

APPENDIX H

**COMMENT LETTERS ON DRAFT ENVIRONMENTAL IMPACT REPORT
AND RESPONSES TO COMMENTS**

STATE CAPITOL
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 SUITE 205
 WOODLAND HILLS, CA 91367-2108
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**Assembly
 California Legislature**

FRAN PAVLEY
 ASSEMBLY MEMBER, FORTY-FIRST DISTRICT

CHAIR, BUDGET SUBCOMMITTEE
 ON RESOURCES (NO. 3)
 COMMITTEE MEMBER:
 BUDGET
 EDUCATION
 LOCAL GOVERNMENT
 NATURAL RESOURCES
 WATER, PARKS AND WILDLIFE

RECEIVED

May 11, 2001

MAY 11 2001

CES

Kelvin Lew
 CITY OF LOS ANGELES
 Department of Water and Power
 111 N. Hope Street, Room 1044
 Los Angeles, CA 90012

Re: Draft Environmental Impact Report
 Mulholland Water Pipeline Project

Dear Mr. Lew:

PAV-1

The proposed Mulholland Water Pipeline project is located in the 41st Assembly District. I would respectfully request a copy of the Draft EIR so that I can comment in a timely manner. If there are technical supplements or addenda, I do not need copies of those. Thank you very much for your courtesy.

Sincerely,



Fran Pavley,
 Assemblymember, 41st AD

LCR:ms

Handwritten notes:
 5/11/01
 Left message
 did answer mail
 with letter
 5/11/01

PAV – 1:

Commentor was informed 5/14/01 that the Draft EIR was available on the LADWP website at www.ladwp.com/water/projects. No response necessary.

STATE OF CALIFORNIA—THE RESOURCES AGENCY

GRAY DAVIS, Governor

SANTA MONICA MOUNTAINS CONSERVANCY

SOOKY GOLDMAN NATURE CENTER
2800 FRANKLIN CANYON DRIVE
BEVERLY HILLS, CALIFORNIA 90210
PHONE (310) 858-7272
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Post-It® Fax Note	7671	Date	5/24	# of pages	2
To	Charles Smith / Christine L.	From	Kelvin Law		
Co./Dept.	URS	Co.	LADWP		
Phone #		Phone #	213-367-0202		
Fax #	714-667-7147	Fax #	713-367-3582		

May 14, 2001

Mr. Kelvin Law
Environmental Assessment
City of Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, California 90012

**Mulholland Water Pipeline Project
Draft Environmental Impact Report Comments**

Dear Mr. Law:

The Sante Monica Mountains Conservancy (Conservancy) approves of the Department of Water and Power's (DWP) decision to circulate a draft Environmental Impact Report (DEIR) for this project. However, we have found that the DEIR fails to satisfactorily address our concerns and thus, we are still unable to support this project.

SMM C-1

The DEIR does not significantly clarify the need for the project, only increasing the number of complaints regarding low or no water pressure from 32 to 111. The reduction in complaints and possible use during emergencies seem to be the only tangible results of the project, and they hardly seem to justify a public works project of this magnitude.

SMM C-2

The only other two benefits mentioned, increased fire protection and provision of water service to approved development projects within the service area, are contingent upon future projects, not this one. Fire protection will not be increased until a project is implemented to install fire hydrants along Mulholland Drive, and increased water provision will only be needed if and when the development projects move forward.

SMM C-3

Furthermore, the DEIR fails to address the Conservancy's concern that this project may just be one in a series of possible water system improvement projects in the area. As we stated in our comment letter for the draft Negative Declaration, the 1997 Mulholland Pipeline

Mr. Kelvin Law
Department of Water and Power
Mulholland Water Pipeline Project
May 14, 2001

Page 2

SMM C-3

Report identified other needed improvements. If these improvements are still needed, they should have been addressed as 'reasonably foreseeable projects' in the Cumulative Impacts section of the DEIR, if this project fulfills or negates the need for those improvements, that too should be stated.

We are glad to see that an alternatives analysis was done, but are disappointed that our suggested alternative was not included.

Finally, the Conservancy disagrees with the assessment that there are no growth-inducing impacts from this project. While not the only barrier to development along the scenic corridor, lack of water is a major one. The placement of a water line along Mulholland Drive is obviously a significant project, as evidenced by this process. By placing a pipeline along Mulholland Drive, the DWP will be removing a large economic barrier to any future development plans, and will be providing a direct economic benefit to the Mulholland Hills Associates and Woodland Hills Estates projects. Not only should this be considered a growth-inducing impact, but may also be considered a gift of public funds. While you state that such economic impacts are outside the scope of this DEIR, they do provide additional reasons why we cannot support this project.

As stated in our comment letter of July 26, 2000, the Conservancy opposes any unnecessary infrastructure within and through, Mulholland Gateway Park and any projects that would induce growth that is detrimental to existing public resources. This DEIR does not adequately justify the need for this project, nor does it address all of the concerns stated in our previous comment letter. We expect that these problems will be addressed in the Final Environmental Impact Report.

Please contact Paul Edelman of our Staff at (310) 589-3200 ext. 128 with any questions.

Sincerely,



MICHAEL BERGER
Chairperson

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SMMC – 1:

As indicated in Section 1.3 of the EIR, the proposed project is needed to: 1) improve water system pressure and water service reliability; 2) provide emergency supply to the Kittridge Tanks service zone; and 3) provide for improved flows to existing fire hydrants in the Topanga Tank service zones; and 4) ensure that the demands for water service as a result of planned and approved development (e.g., 21000 Mulholland) are met.

SMMC – 2:

See Response to SMMC-1. As stated in Section 1.1, the project has been proposed to “improve overall water system reliability for current users and to provide for approved development in the project vicinity, as well as to provide an additional source of water for fire protection in surrounding communities from potential brushfires, and other emergencies.” Fire protection in the immediate vicinity of the project area, particularly in the Topanga Tank service zone, would be improved through increased system pressures at existing fire hydrants.

SMMC – 3:

There are no other water system improvements that are planned or foreseeable in the near future in the proposed project area.

Mr. Kelvin Law
Department of Water and Power
Mulholland Water Pipeline Project
May 14, 2001

Page 2

Report identified other needed improvements. If these improvements are still needed, they should have been addressed as 'reasonably foreseeable projects' in the Cumulative Impacts section of the DEIR, if this project fulfills or negates the need for those improvements, that too should be stated.

SMM C-4

We are glad to see that an alternatives analysis was done, but are disappointed that our suggested alternative was not included.


SMM C-5

Finally, the Conservancy disagrees with the assessment that there are no growth-inducing impacts from this project. While not the only barrier to development along the scenic corridor, lack of water is a major one. The placement of a water line along Mulholland Drive is obviously a significant project, as evidenced by this process. By placing a pipeline along Mulholland Drive, the DWP will be removing a large economic barrier to any future development plans, and will be providing a direct economic benefit to the Mulholland Hills Associates and Woodland Hills Estates projects. Not only should this be considered a growth-inducing impact, but may also be considered a gift of public funds. While you state that such economic impacts are outside the scope of this DEIR, they do provide additional reasons why we cannot support this project.

As stated in our comment letter of July 26, 2000, the Conservancy opposes any unnecessary infrastructure within and through, Mulholland Gateway Park and any projects that would induce growth that is detrimental to existing public resources. This DEIR does not adequately justify the need for this project, nor does it address all of the concerns stated in our previous comment letter. We expect that these problems will be addressed in the Final Environmental Impact Report.

Please contact Paul Edelman of our Staff at (310) 589-3200 ext. 128 with any questions.

Sincerely,



MICHAEL BERGER
Chairperson

SMMC – 4:

The comment refers to an alternative identified in a comment on the Proposed Negative Declaration/Initial Study dated June 26, 2000. The comment proposes the acquisition of Tract 33454 and the construction of a water tank in the 'bowl' of this parcel. Tract 33454 is an approved development. Acquisition of a parcel already approved for development by the Department is considered to be infeasible. In addition, construction of a water tank at an elevation of 1,260 feet would be incapable of providing water to surrounding water system users, which are located at a higher elevation. Consequently, this alternative was considered to be infeasible and not addressed in the EIR.

SMMC – 5:

As discussed in Section 4.3, the installation of a new water source "would potentially attract new development to the project area" and thus have the potential to induce growth in the area. The proposed project would potentially allow for greater ease of connection, thereby potentially inducing development in the area. However, as also indicated in Section 4.3, the absence of other infrastructure-related facilities, collectively, are even a greater barrier to development in the area. Therefore, the degree to which the pipeline would influence the rate, location and amount of growth is not considered significant.

The remainder of the comment is of a subjective nature and refers to the economics of the proposed project. Pursuant to CEQA, economic concerns are beyond the scope of this document. The comment is noted and will be forwarded to the appropriate decision-makers for consideration.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

GRAY DAVIS, Governor

DEPARTMENT OF TRANSPORTATION
OFFICE OF REGIONAL PLANNING
DISTRICT 7, IGR/CEQA 1-10C
120 SO. SPRING ST.
LOS ANGELES, CA 90012
TEL: (213) 897-6696 ATSS: 8-647-6696
FAX: (213) 897-6317

May 22, 2001



IGR/CEQA cs/010565
DEIR
City of Los Angeles
Mulholland Water Pipeline
Vic. LA-101-24.74
SCH # 2000061066

RECEIVED
JUN 05 2001
CES

Mr. Kelvin Lew
City of Los Angeles
Department of Water and Power
111 N. Hope St., Room 1044
Los Angeles, CA 90012

Dear Mr. Lew:

Thank you for including Caltrans in the environmental review process for the above-mentioned project. Based on the information received, we have the following comments:

CT-1

As mentioned in our previous comments, we recommend that truck trips be limited to off-peak commute periods along congested freeway corridors. Also, transport of oversize or overweight vehicles on State highways will need a Caltrans Transportation Permit.

If you have any questions regarding our response, refer to Caltrans IGR/CEQA Record # cs/010565, and please do not hesitate to contact me at (213) 897-4429.

Sincerely,

STEPHEN BUSWELL
IGR/CEQA Program Manager

cc: Mr. Scott Morgan, State Clearinghouse

CT-1:

Comment acknowledged. As indicated in Section 5.0, TRANS-1: Truck trips would be limited to off-peak commute periods along congested freeway corridors (Topanga Canyon Boulevard and US-101). In addition, construction contractors would be required to obtain Caltrans Transportation Permits for the transport of oversize/overweight vehicles on State highways.



CINDY MISK

City of Los

Councilwoman, Eleventh District

Post-It® Fax Note	7671	Date	6/11	# of pages	3/5
To:	Charles Smith / CUNNINGHAM L-H	From:	Kevin		
Co./Dept:	VRS	Co.:	LADWP		
Phone #:		Phone #:	213-367-0642		
Fax #:	714-667-7447	Fax #:	213-367-3582		

Mr. Kelvin Lew
 City of Los Angeles
 Department of Water and Power
 111 N. Hope Street, Room 1044
 Los Angeles, CA 90012

June 8, 2001

RECEIVED
 JUN 12 2001
 CES

Dear Mr. Lew:

MIS-1

I am writing to you to comment on the Focused Environmental Impact Report released for the Mulholland Water Pipeline Project. I appreciate your Department taking the time to address my concerns regarding the aspect of increased growth, however, I am still not completely satisfied with the Department's analysis as presented. Recently my office has entered into negotiations with the Santa Monica Mountains Conservancy to purchase two properties threatened by development in this area, Avatar and 21000 Mulholland. The Conservancy in conjunction with the State and my office are working diligently to see that these properties are maintained as open space. If that occurs no new development will be planned for the area at this time. I would like an evaluation of this pipeline in a scenario of zero growth. Would the need for redundancy and brush protection still require the construction of this proposed pipeline?

MIS-2

Another concern I would like the Department to address is the cited 111 complaints that were received between 1992 and 1999 regarding a lack of service or low water pressure. The number appears significant if one assumes that all of the complaints were received from different addresses, however, that is not made clear. Please specify the locations and types of complaints that were received. If the complaints are all being generated from one location or relatively few sites it may be possible that there is another solution to the current pipeline that should be addressed rather than constructing an entirely new water line.

I would appreciate the Department further addressing these concerns in the Final Environmental Impact Report.

Very truly yours,

Cindy Misk

Valley Office
 17547 Ventura Boulevard, Room 202
 Encino, CA 91316
 (818) 756-8150
 (818) 756-9175 Fax

City Hall
 200 N. Main Street, Room 407
 Los Angeles, CA 90012
 (213) 485-3811
 (213) 473-6926 Fax

West Los Angeles Office
 1645 Corinth Avenue, Room 201
 Los Angeles, CA 90025
 (310) 575-8461
 (310) 575-8305 Fax



MIS – 1:

Comment noted. As indicated in Section 4.3.2, “the SMMC intends to acquire approximately 876 acres of private land comprising six acquisition projects, as listed in Table 2.2.” Included in this listing are the Avatar and 21000 Mulholland properties. As also described in Section 4.3.2, due to the lack of other available infrastructure, in addition to active and ongoing land acquisition efforts of the SMMC and the American Land Conservancy, the proposed project would have a negligible impact on the amount of growth anticipated in the project vicinity.

As indicated in Sections 1.1 and 1.3, the project has been proposed by the LADWP to improve overall water system reliability for current users and to provide for approved development in the project vicinity, as well as to provide an additional source of water for fire protection and other emergencies. In the scenario of zero growth (i.e., acquisition of Avatar and 21000 Mulholland by the SMMC), the following conditions would still exist: 1) low system pressures to residents and existing fire hydrants (i.e., low fire protection) in the Topanga Tank service area; and 2) lack of a secondary source of water to the Topanga Tank or the southern Kittridge Tanks service area in the event that the Granada Trunk line fails (i.e., no redundancy feature).

In essence, in the zero growth scenario, the proposed project would still be necessary to improve overall water system reliability for current users and to provide an additional source of water for fire protection and other emergencies.

An analysis of the existing project need (i.e., zero growth) for the proposed project is further detailed in the following response to MIS-2.

MIS – 2:

The number of complaints estimated in the Draft EIR was determined from LADWP Water Trouble System records provided for the period 1992-1999. Records revealed the origin (i.e., address), type of complaint (i.e., leaks, flooding, broken valves, mains and meters, low pressure, and no water) and date/time call was placed. A total of 1,402 complaints were counted irrespective of the source, frequency, time, or type of complaint. The total includes multiple calls from the same residents for the same complaint on different occasions, cancelled service orders, and multiple calls from different residents on the same street and for the same problem. In determining the number of complaints driving the purpose and need for the proposed project, the Draft EIR identified a total of 111 ‘no water’ and ‘low pressure’ complaints which included some redundant calls (i.e., multiple calls within the same month for the same problem). Upon reviewing the records in greater detail, 24 additional redundant ‘no water’/‘low pressure’ complaints were counted bringing the total to 135. Nine of the streets included in the records search were outside the 1337, 1677 and 1305 service zones and thus eliminated bringing the revised total to 120.

In further defining ‘no water’/‘low pressure’ complaints, those calls that were placed within the same month in the same year from multiple residents living on the same street were counted as one complaint so as to avoid redundancy. The revised total is 86 (see Section 1.3).

The attached Table 1 depicts the origin of the complaints by street name for each year between 1992 and 1999 and the totals used for the Draft EIR. Two additional columns have been added to identify the combined service complaints and the redundant calls. The table shows that most of the complaints occurred in 1994 from 19 different streets within the 1337, 1677, and 1305 service zones. In general, the number of complaints have been consistent throughout the period averaging 11 complaints per year.

These customer complaints were intended to provide an easy-to-understand illustration of the pressure problems experienced in the proposed project's service area. In addition, LADWP gathered field data during August and September 2000 in an effort to confirm the presence of low pressure in the service area. Based on the field data taken at three discrete hydrant locations, water system pressures in portions of the 1337 service zone did not meet current LAFD requirements for proper operation of fire hydrants. In addition, follow-up readings were taken at these hydrants during July and August 2001. Follow-up findings are consistent with previous readings. Although not included as part of the Draft EIR, these readings (August and September 2000 and July and August 2001) have been included in Appendix I of this Final EIR. In that it is the responsibility of LADWP to address this deficiency and improve water service reliability to its customers, the Mulholland Water Pipeline Project has been proposed.

**TABLE 1
NUMBER OF COMPLAINTS
LADWP WATER TROUBLE SYSTEM RECORDS, 1992-1999**

STREET	1992	1993	1994	1995	1996	1997	1998	1999	Draft Total	Combined Complaints	Total Complaints
Alhama Drive	1	2	3	3	0	1	0	0	10	10	17
Azuena Drive	2	0	0	1	2	1	0	0	6	6	6
Castillo Street	2	0	2	0	0	0	0	0	4	4	7
*Carrol Avenue	1	0	0	0	0	0	0	0	1	1	1
*Cardamine Court	0	0	0	0	1	0	0	0	1	1	1
Cezanne Avenue	0	0	2	1	0	0	2	1	6	6	11
Cezanne Place	0	0	1	0	0	0	0	0	1	1	1
Dumetz Road	0	0	0	2	0	0	0	0	2	2	2
Empis Street	0	0	0	0	1	0	0	0	1	1	1
*Emporia Avenue	0	0	0	1	0	0	0	0	1	1	2
Empress Avenue	0	0	0	1	0	0	0	0	1	1	1
Escondido Street	1	1	1	0	0	0	0	0	3	3	3
*Esmeralda Street	0	1	0	0	0	0	0	0	1	1	1
Excelente Drive	0	2	1	1	2	0	0	0	6	6	12
Golondrina Street	2	0	0	0	0	1	0	0	3	3	3
*Gonzaga Avenue	0	0	2	0	0	0	0	0	2	2	2
Lobos Road	0	0	2	0	0	3	0	0	5	3	5
Marcos Road	0	0	1	0	0	0	0	0	1	1	1
*Marcus Avenue	0	0	0	4	0	0	0	0	4	3	4
Matisse Avenue	0	0	1	0	0	0	0	0	1	1	1
*Matteson Avenue	0	0	0	0	0	0	1	0	1	1	1
Michalangelo	0	1	1	0	0	0	0	0	2	2	2
Monet Avenue	0	0	1	0	0	0	0	0	1	1	1
Monette Place	0	0	0	0	0	0	1	0	1	1	1
Morro Drive	1	0	3	1	2	0	0	2	9	9	9
Picasso Place	0	0	1	0	1	1	0	0	3	3	3
Quinta Road	0	2	0	1	1	0	0	0	4	4	4
Reforma Road	0	1	1	0	0	0	0	0	2	2	2
*Regalo Road	1	0	2	0	1	0	0	0	4	3	4
Regency Way	0	0	1	0	0	0	0	0	1	1	1
Rosario Road	0	2	3	0	0	1	0	0	6	3	6
Satillo Street	0	1	6	1	0	0	0	0	8	3	8
*Terecita Place	0	0	0	0	1	0	0	1	2	2	2
Tosca Road	1	0	0	0	0	2	0	1	4	4	4
Trinidad Road	1	1	0	0	0	0	0	1	3	3	5

**TABLE 1
NUMBER OF COMPLAINTS
LADWP WATER TROUBLE SYSTEM RECORDS, 1992-1999**

STREET	1992	1993	1994	1995	1996	1997	1998	1999	Draft Total	Combined Complaints	Total Complaints
TOTAL	13	14	35	17	12	10	4	6	111	99	135
TOTAL EXCLUDING STREETS OUTSIDE THE 1337, 1677, AND 1305 SERVICE ZONES									97	86	120

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Post-It Fax Note	7671	Date	6/11	# of pages	31
To	Charles Smith / California L-H	From	Kevin		
Co./Dept.	JRS	Co.	LADWP		
Phone #		Phone #	213-367-0242		
Fax #	714-467-7147	Fax #	213-367-3582		

6 WH

001

Laurane Leah Ruth
P.O. Box 8214
Calabasas, CA 91372

June 8, 2001

Mr. Kelvin Lew
City of Los Angeles
Department of Water and Power
111N. Hope Street, Room 1044
Los Angeles, CA 90012

RE: MULHOLLAND WATER PIPELINE PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Mr. Lew,

Look at Figure 2 - A map of "Existing and Proposed Project Components."

To say the Proposed Pipeline will not induce growth is ridiculous. Almost everywhere where there are Existing Lines - residential properties peek the map.

Look at Figure 2 - A map of "Existing and Proposed Project Components."

Where the Proposed Line is indicated - open space now breathes. This is habitat and home to bobcats, coyotes, snakes, and squirrels - birds and trees - grasses and stones. Free mountain communities of Natural Life pulse in heartbeats - that count - a lot.

It is an insult to intelligence and sensibilities to pretend this Proposed Project would not soon erupt to seize and squeeze this oasis of nature.

Bang! Bang! Build! Build! Money! Money!

RUTH-1

It is selfishness towards the innocent who shares itself in balance -- in its rough form of skies, waters, watersheds, and land -- plants, animals, and the animal man. For indeed, the man animal also has a right to places of freedom in concert with our brothers and sisters of -- chirping and howling, prowling and hopping, shaking and slithering, and meowing wild among leaves that speak with winds -- and flowers who sing Life.

And we each dance in our own unique ways (in mutual respect and regard) among the vegetation and natural terrain of this gift --

Works of Nature's Living Art.

Composition's from another place - both of compassion, caring, and love --

Don't relegate it to a photograph in a museum somewhere - of what was once the Dirt Mulholland Sanctuary. Don't relegate it to a hanging on a wall - an 8 by 10 glossy print of silence and stillness

as the mourners file past.

No pipeline here! Period.

Sincerely,
Laurane Leah Ruth
Laurane Leah Ruth

RUTH – 1:

Comment noted. As indicated in Section 4.3, the proposed project has the potential to attract development to the area mainly due to the ease of connection to an existing infrastructure. However, when considering the collective absence of other major barriers to development in the area and on-going efforts by the Santa Monica Mountains Conservancy to purchase property targeted for development, the impact is not considered significant and the undeveloped land would likely remain in its current condition. If successful, the Conservancy would likely prohibit any commercial or housing development in the area.



Protecting The Integrity Of C

WHHO
WOODLAND HILLS I
P.O. Box 6368, Woodland Hills,

Post-it® Fax Note	7671	Date	6/11	# of pages	325
To:	Charles Smith/Christina L-H	From:	Kevin		
Co./Dept:	JRS	Co.:	LADWP		
Phone #		Phone #	213-367-0242		
Fax #	714-667-7447	Fax #	213-367-3582		

June 10, 2001

RECEIVED

JUN 11 2001

CES

Mr. Kelvin Lew
City of Los Angeles
Department of Water and Power
111 N. Hope Street, Room 1044
Los Angeles, CA 90012

Re: Mulholland Water Pipeline Project

Draft
Environmental Impact Report

Project No. 57-00170019.02

Dear Mr. Lew:

This is in response to the Draft EIR for the proposed Mulholland Pipeline Project. Our comments cover the entire EIR and comments made throughout the time table of this proposal.

1.1 Overview

This fails to point out that this proposal was withdrawn in a letter dated May 17, 1998 by General Manager Davis S. Freeman clearly stating that this was a low priority. Yet now, "under summary of comments received," the statement that "LADWP now considers the proposed project a priority due to availability of resources."

WHHO-1

ie: this means that it is a priority to expend funds. This actually renders false the statements made for the need for this project.

1. "for the good of the public to insure water" is false since it has not and is not considered a high priority for adequately supplying water to an area of the City of Los Angeles.
2. That suggesting it will improve fire protection and then assert that none is contemplated unless requested by the Fire Dept. is false since no monies are reserved to fill that proposal.

A California Nonprofit Corporation
4128 Morro Drive, Woodland Hills, California 91364
(818) 345-5842 e-mail g.murley@worldnet.att.net

WHHO – 1:

The comment references a letter dated May 17, 1998, at a time when the LADWP was evaluating the impacts of power deregulation and the USEPA's Surface Water Treatment Rule. These two items required immediate attention in order assure the LADWP's ability to provide adequate and reliable service to its customers. In order to comply with the Surface Water Treatment Rule, resources were being focussed on increased covered water storage and improved filtration systems. Now that these improvements to the water system are under way, the emphasis has moved towards water conveyance.

The comment is correct in that no fire hydrants are proposed as part of the proposed project. However, the proposed project would improve fire protection to the existing fire protection system by improving system pressures to these hydrants.

1.2 Project Background

WHHO-2

This fails to mention that the Subdivision Tract 33454 in its own EIR stated that it would get water from the County water district, then offered \$500,000 to LADWP bring water down to them from the Corbin Tank. Now LADWP tries to assert that all ratepayers must subsidize a development because they feel they have money to burn for a project that in 1998 was considered very low priority.

1.3 Purpose and Need

WHHO-3

It states that there were 31 complaints alluding to 31 different residences. No documentation has been given in the DEIR or the Draft as to the area of these complaints or what exactly was the complaints and the time of day. Now we have in this document 111 complaints. No where is there documentation as to the cause of the complaint, days and times of complaints, how long they were without water, and was the Department aware that there would be an outage due to construction work or accidents or broken water mains. To allude that this is due to lack of a line from Corbin Tank is an insult to the public.

1.4 Relevant Plan and Projects

WHHO-4

- Mulholland Scenic Parkway Specific Plan (1985)

To suggest that the right is there is a gross misstatement because it clearly states that only if feasible alternatives do not exist. In this EIR there are clearly feasible alternatives. The most feasible is "NO PROJECT".

WHHO-5

- Vesting Tentative Tract No. 33454 Draft Environmental Database (1992)

This EIR claimed that it would get its water from L.A. County water district, and got a subdivision based on that assumption and denied at hearings that there was a problem with adequate water. As to inadequate fire facilities, the area has had the same facilities for over 40 years and despite growth neither LAFD or LADWP ever seemed concerned and yet now 25 homes makes it imperative. There have been over 25 homes built since 1998 and yet no mention of fire problems have been mentioned except for this one subdivision.

2.1 Project Description

WHHO-6

The project description states that there would be only 150 gpm for the proposed tract and it appears that the current customers will receive approximately the same as they do now.

WHHO – 2:

The comment refers to the project funding and does not pertain to potential environmental impacts that may be associated with the proposed project. The comment is noted and will be forwarded to the appropriate decision-makers for consideration.

WHHO – 3:

Comment noted. See response to MIS-2.

WHHO – 4:

Pursuant to Section 15126.6 of the CEQA Guidelines, a Draft EIR provides a description of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” The EIR need not identify the “most feasible” alternative, but only compare their respective environmental impacts.

Alternative 2 is feasible under the Mulholland Scenic Parkway Specific Plan (1985) in that it is the one alternative with the majority of the alignment outside the Outer Corridor, thereby, avoiding impacts to the dirt portion of Mulholland Drive while maintaining the integrity of the roadway.

WHHO – 5:

The construction of new homes in any area increases the potential for human induced structural fires, as well as, wildland fires from careless users and visitors to the adjacent open space. The proposed project would serve to improve the existing fire fighting capabilities in the area in the event of such a fire. The project would not solely benefit the approved Tract No. 33454 development. Rather, the proposed project would also serve the emergency needs of the Kittridge Tanks service zones as well as provide improved fire protection services to existing residents.

See also response to MIS-2.

WHHO-6:

The 150 gpm referenced in the comment refers to a volume of usage rate estimated for Tract 33454. It does not refer to water pressure. Tract 33454 consists of the construction of approximately 25 homes. A flow of five gpm per home was utilized for design purposes, whereas the total development may receive up to 150 gpm. Existing service area customers and users would receive up to 1,050 gpm.

WHHO-7

It is also stated they have not figured out where the maintenance holes would be located and the statement that the design and location of these appurtenant structures for the proposed project would consider such factors as topography, geology, traffic, accessibility, drainage, and best engineering practices, does not speak well of this EIR since it brings up significant problems without any mitigations.

WHHO-8

This proposed project will alter the current road bed which is already extremely fragile. One cannot make an egg whole once it is broken and the same is true of a roadbed. We have seen significant erosion since UNOCAL repaired and slurried their pipeline some five or more years ago. This is just not acceptable given the fact there is no need for this project.

2.1.3 Existing and Supporting Facilities

WHHO-9

It is interesting that a 6" line connects the current 12" & 16" lines from the Topanga Tank. Then the statement "user have experienced low water pressure due t increases in water system demand" as a basis of justification. Interesting that in 10 years there have been only 31 or perhaps 111 complaints which works out between 3.1 and 11.1 per year or less than one per month at the high end and one every 4 months on the low end. Where is the documentation that would support even this low level of complaint for this project.

2.2 Project Alternatives

2.2.1 Alternative 1 – Mulholland Gateway Park

WHHO-10

This alternative is as objectionable as the proposed project. It will cut through known landslide areas, impact mountain lion, bobcat, deer, coyote, red tail hawk, cooper hawk, quail and dove habitat. This disturbance is unsatisfactory given the greatly reduce animal habitat. Since the Avitar project will not be built, the assumption as to where it will be placed is erroneous. It still tears up the fragile road bed of Mulholland.

There is no practical rational for fire hydrants along dirt Mulholland since they would be useless in a wildfire. They are fixed and will attract vandals and the few that are along Mulholland have not served the public at all in prior fires.

2.2.2 Alternative 2 – Ellenita/Wells/Canoga Alignment

WHHO-11

This alternative is the least destructive to the environment but still is waste of monies and not in the public's interest since it is driven only by the proposed development at 21000 Mulholland (TRACT 33454).

WHHO-11

There is no practical rationale for fire hydrants along dirt Mulholland since they would be useless in a wildfire. They are fixed and will attract vandals and the few that are along Mulholland have not served the public at all in prior fires. So this is a specious argument against this alternative.

2.2.3 Alternative 3 -- Topanga Tank Expansion

This alternative would require grading on an unstable hillside and the required buildings would make this unsafe and certainly unsightly. The fact that a new pumping station would be required if the figures are correct makes one wonder if that alone would solve the so called 31 complaints. What has not been mentioned is that currently it appears that the Topanga Tank is not kept full for proper pressure around the clock, therefore if it were there appears that no complaints of low pressure would occur once every 4 months.

There is no practical rationale for fire hydrants along dirt Mulholland since they would be useless in a wildfire. They are fixed and will attract vandals and the few that are along Mulholland have not served the public at all in prior fires. So this is a specious argument against this alternative.

2.2.4 No Project Alternative

This is the superior alternative for this proposed project because LADWP has not shown any criteria that makes its case for the good of the current residents of Woodland Hills or the City of Los Angeles. This is a gift of money for a development that in its own testimony before the Deputy Advisory Agency stated that it did not have to bring the water down from the Corbin Tank to satisfy its needs for water.

2.3 Cumulative Development

The list of cumulative development shows how poorly this EIR has been developed. There are a number of projects listed that show "approved" that are completed. With the exception of 5 small projects none of the others is impacted or impact the proposed project.

3.0 Effects Found Not To Be Significant

3.7 Land Use and Planning

This proposed project is growth inducing because LADWP does in fact sell water to other agencies. This has the potential to increase heavily the construction of homes in the watershed of the Los Angeles River. Since the Los Angeles River is already over burdened and the Army

WHHO-7:

The precise location of maintenance covers for the pipeline would be determined when engineering design is completed and would be based on geotechnical investigations for the proper placement of such covers so as to minimize slope instability. Design would consider topography, drainage, accessibility, and other issues as appropriate. The EIR discusses the potential impacts and applicable mitigation measures associated with the presence of these covers. (See Section 4.2.4).

WHHO – 8:

The comment refers to the erodibility of the unpaved roadway during construction and operation of the project. Any excavation and/or trenching that is to occur would be backfilled with native materials, to the existing surface grade and would have essentially the same resistance to erosion as the native material. The proposed pipeline would not alter the existing grades or drainage patterns. The proposed project would occur within the existing roadway, and would not involve widening, recontouring, realigning, or altering the roadway.

During operation, the roadway's condition and use are expected to continue as is upon implementation of the proposed project, thus, having no influence on erosion potential.

WHHO – 9:

The existing 6-inch line referenced in the comment is an inlet/outlet line that is connected to the 12 to 16-inch line. It does not connect the 12-inch and 16-inch lines together and does little to improve system pressures in the 12 to 16-inch line. The constriction is the 12-inch line, which the proposed project would increase to a 16-inch line.

As stated in Section 1.3, "The LADWP has received several documented pressure complaints from water service users in the southwestern San Fernando Valley since the early 1990s." This documentation is in the form of LADWP Water Trouble System records between 1992 and 1999. See also response to MIS-2.

WHHO – 10:

Comment noted. As stated in Section 2.2.1, Alternative 1 would involve excavation in previously undisturbed terrain and follow a new roadway proposed as part of the approved Mulholland Hills Estates project (Tract 50784). Although the SMMC has entered into negotiations with the property owner to purchase the land, final transactions have not been made (i.e., close of escrow) at the time the Draft EIR was written, so this alternative is still considered feasible. Consequently, this alternative is not the preferred alternative.

As stated in Section 1.3, fire hydrants along 'Dirt' Mulholland Drive are not being proposed as part of this project. The ability for the Los Angeles Fire Department to install these hydrants is considered a secondary benefit to the proposed project, providing immediate access to the remote open space in the event of a wildland fire. The direct benefits to fire protection would be the increase in system pressures to existing fire hydrants in already developed areas. Fire protection is within the purview and mission of the Los Angeles Fire Department and the decision to put in hydrants would be at their discretion.

WHHO – 11:

Construction of Alternative 2 would result in similar environmental impacts as the proposed project, but would differ in its level of impact on biological resources, noise, public services, transportation and

utilities and service systems. While this alternative may have fewer negative impacts to natural resources than the proposed project, it is anticipated to have greater impacts than the proposed project to noise, public services, transportation, and utilities and service systems.

Construction of Alternative 2 would likely result in increased noise levels and groundborne vibration given the proximity of homes along the entire length of the alignment. Most homes are within 20-30 feet of the edge of the road. Due to the highly developed nature of the area, relocation and temporary disruptions to existing utility systems (e.g., sewer, stormdrain, water, gas, etc.) anticipated. In addition, Alternative 2 would result in greater construction traffic impacts than the proposed project, in that construction would take place along existing roadways traveled primarily by surrounding area residents. Construction of this alternative would not necessarily add more vehicles to the road or substantially increase traffic congestion, but would delay and interrupt normal traffic flows by temporarily closing lanes within the construction zone. It is assumed that through-traffic would be maintained. Operation of Alternative 2 would have no significant impact on transportation or traffic. Alternative 2 would also generate substantially more waste and debris from pavement breaking activities than the proposed project. Despite adequate capacity of local landfills to accommodate the waste, this alternative places a greater burden on utility services than the proposed project.

See response to WHHO-10 regarding fire hydrant-related issues.

There is no practical rational for fire hydrants along dirt Mulholland since they would be useless in a wildfire. They are fixed and will attract vandals and the few that are along Mulholland have not served the public at all in prior fires. So this is a specious argument against this alternative.

2.2.3 Alternative 3 – Topanga Tank Expansion

WHHO-12

This alternative would require grading on an unstable hillside and the required buildings would make this unsafe and certainly unsightly. The fact that a new pumping station would be required if the figures are correct makes one wonder if that alone would solve the so called 31 complaints. What has not been mentioned is that currently it appears that the Topanga Tank is not kept full for proper pressure around the clock, therefore if it were there appears that no complaints of low pressure would occur once every 4 months.

There is no practical rational for fire hydrants along dirt Mulholland since they would be useless in a wildfire. They are fixed and will attract vandals and the few that are along Mulholland have not served the public at all in prior fires. So this is a specious argument against this alternative.

2.2.4 No Project Alternative

WHHO-13

This is the superior alternative for this proposed project because LADWP has not shown any criteria that makes its case for the good of the current residents of Woodland Hills or the City of Los Angeles. This is a gift of money for a development that in its own testimony before the Deputy Advisory Agency stated that it did not have to bring the water down from the Corbin Tank to satisfy its needs for water.

2.3 Cumulative Development

WHHO-14

The list of cumulative development shows how poorly this EIR has been developed. There are a number of projects listed that show "approved" that are completed. With the exception of 5 small projects none of the others is impacted or impact the proposed project.

3.0 Effects Found Not To Be Significant

3.7 Land Use and Planning

WHHO-15

This proposed project is growth inducing because LADWP does in fact sell water to other agencies. This has the potential to increase heavily the construction of homes in the watershed of the Los Angeles River. Since the Los Angeles River is already over burdened and the Army

WHHO-15

Corp of Engineers has publicly stated that in a 50 to 100 year storm they can expect flooding from Sherman Oaks to Long Beach.

The fact that the proposed project would increase the water storage capacity at the Kittridge site would encourage greater development and destruction of the watershed at the head of Los Angeles River and thus increase the likelihood of yearly flooding from Sherman Oaks to Long Beach.

3.11 Recreation

To try and justify the project by installing drinking fountains on Mulholland is absurd. There are few on the paved portion and they have been installed by the Santa Monica Mountains Conservancy and not maintained by LADWP or Recreation and Parks.

4.0 Proposed Project and Alternative Analysis

The proposed project will be the most devastating of all the proposals because the animals use both sides of Mulholland and breed where there is close proximity of water and there are numerous springs that are close to the roadway. It will impact more plant species and reptile species than any other proposal. This EIR is so deficient this section alone renders it incomplete and unacceptable as a document.

4.1 Biological Resources

The fact that there was a survey covering just one day February 22, 2001 is a violation of CEQA. CEQA requires that a comprehensive study be made of all the biological resources in an affected area.

There is no documentation of the number of species noted, and whether or not they were actually seen. The list of birds is deficient of at least 15 species that frequent the area and are commonly seen and should not have been missed if the species noted were actually seen. The animal species is missing at least 6 species and no mention is even made of reptilian species including horned lizards and toads and frogs. Nor is there mention of the vast variety of insects including butterflies. This EIR is inadequate in its biological study of animal species.

4.1.2.3 Cumulative Impacts

This tries to justify the project on the basis of fire hydrants along Dirt Mulholland. Since these have not been a priority to allow development in the Mountains it cannot be used to justify a project to serve a subdivision that in its EIR stated that it would not bring water from the

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WHHO – 12:

Construction of a new or improved pump station alone would provide some benefit to water pressure; however, it would do little to improve service pressures to houses located in higher elevations. In addition, a new pump station, without the increase in tank capacity, would still require upgraded inlet lines as described in Alternative 3 of the EIR.

The existing Topanga Tank is kept full in operational terms. In other words, the water level in Topanga Tank is kept at an elevation of about two feet from the top to provide adequate freeboard to prevent against spillage. This level is considered “full”.

The slopes below the existing Topanga Tank are not currently known to be unstable. The existing tank was constructed in 1936 and has performed adequately since that time, which appears to demonstrate that the site is not unstable. However, prior to the design of a new tank, a comprehensive geologic and geotechnical investigation of the site would be performed and its design based on recommendations in the report. The investigation would include stability analysis of the site slopes.

See response to WHHO-10 regarding fire hydrant-related issues.

WHHO – 13:

As described in Sections 1.1 and 1.3, in addition to providing water service to the already approved Tract 33454, the proposed project would achieve the following objectives:

- 1) Create a water supply redundancy feature in the existing water service system to the southwestern San Fernando Valley area.
- 2) Provide a supplemental water supply source to the Topanga Tank service area thereby improving system pressures to existing users in the Topanga Tank service area to both residences and existing fire hydrants.
- 3) Provide a secondary source of water to the western San Fernando Valley area in case of fire or other emergency.
- 4) Meet the water demands of developments (e.g., Tract 33454) approved by the City of Los Angeles Department of City Planning.

These objectives have been added as a newly inserted Section 1.4.

WHHO – 14:

Several individuals from the City of Los Angeles were consulted in the preparation of the cumulative projects list for the Draft EIR to identify projects with the potential to contribute to cumulative impacts such as air quality emissions from construction activities, biological resources, growth inducement, public services, construction traffic, and disruption of utility services. The status and/or phase of development for each project was confirmed with each person consulted. A list of City planning representatives is provided in Section 6.0 of the EIR.

WHHO -15:

The LADWP does not “sell” water to other water service agencies. Service agreements are entered into with other “agencies” to temporarily provide water during emergency situations or when until supporting infrastructure can be provided to ensure water service reliability. This “temporarily provided” water is paid for by the “borrowing” agency. As indicated in Section 4.3.2, the proposed

project would potentially induce growth to the immediate area surrounding the project site. Additional discussion and clarification of potential growth inducing impacts and their level of significance is contained in Section 4.3. The effect of growth inducement in the Los Angeles River watershed, beyond the service area of the proposed project, is speculative and beyond the scope of this EIR.

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Corp of Engineers has publicly stated that in a 50 to 100 year storm they can expect flooding from Sherman Oaks to Long Beach.

The fact that the proposed project would increase the water storage capacity at the Kittridge site would encourage greater development and destruction of the watershed at the head of Los Angeles River and thus increase the likelihood of yearly flooding from Sherman Oaks to Long Beach.

3.11 Recreation

WHHO-16

To try and justify the project by installing drinking fountains on Mulholland is absurd. There are few on the paved portion and they have been installed by the Santa Monica Mountains Conservancy and not maintained by LADWP or Recreation and Parks.

4.0 Proposed Project and Alternative Analysis

WHHO-17

The proposed project will be the most devastating of all the proposals because the animals use both sides of Mulholland and breed where there is close proximity of water and there are numerous springs that are close to the roadway. It will impact more plant species and reptile species than any other proposal. This EIR is so deficient this section alone renders it incomplete and unacceptable as a document.

4.1 Biological Resources

WHHO-18

The fact that there was a survey covering just one day February 22, 2001 is a violation of CEQA. CEQA requires that a comprehensive study be made of all the biological resources in an affected area.

There is no documentation of the number of species noted, and whether or not they were actually seen. The list of birds is deficient of at least 15 species that frequent the area and are commonly seen and should not have been missed if the species noted were actually seen. The animal species is missing at least 6 species and no mention is even made of reptilian species including horned lizards and toads and frogs. Nor is there mention of the vast variety of insects including butterflies. This EIR is inadequate in its biological study of animal species.

4.1.2.3 Cumulative Impacts

WHHO-19

This tries to justify the project on the basis of fire hydrants along Dirt Mulholland. Since these have not been a priority to allow development in the Mountains it cannot be used to justify a project to serve a subdivision that in its EIR stated that it would not bring water from the

WHHO-19

Corbin Tank but get it from L.A. County Water district. Also, since on May 17, 1998 the proposed project was very low priority this hardly is justified by what was put in the Mulholland Scenic Parkway Specific Plan. Since this project does not put fire hydrants on Mulholland it cannot be used as a reason for the project.

4.1.3 Alternative Analysis

Alternative 1 – Mulholland Gateway Park

This is the very reason given as to why this one is unacceptable. Totally destructive.

Alternative 2 – Ellenita/Wells/Cauoga Alignment

Since this proposed project is unneeded, the fact that you stretch the facts to a level of absurdity, makes the proposed project even more preposterous. This would have little effect except on the homo sapiens or commonly know as ratepayers.

Alternative 3 – Topanga Tank Expansion

I doubt that this would be worse than the proposed project. This is not a justification for the proposed project.

No Project Alternative

This is the only one that protects the public from gross abuse of ratepayer funds that would subsidize a developer.

4.1.4 Mitigation

To say the proposed project would not have a significant impact on biological resources flies in the face of the foregoing analysis. Just the list of proposed mitigation measures tells us of the great potential impact that you could not mitigate. Since you fail to mention the impacts on species you failed to mention that reside in the area does not under CEQA absolve you from having to mitigate. The fact is you cannot mitigate the irreversible and permanent damage that you will do to this already fragile ecological area. The fact is that you have not mitigated one thing when it comes to plants and animals. You are destroying and replacing, not mitigating..

BIO -1: You admit that there will be destruction of animal nesting and resting areas. You fail to mention any other specie other than raptors. How can a DEIR be so deficient and present such a cavalier attitude?

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WHHO – 16:

As stated in Section 3.11 of the EIR, “the project would enhance the ability of the City to provide drinking fountains as per the Mulholland Scenic Parkway Specific Plan.” Installation of drinking fountains is not proposed as part of the proposed project. Additional language has been incorporated into Section 3.11 to clarify this.

WHHO – 17:

Any potential impacts to wildlife species would be avoided and/or minimized to the maximum extent practicable by the implementation of the proposed mitigation measures as described in Section 4.1.4 of the EIR. In addition, as indicated in Section 2.1.4 of the EIR, construction activities not completed by the close of each work day would be secured by fencing off open excavations or covering them with steel plates to ensure public safety. This measure would further minimize the potential impacts to animals that may potentially enter into open excavations. Though wildlife (i.e., coyotes, bobcats, mountain lions) may utilize the roadway, these animals are primarily nocturnal and travel by night. Impacts to wildlife and their migration patterns from construction activities is not considered significant since construction would only occur during the daytime. Wildlife movement would not be hindered by the project upon implementation of the project since the pipeline is a subsurface facility.

As per the author’s concern regarding the numerous springs close to “Dirt” Mulholland Drive, in fact, the proposed construction will only occur within the boundaries of the “Dirt” road itself. All water sources outside the road will not be disturbed.

WHHO – 18:

A California Natural Diversity Database (CNDDDB) search was conducted for sensitive species and the results included in the Draft and Final EIR as Appendix E. The search was conducted to provide a comprehensive list of sensitive species that may frequent the area. The CNDDDB search identifies sightings of San Diego Horned Lizard. The plant and wildlife species list generated (Appendix A and B of the Biological Survey Report, Appendix E) reflect those plant and animal species observed during the on-site survey. In some cases, only evidence of an animal’s presence was noted (i.e., scat or footprints). Follow up biological resources survey were conducted on June 4, 2001 and August 15 and 16, 2001; see Appendix E. Biology surveys conducted for the project were conducted in full compliance with United States Fish & Wildlife Service (USFWS) protocol.

WHHO-19:

In determining cumulative biological impacts, the potential future construction of fire hydrants along ‘Dirt’ Mulholland Drive to mitigate fire hazard impacts resulting from the Mulholland Scenic Parkway Specific Plan was considered, but not intended to justify the purpose and need of the project. The purpose and need for the project is to provide reliable water service to existing and future LADWP customers as well as to provide sufficient water storage supplies in the event of an emergency.

See also responses to WHHO-1 and WHHO-13.

Corbin Tank but get it from L.A. County Water district. Also, since on May 17, 1998 the proposed project was very low priority this hardly is justified by what was put in the Mulholland Scenic Parkway Specific Plan. Since this project does not put fire hydrants on Mulholland it cannot be used as a reason for the project.

4.1.3 Alternative Analysis

Alternative 1 – Mulholland Gateway Park

This is the very reason given as to why this one is unacceptable. Totally destructive.

Alternative 2 – Ellenita/Wells/Canoga Alignment

Since this proposed project is unneeded, the fact that you stretch the facts to a level of absurdity, makes the proposed project even more preposterous. This would have little effect except on the homo sapiens or commonly know as ratepayers.

WHHO-20

Alternative 3 – Topanga Tank Expansion

I doubt that this would be worse than the proposed project. This is not a justification for the proposed project.

No Project Alternative

This is the only one that protects the public from gross abuse of ratepayer funds that would subsidize a developer.

4.1.4 Mitigation

WHHO-21

To say the proposed project would not have a significant impact on biological resources flies in the face of the foregoing analysis. Just the list of proposed mitigation measures tells us of the great potential impact that you could not mitigate. Since you fail to mention the impacts on species you failed to mention that reside in the area does not under CEQA absolve you from having to mitigate. The fact is you cannot mitigate the irreversible and permanent damage that you will do to this already fragile ecological area. The fact is that you have not mitigated one thing when it comes to plants and animals. You are destroying and replacing, not mitigating.

BIO-1: You admit that there will be destruction of animal nesting and resting areas. You fail to mention any other specie other than raptors. How can a DEIR be so deficient and present such a cavalier attitude?

WHHO-21

BOI -2: You admit you will destroy older trees and replace them with small trees and plants and only look at them once in the spring and once in the fall. This shows how callous LADWP is toward the established animal and plant species. This smacks of a scorched earth policy.

BIO -3: This clearly states that there will be large destruction in the proposed project construction zone. Just the word "should" means you don't care and have no intention of protecting anything but your paycheck.

4.2 Geology and Soils

We find that the statements as to the quality of work will not exceed the minimum requirements shows that the low level of mitigations will not be met, and that all of the concerns raised makes all of the potential problems SIGNIFICANT.

Proposed Project

Unacceptable to tear up as stable geology as we have increase erosion currently due to the UNOCAL project. The project just does not need to be done.

Alternate 1 Mulholland Gateway Park

So much destruction by construction it is unacceptable. It will take 10 to fifteen years to restore what this will desecrate. The project just does not need to be done.

Alternate 2 – Ellentia/Wells/ Canoga

Not destructive to plant and animal habitat, but it, as well, is unneeded based on no proof that any problems exist except on a rare occasion that exists daily Citywide in Los Angeles and all other cities. The project just does not need to be done,

Alternative 3 – Topanga Tank Expansion

Too destructive to plant, animals and existing residents. The project just does not need to be done.

4.2.2.1 Cumulative Impact

Once again trying to use the fire hydrant red herring is unacceptable. The idea has no merit not only to cost, but also to practicability. Also you neglect to mention maintenance covers, open trench effect on slope stability, erosion, nor differential settlement. These oversights seem to be quite intentional, because if the whole EIR is not carefully read one would miss the

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WHHO – 20:

See responses to WHHO-10 through WHHO-13.

WHHO – 21:

See responses to WHHO-17 and WHHO-18.

As stated in Section 4.1.1.1 of the EIR, the “dirt” road was not found to support native vegetation or wildlife. Construction of the proposed project would not disrupt, destroy, or disturb vegetation and animals residing within the ‘Dirt’ Mulholland Drive. Any direct impacts resulting from construction activities would be avoided where practicable and, if necessary, mitigated through the implementation of the recommended mitigation measures, BIO-1, BIO-2, and BIO-3. The proposed project would not result in irreversible and/or permanent damage due to the fact that the pipeline would be constructed in an already disturbed area, the existing roadway.

As per the author’s concern regarding bird species other than raptors, the wildlife species list in Appendix B of the Biological Survey Report (Appendix E in the Final EIR) contains twenty-five bird species. For maximum protection of all bird species, Mitigation Measure BIO – 1 is revised to read:

BIO – 1: Should construction activities commence during the breeding season (late May – early August), a pre-construction focused survey shall be conducted by a qualified biologist one week prior to construction to identify the location of nesting raptors, and other birds, if any, within close proximity to the proposed construction zone. Should nesting raptors and birds be present, construction of the pipeline within 500-feet of an active nest shall be avoided until after the breeding season or the birds have fledged.

As per the author’s concern regarding mitigation for trees, appropriate planting techniques would be implemented to provide for the long-term viability of the newly planted trees. In addition, all limits of grading and construction would be clearly delineated so that no native vegetation outside the delineated limits would be disturbed by construction personnel or equipment.

BOI -2: You admit you will destroy older trees and replace them with small trees and plants and only look at them once in the spring and once in the fall. This shows how callous LADWP is toward the established animal and plant species. This smacks of a scorched earth policy.

BIO -3: This clearly states that there will be large destruction in the proposed project construction zone. Just the word "should" means you don't care and have no intention of protecting anything but your paycheck.

4.2 Geology and Soils

We find that the statements as to the quality of work will not exceed the minimum requirements shows that the low level of mitigations will not be met, and that all of the concerns raised makes all of the potential problems SIGNIFICANT.

Proposed Project

Unacceptable to tear up as stable geology as we have increase erosion currently due to the UNOCAL project. The project just does not need to be done.

Alternate 1 - Mulholland Gateway Park

WHHO-22 So much destruction by construction it is unacceptable. It will take 10 to fifteen years to restore what this will desecrate. The project just does not need to be done.

Alternate 2 - Ellentia/Wells/ Canoga

Not destructive to plant and animal habitat, but it, as well, is unneeded based on no proof that any problems exist except on a rare occasion that exists daily Citywide in Los Angeles and all other cities. The project just does not need to be done,

Alternative 3 - Topanga Tank Expansion

Too destructive to plant, animals and existing residents. The project just does not need to be done.

4.2.2.1 Cumulative Impact

WHHO-23 Once again trying to use the fire hydrant red herring is unacceptable. The idea has no merit not only to cost, but also to practicability. Also you neglect to mention maintenance covers, open trench effect on slope stability, erosion, nor differential settlement. These oversights seem to be quite intentional, because if the whole EIR is not carefully read one would miss the

WHHO-23

significant nuances that the wording clearly points out the immense significant adverse effects that will take place and will be called unavoidable because no care is required to protect this valuable resource. The cumulative impact not only geological but biological will be immensely significant and irreversible.

4.2.3 Alternative Analysis

Alternatives -1-2-3

None of the alternatives are any more susceptible than the proposed project to geology problems, but the no project alternative does not increase any risks and therefore is the preferred project.

4.2.4 Mitigation

Geo -1: The word "should" makes this not a mitigation measure because there is no assurance this will not happen.

Geo -2: Giving an alternative and not studying the possible effects makes this unacceptable.

Geo -3: The words "should limit" potential for significant erosion impacts says that you don't know and further more you don't care.

Geo -4: The words "should consider" placing covers along embankment and landscaping to minimize erosion tells us that erosion will be not only significant but the LADWP could care less about the harm it would do with going ahead with the proposed project.

4.3 Growth Inducement/Population and Housing

4.3.1 Environmental Setting

As stated in Section 15126.2 (d) of CEQA this is a growth inducing project because without water you will not have life. This pipeline is not due to pressure in the area but to subsidizing a project that will result in other areas to use the increased and oversupply of water that his project is intended to produce to insure greater development to the detriment of all the other infrastructures that are deficient and will remain deficient.

6.0 Organizations and Persons Consulted

It is interesting to note that no one from the 11th Council District was listed as contacted since this entire project is in that district. However, you did contact someone from the 3rd Council

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WHHO – 22:

Implementation of the proposed mitigation measures is considered to reduce the potential environmental impacts to a level of insignificance. All recommended mitigation measures contained within the Final EIR will be incorporated into the Mitigation Program for the proposed project, which would be presented for adoption by the Board of Water and Power Commissioners. In addition, design and construction of the pipeline would follow design and construction standards, delineated in the Los Angeles Building Code (City of Los Angeles, 1999), which is based on the California Building Code (State of California, 1998) and the Uniform Building Code (International Conference of Building Officials, 1997) and regulated by the design review, permitting, and construction inspection procedures enforced by the City of Los Angeles. Therefore, the pipeline would be designed and constructed following the current standard of practice. In addition, geotechnical criteria, such as the degree of backfill compaction that is appropriate, would be specified by the geotechnical engineer. Construction of the pipeline will meet or exceed these criteria. The geotechnical engineer of record would be required to verify that these criteria are met during construction.

Responses to concerns raised about each of the alternatives is provided in responses WHHO – 10, WHHO – 11, and WHHO – 12. The analysis of the alternatives concerning biological resources and geology/soils is provided in Section 4.2.2 and 4.2.3.

WHHO – 23:

See responses to WHHO-7, WHHO-8 and WHHO – 10. Open trench effects on slope stability, erosion potential, and differential settlement are addressed in Section 4.2.2 of the EIR. A fifth mitigation measures, GEO –5 , has been added to ensure that differential settlement is minimized, if not altogether avoided, and that the stability of the slopes is protected. See Section 4.2.4 of the EIR.

significant nuances that the wording clearly points out the immense significant adverse effects that will take place and will be called unavoidable because no care is required to protect this valuable resource. The cumulative impact not only geological but biological will be immensely significant and irreversible.

4.2.3 Alternative Analysis

Alternatives -1-2-3

WHHO-24

None of the alternatives are any more susceptible than the proposed project to geology problems, but the no project alternative does not increase any risks and therefore is the preferred project.

4.2.4 Mitigation

WHHO-25

Geo -1: The word "should" makes this not a mitigation measure because there is no assurance this will not happen.

Geo -2: Giving an alternative and not studying the possible effects makes this unacceptable.

Geo -3: The words "should limit" potential for significant erosion impacts says that you don't know and further more you don't care.

Geo -4: The words "should consider" placing covers along embankment and landscaping to minimize erosion tells us that erosion will be not only significant but the LADWP could care less about the harm it would do with going ahead with the proposed project.

4.3 Growth Inducement/Population and Housing

4.3.1 Environmental Setting

WHHO-26

As stated in Section 15126.2 (d) of CEQA this is a growth inducing project because without water you will not have life. This pipeline is not due to pressure in the area but to subsidizing a project that will result in other areas to use the increased and oversupply of water that his project is intended to produce to insure greater development to the detriment of all the other infrastructures that are deficient and will remain deficient.

6.0 Organizations and Persons Consulted

WHHO-27

It is interesting to note that no one from the 11th Council District was listed as contacted since this entire project is in that district. However, you did contact someone from the 3rd Council

WHHO-27

District and it is north of the freeway. Those you did contact from the Planning Department are very unknowledgeable about the area, geology and growth patterns as well as infrastructure of the area.

ADDITIONAL COMMENTS

This DEIR did not address the concerns from the letter dated July 26th, 2000 by the Santa Monica Mountains Conservancy.

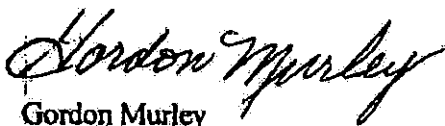
This DEIR did not address issues raised in the letters dated July 14, 2000 and December 26, 2000 by Mulholland Tomorrow.

1. Kittridge Task expansion alone.
2. Connecting to MWD pipeline for redundancy. This has not been addressed in any of the CEQA documents generated for this project.
3. The cumulative impacts on all environmental issues is not addressed .

This DEIR failed to address the concerns by a noted Engineering Geologist, James E. Slosson, Ph.D. Failure to address the concerns in his letter dated July 14th makes this DEIR inadequate. This DEIR makes the same statements that Mr. Slosson addressed as incorrect.

We find this DEIR does not meet the intent of CEQA because it does not fully address the total in an unbiased manner as required. The omissions are glaring and have been pointed out here and the past letters.

Respectfully



Gordon Murley
President

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WHHO – 24:

The comment is noted and will be forwarded to the appropriate decision-makers for consideration.

WHHO – 25:

Mitigation measures GEO – 1 and GEO – 2 are revised to reflect the change in text from “should” to “will.” If Alternative 3 is considered, an evaluation of seismically induced flooding would be performed.

Mitigation measure GEO – 3 is revised to reflect the change in text from “should limit” to “would greatly reduce.” The types of erosion control measures noted in the EIR are commonly employed during construction activities throughout southern California and are known to be effective. There is no reason to doubt that these erosion control measures would not be effective for either the proposed project or alternatives. However, as noted in the EIR, limited wind and water erosion might occur locally during the construction. The construction contract for the project will include provisions to repair any significant erosion that may occur as a result of construction activities.

Mitigation measure GEO – 4 is revised to read:

“Should maintenance hole covers be installed, they will be located adjacent to and on the downhill side of the roadway. The soil around the entrance to the maintenance holes will be landscaped with native vegetation to maintain erosion potential at its current level or better.”

Also, see response to GEO-3.

WHHO – 26:

See response to SMMC-5. In addition, growth in the immediate project vicinity has actually slowed due largely to the active pursuit by the Santa Monica Mountains Conservancy to acquire undeveloped land and maintain it as open space in perpetuity.

The remainder of the comment refers to project funding and does not relate to the potential environmental impacts that may be associated with the proposed project. The comment is noted and will be forwarded to the appropriate decision-makers for consideration.

WHHO –27:

The Chief Field Deputy of Council District 11 was consulted to assess the cumulative and growth inducing impacts of the proposed project. Additional inquiries were made to the City Planner for the Mulholland Scenic Parkway Specific Plan. All projects before the Design Review Board of the Mulholland Scenic Parkway Specific Plan were reviewed at the Valley District 11 office on Ventura Boulevard in Encino. As part of the Final EIR, a formal written inquiry (via e-mail) was sent to Council District 11 to solicit input on development and growth potential in the area. The District commented that sale of the Avatar property to the SMMC is considered certain, and that there is strong interest by the Santa Monica Mountains Conservancy to purchase the 21000 Mulholland property, the status of negotiations of which is not certain (City of Los Angeles, 2001). See Sections 1.5 and 4.3.1.4 of the EIR.

District and it is north of the freeway. Those you did contact from the Planning Department are very unknowledgeable about the area, geology and growth patterns as well as infrastructure of the area.

ADDITIONAL COMMENTS

This DEIR did not address the concerns from the letter dated July 26th, 2000 by the Santa Monica Mountains Conservancy.

This DEIR did not address issues raised in the letters dated July 14, 2000 and December 26, 2000 by Mulholland Tomorrow.

WHHO-28

1. Kirtledge Task expansion alone.
2. Connecting to MWD pipeline for redundancy. This has not been addressed in any of the CEQA documents generated for this project.
3. The cumulative impacts on all environmental issues is not addressed.

This DEIR failed to address the concerns by a noted Engineering Geologist, James E. Slosson, Ph.D. Failure to address the concerns in his letter dated July 14th makes this DEIR inadequate. This DEIR makes the same statements that Mr. Slosson addressed as incorrect.

We find this DEIR does not meet the intent of CEQA because it does not fully address the total in an unbiased manner as required. The omissions are glaring and have been pointed out here and the past letters.

Respectfully



Gordon Murley
President

WHHO – 28:

Concerns raised in the July 26, 2000 comment letter from the Santa Monica Mountains Conservancy are addressed in the EIR, as follows:

- 1) The Topanga Tank Alternative, referenced in the 1997 Mulholland Pipeline Report, is an alternative evaluated in the EIR.
- 2) Future water service demands in the City of Los Angeles are uncertain. Consequently, there is “no guarantee that future related projects will not be proposed by the Department.”
- 3) The funding source of the proposed project is not related to the environmental impacts of the proposed project, and is not required by CEQA.
- 4) Tract 33454 is an approved development. Acquisition of this property is beyond the scope of the proposed project. In addition, construction of a water tank at an elevation of 1,260 feet would be incapable of providing water to a higher elevation.
- 5) The Corbin Tank EIR indicates that a total of 13,790 linear feet of water main would be constructed along Mulholland Drive westerly from the Corbin Tank.
- 6) The growth inducing impacts of the proposed project have been addressed in Section 4.3 of the Draft EIR.

The following concerns raised in the July 14, 2000 and December 26, 2000 comment letters from Mulholland Tomorrow have been addressed in the EIR, as follows:

- 1) Expansion of the Kittridge Tanks would only increase storage in case of emergency. This option would neither increase system pressures to the eastern portion of the 1337-foot service zone (Topanga Tank service zone) nor provide water to Tract 33454.
- 2) Connection to the MWD line would only serve as an emergency connection since this line is the primary water conveyance source to Ventura County. Additionally, this connection would be located to the west of the area that would be served by the proposed project. The proposed project would bring water from the east, creating a loop where none exists now. The MWD connection would not remedy the existing water service “dead-end”.
- 3) Comment noted. Pursuant to Section 15143 of the CEQA Guidelines, the EIR focuses on the significant effects on the environment. “Effects dismissed in an Initial Study as clearly insignificant and unlikely to occur need not be discussed further in the EIR.” Consequently, the cumulative impacts of those environmental effects identified as clearly insignificant were not discussed any further in the EIR.

Mr. Slosson’s comments refer to the existing geological conditions of the project site and their potential impacts on the proposed project, not the impact of the proposed project on the geologic environment, pursuant to CEQA. The EIR adequately addresses issues raised in Mr. Slosson’s letter. (See subsequent geology report prepared by URS Corporation contained in Appendix F of the EIR).

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FAX TRANSMISSION

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To: Kelvin Lew
Department of Water and Power

Date: June 11, 2001

Fax #: (213) 367-3852

Pages: 18, including this cover sheet.

From: Barry Read

Subject: Comments on DEIR for Mulholland Pipeline Project

Mulholland Tomorrow

President
Robert M. Hertzberg

Board of Directors
Irving Azoff
Warren Beatty
Robert S. Colbert
Don Henley
Robert M. Hertzberg
Gale Anne Murd
Paul Middel
Jack Nicholson

June 11, 2001

Mr. Kelvin Lew
City of Los Angeles,
Department of Water and power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Re: Mulholland Water Pipeline Project — Draft Environmental
Impact Report

Dear Mr. Lew:

On behalf of Mulholland Tomorrow, I am submitting the comments below on the Draft Environmental Impact Report distributed by the Department of Water and Power for the Mulholland Water Pipeline Project.

MT-1

After reviewing the DEIR, it remains Mulholland Tomorrow's position that the information on the environmental impacts of this project, as contained in this document, is insufficient and the conclusions reached are largely unfounded. We urge the Department to prepare a full, complete, and unbiased Environmental Impact Report on this proposal, including a reconsideration of alternatives to the proposed pipeline route. It is further our position, based on our review of this document and the project as a whole, that the expenditure of public funds for the proposed water pipeline is unwarranted by any of the objectives stated, constitutes a potential gift of public funds and resources to private entities, and overlooks and obscures the environmental and economic impacts this project would have on the Santa Monica Mountains, the San Fernando Valley, the Mulholland Scenic Corridor, and the neighborhoods and communities affected by this project. We also strongly urge the Department to hold public hearings on this DEIR and obtain further comments before proceeding to the preparation of a Final EIR.

Our specific comments on the DEIR are as follows:

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MT – 1:

The comment is of a general nature. Specific issues raised are addressed in the following responses specifically in MT-11, MT-13, MT-14, MT-15, and MT-16.

General Comment. The DEIR evidences confusion and misunderstanding about the Mulholland Scenic Parkway Specific Plan. The Mulholland Scenic Parkway Specific Plan is a City ordinance (Ordinance 167,843) that was adopted on May 13, 1992. In several places, the DEIR attributes statements to the Specific Plan which are not to be found in that ordinance. For example, on Page 3-1, the DEIR states:

"The Mulholland Scenic Parkway Scenic Plan classifies the project area as 'distinctive' in its spatial experience during the day and nighttime as 'typical' in its landforms (City of Los Angeles, 1992)."

The Specific Plan contains no such classification. Similarly, on Page 4-13, the DEIR states:

MT-2

"The Plan calls for the installation of fire hydrants along 'Dirt' Mulholland as mitigation to address the potential for increased fire hazards resulting from implementation of the Plan."

The Specific Plan contains no reference to the installation of fire hydrants along "Dirt" Mulholland or anywhere else along the Mulholland Scenic Corridor.

The preparers of the DEIR have apparently confused the Specific Plan with the Environmental Impact Report prepared on the Specific Plan in 1985. The Specific Plan is a City ordinance which has the force of law. The Environmental Impact Report is a decision document. The inability to distinguish between these two very distinct and very essential documents raises doubts about the quality of research and analysis underlying other portions of the DEIR.

MT-3

Project Description. The description of this project is inadequate to permit the public or the decision makers to make an informed evaluation of the impacts of the project. The description in the DEIR is limited to a description of where and how the proposed pipeline is to be constructed. It does not describe how the proposed pipeline will be integrated into and operated within the DWP water supply system. For example, the DEIR does not explain how the Corbin Tank and the Topanga Tank are currently potentially connected through existing water pipelines between the Adele and Girard pumping stations. These descriptions are necessary to facilitate an assessment of the purposes and impacts of the proposed project — how this proposed project would enhance water supply reliability, what areas of the City will receive water carried by the proposed pipeline, and what areas of the City will be affected by the changes in water service resulting from the proposed project.

MT-4

The description of the project should also include additional information about the DWP water system affected by the proposed project (i.e., the water supply system for the West San Fernando Valley) and about planned and foreseeable additions and modifications to that system. This information is necessary to the reasoned identification of feasible alternatives to the proposed project, and to the evaluation of

MT-4 those alternatives compared to the proposed project. The truncation of the project description in the DEIR makes a full assessment of the environmental impacts of the proposed project and alternatives impossible.

The description of the proposed project should also include adequate information about the environmental setting of the proposed project to facilitate a reasonable consideration of the impacts of and alternatives to the proposed project. For example, the DEIR does not discuss currently planned improvements in the DWP water system that may be relevant to the proposed project. Evaluation of the alternatives to the proposed project — and particularly the No Project alternative — might reach different conclusions if these known and reasonably foreseeable projects were included in the project's environmental setting.

The description of the proposed project indicates that the pipeline is to be constructed in the roadway of Mulholland Drive. If there is any potential, however, that the pipeline will leave the roadway (see, for instance, the letter dated July 26, 2000, from the Santa Monica Mountains Conservancy regarding the Conservancy's unwillingness to permit construction across its property), the impacts of this portion of the project, particularly on biological resources and geological stability, should be examined under CEQA.

Purpose and Need. The DEIR states (Page No. 1-3) that between 1992 and 1999, 111 complaints — up from 31 complaints in the Draft Initial Study — were received from DWP customers citing "no water" and "low water pressure." Just as in the Draft Initial Study, however, there is nothing in the DEIR to link these complaints to any circumstances that would be alleviated by the construction of the proposed project. Mulholland Tomorrow has received and reviewed a large number of these complaints that were produced by DWP pursuant to a Public Records Act request. It was evident that many of these complaints would be unmitigated by the construction of a pipeline — they were found to be caused by malfunctioning equipment installed at the complainant's individual residence, or they were due to construction, repairs or accidents that would not be prevented by the proposed project. Discussion of these complaints should be deleted from the Final EIR, or else the Final EIR should explain:

- a. What type of complaints were made? Were they all from residential water users? Did they complain of persistent pressure problems, or episodic instances? Are the complaints only related to pressure and not supply? If so, why isn't the project directed specifically toward measures to improve pressure?
- b. When were these complaints received? Were they received recently or throughout the ten year period? Did a significant number of them follow the Northridge earthquake? Has the number of complaints been consistent throughout the decade?
- c. From what areas of the Southwestern San Fernando Valley did these complaints originate? The Girard Tract? From within the service area of this project?
- d. How would this project address those complaints? Will these properties be connected to the proposed water line?

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MT – 2:

Comment acknowledged. The EIR inadvertently references the Mulholland Scenic Parkway Specific Plan (Specific Plan) instead of the Specific Plan EIR in two instances (Sections 3.1 and 3.11). Such references have been corrected in the Final EIR.

The Specific Plan EIR, which served as a decision making tool, identified potentially significant environmental impacts resulting from the implementation of the Specific Plan, as well as measures for mitigating those impacts. Approval of the Specific Plan and adoption of the plan as a City ordinance (Ordinance 167.943) was contingent upon certification of the EIR and the recommended mitigation measures contained within it.

MT – 3:

Comment noted. The following text has been incorporated into Section 2.1 of the EIR. “ The proposed pipeline would operate by gravity, whereby it would convey water from the existing Corbin Tank (1677-foot elevation system) to the existing Topanga Tank (1337-foot elevation system) and Kittridge Tanks (1305-foot elevation system) service zones.”

Regarding the potential connection between the Adele and Girard pumping stations: there is no connection from the Corbin Tank (1677-foot system) to the Topanga Tank (1337-foot system) through the Adele and Girard Pumping Stations. The discharge side of the Girard Pumping Station (1240-foot system) serves as the suction side of the Adele Pumping Station (1677-foot system) during emergencies. In addition, there is an isolation valve between the Adele and Girard Pump Stations, which is normally closed and isolates the two pump stations from each other. The normal supply to the 1240-foot system comes from Winnetka and Wells Drive Pump Stations. A new pipeline would still need to be constructed to connect the 1677-foot system to the 1337-foot system, which is what the proposed project would accomplish. It is the eastern portion of the 1337-foot system that would primarily receive and be affected by the higher elevation water.

MT – 4:

As indicated in the project description, the proposed project would provide an additional source of water (i.e., provide redundancy supply) to portions of the western San Fernando Valley in the event of an emergency. Available water from the Corbin Tank would be provided to the Topanga and Kittridge Tanks service zones. There are no foreseeable additions or modifications to the water system in the western San Fernando Valley that would be served by the proposed project.

those alternatives compared to the proposed project. The truncation of the project description in the DEIR makes a full assessment of the environmental impacts of the proposed project and alternatives impossible.

MT-5 The description of the proposed project should also include adequate information about the environmental setting of the proposed project to facilitate a reasonable consideration of the impacts of and alternatives to the proposed project. For example, the DEIR does not discuss currently planned improvements in the DWP water system that may be relevant to the proposed project. Evaluation of the alternatives to the proposed project — and particularly the No Project alternative — might reach different conclusions if these known and reasonably foreseeable projects were included in the project's environmental setting.

MT-6 The description of the proposed project indicates that the pipeline is to be constructed in the roadway of Mulholland Drive. If there is any potential, however, that the pipeline will leave the roadway (see, for instance, the letter dated July 26, 2000, from the Santa Monica Mountains Conservancy regarding the Conservancy's unwillingness to permit construction across its property), the impacts of this portion of the project, particularly on biological resources and geological stability, should be examined under CEQA.

MT-7 **Purpose and Need.** The DEIR states (Page No. 1-3) that between 1992 and 1999, 111 complaints — up from 31 complaints in the Draft Initial Study — were received from DWP customers citing "no water" and "low water pressure." Just as in the Draft Initial Study, however, there is nothing in the DEIR to link these complaints to any circumstances that would be alleviated by the construction of the proposed project. Mulholland Tomorrow has received and reviewed a large number of these complaints that were produced by DWP pursuant to a Public Records Act request. It was evident that many of these complaints would be unmitigated by the construction of a pipeline — they were found to be caused by malfunctioning equipment installed at the complainant's individual residence, or they were due to construction, repairs or accidents that would not be prevented by the proposed project. Discussion of these complaints should be deleted from the Final EIR, or else the Final EIR should explain:

- What type of complaints were made? Were they all from residential water users? Did they complain of persistent pressure problems, or episodic instances? Are the complaints only related to pressure and not supply? If so, why isn't the project directed specifically toward measures to improve pressure?
- When were these complaints received? Were they received recently or throughout the ten year period? Did a significant number of them follow the Northridge earthquake? Has the number of complaints been consistent throughout the decade?
- From what areas of the Southwestern San Fernando Valley did these complaints originate? The Girard Tract? From within the service area of this project?
- How would this project address those complaints? Will these properties be connected to the proposed water line?

MT-7

- e. How does this complaint rate compare to other areas? For similar numbers of customers, or geographically similar areas elsewhere in the City, is this a substantially larger number of complaints?
- f. Why is the Department proposing to spend \$3 million to address 111 complaints over a 10-year period?
- g. How does the conveyance of water from the Department's system to the County system at the Topanga Tank affect the pressure and reliability of water in the service area of the proposed water pipeline? Are these conveyances being addressed in this project?

Further, a stated primary purpose of the project is to provide an alternative source of water service to the West San Fernando Valley. Presumably, the West Valley has an adequate source of water to meet service demand under normal conditions, and the Corbin Tank alternative would only be required under emergency conditions (e.g., fire, earthquake). Under normal circumstances — that is, the vast majority of time that the pipeline is in operation — the Mulholland water pipeline would either be (a) empty, except for the water it will provide to the proposed subdivision at Tract No 33454, or (b) full, carrying water that is not currently needed to meet demand in the West Valley. The DEIR states that the proposed project is being constructed to provide water at a rate of 13 cfs, but normal usage will only be 2-3 cfs. (Page No. 2-2) The conclusion then is that (a) the water pipeline is being constructed largely at the ratepayer's expense primarily to service Tract No. 33454, or (b) the water pipeline is being constructed to increase the supply of water to the West San Fernando Valley, thereby fostering increased water usage and inducing growth. These impacts are not identified or addressed in the DEIR.

More specifically, the DEIR states (Page No. 2-1) that "the 18-inch line would be dedicated for emergency purposes while the existing 12-inch line would provide domestic and fire protection to residences." From this statement, it appears that there will be no substantial improvements in either fire protection or residential water pressure, as cited in the DEIR. The Final EIR should explain how the existing 12-inch water pipeline will be used in coordination with the proposed 18-inch pipeline in inadequate to achieve the claimed purposes of the proposed project.

Alternatives Selection. The selection and identification of alternatives to be examined in the DEIR is inadequate. First, the DEIR ignores alternatives to the proposed project that would call for a regional approach to providing redundancy in water supply to the West San Fernando Valley. Second, the DEIR ignores nonstructural alternatives to the construction of a water pipeline or water tanks. Third, the alternatives chosen for analysis include two — the Mulholland Gateway Park alternative and the Ellenita/Wells/Canoga Alignment — that have such obvious flaws as to render them infeasible on their face and their selection as alternatives for evaluation questionable. The Mulholland Gateway Park alternative would traverse an open space and parkland, with apparent and anticipated environmental impacts. The only apparent explanation for the selection of this alternative is that this route would

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MT – 5:

The proposed project is the only currently planned improvement in the San Fernando Valley that would serve the southwestern San Fernando Valley area.

MT – 6:

Comment acknowledged. As indicated in Section 1.1 of the EIR, “the proposed project would be constructed within the existing roadway.” Moreover, the proposed project is not prohibited under the MSPSP and is within the existing right-of-way negotiated with the SMMC. Should it be determined that the proposed project alignment would deviate from the existing roadway, the project would be further reviewed under CEQA.

MT – 7:

Comment acknowledged. The customer complaints referenced in the EIR were intended to provide an easy-to-understand illustration of the pressure problems experienced in the proposed project’s service area. A more technical analysis of fire hydrants in the proposed project service area, also indicated that system pressures were inadequate. It was felt that the customer service complaints would illustrate the pressure problems in the area and consequently, the hydrant data was not considered necessary to include in the EIR. The hydrant analysis consisted of pressure readings taken over a two month period in August and September 2000 at three discrete hydrant locations. At one of these hydrants, located on Mulholland Drive at Rosario Road, pressures were found to range from 3 to 18 psi. The current Los Angeles Fire Department minimum pressure for operation is 20 psi. In addition, follow-up readings were taken at these hydrants in July and August 2001. Follow-up readings were found to be consistent with earlier readings and are included in Appendix I of the EIR. Please also see Response to MIS-2.

- e. How does this complaint rate compare to other areas? For similar numbers of customers, or geographically similar areas elsewhere in the City, is this a substantially larger number of complaints?
- f. Why is the Department proposing to spend \$3 million to address 111 complaints over a 10-year period?
- g. How does the conveyance of water from the Department's system to the County system at the Topanga Tank affect the pressure and reliability of water in the service area of the proposed water pipeline? Are these conveyances being addressed in this project?

MT-8

Further, a stated primary purpose of the project is to provide an alternative source of water service to the West San Fernando Valley. Presumably, the West Valley has an adequate source of water to meet service demand under normal conditions, and the Corbin Tank alternative would only be required under emergency conditions (e.g., fire, earthquake). Under normal circumstances — that is, the vast majority of time that the pipeline is in operation — the Mulholland water pipeline would either be (a) empty, except for the water it will provide to the proposed subdivision at Tract No 33454, or (b) full, carrying water that is not currently needed to meet demand in the West Valley. The DEIR states that the proposed project is being constructed to provide water at a rate of 13 cfs, but normal usage will only be 2-3 cfs. (Page No. 2-2) The conclusion then is that (a) the water pipeline is being constructed largely at the ratepayer's expense primarily to service Tract No. 33454, or (b) the water pipeline is being constructed to increase the supply of water to the West San Fernando Valley, thereby fostering increased water usage and inducing growth. These impacts are not identified or addressed in the DEIR.

MT-9

More specifically, the DEIR states (Page No. 2-1) that "the 18-inch line would be dedicated for emergency purposes while the existing 12-inch line would provide domestic and fire protection to residences." From this statement, it appears that there will be no substantial improvements in either fire protection or residential water pressure, as cited in the DEIR. The Final EIR should explain how the existing 12-inch water pipeline will be used in coordination with the proposed 18-inch pipeline in inadequate to achieve the claimed purposes of the proposed project.

MT-10

Alternatives Selection. The selection and identification of alternatives to be examined in the DEIR is inadequate. First, the DEIR ignores alternatives to the proposed project that would call for a regional approach to providing redundancy in water supply to the West San Fernando Valley. Second, the DEIR ignores nonstructural alternatives to the construction of a water pipeline or water tanks. Third, the alternatives chosen for analysis include two — the Mulholland Gateway Park alternative and the Ellenita/Wells/ Canoga Alignment — that have such obvious flaws as to render them infeasible on their face and their selection as alternatives for evaluation questionable. The Mulholland Gateway Park alternative would traverse an open space and parkland, with apparent and anticipated environmental impacts. The only apparent explanation for the selection of this alternative is that this route would

MT-10

follow a once-designated roadway that is no longer going to be built through a residential development that is not going to be built. The Ellenita/Wells/Canoga Alignment would go through established residential areas, with apparent and anticipated social impacts. Fourth, the alternatives analysis does not evaluate whether the separate purposes identified for this project — redundancy in water supply, provision of water to Tract No. 33454, and fire protection (see discussion below) — cannot be met more economically, more effectively and with fewer environmental impacts by separate projects, rather than a single project.

The Final EIR should include consideration of the impacts of the following alternative measures, among others:

Topanga Canyon Trunk Line — The Final EIR should consider the alternative of a permanent emergency connection between the DWP water system and the County of Los Angeles water system. The Public Works Department of the County of Los Angeles has proposed to construct a major water line up Topanga Canyon to increase and improve water service to the portions of the County adjacent to the Mulholland pipeline service area. Under an arrangement similar to that under which the County currently diverts water from the DWP system in an emergency, the DWP could arrange to divert water from the County's Topanga line. Since the planning horizon for water supply systems can be decades long, inter-connecting the two systems could provide for greater long-term security of supply than expanding a single system.

Metropolitan Water District — The DEIR points out (Page 1-2) that there is currently a contractual water supply relationship between DWP and the Metropolitan Water District. The Final EIR should consider the alternative of a permanent emergency connection between the DWP water system and the Metropolitan Water District water system. The Metropolitan Water District's West Valley and Calabasas Feeder lines parallel the Granada Trunk over much of its length. Interconnections between these lines at, for instance, Leonora and Valley Circle, could enhance system reliability in the West Valley by allowing each system to support the other in times of system outages.

Portable Pumping Equipment — The Final EIR should evaluate the impacts of the Department purchasing portable pumping equipment to respond to water outages caused by pipeline breaks and equipment malfunctions. The goal of increasing the reliability of the water system in the West San Fernando Valley has been explained by the Department, in part, as an effort to ensure that water can be provided to this area in times of emergency, such as the 1994 Northridge earthquake, or other instances of major disruptions from power outages and equipment failure. The DEIR states (Page 1-3, 1-4) that during the 1994 Northridge earthquake, failures in the water lines serving the West Valley were "patched" on a temporary basis by employing fire department pumper trucks to pump water around the breaks. As a non-structural alternative, the Department

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MT – 8:

As stated in Section 2.1, “the new pipeline could convey up to 13 cubic feet per second... of water; however the typical flow would be two to three cfs.” The 13 cfs is the maximum amount of water capable of being conveyed in an emergency situation. Emergency water service, by nature, is not considered a new source of continuously available water, and is therefore not considered growth inducing.

MT – 9:

As stated in Section 2.1 of the EIR: “The existing 12-inch line, located in Mulholland Drive between Saltillo Street and Picasso Avenue, may be abandoned some time in the future. The existing pipeline is still in good condition but it is too small to handle the flows from the new 16-inch line. The operation of both lines would be more efficient where the 16-inch line would be dedicated for emergency purposes while the existing 12-inch line would provide domestic and fire protection to residents.” The proposed project would provide an additional source of water (from Corbin Tank) to residents in the 1337-foot service area, which would be a substantial and immediate improvement in both fire protection and residential water pressure. When the existing 12-inch line is abandoned, the new 16-inch line would serve both functions: water service to the southwestern San Fernando Valley (1337-foot service zone) and emergency service to the western San Fernando Valley (the southern portion of the 1305-foot service zone).

MT – 10:

Pursuant to Section 15126.6 of the CEQA Guidelines, the EIR describes “a range or reasonable alternatives to the project or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” An EIR need not consider every conceivable alternative to a project.

Although no significant impacts were anticipated to occur from the construction of the proposed project, based on the comments received during the public review of the Proposed Negative Declaration initially prepared for the proposed project, it was decided that an EIR be prepared. Alternatives mentioned in the Notice of Preparation and subsequently evaluated in the Draft EIR were selected based on comments received during the Negative Declaration review period. Alternatives were selected as follows:

1. Mulholland Gateway Park – proposed as a part of approved Tentative Tract #50784.
2. Ellenita/Wells/Canoga Alignment – suggested by representatives of Tarzana Property Owners Association and Woodland Hills Homeowners Association.
3. Topanga Tank Alternative – suggested by several commentors referencing the 1997 Mulholland Pipeline Report.
4. No Project – pursuant to Section 15126.6 of the CEQA Guidelines.

Water service redundancy throughout the City of Los Angeles is a goal of the LADWP. The Topanga Tank Service area (1337-foot service zone) is a water service “dead-end”. Plans to connect the 1677-foot service zone with the 1337-foot service zone, thus providing a redundancy feature to this area, were described in the Corbin Tank EIR.

should consider purchasing and having available its own portable pumping equipment and related equipment that can be dispatched to these emergency locations. By having its own equipment, the Department could avoid conflicts with the Fire Department over priorities in the use of this equipment, and could use the equipment in other parts of the Department's service area. By having its own equipment, the Department could also increase the flexibility of its response to outages, particularly in the event that water pipelines are damaged throughout the region in another seismic incident.

MT-14

Construction of Water Tank at Tract 33454 — The Final EIR should evaluate the impact of providing water to Tract 33454 from the existing water line, located in Mulholland Drive, and storing the water in a storage facility to be located on-site. Improvement of the Girard pumping station and the water lines adjacent to Tract 33454 may be necessary to achieve the necessary increases in water quantity and water pressure. The water could be pumped to a storage facility located on Tract 33454. The storage facility would have to be located on a site that is not a visible ridge, a designated open space, or other environmentally sensitive area, such as in the "bowl" of Tract 33454 within a portion of the tract currently designated for development.

MT-15

Construction/expansion of existing 1240' water pipeline — The Department's West Valley District System Supply Map depicts a 12-inch water line connecting the Adele Pumping Station and the Girard Pumping Station. The Final EIR should evaluate the impacts of expanding and/or modifying this existing line, as necessary, to provide the link between the Corbin Tank and both Tract 33454 and the Girard Trunk. Because a waterline exists in this location, the costs and disruption of construction of a new or expanded water pipeline should have fewer impacts than the construction of a new line in a new location.

MT-16

Improvements to the Existing DWP System — The DEIR states (Page No. 2-1) that the proposed project "defers the need for additional water storage facilities and the replacement of pipelines within the currently developed area." The DEIR should discuss an alternative that includes the DWP's planned or foreseeable water storage and pipeline replacement projects in the vicinity of the proposed project. The DEIR should also discuss whether these planned and foreseeable projects would obviate or mitigate the need for the proposed project.

Alternatives — Description. The descriptions of the Alternatives to the proposed project in the DEIR are inadequate to allow a reasoned evaluation of their ability to address the purposes of the proposed project, or to compare the impacts of the alternatives and the proposal.

MT-17

Expansion of Kittridge Tanks — As part of Alternative 3 — the Expansion of the Topanga Tank — the DEIR includes the possible expansion of the Kittridge

follow a once-designated roadway that is no longer going to be built through a residential development that is not going to be built. The Ellenita/Wells/Canoga Alignment would go through established residential areas, with apparent and anticipated social impacts. Fourth, the alternatives analysis does not evaluate whether the separate purposes identified for this project — redundancy in water supply, provision of water to Tract No. 33454, and fire protection (see discussion below) — cannot be met more economically, more effectively and with fewer environmental impacts by separate projects, rather than a single project.

The Final EIR should include consideration of the impacts of the following alternative measures, among others:

MT-11

Topanga Canyon Trunk Line — The Final EIR should consider the alternative of a permanent emergency connection between the DWP water system and the County of Los Angeles water system. The Public Works Department of the County of Los Angeles has proposed to construct a major water line up Topanga Canyon to increase and improve water service to the portions of the County adjacent to the Mulholland pipeline service area. Under an arrangement similar to that under which the County currently diverts water from the DWP system in an emergency, the DWP could arrange to divert water from the County's Topanga line. Since the planning horizon for water supply systems can be decades long, inter-connecting the two systems could provide for greater long-term security of supply than expanding a single system.

MT-12

Metropolitan Water District — The DEIR points out (Page 1-2) that there is currently a contractual water supply relationship between DWP and the Metropolitan Water District. The Final EIR should consider the alternative of a permanent emergency connection between the DWP water system and the Metropolitan Water District water system. The Metropolitan Water District's West Valley and Calabasas Feeder lines parallel the Granada Trunk over much of its length. Interconnections between these lines at, for instance, Leonora and Valley Circle, could enhance system reliability in the West Valley by allowing each system to support the other in times of system outages.

MT-13

Portable Pumping Equipment — The Final EIR should evaluate the impacts of the Department purchasing portable pumping equipment to respond to water outages caused by pipeline breaks and equipment malfunctions. The goal of increasing the reliability of the water system in the West San Fernando Valley has been explained by the Department, in part, as an effort to ensure that water can be provided to this area in times of emergency, such as the 1994 Northridge earthquake, or other instances of major disruptions from power outages and equipment failure. The DEIR states (Page 1-3, 1-4) that during the 1994 Northridge earthquake, failures in the water lines serving the West Valley were "patched" on a temporary basis by employing fire department pumper trucks to pump water around the breaks. As a non-structural alternative, the Department

MT – 11:

See response to MT-10, above. The additional alternatives suggested in the comment letter and also proposed in comments received on the Notice of Preparation were not evaluated for the following reasons:

County of Los Angeles Topanga Canyon Trunk Line – This alternative would achieve a single objective, providing emergency service to the 1305 service zone. It is uncertain if this line will be constructed any time in the foreseeable future. In addition, reliance on other water service providers for water service, even under emergency situations, is not practical because LADWP would be unable to assure the availability of this water in the future. Furthermore, until this pipeline is constructed, it is uncertain if the hydraulic grade or capacity of the line would be capable of providing emergency service to LADWP customers in the area.

MT – 12:

Metropolitan Water District – See response to MT-11 above.

MT – 13:

Portable Pumping Equipment – This alternative is practically infeasible and would achieve only a single project objective, emergency service. In addition to requiring continuous maintenance to assure the dependable operation, the mobilization and operation of equipment in the event of an emergency would divert personnel and resources away from other areas of need in the event of an emergency. The diversion of water in the proposed pipeline would require the opening and/or closing of a valve gate by a single individual. This alternative would not improve existing water service.

MT-17

Tank facility by constructing one or more additional tanks at this existing facility. There is, however, no description of the size or configuration of this expansion, or of how this expansion would address the purposes of the project. Further, the DEIR admittedly contains no analysis of the geological or biological conditions at this site. This facility currently provides additional stored water to serve the West Valley area during interruptions of water supply through the Granada Trunk line. Expansion of the tank capacity at this location would provide still-greater redundancy in water supply. Because this site is already the location of storage facilities, and additional construction should have minimal environmental impact, the expansion of this facility should be considered as a stand-alone alternative to the proposed project.

Ellenita/Wells/Canoga Alignment — The DEIR (Page 2-7) proposes routing the water pipeline through existing streets and neighborhoods along Ellenita, Wells, and Canoga Streets. The description of this alternative is inadequate in part because it does not recognize that DWP routinely excavates streets in routine pipeline construction projects. For instance, DWP recently completed a several months-long excavation of Mulholland Drive between Laurel Canyon and Beverly Glen (probably pursuant to a categorical exemption from CEQA and without an EIR). The description of this alternative also does not explain why this alternative would require the construction of a 20-inch, rather than a 16-inch, pipeline. The description also does not explain why the proposed pipeline cannot connect to the existing pipeline in Wells Avenue, thereby reducing the amount of trenching and limiting the environmental impact of this alternative. The description of this alternative should contain information sufficient to permit the public and decision makers to compare this project to the scope and number of other pipeline projects DWP undertakes throughout the City on a routine basis.

Topanga Tank Expansion — The description of the Topanga Tank Expansion alternative (Page 2-8) does not contain adequate information to permit an informed evaluation of this alternative. There is no description of the location of the expanded tank facilities, either at Topanga or at Kittridge; no description of the nature of the modifications to the water delivery system from this facility; no description of the role of the Kittridge Tanks, or how expansion and operation of the Topanga and Kittridge Tanks would address the purposes of the proposed project. The DEIR also does not explain why 1,250 feet of offsite piping for new inlets and outlets would need to be constructed under this alternative, or why and where 9500 feet of 16-inch piping would be installed. Significantly, the description of this alternative and of the proposed project do not make clear whether this new piping would also be required as part of, or as a result of, improvements in the Topanga tank service area following construction of the proposed project.

No Project Alternative — The DEIR indicates (Page 2-8) that the No Project alternative has been rejected on basis of City Charter requirement to provide

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MT – 14:

Construction of Water Tank at Tract 33454 – Since water tank service systems operate by gravity, in order for a tank at this site to provide adequate pressure, it would need to be located at an elevation 150 to 200 feet higher than the highest house. With the specified limitations (e.g., construction of the tank in the ‘bowl’ of Tract 33454), this alternative is not feasible. A new tank could, however be constructed along the ridge of Tract 33454. In addition, this alternative would require the construction of an additional pump station and would likely involve the enlargement of the existing Girard Pump Station and the replacement of the Girard inlet and outlet lines described in Alternative 3 of the EIR. This alternative, however, would only achieve a single objective, providing water service to Tract 33454.

MT – 15:

Construction/Expansion of the Existing 1240’ Water Pipeline – This alternative would be similar to the Ellenita/Wells/Canoga Alignment alternative. As previously indicated in response to MT-3, there is no connection from the Corbin Tank (1677-foot system) to the Topanga Tank (1337-foot system) through the Adele and Girard Pumping Stations. The discharge side of the Girard Pumping Station (1240-foot system) serves as the suction side of the Adele Pumping Station (1677-foot system) during emergencies. The Girard Pumping Station pumps water from 1123-foot system to the 1240- and 1337-foot systems. The Nogales and Adele Pumping Stations pump water from the 1240-foot system to the 1677-foot system. Again, as previously indicated, a new pipeline would need to be constructed to connect the 1677-foot system to the 1337-foot system, which is what the proposed project would accomplish. Because of the difference in hydraulic grades in service zones, it is not easy to cross service zones to utilize available water supplies. A pipeline may be placed in the 1240 service zone but cannot be utilized to transfer water from the 1677- to 1337- foot system. In addition, construction of new pipelines in roadways where existing substructures exist are generally more time consuming and costly.

MT – 16:

Improvements to the Existing DWP System – The comment requires further clarification. The proposed project would “defer the need for additional water storage facilities and the replacement of pipelines within the currently developed area”. In other words, construction of the proposed project would serve to meet the existing water demands of the service area. Should future demands of the service area exceed the capabilities of the proposed project, the facilities would merit reevaluation regarding the need for subsequent improvements. As previously indicated, there are no other foreseeable planned improvements to this area. With the installation of the proposed project, the replacement of the Girard Pump Station, inlet and outlet lines and other facilities would be deferred.

MT –17:

As indicated in Section 2.2.3, the new Kittridge Tank would hold 7.0 million gallons of water and would be located at the existing Kittridge Tank site. Section 2.2.3 further indicates that the 7.0-million gallon capacity is necessary to be equivalent to the 11 cfs emergency source that would be available from the proposed project or Alternatives 1 or 2. The 7.0-million gallon tank size is based on the equivalent amount of water that the proposed project could convey in a single day. For example, if it takes three to four days to fix a break in the trunkline, as in the Granada Trunk Line during the 1994 Northridge Earthquake, the amount of water conveyance capacity that could be provided by the proposed project, and requiring storage, would be 21 to 28 million gallons.

Expansion of the Kittridge Tank facility alone would achieve only one of the proposed project objectives. In order to achieve more than a single project objective, the Kittridge Tank expansion has

been included as an additional improvement that would be necessary as part of the Topanga Tank Alternative. A brief description of the biological conditions of the site is described in Section 4.1.3. In addition, although not geologically evaluated in Section 4.2, Section 4.2.3 provides an evaluation of the seismic conditions of the Kittridge site.

Tank facility by constructing one or more additional tanks at this existing facility. There is, however, no description of the size or configuration of this expansion, or of how this expansion would address the purposes of the project. Further, the DEIR admittedly contains no analysis of the geological or biological conditions at this site. This facility currently provides additional stored water to serve the West Valley area during interruptions of water supply through the Granada Trunk line. Expansion of the tank capacity at this location would provide still-greater redundancy in water supply. Because this site is already the location of storage facilities, and additional construction should have minimal environmental impact, the expansion of this facility should be considered as a stand-alone alternative to the proposed project.

MT-18

Ellenita/Wells/Canoga Alignment — The DEIR (Page 2-7) proposes routing the water pipeline through existing streets and neighborhoods along Ellenita, Wells, and Canoga Streets. The description of this alternative is inadequate in part because it does not recognize that DWP routinely excavates streets in routine pipeline construction projects. For instance, DWP recently completed a several months-long excavation of Mulholland Drive between Laurel Canyon and Beverly Glen (probably pursuant to a categorical exemption from CEQA and without an EIR). The description of this alternative also does not explain why this alternative would require the construction of a 20-inch, rather than a 16-inch, pipeline. The description also does not explain why the proposed pipeline cannot connect to the existing pipeline in Wells Avenue, thereby reducing the amount of trenching and limiting the environmental impact of this alternative. The description of this alternative should contain information sufficient to permit the public and decision makers to compare this project to the scope and number of other pipeline projects DWP undertakes throughout the City on a routine basis.

MT-19

Topanga Tank Expansion — The description of the Topanga Tank Expansion alternative (Page 2-8) does not contain adequate information to permit an informed evaluation of this alternative. There is no description of the location of the expanded tank facilities, either at Topanga or at Kittridge; no description of the nature of the modifications to the water delivery system from this facility; no description of the role of the Kittridge Tanks, or how expansion and operation of the Topanga and Kittridge-Tanks would address the purposes of the proposed project. The DEIR also does not explain why 1,250 feet of offsite piping for new inlets and outlets would need to be constructed under this alternative, or why and where 9500 feet of 16-inch piping would be installed. Significantly, the description of this alternative and of the proposed project do not make clear whether this new piping would also be required as part of, or as a result of, improvements in the Topanga tank service area following construction of the proposed project.

MT-20

No Project Alternative — The DEIR indicates (Page 2-8) that the No Project alternative has been rejected on basis of City Charter requirement to provide

MT-20

water to Tract 33454. This raises the question of whether the pending purchase of Tract 33454 by the Santa Monica Mountains Conservancy would remove this objection to this proposed alternative. It also raises the question of why DWP has taken six years to comply with this Charter requirement. Further, it appears that Tract No 33454 has access to water through the existing 12-inch water pipeline, which should satisfy the Charter requirement. Since the new 16-inch water line is intended to be used for emergencies, and the 12-inch line used for domestic use, it is not apparent how this project will change the water supply system serving Tract No. 33454.

Aesthetics. The DEIR asserts (Page 3-1) that the proposed project, including appurtenant structures, is consistent with the uses outlined in Section 5.A.5 of the Mulholland Scenic Parkway Specific Plan (Ordinance No. 167,943). Utility facilities are allowed in the Inner Corridor of the Mulholland Scenic Parkway. The DEIR, however, overlooks the prerequisite in Section 5.A.5 of the Specific Plan that "feasible alternate locations (for the utility facility) do not exist outside the inner corridor..." In this instance, feasible alternatives clearly exist in the Alternatives evaluated in the DEIR, and other alternatives proposed by various commenters. Consequently, the proposed project does not conform to the Mulholland Scenic Parkway Specific Plan, and must be concluded to have potentially significant impacts on the land use considerations and aesthetic resources of the Mulholland Scenic Parkway.

The Final EIR should address the presence of construction equipment, the erosion of the roadway from differential absorption, and the erosion around the maintenance valves, and the impacts of this equipment and activity on the ability of citizens to enjoy the scenic character of this portion of the Mulholland Scenic Parkway.

Cultural Resources. The DEIR states (Page 3-11), with regard to the proposal to nominate Dirt Mulholland to the National registry of Historic Places, that "the existing roadway will be restored to essentially its existing condition, and is not anticipated to influence the outcome of this nomination." Our conversations with individuals with experience in the nomination of roadways for historic designation (particularly Harrison Scott, the individual who succeeded in placing the Old Ridge Road in Los Angeles County on the Register) indicates that this statement is inaccurate. The National Registry apparently gives consideration to whether properties proposed for inclusion have been altered from their historical condition. The presence of a water pipeline beneath the roadbed of Mulholland Drive may, indeed, affect the nomination process. In any event, the accuracy of this assertion should be verified, not assumed.

Land Use. The Final EIR should discuss the impact and consistency of the proposed project on the "applicable environmental plans and policies" adopted by the Santa Monica Mountains Conservancy, the United States National Park Service, the California Department of Parks and Recreation, and the City of Los Angeles. The Final EIR should also discuss in what way the project will be compatible with the existing land use in the vicinity, since it is inconsistent with the Mulholland Scenic Parkway Specific

MT – 18:

The need to construct a 20-inch pipeline rather than a 16-inch pipeline for this alternative is in order to provide equivalent pressure as the proposed project due to hydraulic losses incurred from the greater distance traveled. The lines in Wells Avenue referenced in the comment provide water to the 1240-foot system. The proposed project would provide water from the 1677-foot system. It would be infeasible to connect these two systems. The existing 12-inch pipe, which would be inadequate to convey water over the required distance, would need to be upsized to 20-inch pipe.

The reference to “other pipeline projects” is unclear. Pursuant to CEQA, the environmental impacts from a proposed project are analyzed to determine its significance. The determination of significance is not based on the “routineness” of construction activities.

MT – 19:

As indicated in Sections 2.2.3, 4.1.3 and 4.2.1, construction of both a new Topanga Tank and Kittridge Tank would require modification and expansion of the current tank pads. These pads would need to be modified to accommodate a 0.8 million gallon tank to serve the 1337 system and a 7.0 million gallon tank to provide additional emergency water supply, respectively.

The 1,250 feet of new inlet/outlet pipe is needed to adequately fill the new Topanga Tank back up for use the next day. The 9,500 feet of 16-inch pipe would be installed in Ventura Boulevard, Billeboso Avenue, and Feliciano Drive. This pipe would be the new Girard Pumping Station inlet line. Increased flows to the pumping station require the existing inlet line with a new one.

MT – 20:

Tract 33454 was recently approved by the Los Angeles City Planning Department in June 2000. The LADWP is required by Charter to provide water to customers within the City of Los Angeles. Should Tract 33454 be acquired by the Santa Monica Mountains Conservancy, water service would no longer be needed by this tract. However, the other objectives of the proposed project described in Section 1.3 would still need to be met.

In addition, as described throughout the EIR, the proposed pipeline consists of two portions: 13,000 feet of new 16-inch steel pipeline and 2,200 feet of new 16-inch ductile iron pipeline. The 2,200 feet of 16-inch ductile iron pipeline is “replacement” pipeline that would parallel the existing 12-inch pipeline present between Picasso Avenue and Saltillo Street until the 12-inch line is abandoned. The 13,000 linear feet of steel pipeline between Greenbriar Drive and Saltillo Street is that portion serving the Topanga Tank service zone.

water to Tract 33454. This raises the question of whether the pending purchase of Tract 33454 by the Santa Monica Mountains Conservancy would remove this objection to this proposed alternative. It also raises the question of why DWP has taken six year to comply with this Charter requirement. Further, it appears that Tract No 33454 has access to water through the existing 12-inch water pipeline, which should satisfy the Charter requirement. Since the new 16-inch water line is intended to be used for emergencies, and the 12-inch line used for domestic use, it is not apparent how this project will change the water supply system serving Tract No. 33454.

MT-21

Aesthetics. The DEIR asserts (Page 3-1) that the proposed project, including appurtenant structures, is consistent with the uses outlined in Section 5.A.5 of the Mulholland Scenic Parkway Specific Plan (Ordinance No. 167,043). Utility facilities are allowed in the Inner Corridor of the Mulholland Scenic Parkway. The DEIR, however, overlooks the prerequisite in Section 5.A.5 of the Specific Plan that "feasible alternate locations (for the utility facility) do not exist outside the inner corridor..." In this instance, feasible alternatives clearly exist in the Alternatives evaluated in the DEIR, and other alternatives proposed by various commenters. Consequently, the proposed project does not conform to the Mulholland Scenic Parkway Specific Plan, and must be concluded to have potentially significant impacts on the land use considerations and aesthetic resources of the Mulholland Scenic Parkway.

The Final EIR should address the presence of construction equipment, the erosion of the roadway from differential absorption, and the erosion around the maintenance valves, and the impacts of this equipment and activity on the ability of citizens to enjoy the scenic character of this portion of the Mulholland Scenic Parkway.

MT-22

Cultural Resources. The DEIR states (Page 3-11), with regard to the proposal to nominate Dirt Mulholland to the National registry of Historic Places, that "the existing roadway will be restored to essentially its existing condition, and is not anticipated to influence the outcome of this nomination." Our conversations with individuals with experience in the nomination of roadways for historic designation (particularly Harrison Scott, the individual who succeeded in placing the Old Ridge Road in Los Angeles County on the Register) indicates that this statement is inaccurate. The National Registry apparently gives consideration to whether properties proposed for inclusion have been altered from their historical condition. The presence of a water pipeline beneath the roadbed of Mulholland Drive may, indeed, affect the nomination process. In any event, the accuracy of this assertion should be verified, not assumed.

MT-23

Land Use. The Final EIR should discuss the impact and consistency of the proposed project on the "applicable environmental plans and policies" adopted by the Santa Monica Mountains Conservancy, the United States National Park Service, the California Department of Parks and Recreation, and the City of Los Angeles. The Final EIR should also discuss in what way the project will be compatible with the existing land use in the vicinity, since it is inconsistent with the Mulholland Scenic Parkway Specific

MT-23

Plan and the planning efforts of the Santa Monica Mountains Conservancy, the United States National Park Service, the California Department of Parks and Recreation, and the City of Los Angeles. Because the project will make water service more readily available in an area that is currently undeveloped, the project has the potential to result in development that is inconsistent with the existing land use in the vicinity, which is primarily open space.

Hazards and Hazardous Materials. The DEIR states (Page 3-13) that combustible-fueled construction equipment used in the construction of the proposed water pipeline will pose an increased potential for fire. This is accurate. The DEIR, however, only identifies one scenario in which an accident could cause a fire — the slippage of a piece of construction equipment from the roadway. The DEIR assumes that the roadway will support their weight of equipment, ignoring the fact that Mulholland Drive in this section is a degraded, unpaved roadway that does not have the bearing capacity of a normal roadway. Further, the DEIR ignores other foreseeable accident scenarios that could lead to fire danger, such as smoking by construction workers or errant sparks from welding equipment. The discussion of hazards and hazardous material in the Final EIR should provide a more meaningful discussion of these issues.

The Final EIR should address the considerable vehicular activity required for hauling materials, excavating and hauling soil, and transporting cement and soil slurry entailed in this proposed project, including specifying where these materials, including fuels and welding gases, are to be stored, used, or disposed of. The Final EIR should evaluate the impacts and risks of the use and storage of these materials on the environment and other resources in the vicinity of the project.

The DEIR cites two oil pipelines that occupy the path of the proposed pipeline, but does not otherwise describe the location of these pipeline or how and where they in proximity to the proposed project, and particularly where excavation of the water pipeline trench might risk rupture of the pipelines. The explanation in the DEIR that DWP will confirm the location of the pipelines before construction is elemental, but does not adequately address accidental rupture or the foreseeable impacts of an accidental rupture on the environment of the Santa Monica Mountains in a manner that provides for informed discussion of this potential hazard.

Air Quality. The air quality analysis assumes that PM-10 emission reductions can be achieved by rerouting 18 vehicle trips per day of residential traffic away from Mulholland Drive and onto paved streets. This assumption is unsupported. First, if there are passenger vehicles using Dirt Mulholland as a primary access route, they can be counted — they do not need to be assumed (Table 3.3-9, 3-3.10). Second, the assumption that the residents nearest Dirt Mulholland currently use a rutted dirt road for daily primary access instead of a paved street, merely because it is closer, is not credible. Third, it is not clear that the assumptions made in the DEIR account for the fact that Dirt Mulholland is currently closed to traffic throughout much of its length, meaning that there is no passenger traffic to mitigate. Fourth, although credit is taken

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MT – 21:

Responses MT-10 through MT-16 explain why suggested alternatives were discounted and eliminated from further consideration.

Sections 3.1 and 3.11 acknowledge that the presence of construction equipment on site would have a short-term aesthetic and recreational impact; however, this temporary effect is considered insignificant. Maintenance covers and erosion related issues are addressed in responses to WHHO-7, WHHO-8 and CDPR-1.

MT – 22:

Construction of the pipeline under the proposed project is intended to follow the existing alignment of the existing roadway. No widening, recontouring, realigning, or any other modifications to the roadway are planned as part of the proposed project that would threaten or alter its present condition. The proposed project does not involve paving the roadway, which could be considered a significant change in the existing conditions. Such a change could potentially influence the nomination process.

MT – 23:

The proposed new pipeline would not be inconsistent or incompatible with the existing land use because no new development is proposed under the project. Potential land use impacts associated with future development would be evaluated as appropriate during the environmental review process for such development. Potential growth-inducing impacts of the project are discussed in Section 4.3 and in response to comment SMMC-5. To reiterate, the presence of a water pipeline, alone, is not the only major factor driving development. Other barriers to development (such as lack of sewers, power, gas, etc.) need also be considered. In addition, the SMMC is actively pursuing the acquisition of private land holdings for the purpose of maintaining the property as open space. Per the SMMC's *Mulholland Gateway Park Additions Project Plan (2000)*, a total of "873 acres of undeveloped land identified in this plan would be acquired in fee by a public park agency." One of the objectives of the plan is "to prioritize the first tier acquisitions necessary to ensure that no additional development or grading will occur within the "Inner Corridor" and "Outer Corridor" of 'Dirt' Mulholland Drive as defined by the Mulholland Scenic Parkway Specific Plan."

The plan identifies properties threatened by development such as the Avatar property owned by Mulholland Hills Associates and immediately adjacent to the roadway, the 21000 Mulholland Drive property owned by the EPAC Woodland Hills Partners LLC, also adjacent to the roadway, 33.5-acres in an unincorporated area within the Topanga Canyon watershed owned by Mulholland Associates II, a one-acre lot to the east of Corbin water tank, and a 5.4-acre property adjacent to the city park (Caplow). The feasibility of such acquisition efforts are foreseeable in that some owners have expressed willingness to sell their property, namely Mulholland Hills Associates and Mulholland Associates II. The 21000 Mulholland Drive property owners have already been granted their grading permits. The SMCC is actively pursuing Proposition 12 funding to purchase the property, the status of negotiations of which is not known. As per the report, the development potential of the one-acre parcel is not substantial nor is the 5.4-acre site a priority (SMMC 2000).

Plan and the planning efforts of the Santa Monica Mountains Conservancy, the United States National Park Service, the California Department of Parks and Recreation, and the City of Los Angeles. Because the project will make water service more readily available in an area that is currently undeveloped, the project has the potential to result in development that is inconsistent with the existing land use in the vicinity, which is primarily open space.

MT-24 Hazards and Hazardous Materials. The DEIR states (Page 3-13) that combustible-fueled construction equipment used in the construction of the proposed water pipeline will pose an increased potential for fire. This is accurate. The DEIR, however, only identifies one scenario in which an accident could cause a fire — the slippage of a piece of construction equipment from the roadway. The DEIR assumes that the roadway will support their weight of equipment, ignoring the fact that Mulholland Drive in this section is a degraded, unpaved roadway that does not have the bearing capacity of a normal roadway. Further, the DEIR ignores other foreseeable accident scenarios that could lead to fire danger, such as smoking by construction workers or errant sparks from welding equipment. The discussion of hazards and hazardous material in the Final EIR should provide a more meaningful discussion of these issues.

MT-25 The Final EIR should address the considerable vehicular activity required for hauling materials, excavating and hauling soil, and transporting cement and soil slurry entailed in this proposed project, including specifying where these materials, including fuels and welding gases, are to be stored, used, or disposed of. The Final EIR should evaluate the impacts and risks of the use and storage of these materials on the environment and other resources in the vicinity of the project.

MT-26 The DEIR cites two oil pipelines that occupy the path of the proposed pipeline, but does not otherwise describe the location of these pipeline or how and where they in proximity to the proposed project, and particularly where excavation of the water pipeline trench might risk rupture of the pipelines. The explanation in the DEIR that DWP will confirm the location of the pipelines before construction is elemental, but does not adequately address accidental rupture or the foreseeable impacts of an accidental rupture on the environment of the Santa Monica Mountains in a manner that provides for informed discussion of this potential hazard.

MT-27 Air Quality. The air quality analysis assumes that PM-10 emission reductions can be achieved by rerouting 16 vehicle trips per day of residential traffic away from Mulholland Drive and onto paved streets. This assumption is unsupported. First, if there are passenger vehicles using Dirt Mulholland as a primary access route, they can be counted — they do not need to be assumed (Table 3.3-9, 3-3.10). Second, the assumption that the residents nearest Dirt Mulholland currently use a rutted dirt road for daily primary access instead of a paved street, merely because it is closer, is not credible. Third, it is not clear that the assumptions made in the DEIR account for the fact that Dirt Mulholland is currently closed to traffic throughout much of its length, meaning that there is no passenger traffic to mitigate. Fourth, although credit is taken

MT-27

for rerouting traffic in Table 3.3-10, this is not listed as a mitigation measure in Section 3.3.1 of the DEIR. Since the PM-10 emission reduction claimed for the rerouting of this traffic is essential to the DEIR's claim that PM-10 emissions will not be significant, and since a minimal change in the assumptions (e.g., from 16 vehicles to 14 vehicles) produces a significantly different result, these assumptions should be scrutinized and documented more carefully.

The air quality analysis further assumes (Table 3.3-7) that PM-10 emission reduction can be gained by watering down the unpaved roadways three times per day. The evaluation of this mitigation measure should include a description of the manner in which the roadway would be watered, the amount of water used, and the effectiveness of this measure in controlling dust in various weather conditions (e.g., how effective will this measure be when the Santa Ana winds are blowing, or when the temperature is approaching 100 degrees F?). The potential direct and indirect environmental effects of the daily application of water to a dry dirt roadway on the structure and biota of the roadway should be examined pursuant to CEQA.

The air quality analysis also cites (Table 3.3-7) the washing of truck wheel wells as a mitigation measure for PM-10 emissions, but states that this measure will be taken only after the truck has left the unpaved roadway for the paved roadway. This raises the question of whether the most substantial part of the PM-10 emissions from truck wheel wells will not have already occurred along the two-mile trip prior to washing, diminishing the effect of this measure.

Tables 3.3-6 and 3.3-7 of the DEIR indicate that construction materials will be stored as part of this project, but the DEIR does not indicate where these materials are to be stored, used, or disposed of. These activities will have an environmental impact, whether they take place at the project site or a remote storage area, but this impact is not discussed. Table 3.3-7 of the DEIR also indicates that truck wheel wells will be washed, but not where or how much water use is anticipated, and how the wash water disposal will be handled. The process and impacts of this washing activity should be described and evaluated.

The Final EIR should also explain why the emission values in Table 3.3-7 are different from the values in Table 4 in the Draft Negative Declaration and Initial Study for this project (June 12, 2000). For instance, in Table 3.3-7 of the DEIR, the driving distance for passenger vehicles from the DWP West Valley District Center is stated as 90 VMT/day, where in the Initial Study, that same distance was stated as 90 VMT/day. Assuming that the DWP West Valley District Center did not move closer to the proposed project site, this revision deserves explanation. Further, the field inspection vehicles listed on Table 4 of the Initial Study are not included in the DEIR Table 3.3-7. The emission rate for trucks hauling dirt is listed as 1 lb./mi. in the DEIR, but 9.3 lbs/mile. Since both of these tables cite Tables A9-9 and A11-9-A of the SCAQMD CEQA Handbook as their source, it is puzzling why they would be different. This discrepancy should be explained in the Final EIR.

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MT – 24:

The comment does not provide sufficient information regarding the bearing capacity of the road nor the road's inability to support construction related equipment. The roadway has demonstrated its ability to support the weight of construction equipment both for the installation of the existing gas pipelines and the routine roadway grading activities. Similar equipment would be utilized for the construction of the proposed water pipeline.

The potential fire hazard danger from errant sparks would be mitigated to below a level of significance by the following measure:

HA – 1: Potential fire hazards associated with construction activities would be minimized by the clearing of loose brush and non-native vegetation immediately surrounding active welding sites. Wherever feasible, protective shields shall be erected around such sites. In addition, all construction personnel shall be prohibited from smoking on-site.

MT – 25:

No fuel would be stored at the project site. The vehicular activities associated with the construction of the proposed project are considered in Section 3.3 Air Quality. Risks associated with the use and storage of fuels were considered in the Initial Study and were found to be insignificant.

MT – 26:

In response to the comment regarding the potential for an accidental spill and/or rupture of the gas pipeline within 'Dirt' Mulholland Drive during construction activities, the following mitigation measures shall be implemented (see Section 3.5.3):

HA – 2: Prior to construction, an Emergency Response Plan addressing accidental spills and/or gas pipeline ruptures shall be prepared.

HA – 3: Prior to construction, the present owners of the existing gas pipeline shall be consulted.

MT – 27:

For purposes of the air quality analysis, reasonable assumptions were used to estimate the amount of air pollution resulting from the proposed project during construction activities. As stated in Section 3.12, Mulholland Drive "between Santa Maria Road and Greenbriar Drive [the road] is currently gated and closed to public thru-traffic." That portion between Picasso and Santa Maria is open to vehicle traffic. Vehicle traffic was observed accessing and egressing Mulholland Drive via Santa Maria Road during periodic site visits. In addition, in a comment letter from Fair Hills Farms, located along Santa Maria Road, it was specifically indicated that Mulholland Drive is relied on entirely for ingress and egress of their horse trailers as well as for supplies that are delivered by semi-truck. This comment in addition to field observations formed the basis of the assumptions presented in the EIR.

The comment regarding unidentified mitigation measures for rerouting traffic as stated in Table 3.3-10 is noted. The following is an additional and recommended mitigation measure that has been added to Section 3.3.1:

AIR – 6: During construction activities at the westerly terminus of the proposed pipeline alignment, local residential traffic utilizing the unpaved portion of Mulholland Drive

shall be diverted onto paved streets. The recommended route shall be clearly marked and posted along Topanga Canyon Boulevard, Dumetz Road, Canoga Avenue, and other residential streets.

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for rerouting traffic in Table 3.3-10, this is not listed as a mitigation measure in Section 3.3.1 of the DEIR. Since the PM-10 emission reduction claimed for the rerouting of this traffic is essential to the DEIR's claim that PM-10 emissions will not be significant, and since a minimal change in the assumptions (e.g., from 16 vehicles to 14 vehicles) produces a significantly different result, these assumptions should be scrutinized and documented more carefully.

MT-28

The air quality analysis further assumes (Table 3.3-7) that PM-10 emission reduction can be gained by watering down the unpaved roadways three times per day. The evaluation of this mitigation measure should include a description of the manner in which the roadway would be watered, the amount of water used, and the effectiveness of this measure in controlling dust in various weather conditions (e.g., how effective will this measure be when the Santa Ana winds are blowing, or when the temperature is approaching 100 degrees F?). The potential direct and indirect environmental effects of the daily application of water to a dry dirt roadway on the structure and biota of the roadway should be examined pursuant to CEQA.

MT-29

The air quality analysis also cites (Table 3.3-7) the washing of truck wheel wells as a mitigation measure for PM-10 emissions, but states that this measure will be taken only after the truck has left the unpaved roadway for the paved roadway. This raises the question of whether the most substantial part of the PM-10 emissions from truck wheel wells will not have already occurred along the two-mile trip prior to washing, diminishing the effect of this measure.

MT-30

Tables 3.3-6 and 3.3-7 of the DEIR indicate that construction materials will be stored as part of this project, but the DEIR does not indicate where these materials are to be stored, used, or disposed of. These activities will have an environmental impact, whether they take place at the project site or a remote storage area, but this impact is not discussed. Table 3.3-7 of the DEIR also indicates that truck wheel wells will be washed, but not where or how much water use is anticipated, and how the wash water disposal will be handled. The process and impacts of this washing activity should be described and evaluated.

MT-31

The Final EIR should also explain why the emission values in Table 3.3-7 are different from the values in Table 4 in the Draft Negative Declaration and Initial Study for this project (June 12, 2000). For instance, in Table 3.3-7 of the DEIR, the driving distance for passenger vehicles from the DWP West Valley District Center is stated as 90 VMT/day, where in the Initial Study, that same distance was stated as 90 VMT/day. Assuming that the DWP West Valley District Center did not move closer to the proposed project site, this revision deserves explanation. Further, the field inspection vehicles listed on Table 4 of the Initial Study are not included in the DEIR Table 3.3-7. The emission rate for trucks hauling dirt is listed as 1 lb./mi. in the DEIR, but 9.3 lbs/mile. Since both of these tables cite Tables A9-9 and A11-9-A of the SCAQMD CEQA Handbook as their sources, it is puzzling why they would be different. This discrepancy should be explained in the Final EIR.

MT – 28:

Mitigation measure AIR – 3 (see Section 3.3.1) has been revised to read:

AIR – 3: The active construction site being excavated and unpaved roads utilized by construction equipment and equipment hauling trucks shall be watered at a frequency sufficient to manage potential dust from surface disturbance. The water truck is assumed to have a standard capacity of about 2,400 gallons. In addition, on excessively windy days (i.e., when wind speed is greater than 25 miles per hour), active construction and road use areas shall be watered on an as needed basis so as to maintain a surface crust for preventing the emission of visible dust. To ensure proper application of water as a dust suppressant, an air quality management plan will be prepared that specifically addresses conditions under which water shall be applied and the limits of its use so as to protect the roadway and adjacent biota and to maintain air quality conditions.

MT – 29:

As indicated in Section 3.3, it is the implementation of the mitigation measures recommended in Table 3.3-7 in conjunction with the secondary benefit of vehicles routed away from 'Dirt' Mulholland that would result in net fugitive dust emissions within SCAQMD thresholds.

MT – 30:

Comment noted. The preferred location for staging and materials storage would be in the immediate vicinity of construction activities. In the event that an adequate site cannot be located, Section 3.3 conservatively assumes that materials would be stored and transported from the West Valley District Yard.

The washing of truck wheel wells is an SCAQMD-recommended mitigation measure to control fugitive dust. It is estimated that up to 300 gallons per day of water would be used for wheel-washing activities. The location of washing would be prior to entering onto paved roads, e.g., Saltillo Street. Disposal of wash water is not anticipated due to the low quantity of water anticipated and the nature of the materials (i.e., uncontaminated soil) being washed off. If wash water is to be discharged into the storm drain system, this activity would comply with regulations governing such activity.

MT – 31:

Comment acknowledged. Since the preparation of the Draft Negative Declaration and Initial Study for the proposed project (June 12, 2000), the proposed project and construction activities have been further refined, in part due to comments received and additional technical information. The Draft Negative Declaration assumed a one-way travel distance of 10 miles from the Valley District Center to the project site, resulting in the 120 VMT. Since that time, it was determined that 7.5 miles (reflected in the EIR) is more realistic, resulting in the 90 VMT. Field inspection vehicles were not included in the EIR because they were considered to be redundant as a construction supervisor and sufficient vehicles suitable for inspection would be onsite during construction activities. As referenced in Table 3.3-7 of the EIR, a newer, more accurate emission factor from the SCAQMD (2001), specific to dirt hauling, was utilized.

Public Services. The DEIR notes (Page 3-16, 3-17) that the 1985 Environmental Impact Report for the Mulholland Scenic Parkway Specific Plan found that fire response along Dirt Mulholland was inadequate in terms of response times and access. Although it is doubtful that this observation is meaningful in view of the absence of development along this stretch of Mulholland Drive, this project will not affect response times, and consequently this statement is irrelevant to this EIR.

MT-32

The discussion of fire protection issues in the DEIR is contradictory, inaccurate, and incomprehensible. First, the DEIR states that the improvement of fire protection and the installation of fire hydrants are not a part of the proposed project (Page No. 2-2). However, throughout the DEIR, it is asserted that the construction of the water pipeline, and the installation of fire hydrants and other fire protection measures made possible by the pipeline, are an objective of the proposed project (Page No. 1-3), and a critical distinction between the proposed project and the Alternatives (Page No. 2-1, 209). If fire hydrants are not a part of the current or anticipated scope of the proposed project, they should be deleted from the DEIR. If fire hydrants are part of the current or anticipated scope of the project, they should be fully evaluated in the DEIR. In its current form, the DEIR refuses to evaluate the impacts of fire protection devices, but uses their presence or possibility as a main argument in support of the proposed project.

MT-33

Second, the DEIR states (Page No. 3-14) that the Specific Plan "calls for the installation of fire hydrants along 'Dirt' Mulholland as mitigation to address the potential for increased fire hazards resulting from implementation of the Plan." The Specific Plan contains no reference to the installation of fire hydrants along "Dirt" Mulholland or anywhere else along the Mulholland Scenic Corridor.

MT-34

Third, the DEIR states repeatedly that the proposed project is consistent with the discussion of fire protection in the Environmental Impact Report for the Specific Plan. This is clearly a misreading of that document. The Fire Department's concern was that increased development and increased recreational usage would increase the fire danger all along Mulholland Drive, and particularly along Dirt Mulholland. There is no evidence - certainly not in this DEIR - that the Specific Plan has resulted in increased recreational use of Dirt Mulholland, or that there has been an increase in the incidence of fire resulting from that use. Moreover, there certainly has not been an increase in development along Dirt Mulholland. To the contrary, the acquisition of property adjacent to Dirt Mulholland by public agencies has effectively eliminated development that might have been foreseen when the Mulholland EIR was prepared in 1985. This change in relevant conditions has made the Mulholland EIR a questionable authority for the proposition that water mains and fire hydrants are needed or desired along Dirt Mulholland.

MT-35

Fourth, the specific mitigation measure called for in the Mulholland EIR calls for water mains and fire hydrants to be installed along Dirt Mulholland "concurrent with development." Since there has been no significant development, and little likelihood

MT-35 that there will be such development in the future, this mitigation measure is inapplicable to this proposed project.

Fifth, the DEIR does not include consideration of the role of fire in maintaining the chaparral ecosystem in the vicinity of the proposed project, and the impact on these biological resources of the proposed project when used as a fire suppression system.

Finally, there has been no analysis of whether water mains and hydrants are a preferred or even reasonable means of providing fire protection to open space in this area. It is questionable whether fire protection in this area should rely on vehicles that must negotiate a single winding, narrow, unpaved road in the middle of a fire area to get to fire hydrants. Such a strategy would expose both the open space and the fire fighters to unnecessary danger. It would be more reasonable for fire protection in this area to rely instead on aircraft carrying water and fire retardant from areas outside of the fire zone, as has been the practice in recent years.

Recreation. The DEIR states that the proposed project would facilitate recreation along Dirt Mulholland by "enhancing the ability of the City to provide drinking fountains as per the Mulholland Scenic Parkway Specific Plan." The Specific Plan does not call for the installation of drinking fountains along the Scenic Parkway. If this project contemplates the installation of drinking water fountains, the environmental impacts of those facilities and their effect on increasing recreational use should be addressed.

Biological Resources — Kittridge Tanks. Alternatives analysis in the DEIR does not include a biological survey of Kittridge area, and therefore is incomplete. Because there was no study, there is no evidence to support the conclusion that this alternative will result in greater impacts than the proposed project. The same mitigation measures proposed for the proposed water pipeline could also mitigate any impacts of construction at the Kittridge Tanks.

Biological Resources — Alternatives Analysis. It is not surprising that the DEIR concludes that the Mulholland Gateway Park alternative will result in significant impacts. If you undertake a major construction project through an undeveloped park, that would be expected. It is not a credible conclusion, however, that excavation of a pipeline in paved roadways through existing developed areas (the Ellenita/Wells/Canoga Alignment) will have impacts that are "similar" to the excavation of a pipeline through an undeveloped open area adjacent to, or through, parklands. Further, the impacts of construction of the Ellenita/Wells/Canoga Alignment on biological resources would not be significantly different from the impacts of the numerous water pipeline construction projects DWP constructs in streets throughout the City. *

Biological Resources — Wildlife Habitat and Movement. The Final EIR should discuss the potential for disruption of wildlife habitat and movement throughout the length of the proposed construction site during these activities. The presence of

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MT – 32:

Comment noted. The statement referenced from Section 3.10 of the EIR was intended to provide some background of the existing public service conditions in the proposed project area. The comment is correct in that the proposed project would have little effect on LAFD response times along Mulholland Drive between Topanga Canyon Boulevard and Mandeville Canyon Road.

The latter part of the comment refers to the fire protection aspects of the proposed project. The following clarification is provided. While it is true that no new fire hydrants are proposed, the proposed project would provide improved fire protection to existing developed areas. In addition to providing a redundancy feature to the water system, the proposed project would provide a supplemental source of water to the 1337 elevation service zone, whereby pressures in the existing developed service area would be improved. In that fire hydrants already exist in these developed areas, and are connected to the same water system, they too would experience an improvement in pressures. See also response to MT—7.

MT – 33:

Comment acknowledged. See also response to MT-2.

MT – 34:

Comment noted. As previously indicated, installation of fire hydrants is not an objective of the proposed project. Construction of the proposed project would merely provide the ability to install fire hydrants along 'Dirt' Mulholland. Please refer to Section 1.3, which identifies the purpose and need for the proposed project.

MT – 35:

Please refer to responses MT-32 and MT-34. Development of Tract 33454, which would be served by the proposed project, would require fire protection. Thus, the proposed project (a new water main), would provide the ability to install new fire hydrants, and would be built concurrent with development. Construction of the pipeline would comply with the recommended mitigation measures identified in the EIR for the Tract 33454 development.

that there will be such development in the future, this mitigation measure is inapplicable to this proposed project.

MT-36 Fifth, the DEIR does not include consideration of the role of fire in maintaining the chaparral ecosystem in the vicinity of the proposed project, and the impact on these biological resources of the proposed project when used as a fire suppression system.

MT-37 Finally, there has been no analysis of whether water mains and hydrants are a preferred or even reasonable means of providing fire protection to open space in this area. It is questionable whether fire protection in this area should rely on vehicles that must negotiate a single winding, narrow, unpaved road in the middle of a fire area to get to fire hydrants. Such a strategy would expose both the open space and the fire fighters to unnecessary danger. It would be more reasonable for fire protection in this area to rely instead on aircraft carrying water and fire retardant from areas outside of the fire zone, as has been the practice in recent years.

MT-38 **Recreation.** The DEIR states that the proposed project would facilitate recreation along Dirt Mulholland by "enhancing the ability of the City to provide drinking fountains as per the Mulholland Scenic Parkway Specific Plan." The Specific Plan does not call for the installation of drinking fountains along the Scenic Parkway. If this project contemplates the installation of drinking water fountains, the environmental impacts of those facilities and their effect on increasing recreational use should be addressed.

MT-39 **Biological Resources — Kittridge Tanks.** Alternatives analysis in the DEIR does not include a biological survey of Kittridge area, and therefore is incomplete. Because there was no study, there is no evidence to support the conclusion that this alternative will result in greater impacts than the proposed project. The same mitigation measures proposed for the proposed water pipeline could also mitigate any impacts of construction at the Kittridge Tanks.

MT-40 **Biological Resources — Alternatives Analysis.** It is not surprising that the DEIR concludes that the Mulholland Gateway Park alternative will result in significant impacts. If you undertake a major construction project through an undeveloped park, that would be expected. It is not a credible conclusion, however, that excavation of a pipeline in paved roadways through existing developed areas (the Ellenita/Wells/Canoga Alignment) will have impacts that are "similar" to the excavation of a pipeline through an undeveloped open area adjacent to, or through, parklands. Further, the impacts of construction of the Ellenita/Wells/Canoga Alignment on biological resources would not be significantly different from the impacts of the numerous water pipeline construction projects DWP constructs in streets throughout the City.

MT-41 **Biological Resources — Wildlife Habitat and Movement.** The Final EIR should discuss the potential for disruption of wildlife habitat and movement throughout the length of the proposed construction site during these activities. The presence of

MT-41

men and machinery, the excavation of the roadbed, and the storage of equipment and materials will alter the patterns of wildlife activity and movement in the parklands and open lands abutting the roadway and elsewhere in the vicinity. The Final EIR should analyze, characterize and quantify these impacts.

Biological Resources — Sensitive Species. The Final EIR should include the results of a study of both rare and sensitive plants and animals in the vicinity of the proposed project. In particular, the study should focus on Federally designated species of concern, including the San Diego Mountain King Snake and the San Diego Coast Horned Lizard, as well as other designated species found in the Santa Monica Mountains.

Biological Resources — Siltation. The DEIR also states that the construction of the proposed project will be suspended during rainy periods, but does not evaluate the potential impacts on either the stability of soils and the roadbed, or on the biota of the area of leaving a construction site untended during these periods of typically heavy rainfall. Rainfall in the Santa Monica Mountains can be intense, and Dirt Mulholland is known to produce muddy, silt-laden runoff and dirt slides during these episodes. Leaving a construction trench incomplete and dirt piles covered with plastic during these rainfall events creates a serious potential for silting adjacent land and waterways, including vernal pools. The geological and biological effects of suspending construction during periods of high rainfall should be examined in the Final EIR.

Excavation and Storage. The DEIR states that over 7,500 cubic yards of dirt will be removed from the proposed project site for disposal off-site. The Final EIR should describe the proposed method and location of disposal of this dirt, and any indirect environmental impacts of this disposal.

Geological Stability. To enable the public and decision makers to evaluate the geological risks associated with the construction and operation of the proposed project, the Final EIR should include more details on the design of the proposed project, such as the location of the proposed excavation and the design criteria for curves and grade changes in the roadbed. The Final EIR should also address the Department's proposal to install maintenance hole access covers in the embankment adjacent to the roadway. The soil surrounding these structures will be subject to erosion, which will weaken the structure of the roadway and the geological stability of the hillside, and cause deterioration in water quality and wildlife habitat. Further, if the roadway is left unpaved, the compaction of the earth overlying the proposed pipeline will create a significant potential for differential absorption rates between the project site and the adjacent unpaved roadway. This differential could increase runoff and erosion of the roadway and hillside.

Leak and Line Failure. On March 1, 1994, the Los Angeles Times reported that 800,000 gallons of water leaked from the Corbin Tank. In the article, a DWP official

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MT – 36:

Please refer to response to MT-34. The issue of fire protection and public safety are addressed in the Safety Element of the City of Los Angeles General Plan, and are beyond the scope of this EIR.

MT - 37:

Comment noted. As previously indicated, fire hydrants are not a component of the proposed project.

MT – 38:

The proposed project does not contemplate the installation of drinking water fountains as part of the project.

MT – 39:

As indicated in Appendix E, “no surveys were performed along any of the alternative locations; however, these proposed sites were generally assessed based on low level aerial photographs, observation from Mulholland Drive, and other available information.” As stated in Appendix E, “The expansion would require the removal of a mixed community of Coastal Sage Scrub and Chaparral.” The proposed project would be located within the existing roadway, an already disturbed area. Should Alternative 3 be selected, a biological survey would be conducted of the site prior to development.

MT – 40:

Comment noted. The biological environments associated with Alternative 2 and the proposed project are different, resulting in differing levels of impact. However, construction activities associated with both scenarios would be similar in that they would occur within existing roadways. In addition, although surrounded by relatively disturbed vegetation, oaks and numerous other tree species are present along the Alternative 2 alignment, which support birds and other fauna that would be subject to disturbance by construction activities. See also response to MT-18.

MT – 41:

Comment noted. Construction activities are considered short-term and temporary in nature. Daily active construction activities would temporarily ward-off most wildlife from the immediate area, thereby protecting them from harm. However, as the construction site progresses and moves forward along a linear path, previously affected areas within the roadway would revert back to current conditions. Any potential impacts to wildlife species would be avoided and/or minimized to the maximum extent practicable by the implementation of the proposed mitigation measures as described in the EIR. In addition, standard construction practices for open trench activities would be adhered to. Some standard practices involve the covering and/or in-filling of excavated and open trenches at the end of each work day so as to avoid the possibility of trapping wildlife or persons in an open pit. Though wildlife (i.e., coyotes, bobcat, mountain lions) may utilize the roadway, these animals are primarily nocturnal and travel by night. Impacts to wildlife and their migration patterns from construction activities is not considered significant since construction would only occur during the daytime. Wildlife movement would not be hindered by the project upon implementation of the project since the pipeline is a subsurface facility. Any modifications or alterations in wildlife patterns from construction of the proposed project would be temporary and not considered to be significant.

men and machinery, the excavation of the roadbed, and the storage of equipment and materials will alter the patterns of wildlife activity and movement in the parklands and open lands abutting the roadway and elsewhere in the vicinity. The Final EIR should analyze, characterize and quantify these impacts.

MT-42

Biological Resources — Sensitive Species. The Final EIR should include the results of a study of both rare and sensitive plants and animals in the vicinity of the proposed project. In particular, the study should focus on Federally designated species of concern, including the San Diego Mountain King Snake and the San Diego Coast Horned Lizard, as well as other designated species found in the Santa Monica Mountains.

MT-43

Biological Resources — Siltation. The DEIR also states that the construction of the proposed project will be suspended during rainy periods, but does not evaluate the potential impacts on either the stability of soils and the roadbed, or on the biota of the area of leaving a construction site untended during these periods of typically heavy rainfall. Rainfall in the Santa Monica Mountains can be intense, and Dirt Mulholland is known to produce muddy, silt-laden runoff and dirt slides during these episodes. Leaving a construction trench incomplete and dirt piles covered with plastic during these rainfall events creates a serious potential for silting adjacent land and waterways, including vernal pools. The geological and biological effects of suspending construction during periods of high rainfall should be examined in the Final EIR.

MT-44

Excavation and Storage. The DEIR states that over 7,500 cubic yards of dirt will be removed from the proposed project site for disposal off-site. The Final EIR should describe the proposed method and location of disposal of this dirt, and any indirect environmental impacts of this disposal.

MT-45

Geological Stability. To enable the public and decision makers to evaluate the geological risks associated with the construction and operation of the proposed project, the Final EIR should include more details on the design of the proposed project, such as the location of the proposed excavation and the design criteria for curves and grade changes in the roadbed. The Final EIR should also address the Department's proposal to install maintenance hole access covers in the embankment adjacent to the roadway. The soil surrounding these structures will be subject to erosion, which will weaken the structure of the roadway and the geological stability of the hillside, and cause deterioration in water quality and wildlife habitat. Further, if the roadway is left unpaved, the compaction of the earth overlying the proposed pipeline will create a significant potential for differential absorption rates between the project site and the adjacent unpaved roadway. This differential could increase runoff and erosion of the roadway and hillside.

MT-46

Leak and Line Failure. On March 1, 1994, the Los Angeles Times reported that 800,000 gallons of water leaked from the Corbin Tank. In the article, a DWP official

MT-46

was quoted as stating that the leak was the result of the January, 1984, earthquake. This incident raises concerns that the proposed project, as well as the Corbin, Topanga, and Kittridge Tanks, are susceptible to similar seismic events. This concern is enhanced as to the proposed project because the pipeline will be buried in an inaccessible area, and could leak for a considerable time before being detected. The Final EIR should address the likelihood that any leak or failure in the proposed pipeline would go undetected (as has happened in the past). Such undetected leaks could destabilize the roadway and adjacent hillsides through soil saturation, and endanger water supplies to neighborhoods served by the proposed project.

Growth Inducement/Population and Housing. The DEIR limits the analysis of the impacts of the project on growth inducement, population, and housing to the area of undeveloped land adjacent to Dirt Mulholland. This approach is near-sighted and unrealistic. Water in this pipeline will be used by current and future development throughout the West San Fernando Valley, not just in the undeveloped area. The DEIR must consider the impact of this additional or "redundant" supply of water on development decisions throughout the area to be served by this project, which is not the area where the project is located.

Further, the DEIR limits the analysis of population growth to whether population projections made in the City's community plans that cover the area where the proposed project is to be located would be exceeded (Page No. 4-21). This approach is nonsensical. Right now, there is no population living adjacent to Dirt Mulholland for the greatest part of its length. Any increase in population in the tracts adjacent to Dirt Mulholland — including Tract 33454 — resulting from the creation of a water supply by this proposed project will be a growth impact of this project. If the DWP is to consider growth projections, they should include in the Final EIR any projections of population growth made by DWP itself as part of its water service planning activities.

The impacts of the proposed project on growth inducement, population growth and housing should be considered in four ways: (1) the effect of the proposed project in inducing development on tracts adjacent to, or in close proximity to, the proposed water pipeline in an area that is currently undeveloped open space; (2) the effect of the proposed project in inducing growth in the vicinity of the proposed pipeline through development of water supply, an increase in water pressure, the provision of redundancy in supply, and so forth, especially Tract No. 33454, the Girard Tract, and areas considered underserved by Topanga Tank system; (3) the effect of the proposed project in inducing growth in areas throughout the West Valley that will be receiving water from this system; and (4) the impact of the proposed project on areas of the West Valley where water service may be enhanced by the elimination of water demand from the project service area.

Further, the Final EIR should consider the potential growth inducement impact of the proposed water pipeline on areas in Los Angeles County adjacent to the area to be served by the proposed water pipeline, which are currently subject to water supply

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MT – 42:

A supplemental survey was conducted on June 4, 2001 to identify rare and sensitive plant species in the vicinity of the project. No federally designated species of concern were observed. According to the National Park Service, mountain lion sightings in the Santa Monica Mountains occur well north of the project site. However, according to local area residents responding to this EIR, mountain lions have been sighted in the vicinity of the project area. The proposed project would have an insignificant impact on this species for the reasons stated in response WHHO – 17 and MT – 41.

MT – 43:

Comment noted. Although not specifically discussed in Sections 4.1 and 4.2 of the EIR, as indicated in Section 2.1.4 of the EIR, construction activities not completed by the close of each work day would be secured by fencing off open excavations or covering them with steel plates to ensure public safety. This measure would further minimize the potential impacts to erosion and to animals that may potentially enter into open excavations. In addition, to further minimize any potential impacts to erosion, the following mitigation measure is provided in Section 4.2.4 of the EIR to further ensure that erosion and siltation is minimized to the maximum extent feasible when construction is halted during heavy rainfall periods.

GEO – 5: Erosion: During the rainy season the length of excavation and trenching will be minimized to allow for quick and immediate construction of a protective cover over the open trench or for backfilling.

MT – 44:

As described in Section 3.13 of the EIR, if a secondary use for excavated soils and asphalt cannot be found, the nearest landfill site most likely to receive the construction debris is the Calabazas Landfill. A secondary use location (e.g., concurrent development project in need of fill dirt, or an asphalt recycling facility capable of accepting additional material) would not be identified until the proposed project is scheduled for construction. If the material is found to be unsuitable for reuse, then it would be disposed of at a landfill. For the purposes of the EIR, the reuse/disposal locations were estimated to be up to 15 miles away. This estimate (presented in Table 3.3-6) was then used to analyze the environmental impacts associated with this activity (e.g., traffic, air quality).

MT – 45:

A geological assessment of the proposed project site has been included in Appendix F of the EIR, which provides a discussion of the geologic conditions of the site and recommendations for project design and construction. In addition, as stated in Section 2.1 of the EIR, “the proposed project would be designed, constructed, and operated in accordance with all applicable laws, regulations and formally adopted City standards. Construction would adhere to uniform practices established by the Southern California Chapter of the American Public Works Association (e.g., Standard Specifications for Public Works Construction) as specifically adopted by the City of Los Angeles.” See also responses to WHHO-7 and WHHO-8.

As indicated in Section 4.2.2 of the EIR, “should maintenance hole access covers be installed within the dirt portion of the roadway, the potential for soil erosion and/or differential erosion may occur around the perimeter of the cover during a storm even depending on the directional flow of water in the roadway. Such an affect would be relatively small in scale and would not negatively impact the overall site conditions.” See also Response to WHHO-25.

MT – 46:

Comment noted. As indicated in Section 4.2.2 of the EIR, the proposed project may increase the potential for landslides in the event of a pipeline rupture during a seismic event and the subsequent release of water. The release of water from a rupture can be minimized by the installation of shut-off valves, which is planned under the proposed project. Section 3.5.1 has been revised to describe the method by which leaks are detected. Consequently, should there be a leak or rupture in the pipe, the source of water may be shut-off until repairs can be made. As a result, this potential impact is not considered to be significant.

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was quoted as stating that the leak was the result of the January, 1984, earthquake. This incident raises concerns that the proposed project, as well as the Corbin, Topanga, and Kittridge Tanks, are susceptible to similar seismic events. This concern is enhanced as to the proposed project because the pipeline will be buried in an inaccessible area, and could leak for a considerable time before being detected. The Final EIR should address the likelihood that any leak or failure in the proposed pipeline would go undetected (as has happened in the past). Such undetected leaks could destabilize the roadway and adjacent hillsides through soil saturation, and endanger water supplies to neighborhoods served by the proposed project.

MT-47

Growth Inducement/Population and Housing. The DEIR limits the analysis of the impacts of the project on growth inducement, population, and housing to the area of undeveloped land adjacent to Dirt Mulholland. This approach is near-sighted and unrealistic. Water in this pipeline will be used by current and future development throughout the West San Fernando Valley, not just in the undeveloped area. The DEIR must consider the impact of this additional or "redundant" supply of water on development decisions throughout the area to be served by this project, which is not the area where the project is located.

MT-48

Further, the DEIR limits the analysis of population growth to whether population projections made in the City's community plans that cover the area where the proposed project is to be located would be exceeded (Page No. 4-21). This approach is nonsensical. Right now, there is no population living adjacent to Dirt Mulholland for the greatest part of its length. Any increase in population in the tracts adjacent to Dirt Mulholland — including Tract 33454 — resulting from the creation of a water supply by this proposed project will be a growth impact of this project. If the DWP is to consider growth projections, they should include in the Final EIR any projections of population growth made by DWP itself as part of its water service planning activities.

MT-49

The impacts of the proposed project on growth inducement, population growth and housing should be considered in four ways: (1) the effect of the proposed project in inducing development on tracts adjacent to, or in close proximity to, the proposed water pipeline in an area that is currently undeveloped open space; (2) the effect of the proposed project in inducing growth in the vicinity of the proposed pipeline through development of water supply, an increase in water pressure, the provision of redundancy in supply, and so forth, especially Tract No. 33454, the Girard Tract, and areas considered underserved by Topanga Tank system; (3) the effect of the proposed project in inducing growth in areas throughout the West Valley that will be receiving water from this system; and (4) the impact of the proposed project on areas of the West Valley where water service may be enhanced by the elimination of water demand from the project service area.

MT-50

Further, the Final EIR should consider the potential growth inducement impact of the proposed water pipeline on areas in Los Angeles County adjacent to the area to be served by the proposed water pipeline, which are currently subject to water supply

MT-50

restrictions. There is currently a connection between the DWP water system and the Los Angeles County water system at the Girard pumping station, and water is diverted from the DWP system to the County system at this connection. An increase in the availability of water created by the construction of the Mulholland water pipeline would make additional water supplies available for diversion by the County, potentially increasing growth and development in a currently undeveloped area.

Mitigation Measures. The DEIR proposes as mitigation measure BIO-1, that a preconstruction survey of rare plants and raptor nesting areas be conducted. This measure should have been implemented prior to preparation of the EIR, not after the fact. This aspect of the DEIR does not meet the CEQA standard of commitment and objectivity [see Sacramento Old City Association v. City Council, 228 Cal. App 3d 1011 (1991)].

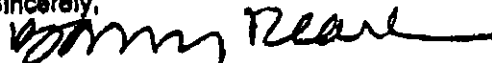
Further, the summary of mitigation measures in Section 5.0 of the DEIR is incomplete. It should be revised to list all of the mitigation measures discussed in the substantive portion of the EIR.

Mulholland Scenic Parkway Specific Plan EIR. The DEIR relies on the Mulholland EIR as an authority for many of its conclusions. The Mulholland EIR, however, was prepared in 1985. Many of the assumptions in that EIR regarding development of the adjacent to Mulholland Drive and the increased pressure on Mulholland Drive from recreational users have proven inaccurate in the face of changed circumstances (e.g., the purchase of property by public agencies, the closure of Dirt Mulholland to vehicles). The reliance on the Mulholland EIR in the Final EIR should be reconsidered in light of these changes in conditions affecting the conclusions and mitigation measures discussed in the 1985 EIR.

In summary, the DEIR is inadequate over all, inaccurate in many particulars, and largely unsubstantiated. We have commented on many of these issues in our previous letters of July 14, 2000, and December 26, 2000, and adopt those comments herein, as pertinent. We strongly urge the Department to hold public hearings on this DEIR and obtain further comments before proceeding to the preparation of a Final EIR.

If you have any questions in this regard, please contact me at (310) 318-2777, or by fax at (310) 374-1870.

Sincerely,



Barry Read
Executive Director

Via fax to (213) 367-3582 and regular mail

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MT – 47:

Section 4.3 of the EIR provides an analysis of the growth inducing potential of the proposed project on the undeveloped areas that could be served by the project. Already developed areas have an existing water supply and are not limited by the absence of water supply infrastructure. In addition, the creation of a redundant water supply to an already developed area is not additional water, rather it is a back-up source of water. The purpose of redundancy is to provide reliable service. The objective is to be able to provide water from more than a single source in the event that one of those sources should fail. Water is currently available throughout the western San Fernando Valley. However, the dependability of providing this water is significantly compromised should its source be cut-off.

MT – 48:

As indicated in the EIR (e.g., Section 4.3.2), the Mulholland Estates Tract 33454 has already been approved and currently under construction. In that Tract 33454 has been approved and that construction activities have already commenced for this development, the proposed project, for all practical purposes is simply fulfilling such legally approved need and, as such, is not considered growth inducing to this development.

Through the Framework Element and the individual Community Plans of the City of Los Angeles General Plan, the Los Angeles Planning Department lays out the areas of development throughout the City. These plans, in addition to the projections that are prepared by the Southern California Association of Governments provide the basis for projected growth that the City's infrastructure is designed for. As noted by Tract 33454, the LADWP does not plan growth, but rather accommodates it.

The proposed project would allow for greater ease of connection by future development projects in the area already planned for in the City's community plans. For purposes of the analysis, growth impacts are considered significant if population projections exceed estimated and planned growth as identified in the community plans. LADWP projections have already been accounted for in the EIR when conducting the growth inducing analysis.

MT – 49:

The EIR does consider growth inducement on the undeveloped tracts adjacent to the proposed project. As stated in Section 4.3.2, "Consideration is given to the potential for developers to target undeveloped property in the canyons and hills for development based on the presence of such infrastructure as a water pipeline."

As stated in Section 4.3.2, "Installation of the new pipeline would ease the connection of future development to an existing water source. Although the improved availability of water would potentially attract new development to the project area, this is not considered to be a substantial factor influencing the rate of growth in the area. The proposed project site is deficient in a number of infrastructure related services and facilities which serve to deter the rate of growth in the area.

See also previous responses to WHHO – 13, SMMC – 1, SMMC – 2 and MT-47.

MT – 50:

While the LADWP has entered into an agreement with the County of Los Angeles, to provide supplemental water supply, it is only temporary. The LADWP will occasionally enter into an "emergency" water service agreement with another water service provider to ensure water supply during

shortages or “emergencies”. These agreements are only meant to be temporary, until a dependable water supply can be provided. The water supplied to the County of Los Angeles is temporary, until the County can complete the necessary improvements to its water supply system. Please also see previous response to MT-11 Topanga Canyon Trunk Line.

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restrictions. There is currently a connection between the DWP water system and the Los Angeles County water system at the Girard pumping station, and water is diverted from the DWP system to the County system at this connection. An increase in the availability of water created by the construction of the Mulholland water pipeline would make additional water supplies available for diversion by the County, potentially increasing growth and development in a currently undeveloped area.

MT-51

Mitigation Measures. The DEIR proposes as mitigation measure BIO-1, that a preconstruction survey of rare plants and raptor nesting areas be conducted. This measure should have been implemented prior to preparation of the EIR, not after the fact. This aspect of the DEIR does not meet the CEQA standard of commitment and objectivity [see Sacramento Old City Association v. City Council, 229 Cal. App 3d 1011 (1991)].

MT-52

Further, the summary of mitigation measures in Section 5.0 of the DEIR is incomplete. It should be revised to list all of the mitigation measures discussed in the substantive portion of the EIR.

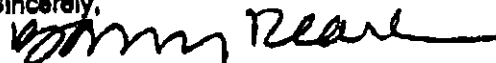
MT-53

Mulholland Scenic Parkway Specific Plan EIR. The DEIR relies on the Mulholland EIR as an authority for many of its conclusions. The Mulholland EIR, however, was prepared in 1985. Many of the assumptions in that EIR regarding development of the adjacent to Mulholland Drive and the increased pressure on Mulholland Drive from recreational users have proven inaccurate in the face of changed circumstances (e.g., the purchase of property by public agencies, the closure of Dirt Mulholland to vehicles). The reliance on the Mulholland EIR in the Final EIR should be reconsidered in light of these changes in conditions affecting the conclusions and mitigation measures discussed in the 1985 EIR.

In summary, the DEIR is inadequate over all, inaccurate in many particulars, and largely unsubstantiated. We have commented on many of these issues in our previous letters of July 14, 2000, and December 28, 2000, and adopt those comments herein, as pertinent. We strongly urge the Department to hold public hearings on this DEIR and obtain further comments before proceeding to the preparation of a Final EIR.

If you have any questions in this regard, please contact me at (310) 318-2777, or by fax at (310) 374-1870.

Sincerely,



Barry Read
Executive Director

Via fax to (213) 367-3582 and regular mail

MT – 51:

Surveys for sensitive plant species are conducted during the blooming season to ensure more accurate identification. Consequently, this survey was deferred to the appropriate season for inclusion in the Final EIR. In addition, since most birds are migratory in nature, “advance” nesting surveys conducted prior to the preparation of the Draft EIR would be inherently inadequate and would provide little value should project construction commence outside of the nesting season. See responses to WHHO – 17, WHHO – 18 and WHHO – 21.

MT – 52:

All of the mitigation measures in Sections 3.0 and 4.0 are listed in Section 5.0. Section 5.0 has been revised to account for new or revised mitigation measures.

MT – 53:

Comment noted. The mitigation measures presented in the EIR are specific to the proposed project and not to the Mulholland Scenic Parkway Specific Plan EIR. It is acknowledged that the Mulholland Scenic Parkway Specific Plan EIR is a 15-year old document. However, current circumstances involving the pending purchase of the Avatar property (Tract 50784) by the SMMC suggest that recreational use in the area would increase as assumed in the MSPSP EIR and therefore is reasonably expected.

FROM :

FAX NO. :

Jun. 11 2001 08:07AM P1



Friends of Caballero Canyon

19528 Ventura Boulevard, #217
Tarzana, CA 91356

June 11, 2001

Mr. Kelvin Lew
Environmental Assessment
City of Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Delivered by Fax to 213/367-3582

Post-It Fax Note	7671	Date	6/11	# of pages	3
To	Charles Smith	From	Kevin		
Co./Dept.	URS	Co.	LADWP		
Phone #		Phone #	213-367-0242		
Fax #	714-667-7147	Fax #	213-367-3582		

Dear Mr. Lew:

Our group, Friends of Caballero Canyon, is a 501(c)(3) organization dedicated to the preservation of the Big Wild as untouched open space.

We are writing to dissent with your April 26th, "Mulholland Water Pipeline Project: Draft Environmental Impact Report" ("your report"). We believe your conclusion that the Pipeline would not induce significant growth is wrong since your report failed to consider two critical factors: 1) Public Sector Development and 2) Land Value.

1. Public Sector Development.

FCC-1

As referenced in your report (pg. 4-16), CEQA Guidelines require you to "... discuss the characteristic of [any project which could] encourage and facilitate other activities that could significantly affect the environment ...". Certainly one such characteristic would be the Pipeline's tendency to encourage public agencies to construct facilities not otherwise practical without water. Examples of such facilities might include grass parks, heliports, nature centers, trailheads, and water tanks. Although such facilities might be politically popular, nevertheless they would have a deleterious impact on the area's environment and are a foreseeable consequence of the Pipeline's construction; therefore, we believe they should have been considered in your report.

FCC-2

The only example you mention of a public agency eager to take advantage of the Pipeline's water, is the Los Angeles Fire Department. We believe other public agencies will wish to construct facilities should the Pipeline's water become available.

FCC-3

We would like to know if the Fire Department, in addition to erecting fire hydrants along the Pipeline's route, might also wish to expand their heliport (to the east of your Corbin Tank) to take advantage of the additional water the Pipeline would provide; or if they might wish to build another fire station on Mulholland Drive to compliment the three stations they already operate on Mulholland Drive (at street numbers 12520, 14145, and 16500). We believe you could answer these questions by consulting with the Fire Department's planning department.

FCC – 1:

Comment noted. Section 4.3.2 of the EIR does acknowledge that “installation of the new pipeline would ease the connection of future development to an existing water source”, which may in turn, facilitate the construction of “grass parks, heliports, nature centers, trailheads and water tanks.” The EIR further states that “although the improved availability of water would potentially attract new development to the project area, this is not considered to be a substantial factor influencing the rate of growth in the area.”

The SMMC already has identified features as trailheads and nature centers in their Mulholland Gateway Park Plan 1991 and the adopted Mulholland Gateway Park Additions Project Plan (October 23, 2001), even in the absence of a water pipeline. In that the improved availability of water resulting from the proposed project is not a substantial factor in influencing the rate of growth in the area, any future development by the Conservancy is speculative and beyond the scope of this EIR. Any future development by the Conservancy or any other entity in the vicinity would be subject to environmental review at that time, depending upon the specific future project under consideration.

FCC – 2:

Comment noted. See the following responses, FCC – 3 and FCC – 4.

FCC – 3:

The comment appears to refer to the project need and does not pertain to potential environmental impacts that may be associated with the proposed project. In response to the comment, however, the Los Angeles Fire Department was contacted. The LAFD has indicated that it has no current plans to build a heliport (existing pad is not a heliport) nor build a fire station or fire hydrants in the project area (Joe Johnson, 2001).

FROM :

FAX NO. :

Jun. 11 2001 08:07AM P2

Mulholland Pipeline Draft EIR/Comments
 June 11, 2001
 Page 2/3

Similarly, we believe you should interview the planning departments of other municipal agencies likely to exploit the Pipeline's water:

FCC-4

- a) The *Los Angeles Department of Recreation and Parks* to ask them if they might construct soccer fields, golf courses, or grass parks along the Pipeline's route.
- b) The *Los Angeles Unified School District* to find out if they might be planning new schools along the Pipeline's route.
- c) The *Santa Monica Mountains Conservancy* to find out if they might wish to build a nature center, ranger station, or trailhead along the Pipeline's route.

FCC-5

Furthermore, we recommend you interview your own planning department to identify any short- or long-term plans your organization may have for the properties it owns along dirt Mulholland. Just as the Corbin Water Tank induced you to construct the Pipeline, we think it reasonable the Pipeline may induce you to build other facilities to further exploit the water pumped into the Corbin Tank. We would like to know the likelihood that you might construct additional water storage tanks or pumping stations along the Pipeline's route to better serve your customers both current and prospective. In particular, we would like to know what plans your Department may have for the 2.1 acres of undeveloped land (parcel no. 4434-01-04) it owns to the east of the Woodland Hills Estates Subdivision.

2.) Land Value

Your Report does not discuss the effect the Pipeline would have on land values. We believe the availability of water would dramatically increase property values along the Pipeline's route and that such an increase would make it much more likely that these properties would be developed. To determine how much the value of the land along the Pipeline's route might increase once water is available to them, we recommend you consult with an appraiser.

FCC-6

If after consulting with an appraiser, it is your determination that land values along the Pipeline's route would greatly increase, then we believe you should next determine what effect this increase might have in inducing their owners, both private landholders and public agencies, to develop their properties. To help you make this determination, we recommend you consult with a land-use planning consultancy (e.g., the Arfat Consulting Group, Inc.).

Moreover, if the market value of land along dirt Mulholland is likely to dramatically increase as result of the Pipeline's construction, we recommend you interview the Executive Director of the Santa Monica Mountains Conservancy to determine if it is likely that he or his successors might exchange valuable land along the Pipeline's route for relatively inexpensive land elsewhere in the Santa Monica Mountains. Since the Conservancy is the major landholder along the Pipeline's route, we think this question should be asked.

FCC – 4:

The comment appears to refer to the project need and does not pertain to potential environmental impacts that may be associated with the proposed project. However, in response to the comment, the Los Angeles Department of Recreation and Parks (LADRP) was contacted. LADRP has indicated that it has no plans to construct any recreational facility along the proposed pipeline route.

The Los Angeles Unified School District does not have plans to construct a new school along the proposed pipeline route according to the district's website (http://www.laschools.org/project-status/?all_rows=0&colflt.3=c).

The SMMC has prepared and adopted the Mulholland Gateway Park Additions Project Plan (October 2000) which proposes open space, trails, a nature center, restroom facilities, and parking use on the 21000 Mulholland property. The success of such recreational development is contingent upon purchase of the targeted properties identified in the Dirt Mulholland Action Plan.

FCC – 5:

The proposed pipeline is an element of the Corbin Tank Project and is described in the EIR for that project. Construction of the proposed pipeline was not induced by the Corbin Tank. No other water service facilities are planned along the project alignment. In addition, LADWP has no plans for the 2.1 acres of undeveloped land east of the Woodland Hills Estates Subdivision at this time.

FCC – 6:

The comment pertains to the potential increase in land values created by the proposed project and its potential to further increase development. The potential for growth inducement has been addressed in Section 4.3 of the EIR. As illustrated in Figure 11, there are only two undeveloped parcels immediately adjacent to the proposed project. Only one of these parcels, located at 21000 Mulholland, would receive water from the proposed project. This parcel has already been approved for development. The other parcel, Avatar (Tract 50784), has water service available from existing lines in Chapter and Natoma and is not dependent on the new pipeline for service. Thus, the presence of the pipeline has a marginal influence on the development potential of these parcels. In addition, the SMMC has already entered into negotiations with the property owners of Tract 50784 to purchase the property to preserve as open space. Upon consultation with the Executive Director of the SMMC, it is not foreseeable that the SMMC would sell off its land holdings merely because the value of the property has increased. (SMMC, 2001)

FROM :

FAX NO. :

Jun. 11 2001 08:08AM P3

Mulholland Pipeline Draft EIR/Comments
June 11, 2001
Page 3/3

In conclusion, we believe your determination that the Pipeline's effect on the environment would be benign is wrong since you failed to consider 1) how the public sector would be likely take advantage of the Pipeline's water and 2) how increased land values would stimulate development along the Pipeline's route. We urge you to thoroughly analyze these two growth-inducement factors in your Report's final draft. We expect that should you do so, you will agree with us that the Pipeline, should it be built, would likely result in substantial damage to the Big Wild's environment.

Sincerely,



Charles R. Milbourne
Board Member

FROM : CIFT

FAX NO. : 3439039

Jul. 11 2001 04:30PM P1



June 11, 2001

BY FAX

Mr. Kelvin Lew
City of LA
Department of Water & Power
(213) 367-3582

**RE: Addendum to Board Member Chuck Milbourne's response
to DEIR, Mulholland Water Pipeline Project**

We respectfully request you include the following to the Friends of Caballero Canyon comments:

FCC-7

P. 8, 3.2.3 (Sensitive Wildlife) and 3.2.4 Wildlife Movement: There appears to be no recognition of the cougar/mountain lion (*Felis concolor*) in either section. This is a serious oversight and needs correction, amplification and verification (see citations* for further documentation and information). This writer has personally followed prints of cougar and knows at least seven individuals** who have seen an adult (or in one case, a juvenile) cougar in the vicinity of the project. Cougars are at the top of the biological food chain in our Santa Monica Mountains, and are indicators of a "balanced" ecosystem.

FCC-8

It is further incumbent upon the preparer to consult the MULHOLLAND GATEWAY PARK Draft Master Plan (Community Development by Design, prepared for the Santa Monica Mountains Conservancy, July, 1991), p. 20, see all paragraph 2 (which references acreage -64,000 - and gene pool needs). Same document, p. 21, paragraph 3:

Roads fragment wildlife habitat, often leading to species isolation and decline, etc.

Same document, p. 20, item 2:

Given the importance of unpaved Mulholland as an east-west wildlife link, and the probable impact on wildlife if the road were paved, unpaved Mulholland should serve as a park road and should not be paved.

FCC-9

The sign posted eight (8) years ago (at the Mulholland-Bent Arrow Trail intersection succinctly describes what to do should you encounter mountain lion. The California Department of Parks & Recreation posted this sign with good reason.

FCC – 7:

Comment noted. Sitings of cougar/mountain lion (*Felis concolor*) is acknowledged in Section 4.1.1 of the EIR as evidenced by the individuals mentioned in the comment letter, dated June 11, 2001.

The impact of construction activities on this animal are considered indirect, short-term, and temporary in nature. Such indirect impacts would involve temporary obstruction of portions of the road and only along certain segments of the roadway being worked on. Upon completion of the project, the road would continue to provide the same accessibility as before the project. The cougar/mountain lion's habitat would remain intact and would not be destroyed upon implementation of the proposed project.

FCC – 8:

The comment references excerpts from the Mulholland Gateway Park Draft Master Plan relating to the effects of roads on wildlife habitat and impacts of paved roads on wildlife. As indicated in Section 1.1, "no aspect of the proposed project would necessitate the need to pave the unpaved portion of the existing roadway."

FCC – 9:

Comment noted. Please refer to response FCC – 7.

FROM : CLIFT

FAX NO. : 3439039

Jul. 11 2001 04:31PM P2

Thank you for including these additional comments.

Sincerely,

Jill Swift, President
Friends of Caballero Canyon
For fast response correspondence: 19261 Wells Dr., Tarzana 91356

* 1. "Habitat Fragmentation and Urban Edge Effects in the Santa Monica Mountains", 1990, Raymond Sauvajot (Ph.D, presently with the National Park Service --SMMNRA) and Dr. Marybeth Buechner.

* 2. "Critical Wildlife Corridor/Habitat Linkage Areas Between the Santa Susana Mountains, the Simi Hills and the Santa Monica Mountains", Paul Edelman, Santa Monica Mountains Conservancy.

* 3. "Park Protection and Public Roads", Christine Schoenwald-Cox, National Park Service Cooperative Studies Unit, U. of California, Davis, and Marybeth Buechner.

** Names of individuals who have seen cougar either in Caballero Canyon or on dirt Mulholland:

Virginia Halstead, Illustrator-artist and husband, Joe Martino
Harriet and Don Levinson, residents adjacent to dirt Mulholland
Dr. Jean Rosenfeld, historian and Dr. Howard Rosenfeld, MD
Mrs. Halli Mason (Board Member, LA-Santa Monica Mts. Chapter, California Native Plant Society)



State of California • The Resources Agency

DEPARTMENT OF PARKS AND RECREATION

Angeles District
1925 Las Virgenes Road
Calebasas, CA 91302

Post-It® Fax Note	7671	Date	6/18/01	# of pages	2
To	Charles / Christine	From	Kevin Lew		
Co./Dept.	URS	Co.	LAWP		
Phone #		Phone #	213-3670202		
Fax #	714-433-7701	Fax #			

remor
rector

RECEIVED
JUN 18 2001
CES

June 14, 2001

Charles Holloway
City of Los Angeles
Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Re: Mulholland Water Pipeline Project, SCH #2000061066

Dear Mr. Holloway:

The California Department of Parks and Recreation, Angeles District, has had the opportunity to review the Draft Environmental Impact report for the above – referenced project and offers the following comments for your consideration.

Aesthetics

We are concerned that the proposed project will significantly impact the scenic viewshed of recreational users along the portion of "Dirt" Mulholland Drive and could substantially impact the park visitor's experience. The presence of construction equipment for approximately 350 working days or 18 to 20 months will be a distractive element to the viewshed and to the designated vistas throughout the area. In addition, the presence of water hydrants on the undeveloped segment of "Dirt" Mulholland where none exist will introduce an urban element into essentially wilderness area. The placement of maintenance hole covers along the embankment will further exacerbate and distort the natural terrain.

CDPR-1

Biological Resources

The Department has concerns that the proposed project could reduce the biological diversity along "Dirt" Mulholland by altering various habitats. We are concerned about the potential for significant impacts to native oak trees, even after mitigation. We are encouraged that mitigation measures include a 5:1 ratio replacement for eligible trees within the general vicinity of the proposed project site. However, mature oak trees generally are a dominant, and often keystone elements within their communities, defining the physical and ecological character of the habitats, supporting plant and animal subsystems. Loss of any oaks would severely reduce species diversity overall, both resident and transient use. Therefore the loss of any oak trees would have a direct and significant biological impact to "Dirt" Mulholland.

CDPR-2

CDPR-1:

Section 3.1 of the EIR discusses the potential visual impacts from construction activities. The presence of constructed equipment along the existing roadway would be temporary and would not result in a permanent impacts to the viewshed or designated vistas in the area. As such, this temporary impact is not considered to be significant.

As stated in Section 2.1 Project Description of the EIR, fire hydrants are not part of the proposed project. See also response to WHHO-10.

CDPR-2:

The proposed project would be located along an existing roadway. As indicated in the Biological Survey reports contained in Appendix E of the EIR, no native plant species were found in the existing roadway. No mature oak trees would be removed as a result of the proposed project. As indicated in Section 4.2 of the EIR, trees that could be impacted by construction activities would be mitigated at a ratio of 5:1. See also response to WHHO-21.

Mr. Holloway
June 14, 2001
Page 2

Noise

CDPR-3

We are concerned that the proposed project will increase noise levels along "Dirt" Mulholland from construction equipment and delivery trucks. Park users expect a level of peace and quiet along "Dirt" Mulholland. The potential constant noise coming from a variety of construction equipment, six days a week from 7:00 – 5:00pm would have a direct and significant impact to the tranquil, rural ambiance of the area.

Recreation

CDPR-4

The Department has concerns about any activity that prevents or limits access to park visitors to recreational opportunities along "Dirt" Mulholland. The Mulholland Highway extends along the ridge that constitutes the northern boundary of Topanga State Park. It is an important access link to recreation and open space within the park. Construction activities that detour or close these access links, for approximately 350 working days or 18 to 20 months would have a direct significant impact on the park user.

Growth Inducement/Population and Housing

CDPR-5

We are concerned about the potential of build-out impacts to the remaining properties. The proposed pipeline would bring water infrastructure within reach of a number of private properties adjacent to Mulholland Drive in addition to providing service to the already-approved developments. The proposed project may also affect the future cost of land slated for park acquisition. Lands not in public ownership are not protected or preserved as open space, therefore cannot deter growth to the area.

Thank you for considering our comments.

Sincerely,

For 
Russell G. Guiney
District Superintendent

cc: Arthur Eck, Superintendent, National Park Service, Santa Monica National Recreation Area
Joe Edmiston, Executive Director, Santa Monica Mountains Conservancy
Margo Murman, Executive Officer, Resource Conservation District of the Santa Monica Mountains

CDPR-3:

Comment noted. The temporary increase in ambient noise levels is addressed in Section 3.9 of the EIR. No sensitive receptors (e.g., schools, hospitals) are located in the immediate vicinity of the proposed project. Noise levels would return to current conditions upon project completion. This impact would be temporary and intermittent and is not considered to be significant.

CDPR-4:

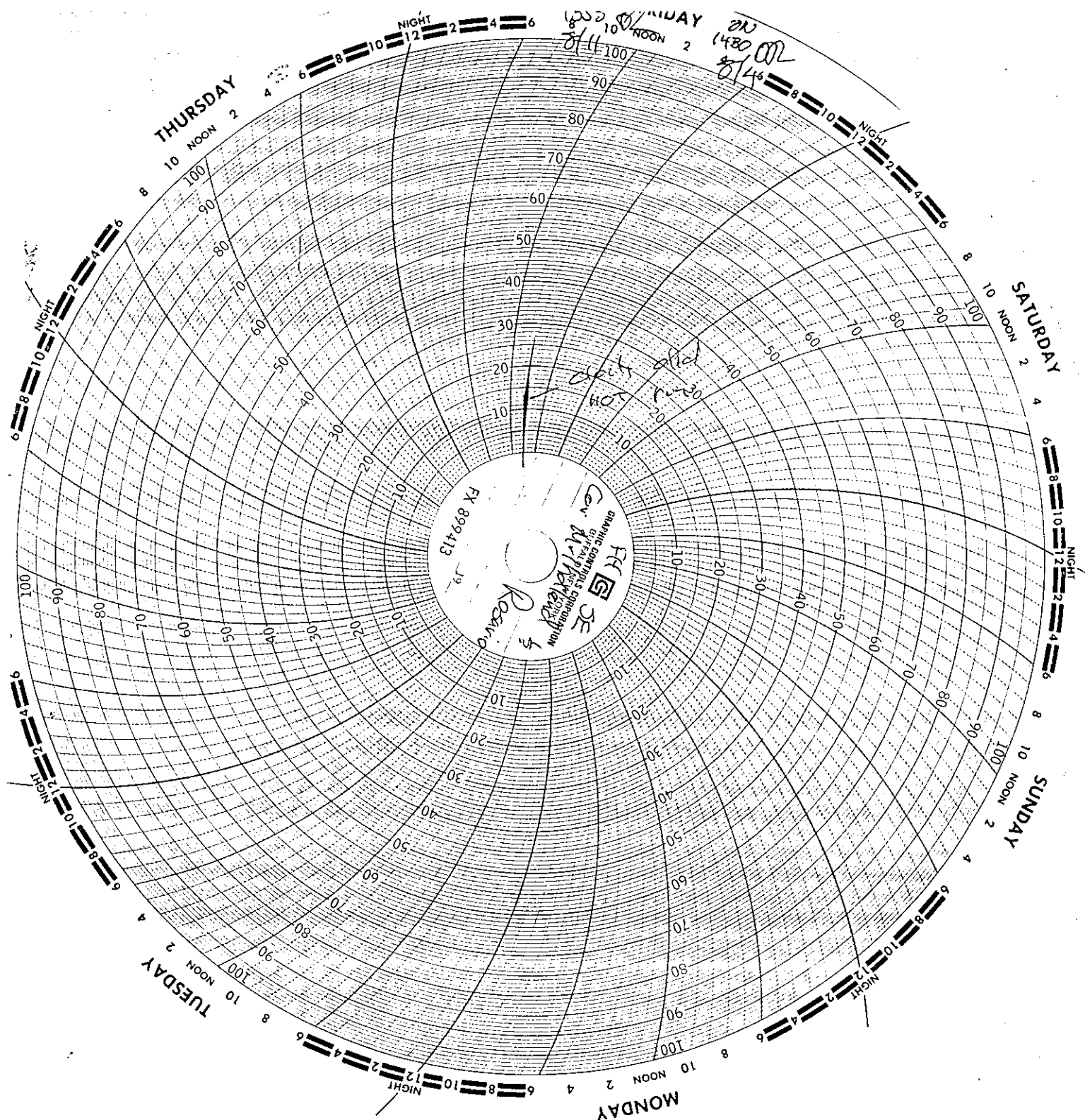
Access along the proposed project route would be temporarily disrupted occurring only during the periods of active construction. The entire length of the proposed project would not be completely closed to recreational users at one time. In locations where the existing roadway is wide enough to ensure public safety, pedestrian access would be maintained. Section 3.11 characterizes recreational impacts resulting from the proposed project as an inconvenience to local users, however, under CEQA, this inconvenience would not increase the use of other nearby parks or recreational facilities, nor require the construction of any new facility to meet existing demand and, thus is not considered significant.

CDPR-5:

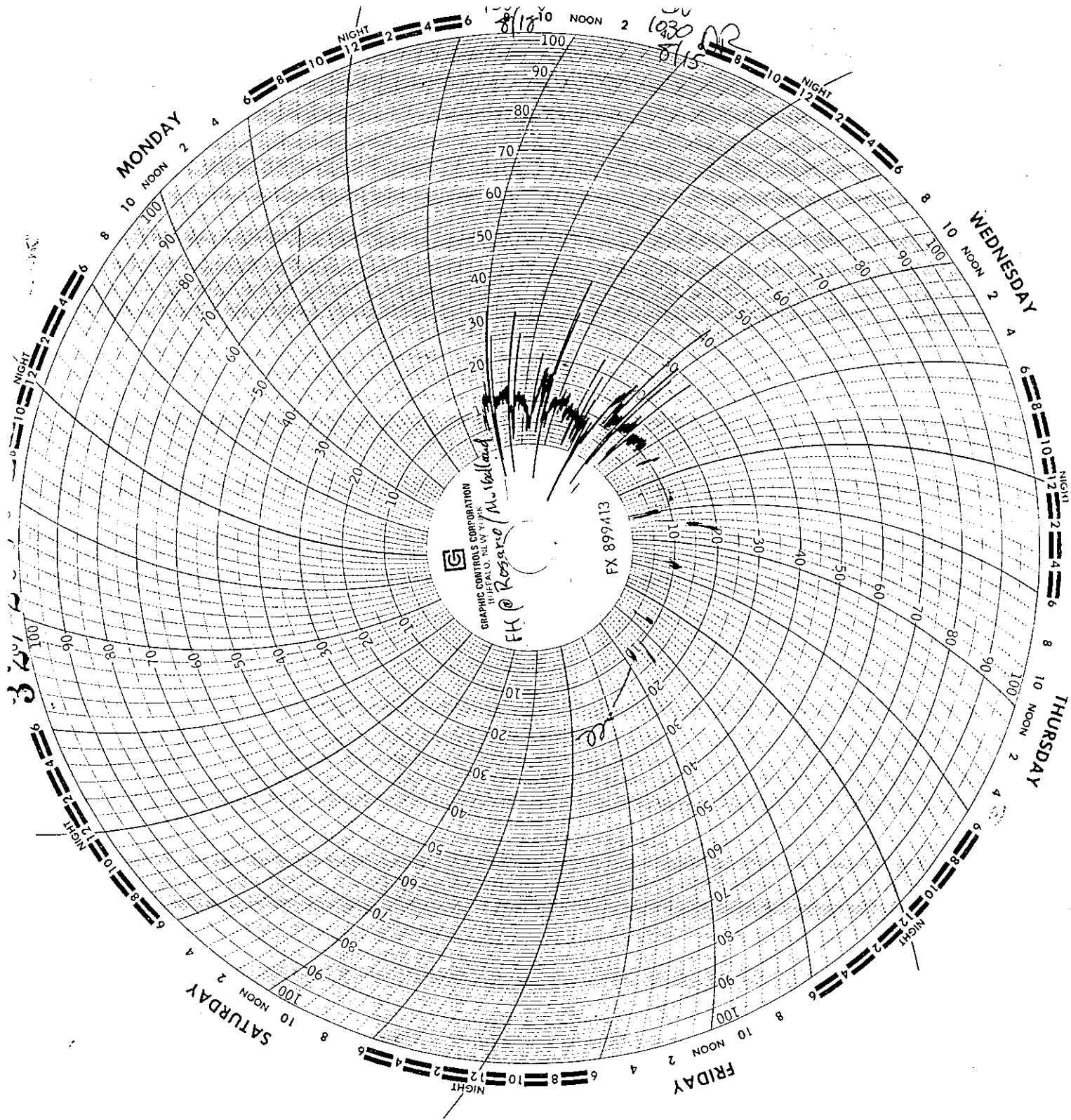
Please refer to responses to SMMC-5, RUTH-1, MT-47, and MT-49.

APPENDIX I
FIRE HYDRANT DATA

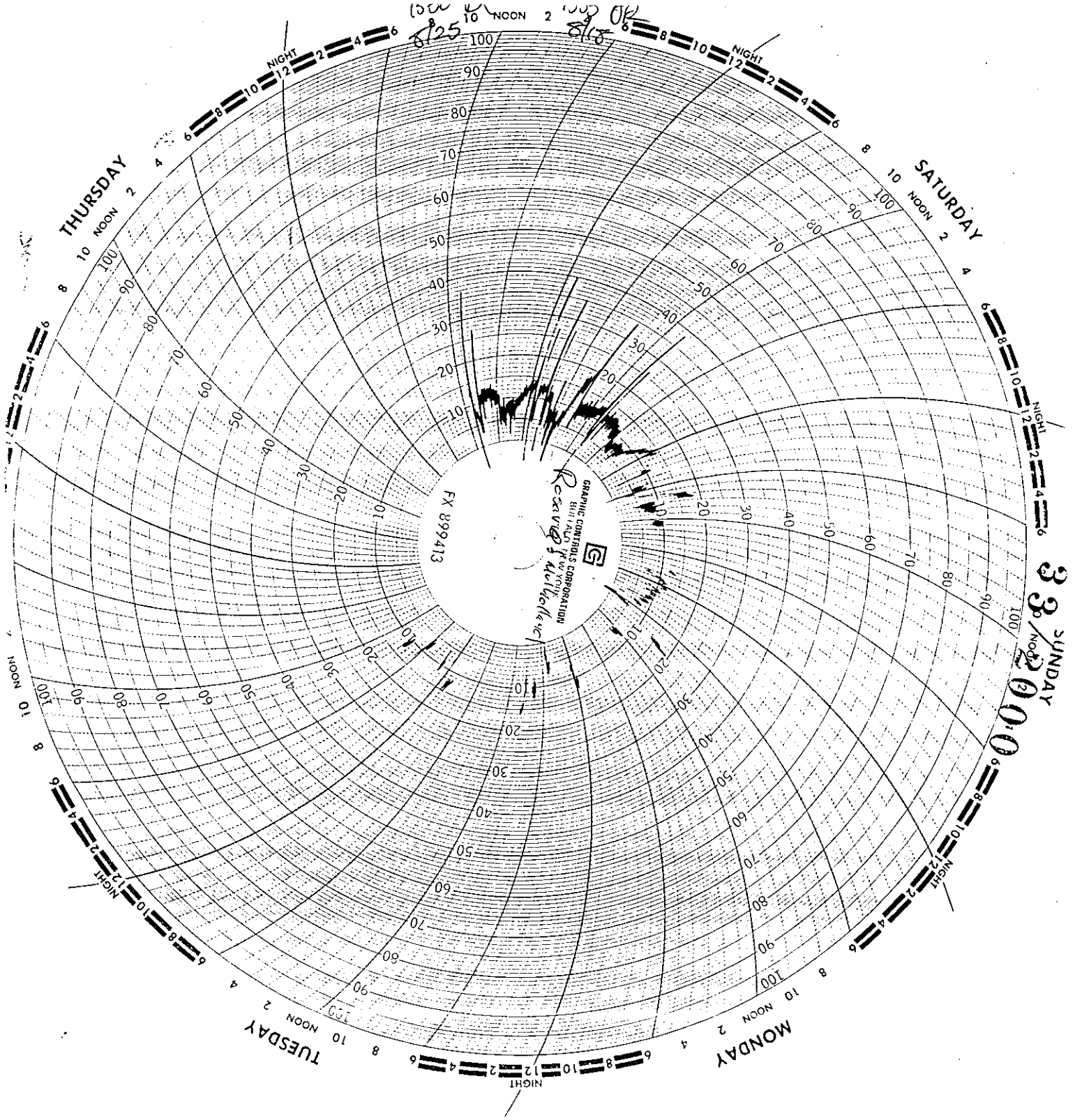
HYDRANT MULHOLLAND DRIVE AND
ROSARIO ROAD
08/04/00 – 09/29/00



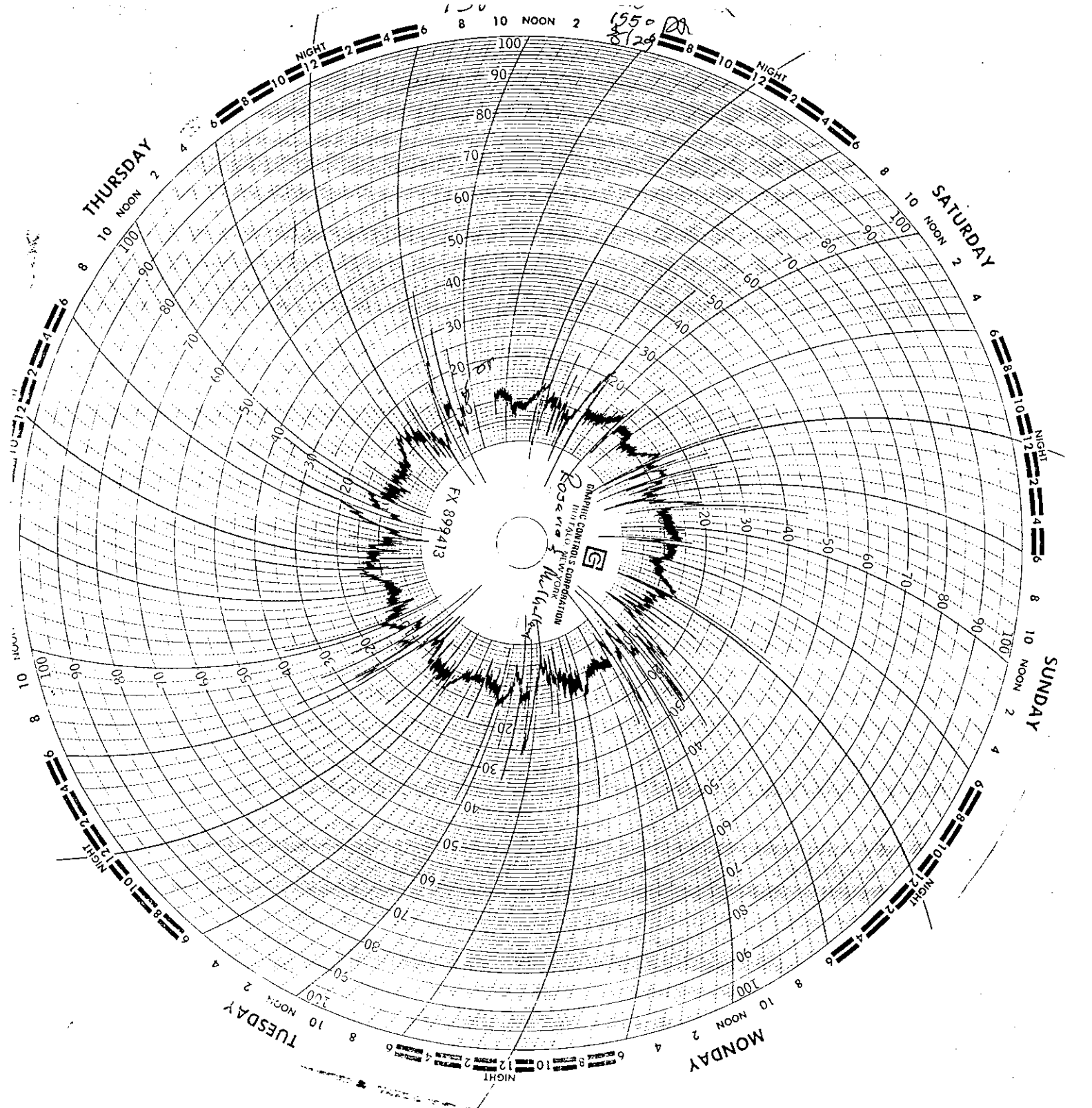
F-50504: Located on Mulholland Drive at Rosario Road



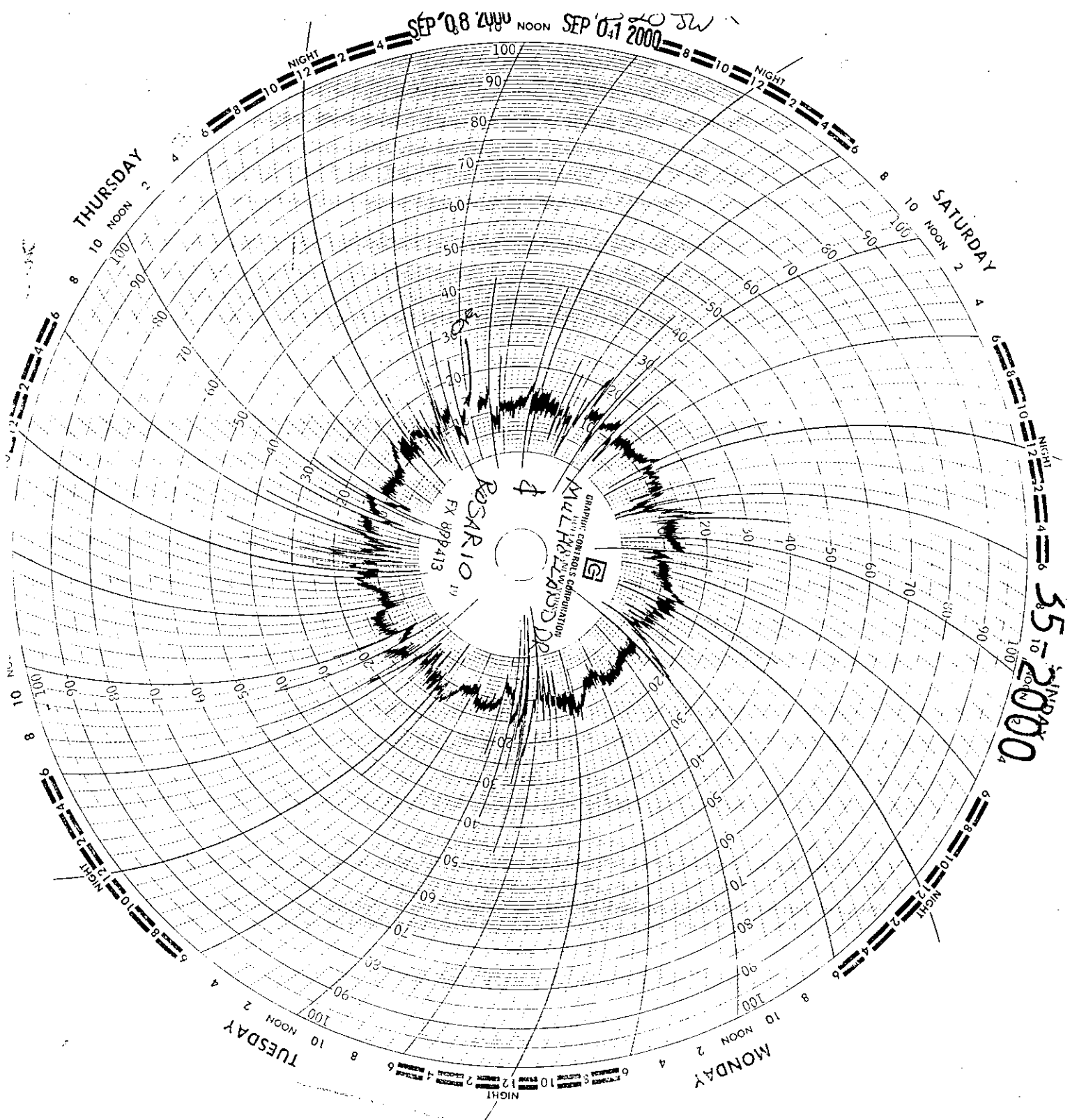
F-50504: Located on Mulholland Drive at Rosario Road



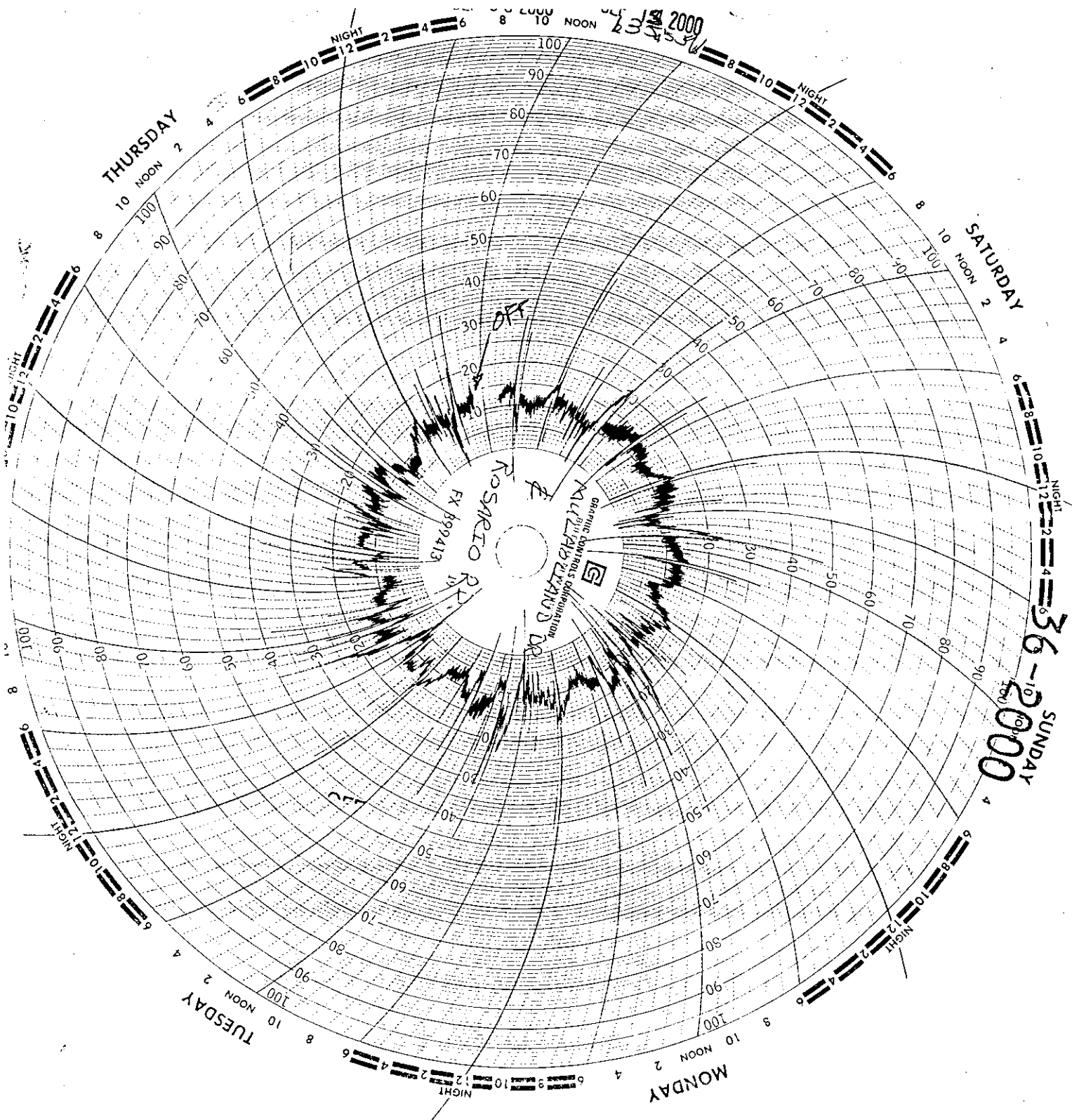
F-50504: Located on Mulholland Drive at Rosario Road



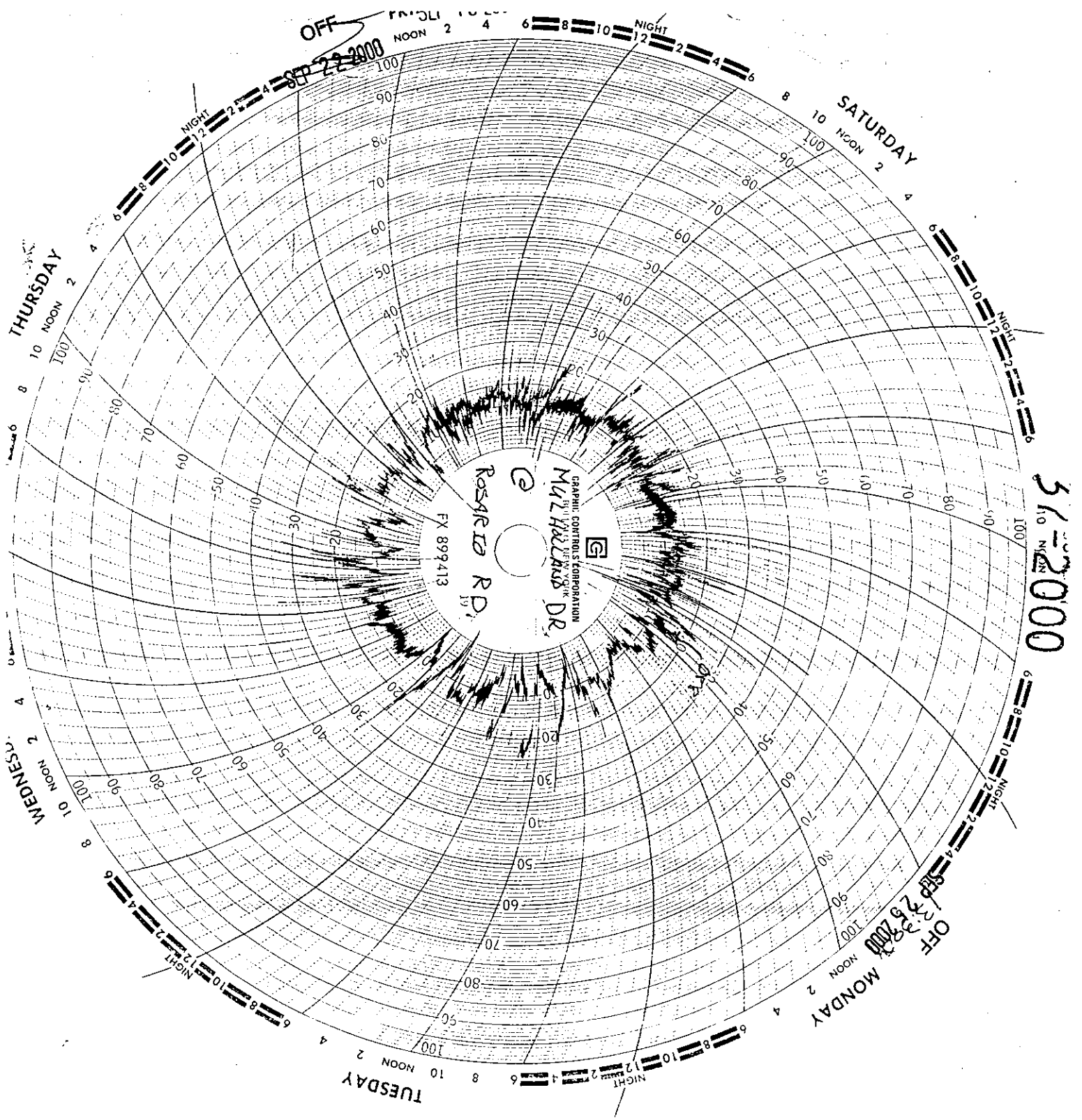
F-50504: Located on Mulholland Drive at Rosario Road



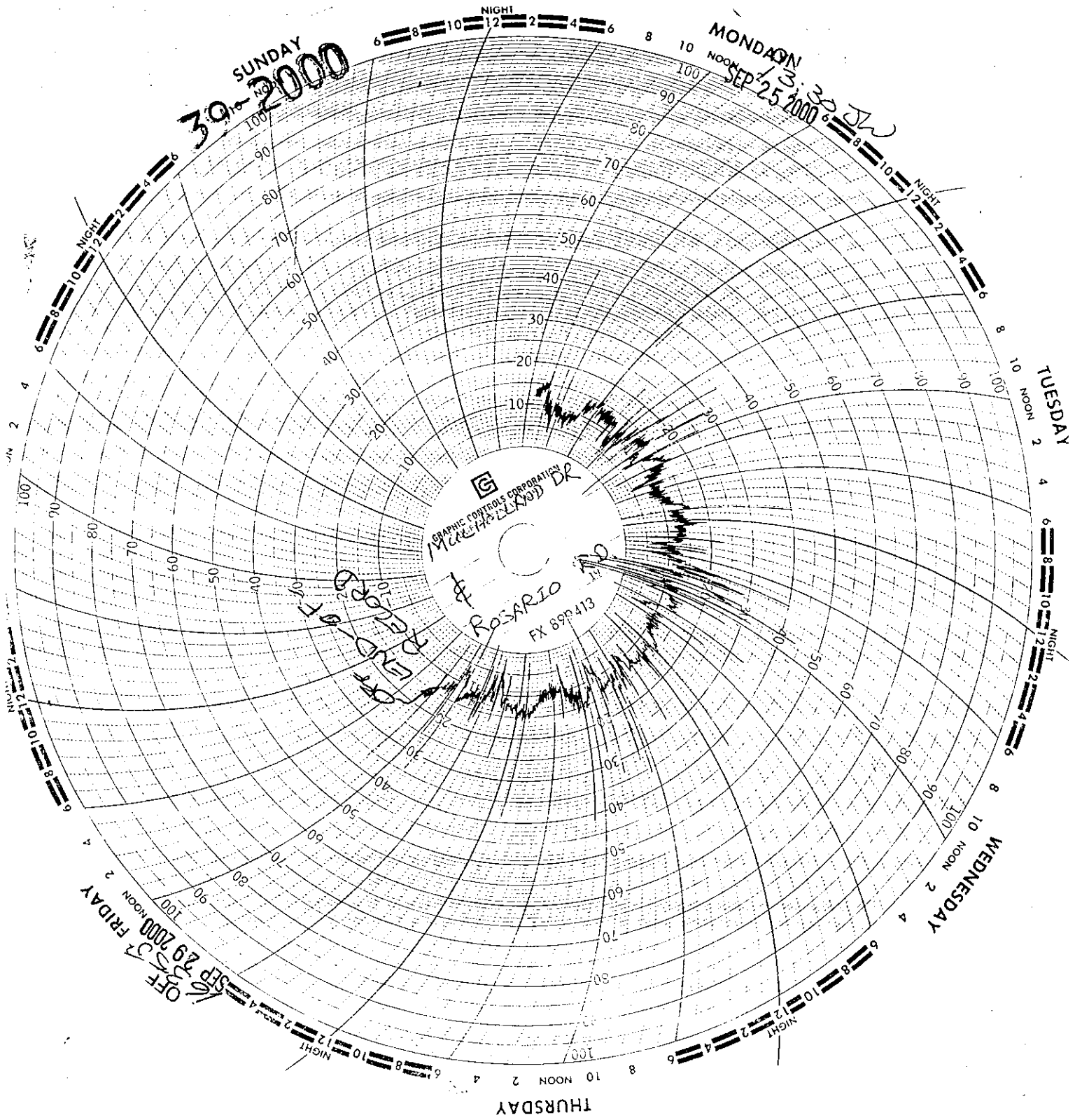
F-50504: Located on Mulholland Drive at Rosario Road



F-50504: Located on Mulholland Drive at Rosario Road

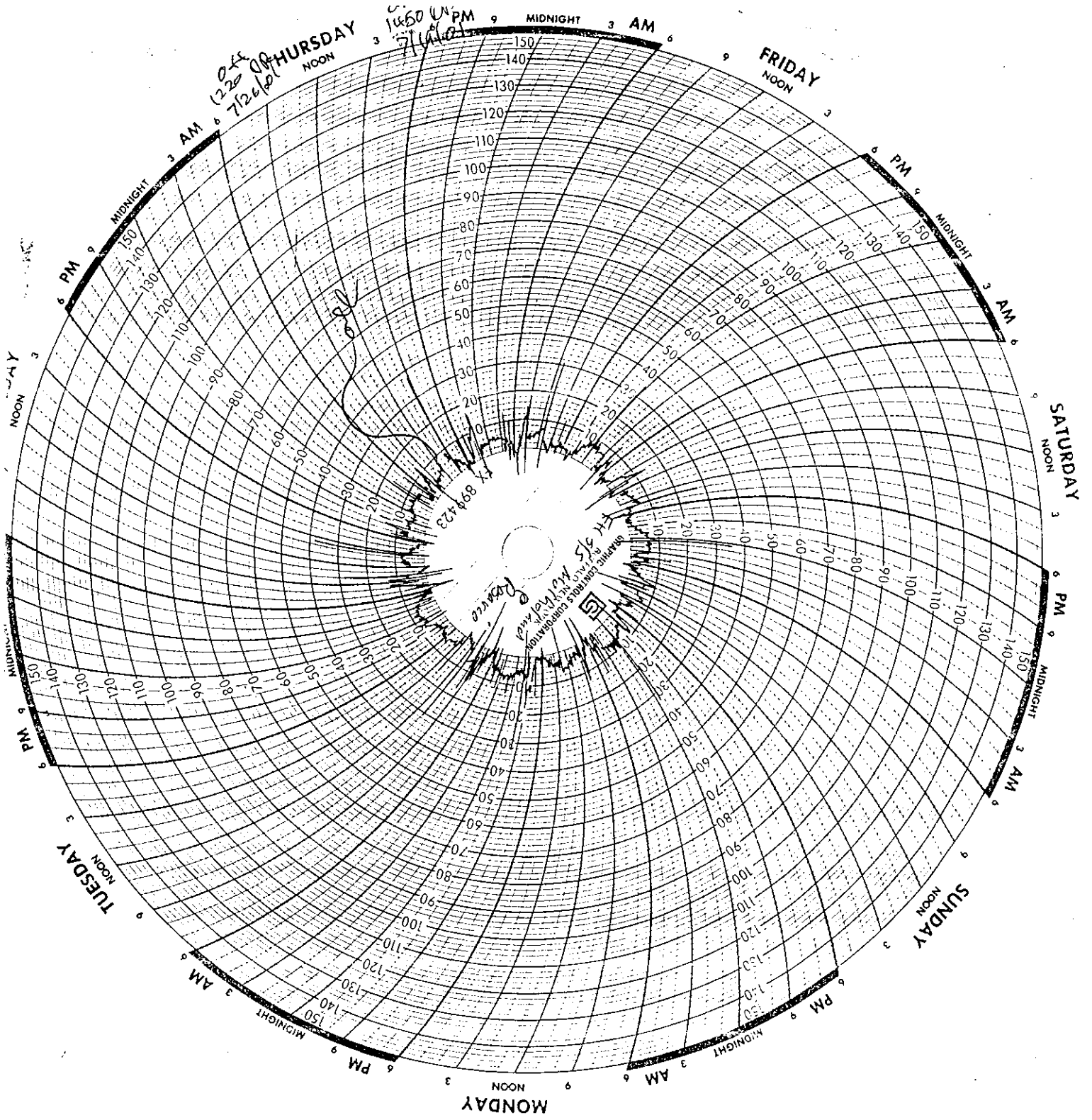


F-50504: Located on Mulholland Drive at Rosario Road

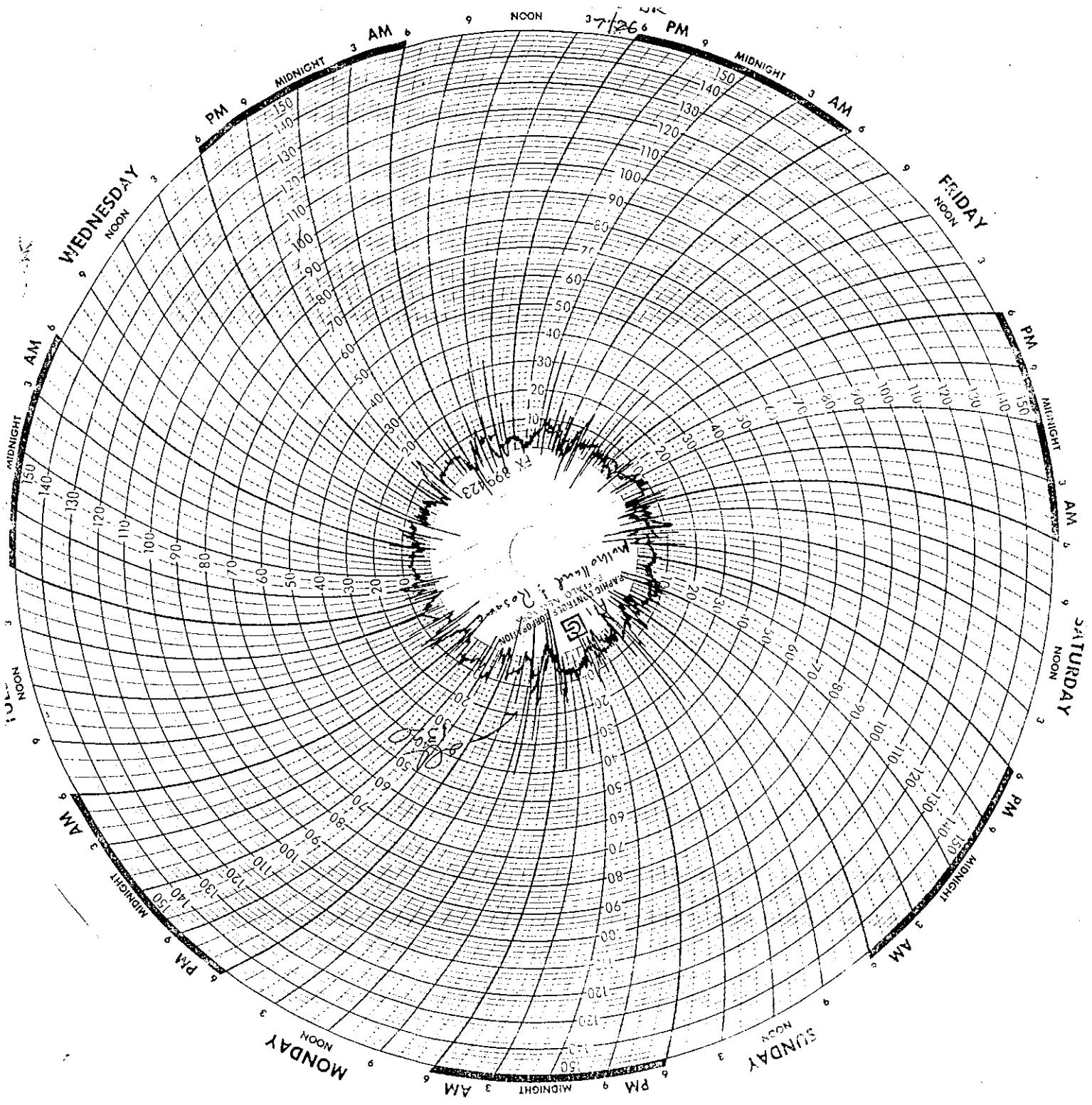


F-50504: Located on Mulholland Drive at Rosario Road

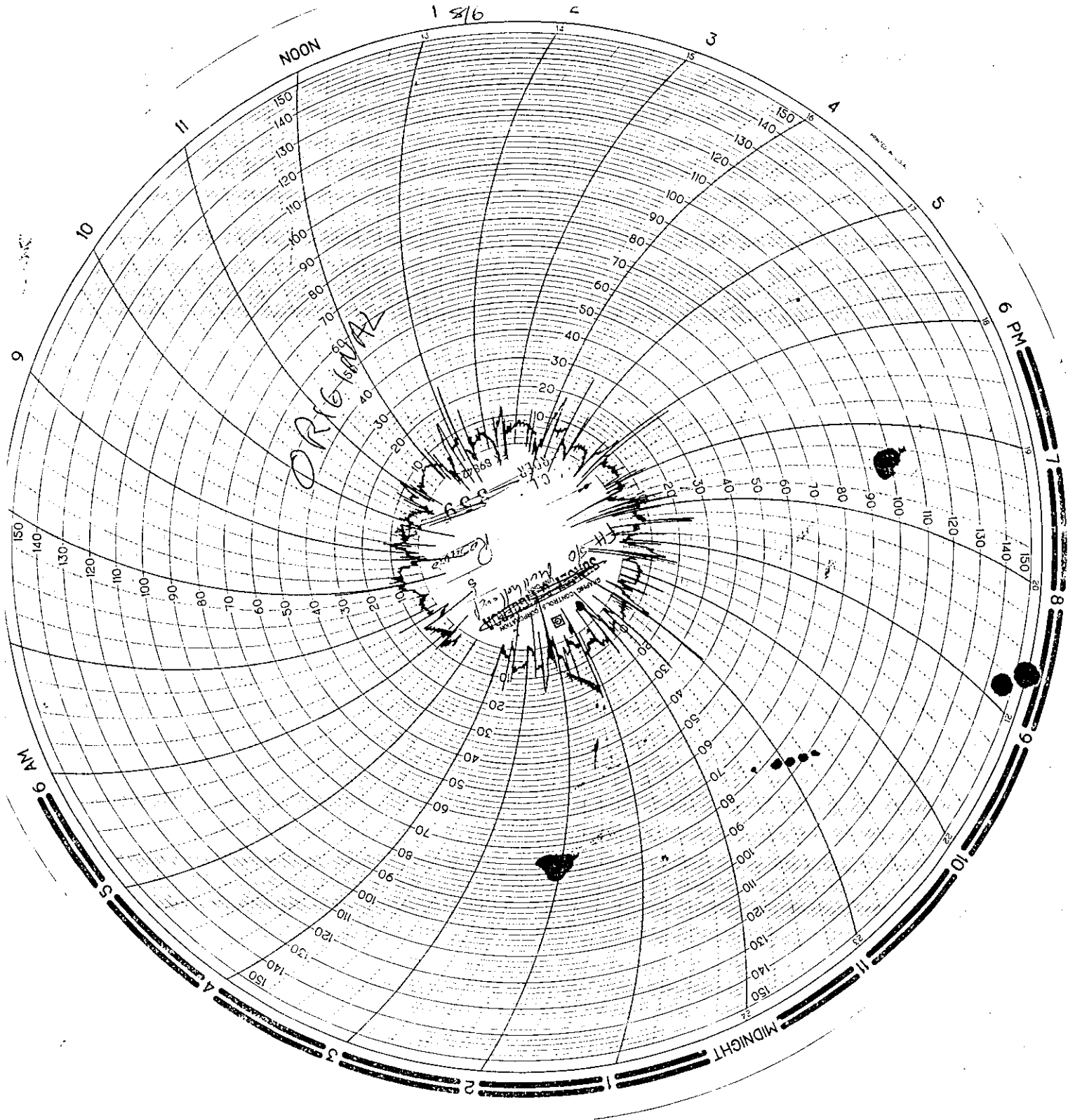
HYDRANT MULHOLLAND DRIVE AND
ROSARIO ROAD
07/18/01 – 08/13/01



F-50504: Located on Mulholland Drive at Rosario Road

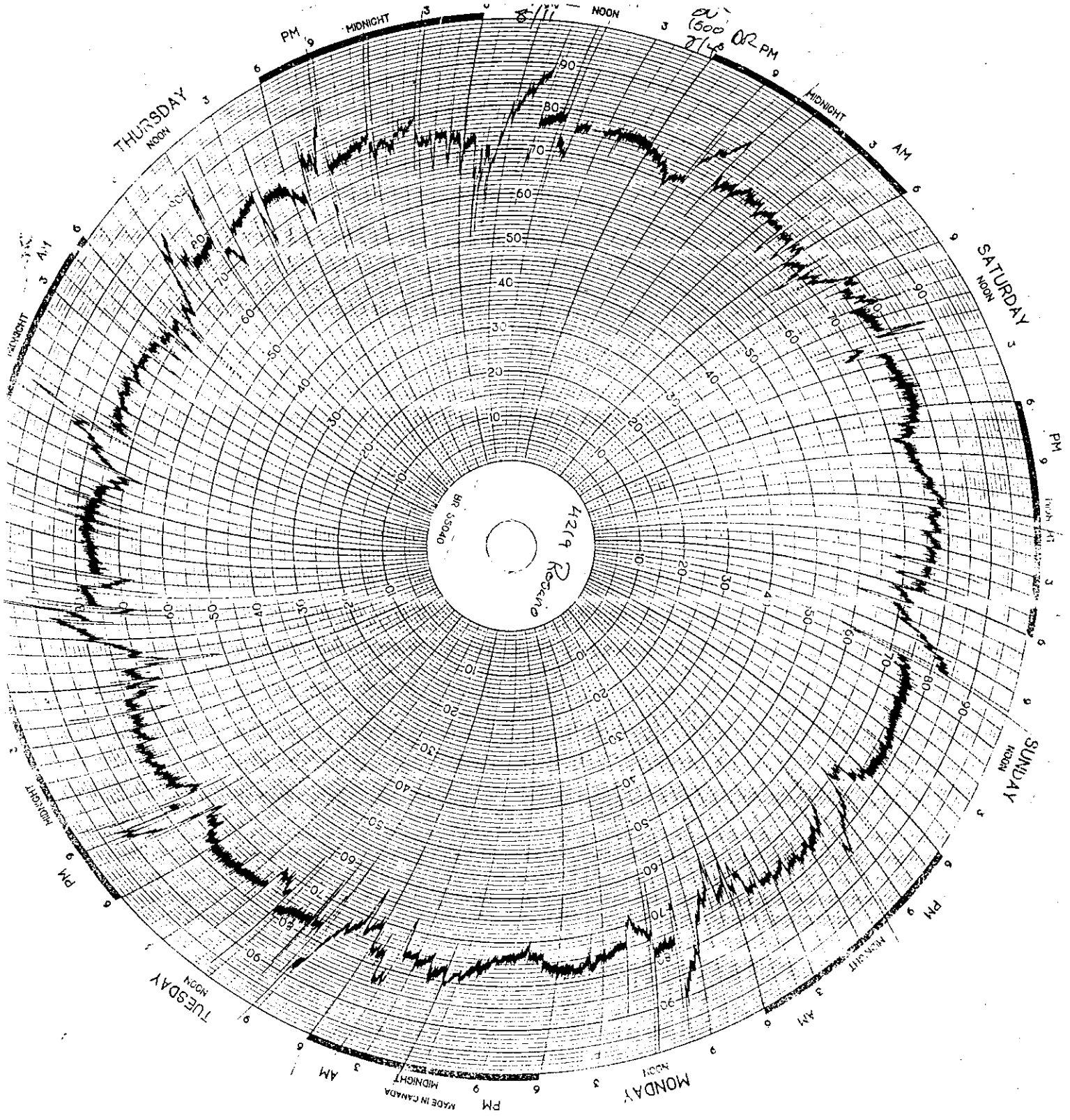


F-50504: Located on Mulholland Drive at Rosario Road



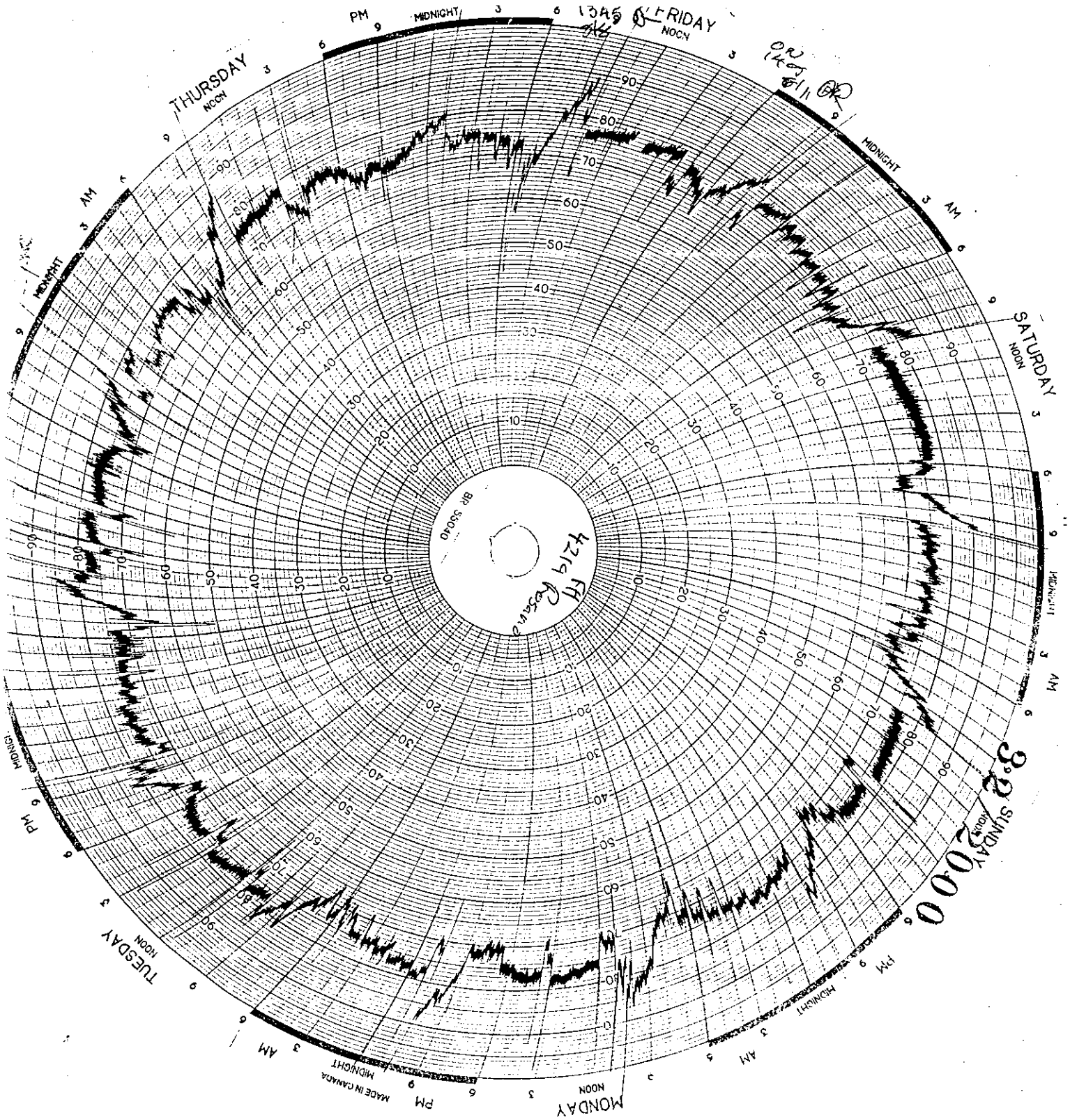
F-50504: Located on Mulholland Drive at Rosario Road

HYDRANT 4219 ROSARIO ROAD
08/04/00 – 09/29/00



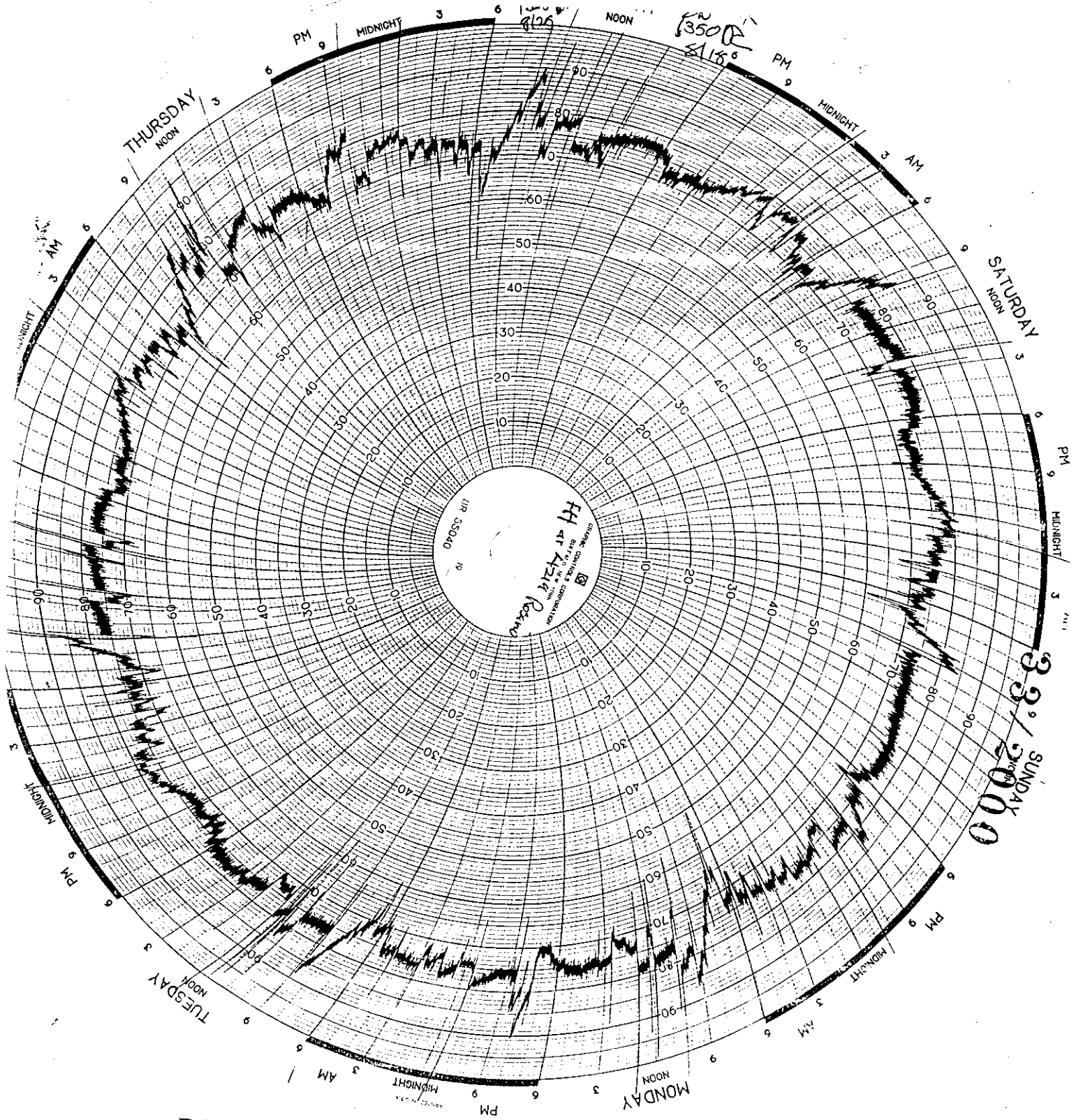
F-73873: Located at 4219 Rosario Road

8/4/00 to 8/11/00



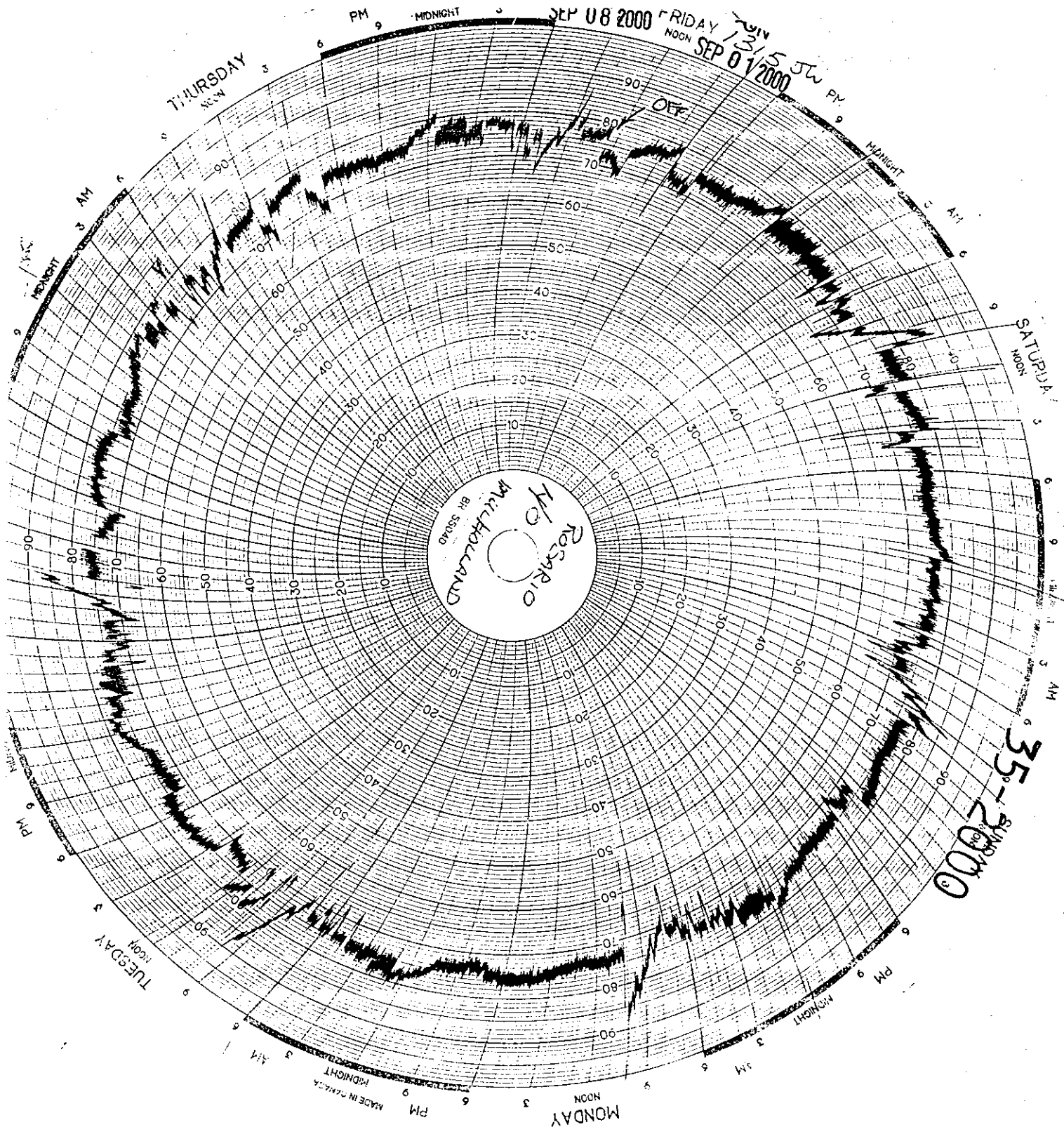
F-73873: Located at 4219 Rosario Road

07/11 to 8/18/00



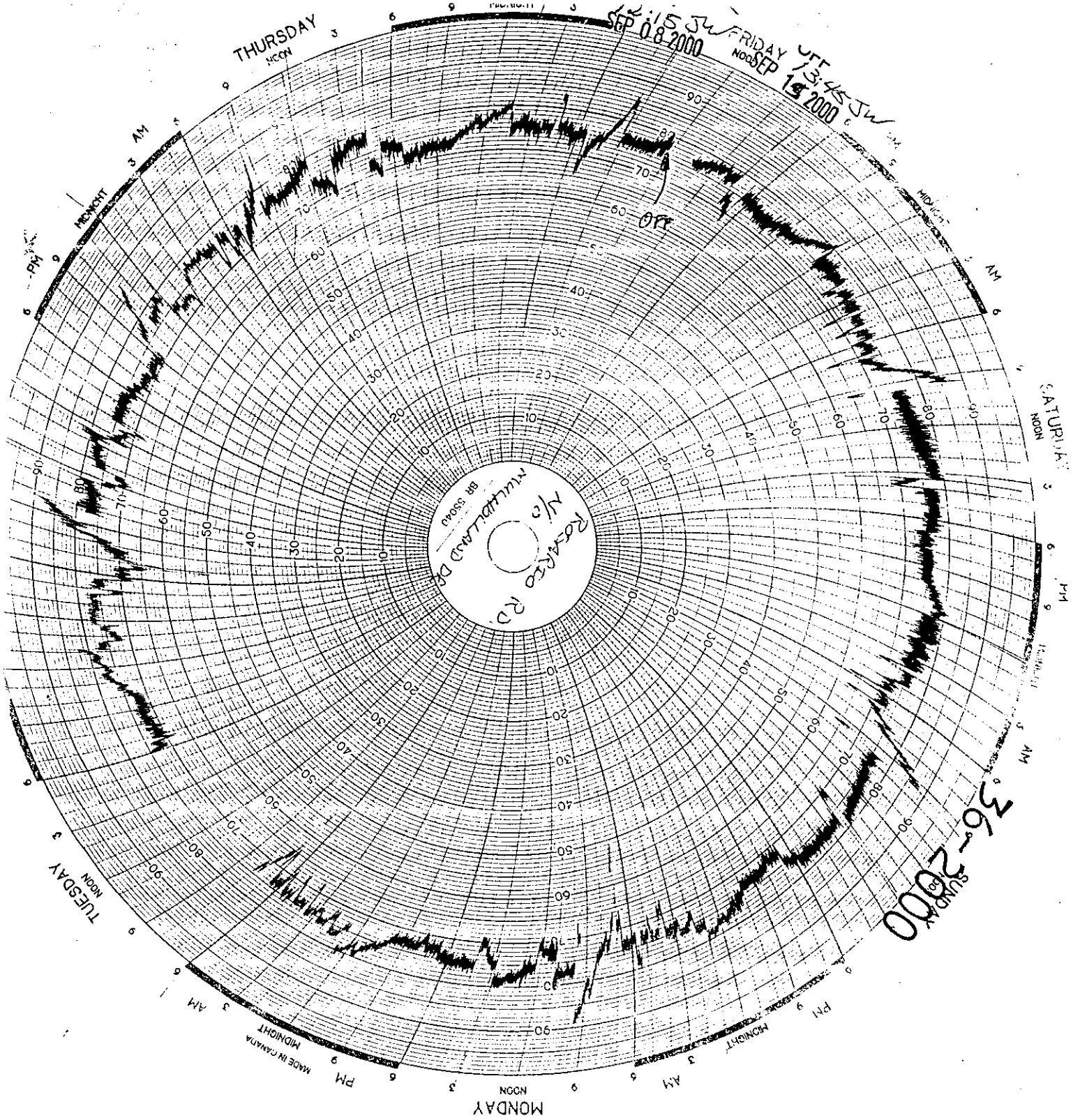
F-73873: Located at 4219 Rosario Road

8/18 to 8/25/00



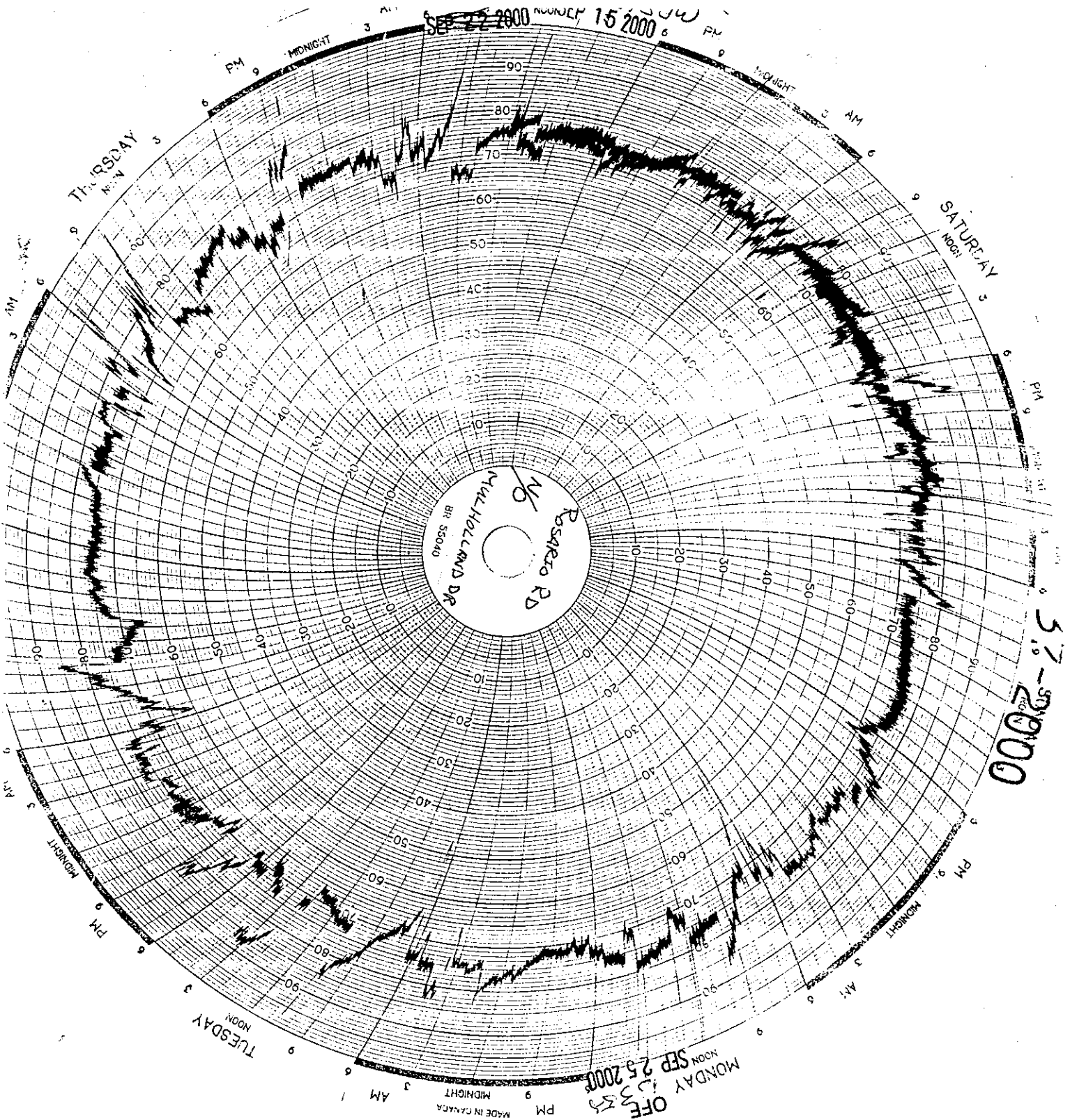
F-73873: Located at 4219 Rosario Road

9/1 to 9/8/00



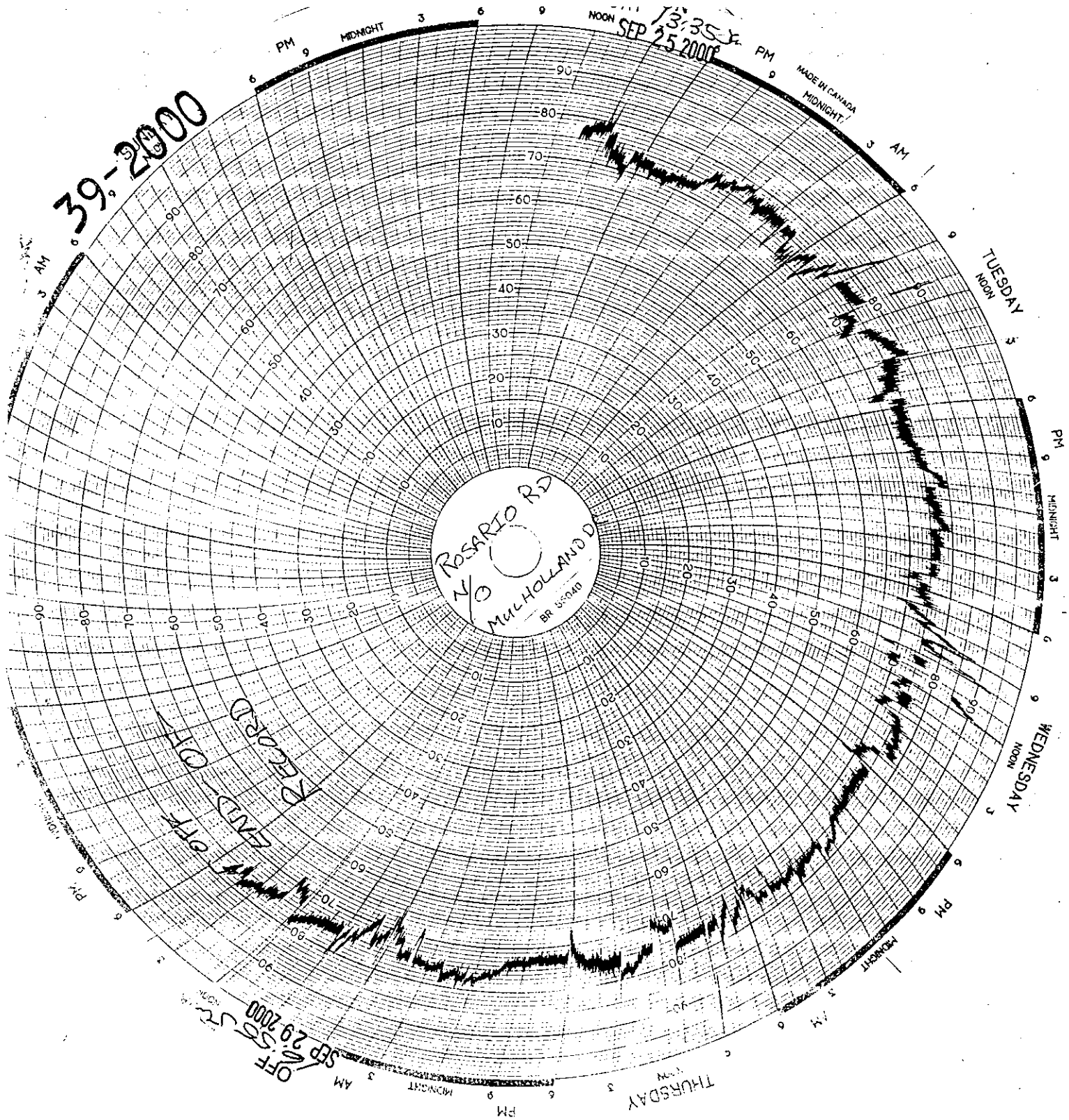
F-73873: Located at 4219 Rosario Road

9/8 to 9/15/00



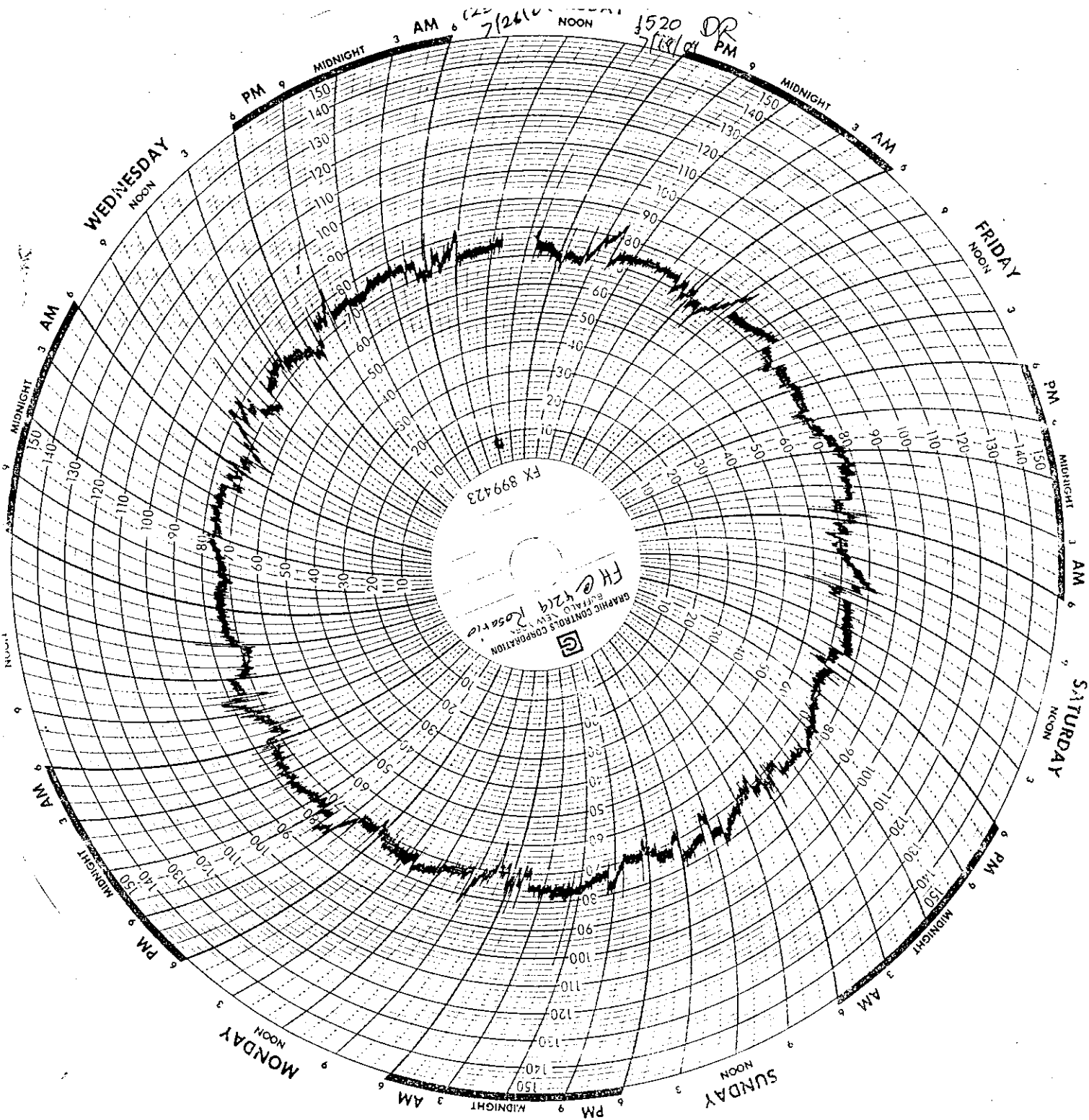
F-73873: Located at 4219 Rosario Road

9/15 to 9/22/00



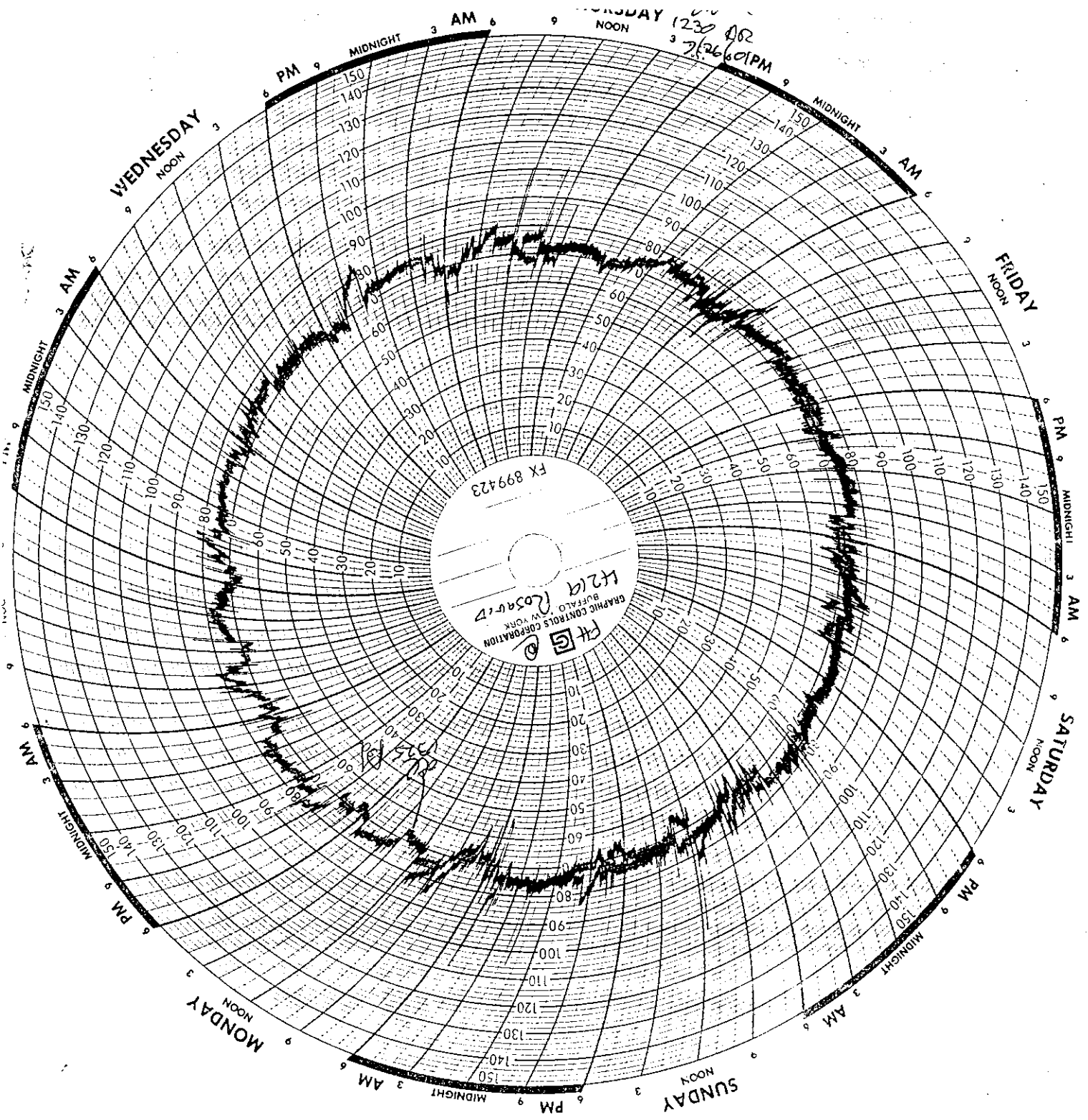
F-73873: Located at 4219 Rosario Road

HYDRANT 4219 ROSARIO ROAD
07/18/01 – 08/13/01



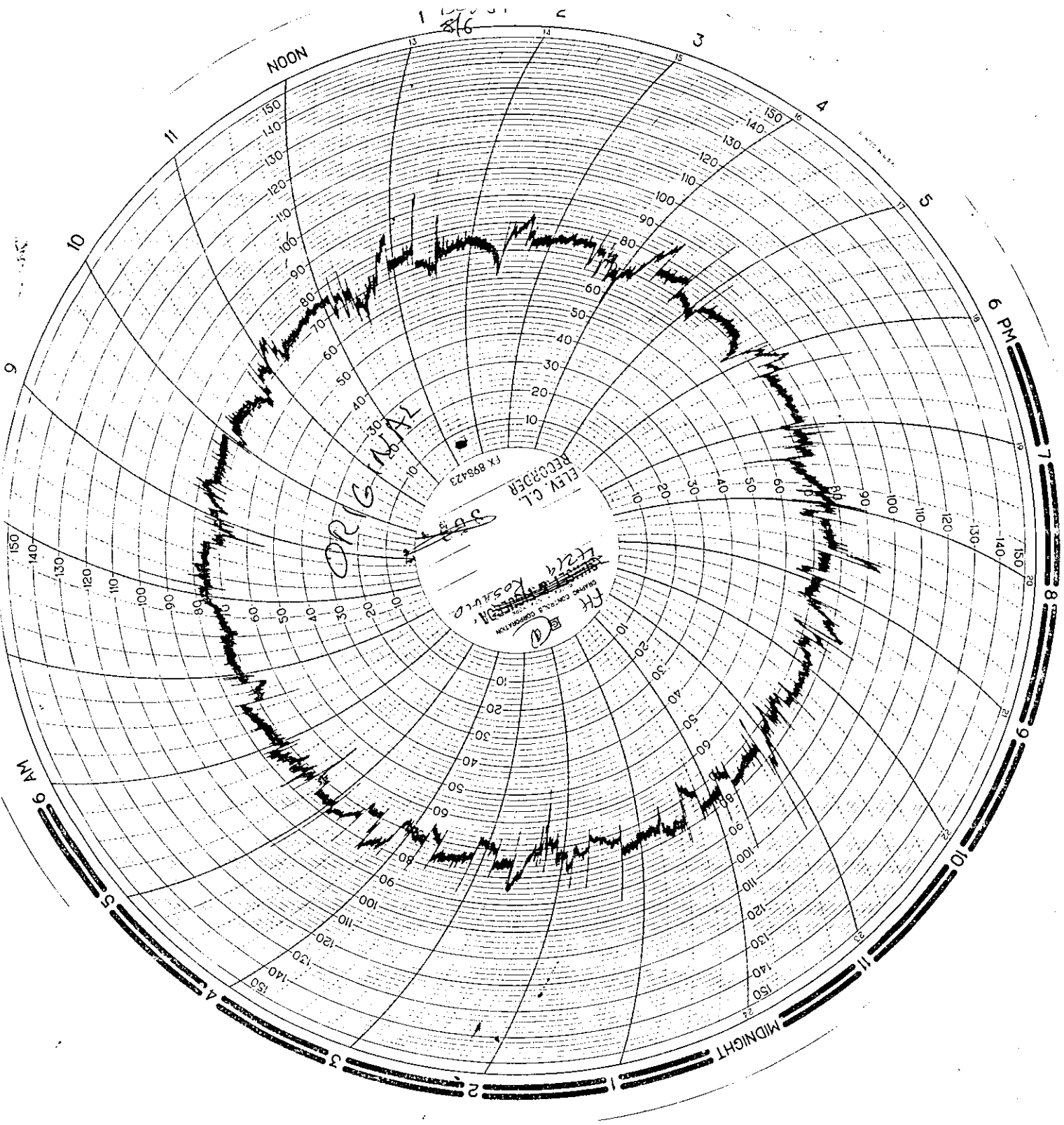
F-73873: Located at 4219 Rosario Road

10/9/11 or 7/18/01



F-73873: Located at 4219 Rosario Road

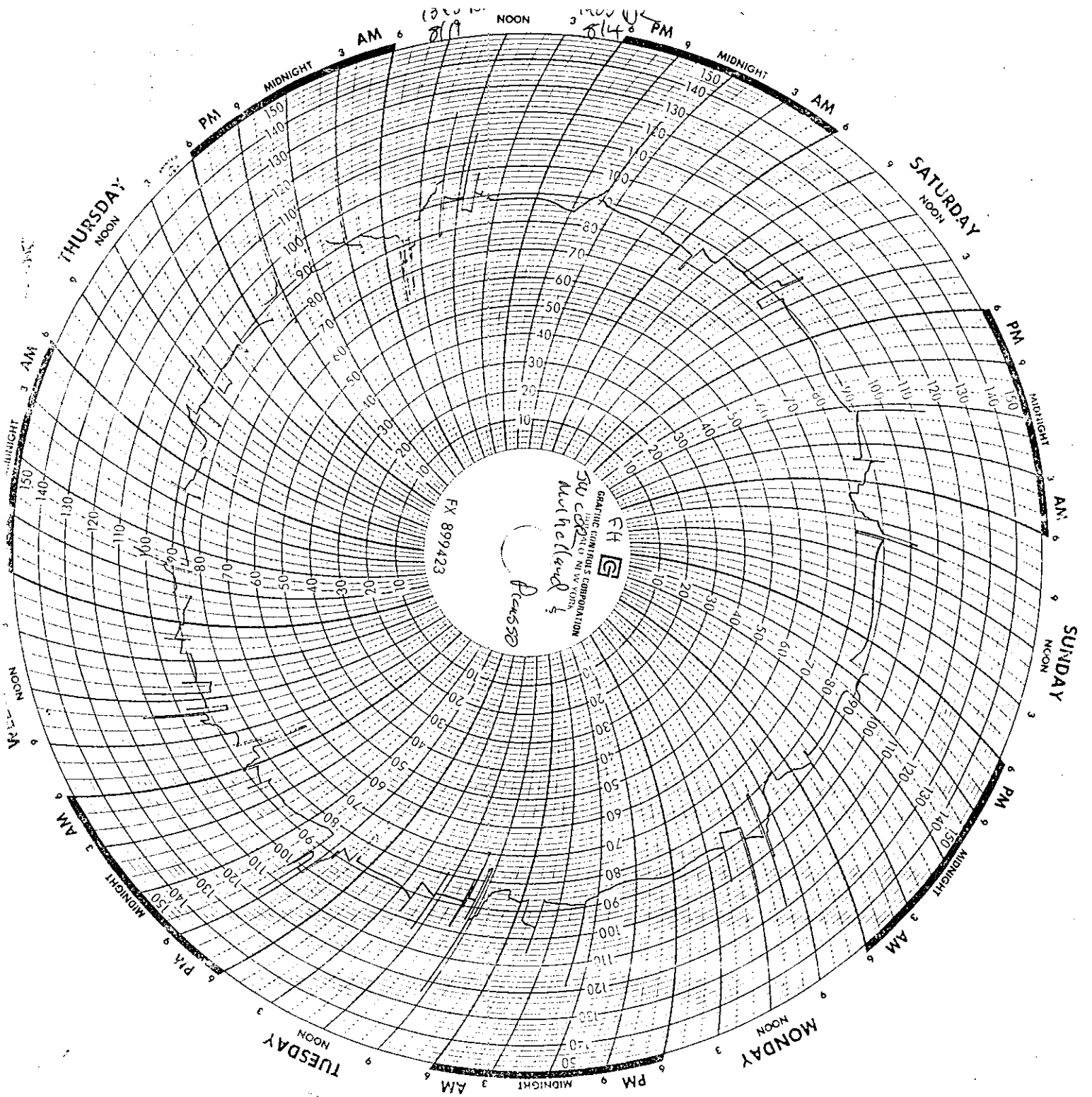
7/26 to 8/2/01



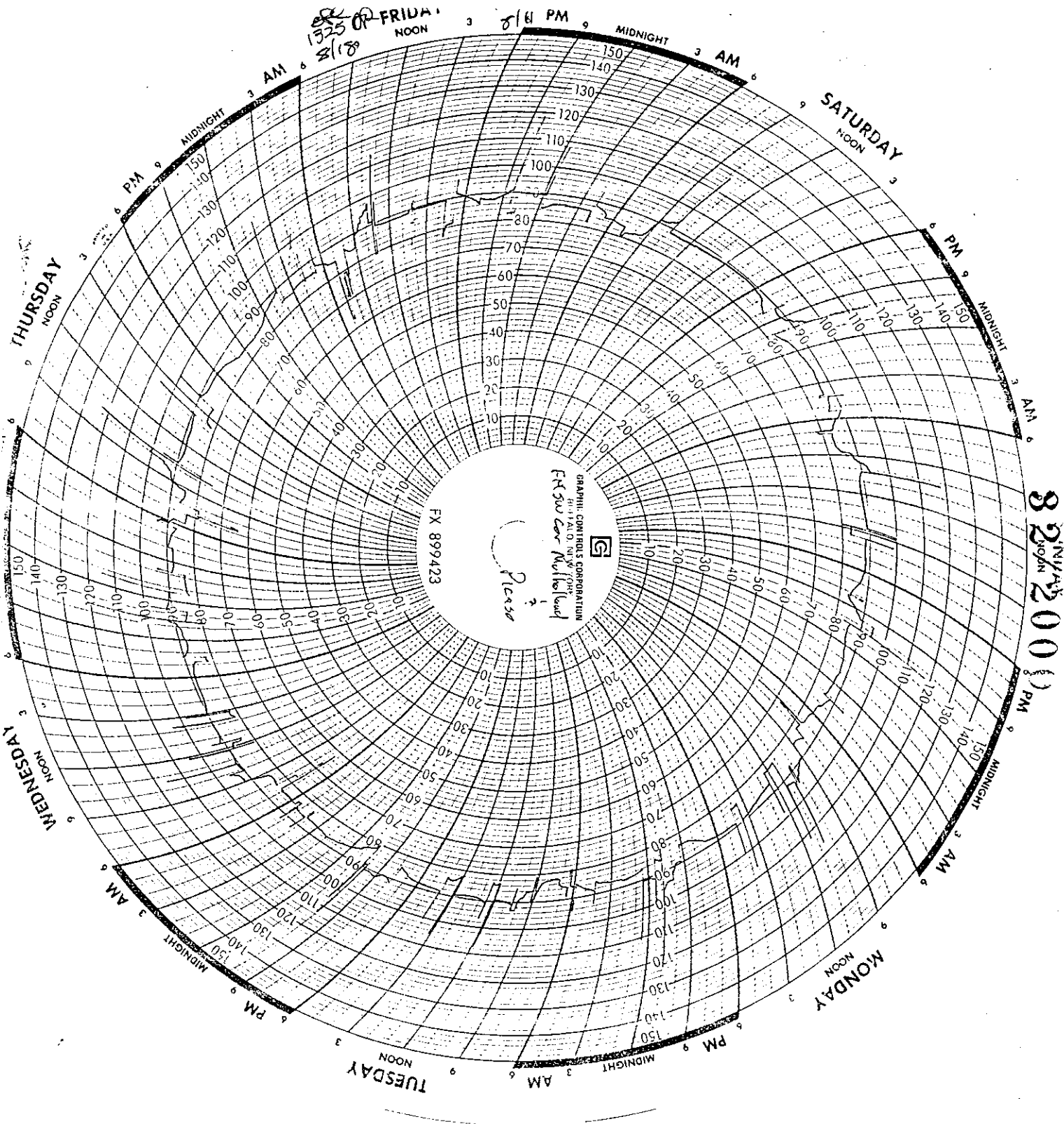
F-73873: Located at 4219 Rosario Road

8/6 to 8/13/01

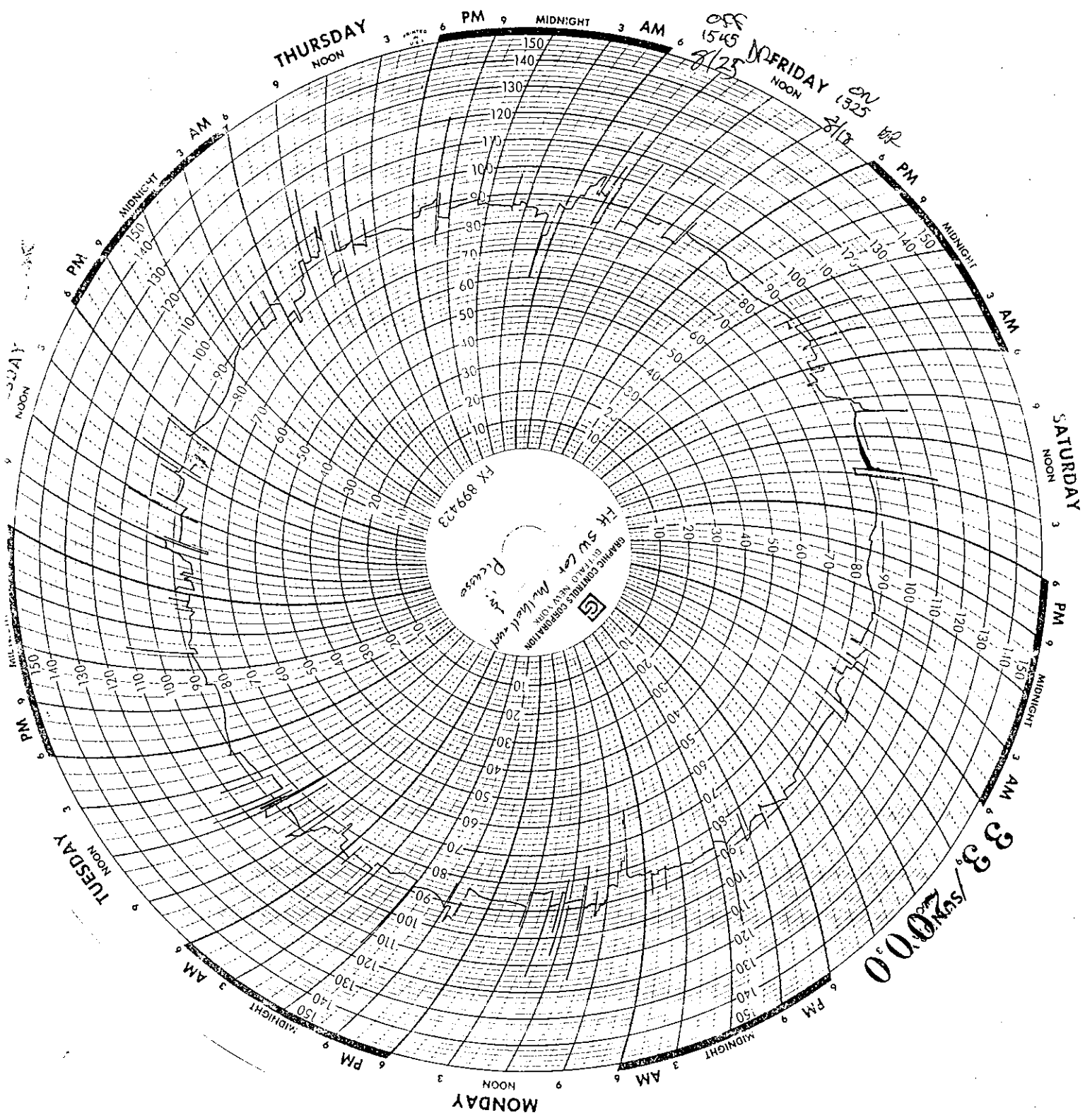
HYDRANT MULHOLLAND DRIVE AND
PICASSO AVENUE
08/04/00 – 09/29/00



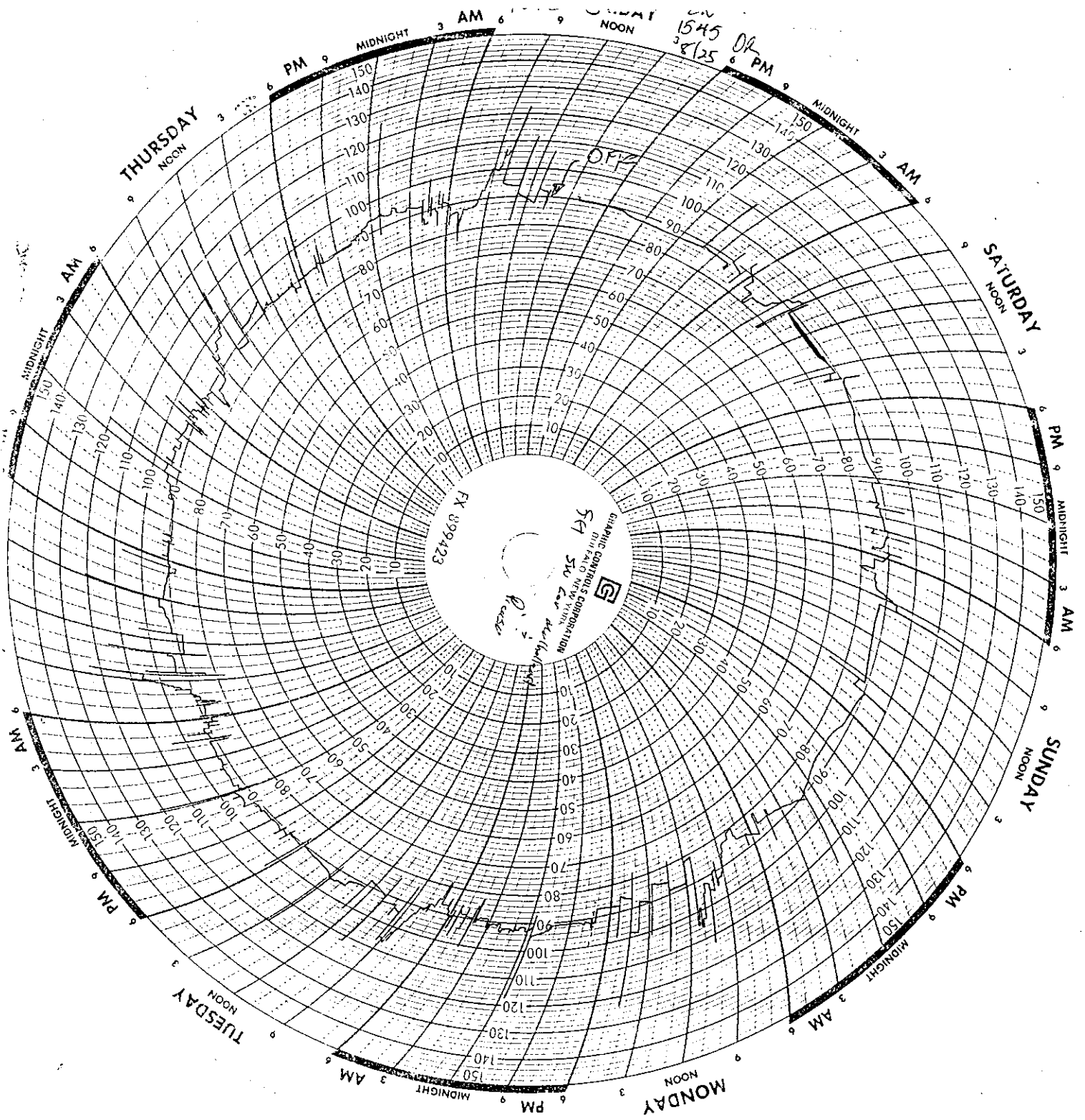
F-50497: Located on Mulholland Drive at Picasso Avenue



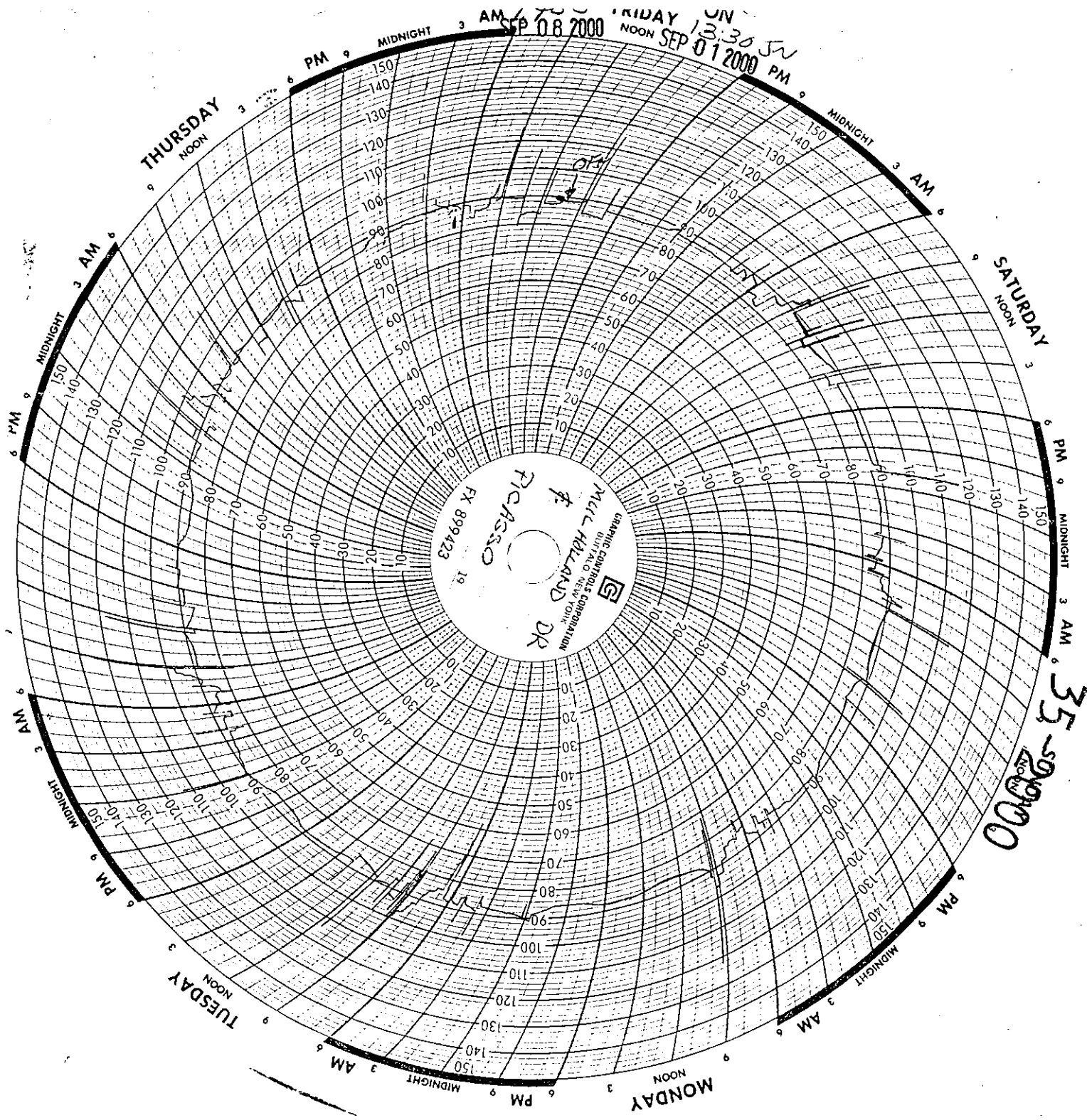
F-50497: Located on Mulholland Drive at Picasso Avenue



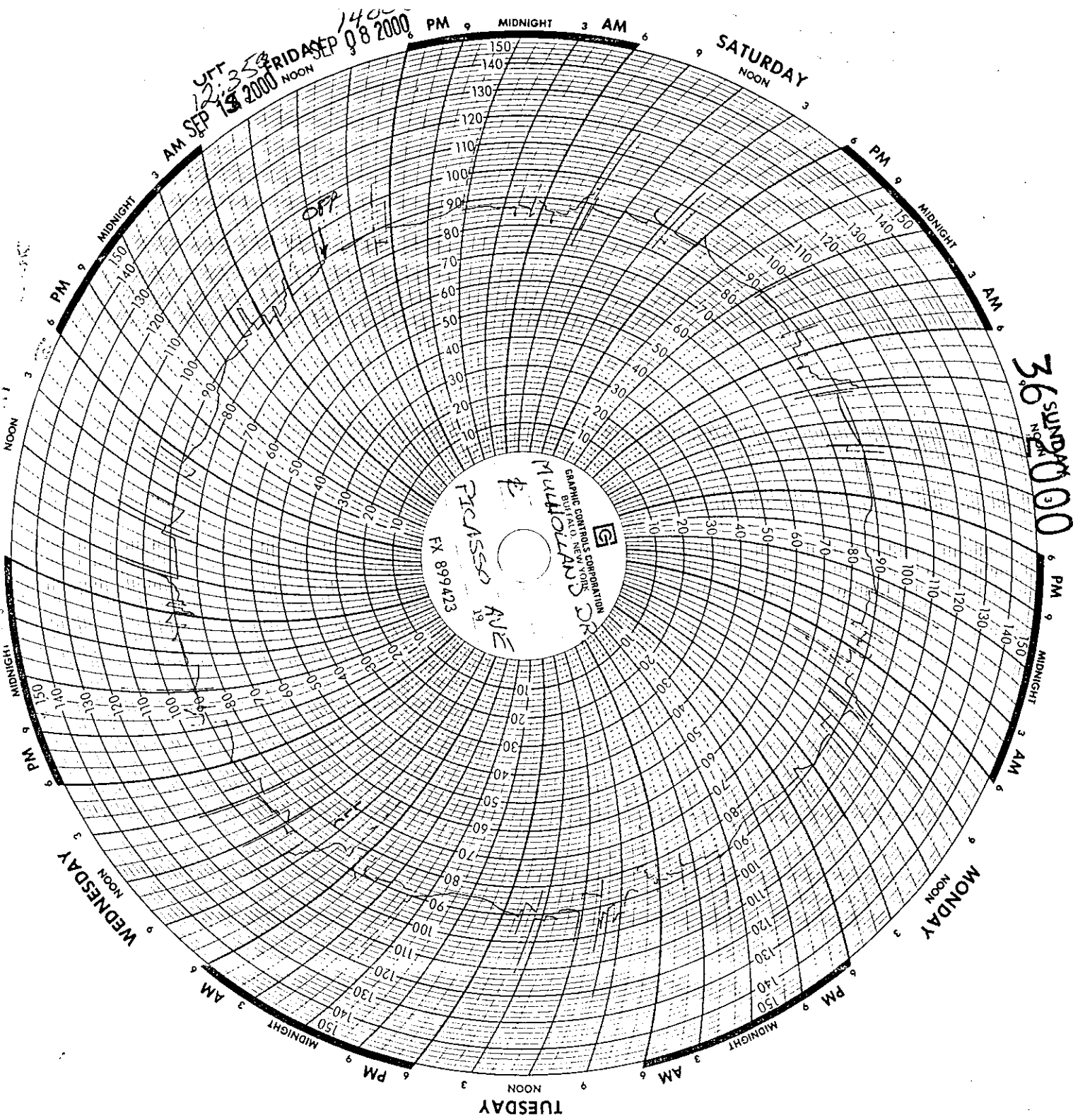
F-50497: Located on Mulholland Drive at Picasso Avenue



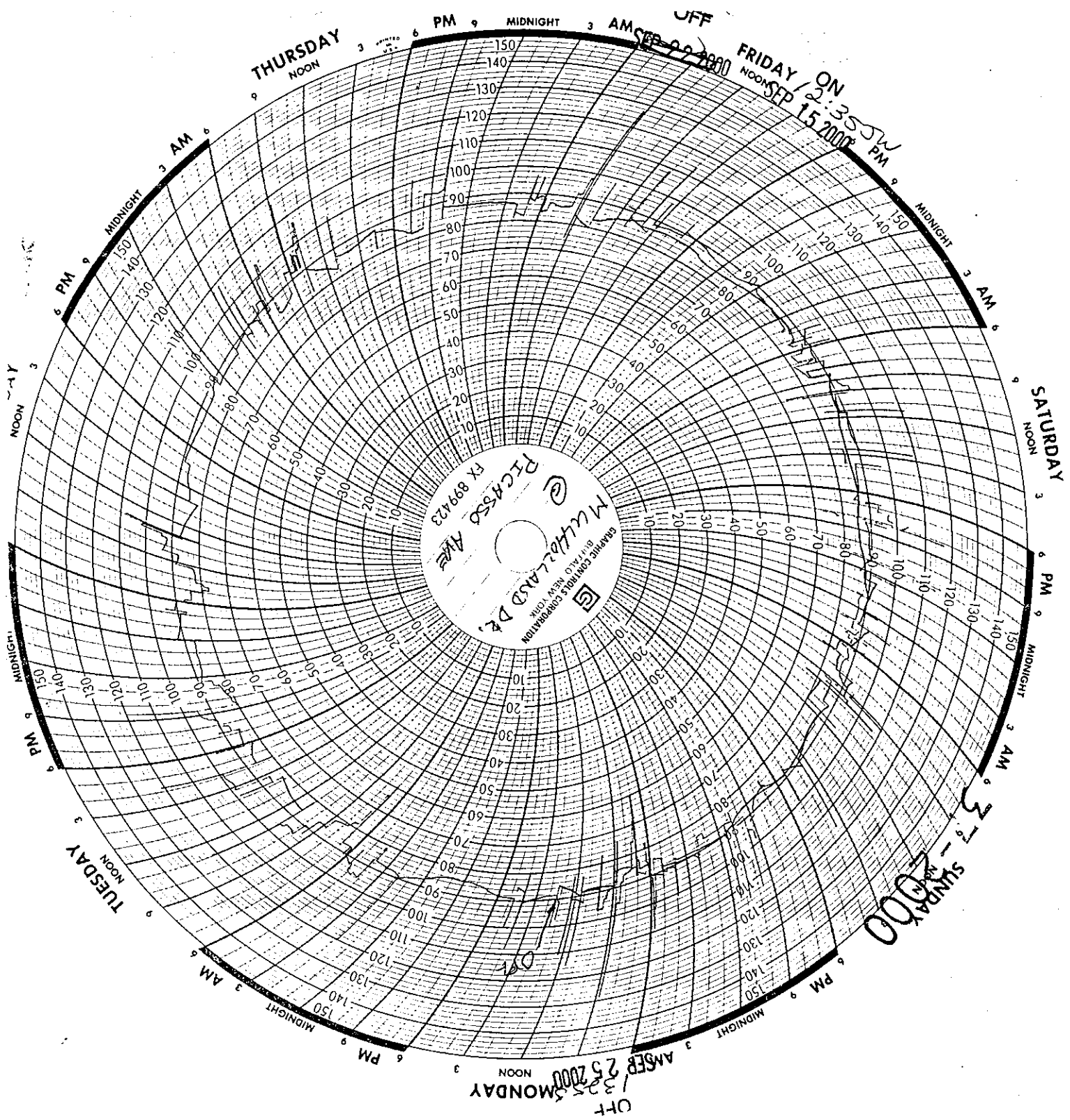
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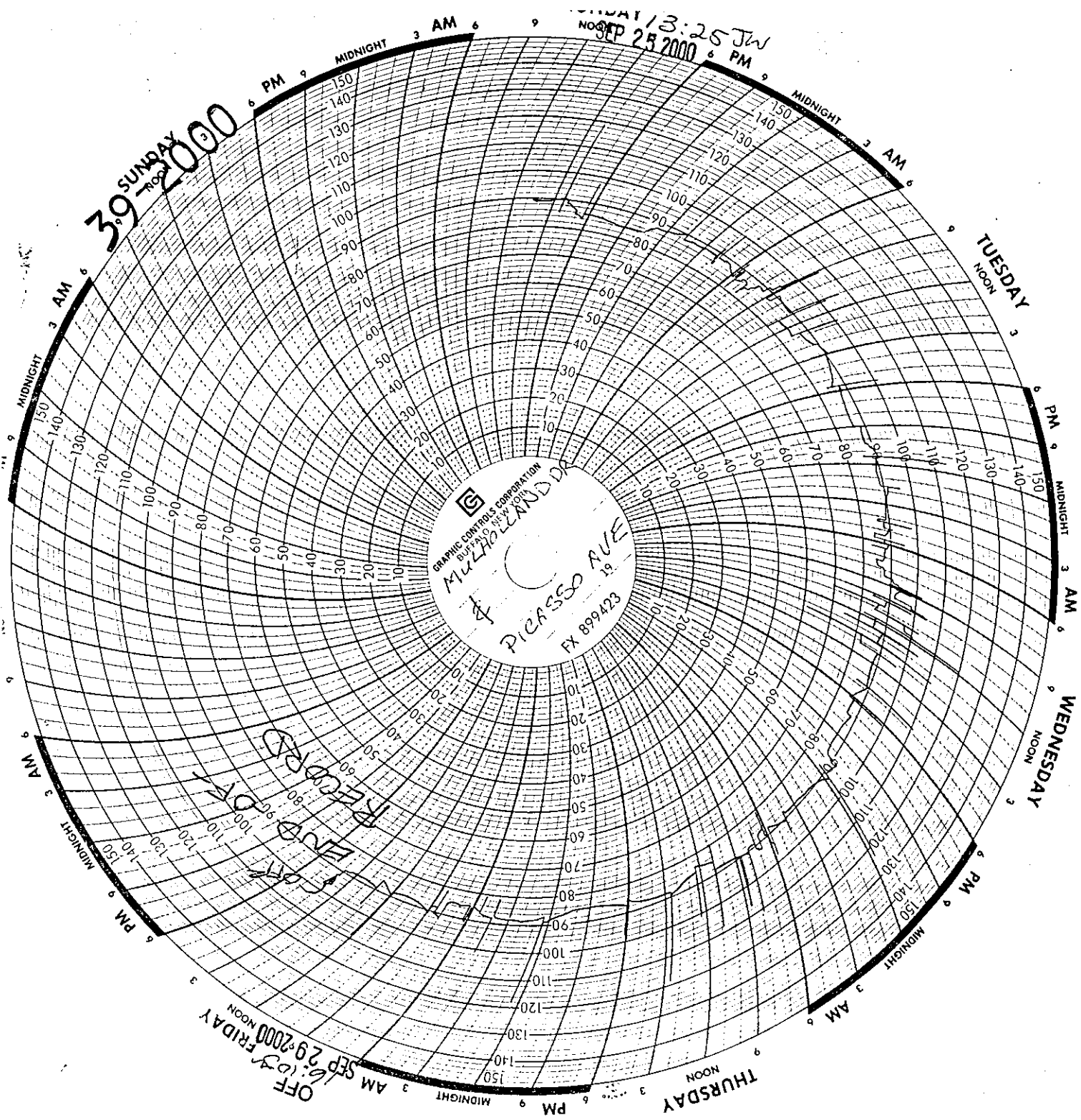
F-50497: Located on Mulholland Drive at Picasso Avenue



F-50497: Located on Mulholland Drive at Picasso Avenue

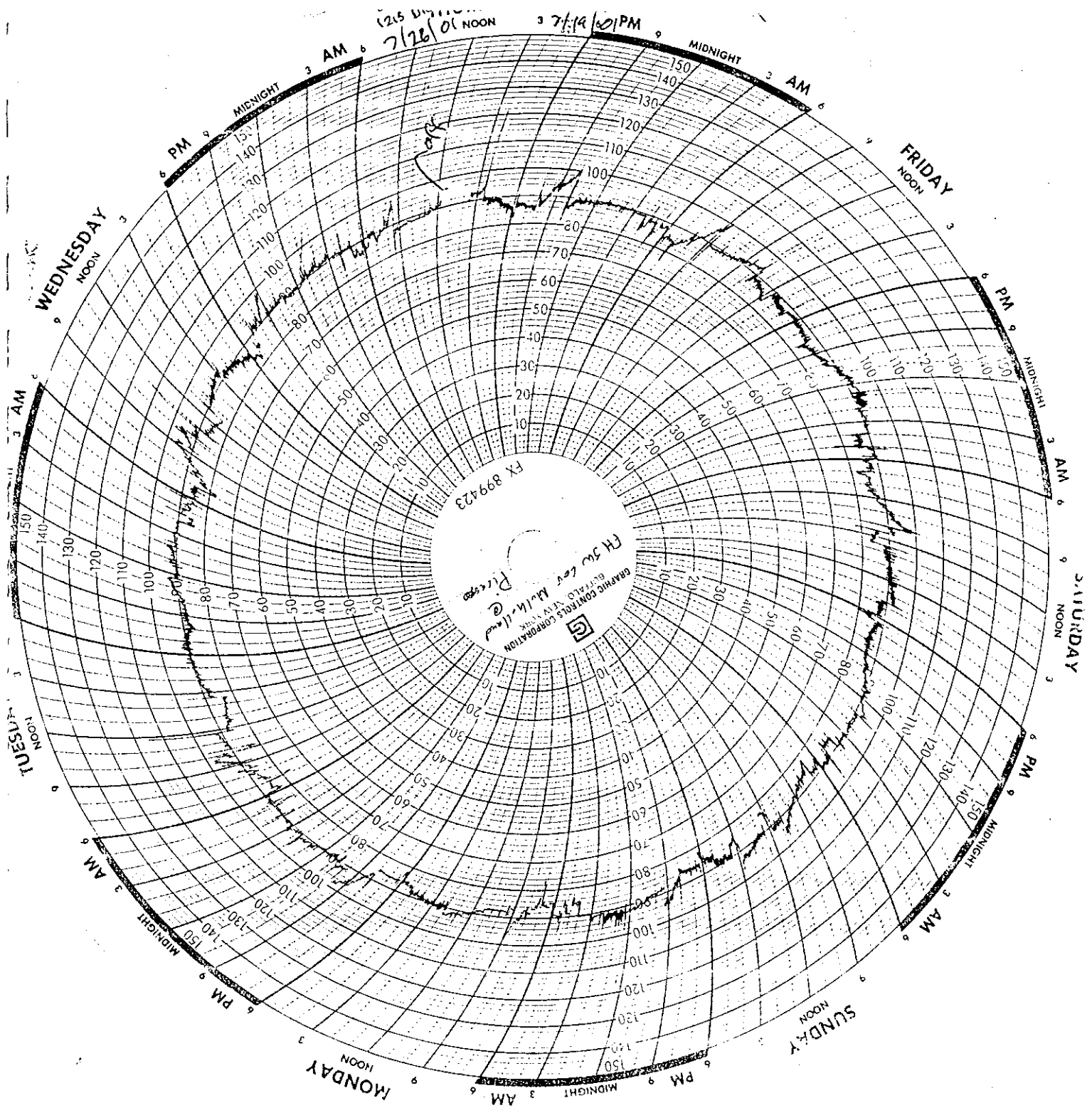


F-50497: Located on Mulholland Drive at Picasso Avenue

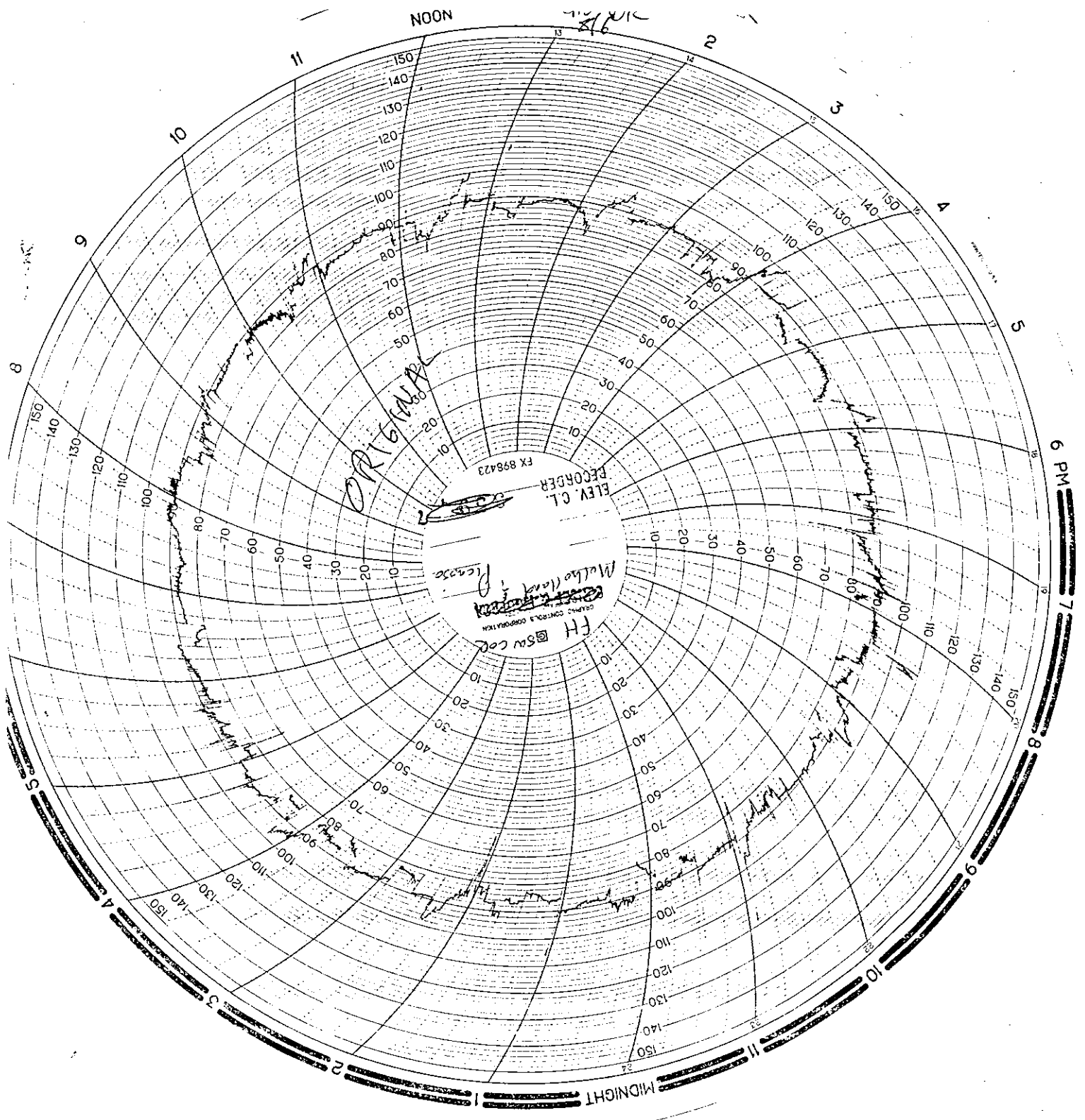


F-50497: Located on Mulholland Drive at Picasso Avenue

HYDRANT MULHOLLAND DRIVE AND
PICASSOR AVENUE
07/18/01 – 08/13/01



F-50497: Located on Mulholland Drive at Picasso Avenue



F-50497: Located on Mulholland Drive at Picasso Avenue