

**VOLUME II**

Appendix A	Notice of Preparation
Appendix B	Comment Letters on Initial Study/Mitigated Negative Declaration and Notice of Preparation
Appendix C	Notice of Intent to Adopt a Negative Declaration
Appendix D	Summary of Responses on IS/MND and NOP
Appendix E	Biological Survey Report
Appendix F	Geotechnical Assessment
Appendix G	Growth Inducement Data
Appendix H	Comment Letters on Draft Environmental Impact Report and Responses to Comments
Appendix I	Fire Hydrant Data

**APPENDIX A**  
**NOTICE OF PREPARATION**



RICHARD J. RIORDAN  
Mayor

Commission  
KENNETH T. LOMBARD, *President*  
JUDY M. MILLER, *Vice president*  
RICK J. CARUSO  
MICHAEL I. KESTON  
DOMINICK W. RUBALCAVA  
JOHN C. BURMAHLN, *Secretary*

S. DAVID FREEMAN, *General Manager*

November 17, 2000

To: Interested Parties and Individuals

**Notice of Preparation  
A Draft Environmental Impact Report For  
The Mulholland Water Pipeline**

Pursuant to the State of California Public Resources Code and the "Guidelines for Implementation of the California Environmental Quality Act (CEQA)," as amended, the City of Los Angeles Department of Water and Power, as the local lead agency, is preparing a Draft Environmental Impact Report for the project described below:

**Project Title:** Mulholland Water Pipeline

**Project Location:** The proposed project would be located in the Woodland Hills area of the City of Los Angeles. The project would be constructed along Mulholland Drive between Greenbriar Drive and Picasso Avenue.

**Project Description:** The proposed project would be a new water pipeline. The project is needed to improve overall water system reliability to existing system users and provide water service to an already approved development (including Tract 33454) in the southwestern San Fernando Valley area of the City of Los Angeles.

**Scoping Period:** A brief project overview has been enclosed for your information. The scoping period for the Notice of Preparation will extend from November 23, 2000 to December 26, 2000. Please submit your comments in writing to Mr. Charles Holloway, Supervisor of Environmental Assessment, at the following address no later than December 26, 2000.

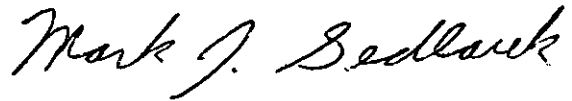
Mr. Charles Holloway  
Supervisor of Environmental Assessment  
111 N. Hope Street, Room 1044  
Los Angeles, CA 90012

Water and Power Conservation . . . a way of life

November 17, 2000

If you have any questions or are in need of additional information, please contact Mr. Holloway or Mr. Kelvin Lew at (213) 367-0285 or (213) 367-0202, respectively.

Sincerely,

A handwritten signature in black ink that reads "Mark J. Sedlacek". The signature is written in a cursive style with a large, prominent initial "M".

MARK J. SEDLACEK  
Manager  
Corporate Environmental Services

Enclosure

**APPENDIX B**

**COMMENT LETTERS ON INITIAL STUDY/MITIGATED NEGATIVE  
DECLARATION AND NOTICE OF PREPARATION**



# United States Department of the Interior

## NATIONAL PARK SERVICE

Santa Monica Mountains National Recreation Area  
401 West Hillcrest Drive  
Thousand Oaks, California 91360-4207

In reply refer to:  
L76 (SAMO)

August 14, 2000

Charles Holloway  
Los Angeles City Department of Water and Power  
111 N. Hope St., Room 1044  
Los Angeles, CA 90012

Dear Mr. Holloway:

The National Park Service recommends the Department of Water and Power (DWP) prepare an Environmental Impact Report (EIR) for the proposed Mulholland Water Pipeline Project. The Initial Study omits consideration of the historic cultural value of Mulholland Drive and incompletely evaluates the project's potential for growth inducement. Impacts to historic features and growth inducement are, in this case, applicable thresholds for requiring an EIR.

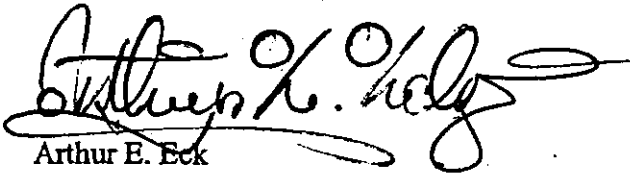
An EIR is necessary to evaluate "dirt" Mulholland's eligibility for both the California and National Registers of Historic Places. Congress specifically mandated National Park Service to protect the Mulholland Scenic Parkway Corridor as part of the Santa Monica Mountains National Recreation Area (Public Law 95-625, November 10, 1978). "Dirt" Mulholland, in particular, retains historic integrity because it provides the user with a clear impression of the original design and viewshed of the highway. Mulholland wished for people to take scenic drives on the road to enjoy unobstructed views of greater Los Angeles. The road was dirt at the time. Furthermore, if any federal money is involved in constructing the pipeline, it is a federal undertaking and requires review under Section 106 of the National Historic Preservation Act. The agency providing the funding would serve as lead agency for 106 consultation. As for review under CEQA, Mulholland Drive would be eligible for inclusion in the California Register of Historic Resources. Mulholland Drive is associated with events that have made a significant contribution to the broad patterns of California's history, and it is associated with the life of a person important to our past.

An EIR is needed to assess impacts of potential build-out of remaining private properties. There is substantial evidence that supplying water to new areas is growth inducing. One need only consider Los Angeles; development of the city is largely attributed to William Mulholland's water conveyance projects. The proposed pipeline would bring water infrastructure within reach of a number of private properties adjacent to Mulholland Drive in addition to providing service to the already-approved developments. Several remaining private parcels are slated for parkland acquisition because of high natural and cultural resource value, for parkland viewshed protection, and because they are adjacent to existing parkland.

The greatest concern regarding growth inducement is the increased potential that "dirt" Mulholland will be paved because of two reasons. First, the increased number of residents using the dirt road will increase demand for the convenience of paved access. Second, erosion around any maintenance holes in the road may precipitate the need to pave the road to protect the infrastructure. Any paving of the road, and particularly paving of the full "dirt" Mulholland, would lead to a complete change in the existing character of the area and would be highly destructive and incompatible with current park uses. State parkland would be bisected, and wildlife would be more subject to roadkill. Recreational walking, mountain biking, and equestrian use would no longer be safe and park-like in character. Finally, the historic integrity of "dirt" Mulholland would be irreversibly lost. The potential impacts of growth inducement and paving are extremely significant and need to be addressed in an EIR. We would also recommend the City provide assurance of not paving "dirt" Mulholland as part of the pipeline approval process.

A tremendous public investment has been made to purchase parkland around "dirt" Mulholland. We recommend the city protect the investment by fully exploring all potential pipeline installation impacts through EIR evaluation. Thank you for considering the National Park Service's input. If we can be of assistance, please call Melanie Beck, Outdoor Recreation Planner, at (805) 370-2346.

Sincerely,



Arthur E. Eck  
Superintendent

cc: Joe Edmiston, Executive Director, Santa Monica Mountains Conservancy  
Russ Guiney, Superintendent, Angeles District, State Department of Parks and Recreation  
Margo Murman, Executive Officer, Resource Conservation District of the Santa Monica Mountains

STATE CAPITOL  
P.O. BOX 942849  
SACRAMENTO, CA 94249-0041  
(916) 319-2041

DISTRICT OFFICE  
16130 VENTURA BLVD., SUITE 230  
ENCINO, CA 91436  
(818) 501-8991

# Assembly California Legislature

**SHEILA JAMES KUEHL**  
ASSEMBLYMEMBER, FORTY-FIRST DISTRICT  
*Chair, Committee on Judiciary*



**COMMITTEES:**

Appropriations  
Health  
Local Government  
Water, Parks and Wildlife  
Chair, Select Committee on  
Entertainment and the Arts  
Select Committee on  
Coastal Protection  
Select Committee on  
Construction Fraud  
Select Committee on  
Earthquake Safety and Preparedness  
Select Committee on the  
San Gabriel Valley  
Groundwater Contamination  
Joint Committee on the Arts  
California Coastal Conservancy  
Judicial Council

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August 1, 2000

Mr. Charles Holloway  
Department of Water and Power  
City of Los Angeles  
111 No. Hope Street, Room 1044  
Los Angeles, California 90012

**Re: Mulholland Water Pipeline Project**


Dear Mr. Holloway:

I have been contacted by a number of concerned constituents and based on their expressed concerns, I am requesting that you please conduct a full Environmental Impact Report (EIR) on the proposed installation of a pipeline on dirt Mulholland. I strongly feel that the Negative Declaration does not sufficiently address the numerous environmental concerns associated with the project.

The proximity of the publicly owned park resources—held by both state parks and the Santa Monica Mountains Conservancy—adjacent to the area in question, calls for a more vigorous study. Inappropriate development in this area could easily be encouraged by the placement of the pipeline, and I believe we have a responsibility to be extra careful in protecting the public investment in our dwindling natural habitat areas. It is better to take the time and care to broaden the investigation of the consequences of this proposal now than to mourn a hasty, ill-advised decision later.

I strongly support the more complete study in the form of an EIR before any further steps are taken to install and/or upgrade an existing pipeline in the Western part of dirt Mulholland Drive. Thank you for taking my views into consideration and I look forward to your reply and to being kept informed on this issue.

Sincerely,

  
SHEILA JAMES KUEHL  
Member of the Assembly  
41<sup>st</sup> District



**DEPARTMENT OF HEALTH SERVICES  
DRINKING WATER FIELD OPERATIONS BRANCH**

1449 West Temple Street, Room 202  
Los Angeles, CA 90026  
(213) 580-5723  
(213) 580-5711(FAX)



July 12, 2000

Charles Holloway  
Environmental Affairs Officer  
City of Los Angeles  
200 N. Main Street  
Room 709, City Hall East  
Los Angeles, CA 90012

Dear Mr. Holloway:

**Negative Declaration and Initial Study for the Mulholland Water Pipeline Project  
for Los Angeles Department of Water and Power (SCH # 2000061066)**

Thank you for the opportunity to provide comments on the above-mentioned project. We have reviewed the document and have comments regarding the pipeline installations. The pipelines must be constructed in accordance with our Department's waterworks standards that include:

**Products and Materials**

Pipeline installed in the distribution system should comply with the standards of the American Water Works Association.

**Water Main Separation**

- Water mains should be installed at least 10 feet horizontally from, and one foot vertically above, any parallel pipeline conveying sewage or recycled water.
- The pipeline must not be installed within 100 horizontal feet of any sanitary landfill, wastewater disposal pond, or hazardous waste disposal site, or within 25 feet of any cesspool, septic tank, and sewage leach field or seepage pit.
- Water mains crossing lines conveying sewage or reclaimed water should be constructed perpendicular to and at least one foot above the sewage or reclaimed water line. No connection joints should be made in the water line within nine horizontal feet of the wastewater or reclaimed water line. The minimum separation distance is measured from the nearest outside edge of each pipe.

### Flushing

A flushing valve or blow-off should be provided at the end of each newly installed dead-end water main. Flushing valves and blow-offs should not discharge to a sanitary sewer without an air gap separation between the sewer and the valve or blow-off. Flushing valves and blow-offs should be designed to maintain the minimum continuous flushing flows. For a nominal inside main with diameter of 10" or more, flushing flow should be 600 gallons per minute.

### Air Release Valves

Vent openings for air and vacuum relief and air release valves should be extended at least one foot above grade and above the maximum recorded high water level; and provided with a screened, downward facing, vent opening equipped with a mesh screen. The maximum size opening in the screen should not exceed 1/8 inch.

### Isolation Valves

As a minimum, isolation valves should be installed on all new water mains at the following locations within the distribution system:

- No further than 1,320 linear feet apart on all water mains having a diameter of 12 inches or less.
- At each tee or crossing connection between mains. An isolation valve should be installed on each cross main, that has a diameter of 12 inches or less, within 100 feet of the tee or crossing connection with the primary main.
- Between the water main and each fire hydrant served by the water main.

### Water Main Valve Construction

Valves constructed on new water mains should have the following:

- A valve box should be installed over each buried valve stem to aid in locating and operating the valve.
- Valves buried in trenches greater than five feet below the finished grade should have either a valve stem riser to permit the use of a normal key or a notation on valve records indicating that a long key will be required.
- Gate valves should be installed in the vertical position unless they are designed to operate in other positions.

Mr. Charles Holloway  
Page 3  
July 12, 2000

Water Main Pressure

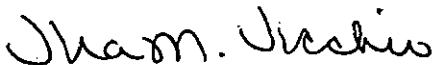
Water main should be designed to have at least 20 psig pressure throughout the length of the main.


Pipeline Disinfection

Newly installed water mains have to be disinfected and sampled in accordance with American Water Works Association Standard C-651-92.

Please call Ms. Sutida Bergquist at (213) 580-5726 if you have any questions regarding our environmental review of this project.

Sincerely,



 Gary H. Yamamoto, P.E., Chief  
Technical Programs Branch  
Division of Drinking Water and  
Environmental Management

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

SDWSRF-Environmental Coordinator  
601 North 7<sup>th</sup> Street, MS 92  
Sacramento, CA 94234-7320

Pankaj Parekh  
Regulatory Affairs Manager  
LADWP  
111 North Hope Street  
Los Angeles, CA 90012-2694



South Coast Region  
4949 Viewridge Avenue  
San Diego, California 92123  
(858) 467-4201  
FAX (858) 467-4239

July 20, 2000

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

Dear Mr. Holloway:

**Negative Declaration for Mulholland Water Pipeline  
SCH # 2000061066, Los Angeles County**

The Department of Fish and Game (Department), has reviewed the Proposed Negative Declaration and Initial Study (IS) for impacts to biological resources. The proposed project includes the construction of approximately 11,100 linear feet of new water pipeline and replacement of approximately 3,500 linear feet of existing water pipeline along paved and unpaved dirt road portions of Mulholland Drive within the Santa Monica Mountains. Portions of the project are located within residential areas and undeveloped State-owned parklands.

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Section 15386) and pursuant to our authority as a Responsible Agency under CEQA Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code Section 2050 et seq) and Fish and Game Code Section 1600 et seq.:

**Impacts to Biological Resources**

1. The IS indicates that the project involves excavation of open trenches to lay the water pipe and these trenches may remain exposed for a period of time.
  - a. The Department recommends that in addition to covering the trenches during the evening, as proposed in the IS, that a biological monitor inspect any open trenches immediately prior to their filling to remove trapped wildlife that may have fallen into the trenches. In addition, any areas proposed for ground disturbance (in appropriate habitat as determined by the biological monitor) should be inspected to locate and remove any reptiles or other wildlife that may become crushed or otherwise injured by project activities. Specifically there is a

Mr. Charles Holloway  
July 20, 2000  
Page Two

concern that the San Diego horned lizard (*Phrynosoma coronatum blainvillei*) and/or California Coast horned lizard (*Phrynosoma coronatum frontale*) collectively referred to as Cost Horned Lizard (CHL) may fall into and become trapped in the trenches or crushed by equipment since CHL and other reptiles will utilize habitats along dirt roads where loose soil, insects and basking conditions are available. The CHL relies upon its cryptic coloration for protection and often remains motionless when alarmed making it increasingly vulnerable to mortality from vehicles and other ground disturbances. Coast Horned Lizards are considered California Species of Special Concern and "rare" under CEQA (CEQA Guidelines 15380). Project impacts resulting in direct and indirect mortality of the CHL are also considered significant under CEQA unless appropriate avoidance and/or mitigation measures are initiated to reduce impacts below a significant level (CEQA Guidelines 15064 -15065).

- b. All salvaged wildlife should be placed into the nearest appropriate habitat out of harms way of construction equipment and open trenches.

#### **Impacts to Breeding Birds**

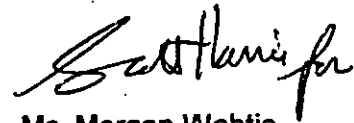
1. Proposed project activities such as equipment use near vegetation, disturbance of vegetation etc. has the potential to directly impact a number of native bird species if conducted during the breeding bird season.
  - a. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918(50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).
  - b. Proposed project activities (including disturbances to or near native and non-native vegetation) should take place outside of the breeding bird season (March 1- August 15,) unless a biological monitor confirms that there are no active bird nests or vulnerable fledglings within the project or vicinity which would be disturbed by the proposed project.

The Department recommends that the above concerns are addressed before Lead Agency Approval of any CEQA document for this propose project.

Mr. Charles Holloway  
July 20, 2000  
Page Three

Thank you for this opportunity to provide comment. Questions regarding this letter and further coordination on these issues should be directed to Mr. Scott Harris, Associate Wildlife Biologist at (818) 360-8140.

Sincerely,



Ms. Morgan Wehtje  
Environmental Scientist IV

cc: Mr. Scott Harris  
Ms. Morgan Wehtje  
Department of Fish and Game

State Clearinghouse  
Sacramento, California



State of California • The Resources Agency

DEPARTMENT OF PARKS AND RECREATION

Angeles District  
1925 Las Virgenes Road  
Calabasas, CA 91302

Gray Davis, Govern

Rusty Arelas, Direct

July 14, 2000

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

Re: Mulholland Water Pipeline Project, SCH # 2000061066

Dear Mr. Holloway:

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

## II. Population and Housing

We do not agree that the project will not induce growth directly or indirectly. The extension of the water line where none exists today in proximity to properties currently without service overcomes an obstacle to the development of these properties.

## III. Geologic Problems

We do not agree that there is a less than significant impact from fault rupture or seismic ground shaking. During the 1994 Northridge earthquake, a broken valve at the Corbin Tank sent water downslope into Topanga State Park, creating significant erosion before the breakage was detected.

We are concerned with the potential for project-induced erosion. The dirt portion of Mulholland Highway suffers from severe erosion problems to previous infrastructure projects.

## XIII. Aesthetics

We do not agree that the project will have a less than significant aesthetic effect. The presence of water hydrants on an undeveloped segment of dirt Mulholland where none now exist will introduce an urban element into essentially wilderness environment. This is a potentially significant impact.

Mr. Holloway  
July 14, 2000  
Page 2

Finally, the negative declaration states that the project will require an easement from the Santa Monica Mountains Conservancy. The granting of an easement itself is a discretionary act that requires environmental review under the California Environmental Quality Act. We are concerned that the public and agencies have not had the opportunity to comment on the proposed language of the easement and the rights that will be granted therein for the Department of Water and Power to access and perform future maintenance work on public parkland. We request that the approval of this negative declaration be delayed until the easement has been granted.

Sincerely,

For:  
Russell G. Guiney  
District Superintendent



Russ Dingman  
District Planner

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



**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207



July 12, 2000

Mr. Charles Holloway  
Mulholland Water Pipeline  
City of Los Angeles Dept. of Water and Power  
111 N. Hope Street, Room 1044  
Los Angeles, California 90012

**Request for Extension on Comment Period**  
**SCH# 2000061066**

Dear Mr. Holloway:

On June 20, 2000, the Santa Monica Mountains Conservancy received the Draft Negative Declaration and Initial Study for the Mulholland Water Pipeline Project, SCH# 2000061066. The Conservancy did not receive this document in time to agendize the adoption of a comment letter at the June meeting. As such, the Governing Board will be considering a resolution adopting a comment letter on the project at its July 26, 2000 meeting.

The Conservancy owns property in the immediate vicinity of the proposed project, and based on a preliminary review of the Negative Declaration by our staff ecologist, Conservancy land may be affected by the project. In light of this, we are respectfully requesting an extension on the comment period so that our Governing Board may officially adopt a comment letter at its next meeting. We will forward the adopted comment letter to your agency as quickly as possible thereafter.

Please feel free to contact me should you have any questions or concerns. I can be reached at (310) 589-3200 ext. 112. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Rorie Skei".

RORIE SKEI  
Deputy Director

cc: Hon. Cindy Miscikowski  
David Freeman, Dept. Water & Power  
Elizabeth Cheadle, Chairperson, SMMC

**SANTA MONICA MOUNTAINS CONSERVANCY**

SOOKY GOLDMAN NATURE CENTER  
2600 FRANKLIN CANYON DRIVE  
BEVERLY HILLS, CALIFORNIA 90210  
PHONE (310) 858-7272  
FAX (310) 858-7212



July 26, 2000

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

**Mulholland Water Pipeline Project  
Draft Negative Declaration Comments  
SCH No. 2000061066**

Dear Mr. Holloway:

The Santa Monica Mountains Conservancy (Conservancy) appreciates the Department of Water and Power's willingness to extend the comment period on the Draft Negative Declaration to install a new pipeline and upgrade an existing pipeline in the western portion of dirt Mulholland Drive. The Conservancy manages the approximately 1,100-acre Mulholland Gateway Park which abuts every foot of the proposed pipeline improvements between the Corbin Tank and Cachalote Street. The accumulated parkland along dirt Mulholland Drive represents a significant public investment and public resource of statewide significance that must not be despoiled by unnecessary public works projects. The Conservancy opposes the project and provides the following comments on the environmental document.

The Negative Declaration provides just a skeletal rationale of the need for the project and absolutely no discussion of alternative projects to provide similar water system improvements. The Department's 1997 Mulholland Pipeline Report examined a range of alternatives. The subject Negative Declaration is deficient for not integrating the contents of that report into the current environmental analysis.

For example, this 1997 report addresses the need for a new higher elevation replacement Topanga Tank. The Negative Declaration does not reference any such need. In general the proposed project provides a stand-alone set of improvements that do not allude to any remaining deficiencies or needs for future supplemental projects. In analyzing the proposed project, the public has no guarantees that future related projects will not be proposed by the Department. The Negative Declaration is deficient for not adequately describing whether or not the proposed project has any reasonable potential to just be a first step in a larger project. If any other related projects are contemplated by the Department they must be disclosed in the current California Environmental Quality Act document.

Mr. Charles Holloway  
Department of Water and Power  
Mulholland Water Pipeline Project  
July 26, 2000  
Page 2

By drawing inferences from the 1997 Mulholland Pipeline Report and the Woodland Hills Estates (21000 Mulholland) EIRs, it is safe to say that the proposed project will cost approximately \$2.5 million. The project description is deficient for not addressing other, less environmentally damaging, means to achieve the desired objectives within this budget range. The Negative Declaration is also deficient in not stating how the project would be funded. What are the direct required contributions of benefitting landowners, if any? Insufficient information has been provided to the decision-makers. A more complete environmental document must be recirculated.

The recirculated environmental document must consider alternative projects. One such alternative may be to acquire the 21000 Mulholland project site and locate a tank at the upper (southern) end of the existing disturbed bowl. The base of such an above ground tank would be at an approximate elevation of 1,260 feet. Elimination of this approved development eliminates much of the direct need for the proposed extension from the Corbin Tank, and it would put a tank much closer to the "Corbin Tank Supplemental to Kittridge Tank Service Area" as shown in Figure 5 (Emergency Service Area) of the Negative Declaration.

The Negative Declaration is also deficient in stating that many of the larger water system issues relevant to the proposed project were addressed in the Department's 1981 FEIR and 1985 Supplemental EIR for the Corbin Water Tank and Corbin Tank Relocation projects, respectively. It is our understanding that these documents only analyzed direct pipeline impacts 1500-feet west of the Corbin Tank to Greenbriar Drive.

Most importantly, the Initial Study is deficient in concluding that the project would not induce substantial growth in an area either directly or indirectly (II.b Population and Housing ) and that the project does not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals (XVI.b Mandatory Findings of Significance). It is critical for any such pipeline extension environmental document to disclose how the subject project directly benefits the Woodland Hills Estates (21000 Mulholland) and Mulholland Hills Associates (Avatar) VTT No. 50784 projects. How are these projects dependent on the proposed project?

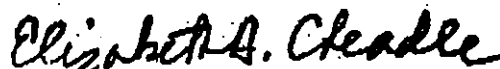
In light of all the serious deficiencies expressed in this letter, this agency concludes that the preparation of a focused EIR is critical to address the project's growth-inducement potential.

Mr. Charles Holloway  
Department of Water and Power  
Mulholland Water Pipeline Project  
July 26, 2000  
Page 3

The Conservancy opposes both the construction of any unnecessary infrastructure within, and through, Mulholland Gateway Park and any projects that would induce growth that is detrimental to existing public resources. The Negative Declaration states that permission from the Conservancy may be needed for construction purposes on Conservancy property. Because of the project's potential significant adverse effects that are outlined in this letter, this body hereby officially notifies the Department that no permission shall be granted.

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

Sincerely



ELIZABETH A. CHEADLE  
Chairperson

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

June 27, 2000

IGR/CEQA cs/000637  
NEG DEC  
City of Los Angeles  
Mulholland Dr.  
Water Pipeline Project  
Vic. LA-27-11.06  
SCH # 2000061066



**RECEIVED**  
JUL 10 2000  
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Mr. Charles Holloway  
Los Angeles Department of Water and Power  
111 N. Hope Street, Rm. 1044  
Los Angeles, CA 90012

Dear Mr. Holloway:

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

We recommend that construction related truck trips on State highways (SR-27, Topanga Canyon Blvd. and US-101 Ventura Freeway) be limited to off-peak commute periods.

If you have any questions regarding our response, refer to Caltrans IGR/CEQA Record # cs/000637, and please do not hesitate to contact me at (213) 897-4429.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Buswell".

STEPHEN BUSWELL  
IGR/CEQA Program Manager

cc: Mr. Scott Morgan, State Clearinghouse



# CINDY MISCIKOWSKI

City of Los Angeles  
Councilwoman, Eleventh District

**Committees**  
Chair, Public Safety

Vice-Chair, Planning and Land  
Use Management

Member, Budget and Finance

July 28, 2000

Mr. David Freeman  
Mr. Charles Holloway  
Department of Water and Power  
111 N. Hope Street  
Los Angeles, CA 90012  
Mail Stop 800

**RECEIVED**  
AUG - 8 2000  
CES

Dear Messrs. Freeman & Holloway:

Since the release of the Negative Declaration for the Mulholland Pipeline project I have received several calls and letters regarding the Department's analysis on this project. Based on my review of legitimate comments received from neighbors and prominent Mulholland organizations I would like to share with you my concerns.

Under the California Environmental Quality Act (CEQA) any project that is surrounded by such controversy mandates further environmental research and review. The Negative Declaration provided does not adequately review this project or provide measures for possible mitigation and additionally no alternative projects that provide similar water system capability are prepared. The Department's 1997 Mulholland Pipeline report examines a range of alternatives, however, the Negative Declaration does not include the contents of the report in its analysis.

The Negative Declaration also fails to adequately address any potential growth-inducing impacts. For these reasons I believe a higher level of environmental review is mandated and a focused EIR is necessary. The recirculated document should consider alternative projects and adequately address other legitimate issues raised by comments already received on the Negative Declaration

The preparation of a focused EIR is critical to address these issues. Thank you for your consideration.

Very truly yours, -

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

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

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



Committees  
Chair, Public Safety  
Vice-Chair, Planning and Land  
Use Management  
Member, Budget and Finance



# CINDY MISCIKOWSKI

City of Los Angeles  
Councilwoman, Eleventh District

July 14, 2000

Mr. S. David Freeman  
Department of Water and Power  
111 N. Hope Street  
Los Angeles, CA 90012  
Mail Stop 800

Dear Mr. Freeman:

Re: Proposed Dirt Mulholland Water Pipeline

I have received several communications from constituents in my district and other interested parties asking me to request the Department of Water and Power to extend the public comment period deadline of July 14, 2000 on the proposed negative declaration by your department for the Dirt Mulholland Water Pipeline Project.

Although your department has gone beyond the minimum public noticing requirements there are residents and homeowners in the area that only recently became aware of the Pipeline Project. Therefore, I believe that it would be appropriate to extend the public comment period on the proposed negative declaration for two additional weeks, thereby making Friday, July 28, 2000 the final day for submittal of public comments.

I am also requesting that the date for the Board of Power and Waters' public hearing on this matter be rescheduled from August 15, 2000 to September 19, 2000. As you know the Democratic National Convention is in town in early August, making it inconvenient for individuals to attend a August 15, 2000 hearing. Knowing that your next meeting would be September 5, directly following the labor day weekend, is also a problematic time, thus I suggested September 19 for the Boards' public hearing.

Thank you for your consideration of these issues.

Sincerely,

CC: Charles Halloway  
Kelvin Lew

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

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

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



July 13, 2000

RECEIVED  
JUL 17 2000  
CES

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



P.O. Box 784 Woodland Hills, CA 91365-0784 (818) 773-3555

Dear Mr. Holloway,

The Concerned Off Road Bicyclists Association, (CORBA) is a 501(c)3, non-profit organization that represents the interests of mountain bicyclists in the Santa Monica Mountains and Rim of the Valley Corridor. CORBA values our remaining wildlands for the natural resources they contain and as a place for responsible mountain bike recreation. We have examined the Negative Declaration on the proposed water pipeline on Dirt Mulholland. We oppose the pipeline and we find your Negative Declaration to be flawed.

Much of the land adjacent to Dirt Mulholland is public parkland. There are several private parcels which do not have immediate access to water and that along with other features inhibits their real estate development. The proposed pipeline provides easy access to water hookups and therefore abets development. Even if housing itself is not built, the easy water hookup raises the value of the property. Public park agencies must pay fair market value, and this project enhances the value of private property and it does so at public expense. It disadvantages public, common good property value and contributes to real estate speculation.

The Negative Declaration does not mention the impacts of the pipeline on plant and animal life. This is a serious omission.

Perhaps, more importantly some of the specific findings of "no impact" are wrong. There would be impacts and these impacts would be significant. The pipeline is not compatible with existing land use (item 1c). Existing use is open space preservation, resource protection and backcountry recreation. The pipeline interferes with all three.

The pipeline would create a "disadvantage of long term environmental goals" (item XVI.B.) since it abets development where now development is difficult and expensive. Several park agencies have expressed an interest in maintaining this land as Santa Monica Mountains National Recreation Areas open space. The cumulative impact of the pipeline are considerable (item XVI, C) for the same reason.

The pipeline project is unnecessary and destructive. It has the potential of seriously disrupting native animals and plants and interfering with public enjoyment of nearby parkland. It contributes to real estate speculation and development at public expense. The project should be withdrawn. The Negative Declaration that you're using to clear the project is flawed. We urge you to do a complete Environmental Impact Report, (EIR). The significance of the project and it's impacts seem to warrant it.

Please keep me informed of all information related to this project.

Sincerely,

Peter Heumann,  
on behalf of CORBA



*Fair Hills Farms*2735 Santa Maria Road Topanga, California 90290  
(818) 347-5049VIA FACSIMILE & U.S. MAIL  
Facsimile No.: (213) 367-3287  
July 14, 2000City of Los Angeles  
Department of Water and Power  
Corporate Environ  
Attn: Charles Holloway and Kevin Lew  
Box 51111  
Los Angeles, CA 90051-0100RE: MULHOLLAND WATER PIPELINE PROJECT AND ITS EFFECTS ON FAIR HILLS  
FARMS, 2735 SANTA MARIA ROAD

Dear Sirs:

After reading the letter and supplemental information I received regarding the Mulholland Pipeline Project, I felt compelled to bring a major concern to your attention.

I am one of the owners of Fair Hills Farms located at 2735 Santa Maria Road. Fair Hills is a horse-boarding farm for approximately 120 head of horses and we rely entirely on Mulholland Drive for ingress and egress of our horse trailer as well as for supplies that are delivered by semi-truck. If you close Mulholland Drive, we will have no alternate route for our oversized vehicles. The horse truck and trailer combined are approximately 47 feet 6 inches in length and 8 feet wide.

I hope we will be able to arrange a solution to our transportation woes.

Very truly yours,

FAIR HILLS FARMS

Graydon H. Brittan

GHB/cj



# THE FEDERATION

OF HILLSIDE AND CANYON ASSOCIATIONS, INC.

2337 ROSCOMARE ROAD, PMB 2-228  
LOS ANGELES, CALIFORNIA 90077

FOUNDED IN 1952

July 14, 2000

## EXECUTIVE COMMITTEE OF THE FEDERATION

**PRESIDENT**  
Steve Twining  
**CHAIRMAN**  
Patricia Bell Hearst  
**VICE-PRESIDENTS**  
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Clare Marter-Kenyon  
**ASSISTANT SECRETARY**  
Fran Reichenbach  
**TREASURER**  
Robert Levy

FAX

Mr. Charles Holloway, Corporate Environmental Service

Ms. Julie Spacht, Water District Engineer

Re: Mulholland (dirt) Water  
Pipeline Project (Initial  
Study and Negative Declaration.

## MEMBER ASSOCIATIONS

Beechwood  
Bel-Air Knolls  
Bel-Air Skycrest  
Benedict Canyon  
Beverly Glen Park  
Briar Summit  
Briardiff  
Cahuenga Pass  
Cander  
Curson Canyon  
Echo Park  
Elysian Heights  
Encino  
Forest Hills  
Franklin Hills  
Franklin/Hwd. Blvd. West  
Friends of Caballero  
Glenridge  
Highland Owners  
Hollywood Crescent  
Hollywood Dell  
Hollywood Heights  
Hollywoodland  
Homeowners of Encino  
Los Feliz Improvement  
Mt. Olympus  
Mount Washington  
Nicholas Canyon  
No. Beverly Drive / Franklin Cyn.  
Outpost  
Pacific Palisades  
Residents of Beverly Glen  
Roscomare Valley  
Sherman Oaks  
Studio City  
Tarzana  
Top of the Canyon  
Torreyson-Flynn  
Whitely Heights  
Wonderland Park  
Woodland Hills

Dear Mr. Holloway and Ms. Spacht:

The Federation of Hillside and Canyon Associations, representing approximately 200,000 property owners and 40 homeowner associations in the Santa Monica Mountain and Canyons, is **OPPOSED** to any water pipeline down 'dirt Mulholland from the Corbin Tank to Canoga Avenue and would only support an alternate route providing documented need for this project.

Records indicate that this proposal was withdrawn in May of 1998 as "currently unneeded and a very low priority" by your department. This proposed pipeline appears to be a transparent effort to eliminate the environmental issues, native habitat corridors and to supply water for future development with a negative declaration. We are strongly requesting a full Environmental Impact Report be produced to expose all the environmental issues and to show that there there are no residential developments south of Mulholland, east of Canoga, requiring this project, and that this proposal will only add unnecessary infrastructure to subsidize development - at taxpayers expense!

The Federation is further requesting, under the California Public Records Act, the following:

Detailed maps showing proposed pipeline and alignment with 'dirt Mulholland  
All drilling reports  
All letters of complaints  
Copies of all memos, correspondence and reports  
Detailed budget for this proposed water pipeline.

We will be most happy to pay for the duplicating costs



Mr. Charles Holloway  
Ms. Julie Spacht

July 14, 2000

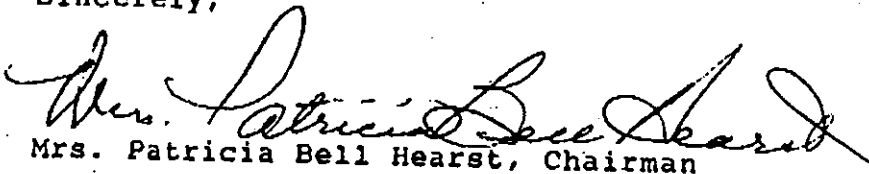
for the above requested information. Please contact me at  
310-472-0562 - fax - 310- 472-0953 and a check will be forthcoming.

Please advise me of any and all meetings (public) pertaining to  
this proposal and your department's negative declaration.

Again, the Federation of Hillside and Canyon Associations request  
that this sensitive area, 'dirt Mulholland' will have the benefit  
of a full Environmental Impact Report to protect the immediate  
surrounds of National and State Parkland for future generations.

Thanking you in advance for your immediate attention to our request.

Sincerely,



Mrs. Patricia Bell Hearst, Chairman

cc - David Freeman, General Manager, Department of Water & Power  
Councilwoman Cindy Miscikowski  
City Attorney, James K. Hahn  
Robert Hertzberg, Speaker, California State Assembly  
Barry Read, Mulholland Tomorrow  
California Department of Parks and Recreation  
Russ Guiney, District Superintendent  
Santa Monica Mountain National Recreation Area  
Art Eck, Superintendent

P.S...May we please also have:

All letters and comments of Support for this project.  
Thank you.

# **FRIENDS of CABALLERO CANYON**

**home address (for fastest response):**

**19261 Wells Drive  
Tarzana, California 91356**

**other mailing address:**

**19528 Ventura Boulevard, #217  
Tarzana, California 9356**

June 12, 2000

Mr. Charles Holloway  
City of Los Angeles  
Dept. of Water and Power  
111 N. Hope Street, Room 1044  
Los Angeles, CA 90012  
Fax (213) 367-3582

**Re: Mulholland Water Pipeline Project (Initial Study & Neg. Dec.)**

Dear Mr. Holloway:

**We reject the Initial Study and Negative Declaration in its entirety on the basis that the environmental effects have been neither adequately nor realistically presented. We request that a full EIR be prepared on the project. Our comments on this document follow.**

**ENVIRONMENTAL IMPACTS:** (You cannot so drastically disturb soils in this Scenic Corridor without serious environmental impacts.)

## **I. LAND USE AND PLANNING.**

Items a), b) and c) have potentially significant impacts, particularly c) incompatibility with existing land use in the vicinity: state-owned land including Topanga State Park is at risk. **Why wasn't the California Department of Parks and Recreation contacted?** They are the largest publicly-owned landowners in the vicinity.

## **II. POPULATION AND HOUSING**

Items a) and b) have not addressed the "waiting in the wings" aspect of developers' plans for their properties contiguous to Dirt Mulholland, especially 21000 Mulholland, the opening wedge, growth inducing.

### III. GEOLOGIC PROBLEMS

a), b), e), h), and i) and should be checked as Potentially Significant Impacts.

a) Why is there no mention of the Corbin Tank valve breakage or rupture during the Northridge earthquake....which was discovered (and reported to an unaware DWP) by parkland users and was not resolved for several weeks while drinking water gushed onto state parkland?

b) What assurance does the public have that a new pipeline will be stable during an earthquake when the Granada Trunk Line was severed during the Northridge Quake? Has the "state of the art" advanced so much?

e), f) h) i): Landslides are particularly common along Dirt Mulholland. One need only look at the existing "dry creep"; the borrowing of soils by someone; drive up after a heavy rain. One experiences fissures and cracks in the soil overlaying the bedrock even now. The very uniqueness of dirt Mulholland promulgated its status and recognition in the Santa Monica Mountains National Recreation Area legislation and Mulholland Plan, City of Los Angeles' identification: "The primary purpose of the plan is to assure maximum preservation and enhancement of the parkway's scenic features and resources." (direct quotes from your own IS/Neg. Dec., pp. 4, 5)

### IV. WATER

a), c), c) f) should be checked "potentially significant impact".

a) The "existing roadway" should state "dirt road", which it is. One can check out the erosion both north and south of Dirt Mulholland east of Reseda Ridge (Marvin Braude) Park to understand the need for the French drains or whatever one calls the very long tin run off funnels built to keep dirt Mulholland from severing straight across the road several years ago.

c), e) 12-16 months in winter exacerbates the historic and expected erosion. We understand that the project may now start in 2001. That may help during construction; however, the reason for the reburial of the oil lines on dirt Mulholland was the erosion and vehicular use over those oil lines which exposed them to possible threats of leakage, serious conflagration, etc. Dirt Mulholland is simply a road built on a ridge of mostly bedrock; any soils thereon will erode.

f) 2.5 to eight feet in depth is not shallow when approached by an animal or human.

### V. AIR QUALITY

a) and b) should be checked "Potentially Significant Impact".

a) The fact that the "Construction activities could exceed State air emission thresholds" speaks for itself.

b) How will individuals know which part of the project to avoid? It is a moving

project by DWP's own statement in the IS/Neg. Dec.

## **VI. TRANSPORTATION/CIRCULATION**

**a), c) and f) should be checked "Potentially Significant Impact".**

a) and c): Vehicles utilizing alternative access roads to and from the project site is considerably significant. Why were not residents of Santa Maria Road given notice of this project? We have found that they were totally unaware of the impending 12 to 16 month project, and were genuinely concerned.

f) Dirt Mulholland is a popular daytime AND nighttime route for bicyclists. This poses a threat to them, especially at night if the moveable construction project is not known to them; if it is not illuminated in some manner. Threat of injuries and consequent litigation is inherent.

## **VII. BIOLOGICAL RESOURCES**

**a), b), c) and e) should be checked "Potentially Significant Impact"**

a), b), and c) do not indicate any **professionally qualified or recognized biologist** has done any analysis or survey of the areas in question....it appears these statements were prepared from a desk. The work of Community Development By Design (U.C., Berkeley group) hired by the Santa Monica Mts. Conservancy discovered and asserted that Dirt Mulholland was/is a Wildlife Corridor utilized by deer, bobcat, resident mountain lion(s), etc., from the animal prints they monitored there. In turn Paul Edelman, the Conservancy's biologist, has publicly iterated this fact.

## **IX. HAZARDS**

**a) and e) should be checked "Potentially Significant Impact".**

If in fact DWP now plans to start the 12 to 16 month project to 2001, some portion of that construction will leave unguarded equipment subject to vandalism, especially at night, during the high fire season. That is a significant impact.

## **XII. UTILITIES AND SERVICE SYSTEMS**

**g) should be checked "Potentially Significant Impact"**

This was one of the purported intents of and rationale for the original 4 million gallon Corbin Tank!

## **XIII. AESTHETICS**

**a) and b) should be checked "Potentially Significant Impact"**

Hydrants and regulators are not scenic in a protected natural area, part of the Santa Monica Mountains National Recreation Area.

## **XIV. CULTURAL RESOURCES**

**a) and b) should be checked "Potentially Significant Impact".**

While it is true there is a history of considerable use of this "dirt road", the possibility always exists (especially when the excavation depth is estimated at 2.5 to 8 feet) that there would be paleontological and/or archeological findings. The specific

route should be mapped for a State recommended archeologist or paleontologist to be present or available on short notice, and probably to check out the areas prior to excavation, especially since your document alleges that the route may well be on the side banks of Dirt Mulholland.

#### **XV. RECREATION**

**b) should be checked "Potentially Significant Impact".**

The whole paragraph of this document states a significant impact on a recreational trail that links so many natural areas. We do not agree with even the 12-16 month "temporary inconvenience" as insubstantial or insignificant. Could you keep golfers off a public golf course that long?

#### **XVI.. MANDATORY FINDINGS OF SIGNIFICANCE**

**a), b), c) and d) should be checked as "Potentially Significant Impact".**

a) "...threaten to eliminate a plant or animal community.." etc., clearly illustrates the need for a full EIR. Since the true route is not known and is still just a line on a piece of paper, the decision-makers (public and appointed) cannot judge with accuracy.

d) recreational users will be compromised by a 2.5 to 8 foot trench for 12 to 16 months. The depth of the trench and length of time are significant in their leisure experiences.

### **OUR SUMMARY**

Since neither hard costs nor budget are contained in the IS/Neg. Dec. it is difficult for decision-makers (appointed members of the commission and the public to review this document.

What are the demands/criteria for the present needs of water users (present residents).

Fire hydrants -- as mentioned on p.2 ) should not be part of any project on dirt Mulholland, part of the Santa Monica Mountains National Recreation Area.

#### **Construction Methodology and Schedule**

##### **Regulating station and valves along Mulholland:**

Your maps/diagrams do not indicate the location of either, again, offering little to decision makers and the public for whom the documents are supposedly prepared. Further, to state "...valves may be located in the embankment to the roadway really means that there is a strong possibility they will be placed there.

**Soil surrounding these maintenance holes would be landscaped with native vegetation to stabilize the ground surface."**

DWP's record of use native vegetation is abysmal at best. (The Sierra Club had to intervene on the Corbin Tank "landscaping with natives" to point out to that DWP had not utilized natives, long after the landscaping was done. The public trusted, DWP lied).

**Construction activities for new pipeline installation are anticipated to commence in the end of 2000.**

Winter storms commence about that time. The "schedule" may well extend beyond the projected time line....vehicles routinely get stuck in the mud up there.

**Under normal operations, the proposed project would improve the water pressure within the distribution system to customers during periods of high water usage, and defer the need for additional water storage facilities and the replacement of pipelines within currently developed areas.**

Was not the Corbin Tank supposed to have fulfilled many if not all of these goals?

One would hope that projects such as this would take place within "currently developed areas" (as your document states) and not pristine, parkland roads.

It appears that this project is really to benefit development contiguous to dirt Mulholland.

Thank you for the opportunity to express our concerns for a full EIR.

Sincerely,



Jill Swift, President  
Board of Directors

Friends of Caballero Canyon



# Friends of the Santa Monica Mountains' Park & Seashore

Environmental Advocate Planning of Parks, Beaches  
and Open Space for all Southern California



1675 Sargent Place  
Los Angeles, California 90026  
213 250-3233  
FAX 213 250 5840

Friday, July 14, 2000

To: City of Los Angeles  
Department of Water and Power

Subject: Negative Declaration: Mulholland Water Pipeline

To Whom It May Concern:

Proposing a three mile 20/16 -inch-water pipeline line extension in dirt Mulholland without a full EIR/EIS is not acceptable. Rural park road Mulholland is a key feature of the Santa Monica Mountains National Recreation Area, Topanga State Park and the City of Los Angeles. There has been some confusion as to its future use with some proposing highways and parkways long this fragile ridge. However the issue as to who will pay for infrastructure and developer access without public benefit becomes a major question that the Negative Declaration does not adequately address. The document does not produce a rationale that the City can claim reduces the impact of this Mulholland growth inducing water line to insignificance.

The reasons that have been outlined in the Negative Declaration attempt to mask the real intent of the project that is to deliver water to the speculator Gary Morris for land that has limited access and no water at 11000 Mulholland. He also owns land called Eastport east of Mandeville Canyon. Councilwoman Cindy Miscikowski District 11 favors this project as she has long favored the development of Mulholland, while her constituency opposes any paving and high use along this spectacular stretch of Mulholland. Eighty percent of the people in the city want dirt Mulholland to remain a wild and scenic area, to be managed appropriately by a real park agency, without fire hydrants and water lines. The city owned right of way needs to be deeded to the State Park Department or the National Park Service and all properties along the right of way purchased and placed in the public domain. It is key watershed to the Los Angeles River meaning that any build out increases flood run off into the highwalled flood control channels that are incapable of handling the one hundred year flood.

The one million gallons Corbin Tank, sited over great public protest, has a history of being as vulnerable to earthquake as is the Granada Trunk line. It is not therefore a dependable supplemental source of water in case of fire or earthquake. It is especially laughable to propose fire hydrants for a development that has not been built when a super scooper filled with ocean water can take care of wild fires that always burn south into the Palisades, Brentwood and Topanga. Main fire protection are swimming pools with a good pump and clearing and people staying with their houses.

FROM :

FAX NO. :

Jun. 18 1998 02:34PM P2

Thank you for the opportunity to comment. I would like to see an alternative written as part of an EIR/EIS that calls for NO PROJECT.

Susan B. Nelson  
1675 Sargent Place  
Los Angeles, California 90026

213 250 3233  
213 250 5840 FAX

Suebnelson @AOL.com

cc: NPS Santa Monica Mountains NRA Superintendent Arthur Eck

# Mulholland Tomorrow

---

*President*  
Robert M. Hertzberg

*Board of Directors*  
Irving Azoff  
Warren Beatty  
Robert S. Colbert  
Don Henley  
Robert M. Hertzberg  
Gale Anne Hurd  
Paul Migdal  
Jack Nicholson  
Lisa Specht

July 14, 2000

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

Re: Mulholland Water Pipeline Project  
Initial Study and Negative Declaration

Dear Mr. Holloway:

We have reviewed the above-referenced project and the documents prepared by the Department of Water and Power. We find that the information contained in these documents is insufficient and the conclusions reached are unfounded. We urge the Department to prepare a full Environmental Impact Report on this proposal, including a complete consideration of alternatives to the proposed pipeline route. We further request that the time period for public comment on these documents be extended 30 days to allow the public and the Department time for full and careful consideration of the potential impacts of this project.

Our specific comments on the documents are as follows:

## **General Comments**

1. The level of analysis in the proposed negative declaration and initial study is inadequate. The goals of the project — improving overall water system reliability and providing water service to “already approved development” — are vague, unsubstantiated, and unquantified. Many of the “findings” stated in these documents are unsupported assertions, with no reference or citations to underlying studies or analyses that would support the Department’s contentions. Based on this document, inadequate information has been presented to allow either the Department or the public to determine whether a substantial potential for significant environmental impact is posed by this project.

## PROJECT DESCRIPTION

### PURPOSE

1. Complaints — The Department justifies this water line in part by stating they have received 31 complaints about pressure in 10 year period. They do not explain what the nature of these complaints has been, whether this is an unusual number of complaints, or whether or how these complaints will be addressed by this project. The Department's documents do not answer the following questions:
  - a. What type of complaints were made? Were they all from residential water users? Did they complain of persistent pressure problems, or episodic instances? Are the complaints only related to pressure and not supply? If so, why isn't the projected directed specifically toward measures to improve pressure?
  - b. When were these complaints received? Were they received recently or throughout the ten year period? Did a significant number of them follow the Northridge earthquake? Ha the number of complaints been consist throughout the decade?
  - c. From what areas of the Southwestern San Fernando Valley did these complaints originate? The Girard Tract? From within the service area of this project?
  - d. How would this project address those complaints? Will these properties be tied into the proposed water line?
  - e. How does this complaint rate compare to other areas? For similar numbers of customers, or geographically similar areas elsewhere in the City, is this a substantially larger number of complaints?
  - f. Is the Department proposing to spend \$3 million to address 31 complaints over a 10-year period?
  - g. How does the conveyance of water from the Department's system to the County system affect the pressure and reliability of water in the service area of the proposed water pipeline? Are these conveyances being addressed in this project?
  
2. System Reliability — The Project Description says one purpose of the water pipeline is "to improve over all water system reliability to existing system users." It does not describe, however, in what way the system is currently "unreliable."
  - a. A stated primary purpose of the project is to provide an alternative source of water service to the West Valley. Presumably, the West Valley has an adequate source of water to meet service demand under normal conditions, and the Corbin Tank alternative would only be required under emergency conditions (e.g., fire, earthquake). Under normal circumstances — that is, the vast majority of time that the pipeline is in operation — the Mulholland water pipeline would either be (a) empty, except for the water it will provide to the proposed subdivision at 21000

Mulholland Drive, or (b) full, carrying water that is not currently needed to meet demand in the West Valley. The conclusion then is that (a) the water pipeline is being constructed largely at the ratepayer's expense primarily to service 21000 Mulholland Drive, or (b) the water pipeline is being constructed to increase the supply of water to the West Valley, thereby fostering increased water usage and inducing growth. These impacts are not identified or addressed in the Initial Report.

- b. The Department states that it took three days for the Fire Department to provide pumper trucks after the earthquake. It sounds like the Department needs more pumper trucks of its own, not a considerably more expensive and damaging pipeline. Presumably, in emergency situations that do not require Fire Department resources elsewhere, the existing system is adequate to provide back-up water supplies to the West Valley in case of service interruption.
- c. The Department has not presented any studies to show that a pipeline in Mulholland Drive will be any less vulnerable to fire, seismic activity, etc., than a water line elsewhere.

3. Water Service — The Project Description says that one purpose of the water pipeline is to “provide water to already approved development in the southwestern San Fernando Valley.” It does not describe the location of that development, or the current or future demand for water service represented by that development that would justify this project.

4. Operation of Project — The description of the project is inadequate. It deals almost solely with the construction of the pipeline, and not with the impacts of the operation of the pipeline. The documents do not answer the following questions
- a. How much water will the pipeline carry?
  - b. How much of the water carried by the proposed pipeline is intended for the provision of service to the “already approved development”?
  - c. How much of the water carried by the proposed pipeline is intended to provide “reliability” in water supply to the west Valley?
  - d. What are the existing long-range projections and plan for providing water service to this area? Was this project included in those plans?
  - e. If this additional water supply is opened to serve an existing area, will that free up water elsewhere in the system and provide inducements to growth?

5. Alternatives — The report does not indicate that any alternative means of achieving the stated goals were considered or even identified. Identification of alternatives is necessary both for the CEQA process, and for the review of utility structures under the Mulholland Scenic Parkway Specific Plan, Section 5.A.5. Possible alternatives that should be discussed and considered could include:

- a. expanding existing water pipelines to the north
- b. enhancing the pressure in existing water lines serving the West Valley
- c. bringing water from the County system through existing inter-connections
- d. building the Kittredge improvements, and
- e. buying pumper trucks to use in emergencies (instead of relying on Fire Department trucks, which have other priorities).

6. Fire Protection — If fire hydrants are not a part of this project, why are they mentioned? If they may be added to this project in the future, they need to be addressed in this study. Otherwise, the Department is “piecemealing” this project without assessing the cumulative impacts of all of the project’s components.

## DESCRIPTION

1. Background — The Department states that the Corbin Tank water mains analyzed in the EIR were intended to “deliver water from Corbin Tank to area customers and fire hydrants.” The Department insists elsewhere, however, that fire hydrants are not part of this proposal. This discrepancy needs to be clarified.
2. Construction Methodology and Schedule — The description of the construction of the pipeline does not discuss the potential for disruption of wildlife habitat and movement throughout the length of the proposed construction site during these activities. The presence of men and machinery, the excavation of the roadbed, the storage of equipment and materials will alter the patterns of wildlife activity and movement in the parklands and open lands abutting the roadway and elsewhere in the vicinity. The Department has made no apparent effort to analyze, characterize or quantify these impacts.

The Department further proposes to install maintenance hole access covers in the embankment adjacent to the roadway. The Department does not specify whether this will be on the uphill or downhill slopes, but in any case the soil surrounding these structures will still be subject to erosion. The sight and presence of these facilities will be inconsistent with the appearance and use of the Parkway. The Department’s proposal to landscape these facilities to conceal them does not recognize either the open nature of plant growth in this area, or the difficulty in establishing and maintaining introduced landscaping.

3. Required Permits and Approvals — The Department states that “An Excavation and Class ‘A’ Permanent Resurfacing Permit” would need to be acquired. The documents do not explain how the Department proposes to “resurface” this roadway and whether any resurfacing will be consistent with the proposed historic designation of the roadway in its unpaved condition.

The documents also state that easements may need to be obtained from the

State of California for activities along the portion of the road that traverse state-owned lands. The Department does not explain where the roadway and the proposed pipeline cross State-lands. State lands in this area are primarily parklands and designated open spaces. There is not discussion of the effect of this project on those State-owned parcels.

## **EXISTING ENVIRONMENT**

1. Project Impact Zone — The Department states that “By nature of its use, no sensitive biological resources exist on the roadway that would be subject to impact from the proposed project.” This statement does not recognize that Dirt Mulholland has received very little vehicle traffic, and in fact has been closed to vehicle traffic for considerable periods. Consequently is not a typical roadway that can be presumed to be without “biological resources.” The Department should examine and evaluate the biological resources of the roadway, rather than presuming them nonexistent.

## **ENVIRONMENTAL IMPACTS AND MITIGATION**

1. Table 2, Daily Construction Emissions — This table indicates that there will be considerable vehicular activity hauling materials, excavating and hauling soil, and transporting cement and soil slurry, but the documents do not indicate where these materials are to be stored, used, or disposed of. These activities will have an environmental impact in addition to their vehicular emissions, but this is not discussed.
2. Table 4, Emissions from Fugitive Dust — This table indicates that truck wheel wells will be washed, but not where or how much water use is anticipated. The process and impacts of this washing activity should be described and evaluated.

## **EVALUATION OF ENVIRONMENTAL IMPACTS**

### **I. LAND USE AND PLANNING**

1. Conflict with General Plan designation or zoning (1.a) — This project could have a significant impact on the Mulholland Scenic Parkway and the implementation of the Mulholland Scenic Parkway Specific Plan. First, although the Specific Plan allows utility related structures, there must be a finding that feasible alternative locations outside of the inner corridor. The Department has not discussed alternative locations at all. Consequently, this project is not in compliance with the Specific Plan. Second, the Department has not discussed the impact of this project on the ability of the City to implement the Specific Plan in the areas to be served by this proposed water pipeline, including the currently undeveloped properties along the water pipeline route that potentially will be

served by this facility.

2. Conflict with existing environmental plans (1.b) — The proposed project will have a significant impact on “applicable environmental plans and policies adopted by agencies with jurisdiction over the project.” The project is inconsistent with the planning efforts of the Santa Monica Mountains Conservancy, the National Park Service, the California Department of Parks and Recreation, and the City of Los Angeles, as expressed in the Mulholland Scenic Parkway Specific Plan.

The Department states that the proposed project is intended to “improve the existing water demands in the project service area” (sic). How does the Department propose to “improve demand”? What does that even mean?

3. Compatibility with existing land use in the vicinity (1.c) — Because it is inconsistent with the Specific Plan and the planning efforts of the agencies listed above, the project will be incompatible with the existing land use in the vicinity. Further, because the project will make water service more readily available in an area that is currently undeveloped, the project has the potential to result in development that is inconsistent with the existing land use in the vicinity.

## II. POPULATION AND HOUSING

1. Population projections (1.a) — The project has the potential to impact local population projections significantly because it will make water service more readily available in an area that is currently undeveloped, and make additional water available to other parts of the service area.
2. Growth inducement (1.b) — The project has significant potential to induce growth, both directly and indirectly. The Department’s response to this issue does not address the question. By providing water to an area that currently has limited water service, the proposed project will make it more likely that properties that are currently not developed due to water restrictions will be the targets of proposals to develop, relying on the improved availability of water service created by this project.

## III. GEOLOGIC PROBLEMS

1. Fault rupture (1.a), seismic shaking (1.b), and ground failure (1.c) — This project poses a significant potential for fault rupture, seismic shaking, and ground failure. This potential is evidenced, by example, by previous rupturing of the Corbin Tank — which was presumably built in compliance with Uniform Building Codes — during previous earthquake episodes. Uniform Building Codes do not protect citizens and the environment where the risks of faulting and rupture are not uniform.



2. Landslides and mudflows (1.e) — The State Department of Conservation lists the region of the project site as having a potential for earthquake induced landslides. The Department of Water and Power, however, states — without any supporting data or analysis to controvert the Department of Conservation's findings — that it does not consider this risk significant. The Department should evaluate this risk in an EIR, rather than summarily dismissing it.

#### IV. WATER

1. Changes in absorption rates (1.a) — The compaction of the earth overlying the proposed pipeline has a significant potential to create a differential in absorption rates between the project site and the adjacent unpaved roadway. This differential could increase runoff and erosion of the roadway.
2. Water related hazards (1.b) — The potential increase in runoff and erosion discussed above has the further potential to result in landslides during normal rainfall events.
3. Leak and line failure — one area not addressed by these document is the likelihood that any leak or failure in the proposed pipeline would go undetected (as has happened in the past). Such undetected leaks could create hater hazards not only to the roadway and adjacent soils through saturation, but also to properties relying on the water line for water supply.

#### V. AIR QUALITY

1. Air quality standards — The documents make clear that the project will result in violations of SCAQMD standards, even with mitigation. These violations, their impacts, and complete mitigation should be examined further in an EIR.

#### VII. BIOLOGICAL RESOURCES

1. Species and habitats (1.a, 1.b, 1.c) — The description of impacts on the biology of Mulholland Drive and the Mulholland Scenic Corridor does not indicate that any analysis or survey has been done to document the potential impact of this project on either the species of the habitat of the area in the vicinity of the project. The Department's conclusion that the project will have no impact on biological resources is contradicted by the work of other agencies responsible for this area, including the Santa Monica Mountains Conservancy and the National Park Service.

#### XIII AESTHETICS

1. Scenic highway (1.a), aesthetic effect (1.b) — The presence of construction equipment, the erosion of the roadway from differential absorption, and the erosion around the maintenance valves will have a significant negative impact on

the scenic nature of this portion of the Mulholland Scenic Parkway.

#### XIV. CULTURAL RESOURCES

1. ~~Historical resources — The Department's documents do not recognize that the roadway itself is an historic resource, and has been proposed for nomination for the National Registry of Historic Places.~~

#### XV. RECREATION

1. Existing recreational opportunities (1.b) — The project has the potential to significantly disrupt the recreational use of the roadway both in the short term and the long term. Short term, the presence of equipment, haul trucks, excavation and construction will disrupt the use of the roadway by hikers, bikers, wildlife enthusiasts and others whose recreation is based on the roadway and its environs being substantially in a natural, undisturbed condition. Further, the inducement to growth along Mulholland Drive that will follow from this project will permanently detract from these recreational uses by reducing or eliminating the existing natural and undisturbed environment.

#### XVI. MANDATORY FINDINGS OF SIGNIFICANCE

1. Degrade the quality of the environment (1.a) — The project has the potential to threaten plant communities, reduce wildlife habitat and movement corridors, and to eliminate a major example from an important period in California history, to-wit, the dirt portion of the Mulholland Scenic parkway.
2. Short-term and long-term environmental goals (1.b) — This project will have significant long-term environmental consequences by making water service available in an area that is presently dominated by open space and undisturbed biota. It has the potential to induce growth both in the properties abutting Mulholland Drive, and in the other areas that will be served by this project.
3. Cumulative impact (1.c) — The Department's response to this issue focuses on the wrong impacts. The Department's response addresses the impacts on the "City's water service system." The question, however, addresses the cumulative environmental impact of this project. These are not addressed in the document, either in the checklist or in the text of the report.

In summary, the proposed negative declaration and initial report are inadequate, inaccurate, and not substantiated. This document should be withdrawn, and the Department of Water and Power should conduct a full environmental assessment and prepare an Environmental Impact Report on this project pursuant to CEQA.

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

Sincerely,

A handwritten signature in black ink that reads "Barry Read". The signature is written in a cursive style with a large, stylized "B" and "R".

Barry Read

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



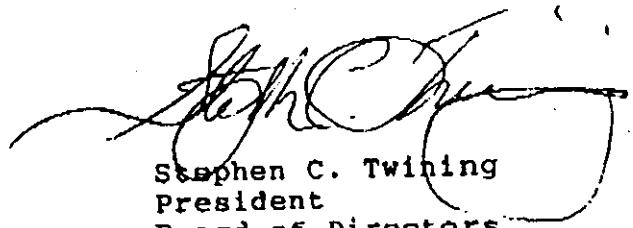
Roscomare  
Valley  
Association

July 14, 2000

Mr. Charles Holloway  
City of Los Angeles  
Department of Water and Power  
111 N. Hope Street, Room 1044  
Los Angeles, CA 90012  
Fax 213 367-3582

Re: Mulholland Water Pipeline Project

The Roscomare Valley Association representing 885 stakeholders in the Roscomare Valley of Bel Air demands that an Environment Impact Report (EIR) be prepared on the 11,000 foot pipeline proposed to be constructed on Dirt Mulholland.



Stephen C. Twining  
President  
Board of Directors

Copy  
Councilman Feuer  
Councilperson Miscikowski  
DWP Commissioners  
David Freeman, General Manager DWP

**santa monica mountains  
task force/sierra club  
angeles chapter**

TO: KEVIN LEW  
COPY



Box 344 • Woodland Hills, California 91365-0344

July 25, 2000

Charles Holloway  
City of Los Angeles, Dept. of Water & Power  
111 North Hope Street, Room 1044  
Los Angeles, CA 90012

Re: DWP's Proposed Mulholland Pipeline Project

Dear Mr. Holloway:

The Santa Monica Mountains Task Force (SMMTF) of the Sierra Club strongly objects to the proposal to extend a pipeline from the Corbin tanks on Dirt Mulholland westward to the end of Dirt Mulholland.

The SMMTF has, since 1972, been an environmental action group, working with various park agencies on protection of open space and natural resources, as well as on land use issues in and adjacent to parklands.

In addition, the Angeles Chapter of the Sierra Club passed a resolution on 5/21/2000, opposing the "Pipeline Project" on Dirt Mulholland.

The SMMTF also strongly opposes the negative declaration that has been filed. Because of the unstable hills along the pipeline's proposed route, there should be a full EIR required before plans for the project is allowed to go forward.


The pipeline will have devastating impacts on the surrounding areas. The construction of facilities to service the pipeline, such as manholes, air ventilation outlets, and hydrants, will scenically impact adjacent public parklands and demean the park experience for park users along this route.

Also, the building activities for such a project will significantly disrupt the wildlife habitat corridors and the sensitive biological resources.

The transporting of materials, the intense excavations, and the removal and hauling of soil will contaminate the surroundings and impact air quality standards. The pipeline will increase pressure to approve marginal housing developments along Mulholland and will increase pressure to pave Dirt Mulholland.

This project should not even be considered until a full EIR is implemented.

Cordially,

  
Mary Ann Webster, Chair, SMMTF  
Phone: (310) 559-3126. Fax: (310) 559-3136

**TOPANGA ASSOCIATION FOR A SCENIC COMMUNITY  
PO BOX 352, TOPANGA, CALIFORNIA 90290**

July 24, 2000

Mr. Charles Holloway  
Environmental Affairs Officer  
Los Angeles Department of Water and Power  
111 N. Hope Street, Room 1044  
Los Angeles CA 90012

**RE: MULHOLLAND PIPELINE INITIAL STUDY/NEGATIVE DECLARATION**

Dear Mr Holloway,

This organization which represents over 600 homeowners and residents in Topanga Canyon is very concerned with the Proposed Construction of the extension of a water Pipeline westward from the Corbin Water Tanks along Dirt Mulholland.

We have read the Negative Declaration and have the following comments:  
This Negative Declaration seems to be an inadequate Document for a project of this size. I refer you to a letter written on July 14, 2000 by Rosemary Woodlock, Attorney for the Woodland Hills Homeowners Organization. The points # 2, 3 and 5 have made a sound argument for a Environmental Impact Report to be completed for this project. Another point made was that the CEQA process has not been followed. There has not been an adequate study done in regards to Project alternatives.

It is particularly disturbing when we read a report done by Slosson And Associates, Consulting Geologists. In the report it states that "The original grading of Mulholland Drive produced a series of deep cuts of which many have been involved in landslide activity. As shown on geologic maps by the Los Angeles Department of Public Works, these features can cause slope failures during construction of the pipeline corridor. These can or may also create failure hazards during and after construction of the pipeline". What kind of mitigation would be needed to prevent this from happening? He goes on to state that The California Department of Conservation, Division of Mines and Geology lists the region of the Proposed Project as a potential earthquake-induced landslide area.

Surely the Department Of Water and Power has concern for its workers during the work being proposed. What would be the effect of a landslide occurring during the construction phase.

It is for these reasons and many more that we will bring to the Public meeting that we again request that further study be done in the form of a full EIR for this project before any construction is allowed to proceed.

Sincerely yours,

A handwritten signature in cursive script that reads "Roger Pugliese". The signature is written in black ink and is positioned above the typed name and title.

Roger Pugliese  
Chairperson

Cc: Cindy Miscikowski-Council member

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P  
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A

Tarzana Property Owners Association, Inc.

July 14, 2000

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

## RE: MULHOLLAND WATER PIPELINE PROJECT

Dear Mr. Holloway

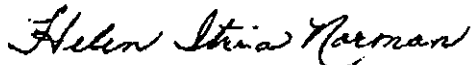
This is in response to your letter of June 12, 2000 and proposal to adopt a Negative Declaration for the Mulholland Water Pipeline Project.

Because the proposed Negative Declaration fails to address the geologic hazards and other risks the project would be subject to, even if mitigated, we are requesting that an EIR be prepared before decisions and construction are allowed to proceed. In support of this request, a report on the geologic aspects associated with the project prepared by Dr. James Slosson, Chief Engineering Geologist of Slosson and Associates, is attached.

In addition, we challenge the comment in the report that states the project would not be growth inducing when, as you are aware, no less than two developments in the same area are poised to proceed with their plans when a water source of guaranteed volume and pressure are readily available.

We will appreciate your serious consideration of this request and look forward to hearing from you.

Sincerely,  
TARZANA PROPERTY OWNERS ASSOCIATION, INC.



Helen Itria Norman, President  
Board of Directors

Copy: Councilwoman Cindy Miscikowski



**SLOSSON AND ASSOCIATES**  
CONSULTING GEOLOGISTS

15500 Erwin Street, Suite 1123  
Van Nuys, California 91411  
(818) 376-6540 • (818) 785-0835  
FAX (818) 376-6543

July 14, 2000  
S&A #991018

**TO:** Tarzana Property Owners Association, Inc.  
P.O. Box 571448  
Tarzana, CA 91357

**SUBJECT:** Review of the DWP Mulholland Pipeline Report from Corbin Tank to Picasso Avenue Along Unimproved and Improved Portions of Dirt Mulholland

A visual field view of the topography, geomorphology, and geologic environs of the proposed pipeline route was conducted on July 12, 2000 following a review of the November 4, 1997 Mulholland Pipeline Report and the Draft Negative Declaration and study for the Mulholland Water Pipeline Project dated June 12, 2000, published by the City of Los Angeles Department of Water and Power. This review and field observation indicated that there was a complex and complicated geologic setting that appears to have been grossly overlooked when determining the geologic environs of this portion of the Mulholland corridor.

The 1960 to 1970 geologic mapping project compiled and completed by the Los Angeles City Department of Public Works and released in 1982 by the Association of Engineering Geologists depicts a geologic setting wrought with many geologic hazards. These geologic hazards include landslides, slope stability failures, and unstable geologic slopes. This geologic setting is subject to severe erosion, and slopes prone to rainfall induced slope failure. This area is also prone to earthquake-related failures similar to the problem associated with the damage caused by the 1994 Northridge earthquake along Mulholland, east of the 405 Freeway and in the hills in this vicinity. Per the mapping and observations, this area has been faulted, folded, sheared and jointed. The past tectonic activities have greatly reduced the strength of these earth materials.

In our field review of the proposed pipeline project we noted:

1. A predominance of adverse dips and adverse joints, fractures, and shear planes exposed in the road cuts along Mulholland Drive. These are observed in the road cuts and natural slopes and some were plotted on the geologic maps by the Department of Public Works. This series of adverse conditions has lead to landslides which have adversely affected the slopes

Tarzana Property Owners Association

(2)

July 14, 2000  
S&A #991018

above and south of the Mulholland corridor as well as affecting the slopes north of the corridor.

2. The rock materials along the alignment are highly fractured, jointed and sheared which exacerbates the adverse nature of the bedrock (not a true coherent assemblage of rock material but an assemblage that is prone to slope failure). This fracturing, jointing and shearing lowers the overall rock or earth material strengths.
3. The prominent geometry of the bedrock is a prevailing dip of the bedrock to the north or towards the Ventura Freeway. This is very typical to the north slopes of the Santa Monica Mountains and results in a geometry that enhances failures to the north.
4. The original grading of Mulholland Drive produced a series of steep road cuts of which many have been involved in landslide activity. As shown on the geologic map by the Los Angeles Department of Public Works, these features can cause slope failures during construction of the pipeline corridor. These can or may also create failure hazards during and after construction of the pipeline and may or can adversely affect the operation and maintenance of the pipeline. These landslides which occurred were most likely reactivations of existing landslides due to the adverse geologic conditions of the area.
5. These conditions could have an adverse impact on the operation and maintenance of fire hydrant stand pipes, as well as the regulating or maintenance stations.
6. Any possible plan to pave Dirt Mulholland may or could require roadway reconstruction and probable increased cost related to pipeline replacement and/or relocation to adjust/alignment and/or grade of Mulholland Drive and a significant cost factor.
7. Future earthquakes may cause damage to slopes, roadways, and the proposed pipeline. Earthquake hazard should be adequately addressed via the necessary EIR.
8. The location and operation and maintenance of the existing petroleum pipeline in and about the Mulholland corridor and in the area of the proposed water supply pipeline history of operation of the Petroleum pipeline should be addressed in the EIR. This should include any breaks, leaks, repairs or other things related to this petroleum pipeline since it was placed.

Tarzana Property Owners Association (3)

July 14, 2000  
S&A #991018

9. The overall operation and maintenance of Dirt Mulholland should be addressed as it is known that winter rainfall, especially during wet years, may adversely affect the use of Dirt Mulholland throughout the winter and spring periods of the year.

The negative declaration also indicates pipeline is consistent with the Mulholland scenic parkway proposal which calls for irrigation of park-type lands along stretches of the roadway. The increase in water from irrigation can trigger or lead to possible reactivation of landslides or possibly induce new landslide activity unless adequately mitigated. Therefore, the statement related to landscape irrigation is misleading and erroneous related to the proposed future landscaping along the Mulholland corridor.

It should be noted that the "Draft Negative Declaration and Initial Study for the Mulholland Water Pipeline Project" dated June 12, 2000 may have some errors and omissions in evaluation of environmental impacts, specifically in Section III, Geologic Problems.

Following is a listing of those items that may be in error. The items are listed by the letter designation as shown in Section III:

- "b) Seismic ground shaking?" It is indicated that this is a less than significant impact. It states "The Los Angeles area is seismically active and subject to varying degrees of ground shaking from seismic events. The proposed project would be designed and constructed with these considerations. This effect is not considered to be significant." The 1994 Northridge earthquake indicated that typically ridge tops or ridge lines are areas where seismic shaking is significantly increased. Additionally, it was noted that there is increased seismic shaking in the area of existing faults and/or sheared areas. As seen on the Los Angeles City Department of Public Works geologic maps, this area has numerous mapped faults. The seismic ground shaking should be considered to be "potentially significant unless significant mitigation is incorporated" or "potentially significant impact." The highest ground acceleration recorded during the 1994 Northridge earthquake was approximately two miles north of the proposed pipeline construction.
- "c) Seismic ground failure, including liquefaction?" It is indicated that the seismic ground failure, including liquefaction, landslide activity, strong ground shaking, slope stability problems, etc., is listed in the "less than significant impact" heading. It further states "The California Department of Conservation, Division of Mines and Geology (Canoga Park Quadrangle) lists the proposed project site as a potential liquefaction area. Liquefaction is a phenomenon associated with fine to medium sized cohesionless sand in a relatively loose state and saturated with water. Since the project site is a bedrock site on a hill top location where groundwater is not present, and the project would be shallow in depth, this potential is negligible." It should be noted that there are definitely other types of seismic ground failure which must be addressed besides just liquefaction. These

Tarzana Property Owners Association

(4)

July 14, 2000  
S&A #991018

other types of seismic ground failure include ground lurching, rock fall, landslide activity and reactivation (serious ground failure problems plagued the Mulholland Drive west of the 405 Freeway causing high damage costs). Also, one of the reasons for construction of this proposed pipeline was the loss of water supply due to pipeline-earthquake induced failure during the Northridge earthquake westerly and near the proposed pipeline construction terminus. There will be a further discussion regarding landslides under the heading "e". There are portions of this project that will be in areas of alluvium or artificial fill at or along the far west end of this project. There exists high groundwater and liquefaction materials in this area that need to be evaluated and considered. Additionally, there should be a proper evaluation of the other terms or types of seismic ground failure which may occur. This section should be properly evaluated or placed in the "potentially significant unless mitigation incorporated" or "potentially significant impact."

- "e) Landslides or mudflows?" This section is listed as "less than significant impact." It states "The California Department of Conservation, Division of Mines and Geology (Canoga Park Quadrangle) lists the region of the proposed project site as a potential earthquake-induced landslide area. Project construction would not affect the regional geomorphology of the area. There would be a temporary exposure of workers to this potential during the period of construction only. This effect is not considered to be significant."

Based on the Los Angeles City Department of Public Works Geologic Maps, this area has many landslides along this route. These landslides are susceptible to being seismically triggered and some may have been subject to motion during the Northridge earthquake, as well as high rainfall events, increased water as in irrigation, broken water lines, or poor drainage. The impact of any of these landslide reactivations, by whatever means, needs to be evaluated as they are a hazard. This section should definitely be listed as "potentially significant unless mitigation incorporated" or "potentially significant impact." Landslides are one of the more significant geologic hazards along the proposed project route. Most of the project alignment is within property owned by the Conservancy and was not evaluated for damage by the State of California Department of Conservation.

- "f) Erosion, changes in topography or unstable soil conditions from excavation, grading, or fill?" The response to this item is misleading as the current condition of Dirt Mulholland will most likely require corrective grading related to the pipeline construction as well as resurfacing following the pipeline placement. This item should be shown as "potentially significant unless mitigation incorporated."
- "h) Expansive soils?" The bedrock in this immediate area is noted for the development of expansive soils resulting from weathering and/or erosion and/or sediment transport resulting from natural and man-induced changes. Thus, this item should be changed to "potentially significant unless mitigated."

Tarzana Property Owners Association (5)

July 14, 2000  
S&A #991018

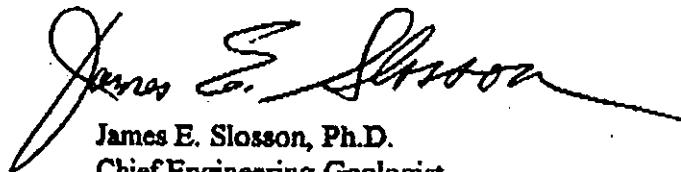
Following is a listing of those items that may be in error. The items are listed by the letter designation as shown in Section IV:

- "a) Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff?" Any introduction of water for irrigation, any change in land use creating urbanization, development of paved streets, storm drains, etc., may increase runoff, ponding of water, any increase in the capacity to increase the possibility of increase influent seepage may, unless mitigated, increase runoff of groundwater.
- "b) Exposure of people or property to water related hazards such as flooding?" This section should be changed to "potentially significant unless mitigation is incorporated" unless there is a moratorium on construction during the rainy season (October 15 through April 15)

Following is a listing of those items that may be in error. The items are listed by the letter designation as shown in Section IX:

- "e) Increased fire hazard in areas with flammable brush, grass, or trees?" The presence of an oil company pipe in near proximity should be considered and thus the declaration should be changed to "potentially significant unless mitigation is incorporated."

In conclusion, there are various items referred to in the Negative Declaration that are misleading and appear to be incorrectly responded to that should be changed from "no impact" or "less than significant impact" to "potentially significant unless mitigation is incorporated." Items related to seismic and other geologic hazards should more correctly be changed to "potentially significant impact." Thus, there should be a full EIR required before decisions and construction are allowed to proceed.



James E. Slosson, Ph.D.  
Chief Engineering Geologist  
R.G. #46, C.E.G. #22, G.P. #829

JES:cg

Ref:COZip, Tarzana Property Owners Assn.

*Protecting The Integrity Of Our Community*



**WHHO**  
**Woodland Hills**  
**Homeowners Organization**  
P.O. Box 6368, Woodland Hills, Ca 91365

July 14, 2000

Charles Holloway  
Environmental Affairs Officer  
111 N. Hope Street, Room 1044  
Los Angeles, CA 90012

The enclosed is Woodland Hills Homeowners Organization's response to your Negative Declaration for the propose project, Mulholland Water Pipeline, Case No. WP-213-00.

There are three attached pages with our response. We have continually stated that this project is not needed and a gift of public money. Also we find that this to be considered requires a full EIR.

Thank you for allowing us the opportunity to respond to this document.

Respectfully:

A handwritten signature in cursive script that reads "Gordon Murley". The signature is written in black ink and is positioned above the printed name and title.

Gordon Murley  
President

Response to Negative Declaration and Initial Study for the  
MULHOLLAND WATER PIPELINE PROJECT, Case No. WP-213-00

From: Woodland Hills Homeowners Organization  
4128 Morro Drive  
Woodland Hills, CA 91364

We find that this study is in direct conflict with a letter dated May 17, 1998 from S. David Freeman, General Manager Department of Water and Power.

This letter stated that "The Mulholland Pipeline is not a high priority at this time. If a developer is interested in service in this area, we will work with them in installing a line at their expense, provided the appropriate environmental clearances can be obtained."

Nothing has changed that would make this an extremely high priority, nor has this ever been something that would benefit the public by installing a water line on dirt Mulholland. This is a gift of public funds to a developer who in his EIR stated they would get water from another source. Now he is demanding the public subsidize his proposed development. This is unacceptable to build something that will not benefit the public that could be much better accomplished by DWP better planning its projects and not using a ruse to aid a proposed development that cannot be built as proposed in their EIR.

This project misrepresents the need for this project. The integrity of the system is low due to the age of the pipes in the system and not what any earthquake would do. Already we have had, without earthquakes, numerous water main failures due to not replacing known problems in the system. Putting a line down dirt Mulholland to service one proposed development is absurd. If the rest of the system were brought up to standard there would be a system with integrity that would withstand an earthquake with little or no problems.

All of the water distribution for the development north of Mulholland takes their water from below. There are no developments on the south side of Mulholland. The Gerard reservoir was deemed unnecessary and taken out of service. There have been, according to this document, 31 complaints over ten years. It does not state 31 separate residences. This amounts to 3 complaints a year or approximately 1 every four months, which is extremely low for any area of the city or county. It is even possible that the same resident could have complained more than once on the same day. To try and use this as substantiation to provide a water line for a proposed development at public expense is pushing credibility to the extreme limits.

The description of developments and where they exist is inaccurate. Trinidad road is the most eastern road on Mulholland for the Gerard Tract. Marcos Rd. mentioned is merely a paper street with no water lines or houses from Mulholland.

Since the developments get their water from below and the north, under any circumstance it would be better to take the water from the Corbin tank down Greenbrier and Van Alden to

*Handwritten note:*  
See page 10

Wells Dr. and west to Dumetz and tie into the Topanga lines that service the area and the distribution lines.

In the EIR for the Corbin tank the justification for building the tank was to improve the water pressure for the area of Greenbrier and Van Alden area for both residences and fire hydrants. The Corbin tank was built on a fault in spite of testimony at hearings and response to the EIR that this a problem. The grading was redone because of slope failure at construction time. The tank itself has been out of service do to this unstable land it is on, and I believe it was damaged in the Northridge earthquake.

We find that the determination to do a Negative Declaration is improper. It states that it could have significant effects and yet it is not a Mitigated Negative Declaration. This Department is not following CEQA and is using its own and is contradictory in its self the way it is filled out. Therefore, we demand that a full environmental assessment (EIR) be done, despite that fact that we protest the gift of public funds to subsidize a proposed development that created its own problem of water supply.

**RESPONSE TO ENVORNMENTAL IMPACTS** starting on page 14 of the Negative Declaration.

#### **I. Land Use and Planning**

**B) The response is incorrect. The existing land use is open space and parkland. Therefore to put in growth inducing infrastructure defeats preserving desperately needed open space and wild life areas.**

#### **II. Population and Housing**

**a) This response is incorrect because it does not do anything except for on proposed development that created its own problem and now wants to be bailed out by the taxpayers and DWP existing customers for its own financial gain. It has nothing to do with public safety since it was stated in the May 17, 1998 letter that this was a low priority. Therefore this would pose to exceed the proposed populations projections of the Los Angeles General Plan and the Community Plans.**

#### **III. Geologic Problems.**

**a). This incorrect. In the 1994 earthquake not only the Corbin tank site, but all areas of dirt Mulholland suffer land slides including the proposed development that this is being done at ratepayers monies to subsidize. The slides were significant.**

**b) To ignore DWP's own lack of concern as to the potential is again saying, until we have a disaster due to our poor planning and engineering none exists nor is there any potential.**

**c) Perhaps the Department should go back and understand the real potential of liquefaction and not once again cavalierly dismiss this as it hasn't happened yet therefore we see no potential in spite of its listing.**



- e) This answer evades the fact that the potential is there and addresses as short term any problems.
- f) This evades the unstable soils all along the proposed route and the numerous landslide areas and the fractured bedding plane.
- h) Since we have not seen or have when and where they did their soils tests one cannot make an informed statement.
- i) Once again, not knowing the soils report how can one make an informed statement

#### IV. Water

- a) There is considerable erosion where watercourse is changed and they are not minor. A supposition is not good enough to say it could not become significant.
- b) Read answer a).

#### ITEMS V, VI, VII, IX, X

These are not acceptable since this project has no need now or in the future since it serves no one but a developer who wants the ratepayers to subsidize a self imposed hardship, and it is not the public's responsibility to bail people out of a bad investment.

#### XIV. Cultural Resources

- a) It is our understanding that the Corbin site had paleontological significance and as usual the City of Los Angeles and DWP ignored that. Doubt anything short of multi-million dollar lawsuit would even begin make officials adhere to following CEQA.

#### XVI. Mandatory Findings of Significance

- a) This will potentially affect the open space and wild life of the area.
- b) This is not true. Pipes can only hold so much water therefore there is no additional water. All the water exists now.
- c) It certainly is cumulative because it will be used to alter the community plans and general plans on growth.
- d) Since humans rely on the ecosystem, the loss of animal diversity will increase the rat and mice populations because of loss of vital habitat for Hawks, coyotes, bob cats, snakes and other predators that are our natural rodent control agents at no cost to the government.

This whole document is lacking vital information and shifts all responsibility to the public to seek out information that is vital. The obfuscation in this document is as monumental and deliberate to try and stick the public to subsidize a private developer who created his own problems and now wants the ratepayers to give a gift of public funds that will only benefit his proposed development. This is totally unacceptable since running the pipeline down Mulholland and not offering any alternatives is blatantly not in the public's interest not what CEQA is all about.

RECEIVED  
JUL 13 2000  
CES

July 11, 2000

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

RE: Mulholland Water Pipeline

Dear Mr. Holloway:

I am a homeowner in the Girard Tract of Woodland Hills. My street, Rosario Rd., is one of the few streets connecting to dirt Mulholland. I am writing this letter in protest of the "Negative Declaration" regarding the construction of a water pipeline on dirt Mulholland. How this can be seen as anything but the sham of developers attempting to get water to an area for their own purposes is beyond me.

People have been trying for years to develop along Mulholland. Current developers have even resorted to clandestine bulldozing to get around restrictions on grading, etc. Only through the diligence of local homeowners have these things come to light.

This pipeline is just the next "project" being slipped by the community. With high sounding words the true meaning of this pipeline is being hidden. What it really means is the potential for more development in an area already under pressure from over building. The potential for paving one of the few undeveloped recreational roads left in the area. The potential for increasing traffic on substandard roads connecting to Mulholland. The potential to benefit no one but developers at the expense of the people who live and play in the area.

I am against this project and the way in which it has been pushed along towards approval. This is not in the community's best interest.

Thank you,



Albert A. Friss  
4229 Rosario Rd.  
Woodland Hills, CA 91364  
(818) 990-7270

Jon Stout  
3126 Hodler Drive  
Topanga, Ca 90290

July 3, 2000

Re: Extension of pipeline from Corbin tanks on Dirt Mulholland westward.

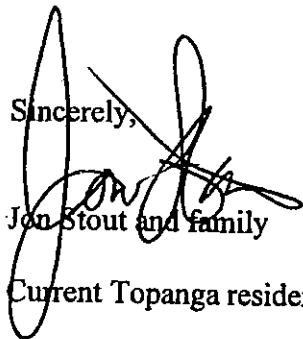
Position: **IN FAVOR**

Dear Commissioners,

**Please approve the proposed pipeline.** Our city has a responsibility to provide the infrastructure for future development. Disallowing development is disallowing needed places for people to live. The "activist" NIMBY's opposed to this are perfectly satisfied with their living in the area and are attempting to keep everybody else out with their arrogant and selfish attitude.

Providing homes is not a crime.

Sincerely,



Jon Stout and family

Current Topanga resident for 12 years

Jim Hasenauer  
4359 Pampas Road  
Woodland Hills, CA 91364

**RECEIVED**  
**JUL 17 2000**  
**CES**

talk: 818-704-7396  
Fax: 818-704-4827  
email: imbajim@aol.com

July 12, 2000

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

Dear Mr. Holloway,

I live in a Woodland Hills neighborhood close to Dirt Mulholland. I am writing to say that I oppose the proposed water pipeline and I feel the Negative Declaration that you've prepared to support it is flawed in significant ways.

The pipeline facilitates real estate development in open space. It's a publicly supported windfall for the 21000 Mulholland project. The proximity of water and ease of hookup will also raise property values of all adjacent undeveloped land. This inflates the cost of potential parkland. Public agencies who must buy land at appraised fair market value will face de facto higher prices because of this project. Open space will not be acquired (even from willing sellers). You must take these implication into account.

The negative declaration completely ignores the impacts of the pipeline construction and maintenance on plant and animal life. This is unacceptable. The whole purpose of CEQA is to ascertain impacts on natural resources. You ignore the most endangered natural resources in urban Los Angeles, the native plants and animals that inhabit our wildlands and open space. This is a significant omission and should be addressed by the more substantial EIR process.

The document is also seriously flawed in commission with several unsatisfactory answers to questions. This too requires a higher level EIR. Here are three specific places where the Negative Declaration is clearly inadequate:

On p. 14, item 1c, "would the project be incompatible with existing land use" The document says no impact. In fact, the existing land use is open space preservation, native plant and animal habitat, and semi-primitive non-motorized recreation (walking and bike and horse riding). The installation of the pipeline significantly affects all three. It diminishes open space, disrupts native plan and animal habitat and impedes or discourages recreation.

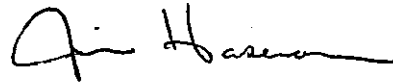
On p 24, item XVI, B, "Does the project have the potential to achieve short term to the disadvantage of long term environmental goals." You answer "no impact", but the project

facilitates new housing development not only at 2100 Mulholland but to any developer along the dirt Mulholland corridor. The long term environmental goal of a continuous, resource rich, open space in the Santa Monica Mountains National Recreation Area is very much disadvantaged.

On p. 24, item XVI, C, "Does the project have impacts that are individually limited but "cumulatively considerable". Again you answer "no impact" and again this completely misreads the implications of the project on potential development of what is now and should remain open space. As stated above, the pipeline provides easy access to water and therefore facilitates development to both 2100 Mulholland and all other adjacent land owners. This raises the cost of land and puts public agency acquisition programs at a distinct disadvantage.

The Negative Dec is flawed as is the project. If you intend to continue with the proposed project you must do a full EIR. Please keep me informed of all information related to this project.

Best wishes,

A handwritten signature in black ink, appearing to read "Jim Hasenauer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jim Hasenauer

cc. Art Eck, SMMNRA  
Russ Guiney, CDPR  
Joe Edmiston, SMMC

July 28, 2000

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

RE: Dirt Mulholland Pipeline

Dear Mr. Holloway:

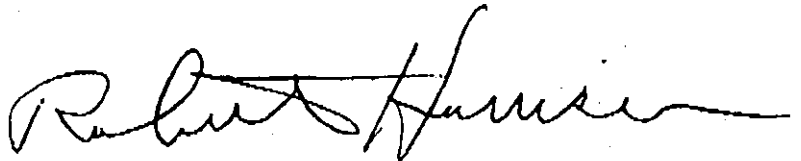
We are homeowners on Trinidad Road which has its sole access by way of Mulholland Drive. We are concerned that the discussion of the closure of Mulholland Drive and the intention of beginning the construction project during the rainy season does not adequately discuss the problems we and our neighbors would face.

We are also concerned that the construction of the water pipeline would result in erosion and the need to "improve" Dirt Mulholland by paving it.

For these reasons, we request that a full environmental impact report be prepared in order to discuss all the alternatives to and impacts of your proposed pipeline project.

Sincerely,

Robert Harrison  
Lois Harrison  
4079 Trinidad Road  
Woodland Hills CA 91364



July 28, 2000

Mr. Charles Holloway  
City of Los Angeles  
Department of Water and Power  
111 N. Hope Street, Room 1044  
Los Angeles CA 190012

RE: Dirt Mulholland Pipeline


Dear Mr. Holloway:

I am a resident of Trinidad Road which has its sole access by way of Mulholland Drive. I am concerned that the discussion of the closure of Mulholland Drive and the intention of beginning the construction project during the rainy season does not adequately discuss the problems I and my neighbors would face.

We are also concerned that the construction of the water pipeline would result in erosion and the need to "improve" Dirt Mulholland by paving it.

For these reasons, we request that a full environmental impact report be prepared in order to discuss all the alternatives to this proposed pipeline and the impacts of your proposed pipeline project.

Sincerely,

  
4015 Caravana Rd.  
Woodland Hills CA 91364

July 1, 2000

RECEIVED

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

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ADMINISTRATIVE  
SERVICES  
CESBU

Dear Mr. Holloway:

I'm writing to oppose your Department's intention to adopt a "Negative Declaration" for the Proposed Mulholland Pipeline project. In particular, I find your statement that the Pipeline will "... *not induce growth in the area* ..." (your response to question II.b on the "Environmental Checklist Form") to be disingenuous.

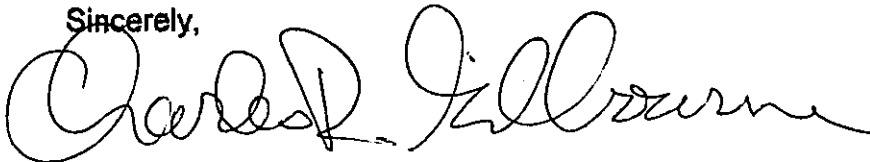
**Mr. Holloway, can you site a single example of where your Department made water available to an undeveloped area -- even if owned by the public -- where the area was not subsequently developed? If you can not, you must retract your claim.**

By "development", I mean construction of all types not just real estate development. I include construction of public facilities such as the SMMC's Marvin Braude Mulholland Gateway Park, or other projects that may be proposed: the "Cindy Miscikowski Botanical Garden", the "Villaraigosa Parque de Fútbol", the "Jackie Goldberg Free Speech Plaza", and the "Brad Sherman Outdoor Theater for the Performing Arts".

When you add water, growth will come. It will be induced by the real estate market in the case of privately held land and it will be induced by political forces in the case of public land. Growth, regardless of its source, will irrevocably destroy the area's current status now known as the "Big Wild" -- one of the last large and unspoiled remnants of Los Angeles as it existed before your Department's founder, Mr. William Mulholland, brought water to our city from the Owens River in 1913.

If you can not site an example where the availability of water to an undeveloped area did not induce growth, you must retract your proposed Negative Declaration and conduct a full EIR so that the true impact of this project can be properly assessed and debated among the public.

Sincerely,



Charles R. Milbourne  
4228 Lobos Road  
Woodland Hills, CA 91364  
(818) 716-1028

cc: Councilwoman, Cindy Miscikowski  
Supervisor, Zev Yaroslavsky  
Assemblywoman, Sheila Kuehl  
Congressman, Brad Sherman



James and Joan Moser  
21441 Picasso Place  
Woodland Hills, CA 91364

August 9, 2000

Mr. Charles Holloway, Environmental Affairs Officer  
City of Los Angeles  
Department of Water and Power  
111 N. Hope Street, Room 1044  
Los Angeles, CA 90012

Re: Opposition to the Mulholland Pipeline

Dear Mr. Holloway:

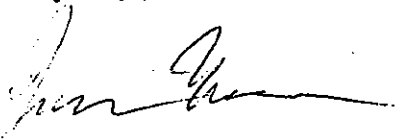
I am writing this letter in opposition to the Mulholland Pipeline proposal. We live in the surrounding area of this proposed project and we believe that this pipeline project is not being proposed simply to provide more water accessibility to this area as the DWP would like us to believe, but is being proposed to develop Dirt Mulholland and the open space surrounding it to permit traffic between the 405 and Topanga Blvd. and to provide water to a planned gated community at the end of Dirt Mulholland (21000 Mulholland). This development is called the "Reserve". The Developer is EPAC.

We believe that this project will harm the impacted environment to the detriment of the citizens living in these surrounding areas.

Please consider the wishes of the residents and the negative impact of this project and do something to stop it.

Thank you.

Very truly yours,



cc: Councilwoman Cindy Miscikowski  
Assembly Woman, Sheila James Kuehl  
L. A. County Supervisor, Zev yaroslavsky  
Congressman, Brad Sherman

July 13, 2000  
Colleen and Tony Palermo  
21428 Mulholland Drive  
Woodland Hills, CA 91364

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

Dear Mr. Holloway,

We are concerned about the proposed Mulholland Water Pipeline Project. According to your letter, "no potential significant effects would occur to environmental resources from the proposed project." To our minds, a 12 to 16 month disruption in traffic, noise and air quality along a stretch of road that includes a sizable portion of the Mulholland Scenic Parkway is very significant.


Those of us who work at home and/or have young children with allergy and asthma conditions are apprehensive about the dust, debris, noise and disruption to our water service that construction will entail, though we realize that necessary maintenance of our public water system is an unavoidable fact of life.

However, our greater fear is that the stated purpose of the project, "to improve overall water system reliability to water system users in the southwestern San Fernando Valley..." masks the private interests of the developer who has been trying to circumvent the Homeowner's Association and the Santa Monica Mountains Conservancy in order to build a housing tract off dirt Mulholland east of Canoga Avenue.

A city water pipe damaged in the '94 earthquake has been leaking downhill behind Dan and Dot McCarthy's house on Monet Avenue for six years, wasting an enormous volume of potable water and creating slippery, stagnant puddles on Monet and Mulholland -- that receives no City attention, despite numerous letters and phone calls. But your department will spend millions of dollars and a year and a half ripping up miles of dirt road in the name of improving "overall water system reliability."

Please enter our comments into the public record with the knowledge that we are not pleased and that a number of us will see you at the hearing on August 15.

Sincerely,

  
Colleen & Tony Palermo, 21428 Mulholland Drive  
Jeanette & Michael O'Brien, 21438 Mulholland Drive  
John & Robin Hawley, 21444 Mulholland Drive  
Les & Donna Fresholtz, 4114 Monet Avenue

Cc: **Congressman Brad Sherman, 24<sup>th</sup> District, California**  
**Councilwoman Cindy Miscikowski**

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AUG - 8 2000  
CES

Mr Charles Holloway  
City of LA  
DWP  
111 N Hope  
LA, CA 90002

Re: Proposed pipeline / dirt Molluskland

Dear Mr. Holloway:

I write as someone who cares very much about preserving the pristine environment of the Santa Monica mountains. I know I am only one of millions of voters and DWP customers in the L.A. area that share my concerns.

These lands once disturbed can never be returned to their original condition. Please do not allow the money making and greedy concerns of a few ruin part of our heritage that cannot be replaced.

Please think of the part you play in making the world a better place; not contributing to ruining our environment.

Please do what you can to halt the proposed pipeline from Corbin Tank near Topanga State Park.

Thank you;  
Sarah Priest  
243 Amy Way  
Torrance, CA 90290 . 310-455-3547

2 pages  
213-367-3582

Joan and David Quandt  
P.O. Box 167  
Woodland Hills, CA 91365

July 28, 2000

Mr. Charles Holloway  
Environmental Affairs officer  
Los Angeles Department of Water & Power  
111 N. Hope Street, Room 1044  
Los Angeles CA 90012

RE: Dirt Mulholland Pipeline

Dear Mr. Holloway:

First of all, we object to the fact that no notice of the proposed pipeline project was posted along the pipeline route. Had it been, we would have been aware of this project earlier.


We will shortly begin reconstruction of the house at 4053 Trinidad Road which was destroyed in the Northridge Earthquake. We are concerned that the proposed pipeline construction has not taken into account the fact that Trinidad Road has no other access than by way of Dirt Mulholland. Marcos Road and Casa Blanca Road are both "paper" streets and completely impassable. Using Santa Maria Road, even for a short while, is simply NOT an option for us.

While traffic on Dirt Mulholland Drive is blessedly not at the level of a normal road, we believe that the proposed project does not adequately take into account the amount of traffic that does exist as well as the increased traffic our construction will need. The proposed project description most certainly does not appear to understand the fact that Santa Maria Road is a private road incapable of supporting non-local construction vehicles and that the extra milage for us (probably over 25 miles) is substantial.

We request that the Department of Water & Power prepare an environmental impact report on this project before any decision is made.

Thank you for the opportunity to comment.

Sincerely,

  
Joan Quandt

Post-It® Fax Note 7671		Date 7/28/00	# of pages 3
To Kelvin Lew		From R. Woodlock	
Co./Dept.		Co. WHHO	
Phone # 213-367-3582		Phone # 818-703-7609	
Fax #		Fax #	

July 28, 2000

Mr. Charles Holloway  
 City of Los Angeles  
 Department of Water and Power  
 111 N. Hope Street, Room 1044  
 Los Angeles CA 190012

RE: Dirt Mulholland Pipeline Project

Dear Mr. Holloway:

We own and operate the Double E Ranch and kennels. As propertyowners and businesspeople whose only access is directly onto the dirt portion of Mulholland Drive, we are concerned that the plans for the closure of Mulholland Drive and the Intention of beginning the construction project during the rainy season is not adequately discussed or thought out. If the road is closed in either direction, we face more than just a slight inconvenience and many of our customers may not want to drive the extra twenty miles in and out to get here. Also, many people are unaware that they can use Santa Maria Road and the owners of Santa Maria Road may not want to introduce those people to this "shortcut" through Topanga Canyon. We request that a full environmental impact report be prepared in order that we may see and understand all the possible alternatives to this project and the impacts of your proposed pipeline project on us and our business.

Sincerely,

*Mrs. Cardine Rose*

*20700 Mulholland Dr  
 Woodland Hills Ca 91364*

*Mrs. Judy Cherpin*

*20690 Mulholland Dr.  
 Woodland Hills Ca. 91364*

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HELEMARY DEALEY WOODLOCK  
ATTORNEY AT LAW  
21015 Northland Drive, Woodland Hills, CA 91364

Telephone (818) 703-7609  
Facsimile (818) 703-7692

July 14, 2000

Mr. Charles Holloway  
Environmental Affairs Officer  
Los Angeles Department of Water and Power  
111 N. Hope Street, Room 1044  
Los Angeles CA 90012

RE: MULHOLLAND PIPELINE INITIAL STUDY/NEGATIVE DECLARATION

Dear Mr. Holloway:

These comments are written on behalf of the Woodland Hills Homeowners Organization ("WHHO") and focus on the legal inadequacy of the Initial Study Negative Declaration ("NegDec IS") for this project and, pursuant to my conversation with Kelvin Lew, being faxed today. A further set of comments will immediately follow by mail and will include the photographs I took on July 12, 2000 at the request of the Department.

I. Inadequate Notice and Availability. WHHO strongly protests the failure of the Department of Water and Power to notify the residents of Santa Maria Road (not "Avenue") since this private road is proposed as an alternative route during construction and could be closed to public traffic and its failure to provide a copy of these documents to the Woodland Hills Public Library and the failure to include a separate discussion of the items as required under Item XVII (Earlier Analyses), including all earlier analyses relied upon, all impacts previously addressed, and all proposed mitigation measures.

II. Use of Negative Declaration Fails To Reveal Ratepayer Subsidy. In addition, this Project is only a slightly disguised version of that presented in 1997 which was a blatant ratepayer subsidy of a very small development (2-4 homes) which had received City approval by representations that water was available from the County of Los Angeles and that the property would be purchased for parkland. Because that 1997 Report listed several alternatives to the pipeline, it ill behooves DWP to attempt to avoid an EIR.

III. Use of Negative Declaration Fails To Comply With City Law. A discussion of alternatives also appears to be avoided by the use of a Negative Declaration. However, DWP recognizes that the Mulholland Scenic Parkway





Mulholland Pipeline Negative Declaration/Initial Study Comments  
July 14, 2000  
Page 2

Ordinance requires approval of this Project by the City Planning Director based on whether feasible alternative locations do not exist outside the inner corridor [i.e., Mulholland right-of-way] and whether the facilities are designed constructed, and colored to minimize their visual intrusion on the parkway (NegDec IS p. 5.) Therefore, since a discussion of the alternatives is required by City ordinance, the preparation of an EIR which includes a discussion of alternatives is required by state law and the City environmental guidelines.

IV. An environmental impact report must be prepared by the Department of Water and Power. The NegDec/IA is not adequate for any purpose under the California Environmental Quality Act (Public Resources Code § 21000 *et seq.* ("CEQA").) The documents are based on the faulty premise that Dirt Mulholland is either an unused fire road not open to the public or an existing roadway upon which all manner of utility improvements may be inflicted without environmental effects. The switching from one usage to another is made only in order to minimize any potential significant effects. The existence of the two oil pipelines is mentioned only in passing in order to bolster the concept that the construction will have no effect but the documents do not even discuss the potential for an oil spill due to construction activities. (Note: During construction of the Harlan Lee subdivision, one of the oil pipelines was ruptured; also, an oil pipeline was ruptured during construction activities at Playa Vista ("the most thoroughly studied project in the history of the City of Los Angeles") on July 12, 2000.)

V. No pipeline west from Corbin Tank has ever been adequately analyzed under CEQA. The 1970s Corbin Tank Project encompassed the construction of a tank, a viewsite, landscaping of the site, and the potential installation of a pipeline in Mulholland Drive; there was been no approval of a "Mulholland Pipeline Project". The 1980 "Final Environmental Impact Report for the construction of Corbin Tank" ("Tank EIR") states that

Pipe installation will be scheduled simultaneously with Mulholland Drive improvement to minimize the environmental impact. (Tank EIR § 3.1, p. 11.)



Mulholland Pipeline Negative Declaration/Initial Study Comments  
July 14, 2000  
Page 3

The City has yet to approve any Dirt Mulholland Drive improvement and the Mulholland Scenic Parkway EIR did not include any discussion or analysis of improving or paving Dirt Mulholland; in a last minute compromise under threat of litigation, the City Council made a specific finding that any such proposal would be the subject of a future EIR.

In fact, the Mulholland Drive route appears to have been abandoned by DWP as early as when the Tradewoods Property (Tract 33238) had been acquired by the Santa Monica Mountains Conservancy which occurred between the time the Tank EIR was certified in 1981 and the Supplemental EIR for the Corbin Tank Relocation (Relocation SEIR) was certified in 1985. A pipeline route was presented but never analyzed in the SEIR and went westerly along Mulholland Drive only as far as Greenbriar Drive to hook up to the existing 24" pipeline that goes north on Greenbriar, where it was to cross west over private property on Tract 36504 until it reached the eastern end of the Gibraltar Tract (now 21000 Mulholland) at Casa Blanca Road (not Marcos Road). This route is no longer feasible because, due to seismic hazards identified by the State construction on the site cannot extend that far south and would be served from existing pipelines to the north.

The only portion of the pipeline route that has ever been approved to the west was that 1500-foot segment to Greenbriar Drive. As explained at a public hearing:

Hoye [of DWP]: The pipeline that we referred to in Mulholland will connect from Corbin Tank to an existing pipeline in Greenbriar [sic] at this location. So there will be about 1 2 mile of pipeline in Mulholland Drive, and then it will come out and connect into Greenbriar. From that point on, it will connect to the east side, the east to the west through existing tract developments, through streets that are in tracts. So there are—there is existing pipe at this location all the way across. There's existing pipe laid across this way. The new tract developments, the tentative plans show that [there will] be an alignment available here. So going from Corbin down into the tract getting over to existing pipelines to new pipelines... On the other side, the water will come [east] from Corbin Tank, through a short stretch of Mulholland, come down into existing tract and then take off in a new alignment, *primarily across streets in a future tract.*

[Susan] Nelson: Unapproved future tracts.



Mulholland Pipeline Negative Declaration/Initial Study Comments  
July 14, 2000  
Page 4

Hoye: *And the reason that we've taken the pipeline out of Mulholland is that this is now open space.* (Transcript, DWP Commission Corbin Tank [Relocation] Special Meeting, March 15, 1985, page 85 emphasis added.)

In 1992, the FEIR for the Woodland Hills Estates Subdivision (21000 Mulholland FEIR), reveals additional environmental concerns raised by DWP itself about a Mulholland Drive pipeline route:

According to the Department of Water and Power, because portions of Mulholland Drive have an extensive history of landslides and other geologic problems, the installation of the required 16-inch water main is undesirable along a stretch of Mulholland Drive easterly of the [21000 Mulholland] project site and would require cross-country construction work across a canyon ridge just west of Corbin Canyon. *However, to date no final alignment for the waterline has been selected and no specific information regarding the construction of the waterline is available.* (21000 Mulholland FEIR Response to Comment 19h, p. 96.)

The NegDec IS inappropriately relies on language in the Mulholland Scenic Parkway Ordinance Final EIR (1985) that water hydrants will be installed without stating that such installation will occur between Rosario and Encino Hills Drive only concurrent with development. (Summary of Findings, 13. Public Services, Fire Protection at p. S-10.) The portion of Dirt Mulholland along which the only approved development (21000 Mulholland Drive) is located is already served with fire hydrants (Sattilo to Rosario). If the fire hydrants are no longer part of the project, then the pipeline is no longer needed for fire protection. In any event, the 1985 Mulholland Scenic Parkway Ordinance EIR did not discuss the environmental impacts of installation of the fire hydrants and this pipeline as an independent project.

VI. The location of the pipeline, regulating station, and maintenance "holes"; estimated cost; alternatives; "already approved development" and alternatives must be identified and discussed.

A. Because the existing dirt roadbed already contains one or two oil pipelines<sup>1</sup> and is extremely narrow in width, potential significant impacts

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<sup>1</sup> One of the pipelines appears not to be located within the roadbed for the entire distance encompassed by this Project.



Mulholland Pipeline Negative Declaration/Initial Study Comments  
July 14, 2000  
Page 5

cannot be evaluated without complete disclosure of the relationship of the new water pipeline to the existing oil pipeline(s) because of the danger of rupture of the oil pipelines during construction and cross-contamination by future ruptures, all of which are potentially significant impacts.

B. The exact location of the regulating stations and the maintenance holes must be identified because their proposed sizes cannot fit within parts of the existing roadbed, alternative locations at the side of the roadbeds could damage sensitive plant communities, and these impermeable surfaces will result in erosion of the surrounding areas, all of which are potentially significant impacts.

C. WHHO is aware of only one development which has been approved: 21000 Mulholland Drive. Previously, DWP's policy was that this development would be required to pay for the entire pipeline because, in 1998 (post-1994 Northridge Earthquake), this proposed pipeline was withdrawn because it was "not a high priority at this time" according to the DWP General Manager David Freeman. With no real requirement for fire protection, a "not a high priority" improvement to the West Valley system, and only one approved development of 24 homes, the entire project smells like a costly ratepayer subsidy of a development which was approved on the premise that it would be served with water from Los Angeles County. If there are other developments contemplated to be served, then the project is most definitely "growth inducing", which is a potentially significant impact.

D. The cost of the project must be disclosed in order to (1) determine the amount of the ratepayer subsidy to the 21000 Mulholland developer and the feasibility of alternatives, including those identified by DWP in 1997.

VII. Alternatives Must Be Disclosed. The 1997 Mulholland Pipeline Report discusses the need for "a new, higher elevation replacement Topanga Tank. This alternative was neither identified nor discussed in any previous EI prepared for Corbin Tank or for any proposed tract development. Tank discussions were limited to Corbin and Nogales Tanks. Could this tank replacement serve as an alternative for this Project or is it an undisclosed future portion of this Project.

A. What improvements are needed in the 1337-foot system? The NegDec IA is exceptionally vague on this issue. According to the breakdown in the 1997 Mulholland Pipeline Report, \$2 million (1337 pipe improvements) + \$0.5 million (contribution from 21000 Mulholland Tract) + \$0.5 million



Mulholland Pipeline Negative Declaration/Initial Study Comments  
July 14, 2000  
Page 6

Topanga Tank = \$3 million (or less than the 1997 estimated \$3.8 million for the pipeline).

B. The use of the Super Scooper airplane has substantially expanded fire fighting options and efficiency in the mountains and must be discussed as an alternative.

VIII. Erosion of the Roadbed Must Be Adequately Discussed. The oil pipeline was replaced just a few years ago. The oil line's cement casing was exposed in a number of places during the 1997-1998 rains and is now barely below the surface in places. (See photo.) How much cover does DWP intend to be added to the oil pipeline or does DWP propose to have the oil pipeline reset to match the new water main? The 1997 Mulholland Pipeline Report talks about a 36-inch dirt cover. How does DWP plan to prevent/compensate for future erosion of the roadbed away from the slurry casing?

IX. No ratepayer or taxpayer funding should be used to construct this pipeline. Why and when did DWP change its policy that the pipeline would be paid for by future development? According to the "Water System Rules" and the approved mitigation measures for the 21000 Mulholland Tract, in 1992, DWP required that

[e]xtensive off-site and on-site supply and distribution mains will be required at Developer's expense" to supply water from the 1677 system (Corbin Tank). (21000 FEIR Summary Chart p. 30; see also Response to Comment 19f, p. 95; emphasis added.)

Previously, DWP had written to the developer stating that his share of the cost of the pipeline to 21000 Mulholland would be over \$1 million in the 1980s. (See 21000 FEIR Response to Comment 19g p. 95.) In 1997, we had a proposed cost of \$ 3.8 million and DWP was apparently settling for only \$500,000 from the developer. With only \$500,000 apparently collected from post-Corbin Tank 1667 system development, who pays the difference? DWP states in the Corbin Tank EIRs that it is not in the development business; DWP ratepayers aren't either. Let developers pay for their own infrastructure.

X. Conclusion. The above discussion of the proposed pipeline's environmental issues (with a more detailed discussion to follow by mail) demonstrates that the project proposed by DWP cannot be constructed with minimal environmental impact and no EIR. DWP must correct the Initial Study, issue a Notice of Preparation for an EIR and proceed in a lawful manner. Surely DWP has not



Mulholland Pipeline Negative Declaration/Initial Study Comments  
July 14, 2000  
Page 7

forgotten the lessons it was supposed to have learned through the three *Inyo County* lawsuits stemming from Mr. Mulholland's original vision?

Sincerely,

Rosemary Dealey Woodlock  
Attorney for Woodland Hills Homeowners Organization

cc: Council Member C. Miscikowski  
Santa Monica Mountains Conservancy



**ROSEMARY DEALEY WOODLOCK**  
**ATTORNEY AT LAW**  
**21015 MULHOLLAND DRIVE WOODLAND HILLS CA 91364**  
TELEPHONE (818) 703-7609  
FACSIMILE (818) 703-7692

July 28, 2000

Mr. Charles Holloway  
Environmental Affairs Officer  
Los Angeles Department of Water and Power  
111 N. Hope Street, Room 1044  
Los Angeles CA 90012

RE: MULHOLLAND PIPELINE I.S./NEG.DEC.

Dear Mr. Holloway:

These supplemental comments are written on behalf of the Woodland Hills Homeowners Organization ("WHHO") following my meeting with the technical representatives of your department. These comments include the photographs I took on July 12, 2000 at the request of the Department and an additional set will also be sent by mail.

Throughout our meeting, it was evident that the Department has not yet conducted the necessary preliminary geotechnical studies and, therefore, has not yet determined the feasibility of a pipeline route long the existing roadway.

WHHO is most seriously concerned about the estimation of the depth and width of the pipeline construction ditch as described in the IS/NegDec. The meeting revealed that the water pipeline must crisscross the oil pipelines at least four times between Marcos Road and Greenbriar Drive. This information raises serious questions:

1. How deep will the water pipeline need to be set? As Exhibit #1 demonstrates, the slurry covering the newly-set oil pipeline is now showing through in portions of Mulholland Drive; my recollection is that the oil pipeline ditch was between 5 and 8 feet deep. This situation indicates that the water pipeline may need to be set much deeper than estimates in the IS/NegDec since there appears to be little road surface left over the oil pipelines in places. In addition, DWP staff affirmed that the water pipeline will need to crisscross the oil pipelines in at least four places between Marcos and Greenbriar. How much and how deep will this excavation need to be?

Exhibit 2 shows that erosion around the existing oil pipeline regulating facilities



Additional Mulholland Pipeline Negative Declaration/Initial Study Comments  
July 28, 2000  
Page 2

and the new Bureau of Street Maintenance "curbing" (to control erosion) demonstrates the City's policy of non-maintenance over the past 20 years has taken its toll on the road. Street Maintenance scraped the roadbed for years which has substantially lowered it and increased erosion. Since the 1997 El Niño storms, Street Maintenance has been placing a layer of dirt which soon turns into dust on top. This "surfacing" washes away during the winter storms, requiring a repetition of the process, which has probably caused the exposure of the oil pipelines' slurry in places.

Approval of the pipeline project prior to thorough geotechnical review could result in very expensive, expanded project ultimately. The California Environmental Quality Act disclosure requirements demand that more engineering information be made available prior to any decision to approve the project.

2. Can the water pipeline be placed within the existing roadway safely? As demonstrated by an overlay of the 1998 State of California Seismic Hazard Zones Canoga Park Quadrangle Official Map prepared by the Division of Mines and Geology (Exhibit 3), the majority of the route is within "Zones of Required Investigation: Earthquake-Induced Landslides. The seriousness of this hazard is underscored by the comments made by James Slosson on behalf of Tarzana Property Owners Association on the general geological hazards in this portion of the Santa Monica Mountains. Most notably, the portion of the roadway which is not within the 200-foot right-of-way and which requires an easement across state lands (at the hairpin turn just east of the Santa Monica Mountains Conservancy gate east of Santa Maria Road) is no longer within the right-of-way because the right of way has fallen down the hillside. Can the pipeline be safely placed in this hazardous location already occupied by two oil pipelines without rebuilding the entire mountainside to protect against future seismic earthquakes? Is the project worth the cost of building it to this standard? Is the project worth building along Dirt Mulholland without this safety factor?

Given the location of the proposed pipeline within a "Zone of Required Investigation", this project requires complete geotechnical investigation, discussion, and assessment within the context of a full EIR.

3. Has the full extent of the needed water system improvements been disclosed? Based on the 1997 Mulholland Pipeline Report, the pipeline alone will not achieve water system improvements except for a limited number of houses in the Girard Tract and may not be entirely successful in that goal since





Additional Mulholland Pipeline Negative Declaration/Initial Study Comments  
July 28, 2000  
Page 3

the 1997 Report cited the need for an expansion of Topanga Tank. During my meeting with staff, a printout of the draw off Topanga Tank was shown, indicating that the tank is filled around 3:00 a.m. and the water level begins to drop about 4:00 a.m. If the tank enlargement was needed in 1997 as part of the Mulholland Pipeline, it will still be needed after the pipeline alone is constructed.

For this reason, CEQA's "apprehensive citizenry" is highly skeptical of this project. Without a thorough study of the geological hazards, additional future elements of the project and a realistic statement of the full costs of the project, WHHO questions whether DWP can afford to complete the "water system improvements" to the benefit of the entire West San Fernando Valley or whether the costs of the pipeline will escalate and cause the remainder of the system improvements to be abandoned to the sole benefit of the developer of 21000 Mulholland Drive.

While generalized "economic impacts" may be outside the scope of CEQA, a realistic discussion of the costs of this project (including the worst case scenario) and an assessment of whether DWP can afford to build it in light of other, more pressing needs is required by way of an EIR. Preparation of an EIR would also allow for a discussion of funding alternatives, including requiring the developer to pay for the pipeline by use of a Mello-Roos Assessment District or simply adding the cost of the pipeline to the cost of the houses.

4. Should this historic relic be allowed to be incrementally destroyed? Exhibit 4 consists of photographs taken from the center of the existing roadway. Virtually nowhere else in the City of Los Angeles has such sweeping vistas of what Los Angeles (and, indeed, all of Southern California) once was. It is supremely ironic that this historic relic of pre-Aqueduct Los Angeles should be located on the road named for the man who brought the needed water to Los Angeles. These pictures have been included in WHHO's comments in order to convey why the very existence of such a place within such a "world-class" city evokes such emotions from those who cherish its existence. Given the American experience of confronting our vast Western landscapes, this portion of the City is as much a shrine to our history as the Tokyo's Meiji Shrine, London's Hyde Park, Rome's Villa Borghese, and Paris' Tuilleries Garden. The differences between this underappreciated chaparral of Los Angeles and the lush cultivated parks of other cities are due to the fact that those cities were founded where ample water was available; Los Angeles made herself a city by bringing the water to us.



Additional Mulholland Pipeline Negative Declaration/ Initial Study Comments  
July 28, 2000  
Page 4

Constructing and maintaining this pipeline to DWP standards will result in incremental improvements to Dirt Mulholland to the detriment and ultimate destruction of this relic of our beginnings.

Sincerely,

Rosemary Dealey Woodlock  
Attorney for Woodland Hills Homeowners Organization

cc: Council Member C. Miscikowski  
Santa Monica Mountains Conservancy  
Mulholland Tomorrow  
Tarzana Property Owners Association  
Citizens Against Mulholland Pipeline  
Los Amigos de Caballero Cañon  
Sierra Club  
Fed. of Hillside and Canyon Associations

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

July 13, 2000

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

Mr. Holloway,

I write this letter to state my opposition to the Negative Declaration prepared for the Mulholland Water Pipeline Project. I will focus on the most crucial misrepresentation.

To state this project would not induce substantial growth in an area either directly or indirectly through projects in an undeveloped area .....is disingenuous (Section II, b).

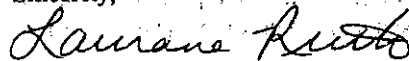
Developers need water to develop. The 21000 site on Dirt Mulholland is a "development in waiting". The proposed pipeline would conveniently service that location. Growth in the form of housing would occur.

Then the Domino Effect would begin. The many land parcels in private ownership in the area would fall. The developers would thrive on the agony of the natural resources of Dirt Mulholland --- open space, natural functions, wild life habitat..... All would be threatened.

The Wild Animals and The Man Animal's joy of living freedom on this little swatch of remaining land would be squeezed yet again.

Coldly, it would be but another meal on the plate of the insatiable appetite of the Destruction of LIFE'S WILD AND FREE DESTINATIONS.

Sincerely,



Laurane Ruth

Attn: Charles Holloway  
Re: Negative declaration Mulholland Water Pipeline Project  
From: Christine Stockham  
Phone: (818) 884-9059  
Pages: 3  
Date: 7/13/00

Dear Mr. Holloway,

As a resident of the Girard Tract in Woodland Hills, I am greatly concerned about the Mulholland Pipeline water project. At least 4-5 times per week, my husband and I enjoy walking along dirt Mulholland. The wild life population we encounter is fantastic. We see bobcats, coyotes, rabbits, snakes, beautiful song birds and impressive birds of prey. After reading your negative declaration for this project, I realised that you did not even consider these populations of animals. On page 27 section XVI, you state that this project does not even have the potential to degrade the quality of environment & wild life species. It is absolutely shocking to me that you believe with all that construction equipment and work going on for 12-16 months that the environment for the animals will not be disrupted. We have so little natural land left for animals in the Los Angeles area and it is saddening that we feel the need to dominate what little is left.

On pages 4 & 17 you state that this project is not considered to be growth inducing. However, I find it very suspicious that you do not once mention the housing development that will be constructed at 21000 Mulholland as a direct result of this pipeline. I am well aware that the developer EPAC has had their lawyers lobbying the DWP to have this pipeline installed at taxpayers expense. In light of this, the fact that you state that this pipeline is not growth inducing is a misrepresentation of the truth.

Page 21 section vi claims that this project does not pose potential hazards or barriers to pedestrians or bicyclists utilizing the parkway. When you mix bikers cycling at fast speeds and families walking with their young children ~~and~~ with huge earthmoving machines for over a year, common sense would dictate that there is a huge potential for injuries. This project could prove to be very unsafe for people who are enjoying and exercising in this scenic parkway.

It is my sincere belief that this project which will be paid for by taxpayers has more to do with providing water for EPAC and their proposed housing development and less to do with water pressure, fire and supplemental earthquake

water. It is apparent that EPAC has the right connections within the DWP and has made it worth someone's while to build this intrusive and definitely growth inducing pipeline.

In addition, the people who live in this area are just now beginning to find out about this proposed plan. Apparently you advertised this somewhere in the LA times, but many people do not receive the paper and most who do don't read it the whole way through. The reaction of my neighbors has been at first surprise followed by anger, anger because not is this happening but also that we were not sent some type of notification regarding this situation which will directly affect those of us who live on this street which intersects with dirt road Mulholland (Rosario Road). I am hopeful that you will reconsider your position that this pipeline will not negatively affect this area. At the very least, an extension should be granted so that the people who are just becoming aware of this situation have a chance to voice their concerns.

Sincerely,  
Christine Short

Mr. & Mrs. David W. Truslow

P.O. Box 91365

Woodland Hills

Calif 91365

Mr.S. David Freeman  
Mr.Charles Holloway

Department of Water & Power  
Los Angeles, California.

July 13th 2000

Dear Sirs:

We have been told of your intention of putting a water line from west to east on Mulholland as far as Corbin, closing use of Mulholland for use by householders on Santa Maria Road.

Santa Maria Road is a designated Private Road, being serviced and repaired by property owners there. Except for inconvenience and extended gasoline use we can manage without Mulholland for a time, but we must emphatically state the Santa Maria Road must NOT be used for ingress and egress by the public at large, OR workmen and materials being carried to Mulholland from other parts of the city and county by the Department of Water & Power.

This letter will be late to address this matter, but only yesterday were we informed of your plans.

We will be available to hear more of your plans at:

818- 340 7522

Box 62, woodland hills, California 91365



*Virginia Truslow*  
D.W. Truslow  
Virginia Truslow

House situated at: — 3150 Santa Maria Canyon Road  
Topanga, California

July 28, 2000

Mr. Charles Holloway  
Environmental Affairs officer  
Los Angeles Department of Water & Power  
111 N. Hope Street, Room 1044  
Los Angeles CA 90012

RE: Dirt Mulholland Pipeline

Dear Mr. Holloway:

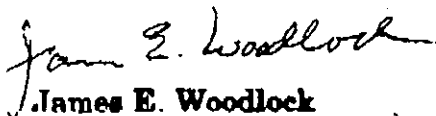
We received no formal notice of the proposed pipeline project and only learned of it because our daughter has been following the issue for several years.

Our home of 46 years was destroyed in the Northridge Earthquake. We expect to begin rebuilding shortly. We are concerned that the proposed pipeline construction has not taken into account the fact that Trinidad Road has no other access than by way of Dirt Mulholland. Although a portion of Marcos Road serves as a backdoor access to our lot, it does not extend down to Morro Drive except on maps. It and Casa Blanca Road are both "paper" streets. Using Santa Maria Road, even for a short while for us and for our workers and deliveries, would add over 25 miles to the trip, even if that roadbed could support the increased traffic.

We are strongly opposed to paving Mulholland Drive and are concerned that the pipeline project will result in paving in order to control future erosion around your facilities. Having watched the oil pipelines being reburied in the dirt portion of Mulholland Drive several years ago, we are also concerned about the risk of rupture during construction or in the event of an earthquake.

We request that the Department of Water & Power prepare an environmental impact report on this project before any decision is made.

Sincerely,



James E. Woodlock  
4033 Trinidad Road  
Woodland Hills CA 91364



LAW OFFICES  
WOLF, RIFKIN & SHAPIRO, LLP

11400 WEST OLYMPIC BOULEVARD  
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IN NEVADA

LAW OFFICES OF  
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August 11, 2000

MICHAEL WOLF\*  
DANIEL C. SHAPIRO  
ROY G. RIFKIN\*  
MICHAEL T. SCHULMAN\*  
LESLIE STEVEN MARKS  
MICHAEL W. RABKIN  
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DENISE M. PARGA

\*ALSO ADMITTED IN N.Y.

\*ALSO ADMITTED IN ARIZONA

\*ALSO ADMITTED IN NEVADA

\*A PROFESSIONAL CORPORATION

12879-001

Via Facsimile (213.367.3582) and U.S. Mail

Mr. Charles Holloway  
City of Los Angeles  
Department of Water & Power  
111 North Hope Street, Room 1044  
Los Angeles, California 90012

Re: Mulholland Water Pipeline Project (the "Project")

Dear Mr. Holloway:

We have been retained to represent Scott and Marty Brastow, Ellis and Deborah Stern, and Fair Hills Farms (collectively, the "Owners") who either reside or whose business is located on Santa Maria Road. The purpose of this letter is to identify two primary concerns of the Owners with respect to construction of the Project.

First, the Owners require access over Mulholland Drive. We make reference to the Initial Study/Negative Declaration dated June 12, 2000 in connection with Case No. WP-213-00 (the "Initial Study") which states the following:

"The segment of Mulholland Drive between approximately Santa Maria Road and Greenbriar Drive is a fire access road and is closed to through traffic. Due to the narrow road width, closure of the roadway segment in the immediate vicinity of active construction would be necessary."

Closure of Mulholland Drive is of great concern to the Owners because, like many other property owners in this area, they are equestrians and need access for a truck and trailer combination of approximately 10 feet in width and 48 feet in length in order to transport their horses. Access over Santa Maria Road to Topanga Canyon Road is inadequate for this purpose. Accordingly, the Owners are asking for assurance that adequate vehicular access will

LAW OFFICES

WOLF, RIFKIN & SHAPIRO, LLP

City of Los Angeles

Re: Mulholland Water Pipeline Project

August 8, 2000

Page 2

be available over dirt Mulholland during the construction of the Project. As we are sure you can appreciate, lack of access, especially during a fire, would be devastating to the Owners.

Second, although there appears to be no mention of this in the Initial Study, the Owners have heard rumors that the Department of Water & Power intends to use Santa Maria Road for either access or as a staging area during construction of the Project. In this regard, please be advised that Santa Maria Road is a private road and access for this public Project would, therefore, not be permitted.

Please contact me to discuss the issues raised in this letter so that problems can be avoided before construction of the Project commences.

Sincerely,

WOLF, RIFKIN & SHAPIRO, LLC

  
MINDY SHEPS

MS:plp

cc: Mr. and Ms. Scott Brastow

Mr. and Ms. Ellis Stern

Mr. and Ms. Maynard Brittan

**DEPARTMENT OF FISH AND GAME**

South Coast Region  
4949 Viewridge Avenue  
San Diego, California 92123  
(858) 467-4201  
FAX (858) 467-4239

December 18, 2000

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

Dear Mr. Holloway:

**Notice of Preparation of an Environmental Impact Report for  
Mulholland Water Pipeline, SCH # 2000111144, Los Angeles County**

The Department of Fish and Game (Department) appreciates this opportunity to comment on the above-referenced project, relative to impacts to biological resources. The proposed project consists of the installation and replacement of a total of 14,600 feet of water pipeline along Mulholland Drive in the community of Woodland Hills within the City of Los Angeles.

To enable Department staff to adequately review and comment on the proposed environmental document, we recommend the following information, be evaluated and included in the document:

1. A complete, recent assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species.
  - a. A thorough recent assessment of rare plants and rare natural communities, following the Department's May 1984 Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities (Attachment 1).
  - b. A complete recent assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Recent, focused, species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and U.S. Fish and Wildlife Service.

- c. Rare, threatened, and endangered species to be addressed should include all those which meet the California Environmental Quality Act (CEQA) definition (see CEQA Guidelines, § 15380). The EIR should address avoidance and mitigation measures to reduce significant direct and indirect adverse project impacts to sensitive species.
  - d. The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 324-3812 to obtain current information on any previously reported sensitive species and habitats, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. Also, any Significant Ecological Areas (SEAs) or environmentally Sensitive Habitat Area (ESHAs) that have been identified by the County of Los Angeles or any areas that are considered sensitive by the local jurisdiction that are located in or adjacent to the project area must be addressed.
2. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts.
- a. CEQA Guidelines, § 15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
  - b. Project impacts should also be analyzed relative to their effects on off-site habitats and populations. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems.
  - c. A cumulative effects analysis should be developed as described under CEQA Guidelines, § 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
  - d. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).
    1. Proposed project activities (including disturbances to vegetation) should take place outside of the breeding bird season (generally March 1- Aug 31) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Some species of birds such as raptors commence breeding prior to March 1 and this should be taken into consideration. If project activities cannot avoid the breeding bird season, active nests shall be avoided and provided with a minimum buffer as determined by a biological monitor

(the Department recommends a minimum 500 foot buffer for all active raptor nests.)

3. A range of alternatives should be analyzed to ensure that alternatives to the proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate.
  - a. Mitigation measures for project impacts to sensitive plants, animals, and habitats should emphasize evaluation and selection of alternatives which avoid or otherwise minimize project impacts. Compensation for unavoidable impacts through acquisition and protection of high quality habitat elsewhere should be addressed.
  - b. The Department considers Rare Natural Communities as threatened habitats having both regional and local significance. Thus, these communities should be fully avoided and otherwise protected from project-related impacts (Attachment 2).
  - c. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful. Please contact Ms. Mary Meyer, Plant Ecologist at (805) 640-8019 to discuss project related impacts to sensitive plant species and communities.
  - d. The Department requires all mitigation areas to be excluded from County or City required Fuel Modification Zones (FMZ). Acreage intended to satisfy either habitat buffer or mitigation requirements will not be considered to have value if included in a FMZ or planted with species consistent with FMZ requirements, rather than habitat restoration requirements.
4. A California Endangered Species Act (CESA) Permit must be obtained, if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to the proposed project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA

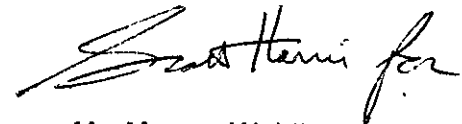
Mr. Charles C. Holloway  
December 18, 2000  
Page Four

permit. For these reasons, the following information is requested:

- a. Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.
  - b. A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.
5. The Department opposes the elimination of watercourses and/or their channelization or conversion to subsurface drains. All wetlands and watercourses, whether intermittent or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their value to on-site and off-site wildlife populations.
- a. The Department requires a streambed agreement, pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant prior to any direct or indirect impact (including preliminary geotechnical activities) of a lake or stream bed, bank or channel or associated riparian resources. The Department's issuance of a stream bed alteration agreement is considered a project that is subject to CEQA. To facilitate our issuance of the agreement, the Department as a responsible agency under CEQA may consider the local jurisdiction's (lead agency) document for the project. To minimize additional requirements by the Department under CEQA **the document should fully identify the potential impacts to any lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement.** Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. Please contact Ms. Betty Courtney, Environmental Specialists III, at (661) 263-8306 to discuss this further.

Thank you for this opportunity to provide comment. Questions regarding this letter and further coordination on these issues should be directed to Mr. Scott Harris, Associate Wildlife Biologist at (818) 360-8140.

Sincerely,



Ms. Morgan Wehtje  
Environmental Scientist IV

Attachments  
cc: see next page

Mr. Charles C. Holloway  
December 18, 2000  
Page Five

cc: Mr. Scott Harris  
Ms. Mary Meyer  
Ms. Ms. Betty Courtney  
Department of Fish and Game

State Clearinghouse  
Sacramento, California

## ATTACHMENT 1

State of California  
THE RESOURCES AGENCY  
Department of Fish and Game  
May 4, 1984

### GUIDELINES FOR ASSESSING THE EFFECTS OF PROPOSED DEVELOPMENTS ON RARE AND ENDANGERED PLANTS AND PLANT COMMUNITIES

The following recommendations are intended to help those who prepare and review environmental documents determine when a botanical survey is needed, who should be considered qualified to conduct such surveys, how field surveys should be conducted and what information should be contained in the survey report.

1. Botanical surveys that are conducted to determine the environmental effects of a proposed development should be directed to all rare and endangered plants and plant communities. Rare and endangered plants are not necessarily limited to those species which have been "listed" by state and federal agencies but should include any species that, based on all available data, can be shown to be rare and/or endangered under the following definitions.

A species, subspecies or variety of plant is "endangered" when the prospects of its survival and reproduction are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition or disease. A plant is "rare" when, although not presently threatened with extinction, the species, subspecies or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens.

Rare plant communities are those communities that are of highly limited distribution. These communities may or may not contain rare or endangered species. The most current version of the California Natural Diversity Data Base's Outline of Terrestrial Communities in California may be used as a guide to the names of communities.

2. It is appropriate to conduct a botanical field survey to determine if, or the extent that, rare plants will be affected by a proposed project when:
  - a. Based on an initial biological assessment, it appears that the project may damage potential rare plant habitat;
  - b. Rare plants have historically been identified on the project site, but adequate information of impact assessment is lacking; or
  - c. No initial biological assessment has been conducted and it is unknown whether or not rare plants or their habitat exist on the site.
3. Botanical consultants should be selected on the basis of possession of the following qualifications (in order of importance):
  - a. Experience as a botanical field investigator with experience in field sampling design and field methods;
  - b. Taxonomic experience and a knowledge of plant ecology;
  - c. Familiarity with the plants of the area, including rare species; and
  - d. Familiarity with the appropriate state and federal statutes related to rare plants and plant collecting.
4. Field surveys should be conducted in a manner that will locate any rare or endangered species that may be present. Specifically, rare or endangered plant surveys should be:
  - a. Conducted at the proper time of year when rare or endangered species are both "evident" and identifiable. Field surveys should be scheduled (1) to coincide with known flowering periods, and/or (2) during periods of



phenological development that are necessary to identify the plant species of concern.

- b. Floristic in nature. "Predictive surveys" (which predict the occurrence of rare species based on the occurrence of habitat or other physical features rather than actual field inspection) should be reserved for ecological studies, not for impact assessment. Every species noted in the field should be identified to the extent necessary to determine whether it is rare or endangered.
  - c. Conducted in a manner that is consistent with conservation ethics. Collection of rare or suspected rare species (voucher specimens) should be made only when such actions would not jeopardize the continued existence of the population and in accordance with applicable state and federal permit regulations. Voucher specimens should be deposited at recognized public herbaria for future reference. Photography should be used to document plant identification and habitat whenever possible, but especially when the population cannot withstand collection of voucher specimens.
  - d. Conducted using systematic field techniques in all habitats of the site to ensure a reasonably thorough coverage of potential impact areas.
  - e. Well documented. When a rare or endangered plant (or rare plant community) is located, a California Native Species (or Community) Field Survey Form or equivalent written form should be completed and submitted to the Natural Diversity Data Base.
5. Reports of botanical field surveys should be included in or with environmental assessments, negative declarations, EIR's and EIS's, should contain the following information:
- a. Project description, including a detailed map of the project location and study area.
  - b. A written description of biological setting referencing the community nomenclature used and a vegetation map.
  - c. Detailed description of survey methodology.
  - d. Dates of field surveys.
  - e. Results of survey (including detailed maps).
  - f. An assessment of potential impacts.
  - g. Discussion of the importance of rare plant populations with consideration of nearby populations and total species distribution.
  - h. Recommended mitigation measures to reduce or avoid impacts.
  - i. List of all species identified.
  - j. Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms.
  - k. Name of field investigator(s).
  - l. References cited, persons contacted, herbaria visited, and disposition of voucher specimens.

ATTACHMENT 2

Sensitivity of Top Priority Rare Natural Communities in Southern California\*

\*Sensitivity rankings are determined by the Department of Fish and Game, California Natural Diversity Data Base and based on either number of known occurrences (locations) and/or amount of habitat remaining (acreage). The three rankings used for these top priority rare natural communities are as follows:

- S1.- Less than 6 known locations and/or on less than 2,000 acres of habitat remaining
- S2.- Occurs in 6-20 known locations and/or 2,000-10,000 acres of habitat remaining
- S3.- Occurs in 21-100 known locations and/or 10,000-50,000 acres of habitat remaining

The number to the right of the decimal point after the ranking refers to the degree of threat posed to that natural community regardless of the ranking. For example:

- S1.1 = very threatened
- S2.2 = threatened
- S3.3 = no current threats known

Sensitivity Rankings (February 1992)

<u>Rank</u>	<u>Community Name</u>
S1.1	Mojave Riparian Forest
	Southern Dune Scrub
	Southern Coastal Bluff Scrub
	Mesquite Bosque
	Maritime Succulent Scrub
	Elephant Tree Woodland
	Riversidean Alluvial Fan Sage Scrub
	Crucifixion Thorn Woodland
	Southern Maritime Chaparral
	Allthorn Woodland
	Valley Needlegrass Grassland
	Arizonan Woodland
	Great Basin Grassland
	Southern California Walnut Forest
	Mojave Desert Grassland
	Mainland Cherry Forest
	Pebble Plains
	Southern Bishop Pine Forest
	Southern Sedge Bog
	Torrey Pine Forest
	Cismontane Alkali Marsh
	Desert Mountain White Fir Forest

Sensitivity Rankings (Cont.)

Community Name

- S1.2 Southern Foredunes  
Mono Pumice Flat  
Southern Interior Basalt Fl. Vernal Pool
- S2.1 Venturan Coastal Sage Scrub  
Diegan Coastal Sage Scrub  
Riversidean Upland Coastal Sage  
Scrub  
Riversidean Desert Sage Scrub  
Sagebrush Steppe  
Desert Sink Scrub  
Mafic Southern Mixed Chaparral  
San Diego Mesa Hardpan Vernal P.  
San Diego Mesa Claypan Vernal P.  
Alkali Meadow  
Southern Coastal Salt Marsh  
Coastal Brackish Marsh  
Transmontane Alkali Marsh
- Coastal and Valley Freshwater Marsh  
S. Arroya Willow Riparian Forest  
Southern Willow Scrub  
Modoc-G.Bas. Cottonwood Willow Rip.  
Modoc-Great Basin Riparian Scrub  
Mojave Desert Wash Scrub  
Engelmann Oak Woodland  
Open Engelmann Oak Woodland  
Closed Engelmann Oak Woodland  
Island Oak Woodland  
California Walnut Woodland  
Island Ironwood Forest  
Island Cherry Forest  
S. Interior Cypress Forest  
Bigcone Spruce-Canyon Oak Forest
- S2.2 Active Coastal Dunes  
Active Desert Dunes  
Stab. and Part. Stab. Desert Dunes  
Stab. and Part. Stab. Desert Sandfield  
Mojave Mixed Steppe  
Transmontane Freshwater Marsh  
Coulter Pine Forest  
S. California Fellfield  
White Mountains Fellfield
- S2.3 Bristlecone Pine Forest  
Limber Pine Forest

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



December 29, 2000

IGR/CEQA cs/001175  
NOP  
City of Los Angeles  
West San Fernando Valley  
Mulholland Dr. east of Topanga Cyn. Blvd.  
Mulholland Pipeline Project  
Vic. LA-27-11.06  
SCH# 2000111144

RECEIVED  
JAN 17 2001  
CES

Mr. Charles C. Holloway  
City of Los Angeles  
Department of Water and Power  
111 N. Hope Street, Rm. 1044  
Los Angeles, CA 90012

Dear Mr. Holloway:

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

- 1) We recommend that construction related truck trips be limited to off-peak commute periods. Transport of oversize or over-weight vehicles on State highways will need a Caltrans Transportation Permit.
- 2) We would appreciate advance copies of the DEIR and traffic study to facilitate internal Caltrans review. Copies should be sent to the undersigned :

c/o Stephen Buswell, IGR/CEQA Program Manager  
Caltrans District 7, Office of Advance Planning  
120 South Spring Street  
Los Angeles, CA 90012

If you have any questions regarding our comments, refer to Caltrans IGR/CEQA Record # cs/001175, and please do not hesitate to contact me at (213) 897-4429.

Sincerely,

*Carl Stigzi*

*for* STEPHEN BUSWELL  
IGR/CEQA Program Manager

cc: Mr. Scott Morgan, State Clearinghouse

STATE OF CALIFORNIA—THE RESOURCES AGENCY

GRAY DAVIS, Governor

**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207



V/m  
12/26  
a 0308

December 26, 2000

Mr. Charles Holloway  
Supervisor of Environmental Assessment  
City of Los Angeles Department of Water and Power  
111 N. Hope Street, Room 1044  
Los Angeles, California 90012

**Mulholland Water Pipeline  
Notice of Preparation Comments**

Dear Mr. Holloway:

The Santa Monica Mountains Conservancy respectfully submits the following comments on the above referenced Notice of Preparation of a Draft Environmental Impact Report. The Conservancy requests an extension of the comment period to January 29, 2000. Pending the Department's decision on this requested extension, attached and by reference, the Conservancy's initial comments shall consist of our July 26, 2000 letter submitted on the prior Draft Negative Declaration and Initial Study. Please address any questions to my attention at (310) 589-3200 ext. 128.

Sincerely,

PAUL EDELMAN  
Chief of Natural Resources and Planning

**SANTA MONICA MOUNTAINS CONSERVANCY**

SOOKY GOLDMAN NATURE CENTER  
2600 FRANKLIN CANYON DRIVE  
BEVERLY HILLS, CALIFORNIA 90210  
PHONE (310) 858-7272  
FAX (310) 858-7212



July 26, 2000

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

**Mulholland Water Pipeline Project  
Draft Negative Declaration Comments  
SCH No. 2000061066**

Dear Mr. Holloway:

The Santa Monica Mountains Conservancy (Conservancy) appreciates the Department of Water and Power's willingness to extend the comment period on the Draft Negative Declaration to install a new pipeline and upgrade an existing pipeline in the western portion of dirt Mulholland Drive. The Conservancy manages the approximately 1,100-acre Mulholland Gateway Park which abuts every foot of the proposed pipeline improvements between the Corbin Tank and Cachalote Street. The accumulated parkland along dirt Mulholland Drive represents a significant public investment and public resource of statewide significance that must not be despoiled by unnecessary public works projects. The Conservancy opposes the project and provides the following comments on the environmental document.

The Negative Declaration provides just a skeletal rationale of the need for the project and absolutely no discussion of alternative projects to provide similar water system improvements. The Department's 1997 Mulholland Pipeline Report examined a range of alternatives. The subject Negative Declaration is deficient for not integrating the contents of that report into the current environmental analysis.

For example, this 1997 report addresses the need for a new higher elevation replacement Topanga Tank. The Negative Declaration does not reference any such need. In general the proposed project provides a stand-alone set of improvements that do not allude to any remaining deficiencies or needs for future supplemental projects. In analyzing the proposed project, the public has no guarantees that future related projects will not be proposed by the Department. The Negative Declaration is deficient for not adequately describing whether or not the proposed project has any reasonable potential to just be a first step in a larger project. If any other related projects are contemplated by the Department they must be disclosed in the current California Environmental Quality Act document.

Mr. Charles Holloway  
Department of Water and Power  
Mulholland Water Pipeline Project  
July 26, 2000  
Page 2

By drawing inferences from the 1997 Mulholland Pipeline Report and the Woodland Hills Estates (21000 Mulholland) EIRs, it is safe to say that the proposed project will cost approximately \$2.5 million. The project description is deficient for not addressing other, less environmentally damaging, means to achieve the desired objectives within this budget range. The Negative Declaration is also deficient in not stating how the project would be funded. What are the direct required contributions of benefitting landowners, if any? Insufficient information has been provided to the decision-makers. A more complete environmental document must be recirculated.

The recirculated environmental document must consider alternative projects. One such alternative may be to acquire the 21000 Mulholland project site and locate a tank at the upper (southern) end of the existing disturbed bowl. The base of such an above ground tank would be at an approximate elevation of 1,260 feet. Elimination of this approved development eliminates much of the direct need for the proposed extension from the Corbin Tank, and it would put a tank much closer to the "Corbin Tank Supplemental to Kittridge Tank Service Area" as shown in Figure 5 (Emergency Service Area) of the Negative Declaration.

The Negative Declaration is also deficient in stating that many of the larger water system issues relevant to the proposed project were addressed in the Department's 1981 FEIR and 1985 Supplemental EIR for the Corbin Water Tank and Corbin Tank Relocation projects, respectively. It is our understanding that these documents only analyzed direct pipeline impacts 1500-feet west of the Corbin Tank to Greenbriar Drive.

Most importantly, the Initial Study is deficient in concluding that the project would not induce substantial growth in an area either directly or indirectly (II.b Population and Housing ) and that the project does not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals (XVI.b Mandatory Findings of Significance). It is critical for any such pipeline extension environmental document to disclose how the subject project directly benefits the Woodland Hills Estates (21000 Mulholland) and Mulholland Hills Associates (Avatar) VTT No. 50784 projects. How are these projects dependent on the proposed project?

In light of all the serious deficiencies expressed in this letter, this agency concludes that the preparation of a focused EIR is critical to address the project's growth-inducement potential.

Mr. Charles Holloway  
Department of Water and Power  
Mulholland Water Pipeline Project  
July 26, 2000  
Page 3

The Conservancy opposes both the construction of any unnecessary infrastructure within, and through, Mulholland Gateway Park and any projects that would induce growth that is detrimental to existing public resources. The Negative Declaration states that permission from the Conservancy may be needed for construction purposes on Conservancy property. Because of the project's potential significant adverse effects that are outlined in this letter, this body hereby officially notifies the Department that no permission shall be granted.

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

Sincerely

*Elizabeth A. Cheadle*

ELIZABETH A. CHEADLE  
Chairperson



# EQUILON

PIPELINE COMPANY LLC

P. O. Box 6249  
20945 South Wilmington Avenue (90810)  
Carson, CA 90749-6249

Wednesday, February 23,  
2000

CITY OF LOS ANGELES, DEPARTMENT OF WATER AND POWER  
Attn: Gayle Glauz  
P.O. Box 51111  
Los Angeles, Calif. 90051-0100

Dear Ms. Glauz,

PROPOSED WATER DISTRIBUTION MAIN IN MULHOLLAND DRIVE  
VENTURA CRUDE LINE  
REC 3565  
THOMAS BROS. PAGE 560 GRID B6-E6

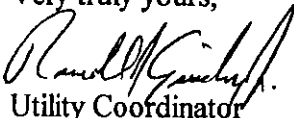
Please refer to your letter dated 2/18/2000 concerning PROPOSED WATER DISTRIBUTION MAIN IN MULHOLLAND DRIVE. Equilon Pipeline Company LLC, on behalf of Shell Oil Products Company and Texaco Trading Transportation, operates and maintains ONE ACTIVE pipeline in the area of the above referenced project. At this time, we can not determine whether a conflict exist with the information that you have provided. In order to determine if a conflict exists prior to construction, we require a complete set of your construction plans.

To aid in your design, we have enclosed Drawings Y-1669-05, Y-1669-06, Y-1669-07, Y-1669-08, Y-1669-08B, Y-1669-08C, Y-1669-09, Y-1669-10 and Y-1669-11.

Further to your correspondence, Equilon uses the general guidelines of the industry with regard to clearance and location of new utilities. The general guideline requires a minimum of 12" between utilities. We would also prefer that new utilities be located under existing ones.

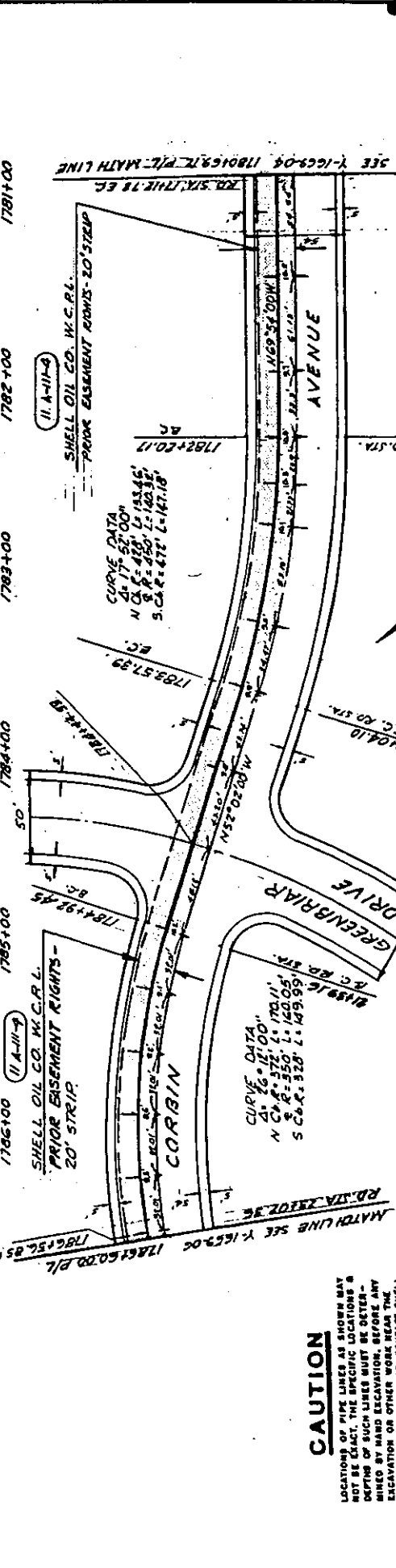
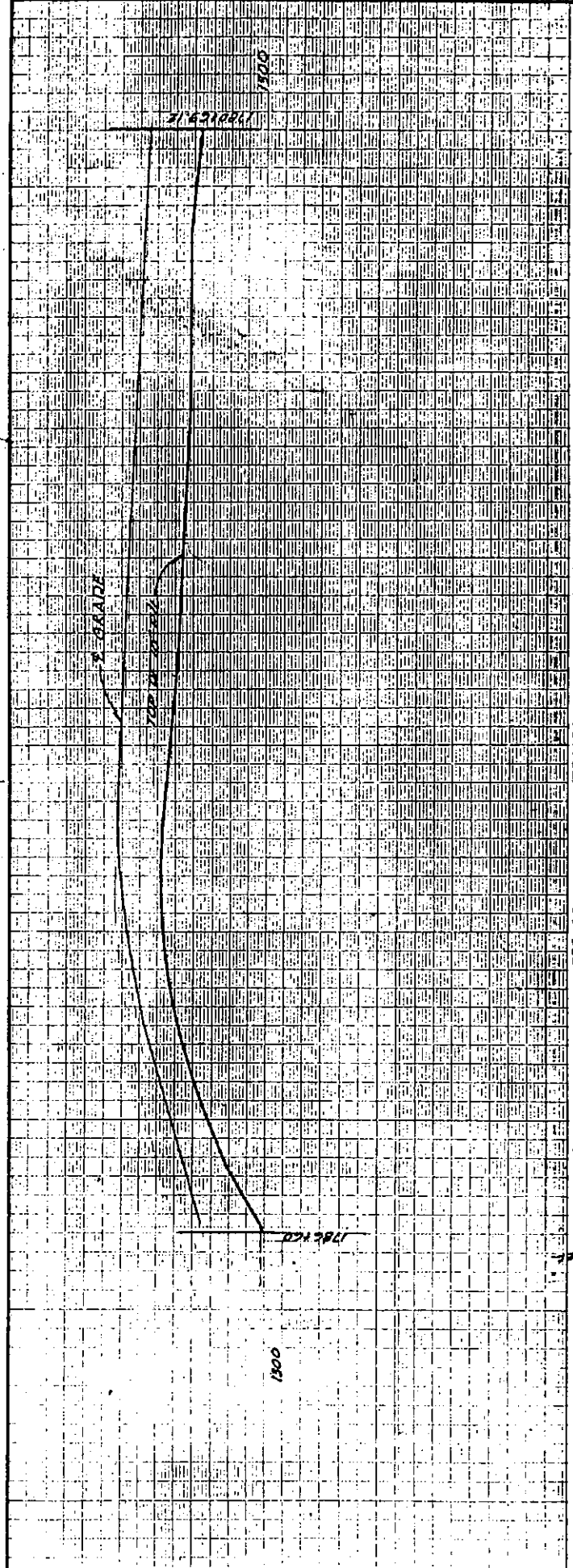
If you require additional information, please call me at (310) 816-2063.

Very truly yours,

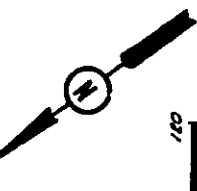


Utility Coordinator

Enclosures



SHELL OIL COMPANY	T. & S. - LOS ANGELES WEST COAST PIPE LINES	ENGINEERING DEPT.
<b>VENTURA WILMINGTON</b>		
<b>10" CRUDE</b>		
<b>CITY OF LOS ANGELES</b>		
DATE	3/12/73	SCALE HOR = 1" = 40'
DRAWN BY	TJM	VER = 1" = 8'
CHECKED BY		
APPROVED BY		Y-1669-05

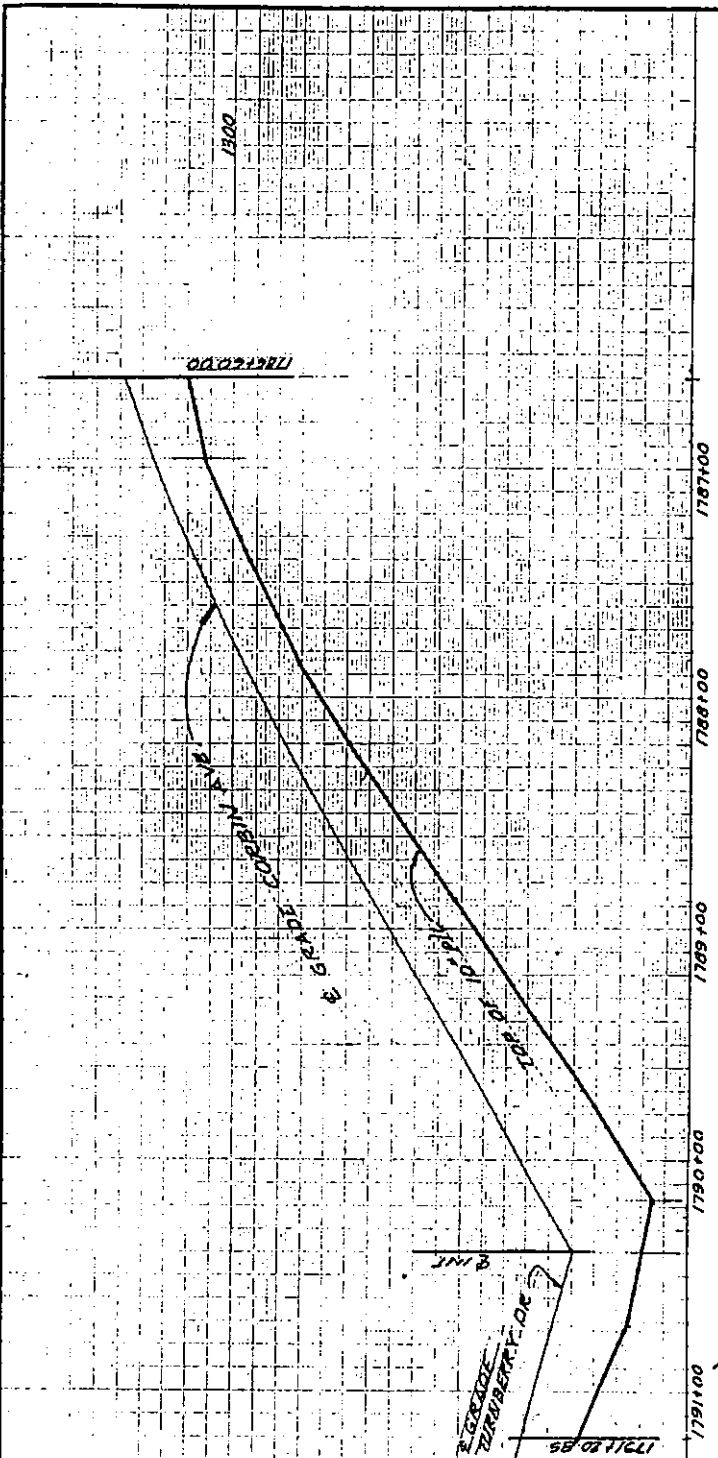


\*NOTE - USE GRAPHIC SCALE ON REVISIONS.

**CAUTION**

LOCATIONS OF PIPE LINES AS SHOWN MAY NOT BE EXACT. THE SPECIFIC LOCATIONS & DEPTHS OF SUCH LINES MUST BE OBTAINED BY HAND EXCAVATION. BEAR THE EXCAVATION WORK ON THIS MAP, CONTACT SHELL OIL COMPANY, 1008 W. 6th ST., LOS ANGELES, CA, 90084. PH. AREA CODE 213 482-8111 OR 482-9182. (AREA CODE 415) 228-4285.

STATION	TO STATION	SIZE I.D.	GRADE	TYPE OF COATING	INSTALLER	W.O.
1781+95.01	1786+50.00	10" X 10.75	X 1.50	X 1.50	8/75	9795E
1786+50.00	1789+00.00	10" X 10.75	X 1.50	X 1.50	8/75	9795E



SHELL OIL COMPANY WEST COAST PIPE LINES	ENGINEERING DEPT.	VENTURA-WILMINGTON 10" CRUDE
CITY OF LOS ANGELES		
DATE: 3/14/73	SCALE: HORIZ. = 1" = 40'	DRAWN BY: TVM CHECKED BY: APPROVED BY:
DRAWN BY: TVM		
CHECKED BY:		
APPROVED BY:		Y-1669-06

**CAUTION**

LOCATIONS OF PIPE LINES AS SHOWN MAY BE DIFFERENT FROM ACTUAL LOCATIONS & DEPTHS OF SUCH LINES MUST BE DETERMINED BY HAND EXCAVATION BEFORE ANY EXCAVATION OR OTHER WORK NEAR THE LINES SHOWN ON THIS MAP. CONTACT SHELL OIL COMPANY, 1008 W. 6th ST. LOS ANGELES, CA, 90054 PH. AREA CODE 213 482-8191 OR 482-8192. (AREA CODE 415) 228-4295.

CURVE DATA  
S C = 31.45', L = 189.45'  
E R = 350', L = 177.26'

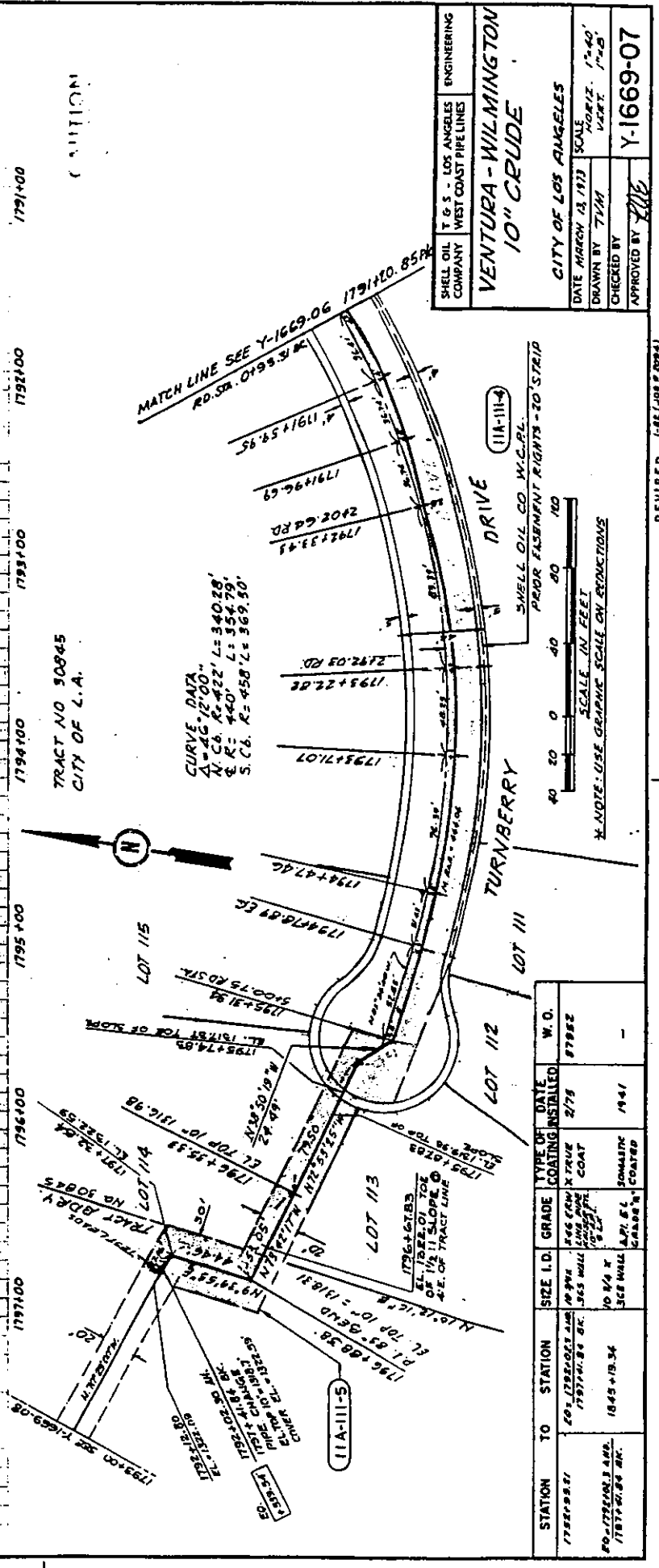
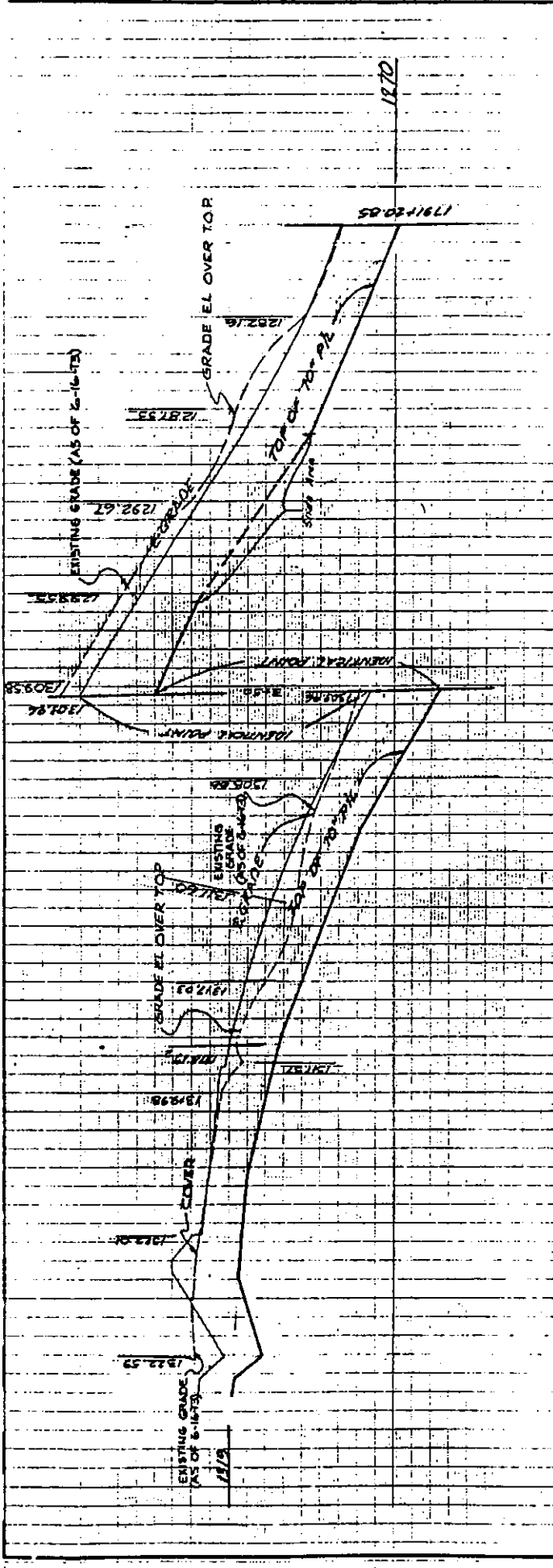
CURVE DATA  
A = 52° 55' 54"  
N Ch. P. = 288', L = 215.30'  
E R = 320', L = 295.63



STATION TO	STATION	SIZE I.D.	GRADE	TYPE OF COATING	DATE INSTALLED	W. O.
1752+95.21	EQ-1792+02.81	10" X 1"	X 66.28%	X TRUV	2/73	3755E
	1791+10.00	3.65" I.D.	ENCLOSURE	COAT		
			18" DIA.			
			5 C.C.X			

1270

REVISED



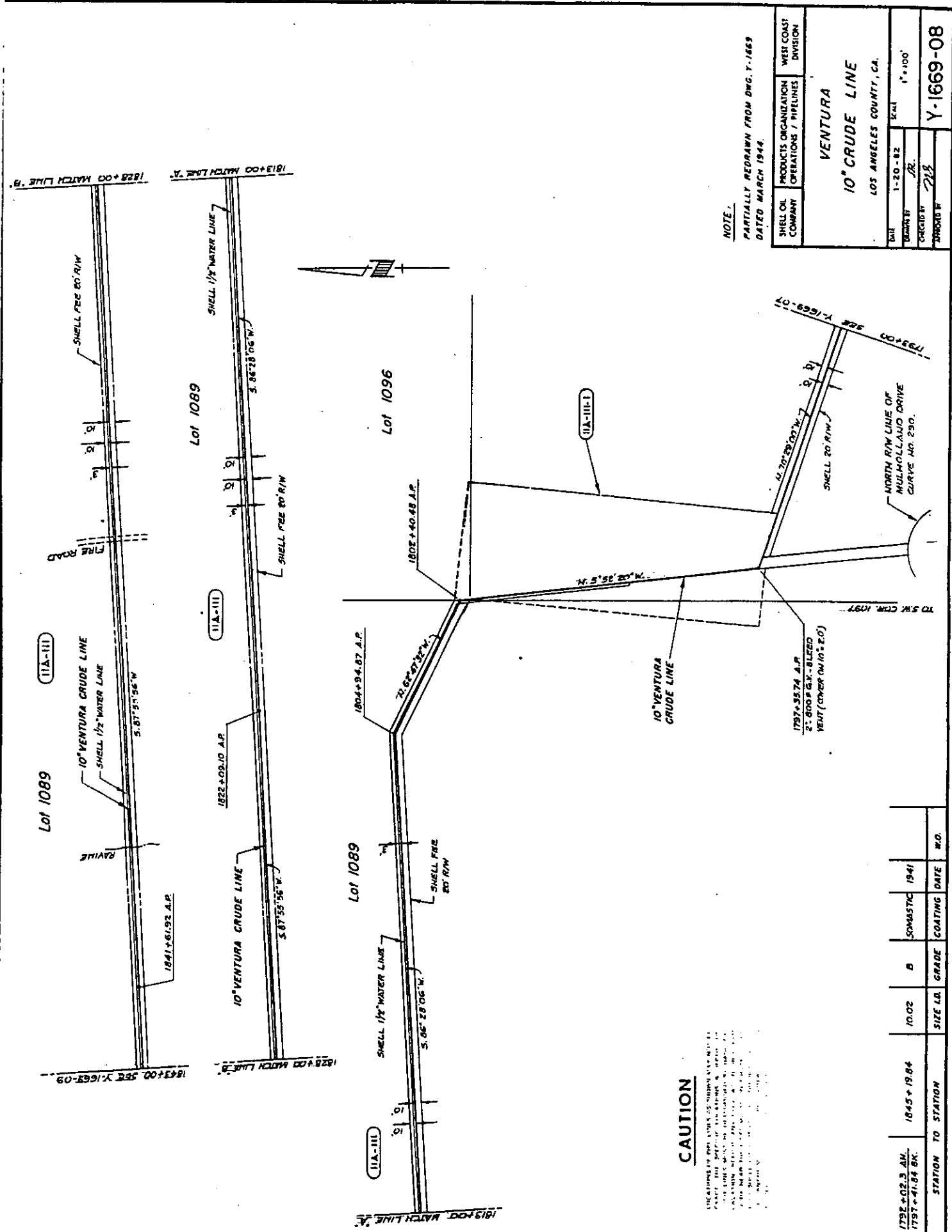
CURVE DATA  
 $\Delta = 46^{\circ}12'00''$   
 $N.C.B. = 422'$   $L = 340.28'$   
 $S.C.B. = 440'$   $L = 354.79'$   
 $S.C.C. = 458'$   $L = 369.50'$

STATION	TO STATION	SIZE I.D.	GRADE	COATING INSTALLED	TYPE OF DATE	W. O.
1792+88.51	602 (1792+88.51) AND 1793+41.88 BK.	18" DIA	4" X 1/2" SLOPE	TRUNK LINE	2/75	1982
602 (1792+88.51) AND 1793+41.88 BK.	1845 + 19.54	18" DIA	4" X 1/2" SLOPE	TRUNK LINE	1941	-

ENGINEERING	T G S - LOS ANGELES WEST COAST PIPE LINES
SHELL OIL COMPANY	
VENTURA - WILMINGTON 10" CRUDE	
CITY OF LOS ANGELES	DATE MARCH 13, 1973
SCALE HORIZ. 1"=40' VERT. 1"=8'	CHECKED BY TGM
APPROVED BY [Signature]	Y-1669-07

REVISED 1-82 (JOB P. 2094)





NOTE:  
PARTIALLY REDRAWN FROM DWG. Y-1669  
DATED MARCH 1944.

SHELL OIL COMPANY	PRODUCTS ORGANIZATION OPERATIONS / PIPELINES	WEST COAST DIVISION
<b>VENTURA</b>		
<b>10" CRUDE LINE</b>		
LOS ANGELES COUNTY, CA.		
DATE	SCALE	
1-20-82	1" = 100'	
DRAWN BY	CHECKED BY	APPROVED BY
DR.	DR.	DR.
<b>Y-1669-08</b>		

**CAUTION**

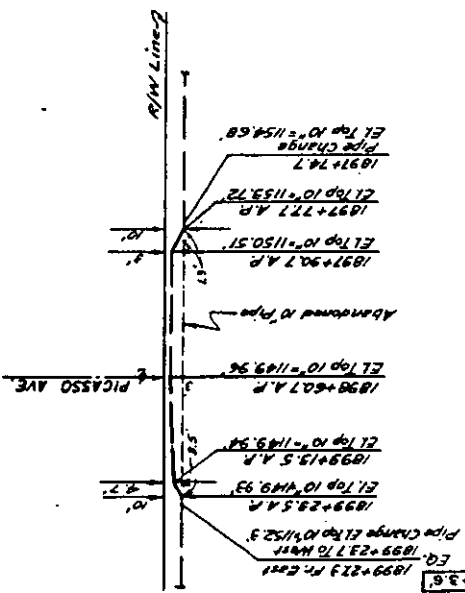
LOCATING OF PIPE STAKES AS SHOWN MAY NOT BE EXACT. THE DEPTH OF THE STAKES IS APPROX. 12 INCHES. THE STAKES ARE TO BE PLACED AT THE CENTER OF THE PIPE. THE STAKES ARE TO BE PLACED AT THE CENTER OF THE PIPE. THE STAKES ARE TO BE PLACED AT THE CENTER OF THE PIPE.

STATION TO STATION	SIZE I.D.	GRADE	COATING	DATE	N.O.
1792+02.3 A.K. 1797+41.84 B.K.	10.02	B	SOMASTIC	1941	

REVISED SHEET 1-82 FOR DWG. Y-1669-08

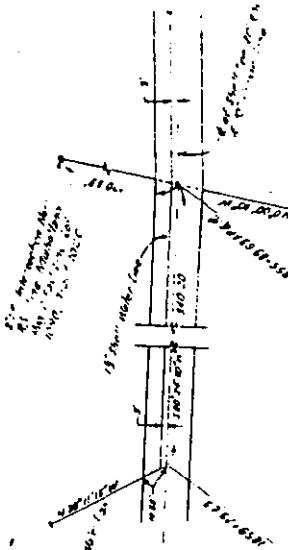
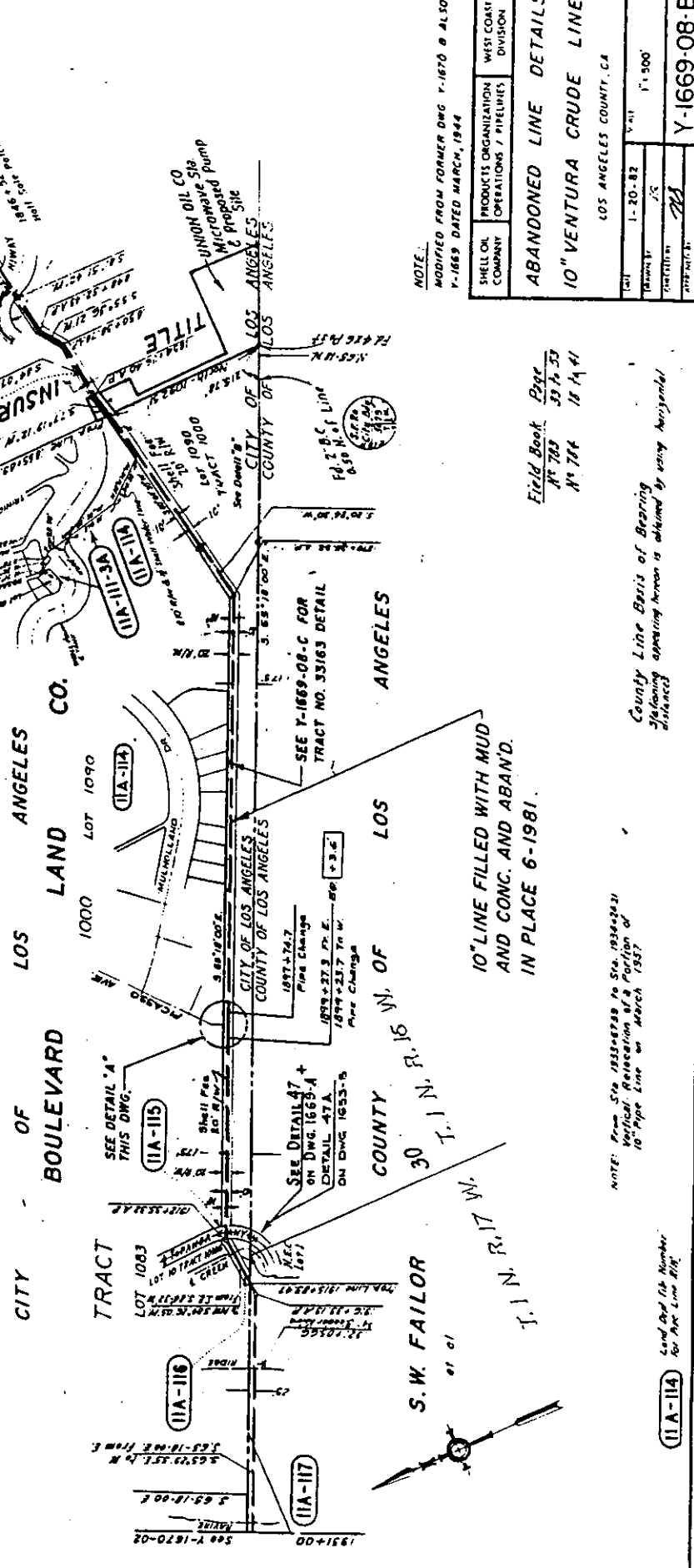
**CAUTION**

LOCATIONS OF PIPE LINES AS SHOWN MAY NOT BE EXACT. THE SETTING INDICATES A DEPTH OF 30 INCHES UNLESS OTHERWISE NOTED. EXERCISE EXTREME CAUTION BEFORE ANY EXCAVATION OR OTHER WORK NEAR THE LINES SHOWN ON THIS MAP. CONSULT THE LOCAL OIL COMPANY FOR THE LOCATION OF ALL OTHER LINES. THIS MAP IS NOT TO BE USED FOR ANY OTHER PURPOSES WITHOUT THE WRITTEN CONSENT OF THE ENGINEER.



NOTE: From Sta 1897+74.7 TO E.C. 1899+22.3 THE LINE WAS RELOCATED & NEW 10" PIPE INSTALLED ON 7-28-65.

**DETAIL "A"**  
SCALE 1:50



**DETAIL "B"**  
SCALE 1:40

NOTE:  
MODIFIED FROM FORMER DWG Y-1670-B ALSO  
Y-1669-DATED MARCH, 1944

SHELL OIL COMPANY	PRODUCTS ORGANIZATION OPERATIONS / PIPELINES	WEST COAST DIVISION
	ABANDONED LINE DETAILS	
10" VENTURA CRUDE LINE		
LOS ANGELES COUNTY, CA		
DATE	1-20-82	SCALE 1"=500'
DRAWN BY	J/S	
CHECKED BY	AB	
PROJECT NO.	Y-1669-08-B	

Field Book Page  
No. 768 30-14-59  
No. 764 18-14-41

County Line Basis of Bearing  
Following apparent horizon is obtained by using horizontal distances

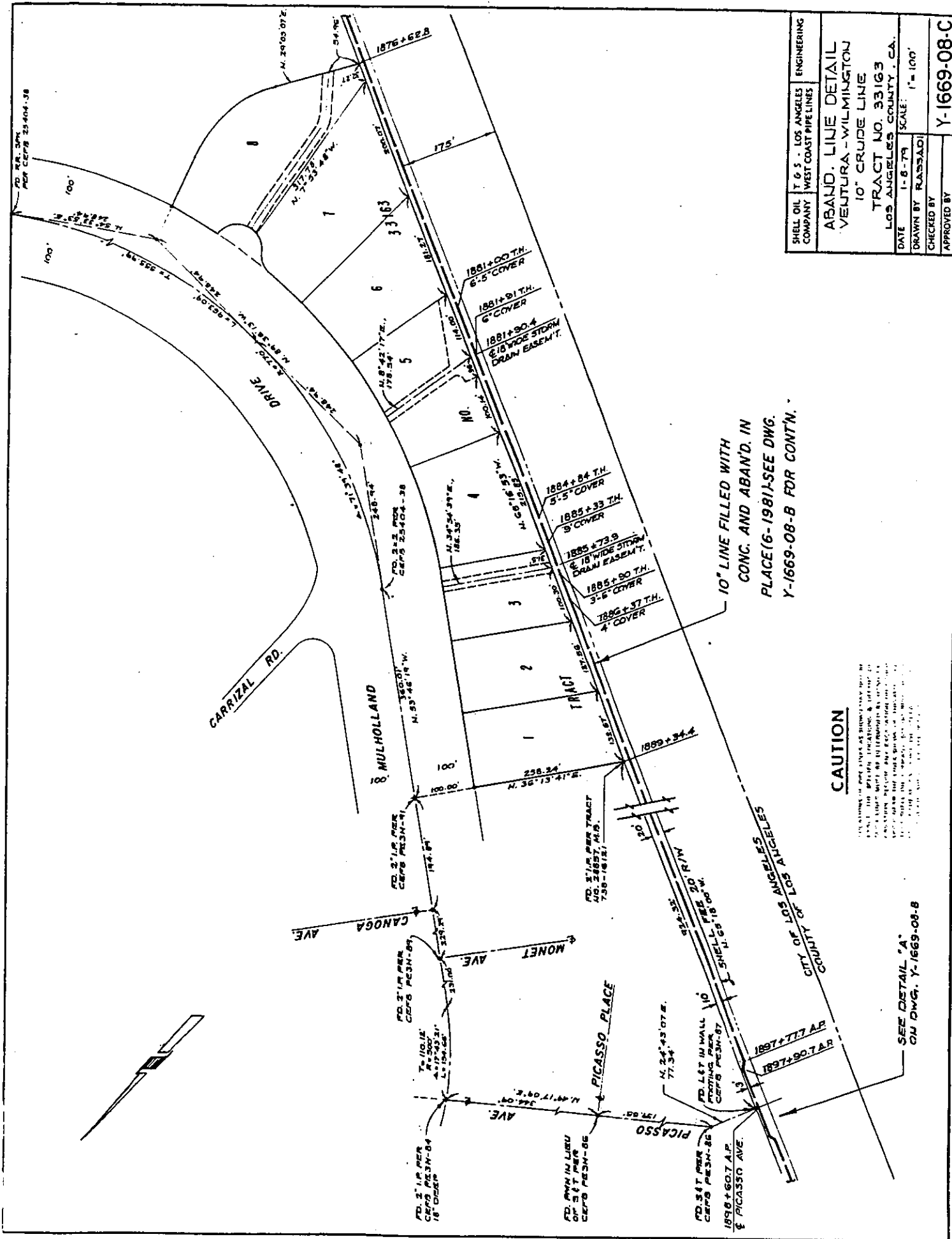
NOTE: From Sta 1855+67.89 to Sta. 1934+24.31 Vertical Relocation of a Portion of 10" Pipe Line in March 1957

Land and E.C. Number for R/W Line R/W

(IIA-114)







SHELL OIL COMPANY	WEST COAST PIPE LINES	ENGINEERING
ABAND. LINE DETAIL VENTURA - WILMINGTON 10" CRUDE LINE TRACT NO. 33163 LOS ANGELES COUNTY, CA.		
DATE	1-8-79	SCALE: 1" = 100'
DRAWN BY	RASSALDI	
CHECKED BY		
APPROVED BY		
		FORMER Y-1670-B

10" LINE FILLED WITH  
 CONC. AND ABAND'D. IN  
 PLACE (6-1981) - SEE DWG.  
 Y-1669-08-B FOR CONT'N.

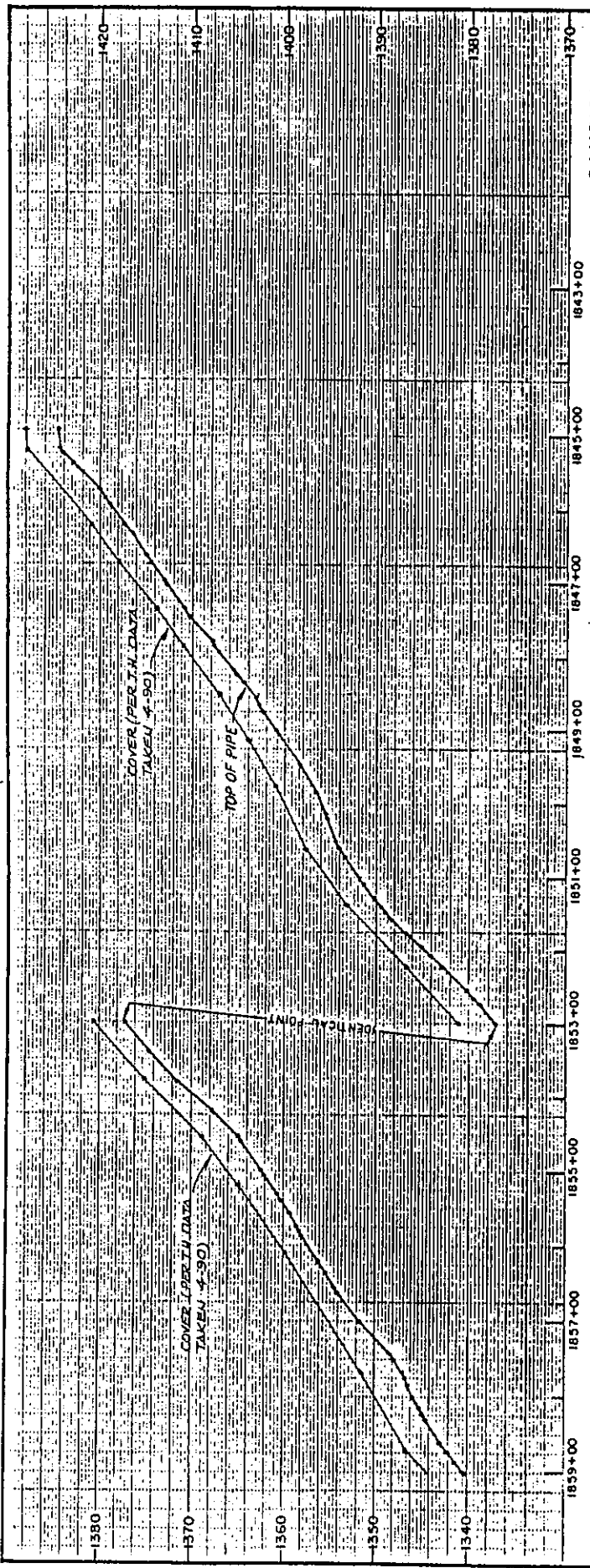
**CAUTION**

BEARING IN MIND THAT THIS PLAN IS A REVISION OF A PREVIOUS PLAN, THE ENGINEER HAS CONDUCTED VISUAL INSPECTIONS OF THE FIELD AND HAS FOUND THE INFORMATION TO BE CORRECT. THE ENGINEER HAS NOT CONDUCTED TESTS TO DETERMINE THE EXACT LOCATION OF THE LINE OR THE DEPTH OF THE LINE. THE ENGINEER HAS NOT CONDUCTED TESTS TO DETERMINE THE EXACT LOCATION OF THE LINE OR THE DEPTH OF THE LINE.

SEE DETAIL 'A'  
 ON DWG. Y-1669-08-B

REVISED DATE 3-81 BY 50-30  
 DATE 10-87 BY 80-4  
 FORMER Y-1670-B



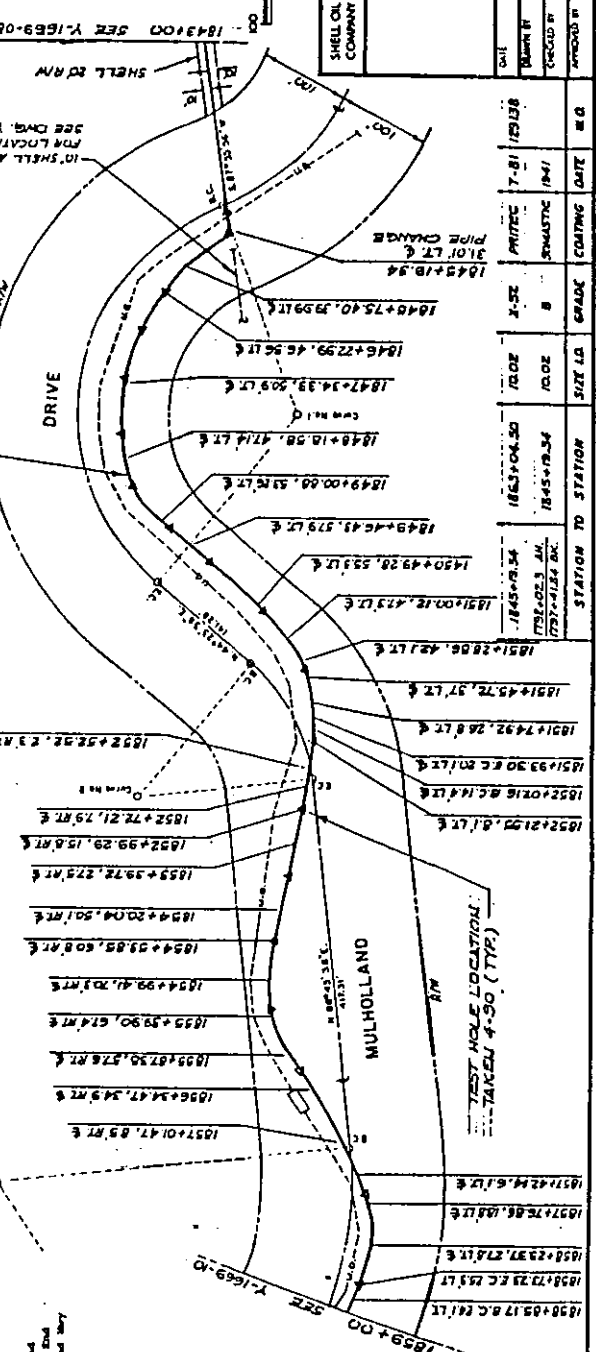


**CURVE DATA (E. ROAD)**

CURVE NO.	Δ	R	T	L
1	120° 00' 00"	2500.00	433.01	573.60
2	44° 20' 00"	200.00	81.45	134.73
3	62° 00' 00"	400.13	240.42	432.76

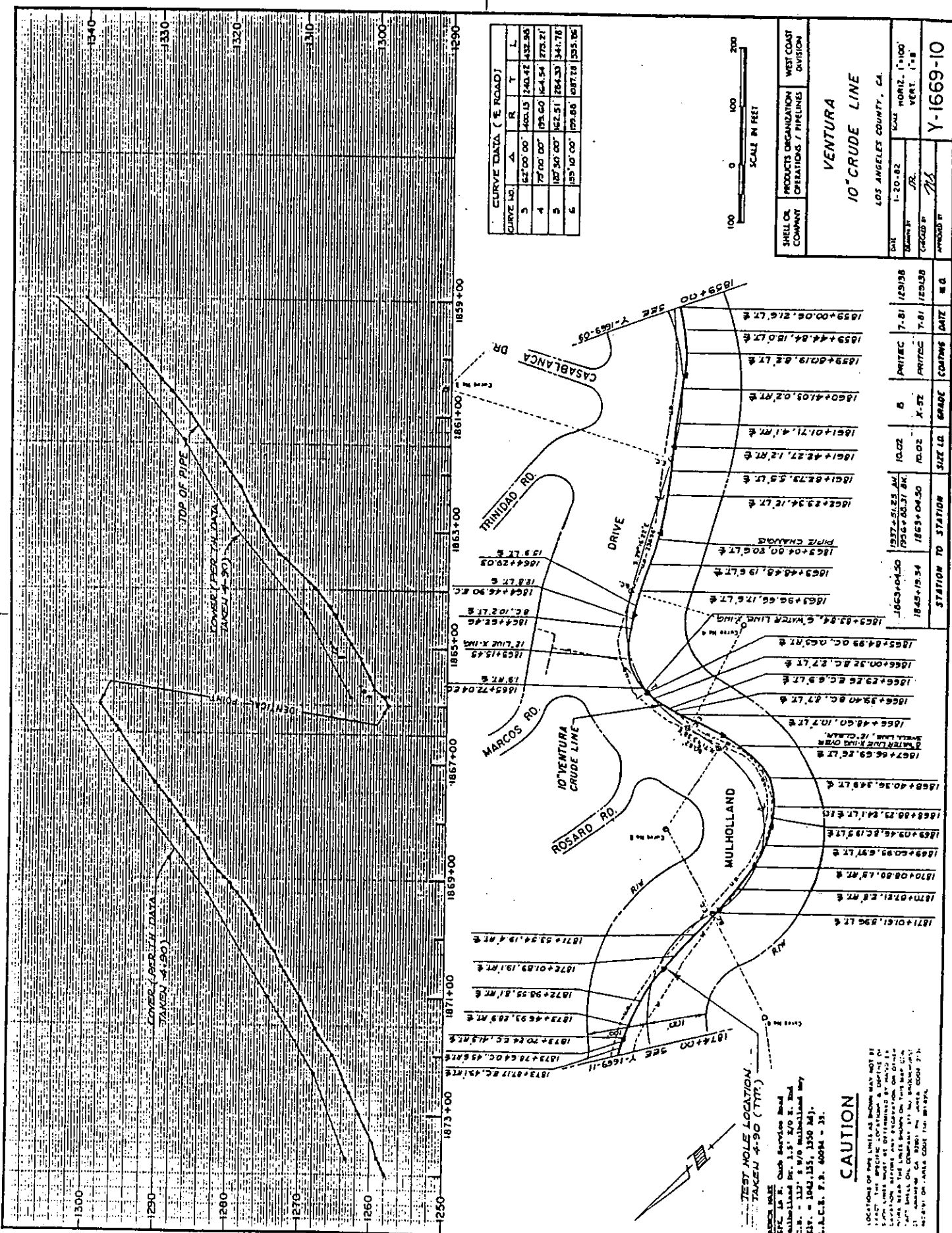
**RECORD MAKE**  
 SPE. AN B. QUID FAYLSON ROAD  
 MULHOLLAND DR. 1.5' R/O R. END  
 C.P. - 113' S W/O MULHOLLAND DR.  
 ELEV. - 1042.15', 1950 ADJ.  
 L.A.C.S. P.B. 40894 - 2)

**CAUTION**  
 LOCATION OF THIS LINE AS SHOWN WAS NOT BY  
 LEAST THE SPECIFIC LOCATION & DATE OF  
 THIS LINE MUST BE DETERMINED BY MEANS OF  
 SURVEY. THIS LINE IS NOT TO BE USED FOR  
 WORK NEAR THE LINE UNLESS APPROVED BY  
 THE DISTRICT ENGINEER. THE DISTRICT  
 ENGINEER'S OFFICE IS AT 1000 WEST  
 ST. ANGELES, CA 90007. PHONE: (213) 473-1111  
 TELETYPE: (213) 473-1111



SHELL OIL COMPANY	PRODUCTS ORGANIZATION OPERATIONS / PIPELINES	WEST COAST DIVISION
<b>VENTURA</b>		
<b>10" CRUDE LINE</b>		
LOS ANGELES COUNTY, CA.		
DATE	SCALE	HORIZ. 1"=100'
1-20-82	AS SHOWN	VERT. 1"=8'
PROJECT NO.	DESIGNED BY	APPROVED BY
Y-1669-10	WJS	WJS
PROJECT	DATE	SCALE
Y-81 10/13/8	10/1/82	AS SHOWN
STATION TO STATION	DATE	SCALE
1859+00 SEE Y-1669-10	10/1/82	AS SHOWN

REVISED 5.30 AM 2/72



CURVE DATA (E ROAD)					
CURVE NO	A	R	T	L	
3	62°00'00"	1403.15	240.42	432.88	
4	79°00'00"	179.60	164.54	279.21	
5	107°30'00"	162.51	284.33	341.78	
6	155°10'00"	179.98	107.78	135.96	



SHELL OR COMPANY	PRODUCTS ORGANIZATION OPERATIONS / PIPELINES	WEST COAST DIVISION
VENTURA 10" CRUDE LINE		
LOS ANGELES COUNTY, CA.		
DATE	1-20-82	SCALE
DRAWN BY	J.R.	HORIZ. 1"=100'
CHECKED BY	M.S.	VERT. 1"=8'
APPROVED BY		
		PROJECT NO.
		Y-1669-10

COVER (PERTH DATA TAKEN 4-90)

TOP OF PIPE  
DOWNER (PERTH DATA TAKEN 4-90)

TEST HOLE LOCATION  
TAKEN 4-90 (TTP)

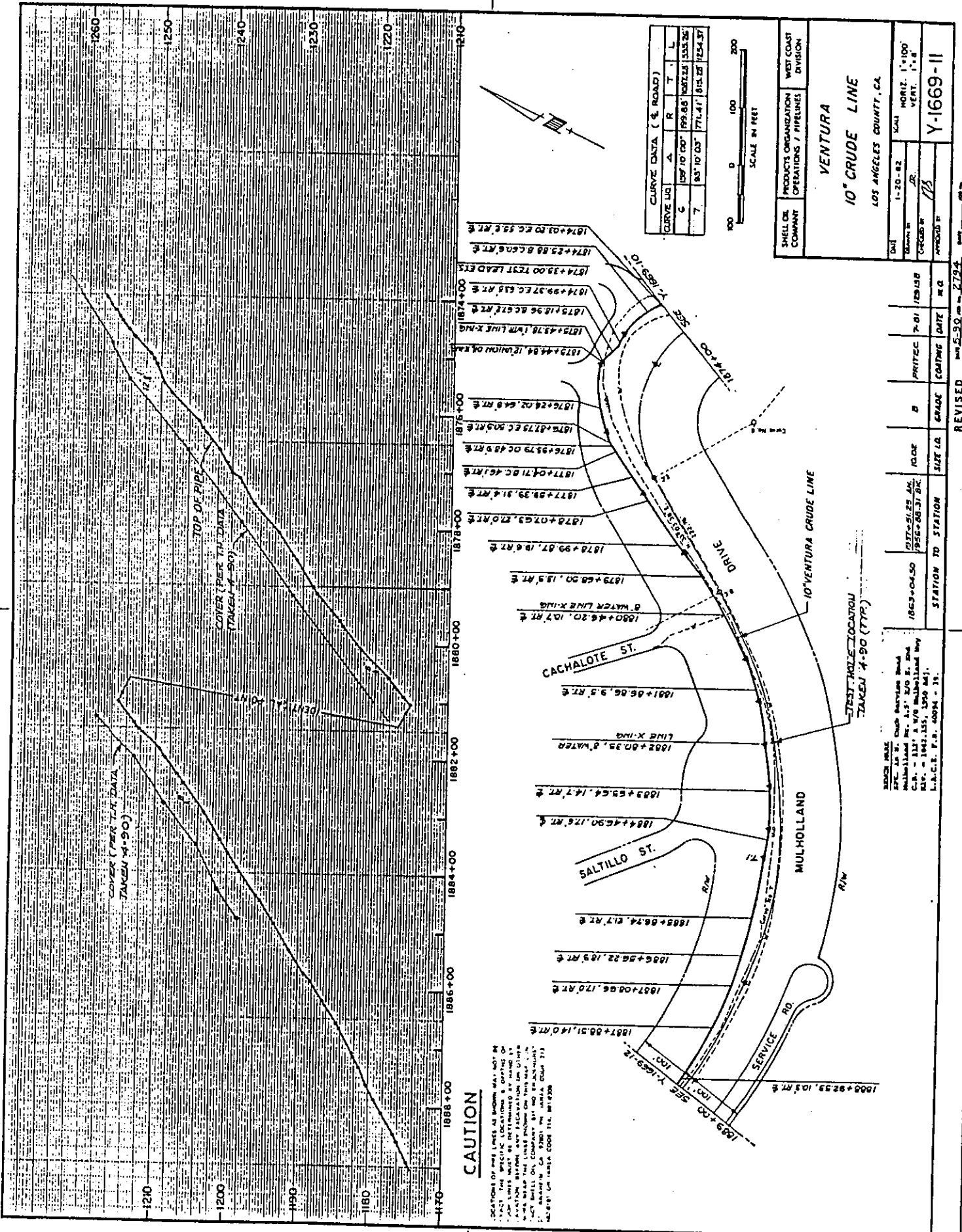
NOTE: SEE SHEET Y-1669-08 FOR LOCATION OF THIS HOLE. THE HOLE IS LOCATED AT STATION 1874+00 ON THE WEST SIDE OF THE LINE. THE HOLE IS 10 FEET DEEP AND IS USED FOR TESTING THE LINE. THE HOLE IS TO BE RE-TESTED AT A LATER DATE.

**CAUTION**

LOCATIONS OF PIPE LINES AS SHOWN MAY NOT BE EXACT. THE SPECIFIC LOCATION OF THE PIPE LINE SHOULD BE DETERMINED BY THE LOCATION SURVEYOR. THE LOCATION SURVEYOR SHOULD BE CONTACTED FOR THE LOCATION SURVEY DATA. THE LOCATION SURVEY DATA IS AVAILABLE AT THE LOCATION SURVEYOR'S OFFICE.

STATION TO STATION	SIZE	GRADE	DATE	NO.
1845+15.34	1853+04.50	X-32	7-81	129138
1853+04.50	1853+04.50	X-32	7-81	129138
1853+04.50	1853+04.50	X-32	7-81	129138

REVISOR: J.R. 3-82, M.S. 5-82, M.S. 5-82



**VENTURA**  
**10<sup>th</sup> CRUDE LINE**  
 LOS ANGELES COUNTY, CA

SHELL OIL COMPANY  
 PRODUCTS ORGANIZATION  
 OPERATIONS / PIPELINES  
 WEST COAST DIVISION

DATE: 1-20-82  
 DRAWN BY: JR  
 CHECKED BY: [Signature]  
 APPROVED BY: [Signature]

SCALE: HORIZ. 1"=100'  
 VERT. 1"=4'

PROJECT: Y-1669-11

REVISIONS

NO.	DATE	DESCRIPTION
1	1-20-82	ISSUED FOR CONSTRUCTION

STATION TO STATION

STATION	DATE	BY
1870+00 TO 1874+00	7-81	128/118
1874+00 TO 1876+00	7-81	128/118
1876+00 TO 1877+00	7-81	128/118
1877+00 TO 1878+00	7-81	128/118
1878+00 TO 1879+00	7-81	128/118
1879+00 TO 1880+00	7-81	128/118
1880+00 TO 1881+00	7-81	128/118
1881+00 TO 1882+00	7-81	128/118
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1885+00 TO 1886+00	7-81	128/118
1886+00 TO 1887+00	7-81	128/118
1887+00 TO 1888+00	7-81	128/118
1888+00 TO 1889+00	7-81	128/118
1889+00 TO 1890+00	7-81	128/118
1890+00 TO 1891+00	7-81	128/118
1891+00 TO 1892+00	7-81	128/118
1892+00 TO 1893+00	7-81	128/118
1893+00 TO 1894+00	7-81	128/118
1894+00 TO 1895+00	7-81	128/118

**CAUTION**

LOCATIONS OF PIPE LINES AS SHOWN MAY NOT BE EXACT. THE SPECIFIC LOCATIONS & DEPTHS OF PIPE LINES SHOULD BE DETERMINED BY FIELD SURVEY. THIS DRAWING IS THE PROPERTY OF THE COMPANY AND IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM. WITHOUT THE WRITTEN PERMISSION OF THE COMPANY, THIS DRAWING IS NOT TO BE USED FOR ANY OTHER PROJECT. SHELL OIL COMPANY 81100 DE ANTONIO, LOS ANGELES, CA 90001 TEL: (213) 744-3111 FAX: (213) 744-3112

COVER (PER T.M. DATA TAKEN 4-90)

TOP OF PIPE COVER (PER T.M. DATA TAKEN 4-90)

DETAIL POINT

SEE HOLE LOCATION TAKEN 4-90 (TYP.)

# **NOTICE**

**Equilon Pipeline Company LLC, on behalf of  
Shell Pipe Line Corporation and Texaco Trading  
& Transportation.**

**Please address all future Utility Inquiries  
regarding our facilities to:**

**Equilon Pipeline Company  
P.O. Box 6249  
Carson, CA 90749-6249  
ATTN: UTILITY COORDINATOR**

**\*\*\*\* NEW PHONE NO: (310) 816-2063 \*\*\*\***

**NOTE: For UPS, Fed-X, etc. MAIL TO:**

**Equilon Pipeline Company  
20945 S. Wilmington Ave.  
Carson, CA 90745  
ATTN: UTILITY COORDINATOR**

**We thank you in advance for your cooperation.  
Please update your records.**



Tosco Refining Company  
Distribution West  
9645 Santa Fe Springs Road  
P.O. Box 2628  
7721 Santa Fe Springs, CA 90670-0628  
Telephone: 562-906-7600  
Facsimile: 562-906-7555  
Right-of-Way Administration

December 13, 2000

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

Attn.: Mr. Charles Holloway  
Supervisor of Environmental Assessment

Gentlemen:

**Notice of Preparation**  
**A Draft Environmental Impact Report for**  
**The Mulholland Water Pipeline**

In response to your notice dated November 17, 2000 concerning the above project, we have facilities in the project area, as shown on our attached Drawing Nos. D4A420, D4A421, D4A422 and D4A423, that conflict with your plans.

Please give 48 WORKING HOURS NOTICE before excavating near our facilities by contacting:

Pipeline Dept.: Mr. Steve Gaska, Foreman-Maintenance at (310) 326-8777  
Mr. Dennis Muhlbach, Cad Operations at (562) 906-7590

If you have questions or need more information regarding Tosco's response to your inquiry, please contact Mr. Dennis Muhlbach.

Yours truly,

A handwritten signature in black ink, appearing to read 'Mona D. Hebert', written over a horizontal line.

Mona D. Hebert  
Coordinator, Right of Way Administration

cc: Dennis Muhlbach  
Paul Morton

Department of Water and Power



7721  
the City of Los Angeles

RICHARD J. RIORDAN  
Mayor

Commission  
KENNETH T. LOMBARD, *President*  
JUDY M. MILLER, *Vice president*  
RICK J. CARUSO  
MICHAEL I. KESTON  
DOMINICK W. RUBALCAVA  
JOHN C. BURMAHLN, *Secretary*

S. DAVID FREEMAN, *General Manager*

November 17, 2000

To: Interested Parties and Individuals

**Notice of Preparation**  
**A Draft Environmental Impact Report For**  
**The Mulholland Water Pipeline**

Pursuant to the State of California Public Resources Code and the "Guidelines for Implementation of the California Environmental Quality Act (CEQA)," as amended, the City of Los Angeles Department of Water and Power, as the local lead agency, is preparing a Draft Environmental Impact Report for the project described below.

Project Title: Mulholland Water Pipeline

Project Location: The proposed project would be located in the Woodland Hills area of the City of Los Angeles. The project would be constructed along Mulholland Drive between Greenbriar Drive and Picasso Avenue.

Project Description: The proposed project would be a new water pipeline. The project is needed to improve overall water system reliability to existing system users and provide water service to an already approved development (including Tract 33454) in the southwestern San Fernando Valley area of the City of Los Angeles.

Scoping Period: A brief project overview has been enclosed for your information. The scoping period for the Notice of Preparation will extend from November 23, 2000 to December 26, 2000. Please submit your comments in writing to Mr. Charles Holloway, Supervisor of Environmental Assessment, at the following address no later than December 26, 2000.

Mr. Charles Holloway  
Supervisor of Environmental Assessment  
111 N. Hope Street, Room 1044  
Los Angeles, CA 90012

**FILED**

DEC 12 2000

DENNIS L. MOHLBACH

**Water and Power Conservation ... a way of life**

111 North Hope Street, Los Angeles, California ☐ Mailing address: Box 51111, Los Angeles 90051-0100  
Telephone: (213) 367-4211 Cable address: DEWAPOLA FAX: (213) 367-3287



**MULHOLLAND WATER PIPELINE  
NOTICE OF PREPARATION  
PROJECT OVERVIEW**

Council District: 11

Date: November 17, 2000

Lead City Agency: City of Los Angeles  
Department of Water and Power

Project Title: **Mulholland Water Pipeline**

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**I. PROJECT DESCRIPTION**

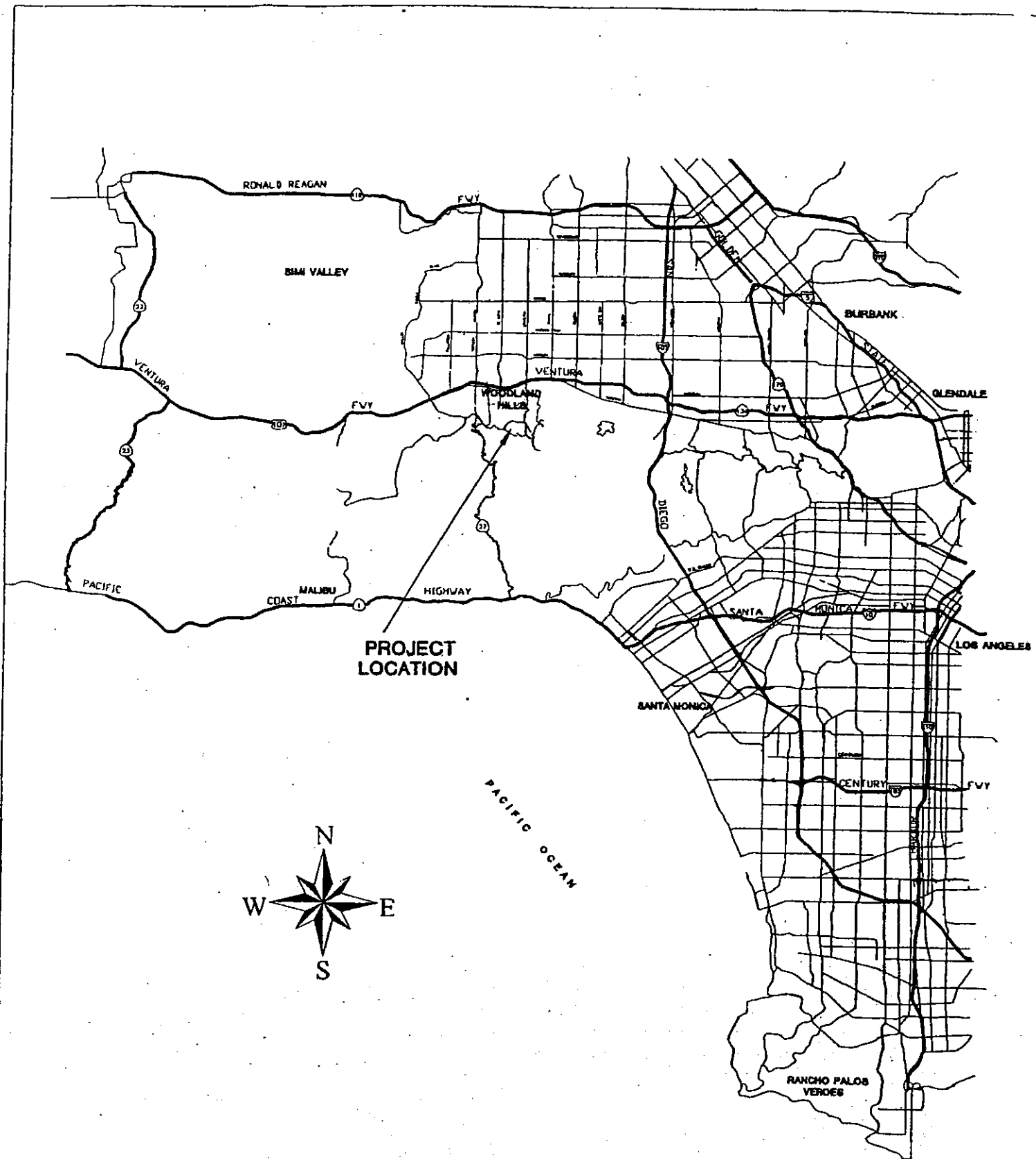
The proposed project would consist of the installation of approximately 11,100 linear feet of new 20-inch-diameter water distribution pipeline, and the replacement of approximately 3,500 linear feet of existing 12-inch-diameter water pipeline with new 16-inch diameter water pipeline. The proposed project would be constructed along Mulholland Drive, between Greenbriar Drive and Picasso Avenue in the Woodland Hills community of the City of Los Angeles. The attached Figures 1 and 2 illustrate the proposed project in relation to the region and proposed project location, respectively. The project is needed to improve overall water system reliability to existing system users and provide water service to already approved development (including Tract 33454) in the southwestern San Fernando Valley area of the City of Los Angeles, CA.

**II. PROJECT BACKGROUND**

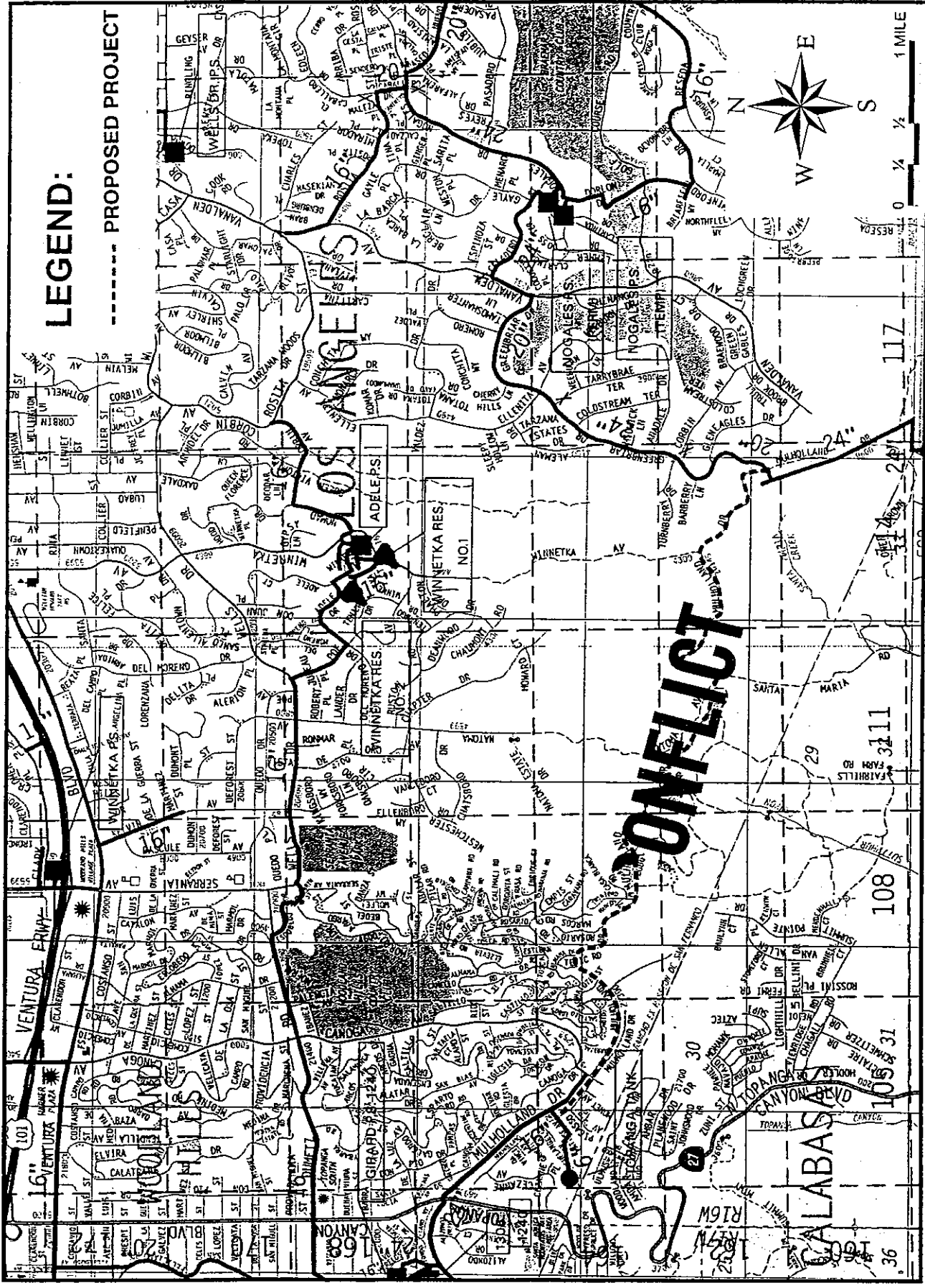
An Initial Study/Proposed Negative Declaration was previously prepared and circulated for public review on the proposed project. The review period extended from June 14 to July 14, 2000. The review period was subsequently extended until July 28, 2000. (Refer to Draft Negative Declaration and Initial Study for the Mulholland Water Pipeline Project, June 12, 2000; SCH #2000061066.) During the review period, comments were received from interested agencies and individuals. After consideration of the comments received during the public review period, it was decided that an Environmental Impact Report (EIR) be prepared for the proposed project. Based on the comments received, the EIR will focus on the areas of Growth and Geology.

**III. PROJECT ALTERNATIVES**

Pursuant to Section 15126.6 of the CEQA Guidelines, the EIR will describe a range of reasonable alternatives to the project, or to the location of the project. These alternatives will be evaluated on their comparative merits relative to the proposed project. The following alternatives are being considered and will be further discussed in the EIR. The locations of each of these alternatives are illustrated in the attached Figure 3.



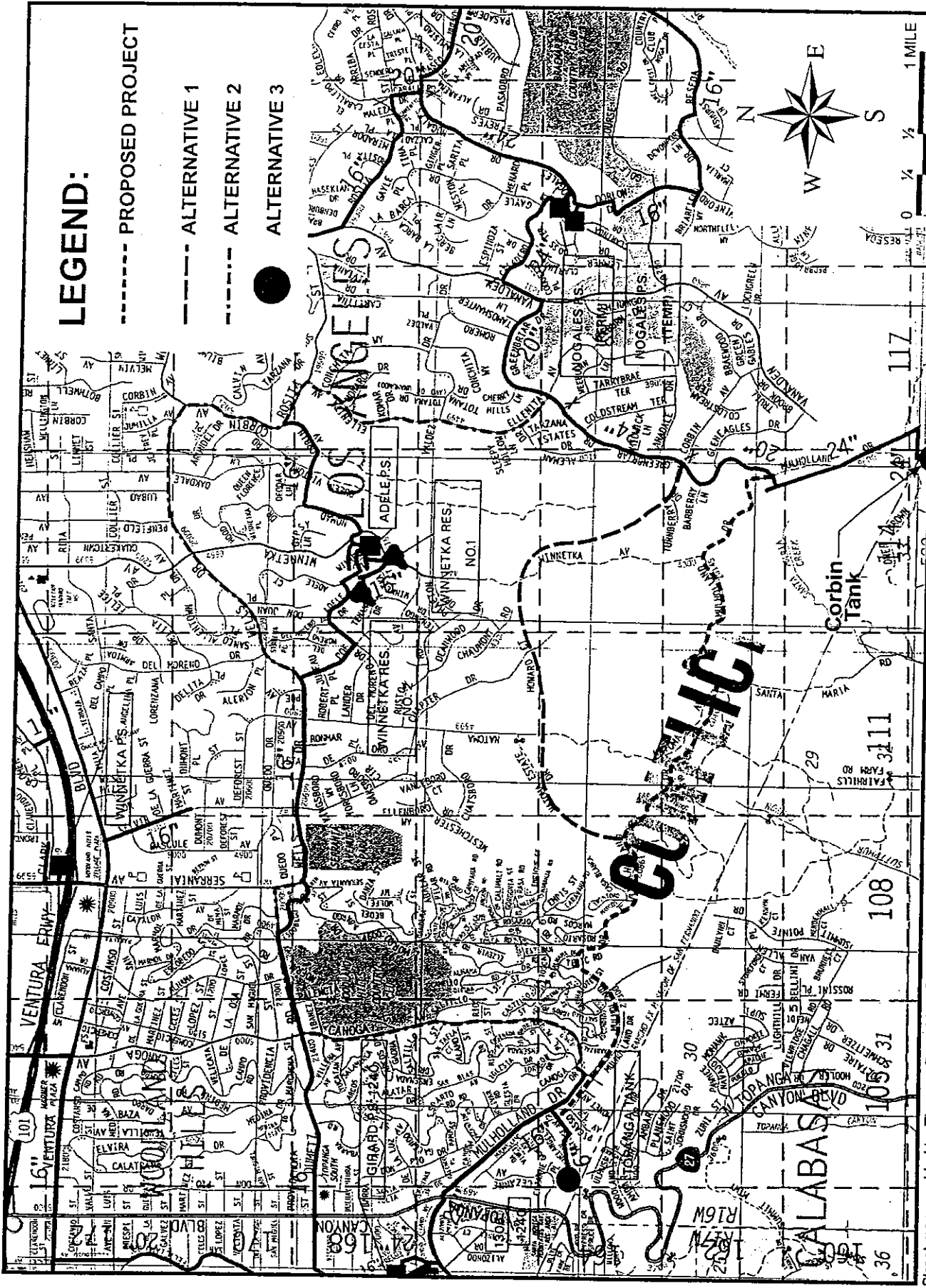
**FIGURE 1: REGIONAL LOCATION**



Street map provided by Thomas Bros. Maps®

ORCAGIS\Mulholland Water Pipeline\Figure2.cdr

Figure 2: Project Location



Street map provided by Thomas Bros. Maps®

ORCAGIS\Mulholland Water Pipeline\Figure3.cdr

**Figure 3: Project Alternatives**

Friends of Caballero Canyon  
19528 Ventura Blvd.#217  
Tarzana, CA 91356  
818-344-3620

facsimile transmittal

**To:** Mr. Charles Holloway      **Fax:** 213-367-3582

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**From:** Michael J. Belcher, Member of the Board, Friends of Caballero Canyon      **Date:** 12/24/00

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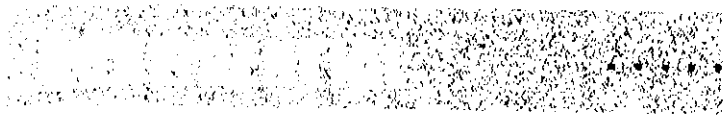
**Re:** Draft EIR Report for Mulholland Water Pipeline      **Pages:** 1 plus cover

---

**CC:** Mr. Mark Sedlacek, Mgr., Corporate Environmental Services

Urgent       For Review       Please Comment       Please Reply       Please Recycle

Friends of Caballero Canyon's response to Notice of Preparation – A Draft EIR For the Mulholland Water Pipeline, 11/17/00





(Faxed & mailed)

December 22, 2000

Mr. Charles Holloway  
Supervisor of Environmental Assessment  
111 N. Hope Street, Room 1044  
Los Angeles, California 90012

Re: Draft Environmental Impact Report For the Mulholland Water Pipeline

Dear Mr. Holloway:

We have reviewed the Notice of Preparation - A Draft Environmental Impact Report for the Mulholland Water Pipeline, dated November 17, 2000. The Board of Directors of the Friends of Caballero Canyon wishes to go on record as supporting Alternative number 3, as contained on page 2 of the Notice of Preparation - Project Overview, under paragraph III, B. We firmly believe that of all the proposed alternatives, Alternative number 3 is the least harmful to the environment.<sup>1</sup>

We strongly object to Alternative number 1. Any construction within the Mulholland Gateway Park would cause serious environmental damage, and interrupt already fragile habitat linkages. Such construction would further destabilize portions of Dirt Mulholland, which could ultimately place the pipeline in jeopardy.

Please keep us advised of any progress on this matter.

Very truly yours,

---

Michael J. Belcher  
Member of the Board

cc: Mr. Mark Sedlacek, Manager, Corporate Environmental Services

<sup>1</sup> We would prefer that the pipeline not be constructed, because it will only encourage more development in the Santa Monica Mountains. We are also mystified as to why a housing tract (Tract 33454) would be approved without a water supply already in place. During a time when water supplies (not to mention power supplies) are becoming more and more scarce, such hazardous planning is totally unjustified and inexcusable.

# JEFFER, MANGELS, BUTLER & MARMARO LLP

A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

TENTH FLOOR

2121 AVENUE OF THE STARS

LOS ANGELES, CALIFORNIA 90067-5010

TELEPHONE: (310) 203-8080

FACSIMILE: (310) 203-0567

SAN FRANCISCO OFFICE

TWELFTH FLOOR

ONE SANSOME STREET

SAN FRANCISCO, CALIFORNIA 94104-4405

TELEPHONE: (415) 398-8080

FACSIMILE: (415) 398-5584

REF./FILE NO.

INTERNET:  
JMB@JMBM.COM

JOHN M. BOWMAN

DIRECT DIAL: (310) 785-5379

December 21, 2000

60134-0001

Charles Holloway

Supervisor of Environmental Assessment

Los Angeles Department of Water and Power

111 N. Hope Street, Room 1044

Los Angeles, CA 90012

**Re: Notice of Preparation of Draft Environmental Impact Report  
For the Mulholland Water Pipeline**

Dear Mr. Holloway:

This office represents EPAC Development, LLC, the owner of property located at 21000 Mulholland Drive (the "Property"). On October 10, 1995, the Los Angeles City Council approved Vesting Tentative Tract Map ("VTTM") 33454, which allows the development of 25 single family homes on the Property.

This office has reviewed the Notice of Preparation ("NOP") for the proposed Mulholland Water Pipeline (the "Project"). The project description in the NOP indicates that the purposes of the Project are to improve overall water system reliability to existing system users and to provide water service to previously-approved developments in the southwestern San Fernando Valley area of the City of Los Angeles, including VTTM 33454. The NOP also indicates that there are currently three project alternatives under consideration, including two alternative alignments for the pipeline (Alternatives 1 and 2) and the "Topanga Tank Expansion" alternative (Alternative 3). Under Alternative 3, the existing 208,000-gallon Topanga Tank would be supplemented with a new additional 800,000-gallon storage tank and appurtenant facilities.

Please be advised that proposed Alternative 3 will not achieve the objective of providing water service to VTTM 33454. Specifically, it is our understanding that the proposed additional storage tank would be constructed at an elevation of approximately 1325 feet, which is too low to adequately serve the approved residential lots within VTTM 33454.

**JEFFER, MANGELS, BUTLER & MARMARO LLP**

Charles Holloway  
December 21, 2000  
Page 2

Thank you for your consideration. Please add the undersigned to the list of persons wishing to receive all future public notices in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "John M. Bowman". The signature is fluid and cursive, with a long horizontal stroke at the end.

**JOHN M. BOWMAN of  
Jeffer, Mangels, Butler & Marmaro LLP**

JMB:dg



# ***Mulholland Tomorrow***

---

*President*  
Robert M. Hertzberg

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

December 26, 2000

Mr. Charles Holloway  
Supervisor of Environmental Assessment  
111 North Hope Street, Room 1044  
Los Angeles, CA 90012

Re: Notice of Preparation  
Mulholland Water Pipeline

Dear Mr. Holloway:

In response to the Department's Notice of Preparation for the Mulholland Water Project, Mulholland Tomorrow submits the following comments and recommendations.

## **Scope of Environmental Impact Report**

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The Notice of Preparation states that the proposed Environmental Impact Report "will focus on areas of Growth and Geology." While we agree that these are important areas for analysis and discussion in the EIR, focusing on these factors alone will not adequately describe the environmental impacts of the proposed project. We urge the Department to include the entire range of potential impacts typically discussed in an EIR, specifically including the following:

1. **Wildlife habitat** — The EIR should discuss the potential for disruption of wildlife habitat and movement throughout the length of the proposed construction site during these activities. The presence of men and machinery, the excavation of the roadbed, and the storage of equipment and materials will alter the patterns of wildlife activity and movement in the parklands and open lands abutting the roadway and elsewhere in the vicinity. The EIR should analyze, characterize and quantify these impacts.

2. **Erosion** — The EIR should address the Department's proposal to install maintenance hole access covers in the embankment adjacent to the roadway. The soil surrounding these structures will be subject to erosion, which will weaken the structure of the roadway and the geological stability of the hillside, and cause deterioration in water quality and wildlife habitat.
3. **Resurfacing the roadway** — The EIR should address the Department's statement in the proposed Mitigated Negative Declaration that "An Excavation and Class 'A' Permanent Resurfacing Permit" would need to be acquired. The document did not explain, however, how the Department proposed to "resurface" this roadway. This aspect of the proposal should be thoroughly described and the impacts of resurfacing on geological stability, growth inducement, wildlife habitat, soil erosion and water quality should be evaluated. Even if the roadway is left unpaved, the compaction of the earth overlying the proposed pipeline creates a significant potential for differential absorption rates between the project site and the adjacent unpaved roadway. This differential could increase runoff and erosion of the roadway and hillside.
4. **Biological resources** — The EIR should examine and evaluate the biological resources of the roadway, rather than presuming them to be nonexistent. The proposed Mitigated Negative Declaration stated that "By nature of its use, no sensitive biological resources exist on the roadway that would be subject to impact from the proposed project." This statement does not recognize the unique nature of Dirt Mulholland, including the facts that this section of the roadway has been closed to most vehicle traffic for the last few years and is believed to be used as a transitway for wildlife. Dirt Mulholland is not a typical roadway that can be presumed to be without "biological resources."
5. **Construction materials** — The EIR should address the considerable vehicular activity required for hauling materials, excavating and hauling soil, and transporting cement and soil slurry entailed in this Mulholland project, including specifying where these materials are to be stored, used, or disposed of. The EIR should evaluate the impacts of the use and storage of these materials on the environmental and other resources in the vicinity of the project.
6. **Land use and planning** — The EIR should assess the significant impact of the proposed project on the Mulholland Scenic Parkway and the implementation of the Mulholland Scenic Parkway Specific Plan. Although the Specific Plan allows utility related structures, there must be a finding that feasible alternative locations do not exist outside of the inner corridor (Section 5.A.5, Mulholland Scenic Parkway Specific Plan). The Department should identify and discuss the feasibility of alternative locations in the EIR, as those alternatives relate to the provisions and goals of the Specific Plan. This analysis should be in addition to the anticipated analysis of alternatives pursuant to CEQA.

In addition, the EIR should discuss the impact of this project on the ability of the City to implement the Specific Plan in the areas to be served by this proposed water pipeline, including the currently undeveloped properties along the water pipeline route that potentially will be served by this facility.

7. **Conflict with existing environmental plans —** The EIR should discuss the impact and consistency of the proposed project on the "applicable environmental plans and policies" adopted by the Santa Monica Mountains Conservancy, the United States National Park Service, the California Department of Parks and Recreation, and the City of Los Angeles.
8. **Compatibility with existing land use in the vicinity —** The EIR should discuss in what way the project will be compatible with the existing land use in the vicinity, since it is inconsistent with the Mulholland Scenic Parkway Specific Plan and the planning efforts of the Santa Monica Mountains Conservancy, the United States National Park Service, the California Department of Parks and Recreation, and the City of Los Angeles. Because the project will make water service more readily available in an area that is currently undeveloped, the project has the potential to result in development that is inconsistent with the existing land use in the vicinity, which is primarily open space.
9. **Growth inducement —** The EIR should address the significant potential for the inducement of growth, both directly and indirectly, that would be created by the completion of this project. By providing water to an area that currently has limited water service, the proposed project will make it more likely that properties that are currently not scheduled for development due to water restrictions will be the targets of proposals to develop, relying on the improved availability of water service created by this project.

In addition, the EIR should address growth inducement effects in the West San Fernando Valley. The claimed improvements in the redundancy of the water supply to the West San Fernando Valley will make it more likely that areas distant from the Mulholland Corridor will also see increased growth pressure due to the additional water supply created by this project. Although the Department attempts to justify the Mulholland project on the basis of water redundancy during emergency periods, during non-emergency periods it will simply be an additional source of water that could support new growth and development in the West San Fernando Valley and adjacent areas.

Further, the EIR should consider the potential growth inducement impact of the proposed water pipeline on areas in Los Angeles County adjacent to the area to be served by the proposed Mulholland water pipeline, which are currently subject to water supply restrictions. There is currently a connection between the DWP water system and the Los Angeles County water system at the Girard pumping station, and water is diverted from the DWP system to the County system at this

connection. An increase in the availability of water created by the construction of the Mulholland water pipeline would make additional water supplies available for diversion by the County, potentially increasing growth and development in a currently undeveloped area.

10. **Geologic stability** — The EIR should evaluate the geological stability of the project location. This project poses a significant potential for fault rupture, seismic shaking, and ground failure. This potential is evidenced, for example, by previous rupturing of the Corbin Tank — which was presumably built in compliance with Uniform Building Codes — during previous earthquake episodes. Uniform Building Codes do not protect citizens and the environment where, as in the Santa Monica Mountains, the risks of faulting and rupture do not conform to the assumptions of the uniform code.

In addition, the EIR should address the potential for earthquake induced landslides in the vicinity of the project. The State Department of Conservation lists the region of the project site as having a significant potential for such earth movement.

11. **Leak and line failure** — The EIR should address the likelihood that any leak or failure in the proposed pipeline would go undetected (as has happened in the past). Such undetected leaks could create destabilize the roadway and adjacent hillsides through soil saturation, and endanger water supplies to properties relying on the water line for supply.
12. **Air quality standards** — The EIR should address the violations of South Coast Air Quality Management District standards that were predicted in the proposed Mitigated Negative Declaration. These violations, their impacts, and complete mitigation should be examined further in the EIR.
13. **Species and habitats** — The EIR should describe the impacts of the construction and operation of the proposed water pipeline on the biology of Mulholland Drive and the Mulholland Scenic Corridor. This description should be based on analysis and survey of the biota in the vicinity, and address the potential impact of this project on both the species and the habitat of the project area. His evaluation should also specifically reference the work of the other agencies with land use and wildlife management in the vicinity, including the Santa Monica Mountains Conservancy, the California Department of Parks and Recreation, and the National Park Service.
14. **Scenic and aesthetic effects** — The EIR should address the presence of construction equipment, the erosion of the roadway from differential absorption, and the erosion around the maintenance valves, and the impacts of this equipment and activity on the ability of citizens to enjoy scenic nature of this portion of the Mulholland Scenic Parkway.

15. **Historical resources** — The EIR should address the status of the roadway itself as an historic resource that has been proposed for nomination for the National Registry of Historic Places.
16. **Existing recreational opportunities** — The EIR should discuss the potential for the project to disrupt the recreational use of the roadway both in the short term and the long term. In the short term, the presence of equipment, haul trucks, excavation and construction will disrupt the use of the roadway by hikers, bikers, wildlife enthusiasts and others whose recreation is based on the roadway and its environs being maintained in a condition that is substantially natural and undisturbed. Further, the inducement to growth along Mulholland Drive that will follow from this project will permanently detract from these recreational uses by reducing or eliminating the existing natural and undisturbed environment.

### **Alternatives to the Proposed Project**

The Department has stated two goals in the Notice of Preparation — improving water system reliability to existing water system users and providing water service to Tract 33454. These are independent goals, and need not be addressed by a single project. In identifying and evaluating alternatives in the EIR, the Department should include alternatives that address these goals with separate projects, rather than being limited to alternatives that combine these goals in a single project, such as the proposed Mulholland Pipeline Project. Under this approach, there could be one project identified that addresses the goal of improving water system reliability to existing water system users, while a separate project addresses providing water service to Tract 33454. Unless this approach is included in the consideration of alternatives in the EIR, the EIR will be deficient.

The Notice of Preparation identifies four structural alternatives for achieving the goals of the proposed Mulholland water pipeline project -- expanding the Topanga Tank; rerouting the pipeline through Ellinita, Wells and Canoga streets; and rerouting the pipeline through Mulholland Gateway Park. Although each of these alternatives have beneficial and detrimental aspects, they are appropriate selections and they should be evaluated. There are other structural alternatives for achieving these goals through a single project, however, that should also be evaluated. In addition, the Department should consider alternatives for achieving the Department's goals that are non-structural in nature.

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

1. **Tie-in to Los Angeles County/Topanga Canyon Trunk Line** — The EIR should consider the alternative of a permanent emergency connection between the DWP water system and the County of Los Angeles water system. The Public

Works Department of the County of Los Angeles has proposed to construct a major water line up Topanga Canyon to increase and improve water service to the portions of the County adjacent to the Mulholland pipeline service area. Under an arrangement similar to that under which the County currently diverts water from the DWP system in an emergency, the DWP could arrange to divert water from the County's Topanga line. Understanding the decades-long planning horizon for water supply systems, inter-connecting the two systems could provide for greater long-term security of supply than expanding a single system.

2. **Tie-in with the Metropolitan Water District —** The EIR should consider the alternative of a permanent emergency connection between the DWP water system and the Metropolitan Water District water system. The Metropolitan Water District's West Valley and Calabasas Feeder lines parallel the Granada Trunk over much of its length. Interconnections between these lines at, for instance, Leonora and Valley Circle, could enhance system reliability in the West Valley by allowing each system to support the other in times of system outages.
3. **Expansion of the Kittridge Tanks —** The EIR should consider expansion of the Kittridge Tank facility by constructing one or more additional tanks at this existing facility. This facility currently provides additional stored water to serve the West Valley area during interruptions of water supply through the Granada Trunk line. Expansion of the tank capacity at this location would provide still-greater redundancy in water supply. Because this site is already the location of storage facilities, additional construction should have minimal environmental impact.
4. **Purchase of emergency equipment —** The EIR should evaluate the impacts of the Department purchasing additional equipment and implementing additional measures to respond to water outages caused by pipeline breaks and equipment malfunctions. The goal of increasing the reliability of the water system in the West San Fernando Valley has been explained by the Department, in part, as an effort to ensure that water can be provided to this area in times of emergency, such as the 1994 Northridge earthquake, or other instances of major disruptions from power outages and equipment failure. During the 1994 Northridge earthquake, failures in the water lines serving the West Valley were "patched" on a temporary basis by employing fire department pumper trucks to pump water around the breaks. As a non-structural alternative, the Department should consider purchasing and having available its own pumper trucks and related equipment that can be dispatched to these emergency locations. By having its own equipment, the Department could avoid conflicts with the fire department over priorities in the use of this equipment, and could use the equipment in other parts of the Department's service area. By having its own equipment, the Department could also increase the flexibility of its response to outages, particularly in the event that water pipelines are damaged throughout the region in another seismic incident.

5. Construction of water tank at Tract 33454 — The EIR should evaluate the impact of providing water to Tract 33454 from the existing water line, located in Mulholland Drive, and storing the water in a storage facility to be located on-site. Improvement of the Girard pumping station and the water lines adjacent to Tract 33454 may be necessary to achieve the necessary increases in water quantity and water pressure. The water could be pumped to a storage facility located on Tract 33454. The storage facility would have to be located on a site that is not a visible ridge, a designated open space, or other environmentally sensitive area, such as in the "bowl" of Tract 33454 within a portion of the tract currently designated for development.
  
6. Construction/expansion of existing 1240' water pipeline — The Department's West Valley District System Supply Map depicts a 12-inch water line connecting the Adele Pumping Station and the Girard Pumping Station. The EIR should evaluate the impacts of expanding and/or modifying this existing line, as necessary, to provide the link between the Corbin Tank and both Tract 33454 and the Girard Trunk. Because a waterline exists in this location, the costs and disruption of construction of a new or expanded water pipeline should have fewer impacts than the construction of a new line in a new location. [This alternative may be identical to or similar to the Department's alternative number 2. That alternative, however, does not indicate that this is the route of an existing water pipeline.]

These proposed alternatives should be understood to be both specific recommendations for inclusion in the EIR, and as suggested approaches for the Department to use in developing alternatives in addition to those proposed in the Notice of Preparation and in this letter.

If you have questions concerning these comments, please contact me at (310) 318-2777, or by fax at (310) 374-1870.

Sincerely,



Barry Read  
Executive Director

cc: Hon. Cindy Miscikowski, Los Angeles City Council  
Hon. Fran Pavley, California State Assembly  
Hon. Sheila Kuehl, California State Senate  
Joseph Edmiston, Santa Monica Mountains Conservancy  
Art Eck, Santa Monica Mountains National Recreation Area

**FAX TRANSMISSION**

**MULHOLLAND TOMORROW  
7510 Sunset Boulevard #1401  
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<b>To:</b>	Charles Holloway Department of Water and Power	<b>Date:</b>	December 26, 2000
<b>Fax #:</b>	(213) 367-3582	<b>Pages:</b>	8 , including this cover sheet.
<b>From:</b>	Barry Read		
<b>Subject:</b>	Comments on Notice of Preparation of EIR Mulholland Water Pipeline Project		





**WHHO**  
**Woodland Hills**  
**Homeowners Organization**  
P.O. Box 6368, Woodland Hills, Ca 91365

December 24, 2000

Mr. Charles Holloway  
Supervisor of Environmental Assessment  
111 N. Hope Street, Room 1044  
Los Angeles, CA 90012

Mr. Charles Holloway:

This is in response to your "Notice of Preparation, A Draft Environmental Impact Report for the Mulholland Water Pipeline".

Our Comments are as follows:

1. We find the **A. No Project Alternative** to be superior to the others. We have not found any compelling reason for this project, especially when Mr. David Freeman wrote a letter dated May 19, 1998 that this was not a high priority. Nothing has changed for the welfare of the public that would raise the priority level for this project. There has never been a need for this project except for the pressure of a development that in its own EIR stated they would get water from another source. The fact that they offered \$500,000.00 to bring water from the Corbin Tank after their failure to get water from other sources shows that the developer must provide all water at his expense, not the public's. In fact the City of Los Angeles erred in approving this tract if the developer was not required to live up to his own EIR. We feel that the City of Los Angeles and the Department of Water and Power are disenfranchising the public by trying to commit to something at public expense that by all State standards of subdivisions is required that the developer in his EIR and subdivision identify how services will be supplied.
2. We find that the **B. Alternative #2** would, if it was necessary for the good of residents of the area which currently it is not, be the second best after No Project.
3. We find the **B. Alternative #1** to be unacceptable because it would traverse Park Land and the disturbances to the wildlife and its corridors to be completely unacceptable.



**WHHO**  
**Woodland Hills**  
**Homeowners Organization**  
P.O. Box 6368, Woodland Hills, Ca 91365

4. We find the **B. Alternative #3** to not be wise. Since the formations in this area are not highly stable, both the amount of grading required and size and weight of the project put the surrounding homes in the area of the tank proposed in great danger. Remember water weight 8 lbs per gallon so 800,000 equals 6,400,000 lbs or 3200 Tons plus the tonnage of the Tank and its appurtenant facilities. We think your geology studies will question the wisdom of this proposal.
5. We find your proposed project to be totally unacceptable because of the problems of the roadbed erosion that would be caused by the proposal. We also find that this, as proposed, is a gift of ratepayers funds to subsidize a developer who violated his own EIR and the Subdivision Map act.

We therefore respectfully ask that you abandon the Proposed Project and take the *No Project Alternative*.

Respectfully:

A handwritten signature in cursive script that reads "Gordon Murley". The signature is written in black ink and is positioned above the printed name and title.

Gordon Murley  
President

CC: Councilwoman Cindy Miscikowski  
Assemblywoman: Fran Pavley  
Senator: Sheila Kuehl  
Supervisor: Zev Yaroslavsky  
Congressman: Brad Sherman  
SMCM Executive Director: Joe Edminston  
City Attorney: James Hahn