

Appendix A

Notice of Preparation and Comments

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NOTICE OF PREPARATION

To: California Office of Planning and Research, Responsible Agencies, Trustee Agencies, and Other Interested Parties

From: The Metropolitan Water District of Southern California
Environmental Planning Section
700 North Alameda Street
Los Angeles, California 90012

Subject: Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings

Project: Pure Water Southern California

Lead Agency: The Metropolitan Water District of Southern California

Review Period: September 30, 2022, to November 14, 2022

Pure Water Southern California (formerly called the Regional Recycled Water Program) is a proposed partnership between The Metropolitan Water District of Southern California (Metropolitan) and the Los Angeles County Sanitation Districts (Sanitation Districts) to beneficially reuse cleaned wastewater that currently is being discharged to the Pacific Ocean from the Sanitation Districts' Joint Water Pollution Control Plant (JWPCP) in the city of Carson. The cleaned wastewater would be purified through a new Advanced Water Purification facility constructed on undeveloped property within the JWPCP to produce approximately 150 million gallons per day of purified water. This purified water would then be transported via new conveyance facilities as far north as the city of Azusa and as far east as the city of Upland to new or existing water distribution facilities. The purified water could be used to recharge the West Coast, Central, Main San Gabriel, and Orange County groundwater basins through spreading facilities and injection wells and to augment water supplies at water treatment plants owned and operated by Metropolitan in the cities of La Verne and Yorba Linda, by the Three Valleys Municipal Water District in the city of Claremont, and/or by the Inland Empire Utilities Agency in the city of Upland.

Pure Water Southern California facilities would be located primarily within Los Angeles County, with some facilities possibly extending into western San Bernardino County. However, the potential recipients of purified water generated and delivered by these facilities are spread over a much wider geographic area. At project completion, Pure Water Southern California would provide nearly 155,000 acre-feet per year of sustainable, high-quality water to supplement existing supplies in the Southern California region.

Attachment A to this Notice of Preparation (NOP) contains: (1) an overview of Pure Water Southern California; (2) a description of its components, anticipated construction and operational activities, and phasing of work; (3) a summary of the probable environmental effects; and (4) the expected level of environmental analysis. Additional information regarding Pure Water Southern California can be found at: www.mwdh2o.com/purewater.

Notice of Preparation

This NOP has been prepared to inform federal, state, and local agencies; non-governmental organizations; members of the public; and other interested parties that Metropolitan, acting as the Lead Agency under the California Environmental Quality Act (CEQA), will prepare a Draft Environmental Impact Report (EIR) for Pure Water Southern California. Metropolitan is seeking input regarding the suggested scope and content of the EIR, including potential impacts, feasible mitigation measures, and reasonable alternatives.

Once certified, the EIR may be used by various public agencies in conjunction with their issuance of permits, approvals, or funding for Pure Water Southern California. To that end, this NOP is being sent to responsible, trustee, and other public agencies as part of the review process required under CEQA (Public Resources Code Section 21080.4) and the CEQA Guidelines (California Code of Regulations Section 15082). In addition to any comments on the scope and content of the EIR, Metropolitan requests that responsible and trustee agencies indicate their specific statutory responsibilities in connection with Pure Water Southern California.

Pure Water Southern California is considered a project of statewide, regional, or areawide significance (California Code of Regulations Section 15206(b)). Accordingly, Metropolitan will conduct formal scoping meetings for the EIR (California Code of Regulations Section 15082(c)) and will submit the Draft EIR to the State Clearinghouse and appropriate metropolitan council of governments for review and comment once completed (California Code of Regulations Section 15206(a)).

Submission of NOP Comments

Comments on this NOP should be submitted as soon as possible, **but no later than November 14, 2022**. Comments should include the name and mailing address and/or email address of a contact person. All parties who have submitted their names and contact information will be placed on the distribution list to receive the Notice of Availability of the Draft EIR. Comments may be submitted using any of the following methods:

Mail to:	Ms. Ana Reyes The Metropolitan Water District of Southern California Environmental Planning Section P.O. Box 54153 Los Angeles, CA 90054-0153
Email to:	EP@mwdh2o.com (reference "Pure Water Southern California" in the subject line)
Online comment portal:	Available at www.mwdh2o.com/purewatercomments
Virtual scoping meetings:	Currently scheduled for: October 12, 2022, 6 p.m. October 18, 2022, 12 noon October 27, 2022, 7 p.m. October 29, 2022, 10 a.m.

Please visit our website at www.mwdh2o.com/purewater for updated meeting information. Live translation in Spanish will be offered. Live translation to select other languages may be available upon request. Please e-mail your language needs to purewater@mwdh2o.com at least 72 hours prior to the meeting.

Community events:

Comment cards will be available at the Pure Water Southern California table at various community events. Please visit our website at www.mwdh2o.com/purewater for a list of events, dates, and locations.

Date: 9-27-2022

Signature: _____

Jennifer Harriger
Jennifer Harriger
Manager, Environmental Planning Section

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Attachment A

Pure Water Southern California

Notice of Preparation

BACKGROUND

The Metropolitan Water District of Southern California (Metropolitan) is a public agency made up of 26 member agencies serving 19 million people in the counties of Los Angeles, Orange, San Diego, Ventura, Riverside, and San Bernardino. Metropolitan imports water from the Colorado River via the Colorado River Aqueduct and from Northern California via the State Water Project to supplement local water supplies. In addition to importing water, Metropolitan supports its member agencies in developing local water conservation, recycling, storage, and resource management programs.

The Los Angeles County Sanitation Districts (Sanitation Districts) consist of 24 independent special districts that form a regional public agency that collects and treats wastewater for over 5.5 million people in Los Angeles County. The Sanitation Districts' Joint Water Pollution Control Plant (JWPCP) in the city of Carson is one of eleven wastewater treatment plants in their system and is one of the largest wastewater treatment plants in the world. The JWPCP provides primary and secondary treatment for approximately 260 million gallons per day (MGD) of wastewater, which currently is discharged to the Pacific Ocean.

Pure Water Southern California would be a partnership between Metropolitan and the Sanitation Districts to develop and implement a regional recycled water program. These agencies began exploring the concept for such a program in 2010, and since that time have conducted a number of preliminary evaluations and investigations. These have included a pilot study (2012), a feasibility study (2016), a conceptual planning study (2019), two white papers (2019 and 2020), an economic impact study (2021), and a variety of technical analyses of proposed system components and processes. In addition, construction of a 0.5-MGD demonstration-scale purification facility at the JWPCP was completed and began operations in October 2019. This facility is being used to evaluate treatment performance and to provide an opportunity for public outreach and education.

As the California Environmental Quality Act (CEQA) Lead Agency, Metropolitan is now in the scoping phase for preparation of an Environmental Impact Report (EIR) for Pure Water Southern California. This EIR will evaluate potential environmental impacts associated with construction and operation of Pure Water Southern California, as well as feasible mitigation measures and reasonable alternatives.

OVERVIEW OF PURE WATER SOUTHERN CALIFORNIA

If approved, Pure Water Southern California would create and distribute a new sustainable water supply by harvesting the region's largest untapped source of cleaned wastewater. This new water supply would help reduce the region's dependence on imported water and would assist the region in addressing disruption to imported water supplies. This purified water would not only provide a more diversified water supply to Southern California, it also would enhance Metropolitan's operational resilience, reliability, and flexibility in the face of ongoing challenges including long-term drought and climate change.

Specifically, Pure Water Southern California would involve purification of cleaned wastewater from the JWPCP at a new Advanced Water Purification (AWP) facility to produce approximately 150 MGD, or nearly 155,000 acre-feet per year, of sustainable, high-quality water predominantly for indirect and direct potable reuse.

Indirect potable reuse, or IPR, refers to the introduction of purified recycled water into an environmental buffer, such as a groundwater basin, where the purified water would naturally blend with groundwater before it is extracted and introduced into a water supply system. Purified water from Pure Water Southern California would be used for IPR purposes by discharging the water into groundwater basins via spreading facilities and injection wells. Groundwater recharge via spreading facilities could occur at the San Gabriel Canyon Spreading Grounds, Santa Fe Spreading Grounds, other recharge areas near the Santa Fe Dam, Rio Hondo Coastal Spreading Grounds, San Gabriel Coastal Spreading Grounds, and Orange County Groundwater Basin Spreading Grounds. Groundwater recharge via injection wells could occur in the West Coast Groundwater Basin near the city of Carson and the Central Groundwater Basin in the city of Long Beach.

Direct potable reuse, or DPR, refers to the introduction of purified recycled water into an existing water supply system without first passing the water through an environmental buffer. The purified water can either be blended with other water flows into an existing water treatment plant (WTP) for further treatment or distributed directly to the potable water system. Treatment of the purified water to DPR standards could occur at the AWP facility itself or at one or more offsite locations, including Metropolitan's F.E. Weymouth (Weymouth) WTP in the city of La Verne, a potential satellite facility to be located between the Santa Fe Dam area and the Weymouth WTP, the Three Valleys Municipal Water District Miramar WTP in the city of Claremont, or the Inland Empire Utilities Agency Agua de Lejos WTP in the city of Upland. The specific location(s) for DPR treatment would be selected with the aim of maximizing operational flexibility and optimizing distribution of water within Metropolitan's service area.

In addition to these applications, agencies such as the West Basin Municipal Water District and Los Angeles Department of Water and Power (LADWP) would be able to connect to the proposed conveyance facilities to serve industrial users. Furthermore, some water would be treated for irrigating parks and landscaping at or near the JWPCP.

Proposed facilities to implement Pure Water Southern California include modifications to the existing JWPCP, a new full-scale AWP facility located at the JWPCP, DPR treatment facilities, pipelines, pump stations, service connections, groundwater recharge improvements, and operation, maintenance, and ancillary facilities, as needed. The proposed facilities would potentially extend from the city of Carson in Los Angeles County to as far north as the city of Azusa and as far east as the city of Upland in western San Bernardino County. **Figure 1** shows the proposed project area and groundwater basins, as well as general locations for the major components associated with Pure Water Southern California, including treatment facilities, conveyance system, and groundwater recharge sites. **Figure 2** shows the specific location of the proposed AWP facility within the JWPCP site.

Construction and operation of Pure Water Southern California would require real property acquisitions in the form of temporary and permanent rights from public agencies, private utilities, and private landowners. Temporary rights such as temporary easements, leases, licenses, and permits would be required for temporary use of property for construction activities. Permanent rights, such as fee interests and permanent easements, would be required for the pipelines, pump stations, spreading facilities, and a potential satellite DPR facility.

DESCRIPTION OF COMPONENTS

Treatment Facilities

Pure Water Southern California would require construction and operation of various treatment facilities at the JWPCP. These would include modifications to the existing JWPCP treatment facilities, a new full-

scale AWP facility, and potentially a smaller facility to treat water for non-potable uses. In addition, facilities to further treat purified water from the AWP facility to DPR standards would be required. Potential locations for DPR treatment include the AWP facility; the Weymouth, Miramar, or Agua de Lejos WTPs; or a satellite facility, as described above.

In general, construction activities associated with all these treatment facilities would include site clearing; excavation; installation, upgrade, or relocation of utilities; installation of equipment, paving, landscaping, and associated site improvements; construction of buildings and other facilities; and storage of materials and equipment. Operational activities associated with these treatment facilities would include maintenance of facilities, structures, and equipment; storage of equipment and materials; delivery, storage, and management of treatment chemicals; and monitoring of water quality.

Proposed treatment facilities located at the JWPCP would be constructed on the Sanitation Districts' property bounded by West Lomita Boulevard to the south, South Main Street to the east, and developed portions of the JWPCP to the north and west. In addition to the construction activities described above, construction activities at this site also would include demolition of an existing Sanitation Districts' warehouse and maintenance basin; closure of existing oil wells; and modifications to or construction of new biological treatment processes. Construction is not anticipated to affect or interfere with ongoing operational activities at the JWPCP. In addition to the operational activities described above, this site also would support public tours and administrative services. Water residuals from each treatment process, except for reverse osmosis, would be re-routed back into the wastewater stream flowing into the JWPCP. Concentrate from the reverse osmosis process would be discharged to the Pacific Ocean via the existing JWPCP ocean outfall tunnels. No modifications to the existing outfall tunnels or their operations are proposed.

Proposed DPR treatment facilities at the Weymouth WTP would be located within the WTP boundaries south of Vera Cruz Street, west of Wheeler Avenue, north of Highland Drive, and east of Sedalia Avenue and Moreno Avenue in the city of La Verne. The location of the proposed DPR treatment facilities at Miramar and Agua de Lejos WTPs would be determined by their respective agencies. The Miramar WTP is located south of Alamosa Drive, west of San Antonio Creek, north of East Miramar Avenue, and east of Padua Avenue in the city of Claremont. The Agua de Lejos WTP is located south of West 18th Street, west of North Benson Avenue, north of West 17th Street, and southeast of State Route 210 in the city of Upland. The potential satellite DPR facility would be located between the Santa Fe Dam area and the Weymouth WTP at a location to be determined.

Conveyance System

The conveyance system would be comprised of two pipelines – the backbone pipeline and the DPR pipeline – and at least five associated pump stations. The backbone pipeline would consist of a 7-foot-diameter pipe and would extend approximately 42 miles from the AWP facility to the existing San Gabriel Canyon Spreading Grounds in the city of Azusa. The backbone pipeline would potentially pass through the cities of Carson, Long Beach, Lakewood, Cerritos, Bellflower, Norwalk, Downey, Santa Fe Springs, Duarte, Pico Rivera, Industry, El Monte, Baldwin Park, Irwindale, and Azusa, as well as unincorporated portions of Los Angeles County. The pipeline would be buried under public roadways and in rights-of-way situated along the San Gabriel River that currently are held by Southern California Edison, LADWP, Los Angeles County Flood Control District, U.S. Army Corps of Engineers, and private parties. The backbone pipeline would have the capacity to convey approximately 150 MGD of purified water and would deliver this water for various purposes along the alignment, including IPR, DPR, and industrial applications.

Three proposed pump stations would pump water along the backbone pipeline from the AWP facility uphill to the San Gabriel Canyon Spreading Grounds. One pump station would be located on the same site as the AWP facility; a second pump station would be located near Whittier Narrows in the city of Industry, city of Pico Rivera or Los Angeles County depending on site selection; and a third would be located near the Santa Fe Spreading Grounds in the city of Irwindale or city of Baldwin Park. Although the sites for the latter two pump stations have not yet been specifically identified, they would be located adjacent to the backbone pipeline.

A separate DPR pipeline would convey purified water approximately 12 miles eastward from the Santa Fe Dam area or San Gabriel Canyon Spreading Grounds area to the Weymouth WTP. Potential alignments under consideration for the DPR pipeline follow existing roadways through the cities of Azusa, Baldwin Park, Irwindale, Glendora, Covina, West Covina, San Dimas, and La Verne, as well as unincorporated portions of Los Angeles County. The San Gabriel Valley Municipal Water District's existing Devil Canyon-Azusa Pipeline (Azusa Pipeline) could potentially be used to convey up to approximately 25 MGD of purified water to the Weymouth WTP; however, its limited capacity would not meet DPR treatment goals. Therefore, while the Azusa Pipeline could be used on an interim basis, Metropolitan proposes to ultimately construct a new DPR pipeline. At least two new pump stations would be required along the DPR Pipeline and/or Azusa Pipeline to pump the water eastward towards the Weymouth WTP. The Azusa Pipeline may also be used to convey water further east to the Miramar WTP and the Agua De Lejos WTP, which would require at least two additional pump stations along the Azusa Pipeline. Pump station locations would be determined at a later time.

Construction activities for the pipelines would be temporary in nature and would utilize a variety of methods based on the characteristics of each portion of the alignment. These methods would include trench excavation and backfill, as well as several different trenchless methods. To the extent feasible, trenchless methods would be used to minimize impacts to the San Gabriel River, major drainage channels, the transportation system, sensitive resources, and areas with limited rights-of-way. Construction activities associated with the pump stations also would be temporary and would include site clearing and grading, excavation, utility construction and/or relocation, installation of pumps and associated infrastructure, construction of buildings, paving, and fencing.

Temporary construction staging and storage areas would be required along the alignments to support these construction activities. The staging and storage areas would have various uses, but generally would include installation of construction trailers, temporary utility connections, equipment and materials storage, and construction employee parking. To the extent feasible, previously disturbed sites would be selected based on availability during final design or at the time that construction is ready to proceed. Site preparation for the staging and storage areas would include clearing and grading, minor excavation for utility connections, fencing, and possible gravel placement.

Operational activities for the pipelines and pump stations would be minimal and would include operating and maintaining the pump stations, patrolling the pipeline, maintaining patrol roads and facilities, securing the pump stations and other structures, periodically dewatering the pipeline for inspections/testing, and conducting repairs as needed.

Groundwater Recharge and Service Connections

Metropolitan would provide metered service connections at various locations along the backbone and DPR pipelines to enable agencies to obtain water for industrial, groundwater recharge, and DPR uses. Smaller diameter lateral pipelines to connect the meters to new or existing facilities, as well as to provide non-potable water at and near the JWPCP, would be developed, constructed, and managed by these agencies.

Construction activities related to groundwater recharge are anticipated to include improvements to existing spreading facilities, construction of new spreading facilities, installation of new injection wells, relocation of existing production wells, and installation of service connections to these facilities. Construction activities associated with service connections for industrial and DPR uses would include installation of smaller distribution pipelines and ancillary facilities from the backbone and DPR pipelines.

Operational activities for these facilities would include releasing purified water into and maintaining spreading facilities, injecting purified water into groundwater basins, maintaining and operating injection and production wells, and inspecting, maintaining, and operating service connections and pipelines.

Phasing

Construction and operation of Pure Water Southern California are expected to occur in two phases. To augment regional water supplies in the near term, an early delivery component as part of Phase 1 is proposed to start construction in 2025 and be operational in 2028. During this early delivery component, facilities to treat and pump up to 30 MGD at the JWPCP and approximately seven miles of the backbone pipeline through the city of Carson would be simultaneously constructed. Construction of this portion of the backbone pipeline would enable service connections to deliver purified water for industrial and groundwater recharge uses, as well as to the Sanitation Districts for non-potable uses.

Upon completion of the early delivery component, construction of Phase 1 would continue at the AWP facility to produce approximately 100 MGD of purified water, and the remainder of the backbone pipeline and associated pump stations would also be completed. Phase 1 is anticipated to be complete by late 2032. For DPR purposes, it is currently anticipated that the Azusa Pipeline would be used to convey purified water from the backbone pipeline to the Weymouth WTP on either an interim or permanent basis, which would require the construction of new pump stations, interconnecting pipelines, and control structures and potential improvement of appurtenance facilities along the Azusa Pipeline. Phase 1 also could include the construction of a new DPR treatment facility at the Weymouth WTP on either an interim or permanent basis, as well as groundwater recharge improvements, new service connections, and lateral pipelines.

Phase 2 would involve expansion of the AWP facility to purify up to a total of 150 MGD. Phase 2 also would include construction of DPR treatment facilities at the AWP facility, at a satellite DPR site, or at one or more WTPs, as well as the DPR pipeline that extends eastward from the backbone pipeline. Although the timing of this phase is uncertain, it is assumed for the purposes of this environmental analysis that construction would start in 2033 and that Pure Water Southern California would be complete and fully operational in 2036.

PROBABLE ENVIRONMENTAL EFFECTS

In accordance with Section 15126 of the CEQA Guidelines, the EIR will assess the significant environmental effects of Pure Water Southern California, including direct, indirect, cumulative, and growth-inducing effects. Due to the size and scope of this undertaking, Metropolitan committed to preparing an EIR from the outset and, accordingly, did not prepare an initial study. As such, the EIR will address the full suite of resource categories contained in Appendix G of the CEQA Guidelines.

Probable environmental effects associated with Pure Water Southern California include:

- Air Quality: due to operation of heavy equipment, vehicular use, demolition of facilities, materials delivery, grading, excavation, and hauling during construction, as well as water treatment activities, pumping, and vehicular use during operations

- Biological Resources: due to grading, excavation, and noise during construction
- Cultural Resources: due to grading and excavation activities during construction
- Energy: due to heavy equipment and vehicular use during construction, as well as water treatment activities, pumping, and vehicular use during operations
- Geology/Soils: due to grading and excavation activities
- Greenhouse Gas Emissions: due to heavy equipment and vehicular use during construction, as well as water treatment activities, pumping, and vehicular use during operations
- Hazards and Hazardous Materials: due to the potential to encounter existing contamination during construction and the transport and handling of hazardous materials for water treatment operations
- Hydrology/Water Quality: due to grading, excavation, and materials storage associated with construction, as well as long-term impacts due to new impervious surfaces
- Land Use/Planning: due to potential conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects
- Noise: due to operation of heavy equipment and vehicles, demolition of facilities, materials delivery, and hauling during construction, as well as activities associated with water treatment facilities, pumping, and vehicular use during operations
- Transportation: due to construction worker and equipment travel, hauling of material, and potential re-routing of traffic to avoid construction areas within roadways, as well as traffic generated during operations of water treatment facilities
- Tribal Cultural Resources: due to grading and excavation activities during construction
- Utilities/Service Systems: due to relocation of existing utilities and generation of solid waste during construction

In addition to providing a detailed analysis of potential impacts in each of these resource categories, the EIR will identify feasible mitigation measures and/or a reasonable range of alternatives that could avoid or reduce any significant impacts, as applicable.

Pure Water Southern California is not anticipated to have any potentially significant environmental impacts in the following resource categories: Aesthetics; Agriculture and Forestry Resources; Mineral Resources; Population and Housing; Public Services; Recreation; and Wildfire. While these resource categories will be examined in the EIR, the level of analysis is not anticipated to be as detailed as for the other resource categories noted above.

EXPECTED LEVEL OF ANALYSIS

Design information for Pure Water Southern California currently exists at a varying level of detail. As such, it is anticipated that the EIR will provide both program-level and project-level analyses depending on the nature and scope of information available for each component. In general, the AWP facility (including the associated pump station and potential DPR treatment facilities), JWPCP modifications, and backbone pipeline are anticipated to be analyzed at the project level since sufficient design and technical information already exist.

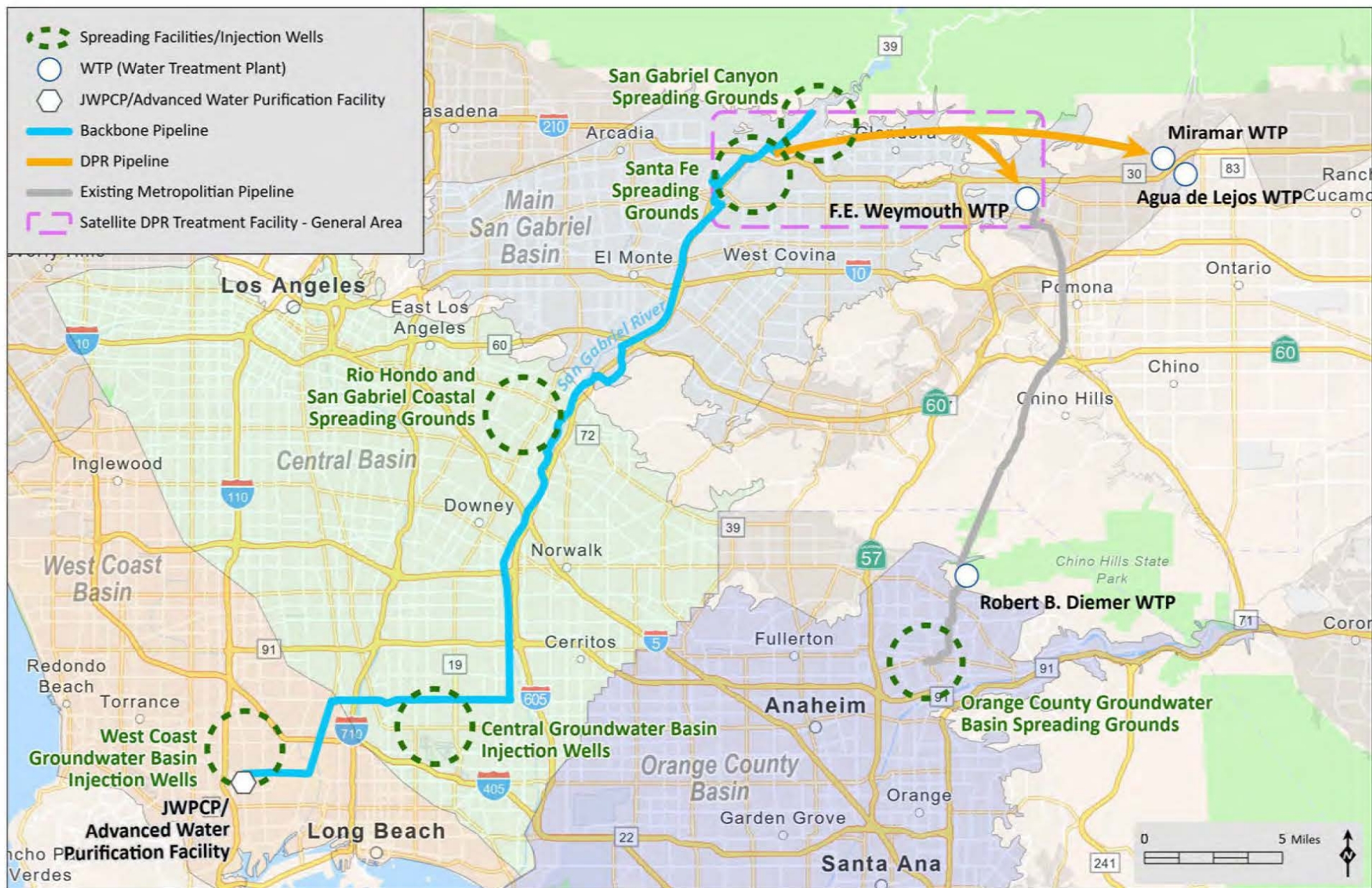
Information also is available regarding the anticipated operational equipment for all pump stations along the backbone pipeline. Accordingly, impacts associated with air quality, greenhouse gas emissions, and energy demand can be evaluated at a project level. However, the locations of two of the three

pump stations have not yet been determined. Therefore, site-specific impacts from these facilities may require subsequent environmental review.

Lastly, at present there is only conceptual-level information available for the potential DPR-related treatment facilities at the Weymouth WTP, Miramar WTP, Agua de Lejos WTP, and the satellite facility; DPR pipeline and associated pump stations; the groundwater recharge facilities; and the various service connections. Accordingly, these components are anticipated to be analyzed only at the program level in this EIR.

Once certified, Metropolitan and other public agencies will consider and rely on the information in this EIR prior to taking any discretionary action with respect to Pure Water Southern California, such as issuing approvals, permits, or licenses; entering into contracts or agreements; or providing grants, loans, or other forms of financial assistance. In doing so, these agencies will determine whether the potential environmental impacts associated with that discretionary action already were addressed in the certified EIR or, alternatively, whether additional environmental review and analysis are required. The nature and scope of any additional review and analysis will be determined in accordance with the criteria set forth in CEQA Guidelines Sections 15162, 15163, and 15164.

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PUREWATER
SOUTHERN CALIFORNIA

Project Area

Figure 1



Source: Base Map Layer (Esri)



PUREWATER
SOUTHERN CALIFORNIA

JWPCP/Advanced Water Purification Facility

Figure 2

State Agencies



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

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



SENT BY EMAIL ONLY

November 14, 2022

Ana Reyes
The Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, CA 90054-0153
EP@mwdh20.com

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Pure Water Southern California Project, SCH #2022090654, The Metropolitan Water District of Southern California, Los Angeles County

Dear Ms. Reyes:

The California Department of Fish and Wildlife (CDFW) has reviewed a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the Metropolitan Water District of Southern California (MWD) for the Pure Water Southern California Project (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on Projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code,

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§ 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Project Description and Summary

Objective: The proposed Project is a multi-agency partnership between MWD and Los Angeles County Sanitation Districts to develop and implement a regional recycled water program. The Project intends to create and redistribute water supply by harvesting cleaned wastewater. The Project includes the construction of treatment facilities on undeveloped lots, the installation of 54 miles of pipeline under existing roadways and rights-of-ways along the San Gabriel River, and other service systems connecting pipelines to existing groundwater recharge systems.

Specifically, the Project proposes purifying cleaned wastewater from the Joint Water Pollution Control Plant (JWPCP) at a new Advanced Water Purification (AWP) facility to produce approximately 150 million gallons per day of water for indirect and direct potable reuse (IPR and DPR). IPR introduces the purified water into an environmental buffer, such as groundwater basins via spreading facilities and injection wells. DPR introduces the purified water into an existing water supply system via water treatment plants or directly into the potable water system. The proposed Project activities include the following:

Treatment Facilities

- Modify and upgrade existing JWPCP treatment facilities.
- Construct new AWP facility and potentially an additional purification facility.
- Demolish existing Sanitation District's warehouse and maintenance basin.

Conveyance Systems

- Install approximately 42 miles of 7-foot diameter pipe and at least five new pump stations from the new AWP facility to the existing San Gabriel Canyon Spreading Grounds.
- Install approximately 12 miles of 7-foot diameter pipe and two new pump stations to convey water from the San Gabriel Spreading Grounds to the Weymouth Water Treatment Plant.

Groundwater Recharge and Service Connections

- Install smaller diameter lateral pipelines to connect meters to new or existing facilities.
- Upgrade and install spreading facilities.
- Install and relocate injection wells.

Location: The proposed Project facilities will potentially extend from the City of Carson in Los Angeles County to as far north as the City of Azusa and as far east as the City of Upland in western San Bernardino County. The proposed AWP facility will be located at 24501 S Figueroa Street, Carson, CA 90745 adjacent to the existing JWPCP. The proposed conveyance systems will potentially pass through the cities of Carson, Long Beach, Lakewood, Cerritos, Bellflower, Norwalk, Downey, Santa Fe Springs, Duarte, Pico Rivera, Industry, El Monte, Baldwin Park, Irwindale, Azusa, Glendora, Covina, West Covina, San Dimas, and La Verne. The Project provides program-level planning for the remaining components and does not include site-specific locations.

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Comments and Recommendations

CDFW offers the comments and recommendations below to assist the MWD in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. The DEIR should provide adequate and complete disclosure of the Project's potential impacts on biological resources [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003(i), 15151]. CDFW looks forward to commenting on the DEIR when it is available.

Specific Comments

- 1) Impacts on Flow and Biological Resources. The Project intends to redistribute wastewater that is currently being discharged into tributaries to the Pacific Ocean. The Project could reduce discharge from the JWPCP by approximately 150 million gallons per day and affect water availability and flows downstream. As such, CDFW recommends the DEIR disclose how the Project may modify the current flow regime and potentially impact fish and wildlife resources downstream of the JWPCP. The DEIR should include:
 - a) An analysis of the existing flow regime during the winter and summer seasons, and how that may change under Project conditions;
 - b) An analysis of potential Project-related effects on river hydraulics. This includes water depth (Percent change), wetted perimeter (acres gained/lost), and velocity (percent change);
 - c) A comprehensive list of sensitive and special status plant and wildlife species and sensitive plant communities occurring in downstream [habitat/communities]; and
 - d) A discussion as to how each species or plant community may be significantly impacted directly or indirectly through habitat modification, as result of changes to hydrology (reduced flow) and hydraulics (water depth, wetted perimeter, velocity).
- 2) Stream Delineation and Impact Assessment. Project activities intend to install and maintain new pipelines and associated facilities to convey cleaned wastewater. Project activities may impact streams and associated natural communities as a result of grading, trenching, and development along the San Gabriel River. Moreover, the Project could modify the bed, channel, or bank habitat downstream of the JWPCP by potentially modifying the current flow regime.
 - a) Analysis and Disclosure. In preparation of the DEIR, CDFW recommends the DEIR include a stream delineation and evaluation of impacts on any river, stream, or lake. The delineation should be conducted pursuant to the USFWS wetland definition adopted by CDFW (*Cowardin et al.* 1979). The DEIR should discuss the Project's impact on streams, rivers, or lakes, including impacts on associated natural communities. Impacts may include channelizing or diverting streams, impairing a watercourse, and removing or degrading vegetation through habitat modification (e.g., loss of water source, loss of substrate, encroachment, and edge effects leading to introduction of non-native plants).
 - b) Avoidance and Setbacks. CDFW recommends the Project avoid impacts on streams and associated natural communities by avoiding or minimizing Project-related construction adjacent to the San Gabriel River. Herbaceous vegetation adjacent to streams protects the physical and ecological integrity of these water features and maintains natural sedimentation processes. The Project should be designed with effective setbacks from

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streams and associated natural communities. Where the Project would occur near streams, but would avoid impacts on streams, the DEIR should provide a justification as to why a proposed setback distance would be effective to avoid impacts on the stream and associated vegetation.

- c) Mitigation. If avoidance is not feasible, the DEIR should include measures to fully compensate for impacts on streams and loss of associated natural communities. Higher mitigation should be provided to compensate for impacts on streams supporting rare, sensitive, or special status fish, wildlife, and natural communities.
 - d) Fish and Game Code Section 1602. CDFW exercises its regulatory authority as provided by Fish and Game Code section 1600 et seq. to conserve fish and wildlife resources which includes rivers, streams, or lakes and associated natural communities. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream or use material from a streambed. For any such activities, the project applicant (or "entity") must notify CDFW. Accordingly, if the Project would impact streams, the DEIR should include measures to notify CDFW pursuant to Fish and Game Code section 1602 prior to starting activities that may impact streams. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for more information (CDFWa 2022).
- 3) Sensitive Natural Communities. A qualified biologist should map all natural communities with the Project site as well as areas subject to off-site impacts with established protocol (as described in General Comment 1). The qualified biologist should identify and map natural communities including, but not limited to, the following: California walnut groves (*Juglans californica* Alliance); California sycamore woodlands (*Platanus racemosa* Alliance); Fremont cottonwood forest and woodland (*Populus fremontii* Alliance); oak forest and woodland (*Quercus* genus Alliance); and willow riparian woodland and forest (*Salix* genus Alliance).
- The DEIR should fully disclose where impacts would occur and how many acres of natural communities would be impacted. The DEIR should be conditioned to provide compensatory mitigation for impacts on Sensitive Natural Communities. Due to the local/regional rarity and significance, compensatory mitigation should be higher for impacts on Sensitive Natural Communities with a State Rarity Ranking of S1 or S2 and/or a Sensitive Natural Community with an additional ranking of 0.1 or 0.2.
- 4) Impacts to Sensitive Species. The proposed Project activities may take place within the floodplain and active channel of the San Gabriel River. CDFW is concerned the Project may affect sensitive species that occur within this watershed and areas adjacent to the Project. Areas of particular concern include reaches near the Santa Fe Dam, Whittier Narrows Natural Area, and the San Jose Creek confluence with the San Gabriel River. Least Bell's vireo (*Vireo bellii pusillus*; CDFWb 2022), southwestern willow flycatcher (*Empidonax traillii extimus*), and coastal California gnatcatcher (*Polioptila californica californica*) have been documented as occurring in these areas. Least Bell's vireo and southwestern willow flycatcher are protected as endangered species under both CESA and the federal Endangered Species Act (ESA). Coastal California gnatcatcher is protected by ESA and listed as a California Species of Special Concern. Other California Species of Special concern that may occur within or near the Project location include but are not limited to burrowing owl (*Athene cunicularia*), American badger (*Taxidea taxus*), big free-tailed bat

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(*Nyctinomops macrotis*), hoary bat (*Lasiurus cinereus*), pallid bat (*Antrozous pallidus*), coast range newt (*Taricha torosa*), western spadefoot (*Spea hammondi*), western pond turtle (*Emys marmorata*), coast horned lizard (*Phrynosoma blainvilli*), and southern California legless lizard (*Anniella stebbinsi*). Rare plants that may occur within or near the Project location include but are not limited to Parry's spineflower (*Chorizanthe parryi* var. *parryi*), mesa horkelia (*Horkelia cuneata* var. *puberula*), and Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*). Grading, trenching, vegetation removal, and other ground disturbances could crush and bury listed or sensitive plants and animals, resulting in direct mortality. The Project may also affect adjacent habitat by creating loud noises, lighting, increased human presence and activity, fugitive dust, and spreading invasive weeds, resulting in stress, displacement, and mortality of these species. CDFW recommends the following:

- a) California Endangered Species Act. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or CESA-listed plant species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project or any Project-related activity will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate take authorization under CESA may include an Incidental Take Permit (ITP) among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. To obtain appropriate take authorization under CESA, early consultation with CDFW is encouraged, as significant modification to a project and mitigation measures may be required to obtain a CESA permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project's CEQA document addresses all Project impacts on CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
 - b) Avoidance, Minimization, and Mitigation for Sensitive Plants. The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts. CDFW considers these communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S1, S2, S3, and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the California Natural Diversity Database (CNDDB) and can be obtained by visiting the [Vegetation Classification and Mapping Program – Natural Communities](#) webpage (CDFWc 2022).
- 5) Impacts to Bats. Bats have the potential to forage and roost in structures, trees, and natural areas throughout the Project site. Bats and roost may be impacted by removal of trees, vegetation, and/or structures supporting roosting bats. Bats and roosts may also be adversely impacted by increased noise, human activity, dust, and ground vibration.
- a) Protection Status. Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs., § 251.1). In addition, some bats are considered a California Species of Special Concern

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(SSC). CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065).

- b) Analysis and Disclosure. CDFW recommends the DEIR should discuss the Project's potential impact on bats and habitat supporting roosting bats. A discussion of potential impacts should include impacts that may occur during building demolition, ground-disturbing activities, and vegetation removal.
 - c) Surveys. In preparation of the DEIR, CDFW recommends MWD retain a qualified bat specialist identify potential daytime, nighttime, wintering, and hibernation roost sites and conduct bat surveys within these areas (plus a 100-foot buffer as access allows) to identify roosting bats and any maternity roosts. CDFW recommends using acoustic recognition technology to maximize detection of bats. Positive detections of bats and roost locations should be mapped, and a summary report should be disclosed in the DEIR.
- 6) Impacts to Nesting Birds. The Project proposes to develop within or adjacent to riparian habitat and other natural areas that likely support nesting birds and raptors. The proposed Project may impact nesting birds through grading activities and the removal of vegetation and trees. Furthermore, Project activities occurring during the nesting bird season, especially in areas providing suitable nesting habitat, could result in the incidental loss of fertile eggs or nestlings, or nest abandonment.
- a) Protection Status. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor.
 - b) Analysis and Disclosure. CDFW recommends the DEIR discuss the Project's potential impact on nesting birds and raptors within the Project site. A discussion of potential impacts should include impacts that may occur during ground-disturbing activities and vegetation removal. The DEIR should analyze and discuss the Project's impact on bird and raptor nesting and breeding habitat. Edge effects and temporal loss should also be analyzed and discussed. The DEIR should also disclose the acreage of bird and raptor nesting and breeding habitat that could be impacted and lost as a result of the proposed Project.
 - c) Avoidance. CDFW recommends the DEIR include a measure to fully avoid impacts to nesting birds and raptors. To the extent feasible, no construction, ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating), and vegetation removal during the avian breeding season which generally runs from February 15 through September 15 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs.

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If impacts to nesting birds and raptors cannot be avoided, CDFW recommends the DEIR include measures to minimize impacts on nesting birds and raptors. Prior to starting ground-disturbing activities and vegetation removal, a qualified biologist should conduct nesting bird and raptor surveys to identify nests. The qualified biologist should establish no-disturbance buffers to minimize impacts on those nests. CDFW recommends a minimum 300-foot no disturbance buffer around active bird nests. For raptors, the no disturbance buffer should be expanded to 500 feet and 0.5 mile for special status species, if feasible. Personnel working on the Project, including all contractors working on site, should be instructed on the presence of nesting birds, area sensitivity, and adherence to no-disturbance buffers. Reductions in the buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors determined by a qualified biologist.

- 7) Landscaping. The proposed Project involves landscaping activities that entail removal and replacement of vegetation and trees. CDFW recommends MWD only use native species found in naturally occurring vegetation communities within or adjacent to the Project site. The proposed Project should not plant, seed, or otherwise introduce non-native, invasive plant species to areas that are adjacent to and/or near native habitat areas. Accordingly, CDFW recommends MWD restrict use of any species, particularly 'Moderate' or 'High' listed by the [California Invasive Plant Council](#) (Cal-IPC 2022). These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.

General Comments

- 1) Biological Baseline Assessment. The DEIR should provide an adequate biological resources assessment, including a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site and where the Project may result in ground disturbance. The assessment and analysis should place emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project site. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. An environmental document should include the following information:
 - a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFWc 2022);

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- b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where Project construction and activities could lead to direct or indirect impacts off site;
 - c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at a Project site and within the neighboring vicinity. The [Manual of California Vegetation](#) (MCV), second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2009). Adjoining habitat areas should be included in this assessment the Project could lead to direct or indirect impacts off site. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
 - d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by a Project. California Natural Diversity Database in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. An assessment should include a nine-quadrangle search of the CNDDDB to determine a list of species potentially present at a Project site. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur in the Project site. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];
 - e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of a Project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's [Survey and Monitoring Protocols and Guidelines](#) for established survey protocol for select species (CDFWd 2022). Acceptable species-specific survey procedures may be developed in consultation with CDFW and the USFWS; and
 - f) A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of a proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame or in phases.
- 2) Biological Direct, Indirect, and Cumulative Impacts. The Project proposes to divert CDFW recommends providing a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The DEIR should address the following:

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- a) A discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)]. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;
 - b) A discussion of both the short-term and long-term effects to species population distribution and concentration and alterations of the ecosystem supporting the species impacted [CEQA Guidelines, § 15126.2(a)];
 - c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures;
 - d) A discussion of Project-related changes on drainage patterns; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project sites. The discussion should also address the potential water extraction activities and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included;
 - e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR; and
 - f) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant and wildlife species, habitat, and vegetation communities. If MWD determines that the Project would not have a cumulative impact, the DEIR should indicate why the cumulative impact is not significant. MWD's conclusion should be supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].
- 3) Disclosure. A DEIR should provide an adequate, complete, and detailed disclosure about the effect which a proposed Project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, §15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).
- 4) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental document "shall describe feasible measures which could mitigate for impacts below a significant level under CEQA."

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- a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the Lead Agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4). A public agency “shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures” (Pub. Resources Code, § 21081.6). CDFW recommends MWD provide mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). Adequate disclosure is necessary so CDFW may provide comments on the adequacy and feasibility of proposed mitigation measures.
 - b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the Project as proposed, the DEIR should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the DEIR should provide an adequate, complete, and detailed disclosure about a project’s proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.
- 5) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting [CNDDB Field Survey Forms](#) (CDFWe 2022). MWD should ensure data collected for the preparation of the DEIR be properly submitted, with all data fields applicable filled out. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred.
- 6) Compensatory Mitigation. The DEIR should include mitigation measures for adverse Project-related direct or indirect impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code, section 65967, the Lead Agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.
- 7) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, a DEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased

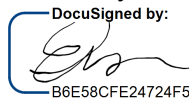
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human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.

Conclusion

We appreciate the opportunity to comment on the NOP for the Pure Water Southern California Project to assist the MWD in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Nicole Leatherman, Environmental Scientist, at Nicole.Leamer@wildlife.ca.gov or (858) 761-8020.

Sincerely,

DocuSigned by:

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Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

cc: CDFW

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OPR

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References:

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California Department of Transportation

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October 19, 2022

Ana Reyes
Senior Environmental Scientist
The Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, CA 90054-0153
EP@mwdh2o.com

RE: Pure Water Southern
California Project (NOP-EIR)
SCH# 2022090654
GTS# 07-LA-2022-00347

Dear Ms. Reyes,

Thank you for including the California Department of Transportation (Caltrans) in the public review process for the above referenced project. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The proposed project will further create and distribute a new sustainable water supply by purifying cleaned wastewater in the region. The goal is to diversify Southern California water supply and enhance regional operational resilience and reliability.

Caltrans supports Metropolitan Water District of Southern California and Los Angeles County Sanitation Districts joint effort to develop and implement a regional recycled water program. As the project scope is located throughout multiple cities in Los Angeles County, Caltrans recommends providing mitigation measures to avoid or minimized significant contractors may need to prepare a construction traffic control plan. Also, transportation of heavy construction equipment and/or materials that require use of oversized-transport vehicles on State highways will need a Caltrans transportation permit.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve. We look forward to working with our partner agencies in areas where we both can improve the transportation network and connections between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Ms. Ana Reyes
October 19, 2022
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If you have any questions or concerns, please contact Amy Cruz, LDR Coordinator, by e-mail at amy.tran.cruz@dot.ca.gov.

Sincerely,

Miya Edmonson

MIYA EDMONSON
Branch Chief
Local Development Review

cc: State Clearinghouse

NATIVE AMERICAN HERITAGE COMMISSION

October 3, 2022

Ana Reyes
 The Metropolitan Water District of Southern California
 P.O. Box 54153
 Los Angeles, CA 90054-0153

Re: 2022090654, Pure Water Southern California Project, Los Angeles County

Dear Ms. Reyes:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code § 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd. (a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.



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Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

PARLIAMENTARIAN
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AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code § 21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code § 6254 (r) and § 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c) (1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code § 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
 - Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code § 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code § 5097.9 and § 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments


To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

State Water Resources Control Board

November 10, 2022

Metropolitan Water District of Southern California
Attn: Ms. Ana Reyes
P.O. Box 54153
Los Angeles, CA 90054-0153

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA (DISTRICT),
NOTICE OF PREPARATION (NOP) OF AN ENVIRONMENTAL IMPACT REPORT
(EIR) FOR THE PURE WATER SOUTHERN CALIFORNIA PROJECT (PROJECT);
SCH #2022090654

Dear Ms. Ana Reyes:

Thank you for the opportunity to review the NOP for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (State Water Board, DDW) is responsible for issuing water supply permits pursuant to the Safe Drinking Water Act. The Project may fall with the jurisdiction of the Central Los Angeles, San Bernardino, and Hollywood District offices. The DDW District(s) issue domestic water supply permit amendments to the public water systems served with a new or modified source of domestic water supply or new domestic water system components pursuant to Waterworks Standards (Title 22 CCR chapter 16 et seq.). A public water system requires a new water supply permit if it includes the creation of a new public water system or a water supply permit amendment for changes to a water supply source, storage, or treatment and for the operation of new system components including new distribution tanks equal to or over 100,000 gallons, new wells, and treatment systems.

The State Water Board, DDW, as a responsible agency under CEQA, has the following comments on the District's draft NOP. Please include the following in the EIR:

- If the Project would entail the modification of a domestic water supply source or system component as described above, please include a description of all new or modified drinking water system components, the names of the water systems with jurisdiction over those components, and what water systems will be served by the Project with enough detail to determine if a new water supply permit or permit amendment will be required for any of the domestic water systems.
- Please provide detailed Project maps that include all new and modified domestic water system components.
- If water supply permit amendments will be needed due to the Project, please include the State Water Resources Control Board, Division of Drinking Water, in

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

the list of agencies that will be approving a permit, and the associated water supply permit(s).

Once the EIR is ready to be circulated for public review, please ensure the State Water Board is notified. The State Water Board staff will review the draft EIR and provide additional comments, if necessary.

Please contact Terrence Kim at (818) 551-2029 or Terrence.Kim@waterboards.ca.gov if you have any questions regarding permitting requirements for the District; please contact Andres Aguirre at (909) 383-4308 or Andres.Aguirre@waterboards.ca.gov if you have any questions regarding permitting requirements for the Water Facilities Authority; and please contact James Ko (818) 551-2007 or James.Ko@waterboards.ca.gov if you have any questions regarding permitting for Three Valleys Municipal Water District.

Please contact Lori Schmitz of the State Water Board at (916) 449-5285 or Lori.Schmitz@waterboards.ca.gov, if you have any questions regarding this comment letter.

Sincerely,

Lori Schmitz
Environmental Scientist
Division of Financial Assistance
Special Project Review Unit
1001 I Street, 16th floor
Sacramento, CA 95814

Cc:

Office of Planning and Research, State Clearinghouse

Terrence Kim
Associate Sanitary Engineer
Central Los Angeles District

Andres Aguirre
Associate Sanitary Engineer
San Bernardino District

James Ko
Associate Sanitary Engineer
Hollywood District

Regional Agencies

Los Angeles Regional Water Quality Control Board

November 14, 2022

Ms. Ana Reyes
The Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, CA 90054-0153
EP@mwdh2o.com

COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR PURE WATER SOUTHERN CALIFORNIA

Dear Ms. Reyes:

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) provides this comment letter in response to the Metropolitan Water District of Southern California's (MWD) September 2022 Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) for Pure Water Southern California (Project). According to the NOP, MWD held four public virtual scoping meetings for the Project on October 12, 18, 27 and 29 via Zoom platform, and is requesting comments by November 14, 2022. The Los Angeles Water Board appreciates the opportunity to provide input on the proposed Project and looks forward to reviewing the draft EIR once it is available.

Statutory Responsibility and Water Quality Approvals

In accordance with the NOP, the Los Angeles Water Board is providing its statutory responsibilities within the scope of the Project. The Los Angeles Water Board is a state governmental agency within the California Environmental Protection Agency. The Los Angeles Water Board is one of nine regional water boards established by the Porter-Cologne Water Quality Control Act (Cal. Water Code § 13000 et seq.) to regulate water quality and is the principal state agency, along with the State Water Resources Control Board (State Water Board), with primary responsibility for the coordination and control of water quality within Los Angeles and Ventura Counties. Among its statutory responsibilities, the Los Angeles Water Board administers and enforces the Porter-Cologne Water Quality Control Act (California Water Code § 13000 et seq.) and administers certain provisions of the Federal Water Pollution Control Act, i.e., the Clean Water Act (33 U.S.C. §§ 1251–1389 et seq.) among other laws.

As a responsible agency, the Los Angeles Water Board has the authority to regulate the discharge of wastes to surface water, ground water, and land by issuing a National Pollutant Discharge Elimination System (NPDES) permit, prescribing waste discharge

NORMA CAMACHO, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

requirements (WDR) and water reclamation requirements (WRR), and/or issuing section 401 water quality certifications. The Los Angeles Water Board also issues WDRs and/or NPDES permits for stormwater discharges related to construction and industrial activities to ensure that the discharges of wastewater and other waters from the Project do not adversely affect the quality of the waters of the state and its beneficial uses.

Project Description

MWD intends to partner with the Los Angeles County Sanitation District (LACSD) to create Pure Water Southern California, a project that would beneficially reuse approximately 150 million gallons per day (MGD) of treated wastewater from LACSD's Joint Water Pollution Control Plant (JWPCP) in the City of Carson. The Project proposes to purify the treated wastewater through a new advanced water purification facility (AWPF) on undeveloped property within the JWPCP. The advanced-treated water would then be transported to new or existing water distribution facilities in the Cities of Azusa and Upland. The advanced-treated water can be used to for nonpotable, indirect and direct potable reuse purposes. For indirect potable reuse (IPR) applications, MWD contemplates recharging groundwater basins using existing spreading facilities at the San Gabriel Canyon Spreading Grounds, Santa Fe Spreading Grounds, Santa Fe Dam, Rio Hondo Coastal Spreading Grounds, San Gabriel Coastal Spreading Grounds and/or Orange County Groundwater Basin Spreading Grounds. Groundwater recharge can also be achieved using groundwater injection wells located in the City of Carson overlying the West Coast Groundwater Basin and City of Long Beach overlying the Central Groundwater Basin.

For direct potable reuse (DPR) application, MWD contemplates treatment of the advanced-treated water to DPR standards at the AWPF or at one or more offsite locations, including MWD's F.E. Weymouth Water Treatment Plant (WTP) in the City of La Verne, a potential satellite facility tentatively planned between the Santa Fe Dam area and the Weymouth WTP, the Three Valleys Municipal Water District's Miramar WTP in the City of Claremont, or the Inland Empire Utilities Agency's Agua de Lejos WTP in the City of Upland.

Los Angeles Water Board Comments

The Los Angeles Water Board offers the following comments and recommendations on the draft EIR for this project:

1. In the event that the Project generates significant adverse water quality impacts, CEQA requires the consideration and discussion of alternatives to the Project or its location (such as placement of the AWPF, recycled water conveyance system, and treatment facilities) which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is to evaluate the comparative merits of feasible alternatives (CEQA Guidelines Section 15126.6(d)). The draft EIR should provide sufficient information about each

alternative to allow meaningful evaluation, analysis, and comparison with the Project.

2. The Project includes construction of a new AWWP that will treat the tertiary-treated water from the JWPCP. Since the Project proposes to construct on undeveloped land, the draft EIR should describe how stormwater from construction activities will be managed and whether the Construction General Permit Order 2009-0009-DWQ, which was subsequently amended by Orders 2010-0014-DWQ and 2012-0005-DWQ¹, is applicable to this project. In addition, the draft EIR should describe how stormwater from the AWWP will be managed after construction is complete, and whether the Industrial General Permit Order 2014-0057-DWQ, which was subsequently amended by Orders 2015-0122-DWQ and 2018-0028-DWQ is applicable to this project. In the event that excess groundwater is generated from the construction activities, the draft EIR should also describe how groundwater will be managed and whether the General Construction and Project Dewatering Permit Order R4-2018-0125 is applicable to this project.
3. The advanced-treated recycled water will be used for indirect potable reuse by groundwater recharge at the spreading grounds and via injection wells. To ensure adequate protection of the drinking water supply in the Los Angeles and Orange Counties, the draft EIR should describe how the recycled water will comply with the Water Quality Control Plans for the Los Angeles Region and Santa Ana Region (collectively Basin Plans), the Water Quality Control Policy for Recycled Water (Recycled Water Policy), and the Uniform Water Recycling Criteria in the California Code of Regulations Title 22, Division 4, Chapter 3.
4. The Project also includes the ability for water agencies such as the Los Angeles Department of Water and Power and West Basin Municipal Water District to connect to the recycled water conveyance system to serve industrial users. The draft EIR should describe how the water quality in the conveyance system is suitable for industrial use and how the project will ensure that nonpotable water quality will be maintained by each agency. In addition, any anticipated inter-agency agreements between the companies describing the responsibilities should also be provided in the draft EIR.

For any questions, please contact Adam Taing at (213) 576-6752 or at Adam.Taing@waterboards.ca.gov.

Sincerely,

Renee Purdy
Executive Officer

¹ On September 9, 2022, the Construction General Permit was amended through Order 2022-0057-DWQ and will become effective on September 1, 2023. [Construction General Permit](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0057-dwq.pdf) <https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0057-dwq.pdf> [as of Nov 14, 2022].



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

November 11, 2022

EP@mwdh2o.com

Ms. Ana Reyes, Senior Environmental Specialist
The Metropolitan Water District of Southern California
Environmental Planning Section
700 North Alameda Street
Los Angeles, California 90012

Notice of Preparation of a Draft Environmental Impact Report for the Pure Water Southern California (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,⁶ South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,⁷ and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.⁸

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at swangl@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW

LAC221004-04

Control Number

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

⁷ South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

⁸ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.



SOUTHERN CALIFORNIA
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November 9, 2022

Ana Reyes, Senior Environmental Specialist
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Phone: (213) 217-6017
E-mail: AREyes@mwdh2o.com

**RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report
for the Pure Water Southern California [SCAG NO. IGR10746]**

Dear Ana Reyes,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Pure Water Southern California ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies.¹

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies. Finally, SCAG is the authorized regional agency for Intergovernmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Pure Water Southern California in Los Angeles County. The proposed project includes the construction of a new Advanced Water Purification facility that would produce approximately 150 million gallons per day of purified water.

When available, please email environmental documentation to IGR@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Intergovernmental Review (IGR) Program, attn.: Annaleigh Ekman, Associate Regional Planner, at (213) 630-1427 or IGR@scag.ca.gov. Thank you.

Sincerely,

Frank Wen, Ph.D.
Manager, Planning Strategy Department

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2020 RTP/SCS (Connect SoCal) for the purpose of determining consistency for CEQA.

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
PURE WATER SOUTHERN CALIFORNIA [SCAG NO. IGR10746]**

CONSISTENCY WITH CONNECT SOCIAL

SCAG provides informational resources to facilitate the consistency of the proposed project with the adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with Connect SoCal.

CONNECT SOCIAL GOALS

The SCAG Regional Council fully adopted [Connect SoCal](#) in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCIAL GOALS	
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>
Goal #3:	<i>Enhance the preservation, security, and resilience of the regional transportation system</i>
Goal #4:	<i>Increase person and goods movement and travel choices within the transportation system</i>
Goal #5:	<i>Reduce greenhouse gas emissions and improve air quality</i>
Goal #6:	<i>Support healthy and equitable communities</i>
Goal #7:	<i>Adapt to a changing climate and support an integrated regional development pattern and transportation network</i>
Goal #8:	<i>Leverage new transportation technologies and data-driven solutions that result in more efficient travel</i>
Goal #9:	<i>Encourage development of diverse housing types in areas that are supported by multiple transportation options</i>
Goal #10:	<i>Promote conservation of natural and agricultural lands and restoration of habitats</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG CONNECT SOCIAL GOALS		
Goal		Analysis
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.		etc.

Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. Of particular note are multiple strategies included in Chapter 3 of Connect SoCal intended to support implementation of the regional Sustainable Communities Strategy (SCS) framed within the context of focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a Green Region. To view Connect SoCal and the accompanying technical reports, please visit the [Connect SoCal webpage](#). Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

SCAG staff would like to call your attention to the [Water Action Resolution](#) unanimously adopted by SCAG's Regional Council on October 6, 2022 that formally affirmed the drought and water shortage emergency in Southern California and called on local and regional partners to join together to adopt an "all of the above" approach to addressing the region's water challenges and catalyzing opportunities. The Resolution calls on SCAG to take action and support partners to reduce water use; improve water conservation, reuse, and efficiency; enhance water systems' health and resilience; pursue and potentially implement new water supply and storage opportunities; and support investments in water infrastructure and conservation practices that support the region's economic and population growth and fosters planning for the region's housing needs.

DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG's 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood

level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal's Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the [Connect SoCal Demographics and Growth Forecast Technical Report](#). The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts				Adopted City of Carson Forecasts			
	Year 2020	Year 2030	Year 2035	Year 2045	Year 2020	Year 2030	Year 2035	Year 2045
Population	19,517,731	20,821,171	21,443,006	22,503,899	94,932	98,857	100,947	105,169
Households	6,333,458	6,902,821	7,170,110	7,633,451	26,298	28,166	29,023	30,668
Employment	8,695,427	9,303,627	9,566,384	10,048,822	64,520	66,325	67,236	70,035

MITIGATION MEASURES

SCAG staff recommends that you review the [Final Program Environmental Impact Report](#) (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG's Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the [PEIR webpage](#) and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

Local Agencies

November 14, 2022

Mr. Adel Hagekhalil
General Manager
The Metropolitan Water District of Southern California
700 N. Alameda Street
Los Angeles, CA 90012

RE: Comments on Notice of Preparation for Pure Water Southern California

The undersigned Metropolitan Water District of Southern California (Metropolitan) member agencies are pleased to see Metropolitan moving forward on Pure Water Southern California, which will increase the region's local water supply and improve regional supply reliability.

Pure Water Southern California has the potential to serve the Southern California region in a multitude of ways. Not only would this program create a new local supply of water that is drought proof, it would also establish a large capacity conveyance system to deliver water for various purposes, including indirect potable reuse (IPR), direct potable reuse (DPR) and industrial applications. The program's proposed conveyance system must be evaluated holistically together with Metropolitan's existing system to ensure regional reliability and risk parity among your member agencies, including the critical needs of the State Water Project dependent area member agencies.

On August 16, 2022, by Minute Item 52946, the Metropolitan Board adopted a resolution that affirmed Metropolitan's call to action and commitment to regional reliability for all its member agencies. Specifically, the action resolved that serving any member agency from only one supply source creates a long-term and unacceptable risk. Further, the resolution committed that Metropolitan would reconfigure and expand (1) its existing portfolio to provide sufficient access to the integrated system of water sources, conveyance and distribution, storage and (2) programs to achieve equivalent levels of reliability to all members. Pure Water Southern California provides a unique opportunity for Metropolitan to achieve the objectives of its resolution and address the system deficiencies that currently limit State Water Project dependent area agencies' access to existing storage and supplies. The existing lack of Metropolitan conveyance infrastructure has resulted in an isolated shortage amongst six Metropolitan member agencies who alone are subject to a strict Emergency Water Conservation Plan, requiring some agencies to reduce their water use by more than 70 percent. **The commitment to fix Metropolitan's existing conveyance infrastructure deficiencies and achieve the intent of the August 2022 Board resolution must be addressed as part of the scoping effort for preparation of the Draft Environmental Impact Report for Pure Water Southern California.**

The Pure Water Southern California program is expected to deliver approximately 155 TAFY of purified water to strategic locations throughout Metropolitan's service territory. A new conveyance facility that directly connects Pure Water Southern California supplies to the State Water Project dependent area member agencies would improve regional water supply reliability by better connecting Metropolitan's northwestern service area with its Central Pool. Currently, the northwestern portion of Metropolitan's service territory can only receive supplemental supplies from the State Water Project. By expanding Pure Water Southern California's conveyance system, the program would alleviate the disparity in reliability between Metropolitan's State Water Project dependent area member agencies and all other member agencies.

Additionally, new connections along this conveyance facility would provide supplies to agencies that need replenishment water. The raw water pipeline would support minimum flow requirements needed through Jensen Treatment Plant when State Water Project supplies are limited and enable delivery of future recycled water supplies from Pure Water Southern California throughout all of Metropolitan's service territory. Furthermore, these supplies would provide a resiliency benefit to the region in the event of a catastrophic earthquake along the San Andreas Fault. All imported supplies to the region cross the San Andreas Fault at least once. Future recycled water supplies from Pure Water Southern California would help meet some of the region's demands while the aqueducts delivering imported water supplies are temporarily out of service.

Scoping efforts for the recommended Pure Water Southern California program must adequately address the Board-adopted State Water Project dependent area problem statement and objective to achieve risk parity amongst all of Metropolitan's member agencies. Regional connectivity is necessary to ensure that isolated shortages amongst Metropolitan member agencies do not continue to occur in the future. **For these reasons, it is imperative that additional infrastructure to convey future Pure Water Southern California supplies to Metropolitan's State Water Project dependent area member agencies be considered as part of the Draft Environmental Impact Report.**

We look forward to further development of the Pure Water Southern California program and continued collaboration with you and your team to improve regional supply reliability.

Sincerely,



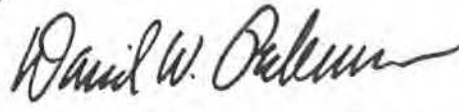
Calleguas Municipal Water District



City of Los Angeles



Inland Empire Utilities Agency



Las Virgenes Municipal Water District



Three Valleys Municipal Water District



Upper San Gabriel Valley Municipal Water District

cc: Ms. Ana Reyes
The Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, CA 90054-0153



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November 10, 2022

Ms. Ana Reyes
The Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, CA 90054-0153
Copy transmitted via email: EP@mwdh20.com

Subject: City of Cerritos Comments Regarding Notice of Preparation of a Draft Environmental Report for the Pure Water Southern California Project

Dear Ms. Reyes,

Thank you for providing the City of Cerritos with an opportunity to review and comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the proposed Pure Water Southern California project. While the NOP provides a broad overview of the proposed project, the City of Cerritos would like to take this opportunity to provide comments specifically related to the location of the proposed backbone pipeline.

The City of Cerritos has reviewed the NOP and we respectfully submit the following comments related to the Pure Water Southern California Project for review and consideration by the Metropolitan Water District of Southern California in preparation of the forthcoming Draft EIR:

1. No Use of SCE Easements in Cerritos. MWD representatives have indicated a proposed path for the backbone pipeline that would run under the SCE easements located in the City of Cerritos, parallel to and along the east side of the San Gabriel River. The City of Cerritos currently has license agreements with SCE for the aforementioned easements, and the proposed backbone pipeline route would interfere with City Facilities such as Liberty Park and Iron-Wood Nine Golf Course and an automobile storage lot that supports the Cerritos Auto Square. Additionally, the City of Cerritos currently has an existing 24-inch Reclaimed Water Main that runs along the east side of the San Gabriel River, thereby limiting the ability for additional infrastructure in this area. The City of Cerritos requests that any proposed backbone pipeline route not interfere with the SCE easements and/or any area located in or around the Cerritos Auto Square.
2. Palo Verde Avenue Route near Cerritos. MWD representatives have suggested a possible alternative route for the proposed backbone pipeline that would run northbound on Palo Verde Avenue from the City of Lakewood to the 91 Freeway in the City of Bellflower to the west side of the San Gabriel River. The City of Cerritos would not be opposed to this option and finds this alternative acceptable. This

option would avoid any interference with the existing commercial and recreational facilities mentioned in the previous comment. Please note that the easterly 20 feet of Palo Verde Avenue is located within the City of Cerritos; the majority of the 80-foot-wide street right-of-way is located within the cities of Lakewood and Bellflower.

3. Consultation with City of Cerritos. Prior to receiving the NOP, the City of Cerritos had not been consulted regarding the proposed backbone pipeline location. The City of Cerritos requests that MWD staff continue to work closely with Cerritos staff to identify constraints and opportunities related to the pipeline location to ensure that Cerritos streets and facilities are not adversely impacted. The final location of the pipeline in any portion of Cerritos shall be subject to the review and approval of the City of Cerritos, including the issuance of an encroachment permit prior to construction.

Thank you in advance for your consideration of the aforementioned concerns and comments related the Pure Water Southern California project. The City of Cerritos respectfully requests that these comments be addressed in connection with the Draft EIR for the proposed project. Should you have any questions, please do not hesitate to contact me at (562) 916-1220.

Sincerely,



Robert A. Lopez
Director of Public Works/Water & Power

cc (via e-mail)
Art Gallucci, City Manager
Bill Ihrke, City Attorney
Torrey Contreras, Senior Assistant City Manager
Kristin Aguila, Director of Community Development
Dario Simoes, Deputy Director of Public Works/City Engineer
Jose Arroyo-Gutierrez, Water Superintendent
Sergio Huizar, Management Analyst
Rupam Soni, Community Relations Manager, MWD, RSoni@mw dh2o.com



City of Duarte

1600 Huntington Drive, Duarte, CA 91010 | Tel (626) 357-7931 | Fax (626) 358-0018 | accessduarte.com

November 14, 2022

Ms. Ana Reyes
The Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, CA 90054

Response to Notice of Preparation of EIR for Pure Water Southern California Project

Dear Ms. Reyes,

On behalf of the City of Duarte ("Duarte"), we have reviewed the Notice of Preparation ("NOP") advising that the Metropolitan Water District of Southern California ("MWD") intends to prepare an Environmental Impact Report ("EIR") for the project entitled "Pure Water Southern California" ("Project"). The Project is characterized by the construction and operation of a 42-mile treated water pipeline and related supporting facilities.

The City has determined several potential issues with the Project that may cause significant impacts if not properly analyzed and mitigated. We have listed these issues and would like to see them included and addressed in the EIR. The concerns of the City are as follows:

• GENERAL

- The City requests a detailed map and related diagrams of any potential alignment that enters or is located within one-quarter mile of any Duarte city boundary. The City is concerned that the map provided with the NOP does not match any available maps and diagrams of potential alignments available through the Project website.
- The City requests further detail on why alignments may need to enter City boundaries instead of following the path of the San Gabriel River, freeways, and/or utility right-of-way's to the pipeline's final endpoint.
- The City may be interested in the use of treated wastewater for municipal and park related purposes. Please provide information on the potential municipal use of treated wastewater carried by the Project pipeline.

• GEOLOGY AND SOILS

- The City is concerned with potential for vibration induced by trenchless drilling methods, especially in the case of large diameter pipelines such as is involved in the Project.
- The City is concerned with potential damage to structures and infrastructure that may be caused due to disruption and vibration of soil during construction phases of the Project.

• HAZARDS AND HAZARDOUS MATERIALS

- The City is concerned with potential negative interaction between the construction phases of the Project and existing sanitary sewer systems that operate near the proposed depth of the Project pipeline. The City would like to see proper mitigation in place to avoid disruption to these sewer systems in order to prevent hazardous ground contamination.

• HYDROLOGY AND WATER QUALITY

- The City is concerned with addressing the discharge of water from the Project in the Los Angeles Region MS4 Permit.

- The City has concerns with water that is subject to spreading ground exposure and how that received water will be monitored for concerns related to MS4s.
- The City is concerned with potential groundwater pollution hazards related to groundwater recharge of potable reuse water near the City boundaries.
- The City requests that the Project address ways in which stakeholder agencies will be notified of planned discharge events. How will stakeholder agencies coordinate with MWD on these events?

- **TRANSPORTATION**

- The City has strict existing restrictions related to truck weight limits and heavy vehicle traffic routes. The City is concerned with heavy vehicle traffic created by the Project and the potential for any traffic pattern that may utilize Duarte roadways to access potential sites of the Project. The City requests analysis of these issues and mitigation measures that restrict heavy vehicle traffic within the City due to construction activity within and beyond City boundaries to the greatest degree possible.
- The City is concerned with operational hours, disruption to traffic flow, and roadway stress that may be created Project construction sites or staging areas that may be located within City boundaries.
 - The City requests further analysis on the locations and operational details of construction areas and staging areas related to the Project and mitigation measures to reduce traffic and roadway impacts created by these locations.
- Due to the likely scale of excavation work and the disruptions imposed on the local population, the City requests the avoidance of any pipeline alignments that impact local streets or critical arterial roadways.
 - The City requests that the Project analyze alternative alignments that can mitigate these issues to the greatest possible extent.

- **UTILITIES**

- The City is concerned that the Project may disrupt access to utility services to area residents or businesses during the construction phase of the Project.
 - The City requests mitigations to intended and unintended disruptions to utility services and that the Project include measures to reduce utility related impacts to residents who may be at increased risk of issues related to disruption to utilities.

C: California American Water
8657 Grand Avenue
Rosemead, CA 91770

Upper San Gabriel Valley Water District
602 E. Huntington Drive, Suite B.
Monrovia, CA 91016



FOOTHILL MUNICIPAL WATER DISTRICT

Altadena - La Cañada Flintridge - La Crescenta

October 6, 2022

Ms. Ana Reyes
The Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, CA 90054-0153

Dear Ms. Reyes:

Pure Water Southern California Environmental Review Process Comments

This letter is to express Foothill Municipal Water District's support in moving forward with Pure Water Southern California. As climate change continues to impact imported water resources, it is vital for Metropolitan to develop sustainable supplies that are within its service area. Pure Water Southern California meets that objective along with other actions such as increased conservation. At full scale, the plant will be a major water supply for southern California meeting the needs of 500,000 households. The multi-step treatment process ensures that good quality water is being produced for eventual use. Pure Water Southern California exemplifies the forward-thinking project we must have to meet the water needs of Southern California consumers.

Regards,

Nina Jazmadarian
General Manager

cc: FMWD Board of Directors on the bottom.



6075 Kimball Avenue • Chino, CA 91708
P.O. Box 9020 • Chino Hills, CA 91709
TEL (909) 993-1600 • FAX (909) 993-1985
www.ieua.org

November 10, 2022

Sent via email to: ep@mwdh2o.com

Mr. Adel Hagekhalil, General Manager
c/o Ms. Anna Reyes
Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, CA 90054

Re: Support for Metropolitan's Pure Water Southern California Project

Dear Mr. Hagekhalil,

The Inland Empire Utilities Agency (IEUA) and the undersigned agencies wish to thank the Metropolitan Water District of Southern California (Metropolitan) for the opportunity to provide comments on the Pure Water Southern California Draft Environmental Impact Report (Draft EIR) scoping process.

As a Metropolitan member agency and wholesale provider of imported and recycled water supplies, IEUA is fully supportive of this opportunity to develop 150 million gallons per day (mgd) of new drought-proof water supplies for delivery in Metropolitan's service area, including the Inland Empire Utilities Agency. The new potable water produced by this project provides both direct and indirect regional benefits to IEUA's retail water agencies who depend on water supplies provided by Metropolitan to complement the region's substantial investments in local supplies and storage, including recycled water, groundwater recharge with stormwater capture, and water use efficiency.

As one of six Metropolitan member agencies that depends on the State Water Project (SWP) for regional water supply reliability, prolonged drought conditions have proven the need for local supply projects like Pure Water Southern California (Pure Water SoCal/Project) providing the approximately 930,000 people we serve improved water supply reliability. New, drought proof water supplies, like those delivered by the Project, can help our region further diversify water supplies, enhance in-region storage opportunities, and help reduce the need for future water allocations through an integrated One Water approach.

Water Smart - Thinking in Terms of Tomorrow

Steven J. Elie
President

Michael Camacho
Vice President

Marco Tule
Secretary/Treasurer

Jasmin A. Hall
Director

Paul Hofer
Director

Shivaji Deshmukh
General Manager

When scoping the Project's Draft EIR, the undersigned agencies encourage Metropolitan to include a broad scope to supports a final design that maximizes the beneficial use of regional potable supplies when and where they are needed most. Building flexibility into the Draft EIR will allow Metropolitan to explore potential project connections to IEUA's service area that improves regional resilience against changing and more frequent extreme hydrological conditions while maximizing economies of scale. We offer the specific suggestions below for the scoping of the Draft EIR in the spirit of partnering with Metropolitan and maximizing the benefits of the Pure Water Southern California project to the IEUA region.

1) Include the Potential for Chino Groundwater Basin Indirect Potable Reuse (IPR)

The preliminary Project maps provided by Metropolitan include injection wells and spreading grounds adjacent to a new pipeline that originates at the Joint Water Pollution Control Plant with the final indirect potable reuse location at Canyon Spreading Grounds. We support including these options for IPR with groundwater augmentation and ask Metropolitan to consider including additional injection wells and spreading grounds to maximize the potential for indirect potable reuse. As one of the largest groundwater basins in Southern California, connections to existing injection wells and spreading grounds in the Chino Groundwater Basin provide Metropolitan and IEUA with enhanced regional resiliency opportunities, especially if the new regulatory framework for direct potable reuse (DPR) currently under development proves too difficult or costly to incorporate into the project.

2) Include an Option for Additional Direct Potable Reuse Delivery Infrastructure

With DPR regulations expected to be released within the construction timeline of Pure Water SoCal, we ask that the current optional 60 mgd DPR pipeline from the Santa Fe Spreading Grounds to Metropolitan's Weymouth Treatment Facility (Weymouth) continue to be included in the Draft EIR. Additionally, we support delivering this water to the Water Facility Authorities' Agua de Lejos Water Treatment Plant and potentially other connections in IEUA's service area. Including additional potable delivery connections provides flexibility for IEUA's retail water agencies to access the new supplies to efficiently meet consumptive demands as needed, or when storage is full, or groundwater supplies may be unavailable.

3) Design Pipelines to the IEUA Region for Redundancy and Flexibility

Recent drought conditions have highlighted the need for redundancy in water infrastructure and the ability to redirect water supplies to where they are needed most. As new infrastructure is designed, we suggest that it be designed for the potential future option to flow to the IEUA region bidirectionally, thereby enhancing interregional resiliency.

In conclusion, the undersigned agencies fully support Metropolitan's Pure Water Southern California project. As Metropolitan scopes the Draft EIR, we ask that it includes the flexibility to allow for all three of the following scenarios: 1) Recharge the Chino Basin with Metropolitan's new water supplies, 2) Delivery of Metropolitan's DPR water to the Water Facility Authorities' Agua de Lejos Water Treatment Plant and possibly other connections within IEUA's service area, and 3) design pipelines for bidirectional flow to increase overall system reliability.

We applaud Metropolitan's initiative and commitment to developing new local water supplies and support the Pure Water Southern California project. To discuss these comments further, please contact Ms. Christiana Daisy at cdaisy@ieua.org or (909) 993-1762.

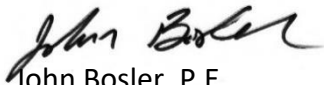
Sincerely,



Shivaji Deshmukh, P.E.
General Manager
Inland Empire Utilities Agency



Ben Montgomery
City Manager
City of Chino Hills



John Bosler, P.E.
General Manager/CEO
Cucamonga Valley Water District



Justin Scott-Coe, PhD, CSDM
General Manager
Monte Vista Water District



Courtney Jones, P.E.
Water Resources and Regulatory
Affairs Director
Ontario Municipal Utilities Company



Josh Swift
Vice President and General Manager
San Gabriel Valley Water Company
Fontana Water Company Division



11.9.22

Braden Yu, P.E.
Public Works Director/City Engineer
City of Upland



Terry Catlin
General Manager
Water Facility Authority

From: [Diana Tang](#)
To: rseni@mwdh2o.com; purewater@mwdh2o.com; [Reyes, Ana M](#); ep@mwdh2o.com; [PureWater Comments](#)
Subject: Re: EIR Scoping Comments - Diana Tang
Date: Monday, November 14, 2022 4:53:56 PM

For your reference, the following was submitted.

EIR Scoping Comments

Name	Diana Tang
Organization (optional)	City of Long Beach, Long Beach Water
Email. We'll use your email address to send you a copy of your responses and comments.	diana.tang@lbwater.org
Would you like to be added to our email list for this project?	Yes
Please provide your comments.	<p>Dear MWD Pure Water team:</p> <p>Please find attached, comments from the City of Long Beach and Long Beach Water Department regarding the scope of Metropolitan's draft Environmental Impact Report for Pure Water Southern California. We sincerely appreciate this opportunity to provide information on how to make this project successful for all.</p> <p>In summary, Long Beach Water is requesting:</p> <ul style="list-style-type: none">-- Los Angeles River & 710 Freeway Crossing. Long Beach Water's number one priority in this scoping process is to request the Pure Water EIR co-locate a new Long Beach-owned pipeline that crosses the Los Angeles River and 710 freeway along with the Pure Water pipeline.-- J. Will Johnson Reservoir Indirect Potable Reuse Pipelines. Adding new conveyance pipelines from Pure Water to JWJ supports a Pure Water to Central Basin connection, enabling the earliest opportunity for groundwater expansion in the West Coast Basin and Central Basin using Pure Water.-- Port of Long Beach and West Long Beach Recycled Water Pipelines. Inclusion of Port of Long Beach recycled water pipelines as part of the larger Pure Water environmental review will streamline the process for delivering Pure

Water to industrial users.

Long Beach Public Works is requesting:

- Provide specific location/alignment details and construction schedule for Backbone Pipeline and any associated facilities or infrastructure proposed within the City of Long Beach.
- Include anticipated timeline for construction on Del Amo Blvd. Provide description of City responsibilities as it pertains to City of Long Beach and City of Lakewood. Provide all applicable permitting, including permits as it pertains to the Construction General Permit.
- Recycled Water Pipeline, LA River crossing. The City of Long Beach or the Long Beach Water Department should begin planning a recycled water main to cross the LA River to serve future demand.

We look forward to the future working meetings that lay ahead. Please feel free to reach out at anytime if you have questions.

Best,

Diana

Please feel free to upload any files or images related to your comments.

[LongBeach_PureWater_ScopingComments_11-14-22.pdf](#)

You can [edit this submission](#) and [view all your submissions](#) easily.



MAYOR ROBERT GARCIA
CITY OF LONG BEACH

November 14, 2022

The Honorable Adán Ortega
The Metropolitan Water District of Southern California
700 North Alameda Street
Los Angeles, CA 90012-2944

RE: Pure Water Southern California Public Comment – City of Long Beach

Dear Chairman Ortega:

On behalf of the City of Long Beach, I am pleased to submit this comment letter in response to The Metropolitan District of Southern California's (MWD) Notice of Preparation of a Draft Environmental Impact Report for the Pure Water Southern California project. I applaud MWD's ambition and am encouraged by the regional pursuit to replace up to 150 million gallons of imported water use per day using locally advanced treated recycled water in partnership with the Los Angeles County Sanitation District.

In the long run, my hope is that the Pure Water Southern California project will enable the City to become 100 percent drought resilient while we maintain our long-standing relationship with MWD, as a MWD member agency. In the short-term, however, we recognize the construction of such a large-scale project will undoubtedly impact our city and neighborhoods.

With these considerations in mind, I am sharing Long Beach's technical comments in two letters:

- The first is from the **Long Beach Water Department** and shares from a water infrastructure and supply perspective considerations we would like MWD to take into account with respect to existing water use and conveyance infrastructure, as well as potential future areas of partnership; and,
- The second is from the **City of Long Beach Public Works Department** and shares from a construction and permitting perspective considerations that must be addressed for the project to move smoothly during construction in our city.

Both sets of comments are important, as is the goal of offsetting imported water use using advanced treated recycled water. I wish you the best as the environmental review process begins. Thank you for the opportunity to provide feedback.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Garcia", is written over a light blue rectangular background.

Mayor Robert Garcia
City of Long Beach

November 14, 2022

Adel Hagekhalil, General Manager
The Metropolitan Water District of Southern California
700 North Alameda Street
Los Angeles, CA 90012-2944

RE: Pure Water Southern California Public Comment – Public Works Department

Dear Mr. Hagekhalil:

This letter is on behalf of the City of Long Beach Public Works Department to comment on a Notice of Preparation of a Draft Environmental Impact Report and Notice of Scoping Public Meetings for Pure Water Southern California. Pure Water Southern California is a proposed partnership between The Metropolitan Water District of Southern California and Los Angeles County Sanitation District to produce up to 150 million gallons per day of purified water.

In the City of Long Beach, the Public Works Department strives to operate, preserve, and enhance the City's various physical infrastructure systems. In order for the Public Works Department to continue these efforts, the Department provides a variety of community services including permitting, repair, rehabilitation, and general upkeep of City streets, public trees, sidewalks, storm drains system, and City structures throughout the City. In addition, the Public Works Department works closely with Long Beach Water Department on projects that are a beneficial to our community in Long Beach. Therefore, in reference to the proposed Pure Water Southern California project, please also consider the comments submitted by our Long Beach Water Department, which are included in this overall comment letter along with the comments from the City of Long Beach Public Works Department noted below.

Comments regarding the proposed Pure Water Southern California project:

- Provide specific location/alignment details and construction schedule for Backbone Pipeline and any associated facilities or infrastructure proposed within the City of Long Beach. This will provide further information for overlap of other construction projects and any impacts in the City.
- Include anticipated timeline for construction on Del Amo Blvd. According to Attachment A, Figure 1, Del Amo Blvd. appears to be a major street included in the Backbone Pipeline. This street transitions from City of Long Beach to the City of Lakewood then back to the City of Long Beach, moving West to East. Provide description of City responsibilities as it pertains to City of Long Beach and City of Lakewood. Provide all applicable permitting, including permits as it pertains to the Construction General Permit.
- The City of Long Beach or the Long Beach Water Department should begin planning a recycled water main to cross the LA River to serve future demand. This could be incorporated into the new Shoemaker Bridge project, or at another bridge/utility

crossing. Significant recycled/industrial water resources and infrastructure are planned west of the LA River, a new pipeline would bring these resources across the river and serve future demand in an area of the City that does not have any existing recycled water infrastructure. City projects, infrastructure, and development projects could be constructed to make use of this water and offset existing and future potable use.

Thank you for the opportunity to comment on the Pure Water Southern California project. If you should have any questions or concerns, please contact Melissa You, Program Management Officer, City of Long Beach Public Works Department at (562) 570-5524 or Melissa.You@longbeach.gov.

Sincerely,



Eric Lopez
Director of Public Works

From: [Diana Tang](#)
To: rseni@mwdh2o.com; purewater@mwdh2o.com; [Reyes, Ana M](#); ep@mwdh2o.com; [PureWater Comments](#)
Subject: Re: EIR Scoping Comments - Diana Tang
Date: Monday, November 14, 2022 4:53:56 PM

For your reference, the following was submitted.

EIR Scoping Comments

Name	Diana Tang
Organization (optional)	City of Long Beach, Long Beach Water
Email. We'll use your email address to send you a copy of your responses and comments.	diana.tang@lbwater.org
Would you like to be added to our email list for this project?	Yes
Please provide your comments.	<p>Dear MWD Pure Water team:</p> <p>Please find attached, comments from the City of Long Beach and Long Beach Water Department regarding the scope of Metropolitan's draft Environmental Impact Report for Pure Water Southern California. We sincerely appreciate this opportunity to provide information on how to make this project successful for all.</p> <p>In summary, Long Beach Water is requesting:</p> <ul style="list-style-type: none">-- Los Angeles River & 710 Freeway Crossing. Long Beach Water's number one priority in this scoping process is to request the Pure Water EIR co-locate a new Long Beach-owned pipeline that crosses the Los Angeles River and 710 freeway along with the Pure Water pipeline.-- J. Will Johnson Reservoir Indirect Potable Reuse Pipelines. Adding new conveyance pipelines from Pure Water to JWJ supports a Pure Water to Central Basin connection, enabling the earliest opportunity for groundwater expansion in the West Coast Basin and Central Basin using Pure Water.-- Port of Long Beach and West Long Beach Recycled Water Pipelines. Inclusion of Port of Long Beach recycled water pipelines as part of the larger Pure Water environmental review will streamline the process for delivering Pure

Water to industrial users.

Long Beach Public Works is requesting:

- Provide specific location/alignment details and construction schedule for Backbone Pipeline and any associated facilities or infrastructure proposed within the City of Long Beach.
- Include anticipated timeline for construction on Del Amo Blvd. Provide description of City responsibilities as it pertains to City of Long Beach and City of Lakewood. Provide all applicable permitting, including permits as it pertains to the Construction General Permit.
- Recycled Water Pipeline, LA River crossing. The City of Long Beach or the Long Beach Water Department should begin planning a recycled water main to cross the LA River to serve future demand.

We look forward to the future working meetings that lay ahead. Please feel free to reach out at anytime if you have questions.

Best,

Diana

Please feel free to upload any files or images related to your comments.

[LongBeach_PureWater_ScopingComments_11-14-22.pdf](#)

You can [edit this submission](#) and [view all your submissions](#) easily.



MAYOR ROBERT GARCIA
CITY OF LONG BEACH

November 14, 2022

The Honorable Adán Ortega
The Metropolitan Water District of Southern California
700 North Alameda Street
Los Angeles, CA 90012-2944

RE: Pure Water Southern California Public Comment – City of Long Beach

Dear Chairman Ortega:

On behalf of the City of Long Beach, I am pleased to submit this comment letter in response to The Metropolitan District of Southern California's (MWD) Notice of Preparation of a Draft Environmental Impact Report for the Pure Water Southern California project. I applaud MWD's ambition and am encouraged by the regional pursuit to replace up to 150 million gallons of imported water use per day using locally advanced treated recycled water in partnership with the Los Angeles County Sanitation District.

In the long run, my hope is that the Pure Water Southern California project will enable the City to become 100 percent drought resilient while we maintain our long-standing relationship with MWD, as a MWD member agency. In the short-term, however, we recognize the construction of such a large-scale project will undoubtedly impact our city and neighborhoods.

With these considerations in mind, I am sharing Long Beach's technical comments in two letters:

- The first is from the **Long Beach Water Department** and shares from a water infrastructure and supply perspective considerations we would like MWD to take into account with respect to existing water use and conveyance infrastructure, as well as potential future areas of partnership; and,
- The second is from the **City of Long Beach Public Works Department** and shares from a construction and permitting perspective considerations that must be addressed for the project to move smoothly during construction in our city.

Both sets of comments are important, as is the goal of offsetting imported water use using advanced treated recycled water. I wish you the best as the environmental review process begins. Thank you for the opportunity to provide feedback.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Garcia", written over a light blue rectangular background.

Mayor Robert Garcia
City of Long Beach



Long Beach Water

Exceptional Water • Exceptional Service

Christopher J. Garner
General Manager

1800 E. Wardlow Road, Long Beach, CA 90807-4931
562.570.2300 | lbwater.org

November 14, 2022

Adel Hagekhalil, General Manager
The Metropolitan Water District of Southern California
700 North Alameda Street
Los Angeles, CA 90012-2944

RE: Pure Water Southern California Public Comment -- Long Beach Water Department

Dear Mr. Hagekhalil:

On behalf of the Long Beach Water Department (Long Beach Water), I write to comment on the Notice of Preparation for the Draft Environmental Impact Report (EIR) for Pure Water Southern California (Pure Water).

Long Beach Water is pleased to be a partner with The Metropolitan Water District of Southern California (MWD) and Los Angeles County Sanitation District (Sanitation District) on this project. In August 2020, we signed a Letter of Intent to collaborate on future agreements for the purchase and delivery of Pure Water advanced treated water and continue to be encouraged by the proposal as it develops.

Before diving into the water resource opportunity Pure Water presents, we would like to highlight the community aspect of Long Beach Water's role as a public water agency. Long Beach Water serves the entirety of the Long Beach community – inclusive of nearly 500,000 residents, local small businesses, the Port of Long Beach, Long Beach Airport, large K-12 school system, CSU Long Beach, Long Beach Community College, multiple area hospitals and a growing space industry. We provide safe, clean, and affordable drinking water to our community, and we take great care to value quality of life.

Now, back to water. Long Beach Water's foundation for water supply is our local groundwater. We are located atop the Central Basin and West Coast Basin where we have groundwater rights in both basins that collectively account for 60% of our local water supply needs. Long Beach Water's intent is to use Pure Water to support groundwater augmentation and extraction in one or both basins, depending on feasibility. We are also looking at ways to bring Pure Water to industrial users. Consistent with the terms of our Pure Water Letter of Intent, we have moved forward on studies to explore these opportunities.

- **A System Optimization Study** to determine how best to expand Long Beach Water's Groundwater Collection System;
- **A Port of Long Beach and West Long Beach Recycled Water Study** to determine how best to offset imported potable industrial use at the Port of Long Beach with Pure Water; and
- **A Groundwater Augmentation Study** to determine how best to maximize groundwater injection and extraction in the Central Basin and West Coast Basin.

Primary Pure Water Scoping Comments and Suggestions

These studies have identified three long-term operational needs proximal to the Pure Water pipeline. They are described below and summarized in Attachment A. To maximize the impact of Pure Water in the region, we are respectfully asking MWD to include these three focus areas in the Pure Water EIR.

- **Los Angeles River & 710 Freeway Crossing.** Long Beach Water's number one priority in this scoping process is to request the Pure Water EIR co-locate a new Long Beach-owned pipeline that crosses the Los Angeles River and 710 freeway along with the Pure Water pipeline, as shown in Attachment A-1. This pipe crossing will allow Long Beach to move Pure Water augmented groundwater from Central and West Coast Basin to provide water supply resiliency to our entire service area. We recognize MWD will need to know the pipe diameter, hydraulic grade line, pick and drop off points and Long Beach Water is working to establish this information as soon as possible.

- **J. Will Johnson Reservoir and Indirect Potable Reuse Pipelines.** Long Beach Water is requesting the Pure Water EIR include a pipeline to convey Pure Water which has been extracted from the groundwater basins for indirect potable reuse to J. Will Johnson (JWJ) Reservoir, less than 1 mile away as shown in Attachment A-2. Adding new conveyance pipelines from Pure Water to JWJ supports a Pure Water to Central Basin connection, enabling the earliest opportunity for groundwater expansion in the West Coast Basin and Central Basin using Pure Water.

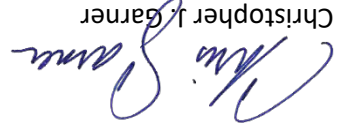
- **Port of Long Beach and West Long Beach Recycled Water Pipelines.** Long Beach Water is requesting the Pure Water EIR include an evaluation of pipelines necessary to convey Pure Water to the Port of Long Beach. Inclusion of these pipelines as part of the larger Pure Water environmental review will streamline the process for delivering Pure Water to industrial users. Long Beach Water is near completion on a feasibility study for these pipelines. A map of recommended pipeline configurations is included as Attachment A-3. Details can be provided once the study concludes in late 2022/early 2023.

Existing Long Beach Water Infrastructure

Long Beach Water has a significant amount of public water and sewer infrastructure that must continue to function as the Pure Water project progresses. We respectfully request the Pure Water project not impact any of these assets, as shown in Attachment B.

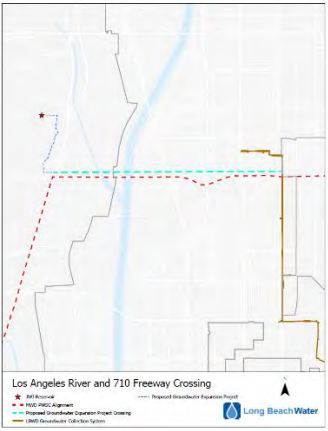
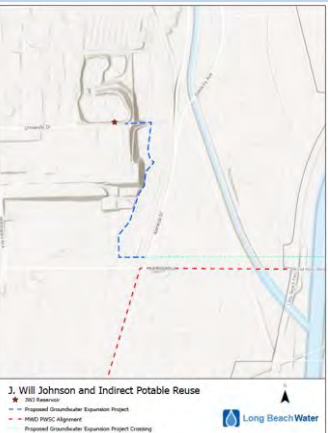
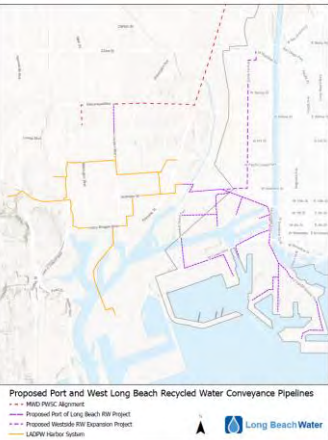
We look forward to continuing our partnership with MWD on the Pure Water project. If you have questions, please contact Diana Tang, Deputy General Manager at (562) 570-2302 or Diana.Tang@lbwater.org. Thank you for taking our scoping comments into consideration.

Sincerely,

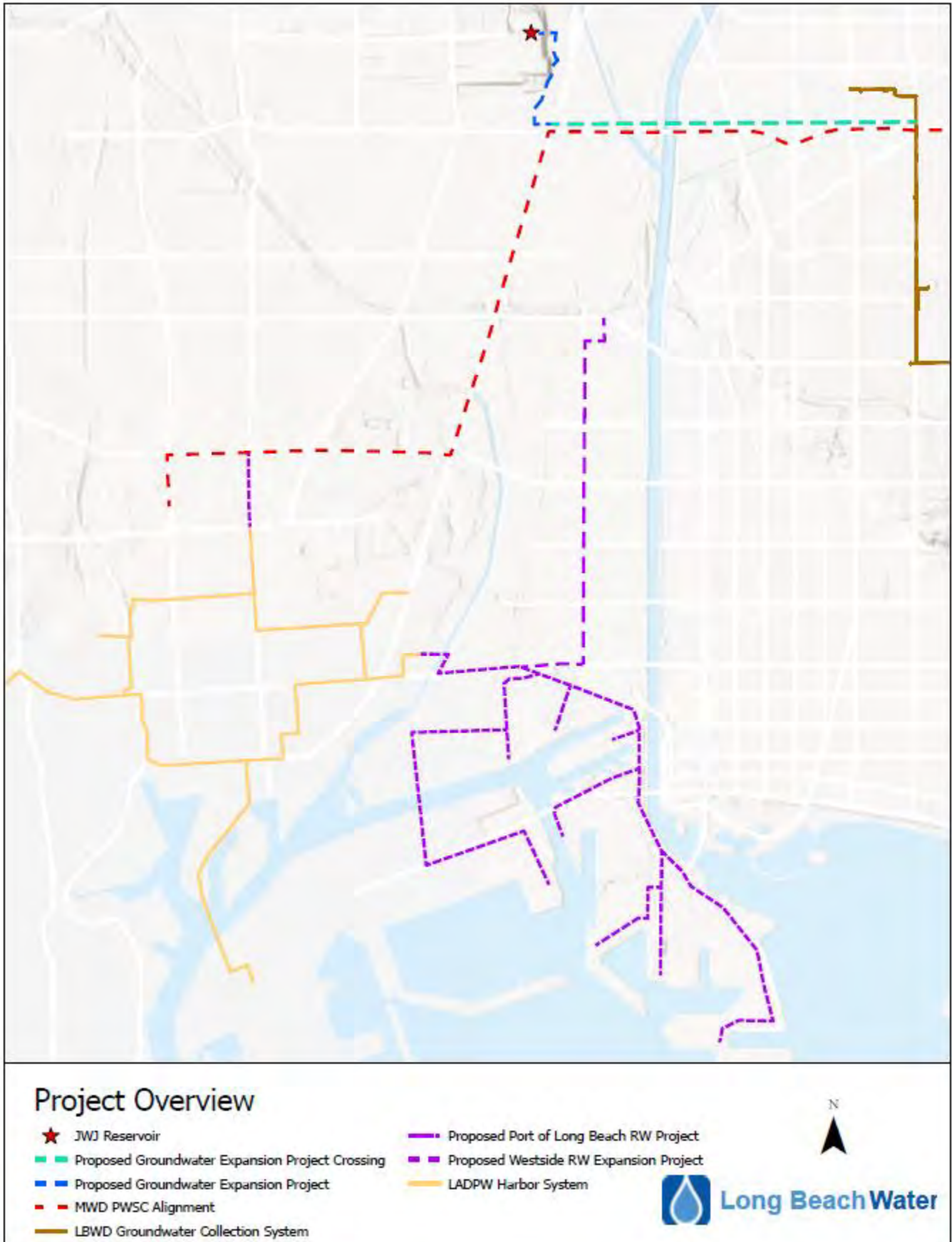


Christopher J. Garner
General Manager

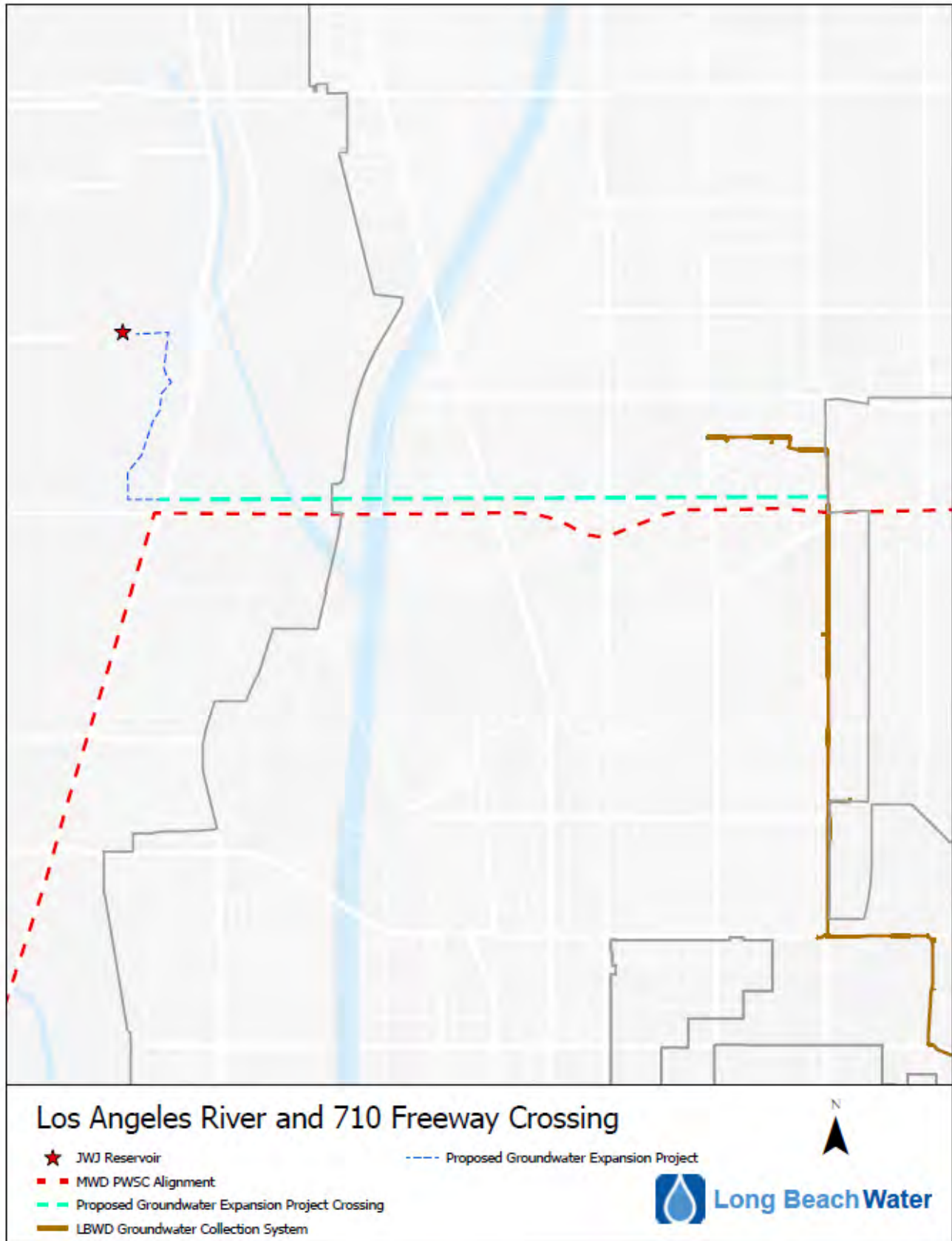
SUMMARY OF PRIMARY SCOPING COMMENTS AND SUGGESTIONS

EIR Scoping Focus Area				
Los Angeles River and 710 freeway crossing	<p>The proposed Pure Water pipeline crosses the Los Angeles River into the City of Long Beach at the 710-freeway and Del Amo Blvd; 0.7 miles northwest of the proposed Pure Water pipeline is the JWJ Reservoir</p>	<p>Long Beach Water is currently working with limited water supply options in west and north Long Beach. We would like to bring raw water (untreated groundwater) to JWJ Reservoir, which is on the west side of Long Beach. To do this, we need a pipeline that crosses the Los Angeles River and 710 freeway.</p> <p>A Los Angeles River crossing offers the earliest opportunity to inject Pure Water into Central Basin; and enables Long Beach to do groundwater augmentation and extraction in the Central and West Basin Coast groundwater basins.</p>	<p>Include in Pure Water EIR and design/build process, a pipe sleeve that Long Beach can use to move raw water across the Los Angeles River and 710 freeway.</p> <p>Also, include in Pure Water EIR, pipelines from 710-freeway and Del Amo Blvd, to JWJ Reservoir. To deliver Central Basin groundwater (augmented by Pure Water) to West Long Beach, we must have a way to get the groundwater to JWJ Reservoir so it can be gravity fed into the distribution system.</p>	
J. Will Johnson Indirect Potable Reuse Pipelines	<p>J. Will Johnson Reservoir is located 0.7 miles northwest of the proposed Pure Water pipeline</p>		<p>Include in Pure Water EIR, additional pipelines from 710-freeway and Del Amo Blvd, to JWJ Reservoir.</p>	
Port and West Long Beach Recycled Water Conveyance Pipelines				

ATTACHMENT A
Pure Water EIR Scoping Comments and Requests *from Long Beach Water*



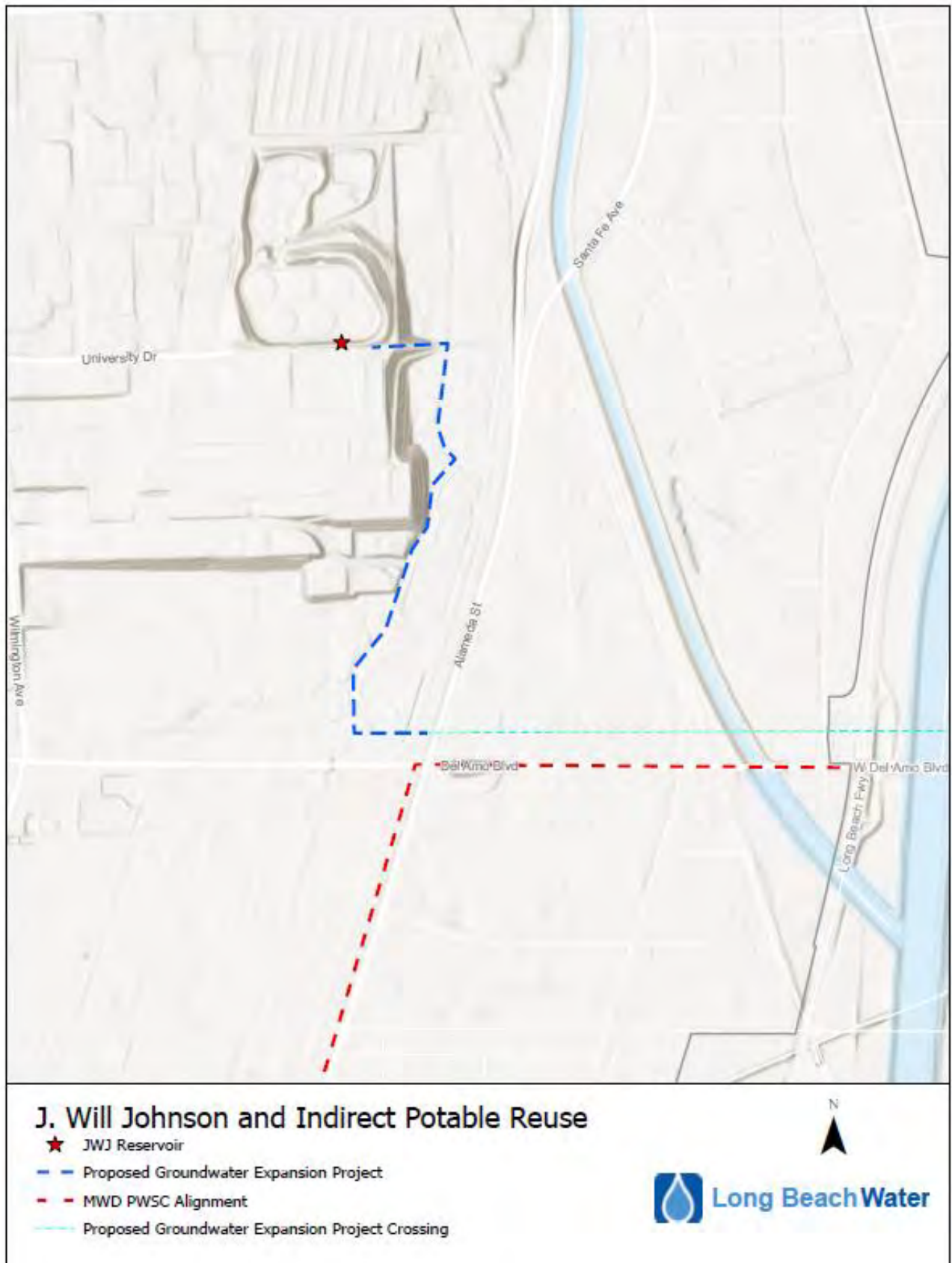
ATTACHMENT A-1
Los Angeles River and 710 Freeway Crossing
**Additional details can be provided upon request*



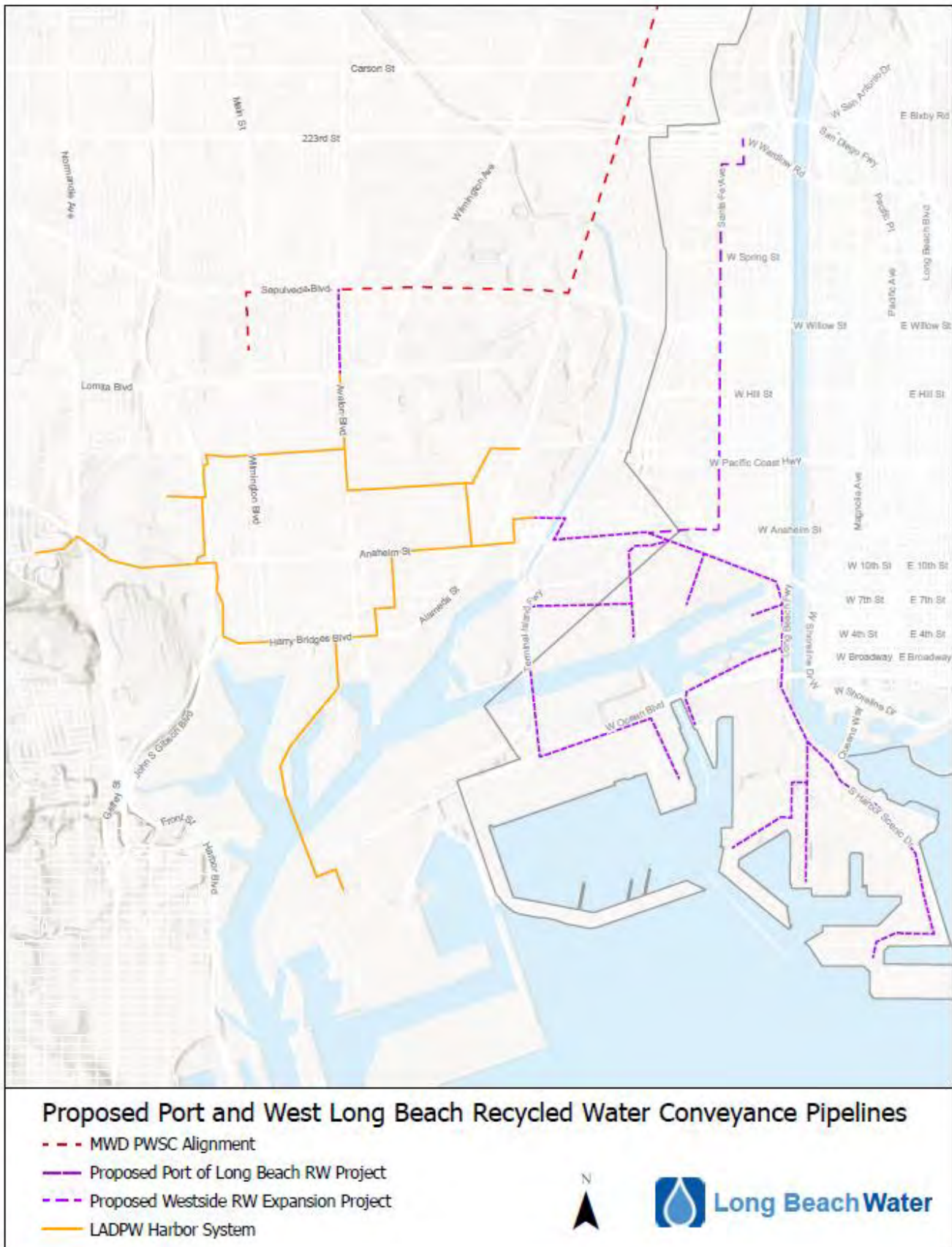
ATTACHMENT A-2

J. Will Johnson Conveyance Pipelines

**Additional details can be provided upon request*



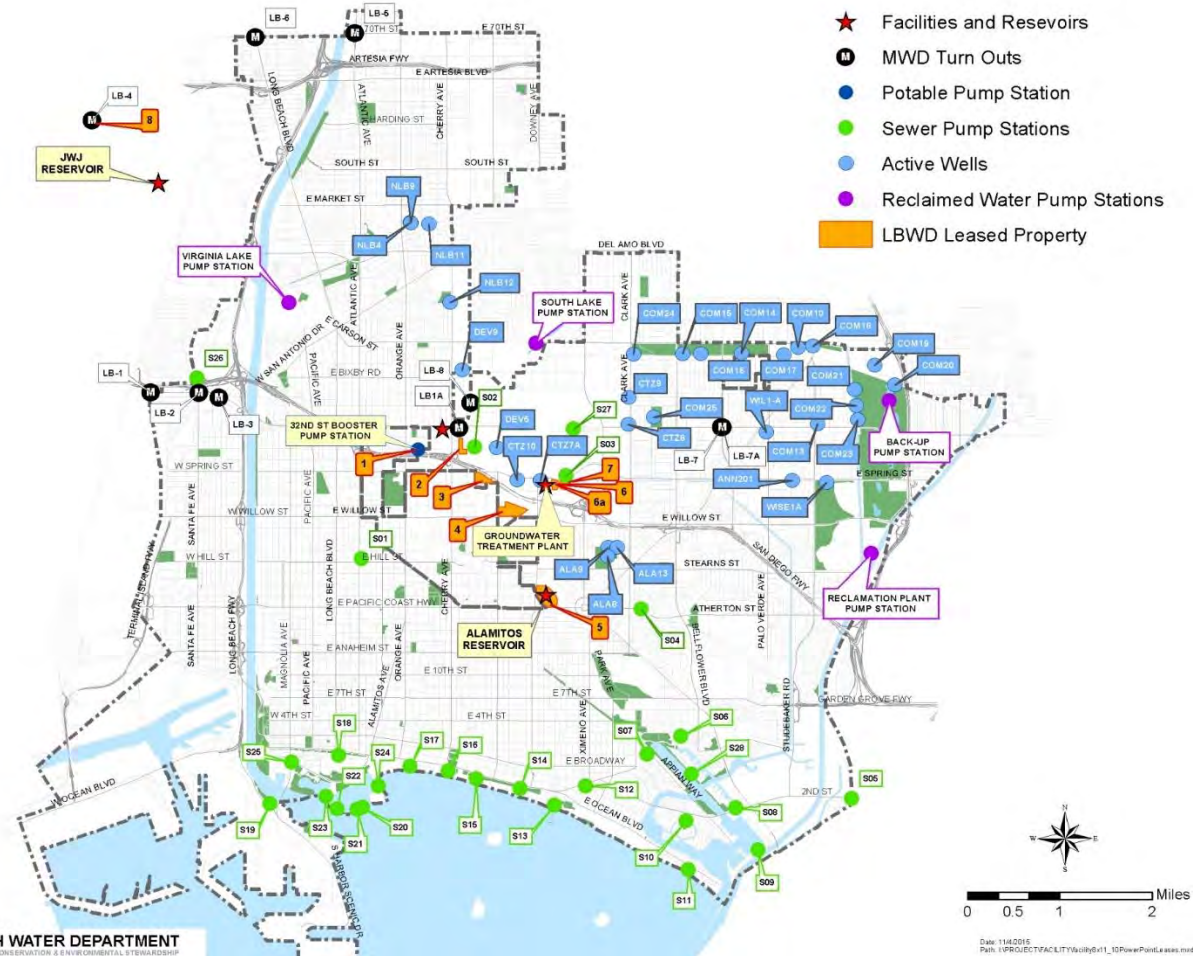
ATTACHMENT A-3 **Port and West Long Beach Recycled Water Conveyance Pipelines** **Additional details can be provided upon request*



ATTACHMENT B

Existing Long Beach Water and Sewer Infrastructure

**Additional details on any item listed on this map can be provided upon request*



Infrastructure owned and operated by Long Beach Water:

- Approx. 1500 miles of water lines
- Approx. 1200 miles of sewer lines
- Approx. 40 miles of recycled mains
- Approx. 20,000 valves
- Approx. 90,000 meters
- 24 Groundwater Wells
- 28 Sewer Pump Stations
- 3 Boosted Pressure Stations
- 1 Lake
- 36 storage tanks
- 8 MWD connections
- Groundwater Treatment Plant ~62



BUSINESS DEPARTMENT – Facilities Development & Planning
Office of the Executive Director
2425 Webster Avenue, Long Beach, CA 90810
(562) 997-7550 Fax (562) 595-8644

To: The Metropolitan Water District of Southern California
Environmental Planning Section
Attn: Ms. Ana Reyes

From: Long Beach Unified School District – Facilities

Subject: Response to Notice of Preparation

Re: Pure Water Southern California

Dear Environmental Planning Section,

Upon review of this Notice of Preparation, regarding the construction of an advanced water purification facility, the Long Beach Unified School District holds no comments or concerns for the MWD. Notwithstanding, the District remains an interested party and requests to remain informed on the project and looks forward to receiving a copy of the Draft EIR. The District appreciates the opportunity to provide input on the Draft EIR and to receive responses to comments.

The School District educates approximately 80,000 students, operates over 90 sites, and is currently the largest employer in the City of Long Beach. Therefore, water/wastewater treatment & reuse and drinking water quality remain a salient topic of discussion amongst our community and staff, along with minimizing any related environmental impacts.

Sincerely,

David Miranda
Executive Director, Facilities Development & Planning

Date

10.12.22



COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION

"Parks Make Life Better!"

Norma E. García-González, Director

Alina Bokde, Chief Deputy Director

November 14, 2022

Ms. Ana Reyes
Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, CA 90054-0153

Dear Ms. Reyes:

**NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT
PURE WATER SOUTHERN CALIFORNIA**

The Los Angeles County Department of Parks and Recreation (DPR) has reviewed the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the Pure Water Southern California Project (Proposed Project) proposed by the Metropolitan Water District of Southern California (MWD). The Proposed Project would include modifications to the existing Joint Water Pollution Control Plant (JWPCP), a new full-scale Advanced Water Purification facility located at the JWPCP, Direct Potable Reuse treatment facilities, pipelines, pump stations, service connections, groundwater recharge improvements, and operation, maintenance, and ancillary facilities. The Proposed Project could extend from the city of Carson to the city of Azusa in the north and as far east as the city of Upland in western San Bernardino County.

A Potential Source of Water Supply for DPR Operations

DPR manages more than 70,000 acres of parkland within the County of Los Angeles, including local and regional parks, as well as sensitive natural areas, trails and open spaces. The availability of water is vital to providing quality park access to our communities. However, due to factors associated with climate impacts, the resource is becoming scarcer and more expensive. Park facilities across the region are continuously challenged to adapt due to changes in water supplies, water usage restrictions, and rising time-of use rates. DPR is working on addressing these issues by improving existing water infrastructure to achieve the County's goal of reducing the environmental impacts associated with water consumption in the region and state. Having a sustainable source of water supply provided by the Proposed Project would be beneficial to DPR. Please clarify and confirm whether any DPR parks will be able to access or receive this water.

Potential Impacts on DPR Facilities

Construction and operation of the Proposed Project would require real property acquisitions in the form of temporary and permanent rights from public agencies including DPR, private utilities, and private landowners. Based on the project area map, the following DPR facilities may be affected by the Proposed Project, including, but not limited to those listed below. Specifically, DPR owns and operates a number of regional multi-use trails (equestrian, hiking, and mountain biking) within close proximity to the proposed Backbone Pipeline.

Multi-use Trails

- San Gabriel River Trail
- San Gabriel River Trail - Proposed
- San Gabriel River Trail – Lario Connector
- San Gabriel River Trail - Schabarum Connector
- San Gabriel River Trail - Eastern Bank
- Van Tassel Trail
- Bonelli Trail
- Marshall Canyon Trail
- Los Angeles River Trail
- Proposed Dominguez Channel Trail
- Rio Hondo River Trail
- Rooks Road Connector Trail
- Whittier Narrows Nature Center Trail
- San Gabriel River Trail Siphon Road Bike Path
- Rio Hondo River Trail- Walnut Grove Ave Connector
- San Jose Creek Trail

Parks and Other Recreational Facilities

- Bonelli Park (120 E Via Verde Dr, San Dimas, CA 91773)
- Santa Fe Dam Recreation Area (15501 E. Arrow Highway, Baldwin Park, CA 91706)
- Whittier Narrows Recreation Area (750 S. Santa Anita Ave., South El Monte, CA 91733)
- Blackwill Equestrian Park (10149 Rooks Road, Whittier, CA 90660)
- Whittier Narrows Nature Center (1000 S. Durfee Ave., South El Monte, CA 91733)
- Whittier Narrows Equestrian Center (12191 Rooks Road, Whittier, CA 90601)
- Workman Mill Road Staging Area (3301 Workman Mill Road, City Of Industry, CA 90601)
- Amigo Park (5700 S. Juarez Ave., Whittier, CA 90606)
- Lakewood Golf Course (3101 Carson Blvd., Lakewood, CA 90712)

- Lario Staging Area (15701 Foothill Blvd. Azusa, CA 91010)

For locations of DPR parks and multi-use trails, please download and review the files “DPR Park Facilities” and “Countywide Multi-Use Trails” from the Los Angeles County GIS Data Portal. (<https://egis-lacounty.hub.arcgis.com/>).

To address potential impacts on existing recreational resources, the DEIR should include mitigation measures that would ensure that future impacts to parks, open space, and recreation lands are minimized. MWD must notify DPR in advance of the nature, extent, and duration of construction activities that may affect parks, trails, and other facilities operated and maintained by DPR. Interim updates should be provided to inform DPR of the status of the construction activities. Any work affecting existing DPR facilities may require a Right-of-Entry Permit. Requests for Right-of-Entry Permits should be sent to permit-license-agreement@lacounty.onmicrosoft.com.

Park Preservation Act

Please note that DPR facilities are protected under the California Public Park Preservation Act of 1971, which ensures no net loss of public parkland and facilities. The Act requires the County to either receive payment and/or replacement property whenever park land is acquired by another public entity for non-park purposes. In the event that any DPR park land and facilities are acquired, DPR shall acquire substitute park land and facilities. If, however, less than 10 percent of the park land, but not more than one acre, is acquired, DPR may, instead of acquiring substitute park land and facilities, improve the unacquired portion of the park land and facilities, using the funds received for this purpose, after holding a public hearing on the matter and upon a majority vote of the Los Angeles County Board of Supervisors.

In addition, some DPR facilities may also have permanent protections by deed restrictions. This includes DPR facilities that received funding from the federal Land and Water Conservation Fund (LWCF) for parkland acquisition and/or improvements, which is separate and in addition to the Park Preservation Act.

Los Angeles Countywide Parks and Recreation Needs Assessment

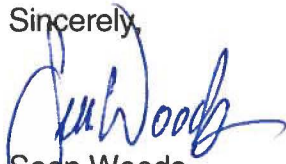
DPR recently completed and released for public review the draft 2022 Los Angeles Countywide Parks Needs Assessment Plus (PNA+) Report (<https://lacountyparkneeds.org/pnaplus-report/>), which builds upon and updates the 2016 version with data about access to regional parks, natural areas and open space, trails, beaches and lakes, and local parks in rural areas, as well as analyses related to population vulnerability, environmental benefits, and environmental burdens.

Ms. Ana Reyes
November 14, 2022
Page 4

A number of indicators of ecosystem impact were used in the PNA+ analysis to determine the level of environmental burden experienced by lands in Los Angeles County, including contamination of groundwater and drinking water. Areas that bear the greatest environmental burdens include numerous communities in Central LA, East LA, South LA, Southeast LA, and the San Gabriel Valley, where the Proposed Project is located. These vulnerable areas are also areas with very high and high park needs identified in the 2016 PNA, stressing the need for additional water sources to provide quality park access. The Proposed Project, which would provide potable and non-potable water, as well as groundwater recharge improvements and other improvements, would provide great benefits to the Southern California region with a new source of sustainable water supply.

Thank you for including DPR in the review of this document. If you have any questions, please contact Jui Ing Chien of my staff at (626) 588-5317 or jchien@parks.lacounty.gov.

Sincerely,



Sean Woods
Chief of Planning

SW:CL:JIC:ev

c: Parks and Recreation (C. Lau, A. Vona, M. O'Connor, N. Krakowiak, J. Chien, D. Thorne)



MARK PESTRELLA, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

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

November 9, 2022

IN REPLY PLEASE

REFER TO FILE:

LD-4

Ms. Ana Reyes
The Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, CA 90054-0153

Dear Ms. Reyes:

**ENVIRONMENTAL PLAN (RPPL2022011205)
NOTICE OF PREPARATION
OF A DRAFT ENVIRONMENTAL IMPACT REPORT
PURE WATER SOUTHERN CALIFORNIA**

As requested, Public Works has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Pure Water Southern California project. The project proposes a partnership between the Metropolitan Water District of Southern California and the Los Angeles County Sanitation Districts to beneficially reuse cleaned wastewater that currently is being discharged to the Pacific Ocean from the Los Angeles County Sanitation Districts' Joint Water Pollution Control Plant in the City of Carson.

We offer the following comment for your consideration:

1. General Comment

- 1.1. The Notice of Preparation and subsequent California Environmental Quality Act document need to address the future operation and maintenance the project would have on:
 - 1.1.1. Biologic Resources (vegetative growth within groundwater recharge facilities).
 - 1.1.2. Energy (added vehicle use gate activity).
 - 1.1.3. Greenhouse Gas Emissions (added heavy equipment use to operate and maintain).

- 1.1.4. Hazardous Material (added use of gasoline/diesel with heavy equipment).
- 1.1.5. Hydrology (adding 155,000-acre feet of highly treated reclaimed water annually to region).
- 1.2. Indicate if there will be an initiation of National Environmental Policy Act processes considering Federal land is likely to be involved.
- 1.3. The project needs to address any loss of percolation to groundwater recharge facilities due to equipment installed as part of the distribution system.
- 1.4. If there is a breakdown available for targeted recharge quantities, per facility or groundwater basin, please make the following considerations:
 - 1.4.1. Have spreading grounds along the planned Direct Potable Reuse Pipeline.
 - 1.4.2. Irwindale, Citrus, Ben Lomond, and Forbes spreading basins may be worth looking at to reduce downtime and increase operational flexibility in the redirection of stormwater percolation.
- 1.5. Any change to the Federal Emergency Management Agency Special Flood Hazard Area boundary or rise in the Base Flood Elevation will warrant a Conditional Letter of Map Revision. If a Conditional Letter of Map Revision is needed, the floodplain manager for that City will need to be contacted to determine the National Flood Insurance Program compliance requirements for that portion of the project.

For questions regarding comments 1.1-1.5, please contact Rudy Rivera of Public Works, Stormwater Engineering Division, at (626) 458-6147 or rrivera@pw.lacounty.gov.

- 1.6. Any work within Los Angeles County Flood Control District (LACFCD) right of way or affecting LACFCD facility will require a LACFCD permit through epicla.lacounty.gov.

For questions regarding comment 1.6, please contact Melissa Turcotte of Public Works, Stormwater Quality Division, at (626) 300-4670 or mturcotte@pw.lacounty.gov.

Ms. Ana Reyes
November 9, 2022
Page 3

If you have any questions or require additional information, please contact Toan Duong of Public Works, Land Development Division, at (626) 458-4921 or tduong@pw.lacounty.gov.

Very truly yours,

MARK PESTRELLA, PE
Director of Public Works

for 

ARTHUR VANDER VIS, PE
Assistant Deputy Director
Land Development Division

DK:la

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DIRECTORS

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**ORANGE COUNTY WATER DISTRICT**

ORANGE COUNTY'S GROUNDWATER AUTHORITY

OFFICERS

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First Vice President
CATHY GREEN

Second Vice President
TRI TA

General Manager
MICHAEL R. MARKUS, P.E., D.WRE

November 14, 2022

Ms. Ana Reyes
The Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, CA 90054-0153

Submitted via email to: EP@mwdh2o.com

Subject: Orange County Water District's comments on the Notice of Preparation of a Draft Environmental Impact Report for the Metropolitan Water District of Southern California Pure Water Southern California Project

Dear Ms. Reyes,

The Orange County Water District (OCWD or District) appreciates the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the Metropolitan Water District of Southern California's (Metropolitan) Pure Water Southern California Project (Project). OCWD is a special district formed in 1933 by an act of the California Legislature. The District manages the groundwater basin that underlies north and central Orange County. Water produced from the basin is the primary water supply for approximately 2.5 million residents living within the District's Boundaries.

It is OCWD's understanding that the Pure Water Southern California Project is a partnership between Metropolitan and the Los Angeles County Sanitation Districts (Sanitation Districts) at the Joint Water Pollution Control Plant (JWPCP) in Carson, CA to develop and implement a regional recycled water program. Once complete this Project would produce approximately 150 million gallons per day (MGD) of sustainable, high-quality water for indirect and direct potable reuse through the new Advance Water Purification (AWP) facility. This Project will also involve construction of two new pipelines to convey produced water from the AWP. The first pipeline will convey water from the JWPCP facilities in Carson to the existing San Gabriel Canyon Spreading Grounds in the city of Azusa. The second pipeline will head eastward from the spreading grounds to the Weymouth Water Treatment Plant. From here it could forego the treatment facility and be diverted into Orange County for indirect potable reuse by recharging the Orange County Groundwater Basin. As a potential end user of the water produced by this Project, OCWD would like to provide the following comments that should be evaluated in the Draft EIR.

New Percolation Basin in Orange County

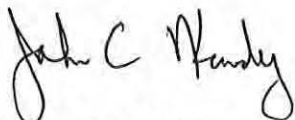
OCWD has various percolation basins that are managed primarily to maximize recharge of stormflows diverted from the Santa Ana River. OCWD's recharge basins also intermittently recharge imported water. For the District to accommodate a steady year-round flow from the Project an additional recharge basin would need to be constructed and dedicated to this source of water. OCWD recommends that the Draft EIR include an evaluation of the construction and maintenance of a new recharge basin in Orange County that could be dedicated to percolate flows from this Project. This new recharge basin should be sized to reasonably accommodate the peak flows anticipated to be delivered to Orange County.

Evaluation of Groundwater Quality Objectives

The Draft EIR should also evaluate the project's impact on the groundwater quality objectives in the basins that the recycled water would be recharged into. The Orange County Management Zone identified in the Regional Board's Basin Plan has water quality objectives for nitrate as nitrogen and total dissolved solids (TDS) of 3.4 mg/L and 580 mg/l respectively.

If you have any questions, please contact Kevin O'Toole at (714) 378-8248 or kotoole@ocwd.com

Sincerely,



For Michael R. Markus, P.E., D.WRE, BCEE, F.ASCE
General Manager

From: [Gregory Reed](#)
To: rsoni@mwadh2o.com; purewater@mwadh2o.com; [Reyes, Ana M](#); ep@mwadh2o.com; [PureWater Comments](#)
Subject: Re: EIR Scoping Comments - Gregory Reed
Date: Monday, November 14, 2022 2:11:20 PM

For your reference, the following was submitted.

EIR Scoping Comments

Name	Gregory Reed
Organization (optional)	West Basin MWD
Address (optional)	Street Address: 17140 Avalon Blvd City: Carson State / Province: California Postal / Zip Code: 90746
Phone Number (optional)	(310) 744-5690
Email. We'll use your email address to send you a copy of your responses and comments.	GregoryR@westbasin.org
Would you like to be added to our email list for this project?	Yes
Please provide your comments.	<p>Dear Ms. Ana Reyes:</p> <p>Thank you for the opportunity to submit comments regarding the Notice of Preparation of an Environmental Impact Report (EIR) for the Pure Water Southern California Program.</p> <p>West Basin Municipal Water District (West Basin) is a Metropolitan Member Agency responsible for serving potable water to nearly 1 million residents in Los Angeles County and supplying recycled water for groundwater replenishment and various non-potable uses. West Basin commends Metropolitan for their leadership with developing this new water recycling program that is critical to our region.</p> <p>West Basin enjoys a long-standing partnership with Metropolitan and City of Los Angeles in developing its water recycling systems. This partnership has resulted in facilities that have produced approximately 295 billion gallons per day of high-quality recycled water at our Edward C. Little Treatment Plant. West Basin's recycled water treatment facilities, distribution systems, and storage capabilities</p>

provide valuable infrastructure that contributes to the regional network of recycled water in Los Angeles County. West Basin is committed to continuing these partnerships to ensure continued development of sustainable high-quality recycled water supplies for the region.

As the Pure Water Southern California Program is developed, we hope to partner with Metropolitan in a way that accelerates our common goals of water supply reliability, regional benefits, and cost effectiveness of regional infrastructure investments. We commend your leadership and look forward to the successful completion of this critically important program.

Sincerely,
Gregory Reed
General Manager of West Basin MWD

You can [edit this submission](#) and [view all your submissions](#) easily.



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

May 20, 2024

Ms. Ana Reyes
Environmental Planning Section
The Metropolitan Water District of Southern California
P.O. Box 54153
Los Angeles, CA 90054-0153

Sent by Email: EP@mwdh2o.com

RE: Pure Water Southern California
Notice of Preparation of a Draft Environmental Impact Report, September 2022

Dear Ms. Reyes:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Pure Water Southern California (Project) located throughout Los Angeles County (Los Angeles).

The Project alignment is adjacent to or will cross Metro Rail and Metrolink facilities, services, and right-of-way (ROW). The purpose of this letter is to advise the Metropolitan Water District of Southern California (MWD; "Project Sponsor") of the Project's potential impacts on Metro infrastructure, operations, and public safety based on the Notice of Preparation of a Draft Environmental Impact Report (EIR). Metro is providing recommended topics of study for the EIR concerning issues that are germane to our agency's statutory responsibility in relation to the Metro-owned right-of-way (ROW), which may be affected by the proposed Project.

Project Description

Pure Water Southern California (formerly called the Regional Recycled Water Program) is a proposed partnership between Project Sponsor and the Los Angeles County Sanitation Districts (Sanitation Districts) to beneficially reuse cleaned wastewater that currently is being discharged to the Pacific Ocean from the Sanitation Districts' Joint Water Pollution Control Plant (JWPCP) in the city of Carson. The cleaned wastewater would be purified through a new Advanced Water Purification facility constructed on undeveloped property within the JWPCP to produce approximately 150 million gallons per day of purified water. This purified water would then be transported via new conveyance facilities as far north as the city of Azusa and as far east as the city of Upland to new or existing water distribution facilities.

Recommendations for EIR Scope and Content

Responsible Agency Status

Per Section 15381 of the CEQA Guidelines (14 Cal. Code of Regulations, div. 6, ch. 3), a “Responsible Agency” is “a public agency which proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA, the term ‘Responsible Agency’ includes all public agencies other than the Lead Agency which have discretionary approval power over the project.” Metro may need to approve permits, clearances, or agreements necessary to carry out portions of the Project, in particular for facilities constructed below and adjacent to Metro’s property. Therefore, Metro anticipates that we will be a Responsible Agency for the purposes of the preparation of this EIR and may rely on the EIR for its future approvals.

It is recommended that Metro is a listed agency for permits approval, as Metro would need to review and approve a license agreement and/or easements for the proposed facilities constructed below and adjacent to Metro’s property.

Crossing Locations

The Project’s alignment would cross Metro Rail and Metrolink facilities, services, or ROW at the locations listed in Table 1. The discussion below will refer to each crossing location by the “Crossing No.” listed in the table.

Table 1: LA Metro & Metrolink Crossing Locations (List as of May 2024)

Crossing No.	Crossing Location	City	Line	Fee Owner	Other Infrastructure	Proposed Method of Project Construction
1	Main Street (1200 ft south of Sepulveda Blvd)	Carson	Freight ROW	The proposed crossing is within Main Street corridor, a public street, Metro owns the rail corridor in this area and crosses Main Street on an aerial structure.	BNSF Operated	Trenchless
2	Del Amo (East of Santa Fe Ave)	Carson and Unincorporated	Metro A Line ROW (Elevated)	The proposed crossing is within Del Amo Boulevard corridor, a public street,	UP Freight Tracks, owned and operated	Open Cut

				Metro owns the elevated rail corridor in this area and crosses Del Amo Boulevard on an aerial structure.		
3	91 Freeway and San Gabriel River	Bellflower	Future Metro Southeast Gateway Line (at Grade)	Metro & Caltrans	Freeway	Trenchless
4	105 Freeway at San Gabriel River	Norwalk	Metro C Line (Elevated)	Caltrans	Freeway	Trenchless
5	Slauson Avenue (Near 605 Freeway)	Whitter	Metrolink Orange County Line (at Grade)	BNSF	Metrolink Operating ROW	Trenchless
6	Between San Gabriel River & 605 Freeway at Tracks	Unincorporated	Metrolink Riverside Line (at Grade)	UP	Bridge	Trenchless
7	Between San Gabriel River & 605 Freeway at Tracks	Unincorporated	Metrolink San Bernadino Line (at Grade)	UP	Bridge	Trenchless
8	Duarte Rd at Hope Drive to 210 Freeway	Duarte	Metro A Line (at Grade)	Metro	Freeway, Bridge, others	Open Cut

Southeast Gateway Line – Future Metro Rail Project

Crossing No. 3 will cross Metro-owned ROW to be used for the planned Southeast Gateway Line. The Southeast Gateway Line project is a 14.5-mile corridor that Metro is evaluating for a new light rail transit (LRT) line that would connect Slauson Station (A Line) in southeast LA County to Pioneer Station in Artesia. The board selected Los Angeles Union Station as the northern terminus for the project and directed staff to conduct a separate study to evaluate option for connecting from Slauson Station (A Line). FTA is expected to issue its Record of Decision in July 2024. Metro will then advance design and other pre-construction activities. Construction is anticipated to begin in 2026 with project opening in 2035. Metro encourages the Project team to coordinate closely with the Southeast Gateway Line project team to ensure compatibility of design and potentially concurrent construction activities. More project information is available at <https://www.metro.net/projects/southeastgateway/>.

Metro Rail Adjacency

1. Rail Operations: The Metro A and C Lines currently operate weekday peak service as often as every 8 minutes on the A Line and 10 minutes on the C Line in both directions. Trains may operate in and out of revenue service, 24 hours a day, seven days a week, in the ROW adjacent to the Project.
2. Impact Analysis: Due to the Project's proximity to the Metro A and C Line ROW, the EIR must analyze potential effects on light rail operations and identify mitigation measures as appropriate. Critical impacts to be studied should include (without limitation): impacts of Project construction and operation on and potential damage to the structural and systems integrity of tracks and related infrastructure; disruption to light rail service; rail crossing safety for pedestrians and vehicles; temporary and/or permanent changes to customer access and circulation to the station; and noise and vibration. Specific impacts and mitigation measures that should be studied include:
 - a. Disturbance to Light Rail Structural Support: The Project includes excavation and construction of underground structures. Tiebacks supporting these structures have the potential to disturb adjoining soils and jeopardize support of the light rail tracks.

Recommended mitigation measures:

- i. Technical Review: The Project Sponsor shall submit engineering drawings and calculations, as well as construction work plans and methods, to evaluate any impacts to the Metro A and C Line infrastructure in relationship to the Project. Before issuance of any building permit for the Project, the Project Sponsor shall obtain Metro's approval of final construction plans.
- ii. Construction Safety: The construction and operation of the Project shall not disrupt the operation and maintenance activities of the Metro A and C Lines or the structural and systems integrity of Metro's light rail infrastructure. Not later than two months before Project construction, the Project Sponsor

shall contact Metro to schedule a pre-construction meeting with all Project construction personnel and Metro Real Estate, Construction Management, and Construction Safety staff. During Project construction, the Project Sponsor shall:

1. Work in close coordination with Metro to ensure that ROW and Station access, visibility, and structural integrity are not compromised by construction activities or permanent build conditions;
 2. Construct a protection barrier to prevent objects, material, or debris from falling onto the ROW;
 3. Notify Metro of any changes to construction activities that may impact the use of the ROW;
 4. Permit Metro staff to monitor demolition and/or construction activity(ies) to ascertain any impact to the Metro A and C Line ROW.
- b. At-Grade and Elevated Crossings: Crossings No. 2, 4, and 8 are adjacent to Metro A and C Lines ROW and Crossing 1 is adjacent to Metro-owned ROW operated and maintained by freight operator BNSF Railway. The Project Sponsor is advised that rail service operates in and out of revenue service, 24 hours a day, seven days a week, in the ROW adjacent to the project. The rail crossings are regulated by the California Public Utilities Commission (CPUC) and maintained by Metro.

Recommended mitigation measure: The Project Sponsor shall analyze traffic, safety, and proposed construction method impacts and comply with all regulations and requirements of the California Public Utilities Commission (CPUC) and freight operators with respect to the Project's potential impacts on the at-grade rail crossings. CPUC and freight operators may have additional comments and requirements regarding this Project and should be contacted in consultation efforts.

- c. Overhead Catenary System (OCS) Setback: Overhead catenary wires and support structures adjacent to the Project power Metro trains on the A and C Lines. OCS wires should be treated like any high voltage electrical utility wires. The Project's construction activities are proposed to be in close proximity to the OCS and can pose an electrocution hazard during Project construction and operation.

Recommended mitigation measures:

- i. Technical Review: The Project Sponsor shall submit engineering drawings and calculations, as well as construction work plans and methods including any crane placement and radius, to evaluate any impacts to the Metro A and C Line infrastructure in relationship to the Project. Before issuance of any

building permit for the Project, the Project Sponsor shall obtain Metro's approval of final construction plans.

- ii. OCS Protection: The Project Sponsor shall take all necessary measures to protect the OCS from damage due to Project activities during and after construction, pursuant to applicable California Department of Industrial Relations regulations (Cal. Code of Regulations, Title 8). The Project Sponsor shall post proper signage for equipment working around the OCS wires. During Project construction, the Project Sponsor shall take precautions to protect in place all poles and underground infrastructure and maintain access for Metro personnel to service them at all times.
- iii. Construction Safety: The construction and operation of the Project shall not disrupt the operation and maintenance activities of the Metro A and C Lines or the structural and systems integrity of Metro's light rail infrastructure. Not later than two months before Project construction, the Project Sponsor shall contact Metro to schedule a pre-construction meeting with all Project construction personnel and Metro Real Estate, Construction Management, and Construction Safety staff. During Project construction, the Project Sponsor shall:
 - 1. Work in close coordination with Metro to ensure that Station access, visibility, and structural integrity are not compromised by construction activities or permanent build conditions;
 - 2. Construct a protection barrier to prevent objects, material, or debris from falling onto the ROW;
 - 3. Notify Metro of any changes to construction activities that may impact the use of the ROW;
 - 4. Permit Metro staff to monitor demolition and/or construction activity(ies) to ascertain any impact to the Metro A and C Line.
 - 5. Apply for and obtain approval from Metro for any special operations, including the use of a pile driver or any other equipment that could come into close proximity to the OCS or support structures, not later than two months before the start of Project construction.
- 3. Advisories to Project Sponsor: The Project Sponsor is encouraged to contact Metro Development Review early in the design process to address potential impacts. The Project Sponsor should also be advised of the following:
 - 1. Occupational Safety and Health Administration (OSHA) Requirements: Demolition, construction and/or excavation work in proximity to Metro ROW with potential to damage light rail tracks and related infrastructure may be subject to additional OSHA safety requirements.
 - b. Technical Review: Metro charges for staff time spent on engineering review and construction monitoring.

- c. ROW Entry Permit: For temporary or ongoing access to Metro ROW for demolition, construction, and/or maintenance activities, the Project Sponsor shall complete Metro's Track Allocation process with Metro Rail Operations and obtain a Right of Entry Permit from Metro Real Estate. Approval for single tracking or a power shutdown, while possible, is highly discouraged; if sought, the Project Sponsor shall apply for and obtain such approval from Metro not later than two months before the start of Project construction.
- d. Cost of Impacts: The Project Sponsor will be responsible for costs incurred resulting from Project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure, including single-tracking or bus bridging around closures. The Project Sponsor will also bear all costs for any noise mitigation required for the Project.
- e. Maintenance: For maintenance activities that will require access to Metro property, the Project Sponsor must obtain a Temporary Right of Entry Permit before accessing property and coordinate activities through Rail Operations Track Allocation process, as discussed above.

Metrolink Adjacency

- 1. Operations: Crossings No. 5, 6, and 7 are adjacent to Southern California Regional Rail Authority (SCRRA) or Metrolink commuter rail operating ROW. The Project Sponsor is advised that rail service operates in both directions and that trains may operate 24 hours a day, seven days a week, in the ROW adjacent to the Project. Metro encourages the Project Sponsor to contact Metrolink at RightofEntry@scrra.net to begin coordination. There are at-grade rail crossings in close proximity to the Project at the listed location below.
- 2. Impact Analysis: Due to the Project's proximity to Metrolink ROW, the EIR must analyze potential effects on rail operations and identify mitigation measures as appropriate. Critical impacts to be studied should include (without limitation): impacts of Project construction and operation on and potential damage to the structural and systems integrity of tracks and related infrastructure; disruption to rail service; potential limitations to expansion of rail service and rail crossing safety for pedestrians and vehicles.
 - a. Underground Structures: The Project includes excavation and construction of underground structures. Tiebacks supporting these structures have the potential to disturb adjoining soils and jeopardize support of the rail tracks. Such conflicts can occur during Project construction and/or operation. The Project Sponsor will generally not be permitted to access Metrolink ROW to maintain the Project. Follow Metrolink design criteria for underground structures to include the costs for encasement for the entire railroad right-of-way in the planning of this program.

Recommended mitigation measures:

- ii. Technical Review: The Project Sponsor shall submit engineering drawings and calculations, as well as construction work plans and methods including any crane placement and radius, to evaluate any impacts to the Metrolink Orange County, Riverside, and San Bernardino Line's infrastructure in relationship to

the Project. Before issuance of any building permit for the Project, the Project Sponsor shall obtain SCRRA's approval of final construction drawings.

- iii. Access: Any access to railroad property is strictly at the discretion of Metro and SCRRA. The Project Sponsor shall obtain specific Right-of-Entry temporary access permits from SCRRA for any work performed on the Project's structures or property requiring access to the railroad ROW. Metrolink requires RWS training certification from all personnel entering onto the railroad right-of-way they operate on.
- iv. Construction Monitoring: The Project Sponsor shall permit Metro and/or SCRRA staff to monitor construction activity to ascertain any impact to the ROW. During construction, the Project Sponsor shall construct a protection barrier to prevent objects, material, or debris from falling onto the ROW. The Project Sponsor shall notify Metro and SCRRA of any changes to the construction/building plans that may or may not impact the ROW.
- b. At-Grade Crossings: Crossings No. 5, 6 and 7 are at-grade rail crossings in close proximity to the Project. This rail crossing is regulated by the California Public Utilities Commission (CPUC). CPUC may have additional comments and requirements regarding this Project and should be contacted in consultation efforts.

Recommended mitigation measure: The Project Sponsor shall analyze safety impacts and comply with all regulations and requirements of the California Public Utilities Commission (CPUC) with respect to the Project's potential impacts on the at-grade rail crossings. CPUC may have additional comments and requirements regarding this Project and should be contacted in consultation efforts.

- 3. Advisories to Project Sponsor: The Project Sponsor is encouraged to contact Metro Development Review and Metrolink staff early in the design process to plan for potential impacts. The Project Sponsor should also be advised of the following:
 - a. Occupational Safety and Health Administration (OSHA) Requirements: Demolition, construction and/or excavation work in proximity to Metrolink ROW with potential to damage rail tracks and related infrastructure may be subject to additional OSHA safety requirements.
 - b. Technical Review: Metro and Metrolink charge for staff time spent on engineering review and construction monitoring.
 - c. ROW Access: The Project Sponsor should contact SCRRA for Right-of Entry requirements. Information can be found at www.metrolinktrains.com. Other requirements may include permits for construction of buildings and any future repairs, painting, etc., including the use of overhead cranes or any other equipment that could potentially impact railroad operations and safety. Frequent access for ongoing maintenance tasks will necessitate an active license agreement. This agreement will include an annual license fee and other requirements that meet safety standards for access to a ROW with active rail operations.

- d. Cost of Impacts: The Project Sponsor will be responsible for costs incurred by Metro and/or SCRRA due to Project construction/operation issues that cause delay or harm to Metrolink service delivery or infrastructure. The Project Sponsor will also bear all costs for any noise mitigation required for the Project.

In addition to the specific comments outlined above, Metro is providing the Project Sponsor with the Metro Adjacent Development Handbook which provides an overview of common concerns for projects adjacent to Metro-owned right-of-way (ROW) and transit facilities, available at <https://www.metro.net/devreview>.

Should you have any questions regarding this letter, please contact me by phone at 213-547-4246, or email at devreview@metro.net.

Sincerely,



Beatris Megerdichian
Principal Transportation Planner, Development Review Team
Transit Oriented Communities

cc: Shine Ling, Director, Development Review Team

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/devreview>.

Tribes



Fernandeno Tataviam Band of Mission Indians

Tribal Historic & Cultural Preservation Department
Environmental Protection Division

Rudy J. Ortega, Jr.
Tribal President

*Tribal Historic & Cultural
Preservation Committee*

Lucia Alfaro
Chairperson
Richard Ortega
Jesus Alvarez

November 14, 2022

The Metropolitan Water District of Southern California
Environmental Planning Section
700 North Alameda Street
Los Angeles, California 90012

Sent via Soni, Rupam: RSoni@mwdh2o.com

RE: Notice of Preparation of a Draft Environmental Impact Report: Pure Water Southern California

Dear Ms. Ana Reyes,

On behalf of the Environmental Protection (EP) Division of the Fernandeno Tataviam Band of Mission Indians' ("FTBMI") Tribal Historic and Cultural Preservation Department, thank you for the opportunity to review and comment on the NoP of the Draft EIR for the Pure Water Southern California project ("Project"). EP Division has provided its review of the project and does not wish to provide any scoping comments to NoP at this time. However, our office would like to express support for the Pure Water Southern California program and the program's effort to diversify region's water supply by harvesting, purifying and reusing wastewater to achieve resiliency and address the severe drought that the region is facing.

The EP Division requests to be notified with future Project notifications. Please feel free to contact me via email at kristina.kreter@tataviam-nsn.us

Respectfully,

Kristina Kreter
Programs Manager
Tribal Historic and Cultural Preservation Department

From: [Quechan Historic Preservation](#)
To: [EPT](#)
Subject: Pure Water Southern California
Date: Monday, October 17, 2022 1:13:47 PM

This email is to inform you that we do not wish to comment on this project. We defer to the more local Tribes and support their determinations on this matter.

H. Jill McCormick, M.A.
Historic Preservation Officer
Ft. Yuma Quechan Tribe
P.O. Box 1899
Yuma, AZ 85366
Office: 760-572-2423
Cell: 928-261-0254



Virus-free www.avast.com

Ana Reyes
Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, CA 90054-0153
electrónico: ep@mwdh2o.com

RE: Pure Water Southern California, Notice of Preparation (NOP)

Dear Ana Reyes,

Thank you for the opportunity to submit these comments on the Notice of Preparation (NOP) for Pure Water Southern California. This letter uplifts some perspectives and concerns of the Gabrieleño Tongva San Gabriel Band of Mission Indians and broader Tongva community members.

Having cultural and historic sites located throughout Los Angeles County, we request that the EIR provide an assessment of potential impacts related to Tribal Cultural Resources (TCRs) that could result from implementing the Pure Water Project. We request consultation and communication to engage throughout planning and implementation. Our community recognizes water as a cultural spiritual resource and a living relative we have a moral obligation to care for. We are concerned explicitly with the damage and harm posed to the San Gabriel River and its surrounding tributaries.

While we acknowledge and appreciate the time and effort that went into facilitating our first meeting on July 14, 2022, we would encourage the MWD to continue to reflect on opportunities to engage with local tribal communities. We recommend collaboratively developing a set of minimum standards for consultation that go beyond the CEQA requirements to build a relationship that currently does not exist between the tribe and MWD. As a general comment, the MWD should acknowledge and uplift tribal sovereignty in all urban planning and water management whenever possible. We appreciate our allies at East Yard Communities for Environmental Justice (EYCEJ) for continuously advocating for the involvement of tribal communities within this process.

We acknowledge that water use that sustains our homeland is stolen from Indigenous lands through the Colorado River Aqueduct, the LA Aqueduct, and the State Water Project Aqueduct. We stand in solidarity with tribal communities impacted by these projects and do not condone the theft of their sacred waters. Pure Water Southern California builds on the extensive legacy of colonialism that has produced environmental degradation and water supply instability. The MWD needs to acknowledge the legacy of profit-driven urban water planning that has overtaxed the natural watersheds, thus causing the need for this project. We acknowledge a management/planning crisis that exacerbates the climate crisis. We are in favor of protecting water from being stolen from other Indigenous lands by recycling water at home; however, we are also concerned with the low-income communities that will be most impacted by the construction and operation of Pure Water Southern California. The plan should guarantee that affordable water is provided to those communities first. We echo the sentiment of EYCEJ “we are fully against toxic polluters

(i.e. refineries, heavy manufacturing facilities, etc.) receiving any Pure Water Southern California recycled water.”

We request that in addition to fulfilling the obligations of AB52 via CEQA that the EIR include:

1. A commitment to work with Native American tribes to rehabilitate and protect watersheds that MWD has stolen water from.
2. Exact percentages of how water produced from project will be used for industry, groundwater recharge, and direct potable reuse.
3. Detailed projections of profits and how those funds will be used by the MWD and Los Angeles County Sanitation Districts

Thank you for the opportunity to submit these comments, and feel free to reach out if you would like to discuss anything in further detail.

Sincerely,

AnMarie Mendoza

Water Consultant- Gabrieleño/ Tongva San Gabriel Band of Mission Indians
Tongva Band of Mission Indians

Kimberly M. Johnson

Tribal Secretary

From: Ryan Nordness <Ryan.Nordness@sanmanuel-nsn.gov>

Sent: Thursday, October 20, 2022 3:11 PM

To: Soni,Rupam <RSoni@mwdh2o.com>

Subject: Notice of Preparation for Pure Water Southern California

Dear Rupam,

Thank you for contacting the Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians) regarding the above-referenced project. YSMN appreciates the opportunity to review the project documentation, which was received by the Cultural Resources Management Department on October 20th 2022. The proposed project is located outside of Serrano ancestral territory and, as such, YSMN will not be requesting to receive consulting party status with the lead agency or to participate in the scoping, development, or review of documents created pursuant to legal and regulatory mandates.

Kind regards,
Ryan Nordness
Cultural Resource Analyst
Yuhaaviatam of San Manuel Nation

Ryan Nordness

Cultural Resource Analyst

Ryan.Nordness@sanmanuel-nsn.gov

O:(909) 864-8933 Ext 50-2022

M:(909) 838-4053

26569 Community Center Dr Highland, California 92346



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Organizations

From: James Miles <miles.james@appliedspecialties.com>

Sent: Friday, September 30, 2022 9:59 AM

To: EPT <ep@mwdh2o.com>

Subject: Pure Water

I have been involved with the treatment plants at OCWD in Fountain Valley, Edward C Little Water Recycling Facility in El Segundo , and the ARC Advanced Water Treatment Facility in Pico Rivera. There three water recycling plants are helping to divert millions of gallons of sewage water from being pumped into the ocean and repurposed for ground water replenishment and to fresh water aquifers.

This technology is proven to be the BEST option for Southern California to survive future growth, conserve limited water supply, and keep sewage water out of our coastal water.

The recycling plants use a similar technology to desalination plants and they have a much lower environmental impact.

Regards,

Jim Miles - Sales Representative-West Region

Miles.James@AppliedSpecialties.com

951 454 5067



Notice:

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Fighting for Life

East Yard Communities for Environmental Justice – 2317 Atlantic Blvd. Commerce, CA. 90040

Ana Reyes
Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, CA 90054-0153
ep@mwdh2o.com

RE: Pure Water Southern California, Notice of Preparation (NOP)

Dear Ana Reyes,

East Yard Communities for Environmental Justice (“EYCEJ”) submits these comments on the Notice of Preparation (“NOP”) for Pure Water Southern California. EYCEJ is a non-profit, community-based organization dedicated to building community power through community organizing, policy, and movement building. EYCEJ has hundreds of members living in East Los Angeles, Southeast Los Angeles, Long Beach and surrounding areas.

We are community members who, for many years and generations, have used our voice to defend and protect water. We acknowledge that almost 60% of the drinking water that sustains life on Tongva Nation or so-called Los Angeles is stolen water from indigenous lands across turtle island. These sacred waters are forced to make their way to our region through the LA Aqueduct, Colorado River Aqueduct, and the State Water Project Aqueduct. Because of this reality and active harm, we understand the potential for wastewater recycling projects like Pure Water to allow our communities to be resilient and not depend on stolen water. However, Pure Water Southern California builds on the extensive legacy of for-profit racist land uses that disproportionately impact working class communities of color. The burden of living next to such facilities falls on us, while wealthier and often Whiter communities receive the greatest benefits. While the project has a proposed Distribution Network for the recycled water, our communities call on the lead agencies to support local ecosystems that allow recycled water from our region to be prioritized for aquifers locally. We are specifically concerned that the project will allow toxic polluters to receive recycled water; the project does not outline a plan to guarantee affordable drinking water rates to low income customers; the project makes no meaningful effort to center the guidance, decision-making, and sovereignty of the Tongva Tribe on whose ancestral lands this project will be built; and, the lead agencies have shared no intent to remain accountable to



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the harm they have caused for years of water extraction from the Colorado River Aqueduct and State Water Project Aqueduct or to commit to protect the water that will no longer be stolen from those native lands.

The following comments and questions have been collected from conversations with community members in EYCEJ membership spaces and leaders within our Water Committee. These are all grounded in knowledge and experience and should therefore be reviewed with considerable detail and thought. As we push to address the legacies of environmental racism and other systems of oppression, we strongly urge the Metropolitan Water District of Southern California, Los Angeles County Sanitation Districts, and the team working directly on this project to reflect on these harms and act preventatively by going beyond the basic guidelines and requirements for this project, and developing holistic solutions that center water, native nations, and communities of color over profit, monetized control, and exploitation of water.

Water Harm & Privatization

The Metropolitan Water District of Southern California currently steals water from indigenous lands through the Colorado River Aqueduct and the State Water Project Aqueduct. We request the Environmental Impact Report directly answer and consider the following questions:

1. The Environmental Impact Report must study the impacts of the Metropolitan Water District co-leading this project and further harming, privatizing, and commodifying water. Who initiated the proposal for this project and what was the main motivating factor for exploring concepts as early as 2010? At what price will the recycled water be sold to member agencies? How much profit is expected to be generated per month and year in the sale of the recycled water? How will this profit be divided between the Metropolitan Water District of Southern California and the Los Angeles County Sanitation Districts? How do these respective agencies plan to use these funds?
2. Pure Water Southern California has the potential to help our region stop relying on stolen water. However, the agencies leading this project have shared no comments about how they will commit to protecting the water that will no longer be stolen from the Colorado River Aqueduct and State Water Project Aqueduct or remaining accountable to the harm they have caused for years of water extraction. How much stolen water will be offset from the Colorado River Aqueduct and State Water Project Aqueduct as a result of this project? How will the Metropolitan Water District of Southern California take accountability for the years of intense water stealing from native lands? Will the project

and agency leaders commit to center and follow the decision-making of Native Tribes and peoples who have stewarded the lands for thousands of years? Will the project and agency leaders respect Native Tribes sovereignty and follow their lead with regards to the stewardship of the water that will no longer be stolen?

Uses of Recycled Water

With regards to the potential uses of the recycled wastewater, the NOP states, “*Metropolitan would provide metered service connections at various locations along the backbone and DPR pipelines to enable agencies to obtain water for industrial, groundwater recharge, and DPR uses.*” As industrial customers of Member Agencies, we are fully against toxic polluters (i.e. refineries, heavy manufacturing facilities, etc.) receiving any Pure Water Southern California recycled water. Additionally, we are concerned about the Distribution Network being presented for this project. Currently, the water from this project will be transported from the Carson and Long Beach area as far as the San Gabriel Basin, specifically to the Metropolitan’s F.E. Weymouth Water Treatment Plant in La Verne, Three Valleys Municipal Water District’s Miramar Water Treatment Plant and the Inland Empire Utility Agency Agua de Lejos Water Treatment Plant. While we understand the water needs across the region especially in this ongoing drought, we want to uplift the density of Los Angeles, the energy cost for transporting water to other regions, and the various similar Pure Water projects that are being created; therefore, we call for a prioritization of local ecosystems in all of these areas to support aquifers at a local level. We request the Environmental Impact Report directly answer and consider the following questions:

1. How is “industrial” defined?
2. What percentage of recycled water is expected to be used for industrial use?
3. What percentage of recycled water is expected to be used for groundwater recharge?
4. What percentage of recycled water is expected to be used for direct potable reuses?
 - a. Currently, State of California law does not allow for recycled water to be used through direct potable reuse. What plans is the project considering?
5. Will any of the recycled water be used for green hydrogen related projects?
6. Based on the current Letters of Intent and Agreements with Member Agencies, how much water is expected to be sold to each respective agency? How will the price for water be determined for each member agency?

Construction & Operations

With regards to construction activity, the NOP states, *“Construction and operation of Pure Water Southern California would require real property acquisitions in the form of temporary and permanent rights from public agencies, private utilities, and private landowners. Temporary rights such as temporary easements, leases, licenses, and permits would be required for temporary use of property for construction activities. Permanent rights, such as fee interests and permanent easements, would be required for the pipelines, pump stations, spreading facilities, and a potential satellite DPR facility.”* We request the Environmental Impact Report directly answer and consider the following questions:

1. What real property acquisitions will be made? Who will own the property, the Water District of Southern California or the Los Angeles County Sanitation Districts?
2. What pipes does the Metropolitan Water District of Southern California currently own or operate? What new pipes will be created? We request to see a visual map.
3. Our communities are faced with the threat of displacement as we become more desirable to developers and the wealthier and often Whiter residents they seek out. The Environmental Impact Report must study in detail and depth the impact on Population and Housing, specifically how this project will help families remain in their homes and not contribute to increase in rents and cost of living.
4. During property acquisition and construction activities, how will the project ensure unhoused community members are treated with dignity and respect? What collaboration will take place to ensure unhoused community members are not further displaced– kicked off to a different block– but rather provided with local permanent housing and social services options?
5. The NOP states, *“These methods would include trench excavation and backfill, as well as several different trenchless methods. To the extent feasible, trenchless methods would be used to minimize impacts to the San Gabriel River, major drainage channels, the transportation system, sensitive resources, and areas with limited rights-of-way.”* What impacts could be created for the San Gabriel River? The project lead agencies must work with the Tongva Tribe and ensure their direction is followed, especially regarding any possible harm to the San Gabriel River, soil disturbance, grading, and evacuation.
6. Probable Environmental Effect lists, “Tribal cultural resources: due to grading and excavation during construction.” This vague statement proves to be less than inadequate at identifying the probable impacts stemming from such an expansive project. The Environmental Impact Report’s final assessments must encompass converging

socio-economic and political impacts that extend beyond “excavation” activities (address what agencies have done to tribes in all their years of operation).

7. The NOP states, *“Operational activities for the pipelines and pump stations would be minimal and would include operating and maintaining the pump stations, patrolling the pipeline, maintaining patrol roads and facilities, securing the pump stations and other structures, periodically dewatering the pipeline for inspections/testing, and conducting repairs as needed.”* What does patrolling pipeline mean? This project should not contribute to or pay for any increased policing in our communities.
8. How much energy is expected to be used as part of Phase 1, Phase 2, and at the time of full operation of the facility? Where will this energy come from? How much energy will be used to have the recycled water travel from Carson to the San Gabriel Valley? Will the facilities use renewable energy?
9. The NOP states, *“The backbone pipeline would potentially pass through the cities of Carson, Long Beach, Lakewood, Cerritos, Bellflower, Norwalk, Downey, Santa Fe Springs, Duarte, Pico Rivera, Industry, El Monte, Baldwin Park, Irwindale, and Azusa, as well as unincorporated portions of Los Angeles County.”* Which unincorporated areas are these? How have the agency leads engaged community members in all of these neighborhoods?
10. With regards to Figure 1 on the NOP, which agency owns and operates the listed spreading grounds? Are these the only spreading grounds that exist within Central and West Basin or are there others?
11. Will there be any emission of pollutants released from the proposed recycling water process?
12. When the wastewater is cleaned and recycled, what happens to any trash, debris or toxins that are collected? How are they disposed of?
13. What independent third party testing will take place after the water has been recycled? How often will this third party testing occur?

Soil Contamination & Chemical Usage

We are highly concerned about the history of soil contamination at the proposed site. We request the Environmental Impact Report directly answer and consider the following questions:

1. What is the soil contamination history of the land at the proposed site and what efforts have taken place to assess and clean up the toxins in the soil? Are there ongoing remediation efforts?

2. The NOP states, *“In addition to the construction activities described above, construction activities at this site also would include demolition of an existing Sanitation Districts’ warehouse and maintenance basin; closure of existing oil wells; and modifications to or construction of new biological treatment processes.”* Will the soil be tested before demolition of the warehouse and maintenance basin to assess the possible presence of toxic chemicals? What air monitoring will be conducted during demolition to protect community members from dust particles? Will water suppression be used as a technique to suppress the movement of dust particles? What process will take place to close the existing oil wells? How will community members be notified and engaged?
3. The NOP states, *“Operational activities associated with these treatment facilities would include maintenance of facilities, structures, and equipment; storage of equipment and materials; delivery, storage, and management of treatment chemicals; and monitoring of water quality.”* What chemicals will be used to recycle and treat the wastewater? What are the human and environmental health impacts to these chemicals? Where will these chemicals come from? How will the chemicals be stored? How will chemicals be properly disposed of? What agency will oversee the chemical handling?

Affordability

We understand that Pure Water Southern California is an expensive project. We are concerned that customers rates will increase all while the project does not outline a plan to guarantee affordable drinking water rates to low income customers. We request the Environmental Impact Report directly answer and consider the following questions:

1. How is the project being funded?
2. How will this project ensure drinking water rates remain affordable, particularly for the working class communities of color that live adjacent to the facility, such as Carson, Compton, Long Beach, Wilmington?



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With over two decades of experience addressing the legacies of environmental racism in our communities, East Yard Communities for Environmental Justice is committed to continuing to engage the Pure Water Southern California process to ensure that as the most impacted, our communities continue to move forward in ways determined by us. Please contact Paola Dela Cruz-Perez at paola.eycej@gmail.com if you have any questions regarding this letter.

A handwritten signature in black ink, appearing to be "Paola".

Paola Dela Cruz-Perez
Youth and Water Organizer
East Yard Communities for Environmental Justice



Heal the Bay



November 14, 2022

Metropolitan Water District of Southern California
P.O. Box 54153
Los Angeles, CA 90054-0153

Sent via email to: ep@mwdh2o.com

RE: REQUEST FOR INPUT ON THE PURE WATER SOUTHERN CALIFORNIA NOTICE OF PREPATATION (NOP) OF AN ENVIRONMENTAL IMPACT REPORT

To the Metropolitan Water District of Southern California:

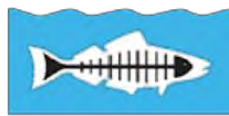
Heal the Bay is a non-profit environmental organization with over 35 years of experience and 20,000 members dedicated to making the coastal waters and watersheds of Greater Los Angeles safe, healthy, and clean. LA Waterkeeper is a non-profit organization with almost 30 years of experience serving as Los Angeles' water watchdog, safeguarding the region's inland and coastal waters using the law, science, and community action. We would first like to recognize that we are on unceded Indigenous land. The scope of the Pure Water Southern California Project (Pure Water Project) takes place across the lands of coastal Indigenous Peoples and Native Nations of the Tongva, Chumash, Fernandeano Tataviam Band of Mission Indians, and Kizh Nation tribes.¹ We would like to pay our respects to elders past, present, and emerging.

The Pure Water Project offers the opportunity to beneficially reuse purified water that is currently being discharged to the Pacific Ocean. Heal the Bay supports the Metropolitan Water District's (MWD) efforts to increase the use of recycled water through the Pure Water Project to reduce Southern California's dependence on imported water and responsibly diversify local water supply. We are encouraged to see the coordinated efforts on this project between MWD and the LA County Sanitation Districts, and support the proposed approach to do both a program-level Environmental Impact report (EIR) for concept-level pieces of the plan, and project-level EIRs for parts with sufficient design and technical information. We must ensure that the Pure Water Project is implemented in the most responsible and sustainable way. As we face continued effects of the climate crisis, the tools we choose to adapt to climate change cannot simultaneously exacerbate those effects. On behalf of Heal the Bay, we offer the following overarching recommendations for MWD to consider in the Preparation and Scoping Document for the Draft EIR:

- Pure Water Project product water must be used responsibly.
- MWD should consider all reasonable alternatives to ensure the most responsible approach is chosen for such a significant investment.
- The Draft EIR should take climate change into account and evaluate the climate resiliency of potential alternatives.
- The Draft EIR must consider potential impacts on receiving waters as brine discharge becomes more concentrated, particularly within the outfall dilution zone, and fully explore options for the least-environmentally damaging way to dispose of concentrated brine from reverse osmosis.
- The Draft EIR should evaluate the project locations using a holistic approach.
- MWD should conduct a study to understand sewershed health.
- Public participation must be prioritized throughout the environmental review process.

These recommendations are discussed in further detail below.

¹ Native Land Digital. 2021. "Native Land." Available at: <https://native-land.ca/>



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Pure Water Project product water must be used responsibly.

The use of treated wastewater for beneficial purposes is essential to reach water sustainability in a semi-arid state such as California. State legislators have recognized the need for permanent water conservation efforts throughout California, even in non-drought years, and the California State Water Resources Control Board supports an increased use of recycled water in order to reach water sustainability goals and prevent the waste and unreasonable use of wastewater.² The Pure Water Project proposes to beneficially reuse approximately 150 million gallons per day (MGD) of purified water that is currently being discharged from the Joint Water Pollution Control Plant (JWPCP) to the Pacific Ocean, and using this supply to offset water currently imported from the Colorado River Aqueduct and State Water Project.

Even with this additional water source, water will remain a scarce resource in Southern California. To ensure that investment in this project does lead to a reduced reliance on imported water, we must use this recycled water source wisely. Heal the Bay supports many of the uses proposed including to recharge groundwater basins, augment drinking water supplies with indirect or direct potable reuse, and irrigate open space that supports habitat for healthy ecosystems and offsets potable water use. However, we are concerned about the proposed industrial uses and landscape irrigation, if it is for ornamental landscapes. The EIR should consider the environmental impact of the entire Pure Water Project by explaining the intended uses of the product water, and the potential impacts and benefits of the product water uses.

MWD should consider all reasonable alternatives to ensure the most responsible approach is chosen for such a significant investment.

MWD states that the Draft EIR will evaluate potential environmental impacts, feasible mitigation measures, and reasonable alternatives. In selecting reasonable alternatives, we suggest that MWD evaluate worst-case scenarios in its environmental impact evaluations, and the associated mitigation measures should reflect this level of impact. We also recommend an analysis of the cost of not doing this project, given issues of water scarcity in Southern California to provide a balanced argument of costs and benefits. We therefore suggest including a “no build,” a “full build,” and multiple intermediate scenarios.

At least one of the reasonable alternatives should include simultaneous implementation of regional water recycling with the Pure Water Project and distributed water-recycling efforts. As we face increasing aridification in California, no single water supply project is going to secure a water resilient future. MWD is well positioned to create programs to offer distributed recycling options, in coordination with the regional Pure Water Project.

The Draft EIR should take climate change into account and evaluate the climate resiliency of potential alternatives.

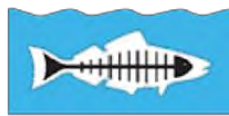
In considering reasonable alternatives, the Draft EIR should evaluate not only *what* is proposed to be built, but also *how* it is proposed to be implemented. For example, as construction occurs to install any necessary piping, there is an opportunity to simultaneously implement green streets that can provide myriad benefits, especially if healthy soils and vegetation are used.³ A climate consideration for the “no build” reasonable alternative would be the emissions savings by avoiding construction activities and

² California Code of Regulations: Water Code 13512.

<http://leginfo.ca.gov/faces/codesTOCSelected.xhtml?tocCode=WAT&tocTitle=+Water+Code+-+WAT>

³ City of Los Angeles Department of Sanitation. 2022. *Green Streets and Green Corridors*.

https://lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp/s-lsh-wwd-wp-gi/s-lsh-wwd-wp-gi-gs?_afLoop=140662490758450&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=y7nyj2wql_1#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D140662490758450%26_afWindowMode%3D0%26_adf.ctrl-state%3Dy7nyj2wql_5



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materials compared to the emissions cost of continuing reliance on imported water. There are multiple opportunities for individual projects like the Pure Water Project to be informed by MWD's Climate Action Plan, as explained in Heal the Bay's January 2022 Comment letter (Attachment 1). We request that MWD revisit Heal the Bay's Climate Action Plan Comment Letter, and carefully consider each aspect of the Draft EIR within the context of the climate crisis and the MWD Climate Action Plan.

The Draft EIR must consider potential impacts on receiving waters as brine discharge becomes more concentrated, particularly within the outfall dilution zone, and fully explore options for the least-environmentally damaging way to dispose of concentrated brine from reverse osmosis.

We are supportive of increased use of recycled water in order to reach water sustainability goals and prevent the waste and unreasonable use of wastewater. Some treated wastewater flows to the ocean through rivers and streams, and at least some of this flow may be needed to provide critical habitat for ecosystem health. However, the treated water that is discharged directly to the ocean does not provide that type of beneficial purpose, which supports maximizing water recycling efforts for this specific project.

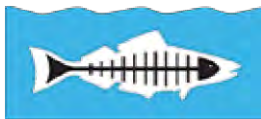
While the discharge of treated wastewater to the ocean does not provide benefit to that receiving water, we do have to consider the impacts of effluent discharge as the brine becomes more concentrated with increased production and use of recycled water, including through reverse osmosis. Treated wastewater effluent or concentrate remains a concern, particularly given potential negative impacts within dilution zones, where water quality regulation is often waived. The Draft EIR should include an assessment of current impacts of brine/reverse osmosis concentrate discharge within the JWPCP outfall dilution zone and a model to assess if and how those impacts will change as brine discharge becomes more concentrated. This should be a consideration for the "full build" reasonable alternative scenario, as well as any intermediate scenarios that increase water recycling above current levels. Further, the NOP states that the concentrate from reverse osmosis will be discharged to the Pacific Ocean, however, the draft EIR should fully examine additional alternatives for concentrate disposal to ensure that the least-environmentally damaging option is ultimately selected.

The Draft EIR should evaluate the project locations using a holistic approach.

The NOP project location scope to be evaluated in the Draft EIR includes the entire footprint of project operations, but lists them out as separate areas. Because these individual areas span such a large swath of Southern California, the Draft EIR should also consider geographic characteristics on both a small and a large scale, and consider how they may change throughout the lifecycle of the project. For example, geologic activity should be included as part of the project location scope in the DEIR evaluation, for both individual and cumulative impacts. MWD should also consider all changes in flow volume associated with current water use estimates, as well as possible increases and decreases in flow associated with stormwater capture and/or diversion projects as storm intensity increases.

MWD should conduct a study to understand sewershed health.

A sewershed is an area of land where all sanitary sewer lines flow to a single end point. Just as water quality in a lake or ocean is affected by the health of the watershed that flows into it, the water quality of the influent and effluent at wastewater treatment facilities is affected by the entire sewershed. MWD should conduct a study to better understand the health of its sewershed, to identify any contaminants that may cause issues of poor water quality (including pharmaceuticals and chemicals of emerging concern), and to explore policy solutions and outreach campaigns to reduce such contamination from the source. Reducing these contaminants at the source is likely to be more cost-effective than removal in the purification process, given the technology required for removal and testing and the sheer number of contaminants of emerging concern.



Heal the Bay

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January 6, 2022

Ms. Malinda Stalvey, Senior Environmental Specialist
The Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, CA 90054-0153

Sent via email to: EP@mwadh2o.com

RE: NOTICE OF AVAILABILITY – DRAFT CLIMATE ACTION PLAN, AND CLIMATE ACTION PLAN DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT

To Ms. Stalvey:

Heal the Bay is a non-profit environmental organization with over 35 years of experience and 15,000 members dedicated to making the coastal waters and watersheds of Greater Los Angeles safe, healthy, and clean. We would first like to recognize that we are on Indigenous land. The main office of Heal the Bay in Santa Monica is located on Tongva, Chumash, and Kizh land.¹ We acknowledge and respect Tongva, Chumash, and Kizh elders past, present, and emerging. Heal the Bay respectfully submits the following comments in response to the Metropolitan Water District (MWD) Draft Climate Action Plan (CAP) and CAP Draft Programmatic Environmental Impact Report (PEIR).

We would first like to acknowledge and commend MWD for creating this CAP and including interim goals to ensure achievement of carbon neutrality by 2045, as required by the State of California. We would also like to recognize the significant decrease in greenhouse gasses (GHGs) already achieved by MWD through actions such as conservation programs, groundwater recovery programs, and divesting in coal. However, the climate crisis is a huge challenge that we can – and must – overcome. Bearing that in mind, we must all recognize that we can no longer pursue unsustainable practices. With limited time and resources to achieve global climate reduction requirements, and with the health of our communities and ecosystem on the line, we must focus efforts on the latest science and the best practices available, offering the most benefit. We offer the following comments to bolster the MWD CAP, and to ensure successful implementation moving forward.

- The MWD CAP must address the larger context of the climate crisis and its myriad impacts to properly assess the most effective path forward.
- GHG reduction targets and land management practices should be based on the latest science and best management practices available.
- MWD should focus strategy efforts on the most sustainable approaches and invest in multi-benefit projects that utilize vegetated nature-based solutions.
- MWD must strive for transparency throughout the process of assessing implementation, reporting on progress, and updating the CAP every 5 years or earlier if necessary.
- MWD should pursue project level EIRs for individual projects proposed in the CAP to better understand the impacts of the project, to fully investigate alternatives, and to ensure public participation in project development and review through the CEQA process.

These comments are discussed in further detail below.

¹ Native Land Digital. 2021. Our home on native land. Available at: <https://native-land.ca/>



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The MWD CAP must address the larger context of the climate crisis and its myriad impacts to properly assess the most effective path forward.

Explain additional climate planning that has been completed by MWD.

The climate crisis is about much more than GHG emissions. We appreciate that wildfires are addressed in this CAP, but other impacts such as sea level rise (which will affect not only our coastline but also inland areas with the myriad impacts of seawater intrusion), are not. Please include in Section 2.0 "Scientific Context and Climate Change Impacts" a full discussion of the myriad impacts of the climate crisis, and include references to other MWD planning documents, when applicable, where additional associated climate planning has been completed.

Provide an overview of the State Water Project and associated GHG emissions.

We request that MWD include in their CAP an overview of the State Water project and its associated GHG emission, as outlined in the California Department of Water Resources Climate Action Plan. We understand not wanting to double count these emissions, but it would be helpful to understand the bigger picture if there was information on what percentage of MWD emissions are from the State Water Project, and how that might change if MWD could reduce its need to import water by sourcing more water locally.

We also request that MWD include a new section in the CAP to recognize the importance of a healthy Bay Delta to climate resilience on a larger scale, considering how heavily MWD currently relies on the import of water from the Delta, and the impacts that water transportation can have on this important ecological area.

Make additional small edits for clarification.

We also offer a minor edit to Page 1.19 of the MWD CAP to recognize that the local environmental responses to climate fluctuations have been variable throughout California's history, on a geologic time scale, but that the 2011-2014 drought is the hottest and driest period in recorded history.

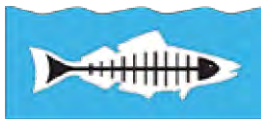
"This period includes the hottest and driest period in ~~California~~ recorded history ~~for California...~~"

GHG reduction targets and land management practices should be based on the latest science and best management practices available.

Adjust the current interim goal (to exceed 40% below 1990 emissions by 2030) to align with the Intergovernmental Panel on Climate Change recommendation to achieve 49% below 2017 emissions by 2030.

The Paris Agreement recognizes that we must remain under a 1.5°C rise in average global temperature in order to avoid an ecological tipping point that makes it more difficult to sustain healthy natural systems. The latest report from the Intergovernmental Panel on Climate Change (IPCC) states that it is still possible to remain under this 1.5°C tipping point, but that it will require immediate action to reduce emissions by 49% below 2017 levels by 2030 and to achieve carbon neutrality by 2050 through a combination of reducing emissions and sequestering carbon.

The MWD CAP recognizes the California State requirements to achieve 40% below 1990 emissions by 2030. We appreciate that MWD has set their own goal to exceed this 40% reduction requirement by 2030 in order to ensure that carbon neutrality can be achieved by 2045, pursuant to Executive Order B-55-18. We encourage MWD to make this goal more specific, and in line with the best available science, by maintaining the final goal to achieve carbon neutrality by 2045, and including an interim goal to achieve a 49% reduction below 2017 levels by 2030.



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Update the definitions of low, average, and high emissions scenarios based on increases in local water supplies such as stormwater capture.

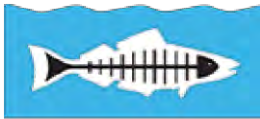
We urge MWD to update the definition of low, average, and high emissions scenarios (based on projections around the average rainfall year and therefore how much imported water is necessary) to reflect projected improvements in local stormwater capture as an additional source of local water supply. Between investments from water agencies (such as MWD), local funding through the Safe, Clean Water Program (SCWP), as well as available state and federal funding, the potential is enormous for stormwater capture to fulfill a high percentage of Southern California's water needs, thus reducing the need for imported water and providing additional opportunities to reduce GHG emissions. We encourage MWD to work with other local agencies and municipalities, such as the Los Angeles County Department of Public Works, to identify potential for collaboration and for increasing local water supply.

Land management practices should pursue multiple benefits and be conducted in consultation with local and Indigenous expertise.

The language used focuses on the threat wildfire poses to the workers on site and the MWD owned buildings. MWD should instead make it clear that these wildfire prevention measures are needed to preserve human life on and off MWD property, protect public health and quality of life from impacts to air quality and water quality, and to protect lands surrounding MWD property. We also recommend that MWD work with local and Indigenous experts to properly manage MWD owned land. MWD should also make sure that traffic control plans for wildfire emergencies are heavily scrutinized, as wildfires continue to increase in intensity. In addition to identifying wildfire hazard zones, MWD should also take into account sensitive ecosystems and habitat areas that could be impacted by wildfire. If operations will increase the wildfire risk to a significant natural area, MWD should take extra precautions. MWD also states that some jurisdictions have more stringent wildfire restrictions than others. We urge MWD to follow the most stringent regulations at all developments, regardless of jurisdiction, except where necessary to protect local ecological health (e.g. not removing more vegetation than is necessary, etc.). This approach will be most protective of human life, local ecosystems, and MWD facilities.

We also recommend that MWD utilize vegetated nature-based solutions to the extent feasible on all projects moving forward, again conducted in consultation with local and Indigenous experts. Examples of GHG reduction efforts in the CAP include conservation of natural lands, which is important; however, MWD cannot use existing natural space to offset future emissions in order to achieve carbon neutrality by 2045. New natural space must be created or restored in order to generate the sequestration necessary to offset any continued emissions, and there are opportunities for creating new natural spaces within the scope of MWD planned projects. For example, road construction will be necessary to lay piping for the Regional Recycled Water Project, and that construction can include replacing existing roads with Living Streets.² MWD could even pursue local funding through Measures W and M to cover any additional costs, and the myriad benefits would far surpass the limited co-benefits currently identified in the MWD CAP. An added benefit to this approach of using vegetated nature-based solutions is that healthy soils with healthy vegetation and microbial ecosystems can actually hold more water, increasing our capacity for natural water storage, as well.

² Climate Resolve, GreenLA Coalition, and Heal the Bay. "Living Streets Economic Feasibility Study Final Report." Available at: <https://healthebay.org/sites/default/files/pdf/fact-sheets/Final%20Living%20Streets%20Working%20Economic%20Feasibility%20%20Final%20Print%20Version%20022616.pdf>



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MWD should focus strategy efforts on the most sustainable approaches and invest in multi-benefit projects that utilize vegetated nature-based solutions.

We generally support the goals for GHG emissions reduction and the plans to achieve reduction outlined in Strategies 1-6 of the MWD CAP. We appreciate ways in which MWD has taken responsibility for emissions that fall within their operational control down to very fine details and even including planned contracted construction work. However, one major oversight is consideration of GHG emission associated with the manufacturing of supplies used by MWD or its contractors such as the production of asphalt for repaving.

MWD should remove all reference to “Low Carbon Electricity” from Strategy 4, and instead focus entirely on renewable carbon-free sources of electricity.

We do have some concerns regarding Strategy 4: Utilize Low-Carbon and Carbon-Free Electricity. There is a definition in the CAP for carbon-free electricity (“electricity produced by a resource that generates no carbon emissions”) with a few examples given as renewable energy (such as photovoltaic, nuclear, and large hydroelectric sources). MWD should include clarifying language to explain their definition of Carbon-Free Electricity that “generates no carbon emissions” refers to the power generation itself, and not to include emissions from, for example, construction of associated power generating or storage facilities. We further urge MWD to modify this definition to include only renewable energy and to prioritize renewable energy sources with fewer negative environmental impacts. For instance, nuclear and large hydroelectric sources for energy should be deprioritized given the known environmental issues with nuclear waste disposal and impacts to riparian ecology and anadromous fish from dams. In particular, we do not support the creation of new dams for energy (or water) needs. Additionally, MWD should remove any reference to “Low-Carbon” from Strategy 4 and focus on renewable carbon-free energy sources. At a minimum, MWD must clearly define “Low-Carbon Electricity” within the context of this CAP.

MWD must support movement towards a circular economy as part of Strategy 7.

We support the Phase 1 measure of zero landfilled waste, as these GHG emissions from waste are not insignificant, as well as the prioritization of these measures into the short-term Phase 1 strategies. However, zero landfilled waste is not attainable with continued widespread use of non-recyclable or non-compostable products, most notably many types of single-use plastic such as polystyrene. Therefore, to achieve this goal, MWD must also support strategies that phase these products out of the consumer market chain and support movement towards a circular economy.

As a fossil fuel product, emissions from plastics are a serious contribution to overall GHG emissions throughout the entire lifecycle of the material and is on trend to “account for 20% of total oil consumption and 15% of the global annual carbon budget by 2050 (this is the budget that must be adhered to in order to achieve the internationally accepted goal to remain below a 2°C increase in global warming).”³ We suggest that MWD support municipalities such as the Los Angeles City Council in developing and passing policies, many of which are already in motion, that reduce not only the disposal of GHG emitting plastics into landfill, but truly phase out non-recyclable and non-compostable options and support reuse and refill to truly reduce waste from the source and achieve zero net waste.

³ World Economic Forum. 2016. “The New Plastic Economy: Rethinking the Future of Plastic.” Available at: https://www3.weforum.org/docs/WEF_The_New_Plastics_Economy.pdf



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We are supportive of Strategy 8, though we encourage MWD to invest further in stormwater capture, and incorporate vegetated nature-based solutions into all projects moving forward.

We support expanding MWD education programs, as well as the continuation of water efficiency programs. We encourage MWD to also expand all successful water efficiency programs to the extent possible to ensure accessibility.

We also support the turf removal program. However, we do request that MWD include a clear definition for “water efficient landscapes” to not include impermeable surfaces and to prioritize landscapes utilizing climatically appropriate native plant species. We also encourage MWD to expand any incentives associated with this program and to pursue the option for a funding program to provide access for low-income households or historically under-resourced communities.

We most certainly support funding for stormwater projects, but this can no longer be considered a pilot project. The water supply benefits of stormwater capture are well known and documented, as reported by LA for a New Economy in 2018⁴ and the Pacific Institute in 2020.⁵ The successful passage of Measure W and creation of the Safe, Clean Water program in 2018 provides further evidence, and also provides the potential for additional project funding which could be leveraged with existing MWD resources to create multi-benefit stormwater capture projects. Examples of the types of projects that MWD is pursuing provided in the CAP are spreading basins, dry wells, and infiltration galleries. However, the ecosystem health co-benefit claimed for these types of projects are limited, at best. As discussed above, multi-benefit projects using vegetated nature-based solutions are the best way to achieve ecosystem health benefits and can offer immense return on investment costs through other co-benefits, as well. This can also make these kinds of projects more competitive for securing additional funding.

Similarly, we also support the Regional Recycled Water Project. Increased use of recycled wastewater is another smart water practice that Heal the Bay supports. However, there are opportunities to utilize vegetated nature-based solutions (e.g. implementing Living Streets during necessary road construction for setting new pipelines) that MWD is not yet pursuing. In fact, the pumping stations required for this project will significantly increase energy demand, and carbon sequestration will be necessary to offset that demand. Living Streets is one way to increase local carbon sequestration.

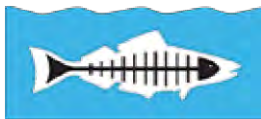
MWD should prioritize natural carbon sequestration, and not rely too heavily on engineered solutions for carbon capture and storage.

MWD should focus efforts on continuing restoration and protection of natural spaces and on creation of new natural space through the implementation of vegetated nature-based solutions within projects moving forward. Engineered solutions for carbon capture and storage do not provide the myriad co-benefits that vegetated nature-based solutions offer. Therefore, MWD should not rely too heavily on future technological advances in these kinds of engineered solutions.

Additionally, we do support regenerative agriculture practices, and encourage MWD to conduct this work in coordination with local and tribal land management experts. Particularly for strategy

⁴ Los Angeles for a New Economy. 2018. “Liquid Assets: How stormwater infrastructure builds Resilience, Health, Jobs, and Equity.” Available at: http://laane.org/wp-content/uploads/2018/03/LAANE_Liquid-Assets_Stormwater-Report.pdf

⁵ The Pacific Institute. 2020. “Economic Evaluation of Stormwater Capture and Its Multiple Benefits in California.” Available at: <https://pacinst.org/publication/economic-evaluation-of-stormwater/>



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CS-3 for soil carbon sequestration, MWD should collaborate with groups such as the Marin Carbon Project to maximize soil carbon sequestration on all MWD owned land.⁶

MWD must strive for transparency throughout the process of monitoring implementation, reporting on progress, and updating the CAP every 5 years or earlier if necessary.

We appreciate that MWD has opted to define specific reduction targets in this CAP, and support the carbon budget approach to measure progress towards meeting its GHG reduction goals. We understand that the Climate Working Group will provide updates on CAP implementation progress and status of the carbon budget to the Board of Directors on an annual basis, and that this process will also include updates on Metropolitan's CAPDash and monitoring software, which will be used to provide transparent and regular updates for stakeholders. To ensure full transparency, please include in the CAP a detailed list of information that will be shared through the CAPDash website to ensure that the public will have access to all the necessary information to assess progress.

One piece of information that should be disclosed through the CAPDash website is a clear statement of whether or not MWD is on track to achieving both the interim 2030 reduction goal and the final 2045 carbon neutrality goal, with supporting evidence to back the statement up. This will not only provide transparency to the public for the implementation process, but also allow for public engagement if it does become necessary to update the CAP prior to the designated 5-year interval. Please also include in the first annual report a determination of whether or not WMD met the 2020 projected target necessary to achieving carbon neutrality by 2045, as outlined in Figure 4-1 of the MWD CAP.

In addition to transparency through the CAPDash website, MWD should begin immediate outreach and engagement on the next 5-year update to engage local communities, as well as the environmental community at large, early and often in the update process.

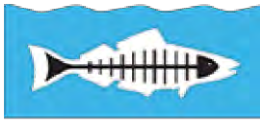
MWD should pursue project level EIRs for individual projects proposed in the CAP to better understand the impacts of the project, to fully investigate alternatives, and to ensure public participation in project development and review through the CEQA process.

It is unclear why a PEIR is necessary at this time rather than approving the MWD CAP now, moving forward with implementation, and conducting project level EIRs as necessary. The PEIR recognizes one of the main issues still to be addressed: how to address impacts from individual projects under the proposed CAP. The PEIR states that it serves as a first-tier CEQA document that will support second-tier CEQA documents for individual projects to be implemented under the proposed CAP. It also states that the projected significant and unavoidable impacts in the resource categories of air quality, cultural resources, and noise may change once individual project details are known and project-level analysis occurs. Therefore, it is still unclear what level of environmental investigation will be required for any given project proposed in the CAP, particularly since projects outlined in the CAP have yet to be approved by the MWD Board. For example, how will the impacts of larger scale infrastructure projects (like those on the scale of the Regional Recycled Water Project) be addressed? Some specific examples would be helpful.

MWD must also revisit the alternatives section of the draft PEIR. This is another area where the PEIR will be insufficient and a project level EIR would be more appropriate. The only alternatives explored are an alternate location (rejected due to restrictions around MWD owned properties), alternative methods (rejected without much detail because other methods would also result in similar construction related impacts), and no project (which would result in having to face the broader implications of the climate crisis). However, this alternatives section does not explore the full breadth of approaches that MWD could pursue, including the recommendations provided in this letter.

.....

⁶ Marin Carbon Project. 2018. <https://www.marincarbonproject.org/>



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Thank you for the opportunity to comment on the Draft Climate Action Plan and associated Draft Programmatic Environmental Impact Report. We believe that the Climate Action Plan, with the recommendations provided above, has the potential to contribute significantly to global GHG reduction goals, and serve as an example of good climate practice. MWD states in the CAP that it can be used by the 26 member agencies when considering local policies and programs. We encourage MWD to work collaboratively with these 26 member agencies now, and consider providing requirements or incentives where feasible to include member agencies in these plans and in achieving similar goals. In this way, the MWD CAP can have broader implications even beyond those that fall under operational control.

We look forward to continuing our collaborative work with the Metropolitan Water District in order to ensure a sustainable, affordable, and accessible water future for Southern California. If you have any questions concerning this comment letter, please contact Annelisa Moe via e-mail at amoe@healthebay.org, or by telephone at (310) 451-1500 X115.

Sincerely,

Annelisa Ehret Moe
Water Quality Scientist
Heal the Bay

Dr. Katherine Pease
Science and Policy Director
Heal the Bay



November 14, 2022

Ana Reyes
The Metropolitan Water District of Southern California
Environmental Planning Section
P.O Box 54153
Los Angeles, California 90054-0153

Sent via email to: AReyes@mwdh2o.com; RSoni@mwdh2o.com; EP@mwdh2o.com

RE: Request for Input on the Pure Water Southern California Notice of Preparation of a Draft Environmental Impact Report

To Ms. Ana Reyes:

On behalf of Los Angeles Waterkeeper (“LA Waterkeeper” or “LAW”), the region’s leading nonprofit watchdog advocating for resilient, local water supplies, we are asking for a robust alternatives analysis through the environmental review process for Pure Water Southern California that takes a regional approach to assessing wastewater recycling in order to maximize the use of such purified wastewater while minimizing adverse impacts of the project.

Enhancing local (climate-smart) water supplies throughout Southern California is essential to provide regional water security in the face of ongoing drought, to reduce our carbon footprint to help slow climate change, and to reverse the catastrophic impacts our “pump-and-dump” water policies have had on the Colorado River, the Bay-Delta, and Owens Valley. That is why LAW has long advocated for the “4R” approach to enhance local water supplies: reduce use of water through conservation and efficiency; reuse captured stormwater; recycle wastewater (predominately for potable uses); and restore contaminated surface and drinking water sources.

As such, LA Waterkeeper has been a staunch supporter of the Pure Water Southern California project (“Project” or “PWSC”) being developed jointly by the Metropolitan Water District of Southern California (“MWD”) and Los Angeles County Sanitation Districts (“LACSD”). With a goal of purifying approximately 150 million gallons a day (“MGD”) of wastewater for beneficial use, the potentially transformative PWSC would become the world’s largest wastewater recycling project, and one that would help reshape local water supplies in the Los Angeles region for the next century.

As important as wastewater recycling is to ensure Southern California’s water security, however, it is critical that such projects are developed as responsibly as possible. Specifically, wastewater recycling projects must be undertaken in a way that minimizes or eliminates potential adverse impacts, including energy use/carbon footprint; impacts of construction on communities, the environment, and cultural resources; high costs that would unduly impact local ratepayers, and the impact of reduced flows on inland waterways. For many of these potential impacts, the

largest factor of concern for the Project is the amount of piping and pumping of water over long distances to treat wastewater and distribute the recycled water for end uses.

As part of MWD’s programmatic Environmental Impact Report (“EIR”) for PWSC, a robust analysis of alternatives must be performed to inform overall decision-making and ensure the selection of the project alternative with the least environmental impacts. The EIR must first assess how the PWSC project as currently envisioned can be undertaken to maximize wastewater recycling while minimizing adverse impacts. In particular, MWD should explore alternatives that will reduce piping and pumping of water, even if such alternatives may face existing regulatory challenges (such as groundwater adjudication), and seek to reduce negative impacts on flows of inland waterways, such as the San Gabriel River. This assessment should explore more centralized and more decentralized project alternatives. Such an analysis should also consider various alternatives that include indirect as well as direct potable reuse as we await the State Water Resources Control Board’s adoption of final Direct Potable Reuse regulations in 2023.¹

While a robust alternatives analysis of the PWSC is essential, we do not believe it is sufficient to keep the project focus on MWD’s action alone. The PWSC is just one of many proposed wastewater recycling projects throughout the Los Angeles region. The City of Los Angeles is looking to recycle all of its wastewater by 2035 (Hyperion 2035) as part of a larger effort to promote greater water independence for the city (Operation NEXT). Smaller examples exist as well, including the West Basin Municipal Water District’s possible expansion of its already successful Edward C. Little Wastewater Recycling Facility and Las Virgenes Municipal Water District’s planned Pure Water project. Collectively, these wastewater recycling projects could result in the beneficial reuse of well over **300 MGD of purified wastewater**, meeting nearly a third of the region’s water needs. And looking within MWD’s service territory but beyond LA County, there are additional water recycling projects in the works that include the potential expansion of Orange County’s groundbreaking Groundwater Replenishment System and Pure Water San Diego.

Collectively, these recycling projects could provide the foundation for a “*new Mulholland Moment*” that helps transform Southern California from a massive water importer to a more climate resilient and water secure region powered by local water. But such transformation comes at a cost – these projects will likely come with a price tag of between \$20 billion and \$30 billion over the next twenty years. As such, it is critical that the responsible agencies coordinate as closely as possible on these recycling projects, and integrate those projects together where feasible. Agency collaboration will ensure that those investments result in the maximum benefits to local water supplies and minimum costs to ratepayers.

Importantly, agency coordination and integration is also needed to reduce the collective environmental impacts of such recycling projects. By thinking more regionally and holistically about wastewater management, and by considering the economies of scale that could come through integration of existing and planned wastewater systems, MWD would ensure in the EIR

¹ See California State Water Resources Control Board, [Regulating Direct Potable Reuse in California](#) (July 2022).

that it is selecting a Project alternative that minimizes the overall impacts and unintended consequences of Pure Water Southern California.

There are a multitude of environmental considerations underlying the design and scope of a regional wastewater recycling program, and it is vital for MWD to consider all such aspects of environmental repercussions to avoid unintended consequences and select the least impactful alternative. Impacts from Pure Water Southern California that should be studied and addressed within an alternatives analysis include but are not limited to:

- Direct impacts to receiving waters and aquatic environments from the discharge of brine and other contaminants produced from the filtration and treatment process;
- Energy costs as well as short-term and long-term carbon releases from construction and increases in concrete-based piping infrastructure, and their associated climate and environmental impacts;
- Energy use associated with operations, including filtration and treatment of wastewater, pumping wastewater and recycled water between different treatment plants, and pumping recycled water to the end users;
- Diminished flows in inland receiving waters (rivers, creeks, etc.) due to reduced discharges of treated wastewater, and the associated impacts to ecological health, aquatic and avian species and recreational beneficial uses;
- Potential threats to public health, including from emerging contaminants;
- Impacts on cultural resources, particularly indigenous resources of the Tongva, Chumash, Fernandeño Tataviam Band of Mission Indians, and Kizh, where PWSC will take place, resulting from development and construction activities;
- Impacts on ratepayers from the project costs, with a focus on life cycle and full cost accounting principles, including costs of inaction (no project alternative); and
- Impacts on environmental justice communities from construction and operations, including climate impacts that disproportionately impact such frontline communities.

While we believe most Project alternatives will not have *significant* environmental impacts, it is crucial to assess a full slate of alternatives that *minimizes* any such impacts to the extent possible. As highlighted above, an alternatives analysis in the EIR should consider the development of innovative solutions to wastewater management, including implementing a more distributed approach through existing infrastructure that could be expanded or more fully utilized, or perhaps even building additional treatment facilities closer to sources of wastewater and the ultimate users of the purified wastewater. The EIR's alternatives analysis should also be undertaken with assessments of more regional approaches, which could include coordination with facilities outside LACSD's wastewater treatment system. A more decentralized approach could also lessen risks of catastrophic sewage spills, as what happened at the Hyperion Wastewater Treatment Plant in July 2021.²

Ultimately, an alternatives analysis should better inform MWD in its decision-making, helping the agency to select an option that minimizes both the waste of water resources and the

² See, e.g., Robert J. Lopez, [Massive Santa Monica Bay Sewage Spill Likely Caused by Human Error, Equipment Failure](#), L.A. Times (Feb. 11, 2022).

amount of energy that goes into running Pure Water Southern California. As MWD upgrades and modernizes its wastewater infrastructure in the coming years – particularly in regard to large programs like Pure Water Southern California – it should avoid the trap of instinctively leaning toward solutions of wastewater management that require huge investments in large existing facilities and extensive piping infrastructure and lengthy distribution systems. Expanding wastewater infrastructure unnecessarily may also have greater risks of environmental contamination and reductions in wastewater quantities due to piping leaks and conveyance problems.

Not only is a fulsome alternatives analysis of Pure Water Southern California through a program-level EIR a reflection of good public policy, we believe it is also required for MWD to comply with the California Environmental Quality Act (“CEQA”) and its regulatory Guidelines. The CEQA Guidelines state that an EIR “shall describe a range of reasonable alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project, *and evaluate the comparative merits of the alternatives.*” 14 C.C.R. § 15126.6 (emphasis added).

Although “the range of alternatives required in an EIR is governed by a rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice, the alternatives “*shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project*” on the environment. 14 C.C.R. § 15126.6 (emphasis added). The alternatives must adequately represent the spectrum of environmental concerns in order to permit a reasonable choice of alternatives, and the EIR must provide the rationale for selecting or defining the alternatives evaluated throughout the document, including identifying any alternatives that were considered by MWD but rejected as infeasible during the scoping process. 14 C.C.R. § 15126.6. A robust alternatives analysis also must analyze the alternative of maintaining the status quo and not developing a project at all. 14 C.C.R. § 15126.6(e)(1).

CEQA Guidelines and California case law have determined that “an agency may not approve a project that will have significant environmental effects if there are feasible alternatives or feasible mitigation measures that would substantially lessen those effects.” Cal. Pub. Resources Code §§ 21002, 21002.1(b); 14 C.C.R. § 15021(a)(2); *Mountain Lion Foundation v. Fish & Game Com.* (1997) 16 Cal.4th 105, 134. As such, MWD cannot approve the Project unless it finds as to each significant environmental impact identified that (1) mitigation measures required in or incorporated into the project will avoid or substantially lessen the significant effect; (2) those measures are within the jurisdiction of another public agency and have been adopted, or can and should be adopted, by that agency; or (3) specific economic, legal, social, technological, or other considerations make the mitigation measures or alternatives identified in the EIR infeasible, and specific overriding economic, legal, social, technological, or other benefits outweigh the significant environmental effects. Cal. Pub. Resources Code §§ 21081, 21081.5; 14 C.C.R. § 15091(a), (b).

Lastly, while not part of a formal CEQA process, we recommend that MWD support the creation of an independent technical advisory committee that could assess wastewater recycling efforts from a regional perspective. Independent experts would be better able to identify preferred approaches that would maximize wastewater recycling while minimizing adverse

environmental impacts, identify potential challenges to such approaches, and offer guidance and recommendations to MWD and other agencies about how to best move forward when developing new recycled water initiatives. We believe an independent technical advisory committee would augment the alternatives analysis for the Project's EIR by ensuring greater transparency, and improving the coordination of wastewater management across different agencies and other entities. A robust alternatives analysis conducted by an independent technical advisory committee could also assess other important elements of the project typically beyond the scope of an alternatives analysis under CEQA, such as a comparison of the cost-benefit analysis of the proposed suite of alternatives that includes an analysis of maintaining the status quo and not developing a project at all. We hope that MWD will consider forming an independent technical advisory committee to aid its preparation of the EIR for the Project, and/or support other partner agencies that may wish to create such a committee moving forward.

* * * * *

In summary, we urge the Metropolitan Water District of Southern California to undertake a robust alternatives analysis in its Environmental Impact Report for Pure Water Southern California, including assessing a more decentralized and more integrated regional approach, to ensure that the decision-making process for this project is as informed as possible and results in the selection of a project alternative that minimizes environmental and community impacts.

Thank you for the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meetings for Pure Water Southern California. We look forward to continuing our collaborative work with the Metropolitan Water District of Southern California to preserve, enhance, and restore the quality of water resources in the Los Angeles region for current and future generations, including the development of Pure Water Southern California in the most responsible way possible. If you have any questions concerning these comments, please contact Justin Breck by email at justin@lawaterkeeper.org or by phone at (310) 394-6083 ext. 103.

Sincerely,

A handwritten signature in blue ink, appearing to read "Justin Breck".

Justin Breck
University of California President's Public Service Law Fellow
Los Angeles Waterkeeper

A handwritten signature in blue ink, appearing to read "Benjamin Harris".

Benjamin Harris
Staff Attorney
Los Angeles Waterkeeper



October 12, 2022

The Metropolitan Water District of Southern California
Environmental Planning Section
700 Alameda St, Los Angeles, CA 90012

Submitted electronically to: ep@mwdh2o.com

CC: Rupam Soni, Community Relations Team

RE: Request for Extension of Time to Provide Public Comment on Pure Water Southern California Notice of Preparation of an Environmental Impact Report

Dear Department of Water Resources:

I write on behalf of Sierra Club California's more than 500,000 members and supporters statewide to respectfully request a 30-day extension of time to provide public comment on the Pure Water Southern California Notice of Preparation of an Environmental Impact Report. Our organization is heavily engaged with water conservation in Southern California and is committed to ensuring that this public engagement process is as fruitful as possible for all stakeholders.

Pure Water is a project we are excited about and want to feel comfortable promoting it to water agencies and to the public, but we need to have a fuller understanding of the project before we can do so. As a non-profit organization, we are sometimes spread thin in our capacity, especially with the Delta Conveyance DEIR comment period, the Doheny Ocean Desalination comment period, and the midterm election season. For these reasons, we request to extend the comment deadline to December 14, 2022. We respectfully request that you provide us with a decision no later than October 26, 2022.

Thank you in advance for your consideration of this request.

Sincerely,

Charming Evelyn
Chair, Water Committee
Sierra Club California

Caty Wagner
Southern California Water Organizer
Sierra Club California



The Environmental Justice Coalition for Water
Water Justice for All

DATE: December 02, 2022

TO: Metropolitan Water District of Southern California (MWD)
Environmental Planning Section, P.O. Box 54153 Los Angeles, CA 90054-0153
EP@mwdh2o.com/ www.mwdh2o.com/purewatercomments

Attn.: Ms. Ana Reyes

CC: Rupam Soni, Martha Tremblay

SUBJECT: Pure Water Southern California

RE: Notice of Preparation (NOP) for Draft Environmental Impact Report (EIR)

On behalf of Sierra Club, Society of Native Nations, 350.org, Desal Response Group, Southern California Watershed Alliance, Environmental Justice Coalition for Water, Social Eco Education and the River Project, we hereby submit comment on the Notice of Preparation for the Pure Water Southern California Project proposed by Metropolitan Water District of Southern California and the Los Angeles County Sanitation Districts. We acknowledge MWD as the lead agency and would like to thank the MWD staff for extending the comment period deadline to accommodate all of our schedules.

In the overview you state: "If approved, Pure Water Southern California would create and distribute a new sustainable water supply by harvesting the region's largest untapped source of cleaned wastewater. This new water supply would help reduce the region's dependence on imported water and would assist the region in addressing disruption to imported water supplies." We the aforementioned, have long advocated for less reliance on imported water and more development of local water sources, more use of recycled water, conservation measures and remediation of contaminated water bodies. We do believe

there is a greater role for MWD to play in developing local water resources and improving its present financial model to do so.

We fully support IPR and DPR and await the measures that will be put in place by upcoming legislation for the regulation of DPR. Sierra Club California does have a support DPR policy.

SUMMARY

We have reviewed the circulated NOP and find it inadequate and incomplete for preparation of scoping comments regarding the “Project” which is poorly defined and involves several distinct projects and must be considered as the Pure Water Program. The NOP eventually recognizes the same programmatic conditions and towards the end reflects that it is a program, and therefore the EIR must be a Programmatic EIR and different from a typical project EIR. The NOP lacks clear description as to the process of a programmatic EIR and requirements for a project or programmatic EIR; the NOP is inadequate and incomplete and must be recirculated as a subsequent Programmatic Notice of Preparation (NOP). The NOP is deficient for public and agency considerations and would lead to preparation of an incomplete and inadequate EIR.

Although the MWD claims lead agency status, no documents are referenced or even mentioned. No listing of all participating agencies/districts is provided nor any meaningful program map and district delineations. The NOP is deficient without clear establishment of lead agency and endorsements by other agencies and districts involved therein.

The NOP includes a single reference to the State Clearinghouse and Office of Planning and Research for all agency CEQA documents: “...will submit the Draft EIR to the State Clearinghouse and appropriate metropolitan council of governments for review and comment once completed (California Code of Regulations Section 15206(a)).” MWD has submitted NOPs for other projects under their development, but failure to submit this NOP and receive review comments by state agencies and regional offices clearly avoids the public review of CEQA. This NOP is totally inadequate without a SCH# 220----.

As a format for an EIR, the NOP must provide goals and objectives, which it has not. Without goals /objectives. policies and programs, the public cannot propose alternatives. Without a clearly defined and understandable project, the public cannot adequately define and recommend alternatives to the projects or the program. The NOP does not provide adequate and complete descriptions of the project(s) or program for the public to review and identify environmental sectors and conditions which would be impacted by construction and operations over the 10-plus years of construction and presumed 50-100 years of operations.

Detailed Comments for Pure Water Southern California based on final-signed-pure-water-nop.pdf (mwdh2o.com).

Transmittal Letter

Page 1, Paragraph 1

*This **purified water** would then be transported via new conveyance facilities as far north as the city of Azusa and as far east as the city of Upland to new or existing water distribution facilities. The purified water could be used to recharge the **West Coast, Central, Main San Gabriel, and Orange County groundwater basins** through **spreading facilities and injection wells** and to augment water supplies at water treatment plants owned and operated by Metropolitan in the cities of La Verne and Yorba Linda, by*

*the **Three Valleys Municipal Water District** in the city of Claremont, and/or by the **Inland Empire Utilities Agency** in the city of Upland.*

- Define “purified” in detail, other than 100.000% H₂O, including all pH-related chemical and disinfectants; and compare to Pure Water
- Provide MOA of all agencies and designation of MWD as Program lead agency and controller of all CEQA considerations
- Provide/required MOA for Programmatic EIR Process with compliance by all MOA-members for local considerations supporting those of MWD
- Provide a Programmatic CEQA Compliance system for all local and detailed construction projects related to the PW-Program and service areas
- Provide maps of all existing and proposed pipelines (>18in diam.)
- Provide current and future facilities for Pure Water Southern California.
- Provide served populations, households, and jobs for 2025-2050

Page 1, Paragraph 2

*Pure Water Southern California facilities would be located primarily within Los Angeles County, with some facilities **possibly** extending into **western San Bernardino County**. However, the **potential recipients of purified water generated and delivered by these facilities are spread over a much wider geographic area**. At project completion, Pure Water Southern California would provide nearly 155,000 acre-feet per year of sustainable, high-quality water to **supplement existing supplies** in the Southern California region.*

- Provide map of all Program-connected service areas and any related groundwater basin receiving Program waters which may extend beyond MWD boundaries and limits
- Provide map of all service areas and expected flows and service populations related to the Program and geographic area

Page 2, Paragraph 1

Attachment A to this Notice of Preparation (NOP) contains: (1) an overview of Pure Water Southern California; (2) a description of its components, anticipated construction and operational activities, and phasing of work; (3) a summary of the probable environmental effects; and (4) the expected level of environmental analysis. Additional information regarding Pure Water Southern California can be found at: www.mwdh2o.com/purewater.

- Provide “State Clearinghouse” Project Number (Office of Planning and Research) and proof of submission of Project (Program) for state agencies review. No such compliance appears to be available at this time
- Resubmit all pertinent project documents to the State Clearinghouse” and get a SCH Project Number (Office of Planning and Research) and recirculate for public and agencies comment
- No mention of Initial Study and “Project Description”. Provide public document in compliance with CEQA, initial studies, and determination

Page 2, Paragraph 2:

Notice of Preparation

*This NOP has been prepared to **inform** federal, state, and local agencies; non-governmental organizations; members of the public; and other interested parties that Metropolitan, **acting as the Lead Agency under the California Environmental Quality Act (CEQA)**, will prepare a Draft Environmental Impact Report (EIR) for Pure Water Southern California.*

- Provide memorandum of agreement for MWD and all pertinent agencies related to the Program and submit notices to the State Clearinghouse for access and review by all state agencies
- NOP is not just to inform, which it inadequately does, but to gain comments and scope definition for preparation of a DEIR or in this case a programmatic EIR. Submit to State Clearinghouse and acquire a SCH # 22.....

Page 2, Paragraph 3:

*Once certified, the EIR may be used by various public agencies in conjunction with their **issuance of permits, approvals, or funding for Pure Water Southern California**. To that end, this NOP is being **sent to responsible, trustee, and other public agencies** as part of the review process required under CEQA (Public Resources Code Section 21080.4) and the CEQA Guidelines (California Code of Regulations Section 15082). In addition to any comments on the scope and content of the EIR, Metropolitan requests that responsible and trustee agencies indicate their specific statutory responsibilities in connection with Pure Water Southern California.*

- Revise and include any discretionary actions required for a Programmatic EIR and the MWD's PWSC program
- NOP was NOT sent to SCH/OPR as required by CEQA and other current laws for review by all state agencies. Provide such submittals to SCH and acquire appropriate SCH# and elicit appropriate agency comments and recirculate for further local comments

Page 2, Paragraph 4:

*Accordingly, Metropolitan will conduct...and **will submit** the Draft EIR to the State Clearinghouse and **appropriate metropolitan council of governments** for review and comment once completed (California Code of Regulations Section 15206(a)).*

- State process requires the NOP to be submitted to the SCH, not just the EIR and all notices related thereto. Revise/Submit and collect State agencies comments and reopen NOP for further appropriate scoping comments
- Provide same to Southern California Association of Governments (SCAG) and appropriate regional offices of state/federal agencies

Attachment A Pure Water Southern California Notice of Preparation

Page1, Paragraph 3:

*Pure Water Southern California would be a partnership between Metropolitan and the Sanitation Districts to develop and implement a regional recycled water program. **These agencies began exploring the concept for such a program in 2010...investigations.** These have included...a variety of technical analyses of proposed system components and processes. In addition, **construction of a 0.5-MGD demonstration-scale purification facility at the JWPCP was completed and began operations in October 2019.** This facility is being used to evaluate treatment performance and to provide an opportunity for **public outreach and education.***

- ❖ Regional recycled wastewater effluent has been under study for more than 40 years, including in Orange County. Provide an adequate history of recycled water in Southern California, including Water Factory 21
- ❖ Discretionary approvals of funding and construction of physical plant require CEQA considerations, but none are mention. Provide references and access to all CEQA related considerations and documents related to construction of physical facilities in MWD areas

Page 1, Paragraph 4:

*This EIR will evaluate potential environmental impacts associated with construction and operation of Pure Water Southern California, as well as **feasible** mitigation measures and **reasonable alternatives**.*

- ❖ Use of feasible mitigation requires fiscal/financial considerations. Provide definitions and suitable capital and operational financial calculations for all mitigation measures and alternatives, including the proposed “Project”
- ❖ This is the first mention of alternatives. Provide a clear description of all Project/Program Goals, Objectives, and Policies/Programs. Without such, no one can provide reasonable alternatives for the Project/Program. As such have not been provided, revise and recirculate the NOP for additional scoping review and extend the period for public and agency scoping review with MWD’s proposal of alternatives to the proposed Project/Program

Page 1, Paragraph 5:

*If approved, Pure Water Southern California would create and distribute a new sustainable water supply by **harvesting the region’s largest untapped source of cleaned wastewater**.*

- ❖ Provide a definition of “cleaned wastewater” (e.g., 100.000% H₂O) and distinguish from “treated wastewater” (e.g., advanced tertiary wastewater)
- ❖ Provide listing and map of all “untapped sources of cleaned wastewater”
- ❖ Provide definitions for “sustainable”

Page 1, Paragraph 6:

*Specifically, Pure Water Southern California would involve **purification of cleaned wastewater** from...at a new Advanced Water Purification (AWP) facility to produce approximately **150 MGD, or nearly 155,000 acre-feet per year**, of sustainable, **high-quality water** predominantly for indirect and direct potable reuse*

- ❖ Provide definitions for purification, cleaned wastewater, sustainable, and indirect/direct potable reuse
- ❖ Provide comparative definitions of high-quality and cleaned waters
- ❖ Provide estimates of current and with Project/Program indirect and direct potable reuses

Treatment Facilities

Page 2, Paragraph 1:

*Indirect potable reuse, or IPR, refers to the introduction of **purified recycled water** into an environmental buffer, such as a groundwater basin, where the **purified water** would **naturally blend** with groundwater before it is extracted and introduced into a water supply system.*

- Provide an introductory sentence for two inset paragraphs
- Provide differences between purified recycled water and purified water
- Provide model and description of “naturally blend” when recharge with purified water and extraction are in effect, thereby rendering the aquifer as not natural
- Provide feasible basis for recharging of purified water into unpurified groundwater and then its re-introduction into a water supply system for human consumption
- Provide flowchart including treatment facilities required before reintroduction of groundwater contaminated pure water into a water supply

Page 2, Paragraph 2:

*Treatment of the purified water to DPR standards **could** occur at the AWP facility itself or at one or more offsite locations...in the city of Claremont, or the Inland Empire Utilities Agency Agua de Lejos WTP in the city of Upland.*

- This paragraph clearly shows the programmatic nature of the Pure Water “Project” and requires a programmatic EIR approach for the entire program; there isn’t a Project, nothing is fixed.
- Withdraw the entire NOP and revise for a specific project or a program for a programmatic EIR.

Page 2, Paragraph 3:

*In addition to these applications, agencies...would be able to connect to the **proposed conveyance facilities to serve industrial users**. Furthermore, **some water would be treated for irrigating parks and landscaping at or near the JWPCP**.*

- This paragraph, also, clearly shows the programmatic nature of the Pure Water “Project” and requires a programmatic EIR approach for the entire program, there isn’t a Project, nothing is fixed.
- Withdraw the entire NOP and revise for a specific project or a program for a programmatic EIR

Conveyance system

Page 3, Paragraph 1:

*In addition, facilities to **further treat purified water** from the AWP facility to **DPR standards** would be required. **Potential locations** for DPR treatment include the AWP facility; the Weymouth, **Miramar, or Agua de Lejos WTPs; or a satellite facility**, as described above.*

- Provide definition and facilities lists for “further treating” purified water. Provide comparison of chemical/biotic constituents of purified and DPR waters
- Provide listing, sizes, and facilities for all potential locations and maps showing all locations.

Page 3, Paragraph 4:

*The location of the proposed DPR treatment facilities at Miramar and Agua de Lejos WTPs would be **determined by their respective agencies**. The Miramar WTP... Claremont. The Agua de Lejos WTP...Upland. The potential satellite DPR facility would be located between the Santa Fe Dam area and the Weymouth WTP **at a location to be determined**.*

- Provide listing of agencies and their prospective sites and facilities and provide how the agencies will assess and review sites and facilities

Page 3, Paragraph 5:

*The backbone pipeline would have the capacity to convey approximately 150 MGD of **purified water** and would deliver this water for **various purposes** along the alignment, including **IPR, DPR, and industrial applications**.*

- Provide listing and estimated daily/annual volumes for all producers and major IPR, DPR, and industrial consumers
- Provide map of locations for any consumer of >15MGD.

Page 4, Paragraph 2:

*The San Gabriel Valley Municipal Water District’s existing Devil Canyon-Azusa Pipeline (Azusa Pipeline) **could potentially be used** to convey up to approximately 25 MGD of **purified water** to the Weymouth WTP; however, **its limited capacity would not meet DPR treatment goals**. Therefore, while*

the Azusa Pipeline could be used on an interim basis, Metropolitan proposes to ultimately construct a new DPR pipeline. At least two new pump stations would be required along the DPR Pipeline and/or Azusa Pipeline to pump the water eastward towards the Weymouth WTP. The Azusa Pipeline may also be used to convey water further east to the Miramar WTP and the Agua De Lejos WTP, which would require at least two additional pump stations along the Azusa Pipeline. Pump station locations would be determined at a later time.

- Provide detailed chemical standards for purified, pure, and DPR treatment goals
- Define all “interim conditions” and their bases. Define Ultimate Time, decade and year
- Provide expected/forecasted pressure gradients/head losses in DPR pipeline and bases for additional pump(s)
- Provide basis for decisions to convey water further east and prospective schedules, ultimately or “later time”
- When will pump station locations, sizes, and flows be determined and on what basis?

Page 4, Paragraph 3:

*To the **extent feasible**, trenchless methods would be used to minimize impacts to the San Gabriel River, major drainage channels, the transportation system, sensitive resources, and areas with limited rights-of-way.*

- Define feasible and economic for trenchless equipment and whether by purchase or contract
- Provide criteria for feasibility analyses for use of trenching or trenchless equipment and contractors

Page 4, Paragraph 4:

*To the **extent feasible**, previously disturbed sites would be selected based on availability during final design or at the time that construction is ready to proceed.*

- Provide design-contracting-construction/startup schedules for all elements upwards of \$10M in cost

Groundwater Recharge and Service Connections

Page 4, Paragraph 6:

*Metropolitan would provide metered service connections at various locations along the backbone and DPR pipelines to enable agencies to obtain water for industrial, groundwater recharge, and DPR uses. **Smaller diameter lateral pipelines** to connect the meters to new or existing facilities, as well as to provide non-potable water at and near the JWPCP, would be developed, constructed, and managed by these agencies.*

- ❖ Revise “service connections” to “agency connections” unless MWD is to have direct metered connections to “end-users”
- ❖ Provide different terms for agency meters and end-user service connection. Clarify as to whether or not MWD will provide direct metered services to end users.

Phasing

Page 5, Paragraph 3,5:

To augment regional water supplies in the near term, an early delivery component as part of Phase 1 is proposed to start construction in 2025 and be operational in 2028. Phase 2...Although the timing of this phase is uncertain, it is assumed for the purposes of this environmental analysis that construction would start in 2033 and that Pure Water Southern California would be complete and fully operational in 2036.

- Phase 1: 2023 > 2025 > 2028. Phase 2: 2033 – 2036 A total of 13 years
- Provide current/tentative schedules for entire program and for any construction greater than 3 months duration between 2023 and 2030 and for five-year increments thereafter
- Provide schedule/calendar for Program implementation and ultimate, full operations

PROBABLE ENVIRONMENTAL EFFECTS

Page 5, Paragraph 6

*Due to the size and scope of this undertaking, Metropolitan committed to preparing an EIR from the outset and, accordingly, **did not prepare an initial study**. As such, the EIR will address the **full suite** of resource categories contained in Appendix G of the CEQA Guidelines.*

- Project description herein is more limited than the standard initial study and requirements of Appendix G
- Provide responses to standard Appendix G checklist form.

Page 6, Paragraph 1:

Air Quality: due to operation of heavy equipment, vehicular use, demolition of facilities, materials delivery, grading, excavation... Energy: due to heavy equipment and vehicular use during construction... Greenhouse Gas Emissions: due to heavy equipment...operations.

- Accordingly, impacts associated with air quality, greenhouse gas emissions, and energy demand can be evaluated at a project level. Compared to SWP/CR Pipeline

Hydrology/Water Quality: due to grading, excavation, and materials storage associated with construction, as well as long-term impacts due to new impervious surfaces.

- Operational discharge of brine involves marine and estuarine waters
- Entire program depends on recharging and withdrawals of groundwater which is not mentioned herein
- Provide thorough discussions and maps regarding all groundwater uses/collections and of each groundwater basin, current uses, adjudication rights and discharges to land and marine based water resources.

Land Use/Planning: due to potential conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects

- Provide discussions of Growth Inducement either as part of land use and planning or of public utilities and infrastructure – service areas based on volume available and improved reliability and sustainability

Page 6, Paragraph 2:

*In addition to providing a **detailed analysis**..., the EIR will **identify feasible mitigation measures** and/or a reasonable range of **alternatives** that could avoid or reduce any significant impacts, as applicable.*

- Given the generally inadequate detail provided in the NOP, provide a clear definition of “detailed,” analyses and assessments related thereto
- Provide a draft Mitigation/Monitoring/Reporting Plan (MMRP) in the EIR for all Program projects and construction, with suitable bi-annual updates and reporting, to all agencies and users

Page 6, Paragraph 3:

Pure Water Southern California is **not anticipated** to have any **potentially significant** environmental impacts in the following resource categories: Aesthetics; ...; **Mineral Resources; Population and Housing; Public Services...and Wildfire**. While these resource categories will be examined in the EIR, the level of **analysis** is not anticipated to be as detailed as for the other resource categories noted above.

- Use proper punctuations of simple listings, “,” not “;”.
- Given the inadequate and incomplete character of the NOP, any anticipated consideration of the DEIR is not supported by the character of the NOP.
- Purification wastewaters discharges to the ocean outfall should be injected into depleted onshore oil/gas reservoirs which would be far less impacting than discharging waste brines to nearshore coastal waters and must be considered as alternatives, for potential significant impacts to marine biota.
- Provide for growth inducements reviews in Land Use, Public Utilities and Infrastructure.
- Provide current and projected populations, households, and jobs (SCAG’s 2025-2050) in the service areas for the program.
- As mentioned in the NOP, provide review of all oil wells - well finder through DoC-CalGEM and assure proper abandonments of wells within 50ft of program facilities.
- Provide for mitigation for all foundation constructions by monitoring and recovery for both Paleontological and Archaeological remains that maybe encountered.

Page 6, Paragraph 4:

EXPECTED LEVEL OF ANALYSIS

Design information for Pure Water Southern California currently exists at a **varying level of detail**. As such, it is anticipated that the EIR will provide both **program-level and project-level analyses** depending on the nature and scope of information available for each component. In general, the AWP facility (including the associated pump station and **potential DPR treatment facilities**), JWPCP modifications, and backbone pipeline are anticipated to be analyzed at the project level since sufficient design and technical information already exist.

- ❖ Provide list of project designs, site surveys, program analyses and web access thereto
- ❖ Provide a programmatic EIR for all elements and the “Projects”
- ❖ Provide clear descriptions/locations and process flow charts for potential, non-potential, and current/actual DPR treatment facilities of the Pure Water system

Page 7, Paragraph 1:

...pump stations have **not yet been determined**. Therefore, **site-specific impacts** from these facilities **may require** subsequent environmental review.

- ❖ Provide clear listing of pump stations and related facilities “determined” and “not yet determined” (=provisional) facilities for all prospective projects in Pure Water program.
- ❖ Provide Programmatic EIR with specific procedures to consider and incorporate future “projects”

Page 7, Paragraph 2:

Lastly, at present there is **only conceptual-level information available for the potential DPR-related treatment facilities**...; DPR pipeline and associated pump stations; the groundwater recharge facilities; and the various service connections. Accordingly, **these components are anticipated to be analyzed only at the program level in this EIR**.

- ❖ Provide definition of “program level” assessment for each component and overall system construction and operations

- ❖ Provide concordance of information, descriptions, flow charts, drawings, and maps for each level of project status (plan, design, contracts, completion, and at least 3 stages of operations).
- ❖ Withdraw the current documents and reissue as a “Programmatic EIR” NOP including process for future determination of elements within the Pure Water System

Page 7, Paragraph 3:

*In doing so, **these agencies** will determine whether the potential environmental impacts associated with that **discretionary action** already were addressed in the certified EIR or, alternatively, whether additional environmental review and analysis are required. The nature and scope of any additional review and analysis will be determined in accordance with the criteria set forth in CEQA Guidelines....*

- ❖ As lead agency and preparing the PEIR, MWD must provide a procedure for review and CEQA consideration of all future associated design, assessment, comparisons, public review, and certification process for all "project" CEQA considerations for assurance that CEQA is complied with at future consideration...project design, alternatives, mitigation measures, and certifications.
- ❖ Other agencies have to formally agree to the programmatic CEQA procedure rather than just assuming compliance
- ❖ Could be summarized with flow charts in the Final PEIR section for Mitigation, Monitoring, and Reporting Program
- ❖ Provide Programmatic EIR requirements for processing all program elements consistent with the Program and CEQA consideration for as yet generally described “projects” or program elements

We look forward to the next phase and our continued collaboration on this project.

Respectfully,

Charming Evelyn
Chair, Water Committee
Sierra Club Angeles Chapter
Co-Chair, Water Committee
Sierra Club California

Frankie Orono
Executive Director
Society of Native Nations

Conner Everts
Executive Director
Southern California Watershed Alliance
Desal Response Group

Martha Camacho-Rodriguez
Executive Director
Social Eco Education

Jack Eidt
Co-Founder
SoCal 350 Climate Action

Esperanza Vielma
Executive Director
The Environmental Justice Coalition for Water

Melanie Winter
Founder & Director
The River Project

Individuals

PUREWATER

SOUTHERN CALIFORNIA

Tarjeta de comentarios de alcance de EIR

QUEREMOS SABER DE USTED

The Metropolitan Water District of Southern California y Los Angeles County Sanitation Districts se están embarcando en el proceso de revisión ambiental para Pure Water Southern California.

De acuerdo con la Ley de Calidad Ambiental de California, hemos publicado un Aviso de Preparación que indica que prepararemos un Informe de Impacto Ambiental (EIR). El EIR evaluará los impactos del proyecto en las comunidades y el medio ambiente. Estamos iniciando nuestra fase de "alcance", en la que desarrollamos el alcance del EIR. Se identificarán los tipos de problemas, preguntas y preocupaciones ambientales que se estudiarán en el EIR.

Queremos saber de usted durante el alcance. Utilice esta tarjeta para dar su opinion.

Los comentarios deben presentarse antes del 14 de noviembre de 2022.

Nombre:

Maria Andrade

Organization:

SBCC NAC Mamas Unidas

Domicilio:

Correo electrónico:

maria-andrade67@yahoo.com

¿Le gustaría ser agregado a nuestra lista de correo electrónico para este proyecto?



Sí



No

Preguntas

Se solicita su opinion.

Considere cómo Pure Water Southern California puede afectar a las comunidades y al medio ambiente.

- ¿Tiene inquietudes, sugerencias o preguntas?
- Basándose en su conocimiento y experiencia con el área del proyecto, ¿existen condiciones o posibles impactos que debamos considerar?
- ¿Tiene recomendaciones para alternativas o medidas para reducir los impactos ambientales de la construcción u operación de las instalaciones de Pure Water Southern California?

Por favor comparta sus comentarios:

Mi preocupacion es como sabe si el
agua que llega a mi hogar esta limpia
Si habra un proyecto para cambiar las
tuberias.

Los comentarios deben presentarse antes del 14 de noviembre de 20

Devuelva esta tarjeta a nuestro puesto en un evento comunitario o visite nuestro sitio web para otras opciones de como enviar sus comentarios.



From: [Frank Calzada](#)
To: rsoni@mwadh2o.com; purewater@mwadh2o.com; [Reyes, Ana M](#); ep@mwadh2o.com; [PureWater Comments](#)
Subject: Re: EIR Scoping Comments - Frank Calzada
Date: Thursday, October 27, 2022 2:34:15 PM

For your reference, the following was submitted.

EIR Scoping Comments

Name	Frank Calzada
Address (optional)	Street Address: 14687 Cobalt St City: SYLMAR State / Province: California Postal / Zip Code: 91342
Email. We'll use your email address to send you a copy of your responses and comments.	Fcal030@gmail.com
Would you like to be added to our email list for this project?	Yes
Please provide your comments.	I feel we have been needing a facility like this for a long time now. I dint think people realize the situation we are in when it comes to clean water. I would welcome a purification plant here in the San Fernando Valley area.

You can [edit this submission](#) and [view all your submissions](#) easily.

From: [David Eisenberg](#)
To: rsoni@mwadh2o.com; purewater@mwadh2o.com; [Reyes, Ana M](#); ep@mwadh2o.com; [PureWater Comments](#)
Subject: Re: EIR Scoping Comments - David Eisenberg
Date: Friday, September 30, 2022 12:39:13 PM

For your reference, the following was submitted.

EIR Scoping Comments

Name	David Eisenberg
Address (optional)	Street Address: 510 N Maryland Ave Unit 307 City: Glendale State / Province: California Postal / Zip Code: 91206
Email. We'll use your email address to send you a copy of your responses and comments.	david.f.eisenberg@gmail.com
Would you like to be added to our email list for this project?	Yes
Please provide your comments.	<ol style="list-style-type: none">1. This is a great idea. Using water only once is not sustainable.2. People dump objects into the toilet which are toxic. There is also the microplastics which enter the system through washing machines. These need to be filtered out. Areas of study in the EIR should include: a) microplastics, b) medications, c) PFAS, d) cleaning products, e) chemicals leached out of materials that go down the drain.3. Be sure the EIR includes mechanisms to remove the 5 items listed above.

You can [edit this submission](#) and [view all your submissions](#) easily.

From: [Alek Friedman](#)
To: rsoni@mwadh2o.com; purewater@mwadh2o.com; [Reyes, Ana M](#); ep@mwadh2o.com; [PureWater Comments](#)
Subject: Re: EIR Scoping Comments - Alek Friedman
Date: Friday, October 28, 2022 6:49:27 PM

For your reference, the following was submitted.

EIR Scoping Comments

Name	Alek Friedman
Organization (optional)	Smart Urban Growth and Sustainability Advocate
Address (optional)	Street Address: 1330 N Orange Dr Apt 106 City: Hollywood State / Province: CA Postal / Zip Code: 90028-7532
Phone Number (optional)	(323) 465-8511
Email. We'll use your email address to send you a copy of your responses and comments.	alek3773@gmail.com
Would you like to be added to our email list for this project?	Yes
Please provide your comments.	I have a concern about the tap water quality and excessive amounts of added chemicals and heavy metals. Even though it's claimed to be officially "safe to drink", in reality the water in L.A. County is anything BUT safe. For starters, it has excessive amounts of chlorine, and other chemicals!! In fact, there is so much chlorine that a bathtub full of water - is seen as cyan-colored water! (the water should never be cyan / aqua colored; it should be slightly greenish, but overall neutral color). In addition, chlorine is known to cause allergies and/or developing long-term allergies in humans (which I have learned the hard way). I understand that some chlorine is necessary in tap water (to kill the harmful bacteria), the current amount is excessive. Please reduce the amount of chlorine (and other harmful chemicals), in order to not only make our water safer to drink, but to have a shower in, or to bathe in. Thank you.

You can [edit this submission](#) and [view all your submissions](#) easily.

PUREWATER

SOUTHERN CALIFORNIA

Tarjeta de comentarios de alcance de EIR

QUEREMOS SABER DE USTED

The Metropolitan Water District of Southern California y Los Angeles County Sanitation Districts se están embarcando en el proceso de revisión ambiental para Pure Water Southern California.

De acuerdo con la Ley de Calidad Ambiental de California, hemos publicado un Aviso de Preparación que indica que prepararemos un Informe de Impacto Ambiental (EIR). El EIR evaluará los impactos del proyecto en las comunidades y el medio ambiente. Estamos iniciando nuestra fase de "alcance", en la que desarrollamos el alcance del EIR. Se identificarán los tipos de problemas, preguntas y preocupaciones ambientales que se estudiarán en el EIR.

Queremos saber de usted durante el alcance. Utilice esta tarjeta para dar su opinion.

Los comentarios deben presentarse antes del 14 de noviembre de 2022.

Nombre:

Esther Hernandez

Organization:

SBCC

Domicilio:

560 King Ave Apt C Wilmington CA.

907 4/4

Correo electrónico:

hernandezesther80@hotmail.com

¿Le gustaría ser agregado a nuestra lista de correo electrónico para este proyecto?



Sí



No

**Se solicita
su opinion.**

Considere cómo Pure Water Southern California puede afectar a las comunidades y al medio ambiente.

- ¿Tiene inquietudes, sugerencias o preguntas?
- Basándose en su conocimiento y experiencia con el área del proyecto, ¿existen condiciones o posibles impactos que debamos considerar?
- ¿Tiene recomendaciones para alternativas o medidas para reducir los impactos ambientales de la construcción u operación de las instalaciones de Pure Water Southern California?

Por favor comparta sus comentarios:

me gustaria saber mas sobre este proyecto
porque nose nada sobre el reciclado
del agua yo pensaba que el agua
no se podia reciclar y mi duda es
el agua de baño y del lavar y es
la que se va reciclar porque para
poderla tomarla uno que sea segura y
limpia es a veces un poco de
pensar sobre to puedes tomar esa
agua. Gracias

Los comentarios deben presentarse antes del 14 de noviembre de 20

Devuelva esta tarjeta a nuestro puesto en un evento comunitario o visite nuestro sitio web para otras opciones de como enviar sus comentarios.

Para más información: Visite nuestro sitio web www.mwdh2o.com/purewater



From: [Michael Minor](#)
To: rsoni@mwadh2o.com; purewater@mwadh2o.com; [Reyes, Ana M](#); ep@mwadh2o.com; [PureWater Comments](#)
Subject: Re: EIR Scoping Comments - Michael Minor
Date: Friday, September 30, 2022 10:35:09 PM

For your reference, the following was submitted.

EIR Scoping Comments

Name	Michael Minor
Address (optional)	City: Ramona State / Province: CA Postal / Zip Code: 92065
Email. We'll use your email address to send you a copy of your responses and comments.	mhminor38@gmail.com
Would you like to be added to our email list for this project?	Yes
Please provide your comments.	My only concern is that recycled water be reintroduced into the drinking water stream as soon as possible to mitigate future losses. The only satisfactory alternate use would be for agriculture or aquifer recharging. Landscape or golf course use needs to stop.

You can [edit this submission](#) and [view all your submissions](#) easily.

Questions

Your input is requested.

Consider how Pure Water Southern California may impact communities and the environment.

- Do you have concerns, suggestions or questions?
- Based on your knowledge and experience with the project area, are there any existing conditions and potential impacts we should consider?
- Do you have recommendations for alternatives or measures to reduce environmental impacts of construction or operation of Pure Water Southern California facilities?

Please provide your comments:

The program coming to
my community sounds amazing.
We need to conserve every
resource possible. I love L.A.

Elena 424-703-0621
Morales

Comments are due by November 14, 2022.

Return this card to our booth at a community event or visit our website for other options to submit your comments.

For more information: Visit our website www.mwdh2o.com/purewater



From: [Norma Pedregon](#)
To: rsoni@mwadh2o.com; purewater@mwadh2o.com; [Reyes, Ana M](#); ep@mwadh2o.com; [PureWater Comments](#)
Subject: Re: EIR Scoping Comments - Norma Pedregon
Date: Tuesday, October 04, 2022 12:13:52 PM

For your reference, the following was submitted.

EIR Scoping Comments

Name	Norma Pedregon
Address (optional)	Street Address: 1716 Van Tress Ave City: Los Angeles State / Province: California Postal / Zip Code: 90744
Phone Number (optional)	(310) 480-4891
Email. We'll use your email address to send you a copy of your responses and comments.	adelante1716@hotmail.com
Would you like to be added to our email list for this project?	Yes
Please provide your comments.	<p>My main input into this project is to advocate for employing the surrounding community. Training for jobs for this project should be provided at the local community college and Harbor Occupational Center. Recruitment can be prioritized from the Harbor area high schools.</p> <p>My second concern is the lighting & noise factors from this project during & after completion.</p> <p>And I am hoping there is also a community representative available such as the Sanitation facility supports to keep lines of communication open to the surrounding neighborhood.</p>

You can [edit this submission](#) and [view all your submissions](#) easily.

From: [Kristi Phillips](#)
To: rsoni@mwdh2o.com; purewater@mwdh2o.com; [Reyes, Ana M](#); ep@mwdh2o.com; [PureWater Comments](#)
Subject: Re: EIR Scoping Comments - Kristi Phillips
Date: Monday, November 14, 2022 2:53:52 PM

For your reference, the following was submitted.

EIR Scoping Comments

Name	Kristi Phillips
Email. We'll use your email address to send you a copy of your responses and comments.	kristiperea@yahoo.com
Would you like to be added to our email list for this project?	No
Please provide your comments.	Recycled sewage = gross. Desalination = not gross. It's as simple as that. We plan on moving before Pure Water Project is implemented as recycled sewage is not something we are willing to accept from our water faucets.

You can [edit this submission](#) and [view all your submissions](#) easily.