

Appendix A

Notice of Preparation and Comment Letters



ERIC GARCETTI
Mayor

Commission
THOMAS S. SAYLES, *President*
ERIC HOLOMAN, *Vice President*
RICHARD F. MOSS
CHRISTINA E. NOONAN
JONATHAN PARFREY
BARBARA E. MOSCHOS, *Secretary*

RONALD O. NICHOLS
General Manager

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SEP 05 2013

NOTICE OF PREPARATION

LOS ANGELES, COUNTY CLERK

DATE: September 6, 2013

TO: State Clearinghouse, Affected Agencies, Organizations and Interested Persons

SUBJECT: Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the Los Angeles Groundwater Replenishment Project

LEAD AGENCY: Los Angeles Department of Water and Power

The City of Los Angeles Department of Water and Power (LADWP) will be the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and will prepare an Environmental Impact Report (EIR) for the proposed Los Angeles Groundwater Replenishment Project (LAGWR, proposed project). The proposed project involves construction of an advanced water purification facility (AWPF) that would perform additional treatment of tertiary effluent (Title 22 treated recycled water) from the existing Donald C. Tillman Water Reclamation Plant (DCTWRP). Purified recycled water would be transported to the Hansen Spreading Grounds (HSG), Pacoima Spreading Grounds (PSG), and Hansen Tank at LADWP's Valley Generating Station (VGS) using existing and proposed new conveyance pipelines. Groundwater replenishment would be accomplished by spreading purified recycled water at the HSG and PSG, and by injecting purified recycled water using proposed new injection wells located along Canterbury Avenue near the PSG to increase groundwater recharge of the San Fernando Groundwater Basin (SFB). LADWP is requesting input from individuals, stakeholders, organizations, and agency representatives that may be interested in the proposed project as to the scope and content of the environmental information to be included in the project EIR.

PROJECT DESCRIPTION

Under the proposed project, an AWPF would be constructed within the DCTWRP to treat secondary or tertiary effluent produced by the DCTWRP using advanced treatment technology. AWPF purified recycled water would be conveyed to the spreading grounds using an existing pipeline that currently conveys Title 22 recycled water from DCTWRP and the Balboa Pump Station to the Hansen Tank at VGS. However, portions of the pipeline would need to be modified to reach the PSG. A new lateral transmission pipeline, approximately 10,000 linear feet in length, would be constructed and installed to tie in to an existing pipeline at Branford Street northwest along Canterbury Avenue to the PSG. The existing 7 million gallon (MG) recycled water storage tank (Hansen Tank) at VGS would also be connected to the purified recycled water distribution system.

LADWP could recharge up to 35,000 AFY of purified recycled water at the HSG, and up to 23,000 AFY of purified recycled water at the PSG, based on the availability of supply and the annual capacity

Water and Power Conservation ... a way of life

111 North Hope Street, Los Angeles, California 90012-2607 Mailing address: Box 51111, Los Angeles 90051-5700
Telephone: (213) 367-4211 Cable address: DEWAPOLA

Recyclable and made from recycled waste.



of both spreading grounds. However, LADWP estimates that an average of 15,000 AFY of purified recycled water would be recharged at both the HSG and the PSG. To provide maximum operational flexibility, LADWP proposes to construct up to 13 injection wells along Canterbury Avenue to allow for direct injection of purified recycled water into the SFB for use when the Hansen and Pacoima spreading grounds are being used exclusively for stormwater management.

PROJECT LOCATION

The proposed project would be located in the eastern San Fernando Valley of the City of Los Angeles, in Los Angeles County, California. The DCTWRP is located at 6100 Woodley Avenue, in the Van Nuys community of the City of Los Angeles. The property is owned by the U.S. Army Corps of Engineers (USACE) and is operated by the City of Los Angeles Bureau of Sanitation (BOS). Groundwater recharge into the SFB is primarily achieved through existing spreading grounds in the San Fernando Valley operated by the County of Los Angeles Department of Public Works. The HSG is located in the Sun Valley community of the City of Los Angeles and is bordered by Branford Street to the northwest, Sheldon Street to the southeast, San Fernando Road to the southwest, and Glenoaks Street to the northeast. The PSG is located in the Pacoima community of the City of Los Angeles and is bordered by Arleta Avenue to the northwest, Filmore Street to the southeast, Woodman Avenue to the southwest, and San Jose Street to the northwest. Title 22 recycled water is stored at VGS, in the Hansen Tank, which is located at 11801 Sheldon Street in the Sun Valley community of the City of Los Angeles, adjacent to the HSG.

POTENTIAL ENVIRONMENTAL EFFECTS

The potential environmental effects of the proposed project to be addressed in the Draft EIR will include, but may not be limited to, the following:

- Aesthetics and Visual Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

PUBLIC COMMENT PERIOD

The 45-day public comment period for this NOP will commence on September 6, 2013, and conclude on October 21, 2013. Copies of the Initial Study will be available for review on the LADWP website at <http://www.ladwp.com/envnotices> and at the following locations:

LADWP, Environmental Affairs Division
111 North Hope Street, Room 1044
Los Angeles, CA 90012

West Valley Regional Branch Public Library
19036 Vanowen Street
Reseda, CA 91335

Encino-Tarzana Branch Library
18231 Ventura Boulevard
Tarzana, CA 91356

Van Nuys Branch Public Library
6250 Sylmar Avenue
Van Nuys, CA 91401

Sherman Oaks Library
14245 Moorpark Street
Sherman Oaks, CA 91423

Panorama City Branch Public Library
14345 Roscoe Boulevard
Panorama City, CA 91402

Lake View Terrace Library
12002 Osborne Street
Sylmar, CA 91342

Valley Plaza Branch Public Library
12311 Vanowen Street
North Hollywood, CA 91605

Pacoima Branch Library
13605 Van Nuys Boulevard
Pacoima, CA 91331

Mid-Valley Regional Branch Library
16244 Nordhoff Street
North Hills, CA 91343

Sun Valley Library
7935 Vineland Avenue
Sun Valley, CA 91352

Please submit comments in writing, by fax or email, to the address provided below **no later than 5:00 p.m. on October 21, 2013.**

Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012
Attn.: Michael Mercado
Fax: (213) 367-4710
Email: Michael.Mercado@ladwp.com

The following information would be useful to include in your response:

- For all respondents, please provide contact information and identify the environmental information and issues that you believe should be addressed in the EIR, including any suggested alternatives to the proposed project.
- For agency respondents, please provide the name of the contact person for your agency, mailing address, e-mail, and telephone number. List any permit(s) or approval(s) under your agency's authority, as well as any reasonably foreseeable projects, programs, or plans that may have an overlapping influence with the proposed project.

For any questions regarding this NOP, please contact Mr. Michael Mercado at (213) 367-0395.

PUBLIC MEETINGS

Three public meetings will be held during the scoping period to solicit input from interested parties on the proposed content of the Draft EIR. The meetings will be held at the following locations and times:

Wednesday, September 25, 2013 at 7:00 pm
Sepulveda Garden Center, 16633 Magnolia Boulevard, Los Angeles, CA 91436

Thursday, October 3, 2013 at 7:00 pm
Canterbury Elementary School, 13670 Montague Street, Arleta, CA 91331

Saturday, October 12, 2013 at 10:00 am
LADWP, 111 North Hope Street, A-Level Cafeteria Conference Room, Los Angeles, CA 90012

Charles C. Holloway
Signature

Charles C. Holloway
Manager of Environmental Planning and Assessment
Los Angeles Department of Water and Power

LOS ANGELES GROUNDWATER REPLENISHMENT PROJECT - SCOPING MEETING
SEPTEMBER 25, 2013

City of Los Angeles Department of Water and Power
City of Los Angeles Department of Public Works

Name B. Stollow
Representing STAKE HOLDER
Address 1757 ROSCOMBE RD
City LA Zip 90077
 Please add me to the mailing list

Name ELAINE BERRY
Representing _____
Address 4914 ANDASOL
City ENCINO Zip 91316
 Please add me to the mailing list

Name Paul Berg
Representing _____
Address 4914 ANDASOL
City ENCINO Zip 91316
 Please add me to the mailing list

Name Judith Hirschberg
Representing Japanese Garden
Address 6521 Orion Ave
City Van Nuys Zip 91406
 Please add me to the mailing list

Name KEN MURRAY
Representing _____
Address 4511 CAMELLIA AVE
City N. Hollywood Zip 91602
 Please add me to the mailing list

Name _____
Representing _____
Address _____
City _____ Zip _____
 Please add me to the mailing list

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Representing _____
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Representing _____
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Name _____
Representing _____
Address _____
City _____ Zip _____
 Please add me to the mailing list

LOS ANGELES GROUNDWATER REPLENISHMENT PROJECT - SCOPING MEETING
SEPTEMBER 25, 2013

City of Los Angeles Department of Water and Power
City of Los Angeles Department of Public Works

Name Dr Tom Williams
Representing SC-AC Water Comte
Address 417 Barnett Rd
City LA Zip 90032-1712
 Please add me to the mailing list

Name Esther Levy
Representing Public
Address 5419 Murietta Ave
City S.U Zip 91401
 Please add me to the mailing list

Name GERARD A SILVER
Representing HOMB
Address PO 260245
City CA Zip 91436
 Please add me to the mailing list

Name Glenn Bailey
Representing Encino Neighborhood Council
Address PO Box 19172
City Encino Zip 91416
 Please add me to the mailing list

Name ARTHUR HIRSBERG
Representing JAPANESE GARDEN
Address 6521 ORION AVE
City VAN NUYS Zip 91406
 Please add me to the mailing list

Name _____
Representing _____
Address _____
City _____ Zip _____
 Please add me to the mailing list

Name _____
Representing _____
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Name _____
Representing _____
Address _____
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 Please add me to the mailing list

Name _____
Representing _____
Address _____
City _____ Zip _____
 Please add me to the mailing list

Speaker Form

Name: Paul Berg
Organization: _____
(Please print clearly)

Comments will be limited to 3 minutes.

Speaker Form

Name: GERALD A. SKUER
Organization: HOME OWNERS OF ENCLAVE
(Please print clearly)

Comments will be limited to 3 minutes.

Speaker Form

Name: Dr Tom Williams
Organization: SC-AC-Waterford
(Please print clearly)

Comments will be limited to 3 minutes.

Speaker Form

Name: BARBARA SHELLON
Organization: STAKE HOLDER
(Please print clearly)

Comments will be limited to 3 minutes.

Meeting Notes	
Project Name	Los Angeles Groundwater Replenishment Project (GWR)
Meeting Subject	Scoping Meeting Comments
Meeting Location	Sepulveda Garden Center, Encino
Meeting Date	September 25, 2013

These meeting minutes are the best recollection of the writer and will stand as is unless comments are received within five business days of issuance.

Commenter	Comment Received
Dr. Tom Williams Sierra Club	<ul style="list-style-type: none"> - Project being segmented between indirect and direct impacts. Where will the water go after it is put into the groundwater basin? Where will the water be taken out? If this is additional water, where does the unused water go? What is the indirect inducted growth? - Where will the brine discharge go and what will be the impact of the salt on the County's wastewater disposal facilities? - Suggest having more Spanish language materials at the other scoping meetings. - Please provide the scoping report prior to the release of the Draft EIR. - What are the project alternatives to be evaluated in the Draft EIR? - Please provide a draft of the Mitigation Monitoring and Reporting Program as part of the Draft EIR instead of making the public wait until the Final EIR. - Provide groundwater modeling as part of the Draft EIR. Why can't LADWP inject the water into the groundwater basin near the Donald C. Tillman Water Reclamation Plant and the proposed project site near the Sepulveda Basin Recreation Area instead of pumping the water up to the Pacoima and Hansen Spreading Grounds and injecting near the spreading grounds? - How much will the project cost? Who will pay for the project – existing or future ratepayers? How will these increase water rates? Will other LADWP facilities be decommissioned or neglected because funds will be allocated to this project?

<p>Gerald Silver Encino Homeowners Association</p>	<ul style="list-style-type: none"> - The project and the Draft EIR need to include a clearer description of purified recycled water. The public needs to understand that this is highly purified effluent or sewage water. The toilet to tap concept needs to be made clear. - Ratepayers should have the opportunity to vote on the project and be the group to decide if the City's wants this project. - How much does recycled water cost? An economic analysis of the cost of the project should be included in the Draft EIR. - Recycled water is a driving force behind growth and development in Los Angeles. Constraints on infrastructure are the only way to control unchecked growth. This project will allow further growth. - What is the cost per acre foot for advanced treated water? How does that compare per acre foot to Colorado River water or Aqueduct water? - If highly treated water is so good, why can't LADWP pump it directly into the drinking water system? - How were announcements made for this meeting? - Will specific outreach be conducted to every ratepayer to ask if it is acceptable to use purified recycled water as part of the local supply? I suggest using the mailer within the water bill to get the word out about the project.
<p>Barbara Shellow</p>	<ul style="list-style-type: none"> - The City desperately needs reclaimed water and the Japanese Gardens volunteers strongly in favor of the use of reclaimed water. - The Japanese Gardens volunteers have worked with LADWP and looked at five potential sites for the proposed facility so we are surprised that LADWP is only going to consider two of the five sites in the EIR. LADWP has already violated CEQA and gone back on a promise made to us over the summer. - The proposed project site is the worst site location within the Tillman property and will have the greatest impact on the Japanese Gardens. Putting an industrial facility next to children playing the Recreation Area is not a good idea. - The U.S. Army Corps of Engineers owns the Donald C. Tillman property and may not let any project occur on its property. - The Contractor Laydown Area would be the perfect location within the Tillman property. It is undeveloped, but previously disturbed, meets the elevation criteria, and would not require a relocation of existing facilities. - I invite everyone to see the Japanese Gardens and then they will understand why the volunteers prefer the site at the Valley Generating Station. - This is a hugely expensive project and will require a lot of approvals from different agencies before it can be built.

<p>Paul Berg</p>	<ul style="list-style-type: none">- Table 7.3 in the water recycling packet shows that the Contractor Laydown site has 14 firsts, but the preferred site only have 4 firsts.- The proposed buildings will impinge upon the Japanese Gardens.- Site #2 will cost \$338 million, which I believe underestimates the cost, but the cost drops to \$316 million at the Contractor Laydown site. Why isn't there a higher emphasis on the Contractor Laydown site?
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LOS ANGELES GROUNDWATER REPLENISHMENT PROJECT - SCOPING MEETING
OCTOBER 3, 2013

City of Los Angeles Department of Water and Power
City of Los Angeles Department of Public Works

Name Judy Motion
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Name Pamela Bonilla
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Name Wayne Gaudert
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Name _____
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Name Bob Peppermuller
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Name Mark Lopez
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Address 14131 Green St. N
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Name _____
Representing _____
Address _____
City _____ Zip _____
Email _____
 Please add me to the mailing list

Name JACK LINDBLAD
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 Please add me to the mailing list

Name _____
Representing _____
Address _____
City _____ Zip _____
Email _____
 Please add me to the mailing list

LOS ANGELES GROUNDWATER REPLENISHMENT PROJECT - SCOPING MEETING
OCTOBER 3, 2013

City of Los Angeles Department of Water and Power
City of Los Angeles Department of Public Works

Name Matthew Kearns
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Address _____
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 Please add me to the mailing list

Name ERIC AGUILAR
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 Please add me to the mailing list

Name _____
Representing _____
Address _____
City _____ Zip _____
Email _____
 Please add me to the mailing list

Name _____
Representing _____
Address _____
City _____ Zip _____
Email _____
 Please add me to the mailing list

Name _____
Representing _____
Address _____
City _____ Zip _____
Email _____
 Please add me to the mailing list

Name GEOFF CARTHEN
Representing MWD
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City MONROVIA Zip 91016
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 Please add me to the mailing list

Name Gary Aggas
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 Please add me to the mailing list

Name _____
Representing _____
Address _____
City _____ Zip _____
Email _____
 Please add me to the mailing list

Name _____
Representing _____
Address _____
City _____ Zip _____
Email _____
 Please add me to the mailing list

Name _____
Representing _____
Address _____
City _____ Zip _____
Email _____
 Please add me to the mailing list

Speaker Form

Name: KEN MURRAY
Organization: HOMEOOWNER
(Please print clearly)

Comments will be limited to 3 minutes.

Speaker Form

Name: BOB PEPPERMULLER
Organization: MID-TOWN NORTH
HOLLYWOOD
NIGHT BOARD
(Please print clearly)

Comments will be limited to 3 minutes.

CONCIL

Speaker Form

Name: ERIC AGUILAR
Organization: LADWP
(Please print clearly)

Comments will be limited to 3 minutes.

Speaker Form

Name: Mark Lopez
Organization: Arleta Neighbors
Council
(Please print clearly)

Comments will be limited to 3 minutes.

Speaker Form

Name: JACK LINDBLAD
Organization: ESFV CBE
(Please print clearly) Locally Grown Produce

Comments will be limited to 3 minutes.

Meeting Notes	
Project Name	Los Angeles Groundwater Replenishment Project (GWR)
Meeting Subject	Scoping Meeting Comments
Meeting Location	Canterbury Elementary/Magnet School, Arleta
Meeting Date	October 3, 2013

These meeting minutes are the best recollection of the writer and will stand as is unless comments are received within five business days of issuance.

Commenter	Comment Received
Mark Lopez Arleta Neighborhood Council	<ul style="list-style-type: none"> - Thank the City for reducing dependence on imported water and for using recycled water. - Live at Gruen and Canterbury so will be directly affected by the project. - Project will be located directly adjacent to residences for the 18-month construction period. - Concerned about soil degradation, liquefaction, eruption, increased seismic activity or faulting, flooding and subsidence. - What would the injection wells and pipeline look like? Need to include plan and section views. - How will this project affect the East Valley Transit Corridor? Construction of this project will occur right as the East Valley Transit Corridor construction is ending. - What will happen to the tenants of the transmission line corridor? - Should look at other sites and use other existing City facilities that are not so close to residences. - Request that LADWP attend the Arleta Neighborhood Council meetings on a quarterly basis to provide project updates. - Project materials should be provided in English and Spanish. - Request that LADWP work with the community on mitigation measures to benefit the community. - Arleta is sick of being the City's utility corridor and deserves better.

<p>Bob Peppermuller Mid-Town North Hollywood Neighborhood Council</p>	<ul style="list-style-type: none"> - If we do not go through with this project, the environmental impact in the long-term will be much greater than the construction impacts. - Predict that water will become more valuable than oil as jurisdictions fight over supply. - Need to clean up the aquifer and build up a buffer supply for dry years. - LADWP should work with the local community to minimize impacts. - Want to see the implementation schedule pushed up.
<p>Jack Lindblad East San Fernando Valley CBE</p>	<ul style="list-style-type: none"> - There is a well on my property to track the plume so to see this project to fruition after decades is gratifying. - It is important to produce accurate reports. On page 3 of the summary, the MGD and AFY numbers appear to be transposed. Units need to be kept straight and easy for the public to understand. - Have to do cleanup [of the groundwater basin] before can drill any injection wells. - Use of injection wells during the rainy season could lead to a higher groundwater table level and localized flooding, especially in extreme weather events from climate change. - Uranium in the water is five times background now so need filtration of carcinogens and radioactive hot particles for extracted water.
<p>Eric Aguilar LADWP employee</p>	<ul style="list-style-type: none"> - Groundwater rights have established limits so would this lead to an expansion of LADWP's withdrawal rights? - Would this project uplift LADWP's environmental responsibility and will there be any negative effects on the community? - Would there be a re-establishment of LADWP's production wells? - Which source would dominate the recycled water stream – imported water or stormwater? - Which type of water model will be used to evaluate the effectiveness of the project? - What is the estimated net benefit of replenishment? - Will this project affect cultural resources? - Will this project affect the U.S. Army Corps of Engineers alternatives in the new study for the Los Angeles River?

<p>Ken Murray</p>	<ul style="list-style-type: none">- Project is necessary to secure water supplies for the City.- Want to see the project go faster and be bigger.- Only two alternatives were presented tonight, but EIRs typically show a range of alternatives. Will the EIR include more alternatives?
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LOS ANGELES GROUNDWATER REPLENISHMENT PROJECT - SCOPING MEETING
OCTOBER 12, 2013

City of Los Angeles Department of Water and Power
City of Los Angeles Department of Public Works

Name Ken MURRAY
Representing _____
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Name Ken Zimmer
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Name BARBARA SHELOW
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Name Patricia Lau
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Name ANN JOB
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Name Candace Burrow
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City _____ Zip _____
Email _____
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Name Andrew Stanta
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Name Tony Wilkinson
Representing Neighborhood Councils-DWP/PAU Oversight Committee
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Email LAWILKINSON@ACH.ORG
 Please add me to the mailing list

LOS ANGELES GROUNDWATER REPLENISHMENT PROJECT - SCOPING MEETING
OCTOBER 12, 2013

City of Los Angeles Department of Water and Power
City of Los Angeles Department of Public Works

Name CATHERINE Schtick
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Email CMSchick@yahoo.com
 Please add me to the mailing list

Name MARK LOPEZ
Representing _____
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City ARLETA Zip 91331
Email _____
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Name Stephanie Magnien Rockwell
Representing Councilmember Blumenfeld
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City LA Zip 90012
Email stephanie.magnien@ac.city.org
 Please add me to the mailing list

Name _____
Representing _____
Address _____
City _____ Zip _____
Email _____
 Please add me to the mailing list

Name Joyce Dillard + Augustine Pios
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City LA Zip 90031
Email dillardjoyce@yahoo.com
 Please add me to the mailing list

Name _____
Representing _____
Address _____
City _____ Zip _____
Email _____
 Please add me to the mailing list

Name Jack Humphreys
Representing GWRP
Address _____
City _____ Zip _____
Email _____
 Please add me to the mailing list

Name _____
Representing _____
Address _____
City _____ Zip _____
Email _____
 Please add me to the mailing list

Name JOEY GURMAN
Representing _____
Address _____
City _____ Zip _____
Email _____
 Please add me to the mailing list

Name _____
Representing _____
Address _____
City _____ Zip _____
Email _____
 Please add me to the mailing list

Speaker Card

Name: Joey Gorman
Organization: _____
(Please print clearly)

Comments will be limited to 3 minutes.

Speaker Card

Name: JOCE DILLARD
Organization: _____
(Please print clearly)

Comments will be limited to 3 minutes.

Speaker Card

Name: Jack Humphreys
Organization: GW NC
(Please print clearly)

Comments will be limited to 3 minutes.

Speaker Card

Name: Candace Burrow
Organization: _____
(Please print clearly)

Comments will be limited to 3 minutes.

Speaker Card

Name: Tony Wilkinson
Organization: NC-DWP Gov Oversight Committee
(Please print clearly)

Comments will be limited to 3 minutes.

Speaker Form

Name: CATHERINE SCHICK
Organization: JAPANESE GARDEN & I
(Please print clearly)

Comments will be limited to 3 minutes.

Speaker Card

Name: KEN MURRAY
Organization: HOME OWNER
(Please print clearly)

Comments will be limited to 3 minutes.

Speaker Form

Name: BARBARA SHELOW
Organization: RATE PAYER / VOLUNTEER @ JAPANESE GARDEN
(Please print clearly)

Comments will be limited to 3 minutes.

Speaker Form

Name: DENNY SCHNEIDER
Organization: RWAG COMMITTEE
(Please print clearly)

Comments will be limited to 3 minutes.

Speaker Card

Name: Sergio Ibarra
Organization: Arleta NC
(Please print clearly)

Comments will be limited to 3 minutes.

Speaker Card

Name: Stephanie Rockwell
Organization: _____
(Please print clearly)

Comments will be limited to 3 minutes.

passed

Meeting Notes	
Project Name	Los Angeles Groundwater Replenishment Project (GWR)
Meeting Subject	Scoping Meeting Comments
Meeting Location	LADWP – Headquarters, Downtown
Meeting Date	October 12, 2013

These meeting minutes are the best recollection of the writer and will stand as is unless comments are received within five business days of issuance.

Commenter	Comment Received
Joyce Dillard	<ul style="list-style-type: none"> - Concerned about the placement of project documents. They need to be put in the Central Library and all regional libraries. - This project is creating supplies for future growth. - The Brown’s Canyon project and its water demand need to be considered. - CRA [Community Redevelopment Agency] is selling air rights to allow more density, but the City does not have the capacity for future growth. - Have not looked at Flood Control District [Los Angeles County Flood Control District, Los Angeles County Department of Public Works] and the potential for flooding to occur. - This project needs to be considered an alternative use. - Are we going to get our [water] supplies from the [Sacramento Bay] Delta? - Worried about fracking and the potential for seismicity. - People do not understand what you are doing about discharge. - Where would this water service? Universal has to find wells outside of the City. - Where is the contamination? What does that have to do with the oil wells? Water quality issues need to be addressed. - Spend a lot of time looking at how this water would be used. - Planning Department needs to be in the room. - What are the costs and who will pay?
Joey Guzman	<ul style="list-style-type: none"> - All ratepayers of LADWP need to be individually informed through their billing that sewage water would be used to inject into the ground. - This affects the water supply of the City, not just the Valley, and we have no other alternatives. - The AWPF [Advanced Water Purification Facility] would be located at the southern end of the property so if there is a breach [of the levee], this plant would be inundated. - The contractor laydown area is at the elevation of the berm. - All five sites would be carried forward according to the handout, but you are only showing two sites. LADWP needs to consider

	<p>all sites.</p> <ul style="list-style-type: none"> - DCT SW [proposed project location] only received four #1 ratings, but other locations received 14 #1 ratings. - Since all five sites are not included, the CEQA process is invalid. - All work should cease until a new CEQA process is put out.
Candace Burrow	<ul style="list-style-type: none"> - Page 2-4 of the Initial Study lists the environmental factors potentially affected. Two of the factors that are not checked were covered in the presentation. Aesthetics was not checked and was not covered in the presentation. - The project does affect aesthetics. - People will see this when they go into the [Japanese] Garden so aesthetics needs to be reviewed.
Jack Humphreyville, Greater Wilshire Neighborhood Council	<ul style="list-style-type: none"> - Nothing was mentioned about finances. How much will it cost and how will it affect water rates? - Nothing was mentioned about the purple pipe project through Elysian Park and Downtown Los Angeles. - Provide more information on the three eliminated sites.
Catherine Schick, Japanese Garden	<ul style="list-style-type: none"> - Agree with the previous commenters on points related to aesthetics. - I do not understand what happened to the three sites under consideration. - Seems that all the area will be LADWP or park. - There has been no consideration of migratory birds. - Building that will be removed are cement bunkers and there is no mention of emissions. - There is currently a problem with traffic on Woodley and construction would make this worse. - The area is like a park, but will have chemicals and industrial facilities in a park. - This project is like a done deal, but the Army Corps has yet to approve it. - LADWP is not taking into account objections to aesthetics. There is not one blade of grass so the garden will be choked by buildings. Going to make the area an LADWP compound. - The public at large has not been informed. LADWP needs to put a notice in the bill.
Tony Wilkinson, Neighborhood Council and LADWP MOU Oversight Committee	<ul style="list-style-type: none"> - Do not know why LADWP has long maintained that clean-up of the contamination is not part of the project. - Clearly going to change the flows in some ways and there is potential to push around existing contamination. - Large number of existing wells in the area of the injection wells that are already being treated with active charcoal. This may increase the clean-up costs. - Some clear relationship between groundwater recharge and clean-up. - Relationship to the Los Angeles River needs to be included. There are lots of plans for revitalization that will depend on water

	<p>that comes from DCT [Donald C. Tillman Water Reclamation Plant]. The EIR flow should be existing flow. The EIR needs to show this water for beneficial use for drinking water not for parkland.</p>
<p>Barbara Shellow, Volunteer at Japanese Garden</p>	<ul style="list-style-type: none"> - You are trying to reach the public but there were only 9 people at the Encino meeting and only the same number at the Canterbury Elementary School meeting and today 14 or so, for a total of only 31 people putting in public comment. The City knows nothing of this project and there has been no outreach. - Property under consideration is the jurisdiction of the U.S. Army Corps of Engineers and they are currently playing hardball. They are only allowing the barest minimum to occur. - Still need approval on state and federal levels. - Need to rethink this project. - I love the Japanese Garden and this project will impede on the garden. There are better places on this campus that would have less of an impact.
<p>Ken Murray</p>	<ul style="list-style-type: none"> - Congratulate the agencies involved in this forward thinking project. - Need an alternative to what happens if do not recycle water and continue to depend on water from other sources. What are the effects to the ratepayers and access to water in the future? - The safety of the water to be produced needs to be addressed. - Cost issues need to include long-term cost (20, 40, 60 years) to ratepayers and the impact to ratepayers going forward to pay for imported water.
<p>Sergio Ibarra, Arleta Neighborhood Council</p>	<ul style="list-style-type: none"> - Concerned about outreach for this project. - Issue of aesthetics to improve existing properties. - Issue of treating polluted water in vicinity of injection wells. - Injection wells located in a residential community, why not at the Pacoima Spreading Grounds or Tujunga Wellfield instead of in a residential community? - In full support of the purple pipe, but why does the purple pipe have to be installed on Canterbury Avenue? - LADWP should put recreational facilities at Pacoima and Hansen Spreading Grounds. - Explore the issue of traffic, including the Interstate 5 and Interstate 710 construction projects. - Add vegetation or parkland around the injection wells. - Are the chemicals that are being pumped out going airborne?
<p>Dennis Schneider, Recycled Water Advisory Group Committee</p>	<ul style="list-style-type: none"> - Critical that we do have a water supply if something interrupts it. - Seen almost a complete removal of smell around Hyperion [Water Treatment Plant]. - This is a backup system not to prepare for overdevelopment, which the City is not charging developers for.

LOS ANGELES GROUNDWATER REPLENISHMENT PROJECT/PROYECTO DE REABASTECIMIENTO DE AGUAS SUBTERRÁNEAS DE LOS ÁNGELES
INITIAL STUDY AND NOTICE OF PREPARATION/ESTUDIO INICIAL Y AVISO DE PREPARACIÓN
PUBLIC COMMENT CARD/TARJETA PARA COMENTARIOS DEL PUBLICO

(Please submit to Michael Mercado via fax (213) 367-4710, or email michael.mercado@ladwp.com by October 21, 2013/

Por favor regrese esta forma por fax a Michael Mercado al (213) 367-4710, o por correo electrónico a michael.mercado@ladwp.com a más tardar 21 de octubre del 2013)

Name/Nombre: ERIC AGUILAR
Organization/Organización (optional/opcional): _____
Address/Dirección: 907 N. Ave. 51 Los Angeles CA 90042
City, Zip/ Ciudad, Código Postal: 90042
Phone/Teléfono (optional/opcional): (818) 771-4344
E-mail (optional/opcional): eric.aguilar@ladwp.com

Yes/Sí No/No

Would you like to remain on our mailing list to receive future project updates?



¿Le gustaría permanecer en nuestra lista postal para recibir información actualizada del proyecto?

Comments/Comentarios:

Groundwater rights in the SFV have established limits, would this lead to an increase withdrawal and thus expansion of those limits?

Conservation, preservation of natural resources in a responsible manner would uplift the perception of LADWP in the various communities of the valley. Are there any communities that would be negatively affected by the proposed project?

Are there existing lysimeter (lysimeter) stations to measure infiltration at different sites? How hydraulically conductive are the soils, geology of the proposed injection sites?

Will there be rehabilitation of water wells (production wells) as a result of this study?

Local surfacewater vs. imported allocated supplies; which will dominate recycled supply stream?

Comments continued/Continuación de comentarios:

Groundwater models are used, which type will be used to forecast effectiveness?
Which monitoring equipment will be used and who will be responsible for maintaining it?
Will evaporation/evapotranspiration dominate processes at the spreading grounds over replenishment?

What would be the estimated "net" replenishment benefit of this proposal given the existing rate of groundwater replenishment?

Will this project construction disturb any cultural resources in the study area?

Will constant observation of spreading pond levels be required? By Flood Control Public Works Agency or LADWP?

How will this aspect of the Urban Water Management Plan affect potential changes in the LA River Rehabilitation/Revitalization alternatives set forth by U.S. Army Corps of Engineers?

Please fold in thirds (Por favor doble en tercios)

Tape it closed, affix a 45-cent stamp and mail by October 21, 2013. Thank you!

Cierre con cinta, ponga una estampilla de 45 centavos y envíe por correo a más tardar el 21 de octubre de 2013. ¡Gracias!

Los Angeles Department of Water and Power
Environmental Planning and Assessment
111 North Hope Street, Room 1044
Los Angeles, CA 90012
Attn: Michael Mercado

Affix \$0.45
Stamp

LOS ANGELES GROUNDWATER REPLENISHMENT PROJECT/PROYECTO DE REABASTECIMIENTO DE AGUAS SUBTERRÁNEAS DE LOS ÁNGELES
INITIAL STUDY AND NOTICE OF PREPARATION/ESTUDIO INICIAL Y AVISO DE PREPARACIÓN
PUBLIC COMMENT CARD/TARJETA PARA COMENTARIOS DEL PUBLICO

(Please submit to Michael Mercado via fax (213) 367-4710, or email michael.mercado@ladwp.com by October 21, 2013/

Por favor regrese esta forma por fax a Michael Mercado al (213) 367-4710, o por correo electrónico a michael.mercado@ladwp.com a más tardar 21 de octubre del 2013)

Name/Nombre: KEN MURRAY
Organization/Organización (optional/opcional): HOMEOWNER
Address/Dirección: 4511 CAMELIA AVE #
City, Zip/ Ciudad, Código Postal: N. HOLLYWOOD CA 91602
Phone/Teléfono (optional/opcional): .
E-mail (optional/opcional): _____

Yes/Sí No/No

Would you like to remain on our mailing list to receive future project updates?

¿Le gustaría permanecer en nuestra lista postal para recibir información actualizada del proyecto?

Comments/Comentarios:

MUCH CONCERN RE: INVOLVEMENT of public
THESE MEETINGS ENGAGE FEW PEOPLE
STRONGLY, STRONGLY STRONGLY RECOMMEND
NOTIFY RATEPAYERS THROUGH MAILED NEWSLETTERS
E Bills & MAIN LADWP WEBSITE THAT THIS PROJECT
IS BEING CONSIDERED -
VERY IMP! - WITH LINK TO PHASED WEBSITE
PHASE 1 - EXECUTIVE SUMMARY (LIKE TONIGHT!)
PHASE 2 - DISCUSSION OF DETAILS
PHASE 3 - TECHNICAL INFORMATION
PERHAPS USING LINKS AS READERS DESIRE
THERE WAS INSUFFICIENT INFORMATION REGARDING
FINANCIALS

2013.10.17

Meeting with the LA County DPW on the GWR Project Initial Study

County Comments for Scoping

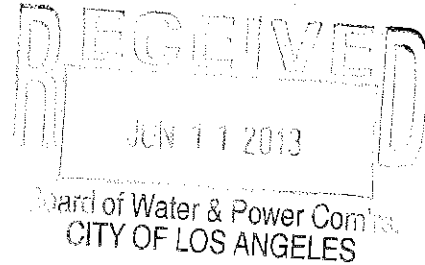
- Analyze water chemistry and impacts on minerals: Purified water from AWPf could leach out minerals and degrade the binding structure of the soil
- Injection Wells
 - Mounding issues:
 - Mounding will drop recharge rates for stormwater. While useful as seawater intrusion barriers, at the proposed site, these wells could create a stormwater recharge barrier (slowing infiltration from the PSG).
 - Possibility of flooding, e.g. basements or underground storage. If this flooding occurs after the wells are installed, City may be blamed.
 - 4 cfs per well is extremely optimistic. At seawater barriers, water is injected at 0.01 to 0.5 cfs per well (with 0.5 cfs being a really good well)
 - Need to develop wells / create hydraulic conductivity after installation, by extracting water first
 - Yearly maintenance is critical, as wells will plug up
 - Causes: biogrowth from the aquifer itself; chemical fouling from additives in the water
 - Maintenance involves both mechanical maintenance and also extracting water and cleaning it (clearing out muck)
 - Expensive to install
- During summer, at each spreading ground, all the basins will be dried out at the same time. This could last up to 1 month. Vegetation will be striped.
 - During this maintenance, the other spreading ground can generally be utilized at times if capacity is available. (I.e. when HSG is undergoing maintenance, use PSG, and vice versa)
 - It's also critical to dry out the SGs to re-establish percolation rates.
- During the storm season, in normal to wet years, storm water will always take precedence.
 - Channel capacity will be used for flood control. If a flooding situation occurs and capacity has been used for GWR Project related volumes, we may face law suites.
 - I.e., during storm events, AWPf product water should not be diverted to channels.
- Potential for algae mats. Algae mats are becoming an issue at the San Gabriel SG, however, this project involves higher quality water that doesn't contain the high nutrients used at SGSG.

But nutrients already in the soil or from storm water, along with the constant feed of AWPf water, may cause growth. Algae mats cause odors. Algae grows strongly in July when it's hot.

- As there may be long periods where the SGs will be unavailable, City should consider creating a system to keep water circulating at DCT to keep the AWPf running.
- City should consider acquiring land and dedicating it to spreading AWPf product water, copying the OCWD model. Consider land from retired gravel pits.

June 7, 2013

Dear Commissioners,
I hope you can help with this issue.
Thank you,
Esther Levy
5419 Murietta Ave.
Sherman Oaks 91401
818 989 2867
estherkale@aol.com



A PLACE OF BEAUTY IN JEOPARDY

I have been a volunteer at the Japanese Garden for nearly 15 years. It has been a valuable part of my life. A place of beauty, for me to enjoy nature and share my pleasure and knowledge with guests. Also learning about the water reclamation process and the need for reclaimed water was very educational for me and this knowledge too I have shared with guests.

For some time the DWP and Department of Sanitation have been talking about expanding and adding a Reverse Osmosis water purification facility within the confines of the Donald C. Tillman property. I think that would be much needed improvement for our water supply. There are four possible sites to build a facility within the DCT property and a fifth one near Hansen Dam. DWP and Department of Sanitation have issued detailed assessments of the cost of each possible site, which I suspect could be easily manipulated. My understanding is that site 2 (or as I just heard is now called site 1) is the preferred site for the Reverse Osmosis plant. That is the closest to the garden. One problem that I see from that location is that it would be an eyesore to the entrance to the garden. It would also incur the added expense of tearing down four buildings which will have to be rebuilt elsewhere. It is questionable how it would affect visitor parking. The more threatening possibility is that a few years after the new building is built, there would be a need to expand and in that site only, there is no room to expand but to the parking lot, which we need for guests, and into the garden itself.

In all their calculation of costs and benefits, there is no mention of the cost of the loss of this beautiful garden, which seems to me the direction is which they are heading. I wonder if it can be saved.



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Notice of Preparation

September 6, 2013

To: Reviewing Agencies
Re: Los Angeles Groundwater Replenishment Project
SCH# 2013091023

Attached for your review and comment is the Notice of Preparation (NOP) for the Los Angeles Groundwater Replenishment Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

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

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

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

Type **NOP** Notice of Preparation

Description An Advanced Water Purification Facility (AWPF) would be constructed within the Donald C. Tillman Water Reclamation Plant (DCTWRP) in Van Nuys, CA. The AWPF would treat up to 44 MGD of secondary or tertiary effluent produced at DCTWRP using advanced treatment technology. Purified recycled water would be conveyed to Hansen Spreading Grounds and Pacoima Spreading Grounds and new injection wells constructed within Canterbury Avenue near Pacoima Spreading Grounds to replenish the San Fernando Groundwater Basin. New conveyance pipelines would be required to transport purified recycled water from Hansen Spreading Grounds to Pacoima Spreading Grounds on Canterbury Avenue.

Lead Agency Contact

Name Michael Mercado
Agency Los Angeles Department of Water and Power
Phone 213 367 0395 **Fax**
email
Address 111 North Hope Street, Room 1044
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of, Van Nuys
Region
Cross Streets 6100 Woodley Avenue
Lat / Long 34° 10' 57.63" N / 118° 28' 50.9" W
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways I-405, US 101
Airports Van Nuys
Railways
Waterways Los Angeles River, Lake Balboa, Wildlife Lake
Schools Bassett ES, Sylvan Park
Land Use Water reclamation plant/PF and OS/Public Facilities and Open Space

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; CA Department of Public Health; Native American Heritage Commission; Public Utilities Commission; California Highway Patrol; Caltrans, District 7; State Water Resources Control Board, Division of Financial Assistance; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4

Date Received 09/06/2013 **Start of Review** 09/06/2013 **End of Review** 10/07/2013

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # 2013091023

Project Title: Los Angeles Groundwater Replenishment Project

Lead Agency: Los Angeles Department of Water and Power Contact Person: Michael Mercado
Mailing Address: 111 North Hope St, Room 1044 Phone: 213-367-0395
City: Los Angeles Zip: 90012 County: Los Angeles

Project Location: County: Los Angeles City/Nearest Community: Los Angeles/Van Nuys

Cross Streets: 6100 Woodley Avenue Zip Code: 91406

Longitude/Latitude (degrees, minutes and seconds): 118 ° 28 ' 50.9" N / 34 ° 10 ' 57.6" W Total Acres: 5

Assessor's Parcel No.: Section: Twp.: Range: Base:

Within 2 Miles: State Hwy #: I-405, US 101 Waterways: Los Angeles River, Lake Balboa, Wildlife Lake

Airports: Van Nuys Railways: N/A Schools: Bassett ES, Sylvan Park

Document Type:

CEQA: [X] NOP [] Draft EIR [] NOI Other: [] Joint Document
[] Early Cons [] Supplement/Subsequent EIR [] EA [] Final Document
[] Neg Dec (Prior SCH No.) [] Draft EIS [] Other:
[] Mit Neg Dec Other: [] FONSI

Local Action Type:

[] General Plan Update [] Specific Plan [] Rezone [] Annexation
[] General Plan Amendment [] Master Plan [] Prezone [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [] Coastal Permit
[] Community Plan [X] Site Plan [] Land Division (Subdivision, etc.) [] Other:

Development Type:

[] Residential: Units Acres
[] Office: Sq.ft. Acres Employees
[] Commercial: Sq.ft. Acres Employees
[] Industrial: Sq.ft. Acres Employees
[] Educational:
[] Recreational:
[] Water Facilities: Type MGD
[] Transportation: Type
[] Mining: Mineral
[] Power: Type MW
[X] Waste Treatment: Type AWPF MGD 44
[] Hazardous Waste: Type
[] Other:

Project Issues Discussed in Document:

[X] Aesthetic/Visual [] Fiscal [X] Recreation/Parks [X] Vegetation
[X] Agricultural Land [X] Flood Plain/Flooding [X] Schools/Universities [X] Water Quality
[X] Air Quality [X] Forest Land/Fire Hazard [X] Septic Systems [X] Water Supply/Groundwater
[X] Archeological/Historical [X] Geologic/Seismic [X] Sewer Capacity [X] Wetland/Riparian
[X] Biological Resources [X] Minerals [X] Soil Erosion/Compaction/Grading [X] Growth Inducement
[X] Coastal Zone [X] Noise [X] Solid Waste [X] Land Use
[X] Drainage/Absorption [X] Population/Housing Balance [X] Toxic/Hazardous [X] Cumulative Effects
[X] Economic/Jobs [X] Public Services/Facilities [X] Traffic/Circulation [] Other:

Present Land Use/Zoning/General Plan Designation:

Water reclamation plant/PF and OS/Public Facilities and Open Space

Project Description: (please use a separate page if necessary)

An Advanced Water Purification Facility (AWPF) would be constructed within the Donald C. Tillman Water Reclamation Plant (DCTWRP) in Van Nuys, CA. The AWPF would treat up to 44 MGD of secondary or tertiary effluent produced at DCTWRP using advanced treatment technology. Purified recycled water would be conveyed to Hansen Spreading Grounds and Pacoima Spreading Grounds and new injection wells constructed within Canterbury Avenue near Pacoima Spreading Grounds to replenish the San Fernando Groundwater Basin. New conveyance pipelines would be required to transport purified recycled water from Hansen Spreading Grounds to Pacoima Spreading Grounds on Canterbury Avenue.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

NOP Distribution List

<input type="checkbox"/> <u>Resources Agency</u> Nadell Gayou	<input type="checkbox"/> Fish & Wildlife Region 1E Laurie Harnsberger	<input type="checkbox"/> Native American Heritage Comm. Debbie Treadway	<input type="checkbox"/> Caltrans, District 8 Dan Kopulsky	<input type="checkbox"/> Regional Water Quality Control Board (RWQCB)
<input type="checkbox"/> Dept. of Boating & Waterways Nicole Wong	<input type="checkbox"/> Fish & Wildlife Region 2 Jeff Drongesen	<input checked="" type="checkbox"/> Public Utilities Commission Leo Wong	<input type="checkbox"/> Caltrans, District 9 Gayle Rosander	<input type="checkbox"/> RWQCB 1 Cathleen Hudson North Coast Region (1)
<input type="checkbox"/> California Coastal Commission Elizabeth A. Fuchs	<input type="checkbox"/> Fish & Wildlife Region 3 Charles Armor	<input type="checkbox"/> Santa Monica Bay Restoration Guangyu Wang	<input type="checkbox"/> Caltrans, District 10 Tom Dumas	<input type="checkbox"/> RWQCB 2 Environmental Document Coordinator San Francisco Bay Region (2)
<input type="checkbox"/> Colorado River Board Tamyra M. Trujillo	<input type="checkbox"/> Fish & Wildlife Region 4 Julie Vance	<input type="checkbox"/> State Lands Commission Jennifer Deleong	<input type="checkbox"/> Caltrans, District 11 Jacob Armstrong	<input type="checkbox"/> RWQCB 3 Central Coast Region (3)
<input type="checkbox"/> Dept. of Conservation Elizabeth Carpenter	<input checked="" type="checkbox"/> Fish & Wildlife Region 5 Leslie Newton-Reed	<input type="checkbox"/> Tahoe Regional Planning Agency (TRPA) Cherry Jacques	<input type="checkbox"/> Caltrans, District 12 Marion Regisford	<input checked="" type="checkbox"/> RWQCB 4 Teresa Rodgers Los Angeles Region (4)
<input type="checkbox"/> California Energy Commission Eric Knight	<input type="checkbox"/> Fish & Wildlife Region 6 Gabrina Gatchel	<input type="checkbox"/> Business, Trans & Housing	<input type="checkbox"/> Caltrans, District 11 Jacob Armstrong	<input type="checkbox"/> RWQCB 5 Central Valley Region (5)
<input type="checkbox"/> Cal Fire Dan Foster	<input type="checkbox"/> Fish & Wildlife Region 6 I/M Heidi Sickler	<input type="checkbox"/> Caltrans - Division of Aeronautics Philip Crimmins	<input type="checkbox"/> Caltrans, District 12 Marion Regisford	<input type="checkbox"/> RWQCB 5R Central Valley Region (5) Fresno Branch Office
<input type="checkbox"/> Central Valley Flood Protection Board James Herota	<input type="checkbox"/> Dept. of Fish & Wildlife M George Isaac	<input type="checkbox"/> Caltrans - Planning Terri Pencovic	<input type="checkbox"/> Air Resources Board	<input type="checkbox"/> RWQCB 6 Lahontan Region (6)
<input checked="" type="checkbox"/> Office of Historic Preservation Ron Parsons	<input type="checkbox"/> Inyo/Mono, Habitat Conservation Program	<input checked="" type="checkbox"/> California Highway Patrol Suzann Ikeuchi	<input type="checkbox"/> Airport/Energy Projects Jim Lerner	<input type="checkbox"/> RWQCB 6V Lahontan Region (6) Victorville Branch Office
<input type="checkbox"/> Dept. of Parks & Recreation Environmental Stewardship Section	<input type="checkbox"/> Dept. of Food and Agriculture	<input type="checkbox"/> Housing & Community Development CEQA Coordinator	<input type="checkbox"/> Transportation Projects Douglas Ito	<input type="checkbox"/> RWQCB 7 Colorado River Basin Region (7)
<input type="checkbox"/> California Department of Resources, Recycling & Recovery Sue O'Leary	<input type="checkbox"/> Dept. of General Services Public School Construction	<input type="checkbox"/> Caltrans, District 1 Rex Jackman	<input type="checkbox"/> Industrial Projects Mike Tollstrup	<input type="checkbox"/> RWQCB 8 Santa Ana Region (8)
<input type="checkbox"/> S.F. Bay Conservation & Dev't. Comm. Steve McAdam	<input type="checkbox"/> Dept. of Public Health Jeffery Worth	<input type="checkbox"/> Caltrans, District 2 Marcelino Gonzalez	<input type="checkbox"/> State Water Resources Control Board	<input type="checkbox"/> RWQCB 9 San Diego Region (9)
<input checked="" type="checkbox"/> Dept. of Water Resources Agency Nadell Gayou	<input type="checkbox"/> Dept. of Health/Drinking Water	<input type="checkbox"/> Caltrans, District 3 Gary Arnold	<input type="checkbox"/> State Water Resources Control Board Student Intern, 401 Water Quality Certification Unit Division of Water Quality	<input type="checkbox"/> Other _____
<input type="checkbox"/> Fish and Game	<input type="checkbox"/> Delta Stewardship Council Kevan Samsam	<input type="checkbox"/> Caltrans, District 4 Erik Alm	<input type="checkbox"/> State Water Resources Control Board Phil Crader Division of Water Rights	
<input type="checkbox"/> Dept. of Fish & Wildlife Scott Flint	<input type="checkbox"/> Independent Commissions, Boards	<input type="checkbox"/> Caltrans, District 5 David Murray	<input type="checkbox"/> Dept. of Toxic Substances Control CEQA Tracking Center	
<input type="checkbox"/> Environmental Services Division	<input type="checkbox"/> Delta Protection Commission Michael Machado	<input type="checkbox"/> Caltrans, District 6 Michael Navarro	<input type="checkbox"/> Department of Pesticide Regulation CEQA Coordinator	
<input type="checkbox"/> Fish & Wildlife Region 1 Donald Koch	<input type="checkbox"/> Cal EMA (Emergency Management Agency) Dennis Castrillo	<input type="checkbox"/> Caltrans, District 7 Dianna Watson		

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard
West Sacramento, CA 95691
(916) 373-3715
(916) 373-5471 – FAX
e-mail: ds_nahc@pacbell.net

September 10, 2013

Mr. Michael Mercado, Environmental Planner

Los Angeles Department of Water and Power

111 North Hope Street, Room 1044
Los Angeles, CA 90012

RE: SCH#2013091023 CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the **“Los Angeles Groundwater Replenishment Project;”** located in the City of Los Angeles; Los Angeles County, California

Dear Mr. Mercado:

The Native American Heritage Commission (NAHC) has reviewed the CEQA Notice regarding the above referenced project. In the 1985 Appellate Court decision (170 Cal App 3rd 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. This area is known to the NAHC to be very culturally sensitive. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the

planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans. Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,


Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts
Los Angeles County
September 10, 2013**

Beverly Salazar Folkes
1931 Shadybrook Drive
Thousand Oaks, CA 91362
folkes9@msn.com
805 492-7255
(805) 558-1154 - cell
folkes9@msn.com

Chumash
Tataviam
Ferrnandeño

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693
San Gabriel, CA 91778
GTTribalcouncil@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 -FAX

Gabrielino Tongva

Fernandeno Tataviam Band of Mission Indians
Larry Ortega, Chairperson
1019 - 2nd Street, Suite #1
San Fernando CA 91340
(818) 837-0794 Office

(818) 837-0796 Fax

Fernandeno
Tataviam

Randy Guzman - Folkes
6471 Cornell Circle
Moorpark, CA 93021
ndnRandy@yahoo.com
(805) 905-1675 - cell

Chumash
Ferrnandeño
Tataviam
Shoshone Paiute
Yaqui

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th St, Rm. 403
Los Angeles, CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Gabrielino /Tongva Nation
Sandonne Goad, Chairperson
P.O. Box 86908
Los Angeles, CA 90086
sgoad@gabrielino-tongva.com
951-845-0443

Gabrielino Tongva

Kitanemuk & Yowlumne Tejon Indians
Delia Dominguez, Chairperson
115 Radio Street
Bakersfield, CA 93305
deedominguez@juno.com
(626) 339-6785

Yowlumne
Kitanemuk

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490
Bellflower, CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-761-6417- fax

Gabrielino Tongva

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

his list s only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013091023; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Los Angeles Groundwater REplenishment Project; located in the City of Los Angeles; Los Angeles County, california.

**Native American Contacts
Los Angeles County
September 10, 2013**

Gabrielino-Tongva Tribe
Bernie Acuna, Co-Chairperson
P.O. Box 180 Gabrielino
Bonsall , CA 92003
(619) 294-6660-work
(310) 428-5690 - cell
(760) 636-0854- FAX
bacuna1@gabrielinotribe.org

Gabrielino /Tongva Nation
Sam Dunlap, Cultural Resources Director
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
samdunlap@earthlink.net
909-262-9351

Gabrielino-Tongva Tribe
Linda Candelaria, Co-Chairperson
P.O. Box 180 Gabrielino
Bonsall , CA 92003
palmsprings9@yahoo.com
626-676-1184- cell
(760) 636-0854 - FAX

Gabrielino Band of Mission Indians
Andrew Salas, Chairperson
P.O. Box 393 Gabrielino
Covina , CA 91723
gabrielenoindians@yahoo.
(626) 926-4131

Gabrielino-Tongva Tribe
Conrad Acuna,
P.O. Box 180 Gabrielino
Bonsall , CA 92003

760-636-0854 - FAX

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013091023; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Los Angeles Groundwater Replenishment Project; located in the City of Los Angeles; Los Angeles County, California.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, REGIONAL PLANNING

IGR/CEQA BRANCH

100 MAIN STREET, MS # 16

LOS ANGELES, CA 90012-3606

PHONE: (213) 897-9140

FAX: (213) 897-1337

*Flex your power!
Be energy efficient!*

September 19, 2013

IGR/CEQA No. 130910JP-NOP

Los Angeles Groundwater Replenishment Project

Vic. LA-405, LA-101 / PM 40.081

Mr. Michael Mercado
City of Los Angeles
Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA, 90012

Dear Mr. Mercado:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project proposes an advanced water purification facility to be constructed within the Donald C. Tillman Water Reclamation Plant in Van Nuys, CA.

The project is located near the I-405 Corridor, please be reminded that any work to be performed within the State Right-of-way will need an Encroachment Permit from the Caltrans. Any modifications to State facilities will need to meet all mandatory design standard and specifications.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects need to be designed to discharge clean run-off water. Additionally storm water run-off is not permitted to discharge onto State highway facilities.

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from the Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods. In addition, a truck/traffic construction management plan is needed for this project.

If you have any questions, please feel free to contact me at (213) 897-9140 or Jonathan Palacio the project coordinator at (213) 897-3747 and refer to IGR/CEQA No. 130910JP.

Sincerely,

A handwritten signature in blue ink that reads "Dianna Watson".

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

State Water Resources Control Board

SEP 25 2013

Michael Mercado
Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, California 90012

Dear Mr. Mercado:

INITIAL STUDY (IS) FOR LOS ANGELES DEPARTMENT OF WATER AND POWER (CITY);
(PROJECT); LOS ANGELES COUNTY; STATE CLEARINGHOUSE NO. 2013091023

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

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

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

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

Please be advised that the State Water Board will consult with USFWS, and/or NMFS regarding all federal special-status species that the Project has the potential to impact if the Project is to

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

be funded under the CWSRF Program. The City will need to identify whether the Project will involve any direct effects from construction activities, or indirect effects such as growth inducement, that may affect federally listed threatened, endangered, or candidate species that are known, or have a potential to occur, on-site, in the surrounding areas, or in the service area, and to identify applicable conservation measures to reduce such effects.

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

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

Other federal requirements pertinent to the Project under the CWSRF Program include the following:

- A. Compliance with the Federal Clean Air Act: (a) Provide air quality studies that may have been done for the Project; and (b) if the Project is in a nonattainment area or attainment area subject to a maintenance plan; (i) provide a summary of the estimated emissions (in tons per year) that are expected from both the construction and operation of the Project for each federal criteria pollutant in a nonattainment or maintenance area, and indicate if the nonattainment designation is moderate, serious, or severe (if applicable); (ii) if emissions are above the federal de minimis levels, but the Project is sized to meet only the needs of current population projections that are used in the approved State Implementation Plan for air quality, quantitatively indicate how the proposed capacity increase was calculated using population projections.
- B. Protection of Wetlands: Identify any portion of the proposed Project area that should be evaluated for wetlands or United States waters delineation by the United States Army Corps of Engineers (USACE), or requires a permit from the USACE, and identify the status of coordination with the USACE.
- C. Compliance with the Migratory Bird Treaty Act: List any birds protected under this act that may be impacted by the Project and identify conservation measures to minimize impacts.
- D. Compliance with the Flood Plain Management Act: Identify whether or not the Project is in a Flood Management Zone and include a copy of the Federal Emergency Management Agency flood zone maps for the area.

Following are specific comments on the City draft IS:

1. Air Quality, Page 3-4: Please include a detailed air quality projections model of the Project's lifespan in order to provide technical support for this resource section's impacts discussion.
2. Air Quality and Green House Gas Emissions, Page 3-4, 3-5 and 3-11: Please include the details of all vehicular and construction-related emissions that will be contributing to the Project's air pollution, as technical support for the resource sections' impacts discussions.
3. Biological Resources, Page 3-6: Please provide a complete list of all listed and special status state and federal species that have the potential to occur within the Project site and its surrounding area. Additionally, please include a construction schedule to ensure that construction will not interfere with listed or special status species' migratory patterns and/or lifespan.
4. Geology and Soils, Page 3-9: Please include a detailed description of the proposed Project's design and construction plans that will ensure there are no potentially significant impacts from earthquakes, ground shaking, ground failure (liquefaction) or landslides in the next draft of the Project's EIR.
5. Hazards and Hazardous Materials, Page 3-12: Please include a detailed discussion outlining how future chemical deliveries to the DCTWRP will be conducted with the utmost public safety in mind.
6. Hazards and Hazardous Materials, Section d, Page 3-13: Please include a list of all hazardous materials identified on or surrounding the Project site.
7. Transportation/Traffic, Page 3-24: Please include a detailed schedule of construction operations, in order to ensure that traffic would not be significantly affected. If significant traffic impacts cannot be avoided, please provide appropriate mitigation measures to lessen the magnitude of the impact(s).

Thank you for the opportunity to review the City's draft IS. If you have any questions or concerns, please feel free to contact me at (916) 341-5855, or by email at AKashkoli@waterboards.ca.gov, or contact David Werner at (916) 327-9117 or by email at DWerner@waterboards.ca.gov.

Sincerely,



Ahmad Kashkoli
Senior Environmental Scientist

Enclosures (4)

1. SRF & CEQA-Plus
2. Quick Reference Guide to CEQA Requirements for State Revolving Fund Loans
3. Instructions and Guidance for "Environmental Compliance Information"
4. Basic Criteria for Cultural Resources Reports

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

Date: October 18, 2013

TO: Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012
Attn: **Michael Mercado**

FROM: Catrina Schick
3654 Goodland Avenue
Studio City, CA 91406

SUBJECT: **PUBLIC COMMENT RESPONSE TO THE:**

Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the Los Angeles Ground Water Replenishment Project, Initial Study and Notice of Preparation - dated September 6, 2013

The following comments are provided to be addressed and responded to in the preparation of the Draft and Final EIR to be prepared by the lead agency DWP.

1. **All** rate payers of DWP need to be individually informed (through their billing) that DWP/Sanitation are moving forward with reclaiming sewage water and injecting it into the ground water table, **in clear language**, that the rate payers can understand.

This proposed project affects the water supply for all the DWP rate payers, not just the construction areas in the Valley. Also the rate payers do not have any alternatives to obtain their water supply.

The Public outreach for this NOP was very poorly addressed and hurried as confirmed by the attendees at all three Public Meetings, which also had minimal attendance (less than 30 attendees at all three meetings).

2. In the brochure in your handout packet titled **Recycled Water Master Planning** dated October 2012 on page 8 it states "all five sites will be carried forward for environmental documentation". The current 45 day public review period only includes 2 of the 5 locations.

To get meaningful public awareness and input and appropriate environmental impact evaluation of the proposed AWPf, all five locations need to be evaluated to be able to select the best environmental location with minimal mitigations and impacts to adjacent areas such as Woodley Park and The Japanese Garden, which have lot of week and weekend public usage. (See attachment #1)

In the Draft Report dated 1/18/2010 the five sites were evaluated by experts and the Contractors Laydown Area received 14 number one rankings out of 18. The DCT SW site (the one proposed in the NOP) only received 4 #1 rankings. This needs to be reviewed by an independent entity (not DWP or Sanitation) as to why the proposed location of the AWPf facility was selected at the worst location. (See attachment #2)

At the July 23, 2013 meeting of the **Sepulveda Basin Wildlife Steering Committee**, Mr. Hinds, Mr. Haddad, Mr. Mercado and Mr. Poosti presented to committee members the 'Proposed Los Angeles Groundwater Replenishment Project' stating that the Notice to Proceed (NOP), which is the process currently out for public comment, will include Environmental assessments for **ALL FIVE** of the proposed AWPf sites. Only two were included. (See attachment #3)

Since only **TWO** sites were provided for the current public input and all **FIVE** were not included this would make the current EIR process **INVALID** and the NOP process needs to be redone and put out to the public again in order to obtain the public input that is required by the CEQA process. All work on the environmental documentation should **STOP** until a new NOP is released and there is **PROPER NOTIFICATION** to ALL DWP rate payers.

3. In the Initial Study dated September 13, 2013 on page 2-4 the Aesthetic box was not checked meaning there will be no Aesthetic impacts. On page 2-5 C the box was checked 'No Impact'. IN FACT; there will be significant impacts for The Japanese Garden and its visitors as the proposed industrial facility is sited at the south end of the Garden parking lot. Also the proposed project location deletes some of the necessary and required parking.

Placing the proposed additional parking along the service road next to process tanks, City vehicles and chemical delivery trucks is detrimental to the safety of the public and aesthetically poor.

4. The proposed location for the AWPf at DCT is located at the southern end of the site. If there is a breach in the Dike the proposed facility or internal site flooding the AWPf would be inundated with over 10 feet of water. The site at the north end (Contractors Laydown **OR** proposed relocation area of the Maintenance Facilities) are at an elevation equal to or close to the existing southern DCT Dike height, so there will be no danger of flooding if the facility is raised about two foot above the existing grade.

Also the Contractors Laydown area does not impact future expansion of DCT, as the proposed AWPf can be placed in the upper one half of the laydown area allowing for future DCT primary tank expansion.

5. The cost to construct the **new** warehouse and maintenance facilities in DWP's current cost spread sheet is **\$14 million**. The Bureau of Sanitations' estimated cost, as the lead agency for the design and construction of the project, is **\$39 million**. (See attachment #4)

The DWP spread sheet also shows the demolition cost of the existing maintenance facilities at **\$219,000**. The cost to demolish roadways, underground utilities, concrete building, recycling of materials, hauling debris, etc., is realistically between **\$5 to \$6 million dollars**. Also, there is other demolition and infrastructure work that needs to be completed to construct the AWPf at the current location of the 'existing'34 maintenance facility area.

It is apparent that the costs to construct the AWPf and move and demolish the existing maintenance facilities are being manipulated to construct the AWPf at the existing maintenance facility area, with flagrant disregard for costs or environmental impacts.

The maintenance facility demolition would have significant environmental impacts and is unnecessary if the AWPf was placed at the north end of the DCT site or at a better location being the DWP Valley Generation Station (VGS) site, which will have minimal environmental impacts and not have any impacts on future DCT expansions.

There is an existing DWP Substation, just east of the Contractors Laydown area, where power for the AWPf can be utilized for the project. If the AWPf is sited at the existing maintenance area new duct banks would have to be run from the existing substation at the north end of the DCT location creating more negative environmental impacts.

6. Has the Regional Water Quality Control Board (RWQCB) given the City **written** or tentative approval that after spending up to **ONE BILLION** dollars for the intended scope of work, they will approve a permit for Ground Water recharge and distribution including injection wells, as well as other uses?

7. If the AWPf is placed at the VGS site, the DCT Title 22 reclaimed water currently being delivered to DWP customers along the pipe line to VGS, could continue, with no additional cost to purify the water, which would allow for cost savings and not wasting advanced treated water for industrial purposes.

The brine line that needs to be constructed if the AWPf is placed at VGS, when installed, could allow for an opportunity to add a pipe for reclaimed Title 22 water or an advanced water distribution pipe to service customers, providing additional reclaimed water availability and reduce the need to utilize potable water for industrial use that could be available for ground water recharge.

8. Has the cost savings shown on page 22 of the Executive Summary, dated October 2012, taken into consideration the evaporation (ET rate) of the water in the spreading grounds and percolation rates of each site including the fact that the DCT facility cannot operate at full capacity due to maintenance and repairs?

9. Has there been a comprehensive study on the effects of injecting the AWPf treated water into the ground water table that currently has several contaminated wells, as this injection of water may cause a spreading of the pollution to other areas? Please provide a copy to me of this report and if not it should be considered prior to moving forward with any of the proposed scope of

work as injection is the only way to reach the anticipated addition of recycled water to the water table. This is a major environmental consideration.

Attachment #1

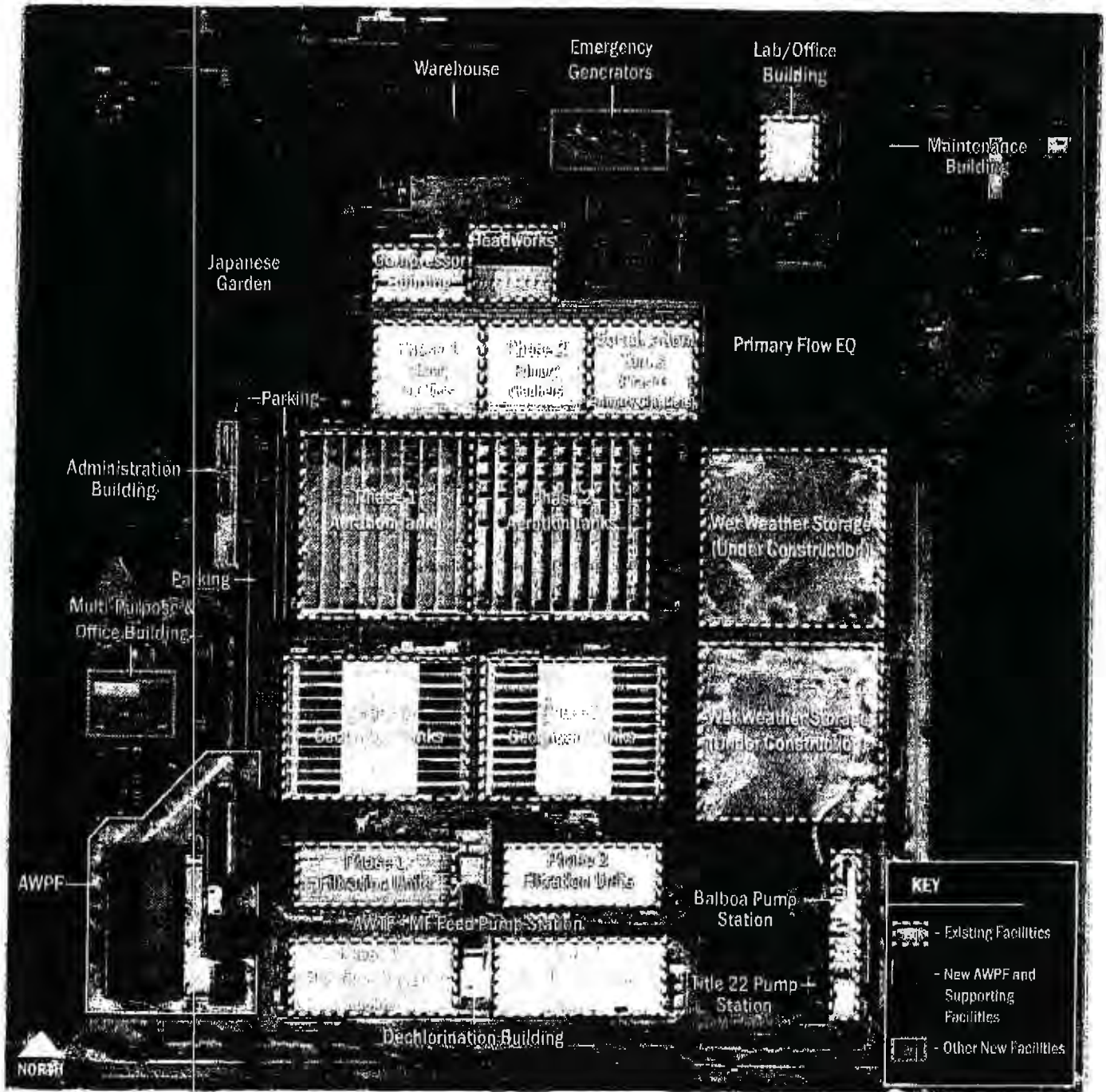


Figure ES-7: Aerial View of DCTWRP Preliminary Site Plan

Five viable sites were identified as candidate locations for the AWPF at the City's DCTWRP and Valley Generating Station (VGS). Although all five sites will be carried forward for environmental documentation, the City's preferred site location for the AWPF is located at the southwest corner of the existing DCTWRP based on analysis of proximity to existing facilities and staff for economics of operation, proximity to flood control facilities, and location of other future treatment process expansion opportunities. Figure ES-7 shows an aerial view of the DCTWRP with proposed AWPF Improvements shown in blue.



Attachment #2

Table 7-3: Summary of CDP Results (Revised 01/18/10)
 (Forcemain and pump station for AWTP backwash and concentrate for Site 3 VGS)

Condition	Sensitivity Run Number & Description	Site 1	Site 2	Site 3	Site 4	Site 5
		DCT SE	DCT SW	VGS	Cricket Fields	Contractor Lay Down Area
Base Condition	Base Condition		3	2		
	1 RWAG Average Weights		2		3	
	2 RWAG Environment Emphasis				2	2
	3 RWAG Social Emphasis				3	2
	4 Cost Emphasis	3	2			
	5 Equal Weights				3	
	6 Modified Cost Scale		3	2		
	7 Modified Institutional Complexity Score		3	2		
Scenario 1	Scenario 1		2	3		
	1 RWAG Average Weights		2		3	
	2 RWAG Environment Emphasis				2	2
	3 RWAG Social Emphasis				3	2
	4 Cost Emphasis	3	2			
	5 Equal Weights		2		3	
	6 Modified Cost Scale		3	2		
	7 Modified Institutional Complexity Score		3	2		
	8 Modified Weighting for Maximize Implementation Evaluation Criteria		2	3		
Number of Times Ranked First		0	4	0	0	14

Attachment #3, page 1

**Sepulveda Basin Wildlife Areas Steering Committee
Meeting July 23, 2013 - Draft Minutes**

Chair Glenn Bailey called the meeting to order at 6:38 PM. Self introductions were made.

Voting status of Canada Goose Project: This is their 4th meeting attended out of the most 8 recent, so they are now again a voting member of this committee. Glenn requested a letter on letterhead appointing a representative and alternate.

A quorum was established: 7 voting members present out of 8. Present were voting members Glenn Bailey, Terrie Brady, Glen Dake, Steve Hartman, Muriel Kotin, Robert Munsey and Rosemarie White. (Joe Phillips, alternate for Jan Kidwell arrived late and did not sit at the table.) Non-voting members, alternates and guests were John Alford, Robert Baker, K. Flores, Debra George, Serge Haddad, John Hinds, Hongjoo Kim, Rose Leibowitz, Michael Mercado, Ann Ohlenkamp, Kris Ohlenkamp, Ali Poosti and Louise Rishoff.

Minutes of 5/28/13: These were approved by consensus after addition on page 4 that ground nesting birds should be protected at the proposed cricket field. Minutes of 3/26/13 deferred to later in the meeting.

Announcements: Pedlow Skate Park will have a large event in mid August with about 3,000 participants.

John Alford for Brad Sherman's office: John is trying to reach out to the new Army Corps Colonel. He does not know what plans they have for the South Reserve. He requested committee members to keep him apprised of any communications we have with the Corps. Kris O has been trying to set up a meeting with the Corps about the South Reserve.

Presentation by DWP of Proposed Recycled Water and Groundwater Replenishment Project: An overview focusing on elements involving Tillman and Sepulveda Basin

Sepulveda Basin Wildlife Areas Steering Committee
Meeting July 23, 2013 - Draft Minutes

Page 2

was presented by John Hinds (DWP) with assistance from Serge Haddad (DWP), Michael Mercado (DWP) and Ali Poosti (Sanitation). They are currently preparing a draft Notice of Preparation (NOP) and doing preliminary design. They expect to release the NOP in mid August. They expect to begin construction in 2018-2019.

An advanced treatment facility will be able to take secondary or tertiary effluent and clean it, prior to the water being piped to the Pacoima and Hansen Spreading Grounds. The environmental documentation will assess 4 possible sites at Tillman (DCT), 2 inside the berm, 2 outside, and a 5th at the Valley Power Generating Station near San Fernando Road, south of Hansen Dam. Outside the Tillman berm is much more complicated than in. One site, their #2 in the SW corner within the berm meets all of their criteria.

The 54" pipeline to Hansen Spreading Ground is in place. For piping the reclaimed water to the north valley, they need 80 MGD (Million Gallons/Day) of untreated water going into DCT to have enough for reclaimed water for Lake Balboa and Wildlife Lake. Each of the 2 phases of DCT can handle 40 MGD (80 total) coming in, producing about 32 MGD effluent per phase. Right now 40 MGD total is going into the plant and 32 MGD total is produced of tertiary. The 3 lakes, (1) Wildlife, (2) Lake Balboa (and Bull Creek?), and (3) Japanese Garden need 20 MGD. LAR will continue to get flow through from the Wildlife Lake and Lake Balboa, and perhaps lose the effluent that is piped directly to the river. Would they have enough water given today's amts? No. They need to reroute from existing sewage pipes the flows that now bypass Tillman, which is a matter of adjusting valves.

Minutes of Meeting 3/26/13: Approved without objection.

Commemorative Grove Plan: Hongjoo Kim presented his landscape plan. He would add more valley and live oaks to the existing ones and would add sycamores along the existing DG pathway that forms the east edge of the area. 52 rocks like those in the amphitheater would be added, representing the length of the LA River and

Attachment #4, page 1



Site Assessment TM
City of Los Angeles Recycled Water Master Planning

Site No. Site Name	1 DCT SE			2 DCT SW		
	Item	Notes	Cost	Item	Notes	Cost
	AWPF Capacity		32.4	AWPF Capacity		32.4
	Capacity Cost of Structures	a	\$62,300,000	Capacity Cost of Structures	#	\$62,300,000
	Capacity Cost of Equipment	a	\$110,400,000	Capacity Cost of Equipment	n	\$110,400,000
	Two-story MF/RO Building (Incremental Cost)	b	\$515,000	Two-story MF/RO Building	b	\$515,000
			\$0	New parking and fence	c	\$65,000
	Use eastern half of Phase II CCB for MF/RO Break Tank and UV Building (Incremental Cost)	f	\$765,000			\$0
			\$0			\$0
			\$0	Demo existing maintenance and warehouse bldgs and relocate to north	h	\$219,000
			\$0	Add new maintenance and warehouse bldgs	i	\$14,000,000
			\$0			\$0
			\$0			\$0
			\$0			\$0
	Add new pumps at existing Balboa PS for AWPF product water pumping	o	\$762,000	Add new pumps at existing Balboa PS for AWPF product water pumping	o	\$762,000
Scenario 1			\$0			\$0
			\$0	New 48" (500 ft) pipeline to convey Secondary/Tertiary effluent from DCT to AWPF influent	r	\$397,000
			\$0	New 42" (1500 ft) pipeline to convey AWPF product water to Balboa Pump Station	t	\$1,040,000
	New 27" PVC (450 ft) AWPF backwash and concentrate pipeline	w	\$459,000	New 27" PVC (450 ft) AWPF backwash and concentrate pipeline	w	\$459,000
			\$0			\$0
			\$0			\$0
	New Phase 4 Equalization Basin	ab	\$9,540,000	New Phase 4 Equalization Basin	ab	\$9,540,000
	Subtotal		\$184,700,000	Subtotal		\$199,700,000
	Contingency (30%)		\$55,400,000	Contingency (30%)		\$59,900,000
	Construction Total		\$240,100,000	Construction Total		\$259,600,000
	Implementation Costs (30%)		\$72,000,000	Implementation Costs (30%)		\$77,900,000
	TOTAL CAPITAL COST		\$312,000,000	TOTAL CAPITAL COST		\$338,000,000

COST DIFF B/W SITE 2 to RAY DOWN TO 2.2 mil plus plus

Attachment #4, page 2

DCT

(New Project This FY)

DCT MAINTENANCE FACILITIES RELOC

DCT Maintenance Facilities Relocation
 FMD #: 1311
 In Yr Rpt Yes
 FMD Rep: Terry U
 Client Rep: Hideo Nishio
 PI#: Al Buzzi
 Des Div: 45
 Proj No: 6195
 Proj Type: DCT
 Source:

Cost Estimate 25.1875

Request Data	Class	Amount	Request Date
5/1/2011	O	\$30,000,000	
Project Approvals			
Class	Type	Budget Amt	WO #
5/1/2011	PRC Mtg	50	X
Mtds/Actions			
9/19/2011	EED		
7/22/2011	EEO		
5/16/2011	General Itbp		

Per 5/19/11 presentation meeting project is below the rubble and needs to be deleted for year 10/2
 Risk Meter needs to be by construction total 2011-2018
 Approved for work order at 5/17/11 PRC

For this project, per the preliminary agreement between BOS and DWP it was decided that BOS would initially pay for the building and DWP would reimburse BOS. While a MOU has not been signed, this is what has been verbally agreed upon at meetings with BOS and DWP. This agreement is the primary of these meetings for BOS and this should already be aware of the situation.

2012/2013 Draft Wastewater CIP (Workshop 1)

PRICER YEARS	PRICER YEARS										TOTAL	
	1ST YEAR	2ND YEAR	3RD YEAR	4TH YEAR	5TH YEAR	6TH YEAR	7TH YEAR	8TH YEAR	9TH YEAR	10TH YEAR		
FAP	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
CTP	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
RW	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
COMS	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
FACM	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
CTCM	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Totals	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

Cash Flow Last Revision Date: 8/15/2011. Update per Aug 2011 workshop

This project will relocate the current Maintenance Facilities at Dorado C. Tillman (DCT) Water Reclamation Plant in order to accommodate the new AWTF ME-RO-UV/H2O2 facility which is to be built. The new location of the Maintenance Facilities must be at a minimum 30,000 sq ft of building plus parking areas to replicate the current location. Only City staff will be working on this project in fiscal years 10/11 and 11/12.

UPRS Data / Cash Flow	Project Title	DCT - Maintenance Facilities Relocation										Totals	
		1ST YEAR	2ND YEAR	3RD YEAR	4TH YEAR	5TH YEAR	6TH YEAR	7TH YEAR	8TH YEAR	9TH YEAR	10TH YEAR		
FAP	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
CTP	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
RW	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
COMS	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
FACM	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
CTCM	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Totals	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

UPRS Type: DCT
 UPRS Scope: UPRS WD SZD11242
 UPRS Status: 9/21/2011

This project is to move the current maintenance facilities at DCT in order to make room for the new AWTF project which is go into operation 2020

July 11 - The project is currently in the pre-design phase. Scoping meeting will be conducted September 11.
 Jan/11 - The project is currently in the pre-design phase and information is being gathered

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October 18, 2013

Los Angeles Department of Water & Power Environmental Affairs
111 N. Hope Street, Room 1044
Los Angeles, A 90012

Sent by Email

Attention: Charles C. Holloway, Manager Environmental Planning & Assessment
Michael Merado, Environmental Project Manager

Gentlemen:

At its regular board meeting on October 16, 2013, the Board of the Studio City Neighborhood Council passed the following motion:

MOTION 10.16.2013.SP6: The Board of the Studio City Neighborhood Council supports the proposed Los Angeles Groundwater Replenishment Project, which consists of: (1) treatment, (2) conveyance, (3) replenishment.

We request that the Environmental Impact Report that is being prepared fully address all the significant impacts identified in the initial study and that appropriate mitigations be proposed.

If you have any questions, please do not hesitate to contact us.

Sincerely Yours,

Lisa Sarkin

A handwritten signature in black ink, appearing to be "LS" or "Lisa Sarkin", written over a faint circular seal of the City of Los Angeles.

Lisa Sarkin, Vice President
Studio City Neighborhood Council

Cc: Los Angeles City Councilmembers, Matt Hale, Karo Torossian

LS/ls

On Sunday, October 20, 2013 8:45 AM, Barbara Shellow <bshellow@yahoo.com> wrote:

Statement - I am a DWP rate payer and a long time docent/volunteer at the Japanese Garden adjacent to the DCTWRP and 100% in favor of cleansing our waste water to be recycled as potable. I am only concerned that this planned project if constructed on the Tillman site in the maintenance area will adversely impact the function of the Japanese Garden, both environmentally and by decreasing its accessibility. to the public. Therefore...I am,

Concerned - CEQU invalid. It was publicly announced by DWP and Sanitation and appears in the minutes of the July 23rd meeting of the Sepulveda Basin Wildlife Steering Committee that all of the potential 5 sites would be developed for inclusion in the EIR. This has not been done as you are only developing the Tillman maintenance site and the VGS. Therefore your CEQU document is invalid. This document will form the basis for all considerations that will be put forward in the eventual EIR, thus making the whole process flawed. You are skewing the options and further eroding the public trust.

Concerned - Of the final five sites that are all supposedly under consideration , site 5 (contractors lay-down area) on the Tillman site met 14 of the 18 critical criteria far outnumbering the other four sites. Again misguiding the public with skewed so called facts. How can we make an informed decision with such biased information.

Concerned - The projected costs of the project at the Tillman Maintenance site seem to be quit illusive and non-conclusive. There seems to be false estimates of the actual cost of the destruction/ reconstruction of the maintenance facilities phase and no mention of the cost of maintaining the infrastructure for this project.

Concerned - public outreach for input seems to be negligible and sneaky. Again negating the validity of the process. Notification in the legal notice section of the Times and perhaps a more widely read Spanish language paper is not sufficient. Plus, scoping meetings were only scheduled at sites close to the two chosen by DWP, i.e., Tillman maintenance site and the VGS. This project will be paid by all of the city rate payers, shouldn't they have some input also?

Concerned - Environmentally, you have addressed this project as being in an industrial area. In fact, it is in the middle of the Sepulveda Recreational area, a popular and widely used venue. The main site you are proposing (Tillman maintenance area) is within feet of a densely used public park. The public will potentially be exposed to toxic materials and the delivery route for said materials will be Woodley Avenue. None of this would be a problem if site 5 (contractors lay down area at the NE corner of the Tillman campus) were used.

Concerned - Environmentally, pumping the finished product of this project would mean that you would essentially be transferring potable water to the Hanson Dam spreading grounds and losing most of it through evaporation before it would even be able to percolate through to the aquifer. This would be during the summer months, i.e., summer=heat=evaporation. In the winter months you would be using the injection wells

with the potential of increasing the contamination of the aquifer.

Concerned - If you used all of the proposed output from Tillman, a situation that will not happen, environmentally, what will happen to the flow of the LA river?

Concerned - You are planning this project that will probably cost the rate payers, ME, almost a Billion dollars, (only a slight exaggeration) without the written approval from (RWQCB) that they will approve a permit for ground water recharge.

Concerned - Not wanting to be a NIMBY, but the VGS seems to be a more appropriate site. Already in an industrial area, No need to pretty it up, it's form would speak for itself in respects to public education, and it is in closer proximity to the spreading grounds. I realize that a brine discharge line would have to be run, but still costs would not be as astronomical.

Concerned - That the most appropriate site on the Tillman campus, the contractors lay down area is being ignored only because DWP has deemed the maintenance area a better public relations opportunity. The lay down area has the advantages of being away from impacting public safety, not subjected to threats from flooding with just a few feet elevation in height, and far less expensive in the long run.

Concerned - That my passion for maintaining the integrity of the Japanese Garden and its mission to educate the public on the beauty of reclaiming water will be undermined by my rambling concerns.

Yes, I would like to remain on your mailing list and receive further project updates.

Barbara I Shellow
1757 Roscomare Road
Los Angeles, CA. 90077-2212
310)472-6522

DATE: 4pm 10/21/13

TO: Los Angeles Department of Water and Power
Los Angeles, CA 90012
Attn.: Michael Mercado, 213-367-0395
"Michael Mercado" <michael.mercado@ladwp.com>

cc: CM/CD2, Paul Krekorian, councilmember.krekorian@lacity.org
CM/CD4, Tom Labonge, councilmember.labonge@lacity.org
CM/CD6, Nury Martinez, councilmember.martinez@lacity.org
CM/CD7, Felipe Fuentes, councilmember.fuentes@lacity.org
AM/39 Raul Bocanegra, Raul.Bocanegra@asm.ca.gov
AM/43 Mike Gatto, Mike.Gatto@asm.ca.gov
AM/46 Adrin Nazarian Adrian.Nazarian@asm.ca.gov
Staff - Mariana.Sabeniano@asm.ca.gov

FROM: Dr. Tom Williams, Citizens Coalition for Safe Community
Sierra Club, Angeles Chapter, Water Committee

SUBJECT: Notice of Preparation (NOP) of Environmental Impact Report (EIR)
Los Angeles Groundwater Replenish Project (LAGWR/LAGRP)
SCH-20130905??

RE: Comments on NOP, IS, and Project Description

Sources: NOP 5 pgs
IS / Project Description, Checklist, and Assessment 66 pgs
Sepulveda Garden Center Public Meeting
LACo Integrated Regional Water Management Strategic Plan (IRWMP)

We have reviewed various accessible documents regarding the proposed "Project" and have participated in one public meeting.

We request that a Scoping Report be circulated at a later date (i.e., Dec. 1, 2013) with a request for additional public comments, OR that DWP revise and recirculate the entire NOP for further comments by November 1, 2013.

Our request for revisions and extension of comment periods reflects our General Comments for inclusion in the DEIR as follows (along with the many detailed comments thereafter, attached):

Definitions/Terms - Use of terms and acronyms is confusing for the public without considerable background in several subjects. A section of Definitions, Glossary, and Acronyms and their consistent and comprehensive application throughout all documents would comply with CEQA requirements for publicly accessible discussion, for example "development" for water resources is different from land use "development" and water resources development refers to an industrial sector including sourcing, reuse, recycling and retailing. Others include: Reliability, Risk, Contingency, Flexibility, etc.

Project Description - The Project Description is incomplete and inadequate for review and comment and requires all elements of supply and resources from source (treatment facility) to use (tap) and for recharge to discharge and does not include any info regarding the groundwater basin or the HTP;

Regional/State Level Water Resources Management - One apparent goal for the project relates to statewide and regional context which is not provided, e.g., 2015-2040 Import Conditions and Physical Capacity Limits, Import Reliability and Local Contingencies, physical limited/maximum achievable operational service capacities, and Inter-/Intra-Agency coordination and cooperation agreements (ie.e, 40,000AFY of "Transfers").

Issues - Goals/Objectives-Purposes/Needs - Although a specific CEQA EIR section is not provided and various other terms are used without connections with the issues and goals for the Department and for the Project and how this one particular project connects with others in the Department, City, County, region, Delta and Sacramento basin, and California, and even beyond (Colorado River basin).

Reliability and Replacement of Imported Water - Reliability is commonly defined in relationship to the costs to customers of the unreliability or risks realized and losses incurred vs the costs to augment the supply/transmission/delivery and therefore provide contingencies against the risks. Costs, revenues,

financial, and fiscal aspects of all project components are specifically avoided in the project description and in the assessments of socioeconomic and fiscal/financial issues and in the development of reasonable alternatives.

Other Agencies / Programs Context - This Project is not borne or evolving in isolation and when included as a reliability or contingency issue, the relationships of this east end of SFB Project must be related in Purposes and needs and Project Description to its position with other programs and their agencies, e.g.:

Department of Health Services (1970-2013) Direct/Indirect Reuse Requirements
 Bay-Delta Emergency Plans - Delta Levee Breaches (DWR, WR Board, CWP, etc.)
 CWP Emergency Plans - Canals/Tunnels Breaches (MWD, DWR,...)
 Global-Warming/Climate-Changes, Good Water Stewardship
 Improved locally available supplies (LACounty and Watermaster)
 Reuse of previously imported freshwater (Bureau of Sanitation)
 USACOE/LACity - LA River Plan

Alternatives - The word "Alternatives" has been mentioned three times in 80+pages, although one purpose of Scoping is to promote public submission of reasonable alternatives. This is a serious issue and reflects upon the objectivity of the DWP Scoping process and documents and presumes that there are no other feasible alternatives (i.e., Project = Locally Preferred/Environmentally Superior Alternative).

Economics and Financials - Rates/Available Funds-Financing Plan are not adequately and completely provided, have low levels of reliability, and especially do not reflect life-cycle costs/ability-to-pay in a planning period to 2040. As the population/employment-based models (SCAG, 2016-2040) may influence allocations of population, employment, and various fiscal/financial aspects for LA County and City, the potential source of water supply for >250,000 population would seem significant for the EIR to consider.

Secondary/Indirect Impacts - All infrastructure projects may have relatively small direct impacts but have major significant impacts in their service areas, or in the source and supply areas herein. Indirect impacts must be addressed and cannot be simply dismissed.

Growth Inducements - Land Conversion, Public/Infrastructure Services, and Utilities may be influenced by the supply of water for say >250,000 residents and would have considerable potential for growth inducements.

Environmental Justice CD2, 6, 7 vs CD1, 9, 10, 13 - "Purified Wastewater" will be sourced from the San Fernando Valley and supplied to LA areas downflow of SR-134/SR-2, and the sources and users reflect widely different socioeconomic/ethnic communities which is avoided and renders the Project description incomplete.

Programmatic vs Project EIR - As for most water resources and infrastructure projects, the Project is only a part of the SoCal-MWD/LACo/LACity water supply system and also herein the sewerage and drainage system. A programmatic EIR would be more appropriate and should deal with all recharging of surface waters to all LACounty groundwater basins, with the east-end of the SFB as only as one project within the greater program context.

Studies - Availability/Accessibility/Search-Ability - As briefly mentioned in the IS/NOP, the current Project represents only one element of a long and multi-agency development. All documents related to groundwater, advanced sewage treatment, and agencies must be hyper-linked to this, previous, and subsequent projects, and all documents must be searchable to assure public access to and knowledge of relevant contents.

We deeply appreciate the opportunities to assist in these important developing efforts on the part of DWP to assure consistent and comprehensive review of major department programs for the State of California. Again, based on comments herein and summarized above, a comprehensive Scoping Report or Scoping recirculation should be considered and implemented.

Dr. Tom Williams, Senior Technical Advisor
 Sierra Club, Angeles Chapter, Water Committee
 4117 Barrett Road, Los Angeles, CA 90032-1712
 323-528-9682, ctwilliams2012@yahoo.com

Citizens Coalition for a Safe Community

Format for Comments - General description of what is believed to be the DWP's issue of concern with
CCSC Comments: Bolded and **Italics**

GENERAL COMMENTS - *Request for consideration/inclusion in later CEQA documents (PEIR or EIR)*

Definitions/Terms - *Provide section of Definitions, Glossary, and Acronyms to be consistently and comprehensively applied throughout all documents, for example "development" for water resources is different from land use "development" and water resources development refers to an industrial sector including sourcing, reuse, recycling and retailing, such as those below:*

Reliability, Contingency, Back-up, Excess Supply

"Purified" - *pure H₂O cannot be used in cement coated pipe, therefore actual water supplied is NOT PURE WATER.*

"Transfer" *can be water transferred from non-local sources and imported and can be stored recycled or locally sourced water conveyed to another jurisdiction.*

"GW Recharge or Replenishment"

"GW exfiltration/discharge" *occurs in basin*

"Chemicals of Emerging Concerns" - **CECs**

"Product Water" *(not = produced water)*

"Reject/Brine/Waste Water" *for "purification and other treatment processes"*

ISSUES- Goals/Objectives - Purposes/Needs

Issues

Bay-Delta Emergency Plans - Delta Levee Breaches

CWP Emergency Plans - Canals/Tunnels Breaches

Global-Warming/Climate-Changes

Good Water Stewardship

Goals/Objectives-Purposes/Needs

Improve locally available supplies

Reuse of previously imported freshwater

Objective, Quantitative, and Sources

Provide industry definitions and processes for establishing "reliability" in California from the sources through delivery of water to the end-users ("The Tap").

Provide quantitative/numerical purposes and needs so that development and comparisons of alternatives can be quantitative.

Provide comparisons with total imported supplies (including Owens Valley/LA Aqueduct and any transfers from supplies north of Castaic).

Project Description must include:

All elements/components of water supply vs resources from source (treatment facility) to use (tap);

All relationships to other water resources and to other groundwater related agencies and their programs;

Source Areas for wastewater, Treatment/Recharge, and Service/Supply areas;

Rates/Available Funds-Financing Plans, including life-cycle costs and ability-to-pay.

Future Import Conditions and Physical Capacity Limits and their Reliability and Local Contingencies

Provide reliability estimates for all imported sources within the maximum capacities of existing importing facilities/systems.

Infrastructure Projects require specific physical limits or application of maximum achievable operational service - wells + spreading grounds - local water sources are additive to maximum physical service of overall physical system

Provide a complete Project Description of all existing, to be modified, and future facilities and systems, including those for various wastewaters discharged to surface waters.

Numerous other Inter-/Intra-Agency GW Projects and Programs in California, North LA Basins, and Overall LA Basins exist and are developing - CalFed, DWR/BDCP, MWD/SCAG, CWP Transfers and Pass-Throughs, Water Master - Stormwater and Adjudicated Water Rights, Orange County (MWD and Pass-Through Transfers), LA County - Sanitation and Public Works and local water districts, South and West Basin Water Districts, San Gabriel Valley Districts, and Water Departments and Companies, in addition to the LACity Dept. Public Works and Water and Power

Provide the programmatic context of this Project and opportunities for this system to be integrated with others - sources, disposition of wastewaters, groundwater storage and transfers, etc.

DETAILED COMMENTS

NOP1/1 (=page 1/ paragraph 1 of Notice of Preparation)

Los Angeles Ground Water Replenishment Project - LAGWR
Advanced Water Purification Facility - AWPf
Tertiary Effluent - Treated Recycled Water - TRW
Purified Recycled Water - PRW
AFY, cfs, etc.

DEIR must include definitions, consistent terminology, acronyms, and units (and conversions) and provide consistent application throughout documents.

Some use ground water and others use groundwater - pick one and use throughout.

Use of "purification" is confusing and must be changed.

NOP1/1 Provide graphical quantified Flowcharts and single table of all Project Components for the Project -

- a. **DCTWRP >> AWPf/PRW >> BalboaPS >> Extg/New Ppls >> 10Kft lateral Ppls >> SFB/HSG & PSG & HsTk7MG/VGS >> SFB >> Well-Pumps >> LA Central service areas**
- b. **DCTWRP >> AWPf/PRW >> BalboaPS >> Extg/New Ppls >> 10Kft lateral Ppls >> injection wells >> SFB**
- c. **Reject/Backwash Water >> relief sewer >> Relief Sewer >> Hyperion Treatment Plant HTP >> Treatment Process >> Santa Monica Bay Outfall >> SM Bay**

NOP1/2 AWPf...to treat secondary or tertiary effluent by the DCTWRP...

Provide flowchart as to where all LACity/LACo secondary and tertiary effluents may be produced and whether/how both can be used for feed source for same AWPf process.

Provide additional requirements for treating secondary compared to tertiary or Title 22 effluents.

NOP1/2

...using an existing pipeline...to the Hansen Tank at VGS

...need to be modified to reach the PSG

...new lateral...pipeline...10,000 feet...to recharge the PSG.

...would also be connected to the...[PRW]...distribution system.

Provide a flowchart and uses of all existing facilities and pipeline/power supply lines to be used for PRW and what services/flows those provide at present and how such will be provided if PRW replaces current uses/fluids.

Provide a single-paged (8x11 or 11x17) process flow diagram (high level vs detailed).

Clearly state and identify modifications of existing facilities for project functions and reassignments of existing functions to other existing or future facilities.

Clearly define transmission vs distribution system involved in any PRW facilities and define on drawings/charts.

NOP1/3 ...up to 35,000 AFY at the HSG and up to 23,000 AFY...PSG...[58,000AFY] 2/1 ...estimates that an average of 15,000 AFY of...PRW...would be recharged at both the HSG and the PSG [=30,000FY?]; excludes any injection capacity].

Provide a single table with ranges if needed regarding the maximum, median, modal, and average rates for sources/supply and recharging volumes.

Unclear as to whether 15,000 at both together or separately (15K or 30K AFY); provide clear table as to the maximum and operational typical recharge (mean/mode/median) volumes per year, per month, and per day.

Based on the above, provide estimates of groundwater production from the Project-affected downflow groundwater basin and any further treatment or other processes required for direct potable service.

NOP-2/2 Project Location

Provide clear map and sections of the groundwater basins/subbasins for those Project recharge areas, storage areas, and production areas and the probable flow-lines for recharge>> storage>> producing.

Provide map of any existing recharge areas and production wells/fields which maybe replaced or altered by the Project.

Provide LA River and tributaries map showing where river channel is recharging of or receiving groundwater from the SFB.

NOP-2/3 Potential Environmental Effects [**abbreviation of effect categories**]

Total-15: AVR, AQ, BR, CR, G&S, GHG, H&HM, H&WQ, LU&P, N, P&H, PS, R, T&T, U&SS

NOP 2/3 ...potential environmental effects of the proposed project **to be addressed in the Draft EIR...**

~~Aesthetic and Visual Resources, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, **Greenhouse Gas Emissions (excluded as Factors)**, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, (No Mineral Resources), Noise, Population and Housing, Public Services, Recreation, Transportation and Traffic, Utilities and Services Systems~~

IS2-4/1 IS-Factors included ~~NOP Effects Not Included as Factors~~ GHG included in NOP-Effects

IS2-4/1 Factors-Total 17: **A, AG, AQ, BR, CR, G/S, H&HM, H/WQ, LUP, MR, N, P/H, PS, R, T/T, U/SS, MFS** - IS2-5 - 2-22 Tables

Include all factors and effects - NOP and IS must be identical and based on an initial assessment.

Inconsistent effects and factors to be included in the DEIR are confusing and creates expectations of coverage which may be erroneous - Provide and use a single table of effects and factors and of DEIR inclusions, and those with at least one potentially significant impact.

Inconsistencies exist between summaries, tables, and texts for factors/issues/effects.

Many assessed conditions reflect only the direct effects of construction and physical operations of only the treatment and recharge elements and disregard the undefined storage, production, and services effects which could be considerable/significant and remain un-assessed or outright dismissed.

Such As - DEIR must include:

4.c No "impacts" on Biological Resources and Recreation

Effects on maintenance/raising base-flow of LA River/floodplain (100-year zones) from groundwater discharge/recharge to the river, floodplains, and wetlands must be assessed. Potential growth inducement impacts must be assessed.

Population and Housing with water supplies cheaper/larger/reliable require conversion of existing habitats unless infilling is required as mitigation, which is not referenced.,

Potential growth inducement impacts must be assessed.

6aii/iii & 6c Geology

Effects on maintenance/raising groundwater base-flow on liquefaction and foundation stability) must be assessed.

8h Hazards - increased population/housing in SFV

Potential growth inducement impacts in fire and seismically affected areas must be assessed.

9 Hydrology/WaterQuality -

Effects on maintenance/raising base-flow of LA River/floodplain (100-year zones) must be assessed with computerized model results for the affected SFB.

9b/9g/9h **Provide computerized numerical modeling results for any LA River Baseflows changes.**

Water rights not mentioned - if basin is improved who benefits other than DWP.

Provide maps/charts of: 1) all water rights and subsurface properties ownerships/leases, 2) integration of groundwater recharge with Stormwater Programs, and 3) all suitable well/caisson injection sites east of I-405.

LU-10b - significant - "Potentially Significant Impact" but not indicated on Factor table - at least one - land use planning blank but 10b indicated as significant.

Provide maps of existing groundwater uses by commercial and industrial land uses and all suitable well/caisson production sites east of I-405.

11a/b Minerals - increased GW associated with oil/gas fields in northeast SFV
Provide maps/description of all oil and gas fields, leases, and wells in LACity east of I-405.

13a Population and Housing - extension of infrastructure and supplies in SFV - **Assessments and mitigation must consider indirect, induced growth by increased water supply.**

14a Public Services - increased housing in SFV - cited as little impact but would be significant.

15 Recreation - Raising baseflow and water table levels

Changing recreational irrigation and water supplies

Assessments and mitigation must consider indirect, induced growth by increased water supply.

18a Biol/Cult Res Potentially significant cultural impact BUT biol.res. not considered significant

Assessments must be consistent and must include induced development effects on cultural and biological resources.

NO Environmental Justice -

Provide initial study for Environmental Justice issues for recycled water source and service areas and potential for increased population and urban landuses in both higher and lower socioeconomic service areas, e.g., SFValley-North of SR134-US101 and LACity south of SR-110 - same issues as for LACoDPW sanitation plants.

Growth Induced and Cumulative Impacts not discussed or dismissed

NOP-3/3 ...any reasonably foreseeable projects, programs, or plans that may have overlapping influence with the proposed project.

No definition of reasonably foreseeable and dismissal as an issue does not reflect the interrelated nature of water supplies, uses, and discharges throughout the state and especially for Southern California. As the whole concept of reliability relates to all potential sources, users, and dispositions of water resources -

Growth Inducing Impacts for the SFValley

Cumulative Effects not mention

Provide a thorough review of utilities services, road, recreation and other sectors related to potential growth inducements of service for an additional >250,000 population.

IS - Initial Study

IS-0-1 Title Page Bureau of Sanitation is included on title page.

IS-0-2 Title Page excludes Bureau of Sanitation and removed thereafter.

IS 2-1/3 **Project Sponsor's [sic, Sponsors'] Name[s] and Address[es]:**

Los Angeles Department of Water and Power **AND**

Department of Public Works, Bureau of Sanitation, Wastewater Engineering Services Division

Correct and Clarify title authority and involved Lead/Responsible Agencies and compare to Sponsors.

If BoS is included recognize in DEIR text and assure that the Board of Public Works shall review and jointly certified as appropriate in addition to the Board of Water and Power.

IS-ii - iii **Acronyms and Abbreviations** - CFS: cubic feet per second; MG: million gallons vs mgd: million gallons per day; PM_{2.5}: Particulate matter...

Provide consistent capitalization of acronyms and terms and converted values and apply consistently throughout all documents..

IS 1-1/1 1.1 Overview of the Project To **maintain the reliability** of the City's **water supply** and **reduce dependence** on imported sources of water, the Los Angeles Department of Water and Power (LADWP) proposes to **use up to 30,000 acre-feet per year (AFY)** of **purified recycled water**...for replenishment of the San Fernando Groundwater Basin (SFB).

IS 2/1 ...15,000 AFY recharged at HSG...PSG...

...Maximum Operational Flexibility...up to 13 injection wells along Canterbury Ave...

...for use when Hansen/Pacoima SG used for stormwater.

Generally poor Project Description - no flow charts, process flow diagrams, and comparisons

Provide clear definitions of reliability, dependence, contingency, and maximum operational flexibility and use consistently throughout the DEIR.

Clarify/provide in DEIR: process flow diagram(s) and flowcharts with maximum physical capacities and operational mean/mode/median annual, monthly, and daily flows.

Provide a full description of the overall SFB and the Project-affected portions of the SFB, including current recharge rates (top down) from stormwater, septic tanks, and network leakages, subsurface GW inflows, geological discharges to aquifers, artificial recharges, and private and public production withdrawals, and downstream outflow. Provide GW model for the overall SFB and the Project Affected Sub-Basins HSG, PSG, and injection wells-corridor.

Initial Study

IS1-1/1 To maintain the reliability...and reduce dependence on imported sources of water...use up to 30,000 acre-feet per year (AFY)...proposed project) consists of: 1) treatment...; 2) conveyance...; and 3) replenishment – spreading...at...(HSG) and...(PSG)...and would include installation of up to 13 new injection wells for direct injection into the SFB to increase groundwater supply by supplementing local potable water supplies.

Groundwater storage and production (4) & 5) are not mentioned but are vital to water supply Project. Reliability and dependence are not defined in regard to actual physical capacity of existing facilities. Reliability also relates to equipment and materials and their expected reliable service lives, and given the water pipe replacement periods of >200 years (or even >300 years), increases in water supplies while not replacing pipes within existing conveyance/distribution systems appears to reflect inconsistent and/or conflicting concepts in service reliability and failures.

Provide text/numerical definitions of reliability and their applications to all parts of the water supply system (e.g., sources, transmission/general conveyance, storage, treatment/production, distribution/delivery, etc.) and then provide costs for the reliabilities achieved for each system component.

ALTERNATIVES

NOP3/3 The following information would be useful to include in your response:

...you believe should be addressed in the EIR, including any suggested alternatives...

This is one of three mentions of "Alternatives" in the NOP, along with three in the IS. The purpose of scoping has traditionally been to provide for identification of reasonable community-based proposal of alternatives which has not been done in these documents.

The DEIR must provide alternatives, e.g.:

Do-Nothing/Future without Project

Locally Preferred/Environmentally Superior Alternatives,

Technically- and Financially-Feasible Alternatives,

GW Pump>Ultra-HiTreat.>Storage>Supply - Distributed/Concentrated, (T2T),

GW Pump>Treat>Supply>Recharge>Pump>Supply - Distributed/Concentrated - optimal cost sized units, say 3000AFY x 20 different sites with 60 day travel times, compared to the project, concentrated projects, 15,000AFY x 2 sites + 30 wells,

Tertiary Treat>Recharge and Pump>Treat>Supply Project without RO,

GW Recharge outside of LACity groundwater basins (GW Banking, Local/Distant "Transfers", etc.), and

Treated water source locations

SFV/SFB - Eastern, Central, and Western

LARiver - Central (SR-134 - I-10) and South (south of I-10)

Ballona Creek and West Basin (west of I-405)

Provide groundwater storage capacities with quantitative descriptions and comparisons, along with conceptual life-of-project pricing and ability-to-pay annual revenues and rates.

IS1-1/3 The EIR will also include an evaluation of alternatives to the proposed project that would reduce or avoid significant impacts, including a No Project Alternative and alternative sites for the AWPf and other facilities.

1-7/5 Groundwater contamination exists throughout the SFB...Under a separate initiative, LADWP is studying alternatives for the remediation, containment, removal and cleanup of the contaminants from easterly portions of the SFB where the City's major well fields are located.

1-16/3 Approval of the proposed project or an alternative to the proposed project, including a No Project alternative [=Future without Project]

Total of four uses of "alternatives" are included in the NOP and IS.

Only alternative sites for the AWPf and undesignated "other facilities" are to be considered.

EIR must include alternatives for:

Maximum recharge/injection capacity of proposed facilities and of all SFB treated wastewater source facilities

Recharge by injection in Central SFB areas between I-405 and SR-170 (e.g., SR-170 ROW, Burbank Airport, MTA-ROWs, LOSSAN ROWs,) and between Reseda Blvd. and I-405 (e.g., VanNuys Airport, I-405 ROW, etc.)

Provide for options (e.g., minor modifications within each alternative) and their Mitigation-Compensation Measures within any alternative or the proposed Project by each project element: Sourcing, Conveyance, Final Treatment, Recharge/Injection, GWFlow Paths/Storage, Pumped Supplies and exfiltration/discharges, and PRW Service Areas - CD1, 2, 9, 10, 13, 14, 15

IS1-5/1 with 80 million gallons per day (mgd) **[250AFD]** dry weather flow capacity. The facility provides primary treatment, biological nutrient (nitrogen) removal, filtration and disinfection (chlorination). The existing tertiary treatment system consists of two phases, with 40 mgd average flow capacity each...in single phase operation. Incoming flow has been **[administratively] limited** to 38 mgd (**42,700 AFY**) **[120AFD]**...

Project descriptions must use maximum physical capacity which cannot be changed with physical changes which in turn would be subject to CEQA considerations. If an additional 40MGD has been assessed through a certified CEQA document, then the full "unlimited" capacity must be used for subsequent or supplement or separate CEQA considerations.

Provide the basis for operational constraints of 80MGD down to 40MGD and indicate changes required to double production of potential sources to PRW operations.

1-5/2 ...flows from DCT to the lakes and the Los Angeles River vary daily and seasonally..., and have ranged on...30,300 AFY) and ...25,900 AFY)...3,360 AFY...2,250 AFY...balance of the treated flow is currently discharged to the Los Angeles River over the DCTWRP overflow weir.

Provide a single set of units (AFs or Gals or cuft...) and use of seconds, days, years, etc. and include conversion table. Best for all text references to cite a single table.

Provide in project descriptions all administrative, operational, regulatory, and legal limits, restrictions, or other non-physical constraints/controls on capacities, flows, and conditions.

1-5/3 This pump station and pipeline are currently used to **convey DCTWRP recycled water to irrigation and industrial cooling customers** in the San Fernando Valley.

As existing systems, facilities, and equipment are being used for existing recycled water, provide full description of diversion of facilities for PRW-use and any adverse effects/changes on Utilities and Services; provide for any losses of recycled water uses be balanced against Project's PRW uses.

Provide map of all treated water pipeline networks and maximum pipe and current pumping capacities

IS 1-7/1 The **City of Los Angeles** has **three major sources of groundwater** located within the Upper Los Angeles River Area: the SFB, the Sylmar Basin, and the Eagle Rock Basin. The proposed project would replenish groundwater in the SFB.

Provide definitions/delineations/descriptions of all groundwater resources, water rights, and recharge capabilities provided anywhere by DWP and/or are naturally occurring. Similarly provide map of groundwater contaminations and responsibilities assigned anywhere by DWP or other organizations having jurisdiction and authority to do so..

Provide a map of all groundwater basins and their storage and recharge capabilities and contaminations within or partially include in the City of Los Angeles.

Provide a map delineations and quantities of all water rights within and/or under the jurisdiction of the City of Los Angeles.

1-7/3 Groundwater recharge into the SFB is currently achieved **primarily through existing spreading grounds** in the San Fernando Valley. LACDPW...**HSG and the PSG...Tujunga, Branford, and Lopez Spreading Grounds...**

Define "primarily" or quantify and give maximum/mean/mode/median, standard errors, and standard deviations; provide efficiencies and receiving capacity of basins.

Provide existing or develop models of all centralized and distributed recharge for stormwater, water system leakage, and other existing sources and their influences of groundwater surfaces within the SFB-GW.

Provide description and relationships of Project spreading grounds and injection fields in relationship to all LA County related facilities in SFB. Provide SFB flow models for existing and future with/without Project flows from County facilities.

1-7/3 The HSG is located along the northwest side of the Tujunga Wash Channel...has 6 shallow spreading basins on 105 wetted acres with an estimated maximum storage volume of 1,420 acre-feet **[14ft deep]**

...receive a total maximum flow of 400 cfs [800AFD, 290,000AFY; from where]...average percolation rate is 150 cfs...from Hansen Dam and Big Tujunga Dam.

At 150cfs x105 acres (4.57Msf for 150cfs total = of 2.8ft/day; or 150 x 105ac = 12.96Mft/d x 4.57Msqft = 65MxMcf/d, 13 x 105 = 1365Maf/d), Clarify/Provide the maximum recharging capacity of the facilities with supporting calculations compared to the total available secondary and tertiary treated wastewater.

Provide equivalent units presumably af/d, af/sec, ac/hr, etc..

Provide permeability/transmissivity values for all recharging basins from ground surface to top of median groundwater table surface.

Provide typical annual inundation records for spreading grounds, including hours/depth of inundation and Maxima/Minima/Average/Median/Modes.

1-7/4 ...PSG is located on both sides of old Pacoima Wash Channel...gross area of 169 acres...basins wetted area occupies 107 acres...comprised of 12 shallow basins with a total intake capacity of 600 cfs...[1200AFD, 434,000AFY] storage volume of 440 acre-feet...percolation rate is 65 cfs...from Pacoima Dam, partially controlled flow from Lopez Flood Control Basin, and uncontrolled flow (storm flow) from East Canyon and Pacoima Wash...receives imported water for groundwater replenishment...

At 600cfs x107 acres (51.8Mcuft / 4.66Msf total = 11.3ft/day x say 100ac x 365d = 410000+ acft/yr 12.96Mft/d x 4.57Msqft = 65MxMcf/d, 13 x 105 = 1365Maf/d), clarify and provide the maximum recharging capacity of the facilities with supporting calculations compared to the total available secondary and tertiary treated wastewater.

Provide equivalent/comparable units presumably af/d, af/sec, ac/hr, etc.. that do not require recalculations/conversions for comparisons by the public.

Provide permeability/transmissivity values for all recharging basins from ground surface to top of median groundwater table surface.

Provide typical annual inundation records for spreading grounds, including hours/depth of inundation and Maxima/Minima/Average/Median/Modes.

1-7/5 Groundwater levels in the area of the SFB vary...along the western sections of the Basin at approximately 50 feet below ground surface (bgs) to between 200 and 500 feet bgs in the eastern portions... **Use of depth below ground surface is confused and almost meaningless without knowing ground surface elevations.**

Provide a ground surface and groundwater surface elevation map for the SFB and in detail for the spreading grounds and all areas downflow to the SR134 for the last ten years.

Provide groundwater piezometric surfaces for all aquifers beneath the free groundwater table for the last ten years.

IS 1.4.3 Existing Water Storage

1-7/6 ...VGS...existing 7 million gallon (MG) recycled water storage tank, Hansen Tank...

As cited elsewhere, provide flowcharts and numerical values for all existing facilities and systems and their existing uses and dependencies.

IS 1-8/2 1.5 Project **Objectives...**

The **purpose...** to **enhance the reliability...** supply by **reducing dependence on imported water supplies** and **increasing local potable water supplies...** opportunities to replenish the aquifer with additional sources of water, including **purified recycled water**, are **considered beneficial to the SFB.**

1-8/2 ...primary project **objective** related to this purpose is to **beneficially reuse advanced purified recycled water to increase recharge in the SFB.**

Define: purpose, objectives, and primary objective, then dependence/dependency, then beneficial/beneficially, etc.

Define advanced vs non-advanced purified recycled water.

Provide table of all explicit goals and objectives, quantitative/numerical equivalents, and of CEQA's purposes and needs.

Provide a quantified comparisons of all "recharging" in the SFB compared to the increase..

1-8/2 Subsequent **extraction** of this groundwater **from the SFB** will **offset...imported** water supplies with local groundwater.

One of few references to "extraction" (production), offset means replace. Provide/use single terms for the same function rather than introducing new terms, inconsistently.

Offset does not remove the system's imported capacity; system's supply capacity remains intact and actually increases by >30,000AFY, 3-5% of total imports. Therefore, increased local sources which were previously discharged to unused surface waters, e.g., HTP, represent additional supply and thereby induced growth of population, landuses, and infrastructures.

1-8/4 ...**City's right**...based on approximately **185 water right licenses**...also owns the **majority of land...and associated riparian water rights [Owens Valley]**...dropped significantly due to reallocation of water for environmental mitigation and enhancement activities.

Provide water rights, licenses and riparian water rights within the SFB and City of LA downstream of SR-134 Bridge.

IS 1-9/2 ...LADWP...**aggressive effort** to create **reliable** and **sustainable** sources of water for the **future** of Los Angeles.

Define and quantify aggressive, reliable, and sustainable.

Provide definition of future and include the planning period of SoCalAssoc.Govts. through 2040.

1-9/3 LADWP's 2010 Urban Water Management Plan set a **goal of 59,000 AFY of potable water demands to be met with recycled water by 2035** as a sustainable source of local water and to maximize reuse.

1-9/3 ...City recognized that in order to meet the water recycling goals in the Urban Water Management Plan, **beneficial reuse of up to 30,000 AFY of purified recycled water**...for groundwater replenishment into the SFB would be required. ...(proposed project) is a major element of the **RWMP**.

Provide current and projected future productions of total wastewater, tertiary treated wastewater, recycled water, and purified recycled waters.

1-9/4 ...Groundwater Replenishment Master Planning [**GRMP**] Report in 2012 as one component of the **RWMP** documents...Report summarizes the process of evaluating facilities...needed to purify recycled water...replenish the SFB.

1-9/4 ...outcome of...**GRMP**...Report is a recommendation to construct and operate an AWP located in the southwest corner of the DCTWRP and replenish the SFB through spreading at the HSG and PSG, and injection wells on Canterbury Avenue (the proposed project)....**GRMP...process considered alternative locations** for the AWP within DCTWRP and at VGS, some of which are **feasible and may be considered as part of the EIR**.

Provide both documents, GRMP/RWMP, as appendices/links with highlighted/page/paragraph references between the EIR and PRWP Project description.

NOP/IS have not referred to any specific Alternatives or Options within an Alternative or the Project.

Provide alternatives of Do-Nothing, Maximum Capacity, All Treated Wastewater for recharge via spreading grounds and injection wells.

1-9/4 **Purified recycled water**...wastewater...undergone multiple treatment steps, **beyond standard wastewater treatment**...tertiary water...further treated through advanced water treatment processes, including multiple barrier filtration (**microfiltration** and reverse osmosis) and **advanced oxidation**.

Provide detailed appendices of the Project's specifications, equipment, and facilities and when they were first used in operational facilities. Advanced filtration, reverse osmosis, and induced-oxidation (Cl+UV, H2O2+UV+O3) have been used for more than 30 years.

Purified recycled water is **near-distilled water quality** and meets the **requirements** of the California Department of Public Health and the Regional Water Quality Control Board to replenish the City's groundwater supplies.

Provide water quality comparison between a) PRW, b) Near-Distilled Water, c) Distilled Water, d) current groundwater quality, and e) expected production quality from groundwater.

Provide compilation table of ALL current "requirements", specifications, standards, conditions, ordinances, and laws by department and Board and how the Project facilities and specifications meets or exceeds the requirements.

1-9/5 1.6 Description of the Proposed Project

The Project Description is totally inadequate to establish the effects of the Project; assignment of virtually all factors/issues/sectors as potentially significant avoids many problems that would avoid recirculation of the NOP/IS but does not avoid a substantial improvement of the Project Description. A total and comprehensive revision of the Project Description is required for this Project, based on clear and concise "Purposes and Needs".

IS 1/9-5 The proposed project consists of **three components**: treatment, conveyance, and replenishment. **Actually five (5) components: 4) groundwater basin (SFB) represents the Project's storage facility, and 5) potable supply pumps and connections in order to make the Project work for water supply rather than groundwater resources. Revise and expand project description.**

Provide a much more thorough description and process flow diagrams from sewage treatment through the tap.

Provide a full, documented, and comprehensive description of the physical and hydrodynamic conditions and features of the SFB and their relationships with existing production, water rights, water levels, and streambed discharges.

IS 1-10/5 MF, RO, and...(UV/AOP) are Full Advanced Treatment (FAT) process recognized by the California Department of Public Health (CDPH) for groundwater replenishment reuse projects as currently outlined in the **Groundwater Replenishment Reuse Draft Regulations**.

No referenced sources or web-links are provided.

FAT process is not compared to "Purified".

Provide definitions for all terms and/or references for industry's standard terminologies, definitions, glossaries, etc.

IS 1-10/6 The MF process also provides an **additional barrier** to bacteria, protozoan cysts and **viruses**.

Define "barrier", e.g., 100.000 or 99.999% reduction for viruses.

Prove the statement, no reference is given for the claim regarding cysts and viruses.

1-11/ Figure 4 Proposed DCTWRP Site Plan

Includes two Project parking lots, warehouse, and maintenance facility and new but not part of Project office building, in addition to an "EQ" tank and AWPf facilities.

Provide a complete Project description for all facilities related to the Project including those to be relocated or replaced or joined with and their current uses and any displaced uses.

1-12/1...an AWPf would be constructed to treat **secondary or tertiary** effluent produced by the DCTWRP using advanced treatment technology.

Here the AWPf is rated to take secondary or tertiary treated wastewater effluent while in other text it is referenced as Title 22 effluent without clarifications as to the differences between the three influents for the AWPf.

Provide clear simple definitions of the terms and consistent usage throughout the EIR.

1-12/1 The RO process operates...influent feed water...becomes the permeate stream...remainder...waste stream (i.e., concentrate or brine)...flow ratio of permeate to feed water...system recovery...one of the main operational parameters...

1-12/3 *Treatment Capacity* The AWPf would treat up to 44 mgd (49,000 AFY) of tertiary water and generate up to 35 mgd (39,000 AFY) of purified recycled water. **[reject: 9mgd/10,000AFY]** .

1-12/4 *Treatment Byproducts* Backwash and brine are byproducts of the AWPf treatment process.

Backwash is water used to clean the MF strainers and MF membranes. Brine is generated from the RO filtration process.

Provide flowchart and numerical tables with standardized terms consistent with those use in other studies and the industry for all streams

Provide clear simple definitions of the terms and consistent usage throughout the EIR.

1-12/5 MF backwash...diverted from the AWPf into the DCTWRP in-plant sewer for treatment at DCTWRP or Hyperion Treatment Plant (HTP).

Provide quantified, including median/mean/modal, values for Backwash and Reject waters flowing to a. the Sewer, b. the Relief Sewer, and c. Hyperion Treatment Plant (and presumably to the Santa Monica Bay outfall and estuary along with all existing capacities and flows, and percentages of use of existing facilities.

Provide complete description of disposition of all reject/waste byproducts from all filtration, RO, and disinfection processes.

A new 450-foot-long, 36-inch diameter pipeline would be constructed to transfer the brine from the **proposed AWPf to the existing Additional Valley Outfall Relief Sewer (AVORS)** located within the DCTWRP property.

**Provide full description of capacities, flows, sources, and composition for the Sewer.
Provide current and project flows through 2040 with and without the Project discharges to Sewer.**

Once discharged to the AVORS, the brine would combine with other DCTWRP biosolids and flow to the **HTP** via the **La Cienega San Fernando Valley Relief Sewer for treatment.**

Frequently define/spell-out "HTP" and provide in Glossary of Terms.

Provide map and profile for all sewers/conveyances to "HTP", Hyperion Treatment Plant, and its discharges, with and without further treatment.

1-15/3 *Injection Wells* For **maximum operational flexibility**...operate up to 13 new injection wells for use **when** the HSG and PSG are **being used exclusively for stormwater spreading.**

Define "maximum operational flexibility" and "maximum capacities" for simultaneous operations.

Provide projected/plan use of wells with maximum, modal, median, and mean uses and project schedule for their use, e.g., 120 days or less, 18 storms of 3+ days = 60 days]

Each well is anticipated to have an operational capacity of 2.7 mgd, or **4.2 cfs [8.33AFD, 3041 AFY]**, to allow for direct injection of **up to** approximately **4,000 AFY** of purified recycled water in to the SFB.

Changes of units causes confusion, unless standard converted units are provided, Totals 39,530 AFY, 24/7/365 or 52,000AFY. Do not mix/use cfs or mgd without converted standards and consistently listed in acronyms/glossary. AFY does not calculate correctly from the cfs with tenths.

Each well...would be drilled to approximately **500 to 600 feet below ground surface.**

First indication of anything about the groundwater storage to be used.

Provide thorough and comprehensive geological supporting documents and studies for all geological context from 1000ft above recharge and injection areas at 800-900ft elevation to SR-134 bridges, 450ft elevation.

1-15/4 ...a single above ground wellhead site...two or three wells would be clustered together...to minimize drilling interferences...clustered injection well facility would also have a catch basin and connection to an existing storm drain for disposal of well development and test water.

Provide details and geological and groundwater context for clustering 2-3 wells compared to single well installations for 500-600ft depths.

1-15/5 ...proposed locations...in an approximately 7,000 foot corridor along Canterbury Avenue. **[Reedley-Filmore is 12,000ft]**

Piping required unknown, but presumably >7000ft and <12,000ft and must be included in the Project description.

13 injection wells - 7000ft = 1/540ft with 8AFD injection. 270ft x 2 x 300ft = wetted section - 162,000sqft, 8.33 AFD/4.2 cfs = 363,000 cfd = 2ft/d-sqft. Provide well design and analyses for spacing and depths along the proposed corridor.

1-16/3 **1.8 Required Permits and Approvals** LADWP is the project lead agency...Numerous approvals and/or permits would be required to implement the Los Angeles Groundwater Replenishment Project **[LAGWR Project].**

1-18/1 **City...Department of Public Works, Bureau of Engineering** Excavation Permits

2-1/3 **Project Sponsor's** City of Los Angeles Department of Public Works, Bureau of Sanitation

Limited mention of LADPW/Bureau of Sanitation and any needs of approvals from the Project's co-sponsor, or Board of Public Works.

Clarify and provide position/authorities of LA-DPW-BOS in the Project and any approvals, and memoranda of agreements and understandings.

1-16/3 **No references for applications, approvals, and permits by but included as a Responsible/Trustee Agency**

2-3/6 **Responsible/Trustee Agencies:** State of California Department of Public Health

Is any approval required from DPH? Provide clear responsibilities of all federal, state, regional, and local agencies and relevant authorities for each related to the Project.

2-1/2 A "No Impact" or "Less than Significant Impact" determination is made when the proposed project...for that issue area based on a project specific analysis.

As indicated in the review of factors and issues to be included in the EIR, some "less than significant impact" factors/issues are to be included in the EIR even though not warranted by initial findings. Provide all project specific analysis for each issue and direct, indirect, and induced effects.

2-1/3 **Project Location:** ...in the San Fernando Valley area of Los Angeles.

Elsewhere, projection location is more limited to the "Eastern San Fernando Valley", although the potential service area could extend well beyond the eastern portion of the SFB, when adding growth inducements for 250,000+ population, the new downflow service areas, and the lines and facilities connecting to and in HTP, and perhaps discharge outfall and zoning of mixing in Santa Monica Bay..

Provide clarification and/or refer to map or figure.

2-1/3 **City Council District:** District 6

2-2/1 **Neighborhood Council Districts:** Encino..., Lake Balboa..., Mission Hills..., Arleta..., and Sun Valley Neighborhood Councils.

If including groundwater in SFB and service areas of wells, provide map of additional LA City Council Districts to include 1, 2, and 7 etc. and add many NC districts. The Project Description must include a thorough description of the SFB and the influence of recharging at the proposed locations for flows up- and down-flow of the recharge sites.

2-2/2&3 **General Plan Designation and Zoning**

Discussion only applies to the direct facilities area, although not including the Canterbury Ave. corridor for injection wells.

The Project could provide sufficient water supply for an additional >250,000 residents and land development, but such growth inducements are not mentioned throughout the NOP/IS and thereby would not be included in the DEIR. The brief discussion herein and presumably in the DEIR must acknowledge the potential growth inducement and effects on the General Plan and Zoning outside of the immediate and direct impacts of a typical infrastructure project.

Provide thorough quantified presentation and assessment of growth inducement and any mitigative physical measures to control the maximum amounts of water supply services from the Project.

2-2/4 **Description of Project:** ...an AWPf would be constructed...to treat secondary or tertiary effluent produced...using advanced treatment technology...the AWPf...treat up to...**49,000 AFY**...and generate...**39,000 AFY**...of purified recycled water.

Flows differ from those in other text, 49K vs 50K and 39K PRW rather than others and would also vary the reject/brine waters from up to 10,000AFY down to 6-7,500AFY.

See discussion below as to provide single and consistently used set of flows and use maximal Project capacities based on facilities and equipment, not on administrative "Operating" capacity.

2-2/5 ...water...conveyed to the spreading grounds using an **existing**...pipeline...from DCTWRP and the Balboa Pump Station to the Hansen Tank at VGS...**portions of the pipeline**...extended to reach the PSG. A **new**...transmission pipeline...constructed from the **existing** 54-inch-diameter pipeline...along Canterbury Avenue to the PSG...pipeline would be approximately 10,000 linear feet...**existing**...recycled water storage tank at VGS would be connected to the **NEW** purified recycled water distribution system.

Provide the maximum, mean, mode, and median conveyance, recharging, storage, and production values and use for related factor impact assessments.

2-2/6 ...recharge up to 35,000 AFY of purified recycled water at the HSG...average of 15,000 AFY of purified recycled water would be recharged at HSG

...recharge up to 23,000 AFY...at the PSG based on the availability of supply and the annual capacity of the spreading grounds...15,000 AFY of purified recycled water would be recharged at the PSG.

All flows need to be clarified and consistently applied. Here, a total of up to 58,000 AFY could be recharge and 30,000 AFT would be recharged. Impact assessments must be made against the "maximum" production, especially when the injection wells are available for an additional 300+days a year for injection in addition to spreading ground recharging. Provide the maximum treatment, conveyance, recharging, storage, and production values and use for related factor impact assessments.

Flows differ from those in other text, 49K vs 50K and 39K PRW rather than others and would also vary the reject/brine waters from up to 10,000AFY down to 6-7,500AFY.

2-2/7 ...**maximum operational flexibility**...also construct up to 13 injection wells along Canterbury Avenue...for use **when...spreading grounds are being used exclusively for stormwater...**

Define maximum, operational, and flexibility and durations of "exclusively"

Provide assessment of typical seasonal/annual stormwater spreading (e.g., 12 - 3/4in rains requiring 3 days of spreading for each rain storm = 36 days per year) and its impact up on the PRW spreading and injection.

Provide potential recharging effect of continuous (maximum) recharging via both grounds and continuous injection recharging and potential growth inducement of maximum operating recharging capacities.

2-3/1 **Surrounding Land Uses and Setting:** The proposed project would be located in the eastern San Fernando Valley.

As a critical utility supply project within the SFB, service populations of >250,000 could be supported by the new water supplies or replaced existing supplies if not operational restricted, therefore provide new service areas in the SFB for such support, e.g., 250,000/4 =62,500+ residences with say 7.5 residences/acre = 8,300 acres of new land development infilling of Verdugo/SanRafael Hills and surrounding northern SFB hills.

Provide currently planned infilling development within the existing DWP service areas and potential for expansion of existing services for >250,000 population, >62,000 residences, and >8000 ac of infilling and new service areas.

2-4/1 Environmental Factors Potentially Affected...

Only eight (8) factors are noted in graphic form and causes confusion as to what will be included in the DEIR, and the graphic form does not correspond with those identified in the NOP.

DEIR SUMMARY

IS 2-5/-2/12 2-4 Significance >>>>>>>>> In DEIR - NOP 2/3**

		Sign	Not Sign	Not Mitigation	No Sign. Impact	
1. Aesthetic**	--	0	0	2	2	No
2. Agricult... **	--	0	0	0	5	No
3. Air Quality** xx		5	0	0	0	Yes
4. Biol...Res... **xx		0	0	5	1	Yes/Yes/Yes/Yes/Yes/No

Consistent comparisons are not made; items Less than Significant and No Impact, but still in EIR, while other Issues have been removed before comparisons - Fiscal and Employment.

5. Cult... **	xx	4	0	0	0	Yes
6. Geol.. **	xx	2	0	4	2	??/Not/Not/Not/Yes/??/Yes/No

Some items not assigned in/out of EIR.

7. GHG**... -- 00 2 0 0 0 Not Indicated in Graphic, Yes/Yes
Not included in the graphical assignments of Factors

8. Haz... **	--	xx	3	0	4	1	Yes/Yes/Not/Yes/Not/Not/Not/Not
9. Hydro... **	xx	4	0	5	1	Yes/Yes/No/No-Yes/No/Yes/No/Yes/Yes/No	

Only 4 items agreed for Yes, but 5 indicated in text for assignment to EIR.

10. Land U... ** -- 1 0 0 2 No/Yes/No
To be included in EIR but not indicated in p.2-4

11. Mineral...	--	0	0	0	2	No/No
12. Noise**	xx	4	0	2	0	Yes/Yes/Yes/Yes/No/No
13. Popul... *	--	0	0	0	3	No/No/Nor

50,000afy = 2.2Bcf = 16.3Bgal = 44.6MGD = 223-357,000 pop @ 200-125gal/p-d

As existing facilities can continue to supply existing service populations, addition of about 10% of the total existing service population (estimated for 125 gal/person-day) can supply an additional population within the DWP service area, >250,000 population within the San Fernando Valley. Population and Housing must be included the EIR primarily as secondary/indirect effects and their impacts.

14. Pub...Ser.. **-- 0 0 2 3 No/No/No/No/No

As the Project can supply >250,000 population within the SFB, additional service areas can be added and are not prohibited, and thereby all public services - police, fire, and other services and facilities would be required and need financial support.

15. Recr...** -- 0 0 0 2 No/No

As the Project can supply >250,000 population within the SFB, additional service areas can be added and are not prohibited, and thereby all public services - recreation, education, and other services and facilities would be required and need financial support.

Transport..** xx 3 0 1 2 Yes/Yes/No/No/No/Yes

As the Project can supply >250,000 population within the SFB, additional services, facilities and roads area can be added and are not prohibited, and thereby transportation services and facilities would be required for the new population and their transportation needs.

Utilities...** xx 3 0 3 1 Yes/Yes/No/No/Yes/No??/No

As recharging is constrained by stormwater drainage, at least drainage must be included in the EIR.

As the Project can supply >250,000 population within the SFB, additional service areas can and would be added and is not prohibited and thereby Water Supply facilities would be required.

As the Project may compete with stormwater recharging and may be in conflict regarding the water quality within the groundwater reservoir, a thorough quantitative model and comparisons must be included in the EIR.

Mandatory... xx 3 0 0 0 Yes/Yes/Yes No mention in NOP

The Project NOP does not start with the basic CEQA document, NOC/EDT (Notice of Completion & Environmental Document Transmittal), including the issues listing, "Project Issues Discussed in Document", which includes a fuller ranges of issues than those provided in the current documents.

Current Scoping documents specifically exclude the following issues/sectors: Fiscal, Economic/Jobs, and Growth Inducement.

Provide review of ALL issues/factors and quantified assessment of significance and requirements for mitigation.

IS 3-4/2 - 3-6/2

AIR QUALITY

As indicated elsewhere, air quality is affected indirectly by existing populations which could not reside in the service areas without piped water supplies. Provide assessment of induced air emissions for >250,000 population and >8,000 ac of land development.

2-6 IV. BIOLOGICAL RESOURCES. Would the project:

IS 3-6/3 - 3-8/3

IV. BIOLOGICAL RESOURCES

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, **sensitive, or special status species** in local or regional plans, policies, or regulations...?

b. Have a substantial adverse effect on **any riparian habitat or other sensitive natural community**

identified in local or regional plans, policies, regulations...?

c. Have a substantial adverse effect on **federally protected wetlands**...(including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, **hydrological interruption, or other means**?

d. Interfere substantially with the movement of any native resident or **migratory fish or wildlife species** or with established native resident or migratory wildlife corridors, or impede...**use of native wildlife nursery sites**? **LA River Riparian Corridor (SR-134-Broadway Bridge)**

No information is provided regarding groundwater recharge impacts on groundwater levels south of SR-134 (or anywhere between the recharge/injection areas and the LA River) and on supported riparian vegetation and associated aquatic and wildlife species.

Provide setting on existing riparian/wetland habitats and associated groundwater resources and then assessment of groundwater changes and their effects on dependent biological resources.

Similarly, provide assessment of well pumping-induced groundwater changes and their effects on dependent biological resources, including expansion of wetlands and flooding of riparian trees.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? **Raising groundwater may devastate California Sycamore and other protected trees in riparian woodlands of the LA River Riparian Corridor (I-5/SR-134 to Broadway Bridge).**

Provide assessment of induced groundwater changes in the LA riparian habitats downstream of the I-5 bridge over the LA River.

As indicated elsewhere, biological resources are affected indirectly by existing populations and land conversions which could not exist in the service areas without piped water supplies.

Provide assessment of induced air emissions for >250,000 population and >8,000 ac of land development.

f. Conflict with...adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? **LA River Riparian Corridor (SR-134-Broadway Bridge)**

No Impact or less than significant impacts

As indicated elsewhere, biological resources are affected indirectly by existing populations and land conversions which could not exist in the service areas without piped water supplies. Provide assessment of induced air emissions for >250,000 population and >8,000 ac of land development.

2-7 VI. GEOLOGY AND SOILS. Would the project:

3-9/3 - 3-11/4

VI. GEOLOGY AND SOILS

a. Expose people or structures to potential substantial adverse effects...involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map...for the area or based on other substantial evidence of a known fault?...

ii) Strong seismic ground shaking? iii) Seismic-related ground failure, including liquefaction?

iv) Landslides? **No or less than significant**

As indicated elsewhere, geological resources and related seismic effects differ in ground conditions and dependent urban developments throughout the SFB and downstream, and they are affected indirectly by future induced land conversions which could not exist in the service areas without piped water supplies.

Provide setting on existing ground movement and liquefaction zones and related groundwater levels.

Provide assessment of induced exposure to existing seismic risks for >8,000 ac of land development and of changes in groundwater and liquefaction risks downflow of the recharge areas.

3-14/5 - 3-18/1

IX. HYDROLOGY AND WATER QUALITY

3-15/2 Upon completion of the proposed project...the EIR will include an **analysis of water quality associated with replenishment of purified recycled water into the SFB.**

Provide complete surface/subsurface hydrological setting and water quality conditions for stormwater, groundwater replenished by stormwater (5000ft downflow from recharge), other existing non-purified recharging sources/downflow conditions, and the Project's "purified" recharge/downflow conditions and comparisons for the same against existing groundwater conditions and compositions.

Provide assessment of changes in surface and subsurface flows for recharges and discharges of groundwater.

3-12/4 - 3-14/4

VIII. HAZARDS AND HAZARDOUS MATERIALS

Provide map and inventory of all hazardous materials/wastes sites downflow of recharge basins and those likely to be affected by raising groundwater levels along the LA River from I-5 bridge downstream to C.Chavez Bridge.

3-18/2 - 4

X. LAND USE AND PLANNING

3-21/2 - 3-21/4

XIII. POPULATION AND HOUSING

Would the project: a) Induce substantial population growth...directly...or indirectly...?

No Impact. ...The proposed project **would increase groundwater replenishment** and groundwater supplies in the SFB...project is intended to serve existing customers and would **reduce reliance on imported water sources.** Therefore, the proposed project would **not result in indirect population growth.** No impact to population growth would occur, and no further analysis is required. **No Impacts**

Strongly disagree as indicated elsewhere. Administrative/operational controls can be easily overridden and water supply system expanded to meet 2040 population growth through expansion of R-1 and other zonings in SFB.

Unless physical systems are bottlenecked, or downsized statement cannot be justified, and indirect population growth in the SFB must be included and mitigated in the EIR.

Provide assessment of a reasonable projection of land development (densities and areas) suitable for >250,000 within the SFB through 2040.

3-22/1 - 3-23/4 XIV. PUBLIC SERVICES

3-23/5 - 3-24/2 **XV. RECREATION No Impacts**

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered...facilities,...in order to maintain acceptable service ratios, response times or other performance objectives...

i) Fire protection?...As the proposed project would serve existing customers, it would not generate population growth.

As indicated in Sec.s XII-XIII, indirect population growth can result in land development and needs for utilities expansion and increases through the plan period of 2040.

Provide assessment of indirect effects and impacts of/from induced land use, population and housing, and their typical utilities and services.

Provide assessment of indirect effects on stormwater drainage from induced runoff from >8,000 ac of land development.

3-22/5 ii) Police protection? **Less Than Significant Impact**...local law enforcement agency responsible for providing police protection services...As previously stated, the proposed project would not generate population growth.

As indicated in Sec.s XII-XIII, indirect population growth can result in land development and needs for utilities expansion and increases through the plan period of 2040.

Provide assessment of indirect effects and impacts of/from land use, population and housing, and utilities and services.

3-23/2 iii) Schools? **No Impact.** As the proposed project does not include development...no increase in residential population would occur...proposed project would serve existing customers and is intended to reduce reliance on imported water supplies. Therefore, no indirect population growth would occur. No new students would be generated...and no further analysis is required.

As indicated in Sec.s XII-XIII, indirect population growth can result in land development and needs for utilities expansion and increases through the plan period of 2040.

Provide assessment of indirect effects and impacts of/from land use, population and housing, and utilities and services.

3-24/3 - 3-25/5 **XVI. TRANSPORTATION/TRAFFIC**

As indicated in elsewhere, indirect population growth and resulting land development would induce additional roads and highways which would generate indirect impacts on other environmental sectors.

Provide assessment of indirect effects and impacts of/from land use conversions and road systems and their operations indirect effects on air quality (e.g., >60,000 residences generating 600,000 daily trips).

3-26/1 - 3-27/3 **XVII. UTILITIES AND SERVICE SYSTEMS**

IS 3-26/ **XVII. UTILITIES AND SERVICE SYSTEMS** Would the project:

3-26/1 a) EXCEED wastewater treatment requirements of the applicable Regional Water Quality Control Board? (emphasis added)

Potentially Significant Impact. The proposed project involves increased groundwater replenishment...to reduce dependence on imported water supplies.

Project does not eliminate imported supplies by 30-50,000AFY which remains within the capacity of the import conveyance systems.

As indicated in Sec.s XII-XIII, indirect population growth can result in land development and needs for utilities expansion and increases through the plan period of 2040.

Provide assessment of indirect effects and impacts of/from land use conversions and expansion of utilities and services in the San Fernando Valley.

3-26/1 ...wastewater discharged by the proposed project must comply with National Pollutant Discharge Elimination System requirements.

...purified recycled water would be conveyed to injection wells and spreading grounds for replenishment into the SFB. Waste discharge would be generated at the AWPF.

NPDES applies for local discharges to drainage system and would preclude any PRW/AWPF wastewaters (brine/reject waters) and if treated would incur significant costs and require disposal components

No discussion of disposal of reject/brine from the purification process.

Provide full analysis of discharge and eventual disposition of all wastewater from the AWPf and related facilities to the sea and indirectly for the conversion and operations of >60,000 new residential units.

3-26/1 Therefore, the EIR will include an analysis of the proposed project's impacts on the wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board.

Provide full disclosure of the groundwater rights for the recharge areas and those subsurface areas receiving recharged groundwater.

In order to use stored PRW, wells must be drilled, operated, and connected to distribution networks which are not discussed.

Provide probable well sites and service areas zones for recovery of recharged PRW.

3-26/2 b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

3-26/2 **Potentially Significant Impact.** ...project involves the construction of a new wastewater treatment facility, which has the potential to result in significant environmental impacts...in applicable sections of the EIR.

As an EIR, this section must focus on direct impacts of both the direct facilities required for the treatment-conveyance-recharge AND, indirectly, the locally increasing groundwater levels/pressure within the "managed" storage aquifers AND the supply production facilities (e.g., wells, caissons, etc.), both of which have been avoided in the Scoping for the Project.

Provide thorough assessment of direct effects of increasing strengths and flows of project generated wastes and for indirectly generated flows from >60,000 dwelling units.

3-26/2 The EIR will also evaluate the potential impacts to the City of Los Angeles' **Hyperion Treatment Plant [HTP]** and the **Publicly Owned Treatment Works (POTW)** due to an increase in process byproducts from the AWPf.

Inclusion of HTP and undefined POTW(s) greatly broadens the assessment of effects of this "flagship" project on all wastewater treatment facilities in LACity and LACo.

Provide a comprehensive flowchart of all materials from the generation of the feedstock to the production of PRW-from wells and to the final disposition of the filtrate/reject/brine wastewater from the AWPf.

Provide a comprehensive assessment of wastewater flows on HTP and other POTWs from induced wastewater flows within the San Fernando Valley.

3-26/3 c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Injection (not producer) wells are included and can/must be operated whenever stormwater is being recharged and beyond. They can be operated totally separate from the existing stormwater recharge on spreading grounds for maybe 30-45 days. So far, no information has been provided, and DEIR must include maximum stormwater recharge operational and physical components, and how the wells' production can be used year-around.

Purified recycled water recharges can occur throughout the year. However if the imported water supply remains constant and PRW is recharged and recovered, the total DWP water supply would increase to allow increase in users within the service area or in service areas.

No provision is made in the Project to assure that water imports would not increase even with the recharge and supply of 30-50,000 AFY of PRW. Similarly, DWP has reported that water transfers are assigned to local water even though they are largely transferred from holders in the San Joaquin Valley and delivered via imported water systems.

Unless DEIR includes PHYSICAL limitations on imported water rather than an "administrative statement", DEIR must include the PRW as additional supply and as definite inducement for increased development of the service areas and impervious land uses requiring major increases in stormwater systems and opportunities for stormwater recharge spreading grounds.

Provide assessment and appropriate mitigation to assure no inducement of future population growth and land use conversion occurs due to increasing water supply capacities in the San Fernando Valley, or elsewhere.

3-26/3 **Less Than Significant Impact.** ...use existing City and County facilities and public roadway rights-of-way...all drainage flows would be routed through existing storm water infrastructure serving the project site and surrounding areas. Following construction...flows would be similar to the current condition...would not require or result in the construction or expansion of storm water drainage facilities...less than significant, and no further analysis is required.

As indicated elsewhere, growth inducements and related impervious land use development would alter runoff.

XX

3-26/4 d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Provide entitlements and water rights for existing flows of less-than-purified recycle waters (presumably downstream along Los Angeles River)

Provide current groundwater entitlements/rights/assignments and how the recharge of additional treated waters and stormwater will alter groundwater levels in the SFB.

3-26/4 **No Impact. High water demand.**...increase groundwater replenishment in the SFB **to reduce dependence on imported water supplies.**

3-26/4 ...**additional water supplies** would not be needed. No impact would occur, and no further analysis is required.

Dependence is not defined and in fact purified recycled water totally depends on the water supply which is largely imported water to the DWP service area. If the imported water supply remains constant and PRW is recharged and recovered, the total DWP water supply would increase to allow increase in users within the service area or in service areas.

No provision is made in the Project to assure that water imports would not increase even with the recharge and supply of 30-50,000 AFY of PRW. Similarly, DWP has reported that water transfers are assigned to local water even though they are largely transferred from holders in the San Joaquin Valley and delivered via imported water systems.

DEIR must include PHYSICAL limitations on imported water rather than an "administrative statement" which has no means of assuring "reduced dependence on imported water supplies". Without real limits, DEIR must include the PRW as additional supply rather than replacement and as definite inducement for increased density or expansion of the service areas and demands which would be met through existing importation facilities.

Provide assessment and appropriate mitigation to assure no inducement of future population growth and land use conversion occurs due to increasing water supply capacities in the San Fernando Valley, or elsewhere.

3-27/4 - 3-28/7 XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

The pivotal issue for the EIR is cumulative effects of indirectly supported service area populations and their impact upon the SFB and western and northwestern LA County. As indicated elsewhere, the Project does not replace existing facilities and systems but would provide a contingency or reliability factor of 30,000+ AFY of water supply. No measures have been provided to assure that if administratively or operationally decided, the groundwater production could be increased while also importing at maximum capacity from the CWP or "Transfers".

The DEIR must assume that unless physically constrained the total physical capacity of sources and systems can be and will be used, especially as such use would be financially rewarding to the Project proponent as the same capital costs plus a minor increase in operating costs would generate higher "net surplus revenue" (=profit) for the Project proponents and the City of Los Angeles.

All comments, herein, assume that the increased recycling for potable uses will support larger populations especially in the San Fernando Valley, especially east of I-405 and north of SR-134.

a) ...potential to substantially degrade the quality of the environment,...or eliminate important examples of the major periods of California history or prehistory? **Potentially Significant Impact**...search for State and/or federally listed species in the vicinity...part of the EIR...potential for special status species...in the project vicinity...including direct impacts due to vegetation removal and indirect impacts to nearby habitats and river 3-28/1 flows...Impacts to biological resources...in the EIR.

3-28/2 ...potential to impact important examples...California history or prehistory...will be assessed, and impacts...in the EIR.

No discussion of the "Quality of the Environment" is provided; provide expanded assessment beyond that of only biological and cultural resources, especially those related to growth inducement and changing groundwater levels.

Without a clear description of the existing/changing groundwater basin (SFB), production wells, and elevations along the southeastern drainage channels from rising groundwater levels from the PRW and stormwater recharge, the Project may affect riparian habitats along the channels downstream/flows of the Project.

Biological resources must be assessed along affected downstream channels that may be affected by rising groundwater levels above the channel elevations.

3-28/3 b) Does the project have environmental effects that are individually limited, but cumulatively considerable...incremental effects of a project are significant when viewed in connection with the effects of **past...other current...**, and...**probable future projects**...

As indicated elsewhere, the Project will significantly affect the population, land uses, and related utilities, services, and transportation sector which may be each significantly adverse and taken together be significantly considerable.

Provide a thorough and comprehensive assessment of induced growth and mitigation required to constraint the growth and induced considerable impacts.

3-28/4 **Potentially Significant Impact**...a non-attainment area for O3, PM10, and PM2.5...potential to generate **pollutant emissions** in **excess of the SCAQMD thresholds** and contribute to a **cumulatively considerable** impact...included in the EIR.

Cumulative traffic impacts can arise from the direct conditions of arising from the Project, including pumping facilities and from the service area which could be expanded for the new water supplies along with the supply from existing facilities at the same reliability measures as those existing now.

Estimate vehicular exhaust emissions from potential service area expansion (for >250,000 population) and potential for increased traffic generation from such expansion (e.g., >60,000 dwellings x 4+ trips per dwelling per day = +300,000ADT).

3-28/5 ...**GHG emissions**...cumulative by its very nature...threshold of significance and climate reduction strategies...would generate short-term emissions of GHGs...and long-term emissions...may exceed CARB's thresholds of significance...in the EIR.

No mention is made regarding the Project nor growth induced sources of GHGs from such cumulative sources and their impacts.

DEIR must include GHG sources of temporary/permanent and direct/indirect, and growth inducement of the land development, population growth, and traffic/transportation in the San Fernando Valley resulting from the Project and all of its components, including potential for 300,000+ population, 75,000 residences, 10,000 ac of land development, and 500,000+ Aver.DailyTrips.

3-28/6 ...permanent or temporary increases in ambient noise levels, and contribute to a cumulatively **considerable noise impact**...in the EIR.

Although noise is assigned as a cumulatively considerable impact, no discussion is provided for such determination nor inclusion as a stand-alone factor/sector of the DEIR.

No mention is made regarding the Project nor growth induced sources for such cumulative impacts. DEIR must include noise/vibration sources of temporary/permanent and direct/indirect, and growth inducement of the land development and population growth in the San Fernando Valley resulting from the Project and all of its components, including potential for 300,000+ population, 75,000 residences, and 10,000 ac of land development.

3-28/7 ...traffic analysis...include **cumulative traffic impact**...have the potential to result in significant impacts on area roadways...in the EIR.

Cumulative traffic impacts can arise from the direct conditions of arising from the Project, including pumping facilities and from the service area which could be expanded for the new water supplies along with the supply from existing facilities at the same reliability measures as those existing now. Estimate the potential service area expansion (for >250K population) and potential for increased traffic generation from such expansion (e.g., 60,000+ dwellings x 4+ trips per day = >250,000ADT).

3-28/8 **c) ...environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?**

3-28/9 **...Potentially Significant Impact...**could have potentially significant impacts to human beings...**hazardous materials release or air quality**...discussion of direct and indirect project impacts on human beings.

Chemicals of Emerging Concern and viruses have been hazards which have been restricting increased use of recycled water since 1970, provide a thorough discussion of the initiation, development, and current status of potable water quality issues related to "Toilet to Tap" (T2T) and Toilet-to-Aquifer-to-Tap (TAT) and responses to issues related both chemical and viral hazards and summaries/bibliographies/addresses of all relevant studies, reports, and documents.

As indicated elsewhere, various filtrates will be removed from the multi-barrier filtration/purification process to be used, provide a thorough description and assessment of the collection, conveyance, and disposition of the filtered reject waters and precautions used for controlling the hazard risk to humans and the environment.

Provide a comprehensive and indepth study of CECs and their level/risk of hazards for direct and indirect (Project) recycling of purified sewage.



Metro

Metropolitan Transportation Authority

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October 21, 2013

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

**RE: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the
Los Angeles Groundwater Replenishment Project**

Dear Mr. Mercado:

The Los Angeles County Metropolitan Transportation Authority (LACMTA) is in receipt of the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Los Angeles Groundwater Replenishment Project. This letter conveys comments concerning issues that are germane to LACMTA's statutory responsibilities as well as LACMTA's facilities and operations in relation to the proposed project.

LACMTA, in coordination with the City of Los Angeles, is conducting an Alternatives Analysis on the East San Fernando Valley Transit Corridor project included in the Measure R Expenditure Plan approved by the voters of Los Angeles County in November, 2008. Among the transit alternatives being evaluated is bus rapid transit (BRT), light rail transit (LRT), or a street car that would operate along Van Nuys Boulevard. Should an alignment along Van Nuys Boulevard be selected, construction of the East San Fernando Valley Transit Corridor project may coincide with the proposed pipeline installation along Van Nuys Blvd at this location. Coordination between the project sponsor, LACMTA, and the City of Los Angeles will be needed to eliminate potential construction conflicts. For more information on the East San Fernando Valley Transit Corridor alternatives analysis please contact LACMTA Project Manager Walter Davis at 213-922-3079.

Several transit corridors with Metro bus service could be impacted by the proposed pipeline installation. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines, (e.g. Lines 166-364 on Osborne, Lines 233-761 on Van Nuys, and other pull-out routes that cross the Canterbury Avenue proposed pipeline). Other Municipal Bus Service Operators including LADOT may also be impacted and therefore should be included in construction outreach efforts.

If repair or replacement of existing pipeline is required that runs under the Metro Orange Line Busway or the Metrolink ROW, additional coordination and permits will be necessary from LACMTA.

Additionally, LACMTA is under statutory obligation to notify the project of their responsibilities to the State of California Congestion Management Program (CMP) statute. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the CMP statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

We look forward to reviewing the Draft Environmental Impact Report. If you have any questions regarding this response, please contact Marie Sullivan at 213-922-5667 or by email at sullivanma@metro.net.

Sincerely,



Nick Saponara
Development Review Manager, Countywide Planning

Attachment: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- Evidence that affected transit operators received the Notice of Preparation.
- A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
 - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
 - For each time period, multiply the result by one of the following factors:
 - 3.5% of Total Person Trips Generated for most cases, except:
 - 10% primarily Residential within 1/4 mile of a CMP transit center
 - 15% primarily Commercial within 1/4 mile of a CMP transit center
 - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
 - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
 - 5% primarily Residential within 1/4 mile of a CMP transit corridor
 - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
 - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

Mercado, Michael

From: Joyce Dillard [dillardjoyce@yahoo.com]

Sent: Monday, October 21, 2013 3:52 PM

To: Mercado, Michael

Subject: Comments to LADWP NOP Los Angeles Groundwater Replenishment Project due 10.21.2013

This is a citywide project and availability of documents should be spread across the City including the Central Library and regional libraries.

You are under an illusion with this statement:

To maintain the reliability of the City's water supply and reduce dependence on imported sources of water

This is a form of water supply necessary for the by-right density the Planning Department intends in their policies.

Delivery to areas of density need to be considered, as this is Valley-oriented in its discussion. Density will occur for Transit-Oriented Districts.

Also under consideration should be annexed areas, such as Hidden Creek Estates and development such as Universal City as well as the increased density around the LA River Restoration Plans. Hotels are planned around the Downtown area for economic development of the Convention Center. Purple pipe installation is not addressed thoroughly.

You need to clearly anticipate delivery of acre feet in normal weather and storm conditions and the available capacity under several conditions.

LA County Flood Control and its responsibilities need to be clear. They are not and their usage effects the amount of groundwater to be replenished.

Department of Planning should be at the table in this process as they do not regard water supply and water quality issues past your Water Supply Assessment approvals.

Brine disposal needs to be addressed with the transfer to the Additional Valley Outfall Relief Sewer (AVORS).

The transmission pipeline in the vicinity of Canterbury Avenue and Filmore Street for the injection wells needs analysis of the surrounding area-residential, schools, hospitals etc.

We are not clear on the environmental effects of this installation in relationship to Health Risk of the surrounding populations including sensitive populations. A Health Risk Assessment needs to be executed.

Vector control is not addressed.

10/22/2013

Fire Response Times and any Emergency Services should be addressed.

Integrated Resource Plan (Bureau of Sanitation) is outdated and needs to be updated as the capacity at Tillman has changed.

We are not clear how Air Quality will be impacted on an ongoing basis. Please list the chemicals will affect that Air Quality. State Implementation Plan is not in compliance with Federal standards. Please address the effects.

You did not mark the checklist for Greenhouse Gas Emissions or Land Use Planning yet show them as a Potentially Significant Impacts.

It is not clear the anticipated impacts of the LA River Ecosystem Feasibility Study with the US Army Corps of Engineers.

What additional pollutants loads are expected for the TMDLs Total Daily Maximum Loads and what are the mitigation and monitoring plans.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031



ARLETA NEIGHBORHOOD COUNCIL

October 28, 2013

Project Title: Los Angeles Groundwater Replenishment Project

Lead Agency Name and Address:

Los Angeles Department of Water and Power
Environmental Planning and Assessment
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Contact Person:

Michael Mercado
Environmental Affairs
Los Angeles Department of Water and Power
michael.mercado@ladwp.com
(213) 367-0395 Fax: (213) 367-4710

Public Comments in Response to Notice of Preparation:

Of paramount concern to the well being and good health of Arleta residents is the disruption, noise and air pollution from construction activities along any route LADWP decides to chose for drilling injection wells and placing water piping - and the extent to which adverse impacts to our community will be ameliorated and mitigated.

We understand additional Public Comment periods will be provided by LADWP for this project as decisions are made for the piping route, means, methods, materials, operations and outcomes.

Item A: We urge LADWP study Alternative Routes the pipeline may run, including along the Pacoima Wash and to describe traffic impacts.

At this early project stage, no route is finalized, so LADWP has agreed to consider alternate routes to Canterbury Avenue such as Los Angeles County Department of Public Works Flood Control District Easement following the Pacoima Wash. A consideration studied will be the effort and expense involved to negotiate and secure an easement to be held by LADWP within the County easement. An advantage to trenching the 42 inch diameter cementitious water piping and vertical cleanout accesses within the Wash easement is the absence of traffic, residential or school activities, and access concerns to slow construction. So the project cost would be lower from the lack of interference with pre-existing activity and the related costs. Main ingress and egress access points to the Wash remain a Project consideration to mitigate any impact with pre-existing activity. Controlling access points to main ingress and egress points may require additional fencing or security.

Trenching along the Wash embankment offers an opportunity for the community to gain a jogging and non-motorized bike path from the necessity of covering the trench in any event. This way, the jogging path surfacing delineates the pipeline below. Its a clear win-win for both the community and LADWP.

Wherever the final route is scheduled, LADWP will provide noise abatement measures such as sound blanketing and electronic white noise offsets. Soil studies of each route considered will be undertaken to assess the cost factor in soil stabilization and compaction, and seismic measures.

LADWP will utilize open trenching to lay piping at the rate of about 60 to 70 linear feet per day.

Electric, LNG and or CNG Trucks to meet State regulations are recommended to ease health impacts on residents, in addition to all project materials, methods, means, and operations observing and complying with California's AB 32 Climate Mandate law to lower carbon emissions and transition to a renewable energy economy. Construction impacts from simultaneous ongoing projects such as Metro's proposed Light Rail on Van Nuys Boulevard and nearby LADWP Tujunga Spreading Grounds project.

Item B: How will LADWP lower dust and particulate matter during the construction phase?

LADWP will provide continuous water spray from trucks to maintain lower carcinogenic and allergens associated with air pollution particulate (dust).

Item C: How will construction affect traffic at the California DMV site located at Canterbury Avenue and Van Nuys Boulevard? And how will LADWP mitigate construction at and surrounding Canterbury Elementary School?

Activity centers such as California Department of Motor Vehicles, Canterbury Elementary School will involve open trenching techniques for laying pipe.

Construction activities are to be coordinated with Canterbury Elementary School Administration to occur at off-peak times, likewise, construction activities for the entire route are to be segmented over one block at a time, on weekends, during summer break, not at night or during commute times. Any segment under construction may be one-way traffic to ease detouring.

Canterbury Avenue was not originally built as a collector road feeding major arterials such as Filmore Street, Van Nuys Boulevard, Terra Bella Street, Osborne Street, Branford Street, but over time, residents came to rely on Canterbury Avenue as a main collector street more so than surrounding connectors to arterials. Adding seismic resistance required of the new piping to the existing capacity of Canterbury Avenue's designed street loading needs to be evaluated. Canterbury Avenue will be restored to the previous condition, at a minimum.

One advantage of Canterbury Avenue incurring less disruption to pre-existing human activity is that only one side has residential dwellings or school buildings while the other side is unpopulated, providing an easement for high voltage lines.

Item D: We are concerned about safety issues with the project for the children at Canterbury Elementary School.

To quell all safety concerns for children, barricading or fencing would keep children at a safe distance. LADWP will employ measures to keep noise level down mindful of not interfering with indoor and outdoor school activities. Steel plating will be placed over all open trenching.

Item E: What are Arleta Community impacts and mitigation of the project's various types of construction?

To minimize risks to public safety and to lower traffic disruptions at major Street arterials crossing Canterbury Avenue, Horizontal Sub-surface Drilling (jacking) will be employed for placement of piping. Vertically excavated double barreled cored tunnels either 100 feet, 200 feet, or 300 feet in length are terminated as north and south portals (jacking pits). Additional construction activity/disruption from jacking pits will be considered at either terminus.

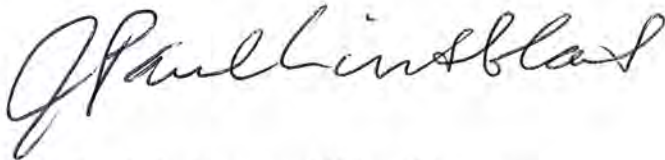
All construction areas including jacking pit portals, trenching, and injection wells will have visual, audio and security screening.

Item F: How can LADWP address long-standing community deficiencies, such as awareness of the need to conserve water, enjoyment of close-by recreational parkland, community gardens, and contributions by LADWP to the affordability of staying connected to power and water utilities and alternatives such as solar photovoltaic panels and rainwater harvesting?

We urge LADWP Pacoima Spreading Grounds Project and Los Angeles Groundwater Replenishment Project, two adjacent, close-in-proximity projects be linked together and presented to the Public as an illustrative, educative pocket park-contained outreach of LADWP's effort to develop local water supply for human consumption, for irrigation, to recharge our aquifer, and to expand water conservation while providing much needed increases in active and passive recreational park areas.

Conceived at LADWP's Donald C. Tillman Water Reclamation Plant, not a part of this Los Angeles Groundwater Replenishment Project, south of Japanese Garden, is an existing educational demonstration display open to the Public, showing Public outreach illustrating the overall water conservation and filtration process.

Prepared and Submitted by:



Jack Lindblad, Architect and Urban Planner,
Arleta Neighborhood Council Community Improvement Committee Chair Emeritus



Sergio Ibarra, MPA,
Arleta Neighborhood Council President



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

NOV 05 2013

In Reply Refer to:
MSM: 266.0

Los Angeles Department of Water and Power
c/o Mr. Michael Mercado
111 North Hope St, Room 1044
Los Angeles, CA 90012

Dear Mr. Mercado:

POTENTIAL REQUIREMENT FOR WASTE WATER CHANGE PETITION RELATED TO LOS ANGELES GROUNDWATER REPLENISHMENT PROJECT (SCH # 2013091023) IN LOS ANGELES COUNTY

Staff from the State Water Resources Control Board (State Water Board), Division of Water Rights (Division) has determined that you may need to file a petition pursuant to Water Code section 1211.

Water Code section 1211 requires owners of waste water treatment facilities to file a petition and receive approval from the State Water Board before making any changes in the point of discharge, place of use, or purpose of use of treated waste water where the change in the discharge or use of treated waste water would result in a decrease in the flow in any portion of a watercourse.

Information on the waste water change petition process is available at the Division's web site at: <http://www.waterboards.ca.gov/waterrights/>

If a petition is needed, the State Water Board will act as a Responsible Agency for this project. Accordingly, the State Water Board may need to rely on the Lead Agency's California Environmental Quality Act (CEQA) document to support the Division's evaluation of the requested approval. The Lead Agency should therefore ensure that any CEQA document prepared for the project considers all potential direct and indirect environmental impacts associated with the change.

Unauthorized diversion or use of water is considered a trespass and subject to enforcement action under Water Code sections 1052 and 1831. Any trespass may be subject to Administrative Civil Liability of up to \$500 per day without further notice. The State Water Board also may issue a Cease and Desist Order in response to an unauthorized diversion or use of water or threatened unauthorized diversion or use of water pursuant to Water Code section 1831.

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, Ca 95812-0100 | www.waterboards.ca.gov

NOV 05 2013

Please contact me at (916) 341-5383 or mitchell.moody@waterboards.ca.gov if you have any questions or require additional information. Written correspondence or inquiries should be addressed as follows: State Water Resources Control Board, Division of Water Rights, Attn: Mitchell Moody, P.O. Box 2000, Sacramento, CA, 95812-2000.

Sincerely,



Mitchell Moody, P.E.
Water Resource Control Engineer
Division of Water Rights

cc: California Department of Fish and Wildlife
c/o Ms. Betty Courtney
3883 Ruffin Rd
San Diego, CA 92123



UPPER LOS ANGELES RIVER AREA WATERMASTER
Richard C. Slade - Watermaster

ularawatermaster.com

12750 Ventura Blvd, Suite 202
Studio City, CA 91604

818-506-0418 PHONE
818-506-1343 FAX

MEMORANDUM

November 11, 2013

To: Serge Haddad
(sent via Email: serge.haddad@ladwp.org)

From: Richard C. Slade
ULARA Watermaster

Job No. 500-LAS01

Re: Summary of Preliminary Comments to
"Initial Study, Los Angeles Groundwater Replenishment Project",
Prepared by LADWP & Others; September, 2013

As Watermaster for the Upper Los Angeles River Area (ULARA), I have prepared this Memorandum to provide the following summary of my preliminary comments regarding the Initial Study for the Los Angeles Groundwater Replenishment Project (GWR) proposed by LADWP:

- a) I am very pleased that LADWP proposes to utilize $\pm 30,000$ acre feet per year (AFY) of advanced purified recycled water for forthcoming recharge purposes into the San Fernando Basin (SFB), the largest of the 4 groundwater basins within the Court-adjudicated ULARA region.
- b) Such an annual recharge volume is vital to the continued sustainability of SFB.
- c) Such an annual recharge volume is also particularly invaluable to SFB because of:
 - Possible climate change and possible reduced annual rainfall in the future, and the resulting reduced amounts of natural recharge and surface water available for use in the existing artificial recharge spreading basins in the northeastern portion of the San Fernando Valley;
 - The loss in the past few years of surface water available from the Los Angeles Aqueduct which, for many years, had been used as an additional source of imported water for artificial recharge in those same spreading basins.
- d) I am confident that LADWP will be able to properly design and eventually construct its new advanced water purification treatment facility at its existing Tillman Plant in order to provide the quality of recycled water that would be acceptable to existing regulators for purposes of groundwater replenishment.



Memorandum

- e) I am pleased to read that your plans include not only use of the existing facilities at the Hansen and Pacoima spreading grounds, but also the simultaneous use of new injection wells to further enhance your recharge operations in the SFB.
- f) As we have discussed on numerous prior occasions, the Watermaster believes the additional use of injection wells will: allow more water to be recharged; permit the advanced purified recycled water to be recharged at different depths and into specific aquifer systems within the SFB; allow the recharge to occur throughout each year, including wet periods, when the spreading basins are being actively used to conserve & recharge rainfall/runoff (stormwater); and provide for increased sustainability of the local groundwater resources.
- g) Figure 5 herein has been adapted directly from the subject LADWP document dated September 2013 to illustrate the locations of: the existing Hansen and Pacoima spreading grounds; the alignment of the existing 54-inch diameter pipeline that could deliver the advanced purified recycled water from the Tillman Plant to those existing spreading grounds; and the location and alignment of the 13 currently-proposed injection wells.
- h) Upon reviewing Figure 5, I further note the following:
 - The proposed injection wells are currently aligned in a north-south direction in a portion of SFB where groundwater flows approximately in the same north to south direction. Such an alignment of injection wells relative to the local groundwater flow direction is not advantageous for groundwater recharge.
 - The injection wells are too close to the Pacoima spreading grounds. If injection were to occur in this area, coupled with recharge from these nearby Pacoima facilities, a sizeable groundwater mound would likely result.
 - There are too many injection wells for this area and the proposed wells would be too closely spaced; one paragraph in the report text (p. 1-15) suggests that "where two or three wells would be clustered together, the wells would be spaced a minimum of 15 to 20 feet apart to minimize drilling interferences..." Such a configuration could also cause mounding issues, and decrease the efficacy of injection.
 - There would likely be "interference" between the recharge taking place in the spreading grounds and in the nearby injection wells; local aquifer transmissivity may not be sufficient to allow continued downgradient flow of spreading basin recharge and recharge from the injection wells; again, mounding may occur in the current configuration.
 - There is no justification provided in the report text to document why drilling depths would be to "approximately 500 to 600 feet below ground surface".
 - The text does not discuss the need to site and construct a few groundwater monitoring wells to help monitor the movement of the injected advanced purified recycled water within the local groundwater basin.



Memorandum

- i) Instead, I once again recommend constructing most, if not all, of the injection wells in a north-south direction along certain streets like Sepulveda, Kester, Van Nuys, Hazeltine, etc which all lie west of and directly upgradient from the City's existing wellfields, and where the groundwater flow is generally west to east. Perhaps 2 or 3 of the currently-proposed injection wells, i.e., those at the southern end of the proposed alignment (see Figure 5 herein) could be useful in the general locations suggested at this time, to further augment groundwater recharge in that area. This recharge, plus constructing the other injection wells farther to the west as discussed above, would help to further diversify the locations for, and the depths and amounts of recharge to SFB.



RON CHAPMAN, MD, MPH
Director & State Health Officer

State of California—Health and Human Services Agency
California Department of Public Health



EDMUND G. BROWN JR.
Governor

November 21, 2013

Mr. Charles C. Holloway
Manager of Environmental Planning and Assessment
Los Angeles Department of Water & Power
Environmental Affairs
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Dear Mr. Holloway:

**SYSTEM NO. 1990006 – CEQA INITIAL STUDY, LOS ANGELES GROUNDWATER
REPLENISHMENT PROJECT**

We are in receipt of the CEQA Initial Study (IS) for Los Angeles Groundwater Replenishment Project dated September 2013. The IS was prepared by the Los Angeles Department of Water and Power (LADWP) as lead agency for the proposed project to assist in determination if implementation of the proposed project would result in significant adverse environmental impacts.

We have reviewed the IS and would like to offer the following comment:

- Under Section 1.8 of the IS titled "Required Permits and Approvals", the Department of Public Health - Drinking Water Program should be listed among the other state and local agencies responsible for approval of various aspects of the proposed project.

Should you have any questions regarding this letter, please contact Dmitriy Ginzburg, P.E. at (818) 551-2022 or me at (818) 551-2016.

Sincerely,

Chi Diep, P.E.
District Engineer
Metropolitan District

Mr. Charles C. Holloway

Page 2

November 21, 2013

cc: Mr. Michael Mercado
Environmental Project Manager
Los Angeles Department of Water & Power
Environmental Affairs
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Ms. Melissa Hatcher
Project Director
AECOM Technical Services, Inc.
515 South Flower Street, 9th Floor
Los Angeles, CA 90071