

CHAPTER 11

Response to Comments

11.1 CEQA Requirements

Before LACWWD40 and the Responsible Agencies may approve the proposed project, LACWWD40 as the Lead Agency must certify that the Final PEIR: a) has been completed in compliance with CEQA; b) has been presented to the County of Los Angeles Board of Directors who reviewed and considered it prior to approving the project; and c) reflects LACWWD40's independent judgment and analysis.

CEQA Guidelines specify that the Final PEIR shall consist of the following:

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

This Final PEIR for the North Los Angeles/Kern County Regional Recycled Water Project presents:

- the revised Draft PEIR (Chapters 1 through 9);
- A list of persons, organizations, and public agencies commenting on the Draft PEIR along with the written comment letters received (Chapter 10);
- A response to each comment received on the Draft PEIR including any revisions made to the text of the Draft PEIR in response to such comment (Chapter 11); and
- A compilation of additional revisions made to the text of the Draft PEIR by the Lead Agency (Chapter 12).

11.2 Comments on the Draft EIR and Responses to Comments

The Draft PEIR was circulated for public review from August 5, 2008 through October 3, 2008. During this period, a public workshop and public hearing were held to provide interested persons with an opportunity to comment orally or in writing on the Draft PEIR and the project. The public

workshop and public hearing were held at the Lancaster City Hall Council Chambers on September 11, 2008 and September 18, 2008, respectively. No comments were offered from the audience during the public hearing, other than a request for a time extension to the comment period by the Leona Valley Town Council.

Table 10-1 lists the agencies that submitted written comments on the Draft PEIR during the public review period. Comment letters are included in Chapter 10. Responses are included here in Chapter 11. The responses to comments are numbered to correspond to the comment numbers that appear in the margins of the comment letters.

11.3 Corrections and Additions to the Draft EIR

Revisions to the Draft PEIR were developed in response to comments received during the public review period. The revisions appear as indented text in the responses. This Final PEIR is a reprinted version of the Draft EIR that includes the revisions. Where the responses indicate additions or deletions to the text of the PEIR, additions are indicated in underline, deletions in ~~strikeouts~~.

11.4 Responses to Comments

Federal Aviation Administration (FAA), August 13, 2008

Comment FAA-1

The comment states that it is necessary under Part 77 of the Federal Aviation Regulations to notify the FAA of any proposal which would exceed certain elevations with respect to the ground and neighboring airports. To fulfill this requirement, the implementing agencies would need to complete project review through the FAA's 7460 airspace review process.

Response FAA-1

Mitigation Measure 3.8-1c on page 3.8-25 of the PEIR states that the implementing agencies shall submit their design plans for airspace analysis pursuant to FAA Part 7460 to determine whether any of the proposed project components or proposed construction equipment would protrude into protected airspace.

Comment FAA-2

The comment states that if the project includes building an open reservoir within the vicinity of an airport, then the implementing agencies should review FAA Advisory Circular 150/5200-33, Hazardous Wildlife Attractants on or Near Airports.

Response FAA-2

The proposed project would not include building of an open reservoir within the vicinity of an airport. In addition, Mitigation Measure 3.8-1d on page 3.8-25 of the PEIR identifies that the

implementing agencies should ensure that neither project design nor construction plans create temporary or permanent sources of open water or other wildlife attractants within the Airport Influence Areas.

State Water Resources Control Board, August 27, 2008

Comment SWRCB-1

The comment outlines the process required to apply for State Revolving Fund (SRF) loans. The comment states that prior to obtaining SRF funding, projects are subject to provisions of the Section 7 of the federal Endangered Species Act, Section 106 of the National Historic Preservation Act (NHPA), the federal Clean Air Act, the Coastal Zone Management Act, the Flood Plain Management Act, the Migratory Bird Treaty Act, and the Wild and Scenic Rivers Act.

Response SWRCB-1

The PEIR discusses each of these regulations and evaluates their applicability to each project component. The PEIR evaluates potential impacts of the proposed project to resources managed by these regulations. The PEIR proposes mitigation measures where necessary to ensure compliance with these regulations. If SRF funding is pursued, the implementing agencies will comply with loan application requirements as requested and describe how each project complies with each regulation.

Comment SWRCB-2

The comment requests that Mitigation Measure 3.1-1 on page 3.1-6 be modified to require that the replanted areas be monitored to ensure that plants are reestablished in the disturbed areas.

Response SWRCB-2

The following text has been added to Mitigation Measure 3.1-1 on page 3.1-6 of the Final PEIR.

Mitigation Measure 3.1-1: Following construction activities, the implementing agencies shall restore disturbed areas by reestablishing pre-existing conditions including topography, repaving roadways, replanting trees, and/or reseeding with a native seed mix typical of the immediate surrounding area. The implementing agencies shall be responsible for monitoring the replanted areas to ensure that revegetation is successful.

Comment SWRCB-3

The comment states that compliance with the law should not be considered to be a mitigation measure. Mitigation Measure 3.6-2b on page 3.6-9 would require the construction contractor follow the provisions of the California Code of Regulations Title 8, Section 5163 through 5167 for General Industry Safety.

Response SWRCB-3

In response to this comment, Mitigation Measure 3.6-2b has been revised as follows:

Mitigation Measure 3.6-2b: ~~The implementing agencies shall require the construction contractor(s) to follow the provisions of California Code of Regulations Title 8, Sections 5163 through 5167 for General Industry Safety Orders to protect the project area from being contaminated by the accidental release of any hazardous materials and/or wastes. to~~ implement safety measures in accordance with General Industry Safety Orders for Spill and Overflow Control (CCR Title 8, Sections 5163-5167) to protect the project area from contamination due to accidental release of hazardous materials. The safety measures shall include, but not be limited to, the following:

- Spills and overflows of hazardous materials shall be neutralized and disposed of promptly.
- Hazardous materials shall be stored in containers that are chemically inert to and appropriate for the type and quantity of the hazardous substance.
- Containers shall not be stored where they are exposed to heat sufficient enough to rupture the containers or cause leakage.
- Specific information shall be provided regarding safe procedures and other precautions before cleaning or subsequent use or disposal of hazardous materials containers.

Disposal of all hazardous materials shall be in compliance with applicable California hazardous waste disposal laws. The construction contractor shall contact the local fire agency and the County Department of Public Health, Environmental Health Division, for any site-specific requirements regarding hazardous materials or hazardous waste containment or handling.

Department of Water Resources (DWR), State Water Project Encroachment Permit Section, October 3, 2008

Comment DWR-1

The comment states that the proposed pipelines would cross the California Aqueduct at 40th Street East and Elizabeth Lake Road and would therefore require an encroachment permit from DWR.

Response DWR-1

The PEIR on page 2-22 states that the implementing agencies would use the analysis contained within the PEIR to support the acquisition of a roadway encroachment permit/easement from DWR.

Comment DWR-2

The comment requests that DWR be provided with any subsequent environmental documentation when it becomes available for public review.

Response DWR-2

The requested documents will be provided to DWR once available. No response required.

Department of Fish and Game, October 10, 2008

Comment CDFG-1

The comment recommends that construction of the pipeline be subject to further project level CEQA review as special status botanical and wildlife species may become apparent based on specific focused surveys conducted at the specific trenching sites.

Response CDFG-1

Construction of the pipeline would occur primarily within roadway right-of-ways that do not support native vegetation or special-status species. Although the exact location and extent of the construction easement has not been identified, the PEIR includes mitigation measures that require the implementing agencies to conduct pre-construction surveys for special-status species and habitats (Mitigation Measure 3.3-3a). In the event that special-status plant species would be affected by construction, the PEIR requires avoidance of such species, if possible (Mitigation Measure 3.3-3b). If avoidance is not possible, the PEIR requires the implementing agencies to minimize the construction zone through areas with special-status species and to consult with CDFG to determine appropriate mitigation for areas where direct impacts to plants cannot be avoided (Mitigation Measure 3.3-3b, as amended per response to comment CDFG-8 below). The PEIR requires the implementing agency to restore all disturbed areas to pre-construction conditions and to develop a restoration plan (Mitigation Measure 3.3-3d). These mitigation measures are adequate to ensure impacts to special-status species and habitats due to construction of the proposed pipeline would be less than significant. The implementing agencies would not be required to prepared additional CEQA documentation for implementation of the pipeline once this PEIR is certified and adopted. See response to comment CDFG-8 for revisions to the above-mentioned mitigation measures.

Comment CDFG-2

The comment recommends that US Fish and Wildlife Service protocol surveys be conducted to determine the presence or absence of the Desert Tortoise and that restrictive fencing be used to exclude tortoise from project construction areas.

Response CDFG-2

Restrictive fencing to protect special-status ground-dwelling wildlife species from construction areas is addressed in Mitigation Measure 3.3-1d. The following text change has been made to Mitigation Measure 3.3-1a on page 3.3-14 to include protocol surveys for special-status species, such as Desert Tortoise, if deemed necessary after pre-construction reconnaissance surveys.

Mitigation Measure 3.3-1a: The implementing agencies shall have a qualified biologist conduct a pre-construction field reconnaissance survey for special-status ground-dwelling species within the construction right-of-way. If potential for special-status ground-dwelling species is identified then presence/absence protocol surveys shall be conducted. If protocol surveys identify the presence of special-status ground-dwelling species, the implementing agencies shall consult with CDFG to determine further required mitigation.

Comment CDFG-3

The comment recommends that efforts be made to discourage attracting ravens to the project sites as they are a serious threat to Desert Tortoise survival.

Response CDFG-3

If desert tortoises are found to be present at the proposed project locations, consultation with CDFG would be required as stated in the revised Mitigation Measure 3.3-1a above, in which case CDFG can then require measures to assist in deterring ravens from the project site.

Comment CDFG-4

The comment agrees that an incidental take permit would be required if Mohave ground squirrel are detected or assumed present at the project site. The comment recommends that the trapping methods follow CDFG's trapping protocol which can be provided by the Department upon request.

Response CDFG-4

The following text change has been made to Mitigation Measure 3.3-1e on page 3.3-14.

Mitigation Measure 3.3-1e: Prior to project implementation, a habitat assessment ~~will~~ shall be conducted by a qualified biologist to determine the potential for the Mohave ground squirrel to occur within construction zones. If the habitat assessment determines that potential habitat for the Mohave ground squirrel is present in the impact zone or within 300 feet of the construction zone, then the implementing agencies have two options: 1) assume the Mohave ground squirrel is present and either take the steps necessary to avoid any potential direct or indirect impacts (i.e., construction noise and dust) that may be incurred by the Mohave ground squirrel or 2) arrange for a qualified biologist with the necessary permits to implement a trapping program in accordance with CDFG's trapping protocol to determine the presence or absence of the Mohave ground squirrel. If Mohave ground squirrel is identified as present or assumed present, implementing agencies shall obtain an incidental take permit from CDFG pursuant to Section 2081 of the California Fish and Game Code and provide compensation at a ratio determined by CDFG.

Comment CDFG-5

The comment recommends that focused nesting surveys be preformed for loggerhead shrike within appropriate habitat.

Response CDFG-5

The PEIR identifies the presence of loggerhead shrike in the project area in Table 2 of Biological Technical Report provided in Appendix E of the PEIR. Mitigation Measures 3.3-2a through 3.3-2c, 3.3-2e, and 3.3-2f require nesting bird surveys to be conducted prior to construction and in coordination with USFWS and CDFG and would cover the loggerhead shrike. Identified nesting sites would be avoided, and construction would occur out of the nesting season if possible, or buffer zones would be established as determined by CDFG and replacement habitat would not be necessary.

Comment CDFG-6

The comment recommends conducting burrowing owl presence or absence surveys in accordance with the Department's *1995 Staff Report on Burrowing Owl Mitigation* and the Burrowing Owl Consortium's *1992 Burrowing Owl Protocol and Mitigation Guidelines* including passive relocation guidelines. The guidelines described in the Draft PEIR may miss wintering burrowing owls which could be killed in their burrows during grading and trenching operations if done in the winter.

Response CDFG-6

The following text and Mitigation Measure have been added on page 3.3-14 and 3.3-15:

The Mohave ground squirrel and burrowing owl have the ~~has~~ potential to occur in the native habitats of the proposed project area. Any impacts to these ~~on this~~ species would be considered significant and mitigation would be required. Implementation of Mitigation Measure 3.3-1e and 3.3-1f would reduce these impacts to less than significant.

Mitigation Measure 3.3-1f: Prior to project implementation, a burrowing owl presence/absence survey shall be conducted by a qualified biologist in accordance with CDFG's 1995 Staff Report on Burrowing Owl Mitigation and the Burrowing Owl Consortium's 1992 Burrowing Owl Protocol and Mitigation Guidelines to determine the potential for the burrowing owl to occur within impacted areas and construction zones. If the survey results in discovery of burrowing owl, sign, or potential burrow sites in the impact zone, then additional surveys shall be performed during the breeding season (April 15 to July 15) in accordance with the 1992 Guidelines to determine use of the site by burrowing owl. Following this survey, the implementing agencies shall consult with CDFG to determine avoidance or mitigation measure to minimize project impacts to burrowing owl.

Comment CDFG-7

The comment agrees with the mitigation measures for native bird species in the Draft PEIR. Comment A further recommends that the project implement CDFG's native bird avoidance measures (Comment B through E).

Response CDFG-7

Comment B: The PEIR acknowledges the protection of native birds under the Migratory Bird Treaty Act (pages 3.3-10 and 3.3-15). Mitigation Measures 3.3-2b requires avoidance of direct impacts to any nesting birds and proposes construction outside of the breeding season (February 1 through August 31).

Comment C: If avoidance of the breeding season is not possible, all nests will be avoided by the reduction of the construction right of way (Mitigation Measure 3.3-2e) and creation of buffer zones in coordination with CDFG (Mitigation Measure 3.3-2c).

Comment D and E: Results of recommended protective mitigation measures and documented compliance will be accomplished through implementation of the Mitigation, Monitoring, and

Reporting Program (MMRP), which has been included at Chapter 11 in this Final PEIR. The following text changes have been made to Mitigation Measures 3.3-2a, 3.3-2c on page 3.3-16.

Mitigation Measure 3.3-2a: Prior to any ground-disturbing activities, the ~~The~~ implementing agencies shall have a qualified biologist conduct a pre-construction spring/summer active season reconnaissance survey for nesting/roosting special-status mobile bird and bat species, and other nesting birds within ~~450~~ 300 feet (500 feet for raptors) of the construction limits of each project element to determine and map the location and extent of special-status species occurrence(s) that could be affected by the project.

Mitigation Measure 3.3-2c: If construction and vegetation removal is proposed for the bird nesting period February 1 through August 31, then preconstruction surveys for nesting/roosting bird and bat species shall begin 30 days prior to construction disturbance with subsequent weekly surveys, the last one being no more than three days prior to work initiation. The surveys shall include habitat within 300 feet (500 feet for raptors) of the construction limits. ~~then a~~Active nest sites located during the pre-construction surveys shall be avoided and a non-disturbance buffer zone established dependent on the species and in consultation with the USFWS and CDFG. This buffer zone shall be delineated in the field with flagging, stakes or construction fencing. Nest sites shall be avoided with approved non-disturbance buffer zones until the adults and young are no longer reliant on the nest site for survival as determined by a qualified biologist. For species with high site fidelity, such as Swainson's hawk, if direct take of nests outside of the breeding seasons is required, the implementing agency shall contact CDFG to determine appropriate mitigation measures.

The following Mitigation Measure has been added on page 3.3-17.

Mitigation Measure 3.3-2g: The implementing agencies shall instruct construction personnel on the importance of buffer zones and sensitivity of the delineated areas.

Comment CDFG-8

The comment recommends that focused spring and botanical surveys be performed as project phases are implemented. The comment concurs with the PEIR mitigation measures for avoidance of special-status botanical species and restoration of disturbed areas. The comment recommends methods for performing botanical surveys and recommends habitat acquisition instead of restoration for mitigation of direct impacts to special-status plant species.

Response CDFG-8

The following text changes have been made to Mitigation Measures 3.3-3a, 3.3-3b and 3.3-3d on pages 3.3-17 and 3.3-18.

Mitigation Measure 3.3-3a: The implementing agencies shall have a qualified biologist conduct a pre-construction spring/summer floristic inventory and rare plant survey of the proposed project areas in accordance with CDFG's *Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities*, revised May 8, 2000, to determine and map the location and extent of special-status plant

species populations within the construction right-of-way. The survey shall be conducted during the appropriate flowering time for target plant species.

Mitigation Measure 3.3-3b: If not possible to avoid, the implementing agencies shall minimize impacts on special-status plant species by reducing the construction right-of-way through areas with potential occurrences of special-status plant species. For unavoidable impacts to special-status species, consultation with CDFG shall be required to determine the impact area and further mitigation, which could include acquisition of habitat of equal or superior value at a ratio of at least 2:1.

Mitigation Measure 3.3-3d: ~~If re-vegetation is required, a detailed re-vegetation and special-status plant restoration program will~~ The implementing agencies shall restore all disturbed areas back to pre-construction conditions and a restoration plan shall be developed and implemented and will contain that contains the following items: responsibilities and qualifications of the personnel to implement and supervise the plan; ~~site selection;~~ site preparation and planting implementation; schedule; maintenance plan/guidelines; and monitoring plan; ~~long term preservation; and performance standards.~~ It is recommended that long term preservation of restored areas include a permanent open space designation in perpetuity.

Comment CDFG-9

The comment recommends more stringent mitigation for Joshua Tree Woodlands and other Native Vegetation other than just compliance with the City of Palmdale's Native Desert Vegetation Ordinance.

Response CDFG-9

The following text change has been made to Mitigation Measures 3.3-4b on page 3.3-18 and Mitigation Measure 3.3-4c has been added.

Mitigation Measure 3.3-4b: Prior to the commencement of grading activities for any component of the proposed project, a qualified biologist/arborist shall be consulted to determine the biological/aesthetic value of potentially impacted trees under the jurisdiction of the Palmdale Native Desert Vegetation Ordinance. For protected vegetation located within the final impact areas, a proposal application would be necessary, including a desert vegetation preservation plan which depicts the location of each Joshua tree and California juniper, details tree age and health, and describes which can be saved and maintained on the site or relocated. A permit must be obtained from the City of Palmdale's landscape architect prior to removal of protected vegetation, which may require mitigation in the form of replacement plantings of all impacted vegetation ~~at a ratio to be determined by the City of Palmdale.~~

Mitigation Measure 3.3-4c: If avoidance of Joshua tree woodlands or other special-status vegetative community is not feasible, the implementing agencies shall acquire off-site habitat of equal or superior quality at a no less than a 2:1 ratio within remaining habitat in the Antelope Valley. Location, terms and conditions for habitat acquisition, protection, and maintenance shall be determined through consultation with resource agencies, including CDFG

Comment CDFG-10

The comment states that the project may result in impacts to jurisdictional drainages from trenching, grading and other project disturbances and that a Streambed Alteration Agreement (SAA) is required.

Response CDFG-10

The PEIR acknowledges that if project implementation results in impacts to jurisdictional drainages, the implementing agencies will secure a SAA or get documentation stating that one is not required. The PEIR identifies potential impacts to lake, stream, and riparian resources and listed species, and provides adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the SAA. The MMRP is included in Chapter 11 of the Final PEIR. Also, the project description states that construction methods such as jack and bore tunneling and directional drilling will be used under sensitive waterways to avoid impacts to these waterways to the extent feasible.

Mojave Desert Air Quality Management District, August 15, 2008**Comment MDAQMD-1**

The comment recommends that Table 3.2-3 County Attainment Status on page 3.2-7 of the PEIR be updated.

Response MDAQMD-1

In response to this comment, the following changes were made to Table 3.2-3.

**TABLE 3.2-3:
COUNTY ATTAINMENT STATUS**

Pollutant	Designation/Classification			
	Federal Standards		State Standards	
	Los Angeles	Kern	Los Angeles	Kern
Ozone – one hour	No Federal Standard ^a	No Federal Standard ^a	Nonattainment	Nonattainment
Ozone – eight hour	Severe Nonattainment; <u>Classified Severe-17</u>	Nonattainment	Unclassified	Unclassified
PM10	Serious Nonattainment <u>Unclassified</u>	Nonattainment	Nonattainment	Nonattainment
PM2.5	Nonattainment <u>Unclassified/attainment</u>	Nonattainment	Nonattainment	Unclassified
CO	Unclassifiable Attainment	Attainment	Attainment	Unclassified
Nitrogen Dioxide	Unclassified/Attainment	Unclassified	Attainment	Attainment
Sulfur Dioxide	Unclassified	Unclassified	Attainment	Attainment
Lead	No Designation	No Designation	Attainment	Attainment
Hydrogen Sulfide	No Federal Standard	No Federal Standard	Unclassified	Unclassified
Sulfates	No Federal Standard	No Federal Standard	Attainment	Unclassified
Visibility-Reducing Particles	No Federal Standard	No Federal Standard	Unclassified	Unclassified

Comment MDAQMD-2

The comment expresses agreement that the proposed mitigation measures for air quality represent feasible mitigation.

Response MDAQMD-2

No response is required.

Regional Water Quality Control Board, Lahontan Region, October 3, 2008

Comment RWQCB-1

The comment notes that the project will require preparation of a salt management plan.

Response RWQCB-1

The PEIR notes on page 3.7-24 that the application of recycled water could increase total dissolved solids (TDS) loading to local groundwater. Mitigation Measure 3.7-5 commits implementing agencies to adopting user agreements with end users that include provisions for managing recycled water application methods to protect groundwater quality. The PEIR notes that the SWRCB is currently drafting a state-wide policy for Regional Boards to prepare salt management plans for groundwater basins with recycled water projects. This policy is not yet adopted and may change prior to the policy's adoption. Nonetheless, it is likely that future recycled water projects will be required to comply with regional salt management plans that outline water quality, application, treatment, and monitoring requirements. The goal of the SWRCB policy will be to provide state-wide consistency for regulation of recycled water projects and provide the means of obtaining compliance with the state's Groundwater Anti-Degradation Policy. In response to this comment, Mitigation Measure 3.7-5 has been changed to Mitigation Measure 3.7-5a, and the following text and mitigation measure have been added to page 3.7-24 and 3.7-25 as follows:

SWRCB has acknowledged that use of recycled water for irrigation or other water supply augmentation can affect concentrations of salts and nutrients in groundwater basins, in excess of the water quality objectives established in Basin Plans. The regulation of recycled water itself is not adequate to address this issue; rather, SWRCB is drafting a policy that recommends Salt Management Plans (SMPs) for basins and watersheds to manage salts and nutrients from all water sources, including recycled water (SWRCB, 2008d). Currently, the draft policy suggests these SMPs would be basin-wide and would be funded pursuant to Water Code Sections 10750 *et seq.* The SMPs could require monitoring plans and a network of stations to monitor salt concentrations in groundwater for consistency with applicable water quality objectives. In addition, the SMPs could require implementation measures for sustainable management of salt and nutrient loading and an anti-degradation analysis demonstrating compliance with Resolution 68-16 for projects included in the plan. The SWRCB policy would not prevent stakeholders from developing a SMP that is more protective of water quality than the Basin Plan. This policy is still in draft format and may change in the future. Upon adoption of a Recycled Water Policy by SWRCB, the proposed project would be subject to all requirements of the policy, including salt management plans (Mitigation Measure 3.7-5b).

Mitigation Measure 3.7-5b: The implementing agencies, in consultation with the Lahontan RWQCB, shall develop and implement a salt management plan, if needed in the future, to reduce the potential for salt and nutrient loading and minimize impacts to water quality in the Antelope Valley groundwater basin..

In addition, the following changes have been made to the discussion for Impact 3.7-10 on pages 3.7-29 and 3.7-30:

Implementation of Recycled Water User Agreements as required by Mitigation Measure 3.7-5a would ensure minimal impacts to water quality due to the use of recycled water at agricultural reuse sites. Implementation of Mitigation Measure 3.7-5b would ensure minimal impacts to water quality due to the use of recycled water for all end uses, once the SWRCB adopts its Recycled Water Policy requiring implementation of SMPs.

Mitigation Measures

Implementation of Mitigation Measure 3.7-5a and 3.7-5b.

Significance after Mitigation: Less than significant.

Comment RWQCB-2

The comment asks if the PEIR is intended to cover all Title 22 end uses listed in Table 1-2.

Response RWQCB-2

The PEIR notes on page 2-17 that the PEIR provides analysis for uses listed in Table 1-2 including but not limited to “irrigation of parks, schools, golf courses, sports complexes (e.g., Lancaster National Soccer Center), freeways, greenbelts, cemeteries, and landfills; landscape impoundments; fire suppression; city maintenance and street cleaning operations; culvert jetting; and construction applications, such as dust control.” The PEIR is clear to note that some end uses such as any agriculture, some industrial projects, and groundwater recharge are covered at a program level only and could be implemented in the future only following subsequent CEQA evaluation. In response to the comment, for clarification Table 1-2 has been revised to indicate those uses for which the PEIR provides project-level detail. The end uses evaluated at the project level are highlighted and shown in bold typeface in Table 1-2 on page 1-16 and 1-17. These applications would not require additional CEQA evaluation prior to implementation. The other uses identified in the table are covered at a program level requiring additional CEQA compliance prior to implementation.

In addition, the following text change has been made on page 1-6:

It is the intention of this PEIR to provide **project-level** assessments of the following components of the proposed project. The analysis of these components is conducted at a sufficient level of detail such that additional environmental documentation is not necessary. In other words, the following project components are evaluated at a level of detail that is typically provided in a project EIR (*CEQA Guidelines* §15161).

- Construction and operation of proposed recycled water pipelines; and

- Application of recycled water for municipal and industrial (M&I) end uses (e.g., landscape irrigation) as identified in Table 1-2.¹

In addition, the following text change has been made on page 1-14:

Table 1-2 summarizes the suitable uses of recycled water as defined by the December 2000 revision of Title 22 and identifies in bold typeface the end uses covered at the project level in this PEIR, as explained above in Section 1.4.3.

In addition, the following text change has been made on page 2-3:

As explained in Chapter 1, Introduction and Project Background, the analyses in this PEIR are intended to provide **project-level coverage** for the following project components: construction and operation of the recycled water pipelines and M&I applications for recycled water as identified in bold typeface in Table 1-2.

¹ Municipal and industrial (M&I) end uses do not include residential land uses. This PEIR does not include coverage of residential landscape irrigation.

**TABLE 1-2
REGULATORY REQUIREMENTS FOR RECYCLED WATER USES IN CALIFORNIA^a**

Use of Recycled Water	Treatment Level			
	Disinfected Tertiary Recycled Water	Disinfected Secondary-2.2 Recycled Water	Disinfected Secondary-2.3 Recycled Water	Undisinfected Secondary Recycled Water
Irrigation				
Food crops where recycled water contacts the edible portion of the crop, including all root crops	Allowed	Not allowed	Not allowed	Not allowed
Parks and playgrounds	Allowed	Not allowed	Not allowed	Not allowed
School yards	Allowed	Not allowed	Not allowed	Not allowed
Residential landscaping	Allowed	Not allowed	Not allowed	Not allowed
Unrestricted-access golf courses	Allowed	Not allowed	Not allowed	Not allowed
Any other irrigation uses not prohibited by other provisions of the California Code of Regulations	Allowed	Not allowed	Not allowed	Not allowed
Food crops, surface-irrigated, above-ground edible portion, and not contacted by recycled water	Allowed	Allowed	Not allowed	Not allowed
Cemeteries	Allowed	Allowed	Allowed	Not allowed
Freeway landscaping	Allowed	Allowed	Allowed	Not allowed
Restricted-access golf courses	Allowed	Allowed	Allowed	Not allowed
Ornamental nursery stock and sod farms with unrestricted public access	Allowed	Allowed	Allowed	Not allowed
Pasture for milk animals for human consumption	Allowed	Allowed	Allowed	Not allowed
Nonedible vegetation with access control to prevent use as a park, playground or school yard	Allowed	Allowed	Allowed	Not allowed
Orchards with no contact between edible portion and recycled water	Allowed	Allowed	Allowed	Allowed
Vineyards with no contact between edible portion and recycled water	Allowed	Allowed	Allowed	Allowed
Non food-bearing trees, including Christmas trees not irrigated less than 14 days before harvest	Allowed	Allowed	Allowed	Allowed
Fodder and fiber crops and pasture for animals not producing milk for human consumption	Allowed	Allowed	Allowed	Allowed
Seed crops not eaten by humans	Allowed	Allowed	Allowed	Allowed
Food crops undergoing commercial pathogen-destroying processing before consumption by humans	Allowed	Allowed	Allowed	Allowed
Supply for Impoundment				
Nonrestricted recreational impoundments, with supplemental monitoring for pathogenic organisms	Allowed	Not allowed	Not allowed	Not allowed
Restricted recreational impoundments and publicly accessible fish hatcheries	Allowed	Allowed	Not allowed	Not allowed
Landscape impoundments without decorative fountains	Allowed	Allowed	Allowed	Not allowed
Supply for Cooling or Air Conditioning				
Industrial or commercial cooling or air conditioning involving cooling tower, evaporative condenser, or spraying that creates a mist	Allowed	Not allowed	Not allowed	Not allowed
Industrial or commercial cooling or air conditioning not involving cooling tower, evaporative condenser, or spraying that creates a mist	Allowed	Allowed	Allowed	Not allowed

TABLE 1-2 (continued)
REGULATORY REQUIREMENTS FOR RECYCLED WATER USES IN CALIFORNIA^a

Use of Recycled Water	Treatment Level			
	Disinfected Tertiary Recycled Water	Disinfected Secondary-2.2 Recycled Water	Disinfected Secondary-23 Recycled Water	Undisinfected Secondary Recycled Water
Other Uses				
Groundwater Recharge	Allowed under special case-by-case permits by RWQCBs ^d			
Flushing toilets and urinals	Allowed	Not allowed	Not allowed	Not allowed
Priming drain traps	Allowed	Not allowed	Not allowed	Not allowed
Industrial process water that may contact workers	Allowed	Not allowed	Not allowed	Not allowed
Structural fire fighting	Allowed	Not allowed	Not allowed	Not allowed
Decorative fountains	Allowed	Not allowed	Not allowed	Not allowed
Commercial laundries	Allowed	Not allowed	Not allowed	Not allowed
Consolidation of backfill material around potable water pipelines	Allowed	Not allowed	Not allowed	Not allowed
Artificial snow making for commercial outdoor uses	Allowed	Not allowed	Not allowed	Not allowed
Commercial car washes, not heating the water, excluding the general public from washing process	Allowed	Not allowed	Not allowed	Not allowed
Industrial process water that will not come into contact with workers	Allowed	Allowed	Allowed	Not allowed
Industrial boiler feed	Allowed	Allowed	Allowed	Not allowed
Nonstructural fire fighting	Allowed	Allowed	Allowed	Not allowed
Backfill consolidation around nonpotable piping	Allowed	Allowed	Allowed	Not allowed
Soil compaction	Allowed	Allowed	Allowed	Not allowed
Mixing concrete	Allowed	Allowed	Allowed	Not allowed
Dust control on roads and streets	Allowed	Allowed	Allowed	Not allowed
Cleaning roads, sidewalks and outdoor work areas	Allowed	Allowed	Allowed	Not allowed
Flushing sanitary sewers	Allowed	Allowed	Allowed	Allowed

NOTE: End uses identified in bold typeface and shading are covered at the project level in this PEIR.

^a Refer to the full text of the December 2, 2000 version of Title 22: California Code of Regulations, Chapter 3 Water Recycling Criteria. This chart is only an informal summary of the uses allowed in this version. The complete and final 12/02/2000 version of the adopted criteria can be downloaded from: <http://www.cdph.ca.gov/healthinfo/environhealth/water/Pages/Waterrecycling.aspx>.

^b Allowed with "conventional tertiary treatment." Additional monitoring for two years or more is necessary with direct filtration.

^c Drift eliminators and/or biocides are required if public or employees can be exposed to mist.

^d Refer to Groundwater Recharge Guidelines, available from the CDPH.

SOURCE: WaterReuse Association, Recycled Water Uses Allowed in California, <http://www.watereuse.org/ca/usestable.html>, 1/3/2008.

The following text change has been made on page 2-18:

The customer locations, both existing and future, are identified in Figure 2-2. M&I applications for recycled water that are covered at the project level in this PEIR are highlighted in bold typeface in Table 1-2 and include, but are not limited to, the following...

Table 2-1 on page 2-6 has been revised as shown:

**TABLE 2-1
CEQA COVERAGE BY PROJECT COMPONENT**

Project-Level Analysis	Program-Level Analysis
Construction/Operation of Recycled Water Pipeline	Construction/Operation of Pump Stations
End Use: M & I Applications (<u>see Table 1-2</u>)	Construction/Operation of Storage Reservoirs
	End Use: Agricultural Irrigation
	End Use: Power Plant Cooling Water
	End Use: Groundwater Recharge

SOURCE: ESA, 2008.

Comment RWQCB-3

The comment requests clarification for the source of recycled water to be used in the backbone system.

Response RWQCB-3

As noted on page 2-20, the backbone system would convey water produced at either the Lancaster WRP, the Palmdale WRP, or the RWWTP. The backbone system has been designed as a conveyance system for recycled water only.

Comment RWQCB-4

The comment states that the mitigation measures identified for recharge of recycled water are not adequate since they lack specific project components.

Response RWQCB-4

The PEIR notes on page 2-18 that groundwater recharge projects are evaluated in this document at a program level only. Program-level EIRs provide general discussion of impacts, alternatives and mitigation measures. As specific projects are developed, subsequent CEQA documents that tier off of the program EIR are subject to mitigation measures adopted by the Lead Agency in the program EIR. Subsequent project-level CEQA documents provide detailed analysis of project impacts and provide site-specific mitigation measures and specific project alternatives.

For the proposed project, project specifics are not yet developed for any particular recharge project. Subsequent CEQA compliance would be required prior to implementation of a recycled water groundwater recharge project. The purpose of the program-level mitigation measures is to frame the potential issues and to commit implementing agencies to focus on implementing water quality monitoring, blending, and retention duration requirements. The PEIR concludes that with proper management and oversight in conjunction with local regulating authorities, groundwater recharge using recycled water can be an effective means of augmenting local water supply without jeopardizing water quality or public health.

Comment RWQCB-5

The comment identifies a discrepancy in the Executive Summary on page ES-28.

Response RWQCB-5

In response to this comment, Impact 4-5 has been correctly labeled in Section 4 and Table ES-1 has been revised to include Impact 4-5.

Comment RWQCB-6

The comment states that prior to recycled water use, the system operators will be required to show compliance with the Anti-Degradation Policy and obtain discharge permits from the RWQCB.

Response RWQCB-6

The PEIR notes on page 2-22 that WDRs/WRRs from the RWQCB would be necessary prior to initiating recycled water use. The SWRCB is currently drafting a Recycled Water Policy (see response to comment RWQCB-1) that addresses, among other things, Anti-Degradation requirements in accordance with Resolution No. 68-16. The implementing agencies shall comply with any Anti-Degradation requirements mandated in the SWRCB final Recycled Water Policy once it is adopted. If a consistency statement is required by the RWQCB prior to initiating recycled water use in accordance with the final Recycled Water Policy, then the implementing agencies shall comply.

Comment RWQCB-7

The comment notes that a SWPPP would be required for construction or stream crossings.

Response RWQCB-7

The PEIR acknowledges that construction activities could affect storm water runoff quality. Mitigation Measure 3.7-2 commits the implementing agencies to preparing and implementing BMPs during construction to comply with RWQCB storm water discharge permit requirements. The PEIR acknowledges that any construction activities affecting streams would be subject to RWQCB and CDFG approval.

Department of Transportation (Caltrans) District 7, Regional Planning, September 11, 2008

Comment CaltransD7-1

The comment states that any work to be performed within the State Right-of-Way will need an encroachment permit from Caltrans.

Response CaltransD7-1

The PEIR on page 2-22 states that the implementing agencies would use the analysis contained within the PEIR to support the acquisition of a roadway encroachment permit/easement from Caltrans.

Comment CaltransD7-2

The comment states that the proposed project needs to be designed to discharge clean storm water runoff.

Response CaltransD7-2

Mitigation Measure 3.7-2 on page 3.7-22 of the PEIR requires that the implementing agencies implement Best Management Practices (BMPs) to reduce pollutants in storm water discharges. In addition, Mitigation Measure 3.6-2a on page 3.6-9 of the PEIR requires that BMPs for handling hazardous materials during the project are implemented. Once construction of the pipeline is completed, roadways would be restored to their pre-existing condition and would not be expected to result in increased storm water runoff.

Comment CaltransD7-3

The comment states that any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. The comment also states that a truck/traffic construction management plan is needed for the project and recommends that large size truck trips be limited to off-peak commute periods.

Response CaltransD7-3

Page 3.11-4 of the PEIR states that permits from Caltrans would be required for transportation of oversized loads and for transportation of certain materials. Mitigation Measure 3.11-1a on page 3.11-5 of the PEIR requires that a Traffic Control/Traffic Management Plan be prepared and implemented prior to construction. The plan would identify the hours of construction and hours for deliveries of materials.

Department of Transportation (Caltrans) District 9, August 20, 2008

Comment CaltransD9-1

The comment states that jack and bore is the approved method for pipeline installation under the highway. Work to be performed at the Gaskell Road location will need an encroachment permit from Caltrans.

Response CaltransD9-1

The PEIR on page 2-18 states that the pipeline would be installed by either trenching, jack-and-bore tunneling, or directional drilling. The EIR evaluates the potential impacts of using jack-and-bore tunneling methods. The PEIR on page 2-22 commits the implementing agencies to obtaining

a roadway encroachment permit/easement from Caltrans prior to project implementation. Jack-and-bore tunneling methods will be used as required by Caltrans.

Comment CaltransD9-2

The comment states that the Roadway Network section on page 3.11-1 should include a description of State Route 14 and the proposed pipeline crossing.

Response CaltransD9-2

In response to this comment, the following description of State Route 14 has been added to the Roadway Network section of the Final PEIR.

State Route 14 is a north-south state highway that passes through Palmdale and Lancaster and runs concurrently with State Route 138 from their junction in Palmdale to north of Lancaster. The pipeline would cross under State Route 14 at Gaskell Road, Avenue K, and Avenue P.

County of Los Angeles Airport Land Use Commission, August 21, 2008

Comment ALUCP-1

The comment states that since the project does not involve any changes in land uses, it does not fall under the purview of the Airport Land Use Commission. The comment also expresses agreement that the safety issues related to project construction within the Airport Influence area are properly addressed.

Response ALUCP-1

No response is required.

County Sanitation Districts of Los Angeles, October 7, 2008

Comment LACSDa-1

The comment requests that additional information be added to the description of LACSD in Chapter 1 of the PEIR.

Response LACSDa-1

The following text change has been made to the second paragraph on page 1-12 of the Final PEIR.

District 14 owns and operates the LWRP and the adjoining approximately 64-mile network of trunk sewers.

Comment LACSDa-2

The comment requests that the text be clarified to indicate that RCSD's acquisition of additional recycled water from Los Angeles County would be subject to availability.

Response LACSDa-2

The following text change has been made to the fifth paragraph on page 1-12 of the Final PEIR.

Future demand for recycled water in the Rosamond area could surpass the projected treatment capacity of the Rosamond WWTP, in which case RCSD would attempt to acquire an additional 1.5 to 3.0 mgd of disinfected tertiary treated recycled water from suppliers in Los Angeles County, conveying it by pipeline to RCSD's recycled water distribution pipelines.

Comment LACSDa-3

The comment indicates that 16 mgd is not the actual permitted capacity of the Lancaster Water Reclamation Plant (LWRP) and a correction should be made to the text.

Response LACSDa-3

The following text change has been made to the sixth paragraph on page 1-12 of the Final PEIR.

Currently, LWRP has a permitted capacity of ~~16~~ 18 mgd, of which 0.6 mgd is tertiary-treated effluent and the remaining is secondary-treated effluent.

Comment LACSDa-4

The comment requests that additional information be added to the text regarding where the effluent from the Antelope Valley Tertiary Treatment Plant is conveyed to.

Response LACSDa-4

The following text change has been made to the first paragraph on page 1-13 of the Final PEIR.

Tertiary treatment is provided by the Antelope Valley Tertiary Treatment Plant (AVTTP), which is located onsite at the LWRP. Currently, the effluent from the AVTTP is conveyed to Apollo Lakes Regional County Park and to agricultural irrigation at LACSD-owned facilities.

Comment LACSDa-5

The comment requests that the use of secondary-treated effluent for maintenance of the Piute Ponds be clarified.

Response LACSDa-5

The following text change has been made to the first paragraph on page 1-13 of the Final PEIR.

The secondary-treated effluent from the LWRP currently is stored in reservoirs, or used for irrigation of fodder crops at Nebeker Ranch, or used to maintain ~~a minimum of 200 Piute Ponds at its current area of 400 wetted acres of habitat suitable for recreational duck hunting at Piute Ponds.~~

Comment LACSDa-6

The comment requests that the temporary tertiary treatment process at the LWRP be mentioned in the description of the LWRP.

Response LACSDa-6

The following text has been added to the first paragraph on page 1-13 of the Final PEIR.

Tertiary treated effluent is also being temporarily produced by a 1.0-mgd Membrane Bioreactor located in the LWRP.

Comment LACSDa-7

The comment requests that the text be edited to reflect that LACSD No. 14 has already purchased additional land to manage the increase effluent production.

Response LACSDa-7

The following text change has been made to the second paragraph on page 1-13 of the Final PEIR.

To manage the increased effluent production, LACSD No. 14 has purchased ~~will purchase~~ land for additional storage reservoirs and for implementation of agricultural activities whereby the recycled water is used for irrigation.

Comment LACSDa-8

The comment requests that a discussion of LACSD No.14's commitment to diverting recycled water from agricultural operations to serve other emerging recycled water end uses be added to the Final PEIR.

Response LACSDa-8

The following text has been added to the second paragraph on page 1-13 of the Final PEIR.

The proposed project would provide additional management options and beneficial uses for the disinfected tertiary-treated effluent produced at the LWRP. LACSD No. 14 has committed to diverting recycled water from its agricultural operations to serve other emerging recycled water end uses in the region as they become available.

Comment LACSDa-9

The comment indicates that the effluent from the PWRP is not land applied and requests that the text be edited to reflect this.

Response LACSDa-9

The following text change has been made to the third paragraph on page 1-13 of the Final PEIR.

The effluent from the PWRP is ~~either land applied (for percolation into the ground) or used to irrigate trees and fodder crops on land leased from Los Angeles World Airports (LAWA).~~

Comment LACSDa-10

The comment requests that the discussion of planned upgrades to the Palmdale Water Reclamation Plant be clarified.

Response LACSDa-10

The following text change has been made to the fourth paragraph on page 1-13 of the Final PEIR.

LACSD No. 20 plans to ~~increase~~ upgrade the ~~capacity of the~~ PWRP to 12 mgd of disinfected tertiary treatment by 2011, ~~providing disinfected tertiary treatment for all incoming wastewater.~~

Comment LACSDa-11

The comment requests that the text be edited to reflect that LACSD No. 20 has already purchased additional land to for storage reservoirs and for implementing agricultural reuse.

Response LACSDa-11

The following text change has been made to the fourth paragraph on page 1-13 of the Final PEIR.

To manage the increased effluent production, LACSD No. 20 would cease land application and instead use the tertiary-treated effluent for agricultural irrigation such that recycled water is applied at agronomic rates in order to protect groundwater. Similar to LACSD No. 14, LACSD No. 20 ~~has would~~ has ~~acquired~~ will land for storage reservoirs and for implementing agricultural reuse.

Comment LACSDa-12

The comment notes that the latest available draft regulations are now the Draft Recycled Water Policy published in August 2008.

Response LACSDa-12

The following text change has been made to the fourth paragraph on page 1-15 of the Final PEIR.

The purpose of the draft regulations is to protect public health and the quality of the groundwater resources to be used for drinking water supplies. The latest available draft regulations, published ~~January 2007~~ August 2008, define a groundwater recharge reuse project (GRRP) as a project that uses recycled water and has been planned and is operated for the purpose of recharging a groundwater basin designated in a Water Quality Control

Plan (Basin Plan) for use as a source of domestic water supply, and that has been identified as a GRRP by a Regional Water Quality Control Board (RWQCB).

Comment LACSDa-13

The comment notes that UV light reduces but does not eliminate NDMA concentrations in recycled water.

Response LACSDa-13

The following text change has been made to the last paragraph on page 3.7-15 of the Final PEIR.

UV light can be used to reduce ~~eliminate~~ NDMA concentrations in ~~from~~ recycled water.

Comment LACSDa-14

The comment notes that both Lake Palmdale and the California Aqueduct are waters of the U.S. and that the discussion regarding SWWPs should be edited to reflect this.

Response LACSDa-14

The following text change has been made to the first paragraph on page 3.7-17 of the Final PEIR.

As described above, there are no waters of the U.S. in the project area that are subject to RWQCB storm water pollution prevention requirements.

Comment LACSDa-15

The comment suggests that LACWWD40 should confirm the language in Mitigation Measure 3.7-1d on page 3.7-20 of the PEIR with LACDPH.

Response LACSDa-15

Mitigation Measure 3.7-1d commits implementing agencies to obtaining approval from LACDPH prior to operating the recycled water system. Implementing agencies would be required to obtain approval from LACDPH for operation of the backbone system as noted on page 2-22 of the PEIR.

Comment LACSDa-16

The comment notes that the reclaimed effluent from the LWRP and the PWRP is not coagulated before it is used as a source of supply.

Response LACSDa-16

The following text change has been made to the last paragraph on page 3.7-24 of the Final PEIR.

To be used as a source supply for these designations, the reclaimed effluent would at all times be adequately oxidized, ~~coagulated~~, clarified, filtered, and disinfected effluent.

Comment LACSDa-17

The comment recommends discussing salinity management plans to control salts in the basin.

Response LACSDa-17

The PEIR notes on page 3.7-24 that the application of recycled water could increase total dissolved solids (TDS) loading to local groundwater. Mitigation Measure 3.7-5 commits implementing agencies to adopting user agreements with end users that include provisions for managing recycled water application methods to protect groundwater quality. The PEIR notes that the SWRCB is currently drafting a state-wide policy for Regional Boards to prepare salinity management plans for groundwater basins. This policy is not yet adopted and may change prior to the policy's adoption. Nonetheless, it is likely that future recycled water systems will be required to comply with regional salt management plans that outline water quality, application, treatment, and monitoring requirements. The goal of the SWRCB policy will be to provide state-wide consistency for regulation of recycled water projects and provide the means of obtaining compliance with the state's Groundwater Anti-Degradation Policy. See response to comment RWQCB-1.

Comment LACSDa-18

The comment suggested that a grammatical error be corrected.

Response LACSDa-18

The following text has been added to the second paragraph on page 3.7-29 of the Final PEIR.

Surface water quality also could be affected if over-application of recycled water resulted in surface ponding or direct runoff to local creeks or other ~~waterbodies~~ water bodies.

Comment LACSDa-19

The comment indicates that details regarding the groundwater recharge pilot project have been changed.

Response LACSDa-19

The first paragraph on page 3.7-30 describing Lancaster's GWR-RW Pilot Project was provided by the City of Lancaster. Minor details of the Pilot Project have changed; however, the intent, scale, location, and application of the GWR-RW Pilot Project have not changed. The comment has been noted; no changes have been made to the Final PEIR.

Comment LACSDa-20

The comment suggests changing the project implementation status of the LACSD projects to in progress in Table 4-1.

Response LACSDa-20

In response to this comment, the following changes were made to Table 4-1.

**TABLE 4-1
ANTELOPE VALLEY RELATED PROJECTS**

Project Name	Project Type	Project Sponsor	Project Implementation
Water Supply Projects			
Littlerock Dam Sediment Removal Project	Reservoir expansion, flood control	Palmdale Water District	2008-2011
Upper Amargosa Creek Recharge, Flood Control & Habitat Restoration	Groundwater recharge	City of Palmdale	2008-2011
Recycled Water Projects			
LWRP 2020 Facilities Plan	Recycled water application	LACSD No. 14	In progress
PWRP 2025 Facilities Plan	Recycled water application	LACSD No. 20	In progress-2009-2014
City of Lancaster Division Street Recycled Water Project	Recycled water application	City of Lancaster	In progress
City of Lancaster Groundwater Recharge Project	Groundwater recharge	City of Lancaster	2009-2011
Rosamond Recycled Water Project	Recycled water pipeline, Recycled water application	RCSD	2009-2011
PWD Groundwater Recharge Reuse Projects	Groundwater recharge	Palmdale Water District	2010-2015
Wastewater Projects			
LWRP 2020 Facilities Plan	Treatment plant expansion	LACSD No. 14	In progress
PWRP 2025 Facilities Plan	Treatment plant expansion	LACSD No. 20	In progress-2014
RWWTP Expansion	Treatment plant expansion	RCSD	In progress

Comment LACSDa-21

The comment requests that the discussion of planned upgrades to the Palmdale Water Reclamation Plant be clarified.

Response LACSDa-21

The following text change has been made to the fourth paragraph on page 4-4 of the Final PEIR.

The ~~capacity of the PWRP will be increased~~ upgraded to 12 mgd of disinfected tertiary treatment by 2011, ~~providing tertiary treatment for all incoming wastewater~~ (LACSD, 2005).

Comment LACSDa-22

The comment indicates that details regarding the groundwater recharge pilot project have been changed.

Response LACSDa-22

The details regarding Lancaster's groundwater recharge pilot project were provided by the City of Lancaster and are consistent with the description found on page 3.7-30 of the PEIR. See response to comment LACSDa-19. The comment has been noted; no changes have been made to the Final PEIR.

Comment LACSDa-23

The comment requests that the build-out design capacity of 17,491 afy for the project be clarified.

Response LACSDa-23

The proposed recycled water pipeline has been designed to accommodate potential future demand for M&I end users in the Antelope Valley, including 17,491 afy in Los Angeles County as identified in 2006 Facilities Plan and 1,119 afy in Kern County in the Rosamond area, for a total of 18,610 afy. The text on page 4-10 of the Final PEIR has been changed as follows:

The recycled water pipeline component of the proposed project would be designed to deliver approximately 17,491 afy of recycled water (at buildout) to M&I users ~~within the region in Los Angeles County~~ and 1,110 afy of recycled water to M&I users in Kern County.

In addition, the text on page 2-3 has been changed as follows to include potential future M&I demand in the Rosamond area:

For existing and future end users identified to-date, the annual demand for recycled water in the Antelope Valley is estimated at a minimum of ~~20,091~~ 21,210 afy at buildout (~~Kennedy/Jenks, 2006~~). The system capacity of the proposed project would be designed to meet this demand. This demand includes 17,491 afy for M&I end uses ~~in the project area in Los Angeles County~~ as estimated in the *Final Facilities Planning Report* (~~Kennedy/Jenks, 2006~~), plus 1,119 afy for M&I end uses in the RCSD service area in Kern County (Seal, 2008), and 2,600 afy for use as cooling water at the planned Palmdale Hybrid Power Plant described further in Section 2.5.5 below.

In addition, the text on page 2-17 has been changed as follows:

Total estimated recycled water demand at buildout for M&I end users in the Antelope Valley identified to-date is 17,491 afy in Los Angeles County (Kennedy/Jenks, 2006) and 1,119 afy in Kern County (Seal, 2008).

In addition, the text on page ES-3 has been changed as follows:

For existing and future end users identified to-date, the annual demand for recycled water in the Antelope Valley is estimated at ~~20,091~~ 21,210 afy at buildout (~~Kennedy/Jenks, 2006~~). The system capacity of the proposed project would be designed to meet this demand. This demand includes 17,491 afy for M&I end uses ~~in Los Angeles County~~ in the project area (Kennedy/Jenks, 2006), plus 1,110 afy for M&I end uses in Kern County, and 2,600 afy for use as cooling water at the planned Palmdale Hybrid Power Plant.

Comment LACSDa-24

The comment recommends discussing salinity management plans to control salts in the basin.

Response LACSDa-24

The PEIR acknowledges on page 4-10 that groundwater quality could be affected by the cumulative effects of concurrent recharge and extraction projects. The PEIR concludes that management of recharge projects and compliance with Title 22 regulations would effectively manage groundwater quality in the Antelope Valley. Effective groundwater management on a regional level will require cooperation from multiple stakeholders. As noted on page 3.7-9, an adjudication process has been initiated to assist in managing the groundwater basin more effectively for the benefit of all regional stakeholders. In addition, as noted on page 3.7-24 SWRCB is currently developing a statewide general permit for landscape irrigation uses of recycled water, pursuant to AB 1481 that will incorporate salinity management measures. In addition, the SWRCB has prepared draft guidelines for the preparation of Salt Management Plans for recycled water systems throughout California. This policy is not yet adopted and may change prior to the policy's adoption. Nonetheless, it is likely that future recycled water systems will be required to comply with regional salt management plans that outline water quality, application, and treatment requirements. The goal of the SWRCB policy will be to provide state-wide consistency for regulation of recycled water projects and provide the means of obtaining compliance with the state's Groundwater Anti-Degradation Policy. See response to comment RWQCB-1. .

Comment LACSDa-25

The comment notes that the water demand figures in Table 5-3 appear to be less than overall demand in the *2007 Antelope Valley Integrated Regional Water Management Plan*.

Response LACSDa-25

The water demand figures in Table 5-3 are from the per-capita water use projections (Table 4-5) in the *2005 Integrated Urban Water Management Plan for the Antelope Valley* prepared by Kennedy/Jenks for LACWWD40, RCSD, LACSD, and Quartz Hill Water District (Kennedy/Jenks, 2005). The column for "2010" has been revised to correct the error in addition as follows:

**TABLE 5-3
WATER DEMAND PROJECTIONS (AF)**

	2005	2010	2015	2020	2025	2030
District No. 40	58,525	74,884	90,735	106,299	120,762	134,565
Quartz Hill	5,469	6,345	7,360	8,537	9,903	11,488
Rosamond	2,954	4,742	7,036	10,438	15,487	22,977
Subtotal	66,948	46,900 85,971	105,130	125,274	146,152	169,030

SOURCE: RWMG, 2007-2005 Integrated Urban Water Management Plan for the Antelope Valley, Kennedy/Jenks, 2005.

County Sanitation Districts of Los Angeles, October 2, 2008

Comment LACSDb-1

The comment expresses LACSD's support for the proposed project.

Response LACSDb-1

No response required.

Comment LACSDb-2

The comment recommends that the Distribution Pump Station 1A alternative be selected as the final location for the distribution pump station and finds Distribution Pump Station 1 to be an unacceptable alternative.

Response LACSDb-2

The County notes LACSD's preference and looks forward to continued cooperation in designing the backbone system.

Comment LACSDb-3

The comment recommends that the labels used for pipeline construction phasing be linked to the labels for the construction phasing used in the 2006 Final Facilities Planning Report, Antelope Valley Recycled Water Project.

Response LACSDb-3

Figure 2-3 of the PEIR identifies the proposed phasing of the project components. The implementation schedule for the individual components are subject to modification. In response to this comment, Figure 2-3 has been revised slightly to modify the implementation phasing.

Comments LACSDb-4

The comment notes that LACSD does not intend to be a signatory to the Recycled Water System JPA.

Response LACSDb-4

The County recognizes LACSD's position as a non-JPA stakeholder. The following revision to the text on page 2-22 have been made as follows:

The JPA would be distinct from its member agencies, would have its own board of directors, and would be empowered to implement the proposed project. The JPA would include a representative from LACWWD40 and each Responsible Agency, with the exception of LACSD.

Comment LACSDb-5

The comment suggests that the County work closely with LACSD during project design to ensure system efficiency.

Response LACSDb-5

The comment is noted. The County looks forward to continued close coordination with the LACSD and RCSD as product water suppliers and key project stakeholders.

Rosamond Community Services District, October 3, 2008

Comment RCSD-1

The comment requests that location of Reservoir 4 in Table 2-2 be clarified.

Response RCSD-1

The following change has been made to Table 2-2 on page 2-7 of the Final PEIR.

**TABLE 2-2
PROPOSED STORAGE RESERVOIRS**

Reservoir	Location	Capacity (MG)	Figure
Reservoir 1	40 th Street West and Avenue M	3.0	Figure 2-4
Reservoir 2	25 th Street West and Palmdale Blvd/ Elizabeth Lake Road	4.4	Figure 2-5
Reservoir 3	40 th Street East and Barrel Springs Road	2.1	Figure 2-6
Reservoir 4	Near <u>North of</u> 60 th Street West and Mojave-Tropico Road	2.0	Figure 2-7

Comment RCSD-2

The comment requests that additional information be added to the City of Palmdale General Plan policies on page 3.2-12.

Response RCSD-2

Policies ER 5.3.3 and 5.4.2 were copied directly from the City of Palmdale General Plan and should not be modified. No changes were made to the Final PEIR.

Comment RCSD-3

The comment requests that in the Geological Subunits section on page 3.5-3, all references of subunits be changed to subbasins.

Response RCSD-3

According to DWR Bulletin 118 regarding California's groundwater basins, there are no officially designated subbasins in the Antelope Valley. The comment has been noted however no changes were made to the Final PEIR.

Comment RCSD-4

The comment requests that in the Groundwater Subunits section on page 3.7-3, all references of subunits be changed to subbasins.

Response RCSD-4

According to DWR Bulletin 118 regarding California's groundwater basins, there are no officially designated subbasins in the Antelope Valley. The comment has been noted however no changes were made to the Final PEIR.

Comment RCSD-5

The comment requests that the Rosamond Wastewater Treatment Plant (RWWTP) be included in the discussion of where recycled water would be produced.

Response RCSD-5

The following text change has been made to the seventh paragraph on page 3.7-13.

Recycled water produced at the RWWTP, LWRP, and PWRP will be of disinfected tertiary standards making it suitable for all end uses included in Title 22 (see Table 1-2), including M&I and agricultural applications.

Comment RCSD-6

The comment requests that Mitigation Measure 3.7-1d add that the Kern County Department of Public Health should be notified of new recycled water sites located in Kern County.

Response RCSD-6

The following text change has been made to Mitigation Measure 3.7-1d on page 3.7-20.

Mitigation Measure 3.7-1d: Los Angeles County Department of Public Health (DPH), Cross Connection Control Program, or the Kern County Department of Public Health shall be advised of each new site in their respective counties where recycled water is to be used prior to placing the site into service.

Comment RCSD-7

The comment specifies that the proposed project is located in southeastern Kern County, not southwestern Kern County and requests that RCSD be included in the service areas considered for cumulative analysis.

Response RCSD-7

The following text change has been made to the second paragraph on page 4-2. The paragraph states that the service areas for LACWWD40 and all partner agencies were used for the cumulative analysis. The service area for RCSD is within this category. No change to the text was made regarding this part of the comment.

Geographically, the proposed project is located in the Antelope Valley in northern Los Angeles County and ~~southwestern~~ southeastern Kern County.

Comment RCSD-8

The comment requests that additional information regarding Phase I of the Rosamond Recycled Water Project be added to the PEIR.

Response RCSD-8

The following text change has been made to the second paragraph on page 4-5. The paragraph states that the service areas for LACWWD40 and all partner agencies were used for the cumulative analysis. The service area for RCSD is within this category. No change to the text was made regarding this part of the comment.

RCSD is currently constructing a 0.5 million gallons per day tertiary treatment plant adjacent to its existing evaporation ponds.

Comment RCSD-9

The comment requests that an additional 4,000 afy of recycled water demand be added for three planned solar collector power plants in the Rosamond area, in addition to the 2,600 afy of demand for cooling water at the Palmdale Hybrid Power Plant on page ES-3.

Response RCSD-9

The comment has been noted however no changes were made to the Final PEIR. The PEIR assumes that additional recycled water uses may be developed following adoption of the PEIR. Those projects developed subsequent to the adoption of this PEIR may require subsequent CEQA compliance documentation that includes by reference the analysis conducted for this PEIR.

Comment RCSD-10

The comment requests that Mitigation Measure 3.3-4b be edited to include the Kern County Habitat Conservation Plan.

Response RCSD-10

The proposed project is not within the boundaries of the Kern County Valley Floor Habitat Conservation Plan.

Comment RCSD-11

The comment requests that Mitigation Measure 3.3-4b be edited to require that Kern County Environmental Health Services be contacted prior to removal of impacted vegetation.

Response RCSD-11

The following text changes were made to Mitigation Measure 3.3-4b on page 3.3-19 of the Final PEIR.

Mitigation Measure 3.3-4b: Prior to the commencement of grading activities for any component of the proposed project within the City of Palmdale, a qualified biologist/arborist shall be consulted to determine the biological/aesthetic value of potentially impacted trees under the jurisdiction of the Palmdale Native Desert Vegetation Ordinance. For protected vegetation located within the final impact areas, a proposal application would be necessary, including a desert vegetation preservation plan which depicts the location of each Joshua tree and California juniper, details tree age and health, and describes which can be saved and maintained on the site or relocated. A permit must be obtained from the City of Palmdale's landscape architect prior to removal of protected vegetation, which may require mitigation in the form of replacement plantings of all impacted vegetation at a ratio to be determined by the City of Palmdale. Prior to the removal of protected vegetation in Kern County, the Kern County Environmental Health Services shall be contacted.

Comment RCSD-12

The comment requests that page ES-13 of the Executive Summary be modified.

Response RCSD-12

In response to the comment, the following modification has been made to Mitigation Measure 3.4-1a:

Mitigation Measure 3.4-1a: ...All project activities within or adjacent to the *Historical area of Old Palmdale and Old Lancaster and Old Rosamond and Tropico Mine area* shall be monitored by a professional archaeologist as there is a high probability for subsurface feature discovery, which includes (though is not limited to) foundations, cisterns, wells, cesspools, basements, or associated elements of the *Old Palmdale roundhouse spur of the Southern Pacific Railroad*.

Comment RCSD-13

The comment requests that page ES-14 of the Executive Summary be modified.

Response RCSD-13

In response to the comment, the following modification has been made to Mitigation Measure 3.4-4e:

Mitigation Measure 3.4-4e: All project activities within or adjacent to the *Historical area of Old Palmdale and Old Lancaster and Old Rosamond and Tropico Mine area* shall be monitored by a professional archaeologist as there is a high probability for subsurface feature discovery, which includes (though is not limited to) foundations, cisterns, wells, cesspools, basements, or associated elements of the *Old Palmdale roundhouse spur of the Southern Pacific Railroad*. If these elements are identified, mitigation measures shall be employed that include in-field evaluation by a professional archaeologist (per Secretary of the Interior Standards) and possible data recovery, as needed, per a mitigation treatment plan.

Comment RCSD-14

The comment requests that page ES-16 of the Executive Summary be modified since the USACE does not assume jurisdiction over many of the washes in the Antelope Valley. Water features that are not considered waters of the U.S. by USACE are not subject to NPDES permits or SWPPPs.

Response RCSD-14

In order to ensure that construction projects do not result in excessive soil erosion in regions not within USACE jurisdiction, Mitigation Measure 3.5-2 has been modified as follows

Mitigation Measure 3.5-2: To control water and wind erosion during construction of the project, the implementing agencies shall ~~prepare a Stormwater Pollution Prevention Plan (SWPPP) in compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit. The SWPPP shall prescribe temporary~~ ensure that contractors implement Best Management Practices (BMPs) to control wind and water erosion during and shortly after construction of the project and permanent BMPs to control erosion and sedimentation once construction is complete. The BMPs ~~SWPPP would include soil erosion and sediment control measures that could include, but would~~ not be limited to, sediment barriers and traps, silt basins, and silt fences.

Comment RCSD-15

The comment requests that page ES-17 of the Executive Summary be modified since the USACE does not assume jurisdiction over many of the washes in the Antelope Valley. Water features that are not considered waters of the U.S. by USACE are not subject to NPDES permits or SWPPPs.

Response RCSD-15

In order to ensure that construction projects do not result in water quality impacts within regions not within USACE jurisdiction, Mitigation Measure 3.6-2a has been modified as follows

Mitigation Measure 3.6-2a: ~~Consistent with Stormwater Pollution Prevention Plan (SWPPP) requirements,~~ construction contractor(s) shall be required to implement best management practices (BMPs) for handling hazardous materials during the project. The use of the construction BMPs shall minimize negative effects on groundwater and soils, and will include, without limitation, the following:

- Follow manufacturers' recommendations and regulatory requirements for use, storage, and disposal of chemical products and hazardous materials used in construction.
- Avoid overtopping construction equipment fuel tanks.
- During routine maintenance of construction equipment, properly contain and remove grease and oils.
- Properly dispose of discarded containers of fuels and other chemicals.

Comment RCSD-16

The comment requests that page ES-19 of the Executive Summary be modified.

Response RCSD-16

In response to the comment, Mitigation Measure 3.7-1d has been modified as follows

Mitigation Measure 3.7-1d: Los Angeles County Department of Public Health (DPH); Cross Connection Control Program for Los Angeles County and the Kern County Department of Public Health in Bakersfield for Kern County, ~~or the Kern County Department of Public Health~~ shall be advised of each new site ~~in their respective counties~~ where recycled water is to be used prior to placing the site into service.

Comment RCSD-17

The comment requests that page ES-19 of the Executive Summary be modified since the USACE does not assume jurisdiction over many of the washes in the Antelope Valley. Water features that are not considered waters of the U.S. by USACE are not subject to NPDES permits or SWPPPs.

Response RCSD-17

The discussion for Impact 3.7-2 on pages 3.7-20 through 3.7-22 has been revised to omit all mention of a SWPPP. In order to ensure that construction projects do not result in water quality impacts in regions outside of USACE jurisdiction, Mitigation Measure 3.7-2 has been modified as follows:

Mitigation Measure 3.7-2: The implementing agencies shall develop and implement a ~~SWPPP using~~ BMPs to minimize erosion and sedimentation. The implementing agencies shall include in contractor specifications that the contractor is responsible for developing and implementing the BMPs ~~the SWPPP~~. The BMPs ~~SWPPP~~ shall be maintained at the site for the entire duration of construction.

The objectives of the BMPs ~~SWPPP~~ are to identify pollutant sources that may affect the quality of storm water discharge and to implement measures ~~BMPs~~ to reduce pollutants in storm water discharges. The BMPs ~~SWPPP~~ for the proposed project shall include, but not be limited to, the implementation of the following elements:

- Identification of all pollutant sources, including sources of sediment that may affect the quality of storm water discharges associated with construction activity from the construction site;
- Identification of non-storm water discharges;
- Estimate of the construction area and impervious surface area;
- Preparation of a site map and maintenance schedule for BMPs installed during construction designed to reduce or eliminate pollutants after construction is completed (post-construction BMPs);
- Identification of all applicable erosion and sedimentation control measures, waste management practices, and spill prevention and control measures;
- Maintenance and training practices; and,
- A sampling and analysis strategy and sampling schedule for discharges from construction activities.

Comment RCSD-18

The comment requests that page ES-21 of the Executive Summary be modified.

Response RCSD-18

The Impact Statement 3.8-2 in the Executive Summary on page ES-21 was incorrect and did not match the statement for Impact 3.8-2 in Chapter 3.8. Table ES-1 in the Executive Summary has been revised to correct this inconsistency.

In response to the comment, Mitigation Measure 3.8-1b has been modified as follows

Mitigation Measure 3.8-1b: Prior to conducting construction activities within an AIA, the implementing agencies shall prepare an airport construction safety plan that would identify best management practices. The plan would include, at a minimum, construction timeframes and hours, lighting and flagging requirements, air traffic control communication requirements, access and egress restrictions, equipment staging area requirements, and personal safety equipment requirements for construction workers, and appropriate notification to aviators. The plan would be reviewed and approved by airport staff and implemented by both the airport and project construction staff and FAA.

Comment RCSD-19

The comment requests that page ES-25 of the Executive Summary be modified.

Response RCSD-19

In response to the comment, the seventh bullet point in Mitigation Measure 3.11-1a has been modified as follows:

- Include a plan to coordinate all construction activities with the Antelope Valley Union High School District and Southern Kern Unified School District at least two months in advance. The Antelope Valley Union High School District and Southern Kern Unified School District shall be notified of the timing, location, and duration of construction activities. The implementing agencies shall require its contractor to maintain vehicle, pedestrian, and school bus service during construction through inclusion of such provisions in the construction contract. The assignment of temporary crossing guards at designated intersections may be needed to enhance pedestrian safety during project construction. Also the following provisions shall be met:
 - Pipeline construction near schools shall occur when school is not in session (i.e., summer or holiday breaks). If this is not feasible, a minimum of two months prior to project construction, the implementing agencies shall coordinate with the Antelope Valley Union High School District and Southern Kern Unified School District to identify peak circulation periods at schools along the alignment(s) (i.e., the arrival and departure of students), and require their contractor to avoid construction and lane closures during those periods;
 - A minimum of two months prior to project construction, the implementing agencies shall coordinate with the Antelope Valley Union High School District and Southern Kern Unified School District to identify alternatives to their Safe

Routes to School program, alternatives for the school busing routes and stop locations, and other circulation provisions, as part of the Traffic Control/Traffic Management Plan;

Comment RCSD-20

The comment requests that page ES-26 of the Executive Summary be modified.

Response RCSD-20

In response to the comment, Mitigation Measure 3.11-1f has been modified as follows

Mitigation Measure 3.11-1f: The implementing agencies shall consult with the Antelope Valley Transit Authority and the East Kern Regional Transit Express that connects to Lancaster at least one month prior to construction to coordinate bus stop relocations (if necessary) and to reduce potential interruption of transit service.

Comment RCSD-21

The comment requests that page ES-27 of the Executive Summary be modified.

Response RCSD-21

In response to the comment, Mitigation Measure 3.12-3 has been modified as follows

Mitigation Measure 3.12-3: During project design, LACWWD40, RCSD, and Kern County and the implementing agencies shall require the use of energy efficient equipment, including pumps and lighting. Project facility design and construction methods that produce less waste, or that produce waste that could more readily be recycled or reused shall be encouraged.

Comment RCSD-22

The comment requests that page ES-27 of the Executive Summary be modified.

Response RCSD-22

In response to the comment, Mitigation Measure 4-3 has been modified as follows

Mitigation Measure 4-3: The implementing agencies, shall communicate and coordinate project construction activities with other municipalities (e.g., Palmdale, Lancaster, and Rosamond CSD) and agencies (e.g., Caltrans, LA County DPW) in the Antelope Valley. Phasing of project construction shall be coordinated to minimize cumulative impacts to traffic and circulation.

Leona Valley Town Council, October 3, 2008

Comment LVTC-1

The comment expresses concern regarding the presence of prescription medications in recycled water and the effect they may have on the population over time as the concentrations increase.

The comment requests that this issue be addressed in the Final PEIR, in addition to Mitigation Measures 3.7-9 a, b, and c.

Response LVTC-1

The PEIR states on page 3.7-15 that recycled water may contain trace levels of pharmaceuticals and other potential water supply contaminants. Currently, there are no regulations or water quality objectives specifically for trace pharmaceuticals. The CDPH and RWQCBs regulate recycled water systems throughout the state. No evidence has been identified linking any public health risks associated with trace contaminants in recycled water applications. The quality of the recycled water produced at the water reclamation plants would be of sufficient quality for landscape irrigation and other industrial uses while being protective of public health. As stated on page 3.7-24 of the PEIR, recycled water use associated with the proposed project would comply with Title 22 of the California Code of Regulations. Recycled water provided by the LWRP, RWWTP, and PWRP would be treated to disinfected tertiary levels. The product recycled water may be used for the end use categories listed on Table 1-2 on page 1-16 of the PEIR.

Comment LVTC-2

The comment expresses concern regarding whether recharge water could migrate upstream and contaminate the groundwater in the Leona Valley.

Response LVTC-2

The proposed project includes groundwater recharge as a potential end use for recycled water. As stated on page 3.7-29 of the PEIR, the Water Recycling Criteria of Title 22 regulates the use of recycled water for groundwater and requires that groundwater recharge projects be regulated and approved on an individual case basis. Any potential groundwater recharge project using recycled water would be subject to strict regulatory reviews and additional, in-depth environmental assessment and documentation in accordance with CEQA prior to initiation of recharge activities. Implementation of pilot projects that include monitoring would be necessary to determine the impacts to existing groundwater quality. Mitigation Measures 3.7-9a through 3.7-9c on page 3.7-31 and 3.7-32 of the PEIR identify minimum requirements for future potential groundwater recharge projects in the project area.

Comment LVTC-3

The comment expresses concern about the location of proposed Reservoir 2 and its proximity to the San Andreas Fault.

Response LVTC-3

As shown in Figure 3.5-2 in the PEIR (page 3.5-4), Reservoir 2 is not located within the Alquist-Priolo Fault Zone for the San Andreas Fault. Alquist-Priolo Fault Zones are the areas around active faults where there is greater hazard due to fault rupture. Development is regulated in this zone to reduce the risk to humans and structures associated with seismic activity. Although Reservoir 2 is not in the Alquist-Priolo Fault Zone, it could be subject to intense ground shaking in the event of an earthquake. The PEIR includes Mitigation Measures 3.5-1 to ensure a site-

specific geotechnical investigation is conducted prior to the construction of Reservoir 2 and to ensure recommendations that result from this investigation are incorporated into the design specifications of Reservoir 2. Mitigation Measure 3.5-1 would minimize the risk of damage to facilities or the risk of structural failure due to surface rupture or intense ground shaking in the vicinity of Reservoir 2.

The PEIR provides a program-level analysis of the environmental impacts of constructing and operating the proposed storage reservoirs. When the location and design for Reservoir 2 are further refined, additional CEQA documentation will be prepared prior to construction of this reservoir. Subsequent CEQA documentation will include analyses that reflect the data and conclusions from the site-specific geotechnical investigation. LACWWD40 and/or the implementing agencies would develop additional, feasible mitigation, if necessary, to further reduce impacts due to seismic hazards to less than significant levels.

Antelope Acres Town Council, October 6, 2008

Comment AATC-1

The comment expresses concern regarding whether chloramines that AVEK puts in the water will still exist after treatment. The comment requests an explanation of the short and long term effects that the presence of chloramines would have on the following areas: agriculture, water banking, wildlife, domestic animals, road asphalt from street sweeping, and commercial plants.

Response AATC-1

Though chloramine is part of the potable water treatment process, it is not part of the recycled water treatment process and therefore would not be present in the recycled water produced by the LWRP, PWRP, and RWWTP. The quality of the recycled water produced at the water reclamation plants would be of sufficient quality to protect public health. As stated on page 3.7-24 of the PEIR, recycled water use associated with the proposed project would comply with Title 22 of the California Code of Regulations. Recycled water provided by the LWRP, RWWTP, and PWRP would be treated to disinfected tertiary levels. As such, the product recycled water may be used for all of the end use categories listed on Table 1-2 on page 1-16 of the PEIR.

Pat Moriarty, October 2, 2008

Comment PM-1

The comment expresses concern regarding the presence of chemicals such as pharmaceutical drugs and chloramine in the recycled water.

Response PM-1

Though chloramine is part of the potable water treatment process, it is not part of the recycled water treatment process and therefore would not be present in the recycled water produced by the LWRP, PWRP, and RWWTP. The quality of the recycled water produced at the water

reclamation plants would be of sufficient quality to protect public health. As stated on page 3.7-24 of the PEIR, recycled water use associated with the proposed project would comply with Title 22 of the California Code of Regulations. Recycled water provided by the LWRP, RWWTP, and PWRP would be treated to disinfected tertiary levels. As such, the product recycled water may be used for all of the end use categories listed on Table 1-2 on page 1-16 of the PEIR.

The proposed project includes groundwater recharge as a potential end use for recycled water. As stated on page 3.7-30 of the PEIR, the Water Recycling Criteria of Title 22 regulates the use of recycled water for groundwater and requires that groundwater recharge projects be regulated and approved on an individual case basis. Any potential groundwater recharge project using recycled water would be subject to strict regulatory reviews and additional, in-depth environmental assessment and documentation in accordance with CEQA prior to initiation of recharge activities. Implementation of pilot projects that include monitoring would be necessary to determine the impacts to existing groundwater quality. Mitigation Measures 3.7-9a through 3.7-9c on page 3.7-31 and 3.7-32 of the PEIR identify minimum requirements for future potential groundwater recharge projects in the project area.

Dean Webb, September 24, 2008

Comment DW-1

The comment expresses concern over the potential for the recycled water demand to impact to Piute Ponds.

Response DW-1

The proposed project would have no impact on the management of the Piute Ponds. The LACSD Lancaster WRP 2020 Facilities Plan adopted by the LACSD in 2004 provided minimum flow requirements to maintain the ponds for habitat value. LACSD manages the ponds in coordination with CDFG and EAFB. The Antelope Valley Regional Recycled Water Project would not affect the LACSD's obligation to maintain the ponds for habitat value.

James Gilley, September 15, 2008

Comment JG-1

The comment expresses concern that the requirement for a general plan amendment or conditional use permit for construction of water recharge facilities is an unnecessarily expensive and time-consuming mitigation measure since all the responsible agencies already have Director Review, Site Plan Review, or similar entitlement processes that could be followed.

Response JG-1

As stated in Mitigation Measure 3.8-3 on page 3.8-29 of the Draft PEIR, the implementing agency would only obtain a conditional use permit or a general plan amendment if it is deemed necessary by the appropriate jurisdiction.

City of Lancaster, October 7, 2008

Comment LAN-1

The comment expresses the City of Lancaster's support for the proposed project.

Response LAN-2

No response required.