies:

> In response to these challenges related to traditional imported water supplies, the City has embarked upon an aggressive effort to maintain reliable and sustainable sources of water. Long-term strategies outlined in the 2010 Los Angeles Urban Water Management Plan (UWMP) intended to "meet the City's water needs while maximizing local resources and minimizing the need to import water" include increasing water conservation, increasing water recycling, enhancing stormwater capture, and accelerating groundwater cleanup. These strategies are not alternative means to achieve local water supply goals but are complementary and mutually inclusive.
>
> Consistent with the Los Angeles Mayor's 2014 Executive Directive No. 5 (Emergency Drought Response) and 2015 Sustainable City Plan, these strategies will help achieve the goals of reducing per capita water use by 25 percent by 2035, decreasing the purchase of [Metropolitan Water District] imported water supplies by 50 percent by 2025, and sourcing 50 percent of the City's water from local supplies by 2035.
>
> In relation to recycled water, the UWMP established a goal to increase the use of recycled water within the City to 59,000 acre-feet per year (AFY) by 2035. As an implementing plan to achieve this goal, the 2012 Recycled Water Master Plan (RWMP), prepared jointly by LADWP and LASAN, determined based on the available capacity of recycled water treatment that 30,000 AFY should be dedicated to groundwater replenishment (GWR) to help enhance the City's ability to use groundwater from the San Fernando Groundwater Basin (SFB) aquifer. The 2012 Groundwater Replenishment Master Plan (GWRMP) further evaluated the facility requirements and siting factors related to achieving the GWR goal identified in the RWMP.
>
> The Proposed Project presented in this Draft EIR is an outcome of this planning process and reflects policies to reduce reliance on imported water, increase the use of recycled water, and replenish the groundwater basin in order to maintain a sustainable, safe, and reliable supply of potable water to meet the needs of the City of Los Angeles.

It should be noted that in the preparation of UWMPs, the California Urban Water Management Act requires that suppliers account for both current and projected population growth based on population projections from state, regional, or local service agencies (Sections 10631 and 10635 of the California Water Code). As mentioned on page 1-1 of the Draft EIR, "In accordance with the Administrative Code of the City of Los Angeles, LADWP is authorized and obligated to supply potable water to meet the needs of the City's residents, businesses, and other functions." In order to responsibly fulfill this obligation pursuant to the Urban Water Management Act, the needs of both the current population and the projected population must be considered.

The development the water demand projections and supply reliability for the UWMP (and, by extension, the determination of the need for and purpose of the Proposed Project) were predicated on the projected population in the LADWP service area over the 25-year timeframe of the plan (as determined by data from the Southern California Association of Governments 2012 Regional Transportation Plan). During this time, population in the service area is anticipated to increase about 11 percent, from about 3.99 million to about 4.44 million. Total water demand is expected to increase about 14 percent from less than 600,000 AFY to about

675,700 AFY under average weather conditions. Under dry year conditions, demand would increase to about 709,500 AFY. Therefore, the UWMP and, by extension, the Proposed Project are responsive to the projected natural growth in population anticipated over the next 25 years, but they would not induce this growth.

As discussed on page 3.10-13 of the Draft EIR, the Project is consistent with the City of Los Angeles General Plan policy related to wastewater infrastructure upgrades necessary to accommodate projected population growth, rather than induce unplanned growth. Consistency with the approved General Plan, which provides for orderly future development in response to anticipated population growth in the City (including the provision of adequate public services, such as wastewater processing and water supply), is the relevant determinant of a less than significant impact related to growth inducement.

Taking into account that the UWMP must respond to anticipated population increases as reflected in regional demographic forecasts, the plan nonetheless demonstrates the capability of LADWP to meet the total demand for water while reducing purchases of imported supplies by 2025 to an average of about 25 percent from a current baseline of about 55 percent. The plan also demonstrates the capability of LADWP to meet the total demand while increasing local supply sources by 2035 to over 50 percent of the total from a baseline of about 35 percent. This will be accomplished partially by aggressive conservation measures (including codes and ordinances related to water use) that will lower actual demand by 2040 to 565,500 AFY from a total demand without such measures of 675,700 AFY in average weather years and 709,500 AFY in dry years. In addition, the reduction in imported water and increase in local water supply will be achieved by expanding recycled water programs (including groundwater replenishment) and stormwater capture and implementing projects to remediate groundwater basins. Contrary to the assertion in comment, the Proposed Project, as discussed throughout the Draft EIR, is fully intended to reduce the City's dependence on imported water sources by increasing the local groundwater supply available for potable use, as opposed to increasing the overall supply of water while maintaining current levels of imported supplies.

Therefore, as stated on page 3.13-7 of the Draft EIR, in relation to growth-inducing impacts:

> The fundamental purpose of the Proposed Project is to reduce the City's dependence on imported water sources by increasing the local groundwater supply available for potable use. With Project implementation, imported water supplies would be offset by up to 30,000 AFY of purified water through groundwater replenishment, thereby supplementing the City of Los Angeles' local potable water supply and increasing system reliability and sustainability. The Proposed Project is consistent with the Los Angeles Mayor's 2014 Executive Directive No. 5 (Emergency Drought Response), 2015 Sustainable City Plan, and 2012 Recycled Water Master Plan (RWMP). Because the Project is intended to replace existing imported supplies, it would not increase overall water supplies to the City in a manner that would induce population growth.

Response 14-10

The commenter contends that the Draft EIR is incomplete because it does not consider, as an environmental justice issue, potential differences in the quality of potable water provided to various service areas in the City based on the source of the water. However, because of the interconnectedness of the City's water storage and distribution system, potable water derived from different sources (i.e., imported water from the LADWP Owens Valley Aqueduct system, Metropolitan Water District imported supplies, or groundwater from local aquifers) is served to

various areas throughout the City, depending on supply and demand at a given time. Nonetheless, the essential fact is that all potable water provided throughout the LADWP service area, regardless of its source, is highly regulated and strictly adheres to all federal and state safe drinking water quality standards. In this regard, it is self-evident that, irrespective of socioeconomic differences in communities throughout the City, customers who may receive the water that would be provided by the Proposed Project would gain no inherent environmental benefit nor suffer any environmental burden when compared to customers who may receive water from another source.

As stated in the Draft EIR, the Proposed Project is consistent with, among other planning documents, the 2015 Sustainable City Plan. Page 2-2 of the Draft EIR states:

> The Los Angeles Mayor's Sustainable City Plan establishes a planning framework for the City over the next 2 decades addressing not just the City's physical environment but also its economic health and a commitment to social equity as key elements of sustainability. A major component of the plan is an emphasis on local water sources as a critical factor to achieve environmental, economic, and social sustainability in the City…[T]he goals and strategies outlined in the Sustainable City Plan provide a foundation for and are consistent with other planning efforts in the City regarding water supply and quality, including the increased use of recycled water for groundwater replenishment (GWR) that would be facilitated by the Proposed Project.

3.2 Responses to Oral Comments Received at Draft EIR Public Meeting

A public meeting was held during the Draft Environmental Impact Report (EIR) public review period to solicit comments from interested parties. This Draft EIR public meeting was held on June 14, 2016, at 6:00 p.m. at Sepulveda Garden Center (16633 Magnolia Boulevard, Encino, CA 91436). At the meeting, an overview of the proposed project and the Draft EIR conclusions was presented. Following the presentation, the meeting was opened to oral public comments. Nine members of the public provided oral comments on the Draft EIR during the public meeting. A court reporter was present at this meeting, and a transcript of the comments received is provided below followed by responses to each public testimony (PT).

TAPE NUMBER: DWP LAGWR DEIR MEETING

[DWP LAGWR DEIR MEETING]00:00:04 MODERATOR

Okay, I guess we'll get started. I want to thank everyone for coming out tonight. Um, as I said a few minutes ago I recognize it's a Tuesday night, we're all real busy and, uh, your input's real important into this process. Um, a couple things before I get started. If anyone would like, uh, to use an interpreter we have an interpreter here tonight. Um, yeah, I'm gonna try this. Okay. I'll, uh, try to talk directly into the microphone. Is that better? Yeah, I felt like I was bending over trying to kiss this other mike and this is much better. Anyway, we have an interpreter here tonight. Um, the gentleman's in the back if anybody, uh, could use, would like to use an interpreter, uh, please take advantage of that.

[DWP LAGWR DEIR MEETING]00:01:09 MODERATOR (CONTINUED)

Um, this presentation should go pretty fast. But, um, and is what I would like to do is, I would prefer to wait and have questions and comments at the end of the presentation. If there is something, a burning need to get something answered as I go through I'm willing to do that but I think it'll be a little more efficient if we can wait till the end. Um, and then I think there's speaker cards that are in the back. And, uh, really the main purpose for those are so we have people's names and the correct spelling and also contact information as we send out, uh, notices of when we will be asking our board to consider the project and the availability of the final document, things like that.

PT-1

[DWP LAGWR DEIR MEETING]00:02:00 MODERATOR (CONTINUED)

So, um, the speaker cards, uh, would be good if you could fill those out. Also we are recording this tonight also so we will have a transcript of people's comments. Although I would encourage written comments. Sometimes I've been doing this for 28 years we get oral comments, we've gone from using, uh, flip charts to recording it but even then we often times we'll misinterpret kind of the intent or, or your main point of the comment. And, uh, when we're trying to respond to those. And so, uh, I would encourage you to submit your comments in writing, please.

[DWP LAGWR DEIR MEETING]00:02:43 MODERATOR (CONTINUED)

So anyway, um, kind of an overview of tonight's presentation. Is where, the reason we're here tonight really is to, uh, talk about the California environmental quality act and the process we're going through. We have prepared an environmental impact report for this project and we're in the middle of a 60-day public review and comment period. And then, uh, give an overview of the project, and then talk about the impacts, the environmental impacts that we addressed in the draft EIR. Uh, there, there were a few, uh, environmental impacts that, uh, we were able to reduce below the level of significance with mitigation. We've got some mitigation measures that I will present and project alternatives.

[DWP LAGWR DEIR MEETING]00:03:33 MODERATOR

And then, uh, we'll do the comments. Oops, uh. I'm not sure what I just did. Okay. So again, um, we're here tonight because, uh, we have a draft environmental impact report out, out for public review. Um, the SEQUA process or the California Environmental Quality Act is required for all discretionary actions, um, taken by a, um, a government body. It also is to inform the public and decision makers of the project and, uh, identify significant environmental impacts associated with that action. It also, um, requires that we, uh, once we've identified the significant environmental impacts consider feasible ways to avoid, reduce or mitigate those impacts.

[DWP LAGWR DEIR MEETING]00:04:33 MODERATOR (CONTINUED)

And where we can't, uh, mitigate the impacts and we still have some impacts is to look at or consider alternatives to the project that may reduce those unavoidable impacts. And, uh, and then provides an opportunity for the public to review and comment on the pro, uh, environmental issues. Now this is the process we've gone through. We've been working on it for, for a couple years now. Uh, we prepared what they call an initial study, it's a preliminary environmental checklist. And along with that we, uh, circulated a notice of preparation of an environmental impact report.

[DWP LAGWR DEIR MEETING]00:05:20 MODERATOR (CONTINUED)

And that was distributed, uh, back in September 2013. We held three, uh, scoping meetings, uh, during that period, in the fall of 2013. We went ahead and we considered the, the comments, uh, received during the scoping meetings. We went ahead and, uh, conducted our technical studies and we prepared the draft EIR. And that was distributed in May, uh, of this year. Last month. And we're currently here at number six, um, during the public review period of the draft EIR. We're about a month into the public review. We still have another approximate month, uh, until the comments are due in the close of the public review.

[DWP LAGWR DEIR MEETING]00:06:06 MODERATOR (CONTINUED)

Then we will respond to all of the comments and prepare a final environmental impact report which we would present to the board of water and power commissioners. We're at this point we anticipate it's gonna be at the end of this year, maybe November, December. And depending on the decision or the results of that consideration if they certify the document and approve the project we'll be filing a notice of determination shortly after that. So the preliminary object, or primary objectives and purpose of the project is to supplement the city of Los Angeles local potable water supply through ground water replenishment.

PT-1
Cont'd

[DWP LAGWR DEIR MEETING]00:06:59 MODERATOR (CONTINUED)

And with up to 30,000 acre-feed a year which is almost 10 billion gallons of water a year, of purified water and this is in, uh, order to help reduce our dependence on costly and unreliable imported water and to help diversify the city's, uh, water, water portfolio by developing a local, safe and reliable water supply thereby increasing the system of reliability and sustainability. So the overview of the proposed project is to replenish the San Fernando ground water basin with up to like I said, 30,000-acre feed of purified water from the Donald C. Tillman water reclamation plant.

[DWP LAGWR DEIR MEETING]00:07:54 MODERATOR (CONTINUED)

Is what that involves is the treatment, uh, we're gonna construct and operate a new advanced water purification facility, um, and related facilities that would provide additional levels of treatment of recycled water generated by, uh, the Tillman, uh, recycled water project or, uh, facility. And this will be done as proposed through, uh, addition of microfiltration and reverse osmosis. And then there's a conveyance component of this where we propose to use, uh, ten miles existing ten miles of, uh, 42-inch pipe. And then there would, uh, also involve construction of approximately two miles of 42-inch water pipe. Of this purified water from, from the Tillman plant to the existing spreading grounds.

[DWP LAGWR DEIR MEETING]00:08:50 MODERATOR

And then the third, uh, element of the project is, uh, some additional work that would be conducted at both, uh, the Hanson and the Pacoima sp-spreading grounds. So, just kind of to repeat a little bit of what I just said now that I have a map is for orientation purposes, here's the 101, the 405, the 18. We're over here. Uh, here's, uh, the Tillman, uh, water treatment plant. We have existing 42-inch, ten miles of pipe that goes up here to the Hanson spreading grounds. Um, then there would be a short brine line associated, new line right here in this area mostly on the, uh, Tillman facility about 300 feet on public road.

[DWP LAGWR DEIR MEETING]00:09:48 MODERATOR (CONTINUED)

And then an additional two miles of 42-inch line up Arleta. And then there'll be a, a little bit of work in this area at the spreading ground at Hanson and then at, uh, Pacoima spreading grounds. So some of the project facilities well, I just kind of explained it. There's gonna be work within, uh, Donald C., uh, Tillman complex. Uh, the recycled water project or pipeline and then some outlet structures at the spreading grounds at both Hanson and Pacoima. And this is going to be, uh, the treatment at Donald C., uh, Tillman facility. I just want to make sure I get everything right here.

[DWP LAGWR DEIR MEETING]00:10:45 MODERATOR (CONTINUED)

So anyway, uh, the advanced purification functions are, are gonna take place in this area here and it's gonna be new construction. And, uh, the maintenance building's gonna be here. It's a retrofit of an existing facility. There's going to be, uh, equalization tank. It's gonna be primarily underground. The function of this is, we get a lot of our flows at, at times of high water use in the mornings when people are showering, in the evening, maybe throughout the day, at the night, uh, a lot less use. So what we do is we take advantage of kind of storing some of that water and then that way the facility can operate 24/7 and, uh, then we have a warehouse that's gonna be a new facility, uh, uh, in this area here.

[DWP LAGWR DEIR MEETING]00:11:35 MODERATOR (CONTINUED)

And then a brine line. It's not on here. It's on probably the next slide is gonna go up here along existing roads and up through this area. I think it's the next. The brine line is going to end up into this, this is an existing sewer line that brings water into this facility and heads down to Hyperion. And like I said, that will be on about 300 feet of public road. The rest will be within the facility. Um, conveyance system. And so that was the treatment. Uh, everything done within, uh, Tillman's facility. And then for conveyance it's going to be, there's an existing 42-inch pipeline that gets us up into this area, and then we're proposing approximately two miles of 40-inch pipeline up Arleta Avenue.

PT-1
Cont'd

[DWP LAGWR DEIR MEETING]00:12:51 MODERATOR (CONTINUED)

Okay, and then at Hanson is what we're proposing is some improvements there. And that would include, uh, basically a, a new outlet structure and about 200 linear feet of new pipeline within Hanson. And then over at Pacoima the line would come up here, Arleta, into the facility. We have an outlet structure here. We have, um, Devonshire right here so we have an outlet for the southern half and the northern half and then it would also include about 1500, uh, feet of new pipeline within the spreading grounds themselves. (UNINTELLIGIBLE) No, we have not. We put in the pipeline as part of a proposed project a few years ago, well, a couple decades, decade ago and we have not been pumping water. It is right now it's, there's some improvement's been done in the area but it's storm water capture.

[DWP LAGWR DEIR MEETING]00:13:59 MODERATOR (CONTINUED)

Uh, so anyway, here's the pro-project construction schedule. Um, this area here, all of this stuff down to here is going to be within the Tillman facility and you can kind of see it's going to start if everything goes well and the project gets approved, um, would take place until about 2021. And then or actually further out. There's even going to be some stuff going out to 2022. This is the offsite construction which I think most people would be possibly concerned about. And it's the water pipeline project of Ar-Arleta. About a year and a half, maybe a little less than that but we wanted to be somewhat conservative. And then the improvements at the spreading grounds.

[DWP LAGWR DEIR MEETING]00:14:48 MODERATOR (CONTINUED)

Okay, now as we went through, uh, the initial checklist, um, we looked at the environmental factors and there are three that we determined significant, uh, although temporary. And then once you, uh, introduce mitigation measures they become less than significant. And that would be in the area of air quality, biological resources and cultural resources. And then there are two that will be significant and unavoidable even after we apply mitigation. And that would be noise and that's basically at the work, uh,

the area of the warehouse over here by a, within the Tillman facility and by the Japanese garden. And then the transportation and traffic along Arleta during construction.

[DWP LAGWR DEIR MEETING]00:15:42 MODERATOR (CONTINUED)

Growth inducing impacts there, there aren't any growth inducing impacts. We, we don't consider any of this growth, growth inducing. Yeah. So getting into the mitigation measures. Again, air quality. Uh, mitigation, uh, includes diesel powered construction equipment that meets the USCPA emission standards for biological resources. Um, the areas will be clearly designated for construction. And we'll be conducting, uh, the necessary biological surveys prior to the start of construction. And with cultural and archeological, paleontological monitoring of resources are encountered during construction and that would be monitoring ground disturbing activities, things like that.

[DWP LAGWR DEIR MEETING]00:16:37 MODERATOR

Noise. This is again one of those, uh, unavoidable, uh, temporary and unavoidable significant impacts. Uh, but we will use noise barriers, uh, um, the proper use of construction equipment, uh, noise, uh, reduce noise equipment. We will also have a public liaison, um, that can address construction noise. We'll put out, uh, public notification, door hangers, things like that, uh, when we are doing construction activities. And, uh, and we would limit construction hours and some of the, uh, truck routes. And consultation, ongoing consultation with, uh, the Japanese garden site administrator so they're aware of everything we're doing as, as it's going on.

PT-1
Cont'd

[DWP LAGWR DEIR MEETING]00:17:30 MODERATOR (CONTINUED)

Transportation, we will be developing a traffic management plan and, uh, regarding the construction on Arleta. And so basically I've, this just repeats what I've already talked about. Uh, the noise is really relative to the Japanese garden. Traffic and transportation are, uh, the pipeline up Arleta. Now, we, uh, because of the transportation and the noise we looked at some alternatives, see if there were ways that we could further mitigate or reduce or avoid, uh, those impacts. And so we looked at one of the alternatives, rather than use the advance water treatment was to do that at the Valley generating plant instead of at the, uh, Tillman plant.

[DWP LAGWR DEIR MEETING]00:18:28 MODERATOR (CONTINUED)

Um, some other things, expansion of the flow equalization tanks and pumps. Uh, which would be required if we were gonna go up to Valley. Um, it would also actually it might be easier rather than read this and then show you on the map what I'm talking about. I'm gonna go right to the map. And repeat what I was just, what was on the other, the previous slide. So if we go to Valley. See, we got Tillman here and we got this existing pipeline up to Hanson. And then the project was this pipe here. Now, if we go and instead of treating it here where we have a little brine line here and this, this is existing re, uh, recycled water coming up here and then for the advanced treatment we would have to put an additional pipeline down here and up into here.

[DWP LAGWR DEIR MEETING]00:19:30 MODERATOR (CONTINUED)

And the that brine line we would have to construct all the way down here and tie into the existing pipeline that goes to Hyperion. So it didn't reduce traffic impacts, if anything it, it made 'em worse. But you didn't have the same noise problems that we had over there. So, we're at the point now, uh, like I said, the draft EIR we're out in the public review period. We've been, uh, we're about 30 days into a 60-day public review period. Uh, usually we come out with a 45-day public review period but because of, uh, a couple holidays that we've had during this time we decided to be proactive and we went with a 60-day public review period and we have app-approximately about another month before comments, the review period ends.

[DWP LAGWR DEIR MEETING]00:20:28 MODERATOR (CONTINUED)
Uh, the document is available at some of the local libraries and there's in the notice of preparation and there's copies of it out on the table. Talks about what libraries they're available at. It's also available online at the DWP site. (UNINTELLIGIBLE) This here goes, well, once you get into this area then it, yeah, there will be a, (UNINTELLIGIBLE) okay. Yeah, so if you can get in the notices we've got a number of projects that are currently in an environmental review period. Okay. And we're being recorded so, no, and that's Nadia Parker. She works with me and she's actually, uh, going to be the one that you'd be submitting comments to. And, um, so anyway the comments we'll receive verbal comments, there's comment cards that I had mentioned earlier.

PT-1 Cont'd

[DWP LAGWR DEIR MEETING]00:21:45 MODERATOR (CONTINUED)
Um, but I would really encourage to submit written comments for the reason I stated at the beginning of the, uh, presentation. And you can also email comments. The comments will ultimately, should be submitted to Nadia Parker back there. Everybody had a chance to meet her. And, uh, there's the address and her email and, um, they should be submitted by July, the end of business on July 11th. Let me see I think that's the last slide. It is. And so with that I guess, um, I'll open it up to any questions or comments. And again, we are recording this so I, I'll, uh, how should I do this? I'll hand you, we have two microphones and so we'll be going around.

[DWP LAGWR DEIR MEETING]00:22:45 JACK HUMPRIVILLE
No. Um, you mentioned where, where is the 30,000 coming from? Is 23,000 Pacoima and 7,000 in Hanson. My name's Jack Humpriville. Los Angeles. So, myself, I'm a rate bearer, thank you. Okay, um, I'm not sure.

[DWP LAGWR DEIR MEETING]00:23:05 MODERATOR
Could you repeat the question, I'm sorry.

[DWP LAGWR DEIR MEETING]00:23:08 JACK HUMPRIVILLE
There was a slide up here that said 23,000, uh, acre foot were going to, um, um...

[DWP LAGWR DEIR MEETING]00:23:16 MODERATOR
Probably Hanson.

[DWP LAGWR DEIR MEETING]00:23:17 JACK HUMPRIVILLE
Well, what's, what's the other one? Arleta. And is 7,000 only going to Hanson if you could go back to your slides you could probably take a look at it.

PT-2

[DWP LAGWR DEIR MEETING]00:23:24 MODERATOR
Oh, okay. Why don't you introduce yourself, too. She's the engineer over the project. And we've got the environmental project manager and go ahead.

[DWP LAGWR DEIR MEETING]00:23:34 YOSHI
Hi, my name's Yoshi. Um, I'm the project manager for the ground water replenishment project and I know it's what you're talking about. So, we have a plan to spread up to 30,000-acre feet per year. Um, we're probably gonna spread about, um, 15,000 at each spreading grounds. However, each spreading grounds is limited. Hanson is limited, um, we estimate at 19,000. Pacoima is limited at 23,000. So those are the numbers that you saw. So those are, those are the maximum amount we could spread at either spreading grounds. L.A. County will be operating the spreading grounds so they'll be deciding how that water is spread based off their maintenance. They have a battery system for vector control that they use.

[DWP LAGWR DEIR MEETING]00:24:12 YOSHI (CONTINUED)
So what they do is they only fill, um, they'll fill maybe one or two basins at one time, shut it down, allow the water to infiltrate so that you don't have mosquitoes and other problems, um, at the spreading grounds and they'll operate different sections or different spreading grounds. Um, so what we're doing is providing the operational flexibility.

PT-2 Cont'd

[DWP LAGWR DEIR MEETING]00:24:30 JACK HUMPRIVILLE
Why is L.A. County involved? It's our water.

[DWP LAGWR DEIR MEETING]00:24:34 YOSHI
So it is our water. Um, L.A. County owns and operates the Hanson and Pacoima spreading grounds that we're using. Um, so they'll be on our behalf allowing that water to sink into the ground. But once it's in the ground, it is our water.

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[DWP LAGWR DEIR MEETING]00:24:50 MODERATOR
And, you know what? I kind of did a bad thing. They wanted speaker cards so I knew what order to take questions and I've seen about four hands and I don't know who I should call next. If, uh, I could speaker cards that would be helpful. Uh, no I'll talk from here. Do you have? Okay.

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[DWP LAGWR DEIR MEETING]00:25:18 ARTHUR PUDSLEY
Uh, my name is Arthur Pudsley, I'm the senior staff attorney with Los Angeles Water Keeper. I just wanted to thank you for this opportunity to comment. We'll be sending a, um, a follow-up letter but we had a few comments and questions based on our preliminary review of the EIR. Uh, Water Keeper is very supportive of the project. Um, it will provide 30,000-acre feed per year of ground water replenishment and represents a major commitment to indirect potable reuse. Uh, that being said, LAW would have preferred using treated water from Hyperion as the initial source for an IPR effort. But understands the constraints that led to the selection of water from Tillman.

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[DWP LAGWR DEIR MEETING]00:26:00 ARTHUR PUDSLEY
None the less, LAW urges, um, DWP to make, um, elimination of ocean discharges at Hyperion an important part of its water recycling efforts. The commitment to maintain base flow, turning to the EIR, the commitment to maintain base flows in the lakes and L.A. River is, we feel is very important to minimizing overall impacts on the river and the lakes. And then I just had a few quick questions or comments for the, as you're going through the final EIR and as I said, we'll be sending a more detailed letter. Um, we would like to see more information on how this project relates to the ongoing, um, ground water and soil remediation projects that are going on around the San Fernando Valley. I didn't really get a good sense of that from at least the first pass through the EIR.

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[DWP LAGWR DEIR MEETING]00:26:54 ARTHUR PUDSLEY (CONTINUED)
Um, specifically the, the concerns are two-fold. We have the potential for infiltrated water intercepting a contaminant bloom and then becoming itself contaminated. Which could reduce the potential benefits of the project or in the alternate, um, the treated wastewater could be so clean that it causes contaminants to leach out of existing soils, um, as happened down in Orange County a number of years ago. So we'd just like to, um, understand if you have any contingency plans for either of those two, um, eventualities.

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[DWP LAGWR DEIR MEETING]00:27:32 ARTHUR PUDSLEY (CONTINUED)
Um, the, uh, finally, uh, we believe that public education and outreach are going to be essential to support any long term viability of indirect potable reuse projects and eventually is our hope of direct potable reuse. Um, and so that the EIR should include an education and outreach plan.

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PT-9 Cont'd

[DWP LAGWR DEIR MEETING]00:27:57 MODERATOR
Good comments, thank you.

[DWP LAGWR DEIR MEETING]00:28:06 BARRY SILVER
Yes, uh, can you all hear me with the mike? I'm Barry Silver, president, Homeowners of Encino and by the way I'm delighted you've got 100 percent more people here then you had 22 years ago when you came out with the project and built the lines so we're making progress. Couple of major questions. These are the in form of comments so you don't have to answer them now. Number one, will your outreach go to the extent, okay, well, I can hold it. A little closer, okay. Will your outreach involve asking the rate payers, those people that use the water system whether they want to use the recycled water formally or denigrated we call toilet to tap, I'm not using that term but will the rate payers vote on it. In other words, is this a decision you're going to make or the public's gonna make to use the water. That's one point. And it's essential they vote on it.

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[DWP LAGWR DEIR MEETING]00:29:00 BARRY SILVER (CONTINUED)
I think this is gonna produce a quality water, I don't have much doubt about that. But then another issue has to do with you went over very quickly the growth inducing impacts. That has to be in the EIR because providing more water is gonna be a huge growth inducing element. It means more people and more business and so on which the infrastructure cannot maintain. With, because of traffic and so on. So that's a real important issue. Another issue I think that needs to have a closer look is the cost factor. Because what you just went over very quickly was the fact you're gonna use ultraviolet, reverse osmosis which is a high-energy consuming, uh, element so the water will come down from the North Valley by gravity flow. The customers will use it, the sewage goes into Tillman. Then it's gonna get pumped back up to the spreading grounds. They're gonna need electrical energy to pump all that water back.

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[DWP LAGWR DEIR MEETING]00:29:58 BARRY SILVER (CONTINUED)
And then, of course, you're gonna use RO which is a high intensitive. And then you're gonna finally dump the brine back into the ocean through Hyperion. So there's a lot of issues I won't go into now, it's in our document but I think you have to give a serious look about reaching out and you cannot make a decision with 20 or 30 people and a couple of three meetings. This is gonna become a huge problem if the public doesn't know the issues and vote on it. That's Homeowners of Encino, thank you.

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[DWP LAGWR DEIR MEETING]00:30:27 MODERATOR
Thank you for your comments. One thing, you brought up growth inducement now a second time. Um, you brought up several issues. But the growth inducement, we're not adding additional water, the idea is to replace the import of, of water. And so it's not additional water it's replacement of what we, but anyway. (TECHNICAL) And we're relying on river, uh, water from Metropolitan Water District coming down from the state water project, also the Colorado River and also out of the Owens Valley and so what we're doing is becoming less reliable on those imports and, and so, anyway, but good comment we'll address and respond do those comments.

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[DWP LAGWR DEIR MEETING]00:31:21 MODERATOR (CONTINUED)
I think this gentleman here was next.

[DWP LAGWR DEIR MEETING]00:31:25 MARK GOSICO
Yeah, my name is Mark Gosico and I'm with the San Fernando Valley Audubon Society. I've also been with RWAG for a few years. And I'd like to echo Jerry Silver's concerns first of all about the growth inducing impacts. I appreciate your comments on that subject but, uh, pardon me, I'm going to be skeptical about it. Uh, there are developments being planned all around the San, San Fernando Valley, uh, uh, there's litigation going on of one sort or another regarding those developments. Um, developers claim they have, uh, sources of additional water and they're lying about it. I've checked in multiple sources

PT-15

about that. So this is a very serious subject. It didn't appear on your initial ch-check list and, uh, this idea of contributing to grow is in every body's mind around the San Fernando Valley I'm sure. PT-15 Cont'd

[DWP LAGWR DEIR MEETING]00:32:18 MARK GOSICO (CONTINUED)
So, um, with that, um, I have one very simple question, I think. Um, and that has to do with the existing recycled water line. Uh, my question has to do with, is there water in it now and what happens to the water in it now? It sounds like that line will have to be flushed, uh, because it has recycled water that's not suitable for, uh, for, um, uh, spreading in the spreading grounds. So am I correct on that? That that line will have to be flushed and disinfected before it can be used, be used for, uh, advanced, uh, water?

[DWP LAGWR DEIR MEETING]00:32:49 MODERATOR
The line may need to be flushed because it's, uh, been vacant and, you know, there might be rust and other things. But the line, that pipeline has not been used.

[DWP LAGWR DEIR MEETING]00:32:59 MARK GOSICO
It's never been used?

[DWP LAGWR DEIR MEETING]00:33:02 MODERATOR
As far as I know it's never been used. He's talking about, no, the 42-inch that comes from Tillman up to... PT-16

[DWP LAGWR DEIR MEETING]00:33:12 MARK GOSICO
Up to the Valley generating station.

[DWP LAGWR DEIR MEETING]00:33:14 YOSHI
The 54-inch is being used to serve our recycled water customers. Um, it goes all the way up to the Hanson. Well, it goes all the way to the Hanson spreading grounds and then there's another line that goes onto the Hanson Dam Golf Course. There is a section from that, that juncture where it breaks off to go to the Hanson Dam Golf Course and our Hanson tank, um, that has been stagnant for awhile. So we'll have to take care of that. But that's within the Hanson spreading grounds, um, so it won't be, be noticeable. But, um, yeah, we actually are using that pipeline for our customers.

[DWP LAGWR DEIR MEETING]00:33:45 MARK GOSICO
So it will have to flushed out then.

[DWP LAGWR DEIR MEETING]00:33:46 YOSHI
We won't need to, we won't need to disinfect the pipeline because the tertiary quality water already qualifies for ground water replenishment. It's just limited in the volume that you can spread. That's why we're doing additional treatment. Um, so we'll increase that treatment so we can increase the volume. But because we're not serving water from that pipeline to our customers directly, this is not direct potable reuse, it's still indirect, we won't need to disinfect the line as we would have if it was a potable water line.

[DWP LAGWR DEIR MEETING]00:34:13 MARK GOSICO
Okay, I have one, one follow-up question on that. Uh, I'm not familiar with the, the, uh, type of material that that pipeline is, uh, constructed of and, uh, there's been a lot of concern in this city about, uh, corrosion and pipeline breakage and I'm just curious about the lifespan that you project for that particular pipeline using that kind of advanced treated water that has no minerals in it. It sounds like it will be very corrosive. PT-17

[DWP LAGWR DEIR MEETING]00:34:36 YOSHI
We will be adding minerals back into. You're right, purified water can be corrosive. It's the irony of purifying your water but we will be adding calcium or lime back into the water to prevent that corrosivity, um, and it is a ductile iron pipeline.

PT-17 Cont'd

[DWP LAGWR DEIR MEETING]00:34:53 MARK GOSICO
All right, thank you.

[DWP LAGWR DEIR MEETING]00:34:55 MODERATOR
And I'll leave my responses to the environmental issues and the technical questions I'll defer to Yoshi and sorry about that.

PT-18

[DWP LAGWR DEIR MEETING]00:35:07 ROBERT ROUGET
Good evening. I'm Robert Rouget with the Arleta Crime Watch Team. That new 42-inch line will be going right past my house. I actually welcome this system. I understand the needs of recycled water. It's not about just expansion, it's also about replacing the imported water which may not be there based on the projections of the future of the available water coming from, uh, central and northern California. So, but the, the thing that I wanted to, uh, uh address is I'm running across a lot of, um, skeptics regarding, uh, recycled water that comes specifically from sewage treatment plants.

PT-19

[DWP LAGWR DEIR MEETING]00:35:52 ROBERT ROUGET (CONTINUED)
You're looking at 73-year-old man that came from St. Louis, Missouri and our water comes from the Mississippi River. The water treatment plant is north of the city. The sewage treatment plant is south of the city. And that repeats itself and that includes Illinois and all the cities on the other side of it and none of us are dying back there yet that I know of except for old age.

[DWP LAGWR DEIR MEETING]00:36:15 ROBERT ROUGET (CONTINUED)
So, but what I wanted to recommend cause this is one thing that I think more education emphasis needs to be focused on and I'm gonna read, uh, what I scripted here. Specific lecture on recycled water from sewage treatments plants need to educate subscribers on the process and the success of other cities, e.g. Orange County that's been doing it for 10 years and I haven't heard of anyone that's died as a result of the water down there yet. As a matter of fact, one of the gentlemen here is from that area and I see he's quite alive.

PT-20

[DWP LAGWR DEIR MEETING]00:36:54 ROBERT ROUGET (CONTINUED)
Um, e.g. Orange County, they've been utilizing, uh, and AWPF similar system for quite some time now. And I, I think it would be very, um, helpful if you could have, uh, perhaps a separate, uh, lecture or presentation just so people have an understanding. The AWPF is not a simple system. It uses a lot of scientific and, and, um, of filtration and, and chemical processing system. And I would not be afraid to drink from the water at all.

[DWP LAGWR DEIR MEETING]00:37:34 MODERATOR
Thank you for your comments. Comment noted regarding public education.

2[DWP LAGWR DEIR MEETING]00:37:40 AREJELLA
Hi, my name is Arejella and I live in the city from Sylmar. But I actually have the opportunity to work a lot in Sun Valley. And so my concern is the actual mitigation for traffic. I notice on your note that says you just have to deal with it. Um, are you guys working with LAUSD because right at the Roscoe and Arleta is three different schools and I've gone there regular days is like bumper-to-bumper-to-bumper. Either starting to work late maybe later once school is in and maybe working with them to make it easy for, to ease the problem a little bit for the parents. I'm really concerned about that. It's three different

PT-21

schools. If you amount, if you put all those parents together and the amount of students, like a huge problem. So if I were you, I would be working together with the parent centers, with the principles and even, you know, LAUSD representative. That's what I suggest.

PT-21 Cont'd

[DWP LAGWR DEIR MEETING]00:38:36 MODERATOR
Thank you. A good comment. And I did kind of go over that fairly fast, the traffic management plan. There will also be coordination in, in developing that and also we will be notifying people. It's a moving impact but there'll be door hangers and people that, uh, people can, you know, the community residents can, uh, contact, uh, a person at DWP and, yeah. Often times around school, yeah, just a minute. Is what we can do is we work around, you know, the seasons or the time of day in close coordination. That's a good comment.

[DWP LAGWR DEIR MEETING]00:39:23 BARRY SILVER
Kaiser and others will be draining into this system and bringing unique pathogens. Now you're totally comfortable that that will not be a problem. The hospital sewage going into the line, going back to the spreading ground. Is that correct? You're totally confident.

PT-22

[DWP LAGWR DEIR MEETING]00:39:38 YOSHI
Yes.

[DWP LAGWR DEIR MEETING]00:39:38 BARRY SILVER
Okay, thank you.

[DWP LAGWR DEIR MEETING]00:39:42 MODERATOR
I don't know, um, again, we're trying to record this if, we can come back to you.

[DWP LAGWR DEIR MEETING]00:39:57 BYRON WEINSTEIN
My name is Byron Weinstein. I'm a retired hydrologic engineer from the Department of Water and Power, senior hy, hydrologic engineer and I'm quite familiar of the background of the Department of Water and Power history. Uh, I worked for the department for 47 years and so I know where a lot of bodies are buried. Uh, one of the things that the gentleman mentioned about, uh, the Mississippi River, this is a continuous process of people upstream taking water out of the Mississippi, using in a city, putting back in the Mississippi, the city downstream takes the water ad infinitum. So I take quite a bit of objection of the toilet to tap or, uh, toilet to tap comments that are, I, I see readily is that we don't do things like that, toilet to tap. It's a, it makes news.

PT-23

[DWP LAGWR DEIR MEETING]00:41:10 BYRON WEINSTEIN (CONTINUED)
Anyway, before the, before the city has a sewer system in the San Fernando Valley we had cess pools and septic tanks. And where do you think the water went? It went underground. Did we ever have any, uh, diseases or what have, recorded from that? No, we did not. It doesn't take much for water going underground to get purified into the system, into the ground water. There's quite a few feet of soil that it goes through and the bacteria gets killed. We also used to take water out of the L.A. River and put it what was known into the deep gallery spreading grounds which is just north of the, uh, cemetery at, uh, Forest Lawn Drive. Take the water out of the, out of the river and put it in the deep gallery wells which was an input in the ground.

[DWP LAGWR DEIR MEETING]00:42:16 BYRON WEINSTEIN (CONTINUED)
This is water that came right out of the river that had all of the trash and all of the manure and all of the, uh, debris that was in the river that we used to divert it from the thing and put it underground, never had a case of any problem with the thing. It went into the ground and got, got treated. Uh, we used to have a barrier in the L.A. River, wooden, that was built to divert water from the river into the spreading grounds

that used to be where the Department is currently building a, is finished building it, uh, on their finals stages the, the reservoir where the deep gallery wells used to be, uh, along the freeway. There was a barrier in the, in the river and it was made out of wood. And why was it made out of wood is because the river structure was built to carry storm water and we could not put a permanent dam, it had to be destroyed each year, okay? PT-23 Cont'd

[DWP LAGWR DEIR MEETING]00:43:24 MODERATOR
Excuse me, sir. I, I really appreciate your comments and I like hearing some of the history and stuff. We're trying to limit our comments to about three minutes.

[DWP LAGWR DEIR MEETING]00:43:35 BYRON WEINSTEIN
Okay. The, the water that you will be developing out of the treatment plant in the spreading grounds will be a replacement of lost water from Northern California. There will be no growth addition because of that. It's a replacement. And it's a cost saving manner and we don't add any more water to this world than what's there. And this is a use and recycling is the only, uh, situation that will save the world. Is recycled water.

[DWP LAGWR DEIR MEETING]00:44:15 MODERATOR
Thank you sir for your comments. Also, maybe people don't realize but even last year with the drought for six or seven months we didn't bring a drop of water down the aqueducts from the Owens Valley. And, you know, the situation is, is it's a serious situation and recycled water is one of the resources we need to take advantage of. PT-24

[DWP LAGWR DEIR MEETING]00:44:37 JACK HUMPRIVILLE
I'd like, I'm Jack Humpriville, I'm with the DWP Advocacy Committee. Um, what question I have is what are the economics associated with this project? And as part of those economics are these gonna become stranded assets when you start recycling the water from Tillman into, uh, toilet to tap, into directly potable, reusable water?

[DWP LAGWR DEIR MEETING]00:44:59 MODERATOR
Thank you for the comment. And we'll address that. Thank you.

[DWP LAGWR DEIR MEETING]00:45:02 JACK HUMPRIVILLE
When? I haven't seen any, I haven't seen any numbers on these things. We're starting to talk about real money. The numbers from my perspective do not make any sense as witnessed by the Elysian Park project. And by witness by the Griffith Park South water recycling project. They're both, they're both losers. PT-25

[DWP LAGWR DEIR MEETING]00:45:20 MODERATOR
Comment noted.

[DWP LAGWR DEIR MEETING]00:45:22 JACK HUMPRIVILLE
Okay, thank you.

[DWP LAGWR DEIR MEETING]00:45:25 DR. TOM WILLIAMS
Uh, Dr. Tom Williams from Citizens Coalition for a Safe Community. Uh, we'll be submitting lengthy comments. One of the basic issues was discussed, growth inducements. There's another one, environmental justice. We will be exploring both of those two aspects. I hope in the EIR there's no mention of the word, cost, finance or economics because it can be easily searched for. And if you mention it once you gotta assess it. Now, regarding growth inducement, what is the maximum capacity? PT-26 PT-27 PT-28

[DWP LAGWR DEIR MEETING]00:46:06 MODERATOR
I, I'm sorry, Jack's gonna leave and let me just add one little thing to what you just brought up with economics. We're here tonight to go over the SEQUA process and the environmental and economics is not one of, growth inducement and some of these others...

[DWP LAGWR DEIR MEETING]00:46:22 DR. TOM WILLIAMS
I did my first EIR in 1975. And what I heard tonight sounds a little bit like it.

[DWP LAGWR DEIR MEETING]00:46:29 MODERATOR
And, and economics is a factor that our board has to consider when making an informed decision.

PT-29

[DWP LAGWR DEIR MEETING]00:46:35 DR. TOM WILLIAMS
Yeah, I know.

[DWP LAGWR DEIR MEETING]00:46:36 MODERATOR
But, but when you go through the environmental checklist and SEQUA, economics is not one of those things.

[DWP LAGWR DEIR MEETING]00:46:42 DR. TOM WILLIAMS
I really understand.

[DWP LAGWR DEIR MEETING]00:46:43 MODERATOR
Okay, I'll let you continue.

[DWP LAGWR DEIR MEETING]00:46:46 DR. TOM WILLIAMS
For growth inducement, SEQUA requires that you have a plan for the maximum physical capacity of the system. That includes all of the system that provides potable water to the DWP. That would include what is the maximum capacity for the state water project coming from the Delta. The maximum capacity for that coming from the Owens Valley and from the Colorado River. Then you have to assess as to what's the most likely. This will add 30,000 acre-feet times what? Uh, that's roughly 100,000 families. So we're quite concerned regarding the growth inducement and where that growth may be. You guys are worried about the topside. I live downstream of the recharge basins. So I'm concerned about how much of my water will be coming from Tillman rather than the state water project or Owens Valley. So we'll be exploring those aspects. We would also like to ask for a two-week extension. Thank you.

PT-30

PT-31

[DWP LAGWR DEIR MEETING]00:48:08 MODERATOR
Comments noted, thank you.

[DWP LAGWR DEIR MEETING]00:48:10 UNIDENTIFIED MAN
I hope it's a preemptive to the, uh, to the SEQUA process. I, I, I remember seeing one previously but I think one of, I'm hoping in this, in, in this presentation it's going to show what I have read in the old draft EIR about the projected costs of, of increase of water importation from MWB and the other system, uh, as well as to reflect against the concerns of the people of the cost of the building, of building this system. So it's not just about expansion. It's about the importation of water availability. And if you want to see how bad it is, go on the, um, uh, uh, uh, the Federal Geological Survey site or the EPA site and you'll see real-time measurement of how, how low the reservoirs are throughout Southern California. Hydroelectric power has been tremendously reduced because they can't let the water go cause they're trying to hold it for this summer. This is a critical situation. So I hope that covers so, so it'll, you know, show the people to justify that yes, this is going to be an expensive system but it's, but it's gonna be necessary to replace water that may not be there in the next 10 years, uh, of the import water I'm talking about.

PT-32

[DWP LAGWR DEIR MEETING]00:49:41 MODERATOR

Thank you. And again, I mentioned it a few minutes ago, but in our history as far as I know, it was the first time we didn't bring a drop of water down from the Owens Valley for like a seven month period cause there wasn't any. There wasn't enough water to bring down. There's priorities and, uh, anyway. The drought, I don't need to ramble on. (LAUGH) You know, I want to thank you all for your time and input. It really is through the process like this that, uh, we end up with, you know, a project that makes sense and, and works for everybody. And, you know, I've been involved with this process for 20 years, the environmental side of things and getting input from the stakeholders, from the community, the agencies, really, uh, allows us to look at all of the potential impacts and see how we can implement these projects and minimize, uh, impacts to everyone in the community and environment, so thank you. And, okay, well, thank you all.

PT-33

Response PT-1

This portion of the transcript includes the presentation of the Proposed Project given by the moderator of the Draft Environmental Impact Report (EIR) public meeting. No response to these comments is required.

Response PT-2

See Response 4-8 above regarding the capacity of the spreading grounds, the maximum amount of purified water that could be spread at Hansen Spreading Grounds (HSG) and Pacoima Spreading Grounds (PSG), and the annual average amount of purified water that is estimated to be spread at HSG and PSG with implementation of the Proposed Project.

Response PT-3

See Response 12-1 above regarding the various public agencies involved in the approval and/or implementation of the Proposed Project, including the Los Angeles County Department of Public Works. As discussed in Response 12-1 (also see page 1-3 of the Draft EIR), the Los Angeles County Department of Public Works owns and operates HSG and PSG and, therefore, must approve construction at the spreading grounds and the spreading of purified water at the spreading grounds for groundwater replenishment.

Response PT-4

This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. No further response to this comment is required.

Response PT-5

This comment includes introductory remarks and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. No further response to this comment is required.

Response PT-6

This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. No further response to this comment is required.

Response PT-7

See Response 7-4 above regarding remediation projects related to the San Fernando Groundwater Basin.

Response PT-8

See Response 7-5 above regarding the balancing of the mineral content of the purified water produced by the Proposed Project to avoid leaching of contaminants from the aquifer.

Response PT-9

See Response 7-6 above regarding public outreach efforts related to the Proposed Project.

Response PT-10

See Response 5-6 above regarding the issue of a public vote regarding the Proposed Project.

Response PT-11

See Response 5-8 above regarding the growth-inducing impacts of the Proposed Project.

Response PT-12

As described in Chapter 3.7, Greenhouse Gas Emissions and Energy, on page 3.7-13 of the Draft EIR, water conveyance and treatment in California requires substantial amounts of energy. However, as stated on page 3.7-13, the "fundamental purpose of the Proposed Project is to reduce the City's dependence on imported water sources by increasing the local groundwater supply available for potable use. Since the Project would offset imported water supplies of up to 30,000 acre feet per year, the associated electricity consumption would also be offset with Project implementation. The net reduction in electricity consumption would be approximately 42.3 million kWh [kilowatt hours] per year with Project implementation. Therefore, an energy savings would occur and energy consumption associated with operation of the Project would not be expected to be wasteful or inefficient…" As a result of this energy savings, the Draft EIR concludes that impacts related to energy use would be less than significant during operation of the Proposed Project.

Response PT-13

See Response 5-4 above regarding the public review requirements under the California Environmental Quality Act (CEQA) and the public noticing that has occurred throughout the environmental review process for the Proposed Project.

Response PT-14

This comment explains that the Project would offset water that is currently supplied through importation. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. No further response to this comment is required.

Response PT-15

See Response 8-4 above regarding the growth-inducing impacts of the Proposed Project.

Response PT-16

See Chapter 2, Description of the Proposed Project, page 2-9 of the Draft EIR, which describes the existing recycled water pipeline in the Project vicinity. As described on page 2-9, the existing 10-mile-long, 54-inch diameter pipeline, known as the East Valley Recycled Water Line (EVRWL), currently connects the Balboa Pump Station to HSG and the Hansen Storage Tank, located at the LADWP Valley Generating Station (VGS), adjacent to HSG. Although the EVRWL connects to HSG, no recycled water is currently delivered to the spreading grounds itself. As further stated on page 2-16 of the Draft EIR, the existing 10-mile EVRWL that interconnects DCTWRP and HSG has the capacity to transport the required volume of purified water to support groundwater recharge. The EVRWL is currently used to convey recycled water to non-

potable reuse customers, such as golf courses and industrial functions. The existing EVRWL would convey the purified recycled water produced by the Proposed Project to HSG. The EVRWL is not currently used and would not be used after Project implementation to convey potable water, and no water from this existing pipeline would be delivered for direct reuse. All purified water produced by the Proposed Project would be conveyed to the spreading grounds for groundwater recharge only. Thus, no disinfection or flushing of the EVRWL would be necessary for Project operation.

Response PT-17

See Response 7-5 above regarding the balancing of the mineral content of the purified water produced by the Proposed Project to avoid corrosive effects.

Response PT-18

This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. No further response to this comment is required.

Response PT-19

This comment includes introductory remarks and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. No further response to this comment is required.

Response PT-20

See Response 11-1 above regarding public outreach and education efforts related to the Proposed Project.

Response PT-21

See Response 10-1 above regarding the implementation of the Traffic Management Plan that would be prepared for the Project construction along Arleta Avenue and the linear nature of construction activities for the proposed recycled water pipeline, which limits the duration of construction in any one segment of the street.

Response PT-22

See Response 5-3 above regarding the advanced treatment processes proposed for inclusion in the Advanced Water Purification Facilities (AWPF) and the types of constituents removed by each treatment process.

Response PT-23

This comment provides background information on the history of water usage in the City. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. No further response to this comment is required.

Response PT-24

This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. No further response to this comment is required.

Response PT-25

See Response 14-2 above regarding the assessment of economic effects in CEQA environmental documents.

Response PT-26

This comment includes introductory remarks and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. No further response to this comment is required.

Response PT-27

See Response 14-2 above regarding the assessment of economic effects in CEQA environmental documents.

Response PT-28

As discussed on page 2-33 of the Draft EIR, the AWPF would be capable of producing about 35 million gallons per day of purified water. Based on various conditions, including plant maintenance and availability of spreading grounds, this would provide an average production of about 35,000 acre feet per year (AFY), of which 5,000 AFY would be used to meet non-potable reuse demands for recycled water and 30,000 AFY would be used for groundwater replenishment.

Response PT-29

See Response 14-2 regarding the assessment of economic effects in CEQA environmental documents.

Response PT-30

See Response 14-9 above regarding the growth-inducing impacts of the Project.

Response PT-31

See Response 9-1 above regarding the public review period for the Draft EIR.

Response PT-32

This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. No further response to this comment is required.

Response PT-33

This portion of the transcript includes closing remarks provided by the moderator concluding the Draft EIR public meeting. It does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft EIR. No further response to this comment is required.

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