APPENDIX A-8.2

Comment Letters and Responses

Letter 1

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Carlsbad Field Office
2730 Loker Avenue West
Carlsbad, California 92008

January 27, 1995

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

Attn: Gary Yoshida

Re: Draft Program Environmental Impact Report Joint Outfall System 2010 Master Facilities Plan

Dear Mr. Carry:

The Fish and Wildlife Service (Service) has review the draft environmental impact report (EIR) for the Joint Outfall System 2010 Master Facilities (2010 Plan). This 2010 Plan addresses long-term wastewater treatment, reuse, and disposal needs through 2010 for the County Sanitation Districts of Los Angeles County (Sanitation Districts). The Service has concerns regarding threatened and endangered species, mitigation to offset project impacts, biosolids and growth-inducing impacts associated with the development of the 2010 Plan.

In a January 3, 1995, conference call with Christine Bailey, Environmental Services Unit, State Water Resources Control Board, Service biologists Marjorie Nelson and Martin Kenney of my staff requested a 10 day extension to review the draft EIR and provide comments on the 2010 Plan. Ms. Bailey approved this request for additional time needed to review the document.

A major concern of the Service is to ensure potential impacts to threatened and endangered species from project construction and operation are avoided. A list of federally listed species that may occur within the project area was provided by the Service in a letter dated November 16, 1994, to Christine Bailey. In addition, Paul Cylinder of Jones and Stokes Associated, Inc., a consultant to the Sanitation Districts, provided Marjorie Nelson a list, dated January 17, 1995, of federal and state special-status wildlife species including threatened and endangered species that could potentially occur at the Joint Water Pollution Control Plant at Carson, California. The draft EIR document identified additional federally listed species that was not included in the Service's November 16, 1994 list. These lists need to be carefully reviewed for species that could occur in the project area. Where recent surveys for a species of concern are not available, the Service recommends a qualified biologist be hired to conduct appropriate surveys to determine the presence or absence of the species in question. 1-1

One state and federal listed endangered species that was identified in the EIR document that may be affected by the project was the least Bell's vireo (*Vireo bellii pusillus*). The least Bell's vireo (vireo) may be affected by the proposed expansion of the Whitter Narrows Water Reclamation Plant (WRP). This impact would occur with the destruction of 1 to 1.5 acres of riparian scrub habitat associated with the construction of the proposed primary sediment tanks, wet well, pump station and fill placed for a roadway. Chapter 11 "Botanical and Wildlife Resources", page 16 identifies the riparian habitat at the Whitter Narrows WRP as "potential breeding habitat for the least Bell's vireo". In addition to the loss of suitable breeding habitat for the vireo, a proposed roadway fill would impact an undisclosed acreage of ruderal vegetation that has mulefat and arroyo willow vegetation that may provide suitable foraging habitat for this species. Vireo surveys should be regularly conducted between April 1 to July 31 by a qualified biologist familiar with the vocalizations of this species. 1-2

The proposed replacement of this riparian loss at a 2:1 ratio (i.e., 2 acres of riparian habitat would be restored for each acre removed) would be unacceptable given the riparian vegetation being destroyed is of sufficient quality to be classified as potential breeding habitat for the vireo. At a minimum this habitat loss should be replaced at a 3:1 ratio and if surveys determine that this habitat is occupied by a nesting vireo then the loss of riparian habitat should be compensated at a 5:1 ratio. The replacement of riparian habitat impacted should be identified in a specific mitigation plan approved by the Service prior to applying for a Corps of Engineers permit that would alter or destroy this wetland habitat. This mitigation plan should include, at a minimum: (a) the location of the mitigation site, (b) the number, size, and species of plants that would be used in the revegetation effort, (c) a schematic layout depicting the arrangement of the plants within the compensation area, (d) time of year that the planting would occur, (e) identification of the elevation of the groundwater level at the compensation area and if irrigation is proposed to be used, (f) an analysis of soil conditions at the mitigation site, (g) measures to be taken to control exotic vegetation at the site, (h) a detailed monitoring program that includes provisions for replanting areas where planted materials have not survived, and (i) identification of the agency responsible for guaranteeing the successful creation of the mitigation site and perpetual conservation of the restoration area. Mitigation plans should be prepared for project impacts not only to riparian forest and scrub habitats, but also freshwater marsh. 1-3

Other potential riparian habitat could be affected by the project is the excavation of soil and vegetation in the Whitter Narrows Flood Control Basin equal to the volume of floodplain lost with the proposed fill associated with proposed expansion of the Whitter Narrows WRP. Any riparian habitat impacted by the above identified excavation needs to be quantified. If the vegetation that would be impacted is suitable to be occupied by the vireo or the southwestern willow flycatcher (willow flycatcher), a state endangered species and a federally proposed endangered species the area impacted should be surveyed by a qualified biologist that is familiar with the identification and vocalization of these species. 1-4

With this proposed project there needs to be an examination of other practicable less damaging alternatives that can be employed to avoid the fill of wetland habitat. 1-4

Additional impacts to the vireo and other migratory songbirds could result from construction noise and the placement and operation of lights at the Joint Water Pollution Control Plant or at the Whitter Narrows and San Jose Creek Water Reclamation Plant sites. Noise levels from construction or plant operations must be at 60 decibels or below to avoid affects to migratory songbirds, such as, the vireo during the breeding season. Lights should be shielded or be low profile to ensure that they do not laminate riparian or freshwater marsh habitats. 1-5

In conjunction with plant operations next to freshwater marsh habitat, Chapter 11 "Botanical and Wildlife Resources", page 19 states that "In cooperation with the Los Angeles County Department of Public Works, the Districts propose to prepare a marshland management plant to improve irrigation to the marsh and to maintain the marsh. The plan would be implemented by 2004." The Service would like to receive a copy of the draft plan to review and provide comments on. In addition, the final EIR needs to identify measures that would be incorporated into the project avoid impacts associated with construction, lights and increased human activities at marsh adjacent to the Joint Water Pollution Control Plant at Carson. 1-6

Another subject of concern to the Service is the "biosolids management plan". Based on projections developed for the 2010 Plan, it is expected that 2,000 to 2,400 wet tons or 575 dry tons per day of biosolids will be produced in the Joint Outfall System. These biosolids must be disposed or reused. Those biosolids disposed must be placed in appropriate landfills. Landfills currently used include the Puente Hills Landfill; Kellogg Supply, Inc. and Pima Gro Systems in Thermal; Recyc, Inc. in Corona; and Ag Tech Company in Yuma, Arizona. Future sites that may be used include several land application sites in Kern and King Counties; Bole Station Landfill in San Bernardino County; Eagle Mountain Landfill in Riverside County and Mesquite Regional Landfill in Imperial County. It was stated in Chapter 11 "Botanical and Wildlife Resources " that in the disposal of biosolids the Sanitation Districts would require contractors to demonstrate that wildlife and wildlife have been avoided or that impacts have been reduced to less-than-significant levels through preparation of site-specific environmental documents or compliance with federal, state and local regulations. Since the proposed project would directly result in the generation large quantity of biosolids on a daily basis the biological impacts associated with the proposed disposal of this waste must be simultaneously addressed as part of the Joint Outfall System 2010 Master Facilities Plan. This is an interrelated activity associated with project and has the potential to impact threatened and endangered species. This potential impact must be addressed as part of this planning effort. It is recommended that the existing capacity and projected life of these landfills be described in the final EIR prepared for the project. In addition, a list of threatened and endangered species that occur in the vicinity of each landfill site should be obtained and potential impacts to listed species from landfill 1-7

operations or expansion needs to be addressed. This analysis would provide a solid basis for selecting the least environmentally damaging alternative. 1-7

A final issue of concern is the subject of growth related impacts. Fifteen Sanitation Districts that are located in metropolitan Los Angeles County participate in the Joint Outfall Agreement which provides for combined investment in wastewater conveyance and treatment facilities. These 15 Districts are collectively known as the Joint Outfall Districts (JOD) and are located in the central Los Angeles Basin in the eastern and southern portions of Los Angeles County. The JOD extend south and west from the foothills of the San Gabriel Mountains to the Palos Verdes Peninsula and are bonded to the east by Orange and San Bernardino Counties, to the west by the Cities of Los Angeles and Glendale and Santa Monica Bay, and to the south by San Pedro Bay.

The JOD have constructed a regional, interconnected system of wastewater conveyance and treatment facilities, known as the Joint Outfall System (JOS). The JOS sewage treatment and disposal services for residential, commercial, and industrial users and presently includes six wastewater treatment plants with a combined capacity of approximately 576 mgd, more than 1,000 miles of main trunk sewers, and 48 pumping plants. The JOS service area encompasses 71 cities and unincorporated territory in the Los Angeles Basin and currently serves approximately 45 million people and treats approximately 480 mgd of wastewater.

The construction and expansion of Joint Water Pollution Control Plant at Carson and associated water reclamation plants would provide critical infrastructure necessary for continue growth in Los Angeles County. This growth will directly impact wildlife resources and habitat and will undoubtedly lead to the eventual listing additional state and federal threatened and endangered species. Addressing project impacts on a case-by-case basis is largely ineffective in dealing with bird and mammal populations that need large contiguous tracts of land if their populations are to persist within a region. We recommend that this project, that encompasses 71 cities, be used as a focus point to initiate long range planning to identify key parcels of land that have high biological value and that can be purchased for the purpose of protecting fish and wildlife resources and open space. This type of planning effort is currently being done in San Diego, Orange, Riverside, and San Bernardino Counties with emphasis on the California gnatcatcher and Stephens' kangaroo rat. It is recommended that a similar planning effort be initiated for Los Angeles County as part of this overall project. 1-8 1-9

If you have any questions regarding this letter, please contact Marjorie Nelson or Martin Kenney. They can be reached at (619) 431-9440.

Sincerely,

Gail C. Kobetich
Field Supervisor

1-6-95-TA-098

1-1. Table 11-1 in the draft EIR, "Special-Status Plant Species Potentially Occurring at JOS Facilities Proposed for Expansion" and Table 11-2 in the draft EIR, "Special-Status Wildlife Species Potentially Occurring at JOS Facilities Proposed for Expansion", have been revised pursuant to conversations with U.S. Fish and Wildlife Service (USFWS) staff since release of the draft EIR. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR", for changes to these tables.

Section 7 of the Endangered Species Act requires a lead agency to consider the effects of the preferred alternative on endangered species (in this case, Alternative 1: Upgrade JWPCP/Expand Los Coyotes WRP/San Jose Creek WRP). For Section 7 compliance requirements, USFWS staff concluded that project boundaries would be focused on the JWPCP project element of the 2010 Plan because only the proposed modifications to the JWPCP are subject to State Revolving Fund ESA compliance (Nelson pers. comm.). The inland WRPs included in Alternative 1 (the Los Coyotes and San Jose Creek WRPs) were not considered further for Section 7 compliance because:

- proposed expansion areas for these WRPs do not support suitable habitat for special-status species,
- no records of special-status plant or wildlife occurrences were found in a search of the Natural Diversity Data Base, and
- no special-status plant or wildlife species were observed during site visits to these WRPs.

Upon further consideration of the JWPCP site, USFWS staff concluded that special-status species surveys need not be conducted and that a biological assessment need not be prepared for the JWPCP project element (U.S. Fish and Wildlife Service 1995). Furthermore, 2010 Plan project elements other than modifications to the JWPCP and certain specific biosolids management options are analyzed on a program level; project-specific effects of these elements on threatened and endangered species will be reexamined during subsequent environmental review.

1-2. Impacts associated with the Whittier Narrows WRP expansion were evaluated in the draft EIR on a program level. The mitigation measures proposed for this expansion are program-level measures and are not meant to replace subsequent project-specific mitigation. Furthermore, the Whittier Narrows WRP expansion is not part of the 2010 Plan recommended alternative and therefore is not part of the project the Districts plan to approve after certification of this EIR. If the Districts decided to expand the Whittier Narrows WRP in the future, all significant environmental

impacts of the Whittier Narrows WRP expansion, including those related to breeding and foraging habitat for the least Bell's vireo, would be examined in detail. Surveys for the least Bell's vireo would be coordinated and conducted by a qualified biologist consistent with USFWS protocol for the species if expansion of this WRP were pursued by the Districts.

1-3. Mitigation Measure 11-3 on page 11-21 of the draft EIR states that at least 2 acres of riparian scrub habitat would be restored for each acre removed from the project (emphasis added). The Whittier Narrows WRP expansion, which is not part of the Districts' recommended alternative, is analyzed in the draft EIR on a program-level. Consequently, the proposed footprint of the proposed expansion could be modified in the future and any future proposals to expand the Whittier Narrows WRP would require subsequent environmental review separate from that analyzed in the draft EIR. Specific mitigation measures for this 2010 Plan element, including specific replacement ratios for the loss of riparian scrub and its value as breeding habitat for the least Bell's vireo, could not be refined until the Districts identified this expansion as a preferred project-specific alternative. If the Districts decide to pursue the Whittier Narrows expansion in the future, mitigation measures would be developed based on the results of surveys and consultation with the USFWS. The Districts have modified Mitigation Measure 11-3 to incorporate additional elements into the riparian habitat restoration plan requested by USFWS. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR", for modifications to Mitigation Measure 11-3.

1-4. The Districts plan to avoid riparian habitat or other habitat suitable for special-status species when they identify replacement sites for lost storage capacity in the Whittier Narrows Flood Control Basin from the import of fill to elevate the proposed Whittier Narrows WRP expansion. If the Districts decide to pursue this project, specific replacement sites would be identified at that time and if any habitat considered suitable for special-status species would be lost, the Districts would take appropriate actions to survey the affected areas and ensure that appropriate mitigation is adopted. No change to the draft EIR is required.

1-5. The JWPCP and the inland WRP areas currently experience traffic noise and several sources of light because of the existing treatment plant operations and adjacent land uses. Page 9-5 of the draft EIR indicates that the noise environment in the JWPCP area is currently dominated by traffic noise mostly associated with the elevated Harbor Freeway (I-110), which is adjacent to the JWPCP marsh. Existing noise levels near the JWPCP range from 62 to 64 dB. Additionally, the City of Carson general plan designates the JWPCP site as industrial and the City of Los Angeles general plan designates the JWPCP site as heavy industrial; both general plans identify expected ambient noise levels for such land use as 70 dB. Furthermore, Mitigation Measure 9-1 requires all construction contractors to implement noise-reducing construction practices.

Page 11-20 of the draft EIR identifies the potential for disturbance of wildlife at the riparian and marsh habitats from increased human activity associated with modifications to the JWPCP. The proposed project's effects on nearby wildlife was determined to be less than significant because the area is already surrounded on all sides by major light and noise sources, including the elevated Harbor Freeway (approximately 200 feet from the marsh), Sepulveda Boulevard, Figueroa Street, the Atchison-Topeka and Santa Fe Railroad (AT-SF), a strip shopping mall, and commercial bedding plant nurseries.

Construction- and operations-related noise impacts at the San Jose Creek and Whittier Narrows WRPs were determined to be less than significant in the draft EIR (see pages 9-16 through 9-19 in the draft EIR). No change to the draft EIR is required.

1-6. The Districts have revised Mitigation Measure 11-2, "Prepare and Implement a Marshland Management Plan", for the JWPCP marsh site to enhance the riparian forest and convert ruderal vegetation. USFWS' request to review the draft plan has been incorporated into the mitigation measure. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR", for modifications to Mitigation Measure 11-2.

As described above in response to Comment 1-5, page 11-20 of the draft EIR addresses the potential for disturbance of wildlife at the riparian and marsh habitats from increased human activity associated with the JWPCP modifications. Specifically, the area adjacent to the marsh is currently surrounded by a freeway to the west, the AT-SF to the south, and a commercial nursery to the north and east (see Figure 11-2 of the draft EIR). Because the current land uses surrounding the marsh site have already acclimated wildlife to human disturbance, it was determined that the proposed modifications would have a less-than-significant effect on the wildlife. Consequently, no mitigation is necessary. No change to the draft EIR is required.

1-7. USFWS identified five sites used by the Districts as "landfills", but most of these are reuse sites. The only landfill currently used by the Districts for biosolids disposal is the Puente Hills Landfill. Table 6-3 of the draft EIR listed the reuse contractors and sites:

- Kellogg Supply, Inc.,
- Recyc Inc.,
- Ag Tech Company, and
- Pima Gro Systems.

Since circulation of the draft EIR, some changes in the reuse sites have occurred. The Thermal composting site that served Kellogg Supply and Pima Gro has closed. Ag Tech has opened an additional land application site near Delano, California, that

now receives some of the Districts' biosolids. The Districts also have initiated new land application contracts with the Yakima Company near Buttonwillow, California; McCarthy Family Farms near Corcoran, California; and one short-term contract with Bio Gro Systems near Blythe, California. The current distribution of biosolids reuse and disposal (disposal is only at the Puente Hills Landfill) is shown in Table 2-1.

Table 2-1. Current Distribution of Biosolids Disposal and Reuse (in wet tons per week)

Contractor/Site	Biosolids Delivered in January 1995	Maximum Contract Amount Allowed
Recyc Inc. (reuse)	0	1,000
Ag Tech Company (reuse)	1,346	2,000
Bio Gro Systems (reuse)	812	2,000
McCarthy Family Farms (reuse)	1,699	2,000
Yakima Company (reuse)	580	1,000
Puente Hills Landfill (disposal)	5,565	not applicable

The sites listed in Table 2-1 are not designated exclusively for Districts operations; many of them receive biosolids from other generators either now or will in the future. The Puente Hills Landfill receives primarily municipal refuse and the projected site life is expected to continue through 2013. The projected site life of any land application site is based on the metals concentrations of the applied biosolids and the application rate. Assuming a typical application rate of 7.5 tons per acre, Districts-generated biosolids could be applied to a site for more than 150 years. The permitted capacity and environmental documentation for the current sites are listed in Table 2-2.

Because both biosolids reuse technology and the availability of reuse sites are rapidly changing, the Districts are limited in their ability to select a range of alternative site locations proposed by private contractors. The three landfills identified in the draft EIR as potential future sites were established to develop travel routes and distances from the JWPCP for the transportation and air quality analyses. These landfill sites are not Districts facilities. They are in the planning stages and would be operated by private contractors. However, the Districts require contractors to demonstrate compliance with applicable local, state, and federal laws (including the Endangered Species Act) for biosolids end-use sites. The contractor must have an approved environmental document for each site before the Districts will consider its use. The lead agencies considering the environmental documentation would be required to address the environmental impacts of the sites and alternatives similar to the review

Table 2-2. Environmental Documentation for Existing Biosolids Disposal and Reuse Sites

Site	Permitted Capacity (wet tons per week)[a]	Environmental Documentation
Recyc Inc.	3,500	EIR (12/7/89); State Clearinghouse number 88100318
Ag Tech Company	7,600	Yuma: ND (1991) State Clearinghouse number 91051081 Kern: Mitigated ND (9/16/94) Resolution number 94-252, Central Valley RWQCB[c]
Bio Gro Systems	9,500	Mitigated ND (3/25/93) Bio Gro Sludge Management Plan for the County of Riverside; State Clearinghouse number 93022027 Mitigated ND (1990) Bio Gro Colorado Basin RWQCB; State Clearinghouse number 89031307 ND (1/28/91) Riverside County Ordinance Regulating Land Application of Sewage Sludge; State Clearinghouse number 91012065
McCarthy Family Farms	10,000	Mitigated ND (8/5/94) Resolution number 94-214, Central Valley RWQCB[c]
Yakima Company	800	Mitigated ND (1/27/95) Resolution number 95-011, Central Valley RWQCB[c]
Puente Hills Landfill	12,000[b]	EIR (3/23/94); State Clearinghouse number 91121070

Note: ND = Negative Declaration.

[a] Assumes 25% total solids and an application rate of 7.5 dry tons/acre on the permitted acreage for land application sites.

[b] 72,000 wet tons per week capacity and a minimum of 5 parts refuse to 1 part biosolids.

[c] Waste discharge requirements for site require a preapplication report that includes a species survey by a qualified biologist.

process established by existing contractors, including the effect of the development on threatened and endangered species. The Districts would not consider use of any sites until the sites were fully permitted. Additionally, page 14-11 of the draft EIR states that disposal of the Districts' biosolids in landfills would contribute to less than 1% of existing landfill space. No change to the draft EIR is required.

1-8. In Chapter 17 of the draft EIR, "Cumulative, Growth-Inducing, and Growth-Related Impacts", the Districts have acknowledged that the 2010 Plan can be seen as removing an obstacle to growth in the JOS service area and that under a strict CEQA definition of growth inducement, the 2010 Plan can be considered growth inducing, even though the plan is not an important factor affecting regional economic and population growth. Several factors affect the magnitude, timing, and type of economic and population growth, and include local government planning, economic climate, quality of life, and availability of public services and natural resources. Chapter 17 of the draft EIR identifies those impacts related specifically to growth inducement. Page 17-13 specifically identifies the loss of special-status wildlife species habitat and at-risk biological communities as growth-related impacts associated with the 2010 Plan. The mitigation measure proposed for this impact calls for the preservation of special-status species habitat and at-risk habitat by implementing local and SCAG RCP policies, which would reduce the impact to less than significant. Furthermore, SCAG concurred with this conclusion in its comment letter on the draft EIR (see Comment 12-4 in Letter 12 of the final EIR). No change to the draft EIR is required.

1-9. The Districts recognize the need for efforts to conserve and enhance large contiguous tracts of land with high biological value. The Districts, however, do not have the authority to take the lead in planning efforts for habitat conservation. Figure 11-1 of the draft EIR identifies areas in the JOS service area and the greater Los Angeles County supporting natural habitats. Plans currently underway to preserve these natural areas include the Palos Verdes Peninsula Natural Communities Conservation Plan, which encompasses 1,500 acres, and the Ocean Trails Habitat Conservation Plan, which encompasses approximately 170 acres. Additional conservation efforts include those of the Palos Verdes Peninsula Land Conservancy and those at the Puente Hills Landfill. The Palos Verdes Peninsula Land Conservancy has created two preserves in Los Angeles County: 20 acres in Lunada Canyon and 28.5 acres in the City of Rolling Hills Estates. The Palos Verdes Peninsula Land Conservancy plans to acquire 900 acres for the proposed Portuguese Bend Nature Preserve in Los Angeles County. Conservation efforts at the Puente Hills Landfill include preservation and enhancement of approximately 230 acres of natural habitat, planting of over 1,700 trees grown from coast live oak acorns gathered onsite, and creation of the Puente Hills Landfill Native Habitat Preservation Authority, which will be funded by as much as $75 million from the landfill operation.

Letter 2

STATE OF CALIFORNIA PETE WILSON, Governor

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO, CA 95814

January 3, 1995

GARY YOSHIDA
COUNTY SANITATION DISTRICTS, LOS ANGELES
1955 WORKMAN MILL ROAD
WHITTIER, CA 90601

Subject: JOINT OUTFALL SYSTEM 2010 MSATER FACILITIES PLAN SCH #: 94021011

Dear GARY YOSHIDA:

The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period is closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. 2-1

Please call Mark Goss at (916) 445-0613 if you have any questions regarding the environmental review process. When contacting the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

Michael Chiriatti, Jr.
Chief, State Clearinghouse

Appendix C

Notice of Completion

SCH # 94021011

Project Title: JOINT OUTFALL SYSTEM 2010 MASTER FACILITIES PLAN
Lead Agency: COUNTY SANITATION DISTRICTS OF LA COUNTY   Contact Person: GARY YOSHIDA
Street Address: 1955 WORKMAN MILL ROAD   Phone: 310 699-7411
City: WHITTIER   Zip: 90601   County: LOS ANGELES

Project Location
County: LOS ANGELES   City/Nearest Community: VARIES (72 CITIES + UNINCORPORATED)
Cross Streets: NA   Zip Code: VARIES   Total Acres: NA
Assessor's Parcel No.: NA

Document Type

Local Action Type

Development Type

Project Issues Discussed in Document

Present Land Use/Zoning/General Plan Use: VARIES

Project Description: THE COUNTY SANITATION DISTRICTS OF L.A. COUNTY HAVE PREPARED A DRAFT FACILITIES PLAN (2010 PLAN) FOR THE JOINT OUTFALL SYSTEM TO ADDRESS LONG-TERM WASTEWATER MANAGEMENT NEEDS THROUGH 2010. THE PLAN INVOLVES UPGRADING THE JOINT WATER POLLUTION CONTROL PLANT IN CARSON TO FULL SECONDARY TREATMENT AND A COMBINATION OF EXPANSIONS OF WATER RECLAMATION PLANTS. THE PLAN ADDRESSES WASTEWATER TREATMENT, REUSE, AND DISPOSAL NEEDS.

CLEARINGHOUSE CONTACT: Mark Goss
(916) 445-0613

STATE REVIEW BEGAN: 11-17-94
DEPT REV TO AGENCY: 12-27
AGENCY REV TO SCH: 12-30
SCH COMPLIANCE: 1-3

PLEASE NOTE SCH NUMBER ON ALL COMMENTS

PLEASE FORWARD LATE COMMENTS DIRECTLY TO THE LEAD AGENCY ONLY

AQMD/APCD: 33 (Resources: 11/17)

CNT SNT
Resources
Boating
3 Coastal Comm
Coastal Consv
Colorado Rvr Bd
3 Conservation
3 Fish & Game 5
3 Forestry
3 Parks & Rec/OHP
Reclamation
BCDC
3 DWR
Bus Transp Hous
Aeronautics
CHP
3 Caltrans # 7
Trans Planning
Housing & Devel
Health & Welfare
Drinking H2O
Medical Waste

CNT SNT
State/Consumer Svcs
General Services
OLA (Schools)
Cal/EPA
3 ARB
3 CA Waste Mgmt Bd
3 SWRCB:--Grants
SWRCB:--Delta
SWRCB:--Wtr Quality
SWRCB:--Wtr Rights
3 Reg. WQCB # 4
DTSC/CTC
Yth/Adlt Corrections
Corrections
Independent Comm
Energy Comm
NAHC
3 PUC
Santa Mn Mtns
State Lands Comm
Tahoe Rgl Plan
Other:

Response to Comments from the Governor's Office of Planning and Research (first letter)

2-1. The Districts considered and responded to all written comments received.

Letter 3

STATE OF CALIFORNIA — PETE WILSON, *Governor*

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO, CA 95814

January 12, 1995

GARY YOSHIDA
COUNTY SANITATION DISTRICTS, LOS ANGELES
1955 WORKMAN MILL ROAD
WHITTIER, CA 90601

Subject: JOINT OUTFALL SYSTEM 2010 MSATER FACILITIES PLAN SCH #: 94021011

Dear GARY YOSHIDA:

The enclosed comments on your draft environmental documents were received by the State Clearinghouse after the end of the state review period. We are forwarding these comments to you because they provide information or raise issues which may assist you in project review. 3-1

Lead agencies are not required to respond to late comments. However, you may wish to incorporate these additional comments into the preparation of your final environmental document.

Please contact Mark Goss at (916) 445-0613 if you have any questions concerning the review process. When you contact the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

Michael Chiriatti, Jr.
Chief, State Clearinghouse

Enclosures
cc: Resources Agency

Response to Comments from the Governor's Office of Planning and Research (second letter)

3-1. The comment letter prepared by the California Department of Transportation was sent directly to the Districts and is not considered late. However, the Districts have responded to all comments received on the 2010 Plan and the draft EIR after the close of the comment period.

Letter 4

State of California — Business, Transportation and Housing Agency

Memorandum

To: Mr. Mark Goss
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

Date: January 6, 1995

File No: IGR/CEQA/DEIR
County of Los Angeles
JOINT OUTFALL SYSTEM
2010 MASTER FACILITIES
PLAN

From: Wilford Melton -District 7
DEPARTMENT OF TRANSPORTATION

Vic. LA-1, 60, 110,
605-Various

Subject: Project Review Comments

SCH No.94021011

Caltrans has reviewed the above-referenced Joint Outfall System 2010 Master Facilities Plan. Based on the information received, and in addition to our previous comments made on February 25, 1994, we are not satisfied with the document's traffic analysis.

We would like to see an Intersection Capacity Utilization (ICU) analysis for the intersection of Pacific Coast Highway (SR-1) and Figueroa Street similar to that done for Sepulveda Boulevard and Figueroa Street. 4-1

Any transport of hazardous waste or heavy construction equipment which requires the use of oversize transport vehicles on State Freeways/Highways will require a Caltrans transportation permit. We recommend that large size trucks that are transporting construction materials, equipment, and exporting contaminated soil be limited to off-peak commute periods. 4-2 4-3

The applicant shall comply with all applicable hazardous waste safety measures when transporting materials from the sites. 4-4

If you have any questions regarding this response, please call me at (213) 897-1338.

Wilford Melton

WILFORD MELTON
Senior Transportation Planner
IGR/CEQA Coordinator
Office of Advance Planning

RECEIVED
JAN 11 1995
STATE CLEARINGHOUSE

cc: Mr. Charles W. Carry
Chief Engineer and General Manager
County Sanitation Districts of Los Angeles County
1955 Workman Mill Road
Whittier, CA 90601-1400
Attention: Gary Yoshida

4-1. In response to this comment, a level of service (LOS) analysis was conducted for the Pacific Coast Highway or State Route 1 (SR 1)/Figueroa Street intersection for the morning and evening peak hours during the period when construction activities generate the most traffic. The Intersection Capacity Utilization (ICU) methodology was used for this analysis.

Existing morning and evening peak-hour turning movement counts were conducted at the SR 1/Figueroa Street intersection in February 1995. Figure 7-6, which has been added to the final EIR (see Chapter 3), shows the existing turning movement volumes at this intersection. Results of the ICU analysis are shown in Table 7-4a (see Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR"). Results indicate that this intersection is currently operating at LOS F during the morning peak hour and at LOS E during the evening peak hour.

The number of construction employees at the JWPCP will be highest between July 1999 and June 2002 when several contracts overlap. During this period, an average of about 255 construction employees would be present at the JWPCP site. Table 7-3 in the draft EIR presents a summary of the construction trip generation analysis for the JWPCP construction activities.

To account for the background traffic growth that may occur at the SR 1/Figueroa Street intersection by 2002, a growth rate was applied to the existing traffic volumes. Because the trends show that the traffic volumes on SR 1 in the vicinity of Figueroa Street have declined in the last few years (California Department of Transportation 1990 and 1993), a growth rate of 1% per year was applied to the 1995 traffic volumes to project the 2002 volumes.

Figure 7-6 shows the projected 2002 turning movement volumes at the SR 1/Figueroa Street intersection and Table 7-4a shows the results of the ICU analysis for this intersection. The increase in morning and evening traffic volumes caused by construction employees would not increase above the threshold of significance established by the Congestion Management Program for Los Angeles County (Los Angeles County Metropolitan Transportation Authority 1993). Therefore, this impact is considered less than significant. The draft EIR is hereby changed to incorporate the discussion of this less-than-significant impact. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR".

It should be noted that the capacity analyses performed in the draft EIR reflect a higher number of employees than are considered here. Since the capacity analysis was performed for the draft EIR, changes have been made to the construction schedule and, consequently, the number of construction employees needed for the

project has decreased. The analysis provided in the final EIR reflects the updated data, while the analysis in the draft EIR reflects a more conservative scenario.

4-2, 4-3. Oversize vehicles used to transport equipment or materials to the proposed project site will include multiple-axle tractor trailers transporting large processing equipment including pumps, compressors, tanks, engines, separation towers, and materials such as structural steel members. Oversize vehicles could also transport large and heavy construction equipment such as cranes, tracked excavators, and bulldozers. The construction contracts will restrict use of these transport vehicles to off-peak hours. Contractors transporting equipment or hazardous waste materials to the project site via state freeways or highways would be required to obtain transportation permits from Caltrans. No change to the draft EIR is required.

4-4. Shipment of hazardous materials or waste to or from the Districts' facilities will be performed by licensed private contract haulers who comply with applicable federal and state regulations regarding equipment certification, personnel training, and documentation. These regulations are enforced by the California Highway Patrol. Bulk shipments and storage are arranged whenever possible to minimize the number of trips required.

Because of the JWPCP's proximity to the Sepulveda Boulevard off-ramp from the Harbor Freeway (I-110), truck transport of chemicals and other hazardous materials to and from the JWPCP is generally via I-110. Vehicles exit I-110 at Sepulveda Boulevard, travel east to Figueroa Street and south to the JWPCP. Additionally, the AT-SF Railroad has sidings at the JWPCP for material transported by railcar. No change to the draft EIR is required.

Letter 5

STATE OF CALIFORNIA - CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

STATE WATER RESOURCES CONTROL BOARD
DIVISION OF CLEAN WATER PROGRAMS
2014 T STREET, SUITE 130
P.O. BOX 944212
SACRAMENTO, CA 94244-2120
(916) 227-4525
(916) 227-4595 FAX

JAN 17 1995

Mr. Gary K. Yoshida
Division Engineer
Planning and Property Management
County Sanitation Districts of Los Angeles County
1955 Workman Mill Road
Whittier, CA 90601-1400

Dear Mr. Yoshida:

REVIEW OF ENVIRONMENTAL IMPACT REPORT (EIR): COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY, JOINT OUTFALL SYSTEM 2010 MASTER FACILITIES PLAN, STATE CLEARINGHOUSE NO. 94021011, STATE REVOLVING FUND (SRF) LOAN NO. 4001-220, FINAL INCREMENT SECONDARY TREATMENT

Thank for the opportunity to review the above-referenced document. The EIR is adequate for our purposes and we have no comments. 5-1

We look forward to continuing to work with you and the U.S. Environmental Protection Agency to coordinate SRF loan program requirements with National Environmental Policy Act reviews necessary because of the 1994 special appropriation from Congress for this project. We hope this coordinated effort will eliminate redundant work for you whenever it is possible to do so.

As part of the SRF review process, on November 18, 1994, we circulated the draft EIR to agencies responsible for implementing federal environmental laws and regulations. The time has passed for comments and only the U.S. Fish and Wildlife Service (Service) has responded. The Service has requested, and we have granted, a time extension to January 26, 1995.

On December 6, 1994, we received concurrence from the State Historic Preservation Office on our Determination of No Effect for this project. 5-2

If you have any questions, please feel free to contact me at (916) 227-4525.

Sincerely,

Christine Bailey

Christine Bailey
Environmental Services Unit

cc: State Clearinghouse
1400 Ninth Street
Sacramento, CA 95814

Los Angeles Regional Water
Quality Control Board
101 Centre Plaza Drive
Monterey Park, CA 91754-2156

Ms. Elizabeth Borowiec
U.S. EPA, Water Management Division
75 Hawthorne Street
San Francisco, CA 94105-3901

Al Herson/Maggie Townsley
Jones & Stokes
2600 V Street, Suite 100
Sacramento, CA 95818-1914

Response to Comments from the State Water Resources Control Board

5-1. The SWRCB's review and concurrence with the contents of the draft EIR are hereby noted.

5-2. Concurrence from the State Historic Preservation Office on the Determination of No Effect for this project is hereby noted.

Letter 6

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION

Rodney E. Cooper, Director

December 5, 1994

Mr. Charles W. Carry
Chief Engineer & General Manager
SANITATION DISTRICTS
County of Los Angeles
1955 Workman Mill Road
Whittier, CA 90601-1400

Attention: Mr. Gary Yoshida

Dear Mr. Carry:

DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT
FOR THE JOINT OUTFALL SYSTEM
2010 MASTER FACILITIES PLAN

Thank you for the opportunity to review and comment on the Draft Joint Outfall System 2010 Master Facilities Plan/Program EIR. The Draft 2010 Plan thoroughly addresses long term waste water treatment, use of reclaimed water and disposal needs for the County through the year 2010. The Department has prioritized the use of reclaimed water at selected facilities and anticipates future expansion of its use of reclaimed water.

The Program Alternatives 3 and 4 respectively, would impact the Whittier Narrows Recreational Area, which is leased by the Department from the Army Corps of Engineers. This impact would consist of the loss of riparian scrub and forest habitat which provides potential breeding habitat for the least Bell's vireo. The least Bell's vireo is classified as an endangered species according to both state and federal Endangered Species Acts.

The document also states that, "impacts can be mitigated to a less than significant level, by restoring riparian scrub and forest habitats" (Page ES 8 of the Executive Summary). This potential loss of habitat would result from construction activity for the Whittier Narrows Water Reclamation Area expansion fill roadway and the alignment of an approximately 2 mile long trunk sewer system, south of the proposed expansion area. 6-1

As indicated by a discussion with Mr. Sagar Raksit of your staff, Alternatives 3 and 4 are only conceptual program plans and are not the recommended or preferred program alternatives. 6-2

Potential impacts to County facilities cannot be assessed until an alignment for the trunk sewer system has been determined. 6-3

If you have any questions regarding this matter, please contact Frank Moreno, Jr. at (213) 738-2972.

Sincerely,

Joan Rupert

Joan A. Rupert
Departmental Facilities Planner II

cab2:1105jr1

Response to Comments from the County of Los Angeles Department of Parks and Recreation

6-1. The alignments of proposed sewer projects identified in the 2010 Plan, including the alignment for a 2-mile-long trunk sewer proposed under Alternative 4, cannot be accurately defined at this time. Therefore, the environmental impact analysis conducted in the draft EIR was on a program level. However, the Districts typically locate sewers in existing public rights-of-way to minimize disruption of access, services, and utilities to private property and to reduce other impacts. If the Districts decide to construct this sewer, the Districts will consider alignment options and evaluate each alignment based on cost and potential impacts. As stated on page 11-20 of the draft EIR, constructing the proposed sewer would not result in the loss of sensitive biological communities because the Districts plan to avoid such communities. No change to the draft EIR is required.

6-2. The draft EIR identifies the recommended alternative as "Alternative 1: Upgrade JWPCP/Expand Los Coyotes WRP/San Jose Creek WRP". Modifications to the Whittier Narrows WRP are not proposed under the recommended alternative. If the Districts were to consider expansion of the Whittier Narrows WRP at a future date, they would need to evaluate the environmental impacts on the project level under a separate environmental review process.

6-3. Several potential impacts related to sewer relief are identified in the draft EIR. The impacts were determined to be less than significant based on standard construction practices implemented by the Districts and the location of sewer alignments along existing roadways and paved areas. Also, see response to Comment 6-1.

Letter 7

City of El Segundo

DEPARTMENT OF PLANNING
AND BUILDING SAFETY
• City Hall • 350 Main Street • El Segundo, California 90245-3813
• (310) 322-4670 • FAX (310) 322-4167

HYRUM B. FEDJE
Director

December 21, 1994

Charles W. Carry
Chief Engineer and General Manager
County Sanitation Districts of Los Angeles County
1955 Workman Mill Road
Whittier, CA 90601-1400
Attention: Gary Yoshida

Re: Draft Program Environmental Impact Report (EIR) for the Joint Outfall System 2010 Master Facilities Plan

Dear Mr. Carry:

The City of El Segundo has reviewed the Draft Program Environmental Impact Report (EIR) for the Joint Outfall System 2010 Master Facilities Plan. The City appreciates the opportunity to comment on the project and would like to submit the following comments to be incorporated into the Final EIR to allow for a more accurate assessment of the project's impacts:

1.) The area east of Sepulveda Boulevard in El Segundo is served by the LACSD. The service charge and the connection fee for the properties in this area will be increased (pages 2 - 8) to finance the program. Although the actual fee increase is not known at this time, the City is concerned about the economic impact that the increase may have on businesses in El Segundo. 7-1

2.) The construction activities to implement the program should indicate the impacts for the "maintenance of facilities including roads" under the Public Facilities Section of the Table 3 checklist (pages 3 - 17). The document currently indicates no impact. 7-2

Again, thank you for the opportunity to comment. We look forward to receiving the Final EIR. If you have any questions, please contact Jean Baaden at (310) 322-4670, Ext. 402 or any other Planning Division staff member.

Sincerely,

Hyrum B. Fedje
Director of Planning
and Building Safety

cc: Jim Morrison, City Manager
EIR Response File

7-1. Project financing is discussed in Section 7.5 of the 2010 Plan. As indicated in that section, different elements of the 2010 Plan will be funded through separate financial programs: service charge and connection fee programs. Existing users of the sewerage system will fund the upgrade elements of the recommended alternative (Alternative 1) through their annual service (user) charges. Section 7.5 provides a more detailed analysis of the impact on the service charge rates.

New users will finance the expansion elements of the 2010 Plan through payment of connection fees. Under the existing Master Connection Fee Ordinance, connection fee rates are based on the next anticipated configuration of an expanded treatment plant. Because this anticipated configuration is already assumed to be a tertiary-level inland WRP with full associated downstream solids-handling facilities, the recommended alternative would have no effect on the connection fee rates for businesses in the City of El Segundo. No change to the draft EIR is required.

7-2. Page 3 of 5 in Table 3 of the notice of preparation (NOP) for the EIR (dated February 3, 1994) was developed by the Districts to identify potential impacts associated with the 2010 Plan. As stated in the NOP, the identification of the potential impacts did not necessarily mean that the impact would occur, only that there was potential for the impact to occur. In the draft EIR, the Districts identified several construction-related impacts on roadways; where impacts were found to be significant, the Districts proposed mitigation to reduce the impacts to less-than-significant levels. Chapter 7 of the draft EIR identifies increased traffic on existing roadways, alteration of current vehicle circulation, and increases in traffic hazards from construction activities.

Mitigation measures proposed in the draft EIR for air quality impacts resulting from construction at the JWPCP also address concerns related to the maintenance of roads. Specifically, the Districts propose to water active sites at least twice daily, pave the first 100 feet of all unpaved, heavily traveled construction roads on the site and sweep streets at the end of the day with water sweepers if visible soil is carried onto adjacent public roads. No change to the draft EIR is required.

Letter 8

COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES CALIFORNIA 90063-3294

(213) 881-2481

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

December 21, 1994

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

Attention Gary Yoshida

Dear Mr. Carry:

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT – JOINT OUTFALL SYSTEM 2010 MASTER FACILITIES PLAN, SCH #94021011

There is a factual error in the Fire Protection - Local Setting Section in Chapter 14. The first Paragraph on Pages 14-7 states that Stations #87 and #90 can supply three engines to the San Jose Creek WRP. Please note that these stations have only one engine company each. 8-1

FORESTRY DIVISION

We have reviewed the Draft Environmental Impact Report for the Joint Outfall System 2010 Master Facilities Plan located at the County Sanitation Districts of Los Angeles County.

The areas germane to the statutory responsibilities of the Forestry Division have been addressed.

If you have any additional questions, please contact this office at the phone number shown above.

Very truly yours,

Michael A. Allbaugh for

PAUL H. RIPPENS, CHIEF, FORESTRY DIVISION
PREVENTION BUREAU

PHR:jmb

8-1. The draft EIR is hereby changed to state that stations #87 and #90 can each supply one engine to the San Jose Creek WRP. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR".

Letter 9

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone (818) 458-5100

HARRY W. STONE, Director

ADDRESS ALL CORRESPONDENCE TO
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

February 13, 1995

IN REPLY PLEASE REFER TO FILE H-2

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

Attention Mr. Gary Yoshida

Dear Mr. Carry:

JOS 2010 MASTER FACILITIES PLAN

We have reviewed the draft Joint Outfall System 2010 Master Facilities Plan and Environmental Impact Report and have the following comments:

JOS Draft Plan

1. Page 2-8, last paragraph - The entire reach of Rio Hondo Channel downstream of Whittier Narrows Dam is lined with concrete. 9-1

2. Page 2-21, last paragraph

   a. Rio Hondo Coastal Basin Spreading Grounds is operated and owned by the Los Angeles County Department of Public Works (LACDPW).

   b. San Gabriel Coastal Basin Spreading Grounds is operated by the LACDPW. However, it is only partially owned by us. We have a long-term lease for the grounds. The operation and maintenance of the river was transferred to us on April 29, 1969 by the U.S. Army Corps of Engineers. 9-2

   c. Both spreading grounds are operated on a battery cycle. The time it takes to fill a battery is dependent upon the inflow, size of the battery, and the percolation rate.

   d. The water is switched to another battery to disrupt the breeding cycle of vectors and to allow the battery to rejuvenate and restore the percolation rate.

   e. San Gabriel Coastal Basin Spreading Grounds has an inflow capacity of 350 cfs (226 mgd) and Rio Hondo Coastal Basin Spreading Grounds has an intake capacity of 2,000 cfs (1293 mgd). 9-2

3. Page 3-1, Table 3.1-1 - Waste Discharge and water reuse permits expired in August 1994 for Long Beach, Los Coyotes, Whittier Narrows, and Pomona Water Reclamation Plants (WRP); the permits for the San Jose Creek WRP expired in March 1994. Have these permits been renewed or extended? If so, the JOS Plan should state the new expiration date(s). 9-3

4. Page 3-11, last paragraph - The official name for San Gabriel Spreading Grounds is San Gabriel Coastal Basin Spreading Grounds. This facility consists of two batteries: a) the off-channel spreading grounds and b) the river basins. 9-4

5. Figure 4.1-2

   a. Water from SJCWRP can be spread at either Rio Hondo or San Gabriel Coastal Basin Spreading Grounds. 9-5

   b. Likewise, for water from WNWRP.

   c. Reimbursement for the reclaimed water is made by the Water Replenishment District (WRD) but the water is spread by the LACDPW.

6. Page 4-4, third paragraph - The WRD does not spread the water. The water is spread at LACDPW groundwater recharge facilities. We operate the facility, control the inflow, and determine where the water is spread. 9-6

7. Page 4-6, last paragraph - Same comments as noted in Item No. 6. 9-7

8. Page 5-40, third paragraph - Revise the title WRD of Southern California to LACDPW. 9-8

9. Page 5-49 - Same comment as noted in Item No. 8. 9-9

10. Page 5-54, third paragraph - The Main San Gabriel Basin includes the following LACDPW groundwater recharge facilities: 9-10

a.	Ben Lomond S.G.	e.	Irwindale S.B./Manning Pit
b.	Buena Vista S.B.	f.	Peck Road Water Conservation Park
c.	Citrus S.G.	g.	Walnut S.B.
d.	Eaton S.B.	h.	Santa Fe S.G.

The only facility capable of replenishing 28,000 AF is Santa Fe Spreading Grounds. 9-10

11. Page 5-55, second paragraph - This paragraph discusses the work that WRD initiated but the facilities are operated by the LACDPW. 9-11

12. Page 6-102, third paragraph - Typographical error; VSS, not VVS should be used for volatile suspended solids. 9-12

Draft EIR

1. Page 3-4, third paragraph

   a. The Rio Hondo Channel originates from the spillway of Peck Road Water Conservation Park.

   b. Flow data for the Rio Hondo Channel is available from Gaging Station Nos. F192B-R, F64-R, and F45B-R. Gaging Station F45B-R is the last station on the Rio Hondo Channel before the confluence with the Los Angeles River.

   c. Flow data for the Los Angeles River is available from Gaging Station Nos. F300-R, F285-R, F57C-R, F34D-R, and F319-R. Station F319-R is the last gaging station on the Los Angeles River before it discharges to the Pacific Ocean. 9-13

   d. The above-noted gaging station data is available to the public and can be obtained at the LACDPW's public counter in Hydraulic/Water Conservation Division or by contacting Mr. George Farag of that Division at (818) 458-6112. In addition, the U.S. Army Corps of Engineers also has gaging stations on the Rio Hondo Channel and Los Angeles River.

2. Page 3-10, second paragraph

   a. Rio Hondo Coastal Basin Spreading Grounds has 430 acres of wetted area.

   b. San Gabriel Coastal Basin Spreading Grounds has a total of 252 acres of wetted area, 96 acres in the off-channel spreading grounds, and 156 acres in the river basins. 9-14

   c. Remove the parenthetical documentation "(County Sanitation Districts of Los Angeles City, 1992b)."

3. Page 3-10, third paragraph - Please refer to our Comment No. 2 under JOS Draft Plan on page 2 of this letter. 9-15

4. Page 3-24, first paragraph - Use either Los Angeles County Flood Control District or LACDPW not DPW Flood Control Division. 9-16

Please contact Mr. Cung Nguyen at (818) 458-6302 if you have any questions or if we may be of assistance.

Very truly yours,

HARRY W. STONE
Director of Public Works

ROBERT D. PEDIGO
Hydraulic/Water Conservation Division

CTN:adg
JOSPLN

Response to Comments on the Draft 2010 Plan

9-1. Change made to Section 2.1.3, page 2-8, final paragraph.

9-2. Changes made to Section 2.2.4, page 2-21, Central Groundwater Basin subsection.

9-3. The permits for these plants have been extended until the Regional Water Quality Control Board considers the applications for their renewal, which have been submitted by the Districts. No change to the Draft 2010 Plan is required.

9-4. Changes made to Section 3.1.2, page 3-11, final paragraph.

9-5. Comment noted. At both sites, the reclaimed water is purchased by the Water Replenishment District and recharged in facilities operated by the Los Angeles County Department of Public Works. No change to the Draft 2010 Plan is required.

9-6. Changes made to Section 4.1.1, page 4-4, third paragraph.

9-7. Changes made to Section 4.1.1, page 4-6, last paragraph.

9-8. Change made to Section 5.5.2, page 5-40, title has been revised to read: "San Gabriel Coastal Basin Spreading Grounds/Rio Hondo Coastal Basin Spreading Grounds."

9-9. Change made to Section 5.5.2, page 5-49, title has been revised to read: "San Gabriel Coastal Basin Spreading Grounds/Rio Hondo Coastal Basin Spreading Grounds."

9-10. Comment noted. The proposed recharge would occur at the Santa Fe Spreading Grounds. No change to the Draft 2010 Plan is required.

9-11. Comment noted. No change to the Draft 2010 Plan is required.

9-12. Change made to Section 6.13.1, page 6-102, third paragraph.

Response to Comments on the Draft EIR

9-13. The draft EIR is hereby changed to reflect these corrections. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR".

9-14. The draft EIR is hereby changed to reflect these corrections. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR".

9-15. The draft EIR is hereby changed to reflect these corrections. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR".

9-16. The draft EIR is hereby changed to reflect these corrections. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR".

Letter 10

CITY OF CERRITOS

CIVIC CENTER • 18125 BLOOMFIELD AVENUE • P.O. BOX 3130
CERRITOS, CALIFORNIA 90703-3130 • FAX: (310) 865-7277
PHONE: (310) 860-0311 • (714) 523-3710

January 3, 1995

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

Dear Mr. Carry:

RE: REVIEW OF THE DRAFT OUTFALL SYSTEM 2010 MASTER FACILITIES PLAN AND THE DRAFT ENVIRONMENTAL IMPACT REPORT

Thank you for your letter dated November 14, 1994, requesting that the City of Cerritos review and comment on the draft Outfall System 2010 Master Facilities Plan, and the draft Environmental Impact Report. We recognize that your staff is reviewing various alternatives designed to meet the wastewater management needs of the District's Joint Outfall System (JOS).

We have reviewed the four proposed alternatives which are outlined in the plan. The City is primarily concerned with any modifications proposed at the Los Coyotes Plant in Cerritos because the City-owned and operated Iron-wood Golf course and driving range may be impacted. 10-1

Upon reviewing the four alternatives, the City prefers Alternative #3 which involves no modifications to the Los Coyotes Plant as our first choice. The City's next preference is Alternative #1 which involves increasing the capacity of the Los Coyotes Plant from 37.5 mgd to 50 mgd. However, this expansion will be to the south of the existing driving range and will not impact any existing City facilities. Alternatives #2 and #4 are the least desirable options to us. 10-2

Should the District select Alternative #1 as its primary choice, the City would request that the District provide a Traffic Management Plan which would include the storage of on-site material and equipment, mitigation of any vehicular/pedestrian circulation and noise concerns, and a landscaping plan which would address aesthetic concerns. The City would strongly oppose Alternatives #2 and #4 if they were selected because of their substantial impact on the City's recreational facility. 10-3 10-4

We are requesting that your office keep us informed relative to any final decisions which may develop regarding this matter. If you have any questions or desire any additional information from my office, please feel free to contact Ron Babel, Water Superintendent at (310) 860-0311, Ext. 245 at your convenience. 10-5

Sincerely,

Vince Brar
Director of Public Works

10-1. As explained on page 12-7 of the draft EIR, the land on which the Ironwood Golf Course and Driving Range is located is owned by the Districts and has been leased to the City of Cerritos by the Districts since 1975. The lease agreement allowed the city to develop the property for open space landscaping and park and recreational uses until the land would be required for wastewater treatment plant expansion. All proposed modifications to the Los Coyotes WRP would occur on Districts-owned land. It should be noted, however, that the proposed modifications to the Los Coyotes WRP under the Districts' recommended alternative (Alternative 1) would not require the use of the driving range or golf course (See Figure 2-9 in the draft EIR). No change to the draft EIR is required.

10-2. The Districts recognize the city's desire to minimize effects on the existing golf course and driving range and have made several design modifications to the Los Coyotes WRP expansions under each of the alternatives to minimize impacts. Impacts from the proposed modifications at the Los Coyotes WRP are identified in several resource areas of the draft EIR and mitigation measures to reduce these impacts, where appropriate, are proposed. No change to the draft EIR is required.

10-3. Several mitigation measures identified in the draft EIR already address the issues raised by the city. Mitigation Measure 7-1, described on pages 7-17 and 7-18 of the draft EIR, calls for the development and implementation of a traffic control plan to minimize the effects of construction activities on the roadway system. Mitigation Measure 9-1, described on pages 9-16 and 9-17 of the draft EIR, calls for the implementation of noise-reducing construction practices to minimize construction noise.

Mitigation Measure 15-1, described on page 15-10 of the draft EIR, calls for the location of staging, equipment storage, and construction material storage areas outside visually sensitive areas where feasible. If this is not feasible, this measure requires that these areas be screened from general view. Furthermore, Mitigation Measures 15-5, 15-8, and 15-10 call for partially screening new project elements from public view, establishing parkway planting strips, and improving existing greenbelt areas to minimize visual effects of project operations. No change to the draft EIR is required.

10-4. See response to Comments 10-1 and 10-2.

10-5. The City of Cerritos is on the distribution list for the final EIR and updates on 2010 Plan activities, including public information meetings and public hearings relevant to the Los Coyotes WRP. The Districts will also keep the city apprised of any proposed modifications to the Los Coyotes WRP that might affect the city.

Letter 11

CITY OF LOS ANGELES
CALIFORNIA

CITY PLANNING COMMISSION
MARNA SCHNABEL PRESIDENT
LES HAMASAKI VICE PRESIDENT
ROBERT S SCOTT
SHELLY S SUZUKI
ANTHONY M R ZAMORA
RAMONA HARO SECRETARY
(213) 485-5071

RICHARD J RIORDAN
MAYOR

DEPARTMENT OF CITY PLANNING
ROOM 561 CITY HALL
200 N SPRING ST
LOS ANGELES CA 90012-4801
CON HOWE DIRECTOR
FRANKLIN P EBERHARD DEPUTY DIRECTOR
(213) 237-1066
MELANIE S FALLON DEPUTY DIRECTOR
ROBERT H SUTTON DEPUTY DIRECTOR
(213) 237-1818
FAX (213) 237-0552

January 6, 1995

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

RE: JOINT OUTFALL SYSTEM 2010 MASTER FACILITIES PLAN

Thank you for the opportunity to review the Draft Program EIR for the Joint Outfall System 2010 Master Facilities Plan. The Los Angeles City Planning Department, Community Planning Bureau has the following comments:

Land Use

The Joint Water Pollution Control Plant (JWPCP) site is located primarily within the City of Carson, however, a portion of the property south of Lomita Boulevard and East of the Harbor Freeway is located in the City of Los Angeles. That portion in Los Angeles is located within the Wilmington-Harbor City Community Plan which was adopted by the Los Angeles City Council on June 15, 1989. The District Plan's land use designation for the subject property is Open Space/Public/Quasi Public corresponding to the OS, A1 and PF zones. Currently the property is zoned R1, however, the City is in the process of changing the zoning east of Figueroa Street to OS and west of Figueroa Street to PF to correspond to the Plan. The expansion and upgrade of the JWPCP is planned only for the portion of the site located within the City of Carson. The use of the property within the City of Los Angeles is a recreation area east of Figueroa Street and an essentially unimproved publicly owned parcel containing some oil wells west of Figueroa Street. These uses are consistent with the Wilmington-Harbor City District Plan. 11-1

CITYWIDE PLANNING DIVISION
221 S FIGUEROA ST SUITE 410 LOS ANGELES CA 90012
TELEPHONE (213) 237-0127 FAX (213) 237-0141

Aesthetics

Objectives of the Wilmington-Harbor City District Plan include enhancing the aesthetic quality and design of the built environment and establishing a system of open space landscaped buffers for recreational and aesthetic purposes and for the separation of incompatible land uses. Mitigation measures should include extensive landscape buffers to screen the project from public view, reducing bulk of buildings and structures as much as possible, and placing any new power lines underground. 11-2

Transportation

It is an Objective of the Wilmington-Harbor City District Plan "to improve traffic safety and control industrial truck traffic in residential neighborhoods." It is also a policy of the Wilmington-Harbor City District Plan "to develop Designated Bikeways (...) in accordance with the standards and criteria contained in the Bicycle Plan, a part of the Circulation Element of the City's General Plan, to permit safe bicycle use and to link residents to other bikeway systems which provide access to schools and recreational facilities." The backbone bicycle trail system proceeds north along Figueroa Street to Lomita Boulevard, traveling east along Lomita Boulevard to Wilmington Street/Main Street and continuing north into the City of Carson. Mitigation measures contained in the EIR address industrial truck traffic safety, however the backbone bicycle trail system has not been addressed. 11-3

Air Quality

To contribute to the process of oxygen regeneration, cleansing of the air of harmful pollutants, and removal of air-born particulates, all projects should be landscaped for air quality enhancement. Trees used in such landscaping should be selected for their ability to maximize air quality benefits including absorption of gases that may contribute directly or indirectly to atmospheric warming, for their ability to maximize energy conservation and with a view to their long term maintenance requirements. The use of vines should be encouraged on walls, buildings, and structures. 11-4

Public Health

It is an objective of the Wilmington-Harbor City District Plan to reduce and manage the risks associated with the handling, storage,

transfer and disposal of hazardous materials and hazardous wastes. The Draft Program EIR discusses the potential for accidental release of acutely hazardous material at the JWPCP. This discussion focuses on the risks associated with the handling and storage of these materials on the plant site, but lacks discussion regarding the transfer and disposal of these materials off site. Particularly with the proximity of this plant to residential areas and schools, the DEIR should discuss the procedures for the transfer and disposal of these materials. 11-5

These comprise our comments on this project, if you have any further questions, please call Nancy Scrivner at (213) 485-6647.

Very truly yours,

CON HOWE
Director of Planning

Jack L. Sedwick
Jack Sedwick
Principal City Planner

CH:JS:ME:JY:NS
A ENRLTR WB.

11-1. Consistency of existing land uses at the JWPCP with the Wilmington-Harbor City District Plan is noted.

11-2. Mitigation Measure 15-5 described on pages 15-12 and 15-13 of the draft EIR, calls for partially screening new project elements from public view. Mitigation Measure 15-7, described on page 15-13 of the draft EIR, calls for restricting structures to minimum necessary heights (e.g., proposed digesters along streets would range in height from 15 to 18 feet and have diameters of approximately 125 feet) and reducing large-scale elements to smaller component elements as feasible.

Additionally, the proposed digesters would be painted in shades of brown earth tones and the total height of 15-18 feet would include a 3-foot-high screen wall constructed of painted metal to shield motorists' views of piping and equipment from Figueroa Street and Lomita Boulevard. The Districts have designed the other proposed structures to minimize the scale and have proposed new landscaping that will blend with the existing landscape to the extent feasible.

The Districts do not anticipate the need for additional power lines because the current demand for power is substantially below the existing capacity of transmission facilities. To the extent feasible, all new onsite power lines will be underground. No change to the draft EIR is required.

11-3. Mitigation Measure 7-1 in the draft EIR is hereby changed to include safety provisions for bicyclists on the bicycle backbone trail in the project area. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR".

11-4. Mitigation Measure 15-8 in the draft EIR specifically calls for the establishment of parkway planting strips and trees along the north and south sides of Lomita Boulevard, along Figueroa Street south of Lomita Boulevard, and around the perimeter of the Wilmington Jay-Cee athletic field. Bougainvillea vines are planted along certain perimeter chain-link fences to add color, improve aesthetics, and discourage trespassing. Vines, however, are not planted against walls or buildings at the JWPCP because of maintenance issues associated with the vines. No change to the draft EIR is required.

11-5. See response to Comment 4-3. Also, all hazardous materials used in quantity by the Districts are consumed in the treatment process, and the containers in which they are delivered are returned to the manufacturer. No change to the draft EIR is required.

Letter 12

DEPARTMENT OF PUBLIC WORKS
205 South Willowbrook Ave.
Compton, California 90220
(310) 605-5505

ANGEL ESPIRITU
Director

CITY OF COMPTON

February 6, 1995

MR. CHARLES W. CARRY
CHIEF ENGINEER AND GENERAL MANAGER
COUNTY SANITATION DISTRICTS OF LA CO.
1955 WORKMAN MILL ROAD
WHITTIER, CA 9061-1400

Atten: Mr. Gary Yoshida

RE: Joint Outfall System 2010 Draft EIR

The report deals mainly on the expansion and upgrade of the various existing Wastewater Treatment Plants to secondary treatment system to comply with- Consent Decree, and to accommodate wastewater increase through the year 2010. This report did not address any specific work in connection with the collection of wastewater and/or distribution systems for "gray" water to existing and potential users. 12-1

Since these wastewater treatment plants are miles away from the City of Compton, such project seem to have no immediate or direct impact to the City, at this time.

Should there be any work to be done within the City in connection with these projects, whether it will be on the collection system or distribution system, it will be necessary that you provide us with the studies and plans for our review in connection with the City's requirements; it's environmental impact; or on other factors affecting the health, convenience, social and economic life of the citizens. 12-2

Additionally, there is a need to provide the City with access to the use of reclaimed or "gray" water for landscaping, irrigation, and other non-potable, non-toxic uses, such as for street cleaning, storm drain cleaning, concrete mixing, etc. Accordingly, extension and/or stub-outs for such reclaimed water distribution mains should be constructed to the City limits on major arterial streets, parks, etc., such as on Rosecrans Avenue, Compton Boulevard and Alondra Boulevard, to name a few.

Thank you for giving us this opportunity to comment on this EIR.

Sincerely,

DANTE SEGUNDO
ACTING DIRECTOR/PUBLIC WORKS

DS/b

cc: City Manager
Assistant City Manager
Planning Director
Water Dept. Manager

12-1. Reclaimed water (different from "gray water", which is used, untreated water) produced at the inland WRPs is not sold by the Districts to reclaimed water users. The Districts sell reclaimed water produced at the inland WRPs to water purveyors or other agencies who supply reclaimed water either directly or indirectly to water consumers. The Districts' primary role in promoting reuse is providing the resource to be reused. The Districts have attempted to take more of a lead role in the distribution of reclaimed water. However, these efforts have been impeded in the past because of statutes that discourage service duplication.

Such statutes discourage the use of reclaimed water because they could subject the Districts or other entities wishing to purvey reclaimed water to litigation for damages from the local potable water retailer. Instead of taking the lead role in distribution of reclaimed water, the Districts continue to encourage and work with local water districts and retailers to develop water reuse programs that work cooperatively within the limits of existing statutes. The Districts also have an ongoing monitoring program to identify the need for modifications or improvements to JOS wastewater collection facilities. No change to the EIR is required.

12-2. The Districts would coordinate with the City of Compton regarding any potential subsequent sewer projects or other Districts-sponsored projects requiring work within city limits. However, because the Districts cannot take the lead on reclaimed water distribution projects for reasons described above, other agencies would sponsor these projects. No change to the draft EIR is required.

Letter 13

MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Office of the General Manager

January 27, 1995

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 Mr. Carry:

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

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.

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

Page 1-10, 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. 13-1

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. 13-2

Page 14-1, last paragraph, first sentence should read:
MWD is composed of member cities, municipal water districts and a county water authority. 13-3

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. 13-4

Page 14-2, second paragraph, fourth sentence:
Please add Raymond Basin to the list of adjudicated groundwater basins within the JOS service area. 13-5

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. 13-6

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 13-7

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).

13-7

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:

13-8

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:

13-9

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:

13-10

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

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.

13-10

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.

13-11

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.

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.

13-11

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.

13-12

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 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.

13-12

- 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.

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. 13-13

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. 13-14

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. 13-15

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. 13-16

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. 13-17

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. 13-18

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 13-19

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)[1]

	Average Year Supply	Dry Year Supply
Existing Supplies		
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[2]	1.54	1.14
Total	3.98	3.33
Potential Supplies		
Additional Colorado River	0.45	0.45
Additional State Water Project[2]	0.40	0.40
Reclaimed Water	0.27	0.27
Groundwater Recovery	0.11	0.20
Total	1.23	1.32
Total Supplies	5.21	4.65

[1]Metropolitan is currently engaged in the IRP process and all supplies and programs are being re-evaluated.
[2]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.

13-29

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.

13-30

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.

13-31

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

13-32

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.

13-32

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,

Debra C. Man

for Brian G. Thomas
Assistant Chief
Planning and Resources Division

MME

cc: Mr. Richard W. Atwater
General Manager
Central Basin Municipal Water District
17140 S. Avalon Boulevard
Suite 210
Carson, California 90746-1218

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. 13-19

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. 13-20

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. 13-21

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. 13-22

Page 2-66, first paragraph should read the same as Metropolitan's corrections to page 14-3, second bullet of the Program EIR. 13-23

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. 13-24

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. 13-25

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

Land-Fallowing 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. 13-26

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. 13-27

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. 13-28

Response to Comments on the Draft EIR

13-1. 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."

13-2. The draft EIR is hereby changed to state that Metropolitan Water District (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."

13-3. 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."

13-4. The draft EIR is hereby changed to reflect this correction. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR."

13-5. The draft EIR is hereby changed to reflect this correction. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR."

13-6. 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."

13-7. 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."

13-8. 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."

13-9. 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."

13-10. 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."

13-11. The draft EIR is hereby changed to reflect this correction. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR."

13-12. 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

13-13. Changes made to Section 2.5, page 2-57, first paragraph, lines 1-8.

13-14. Changes made to Section 2.5.1, page 2-57, second paragraph, lines 5-8.

13-15. Changes made to Section 2.5.1, page 2-57, third paragraph, lines 4 and 5.

13-16. Changes made to Section 2.5.1, page 2-57, fifth paragraph, continued on page 2-58, lines 1-9.

13-17. Changes made to Section 2.5.2, page 2-58, first complete paragraph, lines 4 and 5.

13-18. Changes made to Section 2.5.2, page 2-58, first complete paragraph, lines 15-18.

13-19. Changes made to Section 2.5.4, pages 2-65 and 2-66, Imported Water Supplies subsection, under Colorado River Aqueduct subheading.

13-20. 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.

13-21. Changes made to Section 2.5.4, page 2-66, Imported Water Supplies subsection, under State Water Project subheading.

13-22. Changes made to Section 2.5.5, page 2-67, Groundwater Recovery Program subsection.

13-23. Changes made to Section 2.5.5, page 2-67, Wastewater Reclamation subsection.

13-24. Changes made to Section 2.5.5, pages 2-67 and 2-68, Colorado River Programs subsection, under Surplus and Unused Water subheading.

13-25. 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.

13-26. Changes made to Section 2.5.5, page 2-69, Colorado River Programs subsection, under Land Fallowing Programs subheading.

13-27. Changes made to Section 2.5.5, page 2-69, Colorado River Programs subsection, under Colorado River Basin Regional Water Supply Solution subheading.

13-28. Changes made to Section 2.5.5, pages 2-69 through 2-71, State Water Project Programs subsection.

13-29. 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.

13-30. Changes made to Section 2.5.7, page 2-72, paragraph 2, line 1, and to Figure 2.5-7.

13-31. Changes made to Section 2.5.7, page 2-73, first paragraph.

13-32. Section 2.5.8 has been added to the final 2010 Plan.

Letter 14

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

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

January 17, 1994

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

RE: SCAG COMMENTS ON THE JOINT OUTFALL SYSTEM 2010 MASTER FACILITIES PLAN AND ASSOCIATED DRAFT PROGRAM EIR
SCAG No. I 9400560

Dear Mr. Yoshida:

Thank you for submitting the Joint Outfall System 2010 Master Facilities Plan and associated Draft Program EIR to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG assists cities, counties and other agencies in reviewing projects and plans for consistency with regional plans. The attached comments are based in part upon state and federal mandates, as noted herein. If you have any questions about these comments, please contact Glenn Blossom (213) 236-1876.

Sincerely,

Eric H. Roth

ERIC H. ROTH
Manager, Intergovernmental Review

Mr. Gary Yoshida
January 17, 1995
Page 2

SCAG Comments on the Joint Outfall System
2010 Master Facilities Plan and
Associated Draft Program EIR

PROJECT DESCRIPTION

The Master Facilities Plan has been prepared to continue to guide the orderly development of the Joint Outfall System (JOS) into the next millennium . The JOS is operated under a joint powers agreement between 15 individual sanitation districts. The JOS facilities include the Joint Water Pollution Control Plant (JWPCP), five water reclamation plants (WRPs), and an interconnected network of sewers and pumping plants.

The five WRPs are: the Long Beach (LBWRP), the Los Coyotes (LCWRP), the Pomona, The San Jose Creek (SJCWRP), and the Whittier Narrows.

The JWPCP provides advanced primary treatment to all influent wastewater plus secondary treatment to approximately 60 percent of the flow, followed by ocean disposal. The WRPs provide tertiary treatment and the reclaimed water is reused or discharged to inland waters. The JOS serves 72 cities and unincorporated areas and currently treats approximately 470 million gallons per day (mgd) of wastewater.

The Master Facilities Plan uses a forecast of the future population growth and changes in land use within the Districts' service area based on the proposed Growth Management Chapter of SCAG's 1993 Draft Regional Comprehensive Plan (RCP). Based on the projections available at that time, the JOS service population was expected to increase from approximately 4.4 million to 5.2 million between 1990 and 2010.

The preferred project alternative calls for 400 mgd of secondary treatment capacity at the JWPCP, a 25 mgd expansion of the SJCWRP, and a 12.5 mgd expansion of the LCWRP. No expansion of the LBWRP would be required under any of the alternatives that have been analyzed for this project.

THE OBJECTIVES OF THE JOS 2010 MASTER FACILITIES PLAN

The planning objectives of the Master Facilities Plan are to:

- Provide full secondary treatment for all JOS wastewater flows by December 31, 2002, as required by a Consent Decree between the Districts, the United States, the State of California, the Natural Resources Defense Council, and Heal the Bay; and

- Provide wastewater conveyance, treatment, and reclamation/disposal facilities to meet service area needs through the year 2010 in a cost-effective and environmentally sound manner.

CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The Growth Management Chapter (GMC) of the 1994 Regional Comprehensive Plan and Guide contains a number of policies that are particularly applicable to this program[1]. The following are selected growth management policies of the GMC in italics and SCAG staff comments regarding the consistency of the program with those policies:

- *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.*

  SCAG Staff Comments: Chapter 5 of the Draft EIR addresses the existing and projected water and wastewater characteristics pertaining to the program. It indicates that the demographic data that were used as the basis for sizing and timing the expansion of the wastewater treatment facilities were obtained from SCAG. Our staff review of that demographic data presented in the Draft EIR indicates that it differs slightly from the forecasts that were subsequently adopted by the SCAG Regional Council in June, 1994. The same conclusion holds true for the 1990 and 2010 population and employment data disaggregated by census tracts found in Appendix A-5.2-1. Pursuant to telephone conversations that were recently held between SCAG staff and County Sanitation Districts staff, SCAG will supply the updated demographic data to the Districts for inclusion in the Final EIR. Because of the relatively minor differences in these data sets, it is unlikely that this will necessitate any changes in the sizing or timing of the facility expansion program. All other aspects of the calculations and methodology for sizing and timing the wastewater treatment facilities contemplated by this program appear to be fully consistent with this regional policy. 14-1

- *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.*

  SCAG Staff Comments: The timing and location of these proposed wastewater treatment facility improvements appear to be consistent with the growth management policies for this service area which is slated to have a 17 percent increase in population between 1990 and 2010. 14-2

[1] See Endnote.

- *To 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 .....*

  SCAG Staff Comments: Wastewater treatment is a public service that is essential to a well-functioning, sustainable community or region. The proposed wastewater treatment facilities would be part of a complex system that will provide this much-needed public service. 14-3

- *To encourage mitigation measures aimed at preservation of biological and ecological resources.....*

  SCAG Staff Comments: The environmental documentation for the project contains thorough analyses of the impact of the project on biological and ecological resources and presents a full slate of mitigation measures which appear to be adequate to protect these resources, provided such measures are adopted as conditions of project approval. 14-4

CONCLUSIONS

This project appears to be one that (1) would be generally consistent with the Growth Management Chapter of the Regional Comprehensive Plan, and (2) would provide cities in the service area with sufficient wastewater treatment facility capacity to accommodate anticipated growth through the year 2010 and provide full secondary treatment to all JOS wastewater flows by December 31, 2002, as required by the Consent Decree. 14-5

- - -

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 ***Conformity*** 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. §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 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.

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Response to Comments on the Draft 2010 Plan

14-1. Responses are as follows:

- 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.

Response to Comments on the Draft EIR

14-1. The draft EIR is hereby changed to reflect this updated demographic data. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR".

14-2. Consistency of the proposed project with SCAG growth management policies for the JOS service area is hereby noted.

14-3. General support for the purpose of the proposed project is hereby noted.

14-4. Support for the assessment of project impacts on biological and ecological resources, as well as the associated mitigation measures included in the draft EIR, is hereby noted.

14-5. Consistency of the proposed project with the Growth Management chapter of the Regional Comprehensive Plan is hereby noted. The statement that the proposed project would provide sufficient wastewater treatment facility capacity to accommodate anticipated growth in the JOS service area through 2010 is also noted.

Letter 15

January 17, 1995

Mr. Charles W. Carry
Chief Engineer and General Manager
County Sanitation Districts of Los Angeles County
1955 Workman Mill Road
Whittier, CA 90601-1400 via FAX : 310-695-6139

Attention : Mr. Gary Yoshida

Dear Mr. Yoshida :

The Advisory Board of Ken Malloy Harbor Regional Park in Wilmington, California would like to provide the County *Sanitation Districts* of Los Angeles County the following comments on the Draft Program Environmental Impact Report for the Joint Outfall System 2010 Master Facilities Plan.

Our comments are summarized below; detail is provided on the attached.

1. **PHASE I DIGESTERS.** The Phase I Digesters at the Joint Water Pollution Control Plant (JWPCP-Carson), currently proposed for the upland adjacent to the JWPCP marsh, *should* be relocated. The upland habitat should be restored and the marsh itself expanded. **15-1**

   Rationale : The potential negative impacts associated with locating the digesters on this site will be entirely eliminated. Beneficial uses of the upland and wetland will be substantially improved.

2. **TERTIARY LEVEL RECLAIMED WATER.** The JWPCP upgrade should include provision for generation of approximately 8.0 millions of gallons per day (mgd) of tertiary level reclaimed water. This water must be suitable for use at the adjacent JWPCP marsh, Wilmington Drain and Machado (Harbor) Lake (1.0 mgd) and other appropriate local uses such as refinery processing (+5.0 md). **15-2**

   Rationale : Providing tertiary level capacity at JWPCP is consistent with overall policy objectives of the Districts' Master Facility Plan and will provide significant enhancement to the marsh and lake, improving both its natural resource values and quality of recreation uses.

3. **OTHER CONCERNS.** In addition to the above, the Advisory Board would like the Districts to consider the following items in the EIR.

   a. *Inconsistencies* between the proposed project and applicable general plans and regional plans. The EIR should provide greater detail in its discussion of the relationship between the project and the Los Angeles Region (4) Basin Plan of the Regional Water Quality Control Board. **15-3**

   b. Cumulative, growth-inducing, and growth-related impacts. The Draft Program EIR indicates that these projects impacts may be substantial but that the responsibly for implementing possible mitigation measures are the responsibility of other agencies or jurisdictions. (17-1). **15-4**

   c. Land Use. As part of a Program EIR it would be useful for the District to provide information regarding plans for the vacant land on the south of the JWPCP site. **15-5**

Much of the response provided is background information. The specific issues to which we hope the Districts will respond are indicated in the text.

A re-circulation of the project-specific portions the EIR, may be appropriate if, in response to comments received, details of mitigation measures related to impacts of the JWPCP upgrade are *substantially different* than those provided in this Draft. If some other mutually agreeable method of resolving any issues raised herein exists consistent with CEQA such re-circulation may not be necessary.

We appreciate the opportunity to provide these comments and looks forward to the successful implementation of the Final Joint Outfall System 2010 Master Facilities Plan.

Sincerely Yours,

Frank O'Brien
Advisory Board
Ken Malloy Harbor Regional Park
Wilmington, CA

BACKGROUND

Ken Malloy Harbor Regional Park (KMHRP) is a City of Los Angeles facility containing active recreation areas, riparian woodland, freshwater wetland and Machado (Harbor) Lake. The park is located approximately 1/4 mile southwest of the Districts' Joint Water Pollution Control Plant. KMHRP's surface waters and wetlands receive urban runoff from the surrounding 20 square mile area via County of Los Angeles flood control channels.

About 70% of this urban runoff enters the park from the County's Wilmington Drain. The Drain runs directly east of JWPCP and into the park's northern wetland. (No treated wastewater from JWPCP is known to enter the flood control system). Water flows from the park via an underground culvert into Los Angeles Harbor's West Basin.

The park is heavily used by residents from the surrounding areas of Carson, Wilmington and Harbor City, however water quality in lake and wetland is very poor. Extensive trash enters the system from flood control channels. The beneficial uses identified by the Regional Water Quality Control Board for Bixby Slough and Machado Lake are severely impaired.

Harbor Park and Wilmington Drain contain the last fragments of a wetland and riparian woodland once extensive in Wilmington and generally known as the Bixby Slough. The Districts' JWPCP was constructed on the northern portion of the Slough's wetland and the marsh under the Districts' jurisdiction at JWPCP is part of the historical Slough. **15-6**

Wetlands and riparian woodlands are "special status biological communities of high value to wildlife" as the Draft Program EIR indicates (11-4). The County of Los Angeles has designated the Slough a Significant Ecological Area (SEA).

The Advisory Board's comments principally focus on these special status biological communities : the potential negative environmental impacts which the project may create and opportunities for mitigation measures and enhancement programs for these areas.

RECOMMENDATIONS

We recommend relocating the Phase I Digesters and improving the marsh and surrounding area. We believe this is a feasible measure which will entirely eliminate possible negative environmental impacts associated with this project element. **15-7**

We also recommend making provision for approximately 8.0 mgd tertiary level reclaimed water at JWPCP. The Advisory Board recognizes that this proposal is a significant modification to the JWPCP upgrade as proposed in the Draft Program EIR.

The benefits which JWPCP tertiary capacity would provide are, we believe, substantial enough to warrant serious consideration for inclusion in the overall Master Facilities Plan. **15-8**

Tertiary water could be used onsite and at area industries. Unocal's Wilmington refinery has an 5.0 mgd requirement, for example.

In addition, reclaimed water at JWPCP Carson could be used for enhancement of the Bixby Slough wetlands, both on-site and down-line at Wilmington Drain and Harbor Park.

POLICY CONTEXT & CONSISTENCY WITH EXISTING PLANS

The recommendations are intended to be consistent with the goals of the Districts' Master Facilities Plan. Based on projected regional growth the Districts need to expand and upgrade their wastewater treatment plants. Relocating the Phase I digesters at JWPCP will eliminate direct potential negative environmental impacts associated with this expansion and upgrade at JWPCP and also mitigate negative impacts associated with growth within the JOS service area. **15-9**

Provision for generation of tertiary water at JWPCP will provide the Districts an opportunity for reclaimed water reuse. **15-10**

The proposals have also been developed consistent with the objectives set forth in the following :

Current federal wetlands policy. USEPA and others. August 1993.

State of California policy guidelines for wetlands conservation. Executive Order W-59-93. August 1993.

State of California Water Resources Control Board "Policy with Respect to Water Reclamation in California". 77-1.

State of California Regional Water Quality Control Board, Region 4 Basin Plan. April 28, 1994.

Los Angeles County Guidelines for Management of Significant Ecological Areas. August 1975.

A Consent Decree Negotiated Between the Districts, the United States, the State of California, the Natural Resources Defense Council and Heal the Bay. June 6, 1994.

City of Los Angeles General Plan, Wilmington-Harbor City District Plan. June 15, 1989.

Ken Malloy Harbor Regional Park Advisory Board, Master Plan. *March 17, 1994.*

The federal Clean Water Act and the California Porter-Cologne Water Quality Act provide the statutory basis for majority of the objectives detailed in the above. These laws, among others, are implemented in the Regional Water Quality Board's April 1994 Basin Plan.

Beneficial Uses and Water Quality Objectives identified in the Basin Plan for waters constitute the policy and statutory basis for the recommendation that JWPCP tertiary water be used for improving Bixby Slough/Machado [Harbor] Lake.

Technical elements of this proposal were first discussed in the "Machado Lake Reclaimed Water Issue Paper" developed by the City of Los Angeles Department of Environmental Affairs in the fall of 1991, and in the Port of Los Angeles' February 1992 "Machado Lake Restoration and Enhancement Plan".

The Advisory Board of Ken Malloy Harbor Regional Park consists of area residents, staff of City of Los Angeles Departments and of other agencies, and City, County, State and federal elected officials. Board recommendations are strictly those of resident Board members and are intended to result in the improvement of the park.

1. RELOCATE PHASE I DIGESTERS.

The proposed expansion of JWPCP [all alternatives] includes Phase I construction of seven digesters and a gallery on land immediately east of the JWPCP marsh. [Fig 11-2]. This project element would require replacing a number of greenhouses with industrial-type structures of unspecified height and appearance; [12-17], and directing an unspecified number of stormdrains into the marsh [11-19]. 15-11

The Draft EIR identifies a number of potentially significant environmental impacts from construction and operation of the Phase I Digesters. Mitigation measures are then proposed which would reduce these impacts to less-than-significant levels.

The Advisory Board recommends that the Phase I Digesters be relocated to another area of the facility, and that the entire land area north of the railroad tracks and west of Figueroa under the jurisdiction of the Districts be maintained as marshland and upland openspace. This would entirely eliminate the possibility of negative environmental impacts and provide a significant benefit. 15-12

The Draft Program EIR provides in Chapter 17 [Cumulative, Growth-Inducing, and Growth-Related Impacts] useful data on the importance of incorporating this proposed modification into the final project design. Chapter 17 states [17-12] :

> According to the SCAG RCP EIR, growth in the JOS service area could result in the substantial loss of the extent and quality of plan and wildlife habitat and sensitive biological communities. Dune, scrub, chaparral, herbaceous, marsh, riparian, woodland and forest communities would especially be affected. This impact is considered significant because the extent of sensitive biological communities in the JOS service area has been decreased substantially. (Southern California Association of Governments 1994a.)

And also [17-13] :

> Project-induced growth could contribute to the loss of substantial portions of special-status species habitat and 18 biological communities. Figure 11-1 shows areas supporting natural habitats in the JOS service area and outlying areas.

The Districts have jurisdiction over the JWPCP marsh and adjacent upland and therefore the ability to provide direct mitigation for both direct and indirect project impacts through a relatively minor modification in project design.

The Advisory Board defers to the judgement of District staff as to specific alternate locations for the Phase I Digesters.

Although this alternative seems feasible, and we strongly recommend it, a number of concerns exist about the mitigation measures for this project element.

The Draft does not provide enough information to evaluate the adequacy of the measures proposed to mitigate the impacts of locating the Phase I digesters directly adjacent to the wetland. In addition, some of the mitigation measures are planned to be developed at a future date after approval of the project.

We believe CEQA requires a Draft EIR discuss mitigation measures with a level of detail sufficient to permit meaningful evaluation of their adequacy. Further, development of mitigation measures may not generally be deferred until after certification of an EIR.

Areas of specific concern are provided below:

Mitigation Measure 3-1. Prepare and Implement a Stormwater Pollution Prevention Plan. [SWPPP]. The DEIR states "The contents of the SWPPP and details of the required BMPs [Best Management Practices] would be prepared by the Districts before they obtain the general construction activity stormwater permit from the RWQCB." and "The key to the SWPPP would be establishment of sediment and erosion control practices recommended by a qualified specialist."

Compliance by the Districts with the permit requirements of the RWQCB may constitute adequate mitigation for this potential impact. Detailing the provisions of the Stormwater Pollution Prevention Plan, and providing in the Draft the recommendations of a qualified specialist, might elicit suggestions which improve these measures. **15-13**

Mitigation Measure 11-1. Install Energy Dissipaters in Drainages into the Marsh. This mitigation measure will be installed "prior to completion of stormdrains into the marsh." **15-14**

In order to evaluate the adequacy of this mitigation measure, additional information is required on these drains, such as their number and anticipated size and the quality of stormwater which they will discharge into the marsh. **15-14**

Mitigation Measure 11-2. Prepare and Implement a Marshland Management Plan. "In cooperation with the Los Angeles County Department of Public Works, the Districts propose to prepare a marshland management plan to improve irrigation to the marsh and maintain the marsh."

This marsh is a "special status biological community of high value to wildlife" and is part of a Los Angeles County "Significant Ecological Area". **15-15**

Additional information is required to evaluate the adequacy of this proposed mitigation measure. Details of the measure should not be deferred until after approval of the project.

As proposed the plan might consist a few guys from the County's Imperial Maintenance Yard driving by twice a month to look out the window of their pick-up truck or construction of a lined trapezoidal low-flow channel. The specific elements the mash management plan might contain should be spelled out and an opportunity provided for public and agency evaluation and comment.

Other Potentially Significant Impacts of the Phase I Digesters Not Discussed by the Draft.

Land Use. Section 12 indicates that converting open space to developed use would constitute a significant impact. This potential impact from constructing the Phase I Digesters directly adjacent to the marsh on land now occupied by greenhouses is not adequately discussed. **15-16**

Aesthetics. Section 15 indicates that screening would be used between the complex of proposed digesters and Figueroa Street. This measure would "effectively screen 30% of the views within 10 years." **15-17**

From the information provided it is not clear if the screening proposed would be an adequate mitigation measure.

RELOCATE PHASE I DIGESTERS : Response requested

1. Please provide a revised project description which makes provision for relocation of the Phase I Digesters and complete restoration and enhancement of the JWPCP marsh and surrounding upland. **15-18**

The below only apply if the Phase I Digesters will not be relocated :

2. Should such a revision not be considered feasible, please provide a quantitative and technically detailed discussion of this determination. **15-19**

3. Please provide additional details about the Stormwater Pollution Prevention Plan. **15-20**

4. Please provide additional details about the stormwater and associated stormdrains which will be directed into the Marsh. **15-21**

5. Please provide a additional information on the Marshland Management Plan sufficient to evaluate its adequacy as a mitigation measure. **15-22**

6. Please explain how conversion of greenhouses, planting beds and open area adjacent to a sensitive biological resource does not constitute a significant land use impact. **15-23**

7. Please provide additional specific detail about the Phase I Digesters and the plantings which are intended to mitigate the potential negative impacts on the aesthetic qualities of the project site. **15-24**

2. TERTIARY LEVEL RECLAIMED WASTEWATER [8 mgd]

The Advisory Board recommends that provision be made within the Master Facilities Plan for the capacity for processing approximately 8 mgd of tertiary water at the Joint Water Pollution Control Plant. **15-25**

The Joint Outfall 2010 Master Facilities Plan has among its chief objectives an increase in the Beneficial reuses of reclaimed wastewater. **15-26**

As part of the Consent Decree, the Districts have agreed to prepare by December 31, 1995 a plan for reclaimed wastewater, and to use best efforts to attain and maintain within 7 years a goal of 150 mgd level of the Beneficial reuse of reclaimed wastewater.

Currently the District processes approximately 482 mgd of wastewater, 85% of capacity. Of this 482 mgd throughput, 330 mgd, or 68% is processed by JWPCP Carson, the remainder by the 5 Water Reclamation facilities.

Of the 152 mgd processed by the Water Reclamation facilities, 70 mgd, or 46%, is reused. None of Carson's wastewater is reused. As a result of this allocation of volume, currently 15% of total system wastewater throughput is reused.

Under Alternative 1 recommended in the Draft Program EIR, full system capacity in 2010 will be 628 mgd. Of that total, JWPCP represents 64%. **15-27**

However, no beneficial reuse of wastewater is projected under Alternative 1 (as well as the other project options). Even should the 150 mgd target established by the decree be achieved by 2010, 75% of all wastewater processed by the Joint Outfall System will not be reused. See Table I.

This allocation is not hard to understand.

The Draft Program EIR refers briefly to some of the technical issues involved : the Water Reclamation Plants convey their solid residuals to JWPCP, wastewater with high dissolved solids are routed around the Reclamation Plants to JWPCP, and the JWPCP service area has a higher concentration of industrial discharges than the WRs.

The Draft summarizes this simply : JWPCP processes "high strength" wastewater.

Costs and site configuration are also a factor. Upgrading JWPCP to provide tertiary water is probably not the most cost-effective way to achieve the 150 mgd beneficial reuse target.

Nevertheless we believe providing a modest 8 mgd tertiary processing capacity at JWPCP has merit.

Such a plan would allow for immediate realization of local beneficial uses within the JWPCP service area which will meet clearly identified local needs.

As proposed in the Master Facilities Plan, JWPCP will process about 60% of the system's wastewater but its service area will have access to none of the system's reclaimed water and the beneficial reclaimed water will provide. 15-27

This project design meets certain engineering and cost/benefits constraints, but there is a lack of proportion between the proposed project's potential negative impacts and the measures proposed to mitigate these impacts.

The existing Machado Lake enhancement plans developed by the Port of Los Angeles and City of Los Angeles Environmental Affairs Department proposed use of reclaimed wastewater for improving Bixby Slough and Harbor Lake.

The State Water Resources Control Board "Policy with Respect to Water Reclamation in California" identifies enhancement of wetlands as a priority use for reclaimed water.

TERTIARY LEVEL RECLAIMED WATER [8 mgd] : Response Requested

1. Please provide a brief but detailed evaluation of the feasibility of providing 8.0 mgd tertiary level reclaimed water at JWPCP as part of the Master Facility Plan.

   Please include in this evaluation an estimate of: 15-28

   1. Capital and on-going costs.
   2. Sales price of water produced per mgd
   3. Possible on-site and local beneficial uses for such water.
   4. Suitability of such water for wetland enhancement.
   5. Alternative projects [eg 2.5 mgd] which might achieve project objectives at ower cost.

3. **OTHER CONCERNS.** Please respond to the items indicated below :

a. Inconsistencies between the proposed project and applicable general plans and regional plans.

The JOS project goals include both expansion of capacity and increased beneficial use of reclaimed water. The Regional Water Quality Control Board's Basin Plan provides detailed discussion of Beneficial Uses and Water Quality Objectives for regional waters. Additional information on the consistencies or inconsistencies between the JOS Master Facilities Plan and the RWQCB Basin Plan should be provided. **15-29**

b. Cumulative, growth-inducing, and growth-related impacts. The Draft Program EIR indicates that these projects impacts may be substantial but that the responsibly for implementing *possible mitigation measures* are the responsibility of other agencies or jurisdictions [17-1] and cites CEQA Guidelines Section 15130[c] as follows: "..for some projects, the only feasible mitigation for cumulative impacts involves adopting ordinances or regulations rather than imposing project-specific conditions." **15-30**

Is it the case that responsibility for mitigating the significant growth-inducing environmental impacts from the project are rests entirely with other agencies and jurisdictions?

Is it the case that implementation of the mitigation measures identified in section 17 may not be implemented in whole or in part?

c. Land Use. Please provide information regarding plans for the vacant land on the south of the JWPCP site. **15-31**

I

JOINT OUTFALL SYSTEM
FACILITY CAPACITY and UTILIZATION [in MGD]

FACILITY	CURRENT CAPACITY	CURRENT VOLUME	% CAPACITY	RECLAIMED WATER USED	% USED	[illegible]	[illegible]
JWPCP	385.6	[illegible]	[illegible]	0.0	0.0%	[illegible]	[illegible]
SAN JOSE	100.0	[illegible]	[illegible]	42.0	53.2%	[illegible]	[illegible]
LOS COYOTES	37.5	[illegible]	[illegible]	4.0	[illegible]	[illegible]	[illegible]
WHITTIER	15.0	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
LONG BEACH	25.0	16.0	[illegible]	5.0	[illegible]	[illegible]	[illegible]
POMONA	13.0	10.0	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
SUBTOTAL	190.5	[illegible]	[illegible]	70.0	[illegible]	[illegible]	[illegible]
TOTAL	575.5	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Please Provide a correct version of this Table I in the Final EIR. **15-32**

15-1. The Phase I digesters are needed to accommodate the increase in solids generated from the full secondary treatment upgrade proposed for the JWPCP and from increased flows at the upstream WRPs. The location of the Phase I digesters was determined to be the most optimum site based on review of costs, safety, and environmental impacts of other sites at the JWPCP. The Districts must meet several criteria in considering the design, construction, and operation of the proposed Phase I digesters, including the need to:

- provide required capacity;
- allow continued operation of the existing facility during construction;
- provide for future expansion of the facility beyond the existing 2010 planning horizon;
- complete design and construction to enable operation of the full secondary treatment at the JWPCP by December 31, 2002 (as required by the Consent Decree);
- minimize nuisance impacts on the surrounding community;
- provide for efficient, long-term operation of the facility;
- minimize risks to employee health and safety; and
- minimize overall cost of the facility.

The site chosen by the Districts for the Phase I digesters best meets these criteria.

Adequate capacity is necessary to maintain solids detention times that are sufficient to ensure reliability and pathogen reduction. Seven digesters are needed to accommodate the increased generation of solids from full secondary treatment. These digesters will process the projected increase in solids flows through 2007. The possible locations for these digesters are restricted by the size of the required facility. The alternative locations at the JWPCP site considered for siting digesters include the following areas:

- Site 1: between Lomita Boulevard and the existing rectangular digesters north of Lomita Boulevard and west of Figueroa Street;

- Site 2: north of the existing chlorination and solids processing facilities south of Sepulveda Boulevard;

- Site 3: east of the proposed secondary treatment reactors and clarifiers, south of the AT-SF Railroad, east of Figueroa Street; and

- Site 4: south of Lomita Boulevard and west of Figueroa Street.

Site 1 has been reserved for construction of six Phase II digesters (see Figure 2-7 in the draft EIR). Of these six digesters, only two will provide additional capacity; the remaining four will replace the existing rectangular digesters, which perform less efficiently than circular digesters. In addition, construction of the Phase I digesters on Site 1 would require demolition of existing rectangular digesters. This would result in insufficient digester capacity during construction.

The distance of Site 2 from needed support facilities make locating Phase I digesters at this site cost-prohibitive. Digesters require steam for heating; locating the digesters at Site 2 would require either routing a major steam line across Figueroa Street or constructing a boiler house adjacent to the site.

Additionally, a flaring station located adjacent to the digesters, a gas pipeline from Site 2 across Figueroa Street, and additional or modified raw sludge pump stations would have to be constructed. Currently, the hazards associated with digester gas are confined to the primary treatment area of the JWPCP. Introducing these hazards to Site 2, which is near the existing chlorination facilities, would complicate safety procedures for workers in that area.

Site 3 also is too far from needed support facilities, including steam for digester heating. In addition, the alignment of sludge feed, sludge drawoff, and steam heat piping to this location would be highly constrained and cost-prohibitive. Additionally, this area has been reserved for future expansion of secondary treatment facilities.

Site 4 was considered unsuitable because of cost and aesthetic reasons. A portion of the property south of and fronting Lomita Boulevard is owned by Margate Construction, Inc. Locating the digesters at this site would require relocating the Margate Construction office and equipment yard or moving the digesters further south on the Districts' property. A gallery connecting the digesters south of Lomita Boulevard with the existing digester system would be at least 700 feet longer than that required for the proposed Phase I digester site, which would add several million dollars to the project cost. Additionally, the depth of the gallery and distance to supporting facilities gallery would make location of the digesters at this site too costly.

In addition to cost considerations, other reasons for not locating digesters at this site include access and land use issues. Constructing digesters at Site 4 would require Districts vehicles to cross Lomita Boulevard from the main plant site north of Lomita Boulevard for maintenance and operations. Furthermore, because the existing land uses at Site 4 include parkland; public buildings; active oil wells, pipelines, and oil leases; and open space, locating the digesters at this site would be inconsistent with the City of Los Angeles general plan land use designation as an open space/public/quasi-public area. Unlike the rest of the JWPCP site, this parcel of land is not designated for industrial use but rather functions as a buffer between the industrial uses of the JWPCP site and the adjacent community.

Because of the constraints of locating the Phase I digesters at Sites 1 through 4 listed above, the Districts did not consider these sites further. Because alternative sites are not considered feasible for reasons described above, the Districts chose the location identified in the draft EIR for the Phase I digesters and proposed mitigation measures that would reduce the impacts on the adjacent JWPCP marsh habitat and wildlife to less-than-significant levels. No change to the draft EIR is required.

15-2. The Districts' existing JOS WRPs provide tertiary treatment to all influent wastewater to produce reclaimed water. Treatment at the WRPs consists of the following unit processes: primary treatment via gravity settling, secondary treatment via conventional air activated sludge process, conventional tertiary treatment via filtration, and disinfection (see Figure 4.1-3 in the 2010 Plan). Reclaimed water produced at the inland WRPs is suitable for a large variety of reuse applications including groundwater recharge, industrial process water, and landscape irrigation.

The suitability of treated effluent for any given reuse application depends on two factors: the level of treatment provided and the quality or strength of the influent wastewater. The ability of the inland WRPs to produce high-quality reclaimed water that is suitable for a wide range of reuse applications is a direct result of the level of treatment provided and the Districts' ability to selectively route lower strength residential wastewater to the WRPs while routing higher strength industrial wastewater around the WRPs to the JWPCP for treatment. The strength of wastewater is reflected by the concentrations of total suspended solids (TSS), total dissolved solids (TDS), and chemical oxygen demand (COD) in the wastewater. Because high-strength industrial wastewaters are diverted to the JWPCP as described above, and because the JWPCP service area includes the largest concentration of industrial dischargers in Southern California, influent wastewater at the JWPCP is of very high strength, exhibiting high levels of TSS, TDS, and COD. The practice of returning sewage solids removed at the WRPs to the sewer system for conveyance to the JWPCP for treatment and processing also tends to increase the strength of influent wastewater at the JWPCP. The relative strength of influent wastewater at the WRPs and the JWPCP is shown in Table 3-3, page 3-17, of the draft EIR.

The quality and/or suitability of treated effluent (or reclaimed water) for reuse is largely a function of the level of TDS and other constituents in the reclaimed water. Conventional wastewater treatment processes such as those employed at the JOS WRPs effectively remove TSS and COD and effectively kill and/or remove bacteria and/or viruses in wastewater. However, they are not efficient in removing TDS. Tertiary treatment/filtration removes TSS but not TDS (dissolved solids are by definition less than one one-thousandth of 1 micron in diameter). Reclaimed water produced at the JWPCP via tertiary treatment would, therefore, have high TDS levels and would be of relatively low quality and suitable for only a very limited range of reuse applications. It could not, for example, be used for landscape irrigation because elevated TDS levels would kill many types of plants, nor could it be used for groundwater recharge as the Water Replenishment District of Southern California has set an upper limit of 700 milligrams per liter for TDS (tertiary effluent from the JWPCP would contain approximately 1,200-1,400 mg/l TDS), nor could it be used for many industrial processes that require high-quality water (low TDS and especially low hardness) to avoid problems such as boiler scale and corrosion. The suitability of such water for freshwater wetland enhancement may also be doubtful because of high TDS and ammonia concentrations.

15-3. Chapter 3 of the draft EIR, "Hydrology and Water Quality", states on page 3-2 that the water quality control plan most applicable to the Districts' facilities is the RWQCB Water Quality Control Plan for the Los Angeles Region (Basin Plan) and on page 3-3 references Appendix B of the draft EIR (which is bound together with the draft EIR) as having detailed relevant numeric surface water and groundwater quality objectives from the Basin Plan, as well as other objectives for surface waters and groundwater designated as municipal water supply. No change to the draft EIR is required.

15-4. Page 17-1 of the draft EIR states that it is acknowledged in the State CEQA Guidelines that for some projects the only feasible mitigation for cumulative impacts involves adopting ordinances or regulations rather than imposing project-specific conditions. Furthermore, page 17-5 of the draft EIR states that the Districts have little authority or ability to mitigate the significant adverse impacts associated with growth, other than the authority and responsibility to provide wastewater and solid waste services. The State CEQA Guidelines (Section 15091[2]) allow the Districts to find that mitigation for growth-related impacts is the responsibility of other public agencies that have adopted or should adopt such mitigation. In this case, the Districts propose the implementation of local and SCAG RCP policies and programs adopted by agencies with the authority to enforce the policies the agencies adopted. No change to the draft EIR is required.

15-5. The parcel of Districts-owned land on the southwest corner of Lomita Boulevard and Figueroa Street is designated open space/public/quasi-public by the City of Los Angeles. The Districts' short-term plans for this site are to reserve the area for possible construction staging and storage. Long-term plans are to maintain the site as open space buffer property. Also, see Comment 10-1 in Letter 10 of the final EIR for the City of Los Angeles' concurrence with the Districts' use.

15-6. The Districts recognize that the JWPCP marsh is a remnant of a once larger area of wetland and have reserved the marsh site. No change to the draft EIR is required.

15-7. See response to Comment 15-1.

15-8. The production of reclaimed water at the JWPCP was considered as a conceptual project alternative during the facility planning process and is discussed in Section 6.5.2, JWPCP Water Reclamation subsection, page 6-13, of the 2010 Plan. Changes have been made to this subsection (in lines 11 through 13 of the second paragraph on page 6-13) to reflect the estimated cost of producing reclaimed water at the JWPCP.

15-9. See response to Comment 15-1.

15-10. See response to Comment 15-2.

15-11a. Figure 12-2 in the draft EIR shows that the site proposed for Phase I digesters is designated as industrial. The proposed digesters will be between 12 and 15 feet above adjacent grade and approximately 125 feet in diameter and will be painted in shades of brown earth tones identical to the existing digesters. A 3-foot-high painted metal screen wall also will be placed on top of each digester (for a total height of 15-18 feet), which will shield piping and equipment on top of the digesters from the view of motorists on Figueroa Street. A wall will also be constructed between the proposed digesters and Figueroa Street. The Districts will plant trees along Figueroa Street to further shield the proposed facilities. No change to the draft EIR is required.

15-11b. The Districts have modified the design of the storm drains so that no discharge of stormflow into the JWPCP marsh will occur from around the Phase I digesters. Stormwater runoff from the proposed Phase I digester area will be collected through drainage catch basins and associated storm drains at a stormwater pump station to be located adjacent to the existing developed area south of the AT-SF railroad tracks. Collected stormwater will be diverted into the plant for treatment during the initial phase of a storm in compliance with the existing storm water pollution prevention plan (SWPPP) for the JWPCP. After a predetermined time, continued stormflow will be discharged directly to the Wilmington Drain from the pump station (as is currently practiced). As a result of this modification to the project design, Mitigation

Measure 11-1, "Install Energy Dissipaters in Drainages into the Marsh", is no longer needed and has been deleted from the draft EIR. See Chapter 3 of the final EIR, "Changes and Modifications to the Draft EIR".

15-12. See response to Comment 15-1. Also, the "upland area" adjacent to the JWPCP marsh is neither zoned nor maintained as open space. It is currently leased from the Districts for a commercial nursery for growing bedding plants. No change to the draft EIR is required.

15-13. As stated on page 3-33 of the draft EIR, the Districts are required under the Clean Water Act to obtain a general construction activity stormwater permit before construction, which requires preparation of an SWPPP. The SWPPP will be implemented in accordance with the requirements of the SWRCB General Permit Number CAS000002, which is administered by the Los Angeles RWQCB. All prevention measures and monitoring frequencies will be specified to be in compliance with RWQCB requirements. Development of an SWPPP is an ongoing process at the construction site.

Because of the nature of construction projects, the required mitigation measures will continually vary as the construction progresses. Development of an initial plan for each individual construction contract will be required, and the individual plans will be maintained in conjunction with the construction contractors involved in each project. As a standard practice, the Districts use the Construction Handbook of Best Management Practices (BMPs), which was developed in conjunction with the SWRCB to define the BMPs required for construction contractors. Contractor compliance and the development of the SWPPP are made standard provisions of the plans and specifications. No change to the draft EIR is required.

15-14. See response to Comment 15-11b.

15-15. In response to this comment, Mitigation Measure 11-2, "Prepare and Implement a Marshland Management Plan", is hereby revised to identify the specific elements of the plan. The expanded description of the plan emphasizes the importance of enhancing the wildlife value of the marsh, assigns responsibilities for review and implementation, and establishes timing for implementation. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR".

15-16. Page 12-19 of the draft EIR describes a significant impact related to the conversion of an open space zoning and significant ecological area designation at the Whittier Narrows WRP. However, open space would not be converted at the JWPCP (specifically, the area proposed for the Phase I digesters). Figure 12-2 of the draft EIR shows that the designated land use for the proposed Phase I digester site is industrial, not open space. Figure 12-3 of the draft EIR shows that the zoning designation for this site is heavy manufacturing. Furthermore, the existing site is not

used as open space or recreation, but rather for a commercial nursery. No change to the draft EIR is required.

15-17. The proposed Phase I digesters are relatively low structures (a maximum of 18 feet high), which are approximately the same height as the existing greenhouse structures. As part of Mitigation Measure 15-5, the Districts plan to screen the proposed Phase I digesters from the public view by using fencing and landscaping, which would include planting trees along the west side of Figueroa Street north of the AT-SF railroad. The current view of the site from Figueroa Street has no trees and would be improved by the proposed mitigation. No change to the draft EIR is required.

15-18. See responses to Comments 15-1 and 15-15.

15-19. See response to Comment 15-1.

15-20. See response to Comment 15-13.

15-21. See response to Comment 15-11b.

15-22. See response to Comment 15-15.

15-23. See response to Comment 15-16.

15-24. See response to Comment 15-17.

15-25. See response to Comment 15-2.

15-26. Page 2-3 of the draft EIR states that the objectives of the 2010 Plan are "to provide wastewater conveyance, . . . and reclamation/disposal facilities. . . .", not to increase the "beneficial reuses of reclaimed wastewater". No change to the draft EIR is required.

15-27. The JOS service area has access to reclaimed water from JOS water reclamation facilities as well as from other water reclamation facilities. The foundation of the regional water reclamation and reuse strategy is the construction and operation of reclaimed water distribution systems that convey reclaimed water from its point of origin to users within the area that the system serves. These distribution systems are generally constructed, owned, operated, and maintained by water supply agencies. A number of reclaimed water distribution systems currently serve or will soon serve much of the JWPCP service area. These include (but are not limited to) the following systems: City of Long Beach, City of Cerritos, City of Lakewood, City of Bellflower, Central Basin Municipal Water Districts' Century Project, and West Basin Municipal Water Districts' Water Recycling Program. Reclaimed water for enhancement of habitat at Harbor Lake and/or Bixby Slough could be acquired from

one or more of these distribution systems. In addition, reclaimed water produced at the San Jose Creek and Whittier Narrows WRPs is used to recharge the Central Basin Aquifer. Much of this water is later withdrawn and used within the JWPCP service area. No change to the draft EIR is required.

15-28. To produce reclaimed water at the JWPCP that is suitable for reuse, TDS levels in the secondary effluent must be significantly lowered via an advanced treatment process. The conventional tertiary treatment process employed at the inland WRPs would have to be supplemented by a reverse osmosis process to remove dissolved solids from tertiary effluent. JWPCP effluent also exhibits relatively high concentrations of ammonia, which could preclude some types of reuse applications.

The preferred method to remove ammonia from JWPCP effluent would require nitrification and denitrification facilities consisting of conventional air-activated sludge facilities operated to achieve nitrification and denitrifying filters consisting of attached-growth biological columns. Unit treatment processes required to produce usable reclaimed water at the JWPCP would include: preliminary treatment, advanced primary treatment, secondary treatment via a pure-oxygen activated sludge process, nitrification via conventional air activated sludge facilities, denitrification via denitrifying filters, demineralization via reverse osmosis, and disinfection. The following additional facilities would have to be constructed at the JWPCP: conventional air activated sludge facilities operated to achieve nitrification, clarifiers, denitrifying filters, and reverse osmosis facilities.

Capital and operation and maintenance costs for facilities necessary to produce reclaimed water at the JWPCP are given in the table below.

Table 2-3. Cost of Reclaimed Water Production at the JWPCP

Facility	Capital Cost ($ million)	Annual Operation and Maintenance Cost ($ million/yr)	Equivalent Annual Cost[a] ($ million/yr)
Nitrification system	5.78	0.24	0.83
Final clarifier system	2.0	0.12	0.32
Denitrification system	2.30	0.42	0.65
Reverse osmosis facilities	35.39	2.03	5.64
TOTAL	45.47	2.81	**7.44**

[a] Assumes 20-year amortization of capital costs at 8% interest rate.

Based on the above figures, the capital cost of additional facilities necessary to produce 8 mgd or approximately 24.5 AF/day of reclaimed water at the JWPCP would be approximately $45.5 million. Annual operation and maintenance costs for these facilities would be approximately $2.8 million. The equivalent annual cost for these facilities is approximately $7.4 million, and the unit cost of reclaimed water produced at the JWPCP would be approximately $830/AF.

To reuse reclaimed water produced at the JWPCP, distribution facilities consisting of pipelines and pumping stations would also have to be constructed in order to deliver reclaimed water to users. The capital cost of distribution pipelines alone ranges from approximately $30 to $200 per linear foot and operation costs for such facilities vary directly with pipeline length and required pumping lift. Capital and operation and maintenance costs for necessary distribution facilities would further increase the cost of reclaimed water.

Simple alterations of the proposed size of water reclamation facilities at the JWPCP would not significantly alter the cost to produce and deliver reclaimed water. It would be more costly to produce and deliver smaller quantities of reclaimed water because certain fixed capital costs for production and distribution facilities would have to be repaid by a smaller number of users and because larger facilities operate more efficiently due to economies of scale. On the other hand, while unit costs of reclaimed water would be slightly lower for a larger facility, absolute costs would be larger and unused reclaimed water, which is produced at a high cost, would have to be disposed of to the Pacific Ocean through the existing ocean outfalls in accordance with the Districts' National Pollutant Discharge Elimination System (NPDES) permit for operation of the JWPCP.

The Districts typically do not sell reclaimed water produced in the JOS directly to reclaimed water users. Rather, the Districts sell reclaimed water produced at the JOS WRPs to water purveyors and/or other agencies who supply water either directly or indirectly to water consumers. The Districts currently employ a flexible pricing scheme for sale of reclaimed water. Reclaimed water produced at JOS WRPs is generally sold at the higher of either one-half of the savings that the buyer realizes by using reclaimed water (calculated by subtracting capital and operation and maintenance costs for distribution facilities from the price of the alternative water supply) or one-fifth of the Districts' operation and maintenance costs to produce reclaimed water at the inland WRPs.

The pricing scheme described above would not, however, be applicable for reclaimed water produced at the JWPCP via the advanced treatment process previously described. At the inland WRPs this pricing scheme allows the Districts to recoup a portion of the costs to operate and maintain wastewater treatment facilities that are mandated by existing water quality laws and associated receiving water standards. Thus, reuse of reclaimed water provides a dual benefit of providing a low-cost source

of water and reducing what may be regarded as operation and maintenance costs for the inland WRPs. In addition, the ability of the Districts to produce and provide high-quality reclaimed water at the inland WRPs is largely a function of the Districts' ability to isolate the WRPs from the industrial wastewater discharges that are routed to the JWPCP for treatment.

According to the Consent Decree, the Districts must provide secondary treatment to all wastewater treated at the JWPCP. As described previously, significant additional treatment processes would be required to produce marketable reclaimed water at the JWPCP involving significant additional cost (capital and operation and maintenance costs) that would be paid by all users of the JOS. If the pricing scheme used for reclaimed water produced at the JOS WRPs were adopted for reclaimed water produced at the JWPCP, this water would be sold at a cost significantly below its production cost. Because these costs may not be regarded as sunk costs (advanced treatment has not been mandated at the JWPCP), the sale of reclaimed water produced at the JWPCP at a price less than the additional cost required to produce it would, in effect, directly subsidize those who purchase and use this water. The Districts would, therefore, need to price reclaimed water produced at the JWPCP so as to recover the additional cost required to produce it.

Based on the costs given in Table 2-3, the price of reclaimed water produced at the JWPCP would be approximately $830/AF. By comparison, the cost of reclaimed water provided by the West Basin Municipal Water District's (WBMWD) reclaimed water distribution system, which will serve the area around the JWPCP, ranges between $200 and $250/AF and the Metropolitan Water District (MWD) sells untreated and treated potable water for $335/AF and $412/AF respectively. Based on the availability of substitutes for reclaimed water produced at the JWPCP at much lower prices, it is reasonable to assume that, given its required price, the demand for reclaimed water produced at the JWPCP would be almost nonexistent.

No change to 2010 Plan is required.

15-29. See response to Comment 15-3.

15-30. See response to Comment 15-4.

15-31. The referenced parcel of Districts' property is not considered "vacant land". Page 12-5 of the draft EIR indicates that the designated land use is open space/public/quasi-public. Also, see response to Comment 15-5 for a description of the Districts' plans for this parcel of land. No change to the draft EIR is required.

15-32. Table ES-1 of the draft EIR identifies the existing and proposed capacities of the JOS wastewater treatment plants, and Chapter 2 of the draft EIR, "Plan Description and Alternatives", identifies the high- and low-reuse scenarios for the inland WRPs under each of the 2010 Plan Alternatives. No change to the draft EIR is required.

10 years
Heal the Bay

Letter 16

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January 17, 1995

Mr. Charles Carry
Chief Engineer and General Manager
County Sanitation Districts of Los Angeles County
1955 Workman Mill Road
Whittier, CA 90601-1400
Attention: Mr. Gary Yoshida

Dear Mr. Carry,

The following comments on the draft Joint Outfall System (JOS) 2010 Master Facilities Plan and the draft Program EIR for that plan were prepared on behalf of Heal the Bay, a local environmental group with over 10,000 members dedicated to making Santa Monica Bay and Southern California's coastal waters safe and healthy again for people and marine life. In addition, Heal the Bay is a signatory to the 1994 Consent Decree requiring full secondary treatment for all flows from the Joint Water Pollution Control Plant (JWPCP).

The primary concerns with any Masters Facilities Plan (MFP) and Programmatic EIR are the alternatives analysis and the subsequent conclusion based on the analysis: a preferred alternative. The MFP was quite thorough in the analysis of a wide array of alternatives for the JOS. The screening criteria for eliminating possible alternatives were clearly stated and they were applied consistently across all alternatives. However, Heal the Bay has a number of questions about the preferred alternative and the third and fourth alternative.

#1 - Does the final preferred alternative include a reclaimed water pumpback facility for Los Coyotes WRP? Los Coyotes has little potential for water reuse within areas tributary to the facility. As you know, water reuse is one of our organization's highest priorities (as demonstrated by our support of water reuse and groundwater recharge projects throughout the region) and we know that the Districts have been a leader in this field for 30 years. The MFP states that a pumpback facility is needed at Los Coyotes in order to meet the demands characterized in the Regional Wastewater Reclamation and Reuse Operation and Coordination Study (6-104). However, we could not find another section in the MFP or d-EIR that stated that the Districts plan to build the facility as part of the Los Coyotes expansion. **16-1**

#3 - If the pumpback facility does not get built at Los Coyotes, this alternative is environmentally superior to the first alternative because of the increased potential for water reuse. Did you determine that Alternative 1 was superior to #3 because of lower cost, higher peak storm capacity, and the potential of flooding at Whittier Narrows? Does Whittier Narrows expansion pose an additional operations problem other than flood risk? If not, in light of the storm patterns over the last three years, Los Angeles' Tillman WRF has provided a great deal of information on protecting facilities within flood control basins. Three years ago, without much flood control protection in place, inundation led to a record 65 million gallon spill. Since then, the City has demonstrated that it is feasible and reasonably cost effective to expand an upstream WRF and provide mitigation for loss of facility flood control capacity. **16-2**

#4 - For Heal the Bay's concerns, this is probably the environmentally superior alternative because implementation of the alternative would result in decreased ocean discharge and increased production of reclaimed water. Was the alternative inferior to #1 because of increased cost alone? Alternative 4 scored quite high in all categories except for cost, design construction and scheduling (related to cost and limited staff resources), and system operation (the same Whittier Narrows problem). **16-3**

As the Districts learned first hand in the early eighties, SCAG population projections have been known to be inaccurate. Is the Districts' projected capacity need of at least 628 MGD an absolute requirement for the 2010 JOS plan? Is an alternative of 350 MGD at JWPCP, 125 MGD at San Jose Creek, 50 MGD at Los Coyotes, and 52.5 MGD at Whittier Narrow (plus existing capacity at Pomona and Long Beach) completely out of the question as a viable alternative (615.5)? **16-4**

Biosolids - Heal the Bay's remaining comments are predominantly limited to the category of Biosolids management. Heal the Bay and the Districts have long disagreed about the definition of biosolid beneficial reuse. We have used the EPA definition which includes land application, composting, chemical stabilization, and energy recovery while the Districts have added landfill disposal as a beneficial use. Regardless of our differences, there is no disagreement over the fact that the Districts will be producing significantly more biosolids after full secondary at the JWPCP goes on-line.

Considering the fact that the Districts spent tens of millions of dollars on a biosolids energy recovery system, why wasn't energy recovery included as a biosolids management option? The Carver-Greenfield sludge drying process has proved unreliable and cost-ineffective, but sludge drying through ultra-efficient centrifugation has shown a great deal of promise. Considering that the Districts is already planning to upgrade their dewatering processes over the next ten years, does this mean that energy recovery will be considered a more viable option at that point? **16-5**

At one point over the last few years, the Districts had expressed interest in an in-vessel compost system. Does the Districts still consider this sort of system as a viable biosolids management option? Did the in-vessel compost experience at the Las Virgenes Municipal Water District provide information that led the Districts to eliminate this option? **16-6**

As we've all seen over the last six months, even the best biosolids management programs on paper can turn into Quality Control problems (the sludge mountain on Native American Reservation land). What additional precautions will the Districts take to ensure that **16-7**

contractor biosolids management programs will meet the same high standards of the rest of the Districts' operations? If those standards are not met, what will the Districts do to mitigate the actions of the irresponsible contractor? | 16-7

Miscellaneous d-EIR comments - On page 5-33 - the d-EIR states that the LA-2 dredge spoil dumpsite is 1.5 miles from the Palos Verdes peninsula. We were under the impression that the dumpsite was *approximately 5 miles SW of the peninsula*. | 16-8

In relation to estimates of pollutant loadings from each of the four alternatives, what assumptions were used for pollutant removal efficiencies to derive the estimates in Tables 5-2 and 5-3? Were they based on the historic removal efficiencies for those constituents at those facilities? | 16-9

Chapter 5 did not adequately assess the possible benefits to marine life of going to full secondary treatment at the JWPCP. This seemed inconsistent with the analysis in the rest of the document (for example - the risk of human illness and degradation to groundwater supplies of water reuse was discussed throughout the document, yet where are the data to substantiate such a statement). However, there have been numerous studies that have demonstrated improvements in marine biological communities following significant reductions in loadings of suspended solids and BOD or TOC. | 16-10

The No Project alternative did not have a negative impact to marine life. This is contrary to *the conclusions reached by the EPA in their assessment* of the Districts last 301(h) waiver application. Heal the Bay believes that the No Project alternative would result in an unavoidable significant impact to marine life. | 16-11

Conclusions - Heal the Bay agreed with the Districts conclusions that the four favored alternatives posed no significant, unmitigatable impacts to water quality and natural resources. Also, although we disagree on the merits of full secondary treatment, we support the Districts' basic proposal for completion of the full secondary facilities at the JWPCP and expansion of their upstream water reclamation facilities. Heal the Bay appreciated the opportunity to participate in the preliminary scoping meeting for the MFP and EIR. Congratulations for completing the necessary draft-planning and environmental review documents in a timely manner. *If you have any questions about our comments, please give* me a call at (310)394-3552 x119.

Sincerely,

Mark Gold

Mark Gold, D.Env.
Executive Director

16-1. The Districts would have a limited role in the construction of the pumpback facility, which was identified for the Los Coyotes WRP in the 2010 Plan alternatives. The Central Basin Municipal Water District most likely would be the lead agency for implementing this facility. To some degree, the ability to pump reclaimed water from the Los Coyotes WRP to the north already exists. The City of Cerritos owns an existing pump station at the Los Coyotes WRP that provides reclaimed water to its customers and to the Central Basin Municipal Water District for the Century project. The Central Basin Municipal Water District also operates its own pump station, which supplies effluent from the San Jose Creek WRP to the Rio Hondo project. Because the Rio Hondo and Century project systems are interconnected, it is possible to provide reclaimed water from either WRP to both systems. As the demand for the two systems increases, the capacity of the existing pump station at the Los Coyotes WRP would have to be increased to meet the flow requirements identified in the 2010 Plan. No change to the draft EIR is required.

16-2. Alternative 1 was chosen over Alternative 3 by the Districts based on a combination of considerations, including cost, design and operational constraints, and environmental impacts. Of the four alternatives analyzed in detail, Alternative 3 is the second most costly. Also, as described on page 1-3 of the draft EIR, the Districts considered the impacts on 14 different resource areas. Of those 14 areas, the potential for increased availability of reclaimed water for reuse was a beneficial impact identified for hydrology and water quality and public services and facilities. It was not the Districts' intent to base the determination of the environmentally superior alternative solely on the amount of reclaimed water made available for reuse.

The draft EIR identifies flooding and flood storage capacity loss as significant impacts associated with the Whittier Narrows WRP under Alternative 3. Other significant impacts addressed in the draft EIR that would occur only at the Whittier Narrows WRP pertain to geologic and soil hazards, botanical and wildlife resources, land use, and cultural resources.

Page 11-21 of the draft EIR identified the loss of riparian scrub habitat from construction at the Whittier Narrows WRP under Alternative 3, which is an issue of major concern to the USFWS because of the possible effects on the least Bell's vireo, a state- and federally listed endangered species (see Comment Letter 1). Under Alternative 1, special-status species would not be affected. Page 3-38 of the draft EIR states that the Districts are working with the U.S. Army Corps of Engineers to identify regulatory requirements and design measures that would avoid inundation at the proposed facility, and Mitigation Measure 3-2 in the draft EIR

proposes to replace the approximate 230,000 cubic yards of lost flood storage capacity. No change to the draft EIR is required.

16-3. Similar to Alternative 3, Alternative 4 was not chosen as the recommended alternative for several reasons. Alternative 4 is the most costly; would involve modifications to the Los Coyotes, San Jose Creek, and Whittier Narrows WRPs; and would cause more significant impacts than any of the other alternatives. No change to the draft EIR is required.

16-4. Population projections are by their nature less than exact. SCAG population projections generated during the late 1970s and 1980s, for example, substantially underestimated the actual rate of population growth experienced in Southern California during the last two decades. Despite the inherent uncertainty associated with projection modeling, it is a necessary tool in estimating future needs for housing, employment, infrastructure, and services. The Districts base their wastewater flow projections on population projections.

Because the Districts are pursuing federal financial assistance (direct grants and/or State Revolving Fund loans) for the upgrade portion of this project and for future inland WRP expansions, the 2010 Plan must conform to SCAG's population projections. Section 176(c)(1)(B)(iii) of the federal Clean Air Act requires conformity with an implementation plan when federal support or financial assistance is granted by a department or agency of the federal government. The Section states that "The determination of conformity shall be based on the most recent estimates of emissions, and such estimates shall be determined from the most recent population, employment, travel, and congestion estimates as determined by the metropolitan planning organization . . .", which in this case is SCAG.

Because past population projections have been inaccurate, the Districts will monitor the actual needs for wastewater services, as stated in the draft project report. If flows develop more quickly than the flow projections indicate, implementation of the inland WRP expansions would be accelerated. On the other hand, if wastewater flows develop more slowly than the proposed flow projections indicate, implementation of the proposed inland WRP expansions would be delayed.

The suggested alternative of 350 mgd at the JWPCP, 125 mgd at the San Jose Creek WRP, 50 mgd at the Los Coyotes WRP, and 52.5 mgd at Whittier Narrows WRP would not be a feasible alternative because:

- it would not conform with Section 176(c) of the Clean Air Act;
- there is no basis for the Districts to assume the SCAG population projections are inaccurate; and

- it would have the same disadvantages as Alternative 4, which is analyzed in the 2010 Plan and draft EIR.

No change to the draft EIR is required.

16-5. The Carver-Greenfield dehydration system followed by fluidized bed combustion with energy recovery was built under the innovative/alternative technology portion of the Clean Water Act Grant Program to treat approximately 50% of the JWPCP solids. The Districts declared the system a failed technology as defined by the federal grant program regulations.

As described on page 6-42 of the draft 2010 Plan, dewatering of biosolids using the most advanced centrifuge technology is under consideration. Dewatering using the most current, cost-effective centrifuge technology would be expected to achieve 29-31% total solids (i.e., 69-71% moisture content). Combustion with energy recovery requires a much higher total solids content to support combustion without auxiliary fuel. An intermediate step, "drying", must be provided by equipment such as multiple-effect evaporation, indirect steam dryers, or direct dryers. These drying processes can produce a biosolids fuel at 85-95% total solids. Indirect steam dryers have been operated at the City of Los Angeles' Hyperion plant and were also tested at the JWPCP. Drying and energy recovery was determined to be high in cost, energy demand, and maintenance. Improvements to centrifuge technology will not produce a sludge cake by centrifugation alone that is sufficiently dry for energy recovery. No change to the draft EIR is required.

16-6. The Districts constructed an in-vessel composter demonstration pilot plant at JWPCP with a capacity of about 10 wet tons per day and have conducted research on the process since July 1992. Representatives of the Districts have visited the Las Virgenes Municipal Water District site; however, the process has been evaluated based mainly on extensive research conducted at the Districts' demonstration facility. Based on this research, the cost of in-vessel composting currently appears to be at least twice that of offsite windrow composting and other reuse options. In addition, the process creates substantial energy demands. In-vessel composting is therefore not considered a feasible option at this time.

In the future, the Districts will continue to refine and reassess the feasibility of in-vessel composting. For example, Districts staff have developed and patented an air management/odor control system, which demonstrated that a pilot plant such as the one at JWPCP can be operated with no net increase in emissions. No change to the draft EIR is required.

16-7. Page 2-37 of the draft EIR identifies the Districts' quality control measures for biosolids contract management. A key element of the quality control effort is the inspection program. The Districts have conducted site inspections in the past and are continually assessing their program so that a more thorough and standardized inspection protocol will always be in place. The inspection program will be aimed at detecting problems before they become a concern.

For example, one objective will be to more readily inventory a site to ensure that only reasonable amounts are being stored. Site conditions can be enforced because Districts' contracts contain provisions to allow cessation of hauling to a site if conditions are found unacceptable. By maintaining multiple contracts with flexible capacity as well as the Districts-operated landfill as a back-up site, the Districts can avoid the need to rely on any single contractor and can require strict compliance with contract and permit conditions. No change to the draft EIR is required.

16-8. The draft EIR is hereby changed to state that the dredge spoil site is approximately 1.5 miles in diameter and is located between 4.5 and 6.0 miles southeast of the Palos Verdes Peninsula. See Chapter 3 of the final EIR, "Changes and Errata to the Draft EIR".

16-9. The projected concentrations of and mass emissions in the JWPCP discharge for 2010 are based on the following assumptions: the JWPCP will run at full capacity in 2010, the influent concentrations for the contaminants identified will be similar to the levels that were received by the JWPCP in 1993, and the effluent concentrations for the contaminants identified will be similar to the concentrations measured in the secondary effluent in 1993. No change to the draft EIR is required.

16-10. Pages 5-40 through 5-43 discuss the potential for improved conditions for marine biota resulting from disposal of secondary-level treated effluent. Specifically, the proposed project's effects on plankton; kelp beds; benthic invertebrates; demersal fish; pelagic fish; coastal and pelagic birds; marine mammals; rare, threatened, and endangered species; and beneficial uses are discussed. No change to the draft EIR is required.

16-11. Page 5-44 of the draft EIR states that the concentrations and mass emissions projected for 2010 under the No-Project Alternative would meet marine water quality, current NPDES standards, and the California Ocean Plan limitations. These results support the Districts' conclusion that the No-Project Alternative would have a less-than-significant impact on marine life. No change to the draft EIR is required.

Letter 17

Surfrider Foundation

Sanitation Districts of
Los Angeles County
1955 Workman Mill Road
Whittier, CA 90621

January 18, 1995

Dear Sirs/Madams,

Thank you for the opportunity to comment on the draft environmental impact report (d.e.i.r.) for the Joint Outfall System 2010 Master Facilities Plan. The d.e.i.r. seems to have adequately outlined the various impacts of this project. We have no problem with the chosen alternative.

An increase in water recycling and an upgrade of water treatment will greatly benefit our environment. 17-1

Thank You,

Gordon LaBedz, M.D.

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Response to Comments from the Surfrider Foundation

17-1. Support for the draft EIR is hereby noted.