

## **Appendix B. Comments on the DEIS and Responses**

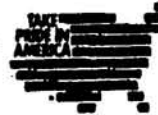
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# United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, D.C. 20240



March 22, 1995

## REQUEST FOR ADDITIONAL COPIES

TO: Jerry Bock, US EPA Region IX  
SUBJECT: DEIS - Joint Water Pollution Control Plant,  
Carson, CA

We have received one copies of your review document for the subject project.

The distribution is not in accord with the Department of the Interior's review procedures for transportation and water resources projects (copy enclosed) and may result in a delay in obtaining the Department's comments.

We will endeavor to meet your commenting due date or provide you with a request for a time extension. Our ability to meet your date, of course, depends on how quickly we receive review copies.

Please send minimum of 9 additional copies to this office for distribution as specified in the enclosure.

*Terence N. Martin*  
Terence N. Martin, Chief  
Transportation and Water Resources  
Division  
Office of Environmental Policy  
and Compliance, Rm. 2340  
1849 C Street, N.W.  
Washington, D.C. 20240

(202) 208-5464



OFFICE OF THE SECRETARY  
Washington, D.C. 20240

## ENVIRONMENTAL REVIEW PROCESS

In order to expedite requests to the Department of the Interior for the review of environmental documents under the National Environmental Policy Act (NEPA); Section 4(f) of the DOT Act (49 U.S.C. 303); project planning, design, and application documents under various Federal authorities; and requests for coordination and consultation early in project planning; please note the following instructions.

Appendix III to the Council on Environmental Quality's (CEQ) regulations (49 FR 49778; December 21, 1984) lists the Director, Office of Environmental Project Review (now the Office of Environmental Policy and Compliance), as the individual responsible for receiving and commenting on other agencies' environmental documents. Consequently, please send all officially approved documents requesting environmental and other project review to the following address for review and comment by the Department of the Interior:

Director, Office of Environmental Policy and Compliance  
Department of the Interior  
Main Interior Building, MS 2340  
1849 C Street, NW  
Washington, D. C. 20240

It is unnecessary to send copies of environmental and other project review requests to any other bureau or office within Interior. However, a sufficient number of copies must be sent to the Office of Environmental Policy and Compliance (OEPIC) to allow distribution of the document to those Interior bureaus being requested to participate in the review. The requested numbers of copies allow for simultaneous review throughout each bureau thus producing the Department's consolidated review in the shortest possible time. A review can be initiated with less than the stated number, but this may lead to a longer review time. The following numbers of copies should be provided:

Twelve (12) copies of a draft and six (6) copies of a final document for projects in the Eastern United States including MN, IA, MO, AR, and LA. The same numbers of copies should be provided for projects in AS, GU, HI, PR, VI, and the Trust Territories.

Eighteen (18) copies of a draft and nine (9) copies of a final document for projects in the Western United States westward of the western boundaries of MN, IA, MO, AR, and LA.

Eighteen (18) copies of a draft and nine (9) copies of a final document for review requests which are national in scope (e.g. agency regulations, scientific reports, special reports, program plans, and other interagency documents).

Sixteen (16) copies of a draft and eight (8) copies of a final document for projects in AK.

When a review document does not have draft and final versions, the larger number of copies is requested.

Appendix II to the CEQ regulations (49 FR 49754; December 21, 1984) lists Interior bureaus and offices with jurisdiction by law or special expertise on environmental quality issues. Appendix II should be used to determine appropriate Interior contacts for coordination during early planning, NEPA scoping, and other preliminary activities.

All early coordination and scoping requests, environmental assessments or reports not accompanied by project planning or design documents, findings of no significant impact, preliminary or working draft or final environmental impact statements, and similar material of a regional nature should be sent directly to Interior bureaus at the field level. It is not necessary to send copies of these documents to the OEPC in Washington, D. C. Please note that our Regional Environmental Officers (REO) serve as representatives of OEPC and should be contacted if there are any questions about these procedures at the field level. An REO list is attached.

Representatives of your organization should establish direct working relationships with Interior's field level offices, which welcome such contact. This type of relationship is important not only during early project coordination, but also to expedite the early resolution of environmental issues that would otherwise surface during the formal review of a project document. In many cases, Interior's comments on an environmental review will designate an office at the field level for follow-up activities.

Since we continue to have problems with documents and requests being misdirected, a wide distribution of this information should be made within your organization. Such a distribution will greatly assist our agencies in better meeting our obligations under existing laws and in planning projects that will be mutually beneficial.

Attachment (REO List)

U.S. DEPARTMENT OF THE INTERIOR  
OFFICE OF ENVIRONMENTAL POLICY AND COMPLIANCE  
REGIONAL ENVIRONMENTAL OFFICERS, ASSISTANTS AND SECRETARIES

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505-766-1865  
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William C. Allan  
Le (LeVonja) M. Watkins

FAX: 303-238-4093  
303-236-6900  
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February 1995

United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
600 Harrison Street, Suite 515  
San Francisco, CA 94107-1376

May 11, 1995

ER 95/233

Ms. Elizabeth Boroiec  
Environmental Assessment Management Branch  
EPA Region IX (W-1)  
75 Hawthorne St.  
San Francisco, CA 94105

Dear Ms. Boroiec:

The Department of the Interior has reviewed the Draft Environmental Impact Statement (DEIS) for the Full Secondary Treatment Upgrade Project at the Joint Water Pollution Control Plant, Los Angeles County, California, and has no comments to offer.

Thank you for the opportunity to comment on this document.

Sincerely,



Patricia Sanderson Port  
Regional Environmental Officer

B-5

cc: Director, OEPC (w/orig. incoming)  
Regional Director, FWS, Portland

## **Response to Comments from the U.S. Department of Interior**

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- 1-1.** In response to this comment, EPA forwarded additional copies of the DEIS to the U.S. Department of Interior. No change to the DEIS is required.



818 West Seventh Street, 12th Floor • Los Angeles, California 90017-3435 || (213) 236-1800 • FAX (213) 236-1825

March 7, 1995

Ms. Elizabeth Borowiec  
Water Management Division  
EPA, Region IX (W-2)  
75 Hawthorne Street  
San Francisco, Ca 94105

RE: SCAG Comments on Draft Environmental Impact Statement (DEIS) for the Full Secondary Treatment Upgrade Project at the Joint Water Pollution Control Plant (JWPCP) in Carson, California  
SCAG No. 19500117

Dear Ms. Borowiec:

Thank you for the opportunity to review and comment on the DEIS for the Secondary Treatment Upgrade Project at the Joint Water Pollution Control Plant (JWPCP) in Carson. As the area-wide clearinghouse for regionally significant projects, SCAG assists cities, counties, and other agencies in reviewing projects and plans for consistency with regional plans. The following comments are based in part upon state and federal mandates<sup>1</sup>.

Pursuant to CEQA Guidelines, the County Sanitation Districts of Los Angeles County (Districts) completed the System 2010 Master Facilities Plan and Associated Draft Program EIR (DEIR) that analyzed the impacts associated with full secondary treatment upgrade at the JWPCP. On January 17, 1995 SCAG reviewed and provided comments on this DEIR (please see attached). SCAG's major concern with the construction and upgrade of wastewater facilities relates to their consistency with SCAG's estimated future population growth within service areas. The DEIR states that proposed action will allow the expansion of up to 400 million gallons per day (mgd) of secondary treatment capacity at the JWPCP, which is consistent with the growth projections contained in the RCPG. Consequently, SCAG concluded that the project appeared to be generally consistent with the Growth Management Chapter of the Regional Comprehensive Plan and Guide (RCPG) and that the proposed project would provide cities in the service area with sufficient wastewater treatment facility capacity to accommodate anticipated growth through the year 2010.

<sup>1</sup> See Endnote.

Bella Montalva City of Berkeley-President, Ed Bickman Los Angeles County-First Vice President, Dick Edly City of Palmdale-Second Vice President, Gerald Vanden Orange County- Past President, Richard Alvarez City of Los Angeles, Richard Alshere City of Los Angeles, Robert Burdett City of Menloville, George Bass City of Bell, Ben Bates City of Los Alamitos, George Baty, Jr. City of Burbank, Neil Berenson City of Los Angeles, Walter Berenson City of Cypress, Marvin Brando City of Los Angeles, Susan Brooks City of Rancho Palms Vistas, Art Brown City of Buena Park, Yvonne Brundage-Burke Los Angeles County, Ben Busby, Jr. City of Victorville, Bob Butler Riverside County, Laura Clark City of Los Angeles, John Cox City of Newport Beach, Cynthia Crothers City of Inverton Valley, Bud Croya City of Laguna, Richard Elson City of Lodi Forest, Doug Evanson City of Long Beach, Lillian Evans City of Yorba, Joseph Egan City of Lakewood, John Ferraro City of Los Angeles, Karl Foy City of Culverton, John Flynn Ventura County, Ruth Galanter City of Los Angeles, Sandra Gaska City of Costa Mesa, Jenita Goldberry City of Los Angeles, Candace Haggard City of San Clemente, Gerhard Harwood City of Inglewood, Mike Harwood City of Los Angeles, Mark Hadden City of Los Angeles, Robert Johnson City of Arcadia, Jeff Kallberg City of Long Beach, Able Land City of West Hollywood, John Langville City of Buena, Sam Lovelidge City of Riverside, John Nelson City of Santa Paula, Barbara Noland City of Alhambra, Judy Nichols City of San Valley, David Myers City of Palmdale, Katherine Nock City of Pasadena, Roy Perry City of Brea, Grossman Perry City of Orange Hills, Ben Parks City of Torrance, Irv Pickler City of Anaheim, Michael Pinsky City of Ontario, Douglas Piva City of Pico Rivera, Larry Rabinhart City of Moorpark, Richard Rabinhart City of Los Angeles, Mark Miller-Thames City of Los Angeles, Albert Robles City of South Gate, Sam Shary Imperial County, Maurice Shaw City of Compton, Rudy Sewald City of Los Angeles, Tom Sykes City of Walnut, Laurie Tully-Payne City of Highland, Joel Washe City of Los Angeles, Rita Walters City of Los Angeles, Judy Wright City of Chico, Zev Yaroshinsky City of Los Angeles

The U.S. Environmental Protection Agency (EPA) intends to disburse direct grant funds to the Districts to fund the planning, design, and construction of the wastewater treatment facilities discussed in the DEIR. This federal action necessitated the development of the DEIS.

After review of the data and analysis contained in the DEIS, it appears to be consistent with that contained in the DEIR. Therefore, SCAG has no further comments on the project at this time. Should there be a change in the scope of the project, we would appreciate the opportunity to review and comment at a later date.

If you have any questions regarding the attached comments, please feel free to contact Maria Souza-Rountree at (213) 236-1838.

Sincerely,

ERIC H. ROTH  
Manager, Intergovernmental Review

B-7

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ENDNOTE

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

*Roles and Authorities*

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(g)-(h), 49 U.S.C. §1607(f)-(g) 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.

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 *Consistency* of Projects, Plans and Programs to the Air 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 Impact 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. §1228(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 San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council) for preparing the *Southern California Hazardous Waste Management Plan* pursuant to California Health and Safety Code Section 25135.3.





2-1. Minor updates have been made to the 2010 Plan and the draft EIR for consistency with the Southern California Association of Governments (SCAG) estimated future population growth in the treatment plant drainage areas. These updates include the following changes to the 2010 Plan:

- Population and employment figures by subregions are updated in Section 5.2.2, page 5-7, Table 5.2-2.
- The percentage of all expected JOS growth is updated in Section 5.2.2, page 5-8, third paragraph, line 6.
- 2010 population figures by treatment plant drainage areas are updated in Section 5.2.3, page 5-9, Table 5.2-3.
- 2010 population figures by treatment plant drainage areas are updated in Section 5.2.4, page 5-15, Table 5.2-8.
- The projected population and 2010 flow figures shown in the formula in Section 5.2.4, page 5-13, are updated.
- The footnote in Section 5.2.4, page 5-13, is added.
- 2010 population and employment figures are updated in Appendix A-5.2-1, Table 1.

The draft EIR also has been changed to reflect this updated demographic data. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR".

Consistency of the proposed project with the Growth Management chapter of the Regional Comprehensive Plan is hereby noted. However, the statement that the proposed project would provide sufficient wastewater treatment facility capacity to accommodate anticipated growth in the JWPCP service area through 2010 would not apply to the Upgrade Project because EPA's proposed action is to disburse funds for upgrade only at the JWPCP, not for expansions.



**MWD**  
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Office of the General Manager

April 17, 1995

January 27, 1995

Ms. Elizabeth Borowiec  
Water Management Division  
U.S. Environmental Protection Agency  
Region IX (W-1)  
75 Hawthorne Street  
San Francisco, California 94105

Mr. Charles W. Carry  
Chief Engineer and General Manager  
County Sanitation Districts  
of Los Angeles County  
1955 Workman Mill Road  
Whittier, California 90601-1400

Dear Ms. Borowiec:

Dear Mr. Carry:

**Draft Environmental Impact Statement  
For the Full Secondary Treatment Upgrade  
Project at the Joint Water Pollution Control Plant**

**Draft Joint Outfall System  
2010 Master Facilities Plan and  
Draft Program Environmental Impact Report**

We have received the Draft Environmental Impact Statement (EIS) for the Full Secondary Treatment Upgrade Project at the Joint Water Pollution Control Plant (JWPCP) in the City of Carson. The County Sanitation Districts of Los Angeles County (Districts) are proposing to upgrade the Districts' JWPCP's secondary treatment capacity from 385 million gallons per day (mgd) to 400 mgd to accommodate projected growth through 2010. The comments herein represent the Metropolitan Water District's (Metropolitan) response as a potentially affected public agency.

We have received the Draft Joint Outfall System (JOS) 2010 Master Facilities Plan (Plan) and Draft Program Environmental Impact Report (Program EIR). The County Sanitation Districts of Los Angeles County (Districts) are proposing to upgrade the Districts' Joint Water Pollution Control Plant (JWPCP) to full secondary treatment and expand the JOS wastewater treatment plants to accommodate projected growth through 2010. The comments herein represent the Metropolitan Water District's (Metropolitan) response as a potentially affected public agency.

The environmental analysis for the Draft EIS is covered in the Joint Outfall System 2010 Draft Program Environmental Impact Report (EIR). On January 27, 1995, Metropolitan responded to the Draft Program EIR. Therefore, Metropolitan's comments also apply to the Draft EIS. A copy of our comments is attached for your information and consideration.

Metropolitan requests that you make the following changes and corrections to the Program EIR:

We appreciate the opportunity to provide input to your planning process. If we can be of further assistance, please contact me at (213) 217-6242.

Page 3-10, third paragraph, last sentence should read:  
The Replenishment District purchases reclaimed water from the Districts and purchases imported water supplies from the Central Basin Municipal Water District, which are then mixed and spread by the DPW (Los Angeles Department of Public Works) in the Rio Hondo and San Gabriel River percolation basins.

Very truly yours,

*Laura J. Simonek*  
Laura J. Simonek  
Senior Environmental Specialist

Page 14-1, fourth paragraph, second sentence should read:  
The Metropolitan Water District of Southern California (MWD) provides imported water supplies to supplement the local supplies of the more than 15 million residents in its 5,154 square-mile service area. This service area covers approximately 5% of the total land area of California and has a \$400 billion economy.

Page 14-1, last paragraph, first sentence should read:  
MWD is composed of member cities, municipal water districts and a county water authority.

MME

Attachment

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Page 14-1, last sentence:

In order to be consistent with page 2-58 of the Plan, please delete the City of Los Angeles and add the City of San Marino to the list of cities within the JOS service area.

Page 14-2, second paragraph, fourth sentence:

Please add Raymond Basin to the list of adjudicated groundwater basins within the JOS service area.

Page 14-2, fifth paragraph should be replaced with:

MWD has water delivery contracts for Colorado River water with the U.S. Department of the Interior for 1.212 million acre-feet per year (MAFY) and an additional 180,000 acre-feet per year (AFY) of surplus water. The capacity of MWD's Colorado River Aqueduct is 1,800 cubic feet per second or 1.3 million AFY. However, as a result of the 1964 U.S. Supreme Court decree in Arizona v. California, MWD's dependable supply of Colorado River water was reduced to less than 550,000 AFY. This reduction in dependable supply occurred with the commencement of Colorado River deliveries by the Central Arizona Project (CAP).

MWD has a priority to divert 550,000 AFY of California's 4.4 MAFY basic apportionment under its water delivery contract with the Secretary of the Interior. In addition, MWD has entered into agreements with water agencies serving Colorado River water for agricultural purposes in the California desert to increase its dependable supplies. Water use by holders of present perfected rights (Indian reservations, towns, and other individuals along the Colorado River that predate MWD's rights) is estimated to reduce dependable diversions by about 30,000 AFY. Conveyance losses along the Colorado River Aqueduct of 10,000 AFY further reduce the amount of Colorado River water received in the coastal plain.

Based on an annual determination, the Secretary of the Interior has allowed MWD in recent years to divert Colorado River water apportioned to, but unused, by Arizona and Nevada. Arizona and Nevada are not expected to use their full apportionments until the years 2036 and 2005, respectively.

Page 14-2, last paragraph and page 14-3, first two paragraphs should be replaced with:

MWD first received deliveries of State Water Project (SWP) supplies in 1972. MWD has contracted for the delivery of approximately 2.01 MAFY of SWP water, or about 48% of the total contracted entitlement. Contractor requests for SWP entitlement have been increasing, and in 1994, they reached 3.85 million

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acre-feet (MAF). While this level of request significantly exceeds the dependable yield from existing SWP facilities, the SWP has been able to meet all contractors' requests for entitlement water except during the drought periods in 1977, 1990 through 1992, and 1994. In addition, surplus water has been delivered to contractors in many years. SWP deliveries to MWD reached a high in 1990 of 1.4 MAF. The only years when MWD received less SWP water than it needed were 1991 and 1992, with a SWP delivery in 1991 of 381,000 acre-feet (AF).

The quantity of SWP water available for delivery is controlled both by hydrology and operational considerations. In the past, SWP operations in the Sacramento-San Joaquin Delta (Delta) were governed by standards established under the State Water Resources Control Board's 1978 Water Rights Decision 1485 (D-1485). D-1485 required compliance with water quality standards and flow requirements for the Delta and assigned responsibility to meet these standards exclusively to the SWP and Central Valley Project.

Currently, the SWP is being operated in accordance with the December 1994 consensus agreement on Bay/Delta standards. This agreement has resulted in a reduction in SWP supplies in order to provide added environmental protections for the Delta.

Page 14-3, third paragraph, first sentence should read: Projected Water Supply: Several programs have been proposed to increase future supply reliability in the MWD service area.

Page 14-3, first bullet, last sentence should read: This program is expected to recover 200,000 AFY of contaminated groundwater. Approximately 100,000 AFY of the annual groundwater production will be untapped local yield or new supplies, while the remaining amount will require replenishment by imported water supplies or reclaimed water to prevent groundwater basin overdraft.

Page 14-3, second bullet should be replaced with: Local Projects Program: MWD has determined that providing financial assistance toward the implementation of reclamation projects would be a regional benefit to its entire service area as reclaimed water could augment local water supplies and increase reliability. In 1982, MWD instituted the Local Projects Program (LPP) as a means by which it could participate with local agencies in expanding local water supplies through reclamation. The LPP provides a contribution of \$154 per

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AF to qualifying projects based on the amount of reclaimed water delivered and used by a project in a particular year. The LPP is expected to yield an additional 200,000 AFY of water by the year 2000.

Page 14-3, third bullet should be replaced with:  
Colorado River Programs:

All American and Coachella Canal Lining Projects

Title II of Public Law 100-675 authorized the Secretary of the Interior to line 65 miles of the All American Canal and the Coachella Canal. The projects are to be constructed with 100 percent non-federal funding. Constructing a 23-mile concrete-lined canal parallel to the existing earthen All American Canal could conserve 67,700 AF of Colorado River water annually. Constructing a 33-mile concrete-lined canal in the existing cross section of the Coachella Canal could conserve 25,700 AF of Colorado River water annually. MWD is proposing to provide the funding for implementation of the All American Canal Lining Project in exchange for use of the conserved water. MWD would be reimbursed if another entity with a higher-priority right were to use the conserved water.

Interstate Underground Storage of Unused Colorado River Water

MWD and the Central Arizona Water Conservation District (CAWCD) executed an Agreement for a Demonstration Project on Underground Storage of Colorado River Water (Agreement) in October 1992. Under the Agreement, 100,000 AF of Colorado River water has been released from Lake Mead, conveyed through the Central Arizona Project's Hayden-Rhodes Aqueduct, and stored underground in Central Arizona. MWD and the Southern Nevada Water Authority (SNWA) paid the costs of storing the water, while CAWCD is responsible for costs of recovery of the water. There are two potential uses of the stored water. CAWCD could use the water during shortages declared by the Secretary of the Interior. Alternatively, MWD and SNWA could exchange this water for CAWCD's Colorado River water subsequent to a surplus occurring or a release for flood control purposes from Lake Mead. MWD and CAWCD have executed an Amendatory Agreement to the Agreement that increases the total amount of water which may be stored from 100,000 AF to 300,000 AF and extends the time for storage activities from December 31, 1996 to December 31, 2000. MWD and CAWCD are seeking the approval of the Amendatory Agreement from a number of agencies, including the States of Arizona and Nevada, and the Bureau of Reclamation, by May 1995.

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Colorado River Basin Regional Water Supply Solution

Representatives of water agencies, the Colorado River Basin States, and the Bureau of Reclamation are working to reach consensus on a number of components which would improve water management in the Colorado River Basin. A major element of this effort is to ensure adequate dependable supplies, in particular for urban users of Colorado River water in Arizona, California, and Nevada. The consensus, which could take the form of regulations for administering entitlements, may include provisions for banking conserved and non-Colorado River system water, interstate water leases, guidelines for surplus and shortage declarations, and wheeling non-Colorado River system water.

Page 14-4, first bullet should be replaced with:

State Water Project Programs: Due to many complex issues, the facilities needed to increase the yield of the SWP have not been constructed. MWD's Integrated Resources Planning (IRP) process identifies interim South Delta facilities, acoustic fish barriers, and a Delta water transfer facility as additional SWP facilities to be included in the Preferred Resource Mix. In addition, the California Department of Water Resources (DWR) is working on developing other water management programs which will increase the SWP yield. The following describes these facilities and programs which are needed to increase SWP water supplies:

Acoustic Fish Barriers

Acoustic fish barriers have been installed on a trial basis along the Sacramento River at the Delta Cross Channel and at Georgianna Slough. If proven to be effective, acoustic barriers will reduce SWP impacts to certain fish species and improve SWP operation and flexibility.

Bulletin-160-93, Level 1 Options

In 1994, DWR issued the update to the California Water Plan, Bulletin 160-93. This bulletin listed several SWP programs, referred to as Level 1 options, that have undergone extensive investigation and environmental analysis and are judged to have a higher likelihood of being implemented by 2020. The following potential SWP programs were listed as Level 1 options:

- Interim South Delta Water Management Program: The preferred alternative for the Interim South Delta Program consists of an additional SWP intake structure at Clifton Court Forebay, limited dredging in South Delta channels, and four South Delta channel flow-control structures. These

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facilities are intended to allow the SWP to increase its export pumping capacity, provide increased operational flexibility, reduce fishery impacts and improve water levels and circulation for local agricultural diverters.

• Long-term Delta Solution:

In 1992, Governor Wilson delivered a water policy statement that established a Bay Delta Oversight Council to guide the planning and environmental documentation process for implementation of a long-term Delta solution. In 1994, federal regulatory agencies joined the State of California in this effort by forming a coalition, known as "CalFed." Members of CalFed signed a Framework Agreement that outlined a joint state/federal process to develop a long-term solution. It is anticipated that this process will take three to four years to identify solutions and carry out the California Environmental Quality Act/National Environmental Policy Act process.

• Kern Water Bank:

The Kern Water Bank consists of local and State-owned groundwater storage programs in Kern County. DWR has estimated that, in total, approximately 2 million AF could be stored in these programs. Planning for Kern Water Bank has slowed to accommodate the long-term Delta solution process.

• Los Banos Grandes Reservoir:

This proposed 1.75 million AF surface reservoir, located near and functioning similarly to San Luis Reservoir, would provide additional SWP storage and yield south of the Delta. The schedule for this project has also slowed to accommodate the long-term Delta solution process.

Proposed SWP Water Supply Planning Strategy

In late 1994, DWR began a scoping process to develop a SWP Future Water Supply Program. This process is focusing on identifying new strategies to develop SWP water supplies during the next 30 years through interim, short-term (next 10 years) and long-term measures. The strategies will include both traditional and "non-traditional" options to develop the necessary supplies in a timely manner. DWR has indicated that they intend to gain broad-based support for this program through public and regulatory agency participation programs. DWR plans to have a report outlining details for implementing the SWP Future Water Supply Planning Strategy by Spring 1996.

B-13

Metropolitan also requests that you make the following changes and corrections to the Plan:

Page 2-57, first paragraph, first three sentences should read:

Water has played a central role in accommodating development in the Los Angeles metropolitan area including the JOS service area. Throughout the history of the region, major efforts have been made to supply a growing population and industrial base with adequate amounts of water. Early in the twentieth century, when it became apparent that local water supplies were not sufficient to support continued development of the Los Angeles region, the City of Los Angeles began to import water from the Owens Valley in Northern California. Later, MWD diverted water from the Colorado River. More recently, the State of California began delivering water from the Sacramento-San Joaquin Delta in Northern California.

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Page 2-57, second paragraph, last two sentences should read:

Imported water from the Colorado River was intended to supplement local water supplies in the original 13 MWD member cities. The 242-mile Colorado River Aqueduct was completed in 1941, and deliveries of Colorado River water to Southern California began that year.

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Page 2-57, third paragraph, last sentence should read:

In 1972, the MWD began distributing water supplies provided by the SWP to meet supplemental demands for water in its service area.

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Page 2-57, last paragraph, first sentence should be replaced with:

MWD provides imported water to supplement local water supplies to more than 15 million residents on the coastal plain of Southern California. Southern California has a highly diversified economy with a value of goods and services produced of approximately 400 billion dollars per year. This economy is dependent on MWD's ability to supply over 55 percent of the water used in Southern California. MWD's 5,154 square-mile service area extends from Ventura to the international boundary with Mexico and includes portions of the six counties of Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura. MWD's mission is to provide its service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way.

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Page 2-58, first paragraph, third sentence should read:

The MWD supplies approximately two-thirds of the water used within its service area, but the JOS municipalities rely even more heavily on MWD.

Page 2-58, first paragraph, last two sentences should be replaced with:

Since the JOS service area is almost entirely within MWD's service area and MWD incorporates both local and imported water into its water resources planning, an analysis of MWD water resources would be representative of water resources available to the JOS service area.

2-64, second paragraph should read:

#### Colorado River Aqueduct

The Colorado River originates in the Rocky Mountains and flows through five states and the Republic of Mexico to the Gulf of California. Rights to use Colorado River water are divided amongst the states in the upper and lower Colorado River Basin and the Republic of Mexico. Colorado River water is used for agricultural, municipal, and industrial purposes. California first began using water from the Colorado River in 1855 and deliveries of Colorado River water to the Southern California coastal plain began in the early 1940's following the completion of the Colorado River Aqueduct. MWD has delivery contracts with the U.S. Department of the Interior for 1.212 MAFY of Colorado River water, and for an additional 180,000 AFY of surplus water. The capacity of MWD's Colorado River Aqueduct is 1,800 cubic feet per second or 1.3 MAFY. In 1964, however, a U.S. Supreme Court decree handed down in Arizona v. California which would significantly reduce California's dependable supply of Colorado River water. MWD's dependable supply was subsequently reduced to less than 550,000 AFY with the commencement of Colorado River water deliveries by the CAP. The volume of MWD's dependable supplies of Colorado River water are affected by use of water by holders of present perfected rights to Colorado River water such as Indian reservations and towns located along the Colorado River, estimated to be 30,000 AFY, and by conveyance losses along the Colorado River Aqueduct, which are estimated to be 10,000 AFY. In April 1994, the U.S. Fish and Wildlife Service (Service) designated approximately two thousand overlapping miles of critical habitat along the Colorado River and certain of its tributaries, in an effort to permit four endangered fish species native to the rivers to survive and recover. While the Service has stated that it did not foresee changes in current hydrologic operations of the Lower Colorado River, it remains to be

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determined whether efforts to recover these species could impact MWD's Colorado River supplies. In 1994, MWD diverted approximately 1.3 MAF of Colorado River water. Since the CAP began operations in 1985, MWD has been able to continue diverting Colorado River water as needed to meet a portion of its service area's demands and storage objectives. This has been accomplished through the use of surplus and unused water and the execution of agreements to:

- Deliver Colorado River water in advance to Coachella Valley Water District and Desert Water Agency
- Implement a water conservation program with Imperial Irrigation District
- Implement a test land-fallowing program with Palo Verde Irrigation District
- Implement a demonstration program to store unused Colorado River water in central Arizona with the CAWCD.

However, deliveries of Colorado River water by the United States Bureau of Reclamation to MWD could be reduced in the future.

Page 2-64, last paragraph, last sentence should read:

MWD may be able to import additional water from the Colorado River during any given year but such diversions are subject to hydrological conditions in the Colorado River Basin and demands for Colorado River water by other users. MWD is negotiating arrangements with other water agencies and the U.S. Department of the Interior to increase its dependable supplies of Colorado River water.

Page 2-65, first and second paragraphs should be replaced with the same language used in Metropolitan's corrections to page 14-2, last paragraph and page 14-3, first two paragraphs of the Program EIR.

Page 2-65, last sentence should read the same as Metropolitan's corrections to page 14-3, first bullet, last sentence of the Program EIR.

Page 2-66, first paragraph should read the same as Metropolitan's corrections to page 14-3, second bullet of the Program EIR.

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Page 2-66, second paragraph. Please replace the last sentence with the following:

Surplus and Unused Water

Studies by the Bureau of Reclamation indicate that, over a period of time, surplus Colorado River water could be made available to MWD in the future in certain years. MWD has diverted available surplus water, water apportioned to but unused by Arizona and Nevada, and unused Colorado River water apportioned to California for use by other agencies for agricultural purposes. Currently, the availability of surplus water and water apportioned to but unused by Arizona and Nevada is determined on a year-to-year basis by the Secretary of the Interior based on a recommendation by the Commissioner of Reclamation. The amount of unused agricultural priority water available to MWD varies from year to year and is dependent upon agricultural economics, type of crops grown and acreage irrigated. Therefore, surplus and unused water are considered to be intermittent supplies due to the uncertainties associated with the determination of their availability to MWD.

Page 2-66, third and fourth paragraphs should be replaced with the same language used in Metropolitan's inserts to page 14-3, third bullet, entitled "All American Canal and Coachella Canal Lining Projects" and "Interstate Underground Storage of Unused Colorado River Water" in the Program EIR.

Page 2-67, paragraph two should be replaced with:

Land-Fallow Programs

Under these programs, MWD would pay lessees/landowners in the Palo Verde and/or Imperial Valleys who irrigate crops with Colorado River water to leave land fallow in exchange for use of the water saved.

Page 2-67, paragraph three should be replaced with the same language used in Metropolitan's insert to page 14-3, third bullet, entitled "Colorado River Basin Regional Water Supply Solution" of the Program EIR.

Page 2-67, fourth paragraph should be replaced with the same language used in Metropolitan's corrections to page 14-4, first bullet of the Program EIR.

Page 2-68, Table 2.5-3 should be corrected as follows:

Table 2.5-3  
Existing and Potential Water Supply for the  
MWD Service Area for the Year 2010 (MAFY)<sup>1</sup>

	Average Year Supply	Dry Year Supply
<b>Existing Supplies</b>		
Local Production	1.05	1.05
Reclaimed Water	0.40	0.40
Los Angeles Aqueducts	0.37	0.12
Colorado River	0.62	0.62
State Water Project <sup>1</sup>	1.54	1.14
<b>Total</b>	<b>3.98</b>	<b>3.33</b>
<b>Potential Supplies</b>		
Additional Colorado River	0.45	0.45
Additional State Water Project <sup>1</sup>	0.40	0.40
Reclaimed Water	0.27	0.27
Groundwater Recovery	0.11	0.20
<b>Total</b>	<b>1.23</b>	<b>1.32</b>
<b>Total Supplies</b>	<b>5.21</b>	<b>4.65</b>

<sup>1</sup>Metropolitan is currently engaged in the IRP process and all supplies and programs are being re-evaluated.

<sup>2</sup>These supply estimates were developed based on D-1485 operating constraints. SWP supplies will be reduced as a result of the December 1994 consensus agreement on Bay/Delta standards.

Page 2-69, second paragraph:

We request that the term "dry year conditions" be further qualified as "critically dry year conditions." The same change applies to Figure 2.5-7.

Page 2-69, last paragraph, first sentence should read:

In summary, given implementation of demand management programs identified in the BMP's (Best Management Practices) and supply augmentation programs and projects identified above, water resources will be sufficient to accommodate anticipated growth during the planning period.

Additionally, Metropolitan requests that you add a section to Chapter 2. The section should read as follows:

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January 27, 1995

2.5-8 MWD Water Resource Planning

MWD and its member agencies are currently engaged in an Integrated Resources Planning (IRP) process. The primary objective of the IRP process is to develop efficient and reliable water supply plans utilizing mixes of local and imported resources as well as demand management options. Water demand projections used in the IRP analyses are consistent with SCAG's (Southern California Association of Governments) 1994 Regional Comprehensive Plan. One of the most important strengths of the IRP process is that it is an open, participatory decision-making process. Participants in the IRP process include Metropolitan, its member agencies, other water supply agencies, water resources agencies, local government, and representatives from the business, agricultural, and environmental communities. All water resources programs are being evaluated in the IRP process. One of the key products of the IRP process is a regional resource management plan that will include specific goals and implementation strategies for each water supply resource and demand management option. The resource management plan is scheduled for completion in mid-1995.

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We appreciate the opportunity to provide input to your planning process. If we can be of further assistance, please contact me at (213) 217-7261.

Very truly yours,  
/s/ Debra C. Man  
for Brian G. Thomas

Brian G. Thomas  
Assistant Chief  
Planning and Resources Division  
Mailed and distributed 1/27/95/bc

MME

cc: Mr. Richard W. Atwater  
General Manager  
Central Basin Municipal Water District  
17140 S. Avalon Boulevard  
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Carson, California 90746-1218

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## **Response to Comments from the Metropolitan Water District of Southern California**

The Metropolitan Water District of Southern California (MWD) comments on the draft EIR were responded to by the Districts in the final EIR. The following responses pertain to the draft EIR and the draft 2010 Plan. These responses are incorporated into the FEIS.

### **Response to Comments on the Draft EIR**

- 3-1.** The draft EIR is hereby changed to state that the Replenishment District purchases reclaimed water from the Districts and purchases imported water supplies from the Central Basin Municipal Water District, which are then mixed and spread by the Los Angeles County Department of Public Works (DPW) in the Rio Hondo and San Gabriel River Coastal Basin Spreading Grounds. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR."
- 3-2.** The draft EIR is hereby changed to state that Metropolitan Water District of Southern California (MWD) provides imported water to supplement local water supplies to more than 15 million residents and the \$400 billion economy in its 5,154-square-mile service area, which is approximately 5% of the total land area of California. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR."
- 3-3.** The draft EIR is hereby changed to state that MWD is a consortium of member cities, municipal water districts, and a county water authority. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR."
- 3-4.** The draft EIR is hereby changed to reflect this correction. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR."
- 3-5.** The draft EIR is hereby changed to reflect this correction. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR."
- 3-6.** The draft EIR is hereby changed to reflect details regarding the amount of Colorado River water currently extracted by MWD. See Chapter 3 of the final EIR, "Changes and Errata in the Draft EIR."
- 3-7.** The draft EIR is hereby changed to reflect details regarding the amount of State Water Project water currently received by MWD. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR."
- 3-8.** The draft EIR is hereby changed to reflect that several programs have been proposed to increase future water supply reliability in the MWD service area. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR."

- 3-9. The draft EIR is hereby changed to reflect that the Groundwater Recovery Program is expected to recover 200,000 AFY of contaminated groundwater. Approximately 100,000 AFY of the annual groundwater production will be untapped local yield or new supplies, while the remaining amount will require replenishment by imported water supplies or reclaimed water to prevent groundwater basin overdraft. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR."
- 3-10. The draft EIR is hereby changed to include a description of the MWD Local Projects Program. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR."
- 3-11. The draft EIR is hereby changed to reflect this correction. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR."
- 3-12. The draft EIR is hereby changed to reflect this correction. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR."

### **Response to Comments on the Draft 2010 Plan**

- 3-13. Changes made to Section 2.5, page 2-57, first paragraph, lines 1-8.
- 3-14. Changes made to Section 2.5.1, page 2-57, second paragraph, lines 5-8.
- 3-15. Changes made to Section 2.5.1, page 2-57, third paragraph, lines 4 and 5.
- 3-16. Changes made to Section 2.5.1, page 2-57, fifth paragraph, continued on page 2-58, lines 1-9.
- 3-17. Changes made to Section 2.5.2, page 2-58, first complete paragraph, lines 4 and 5.
- 3-18. Changes made to Section 2.5.2, page 2-58, first complete paragraph, lines 15-18.
- 3-19. Changes made to Section 2.5.4, pages 2-65 and 2-66, Imported Water Supplies subsection, under Colorado River Aqueduct subheading.
- 3-20. Changes made to Section 2.5.4, page 2-66, Imported Water Supplies subsection, lines 2 through 7 of last paragraph under Colorado River Aqueduct subheading.
- 3-21. Changes made to Section 2.5.4, page 2-66, Imported Water Supplies subsection, under State Water Project subheading.
- 3-22. Changes made to Section 2.5.5, page 2-67, Groundwater Recovery Program subsection.
- 3-23. Changes made to Section 2.5.5, page 2-67, Wastewater Reclamation subsection.

- 3-24. Changes made to Section 2.5.5, pages 2-67 and 2-68, Colorado River Programs subsection, under Surplus and Unused Water subheading.
- 3-25. Changes made to Section 2.5.5, page 2-68, Colorado River Programs subsection, under All American Canal and Coachella Canal Lining subheading and Interstate Underground Storage of Unused Colorado River Water subheading.
- 3-26. Changes made to Section 2.5.5, page 2-69, Colorado River Programs subsection, under Land Fallowing Programs subheading.
- 3-27. Changes made to Section 2.5.5, page 2-69, Colorado River Programs subsection, under Colorado River Basin Regional Water Supply Solution subheading.
- 3-28. Changes made to Section 2.5.5, pages 2-69 through 2-71, State Water Project Programs subsection.
- 3-29. Changes made to Section 2.5.6, Table 2.5-3, and to Section 2.5.7, page 2-72, first and second paragraphs and Figures 2.5-6 and 2.5-7.
- 3-30. Changes made to Section 2.5.7, page 2-72, paragraph 2, line 1, and to Figure 2.5-7.
- 3-31. Changes made to Section 2.5.7, page 2-73, first paragraph.
- 3-32. Section 2.5.8 has been added to the final 2010 Plan.

