

A decorative background element on the left side of the page, consisting of a large light blue rectangle on top of a large red rectangle.

Initial Study / Mitigated Negative Declaration – Response to Comments

SCH No. 2024060684

Long Beach Utilities Department

October 2, 2024

A solid dark gray horizontal bar located at the bottom right of the page.

Contents

1	Introduction	1
1.1	Index of Comments Received	2
2	Format of Response to Comments.....	3
2.1	Long Beach Unified School District.....	4
2.1.1	Comment Letter	4
2.1.2	Responses to Comments.....	6
2.2	Los Angeles County Sanitation Districts	8
2.2.1	Comment Letter	8
2.2.2	Responses to Comments.....	11
2.3	Gabrielino Administration.....	15
2.3.1	Comment Letter	15
2.3.2	Responses to Comments.....	16
2.4	City of Seal Beach Environmental Quality Control Board.....	17
2.4.1	Comment Letter	17
2.4.2	Responses to Comments.....	19
2.5	City of Seal Beach	21
2.5.1	Comment Letter	21
2.5.2	Responses to Comments.....	23
2.6	California Department of Transportation (Caltrans) District 7.....	27
2.6.1	Comment Letter	27
2.6.2	Responses to Comments.....	29
3	Revisions to Public Review Draft IS/MND.....	31

Tables

Table 1.	Comments Received During Public Review Period	2
----------	---	---

Figures

Figure 2-7.	Proposed SOI Amendment and HGS Annexation.....	33
-------------	--	----

Abbreviations, Acronyms, and Initialisms

CEQA	California Environmental Quality Act
DTSC	Department of Toxic Substances Control
EPA	Environmental Protection Agency
EQCB	Environmental Quality Control Board
HGS	Haynes Generating Station
IS/MND	Initial Study/Mitigated Negative Declaration
LACSD	Los Angeles County Sanitation District
LAFCO	Local Agency Formation Commission
LBUD	Long Beach Utilities Department
LBWRF	Long Beach Water Reclamation Facility
LBWRP	Long Beach Water Reclamation Plant
Manhole No.	MH
MM	Mitigation Measure
MMRP	mitigation monitoring and reporting program
MGD	million gallons per day
NOI	Notice of Intent
PM	particulate matter
Project	Long Beach Utilities Department's Haynes Generating Station Sewer Force Main Project
SCAQMD	South Coast Air Quality Management District
SOI	Sphere of Influence
WRP	Water Reclamation Plant

1 Introduction

This document comprises the Responses to Comments on the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Long Beach Utilities Department's (LBUD) Haynes Generating Station (HGS) Sewer Force Main Project (hereafter referred to as "Project"). The purpose of this document is to respond to comments received by LBUD during the Public Review Draft IS/MND public review period.

Consistent with California Environmental Quality Act (CEQA) Guidelines Section 15073, a Notice of Intent (NOI) to adopt a Mitigated Negative Declaration was provided to the local newspaper, made available online at the City of Long Beach Planning website, and uploaded to the State Clearinghouse on June 14, 2024.

The Public Review Draft IS/MND (State Clearinghouse No. 2024060684) was circulated for public review and comment pursuant to CEQA Guidelines Section 15073. The IS/MND was made available to the public for a period of 30 days, from June 14, 2024, to July 15, 2024. Copies of the Public Review Draft IS/MND were made available to the public at the following locations:

- Long Beach Community Development Department Website:
<https://www.longbeach.gov/lbcd/planning/environmental/reports/>
- LBUD, located at 1800 East Wardlow Road, Long Beach, CA 90807
- Billie Jean King Main Library, located at 200 W. Broadway, Long Beach, CA 90802
- Los Altos Neighborhood Library, located at 5614 E. Britton Drive, Long Beach, CA 90815
- Seal Beach Library, located at 12700 Montecito, Seal Beach, CA 90740

Six comment letters were received during the public review period.

LBUD is the Lead Agency under CEQA and is required to consider agency and public comments on the Draft IS/MND. The CEQA Guidelines do not require a lead agency to prepare written responses to comments received (see CEQA Guidelines Section 15088); however, LBUD has elected to prepare the following written responses with the intent of conducting a comprehensive and meaningful evaluation of the Project.

Information provided in this document clarifies, amplifies, or makes minor modifications to the Public Review Draft IS/MND. No significant changes have been made to the information contained in the Public Review Draft IS/MND as a result of the comments received, and no significant new information has been added that would require recirculation of the document pursuant to State CEQA Guidelines Section 15073.5. This document also includes a section that shows the minor modifications to the Public Review Draft IS/MND as a result of comments received during the public review period (refer to Section 3.3, Revisions to Public Review Draft IS/MND).

1.1 Index of Comments Received

During the public review period, comment letters were received on the Public Review Draft IS/MND from interested public agencies. Refer to Table 1 below for a list of agencies that provided comments on the Public Review Draft IS/MND. Agency comments have been organized and indexed with comment codes to provide easier view of comments and responses.

Table 1. Comments Received During Public Review Period

Comment Code	Agency	Date
LBUSD	Long Beach Unified School District	6/14/2024
LACSD	Los Angeles County Sanitation Districts	6/18/2024
GA	Gabrieleno Administration	6/18/2024
SBEQCB	City of Seal Beach Environmental Quality Control Board	7/8/2024
SB	City of Seal Beach	7/9/2024
Caltrans	California Department of Transportation (Caltrans) District 7	7/15/2024

2 Format of Response to Comments

Responses to each comment letter are provided on the following pages. Comment codes are listed in Table 1. Individual comments within each letter are bracketed along the left-hand margin of each letter and identified according to the comment code. LBUD's responses to each comment letter are provided following the respective comment letter and are referenced by comment code. As noted in some responses, LBUD has made minor text revisions to the Public Review Draft IS/MND in response to certain comments. Proposed revisions to the Public Review Draft IS/MND are included in Section 3, Revisions to Public Review Draft IS/MND.

2.1 Long Beach Unified School District

2.1.1 Comment Letter



LONG BEACH
UNIFIED • SCHOOL • DISTRICT

Business Services Department
Facilities Development & Planning
2425 Webster Avenue, Long Beach, CA 90810
Phone: (562) 997-7550 | Fax: (562) 595-8644
www.lbschoolbonds.net

June 14, 2024

VIA EMAIL

Long Beach Utilities Department
1800 East Wardlow Road
Long Beach, California 90807
Dennis.Santos@lbwater.org

RE: Comments on Notice of Intent to Adopt a Mitigated Negative Declaration for the Haynes Generating Station Sewer Force Main Project

Dear Long Beach Utilities Department,

The Long Beach Unified School District ("District") acknowledges receipt of Long Beach Utilities' Notice of Intent to Adopt a Mitigated Negative Declaration for the Haynes Generating Station Sewer Force Main Project.

We are writing to express our concerns and provide comments on behalf of the District regarding the proposed project, particularly its proximity to our schools.

LBUSD-1

The proposed project involves constructing a new 12-inch-diameter sewer force main from the Los Angeles Department of Water and Power (LADWP) Haynes Generating Station (HGS) to an existing 42-inch sewer main at the Los Angeles County Services District (LACSD) Long Beach Water Reclamation Facility (WRF). This infrastructure would enable the beneficial reuse of up to 2.841 million gallons per day (MGD) of industrial wastewater discharge and stormwater runoff from the HGS to the LACSD's Long Beach WRF. Approximately 17,000 feet of pipeline would be installed using both trenching and trenchless construction methods. Additionally, a flow control/pressure reducing station will be constructed at the LACSD Water Reclamation Facility. As part of the project, the LACSD plans to expand its service area boundary to include the HGS and annex it into LACSD Sanitary District Number 19 under its existing zoning.

LBUSD-2

The report does not address potential dust resulting from contaminated soils. Therefore, the District requests implementation of proper dust control methods and compliance with AQMD Rule 1466, where applicable. Furthermore, Sato Academy of Mathematics and Science is approximately 700 feet from the project study area. Please clarify the differences between the study area and the project area.

LBUSD-3

Additionally, there are three Long Beach USD schools within the vicinity of the project study area:



Business Services Department
Facilities Development & Planning
2425 Webster Avenue, Long Beach, CA 90810
Phone: (562) 997-7550 | Fax: (562) 595-8644
www.lbschoolbonds.net

LBUSD-3

- Charles F Kettering Elementary School, 550 Silvera Ave, Long Beach
- Sato Academy of Mathematics and Science, 1100 Iroquois Avenue, Long Beach
- Tincher Child Development Center, 1701 Petaluma Avenue, Long Beach

Since trenching will occur, we request that the area be fenced off to ensure student safety as students walk to and from school. Please also minimize traffic disruptions by establishing work routes away from schools, especially during drop-off and pick-up times.

LBUSD-4

In conclusion, the District appreciates the opportunity to provide comments on the Haynes Generating Station Sewer Force Main Project. We look forward to continuing collaboration with Long Beach Utilities to ensure that any proposed developments prioritize the health, safety, and welfare of our students and the surrounding community.

Thank you for considering our comments.

Please feel free to contact me at 562-997-7550 or DMiranda1@lbschools.net.

Sincerely,



David Miranda
Executive Director

2.1.2 Responses to Comments

Below are LBUD's responses to the comments received from the Long Beach Unified School District (LBUSD) for the Draft IS/MND on June 14, 2024.

LBUSD-1 LBUD appreciates LBUSD's feedback on the Draft IS/MND. This comment provides introductory remarks and a brief description of the proposed Project and does not contain any substantive comments about the environmental analysis or conclusions contained in the Draft IS/MND.

LBUSD-2 This comment states that the Draft IS/MND does not address potential dust resulting from contaminated soils and requests the implementation of proper dust control methods and compliance with AQMD Rule 1466. Additionally, the comment requests clarification about the distinction between the Study Area and the Project Area.

Construction-related dust is addressed in the Draft IS/MND in Section 3.III, Air Quality. As a criteria air pollutant, dust is classified as particulate matter (PM) and falls into two categories: PM₁₀ (particles 10 micrometers or smaller in diameter) and PM_{2.5} (particles 2.5 micrometers or smaller in diameter). As explained in the Draft IS/MND, the Project would not exceed the South Coast Air Quality Management District (SCAQMD) construction thresholds for criteria air pollutant emissions, including PM₁₀ and PM_{2.5}, and it would implement SCAQMD's dust-related best practices as required by Rule 403 to reduce PM₁₀ emissions.

AQMD Rule 1466 applies only to sites with soil that has been identified by the U.S. Environmental Protection Agency (EPA), the Department of Toxic Substances Control (DTSC), the State Water Board, the Regional Water Board, or a county, local, or state regulatory agency to contain one or more applicable toxic air contaminants. As explained in item d) of Section 3.IX, Hazards and Hazardous Materials, of the Draft IS/MND, there are no listed hazardous materials sites in the Project work limits; therefore, Rule 1466 does not apply.

LBUD would implement Mitigation Measure (MM) HAZ-1 to address the potential for unanticipated discovery of soil or groundwater contamination during construction. In the event that undocumented hazardous materials are encountered during construction, work would be halted and a remediation plan would be implemented. By adhering to the requirements of HAZ-1 and SCAQMD's regulations, the Project-related impacts from dust would be less than significant.

LBUD appreciates LBUSD's question about the definition of the Study Area and has added additional description to the Project Location and Study Area subsections in Section 2 of the IS/MND, as provided in Section 3 of this document. This would be considered a minor clarification to the IS/MND and does not constitute a substantive change to the analysis. This revision would not require recirculation of the IS/MND (State CEQA Guidelines Section 15073.5).

The following minor revision was made to page 7 under Section 2, Project Description, of the IS/MND:

A small portion of the Project is in the City of Seal Beach, California. For the purposes of characterizing existing conditions, a Project Study Area was

defined to encompass the Project construction footprint and adjacent properties. The Project Study Area is roughly bounded by North Studebaker Road to the west, East Willow Street to the north, State Route 22 (SR-22) to the south, and Interstate 605 (I-605) to the east.

In addition, dust control is also required per the State Water Resources Control Board (State Water Board) to comply with the latest Order of the Construction General Permit (CGP) and the Contractor will be required to prepare a project and construction specific Stormwater Pollution Prevention Plan (SWPPP) for a Linear Underground Project (LUP). Dust and/or water to control dust are both contributing factors to stormwater pollution and therefore, this is a major portion of this classification of construction. This plan will be uploaded to the RWQCB's SMART system website and issued a Waste Discharge Identification (WDID) number. The plan will also be monitored at all times by a full time third party Construction Management and inspection team that will ensure the dust control measures are implemented per the approved WDID permit.

LBUSD-3 This comment states that there are three LBUSD schools within the vicinity of the Study Area. This comment is correct; as provided on page 34 of the Draft IS/MND, there are three Long Beach USD schools within the vicinity of the Study Area: Charles F. Kettering Elementary School, Sato Academy of Mathematics and Science, and Tincher Child Development Center. These schools are identified on Figure 3-1 of the Draft IS/MND and considered in Sections 3.III, Air Quality; 3.IX, Hazards and Hazardous Materials; and 3.XV, Public Services. This comment states a fact and does not include any substantive comments or questions relating to the impact analysis or conclusions contained in the Draft IS/MND.

LBUSD-4 This comment requests that the areas where trenching will occur are fenced off to ensure the safety of students walking to and from school. Additionally, the comment requests that traffic disruptions are minimized by establishing work routes away from schools, especially during drop-off and pick-up times.

As stated in the Construction Details section on page 23 of the Draft IS/MND, pipeline trenches in any given location would be open for 2 to 3 days on average. At times when construction work is not occurring, trenches would be covered with steel plates or backfill material to restrict access and maintain public safety. Fencing would be at the bore pits for the trenchless construction and at the edges of the bridge work for safety and to prevent anyone interfering with this construction.

As identified in Section 3.XVII, Transportation, MM TR-1 would require a traffic control plan, which would reduce traffic impacts to less than significant by avoiding heavily congested areas during peak hours. Schools and drop-off/pick-up times would be considered in the traffic control plan and the Project would minimize traffic disruptions to the maximum extent feasible. Additionally, the City of Long Beach will be provided an opportunity to review and comment on the traffic control plan and notify LBUSD in advance of street closures, detours, or temporary lane reductions.

2.2 Los Angeles County Sanitation Districts

2.2.1 Comment Letter



**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager

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

June 18, 2024

Ref. DOC 7248193

VIA EMAIL Dennis.Santos@lbwater.org

Mr. Dennis Santos, Manager of Engineering
Long Beach Utilities
1800 East Wardlow Road
Long Beach, CA 90807

Dear Mr. Santos:

NOI Response to Haynes Generating Station Sewer Force Main Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Intent (NOI) to Adopt an Initial Study/Mitigated Negative Declaration (IS/MND) for the subject project on June 14, 2024.

In a Will Serve Letter dated June 12, 2024 (copy enclosed), the Districts provided Ms. Katherine Rubin with the Los Angeles Department of Water and Power (LADWP) detailed instructions concerning procedures to annex the Haynes Generating Station property to the Districts' service area, procedures to obtain an IW Discharge Permit, and comments on the plans previously submitted to the Districts for the proposed 17,000-foot long sewer that will connect to the Districts' sewerage system.

We offer the following comments regarding the IS/MND:

1. Please revise all references from "Long Beach Water Reclamation Facility" to "Long Beach Water Reclamation Plant".
2. **Section 2 Project Description, Page 11:** the subsection states that "*Tertiary-treated effluent is discharged from the Long Beach WRP to Coyote Creek at the discharge point 001 (LA-RWQCB Order Number R4-2022-0032, NPDES Permit No. CA0000353).*" Please note that the NPDES Permit Number for the Long Beach Water Reclamation Plant is CA0054119.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2742, or phorsley@lacsd.org.

Very truly yours,

Patricia Horsley

Patricia Horsley
Environmental Planner
Facilities Planning Department

PLH:plh

Enclosure

cc: Z. El Jack
S. Pegadiotes
O. Morales

DOC 7249472.D99



**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

Robert C. Ferrante

Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400

Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998

(562) 699-7411 • www.lacsd.org

June 12, 2024

Ref. DOC 7243783

VIA EMAIL katherine.rubin@ladwp.com and dennis.santos@lbwater.org

Ms. Katherine Rubin
Director of Corporate Environmental Affairs
Los Angeles Department of Water and Power
1111 Corporate Center Drive, Suite 303
Monterey Park, CA 91754

Dear Ms. Rubin:

Will Serve Letter for Haynes Generating Station Sewer Pipeline Project SC-0042

The Los Angeles County Sanitation Districts (Districts) received your will serve letter request on June 7, 2024, for the subject project located in the City of Long Beach. The project involves construction of an approximately 17,000-foot long, 12-inch diameter sewer force main from Los Angeles Department of Water and Power's (LADWP) Haynes Generating Station that will connect to a Districts' trunk sewer just upstream of the Districts' Long Beach Water Reclamation Plant in order to discharge a total of approximately 2.84 million gallons per day of industrial wastewater and stormwater. We offer the following comments regarding sewerage service:

LACSD-4

1. The two parcels where Haynes Generating Station is located (APNs 7237-018-270 and 7237-019-270) – and from which the wastewater flow will originate – are outside the jurisdictional boundaries of the Districts and will require annexation into County Sanitation District No. 3 before sewerage service can be provided. For a copy of the Districts' Annexation Information and Processing Fee sheets, go to <https://www.lacsd.org/services/wastewater-programs-permits/annexation-program>. For more specific information regarding the annexation procedure and fees, please contact the undersigned.

LACSD-5

2. The proposed project will require a Districts' permit for Industrial Wastewater Discharge. For information on the Industrial Wastewater Discharge Permit application process, go to <https://www.lacsd.org/services/wastewater-programs-permits/industrial-waste-pretreatment-program/industrial-wastewater-discharge-permits>. If you have any questions regarding this process, please contact Ms. Karen Luo, Senior Engineer in the Districts' Industrial Waste Section, at kuo@lacsd.org or (562) 908-4288, extension 2914. Please be advised that the Districts cannot begin processing the Industrial Wastewater Discharge Permit application until LADWP has submitted to the Districts a complete annexation application package, paid all required annexation fees, and the Districts' Board of Directors has approved submittal of the proposed annexation to the Local Agency Formation Commission (LAFCO) for approval.

LACSD-6

3. According to the preliminary plans for the proposed 12-inch diameter sewer force main (Sewer Plans) submitted for review to Mr. Leon Findlay, Project Engineer in the Districts' Sewer Design Section, the proposed force main will connect directly to the Districts' Joint Outfall "C" Unit 8A Trunk Sewer at Manhole No. (MH) C-347, located in private right-of-way along Coyote Creek just north of Willow Street. Note that the force main will have to convert to gravity prior to connection to the Districts' sewer. Please confirm your intent to connect to MH C-347 and verify the pipe size at the point of connection with Mr. Findlay at leonfindlay@lacsd.org or (562) 908-4288, extension 1635, no later than July 11, 2024. The Districts are currently rehabilitating the subject trunk sewer and can direct the contractor to install a sewer stub to MH C-347 to facilitate future connection of LADWP's sewer.

DOC 7243893.D0399

Ms. Katherine Rubin

2

June 12, 2024

LACSD-7

4. The Districts' 42-inch diameter Joint Outfall C – Unit 8A Trunk Sewer has a capacity of 18.6 million gallons per day (mgd) and conveyed a peak flow of 7.1 mgd when last measured in 2020.

LACSD-8

5. The wastewater from Haynes Generating Station will be treated at the Long Beach Water Reclamation Plant, which has a capacity of 25 mgd and currently processes an average flow of 11.4 mgd.

LACSD-9

6. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before LADWP is permitted to discharge wastewater from Haynes Generating Station to the Districts' Sewerage System. The required connection fee payment, if any, will be determined during the Industrial Wastewater Discharge Permit application process.

LACSD-10

7. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the applicant that the Districts intend to provide this service up to the levels that are legally permitted and to inform the applicant of the currently existing capacity and any proposed expansion of the Districts' facilities.

LACSD-11

Please be advised that the Districts will not approve the Sewer Plans until a complete annexation package is received by the Districts, all applicable connection fees have been paid by LADWP, and an Industrial Wastewater Discharge Permit has been issued by the Districts.

LACSD-12

Additionally, please note that even though the Districts may approve the Sewer Plans and issue the Industrial Wastewater Discharge Permit, LAFCO must approve annexation of the Haynes Generating Station property to the service area of County Sanitation District No. 3 before physical discharge into the Districts' Sewerage System will be permitted. Please note that the annexation approval process can take 6 to 12 months to complete.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2708 or at shirlywang@lacsdc.org.

Very truly yours,

Shirly Wang

Shirly Wang
Customer Service Specialist
Facilities Planning Department

SW:sw

cc: A. Schmidt
A. Howard
S. Patel
D. Pierce
S. Pike

DOC 7243893.D0399

2.2.2 Responses to Comments

Below are LBUD's responses to the comments received from the Los Angeles County Sanitation District (LACSD) for the Draft IS/MND on June 14, 2024.

LACSD-1 LBUD appreciates LACSD's input on the Draft IS/MND. This comment provides introductory remarks and a brief description of the proposed Project and does not contain any substantive comments about the environmental analysis or conclusions contained in the Draft IS/MND.

LACSD-2 This comment requests that references to the "Long Beach Water Reclamation Facility" in the Draft IS/MND be changed to "Long Beach Water Reclamation Plant" (LBWRP). LBUD appreciates LACSD's input on the correct name for the LBWRP. References to "Long Beach Water Reclamation Facility" in the Draft IS/MND have been changed to "Long Beach Water Reclamation Plant." The IS/MND has been revised to reflect the correct name, as noted in Section 3 of this document. This would be considered a minor clarification to the IS/MND and does not constitute a substantive change to the analysis. This revision would not require recirculation of the IS/MND (State CEQA Guidelines Section 15073.5).

The following minor revision was made throughout the IS/MND, starting on page 1 under Environmental Checklist Form:

The Project consists of a new sewer force main that would be constructed by LBUD within its current service area and designed to convey up to 2.841 million gallons per day (MGD) of flow from LADWP's HGS to Los Angeles County Sanitation District's (LACSD) Long Beach Water Reclamation ~~Facility~~ Plant (~~WRFP~~).

LACSD-3 This comment states that the NPDES permit number for the LBWRP is incorrectly stated in the IS/MND as CA0000353 and the correct permit number is CA0054119. LBUD appreciates LACSD's correction. The IS/MND has been revised to reflect the correct NPDES permit, as noted in Section 3 of this document. This would be considered a minor clarification to the IS/MND and does not constitute a substantive change to the analysis. This revision would not require recirculation of the IS/MND (State CEQA Guidelines Section 15073.5).

The following minor revision was made to page 11 under Section 2, Project Description, of the IS/MND:

Tertiary-treated effluent is discharged from the Long Beach ~~WRFP~~ to Coyote Creek at the discharge point 001 (LA-RWQCB Order Number R4-2022-0032, NPDES Permit No. ~~CA0000353~~ CA0054119).

LACSD-4 This comment introduces a second letter from LACSD and provides introductory remarks and a brief description of the proposed Project. The comment also states that the two parcels where HGS is located are outside the jurisdictional boundaries of LACSD and will require annexation into County Sanitation District No. 3 before sewerage service can be provided.

As detailed in Section 2, Project Description, of the IS/MND, one of the Project's three primary components is the annexation of HGS into the LACSD's Sphere of

Influence. This comment suggests that it be annexed into County Sanitation District No. 3. Based on this direction, LBUD has revised the IS/MND to indicate annexation into County Sanitation District No. 3 and not No. 19. Refer to Section 3 of this document for the revised text. This would be considered a minor clarification to the IS/MND and does not constitute a substantive change to the analysis. This revision would not require recirculation of the IS/MND (State CEQA Guidelines Section 15073.5).

The following minor revision was made to page 20 under Section 2, Project Description, of the IS/MND:

The proposed annexation includes the three parcels previously identified covering 129 acres (Assessor Identification Numbers 095-681-19, 7237-018-270, and 7237-019-270). The SOI amendment and annexation of the HGS property into the LACSD's Sanitary District Number ~~349~~ service area would reduce the OCSO service area boundary by 6.8 acres (APN Number 095-681-19) and increase LACSD's Sanitary District Number ~~349~~ service area boundary by 129 acres.

The following minor revision was made throughout the IS/MND, starting on page 13 under Section 2, Project Description:

- Objective 4. Annex LADWP's HGS into LBUD's and LACSD's District Number ~~49~~ 3 service areas, as required, and amend LBUD's and LACSD's Sphere of Influence (SOI), as required, to incorporate the HGS property.

Figure 2-7 of the IS/MND is revised to show annexation of LADWP's HGS into LACSD's Sanitary Sewer District No. 3.

LACSD-5

This comment states that the Project will require an LACSD permit for Industrial Wastewater Discharge, which cannot be processed until LADWP has submitted to LACSD a complete annexation application package and paid all required annexation fees, and the LACSD Board of Directors has approved submittal of the proposed annexation to the Local Agency Formation Commission (LAFCO).

LBUD appreciates LACSD's input on the approval process and timeline. As indicated in Table 2-1 in Section 2, Project Description, of the IS/MND, LBUD has anticipated the necessity of a permit for Industrial Wastewater Discharge from LACSD as part of the Project. LBUD notes the requirement of the annexation approval prior to processing the permit application and will provide the information required by LACSD as part of the Industrial Wastewater Discharge permitting process. No changes or edits to the IS/MND are required in response to this comment.

LACSD-6

This comment states that the preliminary Project plans show the proposed force main connecting directly to the LACSD Joint Outfall "C" Unit 8A Trunk Sewer at Manhole No. (MH) C-347. The comment says the force main is required to break to gravity prior to the connection to the LACSD sewer and requests confirmation of intent to connect to MH C-347, as well as verification of pipe size at the point of connection. The comment provides a contact for this request and states that the LACSD is currently rehabilitating the subject trunk sewer and able to facilitate future

connection to LADWP’s sewer. LBUD appreciates the details provided by LACSD regarding the Joint Outfall “C” Unit 8A Trunk Sewer and has updated the Project description on page 19 of the IS/MND to reflect the conversion to gravity prior to connection. The IS/MND has been revised to reflect the correct NPDES permit, as noted in Section 3 of this document.

The following minor revision was made to page 19 of IS/MND, under Section 2, Project Description:

The PRS would connect to an existing sewer main thereby converting the force main to gravity flow prior to the connection.

LACSD-7 This comment states that LACSD’s 42-inch diameter Joint Outfall C – Unit 8A Trunk Sewer has a capacity of 18.6 million gallons per day (MGD) and conveyed a peak flow of 7.1 MGD when last measured in 2020. LBUD acknowledges this comment and added this detail to Section 3.XIX of the IS/MND. Refer to Section 3 of this document for the revised text. This would be considered a minor clarification to the IS/MND and does not constitute a substantive change to the analysis. This revision would not require recirculation of the IS/MND (State CEQA Guidelines Section 15073.5).

The following minor revisions were made to page 76, Section 3.XIX, of the IS/MND:

Furthermore, the Long Beach WRP has a design capacity to provide primary, secondary, and tertiary treatment for 25 MGD of wastewater. The plant currently treats approximately 18 MGD of wastewater to a tertiary level to produce recycled water with an average daily flow of 11.4 MGD. An increase of 0.003 AFY of effluent to be treated at the Long Beach WRF would be nominal and would not result in an overcommitment to existing service capacity. Additionally, LACSD’s 42-inch Joint Outfall – Unit 8A Trunk Sewer has a capacity of 18.6 MGD and conveyed a peak flow of 7.1 MGD in 2020. As such, impacts would be less than significant, and no mitigation measures are required.

LACSD-8 This comment states that the wastewater from Haynes Generating Station (HGS) will be treated at the Long Beach Water Reclamation Plant, which has a capacity of 25 MGD and currently processes an average flow of 11.4 MGD. LBUD acknowledges this comment and added this detail to Section 3.XIX of the IS/MND. Refer to Section 3 of this document for the revised text. Refer to Response to Comment LACSD-7.

LACSD-9 This comment explains a fee that LACSD charges for connection to the Sewerage System or an increase in strength or quantity of wastewater discharge from connected facilities. This fee may require payment before LADWP is permitted to discharge wastewater from HGS to the LACSD Sewerage System. The required connection fee payment will be determined during the Industrial Wastewater Discharge Permit application process. LBUD acknowledges this comment and will pay the required fees for connection to the LACSD Sewerage System. No changes or edits to the IS/MND are required in response to this comment.

LACSD-10 This comment explains the LACSD’s obligations under the Federal Clean Air Act and states that the comment letter does not constitute a guarantee of wastewater service, but that the LACSD intends to provide this service up to the levels that are legally

permitted and inform the applicant of the capacity of the LACSD facilities. LBUD acknowledges this comment. No changes or edits to the IS/MND are required in response to this comment.

LACSD-11 This comment states that the LACSD will not approve the Sewer Plans until a complete annexation package is reviewed by LACSD, applicable fees have been paid by LADWP, and an Industrial Wastewater Discharge Permit has been issued by LACSD. LBUD acknowledges this comment and would ensure that all necessary prerequisite fees and approvals are received before submitting Sewer Plans for LACSD's approval. No changes or edits to the IS/MND are required in response to this comment.

LACSD-12 This comment states that even if LACSD approves the Sewer Plans and issues the Industrial Wastewater Discharge Permit, LAFCO must approve annexation of the HGS property before physical discharge into the LACSD's Sewerage System is permitted. The comment notes that the annexation approval process can take 6 to 12 months to complete. LBUD acknowledges this comment and appreciates LACSD's information about approval timelines. No changes or edits to the IS/MND are required in response to this comment.

2.3 Gabrieleno Administration

2.3.1 Comment Letter

On Jun 18, 2024, at 11:11 AM, Gabrieleno Administration <admin@gabrielenoindians.org> wrote:

Hello Amy

GA-1

Can you provide the mitigation measures ?

Admin Specialist

Gabrieleno Band of Mission Indians - Kizh Nation

PO Box 393

Covina, CA 91723

Office: 844-390-0787

website: www.gabrielenoindians.org

2.3.2 Responses to Comments

Below are LBUD's responses to the comments received from the Gabrieleno Band of Mission Indians – Kizh Nation for the Draft IS/MND on June 14, 2024.

- GA-1** On June 27, 2024, Gabrieleno Band of Mission Indians – Kizh Nation requested the mitigation measures included in the Draft IS/MND. The Project mitigation monitoring and reporting program (MMRP) is included as Appendix E to the Draft IS/MND. No changes or edits to the IS/MND are required.

2.4 City of Seal Beach Environmental Quality Control Board

2.4.1 Comment Letter



By Electronic Mail and USPS

July 8, 2024

Dennis Santos, Manager of Engineering
Long Beach Utilities Department
1800 East Wardlow Road
Long Beach, CA 90807

Re: Long Beach Utilities Department IS/MND- Haynes Generating Station Sewer Force Main Project – EQCB Comments

Dear Mr. Santos:

SBEQCB-1

Thank you for the opportunity to comment on the Initial Study/Mitigated Negative Declaration for the Haynes Generating Station Sewer Force Main Project ("Project"). The City of Seal Beach Environmental Quality Control Board (EQCB) convened on Wednesday, June 26, 2024 at 6:00 p.m. to review and discuss the project in detail. During this EQCB meeting, the EQCB carefully examined the contents of the IS/MND, the members deliberated on various aspects of the proposed project and formulated comments to provide feedback to the Long Beach Utilities Department. These comments, as stated below, are intended to help shape the scope and content of this project, ensuring that all significant environmental issues are adequately addressed.

SBEQCB-2

SBEQCB-3

SBEQCB-4

SBEQCB-5

SBEQCB-6

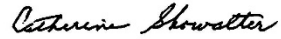
SBEQCB-7

- Upon analysis, it was determined that the project could have an impact on Seal Beach's Edison Park. To ensure compliance, it is crucial for Long Beach Utilities to collaborate with the City of Seal Beach in obtaining all necessary permits before commencing any work.
- Furthermore, it is advised that a comprehensive study be conducted to address the potential impacts on nearby Seal Beach neighborhoods such as Leisure World and College Park West, including assessing noise levels and traffic impacts. It is important to note that the report incorrectly identified the closest resident to the Project work area as being in Long Beach, whereas the closest resident is residing in Leisure World, 400 feet away.
- To adhere to regulations set by the City of Seal Beach Public Works Department, any damage to city property must be restored to its original condition. Additionally, if trenching or underground piping is needed, it is recommended that a less invasive construction method be used to minimize disruption to Seal Beach.
- In regards to permits to be requested from the City of Seal Beach, is a tree removal permit being considered? Specifically, what is being planned to be removed from Edison Park?
- Lastly, members of the EQCB have expressed a strong preference for the City of Long Beach Utilities to avoid encroaching on Edison Park. If it is necessary to do so, provide the compelling reasons supporting that decision.

City of Seal Beach
Alamitos Bay Water Quality Enhancement Project
July 8, 2024

Thank you for the opportunity to provide comments on the NOI for the City's consideration. We look forward to working with the Long Beach Utilities Department for a mutually beneficial Project.

Sincerely,



Catherine Showalter
Acting EQCB Chair

Cc: Donald Horning, EQCB Member
Dominic "Nick" Massetti, EQCB Member
Susan Perell, EQCB Member
James Villanueva, EQCB Member

2.4.2 Responses to Comments

Below are LBUD's responses to the comments received from the City of Seal Beach Environmental Quality Control Board (EQCB) for the Draft IS/MND on July 6, 2024.

- SBEQCB-1** LBUD appreciates EQCB's feedback on the Draft IS/MND. This comment provides introductory remarks and a brief description of the proposed Project and does not contain any substantive comments on environmental analysis or conclusions contained in the Draft IS/MND.
- SBEQCB-2** This comment states that the Project could have an impact on the City of Seal Beach's Edison Park and requests that LBUD collaborate with the City in obtaining required permits before commencing work.
- LBUD acknowledges the City's comment and notes that the City of Seal Beach is listed on Table 2-1 of the Draft IS/MND as a public agency with multiple permit approvals potentially required for the Project. LBUD will coordinate with Seal Beach on the precise permits needed for the Project pending Project final design. Based on the Project extents show on Figure 2-5 of the Draft IS/MND, no physical encroachment into Edison Park is currently proposed as part of the Project. Additionally, as provided in the Draft IS/MND, potential indirect impacts on Edison Park would be minimized through the implementation of MM AES-1, BR-6, NOI-1, NOI-2, and TR-1. Once constructed, the Project would be buried in the vicinity of Seal Beach, and long-term impacts would be less than significant.
- SBEQCB-3** This comment advises that a comprehensive study be conducted to address the potential impacts on nearby Seal Beach neighborhoods such as Leisure World and College Park West, including assessing noise levels and traffic impacts. The Draft IS/MND includes an analysis of noise and traffic impacts during construction. MM NOI-1, NOI-2, and TR-1 would reduce construction-related impacts to less than significant.
- SBEQCB-4** This comment states that the Draft IS/MND incorrectly identified the closest resident to the Project work area as being in Long Beach, whereas the closest resident is residing in Leisure World, 400 feet away from the contemplated limits of construction, as illustrated on Figure 2-5 of the Draft IS/MND.
- The comment incorrectly states that the residences in Leisure World would be the closest residences to the Project. As depicted on Figure 2-5 of the Draft IS/MND and described in Section 3.XIII, Noise, construction would occur within 50 feet of residences along Salida Avenue, East Lees Way, and Stevely Avenue in the City of Long Beach. Although residences in Seal Beach's Leisure World are closest to the Haynes Generating Station, they would be located at further proximity from the Project construction. Based on these details, the impact analysis in the Draft IS/MND is accurate in its assessment of potential construction-related impacts, and no revisions to the Draft IS/MND are required.
- SBEQCB-5** This comment states that, to adhere to regulations set by the City of Seal Beach Public Works Department, any damage to city property must be restored to its original condition. Additionally, the comment recommends that if trenching or underground piping is needed, a less invasive construction method should be used

to minimize disruption to Seal Beach. LBUD appreciates Seal Beach's input relating to restoration of affected roadways to pre-Project conditions and recommendations on pipeline construction. LBUD understands that the restoration of roadway pavement will be a condition of approval for related roadway encroachment permits. As described in Section 2 (page 24), LBUD plans to incorporate the use of trenchless construction methods (either jack and bore or horizontal directional drilling) to cross SR-22. LBUD plans to use the easement between SR-22 and College Park Drive to avoid any encroachment into portions of the roadway within the City of Seal Beach's jurisdiction.

SBEQCB-6 This comment inquires about whether a tree removal permit is among the permits to be requested from Seal Beach and what is planned to be removed from Edison Park. As stated in Section IV, Biological Resources, no tree removal is anticipated during implementation of the Project; however, if unanticipated trimming or removal is required as part of Project construction, the Draft IS/MND proposes the implementation of MM BR-6 to reduce this potential impact to less than significant by requiring a tree trimming permit. At this time, LBUD is in the process of confirming the precise location of the receiving pit between SR-22 and College Park Drive. For this reason, Table 2-1 of the Draft IS/MND identifies the potential for a tree permit from City of Seal Beach in the event that any trees within Seal Beach's city limits are proposed for removal. LBUD has also updated MM-BR-6 to include the City of Seal Beach, as provided in Section 3 of this document.

SBEQCB-7 This comment states that members of the EQCB have expressed a strong preference for LBUD to avoid encroaching on Edison Park, and requests that if it is necessary to do so, a compelling reason should be provided to support that decision. LBUD acknowledges the EQCB's concerns and, as provided in Response SBEQCB-2, the current Project alignment does not propose a physical encroachment into Edison Park.

2.5 City of Seal Beach

2.5.1 Comment Letter



July 9, 2024

Dennis Santos
Long Beach Utilities Department
1800 East Wardlow Road
Long Beach, CA 90807

**SUBJECT: Haynes Generating Station Sewer Force Main Project – IS/MND
City of Seal Beach Comments**

Dear Mr. Santos:

SB-1

Thank you for the opportunity to comment on the Initial Study/Mitigated Negative Declaration for the Haynes Generating Station Sewer Force Main Project ("Project") – dated June 2024. The Project proposes to install a new 12-inch-diameter sewer force main that would extend from the Los Angeles Department of Water and Power ("LADWP") Haynes Generating Station ("HGS") to an existing Los Angeles County Sanitation District ("LACSD") 42-inch service main located at the LACSD Long Beach Water Reclamation Facility ("WRF"). The portion along College Park Drive, then under State Route 22 to northeasterly portion of HGS are located within the City of Seal Beach ("City").

The City would offer the following comments and look forward to working with Long Beach Utilities Department and LADWP on the impacts to the City.

SB-2

1. **GENERAL** - The operations of LADWP's utility within the City's jurisdictional boundaries will require a City-approved franchise agreement.

SB-3

2. **INTRODUCTION, FIGURE 2-5** - The alignment is conceptual in nature. The City would request a detailed alignment to determine the specific impacts within its jurisdictional boundary.

SB-4

3. **INTRODUCTION, ROUTE DESCRIPTION** - The environmental document assumes Seal Beach will approve associated permits and agreements; however, discussions of alternatives should be provided should these discretionary instruments not be approved.

SB-5	4. INTRODUCTION, LACSD SPHERE OF INFLUENCE AMENDMENT AND ANNEXATION – The City requests to be part of the discussions to provide a full understanding of how this petition would affect Seal Beach.
SB-6	5. Section IV BIOLOGICAL RESOURCES – Modifications to or removal of trees located in Seal Beach will require a permit. Further, impacts to eucalyptus trees will require a separate Eucalyptus Tree Permit pursuant Seal Beach Municipal Code.
SB-7	
SB-8	6. Section XIII NOISE – The document should disclose that College Park Drive work is in close proximity to residences and Edison Park. Impact Analysis should also identify the potential to implement mitigation measures in these areas as necessary and as requested by the City.
SB-9	
SB-10	7. Section XV PUBLIC SERVICES - Construction notifications shall be provided to individual parcels at least ten (10) days and two (2) days prior to construction.
SB-11	8. Section XV PUBLIC SERVICES - Applicant shall be responsible for accommodating and coordinating all programmatic activities impacted by the Project.
SB-12	9. Section XVII TRANSPORTATION – College Park Drive is the only College Park West ingress/egress point. Full road closures will not be permitted at any point. All modified access must accommodate emergency response vehicles. Full access to Edison Park must be maintained at all times.
SB-13	All traffic control plans affecting College Park West access and/or within the City's jurisdictional boundaries shall be reviewed and approved by the City.

The City looks forward to coordinating with Long Beach Utilities Department in identifying and mitigating Project impacts. If you have questions regarding this letter, please contact me at (562) 431-2527 x1322 or ilee@sealbeachca.gov.

Sincerely,



Iris Lee
Director of Public Works

Cc: Jill Ingram, City Manager
Alexa Smittle, Director of Community Development
Kathryne Cho, Deputy PW Director/City Engineer

2.5.2 Responses to Comments

Below are LBUD's responses to comments received from the City of Seal Beach for the Draft IS/MND on July 9, 2024.

- SB-1** This comment provides introductory remarks and a brief description of the proposed Project and does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/MND.
- SB-2** This comment states that the Project operations within the City of Seal Beach's jurisdictional boundaries will require a franchise agreement and/or easement. LBUD appreciates the City of Seal Beach's input and will coordinate with Seal Beach on acquiring a franchise agreement and/or easement for components of the Project that overlap with Seal Beach's jurisdiction. Table 2-1 of the Draft IS/MND acknowledges Seal Beach's role in the Project's regulatory approvals. These coordination activities will occur as part of the Project's final design and prior to construction.
- SB-3** This comment states that the Project's current alignment is conceptual and that the City of Seal Beach would need a detailed alignment to determine the specific impacts within its jurisdictional boundary. This comment is correct; however, LBUD notes that the Project's impacts have been conservatively estimated and assessed in the Draft IS/MND. LBUD will share the Project's final design plans with the City of Seal Beach once available to coordinate permit requirements and any temporary construction or permanent easements.
- SB-4** This comment states that the IS/MND assumes Seal Beach will approve associated permits and agreements but should also discuss alternatives in case these discretionary instruments are not approved. LBUD has considered multiple route alternatives as part of the Project's preliminary design and carried forward LBUD's preferred alignment as part of the Project, as described and analyzed in the Draft IS/MND. The alternative routes considered by LBUD included alignments east of the San Gabriel River and within the San Gabriel River right-of-way, as well as other alignments to the west. Following consideration of these various alignments, LBUD selected the Project alignment, which maximizes opportunities for resource avoidance and minimizes direct impacts to communities within Seal Beach.
- SB-5** This comment requests that the City of Seal Beach be included in the discussions about the amendment of the LACSD Sphere of Influence (SOI) to get a full understanding of how this action would affect the City. LBUD appreciates Seal Beach's interest in the contemplated approval processes for the Project that will be required through the Orange and Los Angeles County LAFCO boundary adjustment processes, respectively. LBUD will include the City of Seal Beach in each respective LAFCO approval process so the City is informed of the timing and any corresponding effect to Seal Beach. At this time, LBUD is not aware of any impacts from the boundary adjustment that would otherwise adversely affect Seal Beach.
- SB-6** This comment states that modifications to or removal of trees in Seal Beach will require a permit. LBUD acknowledges this comment and refers Seal Beach to Response SBEQCB-6.

- SB-7** This comment states that impacts to eucalyptus trees will require a separate Eucalyptus Tree Permit pursuant to the Seal Beach Municipal Code. LBUD acknowledges this comment and, consistent with the revisions to MM-BR-6, would secure the appropriate tree removal permits as requested based on the Project's final design.
- SB-8** This comment states that the document should disclose that work on College Park Drive is in close proximity to residences and Edison Park. LBUD acknowledges the City of Seal Beach's request and has added additional description to Section 3.XIII of the IS/MND, as provided in Section 3 of this document. These minor revisions are provided in Section 3 of this document and are considered a minor clarification to the IS/MND and does not constitute a substantive change to the analysis. This revision would not require recirculation of the IS/MND (State CEQA Guidelines Section 15073.5).

The following minor revisions were made to page 76, Section 3.XIII, of the IS/MND:

Construction noise levels in the project vicinity would fluctuate depending on the particular type, number, and duration of equipment usage. The effects of construction noise largely depend on the type of construction activities occurring on any given day, noise levels generated by those activities, distances to sensitive receptors, and the existing ambient noise environment. Construction generally occurs in several phases, with each phase requiring different equipment with varying noise characteristics. Residences and park areas within 50 feet of construction in the Cities of Long Beach and Seal Beach could experience maximum noise levels during construction, as shown in Table 3.7.

- SB-9** This comment states that the Impact Analysis should identify the potential to implement mitigation measures in these areas as necessary and requested by the City of Seal Beach. LBUD has considered potential noise impacts from construction as provided in Section 3.XIII of the Draft IS/MND, which includes MM-NOI-1 and NOI-2 to mitigate for potential noise impacts during Project construction. As provided, once constructed, there are no new permanent noise sources associated with the Project that would otherwise result in permanent long-term increases in existing ambient noise levels.
- SB-10** This comment states that construction notifications shall be provided to individual parcels at least 10 to 2 days prior to construction. LBUD acknowledges this comment and will require the Contractor and/or Construction Manager to notify individual parcels at least 10 days prior to construction per LBUD's standard specification 01 10 03.
- SB-11** This comment states that the Project applicant shall be responsible for accommodating and coordinating all programmatic activities implemented by the Project. LBUD acknowledges this comment and will coordinate the Project's final design with Seal Beach to avoid conflicts with other projects and coordinate installation based on input from Seal Beach. Additionally, LBUD will have full-time, third-party Construction Management and inspection services for the Project to coordinate pre-construction meetings and related notifications.

SB-12

This comment identifies College Park Drive as the only College Park West ingress/egress point, and states that full road closures will not be permitted at any point. Additionally, the comment states that all modified access must accommodate emergency response vehicles, and full access to Edison Park must be maintained at all times. As discussed in Section 3.XVII, Transportation, of the Draft IS/MND, the Project will implement Mitigation Measure MM-TR-1, which requires the preparation and approval of specific traffic control plans for each phase of the Project. The traffic control plans will coordinate necessary lane and/or street closures between the contractor, private businesses, public transit, emergency service providers, and residents. LBUD has modified MM-TR-1 to include the following provisions within the Project's traffic control plans: 1) no full road closures of College Park Drive are allowed; 2) full access to public parks shall be maintained; and 3) emergency access shall be accommodated throughout construction. Additionally, LBUD will include these measures in the Project's contract documents so they are enforceable during construction. These minor revisions are provided in Section 3 of this document. This would be considered a minor clarification to the IS/MND and does not constitute a substantive change to the analysis. This revision would not require recirculation of the IS/MND (State CEQA Guidelines Section 15073.5).

The following minor revisions were made to MM-TR-6 under Section 3.XVII and Appendix E (MMRP) of the IS/MND:

MM TR 1: Prepare Standard Traffic Control Plan (TCP).

During the final engineering phase and at least 30 days prior to construction, a construction TCP shall be prepared by the contractor and reviewed and approved by the lead agency, City of Long Beach/LBUD.

The lane/street and bike trail closures in the construction TCP shall be coordinated between the construction contractor, private businesses, public transit and bus operators, emergency service providers, and residents to minimize construction related vehicular traffic impacts. During planned closures, traffic shall be rerouted to adjacent streets via clearly marked detours and notice shall be provided in advance to applicable parties (nearby residences, emergency service providers, public transit and bus operators, the bicycle community, businesses, and organizers of special events). The TCP shall identify proposed closure schedules and detour routes, as well as construction traffic routes, including haul truck routes, and preferred delivery/haul out locations and hours so as to avoid heavily congested areas during peak hours, where feasible. The following provisions shall be included in the TCP:

- Access to adjacent residences and public parks shall be maintained during business hours via existing or temporary driveways, and residences at all times, as feasible.
- Advance notice signs shall be posted prior to construction in areas where access to residences could be affected.
- Los Angeles Department of Transportation, Long Beach, Seal Beach, and Caltrans shall be provided an opportunity to review and comment on the

TCP for each phase of Project construction and notified in advance of street closures, detours, or temporary lane reductions. No full road closures of College Park Drive are allowed.

- Construction activities will occur outside of peak hours.
- Proposed detour routes for pedestrian and bicycle traffic along San Gabriel River Bike Trail if required.
- Emergency access shall be accommodated throughout construction.

SB-13

This comment states that all traffic plans affecting College Park West access and/or within the City of Seal Beach's jurisdictional boundaries shall be reviewed and approved by the City. LBUD acknowledges this comment and notes that this requirement is contained in MM-TR-1. No additional changes to the Draft IS/MND are required in response to this comment.

2.6 California Department of Transportation (Caltrans) District 7

2.6.1 Comment Letter

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 266-3562
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life

July 15, 2024

Dennis Santos
City of Long Beach, Utilities Dept.
1800 E. Wardlow Rd.
Long Beach, CA 90807

RE: Haynes Generating Station Sewer Force
Main: Mitigated Negative Declaration
(MND)
GTS # 07-LA-2024-04559
SCH # 2024060684
Vic. LA 22 PM 1.455
LA 405 PM 0.113
LA 605 PM 0.075

Dear Dennis Santos:

Caltrans-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The Project includes the construction of a new 12-inch diameter sewer force main that would extend from Los Angeles Department of Water Power (LADWP) Haynes Generating Station (HGS) to an existing Los Angeles County Services District (LACSD) 42-inch sewer main located at the LACSD's Long Beach Water Reclamation Facility. The Project would facilitate the beneficial reuse of up to 2.766 million gallons per day (MGD) of industrial wastewater discharge and 0.075 MGD of on-site stormwater runoff (for a total of 2.841 MGD) from the HGS to LACSD's Long Beach Water Reclamation Facility. Total pipeline installed would be 17,000 feet using a combination of trenching and trenchless construction methods. A flow control/pressure reducing station consisting of an above grade or partially buried structure not to exceed 300 square feet would be constructed at or adjacent to the Long Beach Water Reclamation Facility. In addition, the HGS is currently located outside the LACSD's adopted sphere of influence. Therefore, as part of the Project, the LACSD proposes to expand its service area boundary to include the HGS and annex the HGS property into the LACSD Sanitary District Number 19. This action would not entail any changes to existing City zoning. The City of Long Beach is the Lead Agency under the California Environmental Quality Act (CEQA).

Caltrans-2

The closest state facilities are SR 22, SR 405, and SR 605. After reviewing the project's documents, Caltrans has the following comments:

Caltrans-3

Caltrans will require an Encroachment Permit for work performed within the State Right-of-way. Caltrans recommends that large-size truck travel and construction traffic be

Caltrans-4

"Provide a safe and reliable transportation network that serves all people and respects the environment."

Dennis Santos
July 15, 2024
Page 2 of 2

Caltrans-4

Caltrans-5

Caltrans-6

limited to off-peak commute hours. Caltrans requires a permit for any heavy construction equipment and or materials that require the use of oversized transport vehicles on State highways. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review.

If you have any questions, please feel free to contact Jaden Oloresisimo, the project coordinator, at Jaden.Oloresisimo@dot.ca.gov and refer to GTS # 07-LA-2024-04559.

Sincerely,



Anthony Higgins
Acting LDR/CEQA Branch Chief

cc: State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment."

2.6.2 Responses to Comments

Below are LBUD's responses to the comments received from the California Department of Transportation (Caltrans) for the Draft IS/MND on July 15, 2024.

- Caltrans-1** This comment provides introductory remarks and a brief description of the proposed Project and does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/MND.
- Caltrans-2** This comment identifies the closest state facilities as SR 22, SR 405, and SR 605. This comment is correct. The comment states a fact and does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/MND.
- Caltrans-3** This comment states that Caltrans will require an Encroachment Permit for work performed within the State Right-of-Way. LBUD acknowledges this comment and notes that a Caltrans Encroachment Permit is listed in Table 2-1, Potential Regulatory Agency Approvals and Permits, in the Draft IS/MND. LBUD understands that an Encroachment Permit from Caltrans will be required before any construction work is performed within the State Right-of-Way.
- Caltrans-4** This comment recommends that large-size truck travel and construction traffic be limited to off-peak commute hours. LBUD acknowledges this comment. As explained in Section 3.XVII, Transportation, of the IS/MND, with the implementation of MM TR-1, LBUD will prepare a traffic control plan that limits construction-related transport activities to off-peak commute hours when feasible.
- Caltrans-5** This comment states that Caltrans requires a permit for any heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways. LBUD acknowledges this comment and will obtain a permit if any Project components require the use of oversized transport vehicles on State highways.
- Caltrans-6** This comment requests that a construction traffic control plan is submitted for Caltrans' review if construction traffic is expected to cause issues on any State facilities.
- LBUD appreciates Caltrans' input. TR-1 lists Caltrans as one of the agencies to be coordinated with during the preparation and review of the Project's traffic control plan. LBUD will provide Caltrans the opportunity to review and comment on the traffic control plan for each phase of Project construction and will notify in advance of street closures, detours, or temporary lane reductions.

This page is intentionally blank.

3 Revisions to Public Review Draft IS/MND

This section consists of text revisions to the Public Review Draft IS/MND as a result of agency comments received during the Project's public review period. The text revisions clarify, amplify, or make minor modifications to the Public Review Draft IS/MND. None of the revisions will result in new environmental impacts or cause any potentially significant effects on their own. The text revisions would be considered insignificant modifications to the Public Review Draft IS/MND, and thus would not require recirculation of the document (State CEQA Guidelines Section 15073.5).

All revisions to the Public Review Draft IS/MND are provided below under the relevant Public Review Draft IS/MND section. Text deletions are shown with ~~strike through~~, and text additions are shown with underline.

The following minor revision was made throughout the IS/MND, starting on page 1 under Environmental Checklist Form:

The Project consists of a new sewer force main that would be constructed by LBUD within its current service area and designed to convey up to 2.841 million gallons per day (MGD) of flow from LADWP's HGS to Los Angeles County Sanitation District's (LACSD) Long Beach Water Reclamation ~~Facility~~ Plant (WRFP).

The following minor revision was made to page 7 under Section 2, Project Description, of the IS/MND:

A small portion of the Project is in the City of Seal Beach, California. For the purposes of characterizing existing conditions, a Project Study Area was defined to encompass the Project construction footprint and adjacent properties. The Project Study Area is roughly bounded by North Studebaker Road to the west, East Willow Street to the north, State Route 22 (SR-22) to the south, and Interstate 605 (I-605) to the east.

The following minor revision was made to page 11 under Section 2, Project Description, of the IS/MND:

Tertiary-treated effluent is discharged from the Long Beach ~~WRPF~~ to Coyote Creek at the discharge point 001 (LA-RWQCB Order Number R4-2022-0032, NPDES Permit No. ~~CA0000353~~ CA0054119).

The following minor revision was made to page 20 under Section 2, Project Description, of the IS/MND:

The proposed annexation includes the three parcels previously identified covering 129 acres (Assessor Identification Numbers 095-681-19, 7237-018-270, and 7237-019-270). The SOI amendment and annexation of the HGS property into the LACSD's Sanitary District Number ~~349~~ service area would reduce the OCSD service area boundary by 6.8 acres (APN Number 095-681-19) and increase LACSD's Sanitary District Number ~~349~~ service area boundary by 129 acres.

The following minor revision was made throughout the IS/MND, starting on page 13 under Section 2, Project Description:

- Objective 4. Annex LADWP's HGS into LBUD's and LACSD's District Number ~~49~~ 3 service areas, as required, and amend LBUD's and LACSD's Sphere of Influence (SOI), as required, to incorporate the HGS property.

The following minor revision was made to page 19 of IS/MND, under Section 2, Project Description:

The PRS would connect to an existing sewer main thereby converting the force main to gravity flow prior to the connection.

Figure 2-7 of the IS/MND is revised to show annexation of LADWP's HGS into LACSD's Sanitary Sewer District No. 3.

The following minor revisions were made to MM-BR-6 under Section 3.IV and Appendix E (MMRP) of the IS/MND:

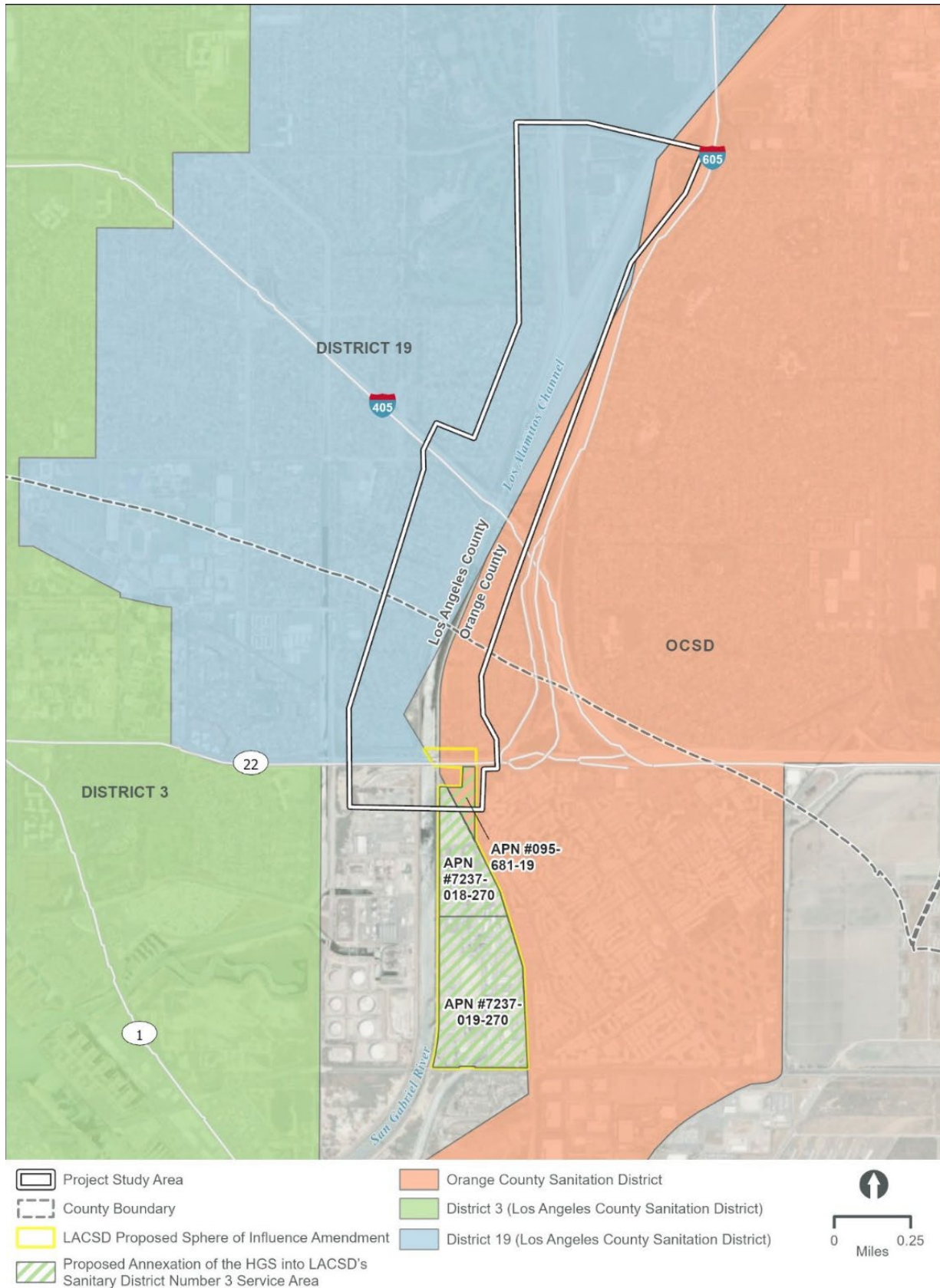
MM BR 6: Impacts to Trees Protected Under the City of Long Beach and City of Seal Beach Tree Ordinances.

Trees located on City of Long Beach and/or City of Seal Beach property require a tree trimming permit. If tree trimming or removal is required as part of the Project, the Project proponent shall acquire a tree trimming permit from the respective City. All conditions in the permit must be followed to be compliant with applicable City regulations. In some cases, the City arborist shall be engaged to ~~access~~ assess the significance of the tree being impacted as well as guide trimming crews to the extent of vegetation that can be removed to avoid tree mortality. In addition, if a tree is determined to be historically or culturally significant, avoidance is recommended.

The following minor revisions were made to page 76, Section 3.XIII, of the IS/MND:

Construction noise levels in the project vicinity would fluctuate depending on the particular type, number, and duration of equipment usage. The effects of construction noise largely depend on the type of construction activities occurring on any given day, noise levels generated by those activities, distances to sensitive receptors, and the existing ambient noise environment. Construction generally occurs in several phases, with each phase requiring different equipment with varying noise characteristics. Residences and park areas within 50 feet of construction in the Cities of Long Beach and Seal Beach could experience maximum noise levels during construction, as shown in Table 3.7.

Figure 1-7. Proposed SOI Amendment and HGS Annexation



The following minor revisions were made to MM-TR-1 under Section 3.XVII and Appendix E (MMRP) of the IS/MND:

MM TR 1: Prepare Standard Traffic Control Plan (TCP).

During the final engineering phase and at least 30 days prior to construction, a construction TCP shall be prepared by the contractor and reviewed and approved by the lead agency, City of Long Beach/LBUD.

The lane/street and bike trail closures in the construction TCP shall be coordinated between the construction contractor, private businesses, public transit and bus operators, emergency service providers, and residents to minimize construction related vehicular traffic impacts. During planned closures, traffic shall be rerouted to adjacent streets via clearly marked detours and notice shall be provided in advance to applicable parties (nearby residences, emergency service providers, public transit and bus operators, the bicycle community, businesses, and organizers of special events). The TCP shall identify proposed closure schedules and detour routes, as well as construction traffic routes, including haul truck routes, and preferred delivery/haul out locations and hours so as to avoid heavily congested areas during peak hours, where feasible. The following provisions shall be included in the TCP:

- Access to adjacent residences and public parks shall be maintained during business hours via existing or temporary driveways, and residences at all times, as feasible.
- Advance notice signs shall be posted prior to construction in areas where access to residences could be affected.
- Los Angeles Department of Transportation, Long Beach, Seal Beach, and Caltrans shall be provided an opportunity to review and comment on the TCP for each phase of Project construction and notified in advance of street closures, detours, or temporary lane reductions. No full road closures of College Park Drive are allowed.
- Construction activities will occur outside of peak hours.
- Proposed detour routes for pedestrian and bicycle traffic along San Gabriel River Bike Trail if required.
- Emergency access shall be accommodated throughout construction.

The following minor revisions were made to page 95, Section 3.XIX, of the IS/MND:

Furthermore, the Long Beach WRP has a design capacity to provide primary, secondary, and tertiary treatment for 25 MGD of wastewater. The plant currently treats approximately 18 MGD of wastewater to a tertiary level to produce recycled water with an average daily flow of 11.4 MGD. An increase of 0.003 AFY of effluent to be treated at the Long Beach WRF would be nominal and would not result in an overcommitment to existing service capacity. Additionally, LACSD's 42-inch Joint Outfall – Unit 8A Trunk Sewer has a capacity of 18.6 MGD and conveyed a peak flow of 7.1 MGD in 2020. As such,



impacts would be less than significant, and no mitigation measures are required.