

SANDRA GENIS, PLANNING RESOURCES

1586 MYRTLEWOOD

COSTA MESA, CA. 92626

PHONE/FAX: (714) 754-0814

January 20, 2000

Brad Wetstone
California Public Utilities Commission
c/o Aspen Environmental Group
30423 Canwood St., Suite 215
Agoura Hills, Ca. 91301

Subject: Bolsa Chica Water Line & Wastewater Project EIR

Dear Mr. Wetstone:

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Report for the Bolsa Chica Water Transmission Line and Wastewater Service Project (SCH # 99071049), although I wish to reiterate my request for an extension to the review period, per my letter dated January 8, 2000 (attached). These comments are submitted on behalf of myself and the Bolsa Chica Land Trust. I am a member of the Bolsa Chica Land Trust Board and the Board has requested that I comment on the DSEIR on its behalf.

This document is a supplemental EIR to the Environmental Impact Report for the Bolsa Chica Project Local Coastal Program (SCH # 93-071064) certified in 1994 and recirculated in 1996. As such, the document and the process recognize that the proposed water transmission line and wastewater services proposal are integral components of the over all Bolsa Chica project. Indeed the project objectives are to:

- Provide a reliable, long-term water supply to the Bolsa Chica Planned Community.
- Construct a water transmission system designed to meet the ... needs of the Bolsa Chica Planned Community.
- Ensure adequate and reliable wastewater collection and disposal system for the Bolsa Chica Planned Community.

13-1

The DSEIR states that "...the provision of water and wastewater service ...is considered a vital factor in allowing plans for development to proceed" (p. ES-5). The DSEIR also states that the it "is not intended to reevaluate any components of the Bolsa Chica Planned Community project previously examined int the *Bolsa Chica Report* [sic] *Local Coastal Program EIR*" (p. A-8).

Section 15162 of the CEQA Guidelines requires preparation of an additional EIR for a project if:

- (1) Subsequent changes are proposed in the project ...due to the involvement of new significant environmental impacts not considered in a previous EIR or Negative Declaration on the project;

- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken ... due to the involvement of new significant environmental impacts not covered in a previous EIR or Negative Declaration; or
- (3) New information of substantial importance to the project becomes available, and
 - (A) The information was not known and could not have been known at the time the previous EIR was certified as complete..., and
 - (B) The new information shows any of the following:
 1. The project will have one or more significant effects not discussed previously in the EIR;
 2. Significant effects previously examined will be substantially more severe than shown in the EIR;
 3. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project; or
 4. Mitigation measure or alternatives which were not previously considered in the EIR would substantially lessen one or more significant effects on the environment.

13-1

Thus, the DSEIR should examine not only the provision of water and wastewater service, but should examine any other changes in the project, changes in environmental conditions, or new information as they may affect the impacts, mitigation measures and alternatives for the Bolsa Chica Project as a whole. These include:

- Increased uniqueness/significance of on-site archaeological resources due to loss of cultural resources at the Newporter North site (CA-ORA 64) in Newport Beach per the attached letter from the Smithsonian Institute.
- Recent discovery of human remains during grading on the immediately adjacent Sandover development site.
- Information on location, configuration, size and disruption to the surrounding area of outfall pipes which only became available upon Freedom of Information Act review of an application for discharge permission for the pipes. The application was filed subsequent to 1996 certification of the recirculated EIR. Disruption includes elimination of pickleweed habitat and impairment of foraging areas for endangered species.
- Purchase of lowlands/wetlands by the State of California for a mitigation and wetlands restoration area, rendering impacts on this area, e.g. from urban runoff, pets, and other activities, to be of increased significance.

S. Genis
2 of 18

- Degradation of surface water quality in Huntington Beach leading to beach closure.
- Improvements in water quality control technology.
- Pending studies and requirements for adoption of limits for Total Maximum Daily Loads for water bodies.
- Changes in background traffic levels.
- Updates in Orange County traffic modelling.
- Changes in cumulative development anticipated in the area, including Walmart, Hellman Ranch, revised intensity and type of development planned for Bixby Ranch, and development currently in the application process for oil fields in the Santa Ana River Mouth area.
- New information on the health effects and need for control of particulates in the PM_{2.5} range.
- Documentation of a new earthquake fault in Orange County.

13-1

For purposes of this DSEIR, the California Public Utilities Commission has been identified as the Lead Agency. Section 21002.1 (d) of the Public Resources Code (CEQA) states that:

A public agency functioning as a lead agency shall have responsibility for considering the effect, both individual and collective, of all activities involved in a project. A public agency functioning as a responsible agency shall have responsibility for considering only the effects of those activities involved in a project, which it is required by law to approve.

Thus, the CPUC may not limit the scope of the DSEIR to only those matters within its own scope of authority.

In a number of cases, the DSEIR defers further investigation of impacts and/or mitigation measures to other agencies or to future studies or permits. These include future traffic control plans, identification of bike trails, identification of pedestrian walkways, further investigation of potential for contaminated soils, geotechnical investigations, and water quality control measures. Because most of this will be reviewed at an administrative level, often by other agencies, the public and, to a large extent, the Commission is essentially shut out of the review process for these aspects of the project.

13-2

This flies in the face of the full disclosure requirement which is the heart of CEQA. As stated in the CEQA Guidelines (Section 15003):

S. Genis
3 of 18

The EIR serves not only to protect the environment but also demonstrate to the public that it is being protected...The EIR is to inform other governmental agencies and the public generally...The EIR is to demonstrate to an apprehensive citizenry that the agency has...considered and analyzed the ecological implications..."

It would be understandable if the applicant were reluctant to expend resources on such activities as boring or trenching without even knowing whether permission to serve would be granted. It is conceivable that investigations requiring ground disturbance might potentially result in impacts to factors such as sensitive vegetation if pursued without any prior study. However, many of the items deferred, such as records searches and visual inspections could occur with no site disturbance. Other investigations, such as identification of bike routes, could be accomplished with minimal effort. In any case, the expenditure of effort must be considered in the light of the need for the decision making body to have full and useful information on the project and the public's statutory right to be informed.

13-2

Further, deferral of discussion of impacts and mitigation to another agency creates a peculiar circular system whereby the agency issuing a permit, as a responsible agency, is supposed to utilize an environmental document prepared by a lead agency which defers consideration of impacts and mitigation measures back to the responsible agency. For example, page B-37 indicates that "this Supplemental EIR is intended to provide CEQA clearance for all of the permits approvals listed in Table B.9-1". Table B.9-1 lists the NPDES permit to be issued by the Regional Water Quality Control Board. Section C.6 indicates that discharge should not be a problem because the project will be required to obtain an NPDES permit. At a minimum, the DSEIR should include the information which would be required by the responsible agencies listed in B.9-1 for their permitting processes if this DSEIR is to be useful to the issuing agency, other responsible agencies, and the public.

Where items are deferred to future administrative review or to other agencies, how will the Public Utilities Commission and the public be informed of further action regarding these matters? How will the Commission and the public be provided the opportunity to review further studies/actions? How will the Commission and the public be afforded the opportunity to comment upon these studies/actions? How can the public appeal administrative decisions regarding further studies and plans?

The DSEIR establishes criteria for significance for each impact. Where criteria are based on standards adopted legislatively or developed by regulatory agencies such as South Coast Air Quality Management District, this is appropriate. Likewise, it is helpful to have concrete standards based on widespread practice. However, in some cases, the criteria seem to be specifically tailored to reflect the characteristics of the project and applicant, such as Section C.6, or to minimize the significance of impacts, such as Sections C.9 and C.10. Specific comments regarding criteria are included under each section below.

13-3

In reviewing potential impacts of the proposed project, the DSEIR notes in a number of sections that the potential impact has been reduced to a level of insignificance because the applicant "proposes" or "has committed to" certain actions. For example Section C.6 indicates that the applicant has committed to certain standards, monitoring, and mitigation. There is also

13-4

S. Genis
4 of 18

reference to commitment to measures which would avoid impacts to water quality (though this is open to question per Hydrology Comment No. 14). The discussion then goes on to indicate that no impacts will occur and thus no mitigation measures are necessary, because of these commitments. However, no assurance is given that these "commitments" will be implemented.

Section 4 indicates that health and safety plans will be prepared to protect employees and the general public from environmental contaminants, but this is not listed as either a "commitment" or a mitigation measure. Section 8 indicates that impacts on southern tarplant would be reduced by a project design feature.

Although Section 15126 of the CEQA Guidelines states that mitigation measures proposed by an applicant should be distinguished from other measures, they are all still mitigation measures. In 1988, the California Legislature passed AB 3180, effective January 1, 1989, which required that mitigation monitoring programs be prepared. This was in response to a number of studies which indicated that, in fact, many public agencies did not verify implementation of mitigation measures.

13-4

If a proposed action is adopted as a mitigation measure, it will be included in the monitoring program with specific agency responsibility assigned to see that the measure is implemented. This is designed to increase the likelihood that the mitigation will actually occur. If the proposed action is merely an applicant "commitment", there is no means of assuring implementation. Likewise a project design feature may change or be deferred. Unless the change was determined by a public agency to be so significant that a new EIR was required, the impact the feature was intended to address could remain unmitigated.

The use of commitments and design features could be utilized as a means of doing an end run around the requirements of AB 3180. It is thus essential to formally include as mitigation measures all measures identified as reducing the potential negative effects of a project. This will assure decision makers and the general public that all actions said to reduce the significance of a potential impact in an EIR will actually be implemented.

In addition to these broader issues, I have the comments and questions below on the information presented. These items must be addressed in order for the DSEIR to be considered adequate and to provide decision makers and the public with the information needed to evaluate the proposed project and its impacts.

Public Review

The public review process not only provides an opportunity for "an apprehensive citizenry" to observe and participate in the appraisal of a proposed project, it affords decision makers with input which may be useful, or even critical, in evaluating a project and its impacts. It is thus important that all affected and interested individuals, agencies and other entities receive notice at milestones in the environmental process. It is equally important that the decision makers and receive all input submitted by the public. Thus, the following must be provided:

13-5

1. Copies of responses to the NOP or other notices in the scoping process.

S. Genis
5 of 18

- 2. Transcripts or, at a minimum, detailed minutes of the scoping meetings for the DSEIR.
- 3. Transcripts of project questions and comments offered on the Telephone Information Line for the Bolsa Chica Water Line and Wastewater Project, which invites callers to comment. 13-5
- 4. List of all individuals notified of the scoping process for this project.
- 5. A copy of the Notice of Completion for the DSEIR along with a list of those notified of the completion and availability of the document.

Project Description

The project description is the most basic and important factor in preparing an adequate EIR. A vague or ambiguous project description will render all further analyses and determination ineffectual. It is critical that the project description be as clear and complete as possible so that the issuing agency and other responsible agencies may make informed decisions regarding a proposed project. The following issues must be addressed and other analyses in the EIR adjusted accordingly.

- 1. Adoption of a precise pipeline alignment is not among those items identified by the Assigned Commissioner to be addressed the Public Utilities Commission proceeding on the Southern California Water Company application (p. A-8). Will the adoption of the precise alignment be a part of the action? If the alignment changes, will additional Commission approval, environmental documentation and public participation be required? 13-6

- 2. Please provide more information about Southern California Water Company's water rights and usage as a whole. Specifically:

- What is the project applicant's current entitlement for water use, both for imported water and groundwater pumping? 13-7
- Are these entitlements in perpetuity?
- How much of that entitlement is currently committed?
- Are these commitments in perpetuity?
- What other new commitments is SCWC currently contemplating?

- 3. What is the capacity, in gallons per minute, of the proposed water transmission line? 13-8

- 4. What area does the existing SCWC twelve inch pipeline at Orangewood Ave. and Valley View Avenue currently serve? What is the current water demand supplied by this maximum 750 gpm line? 13-9

- 5. What is the distance between Segment 1 and the nearest residential lot or public park? 13-10

- 6. Why does the pipeline alignment change lanes back and forth in northbound Bolsa Chica in Segments 6, 7, 8, and 9? Isn't this potentially more disruptive? Will both northbound lanes have to be closed as the alignment transitions between lanes? 13-11

S. Genis
6 of 18

7. What type of pipeline coating will be utilized to protect above ground portions of the water transmission line? | 13-12
8. Will Segment 10 remain on private property or in the public right-of-way after full dedication and improvement of Los Patos Avenue? | 13-13
9. An elevation showing the water treatment facility and pumping area as seen from Los Patos Avenue and the adjacent homes should be provided. | 13-14
10. How can the reservoir be filled at a rate of 1,632 gpm when the line supplying the Bolsa Chica Water Transmission Line flows at only 750 gpm, a portion of which is already devoted to other uses? | 13-15
11. How many hours a day will the on-site water distribution pumps operate? | 13-16
12. The groundwater basin has been subject to overdraft, and groundwater pumping rights are very carefully allocated. Would pumping from the on-site wells count against the SCWC allocation of pumping rights in the groundwater basin? If not, whose allocation would this count toward? | 13-17
13. What would be the impact on other facilities of interconnection with the proposed water line? Will any such future interconnections be subject to Commission approval, public review and environmental documentation? | 13-18
14. What will be the distance between the nearest home and the wellhead treatment facility, including ammonia and chlorine storage? | 13-19
15. The proposed wastewater lift station is located in close proximity to an environmentally sensitive area and is in an area tentatively recommended for no development by Coastal Commission staff. What alternate location would be considered for the lift station? | 13-20
16. If the lift station is relocated, would this be subject to Commission approval, environmental documentation and public review? | 13-21
17. What will be the peak wastewater flow in gpm? How does this compare to the capacity of the proposed lift station? | 13-22
18. An elevations of the sewer lift station as seen from Warner Avenue eastbound, approaching from Pacific Coast Highway and from development across Warner Avenue should be provided. | 13-23
19. Please verify hours of construction and adopt permitted construction hours as a condition of approval. Although Page B-26 indicates hours will be between 7:00 a.m. and 6:00 p.m., other portions of the report indicate that these will "typically" or "generally" be the hours. How often will hours be "atypical"? | 13-24

S. Genis
7 of 18

20. Do hours of construction include delivery of pipe and/or construction equipment? If not, the DSEIR must examine the potentially disruptive impacts of these activities in pre-construction and post-construction hours. | 13-25
21. The DSEIR references staging areas, staging yards, and stockpile areas in a number of locations (p. B-26, p. C.2-10, p. C.3-11, p. C.6-15). On the other hand, the DSEIR also indicates that workers will arrive individually (p. C.1-11) and that no staging area will be utilized (p.B-26). This is peculiar in that during utility line construction in public streets, it is not uncommon for a staging area for storage of construction materials and equipment--or excavated materials--to be established in an adjacent or nearby area such as a vacant lot or unused parking lot. This must be clarified inasmuch as any staging area will have its own set of impacts that must be examined as a part of this environmental review process. | 13-26
22. If no staging area is to be provided in the local area, will equipment and supplies be moved between the construction area and remote locations before and after each work day? Where will these remote storage areas be located? Will excess pipeline be stored at the same location as equipment? Impacts of the daily transport of equipment and materials should be examined. | 13-27
23. If a local staging area is to be provided, where will it be located and what will be the impacts on the staging area itself and the surrounding community? | 13-28
24. What local water sources will be used to control fugitive dust and test water lines? How much water will be needed? This must be clarified as it is not unheard of for public works contractors to use nearby domestic water sources without the permission of property owners. | 13-29
25. How many truck loads of broken debris will be removed during construction? | 13-30
26. What are the haul routes for removal of debris? | 13-31
27. What types of "the equipment" for pipe handling and laying will be used at the discretion of the contractor (p. B-30)? What are the impacts of this equipment? | 13-32
28. If water used for pressure testing is discharged to a storm sewer, which storm sewer will be utilized? How much water will be discharged? | 13-33
30. Where and how will water used for pressure testing, pipe flushing, and/or disinfection be dechlorinated and aerated? This must be identified and impacts of this activity examined. | 13-34
31. How many cubic yards of earth will be removed for construction of the reservoir and associated water service equipment? | 13-35
32. Where will excess material be placed and what are the haul routes? | 13-36
33. How large a surface area will be disturbed during construction of the reservoir and associated water service equipment? | 13-37

S. Genis
8 of 18

- 34. Where will disinfection water for the reservoir be discharged? | 13-38
- 35. To report leaks or equipment malfunctions, the SCWC office and phone number should be accessible to all nearby residents, not just SCWC customers. | 13-39
- 36. What type of permit will be required for the pipeline to cross the United States Navy Railroad tracks south of Westminster Boulevard? | 13-40

Air Quality

- 1. Is data for wind patterns collected for Los Alamitos Armed Forces Reserve Center which is adjacent to the project site? Is it available to the Commission? | 13-41
- 2. What will be the impact on air quality, including total emissions and potential for hot spots, due to roadway congestion resulting from project construction? This should include increased emissions due to detours as well. | 13-42
- 3. The calculations of Estimated Maximum Daily Pipeline Construction Emissions appear to be based on use of equipment for fifty percent of an eight hour day, per Appendix 4. If construction hours are between 7:00 a.m. and 6:00 p.m., that is a thirteen period. This must be reconciled. | 13-43
- 4. If no local staging area is to be provided, the off-site construction emission should be based on transport of the amount of equipment shown in Tables 1 and 2 of Appendix 4. Table 3 of Appendix 4 reflects less than two trip ends per construction spread for all equipment and supplies. This must be reconciled. | 13-44
- 5. Sensitive receptors in proximity to the proposed pipeline alignment should be identified. | 13-45
- 6. The evaluation of impacts on particulates should reflect fugitive dust in addition to equipment emissions. Although watering of exposed surfaces can reduce dust, in reality construction sites still generate dust. Even levels of dust that do not constitute a defined health hazard create a nuisance that should be mitigated. | 13-46
- 7. How will emissions, such as carbon monoxide and particulates, adjacent to residential uses and a park affect those with respiratory problems such as asthma or emphysema? will any special provision be made for these individuals? | 13-47
- 8. Although there is currently no Attainment Plan for PM_{2.5}, these small particulates have been identified as a health issue. This should be addressed in the context of the proposed project and nearby uses. | 13-48
- 9. What is the potential for hazardous air pollutant discharges of chlorine, ammonia or other materials due to construction and operation of the proposed facility? What would be the impacts? | 13-49

S. Genis
9 of 18

Noise

1. Residential uses should be considered sensitive receptors. | 13-50
2. Criteria for significance should be revised to reduce the time for which an increase in 15 dB would be considered acceptable. Twelve hours includes most of the day. Six to eight hours would be annoying enough. | 13-51
3. The applicant proposes to notify residents of any pile driving activities. Are such activities planned? Where? | 13-52
4. Where limitations on construction hours differ, mitigation measures should state that the strictest standard will apply. | 13-53
5. Will equipment, supplies, or debris be delivered or removed from the site before or after normal working hours? How early in the morning or late into the evening will this occur? | 13-54
6. Are the equipment noise levels presented in Table C.2-8 for equipment with or without mufflers? How much, in dBA, would noise be reduced for equipment with mufflers? | 13-55
7. How can noise levels at receptors eight to thirteen feet from the project, i.e. residential lots, be predicted at 70 dBA to 80 dBA in the DSEIR when the DSEIR also states that the noise level from construction activity would be 80 dBA at fifty feet? | 13-56
8. In some sections, the pipeline right of way will be as close eight feet to the nearest residential property lines. What will be the noise level for those homes? Anticipated noise level to the nearest residential lot or other sensitive use along the various stretches of the pipeline route should be calculated. | 13-57
9. How do the noise levels calculated for the residential properties compare to acceptable levels under OSHA? How would the residents be affected? | 13-58
10. The location of the pipeline in the street is typically located on the residential side of the street. Could impacts be reduced by relocating the line to the other side of the street? | 13-59
11. The agency responsible for enforcing the noise ordinance in each area should be identified. | 13-60
12. While nearby residents and businesses should certainly be notified of future construction activities, this will not reduce noise in the area nor reduce noise exposure for those unable to relocate to another area. What will be done to make noise levels more tolerable for those who must remain? | 13-61
13. What steps will the community liaison take to reduce construction noise? Will the community liaison have the authority to halt construction temporarily? Is this just an opportunity for the residents to vent? | 13-62

S. Genis
10 of 18

14. An additional construction mitigation measure should be considered requiring temporary relocation assistance or provision of noise reducing earphones for those individuals considered highly sensitive, e.g. small children, elderly, individuals with health problems, etc. | 13-63
15. How many hours a day will water pumps and sewage lift pumps operate? What level of noise would be generated? | 13-64
16. Will any impacts occur due to noise generated at frequencies that create greater annoyance or discomfort even when below normally acceptable noise levels for other frequencies? | 13-65
17. How will the movement of heavy equipment and trucks transporting materials to and from the construction sites and soil stockpile area affect noise levels along haul routes? | 13-66
- Traffic and Circulation**
1. What is considered an adverse change in roadway system levels? | 13-67
2. Acceptable roadway system levels should be addressed in the light of local circulation elements, Congestion Management Plans required under Proposition 111 and Growth Management Plans and Growth Management Elements required under Measure M. | 13-68
3. Which cities will require transportation management plans? | 13-69
4. Will these plans be subject to Commission review and approval? Will public have the opportunity to review and comment? Will the Commission and the public be notified that such plans are available? | 13-70
5. What will happen in those cities that do not require transportation management plans? | 13-71
6. Reference is made to "typical standards and techniques". What are some of those typical standards and techniques? | 13-72
7. At what time of day will heavy equipment and supplies such as pipeline be transported to the site and maneuvered into position from the traffic lanes? Will this affect peak hour? | 13-73
8. How many oversize vehicles will move on and off site each day? | 13-74
9. What are the anticipated haul routes for broken debris and other excavated materials and how will traffic along these routes be affected? | 13-75
10. Who will be responsible for enforcement of adopted traffic management plans? | 13-76
11. How can the Commission and the public be assured that the plans will be adequate and will be implemented? | 13-77

S. Genis
11 of 18

- | | |
|--|-------|
| 12. Seven day notification of construction activities is too short for businesses. Some disrupted businesses may have to find alternate parking for large numbers of employees and patrons. They may wish to notify patrons in advance. A minimum two week notice is needed. | 13-78 |
| 13. At what locations is it not possible to avoid blocking bus stops? What alternate locations are feasible from a standpoint of functionality and availability? | 13-79 |
| 14. Are alternate bike routes at least a quarter mile away really feasible for those using bicycles for transportation? | 13-80 |
| 15. At what locations is it anticipated that bike routes would share the automobile traffic lanes? | 13-81 |
| 16. How will excavation and patching affect the expected useful life of street pavement? It has been the experience of some cities that such activities significantly reduce the life of the street. What repaving techniques will be utilized to ensure streets are not degraded? | 13-82 |
| 17. While construction along a number of segments simultaneously will reduce construction times, it could also impede the ability of detoured drivers to return to their original routes. How will this be avoided? | 13-83 |
|
<u>Environmental Contamination</u> | |
| 1. Have appropriate personnel at the U.S. Naval Weapons Center, Los Alamitos Armed Forces Reserve Center and Boeing Company been contacted regarding potential hazardous sites? | 13-84 |
| 2. Significance criteria should include potential release of toxic or hazardous materials utilized in construction and operation of the proposed project. | 13-85 |
| 3. Literature review and visual inspection should be completed as a part of this environmental review and further action or mitigation discussed as a part of this environmental review, prior to a final decision on the proposed project. | 13-86 |
| 4. Will health and safety plans be subject to Commission review and approval? Will the public have an opportunity to review and comment? How will they be notified? | 13-87 |
| 5. Will monitoring be conducted continuously during trenching? | 13-88 |
| 6. Will testing equipment be provided and utilized at all three stretches of construction? | 13-89 |
| 7. Sites where toxic or hazardous materials may be placed are few and far between. Where will contaminated materials be taken for treatment or disposal? | 13-90 |
| 8. The risk of contamination by chlorine, ammonia, or other compounds during construction and operation of the proposed project should be discussed. | 13-91 |

S. Genis
12 of 18

Geology and Soils

- 1. What will investigations to document anticipated offset for the North Branch, Bolsa-Fairview, and Los Alamos faults entail? | 13-92
- 2. What types of design features could mitigate fault rupture? | 13-93
- 3. How will dewatering of shallow aquifers affect nearby soil stability? | 13-94

Hydrology and Water Quality

- 1. Rainfall data should be provided for more than just one year which had unusually low rainfall. | 13-95
- 2. What is the design capacity of each of the points along the Bolsa Chica and Anaheim Barber City Channels presented in the DSEIR? To what extent has that design capacity been reduced due to siltation? | 13-96
- 3. The DSEIR indicates that "generally the Meadowlark and Main aquifers have not been impaired by seawater intrusion" and that "there is little data to indicate seawater intrusion impacting the Meadowlark and Main aquifers". What such data does exist? Are there portions of the aquifers that show evidence of impairment? | 13-97
- 4. Best Available Technology, versus the less advanced Best Management Practices, should be utilized to minimize degradation of water quality. | 13-98
- 5. Significance criteria should include any impairment of beneficial uses of surface or groundwater. | 13-99
- 6. Significance criteria should include discharge of sediment into any storm drain, storm channel or other surface water body. | 13-100
- 7. Significance criteria should include discharge of any toxic or hazardous material into any storm drain, storm channel or other surface water body or groundwater. | 13-101
- 8. Significance criteria should include any contribution to further degradation of an impaired water body. | 13-102
- 9. Significance criteria should be revised to include failure of channel integrity due to any construction or operational activity associated with the proposed project, not just restricted to leaks. | 13-103
- 10. How much groundwater is anticipated to be discharged to surface water channels? | 13-104
- 11. What is known regarding the quality of water to be discharged and how will quality be monitored as water is encountered? | 13-105

S. Genis
13 of 18

12. Although coastal southern California is relatively dry, rainfall is understated by citing the 1998-1999 year as a "typically minimal" year for rainfall. The unusually dry conditions are noted on page C.8-3. | 13-106
13. Merely quoting the applicant's statement that there will be no impact (P. C.6-14) does not constitute an impact analysis. The EIR should provide an independent analysis which is supported by evidence presented in the EIR. | 13-107
14. How long will soil be stockpiled? Overnight? A week? | 13-108
15. Will the stockpile site be paved? If so, how does the applicant propose to anchor and entrench the hay bales? Provision of fiber rolls instead of hay bales would generally be expected to provide superior containment of sediment. | 13-109
16. Page C.6-16 indicates that the applicant "has committed" to certain BMP's and that would "typically" reduce sedimentation. The citation given is the SCWC Proponent's Environmental Assessment (PEA). By contrast, page C.6-14 indicates no particular commitment, stating:
- ...the PEA does not specifically list proposed measures, the applicant states herein that typical construction practice for erosion control and BMPs would minimize discharge to surface waters and avoid impacts. | 13-110
- These statements should be reconciled. In order to avoid confusion in the future, "commitments" incorporated should be adopted as mitigation measures.
17. Please identify which BMPs are proposed for implementation. | 13-111
18. While site watering will reduce dust, it can also result in increased mud. What are plans for cleaning accumulated dust, dirt, and mud from truck wheels and wheel wells as such equipment leaves construction or stockpile sites? | 13-112
19. Where will water utilized for pressure testing, pipe flushing and disinfecting be discharged? | 13-113
20. What will be the level of chlorine or other chemicals in this water? | 13-114
21. What will be the effect on quality of receiving waters? | 13-115
22. What volume of groundwater pumping is anticipated for the groundwater well or wells? Would potential maximum yield be fully utilized? | 13-116
23. What will be the effect of pumping on drawdown of the aquifer and potential saltwater intrusion? This should be quantified to the extent feasible. | 13-117

S. Genis
14 of 18

24. If reclaimed water is utilized for on-site landscaping, what steps will be taken to ensure that there is no runoff of gray water to environmentally sensitive areas? What will be the impact of such runoff? | 13-118
25. Please clarify proposals relating to berm-top elevation surveys and the subsurface wall. To what berm does this refer? Where would the subsurface cutoff wall be located? | 13-119
- Cultural Resources
1. How will the proposed reservoir and pump station affect cultural resources? | 13-120
2. Could the pipeline be re-aligned and the reservoir and pump station be relocated to avoid cultural resources? | 13-121
3. Should the pipeline or reservoir fail, what would be the impact on-site cultural resources? | 13-122
- Biological Resources
1. The significance criteria should also consider loss or degradation of any permanent or seasonal wetland to be significant. | 13-123
2. The area shown to be occupied by the end of the pipeline and proposed reservoir is potentially in an area of sensitive biological resources. It is difficult for an outsider to confirm the precise delineation of such resources due to the fence surrounding the Bolsa Chica Planned Community site. Will construction of the pipeline and reservoir affect any vernal pool or population of southern tarplant? | 13-124
3. Could the pipeline and reservoir be relocated to another portion of the site to avoid such impacts? | 13-125
4. The lift station appears to be in close proximity to Warner Pond. This sensitive resource has already been designated for preservation and, under coastal zone policies and regulations, should be buffered. How would the proposed pump station affect Warner Pond? | 13-126
5. How would Warner Pond be affected in the even of pump station failure? | 13-127
6. Could the pump station be relocated elsewhere on-site to avoid potential impacts? | 13-128
7. Page C.6-17 of the DSEIR indicates that the pipeline will run about ten feet from the bank of the Bolsa Chica Channel for a distance of 6,180 feet. How will noise, dust, air emissions, and general level of activity affect wildlife utilizing the channel and the fields adjacent to the channel? | 13-129
8. Where is it proposed that southern tarplant be replanted? | 13-130
9. Has replanting of southern tarplant been successful elsewhere? If so, where? | 13-131

Land Use and Recreation

1. The statement on page c.9-5 that "it is not anticipated that any federal agencies will have jurisdiction over the project" and Table B.9-1 which indicates that a construction easement will be needed from Los Alamitos Armed Forces Reserve Center must be reconciled. | 13-132
2. Significance criteria should be revised to include construction or operational activities which substantially conflict with or impair the enjoyment of recreational uses. | 13-133
3. Noise, dust and air emission associated with construction of the pipeline will substantially impair the enjoyment of Eucalyptus Park. This is a significant impact. | 13-134
4. Considering the width of driveway access to the golf course parking lot, will the lot be accessible during construction or will access be disrupted? | 13-135
5. How much will the capacity of the parking lot be reduced? How many spaces will remain? A reduction in available parking below typical needs would be considered a disruption to access. | 13-136
6. Loud noise is generally considered incompatible with golf. Construction noise on the golf course would be a significant impact. | 13-137
7. What measures could be implemented to reduce the magnitude of impacts to golf facilities? | 13-138
8. A mitigation measure should be included to coordinate construction around any special events, such as annual tournaments that may occur at the golf facilities. | 13-139

Public Services and Utilities

1. Cypress, Los Alamitos, Seal Beach, and Westminster provide fire service to their residents through the Orange County Authority, a joint powers authority funded by the member agencies and governed by the member agencies. | 13-140
2. Are there really only four stations providing paramedic service for all the areas investigated? Please verify. | 13-141
3. The Orange County Public Library provides administrative services, and library support activities such as warehousing at the Santa Ana location. There is no "central library" for Orange County. | 13-142
4. Significance criteria should include interruption of water service without warning for longer than fifteen minutes. | 13-143
5. Significance criteria should include interruption of other utilities without warning for more than thirty minutes. | 13-144

S. Genis
16 of 18

- 6. Significance criteria should include interruption of service, with warning, for more than two hours. | 13-145
- 7. Approximately how much solid waste, including material excavated or otherwise generated during construction or operation of the proposed facilities will require disposal? | 13-146
- 8. What will be the impact on landfill capacity? | 13-147
- 9. Approximately how great an increase in emergency response times could be anticipated, in a worst case scenario? | 13-148
- 10. Due to the relatively small number of paramedic teams identified, will paramedic response times be affected to a greater degree? | 13-149
- 11. How will simultaneous construction along the three stretches of roadway be coordinated to minimize effects on response times and ensure emergency access at all times? | 13-150
- 12. How will the ability of LAAFRC to respond to disasters be affected? In particular if Lampson and portions of Bolsa Chica Road were impeded how would response to areas south and east of the reserve Center be affected? | 13-151
- 13. Are there sensitive uses such as day care facilities or group homes for the elderly or infirm which would be more severely affected by interruption of utility service? | 13-152
- 14. Sensitive uses should be identified in advance through State licensing or other means and a program to mitigate impacts spelled out and adopted as a mitigation measure to this EIR to mitigate impacts. | 13-153
- 15. In a time when many homes have computers and computerized appliances, what steps will be taken to minimize and mitigate damage from power surges following interruption of power? Will a fund be established for replacement of damaged equipment? | 13-154

Section E

It should be noted that ability to comment upon some previously proposed water and wastewater facilities was limited by the level of detail provided and the scale of the maps indicating the facilities. | 13-155

Growth Inducement

While the proposed water line and wastewater facilities may not specifically induce growth of the Bolsa Chica Planned Community which is currently undergoing the approval process, provision of service will certainly enhance growth and the ability to build. | 13-156

Conclusion

I look forward to reviewing additional information which may be prepared or compiled as a part of this environmental review. As currently presented, the DSEIR does not provide adequate information to fulfill the purposes of CEQA.

Respectfully, it must be remembered that preparation of an environmental document is not merely an administrative hurdle to be jumped on the way to a project approval. Rather an EIR should be a vital part of the decision making process, supplying decision makers with the information needed to make an informed choice. Once again, thank you for this opportunity to comment.

Yours truly,



Sandra L. Genis

enc.

S. Genis
18 of 18



Smithsonian
National Museum of Natural History

Department of Anthropology
NHB 112

October 14, 1999

Ms. Juana R. Mueller, Vice-President
and
Mr. Donald E. Mueller, Chair, Governmental Affairs
Boisa Chica Land Trust
207 21st Street
Huntington Beach, CA 92648

Dear Ms. and Mr. Mueller:

I would like to thank you and Dr. Stanford, of our staff, for bringing to my attention the circumstances surrounding the archaeological site in Huntington Beach known as ORA 83. It is my understanding that the remaining portions of this site are slated to be destroyed as the result of an impending housing development project. I am not sure how much of the site remains, but over the last few weeks I have reviewed several key archaeological issues concerning this site. As a result I am now convinced that every effort should be made to preserve as much of the site as possible. I come to this conclusion because of the site's unique characteristics and the clear importance it had in the ancient history of California. ORA 83 is almost certainly the last remaining major coastal habitation site between Los Angeles and San Diego. It was probably such an important place in prehistory because of its location at the coastal end of a natural transportation corridor that stretched out into the Mohave Desert. As such, the people who lived at ORA 83 most likely also traversed a very large inland region. From a broader perspective there is much interest in understanding how people in the past made use of coastal resources to develop complex societies. ORA 83 is the kind of site that could significantly broaden our understanding of human cultural history with implications that extend far beyond California.

Considering the importance of this site I respectfully urge your local officials to carefully consider what its loss will mean to California and the Nation. I am familiar with the recent and regrettable loss of site ORA 64. The tragedy would only be compounded if we did not do everything in our power to preserve ORA 83. I sincerely hope there is room for remembering the past in our vision of the future.

Best regards,

A handwritten signature in black ink, appearing to read "Daniel Rogers".

J. Daniel Rogers, Ph.D.
Head, Division of Archaeology
Phone: 202-786-2511
FAX: 202-357-2208
cc: Dr. Dennis Stanford

RESPONSES TO SANDRA GENIS
Bolsa Chica Land Trust
Letter Dated January 20, 2000

13-1 In general terms the scope of environmental analysis is limited by the jurisdictional authority of the CPUC. There is no reason for the Draft SEIR to examine any issues associated with future development on Bolsa Chica Mesa other than those pertaining to the pending applications before the CPUC. The CPUC utilized input received during the Notice of Preparation period to determine the appropriate scope of issues to be analyzed in the SEIR, but limited the issues to those relevant to the Proposed Project, which consists of the construction of a water transmission line and the designation of SCWC as the wastewater management agency for the proposed Bolsa Chica Planned Community project. It is not appropriate for the SEIR to re-evaluate impacts associated with project components evaluated in the previously certified EIR. The need for any supplemental environmental review related to possible changes in the disposition of development on Bolsa Chica Mesa must be determined by the Lead Agency with land use authority on such matters (i.e., either Orange County or the California Coastal Commission). The CPUC has no authority on these matters and does not have the ability to assume Lead Agency status for matters that are the primary responsibility of other agencies.

With respect to the specific issues raised in the comment, the following responses are made:

- The archaeological survey and analysis considered the significance of existing archaeological resources in evaluating the impacts of the Proposed Project. In addition, CA-ORA 83 (the site that is the subject of the attached correspondence from the Smithsonian National Museum of Natural History) is specifically considered in the Draft SEIR.
- The Sandover development is an approved project already under construction (the City of Huntington Beach is the Lead Agency for the project). Information about human remains discovered at this site was considered in the cultural resources analysis of the Draft SEIR. The discovery of these remains reinforced the known archaeological sensitivity of the area, which is acknowledged in the Draft SEIR.
- The proposed outfall pipes are not germane to an environmental analysis of the applications filed with the CPUC. These matters should be considered by those agencies with regulatory authority over such matters.
- The impacts of urban runoff were considered in the Draft SEIR to the extent they are relevant to the Proposed Project. Actions affecting the wetland restoration area that are not part of the Proposed Project are not an appropriate subject for the SEIR.
- The potential for a degradation of surface water quality in Huntington Beach was considered to the degree relevant to the Proposed Project.
- It is not clear what relevance this subject has to the Proposed Project.
- The environmental analysis contained in the Draft SEIR refers to current rather than 'pending' studies and requirements. Once again, the relevance of this subject to the Proposed Project is unclear.
- A comprehensive analysis of the potential traffic and circulation impacts is provided. The analysis is based on background levels at the time the Draft SEIR was prepared.
- A cumulative project list is provided in Section F.3 of the Draft SEIR.
- An air quality assessment of adequate scope for the Proposed Project is provided in Section C.1 of the Draft SEIR (please see response to Comment 13-48).

- A soils and geology analysis of adequate scope for the Proposed Project is provided in Section C.5 of the Draft SEIR, including current information on earthquake faults.

13-2 Mitigation measures requiring the preparation of subsequent plans and studies are permissible, provided the mitigation measures clearly indicate the purpose of such subsequent plans and studies, identify the entity responsible for preparing and reviewing such subsequent work, and provide a method for determining what, if any, additional actions must result from these subsequent plans and studies. Because environmental analysis is encouraged to take place early in the planning and design of Proposed Projects, there is often a practical need to undertake more detailed work at a later stage in the process. A good example is the preparation of traffic control plans described in Mitigation Measures T-1. It would be premature, impractical, and inefficient to require the applicant to prepare such a detailed, construction-level plan for the EIR, just as an agency doesn't require a developer to submit detailed construction drawings for houses in a proposed subdivision when they are seeking their initial land use entitlements and undergoing CEQA review. In other instances, identification of specific mitigation actions must be deferred until a specific impact arises and can be evaluated. Standard archaeological mitigation is an example of this, where specific mitigation actions cannot be specified until a cultural resource is discovered during construction. In such a case, the mitigation measures in the SEIR describe a process for ensuring adequate mitigating actions if and when specific impacts arise.

There are often numerous subsequent permits and approvals that are required before a project is constructed. Various agencies have regulatory authority over various resources or over various components of a project that require subsequent review and approval. Most often, these are ministerial actions where little or no discretionary approval is involved (please note that such agencies are not considered "responsible agencies" under CEQA). The SEIR cannot ignore these existing requirements; in fact, the SEIR must consider existing regulatory requirements in determining the potential significance of project impacts. It would not be appropriate for the SEIR to ignore existing regulations and permit requirements that would serve to reduce or avoid potential impacts. The SEIR must assume that existing regulations will be followed and that all required permits will be obtained, and then judge the potential significance of project impacts with these assumptions in mind. For information on how the public can be informed about permit reviews conducted by other agencies, we recommend that you contact the permitting agencies.

13-3 CEQA does not require the use of significance criteria for the preparation of EIRs. When they are used, the Lead Agency has discretion in determining appropriate significance criteria for a given project. In many cases, legislative or other regulatory standards are not available to serve as significance criteria for various types of impacts and the determination of impact significance must be based on professional judgment. The EIR preparers believe it is good practice to formulate significance criteria that are suited to a particular project, rather than relying on some arbitrary set of "standard" criteria applicable to any type of project. Such a practice results in a better analysis of impacts by focusing on potential types of impacts that are relevant to a specific type of project.

13-4 In the application materials filed with the CPUC, the applicant indicated various practices or project design features that are considered part of the project. The CPUC considers these to be inherent components of the project description or as specific commitments made by the applicant. Therefore, the CPUC will need to ensure that the project is built as described and that the applicant's commitments are adhered to. These commitments become part of the

project approved by the CPUC (assuming an approval is granted). This is common practice in EIR preparation and is considered the fairest way to evaluate a Proposed Project's impacts. The preparers believe that it is inappropriate to convert inherent features of the project into mitigation measures for the EIR. Mitigation needs to consist of measures and actions needed to reduce impacts that are not already a part of the project and that go above and beyond existing regulations and permit requirements. Once again, this is common practice in EIR preparation and considered the best approach for evaluating a project's potential impacts. For the convenience of the reader, more detailed descriptions of the applicant's commitments that would serve to reduce or avoid potential impacts have been added to the Final SEIR.

- 13-5 The public participation process conducted by the CPUC is described in Section A.7 of the SEIR. It includes a description of all public involvement techniques implemented during the preparation of the SEIR. In accordance with its usual practice, the NOP and Scoping Notice were appended to the Draft SEIR and are included in the Final SEIR.

Although not required, the CPUC has elected to append additional documentation regarding public involvement to the Final SEIR per your request (see Appendices 2 and 3). The comments made by members of the public during the scoping meetings, a transcript of the CPUC's Public Participation Hearing, and the Notice of Completion (NOC) have been added to Appendix 3. The mailing list of agencies, organizations, and citizens notified are part of the public record for the project. They have not been included in the Final SEIR because they were too voluminous. However, these are public documents and they can be obtained from the CPUC.

- 13-6 The CPUC would approve a general alignment for the pipeline with a more detailed alignment to be submitted when construction plans are prepared for the approved alignment.

- 13-7 Background information on SCWC is provided in Section B.4 of the Draft SEIR. Additional information pertaining to SCWC's water rights and usage is not germane to the evaluation of environmental impacts for the Proposed Project. However, please note that testimony concerning SCWC's water supply and ability to provide service has been filed in the CPUC's Proceeding.

- 13-8 The capacity of the transmission line is 2,500 gpm (or 1,650 gpm with 50 psi residual).

- 13-9 The preparers of the Draft SEIR do not regard this information as relevant to the assessment of environmental impacts of the proposed action. However, the information requested was sought from SCWC. SCWC reports that the Orangewood Avenue main is part of an integrated system operating in the area that services the Los Alamitos Customer Service Area.

- 13-10 Approximately 10 feet.

- 13-11 The pipeline alignment varies in order to protect existing utilities under Bolsa Chica Street or to attain an appropriate alignment for channel crossings. In general, only one northbound lane will be closed during construction although, as the commenter observes, two lanes will be closed from time to time during construction in these segments.

- 13-12 Coatings for aboveground sections of pipe will be cement mortar for ductile iron pipe and paint/primer for steel pipe.

- 13-13 The pipeline segment along Los Patos Avenue will remain in private property.
- 13-14 The water treatment facility is not actually a component of the project being analyzed. All of the on-site water facilities (including the reservoir, well, pumps, and distribution system) were part of the project examined in the *1996 Recirculated Draft EIR for the Bolsa Chica Local Coastal Program*. Basic information on these on-site water facilities was presented in the SEIR to help the reader understand the water system that the proposed water transmission line would supply.
- 13-15 The reservoir-filling rate is estimated in the *Plan of Works for Water and Wastewater* (IWA Engineers, 1998) to be 1,632 gpm. This will vary according to upstream variations in source pressure. The filling rate is expected to vary between 1,100 gpm to 2,500 gpm. The capacity of the transmission line is not 750 gpm but 2,500 gpm.
- 13-16 The on-site distribution pumps are not a component of the project being evaluated in the Draft SEIR. However, for your information, pumping will be continuous based on user demands.
- 13-17 Pumping from the on-site well will count against the SCWC's allocation of pumping rights.
- 13-18 Emergency interconnections with other systems are considered a common and mutually beneficial arrangement. Such interconnections are typically established by written agreements between the interconnecting water agencies.
- If an interconnection involves the rate for re-sale of water, a CPUC authorized tariff would be required for such an interconnection. If the interconnection is for emergency supply purpose between an investor-owned utility and a public utility, no CPUC review is required.
- 13-19 This information was not available at the time the Final SEIR was prepared. Please note that detailed plans for development on Bolsa Chica mesa have not been finalized. The CPUC is not involved in reviewing or approving land use plans or water distribution plans for Bolsa Chica Mesa.
- 13-20 The CPUC is not involved in permitting the proposed wastewater facilities to be constructed on Bolsa Chica Mesa. Orange County and the California Coastal Commission are the Lead Agencies for these facilities. Please note the CPUC is only involved in considering whether SCWC should be designated the wastewater management agency for the Bolsa Chica Planned Community project, not in approving the construction of any wastewater facilities. For information concerning alternate locations for the lift station, we recommend that you contact Orange County or the Coastal Commission.
- 13-21 This would not be the subject of CPUC review and approval (please see the response to the preceding comment).
- 13-22 The Peak Hour Wastewater flows will be 1,064 gpm (2.37 cfs). The Warner Avenue Sewage Lift Station has been sized to accommodate these flows (it has a maximum capacity of 2,400 gpm).
- 13-23 Please note that these facilities are not part of the Proposed Project. The CPUC has no additional information on these facilities. We recommend that you contact Orange County or the California Coastal Commission for further information.

- 13-24 The applicant has indicated that the hours of construction would be limited to between 7:00 a.m. and 6:00 p.m. (Proponents Environmental Assessment, SCWC, 1999b, p. 3-11). These are considered typical hours for construction; however, in some instances construction may occur for fewer hours on some days (see the response to Comment 13-43). Construction hours may be further limited in the traffic control plans to be approved by affected cities (see Mitigation Measure T-1).
- 13-25 Yes. Construction hours include delivery of construction of equipment and material. A CPUC-designated construction monitor would monitor construction hours in the field.
- 13-26 According to the engineering firm (Tetra Tech, Inc.) responsible for designing the pipeline and planning construction, local staging areas along the right-of-way would not be needed for pipeline construction. Material and equipment needed for each day's construction would be brought to the construction site at the beginning of each day and removed at the end of each day.
- A location away from the construction alignment may be used to store some equipment and material overnight. However, this location has not yet been identified.
- 13-27 Necessary equipment and materials would be delivered to the construction site each day. Equipment would be removed from the construction site at the end of each day. Impacts of daily transport were considered in the Draft SEIR, specifically in the traffic and air quality analyses.
- 13-28 No staging area is proposed along the construction alignment.
- 13-29 Water would most likely be obtained from local fire hydrants. This is not anticipated to result in any significant impacts to the surrounding area. Because most construction would take place within paved streets, water requirements are expected to be relatively modest.
- 13-30 Approximately 150 truck loads of debris will be removed from the site during the construction process, i.e. less than one round-trip per day.
- 13-31 Given the extremely low volume of traffic generated by construction vehicles relative to the volume of traffic carried by Bolsa Chica Street/Road, no haul routes needed to be identified.
- 13-32 Contractors may use a range of substitute equipment for laying the pipe in the trench. It is estimated that emissions of substitute equipment will not vary more than 1-2%. Therefore, the impacts would remain the same as identified in the SEIR.
- 13-33 Water used for pressure testing, pipe flushing, and disinfection will be discharged to a storm or sanitary sewer, as noted on page B-32, Section B.7.1. An estimate of the total volume of flushing water that would be necessary for testing and flushing of the pipeline is 1.87 million gallons. The precise point of discharge will be a condition of the NPDES permit.
- 13-34 Chlorine will be present below detection limits. Other chemicals will be in concentrations typical of drinking water. Therefore, no significant impacts are anticipated.
- 13-35 The construction of the reservoir is not part of the project being evaluated by the SEIR. The reservoir and backbone distribution facilities are part of the development project under

- consideration by Orange County and the California Coastal Commission. The CPUC does not have any information on these other than what is provided in the SEIR.
- 13-36 Please see response to Comment 13-35 above.
- 13-37 Please see response to Comment 13-35 above.
- 13-38 Please see response to Comment 13-35 above.
- 13-39 Contact information for Southern California Water Company is public information. In addition, please note that Mitigation Measure T-1 includes contact information as part of notification.
- 13-40 The Applicant is required to request an easement from the Navy prior to jacking the pipeline under the railway. The Applicant has corresponded with the company responsible for the management and maintenance of the railway line -- the Union Pacific Railroad Company (Union Pacific). Union Pacific specified that jacking should occur at a depth of 2.5 feet and that a 28-inch steel casing pipe with a 0.5-inch thickness would be required beneath the railway line.
- 13-41 The Wind Rose represents data from the closest South Coast Air Quality Management District (SCAQMD) monitoring station to the project site. This Wind Rose represents the typical wind speeds and directions in the general area, and is suitable to characterize the meteorology for the project. This is the most appropriate data set to characterize the baseline conditions.
- 13-42 Please see the response to Comment 7-10.
- 13-43 To clarify, 7:00 a.m. to 6:00 p.m. is not a 13-hour period; it is an 11-hour period. With regard to the construction period, this information was taken from the Proponent's Environmental Assessment (PEA) (SCWC, 1999b, p. 3-11). It represents a period of time that construction is assumed to occur. The construction operating hours per equipment were taken from Table B.7-2. The operating hours are typically 8 to 10 hours per day per equipment. The 50 percent factor represents a load factor plus a percent of how long each piece of equipment would be used per 8-hour construction period. These assumptions are typical for the construction of a pipeline in an urban setting.
- 13-44 The assumption listed in Table 3 of Appendix 4 lists a total of five roundtrips, each trip having a distance of 45 miles. Five trips per day are more than adequate to transport all equipment and supplies needed on a daily basis. It should be noted that the construction engineers assume that the construction progress rate is only 100 feet per day for each of the three pipeline spreads.
- 13-45 Sensitive receptors are identified in Section C.2 and in Figure C.2-3. The text of the SEIR has been changed to reference these sensitive receptors.
- 13-46 Particulate emissions were evaluated from both exhaust and fugitive emission sources. Tables C.1-9 and C.1-10 provide a summary of the total particulate emission levels. In addition, Appendix 4 provides details on how the emissions were calculated. With regard to mitigation, the Applicant has identified four measures (SC 4.3-1 through SC4.3-4) that will be used to

- control particulate emissions from the project site. Table C.1-8 describes each of the four measures.
- 13-47 The Applicant's Proposed Measures together with proposed Mitigation Measures A-1 through A-9 would help to reduce potential air quality impacts to both residential and nonresidential sensitive receptors. However, NOx emissions from construction would still cause a short-term air quality impact (Class I).
- 13-48 With regard to PM_{2.5} (particulates less than 2.5 microns in diameter), the enforcement of the PM_{2.5} standard by the U.S. Environmental Protection Agency was found to be unconstitutional based on the May 14, 1999, opinion from the U.S. Court of Appeals for the District of Columbia Circuit. As a result, PM_{2.5} is not addressed in the SEIR for the Bolsa Chica Water Transmission Line and Wastewater Service Project. However, any measures that reduce the impacts associated with PM₁₀ will also reduce the impacts of PM_{2.5}. The Applicant's proposed measures (see Table C.1-8) are designed to have this effect.
- 13-49 The potential for hazardous air pollutants to be released into the environment due to construction and operation of the pipeline is extremely low and would not cause any significant impacts (please see Section C.1).
- 13-50 The text was modified to characterize the receptors as non-residential sensitive receptors.
- 13-51 The significance criteria used in Section C.2.2.1 are typically used in the CEQA process to identify potential impacts associated with a Proposed Project. Reducing the significance criteria from 12 hours to six hours would not change the results of the impact analysis.
- 13-52 The advance notice period for pile driving activities would be the same as the notice period for other construction activities. Mitigation Measure N-1 requires the contractor to provide seven days advance notice of the commencement of construction in the vicinity of businesses and residents. Refer to Mitigation Measure N-1 for a detailed description of the notification process. The Applicant proposes to use pile driving only at the Westminster Channel crossing.
- 13-53 The Applicant Proposed Measure in Table C.2-7 is appropriate to reduce noise impacts to the surrounding public. See Table C.2-6 for a list of construction period limits per City.
- 13-54 Typically, transport of equipment and material would occur in the 7:00 a.m. to 6:00 p.m. construction window.
- 13-55 The equipment noise level listed in Table C.2-8 reflects noise levels from equipment in good condition, with well-fitted mufflers, air intake silencers, and operating at near-peak levels. The noise level reduction from the installation of a new muffler would be dependent on the type of equipment, the equipment condition, and the size of engine.
- 13-56 Noise levels could be expected to be 80 to 90 dBA at a distance of 10 to 15 feet. Recorded noise levels along the rights-of-way are in the range of 54.3 to 75.7 dBA, with a maximum recorded noise level of 93.9 dBA. In many cases, the noise levels from construction along Bolsa Chica Road would only be slightly higher than existing ambient noise conditions. The Applicant Proposed Measures (listed in Table C.2-7) and Mitigation Measures N-1 through N-3 are adequate to reduce the small incremental increase in short-term noise impacts associated with construction of the water line.

- 13-57 Please see response to Comment 13-56 above.
- 13-58 The temporary noise levels associated with construction of the water line would approach Occupational Safety & Health Administration (OSHA) permissible noise exposure levels in 29 CFR Section 1910.95. It should be noted that these thresholds apply to occupational exposure, not the general public. In addition, it should be noted that existing noise levels along Bolsa Chica Road are slightly below the OSHA permissible noise exposure levels. Overall, it is viewed that the Applicant Proposed Measures (listed in Table C.2-7) and Mitigation Measures N-1 through N-3 would help to reduce the adversity of these noise levels to the surrounding public.
- 13-59 The Proposed Project alignment was thoroughly reviewed to try to reduce potential impacts to the surrounding environment and the public. A number of issues were looked at in evaluating the best alignment between the City of Cypress and Bolsa Chica Planned Community site. Not only did the preparers of the SEIR look at noise impacts, but they also evaluated how the Proposed Project would affect (or be affected by) the following issue areas: air quality, transportation and circulation, environmental contamination, geology and soils, hydrology and water quality, cultural resources, biological resources, land use and recreation, and public services and utilities. Overall, the route described in the SEIR was identified to be the best route for a water line between the City of Cypress and Bolsa Chica Planned Community site in terms of noise considerations. However, Alternative 1 (Connection to the City of Huntington Beach) was found to be the overall environmentally superior alternative in the Draft SEIR.
- 13-60 The text has been modified to incorporate the comment.
- Table C.2-6 identifies the agencies responsible for enforcing noise ordinances. However, given the level of interest in this matter, further information is provided below:
- City of Cypress: Police Department, ph: 714/229-6680.
 - City of Garden Grove: Code Enforcement, ph: 714/741-5375, ext. 5319.
 - City of Westminster: Department of Code Enforcement, ph: 714/898-3311.
 - City of Los Alamitos: Neighborhood Preservation Officer, ph: 562/431-3538.
 - City of Seal Beach: Code Enforcement, ph: 562/431-2527.
 - City of Huntington Beach: Planning Department (Code Enforcement), ph: 714/536-5511.
- 13-61 It should be noted that the existing ambient noise levels along the pipeline rights-of-way are relatively high. Recorded noise levels along the rights-of-way are in the range of 54.3 to 75.7 dBA, with a maximum recorded noise level of 93.9 dBA. It is estimated that construction noise levels would not be much higher than 70 dBA to 80 dBA at a distance of 50 feet. The Applicant Proposed Measures (listed in Table C.2-7) and Mitigation Measures N-1 through N-3 are adequate to reduce the small incremental increase in short-term noise impacts associated with construction of the water line.
- 13-62 Mitigation Measure N-2 would provide the public with additional information on the project, as well as how long the construction activities and noise levels would be expected. In addition, the community liaison would report any severe noise levels to the contractor and the CPUC, so that additional measures/procedures could be developed to reduce the short-term noise impacts.

- 13-63 As described in the previous responses, the project area currently has relatively high ambient noise levels from the traffic along Bolsa Chica Road. The temporary noise levels from construction would only be slightly higher than existing ambient noise conditions. The mitigation measures listed in the EIR are adequate to reduce the small incremental increase in short-term noise impacts associated with construction of the water line.
- 13-64 The operation of the water and sewage lift pumps are not part of the Proposed Project. The potential noise impacts associated with the pumps were addressed previously in the *1996 Recirculated Draft Environmental Impact Report for Bolsa Chica Local Coastal Program*. Please see response to Comment 13-20.
- 13-65 There will be other noise frequencies from construction that could cause annoyances or discomfort to the local community. The mitigation measures listed in the SEIR are adequate to reduce the annoyances from the construction of the water line to a less-than-significant level.
- 13-66 The noise levels associated with haul trucks would be minimal. In addition, it is anticipated that there would be less than five haul trips per day assuming the construction progress rate of 100 feet per day.
- 13-67 An adverse change in roadway system levels was assumed to occur when service levels were expected to drop from A, B, or C to D or worse, or from D to E, or E to F.
- 13-68 The preparers of the SEIR agree with the definition of acceptable roadway system service levels reflected in the local circulation elements, Congestion Management Plans (Prop. 111), Growth Management Plans (Measure M) and believe that our use of Level of Service in the SEIR is consistent with this definition.
- 13-69 Mitigation Measure T-1 requires that traffic control/management plans be prepared for and reviewed by all of the affected public agencies.
- 13-70 Traffic control/management plans prepared by the contractor will be reviewed and approved by the affected public agencies. The CPUC is responsible for ensuring that the mitigation measure is implemented, if adopted by the Commission.
- 13-71 Please refer to response to Comment 13-69.
- 13-72 Typical standards and techniques used in the preparation of traffic control/management plans are numerous and are contained in: (1) Caltrans Traffic Manual Chapter 5, (2) Manual of Traffic Controls for Construction and Maintenance Work Zones, (3) Work Area Traffic Control Handbook, and/or (4) Standard Specifications for Public Works Construction for each affected jurisdiction. In general, these references discuss acceptable methods for the placement of signs, flashers, barriers, use of flaggers, and so forth.
- 13-73 Equipment and material will generally be put into place and removed from each construction site once a day. The exact hours will be approved by each affected public agency as part of the traffic control plan. The impacts to peak traffic flows are anticipated to be insignificant due to the small number of vehicles involved.
- 13-74 The project will be constructed in public streets and rights-of-way. An equipment list is provided in the Draft SEIR (see Table B.7-2).

- 13-75 The number of haul trips would generally be limited to less than five per day. The designation of haul routes is not necessary because of the small number of vehicles involved.
- 13-76 Traffic control/management plans would be reviewed, approved, and enforced by the affected local jurisdiction. The CPUC will monitor the implementation of the mitigation measure.
- 13-77 Please refer to response to Comments 13-70 and 13-76.
- 13-78 The CPUC does not agree with this assertion. The disruption to both residential and commercial premises will be temporally and spatially limited. The Draft Supplemental EIR includes a series of measures to mitigate disruption in addition to notification.
- 13-79 Locations where bus stops will be blocked can be determined by the contractor once traffic control/management plans are approved. Mitigation Measure T-5 requires that the contractor coordinate the location of any needed temporary bus stop locations with OCTA.
- 13-80 The likelihood that cyclists would use alternative routes is based on two key factors: (1) the origin and destination of the trip, and (2) the convenience of the alternative route relative to the trip origin and destinations. It is anticipated that some cyclists would chose to either not use the alternative route or not make the trip on a bicycle.
- 13-81 Bike lanes currently exist on only a short segment of Bolsa Chica Street between Bolsa Avenue and Edinger Avenue (a distance of approximately 5,400 feet). It is within this segment where the bike lane may need to be closed temporarily. Under these circumstances, bikes may need to share the travel way with vehicles as they now do on most other sections of Bolsa Chica Street/Road.
- 13-82 A contractor is required to follow construction methods that meet the standards for each affected local public agency. The final stage of the pipeline construction project will need to include paving techniques that are approved by the affected agency.
- 13-83 Depending on where the individual construction zones are located at any given time, there may or may not be significant numbers of motorist that would be impacted by all three locations. Alternative corridors such as Springdale Street provide a good alternative routing for longer trips that could be impacted by more than one construction zone on the Bolsa Chica Corridor. We agree that there are advantages and disadvantages regarding the use of several simultaneous construction zones.
- 13-84 Pei-Fen Tamashiro, Installation Restoration Coordinator, Seal Beach Naval Weapons Center was contacted about potential contamination near the project alignment. In addition, database search results, local knowledge, and proximity of facilities at the Seal Beach Naval Weapons Center and Los Alamitos Armed Forces Reserve Center relative to the project alignments provided adequate information to screen these facilities for hazardous waste. Localized low-level soil contamination along the perimeter access road for the Naval Weapons Station is separated from the project alignments by the Bolsa Chica Channel, and therefore poses a low potential to impact the project.

Based on: (1) database search results, (2) the proximity of facilities at the Boeing Campus relative to the proposed alignment, and (3) the distance and facilities between the alignment and the Boeing facility, it is anticipated that the potential for impact is low.

- 13-85 Construction practices for trenching and pipeline construction should not pose significant potential for release of contaminants. Construction must comply with standard practices for material storage, handling, and safeguards from spills and leaks. Similarly, routine operation and maintenance of a buried water pipeline should have little to no potential to cause a release of hazardous materials.
- 13-86 The additional file review, necessary site investigations, and preparation of contingency plans must be carried out prior to construction. This work is intended to provide designers and construction crews with prior knowledge of site conditions in order to develop procedures to address existing contamination in the proposed trench. Please also see the response to Comment 13-2.
- 13-87 Health and Safety Plans and construction contingency plans will be reviewed by the Department of Toxic Substances Control (DTSC) or County Health Department, which will then make these plans public as appropriate.
- 13-88 Personnel trained for visual monitoring and field-testing shall be on site during all active trenching. These personnel are not required for pipe laying and backfill operations.
- 13-89 It is not standard practice to open a very long trench in one stage, especially in city streets. Trenching, laying of pipe, and backfill operations are commonly completed in stages, therefore the contractor should have no problem providing and utilizing testing equipment during all phases of trenching.
- 13-90 Contaminated soil should be placed directly into transfer trucks or roll-off bins. The construction contingency plan should identify potential waste haulers, and disposal and recycling facilities. This has been conveyed to the Applicant.
- 13-91 Chlorination of the pipeline after construction and during routine operation should not exceed reasonable exposure levels. (Please also see response to Comment 13-34.)
- 13-92 Fault investigations should include literature review and determination of need for field studies and trenching, to locate fault traces. Determination of fault location will allow designers to develop plans for placing shut off valves.
- 13-93 Automatic and manual shut off valves, installed every 1,000 feet along the pipeline, will limit the amount of water lost in the event of rupture. In addition, flexible couplings at joints between ductile iron and steel segments, seismic design at locations where the pipeline would cross storm drain channels aboveground, and push-on joints which allow minimal deflections without leak or rupture will be used.
- 13-94 Dewatering of the trench during construction could cause the trench walls to settle or collapse. Shoring or other mechanical stabilization of the trench walls may be required. Anticipated dewatering will likely be limited to nuisance water or seepage within the trench and impacts to the surrounding soil should not extend beyond the construction area.
- 13-95 The rainfall data was included as a representation of the type of data available and not intended to be representative of any prevailing condition. The important issue is the storm information of the 25- and 100-year events and its relation to the drainage channels.

- 13-96 The project will have no effect on the capacity of the channels and therefore this issue was not reviewed.
- 13-97 Groundwater quality data is collected by Orange County Water District and is presented in the Geoscience Support Services reference (1994). Please note that the groundwater well, which will utilize water from the main aquifer, is not a part of this Project (see response to Comment 13-17).
- 13-98 It is our understanding that Best Available Technology is typically used for treatment systems, as for water and wastewater treatment, and that Best Management Practices (BMPs) would be used for managing an operation such as construction. The likely BMPs to be implemented in this project are described in the response to Comment 7-22.
- 13-99 This criterion was not included because the impacts were considered unlikely to be significant. However, the preparers of the Draft SEIR have no objection to the inclusion of this criterion and have included it. The inclusion of this criterion has not altered the impact analysis as presented.
- 13-100 This criterion was included, but was stated as: "...discharge of sediment into any storm channel." Although storm channel is inherently inclusive of storm drain and surface water body (storm drain feeds water to the channel, the channel feeds water to the ocean, and there are no other applicable lakes or streams in the project area), the wording has been modified as noted. The modification of this criterion has not altered the impact analysis as presented.
- 13-101 This criterion was not included because the impacts were considered unlikely to be significant. However, the preparers of the SEIR have no objection to the inclusion of this criterion and have added it. The inclusion of this criterion has not altered the impact analysis as presented.
- 13-102 This criterion was not included because the impacts were considered unlikely to be significant. However, the preparers of the SEIR have no objection to the inclusion of this criterion and have added it. The inclusion of this criterion has not altered the impact analysis as presented.
- 13-103 This criterion was not included because the impacts were considered unlikely to be significant. However, the preparers of the SEIR have no objection to the inclusion of this criterion and have added it. The inclusion of this criterion has not altered the impact analysis as presented.
- 13-104 This is difficult to predict. Due to the shallow depth of trenching (seven feet), water flows entering the trench are unlikely to be greater than nuisance seepage. Considering low flow rates and total volumes, it is likely that initial seepage rates will decline in periods ranging from a few hours to few days.
- 13-105 As stated, chemicals will be lower than detection limits. Please see response to Comment 13-34.
- 13-106 Please see the response to Comment 13-95.
- 13-107 The section entitled, "Applicant's Environmental Commitments" on page C.6-14 was provided for information and reference only, and does not take the place of the impact analysis.

- 13-108 Local staging areas along the right-of-way will not be needed for pipeline construction. Material and equipment needed for each day's construction would be brought to the construction site at the beginning of each day and removed at the end of the day.
- 13-109 The site of the soil stockpile and the sediment containment methods are administered by the construction contractor and overseen by the Regional Water Quality Control Board.
- 13-110 The EIR preparers do not understand the conflict. The applicant has committed to the implementation of Best Management Practices (this is also a regulatory requirement); however, the specific BMPs were not identified in the Draft SEIR. Additional information on BMPs has been added to Section C.6 of the Final SEIR.
- 13-111 BMPs will be identified in the NPDES permit which will be overseen by the RWQCB. These BMPs will be described in the Stormwater Pollution Prevention Plan required for project construction. Additional information on BMPs has been added to Section C.6 of the Final SEIR.
- 13-112 Accumulated dust, dirt, and mud would be cleaned from streets and equipment.
- 13-113 Please see response to Comment 13-33.
- 13-114 Please see response to Comment 13-34.
- 13-115 An estimate of the total volume of flushing water that would be necessary for testing and flushing of the pipeline is 1.87 million gallons. This figure is an estimate based on a total pipeline length of 35,370 feet. The effects on receiving waters are unlikely to be significant because the chemicals present would be below detection limits. A more precise answer cannot be given because the composition and management of the effluent depends, in part, on the conditions of the NPDES permit.
- 13-116 Based on the Bolsa Chica Plan of Works, Section 3.7, if on-site wells are viable, they would be expected to contribute 2,000 gpm and 750 acre-feet per year. This information is on page B-20 of the SEIR. According to the Plan of Works (Section 3.7.2.1), the Maximum Perennial Yield for the Bolsa Chica groundwater basin is approximately 17,000 acre-feet per year. Current well production was stated to be 4,000 to 10,000 acre-feet, or 60% of the maximum yield. Please note that the proposed groundwater well is not a part of the Proposed Project and the CPUC is not involved in issuing any approvals for this well. Please contact the California Coastal Commission and Orange County for further information.
- 13-117 As stated above, the proposed groundwater well is not a part of the Proposed Project and the CPUC is not involved in issuing any approvals for this well. The only information available to the CPUC on this issue comes from the applicant's Plan of Works (Section 3.7.2.1), which draws on the Geoscience Support Services report (1994). This work assessed that: "based on the historical evaluation of sea-water intrusion within the known aquifers and the local fault characteristics, the selected well sites have relatively low potential for sea-water intrusion." Please also see response to Comment 13-97.
- 13-118 This issue is outside the scope of the SEIR. The issue pertains to the construction of the proposed development of the Mesa. Accordingly, please contact the California Coastal Commission or Orange County for information.

- 13-119 These measures have been removed from the SEIR because they do not specifically address issues in the analysis of hydrology and water quality.
- 13-120 At this time, the extent of impacts on cultural resources is unknown. The area of Bolsa Chica Mesa currently identified as the reservoir and pump station site yielded little to no surface evidence of prehistoric resources, but every area surrounding this particular property has resulted in the identification of buried deposits. Based on known data for the surrounding properties, it is presumed that the reservoir and pump station sites will yield evidence of prehistoric remains. For these reasons, Mitigation Measure CR-4 is recommended.
- 13-121 Because of the area's sensitivity, any pipeline route to the Mesa, as well as other reservoir locations, would also have the potential for impacting cultural resources.
- 13-122 Once the pipeline and reservoir are constructed, the cultural resources would have been removed and the property considered cleared. Therefore, there should be no additional impacts.
- 13-123 The preparers of the SEIR agree that an adverse effect on a wetland could be significant. The significance criteria in the Final SEIR have been modified. The inclusion of this criterion has not altered the impact analysis as presented.
- 13-124 The preparers of the SEIR understand that the "vernal pool" recently identified at the proposed site of the reservoir is more properly characterized as a seasonal wetland. It is the CPUC's understanding that a delineation study for this seasonal wetland has been submitted to the California Coastal Commission and is currently under evaluation. Preliminary review indicates that the proposed pipeline would have no direct affect on the wetland; however, construction of the proposed reservoir would presumably displace the wetland. It is the CPUC's understanding that the Coastal Commission will determine if the wetland deserves protection and, if so, what measures need to be taken to preserve the resource. Conceivably, the reservoir location may need to be changed (see the following response). We do not know definitively if the southern tarplant exists at the reservoir site (see Section C.8.1.1 of the SEIR for results of previous surveys).
- 13-125 If the California Coastal Commission determines that the recently identified seasonal wetland deserves protection, the applicant might decide to change the proposed location of the reservoir (this is still speculative at this juncture). The disposition of the reservoir site is a decision for the Coastal Commission that must be made in the context of larger land use and environmental issues associated with the proposed residential development on Bolsa Chica Mesa. Since the Coastal Commission is the lead agency for this issue (together with Orange County), the CPUC will abide by whatever action the Coastal Commission may take regarding the location of the reservoir.
- 13-126 The proposed wastewater collection facilities are part of the project examined in the *1996 Recirculated Draft EIR for the Bolsa Chica Local Coastal Program*. They are not part of the Proposed Project evaluated in the SEIR. Therefore, the SEIR did not evaluate any potential impacts associated with the locations of these facilities. Please keep in mind that the CPUC is not involved in approving the locations of the proposed wastewater collection facilities. Concerns about the locations of these facilities should be directed to the Coastal Commission or to Orange County.

- 13-127 Please see response to Comment 13-126 above.
- 13-128 Please see response to Comment 13-126 above.
- 13-129 This portion of the channel, from the Naval Base Golf course on the Los Alamitos Armed Forces Reserve Center south to Old Bolsa Chica Road, has concrete bottom and sides, and as a consequence no vegetation has become established in this area. The only types of vegetation that occur in the vicinity of this portion of the Bolsa Chica Channel are ornamental species, found in the yards of nearby residences and on the golf course. The only open areas adjoining this segment of the channel are the fairways and greens of the Naval Base Golf Course. Given the lack of vegetation along the channel sides and in the channel itself, and relatively small amount of water within the channel, this area serves as poor habitat for wildlife and thus disturbance to wildlife activities is not expected. A survey of these areas was conducted by the preparers of the SEIR for the purposes of the study.
- 13-130 The commitment to replanting of the southern tarplant (*Hemizonia parryi* ssp. *australis*) is a Project Design Feature (PDF-6) of the proposed Wetlands Restoration Plan; however, specific locations for the replanting of the tarplant are not given in the *1996 Recirculated Draft EIR for the Bolsa Chica Local Coastal Program*. Please keep in mind that impacts and mitigation measures for biological resources on Bolsa Chica Mesa that are described in the previous EIR remain in effect, and are applicable to those portions of the proposed pipeline that traverse Bolsa Chica Mesa. For details on how such mitigation measures will be implemented, please contact the agencies responsible for monitoring the implementation of these measures (i.e., the County of Orange).
- 13-131 Please see the response to the preceding comment. No information regarding whether previous replanting efforts of southern tarplant have been attempted could be identified. Because this species has proven adaptable to some levels of disturbance and has successfully competed with non-native grasses (such as found on the Bolsa Chica Mesa), it may prove to be a species easily reestablished on the grasslands of the mitigation site. For more information, we recommend that the commenter contact the agencies responsible for monitoring the implementation of mitigation measures described in the *1996 Recirculated Draft EIR for the Bolsa Chica Local Coastal Program* (i.e., Orange County).
- 13-132 Thank you. The text of the document has been modified to correct this mistake. Federal agencies do have jurisdiction in relation to federal properties. Relevant federal agencies were contacted through the issuance of the NOP; however, none chose to participate in this CEQA review.
- 13-133 The criterion is already provided. See Section C.9.2.1.
- 13-134 The text of the Final SEIR (see C.9.2.3) has been modified to reflect the impacts associated with noise, dust and air emissions. This is not considered a significant impact, however, because of the temporary nature of the impacts and because physical use of the park will not be disrupted. Construction, as it progresses, will have limited impacts to users of the park for a short period only.
- 13-135 Access will be impeded, but not blocked.

- 13-136 The number of spaces that will be affected is unknown. It will depend on the progress of construction through the parking lot and the measures used by golf course management to provided temporary parking areas.
- 13-137 The text of the Draft SEIR recognizes that construction will impair the enjoyment of the golf course. The CPUC agrees that loud noise is not compatible with recreational uses such as golf. However, this impact is not considered significant because of its temporary nature and because physical use of the golf course will not be restricted in any way.
- 13-138 See response to Comment 13-137.
- 13-139 The Draft SEIR provides mitigation measures considered appropriate for the temporary impacts that will occur to use of recreational facilities. As the analysis shows, the impacts to, for instance, use of the golf course will be temporary and limited. While inconvenient, these impacts are not significant because (i) they will be temporary, and (ii) access and use will continue throughout construction. Since the Applicant is required to seek permission before commencing construction on the premises of the Los Alamitos Armed Forces Reserve Center, the management of this facility will be able to impose any conditions they deem appropriate.
- 13-140 Thank you, correction noted.
- 13-141 In the area investigated, there are seven stations that provide paramedic and medic services: Fire Stations 17, 5, 48, 64, 65, 66, and 2 (Table C.10-1).
- 13-142 Correction noted, thank you.
- 13-143,
13-144 and
13-145 The CPUC believes that it has presented adequate significance criteria for impacts to public utilities. Most utility service providers have backup plans for short-term interruptions of service. In addition, prior to construction of the Proposed Project, the utility service providers will be notified to minimize the potential of accidents that could cause temporary service disruptions. Also, contractors will be required to prepare construction plans designed to protect utilities and to provide those plans to affected jurisdictions for review, revision, and final approval. During operation of the project, temporary service disruptions would be mostly limited to damage caused by natural disasters such as earthquake or flood, which are beyond the control of the applicant or the CPUC.
- 13-146 It is estimated that construction of the Proposed Project would generate approximately 120 tons per day of soil and broken asphalt for 65 days, totaling 7,800 tons during the life of the project. It is anticipated that operation of the Proposed Project would not generate any significant amounts of solid waste.
- 13-147 Solid wastes, including clean soil materials that may be recycled or relocated to sites that can use them, are not expected to adversely impact the capacity of any of the three major landfills currently serving Orange County. This is because the vast majority of excavated materials will be used as backfill.
- 13-148 It is not known how great of an increase in emergency response time could be anticipated for the worst-case scenario. However, Mitigation Measures T-1 (Section C.3) and PS-1 (Section

- C.10) are designed to help avoid adverse impacts related to emergency vehicle access that could impede their effectiveness during construction of the Proposed Project.
- 13-149 With implementation of Mitigation Measures T-1 (Section C.3) and PS-1 (Section C.10), it is not anticipated that paramedic response times would be affected to a greater degree.
- 13-150 Mitigation Measures T-1 (Section C.3) and PS-1 (Section C.10) are designed to help avoid adverse impacts related to emergency vehicle access during construction of the Proposed Project.
- 13-151 Mitigation Measures T-1 (Section C.3) and PS-1 (Section C.10) are designed to help avoid adverse impacts related to emergency vehicle access during construction of the Proposed Project.
- 13-152 Sections C.2 and D identify several sensitive receptors to noise along the proposed and alternative route segments, some of which could potentially be more severely affected by interruption of utility service compared to those of other land uses. However, prior to construction of the Proposed Project, the utility service providers will be notified to minimize the potential of accidents that could cause temporary service disruptions. Also, contractors will be required to prepare construction plans designed to protect utilities and to provide those plans to affected jurisdictions for review, revision, and final approval. During operation of the project, temporary service disruptions would be mostly limited to damage caused by natural disasters such as earthquake or flood, which are beyond the control of the applicant or the CPUC.
- 13-153 See response to Comment 13-152 above.
- 13-154 Applicant Proposed Measures 2 and 3, as described in Section C.10.2.2 of the SEIR, are designed to protect against service disruptions of utilities such as power lines (discussed above). A fund will not be established for replacement of equipment that are damaged by power surges.
- 13-155 Comment noted, thank you.
- 13-156 First, the project that is the subject of the *Supplemental* EIR does nothing to enhance or change the growth effects of the Bolsa Chica Planned Community. These effects were previously analyzed in the *1996 Recirculated Draft Environmental Impact Report for the Bolsa Chica Local Coastal Program* (County of Orange). Second, the current project is intended to wholly and solely serve the Bolsa Chica Planned Community. It cannot and would not serve any other areas of planned or proposed residential development. It would only serve the Bolsa Chica Planned Community that was previously subject to environmental analysis. Indeed, the City of Huntington Beach is at 90% buildout and the City of Seal Beach is at 98% buildout – the project would therefore not induce further growth.