

GROUNDWATER BASINS MASTER PLAN

Final Program Environmental Impact Report

Prepared for
Water Replenishment District
of Southern California

September 2016



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626 Wilshire Boulevard
Suite 1100
Los Angeles, CA 90017
213.599.4300
www.esassoc.com

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Groundwater Basins Master Plan Final PEIR

*NOTE: Chapters 1 through 8 can be found in the Groundwater Basins Master Plan
Draft Program Environmental Impact Report published December 2015*

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CHAPTER 9

Introduction to Response to Comments

This Final Program Environmental Impact Report (Final PEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and *CEQA Guidelines* (California Administrative Code Section 15000 et seq.). The Final PEIR incorporates, by reference, the Draft PEIR (State Clearinghouse No. 2012091035) prepared by the Water Replenishment District of Southern California (WRD) for the Groundwater Basins Master Plan (proposed project), as it was originally published and the following chapters, which include revisions made to the Draft PEIR.

9.1 CEQA Requirements

Before WRD may approve the project, it must certify that the Final PEIR: a) has been completed in compliance with CEQA; b) was presented to the WRD Board of Directors who reviewed and considered it prior to approving the project; and c) reflects WRD's independent judgment and analysis.

CEQA Guidelines Section 15132 specifies that the Final PEIR shall consist of the following:

- The Draft PEIR or a revision of that draft;
- Comments and recommendations received on the Draft PEIR;
- A list of persons, organizations, and public agencies commenting on the Draft PEIR;
- The response of the Lead Agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the Lead Agency.

This Final PEIR for the Groundwater Basins Master Plan presents the following chapters as a continuation of those included in the Draft EIR:

- Chapter 9: Introduction and CEQA process
- Chapter 10: A list of persons, organizations, and public agencies commenting on the Draft PEIR, and the written comments received on the Draft PEIR
- Chapter 11: Written responses to each comment identified in Chapter 10
- Chapter 12: Revisions made to the Draft PEIR in response to comments received or initiated by the Lead Agency
- Chapter 13: Mitigation Monitoring and Reporting Program

9.2 CEQA Process

Public Participation Process

Notice of Preparation and Public Scoping

In accordance with Section 15082 of the *CEQA Guidelines*, a Notice of Preparation (NOP) of a PEIR was prepared and circulated for review by applicable local, state and federal agencies and the public. The 30-day project scoping period, which began with the distribution of the NOP, remained open through October 15, 2012. One public scoping meeting was held on September 27, 2012 at the WRD office. The NOP provided the public and interested public agencies with the opportunity to review the proposed project and to provide comments or concerns on the scope and content of the environmental review document including: the range of actions; alternatives; mitigation measures, and significant effects to be analyzed in depth in the PEIR.

Notice of Availability of the Draft EIR

The Notice of Availability (NOA) of the Draft PEIR was posted on December 17, 2015 with the County Clerk in Los Angeles County. The Draft PEIR was circulated to federal, state, and local agencies and interested parties requesting a copy of the Draft PEIR. Copies of the Draft PEIR were made available to the public at the following locations:

- Water Replenishment District of Southern California Web Site (<http://www.wrd.org/>)
- WRD Headquarters, 4040 Paramount Drive, Lakewood, CA 90712
- Pico Rivera Branch of Los Angeles County Public Library, 9001 Mines Avenue, Pico Rivera, CA 90660
- Clifton M. Brakensiek Library, 9945 Flower St, Bellflower, CA 90706
- Exposition Park - Dr. Mary McLeod Bethune Regional Library, 3900 S Western Ave, Los Angeles, CA 90062
- North Torrance Library, 3604 Artesia Blvd, Torrance, CA 90504

The Draft PEIR was circulated for public review from December 17, 2015 through February 15, 2016. WRD established a 60-day review period that exceeds the typical 45-day requirement of Section 21091 of the Public Resources Code. During this period, WRD held one public meeting to provide interested persons with an opportunity to comment orally or in writing on the Draft PEIR and the project. The public meeting was held at the WRD office in Lakewood on January 28, 2016.

Evaluation and Response to Comments

CEQA Guidelines Section 15088 requires WRD, as the Lead Agency, to evaluate comments on environmental issues received from parties that have reviewed the Draft PEIR and to prepare a

written response. The written responses to commenting public agencies shall be provided at least ten (10) days prior to the certification of the Draft PEIR (*CEQA Guidelines* §15088(b)).

Final EIR Certification and Approval

As the Lead Agency, WRD has the option to make the Final PEIR available for public review prior to considering the project for approval (*CEQA Guidelines* §15089(b)). Prior to considering the project for approval, WRD, as the Lead Agency, will review and consider the information presented in the Final PEIR and will certify that the Final PEIR:

- (a) Has been completed in compliance with CEQA;
- (b) Has been presented to the Board of Directors as the decision-making body for the Lead Agency, which reviewed and considered it prior to approving the project; and
- (c) Reflects WRD's independent judgment and analysis.

Once the Final PEIR is certified, WRD's Board of Directors may proceed to consider project approval (*CEQA Guidelines* §15090). Prior to approving the proposed project, WRD must make written findings and adopt statements of overriding considerations for each unmitigated significant environmental effect identified in the Final PEIR in accordance with Sections 15091 and 15093 of the *CEQA Guidelines*.

Notice of Determination

Pursuant to Section 15094 of the *CEQA Guidelines*, WRD will file a Notice of Determination (NOD) with the Office of Planning and Research and Los Angeles County Clerk within five working days of project approval.

CHAPTER 10

Comment Letters

The Draft Program Environmental Impact Report (PEIR) for the Groundwater Basins Master Plan (proposed project) was circulated for public review for 60 days (December 17, 2015 through February 15, 2016) in accordance with the requirements of *CEQA Guidelines* Section 15105(a). The Water Replenishment District of Southern California (WRD) received seven comment letters during the public review period, which are listed in **Table 10-1** and included within this chapter. The letters have been marked with brackets that delineate comments pertaining to environmental issues and the information and analysis contained in the Draft PEIR. Responses to such comments are provided in Chapter 11.

**TABLE 10-1
COMMENT LETTERS RECEIVED**

Comment No.	Commenting Agency	Date of Comment
1	County of Los Angeles, Fire Department	January 20, 2016
2	State Water Resources Control Board	January 29, 2016
3	City of South Gate	February 11, 2016
4	California Department of Fish & Wildlife	February 12, 2016
5	County Sanitation Districts of Los Angeles County	February 12, 2016
6	California Department of Transportation	February 12, 2016
7	Los Angeles County Department of Public Works	February 25, 2016



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

January 20, 2016

Jason Weeks, Project Manager
Water Replenishment District
Southern California
4040 Paramount Boulevard
Lakewood, CA 90712

Dear Mr. Weeks:

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT,
"GROUNDWATER BASINS MASTER PLAN", IDENTIFIES AND EVALUATES
SPECIFIC PROJECTS AND MANAGEMENT STRATEGIES THAT WOULD
INCREASE REPLENISHMENT AND BENEFICIAL USE OF RECYCLED WATER AND
CAPTURED STORM WATER, LOS ANGELES (FFER 201600001)

The Notice of Availability of a Draft Environmental Impact Report has been reviewed by
the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous
Materials Division of the County of Los Angeles Fire Department. The following are
their comments:

PLANNING DIVISION:

- 1. We have no comments at this time.

LACFD-1

LAND DEVELOPMENT UNIT:

- 1. The development of this project must comply with all applicable code and
ordinance requirements for construction, access, water mains, fire flows, and fire
hydrants.

LACFD-2

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- AGOURA HILLS, ARTESIA, AZUSA, BALDWIN PARK, BELL, BELL GARDENS, BELLFLOWER, BRADBURY, CALABASAS, CARSON, CERRITOS, CLAREMONT, COMMERCE, COVINA, CUDAHY, DIAMOND BAR, DUARTE, EL MONTE, GARDENA, GLENDORA, HAWAIIAN GARDENS, HAWTHORNE, HIDDEN HILLS, HUNTINGTON PARK, INDUSTRY, INGLEWOOD, IRWINDALE, LA CANADA FLINTRIDGE, LA HABRA, LA MIRADA, LA PUENTE, LAKEWOOD, LANCASTER, LAWNSDALE, LOMITA, LYNWOOD, MALIBU, MAYWOOD, NORWALK, PALMDALE, PALOS VERDES ESTATES, PARAMOUNT, PICO RIVERA, POMONA, RANCHO PALOS VERDES, ROLLING HILLS, ROLLING HILLS ESTATES, ROSEMEAD, SAN DIMAS, SANTA CLARITA, SIGNAL HILL, SOUTH EL MONTE, SOUTH GATE, TEMPLE CITY, WALNUT, WEST HOLLYWOOD, WESTLAKE VILLAGE, WHITTIER

Jason Weeks, Project Manager
January 20, 2016
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2. Disruptions to water service shall be coordinated with the County of Los Angeles Fire Department and alternate water sources shall be provided for fire protection during such disruptions.

LACFD-3

3. Provide three sets of alternate route (detour) plans with a tentative schedule of planned closures prior to the beginning of construction. Complete architectural/structural plans are not necessary.

LACFD-4

4. This project does not propose construction of structures or any other improvements at this time. Therefore, until actual construction is proposed the project will not have a significant impact to the Fire Department's Land Development Unit.

LACFD-5

5. The statutory responsibilities of the County of Los Angeles Fire Department's Land Development Unit are to review and comment on all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for firefighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within contract cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities located within non-contract cities. The County of Los Angeles Fire Department's Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

LACFD-6

6. Future Construction activities associated with all projects proposed under Concepts A and B shall comply with all applicable codes and regulations.

LACFD-7

7. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department's Land Development Unit's Inspector Nancy Rodeheffer at (323) 890-4243.

8. The County of Los Angeles Fire Department's Land Development Unit appreciates the opportunity to comment on this project.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard

LACFD-8

Jason Weeks, Project Manager
January 20, 2016
Page 3

Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.

- 2. The Forestry Division will evaluate each proposed project during the approval process at which time we will identify any potential impacts and recommend mitigation if necessary.

↑
LACFD-8


HEALTH HAZARDOUS MATERIALS DIVISION:

- 1. The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department has no comment regarding the project at this time.

↑
LACFD-9

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



KEVIN T. JOHNSON, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

KTJ:ad



State Water Resources Control Board

JAN 29 2016

Jason Weeks
Water Replenishment District of Southern California
4040 Paramount Drive
Los Angeles, CA 90712

Dear Mr. Weeks:

ENVIRONMENTAL IMPACT REPORT (EIR) FOR WATER REPLENISHMENT DISTRICT OF SOUTHERN CALIFORNIA (DISTRICT) GROUND WATER BASINS MASTER PLAN (PROJECT); LOS ANGELES; STATE CLEARINGHOUSE NO.2012091035

We understand that the District may be pursuing Clean Water State Revolving Fund (CWSRF) financing for this Project. As a funding agency and a state agency with jurisdiction by law to preserve, enhance, and restore the quality of California's water resources, the State Water Resources Control Board (State Water Board) is providing the following information and comments for the environmental document prepared for the Project.

The State Water Board, Division of Financial Assistance, is responsible for administering the CWSRF Program. The primary purpose for the CWSRF Program is to implement the Clean Water Act and various state laws by providing financial assistance for wastewater treatment facilities necessary to prevent water pollution, recycle water, correct nonpoint source and storm drainage pollution problems, provide for estuary enhancement, and thereby protect and promote health, safety and welfare of the inhabitants of the state. The CWSRF Program provides low-interest funding equal to one-half of the most recent State General Obligation Bond Rates with a 30-year term. Applications are accepted and processed continuously. Please refer to the State Water Board's CWSRF website at: www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/index.shtml.

The CWSRF Program is partially funded by the United States Environmental Protection Agency and requires additional "CEQA-Plus" environmental documentation and review. Three enclosures are included that further explain the CWSRF Program environmental review process and the additional federal requirements. For the complete environmental application package please visit: http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml. The State Water Board is required to consult directly with agencies responsible for implementing federal environmental laws and regulations. Any environmental issues raised by federal agencies or their representatives will need to be resolved prior to State Water Board approval of a CWSRF financing commitment for the proposed Project. For further information on the CWSRF Program, please contact Mr. Ahmad Kashkoli, at (916) 341-5855.

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 | www.waterboards.ca.gov



It is important to note that prior to a CWSRF financing commitment, projects are subject to provisions of the Federal Endangered Species Act (ESA), and must obtain Section 7 clearance from the United States Department of the Interior, Fish and Wildlife Service (USFWS), and/or the United States Department of Commerce National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS) for any potential effects to special status species.

SWRCB-1

Please be advised that the State Water Board will consult with the USFWS, and/or the NMFS regarding all federal special-status species that the Project has the potential to impact if the Project is to be financed by the CWSRF Program. The District will need to identify whether the Project will involve any direct effects from construction activities, or indirect effects such as growth inducement, that may affect federally listed threatened, endangered, or candidate species that are known, or have a potential to occur in the Project site, in the surrounding areas, or in the service area, and to identify applicable conservation measures to reduce such effects.

SWRCB-2

In addition, CWSRF projects must comply with federal laws pertaining to cultural resources, specifically Section 106 of the National Historic Preservation Act (Section 106). The State Water Board has responsibility for ensuring compliance with Section 106 and the State Water Board must consult directly with the California State Historic Preservation Officer (SHPO). SHPO consultation is initiated when sufficient information is provided by the CWSRF applicant. The District must retain a consultant that meets the Secretary of the Interior's Professional Qualifications Standards (http://www.nps.gov/history/local-law/arch_stnds_9.htm) to prepare a Section 106 compliance report.

SWRCB-3

Note that the District will need to identify the Area of Potential Effects (APE), including construction and staging areas, and the depth of any excavation. The APE is three-dimensional and includes all areas that may be affected by the Project. The APE includes the surface area and extends below ground to the depth of any Project excavations. The records search request should extend to a 1/2-mile beyond Project APE. The appropriate area varies for different projects but should be drawn large enough to provide information on what types of sites may exist in the vicinity.

SWRCB-4

Other federal environmental requirements pertinent to the Project under the CWSRF Program include the following (for a complete list of all environmental requirements please visit: http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/docs/forms/application_environmental_package.pdf):

- A. Compliance with the Federal Clean Air Act: (a) Provide air quality studies that may have been done for the Project; and (b) if the Project is in a nonattainment area or attainment area subject to a maintenance plan; (i) provide a summary of the estimated emissions (in tons per year) that are expected from both the construction and operation of the Project for each federal criteria pollutant in a nonattainment or maintenance area, and indicate if the nonattainment designation is moderate, serious, or severe (if applicable); (ii) if emissions are above the federal de minimis levels, but the Project is sized to meet only the needs of current population projections that are used in the approved State Implementation Plan for air quality, quantitatively indicate how the proposed capacity increase was calculated using population projections.
- B. Compliance with the Coastal Zone Management Act: Identify whether the Project is within a coastal zone and the status of any coordination with the California Coastal Commission.

SWRCB-5

SWRCB-6

- C. Protection of Wetlands: Identify any portion of the proposed Project area that should be evaluated for wetlands or United States waters delineation by the United States Army Corps of Engineers (USACE), or requires a permit from the USACE, and identify the status of coordination with the USACE. SWRCB-7
- D. Compliance with the Farmland Protection Policy Act: Identify whether the Project will result in the conversion of farmland. State the status of farmland (Prime, Unique, or Local Statewide Importance) in the Project area and determine if this area is under a Williamson Act Contract. SWRCB-8
- E. Compliance with the Migratory Bird Treaty Act: List any birds protected under this act that may be impacted by the Project and identify conservation measures to minimize impacts. SWRCB-9
- F. Compliance with the Flood Plain Management Act: Identify whether or not the Project is in a Flood Management Zone and include a copy of the Federal Emergency Management Agency flood zone maps for the area. SWRCB-10
- G. Compliance with the Wild and Scenic Rivers Act: Identify whether or not any Wild and Scenic Rivers would be potentially impacted by the Project and include conservation measures to minimize such impacts. SWRCB-11

Following are specific comments on the District's draft EIR:

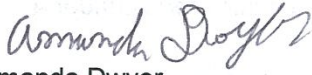
- 1. If the District is seeking CWSRF funding for the Project, please consider the following comments:
 - Provide an analysis of air quality emission data compiled with CalEEMOD or an equivalent air quality emission estimating software. SWRCB-12
 - Provide a Cultural Resources Report consistent with Section 106 requirements. SWRCB-13
- 2. Please provide a species list, less than one year old, from the California Native Plant Society (CNPS), as mentioned in section 4.3.1 of the EIR SWRCB-14

Please provide us with the following documents applicable to the proposed Project if seeking CWSRF or other State Water Board funding: (1) one copy of the draft and final EIR, (2) the resolution certifying the EIR and a Mitigation Monitoring and Reporting Program (MMRP) making California Environmental Quality Act (CEQA) findings, (3) all comments received during the review period and the District's response to those comments, (4) the adopted MMRP, and (5) the Notice of Determination filed with the Los Angeles County Clerk and the Governor's Office of Planning and Research, State Clearinghouse. In addition, we would appreciate notices of any hearings or meetings held regarding environmental review of any projects to be funded by the State Water Board. SWRCB-15

- 4 -

Thank you for the opportunity to review the District's draft EIR. If you have any questions or concerns, please feel free to contact me at (916)341-5686, or by email at Amanda.Dwyer@waterboards.ca.gov, or contact Bahman Ghashghaei at (916)327-9117, or by email at Bahman.Ghashghaei@waterboards.ca.gov.

Sincerely,



Amanda Dwyer
Environmental Scientist

Enclosures (3)

1. Clean Water State Revolving Fund Environmental Review Requirements
2. Quick Reference Guide to CEQA Requirements for State Revolving Fund Loans
3. Basic Criteria for Cultural Resources Reports

cc: State Clearinghouse
(Re: SCH# 2012091035)
P.O. Box 3044
Sacramento, CA 95812-3044

CLEAN WATER STATE REVOLVING FUND

Basic Criteria for Cultural Resources Report Preparation

State Water Resources Control Board
Division of Financial Assistance

For Section 106 Consultation with the State Historic Preservation Officer (SHPO) under the National Historic Preservation Act

CULTURAL RESOURCES REPORT

The Cultural Resources Report must be prepared by a qualified researcher that meets the Secretary of the Interior's Professional Qualifications Standards. Please see the Professional Qualifications Standards at the following website at: http://www.cr.nps.gov/local-law/arch_stnds_9.htm

The Cultural Resources Report should include one of the four "findings" listed in Section 106. These include:

"No historic properties affected"

(no properties are within the area of potential effect (APE; including below the ground).

"No effect to historic properties"

(properties may be near the APE, but the project will not have any adverse effects).

"No adverse effect to historic properties"

(the project may affect "historic properties", but the effects will not be adverse).

"Adverse effect to historic properties"

Note: Consultation with the SHPO will be required if a "no adverse effect to historic properties" or an "adverse effect to historic properties" determination is made, to develop and evaluate alternatives or modifications to the proposed project that could avoid, minimize or mitigate adverse effects on "historic properties."

RECORDS SEARCH

- A records search (less than one year old) extending to a half-mile beyond the project APE from a geographically appropriate Information Center is required. The records search should include maps that show all recorded sites and surveys in relation to the APE for the proposed project, and copies of the confidential site records included as an appendix to the Cultural Resources Report.
- The APE is three-dimensional (depth, length and width) and all areas (e.g., new construction, easements, staging areas, and access roads) directly affected by the proposed project.



We've got the green...
to keep California's water clean.
CLEAN WATER STATE REVOLVING FUND

NATIVE AMERICAN and INTERESTED PARTY CONSULTATION

- Native American and interested party consultation should be initiated at the planning phase of the proposed project to gather information to assist with the preparation of an adequate Cultural Resources Report.
- The Native American Heritage Commission (NAHC) must be contacted to obtain documentation of a search of the Sacred Lands Files for or near the project APE.
- All local Native American tribal organizations or individuals identified by the NAHC must be contacted by certified mail, and the letter should include a map and a description of the proposed project.
- Follow-up contact should be made by telephone and a phone log maintained to document the contacts and responses.
- Letters of inquiry seeking historical information on the project area and local vicinity should be sent to local historical societies, preservation organizations, or individual members of the public with a demonstrated interest in the proposed project.

Copies of all documents mentioned above (project description, map, phone log and letters sent to the NAHC and Native American tribal organizations or individuals and interested parties) must be included in the Cultural Resources Report.

Contact Information: For more information related to the CWSRF Program Cultural Resources and Requirements, please contact Mr. Ahmad Kashkoli at 916-341-5855 or Ahmad.Kashkoli@waterboards.ca.gov

PRECAUTIONS

A finding of **“no known resources”** without supporting evidence is unacceptable. The Cultural Resources Report must identify resources within the APE or demonstrate with sufficient evidence that none are present.

“The area is sensitive for buried archaeological resources,” followed by a statement that **“monitoring is recommended.”** Monitoring is not an acceptable option without good-faith effort to demonstrate that no known resource is present.

If **“the area is already disturbed by previous construction”** documentation is still required to demonstrate that the proposed project will not affect “historic properties.” An existing road can be protecting a buried archaeological deposit or may itself be a “historic property.” Additionally, previous construction may have impacted an archaeological site that has not been previously documented.

SHPO CONSULTATION LETTER

Submit a draft consultation letter prepared by the qualified researcher with the Cultural Resources Report to the State Water Resources Control Board. A draft consultation letter template is available for download on the State Water Board webpage at: http://www.waterboards.ca.gov/water_issues/programs/grants_loans/cwsrf_requirements.shtml



CLEAN WATER STATE REVOLVING FUND

California Environmental Quality Act Requirements

State Water Resources Control Board
Division of Financial Assistance

The State Water Resources Control Board (State Water Board), Division of Financial Assistance, administers the Clean Water State Revolving Fund (CWSRF) Program. The CWSRF Program is partially funded by grants from the United States Environmental Protection Agency. All applicants seeking CWSRF financing must comply with the California Environmental Quality Act (CEQA), and provide sufficient information so that the State Water Board can document compliance with federal environmental laws. The "Environmental Package" provides the forms and instructions needed to complete the environmental review requirements for CWSRF Program financing. It is available at: http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml



We've got the **green...**
to keep California's **water clean.**
CLEAN WATER STATE REVOLVING FUND

Contact Information: For more information related to the CWSRF Program environmental review process and requirements, please contact your State Water Board Project Manager or Mr. Ahmad Kashkoli at 916-341-5855 or Ahmad.Kashkoli@waterboards.ca.gov

LEAD AGENCY

The applicant is usually the "Lead Agency" and must prepare and circulate an environmental document before approving a project. Only a public agency, such as a local, regional or state government, may be the "Lead Agency" under CEQA. If a project will be completed by a non-governmental organization, "Lead Agency" responsibility goes to the first public agency providing discretionary approval for the project.

RESPONSIBLE AGENCY

The State Water Board is generally a "Responsible Agency" under CEQA. As a "Responsible Agency," the State Water Board must make findings based on information provided by the "Lead Agency" before financing a project.

ENVIRONMENTAL REVIEW

The State Water Board's environmental review of the project's compliance with both CEQA and federal cross-cutting regulations must be completed before a project can be financed by the CWSRF Program.

DOCUMENT REVIEW

Applicants are encouraged to consult with State Water Board staff early during preparation of CEQA document if considering CWSRF financing. Applicants shall also send their environmental documents to the State Water Board, Environmental Review Unit during the CEQA public review period. This way, any environmental concerns can be addressed early in the process.

REQUIRED DOCUMENTS

The Environmental Review Unit requires the documents listed below to make findings and complete its environmental review. Once the State Water Board receives all the required documents and makes its own findings, the environmental review for the project will be complete.

- ✓ Draft and Final Environmental Documents: Environmental Impact Report, Negative Declaration, and Mitigated Negative Declaration as appropriate to the project
- ✓ Resolution adopting/certifying the environmental document, making CEQA findings, and approving the project
- ✓ All comments received during the public review period and the "Lead Agency's" responses to those comments
- ✓ Adopted Mitigation Monitoring and Reporting Plan, if applicable
- ✓ Date-stamped copy of the Notice of Determination or Notice of Exemption filed with the County Clerk(s) and the Governor's Office of Planning and Research
- ✓ CWSRF Evaluation Form for Environmental Review and Federal Coordination with supporting documents



waterboards.ca.gov

National Historic Preservation Act (NHPA)

Section 106 of the NHPA requires an analysis of the effects on "historic properties." The Section 106 process is designed to accommodate historic preservation concerns for federal actions with the potential to affect historic properties. Early consultation with appropriate government agencies, Indian tribes, and members of the public, will ensure that their views and concerns are addressed during the planning phase.

Historic properties (i.e., buildings, structures, objects, and archaeological sites 50 years or older) are properties that are included in the National Register of Historic Places or meet the criteria for the National Register.

Required Documents:

- ✓ A draft State Historic Preservation Officer consultation request letter; and
- ✓ A cultural resources report on historic properties conducted according to the Secretary of the Interior's Standards, including:
 - A clearly defined Area of Potential Effect (APE), specifying the length, width, and depth of excavation, with a map clearly illustrating the project APE;
 - A records search, less than one year old, extending to a half-mile beyond the project APE;
 - Written description of field methods;
 - Identification and evaluation of historic properties within the project's APE; and
 - Documentation of consultation with the Native American Heritage Commission and local Native American tribes.

ADDITIONAL INFORMATION

If your project has the potential to affect biological resources or historic properties, the consultation process can be lengthy. Please contact the State Water Board staff early in your planning process to discuss what additional information may be needed for your specific project.

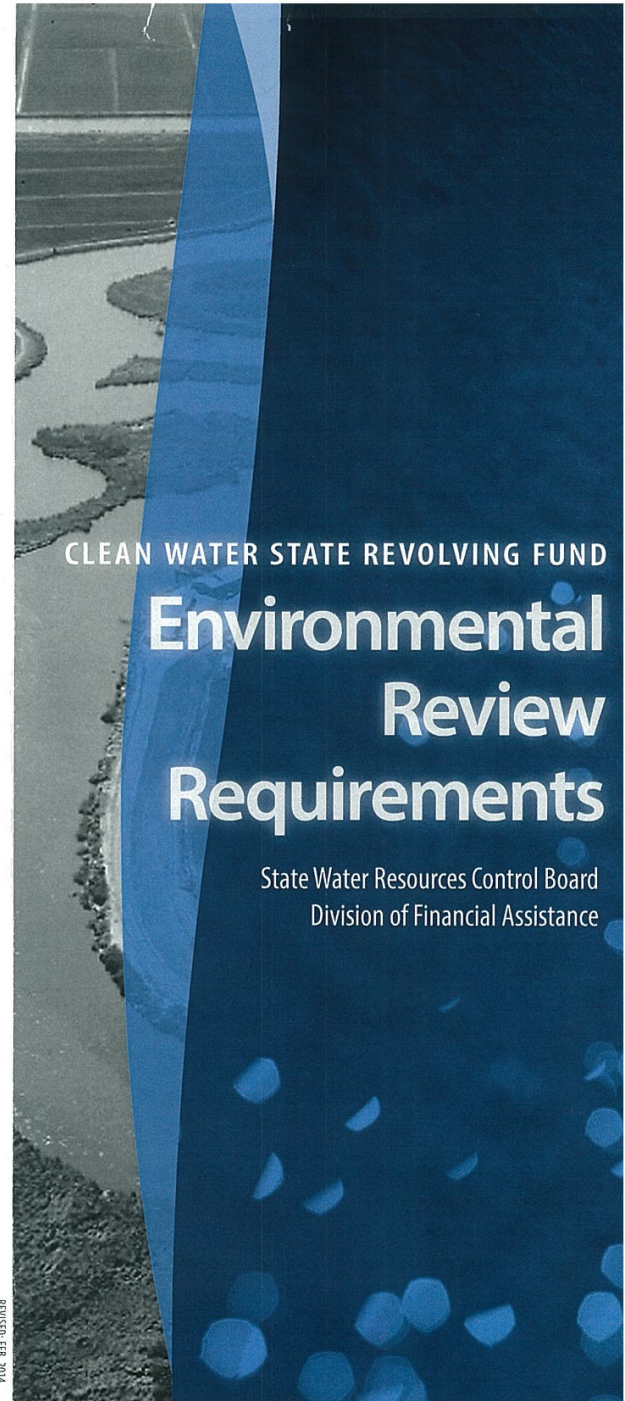
Please contact your State Water Board Project Manager or Mr. Ahmad Kashkoli at (916) 341-5855 or Ahmad.Kashkoli@waterboards.ca.gov for more information related to the CWSRF Program environmental review process and requirements.



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to keep California's water clean.
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CALIFORNIA
Water Boards
STATE WATER RESOURCES CONTROL BOARD
REGIONAL WATER QUALITY CONTROL BOARDS
www.waterboards.ca.gov



ENVIRONMENTAL REVIEW REQUIREMENTS

The Clean Water State Revolving Fund (CWSRF) Program is partially funded by the United States Environmental Protection Agency (EPA), and is subject to federal environmental regulations as well as the California Environmental Quality Act (CEQA). All applicants seeking CWSRF financing must comply with both CEQA and the federal cross-cutting regulations. The "Environmental Package" provides the forms and instructions needed to complete the environmental review requirements for CWSRF financing. The forms and instructions are available at: http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml.

Lead Agency/Applicant

The applicant will generally act as the "Lead Agency" for environmental review. It will prepare, circulate, and consider the environmental documents prior to approving the project. It also provides the State Water Board with copies of the CEQA documents, and a completed "Environmental Evaluation Form for Environmental Review and Federal Coordination" (http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/docs/forms/application_environmental_package.pdf) with supporting documents as part of the "Environmental Package."

Responsible Agency/State Water Board

The State Water Board acts on behalf of EPA to review and consider the environmental documents before approving financing. The State Water Board may require additional studies or documentation to make its own CEQA findings, as well as circulate CEQA documents and other environmental reports to relevant federal agencies for consultation before making a determination about the project financing.

The Applicant must address all relevant federal agencies' comments before project financing is approved.

FEDERAL CROSS-CUTTING REGULATIONS

The CWSRF Program requires consultation with relevant federal agencies on the following federal environmental regulations, if applicable to the project:

- Clean Air Act
- Coastal Barriers Resources Act
- Coastal Zone Management Act
- Endangered Species Act
- Environmental Justice
- Farmland Protection Policy Act
- Floodplain Management
- Magnuson-Stevens Fishery Conservation and Management Act
- Migratory Bird Treaty Act
- National Historic Preservation Act
- Protection of Wetlands
- Safe Drinking Water Act, Sole Source Aquifer Protection
- Wild and Scenic Rivers Act

The following is a brief overview of requirements for some of the key regulations.

Clean Air Act (CAA)

The CAA general conformity analysis only applies to projects in areas not meeting the National Ambient Air Quality Standards or subject to a maintenance plan.

If project emissions are below the federal "de minimis" levels then:

- A general conformity analysis is not required.

If project emissions are above the federal "de minimis" levels then:

- A general conformity determination for the project must be made. A general conformity determination can be made if facilities are sized to meet the needs of current population projections used in an approved State Implementation Plan for air quality.

- Using population projections, applicants must explain how the proposed capacity increase was calculated.

An air quality modeling analysis is necessary of all projects for the following criteria pollutants, regardless of attainment status:

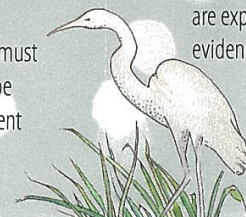
- Carbon monoxide
- Lead
- Oxides of nitrogen
- Ozone
- Particulate matter (PM2.5 and PM10)
- Sulfur dioxide

Endangered Species Act (ESA)

The ESA requires an analysis of the effects on federally listed species. The State Water Board will determine the project's potential effects on federally listed species, and will initiate informal/formal consultation with the United States Fish and Wildlife Service (USFWS) and/or the National Marine Fisheries Service, as necessary under Section 7 of the ESA.

Required Documents:

- ✓ A species list, less than one year old, from the USFWS and the California Department of Fish and Wildlife's Natural Diversity Database;
- ✓ A biological survey conducted during the appropriate time of year;
- ✓ Maps or documents (biological reports or biological assessments, if necessary); and
- ✓ An assessment of the direct or indirect impacts to any federally listed species and/or critical habitat. If no effects are expected, explain why and provide the supporting evidence.



RESOURCES CONTROL BOARD
FINANCIAL ASSISTANCE

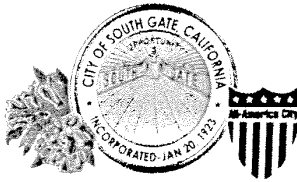
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CA 94244-2120



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BY: _____

Jason Wilkins
Water Replenishment District of Southern California
4540 Paramount Drive
Los Angeles, CA 90712





City of South Gate

8650 CALIFORNIA AVENUE + SOUTH GATE, CA 90280 + (323) 357-9657
FAX (323) 563-9572

ARTURO CERVANTES, P.E.
DIRECTOR OF PUBLIC WORKS
CITY ENGINEER

February 11, 2016

Mr. Jason Weeks
Water Replenishment District of Southern California
4040 Paramount Drive
Lakewood, CA 90712

SCH No. 2012091035
Groundwater Basins Master Plan

Dear Mr. Jason Weeks:

Comments on the Water Replenishment District’s Groundwater Basins Master Plan Draft PEIR

Thank you for this opportunity to review and comment on the proposed Groundwater Basins Master Plan (GBMP) Draft Program Environmental Impact Report (PEIR). Enclosed are comments on the GBMP Draft PEIR.

The issues raised in this letter are noted here and further detailed in Attachment No. 1:

- Request extension of the proposed spreading basin boundary be identified in the Draft PEIR to enhance stormwater capture opportunity through Concept A of the Los Angeles Forebay Storm Water Aquifer Recharge and Recover Facility (ARRF), Project C5. | South Gate-1
- Request a description of the estimated costs, funding sources, and timeline for each of the proposed Projects. | South Gate-2
- Request a more thorough description of the requirements which govern Groundwater Recharge Replenishment Projects, specifically in terms of treatment of stormwater required prior to recharging groundwater basins. | South Gate-3
- Comments pertaining to Environmental Setting, Impacts, and Mitigation Measures (Section 4.8.2, Regulatory Framework) | South Gate-4

The intent of these comments is to underscore the importance of partnering with the City of South Gate to accomplish the similar goal of incorporating stormwater as a valuable and sustainable source of water to be used to recharge the groundwater basins in the Central Basins of the Water Replenishment District (WRD). | South Gate-5

Sincerely,


Arturo Cervantes, Public Works Director
City of South Gate

ATTACHMENT NO. 1

General Comments

1. The City understands this Draft PEIR identifies management strategies and projects in Concept A for the Central Basin, which include replenishment in the Los Angeles Forebay from stormwater in the Los Angeles River.

The Draft PEIR describes a project opportunity in Concept A through the Los Angeles Forebay Storm Water Aquifer Recharge and Recover Facility (ARRF), Project C5, that would divert stormwater from the Los Angeles River into spreading basins near the river within an easement along the I-710 freeway.

The City is writing to you with an urgent request to extend the proposed boundary of the spreading basin (Project C5) to the confluence of the Los Angeles River and Rio Hondo Channel in order to maximize the opportunity to capture stormwater. The City owns a portion of this land and is able to provide an easement if necessary, to aide in partnership of this Project. Additionally, the City has prepared a feasibility study of the area to develop a regional stormwater project, Urban Orchard, which would serve as mutual beneficial project to WRD’s GBMP.

South Gate-6

The Los Angeles County region’s 85 cities are working collaboratively to address the water pollution and to capture stormwater in dozens of watersheds. For example, the City is participating with seven municipalities and the Los Angeles County Flood Control District in the implementation of the Lower Los Angeles River Watershed Management Program (“LLAR WMP”), which was approved by the Regional Water Quality Control Board on July 21, 2015. The LLAR WMP has selected priority “Regional Projects” as one of the programs to achieve stormwater compliance.

South Gate-7

Implementation of the stormwater program for our City is estimated to be in the millions over the next two decades. Funding the clean-up program is proving to be daunting; however, the WRD may provide opportunity to partner with the City to serve a multiple benefit solution to surface water and groundwater quality in the region.

2. The City requests an evaluation of the estimated costs and funding sources to construct and implement Projects, the annual long-term budgeted funding allocation to operate and maintain Projects, and the timeline for each of the proposed Projects. The financial analysis should consider estimated capital costs, operation and maintenance costs, anticipated revenue, and funding sources including but not limited to potential partnerships with local agencies, federal and/or state funded grants, etc. The WRD should consider developing partnerships with local agencies to support multi-beneficial projects. For instance, an opportunity exists to partner with the City in the development of the Urban Orchard, a stormwater recharge project located adjacent to the proposed Los Angeles Forebay Storm Water ARRF, Project C5, which would serve a mutual beneficial project to WRD’s GBMP. If the WRD is to explore opportunities to partner with local agencies, the cost-sharing/funding program should be clearly identified in the Draft PEIR.

South Gate-8

Program Background

3. **Page 2-5, Existing Groundwater Replenishment and Facilities (Figure 2-2).** Identify more landmarks (i.e. I-5 freeway, Rio Hondo Channel, etc.) on Figure 2-2 so that the location of the existing replenishment facilities are clear.

South Gate-9

ATTACHMENT NO. 1

- 4. **Page 2-6, Existing Groundwater Replenishment and Facilities, West Coast Basin.** The narrative describes the West Coast Basin Barrier and Dominguez Gap Barrier systems are shown in Figure 2-1; however, it appears as though the systems are shown in Figure 2-2. South Gate-10
- 5. **Page 2-7, Replenishment Water Sources.** The Draft PEIR describes the additional requirements which govern Groundwater Recharge Replenishment Projects (GRRPs). While the Draft PEIR provides some general requirements, such as determination of retention time (minimum period of time recharged water must remain underground), the narrative lacks specificity or reference to the requirements which govern GRRPs. Revise narrative to provide clarification as to the requirements of utilizing stormwater to recharge groundwater basins proposed in the GBMP. South Gate-11

Program Description

- 6. **Page 3-2, GBMP Location, Table 3-1.** The City is identified in the Central Basin – Montebello Forebay project location; however, it appears as if this is a technical error. The City should instead be identified in the Central Basin – Los Angeles Forebay/River as the City is described in the Los Angeles Forebay Storm Water ARRF (Project C5). Note, this comment also applies to the cities of Los Angeles, Huntington Park, Vernon, Bell, Cudahy, and Maywood, all of which are described in Projects C5 and C10, which affect the Los Angeles Forebay/River. South Gate-12
- 7. **Page 3-9, Storm Water.** The Draft PEIR narrative describes the availability of stormwater that could be captured from the San Gabriel and Los Angeles Rivers; however, the Los Angeles River is described as the average of wet season storm flow while the San Gabriel River is described as the average flow. Furthermore, Page 3-27 describes the capacity of the Montebello Forebay Spreading Grounds, where recharge is typically highest during the wet season; yet, Page 3-9 does not specify the wet season storm flow. Revise to provide the wet season storm flow and average storm flow for both rivers so that it is clear what the estimated available capacity of stormwater is to be expected. South Gate-13
- 8. **Page 3-10, Table 3-3.** Table 3-3 identifies locations of Treatment Plants producing Recycled Water within the WRD service area; however, it would be helpful to know the intended destination of the recycled water (i.e. West Coast or Central Basin). Revise Table to include the addition of a column which would indicate the intended destination of the recycled water if it were procured from the Treatment Plants listed. South Gate-14

Environmental Setting, Impacts, and Mitigation Measures

Note: These comments are intended to highlight errors and omissions in Section 4.8.2. A thorough review of Section 4.8.2 by WRD is recommended as all errors have not been identified.

- 9. **Page 4.8-10, CWA Section 402: National Pollutant Discharge Elimination System (NPDES).** Language states an NPDES permit would need to be obtained from LARWQCB. The NPDES permit would need to be obtained from the SWRCB. South Gate-15
- 10. **Page 4.8-14, Statewide General NPDES Permit for Construction Activity.** Language refers to the Construction General Permit coverage requirement as one or more acre of “soil” disturbance. The Construction General Permit specifies coverage would need to be obtained with one or more acre of land disturbance. South Gate-16

ATTACHMENT NO. 1

- 11. **Page 4.8-15, Statewide NPDES Permit for Industrial Activities.** References to the Industrial General Permit are incorrect. The active Industrial General Permit (Order No. 2014-0057-DWQ) was approved on April 1, 2014 and went into effect on September 1, 2015. Additionally, references to required permit activities are not reflective of Order No. 2014-0057-DWQ.
- 12. **Page 4.8-15, Los Angeles County MS4 Permit.** The discharger – as it is used – is referring to WRD; however, in the context of the MS4 permit, the discharger is the permittees (Cities and County of Los Angeles). This effects interpretation of required activities identified in the document.
- 13. **Page 4.8-15, Los Angeles County MS4 Permit.** Though various requirements of the Los Angeles County MS4 permit were addressed, the Planning and Land Development requirements were omitted. Requirements of the Planning and Land Development Program will apply to this project and should be referenced in this section of the document.

South Gate-17

South Gate-18

South Gate-19



State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 South Coast Region
 3883 Ruffin Road
 San Diego, CA 92123
 (858) 467-4201
 www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



February 12, 2016

Mr. Jason Weeks
 Water Replenishment District of Southern California
 4040 Paramount Drive
 Lakewood, CA 90712
 Email: jweeks@wrd.org

Subject: Comments on the Water Replenishment District’s Program Level Draft Environmental Impact Report for the Groundwater Basins Master Plan; Los Angeles County; SCH# 2012091035.

Dear Mr. Weeks:

The Department of Fish and Wildlife (Department) has reviewed the above referenced Draft Program Environmental Impact Report (DPEIR) for the Groundwater Basins Master Plan (GBMP or Project). The Water Replenishment District of Southern California (WRD) is the lead agency for the DPEIR under the California Environmental Quality Act (CEQA).

The GBMP is a reference document for the entities responsible for managing and maintaining groundwater in the Central Basin and West Coast Basins (CBWCB) generally located in south central and south coastal Los Angeles County. The Project area overlaps with the Santa Monica Bay, Dominguez Channel, Los Angeles River, and San Gabriel River watersheds. The GBMP identifies and evaluates specific projects and management strategies that would increase replenishment and beneficial use of recycled water and captured storm water. The increased replenishment would require increased use of existing spreading grounds, injection wells, and recovery facilities, expanding or upgrading recycled water treatment facilities, and the installation of new water infrastructure including injection and extraction wells, conveyance pipelines, and pump stations. The specific locations, design, operations and biological impacts of these facilities have yet to be finalized. As such, the Project is evaluated in this Draft PEIR at a programmatic level. Individual projects conducted under the GBMP would be implemented in conjunction with other local agencies listed below, which would be considered Responsible Agencies under CEQA:

- Water Replenishment District of Southern California
- West Basin Municipal Water District
- Central Basin Municipal Water District
- Sanitation Districts of Los Angeles County
- City of Los Angeles
- City of Long Beach
- Los Angeles County Department of Public Works, Flood Control District

Implementation of the proposed GBMP projects would occur entirely within existing facilities or through established ROWs where no native vegetation is present or very little managed nonnative vegetation can be found. It is anticipated that all special-status species would have a low potential to occur within the proposed projects’ construction locations.

Jason Weeks
Water Replenishment District of Southern California
February 12, 2016
Page 2 of 3

The following comments and recommendations have been prepared pursuant to the Department’s authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*, and pursuant to our authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines § 15386) to assist the Lead Agency in avoiding or minimizing potential project impacts on biological resources.

Specific Comments

The Department generally concurs with the biological assessment, avoidance and mitigation approaches described in the DPEIR for direct potential effects on the local and regional environment associated with implementation of construction and associated ground disturbances under the draft GBMP.

CDFW-1

Hydrology. The DPEIR, once adopted, sets up a framework to allow WDR to divert storm water from drainages within the San Gabriel River, Los Angeles River, Santa Monica Bay, and Dominguez Channel watersheds and pump groundwater within the CBWCB area beneath these watersheds. Activities associated with the construction of the proposed Project could result in adverse impacts on riparian or wetland habitats.

CDFW-2

The DPEIR is lacking a discussion regarding how the GBMP will reduce surface flows of specific drainages from subsequent water diversions and ground water pumping projects proposed under the GBMP guidelines. The following types of information should be referenced in the GMBP as required analysis for future projects conducted under this Project and to allow the Department to comment on potential affects to biological resources.

1. Historical data for average monthly flows for all effected drainages within the CBWCB both above and below diversion points and extraction wells;
2. A discussion regarding timing and duration of proposed diversions and ground water pumping, and any minimum flow requirements for drainages within the CBWCB;
3. A discussion on how the proposed Project will change the historical average monthly flows below proposed water diversions and from ground water pumping including calculating the percentage of flow reduction, if any, anticipated from this Project.

Cumulative Impacts. Page 5-8 of the PDEIR describes cumulative impacts of the Project on Biological Resources and states: “Therefore, the proposed GBMP projects, when considered together with future related projects in the CBWCB, would not have an incremental impact to biological resources that would be cumulatively considerable.”

CDFW-3

The Final PEIR (FPEIR) should analyze all diversion points in drainages included in the CBWCB Project area to determine how much water is being removed from the channel system and evaluate the significance of the Project’s cumulative impacts to biological resources and watershed health and function. For example WRD’s Project proposal to divert storm water and extract ground water within watersheds in the CBWCB including the San Gabriel River and its tributaries should be analyzed for impacts to biological resources on a cumulative level. The Cumulative Impacts analysis in the FDEIR should also include other projects and policies that will result in the diversion or reduction of surface and subsurface water flows, including projects responsive to climate change or prolonged drought. The analysis should including, but not be

Jason Weeks
Water Replenishment District of Southern California
February 12, 2016
Page 3 of 3

limited to, the Los Angeles County Sanitation Districts' (LACSD) San Gabriel River Treated Wastewater Discharge Reduction proposal. Storm water and groundwater contributions may be important during the dry season and prolonged drought conditions in maintaining flows supporting biological resources. These contributions may be a significant loss minus LACSD's treated waste water effluent or other existing source contributions that are proposed for diversion out of receiving drainages supporting biological resources.

↑
CDFW-3

Thank you for this opportunity to provide comments. If you have any questions regarding the comments provided in this letter, please contact Scott Harris, Environmental Scientist, at (805) 644-6305 or scott.p.harris@wildlife.ca.gov.

Sincerely,



Betty Courtney
Environmental Program Manager I

ec: Erinn Wilson, CDFW, Los Alamitos
Kelly Schmoker, CDFW, Mission Viejo
Scott Harris, CDFW, Ventura
Brock Warmuth, CDFW, Ventura
Christine Medak, USFWS, christine_medak@fws.gov
State Clearing House



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

February 12, 2016

Mr. Jason Weeks
Water Replenishment District of Southern California
4040 Paramount Drive
Lakewood, CA 90712

Dear Mr. Weeks:

Groundwater Basins Master Plan

The County Sanitation Districts of Los Angeles County (Sanitation Districts) received a Notice of Availability of a Draft Program Environmental Impact Report for the subject project on December 18, 2015. Portions of the Groundwater Basins Master Plan (GBMP) Project are located within the jurisdictional boundaries of the Sanitation Districts. The Sanitation Districts are supportive of this planning effort, which in turn should help to develop new markets for recycled water. Use of recycled water is consistent with our mission of converting waste into resources and is an important local drought proof water supply. The Sanitation Districts offer the following minor comments:

LACSD-1

Comments

1. Recycled water availability for the Vander Lans Advanced Water Treatment Facility (Vander Lans) is limited from the Sanitation Districts' Long Beach Water Reclamation Plant (WRP). However, page 3-19 of Section 3.5.3 states that no additional facilities are needed to produce the 8,000 AFY of advanced treated water for increased injection of recycled water into the Alamitos Barrier Gap. Due to the availability concerns with recycled water from the Long Beach WRP, a connection to the Los Coyotes WRP may be needed to supply Vander Lans. The use of Los Coyotes WRP recycled water at Vander Lans is not contemplated in the draft GBMP, but could be to provide a solution should a shortfall of recycled water from the Long Beach WRP occur. If so chosen, it could be noted that the Water Replenishment District of Southern California (WRD) already has an agreement in place with the Sanitation Districts to receive water from Los Coyotes WRP for Vander Lans.
2. The source of the recycled water quantity estimates throughout the GBMP is unclear. Flows within the Sanitation Districts' system have been decreasing due to conservation and drought. Consider noting that recycled water is subject to availability.
3. Projects C1, C2, C7, and C8 (and GBMP Scenarios in Table 4.9-3 CB-A1, CB-A2, CB-A3, CB-A4, CB-B1, and CB-B2) call for additional recycled water from the San Jose Creek WRP (above GRIP volumes) for expanded groundwater recharge. However, recycled water availability at San Jose Creek WRP is limited and it is unlikely that additional volumes of recycled water above GRIP volumes will be available from this plant.

LACSD-2

LACSD-3

LACSD-4

Jason Weeks

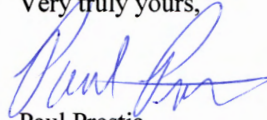
-2-

February 12, 2016

- 4. The Metropolitan Water District (MWD) is contemplating construction of an advanced water treatment plant (AWTP) at the Joint Water Pollution Control Plant (JWPCP) to serve locations and projects such as those contemplated in the GBMP. MWD has expressed an interest in phasing their AWTP facilities based on demand. These facilities would provide the recycled water needed and it may be more cost effective to look at obtaining recycled water as part of a regional project. It may be beneficial to coordinate efforts with them. LACSD-5
- 5. The Puente Hills Landfill is closed and no longer accepting waste. Consider updating applicable sections. LACSD-6
- 6. Page 4.1-7 of Section 4.1.3 and Page 4.12-16 of Section 4.12.3 state that proposed treatment facilities would be located adjacent to existing treatment plants (including the San Jose Creek and Los Coyotes WRPs). Note that there may not be space at Sanitation Districts' facilities for additional WRD treatment facilities. The Sanitation Districts will evaluate each request by a public agency to build advanced water treatment facilities or pump stations at our WRPs on a case-by-case basis. Also, the GRIP AWTP is now located in the City of Pico Rivera, off-site from the San Jose Creek WRP. Consider clarifying this in the text. LACSD-7
- 7. On Pages 7-9 and 7-10 of Section 7.4, please explain how the No Project Alternative includes increases in recharge in the Montebello Forebay Spreading Ground from storm water or recycled water. LACSD-8

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2703.

Very truly yours,



Paul Prestia
Division Engineer
Facilities Planning Department

PP:JL:ddg

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

100 S. MAIN STREET, SUITE 100

LOS ANGELES, CA 90012-3606

PHONE (213) 897-0362

FAX (213) 897-0360

TTY 711

www.dot.ca.gov



*Serious Drought!
Help save water!*

February 12, 2016

Mr. Jason Weeks
Water Replenishment District (WRD) of Southern California
4040 Paramount Boulevard
Lakewood, CA 90712

RE: WRD Notice of Availability Draft Program Environmental Impact Report

Dear Mr. Weeks:

Thank you for including the California Department of Transportation (Caltrans) in the draft document comment period for the Groundwater Basins Master Plan. We have received your NOA dated December 17, 2015.

Caltrans' various units have reviewed this draft document and have compiled all the comments for the proposed project into a comment matrix. The comment matrix is attached for your review.

We appreciate the opportunity to provide input to your planning process and we look forward to continuing discussion on this project. For further assistance, please contact myself at (213) 897-8037 or Le Chen at (213) 897-4595.

Sincerely,

A handwritten signature in cursive script that reads "Leon Romero".

Leon Romero, M.S.
Project Management - South

Enclosure:

Comment Matrix

CC: Le Chen, Environmental Planning

"Caltrans improves mobility across California"

REVIEW COMMENTS: SUMMARY AND RESOLUTION									
Submittal: Draft Program Environmental Impact Report			CODE	A = Accept Comment (correct, add, clarify) B = Will not incorporate C = Resolution of comment in next submittal					
Submitted by: Water Replenishment District of Southern California Circulated by: ESA				RESPONSE				Final Disposition	
Comment No.	Section, Page No. or Study ⁽¹⁾	Reviewer Comments		Response Code ⁽²⁾	By Whom	Response Text ⁽³⁾	"X"	By Whom	Date
1		The impacts to the Route 105 freeway and Metro Green Line need to be addressed as both are major transportation arterials that are below grade level and located within the Central Basin. The safety of the traveling public and the integrity of the above systems are major concerns for the Department.							
2		As the Metro Green Line is located in the center of the Route 105 freeway, Metro needs be notified of this DEIR.							
3		Please identify with specificity the treatment and filtration process that will be implemented for the additional extracted groundwater in the DEIR.							
4		Please identify how the GBMP projects interface with the Rio Hondo/San Gabriel River Spreading Grounds Interconnection Pipeline Project and the Whittier Narrows Conservation Pool Increase Project.							
5		For the Conservation Pool Increase Project noted above, WRD was seeking approval from the Army Corp (USACE) who was to conduct a feasibility study and safety analysis. Please provide a current status of the approval/analysis and address this condition and its potential impacts to the proposed project area.							
6		Please address the outcome of the projected increase in pumping and treatment activity for Route 105 in result of the DEIR proposal.							
7		Please identify the impact of any "federal waters" on the proposed project.							
8		In Figure 3, is it possible to infiltrate the additional water into the subsurface?							
9		In Figure 3, how much of this additional water will replenish beneficial aquifers?							
10		In Figure 3, please identify/describe replenishment as it relates to this EIR.							

REVIEW COMMENTS: SUMMARY AND RESOLUTION								
Submittal: Draft Program Environmental Impact Report			CODE	A = Accept Comment (correct, add, clarify) B = Will not incorporate C = Resolution of comment in next submittal				
Submitted by: Water Replenishment District of Southern California Circulated by: ESA				RESPONSE				Final Disposition
Comment No.	Section, Page No. or Study ⁽¹⁾	Reviewer Comments	Response Code ⁽²⁾	By Whom	Response Text ⁽³⁾	"X"	By Whom	Date
11		The PEIR should assess the potential for encountering contaminated soils, contaminated perched water, and hazardous substances, as the groundwater rises in the Central Basin and West Coast Basin due to the replenish of groundwater. And the potential migration of these contaminants. Not just the local construction sites.						
12		The PEIR should assess the potential impacts on the underground structures of high-rise buildings, as a result of the groundwater rises in the Central Basin and West Coast Basin due to the replenish of groundwater.						
13		This PEIR fails to address the potential impacts on the highways, subways, and public transportation facilities, as a result of the groundwater rises in the Central Basin and West Coast Basin due to the replenishment of groundwater, and limit the assessment only to traffic impacts.						
14		Please make available the ascii text files used with the USGS modflow software.						
15		Please identify with specificity which measures are to be used in determining whether an increase in groundwater elevation will be considered "successful."						
16		Will groundwater increase across the basins uniformly? Or will some areas increase in elevation before others? If some areas will increase in elevation before others, please identify which specificity which areas you are referring to.						
17		Is it possible for the increase in groundwater elevation to mobilize contaminants in soil? In other words, is it possible that properties which are listed by the regional water board as "soil only" impacted sites to become sources of groundwater contamination?						

REVIEW COMMENTS: SUMMARY AND RESOLUTION								
Submittal: Draft Program Environmental Impact Report			CODE	A = Accept Comment (correct, add, clarify) B = Will not incorporate C = Resolution of comment in next submittal				
Submitted by: Water Replenishment District of Southern California Circulated by: ESA				RESPONSE			Final Disposition	
Comment No.	Section, Page No. or Study ⁽¹⁾	Reviewer Comments	Response Code ⁽²⁾	By Whom	Response Text ⁽³⁾	"X"	By Whom	Date
18		Is it possible that the increase in groundwater elevation could cause a significant increase in vapor intrusion to structures (houses, office buildings, etc) in the area?						
19		For Concept B, how was the AFY of extraction arrived at as an additional extraction for the West Coast Basin? Similarly how were the AFY arrived at for the Central Basin?						
20		If work is to be done on or near Route 105, try to minimize the hauling during the peak hours using Rte-105.						
21		The DEIR should address adverse environmental impacts to surrounding communities from the proposed projects.						
22		The hazards to the proposed facilities should be addressed in the PEIR but no mention is made of the hazards in the areas impacted by the rise in groundwater table and increased liquefaction potential, expansive soils.						
23		The cost to mitigate the problems caused by rise in groundwater elevation for the impacted properties needs to be addressed.						
24		Please address the potential impacts of the proposed project on the underground Utilities in the Route 105 area, which include a 4" Gas Line, Telephone underground Duct, Edison underground ducts(power Lines), 6" southern California water line, 12" wsp water line, 6" Gas Line in 10" CSG, in case of earth movement.						
25		Is there any need for access roads? Will the proposed project have impacts to freeways or state highways within the footprint of the proposed groundwater basin?						

REVIEW COMMENTS: SUMMARY AND RESOLUTION								
Submittal: Draft Program Environmental Impact Report Submitted by: Water Replenishment District of Southern California Circulated by: ESA			CODE A = Accept Comment (correct, add, clarify) B = Will not incorporate C = Resolution of comment in next submittal	RESPONSE			Final Disposition	
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26	Section 4.8.2	A proposed Recycle Water Pipeline will cross the 105 and 5 Freeway (App B, Fig B-5). If the Master Plan plans to perform work within the Department's R/W, then mention the NPDES Permit No CAS000003 (Order No. 2012-0011-DWQ) in the document. The Permit regulates stormwater and non-stormwater discharges from the Department's properties and facilities.						
27	Appendix B, Figure B-6	There will be a potential spreading basin along the 710 Freeway. Injection wells will raise the water table and potentially affect subsurface structures, further investigation is needed by WRD. Injection wells along 710 could present similar groundwater issues as Route 105. Route 710 is a critical corridor for trade emerging from the port.						
28	2.1.2 Groundwater Budget	This is historical data. The PEIR should be forward looking toward the impacts of additional storage. Also, this applies to Figure 11.						
29	3.2 Proposed Operations - GRIP	WRD is only discussing replacement water not new water levels. This is not consistent with the Groundwater Management Plan. Please include discussion of new water wells.						
30		CH2M Hill states they modeled the impact of the GRIP, but from the information it doesn't look like they used an increase in water. Please explain.						
31		WRD discusses in the GMBP all of the intended imports and the acre feet but none of these volumes are addressed.						
32	Page 4.9-40 "Groundwater basins master plan	How did the model come up with the groundwater levels increasing five to 10 feet?						
33		Does Caltrans and WRD need to program a project to address any future changes in Caltrans pump and treat facility?						
34		When is the forecasted date/year for the Central Basin to be in "Concept B" Mode?						

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35		When is the estimated timeframe to reach the stage of additional replenishment (above APA) for the Central Basin and project implementation?						
36	Section 4.12-3	Please specifically discuss, under a specific item, the impacts to the existing infrastructure (Route 105)						
37		Did the USGS/Modflow include/factor the Route 105 freeway pumped groundwater?						
38		Address each (if any) project that will utilize Caltrans pumped groundwater and how it will be implemented as part of the GBMP.						
39		Please analyze and list Route 105 pumped groundwater as an alternative to meet the replenishment needs in the central basin in order to maximize the beneficial reuse of the 105 pumped groundwater.						
40	Section 4.9-12	There is mention that the Dominguez Gap Barrier Project (DGBP) will be expanded to provide 100% AWT recycled water by 2018. Will there be any possibility to revive the Agreement between Caltrans and WRD to construct a pipeline from the Caltrans dewatering wells to the DGBP/Seawater barrier site?						
41	Section 4.9-12	Currently, Caltrans treats extracted groundwater for NPDES requirements. With the proposed GBMP, will there be additional constituents that are not currently present and must be treated by the Caltrans facility?						
42	Section 4.9-40	There is mention that groundwater will rise 5 to 10 feet in the vicinity of the existing Caltrans dewatering wells. How will this be mitigated to protect the freeway facility?						
43	Section 4.9-41	Mitigation measures (GW-L1, 2 & Q7) need to include affected entities in discussions for monitoring their respective sites.						
44	Table 4.10-1	Include Caltrans under the jurisdiction/entity column, where proposed GBMP projects will be implemented.						

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45	Section 4.10.3	List potential impacts to freeway facilities, where GBMP projects will occur.						
46	Table 5-2	For Caltrans projects, please insert updated/expected completion years for the status column.						
47	Section 7-13	There is mention that a "no project alternative" would be slightly less potential for water levels to increase and affect surface/subsurface infrastructure. How was this conclusion drawn?						
48	Table 7-1 & 7-3	These tables should include a category for infrastructure and given a proper impact category.						
49	4.2.1 2013 Recycled Water Policy (RWP)	Provide predictions of impact to water quality downgradient of the MFSG where concentrations may exceed Basin Plan.						
50	4.2.2 Groundwater Replenishment Regulations (GRRs)	Table 8 list CECs requirement as at least 90 percent removal based on an occurrence study of treated recycled water. Will this concentration be a moving target or fixed for the life of the permit? What responsibility will WRD take when the water quality of downgradient users has been degraded by high concentrations of CECs when an unspecified 90 percent removal is used? Depending on the concentrations, the 90 percent removal could be very high and exceed permitted discharge limits, action levels, goals, and/or MCLs and not comply with RWQCB's anti-degradation policy. Also, how will WRD address other constituents such as metal, VOCs, SVOC, etc.						
51	4.2.4. Constituents of Emerging Concern	Were all CECs evaluated at nanogram concentrations? Are Nanomaterial contaminants included in the CECs?						

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52	4.2.4. Constituents of Emerging Concern	• DWEL is calculated using TDI x weight/water consumption. Explain if Cal/EPA, Office of Environmental Health Hazard Assessment (OEHHA) was consulted and agreed with this approach, and how it was determined to use equation that differs from OEHHA that uses relative source contribution, uncertainty factor, different water consumption, and upper 95% confidence limit on the cancer potency slope. State if this is more or less conservative.						

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53	7.2. Risk Assessment	<p>This section states that the USEPA Office of Drinking Water evaluation of risk uses 10-4 risk level as the baseline risk for all regulations and 10-6 as the de minimis risk level, where de minimis risk levels infer that the activity is essentially "risk free."</p> <p>This section should be revised to reflect the Risk Assessment Guidance for Superfund that does not define risk as described in this document. A risk of 1 x 10-6 is not "risk free" but at a level in which one person in a million will develop cancer with exposure. Selection of risk greater than 1 x 10-6 risk, i.e., 1 x 10-5 to 1 x 10-4 is a risk management decision and must take into account the toxicity of the chemical itself, cumulative risk, hazard index, as well as the potential exposure of individuals using the water.</p> <p>With the apparent exception of radon, US EPA considers only ingestion of drinking water in calculating negligible risk levels (1 x 10-6) for chemical contaminants. In this way the California method which considers the inhalation and dermal absorption routes of exposure, is more health protective than the US EPA method which considers only ingestion. Was USEPA or California method used to calculate risk? If the California method was not used, explain why. Also, was an ecological risk assessment performed and what were the results to ecological receptors, including food chain.</p>						
54		When traffic control/handling plans are available for GBMP projects, please submit them to Caltrans for review.						
55		Please provide the methods of groundwater elevation simulation, files used to run the simulations in Modflow, and the simulated quantities of water conserved at the Rio Hondo and San Gabriel Spreading grounds.						

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56		The change in groundwater elevation will impact existing structures such as the pavement of I-105, bridges (overcrossings and undercrossings), and existing rail facilities (i.e. metro green line rail and station facilities). Has liquefaction, settlement, or inundation of the I-105 and rail facility been considered as part of any of your studies?						
57		Please provide any specific volumes of water or locations of recharge (by spreading or injection depending on stated scenarios) so Caltrans can evaluate the potential change in groundwater elevation.						
58		Some potential geotechnical hazards are considered in the GBMP DEIR such as liquefaction to proposed structures that will be constructed for the projects proposed by the GBMP. However, no consideration of liquefaction to existing structures has been discussed in the GBMP DEIR. WRD proposes to increase groundwater storage in the Central and West Coast Basins (CBWCB) but does not specify how "increased storage" will be achieved, or how "storage" will be measured to evaluate progress/completion of the various projects.						
59		There is no explanation of how WRD will apply the additional 103,250 AFY to the CBWCB area. Caltrans is not able to quantify the impact to existing highway and bridges structures from the proposed additional 103,250 AFY of additional water to be recharged to the Central Basin from the information provided in the GBMP DEIR.						
60		WRD concludes that the impact of the rise in groundwater elevation will be "less than significant" with mitigation. However there are no results of analysis presented to demonstrate any consideration of geotechnical hazards to existing structures (highway pavement and bridges) from liquefaction, settlement or inundation.						

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61		Appendix C does not provide specific information on how recharge and extraction are modeled and no output files are provided from simulation modelling, so it is not possible to evaluate the conclusions stated by CH2M HILL.						
62	Appendix C	Tables 4, 5, and 6 of Appendix C of the GBMP DEIR (page 20-22) provides a summary of the water volume CH2M HILL may have applied to the simulation modeling. It appears that the model simulation applies a lesser quantity of water spread in the 10 model years, as shown in Table 5 compared to the actual years analyzed, as shown in Table 4.						
63	Section 4.7 Hazardous and Hazardous Materials	This section needs to state the impact on the environment from the hazardous materials and mitigation measures needed to minimize hazards.						
64	Subsection Heading – Hazardous Materials	This section cites Title 22 of California Code of Regulations, §66261 et. al. for hazardous waste and identifies it as hazardous materials. Revise this section to correctly refer to hazardous waste. Not all hazardous waste regulations apply to hazardous materials.						
65	Subsection Heading – Hazardous Materials	Hazardous waste includes listed RCRA hazardous waste, non-RCRA hazardous waste, and Special Waste.						
66	Subsection Heading – Hazardous Materials	Sentence two, 22 CCR §66261.10 applies to hazardous waste not material. Include increase in mortality, and correct "substantial presence" to "substantial present" (meaning an existing hazard to human health).						

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67	Page 4.7-4 Environmental Database Review	A Phase I ESA needs to be performed because the environmental database review may not identify all sites with the presence or likely presence of hazardous substances and petroleum products on, in, or at properties or identify Recognized Environmental Conditions (RECs), Historical RECs, and Controlled RECs. The environmental databases maintained by regulatory agencies often remove sites after closure or NFA determination or do not contain documents with pertinent information to assess the sites. Also, a site visit and interviews provide important information about hazardous materials releases and waste management that cannot be obtained on a website.						
68	Section 4.7.2 Regulatory Framework	Federal, RCRA. Include that California is authorized by USEPA to implement RCRA and is responsible for regulating generators, treatment, storage and disposal facilities, and management of hazardous waste.						
69	Section 4.7.2 Regulatory Framework	Hazardous Materials Worker Safety Requirements. Clarify that In California, the regulatory agency responsible for ensuring worker safety is Cal/OSHA. Cal/OSHA regulations are contained in Title 8 California Code of Regulations.						
70	Section 4.7.2 Regulatory Framework	Transportation of Hazardous Waste. Include that all transporters of hazardous waste are required to participate in CHP's Biennial Inspection of Terminal (BIT) Program.						
71	Section 4.7.2 Regulatory Framework	Page 4.7-9 Waste Classification Criteria. Include in hazardous waste classification the following: listed RCRA hazardous waste, non-RCRA hazardous waste, and Special Waste.						
72	Section 4.7.2 Regulatory Framework	Toxicity also include acute oral LD50 , acute dermal LD50, acute inhalation LC50, and acute aquatic 96-hour LC50. Describe the other characteristics that would deem waste as hazardous as was described in detail for toxicity (i.e., corrosivity, reactivity, ignitability).						

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73	Section 4.7.3 Impacts and Mitigation Measures	Routine Hazardous Materials Transport, Use, and Disposal, Impact 4.7-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (Less than Significant) This section states that the project would require routine transport and use of new chemicals for purposes of producing advanced treated recycled water with less than significant impacts to the environment and No Required Mitigation Measures. The ultimate location and design of the treatment facilities is not fully know. Even without knowing the location and design, a discussion of the typical mitigation measures to prevent or minimize impact to the environment needs to be stated. The DEIR should discuss the known activities already stated such as:						

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Comment 73 continued		Gasoline and other hazardous material liquids will be contained in USDOT-approved containers for storage and transport; - secured, fenced storage areas with secondary containment; daily inspection of containers and storage areas; - contingency plan for releases to the ground with containment and remediation actions defined; - use of equipment and vehicles that comply with the ARB regulations for low emissions; - use of good housekeeping practices; - transport under uniform hazardous waste manifest, using DTSC-registered transporter, transporter in the CHP BIT Program, have a contingency plan in-place for containment and cleanup of any spills, dispose of waste at an appropriate California-permitted disposal facility, use of ELAP certified lab to ensure waste is classified properly - transportation routes that avoid peak traffic hours and residential areas as measures to minimize risk of accidents; no transport of hazardous substances and waste during inclement weather.						

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74	Section 4.7.3 Impacts and Mitigation Measures	Accidental Release of Hazardous Materials, Impact 4.7-2: The proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Less than Significant with Mitigation) - Paragraph two, sentence one. Exposure to workers and residents may be in the form of contaminated vapors from the volatile organic compounds (VOCs) that will be released to the atmosphere during soil disturbance and groundwater extraction activities. The proposed project will be constructed in areas with VOCs contamination in soil and groundwater. - Discussion of the water treatment systems used and any emissions/vapors, degradation products from treatment						
75	Section 4.7.3 Impacts and Mitigation Measures	Hazardous Materials Near Schools, Impact 4.7-3: Construction of the proposed project could emit hazardous emissions or handle hazardous or acutely hazardous material, substances, or waste within one-quarter mile of an existing or proposed school. (Less than Significant with Mitigation). - Need to include air monitoring to determine if emissions are migrating off-site and toward schools. Mitigation measures need to include stop work if school is downwind of construction activities that could impact schools. - Include compliance with SCAQMD Rules 403 and 1166 at a minimum.						

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76	Section 4.7.3 Impacts and Mitigation Measures	Impact 4.7-4: Operation of the proposed treatment facilities could emit hazardous emissions or handle hazardous or acutely hazardous material, substances, or waste within one quarter mile of an existing or proposed school. (Less than Significant). This section states that treatment facilities would already have a HMBP, RMP, and ERP on file that would require updating to include the new facilities and chemicals and No Mitigation Measures listed. - Explain what measures that are contained in the HMBP, RMP, and ERP and include them in the Mitigation Measures. These plans need to be made available for public comment.						
77	Section 4.7.3 Impacts and Mitigation Measures	Hazardous Materials Sites Impact 4.7-5: The proposed project could be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, could create a significant hazard to the public or the environment. (Less than Significant with Mitigation) - Clarify that the Phase I Environmental Site Assessment will be performed in accordance with ASTM 1527-13 or latest version and includes petroleum hydrocarbons. - In addition to Mitigation Measures HAZ-1, HAZ-2, and HAZ-3, need to include proper construction of injection and extraction wells and piping so they will not cause cross contamination or exacerbate contamination. - HAZ-3 need to include soil-vapor sampling if one of the concerns is for safety of construction workers.						

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			78	Hazardous Materials Section	CECs are proposed to have a requirement of at least 90 percent removal based on an occurrence study of treated recycled water. Will this concentration be a moving target or fixed for the life of the permit? What responsibility will WRD take when the water quality of downgradient users has been degraded by high concentrations of CECs when an unspecified 90 percent removal is used? Depending on the concentrations, the 90 percent removal could be very high and exceed permitted discharge limits, action levels, goals, and/or MCLs and not comply with RWQCB's anti-degradation policy. Also, how will WRD address other constituents such as metal, VOCs, SVOC, etc.			
79	Hazardous Materials Section	Section 4.2.4 Constituents of Emerging Concern. Were all CECs evaluated at nanogram concentrations? Are Nanomaterial contaminants included in the CECs?						
80	Hazardous Materials Section	DWEL is calculated using TDI x weight/water consumption. Explain if Cal/EPA, Office of Environmental Health Hazard Assessment (OEHHA) was consulted and agreed with this approach, and how it was determined to use equation that differs from OEHHA that uses relative source contribution, uncertainty factor, different water consumption, and upper 95% confidence limit on the cancer potency slope. State if this is more or less conservative.						
81	Hazardous Materials Section	Provide predictions of impact to water quality downgradient of the MFSG where concentrations may exceed Basin Plan.						

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82		A scenario consisting of only increasing the quantity of water conserved at the Rio Hondo and San Gabriel Spreading Grounds could be used to assess the potential of rise in groundwater elevation in the CBWCB area. Assuming water is available and the Rio Hondo/San Gabriel Spreading Grounds conserve 180,000 AFY for 10 years, we believe groundwater elevation in the I-105 area could rise to pavement elevation in 5 years from the initiation of a project with a similar scenario. Based on this analysis, we believe Concept B could result in a rise of groundwater elevation to pavement grade at the I-105 segment between I-710 and I-605.						
83		An increase in groundwater elevation would adversely affect bridge foundations for structures at the interchanges of I-710/I-105 and the I-605/I-105, in addition to overcrossing bridges along I-105 between I-710 and I-605. No specific detail of project scenarios are provided in the GBMP DEIR. Because of this deficiency, Caltrans cannot validate any modeling assumptions used to evaluate the possibility of the rise of groundwater elevation as a result of Concept B on existing highway structures.						
84		In order for Caltrans to determine an increase cost for dewatering as a result of groundwater recharging, more detailed analysis is required by the GBMP/WRD.						
85		There are additional, existing wells along Route 105 located from Paramount Blvd to Route 605. These wells also need to be factored into the DEIR analysis.						
86		Any extra incurred effort and costs by Caltrans for additional dewatering derived from the GBMP needs to be addressed.						
87		Provide a beneficial use of the groundwater pumped from Caltrans wells along Route 105.						

(LA County Department of Public Works)

February 25, 2016

Mr. Jason Weeks
Water Replenishment District of Southern California
4040 Paramount Drive
Lakewood, CA 90712

Dear Mr. Weeks:

**DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (DPEIR)
GROUNDWATER BASINS MASTER PLAN (GBMP)
WATER REPLENISHMENT DISTRICT OF SOUTHERN CALIFORNIA (WRD)**

Thank you for the opportunity to review the DPEIR for the proposed GBMP to provide a single reference document for the entities responsible for managing and maintaining the West Coast and Central groundwater basins. The GBMP identifies and evaluates specific projects and management strategies that would increase replenishment and beneficial use of recycled water and captured storm water. The increase replenishment would require increased utilization of existing spreading grounds, injections wells, and recovery facilities, expanding or upgrading recycled water treatment facilities, and the installation of new water infrastructure including injection and extraction wells, conveyance pipelines, and pump stations.

For specific revisions, additions, or deletions of wording directly from the project document the specific section, subsection, and/or item along with the page number is first referenced then the excerpt from the document is copied within quotations using the following nomenclature:

- Deletions are represented by a ~~striketrough~~.
- Additions are represented by *italics* along with an underline.
- Revisions are represented by a combination of the above.

LACDPW-1

The following are County of Los Angeles, Department of Public Works comments and are for your consideration and relate to the environmental document only:

Executive Summary

1. Table ES-1, page ES-17, Surface Hydrology and Water Quality, Item 4.8-1 states “*during construction of proposed facilities pollutants could be introduced to surface waters via runoff from construction sites and violate water quality*”

LACDPW-2

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standards or waste discharge requirements” and no mitigation measures are required. The stormwater and non-stormwater runoff from construction sites need to be mitigated under the requirements of the 2009 Construction General Permit, 2015 Los Angeles Region Municipal Separate Storm Sewer System NPDES Permit (MS4 Permit) and Los Angeles County Low Impact Development (LID) Ordinance, where applicable. Revise accordingly.

LACDPW-2

- 2. Table ES-1, page ES-17, Surface Hydrology and Water Quality, Item 4.8-3, revise the paragraph

“The placement of new aboveground project facilities could alter the existing drainage patterns of project sites and affect erosion, siltation, or flooding” and “all new drainage facilities shall be designed in accordance with standards and regulations set forth in the Hydrology Manual of the Los Angeles County Department of Public Works. In addition it shall comply with the Low Impact Development Ordinance (LID) and its accompanying LID Manual for stormwater volume retention and hydromodification requirements, where applicable.”

LACDPW-3

If you have any other questions regarding executive summary comments, please contact Richard Gomez of Watershed Management Division at (626) 458-4322 or rgomez@dpw.lacounty.gov.

LACDPW-4

Section 2, Program Background

- 1. Section 2.2.1, Central Basin, 2nd paragraph, page 2-4; the treated recycle water is not provided by Long Beach Water Reclamation Plan. Revise the following sentence:

“The Alamitos Gap Barrier Project (AGBP) is a seawater intrusion barrier that injects imported water (provided by the City of Long Beach) and advanced-treated recycled water (provided by the Leo Vander Lans Plant Long Beach Water Reclamation Plant) as the Leo Vander Lans Plant takes the tertiary treated water from Long Beach Water Reclamation and further treats it to supply the AGBP into 43 wells located along the coastal border between Los Angeles and Orange Counties. It has been in operation since 1964. The barrier system is owned by Los Angeles County Department of Public Works and Orange County Water District, operated, and maintained by the Los Angeles County Department of Public Works (LACDPW).”

LACDPW-5

- 2. Section 2.2.2, West Coast Basin, 2nd paragraph, page 2-4; revise the following sentence:

LAWDPW-6

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“The Dominguez Gap Barrier Project consists of 44 94 injection wells spaced over four miles along the Dominguez Channel. It has been in operation since 1969 and also utilizes ~~both potable and~~ advanced treated recycled water provided by the Los Angeles Department of Water and Power (LADWP) City of Los Angeles and the potable water is supplied by the West Basin Municipal District. LADWP on occasion substitute diluent water when they have issues meeting treatment demand to assure a steady flow into the barrier. Both barrier systems are shown on Figure 2-1. ~~These two~~ The barrier systems are solely also owned, operated, and maintained by LACDPW similar to the Alamitos Gap Barrier Project.”

LACDPW-6

3. Section 2.3, Replenishment Water Sources, second paragraph, page 2-6; the document states that 8 mgd of Long Beach WRP’s is advanced treated and used in the AGBP. The 8 mgd is the peak flow of the Long Beach WRP, but recent discussion with Leo Vander Lans Plant, indicate that they may need to shut down for a couple of weeks every two to three months for maintenance. If the frequency is 2 months, that would give an average daily production of approximately 6 mgd; every three months would be 6.7 mgd. Revise accordingly.

LACDPW-7

4. Figure 2-2, show the Whittier Narrows Dam (Rio Hondo Side) which accounts for a large portion of the replenishment of the Central Basin especially import water from CenB-48 and reclaim from the San Jose plant. The Rio Hondo side of WND accounts for a large portion of the water replenished numbers called out by the report.

LACDPW-8

5. Section 2.5.1, Water Independence Now, page 2-8; a significant portion of reclaim deliveries to the Central Basin are operationally sent to the Whittier Narrows/Rio Hondo side through Zone 1 Ditch for Central Basin replenishment. The replacement of import directly to San Gabriel Coastal Spreading Grounds (SGCSG) amounts to an increase in water delivered to the facility for recharge purposes. The 10,000 AFY due to the Advance Water Treatment should be considered a new replenishment at the SGCSG facility.

LACDPW-9

6. Section 2.5.3, Recycle Water Program, page 2-9; the recycled injection began in 1995. The document states that it began in 1994. Revise accordingly.

LACDPW-10

7. Section 2.5.1, Water Independence Now, Groundwater Improvement Reliability Project (GRIP), page 2-8; the document refers “GRIP” as Groundwater Improvement Reliability Project, but should be “Groundwater Reliability Improvement Project.” Revise accordingly.

LACDPW-11

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- 8. Section 2.5.1, Water Independence Now, Leo J. Van Water Treatment Facility Project, Page 2-8; in our comment no.3, the plant would likely need a shutdown at least every three months for two weeks of maintenance. With the maintenance schedule, the maximum export that the plant could provide to the barrier in one year is approximately 7,500 AFY. The export would still be enough to fully supply the barrier for most years of operation at current injection rates. However, with the additional 17 new wells by OCWD, it may not be enough to provide 100 percent capacity. LACDPW-12

If you have any other questions regarding program background comments, please contact Rudy Rivera of Water Resources Division at (626) 458-6147 or rrivera@dpw.lacounty.gov. LACDPW-13

Section 3, Program Description

- 1. Section 3.5.2, GBMP Water Replenishment Components, page 3-9; the first paragraph suggests that an additional 48,000 AFY of recycled water could be injected into the barriers. That equates to injecting 66 cfs more into the barriers beyond current usage. Doing this is beyond the criteria of the agreement between LACFCD and WRD which states that the barrier is to be operated to prevent seawater intrusion only and not recharge the aquifers. Revise accordingly. LACDPW-14

- 2. Table 3-2, Artificial Replenishment in WRD Service Area by Basin, Page 3-4; indicate the portion of the Existing Artificial Replenishment is attributable to the San Gabriel River reach of the Montebello Forebay. LACDPW-15

- 3. Figure 3-1, Proposed Geographic Locations of GBMP Projects; the GBMP is proposing several injection and extraction wells within the Los Angeles River (north of I-105) area. Close coordination with the future AB530 Working Group is recommended to minimize conflicting plans between the GBMP and the AB530's revitalization plan for the Lower LA River. LACDPW-16

- 4. Table 3-3, Treatment Plants Producing Recycled Water Within the WRD Service Area, page 3-10; the Capacity listed in the table is the maximum production rate. As discussed previously LVLWTF would not be able to produce an average of 8 MGD over the course of a year due to shutdowns. In addition the Capacity of TIWRP is listed as 5 MGD when stated previously they are currently expanding the plant to produce 12 MGD. Revise accordingly. LACDPW-17

- 5. Section 3.5.2, GBMP Water Replenishment Components, Recharge Mechanisms, page 3-11; the document indicates that both the West Coast Basin LACDPW-18

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Barrier Project (WCBBP) and Dominguez Gap Barrier Project (DGBP) will be utilized to increase replenishment opportunities. Both of these systems are aging and to push flows approaching maximum design rates may require rehabilitation of the piping network and wells. The document should disclose any proposed rehabilitation of the piping networks and wells.

LACDPW-18

6. Section 3.5.2, GBMP Water Replenishment Components, Recycle Water, page 3-8; close coordination with WRD, County Sanitation, and Upper San Gabriel Valley Municipal Water District (USGVMWD) is recommended. USGVMWD is proposing a 36-inch waterline that will use San Jose Creek WRP as a source to spread approximately 11,000 AFY of reclaimed water at Santa Fe Spreading Grounds. This may affect the availability of reclaimed water for the future project as part of the GBMP plan.

LACDPW-19

7. Table 3-4, Proposed Seawater Intrusion Barrier Recycled Water Injection Increases (AFY), page 3-12; for Dominguez Gap Barrier Project, the total for Concept B is listed as 13,000 instead of 15,000. In Table 3-4 it shows a two to three times increase in the average injection rates into the barriers, nearing the design thresholds of both. In addition, the summaries of Concept A and Concept B in the Executive Summary on Page E-5, Concept A would require an increase of 18,000 AFY over current conditions and an additional 30,000 AFY beyond that in the WCBBP. Under the proposal in Table 3-4, the existing injection barriers are planned to install all of the 18,000 AFY increase under Concept A and half of the additional 30,000 AFY under Concept B. In addition under Concept B the proposed average injection rate for the year is 55.25 cfs for WCBBP and 17.96 cfs for DGBP. The maximum that we would feel comfortable pushing through the system without major upgrades right now is 40-45 cfs and 12-15 cfs respectively.

LACDPW-20

8. Table 3-5, West Coast Basin and Central Basin GBMP Strategies and Projects: Concept A and Concept B, page 3-16 Strategy C0-B lists the 2,000 AFY going into the AGBP as a new replenishment volume. It is a substitution than new volume. The total amount being injected into the AGBP will not increase (as stipulated in the Recharge Mechanisms section of the document). We will just be replacing the currently used imported water with advanced treated recycled water. Revise accordingly. In addition, Table 3-5 needs to be updated to indicate the existing facilities as MFSG–Rio Hondo and MFSG–San Gabriel in order to quantify where new replenishments are to be transported. Revise accordingly.

LACDPW-21

9. Increase injection of Recycled Water at AGBP (Project C0), page 3-19; the document assumes that all reclaim provided by AWT will be delivered to SGCSG via the existing pipeline. Operationally, prior to storms, reclaim water in the pipeline is switched to bypass the facility and flow to the ocean. This maximizes

LACDPW-22

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flood control and storm water conservation. The project description should state that AWT deliveries to SGCSG will be suspended prior to significant storms. Revise accordingly. LACDPW-22

10. Increased Replenishment at the Montebello Forebay (Projects C1, C2, C3 and C4), page 3-19; the quantities shown on the document are not consistent and needs to be updated to reflect approximately a ten year averages (2000 through 2009). Revise accordingly. LACDPW-23

11. Increased Replenishment at the Montebello Forebay (Projects C1, C2, C3 and C4), page 3-19; the project C2 should clarify that another AWT different form the one listed in the C0-A is proposed. Otherwise the AWT plant within Project C2 is redundant with CO-A. Revise accordingly. LACDPW-24

12. Groundwater Basin Optimization Pipeline (Project C6), page 3-20; the concept to use extraction wells located 0.5 mile away from the SGCSG to reduce groundwater ponding and thereby increasing spreading grounds storage capacity is not considered effective. Losses as high as the 17,000 AF would have to be bypassed along the Rio Hondo River. In that case, it is the inflow into the COE Whittier Narrows Dam that determines whether storm flows can be held for replenishment purposes. When the COE dam goes "Flood Control", which means the release of large flows for public protection, extraction wells will not serve their intended purpose. LACDPW-25

13. According to existing LACDPW Hydrologic Report records, an average of approximately 45,000 AF of reclaim and 24,000 AF of Import water was delivered to the Central Basin MFSG from 2000-2009 water years and since then the average reclaim and import water delivered (2010-2013) was approximately 52,000 and 9,000 AF respectively. This already represents a significant shift to increased pipeline flow directly in SGCSG. The addition of AWT flows (10,000 AF) does not seem feasible. LACDPW-26

14. The documented SJRP pipeline flow into SGCSG from 2009 to present indicates that approximately 21,000 AF of reclaim has already been increased to the San Gabriel Coastal Spreading Grounds (see attached graph). These flows are from the existing SJRP. 10,000 AF of additional flows from the proposed AWT plant would represent a potential detrimental increase in water delivered to the facility, and not the replacement of one type of water in lieu of another. The statement should be corrected to match existing and proposed conditions. LACDPW-27

15. Section 3.8, Required Approvals, page 3-29; recommend approval from US Army Corp of Engineers for Section 408 Permit. LACDPW-28

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If you have any other questions regarding comment numbers 1, 2, 4, 5, and 7 through 14, please contact Rudy Rivera of Water Resources Division at (626) 458-6147 or rrivera@dpw.lacounty.gov.

LACDPW-29

If you have any other questions regarding comment numbers 3, 6 and 15, please contact Richard Gomez of Watershed Management Division at (626) 458-4322 or rgomez@dpw.lacounty.gov.

LACDPW-30

Section 4, Environmental Settings, Impacts, and Mitigation Measures

1. Section 4.8, Regulatory Framework, Statewide NPDES Permit for Industrial Activities, Page 4.8-15; the current Industrial General Permit was adopted in 2014. The document states the General Permit was adopted in 1993. Revise accordingly.

LACDPW-31

2. Section 4.8, Regulatory Framework, The Los Angeles River Watershed, page 4.8-3; the reports states eight major tributaries, but mentions seven. Revise accordingly.

LACDPW-32

3. Section 4.8, Regulatory Framework, Los Angeles County MS4 Permit, first paragraph, page 4.8-15; revise the following sentence:

LACDPW-33

“The Los Angeles County Municipal Separate Storm Sewer System (MS4) Permit recently updated on December 28, 2012 (Order No. R4-2010-0175 R4-2012-0175 was amended in June 2015 under Order No. WQ 2015-0075.”

4. Section 4.8 Regulatory Framework, Los Angeles County MS4 Permit, first paragraph, page 4.8-15; the MS4 Permit applies to all construction activities including those greater than one acre. The document states that MS4 Permit would apply to proposed construction activities disturbing less than an acre. Revise accordingly.

LACDPW-34

If you have any other questions regarding environmental settings comments, please contact Richard Gomez of Watershed Management Division at (626) 458-4322 or rgomez@dpw.lacounty.gov.

LACDPW-35

Section 7, Alternative Analysis

1. CEQA guidelines require the lead agency to describe a range of reasonable alternatives to propose that could significantly lessen environmental impacts. Aside from the two stormwater projects sponsored by WRD, other proposed

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projects to capture, treat, and infiltrate stormwater to augment groundwater supplies and help replenishment efforts have not been identified in the Draft PEIR for the GBMP. WRD should inquire if the Enhance Watershed Management Programs (EWMP) groups or other stormwater planning groups in the Central and West Coast Basins have alternative projects that could infiltrate onsite or be piped up to an unconfined aquifer to augment groundwater supplies. The GBMP should account for possible stormwater infiltrated at sites with existing and proposed decentralized Green Infrastructure, Low Impact Development (LID), and Best Management Practice (BMPs), and model the stormwater infiltrated at these various sites.

LACDPW-36

- 2. The GBMP should acknowledge recent stormwater planning activities of other agencies, specifically the LA Basin Stormwater Conservation Study and EWMPs groups.

LACDPW-37

If you have any other questions regarding environmental settings comments, please contact Richard Gomez of Watershed Management Division at (626) 458-4322 or rgomez@dpw.lacounty.gov.

LACDPW-38

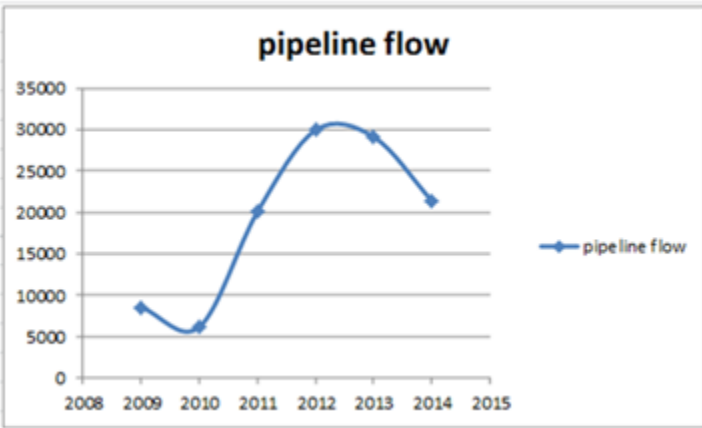
If you have any other questions or require additional information, please contact Ruben Cruz of Land Development Division at (626) 458-4910 or rcruz@dpw.lacounty.gov.

LACDPW-39

RC:

P:\dpub\SUBPCHECK\Plan Checking Files\Projects not associated with a TR-PM-CUP-Single Lot-Permit\GROUNDWATER BASIN MASTER PLAN\DEIR\2015-12-21 DEIR SUBMITTAL\2016-02-18 Groundwater Basin Master Plan.rtf

Attach:



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Scientific Name	Common Name	Family	Lifeform	Rare Plant Rank	State Rank	Global Rank
Abronia maritima	red sand-verbena	Nyctaginaceae	perennial herb	4.2	S3S4	G4
Aphanisma blitoides	aphanisma	Chenopodiaceae	annual herb	1B.2	S2	G3G4
Astragalus pycnostachyus var. lanosissimus	Ventura marsh milk-vetch	Fabaceae	perennial herb	1B.1	S1	G2T1
Astragalus tener var. titi	coastal dunes milk-vetch	Fabaceae	annual herb	1B.1	S1	G2T1
Atriplex coulteri	Coulter's saltbush	Chenopodiaceae	perennial herb	1B.2	S1S2	G3
Atriplex pacifica	South Coast saltscale	Chenopodiaceae	annual herb	1B.2	S2	G4
Atriplex parishii	Parish's brittle-scale	Chenopodiaceae	annual herb	1B.1	S1	G1G2
Atriplex serenana var. davidsonii	Davidson's saltscale	Chenopodiaceae	annual herb	1B.2	S1	G5T1
Calochortus catalinae	Catalina mariposa lily	Liliaceae	perennial bulbiferous herb	4.2	S4	G4
Calystegia peirsonii	Peirson's morning-glory	Convolvulaceae	perennial rhizomatous herb	4.2	S4	G4
Camissoniopsis lewisii	Lewis' evening-primrose	Onagraceae	annual herb	3	S4	G4
Centromadia parryi ssp. australis	southern tarplant	Asteraceae	annual herb	1B.1	S2	G3T2
Chaenactis glabruscula var. orcuttiana	Orcutt's pincushion	Asteraceae	annual herb	1B.1	S1	G5T1T2
Chenopodium littoreum	coastal goosefoot	Chenopodiaceae	annual herb	1B.2	S2	G2
Chorizanthe parryi var. fernandina	San Fernando Valley spineflower	Polygonaceae	annual herb	1B.1	S1	G2T1
Cistanthe maritima	seaside cistanthe	Montiaceae	annual herb	4.2	S3	G3G4
Convolvulus simulans	small-flowered morning-glory	Convolvulaceae	annual herb	4.2	S4	G4
Crossosoma californicum	Catalina crossosoma	Crossosomataceae	perennial deciduous shrub	1B.2	S3	G3
Deinandra paniculata	paniculate tarplant	Asteraceae	annual herb	4.2	S4	G4
Dichondra occidentalis	western dichondra	Convolvulaceae	perennial rhizomatous herb	4.2	S3S4	G3G4
Dithyrea maritima	beach spectaclepod	Brassicaceae	perennial rhizomatous herb	1B.1	S1	G1

Dudleya multicaulis	many-stemmed dudleya	Crassulaceae	perennial herb	1B.2	S2	G2
Dudleya virens ssp. insularis	island green dudleya	Crassulaceae	perennial herb	1B.2	S3	G3?T3
Eryngium aristulatum var. parishii	San Diego button-celery	Apiaceae	annual / perennial herb	1B.1	S1	G5T1
Erysimum insulare	island wallflower	Brassicaceae	perennial herb	1B.3	S3	G3
Erysimum suffrutescens	suffrutescent wallflower	Brassicaceae	perennial herb	4.2	S3	G3
Hordeum intercedens	vernal barley	Poaceae	annual herb	3.2	S3S4	G3G4
Horkelia cuneata var. puberula	mesa horkelia	Rosaceae	perennial herb	1B.1	S1	G4T1
Juncus acutus ssp. leopoldii	southwestern spiny rush	Juncaceae	perennial rhizomatous herb	4.2	S4	G5T5
Lasthenia glabrata ssp. coulteri	Coulter's goldfields	Asteraceae	annual herb	1B.1	S2	G4T2
Leptosyne maritima	sea dahlia	Asteraceae	perennial herb	2B.2	S1	G2
Lycium brevipes var. hassei	Santa Catalina Island desert-thorn	Solanaceae	perennial deciduous shrub	3.1	S1	G5T1Q
Lycium californicum	California box-thorn	Solanaceae	perennial shrub	4.2	S4	G4
Nama stenocarpa	mud nama	Boraginaceae	annual / perennial herb	2B.2	S1S2	G4G5
Navarretia fossalis	spreading navarretia	Polemoniaceae	annual herb	1B.1	S2	G2
Navarretia prostrata	prostrate vernal pool navarretia	Polemoniaceae	annual herb	1B.1	S2	G2
Nemacaulis denudata var. denudata	coast woolly-heads	Polygonaceae	annual herb	1B.2	S2	G3G4T2
Orcuttia californica	California Orcutt grass	Poaceae	annual herb	1B.1	S1	G1
Pentachaeta lyonii	Lyon's pentachaeta	Asteraceae	annual herb	1B.1	S1	G1
Phacelia hubbyi	Hubby's phacelia	Boraginaceae	annual herb	4.2	S4	G4
Phacelia ramosissima var. austrolitoralis	south coast branching phacelia	Boraginaceae	perennial herb	3.2	S3	G5?T3
Phacelia stellaris	Brand's star phacelia	Boraginaceae	annual herb	1B.1	S1	G1
Potentilla multijuga	Ballona cinquefoil	Rosaceae	perennial herb	1A	SX	GX
Suaeda esteroa	estuary seablite	Chenopodiaceae	perennial herb	1B.2	S2	G3
Suaeda taxifolia	woolly seablite	Chenopodiaceae	perennial evergreen shrub	4.2	S4	G
Symphyotrichum defoliatum	San Bernardino aster	Asteraceae	perennial rhizomatous herb	1B.2	S2	G2

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Scientific Name	Common Name	Family	Lifeform	Rare Plant Rank	State Rank	Global Rank
Abronia villosa var. aurita	chaparral sand-verbena	Nyctaginaceae	annual herb	1B.1	S2	G5T2T3
Atriplex coulteri	Coulter's saltbush	Chenopodiaceae	perennial herb	1B.2	S1S2	G3
Atriplex parishii	Parish's brittlescale	Chenopodiaceae	annual herb	1B.1	S1	G1G2
Atriplex serenana var. davidsonii	Davidson's saltscale	Chenopodiaceae	annual herb	1B.2	S1	G5T1
Berberis nevinii	Nevin's barberry	Berberidaceae	perennial evergreen shrub	1B.1	S1	G1
California macrophylla	round-leaved filaree	Geraniaceae	annual herb	1B.2	S3?	G3?
Calochortus catalinae	Catalina mariposa lily	Liliaceae	perennial bulbiferous herb	4.2	S4	G4
Calochortus plummerae	Plummer's mariposa lily	Liliaceae	perennial bulbiferous herb	4.2	S4	G4
Calochortus weedii var. intermedius	intermediate mariposa lily	Liliaceae	perennial bulbiferous herb	1B.2	S2	G3G4T2
Calystegia felix	lucky morning-glory	Convolvulaceae	annual rhizomatous herb	3.1	SH	GHQ
Camissoniopsis lewisii	Lewis' evening-primrose	Onagraceae	annual herb	3	S4	G4
Centromadia parryi ssp. australis	southern tarplant	Asteraceae	annual herb	1B.1	S2	G3T2
Chloropyron maritimum ssp. maritimum	salt marsh bird's-beak	Orobanchaceae	annual herb (hemiparasitic)	1B.2	S1	G4?T1
Clinopodium mimuloides	monkey-flower savory	Lamiaceae	perennial herb	4.2	S3	G3
Convolvulus simulans	small-flowered morning-glory	Convolvulaceae	annual herb	4.2	S4	G4
Cuscuta obtusiflora var. glandulosa	Peruvian dodder	Convolvulaceae	annual vine (parasitic)	2B.2	SH	G5T4T5
Dudleya multicaulis	many-stemmed dudleya	Crassulaceae	perennial herb	1B.2	S2	G2
Helianthus nuttallii ssp. parishii	Los Angeles sunflower	Asteraceae	perennial rhizomatous herb	1A	SH	G5TH
Hordeum intercedens	vernal barley	Poaceae	annual herb	3.2	S3S4	G3G4
Horkelia cuneata var. puberula	mesa horkelia	Rosaceae	perennial herb	1B.1	S1	G4T1
Juglans californica	Southern California black walnut	Juglandaceae	perennial deciduous tree	4.2	S3	G3

Lasthenia glabrata ssp. coulteri	Coulter's goldfields	Asteraceae	annual herb	1B.1	S2	G4T2
Lepidium virginicum var. robinsonii	Robinson's pepper-grass	Brassicaceae	annual herb	4.3	S3	G5T3
Navarretia prostrata	prostrate vernal pool navarretia	Polemoniaceae	annual herb	1B.1	S2	G2
Nemacaulis denudata var. denudata	coast woolly-heads	Polygonaceae	annual herb	1B.2	S2	G3G4T2
Orcuttia californica	California Orcutt grass	Poaceae	annual herb	1B.1	S1	G1
Pentachaeta lyonii	Lyon's pentachaeta	Asteraceae	annual herb	1B.1	S1	G1
Phacelia hubbii	Hubbey's phacelia	Boraginaceae	annual herb	4.2	S4	G4
Phacelia ramosissima var. australitoralis	south coast branching phacelia	Boraginaceae	perennial herb	3.2	S3	G5?T3
Phacelia stellaris	Brand's star phacelia	Boraginaceae	annual herb	1B.1	S1	G1
Pseudognaphalium leucocephalum	white rabbit-tobacco	Asteraceae	perennial herb	2B.2	S2	G4
Quercus engelmannii	Engelmann oak	Fagaceae	perennial deciduous tree	4.2	S3	G3
Ribes divaricatum var. parishii	Parish's gooseberry	Grossulariaceae	perennial deciduous shrub	1A	SH	G4TH
Scutellaria bolanderi ssp. austromontana	southern mountains skullcap	Lamiaceae	perennial rhizomatous herb	1B.2	S3	G4T3
Sidalcea neomexicana	salt spring checkerbloom	Malvaceae	perennial herb	2B.2	S2	G4
Suaeda esteroa	estuary seablite	Chenopodiaceae	perennial herb	1B.2	S2	G3
Symphyotrichum defoliatum	San Bernardino aster	Asteraceae	perennial rhizomatous herb	1B.2	S2	G2
Symphyotrichum greatae	Greata's aster	Asteraceae	perennial rhizomatous herb	1B.3	S2	G2

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Scientific Name	Common Name	Family	Lifeform	Rare Plant Rank	State Rank	Global Rank
Arenaria paludicola	marsh sandwort	Caryophyllaceae	perennial stoloniferous herb	1B.1	S1	G1
Astragalus brauntonii	Braunton's milk-vetch	Fabaceae	perennial herb	1B.1	S2	G2
Astragalus pycnostachyus var. lanosissimus	Ventura marsh milk-vetch	Fabaceae	perennial herb	1B.1	S1	G2T1
Atriplex serenana var. davidsonii	Davidson's saltscale	Chenopodiaceae	annual herb	1B.2	S1	G5T1
Calochortus catalinae	Catalina mariposa lily	Liliaceae	perennial bulbiferous herb	4.2	S4	G4
Calochortus plummerae	Plummer's mariposa lily	Liliaceae	perennial bulbiferous herb	4.2	S4	G4
Calystegia felix	lucky morning-glory	Convolvulaceae	annual rhizomatous herb	3.1	SH	GHQ
Camissoniopsis lewisii	Lewis' evening-primrose	Onagraceae	annual herb	3	S4	G4
Centromadia parryi ssp. australis	southern tarplant	Asteraceae	annual herb	1B.1	S2	G3T2
Convolvulus simulans	small-flowered morning-glory	Convolvulaceae	annual herb	4.2	S4	G4
Dudleya multicaulis	many-stemmed dudleya	Crassulaceae	perennial herb	1B.2	S2	G2
Helianthus nuttallii ssp. parishii	Los Angeles sunflower	Asteraceae	perennial rhizomatous herb	1A	SH	G5TH
Horkelia cuneata var. puberula	mesa horkelia	Rosaceae	perennial herb	1B.1	S1	G4T1
Juglans californica	Southern California black walnut	Juglandaceae	perennial deciduous tree	4.2	S3	G3
Nasturtium gambelii	Gambel's water cress	Brassicaceae	perennial rhizomatous herb	1B.1	S1	G1
Phacelia hubbyi	Hubby's phacelia	Boraginaceae	annual herb	4.2	S4	G4
Pseudognaphalium leucocephalum	white rabbit-tobacco	Asteraceae	perennial herb	2B.2	S2	G4
Symphyotrichum defoliatum	San Bernardino aster	Asteraceae	perennial rhizomatous herb	1B.2	S2	G2

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CHAPTER 11

Responses to Comments

The comment letters received during the public review period for the Draft PEIR are included in Chapter 9. In this Chapter 10, the Water Replenishment District (WRD) provides individual responses to the bracketed comments in each letter. In some instances, in response to the comment, WRD has made additions or deletions to the text of Draft EIR; additions are included as underlined text and deletions as ~~stricken text~~.

Letter 1: County of Los Angeles Fire Department

Comment LACFD-1

The Los Angeles County Fire Department (LACFD) Planning Division has no comments at this time.

Response LACFD-1

The comment is noted for the record.

Comment LACFD-2

The comment states that this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.

Response LACFD-2

The project will comply with all applicable local ordinances and codes as required.

Comment LACFD-3

The comment states that disruptions to water service shall be coordinated with the County of Los Angeles Fire Department and alternate water sources shall be provided for fire protection during such disruptions.

Response LACFD-3

Construction of the proposed project would require coordination with emergency responders such as the LACFD, as well as with the Los Angeles County Sheriff's Department and the California Highway Patrol, as part of the Traffic Control/Traffic Management Plan required per Mitigation Measure TR-1 (Draft PEIR page 4.12-17). Any disruptions to water service will be discussed at this time in coordination with the LACFD.

Comment LACFD-4

The comment states that three sets of alternate route (detour) plans with a tentative schedule of planned closures should be provided prior to the beginning of construction. The comment also states that complete architectural/structural plans are not necessary.

Response LACFD-4

The Draft PEIR states in section 4.12, Traffic and Transportation, on page 4.12-20, that construction of the proposed project could delay emergency vehicle response times or otherwise disrupt delivery of emergency services associated with the LACFD. Mitigation Measure TR-1 would require implementation of a Traffic Control/Traffic Management Plan that would require coordination with emergency service providers. Any alternate route (detour) plans would be developed in accordance with the Traffic Control/Traffic Management Plan and would be provided to appropriate local jurisdictions, including the LACFD, prior to construction.

Comment LACFD-5

The comment states that until actual construction is proposed the project will not have a significant impact to the Fire Department's Land Development Unit.

Response LACFD-5

The comment is noted for the record.

Comment LACFD-6

The comment states that the emphasis for the County of Los Angeles Fire Department's Land Development Unit is on the availability of sufficient water supplies for firefighting operations and local/regional access issues. The comment states that they are also responsible for review of all projects within contract cities, as well as for all County facilities located within non-contract cities. They may also comment on conditions which may create a potentially significant impact to the environment.

Response LACFD-6

WRD and partner agencies responsible for implementing individual Groundwater Basins Master Plan (GBMP) projects will consult with the LACFD's Land Use Division for review of such future projects.

Comment LACFD-7

The comment states that future Construction activities associated with all projects proposed under Concepts A and B shall comply with all applicable codes and regulations.

Response LACFD-7

WRD and partner agencies responsible for implementing individual GBMP projects will comply with all applicable codes and regulations as required.

Comment LACFD-8

The comment states that the LACFD's Forestry Division will evaluate each proposed project during the approval process and will identify any potential impacts and recommend mitigation if necessary.

Response LACFD-8

The comment is noted for the record. WRD and partner agencies will consult with the LACFD's Forestry Division on future individual GBMP projects as required.

Comment LACFD-9

The Health Hazardous Materials Division has no comment at this time.

Response LACFD-9

The comment is noted for the record.

Letter 2: State Water Resources Control Board**Comment SWRCB-1**

The comment states that prior to a Clean Water State Revolving Fund (CWSRF) financing commitment, projects are subject to provisions of the Federal Endangered Species Act and must obtain Section 7 clearance for any potential effects to special status species.

Response SWRCB-1

The comment is noted for the record. All implementing agencies will coordinate with the appropriate agencies as individual GBMP projects are implemented, to ensure those projects comply with the Endangered Species Act. (See Mitigation Measure BIO-3.)

Comment SWRCB-2

The comment states that if the project is to be financed by the CWSRF, the District will need to identify whether the Project will involve any direct effects from construction activities, or indirect effects such as growth inducement, that may affect federally listed threatened, endangered, or candidate species that are known, or have a potential to occur in the Project site, in the surrounding areas, or in the service area, and to identify applicable conservation measures to reduce such effects.

Response SWRCB-2

The comment is noted for the record. The Draft PEIR includes an assessment of potential biological resources impacts that would result from the proposed project (see Chapter 4.3). All potential impacts to biological resources would be reduced to a less than significant level with the application of mitigation measures. The Draft PEIR also includes an analysis of potential growth-inducing impacts of the proposed project, found in Chapter 6. All implementing agencies will coordinate with the appropriate agencies as individual GBMP projects are implemented, to ensure those projects comply with the Endangered Species Act. (See Mitigation Measure BIO-3.)

Comment SWRCB-3

The comment states that CWSRF projects must comply with federal laws pertaining to cultural resources, specifically Section 106 of the National Historic Preservation Act. The District must retain a consultant that meets the Secretary of the Interior's Professional Qualification Standards to prepare a Section 106 compliance report.

Response SWRCB-3

The comment is noted for the record. The Draft PEIR includes an assessment of potential cultural resources impacts that would result from the proposed project (see Chapter 4.4). All potential impacts to cultural resources would be reduced to a less than significant level with the application of mitigation measures. As discussed at p. 4.4-25 of the Draft EIR, as GBMP projects are implemented, additional CEQA review will be conducted to assess an individual project's potential impacts to cultural resources.

Comment SWRCB-4

The comment states that the District will need to identify the Area of Potential Effects (APE), including construction and staging areas, and the depth of any excavation. The records search request should extend to a ½-mile beyond Project APE.

Response SWRCB-4

The comment is noted for the record. The APE will be identified in funding applications for any specific GBMP projects that seek CWSRF financing. If individual projects have components that require ground disturbance, the implementing agency will be required to conduct a cultural resources records search and a field survey where deemed appropriate pursuant to Mitigation Measure CUL-1a.

Comment SWRCB-5

The comment states that there should be compliance with the Federal Clean Air Act. Studies that may have been done for the Project should be provided as well as a summary of the estimated emissions that are expected. If the emissions are above the federal de minimis levels, quantitatively indicate how the proposed capacity increase was calculated using population projections.

Response SWRCB-5

The comment is noted for the record. The Federal Clean Air Act is mentioned in the Draft PEIR in Chapter 4.2 Air Quality, subsection 4.2.2, Environmental Setting, and subsection 4.2.3, Regulatory Framework, which describes the applicable federal policies and objectives related to the Federal Clean Air Act (CAA). The SCAQMD implements programs and regulations required by the Federal CAA. The Draft PEIR analyzes the Project's compliance with the SCAQMD air quality standards. Further, each future GBMP project would be subject to environmental review by implementing agencies on a case-by-case basis and would include a determination of whether construction-related emission would exceed SCAQMD's applicable significance thresholds.

Comment SWRCB-6

The comment states that compliance with the Coastal Zone Management Act is needed. The comment also states that it needs to be identified whether the Project is within a coastal zone and the status of any coordination with the California Coastal Commission.

Response SWRCB-6

The comment is noted for the record. The Draft PEIR describes the coastal zone as encompassing a margin of land at the western edge of the WRD service area (Draft PEIR, page 4.10-1). According to the Draft PEIR on page 4.10-16, the W1 and W3 projects may be located within the coastal zone depending on the pipeline alignment route. Specifically, the pipeline associated with W1 would be constructed in a coastal zone designated by the California Coastal Commission (CCC) if the alignment is installed within the Vista Del Mar right-of-way. According to the Draft PEIR, if final design determines that the pipeline would be installed within the Vista Del Mar right-of-way and therefore in the coastal zone, a Coastal Development Permit would need to be prepared and submitted to the CCC.

Comment SWRCB-7

The comment states that any portion of the proposed Project area that should be evaluated for wetlands or United States waters delineation by the United States Army Corps of Engineers (USACE), or required a permit from the USACE should be identified. The status of coordination with USACE should also be identified.

Response SWRCB-7

The comment is noted for the record. The jurisdictional delineation of wetlands and other waters will be identified when the application for funding of specific GBMP projects is submitted, after preliminary design is complete. Pursuant to Mitigation Measure BIO-10, GBMP projects would be required to conduct formal wetland delineation in areas where potential jurisdictional resources may be affected by the project.

Comment SWRCB-8

The comment states that it should be identified whether the Project will result in the conversion of farmland (Prime, Unique, or Local Statewide Importance). The status of farmland in the Project area needs to be stated and it needs to be determined if this area is under a Williamson Act Contract.

Response SWRCB-8

The Draft PEIR states that none of the GBMP project areas are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and therefore would not convert any land to non-agricultural use (Draft PEIR, page 4-5). Furthermore, the Draft PEIR states on page 4-5 that no land within WRD's service area is under a Williamson Act Contract.

Comment SWRCB-9

The comment states that any birds protected under the Migratory Bird Treaty Act that may be impacted by the Project need to be listed and conservation measures to minimize impacts need to be identified.

Response SWRCB-9

The Migratory Bird Treaty Act (MBTA) is defined in the Biological Resources section on page 4.3-6 of the Draft PEIR. Impact 4.3-5 states that migratory birds are likely to forage in the proposed project areas. Implementation of Mitigation Measures BIO-13 and BIO-14, which state that focused surveys should be performed by a qualified biologist prior to any construction activities that could result in direct or indirect impacts to breeding or nesting birds, would ensure that potential direct and indirect impacts on migrating birds would be reduced to a less than significant level (Draft PEIR, page 4.3-14 to -15).

Comment SWRCB-10

The comment states that it needs to be identified whether or not the Project is in a Flood Management Zone and a copy of the Federal Emergency Management to minimize such impacts should be included.

Response SWRCB-10

The Draft PEIR discusses GBMP project facilities located in flood zones on page 4.8-9. Maps showing FEMA flood hazard areas features in the vicinity of the GBMP projects are provided in Appendix I. Impacts related to flood hazards are discussed on pages 4.8-22 through 4.8-25 of the Draft PEIR.

Comment SWRCB-11

The comment states that it needs to be identified whether or not any Wild and Scenic Rivers would be potentially impacted by the Project and conservation measures to minimize such impacts need to be included.

Response SWRCB-11

There are no Wild and Scenic Rivers managed by the U.S. Forest Service within the proposed project areas, and therefore none would be impacted by the GBMP.

Comment SWRCB-12

The comment requests that an analysis of air quality emission data compiled with CalEEMOD or equivalent air quality emission estimating software be provided.

Response SWRCB-12

The comment is noted for the record. Air quality modeling compiled with CalEEMOD or an equivalent air quality emission estimating software will be done as part of project-level analysis of individual GBMP projects, once preliminary design is complete.

Comment SWRCB-13

The comment states that a Cultural Resources Report consistent with Section 106 requirements be provided.

Response SWRCB-13

The comment is noted for the record. A Cultural Resources Report will be prepared as part of project-level analysis of individual GBMP projects, once preliminary design is complete.

Comment SWRCB-14

The comment requests that a species list, less than one year old, from the California Native Plant Society be provided.

Response SWRCB-14

Three database searches of the CNPS Rare and Endangered Plan Inventory were conducted, covering the USGS quadrangle maps listed on page 4.3-1 of the Draft PEIR. The associated species lists are included at the end of this chapter.

Comment SWRCB-15

The comment states that the following documents should be provided if seeking CWSRF funding: one copy of the draft EIR, the resolution certifying the EIR and a Mitigation Monitoring and Reporting Program (MMRP) making the CEQA findings, all comments received during the review period and the District's response to those comments, the adopted MMRP, and the Notice of Determination filed with the Los Angeles County Clerk and the Governor's Office of Planning and Research, State Clearinghouse. Notices of any hearings or meetings held regarding environmental review of any projects to be funded by the State Water Board would be appreciated.

Response SWRCB-15

The comment is noted for the record. All required documentation will be provided if/when a funding application is submitted. The State Water Resources Control Board will receive notices for all future GBMP projects.

Letter 3: City of South Gate**Comment South Gate-1**

The comment requests that the extension of the proposed spreading basin boundary is identified in the Draft PEIR to enhance stormwater capture opportunity through Concept A of the Los Angeles Forebay Storm Water Aquifer Recharge and Recovery Facility (ARRF), Project C5.

Response South Gate-1

Please refer to response South Gate-6.

Comment South Gate-2

The comment requests a description of the estimated costs, funding sources, and timeline for each of the proposed Project.

Response South Gate-2

Please refer to response South Gate-8.

Comment South Gate-3

The comment requests a more thorough description of the requirements which govern Groundwater Recharge Replenishment Projects, specifically in terms of treatment of stormwater required prior to recharging groundwater basins.

Response South Gate-3

Please refer to response South Gate-11

Comment South Gate-4

The comment states that there are comments pertaining to Environmental Setting, Impacts, and Mitigation Measures.

Response South Gate-4

Please refer to responses South Gate-15 through South Gate-19.

Comment South Gate-5

The comment requests partnering with the City of South Gate to accomplish the goal of incorporating stormwater as a valuable and sustainable water source to be used to recharge the groundwater basins in WRD's service area.

Response South Gate-5

WRD will coordinate with the City of South Gate to incorporate stormwater as a valuable and sustainable groundwater recharge source in areas of the Central Basin that are conducive to groundwater recharge via surface spreading.

Comment South Gate-6

The comment requests to extend the proposed boundary of the spreading basin (Project C5) to the confluence of the Los Angeles River and Rio Hondo Channel in order to maximize the opportunity to capture stormwater. The comment states that the City has prepared a feasibility study of the area to develop a regional stormwater project, Urban Orchard, which would serve as mutual beneficial project to WRD's GBMP.

Response South Gate-6

WRD will coordinate with the City to discuss and consider an extension of the proposed boundary of the spreading basin in Project C5. As explained in Response South Gate-5, WRD will discuss potential partnerships with the City for projects such as Urban Orchards based on the mutual benefits to WRD and replenishment of the Central and West Coast groundwater basins.

Comment South Gate-7

The comment states that there may be opportunity for partnership in the implementation of the Lower Los Angeles River Watershed Management Program (LLAR WMP) and the GBMP. As a participating entity in the LLAR WMP, the City suggests a partnership could serve a multiple benefit solution to surface water and groundwater quality in the region.

Response South Gate-7

Please refer to Response South Gate-5. The goals of the GBMP do not include management of stormwater pollution; however, the GBMP does include stormwater capture projects for purposes of groundwater replenishment. If the City or another participating entity wants to implement a stormwater recharge project that replenishes the producing aquifer for storage credit, then the implementing entity (e.g., the City) would be required to seek approval from the Watermaster

Administrative Body and Storage Panel as a groundwater storage project. WRD would not be able to partner with the City on such projects.

Comment South Gate-8

The comment states that the City requests an evaluation of the estimated costs and funding sources to construct and implement Projects, the annual long-term budgeted funding allocation to operate and maintain Projects, and the timeline for each of the proposed Projects. The comment states that if the WRD is to explore opportunities to partner with local agencies, the cost-sharing/funding program should be clearly identified in the Draft PEIR.

Response South Gate-8

CEQA Guidelines do not require estimated costs or funding sources to be included in any environmental document. Generally speaking the planning horizon for the GBMP is approximately 30 years, and Concept A projects would be expected to be implemented first, followed by Concept B projects.

Comment South Gate-9

The comment states that more landmarks on Figure 2-2 should be identified so that the location of the existing replenishment facilities is clear.

Response South Gate-9

In response to the comment, Figure 2-2 has been modified with additional landmarks.

Comment South Gate-10

The comment states that on page 2-6 the narrative described the West Coast Basin Barrier and Dominguez Gap Barrier systems are shown in Figure 2-1; however, it appears as though the systems are shown in Figure 2-2.

Response South Gate-10

In response to the comment, the Draft PEIR text on page 2-6 has been modified to correct the figure number:

Both barrier systems are shown on **Figure 2-12**.

Comment South Gate-11

The comment states that the Draft PEIR lacks specificity or reference to the requirements that govern the Groundwater Recharge Replenishment Projects (GRRPs). The comment also suggests that clarification to the requirements of utilizing stormwater to recharge groundwater basins proposed in the GBMP should be provided.

Response South Gate-11

As discussed in the Draft PEIR on page 2-7, GRRPs are defined by using recycled water for replenishment. There are no requirements for utilizing storm water in a GRRP. Storm water may be used to satisfy diluent water requirements, but such requirements are unique to each GRRP project. The Draft PEIR addresses the regulatory and legal framework that govern the potential

impact of the GBMP projects on groundwater (p. 4.9-27 to 4.9-31) and the Draft specifically evaluates the potential impact of GBMP projects on groundwater quality (Impact 4.9-1 at p. 4.9-32). No modification to the text of the Draft PEIR is warranted.

Comment South Gate-12

The comment states that on page 3-2 the City is identified in the Central Basin – Montebello Forebay project location, which appears as if this is a technical error. The comment states that the City should instead be identified in the Central Basin – Los Angeles Forebay/River as the City is described in the Los Angeles Forebay Storm Water ARRF (Project C5).

Response South Gate-12

In response to the comment, the Draft PEIR text on page 3-2 is modified to correct the geographic location of cities within each forebay. This technical error is particular to Table 3-1 and no other edits are warranted.

**TABLE 3-1 REVISED
GENERAL GEOGRAPHIC LOCATIONS FOR PROPOSED PROJECTS**

Basin	Cities
West Coast Basin	Los Angeles, El Segundo, Carson, Unincorporated Los Angeles County
Central Basin	Los Angeles, Huntington Park, Vernon, Bell, Cudahy, South Gate, Maywood, Bellflower, Downey, Pico Rivera, Industry, Cerritos, Norwalk, Lakewood, Long Beach Unincorporated Los Angeles County

Comment South Gate-13

The comment states that page 3-9 should be revised to provide the wet season storm flow and average storm flow for both the Los Angeles River and the San Gabriel River so that it is clear what the estimated available capacity of storm water is to be expected.

(The Draft PEIR narrative describes the availability of stormwater that could be captured from the San Gabriel and Los Angeles Rivers; however, the Los Angeles River is described as the average of wet season storm flow while the San Gabriel River is described as the average flow. Furthermore, Page 3-27 describes the capacity of the Montebello Forebay Spreading Grounds, where recharge is typically highest during the wet season; yet, page 3-9 does not specify the wet season storm flow. Revise to provide the wet season storm flow and average storm flow for both rivers so that it is clear what is estimated available capacity is stormwater is to be expected.)

Response South Gate-13

The goal of estimating the available flows from the Los Angeles River was to determine the amount of flow that will be available above the base flow to use for recharge. The base flow allows the river to maintain its designated beneficial uses. The average San Gabriel River flows includes both the wet and dry weather flows that are used for recharge.

Comment South Gate-14

The comment states that Table 3-3 should be revised to include the addition of a column which would indicate the intended destination of the recycled water if it were produced from the Treatment Plants listed.

Response South Gate-14

Including destinations for the recycled water produced in WRD's service area is not the intent of Table 3-3. Proposed treatment plants associated with the GBMP projects are included in the project descriptions in Section 3.5.3 of the Draft PEIR and in Table 3-5.

Comment South Gate-15

The comment states that a thorough review of Section 4.8.2 is recommended. The comment states that the language on page 4.8-10 states an NPDES permit would need to be obtained from LARWQCB; however the NPDES permit needs to be obtained from the SWRCB.

Response South Gate-15

In response to the comment, the Draft PEIR on page 4.8-10 is modified to correct the permitting agency.

An NPDES permit is required for all projects that disturb one or more acre of land. Therefore, the proposed project would require an NPDES permit from the ~~LADWQCB~~ SWRCB.

Comment South Gate-16

The comment states that on page 4.8-14 the language refers to the Construction General Permit coverage requirement as one or more acre of "soil" disturbance; however it should be one or more acre of land disturbance.

Response South Gate-16

In response to the comment, the Draft PEIR on page 4.8-14 is modified to correct the type of disturbance.

Dischargers whose projects disturb one or more acres of ~~soil~~ land, or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the general permit for discharges of storm water associated with construction activity.

Comment South Gate-17

The comment states that references to the Industrial General Permit on page 4.8-15 are incorrect. References to required permit activities are not reflective of Order No. 2014-0057-DWQ.

Response South Gate-17

In response to the comment, the Draft PEIR on page 4.8-15 is modified to correct the reference to the Industrial General Permit.

The current Industrial General Permit (Order No. ~~97-03-DWG, General Permit No. CAS000001~~ 2014-0057-DWQ) was ~~last adopted in April of 1992~~ approved on April 1, 2014, and went into effect on September 1, 2015 and applies to storm water associated with industrial operations, including sewage treatment systems.

~~A new Industrial General Permit has been drafted and subject to public review, and is expected to be adopted in July of 2013. Upon implementation of applicable proposed facilities, this updated permit will likely be in effect.~~ The new Industrial General Permit introduces several relevant changes. Firstly, the permit would require the implementation of all applicable and feasible minimum BMPs in combination with additional facility specific BMPs. The permit also requires that each facility has one staff or external personnel trained as a QISP (qualifying industrial storm water practitioner) to perform certain critical functions in order to ensure compliance. The new General Permit contains two types (annual and instantaneous maximum) numeric action levels (NALs) which serve as water quality thresholds for corrective action. If these are exceeded, agencies would be required to submit an Exceedance Response Action (ERA) report in which they evaluate their BMPs to ensure they meet best available technology (BAT) and best conventional pollutant control technology (BCT) standards. The permit would require dischargers to monitor for all components by which the receiving water body is impaired and requires treatment control BMPs to match design storm standards. The permit would provide an updated qualifying storm event (QSE) definition and also alters sampling protocols to allow a more reasonable time frame to gather initial discharge samples after the first QSE. The permit also would increase required sampling frequencies and do away with group monitoring (SWRCB, ~~2014~~2013).

Comment South Gate-18

The comment states that on page 4.8-15 the discharger – as it is used – is referring to WRD; however, in the context of the MS4 permit, the discharger is the permittees.

Response South Gate-18

The language at the top of page 4.8-16 does not specifically reference WRD as the “discharger.” However, in response to the comment, the Draft PEIR text on page 4.8-16 is modified to clarify the roles of implementing agencies.

The discharger, which would be the applicable municipal permittee based on GBMP project location, would be required to prepare a Monitoring and Reporting Program (MRP), which includes outfall-based storm water monitoring data (where storm water exits the facility), wet and dry weather receiving water monitoring data, outfall-based non-storm water monitoring data and regional studies.

Comment South Gate-19

The comment states that requirements of the Planning and Land Development Program should be referenced in the Los Angeles County MS4 Permit section.

Response South Gate-19

In response to the comment, the Draft PEIR on page 4.8-16 is modified to add regulatory language of the MS-4 permit related to the Planning and Land Development Program.

Each discharger is required to implement a Planning and Land Development Program (Order No. R4-2012-0175) pertaining to MS-4 discharges within the coastal watersheds of Los Angeles County, which requires new projects to:

- Lessen the water quality impacts of development by using smart growth practices such as compact development, directing development towards existing communities via infill or redevelopment, and safeguarding of environmentally sensitive areas.
- Minimize the adverse impacts from storm water runoff on the biological integrity of Natural Drainage Systems and the beneficial uses of water bodies in accordance with requirements under CEQA (Cal. Pub. Resources Code § 21000 et seq.).
- Minimize the percentage of impervious surfaces on land developments by minimizing soil compaction during construction, designing projects to minimize the impervious area footprint, and employing Low Impact Development (LID) design principles to mimic predevelopment hydrology through infiltration, evapotranspiration and rainfall harvest and use.
- Maintain existing riparian buffers and enhance riparian buffers when possible.
- Minimize pollutant loadings from impervious surfaces such as roof tops, parking lots, and roadways through the use of properly designed, technically appropriate BMPs (including Source Control BMPs such as good housekeeping practices), LID Strategies, and Treatment Control BMPs.
- Properly select, design and maintain LID and Hydromodification Control BMPs to address pollutants that are likely to be generated, reduce changes to pre-development hydrology, assure long-term function, and avoid the breeding of vectors²⁵.
- Prioritize the selection of BMPs to remove storm water pollutants, reduce storm water runoff volume, and beneficially use storm water to support an integrated approach to protecting water quality and managing water resources in the following order of preference: (a) On-site infiltration, bioretention and/or rainfall harvest and use. (b) On-site biofiltration, off-site ground water replenishment, and/or off-site retrofit.

Letter 4: State of California Department of Fish and Wildlife

Comment CDFW-1

The comment states that the Department generally concurs with the biological assessment, avoidance and mitigation approaches described in the DPEIR.

Response CDFW-1

The comment is noted for the record.

Comment CDFW-2

The comment states that the DPEIR is lacking a discussion regarding how the GBMP will reduce surface flows of specific drainages from subsequent water diversions and groundwater pumping projects proposed under the GBMP guidelines. The comment states that the following types of information should be referenced in the GBMP as required analysis: historical data for average monthly flows for all effected drainages within the Central Basin and West Coast Basins (CBWCB) both above and below diversion points and extraction wells; a discussion regarding timing and duration of proposed diversions and ground water pumping and any minimum flow requirements for drainages within the CBWCB; a discussion on how the proposed Project will chance the historical average monthly flows below proposed water diversions and from groundwater pumping including calculating the percentage of flow reduction.

Response CDFW-2

The key surface water features in the GBMP project area that are either located adjacent to proposed project facilities or potentially affected by the proposed GBMP facilities are described in the Draft PEIR on page 4.8-4. As described on page 4.8-22 of the Draft PEIR, implementation of the GBMP Project C5 ARRF would divert up to 5,000 AFY of storm water from Reach 2 of the Los Angeles River into spreading basins for groundwater recharge. This would decrease the amount of storm flows reaching downstream portions of Reaches 2 and 1 and the Estuary of the Los Angeles River. However, operation of Project C5 would occur during periods of high flow and would not affect base flows that sustain downstream biological resources. In addition, as described on page 3-20 of the Draft PEIR, implementation of GBMP Project C6 GBOP would divert up to 17,000 AFY of storm water that currently flows to the ocean during large storm events and that could otherwise be captured and recharged at the MFSG. Such recharge would require increased groundwater pumping to create additional storage capacity. Capturing flow during large storm events under Project C6 also would not affect base flows downstream that sustain biological resources.

In addition, the GBMP generally assumes that groundwater replenishment supports and matches pumping such that groundwater levels remain approximately unchanged relative to existing conditions (see Draft PEIR pages 4.9-38 through 4.9-41). Therefore, pumping activities would not result in flow reductions in any drainage.

In response to the comment, text is added to the Draft PEIR on page 4.3-10 regarding the effects of GBMP project operations on biological resources:

Once constructed, all pipelines would be located underground and no operational impacts would occur. All other project construction, with the exception of the proposed satellite AWTF, would occur within existing facilities where operational impacts would be similar to existing conditions. Implementation of Project C5 ARRF would result in the diversion of up to 5,000 AFY from Reach 2 of the Los Angeles River during high flow periods. Downstream of this diversion point, the Los Angeles River is a concrete-lined channel. Thus, no significant impacts to biological resources associated with this diversion would be expected. Also, as documented in Chapter 4.8 Surface Hydrology and Water Quality, these sections of the river are listed on the state 303(d) list for impairment due to metals, nutrients, pathogens, pesticides, organics, sediment toxicity, and trash (see page 4.8-22). Diversion of storm flows from the river would slightly reduce this pollutant loading to the lower reaches, which may provide a benefit to any biological resources. As individual GBMP projects are implemented, the potential for operations to affect flows in any drainage will be identified as part of subsequent environmental analysis once preliminary design is complete. All subsequent environmental review documentation would be sent to CDFW for review and comment. No impacts to biological resources due to operation of the proposed facilities would occur.

Comment CDFW-3

The comment states that the Final PEIR should analyze all diversion points in drainages included in the CBWCB Project area to determine how much water is being removed from the channel system and evaluate the significance of the Project's cumulative impacts to biological resources and watershed health function. The comment states that storm water and groundwater contributions may be important during the dry season and prolonged drought conditions in maintaining flows supporting biological resources.

Response CDFW-3

As stated above in response CDFW-2, the GBMP generally assumes that groundwater replenishment supports and matches pumping such that groundwater levels remain unchanged relative to existing conditions. Therefore, pumping activities would not lower groundwater levels that support/maintain flow in any drainage. As such, there would be no flow reductions in any drainage that supports biological resources. Since there would be no direct project impacts to flow, there would be no potential for the GBMP to contribute to cumulative impacts. As such, this potential impact is not included in the analysis of cumulative impacts. No changes to the PEIR are warranted.

In addition, the GBMP includes two storm water projects, Project C5 and Project C6. Both projects would divert storm water during high flow periods and would not affect dry season or base flows in drainages in the CBWCB project area that support biological resources. Since there would be no direct project impacts to base flows or dry season flows and associated biological resources, there would be no potential for Projects C5 and C6 to contribute to cumulative impacts. As such, this potential impact is not included in the analysis of cumulative impacts. No changes to the PEIR are warranted.

Letter 5: County Sanitation Districts of Los Angeles County

Comment LACSD-1

The comment states that the Sanitation Districts are supportive of the GBMP projects, which should help to develop new markets for recycled water.

Response LACSD-1

The comment is noted for the record.

Comment LACSD-2

The comment states that page 3-19 of Section 3.5.3 states that no additional facilities are needed to produce the 8,000 AFY of advanced treated water for increased injection of recycled water into the Alamitos Barrier Gap. Due to the availability concerns with recycled water from the Long Beach WRP, a connection to the Los Coyotes WRP may be needed to supply Vander Lans.

Response LACSD-2

The primary focus of the GBMP is basin recharge from specific facilities (such as the Vander Lans AWTF), and the overall impact on the groundwater basins of the entire suite of potential recharge projects considered for each scenario. Since the Vander Lans AWTF expansion project is completed and operational, no additional facilities were identified to recharge the Central Basin from Vander Lans as part of the GBMP.

If the source water to Vander Lans, currently from the Long Beach WRP, is reduced or eliminated such that the agreement of providing up to 10,000 afy from the Los Coyotes WRP is realized (per the July 1, 2013 Agreement for Purchase and Sale of Recycled Water between County Sanitation District No.2 of Los Angeles County and Water Replenishment District of Southern California), then the corresponding volume of Los Coyotes WRP recycled water would not be available for other potential projects.

The GBMP projects are not a comprehensive listing of all potential projects for recharging the West Coast and Central Basins. Rather, a sampling of projects that covered the range of flows considered for the modeling analyses were identified as possible options for delivery of the recycled water to the recharge facilities. The actual application of recycled water to any project, whether identified in the GBMP or not, will be subject to flow availability and specific negotiations with recycled water provider by the project proponent at the time the project is advanced.

Comment LACSD-3

The comment states that the source of the recycled water quantity estimates throughout the GBMP is unclear. The comment states that noting that recycled water is subject to availability should be considered.

Response LACSD-3

The recycled water flows from the Sanitation Districts' WRPs were based on flows available during the drafting of the GBMP in 2012. The identification of specific recharge projects from

specific WRPs was intended to illustrate the possible expanded use of the available recycled water (at the time) for basin recharge. The source of recycled water will necessarily depend on the availability of flow and the Sanitation Districts' ability to dedicate flow to projects, based on such availability and other commitments.

Comment LACSD-4

The comment states that recycled water availability at San Jose Creek WRP is limited and it is unlikely that additional volumes of recycled water above GRIP volumes will be available from this plant.

Response LACSD-4

Recognizing that the availability of recycled water from the San Jose Creek WRP may be limited, the recharge projects identified could only be fed from San Jose Creek WRP if major sewer diversions were implemented to deliver more influent flow to SJCWRP. Alternatively, the assumed recharge volumes from San Jose Creek WRP can be met with recycled water produced by other treatment facilities, such as those being considered by Metropolitan Water District of Southern California (MWD) at the Sanitation Districts' Joint Water Pollution Control Plant in Carson (see Comment LACSD-5 below).

Comment LACSD-5

The comment states that Metropolitan Water District (MWD) is contemplating construction of an advanced water treatment plant at the Joint Water Pollution Control Plant to serve locations and projects such as those contemplated in the GBMP. The comment states that it may be beneficial to coordinate efforts with them.

Response LACSD-5

WRD is actively coordinating with MWD on its Reuse Program with the Sanitation Districts that can potentially, as noted in Response LACSD-4 above, provide the recycled water needed for the recharge projects assumed to be served by other WRPs in the GBMP.

Comment LACSD-6

The comment states that the Puente Hills Landfill is closed and no longer accepting waste. The comment suggests updating applicable sections.

Response LACSD-6

In response to the comment, the Draft PEIR text on pages 4.13-6, 4.13-18, and 7-15 have been updated to reflect the closing of the Puente Hills Landfill.

Draft PEIR page 4.13-6

Puente Hills Landfill

~~The Puente Hills Landfill is a Class III landfill located in unincorporated Los Angeles County. The facility is one of the largest landfills in the nation. The landfill first established the use of environmental control systems, such as those designed to protect air quality and groundwater that have now been modeled throughout California and the~~

nation (LACSD 2013). The ~~Puente Hills Landfill~~ disposes of approximately 2,638,000 tons of waste from the cities of Los Angeles (8%), Carson (6%), Industry (4%), “Others” (66%) and Unincorporated Los Angeles County (16%) (County of Los Angeles, 2011). The current capacity of the landfill is 26.4 million cubic yards (LACSD, 2012).

Puente Hills Material Recovery Facility

The Puente Hills Material Recovery Facility (MRF) is located in unincorporated Los Angeles County, next to the now closed Puente Hills Landfill. The Puente Hills MRF is owned and operated by the Sanitation Districts. The purpose of the Puente Hills MRF is to provide waste diversion and publicly-owned transfer capacity for Los Angeles County. The facility is permitted to accept 4,400 tons per day and 24,000 tons per week of municipal solid waste. The receipt of liquid or hazardous waste is not allowed.

Draft PEIR page 4.13-18

In addition, the ~~Puente Hills Landfill~~ Puente Hills MRF would have sufficient capacity to receive solid waste generated during construction of the proposed project. The ~~Puente Hills Landfill~~ Puente Hills MRF is located outside the northeastern boundary of WRD’s service area near the SJCWRP and accommodates all forms of solid waste. The current capacity of the landfill is 26.4 million cubic yards (LACSD, 2012). With implementation of UTIL-1 and UTIL-2, impacts to landfill capacity would be less than significant.

The ~~Puente Hills Landfill~~ Puente Hills MRF is a Class III landfill that would be available to serve the proposed project.

Draft PEIR page 7-15

In addition, local landfills such as ~~Puente Hills Landfill~~ Puente Hills MRF have sufficient capacity to receive construction and operational solid wastes and serve the project over its lifetime.

Draft PEIR Page 4.13-23

~~Sanitation Districts of Los Angeles County, Puente Hills Landfill Annual Report, November 2012.~~

Personal Communication. Sanitation Districts of Los Angeles County staff member. March 10, 2016.

Comment LACSD-7

The comment states that on pages 4.1-7 and 4.12-16 the Draft PEIR states that proposed treatment facilities would be located adjacent to existing treatment plants, however, there may not be space at Sanitation District’s facilities for additional WRD treatment facilities. The comment states the GRIP AWTP is now located in the City of Pico Rivera, off-site from the San Jose Creek WRP and clarifying this in the text should be considered.

Response LACSD-7

In response to the comment, the Draft PEIR text on pages 4.1-7 and 4.12-16 has been updated to reflect the location on or near existing treatment facilities, of proposed treatment facilities.

Draft PEIR page 3-19**Groundwater Improvement Reliability Project (Project C0)**

The Draft GBMP includes GRIP, which has already been evaluated under CEQA but not yet built. The cumulative environmental effects of operating GRIP together with other GBMP project are evaluated in this PEIR. As the CEQA Lead Agency, WRD certified the Final Environmental Impact Report (EIR) for GRIP on June 18, 2015. A technical analysis conducted for the GRIP project is also included in this PEIR as **Appendix C**. As described in the Final EIR, GRIP will replace the current use of 21,000 AFY of imported water at the MFSG with a combination of both tertiary-treated and AWT recycled water for groundwater replenishment. Approximately 11,000 AFY of tertiary-treated recycled water produced by LACSD's San Jose Creek WRP will be conveyed to the MFSG for recharge via an existing underground outfall pipeline. In addition, WRD will construct an AWT plant to produce 10,000 AFY of AWT recycled water for recharge at the MFSG. This AWT recycled water will be conveyed from the new Advanced Water Treatment Facility in the City of Pico Rivera to the MFSG for recharge using the existing underground outfall pipeline referenced above.

Draft PEIR page 4.1-7

With the exception of the Satellite AWTF under Project C10, proposed treatment facilities would be located at or adjacent to existing treatment plants, including ECLWRF, TIWRP, JWPCP, SJCWRP, and LCWRP. Agencies operating existing treatment plants will evaluate specific requests for proposed on-site treatment facilities by WRD and other partner agencies.

Draft PEIR page 4.12-16

Treatment plant upgrades would occur entirely within the boundaries of existing facilities or on adjacent lands and thus would not directly impact roadways or require lane closures. Agencies operating existing treatment plants will evaluate specific requests for proposed on-site treatment facility upgrades by WRD and other partner agencies.

Comment LACSD-8

The comment requests an explanation of how the No Project Alternative includes increases in recharge in the Montebello Forebay Spreading Ground from storm water or recycled water.

Response LACSD-8

As explained on page 7-8 of the Draft PEIR, one of WRD's primary responsibilities is to replenish the West Coast Basin and Central Basin sufficiently so pumpers can extract groundwater up to their water rights in the West Coast Basin and up to the APA in the Central

Basin. The No Project Alternative, which is discussed on pages 7-8 and 7-9 of the Draft PEIR, includes implementation of some GBMP projects in order for WRD to meet replenishment obligations. The No Project Alternative would include increasing replenishment at the MFSG by approximately 10,000 AFY to support pumping at the APA, up to 217,367 (Draft PEIR page 7-9). This would be achieved with either storm water capture or recycled water from the San Jose Creek WRP and/or Los Coyotes WRP.

Letter 6: Department of Transportation

Comment Caltrans-1

The comment states the impacts to the Route 105 freeway and Metro Green Line need to be addressed as both are major transportation arterials that below grade level and located within the Central Basin.

Response Caltrans-1

The Draft PEIR addresses potential impacts to the 105 Freeway on page 4.9-40. The analysis also includes impacts to subsurface infrastructure and utilities, which would include the Metro Green Line in areas where it is below ground or below grade. In the vicinity of Caltrans' dewatering facilities along the 105 Freeway and east of the Los Angeles River, the Metro Green Line is above ground.

The Draft PEIR acknowledges that operation of the GBMP projects in the Central Basin may increase groundwater levels in the shallow aquifer due to increased recharge from the MFSG or other proposed recharge and injection locations. As a result, "subsurface structures and utilities could become inundated, potentially compromising their functions. Implementation of **Mitigation Measures GW-L1** and **GW-L2** would ensure that WRD monitors groundwater levels and implements measures to ensure groundwater levels do not impact subsurface structures."

Comment Caltrans-2

The comment states that Metro needs to be notified of this DEIR.

Response Caltrans-2

As described in Response Caltrans-1, Mitigation Measures GW-L1 and GW-L2 would ensure significant impacts to subsurface structures and utilities would not occur, including impacts to Metro facilities. As appropriate, Metro will be notified of all subsequent CEQA documentation for individual GBMP projects that may affect Metro facilities.

Comment Caltrans-3

The comment requests identification of the treatment and filtration process that will be implemented for the additional extracted groundwater in the DEIR.

Response Caltrans-3

Treatment of extracted groundwater will be determined by individual groundwater pumpers, similar to existing conditions. Treatment and filtration processes are not within WRD's purview or part of the GBMP, and as such are not included in this PEIR.

Comment Caltrans-4

The comment requests identification of how the GBMP projects interface with the Rio Hondo/San Gabriel River Spreading Grounds Interconnection Pipeline Project and the Whittier Narrows Conservation Pool Increase Project.

Response Caltrans-4

The Interconnection Pipeline Project, which was completed in 2012, and the Conservation Pool Project which is anticipated to be completed in 2018 allow for greater operational flexibility and increased stormwater capture in the spreading grounds. Both of these projects will aid in meeting the increased MFSG replenishment identified in the GBMP. Specifically, it is estimated that the Interconnection Pipeline Project will allow for 5,700 acre-feet per year of recycled water replenishment and 1,300 acre-feet per year of storm water capture. It is estimated that the Conservation Pool Project will allow for 1,100 acre-feet per year of storm water capture. These two projects will help ensure the baseline assumptions used in the GBMP modeling are met throughout the modeling period.

Comment Caltrans-5

The comment requests that a current status of the approval/analysis for the Conservation Pool Increase Project be provided and address this condition and its potential impacts to the proposed project area.

Response Caltrans-5

WRD is currently working with the USACE to finalize the Feasibility Cost-Share Agreement (FCSA). Upon approval of the FCSA, WRD and the USACE will initiate the development of the Feasibility Study.

Comment Caltrans-6

The comments requests that the outcome of the projected increase in pumping and treatment activity for Route 105 in result of the DEIR proposal be addressed.

Response Caltrans-6

As discussed in the Draft PEIR on page 4.9-40, results of the GBMP modeling show that groundwater levels may increase by five to 10 feet in the vicinity of the 105 Freeway under conditions where groundwater replenishment exceeds pumping, such that available storage space in the Central Basin is filled. This increase in groundwater levels is similar to fluctuations in natural groundwater levels during wet years without storage. Therefore, water levels would not increase beyond historical fluctuations of the Montebello Forebay. Generally the GBMP assumes that groundwater replenishment would be matched by equal rates of pumping such that groundwater levels would not increase; it is not expected that full basin storage would occur with regularity; thus the modeled five-to-ten foot increase near Caltrans' 105 Freeway dewatering facilities also would not occur with regularity. The effects would be experienced as fluctuations in groundwater levels, similar to those experienced under normal historical fluctuations. The analysis provided in the Draft PEIR for the GBMP is at a planning level for both the Central Basin and West Coast Basin and does not include an assessment of increased pumping and treatment for the Caltrans' 15 Freeway dewatering facility. Rather, Mitigation Measures GW-L1

and GW-L2 would ensure that WRD monitors groundwater levels and implements measures to ensure groundwater levels do not impact subsurface structures.

Comment Caltrans-7

The comment states that the impact of any “federal waters” on the proposed project be identified.

Response Caltrans-7

Impacts of the proposed project to jurisdictional waters of the US are identified in the Draft PEIR in Chapter 4.3 Biological Resources, on pages 4.3-13 and 4.3-14.

Comment Caltrans-8

The comment asks if in Figure 3, it is possible to infiltrate the additional water into the subsurface.

Response Caltrans-8

There is no Figure 3 in the Draft PEIR. WRD assumes the comment is referencing Figure 3-3 on page 3-8. Assuming "subsurface" in the comment means the perched zone, no additional water will infiltrate into the subsurface. The GBMP results in recharge of water into the deep producing aquifers. No change to the figure is warranted.

Comment Caltrans-9

The comment asks in Figure 3, how much of this additional water will replenish beneficial aquifers.

Response Caltrans-9

There is no Figure 3 in the Draft PEIR. WRD assumes the comment is referencing Figure 3-3 on page 3-8. All GBMP projects result in recharge of water into the deep producing aquifers or “beneficial aquifers.”

Comment Caltrans-10

The comment asks if Figure 3 can identify/describe replenishment as is related to this EIR.

Response Caltrans-10

Please see Response Caltrans-9.

Comment Caltrans-11

The comment states that the PEIR should assess the potential for encountering contaminated soils, contaminated perched water, and hazardous substances, as the groundwater rises in the Central Basin and West Coast Basin due to the replenish of groundwater. The comment states that the PEIR should also assess the potential migration of these contaminations, not just the local construction sites.

Response Caltrans-11

Chapter 4.9 Groundwater in the Draft PEIR discusses the environmental setting related to contaminated soil and groundwater in the Central Basin and West Coast Basin on pages 4.9-12

through 4.9-19, with graphic depictions of environmental release sites and leaking underground storage tanks in Figures 4.9-6 and 4.9-7. The analysis related to groundwater quality as a result of soil and groundwater contamination is presented in the Draft PEIR on pages 4.9-32 through 4.9-37. Please also refer to Response Caltrans-17.

Comment Caltrans-12

The comment states that the PEIR should assess the potential impacts on the underground structures of high-rise buildings, as a result of the groundwater rises in the Central Basin and West Coast Basin due to the replenish of groundwater.

Response Caltrans-12

Potential impacts to underground structures are addressed on pages 4.9-38 through 4.9-41 of the Draft PEIR, specifically Impact 4.9-2.

Comment Caltrans-13

The comment states that the PEIR fails to address the potential impacts on the highways, subways, and public transportation facilities, as a result of the groundwater rises in the Central Basin and west Coast Basin due to the replenishment of groundwater, and limit the assessment only to traffic impacts.

Response Caltrans-13

The impacts of shallow groundwater on infrastructure and utilities are addressed in Chapter 4.9 Groundwater rather than Chapter 12 Traffic and Transportation. The Draft PEIR addresses potential impacts to the 105 Freeway and, in general, subsurface infrastructure and utilities on pages 4.9-38 through 4.9-41. The Draft PEIR acknowledges that operation of the GBMP projects in the Central Basin may increase groundwater levels in the shallow aquifer due to increased recharge from the MFSG or other proposed recharge and injection locations. As a result, “subsurface structures and utilities could become inundated, potentially compromising their functions. Implementation of **Mitigation Measures GW-L1** and **GW-L2** would ensure that WRD monitors groundwater levels and implements measures to ensure groundwater levels do not impact subsurface structures.”

Comment Caltrans-14

The comment requests that the ascii files used with the USGS mudflow software be made available.

Response Caltrans-14

WRD will provide the ascii files to Caltrans under separate cover. Please contact Jason Weeks at 562-275-4253 or jweeks@wrdd.org.

Comment Caltrans-15

The comment requests to identify with specificity which measures are to be used in determining whether an increase in groundwater elevation will be considered “successful.”

Response Caltrans-15

Various model scenarios were evaluated on a long-term basis to understand the effect of additional recharge and extraction on groundwater levels. Modeling results indicate that, over the 40-year simulation period, groundwater levels are maintained relative to historical levels within a range of acceptable variability. Continuous monitoring and evaluation of actual recharge and pumping (locations and quantities of pumping) is needed to ensure the long-term water balance of the basins.

Comment Caltrans-16

The comment asks if the groundwater will increase across the basins uniformly or if some areas will increase in elevation before others. The comment requests that if some areas will increase in elevation before others, that those areas be identified.

Response Caltrans-16

Groundwater increases across the basin will not be uniform. They vary both spatially and temporally. Elevation increases are expected to be the greatest in areas in and around the points of recharge (basins and wells); however, pumping helps to balance the groundwater levels. As an example, attached figure shows the changes in groundwater elevations for various locations under one of the GBMP modeling scenarios. For more details of various model combination runs/scenarios, please refer to the GBMP report.

Comment Caltrans-17

The comment asks if it is possible for the increase in groundwater elevation to mobilize contaminants in soil.

Response Caltrans-17

On a long-term simulation basis (i.e., for the period from 2010 through 2050), the effect of recharge and pumping on groundwater elevations under various combination scenarios were evaluated. Generally, the groundwater elevation fluctuations were similar to the historical levels, which are not expected to create any (new) conditions to mobilize contaminants in soils. In the LA Forebay and West Coast Basin, recharge is anticipated to occur using injection wells which are deep and are not expected to result in rise in groundwater elevations that could mobilize contaminants in surface soils. The impact of this type of recharge is discussed in PEIR under Impact 4.9-1. Also, it is recommended that more precise/localized modeling be conducted for individual projects once designed to identify site-specific potential for mobilizing contaminants.

Comment Caltrans-18

The comment asks if it is possible that the increase in groundwater elevation could cause a significant increase in vapor intrusion to structures in the area.

Response Caltrans-18

The modeling conducted under this Plan was meant to evaluate the overall impact of various pumping and recharge scenarios on the long-term water balance of the basins and their potential impacts on groundwater levels. The results suggest that no large scale increases in groundwater levels would occur which can cause changes in environmental conditions such as vapor intrusion

to structures. The groundwater elevation fluctuations are expected to be within the historical range of elevations. Site-specific modeling is recommended for evaluating localized effects.

Comment Caltrans-19

The comment asks, for Concept B, how were the acre-feet per year (AFY) of extraction arrived at as an additional extraction for the West Coast Basin? The comment asks, similarly how were the AFY arrived at for the Central Basin?

Response Caltrans-19

For the West Coast Basin, the quantity of Concept B extraction was based on the maximum historical groundwater production of the West Coast Basin, which was approximately 95,000 acre-feet per year, which is 30,000 acre-feet greater than the current adjudication.

For the Central Basin, Concept B extractions were based on 1) maximizing use of stormwater capture from the Rio Hondo and San Gabriel and Los Angeles Rivers (22,000 AFY), 2) potentially available recycled water from SJCWRP and LCWRP (66,800 AFY), and 3) implementation of a new, satellite advanced treatment plant to offset imported water demands in the Los Angeles Forebay (45,500 AFY).

Comment Caltrans-20

The comment requests that if work is done on or near Route 105, then using Route 105 for hauling should be minimized during peak hours.

Response Caltrans-20

The comment is noted. Chapter 3.12 Traffic and Transportation in the Draft PEIR includes analysis of increased traffic volumes as a result of the proposed GBMP projects. To ensure circulation system performance is maintained, Mitigation Measures TR-1 through TR-6 require preparation of a Traffic Control/Traffic Management Plan to ensure appropriate actions are taken to reduce congestion, local roadway impacts, and disruption of alternative transportation routes during construction (see Draft PEIR pages 4.12-15 through 4.12-17).

Comment Caltrans-21

The comment states that the DEIR should address adverse environmental impacts to surrounding communities from the proposed projects.

Response Caltrans-21

Impacts to surrounding communities have been evaluated at the program level in the Draft PEIR. Project specific and site specific impacts would be forthcoming in future subsequent CEQA assessments for each GBMP project.

Comment Caltrans-22

The comment states that the hazards to the proposed facilities should be addressed in the PEIR. The comment states that no mention is made of the hazards in the areas impacted by the rise in groundwater table and increased liquefaction potential, expansive soils.

Response Caltrans-22

Liquefaction potential and potential impacts from expansive soils are discussed in the Draft PEIR on pages 4.5-15 (Impact 4.5-1) and 4.5-19 (Impact 4.5-3).

Comment Caltrans-23

The comment states that cost to mitigate the problems caused by rise in groundwater elevation for the impacts properties needs to be addressed.

Response Caltrans-23

No large scale increases in groundwater levels would occur as a result of the proposed project. All potential groundwater elevation fluctuations would be within the historic range of the Montebello Forebay (see Draft PEIR page 4.9-40). In addition, increases in groundwater elevation are not expected with regularity (see Response Caltrans-13). The goal of the GBMP is to maintain groundwater levels by matching groundwater replenishment and extraction. Furthermore, CEQA Guidelines does not require an analysis of costs associated with implementation of mitigation measures.

Comment Caltrans-24

The comment states that the potential impacts of the proposed project on the underground Utilities in the Route 105 area need to be addressed.

Response Caltrans-24

The impacts of shallow groundwater on infrastructure and utilities are addressed in Chapter 4.9 Groundwater on pages 4.9-38 through 4.9-31. The Draft PEIR acknowledges that operation of the GBMP projects in the Central Basin may increase groundwater levels in the shallow aquifer due to increased recharge from the MFSG or other proposed recharge and injection locations. As a result, “subsurface structures and utilities could become inundated, potentially compromising their functions. Implementation of **Mitigation Measures GW-L1** and **GW-L2** would ensure that WRD monitors groundwater levels and implements measures to ensure groundwater levels do not impact subsurface structures.”

Comment Caltrans-25

The comment asks if there is any need for access roads and if the proposed project will have impacts to freeways or state highways within the footprint of the proposed groundwater basin.

Response Caltrans-25

The need for access roads will be determined at the project design stage as individual GBMP projects are developed, and associated environmental impacts to traffic and circulation on freeways or state highways will be evaluated in subsequent project-specific environmental analysis. The level of detail for each GBMP project that is available for assessment in the Draft PEIR does not include access roads.

Comment Caltrans-26

The comment states that if the Master Plan plans to perform work within the Department’s R/W then the NPDES Permit No CAS000003 needs to be mentioned in the document.

Response Caltrans-26

In response to the comment, text is added on page 4.8-15 to describe the NPDES Permit for Caltrans in Section 4.8.2 of the Draft PEIR.

Statewide NPDES Permit for Caltrans

The California Department of Transportation (Caltrans) is responsible for the design, construction, management, and maintenance of the State highway system, including freeways, bridges, tunnels, Caltrans' facilities, and related properties, and is subject to the permitting requirements of Clean Water Act section 402(p). Caltrans' discharges consist of storm water and non-storm water discharges from State owned rights-of-way.

Before July 1999, discharges from Caltrans' MS4 were regulated by individual NPDES permits issued by the Regional Water Boards. On July 15, 1999, the State Water Board issued a statewide permit (Order No. 99-06-DWQ) which regulated all discharges from Caltrans MS4s, maintenance facilities and construction activities. On September 19, 2012, the Department's permit was re-issued (Order No. 2012-0011-DWQ) and became effective on July 1, 2013.

Caltrans' Storm Water Management Plan (SWMP) describes the procedures and practices used to reduce or eliminate the discharge of pollutants to storm drainage systems and receiving waters. Since storm water discharges from MS4s are highly variable in frequency, intensity, and duration, and it is difficult to characterize the amount of pollutants in the discharges, the inclusion of BMPs in lieu of numeric effluent limitations is appropriate in storm water permits. Order No. 2012-0011-DWQ requires implementation of BMPs to control and abate the discharge of pollutants in storm water. To assist in determining if the BMPs are effectively achieving standards, Order No. 2012-0011-DWQ requires effluent and receiving water monitoring. The monitoring data will be used to determine the effectiveness of the applied BMPs and to make appropriate adjustments or revisions to BMPs that are not effective.

Comment Caltrans-27

The comment states that further investigation is needed by WRD on the potential spreading basin along the 710 Freeway.

Response Caltrans-27

Injection wells along the 710 freeway will recharge water into the deep producing aquifer. There will be no impacts to shallow groundwater levels along the 710 freeway, unlike project conditions along the 105 freeway which involves elevated shallow groundwater levels due to recharge via percolation at the MFSG.

Comment Caltrans-28

The comment states that the data provided in Section 2.1.2 of Appendix C of the Draft PEIR should be forward looking toward the impacts of additional storage. This also applies to Figure 11.

Response Caltrans-28

Appendix C of the PEIR was a separate groundwater modeling analysis conducted to solely assess the impact the Groundwater Reliability Improvement Project (GRIP). The historical data discussed in section 2.1.2 Groundwater Budget were used to establish a baseline scenario against which the impact of GRIP, which simply exchanges variable imported recharge component of recharge at the Montebello Forebay Spreading Grounds with a relatively constant source of recycled water recharge from GRIP.

Conversely, the modeling conducted for the GBMP does indeed consider the forward looking impacts of additional storage by showing the impacts of various recharge and extraction scenarios.

Comment Caltrans-29

The comment states that in Section 3.2 of Appendix C of the Draft PEIR, WRD is only discussing replacement water not new water levels. This is not consistent with the Groundwater Management Plan. A discussion of new water wells needs to be included.

Response Caltrans-29

Appendix C was a separate groundwater modeling analysis conducted to solely assess the impact the Groundwater Reliability Improvement Project (GRIP). The modeling conducted for the GBMP does consider the forward looking impacts of additional storage by showing the impacts of various scenarios, including new water wells.

Comment Caltrans-30

The comment requests an explanation of why CH2M Hill modeled the impact of the GRIP, however from the information provided it does not look like they used an increase in water.

Response Caltrans-30

The GRIP project is intended to replace previously spread imported water (averaging 21,000 AFY) at the Montebello Forebay Spreading Grounds (MFSG). As such, there is no net increase in recharge water directly attributable to GRIP; rather, GRIP recycled water replaces the imported water that was previously recharged at the MFSG.

Comment Caltrans-31

The comment states that the WRD discusses in the GMBP all of the intended imports and the acre feet but in Appendix C none of these volumes are addressed.

Response Caltrans-31

This comment appears to be related to Appendix C, which was a separate groundwater modeling analysis conducted to solely assess the impact the GRIP on the groundwater basin. Implementation of GRIP assumes that the historic replenishment with imported water will be completely replaced with recycled water produced by GRIP.

Comment Caltrans-32

The comment asks how the GBMP model came up with the groundwater levels increasing five to 10 feet on page 4.9-40 of the Draft PEIR.

Response Caltrans-32

The GBMP model simulated the groundwater levels based on various pumping and recharge scenarios. The changes in elevations with respect to the historical levels vary spatially and temporally. On page 4.9-40 of the Draft PEIR, it is explained that the GBMP modeling generally assumes that increased replenishment is matched by increased pumping such that groundwater elevations do not change significantly. However, additional modeling was performed to evaluate the impact of utilizing all available storage space in the Central Basin without a corresponding increase in extraction. This scenario is documented in the GBMP Appendix L, Modeling of Basin Filling Operations. The model result showed minimal increases in water levels with the highest increase of 15 feet occurring near the MFSG where replenishment occurs. The increase in groundwater levels decreases with distance from the MFSG, and the model results indicate that groundwater levels may increase five to 10 feet in the vicinity of Interstate 105 and the existing Caltrans dewatering facilities (Draft PEIR, page 4.9-40). This model result is shown graphically in GBMP Appendix L.

Comment Caltrans-33

The comment asks if Caltrans and WRD need to program a project to address any future changes in Caltrans pump and treat facility.

Response Caltrans-33

Expected water level fluctuations are within the natural range of variability at the Montebello Forebay. No project is necessary because there would be no expected changes in water level fluctuations relative to baseline conditions at the Caltrans pump and treat facility.

Comment Caltrans-34

The comment requests the forecasted date/year for the Central Basin to be in “Concept B” mode.

Response Caltrans-34

There is not a specific forecasted date/year for the Central Basin to be in “Concept B” mode. There are approximately 20,000 acre-feet per year of unused water rights. It is expected that the Central Basin will transition to “Concept B” mode after all of these unused rights have been utilized.

Comment Caltrans-35

The comment requests the estimated timeframe to reach the stage of additional replenishment (above the APA) for the Central Basin and project implementation.

Response Caltrans-35

There is no timeframe for the implementation of specific projects. The concepts identified in the GBMP will serve as a starting point for further project development by interested parties. Prior to

implementation of a project, it will require review and approval by the Central Basin Watermaster Storage Panel.

Comment Caltrans-36

The comment requests a specific discussion of impacts to existing infrastructure (Route 105).

Response Caltrans-36

Please refer to Response Caltrans-13.

Comment Caltrans-37

The comment asks if the USGS/Modflow included/factored in the Route 105 freeway pumped groundwater.

Response Caltrans-37

Yes, the model included the Route 105 wells. The historical pumping used in the groundwater model included Caltrans extractions.

Comment Caltrans-38

The comment requests that each project that will utilize Caltrans pumped groundwater (if any) should be addressed, and indicate how it will be implemented as part of the GBMP.

Response Caltrans-38

None of the GBMP projects currently use Caltrans pumped water.

Comment Caltrans-39

The comment states the use of Route 105 pumped groundwater should be analyzed as an alternative to meet the replenishment needs in the Central Basin in order to maximize the beneficial reuse of the 105 pumped groundwater.

Response Caltrans-39

The use of Route 105 groundwater to meet the replenishment needs of the basin has been evaluated in the past and was found to be cost prohibitive.

Comment Caltrans-40

The comment asks if there is any possibility to revive the Agreement between Caltrans and WRD to construct a pipeline from the Caltrans dewatering wells to the DGBP/Seawater barrier site.

Response Caltrans-40

The concept of conveying Caltrans 105 pumped groundwater to the Dominguez Gap Barrier was evaluated in the past and found to be cost prohibitive. The expanded Terminal Island Treatment Plant will provide all future water demands at the barrier.

Comment Caltrans-41

The comment asks if, as a result of the proposed GBMP, there will be additional constituents that are not currently present and must be treated by the Caltrans facility.

Response Caltrans-41

There is not expected to be additional constituents that are not currently present. All additional replenishment identified in the GBMP will be with water of equal or greater quality to that currently being used. Water quality impacts are discussed beginning on page 4.9-32 of the Draft PEIR.

Comment Caltrans-42

The comment states that the Draft PEIR mentions that groundwater will rise 5 to 10 feet in the vicinity of the existing Caltrans dewatering wells. The comment asks how this will be mitigated to protect the 105 freeway facility.

Response Caltrans-42

Please see Response Caltrans-6.

Comment Caltrans-43

The comment states that mitigation measures (GW-L1, 2 & Q7) need to include affected entities in discussions for monitoring their respective sites.

Response Caltrans-43

The mitigation language included in the Draft PEIR is designed to ensure oversight of monitoring/management/modeling by the Watermaster Storage Panel. This does not preclude discussions between the Watermaster and implementing agencies, or “affected entities,” in developing such requirements.

Comment Caltrans-44

The comment states that Caltrans should be included under the jurisdiction/entity column in Table 4.10-1, where proposed GBMP projects will be implemented.

Response Caltrans-44

Table 4.10-1 is intended to list the existing general plan land use designations in and around specific GBMP projects for the purposes of the CEQA land use and planning analysis. Caltrans is not an agency with land use jurisdiction similar to municipalities listed in Table 4.10-1 and as such it is not appropriate to add Caltrans to the table.

Comment Caltrans-45

The comment requests that the potential impacts to freeway facilities should be listed where GBMP projects will occur.

Response Caltrans-45

The Draft PEIR states on page 4.10-17 that potential project facilities will cross various ROWs across municipalities. The majority of figures included in the Draft PEIR show major freeways in relation to project facilities. Specifically, Figure 3-1 shows the relationship between individual GBMP projects and freeways in the project area. Figure 4.12-1 shows major regional roadways in the WRD service area, including Interstates and California State Routes. Further, Appendix B

includes detailed maps of each proposed facility which clearly illustrates relationships with roadways.

Comment Caltrans-46

The comment states that for Table 5-2 in the Draft PEIR, updated/expected completion years for Caltrans projects should be inserted.

Response Caltrans-46

In response to the comment, completion years are added to Caltrans projects where available to Draft PEIR Table 5-2.

**TABLE 5-2
RELATED PROJECTS**

Project Name	Project Type / Location	Project Sponsor	Project Status
Transportation Projects			
Interstate 5 Improvement Projects in Southern Los Angeles	Create HOV lanes, mixed flow lanes, interchange modifications, pedestrian overcrossings, and frontage road modification.	Caltrans	Construction 2012 to 2016 <u>2018</u> .
I-10/I-605 Direct Connector	Construction of a direct connector fly-over to ease traffic congestion from southbound I-605 and eastbound I-10.	Caltrans	Construction completed by 2015 <u>Complete</u>
I-105 Modification and upgrade of pumping/filtration system	I-105 westbound between Paramount Blvd and Garfield Ave.	Caltrans	Planning <u>Unknown</u>
I-105 and I-110	Pavement and culvert repair at the I-105 and I-110 Interchange	Caltrans	Planning <u>Unknown</u>
SR 47 Schuyler Heim Bridge Replacement	Replacement of bridge with a fixed-span bridge structure, providing a permanent navigable channel and no traffic delays due to bridge lifting.	Caltrans	Construction from 2011 to 2017
Long Beach Freeway (I 710) Pavement Rehabilitation Project	Installing precast concrete panels and concrete slabs in various traffic lanes and locations, upgrading median barrier, and constructing maintenance pullouts along route.	Caltrans	Construction from 2012 to 2016

SOURCES: City of Los Angeles Department of Public Works, Uniform Project Reporting System (UPRS) Project Reports, 2015; City of Compton, *Urban Water Management Plan*, 2005; City of Los Angeles, *Water Integrated Resources Plan 5-Year Review FINAL Document*, 2012; City of Vernon, *Urban Water Management Plan*, 2011; Caltrans, 2015; Los Angeles World Airports 2015; Cities of Bell, Carson, Cudahy, Downey, El Segundo, Industry, Long Beach, Norwalk, Pico Rivera, South Gate, Vernon, 2015

Comment Caltrans-47

The comment asks how the conclusion that a “no project alternative” would result in a slightly less potential for water levels to increase and affect surface/subsurface infrastructure was reached.

Response Caltrans-47

The No Project Alternative, which is discussed on pages 7-8 through 7-16 of the Draft PEIR, includes implementation of some but not all proposed GBMP projects in order for WRD to meet replenishment obligations. As explained on page 7-8 of the Draft PEIR, one of WRD’s primary

responsibilities is to replenish the West Coast Basin and Central Basin sufficiently so pumpers can extract groundwater up to their water rights in the West Coast Basin and up to the APA in the Central Basin. Because the No Project Alternative does not include implementation of all GBMP projects, there is less potential for water levels to increase and therefore affect surface/subsurface infrastructure.

Comment Caltrans-48

The comment states that the tables 7-1 and 7-3 should include a category for infrastructure and given a proper impact category.

Response Caltrans-48

Infrastructure is not an environmental resource category under CEQA. Impacts to infrastructure are evaluated based on related impacts to environmental resources, such as impacts to the storm water infrastructure due to project-related impacts to surface water runoff (see Chapter 4.13 Utilities, Public Services, and Energy) or impacts to subsurface structures due to shallow groundwater levels. Impacts to infrastructure associated with impacts to environmental resources are described throughout the Draft EIR as appropriate. No modification to Tables 7-1 and 7-3 are warranted.

Comment Caltrans-49

The comment requests that predictions of impacts to water quality downgradient of the MFSG where concentrations may exceed Basin Plan be provided.

Response Caltrans-49

No specific predictions were made as part of the GBMP, however, all additional replenishment water identified in the plan is of equal or greater quality to water that has historically been used for replenishment. Please refer to the analysis of impacts to water quality in the Draft PEIR on pages 4.9-34 through 4.9-37.

Comment Caltrans-50

The comment states that Table 8 lists CECs requirement as at least 90 percent removal based on an occurrence study. The comment asks if this concentration be a moving target or fixed for the life of the permit. The comment asks what responsibility WRD will take when the water quality of downgradient users has been degraded by high concentrations of CECs when an unspecified 90 percent removal is used. The comment asks how WRD will address other constituents.

Response Caltrans-50

The comment pertains to Table 8 of Appendix C to the Draft PEIR, which is a technical memorandum specific to the GRIP project. The removal rate for CECs is a regulatory requirement as published in the Groundwater Replenishment Regulations adopted on June 18, 2014. Such requirements will be included in the permit for GRIP, which is currently being prepared.

Comment Caltrans-51

The comment asks if all the CECs were evaluated at nanogram concentrations. The comment asks if Nanomaterial contaminants are included in the CECs.

Response Caltrans-51

The comment pertains to Section 4.2.4 of Appendix E of the Draft PEIR, which is a technical memorandum describing the status of recycled water regulations as of October 2014. Section 4.2.4 summarizes the results of various independent researchers as cited in the technical memorandum. Section 4.2.4 states that Ciprofloxacin has been found in recycled water at a concentration of 9 nanograms per liter (ng/L). As stated in Section 4.2.4, “[b]ecause many CECs do not have established drinking water standards or advisory levels, researchers have developed a method to describe an estimate of the amount of a substance in drinking water, expressed on a body-weight basis (usually in milligrams of the substance per kilograms of body weight per day), that can be ingested daily over a lifetime without appreciable risk.” The section goes on to report Drinking Water Equivalent Levels (DWELs) for CECs in micrograms per liter.

Comment Caltrans-52

The comment states that there should be an explanation if Cal/EPA, Office of Environmental Health Hazard Assessment (OEHHA) was consulted and agreed with the approach in calculating DWEL, and how it was determined to use an equation that differs from OEHHA that uses relative source consumption and upper 95% confidence limit on the cancer potency slope.

Response Caltrans-52

The comment pertains to Section 4.2.4 of Appendix E of the Draft PEIR, which is a technical memorandum describing the status of recycled water regulations as of October 2014. Section 4.2.4 discusses the DWEL that was used by various independent researchers as cited in the technical memorandum; the methodology that uses DWEL is briefly explained.

Comment Caltrans-53

The comment states that the Risk Assessment section should be revised to reflect the Risk Assessment Guidance for Superfund rather than that used by the USEPA Office of Drinking Water.

Response Caltrans-53

The comment pertains to Section 7.2 of Appendix E of the Draft PEIR, which is a technical memorandum describing the status of recycled water regulations as of October 2014. The risk assessment guidance by the USEPA Office of Drinking Water is appropriate to the GBMP since the aquifers being managed are potable aquifers used for drinking water. The Risk Assessment Guidance for Superfund is not applicable.

Comment Caltrans-54

The comment states that when traffic control/handling plans are available for GBMP projects, they should be submitted to Caltrans for review.

Response Caltrans-54

The comment is noted, where applicable. Please refer to Mitigation Measures TR-1 through TR-6, which require preparation and implementation of traffic control plans, to be approved by the appropriate local jurisdictions, like Caltrans.

Comment Caltrans-55

The comment requests methods of groundwater elevation simulation, files used to run the simulations in Modflow, and the simulated quantities of water conserved at the Rio Hondo and San Gabriel Spreading grounds, to be provided.

Response Caltrans-55

Methods used for simulation of groundwater elevations are summarized in Section 4 of the GBMP report. Quantities of water conserved at the Rio Hondo and San Gabriel spreading grounds are summarized in Section 3 of the GBMP.

WRD will provide the requested files. Please contact Jason Weeks at 562-275-4253 or jweeks@ wrd.org.

Comment Caltrans-56

The comment asks if liquefaction, settlement, or inundation of the I-105 and rail facility have been considered as part of the Draft PEIR analysis.

Response Caltrans-56

Liquefaction potential is addressed in the Draft PEIR on page 4.5-16. Potential impacts from settlement are addressed on page 4.5-18 of the Draft PEIR. Potential impacts from inundation are addressed on pages 4.9-38 to 41 of the Draft PEIR. Impacts resulting from specific projects will be evaluated individually in accordance with CEQA at a project-level once design is complete.

Comment Caltrans-57

The comment states that any specific volumes of water or locations of recharge be provided.

Response Caltrans-57

Specific volumes of water associated with each individual GBMP project are provided in Table 3-5 and locations of projects are provided in detail in the Map Atlas in Appendix B of the Draft PEIR. Volumes are also presented in the Groundwater section in Table 4.9-2.

Comment Caltrans-58

The comment states that the Draft PEIR does not consider liquefaction potential to existing structures. The comment also states that the Draft PEIR does not specify how “increased storage” will be achieved, or how “storage” will be measured to evaluate progress/completion of the various GBMP projects.

Response Caltrans-58

Liquefaction potential is addressed in the Draft PEIR on page 4.5-16, including potential structural damage caused by liquefaction and localized liquefaction hazards caused by elevated

groundwater levels. Mitigation Measures GEO-1 and GEO-2 would mitigate for potential impacts to structures due to liquefaction hazards.

As part of the GBMP, implementation of Concept B projects would allow for recharge above existing replenishment requirements and extraction of a similar volume of groundwater above the adjudicated extraction limits. Concept B assumes extraction increases commensurate with replenishment. By matching replenishment and extraction, the GBMP assumes that groundwater levels would not increase under Concept B (see Draft PEIR page 3-7). The groundwater modeling for the GBMP, however, does evaluate a scenario that assumes extraction is less than replenishment and as such, groundwater storage occurs and causes groundwater levels to rise (see Draft PEIR pages 4.9-40 through 4.9-41).

Storage in the basins is measured on an annual basis and reported in WRD's annual Engineering Survey and Report. This report also contains a summary of water levels throughout the basin. In addition WRD's Regional Groundwater Monitoring Report contains a summary of water quality and water levels throughout the District's network of nested monitoring wells.

Monitoring associated with a specific storage project will be required as part of the review and approval process of the Watermaster Storage Panel.

Comment Caltrans-59

The comment states that there is no explanation of how WRD will apply the additional 103,250 AFY to the CBWCB area.

Response Caltrans-59

The GBMP evaluates various scenarios, which are different combinations of proposed GBMP projects as listed in Table 3-5 of the Draft PEIR, to meet the targeted replenishment goals. In the Central Basin, under Concept B, the goal of the GBMP is to provide 103,250 AFY of additional replenishment above the current APA to support a target extraction volume of up to 320,617 AFY (Draft PEIR page 3-7).

Table 4.9-3 in Chapter 4.9 Groundwater lists the scenarios and their component projects, broken down by basin (West Coast or Central) and concept (Concept A or Concept B). The last scenario in Table 4.9-3, Scenario CB-B2, includes projects that would provide over 103,250 AFY of additional replenishment under Concept B in the Central Basin, to support the targeted extraction volume of 320,617 AFY.

Comment Caltrans-60

The comment states that there are no results of analysis presented to demonstrate any consideration of geotechnical hazards to existing structures from liquefaction, settlement or inundation.

Response Caltrans-60

Please refer to response Caltrans-56.

Comment Caltrans-61

The comment states that Appendix C does not provide specific information on how recharge and extraction are modeled and no output files are provided from simulation modeling.

Response Caltrans-61

WRD will provide the requested files. Please contact Jason Weeks at 562-275-4253 or jweeks@wrdd.org.

Comment Caltrans-62

The comment states that the model simulation in Appendix C of the Draft PEIR applies a lesser quantity of water spread in the 10 model years as shown in Table 5 compared to the actual years analyzed, as shown in Table 4.

Response Caltrans-62

The data presented in Tables 4 and 5 of Appendix C of the Draft PEIR pertain to Water Years 2001 through 2010. Table 4 reflects actual historic conditions, and Table 5 reflects the goal of GRIP, to eliminate the use of imported water for replenishment and increase the use of recycled water for replenishment by 21,000 AFY. As shown in Table 5, total imported water is zero, and the recycled water total for 10 years is 210,000 AF (21,000 AFY x 10 years) greater than the amount in Table 4. The historic data shown in Table 4 is not the data used to define GRIP or derive 21,000 AFY as the project goal. For the selected Water Years of 2001 through 2010, the actual amount of imported water recharged exceeded 21,000 AFY on average. There was 242,745 AF of imported water recharged over ten years, and GRIP would replace that with 210,000 AF over the same ten years. Therefore, it appears as though GRIP results in a lesser quantity of water spread. However, GRIP provides greater consistency and reliability of water available for spreading, no longer subject to the variability in the availability of imported water supplies. The result is also arbitrary based on the selected time period. If the analysis was conducted on a more recent 10-year period that included the drought conditions of the last three years, it would likely show that GRIP results in an increase in the amount of water spread due to the lack of availability of imported water supplies.

Comment Caltrans-63

The comment states that Section 4.7 needs to state the impact on the environment from the hazardous materials and mitigation measures needed to minimize hazards.

Response Caltrans-63

The Hazards and Hazardous Materials section, Section 4.7, includes an impact analysis on page 4.7-17 through 4.7-25 of the Draft PEIR. Mitigation Measures HAZ-1, HAZ-2, HAZ-3, and TR-1 and TR-6 are used to reduce impacts to a less than significant level.

Comment Caltrans-64

The comment states that Section 4.7, subsection Hazardous Materials on page 4.7-3, should be revised to correctly refer to hazardous waste, as not all hazardous waste regulations apply to hazardous materials.

Response Caltrans-64

In response to the comment, the subheading on page 4.7-3 is revised to include hazardous waste as well as hazardous materials.

Hazardous Materials and Waste**Comment Caltrans-65**

The comment states that hazardous waste includes listed RCRA hazardous waste, non-RCRA hazardous waste, and Special Waste.

Response Caltrans-65

The comment is noted for the record.

Comment Caltrans-66

The comment states that section 22 CCR 66261.10 applies to hazardous waste not material, and that certain text should be revised for clarification.

Response Caltrans-66

As stated on page 4.7-3, the CEQA analysis is intended to pertain to hazardous substances, which include both hazardous materials and hazardous waste, per CCR Section 66261.20. The section on page 4.7-3 is intended to provide background setting and information on both hazardous materials and hazardous waste. In response to the comment, the Draft PEIR text on page 4.7-3 has been revised as follows:

A hazardous ~~material~~ waste is defined by 22 CCR Section 66261.10 as a substance or combination of substances that may cause or significantly contribute to an increase in serious, irreversible, or incapacitating illness or death or may pose a substantial ~~presence~~ present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed.

Comment Caltrans-67

The comment states that a Phase 1 ESA needs to be performed because the environmental database review may not identify all sites with the presence or likely presence of hazardous substances and petroleum products on, in, or at properties.

Response Caltrans-67

A review of applicable hazardous materials and waste databases was conducted as required by CEQA (Draft PEIR page 4.7-3 and 4.7-4). Phase I ESAs will be done for individual subsequent GBMP projects as they are implemented and designed.

Comment Caltrans-68

The comment states that Section 4.7.2 should include that California is authorized by USEPA to implement RCRA and is responsible for regulating generators, treatment, storage and disposal facilities, and management of hazardous waste.

Response Caltrans-68

In response to the comment, the text on page 4.7-6 is revised to clarify the role of the State of California in implementing RCRA.

RCRA is considered a “cradle to grave” statute for hazardous wastes in that it addresses all aspects of hazardous materials from creation to disposal. California is authorized by the USEPA to implement RCRA and is responsible for regulating generators, treatment, storage and disposal facilities, and management of hazardous waste.

Comment Caltrans-69

The comment states that it should be clear that Cal/OSHA is the regulatory agency in California responsible for ensuring worker safety.

Response Caltrans-69

In response to the comment, the text on page 4.7-10 is revised to clarify the role of CalOSHA.

The California Division of Occupational Safety and Health (CalOSHA), the regulatory agency responsible for ensuring worker safety, also enforces hazard communication program regulations, which contain worker safety training and hazard information requirements, such as procedures for identifying and labeling hazardous substances, communicating hazard information relating to hazardous substances and their handling, and preparation of health and safety plans to protect workers.

Comment Caltrans-70

The comment states that section 4.7.2 should include information about the California Highway Patrol’s protocols for transportation of hazardous waste.

Response Caltrans-70

In response to the comment, the text on page 4.7-9 is revised to clarify transport of hazardous waste procedures in California.

California regulations specify specific cleanup actions that must be taken by a hazardous waste transporter in the event of a discharge or spill, and for the safe packaging and transport of hazardous wastes. All transporters of hazardous waste are required to participate in the California Highway Patrol’s Biennial Inspection of Terminal Program.

Comment Caltrans-71

The comment states that page 4.7-9, under Waste Classification Criteria, should include hazardous waste, non-RCRA hazardous waste, and Special Waste.

Response Caltrans-71

RCRA is included in the Regulatory Framework section on page 4.7-5 under the Federal subheading. The description of Waste Classification Criteria on page 4.7-9 pertains to State classification criteria. No edit is warranted.

Comment Caltrans-72

The comment states that section 4.7.2 should describe the other characteristics that would deem waste as hazardous as was described in detail for toxicity.

Response Caltrans-72

The comment is noted for the record. The level of detail provided is commensurate with that necessary for the analysis.

Comment Caltrans-73

The comment states the project would require routine transport and use of new chemicals for purposes of producing recycled water at new treatment facilities. The comment states that even though the location and design of such facilities is not fully known, a discussion of typical mitigation measures to prevent or minimize impacts to the environment needs to be stated. The comment provides examples.

Response Caltrans-73

In the discussion of Impact 4.7-1 on pages 4.7-18 and 4.7-19, the Draft PEIR states that treatment facilities would require routine transport and use of new chemicals for producing advanced treated recycled water. The implementing agency shall be required to comply with all relevant and applicable federal, State, and local laws and regulations that pertain to the transport, storage, and use of hazardous materials during operation of the proposed facilities. Compliance with these laws would minimize the potential hazard to the public or environment. For clarification, in response to the comment, the following modification is made to page 4.7-19:

Operation of expanded treatment plant facilities under both Concept A and Concept B, including the proposed Satellite AWTF (Concept B, Project C10), would require routine transport and use of new chemicals for purposes of producing advanced treated recycled water. The implementing agency shall be required to comply with all relevant and applicable federal, State and local laws and regulations that pertain to the transport, storage, and use of hazardous materials during operation of proposed facilities. For example, gasoline and other hazardous materials may be required to be contained in USDOT-approved containers for storage and transport; secondary containment of hazardous materials may be required in storage areas; contingency plans may be required to define responses to accidental release of hazardous materials including containment and remediation actions. Compliance with these laws would minimize the potential hazard to the public or environment due to routine transport, storage, and use of hazardous materials. Impacts would be less than significant under both Concept A and Concept B.

Comment Caltrans-74

The comment states that under Impact 4.7-2, there should be discussion of exposure to workers to contaminated vapors from volatile organic compounds (VOCs) released due to soil disturbance. The comment also states that there should be discussion of the water treatment systems used and any emissions/vapors, degradation products from treatment.

Response Caltrans-74

Various GBMP projects include new proposed treatment systems to produce advanced treated recycled water; such systems would not result in any emissions or vapors. In response to the comment the following clarification is made to the text of the Draft PEIR on page 4.7-19:

Construction of the proposed project could result in the exposure of construction workers and nearby residents to potentially contaminated soils (e.g., volatile organic compounds) or groundwater due to improper use, storage, or disposal of hazardous materials and/or leakage from underground storage tanks or other chemical containers on site.

Implementation of **Mitigation Measure HAZ-1** and **HAZ-2** would reduce these potentially hazardous impacts from construction activities to a less than significant level under Concept A and Concept B.

Comment Caltrans-75

The comment states that section 4.7.3 needs to include air monitoring to determine if emissions are migrating off-site and toward schools. Mitigation measures need to include stop work if school is downwind of construction activities that could impact schools. The comment states that compliance with SCAQMD Rules 403 and 1166 at a minimum should also be included.

Response Caltrans-75

The applicability of SCAQMD Rule 403 is included in the Draft PEIR in Chapter 4.2 Air Quality. Also, Mitigation Measure HAZ-1 requires preparation of a Contingency Plan to determine the response in the event that contaminated soils or groundwater are discovered. Appropriate regulatory agencies would be consulted during preparation of the Contingency Plan. The Contingency Plan would include, if applicable, responses in accordance with SCAQMD Rules 403 and 1166 and necessary protective measures for projects that are within a quarter mile of an existing or proposed school.

Comment Caltrans-76

The comment states that an explanation is needed on what measures are contained in the HMBP, RMP, and ERP and they should be included in the Mitigation Measures. These plans need to be made available for public comment.

Response Caltrans-76

The HMBP, RMP, and ERP are operational plans, related to operation of treatment facilities associated with the GBMP projects. Mitigation Measures HAZ-1 and HAZ-2 require preparation of a Contingency Plan for Contaminated Soil or Groundwater and a Hazardous Materials Management Spill Prevention and Control Plan, both applicable to construction activities rather than operational activities. As individual GBMP projects are implemented, the measures included in existing HMBP, RMP, and ERP would be discussed.

Comment Caltrans-77

The comment states that the proposed project could be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. It needs to be clear that Phase 1 Environmental Site Assessment will be performed in accordance with

ASTM 1527-13. The comment states that Mitigation Measures HAZ-1, HAZ-2 and HAZ-3 need to include proper construction of injection and extraction wells and piping so they will not cause cross contamination. The comment states that Mitigation Measure HAZ-3 needs to include soil-vapor sampling.

Response Caltrans-77

Implementation of Mitigation Measure HAZ-3 will require implementing agencies to complete Phase I Environmental Site Assessments in accordance with all applicable laws and regulations. Mitigation Measures HAZ-1, HAZ-2, and HAZ-3 are adequate at the program level to minimize impacts associated with hazardous materials. The comment does not specify the cross-contamination that needs to be avoided or what contamination would be exacerbated otherwise. Mitigation Measure HAZ-3 requires studies and soil/groundwater sampling that would identify potential soil-vapor hazards and determine if specialized personal protective equipment would be required for construction workers.

Comment Caltrans-78

The comment states that Table 8 list CECs requirement as at least 90 percent removal based on an occurrence study. The comment asks if this concentration be a moving target or fixed for the life of the permit. The comment asks what responsibility WRD will take when the water quality of downgradient users has been degraded by high concentrations of CECs when an unspecified 90 percent removal is used. The comment asks how WRD will address other constituents.

Response Caltrans-78

Please refer to Response Caltrans-50.

Comment Caltrans-79

The comment asks if all the CECs were evaluated at nanogram concentrations. The comment asks if Nanomaterial contaminants are included in the CECs.

Response Caltrans-79

Please refer to Response Caltrans-51.

Comment Caltrans-80

The comment states that there should be an explanation if Cal/EPA, Office of Environmental Health Hazard Assessment (OEHHA) was consulted and agreed with this approach, and how it was determined to use equation that differs from OEHHA that uses relative source consumption, and upper 95% confidence limit on the cancer potency slope.

Response Caltrans-80

Please refer to Response Caltrans-52.

Comment Caltrans-81

The comment states the predictions of impact to water quality downgradient of the MFSG where concentrations may exceed Basin Plan be provided.

Response Caltrans-81

Please refer to Response Caltrans-49.

Comment Caltrans-82

The comment states that based on analysis it is believed that Concept B could result in a rise of groundwater elevation to pavement grade at the I-105 segment between I-710 and I-605

Response Caltrans-82

The modeling conducted for analysis of the GBMP scenarios included sufficient extraction such that historical groundwater levels were maintained, with limited variation. Specific projects will be modeled prior to implementation to identify the necessary extraction operations to support additional replenishment and limit groundwater elevation increases. Please refer to Response Caltrans-32.

Comment Caltrans-83

The comment states that no specific details of project scenarios are provided in the GBMP Draft PEIR. The comment states that as a result, Caltrans cannot validate any modeling done to evaluate the rise of groundwater elevation as a result of Concept B on existing highway structures.

Response Caltrans-83

The modeling and scenarios are described in the GBMP. The GBMP will be available on WRD's website (www.wrd.org) and upon request. Model files also are available upon request. Please contact Jason Weeks at 562-275-4253 or jweeks@wrd.org. Also please refer to Response Caltrans-32, Response Caltrans 23 and Response Caltrans-13.

Comment Caltrans-84

The comment states that in order for Caltrans to determine an increase cost for dewatering as a result of groundwater recharging, more detailed analysis is required by the GBMP/WRD.

Response Caltrans-84

Please refer to Response Caltrans-23.

Comment Caltrans-85

The comment states that there are additional, existing wells along Route 105 located from Paramount Blvd to Route 605. These wells also need to be factored into the DEIR analysis.

Response Caltrans-85

The effects of the proposed GBMP projects to Caltrans dewatering wells along Route 105 in the vicinity of Paramount Blvd and Route 605 are discussed in the Draft PEIR on pages 4.9-40. Please refer to Response Caltrans-1 and Response Caltrans-6.

Comment Caltrans-86

The comment states that any extra incurred effort and costs by Caltrans for additional dewatering derived from the GBMP needs to be addressed.

Response Caltrans-86

Please refer to Response Caltrans-23.

Comment Caltrans-87

The comment states that a beneficial use of the groundwater pumped from Caltrans wells along Route 105 needs to be provided.

Response Caltrans-87

The GBMP does not include a project that would use the groundwater pumped from Caltrans' dewatering wells. Please also refer to Response Caltrans-39 and Caltrans-40.

Letter 7: Los Angeles County Department of Public Works

Comment LACDPW-1

The comment states that for specific revisions, additions, or deletions of wording directly from the project document the specific section, subsection, and/or item along with the page number is first referenced then the excerpt from the document is copied within quotations using the following nomenclature:

Deletions are represented by a ~~striketrough~~.
Additions are represented by *italics* along with an underline.
Revisions are represented by a combination of the above.

Response LACDPW-1

The comment is noted for the record.

Comment LACDPW-2

The comment suggests that mitigation needs to be implemented for Impact 4.8-1, specifically related to storm water and non-storm water runoff from construction sites under the requirements of the 2009 Construction General Permit, MS4 Permit, and the Los Angeles County Low Impact Development Ordinance, where applicable, and that the Draft PEIR should be revised accordingly.

Response LACDPW-2

The Draft EIR discusses applicability of the Construction General Permit and the MS4 Permit on page 4.8-21 of the Draft PEIR: Each “implementing agency would be required to acquire coverage under the statewide Construction General Permit (CGP) (SWRCB Water Quality Order 2009-0009-DWQ) by submitting a Notice of Intent to comply with the CGP and preparing and implementing a SWPPP, among other things” and that each “facility would be required to comply with minimum BMPs as specified by the Los Angeles County MS4 Permit (RWQCB Order No. R4-2010-0175), which would implement BMPs to provide erosion control, sediment control, and waste management strategies for construction sites.” All applicable laws and regulations have been identified and will be complied with, as discussed in the Draft PEIR.

In response to the comment, text has been added on page 4.8-16 to include language on the Los Angeles County Low Impact Development Ordinance.

Los Angeles County Low Impact Development Ordinance

The County of Los Angeles has prepared the 2014 Low Impact Development Standards Manual to comply with the requirements of the NPDES MS4 Permit for storm water and non-storm water discharges from the MS4 within the coastal watersheds of Los Angeles County (CAS004001, Order No. R4- 2012-0175). The LID Standards Manual provides guidance for the implementation of storm water quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from storm water and non-storm water discharges.

Comment LACDPW-3

The comment states that Table ES-1, page ES-17, Surface Hydrology and Water Quality, Item 4.8-3, should be revised to include language on the Low Impact Development Ordinance.

Response LACDPW-3

In response to the comment, Mitigation Measure HYDRO-1 is revised on page ES-17 and on page 4.8-23 to provide clarification on complying with the Los Angeles County Low Impact Development Ordinance.

HYDRO-1: Implementation of a Grading and Drainage Plan. Prior to construction of project facilities, the implementing agencies shall prepare a grading and drainage plan that identifies anticipated changes in flow that would occur on site and minimizes any potential increases in discharge, erosion, or sedimentation potential in accordance with applicable regulations and requirements for the County of Los Angeles and/or the city in which the facility would be located. In addition, all new drainage facilities shall be designed in accordance with standards and regulations set forth in the Hydrology Manual of the Los Angeles County Department of Public Works and the Low Impact Development Ordinance Manual from the Los Angeles County Department of Public Works. The plan shall identify and implement retention basins, best management practices, and other measures to ensure that potential increases in storm water flows and erosion would be minimized, in accordance with local requirements.

Comment LACDPW-4

The comment states that if there are questions regarding executive summary comments, contact Richard Gomez of Watershed Management Division.

Response LACDPW-4

The comment is noted for the record.

Comment LACDPW-5

The comment states Section 2.2.1, Central Basin, 2nd paragraph, page 2-4 does not correctly explain the correct agencies involved in the AGBP project.

Response LACDPW-5

In response to the comment, text is revised on page 2-4 to reflect the correct agency involvement with the AGBP project.

The Alamitos Gap Barrier Project (AGBP) is a seawater intrusion barrier that injects imported water (provided by the City of Long Beach) and advanced treated recycled water (provided by the Leo Vander Lans Plant ~~Long Beach Water Reclamation Plant~~) as the Leo Vander Lans Plant takes the tertiary treated water from Long Beach Water Reclamation and further treats it to supply the AGBP into 43 wells located along the coastal border between Los Angeles and Orange Counties. It has been in operation since 1964. The barrier system is owned by Los Angeles County Department of Public Works and Orange County Water District, operated, and maintained by the Los Angeles County Department of Public Works (LACDPW).

Comment LACDPW-6

The comment states Section 2.2.1, Central Basin, 2nd paragraph, page 2-4 does not correctly explain the Dominguez Gap Barrier Project.

Response LACDPW-6

In response to the comment, text is revised on page 2-4 to correctly explain the Dominguez Gap Barrier Project.

The Dominguez Gap Barrier Project consists of ~~41~~ 94 injection wells spaced over four miles along the Dominguez Channel. It has been in operation since 1969 and also utilizes ~~both potable and advanced treated~~ recycled water provided by the Los Angeles Department of Water and Power (LADWP) ~~City of Los Angeles~~ and the potable water is supplied by the West Basin Municipal District. LADWP on occasion substitute diluent water when they have issues meeting treatment demand to assure a steady flow into the barrier. Both barrier systems are shown on Figure 2-1. ~~These two~~ The barrier systems are solely ~~also~~ owned, operated, and maintained by LACDPW ~~similar to the Alamitos Gap Barrier Project.~~

Comment LACDPW-7

The comment states that section 2.3 should be revised to correct the mgd associated with the Long Beach WRP's advanced treatment used in the AGBP.

Response LACDPW-7

The comment is noted for the record. The numbers used in the GBMP are estimates and are based on conditions at a certain period of time and subject to change going forward. No change to the Draft PEIR is warranted.

Comment LACDPW-8

The comment states that Figure 2-2 should show the Whittier Narrows Dam (Rio Hondo Side) which accounts for a large portion of the replenishment of the Central Basin especially import water from CenB-48 and reclaim from the San Jose plant. The Rio Hondo side of Whittier Narrows Dam accounts for a large portion of the water replenished numbers called out by the report.

Response LACDPW-8

In response to the comment, the Whittier Narrows Dam has been added to Figure 2-2.

Comment LACDPW-9

The comment states that the 10,000 AFY due to the Advance Water Treatment should be considered a new replenishment at the SGCSG facility.

Response LACDPW-9

As described in the Draft PEIR pages 2-8 and 3-19, GRIP will offset imported water and does not result in new/additional replenishment. The 10,000 AFY of AWT recycled water will be used for recharge at the MFSG, specifically the San Gabriel Coastal Spreading Grounds (SGCSG) portion of the MFSG, instead of imported water. Therefore there is no new replenishment volume that results from implementation of GRIP.

Comment LACDPW-10

The comment states that the Draft PEIR has an incorrect date for injection listed in Section 2.5.3, Recycle Water Program, page 2-9.

Response LACDPW-10

In response to the comment, the text on page 2-9 is revised to reflect the correct date.

WRD has been using recycled water for groundwater recharge for surface spreading at the MFSG since 1962 and injection at seawater intrusion barriers since ~~1994~~ 1995.

Comment LACDPW-11

The comment states that page 2-8 refers to “GRIP” as Groundwater Improvement Reliability Project, but it should be “Groundwater Reliability Improvement Project.”

Response LACDPW-11

In response to the comment, the text on page 2-8 and 3-18 is modified to reflect the correct name.

~~**Groundwater Improvement Reliability Project**~~ **Groundwater Reliability Improvement Project**

Comment LACDPW-12

The comment states that the description of the Leo J. Van Water Treatment Facility Project included in the Draft PEIR overestimates the capacity due to maintenance and other extenuating circumstances.

Response LACDPW-12

The comment is noted for the record. The PEIR says “roughly 8,000 AFY” and the description is meant to reflect existing conditions and current injection rates, and doesn’t take into account future wells.

Comment LACDPW-13

The comment states that if you have any other questions regarding program background comments, please contact Rudy Rivera of Water Resources Division.

Response LACDPW-13

The comment is noted for the record.

Comment LACDPW-14

The comment states that the first paragraph on page 3-9 suggests that an additional 48,000 AFY of recycled water could be injected into the barriers, which equates to injecting 66 cfs more into the barriers beyond current usage. Doing this is beyond the criteria of the agreement between LACFCD and WRD which states that the barrier is to be operated to prevent seawater intrusion only and not recharge the aquifers.

Response LACDPW-14

The GBMP analyzes scenarios that, while technically feasible, would require coordination and agreement among the relevant agencies. The GBMP does not address such institutional considerations, but WRD recognizes their significance and that these issues will need to be resolved during the planning and implementation of specific projects.

The additional recycled water injected at the barrier would only occur as a result of increased inland extraction. The projected increases in recycled water injection at the barriers are for the purpose of maintaining protective elevations.

Comment LACDPW-15

The comment suggests that Table 3-2 on page 3-4 should indicate the portion of the Existing Artificial Replenishment attributable to the San Gabriel River reach of the Montebello Forebay.

Response LACDPW-15

Table 3-2 presents replenishment by basin and does not present specific information such as locations of existing artificial replenishment within each basin.

Comment LACDPW-16

The comment suggests that close coordination with the future AB530 Working Group is recommended to minimize conflicting plans between the GBMP and the AB530's revitalization plan for the Lower LA River.

Response LACDPW-16

The comment is noted for the record.

Comment LACDPW-17

The comment notes that Table 3-3 includes the capacity as the maximum production rate. The comment further states that LVLWTF would not be able to produce an average of 8 MGD over the course of a year due to shutdowns. In addition the Capacity of TIWRP is listed as 5 MGD when stated previously they are currently expanding the plant to produce 12 MGD.

Response LACDPW-17

In response to the comment, a footnote has been added to Table 3-3 to clarify maximum production rates.

Footnote 1: The numbers stated under the “Production” column reflect existing maximum production rates.

The capacity increase at TIWRP is accounted for as Project W0 in the GBMP. Please see Table 3-5 in the Draft PEIR.

Comment LACDPW-18

The comment states that the document should disclose any proposed rehabilitation of the piping networks and wells required to increase replenishment opportunities at the WCBBP and the DGBP.

Response LACDPW-18

In response to the comment, text is revised on page 3-11 to include language about rehabilitation of piping networks and wells.

In the West Coast Basin, direct injection is currently used to recharge the groundwater basin in addition to preventing seawater intrusion. As shown in Figure 3-1, direct injection facilities are currently located at the West Coast Basin Barrier Project (WCBBP) and the Dominguez Gap Barrier Project (DGBP). The Draft GBMP includes utilization of these barrier projects to increase replenishment opportunities as well as development of new injection wells in the West Coast Basin. Both systems are aging and may require rehabilitation of the pipeline networks and wells in order to achieve maximum design rates.

Comment LACDPW-19

The comment states that close coordination between WRD, County Sanitation, and Upper San Gabriel Valley Municipal Water District (USGVMWD) is recommended during the GBMP. USGVMWD is proposing a 36-inch waterline that will use San Jose Creek WRP as a source to spread approximately 11,000 AFY of reclaimed water at Santa Fe Spreading Grounds. This may affect the availability of reclaimed water for the future project as part of the GBMP plan.

Response LACDPW-19

The comment is noted. The GBMP is a planning level document that will be subject to changes going forward, per the plans of other implementing agencies.

Comment LACDPW-20

The comment states that Table 3-4 presents Concept B totals as 13,000 instead of 15,000. In Table 3-4 it shows a two to three times increase in the average injection rates into the barriers, nearing the design thresholds of both. In addition, the Executive Summary on Page E-5 states that Concept A would require an increase of 18,000 AFY over current conditions and an additional 30,000 AFY beyond that in the WCBBP. Under the proposal in Table 3-4, the existing injection barriers are planned to install all of the 18,000 AFY increase under Concept A and half of the additional 30,000 AFY under Concept B. In addition under Concept B the proposed average injection rate for the year is 55.25 cfs for WCBBP and 17.96 cfs for DGBP. The commenting

party states the maximum amount of water to be pushed through the system without major upgrades is 40-45 cfs and 12-15 cfs respectively.

Response LACDPW-20

For the GBMP, injection rates were estimated for planning purposes based on the methodology presented in Appendix D to the GBMP, Barrier Capacity Analysis Technical Memorandum. Actual injection rates will be evaluated on a project-specific basis as projects are implemented. Also, in response to the comment, a total in Table 3-4 is revised to reflect the correct amount:

**TABLE 3-4
PROPOSED SEAWATER INTRUSION BARRIER RECYCLED WATER INJECTION INCREASES (AFY)**

	Existing Treatment Capacity	Additional Injection under Concept A	Total under Concept A	Additional Injection under Concept B	Total under Concept B
West Coast Basin Barrier Project	17,000	15,500	32,500	7,500	40,000
Dominguez Gap Barrier Project	5,000	2,500	7,500	7,500	13,000 <u>15,000</u>

Comment LACDPW-21

The comment states that Table 3-5 lists the Strategy C0-B as 2,000 AFY going into the AGBP as a new replenishment volume. The comment states that the total amount being injected into the AGBP will not increase (as stipulated in the Recharge Mechanisms section of the document), and that the currently used imported water will be replaced with advanced treated recycled water. The comment further states that Table 3-5 needs to be updated to indicate the existing facilities as MFSG–Rio Hondo and MFSG–San Gabriel in order to quantify where new replenishments are to be transported.

Response LACDPW-21

Strategy C0-B is discussed in the Draft PEIR on page 3-19 as “Increase Injection of recycled Water at AGBP (Project C0)”. Given the program level planning analysis in the Draft PEIR, Table 3-5 does not specify yet which spreading ground within the MFSG would receive water for replenishment.

Comment LACDPW-22

The comment states that for Project C0, Increase Injection of Recycled Water at AGBP, the Draft PEIR on page 3-19 assumes that all reclaim provided by AWT will be delivered to San Gabriel Coastal Spreading Grounds (SGCSG) via the existing pipeline. Operationally, prior to storms, reclaim water in the pipeline is switched to bypass the facility and flow to the ocean. This maximizes flood control and storm water conservation. The comment suggests that the project description should state that AWT deliveries to SGCSG will be suspended prior to significant storms.

Response LACDPW-22

The comment is noted. There is no mention of SGCSG on page 3-19 of the Draft PEIR. The Project C0 mentioned in the comment would increase replenishment at the AGBP.

Comment LACDPW-23

The comment states that for Projects C1, C2, C3, C4, Increased Replenishment at the Montebello Forebay, the quantities shown on page 3-19 are not consistent and need to be updated to reflect approximately a ten year averages (2000 through 2009).

Response LACDPW-23

The implementation of projects C1, C2, C3 and C4 are not based on historical flows at the MFSG but rather on future available capacity at the spreading grounds. While projects C1 and C2 assume spreading at the MFSG, projects C3 and C4 assume injection into the basin in the Montebello Forebay.

Comment LACDPW-24

The comment states that for Projects C1, C2, C3, C4, Increased Replenishment at the Montebello Forebay, the comment states that on page 3-19 of the Draft PEIR should clarify that another AWT different from the one listed in the C0-A is proposed for use in Project C2. The comment further suggests that the AWT plant within Project C2 is otherwise redundant with CO-A.

Response LACDPW-24

In response to the comment, the text on page 3-19 of the Draft PEIR is revised to clarify that the AWT systems are different between the C0 and C2 projects.

Project C2 would require construction of an AWT facility within the Montebello Forebay to provide water for spreading at the MFSG, which would be a separate facility from the one proposed for Project C0.

Comment LACDPW-25

The comment states that the concept to use extraction wells located 0.5 mile away from the SGCSG in Project C6 to reduce groundwater ponding and thereby increasing spreading grounds storage capacity is not considered effective. Losses as high as the 17,000 AF would have to be bypassed along the Rio Hondo River. In that case, it is the inflow into the COE Whittier Narrows Dam that determines whether storm flows can be held for replenishment purposes. When the COE dam goes "Flood Control", which means the release of large flows for public protection, extraction wells will not serve their intended purpose.

Response LACDPW-25

The 17,000 AFY would be pumped and used by water purveyors in the Central Basin rather than bypassed along the Rio Hondo River. Coordination of operations between the COE, LACDPW, WRD and the relevant pumpers would be necessary to maximize the effectiveness of the GBOP project.

Comment LACDPW-26

The comment states that according to existing LACDPW Hydrologic Report records, an average of approximately 45,000 AF of reclaim and 24,000 AF of Import water was delivered to the Central Basin MFSG from 2000-2009 water years and since then the average reclaim and import water delivered (2010-2013) was approximately 52,000 and 9,000 AF respectively. The comment further states that this already represents a significant shift to increased pipeline flow directly in SGCSG, and that the addition of AWT flows (10,000 AF) does not seem feasible.

Response LACDPW-26

In considering recharge capacity of the MFSG, historical data were reviewed for all water supplies for water years 1971 through 2010, including stormwater, imported water, recycled water and releases from the upstream Whittier Narrows Dam. The maximum monthly quantity of water recharged exceeded 60,000 AF once, 40,000 AF a few months, and 30,000 AF in many months over this period. Based on a review of these historical spreading data, the short-term, back-to-back, maximum monthly recharge rate was assumed to be a no more than 45,000 acre-feet per month (AFM), limited to no more than 3 months, and the average “typical” operating recharge rate is set at a maximum of 15,000 AFM, to allow for routine drying and maintenance activities.

Comment LACDPW-27

The comment states that the documented SJRP pipeline flow into SGCSG from 2009 to present indicates that approximately 21,000 AF of reclaim has already been increased to the San Gabriel Coastal Spreading Grounds. These flows are from the existing SJRP. 10,000 AF of additional flows from the proposed AWT plant would represent a potential detrimental increase in water delivered to the facility, and not the replacement of one type of water in lieu of another. The comment suggests that the statement should be corrected to match existing and proposed conditions.

Response LACDPW-27

While projects C1 and C2 assume spreading of an additional 10,000 AFY at the MFSG beyond baseline (historical) operations, these projects would only be implemented if feasible. The GMBP analysis was based on historical operating data, as described in the response to comment LACDPW-26, above. An updated analysis of spreading grounds capacities in light of recent and proposed structural and operational changes (e.g., Spreading Grounds Interconnection Pipeline, San Gabriel River rubber dams, and Whittier Narrows Conservation Pool maximum elevation increase) would be needed prior to implementation of any projects that would provide additional replenishment flows to the MFSG.

Comment LACDPW-28

The comment states that Section 3.8, Required Approvals, page 3-29 should include approval from US Army Corp of Engineers for Section 408 Permit.

Response LACDPW-28

In response to the comment, the text on page 3-29 of the Draft PEIR is revised to clarify permit approvals.

Approving Agency	Approval
Implementing Agencies	CEQA approval
LA County Department of Public Works Flood Control	CEQA Approval Encroachment permit
Local Cities	Encroachment permits
US Army Corps of Engineers	Clean Water Act Section 404 Permit; <u>Rivers and Harbors Act 408 Permit</u>
California Department of Fish and Game	Streambed Alteration Agreement (1602)
Regional Water Quality Control Board	Clean Water Act Section 401 Water Quality Certification Waste Discharge Requirements for discharge to waters of the state or to land Groundwater Anti-Degradation Analysis Water Recycling Requirements NPDES permits for discharges to waters of the US Groundwater Recharge Recycled Water Project approval

Comment LACDPW-29

The comment states that Rudy Rivera can be contact if questions arise regarding comment numbers 1, 2, 4, 5, and 7 through 14.

Response LACDPW-29

The comment is noted for the record.

Comment LACDPW-30

The comment states that Richard Gomez can be contact if questions arise regarding comment numbers 3, 6 and 15.

Response LACDPW-30

The comment is noted for the record.

Comment LACDPW-31

The comment states the current Industrial General Permit was adopted in 2014. The Draft PEIR on page 4.8-15 states the General Permit was adopted in 1993.

Response LACDPW-31

In response to the comment, the Draft PEIR on page 4.8-15 is modified to correct the reference to the Industrial General Permit.

The current Industrial General Permit (Order No. ~~97-03-DWG, General Permit No. CAS000001~~ 2014-0057-DWQ) was ~~last adopted in April of 1992~~ approved on April 1,

~~2014, and went into effect on September 1, 2015 and applies to storm water associated with industrial operations, including sewage treatment systems.~~

~~A new Industrial General Permit has been drafted and subject to public review, and is expected to be adopted in July of 2013. Upon implementation of applicable proposed facilities, this updated permit will likely be in effect.~~ The new Industrial General Permit introduces several relevant changes. Firstly, the permit would require the implementation of all applicable and feasible minimum BMPs in combination with additional facility specific BMPs. The permit also requires that each facility has one staff or external personnel trained as a QISP (qualifying industrial storm water practitioner) to perform certain critical functions in order to ensure compliance. The new General Permit contains two types (annual and instantaneous maximum) numeric action levels (NALs) which serve as water quality thresholds for corrective action. If these are exceeded, agencies would be required to submit an Exceedance Response Action (ERA) report in which they evaluate their BMPs to ensure they meet best available technology (BAT) and best conventional pollutant control technology (BCT) standards. The permit would require dischargers to monitor for all components by which the receiving water body is impaired and requires treatment control BMPs to match design storm standards. The permit would provide an updated qualifying storm event (QSE) definition and also alters sampling protocols to allow a more reasonable time frame to gather initial discharge samples after the first QSE. The permit also would increase required sampling frequencies and do away with group monitoring (SWRCB, ~~2014~~2013).

Comment LACDPW-32

The comment states that Section 4.8 references eight major tributaries, but only mentions seven.

Response LACDPW-32

In response to the comment, the Draft PEIR on page 4.8-3 is modified to correct the number of tributaries.

The river has ~~eight~~ seven major tributaries: the Burbank Western Channel, Pacoima Wash, Tujunga Wash, Verdugo Wash, Arroyo Seco, Rio Hondo and Compton Creek.

Comment LACDPW-33

The comment states that the date and order number for the most recent Los Angeles County MS4 Permit should be modified on page 4.8-15.

Response LACDPW-33

In response to the comment, the Draft PEIR on page 4.8-15 is modified to reflect the correct Los Angeles County MS4 Permit date.

The Los Angeles County Municipal Separate Storm Sewer System (MS4) Permit ~~recently updated on December 28, 2012 (Order No. R4-2010-0175~~ R4-2012-0175 was amended in June 2015 under Order No. WQ 2015-0075.

Comment LACDPW-34

The comment states that the MS4 Permit applies to all construction activities including those greater than one acre, while the Draft PEIR on page 4.8-15 states that the MS4 Permit would apply to proposed construction activities disturbing less than an acre.

Response LACDPW-34

In response to the comment, the Draft PEIR on page 4.8-15 is modified to reflect the correct parameters of the Los Angeles County MS4 Permit.

The MS4 permit would apply to proposed construction activities disturbing ~~less~~ more than an acre and the operation of proposed pipelines, wells, storage tanks, spreading basins, and pump stations.

Comment LACDPW-35

The comment states if you have any other questions regarding environmental settings comments, please contact Richard Gomez.

Response LACDPW-35

The comment is noted.

Comment LACDPW-36

Regarding the Alternatives Analysis in the Draft PEIR, the comment suggests that WRD should inquire if the Enhance Watershed Management Programs (EWMP) groups or other storm water planning groups in the Central and West Coast Basins have alternative projects that could infiltrate onsite or be piped up to an unconfined aquifer to augment groundwater supplies. The comment also suggests that the GBMP should account for possible storm water infiltrated at sites with existing and proposed decentralized Green Infrastructure, Low Impact Development (LID), and Best Management Practice (BMPs), and model the storm water infiltrated at these various sites.

Response LACDPW-36

As explained in the Draft PEIR on page 7-1, CEQA Alternatives are specifically required to lessen the severity of significant impacts, not all impacts (less than significant, no impact, etc. identified in an EIR). The GBMP is a planning level document designed to meet WRD's stated goals for replenishment and storage. Other agencies may choose to implement storm water replenishment projects not included in the GBMP, subject to approval by the Watermaster Water Rights/Storage committees and subject to approval by the RWQCB. This is acknowledged, for example, in the EWMP for the Dominguez Channel Watershed Management Area Group (June 2015; page 4-39), which overlaps with WRD's service area and the GBMP study area.

Comment LACDPW-37

The comment states the GBMP should acknowledge recent storm water planning activities of other agencies, specifically the LA Basin Stormwater Conservation Study and EWMPs groups.

Response LACDPW-37

The LA Basin Stormwater Conservation Study is still ongoing, with the latest report completed in January 2016, after publication of the Draft PEIR. This study is primarily concerned with storm water management for purposes of flood control and water supply. There is potential for benefits to groundwater replenishment. This LA Basin Stormwater Conservation Study is not an alternative to the GBMP; as a planning level document, the GBMP does not include every conceivable storm water project in the basins. Projects based on those identified by partner agencies and those necessary to meet the goals of the GBMP are different from the projects and goals presented in the Conservation Study.

Comment LACDPW-38

The comment states if you have any other questions regarding environmental settings comments, please contact Richard Gomez.

Response LACDPW-38

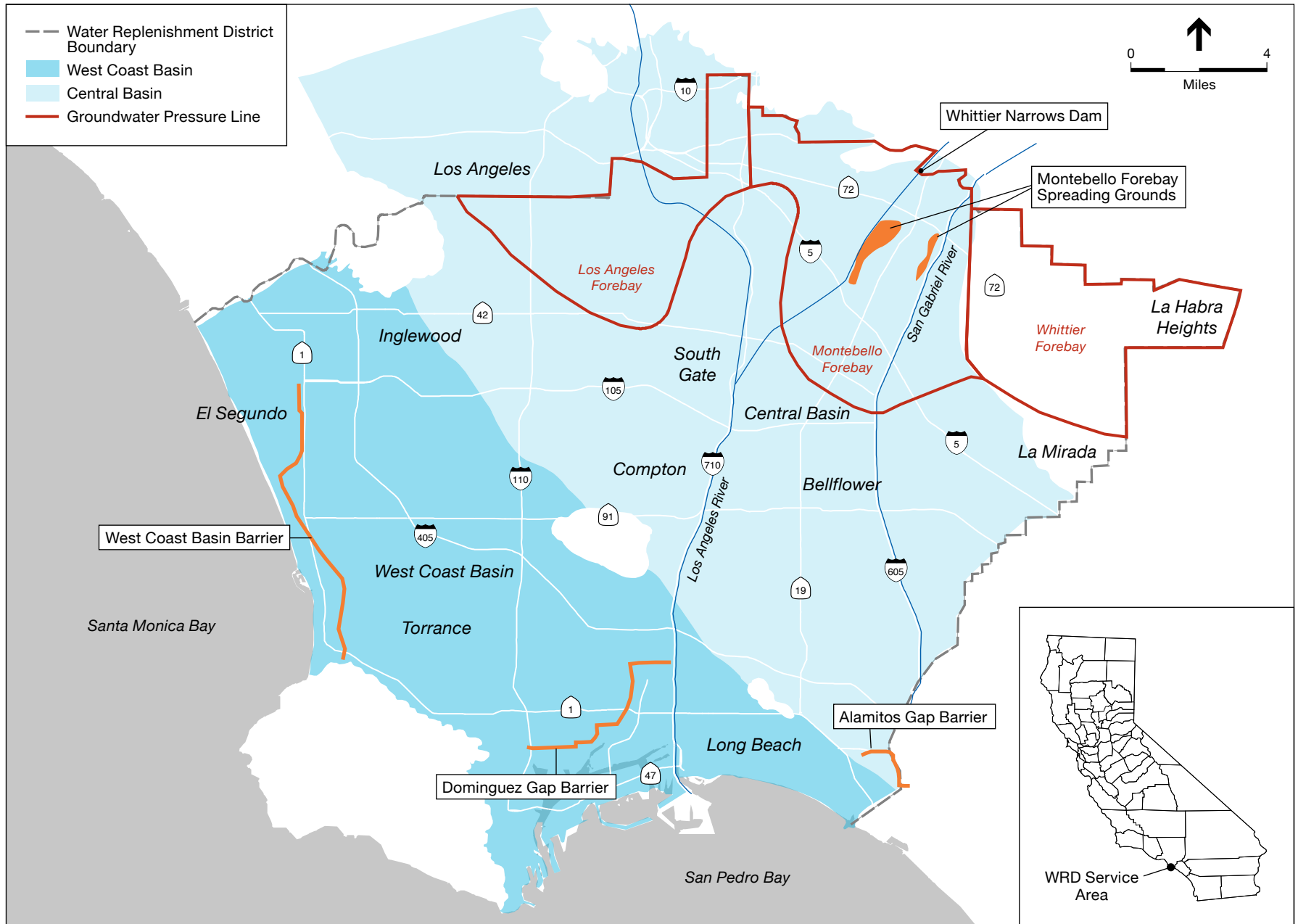
The comment is noted.

Comment LACDPW-39

The comment states if you have any other questions or require additional information, please contact Ruben Cruz of Land Development Division.

Response LACDPW-39

The comment is noted.



SOURCE: ESA, 2012.

WRD - Groundwater Basins Master Plan . 120192

Figure 2-2 Revised
Existing Replenishment Facilities

Plant List

46 matches found. [Click on scientific name for details](#)

Search Criteria

Rare Plant Rank is one of [1A, 1B, 2A, 2B, 3, 4], FESA is one of [Endangered, Threatened, Species of Concern, Not Listed], CESA is one of [Endangered, Threatened, Rare, Not Listed], Found in 9 Quads around 33118G4, Lifeform is one of [Tree, Shrub, Leaf succulent, Herb, Vine, Stem succulent, Lichen, Moss, Liverwort], Duration is one of [ann, per, ephem], Bloom Time is one of [January, February, March, April, May, June, July, August, September, October, November, December]

Scientific Name	Common Name	Family	Lifeform	Rare Plant Rank	State Rank	Global Rank
Abronia maritima	red sand-verbena	Nyctaginaceae	perennial herb	4.2	S3S4	G4
Aphanisma blitoides	aphanisma	Chenopodiaceae	annual herb	1B.2	S2	G3G4
Astragalus pycnostachyus var. lanosissimus	Ventura marsh milk-vetch	Fabaceae	perennial herb	1B.1	S1	G2T1
Astragalus tener var. titi	coastal dunes milk-vetch	Fabaceae	annual herb	1B.1	S1	G2T1
Atriplex coulteri	Coulter's saltbush	Chenopodiaceae	perennial herb	1B.2	S1S2	G3
Atriplex pacifica	South Coast saltscale	Chenopodiaceae	annual herb	1B.2	S2	G4
Atriplex parishii	Parish's brittle-scale	Chenopodiaceae	annual herb	1B.1	S1	G1G2
Atriplex serenana var. davidsonii	Davidson's saltscale	Chenopodiaceae	annual herb	1B.2	S1	G5T1
Calochortus catalinae	Catalina mariposa lily	Liliaceae	perennial bulbiferous herb	4.2	S4	G4
Calystegia peirsonii	Peirson's morning-glory	Convolvulaceae	perennial rhizomatous herb	4.2	S4	G4
Camissoniopsis lewisii	Lewis' evening-primrose	Onagraceae	annual herb	3	S4	G4
Centromadia parryi ssp. australis	southern tarplant	Asteraceae	annual herb	1B.1	S2	G3T2
Chaenactis glabruscula var. orcuttiana	Orcutt's pincushion	Asteraceae	annual herb	1B.1	S1	G5T1T2
Chenopodium littoreum	coastal goosefoot	Chenopodiaceae	annual herb	1B.2	S2	G2
Chorizanthe parryi var. fernandina	San Fernando Valley spineflower	Polygonaceae	annual herb	1B.1	S1	G2T1
Cistanthe maritima	seaside cistanthe	Montiaceae	annual herb	4.2	S3	G3G4
Convolvulus simulans	small-flowered morning-glory	Convolvulaceae	annual herb	4.2	S4	G4
Crossosoma californicum	Catalina crossosoma	Crossosomataceae	perennial deciduous shrub	1B.2	S3	G3
Deinandra paniculata	paniculate tarplant	Asteraceae	annual herb	4.2	S4	G4
Dichondra occidentalis	western dichondra	Convolvulaceae	perennial rhizomatous herb	4.2	S3S4	G3G4
Dithyrea maritima	beach spectaclepod	Brassicaceae	perennial rhizomatous herb	1B.1	S1	G1

Dudleya multicaulis	many-stemmed dudleya	Crassulaceae	perennial herb	1B.2	S2	G2
Dudleya virens ssp. insularis	island green dudleya	Crassulaceae	perennial herb	1B.2	S3	G3?T3
Eryngium aristulatum var. parishii	San Diego button-celery	Apiaceae	annual / perennial herb	1B.1	S1	G5T1
Erysimum insulare	island wallflower	Brassicaceae	perennial herb	1B.3	S3	G3
Erysimum suffrutescens	suffrutescent wallflower	Brassicaceae	perennial herb	4.2	S3	G3
Hordeum intercedens	vernal barley	Poaceae	annual herb	3.2	S3S4	G3G4
Horkelia cuneata var. puberula	mesa horkelia	Rosaceae	perennial herb	1B.1	S1	G4T1
Juncus acutus ssp. leopoldii	southwestern spiny rush	Juncaceae	perennial rhizomatous herb	4.2	S4	G5T5
Lasthenia glabrata ssp. coulteri	Coulter's goldfields	Asteraceae	annual herb	1B.1	S2	G4T2
Leptosyne maritima	sea dahlia	Asteraceae	perennial herb	2B.2	S1	G2
Lycium brevipes var. hassei	Santa Catalina Island desert-thorn	Solanaceae	perennial deciduous shrub	3.1	S1	G5T1Q
Lycium californicum	California box-thorn	Solanaceae	perennial shrub	4.2	S4	G4
Nama stenocarpa	mud nama	Boraginaceae	annual / perennial herb	2B.2	S1S2	G4G5
Navarretia fossalis	spreading navarretia	Polemoniaceae	annual herb	1B.1	S2	G2
Navarretia prostrata	prostrate vernal pool navarretia	Polemoniaceae	annual herb	1B.1	S2	G2
Nemacaulis denudata var. denudata	coast woolly-heads	Polygonaceae	annual herb	1B.2	S2	G3G4T2
Orcuttia californica	California Orcutt grass	Poaceae	annual herb	1B.1	S1	G1
Pentachaeta lyonii	Lyon's pentachaeta	Asteraceae	annual herb	1B.1	S1	G1
Phacelia hubbyi	Hubby's phacelia	Boraginaceae	annual herb	4.2	S4	G4
Phacelia ramosissima var. austrolitoralis	south coast branching phacelia	Boraginaceae	perennial herb	3.2	S3	G5?T3
Phacelia stellaris	Brand's star phacelia	Boraginaceae	annual herb	1B.1	S1	G1
Potentilla multijuga	Ballona cinquefoil	Rosaceae	perennial herb	1A	SX	GX
Suaeda esteroa	estuary seablite	Chenopodiaceae	perennial herb	1B.2	S2	G3
Suaeda taxifolia	woolly seablite	Chenopodiaceae	perennial evergreen shrub	4.2	S4	G
Symphyotrichum defoliatum	San Bernardino aster	Asteraceae	perennial rhizomatous herb	1B.2	S2	G2

Suggested Citation

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Search Criteria

Rare Plant Rank is one of [1A, 1B, 2A, 2B, 3, 4], FESA is one of [Endangered, Threatened, Species of Concern, Not Listed], CESA is one of [Endangered, Threatened, Rare, Not Listed], Found in 9 Quads around 33118H1, Lifeform is one of [Tree, Shrub, Leaf succulent, Herb, Vine, Stem succulent, Lichen, Moss, Liverwort], Duration is one of [ann, per, ephem], Bloom Time is one of [January, February, March, April, May, June, July, August, September, October, November, December]

Scientific Name	Common Name	Family	Lifeform	Rare Plant Rank	State Rank	Global Rank
Abronia villosa var. aurita	chaparral sand-verbena	Nyctaginaceae	annual herb	1B.1	S2	G5T2T3
Atriplex coulteri	Coulter's saltbush	Chenopodiaceae	perennial herb	1B.2	S1S2	G3
Atriplex parishii	Parish's brittlescale	Chenopodiaceae	annual herb	1B.1	S1	G1G2
Atriplex serenana var. davidsonii	Davidson's saltscale	Chenopodiaceae	annual herb	1B.2	S1	G5T1
Berberis nevinii	Nevin's barberry	Berberidaceae	perennial evergreen shrub	1B.1	S1	G1
California macrophylla	round-leaved filaree	Geraniaceae	annual herb	1B.2	S3?	G3?
Calochortus catalinae	Catalina mariposa lily	Liliaceae	perennial bulbiferous herb	4.2	S4	G4
Calochortus plummerae	Plummer's mariposa lily	Liliaceae	perennial bulbiferous herb	4.2	S4	G4
Calochortus weedii var. intermedius	intermediate mariposa lily	Liliaceae	perennial bulbiferous herb	1B.2	S2	G3G4T2
Calystegia felix	lucky morning-glory	Convolvulaceae	annual rhizomatous herb	3.1	SH	GHQ
Camissoniopsis lewisii	Lewis' evening-primrose	Onagraceae	annual herb	3	S4	G4
Centromadia parryi ssp. australis	southern tarplant	Asteraceae	annual herb	1B.1	S2	G3T2
Chloropyron maritimum ssp. maritimum	salt marsh bird's-beak	Orobanchaceae	annual herb (hemiparasitic)	1B.2	S1	G4?T1
Clinopodium mimuloides	monkey-flower savory	Lamiaceae	perennial herb	4.2	S3	G3
Convolvulus simulans	small-flowered morning-glory	Convolvulaceae	annual herb	4.2	S4	G4
Cuscuta obtusiflora var. glandulosa	Peruvian dodder	Convolvulaceae	annual vine (parasitic)	2B.2	SH	G5T4T5
Dudleya multicaulis	many-stemmed dudleya	Crassulaceae	perennial herb	1B.2	S2	G2
Helianthus nuttallii ssp. parishii	Los Angeles sunflower	Asteraceae	perennial rhizomatous herb	1A	SH	G5TH
Hordeum intercedens	vernal barley	Poaceae	annual herb	3.2	S3S4	G3G4
Horkelia cuneata var. puberula	mesa horkelia	Rosaceae	perennial herb	1B.1	S1	G4T1
Juglans californica	Southern California black walnut	Juglandaceae	perennial deciduous tree	4.2	S3	G3

Lasthenia glabrata ssp. coulteri	Coulter's goldfields	Asteraceae	annual herb	1B.1	S2	G4T2
Lepidium virginicum var. robinsonii	Robinson's pepper-grass	Brassicaceae	annual herb	4.3	S3	G5T3
Navarretia prostrata	prostrate vernal pool navarretia	Polemoniaceae	annual herb	1B.1	S2	G2
Nemacaulis denudata var. denudata	coast woolly-heads	Polygonaceae	annual herb	1B.2	S2	G3G4T2
Orcuttia californica	California Orcutt grass	Poaceae	annual herb	1B.1	S1	G1
Pentachaeta lyonii	Lyon's pentachaeta	Asteraceae	annual herb	1B.1	S1	G1
Phacelia hubbyi	Hubby's phacelia	Boraginaceae	annual herb	4.2	S4	G4
Phacelia ramosissima var. australitoralis	south coast branching phacelia	Boraginaceae	perennial herb	3.2	S3	G5?T3
Phacelia stellaris	Brand's star phacelia	Boraginaceae	annual herb	1B.1	S1	G1
Pseudognaphalium leucocephalum	white rabbit-tobacco	Asteraceae	perennial herb	2B.2	S2	G4
Quercus engelmannii	Engelmann oak	Fagaceae	perennial deciduous tree	4.2	S3	G3
Ribes divaricatum var. parishii	Parish's gooseberry	Grossulariaceae	perennial deciduous shrub	1A	SH	G4TH
Scutellaria bolanderi ssp. austromontana	southern mountains skullcap	Lamiaceae	perennial rhizomatous herb	1B.2	S3	G4T3
Sidalcea neomexicana	salt spring checkerbloom	Malvaceae	perennial herb	2B.2	S2	G4
Suaeda esteroa	estuary seablite	Chenopodiaceae	perennial herb	1B.2	S2	G3
Symphyotrichum defoliatum	San Bernardino aster	Asteraceae	perennial rhizomatous herb	1B.2	S2	G2
Symphyotrichum greatae	Greata's aster	Asteraceae	perennial rhizomatous herb	1B.3	S2	G2

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Scientific Name	Common Name	Family	Lifeform	Rare Plant Rank	State Rank	Global Rank
Arenaria paludicola	marsh sandwort	Caryophyllaceae	perennial stoloniferous herb	1B.1	S1	G1
Astragalus brauntonii	Braunton's milk-vetch	Fabaceae	perennial herb	1B.1	S2	G2
Astragalus pycnostachyus var. lanosissimus	Ventura marsh milk-vetch	Fabaceae	perennial herb	1B.1	S1	G2T1
Atriplex serenana var. davidsonii	Davidson's saltscale	Chenopodiaceae	annual herb	1B.2	S1	G5T1
Calochortus catalinae	Catalina mariposa lily	Liliaceae	perennial bulbiferous herb	4.2	S4	G4
Calochortus plummerae	Plummer's mariposa lily	Liliaceae	perennial bulbiferous herb	4.2	S4	G4
Calystegia felix	lucky morning-glory	Convolvulaceae	annual rhizomatous herb	3.1	SH	GHQ
Camissoniopsis lewisii	Lewis' evening-primrose	Onagraceae	annual herb	3	S4	G4
Centromadia parryi ssp. australis	southern tarplant	Asteraceae	annual herb	1B.1	S2	G3T2
Convolvulus simulans	small-flowered morning-glory	Convolvulaceae	annual herb	4.2	S4	G4
Dudleya multicaulis	many-stemmed dudleya	Crassulaceae	perennial herb	1B.2	S2	G2
Helianthus nuttallii ssp. parishii	Los Angeles sunflower	Asteraceae	perennial rhizomatous herb	1A	SH	G5TH
Horkelia cuneata var. puberula	mesa horkelia	Rosaceae	perennial herb	1B.1	S1	G4T1
Juglans californica	Southern California black walnut	Juglandaceae	perennial deciduous tree	4.2	S3	G3
Nasturtium gambelii	Gambel's water cress	Brassicaceae	perennial rhizomatous herb	1B.1	S1	G1
Phacelia hubbyi	Hubby's phacelia	Boraginaceae	annual herb	4.2	S4	G4
Pseudognaphalium leucocephalum	white rabbit-tobacco	Asteraceae	perennial herb	2B.2	S2	G4
Symphyotrichum defoliatum	San Bernardino aster	Asteraceae	perennial rhizomatous herb	1B.2	S2	G2

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CHAPTER 12

Corrections and Additions to the Draft PEIR

This chapter contains a compilation of revisions made to the text of the Draft Program Environmental Impact Report (PEIR) by the Water Replenishment District of Southern California (WRD) as the Lead Agency, in response to the comments received during the 60-day public review period. All revisions are previously introduced in Chapter 11 of this Final PEIR but are summarized here for convenience of the reader. Where the responses indicate additions or deletions to the text of the Draft PEIR, additions are indicated in underline and deletions in ~~strikeout~~.

Chapter ES: Executive Summary

Page ES-17:

HYDRO-1: Implementation of a Grading and Drainage Plan. Prior to construction of project facilities, the implementing agencies shall prepare a grading and drainage plan that identifies anticipated changes in flow that would occur on site and minimizes any potential increases in discharge, erosion, or sedimentation potential in accordance with applicable regulations and requirements for the County of Los Angeles and/or the city in which the facility would be located. In addition, all new drainage facilities shall be designed in accordance with standards and regulations set forth in the Hydrology Manual of the Los Angeles County Department of Public Works and the Low Impact Development Ordinance Manual from the Los Angeles County Department of Public Works. The plan shall identify and implement retention basins, best management practices, and other measures to ensure that potential increases in storm water flows and erosion would be minimized, in accordance with local requirements.

Chapter 2:

Page 2-4:

The Alamitos Gap Barrier Project (AGBP) is a seawater intrusion barrier that injects imported water (provided by the City of Long Beach) and advanced treated recycled water (provided by the Leo Vander Lans Plant ~~Long Beach Water Reclamation Plant~~) as the Leo Vander Lans Plant takes the tertiary treated water from Long Beach Water Reclamation and further treats it to supply the AGBP into 43 wells located along the coastal border between Los Angeles and Orange Counties. It has been in operation since 1964. The barrier system is owned by Los Angeles County Department of Public Works and Orange County Water District, operated, and maintained by the Los Angeles County Department of Public Works (LACDPW).

The Dominguez Gap Barrier Project consists of ~~41~~ 94 injection wells spaced over four miles along the Dominguez Channel. It has been in operation since 1969 and also utilizes ~~both potable and~~ advanced treated recycled water provided by the Los Angeles Department of Water and Power (LADWP) City of Los Angeles and the potable water is supplied by the West Basin Municipal District. LADWP on occasion substitute diluent water when they have issues meeting treatment demand to assure a steady flow into the barrier. Both barrier systems are shown on Figure 2-1. ~~These two~~ The barrier systems are solely ~~also~~ owned, operated, and maintained by LACDPW ~~similar to the Alamitos Gap Barrier Project.~~”

Page 2-5:

Figure 2-2 has been revised and is included at the end of this chapter.

Page 2-6:

Both barrier systems are shown on **Figure 2-12**.

Page 2-8:

~~**Groundwater Improvement Reliability Project**~~ **Groundwater Reliability Improvement Project**

Chapter 3: Project Description

Page 3-2:

**TABLE 3-1 REVISED
GENERAL GEOGRAPHIC LOCATIONS FOR PROPOSED PROJECTS**

Basin	Cities
West Coast Basin	Los Angeles, El Segundo, Carson, Unincorporated Los Angeles County
Central Basin	Los Angeles, Huntington Park, Vernon, Bell, Cudahy, South Gate, Maywood, Bellflower, Downey, Pico Rivera, Industry, Cerritos, Norwalk, Lakewood, Long Beach Unincorporated Los Angeles County

Page 3-10:

A footnote has been added to Table 3-3 to clarify maximum production rates:

Footnote 1: The numbers stated under the “Production” column reflect existing maximum production rates.

Page 3-11:

In the West Coast Basin, direct injection is currently used to recharge the groundwater basin in addition to preventing seawater intrusion. As shown in Figure 3-1, direct injection facilities are currently located at the West Coast Basin Barrier Project (WCBBP) and the Dominguez Gap Barrier Project (DGBP). The Draft GBMP includes utilization of these barrier projects to increase replenishment opportunities as well as development of new injection wells in the West Coast Basin. Both systems are aging and may require rehabilitation of the pipeline networks and wells in order to achieve maximum design rates.

Page 3-12:

**TABLE 3-4
PROPOSED SEAWATER INTRUSION BARRIER RECYCLED WATER INJECTION INCREASES (AFY)**

	Existing Treatment Capacity	Additional Injection under Concept A	Total under Concept A	Additional Injection under Concept B	Total under Concept B
West Coast Basin Barrier Project	17,000	15,500	32,500	7,500	40,000
Dominguez Gap Barrier Project	5,000	2,500	7,500	7,500	13,000 <u>15,000</u>

Page 3-18:

~~**Groundwater Improvement Reliability Project**~~ **Groundwater Reliability Improvement Project**

Page 3-19**Groundwater Improvement Reliability Project (Project C0)**

The Draft GBMP includes GRIP, which has already been evaluated under CEQA but not yet built. The cumulative environmental effects of operating GRIP together with other GBMP project are evaluated in this PEIR. As the CEQA Lead Agency, WRD certified the Final Environmental Impact Report (EIR) for GRIP on June 18, 2015. A technical analysis conducted for the GRIP project is also included in this PEIR as **Appendix C**. As described in the Final EIR, GRIP will replace the current use of 21,000 AFY of imported water at the MFSG with a combination of both tertiary-treated and AWT recycled water for groundwater replenishment. Approximately 11,000 AFY of tertiary-treated recycled water produced by LACSD's San Jose Creek WRP will be conveyed to the MFSG for recharge via an existing underground outfall pipeline. In addition, WRD will construct an

AWT plant to produce 10,000 AFY of AWT recycled water for recharge at the MFSG. This AWT recycled water will be conveyed from the new Advanced Water Treatment Facility in the City of Pico Rivera to the MFSG for recharge using the existing underground outfall pipeline referenced above.

Page 3-19:

Project C2 would require construction of an AWT facility within the Montebello Forebay to provide water for spreading at the MFSG, which would be a separate facility from the one proposed for Project C0.

Page 3-29:

Approving Agency	Approval
Implementing Agencies	CEQA approval
LA County Department of Public Works Flood Control	CEQA Approval
Local Cities	Encroachment permit
US Army Corps of Engineers	Encroachment permits
California Department of Fish and Game	Clean Water Act Section 404 Permit; <u>Rivers and Harbors Act 408 Permit</u>
Regional Water Quality Control Board	Streambed Alteration Agreement (1602)
	Clean Water Act Section 401 Water Quality Certification
	Waste Discharge Requirements for discharge to waters of the state or to land
	Groundwater Anti-Degradation Analysis
	Water Recycling Requirements
	NPDES permits for discharges to waters of the US
	Groundwater Recharge Recycled Water Project approval

Chapter 4: Environmental Settling, Impacts, and Mitigation Measures

Page 4.1-7

With the exception of the Satellite AWTF under Project C10, proposed treatment facilities would be located at or adjacent to existing treatment plants, including ECLWRF, TIWRP, JWPCP, SJCWRP, and LCWRP. Agencies operating existing treatment plants will evaluate specific requests for proposed on-site treatment facilities by WRD and other partner agencies.

Page 4.3-10:

Once constructed, all pipelines would be located underground and no operational impacts would occur. All other project construction, with the exception of the proposed satellite AWTF, would occur within existing facilities where operational impacts would be similar to existing conditions. Implementation of Project C5 ARRF would result in the diversion of up to 5,000 AFY from Reach 2 of the Los Angeles River during high flow periods. Downstream of this diversion point, the Los Angeles River is a concrete-lined channel. Thus, no significant impacts to biological resources associated with this diversion would be expected. Also, as documented in Chapter 4.8 Surface Hydrology and Water Quality, these sections of the river are listed on the state 303(d) list for impairment due to metals, nutrients, pathogens, pesticides, organics, sediment toxicity, and trash (see page 4.8-22). Diversion of storm flows from the river would slightly reduce this pollutant loading to the lower reaches, which may provide a benefit to any biological resources. As individual GBMP projects are implemented, the potential for operations to affect flows in any drainage will be identified as part of subsequent environmental analysis once preliminary design is complete. All subsequent environmental review documentation would be sent to CDFW for review and comment. No impacts to biological resources due to operation of the proposed facilities would occur.

Page 4.7-3:**Hazardous Materials and Waste**Page 4.7-3:

A hazardous ~~material~~ waste is defined by 22 CCR Section 66261.10 as a substance or combination of substances that may cause or significantly contribute to an increase in serious, irreversible, or incapacitating illness or death or may pose a substantial ~~presence~~ present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed.

Page 4.7-6:

RCRA is considered a “cradle to grave” statute for hazardous wastes in that it addresses all aspects of hazardous materials from creation to disposal. California is authorized by the USEPA to implement RCRA and is responsible for regulating generators, treatment, storage and disposal facilities, and management of hazardous waste.

Page 4.7-9:

California regulations specify specific cleanup actions that must be taken by a hazardous waste transporter in the event of a discharge or spill, and for the safe packaging and transport of hazardous wastes. All transporters of hazardous waste are required to participate in the California Highway Patrol’s Biennial Inspection of Terminal Program.

Page 4.7-10:

The California Division of Occupational Safety and Health (CalOSHA), the regulatory agency responsible for ensuring worker safety, also enforces hazard communication program regulations, which contain worker safety training and hazard information requirements, such as procedures for identifying and labeling hazardous substances, communicating hazard information relating to hazardous substances and their handling, and preparation of health and safety plans to protect workers.

Page 4.7-19:

Operation of expanded treatment plant facilities under both Concept A and Concept B, including the proposed Satellite AWTF (Concept B, Project C10), would require routine transport and use of new chemicals for purposes of producing advanced treated recycled water. The implementing agency shall be required to comply with all relevant and applicable federal, State and local laws and regulations that pertain to the transport, storage, and use of hazardous materials during operation of proposed facilities. For example, gasoline and other hazardous materials may be required to be contained in USDOT-approved containers for storage and transport; secondary containment of hazardous materials may be required in storage areas; contingency plans may be required to define responses to accidental release of hazardous materials including containment and remediation actions. Compliance with these laws would minimize the potential hazard to the public or environment due to routine transport, storage, and use of hazardous materials. Impacts would be less than significant under both Concept A and Concept B.

Page 4.7-19:

Construction of the proposed project could result in the exposure of construction workers and nearby residents to potentially contaminated soils (e.g., volatile organic compounds) or groundwater due to improper use, storage, or disposal of hazardous materials and/or leakage from underground storage tanks or other chemical containers on site. Implementation of **Mitigation Measure HAZ-1** and **HAZ-2** would reduce these potentially hazardous impacts from construction activities to a less than significant level under Concept A and Concept B.

Page 4.8-3:

The river has ~~eight~~ seven major tributaries: the Burbank Western Channel, Pacoima Wash, Tujunga Wash, Verdugo Wash, Arroyo Seco, Rio Hondo and Compton Creek.

Page 4.8-10:

An NPDES permit is required for all projects that disturb one or more acre of land. Therefore, the proposed project would require an NPDES permit from the ~~LADWQCB~~ SWRCB.

Page 4.8-14:

Dischargers whose projects disturb one or more acres of ~~soil~~ land, or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the general permit for discharges of storm water associated with construction activity.

The current Industrial General Permit (Order No. ~~97-03-DWG, General Permit No. CAS000001~~ 2014-0057-DWQ) was ~~last adopted in April of 1992~~ approved on April 1, 2014, and went into effect on September 1, 2015 and applies to storm water associated with industrial operations, including sewage treatment systems.

~~A new Industrial General Permit has been drafted and subject to public review, and is expected to be adopted in July of 2013. Upon implementation of applicable proposed facilities, this updated permit will likely be in effect.~~ The new Industrial General Permit introduces several relevant changes. Firstly, the permit would require the implementation of all applicable and feasible minimum BMPs in combination with additional facility specific BMPs. The permit also requires that each facility has one staff or external personnel trained as a QISP (qualifying industrial storm water practitioner) to perform certain critical functions in order to ensure compliance. The new General Permit contains two types (annual and instantaneous maximum) numeric action levels (NALs) which serve as water quality thresholds for corrective action. If these are exceeded, agencies would be required to submit an Exceedance Response Action (ERA) report in which they evaluate their BMPs to ensure they meet best available technology (BAT) and best conventional pollutant control technology (BCT) standards. The permit would require dischargers to monitor for all components by which the receiving water body is impaired and requires treatment control BMPs to match design storm standards. The permit would provide an updated qualifying storm event (QSE) definition and also alters sampling protocols to allow a more reasonable time frame to gather initial discharge samples after the first QSE. The permit also would increase required sampling frequencies and do away with group monitoring (SWRCB, ~~2014~~2013).

Page 4.8-15:**Statewide NPDES Permit for Caltrans**

The California Department of Transportation (Caltrans) is responsible for the design, construction, management, and maintenance of the State highway system, including freeways, bridges, tunnels, Caltrans' facilities, and related properties, and is subject to

the permitting requirements of Clean Water Act section 402(p). Caltrans' discharges consist of storm water and non-storm water discharges from State owned rights-of-way.

Before July 1999, discharges from Caltrans' MS4 were regulated by individual NPDES permits issued by the Regional Water Boards. On July 15, 1999, the State Water Board issued a statewide permit (Order No. 99-06-DWQ) which regulated all discharges from Caltrans MS4s, maintenance facilities and construction activities. On September 19, 2012, the Department's permit was re-issued (Order No. 2012-0011-DWQ) and became effective on July 1, 2013.

Caltrans' Storm Water Management Plan (SWMP) describes the procedures and practices used to reduce or eliminate the discharge of pollutants to storm drainage systems and receiving waters. Since storm water discharges from MS4s are highly variable in frequency, intensity, and duration, and it is difficult to characterize the amount of pollutants in the discharges, the inclusion of BMPs in lieu of numeric effluent limitations is appropriate in storm water permits. Order No. 2012-0011-DWQ requires implementation of BMPs to control and abate the discharge of pollutants in storm water. To assist in determining if the BMPs are effectively achieving standards, Order No. 2012-0011-DWQ requires effluent and receiving water monitoring. The monitoring data will be used to determine the effectiveness of the applied BMPs and to make appropriate adjustments or revisions to BMPs that are not effective.

Page 4.8-15:

The Los Angeles County Municipal Separate Storm Sewer System (MS4) Permit ~~recently updated on December 28, 2012~~ (Order No. ~~R4-2010-0175~~ R4-2012-0175) was amended in June 2015 under Order No. WQ 2015-0075.

Page 4.8-15:

The MS4 permit would apply to proposed construction activities disturbing ~~less~~ more than an acre and the operation of proposed pipelines, wells, storage tanks, spreading basins, and pump stations.

Page 4.8-16:

The discharger, which would be the applicable municipal permittee based on GBMP project location, would be required to prepare a Monitoring and Reporting Program (MRP), which includes outfall-based storm water monitoring data (where storm water exits the facility), wet and dry weather receiving water monitoring data, outfall-based non-storm water monitoring data and regional studies.

Page 4.8-16:

Each discharger is required to implement a Planning and Land Development Program (Order No. R4-2012-0175) pertaining to MS-4 discharges within the coastal watersheds of Los Angeles County, which requires new projects to:

- Lessen the water quality impacts of development by using smart growth practices such as compact development, directing development towards existing communities via infill or redevelopment, and safeguarding of environmentally sensitive areas.
- Minimize the adverse impacts from storm water runoff on the biological integrity of Natural Drainage Systems and the beneficial uses of water bodies in accordance with requirements under CEQA (Cal. Pub. Resources Code § 21000 et seq.).
- Minimize the percentage of impervious surfaces on land developments by minimizing soil compaction during construction, designing projects to minimize the impervious area footprint, and employing Low Impact Development (LID) design principles to mimic predevelopment hydrology through infiltration, evapotranspiration and rainfall harvest and use.
- Maintain existing riparian buffers and enhance riparian buffers when possible.
- Minimize pollutant loadings from impervious surfaces such as roof tops, parking lots, and roadways through the use of properly designed, technically appropriate BMPs (including Source Control BMPs such as good housekeeping practices), LID Strategies, and Treatment Control BMPs.
- Properly select, design and maintain LID and Hydromodification Control BMPs to address pollutants that are likely to be generated, reduce changes to pre-development hydrology, assure long-term function, and avoid the breeding of vectors²⁵.
- Prioritize the selection of BMPs to remove storm water pollutants, reduce storm water runoff volume, and beneficially use storm water to support an integrated approach to protecting water quality and managing water resources in the following order of preference: (a) On-site infiltration, bioretention and/or rainfall harvest and use. (b) On-site biofiltration, off-site ground water replenishment, and/or off-site retrofit.

Page 4.8-16:

Los Angeles County Low Impact Development Ordinance

The County of Los Angeles has prepared the 2014 Low Impact Development Standards Manual to comply with the requirements of the NPDES MS4 Permit for storm water and non-storm water discharges from the MS4 within the coastal watersheds of Los Angeles County (CAS004001, Order No. R4- 2012-0175). The LID Standards Manual provides guidance for the implementation of storm water quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from storm water and non-storm water discharges.

Page 4.8-23:

HYDRO-1: Implementation of a Grading and Drainage Plan. Prior to construction of project facilities, the implementing agencies shall prepare a grading and drainage plan that identifies anticipated changes in flow that would occur on site and minimizes any potential increases in discharge, erosion, or sedimentation potential in accordance with applicable regulations and requirements for the County of Los Angeles and/or the city in which the facility would be located. In addition, all new drainage facilities shall be designed in accordance with standards and regulations set forth in the Hydrology Manual of the Los Angeles County Department of Public Works and the Low Impact Development Ordinance Manual from the Los Angeles County Department of Public Works. The plan shall identify and implement retention basins, best management practices, and other measures to ensure that potential increases in storm water flows and erosion would be minimized, in accordance with local requirements.

Page 4.12-16:

Treatment plant upgrades would occur entirely within the boundaries of existing facilities or on adjacent lands and thus would not directly impact roadways or require lane closures. Agencies operating existing treatment plants will evaluate specific requests for proposed on-site treatment facility upgrades by WRD and other partner agencies.

Page 4.13-6

Puente Hills Landfill

~~The Puente Hills Landfill is a Class III landfill located in unincorporated Los Angeles County. The facility is one of the largest landfills in the nation. The landfill first established the use of environmental control systems, such as those designed to protect air quality and groundwater that have now been modeled throughout California and the nation (LACSD 2013). The Puente Hills Landfill disposes of approximately 2,638,000 tons of waste from the cities of Los Angeles (8%), Carson (6%), Industry (4%), “Others”~~

(66%) and Unincorporated Los Angeles County (16%) (County of Los Angeles, 2011). The current capacity of the landfill is 26.4 million cubic yards (LACSD, 2012).

Puente Hills Material Recovery Facility

The Puente Hills Material Recovery Facility (MRF) is located in unincorporated Los Angeles County, next to the now closed Puente Hills Landfill. The Puente Hills MRF is owned and operated by the Sanitation Districts. The purpose of the Puente Hills MRF is to provide waste diversion and publicly-owned transfer capacity for Los Angeles County. The facility is permitted to accept 4,400 tons per day and 24,000 tons per week of municipal solid waste. The receipt of liquid or hazardous waste is not allowed.

Page 4.13-18

In addition, the ~~Puente Hills Landfill~~ Puente Hills MRF would have sufficient capacity to receive solid waste generated during construction of the proposed project. The ~~Puente Hills Landfill~~ Puente Hills MRF is located outside the northeastern boundary of WRD's service area near the SJCWRP and accommodates all forms of solid waste. The current capacity of the landfill is 26.4 million cubic yards (LACSD, 2012). With implementation of UTIL-1 and UTIL-2, impacts to landfill capacity would be less than significant.

The ~~Puente Hills Landfill~~ Puente Hills MRF is a Class III landfill that would be available to serve the proposed project.

Page 4.13-23

~~Sanitation Districts of Los Angeles County, Puente Hills Landfill Annual Report, November 2012.~~

Personal Communication. Sanitation Districts of Los Angeles County staff member. March 10, 2016.

Chapter 5: Cumulative Impacts

**TABLE 5-2
RELATED PROJECTS**

Project Name	Project Type / Location	Project Sponsor	Project Status
Transportation Projects			
Interstate 5 Improvement Projects in Southern Los Angeles	Create HOV lanes, mixed flow lanes, interchange modifications, pedestrian overcrossings, and frontage road modification.	Caltrans	Construction 2012 to 2016 <u>2018</u> .
I-10/I-605 Direct Connector	Construction of a direct connector fly-over to ease traffic congestion from southbound I-605 and eastbound I-10.	Caltrans	Construction completed by 2015 <u>Complete</u>

**TABLE 5-2
RELATED PROJECTS**

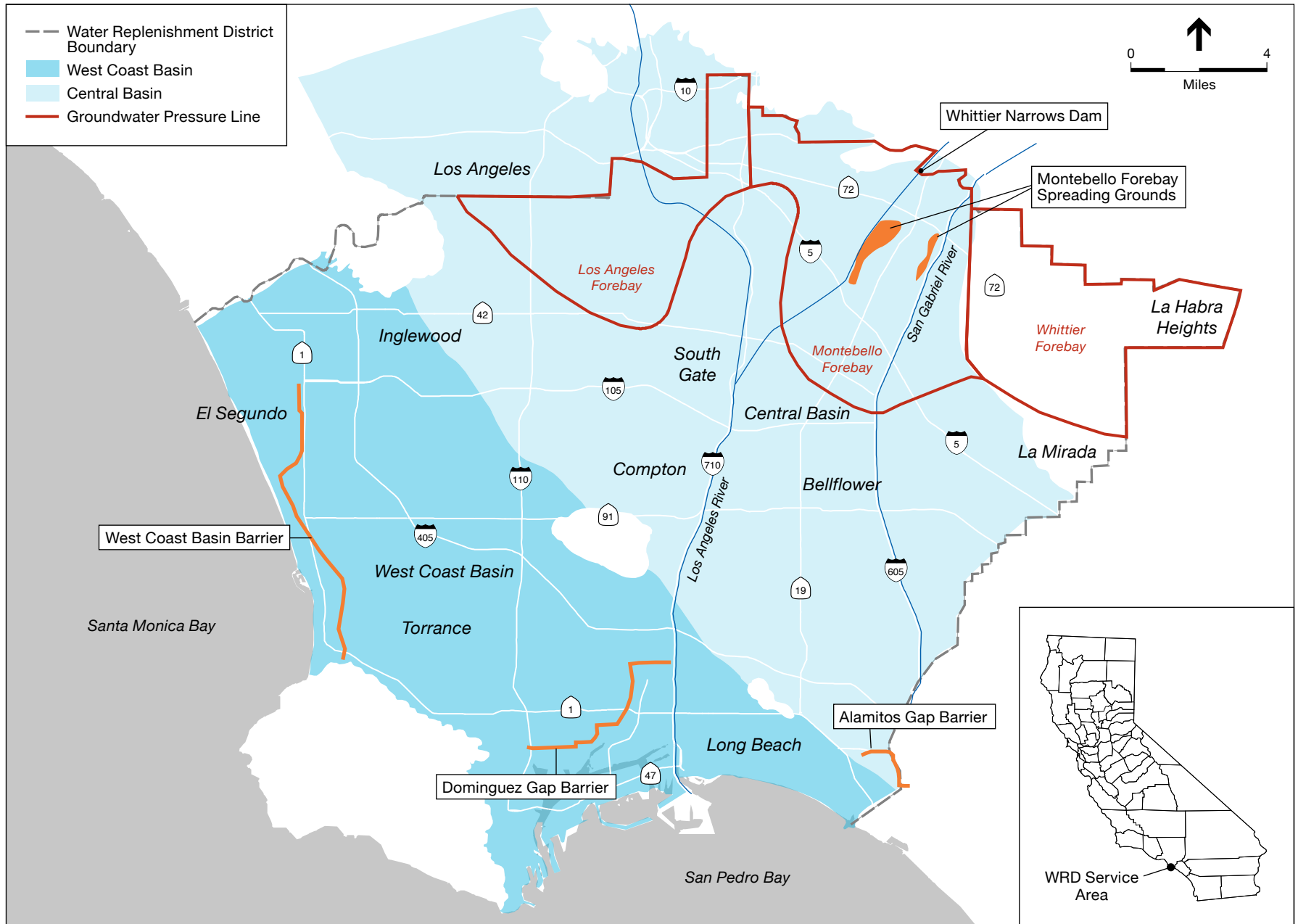
Project Name	Project Type / Location	Project Sponsor	Project Status
I-105 Modification and upgrade of pumping/filtration system	I-105 westbound between Paramount Blvd and Garfield Ave.	Caltrans	<u>Planning</u> <u>Unknown</u>
I-105 and I-110	Pavement and culvert repair at the I-105 and I-110 Interchange	Caltrans	<u>Planning</u> <u>Unknown</u>
SR 47 Schuyler Heim Bridge Replacement	Replacement of bridge with a fixed-span bridge structure, providing a permanent navigable channel and no traffic delays due to bridge lifting.	Caltrans	Construction from 2011 to 2017
Long Beach Freeway (I 710) Pavement Rehabilitation Project	Installing precast concrete panels and concrete slabs in various traffic lanes and locations, upgrading median barrier, and constructing maintenance pullouts along route.	Caltrans	Construction from 2012 to 2016

SOURCES: City of Los Angeles Department of Public Works, Uniform Project Reporting System (UPRS) Project Reports, 2015; City of Compton, *Urban Water Management Plan*, 2005; City of Los Angeles, *Water Integrated Resources Plan 5-Year Review FINAL Document*, 2012; City of Vernon, *Urban Water Management Plan*, 2011; Caltrans, 2015; Los Angeles World Airports 2015; Cities of Bell, Carson, Cudahy, Downey, El Segundo, Industry, Long Beach, Norwalk, Pico Rivera, South Gate, Vernon, 2015

Chapter 7: Alternatives Analysis

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In addition, local landfills such as ~~Puente Hills Landfill~~ Puente Hills MRF have sufficient capacity to receive construction and operational solid wastes and serve the project over its lifetime.



SOURCE: ESA, 2012.

WRD - Groundwater Basins Master Plan . 120192

Figure 2-2 Revised
Existing Replenishment Facilities

CHAPTER 13

Mitigation Monitoring and Reporting Program

CEQA Requirements

Section 15091(d) and Section 15097 of the CEQA Guidelines require a public agency to adopt a program for monitoring or reporting on the changes it has required in the project or conditions of approval to substantially lessen significant environmental effects. This Mitigation Monitoring and Reporting Program (MMRP) summarizes the mitigation commitments identified in the Water Replenishment District of Southern California (WRD) Groundwater Basins Master Plan (proposed project; GBMP) Program EIR (State Clearinghouse No. 2012091035). Mitigation measures are presented in the same order as they occur in the Final PEIR.

The columns in the MMRP table provide the following information:

- **Mitigation Measure(s):** The action(s) that will be taken to reduce the impact to a less-than-significant level.
- **Implementation, Monitoring, and Reporting Action:** The appropriate steps to implement and document compliance with the mitigation measures.
- **Responsibility:** The agency or private entity responsible for ensuring implementation of the mitigation measure. However, until the mitigation measures are completed, WRD, as the CEQA Lead Agency, remains responsible for ensuring that implementation of the mitigation measures occur in accordance with the MMRP (CEQA Guidelines, Section 15097(a)).
- **Monitoring Schedule:** The general schedule for conducting each task, either prior to construction, during construction and/or after construction.

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
Aesthetics			
<p>AES-1: Aboveground buildings/structures shall be designed to be consistent with the aesthetic qualities of existing structures in the vicinity to minimize contrasting features.</p>	<ul style="list-style-type: none"> • Include mitigation measure in project design specifications. • Ensure design specifications are included in construction contractor specifications. • Retain copies of design and contractor specifications in project files. • Perform site inspections to verify contractor compliance. Retain inspection records in the project file. 	<p>Implementing Agencies; Construction Contractor</p>	<p>Before Construction</p>
<p>AES-2: During project design, a landscape plan shall be prepared for aboveground facilities that restores disturbed areas and minimizes effects to scenic vistas.</p>	<ul style="list-style-type: none"> • Include mitigation measure in project design specifications. • Ensure design specifications are included in construction contractor specifications. • Retain copies of design and contractor specifications in project files. • Perform site inspections to verify contractor compliance. Retain inspection records in the project file. 	<p>Implementing Agencies; Construction Contractor</p>	<p>Before Construction</p>
<p>AES-3: After construction of GBMP project is complete, disturbed areas, including pipeline alignments, construction easements, and staging areas, shall be restored similar to preconstruction conditions.</p>	<ul style="list-style-type: none"> • Include mitigation measure in project design specifications. • Ensure design specifications are included in construction contractor specifications. • Retain copies of design and contractor specifications in project files. • Perform site inspections to verify contractor compliance. Retain inspection records in the project file. 	<p>Implementing Agencies; Construction Contractor</p>	<p>Before and After Construction</p>

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p>AES-4: Lighting used during nighttime construction shall be shielded and pointed away from surrounding light-sensitive land uses.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of contractor specifications in project files. • Perform site inspections to verify contractor compliance. Retain inspection records in the project file. 	Implementing Agencies; Construction Contractor	During Construction
<p>AES-5: All new permanent exterior lighting associated with proposed project components shall be shielded and directed downward to avoid any light spill onto neighboring lands or into nighttime skies.</p>	<ul style="list-style-type: none"> • Include mitigation measure in project design specifications. • Ensure design specifications are included in construction contractor specifications. • Retain copies of design and contractor specifications in project files. • Perform site inspections to verify contractor compliance. Retain inspection records in the project file. 	Implementing Agencies; Construction Contractor	Before, During and After Construction
Air Quality			
<p>AQ-1: The following mitigation measures shall be incorporated to minimize emissions of NOx associated with construction activities for the proposed project:</p> <ul style="list-style-type: none"> • Construction activities shall require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) to the extent feasible. Under conditions where it is determined that 2010 model year or newer diesel trucks are not readily available or obtainable for a project, the implementing agency shall be required to provide this evidence to WRD and shall instead use trucks that meet USEPA 2007 model year NOx emissions requirements. • Off-road diesel-powered construction equipment greater than 50 horsepower shall meet Tier 3 emissions standards at a minimum and the Tier 4 where available. Under conditions where it is determined that equipment meeting Tier 4 emission standards are not readily available or obtainable for a project, the implementing agency shall be required to provide this evidence to WRD and shall instead use USEPA Tier 3 equipment. 	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of contractor specifications in project files. • Perform site inspections to verify contractor compliance. Retain inspection records in the project file. 	Implementing Agencies; Construction Contractor	Before and During Construction

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p>AQ-2: The implementing agency for each individual GBMP project shall require by contract specifications that:</p> <ul style="list-style-type: none"> Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use to avoid excessive idling. Construction operations shall minimize use of diesel-powered generators and rely on the electricity infrastructure where feasible. Construction trucks shall be routed away from congested streets or sensitive receptor areas where feasible. 	<ul style="list-style-type: none"> Include mitigation measure in construction contractor specifications. Retain copies of contractor specifications in project files. Perform site inspections to verify contractor compliance. Retain inspection records in the project file. 	Implementing Agencies; Construction Contractor	Before and During Construction
<p>AQ-3: Prior to approval of an individual GBMP project, a project-specific LST analysis that identifies the resulting construction emissions shall be prepared using either SCAQMD's LST screening tables (for projects that are less than five acres) or dispersion modeling (for projects that exceed five acres in size). Where it is determined that construction emissions would exceed the applicable LSTs or the most stringent applicable federal or state ambient air quality standards, the GBMP project shall reduce its daily construction intensity (e.g., reducing the amount of equipment used daily, reducing the amount of soil graded/excavated daily, etc.) to a level where the GBMP project's construction emissions would no longer exceed SCAQMD's LSTs or result in pollutant emissions that would cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards.</p>	<ul style="list-style-type: none"> Retain copies of the LST analysis in the project file. Include mitigation measure in construction contractor specifications if emissions exceed applicable LSTs; project shall reduce construction activity to applicable level. Retain copies of correspondence with contractor in the project file. Prepare reports to document any changes construction changes made. 	Implementing Agencies; Construction Contractor	Before and During Construction
<p>AQ-4: All new or upgraded water treatment facilities associated with the proposed project shall prepare and implement an Odor Control Maintenance and Monitoring Plan that would define a schedule for the regular maintenance of the facility's odor control equipment, a schedule for odor monitoring along the treatment facility's property boundary, and establish a protocol for handling and resolving odor complaints.</p>	<ul style="list-style-type: none"> Retain copies of the Odor Control Maintenance and Monitoring Plan in the project file. Perform site inspections to verify regular maintenance compliance. Retain records in the project file. 	Implementing Agencies	After Construction
Biological Resources			
<p>BIO-1: Prior to ground disturbing activities in areas that could support sensitive biological resources; a habitat assessment shall be conducted by a qualified biologist to determine the potential for special-status wildlife species to occur within affected areas. If the habitat assessment determines that a special-status species has the potential to be present within a minimum of 500 feet of the construction zone, a focused survey shall be conducted by a qualified biologist prior to project implementation to determine presence or absence of special-status species.</p>	<ul style="list-style-type: none"> Include mitigation measure in construction contractor specifications. Retain copies of the survey(s) in the project file. Prepare reports to document any species relocation activities, and retain such reports in the project file. 	Implementing Agencies; Construction Contractor	Before Construction

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p>BIO-2: If a special-status wildlife species is determined present or potentially present within the limits of construction activities, a qualified biologist shall conduct pre-construction surveys of proposed work zones and the 500-foot buffer around each area within 14 days prior to ground disturbing activities. Any potential habitat capable of supporting a special-status wildlife species, such as burrows, shall be flagged for avoidance, as necessary; any additional habitat features, if any, shall also be identified and flagged as necessary.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of the survey(s) in the project file. • Prepare reports to document any special status species or potential habitat, and avoidance measures, and retain such reports in the project file. 	Implementing Agencies; Construction Contractor	Before Construction
<p>BIO-3: If avoidance of special-status species is not feasible, implementing agencies shall consult with the appropriate regulating agency (USFWS or CDFW) to determine a strategy for compliance with the Endangered Species Act (ESA) including development of mitigation and/or compensation for the impact.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of the survey reports in the project file. • Retain copies of correspondence with CDFW in the project file. • Prepare reports to document any strategies for compliance with ESA, and retain such reports in the project file. 	Implementing Agencies; Construction Contractor	Before Construction
<p>BIO-4: Every effort shall be made to avoid potential impacts to special-status wildlife species by eliminating construction activities to the greatest extent possible within areas where those species are detected through surveys. Tunneling or jack and bore construction methods under drainages that may support listed special-status wildlife species shall be recommended in areas where those species have the potential to occur or where presence has been confirmed. Similarly, silt fencing or similar impermeable barriers to exclude small wildlife species from entering the active work areas shall be installed around work areas that occur within or adjacent to undisturbed habitats, or near areas of documented occurrences of special-status wildlife. Such impermeable barriers shall be verified by a qualified biologist prior to initiating construction activities.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Perform construction site inspections to ensure any measures decided upon are implemented properly. • Retain copies of construction site inspection logs in the project file. 	Implementing Agencies; Construction Contractor	Before and During Construction
<p>BIO-5: All construction areas, staging areas, and right-of-ways shall be staked, flagged, fenced, or otherwise clearly delineated to restrict the limits of construction to the minimum necessary near areas that may support special-status wildlife species as determined by a qualified biologist.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Perform construction site inspections to ensure any measures decided upon are implemented properly. • Retain copies of construction site inspection logs in the project file. 	Implementing Agencies; Construction Contractor	Before and During Construction
<p>BIO-6: Prior to construction in areas that could support special status plants, a qualified botanist shall conduct a pre-construction floristic inventory and focused rare plant survey of project areas to determine and map the location and extent of special-status plant species populations within disturbance areas. This survey shall occur during the typical blooming periods of special-status plants with the potential to occur. The plant survey shall follow the CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (November 24, 2009).</p>	<ul style="list-style-type: none"> • A qualified botanist will conduct pre-construction surveys for special status plants as defined. • Prepare documentation to record results of the pre-construction survey. • Retain copies of pre-construction survey documentation in the project file. 	Implementing Agencies; Construction Contractor	Before Construction

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p>BIO-7: The limits of construction shall be staked, flagged, fenced, or otherwise clearly delineated to avoid and minimize impacts on adjacent habitats that may support special-status plant species.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Perform construction site inspections to ensure compliance with construction limits. • Retain copies of construction site inspection logs in the project file. 	Implementing Agencies; Construction Contractor	Before and During Construction
<p>BIO-8: To the extent feasible, the implementing agencies shall avoid and/or reduce the footprint of construction and staging areas in areas having potential occurrences of special-status plant species.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Perform construction site inspections to ensure any measures decided upon are implemented properly. • Retain copies of construction site inspection logs in the project file. 	Implementing Agencies; Construction Contractor	Before and During Construction
<p>BIO-9: If temporary construction-related impacts to special-status plant populations are identified within a disturbance area, the implementing agencies shall prepare and implement a special-status species salvage and replanting plan. The salvage and replanting plan shall include measures to salvage, replant, and monitor the disturbance area until native vegetation is re-established under the direction of CDFW and USFWS.</p>	<ul style="list-style-type: none"> • Retain copies of the special-status species salvage and replanting plan in the project file. • Perform monitoring in accordance with plan and retain copies of monitoring logs and reports in the project file. • Retain copies of correspondence with CDFW in the project file. 	Implementing Agencies; Construction Contractor	Before and After Construction
<p>BIO-10: Prior to construction, a qualified wetland delineator shall be retained to conduct a formal wetland delineation in areas where potential jurisdictional resources (i.e., wetlands or drainages) may be affected by the project. If jurisdictional resources are identified in the project area and would be directly or indirectly impacted by individual projects, the qualified wetland delineator shall prepare a jurisdictional delineation report outlining mitigation and compensation requirements to be implemented prior to construction.</p>	<ul style="list-style-type: none"> • A qualified wetland delineator will conduct pre-construction surveys where potential jurisdictional resources may be affected by the project • Prepare documentation to record results of the survey and if necessary, the wetland delineator will prepare a jurisdictional delineation report. • If a jurisdictional delineation report is prepared, then implement mitigation and compensation requirements as appropriate. • Retain copies of survey, jurisdictional delineation, and monitoring and reporting associated with any mitigation/compensation in the project file. 	Implementing Agencies; Construction Contractor	Before Construction
<p>BIO-11: Proposed projects shall avoid impacting previously undisturbed areas where possible. This would include employing tunneling or jack and bore methods under drainages if practicable. The construction zone(s) shall be modified if feasible to minimize disturbance of any wetland or drainage.</p>	<ul style="list-style-type: none"> • Include mitigation measure in project design specifications. • Ensure design specifications are included in construction contractor specifications. • Retain copies of design and contractor specifications in 	Implementing Agencies; Construction Contractor	Before and During Construction

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
	<ul style="list-style-type: none"> project files. • Perform site inspections to verify contractor compliance if construction zones must be modified. • Retain inspection records in the project file. 		
<p>BIO-12: Where jurisdictional wetlands and other waters cannot be avoided, a restoration plan shall be prepared that provides for replanting and monitoring for a minimum three-year period following construction to ensure riparian and/or wetland habitat is re-established.</p>	<ul style="list-style-type: none"> • Retain copies of the restoration plan and associated monitoring reports in the project file • Retain copies of correspondence with resource agencies in the project file 	Implementing Agencies; Construction Contractor	After Construction
<p>BIO-13: If construction and vegetation removal is proposed between February 1 and August 31, then a qualified biologist shall conduct a pre-construction survey for breeding and nesting birds within 500-feet of the construction limits to determine and map the location and extent of breeding birds that could be affected by the project. Active nest sites located during the pre-construction surveys shall be avoided and a non-disturbance buffer zone shall be established sufficient to avoid demonstrable harassment of the nesting birds. Nest sites shall be avoided until the adults and young are no longer reliant on the nest site for survival as determined by a qualified biologist.</p>	<ul style="list-style-type: none"> • A qualified biologist will conduct pre-construction surveys for breeding and nesting birds • Prepare documentation to record results of the survey in the project files • Perform construction site inspections to ensure any buffer zones are implemented properly. • Retain copies of construction site inspection logs in the project file. 	Implementing Agencies; Construction Contractor	Before and During Construction
<p>BIO-14: All active bird nest buffer areas shall be clearly demarcated with stakes, flag, or fence material. The installation of buffer areas shall be verified by a qualified biologist prior to the initiation of ground disturbance activities.</p>	<ul style="list-style-type: none"> • A qualified biologist will verify the installation of any necessary active bird nest buffers • Record buffer specifications and save in the project files • Perform construction site inspections to ensure any buffer zones are implemented properly. • Retain copies of construction site inspection logs in the project file. 	Implementing Agencies; Construction Contractor	Before Construction
<p>BIO-15: A qualified biologist shall conduct a survey for bat roost sites prior to the initiation of any construction activities in areas where potential roost sites may occur, such as abandoned structures, bridges, or hollow trees. If a bat roost is identified, a non-disturbance buffer zone shall be established sufficient to avoid demonstrable harassment by a qualified biologist or as otherwise determined in consultation with the CDFW.</p>	<ul style="list-style-type: none"> • A qualified biologist will conduct pre-construction surveys for bat roost sites • Prepare documentation to record results of the survey in the project files • A non-disturbance buffer zone will be established where potential roost sites may exist • Perform construction site inspections to ensure any buffer zones are implemented properly. • Retain copies of construction site inspection logs in the project file. • Retain copies of correspondence with CDFW in the 	Implementing Agencies; Construction Contractor	Before Construction

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
	project file		
<p>BIO-16: If trees could be impacted by project construction, an arborist shall conduct a tree survey. If any Oak trees or other protected trees will be impacted by the proposed project, the implementing agency shall obtain any required County or City permits as directed by the arborist.</p>	<ul style="list-style-type: none"> • A qualified arborist will conduct pre-construction tree survey • Prepare documentation to record results of the survey in the project files • If Oak or other protected trees will be impacted, a County or City permit will be obtained by the implementing agency • Retain copies of correspondence with permits and arborist in the project file 	Implementing Agencies; Construction Contractor	Before Construction
Cultural Resources			
<p>CUL-1a: For project components that require ground disturbance, the implementing agency shall conduct a cultural resources records search at the appropriate information center. A field survey will be conducted where deemed appropriate by a qualified archaeologist. The qualified archaeologist shall document the cultural records assessment and recommend whether additional investigation or monitoring is warranted.</p> <p>CUL-1b: For project components that affect existing structures that are 50 years old or greater, the implementing agency shall determine the need for a project-specific historic architectural study. If warranted, an architectural historian shall identify and evaluate potentially affected historic resources (eligible for the National Register, California Register, or local designation) prior to project implementation.</p> <p>CUL-1c: The implementing agency shall avoid impacts, if feasible, on identified cultural resources that are eligible for listing in the National Register, California Register, or local designation, or that qualify as a unique archaeological resource under CEQA, including prehistoric and historic archaeological sites, locations of importance to Native Americans, human remains, and historical buildings, structures and landscapes. Methods of avoidance may include, but should not be limited to project re-route, re-design, or identification of protection measures such as capping or fencing. If avoidance is determined not to be feasible, then a qualified archaeologist shall develop and implement a cultural resources treatment plan. The treatment plan shall include provisions for analysis of data in a regional context, curation of artifacts and data at an approved facility, and dissemination of prepared reports.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of all cultural research and survey reports in the project file. • Perform site inspections to ensure compliance with cultural sensitivity requirements. • Retain inspection forms in the project file. 	Implementing Agencies; Construction Contractor	Before and During Construction
<p>CUL-2: If human remains are encountered unexpectedly during construction excavation and grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 48 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then identify the designated Most Likely Descendent of the deceased Native American, who will engage</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • In the event that human remains are discovered, documentation of the assessment of the significance of the find will be prepared and retained in the project file 	Implementing Agencies; Construction Contractor	During Construction

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
in consultation to determine the disposition of the remains.			
<p>CUL-3: For projects implemented under the GBMP that involve ground disturbance, the implementing agency shall determine the necessity of conducting a study of the project area(s) based on the potential sensitivity of the project site for paleontological resources. If deemed necessary, the paleontologist shall conduct a paleontological resources inventory designed to identify potentially significant resources. The paleontologist shall provide recommendations regarding additional investigation or monitoring activities.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • In the event that paleontological resources are discovered, documentation of the assessment of the significance of the find will be prepared and retained in the project file • Paleontological monitoring reports and logs will be retained in project file. 	Implementing Agencies; Construction Contractor	Before and During Construction
Geology, Soils, and Seismicity			
<p>GEO-1: Prior to construction of each GBMP Project, a design-level geotechnical investigation, including collection of site specific subsurface data if appropriate, shall be completed. The geotechnical evaluation shall identify all potential seismic hazards including fault rupture, and characterize the soil profiles, including liquefaction potential and expansive soil potential. The geotechnical investigation shall recommend site-specific design criteria to mitigate for seismic hazards, such as special foundations and structural setbacks, and these recommendations shall be incorporated into the design of individual proposed projects.</p>	<ul style="list-style-type: none"> • Retain copies of the geotechnical investigation in the project file. • Implementing agencies shall verify that recommendations have been incorporated into the project design prior to initiation of the project. • Include the geotechnical report as part of the construction documents. • Perform site inspections to ensure contractor compliance with geotechnical report recommendations. 	Implementing Agencies; Construction Contractor	Before Construction
<p>GEO-2: WRD shall continue groundwater level monitoring throughout the West Coast Basin and Central Basin to identify areas of elevated groundwater levels. WRD and the Watermaster Storage Panel shall ensure that, where necessary, future groundwater recharge projects in the Central Basin are designed with groundwater monitoring capabilities sufficient to evaluate and minimize impact of shallow groundwater to habitable structures in areas with liquefiable soils.</p>	<ul style="list-style-type: none"> • WRD will maintain a repository of groundwater level monitoring results and reports. • WRD and Watermaster Storage Panel shall maintain a repository of approvals for future projects. 	WRD	Before, During, and After Construction
<p>GEO-3: In conjunction with Mitigation Measures GEO-1, prior to construction and where appropriate, the design-level geotechnical investigation shall identify potential geologic hazards, including sinkholes, subsidence, and soil corrosivity, and characterize the soil profiles for their potential to lead to the aforementioned hazards. The geotechnical investigation shall recommend site-specific design criteria to mitigate for geologic hazards, such as avoidance of problem areas and special foundations and structural setbacks. These recommendations shall be incorporated into the design of individual proposed projects.</p>	<ul style="list-style-type: none"> • Retain copies of the geotechnical investigation in the project file. • Verify that recommendations have been incorporated into the project design prior to initiation of the project. • Include the geotechnical report as part of the construction documents. • Perform site inspections to ensure contractor compliance with geotechnical report recommendations. 	Implementing Agencies; Construction Contractor	Before Construction

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p>GEO-4: WRD shall continue to monitor groundwater levels throughout the Central Basin to identify where groundwater levels in the Central Basin reach historically low levels. If monitoring data show that groundwater levels have reached historically low levels in areas susceptible to subsidence, WRD and the Watermaster Storage Panel shall work with implementing agencies reduce pumping in these areas to prevent subsidence from occurring.</p>	<ul style="list-style-type: none"> WRD will maintain a repository of groundwater level monitoring results and reports. WRD and Watermaster Storage Panel shall work with implementing agencies to prevent subsidence from occurring. Retain copies of specific groundwater pumping reductions and correspondence in the project file. 	Implementing Agency; WRD	Before, During, and After Construction
Hazards and Hazardous Materials			
<p>HAZ-1: Contingency Plan for Contaminated Soil or Groundwater. Prior to commencement of construction requiring excavation, the implementing agency shall require its construction contractor to consult with appropriate regulatory agencies to prepare a Contingency Plan that outlines how to dispose of any contaminated soil or groundwater that may be encountered during construction. If contaminated soil and/or groundwater are encountered or if suspected contamination is encountered during project construction, work shall be halted in the area, and the Contingency Plan shall be implemented.</p>	<ul style="list-style-type: none"> Include mitigation measure in construction contractor specifications. Retain a construction monitor to verify contractor compliance with the contingency plan. Retain copies of the contingency plan and records verifying implementation of the plan in the project file. 	Implementing Agencies; Construction Contractor	Before and During Construction
<p>HAZ-2: Hazardous Materials Management Spill Prevention and Control Plan. Before commencement of construction activities requiring the storage of hazardous materials on site, the implementing agency shall require its construction contractor to prepare a Hazardous Materials Management Spill Prevention and Control Plan that includes a project-specific contingency plan for hazardous materials and waste operations. The Plan shall be applicable to all construction activities, and shall establish policies and procedures according to federal and California OSHA regulations for hazardous materials. Elements of the Plan shall include, but not be limited to the following:</p> <ul style="list-style-type: none"> A discussion of hazardous materials management, including delineation of hazardous material storage areas, access and egress routes, waterways, emergency assembly areas, and temporary hazardous waste storage areas; Notification and documentation of procedures; and Spill control and countermeasures, including employee spill prevention/response training. 	<ul style="list-style-type: none"> Include mitigation measure in construction contractor specifications. Retain copies of the Plan and records verifying implementation of the Plan in the project file. 	Implementing Agencies; Construction Contractor	Before and During Construction

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p>HAZ-3: Conduct Environmental Site Assessments. Prior to the initiation of any construction requiring ground-disturbing activities, the implementing agencies shall complete Phase I Environmental Site Assessments (ESA) for soil and groundwater contamination in the project areas. The recommendations set forth in the Phase I ESA shall be implemented to the satisfaction of applicable agencies before and during construction. If the Phase I ESA indicates the potential for hazardous concentrations of contamination within the construction zone, Phase II studies will be completed before construction begins. Phase II studies shall include soil and groundwater sampling and analysis for anticipated contaminants. The Phase II sampling is intended to identify how to dispose of any potentially harmful material from excavations, and to determine if construction workers need specialized personal protective equipment.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Results of the assessment shall be documented and retained in the project file. • Construction site inspections shall be performed to ensure contractor compliance with identified plans to avoid or remediate hazards. • Retain copies of construction inspection logs or reports in the project file. 	<p>Implementing Agencies; Construction Contractor</p>	<p>Before and During Construction</p>
Hydrology and Water Quality			
<p>HYDRO-1: Implementation of a Grading and Drainage Plan. Prior to construction of project facilities, the implementing agencies shall prepare a grading and drainage plan that identifies anticipated changes in flow that would occur on site and minimizes any potential increases in discharge, erosion, or sedimentation potential in accordance with applicable regulations and requirements for the County of Los Angeles and/or the city in which the facility would be located. In addition, all new drainage facilities shall be designed in accordance with standards and regulations set forth in the Hydrology Manual of the Los Angeles County Department of Public Works. The plan shall identify and implement retention basins, best management practices, and other measures to ensure that potential increases in storm water flows and erosion would be minimized, in accordance with local requirements.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Prepare grading and drainage plan under applicable County/City regulations and requirements • Retain copies of the plan and records verifying implementation of the plan in the project file. 	<p>Implementing Agencies; Construction Contractor</p>	<p>Before and During Construction</p>
Groundwater			
<p>GW-Q1: WRD and implementing agencies shall continue to conduct groundwater quality monitoring near seawater barrier injection wells for Concept A projects. Monitored constituents shall include, but not be limited to, those required by the RWQCB recycled water permits. The monitoring results shall be made publically available.</p>	<ul style="list-style-type: none"> • WRD will maintain a repository of groundwater quality monitoring results and reports, and makes this information available to the public. • WRD will ensure monitoring complies with RWQCB requirements 	<p>Implementing Agency; WRD</p>	<p>After Construction</p>

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p>GW-Q2: The Watermaster Storage Panel shall ensure that implementing agencies of Concept B projects follow the review and approval provisions described in the Judgment and that adequate monitoring is provided to ensure no material physical harm.</p>	<ul style="list-style-type: none"> WRD and implementing agency shall continue ground water quality monitoring. Watermaster Storage Panel shall insure that implementing agency follows the review and approval provisions under Judgement. Retain copies of monitoring results and processes in project file. Retain copies of Watermaster Storage panel correspondence and approval in project file. 	Implementing Agency; WRD	After Construction
<p>GW-Q3: In the event that groundwater monitoring detects elevated concentrations of TDS, wastewater indicator contaminants, naturally occurring contaminants, or other legacy contaminants, WRD and the Watermaster Storage Panel shall ensure that implementing agencies coordinate measures to protect drinking water quality that could include AWT system modifications, injection system modifications, production wellhead treatment, blending of injection water with other water sources, production well relocation, or provision of alternative water supplies to the affected water purveyor.</p>	<ul style="list-style-type: none"> WRD and the Watermaster Storage Panel shall ensure that implementing agencies coordinate measures and author plans to protect drinking water quality WRD shall verify any measures and plans are approved by applicable jurisdictions Retain copies of all correspondence and plans in the project file. 	Implementing Agency ; WRD	After Construction
<p>GW-Q4: WRD and the Watermaster Storage Panel shall ensure that implementing agencies monitor travel times between injection locations and production wells as required by the RWQCB. If monitoring determines that retention times are insufficient to meet permit requirements, WRD and the Watermaster Storage Panels shall coordinate with implementing agencies to inactivate affected wells until recharge activities can be managed to restore appropriate retention times.</p>	<ul style="list-style-type: none"> WRD and the Watermaster Storage Panel shall ensure that implementing agencies monitor travel times between injection locations and production wells WRD shall verify all monitoring complies with RWQCB regulations and guidelines WRD and Watermaster Storage Panels may coordinate with implementing agencies to inactivate affected wells WRD will verify all affected wells are inactivated Retain copies of all correspondence with implementing agency, site visit information, and monitoring in the project files. 	Implementing Agency; WRD	After Construction
<p>GW-Q5: WRD shall continue to conduct groundwater quality monitoring near the MFSG and ABP. Monitored constituents shall include, but not be limited to, those required by the RWQCB recycled water permits including TDS, metals, and wastewater indicator constituents. The monitoring results will be made publically available.</p>	<ul style="list-style-type: none"> WRD will maintain a repository of groundwater quality monitoring results and reports, and makes this information available to the public. WRD and implementing agency shall document that groundwater quality monitoring meets RWQCB requirements. 	WRD	Before, During, and After Construction

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
GW-Q6: WRD and the Watermaster Storage Panel shall require that future groundwater recharge projects are designed with groundwater monitoring capabilities sufficient to evaluate water quality in proximity to the recharge areas. The groundwater monitoring program will be approved by the RWQCB or SWRCB DDW.	<ul style="list-style-type: none"> WRD shall maintain copies of approved monitoring programs for future projects that meet requirements for evaluating groundwater quality. 	WRD	Before Construction
GW-Q7: WRD and the Watermaster Storage Panel shall ensure that groundwater levels are monitored and managed in areas of known contamination to avoid mobilizing naturally occurring and/or anthropogenic contaminants	<ul style="list-style-type: none"> WRD shall review groundwater monitoring programs to ensure such programs are sufficient to meet requirements for evaluating groundwater quality and avoiding mobilization of contamination. WRD shall maintain copies of approved monitoring programs for future projects. 	WRD	After Construction
GW-L1: Prior to installing new injection or extraction well fields for Concept B projects, WRD and the Watermaster Storage Panel shall ensure that implementing agencies conduct groundwater modeling near the affected areas sufficient to estimate extraction and injection capacities at specific locations and to avoid impacts to neighboring production well operations.	<ul style="list-style-type: none"> WRD shall review groundwater modeling reports for Concept B projects to ensure neighboring wells will not be adversely affected. WRD shall retain copies of groundwater modeling reports for Concept B projects. 	WRD	Before Construction
GW-L2: WRD shall continue to monitor groundwater levels throughout the West Coast Basin and Central Basin to identify areas of elevated groundwater levels. WRD and the Watermaster Storage Panel shall ensure that, where necessary, future Concept B groundwater recharge projects are designed with groundwater monitoring capabilities sufficient to evaluate and minimize impacts of shallow groundwater on subsurface and surface infrastructure.	<ul style="list-style-type: none"> WRD will maintain a repository of groundwater level monitoring results and reports. WRD shall review groundwater monitoring programs for future Concept B recharge projects to ensure such programs are sufficient to identify shallow groundwater impacts. WRD shall retain copies of groundwater monitoring programs for future Concept B projects. 	WRD	After Construction
Land Use and Planning			
LU-1: For project components occurring within an AIA, the implementing agencies shall submit their proposed project plans to the Los Angeles County ALUC for review and comment prior to final design	<ul style="list-style-type: none"> Implementing agencies shall submit project plans to the Los Angeles County ALUC for program components within the AIA. Incorporate comments from the ALUC into final design. Retain documentation of correspondence with the ALUC in the project file. 	Implementing Agencies	Before Construction
LU-2: Implementing agencies shall conduct siting studies to determine the most suitable locations to place facilities, taking into consideration surrounding land uses. Siting studies shall consider existing and planned land uses in the vicinity of the project. Projects shall be located in areas with compatible neighboring land uses wherever possible.	<ul style="list-style-type: none"> Retain documentation of all siting studies in project files 	Implementing Agencies	Before Construction

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p>LU-3: Implementing agencies shall obtain encroachment permits, easements, conditional use permits (CUPs), or variances as required from local agencies with jurisdiction over project sites, as required. Implementing agencies shall comply with all terms and conditions of such permits.</p>	<ul style="list-style-type: none"> Retain documentation of all correspondence and permits, easements, and variances in project files 	<p>Implementing Agencies</p>	<p>Before Construction</p>
Noise			
<p>NOISE-1: The implementing agencies shall implement the following measures during construction:</p> <ul style="list-style-type: none"> Include design measures where feasible to reduce the construction noise levels if necessary to comply with local noise ordinances. These measures may include, but are not limited to, the erection of noise barriers/curtains, use of advanced or state-of-the-art mufflers on construction equipment, and/or reduction in the amount of equipment that would operate concurrently at the construction site. Place noise and groundborne vibration-generating construction activities whose specific location on a construction site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) as far as possible from the nearest noise- and vibration-sensitive land uses such as residences, schools, and hospitals. Minimize the effects of equipment with the greatest peak noise generation potential via shrouding or shielding to the extent feasible. Examples include the use of drills, pavement breakers, and jackhammers. Locate stationary construction noise sources as far from adjacent noise-sensitive receptors as possible, and require that these noise sources be muffled and enclosed within temporary sheds, insulation barriers if necessary to comply with local noise ordinances.. Provide noise shielding and muffling devices on construction equipment per the manufacturer's specifications. If construction is to occur near a school, the construction contractor shall coordinate the with school administration in order to limit disturbance to the campus. Efforts to limit construction activities to non-school days shall be encouraged. For major construction projects, identify a liaison for surrounding residents and property owners to contact with concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at construction locations. For major construction projects, notify in writing all landowners and occupants of properties adjacent to the construction area of the anticipated construction schedule at least two weeks prior to groundbreaking. 	<ul style="list-style-type: none"> Include mitigation measure in construction contractor specifications. Appoint a construction monitor to verify contractor compliance with noise measures. Retain copies of monitoring records in the project file. Appoint a Noise Concern Coordinator to respond to construction noise complaints. Maintain log of concerns filed with the Coordinator and the resolution of each complaint. Retain copies of the notification and concern log in the project file Retain copies of notifications to all landowners and occupants of properties 	<p>Implementing Agencies; Construction Contractor</p>	<p>Before and During Construction</p>

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p>NOISE-2: For construction activities during non-standard working hours or hours that are not exempt from compliance with applicable city or county noise ordinances (e.g., 24-hour well drilling), the implementing agency will secure a noise waiver from the appropriate jurisdiction if available.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Initiate correspondence with the appropriate jurisdiction for noise waiver • Retain copies of the correspondence and waiver in the project file. 	<p>Implementing Agencies; Construction Contractor</p>	<p>During Construction</p>
<p>NOISE-3: Injection and extraction wells shall be located as far from sensitive receptors as feasible. If new wells are to be constructed in the immediate vicinity of sensitive receptors, construction specification requirements shall include installation and maintenance of a temporary noise barrier (e.g. engineered sound wall or noise blanket) during 24-hour construction activities, to the extent feasible if necessary to comply with local noise ordinances. Specifications shall include use of appropriate materials that shall be installed to a height that intercepts the line of sight between the construction site and sensitive receptors in order to achieve maximum attenuation in an attempt to decrease construction area noise to as close as ambient noise levels as possible.</p>	<ul style="list-style-type: none"> • Include mitigation measure in project design specifications. • Include mitigation measure in construction contractor specifications. • Verify contractor compliance with injection and extraction well locations. • Retain copies of well location and construction specifications in the project file. • Install temporary noise barrier as required. Perform construction site inspections to ensure compliance with noise ordinances. • Retain copies of site inspection logs or reports in project files. 	<p>Implementing Agencies; Construction Contractor</p>	<p>Before and During Construction</p>
<p>NOISE-4: The implementing agencies shall require that all GBMP-related aboveground facilities that include stationary noise generating equipment (such as emergency generators, blowers, pumps, motors, etc.) minimize their audible noise levels by locating equipment away from noise-sensitive receptor areas, installing proper acoustical shielding for the equipment, and incorporating the use of parapets into building design to meet the applicable city or county noise level requirements at neighboring property lines.</p>	<ul style="list-style-type: none"> • Include mitigation measure in project design specifications. • Ensure design specifications are included in construction contractor specifications. • Retain copies of design and contractor specifications in project files. • Perform site inspections to verify contractor compliance. Retain inspection records in the project file. 	<p>Implementing Agencies; Construction Contractor</p>	<p>Before and After Construction</p>

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p>NOISE-5: The implementing agencies shall require the construction contractor(s) to implement the following measure:</p> <ul style="list-style-type: none"> Ensure that the operation of construction equipment that generates high levels of vibration including, but not limited to, large bulldozers, loaded trucks, and drilling rigs, is minimized within 45 feet of existing residential structures and 35 feet of institutional structures (e.g., schools) during construction of the various GBMP projects. Use of small rubber-tired bulldozers shall be encouraged within these areas during grading operations to reduce vibration effects. 	<ul style="list-style-type: none"> Include mitigation measure in construction contractor specifications. Retain copies of contractor specifications in project files. Perform site inspections to verify contractor compliance. Retain inspection records in the project file. 	Implementing Agencies; Construction Contractor	During Construction
<p>NOISE-6: Approval of construction permits shall ensure that where a GBMP project would be constructed adjacent to an existing or potential historic building, the implementing agency shall require by contract specifications that a certified structural engineer be retained to submit evidence that the operation of vibration-generating equipment associated with the construction activities would not result in any structural damage to the adjacent historic building. Contract specifications shall be included in the construction documents for the applicable GBMP project development.</p>	<ul style="list-style-type: none"> Include mitigation measure in construction contractor specifications. Retain a certified structural engineer to submit evidence that the operation of construction activities would not result in any structural damage to historic building. Structural engineer shall verify that operation of construction equipment would not result in damage. Retain engineer report and any necessary information in project file. Retain copies of construction equipment information in the project file. 	Implementing Agencies; Construction Contractor	Before Construction
Traffic and Transportation			
<p>TR-1: The implementing agency's construction contractor shall prepare and implement a Traffic Control/Traffic Management Plan subject to approval by appropriate local jurisdictions prior to construction. The plan shall include protocols for traffic control, work hours, notifications, emergency responder communication, local access and other provisions as applicable.</p>	<ul style="list-style-type: none"> Include mitigation measure in construction contractor specifications. Retain copy of Plan in the project file, including correspondence documenting approval of the Plan by the applicable local jurisdiction(s). Perform site inspections to verify compliance with the Plan. Retain copies of monitoring records in the project file. 	Implementing Agencies; Construction Contractor	Before and During Construction
<p>TR-2: The implementing agencies shall identify all roadway locations where special construction techniques (e.g., horizontal boring, directional drilling or night construction) could be used to minimize impacts to traffic flow, and implement such techniques when feasible.</p>	<ul style="list-style-type: none"> Include mitigation measure in project design specifications. Include mitigation measure in construction contractor specifications. Retain copies of all design and construction specifications in the project file. 	Implementing Agencies; Construction Contractor	Before Construction

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p>TR-3: The implementing agencies shall develop circulation and detour plans to minimize impact to local street circulation, including bikeways. This may include the use of signing and flagging to guide vehicles and cyclists through and/or around the construction zone.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copy of plans in the project file. • Perform site inspections to verify compliance with the plans. • Retain copies of monitoring records in the project file. 	Implementing Agencies; Construction Contractor	Before and During Construction
<p>TR-4: The implementing agencies shall encourage construction crews to park at staging areas to limit lane closures in the public right-of-way.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. 	Implementing Agencies; Construction Contractor	During Construction
<p>TR-5: Peak travel periods shall be avoided where possible when implementing partial road closures.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Perform site inspections to verify compliance. • Retain copies of monitoring records in the project file. 	Implementing Agencies; Construction Contractor	During Construction
<p>TR-6: The implementing agencies shall consult with nearby school districts at least one month prior to construction to coordinate bus stop relocations (if necessary), alternative busing routes, alternative Safe Routes to School programs, and other circulation provisions to reduce potential interruption of student transit services.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of correspondence with school districts in the project file. • Perform site inspections to verify compliance with circulation provisions. • Retain copies of monitoring records in the project file. 	Implementing Agencies; Construction Contractor	Before and During Construction
<p>TR-7: Implementing agencies shall require the construction contractor to consult with local jurisdictions if bicycle or pedestrian facilities would be directly affected by construction activities. If required, the construction contractor shall develop circulation and detour plans to minimize impacts to bikeways and pedestrian facilities. This may include the use of signing and flagging to guide vehicles, cyclists, and pedestrians through and/or around the construction zone. After construction is complete, implementing agencies shall ensure that bicycle or pedestrian facilities are restored to pre-construction conditions.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of correspondence with local jurisdictions in the project file. • Retain copy of circulation and detour plans in the project file. • Perform site inspections to verify compliance with the plans. • Retain copies of monitoring records in the project file. 	Implementing Agencies; Construction Contractor	Before, During, and After Construction
<p>TR-8: Implementing agencies shall require the construction contractor to consult and coordinate with Metro and/or other local transit agencies at least one month prior to construction of pipelines within roadways that coincide with bus routes, to determine whether construction of the proposed project would affect bus stop locations or</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of correspondence with Metro in the 	Implementing Agencies; Construction Contractor	Before and During Construction

**TABLE 13-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE WRD GBMP PROGRAM EIR**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
otherwise disrupt public transit routes. A plan shall be developed to relocate bus stops or reroute buses to avoid disruption of transit service.	<ul style="list-style-type: none"> • project file. • Retain copy of bus relocation/rerouting plans in the project file. • Perform site inspections to verify compliance with the plans. • Retain copies of monitoring records in the project file. 		
Utilities and Energy			
UTIL-1: Project facility design and construction methods that produce less waste or that produce waste that could be recycled or reused more readily, shall be encouraged.	<ul style="list-style-type: none"> • Include mitigation measure in project design specifications. • Ensure design specifications are included in construction contractor specifications. • Retain copies of design and contractor specifications in project files. 	Implementing Agencies; Construction Contractor	Before and During Construction
UTIL-2: The contractor shall be required to describe plans for recovering, reusing, and recycling wastes produced through construction, demolition, and excavation activities described in the construction specifications.	<ul style="list-style-type: none"> • Include mitigation measure in project construction specifications. • Retain copies of recycling/reuse plan in the project file. • Verify implementation of plan and maintain reports or correspondence that document plan implementation in the project file. 	Implementing Agencies; Construction Contractor	During Construction
UTIL-3: Implementing agencies shall require the use of energy efficient equipment, including pumps, conveyance features, and lighting in new facilities and treatment plants. The proposed facilities, including pumps, injection and extraction wells, and treatment plants, shall be designed and operated to shift energy demands to off-peak periods wherever possible.	<ul style="list-style-type: none"> • Include mitigation measure in project design specifications. • Ensure design specifications are included in construction contractor specifications. • Retain copies of design and contractor specifications in project files. • Perform site inspections to verify contractor compliance. Retain inspection records in the project file. 	Implementing Agencies; Construction Contractor	Before and During Construction
Cumulative Impacts			
CUM-1: Implementing agencies shall coordinate project construction activities with other municipalities (e.g., City of Los Angeles, County of Los Angeles, and the 17 municipalities through which GBMP projects traverse) and agencies (e.g., Caltrans, Central Basin MWD, West Basin MWD) in the project area in Los Angeles County. Phasing of project construction shall be coordinated to minimize cumulative impacts to noise, traffic, and roadway circulation.	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of correspondence and coordination with other agencies and jurisdictions in the project file. 	Implementing Agencies; Construction Contractor	Before and During Construction