Agencies and Jurisdictions

CITY OF BURBANK

OFFICE OF THE CITY COUNCIL

February 15, 2006

Jawahar P. Shah
City of Los Angeles
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, California 90065

Dear Mr. Shah:

The City of Burbank (Burbank) appreciates the opportunity to comment on the Integrated Resources Plan Draft Environmental Impact Report (Draft EIR) released by the City of Los Angeles. As an amalgamated agency with Los Angeles for wastewater conveyance and treatment and a part of the Los Angeles River Watershed, Burbank's wastewater and storm water operations are inextricably linked with Los Angeles', thus coordination between our cities is essential.

While Burbank understands the need for the City of Los Angeles to improve and expand its wastewater, storm water and recycled water systems, these improvements should not have significant adverse impacts on neighboring cities. Unfortunately, the Glendale-Burbank Interceptor Sewer (GBIS) North Alignment alternative in the Draft EIR would cause unavoidable significant adverse environmental impacts to Burbank residents and businesses. The City of Burbank is adamantly opposed to the northern alignment and, therefore, requests that the Final Environmental Impact Report properly characterize the northern alignment as an environmentally inferior alternative and urges the City of Los Angeles to reject this alternative.

AJ1-1 Fortunately, the Draft EIR presents the GBIS South Alignment alternative which would have significantly fewer impacts on the environment. Even though the GBIS South Alignment tunnels under a small section of Burbank, this southern alignment alternative is far superior to the GBIS North Alignment.

The GBIS North Alignment would create significant construction and operation related impacts on Burbank residents and businesses. The northern alignment includes tunneling under Burbank residential properties and businesses along with several maintenance holes in Burbank streets. Of particular concern are the possible shaft sites within or adjacent to the City of Burbank. Construction at the Valley Heart or Riverside West shaft sites would be extremely disruptive to Burbank residents and should be determined to be environmentally inferior in the Final Environmental Impact Report.

AJ1-2 In addition, the Draft EIR fails to analyze health impacts to residents and workers from exposure to toxic substances known to contaminate both the water and soil that will be pumped and excavated during the three-year construction process. The significance of this omission, and the extent to which it renders the Draft EIR inadequate, are described in detail in the attached

275 E. Olive Avenue · P.O. Box 6459 · Burbank, California 91510-6459 · (818) 238-5751 · FAX (818) 238-5757

printed on recycled paper

Letter AJ1. Signatory – City of Burbank

Response to Comment AJ1-1

The City of Burbank submitted six separate comment letters that focus on the proposed Glendale-Burbank Interceptor Sewer (GBIS) analyzed in the Draft EIR for the City of Los Angeles' Wastewater Integrated Resources Plan (IRP). This is the first of those letters. Copies of the other six letters and the responses to them are in AJ13, AJ22, AJ30, AJ31, AJ32, and AJ36.

The IRP EIR analyzes four Project Alternatives (refer to Section 2.3.3 of the Draft EIR for a description of the alternatives) that encompass actions within the jurisdiction of both the LADPW and the LADWP. A fifth alternative, the No Project Alternative, is also analyzed to allow decisionmakers to compare the impacts of approving a proposed alternative and its components with the impacts of not approving the proposed alternative, in accordance with CEQA, Section 15126.6(e). The four Project Alternatives are systemwide alternatives, each of which incorporates components for wastewater treatment, wastewater conveyance, recycled water, and urban runoff (dry weather and wet weather).

GBIS is included as a feature of all four of the Project Alternatives evaluated in the EIR (refer to Section 2.2.1.10 of the Draft EIR for a description of the GBIS alignment). As noted in that section, the Draft EIR evaluates two GBIS alignments. One is a northern alignment and the other is a southern alignment. Because each of the systemwide alternatives analyzed in the EIR (refer to Section 2.3 of the Draft EIR) comprises various facilities or components, a determination of the Environmentally Superior Alternative is made among the alternatives, not among the subsets or components of the alternatives. As discussed in Executive Summary (Section ES1.9) of the Draft EIR, the Environmentally Superior Alternative is Alternative 1.

The City of Los Angeles has received comments about the GBIS North Alignment from members of the public that live or

work in the vicinity of the Valley Heart Shaft Site. The City has also received comments from members of the public about potential impacts along the western portion of the GBIS South Alignment. During, and subsequent to, the public comment period on the Draft EIR, the City of Los Angeles has been coordinating with the City of Burbank in an attempt to address Burbank's concerns about the GBIS North Alignment and to reduce environmental effects to adjacent residents.

The public comment period for the IRP Draft EIR was 120 days in length. CEQA requires a minimum of 45 days for public comment. The City's original comment period was 90 days to afford adequate time for public review of the Draft EIR. The public comment period was later extended an additional 30 days and public notice was issued to allow additional public comment on the Draft EIR. Section 1.2 of this Final EIR discusses in detail the public notice and meetings associated with the Draft EIR. During the extended public comment period, the City of Los Angeles met with the City of Burbank on various occasions (April 10, 13, 17, and 28, 2006) to discuss the GBIS alignments, in particular the desire to reduce impacts to residential neighborhoods. An equally important objective of the meetings was to understand in greater detail Burbank's specific concerns of the proposed GBIS alignments. This communication is further summarized in Section 1.3 of this Final EIR.

In accordance with the criteria developed during the preparation of the IRP Facilities Plan and the objectives established in the Draft EIR (see Section 1.3 of the Draft EIR), the City of Los Angeles' goal is to keep the sewer alignment within the public right-of-way and avoid or minimize impacts to sensitive areas, most specifically residential neighborhoods, to the maximum extent practicable. The City of Los Angeles issued the Draft Joint Report to City Council Motion 06-0234 (February 2006-see Appendix E of this Final EIR) that contains an initial discussion of using variations that combine portions of the GBIS North and GBIS South Alignments to minimize the impacts of selecting either one or the other of the alignments alone.

In an effort to be responsive to comments made on the Draft EIR, the City of Los Angeles has combined the two GBIS alignments evaluated in the Draft EIR in a way that further reduces potential impacts of implementing either the GBIS North Alignment or the GBIS South Alignment independently. Section 1.5.2.2 of this Final EIR presents the GBIS alignment modifications that meet the EIR project objectives in a way that best balances ensuring system integrity, minimizing impacts to residents and neighborhoods from GBIS construction and operation, and minimizing risks to the wastewater conveyance system. The staff recommended GBIS Alignment (described in Section 1.5.2.2) would connect the eastern half of the GBIS South Alignment with the western half of the GBIS North Alignment, and would avoid many of the impacts, including concerns to residential and recreational areas that were expressed during the public review and comment period. In addition to reducing impacts of selecting either the GBIS North Alignment or the GBIS South Alignment, connecting the two as described in Section 1.5.2.2 of this Final EIR, the City of Los Angeles is also incorporating additional voluntary improvement measures that were requested by the City of Burbank in the meetings referenced above. The City of Los Angeles will implement these voluntary measures. These voluntary commitments are discussed in Section 1.5.2.2 of this Final EIR and are also included in the June 13, 2006, correspondence from the City of Los Angeles to the City of Burbank (see Appendix D of this Final EIR) for a copy of the correspondence.

Response to Comment AJ1-2

Section 3.10.3.2 of the Draft EIR discusses the hazardous materials impacts associated with the various components of the IRP. Within the section (see page 3.10-21), the discussion of the impacts for the NEIS II and GBIS discloses that there is the potential to expose the public or environment to hazardous materials related to the handling of contaminated groundwater or by locally affecting the extent or flow of an existing contamination plume. The discussion further states that the hazard would be reduced by avoiding the contaminated plume, by testing and treating water prior to discharge, and by using construction methods that minimize dewatering such as using an earth-pressure tunneling machine. Furthermore, the Draft EIR states that if groundwater contamination is encountered during construction, people could be exposed to health hazards, but that standard protocols for construction in confined spaces and tunneling in potentially gassy conditions would be employed and that worker health and safety would be protected through the preparation of applicable worker health and safety plans (per Cal-OHSA standards). Standard protocols for construction in confined spaces and/or

tunneling under potentially gassy conditions include constituent gas monitoring and the provision of adequate ventilation (by establishing a minimum number of air volume changes per minute) to ensure that gaseous conditions do not occur and that the health and safety of workers is protected.

In addition, the City's Geotechnical staff reviewed the data documenting the extent of contamination available from EPA, compared the plume to the GBIS alignments, and determined that a 3,000-foot to 4,000-foot section of the GBIS North Alignment would extend through the outer edge or margin of the existing groundwater contamination plume, and that volatile organic compounds of concern (PCE and TCE) are present in this area at concentrations up to 5 parts per billion. The maximum contaminant level for these compounds allowed in drinking water is 5 parts per billion, which means that although there are TCE and PCE present in the portion of the groundwater plume into which the GBIS North Alignment would extend, the groundwater does not exceed drinking water standards for TCE and PCE. Because the concentrations of TCE and PCE in the area of the plume that the GBIS North Alignment would extend into are very low, there is a minimal potential for volatilization of these compounds to occur in significant quantities. Rather, any volatilization of these compounds from groundwater that seeps into the tunnel or from excavated soils would be incidental. Standard ventilation requirements for working in confined spaces such as tunnels would ensure that any marginal or incidental volatilization TCE or PCE would not pose a significant health risk to workers. Furthermore, because the concentrations of TCE and PCE in the groundwater are at or below the applicable maximum contaminant levels and would meet drinking water standards, and because contaminated groundwater and soil would be properly managed, transported, and disposed of, there is a minimal potential for the public to be exposed to significant health risks from volatilization of these constituents from either the soil or groundwater.

In addition, the City has combined the two GBIS alignments to reduce concerns about potential impacts associated with either GBIS alignment (as expressed in comments submitted on the Draft EIR), has selected this alignment as preferred, and is recommending it for approval (see Section 1.5.2.2 and response to comment AJ1-1). The staff recommended GBIS Alignment would not require tunneling through the referenced contamination.

AJ1-2 letter from toxicologist Susan L. Mearns, Ph.D., which is incorporated into the City's comments on the Draft EIR.

Burbank's specific concerns about the GBIS North Alignment are discussed in detail in below.

Executive Summary

Section 1.6 of the Executive Summary lists three areas of controversy that were raised by the public as part of the scoping process. Absent from this section is a discussion of the controversy surrounding the GBIS alignment alternatives. The only reason that this area of controversy was not discussed in the scoping process was the lack of information presented by Los Angeles regarding the alignments being considered for this project. Had these alignments been discussed, it is almost certain that there would have been public outcry.

AJ1-3

The release of the GBIS alignment alternatives has generated outrage by residents that would be negatively impacted by the North Alignment. In fact, the vast majority of the comments made at the two public hearings in closest proximity to this proposed project (at the Van Nuys City Hall and Los Angeles Zoo) were about the GBIS alignment alternatives. Therefore, the Executive Summary is deficient in not both listing and describing the controversy surrounding the GBIS alignment alternatives.

Section 3.2 – Aesthetics

AJ1-4 In the North Alignment Alternative, single-family residential areas are adjacent to Riverside East Site, the Valley Heart Site and the Riverside West Site where major structures (shafts, diversion/drops and ATFs) are to be constructed. In contrast, the South Alignment locates major structures away from single family dwellings. The aesthetic impacts on the residential areas impacted by the north alignment from the construction and operation of the major structures must be completely analyzed in the Draft EIR.

The project description (Section 2.1.1.10) does not provide any description of the final structures regarding their height, mass, lighting, etc. The description of the construction activities indicates that very high cranes, large loaders and dump trucks will be used. Yet, the analysis presented only provides general description of a 20 foot construction fence and the potential for exterior lighting. To adequately assess the aesthetic impacts on the residential areas near the major facilities proposed in the North Alignment, an adequate description of the structures and their construction must be provided. For example, the analysis briefly mentions light impacts, but does not describe the source or intensity of such light. Complete information will further reveal the unavoidable impacts on adjacent residential areas associated with the North Alignment.

Section 3.2.4.1 discusses the construction and operation of air treatment facilities (ATF) on the proposed GBIS alignments. Although Section 2 of the Draft EIR indicates that the Valley Heart site is a possible location for an ATF, the aesthetic impacts from the proposed ATF are never disclosed in the project level impact analysis of Section 3.2. An ATF at this site will significantly impact the aesthetics of the recreational area and surrounding homes. This is in contrast to the GBIS South Alignment where the proposed ATFs, if any, would not be visible to homes.

In addition, an ATF at the Valley Heart site will introduce nighttime lighting in an area immediately adjacent to light-sensitive single family homes where there is little or no existing lighting. The light and glare impacts to such sensitive receptors cannot be fully mitigated by directing or shielding the lights and will result in significant unavoidable impacts. The Final EIR

Response to Comment AJ1-3

The Draft EIR Executive Summary lists the known areas of controversy at the time of the issuance of the Draft EIR. Both the GBIS North Alignment and the GBIS South Alignment were evaluated in detail in Section 3 of the Draft EIR, and the controversy regarding the GBIS alignments was not known prior to issuance of the Draft EIR. During the public comment period, comments (both written and oral at the public hearings held after the release of the Draft EIR) were raised about the proposed GBIS alignments and this Final EIR addresses those comments. Also, as discussed in response to comment AJ1-1, the City of Los Angeles has met with the City of Burbank to address many of Burbank's concerns. As also noted in response to comment AJ1-1, the comment period was extended 30 days to allow for additional public comments on the Draft EIR, resulting in a comment period of 120 days. The Areas of Controversy section of the Executive Summary in this Final EIR has been modified to include a discussion of the GBIS alignments and the revised Executive Summary is included in the beginning of this Final EIR. In addition, in consideration of the controversy expressed in numerous comments about both the GBIS North Alignment and the GBIS South Alignment, the City of Los Angeles has combined the two alignments to reduce impacts and address many of the concerns associated with implementing either of the GBIS alignments independently. See Section 1.3 of this Final EIR for an update on the communications that occurred between the City of Los Angeles and the City of Burbank during the public comment period. Also see Appendix D of this Final EIR for City of Los Angeles correspondence to Burbank during this period. A detailed description of the staff recommended GBIS Alignment is contained in Section 1.5.2.2 of this Final EIR.

Response to Comment AJ1-4

Although the GBIS North Alignment would involve more shaft sites near single-family residential areas, the GBIS South Alignment would also include major construction (i.e., drop structures and diversion structures) adjacent to residential land uses. Sections 2.2.1.9 and 2.2.1.10 of the Draft EIR (beginning on page 2-29) provides a detailed

description of the proposed interceptor sewers (NEIS II and GBIS) and includes detailed information on the sewer pipeline and its construction. As detailed in the sections noted above, most of the construction and operation of the proposed sewer infrastructure (both of the GBIS alignments) would occur belowground to minimize adverse impacts to local residents and businesses. Section 3.2.4.1 of the Draft EIR analyzed the potential for aesthetic impacts from the construction and operation of the proposed GBIS alignments (starting with the NEIS II discussion on page 3.2-121) on adjacent land uses. The aesthetics impact analysis (Section 3.2.4.4) determined that, with implementation of mitigation, the potential for the construction and operation of the Project Alternatives to introduce elements that substantially contrast with existing features that represent valued aesthetic images would be less than significant; the potential for impacts resulting from a permanent obstruction of a recognized or valued view, including scenic highways or corridors, would be less than significant; and, impacts to adjacent light-sensitive areas scenic highways or corridor would also be less than significant. The potential impacts of the proposed GBIS North Alignment, in relation to those of the GBIS South Alignment, were taken into consideration when determining the staff recommended GBIS Alignment discussed in Section 1.5.2.2 of this Final EIR.

Various issue and resource areas of Section 3 of the Draft EIR address in detail the potential impacts of the construction and operation of the proposed GBIS alignments (including aboveground structures such as shaft sites and ATFs) as they pertain to potential resource impacts, such as aesthetic, land use and recreational impacts, on adjacent land uses. For instance, in Section 3.2, page 3.2-125, the Draft EIR describes the assumptions used to analyze the impact of the ATFs on aesthetic resources, including specific assumptions associated with a typical ATF that would have an effect on the visual quality of the surrounding area. The ATF assumptions are that each ATF structure would likely include biotrickling filter vessels with recirculation and nutrient tanks that would be constructed at grade and approximately 29 feet tall; the facilities would include carbon absorption units (each of which would be 12 feet tall), odor control fans, foul air piping and dampers leading to stacks that would be approximately 25 feet tall, and a security wall around the facility approximately 10 to 15 feet high. These assumptions have been added to the Project Description (refer to Section 2 of this Final EIR for the proposed modification). Lighting at permanent facilities (i.e., ATFs) would be in a manner that adequately addresses security while minimizing impacts to adjacent land uses. In addition, as detailed in Section 3.2.4.4 of the Draft EIR, mitigation measures AES-MM-7 (measures to minimize construction lighting) and AES-MM-8 (measures to minimize operational lighting) will be implemented to reduce the impact of the new lighting sources to adjacent light-sensitive uses to a less than significant level. Specifically, mitigation measure AES-MM-8 includes directing lighting downward onto the structure, avoidance of outwardly directed spotlights, and use of shielding on lights to isolate the illuminated area.

The project-level impacts of the proposed ATF at Valley Heart (in association with the GBIS North Alignment) are detailed throughout Section 3 of the Draft EIR. However, as the commenter correctly points out, Section 3.2 of the Draft EIR (Aesthetics) inadvertently omitted the details of an ATF at the Valley Heart Shaft Site, but instead described a shaft site that would operate as a drop/diversion structure. This inadvertent omission has been corrected and the change has been made in Section 2 of this Final EIR, along with additional mitigation measures (AES-MM-9 and AES-MM-10) to ensure that the potential aesthetic (and recreational) impacts remain less than significant. These mitigation measures include construction and operational measures that would relocate the proposed Valley Heart Shaft Site and ATF to the west end of the Pollywog site. Section 2 of this Final EIR also includes additional mitigation measures (REC-MM-6 through REC-MM-8) specific to the Valley Heart Shaft Site and ATF that would offset the loss of recreational use at the western portion of Pollywog. As with the proposed GBIS North Alignment, ATFs have been proposed and analyzed adjacent to residential uses associated with the GBIS South Alignment (i.e., ATF at Woodbridge Park). Project features and mitigation measures (such as AES-MM-3, AES-MM-4, REC-MM-3 and REC-MM-5) have been included to reduce the impacts of the project by locating the construction and operation so it least affects the residential land uses and recreational resources (including the equestrian trail). Regarding operational lighting of the ATF at the Valley Heart site, mitigation measure AES-MM-8 has been revised to include specifically the implementation of lighting measures to reduce potential lighting impacts on adjacent light-sensitive uses to a level that is less than significant. As stated above, the potential impacts associated with the proposed GBIS North Alignment, in relation to those of the GBIS South Alignment, were taken into consideration when determining the staff recommended GBIS Alignment (see Section 1.5.2.2 of this Final EIR).

As adequately addressed in Section 3.5 (page 3.5-34) of the Draft EIR, if construction impacts to the native trees at the Riverside East Shaft Site cannot be avoided, preservation would be attempted. If preservation is not appropriate, impact to the trees would be mitigated with implementation of mitigation measure BIO-MM-5, and no significant impact would occur to the character of the Bette Davis Park. In addition, no aboveground operational structures were associated with the Riverside East Shaft Site; hence, no aesthetic impacts would occur. As detailed in Section 1.5.2.2 of this Final EIR, no shaft site is recommended at Riverside East.

must include a more complete analysis of these impacts and compare them to the southern alignment, which does not include an ATF immediately adjacent to any residential neighborhoods.

Further, the Aesthetics Section must include an analysis of potential significant adverse aesthetic impacts resulting from destruction of dense native coast live oak, California black walnut and California sycamore trees at Bette Davis Park if the GBIS northern alignment is constructed. This adverse impact will significantly alter the character of an established and highly used recreation resource, and the failure to discuss this adverse aesthetic impact renders the impact analysis inadequate. AJ1-4

Section 3.4 – Air Quality

Section 3.4 of the Draft EIR addresses Air Quality impacts of the proposed projects, but does not include analysis of the construction impacts in terms of the Localized Significance Thresholds (LST) now required by the SCAQMD (SCAQMD, Localized Significance Methodology, June 2003). While the analysis on pages 3.4-111 and 3.4-112 shows the daily and annual emissions resulting from construction, the analysis does not compare these emissions to established thresholds and does not indicate their effects on nearby sensitive receptors as required by SCAQMD. Such an analysis would likely reveal that construction air quality emissions from the North Alignment would be significantly greater than that associated with the south alignment because so many more sensitive receptors are located near north alignment structures. (The noise section demonstrates that over one hundred homes are adjacent to the major structures in the North Alignment, while no homes are near the major structures of the South Alignment.) The Final EIR must include an analysis consistent with the LST methodology and must compare the impacts for the two alignment alternatives. AJ1-5

The Draft EIR also describes potential significant adverse impacts to air quality resulting from the formation of odors by the GBIS. Section 3.4.2.5 states that "the proposed ATFs associated with each of the GBIS alignments would be constructed at sites that currently have no sewer gas emissions. As a result, no existing wastewater-related odor sources are associated with sites where ATFs are proposed." Unfortunately, this is not correct.

Section 2 of the Draft EIR lists the Valley Heart site as a possible location for an ATF if the GBIS North Alignment is chosen. The GBIS North Alignment, as shown on figure 2-10 is almost identical to the existing Los Angeles North Outfall Sewer (NOS) alignment as it passes through residential areas in the City of Burbank, including the Valley Heart site. As stated in the Draft EIR, "odors are occasionally observed near maintenance holes associated with . . . the NOS."[1] Therefore, there are existing wastewater related odor sources where an ATF is proposed. AJ1-6

Furthermore, Figure 3.4-9, which attempts to indicate locations of odor complaints near the Northeast Interceptor Sewer – Phase II (NEIS II) and GBIS from March 2003 to January 8, 2005, is incomplete. This map may show all of the odor complaints received by the City of Los Angeles during this time, but it does not include odor complaints received by the City of Burbank. Figure 3.4-9 leads the reader to an incorrect conclusion that existing odors are not an issue in the area. In 2003 and 2004, the City of Burbank received 67 odor complaints in the vicinity of the Valley Heart site (see attached map). The North Alignment of GBIS, which includes a shaft site and ATF at the Valley Heart site, would add an additional odor source to this area.

[1] Integrated Resources Plan – Draft Environmental Impact Report, page 3.4-45.

Response to Comment AJ1-5

The Draft EIR provides estimates of the total construction emissions of the wastewater components that are included in one or more systemwide alternative. The construction emission estimates include mobile emissions. Each Project Alternative would be comprised of numerous wastewater treatment and conveyance system elements, as well as recycled water and runoff management components. The Draft EIR does not provide an LST analysis of the subparts of each component that comprise the Project Alternatives, because the LST analysis is not applicable to regional projects (per SCAG, the IRP is considered a regional project of regional importance). However, the Draft EIR does acknowledge that there is a potential for localized air quality impacts to sensitive receptors from potential exceedances of the CAAQS and/or the NAAQS (see the discussions under Impact AQ-1 for each build alternatives in Section 3.4.3.3 of the Draft EIR).

Response to Comment AJ1-6

A section of the NOS is located near the Valley Heart Shaft Site. The NOS is one of the City's oldest sewers and was constructed in the 1930s through 1950s. Odor releases from sewers can generally occur under high flow conditions, and past odors attributed to the NOS may have occurred under such conditions. Either of the GBIS alignments evaluated in the Draft EIR would divert wastewater from sewers that flow into the NOS upstream of the City of Burbank near the west terminus of GBIS, which would reduce both the amount of flow within the NOS and the likelihood of odors being released from the NOS in the future. In addition, the GBIS North Alignment would divert flow from the NOS at the Valley Heart Shaft Site, and treat sewer air with a two-staged filtration process at the ATF proposed for that site. The GBIS alignments are expected to result in a reduction in the future of the number of untreated odor releases from the existing NOS as a result of the flow diversions, and the GBIS North Alignment in particular would use the ATF at the Valley Heart Shaft Site to treat sewer gases prior to release. As discussed in Section 3.4 of the Draft EIR, the GBIS North Alignment would place an ATF at the Valley Heart Shaft Site, and potentially significant odor impacts were

identified (see pages 3.4-115 and 3.4-159 of the Draft EIR). In addition, mitigation measures AQ-MM-7 and AQ-MM-8 would respectively mitigate odor impacts by relocating the ATF stack to a location at least 100 feet from sensitive receptors and establish a more stringent hydrogen sulfide emission concentration at the stack. In addition, a new mitigation measure has been added, mitigation measure AES-MM-10, to provide further aesthetic mitigation. This measure would also further mitigate potential odor impacts by siting the ATF at the Valley Heart Shaft Site to the west end of the Pollywog site, which is located more than 100 feet away from residences. Under this new mitigation measure, access to the ATF would occur from Keystone Street. Section 1.5.2.2 of this Final EIR discusses the GBIS alignment that the City of Los Angeles is recommending for approval. Response to comment AJ1-1 also discusses the process and rationale for the staff recommended GBIS Alignment discussed in this Final EIR. The staff recommended GBIS Alignment would not place an ATF at the Valley Heart Shaft Site. Lastly, the odor setting in the EIR and Figure 3.4-9 have been modified to include the odor complaints reported to the City of Burbank in 2003 and 2004, as indicated in the comment letter.

On page 3.4-46, air toxics related to the GBIS alignments are addressed. The second paragraph of this section states:

> *In addition, existing sewer systems in the general GBIS vicinity, such as the NOS or VORS, could generate emissions of sewer gas through unsealed maintenance holes. Sewer gas can contain H_2S and small quantities of VOCs (Tran, 2005). The proposed ATFs associated with each of the GBIS alignments would be constructed at sites that currently have no sewer gas emissions.*

AJ1-7

As discussed above, areas near the Valley Heart site currently do experience sewer gas emissions. The placement of an ATF at this site would exacerbate an existing condition, and thereby, impose a significant adverse impact on residents in this area.

Section 3.4.3.2 attempts to summarize the air quality impacts to the project level components. Included in the analysis of the GBIS South Alignment is Table 3.4-54 (page 3.4-114), Maximum H_2S Concentrations Associated with ATFs for the GBIS South Alignment. This table illustrates that four of the five ATF sites exceed the odor threshold. The four that exceed this threshold are 17 to 20 meters from the receptor. It is this proximity that causes the maximum H_2S concentration to exceed the threshold of 11.26 $\mu g/m^3$.

Rather than create a table for the North Alignment similar to Table 3.4-54, page 3.4-115 refers back to the Table 3.4-54 used for the South Alignment. Referencing a previous table instead of creating a new one is only acceptable where the intent is to prevent needless repetition. In this case, information and analysis of the Valley Heart shaft site has not been shown and should be included in a table for the GBIS North Alignment.

In place of providing a table that includes the Valley Heart shaft site, the Draft EIR merely indicates that the Valley Heart shaft site exists, the nearest sensitive receptor is less than 33 feet away, and that it would likely experience objectionable odors. There are a couple of disturbing aspects about addressing air quality impacts at the Valley Heart shaft site in this manner.

AJ1-8

First, when analyzing the other possible ATF sites the distance to the receptor is listed in meters. The given distance to a receptor for the Valley Heart site is in feet. If converted to meters so that a direct comparison can be made, the receptor distance for the Valley Heart site is 10 meters. This would be easily the closest receptor distance of any possible ATF site. By listing the distance in feet rather than meters, an unfair comparison of odor impacts is made. Including a table using the same units for all possible ATFs must be done to make an accurate comparison.

Second, it appears no analysis was done for the Valley Heart site to see if the maximum H_2S concentration will exceed the threshold of 11.26 $\mu g/m^3$. The Draft EIR makes the assumption that the threshold will be exceeded, but does not include the result of the analysis. Due to the proximity of the receptor, it is likely that the maximum 1-hour H_2S concentration will be much higher than those possible ATF sites where the nearest receptor is at least 17 meters away. The missing analysis and lack of resulting data to compare ATF sites masks the true odor impacts of the possible use of the Valley Heart site for an ATF. The Draft EIR analysis of potentially significant air quality impacts is, therefore, inadequate and must be revised to present a comparative analysis of the impacts of both the northern and southern GBIS alignments.

Response to Comment AJ1-7

As described in the response to comment AJ1-6, the odor setting related to GBIS has been revised to reflect an existing odor condition in the vicinity of the Valley Heart Shaft Site and to reflect the odor complaint information provided by the commenter. As described in the response to AJ1-6, a section of the existing NOS is located near the Valley Heart Shaft Site. Because the NOS is one of he City's oldest sewers and is subject to high flow conditions, the NOS could have contributed to some of the sewer gas odors referenced by the commenter. The installation of either of the GBIS alignments would be expected to reduce the potential for sewer gas releases from the NOS because it would relieve sewers that flow into the NOS, which would result in a reduction in flows in the NOS. High flows in sewers tend to force sewer gases out of the sewers because less air space is available above the flowing wastewater to convey the air downstream. A reduction in wastewater flows in the NOS is expected to decrease the potential for sewer gas releases from the NOS by reducing the flow in the NOS and increasing the available air space to convey the sewer gases downstream. Regarding the placement of an ATF at the Valley Heart Shaft Site under the GBIS North Alignment, the two-staged air filtration process at the ATF, described in Section 2 of the Draft EIR, would remove both hydrogen sulfide and VOCs from the sewer gases. In addition, the ATF could not operate unless it is permitted by the SCAQMD. As part of the permit conditions, the ATFs would have to demonstrate compliance with SCAQMD Rules 402 (Nuisance) and 1401 (Toxic Air Contaminants). Rule 1401 would require an estimation of human health risk impacts and a demonstration that risks would not exceed SCAQMD-mandated limits. The reduction in untreated sewer gas releases in conjunction with compliance with permit requirements from the SCAQMD is expected to keep potential impacts associated with the ATF to a minimum. In addition, a new mitigation measure has been added, mitigation measure AES-MM-10, to provide further aesthetic mitigation. This measure would also further mitigate potential odor impacts by siting the ATF at the Valley Heart Shaft Site to the west

end of the Pollywog site, which is located more than 100 feet from residences. Section 1.5.2.2 of this Final EIR discusses the GBIS alignment that the City of Los Angeles is recommending for approval. Response to comment AJ1-1 also discusses the process and rationale for the staff recommended GBIS Alignment discussed in this Final EIR. The staff recommended GBIS Alignment would not place an ATF at the Valley Heart Shaft Site.

Response to Comment AJ1-8

The commenter correctly points out that the odor evaluation for ATF proposed for the Valley Heart site refers to the ATF impact evaluation for the GBIS South Alignment. This is because the odor dispersion modeling determined that at the odor threshold of 11.26 $\mu g/m^3$ would likely be exceeded at receptor distances less than 30 meters, and the ATF proposed for the Valley Heart Shaft Site under the GBIS North Alignment would be less than this 30-meter distance. Consequently, the Draft EIR accurately concludes that a significant odor impact would likely result from the ATF at the Valley Heart Shaft Site because the distance of the nearest receptor to the ATF would be 33 feet, which is less than the 30 meters.

Regarding the use of distance units, the Draft EIR uses both metric and English units. Table 3.4-54 provides distances from receptors to the ATFs in meters, and the associated discussion provides those distances in feet. Although the description of receptor distances to ATFs in the Draft EIR uses both metric and English units, the determination of potential significance is based solely on the likelihood that a receptor is within the distance at which odor threshold exceedances are likely (approximately 30 meters or 99 feet), regardless of which measurement unit is being used. However, to avoid confusion, the measurement of 33 feet referenced on page 3.4-115 of the Draft EIR has been revised in Section 2 of this Final EIR to reflect a metric measurement of 10 meters.

Regarding the comment that no analysis was performed for the Valley Heart Shaft Site to see if maximum hydrogen sulfide concentrations will exceed the odor threshold of 11.26 $\mu g/m^3$, the dispersion analysis performed for the ATFs (presented in Section 3.4 of the Draft EIR) and the receptor distance at which the odor threshold is no longer exceeded is applicable for all ATFs, including the ATF proposed for the Valley Heart Shaft Site. Consequently, the determination of significance prior to mitigation is based solely on the likelihood that the odor threshold would be exceeded. As correctly noted in the comment letter, receptors that are closer to an ATF would experience higher levels of odors than receptors that are located farther away from the ATFs. However, the determination of significance is based on the dispersion evaluation that showed that at receptor distances less than 99 feet, or 30 meters, odor significance threshold exceedances are anticipated.

Regarding the relative level of impacts of the two GBIS alignments evaluated in the Draft EIR, as indicated in the comment letter and various other comment letters, the GBIS North Alignment has potential odor impacts (from the NOS diversion and ATF at the Valley Heart Shaft Site) that are not associated with the GBIS South Alignment.

The Valley Heart Shaft Site is a large parcel with ample room to locate the proposed ATF far enough away from residential receptors such that the odor significance threshold would not be exceeded, after implementation of AQ-MM-7 and AQ-MM-8. In addition, a new mitigation measure has been added, mitigation measure AES-MM-10, to provide further aesthetic mitigation of the ATF at the Valley Heart Shaft Site. This measure would also further mitigate potential odor impacts by siting the ATF at the Valley Heart Shaft Site to the west end of the Pollywog site, which is located more than 100 feet from residences. As a note, the City has identified the staff recommended GBIS Alignment described in Section 1.5.2.2 of this Final EIR as the preferred GBIS alignment and is recommending this alignment for approval. The staff recommended GBIS Alignment would not place an ATF at the Valley Heart Shaft Site.

Section 3.5 – Biological Resources

In Section 3.4, both GBIS alignments are analyzed in regards to the disruption of biological resources during both construction and operation. The Draft EIR explains that the Riverside East shaft site (Bette Davis Park) in the GBIS North Alignment may require the removal of trees protected by local ordinances. The section states:

> *The non-native landscaped vegetation on the shaft sites, except for one, consists of ornamental species, and none of the trees have removal restrictions under local tree ordinances or policies. The exception is the Riverside East shaft site area, which supports a dense grove of trees that includes native coast live oaks, California black walnuts, and California sycamores. In the event native trees onsite cannot be preserved or avoided, impacts to trees would occur in conflict with local ordinance and policy.*

AJ1-9

It is unlikely that the removal of many of these protected trees could be avoided due to the density of the trees at this location. Not only do these trees have a protected status, but they are situated directly across the street from single family dwellings. These trees are situated directly across from single family residences where they are enjoyed by the public. The loss of these protected trees is completely unnecessary since the GBIS South Alignment would not cause their removal. Furthermore, the Draft EIR on page 3.5-19 clearly demonstrates that the sites designated for major structures in the North Alignment contain more sensitive biological resources than the sites in the South Alignment. Therefore, the GBIS North Alignment creates an unnecessary environmental impact and should be rejected.

Section 3.9 – Geology and Soils

Tunneling for either the northern or southern alignment of the GBIS is expected to cause ground settlement that cannot be fully mitigated. The Draft EIR states that the settlement will be controlled by requiring the contractor to comply with a performance standard that limits settlement to less than 0.75 inch. The impacts to residential and commercial properties from three-quarter-inch settlement would be much more significant than to open space or areas within the public right-of-way. The northern alignment appears to be under more residential properties than the southern alignment; thus, significant adverse settlement impacts will be greater if the GBIS were built along the northern alignment. In order to provide full and adequate disclosure of the impacts from the GBIS northern and southern alignment options, the Geology and Soils Section must be revised to provide a comparative analysis of adverse settlement impacts that may result from implementation of both alignments.

AJ1-10

Section 3.12 – Land Use and Planning

The adopted Los Angeles River Master Plan (page 251 figure 58) shows an equestrian bridge from the Pollywog area across the LA River to facilitate equestrian activities in the Pollywog area. The proposed construction activities and Air Treatment Facility associated with the "Northerly Alignment" will conflict with equestrian use of the Pollywog area and are in conflict with equestrian provisions in the Los Angeles River Master Plan. This plan inconsistency needs to be disclosed and analyzed in the Draft EIR.

AJ1-11

AJ1-12 As well, according to Section 3.12.3.2, the GBIS North Alignment could require permanent underground easements from private properties. Underground private property easements

Response to Comment AJ1-9

BIO-MM-5 mitigates potential impacts to protected oak trees and states that the City will comply with any replacement requirements listed in the City of Los Angeles tree ordinances with regard to protected oak tress. The Oak Tree Ordinance – Los Angeles Municipal Code Section 46.00, Oak Tree Regulations, enforced by the Bureau of Street Services, Street Tree Division, states that the Board of Public Works may grant a permit for the relocation or removal of an oak tree when "it is necessary to remove the oak tree because its continued existence at said location prevents the reasonable development of the subject property" (Section 46.01[b][1]) and "the presence of the oak tree interferes with utility services and roadways within or without the subject property and the only reasonable alternative to the interferences is the removal of the tree" (Section 46.01[b][4]). Additionally, Section 46.01(b) identifies conditions under which a permit may be granted for the relocation or removal of an oak tree, including replacement planting of oak trees with oak or different tree species (the replacement trees are to approximate the value of the tree to be replaced) or relocation of the affected oak trees. As BIO-MM-5 states, a qualified biologist would identify and quantify the trees to be removed at the Riverside East Shaft Site or other program-level component locations, as applicable, and these activities will be conducted prior to construction.

The City of Los Angeles has coordinated with City of Burbank as discussed in Section 1.3 of this Final EIR to discuss concerns raised by the City of Burbank during the public comment period, and, at this time, the staff recommended GBIS Alignment does not include a shaft site at the Riverside East (Bette Davis Park). The staff recommended GBIS Alignment to be included in the Recommended Alternative is described in detail in Section 1.5.2.2 of this Final EIR.

Response to Comment AJ1-10

Section 3.9.3.2 of the Draft EIR identifies the potential for settlement impacts along the GBIS alignments. Numerous factors contribute to whether a tunneling project would result in settlement that could affect surface structures, including subsurface soil conditions, tunnel boring machine type, depth of the tunnel, horizontal alignment within the street, and proximity of surface structures relative to the tunnel alignment. Although one GBIS alignment could have greater or fewer structures along the surface of the alignment, there is no way to predict with complete surety which alignment would pose a greater potential for settlement impacts to surface structures because many unknown variables contribute to the potential for settlement impacts. The Draft EIR concludes that there is a potential for significant settlement impacts associated with either of the GBIS alignments after implementation of mitigation measure GEO-MM-2, which sets a performance standard to limit settlement at 0.75-inch during tunneling, precisely because of the unknown nature of subsurface soil conditions.

Section 1.5.2.2 of this Final EIR discusses the GBIS alignment that the City of Los Angeles is recommending for approval. Response to comment AJ1-1 also discusses the process and rationale for selecting the staff recommended GBIS Alignment discussed in this Final EIR. The staff recommended GBIS Alignment discussed in this Final EIR would connect the eastern portion of the GBIS South Alignment and the western portion of the GBIS North Alignment via a section of tunnel beneath Pass Avenue. This connector tunnel beneath Pass Avenue would reduce the amount of sewer tunneled beneath streets in Burbank by approximately 0.75 miles when compared to the GBIS North Alignment. To reiterate, Section 1.5.2.2 of this Final EIR explains the rationale, including the environmental considerations and stakeholder concerns, for selecting the staff recommended GBIS Alignment.

Response to Comment AJ1-11

The LARMP map referenced in the comment letter shows a potential equestrian bridge location that crosses the Los Angeles River and connects one bank to the other. The map indicates that the bridge would be located south of the SR-134 and does not show a connection with Pollywog Park, as indicated in the comment letter. Section 3.16.3.2 of the Draft EIR identifies mitigation measure REC-MM-2, which requires the City's Bureau of Engineering to coordinate with the City's Department of Recreation and Parks and the City of Burbank to obtain comments from these parties during the design process for GBIS to minimize impacts to recreational facilities. Compliance with this mitigation measure would minimize potential conflicts with the potential equestrian bridge indicated on the LARMP map (Figure 58) if indeed the bridge is planned to extend from Pollywog across SR-134 and the Los Angeles River. Section 1.5.2.2 of this Final EIR discusses the GBIS alignment that the City of Los Angeles is recommending for approval. Response to comment AJ1-1 also discusses the process and rationale for the staff recommended GBIS Alignment discussed in this Final EIR. The staff recommended GBIS Alignment would not place a shaft site or ATF at the Valley Heart Shaft Site and would, therefore, not result in potential conflicts with the LARMP.

Response to Comment AJ1-12

As described in Section 3.12.3.2 of the Draft EIR, either of the GBIS alignments (North or South) could require the acquisition of permanent underground easements from private parties where the tunnel curves beneath private property. The Draft EIR also acknowledges that regardless of the alignment selected, the related locations/sites requiring access to permanent structures, such as drop structures, would limit the extent of the development/use of that site in the future. Because the surface access to a drop structure consists of a maintenance hole, the area that would be limited to future development would be minor. As described in Section 3.12.3.2 of the Draft EIR, precluding future development of portions of the sites with a drop structure would not result in substantial changes in the immediate community and, therefore, would not be considered a significant disruption to land use. Section 1.5.2.2 of this Final EIR discusses the GBIS alignment that the City of Los Angeles is recommending for approval. Response to comment AJ1-1 also discusses the process and rationale for the staff recommended GBIS Alignment discussed in this Final EIR.

The staff recommended GBIS Alignment discussed in this Final EIR would include a short section of tunnel beneath Pass Avenue, and some subsurface easements could be required where the alignment must travel beneath private property. The acquisition of such easements would be consistent with those described in Section 3.12.3.2 of the Draft EIR, which discloses that the acquisition of permanent underground easements from private parties could be required where the tunnel curves beneath private properties property. In addition, the staff recommended GBIS Alignment would require the acquisition of the auto repair facility located at 11003 W. Moorpark Street or the surface parking lot located at 10928 W. Riverside Drive for appurtenant structures, as discussed in Section 3.12.3.2 of the Draft EIR. Impacts related to the acquisition would not be significant because the acquisitions would occur at market rate or with relocation assistance (see Section 3.14.3.2 of the Draft EIR).

would not be required if the GBIS South Alignment is selected. In addition, the GBIS North Alignment may require the acquisition of private property at 11003 W. Moorpark Street or 10928 W. Riverside Drive. A drop structure is proposed either on Caltrans property or one of these sites. This structure would limit the ability for these sites to be fully utilized in the future. This impact to land use would not occur with the use of the GBIS South Alignment.

AJ1-12

Section 3.13 – Noise and Vibration

AJ1-13

No other impact so clearly delineates the disproportionate impacts associated with the North Alignment than noise. There are three construction sites in the North Alignment and two construction sites in the South Alignment that are exclusive to each. These are the Riverside East, Valley Heart and Riverside West sites in the North Alignment, and the Barham and Travel Town sites in the South Alignment. The noise impacts on the three North Alignment sites are extraordinarily significant.

The noise and vibration impacts of GBIS construction are proposed to occur for three years and to increase noise levels dramatically. Noise levels are expected to achieve a community noise equivalent level (CNEL) of 88 dB or more at the construction site. (While many of the tables in this section of the Draft EIR do not clearly point out that the noise levels are measured in CNEL, it is clear from Table 3.13-28 regarding the NEIS, that the dB levels are expressed in CNEL.) CNEL is not a peak noise, or a periodic noise, but the average noise over a 24 hour period. Peak noise levels are well in excess of 95 dBA. Even considering the attenuation of noise over distance, the CNEL levels in adjacent residential areas could be well over 80 CNEL. While short term, peak construction noises might be tolerated, noise from a three-year construction project that would raise CNEL levels to this degree would be excessive.

A comparison of the ambient noise level impacts between the GBIS North Alignment and GBIS South Alignment demonstrate how the southern alignment is environmentally superior. Table 3.13-33 and Table 3.13-35 of the Draft EIR list the number of sensitive receptors that will experience significant adverse noise levels during construction on the GBIS South Alignment and GBIS North Alignment, respectively. The data totals from those tables are illustrated in the table below:

Letter AJ1. Signatory – City of Burbank

Page 6

Response to Comment AJ1-13

As stated in Section 3.13.3 of the Draft EIR, construction nighttime Leq was used to quantify noise impacts for the tunneling and tunnel-lining phases of construction because nighttime construction has the potential to be substantially more disruptive than daytime construction based on the increased sensitivity of most people to nighttime noise. Given that ambient noise level at the construction sites are more than 20 decibels less than the construction noise levels; construction noise levels would remain unchanged regardless of whether the noise analysis used CNEL or Leq. Peak noise levels were not evaluated because it would occur infrequently and would not characterize the construction noise levels that would typically be experienced in the area surrounding the construction site. According to the thresholds of significance for noise applied in the Draft EIR, a significant impact would occur if construction noise levels incrementally increase ambient noise levels at sensitive receptors by 5 decibels or more. Tables 3.13-33 and 3.13-35 of the Draft EIR identify the number of sensitive receptors along the GBIS alignments that would experience noise level increases of 5 decibels or more because that decibel level is the threshold of significance.

Data Totals from Tables 3.13-33 and Table 3.13-35

Sensitive Receptors that Would Experience Noise Level of 5 dBA or More During Construction

Alignment	Residences		School/Church	Parks	Other
	SFR	MFR[a]			
South Alignment	88	19	3/1[b]	4	1
North Alignment	175	47	2/1	5	0

MFR: single-family residence
SFR: multi-family residence
[a] Where the type of residential land use could not be identified, structure was classified as a multi-family building
[b] Total shown on Table 3.13-33 incorrectly presents the sum of 2/2. The corrected summation is shown here.

It is clear from this table that the GBIS North Alignment causes significant adverse noise impacts to over twice as many residential properties as the GBIS South Alignment. Of these 222 residential properties impacted by construction noise from the North Alignment, 82 are Burbank residences and 34 are Glendale residences. This totals 116 non-Los Angeles residences impacted by noise on a Los Angeles project. The noise related impact on Burbank residents is particularly concerning when an alternate alignment is feasible.

This table does not illustrate the extreme magnitude of the impacts because it only indicates that noise increases would exceed 5 dB. As stated in Table 3.13-34, noise levels near the Riverside East, Valley Heart and Riverside West sites would rise from CNEL levels of 56 and 58 dBA to a CNEL of 88 dBA. This is a shocking increase that would make some residential areas almost uninhabitable.

AJ1-13

The Draft EIR attempts to evaluate noise impacts in part by measuring noise at various proposed shaft sites. The noise measurements at the Valley Heart shaft site were taken over a 24 hour period on February 28, 2005.[2] This noise measurement showed that the primary noise at the site was traffic on SR-134. Since the time of this noise measurement, a sound wall along westbound SR-134 has been completed. This has significantly reduced the noise from the highway and has rendered the noise measurements in the Draft EIR invalid.

AJ1-14

Not only did the sound wall reduce highway noise in the location of the Valley Heart shaft site, but, if the GBIS North Alignment is selected, this new sound wall will reflect construction noise back into the community creating a doubling of project-level construction noise. The effect of this "double impact" (lower background noise due to the sound wall and higher GBIS noise bouncing off the sound wall) will create an intolerable ambient noise level to the many residents that are adjacent to this shaft site and significantly degrade recreational activities at the site.

AJ1-15

In addition to ambient noise caused by construction, groundborne noise will be caused by muck trains during the tunneling operation. During a similar sewer project (NORS) previously constructed by the City of Los Angeles, groundborne noise from muck train operations was a

[2] Integrated Resources Plan – Draft Environmental Impact Report, Table 3.13-8, page 3.13-29

Response to Comment AJ1-14

The additional increase in noise level from the sound wall would not be noticeable (i.e., a 3-decibel or more increase is considered noticeable) during construction. Typically, noise levels increase by 3 decibels when the noise source doubles. This increase assumes that noise would occur in the same location. Although construction noise would bounce off the sound wall, the noise path from the reflected noise would be longer than the direct noise path between the construction noise source and the sensitive receptors. The reflected noise path is longer because the construction noise would first travel from the construction site to the sound wall and then from the sound wall to the noise receptor. Because of the longer distance, it is anticipated that the reflected construction would increase the construction noise that was presented in the Draft EIR by less than 3 decibels. Section 3.13.3.3 of the Draft EIR contains mitigation measure NV-MM-2 that requires the placement of noise curtains along the perimeter of the construction sites to break the line of sight between the construction activity and any sensitive receptors. In addition, Section 3.13.3.3 of the Draft EIR also contains mitigation measure NV-MM- 5 that would allow residents and community members to report noise problems during construction, which would require that the noise problems be resolved. Although the area might experience lower ambient noise levels as a result of the presence of the new sound wall, implementation of mitigation measures would ensure that construction noise levels would not exceed the significance threshold of a 5-decibel or more increase over the ambient noise level.

Response to Comment AJ1-15

Potential groundborne noise impacts associated with tunneling of the GBIS alignments is addressed in detail in Section 3.13.3.2 of the Draft EIR. Specifically, pages 3.13-78 and 3.13-83 address groundborne vibration and noise from construction. As indicated in the Draft EIR, groundborne noise from construction would have the potential to affect more residences if the GBIS North Alignment were chosen. Comment noted.

major source of community complaints.[3] Comparison between the two alignments yields the following table:

Data from Page 3.13-79 and 3.13-83

Groundborne Noise Levels Greater than 45 dBA Caused by Tunnel Construction

Alignment	Residences		School/Church	Other
	SFR[a]	MFR		
South Alignment	101	13	1/0	3
North Alignment – Option A	126	246	6/2	-
North Alignment – Option B	102	168	2/2	-

[a] SFR: multi-family residence
MFR: single-family residence

As this table shows, groundborne noise levels under the GBIS North Alignments impact over 150 more multi-family residential buildings than the GBIS South Alignment. Considering that each multi-family residence can house dozens of people, there can potentially be thousands of people disturbed by groundborne noise levels if either of the GBIS North Alignment alternatives is chosen. The groundborne noise impact will be significantly less under the South Alignment and must therefore be the selected alignment.

AJ1-15

Additionally, the Draft EIR should consider the noise standards of the community and residents the GBIS is impacting. The City of Burbank has a Noise Ordinance which prohibits any increase in the ambient noise level established for a residential neighborhood during the evening hours. The proposed Air Treatment Facility would be located adjacent to a single family residential neighborhood, upon which the project will impose significant adverse noise impacts. To be adequate, the Draft EIR needs to incorporate an analysis of noise impacts at the Valley Heart site under Burbank's noise standards.

AJ1-16

The Draft EIR misleads readers on the comparisons shown on Table 3.13-36 by providing only generalized statements. A reader of this Table would believe that the noise impacts between the two alignments were essentially equivalent when in fact the impacts from the North Alignment are much greater. At a minimum, the Final EIR should include the number of sensitive receptors in each cell of the Table where impacts are shown.

AJ1-17

Section 3.14 – Population, Housing and Employment

As stated in Section 3.14.3.2, the GBIS South Alignment would require the partial acquisition of a private property. This parcel is currently vacant, and no displacements of residents, businesses or employees would occur. On the other hand, the Optional Alignment A of the GBIS North Alignment would require the acquisition of a parcel that is developed by an automobile repair facility. Relocation of this business would need to be provided if this alignment was selected. Optional Alignment B of the GBIS North Alignment could require the acquisition of a surface parking lot that contains four parcels. If this site is used, additional parking would need to be acquired for the businesses that use this lot. Therefore, there is

AJ1-18

[3] Integrated Resources Plan – Draft Environmental Impact Report, page 3.13-69.

Letter AJ1. Signatory – City of Burbank

Page 8

Response to Comment AJ1-16

The City of Burbank Noise Ordinance prohibits nighttime noise level increases for construction activities, leaf blowers, and sound amplifying equipment. The nighttime noise restrictions do not apply to operations of the ATF. Section 21-208 of the City of Burbank Noise Ordinance prohibits the use of any machinery, equipment, pump, fan, air conditioning apparatus, or similar mechanical device that would cause ambient noise levels to exceed 5 decibels. To determine operational noise impacts, the Draft EIR uses a significance threshold of 3-decibel or more increase over the ambient noise level, which is more stringent than the City of Burbank Noise Ordinance. Three decibels is the smallest perceptible change in sound level for a person with normal hearing sensitivity. Additionally, the Draft EIR includes mitigation measures that would require the noisiest equipment of the air treatment facilities to be located as far from the noise-sensitive receptors as feasible. If necessary, noise reduction requirements (i.e., sound walls) will be provided to ensure that ambient noise levels at nearby sensitive receptors will not be perceptible (i.e., an incremental increase of 3 decibels or more).

Response to Comment AJ1-17

Comment noted. Table 3.13-36 has been revised in Section 2 of this Final EIR to identify the number of sensitive receptors potentially affected during construction of each NEIS and GBIS alignments.

Response to Comment AJ1-18

As the commenter correctly states, either of the GBIS alignments would require acquisition of private property, with the majority of the acquisitions necessary for the GBIS North Alignment. As stated in Section 3.14.3.2 of the Draft EIR, relocation assistance would be provided or the parcels would be purchased at market rates, as necessary, if private parcels are required for construction or

clearly a greater impact on employment if either GBIS North Alignments are selected. This adverse effect contributes to the GBIS South Alignment being environmentally superior to the GBIS North Alignment and, therefore, must be included in a comparative analysis of the two options.

AJ1-18

Section 3.16 – Recreation

Table 3.16-5 of the Draft EIR lists the recreational resources within a 2-mile radius of GBIS. Unfortunately, this table does not list Pollywog, the site of the proposed Valley Heart shaft site on GBIS North Alignment, even though the Pollywog area may be part of the Griffith Park Trust lands. Pollywog is used frequently by the equestrian community in this area to exercise their horses and for other recreational purposes. It also provides a critical link to an equestrian trail along the Los Angeles River.

Losing the use of this facility is of great concern to the residents of the City of Burbank. The horses owned by residents need to be properly exercised, and this area is the only suitable place for this purpose. Although the site is large enough to theoretically allow for both the shaft site and equestrian use, the site could not be used during construction because the noise and equipment movement would frighten the animals.

In addition to the construction impacts, an ATF is proposed for this site if the GBIS North Alignment is selected. Locating an ATF on this site would permanently restrict the use of this site for recreational purposes. Section 3.16.2.2 of the Draft EIR fails to recognize the possibility of an ATF at the Valley Heart site and therefore has not assessed the environmental impacts on recreation at this site.

AJ1-19

The following table compares the two shaft sites unique to the GBIS South Alignment and the three shaft sites unique to the GBIS North Alignment in regards to recreation impacts:

	Significant Construction Impact? Duration?	Significant Operational Impact?	Adjacent to Residences?
South Alignment			
Travel Town Shaft Site	No	No	No
Barham Shaft Site	No	No	No
North Alignment			
Riverside East Shaft Site	**Yes – 3 years**	No	**Yes**
Valley Heart Shaft Site	**Yes – 3 years**	**Yes**	**Yes**
Riverside West Shaft Site	**Yes – 3 years**	No	**Yes**

The table above clearly illustrates that the impacts on recreation are significantly greater on the GBIS North Alignment than those on the GBIS South Alignment.

Section 3.17 – Transportation and Traffic

AJ1-20

Section 3.17.3.2 and Tables 3.17-21 and 22 indicate that the peak phase of the construction activity would add 114 one-way truck trips, and 150 construction worker trips per day at each

operation of the GBIS alignments. As addressed in Section 3.17.3.2 of the Draft EIR (page 3.17-70), the parking lot at 1098 West Riverside Drive is offsite (overflow) parking for a nearby automobile dealership. Because the parking lot is part of the staff recommended GBIS Alignment, there would be a temporary loss of the overflow parking currently used by the automobile dealership during construction of GBIS. Maintenance accessibility associated with operation of the drop structure would be minimal (i.e., nothing could be built over drop structure), but the lot would be returned to use. No long-term impacts to employment are anticipated regarding acquisition of the parking lot at 1098 West Riverside Drive. For further discussion of the impacts of the GBIS alignments, and the process for considering the staff recommended GBIS Alignment to be forwarded for approval, refer to Section 1.5.2.2 of this Final EIR.

Response to Comment AJ1-19

Table 3.16-5 has been revised in this Final EIR (Section 2) to include Pollywog as a recreational facility within 2 miles of GBIS. Section 3.13 of the Draft EIR provides mitigation measures that would reduce construction noise levels from GBIS. Mitigation measures NV-MM-1 and NV-MM-2 would reduce construction noise levels by 5 decibels or more at adjacent sensitive receptors. If construction noise levels disturb animals, including horses, mitigation measure NV-MM-5 would allow the community to address this issue to the City and the City would be required to resolve the issue. The analysis of the potential for construction and operational recreation impacts is discussed in Sections 3.16.2.2 and 3.16.2.3 of the Draft EIR. The Draft EIR acknowledges that potential loss of recreational resource could occur at the Valley Heart Shaft Site. As stated in page 3.16-39 of the Draft EIR, placement of an ATF at the Valley Heart Shaft Site could affect the access location of the equestrian trail that currently exist on the site and would be considered a significant impact. Although mitigation was proposed in the Draft EIR (Section 3.16.2.3) that would reduce impacts to recreation, this Final EIR includes additional mitigation measures to reduce further the impacts to recreational uses from the loss of

equestrian-related recreational area at the Valley Heart Shaft Site (Section 2 of this Final EIR). As noted by the commenter, portions of the recreation section mischaracterized the operation at the Valley Heart Shaft Site. Other portions of the section (Section 3.16.2.3 of the Draft EIR) did correctly identify the ATF at the Valley Heart Shaft Site (and its impacts). Section 2 of this Final EIR has noted the revisions necessary to correct the section and additional mitigation measures have been proposed to reduce further potential recreational impacts at the Valley Heart Shaft Site. Refer to Section 1.5.2.2 of this Final EIR for a description of the staff recommended GBIS Alignment, which does not include the Valley Heart Shaft Site.

Response to Comment AJ1-20

Information on the estimated construction trips for the Riverside East Shaft Site were inadvertently omitted from Table 3.17-22 in the Draft EIR. The trip generation estimate for this shaft site would be identical to the estimates for other shaft sites on the GBIS North Alignment. A corrected version of Table 3.17-22 is provided in this Final EIR. These corrections do not result in additional impacts or changes to Draft EIR conclusions. In addition, as detailed in Section 1.5.2.2 of this Final EIR, Riverside East is not being recommended as a shaft site.

It is acknowledged that, if the GBIS North Alignment were implemented, construction traffic would travel on residential as well as non-residential streets in Burbank to reach two of the shaft site locations proposed under the GBIS North Alignment (Riverside West and Valley Heart). Garden Street would be used for access to the Riverside East site, but it is noted that the site also includes frontage on Riverside Drive itself. Similarly, the cul-de-sac segment of Bob Hope Drive would be used for access to the Riverside West Shaft Site but it is noted that the site also includes frontage on Riverside Drive. Also, both the proposed Valley Heart and Riverside West shaft sites would be located within 0.5 mile of the Buena Vista Street/Bob Hope Drive interchange on the Ventura Freeway. If the GBIS South Alignment or the staff recommended GBIS Alignment (see Section 1.5.2.2 of this Final EIR) were implemented, neither of these shaft sites would be used and project-related traffic would primarily use Forest Lawn Drive (lying entirely outside of Burbank) to gain access to the proposed Travel Town and Barham shaft sites in this area of GBIS.

Riverside Drive, which would be a primary access route to these sites, is classified as a secondary arterial west of Buena Vista Street (adjacent to the proposed Riverside West Shaft Site) and as a collector street east of Buena Vista Street (adjacent to the proposed Valley Heart Shaft Site). Although commercial vehicle traffic is prohibited on Riverside Drive west of Alameda Avenue, the Burbank Municipal Code, like that of the City of Los Angeles and other cities, specifically allows trucks and commercial vehicles to use restricted streets when necessary.

active shaft site on the GBIS project. Although this estimate is equivalent in both alignments, the increased truck traffic has a greater negative impact on the GBIS North Alignment. The Barham and Travel Town sites associated with the South Alignment would utilize Forest Lawn Drive. At the Barham site, Forest Lawn Drive has four travel lanes, a median and two parking lanes. At the Travel Town site, Forest Lawn Drive has a controlled stop at Zoo Drive, two parking lanes, a median, several turning lanes and convenient freeway access.

In contrast, the shaft sites for the GBIS North Alignment would use streets with much less capacity. The streets to be used for the Riverside East Site are not included in the analysis presented on Table 3.17-22. The cells for the streets to be used and for the projected traffic trips are empty. This analysis needs to be completed in the Final EIR. Nevertheless, the construction traffic for the Riverside East site would use either Riverside Drive where it is narrow and has no shoulder or parking lanes, or the narrow two lane residential Garden or Davis streets. The Valley Heart Site would use the narrow two-lane residential Valley Heart Drive and Reese Place. The Riverside West site would have access to Riverside Drive, but would also impact the residential cul-de-sac of Bob Hope Drive. In all cases for the North Alignment shaft sites, the over 400 construction traffic trips would occur in residential areas.

AJ1-20

AJ1-21 Additionally, since the Valley Heart shaft site is located in an equestrian community, there are often horses that share the local streets. The problem is exacerbated when the horse trails are blocked by construction at the Valley Heart shaft site. The GBIS North Alignment would place over 100 truck trips on the same streets that the horses travel, creating a significant adverse traffic safety hazard, which must be analyzed in the Draft EIR.

AJ1-22 The traffic analysis also does not provide haul routes for the mucking operations, but it does provide some intersection impact analysis on Tables 3.17-19. Generally, the volume capacity ratio (V/C) increases for the North Alignment are much greater than those for the South alignment. While there are significant impacts with both alignments, the rise in V/C ratios for various intersections ranges between 0.174 and 0.843 for the South Alignment, but ranges from 0.343 to 1.009 for the North Alignment. Clearly, the traffic impacts under the North Alignment far exceed those for the South Alignment. The analysis also obscures the fact that the two shaft sites for the South Alignment have convenient freeway access, while the three shaft sites for the North Alignment require long circuitous routes through residential areas to reach the freeway.

AJ1-23 The traffic analysis also does not provide complete data on the parking impacts. The Draft EIR indicates the need for 75 parking spaces and listed streets where on street parking may be displaced. However, this list does not include the residential streets near the Valley Heart or the Riverside East sites, and only one small segment of a street near the Riverside West site. No methodology or analysis is presented to provide background on these conclusions. A complete analysis must be included in the Final EIR to assure that parking impacts are fully analyzed.

AJ1-24 The traffic impacts associated with the North Alignment are severe. A large number of large haul vehicles will be traversing narrow residential streets for a three year period. Construction worker traffic will similarly impact residential streets. Intersection impacts would be as high as an increase of 1.09 V/C ratio which means that project related traffic, in and of itself, will completely overwhelm the capacity of an intersection. Impacts of this magnitude are significant, unavoidable, and much greater than the South Alignment. The Final EIR should make this distinction clear so that the North Alignment emerges as the environmentally inferior alternative.

Response to Comment AJ1-21

The comment states that presence of equestrian traffic in the vicinity of the proposed Valley Heart Shaft Site would result in a significant traffic safety hazard. It is acknowledged that the Valley Heart Shaft Site lies within the Rancho neighborhood of Burbank, where horsekeeping is permitted and that the equestrian facilities are provided both within city streets and on parallel equestrian trails along the Los Angeles River and near the Los Angeles Equestrian Center. Where equestrian traffic exists adjacent to motorized traffic, equestrians travel at the right-hand side of the street similar to cyclists. On portions of Riverside Drive, a separate lane is provided for these users. The design of these facilities and the requirements imposed on all users of the road provide for the separation of equestrian and motorized traffic. The temporary increase in traffic there that would result from selection of the GBIS North Alignment would not pose an unusual traffic safety hazard in this area.

The existing equestrian trail system in this area would continue to be available to riders. The proposed Valley Heart Shaft Site would not obstruct the equestrian trail that runs parallel to the Los Angeles River at this location. As noted in the Draft EIR (page 3.16-30), the proposed Valley Heart Shaft Site would temporarily obstruct the access to the trail (illustrated in Figure 3.2-13 of the Draft EIR) but a similar parallel trail exists 1 block east on Beachwood Drive south of Valley Heart Drive. As mentioned in response to comment AJ1-4, above, Section 2 of this Final EIR includes additional mitigation measures to relocate the potential shaft site and ATF at Valley Heart to a portion of Pollywog that would result in the least impact to the adjacent residences and recreational uses (including equestrian uses).

Response to Comment AJ1-22

Three of the analyzed locations on the GBIS North Alignment would potentially experience a greater increase in V/C ratio than any of the analyzed locations on the GBIS South Alignment. As the comment notes, the impacts of the two GBIS alignments are disclosed in Tables 3.17-19a and 3.17-19b of the Draft EIR and that there is the

potential for impacts to occur on either of the GBIS alignments (refer to Section 2 of the Final EIR for updated tables). The total number of street segments that could experience adverse impacts is similar under either alignment. The adverse traffic impacts that were identified would be the combined result of both project-generated traffic and, where applicable, the potential closure of up to one travel lane in each direction at the analyzed locations. It should be noted that this assumption regarding the potential need to close travel lanes temporarily was made to provide a conservative representation of the worst-case scenario.

The comment refers to the analyzed locations as intersections. As a point of clarification, the analyzed locations are roadway segments.

The commenter's statement that access to the shaft sites on the GBIS North Alignment would "require long circuitous routes through residential areas to reach the freeway," is not accurate. Although the presence of residential neighborhoods along Riverside Drive is acknowledged, as stated in the response to comment AJ1-20, the Valley Heart and Riverside West shaft sites both lie within 0.5 mile of the access point to the Ventura Freeway. Freeway access is also located within approximately the same distance of the other shaft sites in this area (at Riverside East, Travel Town and Barham).

Response to Comment AJ1-23

Section 3.17.3.2 of the Draft EIR (the GBIS North Alignment discussion starts on page 3.17-66) identified the potential for adverse impacts to parking in the vicinity of the proposed construction sites where some amount of on-street parking could be displaced, either by available parking being used by construction workers or by temporary parking restrictions. Increased competition for the remaining available parking would result. It is anticipated that the shaft sites staging areas would provide parking onsite for construction workers. In-street construction sites would, by their nature, not provide any off-street parking for construction workers.

The comment states that the Draft EIR indicates the need for 75 parking spaces. The statement in the Draft EIR that "75 construction workers would be needed" is, however, an estimate of the total number of daily workers needed at each shaft site, assuming continuous tunneling (24 hours per day) with approximately 25 workers per shift. Therefore, the estimated maximum need for parking at each shaft site would be 25 spaces, assuming that each worker drives alone, and not the 75 spaces as stated in the comment. Although it is anticipated that the shaft sites would be large enough to provide parking onsite for construction workers, parking restrictions adjacent to the shaft sites could reduce the amount of on-street parking on immediately adjacent streets.

Response to Comment AJ1-24

As stated in the responses to comments AJ1-20 through AJ1-22, it is acknowledged that the incremental increase in V/C at analyzed roadway segments along the GBIS North Alignment would be greater than those projected at analyzed roadway segments along the GBIS South Alignment and that those streets include residential uses. The total number of adversely affected street segments, however, is similar under either alignment.

The comment states, "Intersection impacts would be as high as an increase of 1.09 V/C ratio." As points of clarification, the analyzed locations are roadway segments (not intersections) and the Draft EIR identifies 1.014 as the highest incremental increase in V/C at an analyzed roadway segment on the GBIS North Alignment.

Summary and Conclusion

AJ1-25

The City of Burbank believes that the Draft EIR is currently inadequate because it fails to disclose and analyze all potentially significant adverse environmental impacts of the GBIS. Further, the Draft EIR fails to provide a comparative analysis of the significant adverse impacts of the GBIS South Alignment and GBIS North Alignment. Such an analysis will clearly show that the GBIS South Alignment is environmentally superior to the GBIS North Alignment. In light of CEQA's mandate that a public agency should not approve a project where feasible alternatives would substantially lessen significant environmental impacts (14 Cal. Code Regs. § 15021), the City of Burbank urges the City of Los Angeles to reject the GBIS North Alignment.

Further, the Draft EIR must be recirculated for public review and comment after all revisions are made because substantial new information will be required to address the City's comments set forth in this letter (see 14 Cal. Code Regs. § 15088.5). Failing to recirculate the Draft EIR after it is revised to: identify the preferred alternative, preferred GBIS alignment and environmentally superior alternative; to adequately address noise, air quality and traffic impacts; and to analyze impacts to human health from exposure to hazardous materials will deprive the public of a meaningful opportunity to review this new information.

We appreciate the opportunity to comment. If you have questions for City of Burbank staff, please contact Rodney Andersen at (818) 238-3931.

Sincerely,

Jef Vander Borght
Mayor

Dave Golonski
Council Member

David W. Gordon
Council Member

Marsha R. Ramos
Council Member

Attachments:
Comment Letter from Mearns Consulting Corporation
Figure 3.4-9 Update

H:\WPDOCS\Vander Borght\L.A. Sewer DEIR - Burbank comment.ltr.doc

Letter AJ1. Signatory – City of Burbank

Page 11

Response to Comment AJ1-25

The commenter is referred to responses to comments AJ1-1 through AJ1-24 for responses that support the adequacy of the analysis of the GBIS alignments. In addition, response AJ1-1 discusses in detail the rationale and section references in this Final EIR that discuss the process for selecting the Recommended Alternative. Response to comment AJ1-1 also discusses the communication that has occurred between the City of Los Angeles and the City of Burbank during the public comment period to be receptive to Burbank's concerns. In addition, as noted in Section 1.3 of this Final EIR, the public comment period was extended to provide additional opportunity for public comment. No new additional analysis is required to address the comments in this letter, nor has substantial new information or new significant impacts been identified; therefore, no recirculation is required. In addition, the Environmentally Superior Alternative (identified from among the four Project Alternatives analyzed in the Draft EIR) was identified in the Draft EIR in Section ES1.9. Alternative 4 was also identified as the Recommended Alternative and is recommended for approval (see Section 1.5.2 of this Final EIR). As part of the Recommended Alternative, City staff has also identified NEIS II West Alignment, Option B and the staff recommended GBIS Alignment (with Optional Alignment A, Riverside Branch) as "preferred" because these alignments have been determined to be less environmentally disruptive as a whole (see Section 1.5 of this Final EIR for further information on the Recommended Alternative).

MEARNS CONSULTING CORP.
ENVIRONMENTAL CONSULTANTS
RISK ASSESSORS

738 ASHLAND AVENUE
SANTA MONICA, CA 90405
CELL 310.403.1921
TEL 310.396.9606
FAX 310.396.6878
EMAIL: MEARNS@MEARNSCONSULTING.COM
WWW.MEARNSCONSULTING.COM

February 3, 2006

via email and US Mail

Mr. Rodney Andersen
Principal Civil Engineer
City of Burbank
275 E. Olive Avenue
Burbank, California 91502

RE: **Comments**
City of Los Angeles, Integrated Resources Plan, Facilities Plan
Draft Environmental Impact Report

Dear Mr. Andersen:

Pursuant to your request and authorization, I have reviewed the Executive Summary, Sections 1, 2, 3.4, 3.10 and 3.11 of the Draft Environmental Impact Report (DEIR) prepared for the Integrated Resources Plan, Facilities Plan on behalf of the City of Los Angeles relative to the Glendale-Burbank Interceptor Sewer (GBIS) North Alignment Options A and B and the GBIS South Alignment.

General Comments

AJ1-26

The DEIR does not identify a Project, instead it presents Alternatives and identifies Alternative 4, Expansion of Tillman to 100mgd with Cisterns, (page ES-22, Section ES1.7.1) as the Environmentally Superior Alternative. Although, the DEIR also identifies Alternative 1, Hyperion Expansion to 500mgd, as the Environmentally Superior Alternative (page ES-24, Section ES1.9) as well. Clarification regarding which Alternative, 1 or 4, is the Environmentally Superior Alternative would be beneficial.

Moreover, the DEIR states that the Preferred Alternative will be identified in the Final EIR in order to consider Public and Agency comments to the DEIR prior to selecting a Preferred Alternative.

Although the stated intent is commendable, it is difficult to provide thoughtful comments on the DEIR without the *a priori* identification of the Project, or Preferred Alternative. Indeed EIRs, pursuant to CEQA guidelines, should identify the environmental impacts of the proposed Project and Alternatives and why the Project is preferred over the Alternatives.

Response to Comment AJ1-26

Sections ES1.9 and 4.5 of the Draft EIR identified Alternative 1 as the Environmentally Superior Alternative. Section ES 1.7.1 incorrectly stated that the Environmentally Superior Alternative was Alternative 4, and this has been corrected in this Final EIR (see Section 2, Modifications and Updates to the Draft EIR below).

The Draft EIR evaluates all four Project Alternatives at a co-equal level to facilitate full consideration and disclosure of impacts. Throughout the development of the IRP Facilities Plan and the IRP EIR, the City has made concerted efforts to involve key stakeholders and concerned publics in the process. The consideration of the four alternatives at a coequal level of analysis facilitates full disclosure of impacts and adheres to the City's objectives of obtaining robust public comments to aid in the identification of the alternative that best meets engineering design needs and addresses public concerns. Following the close of the public review of the Draft EIR and a review of the comments received, City staff identified Alternative 4 as the Recommended Alternative, and a discussion of the rationale is in Section 1.5 of this Final EIR.

AJ1-27

The DEIR does not identify which GBIS Alignment, the GBIS North Alignment Option A or Option B or the GBIS South Alignment, is preferred due to posing less of an impact on the environment. An EIR should evaluate all three GBIS alignment options and present the preferred alignment option on the basis that it poses less of an environmental impact than the alternatives.

GBIS Comments

Page 3.4-8 – The DEIR identifies sensitive receptors as identified by the California Air Resources Board (CARB) yet does not consider the potential impacts on these sensitive receptors of tunneling through soils contaminated with volatile organic compounds (VOCs) and the subsequent release of these volatile contaminants into the atmosphere. Nor does the DEIR consider the potential health impacts on these sensitive receptors of dewatering groundwater contaminated with VOCs and the subsequent release of these VOCs into the atmosphere.

As the number of sensitive receptors that will be potentially exposed to VOCs released from tunneling and dewatering activities is significantly greater along the GBIS North Alignment, regardless of which Option A or B is implemented, the GBIS North Alignment therefore is less environmentally superior than the GBIS South Alignment.

AJ1-28

As the volume of contaminated soils and groundwater that will be encountered during the tunneling and dewatering activities conducted for the GBIS North Alignment, regardless of which Option A or B is implemented, is significantly greater than the volume of contaminated soils and groundwater at the locations associated with the GBIS South Alignment, the GBIS North Alignment is less desirable than the GBIS South Alignment.

Page 3.4-13 – The DEIR summarizes the SCAQMD's MATES-II study and states the cancer risk identified in the MATES-II study within the South Coast Air Basin (SCAB) due to inhalation of toxic air contaminants (TACs) was 1.4×10^{-3}, i.e., where 1.4 people within a population of 1,000 are at an increased risk of developing cancer or adverse health impacts due to exposure to TACs through inhalation.

Furthermore, the DEIR states the MATES-II study attributes 90% of the increased cancer risks to mobile sources including diesel particulate emissions (70%) and VOCs (20%) and the remaining 10% from VOC emissions from stationary sources. Therefore, 30% of the increased cancer risks are attributed to VOC emissions. As the emissions of VOCs from contaminated soils and groundwater underlying the GBIS North Alignment, regardless of implementation of Option A or B, will be greater than the emissions of VOCs from contaminated soils and groundwater associated with the locations of the GBIS South Alignment, the GBIS North Alignment is less environmentally superior than the GBIS South Alignment.

Response to Comment AJ1-27

See response to comment AJ1-1.

Response to Comment AJ1-28

Refer to response to comment AJ1-2, which addresses the comments on the potential for VOCs from groundwater to result in significant health impacts to workers and the public. As discussed in the referenced response to comment, concentrations of VOCs in the groundwater where the GBIS North Alignment would extend is at or below the maximum contaminant level for TCE and PCE, which means that the groundwater does not exceed drinking water standards for those constituents. Because of the very low concentrations of TCE and PCE in the groundwater, no sensitive receptors along the GBIS North Alignment are expected to experience significant health impacts.

As described in the response to comment AJ1-2, the GBIS North Alignment would extend approximately 3,000 feet to 4,000 feet into the outer edge of the site. In this vicinity, TCE and PCE concentrations are up to 5 ppb, which is below the MCL for these constituents. These low concentrations, in conjunction with the standard hazardous materials management practices and worker safety practices described in Section 3.10 of the Draft EIR and response to comment AJ1-2, are not expected to result in significant impacts related to volatilization of TCE and PCE from groundwater seepage. Similarly, because the concentrations of VOCs of concern (TCE and PCE) in the groundwater are at or below the applicable MCL, any incidental volatilization of the VOCs or TACs from either groundwater or soils is expected have minimal, if any, impacts related to increases in cancer risk in the region.

Furthermore, compliance with SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) would help to minimize VOC releases from excavated soil during construction. This rule would require a mitigation plan to be submitted to the SCAQMD prior to any excavation of VOC-contaminated soil. After excavation

Page 3.10-2 – The primary contaminants of concern identified in the Superfund areas are tetrachloroethylene (PCE) and trichloroethene (TCE). Potential sources of PCE and TCE in groundwater were identified, but conspicuously absent was any mention of aerospace industry, the single biggest contributor to PCE and TCE pollution in groundwater underlying Burbank, i.e., within the San Fernando Valley Superfund Site.

The DEIR does not mention that residual concentrations of volatile organic compounds (VOCs) such as PCE and TCE that are adhered to clay particulates in the soil at depth will volatilize when exposed to the atmosphere. As the depth of the tunneling is expected to be between 15 to 180 feet below ground surface (bgs) the probability that workers will be exposed to concentrations of PCE and TCE both in the soil column and in the vapor phase is great.

AJ1-29 Additionally, the DEIR does not mention the probability that concentrations of PCE and TCE in groundwater underlying the areas to be tunneled as part of the GBIS Alignments will volatilize as the overburden is removed during the tunneling, exposing workers to concentrations of PCE and TCE in the vapor phase.

Moreover, the DEIR does not mention the proximity of the GBIS to residences on Elmer Street, Hood Avenue, Griffith Park Drive, Garden Street, and school children at Oakwood Elementary, Rio Vista School, St. Charles Catholic School, Providence High School, and infirm at St Joseph's Medical Center that also may be exposed to PCE and TCE in the vapor phase during tunneling and dewatering activities.

Adding concentrations of PCE and TCE to the atmosphere in Burbank will contribute to the health risk of the residents, especially the sensitive populations such as children, the elderly and the infirm. This potential health effect of the GBIS Alignment is not discussed in the DEIR.

AJ1-30 Page 3.10-11 – The DEIR states that approximately 44 of 89 sites identified on government databases within the GBIS Alignment corridors have soil and/or groundwater contamination. However, the DEIR does not differentiate between those sites within these 44 that are gasoline service stations with total petroleum hydrocarbon (TPH) contamination emanating from leaking underground storage tanks (USTs) and therefore, relatively low risk versus those sites that are Superfund sites and presumably pose greater risk to human health due to the types of chemicals and concentrations of chemicals detected in soils or groundwater.

AJ1-31 Page 3.10-21 – The DEIR indicates that dewatering might be required if groundwater is encountered during tunneling. Although the DEIR briefly mentions that disposal of contaminated groundwater encountered during dewatering would be mitigated by appropriate testing and treating, there is no mention of mitigating the risk posed to human health due to exposure of the contaminated groundwater.

begins, the excavated soil must be monitored for VOC concentrations every 15 minutes. When the monitored VOC concentration is 50 ppm or higher, the stockpiled soil must be sprayed with water or vapor suppressant and covered with plastic sheeting. When the monitored VOC concentration is 1,000 ppm or higher, the soil must be sprayed as soon as possible and either placed in sealed containers or transported offsite within 15 minutes.

Also see response to comment AJ1-1 for a discussion of CEQA requirements for identifying the Recommended Alternative.

Section 1.5.2.2 of this Final EIR discusses the GBIS alignment that the City of Los Angeles is recommending for approval. Response to comment AJ1-1 also discusses the process and rationale for the staff recommended GBIS Alignment discussed in this Final EIR. The staff recommended GBIS Alignment discussed in this Final EIR, and recommended for approval, would use the eastern portion of the GBIS South Alignment and, therefore, would not require tunneling through the area of contamination at the site. Also see the response to comment AJ1-2 for more discussion on the extent of contamination.

Response to Comment AJ1-29

The commenter correctly points out that the TCE and PCE are identified as the primary contaminants in the groundwater underlying portions of the City of Burbank in Section 3.10 of the Draft EIR. The Draft EIR did not identify past aerospace industries are the biggest contributor to the contamination, because the identification of the source would have no effect or bearing on how contaminated groundwater would be managed, if encountered.

Regarding the comment that the Draft EIR does not mention that VOCs could adhere to clay particles and volatilize during the excavation process, thereby exposing workers to these contaminants (either in the tunnel or above ground), the responses to comment AJ1-2 above addresses these potential concerns.

Regarding the comment that the Draft EIR does not mention the proximity of the GBIS to residents, schools, and the infirm at nearby medical centers, the commenter is incorrect. Sections 3.12.2.2 and 3.13.2.4 of the Draft EIR discuss the sensitive receptors in the GBIS study area, which includes the aforementioned land uses. In addition, as discussed in response to comment AJ1-2 above, the concentrations of TCE and PCE in the groundwater that the GBIS North Alignment would extend into ranges from 0 to 5 ppb, which is at or below the MCL (drinking water standard) for those constituents. Because the concentrations of TCE and PCE are below the applicable MCLs, incidental volatilization is not expected to result in significant health and safety impacts to sensitive receptors or residents of the City of Burbank. Section 1.5.2.2 of this Final EIR discusses the GBIS alignment that the City of Los Angeles is recommending for approval. Response to comment AJ1-1 also discusses the process and rationale for the staff recommended GBIS Alignment discussed in this Final EIR. The GBIS alignment discussed in this Final EIR and recommended for approval would use the eastern portion of the GBIS South Alignment and would therefore not require tunneling through the area of contamination at the site. Also see the response to comment AJ1-2 for more discussion on the extent of contamination.

Response to Comment AJ1-30

The commenter correctly points out that page 3.10-11 of the Draft EIR identifies that 44 of the 89 potential sources of contamination within the GBIS corridor have either soil or groundwater contamination. Although the Draft EIR does not specifically characterize or categorize the contamination at the 44 sites as low risk or high risk, Section 3.10.3.2 the Draft EIR does acknowledge that there is a potential to encounter contamination along the alignments, including the potential to encounter contaminated groundwater associated with the site. The same section of the Draft EIR also discusses measures that would be employed to manage contamination that is encountered, including avoiding the contaminated plume, testing and treating water prior to discharge, and using construction methods that minimize dewatering, such as using an earth-pressure tunneling machine. Furthermore, as stated in the Draft EIR (page 3.10-42) a project-level Health and Safety Plan and a Sampling and Analysis Plan will be prepared and implemented at the appropriate time after a final approval of the staff recommended alignment is made. In addition, the portion of the groundwater contamination through which the GBIS North Alignment would extend has TCE and PCE concentration levels at or below the 5 ppb (the MCL for these constituents), which means the groundwater meets drinking water standards for these constituents. Because the groundwater does not exceed the MCL for TCE and PCE, the groundwater contamination is not considered a high risk source of contamination. Section 1.5.2.2 of this Final EIR discusses the GBIS alignment that the City of Los Angeles is recommending for approval. Response to comment AJ1-1 also discusses the process and rationale for the staff recommended GBIS Alignment discussed in this Final EIR.

The GBIS Alignment discussed in this Final EIR and recommended for approval would use the eastern portion of the GBIS South Alignment and would therefore not require tunneling through the contaminated area.

Response to Comment AJ1-31

The response to comment AJ1-2 addresses this comment regarding potential health risks related to exposure to contaminants in groundwater associated with GBIS.

AJ1-32 The DEIR states that methane gas concentrations would be kept low so as not pose an explosive hazard, although, specific mitigation measures are not identified.

AJ1-33 Page 3.11-66 – The DEIR states that construction of the GBIS North Alignment (Option A or B is not specified) crosses closer to the groundwater plume, i.e., the San Fernando Valley Superfund Site, Area 2, pursuant to the June, 2003 delineation of the groundwater plume than does the GBIS South Alignment.

Furthermore, the DEIR states the tunneling activities could act as a preferential pathway for contaminated groundwater thereby increasing groundwater contamination into areas with lower contamination levels or extending the plume at higher rates than would otherwise occur.

The GBIS North Alignment, therefore, would increase the extent of contaminated groundwater, identified as a Superfund site, which would require more federal, State and local monies to remediate. In essence, the GBIS North Alignment would be creating significant environmental pollution of an uncontaminated resource, i.e., groundwater heretofore not impacted by the San Fernando Valley Superfund site.

AJ1-34 Therefore, the GBIS North Alignment, regardless of implementation of Option A or B, is less environmentally superior than the GBIS South Alignment.

Please do not hesitate to contact me is you have any questions at 310.396.9606.

Very truly yours,

Susan L. Mearns, Ph.D., REA II 20032

Response to Comment AJ1-32

As stated in Section 3.1.1 of the Draft EIR, the project will be designed, constructed and operated following all applicable laws, regulations, ordinances and standards. Applicable regulations include the Tunnel Safety Orders of the state Department of Industrial Relations Division of Industrial Safety which stipulate, among other things, "Special safety measures, including those set forth in [CCR, Title 8] Sections 7965 to 7976, inclusive, those established by the division and board and adopted by the board, or special orders written by the chief or his representatives shall be observed in construction of gassy tunnels in addition to regular rules, orders, special orders, or regulations." For example, during tunneling for NEIS I, management of gas hazards included monitoring of gas concentrations in the tunnel, ventilation of the tunnel, probing ahead of the tunnel boring machine to test for gas. Depending on gas concentrations, gassy zones were grouted. No additional measures beyond the stated compliance are necessary to mitigate methane risks for GBIS. Because these measures are required, they are not considered mitigation.

Response to Comment AJ1-33

As discussed on page 3.11-66, during construction of the GBIS North Alignment, the void between the tunnel exterior and the surrounding soil would be filled with a concrete-based grout that would have a lower permeability than the surrounding soil. This would reduce the possibility that the tunnel could serve as a preferential pathway to groundwater contamination. In addition, Section 3.11.3.3 of the Draft EIR states that the sewer tunnels would not result in significant impacts related to the migration of existing groundwater contamination.

Section 1.5.2.2 of this Final EIR discusses the GBIS alignment that the City of Los Angeles is recommending for approval. Response to comment AJ1-1 also discusses the process and rationale for the staff recommended GBIS Alignment discussed in this Final EIR. The GBIS

alignment discussed in this Final EIR and recommended for approval would use the eastern portion of the GBIS South Alignment and would therefore not require tunneling through the superfund contamination.

Response to Comment AJ1-34

Comment noted. Section 1.5.2.2 of this Final EIR discusses the GBIS alignment that the City of Los Angeles is recommending for approval. Response to comment AJ1-1 also discusses the process and rationale for the staff recommended GBIS Alignment discussed in this Final EIR. The GBIS alignment discussed in this Final EIR and recommended for approval would use the eastern portion of the GBIS South Alignment and would therefore not require tunneling through the contaminated area.

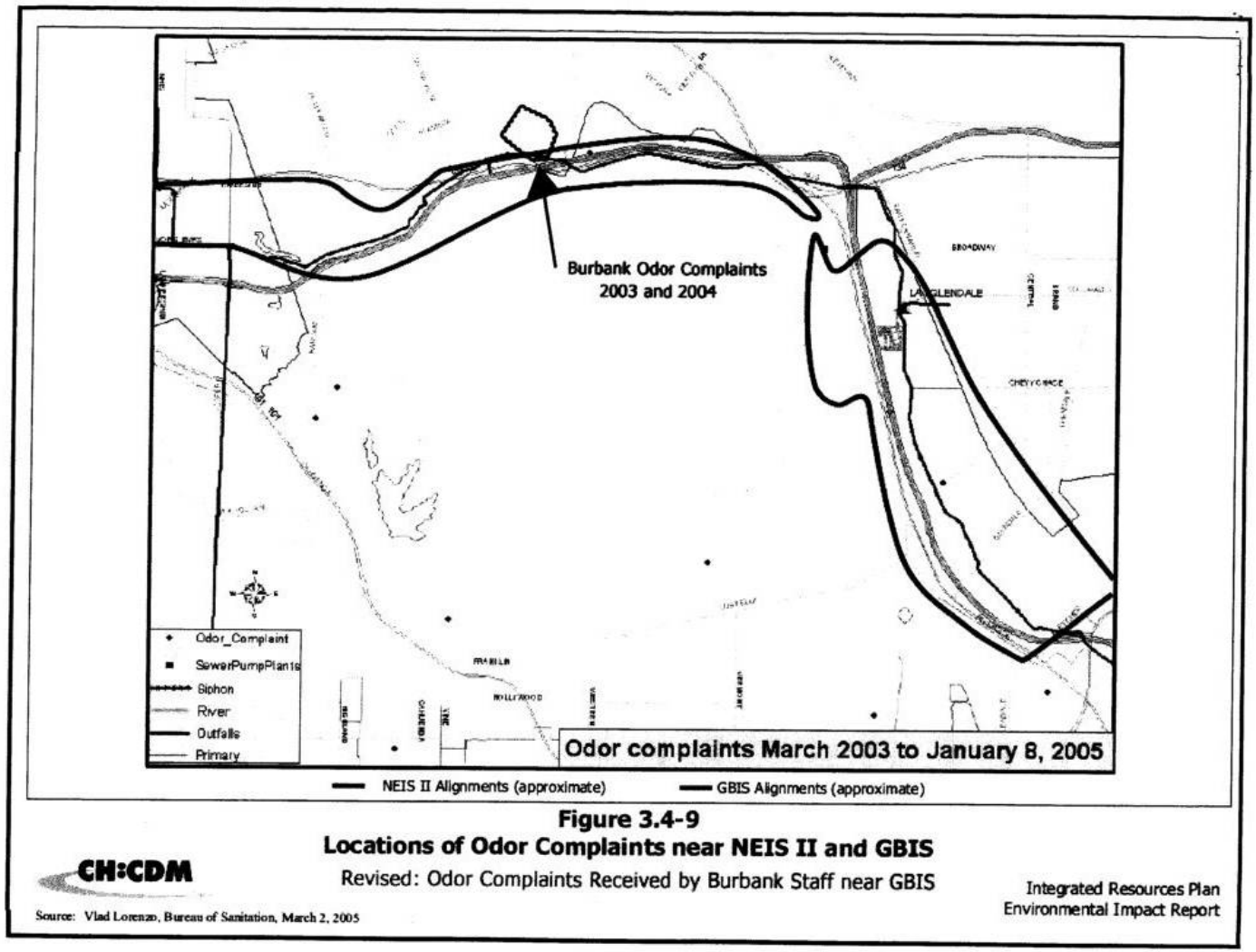

Figure 3.4-9
Locations of Odor Complaints near NEIS II and GBIS
Revised: Odor Complaints Received by Burbank Staff near GBIS

CH:CDM

Source: Vlad Lorenzo, Bureau of Sanitation, March 2, 2005

Integrated Resources Plan
Environmental Impact Report

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, OFFICE OF PUBLIC
TRANSPORTATION AND REGIONAL PLANNING
IGR/CEQA BRANCH
100 SOUTH MAIN STREET
LOS ANGELES, CA 90012
PHONE (213) 897-3747
FAX (213) 897-1337

Flex your power!
Be energy efficient!

January 3, 2006

Mr. Jawahar P. Shah
City of Los Angeles, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, CA 90065

Re: ***Integrated Resources Plan, Draft EIR***
IGR/CEQA 051201/EA SCH#2004071091

Dear Mr. Shah

We acknowledge receipt of the Draft Environmental Impact Report (DEIR) prepared for the proposed Integrated Resources Plan (IRP). The IRP is an integrated facilities plan for the City's wastewater, stormwater, and recycled water program for the year 2020 and beyond. After a review of the information received, we have the following comments.

- We just wanted to remind you that any work on State right-of-way would need an encroachment permit from this Department. Additionally, If access to freeway on/off ramps would need to be restricted for open trenching during construction, detour plans would need to be developed and approved by our Office of District Traffic Manager.

AJ2-1

- We acknowledge the City would continue to its current practice to limit new truck trips during off-peak commuting periods. New truck trips to be generated by expansions of Hyperion and/or Tillman wastewater plants would continue to depart the site between the hours of 10:00 PM and 2:00 AM and return the following day between the hours of 11:00 AM and 2:00 PM.

If you have any questions, you may reach me at (213) 897-3747 and please refer to our record number 051201/EA.

Sincerely,

CHERYL J. POWELL
IGR/CEQA Program Manager
Caltrans, District 7

"Caltrans improves mobility across California"

Letter AJ2. Signatory – Department of Transportation – District 7

Response to Comment AJ2-1

Section 1, Table 1-3, of the Draft EIR recognizes the California Department of Transportation's (Caltrans) authority related to the proposed Caltrans Maintenance Yard Shaft Site, as well as actions and approvals related to granting easements through Caltrans right-of-way and review of project designs that could affect state highways.

The practice the commenter acknowledges of limiting new truck trips to off-peak commuting hours (departing between 10:00 PM and 2:00 AM and returning between the hours of 11:00 AM and 2:00 PM) is specific to the hauling of biosolids from Hyperion (section 3.17.2.2 of the Draft EIR) and would continue under biosolids handling upgrades (Section 3.17.3.2 of the Draft EIR). Because Tillman is a reclamation plant with no biosolids handling occurring at the site, minimal truck trips would be associated with operation; therefore, no such off-peak commuting restrictions would apply.

Letter AJ3. Signatory – City of Glendale

From: "Oillataguerre, Maurice" <MOillataguerre@ci.glendale.ca.us>
To: <IRP-EIR@san.lacity.org>
Date: Thu, Feb 23, 2006 3:59 PM

Dear Sir/Madam:

The City of Glendale would like to submit the attached documents as formal comments to the DEIR. We are also sending original, signed copies via FedEx.

Thank you for giving us the opportunity to submit comments.

Sincerely,

Maurice Oillataguerre

Senior Environmental Program Specialist

City of Glendale Public Works Dept.

633 E. Broadway, Room 209

Glendale, CA 91206

Tel: (818) 548-3944, x8463

Fax: (818) 242-7087

moillataguerre@ci.glendale.ca.us

February 21, 2006

Mr. Jawahar P. Shah
City of Los Angeles
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, CA 90065

RE: Comments of City of Glendale on the Los Angeles Integrated Resources Plan Draft Environmental Impact Report

Dear Mr. Shah:

The City of Glendale ("Glendale") appreciates the opportunity to comment on the Integrated Resources Plan Draft Environmental Impact Report ("DEIR") dated November 30, 2005 released by the City of Los Angeles ("Los Angeles"). Glendale reviewed the DEIR and supports the development of a plan that will be beneficial for both cities. The purpose of this letter is to notify Los Angeles of Glendale's key areas of concern regarding the draft EIR so that Los Angeles may address them in the final EIR. Glendale's primary concerns are summarized as follows.

1. The EIR Should Support Expansion of Water Recycling

AJ3-1 Glendale fully supports Los Angeles' commitment to water recycling and urban runoff water management which was highlighted throughout the document. Glendale would like to continue its partnership with Los Angeles to plan and ensure proper management of our natural resources. The DEIR is a step in the right direction.

For over 35 years Glendale has invested a great deal of money and effort in the recycled water system which distributes water from the Los Angeles – Glendale Water Reclamation Plant ("LAG" or "LAGWRP") to golf courses, schools, and cemeteries among others. The recycled water system consists of 20 miles of pipe, six pump stations, and 5 storage facilities, and currently meets over 4 percent of Glendale's total water demand. Additional uses have been identified, and Glendale expects to increase the use of recycled water in the future.

LAGWRP is the only source of recycled water to Glendale. The water supplies from LAGWRP are very important to Glendale because they displace potable water that would otherwise be purchased from the Metropolitan Water District ("MWD"). Without reclaimed water Glendale would be more dependent on imported water from MWD, not only stretching the finite supply of imported water, but also dramatically increasing the cost to City residents. Consequently, any proposal to diminish or eliminate the capacity of LAG or restrict its ability to meet increased recycled water demand would have a tremendous negative impact to Glendale.

For this reason, in reviewing the four alternatives presented in the draft EIR, Glendale finds that only Alternative 2, which allows for the expansion and upgrade of LAGWRP to

Response to Comment AJ3-1

All of the Project Alternatives include recycled water storage at LAG, which could store recycled water during low demand times for subsequent use during high demand times; hence, all the alternatives would increase the potential for recycled water use at LAG. In addition, under the Recommended Alternative (Alternative 4), advanced treatment has been included for LAG if regulatory or other triggers require process upgrades at LAG. With increased capacity at Tillman, wastewater and recycled water storage at LAG, and possibly advanced treatment at LAG, the Recommended Alternative will result in increased recycled water generation and use. Your comment of support of the IRP concept and preference for Alternative 2 is noted and is included in this Final EIR for review and consideration of decisionmakers.

30 million gallons per day, to be acceptable. This alternative would further ensure the availability of recycled water for use in both Glendale and Los Angeles. For this same reason, Glendale supports those portions of the plan that are discussed in the EIR that would use recycled water for ground water recharge.

AJ3-1

2. The EIR Should Note that Glendale Is 50% Owner of LAGWRP

LAGWRP was built in the 1970's as a joint venture between the Cities of Los Angeles and Glendale. The operation of the plant is governed by a Joint Powers Agreement (JPA) between the two cities. Even though Glendale is clearly stated as part owner of the plant in the JPA, the draft EIR fails to mention this very important fact throughout the document. The EIR should make reference to Glendale's ownership of the plant when discussing LAGWRP. Further, the EIR should also state that any capital improvement projects at the plant need to be approved by Glendale, as governed by the JPA between the two cities.

AJ3-2

3. The EIR Should Correct the Error that LAGWRP Capacity is 15 mgd

Glendale disagrees with the EIR stating the capacity of LAGWRP as 15 mgd. This issue has been discussed with Los Angeles staff on numerous occasions. The Notice of Preparation (NOP) incorrectly included this same error, which Glendale pointed out in its August 1, 2005 letter to Los Angeles. The NOP states that "Both Tillman and LAGWRP are currently undergoing construction of nitrification-denitrification process units required to meet new Los Angeles River discharge limits. ...The treatment capacity at LAG may be reduced from 20 mgd to 15 mgd." Thus, the NOP itself acknowledges that the treatment capacity was 20 mgd at the time the NOP was prepared, and the change to 15 mgd only "may" occur.

AJ3-3

During a meeting on November 14th, 2005, several management-level Los Angeles employees assured Glendale staff that the biological nutrient removal project was completed and it would not be necessary to derate the plant to 15 mgd. It was stated at that time that the plant could actually treat more than the 20 mgd design capacity. Therefore, the EIR should correctly state that the capacity of LAGWRP is now, and was at the time of the issuance of the NOP, 20 mgd. In accordance with CEQA Guidelines Sec. 15125(e), the capacity of 20 mgd constitutes "the existing physical conditions" that the EIR should have addressed.

One consequence of using the correct value would be that the EIR would not incorrectly overstate the impacts from increasing capacity of the plant to 30 mgd in Alternative 2. The 20 mgd value would also provide a more accurate description of the existing

Letter AJ3. Signatory – City of Glendale

Page 3

Response to Comment AJ3-2

The information on the joint ownership of LAG has been added to Section 1.4.2 of the Draft EIR. The authority of Glendale to approve capital improvement projects at LAG has been added to Table 1-3 of the Draft EIR. The requested modifications to the Draft EIR can be found in Section 2 of this Final EIR.

Response to Comment AJ3-3

LAG continues to undergo modifications to the plant processes to remove nitrogen from the effluent to meet discharge requirements to the Los Angeles River. At the time the NOP was issued, there was a likelihood that the plant would have to be derated, because the nitrification-denitrification (NdN) process would have required additional retention time. Because the possibility that LAG (and Tillman) could be derated has been an ongoing issue, the IRP Facilities Plan took a conservative approach and assumed that some level of derating would occur as a result of NdN, so that planning for adequate wastewater treatment capacity could occur. The IRP Facilities Plan forms the basis for the project description in the Draft EIR and the expansion capacities of LAG and Tillman proposed under the various alternatives factor in the possibility that derating could occur.

The Draft EIR, like the IRP Facilities Plan, assumes that both LAG and Tillman will be derated as a worst-case scenario. This is because at the time the NOP was released, this was a possibility. The potential for derating of the plants affects only the timing of expansion under the alternatives. Because the IRP will use various triggers, such as designated plant inflows, to determine if and when to implement capacity expansion, expansion would occur at a later time than if the NdN program causes derating providing LAG and Tillman are not derated (or derated to a lesser degree than assumed in the Facilities Plan and Draft EIR).

AJ3-3 benefits of using reclaimed water from the plant and of saving energy from transporting untreated effluent.

4. The EIR Should Analyze Effects of Increasing LAGWRP Capacity to 50 mgd

Glendale does not understand why the proposed LAGWRP expansion under Alternative 2 is only to 30 mgd. As stated above, this would be only a 10 mgd increase in capacity from the current rating of 20 mgd, whereas the EIR considers a 36 mgd increase at Tillman and a 50 mgd increase at Hyperion. Glendale will be required to pay 50 percent of the costs associated with upgrading the plant, so Glendale believes that if Alternative 2 is chosen, then it would make much more economic sense to double the capacity to 40 mgd, or consider increasing it to 50 mgd, which is the "Stage 2" level envisioned in the 1973 agreement that established the JPA. In 1989, Los Angeles' Wastewater Program Management Division procured the services of a consortium of consultants to prepare a "Concept Report for the LAGWRP 50 MGD Expansion." This report showed that the technical site and facility elements necessary to expand the plant to its originally desired capacity would be feasible and cost-effective. This report further represents the ultimate intent by both cities to expand, rather than reduce, the use of this facility.

AJ3-4

Increased capacity at LAGWRP would enhance the amount of reclaimed water that can be produced at the plant and sold to local customers. Increasing the amount of water that can be recycled beyond the 53,200 acre-feet listed under Alternative 2 would improve the environment by reducing importation of water from the Colorado River. In addition, additional capacity would enable Glendale to treat polluted storm water that may need to be diverted to the plant, as future trends suggest may be required. The EIR addresses low flow diversions of storm water to other portions of the sewer system, so including such diversions to LAGWRP should also be considered. Having LAGWRP rated at 40 to 50 mgd would allow for storm water to be treated at LAGWRP in the future if needed. The extra capacity at LAGWRP would also alleviate wet-weather capacity surcharges in the conveyance pipes discharging to Hyperion, creating further environmental benefits.

AJ3-5 Use of the plant for full treatment would be environmentally preferable to eliminating future capacity increases by routing effluent around the plant or using it only for purposes of treating a portion of the flow because of the wasted energy costs of transporting untreated effluent all the way from LAGWRP to Hyperion.

Response to Comment AJ3-4

Regarding the capacity of LAG under Alternative 2, Alternative 2 includes capacity increases (based on the derated capacity) at both Tillman and LAG. Tillman would be increased to 80 mgd and LAG to 30 mgd, for a total treatment capacity increase of 31 mgd under Alternative 2. During development of the IRP, and the systemwide alternatives that were developed under that plan, systemwide wastewater flows (within the Hyperion Service Area) were projected based in part on SCAG's future population projections. Recycled water demand within the City was factored into the planning process. The treatment capacity expansion proposed for LAG is based on recent anticipated needs of the system. Although a capacity expansion of LAG to 50 mgd was proposed in the referenced Concept Report, and indeed was described in the 1990 Facilities Plan Update, that level of expansion was based on anticipated wastewater flows developed in the late 1980s. The SCAG future population projection used to develop the recent Facilities Plan had a higher level of population growth projected for out years than the more recent projections. In addition, the success of LADWP's water conservation program has effectively resulted in a decrease in per capita water consumption (and therefore wastewater generation) since the time of the Concept Report and the earlier Facilities Plan Update.

The Project Alternatives include low flow diversions in the coastal areas. Alternative 1 also includes low-flow diversions of surface drainages to the sewer system in the inland area. In addition to low-flow diversions, the Proposed Alternatives also propose managing dry weather runoff generated in the City of Los Angeles with urban runoff plant and/or treatment wetlands. Because there is a minimal amount of area within the City that could drain to LAG, low-flow diversions from these areas to the wastewater collection system were not considered under any of the Project Alternatives. If using LAG for such purposes is of interest to the City of Glendale, the City of Los Angeles would aid the City of Glendale in assessing the viability of treating urban runoff at LAG.

Response to Comment AJ3-5

The Project Alternatives all include NEIS II, which would provide hydraulic relief of the NOS downstream of LAG. Wastewater flowing within the City's interceptor system is conveyed to Hyperion by gravity, and wastewater conveyed past LAG would not require energy input for conveyance downstream. Diverting more effluent to LAG is currently not desirable, because the recycled water that is not used is discharged to the Los Angeles River with an expended energy cost. If in the future there is an increase in recycled water demand from LAG, then flow in the NOS that is routed into the plant can be increased to accommodate that demand.

5. The EIR Should Analyze Impacts to LAGWRP from Brine Discharges from Tillman and Burbank Wastewater Treatment Plants

AJ3-6 Page 3.11-47 in the draft EIR discusses a preliminary analysis that was completed to determine if Hyperion would be affected by brine discharged from upstream plants. Glendale does not understand why such a study was not conducted on LAGWRP. Also, Glendale believes that the constituents studied, total suspended solids, total dissolved solids, and total nitrogen are not the only constituents of concern. Advanced treatment (microfiltration and reverse osmosis, "MFRO") will undoubtedly cause other pollutants to enter the brine stream. If Tillman is upgraded to MFRO, a considerable amount of brine would be discharged to the NOS and potentially treated at LAGWRP. Also, Burbank may upgrade its wastewater treatment plant to MFRO in the future. Glendale strongly believes that these brine discharges will affect the operation of LAGWRP in a negative manner. Further, it does not make sense to, for example, remove metals from the influent at Tillman and then pay to have the same metals removed again at LAGWRP (the same applies to Burbank discharges). Therefore, all Alternatives should include provisions for diverting brine discharges around LAGWRP to Hyperion.

6. The EIR Should Consider Upgrading LAGWRP and Maintaining Its 20 mgd Capacity Under All Alternatives

AJ3-7 Glendale is surprised that only one alternative includes upgrading LAGWRP. All four alternatives include upgrading Tillman to advanced treatment. Glendale believes that upgrading LAGWRP should be just as important as upgrading Tillman. The DEIR does not explain why upgrading Tillman is more important than upgrading LAGWRP. All alternatives should include upgrading LAGWRP to advanced treatment.

AJ3-8 MFRO treatment at LAGWRP provides important environmental benefits and should be included in each alternative and in the final adopted plan. With these treatment processes in place, we can meet existing and upcoming Total Maximum Daily Load limits that may be established for the Los Angeles River. The environmental benefits of adding these processes include reducing adverse impacts on water quality of the river, maintaining supply of reclaimed water to our customers, and reducing energy use from discharging unused treated effluent to the sewer. These and other benefits of these improvements at LAG should be addressed in the EIR. Adverse impacts should be shown for alternatives that do not include them.

AJ3-9 Glendale has invested tens of millions of dollars in LAGWRP over a thirty year period. Therefore, Glendale intends to maximize its investment in LAGWRP to ensure that the

Response to Comment AJ3-6

The commenter is correct that constituents other than total suspended solids, total dissolved solids, and total nitrogen are constituents of concern in brine that is generated from MF/RO. However, these constituents are used as the basis for analysis in the Draft EIR because they would be likely to result in the greatest impacts to treatment processes. In the long term, brine discharge from Tillman would be to the VSLIS sewer that would convey brine to GBIS, NEIS II and ultimately to Hyperion. Because the brine would not enter the NOS (from which LAG draws its influent) it would not affect LAG's treatment processes.

In the near term, if advanced treatment is implemented at Tillman before VSLIS is implemented, brine from Tillman will be discharged to the Valley Outfall Relief Sewer/Additional Valley Outfall Relief Sewer, which flows to the NOS in the Valley Village area of the San Fernando Valley portion of the City of Los Angeles. In the Toluca Lake area, some flow from the NOS is diverted to the La Cienega – San Fernando Valley Relief Sewer that travels beneath the Santa Monica Mountains. The NOS upstream from this diversion also accepts substantial flow from other major interceptor sewers. Because brine that is ultimately discharged to the NOS from Tillman would be diluted with other wastewater and because a substantial amount of flow would be diverted from the NOS, and would avoid LAG, any impact or disruptions to LAG's treatment processes is expected to be minimal. Similarly, cost associated with treatment of small amounts of undiverted Tillman brine at LAG are expected to be minimal. However, to ensure that LAG's treatment process and recycled water quality is not adversely affected, a brine study will be conducted (based on brine quality from an MF/RO pilot study at Tillman in the future) on LAG, and if necessary, operational parameters will be established for advanced treatment at Tillman to ensure that no impacts to LAG would occur. Mitigation measure WQ-MM-1 has been revised to reflect this commitment (Section 2 of this Final EIR).

Response to Comment AJ3-7

The commenter correctly points out that the Project Alternatives all include process upgrades to advanced treatment at Tillman but that only Alternative 2 includes upgrades to advanced treatment at LAG. Because Tillman plays a much greater role than LAG in managing wastewater within the City's system, all Alternatives include advanced treatment at Tillman to ensure that Tillman effluent can meets future discharge requirements (to the Los Angeles River). Because LAG represents a small portion of the overall treatment capacity within the City's system, there is less of a need from a wastewater management perspective, to include advanced treatment. In addition, as described in Section 2.3.1 of the Draft EIR, the Alternatives were developed with key input from stakeholders and the alternatives analyzed in the Draft EIR represent a reasonable range of alternatives. However, the City has identified Alternative 4 as the Recommended Alternative for approval and implementation (see Section 1.5 for a description of the Recommended Alternative and its selection process). As part of the identification of Alternative 4 as the Recommended Alternative, the option of adding advanced treatment at LAG has been incorporated (see Section 1.5 of this Final EIR for further details).

Response to Comment AJ3-8

The City agrees with the commenter that MF/RO at LAG can provide environmental benefits, conditioned upon the beneficial reuse of the advance treated effluent; therefore, the City has proposed such for LAG under Alternative 2. Although Alternatives 1, 3, and 4 (as described in the Draft EIR) did not propose upgrading LAG to advanced treatment, an advanced treatment option has been added for LAG under the Recommended Alternative. In addition, the Project Alternatives include recycled water storage to allow operational flexibility at LAG.

The Draft EIR does not identify adverse water quality impacts related to the Project Alternatives that do not upgrade LAG because LAG would not discharge to the Los Angeles River water that does not meet permit or future TMDL requirements. The assumption in the Draft EIR regarding LAG under Alternatives 1, 3, and 4 is that effluent that is not recycled would be discharged back to the sewer or LAG's treatment would be scaled back to match the recycled water demand. This assumption would ensure that not implementing advanced treatment at LAG under Alternatives 1, 3, and 4 would not result in adverse water quality impacts. It should be noted that recycled water storage at LAG would be included under Alternatives 1, 3, and 4, and this storage would facilitate increased recycled water usage from LAG by allowing recycled water to be stored temporarily during periods when recycled water demand is low. Recycled water storage would further have the advantage of minimizing the amount of recycled water that is discharged to the Los Angeles River because the demand for recycled water is not great enough. In addition, an advanced treatment option for LAG has been added under the Recommended Alternative (see Section 1.5 of this Final EIR). The water quality impacts and impacts associated with energy use for each Project Alternative is described in Section 3.4 (Air Quality), 3.11 (Hydrology and Water Quality), and 3.18 (Utilities and Service Systems) of the Draft EIR. It should be noted that the City has identified Alternative 4 as the Recommended Alternative (see Section 1.5 of this Final EIR), and the option of adding advanced treatment at LAG has been incorporated.

Response to Comment AJ3-9

Comment noted. Any derating that occurs as a result of the NdN program would be coordinated with the City of Glendale.

plant operates at or above 20 mgd in the future, regardless of Los Angeles' other future wastewater system enhancements. Any reduction in rated capacity and/or change in the plant's operation will require coordination and final approval from the City of Glendale.

AJ3-9

7. The EIR Should Note Adverse Consequences on Amalgamated Agencies if LAGWRP is Derated

Amalgamated agencies in the LAGWRP service area pay for treatment based on three parameters: flow, strength, and conveyance (or distance to the plant). So, the EIR should analyze the effect of derating LAGWRP to 15 mgd as it would impact Glendale, Burbank, San Fernando, and numerous other amalgamated dischargers in the San Fernando Valley, who would have to pay substantially more to have their waste treated at Hyperion.

AJ3-10

8. The City of Los Angeles Should Rectify Problems with Notifying Glendale Residents

Los Angeles failed to mail out the "Notice of Availability" literature for this draft EIR to City of Glendale residents who live along proposed pipeline alignments and who would be severely affected by pipeline construction. To attempt to avoid this problem and ensure that the affected citizens of Glendale were given proper notice, representatives of Glendale met with numerous representatives of Los Angeles on Thursday, June 2, 2005 at 10:00 am at the Los Angeles City offices on Spring Street. Los Angeles' manager stated that "all Glendale residents living within 1,000 feet of the alignments" will be mailed the Notice of Availability. He told Glendale representatives that if we wanted, we could provide an additional list of interested parties (i.e. homeowner's groups, business groups, etc.) and they would be more than happy to mail out the letter to them as well. Glendale faxed Los Angeles a list of such groups shortly after the meeting.

AJ3-11

In fact, Los Angeles never mailed notices to Glendale residents living within 1,000 feet of the alignments. Glendale became aware of this problem upon receiving several telephone calls from Glendale residents in our Rancho area who complained that only their Burbank and Los Angeles neighbors received the letter. Apparently Los Angeles must have forgotten that it promised to mail out the letters without any input from Glendale. Subsequently, Los Angeles was provided with a list of Glendale residents within 1500 feet of the alignments and a representative stated that the letters would be mailed on Monday, February 6th, 2006. This only gives our residents a 2 ½ week time period to review the draft EIR, which is an inadequate time period to review such a large project that would affect our neighborhoods so severely. Glendale requests that Los Angeles mail out all future notices to affected Glendale residents in a timely manner.

Response to Comment AJ3-10

The Draft EIR does not analyze the effects of derating LAG because derating is neither proposed by, nor would result from, the Project Alternatives. Rather, the possibility that Tillman and LAG would be derated would be attributable to the NdN processes being added to the plants to comply with recent effluent discharge requirements and would be addressed in separate CEQA compliance, as needed.

Response to Comment AJ3-11

The commenter correctly points out that Glendale residents were not initially sent the NOA dated November 30, 2005. As detailed in Section 1.2 of this Final EIR, the City of Los Angeles, in compliance with CEQA, sent the NOA to over 8,000 agencies, organizations, and interested persons. This distribution included residents within 500 feet of the NEIS II and GBIS alignments within the City of Los Angeles, and publication of the notice in a newspaper of general distribution. In addition, several coordination meetings had occurred between staff of the City of Glendale and the City of Los Angeles prior to the release of the Draft EIR. The referenced meeting on June 2, 2005, was focused on Contract Agency financial issues; however, an update of the IRP was presented. As indicted by the commenter, in early February 2006, Glendale staff sent the City of Los Angeles several mailing lists of residents that Glendale wanted to receive the NOA. By February 6, 2006, the NOA was sent to all persons on the provided lists. On February 27, 2006, a second Draft EIR information notice was sent to all parties that received the NOA, including recipients on the lists provided by Glendale, which included an announcement that the public review period for the Draft EIR was extended to March 31, 2006. The public comment period for the Draft EIR was 120 days, which exceeded the 45-day minimum review time under CEQA.

9. The EIR Should Clarify that the Southern GBIS Alignment is Environmentally Superior

The Glendale-Burbank Interceptor Sewer (GBIS) North Alignment alternative would cause unavoidable significant adverse environmental impacts to Glendale residents and businesses. For this reason, Glendale strongly opposes the northern alignment and we request Los Angeles to reject this alternative. The GBIS North Alignment would create significant construction and operation related impacts on Glendale residents and businesses because it includes construction near Glendale residential properties and businesses. The draft EIR states that equipment noise, odors, dust, and traffic impacts will be unavoidable during the construction phase. In addition, we are particularly concerned about shaft sites located adjacent to Glendale. Construction at the Riverside East and Pecan Grove shaft sites would be extremely disruptive to our residents. The final EIR should clarify that the northern alignment is an environmentally inferior alternative to the southern alignment and should indicate that the Southern GBIS alignment is part of the Environmentally Superior Alternative.

AJ3-12

10. The EIR Should Clarify that the Western NEIS II Alignment is Environmentally Superior

The Northeast Interceptor Sewer Phase II Eastern Alignment (Eastern NEIS II) alternative would also cause unavoidable significant adverse environmental impacts to Glendale residents and businesses over several miles along its alignment. For this reason, Glendale strongly opposes the eastern alignment and we request Los Angeles to reject this alternative. The western alignment passes along the edge of Griffith Park, a much less dense area with much less impact on people. The NEIS II Eastern Alignment would create significant construction and operation related impacts on Glendale residents and businesses because it includes construction near Glendale residential properties and businesses along Seneca Avenue. We are particularly concerned about construction at the Verdant shaft site, drop structure, and air treatment facility. Construction at this site would be extremely disruptive to our nearby residents and operation of the facility would add an unwelcome source of odors. The final EIR should clarify that the eastern alignment is an environmentally inferior alternative to the western alignment and should indicate that the Western NEIS II alignment is part of the Environmentally Superior Alternative.

AJ3-13

If Los Angeles chooses the Eastern NEIS II alignment it would cross Glendale's easement for the North Outfall Sewer (NOS). Glendale would need to investigate further the potential adverse environmental consequences of the eastern alignment before it would willingly grant such an easement.

AJ3-14

Response to Comment AJ3-12

The Draft EIR evaluates the environmental impacts of four build alternatives (Project Alternatives) and the No Project Alternative. The Project Alternatives are systemwide alternatives that are each comprised of wastewater treatment, wastewater conveyance, recycled water, and urban runoff (dry weather and wet weather) components. The GBIS alignments evaluated in the Draft EIR are one of many components that comprise each build alternative. Because the EIR focuses on systemwide alternatives, and because the NEIS II and GBIS alignments are common to all Project Alternatives, the Draft EIR does not identify a particular GBIS alignment as environmentally superior; rather the Draft EIR reserves the term Environmentally Superior Alternative for a systemwide alternative.

The City has combined the two GBIS alignments to reduce concerns about potential impacts associated with either GBIS alignment (as expressed in comments submitted on the Draft EIR), has selected this alignment as preferred, and is recommending it for approval (see Section 1.5.2.2). The staff recommended GBIS Alignment would be constructed from the Pecan Grove Shaft Site, Travel Town Shaft Site, Barham Shaft Site, and Caltrans Maintenance Yard Shaft Site, which are the same shaft sites analyzed in the Draft EIR under the GBIS South Alignment. The Riverside East Shaft Site would not be used under the staff recommended GBIS Alignment. Contrary to the comment, construction will not result in significant unavoidable impacts after mitigation to noise, odor, dust or traffic. It should be noted that the Pecan Grove Shaft Site is located to the south of SR-134 and the Los Angeles River, which separate the Pecan Grove Shaft Site from residences in the City of Glendale, and would be approximately 0.25 mile from these residences. Given that the distance of residences in Glendale are on the order of 0.25 mile, that the SR-134 and Los Angeles River separate the Pecan Grove Shaft Site from Glendale residences, and that noise and air quality mitigation measures identified in the Draft EIR will be implemented, construction at the Pecan Grove Shaft Site is not expected to result in significant effects to residences in the City of Glendale.

11. The EIR Should Clarify that the City of Glendale is a Responsible Agency under CEQA

AJ3-15 Because Glendale has ownership of one-half of the LAGWRP and controls the easement through which the eastern alignment of NEIS II must pass, Glendale has responsibility for carrying out and discretionary approval of the project and therefore is a Responsible Agency under CEQA. Under CEQA Guidelines 15042, "a Responsible Agency may refuse to approve a project in order to avoid direct or indirect environmental effects of that part of the project which the Responsible Agency would be called on to carry out or approve." Glendale requests that Los Angeles correct the EIR to add the City of Glendale as a Responsible Agency.

Our specific comments are contained in the attachment to this letter.

Very truly yours,

Stephen M. Zurn
Director of Public Works

Attachment

cc: James E. Starbird, City Manager
Christina R. Sansone, Sr. Assistant City Attorney
Maurice Oillataguerre, Sr. Environmental Program Specialist
Jake Amar, Environmental Program Administrator

Response to Comment AJ3-13

The commenter's opposition to the NEIS II East Alignment is noted. Section 3 of the Draft EIR analyzes the potential environmental impacts of both NEIS II alignments. The NEIS II East Alignment stays within the City of Los Angeles, which includes the Verdant Street Shaft Site. Construction activity at the Verdant Street Shaft Site would be confined to that proposed site, with haul routes likely along San Fernando Road, which is generally lined with commercial land uses in the vicinity of Chevy Chase Avenue. In addition, residences within Glendale boundaries are expected to be far enough away from the Verdant Street ATF that odor impacts are not anticipated. As detailed in Section 1.5.2.1 of this Final EIR, staff is recommending the NEIS II West Alignment with Option B as the staff recommended NEIS II alignment.

Response to Comment AJ3-14

The commenter is incorrect. The NEIS II East Alignment would not extend into the City of Glendale.

Response to Comment AJ3-15

As noted in response to comments AJ3-13 and AJ3-14, above, the NEIS II alignments would be entirely with the boundaries of the City of Los Angeles and would not require approvals from the City of Glendale. As noted in response to comment AJ3-2, information on the joint ownership of LAG and the authority of the City of Glendale related to approval of improvement projects at LAG has been added to the Draft EIR (refer to Section 2 of this Final EIR).

Attachment to Letter from City of Glendale to Jawahar P. Shah, City of Los Angeles, February 21, 2006

Comments by the City of Glendale on the Los Angeles Integrated Resources Plan Draft Environmental Impact Report

General Comments

AJ3-16 The EIR's description of what is the proposed project and what are the alternatives is unclear. CEQA Guidelines Section 15121(a) notes that "*An EIR is an informational document which will... describe reasonable alternatives to the project*." The EIR should be revised to indicate what is being proposed, why, and what the alternatives are to that proposal.

AJ3-17 The origin of the alternatives and their components should be explained. For example, Section 2.3 should explain why the particular treatment expansion values were chosen for the various alternatives and how do they relate to or satisfy the need to service demand of "*over 511 million gallons per day (mgd) by 2020*" (draft EIR page ES-4)? The EIR should also explain why the various components were chosen to make up the various alternatives and why the chosen components were assigned to each alternative and not to others. Alternatives should be evaluated in such a way as to reduce significant impacts of the project. The EIR should explore the possibility of a different mix of components for any one alternative listed in the document. For example, can expansion of LAGWRP be approved along with expansion of Hyperion or Tillman? If not, why not? The state's Third District Court of Appeals noted 25 years ago in *County of Inyo v. City of Los Angeles* that "*the environmental impact report did not comply with the requirements of the California Environmental Quality Act, because ... the alternatives were not tied to a consistently viewed project.*" This EIR appears to have the same problem in that the project description should inform the public as to all the different possibilities for each project component.

AJ3-18 The comparison of impacts between the project and alternatives is insufficient. Section 15126.6(a) of the State CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to the project that would avoid or substantially lessen its significant effects. It is not clear in the draft EIR that any of the alternatives accomplish this requirement. In most cases, the draft EIR makes little or no distinction between impacts of the alternatives (see, for example, Table ES-1), even though the differences are substantial. For example, not upgrading LAGWRP (Alternatives 1, 3, and 4) could adversely effect future water quality discharged from LAGWRP and would increase dependence on imported water for non-potable uses. The EIR also refers to two different alternatives as Environmentally Superior.

Specific Comments

Executive Summary

ES1.5 Description of Alternatives

AJ3-19 *Page ES-7, first group of bullets.* Please explain why were these alternatives chosen and not others.

Response to Comment AJ3-16

The beginning of Section 1 of the Draft EIR explains that the EIR evaluates the environmental impacts of implementing wastewater treatment and water resources management components documented in the IRP Facilities Plan, and that the Los Angeles City Council will use the EIR to help select an alternative to implement. Section 1.2.2 of the Draft EIR describes the level of analysis of the Alternatives and the future environmental documentation that is anticipated. Section 1.4 of the Draft EIR gives the background of the IRP Facilities Plan process and identifies the four build Alternatives that had been developed through the Facilities Plan process to meet the future wastewater and water resource needs of the City of Los Angeles (in the year 2020). As discussed in Section 2.1 of the Draft EIR, each build alternative is intended to meet the Project Objectives (described in Section 1.3 of the Draft EIR). A detailed description of these systemwide alternatives is provided in Section 2 of the Draft EIR.

Response to Comment AJ3-17

As described in Section 1.4 of the Draft EIR, the IRP Facilities Plan comprises four volumes that describe the facilities planning process, including the project goals and objectives, stakeholder involvement, development of preliminary IRP alternatives, the evaluation and screening of these alternatives, and the final four Project Alternatives that meet the project objectives and identified for further consideration. The 4 volumes include Volumes 1, 2, and 3 that focus on future wastewater, water, and runoff demands and system shortfalls, and Volume 4, that focuses on the process to develop systemwide alternatives that meet future wastewater, water, and runoff needs of the City of Los Angeles. As explained in Volume 4 of the IRP Facilities Plan, the alternatives screening and evaluation process used various environmental and stakeholder considerations to assemble systemwide alternatives that meet the project objectives while minimizing environmental impacts. It should be noted that as part of the IRP Facilities Plan process, the City and Steering Group did consider various mixes of wastewater treatment components for numerous preliminary alternatives. Section 2 of the Draft EIR describes the

Project Alternatives developed from the IRP Facilities Plan process, along with the No Project Alternative as required under CEQA. The No Project Alternative is the baseline for the environmental analysis in the Draft EIR. Additional background information on the Project Alternatives can be found in Section 1.5.1.1 of this Final EIR.

Unlike the LADWP project that was the focus of the 1981 *County of Inyo v. City of Los Angeles* court case (124 Cal.App.3d 1), the Project Alternatives described in the Draft EIR are comprised of distinct project- and program-level components, which make up four reasonably conceived and consistently viewed project alternatives.

Response to Comment AJ3-18

The Draft EIR evaluates all of the Project Alternatives at a co-equal level. In addition, the four Alternatives represent a range of alternatives that are reasonable in terms of both meeting the project objectives and minimizing environmental impacts. Each Alternative is a distinct and separate alternative that can be implemented, and the anticipated environmental effects of each alternative are described. The commenter is incorrect in assuming that not upgrading LAG to advanced treatment (Alternatives 1, 3, and 4 as described in the Draft EIR) could result in adverse impacts to water quality discharged from the plant because all discharges from the plant must meet discharge requirements of the plant's NPDES permit. Although upgrading LAG to advanced treatment under Alternative 2 would improve the quality of the plant's discharge to the Los Angeles River, not upgrading the plant (under Alternatives 1, 3, or 4 as described in the Draft EIR) would not consequently result in adverse impacts in water quality because permit conditions would continue to be met. It should be noted that the option of upgrading LAG to advanced treatment has been added to the Recommended Alternative.

Regarding the comment on the multiple alternatives being identified as the Environmentally Superior Alternative, Alternative 1 was correctly identified as the Environmentally Superior Alternative in Sections ES1.9 and 4.5 of the Draft EIR). Section 2 of this Final EIR includes the revision of the incorrect reference to Alternative 4 as the Environmentally Superior Alternative (from ES1.7.1 of the Draft EIR).

Regarding the comment on the multiple alternatives being identified as the Environmentally Superior Alternative, Alternative 1 was correctly identified as the Environmentally Superior Alternative in Sections ES1.9 and 4.5 of the Draft EIR). Section 2 of this Final EIR includes the revision of the incorrect reference to Alternative 4 as the Environmentally Superior Alternative (from ES1.7.1 of the Draft EIR).

Response to Comment AJ3-19

The Executive Summary of the Draft EIR is intended to provide a brief summary of the Project Alternatives and the anticipated impacts. Section 1.3 provides a listing of the Project Objectives and Section 1.4 provides background information on the IRP Facilities Plan. In addition, the Section ES1.5 on page ES-7 refers the reader to Section 2.3.1 of the Draft EIR for a detailed description of the Alternatives Development Process. As described in Section 2.3.1 of the Draft EIR, 12 preliminary project alternatives were developed to meet the objectives listed in Section 1.3 of the Draft EIR. These preliminary alternatives were evaluated, recombined, and ranked, and the four highest ranked alternatives were carried forward to the Draft EIR for evaluation. Further details of the facilities planning process and Steering Group process is contained in the IRP Facilities Plan.

AJ3-20 There should be an explanation as to why the alternatives differ in the amount of expansion proposed (from 31 to 50 mgd)?

What is the relationship between the amount of expanded capacity proposed (570 to 589 mgd) and the amount needed ("511 mgd")?

AJ3-21 It appears that upgrading and increasing capacity at LAGWRP would meet all the objectives of the IRP stated in the draft EIR (see below). The EIR should explain why it is not included under all alternatives.

AJ3-22 Aren't the "alternatives" among treatment plant expansion locations really "project options," just like the "Optional Alignments" listed on page ES-23? If so, then what are the alternatives to these project options that would reduce adverse impacts? For instance, what are the alternatives that would reduce impacts of building NEIS II and GBIS?

Page ES-8, second group of bullets. Please define "Smart Irrigation."

ES1.6 Areas of Controversy

AJ3-23 *Page ES-18, list of bullets.* The EIR should include the controversy regarding the eastern alignment of the NEIS II pipeline and the northern alignment of the GBIS pipeline.

Page ES-21, 3rd paragraph. This section should note that there does not appear to be any controversy surrounding the expansion of LAGWRP.

ES1.7 Issues to be Resolved

ES1.7.1 Selection of a Preferred Alternative

AJ3-24 *Page ES-22, last paragraph.* The contradiction between the text on this page "…this EIR has identified the Environmentally Superior Alternative (see ES1.8) that, for the Proposed Alternatives evaluated in this EIR is Alternative 4, Expansion of Tillman to 100 mgd with Cisterns" and the text on page ES-24: "On the basis of the analysis conducted in the EIR Alternative 1, Hyperion Expansion is deemed to be the environmentally superior alternative" should be corrected.

AJ3-25 EIR should note that addition of LAGWRP upgrade and expansion to both Alternatives 1 and 4 would be better than either alone because Alternative 2 would reduce impacts and associated controversy regarding expansion of Tillman and Hyperion, and would increase use of recycled water, which would reduce adverse impacts on the Colorado River from increased demand and energy use and emissions from pumping.

AJ3-26 **Table 1: Upgrading and Expanding LAGWRP Meets All IRP Objectives**

IRP Objectives Stated in the Draft EIR	Upgrade and Expansion of LAGWRP
Comply with all regulations protecting	LAGWRP upgrade and expansion adds latest technology

Response to Comment AJ3-20

All Project Alternatives are designed to address the future wastewater needs of the City, while also incorporating recycled water and runoff needs. Treatment plant capacity expansions are typically implemented in modules with a specified capacity to maximize efficiencies in space and processing. Because the Project Alternatives proposes increased treatment capacity at different treatment plants with different capacities, the sizes of each expansion module would vary by treatment plant. For example, the expansion of the secondary clarifiers at Hyperion would occur in 50-mgd modules. Contrast this with expansion modules at Tillman, which would typically be 40 mgd (although half modules may be used), or the expansion modules at LAG, which would typically be 10-mgd capacity. In proposing treatment capacity expansions, any capacity lost through derating from the NdN program would first be corrected by adding secondary clarifier capacity, followed by additional expansion modules.

For Alternative 2, capacity is proposed for LAG to bring the plant up to its next module worth of capacity, which is 30 mgd. If LAG is derated, secondary clarifiers would be added to address the derated capacity loss to restore LAG's 20-mgd capacity, followed by the 10-mgd module expansion. If Tillman is derated, its lost capacity would be restored (to 80 mgd) and advanced treatment would subsequently be added.

Similarly, under Alternatives 3 and 4, Tillman's capacity would be increased to 100 mgd. If Tillman is derated, the 80-mgd capacity (before derating) would be restored by adding secondary clarifiers, followed by an additional half module. If Tillman is not derated, a half module would be added.

Although the quantity of wastewater that is expected to be generated in the Hyperion Service Area in the year 2020 is 511 mgd (Average Dry Weather Flow or ADWF), the Project Alternatives would involve varying levels of treatment plant capacity expansions and process upgrades. Both Tillman and LAG treat wastewater to tertiary levels and discharge solids back into the sewer system. The quantity of solids that

is discharged back into the sewer system is approximately 6.6 percent of the influent. In addition, with upgrades in treatment process at Tillman and LAG proposed under the Project Alternatives, brine from advanced treatment would also be placed back into the sewer system. The IRP Facilities Plan estimates that 25 percent of the influent to Tillman and LAG will be placed back in the sewer system as brine. The solids and brine discharged back into the system will have to be treated farther downstream. The total collective treatment plant capacity proposed by the Project Alternatives (570 to 589 mgd) exceed the projected future ADWF of 511 mgd because they provide additional capacity to safely manage solids and brine that would be discharged back to the system.

Response to Comment AJ3-21

Although upgrading the treatment process at LAG to advanced treatment would meet most of the project objectives, the objectives are not applied at the component level; rather, the project objectives are applied to each Project Alternative in its entirety because the IRP uses an integrated approach to wastewater management. Although each Project Alternative meets the project objectives, they do so with different combinations of capacity expansions at the treatment plants. Capacity expansion at LAG was not included in every Alternative, in accordance with the stakeholder-driven alternatives development process (see the IRP Facilities Plan, Volumes 1 and 4). It should be noted that the City has identified Alternative 4 as the Recommended Alternative (see Section 1.5 of this Final EIR), and the option of adding advanced treatment at LAG has been incorporated.

Response to Comment AJ3-22

Each of the Project Alternatives comprises of a distinct mix of project components that are integrated to meet future wastewater and water resource needs. Alternative 1 focuses treatment plant capacity at Hyperion, whereas Alternative 2 focuses treatment capacity expansion upstream in the system at Tillman and LAG. Each alternative proposes expansion of treatment capacity at specific existing plants, and the location of capacity expansions is not changeable (within a given Alternative). Thus, the capacity expansions are not options, as indicated in the comment letter. The NEIS II and GBIS components, which each have multiple alignments options, are common to all Project Alternatives. NEIS II and GBIS are required to provide hydraulic relief to the NOS, which is one of the City's oldest sewers that also serves portions of Burbank and Glendale. As wastewater flows increase over time, the need to relieve the NOS will also increase to avoid wastewater overflows. As such, there are no alternatives that could be implemented that would obviate the need to construct NEIS II or GBIS. There are; however, differences between each of the alignments proposed for NEIS II, or for GBIS. As an example, the NEIS II West Alignment would result in significant impacts in Griffith Park at the Crystal Springs picnic grounds, whereas no such impacts are anticipated under the NEIS II East Alignment. Selection of the NEIS II East Alignment would therefore reduce impacts to a recreational resource. Conversely, surface construction of NEIS II East Alignment before mitigation would result in noise impacts to 28 single-family residences and 14 multifamily residences; whereas surface construction of the NEIS II West Alignment (before mitigation) would result in fewer impacts to single-family residences (15) and multifamily residences (2). Selection of the NEIS II West Alignment would minimize surface construction noise impacts to residences.

Section 2.2.2.3 of the Draft EIR, Dry Weather Runoff (Smart Irrigation), described smart irrigation as irrigation control devices that would monitor and control water use and irrigation. Smart irrigation devices control watering cycles and would prevent or minimize overwatering.

Response to Comment AJ3-23

Prior to the public review of the Draft EIR, controversy regarding the proposed NEIS II and GBIS alignments involved tunnel construction in areas of groundwater contamination (as noted in Section ES1.6 of the Draft EIR). During the public review period for the Draft EIR, additional controversy became apparent, particularly concerning the GBIS North Alignment. The Executive Summary of this Final EIR has been modified to describe the additional items of controversy. Regarding the lack of controversy over improvements to LAG, Section ES1.6 is reserved for discussions of controversial issues associated with the Project Alternatives.

Response to Comment AJ3-24

As noted in response to comment AJ3-18, the typographical error that resulted in conflicting Environmentally Superior Alternatives has been corrected and has been included in Section 2 of this Final EIR. Alternative 1 was correctly identified as the Environmentally Superior Alternative in Sections ES1.9 and 4.5 of the Draft EIR).

Response to Comment AJ3-25

As described above in response to comments AJ3-4 and AJ3-17, and detailed in Section 1.4 of the Draft EIR, during development of the IRP Facilities Plan, and the systemwide alternatives that were developed under that plan, systemwide wastewater flows (within the Hyperion Service Area) were projected based in part on SCAG's future population projections. The four-volume IRP Facilities Plan describes the evaluation and screening of alternatives, including the final four Project Alternatives identified for further consideration. As explained in Volume 4 of the IRP Facilities Plan, the alternatives screening and evaluation process used various environmental and stakeholder considerations to assemble systemwide alternatives that meet the project objectives while minimizing environmental impacts. Additional background information on the Project Alternatives can be found in Section 1.5.1.1 of this Final EIR. Although the upgrade and expansion at LAG is not a component of all four alternatives, this does not preclude the project from occurring at a later date, as the need arises. Such a project would be subject to additional environmental clearance. Although it is uncertain as to whether the commenters statement that there would be a reduction in controversy if Alternative 2 were chosen, the Environmentally Superior Alternative identified in the Draft EIR was not Alternative 2, but Alternative 1. In addition, the alternatives provide different levels of recycled water reuse. Although Alternatives 1 and 4 as described in the Draft EIR do not include process upgrades or capacity expansions to LAG, they do manage recycled water differently. For example, Alternative 1 would generate up to 42,000 acre-feet of water for nonpotable reuse; whereas, Alternative 4 would generate and reuse up to 56,100 acre-feet of recycled water. As described in the Draft EIR, Alternative 4 did not include process upgrades or capacity expansions to LAG. It is important to note, however, that Alternative 4 could manage more recycled water than Alternative 2, which does include process upgrades and capacity expansion to LAG. The option of upgrading LAG to advanced treatment has been added to the Recommended Alternative.

Response to Comment AJ3-26

Refer to response to comment AJ3-21. In addition, although each of the Project Alternatives meets the project objectives, they do so with different combinations of capacity expansions at the treatment plants. Although the upgrade and expansion of LAG would meet many of the project objectives, capacity expansion at LAG was not included in every alternative in the Draft EIR in accordance with the stakeholder-driven alternatives development process (as detailed in response to comments AJ3-25, as well as throughout other response to comments above).

public health and the environment	to meet most stringent regulations.
Meet projected wastewater system needs of the City	Expansion of LAGWRP provides additional capacity for the system.
Protect the public from environmental hazards related to water	Treating effluent at the source reduces the distance that it must be transported, and therefore the likelihood of spills en route.
Maximize system reliability	Expanding LAGWRP adds redundancy to the system, and therefore increases reliability.
Enhance the efficient use of system assets	Upgrading an existing plant would maximize system efficiency.
Conform to sustainability guidelines	Upgrades would apply latest sustainability guidelines.
Enhance the efficient use of natural resources	Glendale's existing recycled water system would be increased by expanding LAGWRP.
Promote water self-sufficiency	Increasing recycled water use in the LAGWRP service area promotes local water self-sufficiency and reduces imports.
Promote outreach on technology and operations	Upgrading LAGWRP would improve technology and operations.
Manage biosolids in accordance with applicable regulations	Improving LAGWRP would not adversely affect management of biosolids.
Provide for safe use of recycled water	Glendale's ability to provide safe use of recycled water, which would be enhanced by upgrading and expanding LAGWRP.
Provide education on the benefits of recycled water	Glendale's extensive education program on the benefits of recycled water would be enhanced by expanding LAGWRP.
Provide education on stormwater (runoff) issues	Expanding LAGWRP would enable polluted stormwater to be treated at the plant.
Protect the ocean, beaches, and watersheds and their associated uses	Treating effluent at upstream plants reduces downstream effluent and thereby improves protection of the ocean, beaches, the intervening watersheds and their associated uses.
Protect air quality	Plant improvements and upgrades would include measures to protect air quality.
Promote environmental justice	Expanding LAGWRP would not disproportionately affect the poor or minorities.
Enhance public lands where possible	LAGWRP expansion would not affect public lands.
Provide services cost-effectively	Los Angeles' 1989 own study showed LAGWRP expansion to be cost-effective.
Allocate costs equitably	The JPA agreement for LAGWRP establishes the means for allocating costs equitably.
Maximize economic benefits to Los Angeles	Cost effective expansion of LAGWRP would be of economic benefit to the entire region.
Maximize external funding opportunities	Expanding recycled water use would help maximize external funding opportunities.

16

ES1.7.2 NEIS II Optional Alignments and ES1.7.3 GBIS Optional Alignments

AJ3-27 *Page ES-23.* Selection of a preferred alignment for these pipelines must be part of the environmentally superior alternative identified in the EIR. The EIR should note that the NEIS II Western Alignment and the GBIS Southern Alignment have fewer and less severe environmental impacts regarding aesthetics, air quality, odors, noise, and traffic on adjacent residents and businesses, and therefore are included as part of the environmentally superior alternative.

Page ES-24.

ES1.8 Unavoidable Significant Adverse Impacts

AJ3-28 Several of the "unavoidable" impacts shown in the table are, in fact, avoidable using alternatives discussed in the EIR. Examples are listed below. The table should be revised to show which significant effects can be reduced by which alternatives.

ES1.9 Environmentally Superior Alternative

AJ3-29 The draft EIR should give more attention to comparing alternatives than it does. For example, the only basis for choosing the environmentally superior alternative appears to be the last line of this paragraph: "On the basis of the analysis conducted in the EIR Alternative 1, Hyperion Expansion is deemed to be the environmentally superior alternative." The basis of that analysis should be discussed.

AJ3-30 The executive summary should show in a matrix the key characteristics of each alternative, such as amount of recycle water, biosolids, and brine generated, amount of imported water avoided, and dry runoff amounts captured. It should then briefly identify which alternative has the fewest significant impacts, perhaps through the use of a second matrix. Then, it should explain why Alternative 1 is superior on the basis of this information.

ES1.10 Summary of Environmental Effects

The EIR should clearly state whether or not the project or any of the alternatives would result in potentially significant or significant and unavoidable impacts. A summary statement to that effect should be included in the executive summary.

Page ES-25, Table ES-1. Table ES-1 in the Executive Summary shows almost all alternatives equal, shows impacts with no associated alternatives. CEQA Guidelines Section 15123(b)(1) requires the summary to identify "Each significant effect with the proposed mitigation measures and alternatives that would reduce or avoid that effect." The table should be revised accordingly.

AJ3-31

The table shows the impacts of all alternatives. A new table should be added that shows the differences between alternatives, not their similarities.

To assist the reader in locating the basis for the findings in the table, a reference should be added to indicate the corresponding section in the Draft EIR on Table ES-1 in the first column "Resource Areas and Alternatives" i.e. "Aesthetics (AES) Section 3.2."

The table should show which pipeline alignment is the cause of the significant aesthetic effects, and which alignments would reduce these effects.

Response to Comment AJ3-27

Because the Draft EIR focuses on systemwide alternatives, and the impacts of the alternatives as a whole, and because the NEIS II and GBIS alignments are common to all the Project Alternatives, neither of the NEIS II or GBIS alignments were identified under the Environmentally Superior Alternative. Subsequent to the close of the public review period for the Draft EIR, the City staff identified Alternative 4 as the Recommended Alternative and is recommending its approval. As part of the Recommended Alternative, City staff is recommending the NEIS II West Alignment (with Option B) and the staff recommended GBIS Alignment (with Optional A – Riverside Branch) as "preferred" because these alignments have been determined to be less environmentally disruptive as a whole (see Section 1.5 of this Final EIR for further information on the Recommended Alternative).

Response to Comment AJ3-28

The Draft EIR analyzes the impacts of systemwide alternatives that comprise different combinations of wastewater, recycled water, and runoff components. Table ES-1 summarizes the unavoidable impacts of the Project Alternatives at a systemwide level. As an example, all four of the IRP build alternatives (Alternatives 1, 2, 3 and 4) would result in unavoidable potential odor impacts in the vicinity of Hyperion, as indicated in Table ES-1 (of the Draft EIR and this Final EIR). However, as the table notes, Alternative 1 would have a slightly greater potential to result in odor impacts because it also would result in increased treatment capacity at Hyperion. This means that selection of an alternative other than Alternative 1 would result in reduced odor impacts, even though those impacts would still be significant and unavoidable. The remaining significant unavoidable adverse impacts listed in Table ES-1 would result from components that are common to all of the Project Alternatives, and thus would not be reduced by any one alternative.

Response to Comment AJ3-29

As discussed in Section 4.5 of the Draft EIR, the basis for determining Alternative 1 to be the Environmentally Superior Alternative was on its lower energy consumption (see Section 3.18.3.3 of the Draft EIR) and associated lower levels of air emissions (see Section 3.4.3.3 of the Draft EIR).

Response to Comment AJ3-30

Comment noted. Tables 2.11, 2.12, and 2.13 in Section 2 of the Draft EIR provide summaries of the key features of the Project Alternatives. Table ES-1 in the Draft EIR, Summary of Environmental Effects, identifies if an alternative would result in significant impacts, presents mitigation measures, and makes a determination of whether the alternative would result in unavoidable adverse impacts. The majority of the potentially significant impacts identified in Table ES-1 of the Draft EIR are associated with components that are common to all of the Project Alternatives, such as the proposed new sewers. Because of this, the environmental impacts associated with the Alternatives do not substantially differ from one another, although there are some differences in impacts related to the location of proposed IRP treatment facilities. For example, all of the Project Alternatives would result in potential odor impacts related to increased wastewater treatment capacity, but the potential for impacts to occur differs depending on where a given Alternative focuses the expansion of treatment capacity. Alternative 1 was identified as the Environmentally Superior Alternative (see Section 4.5 of the Draft EIR) because as a whole, it would result in a lower level of energy usage and the fewer air pollutant emissions.

Response to Comment AJ3-31

Regarding the request for the Executive Summary to contain a summary statement on unavoidable significant impacts, Table ES-1 of the Draft EIR clearly identifies whether residual impacts (by impact resource area) would be less than significant or would be significant after mitigation. If a potential impact was specific to an alternative, that information was also identified in Table ES-1.

Table ES-1 (of the Draft EIR and this Final EIR) identifies anticipated significant impacts of each Project Alternative. Many of the impacts can be mitigated to less than significant levels. Of the significant impacts that cannot be mitigated to a less than significant level, none of them could be avoided by selecting one Project Alternative over another. In the case of odor impacts, Alternative 1 would result in greater potential for odor impacts at Hyperion, as mentioned in Table ES-1. Selecting Alternative 2, 3, or 4 would reduce this potential unavoidable and significant impact, but would not eliminate it. Therefore, an additional table that would show the differences in the alternatives would not be warranted.

The summary of each resource area in Table ES-1 begins with a heading that notes the resource being summarized. Each of these resource areas corresponds with each of the resources areas analyzed in detail in various subsections of Section 3 of the Draft EIR, which corresponds to the Table of Contents and list provided in Section 3.1 of the Draft EIR.

The summary of impacts in Table ES-1 for the Alternatives reflects the most-conservative assessment of impacts for the NEIS II and GBIS alignments. Section 1.5 of this Final EIR describes the process City staff used to identify the staff recommended NEIS II and GBIS alignments based on which of the alignments would be less environmentally disruptive as a whole.

AJ3-32 *Page ES-29, second to last line.* The EIR indicates "Alternative 2 would result in the greatest level of emissions during operation." This conclusion implies that upgrading and expanding both LAGWRP and Tillman (Alternative 2) is worse than expanding Hyperion alone (Alternative 1) or Tillman alone (Alternatives 3 and 4). This conclusion is incorrect because this result is determined by choice of expansion quantities for the three plants. The EIR states that Alternative 1 would generate 16 mgd, Alternative 2 would generate 27.5 mgd, and Alternatives 3 and 4 would generate 25 mgd of brine respectively, apparently based on the assumption that brine would be discharged at a rate of 25 percent of the treatment capacity at the upgraded Tillman and LAG plants. If instead, Alternative 1 included expansion of Hyperion, upgrading of Tillman, and upgrading and expansion of LAGWRP, the brine amount would only be 23.5 mgd, and this new Alternative 1 would still generate the least brine and therefore would cause the least amount of emissions of all the alternatives. Less expansion would be needed at Hyperion with this new alternative, so emissions would be even less than this increase in R/O treatment alone

AJ3-33 would suggest. Thus, it is not the inclusion of LAGWRP upgrading and expansion that causes the significant unmitigatable air emissions, but rather the arrangement of components and choice of expansion amounts for the alternatives analyzed. For this reason, the summary table should show which component is contributing to the identified impact. The EIR should re-arrange the alternative components to show how upgrading LAGWRP would benefit the other alternatives.

AJ3-34 The calculation of air quality emissions under Alternative 2 apparently does not include the reduced energy use that would occur from use of recycled water, which would reduce pumping potable water from the Colorado River. This revision could reduce emissions from Alternative 2.

AJ3-35 Use of recycled water at LAGWRP should be more energy-efficient than at Hyperion, where all
AJ3-36 recycled use is uphill from the plant. The EIR should account for this difference in energy and air emission calculations for these two alternatives.

AJ3-37 The EIR should account for the fact that the change in emissions at LAGWRP should be measured from a 20 mgd existing condition baseline.

AJ3-38 *Page ES-40, top row.* The table should show the much greater impact regarding spills from the alignments adjacent to homes and businesses than the alignments in Griffith Park.

AJ3-39 *Page ES-41, top row.* The table should show the much greater impact on settlement from the alignments adjacent to homes and businesses than the alignments in Griffith Park.

AJ3-40 *Page ES-42, middle row.* The table should indicate which alignments have a greater risk of encountering contaminated soils.

AJ3-41 *Page ES-42, bottom row.* The table should indicate which component of the alternatives would cause the vector problem.

Response to Comment AJ3-32

The Project Alternatives were developed by stakeholders with the purpose of managing future projected wastewater flows to protect public health and safety. Each Project Alternative proposes treatment capacity expansion at one or more specific treatment plants, as described in Section 2.3.3 of the Draft EIR. The expansion of Hyperion, LAG, and upgrades to Tillman, as proposed by the commenter, would likely result in more treatment capacity than is needed to manage anticipated future wastewater flows, given that treatment capacity expansion generally occurs in modules of fixed capacity that is a function of the existing configurations at the treatment plants (see response to comment AJ3-20). In addition, based on the amount of brine (23.5 mgd of brine) that would be produced from the treatment mix recommended by the commenter, the staff recommended alternative would not substantially differ from the alternatives presented in Draft EIR (Alternative 1 would produce 16 mgd of brine, Alternative 2 would produced 27.5 mgd of brine, and Alternatives 3 and 4 would produce 25 mgd of brine).

The estimate of emissions from operation of the alternatives are contained in Section 3.4 of the Draft EIR and is based on the specific components that comprise a given alternative, as described in Section 2 of the Draft EIR. The City concurs with the commenter that it is not solely upgrades or expansion of LAG that result in air emissions that cannot be mitigated, but rather, it is the combination of the components and choice of treatment amounts in a given alternative. Numerous "arrangement of components," including the locations of treatment capacity expansion, in the form of the Preliminary Alternatives, have been considered and evaluated in the Alternatives Development Process summarized in Section 2.3.1 of the Draft EIR and fully detailed in Volume 4 of the IRP Facilities Plan. The four highest ranked "arrangement of alternatives" (also known as the four Project Alternatives) are evaluated in the Draft EIR. As a note, the City has identified Alternative 4 as the Recommended Alternative (see Section 1.5 of this Final EIR), and the option of adding advanced treatment at LAG has been incorporated.

Response to Comment AJ3-33

See response to comment AJ3-32 above.

Response to Comment AJ3-34

The air quality calculations in Section 3.4 of the Draft EIR account for electrical consumption for project- and program-level components that comprise each Project Alternative, including the recycled water component (see footnote to Tables 3.4-58, 3.4-62, 3.4-66, and 3.4-68 in the Draft EIR). The commenter correctly points out that increased recycled water would reduce the need to import potable water from the Colorado River and possibly the State Water Project. Importing water to the City of Los Angeles requires the consumption of electricity at various lift stations along the aqueducts. However, the lift stations are powered from electricity obtained from the power grid, the sources of which are located throughout the United States. Thus, offsets of imported water from the recycled water component of the Project Alternatives, and the associated electricity savings cannot be attributed to power stations located within the South Coast Air Basin. Because of this and because the methodology used to assess air quality impacts in the Draft EIR compares project emissions with the SCAQMD's CEQA significance thresholds for criteria pollutants for the South Coast Air Basin, the criteria pollutant emissions estimates provided in Section 3.4 of the Draft EIR do not include air emission offsets associated with a reduced level of imported water due to higher recycled water usage. Not including these emissions offsets from increase recycled water usage is considered conservative and represents a worst-case air quality analysis.

Response to Comment AJ3-35

Although recycled water from Hyperion would be pumped to West Basin Municipal Water District, which is similar to existing conditions, energy consumption necessary to distribute recycled water in and around LAG may not be more energy-efficient. As distribution is a function of the location of the end users, distance from the plant, and elevation differentials, some of the potential recycled water end users in and around LAG could be upstream of the plant and require similar energy use as with the other plants.

Response to Comment AJ3-36

Quantification of the energy (and air emissions generated) needed to distribute recycled water around the plants is expected to be substantially less than the energy required for advanced treatment and, thus, would not differ substantially among the Project Alternatives.

Response to Comment AJ3-37

The Draft EIR air quality analysis represents a conservative assessment because it assumes an existing throughput of 16 mgd, as reported to the SCAQMD in the LAG Annual Emissions Report. On the basis of this conservative analysis, revisions to the air quality analysis are not necessary.

Response to Comment AJ3-38

As detailed in Section 3.9.3.3 of the Draft EIR, the greatest geological hazards associated with the Project Alternatives is the potential for either of the NEIS II alignments to cross the Hollywood-Raymond fault. Because all the alternatives include a NEIS II component, the summary of potential impacts of the project to significance threshold GEO-1 (Geologic Hazards) on page ES-40 is correctly characterized and consistent with the environmental impacts addressed in the geology section (Section 3.9) of the Draft EIR.

Response to Comment AJ3-39

The commenter is correct that the potential for impacts of ground settlement from tunneling (as detailed in Section 3.9 of the Draft EIR) would affect those portions of either NEIS II (and GBIS) components with structures (regardless of land use) located above the tunnel.

Response to Comment AJ3-40

As described in detail in Section 3.1.1 of the Draft EIR, although the Draft EIR evaluated the impacts of the individual components (i.e., NEIS II and GBIS alignments) to provide an understanding of the general impacts of the components, the "project" as summarized in the Executive Summary and analyzed in the Draft EIR comprises four Project Alternatives and the No Project Alternative. The NEIS II and GBIS alignments are components common to all four Project Alternatives with no distinction or determination made as to which NEIS II or GBIS alignment would be chosen. Therefore, the summary table contains the level of detail appropriate for the Executive Summary. As detailed in Section 3.10.2.2 of the Draft EIR (page 3.10-11), a single environmental database records search was performed for each interceptor sewer "corridor" (i.e. one search for the NEIS II alignments and a similar records search for the GBIS alignments) to determine the baseline conditions of potential existing soil and groundwater contamination in the potentially affected areas. However, as described in Section 3.10.3.2 of the Draft EIR (and related revisions in Section 2 of this Final EIR), the NEIS II West Alignment would go through sedimentary rock that contains less water and is not within the contaminated area.

Response to Comment AJ3-41

The text under significance threshold HAZ-3 (Health Hazards), page ES-42 of the Draft EIR, states that "Alternatives 2 and 4 could result in health nuisances related to mosquito vectors from treatment wetlands." Therefore, the text adequately identifies which component (treatment wetlands, which is a dry weather runoff component) is the potential source of the health hazard.

AJ3-42 *Page ES-45, second row.* Correct the error showing mitigation measure as WQ-MM-1, since this number was used on page ES-44.

Section 2 - Description of IRP Facilities Plan Components and EIR Alternatives

Section 2.2 IRP Facilities Plan Components

AJ3-43 *Page 2-2 first paragraph second sentence.* This sentence incorrectly states the CEQA Guidelines Section as 15626.6(e). It should read 15126.6(e).

AJ3-44 *Page 2-20, first paragraph.* Explain why LAGWRP is considered to be rated at 15 mgd, and not 20 mgd. De-rating of LAGWRP may have the effect of conflicting with Glendale's declared policy as set forth in Ordinance No. 5112, Chapter 13.28 of Glendale Municipal Code, 1995, to "extend and enhance local water supplies by using recycled water for special non-potable purposes to free up potable supplies for higher uses;. . ." GMC Sec. 13.28.010.

Section 3 – Setting, Impacts, and Mitigation

Section 3.5 – Biological Resources

AJ3-45 *Page 3.5-44.* BIO-MM-4 appears to be a deferred mitigation measure, which the courts have ruled as unacceptable.

Section 3.10 – Hazards and Hazardous Materials

AJ3-46 The text in this section should clarify why construction through Superfund sites near City of Glendale residents would not pose a potentially significant impact and why mitigation measures would not be needed.

Section 3.11 - Hydrology and Water Quality

AJ3-47 *Page 3.11-60 and elsewhere.* The different potential for existing contaminated groundwater to migrate as a result of the various pipe alignments should be identified as a significant unavoidable impact. The EIR does not clearly indicate that this potential impact can be reduced to a less than significant level. Rather, it states that "*The permeability of the grouting materials would be lower than that of the surrounding soil types, thereby* ***reducing the possibility*** *that the tunnel would serve as a preferential pathway for contaminant migration*" (emphasis added). It is not clear that this technique would prevent contamination migration and therefore, this impact should be considered significant and unavoidable.

AJ3-48 *Page 3.11-85.* WQ-MM-1 appears to be a deferred mitigation measure, which the courts have ruled as unacceptable.

Section 3.13-5 Noise

AJ3-49 *Page 3.13-5.* "As it relates to noise, the IRP study area includes the majority of the city of Los Angeles and small portions of the cities of Burbank and El Segundo." Considering many miles of pipeline are planned in the streets that form the border between Los Angeles and Glendale,

Response to Comment AJ3-42

The Executive Summary incorrectly identified WQ-MM-1 as a mitigation measure under Environmental Impact WQ-3. Because WQ-MM-1 is not a measure for potential groundwater impacts (discussed under WQ-3), page ES-45, second row, of the Draft EIR has been revised to delete WQ-MM-1 and replace it with "None Required." This correction is consistent with the impacts and mitigation described under Section 3.11.3.3 of the Draft EIR.

Response to Comment AJ3-43

The CEQA Guidelines reference has been corrected in Section 2 of this Final EIR.

Response to Comment AJ3-44

Refer to response to comment AJ3-3 above.

Response to Comment AJ3-45

As described in Section 3.5.3.3 of the Draft EIR, mitigation measure BIO-MM-4 requires surveys for wetlands downstream of the diversion point and upstream of the effluent discharge point of the Dry Weather Runoff – Low Flow Diversions and Dry Weather Runoff – Urban Runoff Plants or Treatment Wetlands. In the event wetlands are present, the diversion point will be redesigned to occur downstream of the wetlands, or a new location would be selected for the URP, treatment wetlands, or low-flow diversion to reduce potential secondary impacts to the extent or quality of wetland and/or riparian habitat in surface waters. As mentioned previously, each program-level component will be subject to additional environmental review once site-specific plans are developed some time in the future. It is appropriate to develop site and component-specific mitigation when the specific location is selected and potential impacts to biological resources can be identified. This is not deferred mitigation (where a future unknown mitigation is assumed to mitigate an impact fully or an essential environmental study is deferred to the future), because the exact location of the program-level component is not known at this

time and potential impacts will be addressed in future environmental review after the project-level component design is developed (Sections 1.2.2 and 3.1.2 of the Draft EIR).

Response to Comment AJ3-46

As described in detail in Section 3.10 of the Draft EIR, contaminated soil and groundwater could be encountered during the installation of the Project Alternatives and components. As it relates to the City of Glendale and its residents, the LAG and NEIS II components are in a delineated area of groundwater contamination, which is currently undergoing cleanup by EPA and other state agencies, including the Regional Water Quality Control Board. Although the construction of the proposed components (particularly the NEIS II alignments) could require dewatering, which could expose the public or the environment to hazardous materials, this hazard would be reduced to less than significant by following applicable regulations (i.e., Health and Safety Plans, OSHA guidelines), by the avoidance of contaminated soil and groundwater plumes (by going around or tunneling below in bedrock), by testing and treating water produced by dewatering prior to discharge, and by using construction methods that minimize dewatering such as earth-pressure-balance tunneling; therefore, by following these regulations, no significant impact is anticipated and no mitigation measures are required. All of these methods were successfully used just south of the proposed NEIS II alignments, during the recent NEIS-ERIS project.

Response to Comment AJ3-47

This comment has been addressed in response to comment AJ1-33.

Response to Comment AJ3-48

As described in Section 3.11.3.2, implementation of advanced treatment technologies (i.e., MF/RO) associated with various IRP components (Tillman and LAG process upgrades) would cause brine to be generated as a by-product. The Draft EIR fully addresses at a project-level of analysis the amount of brine associated with the applicable IRP component based on information in the IRP Facilities Plan and its appendices. However, as also addressed in the Draft EIR, once the technology and design is chosen for the MF/RO facilities, further studies would be completed to address any secondary impacts that could occur, such as the downstream effects of brine on Hyperion, the specifics of which can not be completely assessed without a specific Alternative and technology and design being chosen. As described in Section 3.11.3.3 of the Draft EIR (page 3.11-85) requires a pilot study to understand the effects of brine on downstream treatment processes and to establish operating parameters to prevent treatment process disruptions. Preliminary analysis of the operation of the Project Alternatives indicated that the additional brine generated by advanced treatment would not cause any impacts on the treatment processes at Hyperion. As the effects to the treatment process at Hyperion are not completely known and would depend on the final process design, an additional study will be performed. The City of Los Angeles operates all treatment plants in the Hyperion Service Area and is committed to continued treatment processes maintenance that complies with NPDES permits requirements and other requirements, such as water quality standards for recycled water. Therefore, although the Draft EIR adequately addresses the potential impacts of brine associated with the advanced treatment technologies, mitigation measure WQ-MM-1 (as revised – see Section 2 of this Final EIR) identifies the process the City will use (and has used for past projects involving advanced treatment technologies proposed for the City of Los Angeles' wastewater system) to provide the technical basis to confirm that the water quality standards applicable to Hyperion and/or LAG, as specified in the plant's NPDES discharge permit or otherwise determined by the LARWQCB, will be met. Based on the technology/design chosen, and the findings of the treatment system studies, the specifics of the technology/design can be refined as necessary to ensure compliance with the applicable water quality standards. As such, the subject mitigation measure does not defer mitigation, but rather identifies the timing, mechanism, and process for ensuring that the detailed design and development of the advanced treatment system at Tillman and/or LAG will not result in a significant water quality impact (i.e., water quality violations at the end point of discharge from Hyperion). If the findings of the pilot studies show that the potential for permit violation exists or that such treatment processes would significantly affect the quality of recycled water, advanced treatment would be reconsidered and would not be implemented until potential impacts to treatment process are

addressed. Therefore the requirements set forth in mitigation measure WQ-MM-1 establish the mechanism, parameters and established guidelines to ensure that water quality standards applicable to Hyperion will continue to be met in the event advanced treatment occurs at Tillman and/or LAG, and is not deferred mitigation.

Response to Comment AJ3-49

The cities listed in page 3.13-5 are cities in which one or more of the IRP components would be placed (i.e., a portion of the GBIS alignment would travel through Burbank and some improvements to Hyperion could be located in a small portion of El Segundo). Because none of the components would be located within the City of Glendale, this city was not listed as a city that is part of the IRP study area. However, the Draft EIR considered the potential impacts that the IRP components would have on the City of Glendale.

The sound level measurements were taken at a distance of approximately 4 feet from the equipment at Tillman and LAG.

A scale cannot be applied to the figures because the figures are not to scale. In regards to Figure 3.13-5, the nearest sensitive receptor that would be affected by improvements at LAG are residences to the southeast of LAG. The nearest residence in this neighborhood is approximately 250 feet from LAG.

Table 3.13-7 will be revised to show that the CNEL for Division Street is 64 dBA. Construction noise levels are over 20 decibels more than the CNEL at Division Street. As such, it is not likely that a lower ambient noise level would affect construction noise levels. Additionally, implementation of mitigation measures NV-MM-1 through NV-MM-5 would ensure that construction noise levels would not increase ambient noise levels by 5 decibels or more.

Land uses within the City of Glendale that adjoin the Verdant Street Shaft Site are industrial. No residential uses or sensitive land uses in the City of Glendale are located within close proximity to the shaft site. The nearest sensitive receptor to the Verdant Street Shaft Site is located approximately 220 feet to the northwest of the shaft site, while the nearest residential area in Glendale to the shaft site is located approximately 1,100 feet east of the shaft site. Additionally, the Church of New Hope is located immediately west of the proposed shaft site. The residential area to the northwest and the church would be exposed to similar noise characteristics as the Verdant Street Shaft Site since this residential area is located next to the industrial area in which the Verdant Street Shaft Site is located. As such, the Verdant Street sound measurement site is sufficient to characterize existing noise conditions of the residential area that would be most likely affected by construction at the shaft site and operations of the air treatment facility. No noise measurements were taken in the City of Glendale because no sensitive receptors in the City of Glendale were located in close proximity to the Verdant Street Shaft Site.

Figure 3.13-6 is not to scale and, as such, providing a scale would not accurately depict the distance between the alignment and the various uses in the area. The noise monitoring locations are shown in Figure 3.13-6. Additionally, page 3.13-19 identifies the location in which the noise readings were taken. Additionally, pages 3.13-20 through 3.13-25 describe the land uses that surround the shaft site and identify any sensitive receptors located in close proximity to the shaft sites and would likely be affected by construction noise.

this text, and other text throughout the document, should include Glendale as among the cities affected by this project.

Page 3.13-15, Table 3.13-4. Indicate a distance for the sound level measurements from equipment "on the walkway between equipment." Also applies to Tables 3.13-6.

Page 3.13-17 (Figure 3.13-5). Indicate approximate scale so readers can understand approximate distances to their homes and businesses. Also applies to other figures throughout the EIR.

Page 3.13-19. "..at the short term measurement sites, the CNEL was estimated by increasing the measurement results by 3 dBA." However, Table 3.13-7 shows the CNEL (65) is 4 dBA greater than the daytime Leq (61). Reducing the CNEL to 64 dBA would show the existing background is slightly quieter than reported in the EIR, and impacts would be slightly greater.

Page 3.13-20. Correct Table 3.13-7 per above. Since the site is near "an industrial building" and "railroad tracks", is the Verdant Street measurement site sufficient to characterize conditions in the adjacent residential area of Glendale?

Page 3.13-21 (Figure 3.13-6). Indicate approximate scale so readers can understand approximate distances to their homes and businesses. Add the location of measurement sites listed in Table 3.13-7 so we can understand whether measurements reflect conditions in the community.

AJ3-49 Measurements should have been made in adjacent Glendale sites.

Page 3.13-25, second to last paragraph. "Because the Pecan Grove shaft site is similar to the Griffith park shaft site, a similar noise environment was assumed." However, Table 3.13-28, page 3.13-67, shows the "Ambient Noise Level at Construction Site" to be 63 dBA at Griffith Park and 67 dBA at Pecan Grove. The Pecan Grove ambient level should be 63 dBA. The "Distance from Construction site where Construction Noise Levels would Increase by 5 dBA or More" should increase from 274 ft to 387 ft?

AJ3-50

Page 3.13-73, Table 3.13-30. This table shows the ambient level at the Verdant site, measured at night, as 54 dBA, and the expected level is 88 dBA. This table shows that noise levels at the Verdant site, adjacent to the City of Glendale, would increase by 34 dBA at night. This significant impact is completely unacceptable, and would render housing adjacent to this construction uninhabitable for the construction period. Many more significant noise impacts and significant thresholds must be considered if construction is to occur during the nighttime hours near residents. As a minimum, the EIR should address significant impacts involving loss of sleep, health, and school learning, as well as the secondary impacts on neighborhoods adjacent to construction that would result from these direct impacts.

AJ3-51

Page 3.13-89, Table 3.13-36 Noise and Vibration Component Impact Summary Table. This table should be revised to show that the NEIS II East Alignment would have a much more severe noise impact than the West Alignment, and similarly, the GBIS North Alignment would have greater impacts than the South Alignment, based on the analysis contained in this section.

Response to Comment AJ3-50

Table 3.13-28 has been revised in this Final EIR (Section 2) to indicate that ambient noise levels at Pecan Grove is 63 dBA and that the distance from construction site where construction noise levels would increase by 5 dBA or more is 387.

Response to Comment AJ3-51

Section 3.13.2 portion of the Draft EIR (page 3.13-1) discusses the effects that noise can affect on the human environment, including sleep and hearing loss. Because nighttime noise levels are typically lower than the daytime and would be more disruptive than daytime construction noise levels, ambient nighttime noise levels were used when estimating construction noise levels at the Verdant Street Shaft Site. Although construction noise levels at the Verdant Street Shaft Site would be approximately 88 dBA, implementation of mitigation measures would reduce construction noise levels. The mitigation measures in the Draft EIR would ensure that noise levels during construction would not exceed 5 decibels. Studies have shown that a change of at least 5 decibels would likely evoke a community reaction.

Table 3.13-36 has been revised in this Final EIR (Section 2) to indicate the number of sensitive receptors that would be affected by construction of the NEIS II and GBIS alignments.

Section 3.17 Transportation & Traffic

AJ3-52

Page 3.17-3, paragraph 4. Although most of the roadway segments analyzed for potential level-of-service (LOS) impacts are in the City of Los Angeles, some are located in Glendale. As a result, the assumed 7-percent increase in traffic-carrying capacity on major and secondary streets in accordance with LADOT practices "to reflect the benefits of the existing automated traffic surveillance and control (ATSAC) system" is inappropriate in Glendale because Glendale does not have ATSAC.

Page 3.17-9, Table 3.17-1. It would be helpful if the table indicated the jurisdiction in which each street segment is located as well as whether the street segment is in the vicinity of NEIS II or GBIS.

Page 3.17-11, Table 3.17-1. As cited, Victory Boulevard exists between Sonora Avenue and Justin Avenue. However, it does not exist between Sonora Avenue and Crystal Springs Drive, i.e., southeast of Sonora Avenue, Victory Boulevard "becomes" Riverside Drive.

Page 3.17-9, Table 3.17-1; and Page 3.17-16, Table 3.17-3. The Draft EIR should explain why the number of street segments contained in Table 3.17-1 (citing street characteristics) far exceed the number of street segments contained in Table 3.17-3 (citing traffic volumes). In addition, in Table 3.17-1 street characteristics are provided for 11 street segments on San Fernando Road as far north as Broadway/Brazil Street. However, Table 3.17-3 provides traffic-volume data for none of these street segments; instead, volumes are provided for the next segment to the north, i.e., between Broadway/Brazil Street and Wilson Avenue. There is insufficient information as to why this is done.

Page 3.17-16, Table 3.17-3. The street segments listed in Table 3.17-3 represent the study segments used to assess project-related impacts. The Draft EIR should state exactly what criteria were used to identify these segments.

Page 3.17-19, Table 3.17-5. Refer to Comment No. 1 above, Page 3.17-3, paragraph 4, regarding the assumed capacity of San Fernando Road between Broadway/Brazil Street and Wilson Avenue in Glendale, i.e., assumed capacity of 1,712 vehicles per lane per hour (vplph) per direction versus a capacity of 1,600 vplph per direction without ATSAC. The V/C calculations should be revised accordingly.

Page 3.17-22, paragraph 5. Regarding the significance of construction-related activities, it is cited that "LADOT considers construction-related traffic effects as adverse, but not significant, impacts because such effects, while sometimes inconvenient, are only temporary. Because of this, construction-related traffic effects are discussed but are not considered to be significant." Glendale does not share this significance standard, i.e., short-term, construction-related impacts and long-term, operational impacts are subject to the same standards of significance with respect to traffic-related impacts (including, among other elements, LOS assessments). This is of particular concern on a project that may last several years. The basis for defining the long term construction impacts of this project as "temporary" should be discussed in the Draft EIR.

8

Response to Comment AJ3-52

The comment points out that the City of Los Angeles' automated traffic surveillance and control system (ATSAC) does not include the analyzed roadway segment in the City of Glendale. This omission is acknowledged and the assumed increase in capacity of 7 percent was inadvertently applied to the segment of San Fernando Road between Broadway/Brazil Street and Wilson Avenue. This comment also is relevant to the analyzed roadway segment in Burbank (on Riverside Drive between Bob Hope Drive and Gaylord Drive). The V/C ratio calculations shown in Tables 3.17-5, 3.17-17, 3.17-18a, 3.17-18b, 3.17-19a and 3.17-19b in the Draft EIR have been recalculated and these tables are provided in Section 2 of this Final EIR.

The comment states that it would be helpful if Table 3.17-1 were expanded to indicate the city that has jurisdiction over each roadway segment identified in the table. In response to this comment, an expanded version of Table 3.17-1 is provided Section 2 of this Final EIR.

The comment points out that a street has been misidentified in Table 3.17-1. In response to this comment, the location identified in this table and in Tables 3.17-3, 3.17-5, 3.17-17, 3.17-18a, 3.17-18b, 3.17-19a and 3.17-19b as "Victory Boulevard from Sonora Avenue to Crystal Springs Drive" has been revised to read "Riverside Drive from Sonora Avenue to Zoo Drive" and an updated version of this table is provided in Section 2 of this Final EIR. One other minor revision was also made to the table to clarify the limits of the street description of Riverside Drive north of Glendale Avenue.

The comment requests clarification for the reason that the most northerly segment of San Fernando Road described in Table 3.17-1 terminates at Broadway/Brazil Street while the segment of San Fernando Road that was analyzed is immediately north of there. The data in Table 3.17-1 of the Draft EIR offers a detailed description of the existing physical characteristics and functional classification of the various roadway segments in the vicinity of NEIS II and GBIS. The omission of the segment of San Fernando Road north of

Broadway/Brazil Street was inadvertent and does not affect the analysis presented in the Draft EIR. The characterization of the analyzed segment of San Fernando Road as a 4-lane major street is not in question. An expanded version of Table 3.17-1 is provided in Section 2 of this Final EIR.

The comment also requests clarification of the rationale for selecting the roadway segments that were analyzed in the Draft EIR. As stated on page 3.17-24 of the Draft EIR, "future cumulative conditions during construction were evaluated for all street segments where in-street construction activities associated with components analyzed at a site-specific level could potentially result in temporary lane closures." Analysis was also done at selected locations in the immediate vicinity of these potential closures where the project would divert traffic to alternate routes (such as Ventura Boulevard east of Vineland Avenue) or where it would add construction traffic (such as the analyzed segment of San Fernando Road if the Brazil Street site were used as a construction shaft, instead of the Los Angeles Zoo Shaft Site, the Observatory Annex Shaft Site or the Pecan Grove Shaft Site.)

The comment requests that the existing and projected V/C ratios calculated for San Fernando Road between Broadway/Brazil Street and Wilson Avenue be recalculated without the estimated benefit of the ATSAC system. As stated in the response to AJ3-52, paragraph 1 above, the calculations have been updated and corrected versions of Tables 3.17-5, 3.17-17, 3.17-18a, 3.17-18b, 3.17-19a and 3.17-19b are provided in Section 2 of this Final EIR.

The comment disagrees with the characterization of temporary construction-related traffic impacts as less than significant, stating that the City of Glendale assesses both short-term construction-related impacts and long-term, operational impacts by the same standards of significance. The comment also requests clarification on the basis for defining such impacts as temporary.

The adverse temporary traffic impacts identified in the Draft EIR are distinguished from the operational traffic impacts because they would be related to the project's construction activities and, as such, would be of limited duration. The duration of construction activities at some locations may extend up to three years, while at other locations it would likely be of much shorter duration (i.e., up to six months). The potentially significant operational impacts were considered to be those that could result from anticipated project-related traffic that would occur following completion of the project. While the nature of the specific projects proposed as part of the IRP is such that they would generate much less traffic than would the proposed construction activities, the Draft EIR evaluated potential traffic impacts for both the short-term and long-term conditions.

The City of Los Angeles is the lead agency for the environmental analysis of the proposed IRP and has the discretion to select and apply the thresholds of significance that are used in the evaluation of the project. Staff of LADOT were contacted early in the EIR study process and described that the City's policy is to consider construction-related traffic effects as adverse but not significant on the basis of their temporary nature. The City of Los Angeles applied this policy when assessing other projects, including in *Venice Pumping Plant Dual Force Main Project Draft Environmental Impact Report* (URS for the City of Los Angeles, Bureau of Engineering, December 20, 2005) and the South Airfield Improvement Project at Los Angeles International Airport (*South Airfield Improvement Project Draft EIR*, City of Los Angeles, August 2005). In the latter document, LADOT was quoted as follows: "There is no requirement to assess the temporary traffic impacts of a project resulting from construction activities. The proposal to prepare a traffic study is voluntary."

The City of Glendale has also taken the position that construction impacts are less than significant, for similar reasons. In the traffic analysis for a mixed-use project in downtown Glendale (*Glendale Town Center Draft EIR*, Glendale Redevelopment Agency, December 2003, pages 4.6-19 and 4.6-20), conclusions that such impacts would be less than significant are supported by the statement that "construction truck trips would occur along major roadways with the number of trips being relatively limited" (although peak-hour truck trips were not specifically quantified). That Draft EIR also concluded that construction of the identified off-site traffic mitigation measures would result in less-than-significant impacts because their construction would be short term in nature. While the time frame associated with those construction periods was estimated to range from 2 to 3 weeks to 2 to 3 months, it appears that City of Glendale staff used a similar rationale as is used by LADOT when considering the significance of temporary traffic impacts associated with construction activities.

The comment provides the significance criteria used by the City of Glendale when assessing potential traffic impacts. In terms of allowable increases in V/C ratios, Glendale's criteria are slightly less restrictive than those used by the City of Los Angeles (stated on page 3.17-23 of the Draft EIR). The differences are: (1) that no impact is identified under Glendale's criteria if the final level of service is C or better and (2) an incremental increase of 0.020 or more is considered significant at levels of service D, E or F. Because the V/C thresholds used City of Los Angeles are more restrictive than those used by the City of Glendale, they would result in a more conservative assessment of project impacts. The characterization of temporary impacts, however, as adverse or as significant is at issue here and the City of Los Angeles, as the lead agency for this environmental document, has the authority to apply its own significance criteria.

The comment notes that no cumulative development projects in the City of Glendale were included in the traffic analysis. It states that there are projects in the San Fernando Road corridor of Glendale that are anticipated that should be reflected in the analysis and that the inclusion of an ambient growth factor alone is insufficient to account for traffic that would be generated by those projects.

In preparing the response to this comment, information posted to the City of Glendale's website (www.ci.glendale.ca.us/planning) was reviewed and several specific projects were identified within the San Fernando Road corridor, including a residential project with more than 20 units at 6200 San Fernando Road, an unspecified project at 5500 San Fernando Road and an unspecified mixed-use project at 3673 San Fernando Road. Other information posted to the City of Glendale's website (www.ci.glendale.ca.us/dev-svcs/projects_in_the_works.asp <http://www.ci.glendale.ca.us/dev-svcs/projects_in_the_works.asp>) notes that a long-term master plan for Disney's Grand Central Creative Campus project northeast of the junction of I-5 and SR-134 was approved and that construction is now underway.

Based on comments from the City of Glendale, a temporary adverse impact on San Fernando Road between Broadway/Brazil Street and Wilson Avenue has been identified and noted in Section 2 of this Final EIR. The fact that additional background traffic may use this roadway segment in the future would not change the conclusions that are presented in the Draft EIR and this Final EIR.

As stated in the responses to comment AJ3-52, paragraphs 7 through 9 above, the City of Los Angeles, as the lead agency for this environmental document, has the authority to apply its own significance criteria.

The comment requests that a full review of component impacts cannot be made because trip assignments used in the analysis are not provided in the Draft EIR. In response to this comment, two new tables (Tables 3.17-19a[1] and 3.17-19b[1]) have been prepared to show the number of project-generated trips that were assigned to the local street system during construction of the NEIS II and GBIS components of the IRP project.

The comment notes that the Draft EIR analysis did not identify an impact that is shown in Table 3.19b. It is acknowledged that the analysis presented in the Draft EIR and the revised analysis presented in this Final EIR both show that a temporary adverse impact would occur on San Fernando Road (northbound in the p.m. peak hour). Section 2 of this Final EIR has been corrected to indicate that this impact would occur if the Brazil Street site were used as a construction shaft, instead of the Los Angeles Zoo Shaft Site, the Observatory Annex Shaft Site or the Pecan Grove Shaft Site.

Page 3.17-23, paragraph 3. Glendale utilizes "operational" traffic impact criteria similar to those prescribed by LADOT, but Glendale's criteria—which are applied to both construction-related and post-project conditions (refer to Comment No. 7 above)—are slightly different:

If LOS D, E, or F is forecast with the project and the project's incremental increase in the V/C ratio is 0.020 or greater, an adverse and significant impact is projected.

Page 3.17-24, paragraph 4. The 13 "development growth projects" (listed on page 3.17-25, Table 3.17-6) provided by LADOT do not include any known or approved projects in Glendale. Between 2005 and 2012-2014 (the horizon years of NEIS II-GBIS), there are projects in the San Fernando Road corridor of Glendale that are anticipated, and these should be reflected in the analysis. These projects are of sufficient size to warrant explicit inclusion (as opposed to an apparent implicit inclusion utilizing the 0.82 annual traffic-growth factor).

Page 3.17-26, paragraph 1. As discussed in Comment Nos. 7 and 8 above, Glendale's significance criteria are not the same as those contained in the *Draft L.A. CEQA Thresholds Guide*, City of Los Angeles, 1998. It would seem more appropriate to apply Glendale's criteria to the street segments located in Glendale.

Page 3.17-26, Section 3.17.3.2. A review of Component Impacts cannot be made because whereas trip-generation data are provided, the basis for the precise assignment of project trips (for both the construction and operational phases) is not provided.

Page 3.17-55, Table 3.17-19b. Notwithstanding the capacity-related correction discussed herein, an adverse and significant impact during the p.m. peak hour is, in fact, identified during project construction in the vicinity of NEIS II and GBIS terminating at Brazil Street. Specifically, in Glendale on San Fernando Road between Broadway/Brazil Street and Wilson Avenue, northbound San Fernando Road's V/C ratio of 0.913 (LOS E) without the project (refer to Table 3.17-17) would increase to 0.934 (LOS E) during said construction (refer to Table 3.18-18b). This project-related V/C increase of 0.021 constitutes an adverse and significant impact utilizing Glendale's significance standards (refer to Comment No. 8 above). AJ3-52

Section 4 - Other Environmental Considerations

4.4 Significant Irreversible Impacts

Page 4-7, second paragraph. This section indicates that "Although the Project Alternatives would require numerous resources (raw materials, nonrenewable resources, labor, energy, and money) to construct and operate, it does not represent a substantial irreversible commitment of resources." Please explain the definition of a "substantial irreversible commitment." AJ3-53

Response to Comment AJ3-53

The Project Alternatives would require the construction of various facilities to address and manage future wastewater flows safely while also integrating future water resource needs. The City of Los Angeles is obligated manage wastewater generated in its service area in a safe and efficient manner. Future population growth in the Hyperion Service Area is projected to result in wastewater generation levels that exceed the current system's capacity. In addition, population increases will likely place additional demands on water, and regulations will likely require additional urban runoff management. Because of this, implementation of each alternative would require a commitment of resources required to accommodate future wastewater treatment and conveyance needs, while also increasing recycled water usage and runoff management. The use of the required resources to implement the selected Project Alternative is fully justified. To clarify this, in Section 2 of this Final EIR the term unjustifiable has been added to the referenced paragraph to explain that the use of resources to construct and operate the Project Alternative does not represent an unjustifiable substantial irreversible commitment of resources.

STATE OF CALIFORNIA, RESOURCES AGENCY ARNOLD SCHWARZENEGGER, GOVERNOR

DEPARTMENT OF CONSERVATION

DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES

5816 Corporate Avenue, Suite 200, Cypress, CA 90630-4731
PHONE 714/816-6847 • FAX 714/816-6853 • WEB SITE conservation.ca.gov

RECEIVED
2005 JAN -3 AM 10:51
WASTEWATER ENGINEERING SVCS. DIV.

December 28, 2005

Mr. Adel Hagekhalil, Manager
City of Los Angeles
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, California 90065

Subject: Integrated Resources Plan Draft Environmental Impact Report, SCH# 2004071091, SCAG# 120040466

Dear Mr. Hagekhalil:

The Department of Conservation's (Department) Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California.

The proposed Hyperion Expansion project is located within the administrative boundaries of the Hyperion oil field. There are two plugged and abandoned wells within or in proximity of the project boundaries. These wells are identified on Division map W-1-5 and in records as Chevron U.S.A. Inc. "Hyperion Core Hole" 1 and Edwin W. & R. Pauley "Los Angeles City-Hyperion" 1. The Division recommends that all wells within or in close proximity to project boundaries be accurately plotted on future project maps. AJ4-

Building over or in the proximity of plugged and abandoned wells should be avoided if at all possible. If this is not possible, it may be necessary to plug or re-plug wells to current Division specifications. Also, the State Oil and Gas Supervisor is authorized to order the reabandonment of previously plugged and abandoned wells when construction over or in the proximity of wells could result in a hazard (Section 3208.1 of the Public Resources Code). If reabandonment is necessary, the cost of operations is the responsibility of the owner of the property upon which the structure will be located. Finally, if construction over an abandoned well is unavoidable an adequate gas venting system should be placed over the well. AJ4-

Furthermore, if any plugged and abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the Division's district office must be contacted to obtain information on the requirements for and approval to perform remedial operations. AJ4-

The Department of Conservation's mission is to protect Californians and their environment by: Protecting lives and property from earthquakes and landslides; Ensuring safe mining and oil and gas drilling; Conserving California's farmland; and Saving energy and resources through recycling.

Letter AJ4. Signatory – Department of Conservation

Response to Comment AJ4-1

Section 3200 *et. seq.* of the Public Resources Code regulates the permitting, establishment, completion, and abandonment/reabandonment of gas and oil wells. The City is aware that the Department is the state agency with primary responsibility for the enforcement of these regulations. The Department is also the state agency responsible for conducting construction site plan review for development proposed in proximity to gas or oil wells. During design of any proposed improvements at or in close proximity to Hyperion, the City will accurately plot potentially affected wells.

Response to Comment AJ4-2

Comment noted. Detailed design would include the location of utilities, as well as location of wells, and would be performed prior to building any IRP component. If unrecorded, plugged or abandoned wells are found and cannot be avoided, current Division specifications and requirements would be followed.

Response to Comment AJ4-3

As with design, if unrecorded, plugged or abandoned wells are found during construction activities, current Division specifications and requirements would be followed.

Mr. Adel Hagekhalil, Manager, City of Los Angeles Public Works – Bureau of Sanitation – Wastewater Engineering Services Division
December 28, 2005
Page 2

To ensure proper review of building projects, the Division has published an informational packet entitled, "Construction Project Site Review and Well Abandonment Procedure" that outlines the information a project developer must submit to the Division for review. Developers should contact the Division's Cypress district office for a copy of the site-review packet. The local planning department should verify that final building plans have undergone Division review prior to the start of construction. AJ4-4

Thank you for the opportunity to comment on the Draft Environmental Impact Report. If you have questions on our comments, or require technical assistance or information, please call me at the Cypress district office: 5816 Corporate Avenue, Suite 200, Cypress, CA 90630-4731; phone (714) 816-6847.

Sincerely,

Paul Frost

Paul Frost
Associate Oil & Gas Engineer

Letter AJ4. Signatory – Department of Conservation

Page 2

Response to Comment AJ4-4

Thank you for the information on the Divisions informational packet and review process. Comment noted.

Letter AJ5. Signatory – LA County Department of Public Works

From: "Chong, Suk" <SCHONG@ladpw.org>
To: <hommeje@san.lacity.org>
Date: 2/27/2006 9:00:38 AM
Subject: Integrated Resources Plan - DEIR Comments

Please see attached LA County Department of Public Works comments concerning the DEIR for your City's Integrated Resources Plan:

<<IRPDEIR.pdf>>
Thank you,
Suk Chong
LA County Department of Public Works
Land Development Division
(626) 458-7150

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
www.ladpw.org

DONALD L. WOLFE, Director

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

February 27, 2006

IN REPLY PLEASE
REFER TO FILE: LD-0

Mr. Jawahar P. Shah
City of Los Angeles
Public Works Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, CA 90065

Dear Mr. Shah:

REVIEW OF DRAFT ENVIRONMENTAL IMPACT REPORT
INTEGRATED RESOURCES PLAN
CITY OF LOS ANGELES

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the above-mentioned project. We have reviewed the DEIR and offer the following comments for your consideration:

Section 3.11 - Hydrology and Water Quality

AJ5-1 Page 3.11-13: Table 3.11-5 - Does not include all of the impaired reaches in the Los Angeles River Watershed Management Area. Either include all of the impaired reaches or discuss why only select reaches are included.

AJ5-2 Page 3.11-38: Table 3.11-14 - The information in the Total Maximum Daily Load schedule should be updated.

AJ5-3 Page 3.11-41 - Los Angeles County Flood Control District owns and maintains flood control infrastructure within the City of Los Angeles. Any operational impacts and/or connections to this system will need to be reviewed and permitted by the District.

AJ5-4 Various alternatives in the DEIR identify pumping advanced treated water to Hansen and Pacoima Spreading Grounds. The DEIR needs to evaluate the operational impacts to these flood control facilities due to the proposed alternatives.

Response to Comment AJ5-1

Revisions have been made to Table 3.11-5 from the Draft EIR and included in Section 2 of this Final EIR for the impaired reaches in the Los Angeles River Watershed Management Area that would potentially be affected by the IRP components. This revision does not alter the conclusions of the Draft EIR.

Response to Comment AJ5-2

The information provided in Table 3.11-14 of the Draft EIR was the most current available information at the time of the Draft EIR, even more current than what was available at the time of the NOP (as required under CEQA Guidelines Section 15125). At the time of implementation, the project will comply with all current water quality standards and regulations, including applicable TMDL schedules.

Response to Comment AJ5-3

It is understood that the Los Angeles County Flood Control District owns and maintains the flood control infrastructure within the City of Los Angeles. Table 1-3 (page 1-13) of the Draft EIR identified the County of Los Angeles Flood Control District as the agency responsible for various permits related to drainages and facilities under their jurisdiction.

Response to Comment AJ5-4

As described in Sections 1.2.2 and 3.1.2 of the Draft EIR, program-level components, such as Recycled Water – Groundwater Recharge component, are project(s) that may be implemented as part of the IRP, but these projects do not have specific locations or design details identified. Therefore, when project-specific information has been developed for a program-level component from the adopted and certified Alternative, that project will be subject to subsequent environmental analysis and additional future environmental review.

AJ5-5 Also, if these facilities require regulatory agency permits for construction and maintenance, please coordinate with Public Works during the application process to obtain a complete description of our maintenance activities.

Section 3.18 Utilities and Service Systems

AJ5-6 The DEIR states that the construction of the alternatives would not result in significant impacts to landfills, with respect to construction debris, since it is intended to .recycle construction debris and dispose of any remaining debris at either Bradley West or Sunshine Canyon Landfills. The DEIR concludes that the amount of the construction debris for these alternatives would represent approximately one percent of the combined remaining volume of both landfills. However, the Bradley Landfill has nearly exhausted all its permitted capacity and Sunshine Canyon Landfill is already running at near its operating limit. Thus, the ability of these sites to accept the large volumes of construction debris generated by this project is uncertain. The DEIR needs to address how the proposed project will provide for disposal of solid waste in the event these two landfills are not available for use.

If you have any questions regarding these comments, please contact Ms. Clarice Nash at (626) 458-5910.

Very truly yours,

DONALD L. WOLFE
Director of Public Works

ROSSANA D'ANTONIO
Assistant Division Engineer
Land Development Division

CRN: jmw
P:\CEQA\CLARICE\IRPDEIR

Response to Comment AJ5-5

Refer to response to comment AJ5-3 above. As applicable, the City will coordinate with the County of Los Angeles Department of Public Works to obtain a complete description of County facilities, including maintenance activities, during the application process.

Response to Comment AJ5-6

The 1 percent of the remaining landfill capacity is associated with all of the components within a Project Alternative and includes debris that could be recycled or reused and debris that cannot be recycled. This is extremely conservative because the components associated with each alternative are anticipated to be constructed through the year 2020. As described in Section 3.18 of the Draft EIR, the closing of the Bradley West Landfill is dependent on whether the City of Los Angeles approves an extension. In the event of closure, soils would still be needed to install a soil cap. In the event of an approval, Bradley is still expected to require importing clean soil to serve as operational cover. The estimated closure date for Sunshine Canyon is 2011. As with all activity within the City and County of Los Angeles, existing permitted landfill capacity and future landfill needs and solutions are being actively pursued by sanitary districts and affected local agencies.

It is noted that construction debris would first be recycled or reused, and only remaining unrecyclable material would be disposed. In addition, as discussed in Section 3.18.3.3 in the Draft EIR, much of the construction debris would be concrete debris or clean soil, which is considered inert material. Concrete debris would be taken to aggregate base facilities for reuse and would not likely enter landfills. Clean soil would be used as fill for other projects in the area or transported to one or more landfills and used for cover. If municipal landfills are not taking clean soil for daily cover at the time of disposal, or if other inert material must be disposed of, then the clean soil or inert material would be taken to an inert landfill, including: the Azusa Land Reclamation Company Landfill, the Montebello Land and Waste Company, the Lower Azusa Reclamation Plant, Strathern Sanitary Landfill, and/or the Calmat Class III disposal site. Because adequate disposal options are available for clean soil and inert wastes landfill capacity, the IRP is not expected to result in significant impacts to landfill capacity.

STATE OF CALIFORNIA — ARNOLD SCHWARZENEGGER, *Governor*

CALIFORNIA STATE LANDS COMMISSION
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202

PAUL D. THAYER, *Executive Officer*
(916) 574-1800 FAX (916) 574-1810
California Relay Service From TDD Phone **1-800-735-2922**
from Voice Phone **1-800-735-2929**

Contact Phone: **(916) 574-0234**
Contact FAX: **(916) 574-1324**

December 28, 2005

File Ref: G05-04

Ms. Nadell Gayou
The Resources Agency
901 P Street
Sacramento, CA 95814

Dr. Ara Kasparian
City of Los Angeles
650 S. Spring St., Suite 574
Los Angeles, CA 90014

RE: Integrated Resources Plan Draft Environmental Impact Report, SCH #2004071091

Dear Ms. Gayou and Dr. Kasparian:

Staff of the California State Lands Commission (CSLC) has reviewed the subject document. Under the California Environmental Quality Act (CEQA), the City of Los Angeles is the lead agency and the CSLC is a Responsible Agency for any and all projects that could directly or indirectly affect sovereign lands, their accompanying Public Trust resources or uses, and the public easement in navigable waters.

AJ6-1 The proposed Integrated Resources Plan is the facilities plan for water, wastewater and stormwater related facilities and needs of the area for the year 2020 and beyond. The proposed project includes expansion and upgrade of existing facilities, up to three new interceptor sewers, expanded recycled water distribution systems, and dry and wet weather urban runoff management facilities. The resulting impacts from construction and operation of the various components of the Integrated Resources Plan may have an effect on coastal resources, including those coastal resources within the cities of Los Angeles, Malibu, Santa Monica, Manhattan Beach, Hermosa Beach and Redondo Beach, Rancho Palos Verdes, Palos Verdes Estates and Torrance. Specifically, Santa Monica Bay receives secondary-treated effluent from the Hyperion treatment facility via a 5-mile outfall. Additionally, surface runoff from the highly urbanized areas of the above-mentioned coastal cities and unincorporated areas of Los Angeles County also drains into Santa Monica Bay. The Los Angeles River and its watershed drain into San Pedro Bay and have an impact on coastal resources in Long Beach.

Letter AJ6. Signatory – California State Lands Commission

Response to Comment AJ6-1

Section 3.6 of the Draft EIR addressed in detail the potential impact of the Project Alternatives on coastal resources. The analysis determined that there would be no significant primary, secondary or cumulative impacts of any of the alternatives related to coastal resources. Surface water runoff and potential impacts to surface water is addressed in detail in Section 3.11 of the Draft EIR. The water quality analysis determined that, with incorporation of regulatory standards and mitigation, no significant primary, secondary or cumulative impacts would occur from any of the Project Alternatives. Comment noted.

AJ6-2 The CSLC has jurisdiction and management authority over all ungranted tidelands, submerged lands, and the beds of navigable rivers, sloughs, lakes, etc. The CSLC has certain residual and review authority for tide and submerged lands legislatively granted in trust to local jurisdictions (Public Resources Code §6301 and §6306). All tide and submerged lands, granted or ungranted, as well as navigable rivers, sloughs, etc., are impressed with the common law Public Trust.

The potentially impacted coastal resources may be located on tide and submerged lands, which were legislatively granted to the cities of Los Angeles, Santa Monica, Manhattan Beach, Hermosa Beach, Redondo Beach, and Palos Verdes Estates. In addition, these potentially impacted coastal resources may also be located on ungranted tide and submerged lands under the Commission's direct authority.

Consequentially, please add the following language under section 3.6.3.1 Background, Regulatory Framework:

AJ6-3 The Public Resources Code, Division 6, gives the California State Lands Commission (CSLC) jurisdiction and management authority over all ungranted tidelands, submerged lands, and the beds of navigable rivers, sloughs, lakes, etc. The CSLC has certain residual and review authority for tide and submerged lands legislatively granted in trust to local jurisdictions (Public Resources Code §6301 and §6306). All tide and submerged lands, granted or ungranted, as well as navigable rivers, sloughs, etc., are impressed with the common law Public Trust.

We appreciate the opportunity to comment. If you have any questions concerning the CSLC's jurisdiction, please do not hesitate to contact Jennifer Lucchesi at (916) 574-0234.

Sincerely,

Dwight E. Sanders, Chief
Division of Environmental Planning
and Management

cc: Jennifer Lucchesi

Letter AJ6. Signatory – California State Lands Commission

Page 2

Response to Comment AJ6-2

The jurisdiction and authority of the California State Lands Commission are noted and Table 1-3 of the Draft EIR revised (see Section 2 of this Final EIR).

Response to Comment AJ6-3

Section 2 of this Final EIR includes modification to Section 3.6.3.1 of the Draft EIR to include the requested information.

1158

Board of Supervisors
County of Los Angeles

MICHAEL D. ANTONOVICH
MAYOR

February 24, 2006

Mr. Jawahar P. Shah
City of Los Angeles
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, CA 90065

Dear Mr. Shah:

AJ7-1 I support my constituents in the Cities of Glendale and Burbank in opposing the Glendale-Burbank Interceptor Sewer (GBIS) North Alignment, and I support the proposed South Alignment which will have fewer impacts on residential properties.

Sincerely,

MICHAEL D. ANTONOVICH
Mayor

MDA:sn

cc: City of Burbank Public Works (Rodney Anderson, Bonnie Teaford)
City of Glendale Public Works (Steve Zurn)
County of Los Angeles Department of Public Works (Don Wolfe)

ROOM 869 KENNETH HAHN HALL OF ADMINISTRATION, 500 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 900
TELEPHONE (213) 974-5555 • FAX (213) 974-1010 • WEBSITE http://antonovich.co.la.ca.us/ • E-MAIL fifthdistrict@lacbos.o

Letter AJ7. Signatory – Board of Supervisors for the County of Los Angeles

Response to Comment AJ7-1

Comment noted. For a discussion of the GBIS alignment recommended for approval and certification, please refer to Section 1.5.2.2 of this Final EIR.

Certified Mail

1161

City of El Segundo

Kelly McDowell, Mayor

February 21, 2006

Mr. Jawahar P. Shah
City of Los Angeles
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, CA 90065

Subject: Hyperion Wastewater Treatment Plant (HTP) Draft EIR Peer Review

Dear Jawahar:

The following are comments from the City of El Segundo addressing the Draft Environmental Impact Report for the Integrated Resources Plan.

DEIR Comments

Comments to the HTP DEIR are summarized with the following topics: "Noise", "Air Quality", "Aesthetics", and "Hazards and Hazardous Materials".

Noise

1. On page 3.13-95 of the DEIR, Mitigation Measure NV-MM-6 should be modified to include the Hyperion Treatment Plant. Subsequent noise monitoring should be conducted post construction to ensure that a significant noise increase does not occur. Subsequent noise monitoring should also be conducted to ensure that the operational noise characteristics do not exceed the criteria specified in Title 7, Chapter 2 of the El Segundo Municipal Code.

AJ8-1

350 Main Street, El Segundo, California 90245-3813
Phone (310) 524-2302 FAX (310) 322-7137

Letter AJ8. Signatory – City of El Segundo

Response to Comment AJ8-1

As addressed in Section 3.13.3.2 and Section 3.13.3.3 of the Draft EIR, the noise analysis indicates that noise levels from the additional processing equipment that would be installed in Hyperion would incrementally increase noise levels by less than 1 decibel at nearby sensitive receptors since the proposed processing equipment would have low noise levels. The incremental increase of less than 1 decibel would not be perceptible by the general public. As such, additional acoustical analysis, as stated in mitigation measure NV-MM-6, would not be necessary for Hyperion. Subsequent noise monitoring would also not be required for Hyperion.

Jawahar P. Shah
City of L.A.
Feb. 21, 2006

Air Quality/Odor

AJ8-2

2. During the construction of the proposed Project, diesel fired equipment would be utilized. Diesel fired equipment is known to emit diesel particulate matter (DPM) and acrolein emissions, which are considered toxic air contaminants by the California Air Resources Board (CARB) and the Environmental Protection Agency (EPA). Construction emissions should also be modeled with ISCST3. DPM and acrolein impacts should be assessed against the Office of Environmental Health Hazard Assessment standards, which allows the exposure periods for the cancer calculation to be as short as nine years (i.e., a risk factor of 9/70).

AJ8-3

3. As stated in Section 3.4.3.3 of the DEIR, construction related air emissions would be significant and unavoidable. Thus, the following South Coast Air Quality Management District (SCAQMD) recommended mitigation measures should be implemented into the project:

   - Provide on-site lunch trucks/facilities during construction to reduce off-site worker vehicle trips.
   - Prohibit parking of construction vehicles on streets adjacent to residences, schools, daycare centers, convalescent homes and hospitals.
   - Prohibit construction vehicles idling in excess of five minutes to be consistent with State law.
   - Suspend use of all construction equipment during a first-stage smog alert.
   - Designate a person who will ensure implementation of the proposed mitigation measures through direct inspection and investigation of complaints. The project proponent should also provide a telephone number that residents may call should they have complaints regarding construction nuisance.
   - Use zero VOC content architectural coatings on buildings.
   - Restrict the number of gallons of coatings used per day.
   - Encourage water-based coatings or other low-emitting alternatives.
   - Paint contractors should use hand applications instead of spray guns.

- 2 -

Response to Comment AJ8-2

Because of the temporary and transient nature of construction emissions, the SCAQMD currently does not call for health risk assessments for construction activities in CEQA analyses. Rather, construction impacts are typically addressed by estimating criteria pollutant emissions and comparing the emissions to SCAQMD emission thresholds. Health risk assessments are normally conducted only for operational activities that could result in long-term exposure (a 70-year exposure duration is typically assumed) to constituents of concern. Nevertheless, the commenter correctly points out that diesel engine exhaust is classified by the State of California as a toxic air contaminant exhibiting both carcinogenic and noncarcinogenic health effects (including its speciated components). Therefore, the use of emulsified fuel and diesel particulate filters, if feasible, is prescribed as mitigation for diesel construction equipment to reduce exposure of diesel emissions to the public (AQ-MM-1 and AQ-MM-2). According to the California Air Resources Board, emulsified fuel alone reduces diesel particulate matter emissions by about 60 percent, and a diesel particulate filter alone reduces diesel particulate matter emissions by at least 85 percent. As a result, the combination of emulsified fuel plus a diesel particulate filter would reduce diesel particulate matter emissions by well over 85 percent. For an additional discussion of the ISCST3 model, refer to response to comment AJ8-6 below.

Response to Comment AJ8-3

Many of these recommendations have been added as mitigation measure AQ-MM-9 and included in Section 2 of this Final EIR.

4. To mitigate odor impacts from the demolition of the existing Hyperion facilities, the following is recommended:

AJ8-4

- Rinse the surfaces of the old equipment with chemicals such as sodium hypochlorite, hydrogen peroxide or other oxidants; or
- Use odor suppressing foams used to minimize the release of odors.

AJ8-5

5. Should project construction require excavating soils (or other soil movement) previously under sludge drying beds, the lead agency should include the influence of complying with SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil).

AJ8-6

6. Odor impacts for the Hyperion Plant were qualitatively assessed, as it is an existing odor generating facility. An odor control assessment should be prepared that quantitatively assesses hydrogen sulfide (H_2S) and Reduced Sulfur Compounds (RSC). The modeling and analysis should specifically address the Intensity, Butanol Equivalence, Character, and Hedonic Tone. Dispersion modeling should be performed with the Industrial Source Complex – Short Term Version 3 (ISCST3) model. Typical SCAQMD values should be utilized in the ISCST3 model, such as the urban dispersion coefficient and bypassing the calm wind speed processing.

   The model output one-hour average concentrations should be multiplied by a peaking factor to estimate the peak three-minute concentration. The odor threshold should be assessed utilizing the methodology set forth by American Society for Testing and Materials (ASTM) E679-91 (Standard Practice for the Determination of Odor and Taste Thresholds by a Force-Choice Ascending Concentration Series Method of Limits).

AJ8-7

7. As stated on page 3.4-135 of the DEIR, increased wastewater and biosolids throughput at Hyperion would temporarily increase fugitive odor emissions from other facilities (receptors) not directly involved in the identified expansion projects. In addition, the City of El Segundo is concerned with the potentially permanent increase in fugitive odor emissions from these other receptors. The following control measures should be investigated for potential implementation and included in the expansion project:

Response to Comment AJ8-4

These recommendations have been included in this Final EIR as odor mitigation measure AQ-MM-10 and included in Section 2 of this Final EIR.

Response to Comment AJ8-5

As noted by the commenter, excavation of VOC-contaminated soil would be regulated by SCAQMD Rule 1166. See response to comment AJ1-28 for a description of the general requirements of this rule.

Response to Comment AJ8-6

A part of the permitting process for the Primary Centralized Scrubbers, the SCAQMD initially used the ISCST3 dispersion model to help determine stack concentration limits to maintain a specified fenceline limit. Subsequent health risk assessments determined that the ISCST3 model was overly conservative in estimating H_2S concentrations at the fenceline. Monitoring of H_2S at the fenceline has confirmed this. Because of this, the use of ISCST3 is not considered an appropriate model for modeling odors at Hyperion.

Response to Comment AJ8-7

The City has completed the Centralized Primary Scrubber Improvements Phase I. In addition, scrubber capacity will be increased by 60-80 kscfm to 120 kscfm in September 2006. These projects have already been programmed and are, therefore, not included in the EIR as mitigation.

Regarding the commenter's request for continuous monitoring, the SCAQMD requires a monitoring program with once-a-day sampling, and no additional sampling has been required.

Regarding odor control, the City does not use limitations on odors based on allowable exceedances of odor levels at a particular dilutions-to-threshold concentration for hydrogen sulfide, in part, because odor detection levels and odor nuisance level vary widely from person to person. All odor control equipment at Hyperion must obtain permits

from the SCAQMD before they can operate. As part of the permitting process, compliance with various SCAQMD Rules and Regulations will have to be demonstrated, and these include:

Rule 201 – Permit to Construct

Rule 203 – Permit to Operate

Rule 212 – Standards for Approving Permits

Rule 301 – Fees

Rule 402 – Nuisance

Rule 407 – Liquid and Gaseous Air Contaminants

Reg IX Subpart O – Standards of Performance for Sewage Treatment Plants

Rule 1179 – Publicly Owned Treatment Works Operations

Reg XIII – New Source Review

Reg XIV – Toxics and Other Non-Criteria Pollutants

Rule 1901 – General Conformity

Reg XXX – Title V Permits

Rule 402 and Reg XIV would control hydrogen sulfide levels from the odor control equipment. For existing odor scrubbers at Hyperion, SCAQMD has established concentration limits at the exhaust stacks for hydrogen sulfide to control odors at the fenceline and at outside receptors. For odor control equipment at Hyperion, the City will continue to comply with all conditions and stack limits controlling hydrogen sulfide emissions, as well as other constituents.

Regarding new facilities having to meet or exceed the odor control capacities already outlined in the November 2002 Odor Mitigation Plan, odor control systems at Hyperion are expected to meet or exceed the odor control capacities outlined in the November 2002 Odor Mitigation Plan.

The secondary clarifiers have skimming devices that collect flotsam from the effluent surface. Because of the skimming devices, the use of covers on the water surface would interfere with the skimming process.

- Primary clarifier scrubber – Should be upgraded with appropriately sized pumping, ducting and chemical feed equipment to operate in dual chemistry mode (i.e., both sodium hypochlorite and sodium hydroxide). The efficiency of the controls should achieve 99 percent control.
- Continuous monitoring equipment should be installed to monitor the H_2S exhaust concentrations with potential feedback loop control of the chemical metering pumps.
- Odor control should be limited to less than 50 exceedances of an odor level of 7 dilutions-to-threshold (D/T) at off-site receptor locations.
- The odor control systems of proposed Plant upgrades and existing receptors should ultimately meet or exceed the odor control capacities outlined in the November 2002 Odor Mitigation Plan.
- Secondary clarifiers – Should be covered (i.e. with flat aluminum or fiberglass reinforced plastic). Odor control shall include an appropriate range of air exchanges per hour.

AJ8-7

Aesthetics

8. HTP's Odor Mitigation Plan (November, 2002) states that current (2002) flows through the Plant are 360 MGD. The DEIR states Year 2000 flows were 443 MGD, which is not consistent. The DEIR assertion that Year 2020 flows will be 511 MGD suggests an increase by 68 MGD. Based on the OMP, Year 2020 flows would be 428 MGD, which would appear to be 'comfortably' within the current capacity of the Plant (450 MGD). Why is expansion necessary? The City of El Segundo requests a detailed explanation of the 'no-project' alternative be included in the DEIR.

AJ8-8

9. The City of El Segundo requests that the City of Los Angeles include a mitigation monitoring program, based on the cooperative efforts of both the City of El Segundo and Hyperion Treatment Plant staff, to take place during and following Plant expansion in a manner similar to the program under the MMIP.

AJ8-9

10. The DEIR should outline specific truck routes during and following Plant expansion.

AJ8-10

Response to Comment AJ8-8

The Draft EIR states that the flows within the Hyperion Service Area (HSA) were 443 mgd. The HSA includes flows to Tillman, LAG, and Hyperion. Flows to Hyperion were included in Table 1-2 of the Draft EIR, and show an average monthly flow of approximately 340 mgd to Hyperion. The IRP Facilities Plan identified a potential need to add treatment capacity to the HSA by the year 2020 based on wastewater flow projections (which are also based on future population projected by SCAG). Actual treatment capacity expansion would not occur until indicated by regulatory, wastewater flow, or other triggers.

The IRP is a Facilities Plan for the wastewater system and integrates future recycled water and runoff needs. The No Project Alternative would not involve an integrated approach to facilities planning, and would not propose any facility improvements at this time. Rather, facilities would be upgraded, improved, or expanded when circumstances require, and such improvements would be subject to separate environmental documentation. The No Project Alternative is the last alternative discussed at the conclusion of every resource analysis in Section 3 of the Draft EIR.

Response to Comment AJ8-9

A mitigation monitoring program effectively has been in place for more than 12 years, which represents the collaborative effort of the City of El Segundo and Hyperion related to plant expansion and operation. Continuing this good neighbor policy, applicable mitigation measures in this Final EIR will be incorporated into the existing monitoring program.

Response to Comment AJ8-10

As stated on page 3.17-2 of the Draft EIR, arterial roadways in the vicinity, including Imperial Highway and Vista del Mar, would be expected to carry Project-related traffic. This is consistent with the City's policy to allow truck traffic on major and secondary arterials. These routes provide direct access to the regional freeway system via I-405 and I-105. As stated in TRA-MM-1 on page 3.17-79 of the Draft EIR, specific haul routes will be determined during the preparation

AJ8-11 11. The DEIR should outline specific reasons why the proposed upgrades to HTP solids handling capacity under the Project are disproportionately high compared to the overall proposed Plant expansion.

AJ8-12 12. The new digestors will be located closer to the ocean, at a maximum height of 110 feet above mean sea level. If this is the same as the existing egg-shaped digestors, then visual impacts will be increased, due to geometry. Massing and impacts to the view corridor should be analyzed within the EIR.

AJ8-13 13. Recently, electrical conduit has been added to the existing digesters without prior notification to residents. This issue was recently addressed at the Citizens Forum under the existing MOU. This new conduit has had an adverse visual impact on ocean views from neighboring housing, and HTP staff has acknowledged that some of the visual impact might have been avoided if addressed prior to installation. This issue should be analyzed within the EIR.

AJ8-14 14. The addition of three secondary clarifier modules (12 tanks) for the Hyperion plant do not include increased odor control. The secondary clarifier expansion should include addition of new odor scrubbing systems or upgrade of existing odor scrubbing systems complete with increased scrubbing (pumping) capacity and upsize of main ducting, where necessary.

AJ8-15 15. The EIR should address the relocation of 248 parking spaces for existing staff and contractors. If expansion of the existing parking structure includes construction of additional levels, this will likely produce additional visual impact that should be analyzed within the EIR.

AJ8-16 16. On page 2-10 of the DEIR, the height of the new truck-loading facility needs to be revised to be consistent with Figure 2-3, which identifies a maximum height above mean sea level of 110 feet. If this is the same as the existing egg-shaped digestors, then visual impacts will be increased, due to geometry. Massing and impacts to the view corridor should be analyzed within the EIR.

AJ8-17 17. The addition of 12 egg-shaped digestors for the Hyperion plant do not include increased odor control. This expansion should

of a site-specific traffic control plan prior to the start of any construction work.

Response to Comment AJ8-11

It is assumed that this comment refers to the number of new digesters proposed for Hyperion (compared to the number of existing digesters) relative to the amount of secondary capacity proposed for Hyperion (compared to the existing secondary clarifier capacity). The existing solids handling capability at Hyperion uses 20 existing egg-shaped digesters to reduce further the volume of the solids and to meet the requirements for the land application of biosolids. Hyperion's digesters have a capacity of approximately 680 wet tons per day, and process about 650 wet tons per day. The new digesters (up to 12) proposed under the IRP would accommodate increasing biosolids quality requirements (time and temperature retention requirements) needed for continued land application and would provide redundancy in the solids handling system to allow some digesters to be routinely taken off-line for maintenance, inspection, repairs, and operational improvements. The proposed digesters would be implemented as needed based on demand and/or regulatory triggers, and represents a conservative assessment scenario through the year 2020. It is noted that the number of new digesters constructed at Hyperion could be fewer than the 12 proposed under all the Project Alternatives.

Response to Comment AJ8-12

As discussed in detail in Section 3.2.4.1, and shown in Figure 3.2-18 and Figure 3.2-19, of the Draft EIR, views of the proposed digesters would vary along the bluff. Residents of the City of El Segundo located closer to Imperial Highway would not be able to view the new digesters because the digesters would be effectively screened below the existing 120 foot (above mean sea level) landscape mitigation planting (Figure 3.2-18 of the Draft EIR). Those residents further south along the bluff, closer to Scattergood Generating Station, would not see the proposed digesters because they would be below the existing vegetation and bluff/dune (Figure 3.2-19 of the Draft EIR).

Response to Comment AJ8-13

The recent work performed on the existing digesters at Hyperion was part of minor alteration of existing facilities and necessary to bring the digesters up to current code standards. This ongoing operation and maintenance activity associated with existing facilities is not part of the IRP project. As addressed in the Draft EIR, the City is committed to limiting the height of the proposed digesters to be no greater than the existing digesters, and the new elevators would be limited to 110 feet above mean sea level.

Response to Comment AJ8-14

Existing secondary clarifiers have, and proposed secondary clarifiers would have skimming devices to collect flotsam from the effluent surface. Because of the skimming devices, the use of covers on the water surface would interfere with the skimming process. The addition of a scrubber system for the secondary clarifiers would not be an option without the ability to cover the secondary clarifiers. It is important to note that prior to the Hyperion Full Secondary project, the secondary reactors had substantially greater VOC emissions than the secondary clarifiers, which were not considered to be substantial odor generators. The secondary reactors have been covered.

Response to Comment AJ8-15

As detailed in Section 3.17.3.2 of the Draft EIR, although the existing parking supply would be reduced by approximately 22 percent, the parking study performed at Hyperion concluded that the existing parking supply would be sufficient even with the permanent loss of parking from clarifier expansion. The existing parking on-site supply would be reallocated to accommodate the various users of the facility; therefore, no expansion of the parking structure is proposed.

Response to Comment AJ8-16

The text of the Draft EIR has been revised to clarify that the truck-loading facility (page 2-10 of the Draft EIR) would be up to 110 feet above mean sea level, which is consistent with Figure 2-3. Refer to Section 2 of this Final EIR for the modification.

Response to Comment AJ8-17

Comment noted. Refer to response to comment AJ8-7.

include addition of new odor scrubbing systems or upgrade of existing odor scrubbing systems complete with increased scrubbing (pumping) capacity and upsize of main ducting, where necessary. AJ8-17

18. Mitigation Measure AES-MM-7 should be modified to require a lighting control plan for construction and plant operations. Lighting shall be installed with the lowest illumination feasible, using soft yellow/orange/pink lighting elements, low-pressure sodium elements. Baffles, shades, and hoods should be used to direct all lighting downward, so that light does not escape in an upward direction, and is not reflected onto any off-site residences. All light standards and fixtures within parking lots shall be of a cutoff or motion sensor/timed design. AJ8-18

Prior to final inspection, a photometric field inspection of the approved lighting system should be conducted. The inspection should verify the proper construction and installation of materials within the approved plan, determine the actual light patterns and values through light meter testing and observation, and determine the extent of any errant lighting. Deviations and/or violations should be corrected prior to the final clearance for the project. AJ8-19

19. Prior to site mobilization at Hyperion, lighting for construction should be used in a manner that minimizes potential night lighting impacts, as follows: AJ8-20

- All lighting shall be of minimum necessary brightness consistent with worker safety.
- All fixed position lighting shall be shielded, hooded, and directed downward to minimize backscatter to the night sky and prevent light trespass (direct lighting extending outside the boundaries of the construction area).
- Wherever feasible and safe, lighting shall be kept off when not in use and motion detectors shall be employed.
- A lighting complaint resolution form should be maintained by construction management, to record all lighting complaints received, and to document the resolution of that complaint.
- All construction-related lighting shall be completely shielded or screened so as not to be visible to residents northeast of the project site.

Response to Comment AJ8-18

Mitigation measure AES-MM-7 is not specific to Hyperion. AES-MM-7 addresses measures that would reduce the potential for construction lighting impacts associated with any IRP component in residential areas. As described under 3.2.4.1 (on page 3.2-110) of the Draft EIR, nighttime lighting for the new features at Hyperion would be similar to lighting associated with the existing features, and will be designed to minimize light and glare impacts to residents located to the east of the plant. As a further commitment to minimizing light and glare impacts to adjacent residents, this Final EIR includes an additional mitigation measure, AES-MM-11, which addresses the preparation and implementation of a lighting control plan specific to Hyperion, in coordination with the City of El Segundo.

Response to Comment AJ8-19

As addressed in Section 3.2.4.1 of the Draft EIR, the additional lighting features associated with proposed improvements at Hyperion would not introduce new features that contrast with the existing plant components. Also, the addition of mitigation measure AES-MM-11 would make a photometric field inspection unnecessary.

Response to Comment AJ8-20

The lightening control plan developed and implemented under new mitigation measure AES-MM-11 will include measures, such as those suggested in the comment, to further minimize potential lighting impacts from construction and operation of the proposed IRP components at Hyperion.

AJ8-21

20. During construction, removal of vegetation and grading should be minimized to reduce visible disturbance. Following completion of natural landform and revegetated to reduce visual contrast. Appropriate screening (e.g. temporary opaque fencing, six feet in height) should be used to buffer views of construction equipment and material, when feasible. Staging locations should be indicated on final plans, and grading plans should be submitted to the City of El Segundo Planning Department for review and comment. To the extent feasible construction activities and associated storage, staging, and stockpiling areas should be concentrated away from adjacent residential areas.

AJ8-22

21. Buildings should be constructed with non-reflective surfaces, including roofs and windows.

AJ8-23

22. The City of Los Angeles should meet the City of El Segundo's requirements for Vehicle Use Area (VUA) landscaping by providing the required number of trees in areas that will be striped for vehicle parking.

AJ8-24

23. Although the Cities of Los Angeles and El Segundo have negotiated a Hyperion Landscape Agreement Memorandum of Understanding (MOU) as visual mitigation for the previously constructed egg-digesters, additional landscape opportunities should be provided. The City of Los Angeles should establish a Landscape Committee to develop the final landscape plan that will be submitted to the City of El Segundo for review and approval. The Landscape Committee should be comprised of two voting members from the City of El Segundo and two members (one vote) representing the project owner.

AJ8-25

Trees and landscaping should be designed to balance view corridors to the ocean with screening of the facility for the northernmost residents of the City of El Segundo along the bluff. The screening should, at a minimum, utilize landscape opportunities on all four boundaries of the project site. Landscape screening should include continuous tree canopies. The plan should comply with City of El Segundo Zoning codes (Title 15, Chapter 2, Sec. 15-2-14) pertaining to on-site landscaping.

AJ8-26

The landscape screening and the irrigation system should be monitored for a period of five years to ensure survival. During this period all dead plant material should be replaced. To

Response to Comment AJ8-21

It is anticipated that all construction, and construction-related staging, associated with the IRP components at Hyperion would occur within the plant boundary and not involve landscaped areas visible to adjacent residential areas.

Response to Comment AJ8-22

As described in Section 3.2.4.1 of the Draft EIR, the proposed new features at Hyperion would be similar to those already at the plant. In addition, the existing Construction Master Specifications associated with Hyperion includes requirements for non-reflective surfaces. As detailed in Section 3.2.4.4 of the Draft EIR, no significant glare impacts are anticipated.

Response to Comment AJ8-23

There are no proposed improvements at Hyperion that would be within the City of El Segundo; therefore, the VUA requirements would not be applicable.

Response to Comment AJ8-24

As addressed in response to comment AJ8-12, the analysis in Section 3.2.4.1 of the Draft EIR (including modifications as detailed in Section 2 of this Final EIR) determined that 120-foot (above mean sea level) landscape mitigation planting would be effective in screening the new digesters from the view of residents of the City of El Segundo at the northern most end of Hyperion. Those residents further south along the bluff, closer to Scattergood Generating Station, would not see the proposed digesters because they would be below the existing vegetation and bluff/dune.

Response to Comment AJ8-25

As agreed upon in the Hyperion Landscape Agreement Memorandum of Understanding (MOU) negotiated previously between the City of

AJ8-26

achieve year-round screening, evergreen species shall be used. Spacing of trees should be sufficiently dense to ensure substantial screening by the tree canopy at maturity.

AJ8-27

To satisfy the aforementioned conditions, a detailed landscape, grading, and irrigation plan should be submitted to the City of El Segundo for review and comment. The plan should include a list of proposed tree, plant, and shrub species and installation sizes, and a discussion of both the suitability of the plants for the site conditions and mitigation objectives. A list of potential plant species that would be both viable and non-invasive in this location should be prepared by a qualified professional landscape architect familiar with local growing conditions, with the objective of providing the widest possible range of species from which to choose. The final planting plan shall include an all-inclusive list of plants to be used in order to ensure exclusion of potentially invasive species. Soil tests should be performed on both on-site and imported soil where landscaping is to take place. Soil shall be amended on the basis of those tests, if needed to ensure long-term viability of plantings.

If you have any questions you may call Seimone Jurjis, Director of Planning and Building Safety at (310) 524-2345.

Sincerely,

Kelly McDowell
Mayor

cc: All City Council
Jeff Stewart, City Manager
Mark Hensley, City Attorney
Seimone Jurjis, Director PBS
James O'Neil, RSI Program Manager
File

P:\Planning & Building Safety\Sjurjis\Staff Reports Part 2\Hyperion IRP DEIR\Letter (K.McD) to LA regarding comments to DEIR IRP-FINAL-2-21-06.doc

Los Angeles and the City of El Segundo, the vegetation under this landscape plan, once established, would be limited to the height of 120 feet above mean sea level. The MOU and landscape plan focused on the visual impacts for the previously constructed egg-digesters at the northernmost portion of the plant. As addressed in detail in Section 3.2.4.1 of the Draft EIR, the new digesters would be no taller than the existing digesters and be screened by the existing 120-foot (above mean sea level) mitigation planting. Therefore, no additional landscaping would be required.

Response to Comment AJ8-26

Refer to response to comment AJ8-25.

Response to Comment AJ8-27

Refer to response to comment AJ8-25.

1155

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

JAMES F. STAHL
Chief Engineer and General Manager

February 22, 2006

Mr. Jawahar P. Shah
City of Los Angeles
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, CA 90065

Dear Mr. Shah:

Notice of Availability--Integrated Resources Plan (IRP)
Draft Environmental Impact Report (DEIR)

AJ10-1 Thank you for the opportunity to comment on the IRP DEIR. The County Sanitation Districts of Los Angeles County (Districts) have reviewed this document for potential impact on Districts' facilities. The project will not impact facilities under the jurisdiction of the Districts.

The Districts appreciate being included in the review of the IRP DEIR. If we may be of further assistance, please contact the undersigned at (562) 699-7411, extension 2711.

Very truly yours,

James F. Stahl

Steven W. Highter
Supervising Engineer
Planning Section

SWH:MJJ:ee

DOC#615633
Recycled Paper

Letter AJ10. Signatory – County Sanitation Districts of Los Angeles County

Response to Comment AJ10-1

Your comment is noted and is included in this Final EIR for consideration of decisionmakers.

1105

City of Los Angeles Department of Recreation and Parks

Studio City Recreation Center

12621 Rye Street Studio City, CA 91604
(818)769-4415

February 23, 2006

Jawahar P. Shah
City of Los Angeles Department of Public Works
Bureau of Sanitation, Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, CA. 90065

AJ11-1 This is to inform you that the Studio City, California Park Advisory Board which represents the thousands of families and community members who use our Studio City parks strongly opposes the possible selection of Woodbridge Park by the Department of Public Works as the location of the tunneling shafts as part of the NorthEast Interceptor Sewer (phase 2). In addition, we strongly endorse the use of the Caltrans Maintenance Station located on Moorpark Avenue near the 170 freeway as the only feasible location.

In support of this, the SC PAB passed the following motion on December 1, 2005

Motion to protect and save Woodbridge Park: Made by Stein, seconded by Knight

In order to protect the limited amount of parks and open spaces, and recreational activities within our community, to keep our children's playgrounds open, to shield the students of Oakwood Elementary School, save the approximately $200,000 of public funds recently spent in renovating the Woodbridge Park, to preserve the quality of life in our Tujunga Village neighborhood, and avoid the numerous detrimental neighborhood impacts, It is the position of the Studio City Park Advisory Board:

AJ11-2 a) That it **strongly opposes** the possible selection of Woodbridge Park by the Department of Public Works as the location of the tunneling shafts as part of the NorthEast Interceptor Sewer (phase 2),

b) That the only feasible location under consideration is the Caltrans Maintenance Station located on Moorpark Avenue near the 170 freeway, and

c) That Councilmember Wendy Greuel join us in **strongly opposing** the possible choice of Woodbridge Park as the site for this project, and insisting that the Caltrans Maintenance Station at Moorpark Avenue and the 170 Freeway is the only feasible location.

Motion passes: 6-0

Letter AJ11. Signatory – Studio City Recreation Center

Response to Comment AJ11-1

As described in Section 1 of the Draft EIR, City of Los Angeles staff has identified the preferred Project Alternative (including preferred GBIS alignment and shaft sites) following the circulation of the Draft EIR and prior to certification of this Final EIR. Section 1.5.2.2 of this Final EIR describes the staff recommended GBIS Alignment. Comment noted.

Response to Comment AJ11-2

The potential impacts associated with the construction (i.e., shaft sites) and operation (i.e., ATFs) of the sewer on adjacent land uses are described in detail in Section 3 of the Draft EIR, and, where appropriate, includes project features and mitigation measures to minimize impacts. Specifically, the potential impact of the proposed GBIS project component on school and recreational facilities is addressed in detail in Section 3.15 and 3.16, respectively. As described in Section 3.16.2.3 of the Draft EIR, the proposed shaft site and ATF at Woodbridge Park would result in a significant impact to recreation and permanent reduction of the recreational use of the park. Mitigation measures have been proposed to reduce the impacts if these components are constructed, such as coordination with City of Los Angeles Recreation and Parks to locate the shaft site/ATF to an area that would minimize impacts (REC-MM-2 and REC-MM-3) and coordination with school officials to protect the students and providing access to the adjacent Oakwood School (PS MM-2). Even with mitigation, the Draft EIR analysis determined that an unavoidable significant adverse impact would remain for Woodbridge Park. The City of Los Angeles staff considered the findings of the Draft EIR when identifying the Recommended Alternative (including the staff recommended GBIS Alignment and shaft sites) and the decisionmakers will also consider the findings of the Draft EIR when approving and certifying the project. If after considering this Final EIR, the decisionmakers find that the benefits of the project outweigh the unavoidable adverse environmental effects, a Findings and

The minutes of the meeting are attached for your record.

Sincerely,

Mark Batterman
Studio City Park Advisory Board President
Studio City Neighborhood Council Board Member

Statement of Overriding Considerations will be required. It is important to note, however, that the staff recommended GBIS Alignment would terminate at the Caltrans Maintenance Yard Shaft Site rather than at Woodbridge Park (refer to Section 1.5.2.2 of this Final EIR). As recommended, Woodbridge Park would not be used for a construction shaft site or for the placement of an air treatment facility.