

# Section 1

## Introduction

This *City of Los Angeles, Integrated Resources Plan Draft Environmental Impact Report* (EIR) analyzes the impacts that would occur as a result of implementing the proposed wastewater treatment and water resource management components documented in the *City of Los Angeles, Integrated Resources Plan, Facilities Plan* (IRP Facilities Plan) (City of Los Angeles, 2004). The City of Los Angeles, Department of Public Works (LADPW) is the CEQA Lead Agency for this EIR, and the Los Angeles City Council will use this EIR to help with the selection and approval of an alternative to implement.

The EIR analyzes four Project Alternatives (see Section 2.3.3 of this EIR for a description of the alternatives) that encompass actions within the initial jurisdiction of both the LADPW and the LADWP. A fifth alternative, the No Project Alternative, is also analyzed to allow decisionmakers to compare the impacts of approving a proposed alternative and its components compared with the impacts of not approving the proposed alternative, in accordance with CEQA, Section 15126.6(e).

### 1.1 Document Overview

This EIR was prepared in accordance with CEQA and the implementing guidelines for EIRs (see Section 1.2.1). The Lead Agency has evaluated, directed, and supervised the preparation of this document.

Section 1 of this EIR presents a document overview, requirements for environmental review, and the objectives of the Lead Agency (Sections 1.1, 1.2, and 1.3). Section 1 also includes a summary discussion of the IRP and four Proposed Project Alternatives (Section 1.4) and the intended uses of the document (Section 1.5). Areas of controversy and issues to be resolved are presented (Sections 1.6 and 1.7), and public outreach (Section 1.8) and alternatives considered but withdrawn (Section 1.9) are discussed.

In addition to Section 1, this EIR contains the following sections:

- Section 2: Project Description
- Section 3: Environmental Settings and Impacts
- Section 4: Other Environmental Considerations
- Section 5: Persons and Organizations Contacted
- Section 6: List of Preparers
- Section 7: References
- Appendixes

### 1.2 Requirements for Environmental Review

This section presents the CEQA requirements for assessing environmental impacts and introduces the components of the IRP evaluated at a Project-level and program-level of detail.



## 1.2.1 California Environmental Quality Act

This EIR has been prepared in accordance with CEQA (Public Resources Code [PRC] 21000 et seq.) and the state CEQA guidelines. Environmental impacts are measured against the baseline physical conditions (CEQA Guidelines 15125[a]). In addition, the No Project Alternative (CEQA Guidelines, Section 15126.6[e]) is evaluated. Table 1-1 provides a cross-reference of issues required under CEQA and their location in this EIR.

<b>Table 1-1. Cross-Reference for CEQA Contents</b> <i>Integrated Resources Plan EIR</i>			
<b>Section of CEQA</b>	<b>Guidelines Topic</b>	<b>Additional Content Required by CEQA</b>	<b>Location in EIR</b>
15122	Table of Contents or Index	Not Applicable	A Table of Contents is provided.
15123	Summary	Not Applicable	Executive Summary provided at beginning of document.
15124	Project Description	Not Applicable	Section 2: Project Description. (The preferred Project Alternative will be identified in the Final EIR)
15125	Environmental Setting	Not Applicable	Section 3: Environmental Settings, Impacts, and Mitigations
15126	Consideration and Discussion of Environmental Impacts	Significant environmental impacts and significant environmental effects that cannot be avoided  Growth-inducing impacts  Mitigation Measures	Section 3: Environmental Settings, Impacts, and Mitigations  Section 4: Other Environmental Considerations  Section 3: Environmental Settings, Impacts, and Mitigations
15127	Limitations on Discussion of Environmental Impact	Irreversible changes	Section 3: Environmental Settings, Impacts, and Mitigations
15128	Effects Not Significant	Not Applicable	Section 3 Environmental Settings, Impacts, and Mitigations
15129	Organizations and Persons Consulted	List of Preparers  Organizations and Persons Contacted  References	Section 6  Section 5  Section 8  Appendix A
15130	Discussion of Cumulative Impacts	Not Applicable	Section 3: Environmental Settings, Impacts, and Mitigations
15131	Economic and Social Effects	Not Applicable	Section 3.8: Environmental Justice

The CEQA Guidelines (Article 9, Section 15126[d]) require an evaluation describing a range of reasonable alternatives “which would reasonably attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” Specific applicable elements of the CEQA Guidelines are:

- **Purpose.** The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. (Section 15126[d][1])
- **Reasonable Range of Alternatives.** The EIR is required to include alternatives that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant effect. (Section 15126[d][2])
- **Evaluation.** The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison of the proposed project. If an alternative to the proposed project results in significant effects (in addition to those caused by the proposed project), the significant effects of the alternatives shall be discussed but in less detail than the significant effects of the project as proposed. (Section 15126[d][3])
- **No Project.** A “no project” alternative must be evaluated with the impact. If the “no project” alternative is not the environmentally superior alternative, the EIR is required to identify an environmentally superior alternative among the other alternatives. (Section 15126[d][4])
- **Rule of Reason.** The “rule of reason,” which requires that the EIR set forth only those alternatives that are necessary to permit a reasoned choice, governs the required range of alternatives to be included in an EIR. An EIR must examine in detail only the alternatives that the lead agency determines could feasibly attain most of the basic objectives of the project. In addition, the range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. (Section 15126[d][5])

This EIR has been prepared by the City of Los Angeles to inform the public and decisionmakers (Los Angeles City Council) of the anticipated environmental effects of the Proposed Project Alternatives (see Section 2 for a description of the components and Alternatives evaluated in the EIR), identify feasible mitigation measures that would lessen or avoid significant environmental impacts, disclose unavoidable environmental impacts, and identify the environmentally superior alternative.

CEQA requires the decision-making body to balance, as applicable, the economic, legal, social, technological, or other benefits of a project against the unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of the project outweigh the unavoidable significant environmental effects, the significant environmental effects may be considered acceptable.



When the Lead Agency approves a project that will result in significant impacts identified in the EIR but the impacts are not avoided or substantially lessened, the agency must state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. This statement of overriding considerations must be supported by substantial evidence in the record. In addition, pursuant to Section 21081.6 of the PRC, when approving a project, public agencies also must adopt a mitigation monitoring or reporting program for the changes that were incorporated into the project or made a condition of project approval to mitigate or avoid significant environmental effects.

## **1.2.2 Level of Analysis and Future Environmental Documentation**

According to Section 15161 of the CEQA Guidelines, a project EIR examines the environmental effects of a specific project and generally provides a detailed level of discussion and evaluation of all phases of the project, including construction and operation. Because the Proposed Project Alternatives are composed of various components from the IRP Facilities Plan, each alternative in this EIR is evaluated at a co-equal level. Section 2 of this EIR describes the various wastewater treatment and water resource management components that comprise the four alternatives evaluated in this EIR. The City of Los Angeles will identify the preferred Project Alternative (Proposed Project) for the implementation of the IRP after circulation of the Draft EIR and prior to certification of the Final EIR.

As discussed in detail in Section 2, the Alternatives have been developed from the various components of the IRP Facilities Plan. The Alternatives include components evaluated at a project (or site-specific) level of analysis (see Section 2.2) and others that are evaluated at a program-level (see Section 2.3). Upon adoption of the preferred Project Alternative, no additional environmental documentation is anticipated for the individual project-level components listed based on the level of description of the components and commensurate analysis in this EIR.

Subsequent environmental analysis would be conducted for the components evaluated at a program level. The documentation required will be assessed on the basis of the specific project description and site locale of those components. Section 2.2 describes the project-level and program-level approach used in this EIR.

## **1.3 Project Objectives**

Section 15124(b) of the CEQA Guidelines requires an EIR to include a statement of project objectives. The objectives will help the City of Los Angeles to evaluate the four proposed Project Alternatives and the No Project Alternative and will help decisionmakers select a Preferred Alternative. The objectives of the four Project Alternatives are to:

- Comply with all regulations protecting public health and the environment
- Meet projected wastewater system needs of the City of Los Angeles
- Protect the public from environmental hazards related to water

- Maximize system reliability
- Enhance the efficient use of system assets
- Conform to sustainability guidelines of the City
- Enhance the efficient use of natural resources (conservation, recycling, beneficial uses of stormwater)
- Promote water self-sufficiency
- Promote outreach on technology and operations
- Manage biosolids in accordance with applicable regulations
- Provide for safe use of recycled water
- Provide education on the benefits of recycled water
- Provide education on stormwater (runoff) issues
- Protect the ocean, beaches, and watersheds and their associated uses
- Protect air quality
- Promote environmental justice
- Enhance public lands where possible
- Provide services cost-effectively
- Allocate costs equitably
- Maximize economic benefits to Los Angeles
- Maximize external funding opportunities

## 1.4 IRP Facilities Plan Background

This section provides a summary of the IRP Facilities Plan to provide context for the discussion of the Proposed Project Alternatives (see Section 2) and an overview of the City of Los Angeles infrastructure in the Hyperion Service Area (has), which defines the boundaries of the assessment area of this EIR. The Terminal Island Service Area (TISA) is also described to provide a context for the recycled water pipelines evaluated in this EIR.

### 1.4.1 Summary of IRP Facilities Plan Process

The IRP Facilities Plan is an integrated wastewater facilities plan that describes the existing wastewater, recycled water, and runoff (stormwater) systems in the City of Los Angeles, identifies system inadequacies based on the needs projected for the year 2020, and provides recommended alternatives to address the future systems needs.

Future population increases in the City of Los Angeles and its service areas would result in increased wastewater flows that must be managed safely. Flow model projections developed by the City of Los Angeles (based on per capita water consumption for residents and employees, Southern California Association of



Governments [SCAG] 2001 projections, projected wastewater generation by large industrial, and groundwater inflow to the wastewater system) show that the existing wastewater generation in the HSA (443 million gallons per day [mgd] in 2000) will increase to over 511 mgd by the year 2020 (City of Los Angeles 2004). In addition, existing and future laws and regulations are likely to require additional facilities, facility improvements, or new strategies for managing wastewater, recycled water, and urban runoff in the future.

The IRP is documented in four volumes, as described below (City of Los Angeles, 2004):

- *Integrated Resources Plan Facilities Plan – Volume 1: Wastewater Management*  
Volume 1 describes the existing wastewater system of the City, identifies wastewater system demands in the year 2020, and identifies the shortfall between the existing wastewater system and future wastewater system demands.
- *Integrated Resources Plan Facilities Plan – Volume 2: Water Management*  
Volume 2 describes the existing recycled water management system of the City, identifies recycled water system demands in the year 2020, and identifies the shortfall between the existing recycled water system and future recycled water system demands.
- *Integrated Resources Plan Facilities Plan – Volume 3: Runoff Management*  
Volume 3 describes the existing runoff management system of the City, identifies runoff management system demands in the year 2020, and identifies the shortfall between the existing runoff management system and future runoff management system demands.
- *Integrated Resources Plan Facilities Plan – Volume 4: Alternatives Development and Analysis*  
Volume 4 documents the development, evaluation, and identification of four integrated Alternatives (based on information in Volumes 1, 2, and 3) that would meet the future wastewater system, recycled water system, and runoff system needs of the City of Los Angeles in the year 2020.

The IRP presents four Alternatives to meet the future wastewater system needs of the City of Los Angeles in the year 2020 and integrates the recycled water and the runoff systems:

- Alternative 1: Hyperion Expansion to 500 mgd
- Alternative 2: Tillman Expansion (to 80 mgd) and Los Angeles-Glendale Expansion (to 30 mgd)
- Alternative 3: Tillman Expansion (to 100 mgd) without Cisterns
- Alternative 4: Tillman Expansion (to 100 mgd) with Cisterns
- No Project Alternative

The Alternative development process is described in Section 2.3.1. The four Project Alternatives and the No Project Alternative are described in detail in Section 2, Project Description, and are evaluated in Section 3 of this EIR.

## **1.4.2 Existing Wastewater, Recycled Water, and Runoff Management Infrastructure and Measures**

The City of Los Angeles operates and maintains an existing wastewater treatment system, a recycled water distribution system, and a runoff management system and measures in the HSA as summarized below. Information about the TISA processes is included where those processes are relevant to understanding components of the IRP Facilities in the HSA.

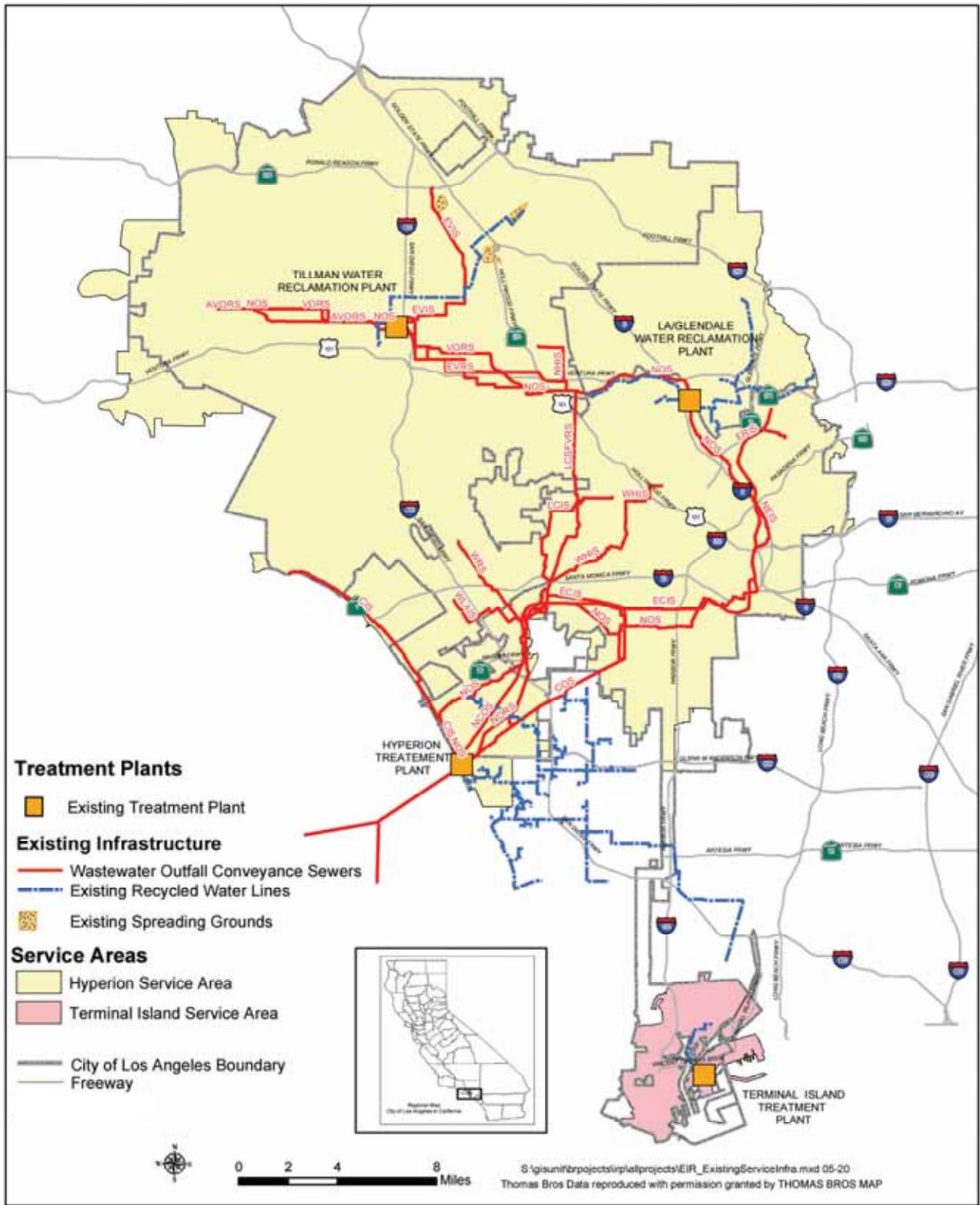
### **1.4.2.1 Wastewater System**

The City of Los Angeles manages its wastewater system in two service areas, the HSA and the TISA. The locations of these two service areas are shown in Figure 1-1. The HSA is the larger of the two areas (approximately 515 square miles) and encompasses most of the City of Los Angeles and some tributary areas. The City of Los Angeles makes up approximately 90 percent of the HSA. The TISA, which is located in the Los Angeles Harbor area, includes an approximately 18 square mile area.

The Hyperion Treatment Plant (Hyperion) is the wastewater treatment plant in the HSA with the greatest existing treatment capacity. The Donald C. Tillman Water Reclamation Plant (Tillman) in the Sepulveda Basin and LAG in northeast Los Angeles also treat wastewater generated in the HSA. The Terminal Island Treatment Plant (TITP) is the only treatment plant in the TISA.

The Tillman and LAG facilities are water reclamation plants that treat wastewater to tertiary levels and produce recycled water that meets Title 22 of the California Code of Regulations (CCR) §64431-§64444, §64670 et seq., and §64449 (Title 22). The TITP treats wastewater to tertiary levels and produces recycled water that meets Title 22 standards, but also applies advanced treatment for a portion of its flow. Table 1-2 provides additional information on treatment processes and effluent management for each of the City of Los Angeles treatment plants within the HSA and the TISA.

<b>Table 1-2. Treatment Plant Parameters</b> <i>Integrated Resources Plan EIR</i>				
<b>Plant Parameter</b>	<b>Hyperion</b>	<b>Tillman</b>	<b>LAG</b>	<b>TITP</b>
<b>Site Size (acres)</b>	<b>144</b>	<b>91<sup>a</sup></b>	<b>25</b>	<b>20</b>
<b>Treatment Processes</b>	<b>Preliminary Primary Secondary</b>	<b>Preliminary Primary Secondary Tertiary</b>	<b>Preliminary Primary Secondary Tertiary</b>	<b>Preliminary Primary Secondary Tertiary MF/RO</b>
Highest Treatment Level	Secondary	Tertiary	Tertiary	Tertiary/MF/RO
Effluent Quality	Secondary	Title 22	Title 22	Title 22
Biosolids Handling	Yes <sup>b</sup>	No	No	Yes <sup>b</sup>
Effluent Discharge Location <sup>c</sup>	Santa Monica Bay	Los Angeles River	Los Angeles River	Los Angeles Harbor
Maximum Monthly Flow	450 mgd	—	—	—
Capacity (ADWF)	413 mgd	64 mgd <sup>g</sup>	15 mgd <sup>g</sup>	30 mgd
Capacity (PWWF)	850 mgd	—	—	50 mgd
Current Flows (ADWF)	340 mgd <sup>d</sup>	51 mgd <sup>d</sup>	18 mgd <sup>d</sup>	18 mgd
Effluent Reused	34,350 afy <sup>e</sup>	28,500 afy	1,600 afy <sup>f</sup>	—
<p><sup>a</sup>Although the total plant site is 91 acres, 51 acres of the site (including the existing plant) are contained within a berm to prevent being affected by flooding as the plant is located within the Sepulveda flood control basin.</p> <p><sup>b</sup>Biosolids are reused beneficially through land application to agricultural land at the City of Los Angeles farm in Kern County.</p> <p><sup>c</sup>Hyperion discharges its effluent via a 5-mile outfall to the Santa Monica Bay. Tillman effluent is discharged to the Los Angeles River downstream of the Sepulveda Dam. LAG effluent is discharged to the Los Angeles River adjacent to the plant. TITP effluent is discharged to the Los Angeles Harbor via a 1,000-foot outfall.</p> <p><sup>d</sup>June 2001 – July 2002</p> <p><sup>e</sup>Secondary effluent is delivered to West Basin Municipal Water District for further treatment and reuse.</p> <p><sup>f</sup>City of Los Angeles portion only. The City of Glendale recycles an additional 1,800 to 2,400 afy.</p> <p><sup>g</sup>These capacities represent the assumed reduction on (i.e., derated) capacity attributable to the addition of nitrification-denitrification processes that are currently in progress. Tillman capacity prior to derating was 80 mgd and LAG capacity prior to derating was 20 mgd.</p> <p>afy      acre-feet per year  mgd      million gallons per day  MF/RO   microfiltration/reverse osmosis (also referred to as advanced treatment)  ADWF    average dry weather flow  PWWF    peak wet weather flow  LAG      Los Angeles-Glendale Water Reclamation Plant</p> <p>Source: City of Los Angeles, 2004</p>				



**Figure 1-1  
Existing Service Infrastructure**



The wastewater collection system of the City of Los Angeles comprises over 6,500 miles of sewers that convey wastewater from residences, businesses, and industrial facilities within the two service areas to one or more of the treatment and/or water reclamation plants. The collection system includes over 180 miles of major or large-diameter interceptor and outfall sewers that convey wastewater flow from the San Fernando Valley to Hyperion. Figure 1-1 depicts the major interceptor and outfall sewers in the HSA.

The biosolids collected at the two upstream plants, Tillman and LAG, are returned to the sewer collection system for conveyance to and treatment at Hyperion. Currently, Hyperion processes and handles approximately 650 wet tons per day (wtpd) of biosolids, which is just below the operational handling capacity of Hyperion for biosolids. Most of the biosolids processed at Hyperion are trucked to Kern County and beneficially reused for land application at the Green Acres farm owned by the City. A small amount of biosolids are taken to a composting facility in Griffith Park.

Additional detailed information on the existing treatment plants is in Volume 1 of the IRP Facilities Plan.

#### **1.4.2.2 Recycled Water System**

The City of Los Angeles Department of Water and Power (LADWP) uses recycled water to meet a portion of its overall water demand. Recycled water produced at Tillman, LAG, TITP, and Hyperion via the West Basin Municipal Water District is distributed to end users through recycled water distribution systems that extend from the treatment plants. The recycled water sources (treatment and reclamation plants) and the distribution systems from the plants are shown in Figure 1-1.

Approximately 64,450 acre-feet per year of recycled water are used for nonpotable purposes (irrigation and industrial uses). The amount of recycled water produced at the City of Los Angeles treatment plants and reused is shown in Table 1-2. Irrigation in Griffith Park and in the west side of the City of Los Angeles accounts for 1,950 acre-feet per year of recycled water reuse. Recreational and environmental uses in the Sepulveda Basin (Japanese Garden, Lake Balboa, and Wildlife Lake) use about 28,500 acre-feet per year of recycled water. The City of Los Angeles also sells approximately 34,000 acre-feet per year of secondary effluent from Hyperion to the West Basin Municipal Water District for further treatment to recycled water standards and subsequent distribution and reuse.

Additional detailed information regarding the existing recycled water system is located in Volume 2 of the IRP Facilities Plan.

#### **1.4.2.3 Runoff Management System and Measures**

The existing runoff management system of the City of Los Angeles includes over 1,200 miles of storm drains; 34,000 catch basins; 2,400 culverts; and 157 flood control basins. The storm drains convey dry and wet weather runoff directly to the ocean or to various inland streams and channels for conveyance to the ocean. (The terms runoff and stormwater are used interchangeably in this report.) The runoff management system also has approximately 2,000 outlets to the Los Angeles River and 315 outlets to Ballona Creek.



The runoff service area of the City of Los Angeles includes portions of the following four Los Angeles County watershed management areas:

- Los Angeles River Watershed Management Area
- Ballona Creek Watershed Management Area
- Santa Monica Bay Watershed Management Area
- Dominguez Channel Watershed Management Area

Additional detailed information regarding the existing runoff management system is located in Volume 3 of the IRP Facilities Plan.

## 1.5 Intended Uses of the Document

This EIR will be used by the Los Angeles City Council to select and approve a Project Alternative for implementation, and by other federal, state, or local agencies for actions or approvals that may be required. This section presents the process for environmental review and certification of the EIR, approval of the IRP, the required permits for approval, and the role of the State Water Resources Control Board (State Board) State Revolving Fund (SRF).

### 1.5.1 IRP Approval and Certification of EIR

This section presents the process for environmental review and certification of the EIR, including a discussion of the roles of the LADPW, the LADWP, and the Los Angeles City Council.

The EIR will be certified by the Los Angeles City Council. Approval of a project (i.e., an alternative or a component of an alternative) refers to the decision of either the LADWP, or the recommendation of the LADWP and approval by the Los Angeles City Council, to select and carry out an alternative or a component of an alternative. (Section 2.2 of this EIR summarizes the components that comprise the alternatives, with the exception of the No Project Alternative, analyzed in this EIR.)

For components related to wastewater systems, conveyance, and urban runoff, the Board of Public Works will have to concur with the staff recommendations. For components related to water recycling, water reuse, and groundwater recharge, the LADWP Board of Commissioners will have to concur with the staff recommendation. For project-level approval of each component of an alternative, the certified EIR will be the CEQA clearance for the approval of the individual component, regardless of the entity having jurisdiction over that component. For components analyzed at a program level in this EIR, supplemental environmental review will be conducted in the future. Approval of each component will require findings (CEQA Guidelines, Section 10591), a possible Statement of Overriding Considerations (CEQA Guidelines, Section 10593), and a Mitigation Monitoring and Reporting Program (CEQA Guidelines, Section 10597). A Preferred Alternative will be selected prior to certification of the Final EIR.

### 1.5.2 Permit Issuance and Approvals

In addition to the City of Los Angeles using this EIR to implement the IRP, the EIR may be used for other actions or permits required by other agencies to implement the

preferred Project Alternative, including approvals by Responsible or Trustee Agencies or other jurisdictions. Table 1-3 lists the actions likely to be required by other agencies to implement an alternative.

### 1.5.3 State Revolving Fund

The City of Los Angeles may pursue federal funding through the SRF from the State Board for one or more components of the preferred Project Alternative and, therefore, must comply with State Board SRF guidelines.

<b>Table 1-3. Agency Actions and Approvals</b> <i>Integrated Resources Plan EIR</i>	
<b>Federal Agencies</b>	
U.S. Army Corps of Engineers	Review of design and lease and permit approval for improvements related to Tillman in the Sepulveda Basin, applicable permits to cross under the LA River, as applicable.
U.S. Environmental Protection Agency	Project review under the Clean Water Act and other laws and regulations.
U.S. Fish and Wildlife Service	Project review under the Federal Endangered Species Act.
U.S. Bureau of Reclamation	Potential funding
<b>State Agencies</b>	
California Coastal Commission	Approval of Coastal Permits for components in the Coastal Zone.
California Department of Fish and Game	Approval of Streambed Alteration Agreements, as applicable.
California Department of Health Services	Approval of groundwater recharge.
California Department of Industrial Relations, Division of Occupational Safety and Health (Cal-OHSA)	Permits for excavation and mining, work protection oversight.
California Department of Transportation	Approval of temporary property transfer of California Department of Transportation (Caltrans) property during construction, granting of easements through Caltrans right-of-way, review of Project designs that could affect state highways.
California Department of Toxic Substances Control	Approval and oversight of hazardous waste remediation activities and work plans.
Regional Water Quality Control Board	Issuance of revised National Pollutant Discharge Elimination System (NPDES) Permits for construction and improved treatment plants, determination of compliance with Cease and Desist Order requirements (for NEIS II),
South Coast Air Quality Management District	Issuance of permits to construct and operate odor control facilities and equipment.
State Historic Preservation Office	Project review under CEQA and Section 106 of the National Historic Preservation Act, as applicable.
State Water Resources Control Board	Approval of SRF applications and verification of compliance with State Board environmental guidelines for the SRF, as applicable.

<b>Table 1-3. Agency Actions and Approvals</b> <i>Integrated Resources Plan EIR</i>	
<b>Regional and Local Agencies</b>	
City of Burbank	Approval of the Riverside West Shaft Site
City of Los Angeles, Bureau of Engineering	Approval of Coastal Permits under the applicable Local Coastal Program for components in the dual jurisdiction zone.
City of Los Angeles, Fire Department	Approval of design plans for the plant improvements for fire, life, and safety compliance.
Board of Police Commissioners	Issuance of permits for nighttime construction
City of Los Angeles, Department of Transportation	Approval of haul routes during construction, Work Area Traffic Control Plans, approval of street lane closures during construction.
Southern California Regional Rail Authority	Approval of license agreements or easements for railroad crossings.
County of Los Angeles Flood Control District	Various Permits related to drainages and facilities under their jurisdiction.
Los Angeles Metro	Approval of license agreements or easements for railroad crossings.
Department of Los Angeles County Beaches and Harbors	Approval of work that would occur in the jurisdiction of the Department of Los Angeles County Beaches and Harbors

The SRF Loan Program process is accomplished, in part, through compliance with CEQA. The SRF guidelines are intended to supplement CEQA Guidelines and provide specific requirements for environmental documents acceptable to the State Board when reviewing applications for wastewater treatment facility loans; they are not intended to supersede or replace CEQA Guidelines. The SRF Loan Program is partially funded by the United States (U.S.) Environmental Protection Agency (EPA) and, therefore, is subject to federal environmental regulations. To comply with the EPA-established specific “CEQA-plus” requirements in the Operating Agreement with the State Board for administering the SRF Loan Program, the environmental document must address:

- Federal Endangered Species Act
- Federal General Conformity Rule for the Federal Clean Air Act (CAA)
- National Historic Preservation Act
- Direct and Indirect Growth-Inducing Impacts

The SRF environmental review process requires a thorough analysis of the environmental impacts of reasonable Project Alternatives prior to selection of a specific Project Alternative. The SRF guidelines state that “environmental concerns should be considered on an equal basis with engineering feasibility, economics, and social considerations.” The SRF guidelines provide an outline that lists the project-specific information that must be disclosed, when applicable, in all environmental documents; the outline does not replace CEQA Guideline requirements and does not cover all necessary components of the documents (State Board, 2004).



The State Board specifies requirements that must be included in an EIR project description. See September 2004 Guidelines for more detailed outline (State Board, 2004). The specific requirements and where they are addressed in this EIR are provided below:

- **Project Objectives that Qualify the Project for SRF Funding.** The objectives of the IRP that qualify for SRF funding are listed and described in Section 1.
- **How Objectives will be Accomplished.** Explanations of how the objectives of the IRP will be accomplished are included at the beginning of the description of each Project Alternative in Section 2.3.
- **Existing Facilities.** Existing wastewater, recycled water, and runoff infrastructure are described in Section 1.
- **New Facilities.** New facilities and improvements to existing facilities proposed as part of the IRP are described in Sections 2.2 and 2.3.
- **Project Approvals.** The anticipated project approvals from planning and regulatory agencies with permit or funding authority for the Proposed Project are included in Section 1.
- **Project Location.** The locations of the Project Alternatives and components are described in Sections 2.1, 2.2, and 2.3.

This EIR has been prepared in accordance with the State Board *Environmental Review Process Guidelines for State Revolving Fund Applicants* (State Board, 2004).

## 1.6 Public Outreach

The City of Los Angeles has undertaken an extensive public outreach and coordination effort prior to and during the preparation of this EIR in support of the IRP Facilities Plan process and the Draft EIR. This section summarizes the public outreach efforts conducted for the EIR process, as required by CEQA, and the extensive public outreach efforts undertaken by the City of Los Angeles to obtain public and stakeholder input during the IRP planning process (described in Section 1.6.2 and in Section 2.3.1). Supporting documents for the public outreach associated with the Draft EIR and the IRP Facilities Plan are in Appendix A. Additional information on the public outreach and Steering Committee input to the planning process is in the IRP Facilities Plan (City of Los Angeles, 2004).

### 1.6.1 CEQA Notices and Scoping Meetings

Public outreach and notification occurred during the preparation of this Draft EIR, including public notification and meetings.

#### 1.6.1.1 Notice of Preparation

Subsequent to the completion of the IRP Facilities Plan, the City of Los Angeles determined that implementing the IRP required environmental review in accordance with CEQA and that an EIR is the appropriate level of environmental documentation under CEQA. As required by Section 15082 of the CEQA Guidelines, and to help



determine the scope and content of the EIR, the City of Los Angeles prepared and circulated (from July 20, 2004, through August 31, 2004) a Notice of Preparation (NOP) for this EIR for agency and public review.

The NOP, which is in Appendix A, was distributed via U.S. mail and e-mail on July 19, 2004, to 959 persons or organizations (182 to City of Los Angeles administrative personnel or offices, 72 to governmental agencies [sent via certified mail], and the remainder to other interested organizations or persons). The NOP recipients included Responsible Agencies, Trustee Agencies, the Governor's Office of Planning and Research, the State Board Environmental Services Unit (in compliance with SRF guidelines), adjacent jurisdictions, and state and federal agencies that could be involved in approving or funding the Project Alternative selected for implementation. A notice announcing the availability of the NOP also was published in the *Los Angeles Times* on July 29, 2004.

### **1.6.1.2 Public Scoping**

As allowed for under Section 15083 of the CEQA Guidelines, a scoping meeting was held in July 2004 to allow agencies and the public to provide comment on the scope and content of the EIR. Two scoping meetings were scheduled. Six persons attended, but only one meeting was attended by the public or agencies. The scoping meeting was held at the offices of the City of Los Angeles, Bureau of Sanitation, at 2714 Media Center Drive in Los Angeles. The locations, dates, and times of the scoping meetings were announced in the NOP.

At the scoping meeting, which was attended by six members of the public, the City of Los Angeles presented an overview of the Project Alternatives to be analyzed in the EIR, a description of the environmental process under CEQA, and the anticipated environmental impacts of the IRP. A court reporter documented the scoping meeting.

Members of the public commented on the following areas: odors, faults, the diversion of runoff from bodies of water that would preclude future riparian or wetlands projects, migratory bird habitat along the Los Angeles River, soft bottom habitat along the LA River, levee effects near Tillman, the level of treatment at Tillman, and the amount of dry and wet weather runoff treated.

### **1.6.1.3 Draft EIR Notification**

This Draft EIR is being circulated for public review and comment in accordance with Sections 15087 and 15105 of the CEQA Guidelines. The public review period will be 90 days. During the review period, comments from the general public, organizations, and Responsible or Trustee Agencies regarding the information in the Draft EIR can be submitted to the Lead Agency at the following address:

Mr. Adel Hagekhalil, Manager  
City of Los Angeles  
Public Works, Bureau of Sanitation  
Wastewater Engineering Services Division  
2714 Media Center Drive  
Los Angeles, CA 90065  
Fax: (323) 342-6210



A Notice of Availability (NOA) of this Draft EIR was sent to persons and organizations that have expressed an interest in the EIR and to agencies responsible for reviewing the Draft EIR. In addition, a notice was published in newspapers of general distribution and the Draft EIR was distributed to local libraries (see Appendix A for a list of newspapers in which the Draft EIR notice was published and the libraries at which copies of the draft EIR are available). In addition, the Draft EIR was sent to governmental agencies, including the State Board, the Governor's Office of Planning and Research, applicable Responsible and Trustee agencies, and other jurisdictions.

This Draft EIR also has been posted to the IRP website and is available for download and review at:

[www.lacity.org/san/irp](http://www.lacity.org/san/irp)

#### **1.6.1.4 Public Meeting**

As allowed for under Section 15087 of the CEQA Guidelines, at least one public hearing will be held on this Draft EIR during the 90-day public review period. Public comments on the scope and content of the Draft EIR can be presented at the public hearing or submitted in writing to the Lead Agency, as described above.

Upon completion of the review period, the City of Los Angeles will prepare a Final EIR that will include responses to comments on the Draft EIR.

#### **1.6.2 EIR Information Sessions**

In addition to the public outreach efforts undertaken for the EIR, as required under CEQA (NOP, scoping meeting, NOA, Draft EIR public review, and public hearing), as described above, the City of Los Angeles conducted extensive coordination to inform the public of the Project Alternatives under consideration and to coordinate with other agencies. Appendix A contains a list of parties contacted and meetings held to inform interested parties about the IRP during the preparation of the EIR.

In addition to the information sessions conducted during the EIR preparation, the City of Los Angeles actively involved the public in development of the IRP and established a Steering Group of community leaders, interested stakeholders, and the general public to advise on the development of the Project Alternatives. As part of the development process of the IRP and Project Alternatives, the Steering Group played a key role in the evaluation process of preliminary Project Alternatives that resulted in the four Project Alternatives described in Section 2 of this Draft EIR.

The City of Los Angeles used an iterative approach to develop Project Alternatives (described in Section 2.3) to meet the multiple objectives of the IRP (described above). The City, in association with the Steering Group, developed preliminary Project Alternatives that addressed future (2020) wastewater, recycled water, and runoff needs, but that also had allowed for application of various criteria to accommodate changes and unanticipated conditions that could be encountered during implementation of the selected Project Alternative. The Steering Group participated in ranking the preliminary Alternatives.



In addition to the Alternatives evaluated in this EIR, the City of Los Angeles and Steering Group developed various pilot projects or studies (referred to as Leadership Projects) that could be implemented to define further the components assessed in this EIR. During a workshop, the Steering Group identified numerous Leadership Projects that would facilitate implementation of the IRP. These Leadership Projects would provide new partnership opportunities between the City of Los Angeles and communities for achieving the objectives of the IRP. The vision of the Steering Group for Leadership Projects is:

*Leadership projects will inspire and engage our community to embrace sustainable practices of water resource management. Leadership projects should be highly visible and innovative, creating dramatic improvements in the quality of our water resources, open space, and economic base. Developing and implementing these projects should exemplify a new way of business for public works projects that is coordinated and partnership-based across community, city, and regional interests.*

Some of the Leadership Projects would allow the City to apply various criteria (technological, operability, results verification, scale-up effect, and public acceptance) to confirm whether selected demonstration projects merited further implementation.

Because the Leadership Projects are studies or demonstration projects that may or may not provide information that can be applied at the larger IRP scale, they are independent of the Proposed Project Alternatives and will be evaluated under separate environmental documentation, if applicable. Appendix A contains the current list of Leadership Projects.

## 1.7 Other Studies and Evaluations

A team of consultants, which included members of the University of Southern California, Center for Sustainable Cities, and the University of California at Los Angeles, Institute of the Environment, prepared a sustainability analysis focused in the IRP Facilities Plan. The purpose of the sustainability analysis was to evaluate the IRP Alternatives outside the context of specific CEQA review of the Proposed Alternatives. Because the sustainability analysis is intended to provide a relative overview evaluation of the Project Alternatives using a broad set of criteria that may not meet the CEQA criteria for establishing thresholds of significance, the environmental impact discussions in the sustainability report may not reflect the level of detail or evaluation protocols typical of environmental analyses developed under CEQA. Although the sustainability analysis includes some environmental resource areas as indicators for achieving sustainability, that assessment is not intended to provide the more rigorous evaluation of the Proposed Project Alternatives that has been conducted in this Draft EIR. For that reason, the Draft EIR was prepared independently of the sustainability report and the findings of the sustainability report are not relied upon for the analysis in this Draft EIR. Although the sustainability analysis may contain discussions that are inconsistent with this Draft EIR, the analyses in this EIR and the Administrative Record for the EIR have been developed in accordance with CEQA and form the basis for significance determinations in the environmental impact issue areas discussed in Section 3.