

# **Mitigated Negative Declaration**

## **Hansen Area Water Recycling Project**



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

**October 2005**



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## **1.0 Introduction**

Under the California Urban Water Management Planning Act, the Los Angeles Department of Water and Power (LADWP) is required to develop a water management plan every five years to identify short- and long-term water demand measures to meet growing water demands. The plan includes identifying alternative sources of water, such as recycled water. As part of its efforts to promote the efficient use and management of its water resources, LADWP has proposed the Hansen Area Water Recycling Project. The proposed project has been developed to provide an alternative water supply for irrigational uses, and is an extension of the East Valley Water Recycling Project whereby recycled water generated at the Tillman Water Reclamation Plant is conveyed to the east side of the San Fernando Valley. Water reclamation/recycling is defined as the beneficial use of treated wastewater for such planned uses as irrigation, industrial cooling, recreation, groundwater recharge, environmental enhancement, and other uses permitted under California law. The Governor of California, U.S. Environmental Protection Agency – Region 9, California Water Resources Control Board, California Department of Health Services, and the U.S. Bureau of Reclamation have adopted statements in support of water recycling as an important element of California's water supply policy. The Los Angeles City Council has adopted a goal of reusing 250,000 acre-feet of water per year (AFY) by the year 2010. Refer to Section 3.0 below for additional information on the quality of recycled water and its permitted use.

## **2.0 Project Description**

The Hansen Area Water Recycling Project would consist of the construction of approximately 31,900 linear feet of ductile iron pipeline, a booster pump station, and a one-million-gallon recycled water storage tank. Construction of the proposed project would occur along existing street rights-of-way or within open space. The proposed project would also include the construction of appurtenant structures in public rights-of-way, such as flow meters, maintenance access holes, valves, and/or vaults, as necessary for the operation and maintenance of the pipeline.

Once completed, the proposed project would expand the utilization of reclaimed/recycled water for irrigation of the Hansen Dam Recreation Area and the newly opened Angeles National Golf Course (ANGC), and thus, reduce the amount of potable (drinking) water required for non-potable uses, ensuring that the best and purest sources of water will be reserved for the highest use – public drinking water. Using recycled water for non-potable uses, such as irrigation, also provides for improved availability, and therefore reliability, of the City's potable (drinking) water supply. The proposed project would ultimately provide recycled water to the new distribution infrastructure to serve other recycled water customers within the eastern San Fernando Valley.

**Project Location:**

The proposed pipeline alignment from south to north is as follows:

- LADWP Valley Generating Station (VGS) from the connection to a seven-million-gallon, recycled water storage tank and new booster pump station, southeast to Truesdale Street (which is an LADWP service road through the VGS site);
- Northeast along Truesdale Street to its intersection with Glenoaks Boulevard (through LADWP property);
- Glenoaks Boulevard from Truesdale Street northwest to Osborne Street;
- Osborne Street from Glenoaks Boulevard to Foothill Boulevard;
- Foothill Boulevard from Osborne Street to Conover Street; and
- Conover Street (via Conover fire road) to the connection to a new one-million-gallon, recycled water storage tank just north of ANGC.

The proposed booster pump station would be located entirely within the LADWP VGS facility. The proposed recycled water storage tank would be located in an open space area just north of ANGC that would be donated to the City by ANGC as part of the golf courses dedication of utility easements. The ANGC was required to investigate the potential use of recycled water for irrigation as part of their Conditional Use Permit issued by the City. The proposed location of the tank would affect the 40 acres on the northerly slopes directly adjacent to the golf course that ANGC has committed to dedicate to the Santa Monica Mountains Conservancy.

**Construction Activities:**

If approved, the construction of the proposed project is anticipated to commence in November 2005 and would be completed by May 2008.

Construction of the pipeline portion of the proposed project would occur at the LADWP VGS facility, along existing street rights-of-way, and within open space areas using an open trench excavation method, except at busy intersections (e.g., Glenoaks Boulevard at Osborne Street, and Osborne Street at Foothill Boulevard), where the proposed pipeline may be installed using the jacking method. The pipeline segment along Glenoaks Boulevard across Tujunga Wash would be suspended from the existing bridge. If this is not feasible, the proposed pipe segment may be installed using the jacking method under Tujunga Wash.

The open trench method involves site preparation, excavation, and shoring of an open trench, pipe installation, backfilling, and street and/or landscape restoration. Construction would progress along the alignment with the maximum length of open trench at one time being approximately 500 feet in length with a work area of approximately 2,000 linear feet.

The jacking method involves site preparation, excavation, and shoring of jacking and receiving pits, pipe installation, backfilling, and street and/or landscape

restoration. Pipe-jacking is an operation in which the soil ahead of the steel casing is excavated and brought out through the steel casing barrel while the casing is being pushed forward by a horizontal, hydraulic jack which is placed at the rear of the casing. Once the casing is placed, the pipe is installed inside the casing. Although the installation of pipeline using the jacking method avoids the continuous surface disruption common to the open trench method, some surface disruption is unavoidable because jacking and receiving pits are required and may be located in the street right-of way.

Both construction methods would require an off-site staging area. Since the publication of the Initial Study/Mitigated Negative Declaration (IS/MND), LADWP has determined that it will not use the vacant parcel south of Interstate 210 at Wheatland Avenue as a staging area, and has proposed an area adjacent to the Hansen Dam Sports Complex bordered by the I-210 Osborne offramp on the north and Foothill Blvd on the south and west that is currently leased to Valley Crest for tree storage as an alternate location. If this site is unavailable, then LADWP proposes to use another site in close proximity to the proposed project alignment but not the I-210/Wheatland site.

Construction of the booster pump station would occur within the bermed area surrounding the existing seven-million-gallon storage tank at the LADWP VGS facility. Construction of the station would occur entirely on LADWP property and include grading, foundation work, trenching for pipeline sections, and construction of the pump station facility.

Construction of the one-million-gallon storage tank would consist of grading/excavation for the new tank, tank construction, backfilling, and site restoration, including landscaping. Construction of the tank would also involve the minor improvement of the Conover Fire Road for maintenance access, cut and fill slopes to comply with building codes, a down slope berm and landscaping to help conceal the tank from local views, and surface drainage benches to control erosion from surface runoff. The proposed tank would also be installed at least partially below grade to help conceal the tank from community view. Actual construction methods and activities associated with the construction of the storage tank would be developed primarily with the engineer and the contractor consistent with criteria developed by jointly by LADWP and the affected community representatives. Conover Fire Road would remain unpaved and trail access suitable for equestrian uses would be maintained at the completion of project construction.

Construction of the proposed project would also be conducted in accordance with:

- Compliance with Standard Specifications for Public Works Construction (Greenbook);
- Compliance with City of Los Angeles Work Area Traffic Control Handbook (WATCH);

- Compliance with traffic control plans approved by the Los Angeles Department of Transportation to allow acceptable levels of service, traffic safety, and emergency access for the local community;
- Compliance with South Coast Air Quality Management District (SCAQMD) applicable requirements, including Rule 403 concerning fugitive dust emissions;
- Compliance with all applicable water quality rules, regulations, and standards (e.g., Clean Water Act, California Water Code, Basin Plan for the Los Angeles Region);
- Monitoring by a qualified archaeologist during construction in sensitive areas;
- Monitoring by a qualified paleontologist during construction in sensitive areas;
- Monitoring by a biologist during tank excavation and grading activities to ensure avoidance of potentially sensitive habitat areas.
- Proper maintenance and operation of muffling devices on all construction equipment;
- Use of noise control devices, such as equipment mufflers, enclosures, and barriers;
- Staging of construction operations as far from noise-sensitive uses as possible; and
- Maintenance of effective communication with local residents during construction including keeping them informed of the schedule, duration, and progress of construction.

### **3.0 Recycled Water Quality Information**

Recycled water use is encouraged in the State of California to preserve other higher-quality water supplies for other uses. The State Legislature has established a goal of using 1,000,000 AFY of recycled water by the year 2010. The California Water Code states that the use of potable domestic water for non-potable uses, including, but not limited to, cemeteries, golf courses, parks, highway landscape areas, and industrial and irrigation uses, is a waste and unreasonable use of water if recycled water is available that meets specified conditions for its use.

The State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. CCR, Title 17, Sections 7583 through 7586 and 7601 through 7605 set forth criteria for protecting the potable water system from cross-connections with non-potable supplies. The State of California Department of Health Services (DHS) has set water recycling criteria (Title 22), and the Regional Water Quality Control Board enforces the Title 22 regulations and issues the necessary permits for the production, testing,



and operations of recycled water facilities, such as the Tillman Water Reclamation Plant, to assure all regulations and conditions are met.

The City of Los Angeles has been successfully using recycled water for irrigation purposes since 1979 when the Department of Recreation and Parks began irrigating with recycled water in portions of Griffith Park. Today, LADWP, County Sanitation District, Las Virgenes Municipal Water District, and West Basin Municipal Water District serve recycled water to nearly 500 different sites for irrigation and industrial purposes throughout Los Angeles County. Some of the sites within the City currently using recycled water for irrigation include:

- Sepulveda Basin Wildlife Lake;
- Lake Balboa;
- Loyola Marymount University;
- Universal Studios;
- Charles Neilson Youth Park;
- Griffith Park (Wilson and Harding Golf Course and Gene Autry Museum Area);
- Los Angeles International Airport; and
- Lakeside Golf Club.

The recycled water to be distributed through the proposed Hansen Area Water Recycling Project facilities would meet or exceed all state and federal water quality criteria for recycled water supplies. Disinfected, tertiary treated wastewater, such as would be used in the proposed project, is approved for uses including the following:

- Food crops, including edible root crops;
- Parks and playgrounds;
- School yards;
- Residential landscaping; and
- Unrestricted access golf courses.

The State code would allow private (restricted access) golf courses, such as ANGC, to be irrigated with disinfected secondary water, but full tertiary treatment and disinfection, which produces higher quality water, would be performed on all water used as part of this project.

LADWP has tested its water supplies for the presence of pharmaceutical compounds including the recycled water from the Tillman Plant. The water was analyzed for 29 pharmaceutical compounds heavily prescribed in the United States. No drug residues were detected in any of the water supplies. LADWP continues to work with the health and regulatory agencies to ensure the water delivered to its customers meets all regulatory requirements.

#### **4.0 Environmental Findings and Determination**

The IS/MND was completed in accordance with Section 15063 and Section 15064 and Article 6 of the CEQA Guidelines (2003). The IS/MND analysis determined that there would be a less than significant impact on the environment with the mitigation measures proposed in the IS/MND (refer to the Mitigation Monitoring and Reporting Program for the mitigation measures proposed to avoid or reduce potential impacts). In light of the whole record included in this Final MND, there is no substantial evidence that the project may have a significant effect on the environment. Therefore, it has been determined that the proposed mitigation measures are sufficient to address and mitigate potential project impacts to less than significant levels.

## 5.0 Corrections and Additions

This section provides a list of edits that were made to the Final MND and Project based on comments received from the public during the Draft IS/MND public review period. This section is subdivided into subsections that correspond to edits made to the Proposed IS/MND (Attachment C) and those added to the Proposed Project.

### **Edits to Proposed IS/MND (Attachement C):**

Section 1.0, Project Description, under Subsection 1.2, General Setting, on page 1-1, replace the last sentence with the following:

*There are four schools (3 public and 1 private), a former hospital (now a drug treatment facility) and 3 sanitariums located within ½ mile of the proposed 6-mile alignment. The Lakeview Terrace Special Care Center sanitarium is the nearest facility, which is adjacent to the northern terminus of the project alignment.*

Section 1.6.1, Construction Methods, Pipeline Construction, on page 1-5, replace the last sentence of the first paragraph with the following:

*Possible staging areas identified for the proposed project include: the LADWP VGS facility and undeveloped parcel(s) along or adjacent to the proposed project, such as the lot adjacent to the Hansen Dam Sports Complex, which is currently being leased to Valley Crest Tree Company for tree storage. The vacant parcel south of Interstate 210 at Wheatland Avenue would not be used as a staging area for the proposed project.*

Section 1.11, Required Permits and Approvals, on page 1-10, add a bullet stating the following:

- *Metropolitan Water District of Southern California (MWD) – Discretionary action required due to financial participation in the project under the Local Resources Program administered by MWD.*

Section 2.0 Initial Study Checklist, on page 2-3, add a bullet under Responsible/Trustee Agencies stating the following:

- *Metropolitan Water District of Southern California*

Section 3.0, Discussion of Environmental Impacts and Mitigation Measures, I. Aesthetics, under b) Substantially damage scenic resources, .... within a state scenic highway, starting on page 3-1, replace the last 4 sentences with the following:

*Therefore, no impacts to state scenic highways would result from construction or operation of the proposed project and no mitigation is required.*

*Roadways that provide scenic views within and around the City of Los Angeles are classified by the City as designated scenic highways.<sup>1</sup> On December 19, 2003, the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan (Specific Plan) was adopted (Ordinance No. 175,736, effective February 8, 2004). The Specific Plan sets forth provisions for the preservation, protection, and enhancement of the unique natural and cultural resources in the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon and Sun Valley-La Tuna Canyon Community Planning areas. Included in the Specific Plan are standards and measures intended to regulate development within designated Prominent Ridgeline, Equine Districts, and Scenic Highway Corridors. The proposed location of the 1MG tank along the Conover Fire Road is not within a designated Prominent Ridgeline or within an area 60 vertical feet from a Prominent Ridgeline. In the area of the proposed project, Foothill Boulevard – Wentworth Street to Osborne Street is designated a scenic highway by the City of Los Angeles. The linear portion of the proposed project would follow portions of the Foothill Boulevard designated Scenic Highway Corridor. There are no provisions in the Specific Plan that prohibits construction or operation of infrastructure within the scenic corridor. Operation of the pipeline portion of the proposed project would not adversely affect views along the scenic highway, as the pipeline would be buried below grade. Also, there are no visual impacts of the 1MG tank from the Scenic Corridor as the corridor area provisions extend 500 feet on either side of the centerline of the roadway of each of the Scenic Highways and the proposed tank would be approximately 0.5 miles from Foothill Boulevard.*

Section 3.0, Discussion of Environmental Impacts and Mitigation Measures, I. Aesthetics, under c) Substantially degrade the existing visual character or quality of the site and its surrounding, starting on page 3-2, replace the last 2 sentences with the following:

*These structures are common elements of the urban environment, and although they are placed aboveground in proximity to, though not within (as discussed above), roadways designated as scenic highways by the City of Los Angeles General Plan Transportation Element and San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan, they are not anticipated to significantly impact the visual character of the surrounding community. Therefore, impacts to the visual character of the surrounding area would be less than significant, and no mitigation is required.*

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<sup>1</sup> City of Los Angeles Department of City Planning. *Transportation Element of the General Plan, Map E: Scenic Highways in the City of Los Angeles*. June 1998.

Section 3.0, Discussion of Environmental Impacts and Mitigation Measures, IX. Land Use and Planning, under b) Conflict with any applicable land use plan .... (including but not limited to .... specific plan ...) adopted for the purpose of avoiding or mitigating environmental effect, on page 3-35, replace the last 2 sentences with the following:

*Thus, the project is not anticipated to affect any land uses along or near the proposed alignment, or conflict with any General Plan or Specific Plan (e.g., San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan) designations or zoning ordinances. No impacts are expected and no mitigation is required.*

Section 3.0, Discussion of Environmental Impacts and Mitigation Measures, XII. Population and Housing, under b) Displace substantial numbers of existing housing, necessitating the construction or replacement housing elsewhere, on page 3-45, replace the first sentence with the following:

*The construction and operation of the proposed project would occur within public street rights-of-way and open space areas, and staging areas would be located at existing nearby LADWP facilities or vacant/undeveloped lots along the alignment, such as the lot adjacent to the Hansen Dam Sports Complex, which is currently being leased to Valley Crest for tree storage.*

Section 3.0, Discussion of Environmental Impacts and Mitigation Measures, XV. Transportation and Traffic, under a) Cause an increase in traffic that is substantial .... (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections), on page 3-51, replace the first bullet with the following:

- *Staging equipment for both the open trench and jacking method would occur off-street. Possible staging areas include vacant/undeveloped parcels along the alignment, such as the lot adjacent to the Hansen Dam Sports Complex, which is currently being leased to the Valley Crest Tree Company for tree storage, and at the LADWP VGS site. With staging areas off-street, the equipment would not cause additional disruptions to traffic flow during the construction period.*

#### **Additions to Proposed Project:**

The following features have been added to the proposed project. Incorporation of these features does not create any notable impact. nor are the features necessary to mitigate or avoid significant effects. The features shall be added to the proposed project's Construction Specifications:

- The recreation trail affected by construction under Foothill Boulevard to Clybourn Avenue shall be restored.

- Surface suitable for vehicular access and a natural surface equestrian trail on Conover Fire Road shall be maintained.
- To avoid potentially sensitive habitat area, the area adjacent to the proposed tank site shall be delineated by a biologist prior to construction. Tank excavation and grading activities shall include a biological monitor. The biological monitor shall be present on the site, as necessary, to verify that vegetation removal, clearing, grading, and excavation activities are restricted to the proposed work limits.
- There shall be restoration of habitat disturbed by construction of the tank or disturbed by any staging areas. Habitat disturbed by tank construction shall be replaced with native forbs, grasses, bushes and trees, as appropriate.
- Any retaining walls or engineered slopes in the area surrounding the proposed tank site shall be screened or disguised.
- LADWP shall work with the Angeles National Golf Course (ANGC) and Regional Water Quality Control Board, as applicable, to determine if additional sampling parameters need to be added to the ANGCs water quality monitoring program because of the use of reclaimed water.
- LADWP shall coordinate with the US Forest Service and the City of Los Angeles Fire Department regarding the location of the proposed storage tank on Conover Fire Road to ensure that emergency access is maintained.

## 6.0 Mitigation Monitoring and Reporting Program

The following mitigation measures and a program for their implementation and monitoring are proposed.

Potential Impact		Recommended Mitigation	Period/Method of Implementation	Implementation Monitor
<p><b><u>Cultural Resources:</u></b> Trenching activities for pipeline installation have the potential to encounter significant archaeological resources.</p>	M-1	All trenching along Foothill Boulevard between the eastern boundary of the Lake View Terrace Recreation Center (where it intersects the north side of Foothill Boulevard) and Brainard Avenue shall be monitored by a qualified archaeologist. In the event archaeological resources are discovered during excavation or construction, activity shall cease until the qualified archaeologist can assess the potential significance of such finds and/or remove the items. If significant, mitigation would consist of avoidance or data recovery.	Construction	LADWP Water Resources Business Unit
<p><b><u>Cultural Resources:</u></b> Trenching activities for pipeline installation and excavation for the booster pump station and storage tank have the potential to encounter significant paleontologic resources.</p>	M-2	All trenching in the Monterey Formation and the older Pleistocene Alluvium shall be monitored by a qualified paleontological monitor. In the event paleontologic resources are discovered during excavation or construction, construction activities shall cease until they can be removed by the paleontologist. All recovered specimens shall be prepared to the point of identification and curated in an accredited museum repository. A report of findings will be prepared by the paleontologist and submitted to the Lead Agency.	Construction	LADWP Water Resources Business Unit

Potential Impact		Recommended Mitigation	Period/Method of Implementation	Implementation Monitor
<p><b><u>Cultural Resources:</u></b> Trenching activities for pipeline installation have the potential to disturb human remains.</p>	M-3	<p>All trenching between Foothill Boulevard between the eastern boundary of the Lakeview Terrace Recreation Center (where it intersects the north side of Foothill Boulevard) and Brainard Avenue shall be monitored by a qualified archaeologist. In the event human remains are encountered during excavation or construction, activity in the area of the find shall cease, and the County coroner shall be contacted. The County Coroner shall assess the find, and advise whether the remains are of modern or prehistoric origin. If modern, the Coroner will assume jurisdiction. If prehistoric, the Coroner will contact the Native American Heritage commission in accord with Section 7050.5 of the Health and Safety Code so that the requirements of Section 5097.98 of the Public Resources Code can be implemented.</p>	Construction	LADWP Water Resources Business Unit
<p><b><u>Noise:</u></b> Construction activities have the potential to create a significant impact on adjacent noise sensitive uses and have the potential to create a substantial temporary increase in ambient noise levels in the project vicinity above levels existing without the project.</p>	M-4	<p>All construction equipment, stationary and mobile, shall be equipped with properly operating and maintained muffling devices.</p>	Pre-construction and Construction	LADWP Water Resources Business Unit



Potential Impact		Recommended Mitigation	Period/Method of Implementation	Implementation Monitor
	M-5	Use noise control devices, such as equipment mufflers, enclosures, and barriers as technically feasible or practicable.	Pre-construction and Construction	LADWP Water Resources Business Unit
	M-6	Stage construction operations as far from sensitive noise uses as possible.	Pre-construction and Construction	LADWP Water Resources Business Unit
	M-7	Effective communication with the local residents shall be maintained during construction including keeping them informed of the schedule, duration, and progress of construction to minimize public complaints regarding noise levels.	Pre-construction and Construction	LADWP Water Resources Business Unit

## **7.0 Comment Letters and Response to Comments**

On January 29, 2004, the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) was released for public review (Final MND Attachment C). A Notice of Availability/Notice of Intent (Notice) was sent to 1,200 addresses along the proposed project alignment. The Notice provided information on the project's location, description of the proposed activities, public review period and locations where the document could be viewed and/or person to contact if additional information was required. A Notice was also published in the Los Angeles Times on January 29<sup>th</sup>. The entire IS/MND was available on the LADWP web site, as well as in hard copy form at the Sun Valley Branch Library and Council District 2 and 6 field offices. The comment period was originally scheduled to close on February 27, 2004.

As a result of the public notification, several stakeholder meetings were held and additional information generated to discuss public questions and concerns. Refer to Attachment B of the Final MND for a detailed description of the public outreach subsequent to the release of the IS/MND for public review.

In order to provide additional time for public comments potentially generated by the expanded public outreach, the public review period was extended to July 21, 2004. A total of 35 comment letters were received during the 175 day public review period. Attached is a matrix listing of the individuals who submitted written comments and environmental issues raised. Following the matrix are copies of the comment letters and LADWP's response to those comments.

	Concerned About the Impacts of the Use of Recycled Water	Requested the Preparation of an EIR	Proposed the Use of Lopez Canyon as an Alternative Project Location	Concerned with Accuracy/Thoroughness of Information in MND	Concerned About the Impacts of Construction Activities	Concerned About Aesthetics, Safety or Location of Proposed Tank	Requested/Expressed Concern Over Notification of Public Agencies	Concerned About Community Notification/Requested Extension of Comment Period	Concerned that Existing Regulations/Plans Will Not Be Adhered To	Concerned About the Cumulative Significance of Project Impacts	Concerned About Project Funding/That Costs to LADWP Are Not Justified	Supports the Beneficial Use of Recycled Water/ Would Like to Use Recycled Water at Their Facility	Provided Agency Guidance Regarding Construction or Permitting	Concerned that Project Will Encourage Increased Local Development
Agnew	X	X	X								X			
Baumann (1)	X	X		X	X			X		X				
Baumann (2)			X			X	X		X					
Beeson	X	X	X			X								
Benson (1)				X	X	X	X	X	X	X				
Benson (2)	X	X	X											
Bowling						X								
Bronner	X	X			X									
Brown		X		X		X								
Buswell, California Department of Transportation													X	
Clark	X	X					X							
Cole								X						
Drucker	X	X	X	X	X									
Eick, Shadow Hills Property Owners Association	X	X		X		X	X		X		X			
Garrett, Natural History Museum of Los Angeles County					X	X	X							
Ghezzi	X	X	X		X									

	Concerned About the Impacts of the Use of Recycled Water	Requested the Preparation of an EIR	Proposed the Use of Lopez Canyon as an Alternative Project Location	Concerned with Accuracy/Thoroughness of Information in MND	Concerned About the Impacts of Construction Activities	Concerned About Aesthetics, Safety or Location of Proposed Tank	Requested/Expressed Concern Over Notification of Public Agencies	Concerned About Community Notification/Requested Extension of Comment Period	Concerned that Existing Regulations/Plans Will Not Be Adhered To	Concerned About the Cumulative Significance of Project Impacts	Concerned About Project Funding/That Costs to LADWP Are Not Justified	Supports the Beneficial Use of Recycled Water/ Would Like to Use Recycled Water at Their Facility	Provided Agency Guidance Regarding Construction or Permitting	Concerned that Project Will Encourage Increased Local Development
Grossman, Pacoima Beautiful	X	X	X	X	X									
Hake-Church			X	X		X								
Hanson	X	X		X										
Harder	X	X	X	X	X									
Harding	X	X												
Johnson, Memorial Park and Mortuary												X		
Kruger	X	X	X	X		X	X							
Leu	X		X	X										
Markes	X	X												
McGregor		X	X											
O'Keefe, CA Department of Health Services												X	X	
Parkin	X	X	X	X	X									
Petrinka (1)	X							X						X
Petrinka (2)		X												
Sekulic	X	X	X											
Tarnowski		X			X									
Whitakes	X	X		X										
Woods, LA County Public Works	X													
Yore	X													



## Edge Quest, Inc.

Maker of Mozo - Oben - Maya

12424 Montague St., Suite 130 Pacoima, CA 91331

Ph: (818) 834 - 3343 Fax: (818) 834 - 8166

Website: [www.mozoshoes.com](http://www.mozoshoes.com) Email: [mozoshoes@earthlink.net](mailto:mozoshoes@earthlink.net)

April 13, 2004

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

Subject: Hansen Area Water Recycling Project

Dear Mr. Holloway,

We are writing to you because we are concerned citizens and homeowners in the Hansen Dam area. Firstly, I would like to point out that the city should not be using taxpayer money to fund a project for private enterprise.

The area that is proposed for this project is an extremely sensitive and rare desert ecosystem. The aquifer is also greatly endangered by the runoff from this project. This area should be protected and preserved in its natural state for future generations not destroyed by a construction staging area and pipeline for recycled wastewater.

There are many health hazards in recycled wastewater, (including hundreds of DBPs) that were not recognized several years ago rendering any previous studies conducted by the golf course's EIR obsolete. The high content of salt and boron found in recycled wastewater might not be harmful to grass, but it damages native plants, trees and shrubs. Trace amounts of residual medications could very well harm the animals that live in the area, not to mention the humans that consume the wastewater that leaches into the pristine aquifer.

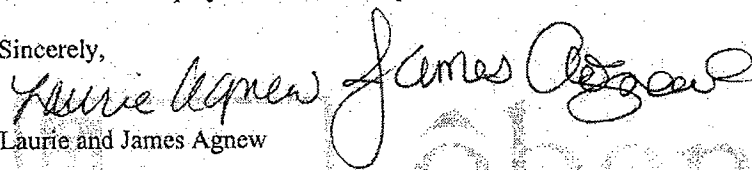
Please take into consideration that the professionals in the recycled wastewater industry are not unbiased when they downplay the hazards or downplay news items. For example, the recent discovery of residual medications in the aquifer beneath the city of Tucson (their aquifer is now contaminated as the result of using recycled wastewater to irrigate golf courses and school yards). Currently the water in the Tujunga/Hansen Dam is uncontaminated. This water source provides the water to 1/7<sup>th</sup> of the population of Los Angeles.

I urge you to please insist that a FULL EIR be done for the Hansen Dam Wastewater Recycling Program, so that another pristine area is not contaminated. Clean water is a very precious commodity. Please help it remain that way for our children. It seems that it is an unnecessary risk to push the Hansen Dam Recycling Water Program forward until technology has caught up with this new awareness of the risks and hazards.

The Lopez Landfill is a much better candidate for this project. The landfill is high above the water table, it is lined to prevent water leakage and it provides the ideal laboratory environment for monitoring the long-term result of recycled water irrigation. In addition, I would like to point out that the infrastructure is already in place to get the water up to the landfill (pumping station, pipe, IMG tank). This solution would also save tax dollars that could and should be used elsewhere in our city.

There is so very much at stake in terms of environmental health and human health that a FULL EIR should definitely be done before this project is allowed to proceed.

Sincerely,

  
Laurie and James Agnew





ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Mr. and Mrs. James Agnew  
11600 Orcas Avenue  
Lake View Terrace, CA 91342

Dear Mr. and Mrs. Agnew:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

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Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to the enclosed letter for actual comment text):

**Comment 1:** We are writing you because we are concerned citizens and homeowners in the Hansen Dam area. Firstly, I would like to point out that the city should not be using taxpayer money to fund a project for private enterprise.

**Response:** Neither the city nor the Los Angeles Department of Water and Power (LADWP) is funding a project for a private enterprise. As stated in the IS/MND, the Hansen Area Water Recycling Project (proposed project) is a public project that is proposed to service facilities in the Hansen area, including the Hansen Dam Recreation Area (a public facility) and the Angeles National Golf Club (a private development open to the public). LADWP, as well as the State of California, is encouraged to develop an alternative water program that includes public education, conservation, and use of recycled water. The proposed project is part of this program and is proposed to distribute recycled water to users, whether public or private, who are encouraged to look at using recycled water to preserve other limited water supplies such as drinking water.

**Comment 2:** The area that is proposed for this project is an extremely sensitive and rare desert ecosystem. The aquifer is also greatly endangered by the runoff from this project. This area should be protected and preserved in its natural state for future generations not destroyed by a construction staging area and pipeline for recycled wastewater.

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Telephone: (213) 367-4211 Cable address: DEWAPOLA



**Response:** The proposed project would not directly discharge into any local drainage or the groundwater. Water delivered to the two proposed customers for the project, the Hansen Dam Recreation Area (HDRA) and the Angeles National Golf Club (ANGC), would be used for irrigation of turf areas only.

ANGC is a state of the art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their Conditional Use Permit (CUP) For example, Condition 28 requires monitoring of local surface water and groundwater quality conditions before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires the monitoring and mitigation of water quality and quantity concerns for Tujunga Ponds. ~~Condition 138 says the golf course shall be designed to maximize infiltration and minimize runoff.~~ And finally, Condition 139 requires the golf course develop and implement a water quality monitoring program.

Additionally, under normal operating conditions, all water being used for irrigation at ANGC will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a subsurface drainage system beneath the putting green, tees, and various areas in roughs and fairways is designed to collect and convey on site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all water quality parameters are met.

The HDRA uses Best Management practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File 166080) as required by the California State Assembly Bill AB325, to ensure local water quality and reduce potential runoff.

Although water use is minimized at both of these facilities, it is assumed, and understood in the development of recycled water irrigation regulations, that some amount of water movement beyond the turf root system into the groundwater is expected. The turf root system and soil matrix would effectively filter many potential contaminants as the water percolates into the groundwater. For example, an estimated 90 percent of nitrogen is removed from recycled water during infiltration, and preliminary research indicates nearly complete removal of many pharmaceuticals during groundwater infiltration. The small volume of recycled water, or recycled water mixed with potable water, that is expected to pass through the turf root system to infiltrate into



the groundwater from these facilities, when mixed with large existing groundwater supplies, is expected to have a minimal effect on the drinking water supply. Compliance with existing state and federal regulations regarding recycled water and user facility conditions would ensure a less than significant impact on water quality in the aquifer from the irrigation water that would be delivered by the proposed project. LADWP will not utilize the I-210 Wheatland exit as a staging area. As local community members have suggested, an alternate staging area in close proximity has been proposed. This new staging area is adjacent to the Hansen Dam Sports Complex and is currently being leased to the Valley Crest Tree Company for tree storage. This lot is not considered to be a sensitive area. LADWP proposes to use this site instead of the I-210 Wheatland exit site. If this site is unavailable, then LADWP proposes to use another site in close proximity to the proposed project alignment but not the I-210 Wheatland exit site.

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Construction of the pipeline portion of the proposed project would occur within public-street right-of-ways, which is not considered to be sensitive. By limiting the construction footprint to within existing public street right-of-ways, direct impact to habitat adjacent to or close to the road will be avoided. As a linear infrastructure improvement project in a developed area, construction impacts would be temporary and transitory in nature.

Potential impacts on sensitive biological resources are further described in Appendix B of the IS/MND (Biological Resources Technical Memorandum).

**Comment 3:** There are many health hazards in recycled wastewater (including hundreds of DBPs) that were not recognized several years ago rendering any previous studies conducted by the golf course's Environmental Impact Report (EIR) obsolete. The high content of salt and boron found in recycled wastewater might not be harmful to grass, but it damages native plants, trees, and shrubs. Trace amounts of residual medications could very well harm the animals that live in the area, not to mention the humans that consume the wastewater that leaches into the pristine aquifer.

**Response:** The proposed project does not rely on the ANGC's EIR for any part of the environmental review process. The IS/MND for the Hansen Area Water Recycling Project satisfies the requirements for environmental evaluation under the California Environmental Quality Act (CEQA).

As addressed in the previous response, the use of the recycled water for irrigation of the HDRA and ANGC would be closely monitored and administered to ensure local water quality and reduce runoff. In addition, ANGC includes preserve areas of native plants, and mitigation (Measure 40) that specifically indicates that turf areas shall be

graded to direct drainage away from the preserve areas. Furthermore, mitigation Measure 41 approved as part of the ANGC project specifically indicates that "...as designed, there should be no movement of water from the golf course to the preserve. Precisely controlled irrigation systems will minimize runoff of irrigation waters. All drainage is away from the preserve so that even during storm events no runoff should reach the preserve from the golf course area." Additionally, ANGC would have the ability to blend potable water with recycled water in their irrigation system to control water quality as necessary. As the use of recycled water would be confined to irrigated areas and incidental runoff would be minimal, the salt and boron content of the recycled water is not expected to impact local native species.

Regarding human health hazards, to protect public health and safety, the State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of the recycled water facilities. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. Additionally, the Los Angeles Regional Water Quality Control Board implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are protected. Recycled water proposed for distribution in this project would be required to meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment, including filtration and disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable recycled water quality standards.

In addition, as part of the City's detailed monitoring of its water quality, in 2001, LADWP tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including the Tillman Water Reclamation Plant. No drug residues were detected in any of the samples.

**Comment 4:** Please take into consideration that the professionals in the recycled wastewater industry are not unbiased when they downplay the hazards or downplay news items. For example, the recent discovery of residual medications in the aquifer

Mr. and Mrs. James Agnew  
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beneath the city of Tucson (their aquifer is now contaminated as the result of using recycled wastewater to irrigate golf courses and school yards). Currently, the water in the Tujunga/Hansen Dam is uncontaminated. This water source provides the water to 1/7<sup>th</sup> of the population of Los Angeles. I urge you to please insist that a full EIR be done for the Hansen Dam Wastewater Recycling Program, so that another pristine area is not contaminated. Clean water is a very precious commodity. Please help it remain that way for our children. It seems that it is an unnecessary risk to push forward until technology has caught up with this new awareness of the risks and hazards.

**Response:** The San Fernando Groundwater Basin is a large aquifer with regions of differing water quality. In general, the groundwater quality is within the recommended limits of the primary and secondary drinking water standards. LADWP as the major water supplier in Los Angeles has a commitment to maintaining the reliability of the City's potable water supply, which includes water from groundwater sources. As with recycled water, there are existing monitoring programs that ensure quality of the groundwater is maintained. All uses of recycled water will be in strict compliance with directives issued by state and local health agencies.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

**Comment 5:** The Lopez Landfill is much better candidate for this project. The landfill is high above the water table, it is lined to prevent water leakage and it provides the ideal laboratory environment for monitoring the long-term results of recycled water irrigation. In addition, I would like to point out that the infrastructure is already in place to get the water up to the landfill (pumping station, pipe, 1 MG tank). This solution would also save tax dollars that could and should be used elsewhere in our city.

**Response:** Lopez Canyon Landfill (LCL) is not being proposed as a customer as part of this project. Supplying recycled water to LCL would require the development of a system with sufficient hydraulic capacity to serve the water demand at adequate pressure. The HDRA and the Angeles National Golf Club (ANGC) are physically situated at elevations and locations that can be immediately served by utilizing the proposed pumping station at the Valley Generating Station to lift the water to the proposed storage tank at a hydraulic grade of approximately 1,405 feet. Trying to use a single pump station at Valley Generating Station to pump to the top of LCL would result in pressures too great for service at lower elevations such as at HDRA.

The existing pump station at LCL could be used to pump the water to Lopez Canyon Landfill if the LCL pipe system were redesigned so that irrigation water and industrial

water would be completely separated from potable water uses; however, operating the LCL pump station without the proposed storage tank at ANGC would result in a system of two pump stations located in series without a storage tank. This type of system has the potential to cause cavitation of the pumps or pressure surges throughout the recycled water distribution scheme. To serve the LCL, the water would need to be pumped from the proposed storage tank to the existing LCL tank located on top of the landfill.

If a future project were to propose to extend a recycled water pipeline to LCL, the proposed project's pump station and storage tank would provide a system that (1) could operate at pressures which could continue to serve customers at lower elevations and (2) would have the storage capacity to help provide adequate suction pressure for the existing LCL Pump Station to operate without causing cavitation of the pumps or pressure surges. Any proposed future project would undergo an environmental evaluation as required under the CEQA.

**Comment 6:** A full EIR should definitely be done before this project is allowed to proceed.

**Response:** The CEQA has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an Initial Study (IS). This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies a Mitigated Negative Declaration (MND). If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an EIR.

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, a MND was prepared and publicly distributed for review and comment.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

Mr. and Mrs. James Agnew  
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Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

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Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez



February 25, 2004

Los Angeles Department of Water and Power  
Environmental Affairs,  
Attn: Charles Holloway, Supervisor of Environmental Assessment  
City of Los Angeles  
111 North Hope Street Room 1044  
Los Angeles, CA 90012

State Clearing House - NOT ON FILE  
Initial Study/Proposed Mitigated Negative Declaration  
HANSEN AREA WATER RECYCLING PROJECT WP-038-04  
January 2004

PUBLIC REVIEW COMMENT LETTER

Having reviewed the IS/MND, my opinion is that this negative declaration is inadequate, and that a full environmental impact report (EIR) needs to be done for this project.

I have grave concerns about the project:

- ⇒ I am concerned with what I perceive to be a "rush" to move this project forward, without adequate dissemination of information, public input, agency input, and consultation with appropriate environmental protection entities.
- ⇒ I am disturbed by the possibility that our community has been subjected to a "white-wash" with regards to this project, and only partial information shared, while many facts were withheld from us.
- ⇒ Numerous geographical and logistical inaccuracies within the IS/MND suggest that the authors did not do their homework and were unfamiliar with the area.
- ⇒ I am concerned by the IS/MND's failure to fully and comprehensively take into account environmental impact on adjacent wildlife areas and corridors, including areas inhabited by no less than four (4) Federally Registered Endangered Species.
- ⇒ I am concerned by inadequacies of the IS/MND in failing to take into account cumulative affects of their project in relation to the surrounding community and other construction projects going on in the same general area during the same general time period.
- ⇒ I am alarmed by the IS/MND's proposal to turn the area south of the 210's Wheatland exit into a staging area. The fact that sensitive habitat (adjacent to the County's Big Tujunga Mitigation Bank), would be proposed for this use reinforces my perception that the authors of the EIR did not do their homework and were very unfamiliar with this area and it's environmental concerns.

What disturbs me most is that the IS/MND treats the laying of the pipeline as if it were just an isolated construction project without any other ramifications -- as if the end product (recycled water) were not part of the equation. **Clearly, this is putting cart before the horse.** Until all scientific evidence and testing proves that the end product (recycled water) will be safe for the uses which the city intends to put it, not one foot of pipe should be laid.

The jury is still out on the project's end-product. Will this water be safe for use, or not? The Department of Sanitation says it is, but they have millions of dollars at stake to lose unless this project moves forward quickly. Other sources I've consulted have identified grave health concerns, including the inadequacy of the tertiary process for producing water that is safe for humans to drink or have close contact with, and the issue of residual medications, which survive the tertiary process and even survive ground filtration. Big Tujunga Wash is the primary re-charge for the Northeast San Fernando Valley Aquifer, and we cannot afford to further compromise this vital water source.

I strongly object to millions being spent on constructing a pipeline, until there is guarantee that the end result (recycled water) will be usable for the purpose it is intended. **A full EIR is needed**, and that EIR needs to address all water quality concerns related to how recycled water may affect all aspects of the environment and underground water resources. **The EIR also needs to detail how this project will protect the surrounding environment from spillage in the event of a major earthquake.**

Thank you,  
Debra Baumann  
PO Box 188, Sunland CA 91041  
818-486-0712









ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Debra Baumann  
113366 Orcas Avenue  
Lake View Terrace, CA 91342

Dear Ms. Baumann:

**Subject:** Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to the enclosed letter for actual comment text):

**Comment 1:** Having reviewed the IS/MND, my opinion is that... a full Environmental Impact Report (EIR) needs to be done for this project.

**Response:** The California Environmental Quality Act (CEQA) has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an Initial Study (IS). This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies a Mitigated Negative Declaration (MND). If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an EIR.

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, an MND was prepared and publicly distributed for review and comment.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

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

Ms. Debra Baumann  
Page 2  
October 18, 2005

**Comment 2:** I am concerned with what I perceive to be a “rush” to move this project forward, without adequate dissemination of information, public input ... consultation with appropriate environmental protection entities.

**Response:** Section 1.7 of the IS/MND specifies the broad timeline anticipated for project completion. It states, “If approved, the construction of the proposed project is anticipated to commence in November 2005 and would be completed by 2008.” This timeline does not reflect a rush to complete construction nor does it presume a truncated timeline that would prevent consultation with the appropriate environmental protection entities.

Under CEQA Section 15073(a), when a proposed “mitigated negative declaration and initial study are submitted to the State Clearinghouse for review by state agencies, the public review period shall not be less than 30 days, unless a shorter period is approved by the State Clearinghouse.” The Los Angeles Department of Water and Power (LADWP) initially sent the IS/MND for public review from January 29, 2004 to February 27, 2004. Following requests by the public and Council District 2, LADWP extended the public review and comment period until July 21, 2004, for a total of 175 days of circulation. This does not reflect a timeline that is rushed.

Following public review guidelines in the CEQA Guidelines, as specified in Section 15073(d), LADWP submitted “copies of the proposed negative declaration or mitigated negative declaration to the State Clearinghouse for distribution to state agencies.” The State Clearinghouse then provided a copy for review to the following responsible state agencies during the IS/MND public review period: Resources Agency; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 4; Native American Heritage Commission; State Lands Commission; Department of Health Services. This information is available through the CEQANet Database under State Clearinghouse Number 200401129.

The comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

**Comment 3:** I am disturbed by the possibility that community has been subjected to a “white-wash” with regards to this project, and only partial information shared, while many facts were withheld from us.

**Response:** The IS/MND was prepared and distributed in accordance with CEQA, which was passed into law for the purpose of presenting a comprehensive, multidisciplinary impact analysis regarding the environmental effects of the proposed action. Another objective of CEQA is to disclose to the public, as well as decision makers and agencies, the potential environmental effects. As to the comment that "...only partial information was shared, while many facts were withheld from us," no specifics are given to respond. The IS/MND includes all the information about the proposed project and reasonably foreseeable potential impacts that the proposed project could have on the environment.

In addition to the publication and circulation of the IS/MND for the proposed project, LADWP has participated in six community meetings during the public comment period, which included four visits to local Neighborhood Council meetings and two additional visits with community members and other groups. At these meetings, LADWP, has provided information, listened to comments, and answered questions regarding the proposed project.

As LADWP is a public agency, no information was, or is being, withheld regarding the proposed project. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

**Comment 4:** Numerous geographical and logistical inaccuracies within the IS/MND suggest that the authors did not do their homework and were unfamiliar with the area.

**Response:** No examples of "numerous geographical and logistical inaccuracies within the IS/MND" were given in the commenter's letter that could be either responded to or addressed. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

**Comment 5:** I am concerned by the IS/MND's failure to take into account environmental impact on adjacent wildlife areas and corridors, including areas inhabited by no less than four (4) federally Registered Endangered Species.

**Response:** In Section 3.0, Discussion of Environmental Impacts and Mitigation Measures, IV. Biological Resources, of the IS/MND starting on page 3-16, the potential environmental impacts of the construction and operation of the proposed project on biological resources is adequately addressed. As stated in IV. Biological Resources, a detailed biological resources technical memorandum was prepared and included as Appendix B of the IS/MND. Appendix B provides details of the survey methods, survey results with a focus on vegetation types, wildlife populations and movement patterns (wildlife corridors), special status vegetation types, plant and wildlife species either

known or potentially occurring within the area potentially affected by the proposed project, and an analysis of impacts associated with the construction and operation of the project. Regarding federally Registered Endangered Species, Appendix B determined that fourteen (14) special status plant species and fourteen (14) special status wildlife species have been previously identified in the project region, or have some potential to occur in the project area. Because the areas proposed for construction and operation are areas historically or currently disturbed, none of these plant/wildlife species were determined to be expected to occur. In areas of construction and operation where potential habitat exists (e.g., proposed tank site and staging area at I-210/Wheatland), the proposed project footprint would be placed to avoid the areas with potential to support these species, therefore, no significant impacts to sensitive species are anticipated to occur.

**Comment 6:** I am concerned by inadequacies of the IS/MND in failing to take into account cumulative affects of the project in relation to surrounding community projects going on in the same general area during the same general time period.

**Response:** Section XVII of the IS/MND addresses potential cumulative affects associated with the combination of the proposed project and other projects occurring in the local area. As described therein, two non-LADWP projects have been identified in close proximity to the proposed alignment: an international church complex located south of Foothill Boulevard and north of I-210 near the eastern end of the Foothill Boulevard segment of the proposed alignment and the Maclay New Primary Center located near the intersection of Glenoaks Boulevard and Oxnard Street. Based on the nature and timing of those projects, no significant cumulative impacts are expected to occur. The subject section also discusses the potential for cumulative impacts to occur from other possible projects. The proposed project, being primarily a linear infrastructure improvement project with impacts that will be temporary and transitory in nature, is not expected to cause impacts that are cumulatively considerable. It should also be noted that certain policies and procedures such as coordinating construction haul route plans through the City of Los Angeles Department of Transportation (LADOT) would help to coordinate the construction traffic activities of multiple projects, should they occur in proximity to each other, which would serve to mitigate potentially significant cumulative impacts.

**Comment 7:** I am alarmed by the IS/MND's proposal to turn the area south of the 210's Wheatland exit into a staging area. The fact that sensitive habitat (adjacent to the County's Big Tujunga Mitigation Bank) would be proposed for this use reinforces my perception that the authors of the EIR did not do their homework and were very unfamiliar with this area and it's environmental concerns.

**Response:** The IS/MND discussed possible location of staging areas based on currently disturbed areas adjacent to the proposed project alignment. The I-210/Wheatland exit is adjacent to a sensitive habitat, but not within one. LADWP will not utilize the I-210 Wheatland exit as a staging area. As local community members have suggested, an alternate staging area in close proximity to the proposed I-210/Wheatland exit has been proposed. This new staging area is adjacent to the Hansen Dam Sports Complex and is currently leased by Valley Crest Tree Company for tree storage. LADWP proposes to use this site instead of the I-210/Wheatland site. If this site is unavailable, then LADWP proposes to use another site in close proximity to the proposed project alignment but not the I-210/Wheatland site.

**Comment 8:** Disturbed that the IS/MND treats the laying of pipeline as if it was an isolated construction project without any other ramifications – as if the end product (recycled water) were not part of the equation. Not one pipe should be laid until all scientific evidence and testing proves that the end product (recycled water) will be safe for the uses which the city intends to put it.

**Response:** The IS/MND did analyze both the construction and operation of the proposed project. As stated in the IS/MND, beginning on page 3-31, “The water that the proposed project would supply would meet all applicable water quality standards.” Regarding the commenter’s claim that the IS/MND does not treat the ramifications of the end product (recycled water) as part of the equation, there are numerous health laws and water quality standards that regulate the quality of recycled water, as well as construction and operation of facilities and use sites relating to recycled water. In California, these laws comprise sections of the Health and Safety Code, Water Code, and California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. As stated in Title 22 regulations, recycled water that meets standards as stated in Section 60304 can be used for surface irrigation of such uses as food crops, parks, playgrounds, school yards, residential and freeway landscaping, golf courses, and cemeteries, just to name a few. The recycled water proposed to be distributed through the project facilities will meet all state and federal water quality criteria for recycled water supplies. The State Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. In addition to DHS’ strict requirements, requirements of the permitting agency, the California Regional Water Quality Control Board (RWQCB), must also be met. Therefore, as concluded in the IS/MND, no significant impacts to water quality are expected from the construction or operation of the proposed project and no mitigation is required.

Ms. Debra Baumann  
Page 8  
October 18, 2005

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez

# Tujunga Watershed

12 April 2004

Los Angeles Department of Water and Power  
Environmental Affairs,  
Attn: Charles Holloway  
111 North Hope Street, Room #1044  
Los Angeles CA 90012

CC: Los Angeles City Council  
Los Angeles Mayor James Hahn  
California Regional Water Quality Control Board  
California Environmental Protection Agency  
Natural Resources Defense Council

(SCH NOT ON FILE)  
Initial Study/Proposed Mitigated Negative Declaration  
HANSEN AREA WATER RECYCLING PROJECT WP-038-04  
January 2004

## PUBLIC REVIEW COMMENT LETTER

Dear Mr. Holloway:

After reading the project MND and related documents, and upon doing extensive background research, I have numerous grave concerns. Initially, my focus was on the IS/MND (which I address in detail later in this letter), but the more I delved into the environmental issues associated with this project, the more convinced I became that an MND was never appropriate for this project.

A full **Environmental Impact Report (EIR)** needs to be done for a project of this size and scope. A full EIR is more than justified, and indeed it is absolutely necessary, in my opinion.

On March 31, 2004, at a meeting between DWP project staff, Council District 2 staff, and local concerned citizens, DWP project manager Stephen Ott informed us that an EIR had been done already, and that it was an "Addendum EIR" to the original (Angeles National) Golf Course EIR. He had a copy of the document in hand, but did not offer to share its contents, and his department has not followed through with my request for a copy.

Regardless, an EIR that may have already been done as addendum to the Golf Course EIR is **not acceptable**, for multiple reasons:

- Lack of Public Disclosure (so far, our inquiries have been unable to locate a single person in the surrounding communities who was aware of any proposal to irrigate the golf course with recycled wastewater)
- Despite DWP claims that water used to irrigate the golf course will undergo "transevaporation" and will not mix with groundwater in "significant" quantities, there is strong evidence to refute this. As per our interviews with golf course professionals currently utilizing recycled wastewater on golf courses within Los Angeles city limits today, and as per the University of California Cooperative Extension study entitled "**The Use of Effluent Water for Turfgrass Irrigation**" (see [www.tujungawatershed.org](http://www.tujungawatershed.org) for link to full text), irrigating with recycled wastewater requires utilizing considerably **more water** (and fertilizer, and pesticides...) and, because of accumulation over time, the irrigated areas must be periodically "flushed" to wash away salt, boron and other residual chemicals. It would thus seem logistically

impossible to avoid contaminating the ground water, since the water table in the Tujunga Wash (beneath the golf course) is very shallow, and in fact rises to the surface at times.

- Downstream from the golf course is the Big Tujunga Wash Mitigation Bank, where millions of dollars have been invested for the purpose of maintaining a healthy population of native plants and wildlife. As per the above-mentioned UC Cooperative Extension study, the high salt, boron and other chemical content of recycled wastewater is very damaging to native plants, and indeed to virtually ANY plant life except turf which is regularly cut and the clippings removed, thereby reducing chemical build-up in the plant's tissues. Obviously, therefore, irrigation with recycled wastewater upstream could have a significant effect on this Mitigation area, and indeed on the entire Tujunga Wash ecosystem.
- As noted in the article "**Big Tujunga Wash – Unique in the World**" (see [www.tjungawatershed.org](http://www.tjungawatershed.org) for link to full text), the Tujunga Wash is home to a wide variety of fragile, rare or Federally Registered Endangered plants and animals. For animals in particular, irrigating with recycled wastewater within the Wash could pose grave health hazards during DRY times. The creatures of the Tujunga Wash are desert dwellers. They know how to forage for water, during even the driest drought season. But now this recycled water appears, a virtual oasis in the middle of this desert habitat. Imagine you are a lizard, or a Federally Registered Endangered Species like the Least Bell's Vireo, and there is a sprinkler head fifteen yards from your nest or den. Every night the grass around this sprinkler is soaked with water. Are you going to travel hundreds of yards to drink from a natural water source, like you used to do – or are you going to enjoy the amazing luxury of a water source next door? Most likely, you will begin drinking the nearby convenient recycled water – perhaps exclusively. Recycled waste water MAY be safe for humans, a comparatively hardy species. The quantities of residual medications (birth control hormone, insulin, antibiotics, human growth hormone, or steroids) in recycled water MAY be too small to harm humans (maybe). But how much human birth control hormone can a tiny bird absorb into its tissues before it is adversely affected? WHO HAS DONE THE STUDIES to examine this risk? **This is why a full-scale EIR is needed, one that takes into account CURRENT scientific knowledge and recent discoveries.**
- New Science: Recent learnings suggest that early optimism about the safety of recycled wastewater may have been sadly premature, as per U.S. Water News Online, "**Reclaimed wastewater... Uncertainties Must be Addressed**" (see [www.tjungawatershed.org](http://www.tjungawatershed.org) for link to full text).
- **City of Tucson's aquifer contaminated** - Residual Medications pose a significant health risk and are of grave concern, yet only now are scientists beginning to document and study their full effects in recycled wastewater. Per **The Recharge Report** (from the Groundwater Foundation, Vol 4, Issue 6, October 2003): "...based on a new study done in Tucson, **caution is in order.** US Geological Survey found human-excreted medications in the aquifer used for drinking water in Tucson. The medications apparently **were not stripped out of the wastewater** at sewage treatment plants before the wastewater was used to irrigate golf courses and school yards around Tucson." Quoted from U.S. Water News Online's report (see [www.tjungawatershed.org](http://www.tjungawatershed.org) for link to full text).
  - ⇒ see [www.tjungawatershed.org](http://www.tjungawatershed.org) for link to article about Lake Mead's contamination from residual medications in recycled wastewater.
  - ⇒ see [www.tjungawatershed.org](http://www.tjungawatershed.org) for link to article about residual medication contamination concerns in San Diego.
- **Unrecognized Environmental Pollutants** – the March 2004 issue of **Stormwater Runoff Water Quality Science/Engineering Newsletter** is devoted to (previously) Unrecognized Environmental Pollutants: "...there are a wide variety of chemicals that are introduced into domestic wastewaters that are being found in the environment. These include various chemicals (pharmaceuticals) that are derived from usage by individuals and pets, disposal of outdated medications in sewerage systems, release of treated and untreated hospital wastes to domestic sewerage systems, transfer of sewage solids ("biosolids") to land, industrial waste streams, releases from aquaculture of medicated feeds, etc. Many of these chemicals are not new chemicals. They have been in wastewaters for some time, but are **only now beginning to be recognized as potentially significant water pollutants.** They are largely unregulated as water pollutants." (see [www.tjungawatershed.org](http://www.tjungawatershed.org) for link to full text).
- DBP's - Also mentioned in the above article - "drinking water disinfection by-products" (DBP): Recently, "More than 200 previously unidentified DBPs have been identified for the first time."



For all the above reasons, I request that a FULL "Environmental Impact Report" (EIR) be done for the Hansen Area (waste) Water Recycling Project. I feel strongly that it would be irresponsible and reckless to court unnecessary risks to the environment of the Big Tujunga Wash, to the Mitigation Bank downstream from the golf course, to the health of current and future generations, and to the groundwater quality of the Northeast San Fernando Valley by pushing this project forward, until technology has caught up with this new awareness of the risks & hazards. Again, *previous studies have been rendered obsolete by new discoveries and knowledge.*

My fear is that the true effects of irrigating areas of the Big Tujunga Wash with recycled wastewater might go unrecognized for many years, until the chemical accumulation underground creates a plume, not unlike the percholate plumes that are currently spreading and contaminating areas north and east of Los Angeles. By the time such a plume has built up over time, to the point where it is measurable and its negative impact is truly known, it is impossible to simply "switch it off" – the damage is done, and may be irrevocable.

I fear for my health, for my family's health, for my neighbors' health, for the health of future generations, and I fear for the health of the unique environment of the Tujunga Wash (*the largest stand of alluvial fan scrub habitat remaining in the WORLD*). **A full E.I.R. is not unreasonable to demand**, knowing what is at stake.

Finally, continuing on the subject of scientific uncertainties associated with reclaimed wastewater, I strongly urge the DWP to consider first **piloting this project at the Lopez Canyon Landfill**, because:

- ⇒ It is high up and removed from the groundwater table;
- ⇒ The dump is designed and lined to prevent run-off from coming into contact with groundwater;
- ⇒ As a landfill, it is already under extensive regulatory oversight and it is already continuously monitored, which means that if there are any problems, they will be quickly identified;
- ⇒ Because of the extensive monitoring processes already in place at Lopez Landfill, it could provide an ideal **lab environment** in which to study the long-term effects of using recycled waste-water, and provide maximum "learnings" which would, in turn, make the eventual "roll-out" of recycled water into other parts of the city a safer and healthier proposition.
- ⇒ Infrastructure (pumping station, pipe and 1 million gallon storage tank) to send the water up the mountain to Lopez Landfill is already in place, therefore, sending the water to Lopez might bring the project in under schedule and under budget;
- ⇒ It would save the city 3 million gallons per month of drinking water that would otherwise be wasted on a landfill.

Meanwhile, while Lopez provides safe opportunity to use recycled wastewater without endangering a rare, fragile and valuable ecosystem or groundwater quality, Tillman will eventually receive the upgrades needed to make it a truly state-of-the-art facility that produces a safer product.

To quote Rachel Carson, author of "Silent Spring,"

*"We begin to feel an uneasy certainty that man is becoming too ingenious for his own good. We've had the scientific knowledge to anticipate this destructive chain reaction. Why haven't users and responsible bodies of government acted on this knowledge?"*

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Now, I will address specific concerns regarding the project's MND.

#### **INADEQUATE PUBLIC NOTICE**

- I was unable to find this project on the CEQA website database. Was this project registered with CEQA? Does the DWP have another EIR or related document with a different project name or CEQA database identification?
- The Tujunga Watershed Council has asked residents along the project route whether they received notification of the project, and we found the results to be few & sporadic.

This would significantly alter the conditions and specifications required by Conditions set to mitigate the impacts of the golf course from which this project cannot be considered separately.

The 1MG tank will be prominently visible on the upslope area degrading the visual character from the Recreational Trail and community of Riverwood Ranch. The tank appears to be tentatively located in an area near Eby Canyon that has also been the proposed route of a recreational trail. The view from the plateau and back to the San Gabriel Mountains would be completely dominated by an above ground tank.

Requested mitigation:

- Complete underground installation of tank
- Complete restoration of the habitat disturbed by construction of the tank including drainage benches above and below the proposed storage tank site (Pg3-54 XVI c)
- Complete restoration of the habitat disturbed by any staging areas
- No asphalt or gravel used on the route known as Conover Street
- No Concrete channelization of Eby Canyon from the tank site to the Tujunga Wash
- Retention or replacement of specimen native plants.

#### IV BIOLOGICAL RESOURCES

Would the project

**a) Have a substantial adverse effect, either directly or through habitat modifications on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

The MND does not address operation of the project even though the water will be used on a golf course and in the Hansen Dam Flood Control Basin directly above the open aquifer of the Tujunga Wash. The golf course is immediately upstream from the Big Tujunga Wash Mitigation Bank (a designated habitat for the federally listed Santa Ana Sucker. Operation of the golf course is contingent on well monitoring throughout the life of the installation. While construction of the pipeline may have no impact, these areas are protected and subject to 404 regulation. Other sources reviewed include the Southern California Mountains and Foothill Assessment (Stephenson and Calcarone, 1999)

I request that the lead agency contact the U.S. Department of Fish and Game regarding the impacts of the operation of the project.

**d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?**

**Potentially Significant Unless Mitigation Incorporated** There are three areas of concern directly impacted by the proposed construction.

1) Little Tujunga Bridge Crossing

This is an established wildlife corridor that supports the frequent migration of deer and other large mammals down to the fresh water in Hansen Dam. This opinion is supported by the 2002 EIR study completed for the Hansen Dam Soccer Complex (State Clearing House 2002021137 Pg 26 Wildlife Movement Corridors)

Mitigation Requested

- Allow for nocturnal passage of (large mammals) wildlife without obstruction for the period of construction.
- Follow up plan and habitat restoration to remove *Arundo donax* which may be spread and established in new areas due to excavation.
- Restoration of the Recreational Trail under Foothill Boulevard to Clybourn Avenue affected by construction.

2) Proposed Staging area south of Wheatland and Interstate 210 Freeway

This is a breeding and feeding area for Black Tailed Jackrabbits. Disturbance of this area by a staging area could result in significant adverse effects to wildlife within this project staging area and immediate vicinity. This Potentially Significant impact could be avoided by choosing an alternate staging area and noting that staging or parking of any kind in this area is prohibited at the Wheatland offramp.

#### Mitigation Requested

- The Osborne offramp be designated as the preferred construction transportation route and Sunland Boulevard offramp be designated as an alternate. Note to contractors that staging or parking of any kind is prohibited at the Wheatland offramp.

#### 3) Conover Fire Road and Tank construction area

The development of the tank location and 12 month construction cycle may permanently decrease use of the area as a local movement corridor and habitat area. This is an established portion of territory for deer, mountain lion and bobcat. See: Chambers Group list of Observed Species. This area is currently sparsely populated and an impact would mostly result from the increased noise and human presence during construction. The plateau above the Tujunga Wash provides grazing for prey animals and hunting areas for predators including a large population of raptors.

#### Requested Mitigation

- I request that the tank be installed underground.
- I request that the habitat disturbed by construction be restored with native forbs and grasses, bushes and trees (Including native oaks).
- I request that stormwater runoff be collected on site and a "bubbler" wildlife watering station be installed to entice wildlife to return to the site.
- I request that no concrete swales or channels be installed in the Habitat Preserve Area. Conditions CR-97-0469 CPC's 96-0243 CU and 96-0241 CUB Angeles National Golf Course
- I request that Conover Fire Road be resurfaced with decomposed granite or crusher fine limestone in conformance with trail construction standards acceptable to the Santa Monica Mountains Conservancy and the local Council District #2 Planning Office.
- I request that a minimum number of 24" box trees (Native species recommended by Santa Monica Mountains Conservancy) be planted at 25 foot intervals along Conover Street route from Foothill boulevard to the tank site and in Eby Canyon.
- Follow up plan and habitat restoration to remove *Arundo donax* (Giant Reed, and *Ricinus communis* (Castor bean) which may be spread and established in new areas due to excavation.

#### e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

**Potentially Significant Unless Mitigation Incorporated** The area from the intersection of Foothill and Osborne and the Los Angeles National Golf Course are within the boundaries of the following preservation and may conflict with mitigation proposed by the following EIRs and plans

- ⇒ Conditions of Use and Mitigation EIR SCH 1995051004 Canyon Hills Golf Course and 95-0286 CUC CU & VAC Conditions
- ⇒ The San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan Section 8 Ordinance 175736 effective February 8, 2004.
- ⇒ Rim of the Valley Corridor Proposed National Park and Rim of the Valley Trail Network Lead Agency City of Los Angeles Department of Engineering and Department of Recreation and Parks.
- ⇒ Mitigation Required for Hansen Dam Soccer Complex SCH 2002021137 February 2002
- ⇒ Master Mitigation Plan for the Big Tujunga Wash Mitigation Bank Lead Agency County of Los Angeles Department of Public Works- Quarterly Water Quality Monitoring Reports and interested parties.

#### f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional or state habitat conservation plan?

There are over 370 Conditions for the Canyon Hills Golf Course in EIR SCH 1995051004 and contained in 95-0286 including a 200 acre Habitat Preservation Area dedication to the Santa Monica Mountains Conservancy. The Conover Fire Road and site of the 1MG Tank are within this area.

There are three areas of concern directly impacted by the proposed construction.

1) Little Tujunga Creek Crossing (unlined natural channel)

This is an established wildlife corridor that supports the frequent use by deer and other large mammals down to the fresh water in Hansen Dam. This opinion is supported by the 2002 EIR study completed for the Hansen Dam Soccer Complex (State Clearing House 2002021137 Pg 26 Wildlife Movement Corridors)

Mitigation Requested

- Allow for nocturnal passage of (large mammals) wildlife without obstruction for the period of construction.
- Follow up plan and habitat restoration to remove *Arundo donax* which may be spread and established in new areas due to excavation.
- Restoration of the Recreational Trail under Foothill Boulevard to Clybourn Avenue affected by construction.

2) Proposed Staging area south of Wheatland and Interstate 210 Freeway

This is a breeding and feeding area for Black Tailed Jackrabbits. Disturbance of this area by a staging area could result in significant adverse effects to wildlife within this project staging area and immediate vicinity. This Potentially Significant impact could be avoided by choosing an alternate staging area and noting that staging or parking of any kind in this area is prohibited at the Wheatland offramp.

Mitigation Requested

- The Osborne offramp be designated as the preferred construction transportation route and Sunland Boulevard offramp be designated as an alternate. Note to contractors that staging or parking of any kind is prohibited at the Wheatland offramp.

3) Conover Fire Road and Tank construction area

The development of the tank location and 12 month construction cycle may permanently decrease use of the area as a local movement corridor and habitat area. This is an established portion of territory for deer, mountain lion and bobcat. See: Chambers Group list of Observed Species. This area is not developed and an impact would mostly result from the increased noise and human presence during construction. The plateau above the Tujunga Wash provides grazing for prey animals and hunting areas for predators including a large population of raptors.

Requested Mitigation

- I request that the tank be installed completely underground.
- I request that the habitat disturbed by construction be restored with native forbs and grasses, bushes and trees (Including native oaks).
- I request that stormwater runoff be collected on site and a "bubbler" be installed to entice wildlife to return to the site.
- I request that no concrete swales or channels be installed in the Habitat Preserve Area. Conditions CR-97-0469 CPC's 96-0243 CU and 96-0241 CUB Angeles National Golf Course
- I request that the retaining walls and engineered slopes (described in section VI, GEOLOGY AND SOILS- iv. - Landslides) be entirely disguised to minimize the impact of their construction and the operation of the tank facility.
- I request that Conover Fire Road be resurfaced with decomposed granite or crusher fine limestone in conformance with trail construction standards acceptable to the Santa Monica Mountains Conservancy and the local Council District #2 Planning Office.
- I request that a minimum number of 24" box trees (Native species recommended by Santa Monica Mountains Conservancy) be planted at 25 foot intervals along Conover Street route from Foothill boulevard to the tank site and in Eby Canyon.
- I request follow up plan and habitat restoration to remove *Arundo donax* (Giant Reed, and *Ricinus communis*(Castor bean) which may be spread and established in new areas due to excavation.

**IX. LAND USE AND PLANNING-- WOULD THE PROJECT;**

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigation an environmental effect?

The proposed project is partially located (from the intersection of Osborne and Foothill Boulevard) within an area that is described by the Environmental Element of the City of Los Angeles General Plan (adopted in 2001) as a rural/agricultural area worthy of preservation. This is also reflected in the Sunland-Tujunga Shadow Hills Lake View Terrace Community Plan which describes this as an area predominantly zoned RA, RE and A. The area is contains a special Use "K" district overlay.

There are over 370 Conditions for the Canyon Hills Golf Course in EIR SCH 1995051004 and contained in 95-0286 including a 200 acre Habitat Preservation Area dedication to the Santa Monica Mountains Conservancy. The Conover Fire Road and site of the 1 Million Gallon Tank are within this area.

The San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan, Section 8, Ordinance 175736 effective February 8, 2004.

-Rim of the Valley Corridor Proposed National Park and Rim of the Valley Trail Network Lead Agency City of Los Angeles Department of Engineering and Department of Recreation and Parks.

I request that the project proposal be compared to determine if any conflicts exist.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

See above comment and request.

### XIII PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

During the three year construction period, Glenoaks Boulevard and Foothill Boulevard will be impacted. The ability to access intersecting streets, communities and public facilities may be limited to a single route via one of these two streets. Intersections and government facilities that have no other access and will possibly be isolated during construction that should be noted are:

- MTA Yard Corner of Branford and Glenoaks
- Entrance to Hansen Dam Golf Course Montague and Glenoaks
- Homes located beyond intersection of Kagel Canyon and Foothill
- Homes located beyond intersection of Gladstone and Foothill
- Access to Little Tujunga Canyon, Kagel Canyon, and Middle Ranch Communities and Homes and Angeles National Forest accessed at the intersection of Osborne and Foothill.
- Homes located beyond intersection of Clybourn and Foothill
- Valley View Vaulters, Worldwide Exotics Nursery and the Hansen Dam Equestrian Center located south of Orcas Avenue and Foothill
- Homes located south beyond the intersection of Christy Avenue and Foothill Boulevard
- Homes located on Palomino Ct north of Foothill Boulevard
- Mini Mall entrance located on Wheatland between Foothill Boulevard and the 210 Freeway
- Homes, Flood Control Debris Basin and Fire Road located north of the intersection of Esko Ave and Foothill Blvd
- Homes and Flood Control Debris Basin located in Oliver Canyon north of Foothill Blvd
- Homes and All Nations Church located at Foothill Place and Foothill Blvd

I request that special care be given along the route to never block these critical access points for extended periods of time. Access to these areas will be severely limited during the three year construction period and those suffering the impacts will receive no benefit or increased services from the project unless there is mitigation.

I request that the affected residents be notified by phone or fax at least 48 hours prior to construction and dates and times of construction and the duration in hours when access will be interrupted.

I request mitigation for the extreme inconvenience which will be in both the severity of blocked access and the duration of time (three years) . I request a natural surface recreational trail (including a landscaped buffer between the street and the trail) be constructed along the south side of Osborne Street from the intersection of Osborne and Glenoaks to the Hansen Dam Overlook in Council District #7 and along the north side of Foothill from the intersection of Osborne Street to Wheatland Avenue in Council District #2.

## XV. TRANSPORTATION/TRAFFIC

The proposed project is partially located (from the intersection of Osborne and Foothill Boulevard) within an area that is described by the Environmental Element of the General Plan (adopted in 2001) as a rural/agricultural area worthy of preservation. This is also reflected in the Sunland-Tujunga Shadow Hills Lake View Terrace Community Plan which describes this as an area predominantly zoned RA. There will be substantial impacts to transportation routes whose only ingress and egress is via Foothill Boulevard. These intersections are noted above in the Public Services Comment. Foothill Boulevard is not only a Major Class II Highway, it is the ONLY way to reach certain residences located along the route. Work along Foothill Boulevard will affect residents during the entire period of construction.

- I request that special care be given along the route to never block these critical access points for extended periods of time. Access to these areas will be severely limited during the three year construction period and those suffering the impacts will receive no benefit or increased services from the project unless there is mitigation.
- I request that the affected residents be notified by phone or fax at least 48 hours prior to construction and dates and times of construction and the duration in hours when access will be interrupted.
- I request mitigation for the extreme inconvenience which will be in both the severity of blocked access and the duration of time (three years) . I request a greenway and recreational trail (including a landscaped buffer between the street and the trail) be constructed along the south side of Osborne Street from the intersection of Osborne and Glenoaks to the Hansen Dam Overlook in Council District #7 and along the north side of Foothill from the intersection of Osborne Street to Wheatland Avenue in Council District #2.

## XVI. UTILITIES AND SERVICE SYSTEMS

**c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? Potentially Significant Unless Mitigation Incorporation.** This is a rural neighborhood with sufficient open space within the Tujunga Watershed to absorb storm water during all but the most significant storm events. There are no stormwater drainage facilities provided along much of the proposed alignment and surrounding vicinity. This includes an absence of curbs and gutters. The capacity of the stormwater drainage facilities is therefore limited to surface facilities and prone to entering private residences and driveways. Any dewatering during construction will impact as street runoff along the route before finally draining into the Tujunga Wash.

I request that dewatering be monitored to avoid water running for prolonged distances or into private residences along the proposed route.

## XVII. MANDATORY FINDINGS OF SIGNIFICANCE

**a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or pre history?**

**Potentially Significant Impact Unless Mitigated.** As noted in other sections, the impact areas are limited to 1) Little Tujunga Creek Crossing, 2) Proposed staging area at Wheatland south of Interstate 210 freeway and 3) Conover Fire Road and one acre Tank site. While these locations represent a fraction of the proposed route, they represent disruption of the only 3 passages from San Gabriel Mountains of the Angeles

National Forest to Hansen Dam, a permanent water source for large mammals. A one year disruption of the Black Tailed Jack Rabbit area at site 2) could possibly disrupt breeding and permanently affect population of that species. Site 3) will be under construction for over a year and is the location of a Habitat Preservation Area set aside for the benefit of numerous species and required to be dedicated to the Santa Monica Mountains Conservancy. All three sites provide a functional wildlife corridor that would be fragmented during construction.

Mitigation should be required

Requested Mitigation

- I request that the tank be installed completely underground.
- I request that the habitat disturbed by construction be restored with native forbs and grasses, bushes and trees (Including native oaks).
- I request that stormwater runoff be collected on site and a "bubbler" be installed to entice wildlife to return to the site.
- I request that no concrete swales or channels be installed in the Habitat Preserve Area.
- Conditions CR-97-0469 CPC's 96-0243 CU and 96-0241 CUB Angeles National Golf Course
- I request that the retaining walls and engineered slopes (described in section VI. GEOLOGY AND SOILS- iv. - Landslides) be entirely disguised to minimize the impact of their construction and the operation of the tank facility.
- I request that Conover Fire Road be resurfaced with decomposed granite or crusher fine limestone in conformance with trail construction standards acceptable to the Santa Monica Mountains Conservancy and the local Council District #2 Planning Office.
- I request that a minimum number of 24" box trees (Native species recommended by Santa Monica Mountains Conservancy) be planted at 25 foot intervals along Conover Street route from Foothill boulevard to the tank site and in Eby Canyon.
- I request follow up plan and habitat restoration to remove *Arundo donax* (Giant Reed), and *Ricinus communis* (Castor bean) which may be spread and established in new areas due to excavation.

**b) Does the project have impacts that are individually limited, but cumulatively considerable? Potentially Significant Impact Unless Mitigation Incorporation**

There are a substantial number of projects along the proposed route not undertaken by the LADWP as Lead agency. The construction timetables of these projects run concurrently with the time table for this project. Generated truck traffic and vehicular traffic associated with construction worker travel, as well as lane closures could elevate the impacts of concurrent construction unless coordinated.

Projects with already approved EIR's listed on the State of California Website that are expected to be funded, bid and started within the time frame of this project include:

- Hansen Dam Soccer Complex Phase II City of Los Angeles Department of Recreation & Parks SCH 2002021137 Feb 2002
- Sun Valley Watershed Management Plan County of Los Angeles Department of Public Works
- SCH 2002111051 October 2003
- Hansen Dam Master Plan and Environmental Impact Statement, LACDA, CA Corps of Engineers Los Angeles District - Various mitigation maintenance and construction
- Los Angeles Children's Museum City of Los Angeles, Bureau of Engineering SCH 20000041091 April 19 2000
- Canyon Hills Golf Course Clubhouse construction Angeles National Golf Club SCH 1995051004
- Possible reactivation of - Water Conservation and Supply Feasibility Study - Hansen Dam and Draft Environmental Impact Statement/Report U S Army Corps of Engineers Los Angeles District

Respectfully,



Debra Baumann  
11366 Orcas Avenue  
Lake View Terrace CA 91342  
818-486-0712







ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Debra Baumann  
113366 Orcas Avenue  
Lake View Terrace, CA 91342

Dear Ms. Baumann:

**Subject:** Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** After reading the project MND and related documents, and upon doing extensive background research, I have numerous grave concerns. Initially my focus was on the IS/MND but the more I delved into environmental issues associated with this project, the more convinced I became that an MND was never appropriate for this project. A full Environmental Impact Report (EIR) needs to be done for a project of this size and scope. A full EIR is more than justified, and indeed it is absolutely necessary in my opinion.

**Response:** The California Environmental Quality Act (CEQA) has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an Initial Study (IS). This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies an MND. If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an EIR.

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, an MND was prepared

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

Ms. Debra Baumann  
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and publicly distributed for review and comment. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 2:** On March 31, 2004, at a meeting between the Los Angeles Department of Water and Power (LADWP) and Council District 2 staff and local concerned citizens, LADWP project manager Stephen Ott informed us that an EIR had been done already, and that it was an "Addendum EIR" to the original (Angeles National) Golf Course EIR. He had a copy of the document but did not offer to share its contents and his department has not followed through with my request for a copy.

**Response:** The EIR Mr. Ott referred to was for the Angeles National Golf Club (ANGC) and not the proposed project. The proposed project does not rely on the golf course EIR. The proposed project is part of a recycled water use program that includes the proposed distribution of recycled water to users (whether public or private) that are encouraged to look at using recycled water to preserve other water supplies (such as drinking water). The EIR for the ANGC is a public document that is available from the Los Angeles City Planning Department.

**Comment 3:** Regardless, an EIR that may have already been done as addendum to the Golf Course EIR is not acceptable, for multiple reasons: Lack of Public Disclosure (so far, our inquires have been unable to locate a single person in the surrounding communities who was aware of any proposal to irrigate the golf course with recycled wastewater).

**Response:** As stated above, the proposed project is not evaluated as an addendum to an existing EIR. An IS/MND has been prepared that addresses the potential environmental impacts from the proposed project. Regarding public disclosure, a requirement that the ANGC explore the possible use of recycled water for irrigation is contained in Condition 198 of the Conditional Use Permit issued by the City of Los Angeles for the development of the golf course. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 4:** Despite LADWP claims that water used to irrigate the golf course will undergo "transevaporation" and will not mix with groundwater in "significant" quantities, there is strong evidence to refute this... Irrigating with recycled wastewater requires utilizing considerably more water (and fertilizer, and pesticides...) and, because of accumulation over time, the irrigated areas must be periodically flushed to wash away salt, boron and other residual chemicals. It would thus seem logically impossible to avoid contaminating groundwater, since the water table in the Tujunga Wash is very shallow, and in fact rises to the surface at times.

**Response:** The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of recycled water by providing recycled water for landscape irrigation. To protect public health and safety, the State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of the recycled water facilities. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. Additionally, the Los Angeles Regional Water Quality Control Board implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are protected. Recycled water proposed for distribution in this project would be required to meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment, including filtration and disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable recycled water quality standards.

ANGC, one of the proposed customers for this project, is a state-of-the-art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their Conditional Use Permit (CUP). Per their CUP, once irrigation water has been delivered to the site, Condition 28 for operation of the golf course is triggered. Condition 28 requires monitoring of local surface water and groundwater quality before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires monitoring and mitigation of water quality and quantity concerns for Tujunga Ponds. Condition 127 states that the irrigation input of water shall be at a replacement rate only. Condition 138 says the golf course shall be designed to maximize infiltration and minimize runoff. Condition 139 requires the golf course to develop and implement a water quality monitoring program. Condition No.194 requires that the golf course irrigation system be designed to minimize the number of acres receiving irrigation and be designed so non-essential turf areas would not be watered during droughts. Condition 196 requires that the irrigation system include computerized controls to avoid unnecessary watering and minimize water loss through evaporation. Condition 197 requires a landscape plan for

the course that emphasizes low water consumption grasses wherever possible. And finally, Condition 198 requires that the golf course, in order to reduce the demand on the water infrastructure, investigate with the LADWP the possible use of an on-site well and the possibility of connecting to the East Valley Reclamation Project pipeline for the use of recycled water.

Irrigation water use is effectively minimized at ANGC through design features, as required by the above conditions. Modern irrigation controllers coupled with weather monitoring devices allow the golf club to precisely determine and deliver the appropriate amount of water for the drought-tolerant hybrid Bermuda grass used as the primary turf on the club's tees, fairways and roughs. This system allows computers to send a signal to satellites in the field that change irrigation run times based on current heat, wind, solar radiation and humidity. Daily monitoring of the irrigation system for distribution uniformity aids in maximizing system efficiency and minimizing excess irrigation.

Generally, irrigation with recycled water may require additional water for periodic flushing to reduce salt concentrations in soils, but ANGC has been designed with highly drought- and salt-tolerant Bermuda grass to minimize the need for additional water use. Irrigation with recycled water does not increase the use of fertilizers and pesticides. In fact, fertilizer use with recycled water is generally reduced to compensate for the natural level of nutrients found in the water.

Additionally, under normal operating conditions, all water being used for irrigation will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a subgrade drainage system beneath putting greens, tees, and various areas in roughs and fairways is designed to collect and convey on site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all appropriate irrigation water quality parameters are met.

The City of Los Angeles Department of Recreation and Parks' Hansen Dam Recreation Area (HDRA), the other proposed customer for this project, uses Best Management Practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File 166080), as required by the California State Assembly Bill AB325, to ensure local water quality and reduce potential runoff.

Although water use is minimized at both of these facilities, it is assumed, and understood in the development of recycled water irrigation regulations, that some

amount of water movement beyond the turf root system into the groundwater is expected. The turf root system and soil matrix would effectively filter many potential contaminants as the water percolates into the groundwater. For example, an estimated 90 percent of nitrogen is removed from recycled water during infiltration, and preliminary research indicates nearly complete removal of many pharmaceuticals during groundwater infiltration. The small volume of recycled water, or recycled water mixed with potable water, that is expected to pass through the turf root system to infiltrate into the groundwater from these facilities, when mixed with large existing groundwater supplies, is expected to have a minimal effect on the drinking water supply.

Compliance with existing state and federal regulations regarding recycled water and user facility conditions would ensure a less than significant impact on water quality from the irrigation water that would be delivered by the proposed project.

**Comment 5:** High salt and boron and other chemicals could have a significant effect on the Big Tujunga Wash Mitigation Bank.... the Big Tujunga Wash is a fragile environment and no studies done on affect of recycled water or residual medications on the species ... Need a full EIR that takes into account CURRENT scientific knowledge and recent discoveries.

**Response:** The construction and operation of the proposed project is not expected to have an impact on the Big Tujunga Wash Mitigation Bank. Construction will not occur on, or in proximity to, the preserve. The operation of the proposed project would not have a significant impact on downstream water bodies, plants or animals because: 1) the irrigation water's quality is regulated by numerous state and federal regulations; 2) there are strict monitoring requirements and procedures in place to mitigate any potential water quality concerns to surface or groundwater at the ANGC; 3) the ANGC irrigation system is designed such that recycled and potable water can be blended within the system to obtain desired water quality objectives; and 4) the ANGC has been designed to minimize irrigation and to collect excess water on site for reuse in their irrigation system.

Recycled water proposed to be distributed through the project facilities would receive full tertiary treatment as specified under Title 22 and disinfection. This water would meet all current state and federal water quality criteria for recycled water supplies. Water delivered to HDRA and ANGC would be used for irrigation of turf areas only. Beyond the use of drought resistant grass, turf management practices, including irrigation optimization that conserves water (e.g., limiting areas to be irrigated) and evaporation would limit the area where recycled water would be used.

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In addition to regulatory agency guidelines, the operation of the ANGC involves numerous water quality measures that limit the area that would be in contact with the recycled water (e.g., away from native plant areas, including known populations of slender-horned spineflower). Condition 28 requires the monitoring of local surface water and groundwater quality conditions before and during the operation of the golf course. In addition, Condition 49 addresses requirements for the "Golf Course Management Plan" including control of chemicals for water quality management. Condition 138 requires the golf course to be designed to maximize infiltration and minimize runoff. And finally, Condition 139 requires the golf course to develop and implement a water quality monitoring program.

In addition, ANGC includes preserve areas of native plants, and mitigation (Measure 40) that specifically indicates that turf areas shall be graded to direct drainage away from the preserve areas. Furthermore, Mitigation Measure 41 approved as part of the ANGC project specifically indicates that "... as designed, there should be no movement of water from the golf course to the preserve. Precisely controlled irrigation systems will minimize runoff of irrigation waters. All drainage is away from the preserve so that even during storm events no runoff should reach the preserve from the golf course area." In addition, ANGC has an extensive surface and groundwater monitoring program to ensure that pre-ANGC water quality is maintained. Therefore, with the conditions placed on the golf course, it is anticipated that incidental runoff (small amounts of runoff from over-spray of sprinklers or overflow during major storm events) would be very minimal and not substantial and therefore, not considered a significant or adverse impact on the Big Tujunga Mitigation Bank.

Potential impacts on sensitive biological resources are further described in Appendix B of the IS/MND (Biological Resources Technical Memorandum).

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 6:** Recent learnings suggest that early optimism about the safety of recycled wastewater may have been sadly premature .... Residual medications pose a significant health risk and are grave concern ..... Unrecognized environmental pollutants that are derived from usage by individuals and pets, medication disposal, transfer of biosolids to land, medicated feeds .....More previously unidentified DBPs have been found ...

**Response:** Please refer to the Response to Comment 4 regarding the regulatory requirements and safety of the use of recycled water. It also should be noted that, as part of the City's detailed monitoring of its water quality, in 2001, LADWP tested for drug

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residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including the Tillman Water Reclamation Plant. No drug residues were detected in any of the samples.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 7:** For all of the above reasons, I request a full EIR be done for the Hansen Area (waste) Water Recycling Project ....previous studies have been rendered obsolete by new discoveries and knowledge.

**Response:** Please refer to the Response to Comment 1 regarding the preparation of an MND for the proposed project. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 8:** Fear that effects of irrigating areas of the Big Tujunga Wash with recycled wastewater might go unrecognized for years ....

**Response:** Please refer to the Responses to Comments 4 and 5 regarding potential impacts of the proposed project to local water quality and the Big Tujunga Wash. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 9:** Fear for my family's health ... for future generations .... Health of the unique environment of the Tujunga Wash ..... A full EIR is not unreasonable to demand, knowing what is at stake.

**Response:** Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 10:** Consider first piloting this project at the Lopez Canyon Landfill because removed from groundwater table, designed to prevent runoff, under extensive regulatory oversight, extensive monitoring already exists, infrastructure in place, would save the city 3 million gallons per month of drinking water, would not endanger a fragile ecosystem ...

**Response:** The quality of recycled water distributed through the proposed project would meet all federal and state water quality requirements. As for the Lopez Canyon Landfill (LCL), LCL is not being proposed as a customer as part of this project. Supplying recycled water to LCL would require the development of a system with sufficient

hydraulic capacity to serve the water demand at adequate pressure. HDRA and ANGC are physically situated at elevations and locations that can be immediately served by utilizing the proposed pumping station at the Valley Generating Station (VGS) to lift the water to the proposed storage tank at a hydraulic grade of approximately 1,405 feet. Trying to use a single pump station at VGS to pump to the top of LCL would result in pressures too great for service at lower elevations such as at HDRA.

The existing pump station at LCL could be used to pump the water to Lopez Canyon Landfill if the LCL pipe system were re-designed so that irrigation water and industrial water would be completely separated from potable water uses; however, operating the LCL pump station without the proposed storage tank at ANGC would result in a system of two pump stations located in series without a storage tank. This type of system has the potential to cause cavitation of the pumps or pressure surges throughout the recycled water distribution scheme. To serve the LCL, the water would need to be pumped from the proposed storage tank to the existing LCL tank located on top of the landfill.

If a future project were to propose to extend a recycled water pipeline to LCL, the proposed project's pump station and storage tank would provide a system that (1) could operate at pressures which could continue to serve customers at lower elevations, and (2) would have the storage capacity to help provide adequate suction pressure for the existing LCL Pump Station to operate without causing cavitation of the pumps or pressure surges. Any proposed future project would undergo an environmental evaluation as required under CEQA.

**Comment 11:** I was unable to find this project listed on the CEQA website database. Was this project registered with CEQA? Does LADWP have another EIR with a different project name in the CEQA database?

**Response:** On February 26, 2004, we contacted the State Office of Planning and Research, State Clearinghouse, to address your concern that the project was not listed on the CEQA website data. State Clearinghouse staff indicated that they had received the IS/MND and had logged it in on January 28, 2004, and given it a State Clearinghouse Number 2004011129. Staff at the State Clearinghouse did not know why the database did not show the project as it was in their system. LADWP has since tried the CEQA website and found the IS/MND listed.

**Comment 12:** The Tujunga Watershed Council has asked residents along the project alignment whether they received notification of the project and we found the results to be few and sporadic.



**Response:** LADWP followed the CEQA noticing requirements, per the CEQA Guidelines, as they pertained to distribution of an IS/MND. As stated in CEQA Guidelines Section 15072(b), the lead agency shall mail a notice to all organizations and individuals who have previously requested such a notice in writing and shall also give notice by at least one of the following methods: 1) publication in a newspaper of general circulation in the area affected; 2) posting of notice on- and off-site in the area; or 3) direct mailing to the owners and occupants of contiguous property. LADWP submitted a notice of intent for the proposed project to both the Los Angeles County Clerk and the Los Angeles City Clerk on January 29, 2004. LADWP also published the notice in the *Los Angeles Times* on Thursday, January 29, 2004. In addition to sending notices to responsible agencies, LADWP, as is standard practice, sent notices to occupants whose address was along the proposed project alignment. The review period for the document was extended until July 21, 2004, for a total of 175 days of public review.

**Comment 13:** Even those residents who received notification were unable to ascertain, based on the notification letter, the project's full scope and impact. Many affected residents are horse owners whose access and safety would be seriously compromised by such a project, yet they did not receive notification sufficient to alert them to the potential safety issues. Your notification letter uses phrases "reclaimed/recycled water" which may be technically accurate but is confusing to people who don't recognize the difference between reclaimed wastewater and recycled stormwater currently being collected by the Sun Valley Watershed project.

**Response:** Per CEQA Guidelines Section 15072 (3)(f), a notice of intent shall include, as applicable to this project, a brief description of the project, the starting and ending dates for the review period, and the address(es) where copies of the document is available for review. The notification letter included ample information on the proposed construction of the project and the alignment affected by construction. The notice also included a listing of where the entire document could be viewed. The locations included the LADWP website, Sun Valley Branch Library, and Council Districts 2 and 6 field offices. The notice also include a contact person if additional assistance or information was needed.

**Comment 14:** An entire community (Riverwood Ranch) was not notified. They are the next-door neighbors of the Angeles National Golf Course and their community is directly adjacent to the proposed 1 million gallon tank. Why weren't they mentioned in the Project location.

**Response:** The project location lists those communities adjacent to the proposed project as identified in the appropriate City of Los Angeles Community Plan. On March 3, 2004, LADWP staff met with residents of Riverwood Ranch to discuss the project.

**Comment 15:** Conover Fire Road and the 1 million gallon recycled water tank are located within a pending dedication as a Habitat Preserve Area which will be deeded to the Santa Monica Mountains Conservancy (SMMC). The SMMC was not noted as a state agency having an interest in the proposed project.

**Response:** Although the location of the storage tank has been proposed within an area slated to be offered to the SMMC for future dedication by ANGC, the location of the tank would not conflict with the proposed habitat preserve dedication. Prior to the dedication of land to SMMC, ANGC is expected to dedicate easements for necessary roads and utilities in the area. The proposed tank site would be dedicated by the to LADWP under a utility easement as part of this process. This dedication would not interfere with or affect ANGC's ability to meet their obligations to the City of Los Angeles or the SMMC as specified in their Conditional Use Permit.

**Comment 16:** The project construction will cross a wildlife corridor at the Little Tujunga Wash. This area is designated as Environmentally Sensitive area (ESA) by the County of Los Angeles. This was confirmed with information from the website of the Wetlands Recovery Project. They are designated as a rural/agricultural area worthy of preservation in the Environmental Element of the Los Angeles General Plan.

**Response:** The portion of the project that crosses the Tujunga Wash, Significant Ecological Area (SEA) 24 designated by the County of Los Angeles, is along Glenoaks Boulevard. (The County of Los Angeles has no known designation of "Environmentally Sensitive Areas.") The pipeline will be mounted to the underside of the existing bridge on Glenoaks Boulevard over the Tujunga Wash, and thus, it would not impact the wash or SEA. As addressed in detail in Section IV and Appendix B of the IS/MND, SEAs, and specifically SEA 24, were addressed and no significant impact is anticipated to occur because of the proposed project. There is no Environmental Element of the Los Angeles General Plan. There is however a Conservation Element, which encourages the retention of parcels for agricultural and low density land use and zoning, as well equine areas. The Conservation Element does not designate any proposed project area as rural/agricultural worthy of preservation. As stated throughout the IS/MND, the existing zoning and land use (as shown in the Arleta-Pacoima and Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plans) along the proposed project alignment is industrial (e.g., LADWP VGS), open space (e.g., HDRA), commercial, residential, and public facilities. No areas adjacent to

the proposed project were designated as rural/agricultural. The project as proposed would occur in public rights-of-way and would not change or impact any existing zoning or land use.

**Comment 17:** The San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan affects the project from the intersection of Foothill and Osborne to the 1 million gallon (MG) tank location. Foothill Boulevard is designated as a Scenic Highway Corridor in the Plan. The proposed staging location south of the 210 freeway at the Wheatland off ramp is designated as the Vista Point.

**Response:** The IS/MND has been revised to include a discussion of the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan (Specific Plan), which went into effect on February 8, 2004. The Specific Plan sets forth provisions for Prominent Ridgeline and Scenic Highway Corridor protection. The proposed water tank would not be in violation of any of the provisions of the Specific Plan. The proposed location of the tank along the Conover Fire Road is not within a designated Prominent Ridgeline or within an area 60 vertical feet from a Prominent Ridgeline. The linear portion of the proposed project would follow portions of Foothill Boulevard designated as a Scenic Highway Corridor, but there are no provisions in the Specific Plan that prohibit construction or operation of infrastructure within the scenic corridor. Also, there would be no visual impacts of the storage tank from the scenic corridor as the corridor area provisions extend 500 feet on either side of the centerline of the roadway of each of the Scenic Highways and the proposed tank would be approximately 0.5 miles from Foothill Boulevard.

In addition, though designated as a future vista point, the Specific Plan does not preclude temporary construction activities from occurring at the I-210/Wheatland off ramp. However, LADWP will not utilize the I-210 Wheatland exit as a staging area. As you suggested in the field, an alternate staging area in close proximity to the proposed I-210/Wheatland exit has been proposed. This new staging area is adjacent to the Hansen Dam Sports Complex and is currently leased by Valley Crest Tree Company for tree storage. LADWP proposes to use this site instead of the I-210/Wheatland site. If this site is unavailable, then LADWP proposes to use another site in close proximity to the proposed project alignment but not the I-210/Wheatland site.

**Comment 18:** The area east of Foothill Boulevard and Conover intersection is pending dedication as a Habitat Preservation Area. The 1 MG tank location is within this area.

**Response:** Please refer to Response to Comment 15 above.

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**Comment 19:** The Angeles National Golf Course is a privately owned facility located in the Tujunga Valley, in the community of Sunland and not in the community of Lake View Terrace in the eastern San Fernando Valley.

**Response:** The IS/MND does not specifically call out the exact community in which the golf course is located. The environmental documents for the golf course indicate that the proposed project, located at 9401 Foothill Boulevard, is in the Sunland-Tujunga-Lake View Terrace-Shadow Hills District Plan, which corresponds to the community planning area assumed in the IS/MND. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 20:** The LADWP VGS site is also the location of another project using recycled stormwater runoff. Future benefits and uses derived by implementation of this project may be duplications of benefits and uses cited by this plan. The project is known as the Sun Valley Watershed Management Plan. This plan has been in development for over 5 years and has monthly stakeholder meetings open to the public from inception.

**Response:** The LADWP VGS site is just one of several properties from which the County is looking at taking stormwater runoff. Under the Sun Valley Watershed Management Plan, the stormwater runoff would be used for 1) infiltration for groundwater recharge, 2) reuse for gravel washing at the Vulcan Gravel Processing Plant, and 3) reuse for irrigation of landscaped areas at various locations. The Hansen Area Water Recycling Project is proposing to use recycled water, not stormwater, for irrigation. Like stormwater runoff, recycled water use is regulated by the Regional Water Quality Control Board. However, recycled water must meet more stringent water quality requirements (e.g., Title 22 requirements) for use at the HDRA and ANGC. Therefore, the proposed project and the County project are not duplicative of each other.

**Comment 21:** I disagree that the entire proposed project is located within an urbanized area in the City of Los Angeles. The Environmental Element of the City of Los Angeles General Plan designates this area as a rural/agricultural. It could be described as being in the urban/wildland interface.

**Response:** Please refer to Response for Comment 17 above.

**Comment 22:** The report fails to note that many streets in this area "dead-in" into the Angeles National Forest, San Gabriel Mountains or are "paper streets" that cross Little Tujunga Wash, Lopez Canyon Flood Channel (concrete lined), Hansen Dam Flood Control Basin or the 210 Freeway. Foothill Boulevard provides the ONLY ingress and egress to these communities.

**Response:** Prior to construction, LADWP would submit traffic control plans for approval to the Los Angeles Department of Transportation (LADOT) to ensure that traffic impacts, including impacts to public transportation routes such as "dead end" streets, are kept to a minimum. LADWP would comply with any requirements specified by LADOT. In Section 1.0 of the IS/MND, under Subsection 1.6 Construction Methods, starting on page 1-5, traffic control plans would be prepared in coordination with LADOT in order to maintain acceptable levels of service, traffic safety, and emergency access for the site vicinity during construction. As discussed in Section 3.0 of the IS/MND, under XV Transportation/Traffic, starting on page 3-48, for a temporary period during construction (approximately three months at one location), there would be minor alterations to the current traffic patterns. The pipeline would be installed in sections no longer than 500 feet (approximately the length of a short street block), within an approximately 1,200-foot work zone (up to a maximum of about 2,000 feet). After the installation of pipe within the work zone, the open trench in the street would be backfilled, paved, and returned to normal operation. Also, during construction activities, it is LADWP standard construction practice to maintain egress and ingress at all time for residences and emergency response vehicles.

**Comment 23:** The following facilities are located within ½ mile of the six-mile alignment: Maclay Middle School, one private school (Delphi Academy), and two elementary schools (Fenton Charter School and Brainard Elementary School).

**Response:** The IS/MND notes the presence of several existing and proposed (like Maclay) schools (please see page 2-2 and 3-26 of IS/MND) and the Maclay Middle School is specifically called out on page 3-56. The IS/MND has been corrected to include the other schools located within one-quarter of a mile as addressed in the CEQA IS Checklist. The IS/MND does indicate in the impacts section that schools were considered in the analysis, but that construction and operation of the proposed project is not anticipated to have an adverse effect on these facilities, since construction activities and operation would not create long-term air, hazards, noise or traffic impacts. The addition of these schools does not change that determination.

**Comment 24:** Also within a one-half mile impact area are treatment facilities including two sanitariums located near the intersection of Kagel Canyon and Eldridge plus the former Pacoima Memorial Hospital which is now Phoenix House, a major drug treatment facility at the corner of Eldridge and Terra Bella Streets in Lake View Terrace.

**Response:** The two sanitariums located near the intersection of Kagel Canyon and Eldridge are within the one-half mile area of potential affect; whereas the Phoenix House at the corner of Eldridge and Terra Bella would be further than one-half mile from the proposed project. The location of these two sanitariums does not change the results

of the IS/MND's impact analysis or conclusion that no significant impacts to sensitive receptors would occur from the construction or operation of the proposed project.

**Comment 25:** Checklist item I. Aesthetics – a). Potentially significant impact. In 1.6.1 of the MND, the possible off-site staging area suggested for the project to store “supplies and materials” is “South of Interstate 210 at Wheatland Avenue along the north side of the Tujunga Wash.” This is the location of the “Vista Point” shown in the San Gabriel/Verdugo Mountains Scenic Preservation Plan. The Vista Point will be completely unusable during the construction phase. No amount of mitigation can restore habitat that has remained undisturbed for over half a century. The boundary of the Big Tujunga Wash Mitigation Bank is at this location. It is imperative that an alternate location be chosen.

**Response:** Please refer to Response for Comment 17 above concerning the proposal of an alternate staging area to the I-210 Wheatland exit area.

**Comment 26:** Checklist item I. Aesthetics - b). Potential Significant Impact Unless Mitigation Incorporated. The entire length of Foothill Boulevard from Osborne Street to Conover Street is designated as a Scenic Highway Corridor by the San Gabriel/Verdugo Mountains Scenic Preservation Plan. While the pipeline may be buried underground, the effects of a major construction project on habitat close to the roadway may be affected by the construction operations.

**Response:** The recent approval of the San Gabriel/Verdugo Mountains Scenic Preservation Plan does not change the determination of Section 3.0, I. Aesthetics b) starting on page 3-1 of the IS/MND because the checklist item analyzes impacts on a state scenic highway, which has not changed. However, the section of the IS/MND has been updated to recognize the existences of this new plan. At this time, final design has not occurred and the exact location within the roadway where the proposed pipeline would be constructed is unknown. However, the pipeline will be placed under the existing paved roadway and construction activities would occur within the street right-of-way. The biological report (Appendix B of the IS/MND) determined that there was no sensitive habitat within the proposed project area of the public right-of-way, and that no sensitive habitat would be adversely affected by the construction of the proposed project.

**Comment 27:** Checklist item I. Aesthetics - c). Potential Significant Impact Unless Mitigation Incorporated. Conover Street is a restricted entry, unimproved fire road providing access to the Angeles National Forest. It is barred by several locked gates. It is also the route of a proposed natural surface equestrian trail by the Angeles Golf

Course Condition (25) within the 200 acres required to be dedicated Habitat Preservation Area. If this section of Conover were to be resurfaced with asphalt or gravel, this would significantly alter the conditions and specifications required by conditions set to mitigate the impacts of the golf course from which this project cannot be considered separately. The 1 MG will be prominently visible on the upslope area degrading the visual character from the recreational trail and the community of Riverwood Ranch. The tank appears to be tentatively located near an area near Eby Canyon that has also been the proposed route of a recreational trail. The view from the plateau and back to the San Gabriel Mountains would be completely dominated by an above ground tank. List of requested mitigation included.

**Response:** The Conover Street/Fire Road would be used for construction and maintenance of the proposed tank. The condition of the road will be maintained in a manner suitable for vehicular access and a natural surface equestrian trail. As discussed in Section 3.0 of the IS/MND on page 3-2, the 1 MG storage tank would be placed such that impacts to the visual character of the golf course and surrounding property would be minimized (i.e., the storage tank would be at least partially buried belowground, and the aboveground portion would be obscured from view by a downslope berm and landscaping. In addition, the area surrounding the proposed tank site would be restored to its natural state through the planting of native grasses, forbs, bushes, and trees, as appropriate, and any retaining walls or engineered slopes would be disguised. It is anticipated that such landscaping would reduce or avoid any adverse visual effects of the proposed storage tank.

**Comment 28:** Checklist item IV. Biological Resources - a). The MND does not address operation of the project even though the water will be used on a golf course and the Hansen Dam Flood Control Basin directly above an open aquifer of the Tujunga Wash. The golf course is immediately upstream from the Big Tujunga Wash Mitigation Bank (a designated habitat for the federally listed Santa Ana Sucker). Operation of the golf course is contingent on well monitoring throughout the life of the installation. While construction of the pipeline may have no impact, these areas are protected and subject to 404 regulation. I request that an extension of the comment period and that the lead agency contact the U.S. Department of Fish and Game regarding the impacts of operation of the project.

**Response:** Please refer to the Response to Comment 5 regarding potential impacts to the Big Tujunga Wash Mitigation Bank.

The comment period on the IS/MND was extended a number of times to a total of 175 days to facilitate additional project review and comment. Section 404 of the Clean Water

Act, administered jointly by the U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers, establishes a program to regulate the discharge of dredged and fill material into waters of the United States. No discharges of dredged and fill materials are proposed as part of this project, and, as such, the project is not subject to Section 404 regulation.

Construction and operation of the proposed project is not anticipated to directly impact resources under the jurisdiction of (1) the U.S. Fish and Wildlife Services (USFWS) pursuant to the federal Endangered Species Act or (2) the California Department of Fish and Game (CDFG) pursuant to the state Fish and Game Code and/or state Endangered Species Act. Because there is no anticipated impact on a state or federally listed Threatened or Endangered species, approval to impact (take) is not required from either the CDFG and/or USFWS; however CDFG was notified as part of standard LADWP practice through filing of the IS/MND with the State Clearinghouse and did not provide comments on the proposed project.

**Comment 29:** Checklist item IV. Biological Resources – d). Potential Significant Impact Unless Mitigation Incorporated. There are three areas of concern directly impacted by the proposed construction: 1) Little Tujunga Bridge Crossing is an established wildlife corridor that supports the frequent migration of deer and other large mammals down to the fresh water in Hansen Dam. Opinion supported by 2002 EIR for Hansen Dam Soccer Complex [comment followed by list of requested mitigation]. 2) Proposed staging area south of Wheatland and I-210 is a breeding and feeding area for Black Tailed Jackrabbits. Further disturbance of this area could result in significant adverse effects to wildlife [comment followed by a requested mitigation measure]. 3) Conover Fire Road and tank construction area may permanently decrease use of the area as a local movement corridor and habitat area [comment followed by list of requested mitigation, including a request for local removal of *Arundo donax*].

**Response:** Wildlife movement/corridor is discussed in detail in the biological technical memorandum for the proposed project (starting on page 5 of Appendix B of the IS/MND). Construction of the proposed pipeline would be short-term (lasting approximately three months) at any one location. Though a few areas adjacent to the proposed project could support wildlife corridors, construction would not interfere substantially with this movement. As for adding mitigation for habitat restoration to remove giant reed, *Arundo donax*, no construction is proposed within the wash and therefore, the construction of the proposed project would not spread this plant.

Refer to Response to Comment 26 above regarding the proposed staging area at I-210 and Wheatland.



Though construction of the tank would take approximately 12 months to construct, this is considered a short-term impact. Wildlife in the area of tank construction would use other corridors temporarily. Following construction, there would be a complete restoration of habitat disturbed by construction through planting of native grasses, forbs, bushes, and trees (including native oaks), as appropriate. The operation of the tank is not expected to create a permanent barrier to wildlife movement or eliminate an important habitat area (refer to Appendix B of IS/MND).

**Comment 30:** Checklist item IV. Biological Resources – e). Potential Significant Impact Unless Mitigation Incorporated. The area from the intersection of Foothill and Osborne and the Los Angeles National Golf Course are within the boundaries of the San Gabriel/Verdugo Mountains Scenic Preservation Plan, the Condition of Uses and Mitigation for the Canyons Hills Golf Course, the Rim of the Valley Corridor Proposed National Park, Hansen Dam Soccer Complex and Master Mitigation Plan for the Big Tujunga Wash Mitigation Bank. Request that an extension of the comment period be granted to compare the project proposal and determine if any conflicts exist.

**Response:** The documents mentioned by the commenter have been reviewed and no conflict exists regarding any local policies or ordinances protecting biological resources; therefore, the proposed project would not result in an impact. Since the original review period from January 29, 2004 to February 27, 2004, the review period for the document was extended until July 21, 2004, for a total of 175 days of public review.

**Comment 31:** Checklist item IV. Biological Resources – f). There are over 370 Conditions for the Canyon Hills Golf Course, including a 200 acre Habitat Preservation Area dedication to the SMMC. The Conover Fire Road and site of the 1 MG tank are within this area. There are three areas of concern directly impacted by the proposed construction: 1) Little Tujunga Bridge Crossing is an established wildlife corridor that supports the frequent migration of deer and other large mammals down to the fresh water in Hansen Dam. Opinion supported by 2002 EIR for Hansen Dam Soccer Complex [comment followed by list of requested mitigation]. 2) Proposed staging area south of Wheatland and I-210 is a breeding and feeding area for Black Tailed Jackrabbits. Further disturbance of this area could result in significant adverse effects to wildlife [comment followed by a requested mitigation measure]. 3) Conover Fire Road and tank construction area may permanently decrease use of the area as a local movement corridor and habitat area [comment followed by list of requested mitigation].

**Response:** Refer to Response to Comment 16 above regarding ANGC's proposed dedication of land to the SMMC.

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Regarding hours of operation, as stated in the IS/MND, construction activities would generally be carried out between 7 a.m. and 6 p.m., Mondays to Fridays, and 8 a.m. and 5 p.m. on Saturdays, in accordance with the City of Los Angeles Noise Ordinance.

Regarding your request for a natural surface recreation trail, your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 34:** Checklist item XV. Transportation/Traffic. The proposed project is partially located within an area that is described by the Environmental Element of the General Plan (adopted 2001) as a rural/agricultural area worthy of preservation. This is also reflected in the Sunland-Tujunga Shadow Hills Lake View Terrace Community Plan which describes the area as predominately zoned RA. There will be substantial impacts to transportation routes whose ingress and egress is via Foothill Boulevard. These intersections are noted above in the Public Services comment. Foothill is not only a Major Class II Highway, it is the ONLY way to reach certain residences located along the route. Work along Foothill Boulevard will affect residents during the entire period of construction. I request that special care be given along the route to never block these critical access points for extended periods of time. I request mitigation for the extreme inconvenience which will be in both the severity of blocked access and the duration of time (three years). I request a natural surface recreation trail (including landscaped buffer between the street and trail) be constructed along the south side of Osborne from the intersection of Osborne and Glenoaks to the Hansen Dam overlook in Council District 7 and along the north side of Foothill from the intersection of Osborne Street to Wheatland Avenue in Council District 2.

**Response:** Please refer to the response to Comment 33 above.

**Comment 35:** Checklist item XVI. Utilities and Service Systems – c). Potential Significant Impact Unless Mitigation Incorporated. This is a rural neighborhood with sufficient open space within the Tujunga Watershed to absorb storm water during all but the most significant storm events. There are no stormwater drainage facilities provided along much of the proposed alignment and surrounding vicinity. This includes an absence of curbs and gutters. The capacity of the Stormwater drainage facilities is therefore limited to surface facilities and prone to entering private residences and driveways. Any dewatering during construction will impact as street runoff along the route before finally draining into the Tujunga Wash. I request that dewatering be monitored to avoid water running for prolonged distances or into private residences along the proposed routes.

**Response:** As stated in various sections of the IS/MND, if dewatering is necessary, it will be carried out in accordance with all applicable requirements, whether that be for water quality requirements or discharge locations; therefore, dewatering would not be performed in a manner that causes a significant impact.

**Comment 36:** Checklist item XVII. Mandatory Findings of Significance – a). Potential Significant Impact Unless Mitigated. As noted in other sections, the impact areas are limited to 1) Little Tujunga Creek Crossing, 2) Proposed staging area at Wheatland south of I-210, and 3) Conover Fire Road and the one acre tank site. While these locations represent a fraction of the proposed route, they represent disruption of the only 3 passages from the San Gabriel Mountains of the Angeles National Forest to Hansen Dam, a permanent water source for large mammals. A one-year disruption of the Black Tailed Jack Rabbit at site 2) could possibly disrupt breeding and permanently affect population of that species. Site 3) will be under construction for over a year and is the location of a Habitat Preservation Area set aside for the benefit of numerous species and required to be dedicated to the SMMC. All three sites provide a functional wildlife corridor that would be fragmented during construction. Mitigation should be required [followed by a list of requested mitigation].

**Response:** Refer to Response to Comment 31 above

**Comment 37:** Checklist item XVII. Mandatory Findings of Significance – b). Potential Significant Impact Unless Mitigation Incorporation. There is a substantial number of projects along the proposed route not undertaken by the LADWP as Lead Agency. The construction timetables of these projects run concurrently with the timetable for this project. Generated truck traffic and vehicle traffic associated with construction worker travel, as well as lane closures could elevate the impacts of concurrent construction unless coordinated. Projects with already approved EIR's listed on the State of California Website that are expected to be funded, bid and started within the time frame of this project include: Hansen Dam Soccer Complex, Sun Valley Watershed Management Plan, Hansen Dam Master Plan and EIS, Los Angeles Children's Museum, Canyon Hills Golf course Clubhouse construction, and possible reactivation of the Water Conservation and Supply Feasibility Study – Hansen Dam Draft EIR/EIS.

**Response:** Section XVII of the IS/MND addresses potential cumulative affects associated with the combination of the proposed Project and other projects occurring in the local area. As described therein, two non-LADWP projects have been identified in close proximity to the proposed alignment. Based on the nature and timing of those projects, no significant cumulative impacts are expected to occur. The subject section also discusses the potential for cumulative impacts to occur from other possible

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projects. The proposed project, being primarily a linear infrastructure improvement project with impacts that will be temporary and transitory in nature, is not expected to cause impacts that are cumulatively considerable. It should also be noted that certain policies and procedures such as coordinating construction haul route plans through the LADOT would help to coordinate the construction traffic activities of multiple projects, should they occur in proximity to each other, which would serve to mitigate potentially significant cumulative impacts.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez

## MARGIE BEESON

---

11416 Oracs Avenue  
Lake View Terrace, CA 91342  
Home: 818-896-8390

Cell: 818-694-9266  
margie\_beeson@yahoo.com  
Fax: 818-896-8310

Charles Holloway  
111 North Hope Street Rm 1044  
Los Angeles, CA 90012

Dear Mr. Holloway,

I am very concerned with the proposed construction of the recycled water pipeline and the eventual water running through it along Foothill Blvd in Lake View Terrace.

The spreading grounds for this water are the new Angeles Golf Course and the community has not had time to analyze if this golf course is affecting the water aquifer below it. The water table in this area is very high at times adding further possible contamination down stream and eventually the water system of the city of Los Angeles.

We also have found that a full EIR was not done on this project but was attached to the existing EIR of the Angeles Golf Course. In the Angeles Golf Course EIR nothing was mentioned about the use of recycled waters and therefore no impact was ascertained as to the waste waters effect on the environment of this area. A full EIR needs to be done on the recycled water project itself.

I am also concerned about the effects to the wildlife in this area. I do not feel that sufficient studies have been done on the impact of the recycled water on wildlife and water habitat. There are a number of questions concerning pharmaceuticals and other items that are still in the recycled waters.

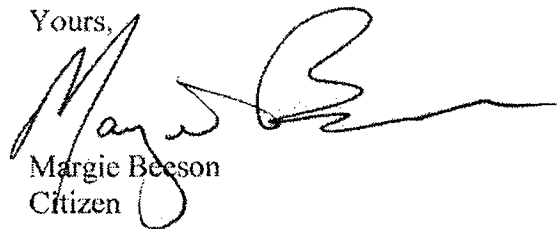
I would hope that technology is with us in these endeavors to use recycled water but I feel that the use of recycled water above an environmentally sensitive area such as the Hansen Dam area are, at this time, not acceptable by this community.

There are many other locations below Hansen Dam. I suggest the Hansen Dam Golf Course itself for a storage tank. There is a large area at the base of the Dam that is not in use between the Golf Course and the Riding Trail which is high enough for your needs.

There is also Lopes Canyon Land Fill which not only has a pumping station but a storage tank. It was mentioned at the Tujunga Watershed meeting that this was too high a step to make. I would suggest then to put in a tank half way down to meet your needs.

These two sites would be a cost savings over the proposed site above Angeles Golf Course. They are also not in an environmentally sensitive area and an aquifer for LA drinking water.

Yours,

A handwritten signature in black ink, appearing to read 'Margie Beeson', with a long horizontal flourish extending to the right.

Margie Beeson  
Citizen



ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Margie Beeson  
11416 Orcas Avenue  
Lake View Terrace, CA 91342

Dear Ms. Beeson:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** I am very concerned with the proposed construction of the recycled water pipeline and the eventual water running through it along Foothill Boulevard in Lake View Terrace. The spreading grounds for this water are the new Angeles Golf Course and the community has not had time to analyze if this golf course is affecting the water aquifer below it. The water table in this area is very high at times adding further possible contamination down stream and eventually the water system of the City of Los Angeles.

**Response:** The proposed project would not directly discharge into any local drainage or the groundwater. Water delivered to the two proposed customers for the project, the Hansen Dam Recreation Area (HDRA) and the Angeles National Golf Club (ANGC), would be used for irrigation of turf areas only.

ANGC is a state-of-the-art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their Conditional Use Permit (CUP). For example, Condition 28 requires monitoring of local surface water and groundwater quality conditions before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires the monitoring and mitigation of water quality and quantity concerns for Tujunga Ponds. Condition 138 says the golf course shall be designed to maximize infiltration and minimize runoff. And finally, Condition 139 requires the golf course develop and implement a water quality monitoring program.

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

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

Additionally, under normal operating conditions, all water being used for irrigation at ANGC will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a sub-surface drainage system beneath the putting green, tees, and various areas in roughs and fairways is designed to collect and convey on-site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all water quality parameters are met.

The HDRA uses Best Management practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File 166080) as required by the California State Assembly Bill AB325, to ensure local water quality and reduce potential runoff.

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Although water use is minimized at both of these facilities, it is assumed, and understood in the development of recycled water irrigation regulations, that some amount of water movement beyond the turf root system into the groundwater is expected. The turf root system and soil matrix would effectively filter many potential contaminants as the water percolates into the groundwater. For example, an estimated 90 percent of nitrogen is removed from recycled water during infiltration, and preliminary research indicates nearly complete removal of many pharmaceuticals during groundwater infiltration. The small volume of recycled water, or recycled water mixed with potable water, that is expected to pass through the turf root system to infiltrate into the groundwater from these facilities, when mixed with large existing groundwater supplies, is expected to have a minimal effect on the drinking water supply.

Compliance with existing state and federal regulations regarding recycled water and user facility conditions would ensure a less than significant impact on water quality in the aquifer from the irrigation water that would be delivered by the proposed project.

The Los Angeles Department of Water and Power (LADWP) as the major water supplier in Los Angeles has a commitment to maintaining the reliability of the City's potable water supply which includes water from groundwater sources. As with recycled water, there are existing monitoring programs that ensure quality of the groundwater is maintained. All uses of recycled water will be in strict compliance with directives issued by state and local health agencies.

**Comment 2:** We also have found that a full Environmental Impact Report (EIR) was not done on this project but was attached to the existing EIR of the Los Angeles Golf Course. In the Angeles Golf Course EIR nothing was mentioned about the use of



Ms. Margie Beeson  
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recycled waters and therefore no impact was ascertained as to the wastewaters effect on the environment of this area. A full EIR needs to be done on the recycled water project itself.

**Response:** The proposed project does not rely on the Los Angeles Golf Course EIR for any part of the environmental review process. The IS/MND for the Hansen Area Water Recycling Project satisfies the requirements for environmental evaluation under the California Environmental Quality Act (CEQA).

CEQA has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an Initial Study (IS). This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies an MND. If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an EIR.

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors for project construction and operation. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, a MND was prepared and publicly distributed for review and comment.

Recycled water proposed to be distributed through the project facilities will meet all state and federal water quality criteria for recycled water supplies. The State of California Department of Health Services (DHS) and Regional Water Quality Control Board (RWQCB) set forth standards and guidelines for water quality which protect public health and ensure that water resources are not degraded. As mentioned in response to Comment 1 above, the proposed project would not directly discharge into any local drainage or the groundwater. In addition to legislation, guidelines from the local agency, construction and operation of the ANGK also includes numerous water quality measures/conditions that limit the area that would be in contact with the recycled water (e.g., away from native plant areas), as well as a surface and groundwater monitoring program that monitors water quality from the golf course.

**Comment 3:** I am also concerned about the effects to the wildlife in this area. I do not feel that sufficient studies have been done on the impact of the recycled water on wildlife and water habitat. There are a number of questions concerning pharmaceuticals and other items that are still in the recycled waters.

**Response:** The operation of the proposed project would not have a significant impact on local wildlife or habitat because: 1) the irrigation water's quality is regulated by numerous state and federal regulations; 2) there are strict monitoring requirements and procedures in place to mitigate any potential water quality concerns to surface or groundwater at the ANGC; 3) the ANGC irrigation system is designed such that recycled and potable water can be blended within the system to obtain desired water quality objectives; 4) the ANGC has been designed to minimize irrigation and to collect excess water on site for re-use in their irrigation system; and 5) HDRA uses Best Management Practices (BMPs) to ensure local water quality and reduce potential runoff.

In addition to regulatory agency guidelines, the operation of the ANGC involves numerous water quality measures that limit the area that would be in contact with the recycled water (e.g., away from native plant areas, including known populations of slender-horned spinyflower). Condition 28 requires the monitoring of local surface water and groundwater quality conditions before and during the operation of the golf course. In addition, Condition 49 addresses requirements for the "Golf Course Management Plan" including control of chemicals for water quality management. Condition 138 requires the golf course to be designed to maximize infiltration and minimize runoff. And finally, Condition 139 requires the golf course to develop and implement a water quality monitoring program.

In addition, ANGC includes preserve areas of native plants, and mitigation (measure 40) that specifically indicates that turf areas shall be graded to direct drainage away from the preserve areas. Furthermore, Mitigation Measure 41 approved as part of the ANGC project specifically indicates that "... as designed, there should be no movement of water from the golf course to the preserve. Precisely controlled irrigation systems will minimize runoff of irrigation waters. All drainage is away from the preserve so that even during storm events no runoff should reach the preserve from the golf course area." In addition, the ANGC has an extensive surface and groundwater monitoring program to ensure that pre-ANGC water quality is maintained. Therefore, with the conditions placed on the golf course, it is anticipated that incidental runoff (small amounts of runoff from over-spray of sprinklers or overflow during major storm events) would be very minimal and not substantial and therefore, not considered a significant or adverse impact on local wildlife or habitat.

Potential impacts on sensitive biological resources are further described in Appendix B of the IS/MND (Biological Resources Technical Memorandum).

Recycled water proposed to be distributed through the project facilities would receive full tertiary treatment including filtration for pathogen removal as specified under Title 22. This water would meet all current state and federal water quality criteria for recycled water supplies. DHS and RWQCB set forth standards and guidelines for water quality which protect public health and ensure that water resources are not degraded. New information and technologies would be addressed by these enforcement agencies. The recycled water that would be distributed by the proposed project would meet all the most current and applicable regulatory standards and requirements through permits obtained from the DHS and RWQCB.

In addition, as part of the City's detailed monitoring of its water quality, in 2001, LADWP tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including recycled water from the Donald C. Tillman Water Reclamation Plant which would serve as the recycled water source for the proposed project. No drug residues were detected in any of the samples.

**Comment 4:** I would hope that technology is with us in these endeavors to use recycled water but I feel that the use of recycled water above an environmentally sensitive area such as the Hansen Dam area are, at this time, not acceptable by this community.

**Response:** Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

**Comment 5:** There are many other locations below Hansen Dam. I suggest the Hansen Dam Golf Course itself for a storage tank. There is a large area at the base of the Dam that is not in use between the Golf Course and the Riding Trail which is high enough for your needs.

**Response:** The area suggested at the base of Hansen Dam has an approximate elevation of between 1000 and 1080 feet, and a storage tank at this elevation would not be able to provide adequate pressure to operate the proposed recycled water delivery system.

**Comment 6:** There is also Lopez Canyon Landfill which not only has a pumping station but a storage tank. It was mentioned at the Tujunga Watershed meeting that this was too high a step to make. I would suggest then to put a tank half way down to meet your

Ms. Margie Beeson  
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October 18, 2005

needs. These two sites would be a cost savings over the proposed site above Angeles Golf Course. They are also not in an environmentally sensitive area and an aquifer for LA drinking water.

**Response:** Lopez Canyon Landfill (LCL) is not being proposed as a customer as part of this project. Supplying recycled water to LCL would require the development of a system with sufficient hydraulic capacity to serve the water demand at adequate pressure. HDRA and ANGC are physically situated at elevations and locations that can be immediately served by utilizing the proposed pumping station at the Valley Generating Station (VGS) to lift the water to the proposed storage tank at a hydraulic grade of approximately 1,405 feet. Trying to use a single pump station at VGS to pump to the top of LCL would result in pressures too great for service at lower elevations such as at HDRA.

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The existing pump station at LCL could be used to pump the water to Lopez Canyon Landfill if the LCL pipe system were redesigned so that irrigation water and industrial water would be completely separated from potable water uses; however, operating the LCL pump station without the proposed storage tank at ANGC would result in a system of two pump stations located in series without a storage tank. This type of system has the potential to cause cavitation of the pumps or pressure surges throughout the recycled water distribution scheme. To serve the LCL, the water would need to be pumped from the proposed storage tank to the existing LCL tank located on top of the landfill.

If a future project were to propose to extend a recycled water pipeline to LCL, the proposed project's pump station and storage tank would provide a system that (1) could operate at pressures which could continue to serve customers at lower elevations and (2) would have the storage capacity to help provide adequate suction pressure for the existing LCL Pump Station to operate without causing cavitation of the pumps or pressure surges. Any proposed future project would undergo an environmental evaluation as required under CEQA.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Ms. Margie Beeson  
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Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc

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Enclosure

c: Ms. Sarah Easley Perez



February 25, 2004

Los Angeles Department of Water and Power  
Environmental Affairs,  
Attn: Charles Holloway, Supervisor of Environmental Assessment  
City of Los Angeles  
111 North Hope Street Room 1044  
Los Angeles, CA 90012

ALSO  
VIA FAX  
213 367-3582

**SCH NOT ON FILE**  
**Initial Study/Proposed Mitigated Negative Declaration**  
**HANSEN AREA WATER RECYCLING PROJECT WP-038-04**  
**January 2004**

### PUBLIC REVIEW COMMENT LETTER

Dear Mr. Holloway:

On February 11, 2004, I met with Mr. Valentin Amezcuita and Mr. Steven Ott of the Los Angeles Department of Water and Power and toured the proposed route of this project. I wish to thank them for taking the time to voice my concerns.

I am writing this comment letter to review those concerns in written form and provide more detail.

#### LACK OF SUFFICIENT NOTICE

- I could not find this project listed on the CEQA website database. The comment period is due to expire Friday, and I expected a project of this magnitude to be listed here. Does the DWP have another EIR with a different project name for listing in the CEQA database?
- When I arranged, by telephone, with Mr. Amezcuita to meet for the tour, I asked about notices mailed to residences along Foothill Boulevard in Lake View Terrace. I specifically asked, because many homes with hundreds of feet of frontage along this street actually have addresses on cross streets. I noted one address with over 100 feet of frontage along Foothill : 11295 Orcas Avenue, Lake View Terrace, Ca 91342. He told me it was not on the notification list, but assured me he would send one to this address. This is the home of Valley View Vaulters, a recreational therapy venue for handicapped and home schooled children whose only access is via Foothill Blvd. There are dozens of residences whose only access is via Foothill Boulevard. Shouldn't these residents be given an extended period to comment?
- There is an entire community in the unincorporated area of the County of Los Angeles that was not notified. This is the Community of Riverwood Ranch. This is important because they are the next door neighbors whose lots directly abut property owned by the Angeles National Golf Course. Their community is directly adjacent to the proposed 1 Million gallon tank. Why weren't they mentioned in the Project Location?

- Conover Fire Road and the 1 Million Gallon Recycled water tank are located within a pending dedication as a Habitat Preserve Area which will be deeded to the Santa Monica Mountains Conservancy (SMMC). The SMMC was not noted as a state agency having an interest in the proposed project

## GENERAL PLAN DESIGNATION

- The project construction will cross a wildlife corridor at the Little Tujunga Wash. This area is designated as Environmentally Sensitive Area (ESA's) by the County of Los Angeles. This was confirmed with information from the website of the Wetlands Recovery Project. The area is designated as a rural/agricultural area worthy of preservation in the Environmental Element of the Los Angeles General Plan.

## ZONING

- The San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan affects the project from the intersection of Foothill and Osborne to the 1 million gallon (MG) tank location. Foothill Boulevard is designated as a Scenic Highway Corridor in the Plan. The proposed staging location south of the 210 freeway at the Wheatland offramp is designated as the Vista Point.  
The lead agency was the City of Los Angeles Department of City Planning. See CPC2000- 1357SP Ordinance 175736 was adopted December 19, 2003 and became effective February 8, 2004.
- The area east of Foothill Boulevard and Conover intersection is pending dedication as a Habitat Preservation Area. The 1 Million gallon (1MG) tank location is within this area. The lead Agency was the City of Los Angeles Department of City Planning. See CPC 96-0243, CPC 96-0241 AND CR 97-0469 AND 95-0286-CUC, CUB & VAC. The EIR review was filed with CEQA under State Clearing House Number 19 95051004.

## DESCRIPTION OF PROJECT

- The Angeles National Golf Course is a privately owned facility located in the Tujunga Valley, in the community of Sunland and not in the Community of Lake View Terrace in the eastern San Fernando Valley.  
Sunland should be included because it will be part of the project once the system is in operation. Project location information is from the Sunland USGS 7.5 quadrangle.
- The LADPW VGS site is also the location of another project using recycled **stormwater runoff**. Future benefits and uses derived by implementation of this project may be duplications of benefits and uses cited by this plan. The project is known as the Sun Valley Watershed Management Plan. SCH No. 2002111051 prepared October 2003 for the County of Los Angeles Department of Public Works. This plan has been in development for over 5 years and has had monthly stakeholder meetings open to the public from inception. Their website is [www.SunValleyWatershed.org](http://www.SunValleyWatershed.org)



## **SURROUNDING LAND USES AND SETTING**

I disagree that the entire proposed project is located within an urbanized area in the City of Los Angeles. The Environmental Element of the City of Los Angeles General Plan designates this area as a rural/agricultural. It could also be described as being in the urban/wildland interface.

The report failed to note that many streets in this area "dead-end" into the Angeles National Forest, San Gabriel Mountains or are "paper streets" that cross Little Tujunga Wash, Lopez Canyon Flood Control Channel (Concrete Lined), Hansen Dam Flood Control Basin or the 210 Freeway. Foothill Boulevard provides the ONLY ingress and egress to these communities.

The following facilities are also within ½ mile of the 6-mile alignment: Maclay Middle School (bordered on one side by Glenoaks Blvd), one private school (Delphi Academy)-- Corner of Foothill and Brainard-- and two elementary schools, Fenton Charter School and Brainard Elementary School.

Also within the ½ mile impact area are treatment facilities including 2 other sanitariums located near the intersection of Kagel Canyon and Eldridge plus the former Pacoima Memorial Hospital which is now Phoenix House, a major drug treatment facility at the corner of Eldridge and Terra Bella Streets in Lake View Terrace.

## COMMENTS AND CONCERNS OF ENVIRONMENTAL CHECKLIST

### I. AESTHETICS

Would the project

a) Have a substantial adverse effect on a scenic vista?

**Potentially Significant Impact .** In 1.6.1 Pipeline Construction of the MND, the possible off-site staging area suggested for the project to store "supplies and materials" is "South of Interstate 210 at Wheatland avenue along the north side of the Tujunga Wash" . Wheatland South of the 210 Freeway. This is the location of the "Vista Point" shown on the December 2003 Map No 1 and Section 9 and Part D (Vista Points and Staging Areas) of the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan Boundaries. The Vista Point will be completely unusable during the construction phase. No amount of mitigation can restore habitat that has remained undisturbed for over half a century. The boundary of the Big Tujunga Wash Mitigation Bank is at this location. It is imperative that an alternate location be chosen.

b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

**Potentially Significant Impact Unless Mitigation Incorporated** The entire length of Foothill Boulevard from Osborne Street to Conover Street is designated as a Scenic Highway Corridor by the The San Gabriel/Verdugo Mountains Scenic Preservation Plan. While the pipeline may be buried underground, the effects of a major construction project on habitat close to the roadway may be affected by the construction operations.

Requested mitigation

- A habitat restoration plan to restore habitat areas at the Little Tujunga Wash damaged by construction.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

**Potentially Significant Impact Unless Mitigation Incorporated**  
"Conover Street" is a Restricted Entry, unimproved fire road providing access to the Angeles National Forest. It is barred by several locked gates, the first immediately eastward of the intersection of Conover and Foothill. It is also the route of a proposed natural surface equestrian trail by the Angeles National Golf Course Condition number (25) within the 200 acres required to be a dedicated Habitat Preservation Area. If this section of Conover were to be resurfaced with asphalt or gravel, This would significantly alter the conditions and specifications required by Conditions set to mitigate the impacts of the golf course from which this project cannot be considered separately.

The 1 million gallon (1MG) tank will be prominently visible on the upslope area degrading the visual character from the Recreational Trail and community of Riverwood Ranch.

The tank appears to be tentatively located in an area near Eby Canyon that has also been the proposed route of a recreational trail. The view from the plateau and back to the San Gabriel Mountains would be completely dominated by an above ground tank.

Requested mitigation:

- Complete underground installation of tank
- Complete restoration of the habitat disturbed by construction of the tank including drainage benches above and below the proposed storage tank site (Pg3-54 XVI c)
- Complete restoration of the habitat disturbed by any staging areas
- No asphalt or gravel used on the route known as Conover Street
- No Concrete channelization of Eby Canyon from the tank site to the Tujunga Wash
- Retention or replacement of specimen native plants.

#### IV BIOLOGICAL RESOURCES

**Would the project**

**a) Have a substantial adverse effect, either directly or through habitat modifications on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

The MND does not address operation of the project even though the water will be used on a golf course and in the Hansen Dam Flood Control Basin directly above the open aquifer of the Tujunga Wash. The golf course is immediately upstream from the Big Tujunga Wash Mitigation Bank ( a designated habitat for the federally listed Santa Ana Sucker. Operation of the golf course is contingent on well monitoring throughout the life of the installation. While construction of the pipeline may have no impact, These areas are protected and subject to 404 regulation. Other sources reviewed include the Southern California Mountains and Foothill Assessment (Stephenson and Calcarone (1999)

I request an extension of the comment period and that the lead agency contact the U.S. Department of Fish and Game regarding the impacts of the operation of the project.

**d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?**

**Potentially Significant Unless Mitigation Incorporated** There are three areas of concern directly impacted by the proposed construction.

1) Little Tujunga Bridge Crossing

This is an established wildlife corridor that supports the frequent migration of deer and other large mammals down to the fresh water in Hansen Dam. This opinion is supported by the 2002 EIR study completed for the Hansen Dam Soccer Complex (State Clearing House 2002021137 Pg 26 Wildlife Movement Corridors)

Mitigation Requested

- Allow for nocturnal passage of (large mammals) wildlife without obstruction for the period of construction.
- Follow up plan and habitat restoration to remove *Arundo donax* which may be spread and established in new areas due to excavation.
- Restoration of the Recreational Trail under Foothill Boulevard to Clybourn Avenue affected by construction.

2) Proposed Staging area south of Wheatland and Interstate 210 Freeway

This is a breeding and feeding area for Black Tailed Jackrabbits. Disturbance of this area by a staging area could result in significant adverse effects to wildlife within this project staging area and immediate vicinity.

This Potentially Significant impact could be avoided by choosing an alternate staging area and noting that staging or parking of any kind in this area is prohibited at the Wheatland offramp.

Mitigation Requested

- The Osborne offramp be designated as the preferred construction transportation route and Sunland Boulevard offramp be designated as an alternate. Note to contractors that staging or parking of any kind is prohibited at the Wheatland offramp.

3) Conover Fire Road and Tank construction area

The development of the tank location and 12 month construction cycle may permanently decrease use of the area as a local movement corridor and habitat area. This is an established portion of territory for deer, mountain lion and bobcat. See: Chambers Group list of Observed Species. This area is currently sparsely populated and an impact would mostly result from the increased noise and human presence during construction. The plateau above the Tujunga Wash provides grazing for prey animals and hunting areas for predators including a large population of raptors.

Requested Mitigation

- I request that the tank be installed underground.
- I request that the habitat disturbed by construction be restored with native forbs and grasses, bushes and trees (Including native oaks).
- I request that stormwater runoff be collected on site and a "bubbler" wildlife watering station be installed to entice wildlife to return to the site.
- I request that no concrete swales or channels be installed in the Habitat Preserve Area. Conditions CR-97-0469 CPC's 96-0243 CU and 96-0241 CUB Angeles National Golf Course
- I request that Conover Fire Road be resurfaced with decomposed granite or crusher fine limestone in conformance with trail construction standards acceptable to the Santa Monica Mountains Conservancy and the local Council District #2 Planning Office.
- I request that a minimum number of 24" box trees (Native species recommended by Santa Monica Mountains Conservancy) be planted at 25 foot intervals along Conover Street route from Foothill boulevard to the tank site and in Eby Canyon.
- Follow up plan and habitat restoration to remove *Arundo donax* (Giant Reed, and *Ricinus communis*(Castor bean) which may be spread and established in new areas due to excavation.

**e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

**Potentially Significant Unless Mitigation Incorporated** The area from the intersection of Foothill and Osborne and the Los Angeles National Golf Course are within the boundaries of the following preservation and may conflict with mitigation proposed by the following EIRs and plans

- Conditions of Use and Mitigation EIR SCH 1995051004 Canyon Hills Golf Course and 95-0286 CUC CU & VAC Conditions

- The San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan Section 8 Ordinance 175736 effective February 8, 2004.

-Rim of the Valley Corridor Proposed National Park and Rim of the Valley Trail Network Lead Agency City of Los Angeles Department of Engineering and Department of Recreation and Parks.

- Mitigation Required for Hansen Dam Soccer Complex SCH 2002021137 February 2002
- Master Mitigation Plan for the Big Tujunga Wash Mitigation Bank Lead Agency County of Los Angeles Department of Public Works- Quarterly Water Quality Monitoring Reports and interested parties.

I request that an extension of the comment period be granted to compare the project proposal and determine if any conflicts exist.

**f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional or state habitat conservation plan?**

There are over 370 Conditions for the Canyon Hills Golf Course in EIR SCH 1995051004 and contained in 95-0286 including a 200 acre Habitat Preservation Area dedication to the Santa Monica Mountains Conservancy. The Conover Fire Road and site of the 1 Million Gallon Tank are within this area.

There are three areas of concern directly impacted by the proposed construction.

1) Little Tujunga Creek Crossing (unlined natural channel)

This is an established wildlife corridor that supports the frequent use by deer and other large mammals down to the fresh water in Hansen Dam. This opinion is supported by the 2002 EIR study completed for the Hansen Dam Soccer Complex (State Clearing House 2002021137 Pg 26 Wildlife Movement Corridors)

Mitigation Requested

- Allow for nocturnal passage of (large mammals) wildlife without obstruction for the period of construction.
- Follow up plan and habitat restoration to remove *Arundo donax* which may be spread and established in new areas due to excavation.
- Restoration of the Recreational Trail under Foothill Boulevard to Clybourn Avenue affected by construction.

2) Proposed Staging area south of Wheatland and Interstate 210 Freeway

This is a breeding and feeding area for Black Tailed Jackrabbits. Disturbance of this area by a staging area could result in significant adverse effects to wildlife within this project staging area and immediate vicinity.

This Potentially Significant impact could be avoided by choosing an alternate staging area and noting that staging or parking of any kind in this area is prohibited at the Wheatland offramp.

Mitigation Requested

- The Osborne offramp be designated as the preferred construction transportation route and Sunland Boulevard offramp be designated as an alternate. Note to contractors that staging or parking of any kind is prohibited at the Wheatland offramp.

3) Conover Fire Road and Tank construction area

The development of the tank location and 12 month construction cycle may permanently decrease use of the area as a local movement corridor and habitat area. This is an established portion of territory for deer, mountain lion and bobcat. See: Chambers Group list of Observed Species. This area is not developed and an impact would mostly result from the increased noise and human presence during construction. The plateau above the Tujunga Wash provides grazing for prey animals and hunting areas for predators including a large population of raptors.

Requested Mitigation

- I request that the tank be installed completely underground.
- I request that the habitat disturbed by construction be restored with native forbs and grasses, bushes and trees (Including native oaks).
- I request that stormwater runoff be collected on site and a "bubbler" be installed to entice wildlife to return to the site.
- I request that no concrete swales or channels be installed in the Habitat Preserve Area. Conditions CR-97-0469 CPC's 96-0243 CU and 96-0241 CUB Angeles National Golf Course
- I request that the retaining walls and engineered slopes (described in section VI. GEOLOGY AND SOILS- iv. - Landslides) be entirely disguised to minimize the impact of their construction and the operation of the tank facility.
- I request that Conover Fire Road be resurfaced with decomposed granite or crusher fine limestone in conformance with trail construction standards acceptable to the Santa Monica Mountains Conservancy and the local Council District #2 Planning Office.
- I request that a minimum number of 24" box trees (Native species recommended by Santa Monica Mountains Conservancy) be planted at 25 foot intervals along Conover Street route from Foothill boulevard to the tank site and in Eby Canyon.
- I request follow up plan and habitat restoration to remove *Arundo donax* (Giant Reed, and *Ricinus communis* (Castor bean) which may be spread and established in new areas due to excavation.

**IX. LAND USE AND PLANNING-- WOULD THE PROJECT;**

**b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigation an environmental effect?**

The proposed project is partially located (from the intersection of Osborne and Foothill Boulevard) within an area that is described by the Environmental Element of the City of Los Angeles General Plan (adopted in 2001) as a rural/agricultural area worthy of preservation. This is also reflected in the Sunland-Tujunga Shadow Hills Lake View Terrace Community Plan which describes this as an area predominantly zoned RA, RE and A. The area contains a special Use "K" district overlay.

There are over 370 Conditions for the Canyon Hills Golf Course in EIR SCH 1995051004 and contained in 95-0286 including a 200 acre Habitat Preservation Area dedication to the Santa Monica Mountains Conservancy. The Conover Fire Road and site of the 1 Million Gallon Tank are within this area.

The San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan Section 8 Ordinance 175736 effective February 8, 2004.

-Rim of the Valley Corridor Proposed National Park and Rim of the Valley Trail Network Lead Agency City of Los Angeles Department of Engineering and Department of Recreation and Parks.

I request that an extension of the comment period be granted to compare the project proposal and determine if any conflicts exist.

**c) Conflict with any applicable habitat conservation plan or natural community conservation plan?**

See above comment and request.

**XIII PUBLIC SERVICES**

**a) Would the project result in substantial adverse physical impacts associated with the provision or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

During the three year construction period, Glenoaks Boulevard and Foothill Boulevard will be impacted. The ability to access intersecting streets, communities and public facilities may be limited to a single route via one of these two streets. Intersections and government facilities that have no other access and will possibly be isolated during construction that should be noted are:

- MTA Yard Corner of Branford and Glenoaks
- Entrance to Hansen Dam Golf Course Montague and Glenoaks
- Homes located beyond intersection of Kagel Canyon and Foothill
- Homes located beyond intersection of Gladstone and Foothill
- Access to Little Tujunga Canyon, Kagel Canyon, and Middle Ranch Communities and Homes and Angeles National Forest accessed at the intersection of Osborne and Foothill.
- Homes located beyond intersection of Clybourn and Foothill

- Valley View Vaulters, Worldwide Exotics Nursery and the Hansen Dam Equestrian Center located south of Orcas Avenue and Foothill
- Homes located south beyond the intersection of Christy Avenue and Foothill Boulevard
- Homes located on Palomino Ct north of Foothill Boulevard
- Mini Mall entrance located on Wheatland between Foothill Boulevard and the 210 Freeway
- Homes, Flood Control Debris Basin and Fire Road located north of the intersection of Esko Ave and Foothill Blvd
- Homes and Flood Control Debris Basin located in Oliver Canyon north of Foothill Blvd
- Homes and All Nations Church located at Foothill Place and Foothill Blvd

I request that special care be given along the route to never block these critical access points for extended periods of time. Access to these areas will be severely limited during the three year construction period and those suffering the impacts will receive no benefit or increased services from the project unless there is mitigation.

I request that the affected residents be notified by phone or fax at least 48 hours prior to construction and dates and times of construction and the duration in hours when access will be interrupted.

I request mitigation for the extreme inconvenience which will be in both the severity of blocked access and the duration of time (three years). I request a natural surface recreational trail (including a landscaped buffer between the street and the trail) be constructed along the south side of Osborne Street from the intersection of Osborne and Glenoaks to the Hansen Dam Overlook in Council District #7 and along the north side of Foothill from the intersection of Osborne Street to Wheatland Avenue in Council District #2.

Limint

#### **XV. TRANSPORTATION/TRAFFIC**

The proposed project is partially located (from the intersection of Osborne and Foothill Boulevard) within an area that is described by the Environmental Element of the General Plan (adopted in 2001) as a rural/agricultural area worthy of preservation. This is also reflected in the Sunland-Tujunga Shadow Hills Lake View Terrace Community Plan which describes this as an area predominantly zoned RA.

There will be substantial impacts to transportation routes whose only ingress and egress is via Foothill Boulevard. These intersections are noted above in the Public Services Comment. Foothill Boulevard is not only a Major Class II Highway, it is the ONLY way to reach certain residences located along the route. Work along Foothill Boulevard will affect residents during the entire period of construction.

- I request that special care be given along the route to never block these critical access points for extended periods of time. Access to these areas will be severely limited during the three year construction period and those suffering the impacts will receive no benefit or increased services from the project unless there is mitigation.
- I request that the affected residents be notified by phone or fax at least 48 hours prior to construction and dates and times of construction and the duration in hours when access will be interrupted.
- I request mitigation for the extreme inconvenience which will be in both the severity of blocked access and the duration of time (three years). I request a greenway and recreational trail (including a landscaped buffer between the street and the trail) be constructed along the south side of Osborne Street from the intersection of Osborne and Glenoaks to the Hansen Dam Overlook in Council District #7 and along the north side of Foothill from the intersection of Osborne Street to Wheatland Avenue in Council District #2.



## **XVI. UTILITIES AND SERVICE SYSTEMS**

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

**Potentially Significant Unless Mitigation Incorporation.** This is a rural neighborhood with sufficient open space within the Tujunga Watershed to absorb storm water during all but the most significant storm events. There are no stormwater drainage facilities provided along much of the proposed alignment and surrounding vicinity. This includes an absence of curbs and gutters. The capacity of the stormwater drainage facilities is therefore limited to surface facilities and prone to entering private residences and driveways. Any dewatering during construction will impact as street runoff along the route before finally draining into the Tujunga Wash.

I request that dewatering be monitored to avoid water running for prolonged distances or into private residences along the proposed route.

## **XVII. MANDATORY FINDINGS OF SIGNIFICANCE**

a) **Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or pre history?**

**Potentially Significant Impact Unless Mitigated.** As noted in other sections, the impact areas are limited to 1) Little Tujunga Creek Crossing, 2) Proposed staging area at Wheatland south of Interstate 210 freeway and 3) Conover Fire Road and one acre Tank site. While these locations represent a fraction of the proposed route, they represent disruption of the only 3 passages from San Gabriel Mountains of the Angeles National Forest to Hansen Dam, a permanent water source for large mammals. A one year disruption of the Black Tailed Jack Rabbit area at site 2) could possibly disrupt breeding and permanently affect population of that species. Site 3) will be under construction for over a year and is the location of a Habitat Preservation Area set aside for the benefit of numerous species and required to be dedicated to the Santa Monica Mountains Conservancy. All three sites provide a functional wildlife corridor that would be fragmented during construction.

Mitigation should be required

### **Requested Mitigation**

- I request that the tank be installed completely underground.
- I request that the habitat disturbed by construction be restored with native forbs and grasses, bushes and trees (including native oaks).
- I request that stormwater runoff be collected on site and a "bubbler" be installed to entice wildlife to return to the site.
- I request that no concrete swales or channels be installed in the Habitat Preserve Area. Conditions CR-97-0469 CPC's 96-0243 CU and 96-0241 CUB Angeles National Golf Course
- I request that the retaining walls and engineered slopes (described in section VI. GEOLOGY AND SOILS- iv. - Landslides) be entirely disguised to minimize the impact of their construction and the operation of the tank facility.
- I request that Conover Fire Road be resurfaced with decomposed granite or crusher fine limestone in conformance with trail construction standards acceptable to the

Santa Monica Mountains Conservancy and the local Council District #2 Planning Office.

- I request that a minimum number of 24" box trees (Native species recommended by Santa Monica Mountains Conservancy) be planted at 25 foot intervals along Conover Street route from Foothill boulevard to the tank site and in Eby Canyon.
- I request follow up plan and habitat restoration to remove *Arundo donax* (Giant Reed, and *Ricinus communis*(Castor bean) which may be spread and established in new areas due to excavation.

**b) Does the project have impacts that are individually limited, but cumulatively considerable?**

**Potentially Significant Impact Unless Mitigation Incorporation**

There are a substantial number of projects along the proposed route not undertaken by the LADWP as Lead agency. The construction timetables of these projects run concurrently with the time table for this project. Generated truck traffic and vehicular traffic associated with construction worker travel, as well as lane closures could elevate the impacts of concurrent construction unless coordinated.

Projects with already approved EIR's listed on the State of California Website that are expected to be funded, bid and started within the time frame of this project include:

Hansen Dam Soccer Complex Phase II City of Los Angeles Department of Recreation and Parks SCH 2002021137 February 2002

Sun Valley Watershed Management Plan County of Los Angeles Department of Public Works SCH 2002111051 October 2003

Hansen Dam Mastr Plan and Environmental Impact Statement, LACDA, CA Corps of Engineers Los Angeles District

Various mitigation maintenance and construction

Los Angeles Children's Museum City of Los Angeles, Bureau of Engineering SCH 20000041091 April 19 2000

Canyon Hills Golf Course Clubhouse construction Angeles National Golf Club SCH 1995051004

Possible reactivation of

Water Conservation and Supply Feasibility Study – Hansen Dam and Draft Environmental Impact Statement/Report U S Army Corps of Engineers Los Angeles District

Signed,

Mary Benson

11070 Sheldon Street

Sun Valley Ca 91352

Member of the Tujunga Watershed Council and Stakeholders

Member of the Sun Valley Watershed Stakeholders Group

Member of the Lopez Canyon Green Waste Community Facility Task Force

Member of the East Valley Coalition

FEBRUARY 11 2004  
10AM TO 3:30PM

TOUR began at 11070 SHELDON ST

1. COMMENT - ENGINEERING  
LOCATION OF TERMINUS OF RECYCLING WATER  
TUJUNGA WASH & GLENOAKS  
NORTH SIDE OF TUJUNGA WASH
2. COMMENT - TRAFFIC  
LOCATION OF MTA YARD  
BRANFORD AND GLENOAKS
3. COMMENT - TRAFFIC & ENGINEERING  
NO SHOULDER & SOIL STABILITY  
OSBORNE & GLENOAKS
4. COMMENT - MITIGATION REQUEST  
RECYCLED WATER FOR TOILETS  
PROPERTY OWNER ARMY CORPS OF ENGINEERS  
OSBORNE HANSEN DAM OVERLOOK
5. COMMENT - ALTERNATE STAGING AREA  
HANSEN DAM FLOOD CONTROL BASIN  
OSBORNE HANSEN DAM OVERLOOK
6. COMMENT - TRAFFIC & ENGINEERING  
JACKING FOR LOPEZ CANYON CHANNEL (CONCRETE LINED)  
LOPEZ CHANNEL & FOOTHILL
7. COMMENT - CUMULATIVE EFFECTS  
HANSEN DAM CHILDREN'S MUSEUM  
LOPEZ CHANNEL & FOOTHILL
8. COMMENT- TRANSPORTATION  
POSSIBLE ISOLATION - NO OTHER OUTLET  
KAGEL CANYON & FOOTHILL
9. COMMENT - CUMULATIVE EFFECTS  
HANSEN DAM BOUNDLESS PARK  
STONEHURST & FOOTHILL
10. COMMENT - BIOLOGICAL RESOURCES  
BLACK WALNUT TREES  
HANSEN DAM SPORTS COMPLEX  
FOOTHILL BLVD

11. COMMENT – STAGING AREA  
HANSEN DAM SPORTS COMPLEX

12. COMMENT – CUMULATIVE EFFECTS  
HANSEN DAM SOCCER COMPLEX  
PHASE II  
FOOTHILL BLVD

13. POTENTIAL CUSTOMERS (OPTIONAL)  
LOPEZ LANDFILL – GLEN HAVEN & SHALOM MORTUARIES

14. COMMENT – BIOLOGICAL & ENGINEERING  
DISRUPTION OF WILDLIFE CORRIDOR  
CROSSING LITTLE TUJUNGA WASH (unlined natural drainage)  
LITTLE TUJUNGA WASH CROSSING (Soccer EIR SCH 20021137)  
CLYBOURN & FOOTHILL

15. COMMENT – TRANSPORTATION/TRAFFIC  
OMISSION OF NUMEROUS LOCATIONS of Public Facilities WITHIN ½ MI RADIUS  
SCE POWER EASEMENT  
DELPHI ACADEMY  
MACLAY MIDDLE SCHOOL  
FENTON AVE CHARTER SCHOOL  
PHOENIX HOUSE (DRUG TREATMENT CENTER) Eldridge & Kagel  
( 3)SANITARIUMS Eldridge & Kagel  
VALLEY VIEW VAULTERS  
Handicap (Lanternman Funding) RECREATIONAL THERAPY Orcas & Foothill  
HANSEN DAM EQUESTRIAN CENTER  
ALL NATIONS CHURCH

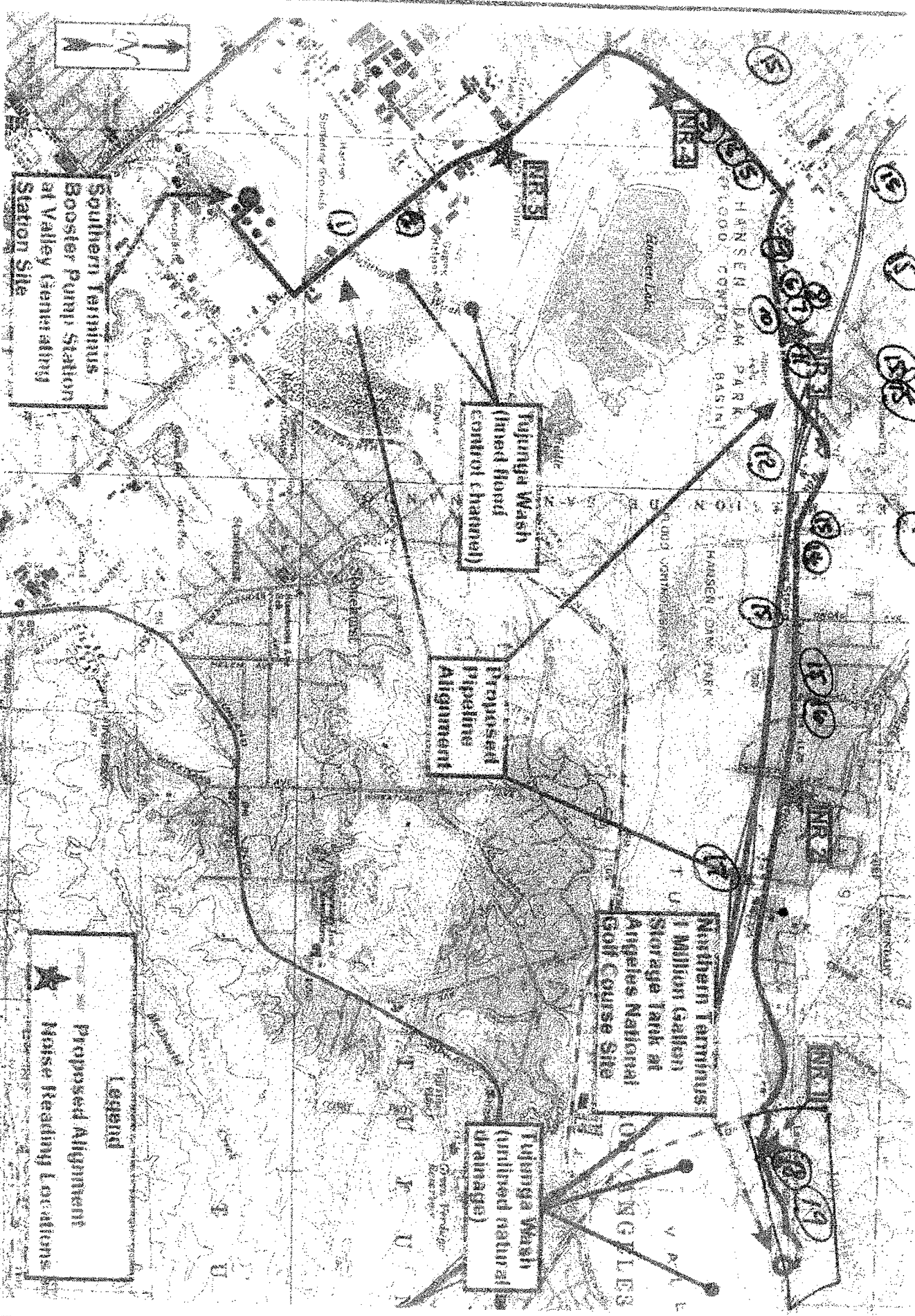
16. COMMENT – MITIGATION REQUEST  
OFFER "RESIDENTIAL" AND COMMERCIAL CUSTOMERS  
ABILITY TO HAVE UNMETERED WATER UNTIL COMPLETION OF  
PROJECT & THEN TO PURCHASE WATER AT MINIMUM RATE  
See Above

17. COMMENT –BIOLOGICAL  
PROXIMITY TO TUJUNGA PONDS COUNTY MITIGATION BANK  
"UNDISTURBED HABITAT LOCATION ARROYO SCRUB HABITAT"  
WHEATLAND & 210 FREEWAY

18. COMMENT – AESTHETIC  
SAN GABRIEL/VERDUGO MOUNTAINS SCENIC PRESERVATION SPECIFIC PLAN  
ORD 175736 EFFECTIVE 2-8-2004

19. COMMENT – BIOLOGICAL  
200 ACRE PENDING DEDICATION OF HABITAT PRESERVATION AREA  
CONDITIONS OF ANGELES NATIONAL GOLF CLUB  
CR 97-0469  
CPC's 96-0243 CU  
96-0241 CUB

Area east of Foothill Blvd and Conover intersection is a pending Habitat Preservation Area.



**Southern Terminus  
Booster Pump Station  
at Valley Farming  
Station Site**

**Tujianga Wash  
(lined flow  
control channel)**

**Proposed  
Pipeline  
Alignment**

**Northern Terminus  
1 Million Gallon  
Storage Tank at  
Angeles National  
Golf Course Site**

**Tujianga Wash  
(undrained natural  
drainage)**

**Legend**  
 ★ Proposed Alignment  
 ★ Noise Hearing Locations

Scale 1/4

1/4 = 0.5 mile

LOS ANGELES DEPARTMENT OF WATER AND POWER  
 HARBOR AREA WATER REPLEVISION PROJECT

**Proposed Alignment**

DATE: 10/11/01  
 DRAWN BY: [illegible]  
 CHECKED BY: [illegible]  
 APPROVED BY: [illegible]

COM

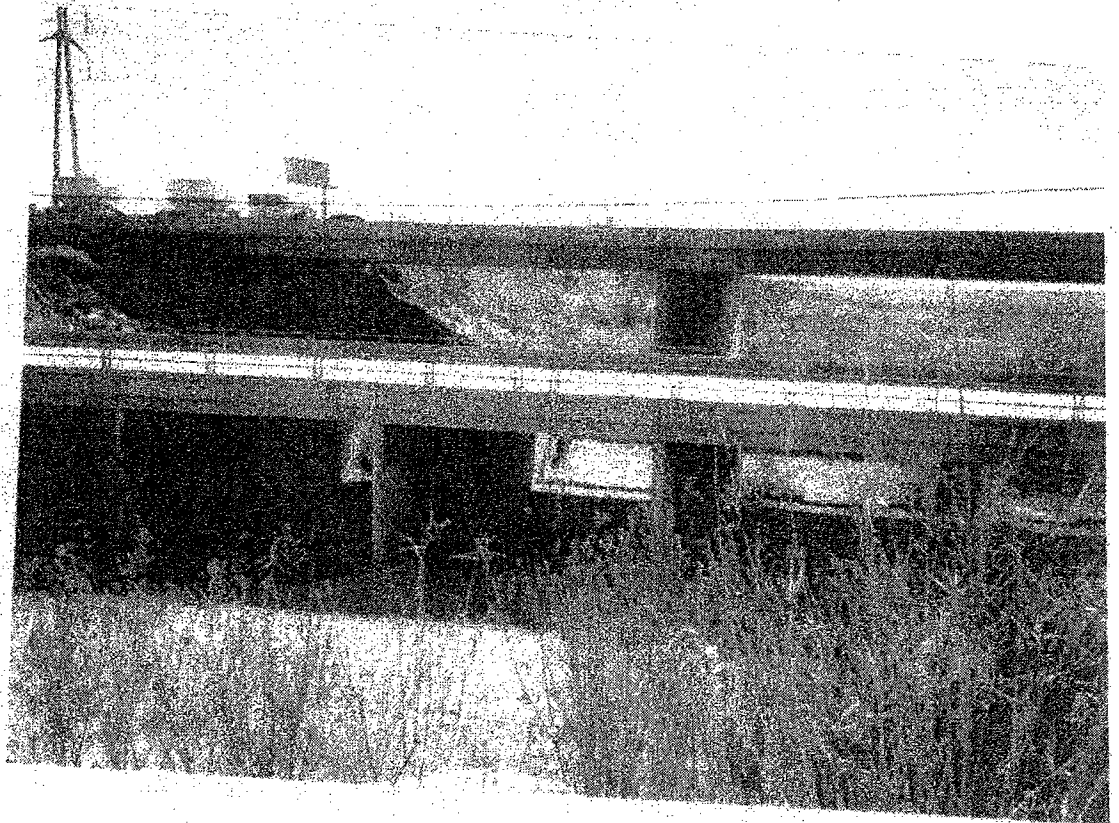
Figure 2



3

Osborne &  
Hansen Overlook

note dangerous  
narrow path  
and erosion  
onto golf course

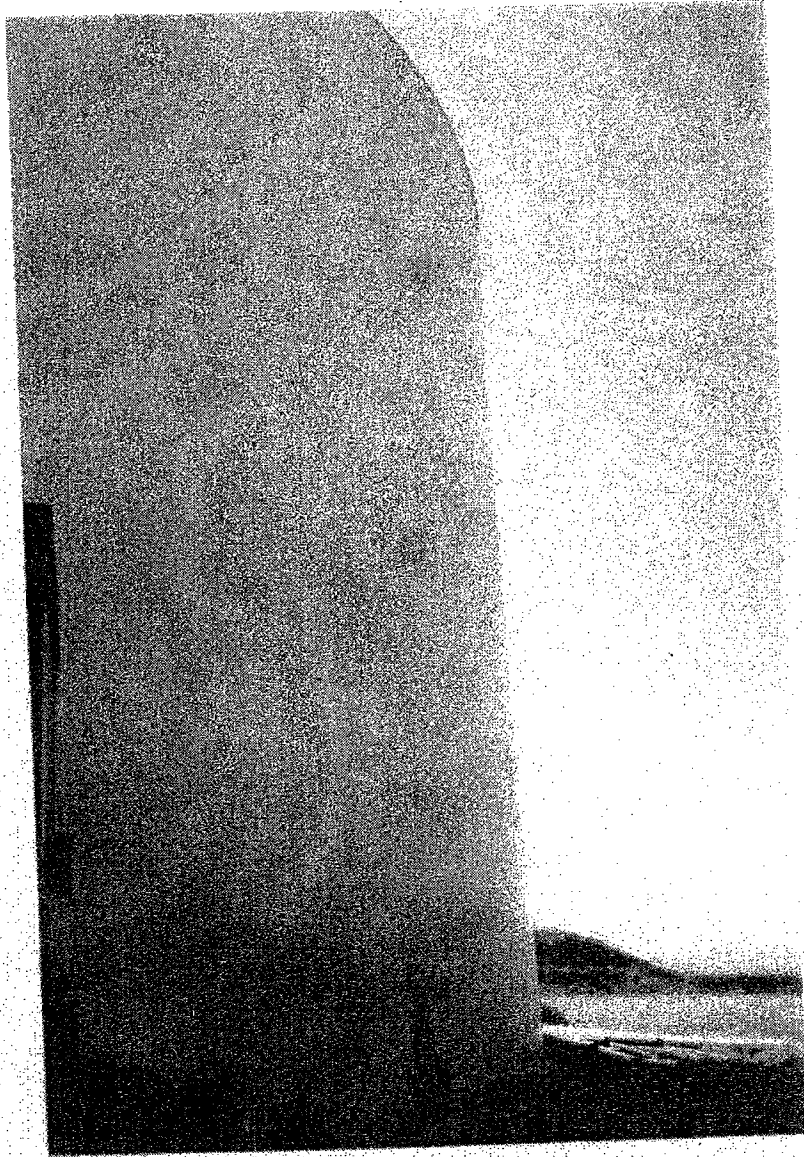


4

LOOKING  
SOUTH INTO  
HANSEN DAM  
FROM LITTLE  
TUJUNGA CREEK

WILDLIFE  
MIGRATION  
CORRIDOR

FOOTHILL BLVD IN FOREGROUND  
210 FREEWAY IN BACKGROUND



TOUR  
ITEM

(B)

1 MILLION GALLON TANK IN OPERATION USING  
POTABLE WATER AT LOPEZ CANYON  
LANDFILL & RECYCLING FACILITY (PILOT PROJECT STAGE)

ESTIMATED USAGE AT PROJECT COMPLETION - 3 MILLION  
GALLONS PER MONTH

17

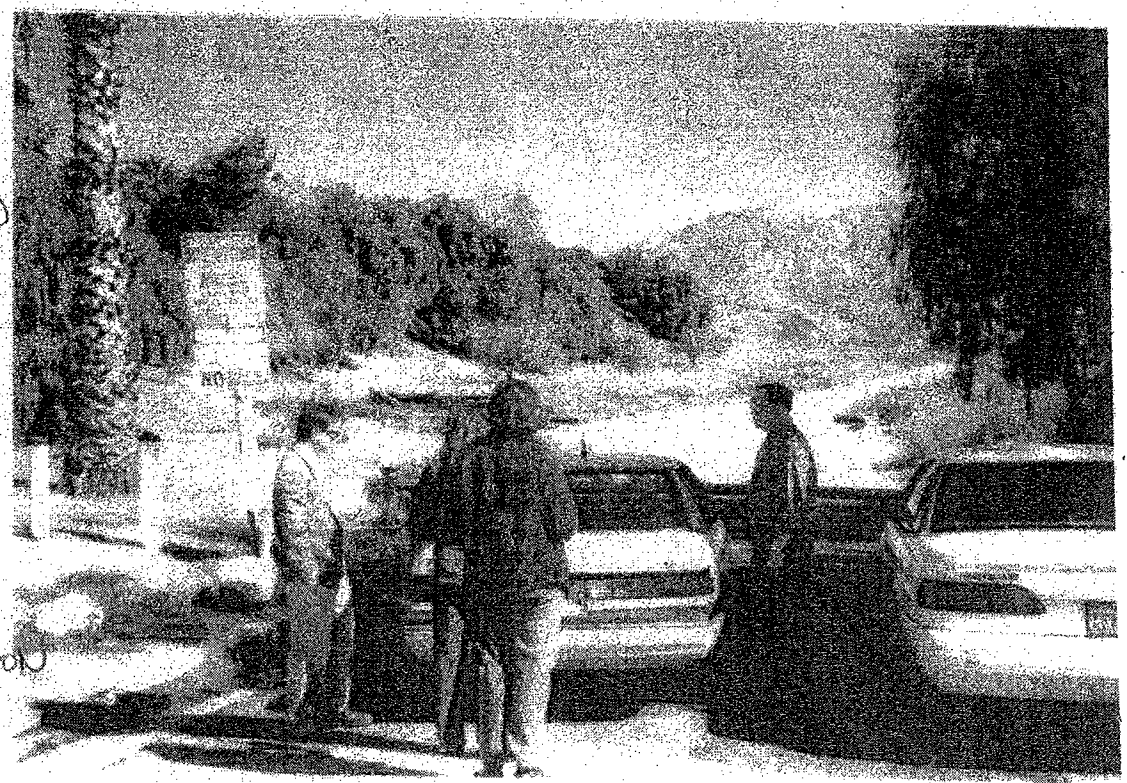
HIGH QUALITY  
BLACK TAIL  
JACK RABBIT  
HABITAT  
UNDER  
DWD  
EASEMENT



YUCCA WHIPPS and SYCAMORES

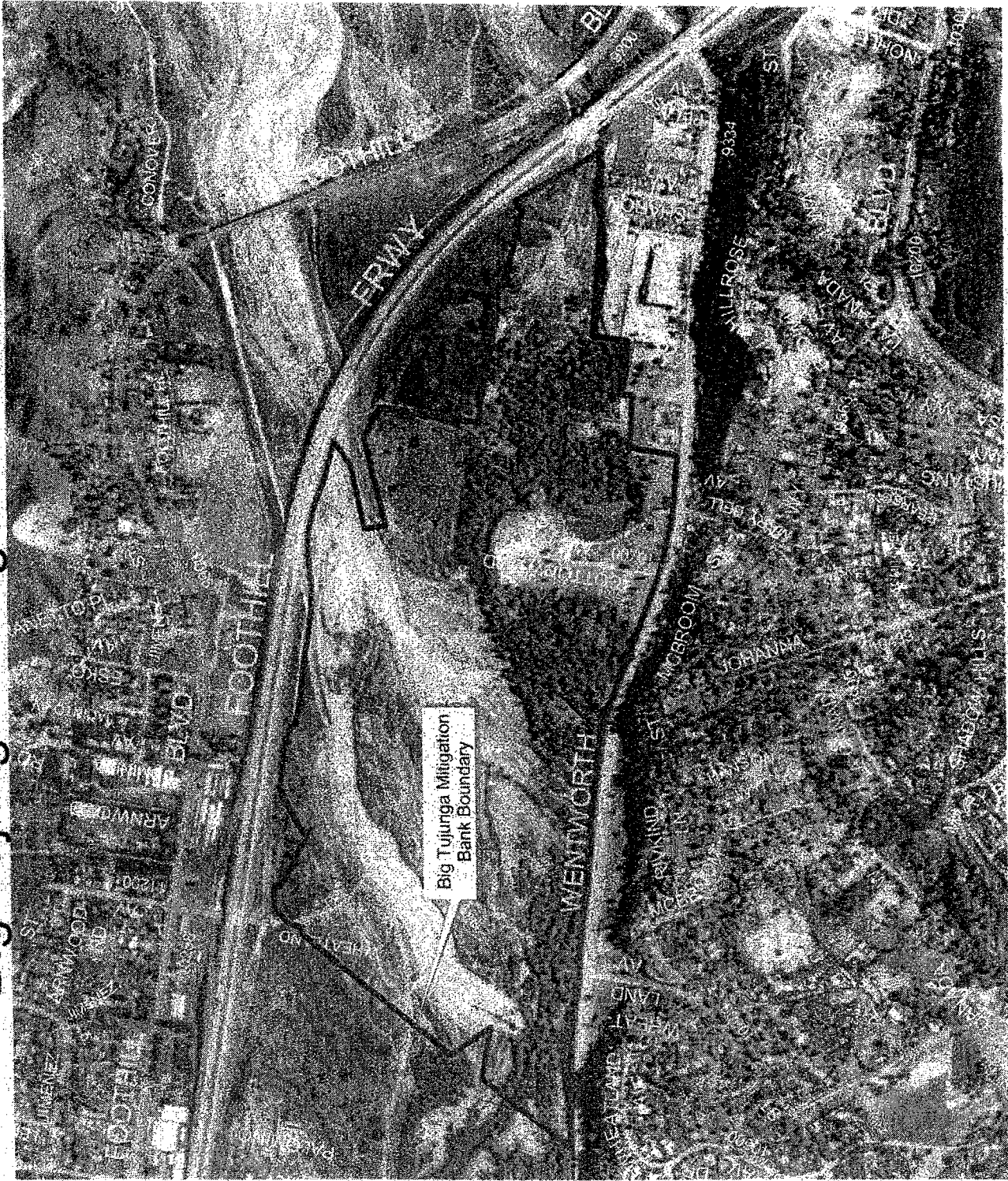
19

CONOVER STREET  
NOTE UNIMPROVED  
AND RESTRICTED  
ENTRY SIGN  
&  
LOCKED GATE  
SITE OF  
NOTED 200 ACRE  
DEDICATION AS  
HABITAT CONSERVATION  
AREA

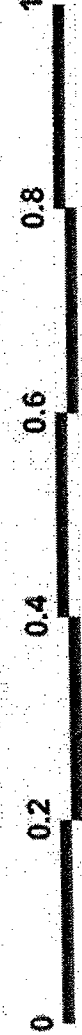




# Big Tujungua Mitigation Bank



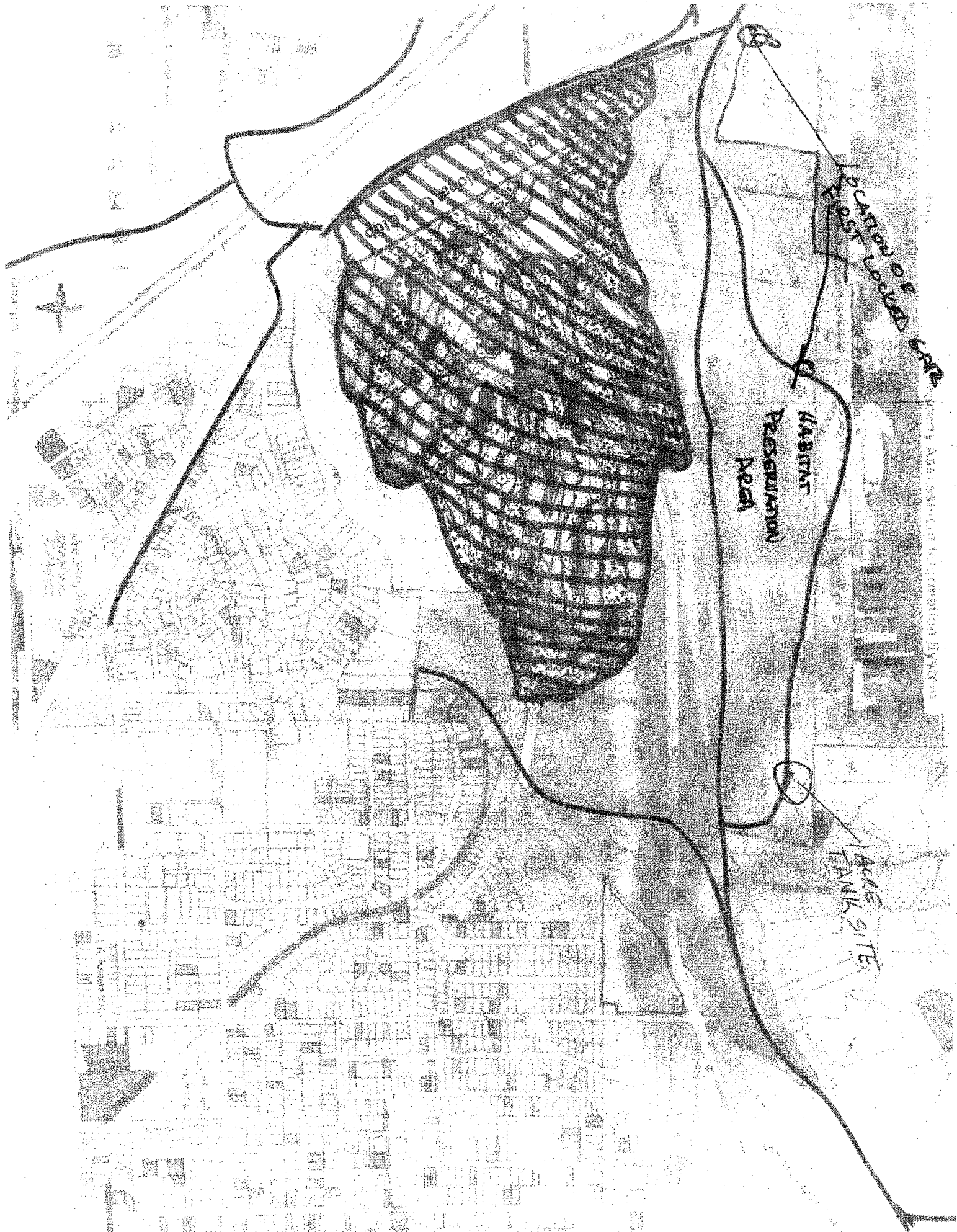
1 Miles



TOUR

COMMENT 17





LOCATION OF PROPOSED GATE

HABITAT PRESERVATION AREA

WATER TANK SITE





Los Angeles Children's Museum - Hansen Dam Site

SCH Number: 2000041091

Type: Neg

Project Description

This report considers the potential environmental effects of the proposed Los Angeles Children's Museum relocation. The Children's Museum is considering a number of sites for relocation; this site is one of six. Individual environmental documents are being prepared and circulated for each site. The proposed project entails relocation and expansion of the existing Los Angeles Children's Museum from downtown Los Angeles. Project implementation would involve the construction and operation of a proposed 2-story, 60,000 square-foot children's museum, parking, landscaping and apprentices. The project will benefit youth and families of the City of Los Angeles, by providing an interactive museum open to all.

Project Lead Agency

Los Angeles Bureau of Engineering

Contact Information

Primary Contact:

Neil Ducker  
City of Los Angeles, Bureau of Engineering  
21326478695  
650 S. Spring Street  
Suite 700  
Los Angeles  
CA, 90014

Project Location

County: Los Angeles  
City: Sun Valley, Lake View Terrace, Los Angeles, City of  
Region:  
Cross Streets: Osborne, Foothill, Stonehurst  
Parcel No: 2528-002, 2528-001-001  
Township:  
Range:  
Section:  
Base:  
Other Location Info:

Proximity To

Highway: 210  
Airport: Whiteman  
Railways: SP/RR  
Waterways: Hansen Dam Lake / Recreation Center  
Schools: Finkon Avenue Elementary School  
Land Use: The site is zoned CR, limited commercial. The project is consistent with, and allowable under, current zoning.

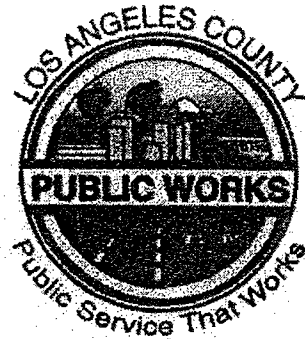
Development Type

Recreational

11/11/02 10:00 AM

0001

**COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS**



**Draft  
Program Environmental Impact Report  
Sun Valley Watershed Management Plan**

**SCH No. 2002111051**

**October 2003**

**MWH  
301 North Lake Avenue, Suite 600  
Pasadena, California 91101**

**DRAFT ENVIRONMENTAL ASSESSMENT/INITIAL STUDY**

**Hansen Dam Soccer Complex**

**City of Los Angeles**  
**Department of Recreation and Parks**  
200 North Main Street, Room 709, CHE  
Los Angeles, CA 90012

Contact:  
David Attaway  
Environmental Supervisor  
(213) 485-6178

Paul Davis  
Environmental Specialist  
(213) 847-9247

**U.S. Army Corps of Engineers**  
**Los Angeles District**  
**Operations Branch**  
911 Wilshire Blvd.  
Los Angeles, CA 90012

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Prepared with the assistance of:

The Planning Center  
1580 Metro Drive  
Costa Mesa, CA 92626

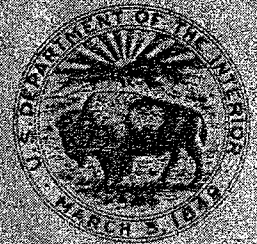
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# Scour and Fill in Tujunga Wash— A Fanhead Valley in Urban Southern California—1969

1969

GEOLOGICAL SURVEY PROFESSIONAL PAPER 732-B

*Prepared in cooperation with the  
California Department of  
Water Resources*



SCOUR AND FILL IN TUJUNGA WASH—A FANHEAD VALLEY IN URBAN SOUTHERN CALIFORNIA—Geological Survey Professional Paper 732-B



ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Mary Benson  
11070 Sheldon Street  
Sun Valley, CA 91352

Dear Ms. Benson:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** On February 11, 2004, I met with Mr. Valentin Amezcuita and Mr. Steven Ott of the Los Angeles Department of Water and Power (LADWP) and toured the proposed route of this project. I wish to thank them for taking the time to voice my concerns.

**Response:** Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

**Comment 2:** I could not find this project listed on the CEQA website database. The comment period is due to expire Friday, and I expected a project of this magnitude to be listed here. Does the Los Angeles Department of Water and Power (LADWP) have another EIR with a different project name in the CEQA database?

**Response:** The proposed project does not have another EIR with a different project name. On February 26, 2004, after receiving your letter, we contacted the State Office of Planning and Research, State Clearinghouse, to address your concern that the project was not listed on the CEQA website data. State Clearinghouse staff indicated that they had received the IS/MND, had logged it in on January 28, 2004, and given it a State Clearinghouse Number 200401129. Staff at the State Clearinghouse did not know why the database did not show the project as it was in their system. LADWP has since tried the CEQA website and found the IS/MND listed.

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

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



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**Comment 3:** I asked Mr. Amezquita about notices mailed to residences along Foothill Boulevard in Lake View Terrace. I specifically asked, because many homes with hundreds of feet of frontage along this street actually have addresses on cross street. I noted one address with over 100 feet of frontage along Foothill: 11295 Orcas Avenue, Lake View Terrace, CA 91342. He told me it was not on the notification list, but assured me he would send one to this address. This is the home of the Valley View Vaulters, a recreational therapy venue for handicapped and home-schooled children whose only access is via Foothill Boulevard. There are dozens of residences whose only access is via Foothill Boulevard. Shouldn't these residents be given an extended period to comment?

**Response:** LADWP followed the California Environmental Quality Act (CEQA) noticing requirements, per the CEQA Guidelines, as they pertained to distribution of an IS/MND. As stated in CEQA Guidelines Section 15072(b), the lead agency shall mail a notice to all organizations and individuals who have previously requested such a notice in writing and shall also give notice by at least one of the following methods: 1) publication in a newspaper of general circulation in the area affected; 2) posting of notice on and off site in the area; or, 3) direct mailing to the owners and occupants of contiguous property. LADWP submitted a notice of intent for the proposed project to both Los Angeles County Clerk and Los Angeles City Clerk on January 29, 2004. LADWP also published the notice in the *Los Angeles Times* on Thursday, January 29, 2004. In addition to sending notices to responsible agencies, LADWP, as is standard practice, sent notices to occupants whose address was along the proposed project alignment. As promised, a notice was subsequently mailed to 11295 Orcas Avenue. Since your meeting with Mr. Amezquita, the review period for the document was extended until July 21, 2004, for a total of 175 days of public review.

Regarding access for residences along Foothill Boulevard, it is LADWP standard construction practice to maintain egress and ingress at all times for residences and emergency response vehicles.

**Comment 4:** There is an entire community in the unincorporated area of the County of Los Angeles that was not notified. This is the Community of Riverwood Ranch. This is important because they are the next-door neighbors whose lots directly abut property owned by the Angeles National Golf Club. Their community is directly adjacent to the proposed 1 million gallon tank. Why weren't they mentioned in the Project location?

**Response:** The project location lists those communities adjacent to the proposed project as identified in the appropriate City of Los Angeles Community Plan. On March 3, 2004, LADWP staff met with residents of Riverwood Ranch to discuss the project.



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**Comment 5:** Conover Fire Road and the 1 million gallon recycled water tank are located within a pending dedication as a Habitat Preserve Area which will be deeded to the Santa Monica Mountains Conservancy (SMMC). The SMMC was not noted as a state agency having an interest in the proposed project.

**Response:** Although the location of the storage tank has been proposed within an area slated to be offered to the SMMC for future dedication by the Angeles National Golf Club (ANGC), the location of the tank would not conflict with the proposed habitat preserve dedication. Prior to the dedication of land to the SMMC, the ANGC is expected to dedicate easements for necessary roads and utilities in the area. The proposed tank site would be dedicated by the ANGC to LADWP under a utility easement as part of this process. This dedication would not interfere with or affect ANGC's ability to meet their obligations to the City of Los Angeles or the SMMC as specified in their Conditional Use Permit.

**Comment 6:** The project construction will cross a wildlife corridor at the Little Tujunga Wash. This area is designated as Environmentally Sensitive Area (ESA) by the County of Los Angeles. This was confirmed with information from the website of the Wetlands Recovery Project. These are designated as a rural/agricultural area worthy of preservation in the Environmental Element of the Los Angeles General Plan.

**Response:** The portion of the project that crosses the Tujunga Wash, Significant Ecological Area (SEA) 24 designated by the County of Los Angeles, is along Glenoaks Boulevard. (The County of Los Angeles has no known designation of "Environmentally Sensitive Areas.") The pipeline will be mounted to the underside of the existing bridge on Glenoaks Boulevard over the Tujunga Wash, and thus, it would not impact the wash or SEA. As addressed in detail in Section IV and Appendix B of the IS/MND, SEAs, and specifically SEA 24, were addressed and no significant impact is anticipated to occur because of the proposed project. There is no Environmental Element of the Los Angeles General Plan. There is however a Conservation Element, which encourages the retention of parcels for agricultural and low density land use and zoning, as well equine areas. The Conservation Element does not designate any proposed project area as rural/agricultural worthy of preservation. As stated throughout the IS/MND, the existing zoning and land use (as shown in the Arleta-Pacoima and Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plans) along the proposed project alignment is industrial (e.g., LADWP Valley Generating Station [VGS]), open space (e.g., Hansen Dam Recreation Area), commercial, residential, and public facilities. No areas adjacent to the proposed project were designated as rural/agricultural. The project as proposed would occur in public rights-of-way and would not change or impact any existing zoning or land use.

**Comment 7:** The San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan affects the project from the intersection of Foothill and Osborne to the 1 million gallon (MG) tank location. Foothill Boulevard is designated as a Scenic Highway Corridor in the Plan. The proposed staging location south of the 210 freeway at the Wheatland off ramp is designated as the Vista Point.

**Response:** The IS/MND has been revised to include a discussion of the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan (Specific Plan), which went into effect on February 8, 2004. The Specific Plan sets forth provisions for Prominent Ridgeline and Scenic Highway Corridor protection. The proposed water tank would not be in violation of any of the provisions of the Specific Plan. The proposed location of the tank along the Conover Fire Road is not within a designated Prominent Ridgeline or within an area 60 vertical feet from a Prominent Ridgeline. The linear portion of the proposed project would follow portions of Foothill Boulevard designated as a Scenic Highway Corridor, but there are no provisions in the Specific Plan that prohibit construction or operation of infrastructure within the scenic corridor. Also, there would be no visual impacts of the storage tank from the scenic corridor as the corridor area provisions extend 500 feet on either side of the centerline of the roadway of each of the Scenic Highways and the proposed tank would be approximately 0.5 miles from Foothill Boulevard.

In addition, though designated as a future vista point, the Specific Plan does not preclude temporary construction activities from occurring at the I-210/Wheatland off ramp. However, LADWP will not utilize the I-210 Wheatland exit as a staging area. As you suggested in the field, an alternate staging area in close proximity to the proposed I-210/Wheatland exit has been proposed. This new staging area is adjacent to the Hansen Dam Sports Complex and is currently leased by Valley Crest Tree Company for tree storage. LADWP proposes to use this site instead of the I-210/Wheatland site. If this site is unavailable, then LADWP proposes to use another site in close proximity to the proposed project alignment but not the I-210/Wheatland site.

**Comment 8:** The area east of Foothill Boulevard and Conover intersection is pending dedication as a Habitat Preservation Area. The 1 MG tank location is within this area.

**Response:** Please refer to Response for Comment 5 above.

**Comment 9:** The Angeles National Golf Course is a privately owned facility located in the Tujunga Valley, in the community of Sunland and not in the community of Lake View Terrace in the eastern San Fernando Valley.

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**Response:** The IS/MND does not specifically call out the exact community in which the golf course is located. The environmental documents for the golf course indicate that the proposed project, located at 9401 Foothill Boulevard, is in the Sunland-Tujunga-Lake View Terrace-Shadow Hills District Plan, which corresponds to the community planning area assumed in the IS/MND. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

**Comment 10:** The LADWP VGS site is also the location of another project using recycled stormwater runoff. Future benefits and uses derived by implementation of this project may be duplications of benefits and uses cited by this plan. The project is known as the Sun Valley Watershed Management Plan. This plan has been in development for over 5 years and has monthly stakeholder meetings open to the public from inception.

**Response:** The County is looking at collecting stormwater runoff from several properties, one of which is the LA DWP VGS site. Under the Sun Valley Watershed Management Plan, any stormwater runoff collected would be used for: 1) infiltration for groundwater recharge; 2) reuse for gravel washing at the Vulcan Gravel Processing Plant; and 3) reuse for irrigation of landscaped areas at various locations. The Hansen Area Water Recycling Project is proposing to use tertiary treated recycled water from the Donald C. Tillman Water Reclamation Plant, not stormwater, for irrigation. Like stormwater runoff, recycled water use is regulated by the Regional Water Quality Control Board. However, recycled water must meet more stringent water quality requirements (e.g., Title 22 requirements) for use at the Hansen Dam Recreation Area and Angeles National Golf Club. Therefore, the proposed project and the County project are not duplicative of each other.

**Comment 11:** I disagree that the entire proposed project is located within an urbanized area in the City of Los Angeles. The Environmental Element of the City of Los Angeles General Plan designates this area as a rural/agricultural. It could be described as being in the urban/wildland interface.

**Response:** Please refer to Response for Comment 6 above.

**Comment 12:** The report fails to note that many streets in this area "dead-in" into the Angeles National Forest, San Gabriel Mountains or are "paper streets" that cross Little Tujunga Wash, Lopez Canyon Flood Channel (concrete lined), Hansen Dam Flood Control Basin or the 210 Freeway. Foothill Boulevard provides the ONLY ingress and egress to these communities.

**Response:** Prior to construction, LADWP would submit traffic control plans for approval to the Los Angeles Department of Transportation (LADOT) to ensure that traffic impacts, including impacts to public transportation routes such as "dead end" streets, are kept to a minimum. LADWP would comply with any requirements specified by LADOT. In Section 1.0 of the IS/MND, under Subsection 1.6 Construction Methods, starting on page 1-5, traffic control plans would be prepared in coordination with LADOT in order to maintain acceptable levels of service, traffic safety, and emergency access for the site vicinity during construction. As discussed in Section 3.0 of the IS/MND, under XV Transportation/Traffic, starting on page 3-48, for a temporary period during construction (approximately 3 months at one location), there would be minor alterations to the current traffic patterns. The pipeline would be installed in sections no longer than 500 feet (approximately the length of a short street block), within an approximately 1,200-foot work zone (up to a maximum of about 2,000 feet). After the installation of pipe within the work zone, the open trench in the street would be backfilled, paved, and returned to normal operation. Also, during construction activities, it is LADWP standard construction practice to maintain egress and ingress at all times for residences and emergency response vehicles.

**Comment 13:** The following facilities are located within a half-mile of the 6-mile alignment: Maclay Middle School, one private school (Delphi Academy) and two elementary schools (Fenton Charter School and Brainard Elementary School).

**Response:** The IS/MND notes the presence of several existing and proposed schools (please see page 2-2 and 3-26 of IS/MND), and the Maclay Middle School is specifically called out on page 3-56. The IS/MND has been revised to include the other schools located within one-quarter of a mile as addressed in the CEQA IS Checklist. The IS/MND does indicate in the impacts section that schools were considered in the analysis, but that construction and operation of the proposed project is not anticipated to have an adverse effect on these facilities, since construction activities and operation would not create long-term air, hazards, noise or traffic impacts. The addition of these schools does not change that determination.

**Comment 14:** Also within a one-half-mile impact area are treatment facilities including two sanitariums located near the intersection of Kagel Canyon and Eldridge plus the former Pacoima Memorial Hospital which is now Phoenix House, a major drug treatment facility at the corner of Eldridge and Terra Bella Streets in Lake View Terrace.

**Response:** The two sanitariums located near the intersection of Kagel Canyon and Eldridge are within the half-mile area of potential affect; whereas the Phoenix House at the corner of Eldridge and Terra Bella would be further than a half-mile from the

proposed project. The location of either of these sanitariums does not change the results of the IS/MND's impact analysis or conclusion that no significant impacts to sensitive receptors would occur from the construction or operation of the proposed project.

**Comment 15:** Checklist item I. Aesthetics – a). Potentially significant impact. In 1.6.1 of the MND, the possible off-site staging area suggested for the project to store “supplies and materials” is “South of Interstate 210 at Wheatland Avenue along the north side of the Tujunga Wash.” This is the location of the “Vista Point” shown in the San Gabriel/Verdugo Mountains Scenic Preservation Plan. The Vista Point will be completely unusable during the construction phase. No amount of mitigation can restore habitat that has remained undisturbed for over half a century. The boundary of the Big Tujunga Wash Mitigation Bank is at this location. It is imperative that an alternate location be chosen.

**Response:** Please refer to Response for Comment 7 above concerning the proposal of an alternate staging area to the I-210 Wheatland exit area.

**Comment 16:** Checklist item I. Aesthetics - b). Potential Significant Impact Unless Mitigation Incorporated. The entire length of Foothill Boulevard from Osborne Street to Conover Street is designated as a Scenic Highway Corridor by the San Gabriel/Verdugo Mountains Scenic Preservation Plan. While the pipeline may be buried underground, the effects of a major construction project on habitat close to the roadway may be affected by the construction operations.

**Response:** The recent approval of the San Gabriel/Verdugo Mountains Scenic Preservation Plan does not change the determination of Section 3.0, I. Aesthetics b) starting on page 3-1 of the IS/MND because the checklist item analyzes impacts on a state scenic highway, which has not changed. However, the section of the IS/MND has been updated to recognize the existence of this new plan. At this time, final design has not occurred and the exact location within the roadway where the proposed pipeline would be constructed is unknown. However, the pipeline will be placed under the existing roadway and construction activities would occur within the street right-of-way. The biological report (Appendix B of the IS/MND) did not determine any sensitive habitat within the proposed project footprint. Hence, no sensitive habitat would be adversely affected by the construction of the proposed project.

**Comment 17:** Checklist item I. Aesthetics - c). Potential Significant Impact Unless Mitigation Incorporated. Conover Street is a restricted entry, unimproved fire road providing access to the Angeles National Forest. It is barred by several locked gates. It

is also the route of a proposed natural surface equestrian trail by the Angeles Golf Course Condition (25) within the 200 acres required to be dedicated Habitat Preservation Area. If this section of Conover were to be resurfaced with asphalt or gravel, this would significantly alter the conditions and specifications required by conditions set to mitigate the impacts of the golf course from which this project cannot be considered separately. The 1 million gallon (MG) tank will be prominently visible on the upslope area degrading the visual character from the recreational trail and the community of Riverwood Ranch. The tank appears to be tentatively located near an area near Eby Canyon that has also been the proposed route of a recreational trail. The view from the plateau and back to the San Gabriel Mountains would be completely dominated by an above ground tank. List of requested mitigation included.

**Response:** The Conover Street/Fire Road would be used for construction and maintenance of the proposed tank. The condition of the road will be maintained in a manner suitable for vehicular access and a natural surface equestrian trail. It will not be resurfaced with asphalt or gravel. As discussed in Section 3.0 of the IS/MND on page 3-2, the 1 MG storage tank would be placed such that impacts to the visual character of the golf course and surrounding property would be minimized (i.e., the storage tank would be at least partially buried belowground, and the aboveground portion would be obscured from view by a downslope berm and landscaping, including trees and other vegetation). In addition, the area surrounding the proposed tank site would be restored through the planting of native grasses, forbs, bushes and trees, as appropriate, and any retaining walls or engineered slopes would be disguised. It is anticipated that such landscaping would reduce or avoid any adverse visual effects of the proposed storage tank.

**Comment 18:** Checklist item IV. Biological Resources - a). The MND does not address operation of the project even though the water will be used on a golf course and the Hansen Dam Flood Control Basin directly above an open aquifer of the Tujunga Wash. The golf course is immediately upstream from the Big Tujunga Wash Mitigation Bank (a designated habitat for the federally listed Santa Ana Sucker). Operation of the golf course is contingent on well monitoring throughout the life of the installation. While construction of the pipeline may have no impact, these areas are protected and subject to 404 regulation. I request an extension of the comment period and that the lead agency contact the U.S. Department of Fish and Game regarding the impacts of operation of the project.

**Response:** The proposed project is an infrastructure/conveyance project. The IS/MND does analyze the operation as well as the construction of the proposed project. The construction and operation of the proposed project is not expected to have an impact on

the Big Tujunga Wash Mitigation Bank. Construction will not occur on, or in proximity to, the preserve. The operation of the proposed project would not have a significant impact on downstream water bodies, plants or animals because: 1) the irrigation water's quality is regulated by numerous state and federal regulations; 2) there are strict monitoring requirements and procedures in place to mitigate any potential water quality concerns to surface or ground water at the ANGC; 3) the ANGC irrigation system is designed such that recycled and potable water can be blended within the system to obtain desired water quality objectives; and 4) the ANGC has been designed to minimize irrigation and to collect excess water on site for re-use in their irrigation system.

Recycled water proposed to be distributed through the project facilities would receive full tertiary treatment and disinfection as specified under Title 22. This water would meet all current state and federal water quality criteria for recycled water supplies. Water delivered to the HDRA and the ANGC would be used for irrigation of turf areas only. Beyond the use of drought resistant grass, turf management practices, including irrigation optimization that conserves water (e.g., limiting areas to be irrigated) and evaporation would limit the area where recycled water would be used.

In addition to regulatory agency guidelines, the operation of the ANGC involves numerous water quality measures that limit the area that would be in contact with the recycled water (e.g., away from native plant areas, including known populations of slender-horned spineflower). Condition 28 requires the monitoring of local surface water and groundwater quality conditions before and during the operation of the golf course. In addition, Condition 49 addresses requirements for the "Golf Course Management Plan" including control of chemicals for water quality management. Condition 138 requires the golf course to be designed to maximize infiltration and minimize runoff. And finally, Condition 139 requires the golf course to develop and implement a water quality monitoring program.

In addition, ANGC includes preserve areas of native plants, and mitigation (Measure 40) that specifically indicates that turf areas shall be graded to direct drainage away from the preserve areas. Furthermore, mitigation measure 41 approved as part of the ANGC project specifically indicates that "... as designed, there should be no movement of water from the golf course to the preserve. Precisely controlled irrigation systems will minimize runoff of irrigation waters. All drainage is away from the preserve so that even during storm events no runoff should reach the preserve from the golf course area." In addition, the ANGC has an extensive surface and groundwater monitoring program to ensure that pre-ANGC water quality is maintained. Therefore, with the conditions placed on the golf course, it is anticipated that incidental runoff (small amounts of runoff from over-spray of sprinklers or overflow during major storm events) would be very minimal

and not substantial and therefore, not considered a significant or adverse impact on the ecosystem, aquifer or the Big Tujunga Mitigation Bank.

Potential adverse impacts to the Santa Ana sucker from the irrigation use of recycled water by the ANGC are considered to be less than significant. As described above, minimal water (whether recycled, potable or blended) is expected to reach areas inhabited by the sucker.

Limited amounts of recycled water are not anticipated to have a negative impact on the sucker. In fact, in the Santa Ana River, part of which has been formally designated by the U.S. Fish and Wildlife Service (USFWS) as critical habitat for the Santa Ana sucker, the majority of the water flowing in the downstream portions of the river during dry months is from wastewater discharges, and the sucker continues to occur within this drainage.

The groundwater monitoring being performed in association with the golf course includes pre-golf course (baseline) monitoring upstream and downstream of the golf course. Monitoring of post-golf course construction will have also been performed before the proposed project, if approved, begins construction. Per Condition 28, LADWP is one of the recipients of this data. As stated in the Conditional Use Permit, ANGC is responsible for monitoring water quality for the life of the project. LADWP will work with the ANGC and Regional Water Quality Control Board, as applicable, to determine if additional sampling parameters need to be added because of the use of reclaimed water.

The comment period on the IS/MND was extended to a total of 175 days to facilitate additional project review and comment. Section 404 of the Clean Water Act, administered jointly by the U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers, establishes a program to regulate the discharge of dredged and fill material into waters of the United States. No discharges of dredged and fill materials are proposed as part of this project, and, as such, the project is not subject to Section 404 regulation.

Construction and operation of the proposed project is not anticipated to directly impact resources under the jurisdiction of (1) USFWS pursuant to the federal Endangered Species Act or (2) the California Department of Fish and Game (CDFG) pursuant to the state Fish and Game Code and/or state Endangered Species Act. Because there is no anticipated impact on a state or federally listed Threatened or Endangered species, approval to impact (take) is not required from either the CDFG and/or USFWS; however



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CDFG was notified as part of standard LADWP practice through filing of the IS/MND with the State Clearinghouse and did not provide comments on the proposed project.

**Comment 19:** Checklist item IV. Biological Resources – d). Potential Significant Impact Unless Mitigation Incorporated. There are three areas of concern directly impacted by the proposed construction: 1) Little Tujunga Bridge Crossing is an established wildlife corridor that supports the frequent migration of deer and other large mammals down to the fresh water in Hansen Dam. Opinion supported by 2002 EIR for Hansen Dam Soccer Complex [comment followed by list of requested mitigation]. 2) Proposed staging area south of Wheatland and I-210 is a breeding and feeding area for Black Tailed Jackrabbits. Further disturbance of this area could result in significant adverse effects to wildlife [comment followed by a requested mitigation measure]. 3) Conover Fire Road and tank construction area may permanently decrease use of the area as a local movement corridor and habitat area [comment followed by list of requested mitigation].

**Response:** Wildlife movement/corridor is discussed in detail in the biological technical memorandum for the proposed project (starting on page 5 of Appendix B of the IS/MND). Construction of the proposed pipeline would be short-term (lasting approximately 3 months) at any one location. Though a few areas adjacent to the proposed project could support wildlife corridors, construction would not interfere substantially with this movement. As for adding mitigation for habitat restoration to remove giant reed, *Arundo donax*, no construction is proposed within the wash and therefore, the construction of the proposed project would not spread this plant.

Please refer to Response to Comment 7 above regarding the proposed staging area at I-210 and Wheatland.

Though construction of the tank would take approximately 12 months, this is considered a short-term impact. Wildlife in the area of tank construction would use other corridors temporarily. Following construction, there would be a complete restoration of habitat disturbed by construction through planting of native grasses, forbs, bushes and trees (including native oaks), as appropriate. The operation of the tank is not expected to create a permanent barrier to wildlife movement or eliminate an important habitat area (refer to Appendix B of IS/MND).

**Comment 20:** Checklist item IV. Biological Resources – e). Potential Significant Impact Unless Mitigation Incorporated. The area from the intersection of Foothill and Osborne and the Los Angeles National Golf Club are within the boundaries of the San Gabriel/Verdugo Mountains Scenic Preservation Plan, the Condition of Uses and Mitigation for the Canyons Hills Golf Course, the Rim of the Valley Corridor Proposed

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National Park, Hansen Dam Soccer Complex and Master Mitigation Plan for the Big Tujunga Wash Mitigation Bank. Request that an extension of the comment period be granted to compare the project proposal and determine if any conflicts exist.

**Response:** The documents mentioned by the commenter have been reviewed and no conflict exists regarding any local policies or ordinances protecting biological resources; therefore, the proposed project would not result in an impact. Since your meeting with Mr. Amezcua, the review period for the document has been extended until July 21, 2004, for a total of 175 days of public review.

**Comment 21:** Checklist item IV. Biological Resources – f). There are over 370 Conditions for the Canyon Hills Golf Course, including a 200 acre Habitat Preservation Area dedication to the SMMC. The Conover Fire Road and site of the 1 MG tank are within this area. There are three areas of concern directly impacted by the proposed construction: 1) Little Tujunga Bridge Crossing is an established wildlife corridor that supports the frequent migration of deer and other large mammals down to the fresh water in Hansen Dam. Opinion supported by 2002 EIR for Hansen Dam Soccer Complex [comment followed by list of requested mitigation]. 2) Proposed staging area south of Wheatland and I-210 is a breeding and feeding area for Black Tailed Jackrabbits. Further disturbance of this area could result in significant adverse effects to wildlife [comment followed by a requested mitigation measure]. 3) Conover Fire Road and tank construction area may permanently decrease use of the area as a local movement corridor and habitat area [comment followed by list of requested mitigation].

**Response:** Please refer to Response for Comment 5 above concerning the ANGC land dedication to the SMMC and refer to Response for Comment 7 above concerning the proposal of an alternate staging area to the I-210 Wheatland exit area.

In Section 3.0, Discussion of Environmental Impacts and Mitigation Measures, IV. Biological Resources, of the IS/MND starting on page 3-16, the potential environmental impacts of the construction and operation of the proposed project on biological resources, including wildlife corridors, is adequately addressed. As stated in IV. Biological Resources, a detailed biological resources technical memorandum was prepared and included as Appendix B of the IS/MND. Appendix B provides details of the survey methods, survey results with a focus on vegetation types, wildlife populations and movement patterns (wildlife corridors), special status vegetation types, plant and wildlife species either known or potentially occurring within the area potentially affected by the proposed project, and an analysis of impacts associated with the construction and operation of the project. No significant impacts to sensitive species are anticipated to occur.

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Wildlife movement/corridor is discussed in detail in the biological technical memorandum for the proposed project (starting on page 5 of Appendix B of the IS/MND). Construction of the proposed pipeline would be short-term (lasting approximately 3 months) at any one location, including at the Little Tujunga Bridge crossing. Though a few areas adjacent to the proposed project could support wildlife corridors, construction would not interfere substantially with this movement. Though construction of the tank would take approximately 12 months to construct, this is considered a short-term impact. Wildlife in the area of tank construction would use other corridors temporarily. The operation of the tank is not expected to create a permanent barrier to wildlife movement or eliminate an important habitat area.

In areas of construction and operation where potential habitat exists, such as the proposed tank site, the project footprint would be placed to avoid the areas with potential to support these species and no significant impacts to sensitive species are anticipated to occur. As seen in the Final MND's correction and additions, LADWP will utilize biological monitors to determine the extent of native habitat adjacent to the proposed tank site and flag the boundaries of these areas to be avoided during construction.

**Comment 22:** Checklist item IX. Land Use and Planning – b) and c). The proposed project is partially located (from the intersection of Osborne and Foothill Boulevard) within an area that is described by the Environmental Element of the City of Los Angeles as a rural/agricultural area worthy of preservation. This is also reflected in the Sunland-Tujunga Shadow Hills Lake View Terrace Community Plan which describes the area as predominately zoned RA, RE and A. The area also contains a special use "K" district overlay. There are over 370 conditions for the Canyon Hills Golf Course; area of San Gabriel/Verdugo Mountains Scenic Preservation Plan; area of the Rim of the Valley Corridor Proposed National Park. Request that an extension of the comment period be granted to compare the project proposal and determine if any conflicts exist.

**Response:** The documents mentioned by the commenter have been reviewed. No "Environmental Element" was found. However, the City of Los Angeles does have a Conservation Plan that addresses conservation, protection, development, utilization and reclamation of natural resources. No reference was found to the project area being designated as a rural/agricultural area worthy of preservation. The Sunland-Tujunga-Shadow Hills-Lake View Terrace Community Plan does describe Foothill Boulevard (were the majority of pipeline would be placed) as a "shallow corridor of commercial land with concentrations of multiple family residential intermixed with commercial." Since your meeting with Mr. Amezcua, the review period for the document has been extended until July 21, 2004, for a total of 175 days of public review.

**Comment 23:** Checklist item XIII. Public Services – a). During the three year construction period, Glenoaks and Foothill Boulevards will be impacted. The ability to access intersecting streets, communities, and public facilities may be limited to a single route via one of these two streets. Intersections and government facilities that have no other access and will possibly be isolated during construction that should be noted [original letter contains a list of facilities provided for consideration]. I request that special care be given along the route to never block these critical access points for extended periods of time. I request that the affected residents be notified by phone or fax at least 48 hours prior to construction and dates/times of construction and duration in hours when access will be interrupted. I request mitigation for the extreme inconvenience which will be in both the severity of blocked access and the duration of time (three years). I request a natural surface recreation trail (including landscaped buffer between the street and trail) be constructed along the south side of Osborne from the intersection of Osborne and Glenoaks to the Hansen Dam overlook in Council District 7 and along the north side of Foothill from the intersection of Osborne Street to Wheatland Avenue in Council District 2.

**Response:** Please refer to the Response to Comment 12 regarding traffic control plans and construction methods.

Standard LADWP practice is to provide public notification for a project such as this. Notification usually includes street signs announcing the proposed construction period, as well as door hangers placed on properties along the affected alignment. Regarding hours of operation, as stated in the IS/MND, construction activities would generally be carried out between 7 a.m. and 6 p.m., Mondays to Fridays, and 8 a.m. and 5 p.m. on Saturdays, in accordance with the City of Los Angeles Noise Ordinance.

Regarding your request for a natural surface recreation trail, your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

**Comment 24:** Checklist item XV. Transportation/Traffic. The proposed project is partially located within an area that is described by the Environmental Element of the General Plan (adopted 2001) as a rural/agricultural area worthy of preservation. This is also reflected in the Sunland-Tujunga Shadow Hills Lake View Terrace Community Plan which describes the area as predominately zoned RA. There will be substantial impacts to transportation routes whose ingress and egress is via Foothill Boulevard. These intersections are noted above in the Public Services comment. Foothill is not only a Major Class II Highway, it is the ONLY way to reach certain residences located along the route. Work along Foothill Boulevard will affect residents during the entire period of construction. I request that special care be given along the route to never block these critical access points for extended periods of time. I request mitigation for the extreme

inconvenience which will be in both the severity of blocked access and the duration of time (three years). I request a natural surface recreation trail (including landscaped buffer between the street and trail) be constructed along the south side of Osborne from the intersection of Osborne and Glenoaks to the Hansen Dam overlook in Council District 7 and along the north side of Foothill from the intersection of Osborne Street to Wheatland Avenue in Council District 2.

**Response:** Please refer to the Response to Comment 23 above.

**Comment 25:** Checklist item XVI. Utilities and Service Systems – c). Potential Significant Impact Unless Mitigation Incorporated. This is a rural neighborhood with sufficient open space within the Tujunga Watershed to absorb storm water during all but the most significant storm events. There are no stormwater drainage facilities provided along much of the proposed alignment and surrounding vicinity. This includes an absence of curbs and gutters. The capacity of the stormwater drainage facilities is therefore limited to surface facilities and prone to entering private residences and driveways. Any dewatering during construction will impact as street runoff along the route before finally draining into the Tujunga Wash. I request that dewatering be monitored to avoid water running for prolonged distances or into private residences along the proposed routes.

**Response:** As stated in various sections of the IS/MND, if dewatering is necessary, it will be carried out in accordance with all applicable requirements; therefore, dewatering would not be performed in a manner that would cause a significant impact.

**Comment 26:** Checklist item XVII. Mandatory Findings of Significance – a). Potential Significant Impact Unless Mitigated. As noted in other sections, the impact areas are limited to 1) Little Tujunga Creek Crossing, 2) Proposed staging area at Wheatland south of I-210, and 3) Conover Fire Road and the one-acre tank site. While these locations represent a fraction of the proposed route, they represent disruption of the only 3 passages from the San Gabriel Mountains of the Angeles National Forest to Hansen Dam, a permanent water source for large mammals. A one-year disruption of the Black Tailed Jack Rabbit at site 2 could possibly disrupt breeding and permanently affect population of that species. Site 3 will be under construction for over a year and is the location of a Habitat Preservation Area set aside for the benefit of numerous species and required to be dedicated to the SMMC. All three sites provide a functional wildlife corridor that would be fragmented during construction. Mitigation should be required [followed by a list of requested mitigation].

**Response:** Please refer to the Response to Comment 21 above.

Ms. Mary Benson  
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October 18, 2005

**Comment 27:** Checklist item XVII. Mandatory Findings of Significance – b). Potential Significant Impact Unless Mitigation Incorporation. There is a substantial number of projects along the proposed route not undertaken by the LADWP as Lead Agency. The construction timetables of these projects run concurrently with the timetable for this project. Generated truck traffic and vehicle traffic associated with construction worker travel, as well as lane closures could elevate the impacts of concurrent construction unless coordinated. Projects with already approved EIR's listed on the State of California Website that are expected to be funded, bid and started within the time frame of this project include: Hansen Dam Soccer Complex, Sun Valley Watershed Management Plan, Hansen Dam Master Plan and EIS, Los Angeles Children's Museum, Canyon Hills Golf course Clubhouse construction, and possible reactivation of the Water Conservation and Supply Feasibility Study – Hansen Dam Draft EIR/EIS.

**Response:** Section XVII of the IS/MND addresses potential cumulative affects associated with the combination of the proposed Project and other projects occurring in the local area. As described therein, two non-LADWP projects, an international church complex located south of Foothill Boulevard and north of I-210 and the Maclay New Primary Center located near the intersection of Glenoaks Boulevard and Osborne Street, have been identified in close proximity to the proposed alignment. Based on the nature and timing of those projects, no significant cumulative impacts are expected to occur. The subject section also discusses the potential for cumulative impacts to occur from other possible projects. The proposed project, being primarily a linear infrastructure improvement project with impacts that will be temporary and transitory in nature, is not expected to cause impacts that are cumulatively considerable. It should also be noted that certain policies and procedures such as coordinating construction haul route plans through LADOT would help to coordinate the construction traffic activities of multiple projects, should they occur in proximity to each other, which would serve to mitigate potentially significant cumulative impacts.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Ms. Mary Benson  
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October 18, 2005

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez





April 13, 2004

Charles Holloway  
111 North Hope Street  
Room 1044  
Los Angeles CA 90012  
Subject: Hansen Area Water Recycling Project

Dear Mr. Holloway,

Numerous inaccuracies in the project's Mitigated Negative Declaration suggest an inadequate study of the pipe route's geography and logistics.

However, even very serious safety, environmental and logistical issues associated with construction of the pipeline itself are of comparatively minor importance, compared to the much more serious issue of the pipeline's operation.

A previous study, associated with the golf course's original EIR, cautioned that even potable "tap" water may damage the downstream environment, the Big Tujunga Wash Mitigation Bank. The high salt & boron content in recycled wastewater may not kill turf, but it is extremely damaging for native plants, trees and bushes. An endangered plant, the San Fernando Spineflower grows in the area where the recycled water will be used. Environmental Water Quality Monitoring prepared for the Chambers Group, Inc has shown the current water flowing into the mitigation ponds meets the EPA's recommended water quality criteria for freshwaters. Baseline testing for the environmental managers of the aquifer indicates that it is only 25 feet below the surface. The effect that even trace amounts of residual salts will have on endangered species that live adjacent to the proposed irrigated areas will, undoubtedly have an environmental effect on federally listed endangered species in the entire Tujunga Wash ecosystem downstream of the golf course.

Therefore, I urgently request that a FULL "Environmental Impact Report" (EIR) be done for the Hansen Area (waste) Water Recycling Project.

It is unnecessary to risk pushing the Hansen Area Recycled wastewater project east to the Golf course. At the April 6th meeting, the Lopez Landfill Greenwaste Recycling Project was confirmed by DWP to be a future site. The reason given for not extending the project 2/3 of a mile north from the intersection of Osborne and Foothill, towards an industrial area, instead of 2 miles east into an endangered species preserve, was that the elevation at Lopez Landfill was too great an elevation to be feasible. Another excuse was that, based on past usage, there would not be enough water used.

According to the project map, the under construction Lopez Greenwaste Recycling project is a more appropriate "first customer" for this water - the former landfill site is NOT within the 100 year floodplain, lined to prevent water leakage, and provides an ideal laboratory environment in which to monitor and test the long-term results of irrigating with recycled water. Furthermore, the base of the Landfill is 1400msl. This is EXACTLY same elevation as the proposed 1MG tank to be constructed for the Golf Course. The infrastructure to get the water up to the landfill is already in place (pumping station, pipe, 1 MG tank). Past water usage is not indicative of the project, since it is still under construction, and is not yet fully operational.

There is so much at stake in terms of both human health and environmental health -- a full E.I.R. is not unreasonable to demand.

Sincerely,  
Mary K. Benson  
11070 Sheldon Street  
Sun Valley CA 91352

Cc:

Tujunga Watershed Council  
PO Box 176  
Sunland CA 91041

Los Angeles County Department of Public Works  
Mr. Jason Pereira  
Water Resources Division, Dams Section  
900 South Fremont Avenue  
Alhambra, California 91803-1331

California Department of Fish and Game  
Ms. Mary Meyer  
1429 Foothill Road  
Ojai, California 93023

California Department of Fish & Game  
Mr. Scott Harris  
P.O. Box 950310  
Mission Hills, CA 91395

Regional Water Quality Control Board, Los Angeles Region (4)  
Mr. Raymond Jay  
320 West 4<sup>th</sup> Street Ste 200  
Los Angeles CA 90013

U.S. Fish & Wildlife Service  
Mr. Kevin Clark  
2730 Loker Avenue West  
Carlsbad, CA 92008

U. S. Army Corps of Engineers  
Mr. Aaron Allen  
P.O. Box 532711  
Los Angeles, CA 90053-2325



ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Mary Benson  
11070 Sheldon Street  
Sun Valley, CA 91352

Dear Ms. Benson:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your additional comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** Numerous inaccuracies in the project's Mitigated Negative Declaration suggest an inadequate study of the pipe route's geography and logistics.

**Response:** No examples of "numerous geographical and logistical inaccuracies within the IS/MND" were given in the commenter's letter that could be either responded to or addressed. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

**Comment 2:** However, even very serious safety, environmental and logistical issues associated with construction of the pipeline itself are of comparatively minor importance, compared to the much more serious issues of the pipeline's operation. A previous study, associated with the golf course's original EIR, cautioned that even potable "tap" water may damage the downstream environment, the Big Tujunga Wash Mitigation Bank. The high salt and boron content in recycled wastewater may not kill turf, but it's extremely damaging for native plants, trees and bushes. An endangered plant, the San Fernando Spineflower grows in the area where the recycled water will be used. Environmental Water Quality Monitoring prepared for the Chambers Group, Inc. has shown the current water flowing into the mitigation ponds meets the EPA's recommended water quality criteria for freshwaters. Baseline testing for the environmental managers of the aquifer indicates that it is only 25 feet below the surface. The effect that even trace amounts of residual salts will have on endangered species that live adjacent to the proposed irrigated areas will, undoubtedly have an environmental effect on federally listed endangered species in the entire Tujunga Wash

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ecosystem downstream of the golf course. I urgently request that a FULL "Environmental Impact Report" be done for the Hansen Area (waste) Water Recycling Project.

**Response:** The construction and operation of the proposed project is not expected to have an impact on the Big Tujunga Wash Mitigation Bank. Construction will not occur on, or in proximity to, the preserve. The operation of the proposed project would not have a significant impact on downstream water bodies, plants or animals because: 1) the irrigation water's quality is regulated by numerous state and federal regulations; 2) there are strict monitoring requirements and procedures in place to mitigate any potential water quality concerns to surface or ground water at the Angeles National Golf Club (ANGC); 3) the ANGC irrigation system is designed such that recycled and potable water can be blended within the system to obtain desired water quality objectives; and 4) the ANGC has been designed to minimize irrigation and to collect excess water on site for re-use in their irrigation system.

Recycled water proposed to be distributed through the project facilities would receive full tertiary treatment as specified under Title 22 and disinfection. This water would meet all current state and federal water quality criteria for recycled water supplies. Water delivered to the Hansen Dam Recreation Area (HDRA) and the ANGC would be used for irrigation of turf areas only. Beyond the use of drought-resistant grass, turf management practices, including irrigation optimization that conserves water (e.g., limiting areas to be irrigated) and evaporation would limit the area where recycled water would be used.

In addition to regulatory agency guidelines, the operation of the ANGC involves numerous water quality measures that limit the area that would be in contact with the recycled water (e.g., away from native plant areas, including known populations of slender-horned spinyflower). Condition 28 requires the monitoring of local surface water and groundwater quality conditions before and during the operation of the golf course. In addition, Condition 49 addresses requirements for the "Golf Course Management Plan" including control of chemicals for water quality management. Condition 138 requires the golf course to be designed to maximize infiltration and minimize runoff. And finally, Condition 139 requires the golf course to develop and implement a water quality monitoring program.

In addition, ANGC includes preserve areas of native plants, and mitigation (Measure 40) that specifically indicates that turf areas shall be graded to direct drainage away from the preserve areas. Furthermore, Mitigation Measure 41 approved as part of the ANGC project specifically indicates that "... as designed, there should be no movement of water from the golf course to the preserve. Precisely controlled irrigation systems will

minimize runoff of irrigation waters. All drainage is away from the preserve so that even during storm events no runoff should reach the preserve from the golf course area." In addition, the ANGC has an extensive surface and groundwater monitoring program to ensure that pre-ANGC water quality is maintained. Additionally, the final MND includes an addition to the project description indicating that the Los Angeles Department of Water and Power (LADWP) will work with the Regional Water Quality Control Board and ANGC to determine if additional sampling parameters need to be added to the ANGC's water quality monitoring program as a result of the use of recycled water.

Therefore, with the operational parameters and the conditions placed on the golf course, it is anticipated that incidental runoff (small amounts of runoff from over-spray of sprinklers or overflow during major storm events) would be very minimal and not substantial and therefore, neither the recycled water nor residual salts are considered to pose a threat of significant or adverse impacts on sensitive species, the ecosystem, or the Big Tujunga Mitigation Bank.

Potential impacts on sensitive biological resources are further described in Appendix B of the IS/MND (Biological Resources Technical Memorandum).

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

**Comment 3:** It is unnecessary to risk pushing the Hansen Area Recycled wastewater project east to the golf course. At the April 6<sup>th</sup> meeting, the Lopez Landfill Greenwaste Recycling Project was confirmed by DWP to be a future site. The reason given for not extending the project 2/3 of a mile north from the intersection of Osborne and Foothill, towards an industrial area, instead of 2 miles east into an endangered species preserve, was that the elevation of Lopez Landfill was too great an elevation to be feasible. Another excuse was that, based on past usage, there would not be enough water used. According to the project map, the under construction Lopez Greenwaste Recycling project is a more appropriate "first customer" for this water – the former landfill site is NOT within the 100 year floodplain, lined to prevent water leakage, and provides an ideal laboratory environment in which to monitor and test the long-term results of irrigating with recycled water. Furthermore, the base of the Landfill is 1400 msl. This is EXACTLY the same elevation as the proposed 1MG tank to be constructed for the Golf Course. The infrastructure to get the water up to the landfill is already in place (pumping station, pipe, 1MG tank). Past water usage is not indicative of the project, since it is still under construction, and is not yet fully operational. There is so much at stake in terms of both human health and environmental health – a full EIR is not unreasonable to demand.

**Response:** Lopez Canyon Landfill (LCL) is not being proposed as a customer as part of this project. Supplying recycled water to LCL would require the development of a system with sufficient hydraulic capacity to serve the water demand at adequate pressure. HDRA and ANGC are physically situated at elevations and locations that can be immediately served by utilizing the proposed pumping station at the Valley Generating Station (VGS) to lift the water to the proposed storage tank at a hydraulic grade of approximately 1,405 feet. Trying to use a single pump station at VGS to pump to the top of LCL would result in pressures too great for service at lower elevations such as at HDRA.

The existing pump station at LCL could be used to pump the water to Lopez Canyon Landfill if the LCL pipe system were re-designed so that irrigation water and industrial water would be completely separated from potable water uses; however, operating the LCL pump station without the proposed storage tank at ANGC would result in a system of two pump stations located in series without a storage tank. This type of system has the potential to cause cavitation of the pumps or pressure surges throughout the recycled water distribution scheme. To serve the LCL, the water would need to be pumped from the proposed storage tank to the existing LCL tank located on top of the landfill.

If a future project were to propose to extend a recycled water pipeline to LCL, the proposed project's pump station and storage tank would provide a system that (1) could operate at pressures which could continue to serve customers at lower elevations and (2) would have the storage capacity to help provide adequate suction pressure for the existing LCL Pump Station to operate without causing cavitation of the pumps or pressure surges. Any proposed future project would undergo an environmental evaluation as required under the California Environmental Quality Act (CEQA).

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Ms. Mary Benson  
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October 18, 2005

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez





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

3 March 2004

Fax 213-367-3582

Re: Hansen Area Water Recycling Project

Dear Sir,

I was unaware of this project until yesterday, amazingly. I say it is amazing because I am very active in the community: Neighborhood Council Activist, Block Captain for same, Design Advisory Committee (where we are alerted to such projects) for same, Neighborhood Watch Captain, Community Emergency Response Team (LA Fire Department) member for Sunland/Tujunga, President of Wentworth Woods Homeowners Association and a local Realtor.

As I am the President of the HOA for our 40 home community I can say in all honesty that this idea is not welcomed by this community. Many of these homes, ours included, overlook the target area for the proposed 1 million gallon water storage tank. Many of my clients own homes that have this area as their view. They will also be opposed to this.

My husband, Tony, and I are caretakers for this area of the wash. No one asked us to, we just do. It is he and I that go into the wash, frequently, burying dog feces from the countless dogs that are walked in there every day, all day. This point is made to illustrate how many people enjoy this area of the wash, now. It is our efforts that resulted in a Community Clean up (where roughly 75 community members went out there and cleaned it up - resulting in filling up one full compressing garbage collection truck) of this area two years ago and made it what it is now. It was our efforts that got the wash area entry positions closed off so that no one can drive on the wash to do illicit activities, abandon stolen vehicles, dump trash, etc. It is our continued work with our City Council office that keeps it free from bombardment by homeless, transient encampment. It is now a wild life preserve, its intended use, visited daily by roughly 30 visitors. Many of whom sit at the end of our street, on the bench we installed, enjoying THE VIEW. Prior to our efforts it was an area full of trash, not liked by the community, used for dumping, crime was rampant and cars from partying teenagers at night were commonplace. That is what it used to be. What it is now is a park/preserve loved by the community.

My point? That you are proposing to return this area to the state it was in before. A homeless camp (water tanks are a great hiding place), an eye sore and an area no one cares about, a view that turns our wildlife preserve into an industrial looking, useless piece of land.

While I applaud your efforts to look for ways to recapture wasted water - an environmentally sound idea - I think you MUST look for solutions that do NOT ruin the environment in the process.

As representative of many who live here and enjoy this area I am strongly urging you to rethink this project and install this monstrosity somewhere else.  
As homeowners here we will take it upon ourselves to alert the hundreds of other homeowners to this proposal and see to it you are given the letters you require to STOP this installation.

Sincerely,

  
Tomi Lyn Bowling

cc: Wendy Greuel  
Mary Lee Tiernan - The Foothill Sentinel  
Dale Thrush  
Daily News Editor

---

Tomi Lyn Bowling  
Realtor ®  
8545 Tujunga Valley St  
Sunland CA 91040  
(818-353-9143)





ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Tomi Lyn Bowling  
8545 Tujunga Valley Street  
Sunland, CA 91040

Dear Ms. Bowling:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to attached letter for actual comment text):

**Comment 1:** I was unaware of this project until yesterday, amazingly. I say it is amazing because I am very active in the community.

**Response:** The Los Angeles Department of Water and Power (LADWP) followed the California Environmental Quality Act (CEQA) noticing requirements, per the CEQA Guidelines, as they pertained to distribution of an IS/MND. Under CEQA Guidelines Section 15072(a), a lead agency (e.g., LADWP) must "provide notice of intent to adopt a negative declaration or mitigated negative declaration to the public, responsible agencies, trustee agencies, and the county clerk of each county within which the proposed project is located, sufficiently prior to adoption by the lead agency ...". As further stated in CEQA Guidelines Section 15072(b), the lead agency shall mail a notice of all organizations and individuals who have previously requested such a notice in writing and shall also give notice by at least one of the following methods: 1) publication in a newspaper of general circulation in the area affected; 2) posting of notice on and off site in the area; or, 3) direct mailing to owners and occupants of contiguous property. As is LADWP's standard practice, a notice of intent for the proposed project was posted with both Los Angeles County and City Clerks on January 29, 2004. LADWP also published the notice in the *Los Angeles Times* on Thursday, January 29, 2004.. In addition to sending notices to responsible agencies, LADWP sent 1252 notices to occupants along the proposed project alignment.

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Ms. Tomi Lyn Bowling  
Page 2  
October 18, 2005

Additionally, the public comment period for the IS/MND was extended on four occasions, for a total duration of almost six months ending on July 21, 2004, to facilitate public outreach, review and comment on the proposed project.

**Comment 2:** As President of HOA for our 40 home community I can say in all honesty that this idea is not welcomed by this community. Many of these homes, our included, overlook the target area fro the proposed 1 million gallon water storage tank. Many of my clients own homes that have this area as their view. They will also be opposed to this.

My husband and I are caretakers for this area of the wash. Many people enjoy this area of the wash. It was our effort that resulted in a Community Clean up of this area two years ago and made it what it is now. It was our efforts that got wash entry positions closed off so that no one can drive on the wash to do illicit activities, abandon vehicles, etc. It is our combined work with our Council District office that keeps it free from bombardment by homeless. It is now a wildlife preserve, its intended use, visited daily by roughly 30 visitors. Many of whom sit at the end of our street, on the bench we installed, enjoying THE VIEW. Prior to our efforts it was an area full of trash. Now it is a park/preserve loved by the community.

**Response:** LADWP is committed to maintaining the current character of the proposed tank location through partial or complete burial of the proposed tank and complete site restoration at the completion of construction. The Conover Fire Road, which would continued to have a locked entry point, would be maintained with a surface suitable for both local vehicular access and a natural surface equestrian trail.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

**Comment 3:** My point? That you are proposing to return this area to a state it was in before. A homeless camp (water tanks are a great hiding place), an eye sore and an area no one cares about, a view that turns our wildlife preserve into an industrial looking, useless piece of land.

**Response:** Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

**Comment 4:** While I applaud your efforts to look for ways to recapture wasted water an environmentally sound idea – I think you MUST look for solutions that do NOT ruin the environment in the process.

Ms. Tomi Lyn Bowling  
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**Response:** As analyzed in the IS/MND, the proposed project would not adversely affect the environment. The IS/MND identifies and analyzes the impacts to various environmental sources and finds that many project components would fall below significance thresholds for construction and operation activities and cumulative impacts. In the case that impacts were considered potentially significant (e.g., cultural resources, noise) mitigation measures were identified in the IS/MND that would reduce the potential impacts to less than significant levels. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

**Comment 5:** As representative of many who live here and enjoy this area I am strongly urging you to rethink this project and install this monstrosity somewhere else. As homeowners here we will take it upon ourselves to alert the hundreds of other homeowners to proposal and see to it you are given the letters you require to STOP this installation.

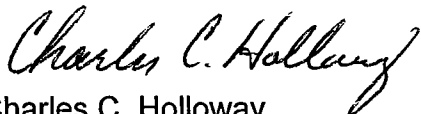
**Response:** Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or are require additional information, please contact Ms. Sarah Easley Perezat (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
c: Ms. Sarah Easley Perez



Charles Holloway  
111 North Hope Street  
Room 1044  
Los Angeles CA 90012

Subject: Hansen Area Water Recycling Project

Dear Mr. Holloway,

12 April 2004

I have some concerns about the construction of the pipes for the water recycling project in the Lake View Terrace area. (I live in Lake View Terrace and am only 800 feet from the where the pipes will be placed.) The digging and pipe laying will impact the local equine traffic and will be dangerous and impede access at several critical trail points on Foothill Blvd. Metal plates will spook the majority of horses and they WILL NOT WALK OVER them. Orcas Ave, Christy Ave, Wheatland are all major cross points for the horse traffic within Lake View Terrace, Hansen Dam and Shadow Hills. The construction and placement of the water tank will impede another trail into the mountains. The trucks and pipe delivery will be a serious disruption for local horse riders as well.

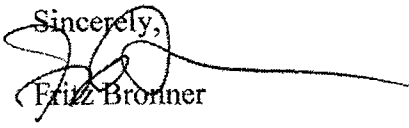
Also the placement of where pipes will be stored will be another safety issue for the local horse community.

I also have some concerns about what is going into the pipes as well, regarding the local, fragile environment. There are many wildlife and native plants that may not survive with the heavy dose of salt in the recycled water.

I also have deep concerns about the medications and chemicals ~~that~~ in the recycled water, <sup>B</sup> entering the local ground water. This medical stew could also cause further harm to the environment.

I request that a full "Environmental Impact Report" (EIR) be done for the Hansen Area (waste) Water Recycling Project. This would give us all better information on the potential harms and risks.

Sincerely,

  
Fritz Bronner

11416 Orcas Ave

Lake View Terrace, CA 91342







ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Mr. Fritz Bronner  
11416 Orcas Avenue  
Lake View Terrace, CA 91342

Dear Ms. Bronner:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** I have some concerns about the construction of the pipes for the water recycling project in the Lake View Terrace area. (I live in Lake View Terrace and am only 800 feet from where the pipes will be placed) The digging and pipe laying will impact the local equine traffic and will be dangerous and impede access at several critical trail points on Foothill Blvd. Metal plates will spook the majority of horses and they WILL NOT WALK OVER them. Orcas Ave, Christy Ave, Wheatland are all major cross points for the horse traffic within the Lake View Terrace, Hansen Dam and Shadow Hills. The construction and placement of the water tank will impede another trail into the mountains. The trucks and pipe delivery will be a serious disruption for local horse riders as well. Also the placement of where pipes will be stored will be another safety issue for the local horse community.

**Response:** As described in the IS/MND, construction is expected to progress along the proposed alignment with the maximum length of open trench at one time being open of approximately 500 feet in length within a work area of up to approximately 2,000 linear feet. This type of construction would progress such that no one area would be directly affected by the construction for no more than a three-month period. Portions of the proposed alignment could disrupt equestrian activity during the short period of time that construction would take place in any one location. For the safety of people and horses, construction areas would be designated and ingress/egress limited per all applicable standard practices and LADOT requirements, thus limiting the access of horses in the construction area during the temporary construction period at any one location.

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Mr. Fritz Bronner  
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Although construction would temporarily limit access to trails along Conover Fire Road, the Los Angeles Department of Water and Power (LADWP) is committed to maintaining the current character of the proposed tank location through partial or complete burial of the proposed tank and site restoration at the completion of construction. At the completion of construction, Conover Fire Road would be maintained for current levels of access with a surface suitable for both vehicular access and a natural surface equestrian trail.

The staging areas proposed for the project include: Valley Generating Station and a lot adjacent to the Hansen Dam Sports Complex (near Foothill and I-210; near noise reading location NR-3 of Figure 2 of the IS/MND on page 1-3). LADWP will not utilize the I-210 Wheatland exit as a staging area. If the lot adjacent to the Hansen Dam Sports complex is unavailable, then LADWP proposes to use another site in close proximity to the proposed project alignment but not the I-210/Wheatland site. Access to staging areas would be limited and would not present a hazard to people or horses.

**Comment 2:** I also have some concerns about what is going into the pipes as well, regarding the local fragile environment. There are many wildlife and native plants that may not survive with the heavy dose of salt in the recycled water. I also have deep concerns about the medications and chemicals in the recycled water entering the local groundwater. This medical stew could also cause further harm to the environment.

**Response:** The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of recycled water by providing recycled water for landscape irrigation. The State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of the recycled water facilities. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. Additionally the Los Angeles Regional Water Quality Control Board implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are protected. Recycled water proposed for distribution in this project would be required meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project.

Mr. Fritz Bronner  
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This water would receive full tertiary treatment, including filtration and disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable water quality standards. In fact, although the salt concentration of recycled water from the Tillman Plant is higher than that which would be provided via the LADWP potable water system, the Tillman recycled water presently meets the current drinking water standards for salt.

In addition, as part of the City's detailed monitoring of its water quality, in 2001, LADWP tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including the Tillman Water Reclamation Plant. No drug residues were detected in any of the samples.

The Angeles National Golf Club (ANGC), one of the proposed customers for this project, is a state of the art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their Conditional Use Permit (CUP). Per their CUP, once irrigation water has been delivered to the site, Condition 28 for operation of the golf course is triggered. Condition 28 requires monitoring of local surface water and groundwater quality before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires monitoring and mitigation of water quality and quantity concerns for Tujunga Ponds. Condition 127 states that the irrigation input of water shall be at a replacement rate only. Condition 138 says the golf course shall be designed to maximize infiltration and minimize runoff. Condition 139 requires the golf course to develop and implement a water quality monitoring program. Condition 194 requires that the golf course irrigation system be designed to minimize the number of acres receiving irrigation and be designed so non-essential turf areas would not be watered during droughts. Condition 196 requires that the irrigation system include computerized controls to avoid unnecessary watering and minimize water loss through evaporation. Condition 197 requires a landscape plan for the course that emphasizes low water consumption grasses wherever possible. And finally, Condition 198 requires that the golf course, in order to reduce the demand on the water infrastructure, investigate with the LADWP the possible use of an on-site well and the possibility of connecting to the East Valley Reclamation Project pipeline for the use of recycled water.

Irrigation water use is effectively minimized at ANGC through design features, as required by the above Conditions. Modern irrigation controllers coupled with weather monitoring devices allow the golf club to precisely determine and deliver the appropriate amount of water for the drought tolerant hybrid Bermuda grass used as the primary turf

on the club's tees, fairways and roughs. This system allows computers to send a signal to satellites in the field that change irrigation run times based on current heat, wind, solar radiation and humidity. Daily monitoring of the irrigation system for distribution uniformity aids in maximizing system efficiency and minimizing excess irrigation.

Under normal operating conditions, all water being used for irrigation will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a sub-grade drainage system beneath putting greens, tees, and various areas in roughs and fairways is designed to collect and convey on site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all appropriate irrigation water quality parameters are met.

In addition, ANGC includes preserve areas of native plants, and mitigation (Measure 40) that specifically indicates that turf areas shall be graded to direct drainage away from the preserve areas. Furthermore, Mitigation Measure 41 approved as part of the ANGC project specifically indicates that "... as designed, there should be no movement of water from the golf course to the preserve. Precisely controlled irrigation systems will minimize runoff of irrigation waters. All drainage is away from the preserve so that even during storm events no runoff should reach the preserve from the golf course area." In addition, the ANGC has an extensive surface and groundwater monitoring program to ensure that pre-ANGC water quality is maintained. Therefore, with the conditions placed on the golf course, it is anticipated that incidental runoff (small amounts of runoff from over-spray of sprinklers or overflow during major storm events) would be very minimal and not substantial and therefore, not considered a significant or adverse impact on local wildlife or habitat.

The City of Los Angeles Department of Recreation and Parks' Hansen Dam Recreation Area (HDRA), the other proposed customer for this project, uses Best Management Practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File 166080), as required by the California State Assembly Bill AB325, to ensure local water quality and reduce potential runoff.

The operation of the proposed project would not have a significant impact on local wildlife or habitat because: 1) the irrigation water's quality is regulated by numerous state and federal regulations; 2) there are strict monitoring requirements and procedures in place to mitigate any potential water quality concerns to surface or ground water at the ANGC; 3) the ANGC irrigation system is designed such that recycled and potable water can be blended within the system to obtain desired water

Mr. Fritz Bronner  
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quality objectives; 4) the ANGC has been designed to minimize irrigation and to collect excess water on site for re-use in their irrigation system; and 5) HDRA uses BMPs to ensure local water quality and reduce potential runoff.

Potential impacts on sensitive biological resources are further described in Appendix B of the IS/MND (Biological Resources Technical Memorandum).

**Comment 4:** I request that a full EIR be done for the Hansen Area (waste) Water Recycling Project. This would give us all better information on the potential harms and risks.

**Response:** The California Environmental Quality Act (CEQA) has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an Initial Study (IS). This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies a Mitigated Negative Declaration (MND). If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an Environmental Impact Report (EIR).

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, a MND was prepared and publicly distributed for review and comment.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

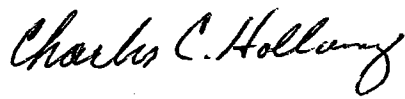
Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Mr. Fritz Bronner  
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October 18, 2005

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or are require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez

Los Angeles Department of Water and Power  
Environmental Affairs  
Attn: Charles Holloway, Supervisor of Environmental Assessment  
City of Los Angeles  
11 North Hope Street, Room 1044  
Los Angeles, CA 90012

SCH Not on file  
Initial Study - Proposed Mitigated Negative Declaration  
HANSEN AREA WATER RECYCLING PROJECT WP-038-04  
January 2004

Comment Letter

Dear Mr. Holloway:

Neither I nor any of my neighbors in my development known as the Riverwood Ranch and located east and north of the Angeles National Golf Course were notified of this matter by mail. Since the proposed one-million-gallon recycled water tank is to be located in the middle of Conover road which means, therefore, that it is to be located in the middle of our only emergency exit. At times of flooding, our normal route often becomes impassable and our only way out is Conover road.

When members of our homeowners group met with the representatives of this project, they told us they did not realize that there were any homes where we live. How is it possible that this Mitigated Declaration has been allowed when such a simple fact is unknown to the project managers?

They also admitted that they were unaware of the numerous conditions placed upon the Golf Course by the City or of the City Ordinances which affect this area including the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan. They had ignored or were unaware of the sensitive ecological areas west of the Golf Course. Or, did they, at a subsequent public meeting, have satisfactory and complete answers to the alarming questions regarding the safety of the aquifer, and they appear to have ignored the tremendous inconvenience, cost and possible options.

There are so many issues which have not been considered properly for this project that I wish to refer you to two letters which have been sent to you. Both of these thoroughly researched letters spell out those many and various problems which have not been dealt with in this mitigated declaration. They were written to you by Mary Benson on February 25, 2004 and Bill Eick on February 5, 2004.

This project cannot go forward without an EIR and until the numerous issues put forth have been resolved. Recycled water is a great idea theoretically, but realistically it appears to need a lot more research and forethought.

Please keep me informed. Thank you.

Elaine Brown  
1445 Skyland Rd  
Lanham, CA 91040

Los Angeles Department of Water and Power  
Environmental Affairs  
Attn: Charles Holloway, Supervisor of Environmental Assessment  
City of Los Angeles  
11 North Hope Street, Room 1044  
Los Angeles, CA 90012

SCH Not on file  
Initial Study - Proposed Mitigated Negative Declaration  
HANSEN AREA WATER RECYCLING PROJECT WP-038-04  
January 2004

Comment Letter

Dear Mr. Holloway:







ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Elaine Brown  
11445 Skyland Road  
Sunland, CA 91040

Dear Ms. Brown:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** Neither I nor any of my neighbors in my development known as the Riverwood Ranch and located east and north of the Angeles National Golf Club were notified of this matter by mail. Since the proposed one-million gallon recycled water tank is to be located in the middle of Conover Road which means, therefore, that it is to be located in the middle of our only emergency exit. At times of flooding, our normal route often becomes impossible and our only way out is Conover Road. When members of our homeowners group met with the representatives of this project, they told us they did not realize that there were any homes where we live. How is it possible that this Mitigated Negative Declaration has been allowed when such a simple fact is unknown to the project managers?

**Response:** The Los Angeles Department of Water and Power (LADWP) followed the California Environmental Quality Act (CEQA) noticing requirements, per the CEQA Guidelines, as they pertained to distribution of an IS/MND. Under CEQA Guidelines Section 15072(a), a lead agency (e.g., LADWP) must "provide notice of intent to adopt a negative declaration or mitigated negative declaration to the public, responsible agencies, trustee agencies, and the county clerk of each county within which the proposed project is located, sufficiently prior to adoption by the lead agency ...". As further stated in CEQA Guidelines Section 15072(b), the lead agency shall mail a notice of all organizations and individuals who have previously requested such a notice in writing and shall also give notice by **at least one** of the following methods: 1) publication in a newspaper of general circulation in the area affected; 2) posting of notice on and off site in the area; or, 3) direct mailing to owners and occupants of

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contiguous property. As is LADWP's standard practice, a notice of intent for the proposed project was posted with both Los Angeles County and City Clerks on January 29, 2004. LADWP also published the notice in the *Los Angeles Times* on Thursday, January 29, 2004. In addition to sending notices to responsible agencies, LADWP sent 1252 notices to occupants along the proposed project alignment. Although you did not directly receive a notice, the notice was published in the newspaper and made available at the field offices of Council District 2 and 6, as well as the Sun Valley Branch Library.

Additionally, the public comment period for the IS/MND was extended on four occasions, for a total duration of almost six months ending on July 21, 2004, to facilitate public outreach, review and comment on the proposed project. Also during the public comment period, LADWP meet with representatives of the Riverwood Ranch Homeowners Association on March 3, 2004 to discuss the proposed project. Regarding Riverwood Ranch access along Conover Fire Road, the location of the proposed storage tank would be coordinated with the US Forest Service and the City of Los Angeles Fire Department to ensure that all emergency access is maintained.

**Comment 2:** They also admitted that they were unaware of the numerous conditions placed upon the golf course by the City or of the City Ordinances which affect this area including the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan.

**Response:** No provisions of the Angeles National Golf Club Conditional Use Permit (CUP) would prevent the implementation of the proposed project. In fact, Condition 198 of the CUP specifically requires that the golf club, in order to reduce the demand on the water infrastructure, investigate with the LADWP the possibility of connecting to the East Valley Reclamation Project pipeline for the use of recycled water.

The proposed project, including the proposed water storage tank, would not be in violation of any City of Los Angeles ordinances, including the provisions of the San Gabriel/Verdugo Mountain Scenic Preservation Specific Plan. The Specific Plan sets forth provisions for Prominent Ridgeline and Scenic Highway Corridor protection. The proposed location of the tank along the Conover Fire Road is not within a designated Prominent Ridgeline or within an area 60 vertical feet from a Prominent Ridgeline. The linear portion of the proposed project would follow portions of Foothill Boulevard designated as a Scenic Highway Corridor, but there are no provisions in the Specific Plan that prohibit construction or operation of infrastructure within the scenic corridor. Also, there would be no visual impacts of the storage tank from the scenic corridor as the corridor area provisions extend 500 feet on either side of

Ms. Elaine Brown  
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the centerline of the roadway of each of the Scenic Highways and the proposed tank would be approximately 0.5 miles from Foothill Boulevard.

**Comment 3:** They had ignored or were unaware of the sensitive ecological areas west of the golf course.

**Response:** As addressed in detail in Section IV and Appendix B of the IS/MND, Significant Ecological Areas as well as special species and habitat, and wildlife corridors were addressed and analyzed. A portion of the proposed pipeline crosses the Tujunga Wash, a Los Angeles County Significant Ecological Area (SEA), at Glenoaks Boulevard. The pipeline would be mounted to the underside of the existing bridge at this location, thereby avoiding impacts to the wash or SEA. No significant impact is anticipated to occur because of the construction or operation of the proposed project.

**Comment 4:** Nor, did they, at a subsequent public meeting, have satisfactory and complete answers to the alarming questions regarding the safety of the aquifer.

**Response:** The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of recycled water by providing recycled water for landscape irrigation. To protect public health and safety, the State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of the recycled water facilities. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. Additionally the Los Angeles Regional Water Quality Control Board implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are protected. Recycled water proposed for distribution in this project would be required to meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment including filtration and disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable water quality standards. In fact, the Tillman recycled water presently meets all current drinking water standards for salt.

In addition, as part of the City's detailed monitoring of its water quality, in 2001, LADWP tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including the Tillman Water Reclamation Plant. No drug residues were detected in any of the samples.

While water use would be controlled and minimized at both of the facilities that will irrigate with recycled water as a result of the proposed project, it is assumed, and understood in the development of recycled water irrigation regulations, that some amount of water movement beyond the turf root system into the ground water is expected. The turf root system and soil matrix would effectively filter many potential contaminants as the water percolates into the groundwater. For example, an estimated 90 percent of nitrogen is removed from recycled water during infiltration, and preliminary research indicates nearly complete removal of many pharmaceuticals during groundwater infiltration. The small volume of water that is expected to pass through the turf root system to infiltrate into the ground water from these facilities, when mixed with large existing groundwater supplies, is expected to have a minimal effect on the drinking water supply.

LADWP as the major water supplier in Los Angeles has a commitment to maintaining the reliability of the City's potable water supply which includes water from groundwater sources. As with recycled water, there are existing monitoring programs that ensure quality of the groundwater is maintained. All uses of recycled water will be in strict compliance with directives issued by state and local health agencies.

Compliance with existing state and federal regulations regarding recycled water and user facility conditions would ensure a less than significant impact on water quality in the aquifer from the irrigation water that would be delivered by the proposed project.

**Comment 5:** They appear to have ignored the tremendous inconvenience, cost, and possible options.

**Response:** The commenter is incorrect that the inconvenience, cost, and possible options have been ignored. As required by CEQA, the IS/MND described and analyzed the potential impact of the construction and operation of the proposed project on the environment. Though construction is inconvenient, it is a necessary, and short-term, part of living in an urban environment. There are local standards, rules, and regulations that must be followed to manage the inconvenience to a generally acceptable level. As for possible options, originally the alignment for the proposed project went south of the Hansen Dam. This option was not pursued because it could significantly have affected the sensitive ecological areas west of the golf course.

Ms. Elaine Brown  
Page 5  
October 18, 2005

**Comment 6:** There are so many issues which have not been considered properly for this project that I wish to refer you to two letters which have been sent to you. Both of these thoroughly researched letters spell out those many and various problems which have not been dealt with in this mitigated declaration. They were written to you by Mary Bensen on February 25, 2004 and Bill Eick on February 25, 2004.

**Response:** Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 7:** This project cannot go forward without an Environmental Impact Report (EIR) and until the numerous issues put forth have been resolved. Recycled water is a great idea theoretically, but realistically it appears to need a lot more research and forethought.

**Response:** CEQA has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an IS. This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies an MND. If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an EIR.

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, a MND was prepared and publicly distributed for review and comment. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Ms. Elaine Brown  
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Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or are require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7, OFFICE OF PUBLIC TRANSPORTATION  
AND REGIONAL PLANNING  
IGR/CEQA BRANCH  
120 SOUTH SPRING STREET  
LOS ANGELES, CA 90012  
PHONE (213) 897-6696  
FAX (213) 897-1337



*Flex your power!  
Be energy efficient!*

February 24, 2004

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

Re: *Hansen Area Water Recycling Project*  
IGR/CEQA No. 040202/EA  
Vic. LA-210-PM  
SCH No. 2004011129

Dear Mr. Holloway:


Thank you for including the California Department of Transportation in the environmental review process for the proposed project to construct a recycled water pipeline approximately 26,900 liner feet long, a pump station, and a 1 MG water storage tank.

We note in the information received, that the proposed project involves open trenching along side State right-of-way. In all instances where the proposed work falls within or affects the State right-of-way such as constructions, grading, changes to hydraulic run-off, etc., a Caltrans encroachment permit will be needed, thus, plans will need to be reviewed by our Office of Permits.

Additionally, we understand that at I-210/Osborne Street interchange, access to the ramps may be partially or completely restricted during the construction period. We acknowledge and concur that temporary detour plans would need to be developed and approved by our Office of District Traffic Manager (DTM).

If you have any questions regarding our comments, you may call me at (213) 897 – 4429 and refer to record number 040202/EA.

Sincerely,

  
STEPHEN J. BUSWELL  
IGR/CEQA Program Manager  
Caltrans, District 7







ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Mr. Stephen Buswell  
State of California Department of  
Transportation  
District 7, Office of Public  
Transportation and Regional Planning  
120 South Spring Street  
Los Angeles, CA 90012

Dear Mr. Buswell:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** We [Caltrans] note that the proposed project involves open trenching along side state right-of-way. A Caltrans encroachment permit will be needed where the proposed work falls within or affects the state right-of-way.

**Response:** The Los Angeles Department of Water and Power (LADWP) will coordinate with Caltrans for any activities within or that affects state right-of-way. The comment is noted and will be incorporated into the final MND for review and consideration of the decisionmakers.

**Comment 2:** We understand that at I-210/Osborne Street interchange, access to the ramps may be partially or completely restricted during construction. We acknowledge and concur that a temporary detour plan would need to be developed and approved by our Office of District Traffic Manager.

**Response:** If construction of the proposed project would partially or completely restrict access to the ramps at the I-210/Osborne Street, LADWP will develop a temporary detour plan that would be sent to Caltrans' Office of District Traffic Manager for review and approval. The comment is noted and will be incorporated into the final MND for review and consideration of the decisionmakers.

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111 North Hope Street, Los Angeles, California 90012-2607 Mailing address: Box 51111, Los Angeles 90051-5700  
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Mr. Stephen Buswell  
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October 18, 2005

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez

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

Kim Clark  
10369 Silverton Ave.  
Tujunga, CA 91042

April 9, 2004

RE: Recycled Water Project for the Los Angeles International Golf course and other users in the Hansen Dam area

Dear Mr. Holloway,

I have been a resident, home and land owner in the Tujunga area for 28 years, and plan to be here for the duration. This letter is to express my concerns regarding the introduction of recycled water into the greater Tujunga Watershed area, and to request a full EIR on the proposed project.

I am focused on two major areas of concern which are 1) the use of recycled water in the Tujunga Watershed area which is an important supply of fresh water for the City of Los Angeles as well as an ecologically diverse and delicate area which serves as the habitat for several endangered species; and 2) new information now available on the developing complexities of using recycled water, what's in it, where it ends up, and some emerging issues.

The Los Angeles International golf course would be the first customer, and many more are planned to follow once the infrastructure is in place. While I agree with the principals of reducing waste of potable water (which was an issue I forwarded in the original LAI golf course EIRs over 12 years ago), it is also important to review projects in light of the latest, most technologically advanced information for decision making purposes. Because of new information and technology that has become available in recent years, even months, I do not think the several-year-old Addendum EIR for the use of recycled water at the LAI golf course is sufficient. I request the public have the opportunity to participate in a full EIR on the proposed project to address the increasingly complex issues surrounding the use of recycled water in major aquifers such as the Tujunga Watershed.

Directly below the LAI Golf Course is an ecologically sensitive area containing many diverse species, including several which are federally listed as endangered. The US Fish and Wildlife Service will need to review the project, as it will directly affect this contiguous, downstream habitat. A full EIR will help to ensure proper safeguards are in place to protect this vital habitat.

Sincerely,



Kim Clark

Cc:  
Habitat Works of Southern California  
Tujunga Watershed Stakeholders





ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Kim Clark  
10369 Silverton Avenue  
Tujunga, CA 91042

Dear Ms. Clark:

**Subject:** Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** I've been a resident, home and land owner in the Tujunga area for 28 years .... express my concerns regarding the introduction of recycled water into the greater Tujunga Watershed area, and to request a full Environmental Impact Report (EIR) on the proposed project.

**Response:** Your comment is noted and will be incorporated into the final MND for review and consideration of the decisionmakers.

**Comment 2:** I am focused on two major areas of concern... 1) the use of recycled water in the Tujunga Watershed area which is an important supply of fresh water for the City of Los Angeles as well as an ecologically diverse and delicate area which serves as the habitat for several endangered species ...

**Response:** The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of reclaimed/recycled water by providing recycled water for landscape irrigation. The State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of

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the recycled water facilities. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. Additionally, the Los Angeles Regional Water Quality Control Board implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are protected. Recycled water proposed for distribution in this project would be required meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment, including filtration and disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable recycled water quality standards.

In addition, as part of the City's detailed monitoring of its water quality, in 2001, the Los Angeles Department of Water and Power (LADWP) tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including the Tillman Water Reclamation Plant. No drug residues were detected in any of the samples.

The Angeles National Golf Club (ANGC), one of the proposed customers for this project, is a state of the art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their Conditional Use Permit (CUP). Per their CUP, once irrigation water has been delivered to the site, Condition 28 for operation of the golf course is triggered. Condition 28 requires monitoring of local surface water and groundwater quality before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires monitoring and mitigation of water quality and quantity concerns for Tujunga Ponds. Condition 127 states that the irrigation input of water shall be at a replacement rate only. Condition 138 says the golf course shall be designed to maximize infiltration and minimize runoff. Condition 139 requires the golf course to develop and implement a water quality monitoring program. Condition 194 requires that the golf course irrigation system be designed to minimize the number of acres receiving irrigation and be designed so non-essential turf areas would not be watered during droughts. Condition 196 requires that the irrigation system include computerized controls to avoid unnecessary watering and minimize water loss through evaporation. Condition 197 requires a landscape plan for the course that emphasizes low water consumption grasses wherever possible. And finally, Condition 198 requires

that the golf course, in order to reduce the demand on the water infrastructure, investigate with the LADWP the possible use of an on-site well and the possibility of connecting to the East Valley Reclamation Project pipeline for the use of recycled water. Irrigation water use is effectively minimized at ANGC through design features, as required by the above Conditions. Modern irrigation controllers coupled with weather monitoring devices allow the golf club to precisely determine and deliver the appropriate amount of water for the drought-tolerant hybrid Bermuda grass used as the primary turf on the club's tees, fairways and roughs. This system allows computers to send a signal to satellites in the field that change irrigation run times based on current heat, wind, solar radiation and humidity. Daily monitoring of the irrigation system for distribution uniformity aids in maximizing system efficiency and minimizing excess irrigation.

Under normal operating conditions, all water being used for irrigation will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a subgrade drainage system beneath putting greens, tees, and various areas in roughs and fairways is designed to collect and convey on site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all appropriate irrigation water quality parameters are met.

In addition, ANGC includes preserve areas of native plants, and mitigation (measure 40) that specifically indicates that turf areas shall be graded to direct drainage away from the preserve areas. Furthermore, mitigation measure 41 approved as part of the ANGC project specifically indicates that "... as designed, there should be no movement of water from the golf course to the preserve. Precisely controlled irrigation systems will minimize runoff of irrigation waters. All drainage is away from the preserve so that even during storm events no runoff should reach the preserve from the golf course area." In addition, the ANGC has an extensive surface and groundwater monitoring program to ensure that pre-ANGC water quality is maintained. Therefore, with the conditions placed on the golf course, it is anticipated that incidental runoff (small amounts of runoff from over-spray of sprinklers or overflow during major storm events) would be very minimal and not substantial and therefore, not considered a significant or adverse impact on local wildlife or habitat.

The City of Los Angeles Department of Recreation and Parks' Hansen Dam Recreation Area (HDRA), the other proposed customer for this project, uses Best Management Practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File 166080), as required by the California State Assembly Bill AB325, to ensure local water quality and reduce potential runoff.

LADWP as the major water supplier in Los Angeles has a commitment to maintaining the reliability of the City's potable water supply which includes water from groundwater sources. As with recycled water, there are existing monitoring programs that ensure quality of the groundwater is maintained. All uses of recycled water will be in strict compliance with directives issued by state and local health agencies.

In the biological resources technical memorandum that was prepared for the IS/MND, fourteen (14) special status plant species and fourteen (14) special status wildlife species were identified as potentially present in the project region, or have some potential to occur in the project area. Because the areas proposed for construction are areas historically or currently disturbed, none of these plant/wildlife species were determined to be expected to occur within the project footprint area. In areas of construction and operation where potential habitat exists (e.g., proposed tank site), the proposed project footprint would be placed to avoid the areas with potential to support these species. The operation of the proposed project would not have a significant impact on local wildlife or habitat because: 1) the irrigation water's quality is regulated by numerous state and federal regulations; 2) there are strict monitoring requirements and procedures in place to mitigate any potential water quality concerns to surface or ground water at the ANGC; 3) the ANGC irrigation system is designed such that recycled and potable water can be blended within the system to obtain desired water quality objectives; 4) the ANGC has been designed to minimize irrigation and to collect excess water on site for re-use in their irrigation system; and 5) HDRA uses Best Management Practices (BMPs) to ensure local water quality and reduce potential runoff. No significant impacts to sensitive species are anticipated to occur.

**Comment 3:** ...and 2) new information now available on the developing complexities of using recycled water, what's in it, where it ends up, and some emerging issues.

**Response:** As stated above, to ensure an appropriate level of treatment for the protection of public health, the DHS has established treatment requirements for a variety of recycled water uses. Under these regulations, recycled water must be treated to an appropriate level to protect surface water and to prevent transmission of pathogens. The level of treatment varies with the ultimate of the recycled water. At a minimum, wastewater must receive secondary treatment prior to use as recycled water. Those uses with the highest potential for human exposure are permitted if the water has received disinfected tertiary treatment. Recycled water planned to be delivered through the project facilities has received full tertiary treatment including filtration for pathogen removal and disinfection. This water would meet all state and federal water quality criteria for recycled water supplies. DHS and the Los Angeles Regional Water Quality



Ms. Kim Clark  
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Control Board (RWQCB) set forth standards and guidelines for water quality which protect public health and ensure that water resources are not degraded.

**Comment 4:** The Los Angeles International golf course would be the first customer, and many more are planned to follow once the infrastructure is in place. While I agree with the principals of reducing waste of potable water, it is also important to review projects in light of the latest, most technologically advanced information .... because of new information and technology that has become available in recent years, even months, I do not think the several-year-old Addendum EIR for the use of recycled water at the LAI golf course is sufficient. I request the public have the opportunity to participate in a full EIR on the proposed project to address the increasingly complex issues surrounding the use of recycled water in major aquifers such as the Tujunga Watershed.

**Response:** The proposed customers for the Hansen Area Water Recycling Project would be the Angeles National Golf Club and the Hansen Dam Recreation Area. Water recycling is not a new technology; recycled water has been used throughout the United States for over 50 years. The State of California encourages the use of recycled water in order to preserve potable water supplies.

Several legislative and regulatory standards exist (e.g., State Health and Safety Code, Water Code, and Title 17 and 22 of the California Code of Regulations) that define and regulate the use of recycled water. DHS and RWQCB monitor and enforce these regulations. New information and technologies would be addressed by these enforcement agencies. The recycled water that would be distributed by the proposed project would be required to meet all the most current and applicable regulatory standards and requirements through permits obtained from DHS and RWQCB.

The proposed project does not rely on the Los Angeles Golf Course EIR for any part of the environmental review process. The IS/MND for the Hansen Area Water Recycling Project satisfies the requirements for environmental evaluation under the California Environmental Quality Act (CEQA).

CEQA has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an Initial Study (IS). This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies a Mitigated Negative Declaration (MND). If the IS indicates that a proposed project may have a significant impact on the environment,

Ms. Kim Clark  
Page 2  
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even with mitigation, then the Lead Agency prepares, distributes, and certifies an Environmental Impact Report (EIR).

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors for project construction and operation. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, a MND was prepared and publicly distributed for review and comment.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decisionmakers.

**Comment 5:** Directly below the LAI Golf Course is an ecologically sensitive area containing many diverse species, including several which are federally listed as endangered. The US Fish and Wildlife Service will need to review the project, as it will directly affect this contiguous, downstream habitat. A full EIR will help to ensure proper safeguards are in place to protect this vital habitat.

**Response:** Construction and operation of the proposed project is not anticipated to directly impact resources under the jurisdiction of the U.S. Fish and Wildlife (USFWS) pursuant to the federal Endangered Species Act. A project is not required to be reviewed by the USFWS if there is no anticipated impact that is subject to their jurisdiction. If a project were to impact a federally listed Threatened or Endangered species, approval to impact (take) a listed species would be required. Your comment is noted and will be incorporated into the final MND for review and consideration of the decisionmakers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be

Ms. Kim Clark  
Page 2  
October 18, 2005

contacted at (213) 367-1350. If you have any questions or are require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,

A handwritten signature in cursive script that reads "Charles C. Holloway".

Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez



February 27, 2004

Charles Holloway  
Los Angeles Department of Water & Power  
Environmental Affairs  
Room 1044  
111 No. Hope Street  
Los Angeles, CA 90012

Dear Mr. Charles Holloway:

Re: Notice of Availability/Notice of Intent to Adopt an Initial Study/Proposed  
Mitigation Negative Declaration for Hansen Area Water Recycling Project.  
No: 95-0286-CUC CUBE GAC SCH 9505/1004

We are residents of Shadow Hills for 46 years at 10040 Wentworth Street and members of the Shadow Hills Property Owners Association, the Sunland-Tujunga Neighborhood Council and the Lake View Terrace-La Tuna Canyon-Shadow Hills Neighborhood Council. As community members, we are interested in projects affecting this community, surrounding communities and the Scenic Corridors (Foothill Freeway I 210, Foothill Blvd and Wentworth Street) as specified in the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan.

Notification for public comments in reference to the proposed Water Recycling Project reached us this week. In order to respond constructively, it is imperative to allow citizens to learn about the plan and its implications in relation to the Community Plan and the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan. An extension for public comments is important. We would appreciate information in reference to the Water Recycling Project and an opportunity to attend meetings/workshops designed for presentations and discussion to inform community members affected by the project.

Thank You.

Sincerely,

*Ivan E. Cole*  
*Roberta C. Cole*

Ivan E & Roberta C Cole  
10040 Wentworth Street  
Shadow Hills, CA 91040-1246

*P.S. Brian  
to sending this  
via Fax, was  
informed that  
the comment date  
was extended  
9/2/04.*





ANTONIO R. VILLARAIGOSA  
Mayor

RONALD E. DEATON, *General Manager*

October 18, 2005

Mr. and Mrs. Ivan Cole  
10040 Wentworth Street  
Shadow Hills, CA 91040-1246

**Subject:** Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** We are residents of Shadow Hills for 46 years and members of several property owner/neighborhood associations/councils. We are interested in projects affecting this community, surrounding communities and the Scenic Corridors. Notification for public comments regarding project reached us this week. In order to respond constructively, it is imperative to allow citizens to learn about the plan and its implications on the community in relation to existing plans. An extension for public comments is important.

**Response:** Since the release of the IS/MND for the Hansen Area Water Recycling Project, the Los Angeles Department of Water and Power (LADWP) staff has participated in several community meetings. In addition, at the request of the public, the review period for the document was extended until July 21, 2004, for a total of 175 days of public review.

**Comment 2:** We would appreciate information in reference to the project and an opportunity to attend meetings/workshops designed for presentations and discussion to inform community members affected by the project.

**Response:** Your contact information will be added to the projects list of interested persons for future mailings related to the proposed project. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

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



Mr. and Mrs. Ivan Cole  
Page 2  
October 18, 2005

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or are require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez



April 9, 2004

Charles Holloway  
111 North Hope Street  
Room 1044  
Los Angeles CA 90012

Subject: Hansen Area Water Recycling Project

Dear Mr. Holloway,

Numerous inaccuracies in the project's Mitigated Negative Declaration suggest an inadequate study of the pipe route's geography and logistics. (For instance, south of the 210 Wheatland exit is a natural area which needs to be protected -- it should NOT be used for a construction staging area.)

However, even very serious safety, environmental and logistical issues associated with construction of the pipeline itself are of comparatively minor importance, compared to the much more serious issue of what will come OUT of that pipeline.

There is so much NEW knowledge about health hazards in recycled wastewater, including hundreds of DBP's (drinking water disinfection by-products) that were not even recognized as environmental hazards just a few short years ago, that any previous studies associated with the golf course's original EIR have been rendered obsolete. Additionally, the high salt & boron content in recycled wastewater may not kill turf, but it is extremely damaging for native plants, trees and bushes. And we have no idea of the effect that even trace amounts of residual medications will have on wildlife that live adjacent to the proposed irrigated areas.

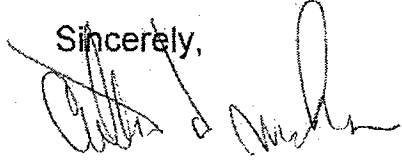
Therefore, I urgently request that a FULL "Environmental Impact Report" (EIR) be done for the Hansen Area (waste) Water Recycling Project.

It would be reckless to take the unnecessary risk of pushing the Hansen Area Recycled wastewater project forward, until technology has caught up with this new awareness of the risks & hazards. For all these reasons, Lopez Landfill is a more appropriate first customer for this water - the landfill is high above the water table, lined to prevent water leakage, and provides an ideal laboratory environment in which to monitor and test the long-term results of irrigating with recycled water. Furthermore, the

infrastructure to get the water up to the landfill is already in place (pumping station, pipe, 1 MG tank).

There is so much at stake in terms of both human health and environmental health -- a full E.I.R. is not unreasonable to demand.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arthur Drucker', written over the word 'Sincerely,'.

Arthur Drucker  
10047 McBroom St  
Sunland, Ca 91040

Cc:  
Tujunga Watershed Council  
PO Box 176  
Sunland CA 91041



ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Mr. Arthur Drucker  
10047 McBroom Street  
Sunland, CA 91040

Dear Mr. Drucker:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** Numerous inaccuracies in the project's Mitigated Negative Declaration suggest an inadequate study of the pipe route's geography and logistics. (For instance, south of the 210 Wheatland exit is a natural area that needs to be protected – it should NOT be used for a construction staging area).

**Response:** The Los Angeles Department of Water and Power (LADWP) will not utilize the I-210 Wheatland exit as a staging area. As local community members have suggested, an alternate staging area in close proximity to the proposed I-210/Wheatland exit has been proposed. This new staging area is adjacent to the Hansen Dam Sports Complex and is currently leased by Valley Crest Tree Company for tree storage. LADWP proposes to use this site instead of the I-210/Wheatland site. If this site is unavailable, then LADWP proposes to use another site in close proximity to the proposed project alignment but not the I-210/Wheatland site.

**Comment 2:** However, even very serious safety, environmental and logistical issues associated with construction of the pipeline itself are of comparatively minor importance, compared to the much more serious issue of what will come OUT of that pipeline. There is so much NEW knowledge about health hazards in recycled wastewater, including hundreds of DBP's that were not even recognized as environmental hazards just a few short years ago, that any previous studies associated with the golf course's original Environmental Impact Report (EIR) have been rendered obsolete. Additionally, the high salt and boron content in recycled wastewater may not kill turf, but it is extremely damaging for native plants, trees, and bushes. And we have no idea of the effect that even trace amounts of residual medications will have on wildlife that live adjacent to the proposed irrigated areas.

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



Mr. Arthur Drucker  
Page 2  
October 18, 2004

**Response:** The proposed project does not rely on the golf courses EIR for any part of the environmental review process. The IS/MND for the Hansen Area Water Recycling Project satisfies the requirements for environmental evaluation under the California Environmental Quality Act (CEQA).

The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of recycled water by providing recycled water for landscape irrigation. The State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of the recycled water facilities. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. Additionally the Los Angeles Regional Water Quality Control Board implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are preserved. Recycled water proposed for distribution in this project would be required to meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment, including filtration and disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable water quality standards. In fact, although the salt concentration of recycled water from the Tillman Plant is higher than that which would be provided via the LADWP potable water system, the Tillman recycled water presently meets the current drinking water standards for salt.

In addition, as part of the City's detailed monitoring of its water quality, in 2001, LADWP tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including the Tillman Water Reclamation Plant. No drug residues were detected in any of the samples.

The Angeles National Golf Club (ANGC), one of the proposed customers for this project, is a state of the art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their Conditional Use Permit (CUP). Per their CUP, once irrigation water has been delivered

to the site, Condition 28 for operation of the golf course is triggered. Condition 28 requires monitoring of local surface water and groundwater quality before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires monitoring and mitigation of water quality and quantity concerns for Tujung Ponds. Condition 127 states that the irrigation input of water shall be at a replacement rate only. Condition 138 says the golf course shall be designed to maximize infiltration and minimize runoff. Condition 139 requires the golf course to develop and implement a water quality monitoring program. Condition 194 requires that the golf course irrigation system be designed to minimize the number of acres receiving irrigation and be designed so non-essential turf areas would not be watered during droughts. Condition 196 requires that the irrigation system include computerized controls to avoid unnecessary watering and minimize water loss through evaporation. Condition 197 requires a landscape plan for the course that emphasizes low water consumption grasses wherever possible. And finally, Condition 198 requires that the golf course, in order to reduce the demand on the water infrastructure, investigate with the LADWP the possible use of an on-site well and the possibility of connecting to the East Valley Reclamation Project pipeline for the use of recycled water.

Irrigation water use is effectively minimized at ANGC through design features, as required by the above Conditions. Modern irrigation controllers coupled with weather monitoring devices allow the golf club to precisely determine and deliver the appropriate amount of water for the drought tolerant hybrid Bermuda grass used as the primary turf on the club's tees, fairways and roughs. This system allows computers to send a signal to satellites in the field that change irrigation run times based on current heat, wind, solar radiation and humidity. Daily monitoring of the irrigation system for distribution uniformity aids in maximizing system efficiency and minimizing excess irrigation.

Under normal operating conditions, all water being used for irrigation will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a sub-grade drainage system beneath putting greens, tees, and various areas in roughs and fairways is designed to collect and convey on site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all appropriate irrigation water quality parameters are met.

In addition, ANGC includes preserve areas of native plants, and mitigation (measure No. 40) that specifically indicates that turf areas shall be graded to direct drainage away from the preserve areas. Furthermore, mitigation measure No. 41 approved as part of the ANGC project specifically indicates that "... as designed, there should be no

movement of water from the golf course to the preserve. Precisely controlled irrigation systems will minimize runoff of irrigation waters. All drainage is away from the preserve so that even during storm events no runoff should reach the preserve from the golf course area." In addition, the ANGC has an extensive surface and groundwater monitoring program to ensure that pre-ANGC water quality is maintained. Therefore, with the conditions placed on the golf course, it is anticipated that incidental runoff (small amounts of runoff from over-spray of sprinklers or overflow during major storm events) would be very minimal and not substantial and therefore, not considered a significant or adverse impact on local wildlife or habitat.

The City of Los Angeles Department of Recreation and Parks' Hansen Dam Recreation Area (HDRA), the other proposed customer for this project, uses Best Management Practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File No. 166080), as required by the California State Assembly Bill AB325, to ensure local water quality and reduce potential runoff.

The operation of the proposed project would not have a significant impact on local wildlife or habitat because: 1) the irrigation water's quality is regulated by numerous state and federal regulations; 2) there are strict monitoring requirements and procedures in place to mitigate any potential water quality concerns to surface or groundwater at the ANGC; 3) the ANGC irrigation system is designed such that recycled and potable water can be blended within the system to obtain desired water quality objectives; 4) the ANGC has been designed to minimize irrigation and to collect excess water on site for re-use in their irrigation system; and 5) HDRA uses BMPs to ensure local water quality and reduce potential runoff.

Potential impacts on sensitive biological resources are further described in Appendix B of the IS/MND (Biological Resources Technical Memorandum).

**Comment 3:** Therefore, I urgently request that a FULL EIR be done for the Hansen Area (waste) Water Recycling Project.

**Response:** CEQA has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an IS. This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies an MND. If the IS indicates that a proposed project may have a

significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an EIR. For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, a MND was prepared and publicly distributed for review and comment.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 4:** It would be reckless to take the unnecessary risk of pushing the Hansen Area Recycled wastewater project forward, until technology has caught up with this new awareness of the risks & hazards. For all these reasons, Lopez Landfill is a more appropriate "first customer" for this water – the landfill is high above the water table, lined to prevent water leakage, and provides an ideal laboratory environment in which to monitor and test the long-term results of irrigating with recycled water. Furthermore, the infrastructure to get water up to the landfill is already in place (pumping station, pipe, 1 MG tank).

**Response:** The quality of recycled water distributed through the proposed project would meet all federal and state water quality requirements.

Lopez Canyon Landfill (LCL) is not being proposed as a customer as part of this project. Supplying recycled water to LCL would require the development of a system with sufficient hydraulic capacity to serve the water demand at adequate pressure. The HDRA and the ANGC are physically situated at elevations and locations that can be immediately served by utilizing the proposed pumping station at the Valley Generating Station (VGS) to lift the water to the proposed storage tank at a hydraulic grade of approximately 1,405 feet. Trying to use a single pump station at VGS to pump to the top of LCL would result in pressures too great for service at lower elevations such as at HDRA.

The existing pump station at LCL could be used to pump the water to Lopez Canyon Landfill if the LCL pipe system were re-designed so that irrigation water and industrial water would be completely separated from potable water uses; however, operating the LCL pump station without the proposed storage tank at ANGC would result in a system of two pump stations located in series without a storage tank. This type of system has the potential to cause cavitation of the pumps or pressure surges throughout the recycled water distribution scheme. To serve the LCL, the water would need to be

Mr. Arthur Drucker  
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pumped from the proposed storage tank to the existing LCL tank located on top of the landfill.

If a future project were to propose to extend a recycled water pipeline to LCL, the proposed project's pump station and storage tank would provide a system that (1) could operate at pressures which could continue to serve customers at lower elevations, and (2) would have the storage capacity to help provide adequate suction pressure for the existing LCL Pump Station to operate without causing cavitation of the pumps or pressure surges. Any proposed future project would undergo an environmental evaluation as required under CEQA.

**Comment 5:** There is so much at stake in terms of both human health and environmental health – a full EIR is not unreasonable to demand.

**Response:** Please refer to the Response to Comment 5. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
c: Ms. Sarah Easley Perez



# MESSAGE CONFIRMATION

02/26/2004 12:01

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WILLIAM E. EICK  
ATTORNEY AT LAW  
2604 Foothill Boulevard, Suite C  
La Crescenta, California 91214  
Phone (818) 248-0050  
Fax (818) 248-2473

---

## FACSIMILE COVER SHEET

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DATE: 2/25/04

TO: Charles Holloway

NAME: LADWP

FAX NUMBER: 213-367-3582

SUBJECT: Letter from SHPOA to LADWP re. Hansen Area Water Recycling Project

FROM: William E. Eick

NUMBER OF PAGES (including cover sheet): 6

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***The information contained in this facsimile message is intended only for the personal and confidential use of the designated recipient named above. This message may be an attorney-client communication and as such is privileged and confidential.***

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***If you have received this communication in error, please notify us immediately by telephone and return the original message to us by mail. Thank you.***

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COMMENTS: Also enclosed please find the two cover sheets to the report in question which report was prepared by MWH.

**WILLIAM E. EICK**  
ATTORNEY AT LAW  
2604 FOOTHILL BOULEVARD, SUITE C  
LA CRESCENTA, CALIFORNIA 91214

TELEPHONE: (818) 248-0050

FACSIMILE: (818) 248-2473

February 25, 2004

Los Angeles Department of Water and Power  
Environmental Affairs  
Attention: Charles Holloway  
111 N. Hope Street, Room 1004  
Los Angeles, California 90012

Re: Comments to Hansen Area Water Recycling Project IS/MND

Dear Mr. Holloway:

I represent the Shadow Hills Property Owners Association (SHPOA). Our conclusion is that this project needs an environmental impact report, not a mitigated negative declaration. In particular, your analysis either fails to consider or in fact improperly analyzes many aspects of the proposal including but not limited to the following:

1. It is my understanding that this water can only be used for irrigation and cannot be used to be part of the water supply (i.e. irrigation yes; toilet to tap no). In fact, the water proposed to irrigate the Angeles Golf Course will go directly into the water supply. The water table at the golf course is approximately 25 feet from the surface and less during the rainy season. Much of the water then re-surfaces immediately west of the 210 freeway by way of the Tujunga Ponds where it traverses downstream, held behind the Hansen Dam and ultimately diverted into the Los Angeles County drinking water spreading grounds. In short, this water cannot be used on the Angeles Golf Course.
2. The MND fails to consider the fact that immediately west of the 210 freeway is a mitigation bank nature preserve run by the Los Angeles County Department of Public Works. This "irrigation" water immediately resurfaces in the Tujunga Ponds and will contaminate this preserve area which contains endangered plants and animals. This reclaimed water will undoubtedly contaminate and irrevocably harm this preserve area.
3. The land use regulations in the area do not permit the construction of a 1 million

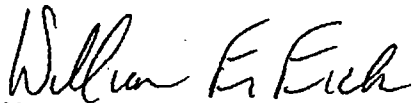
- gallon water tank. The Angeles Golf Course has strict requirements as part of its conditional use permit and does not include the construction of such a tank.
4. Because of the sensitive nature of the habitat, the Golf Course Conditional Use Permit has many restrictions including water quality restrictions. The golf course could be forced to cease operations or stop using the DWP reclaimed water if the golf course operations degrade the downstream water supply. The downstream water is monitored quarterly by the County of Los Angeles as part of mitigation bank preserve requirements insisted upon by the California Department of Fish and Game. The cost of this DWP project could easily be lost if the golf course shuts down or if it is required to discontinue the use of the DWP water.
  5. The 1 million gallon water tower is being built on an earthquake fault. The MND states that this is not a problem because if the tank bursts the water will only go into the Tujunga Wash. The golfers playing the Angeles Golf Course, the hikers or the trail riders might think it is a big problem if the water comes cascading down on them. The DWP would also probably ruin the portion of the golf course which it then may be required to fix. In addition, the tank may violate the newly enacted Scenic Corridor Plan.
  6. One of the biggest issues in the development of the golf course was obtaining the required permits from the Army Corp of Engineers under the Clean Water Act and a stream alteration permit from the California Department of Fish and Game. Discharging recycled water onto the golf course which will then percolate into or run off into jurisdictional waters will require permits. It may even require the Army Corp to consult with the U.S. Fish and Wildlife Service under Section 7. This permit process was not addressed in the MND.
  7. The MND failed to consider several sources of information which resulted in the failure to analyze all of the aspects of the project. The following should have been reviewed:
    - 7.1 All information from the Los Angeles County Department of Public Works concerning the preserve area including the EIR which was prepared.
    - 7.2 All information about water quality monitoring.
    - 7.3 The EIR prepared in connection with the Golf Course development.
    - 7.4 The extensive conditions of the conditional use permit for the golf course.

LADWP  
Charles Holloway  
2/25/04  
Page 3

7.5 The Scenic Corridor Plan passed in December, 2003 by the Los Angeles City Council.

In summary, the MND does not adequately address the environmental concerns. The Department of Water and Power should complete an environmental impact report.

Very truly yours,



William E. Eick,  
Attorney for SHPOA

cc. Hon. Wendy Greuel

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**County of Los Angeles  
Department of Public Works**

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**Water Quality Monitoring  
2003 Annual Report**

for the

**Master Mitigation Plan for the Big Tujunga  
Wash Mitigation Bank**

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February 2004



**MWH**

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**Water Quality Monitoring  
2003 Annual Report**

for

**Master Mitigation Plan for the Big Tujunga Wash  
Mitigation Bank**

February 2004

*Prepared For:*

**Chambers Group, Inc.  
17671 Cowan Avenue, Suite 100  
Irvine, California 92614**

*Prepared By:*

**MWH  
301 North Lake Avenue, Suite 600  
Pasadena, California 91101**

---







ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Mr. William Eick  
2604 Foothill Boulevard  
Suite C  
La Crescenta, CA 91214

Dear Mr. Eick:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** I represent the Shadow Hills Property Owners Association (SHPOA). Our conclusion is that this project needs an environmental impact report, not a mitigated negative declaration. In particular, your analysis either fails to consider or in fact improperly analyzes many aspects of the proposal including but not limited to the following:

**Response:** Please see the responses provided below for each concern raised regarding the scope, accuracy, and adequacy of the analysis in the IS/MND. The California Environmental Quality Act (CEQA) has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an Initial Study (IS). This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies a Mitigated Negative Declaration (MND). If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an Environmental Impact Report (EIR).

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



Mr. William Eick  
Page 2  
October 18, 2005

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, a MND was prepared and publicly distributed for review and comment.

**Comment 2:** It is my understanding that this water can only be used for irrigation and cannot be used to be part of the water supply. In fact, the water proposed to irrigate the Angeles Golf Course will go directly into the water supply. The water table at the golf course is approximately 25 feet from the surface and less during the rainy season. Much of the water then re-surfaces immediately west of the 210 freeway by way of the Tujunga Ponds where it traverses downstream, held behind the Hansen Dam and ultimately diverted into the Los Angeles County drinking water spreading grounds. In short, this water cannot be used on the Angeles Golf Course.

**Response:** The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of recycled water by providing recycled water for landscape irrigation. To protect public health and safety, the State of California has specific regulations regarding use of recycled water. Recycled water proposed for distribution in this project would be required meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment, including filtration for disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable recycled water quality standards.

The Angeles National Golf Club (ANGC), one of the proposed customers for this project, is a state of the art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their Conditional Use Permit (CUP). Per their CUP, once irrigation water has been delivered to the site, Condition 28 for operation of the golf course is triggered. Condition 28 requires monitoring of local surface water and groundwater quality before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires monitoring and mitigation of water quality and quantity concerns for Tujunga Ponds. Condition 127 states that the irrigation input of

water shall be at a replacement rate only. Condition 138 says the golf course shall be designed to maximize infiltration and minimize runoff. Condition 139 requires the golf course to develop and implement a water quality monitoring program. Condition 194 requires that the golf course irrigation system be designed to minimize the number of acres receiving irrigation and be designed so non-essential turf areas would not be watered during droughts. Condition 196 requires that the irrigation system include computerized controls to avoid unnecessary watering and minimize water loss through evaporation. Condition 197 requires a landscape plan for the course that emphasizes low water consumption grasses wherever possible. And finally, Condition 198 requires that the golf course, in order to reduce the demand on the water infrastructure, investigate with the Los Angeles Department of Water and Power (LADWP) the possible use of an on-site well and the possibility of connecting to the East Valley Reclamation Project pipeline for the use of recycled water.

Irrigation water use is effectively minimized at ANGC through design features, as required by the above Conditions. Modern irrigation controllers coupled with weather monitoring devices allow the golf club to precisely determine and deliver the appropriate amount of water for the drought-tolerant hybrid Bermuda grass used as the primary turf on the club's tees, fairways and roughs. This system allows computers to send a signal to satellites in the field that change irrigation run times based on current heat, wind, solar radiation and humidity. Daily monitoring of the irrigation system for distribution uniformity aids in maximizing system efficiency and minimizing excess irrigation.

Additionally, under normal operating conditions, all water being used for irrigation will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a subgrade drainage system beneath putting greens, tees, and various areas in roughs and fairways is designed to collect and convey on site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all appropriate irrigation water quality parameters are met.

The City of Los Angeles Department of Recreation and Parks' Hansen Dam Recreation Area (HDRA), the other proposed customer for this project, uses Best Management Practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File 166080), as required by the California State Assembly Bill AB325, to ensure local water quality and reduce potential runoff.

Although water use is minimized at both of these facilities, it is assumed, and understood in the development of recycled water irrigation regulations, that some amount of water movement beyond the turf root system into the groundwater is expected. The turf root system and soil matrix would effectively filter many potential contaminants as the water percolates into the groundwater. For example, an estimated 90% of nitrogen is removed from recycled water during infiltration, and preliminary research indicates nearly complete removal of many pharmaceuticals during groundwater infiltration. The small volume of recycled water, or recycled water mixed with potable water, that is expected to pass through the turf root system to infiltrate into the groundwater from these facilities, when mixed with large existing groundwater supplies, is expected to have a minimal effect on the drinking water supply.

Compliance with existing state and federal regulations regarding recycled water and user facility conditions would ensure a less than significant impact on the water supply from the irrigation water that would be delivered by the proposed project.

**Comment 3:** The MND fails to consider the fact that immediately west of the 210 freeway is a mitigation bank nature preserve run by the Los Angeles County Department of Public Works. This "irrigation" water immediately resurfaces in the Tujunga Ponds and will contaminate this preserve area which contains endangered plants and animal. This reclaimed water will undoubtedly contaminate and irrevocably harm this preserve area.

**Response:** The construction and operation of the proposed project is not expected to have an impact on the Big Tujunga Wash Mitigation Bank. Construction will not occur on, or in proximity to, the preserve. The operation of the proposed project would not have a significant impact on downstream water bodies, plants or animals because: 1) the irrigation water's quality is regulated by numerous state and federal regulations; 2) there are strict monitoring requirements and procedures in place to mitigate any potential water quality concerns to surface or groundwater at the ANGC; 3) the ANGC irrigation system is designed such that recycled and potable water can be blended within the system to obtain desired water quality objectives; and 4) the ANGC has been designed to minimize irrigation and to collect excess water on site for re-use in their irrigation system.

Recycled water proposed to be distributed through the project facilities would receive full tertiary treatment as specified under Title 22 and disinfection. This water would meet all current state and federal water quality criteria for recycled water supplies. Water delivered to the HDRA and ANGC would be used for irrigation of turf areas only. Beyond the use of drought resistant grass, turf management practices, including

irrigation optimization that conserves water (e.g., limiting areas to be irrigated) and evaporation would limit the area where recycled water would be used.

In addition to regulatory agency guidelines, the operation of the ANGC involves numerous water quality measures that limit the area that would be in contact with the recycled water (e.g., away from native plant areas, including known populations of slender-horned spineflower). Condition 28 requires the monitoring of local surface water and groundwater quality conditions before and during the operation of the golf course. In addition, Condition 49 addresses requirements for the "Golf Course Management Plan" including control of chemicals for water quality management. Condition 138 requires the golf course to be designed to maximize infiltration and minimize runoff. And finally, Condition 139 requires the golf course to develop and implement a water quality monitoring program.

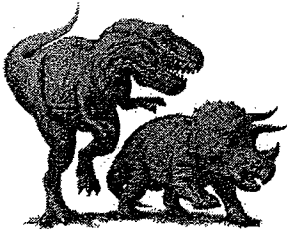
In addition, ANGC includes preserve areas of native plants, and mitigation (Measure 40) that specifically indicates that turf areas shall be graded to direct drainage away from the preserve areas. Furthermore, Mitigation Measure 41 approved as part of the ANGC project specifically indicates that "... as designed, there should be no movement of water from the golf course to the preserve. Precisely controlled irrigation systems will minimize runoff of irrigation waters. All drainage is away from the preserve so that even during storm events no runoff should reach the preserve from the golf course area." In addition, the ANGC has an extensive surface and groundwater monitoring program to ensure that pre-ANGC water quality is maintained. Therefore, with the conditions placed on the golf course, it is anticipated that incidental runoff (small amounts of runoff from over-spray of sprinklers or overflow during major storm events) would be very minimal and not substantial and therefore, not considered a significant or adverse impact on the ecosystem, aquifer or the Big Tujunga Mitigation Bank.

Potential impacts on sensitive biological resources are further described in Appendix B of the IS/MND (Biological Resources Technical Memorandum).

**Comment 4:** The land use regulations in the area do not permit the construction of a 1 million gallon water tank. The Angeles Golf Course has strict requirements as part of its conditional use permit and does not include the construction of such a tank.

**Response:** No land use regulations prohibit the construction of the storage tank in the proposed location. Although the location of the storage tank has been proposed within an area slated to be offered to the Santa Monica Mountains Conservancy (SMMC) for future dedication by the ANGC (per their City of Los Angeles Conditional Use Permit), the location of the tank would not conflict with the proposed habitat preserve dedication.





NATURAL HISTORY MUSEUM  
OF LOS ANGELES COUNTY

14 April 2004

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

Re: Hansen Dam/Big Tujunga Wash Area Water Recycling Project

Dear Mr. Holloway:

I am very concerned about likely habitat impacts from the proposed use of recycled wastewater on the Angeles National Golf Course in Big Tujunga Wash, and I believe it is critical that these and other concerns be addressed through a comprehensive Environmental Impact Report (EIR) prior to the initiation of this project.

I am not competent to address water quality concerns, a variety of which arise from the proposed project. However, as a practicing ornithologist and avian ecologist in the region for over 30 years, I have serious issues with habitat impacts that will or might result from the construction of the pipeline and subsequent water storage. Specifically,

(1) The proposed staging area south of the Wheatland Exit of the 210 (Foothill) Freeway is immediately adjacent to, and will likely impact, one of only two known remaining territories of the highly endangered Cactus Wren (*Campylorhynchus brunneicapillus*) in the Big Tujunga Wash area. I observed birds at an active nest in this area in March 2004. The Cactus Wren formerly had significant colonies in the alluvial scrub of Big Tujunga Wash, but ongoing habitat destruction, culminating with the elimination of several hundred acres of habitat for the golf course, has reduced this population to a very tenuous level. At a minimum, thorough current surveys of Cactus Wrens in the entire Big Tujunga Wash area need to be conducted, and no alluvial scrub should be allowed to be impacted by the pipeline construction or staging activities. The United States Fish and Wildlife Service and California Department of Fish and Game will need to assess the situation and approve construction plans.

Mr. Kimball L. Garrett  
Page 4  
October 18, 2005

**Comment 3:** (2) Similarly, the siting of the proposed water storage tank adjacent to the golf course will destroy and/or degrade an important area of alluvial scrub habitat that was to receive protection as habitat after the construction of the Angeles National Golf Course. The construction of the golf course destroyed such a large percentage of important alluvial habitat that it is not acceptable to lose additional acreage.

**Response:** Although the location of the storage tank has been proposed within an area slated to be offered to the Santa Monica Mountains Conservancy (SMMC) for future dedication by the Angeles National Golf Club (ANGC), the location of the tank would not conflict with the proposed habitat preserve dedication. Prior to the dedication of land to the SMMC, the ANGC is expected to dedicate easements for necessary roads and utilities in the area. The proposed tank site would be dedicated by the ANGC to LADWP under a utility easement as part of this process. This dedication would not interfere with or affect the Angeles National Golf Club's ability to meet their habitat preservation obligations to the City of Los Angeles or the SMMC as specified in their Conditional Use Permit. Additionally, the placement of the tank would be in a manner that minimizes impacts to surrounding habitat by limiting construction to disturbed areas (e.g., near Conover Fire Road). Once constructed, the area surrounding the tank would be restored.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 4:** I trust that you will agree that additional environmental review is necessary before the wastewater recycling project can proceed.

**Response:** Please refer to the Response to Comment 1.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

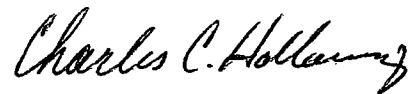
Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012



Mr. Kimball L. Garrett  
Page 5  
October 18, 2005

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez



April 13, 2004

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

Subject: Hansen Area Water Recycling Project

Dear Mr. Holloway

Thank you and Mr. Ott for attending the community meeting on April 6<sup>th</sup>. Your participation was informative but also raised many concerns.

It was mentioned several times that the water from Tillman Treatment Plant can only be used for irrigation and cannot be used to be part of ground water. I did not hear any response from you or Mr. Ott other than the plans of the future for it to be used for Hansen Dam Golf Course and surrounding parks. How is DWP going to be able to stop the treated water from contaminating ground water in the Hansen Dam area - or in any of the other areas mentioned that are above ground water.

I believe a Full Environmental Impact Report needs to be done for a project of this size and scope. The danger posed by residual medications is only now beginning to be understood. The effects on wildlife and fauna

needs to be studied, how recycled water affects habitats is of a concern in this unique area.

Clearing up Osborne and Foothill will create many equestrian hazards many horses are more sensitive to heavy equipment and will not step on metal plates

I understand the DWP's requirements to use recycled water and the need is there for mass amount of water usage. I believe there are other areas that would have less of an impact like the Lopez landfill. Therefore I am asking that a complete Environmental Impact Report be done for the Henson Dam Area

Sincerely,

Theresa Ghizzi

Theresa Ghizzi

6023 Kilompare Ave

North Hollywood, CA

91606



ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Theresa Ghezzi  
6023 Klump Avenue  
North Hollywood, CA 91600

Dear Ms. Ghezzi:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** It was mentioned several times [at the community meeting] that the water from Tillman Treatment Plant can only be used for irrigation and cannot be used to be part of groundwater. I did not hear any response from you [Mr. Holloway] or Mr. Ott other than the plans of the future for it to be used for Hansen Dam Golf Course and surrounding parks. How is the Los Angeles Department of Water and Power (LADWP) going to be able to stop the treated water from contaminating groundwater in the Hansen Dam area or in any of the other areas that are above groundwater.

**Response:** The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of recycled water by providing recycled water for landscape irrigation. To protect public health and safety, the State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of the recycled water facilities. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. Additionally, the Los Angeles Regional Water Quality Control Board implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are preserved. Recycled water proposed for distribution in this project would be required to meet the most current and applicable federal and state standards and requirements.

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

Ms. Theresa Ghezzi  
Page 2  
October 8, 2004

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment, including filtration for disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable recycled water quality standards.

The Angeles National Golf Club (ANGC), one of the proposed customers for this project, is a state of the art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their Conditional Use Permit (CUP). Per their CUP, once irrigation water has been delivered to the site, Condition 28 for operation of the golf course is triggered. Condition 28 requires monitoring of local surface water and groundwater quality before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires monitoring and mitigation of water quality and quantity concerns for Tujunga Ponds. Condition 127 states that the irrigation input of water shall be at a replacement rate only. Condition 138 says the golf course shall be designed to maximize infiltration and minimize runoff. Condition 139 requires the golf course to develop and implement a water quality monitoring program. Condition 194 requires that the golf course irrigation system be designed to minimize the number of acres receiving irrigation and be designed so non-essential turf areas would not be watered during droughts. Condition 196 requires that the irrigation system include computerized controls to avoid unnecessary watering and minimize water loss through evaporation. Condition 197 requires a landscape plan for the course that emphasizes low water consumption grasses wherever possible. And finally, Condition 198 requires that the golf course, in order to reduce the demand on the water infrastructure, investigate with LADWP the possible use of an on-site well and the possibility of connecting to the East Valley Reclamation Project pipeline for the use of recycled water.

Irrigation water use is effectively minimized at ANGC through design features, as required by the above Conditions. Modern irrigation controllers coupled with weather monitoring devices allow the golf club to precisely determine and deliver the appropriate amount of water for the drought-tolerant hybrid Bermuda grass used as the primary turf on the club's tees, fairways and roughs. This system allows computers to send a signal to satellites in the field that change irrigation run times based on current heat, wind, solar radiation and humidity. Daily monitoring of the irrigation system for distribution uniformity aids in maximizing system efficiency and minimizing excess irrigation.

Additionally, under normal operating conditions, all water being used for irrigation will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a sub-grade drainage system beneath putting greens, tees, and various areas in roughs and fairways is designed to collect and convey on site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all appropriate irrigation water quality parameters are met.

The City of Los Angeles Department of Recreation and Parks' Hansen Dam Recreation Area (HDRA), the other proposed customer for this project, uses Best Management Practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File 166080), as required by the California State Assembly Bill AB325, to ensure local water quality and reduce potential runoff.

Although water use is minimized at both of these facilities, it is assumed, and understood in the development of recycled water irrigation regulations, that some amount of water movement beyond the turf root system into the groundwater is expected. The turf root system and soil matrix would effectively filter many potential contaminants as the water percolates into the groundwater. For example, an estimated 90% of nitrogen is removed from recycled water during infiltration, and preliminary research indicates nearly complete removal of many pharmaceuticals during groundwater infiltration. The small volume of recycled water, or recycled water mixed with potable water, that is expected to pass through the turf root system to infiltrate into the groundwater from these facilities, when mixed with large existing groundwater supplies, is expected to have a minimal effect on the drinking water supply.

Compliance with existing state and federal regulations regarding recycled water and user facility conditions would ensure a less than significant impact on water quality from the irrigation water that would be delivered by the proposed project.

**Comment 2:** I believe a Full Environmental Impact Report (EIR) needs to be done for a project of this size and scope.

**Response:** The California Environmental Quality Act (CEQA) has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an Initial Study (IS). This process evaluates potential adverse project impacts to 17 environmental factors. If all

17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies a Mitigated Negative Declaration (MND). If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an EIR.

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, a MND was prepared and publicly distributed for review and comment.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 3:** The danger posed by residual medications is only now beginning to be understood.

**Response:** Please refer to the Response to Comment 1. In addition, as part of the City's detailed monitoring of its water quality, in 2001, LADWP tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including the Tillman Water Reclamation Plant. No drug residues were detected in any of the samples.

**Comment 4:** The effects on wildlife and fauna needs to be studied. How recycled water effects habitat is of a concern in this unique area.

**Response:** As described in response to Comment 1, in addition to guidelines from the local agency, construction and operation of the ANGC also includes numerous water quality measures/conditions that limit the area that would be in contact with the recycled water (e.g., away from native plant areas), as well as a surface and groundwater monitoring program that monitors water quality from the golf course. The operation of the proposed project would not have a significant impact on local habitat because: 1) the irrigation water's quality is regulated by numerous state and federal regulations; 2) there are strict monitoring requirements and procedures in place to mitigate any potential water quality concerns to surface or groundwater at the ANGC; 3) the ANGC irrigation system is designed such that recycled and potable water can be blended within the system to obtain desired water quality objectives; 4) the ANGC has been designed to minimize irrigation and to collect excess water on site for re-use in their



irrigation system; and 5) HDRA utilizes Best Management Practices (BMPs) to ensure local water quality and reduce potential runoff.

Recycled water proposed to be distributed through the project facilities would receive full tertiary treatment as specified under Title 22 and disinfection. This water would meet all current state and federal water quality criteria for recycled water supplies. Water delivered to HDRA and the ANGC would be used for irrigation of turf areas only. Beyond the use of drought-resistant grass, turf management practices, including irrigation optimization that conserves water (e.g., limiting areas to be irrigated) and evaporation would limit the area where recycled water would be used.

In addition to regulatory agency guidelines, the operation of the ANGC involves numerous water quality measures that limit the area that would be in contact with the recycled water (e.g., away from native plant areas, including known populations of slender-horned spinyflower). As previously described in the Response to Comment 1, Condition 28 requires the monitoring of local surface water and groundwater quality conditions before and during the operation of the golf course. Condition 49 addresses requirements for the "Golf Course Management Plan" including control of chemicals for water quality management. Condition 138 requires the golf course to be designed to maximize infiltration and minimize runoff. And finally, Condition 139 requires the golf course to develop and implement a water quality monitoring program.

In addition, ANGC includes preserve areas of native plants, and mitigation (Measure 40) that specifically indicates that turf areas shall be graded to direct drainage away from the preserve areas. Furthermore, Mitigation Measure 41 approved as part of the ANGC project specifically indicates that "... as designed, there should be no movement of water from the golf course to the preserve. Precisely controlled irrigation systems will minimize runoff of irrigation waters. All drainage is away from the preserve so that even during storm events no runoff should reach the preserve from the golf course area." In addition, the ANGC has an extensive surface and groundwater monitoring program to ensure that pre-ANGC water quality is maintained. Therefore, with the conditions placed on the golf course, it is anticipated that incidental runoff (small amounts of runoff from over-spray of sprinklers or overflow during major storm events) would be very minimal and not substantial and therefore, not considered a significant or adverse impact on local habitat.

Potential impacts on sensitive biological resources are further described in Appendix B of the IS/MND (Biological Resources Technical Memorandum).

**Comment 5:** Tearing up Osborne and Foothill will create many equestrian hazards many horses are noise sensitive to heavy equipment and will not step on plates.

**Response:** As described in the IS/MND, construction is expected to progress along the proposed alignment with the maximum length of open trench at one time being open of approximately 500 feet in length within a work area of up to approximately 2,000 linear feet. This type of construction would progress such that no one area would be directly affected by the construction for no more than a three-month period. Portions of the proposed alignment could disrupt equestrian activity during the short period of time that construction would take place in any one location. For the safety of people and horses, construction areas would be designated and ingress/egress limited per all applicable standard practices and LADOT requirements, thus limiting the access of horses in the construction area during the temporary construction period at any one location.

**Comment 6:** I understand LADWP's requirements to use recycled water and the need is there for mass amount of water usage. I believe there are other areas that would have less of an impact like the Lopez Landfill. Therefore, I am asking that a complete EIR be done for the Hansen Dam area.

**Response:** Lopez Canyon Landfill (LCL) is not being proposed as a customer as part of this project. Supplying recycled water to LCL would require the development of a system with sufficient hydraulic capacity to serve the water demand at adequate pressure. The HDRA and the ANGC are physically situated at elevations and locations that can be immediately served by utilizing the proposed pumping station at the Valley Generating Station (VGS) to lift the water to the proposed storage tank at a hydraulic grade of approximately 1,405 feet. Trying to use a single pump station at VGS to pump to the top of LCL would result in pressures too great for service at lower elevations such as at HDRA.

The existing pump station at LCL could be used to pump the water to Lopez Canyon Landfill if the LCL pipe system were re-designed so that irrigation water and industrial water would be completely separated from potable water uses; however, operating the LCL pump station without the proposed storage tank at ANGC would result in a system of two pump stations located in series without a storage tank. This type of system has the potential to cause cavitation of the pumps or pressure surges throughout the recycled water distribution scheme. To serve the LCL, the water would need to be pumped from the proposed storage tank to the existing LCL tank located on top of the landfill.

Ms. Theresa Ghezzi  
Page 7  
October 8, 2004

If a future project were to propose to extend a recycled water pipeline to LCL, the proposed project's pump station and storage tank would provide a system that (1) could operate at pressures which could continue to serve customers at lower elevations and (2) would have the storage capacity to help provide adequate suction pressure for the existing LCL Pump Station to operate without causing cavitation of the pumps or pressure surges. Any proposed future project would undergo an environmental evaluation as required under CEQA.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez





April 13, 2004

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

Subject: Hansen Area Water Recycling Project

Dear Mr. Holloway,

There appear to be a number of inaccuracies in the Mitigated Negative Declaration, which suggest an inadequate study of the pipe route's geography and logistics. As an example, there is a natural area just to the south of the 210 Wheatland exit, which needs to be protected. It is recommended in the Negative Dec that this area be used as a construction staging area. This would be an inappropriate site for a staging area.

While, in theory, I am supportive of recycling waste water, I strongly urge that a full EIR to be conducted to ensure that there are no serious or negative effects that would result from this proposed Water Recycling Project. Unfortunately, there is new information about health hazards in recycled wastewater, including drinking water disinfection by-products. Additionally, the high salt & boron content in recycled waste water may cause damage to native plants, trees and bushes.

Therefore, I respectfully request the need for a FULL "Environmental Impact Report" (EIR) be done for the Hansen Area (waste) Water Recycling Project.

It has been suggested that a better location for the Hansen Area Recycled wastewater project would be in the area of the Lopez Canyon Landfill. The landfill is high above the water table, lined to prevent water leakage, and provides an ideal laboratory environment in which to monitor and test the long-term results of irrigating with recycled water. Furthermore, the infrastructure to get the water up to the landfill is already in place (pumping station, pipe, 1 MG tank).

Thank you very much for your cooperation.

Sincerely,

Marlene Grossman,  
Executive Director

Cc: Tujunga Watershed Council





ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Marlene Grossman  
Pacoima Beautiful  
11243 Glenoaks Boulevard  
Suite 3  
Pacoima, CA 91331

Dear Ms. Grossman:

**Subject:** Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** Appears to be numerous inaccuracies in the Mitigated Negative Declaration which suggest an inadequate study of the pipe route's geography and logistics. As an example, there is a natural area just south of the 210 Wheatland exit, which needs to be protected. It is recommended in the Negative Dec that this area be used as a construction staging area. This would be an inappropriate site for a staging area.

**Response:** The Los Angeles Department of Water and Power (LADWP) will not utilize the I-210 Wheatland exit as a staging area. As local community members have suggested, an alternate staging area in close proximity to the proposed I-210/Wheatland exit has been proposed. This new staging area is adjacent to the Hansen Dam Sports Complex and is currently leased by Valley Crest Tree Company for tree storage. LADWP proposes to use this site instead of the I-210/Wheatland site. If this site is unavailable, then LADWP proposes to use another site in close proximity to the proposed project alignment but not the I-210/Wheatland site.

**Comment 2:** While, in theory, I am supportive of recycling waste water, I strongly urge that a full Environmental Impact Report (EIR) be conducted to ensure that there are no serious or negative effects that would result from the proposed project. Unfortunately, there is new information about health hazards in recycled wastewater, including drinking

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water disinfection by-products. Additionally, the high salt & boron content of recycled waste water may cause damage to native plants, trees, and bushes.

**Response:** Concerns about the potential human health risks associated with pharmaceuticals and pharmaceuticals and personal care products (PPCPs) entering the environment via municipal wastewater are mainly correlated with wastewater used to supplement drinking water supplies. The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of reclaimed/recycled water by providing recycled water for landscape irrigation. The State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of the recycled water facilities. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. Additionally the Los Angeles Regional Water Quality Control Board implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are protected. Recycled water proposed for distribution in this project would be required to meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment, including filtration for disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable recycled water quality standards. In fact, although the salt concentration of recycled water from the Tillman Plant is higher than that which would be provided via the LADWP potable water system, the Tillman recycled water presently meets the current drinking water standards for salt.

In addition, as part of the City's detailed monitoring of its water quality, in 2001, LADWP tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including the Tillman Water Reclamation Plant. No drug residues were detected in any of the samples.

The Angeles National Golf Club (ANGC), one of the proposed customers for this project, is a state of the art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their



Conditional Use Permit (CUP). Per their CUP, once irrigation water has been delivered to the site, Condition 28 for operation of the golf course is triggered. Condition 28 requires monitoring of local surface water and groundwater quality before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires monitoring and mitigation of water quality and quantity concerns for Tujung Ponds. Condition 127 states that the irrigation input of water shall be at a replacement rate only. Condition 138 says the golf course shall be designed to maximize infiltration and minimize runoff. Condition 139 requires the golf course to develop and implement a water quality monitoring program. Condition 194 requires that the golf course irrigation system be designed to minimize the number of acres receiving irrigation and be designed so non-essential turf areas would not be watered during droughts. Condition 196 requires that the irrigation system include computerized controls to avoid unnecessary watering and minimize water loss through evaporation. Condition 197 requires a landscape plan for the course that emphasizes low water consumption grasses wherever possible. And finally, Condition 198 requires that the golf course, in order to reduce the demand on the water infrastructure, investigate with the LADWP the possible use of an on-site well and the possibility of connecting to the East Valley Reclamation Project pipeline for the use of recycled water.

Irrigation water use is effectively minimized at ANGC through design features, as required by the above Conditions. Modern irrigation controllers coupled with weather monitoring devices allow the golf club to precisely determine and deliver the appropriate amount of water for the drought tolerant hybrid Bermuda grass used as the primary turf on the club's tees, fairways and roughs. This system allows computers to send a signal to satellites in the field that change irrigation run times based on current heat, wind, solar radiation and humidity. Daily monitoring of the irrigation system for distribution uniformity aids in maximizing system efficiency and minimizing excess irrigation.

Under normal operating conditions, all water being used for irrigation will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a sub-grade drainage system beneath putting greens, tees, and various areas in roughs and fairways is designed to collect and convey on site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all appropriate irrigation water quality parameters are met.

In addition, ANGC includes preserve areas of native plants, and mitigation (Measure. 40) that specifically indicates that turf areas shall be graded to direct drainage away from the preserve areas. Furthermore, Mitigation Measure. 41 approved

as part of the ANGC project specifically indicates that "... as designed, there should be no movement of water from the golf course to the preserve. Precisely controlled irrigation systems will minimize runoff of irrigation waters. All drainage is away from the preserve so that even during storm events no runoff should reach the preserve from the golf course area." In addition, the ANGC has an extensive surface and groundwater monitoring program to ensure that pre-ANGC water quality is maintained. Therefore, with the conditions placed on the golf course, it is anticipated that incidental runoff (small amounts of runoff from over-spray of sprinklers or overflow during major storm events) would be very minimal and not substantial and therefore, not considered a significant or adverse impact on local wildlife or habitat.

The City of Los Angeles Department of Recreation and Parks' Hansen Dam Recreation Area (HDRA), the other proposed customer for this project, uses Best Management Practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File 166080), as required by the California State Assembly Bill AB325, to ensure local water quality and reduce potential runoff.

The operation of the proposed project would not have a significant impact on local wildlife or habitat because: 1) the irrigation water's quality is regulated by numerous state and federal regulations; 2) there are strict monitoring requirements and procedures in place to mitigate any potential water quality concerns to surface or groundwater at the ANGC; 3) the ANGC irrigation system is designed such that recycled and potable water can be blended within the system to obtain desired water quality objectives; 4) the ANGC has been designed to minimize irrigation and to collect excess water on site for re-use in their irrigation system; and 5) HDRA uses BMPs to ensure local water quality and reduce potential runoff.

**Comment 3:** Therefore, I respectfully request the need for a full EIR be done for the Hansen Area (waste) Water Recycling Project.

**Response:** The California Environmental Quality Act (CEQA) has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an Initial Study (IS). This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies an MND. If the IS indicates that a proposed project may have a significant impact on the

environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an EIR.

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, a MND was prepared and publicly distributed for review.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 4:** It has been suggested that a better location for the Hansen Area Recycled wastewater project would be in the area of the Lopez Canyon Landfill. The landfill is high above the water table, lined to prevent water leakage, and provides an ideal laboratory environment in which to monitor and test the long-term results of irrigating with recycled water. Furthermore, the infrastructure to get water up to the landfill is already in place (pumping station, pipe, 1 MG tank).

**Response:** Lopez Canyon Landfill (LCL) is not being proposed as a customer as part of this project. Supplying recycled water to LCL would require the development of a system with sufficient hydraulic capacity to serve the water demand at adequate pressure. The HDRA and the ANGC are physically situated at elevations and locations that can be immediately served by utilizing the proposed pumping station at the Valley Generating Station to lift the water to the proposed storage tank at a hydraulic grade of approximately 1,405 feet. Trying to use a single pump station at Valley Generating Station to pump to the top of LCL would result in pressures too great for service at lower elevations such as at HDRA.

The existing pump station at LCL could be used to pump the water to Lopez Canyon Landfill if the LCL pipe system were re-designed so that irrigation water and industrial water would be completely separated from potable water uses; however, operating the LCL pump station without the proposed storage tank at ANGC would result in a system of two pump stations located in series without a storage tank. This type of system has the potential to cause cavitation of the pumps or pressure surges throughout the recycled water distribution scheme. To serve the LCL, the water would need to be pumped from the proposed storage tank to the existing LCL tank located on top of the landfill.

Ms. Marlene Grossman  
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October 18, 2005

If a future project were to propose to extend a recycled water pipeline to LCL, the proposed project's pump station and storage tank would provide a system that (1) could operate at pressures which could continue to serve customers at lower elevations and (2) would have the storage capacity to help provide adequate suction pressure for the existing LCL Pump Station to operate without causing cavitation of the pumps or pressure surges. Any proposed future project would undergo an environmental evaluation as required under the California Environmental Quality Act (CEQA).

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez

Terry L. Hake-Church  
9738 Commerce Ave.  
Tujunga, CA 91042  
(818) 353-4281

Los Angeles Department of Water and Power  
Environmental Affairs  
Att: Charles Holloway  
111. N. Hope St.  
Room 1044  
Los Angeles, CA 90012

April 16, 2004

**Comment Regarding Hansen Area Water Recycling Project IS/MND**

Sir,

I am a member of the Sunland-Tujunga Merchants Association. While we applaud your efforts to find ways to expand the usage of our water supply, we feel that not enough study has been given to the long-term effects of this project on the Los Angeles County drinking water spreadings grounds.

I have personally been involved with land use issues here in Sunland-Tujunga for years and helped formulate the Scenic Corridor Plan and the extensive conditions of the the Conditional Use Permit for the Angeles Golf Course. I believe the project with the tank you propose will violate conditions in both cases. William Eick elaborated these possible violations better than I can in his letter of 02/25/04. I refer you to that letter for the reasons for a request for a full EIR study.

I also agree with the Tujunga Watershed Council that the better option for this project is the Lopez Canyon Landfill. The infrastructure already exists to make this possible, resulting in both a safer and and more cost-effective location for the project.

Sincerely,



Terry L. Hake-Church





ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Terry L. Hake-Church  
9738 Commerce Avenue  
Tujunga, CA 91042

Dear Ms. Hake-Church:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to attached letter for actual comment text):

**Comment 1:** I am a member of the Sunland-Tujunga Merchants Association. While we applaud your efforts to find ways to expand the usage of our water supply, we feel that not enough study has been given to the long-term effects of this project on the Los Angeles County drinking water spreading grounds.

**Response:** The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of recycled water by providing recycled water for landscape irrigation. To protect public health and safety, the State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of the recycled water facilities. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. Additionally the Los Angeles Regional Water Quality Control Board implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are protected. Recycled water proposed for distribution in this project would be required meet the most current and applicable federal and state standards and requirements.

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Telephone: (213) 367-4211 Cable address: DEWAPOLA



Ms. Terry L. Hake-Church  
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October 18, 2005

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment, including filtration for disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable recycled water quality standards.

In addition, as part of the City's detailed monitoring of its water quality, in 2001, the Los Angeles Department of Water and Power (LADWP) tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including the Tillman Water Reclamation Plant. No drug residues were detected in any of the samples.

The Angeles National Golf Club (ANGC), one of the proposed customers for this project, is a state of the art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their Conditional Use Permit (CUP). Per their CUP, once irrigation water has been delivered to the site, Condition 28 for operation of the golf course is triggered. Condition 28 requires monitoring of local surface water and groundwater quality before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires monitoring and mitigation of water quality and quantity concerns for Tujunga Ponds. Condition 127 states that the irrigation input of water shall be at a replacement rate only. Condition 138 says the golf course shall be designed to maximize infiltration and minimize runoff. Condition 139 requires the golf course to develop and implement a water quality monitoring program. Condition 194 requires that the golf course irrigation system be designed to minimize the number of acres receiving irrigation and be designed so non-essential turf areas would not be watered during droughts. Condition 196 requires that the irrigation system include computerized controls to avoid unnecessary watering and minimize water loss through evaporation. Condition 197 requires a landscape plan for the course that emphasizes low water consumption grasses wherever possible. And finally, Condition 198 requires that the golf course, in order to reduce the demand on the water infrastructure, investigate with the LADWP the possible use of an on-site well and the possibility of connecting to the East Valley Reclamation Project pipeline for the use of recycled water.

Irrigation water use is effectively minimized at ANGC through design features, as required by the above Conditions. Modern irrigation controllers coupled with weather monitoring devices allow the golf club to precisely determine and deliver the appropriate amount of water for the drought tolerant hybrid Bermuda grass used as the primary turf



on the club's tees, fairways and roughs. This system allows computers to send a signal to satellites in the field that change irrigation run times based on current heat, wind, solar radiation and humidity. Daily monitoring of the irrigation system for distribution uniformity aids in maximizing system efficiency and minimizing excess irrigation.

Additionally, under normal operating conditions, all water being used for irrigation will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a sub-grade drainage system beneath putting greens, tees, and various areas in roughs and fairways is designed to collect and convey on site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all appropriate irrigation water quality parameters are met.

The City of Los Angeles Department of Recreation and Parks' Hansen Dam Recreation Area (HDRA), the other proposed customer for this project, uses Best Management Practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File 166080), as required by the California State Assembly Bill AB325, to ensure local water quality and reduce potential runoff.

Although water use is minimized at both of these facilities, it is assumed, and understood in the development of recycled water irrigation regulations, that some amount of water movement beyond the turf root system into the groundwater is expected. The turf root system and soil matrix would effectively filter many potential contaminants as the water percolates into the groundwater. For example, an estimated 90% of nitrogen is removed from recycled water during infiltration, and preliminary research indicates nearly complete removal of many pharmaceuticals during groundwater infiltration. The small volume of recycled water, or recycled water mixed with potable water, that is expected to pass through the turf root system to infiltrate into the groundwater from these facilities, when mixed with large existing groundwater supplies, is expected to have a minimal effect on the drinking water supply.

LADWP as the major water supplier in Los Angeles has a commitment to maintaining the reliability of the City's potable water supply which includes water from groundwater sources. As with recycled water, there are existing monitoring programs that ensure quality of the groundwater is maintained. Compliance with existing state and federal regulations regarding recycled water and user facility conditions would ensure a less than significant impact on water quality from the irrigation water that would be delivered by the proposed project.

Ms. Terry L. Hake-Church  
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**Comment 2:** I have personally been involved with land use issues here in Sunland-Tujunga for years and helped formulate the Scenic Corridor Plan and the extensive conditions of the Conditional Use Permit for the Angeles Golf Course. I believe the project with the tank you propose will violate conditions in both cases. William Eick elaborated these possible violations better than I can in his letter of 02/25/04. I refer you to that letter for the reasons for a request for a full EIR study.

**Response:** The proposed water tank would not be in violation of any of the provisions of the San Gabriel/Verdugo Mountain Scenic Preservation Specific Plan. The Specific Plan sets forth provisions for Prominent Ridgeline and Scenic Highway Corridor protection. The proposed location of the tank along the Conover Fire Road is not within a designated Prominent Ridgeline or within an area 60 vertical feet from a Prominent Ridgeline. The linear portion of the proposed project would follow portions of Foothill Boulevard designated as a Scenic Highway Corridor, but there are no provisions in the Specific Plan that prohibit construction or operation of infrastructure within the scenic corridor. Also, there would be no visual impacts of the storage tank from the scenic corridor as the corridor area provisions extend 500 feet on either side of the centerline of the roadway of each of the Scenic Highways and the proposed tank would be approximately 0.5 miles from Foothill Boulevard.

Regardless of the provisions of the Specific Plan, LADWP is committed to maintaining the current character of the proposed tank location through partial or complete burial of the proposed tank and complete site restoration at the completion of construction. The Conover Fire Road, providing access to the proposed location, would be maintained with a surface suitable for both vehicular access and a natural surface equestrian trail.

Additionally, although the location of the storage tank has been proposed within an area slated to be offered to the Santa Monica Mountains Conservancy (SMMC) for future dedication by the Angeles National Golf Club (ANGC), the location of the tank would not conflict with the proposed habitat preserve dedication. Prior to the dedication of land to the SMMC, the ANGC is expected to dedicate easements for necessary roads and utilities in the area. The proposed tank site would be dedicated by the ANGC to LADWP under a utility easement as part of this process. This dedication would not interfere with or affect the Angeles National Golf Club's ability to meet their obligations to the City of Los Angeles or the SMMC as specified in their Conditional Use Permit.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 3:** I also agree with the Tujunga Watershed Council that the better option for this project is the Lopez Canyon Landfill. The infrastructure already exists to make this possible, resulting in both a safer and more cost-effective location for the project.

**Response:** Lopez Canyon Landfill (LCL) is not being proposed as a customer as part of this project. Supplying recycled water to LCL would require the development of a system with sufficient hydraulic capacity to serve the water demand at adequate pressure. HDRA and ANGC are physically situated at elevations and locations that can be immediately served by utilizing the proposed pumping station at the Valley Generating Station to lift the water to the proposed storage tank at a hydraulic grade of approximately 1,405 feet. Trying to use a single pump station at Valley Generating Station to pump to the top of LCL would result in pressures too great for service at lower elevations such as at HDRA.

The existing pump station at LCL could be used to pump the water to Lopez Canyon Landfill if the LCL pipe system were re-designed so that irrigation water and industrial water would be completely separated from potable water uses; however, operating the LCL pump station without the proposed storage tank at ANGC would result in a system of two pump stations located in series without a storage tank. This type of system has the potential to cause cavitation of the pumps or pressure surges throughout the recycled water distribution scheme. To serve the LCL, the water would need to be pumped from the proposed storage tank to the existing LCL tank located on top of the landfill.

If a future project were to propose to extend a recycled water pipeline to LCL, the proposed project's pump station and storage tank would provide a system that (1) could operate at pressures which could continue to serve customers at lower elevations and (2) would have the storage capacity to help provide adequate suction pressure for the existing LCL Pump Station to operate without causing cavitation of the pumps or pressure surges. Any proposed future project would undergo an environmental evaluation as required under the California Environmental Quality Act (CEQA).

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Ms. Terry L. Hake-Church  
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October 18, 2005

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
c: Ms. Sarah Easley Perez

RE: Hansen Area Water Recycling Project

April 12, 2004

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

Dear Mr. Holloway:

I strongly urge you to have the Department of Water and Power prepare an environmental impact report for the proposed Hansen Area Water Recycling Project. The full impact of potentially hazardous chemicals in the recycled wastewater on human health, and on the native plants and animals in the Tujunga Ponds, and downstream from the ponds, can only be fully evaluated with an environmental impact report.

The Mitigated Negative Declaration did not begin to adequately address all of the potential impacts that this proposed project could have on the local environment and the people and animals that live downstream from the Angeles Golf Course.

Sincerely,

Mary Hanson

Mary Hanson

11508 Kamloops Street

Lake View Terrace, CA 91342-7317





ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Mary Hanson  
11508 Kamloops Street  
Lake View Terrace, CA 91342-7317

Dear Ms. Hanson:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment:** I strongly urge you to have the Los Angeles Department of Water and Power (LADWP) prepare an Environmental Impact Report (EIR) for the proposed Hansen Area Water Recycling Project. The full impact of potential hazardous chemicals in the recycled wastewater on human health, and the native plants and animals in the Tujunga Ponds, and downstream from the ponds, can only be fully evaluated with an environmental impact report.

**Response:** The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of recycled water by providing recycled water for landscape irrigation. The State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of the recycled water facilities. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. Additionally the Los Angeles Regional Water Quality Control Board implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are protected. Recycled water

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Telephone: (213) 367-4211 Cable address: DEWAPOLA

Ms. Mary Hanson  
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October 8, 2004

proposed for distribution in this project would be required meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment, including filtration for disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable recycled water quality standards. In fact, although the salt concentration of recycled water from the Tillman Plant is higher than that which would be provided via the LADWP potable water system, the Tillman recycled water presently meets the current drinking water standards for salt.

In addition, as part of the City's detailed monitoring of its water quality, in 2001, LADWP tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including the Tillman Water Reclamation Plant. No drug residues were detected in any of the samples.

The Angeles National Golf Club (ANGC), one of the proposed customers for this project, is a state of the art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their Conditional Use Permit (CUP). Per their CUP, once irrigation water has been delivered to the site, Condition 28 for operation of the golf course is triggered. Condition 28 requires monitoring of local surface water and groundwater quality before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires monitoring and mitigation of water quality and quantity concerns for Tujunga Ponds. Condition 127 states that the irrigation input of water shall be at a replacement rate only. Condition 138 says the golf course shall be designed to maximize infiltration and minimize runoff. Condition 139 requires the golf course to develop and implement a water quality monitoring program. Condition No.194 requires that the golf course irrigation system be designed to minimize the number of acres receiving irrigation and be designed so non-essential turf areas would not be watered during droughts. Condition 196 requires that the irrigation system include computerized controls to avoid unnecessary watering and minimize water loss through evaporation. Condition 197 requires a landscape plan for the course that emphasizes low water consumption grasses wherever possible. And finally, Condition 198 requires that the golf course, in order to reduce the demand on the water infrastructure, investigate with the LADWP the possible use of an on-site well and the possibility of connecting to the East Valley Reclamation Project pipeline for the use of recycled water.



Irrigation water use is effectively minimized at ANGC through design features, as required by the above Conditions. Modern irrigation controllers coupled with weather monitoring devices allow the golf club to precisely determine and deliver the appropriate amount of water for the drought-tolerant hybrid Bermuda grass used as the primary turf on the club's tees, fairways and roughs. This system allows computers to send a signal to satellites in the field that change irrigation run times based on current heat, wind, solar radiation and humidity. Daily monitoring of the irrigation system for distribution uniformity aids in maximizing system efficiency and minimizing excess irrigation.

Under normal operating conditions, all water being used for irrigation will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a sub-grade drainage system beneath putting greens, tees, and various areas in roughs and fairways is designed to collect and convey on site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all appropriate irrigation water quality parameters are met.

In addition, ANGC includes preserve areas of native plants, and mitigation (measure 40) that specifically indicates that turf areas shall be graded to direct drainage away from the preserve areas. Furthermore, Mitigation Measure 41 approved as part of the ANGC project specifically indicates that "... as designed, there should be no movement of water from the golf course to the preserve. Precisely controlled irrigation systems will minimize runoff of irrigation waters. All drainage is away from the preserve so that even during storm events no runoff should reach the preserve from the golf course area." In addition, the ANGC has an extensive surface and groundwater monitoring program to ensure that pre-ANGC water quality is maintained. Therefore, with the conditions placed on the golf course, it is anticipated that incidental runoff (small amounts of runoff from over-spray of sprinklers or overflow during major storm events) would be very minimal and not substantial and therefore, not considered a significant or adverse impact on local wildlife or habitat.

The City of Los Angeles Department of Recreation and Parks' Hansen Dam Recreation Area (HDRA), the other proposed customer for this project, uses Best Management Practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File 166080), as required by the California State Assembly Bill AB325, to ensure local water quality and reduce potential runoff.

The operation of the proposed project would not have a significant impact on local wildlife or habitat because: 1) the irrigation water's quality is regulated by numerous

Ms. Mary Hanson  
Page 4  
October 8, 2004

state and federal regulations; 2) there are strict monitoring requirements and procedures in place to mitigate any potential water quality concerns to surface or ground water at the ANGC; 3) the ANGC irrigation system is designed such that recycled and potable water can be blended within the system to obtain desired water quality objectives; 4) the ANGC has been designed to minimize irrigation and to collect excess water on site for re-use in their irrigation system; and 5) HDRA uses BMPs to ensure local water quality and reduce potential runoff. Potential impacts on sensitive biological resources are further described in Appendix B of the IS/MND (Biological Resources Technical Memorandum).

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 2:** The Mitigated Negative Declaration did not begin to adequately address all the potential impacts that the proposed project could have on the local environment and the people and animals that live downstream from the Angeles Golf Course.

**Response:** The California Environmental Quality Act (CEQA) has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an Initial Study (IS). This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies an MND. If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an EIR.

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, an MND was prepared and publicly distributed for review and comment.

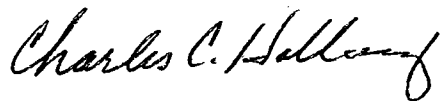
Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 18, 2005 at 1:30 p.m. The meeting location is:

Ms. Mary Hanson  
Page 5  
October 8, 2004

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez



April 12, 2004

Mr. Charles Holloway  
111 North Hope Street  
Room 1044  
Los Angeles CA 90012

Subject: Hansen Area Water Recycling Project

Dear Mr. Holloway,

Numerous inaccuracies in the project's Mitigated Negative Declaration suggest an inadequate study of the pipe route's geography and logistics. (For instance, south of the 210 Wheatland exit is a natural area that needs to be protected -- it should NOT be used for a construction staging area.)

However, even very serious safety, environmental and logistical issues associated with construction of the pipeline itself are of comparatively minor importance, compared to the much more serious issue of what will come OUT of that pipeline.

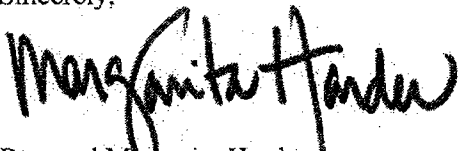
There is so much NEW knowledge about health hazards in recycled wastewater, including hundreds of DBP's (drinking water disinfection by-products) that were not even recognized as environmental hazards just a few short years ago, that any previous studies associated with the golf course's original EIR have been rendered obsolete. Additionally, the high salt & boron content in recycled wastewater may not kill turf, but it is extremely damaging for native plants, trees and bushes. And we have no idea of the effect that even trace amounts of residual medications will have on wildlife that live adjacent to the proposed irrigated areas.

Therefore, I urgently request that a FULL "Environmental Impact Report" (EIR) be done for the Hansen Area (waste) Water Recycling Project.

It would be reckless to take the unnecessary risk of pushing the Hansen Area Recycled wastewater project forward, until technology has caught up with this new awareness of the risks & hazards. For all these reasons, Lopez Landfill is a more appropriate "first customer" for this water - the landfill is high above the water table, lined to prevent water leakage, and provides an ideal laboratory environment in which to monitor and test the long-term results of irrigating with recycled water. Furthermore, the infrastructure to get the water up to the landfill is already in place (pumping station, pipe, 1 MG tank).

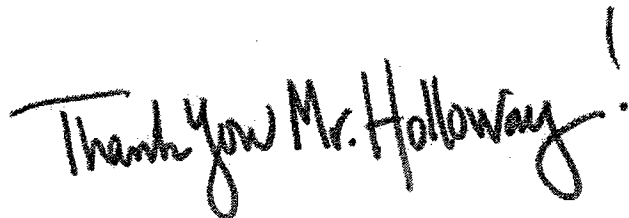
There is so much at stake in terms of both human health and environmental health -- a full E.I.R. is not unreasonable to demand.

Sincerely,



Ron and Margarita Harder  
10836 Foothill Blvd.  
Lake View Terrace, California 91342  
818.899.0080 Telephone

cc: Tujunga Watershed Council  
PO Box 176  
Sunland CA 91041







ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Mr. and Ms. Ron Harder  
10836 Foothill Boulevard  
Lake View Terrace, CA 91342

Dear Mr. and Ms. Harder:

**Subject:** Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** Numerous inaccuracies in the project's Mitigated Negative Declaration suggest an inadequate study of the pipe route's geography and logistics. (For instance, south of the 210 Wheatland exit is a natural area that needs to be protected – it should NOT be used for a construction staging area).

**Response:** The Los Angeles Department of Water and Power (LADWP) will not utilize the I-210 Wheatland exit as a staging area. As local community members have suggested, an alternate staging area in close proximity to the proposed I-210/Wheatland exit has been proposed. This new staging area is adjacent to the Hansen Dam Sports Complex and is currently leased by Valley Crest Tree Company for tree storage. LADWP proposes to use this site instead of the I-210/Wheatland site. If this site is unavailable, then LADWP proposes to use another site in close proximity to the proposed project alignment but not the I-210/Wheatland site.

**Comment 2:** However, even very serious safety, environmental and logistical issues associated with construction of the pipeline itself are of comparatively minor importance, compared to the much more serious issue of what will come OUT of that pipeline. There is so much NEW knowledge about health hazards in recycled wastewater, including hundreds of DBP's that were not even recognized as environmental hazards just a few short years ago, that any previous studies associated with the golf course's original Environmental Impact Report (EIR) have been rendered obsolete. Additionally, the high salt & boron content in recycled wastewater may not kill turf, but it is extremely damaging for native plants, trees and bushes. And we have no idea of the effect that even trace amounts of residual medications will have on wildlife that live adjacent to the proposed irrigated areas.

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Telephone: (213) 367-4211 Cable address: DEWAPOLA

**Response:** The proposed project does not rely on the golf courses EIR for any part of the environmental review process. The IS/MND for the Hansen Area Water Recycling Project satisfies the requirements for environmental evaluation under the California Environmental Quality Act (CEQA).

The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of recycled water by providing recycled water for landscape irrigation. The State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of the recycled water facilities. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. Additionally the Los Angeles Regional Water Quality Control Board implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are protected. Recycled water proposed for distribution in this project would be required meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment, including filtration for disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable recycled water quality standards. In fact, although the salt concentration of recycled water from the Tillman Plant is higher than that which would be provided via the LADWP potable water system, the Tillman recycled water presently meets the current drinking water standards for salt.

In addition, as part of the City's detailed monitoring of its water quality, in 2001, LADWP tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including the Tillman Water Reclamation Plant. No drug residues were detected in any of the samples.

The Angeles National Golf Club (ANGC), one of the proposed customers for this project, is a state of the art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their Conditional Use Permit (CUP). Per their CUP, once irrigation water has been delivered to the site, Condition 28 for operation of the golf course is triggered. Condition 28



requires monitoring of local surface water and groundwater quality before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires monitoring and mitigation of water quality and quantity concerns for Tujunga Ponds. Condition 127 states that the irrigation input of water shall be at a replacement rate only. Condition 138 says the golf course shall be designed to maximize infiltration and minimize runoff. Condition 139 requires the golf course to develop and implement a water quality monitoring program. Condition No. 194 requires that the golf course irrigation system be designed to minimize the number of acres receiving irrigation and be designed so non-essential turf areas would not be watered during droughts. Condition 196 requires that the irrigation system include computerized controls to avoid unnecessary watering and minimize water loss through evaporation. Condition 197 requires a landscape plan for the course that emphasizes low water consumption grasses wherever possible. And finally, Condition 198 requires that the golf course, in order to reduce the demand on the water infrastructure, investigate with the LADWP the possible use of an on-site well and the possibility of connecting to the East Valley Reclamation Project pipeline for the use of recycled water.

Irrigation water use is effectively minimized at ANGC through design features, as required by the above Conditions. Modern irrigation controllers coupled with weather monitoring devices allow the golf club to precisely determine and deliver the appropriate amount of water for the drought-tolerant hybrid Bermuda grass used as the primary turf on the club's tees, fairways and roughs. This system allows computers to send a signal to satellites in the field that change irrigation run times based on current heat, wind, solar radiation and humidity. Daily monitoring of the irrigation system for distribution uniformity aids in maximizing system efficiency and minimizing excess irrigation.

Under normal operating conditions, all water being used for irrigation will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a sub-grade drainage system beneath putting greens, tees, and various areas in roughs and fairways is designed to collect and convey on site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all appropriate irrigation water quality parameters are met.

In addition, ANGC includes preserve areas of native plants, and mitigation (Measure 40) that specifically indicates that turf areas shall be graded to direct drainage away from the preserve areas. Furthermore, Mitigation Measure 41 approved as part of the ANGC project specifically indicates that "... as designed, there should be no movement of water from the golf course to the preserve. Precisely controlled irrigation systems will minimize runoff of irrigation waters. All drainage is away from the preserve so that even

Mr. and Ms. Ron Harder  
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October 18, 2005

If a future project were to propose to extend a recycled water pipeline to LCL, the proposed project's pump station and storage tank would provide a system that (1) could operate at pressures which could continue to serve customers at lower elevations and (2) would have the storage capacity to help provide adequate suction pressure for the existing LCL Pump Station to operate without causing cavitation of the pumps or pressure surges. Any proposed future project would undergo an environmental evaluation as required under the California Environmental Quality Act (CEQA).

**Comment 5:** There is so much at stake in terms of both human health and environmental health – a full EIR is not unreasonable to demand.

**Response:** Please refer to the Response to Comment 5. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez

JULIE HARDING  
2522 GLEN GREEN  
HOLLYWOOD CA 90068-2310  
E-Mail: jbutterflop@yahoo.com

April 12, 2004

Charles Holloway  
111 North Hope Street  
Room 1044  
Los Angeles CA 90012

Subject: Hansen Area Water Recycling Project

Dear Mr. Holloway,

The DWP representatives recently stated at a public meeting (April 6), that their position was "no impact on the environment," regarding the proposed Hansen Area (waste) Water Recycling Project." How can that be determined without a full Environmental Impact Report!? There are recently discovered serious health concerns regarding recycled wastewater. They surely must know about the new documented health hazards of recycled wastewater. I trust that you will see that the citizens are protected from this folly of requiring only a "Mitigated Negative Declaration."

Sincerely,



Julie Harding

Cc: Tujunga Watershed Council  
PO Box 176  
Sunland CA 91041





ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Julie Harding  
2522 Glen Green  
Hollywood, CA 90068-2310

Dear Ms. Harding:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** The Los Angeles Department of Water and Power (LADWP) representatives recently stated at a public meeting (April 6), that their position was "no impact on the environment," regarding the proposed Hansen Area (waste) Water Recycling Project." How can that be determined without a full environmental impact report!?

**Response:** The California Environmental Quality Act (CEQA) has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an Initial Study (IS). This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies a Mitigated Negative Declaration (MND). If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an Environmental Impact Report (EIR).

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, a MND was prepared and publicly distributed for review and comment.

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Telephone: (213) 367-4211 Cable address: DEWAPOLA





**MEMORIAL PARK  
and  
MORTUARY** FD 963  
EXECUTIVE OFFICES AND MORTUARY  
MAILING ADDRESS  
13017 NORTH LOPEZ CANYON RD,  
SYLMAR, CALIFORNIA 91342

March 1, 2004

LADWP Environmental Affairs  
111 N. Hope Street  
Room 1044  
Los Angeles, CA 90012

Attention: Charles Holloway  
Fax#: 213 367-3582

Mr. Holloway:

We are interested in your recycled water. We use approximately 150,000 gallons per day, 365 days a year and irrigate approximately 150 acres.

If you could call me at (818) 635-1943, it would be much appreciated.

Thank you!

A handwritten signature in dark ink, appearing to read "Bobby M. Johnson".

Bobby M. Johnson

BMJ/jlo



*"naturally more beautiful"*







ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Bobby Johnson  
Glen Haven Memorial Park and Mortuary  
13017 North Lopez Canyon Road  
Sylmar, CA 91342

Dear Bobby Johnson:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment:** We are interested in your recycled water. We use approximately 150,000 gallons per day, 365 days a year and irrigate approximately 150 acres.

**Response:** The alignment of project as currently proposed would not extend to the Glen Haven Memorial Park (located at Lopez and Kagel Canyon Roads), but your interest in recycled water is noted and will be considered for future projects. In a recent phone conversation between yourself and Los Angeles Department of Water and Power (LADWP) staff, it was determined that Glen Haven Memorial Park is not located within the LADWP service area; however, it is possible that an interagency agreement in a future project could facilitate providing recycled water to your facility.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012


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

Bobby Johnson  
Page 2  
October 18, 2005

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez

April 7, 2004

Charles Holloway  
Environmental Affairs  
LA Dept. of Water and Power  
111 N. Hope Street, Room 1004  
Los Angeles, Ca., 90012

Mr. Holloway,

You will probably find few people more cognizant than I of the value of recycled water and the ever-increasing need to utilize it for needs other than human consumption thereby reducing pressure on the demand on an ever-shrinking supply of potable water. But those are the notable words: "other than human consumption." The water-table beneath the Hansen Area Water Recycling Irrigation Project target of the Angeles National Golf Course lies a mere 25 feet below the surface and, most likely even less, in rainy seasons. The Tujunga Watershed feeds the only remaining unpolluted aquifer serving the Los Angeles area. As such, I believe you can fully understand my concern knowing that the proposed recycling project may well serve to recharge this precious water source. The Tillman Treatment Plant is **not** state-of-the-art and its recycled water permit specifically states that its end-product waters may **not** come in contact with ground-waters. So, is there a potential for groundwater contamination with the Hansen Dam Area Recycling Project? Your department itself has admitted that evaluating the use of and monitoring the effects of using recycled waters is an "emerging field". That sounds like you yourselves are not totally sure of the end-result of this project years down the way. The DWP claims that the amount of recycled treated water released from the Tillman Treatment Plant that would come into contact with groundwater as a result of Angeles National Golf Course irrigation will not be significant, yet I must ask, in the absence of a thorough study in the form of an EIR how can you truly know? As such, a full EIR is surely in order. Not just one addressing the effects of laying the necessary physical infrastructure for the project, but one addressing any and all aspects of the project and any possible long-range effects of said project including those touching on any portion potentially related to the project – the Tujunga Watershed, the San Fernando Valley Aquifer, the Los Angeles River and finally the Pacific Ocean. Is it laughable to include the Pacific Ocean in this request given the minimal size of the proposed Project? It might seem like it, but this project is potentially the first step in a city-wide program and Los Angeles is a very large City – large enough to impact the Pacific Ocean if it is not respected for its limits. Other cities have discovered only too late the disastrous effects of utilizing recycled waters for irrigation of golf courses, parks, roadways, etc. US Water News Online reports that Tucson discovered residual human-excreted and sewage-disposed medications in the groundwater, something that was not even taken into consideration when developing a recycled water program. I am not laying blame, one cannot think of every event at the outset of an emerging technology. MTBE was meant to save Californians from a terrible source of pollution – and what was the horrid end-result of that program?! Before jumping in head-first into a dark and expensive pool not fully

cognizant of the depths of the waters within that pool I do feel that, at the very least, a full EIR of the Hansen Area Water Recycling Project is called for.

It has been suggested by some to consider utilizing the Lopez Canyon GRF as a pilot project. The additional infrastructure required to bring such a project on-line would cost much less given that pumping stations and holding tanks are already in place. This facility, being a closed land-fill, is for the most part lined to prevent notable leakage. What better laboratory in which to study the emerging technology of recycled water usage with minimal potential danger to residents of the City and essentially non-existent danger of facing to-date unknown tragedies that residual medication or MTBE pollution of our waters became.

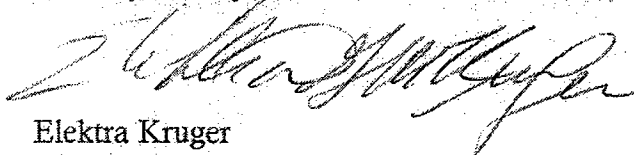
Another consideration that will bring angry residents to the forefront should the project proceed as designed is the proposed location of the 1 mil. gal. storage tank on a bluff above the north side of the golf course. The Foothill Trails District has spent over twenty years to finalize a Scenic Preservation Specific Plan that became an ordinance of the City of Los Angeles in Dec. of 2003. It is designed to protect the ever-shrinking unique and beautiful viewshed remaining in the NE corner of the City. As designed, the storage tank will glare into the vision of three distinctly designated scenic corridors. And further, how stable will such a tank be at the proposed location? Has this been adequately addressed? Perhaps a full EIR study should be required for all events potentially effecting the tank and it's selected location. And this is not even taking into account that the CUP for the Golf Course specifically set this area aside as a wildlife/native habitat.

Because the MND took into account only the construction of the physical infrastructure involved with the program, many important features have been overlooked eg.: Has the DWP ever consulted the Army Corps of Engineers or the Cal. Dept of F&G to verify whether discharging recycled water onto a golf course constructed in a riverbed from which it may well percolate into and/or run-off into jurisdictional waters will be permissible? No discussion relative to the necessary permitting process has been addressed in the MND.

Further, the MND failed to address water quality monitoring plans.

There are simply too many questions to answer, too many holes to fill before a project of this magnitude and this great a potential for long-term negative effects to proceed at this time. The first step in answering the many important questions would be a full EIR.

Thank you for your time and consideration,



Elektra Kruger  
10544 Mahoney Dr.  
Shadow Hills, Cal.  
91040-1216

Cc: Tujung Watershed



ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Elektra Kruger  
10544 Mahoney Drive  
Sunland, CA 91040

Dear Ms. Kruger:

**Subject:** Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** You will probably find few people more cognizant than I of the value of recycled water and the ever-increasing need to utilize it for needs other than human consumption thereby reducing pressure on the demand on an ever-shrinking supply of potable water. But those are the notable words: "other than human consumption." The water table beneath the Hansen Area Water Recycling Irrigation Project target of the Angeles National Golf Club lies a mere 25 feet below the surface and, most likely even less, in rainy seasons. The Tujunga Watershed feeds the only remaining unpolluted aquifer serving the Los Angeles area. My concern is that the proposed recycling project may serve to recharge this precious water source. The Tillman Treatment Plant is not state-of-the-art and its recycled water permit specifically states that its end product water may not come in contact with ground-waters.

**Response:** The proposed project would not directly discharge into any local drainage or the groundwater. The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of reclaimed/recycled water by providing recycled water for landscape irrigation. To protect public health and safety, the State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of the recycled water facilities. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. Additionally, the Los Angeles Regional Water Quality

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Ms. Elektra Kruger  
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Control Board (RWQCB) implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are protected. Recycled water proposed for distribution in this project would be required to meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment, including filtration for disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable recycled water quality standards.

The Angeles National Golf Club (ANGC), one of the proposed customers for this project, is a state of the art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their Conditional Use Permit (CUP). Per their CUP, once irrigation water has been delivered to the site, Condition 28 for operation of the golf course is triggered. Condition 28 requires monitoring of local surface water and groundwater quality before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires monitoring and mitigation of water quality and quantity concerns for Tujunga Ponds. Condition 127 states that the irrigation input of water shall be at a replacement rate only. Condition 138 says the golf course shall be designed to maximize infiltration and minimize runoff. Condition 139 requires the golf course to develop and implement a water quality monitoring program. Condition No.194 requires that the golf course irrigation system be designed to minimize the number of acres receiving irrigation and be designed so non-essential turf areas would not be watered during droughts. Condition 196 requires that the irrigation system include computerized controls to avoid unnecessary watering and minimize water loss through evaporation. Condition 197 requires a landscape plan for the course that emphasizes low water consumption grasses wherever possible. And finally, Condition 198 requires that the golf course, in order to reduce the demand on the water infrastructure, investigate with the Los Angeles Department of Water and Power (LADWP) the possible use of an on-site well and the possibility of connecting to the East Valley Reclamation Project pipeline for the use of recycled water.

Irrigation water use is effectively minimized at ANGC through design features, as required by the above Conditions. Modern irrigation controllers coupled with weather monitoring devices allow the golf club to precisely determine and deliver the appropriate amount of water for the drought-tolerant hybrid Bermuda grass used as the primary turf on the club's tees, fairways and roughs. This system allows computers to send a signal to satellites in the field that change irrigation run times based on current heat, wind, solar radiation and

Ms. Elektra Kruger  
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humidity. Daily monitoring of the irrigation system for distribution uniformity aids in maximizing system efficiency and minimizing excess irrigation.

Additionally, under normal operating conditions, all water being used for irrigation will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a sub-grade drainage system beneath putting greens, tees, and various areas in roughs and fairways is designed to collect and convey on site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all appropriate irrigation water quality parameters are met.

The City of Los Angeles Department of Recreation and Parks' Hansen Dam Recreation Area (HDRA), the other proposed customer for this project, uses Best Management Practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File 166080), as required by the California State Assembly Bill AB325, to ensure local water quality and reduce potential runoff.

Although water use is minimized at both of these facilities, it is assumed, and understood in the development of recycled water irrigation regulations, that some amount of water movement beyond the turf root system into the ground water is expected. The turf root system and soil matrix would effectively filter many potential contaminants as the water percolates into the groundwater. For example, an estimated 90% of nitrogen is removed from recycled water during infiltration, and preliminary research indicates nearly complete removal of many pharmaceuticals during groundwater infiltration. The small volume of recycled water, or recycled water mixed with potable water, that is expected to pass through the turf root system to infiltrate into the ground water from these facilities, when mixed with large existing groundwater supplies, is expected to have a minimal effect on the drinking water supply.

Compliance with existing state and federal regulations regarding recycled water and user facility conditions would ensure a less than significant impact on water quality from the irrigation water that would be delivered by the proposed project.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 2:** Is there a potential for groundwater contamination with the Hansen Dam Area Recycling Project? Your department has admitted that evaluating the use of and monitoring the effects of using recycled waters is an "emerging field." That sounds like you yourselves are not totally sure of the end-result of this project years down the way. The DWP claims that the amount of recycled treated water released from the Tillman Treatment Plant that

would come into contact with groundwater as a result of Angeles National Golf Club irrigation will not be significant, yet I must ask, in the absence of a thorough study in the form of an Environmental Impact Report (EIR) how can you truly know? As such, a full EIR is surely in order. Not just one addressing the effects of laying the infrastructure for the project, but one addressing any and all aspects of the project and any possible long-range effects of said project including those touching on any portion potentially related to the project – the Tujunga Watershed, the San Fernando Valley Aquifer, the Los Angeles River and finally the Pacific Ocean. Is it laughable to include the Pacific Ocean given the minimal size of the proposed project? It might seem like it, but this project is potentially the first step in a citywide program and Los Angeles is very large City – large enough to impact the Pacific Ocean.

**Response:** Recycled water has been used throughout the United States for over 50 years. There are existing monitoring programs that ensure quality of the recycled water and groundwater is maintained. All uses of recycled water will be in strict compliance with directives issued by state and local health agencies. As addressed in the response to Comment 1, recycled water proposed to be distributed through the project facilities will meet all state and federal water quality criteria for recycled water supplies. DHS and RWQCB set forth standards and guidelines for water quality which protect public health and ensure that water resources are not degraded. In addition, there are numerous water quality measures/conditions that limit the area that would be in contact with the recycled water (e.g., away from native plant areas), as well as a surface and groundwater monitoring program that monitors water quality from the golf course. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 3:** Other cities have discovered only too late the disastrous effects of utilizing recycled waters for irrigation of golf courses, parks, roadways, etc. US Water News Online reports that Tucson discovered residual human-excreted and sewage-disposed medications in the groundwater, something that was not even taken into consideration when developing a recycled water program. One cannot think of every event at the outset of an emerging technology. MTBE was meant to save Californians from a terrible source of pollution – and what was the horrid end-result of that program?! Before jumping head-first into a dark and expensive pool not fully cognizant of the depths of the waters within that pool I do feel that, at the very least, a full EIR of the Hansen Area Water Recycling Project is called for.

**Response:** To ensure an appropriate level of treatment for the protection of public health, the California Department of Health Services has established treatment requirements for a variety of recycled water uses (Title 22, California Code of Regulations, Section 60301 et seq.). Under Title 22 regulations, recycled water must be treated to an appropriate level to protect surface water and to prevent transmission of pathogens. Recycled water planned to be delivered through the project facilities would receive full tertiary treatment including filtration and disinfection for pathogen removal as specified under Title 22. This water will



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meet all state and federal water quality criteria for recycled water supplies. As mentioned in the response to Comment 2 above, DHS and RWQCB set forth standards and guidelines for water quality which protect public health and ensure that water resources are not degraded. New information and technologies would be addressed by these enforcement agencies. The recycled water that would be distributed by the proposed project would meet all the most current and applicable regulatory standards and requirements through permits obtained from the DHS and RWQCB.

In addition, as part of the City's detailed monitoring of its water quality, in 2001, LADWP tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including surface water, groundwater, MWD water, and recycled water sources. No drug residues were detected in any of the samples.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 4:** It has been suggested by some to consider utilizing the Lopez Canyon GRF as a pilot project. The additional infrastructure required to bring such a project on-line would cost much less given that pumping stations and holding tanks are already in place. This facility, being a closed landfill, is for the most part lined to prevent notable leakage. What better laboratory in which to study the emerging technology of recycled water usage with minimal potential danger to residents of the City and essentially non-existent danger of facing to-date unknown tragedies that residual medication or MTBE pollution of our waters became.

**Response:** Lopez Canyon Landfill (LCL) is not being proposed as a customer as part of this project. Supplying recycled water to LCL would require the development of a system with sufficient hydraulic capacity to serve the water demand at adequate pressure. The Hansen Dam Recreation Area (HDRA) and the Angeles National Golf Club (ANGC) are physically situated at elevations and locations that can be immediately served by utilizing the proposed pumping station at the Valley Generating Station to lift the water to the proposed storage tank at a hydraulic grade of approximately 1,405 feet. Trying to use a single pump station at Valley Generating Station to pump to the top of LCL would result in pressures too great for service at lower elevations such as at HDRA.

The existing pump station at LCL could be used to pump the water to Lopez Canyon Landfill if the LCL pipe system were re-designed so that irrigation water and industrial water would be completely separated from potable water uses; however, operating the LCL pump station without the proposed storage tank at ANGC would result in a system of two pump stations located in series without a storage tank. This type of system has the potential to cause cavitation of the pumps or pressure surges throughout the recycled water distribution

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scheme. To serve the LCL, the water would need to be pumped from the proposed storage tank to the existing LCL tank located on top of the landfill.

If a future project were to propose to extend a recycled water pipeline to LCL, the proposed project's pump station and storage tank would provide a system that (1) could operate at pressures which could continue to serve customers at lower elevations and (2) would have the storage capacity to help provide adequate suction pressure for the existing LCL Pump Station to operate without causing cavitation of the pumps or pressure surges. Any proposed future project would undergo an environmental evaluation as required under the California Environmental Quality Act (CEQA).

**Comment 5:** Another consideration that will bring angry residents to the forefront should the project proceed as designed is the proposed location of the 1 mil.gal. storage tank on a bluff above the north side of the golf course. The Foothill Trails District has spent over twenty years to finalize a Scenic Preservation Specific Plan that became an ordinance of the City of Los Angeles in Dec. of 2003. It is designed to protect the ever-shrinking unique and beautiful viewshed remaining in the NE corner of the City. As designed, the storage tank will glare into the vision of three distinctly designated scenic corridors.

**Response:** The proposed water tank would not be in violation of any of the provisions of the San Gabriel/Verdugo Mountain Scenic Preservation Specific Plan. The Specific Plan sets forth provisions for Prominent Ridgeline and Scenic Highway Corridor protection. The proposed location of the tank along the Conover Fire Road is not within a designated Prominent Ridgeline or within an area 60 vertical feet from a Prominent Ridgeline. The linear portion of the proposed project would follow portions of Foothill Boulevard designated as a Scenic Highway Corridor, but there are no provisions in the Specific Plan that prohibit construction or operation of infrastructure within the scenic corridor. Also, there would be no visual impacts of the storage tank from the scenic corridor as the corridor area provisions extend 500 feet on either side of the centerline of the roadway of each of the Scenic Highways and the proposed tank would be approximately 0.5 miles from Foothill Boulevard.

Regardless of the provisions of the Specific Plan, LADWP is committed to maintaining the current character of the proposed tank location through partial or complete burial of the proposed tank and site restoration at the completion of construction. The Conover Fire Road, providing access to the proposed location, would be maintained with a surface suitable for both vehicular access and a natural surface equestrian trail.

**Comment 6:** And further, how stable will such a tank be at the proposed location? Has this been adequately addressed? Perhaps a full EIR study should be required for all events potentially affecting the tank and its selected location.

Ms. Elektra Kruger  
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**Response:** Common to many areas of Southern California, the area surrounding the proposed project is characterized by faults. Construction of the proposed pipeline and storage tank would occur in accordance with all applicable seismic safety requirements and appropriate professional engineering design practices.

The likelihood of a major earthquake resulting in a catastrophic failure of the proposed water tank and instant release of a large volume of water is considered to be very low. Modern water storage tanks are designed and engineered to avoid this occurrence; slow leaks, rather than an instant release, are the expected results of tank failure.

Proposed partial or complete burial of the tank below ground would further reduce the low risk of an instant release of a large volume of water. Furthermore, the location of the Tujunga Wash between the proposed tank location and the Angeles National Golf Club would provide a buffer and further reduce the potential for tank failure to impact public safety.

**Comment 7:** And this is not even taking into account that the CUP for the Golf Course specifically set this area aside as a wildlife/native habitat.

**Response:** Although the location of the storage tank has been proposed within an area slated to be offered to the Santa Monica Mountains Conservancy (SMMC) for future dedication by the Angeles National Golf Club (ANGC), the location of the tank would not conflict with the proposed habitat preserve dedication. Prior to the dedication of land to the SMMC, the ANGC is expected to dedicate easements for necessary roads and utilities in the area. The proposed tank site would be dedicated by the ANGC to LADWP under a utility easement as part of this process. This dedication would not interfere with or affect the Angeles National Golf Club's ability to meet their obligations to the City of Los Angeles or the SMMC as specified in their Conditional Use Permit.

**Comment 8:** Because the MND took into account only the construction of the physical infrastructure involved with the program, many important features have been overlooked eg.: Has the DWP ever consulted the Army Corps of Engineers or the Cal. Dept of F&G to verify whether discharging recycled water onto a golf course constructed in a riverbed from which it may well percolate into and/or run-off into jurisdictional water will be permissible? No discussion relative to the necessary permitting process has been addressed in the MND.

**Response:** The IS/MND analyzed both the construction and operation of the proposed project. Construction and operation of the proposed project is not anticipated to impact Army Corps or California Fish and Game jurisdictional areas. Recycled water planned to be delivered through the project facilities would receive full tertiary treatment including filtration and disinfection for pathogen removal as specified under Title 22. DHS closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions

are met. A permit to use the recycled water is issued through the RWQCB. Once the recycled water is delivered to the golf course, the permit requirements (e.g., discharge permit from the RWQCB and the extensive Conditions of Approval administered by the City of Los Angeles under the Conditional Use Permit) for operation of the golf course are in place, which are separate from the proposed project.

**Comment 9:** Further, the MND failed to address water quality monitoring plans.

**Response:** As stated in the IS/MND, beginning on page 3-31, "The water that the proposed project would supply would meet all applicable water quality standards." There exists numerous health laws and water quality standards that regulate the quality of recycled water of recycled water before it even enters the distribution system, as well as construction and operation of facilities and use sites relating to recycled water. There are existing monitoring programs that ensure quality of the recycled water and groundwater is maintained. All uses of recycled water will be in strict compliance with directives issued by state and local health agencies. This includes extensive monitoring of the water before, during, and after treatment ensures continuous production of high quality reusable water. As mentioned previously, the Angeles National Golf Club has several monitoring requirements associated with the Conditional Use Permit.

**Comment 10:** There are simply too many questions to answer, too many holes to fill before a project of this magnitude and this great a potential for long-term negative effects can proceed at this time. The first step in answering the many important questions would be a full EIR.

**Response:** CEQA has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an IS. This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies a MND. If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an EIR.

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, a MND was prepared and publicly distributed for review and comment. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

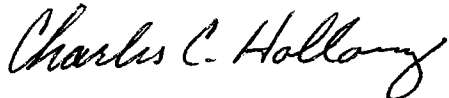
Ms. Elektra Kruger  
Page 9  
October 8, 2004

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez



Charlotte Leu  
9929 Commerce Ave.  
Tujunga, CA 91042  
(818) 353-6186

Los Angeles Department of Water and Power  
Environmental Affairs  
Att: Charles Holloway  
111. N. Hope St.  
Room 1044  
Los Angeles, CA 90012

April 16, 2004

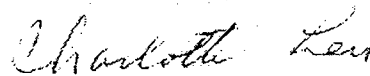
**Comment Regarding Hansen Area Water Recycling Project IS/MND**

Sir,

I am a member of the Sunland-Tujunga Merchants Association. While we applaud your efforts to find ways to expand the usage of our water supply, we feel that not enough study has been given to the long-term effects of this project on the Los Angeles County drinking water spreadings grounds. I believe that use of this water for the Angeles Golf Course will create serious potability problems for the Hansen area aquifer.

I agree with the Tujunga Watershed Council that the better option for this project is the Lopez Canyon Landfill. The infrastructure already exists to make this possible, resulting in both a safer and and more cost-effective location for the project.

Sincerely,



Charlotte Leu







ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Charlotte Leu  
9929 Commerce Avenue  
Tujunga; CA 91042

Dear Ms. Leu:

**Subject:** Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** I am a member of the Sunland-Tujunga Merchants Association. While we applaud your efforts to find ways to expand the usage of our water supply, we feel that not enough study has been given to the long-term effects of this project on the Los Angeles County drinking water spreading grounds. I believe that use of this water for the Angeles Golf Course will create serious potability problems for the Hansen area aquifer.

**Response:** The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of recycled water by providing recycled water for landscape irrigation. To protect public health and safety, the State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of the recycled water facilities. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. Additionally the Los Angeles Regional Water Quality Control Board implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are protected.

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Recyclable and made from recycled waste.



Ms. Charlotte Leu  
Page 2  
October 8, 2004

Recycled water proposed for distribution in this project would be required to meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment, including filtration and disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable water quality standards.

In addition, as part of the City's detailed monitoring of its water quality, in 2001, the Los Angeles Department of Water and Power (LADWP) tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including the Tillman Water Reclamation Plant. No drug residues were detected in any of the samples.

The Angeles National Golf Club (ANGC), one of the proposed customers for this project, is a state of the art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their Conditional Use Permit (CUP). Per their CUP, once irrigation water has been delivered to the site, Condition 28 for operation of the golf course is triggered. Condition 28 requires monitoring of local surface water and groundwater quality before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires monitoring and mitigation of water quality and quantity concerns for Tujunga Ponds. Condition 127 states that the irrigation input of water shall be at a replacement rate only. Condition 138 says the golf course shall be designed to maximize infiltration and minimize runoff. Condition 139 requires the golf course to develop and implement a water quality monitoring program. Condition 194 requires that the golf course irrigation system be designed to minimize the number of acres receiving irrigation and be designed so non-essential turf areas would not be watered during droughts. Condition 196 requires that the irrigation system include computerized controls to avoid unnecessary watering and minimize water loss through evaporation. Condition 197 requires a landscape plan for the course that emphasizes low water consumption grasses wherever possible. And finally, Condition 198 requires that the golf course, in order to reduce the demand on the water infrastructure, investigate with the LADWP the possible use of an on-site well and the possibility of connecting to the East Valley Reclamation Project pipeline for the use of recycled water.

Irrigation water use is effectively minimized at ANGC through design features, as required by the above Conditions. Modern irrigation controllers coupled with weather monitoring devices allow the golf club to precisely determine and deliver the appropriate amount of water for the drought-tolerant hybrid Bermuda grass used as the primary turf on the club's tees, fairways and roughs. This system allows computers to send a signal to satellites in the field that change irrigation run times based on current heat, wind, solar radiation and humidity. Daily monitoring of the irrigation system for distribution uniformity aids in maximizing system efficiency and minimizing excess irrigation.

Additionally, under normal operating conditions, all water being used for irrigation will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a sub-grade drainage system beneath putting greens, tees, and various areas in roughs and fairways is designed to collect and convey on site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all appropriate irrigation water quality parameters are met.

The City of Los Angeles Department of Recreation and Parks' Hansen Dam Recreation Area (HDRA), the other proposed customer for this project, uses Best Management Practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File 166080), as required by the California State Assembly Bill AB325, to ensure local water quality and reduce potential runoff.

Although water use is minimized at both of these facilities, it is assumed, and understood in the development of recycled water irrigation regulations, that some amount of water movement beyond the turf root system into the ground water is expected. The turf root system and soil matrix would effectively filter many potential contaminants as the water percolates into the groundwater. For example, an estimated 90% of nitrogen is removed from recycled water during infiltration, and preliminary research indicates nearly complete removal of many pharmaceuticals during groundwater infiltration. The small volume of recycled water, or recycled water mixed with potable water, that is expected to pass through the turf root system to infiltrate into the ground water from these facilities, when mixed with large existing groundwater supplies, is expected to have a minimal effect on the drinking water supply.

LADWP as the major water supplier in Los Angeles has a commitment to maintaining the reliability of the City's potable water supply which includes water from groundwater sources. As with recycled water, there are existing monitoring programs that ensure

quality of the groundwater is maintained. Compliance with existing state and federal regulations regarding recycled water and user facility conditions would ensure a less than significant impact on water quality from the irrigation water that would be delivered by the proposed project.

**Comment 2:** I agree with the Tujunga Watershed Council that the better option for this project is the Lopez Canyon Landfill. The infrastructure already exists to make this possible, resulting in both a safer and more cost-effective location for the project.

**Response:** Lopez Canyon Landfill (LCL) is not being proposed as a customer as part of this project. Supplying recycled water to LCL would require the development of a system with sufficient hydraulic capacity to serve the water demand at adequate pressure. The Hansen Dam Recreation Area (HDRA) and the Angeles National Golf Club (ANGC) are physically situated at elevations and locations that can be immediately served by utilizing the proposed pumping station at the Valley Generating Station to lift the water to the proposed storage tank at a hydraulic grade of approximately 1,405 feet. Trying to use a single pump station at Valley Generating Station to pump to the top of LCL would result in pressures too great for service at lower elevations such as at HDRA.

The existing pump station at LCL could be used to pump the water to Lopez Canyon Landfill if the LCL pipe system were re-designed so that irrigation water and industrial water would be completely separated from potable water uses; however, operating the LCL pump station without the proposed storage tank at ANGC would result in a system of two pump stations located in series without a storage tank. This type of system has the potential to cause cavitation of the pumps or pressure surges throughout the recycled water distribution scheme. To serve the LCL, the water would need to be pumped from the proposed storage tank to the existing LCL tank located on top of the landfill.

If a future project were to propose to extend a recycled water pipeline to LCL, the proposed project's pump station and storage tank would provide a system that (1) could operate at pressures which could continue to serve customers at lower elevations and (2) would have the storage capacity to help provide adequate suction pressure for the existing LCL Pump Station to operate without causing cavitation of the pumps or pressure surges. Any proposed future project would undergo an environmental evaluation as required under the California Environmental Quality Act (CEQA).

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

Ms. Charlotte Leu  
Page 5  
October 8, 2004

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez



LARRY MARKES  
2366 Edgewater Terrace  
Los Angeles CA 90039

April 12, 2004

Charles Holloway  
111 North Hope Street  
Room 1044  
Los Angeles CA 90012

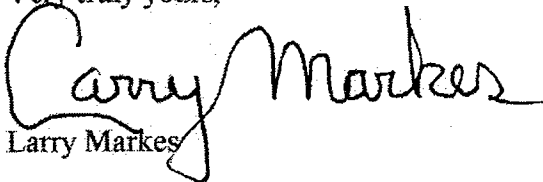
Subject: Hansen Area Water Recycling Project

Dear Mr. Holloway,

At a public meeting on April 6, representatives from the DWP (and a professional sales rep for the recycled wastewater industry) presented their position that the proposed "Hansen Area [waste] Water Recycling Project" project will have NO IMPACT on the environment and the immediately affected area. (That's why the project requires only a "Mitigated Negative Declaration" instead of a full Environmental Impact Report). For reasons cited on the Tujunga Watershed Council website, I respectfully disagree with the DWP's position. I believe that a full Environmental Impact Report needs to be done for this project, one that takes into account recently discovered serious, documented health concerns. There is so much NEW knowledge about health hazards in recycled wastewater, including hundreds of chemicals that were not even recognized as environmental hazards just a few short years ago, that any previous study on the effects of using recycled wastewater in the Tujunga Wash has been rendered obsolete.

As citizens living "downstream" from the percolate-contaminated groundwater plumes in Simi Valley or Pasadena can testify, an ounce of prevention really is worth pounds and pounds and pounds of "cure."

Very truly yours,

  
Larry Markes

Cc: Tujunga Watershed Council  
PO Box 176  
Sunland CA 91041







ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Mr. Larry Markes  
2366 Edgewater Terrace  
Los Angeles, CA 90039

Dear Mr. Markes:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to attached letter for actual comment text):

**Comment 1:** At a public meeting on April 6, representatives from DWP (and a professional sales rep for the recycled wastewater industry) presented their position that the proposed project will have NO IMPACT on the environment and the immediately affected area. (That's why the project requires only a "Mitigated Negative Declaration" instead of a full Environmental Impact Report [EIR]). For reasons cited on the Tujunga Watershed Council website, I respectively disagree with DWP's position. I believe that a full EIR needs to be done for this project, one that takes into account recently discovered serious, documented health concerns.

**Response:** The California Environmental Quality Act (CEQA) has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an Initial Study (IS). This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies a Mitigated Negative Declaration (MND). If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an Environmental Impact Report (EIR).

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and

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Mr. Larry Markes  
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October 18, 2005

noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, a MND was prepared and publicly distributed for review and comment.

**Comment 2:** There is so much NEW knowledge about health hazards in recycled wastewater, including hundreds of chemicals that were not even recognized as environmental hazards just a few short years ago, that any previous study on the effects of using recycled wastewater in the Tujunga Wash has been rendered obsolete. As citizens living "downstream" from the percolate-contaminated groundwater plumes in Simi Valley or Pasadena can testify, an ounce of prevention really is worth pounds and pounds and pounds of "cure".

**Response:** The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of recycled water by providing recycled water for landscape irrigation. To protect public health and safety, the State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of the recycled water facilities. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. Additionally the Los Angeles Regional Water Quality Control Board implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are protected. Recycled water proposed for distribution in this project would be required to meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment, including filtration for disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable recycled water quality standards.

In addition, as part of the City's detailed monitoring of its water quality, in 2001, Los Angeles Department of Water and Power (LADWP) tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including the Tillman Water Reclamation Plant. No drug residues were detected in any of the samples.

Mr. Larry Markes  
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October 18, 2005

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez



April 11, 2004

Mr. Charles Holloway  
111 North Hope St.  
Room 1044  
Los Angeles, CA 90012

Subject: Hansen Dam Water Recycling Project

Dear Mr. Holloway,

My wife and I urgently request that a FULL EIR be required before any further action is implemented. There is the very distinct possibility of irreparable environmental damage if the present plan is allowed to proceed.

A much more appropriate use of recycled water is the Lopez Landfill where no damage can be done and long-term results can be studied.

It is our hope that common sense will prevail and that human health and environmental concerns will be first and foremost all of your decisions and actions.

Thank you

*Rob Roy and Susanne McGregor*

Rob Roy and Susanne McGregor  
11619 Remington St.  
Lake View Terrace, CA 91342-6137





ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Mr. and Mrs. RobRoy McGregor  
11619 Remington Street  
Lake View Terrace, CA 91342-6137

Dear Mr. and Mrs. McGregor:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** Urgently request that a FULL EIR be required before any further action is implemented. There is the very distinct possibility of irreparable environmental damage if the present plan is allowed to proceed.

**Response:** The California Environmental Quality Act (CEQA) has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an Initial Study (IS). This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies a Mitigated Negative Declaration (MND). If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an Environmental Impact Report (EIR).

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, a MND was prepared and publicly distributed for review and comment.

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**Comment 2:** A much more appropriate use of the recycled water is the Lopez Landfill where no damage can be done and long-term results can be studied. It is our hope that common sense will prevail and that human health and environmental concerns will be first and foremost all of your decisions and actions.

**Response:** Lopez Canyon Landfill is not being proposed as a customer as part of this project. Supplying recycled water to LCL would require the development of a system with sufficient hydraulic capacity to serve the water demand at adequate pressure. The Hansen Dam Recreation Area (HDRA) and the Angeles National Golf Club (ANGC) are physically situated at elevations and locations that can be immediately served by utilizing the proposed pumping station at the Valley Generating Station to lift the water to the proposed storage tank at a hydraulic grade of approximately 1,405 feet. Trying to use a single pump station at Valley Generating Station to pump to the top of LCL would result in pressures too great for service at lower elevations such as at HDRA.

The existing pump station at LCL could be used to pump the water to Lopez Canyon Landfill if the LCL pipe system were re-designed so that irrigation water and industrial water would be completely separated from potable water uses; however, operating the LCL pump station without the proposed storage tank at ANGC would result in a system of two pump stations located in series without a storage tank. This type of system has the potential to cause cavitation of the pumps or pressure surges throughout the recycled water distribution scheme. To serve the LCL, the water would need to be pumped from the proposed storage tank to the existing LCL tank located on top of the landfill.

If a future project were to propose to extend a recycled water pipeline to LCL, the proposed project's pump station and storage tank would provide a system that (1) could operate at pressures which could continue to serve customers at lower elevations and (2) would have the storage capacity to help provide adequate suction pressure for the existing LCL Pump Station to operate without causing cavitation of the pumps or pressure surges. Any proposed future project would undergo an environmental evaluation as required under the California Environmental Quality Act (CEQA).

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

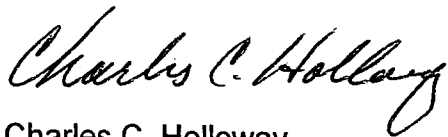


Mr. and Mrs. McGregor  
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October 18, 2005

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the Los Angeles Department of Water and Power (LADWP) website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez

Mr. Jeff O'Keefe  
Page 2  
October 18, 2005

**Response:** As the commenter correctly states, recycled water facilities (such as the proposed project and the source of the recycled water – Tillman Water Reclamation Plant), including use sites (in the case of the proposed project, the Angeles National Golf Club and Hansen Dam Recreation Area) must be constructed and operated in accordance to all applicable California laws, including, but not limited to health laws related to recycled water. The comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 4:** Please coordinate final project review and use site inspections with the Los Angeles County Department of Health Services, Cross-Connect and Water Pollution Control Program.

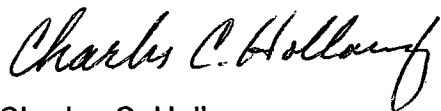
**Response:** As indicated previously, LADWP will send the plans for the recycling water pipeline to CDHS for review as is LADWP's standard practice. The comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez

April 12, 2004

Charles Holloway  
111 North Hope Street  
Room 1044  
Los Angeles CA 90012

Subject: Hansen Area Water Recycling Project

Dear Mr. Holloway,

Numerous inaccuracies in the project's Mitigated Negative Declaration suggest an inadequate study of the pipe route's geography and logistics. (For instance, south of the 210 Wheatland exit is a natural area which needs to be protected - it should NOT be used for a construction staging area.)

However, even very serious safety, environmental and logistical issues associated with construction of the pipeline itself are of comparatively minor importance, compared to the much more serious issue of what will come OUT of that pipeline.

There is so much NEW knowledge about health hazards in recycled wastewater, including hundreds of DBP's (drinking water disinfection by-products) that were not even recognized as environmental hazards just a few short years ago, that any previous studies associated with the golf course's original EIR have been rendered obsolete. Additionally, the high salt & boron content in recycled wastewater may not kill turf, but it is extremely damaging for native plants, trees and bushes. And we have no idea of the effect that even trace amounts of residual medications will have on wildlife that live adjacent to the proposed irrigated areas.

Therefore, I urgently request that a FULL "Environmental Impact Report" (EIR) be done for the Hansen Area (waste) Water Recycling Project.

It would be reckless to take the unnecessary risk of pushing the Hansen Area Recycled wastewater project forward, until technology has caught up with this new awareness of the risks & hazards. For all these reasons, Lopez Landfill is a more appropriate "first customer" for this water - the landfill is high above the water table, lined to prevent water leakage, and provides an ideal laboratory environment in which to monitor and test the long-term results of irrigating with recycled water. Furthermore, the infrastructure to get the water up to the landfill is already in place (pumping station, pipe, 1 MG tank).

There is so much at stake in terms of both human health and environmental health -- a full E.I.R. is not unreasonable to demand.

Sincerely,  
Katie Parkin  
10219 Stonehurst Ave.







ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Katie Parkin  
10219 Stonehurst Avenue  
Sun Valley, CA 91352

Dear Ms. Parkin:

**Subject:** Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** Numerous inaccuracies in the project's Mitigated Negative Declaration suggest an inadequate study of the pipe route's geography and logistics. (For instance, south of the 210 Wheatland exit is a natural area that needs to be protected – it should NOT be used for a construction staging area).

**Response:** The Los Angeles Department of Water and Power (LADWP) will not utilize the I-210 Wheatland exit as a staging area. As local community members have suggested, an alternate staging area in close proximity to the proposed I-210/Wheatland exit has been proposed. This new staging area is adjacent to the Hansen Dam Sports Complex and is currently leased by Valley Crest Tree Company for tree storage. LADWP proposes to use this site instead of the I-210/Wheatland site. If this site is unavailable, then LADWP proposes to use another site in close proximity to the proposed project alignment but not the I-210/Wheatland site.

**Comment 2:** However, even very serious safety, environmental and logistical issues associated with construction of the pipeline itself are of comparatively minor importance, compared to the much more serious issue of what will come OUT of that pipeline. There is so much NEW knowledge about health hazards in recycled wastewater, including hundreds of DBP's that were not even recognized as environmental hazards just a few short years ago, that any previous studies associated with the golf course's original Environmental Impact Report (EIR) have been rendered obsolete. Additionally, the high salt & boron content in recycled wastewater may not kill turf, but it is extremely damaging for native plants, trees, and bushes. And we have no idea of the effect that even trace amounts of residual medications will have on wildlife that live adjacent to the proposed irrigated areas.

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quality is maintained. Therefore, with the conditions placed on the golf course, it is anticipated that incidental runoff (small amounts of runoff from over-spray of sprinklers or overflow during major storm events) would be very minimal and not substantial and therefore, not considered a significant or adverse impact on local wildlife or habitat.

The City of Los Angeles Department of Recreation and Parks' Hansen Dam Recreation Area (HDRA), the other proposed customer for this project, uses Best Management Practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File 166080), as required by the California State Assembly Bill Number AB325, to ensure local water quality and reduce potential runoff.

The operation of the proposed project would not have a significant impact on local wildlife or habitat because: 1) the irrigation water's quality is regulated by numerous state and federal regulations; 2) there are strict monitoring requirements and procedures in place to mitigate any potential water quality concerns to surface or ground water at the ANGC; 3) the ANGC irrigation system is designed such that recycled and potable water can be blended within the system to obtain desired water quality objectives; 4) the ANGC has been designed to minimize irrigation and to collect excess water on site for re-use in their irrigation system; and 5) HDRA uses BMPs to ensure local water quality and reduce potential runoff. Potential impacts on sensitive biological resources are further described in Appendix B of the IS/MND (Biological Resources Technical Memorandum).

**Comment 3:** Therefore, I urgently request that a FULL EIR be done for the Hansen Area (waste) Water Recycling Project.

**Response:** The California Environmental Quality Act (CEQA) has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an IS. This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies a MND. If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an EIR.

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts

Ms. Katie Parkin  
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October 18, 2005

to less than significant. Therefore, per CEQA, a MND was prepared and publicly distributed for review and comment.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 4:** It would be reckless to take the unnecessary risk of pushing the Hansen Area Recycled wastewater project forward, until technology has caught up with this new awareness of the risks & hazards. For all these reasons, Lopez Landfill is a more appropriate "first customer" for this water – the landfill is high above the water table, lined to prevent water leakage, and provides an ideal laboratory environment in which to monitor and test the long-term results of irrigating with recycled water. Furthermore, the infrastructure to get water up to the landfill is already in place (pumping station, pipe, 1 MG tank).

**Response:** The quality of recycled water distributed through the proposed project would meet all federal and state water quality requirements.

Lopez Canyon Landfill (LCL) is not being proposed as a customer as part of this project. Supplying recycled water to LCL would require the development of a system with sufficient hydraulic capacity to serve the water demand at adequate pressure. The Hansen Dam Recreation Area (HDRA) and the Angeles National Golf Club (ANGC) are physically situated at elevations and locations that can be immediately served by utilizing the proposed pumping station at the Valley Generating Station to lift the water to the proposed storage tank at a hydraulic grade of approximately 1,405 feet. Trying to use a single pump station at Valley Generating Station to pump to the top of LCL would result in pressures too great for service at lower elevations such as at HDRA.

The existing pump station at LCL could be used to pump the water to Lopez Canyon Landfill if the LCL pipe system were re-designed so that irrigation water and industrial water would be completely separated from potable water uses; however, operating the LCL pump station without the proposed storage tank at ANGC would result in a system of two pump stations located in series without a storage tank. This type of system has the potential to cause cavitation of the pumps or pressure surges throughout the recycled water distribution scheme. To serve the LCL, the water would need to be pumped from the proposed storage tank to the existing LCL tank located on top of the landfill.

If a future project were to propose to extend a recycled water pipeline to LCL, the proposed project's pump station and storage tank would provide a system that (1) could operate at pressures which could continue to serve customers at lower elevations and (2) would have the storage capacity to help provide adequate suction pressure for the existing LCL Pump

Ms. Katie Parkin  
Page 6  
October 18, 2005

Station to operate without causing cavitation of the pumps or pressure surges. Any proposed future project would undergo an environmental evaluation as required under the California Environmental Quality Act (CEQA).

**Comment 5:** There is so much at stake in terms of both human health and environmental health – a full EIR is not unreasonable to demand.

**Response:** Please refer to the Response to Comment 5. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez



April 9, 2004

LADWP  
Environmental Affairs  
Attn: Charles Holloway  
111 N. Hope St., Room 1044  
Los Angeles, CA 90012

I am opposed to the Department of Water and Power's plans to build a six-mile-long pipeline for recycled water that would be used to irrigate the new golf course

I am particularly concerned about residual medications that are increasingly showing up in local water supplies. My concern is not only for humans, but for wild animals in the Tujunga Wash. I support local efforts to preserve this watershed and its open space. I further oppose the pipeline project as it will set a precedent for future developments in the Tujunga Wash to make further use of the proposed tank and pipeline.

I am also opposed to such a large DWP project is being devoted disproportionately to a single private business.

More questions: Was this golf course built without a plan for an adequate water supply in place?

Will the new water tank be placed on the property of its chief beneficiary, the Angeles National Golf Course. And if not, why not?

Is the Angeles National Golf Course getting a price break on this new source of water?

---

I think there needs to be more public review and more research on today's unprecedented increase in the use pharmaceuticals and new standards on the amount of this residual medication trickling down to our groundwater table at Hansen Dam.



Allen Petrinka  
9923 Hirondele Lane  
Tujunga, CA 91042





ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Mr. Allen Petrinka  
9923 Hirondele Lane  
Tujunga, CA 91042

Dear Mr. Petrinka:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** I am opposed to the Los Angeles Department of Water and Power's (LADWP) plans to build a six-mile-long pipeline for recycled water that would be used to irrigate the new golf course.

**Response:** Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 2:** I am particularly concerned about residual medications that are increasingly showing up in local water supplies. My concern is not only for humans, but for wild animals in the Tujunga Wash. I support local efforts to preserve this watershed and its open space. I further oppose the pipeline project as it will set a precedent for further developments in the Tujunga Wash to make further use of the proposed tank and pipeline.

**Response:** The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of recycled water by providing recycled water for landscape irrigation. The State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of the recycled water facilities. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and

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Telephone: (213) 367-4211 Cable address: DEWAPOLA

conditions are met. Additionally the Los Angeles Regional Water Quality Control Board implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are protected. Recycled water proposed for distribution in this project would be required meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment, including filtration for disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable recycled water quality standards. In fact, although the salt concentration of recycled water from the Tillman Plant is higher than that which would be provided via the LADWP potable water system, the Tillman recycled water presently meets the current drinking water standards for salt.

In addition, as part of the City's detailed monitoring of its water quality, in 2001, LADWP tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including the Tillman Water Reclamation Plant. No drug residues were detected in any of the samples.

The Angeles National Golf Club (ANGC), one of the proposed customers for this project, is a state of the art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their Conditional Use Permit (CUP). Per their CUP, once irrigation water has been delivered to the site, Condition 28 for operation of the golf course is triggered. Condition 28 requires monitoring of local surface water and groundwater quality before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires monitoring and mitigation of water quality and quantity concerns for Tujunga Ponds. Condition 127 states that the irrigation input of water shall be at a replacement rate only. Condition 138 says the golf course shall be designed to maximize infiltration and minimize runoff. Condition 139 requires the golf course to develop and implement a water quality monitoring program. Condition 194 requires that the golf course irrigation system be designed to minimize the number of acres receiving irrigation and be designed so non-essential turf areas would not be watered during droughts. Condition 196 requires that the irrigation system include computerized controls to avoid unnecessary watering and minimize water loss through evaporation. Condition 197 requires a landscape plan for the course that emphasizes low water consumption grasses wherever possible. And finally, Condition 198 requires

that the golf course, in order to reduce the demand on the water infrastructure, investigate with the LADWP the possible use of an on-site well and the possibility of connecting to the East Valley Reclamation Project pipeline for the use of recycled water.

Irrigation water use is effectively minimized at ANGC through design features, as required by the above Conditions. Modern irrigation controllers coupled with weather monitoring devices allow the golf club to precisely determine and deliver the appropriate amount of water for the drought-tolerant hybrid Bermuda grass used as the primary turf on the club's tees, fairways and roughs. This system allows computers to send a signal to satellites in the field that change irrigation run times based on current heat, wind, solar radiation and humidity. Daily monitoring of the irrigation system for distribution uniformity aids in maximizing system efficiency and minimizing excess irrigation.

Under normal operating conditions, all water being used for irrigation will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a sub-grade drainage system beneath putting greens, tees and various areas in roughs and fairways is designed to collect and convey on site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all appropriate irrigation water quality parameters are met.

In addition, ANGC includes preserve areas of native plants, and mitigation (measure No. 40) that specifically indicates that turf areas shall be graded to direct drainage away from the preserve areas. Furthermore, mitigation measure No. 41 approved as part of the ANGC project specifically indicates that "... as designed, there should be no movement of water from the golf course to the preserve. Precisely controlled irrigation systems will minimize runoff of irrigation waters. All drainage is away from the preserve so that even during storm events no runoff should reach the preserve from the golf course area." In addition, the ANGC has an extensive surface and groundwater monitoring program to ensure that pre-ANGC water quality is maintained. Therefore, with the conditions placed on the golf course, it is anticipated that incidental runoff (small amounts of runoff from over-spray of sprinklers or overflow during major storm events) would be very minimal and not substantial and therefore, not considered a significant or adverse impact on local wildlife or habitat.

The City of Los Angeles Department of Recreation and Parks' Hansen Dam Recreation Area (HDRA), the other proposed customer for this project, uses Best Management Practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File No. 166080), as

Mr. Allen Petrinka  
Page 4  
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required by the California State Assembly Bill AB325, to ensure local water quality and reduce potential runoff.

The operation of the proposed project would not have a significant impact on local wildlife or habitat because: 1) the irrigation water's quality is regulated by numerous state and federal regulations; 2) there are strict monitoring requirements and procedures in place to mitigate any potential water quality concerns to surface or ground water at the ANGC; 3) the ANGC irrigation system is designed such that recycled and potable water can be blended within the system to obtain desired water quality objectives; 4) the ANGC has been designed to minimize irrigation and to collect excess water on site for re-use in their irrigation system; and 5) HDRA uses BMPs to ensure local water quality and reduce potential runoff. Potential impacts on sensitive biological resources are further described in Appendix B of the IS/MND (Biological Resources Technical Memorandum).

As to your comment that the pipeline project will set a precedent for further developments in the Tujunga Wash to make further use of the proposed tank and pipeline, the proposed project is not expected to stimulate any new urban growth. LADWP is responding to legislation and the encouragement from the State of California to preserve other higher-quality water supplies for other uses. A legislatively established objective is to use recycled water in place of fresh water to assist in meeting the future water requirements of the state. The Water Code also states that the use of potable domestic water for non-potable uses, including, but not limited to, cemeteries, golf courses, parks, highway landscape areas, and industrial and irrigation uses, is a waste and unreasonable use of water if recycled water is available that meets specified conditions for its use. LADWP as the major water supplier in Los Angeles has a commitment to maintaining the reliability of the City's potable water supply. One of the ways LADWP accomplishes this is to encourage water recycling and conservation. The proposed project is part of LADWP's commitment to water recycling/conservation and would be used by permitted users (e.g., cemeteries and freeway landscaping) in close proximity to the proposed project's alignment.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 3:** I am also opposed to such a large DWP project is being devoted disproportionately to a single private business. More questions: Was this golf course built without a plan for an adequate water supply in place?

Mr. Allen Petrinka  
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October 18, 2005

**Response:** The Hansen Area Water Recycling Project (proposed project) is a public project that is proposed to service the HDRA, a public facility, as well as the ANGC a private facility open to the public. The proposed project is part of LADWP's recycling program and is proposed to distribute recycled water to users, whether public or private, that are encouraged to use recycled water in order to preserve other water supplies such as drinking water. The Environmental Impact Report (EIR) for ANGC (Los Angeles Golf Club EIR) adequately analyzed the water consumption of the construction and operation of the facility. Use of recycled water at the golf course and the Hansen Dam Recreation Area would be beneficial to the citizens of the City of Los Angeles by providing an alternative source of water for land uses that don't require potable (drinking) water.

**Comment 4:** Will the new water tank be placed on the property of its chief beneficiary, the Angeles National Golf Club. And if not, why not?

**Response:** The storage tank has been proposed within an area currently owned by the Angeles National Golf Club. The location of the proposed tank was driven by many factors, such as size of area needed, elevation (gravity is used to draw water from the tank) and location along the proposed length of alignment. All of these factors led to the conclusion that the most advantageous location was the one proposed in the IS/MND.

**Comment 5:** Is the Angeles National Golf Club getting a price break on this new source of water?

**Response:** The recycled water delivered as part of this proposed project is not a new source of water. The water is currently being discharged into the Los Angeles River near the Tillman Water Reclamation Plant, located in the Sepulveda Basin. In an attempt to encourage its use, recycled water is sold at a discounted rate as compared to the potable water. LADWP's water rate consists of various classes and the amount of the discount varies depending upon the potable water classification of the customer. In general, the discount is approximately 30%. The ANGC is expected to receive a similar discount as the HDRA.

**Comment 6:** I think there needs to be more public review and more research on today's unprecedented increase in the use of pharmaceuticals and new standards on the amount of this residual medication trickling down to our groundwater table at Hansen Dam.

**Response:** Please refer to the Response to Comment 2 regarding water quality impacts to the local groundwater. Adoption of the Mitigated Negative Declaration and

Mr. Allen Petrinka  
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October 18, 2005

consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez



August 2, 2004

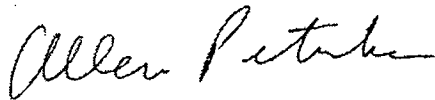
Los Angeles Department of Water and Power  
Environmental Affairs  
Attention: Charles Holloway  
111 N. Hope Street, Room 1004  
Los Angeles, California 90012

Re:Hansen Area Water Recycling Project

Dear Mr. Holloway:

I think there needs to be more public review and more research on today's unprecedented increase in the use pharmaceuticals and new standards on the amount of this residual medication trickling down to our groundwater table at Hansen Dam.

I think this project needs an environmental impact report, not a mitigated negative declaration.



Allen Petrinka  
9923 Hirondele Lane  
Tujunga, CA 91042  
declaration.





ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Mr. Allen Petrinka  
9923 Hirondele Lane  
Tujunga, CA 91042

Dear Mr. Petrinka:

**Subject:** Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** I think there needs to be more public review and more research on today's unprecedented increase in the use pharmaceuticals and new standards on the amount of this residual medication trickling down to our groundwater table at Hansen Dam.

**Response:** The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of recycled water by providing recycled water for landscape irrigation. To protect public health and safety, the State of California has specific regulations regarding use of recycled water. These regulations evolve and change over time to reflect new research and knowledge. Recycled water proposed for distribution in this project would be required to meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water receives full tertiary treatment including filtration for pathogen removal as specified under Title 22, and meets or exceeds all applicable water quality standards.

The Angeles National Golf Club (ANGC), one of the proposed customers for this project, is a state-of-the-art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their

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Conditional Use Permit (CUP). Per their CUP, once irrigation water has been delivered to the site, Condition 28 for operation of the golf course is triggered. Condition 28 requires monitoring of local surface water and groundwater quality before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires monitoring and mitigation of water quality and quantity concerns for Tujunga Ponds. Condition 127 states that the irrigation input of water shall be at a replacement rate only. Condition 138 says the golf course shall be designed to maximize infiltration and minimize runoff. Condition 139 requires the golf course to develop and implement a water quality monitoring program. Condition No. 194 requires that the golf course irrigation system be designed to minimize the number of acres receiving irrigation and be designed so non-essential turf areas would not be watered during droughts. Condition 196 requires that the irrigation system include computerized controls to avoid unnecessary watering and minimize water loss through evaporation. Condition 197 requires a landscape plan for the course that emphasizes low water consumption grasses wherever possible. And finally, Condition 198 requires that the golf course, in order to reduce the demand on the water infrastructure, investigate with the Los Angeles Department of Water and Power (LADWP) the possible use of an on-site well and the possibility of connecting to the East Valley Reclamation Project pipeline for the use of recycled water.

Irrigation water use is effectively minimized at ANGC through design features, as required by the above Conditions. Modern irrigation controllers coupled with weather monitoring devices allow the golf club to precisely determine and deliver the appropriate amount of water for the drought-tolerant hybrid Bermuda grass used as the primary turf on the club's tees, fairways and roughs. This system allows computers to send a signal to satellites in the field that change irrigation run times based on current heat, wind, solar radiation and humidity. Daily monitoring of the irrigation system for distribution uniformity aids in maximizing system efficiency and minimizing excess irrigation.

Additionally, under normal operating conditions, all water being used for irrigation will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a sub-grade drainage system beneath putting greens, tees, and various areas in roughs and fairways is designed to collect and convey on site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all appropriate irrigation water quality parameters are met.

Mr. Allen Petrinka  
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October 18, 2005

The City of Los Angeles Department of Recreation and Parks' Hansen Dam Recreation Area (HDRA), the other proposed customer for this project, uses Best Management Practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File 166080), as required by the California State Assembly Bill AB325, to ensure local water quality and reduce potential runoff.

Although water use is minimized at both of these facilities, it is assumed, and understood in the development of recycled water irrigation regulations, that some amount of water movement beyond the turf root system into the ground water is expected. The turf root system and soil matrix would effectively filter many potential contaminants as the water percolates into the groundwater. For example, an estimated 90% of nitrogen is removed from recycled water during infiltration, and preliminary research indicates nearly complete removal of many pharmaceuticals during groundwater infiltration. The small volume of recycled water, or recycled water mixed with potable water, that is expected to pass through the turf root system to infiltrate into the ground water from these facilities, when mixed with large existing groundwater supplies, is expected to have a minimal effect on the drinking water supply.

Compliance with existing state and federal regulations regarding recycled water and user facility conditions would ensure a less than significant impact on the water supply from the irrigation water that would be delivered by the proposed project.

**Comment 2:** I think the project needs an environmental impact report, not a mitigated negative declaration.

**Response:** The California Environmental Quality Act (CEQA) has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an Initial Study (IS). This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies a Mitigated Negative Declaration (MND). If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an Environmental Impact Report (EIR).

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project

Mr. Allen Petrinka  
Page 4  
October 18, 2005

construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, an MND was prepared and publicly distributed for review.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez

April 13, 2004

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

RE: Hansen Dam Water Recycling Project

Dear Mr. Holloway,

I am sending this letter to express my concern about this project going forward without a full Environmental Impact Report (EIR) being done. There are many questions that need to be answered about what will come out of this pipeline and the impact to the surrounding areas.

With all the new information currently available about recycled wastewater health hazards, any reports that were previously done by the golf course should be put aside and a new EIR should be done.

For multiple reasons I feel that Lopez Landfill should be considered as a first customer for this water. The landfill is high above the water table, lined to prevent leakage and the pumping station is already in place to get the water up to the landfill.

Sincerely,



Chris Sekulic  
10820 Jimenez St.  
Lake View Terrace, CA 91342  
Phone 818-890-2806







ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Mr. Chris Sekulic  
10820 Jimenez Street  
Lake View Terrace, CA 91342

Dear Mr. Sekulic:

**Subject:** Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** I am sending this letter to express my concern about this project going forward without a full Environmental Impact Report (EIR) being done. There are many questions that need to be answered about what will come out of this pipeline and the impact to the surrounding areas.

**Response:** The California Environmental Quality Act (CEQA) has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an Initial Study (IS). This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less than a significant impact, the Lead Agency prepares, distributes, and certifies a Mitigated Negative Declaration (MND). If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an EIR.

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the

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Mr. Chris Sekulic  
Page 2  
October 18, 2004

potential impacts to less than significant. Therefore, per CEQA, a MND was prepared and publicly distributed for review and comment.

Regarding the proposed use of recycled water for landscape irrigation, the State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of the recycled water facilities. Recycled water planned to be delivered through the project facilities would receive full tertiary treatment, including filtration for pathogen removal, as specified under Title 22. The recycled water would be required to meet the most current and applicable water quality standards. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 2:** With all the new information currently available about recycled wastewater health hazards, any reports that were previously done by the golf course should be put aside and a new EIR should be done.

**Response:** Concerns about the potential human health risks associated with pharmaceuticals and personal care products (PPCPs) entering the environment via municipal wastewater are mainly correlated with wastewater used to supplement drinking water supplies. The proposed project's objective is to improve the reliability of the City's potable water supply and expand the use of recycled water by providing recycled water for landscape irrigation. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. Additionally the Los Angeles Regional Water Quality Control Board implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are upgraded. Recycled water proposed for distribution in this project would be required meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment, including filtration for disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable recycled water quality standards.

Mr. Chris Sekulic  
Page 3  
October 18, 2004

In addition, as part of the City's detailed monitoring of its water quality, in 2001, Los Angeles Department of Water and Power (LADWP) tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including the Tillman Water Reclamation Plant. No drug residues were detected in any of the samples.

The proposed project's environmental analysis does not rely on the golf course EIR or other analysis prepared by Angeles National Golf Club. The environmental document prepared for the proposed project was an IS/MND which sufficiently addressed the potential environmental effects of the proposed project.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 3:** For multiple reasons, I feel that Lopez Landfill should be considered as a first customer for this water. The landfill is high above the water table, lined to prevent water leakage and the pumping station is already in place to get the water up to the landfill.

**Response:** Lopez Canyon Landfill (LCL) is not being proposed as a customer as part of this project. Supplying recycled water to LCL would require the development of a system with sufficient hydraulic capacity to serve the water demand at adequate pressure. The Hansen Dam Recreation Area (HDRA) and the Angeles National Golf Club (ANGC) are physically situated at elevations and locations that can be immediately served by utilizing the proposed pumping station at the Valley Generating Station to lift the water to the proposed storage tank at a hydraulic grade of approximately 1,405 feet. Trying to use a single pump station at Valley Generating Station to pump to the top of LCL would result in pressures too great for service at lower elevations such as at HDRA.

The existing pump station at LCL could be used to pump the water to Lopez Canyon Landfill if the LCL pipe system were re-designed so that irrigation water and industrial water would be completely separated from potable water uses; however, operating the LCL pump station without the proposed storage tank at ANGC would result in a system of two pump stations located in series without a storage tank. This type of system has the potential to cause cavitation of the pumps or pressure surges throughout the recycled water distribution scheme. To serve the LCL, the water would need to be pumped from the proposed storage tank to the existing LCL tank located on top of the landfill.

Mr. Chris Sekulic  
Page 4  
October 18, 2004

If a future project were to propose to extend a recycled water pipeline to LCL, the proposed project's pump station and storage tank would provide a system that (1) could operate at pressures which could continue to serve customers at lower elevations and (2) would have the storage capacity to help provide adequate suction pressure for the existing LCL Pump Station to operate without causing cavitation of the pumps or pressure surges. Any proposed future project would undergo an environmental evaluation as required under the California Environmental Quality Act (CEQA).

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez

recycled water Hansen Dam

Barbara Tarnowski  
10410 Las Lunitas Ave.  
Tujunga, CA 91042-1841

April 15th, 2004

Charles Holloway  
111 North Hope Street  
Room 1044  
Los Angeles CA 90012

Subject: Hansen Area Water Recycling Project

Dear Mr. Holloway,

Thank you for your time!

I respectfully demand that a FULL "Environmental Impact Report" (EIR) be done for the Hansen Area (waste) Water Recycling Project.

The 207 acre parcel of land that is bordered on the north by the 210 Freeway and on the south by Wentworth St. is a Mitigation Bank site. The Mitigation Bank site is critical native habitat for the following STATE ENDANGERED SPECIES and therefore are protected under the CESA (California Endangered Species Act) !!!

- 1) willow Flycatcher (43) SE
- 2) # (43) = state listing includes all subspecies SE
- 3) Least Bell's Vireo SE
- 4) Slender-horned spinesflower SE

Under the new guidelines the CESA applies to all State, County, and/or Private agencies/organizations and other without exceptions. I believe this includes DWP. Pls. see the following sections I have copied which state that a full EIR is required by law. CESA IN ORDER TO NEGOTIATE ARE ALL LOWE D.!!!! (last paragraph)

On September 28, 1997, Governor Pete Wilson signed Senate Bill 879 into California law. Many people are still not aware of the strict new protections CESA now requires for California listed species

CESA prohibits the "take" (killing or harming) of California-listed species in most circumstances. SB 879 gave the California Department of Fish and Game (Department) the authority to issue "incidental take permits" which allow take of listed species under limited conditions. SB 879 defined new standards and procedures for the Department to use in approving incidental take permit applications.

#### Key Elements of the New CESA

Applicants must meet several new standards before the Department can issue an incidental take permit.

Impacts from Taking Listed Species must be "Minimized and Fully Mitigated".

This standard (CESA Sec. 2081(b)) is significantly stronger than that in the California Environmental Quality Act (CEQA). Full mitigation means that no net impacts to listed species may occur under CESA. CESA defines "impacts" that must be minimized and fully mitigated as "all impacts on the species that result from any act that would cause the proposed taking" (CESA Sec. 2081(b)(2)). This broad definition can be read to include indirect and cumulative impacts, as well as impacts to habitat.

No Exceptions to Full Mitigation Requirement

recycled water Hansen Dam

"Overriding Considerations" are not Allowed Unlike CEQA, CESA does not allow the Department or any other public agency to use a statement of override to permit unavoidable and/or unmitigated impacts to listed species.

Applicant must Fund both Implementation and Monitoring of Mitigation

CESA Sec. 2081 (b)(4) requires that the applicant "ensure adequate funding to implement the [mitigation] measures required [under the permit]..., and for monitoring compliance with, and effectiveness of, those measures." Applicants must thus fund both implementation of required mitigation measures and effectiveness monitoring for such mitigation.

Jeopardy Standard


Section 2081 (c) prohibits issuance of any incidental take permit if "issuance of the permit would jeopardize the continued existence of the species." The Department is required to find that projects will not put species at risk of extinction based on "best scientific and other information that is reasonably available" regarding "(1) known population trends; (2) known threats to the species; and (3) reasonably foreseeable impacts on the species from other related projects and activities. Example for related projects :The gulf course itself (that would be using the treated recycled water for contamination of the spreading grounds ground water system a.k.a. "irrigation")

NOTE:

Any project involving an incidental take permit requires an Environmental Impact Report (EIR) (rather than a simple or mitigated negative declaration) under current regulation. Section 15065 (a) of the CEQA Guidelines requires that any project which "has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish and wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare or threatened species may have a significant effect on the environment and thereby requires the preparation of an EIR.

Thank you for your time and consideration of this matter.

Barbara Tarnowski

A handwritten signature in cursive script that reads "Barbara Tarnowski". The signature is written in black ink and is positioned below the typed name.



ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Barbara Tarnowski  
10410 Las Lunitas Avenue  
Tujunga, CA 91042-1841

Dear Ms. Tarnowski:

**Subject:** Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to enclosed letter for actual comment text):

**Comment 1:** Respectively demand that a full Environmental Impact Report be done for the Hansen Area (waste) Water Recycling Project.

**Response:** Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 2:** The 207 acre parcel of land that is bordered on the north by the 210 Freeway and on the south by Wentworth St. is a Mitigation Bank Site. The site is critical native habitat for STATE ENDANGERED SPECIES (e.g., Willow Flycatcher, #43, Least Bell's vireo, Slender-horned Spineflower) and therefore are protected under the California Endangered Species Act (CESA). Under the new guidelines the CESA applies to all state, County, and or Private agencies/organizations and other without exceptions. I believe this includes the Los Angeles Department of Water and Power (LADWP). Pls. See the following sections I have copied which state that a full Environmental Impact Report (EIR) is required by law. NO NEG DEC. ARE ALLOWED !!! (last paragraph).

**Response:** The proposed project would not impact the County's Habitat Mitigation Bank. LADWP will not utilize the I-210 Wheatland exit adjacent to the Mitigation Bank as a staging area. As local community members have suggested, an alternate staging area in close proximity to the proposed I-210/Wheatland exit has been proposed. This new

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staging area is adjacent to the Hansen Dam Sports Complex and is currently leased by Valley Crest Tree Company for tree storage. LADWP proposes to use this site instead of the I-210/Wheatland site. If this site is unavailable, then LADWP proposes to use another site in close proximity to the proposed project alignment but not the I-210/Wheatland site.

In Section 3.0, Discussion of Environmental Impacts and Mitigation Measures, IV. Biological Resources, of the IS/MND starting on page 3-16, the potential environmental impacts of the construction and operation of the proposed project on biological resources is adequately addressed. As stated in IV. Biological Resources, a detailed biological resources technical memorandum was prepared and included as Appendix B of the IS/MND. Appendix B provides details of the survey methods, survey results with a focus on vegetation types, wildlife populations and movement patterns (wildlife corridors), special status vegetation types, plant and wildlife species either known or potentially occurring within the area potentially affected by the proposed project, and an analysis of impacts associated with the construction and operation of the project.

Appendix B determined that fourteen (14) special status plant species and fourteen (14) special status wildlife species have been previously identified in the project region, or have some potential to occur in the project area. Because the areas proposed for construction and operation are areas historically or currently disturbed, none of these plant/wildlife species were determined to be expected to occur. In areas of construction and operation where potential habitat exists (e.g., proposed tank site), the proposed project footprint would be placed to avoid the areas with potential to support these species, therefore, no significant impacts to sensitive species are anticipated to occur. Specifically in regards to the slender-horned spinyflower, southwestern willow flycatcher, and least Bell's vireo, these species are not expected to occur within the project footprint due to the lack of suitable habitat in these areas.

**Comment 3:** On September 28, 1997, Governor Wilson signed Senate Bill 879 into California law. Many people are still not aware of the strict new protections CESA now requires for California listed species. CESA protects the "take" (killing or harming) of California-listed species in most circumstances. SB 879 gave the California Department of Fish and Game (Department) the authority to issue "incidental take permits" which allow take of listed species under limited conditions. SB 879 defined new standards and procedures for the Department to use in approving incidental take permit applications.

Key elements of the New CESA: 1) Applicants must meet several new standards before the Department can issue an incidental take permit; 2) Impacts from taking listed species must be "minimized and fully mitigated". This standard (CESA Sec. 2081(b)) is



Ms. Barbara Tarnowski  
Page 3  
October 18, 2004

significantly stronger than that in CEQA. Full mitigation means that no net impacts to listed species may occur under CESA. CESA defines "impacts" that must be minimized and fully mitigated as "all impacts on the species that result from any proposed taking" (CESA Sec. 2081(b)(2)). This broad definition can be read to include indirect and cumulative impacts, as well as impacts to habitat. No exception to full mitigation requirement. "Overriding Considerations" are not allowed unlike CEQA, CESA does not allow the Department or any other public agency to use a statement of override to permit unavoidable and/or unmitigated impacts to listed species.

**Response:** Construction and operation of the proposed project is not anticipated to directly impact resources under the jurisdiction of (1) the U.S. Fish and Wildlife (USFWS) pursuant to the federal Endangered Species Act or (2) the California Department of Fish and Game pursuant to the state Fish and Game Code and/or state Endangered Species Act. Because there is no anticipated impact on a state or federally listed Threatened or Endangered species, approval to impact (take) is not required from either the CDFG and/or USFWS.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 4:** Applicant must fund both implementation and monitoring of mitigation. CESA Sec. 2081 (b)(4) requires that the applicant "ensure adequate funding to implement the [mitigation] measures required [under the permit]...., and for monitoring compliance with, and effectiveness of, those measures." Applicants must thus fund both implementation of required mitigation measures and effectiveness monitoring for such mitigation.

**Response:** The proposed project is not anticipated to require any permits from the CDFG pursuant to the state Endangered Species Act. Therefore, the project applicant would not be required to "fund both implementation of required mitigation measures and effectiveness monitoring for such mitigation." As seen in the Final MND's correction and additions, LADWP will utilize biological monitors to determine the extent of native habitat adjacent to the project site and flag the boundaries of these areas to be avoided during construction. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

**Comment 5:** Jeopardy Standard. Section 2081 9c) prohibits issuance of any incidental take permit if "issuance of the permit would jeopardize the continued existence of the species." The Department is required to find that projects will not put species at risk of extinction based on "best scientific and other information that is reasonably available"

regarding (1) known population trends; (2) known threats to the species; and (3) reasonably foreseeable impacts on the species from other related projects and activities. Example for related projects: the golf course itself that would be using the treated recycled water for contamination of the spreading grounds ground water system a.k.a. "irrigation".

**Response:** The proposed project is not anticipated to jeopardize the continued existence of any listed plant or wildlife species; therefore, the project is not anticipated to require any permits from the CDFG pursuant to the state Endangered Species Act.

Regarding related projects, such as the use of the reclaimed water for golf course use, irrigation with recycled water would not have a significant impact on local wildlife or habitat because: 1) the irrigation water's quality is regulated by numerous state and federal regulations; 2) there are strict monitoring requirements and procedures in place to mitigate any potential water quality concerns to surface or ground water at the Angeles National Golf Course (ANGC), one of the proposed customers for this project; 3) the ANGC irrigation system is designed such that recycled and potable water can be blended within the system to obtain desired water quality objectives; 4) the ANGC has been designed to minimize irrigation and to collect excess water on site for re-use in their irrigation system; and 5) Hanson Dam Recreation Area, the other proposed customer, uses Best Management Practices (BMPs) to ensure local water quality and reduce potential runoff.

**Comment 6:** Note: Any project involving an incidental take permit requires an EIR (rather than a simple or mitigated negative declaration) under current regulation. Section 15065 (a) of the CEQA Guidelines requires that any project which "has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish and wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare or threatened species may have a significant effect on the environment and thereby requires the preparation of an EIR.

**Response:** As shown in Section 3.0, Discussion of Environmental Impacts and Mitigation Measures, IV. Biological Resources, of the IS/MND starting on page 3-16, the potential environmental impacts of the construction and operation of the proposed project on biological resources would not be significant. In addition, the proposed project would not require an incidental take permit. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision-makers.

Ms. Barbara Tarnowski  
Page 5  
October 18, 2004

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez



Charles Holloway  
111 N. Hope Street  
Room 1044, LA, CA 90012

Hansen Area Waste Water Recycling Program

April 11, 2004

Dear Mr. Holloway -

I am a member of the Injunga Watershed Council, whose goal is to preserve, and to educate the public about the need to preserve, this unique and delicate ecosystem. It is very evident that a council like this is necessary. In the two years since I have kept my horse in this area and ridden the foothill trails, there has been much development: the hills have been chopped up to build enormous homes, a large church was constructed, and a golf course was built in an actual active wash! All of this has directly impacted both the trails and the environs.

However, it is this latest project that is the subject of widespread concern: the Hansen area waste water recycling program.

While I appreciate your and the DWP's efforts to meet with the public and answer questions, I must respectfully and firmly disagree with your position that this project will have no negative impact on the flora and fauna in this ecosystem, and the watershed beneath it. The fact that the Mitigated Negative Declaration that was published described only the impact of the laying of the pipe itself belies the fact that the true impact on the watershed and its environs has

has not been properly considered let alone examined.

We therefore urge you to read the research and evidence on our website regarding the likely (not simply potential) hazardous impact this project will have - from disruption of native species because of non-native plant introduction and irrigation in a desert environment, to the leaching of hormones, steroids, salts, chemicals, antibiotics and pesticides into the ground water. It happened at an identical project in Tucson - how can we possibly believe it won't happen here?

Please admit that we simply do not know enough and that a full Environmental Impact Report is warranted.

Christine Whitaker  
11204 Peachgrove St. #4  
No Hollywood, CA 91601



ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Christine Whitakes  
11204 Peachgrove Street #4  
North Hollywood, CA 91601

Dear Ms. Whitakes:

**Subject:** Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments (paraphrased) and a response to your comments are provided as follows (please refer to attached letter for actual comment text):

**Comment 1:** I am a member of the Tujunga Watershed Council, whose goal is to preserve, and to educate the public about the need to preserve this unique and delicate ecosystem. It is very evident that a council like this is necessary. In the two years since I have kept my horse in this area and ridden the foothill trails, there has been much development: the hills have been chopped up to build enormous homes, a large church was constructed, and a golf course was built in an actual active wash! All of this has directly impacted both the trails and the environs. However it is the latest project that is subject of widespread concern: the Hansen area waste water recycling program. While I appreciate Los Angeles Department of Water and Power (LADWP)'s efforts to meet with the public and answer questions, I must respectfully and firmly disagree with your position that this project will have no negative impact on the flora and fauna in this ecosystem, and the watershed beneath it. The fact that the Mitigated Negative Declaration that was published described only the impact of the laying of the pipe itself belies the fact that the true impact on the watershed and its environs has not been properly considered let alone examined.

**Response:** The IS/MND analyzed the construction AND operation of the proposed project. As stated in the IS/MND, beginning on page 3-31, "The water that the proposed project would supply would meet all applicable water quality standards." Regarding the commenter's claim that the IS/MND does not treat the ramifications of the end product (recycled water) as part of the equation, there are numerous health laws and water quality standards that regulate the quality of recycled water before it even enters the distribution system, as well as construction and operation of facilities and use sites relating to recycled water. In California, these laws comprise sections of the Health and

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Ms. Christine Whitakes  
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Safety Code, Water Code, and California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. As stated in Title 22 regulations, recycled water that meets standards as stated in Section 60304 can be used for surface irrigation of such uses as food crops, parks, playgrounds, school yards, residential and freeway landscaping, golf courses, and cemeteries, just to name a few. The recycled water proposed to be distributed through the project facilities will meet all state and federal water quality criteria for recycled water supplies. The State Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. In addition to DHS' strict requirements, requirements of the permitting agency, the California Regional Water Quality Control Board (RWQCB), must also be met. Therefore, as concluded in the IS/MND, no significant impacts to water quality are expected from the construction or operation of the proposed project and no mitigation is required. Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

**Comment 2:** We therefore urge you to read the research and evidence on our website regarding the likely (not simply potential) hazardous impact this project will have – from disruption of native species because of non-native plant introduction and irrigation in a desert environment, to the leaching of hormones, steroids, salts, chemicals, antibiotics and pesticides into the ground water. It happened at an identical project in Tucson – how can we possibly believe it won't happen here?

**Response:** The objectives of the proposed project, as stated on page 1-4 of the IS/MND, would use already produced recycled water from Tillman Water Reclamation Plant for irrigation at the Angeles National Golf Club (ANGC) and Hansen Dam Recreation Area (HDRA) in order to free up potable (drinking) water that is currently being used for irrigation of these facilities. The purpose and need of the proposed project does not include groundwater recharge.

Concerns about the potential human health risks associated with pharmaceuticals and personal care products (PPCPs) entering the environment via municipal wastewater are mainly correlated with wastewater used to supplement drinking water supplies or water sources that receive wastewater treated effluent. The water supply for this project would receive tertiary treatment and will be used for landscape irrigation purposes, not supplement urban water supplies. Since the water for this project is not intended for direct human consumption, any potential risks that are associated with drinking water do not apply for this project. Research shows that several classes of pharmaceuticals exist in the environment for short periods of time and their concentrations fall between a range of parts per billion to parts per trillion; under these considerations, they may not



pose a significant acute risk. Current research indicates that PPCPs occur at such low concentrations in the environment, that their effects on ecological or human health may be minimal.

To protect public health and safety, the State of California has specific regulations regarding use of recycled water. These laws comprise sections of the State Health and Safety Code, Water Code, and the California Code of Regulations (CCR). CCR, Title 22, Sections 60301 through 60355 contain the Water Recycling Criteria. Section 60310 specifies requirements for recycled water use. Section 60329 addresses Operating Records and Reports with specific procedures specified during operation of the recycled water facilities. The State of California Department of Health Services (DHS) closely monitors the testing and operations of recycled water facilities to assure all regulations and conditions are met. Additionally the Los Angeles Regional Water Quality Control Board implements permitting and regulatory programs that ensure that the beneficial uses provided by local water resources are protected. Recycled water proposed for distribution in this project would be required to meet the most current and applicable federal and state standards and requirements.

The City of Los Angeles Department of Public Works' Donald C. Tillman Water Reclamation Plant would provide the recycled water for use in this proposed project. This water would receive full tertiary treatment, including filtration for disinfection for pathogen removal as specified under Title 22, and would meet or exceed all applicable recycled water quality standards.

In addition, as part of the City's detailed monitoring of its water quality, in 2001, LADWP tested for drug residuals from human use in discharges from sewage treatment plants and veterinary use in agricultural runoff in seven locations including the Tillman Water Reclamation Plant. No drug residues were detected in any of the samples.

ANGC is a state of the art facility constructed with numerous safeguards and provisions to protect local water quality from the impacts of golf course operations as mandated by the City of Los Angeles through required conditions stipulated in their Conditional Use Permit (CUP). Per their CUP, once irrigation water has been delivered to the site, Condition 28 for operation of the golf course is triggered. Condition 28 requires monitoring of local surface water and groundwater quality before and during the operation of the golf course. In addition, Condition 49 requires a "Golf Course Management Plan" including details regarding the control of chemicals for water quality management. Condition 69 requires monitoring and mitigation of water quality and quantity concerns for Tujunga Ponds. Condition 127 states that the irrigation input of water shall be at a replacement rate only. Condition 138 says the golf course shall be

designed to maximize infiltration and minimize runoff. Condition 139 requires the golf course to develop and implement a water quality monitoring program. Condition 194 requires that the golf course irrigation system be designed to minimize the number of acres receiving irrigation and be designed so non-essential turf areas would not be watered during droughts. Condition 196 requires that the irrigation system include computerized controls to avoid unnecessary watering and minimize water loss through evaporation. Condition 197 requires a landscape plan for the course that emphasizes low water consumption grasses wherever possible. And finally, Condition 198 requires that the golf course, in order to reduce the demand on the water infrastructure, investigate with the LADWP the possible use of an on-site well and the possibility of connecting to the East Valley Reclamation Project pipeline for the use of recycled water.

Irrigation water use is effectively minimized at ANGC through design features, as required by the above Conditions. Modern irrigation controllers coupled with weather monitoring devices allow the golf club to precisely determine and deliver the appropriate amount of water for the drought-tolerant hybrid Bermuda grass used as the primary turf on the club's tees, fairways and roughs. This system allows computers to send a signal to satellites in the field that change irrigation run times based on current heat, wind, solar radiation and humidity. Daily monitoring of the irrigation system for distribution uniformity aids in maximizing system efficiency and minimizing excess irrigation.

Additionally, under normal operating conditions, all water being used for irrigation will be held on the property by design. The property is graded to drain to the lowest area on the site where a lake captures most surface runoff. In addition, a sub-grade drainage system beneath putting greens, tees, and various areas in roughs and fairways is designed to collect and convey on site water to the storage lake. The water in this lake, which serves as the source for the Club's irrigation system, can be tested and blended with recycled and/or potable water to ensure that all appropriate irrigation water quality parameters are met.

The City of Los Angeles Department of Recreation and Parks' HDRA facility uses Best Management Practices (BMPs) in the maintenance and operation of the facility. These BMPs are in accordance with guidelines established by the City Council (File 166080), as required by the California State Assembly Bill Number AB325, to ensure local water quality and reduce potential runoff.

Although water use is minimized at both of these facilities, it is assumed, and understood in the development of recycled water irrigation regulations, that some amount of water movement beyond the turf root system into the ground water is expected. The turf root system and soil matrix would effectively filter many potential

contaminants as the water percolates into the groundwater. For example, an estimated 90% of nitrogen is removed from recycled water during infiltration, and preliminary research indicates nearly complete removal of many pharmaceuticals during groundwater infiltration. The small volume of recycled water, or recycled water mixed with potable water, that is expected to pass through the turf root system to infiltrate into the ground water from these facilities, when mixed with large existing groundwater supplies, is expected to have a minimal effect on the drinking water supply.

In addition, ANGC includes preserve areas of native plants, and mitigation (Measure 40) that specifically indicates that turf areas shall be graded to direct drainage away from the preserve areas. Furthermore, Mitigation Measure 41 approved as part of the ANGC project specifically indicates that "... as designed, there should be no movement of water from the golf course to the preserve. Precisely controlled irrigation systems will minimize runoff of irrigation waters. All drainage is away from the preserve so that even during storm events no runoff should reach the preserve from the golf course area." In addition, the ANGC has an extensive surface and groundwater monitoring program to ensure that pre-ANGC water quality is maintained. Therefore, with the conditions placed on the golf course, it is anticipated that incidental runoff (small amounts of runoff from over-spray of sprinklers or overflow during major storm events) would be very minimal and not substantial and therefore, not considered a significant or adverse impact on the ecosystem or aquifer.

No disruption of native species because of non-native plant introduction is expected as a result of the proposed project. No non-native plants are proposed for use in the project, and any habitat areas disturbed by the proposed project (such as the storage tank site) would be revegetated at the completion of construction with local native species.

Compliance with existing state and federal regulations regarding recycled water and user facility conditions would ensure a less than significant impact on water quality from the irrigation water that would be delivered by the proposed project.

**Comment 3:** Please admit that we simply do not know enough and that a full Environmental Impact Report (EIR) is warranted.

**Response:** The California Environmental Quality Act (CEQA) has guidelines that a Lead Agency follows during the environmental impact evaluation and documentation process for proposed projects. If a proposed project is not statutorily or categorically exempt from CEQA, the Lead Agency conducts and prepares an IS. This process evaluates potential adverse project impacts to 17 environmental factors. If all 17 environmental factors result in a less than significant impact or can be mitigated to less

Ms. Christine Whitakes  
Page 6  
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than a significant impact, the Lead Agency prepares, distributes, and certifies an MND. If the IS indicates that a proposed project may have a significant impact on the environment, even with mitigation, then the Lead Agency prepares, distributes, and certifies an EIR.

For the proposed project, the IS revealed that there were less than significant impacts to 15 of the 17 environmental factors. Two environmental factors (cultural resources and noise) were identified as factors that could be significantly impacted due to project construction activities. Mitigation was developed and agreed to that would reduce the potential impacts to less than significant. Therefore, per CEQA, a MND was prepared and publicly distributed for review and comment.

Your comment is noted and will be incorporated into the final MND for review and consideration of the decision makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or are require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,



Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez

## Easley, Sarah

---

**From:** Wood, Pat [PWOOD@ladpw.org]  
**Sent:** Monday, August 02, 2004 10:11 AM  
**To:** Easley, Sarah  
**Subject:** RE: Hansen Area Water Recycling Project - comments

Hi Sarah!

Yes, I intended my comments below to be "formal comments." Response letter is sufficient since it will be part of the ND's Administrative Record.

Patricia Wood, P.E.  
Senior Civil Engineer  
Los Angeles County Department of Public Works  
Water Resources Division  
(626) 458-6131 (Voice)  
(626) 979-5436 (Fax)  
pwood@ladpw.org

-----Original Message-----

**From:** Easley, Sarah [mailto:Sarah.Easley@ladwp.com]  
**Sent:** Monday, August 02, 2004 8:24 AM  
**To:** Wood, Pat  
**Subject:** Hansen Area Water Recycling Project - comments

Hi Pat,

After several extensions at the request of the community, we have closed the public comment period for the Hansen Area Water Recycling Project IS/MND as of July 21, 2004. I am currently in the process of preparing responses to comments received.

I kept note of your comment received in the e-mail below, and I know that you also spoke with Val and Dorothy regarding your concerns before I started on this project. As I stepped in mid-project, I was not sure how you wanted your concerns to be addressed. Did you intend this to be a formal comment? If so, I can provide you with a letter to address your concerns. Please let me know if this would work for you, or if another approach would work better.

Thank you again for your help in locating the Regional Water Quality Control Board water quality reports for the Mitigation Bank area.

Sarah Easley  
Los Angeles Department of Water and Power  
Environmental Services  
ph: 213-367-1276 fx: 213-367-4710  
sarah.easley@ladwp.com

-----Original Message-----

**From:** Wood, Pat [mailto:PWOOD@ladpw.org]  
**Sent:** Thursday, April 08, 2004 10:50 AM  
**To:** Easley, Sarah  
**Cc:** Amezquita, Val; Chimienti, Michele  
**Subject:** RE: Hansen Water Recycling Project - Golf Course EIR

Yes, that should work out for me, since I already told Val last week what our concerns are. I told Val that I believe you folks at DWP will have to demonstrate that the constituents in the recycled water will not adversely

impact the Santa Ana sucker, since the Tujunga Wash going right through the Angeles Golf Course, my downstream Big Tujunga Mitigation Bank, and down to Hansen Dam, and Tujunga Ponds adjacent to the Big T Bank and Haines Creek in the Big T Mitigation Bank appear to have been formally designated by US Fish and Wildlife Service as critical habitat for the Santa Ana sucker. Also, the suckers themselves have been found in Big T Wash and Haines Creek.

-----Original Message-----

From: Easley, Sarah [mailto:Sarah.Easley@ladwp.com]  
Sent: Thursday, April 08, 2004 8:41 AM  
To: Wood, Pat  
Subject: Hansen Water Recycling Project - Golf Course EIR

Hi Pat,

I just wanted to let you know that I today received a copy of the Draft EIR for the (currently named) Angeles National Golf Course. I did not yet send out to you the Addendum to the EIR we spoke about earlier this week, hoping to include the Draft EIR in the same package. As I now have the Draft EIR, I will have copies made today, and get a package out to you on Monday with both components. I hope this schedule works for you; please let me know if it would be beneficial to you to have the Addendum sooner.

Thank for your assistance with the Hansen Area Water Recycling Project.

Sarah Easley  
Los Angeles Department of Water and Power  
Environmental Services  
ph: 213-367-1276 fx: 213-367-4710  
sarah.easley@ladwp.com



ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Ms. Patricia Wood, P.E.  
Los Angeles County Department of Public Works  
Water Resources Division  
900 South Fremont Avenue  
Alhambra, CA 91803

Dear Ms. Wood:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comment (paraphrased) and a response to your comment is provided as follows (please refer to enclosed letter for actual comment text):

**Comment:** I believe the Los Angeles Department of Water and Power (LADWP) will have to demonstrate that the constituents in the recycled water will not adversely impact the Santa Ana sucker, since the Tujunga Wash going right through the Angeles Golf Course, my downstream Big Tujunga Mitigation Bank, and down to Hansen Dam, and Tujunga Ponds adjacent to the Big T Bank and Haines Creek in the Big T Mitigation Bank appear to have been formally designated by US Fish and Wildlife Service as critical habitat for the Santa Ana sucker. Also, the suckers themselves have been found in Big T Wash and Haines Creek.

**Response:** The construction and operation of the proposed project is not expected to have an impact on the Big Tujunga Wash Mitigation Bank. Construction will not occur on, or in proximity to, the preserve. The operation of the proposed project would not have a significant impact on downstream water bodies, plants or animals because: 1) the irrigation water's quality is regulated by numerous state and federal regulations; 2) there are strict monitoring requirements and procedures in place to mitigate any potential water quality concerns to surface or ground water at the Angeles National Golf Club (ANGC); 3) the ANGC irrigation system is designed such that recycled and potable water can be blended within the system to obtain desired water quality objectives; and

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



4) the ANGC has been designed to minimize irrigation and to collect excess water on site for re-use in their irrigation system.

Recycled water proposed to be distributed through the project facilities would receive full tertiary treatment as specified under Title 22 and disinfection. This water would meet all current state and federal water quality criteria for recycled water supplies. Water delivered to the Hansen Dam Recreation Area (HDRA) and the ANGC would be used for irrigation of turf areas only. Beyond the use of drought resistant grass, turf management practices, including irrigation optimization that conserves water (e.g., limiting areas to be irrigated) and evaporation would limit the area where recycled water would be used.

In addition to regulatory agency guidelines, the operation of the ANGC involves numerous water quality measures that limit the area that would be in contact with the recycled water (e.g., away from native plant areas). Condition 28 requires the monitoring of local surface water and groundwater quality conditions before and during the operation of the golf course. In addition, Condition 49 addresses requirements for the "Golf Course Management Plan" including control of chemicals for water quality management. Condition 138 requires the golf course to be designed to maximize infiltration and minimize runoff. And finally, Condition 139 requires the golf course to develop and implement a water quality monitoring program.

Furthermore, mitigation measure 41 approved as part of the ANGC project specifically indicates that "... as designed, there should be no movement of water from the golf course to the preserve. Precisely controlled irrigation systems will minimize runoff of irrigation waters. All drainage is away from the preserve so that even during storm events no runoff should reach the preserve from the golf course area." In addition, the ANGC has an extensive surface and groundwater monitoring program to ensure that pre-ANGC water quality is maintained. Therefore, with the conditions placed on the golf course, it is anticipated that incidental runoff (small amounts of runoff from over-spray of sprinklers or overflow during major storm events) would be very minimal and not substantial and therefore, not considered a significant or adverse impact on the ecosystem, aquifer or the Big Tujunga Mitigation Bank.

The existing water quality monitoring and mitigation program in place for the ANGC and the County's Big Tujunga Mitigation Bank will ensure that water quality in the Tujunga Wash, Hansen Dam, and downstream areas are maintained. As necessary, LADWP will coordinate with the ANGC, Regional Water Quality Control Board and Los Angeles County to continue monitoring the quality of water in the area to insure that recycled water does not negatively impact the surface or groundwater in the area.



Potential adverse impacts to the Santa Ana sucker from the irrigation use of recycled water by the ANGC are considered to be less than significant. As described above, minimal water (whether recycled, potable or blended) is expected to reach areas inhabited by the sucker. These limited amounts of recycled water are not anticipated to have a negative impact on the sucker. In fact, in the Santa Ana River, part of which has been formally designated by the US Fish and Wildlife Service as critical habitat for the Santa Ana sucker, the majority of the water flowing in the downstream portions of the river during dry months is from wastewater discharges, and the sucker continues to occur within this drainage.

Potential impacts on sensitive biological resources are further described in Appendix B of the IS/MND (Biological Resources Technical Memorandum).

Regardless of the limited amount of recycled water expected to come into contact with the sucker, it should be noted that tertiary treated recycled water has been used throughout the county and internationally in successful habitat creation and enhancement projects including: the Marsh Enhancement Project in Hayward, California restoring habitat on the shoreline of San Francisco Bay; Tres Rios Wetlands Demonstration Project and Habitat Restoration Project in Phoenix, Arizona, a constructed wetland which included enhancement of wildlife as a project objective; Brickpit in Sydney, Australia, part of Sydney Olympic Park where a constructed wetland provides habitat for the endangered Green and Golden Bell Frog; and the wildlife lake at the Sepulveda Basin Wildlife Reserve here in Los Angeles which uses tertiary treated recycled water from the Donald C. Tillman Water Reclamation Plant, the same source as proposed for use in this project.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may

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<sup>1</sup> This information is supported by the Federal Register's proposed rule for this species (50 CFR Part 17)

Ms. Patricia Wood  
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October 18, 2005

be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,

A handwritten signature in cursive script that reads "Charles C. Holloway".

Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc  
Enclosure  
c: Ms. Sarah Easley Perez

38753 26th Street East  
Palmdale, Ca. 93550  
661 266-1779

March 18, 2004

LADWP  
Environmental Affairs  
111 N. Hope Street, Room 1044  
Los Angeles, Ca. 90012

Attn: Mr. Charles Holloway

Subj: Waste Water - Golf Course Use

Dear Mr. Holloway:

You will be guilty of attempted murder or murder if you proceed with this project.

Diseases and chemicals known to mankind has killed millions of people over the years in epidemic proportion. Every known poisons, prescription drugs, with side effects, narcotics and other harmful substances are being flushed down the toilets daily.

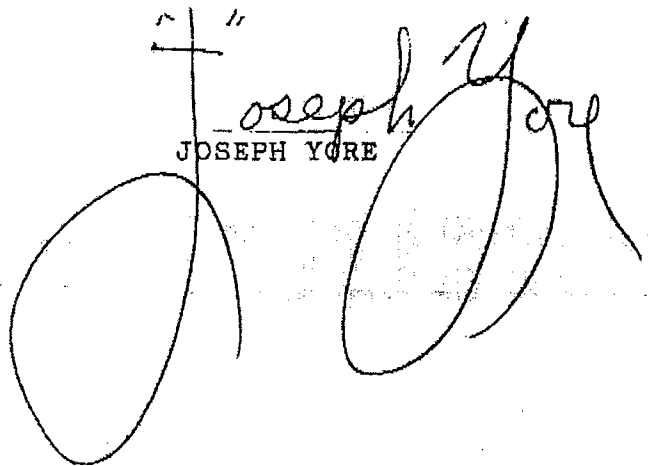
You defile the laws of nature by distorting the truth for your own gain with the Department of Water and Power by justifying a green golf course. Have you lost sight of the fact that birds, mosquitos and other flying insects take flight to distant communities carrying incurable diseases from the contaminated water on the golf course. Plus, let us not forget the animals that roam your contaminated green golf course carrying the contaminants to the surrounding communities. Oh yes, let us not forget the golpher. He handles the golf ball and with his unclean hands carries the contamination to his children. Will this be the start to the Black Plaque, Mad Cow Disease or other unknown viruses.

Those that line their pockets with riches does not justify this venture to be right,

Whether you believe in science or believe in the Christian way, ultimately, you will have to answer to The Great Supreme Father for your greed in making money on this project.

Lifetime member of the VFW. Member of the Hollywood American Legion Post 43, member of many organization to help preserve our planet for future generations. As a humanitarian, have donated my blood 132 times to the Children's Hospital and the Red Cross.

Yores truly,

A handwritten signature in cursive script that reads "Joseph Yore". The signature is written in black ink and is positioned above the typed name "JOSEPH YORE". There are two large, loopy loops in the signature, one on the left and one on the right, which are characteristic of the person's handwriting.

JOSEPH YORE



ANTONIO R. VILLARAIGOSA  
Mayor

RONALD F. DEATON, *General Manager*

October 18, 2005

Mr. Joseph Yore  
38753 26<sup>th</sup> Street East  
Palmdale, CA 93550-4171

Dear Mr. Yore:

Subject: Responses to Comments on the  
Initial Study/Proposed Mitigated Negative Declaration  
For the Hansen Area Water Recycling Project

Thank you for your comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Hansen Area Water Recycling Project. Your comments are noted and will be incorporated into the final MND for review and consideration by the decision makers.

Adoption of the Mitigated Negative Declaration and consideration of the proposed project is tentatively scheduled for November 1, 2005 at 1:30 p.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15th Floor  
111 North Hope Street  
Los Angeles, CA 90012

Prior to the scheduled meeting, the Board Agenda may be viewed on the Los Angeles Department of Water and Power website at <http://www.ladwp.com/BoardAgenda/brdagenda>, or the commission office may be contacted at (213) 367-1350. If you have any questions or require additional information, please contact Ms. Sarah Easley Perez at (213) 367-1276.

Sincerely,

Charles C. Holloway  
Supervisor of Environmental Assessment

SEP:gc

c: Ms. Sarah Easley Perez

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