

## **1.5 RESPONSES TO COMMENTS FROM AGENCIES AND ORGANIZATIONS**

Eleven letters from agencies and organizations were received during the comment period. This section contains copies of comments received and responses to these comments. Each comment is numbered in the margin of the comment letter, and the responses to all of the comments follow. The comments are referenced numerically by letter and comment number; the comment letters are numbered in sequential order. For example, the first comment in Letter 1 (Department of Fish and Game) is 1-1.

### **COMMENT LETTER 1: CALIFORNIA DEPARTMENT OF FISH AND GAME, NOVEMBER 12, 2003**

#### **Comment 1-1**

The comment concurs with the impact to Mohave ground squirrel (MGS), but would require a greater land compensation ratio than specified in the Draft EIR if MGS were identified. On page 4-108, the Final EIR describes the habitat value for MGS in the impact areas to be relatively low as assessed by a leading MGS expert, Phil Leitner, PhD. A California Department of Fish and Game (DFG) representative (Scott Harris) assessed the recommended storage reservoir area on March 20, 2003, as requiring 1/2:1 to 1:1 replacement ratio. This ratio was included in the Draft EIR. If MGS are identified or assumed to be located in an impact area (shown in Figures 4.4-6a and 4.4-6b of the Final EIR), District No. 14 will determine, in cooperation with DFG, an appropriate ratio to compensate for the affected habitat prior to applying for an incidental take permit.

#### **Comment 1-2**

The comment notes that potential impacts to desert tortoise would require consultation with DFG as well as United States Fish and Wildlife Service (USFWS). The Final EIR identifies mitigation measures that would adequately ensure that the project would not impact desert tortoise. These mitigation measures would ensure compliance with both the federal Endangered Species Act (ESA) and the California ESA.

#### **Comment 1-3**

The comment requests clarification on burrowing owl surveys. Habitat suitability for burrowing owl was determined in the project area using a combination of general and focused field reconnaissance surveys. Field surveys conducted between 2001 and 2003 followed a modified habitat assessment protocol, based on the guidelines identified in the 1995 memorandum issued by the DFG, "*Staff Report on Burrowing Owl Mitigation.*" If implemented literally, walking the entire project area at 100-foot intervals, the DFG habitat assessment guidelines would require walking up to 1,320 linear miles of transects, which is clearly infeasible. Additionally, the project biologists recognized that the implementation of such comprehensive surveys could not establish burrowing owl absence over such a large area of suitable habitat. The recommendation to conduct focused burrowing owl surveys over the 25 square mile study area is noted.

To briefly summarize the burrowing owl survey methodology, surveys of the 25-square mile project area identified three general land use categories: actively farmed agricultural lands, formerly cultivated fallow lands, and native saltbush scrub vegetation. Because access to private (agricultural) lands was not available during the field reconnaissance, burrowing owl surveys were conducted by driving major roads that surrounded each quarter section (1/4 square mile area). Walking surveys and more intensive reconnaissance-level surveys were conducted in natural and remote areas that provided at least moderate quality habitat for burrowing owl and other special status species. Where such habitat was available,

however, surveys were not intended to establish burrowing owl absence, but to establish habitat suitability for this species. Survey access was available to all portions of the project area, thus a thorough determination of current and historic land use and habitat suitability was possible through the reconnaissance surveys.

Based on these findings, the project biologists identified that suitable burrowing owl habitat was present throughout the project area; both in natural and disturbed areas as noted on page 4-91 of the Final EIR. Five non-nesting burrowing owls were identified during surveys, all in disturbed and/or modified habitats: two perched on an agricultural standpipe near 50<sup>th</sup> St. East and Ave. F, and three others near the intersection of Avenue D and 50<sup>th</sup> St. East, seeking cover under a discarded piece of sheet metal. Surveys identified very few natural burrowing owl nest sites in the project area, with owl activity concentrated near trash sites and disturbed and/or agricultural areas that are prevalent throughout the project area.

#### **Comment 1-4**

The comment that the loss of breeding, foraging, and wintering burrowing owl habitat in the Antelope Valley should be considered a direct and cumulatively significant adverse impact under the California Environmental Quality Act (CEQA) is noted. The project is located adjacent to substantial amounts of undeveloped open space at the Edwards Air Force Base (EAFB) that will not likely be developed in the future. The project also provides habitat mitigation for impacts to special status plants and wildlife, such as alkali mariposa lily and potentially MGS (mitigation measure 4.4-1 and 4.4-6) that will serve equally to compensate for habitat losses for burrowing owl.

#### **Comment 1-5**

The comment states that migratory birds are protected under the Federal Migratory Bird Treaty Act (MBTA). The comment is noted and is recognized on page 4-98 of the Final EIR.

#### **Comment 1-6**

The comment states that construction activities should avoid the migratory bird nesting season if possible. If this is not possible, the comment recommends conducting pre-construction surveys and establishing suitable buffer areas around active bird nests. Based on this comment, Impact 4.4-3 and mitigation measure 4.4-3 shall be revised as follows to provide protections to common bird species that are protected under the MBTA during project implementation.

**Impact 4.4-3: The construction of storage reservoirs for Alternatives 1 and 2 and the conversion of previously undeveloped areas in the eastern and western agricultural areas for each alternative would cause the loss of potential habitat for burrowing owls, loggerhead shrike, Le Conte's thrasher, and California horned lark, as well as more common migratory birds that are protected by the Migratory Bird Treaty Act (MBTA).**

**Mitigation Measure 4.4-3: If project activities cannot avoid the breeding bird season (generally March 1 – August 31), District No. 14 shall conduct focused preconstruction breeding bird surveys to include burrowing owl, loggerhead shrike, Le Conte's thrasher, California horned lark, as well as other species protected under the MBTA, in all areas that may provide suitable nesting habitat. For activities that occur outside the breeding bird season (generally September 1 through February 28) such surveys would not be required.**

**No more than two weeks before construction, a survey for burrows and burrowing owls would be conducted by a qualified ornithologist. Surveys would conform to the protocol described by the California Burrowing Owl Consortium (1993) which includes up to four surveys on different dates if**

there are suitable burrows present. Surveys would include areas within 500 feet of the construction area that provide potential burrowing owl nesting habitat (access permitting). Simultaneous with the owl surveys, an assessment of the construction area would also be conducted to determine the nesting status of loggerhead shrike, Le Conte's thrasher, and California horned lark, and other birds protected by the MTBA.

If any of the above species are identified, occupied nests or burrows would not be disturbed during the nesting season (February 1 through August 31 for owls and other raptors; March 1 through August 31 for other species), including a minimum 250-foot buffer zone around any occupied burrow or nest 150 feet for other non-special status passerine birds, and up to 500 feet for raptors. During the non-nesting season, District No. 14 would encourage owls to relocate from the Stage V construction disturbance area to off-site habitat area through the use of one-way doors on burrows. No relocation measures are required for loggerhead shrike, Le Conte's thrasher, or California horned lark during the non-breeding season.

#### **Comment 1-7**

This comment suggests field survey and construction avoidance methods for nesting birds, some of which have been incorporated into mitigation measure 4.4-3. As revised, mitigation measure 4.4-3 provides sufficient buffer distance to avoid the "take" of protected nesting birds.

#### **Comment 1-8**

The comment states that Hoover's eriastrum should be included in sensitive species surveys, and that mitigation ratios for sensitive plants should be approved by DFG staff. The Final EIR summarizes the results of a sensitive plant survey of the proposed storage reservoir area, conducted following DFG protocols. The survey report (included as Appendix I in the Final EIR) did not locate any Hoover's eriastrum. The draft *Recovery Plan for Upland Species of the San Joaquin Valley, California*, prepared by the USFWS identified the nearest Hoover's eriastrum population in the vicinity of the City of Bakersfield. DFG's California Natural Diversity Database similarly, does not report any occurrences of this species in the project area (as of January 3, 2004). These sources document no populations of this species in Ventura County or Los Angeles County. Additionally, Hoover's eriastrum was delisted by the federal government on October 7, 2003 and this species has no State status. The California Native Plant Society considers this species as a List 4 species (Plants of limited distribution), which means that impacts to this species would be below the CEQA threshold of significance.

#### **Comment 1-9**

A DFG representative (Scott Harris) assessed the proposed storage reservoir location north of the LWRP on March 20, 2003, as requiring 1/2:1 to 1:1 replacement ratio for impacts to sensitive plant areas based on habitat quality. This ratio was included in the Draft EIR in mitigation measure 4.4-1. Focused surveys were conducted throughout the areas with known or suspected potential to support special status plant populations. If additional plant populations are identified during later support surveys District No. 14 would survey findings with the DFG plant ecologist and identify a suitable avoidance or replacement strategy for habitat impacts.

#### **Comment 1-10**

The comment states that the mudflat habitat would be considered a sensitive habitat under CEQA, and that the affected wetland acreage has not been quantified. On page 4-113, the Final EIR estimates that the size of the mudflat habitat ranges from 100 to 2,000 acres depending on overflow from Piute Ponds. During some rain events, the entire lakebed is covered with over a foot of water. The State of California

clearly has jurisdiction over the mudflat habitat created by naturally occurring flows following rain events, but not over artificial, effluent-induced overflows (see response to comment 1-11). The Final EIR concludes that the significance of the elimination of the artificial habitat would be associated with the effects to migratory shorebirds that currently utilize that habitat during periods of artificial overflow.

#### **Comment 1-11**

The comment states that a Streambed Alteration Agreement (SAA) is required for any direct or indirect impact to a lake or streambed. The comment states that the Draft EIR does not adequately characterize impacts to the mudflat areas as being subject to an SAA. Section 1602 of the California Fish and Game Code requires that projects affecting natural flows within a jurisdictional creek must first obtain a SAA from DFG.

1602. (a) An entity may not substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake, unless all of the following occur:...

The Final EIR finds that natural flows would not be affected by the elimination of the effluent induced overflows. Therefore, Section 1602 of the Fish and Game Code would not apply and an SAA would not be required by the project.

#### **Comment 1-12**

The comment questions whether an alternative could be developed in which the mudflat habitat enhanced by artificial overflows could be maintained without impinging on the EAFB mission. This suggested alternative would be District No. 14's preferred alternative. District No. 14 has conducted numerous discussions with EAFB. The schedule of completion of the LWRP 2020 Plan and Draft EIR was delayed for over a year while these discussions were conducted. The LWRP 2020 Plan has been developed without a feasible project alternative primarily involving EAFB as a means of complying with the Regional Water Quality Board Order. DFG also questions whether EAFB needs the entire Rosamond Dry Lake for emergency landing, and whether eliminating mudflat habitat conforms with EAFB's Integrated Natural Resources Management Plan goals and commitments for the Base. EAFB staff contend that the overflows impact the Base's mission and that elimination of overflows is consistent with the natural resources management goals of the Base. (See comment letter 4 and responses)

#### **Comment 1-13**

The comment states that DFG can not approve a SAA when significant unavoidable impacts to wildlife would likely result. As identified in response to Comment 1-11, above, Section 1602 of the Fish and Game Code does not apply and an SAA would not be required by the project.

#### **Comment 1-14**

The comment requests that every effort be made to avoid the significant impact to the effluent induced mudflat habitat. The proposed cessation of artificial flows from Piute Ponds would not eliminate natural flows onto Rosamond Dry Lake or cause a reduction in flows from historic levels. Overland flows created by storm flows periodically inundate the lakebed and create mudflat habitat, as observed in winter 2003. The margins of the flooded areas in Rosamond Dry Lake create mudflat habitats that may be used for foraging by wading shorebirds at a time that is consistent with peak shorebird use periods. A reduction or cessation of artificial flows from the effluent management facility (Piute Ponds) would not eliminate the presence of mudflat habitat at Rosamond Dry Lake. Rather, the availability of mudflat

habitat at Rosamond Dry Lake would be reduced to historic levels prior to the start of artificial flows from the effluent management facility.

**Comment 1-15**

The comment requests that the Final EIR evaluate potential water quality impacts to Piute Ponds resulting from the elimination of effluent induced overflows. Impact 4.3-8 on page 4-75 of the Final EIR addresses the potential impact to water quality from elimination of effluent induced overflows. The Final EIR provides mitigation measures (4.3-10 and 4.3-11) to ensure that water quality would not be adversely affected. These mitigation measures commit District No. 14 to conducting a water quality assessment of the ponds to determine the extent to which the water quality could decrease below receiving water limitations of the LWRP Waste Discharge Requirements. These limitations are developed to be protective of biological resources. EAFB contends that naturally occurring overflows would be adequate to maintain adequate water quality. (See comment letter 4) Should the assessment conclude that naturally occurring overflows would not be sufficient to meet the discharge permit limitations, mitigation measure 4.3-11 commits District No. 14 to negotiating with EAFB an appropriate means of protecting Piute Ponds by either through controlled flushing flows or through implementation of a mutually-approved circulation system, subject to additional CEQA and National Environmental Policy Act (NEPA) review.

**Comment 1-16**

The comment requests that the Draft EIR be modified to reflect the concerns identified by DFG, and is noted.

**COMMENT LETTER 2: DEPARTMENT OF WATER RESOURCES**

**Comment 2-1**

The comment describes the State of California guidelines and regulations regarding safety of dams and specifies the restrictions and requirements applicable to the effluent storage reservoirs proposed under the LWRP 2020 Plan. If the storage reservoir design proposed by District No. 14 is non-jurisdictional in berm height, District No. 14 will comply with Section 6025.5 of the California Water Code. If the berm design is jurisdictional, District No. 14 will comply with the requirements of the Division of Safety of Dams prior to construction of the storage reservoirs.

**COMMENT LETTER 3: REGIONAL WATER QUALITY CONTROL BOARD, LAHONTAN REGION, NOVEMBER 18, 2003**

**Comment 3-1**

The comment states that the Draft EIR is deficient in numerous areas requiring supplemental information. The Final EIR has been revised to reflect comments received during the public review process. See Master Responses. The following responses address specific comments.

**Comment 3-2**

The comment states that a sentence in the Draft EIR misrepresents Regional Water Quality Control Board (RWQCB) Order No. R6V-2002-053. The sentence on page ES-4 has been revised as follows:

The Regional Water Quality Control Board, Lahontan Region (RWQCB-LR) has mandated that the threatened nuisance condition created by effluent induced overflows to Rosamond Dry Lake be eliminated by August 25, 2005.

### Comment 3-3

The comment states that the Draft EIR does not evaluate the potential to degrade groundwater from continued use of the oxidation ponds under Alternatives 1 and 3. The comment states that it is impossible to compare alternatives without evaluating this impact. The Draft EIR incorporated all available information on the groundwater quality in the vicinity of the oxidation ponds and found no evidence of groundwater degradation attributable to the oxidation ponds. On-going groundwater monitoring has occurred since the storage reservoirs were constructed in 1988. The Final EIR mentions on page 4-66 that recent groundwater investigations conducted in the vicinity of the existing oxidation ponds show no evidence that the oxidation ponds have degraded the groundwater. Reports of these investigations were sent to the Regional Water Quality Control Board, Lahontan Region (RWQCB-LR) as part of the application for the current Waste Discharge Requirements (WDRs). The Final EIR states that the RWQCB-LR has required District No. 14 to expand the monitoring program to obtain more data. Implementation of this additional monitoring is a condition of the existing WDRs and is being implemented by District No. 14.

The Final EIR assumes that the use of the existing oxidation ponds under Alternatives 1 and 3 would not degrade groundwater, since no evidence of degradation has been identified in the area since monitoring wells were constructed in 1988, and since the RWQCB-LR recently issued WDRs for the LWRP. Future use of the oxidation ponds are permitted under the existing WDRs. This notwithstanding, the comment is correct in pointing out that if future use of the oxidation ponds resulted in degraded groundwater quality, it would be considered a significant impact of the LWRP 2020 Plan. As such, the impact statement 4.3-4 has been revised as follows:

**Impact 4.3-4: Effluent water infiltrating into the groundwater from storage reservoirs or oxidation ponds could degrade groundwater quality.**

Implementation of Alternatives 2 or 4 of the LWRP 2020 Plan would remove these ponds from service, thereby eliminating the potential impact. An additional mitigation measure have been added to the Final EIR for Alternatives 1 and 3 as follows:

Alternatives 1 and 3

**Mitigation Measure 4.3-4b: If groundwater monitoring finds that infiltration from the oxidation ponds has significantly degraded groundwater, District No. 14 will coordinate with the RWQCB-LR to identify the most appropriate method of remediating the condition and preventing further degradation.**

### Comment 3-4

The comment states that the Draft EIR does not contain sufficient information to justify groundwater quality impacts and does not quantify the potential transport of nitrogen and any other contaminants to the groundwater from the use of storage reservoirs or land application, therefore there is no basis for the conclusion that Alternatives 1 and 2 would pose less of an impact than Alternatives 3 and 4. The comment states further that the Anti-Degradation Policy should not be seen as a threshold of significance since the policy provides criteria that allows the RWQCB-LR to permit degradation under certain circumstances. See Groundwater Protection Master Response.

The Final EIR identifies the potential impact to groundwater quality from the use of storage reservoirs on page 4-65. Further, the Final EIR clearly identifies significance thresholds as being a violation of water quality standards or WDRs, or the substantial degradation of water quality (pages 4-61 and 4-62). The Final EIR does not quantify what a substantial degradation would be, since any degradation could be considered unacceptable under certain circumstances. The Final EIR concludes that the construction of a synthetic liner approved by the RWQCB-LR (Alternative 1) or compacted native soil (Alternative 2) would be sufficient to avoid substantial degradation and therefore avoid a significant impact of the project. District No. 14 will submit an application to the RWQCB-LR to construct the effluent storage reservoirs. The application will contain specific permeability standards and projected water quality degradation as required by the RWQCB-LR and as supported by an Anti-Degradation Analysis.

On page 4-67, the Final EIR states that violation of the Anti-Degradation Policy would be a significant impact of the project. The Final EIR does not state that any degradation of groundwater would be a violation of the policy. Approval by the RWQCB-LR of the storage reservoir design and permeability standards would ensure that the policy is not violated and that no significant impact would result.

### **Comment 3-5**

The comment states that the Draft EIR does not identify measures to avoid the significant impact of eliminating the periodic mudflat habitat. The comment suggests that retaining some overflow could sustain some habitat and reduce the level of significance of the impact without causing a nuisance condition that would be in violation of the WDRs. District No. 14 concurs with this comment. A negotiated agreement with Edwards Air Force Base (EAFB) to allow these overflows without causing a nuisance would reduce this impact to less than significant levels. At this time, EAFB has not agreed to authorize any effluent-induced overflows onto Rosamond Dry Lake. EAFB does not agree that the temporary mudflat provided by the effluent-induced overflow is a sensitive habitat or that its elimination would constitute a significant impact. See response to comment letter 4. Therefore, District No. 14 can not avoid this identified impact at this time.

### **Comment 3-6**

The comment states that the Draft EIR fails to evaluate impacts to groundwater from the storage reservoirs. The comment asks why impacts to groundwater from land application were deemed to be significant whereas impacts from the storage reservoirs were not. See Groundwater Protection Master Response.

The Final EIR identifies infiltration from storage reservoirs as a potential impact of the project and identifies the threshold of significance of this impact as a violation of water quality standards or WDRs, or the substantial degradation of water quality. The Final EIR does not establish numeric thresholds of significance for each constituent of concern. The Final EIR commits District No. 14 to design and construct storage reservoirs that would be adequately protective of groundwater quality as approved by the RWQCB-LR. Numerous treated wastewater impoundments are permitted by the RWQCB-LR in the region. However, for the long-term land application operations proposed under Alternatives 3 and 4, the permeability of agricultural soils clearly would not be adequate to protect groundwater quality over a long-term application period. Therefore, the Final EIR assumes that the resulting degradation could potentially be substantial. Therefore, the potential impact was seen as significant for Alternatives 3 and 4. See Groundwater Protection Master Response.

### **Comment 3-7**

The comment states that the Draft EIR does not establish a desired water quality within Piute Ponds. The comment also states that District No. 14 does not propose higher levels of treatment as a potential

mitigation measure to protect Piute Ponds water quality. On page 4-75, the Final EIR acknowledges that water quality could be affected by the elimination of flushing flows through Piute Ponds. On page 4-75, the Final EIR states that the threshold of significance for this potential impact would be the violation of the receiving water limitations contained in the WDR. The Final EIR on page 4-77 states that the toxicity of each constituent of concern is difficult to predict. Therefore, no numeric thresholds for specific constituents are provided.

In mitigation measure 4.3-11, the Final EIR acknowledges that installation of a recirculation system would require additional analysis to comply with CEQA and NEPA requirements prior to implementation.

The Final EIR states on page 4-77 that improved treatment would not eliminate the potential for the impact since concentrations of total dissolved solids (TDS) and other potentially deleterious constituents would increase during evaporation regardless of the influent concentrations.

### **Comment 3-8**

The comment states that the Draft EIR does not adequately characterize the potential health risk associated with wind drift of sprinkler-applied recycled water. The comment asks for more information on the potential public health effects caused by wind. The comment further suggests that flood irrigation could mitigate the impact. See Public Health Master Response. The Final EIR discusses the potential risk of exposure from the use of recycled water on page 4-170. The Final EIR concludes that the sprinkler-application methods allowed by the California Department of Health Services would not result in adverse health impacts since the effluent will be disinfected and applied close to the ground. The application method would be reviewed and approved by the RWQCB-LR prior to issuance of the Water Recycling Requirements permit. District No. 14 agrees with the comment that flood irrigation could avoid this potential impact. However, flood irrigation would increase the potential for groundwater degradation due to the uneven water application method required under this irrigation technique.

### **Comment 3-9**

The comment points out that the monitoring results for nitrogen provided in Tables 2-7 and 2-8 are not equivalent since one is shown as milligrams per liter of nitrogen (mg/L – N) and the other milligrams per liter (mg/L). The tables provide monitoring results submitted to the RWQCB-LR pursuant to the requirements in the WDRs.

### **Comment 3-10**

The comment states that a sentence on page 3-11 should include a reference to land application. The comment also states that Figure 3-6 does not identify groundwater impacts. The sentence on page 3-11 has been changed as follows:

The increased effluent management capacity needed will be met primarily with increased agricultural operations and storage reservoirs under Alternatives 1 and 2, and primarily with increased agricultural operations and land application under Alternatives 3 and 4.

The objective of Figure 3-6 is to provide a flow chart of the treatment process in the Project Description section. The LWRP is not designed to allow for substantial percolation of effluent into the groundwater.



### Comment 3-11

The comment states that the potential effects of tail water ponds and retention basins have not been assessed in the Draft EIR. On page 4-67, the Final EIR does identify that retention basins and tail water ponds could contribute to groundwater degradation associated with agricultural reuse. Use of center pivots would eliminate the need for tail water ponds. However, to ensure that retention basins do not result in substantial infiltration, the following mitigation measure is added to the Final EIR.

**Mitigation Measure 4.3-6b:** District No. 14 shall provide liners to agricultural retention basins to prevent substantial infiltration of applied water or, with RWQCB-LR approval, manage these basins to minimize infiltration to ensure protection of groundwater.

### Comment 3-12

The comment states that the Draft EIR does not evaluate or provide a time period for the temporary land application to be conducted under Alternatives 1 and 2. On page 3-15 the Final EIR indicates that land application would be necessary under Alternatives 1 and 2 for an interim period. This period is anticipated to be approximately 1 to 2 years. On page 4-70, the Final EIR states that short-term land application operations proposed under Alternatives 1 and 2 would not result in a substantial degradation of groundwater quality since the depth to groundwater is large and the application would be temporary.

However, as a result of comments received regarding this potential impact, District No. 14 has removed this interim land application component from Alternatives 1 and 2. Although all reasonable efforts are being made to have facilities in place to meet the RWQCB-LR deadline, all Stage V effluent management facilities will not be completed in time. The process of acquiring land for agricultural operations and storage reservoirs is anticipated to last through the summer of 2005 due to the significant number of parcels that will be involved and the necessary legal requirements that must be complied with for public acquisition of land. The pump station and pipeline to the proposed agricultural reuse sites east of the LWRP is scheduled for completion in the summer of 2006, while the Stage V storage reservoirs are scheduled for completion in early 2007. District No. 14 will manage effluent from the LWRP by delivering recycled water to the existing effluent management sites (Piute Ponds, Impoundment Areas, Apollo Park, Nebeker Ranch, and existing storage reservoirs), and applying recycled water at defined irrigation rates on the Stage V agricultural reuse sites as they are established. During the winter months, when evaporation rates and reuse demand are low, District No. 14 will continue its present practice of controlled effluent discharge to Piute Ponds in a manner that does not create a threatened nuisance condition for EAFB. Although the Stage V storage reservoirs are expected to be complete in early 2007, the CAS and tertiary treatment facilities are not scheduled for completion until the summer of 2008. Using the Stage V reservoirs for storing oxidation pond effluent from early 2007 to the summer of 2008 may not be acceptable to the RWQCB-LR. After the summer of 2008, tertiary effluent will be available for agricultural and municipal reuse operations and surplus effluent will be stored in the Stage V reservoirs during the winter months. As these facilities become operational, effluent-induced overflows onto Rosamond Dry Lake will be greatly reduced. All effluent overflows onto Rosamond Dry Lake will be eliminated after April 2009. District No. 14 is working with the RWQCB-LR and EAFB to ensure that continuation of controlled effluent overflows during this period does not create a threatened nuisance condition.

### Comment 3-13

The comment states that the Draft EIR is not justified in claiming that Alternatives 1 and 2 are environmentally superior to Alternatives 3 and 4 based on potential impacts to groundwater quality. See Groundwater Protection Master Response. See response to comment 3-5 above.

**Comment 3-14**

The comment states that the Draft EIR does not discuss the potential impacts to groundwater from nitrates. The comment also asks how salt in the soil would be managed. The Final EIR indicates that nitrates and TDS are potential contaminants of concern resulting from the proposed project. Substantial degradation of groundwater from nitrates or TDS is seen as a potentially significant impact of the project. District No. 14 proposes to apply recycled water at agronomic rates to avoid over-application of effluent that could result in substantial degradation. On page 4-67, the Final EIR acknowledges that salt flushing practices to push salts out of the root zone and further into the vadose zone would be utilized if needed. On page 4-70 the Final EIR discusses how periodic flushing coupled with drying would minimize percolation to the groundwater of flushed salts. The Final EIR commits District No. 14 to implementing a Farm Management Plan that will outline specific standard operating procedures to effectively manage the farm operations and prevent substantial degradation of groundwater. The recommended project (Alternative 2) would include providing nitrification/denitrification treatment that would substantially reduce the potential for nitrate contamination. See Farm Management Plan Master Response.

**Comment 3-15**

The comment states that District No. 14 can not state that a National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges is applicable while at the same time acknowledging that an NPDES discharge permit is not required for the LWRP effluent since Amargosa Creek is not a *waters of the United States*. District No. 14 considers that the storm water discharge requirements established by the California State Water Resources Board (SWRCB) for the State of California under the State-wide storm water permits apply to all areas of the state, even those areas not associated with *waters of the United States*. Therefore, District No. 14 complies with NPDES permit requirements for storm water discharges.

**Comment 3-16**

The comment states that the Final EIR should provide permeability levels for the proposed storage reservoirs and establish levels of degradation of groundwater that are acceptable. CEQA requires that an EIR identify potential impacts and evaluate their significance. The Final EIR identifies potential impacts to groundwater quality and clearly establishes thresholds of significance. The Final EIR concludes that construction of low-permeability reservoirs would avoid substantial degradation of groundwater quality from storage reservoirs. The numeric permeability goals requested in the comment would be included in the application for WDRs. The RWQCB-LR as a responsible agency would evaluate the proposed permeability thresholds and determine whether to issue WDRs. If the application for WDRs is not approved by the RWQCB-LR, the project would not be implemented and District No. 14 would risk violation of Regional Board Order No. R6V-2002-053. See Groundwater Protection Master Response. See response to Comment 3-5 above.

**Comment 3-17**

The comment states that the RWQCB-LR has requested additional information to determine whether the existing operations at the LWRP have impacted groundwater. The Final EIR acknowledges this statement on page 4-66.

**Comment 3-18**

The comment states that the Draft EIR does not identify the total nitrogen to be applied. The comment states that impacts from nitrogen loading need to be assessed in the Final EIR. The Final EIR discusses nitrogen loading on page 4-69. The Final EIR identifies nitrogen loading as a potentially significant

impact of the project. Mitigation measure 4.3-5 requires District No. 14 to implement a Farm Management Plan to manage application of recycled water. Mitigation measure 4.3-6 requires that District No. 14 implement a monitoring program to identify potential water quality effects of the farming operations. The mitigation measure requires that District No. 14 modify treatment if necessary to avoid nitrogen pollution. The recommended project would include providing nitrification/denitrification that would substantially reduce the potential for nitrate contamination. See Groundwater Protection Master Response.

**Comment 3-19**

The comment states that the impact to water quality of Piute Ponds can not be identified or mitigated without determining flushing flow volume requirements. See response to comment 3-6 above. The Final EIR assumes that the elimination of overflows could result in degraded water quality. The Final EIR concludes that this impact would be considered significant if the receiving water limitations listed in the WDRs were exceeded. Mitigation measure 4.3-10 requires District No. 14 to conduct a study to determine operational procedures to avoid violating the WDRs for receiving water.

**Comment 3-20**

The comment states that the Draft EIR does not evaluate measures to avoid impacting periodic mudflat habitat. See response to comment 3-4.

**Comment 3-21**

The comment requests that District No. 14 “explore the validity of the assumption” that biosolids will be disposed of at the San Joaquin Composting Facility. The Final EIR states on page 4-158 that new disposal locations could be explored by District No. 14 as regulations and options change in the future. However, at this time the LWRP 2020 Plan proposes no changes to its current biosolids management program, which involves hauling of stockpiled biosolids to San Joaquin Composting Facility in Kern County.

**COMMENT LETTER 4: UNITED STATES AIR FORCE, AIR FORCE FLIGHT TEST CENTER, EDWARDS AIR FORCE BASE, NOVEMBER 14, 2003**

**Comment 4-1**

The comment states that the Draft EIR incorrectly identifies a mudflat habitat on Rosamond Dry Lake and that the Air Force Flight Test Center, Edwards Air Force Base (EAFB) disagrees with the conclusion that the project would result in a loss of shorebird habitat. The Final EIR provides detailed discussion on this issue on pages 4-113 through 4-116. District No. 14 acknowledges that the EAFB does not agree with the conclusions of the Final EIR regarding the periodic mudflat habitat. Other responsible agencies disagree with the EAFB on this issue. (See Comment Letter 1 in which the California Department of Fish and Game (DFG) agrees with the identification of the habitat in the Draft EIR.) CEQA acknowledges that disagreements among experts sometimes occur and that the lead agency must provide substantial evidence in the record to support the conclusions of the Final EIR. CEQA Section 15151 concludes that the record should provide adequate analysis in a “good faith effort at full disclosure.” As noted in the comment letter from DFG, it is not unreasonable to presume that a periodic habitat is indeed created during periods of overflow and that the habitat does provide some value to migratory and local species beyond what is provided by the natural flow of Amargosa Creek and other contributing washes surrounding the dry lake.

**Comment 4-2**

The comment states that the LWRP 2020 Plan would not result in impacts to migratory birds. The comment states that EAFB does not intend to permit continued overflow in order to sustain an artificial condition that constitutes a nuisance condition. As discussed on pages 4-113 through 4-116, information from qualified biologists concludes that the artificial habitat created by the overflow provides a unique habitat to shorebirds not found elsewhere in the Piute Ponds complex during certain times of the year. The biologists' conclusion is not conditioned by how the habitat has come to be, but only that it seems to be the reality on the ground at present. The elimination of the overflow would eliminate the artificially created condition. This assessment is shared by the DFG (see Comment Letter 1). The Final EIR concludes that this would result in a significant impact that is unavoidable since similar habitat during those overflow periods is not reproducible elsewhere. Therefore, approval of the project would require adoption of overriding considerations by District No. 14's Board of Directors.

**Comment 4-3**

The comment states that the LWRP 2020 Plan relies on year-round discharges to the impoundment areas, a condition that has not been agreed to by EAFB. Page 3-17 of the Final EIR describes that no discharges into the impoundment areas would be allowed from April 15 through October 31 as is currently the case. The LWRP 2020 Plan assumes that operations of the impoundment areas would remain consistent with existing conditions. District No. 14 requests approval to fill the impoundment areas each year.

**Comment 4-4**

The comment states that the May 6, 1981, Letter of Agreement (LOA) between District No. 14 and EAFB describes the Piute Ponds complex as comprising 200 acres. The comment states that EAFB stands by the original agreement allowing 200 acres of habitat. The Final EIR characterizes the existing habitat at approximately 400 acres. The Final EIR further commits District No. 14 to maintaining this habitat such that there would be no net loss of wetland habitat. District No. 14 understands that this increased size of the ponds has not been agreed to in an official letter of agreement by EAFB.

**Comment 4-5**

The comment states that providing periodic flushing of the ponds will only require mitigation when and if this becomes an issue. The Final EIR commits District No. 14 to studying whether the project would degrade water quality in the ponds. If this becomes an issue, the Final EIR commits District No. 14 to implementing a plan in coordination with EAFB to protect natural resources of the region.

**Comment 4-6**

The comment states that page 1-3 of the LWRP 2020 Plan incorrectly states that the impoundment areas are used for duck hunting by local duck hunting clubs. The Final EIR reflects the correct information on page 4-11. The LWRP 2020 Plan has been revised to reflect this information. The comment does not address the adequacy of the Draft EIR. No response is necessary.

**Comment 4-7**

The comment states that a sentence of the LWRP 2020 Plan is misleading. The comment does not address the adequacy of the Draft EIR. No response is necessary.

**Comment 4-8**

The comment addresses a statement on page 3-6 of the LWRP 2020 Plan. The comment does not address the adequacy of the Draft EIR. No response is necessary.

**Comment 4-9**

The comment addresses the discussion on Bird Air Strike Hazards (BASH) in the LWRP 2020 Plan. The comment does not address the adequacy of the Draft EIR. The comment provides a map, which depicts the VR-1206 low flight corridor. The Final EIR on page 4-168 acknowledges the existence of a low flight corridor over the project area and describes the potential BASH related to low flight. The Final EIR concludes that the project would reduce local bird usage of the area and therefore would be beneficial with respect to BASH. In addition, the discussion in the Final EIR comparing alternative storage reservoir study areas on page 5-18, as well as the summary in Table 5-3, has been changed to reflect this comment.

**Comment 4-10**

The comment states that the operational changes referred to on page ES-4 of the Draft EIR would be terminated with implementation of the LWRP 2020 Plan. The Final EIR and LWRP 2020 Plan assume that unauthorized nuisance effluent overflows will be entirely eliminated with implementation of the project recommended by LWRP 2020 Plan .

**Comment 4-11**

The comment states that District No. 14 is not committed to maintaining the wildlife and recreational uses of the impoundment areas. Page 3-17 of the Final EIR describes that the impoundment areas dry up during the summer. This condition will continue under the LWRP 2020 Plan, in compliance with the 1991 Memorandum of Agreement.

**Comment 4-12**

The comment states that discharge to Piute Ponds should be stopped when the holding capacity of the ponds has been reached, including during storm events. District No. 14 will discharge an adequate volume of effluent to Piute Ponds to maintain its existing area and habitat in compliance with all regulations, including the WDRs for the LWRP.

**Comment 4-13**

The comment suggests that all mention of the snowy plover as a sensitive species be removed from the Draft EIR. Table 4.4-2 of the Final EIR summarizes the status of the snowy plover for both the coastal and inland populations based on information obtained from the California Natural Diversity Database. The inland populations of snowy plover are considered by DFG to be a California Species of Special Concern.

**Comment 4-14**

The comment disagrees with the Draft EIR's conclusion that elimination of effluent induced overflows would result in a significant impact to mudflat habitat. See responses to comments 4-1 and 4-2. The comment also states that overflows must be eliminated. One objective of the LWRP 2020 Plan is to eliminate unauthorized nuisance overflows onto Rosamond Dry Lake. As such, the District No. 14 Board of Directors will adopt overriding considerations concerning the significant impact identified in the Final EIR for reduction of mudflat habitat. See response to comment 3-12.

**Comment 4-15**

The comment disagrees with the Draft EIR's conclusion that elimination of effluent induced overflows would result in a significant impact to mudflat habitat. See responses to comments 4-1 and 4-2. The comment also states that overflows must be eliminated. One objective of the LWRP 2020 Plan is to eliminate unauthorized nuisance overflows onto Rosamond Dry Lake. As such, the District No. 14 Board of Directors will adopt overriding considerations concerning the significant impact identified in the Final EIR for reduction of mudflat habitat. See response to comment 3-12.

**Comment 4-16**

The comment requests that detailed information on EAFB biological resources be eliminated from the document since they do not relate to the project. Section 4.4 of the Final EIR beginning on page 4-79 describes the biological setting of the "Assessment Area" shown in Figure 3-1. The only portion of the "Assessment Area" within EAFB described in the Final EIR relates to the Piute Pond complex and effluent induced overflow area which is clearly within a potential impact area of the proposed project.

**Comment 4-17**

The comment states that additional comments will be submitted on the Draft EIR. See responses to comments 4-1 through 4-14.

**Comment 4-18**

The comment states that the project would not impact the Piute Ponds area and therefore would not require a finding of overriding considerations. See responses to comments 4-1 and 4-2.

**Comment 4-19**

The comment suggests coordination with California Department of Transportation (Caltrans) regarding a highway improvement project planned within the eastern agricultural study area. District No. 14 is aware of the proposed Caltrans project, which will not be implemented for at least 10 years. Caltrans has agreed to coordinate this highway improvement activity with District No. 14.

**Comment 4-20**

The comment suggests that the impoundment areas are not maintained for wetland habitat. See response to comment 4-11.

**Comment 4-21**

The comment states that the May 6, 1981, agreement between District No. 14, DFG, and EAFB is a Letter of Agreement (LOA), not a Memorandum of Understanding (MOU). The Final EIR has been revised to reflect the LOA.

**Comment 4-22**

The comment states that the original commitment by EAFB was for 200 acres of habitat. See response to comment 4-4.

**Comment 4-23**

The comment states that committing 95 million gallons per year to the impoundment areas has not been agreed to by EAFB. See response to comment 4-3.

**Comment 4-24**

The comment states that discharge to Piute Ponds should be stopped when the holding capacity of the ponds has been reached, including during storm events. See response to comment 4-12.

**Comment 4-25**

The comment corrects a draft version of the EIR which was corrected in the Draft EIR published on September 30, 2003. No response is necessary.

**Comment 4-26**

This comment suggests removal of the description of the mudflat habitat. District No. 14 disagrees that this description is inaccurate. See response to comment 4-1.

**Comment 4-27**

The comment was made on an earlier draft of the EIR requesting that the word “wetland” be replaced by “marsh-like.” The Draft EIR published on September 30, 2003, was modified to reflect this global comment where applicable.

**Comment 4-28**

The comment suggests removal of reference to snowy plover. See response to comment 4-13.

**Comment 4-29**

The comment requests that the Final EIR clearly state that the Piute Ponds complexes are not considered to be jurisdictional wetlands subject to the Clean Water Act. This is clearly expressed on page 4-93 of the Final EIR.

**Comment 4-30**

The comment suggests that the impact to fringe-toed lizard be removed. This impact remains in the Final EIR based on evaluation of the literature for the area. The Final EIR concludes that the project would not significantly affect fringe-toed lizard habitat.

**Comment 4-31**

The comment disagrees with the Draft EIR’s conclusion that elimination of effluent induced overflows would result in a significant impact to mudflat habitat. See responses to comments 4-1 and 4-2.

**Comment 4-32**

The comment corrects a draft version of the EIR which was corrected in the Draft EIR published on September 30, 2003. No response is necessary.

**Comment 4-33**

The comment corrects a draft version of the EIR which was corrected in the Draft EIR published on September 30, 2003. No response is necessary.

**Comment 4-34**

The comment was made on an earlier draft of the EIR requesting that the word “wetland” be replaced by “marsh-like.” The Draft EIR published on September 30, 2003, was modified to reflect this global comment where applicable.

**Comment 4-35**

The comment requests that the Final EIR evaluate BASH. The Final EIR discusses BASH on page 4-168, concluding that the elimination of effluent induced overflows would reduce the hazard from existing conditions.

**Comment 4-36**

The comment was made on a draft version of the EIR which was corrected in the Draft EIR published on September 30, 2003. No response is necessary.

**COMMENT LETTER 5: COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS,  
NOVEMBER 18, 2003**

**Comment 5-1**

The comment requests that the LWRP 2020 Plan include more recycled water reuse projects including municipal irrigation. See response to Comment 6-1.

**COMMENT LETTER 6: CITY OF LANCASTER, NOVEMBER 18, 2003**

**Comment 6-1**

The comment requests that the LWRP 2020 Plan include more recycled water reuse projects including groundwater recharge and municipal irrigation. The LWRP 2020 Plan evaluated a "Groundwater Recharge" effluent management alternative and found it to be infeasible at this time. However, the LWRP 2020 Plan recommended project proposes to reuse effluent for agricultural irrigation as well as providing up to 1.5 million gallons per day (mgd) to the City of Lancaster for its proposed municipal reuse project. District No. 14 welcomes opportunities to increase recycled water use in the Antelope Valley. At this time, none of the water suppliers in the area other than the City of Lancaster have requested using recycled water to reduce demand on potable water. The City of Lancaster's proposed project will provide effluent management for approximately five percent of the total projected influent by the year 2020. No other potential users have been identified to utilize the remaining effluent. For this reason, District No. 14 has proposed to conduct agricultural reuse operations. This notwithstanding, District No. 14 will continue to look for additional recycled water reuse projects in the region.

At this time, no potential users of tertiary-treated water have been identified other than 1.5 mgd by the City of Lancaster. District No. 14 welcomes developing partnerships to productively use recycled water produced by the LWRP. The LWRP 2020 Plan proposes to reuse most of the effluent produced by the LWRP through agricultural operations that will be in compliance with the State Water Resources Control Board policies and guidelines as well as the Department of Health Services requirements promulgated in the California Code of Regulations, Title 22.



The recommended project, which was changed because of comments received on the Draft EIR, now provides for complete disinfected tertiary effluent being produced by the LWRP. This change should facilitate the development of more reuse projects in the Antelope Valley.

**COMMENT LETTER 7: CITY OF PALMDALE, NOVEMBER 7, 2003**

**Comment 7-1**

The City of Palmdale has no comments. No response is necessary.

**COMMENT LETTER 8: QUARTZ HILL WATER DISTRICT, NOVEMBER 14, 2003**

**Comment 8-1**

The comment requests that the LWRP 2020 Plan include more recycled water reuse projects including municipal irrigation. See response to comment 6-1. In addition District No. 14 in the past has and presently is working with other agencies within the Antelope Valley to develop a comprehensive recycled water plan.

The recommended project, which was changed because of comments received on the Draft EIR, now provides for complete disinfected tertiary effluent being produced by the LWRP. This change should facilitate the development of more reuse projects in the Antelope Valley.

**COMMENT LETTER 9: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS,  
NOVEMBER 13, 2003**

**Comment 9-1**

The comment states that the Draft EIR does not address Southern California Association of Governments (SCAG) policies or regional plans applicable to the project. SCAG population projections and regional management plans are specifically discussed in Section 4.13 of the Final EIR. The Final EIR does not reiterate the policies of each agency with jurisdiction in the region, which would include the cities of Lancaster and Palmdale, and the County of Los Angeles. The Final EIR does evaluate the potential effects of the project with respect to these agencies' policies and regional management plans. The Final EIR on page 4-200 discusses the relationship of the Regional Comprehensive Plan and Guide, the 2001 Regional Transportation Plan, as well as the local Air Quality Management Plan (AQMP) and other land use plans applicable to the region. Table 4.13-6 summarizes how potential impacts to environmental resources resulting from growth are mitigated through adherence with regional agency policies including SCAG's regional plans. The Final EIR identifies the project's consistency with SCAG growth forecasts. See responses to comments 9-5 through 9-11.

**Comment 9-2**

The comment requests a minimum of 45 days to review the Draft EIR. The Draft EIR was circulated on September 2, 2003, through November 18, 2003, providing over 45 days for review. See Public Notification Master Response.

**Comment 9-3**

The comment states that the Draft EIR does not address SCAG policies applicable to the project. See response to comments 9-1.

**Comment 9-4**

The comment states that the Draft EIR does not address relationships of the project to SCAG's regional plans. See response to comments 9-1.

**Comment 9-5**

The comment provides the SCAG 2001 growth forecasts for the subregion, the City of Lancaster and the City of Palmdale. The growth SCAG 2001 forecasts are slightly greater than the SCAG 2000 forecasts for the City of Lancaster shown in Table 4.13-2. However, the population projections for the District No. 14 service area utilize the SCAG 2001 forecasts and are consistent with the most recent SCAG projections. Therefore, the LWRP 2020 Plan is consistent with SCAG Policy 3.01. The project description in the Final EIR provides consistency with Policy 3.03 by notifying SCAG of the timing, financing, and location of the proposed public facilities.

**Comment 9-6**

The comment provides the SCAG policies regarding secondary effects of growth. The Final EIR addresses the secondary effects of growth in Section 4.13. Table 4.13-6 summarizes potential impacts to environmental resources and identifies regional mitigation strategies. Chapter 5 of the Final EIR describes the site screening process conducted to identify facility locations that would minimize environmental effects. Section 4.4 evaluates the project's effects to biological resources including wetland and sensitive species and provides mitigation measures where feasible to minimize impacts. Chapter 4.12 evaluates the project's potential to impact cultural resources. Chapter 4.2 evaluates potential geologic hazards and commits District No. 14 to implementing designs that are protective of public safety. The Final EIR identifies mitigation measures to minimize impacts to environmental resources. Therefore, the Final EIR is consistent with the policies 3.18, 3.20, 3.21, 3.22, and 3.23.

**Comment 9-7**

The comment describes SCAG's social equity policies. The Final EIR discusses the project's relationship with social equity in Impact 4.13-2. The Final EIR concludes that the location of the facilities was adequately screened to minimize disproportionate impacts to local communities.

**Comment 9-8**

The comment provides policies associated with the Regional Transportation Plan. The LWRP 2020 Plan does not propose transportation facilities or impact proposed transportation facilities. Therefore the LWRP 2020 Plan and LWRP 2020 Plan EIR are consistent with the highlighted SCAG policies.

**Comment 9-9**

The comment provides core SCAG policies concerning air quality protection. Section 4.8 evaluates impacts of the project to air quality. Section 4.13 discusses the project's relationship and consistency with the AQMP prepared by the Antelope Valley Air Quality Management District. Therefore, the Final EIR is consistent with the SCAG core policies on air quality.

**Comment 9-10**

The comment provides SCAG's policy on water reclamation. The LWRP 2020 Plan proposes to reuse treated effluent for agriculture and municipal reclamation projects and is therefore consistent with the identified SCAG policy.

**Comment 9-11**

The comment states that identified impacts should be mitigated. The Executive Summary of the Final EIR provides a table listing identified impacts and mitigation measures needed to minimize adverse effects of the project.

**COMMENT LETTER 10: LOS ANGELES AUDUBON SOCIETY, NOVEMBER 19, 2003**

**Comment 10-1**

The comment requests that constructed wetlands be included as a project alternative. As discussed in Chapter 6 of the LWRP 2020 Plan and Section 5.3 of the Final EIR, a constructed wetland alternative was considered but rejected since it did not meet the project objectives. After careful consideration, the LWRP 2020 Plan concluded that constructed wetlands would not avoid any impacts of the project, nor would it assist in meeting the fundamental objectives of the project. District No. 14 is not opposed to providing water to constructed wetlands in the area. However, it is not an objective of the project nor a mandate of District No. 14 to enhance wetland habitat. The LWRP 2020 Plan would not affect the existing size and management of Piute Ponds that would necessitate implementing replacement habitat. The reduction of the periodic mudflat habitat on Rosamond Dry Lake would not be mitigated by the construction of an up-land wetland. The amount of land required to provide constructed wetlands would not be an efficient use of land compared with storage reservoirs and agricultural operations and would not avoid potential impacts of land applying recycled water.

**COMMENT LETTER 11: OFFICE OF POLICY AND RESEARCH, STATE  
CLEARINGHOUSE, NOVEMBER 14, 2003**

**Comment 11-1**

The comment from the State Clearinghouse notes that the review period officially ended on November 13, 2003, 45 days after it began on September 30, 2003. No response is necessary.

**COMMENT LETTER 11A: SUNDALE MUTUAL WATER COMPANY, JANUARY 21, 2004**

**Comment 11A-1**

The comment objects to land spreading of effluent near Sundale Mutual Water District wells. The interim period of land spreading described as necessary for both Alternatives 1 and 2 (recommended project) in the Draft EIR has been removed from the project description in the Final EIR. See page 3-17 of the Final EIR. Instead of land spreading in the interim period before the storage reservoirs are complete, District No. 14 will negotiate with EAFB and the RWQCB-LR to authorize controlled overflows onto Rosamond Dry Lake. District No. 14 is working with the RWQCB-LR and EAFB to ensure that continuation of controlled effluent overflows during this period does not create a threatened nuisance condition.

LETTER 1

State of California - The Resources Agency

GRAY DAVIS, Governor



DEPARTMENT OF FISH AND GAME

http://www.dfg.ca.gov  
4949 Viewridge Avenue  
San Diego, CA 92123  
(858) 467-4201



November 12, 2003



Mr. Sagar K. Raksit  
County Sanitation Districts of Los Angeles County  
1955 Workman Mill Road  
Whittier, CA 90607-4998

**Draft Environmental Impact Report for  
Lancaster Reclamation Plant 2020 Facilities Plan  
SCH #2001021127, Los Angeles County**

Dear Mr. Raksit

The Department of Fish and Game (Department) appreciates this opportunity to comment on the Draft Environmental Impact Report (DEIR) for the above referenced proposed project relative to impacts to biological resources. The preferred project consists of a proposal to expand the Lancaster Reclamation Plant's treatment capacity by constructing activated sludge and tertiary treatment facilities, acquiring and/or leasing 4,170 acres of land for agricultural reuse operations using recycled water and the acquisition of 1,100 acres of land for the siting and construction of recycled water storage reservoirs. The proposed project is designed to eliminate overflows onto Rosamond Dry Lake and maintain freshwater habitat within Piute Ponds at their existing size

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

**Impacts to Biological Resources**

1. Mojave Ground Squirrel – Page 4-108 of the DEIR identifies areas of potentially suitable habitat for the State Threatened mohave ground squirrel (MGS) as determined by MGS biologist Philip Leitner. Mitigation measures include avoidance of occupied habitat following DFG approved MGS surveys or assuming presence of MGS without conducting surveys. Occupied habitat or assumed occupied habitat which cannot be avoided shall be mitigated for by performing compensatory land acquisition and management as approved by DFG at a ½:1 to 1:1 ratio pursuant to Section 2081 of the California Endangered Species Act.

1-1

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30/325 YOSHIDA [Signature]

- a. The Department concurs with the evaluation of project impacts to MGS and proposed mitigation measures for areas of presumed occupied MGS habitat. If conducted surveys for MGS indicate the presence of this species the Department would require a higher compensatory land acquisition mitigation ratio for incidental take as an incidental take permit condition.
2. Desert Tortoise – Impact 4.4-5 on page 4-111 of the DIER states that “it is possible that desert tortoise (DT) could be encountered during construction. Since the species is federally threatened, this would be considered a significant impact of the project.”
    - a. The DEIR fails to recognize that the DT is listed as threatened under the California Endangered Species Act and as such focused DT protocol surveys are warranted within suitable habitat within DT range as acknowledged in the DEIR. Proposed project activities which should result in take of DT would require further consultation with the Department and USFW and would require avoidance measures and/or appropriate incidental take permits.
  3. Burrowing Owl - The DIER discusses project impacts to the burrowing owl (BO), a California Species of Special Concern and under consideration for state listing. Page 4-106 states that “the local and regional occurrence of nesting owls (burrowing owls) provides the potential for on site nesting of this species.” The DEIR further concludes that the proposed project sites provides marginally suitable nesting habitat for BO and that loss of BO habitat would not be considered a significant adverse impact due to the large amount of suitable habitat for BO in the Antelope Valley.
    - a. Based on the DEIR, it is not clear to the Department how habitat suitability for BO was determined. The Department recommends WBO surveys be conducted following the Department’ recommended burrowing owl habitat assessment and survey protocol, if this has not been accomplished, to determine status of BO on and adjacent to the proposed project site. The protocol and recommended mitigation measures may be found at the following website: <http://www2.uscs.edu/scpbrg/survey.htm>.
    - b. The loss of breeding, foraging, and wintering BO habitat in the Antelope Valley should be considered a direct and cumulatively significant adverse impact under CEQA due to declines resulting primarily from habitat loss within California as evidenced by efforts to consider listing BO under the California Endangered Species Act. The Antelope Valley is the only known area within Los Angeles County where the BO has not been extirpated as a breeding bird. The assumption in the DEIR that adequate habitat within the Antelope Valley negates any obligation to mitigate for the loss of habitat for this species makes the false assumption that occupied BO habitat elsewhere in the Antelope Valley will not be developed in the future. Avoidance of occupied BO habitat and/or the acquisition and protection in perpetuity of compensatory habitat of equal or greater quality at a Department approved location and mitigation ratio should be a condition of project approval as a mitigation measure to reduce impacts to BO to less than significant levels under CEQA.

4. Nesting Birds – Habitat modification could result in noise and removal and/or disturbance of vegetation and therefore has the potential to directly impact nesting native bird species.
  - a. The applicant should be advised that migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918(50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).
  - b. Proposed project activities (including disturbances to native and non-native vegetation and man-made nesting substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).
  - c. If project activities cannot feasibly avoid the breeding bird season, the Department recommends that beginning thirty days prior to the disturbance of suitable nesting habitat the project proponent should arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 150 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys should be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys should continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work. If a protected native bird is found, the project proponent should delay all clearance/construction disturbance activities in suitable nesting habitat or within 150 feet of nesting habitat (within 500 feet for raptor nesting habitat) until August 31 or continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 150 feet of the nest (within 500 feet for raptor nests) shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. Limits of construction to avoid a nest should be established in the field with flagging and stakes or construction fencing. Construction personnel should be instructed on the sensitivity of the area. The project proponent should record the results of the recommended protective measures described above to document efforts to avoid take of native bird species.
5. Special Status Plant Species – Page 4-102 of the DIER (Impact 4.4.-1) states that “Construction of the storage reservoirs for Alternative 1 would result in the loss of alkali mariposa lily.” Mitigation measures proposed include avoidance and/or acquisition of compensation lands at a ½:1 or 1:1 ratio. Additional rare plant

surveys are proposed for additional agricultural areas which to date have not been identified.

- a. A sensitive plant survey and impact assessment including avoidance and mitigation measures should include the Hoover's eriostrium (*eriastrum hooveri*) a federally threatened species known to occur within the vicinity of the proposed project site.
- b. Habitat supporting special status plant species including alkali mariposa lily should be avoided. If avoidance is not feasible the mitigation measures and ratios for impacts to special status plant species should be approved by the Department's plant ecologist prior to project approval, especially in light of the fact that focused botanical surveys and potential impacts have not been evaluated in the DEIR for some proposed project areas which have not been identified.

### Impacts to Riparian Resources

1. Wetlands - Under the summary section on page 4-115 paragraph one of the DEIR it is stated that "The elimination of effluent-induced overflow into Rosamond Dry Lake (RDL) would cause the loss of mudflat foraging habitat that has been available for migratory waterfowl and native wildlife during the winter and spring for approximately the last 10 years" and that "since the habitat does not reflect a naturally induced wetland condition, and since it is not considered to be waters of the US or a wetland as delineated by the Corps, it is not considered to be a sensitive habitat under CEQA."
  - a. The Department does not concur with the above statement regarding habitat sensitivity of the effluent induced habitat created and maintained by the Piute Ponds overflow. The mudflat areas of RDL and associated areas between RDL and Piute Ponds are considered wetlands of the State of California and as such the loss and/or diminishment of such wetlands would be considered significant under CEQA based upon the habitat value of these areas and the Department's no net loss of wetland policy. The DEIR fails to quantify the acreages of wetlands which will be affected by dewatering resulting from the proposed project.
  - b. The Piute Ponds and associated RDL are hydrologically connected with Amargosa Creek. Any water sources directed into the creek system via natural drainages, man made drainage channels, ditches and/or impounded water bodies, i.e. Piute Ponds, etc. are considered jurisdictional waters of the State of California. The Department would require a Streambed Alteration Agreement (SAA), pursuant to Section 1600 et seq. of the Fish and Game Code, with the County Sanitation Districts prior to any direct or indirect impact to a lake or streambed, bank or channel or associated riparian habitat, including altering a water source which supports wetlands and mudflat habitat within Department jurisdiction. The Department's issuance of a SAA is considered a project subject to CEQA. To facilitate our issuance of the Agreement, the Department as a

responsible agency under CEQA may consider the local jurisdiction's (lead agency) document for the project. To minimize additional requirements by the Department under CEQA the document should fully identify the potential impacts to any lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the Agreement. The DEIR does not address impacts to jurisdictional waters of the State nor offer avoidance/mitigation measures to reduce impacts below a significant level under CEQA. Avoidance would be the environmentally preferred alternative to maintain existing hydrologic conditions supporting wetland resources associated with overflow and/seepage of the Piute Ponds.

- c. Every effort should be made to maintain the habitat values of the important migratory shorebird stopover site which is enhanced by Piute Pond overflows. The feasibility of maintaining the effluent enhanced mud flats while satisfying Edward's Air Force Base's (EAFB) goal of using RDL as an emergency landing site should be evaluated as a project alternative. Is it necessary for EAFB to use the entire RDL for emergency landing purposes? Does eliminating mudflat habitat during the critical migratory period for shorebirds conform with EAFB's Integrated Natural Resources Management Plan goals and commitments for the Base?

2. Page 4-116, paragraph states that "eliminating the mudflat habitat would 'substantially reduce the habitat of ... wildlife' and could 'restrict the ... range of a rare ... animal' which are identified CEQA thresholds of significance (CEQA Guidelines Appendix G, XVII Mandatory Findings of Significance)" and that "no measures are available to mitigate the significant impact short of creating a mudflat off of EAFB property. This would not be feasible. Therefore the impact is considered significant and unavoidable."

- a. The Department concurs with the above statement concerning unavoidable significant impacts. If the lead agency concludes that unavoidable significant impacts to biological resources will result from project approval then the lead agency must declare a Statement of Overriding Considerations (SOC) under CEQA (CEQA Guidelines Section 15093, Statement of Overriding Considerations). The Department cannot authorize alterations to Department jurisdiction resulting from an approved project based upon the Lead Agency's Certified Final EIR declaring a SOC for unavoidable significant impacts to Biological Resources. In this case the Department must act as lead agency for the purposes of CEQA compliance when issuing a SAA for the proposed project so that impacts are avoided and/or mitigated to below a significant level under CEQA.
- b. To avoid a SOC the Department recommends that adverse impacts to effluent induced mudflats be avoided during peak shorebird use periods, as determined by historic documentation and individuals familiar with shorebird use patterns of the Rosamond dry lake bed. Every available measure should be taken to



preserve the habitat quality of these mudflats and other adjacent wetlands; otherwise mitigation measures will need to be implemented to the satisfaction of the Department to create similar habitat of equal or greater quality to that which will be adversely impacted by the proposed project within the Department's jurisdiction.

3. Piute Ponds - Page 4-116 of the DEIR states that "It is the policy of District No, 14 to maintain Piute Ponds such that the value to migratory birds would not be diminished."
  - a. The DEIR needs to discuss how the biological integrity of the Piute Ponds is proposed to be maintained while at the same time proposing to eliminate treatment effluent overflow from the ponds. The Department is concerned that the elimination of overflow effluent out of Piute Ponds and associated freshwater turnover could adversely affect water quality regarding salinity, and nutrient levels within the ponds which could negatively impact freshwater habitat quality and associated values to wildlife. High water temperatures and nutrient levels are conducive to low oxygen water levels, fish die offs and avain botulism outbreaks within closed pond systems. This impact should be addressed in the EIR.

In conclusion, the Department recommends that the above concerns are addressed by the Lead Agency and conditioned as part of the project approval process.

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

Sincerely,



C. F. Raysbrook  
Regional Manager

cc: Ms. Morgan Wehtje, Camarillo; Mr. Scott Harris, Mission Hills  
Ms. Mary Meyer, Ojai; Ms. Betty Courtney, Newhall; CFR-Chron; HCP-Chron  
Department of Fish and Game

Scott Morgan  
State Clearinghouse, Sacramento

SPH:sph  
spharris\Lancaster WT Plant DEIR.doc

LETTER 2

DEPARTMENT OF WATER RESOURCES

116 NINTH STREET, P.O. BOX 942836  
SACRAMENTO, CA 94236-0001  
(916) 653-5791

DEC 4 2003



Mr. Sagar K. Raksit, Supervising Engineer  
Finance Management Department  
Los Angeles County Sanitation District  
Post Office Box 4998  
Whittier, California 90607-4998

SCH #2001021127, Draft Environmental Impact Report for Lancaster Water  
Reclamation Plant 2020 Facilities Plan, September 2003,  
Los Angeles County

Dear Mr. Raksit:

The Division of Safety of Dams has reviewed the Draft Environmental Impact  
Report for the Lancaster Water Reclamation Plant 2020 Facilities Plan.

Based on the information provided, we could not determine if the 16 effluent  
reservoirs are under the State jurisdiction for safety. Section 6025.5 of the California  
Water Code defines that the State regulations and supervisions of safety of dams shall  
not be applicable to waste water treatment and storage ponds constructed as a part of  
a waste water control facility if certain restrictions are met. The restrictions are: 1)  
dams have a maximum height of 15 feet or less (a vertical distance measured from the  
lowest point at the downstream toe to the maximum water storage elevation), 2) the  
city, county, district, or other agency which operates the waste water control facility  
adopts a resolution to define that the ponds have been constructed and operated to  
standards adequate to protect life and property, 3) dams are not across a stream  
channel or watercourse.

If the proposed project is jurisdictional, a construction application together with  
plans and specifications must be filed with the Division of Safety of Dams. All dam  
safety related issues must be resolved prior to approval of the application, and the work  
must be performed under the supervision of a civil engineer registered in California.  
The Acting Design Engineering Branch Chief is responsible for application approval  
process and can be reached at (916) 227-4660.

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David A. Gutierrez

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Page Two

If you have any questions please contact Office Engineer Chuck Wong at (916) 227-4601 or Regional Engineer Mutaz Mihyar at (916) 227-4600.

Sincerely,

*for*   
David A. Gutierrez, Acting Chief  
Division of Safety of Dams

cc: Ms. Nadell Gayou  
Resources Agency Project Coordinator  
Environmental Review Section, DPLA  
901 P Street  
Sacramento, California 95814



# California Regional Water Quality Control Board



## Lahontan Region

Terry Tamminen  
Secretary for  
Environmental  
Protection

Arnold Schwarzenegger  
Governor

Victorville Office  
15428 Civic Drive, Suite 100, Victorville, California 92392  
(760) 241-6583 • Fax (760) 241-7308  
<http://www.swrcb.ca.gov/rwqcb6>

31-370.40.4A

November 18, 2003

WDID NO. 6B190107017

Sagar K. Raksit, Supervising Engineer  
County Sanitation Districts of Los Angeles County  
P.O. Box 4998  
Whittier, CA 90607-5422

### COMMENTS ON SEPTEMBER 2003 DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR LANCASTER WATER RECLAMATION PLANT (LWRP) 2020 FACILITIES PLAN - LOS ANGELES COUNTY SANITATION DISTRICT NO. 14 (DISTRICT), LANCASTER, LOS ANGELES COUNTY

Regional Water Quality Control Board staff (Regional Board staff) has reviewed your September 2003 DEIR for the LWRP, 2020 Facilities Plan, submitted with the District's letter dated September 30, 2003. Our review of the DEIR indicates that it is deficient in many areas, and should be revised or supplemented with additional information. Moreover, the District has not evaluated possible mitigation measures for some of impacts identified in the DEIR.

3-1

Board staff has a number of significant comments as presented in the body of this letter. Additionally, we have a number of less significant comments that are provided in the enclosure to this letter.

#### SIGNIFICANT COMMENTS

1. Page ES-4. The District in the DEIR states that: "The Regional Water Quality Control Board, Lahontan Region (RWQCB-LR) has mandated that effluent induced overflows to Rosamond Dry Lake be eliminated by August 25, 2005." This statement is blatantly incorrect. Provision II.B.4. of Order No. R6V-2002-053 states: "By August 25, 2005 the Discharger shall complete a project to eliminate the threatened nuisance condition created by overflows from Paiute Ponds to Rosamond Dry Lake..."

3-2

2. Page ES-5. Alternative 1 includes the continued use of the existing oxidation ponds. The District does not evaluate the potential to degrade or pollute groundwater from the continued use of these units. It is impossible to compare the potential environmental effects of proposed alternatives (building a 26 MGD conventional activated sludge facility) to retaining the existing facility without understanding the environmental effects of the existing facility.

3-3

*Handwritten:* info Raksit

California Environmental Protection Agency

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J.F. STAHL

Stephen R. Maguire

3. Table ES-2 and Table 3-7. The text of the DEIR does not contain sufficient information to justify groundwater quality impacts stated in these tables. The District, in the DEIR, does not provide any information on the leakage rate from the proposed storage reservoirs and existing oxidation ponds. Further, the District does not quantify the transport of nitrogen or any other contaminants to groundwater from land spreading disposal alternatives. The only significant discussion of the potential impact to groundwater from either the storage reservoirs or from land spreading is on pages 4-66 and 4-67 (the DEIR does not contain any discussion of the potential impacts from the existing oxidation ponds). On page 4-66 of the DEIR the District proposes mitigation to “minimize the potential for groundwater pollution” from the storage reservoirs. On page 4-67 of the DEIR the District claims that “Violation of the RWQCB-LR Basin Plan Anti-Degradation Policy would constitute a significant impact of the project” when evaluating the potential of groundwater impacts from the land spreading operation. This description totally mischaracterizes the referenced policy. Furthermore, the District attempts to compare a pollution threshold for the storage ponds with a no degradation threshold for the land spreading operation; a comparison of apples with oranges.

3-4

Therefore, there is no basis for the District to state in Table ES-2 that Alternatives 3 and 4 will have more of a potential impact to groundwater than Alternatives 1 and 2. A more accurate evaluation of all alternatives would be to quantify the potential for discharge of contaminants to groundwater associated with: the continued use of the oxidation ponds, the storage ponds, the agricultural operation and the land spreading operation. This information could then be compared against both the degradation objective and the pollution standard. Additionally, the State’s “Anti-Degradation Policy” provides criteria that allows the Regional Board to permit degradation.

4. Page ES-9. The District claims in the DEIR that all alternatives will have a significant and unavoidable impact by eliminating the mudflats on Rosamond Dry Lake created by existing overflows from Paiute Ponds. However, the DEIR does not attempt to evaluate mitigation measures such as retaining low volume flows to this area that would sustain some if not all of the mudflat habitat without creating the significant ponding on Rosamond Dry Lake that contributes to the threatened nuisance condition.

3-5

5. Page ES-10. The District, in the section on Hydrology and Water Quality, claim that the potential impacts to groundwater from the storage reservoirs can be mitigated to less than significant levels under Alternatives 1 and 2. However, this impact is the pollution of the groundwater. The District in the DEIR fails to evaluate the potential for degradation of groundwater from the storage reservoirs; something the District claims is an unavoidable significant impact from the land spreading operation. Unless the District is prepared to build the storage reservoirs with double liners of extremely low permeability and provide a leachate collection system between the liners, the possibility of groundwater degradation from the storage reservoirs cannot be discounted.

3-6

6. Table ES-4, Page ES-19. The District indicates in this table that the water quality in Paiute Ponds could be impacted by the elimination of effluent-induced overflows. The District proposes as mitigation for this potential impact that it "conduct a water quality assessment of Paiute Ponds to determine potential water quality impacts." However, the District does not indicate the desired water quality that must be maintained in order to prevent a potential adverse impact. Furthermore, the District proposes to mitigate any potential adverse impact by implementing flushing flows or a circulation system. Both of these mitigation measures can have significant adverse impacts. The District does not evaluate these impacts to determine if any are unavoidable. The District does not propose higher levels of treatment of the wastewater that it will continue to discharge to Paiute Ponds to mitigate the creation of a significant adverse impact associated with the project. 3-7
7. Table ES-4, Page ES-24. Under public health, the District proposes to mitigate the potential for exposure to recycled wastewater by constructing windbreaks of planted trees. However, the District fails to adequately characterize the potential for this exposure by evaluating the wind conditions. What is the maximum wind speed that would allow for spray irrigation without risk of exposure? Based on meteorological records, how many days each year would conditions prevent spray irrigation? Could the District sustain crops under the proposed operating conditions? Would flood irrigation provide a more reliable mitigation measure? 3-8

If you have any policy questions concerning this letter, please contact me at 530/542-5412. If you have technical questions, please contact Mike Plaziak, Senior Engineering Geologist at (760) 241-7404 in our Victorville office.

Sincerely,



HAROLD J. SINGER  
EXECUTIVE OFFICER

Enclosure

cc (with enclosure): Regional Board Members  
Senator William "Pete" Knight  
Assemblywoman Sharon Runner  
General Wilbert D. Person Jr., Major General, USAF, Edwards Air Force Base  
Michael D. Antonovich, Supervisor, Los Angeles County  
Frank C. Roberts, Mayor, City of Lancaster  
James C. Ledford, Mayor, City of Palmdale

TS/LACSD 14 DEIR comments 10-17-03

1. Page 2-12, Tables 2-7 and 2-8. Both of these tables list the range and average nitrate nitrogen concentration of treated wastewater from each treatment facility. However, Table 2-7 lists nitrate nitrogen as mg/L -N while Table 2-8 lists nitrate nitrogen as mg/L making comparisons impossible. 3-9
  
2. Page 3-11 and Figure 3-6. The narrative at the top of page 3-11 fails to disclose that a significant portion of the wastewater flow under Alternatives 3 and 4 will be either land spread or applied to crops at levels (water and nitrogen) above that needed by the crop. Additionally, Figure 3-6 fails to identify that both agricultural reuse and land application can result in the discharge of contaminants to groundwater. 3-10
  
3. Page 3-13. The District identifies the need for retention basins and tail water basins at the farm operation. However, the District does not evaluate the potential environmental impacts of these basins. Potential impacts include: groundwater degradation, groundwater pollution and breeding areas for mosquitoes. 3-11
  
4. Page 3-15. The District acknowledges that it will land spread wastewater under Alternatives 1 and 2 for "an interim period" until the storage reservoirs are constructed. However, this interim period is not quantified. The District does not evaluate the potential environmental impacts associated with land spreading of wastewater during this interim period in its analysis of Alternatives 1 and 2. 3-12
  
5. Page 3-21. Section 3.4 Environmentally Superior Alternative  

As discussed in comment number 3 in the body of the letter, the District fails to disclose that the storage reservoirs proposed in Alternatives 1 and 2 could result in a degradation of the groundwater. Without a commitment to build storage reservoirs that do not leak, the District is not justified in indicating that Alternatives 1 and 2 are environmentally superior to Alternatives 3 and 4 which likely will result in some groundwater degradation.

3-13
  
6. Pages 4-46 through 4-47. Impact 4.2-3 Utilizing Treated Effluent for Irrigation Could Increase Soil Salinity over the Long Term and Impact Agricultural Productivity  

No discussion of nitrate impacts is included in the DEIR. The District should consider the potential for salts to accumulate and migrate below the root zone to groundwater. The District should also address the predominant moisture flux mechanism at work under the crops: plug flow or bypass flow? Is there a potential for over application of irrigation water to induce transport of salts via bypass flow? If so, how will the transport of salts below the root zone be mitigated? A discussion of nitrate impacts and mitigation measures needs to be included in the Environmental Impact Report (EIR).

3-14

7. Pages 4-57, 4-62 and 4-63. The District identifies stormwater runoff from construction activities and operation of the wastewater treatment facility as potential adverse impacts. The District then indicates that compliance with NPDES construction and industrial facilities would eliminate the need to mitigate for this potential impact. However, on page 1-6 of the DEIR, the District claims that its wastewater discharge to Piute Ponds is not subject to an NPDES permit based on a recent United States Corps of Engineers determination that Amargosa Creek is not a Water of the United States. The District cannot on one hand claim its wastewater discharge is not subject to an NPDES permit and then indicate that compliance with a required NPDES permit will eliminate the need to mitigate for the potential that stormwater will carry contaminants associated with construction or wastewater treatment operations to surface waters.

3-15

8. Pages 4-65 through 4-66. Impact 4.3-4 Effluent Water Infiltrating into the Groundwater from Storage Reservoirs Could Degrade Groundwater Quality

The District indicates that the project design will include an engineered liner with appropriate specifications. However, the District does not indicate the exact nature of this liner. As mentioned in other comments, the District indicates that the storage reservoirs will not result in pollution of the groundwater. However, some groundwater degradation will occur unless the District proposes double liners and leachate collection systems. It is unclear from the project description whether the District intends to provide such a liner. Contrary to implications in the DEIR, the Regional Board cannot specify a liner design: it can establish water quality performance standards that must be achieved in groundwaters. Unless the District proposes and justifies some level of degradation of groundwater quality, the Regional Board may have no alternative but to preclude any groundwater degradation.

3-16

Therefore, the District in the DEIR must clearly describe the proposed liner and determine the volume and quality of wastewater that will reach groundwater. Additionally, the DEIR must quantify how much degradation is expected (both levels and extent) and why such degradation is in the best interests of the people of the state of California. This analysis is needed so that the Regional Board can determine if the proposed discharge of waste complies with State Water Resources Control Board Resolution No. 68-16, Statement of Policy with Respect to Maintaining High Quality of Water in California. The DEIR should evaluate different liner alternatives and the degradation expected from implementation of each alternative.

9. Page 4-66. The District indicates that it conducted a subsurface investigation of the effects of its discharge on local groundwater and concluded that no significant adverse effects on groundwater had occurred. The Regional Board believes that it is premature to reach such a conclusion. The Regional Board has required the District to significantly expand its groundwater monitoring network that will either verify that the conclusion of the initial evaluation is justified or that there have been adverse effects from on-going operations.

3-17



10. Pages 4-66 through 4-71. Impact 4.3-5 Effluent Water Infiltrating into Groundwater from Agricultural Operations and Land Application Operations Could Degrade Groundwater Quality

The District has not provided any information on the crop irrigation alternative that quantifies the total nitrogen proposed to be applied, how the farm will be operated to ensure that degradation of groundwater will not occur and how both the farm operation and groundwater will be monitored. Even with an adequate Farm Management Plan, there is a potential for discharges of waste, especially nitrogen, to groundwater that could effect water quality. Specific monitoring and mitigation measures must be proposed.

3-18

The DEIR discusses a nitrate concentration of 2.69 mg/L of the applied wastewater which has the potential of infiltration into the local groundwater. This nitrogen loading is in error. There are many other forms of nitrogen, such as ammonia, nitrite and Kjeldahl nitrogen, which are normally present in the effluent. All of these forms of nitrogen are potentially available for conversion to more mobile forms of nitrogen (nitrate) and could migrate to the groundwater if not used by the crop. Information from the Districts' Self Monitoring Reports (SMR) indicate that the effluent contains annual average total nitrogen concentrations of up to 33.2 mg/L (2002 Annual SMR). Impacts from potential infiltration of effluent containing a total nitrogen concentration of 33.2 mg/L need to be discussed in the EIR, along with appropriate mitigation measures.

11. Pages 4-75 through 4-78. Impact 4.3-8 Water Quality at Piute Ponds Could be Impacted by the Elimination of Effluent-Induced Overflows

Impacts of salt build up on receptors need to be identified along with mitigation measures. The DEIR indicates that the volume of flushing flows is not determined at this time. Without this information, the impacts cannot be identified and mitigated.

3-19

12. Pages 4-113 through 4-116. Impact 4.4-8 The Elimination of Effluent-Induced Overflows onto Rosamond Dry Lake for each Alternative would Cause Loss of Mudflat Habitat

In the Regional Board staff comment letter dated January 16, 2003 responding to the Notice of Preparation for the DEIR, we stated the District needs to address the potential loss of wetlands issue. It is stated that mitigation measures are not available for this impact and that the impact is unavoidable. However, the District fails to evaluate controlled overflows to maintain the wetland/mudflat area without causing a nuisance condition on Rosamond Dry Lake. The DEIR is deficient in that it fails to evaluate this and other possible mitigation measures.

3-20

13. Page 4-157 through 4-158 Impact 4.9-1. Operation of the Treatment and Storage Facilities Would Increase the Demand for Disposal Capacity for Biosolids

Currently biosolids are exported to the San Joaquin Composting Facility (SJCF). The project would increase the mass of biosolids exported by approximately 1,450 tons per

3-21

year. It is assumed that the increased tonnage of biosolids as a result of the project would continue to be exported to the SJCF. However, the District should explore the validity of this assumption and discuss alternatives to this method of biosolids management, including a discussion of potential impacts and mitigations for the impacts of each identified alternative.

**3-21**

**(cont'd)**

LACSD 14 DEIR comments enclosure

LETTER 4



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS AIR FORCE FLIGHT TEST CENTER (AFFTC)  
EDWARDS AIR FORCE BASE, CALIFORNIA

14 November 2003

AFFTC/CV  
1 S. Rosamond Blvd  
Edwards AFB CA 93524-1031

Mr. Sagar Raksit  
Supervising Engineer  
County Sanitation Districts of Los Angeles County  
P. O. Box 4998  
Whittier CA 90607-4998

Dear Mr. Raksit

Thank you for the opportunity to review the Lancaster Water Reclamation Plant 2020 Facilities Plan and Draft Environmental Impact Report (DEIR). As stated previously in our comments dated September 4, 2003 (Attachment 1) on the Administrative Draft EIR review, the Air Force Flight Test Center (AFFTC) is extremely concerned about the contents of the DEIR especially as it relates to existing conditions on Edwards Air Force Base (AFB). Throughout the document, reference is made to the mudflat habitat between Piute Ponds and Rosamond Dry Lake. This habitat has been in existence as long as the shoreline and the dry lake have existed and is found in areas other than between Piute and Rosamond. The position of the AFFTC is that there is no loss of waterfowl or shorebird habitat and therefore all findings of significance and/or over-riding considerations under CEQA based on this conclusion are in error (e.g., page ES-10 of the Facilities Plan). Although Los Angeles County and the California Department of Fish and Game consider the Piute Pond Complex significant to migratory birds, nothing in the Facilities Plan and DEIR would result in impacts to the Piute Ponds area such that those impacts would require a Finding of Over-Riding Consideration. The District's continued noncompliance with the Lahontan Board Order should not be the catalyst for addressing impacts to such habitat. The AFFTC does not intend to permit continued overflow and the resulting Board Order violation in order to sustain an artificial condition that was the direct result of the District's failure to abate the nuisance condition caused by such overflow\*.

4-1

4-2

Because many of our comments apply to both the Facilities Plan and the DEIR, we have chosen not to repeat the comments under each document, but have delineated our comment/concern one time only. Comments identified with an asterisk (\*) were provided in our September 3, 2003 comment letter on the Administrative Draft EIR.

Page ES-2 (Facilities Plan), Lancaster Water Reclamation Plant, paragraph 2: control of effluent discharge into the Impoundment Area as identified in the 1991 agreement is specifically the sole

4-3

and exclusive responsibility of the Air Force. The Facilities Plan changes that control by assuming annual discharge of effluent into the Impoundment Area. This is inconsistent with the 1991 agreement, which only allows flooding of these areas at Air Force discretion. The Facilities Plan must provide for the disposal of the effluent by means other than the Impoundment Area.

ES-4, Maintenance of Piute Ponds (Facilities Plan): while we acknowledge that the District has committed itself to maintaining Piute Ponds, we recognize that the historical size of Piute Ponds, as established in the 1981 Letter of Agreement, is 200 acres\*. We, therefore, will stand by the original agreement of support and expect the District to maintain 200 acres in future years upon implementation of your Facilities Plan.

\*ES-15, Maintenance of Piute Ponds (Facilities Plan): "Providing for periodic flushing of the ponds" – as discussed in the DEIR, this will only require mitigation when and if this becomes an issue.

\*Page 1-3, paragraph 1 (Facilities Plan): "Members of local duck hunting clubs use these [Piute Ponds/Impoundment Area] for hunting" – see page 4-11 of the DEIR for correct information.

Page 1-7, Maintenance of Piute Ponds (Facilities Plan): Piute Ponds has not been designated as a jurisdictional wetlands. Sentence 3 is misleading.

Page 3-6, paragraph 1 (Facilities Plan): as the landowner of Piute Ponds, changes to the required quality standards should not be ignored until a study can be conducted. The standards should be met.

Page 7-11, EAFB Impact (Facilities Plan): This section has many mistakes and misrepresents our operational impacts with regard to our low-level routes and airspace. The potential Bird-Aircraft Strike Hazard (BASH) impacts are clearly depicted in the attached map and must be reflected in the EAFB impact section of this document. For example: We would agree that the least desirable area (from a BASH perspective) is Area 4 (where we can fly down to the ground surface). Areas 1, 2, and 3 are all underneath a low-level route (VR 1206) that allows flight activity down to 200 feet above ground level. Lastly, Area 5 would be most desirable, as no significant low-level routes are directly above this study area.

Page ES-4, paragraph 1, line 4 (DEIR): note, the operational changes are only temporary and will be modified back to the original agreements upon implementation of the Facilities Plan.

Page 3-17, Management of Piute Ponds, line 9 (DEIR): The District is not required to maintain the wildlife and recreational uses of the Impoundment Area (not to be confused with the infrastructure maintenance requirements as outlined in the 1991 agreement).

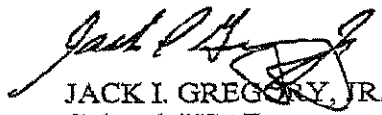
\*Page 3-18, first full paragraph (DEIR): This section is repeating the language from the Waste Discharge Requirements (Board Order) calling for District 14 to limit their discharge of effluent to Piute Ponds during and after a storm event to an amount of effluent equal to the evaporation rate from Piute Ponds. Following construction of this project, any discharge of effluent to Piute

Ponds, which would contribute to overflow, should be stopped until the holding capacity of the ponds is such that they can receive effluent without either storm induced or effluent overflow. The new storage and evaporation capacity should eliminate the necessity for discharge to Piute Ponds when they are full.

\*Page 4-89, Table 4.4-2, Western snowy plover, and page 4-92 (DEIR): delete reference as a special species throughout the document. The only sensitive species habitat of concern is located on the coast, which is not impacted by this project.

\*Page 4-113, Impact 4.4-8: see comment in opening paragraph of this letter (DEIR). The elimination of effluent induced overflows on Rosamond Dry Lake for each alternative would cause loss of mudflat habitat. Further, this is presented as a "significant, unavoidable" impact under CEQA. We disagree. The natural mudflat area around Rosamond Dry Lake will not be affected by this project. Overflow of effluent by the District in violation of the Board Order for many years cannot be used to assert that such harmful behavior should be allowed to continue merely because if it does not, some area of the artificially created condition may cease to exist. If the District is concerned with maintenance of similar areas, their project should be designed so as to create and maintain similar areas at the new project location. Unauthorized overflow to Rosamond Dry Lake cannot be permitted to continue and thereby perpetuate the harmful condition existing for the AFFTC. Such overflow continues to constitute a nuisance condition directly impacting the availability of the lakebed surface for military/defense/emergency operations. The District cannot be allowed to present this erroneous assertion as a basis for continuing violation of and consequent non-resolution of its effluent management problem.

If you have any questions regarding the above, please contact Wendy Waiwood, our project lead, at 661-277-3837.

  
JACK I. GREGORY, JR.  
Colonel, USAF  
Vice Commander

2 Attachments

1. 3 September 2003 Letter
2. Map

Attachment 1:



**DEPARTMENT OF THE AIR FORCE**  
HEADQUARTERS AIR FORCE FLIGHT TEST CENTER (AFFTC)  
EDWARDS AIR FORCE BASE, CALIFORNIA

4 SEP 2003

AFFTC/XPX  
1 S. Rosamond Blvd  
Edwards AFB CA 93524-1036

Mr. Sagar Raksit  
Supervising Engineer  
County Sanitation Districts of Los Angeles County  
P. O. Box 4998  
Whittier CA 90607-4998

Dear Mr. Raksit:

Thank you for the opportunity to review the Administrative Draft 2 for the Lancaster Water Reclamation Plant 2020 Facilities Plan Environmental Impact Report (EIR). The Air Force Flight Test Center (AFFTC) is extremely concerned about the contents of the document especially as it relates to existing conditions on Edwards Air Force Base (AFB). Throughout the document, reference is made to the mudflat habitat between Piute Ponds and Rosamond Dry Lake. This habitat has been in existence as long as the shoreline and the dry lake have existed and is found in areas other than between Piute and Rosamond. The District's continued noncompliance with the Lahontan Board Order should not be the catalyst for addressing impacts to such habitat. The AFFTC does not intend to permit continued overflow and Board Order violation in order to sustain an artificial condition that was the direct result of the District's failure to abate the nuisance condition caused by such overflow.

We are equally concerned about the detailed description of biological resources on Edwards AFB. Since no alternative includes changes to existing management agreements and the District has concluded that an environmental impact statement is not necessary, it is therefore not appropriate to include such extensive details regarding such resources in this document. We request that this be edited to address only those very limited resources and the similarly limited impact to those resources, that are directly of concern for the proposed alternatives being assessed.

Our other comments are as follows:

Global: the short turnaround time for this administrative draft did not afford us adequate time to review the alternatives for impacts to AFFTC operations. This will be accomplished during the public review process.

Global: the position of the AFFTC is that there is no loss of waterfowl or shorebird habitat and therefore all findings of significance and/or over-riding considerations under CEQA based on this conclusion are in error. Although Los Angeles County and the California Department of Fish and Game consider the Piute Pond Complex significant to migratory birds, nothing in the 2020 Plan and EIR would result in impacts to the Piute Ponds area such that those impacts would require a Finding of Over-Riding Consideration.

Global: regarding the 15 square mile area identified for agriculture/spray fields: The area delineated throughout the document is also an area being considered by Cal Trans for the construction of the Lancaster Loop, creating a divided highway extending east from Hwy 14 at Ave. D to ultimately connect with Hwy 138 in the vicinity of Littlerock/Pearblossom. Suggest coordination with Cal Trans to ensure any impacts are considered/addressed.

Page 1-3, Section 1.2, para 2, sentence 7: delete "and the adjacent impoundments"; the adjacent impoundments are not maintained as marsh-like habitat, but allowed to dry up to ensure minimal marsh-like vegetative growth.

Page 1-5, Section 1.4, para 2, sentence 4: Memorandum of Understanding is incorrect. The document is a Letter of Agreement. This correction also needs to be made on page 2-1, para 3.

Page 2-3, Section 2.3, para 2: while we acknowledge that the District has committed itself to maintaining Piute Ponds, we recognize that the historical size of Piute Ponds, as established in the 1981 Letter of Agreement, is no more than 200 acres. Suggest that reference to the size of Piute Ponds be either unstated or the agreed upon 200 acres. Additionally, the AFFTC commitment to your support of greater than 200 acres is subject to AFFTC internal review and decision. We will provide a final determination regarding this during the public review process.

Page 3-15, Section 3.2, para 2 under Management of Piute Ponds, sentence 1: District 14 is committing 95 MG annually for the "impoundment area". Inserting this as part of the 2020 Facilities Plan has not been coordinated with the AFFTC. This area was created in 1991 to alleviate the unauthorized overflow to Rosamond Dry Lake. Because this commitment constitutes an addition to the 1991 Memorandum of Agreement, the AFFTC must review this internally prior to decision. We will provide a final determination regarding this during the public review process.

Page 3-16, Section 3.2, para 2 under Peak Flow Management, sentence 4: This section is repeating the language from the Waste Discharge Requirements (Board Order) calling for District 14 to limit their discharge of effluent to Piute Ponds during and after a storm event to an amount of effluent equal to the evaporation rate from Piute Ponds. Following construction of this project, any discharge of effluent to Piute Ponds, which would contribute to overflow, should be stopped until the holding capacity of the ponds is such that they can receive effluent without either storm induced or effluent overflow. The new storage and evaporation capacity should eliminate the necessity for discharge to Piute Ponds when they are full.

Page 4-11, Section 4.1.1, para 1 under Piute Ponds and Impoundment Areas: delete sentences 2 and 3. This information is incorrect.

Page 4-81, Section 4.4.1, para 4 under Wildlife of Piute Ponds and Rosamond Dry Lake: delete entire paragraph. As identified in our previous comment regarding mudflat habitat, this paragraph is based on the same inaccurate assumption.

Page 4-83, Section 4.4.1, para 4 under Wildlife Outside of Piute Ponds, sentence 1: Correct "wetland" to "marsh-like", there are no jurisdictional wetlands within the study area

Page 4-87, Table 4.4-2, Western snowy plover: delete reference as a special species throughout the document. The only sensitive species habitat of concern is located on the coast which is not impacted by this project.

Page 4-91, Section 4.4.1, para 1 under Wetlands and Waters of the United States Within the Assessment Area: While this EIR acknowledges that "the entire Amargosa Creek watershed is not considered a water of the US as defined in the CWA", it refers to wetlands without making any distinction as to "jurisdictional" wetlands as regulated under the CWA. It is equally valid to state that this area does not constitute jurisdictional wetlands under the CWA.

Page 4-110 and 4-111, Section 4.4.1, Impact 4.4-7: delete impact in its entirety. This is speculative at best. Our research has not revealed its existence on Edwards AFB.

Page 4-111, Impact 4.4-8: see comment in opening paragraph of this letter. The elimination of effluent induced overflows on Rosamond Dry Lake for each alternative would cause loss of mudflat habitat. Further, this is presented as a "significant, unavoidable" impact under CEQA. We disagree. The natural mudflat area around Rosamond Dry Lake will not be affected by this project. Overflow of effluent by the District in violation of the Board Order for many years cannot be used to assert that such harmful behavior should be allowed to continue merely because if it does not, some area of the artificially created condition may cease to exist. If the District is concerned with maintenance of similar areas, their project should be designed so as to create and maintain similar areas at the new project location. Unauthorized overflow to Rosamond Dry Lake cannot be permitted to continue and thereby perpetuate the harmful condition existing for the AFFTC. Such overflow continues to constitute a nuisance condition directly impacting the availability of the lakebed surface for military/defense/emergency operations. The District cannot be allowed to present this erroneous assertion as a basis for continuing violation of and consequent non-resolution of its effluent management problem.

Page 4-114, Section 4.4, para 2: delete "and Edwards AFB", this is an incorrect statement.

Page 4-166, Section 4.11.2, para 1 under Bird Air Strike Hazard (BASH), sentence 4: document delineates bird airstrike statistics from 1982-1998, however the study referenced is dated 1991. Therefore either the 1998 date or the 1991 date is incorrect.

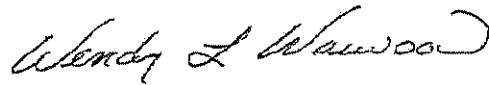


Page 4-197, Table 4.13-6, Biological Resources: correct "wetland" to "marsh-like". There are no jurisdictional wetlands on Edwards AFB. ]

Page 4-201, Section 4.14: the incremental increase of BASH due to the additional surface waters resulting from this project should be addressed. ]

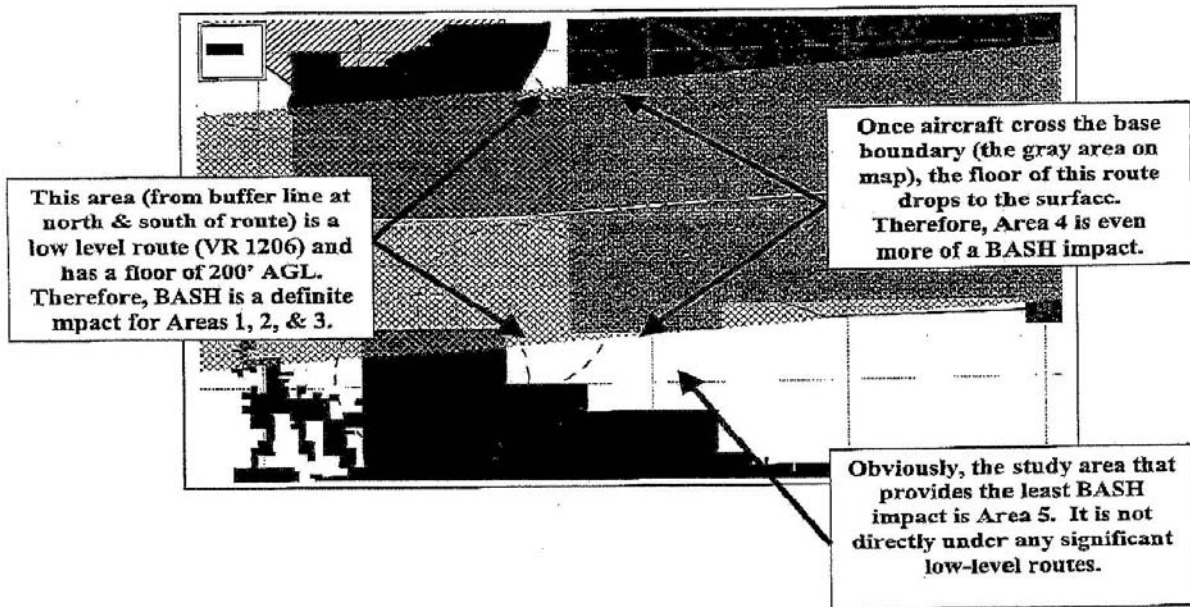
Chapter 5: we did not receive a copy of this entire chapter so no review could be conducted. ]

If you have any questions regarding the above, I can be reached at 661-277-3837.



WENDY L. WAIWOOD  
Chief, Plans and Policies Division

Attachment 2



LETTER 5



COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS

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P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE: W-0

LAMES A. NOYER, Director

November 18, 2003

Mr. Sagar Raksit  
County Sanitation Districts  
of Los Angeles County  
1955 Workman Mill Road  
Whittier, CA 90601

Dear Mr. Raksit:

**LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40, ANTELOPE VALLEY  
LANCASTER WATER RECLAMATION PLANT 2020 FACILITIES PLAN  
DRAFT ENVIRONMENTAL IMPACT REPORT**

We have reviewed the Los Angeles County Sanitation Districts' Lancaster Water Reclamation Plant 2020 Facilities Plan and Draft Environmental Impact Report and offer the following comments.

Because of the rapid population growth in the Antelope Valley, the demands for water will likely increase significantly by 2020. The current sources of supply, groundwater, and surface water from the State Water Project are already being utilized. We would like to see more emphasis in your plan on recycled water use in the Antelope Valley.

In your report, you have stated that since municipal reuse would not reduce effluent-induced overflows from Piute Ponds to Rosamond Dry Lake by August 25, 2005, and that you have not looked at a municipal water reuse "as a feasible effluent management alternative." While municipal reuse may not meet your short-term goals, we believe that it is worthwhile to explore recycled water as a long-term alternative to better meet the Antelope Valley's long-term water supply needs and to more efficiently use existing local water resources.

5-1

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Mr. Sagar Raksit  
November 18, 2003  
Page 2

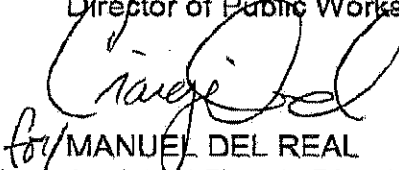
We understand that a recycled water alternative would involve further expansion of your facilities and that a separate distribution system would need to be constructed. We request that an option be presented in your plan that would outline details of a system that would maximize use of recycled water as a water resource to be used in for potential grey water customers.

With ever increasing demand on our water supplies in the Antelope Valley, we believe that it is essential to consider the utilization of all existing local resources. Recycled water is an excellent water resource and should be a key component for water conservation efforts. While we recognize that all details for a future recycled water system may not be known at this time and that further cooperation between local agencies will be necessary, we believe that it is important to include the discussion of alternative methods in your plan. We can not afford to ignore this important resource.

If you have any questions, please contact Mr. Craig David at (661) 942-1157, Extension 237.

Very truly yours,

JAMES A. NOYES  
Director of Public Works

  
for MANUEL DEL REAL  
Assistant Deputy Director  
Waterworks and Sewer Maintenance Division

CD:lb  
WW3572

# City of Lancaster

44933 North Fern Avenue  
Lancaster, California 93534-2461  
661-723-6000



October 28, 2003

Mr. Sagar K. Raksit, Supervising Engineer  
County Sanitation Districts of Los Angeles County  
P.O. Box 4998  
Whittier, CA 90607-4998

Frank C. Roberts  
Mayor

Bishop Henry W. Hearn  
Vice Mayor

Jim Jeffra  
Council Member

Ed Sileo  
Council Member

Andrew D. Visokey  
Council Member

James C. Gilley  
City Manager

Dear Mr. Raksit:

The City of Lancaster appreciates the investigations and findings offered by County Sanitation District 14 as reported in the Draft Environmental Impact Report and Draft Facilities Plan for the Lancaster Water Reclamation Plant 2020. We are especially appreciative of the proposal included therein to use a portion of the tertiary-treated water for landscape irrigation within the City of Lancaster. We are moving forward with our planning to implement such a program.

Nevertheless, we are concerned about the long-term availability of adequate water supply for the Antelope Valley. We believe that it is important that every opportunity be pursued to assure beneficial use of all water resources in the valley, including treated wastewater.

The Draft EIR and Facilities Plan identify several options for dealing with the increased wastewater expected within the District 14 service area in upcoming years. Reuse options such as municipal landscape irrigation and groundwater recharge appear to offer excellent opportunities to recycle all of the treated effluent that is not needed to maintain Piute Ponds. Further, it would appear that the Ponds would benefit if recharged by highly treated effluent.

Whereas we understand that action must be taken by District 14 before August 25, 2005, it is our opinion that the Antelope Valley would best benefit from a plan that is focused on much greater reuse of the effluent. Perhaps both objectives can be achieved by developing a phased program that addresses not only the objective of environmentally acceptable and authorized discharge from the Lancaster WRF to Piute Ponds and Rosamond Dry Lake, but also on the beneficial use of the treated water to assist in meeting the future water supply needs of the region.

Sincerely,

James R. Williams, PE  
Director of Public Works

cc: Brian Ludicke, Director of Community Development

OCT 30 '03 AM 10:17

DOC #

296548

Raksit S.

LETTER 7



PALMDALE  
a place to call home

November 7, 2003

JAMES C. LEDFORD, JR.  
Mayor

MIKE DISPENZA  
Mayor Pro Tem

RICHARD J. LOA  
Councilmember

JAMES A. "JIM" ROOT  
Councilmember

RICHARD H. "RICK" NORRIS  
Councilmember

Mr. Sagar Raksit  
County Sanitation Districts of L.A. County  
P.O. Box 4998  
Whittier, CA 90607-4998

**RE: Draft Environmental Impact Report (EIR) for Lancaster Water Reclamation Plant 2020 Facilities Plan**

Dear Mr. Raksit:

This is in reference to your letter dated September 30, 2003, regarding the above-referenced Draft EIR. Staff has reviewed the document and has no comments at this time.

We thank you for your consultation of this department on this matter. If you have any questions, please do not hesitate to contact me or Jaclyn Lee, Junior Planner at (661) 267-5200.

Sincerely,

Laurie Lile  
Director of Planning

38300 Sierra Highway

Palmdale, CA 93550-4798

Tel: 661/267-5100

Fax: 661/267-5122

TDD: 661/267-5167

7-1

Auxiliary aids provided for

communication accessibility

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upon 72 hours' notice and request.

DOC #

300680

YOSHIDA

# QUARTZ HILL WATER DISTRICT



P.O. BOX 3218, QUARTZ HILL, CA 93586-0218  
42141 N 50<sup>TH</sup> ST WEST, QUARTZ HILL, CA 93536-3512  
TELEPHONE 661-943-3170

November 14, 2003

Los Angeles County Sanitation Districts

Attention: Sagar Raksit

P.O. Box 4998

Whittier, CA 90607-4998

Ph. (562) 699-7411

FAX (562) 695-1874

**Subject: Quartz Hill Water District Comments on the Draft EIR for the Facilities Plan, Lancaster Water Reclamation Plant, 2020.**

This letter sets forth the comments and concerns of the Quartz Hill Water District Board of Directors regarding the Draft Environmental Impact Report, dated September 2003, for the subject Facilities Plan. The following aspect of the Draft EIR concerns us.

The EIR should consider the overall needs of water supply in the Antelope Valley. The Valley relies on 3 major sources of water; the State Water Project, groundwater, and reclaimed water. Of these three; only the reclaimed water supply is not being used to significant advantage.

The Valley is in great need of an effective, basin wide, groundwater management plan, and reclaimed water has the potential to be a crucial part of such a plan. We believe that the Sanitation Districts, the City of Lancaster, Los Angeles County Public Works (WWD), QHWD, AVEK, and California Water should meet and discuss the future of water supply in the Antelope Valley.

The County is encouraging population growth in the Valley in spite of their awareness that the Valley's water supply is already used to its limit. Therefore, we believe that this is a golden opportunity for the County to address the Valley's future water supply needs. From an environmental standpoint, the plan should have the primary objective, of maximizing the use of reclaimed water for landscape irrigation within the area that produces the wastewater flows. This would reduce the use of potable water supplies for irrigation, indirectly provide recharge of the groundwater basin, and also provide for improved use of the imported water supply.

Quartz Hill Water District is considering requiring the installation of dual water systems in all new development, to provide the means to utilize reclaimed water for landscape irrigation and fire fighting and to conserve the potable water supply. We feel that if adequate supplies of tertiary treated water were available, that other agencies would be able to do the same.

8-1

November 14, 2003

**Subject: Quartz Hill Water District Comments on the Draft EIR for the Facilities Plan, Lancaster Water Reclamation Plant, 2020.**

We request the addition of a 5<sup>th</sup> Alternative that would provide for the full utilization of all of the potentially available reclaimed water resource. This would have to include the expansion of tertiary water treatment facilities (AVTTP, see fig. ES-3, attached) that would permit all of the possible uses of such reclaimed water. In addition, new transmission and distribution mains would be needed to deliver reclaimed water into areas of future growth as well as to existing developed areas.

The District feels that this suggested alternative would deal with reclaimed water as a resource rather than as a problem, and that it would also eliminate concerns of flooding and undesirable discharges.

**QUARTZ HILL WATER DISTRICT DIRECTORS**

Dave Meraz  
General Manager

Encl: Figure ES-3

cc: City of Lancaster  
City of Palmdale  
L A County DPW  
AVEK  
CWSC  
PWD  
RCSD  
AVSWCA  
Sen. Pete Knight  
Sup. Mike Antonovich  
Lahontan RWQCB

LWRP 2020 FP 2



# Lancaster Water Reclamation Plant Treatment Schematic

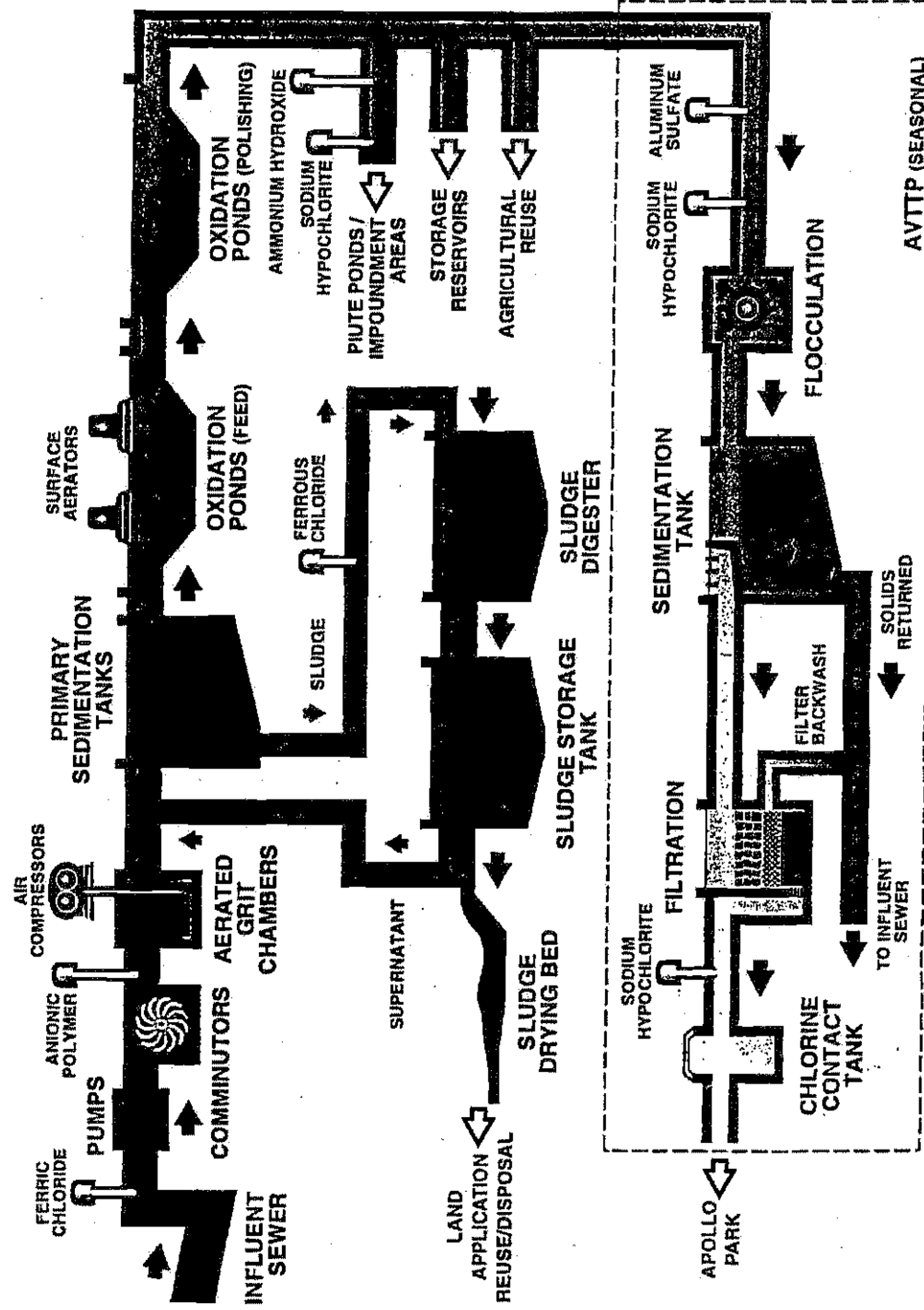


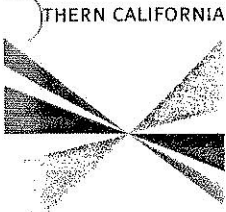
Figure ES-3

LETTER 9

NOV 17 '03 PM 3:28

DOC # 301862

Raksit S



ASSOCIATION OF GOVERNMENTS

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Riverside County: Marion Ashley, Riverside County • Ron Loveridge, Riverside • Jeff Miller, Corona • Greg Pettis, Cathedral City • Ron Roberts, Temecula • Charles White, Moreno Valley

San Bernardino County: Paul Biane, San Bernardino County • Bill Alexander, Rancho Cucamonga • Edward Burgnon, Town of Apple Valley • Lawrence Dale, Barstow • Lee Ann Garcia, Grizzards • Susan Longville, San Bernardino • Ontario • Deborah Robertson, Rialto

Ventura County: Judy Mikels, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneme

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Bill Davis, Simi Valley

November 13, 2003

Mr. Sagar K. Raksit  
Supervising Engineer  
Financial Planning Section, Financial Management Department  
County Sanitation Districts of Los Angeles County  
P.O. Box 4998  
Whittier, CA 90607-4998

RE: Comments on the Draft Environmental Impact Report for the Lancaster Water Reclamation Plant 2020 Facilities Plan – SCAG No. I 20030561

Dear Mr. Raksit:

Thank you for submitting the Draft Environmental Impact Report for the Lancaster Water Reclamation Plant 2020 Facilities Plan to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the Draft Environmental Impact Report for the Lancaster Water Reclamation Plant 2020 Facilities Plan and have determined that the proposed Project is regionally significant per SCAG mandates for regionally significant projects that directly relate to policies and strategies contained in the Regional Comprehensive Plan and Guide (RCPG) and Regional Transportation Plan (RTP). The proposed Project considers a water treatment facility with the capacity of 225,000 gallons per day. CEQA requires that EIRs discuss any inconsistencies between the proposed project and applicable general plans and regional plans (Section 15125 [d]). The Draft EIR does not address SCAG policies that may be applicable to the Lancaster Water Reclamation Plant 2020 Facilities Plan.

Policies of SCAG's Regional Comprehensive Plan and Guide and Regional Transportation Plan, which may be applicable to your project, are outlined in the attachment. We expect the Final EIR to specifically cite the appropriate SCAG policies and address the manner in which the Project is consistent with applicable core policies or supportive of applicable ancillary policies. Please use our policy numbers to refer to them in your Final EIR. Also, we would encourage you to use a side-by-side comparison of SCAG policies with a discussion of the consistency or support of the policy with the Proposed Project.

Please provide a minimum of 45 days for SCAG to review the Draft EIR when this document is available. If you have any questions regarding the attached comments, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP  
Senior Planner  
Intergovernmental Review

9-1

9-2

**COMMENTS ON THE  
DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR THE  
LANCASTER WATER RECLAMATION PLANT  
2020 FACILITIES PLAN  
SCAG NO. I 20030561**

**PROJECT DESCRIPTION**

The proposed Project considers the preparation of a facilities plan for County Sanitation District No. 14 of Los Angeles County's (District) Lancaster Water Reclamation Plant. The plan will assess the wastewater treatment and effluent management needs through the year 2020, and recommend specific improvements to meet those needs.

**INTRODUCTION TO SCAG REVIEW PROCESS**

The document that provides the primary reference for SCAG's project review activity is the Regional Comprehensive Plan and Guide (RCPG). The RCPG chapters fall into three categories: core, ancillary, and bridge. The Growth Management (adopted June 1994), Regional Transportation Plan (adopted April 2001), Air Quality (adopted October 1995), Hazardous Waste Management (adopted November 1994), and Water Quality (adopted January 1995) chapters constitute the core chapters. These core chapters respond directly to federal and state planning requirements. The core chapters constitute the base on which local governments ensure consistency of their plans with applicable regional plans under CEQA. The Air Quality and Growth Management chapters contain both core and ancillary policies, which are differentiated in the comment portion of this letter. The Regional Transportation Plan (RTP) constitutes the region's Transportation Plan. The RTP policies are incorporated into the RCPG.

Ancillary chapters are those on the Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Energy, and Integrated Solid Waste Management. These chapters address important issues facing the region and may reflect other regional plans. Ancillary chapters, however, do not contain actions or policies required of local government. Hence, they are entirely advisory and establish no new mandates or policies for the region.

Bridge chapters include the Strategy and Implementation chapters, functioning as links between the Core and Ancillary chapters of the RCPG.

Each of the applicable policies related to the proposed project are identified by number and reproduced below in italics followed by SCAG staff comments regarding the

consistency of the Project with those policies.

### SUMMARY OF SCAG STAFF COMMENTS

1. The Draft EIR does not address the relationship of the proposed project to **applicable regional plans** as required by Section 15125 [d] of *Guidelines for Implementation of the California Environmental Quality Act*.
2. The Final EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide, utilizing commentary from the following detailed SCAG staff comments. The response should also discuss any inconsistencies between the proposed project and applicable regional plans. We suggest that you identify the specific policies, by policy number, with a discussion of consistency or support with each policy.

### CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The **Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide (RCPG) contains the following policies that are particularly applicable and should be addressed in the Draft EIR for the Lancaster Water Reclamation Plant 2020 Facilities Plan.

- 3.01 *The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.*

#### Regional Growth Forecasts

The Draft EIR should reflect the most current SCAG forecasts which are the 2001 RTP (April 2001) Population, Household and Employment forecasts for the North Los Angeles County Council of Governments (NLACCOG) subregion, the City of Lancaster and the City of Palmdale. These forecasts follow:

<b>NLACCOG</b>						
<b>Subregion</b>	<b>2000</b>	<b>2005</b>	<b>2010</b>	<b>2015</b>	<b>2020</b>	<b>2025</b>
Population	576,478	658,450	786,419	912,257	1,083,020	1,259,354
Household	174,293	211,038	264,936	319,701	378,169	442,773
Employment	187,780	218,429	250,111	268,842	285,963	304,163

City of						
Lancaster	2000	2005	2010	2015	2020	2025
Population	141,354	158,864	197,813	238,080	292,723	349,148
Household	41,929	46,112	62,136	78,465	95,875	115,102
Employment	51,266	60,094	69,220	74,617	79,549	84,791

City of						
Palmdale	2000	2005	2010	2015	2020	2025
Population	132,669	150,948	173,857	196,384	226,955	258,521
Household	38,534	45,674	55,158	64,654	74,867	86,175
Employment	55,995	63,305	70,862	75,329	79,411	83,752

3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

**GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE**

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

3.18 *Encourage planned development in locations least likely to cause environmental impact.*

3.20 *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*

3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*

3.22 *Discourage development, or encourage the use of special design requirements, in*

*areas with steep slopes, high fire, flood, and seismic hazards.*

- 3.23 Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.*

### **GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY**

The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

- 3.27 Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*

### **REGIONAL TRANSPORTATION PLAN**

The **Regional Transportation Plan (RTP)** also has goals, objectives, policies and actions pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the relevant goals, objectives, policies and actions of the RTP are the following:

#### **Core Regional Transportation Plan Policies**

- 4.02 Transportation investments shall mitigate environmental impacts to an acceptable level.*
- 4.04 Transportation Control Measures shall be a priority.*
- 4.16 Maintaining and operating the existing transportation system will be a priority over*

*expanding capacity.*

### **AIR QUALITY CHAPTER CORE ACTIONS**

The **Air Quality Chapter** core actions related to the proposed project includes:

- 5.07 *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.*
- 5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

### **WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS**

The **Water Quality Chapter** core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters.

- 11.07 *Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*

### **CONCLUSIONS**

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

## SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

### *Roles and Authorities*

**THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG)** is a *Joint Powers Agency* established under California Government Code Section 6502 et seq. Under federal and state law, SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). SCAG's mandated roles and responsibilities include the following:

SCAG is designated by the federal government as the Region's *Metropolitan Planning Organization* and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. '134, 49 U.S.C. '5301 et seq., 23 C.F.R. '450, and 49 C.F.R. '613. SCAG is also the designated *Regional Transportation Planning Agency*, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082 respectively.

SCAG is responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the *South Coast Air Quality Management Plan*, pursuant to California Health and Safety Code Section 40460(b)-(c). SCAG is also designated under 42 U.S.C. '7504(a) as a *Co-Lead Agency* for air quality planning for the Central Coast and Southeast Desert Air Basin District.

SCAG is responsible under the Federal Clean Air Act for determining *Conformity* of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. '7506.

Pursuant to California Government Code Section 65089.2, SCAG is responsible for *reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans* required by Section 65080 of the Government Code. SCAG must also evaluate the consistency and compatibility of such programs within the region.

SCAG is the authorized regional agency for *Inter-Governmental Review* of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

SCAG reviews, pursuant to Public Resources Code Sections 21083 and 21087, Environmental Impacts Reports of projects of regional significance for consistency with regional plans [California Environmental Quality Act Guidelines Sections 15206 and 15125(b)].

Pursuant to 33 U.S.C. '1288(a)(2) (Section 208 of the Federal Water Pollution Control Act), SCAG is the authorized *Areawide Waste Treatment Management Planning Agency*.

SCAG is responsible for preparation of the *Regional Housing Needs Assessment*, pursuant to California Government Code Section 65584(a).

SCAG is responsible (with the Association of Bay Area Governments, the Sacramento Area Council of Governments, and the Association of Monterey Bay Area Governments) for preparing the *Southern California Hazardous Waste Management Plan* pursuant to California Health and Safety Code Section 25135.3.

Revised July 2001





# LOS ANGELES AUDUBON SOCIETY

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November 19, 2003

Dr. Sagar Raksit  
County Sanitation Districts of Los Angeles County  
11955 Workman Mill Road  
Whittier, CA 90607-5422

Dear Dr. Raksit,

Thank you for sending a copy of the Draft Environmental Impact Report (EIR) for your facilities expansion project at Lancaster to Los Angeles Audubon Society.

With the unanimous support of our Board of Directors I attended the SCOPE meeting on January 9, 2003, prior to the EIR, to publicly state our enthusiasm, support and interest in a created wetlands and nature center at or near the treatment facility expansion as a viable alternative of water treatment. I cited other models of wetland treatment facilities in the United States that are enjoying tremendous success as nature viewing destinations such as Arcata Marsh in N. California and Wakodahatchee in South Florida.

These wetlands in Lancaster are already critically important habitat for hundreds of thousands of migrating and resident birds and other wildlife that pass through the area, and the area has been identified as an Important Bird Area by Audubon California. Created wetlands are useful to humans, and can serve as a center for educational and recreational activities for children and adults, attracting nature viewers to the area.

There is no mention of this alternative and our support in the draft EIR.

I am writing you to ask you to revise the EIR to reflect created wetlands as an alternative and to reiterate our enthusiasm for such a project.

If a more formal document from our Board of Directors would be more useful please let me know.

Sincerely,

Garry George  
Executive Secretary  
Los Angeles Audubon Society

10-1

DEC 2 '03 AM 8:11

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304686

Raksit S

LETTER 11



Gray Davis  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse



Tal Finney  
Interim Director

November 14, 2003

Sagar Raksit  
Los Angeles County Sanitation District  
1955 Workman Mill Road  
Whittier, CA 90601

Subject: Lancaster Water Reclamation Plant 2020 Facilities Plan  
SCH#: 2001021127

Dear Sagar Raksit:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on November 13, 2003, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts  
Director, State Clearinghouse

11-1

*L. Brown  
Raksit  
11-20-03*

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DOC #  
302438

11.19.03 11/20/03

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2001021127  
**Project Title** Lancaster Water Reclamation Plant 2020 Facilities Plan  
**Lead Agency** Los Angeles County Sanitation District

**Type** EIR Draft EIR  
**Description** Lancaster Water Reclamation Plant 2020 Facilities Plan would expand treatment facilities at the LWRP to accommodate projected wastewater flow and would modify effluent management procedures to include additional storage reservoirs and agricultural reuse.

**Lead Agency Contact**

**Name** Sagar Raksit  
**Agency** Los Angeles County Sanitation District  
**Phone** (562) 699-7411 **Fax**  
**email** www.lacsd.org  
**Address** 1955 Workman Mill Road  
**City** Whittier **State** CA **Zip** 90601

**Project Location**

**County** Los Angeles  
**City** Lancaster, Palmdale  
**Region**  
**Cross Streets** Sierra Highway and Avenue D  
**Parcel No.**  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** 14  
**Airports**  
**Railways** Union Pacific RR  
**Waterways** Amargosa Creek  
**Schools**  
**Land Use** The project site is located in a primarily rural/agricultural portion of the northern unincorporated Los Angeles County and consists of predominantly open space and farms.

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

**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Bd., Region 6 (Victorville); Caltrans, District 7; Department of Food and Agriculture; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

**Date Received** 09/30/2003 **Start of Review** 09/30/2003 **End of Review** 11/13/2003

**LETTER 11A**

**SUNDALE MUTUAL WATER COMPANY**

January 21, 2004

To: Sanitation District 14  
P.O. Box 4998  
Whittier, CA 90607-4998

Subject: Input to EIR for LWRP 2020 Facilities Plan

The draft EIR indicates that Sanitation District 14 will land spread effluent from 2005 to 2007. The EIR does not indicate where the land spreading will be done. In reading between the lines, we the Shareholders of Sundale Mutual Water Company have concluded the Sanitation District will likely land spread on property the District intends to purchase.

Since the District already has effluent line and pumps going to the Nebeker Ranch at 60<sup>th</sup> Street West and Avenue B, we believe this will be a prime area selected by the District to land spread effluent. Sundale Mutual Water Company's well site is less than one mile from this Nebeker Ranch property.

We strenuously object to this practice occurring anywhere near our well sites. As we have stated in previous letters sent to the District, we are concerned not only with the potential contamination of ground water supply, but also the odor produced from the proposed project. Nothing short of tertiary treated water will be acceptable for land spreading or farming not only in our area, but any Antelope Valley Area susceptible to ground water contamination.

11A-1

Sincerely,

President

John M. Ament

*John M. Ament*

Director

John Goit

*John Goit*

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316436

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**SUNDALE MUTUAL WATER COMPANY**  
P.O. BOX 551 • LANCASTER, CA • 93534  
PHONE: (661)256-2620

CC: MAYOR ROBERTS  
MAYOR LEDFORD  
SUPERVISOR ANTONOVICH  
LAHONTON WATER QUALITY BOARD