



January 10, 2000

Brad Wetstone, CPUC
 c/o Aspen Environmental Group
 30423 Canwood Street, Suite 215
 Agoura Hills, CA 91301

SUBJECT: CITY OF SEAL BEACH COMMENTS RE: "DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT - BOLSA CHICA WATER TRANSMISSION LINE AND WASTEWATER SERVICE PROJECT, SOUTHERN CALIFORNIA WATER COMPANY (APPLICATION NOS. 98-11-003 AND 98-11-015)", STATE CLEARINGHOUSE NUMBER SCH: 99071049

Dear Mr. Wetstone:

The City of Seal Beach has reviewed the above referenced Draft Supplemental Environmental Impact Report ("DSEIR") and has several comments relative to the document. The proposed project is partially within the City of Seal Beach and has the potential to cause direct and/or indirect impacts upon our community. Provided below are comments, concerns and responses to several issues identified within the "DSEIR".

Project Coordination with Orange County Flood Control District:

As indicated in the DSEIR and our comments regarding the Notice of Preparation, Orange County Flood Control District is preparing to provide concrete lining of the Bolsa Chica Channel north of the SR-22 (Garden Grove Freeway). The City of Seal Beach requests both projects be coordinated to ensure the timely completion of both projects with minimum impacts to the environment. Project coordination would have the potential to reduce cumulative air quality, noise, traffic, and hydrology impacts. This issue is vitally important to the residents of Seal Beach, which adjoin the Bolsa Chica Channel, as they have experienced flooding during the winters of 1995, 1993 and 1992.

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Alternative 4 – North Seal Beach Wellfields:

The City of Seal Beach would oppose the implementation of this alternative. The City has previously gone on record as being opposed to the Bolsa Chica project, and is therefore not in a position to support the use of the North Seal Beach Wellfields as a viable alternative to the proposed project. The City understands the use of the wellfield is not directly controlled by the City, but would strongly urge the California Public Utilities Commission to remove this alternative from further consideration during the EIR approval and project approval process.

For the same reasons that the Westminster/Seal Beach Boulevard alternative was eliminated, the North Seal Beach Wellfield should be eliminated as well. The North Seal Beach Wellfield alternative will add one mile of additional street construction impacts over the proposed project. The proposed project alignment is within existing utility and non-roadway rights of way north of Lampson Avenue, whereas, the alternate alignment will effect one mile of Lampson Avenue and produce substantial traffic impacts.

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The proposed North Seal Wellfield falls within the jurisdiction of Seal Beach. The City of Seal Beach does not have any existing well facilities within the area shown on Figure D-2, page D-11. However, the City does intend to build a facility in the future near the location shown to improve reliability in our system that is north of the I-405 Freeway. The City's existing well facilities are located on Beverly Manor Road and on Old Bolsa Chica Road. Any future consideration of this alternative must include a detailed technical feasibility study that considers and complies with to the City's Water System Master Plan and the Orange County Water District 2020 Master Plan.

Additional Comments regarding DSEIR document:

The City of Seal Beach has the following additional comments regarding the DSEIR:

- EXECUTIVE SUMMARY, Section ES.4 – ISSUES TO BE RESOLVED, pages ES-5:

The third paragraph indicates the CPUC will be concerned with the cost of the proposed method of water and wastewater service provision to the ratepayer's in SCWC's West Orange County District. It would be helpful for an analysis of this issue to be available to the public for review and comment prior to the CPUC taking any action on the "Final Supplemental EIR" for this project. The public should be able to address not only the environmental, but also the economic impacts, of this project to the CPUC prior to any final actions being taken by the Commission.

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- EXECUTIVE SUMMARY, Section ES.5 – ALTERNATIVES TO THE PROJECT, North Seal Beach Wellfields, pages ES-7:

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To maintain internal consistency of the document, this heading should be identified as "Alternative 4", consistent with the alternative identification on page D-13.

- EXECUTIVE SUMMARY, Table ES-2 – SUMMARY OF IMPACTS AND MITIGATION MEASURES, pages ES-9 through ES-14:

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As a general comment, the Table is very helpful in quickly reviewing the impacts and proposed mitigation measures of the proposed project. The City of Seal Beach favors the mitigation measures as presented, with concern regarding those measures discussed below. The City appreciates the response to our comments on the "Notice of Preparation" regarding the provisions of mitigation measures T-1, T-7, B-1, and PS-1.

Regarding mitigation measure CR-4, on page ES-13, the City would request that avoidance of the site be seriously considered, as it would seem possible to re-route the proposed pipeline alignment to avoid significant impacts.

- Section A, INTRODUCTION, Subsection A.7.2, PUBLIC INVOLVEMENT OPPORTUNITIES, page A-11:

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The discussion under "NOP Responses" indicates that ". . . letters were received from agencies and organizations providing comments and suggestions regarding the scope of issues to be addressed in the SEIR." It would have been helpful to persons now reviewing the SEIR to be able to review a summary of those comments and suggestions to see how the SEIR responds to those comments and suggestions. A summary could easily be prepared as part of Appendix 2, and would have been most beneficial in reviewing the SEIR document. Please provide the requested summary in the Final SEIR as part of Appendix 2.

- Section B, DESCRIPTION OF THE PROPOSED PROJECT, Subsection B.6.1, DOMESTIC WATER TRANSMISSION LINE, Segment 5, page B-13:

7-7

The discussion under "Segment 5" indicates the pipeline crosses the I-405/SR 22 freeways and associated Caltrans right-of way. The City of Seal Beach would request the ability to further discuss with the project proponent the installation of additional sleeve piping to allow the City at a later date to utilize this sleeve piping for installation of additional water service lines to provide a loop system within the northern portion of the City.

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- Section B, **DESCRIPTION OF THE PROPOSED PROJECT**, Subsection B.6.1, **DOMESTIC WATER TRANSMISSION LINE**, page B-9:

The discussion under **"Projected Water Demand"**, second paragraph indicates *"The daily flow required by the local fire protection agency is 3,500 gpm."* In contrast, page B-18, the last sentence of the first paragraph states, *"The fire flow requirement is 3000 gpm/4 hours."* Please address the apparent inconsistency of the two statements or provide explanatory language regarding these figures.

7-8

- Section B, **DESCRIPTION OF THE PROPOSED PROJECT**, Subsection B.9, **INTENDED USES OF THE EIR AND ANTICIPATED PUBLIC AGENCY ACTIONS**, Table B.9-1, **Required Permits and Approvals**, page B-38:

The required permit from the City of Seal Beach is a "Public Works Permit". Please correct Table B.9-1 as requested. This "Public Works Permit" will not be issued until all appropriate provisions of the Code of the City of Seal Beach are met.

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- Section C, **ENVIRONMENTAL ANALYSIS**, Subsection C.1, **AIR QUALITY**, subsection C.1.2.3 **Construction Impacts**, page C.1-10 and 11:

The discussion does not include any consideration of construction-related air quality impacts to any identified CO "Hot Spots" along the proposed pipeline alignment. As indicated in our earlier comments on the "Notice of Preparation", given the existing levels of traffic congestion at the I-405/SR-22/Valley View/Bolsa Chica intersections, the EIR should evaluate impacts of project construction upon existing LOS levels and determine if the increased construction -related air emissions will either result in a CO "Hot Spot" at this intersection complex or significantly impact any existing CO "Hot Spots" at this intersection complex. In addition, the Air Quality analysis should determine impacts upon any other identified CO "Hot Spots" along the proposed pipeline alignment.

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- Section C, **ENVIRONMENTAL ANALYSIS**, Subsection C.1, **AIR QUALITY**, page C.1-13:

The discussion after Mitigation Measure A-9 indicates *"It should be noted that the maximum daily and quarterly emissions levels could be reduced by limiting the number of construction spreads to only two spreads operating concurrently, instead of the proposed three-spread schedule. This would essentially lengthen the construction schedule and reduce the quarterly and daily construction levels to below the SCAQMD emission thresholds."* Although the City generally favors

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actions that would reduce air quality impacts to levels below SCAQMD emission thresholds, the City would urge the project proponent to proceed with the three-spread construction schedule. The three-spread schedule will result in less cumulative short-term traffic impacts on the impacted street right-of-ways, thereby reducing traffic congestion. The reduced traffic congestion will result in significant air quality emission reductions over the entire construction period of the project.

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- Section C, **ENVIRONMENTAL ANALYSIS**, Subsection C.2, **NOISE**, page C.2-4 through C.2-6, Table C.2-2 **Measured Ambient Noise Levels along the Proposed Pipeline Route**, and Figure C.2-3, **Monitoring and Sensitive Receptor Locations Along the Proposed and Alternative Alignments** and Table C.2-3 **Sensitive Receptors Along the Proposed Pipeline Route**:

The referenced Table indicates 8 measurement locations, while Figure C.2-3 indicates a total of 17 noise monitoring locations, 9 of which are along the alternative routes. It would seem appropriate to provide the noise monitoring information for all 17 monitored locations within Table C.2-2 and to provide information regarding all 14 identified sensitive receptors within Table C.2-3. In addition, it would be extremely helpful to provide CNEL information for all Tables and Figures within this section of the document as well as in Section D, **ALTERNATIVES DESCRIPTION AND COMARISON**. CNEL is the common noise measurement system utilized by local governments within this region, and the CNEL information would allow for a better understanding of the existing ambient noise levels and of the impacts of the project upon those CNEL noise levels.

7-12

- Section C, **ENVIRONMENTAL ANALYSIS**, Subsection C.3, **TRAFFIC AND CIRCULATION**, page C.3-9, **Route 60**:

The description of this route indicates it is in the City of Westminster. The route extends into the City of Seal Beach and this should be indicated in this paragraph. This same comment is applicable to page C.3-16, under similar discussion on Route 60.

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- Section C, **ENVIRONMENTAL ANALYSIS**, Subsection C.3, **TRAFFIC AND CIRCULATION**, subsection C.3.2.2, **Impacts of the Proposed Water Transmission Line**, Mitigation Measures T-1 and T-2, page C.3-12:

The City had requested in its comments on the NOP to be able to review and approve traffic control plans and haul route plans. These mitigation measures

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adequately addresses our concerns and the City of Seal Beach supports the imposition of these mitigation measures.

- Section C, **ENVIRONMENTAL ANALYSIS**, Subsection C.3, **TRAFFIC AND CIRCULATION**, subsection C.3.2.2, **Impacts of the Proposed Water Transmission Line, Impacts on Local Development Access, Bolsa Chica Road – Rancho Road to Old Bolsa Chica Road**, page C.3-13:

This section provides an overview of transportation impacts along this segment of Bolsa Chica Road. The description and discussion needs to be revised to reflect the following concerns of the City:

- The City's Bolsa Chica Well Site is accessed from Old Bolsa Chica Road and will be impacted. Provisions for access will be a requirement within the City's Public Works Permit.
- The terminus of Old Bolsa Chica Road at the freeway is a primary access for the farming operation on the Naval Weapons Station.
- The terminus of Old Bolsa Chica Road also serves as access to the utility easement (formerly Garden Grove Boulevard right of way) which parallels the I-405 from Seal Beach Boulevard and contains telephone and gas transmission facilities.

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- Section C, **ENVIRONMENTAL ANALYSIS**, Subsection C.4, **ENVIRONMENTAL CONTAMINATION**, subsection C.4.1.1 **Environmental Baseline, Existing Contamination Sites Along the Pipeline ROW** page C.4-6, first paragraph:

The referenced paragraph indicates no environmental contamination was revealed by a database search at any of these sites, including the Los Alamitos Armed Forces Reserve Center, The U. S. Naval Weapons Station, and the Boeing Company Huntington Beach Facility. This statement is incorrect relative to the Naval Weapons Station. There are numerous sites within the Naval Weapons Station undergoing various stages of remediation activity. Please contact Pei-Fen Tamashiro, Installation Restoration Coordinator, Naval Weapons Station Seal Beach, at (562) 626-7897 to obtain information regarding the ongoing installation restoration activities at the Naval Weapons Station. If the intent of the subject paragraph is to indicate there are no identified sites within the stated facilities that would have the potential to be impacted by the project, the paragraph should be clarified. Otherwise, there should be additional language provided regarding the various Installation Restoration activities of the Seal Beach Naval Weapons Station.

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- Section C, **ENVIRONMENTAL ANALYSIS**, Subsection C.4, **ENVIRONMENTAL CONTAMINATION**, subsection C.4.2.2 **Construction Impacts**, page C.4-9 and C.4-10, **Mitigation Measures EC-1, EC-2, EC-3 and EC-4**:

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The referenced mitigation measures indicates "low", "medium" and "high" potential sites for environmental contamination shall be reevaluated by a qualified and approved environmental consultant, with the results reviewed and approved by the appropriate County Health Department or Department of Toxic Substances Control (DTSC) prior to construction and also discuss the preparation of "contingency" plans if necessary. The City of Seal Beach requests the opportunity to review and provide comments to the appropriate approval agency on any such reports prepared regarding environmental contamination sites within our city limits. Please have any such documents, including evaluation plans, excavation plans, health and safety plans, site closeout reports, contingency plans, etc., forwarded to Lee Whittenberg, Director of Development Services, 211 Eighth Street, Seal Beach, CA 90740 for review and comment to the appropriate reviewing agency.

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- Section C, **ENVIRONMENTAL ANALYSIS**, Subsection C.4, **ENVIRONMENTAL CONTAMINATION**, subsection C.4.2.2 **Construction Impacts**, page C.4-9 and C.4-10, **Mitigation Measures EC-1, EC-2, EC-3 and EC-4:**

The referenced mitigation measures, at the conclusion of mitigation measure EC-3 and EC-4, indicates additional actions that may be taken regarding the preparation of health and safety plans (paragraph following mitigation measure EC-3) and contingency plans (paragraph following mitigation measure EC-4). The format of these paragraphs make it unclear if these paragraphs are to be incorporated into the preceding respective mitigation measure. It appears from the language of these paragraphs that is the intent. It is requested that these paragraphs be clearly incorporated into the preceding respective mitigation measure, as the provisions of the subject paragraphs seem to directly relate to the preceding respective mitigation measure.

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- Section C, **ENVIRONMENTAL ANALYSIS**, Subsection C.4, **ENVIRONMENTAL CONTAMINATION**, subsection C.4.3 **REFERENCES**, page C.4-11:

The reference is to a report titled "The EDR Corridor Study Report, Bolsa Chica Waterline #1", prepared by Environmental Data Resources, dated October 1999. The City requests a copy of the referenced report for our information and files, as it would provide useful background information regarding potential and existing environmental contamination sites within our City. Please provide a copy of the EDR report to Lee Whittenberg, Director of Development Services, 211 Eighth Street, Seal Beach, CA 90740 for our files.

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- Section C, **ENVIRONMENTAL ANALYSIS**, Section C-5, **GEOLOGY AND SOILS**, Subsection C.5.1.1, **Environmental Baseline, Fault Rupture**, first paragraph, fourth sentence, page C.5-3 and continuing to page C.5-4:

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The sentence discusses the location of “. . . *projected trace of the Los Alamitos fault intersects the pipeline at the intersection of the 405 Freeway and Winchester Avenue.*” Please verify the street name and correct as appropriate; it is probably “Westminster Avenue.

- Section C, **ENVIRONMENTAL ANALYSIS**, Subsection C.5, **GEOLOGY AND SOILS**, subsection C.5.3 **REFERENCES**, page C.5-13 and C.5-14:

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The references include two reports prepared by Toro International, titled “Preliminary Geotechnical Investigation, Bolsa Chica Pipeline Segment 1” and “Geotechnical Memorandum, Proposed Pipe Jacking Underneath Freeways 405 and 22, Bolsa Chica Pipeline Segment 2”, dated 1998. The City requests a copy of the referenced reports for our information and files, as they could provide useful background information regarding potential geologic issues within our City. Please provide a copy of the indicated Toro International reports to Lee Whittenberg, Director of Development Services, 211 Eighth Street, Seal Beach, CA 90740 for our files.

- Section C, **ENVIRONMENTAL ANALYSIS**, Subsection C.6, **HYDROLOGY AND WATER QUALITY**, subsection C.6.2.2 **Construction Impacts**, page C.6-16:

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The third paragraph indicates dewatering may be required if shallow groundwater or perched aquifers are encountered. This paragraph also indicates that compliance with a construction-related NPDES Dewatering permit, in addition to the applicant’s existing commitments, will reduce impacts to a less than significant level. There is no indication of what are the “applicant’s existing commitments”. Those commitments should be presented either in the appropriate subsections of Section C or as an appendix, so the reviewing public may fully understand the extent of those “existing commitments”. It would seem appropriate to include mitigation measures relative to obtaining and complying with all NPDES Permit requirements and specifying the “applicant’s existing commitments” as mitigation measures. Setting forth these additional mitigation measures will fully respond to the concerns of the City of Seal Beach regarding water table impact issues set forth in our response letter to the Notice of Preparation. The City again requests the ability to review and comment on the Storm Water Pollution Prevention Plan (SWPPP), prior to the completion of that plan.

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- Section C, ENVIRONMENTAL ANALYSIS, Subsection C.7, CULTURAL RESOURCES, subsection C.7.2.2 CONSTRUCTION IMPACTS, Mitigation Measure CR-1, CR-2, CR-3 and CR-4 pages C.7-14 through CR.7-16:

Mitigation Measure CR-1 requires a "SCWC shall provide a qualified archaeological monitor at excavations for the proposed pipeline where it passes through areas of moderate to high sensitivity for prehistoric and historic resources". Given the potential to encounter buried deposits along the proposed pipeline route, as evidenced by our comments and documentation provided in response to the Notice of Preparation, it is requested that a qualified Native American monitor also be present during these excavation activities, as is proposed in Mitigation Measure CR-2. It is also requested that the archaeological and Native American monitor be present during "all excavation activities, including areas identified as having a low sensitivity for prehistoric and historic resources". The City had previously requested that a Phase I Site Survey of the Old Bolsa Chica Road area and the Bolsa Chica Channel should be undertaken in preparation of the EIR, at a minimum. The City is disappointed that request was not acted upon in the preparation of the DSEIR document, and is therefore requesting the modification to the language of this mitigation measure to provide a Native American monitor presence during excavation activities in all areas of excavation.

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The City of Seal Beach supports the language and intent of Mitigation Measures CR-2 through CR-4, which provides for both a qualified archaeological monitor and a Native American monitor at excavations within the vicinity of prehistoric site CA-ORA-83/86/144, CA-ORA 84/85/288 and the area of the pipeline connection to the underground reservoir on Bolsa Chica mesa. In addition, the City of Seal Beach supports the required formal testing program in the area of the pipeline connection to the underground reservoir on Bolsa Chica mesa.

- Section C, ENVIRONMENTAL ANALYSIS, Subsection C.7, CULTURAL RESOURCES, subsection C.7.3 BIBLIOGRAPHY, page C.7-19:

The bibliography includes a report prepared by McKenna et al., titled "Cultural Resources Investigation for the Proposed SCWC Bolsa Chica Waterline and Wastewater Service Project, City of Huntington Beach and Unincorporated Orange County, California", dated 1999. The City requests a copy of the referenced reports for our information and files, as they could provide useful background information regarding potential cultural resource sites within our City. Please provide a copy of the indicated McKenna et al. report to Lee Whittenberg, Director of Development Services, 211 Eighth Street, Seal Beach, CA 90740 for

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our files. The City of Seal Beach has an Archaeological Advisory Committee that reviews and makes recommendations to our City Council regarding impacts to cultural resource sites within our community, and this document should be available for their information as they may review other areas within the Seal Beach Naval Weapons Station in the future.

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- Section C, ENVIRONMENTAL ANALYSIS, Subsection C.8, BIOLOGICAL RESOURCES, subsection C.8.2.2 CONSTRUCTION IMPACTS, Mitigation Measure B-1, page C.8-8:

The City of Seal Beach supports the language and intent of Mitigation Measures B-1, which provides for a biological survey of the area along Old Bolsa Chica Road if construction is to take place between May 15 and August 15. The intent of this mitigation measure is to protect territorial pairs or nests of a bird listed under the Migratory Bird Act (Title 50) of the Code of Federal Regulations.

7-25

- Section C, ENVIRONMENTAL ANALYSIS, Subsection C.9, LAND USE AND RECREATION, subsection C.9.1.1 Land Use, Segment 4, Land Use, page C.9-10:

The paragraph indicates the residential precinct to the west of the proposed alignment is referred to as "College Park West". That is incorrect, the area is referred to as "College Park East"; please correct all references accordingly.

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- Section C, ENVIRONMENTAL ANALYSIS, Subsection C.9, LAND USE AND RECREATION, subsection C.9.1.2 Recreation, City of Seal Beach, page C.9-13:

The paragraph indicates an "aquatic regional park" is located on the Naval Weapons Station. That is incorrect, the area is referred to as "Sunset Marina" and is owned by the County of Orange on property not within the Naval Weapons Station; please correct all references accordingly.

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- Section C, ENVIRONMENTAL ANALYSIS, Subsection C.10, PUBLIC SERVICES AND UTILITIES, subsection C.10.1.1 Public Services, Fire Protection, page C.10-1:

The first paragraph of this subsection indicates four cities – Cypress, Los Alamitos, Seal Beach and Westminster – are served by the "Orange County Fire Department (OCFD)". The agency designation is incorrect, the agency is referred to as the "Orange County Fire Authority (OCFA)"; please correct all references accordingly.

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- Section C, **ENVIRONMENTAL ANALYSIS**, Subsection C.10, **PUBLIC SERVICES AND UTILITIES**, subsection C.10.1.1 **Public Services, Libraries**, Table C.10-4, **Libraries in the Proposed Project Area**, page C.10-7:

This table indicates the Los Alamitos/Rossmoor Library is within the City of Los Alamitos. The city location is incorrect. Although the library primarily serves the City of Los Alamitos and the unincorporated community of Rossmoor, it is located within the City of Seal Beach; please correct all references accordingly within Table C.10-4 and the accompanying city descriptions on page C.10-8 for Los Alamitos and Seal Beach.

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- Section C, **ENVIRONMENTAL ANALYSIS**, Subsection C.10, **PUBLIC SERVICES AND UTILITIES**, subsection C.10.1.2 **Utilities**, Table C.10-5, **Utilities Adjacent to the Proposed Route Alignment by Segment**, page C.10-10:

Please add the City of Seal Beach 12" water transmission line to the Segment 6 parallel facilities, west side of Old Bolsa Chica Road

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- Section C, **ENVIRONMENTAL ANALYSIS**, Subsection C.10, **PUBLIC SERVICES AND UTILITIES**, subsection C.10.2.3 **Construction Impacts, Mitigation Measure PS-1**, page C.10-15:

The City of Seal Beach requests this mitigation measure be enhanced to specify that all potentially affected agencies be notified since the project primarily occurs along common city boundaries. As an example, the Seal Beach Police Department and other emergency services often utilize Bolsa Chica Road to access Old Bolsa Chica Road and the College Park East neighborhood. The City of Seal Beach supports this mitigation measure, as requested to be amended, as it responds to a concern of the City expressed in our comments regarding the Notice of Preparation and the above comments.

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- Section C, **ENVIRONMENTAL ANALYSIS**, Subsection C.10, **PUBLIC SERVICES AND UTILITIES**, subsection C.10.2.3 **Construction Impacts, Utilities**, page C.10-16:

No mitigation measure is proposed to reduce potential utility service disruptions during construction activities. The City request formulation of an additional mitigation measure to prevent potential disruptions of water and other utility service and to protect from potential accidental damage to those utilities. As an example, the City of Seal Beach could be severely impacted regarding access to the City's Bolsa Chica Well site on Old Bolsa Chica Road. This well site is a

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critical link in the City’s water system and access to this site must be preserved. In addition, much of the work in Segment 6 will be in the vicinity of Seal Beach water transmission lines. Again, the City must be notified when work is occurring in this area to ensure a timely emergency response if necessary. The City of Seal Beach strongly requests a mitigation measure similar to PS-1 be required to specify that all potentially affected public utility agencies be notified since the project primarily occurs along common city boundaries, which quite often contain many different service provider lines.

7-32

- Section D, **ALTERNATIVES DESCRIPTION AND ANALYSIS**, Subsection D.1.3, **SUMMARY OF SCREENING RESULTS**, Table D.1-1, **Alternatives Screening Recommendations**, page D-4:

For the same reasons that the Westminster/Seal Beach Boulevard alternative was eliminated, the North Seal Beach Wellfield should be eliminated as well. The North Seal Beach Wellfield alternative will add one mile of additional street construction impacts over the proposed project. The proposed project alignment is within existing utility and non-roadway rights of way north of Lampson Avenue, whereas, the alternate alignment will effect one mile of Lampson Avenue and produce substantial traffic impacts.

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- Section D, **ALTERNATIVES DESCRIPTION AND ANALYSIS**, Subsection D.1.4.3, **Westminster Avenue/Seal Beach Boulevard**, page D-8:

The second paragraph of this subsection discusses the potential of utilizing an onsite groundwater well as a supplemental water source. This paragraph seems to be inappropriate for the discussion of the above alternative, which discusses potential use of the West Los Alamitos Wellfield as a source of water. Please review and remove or revise paragraph to clarify the intent of the paragraph in relation to the subject alternative.

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- Section D, **ALTERNATIVES DESCRIPTION AND ANALYSIS**, Subsection D.2, **ALTERNATIVES SELECTED FOR COMPARATIVE EVALUATION**, Figure D-2, **Route Alternatives Analyzed in the EIR**, page D-11:

This Table indicates a route alternative of “Bolsa Chica channel” being evaluated in the EIR, which is not the case. The “Bolsa Chica Channel” alternative is indicated on page D-4 as an “Alternative Eliminated from Further Consideration”. Please revise Figure D-2 accordingly.

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- Section D, **ALTERNATIVES DESCRIPTION AND ANALYSIS**, Subsection D.2.4, **ALTERNATIVE 4: NORTH SEAL BEACH WELLFIELD**, pages D-13 and 14:

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The proposed North Seal Wellfield falls within the jurisdiction of Seal Beach. The City of Seal Beach does not have any existing well facilities within the area shown on Figure D-2, page D-11. However, the City does intend to build a facility in the future near the location shown to improve reliability in our system that is north of the I-405 Freeway. The City's existing well facilities are located on Beverly Manor Road and on Old Bolsa Chica Road. Any future consideration of this alternative must include a detailed technical feasibility study that considers and complies with to the City's Water System Master Plan and the Orange County Water District 2020 Master Plan.

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- Appendix 1, Pipeline Route Segment Maps, Sheet 2 of 19, Water Transmission Line Route Maps, page 1-2:

7-37

This Sheet indicates "City Boundaries" between the cities of Cypress and Los Angeles. The city boundaries should be between Cypress and Los Alamitos, please correct as appropriate.

- Appendix 1, Pipeline Route Segment Maps, Sheet 5 of 19, Water Transmission Line Route Maps, page 1-5:

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This Sheet indicates "City Boundaries" between the cities of Garden Grove, Seal Beach and Los Alamitos, north of Lampson Avenue. The city boundaries do not appear to be correct, please review and correct as appropriate.

In addition, there is a City-owned 12" water line located in the Bolsa Chica channel at the I-405/22 Freeway. Particular attention needs to be given to the protection of the integrity of that line during the water line installation. The City requests the ability to review project construction plans prior to initiation of construction activities in the immediate area of the water line to ensure adequate protection of this water line. In addition, as requested in our response letter regarding the Notice of Preparation, the City would request imposition of a mitigation measure requiring SCWC to provide an emergency connection between their proposed water transmission line and this existing City water transmission line. The usefulness of an emergency connection cannot be understated in providing the ability for the City and SCWC to better respond in an emergency situation with the existence of the requested emergency interconnection.

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The City Council considered and discussed the DSEIR document on January 10, 2000. The City Council authorized the Mayor to sign this letter indicating the official comments of the City of Seal Beach.

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SCH : 99071049
January 10, 2000*

Upon the preparation of the Final EIR for this project, please send two (2) copies to Mr. Lee Whittenberg, Director of Development Services, City Hall, 211 Eighth Street, Seal Beach, 90740. Thank you for your consideration of the comments of the City of Seal Beach. If you have questions concerning this matter, please do not hesitate to contact Mr. Whittenberg at (562) 431-2527, extension 313. He will be most happy to provide any additional information or to provide clarification of the matters discussed in this comment letter

Sincerely,



Paul Yost, Mayor
City of Seal Beach

Distribution:

Seal Beach City Council	City Manager
Seal Beach Planning Commission	Director of Development Services
Seal Beach Environmental Quality Control Board	
Seal Beach Archaeological Advisory Committee	

RESPONSES TO THE CITY OF SEAL BEACH**Letter Dated January 10, 2000**

- 7-1 The Applicant has already undertaken coordination with the Orange County Flood Control District in establishing the alignment for the proposed water line and in conducting preliminary design of the pipeline. Since the water line as proposed would be partially located within OCFD right-of-way, additional coordination would be mandatory for the project to proceed. The Applicant is aware of improvements planned for Bolsa Chica Channel and has specifically designed the pipeline to be compatible with OCFD's construction plans.
- 7-2 The CPUC agrees that Alternative 4 (the North Seal Beach Wellfields) is not an attractive alternative from an environmental standpoint. The Draft SEIR describes the impacts associated with this alternative and, in doing so, demonstrates why use of other water sources is more desirable. However, future connection to the North Seal Beach Wellfields was considered a feasible alternative at the time the Draft SEIR was prepared and was one of the alternatives presented to the CPUC by the Applicant in the Proponent's Environmental Assessment. The Final SEIR has been changed to clarify that the North Seal Beach Wellfields are not existing facilities.
- 7-3 Purely economic considerations are not an appropriate topic for an EIR. An EIR is intended to focus on the impacts that a Proposed Project would have on the physical environment. Issues pertaining to the reasonableness of rates and charges are being addressed separately in the CPUC's Proceeding in accordance with the Administrative Law Judge's scoping memo (dated March 16, 1999).
- 7-4 The correction to the text has been made as suggested, thank you.
- 7-5 Noted. At this point, we do not know whether the pipeline would cross through any identified cultural resource sites. However, since nearby cultural resource site boundaries are not clearly defined, the SEIR acknowledges that it's possible that cultural resources could be encountered during construction, potentially resulting in revised boundaries for nearby sites or the identification of a new site.
- 7-6 Copies of comment letters received in response to the NOP have been included in Appendix 2 of the Final SEIR. The Lead Agency uses this input to determine the appropriate scope of issues to be examined in the EIR. All issues raised during the NOP process are not necessarily addressed in the SEIR.
- 7-7 As this request is not related to a significant impact identified in the SEIR, the SEIR cannot impose the City's request as a requirement (i.e., as a mitigation measure). We encourage the City to consult directly with the SCWC on this matter.
- 7-8 The discrepancy in the text has been corrected.
- 7-9 Corrected as suggested.
- 7-10 With regard to CO Hot Spots, it is assumed that the CO concentrations during construction would be very similar to existing conditions along the pipeline alignment. Currently, Bolsa Chica Roadway is at Level of Service (LOS) D, and a majority of the intersections are at or

near LOS F. Bolsa Chica Roadway and associated intersections have three lanes in each direction and are all highly congested, especially during peak hours.

If the construction ROW is restricted to one lane, a smaller number of cars would be idling at any given location (cars would be removed from lanes where construction is occurring). Instead of three lanes operating at LOS F, you have only one lane operating at LOS F. However, during construction, the traffic backup would be significant, dispersing the CO emissions over a greater area. Overall, the CO concentrations would be very similar to the existing conditions.

In addition, Traffic Measure T-1 would help to reduce the congestion along the construction rights-of-way. Traffic Measure T-1 requires the Applicant to prepare a traffic control/management plan, which provide details regarding the placement of traffic control, warning devices, and detours. This measure would help to reduce traffic congestion along Bolsa Chica Road, as well as the CO concentrations.

7-11 Comment noted.

7-12 Figure C.2-3 has been modified in response to the comment. With regard to CNEL, the noise level units (Leq) provided in Table C.2-2 correspond with the units listed in all the local agency ordinance limits. In addition, the noise units also correspond with USEPA's guidelines on recommended noise levels to protect public health and welfare (Table C.2-4). Further, the significance criteria also used the same units. The SEIR preparers believe that the noise units provided in Section C.2 are appropriate for identifying ambient noise levels and in evaluating impacts associated with the project.

7-13 The comment has been noted and the referenced text has been revised.

7-14 Thank you for your comment.

7-15 Comment has been noted and the referenced text has been revised.

7-16 During preparation of the Draft SEIR, Pei-Fen Tamashiro, Installation Restoration Coordinator for the 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.

Database search results did not reveal any contaminated sites at the Boeing Company campus in the vicinity of the water line alignment. In addition, the distance of facilities at the Boeing Company campus relative to the project alignments (separated by roads, parking lots, and office building), indicates a low potential to impact the project.

7-17 The text of the Final SEIR has been amended to provide cities with an opportunity to review relevant documentation.

7-18 The two referenced paragraphs are part of each preceding mitigation measure and should be indented to indicate this fact. The text of the document has been changed to reflect this.

- 7-19 Arrangements can be made for the CPUC to provide a copy of the requested report to the City of Seal Beach.
- 7-20 The street name has been corrected to read “Westminster Avenue,” not “Winchester Avenue.”
- 7-21 Arrangements can be made for the CPUC to provide copies of the requested reports to the City of Seal Beach.
- 7-22 The Clean Water Act requires that all discharges from any point source into waters of the United States must obtain a NPDES permit. The reason for obtaining a permit is to protect public health and the nation’s waters. Best Management Practices used to ensure compliance with NPDES and construction permits typically include:
- Straw mulch with tackifier to temporarily stabilize earth uncovered during construction
 - The application of bonded fiber matrix (with or without seed) to provide longer term stabilization of earth
 - Silt fences
 - Sand bags
 - Storm drain inlet protection and sediment traps.
- The applicant will need to implement all measures to remain in compliance with NPDES and construction permits. As requested the description of the regulatory setting in the Draft SEIR (Section C.6.1.2) has been revised to include Best Management Practices.
- The Applicant’s Environmental Commitments are discussed in Section C.6.2.1 of the SEIR.
- 7-23 Noted. Whether a Native American should monitor construction is somewhat of a judgment call, rather than a clear requirement. Given the nature of the project, the extent of monitoring and the involvement by Native American monitors can be established based on tribal interest. Please note that the mitigation measure does not preclude the presence of Native American monitors.
- With the exception of Bolsa Chica Mesa, the proposed pipeline is completely located in areas of “built” environments. Therefore, a Phase I survey of Old Bolsa Chica Road would be of no archaeological value. The alternatives were subjected to a “windshield” survey to verify the “built” environmental status of the pipeline alignment. The paved surfaces and vegetation in such areas do not allow visibility of the ground surface and, therefore, Phase I surveys are not useful. As a result, it was concluded that the completion of a Phase I survey (which is different than a Phase I study) was not warranted.
- 7-24 The CPUC can provide a copy of the referenced report to the City. Please remember that all information contained in the report regarding the locations of archaeological sites should remain confidential and should not be made available to the general public.
- 7-25 Noted, thank you.
- 7-26 The mistake has been corrected; the residential area is now referred to as College Park East in the Final SEIR.
- 7-27 This error has been corrected as suggested.

- 7-28 Comment noted. This has been corrected in the Final SEIR.
- 7-29 Comment noted. This has been corrected in the Final SEIR.
- 7-30 Comment noted, thank you.
- 7-31 Comment noted and change made as suggested.
- 7-32 Please see the response to Comment 8-10
- 7-33 The North Seal Beach Wellfields were included in the alternatives analysis because they were an alternative examined by the Applicant in the Proponent's Environmental Assessment and, at least initially, this alternative appeared to have the potential to offer environmental advantages over the other alternatives. As the analysis in the SEIR demonstrates, this alternative would result in various impacts that are greater than the Proposed Project and for this reason it is not identified as superior to the Proposed Project.
- 7-34 The text of the Draft SEIR has been corrected as suggested.
- 7-35 Corrected as suggested.
- 7-36 Comment noted. This alternative was originally described and analyzed by the proponent in the Proponent's Environmental Assessment. The text of the SEIR has been revised to clarify that the North Seal Beach Wellfields are not existing facilities.
- 7-37 Corrected as suggested.
- 7-38 Corrected as suggested.
- 7-39 Regarding the first comment (protection of the water line at the I-405/22) please see the response to Comment 8-10.

Regarding the second comment (connection of water lines), mitigation measures are designed to mitigate potentially significant impacts to a less-than-significant level. It would be inappropriate for the CPUC to assign a mitigation measure that is not associated with a potentially significant impact. However, there appear to be good reasons to consider an emergency connection between the proposed pipeline and the existing Seal Beach water pipeline. The City of Seal Beach should consult with the SCWC directly on this matter. Finally, it should be noted that the applicant is also considering emergency interconnections between several other water transmission lines.