



COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
www.ladpw.org

DONALD L. WOLFE, Director

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

IN REPLY PLEASE
REFER TO FILE: WM-6

May 25, 2006

TO: Each Supervisor
FROM: Donald L. Wolfe *DW*
Director of Public Works

SAN GABRIEL RIVER CORRIDOR MASTER PLAN RESPONSE TO COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

The San Gabriel River Master Plan and its Program Environmental Impact Report (PEIR) are scheduled to be considered for adoption by your Board on June 13, 2006.

On March 3, 2005, a draft of the PEIR was released for public review. During the 60-day public review period, comments were received from two private residents and 22 public agencies and organizations. Public Works prepared written responses to these comments and included them in the final PEIR. Pursuant to Public Resources Code, Section 21092.5, we provided copies of the responses to comments and the final PEIR to all commenting agencies. Attached for your reference are the comment letters and responses to these comments.

If you have any questions, please contact me or your staff may contact Mark Pestrella of our Watershed Management Division at (626) 458-4300 or mpestrel@ladpw.org.

mg
5/25
DB:sv

P:\wmpub\SGR Watershed\Danny B\SGR Master Plan\SGRMP EIR Responses Letter_Board.doc\06237

Attach.

cc: Chief Administrative Office
Executive Office

Appendix F

Comments and Responses

Table F-1 lists the agencies and organizations who provided written comments on the Draft Program EIR for the San Gabriel River Corridor Master Plan. This section presents the comments followed by the County's responses to those comments.

Table F-1
List of Comment Letters

Letter Number	Organization	Commentor
1	California Department of Conservation Division of Oil, Gas, & Geothermal Resources	Mr. Paul Frost, Associate Oil & Gas Engineer
2	California Department of Fish and Game	Ms. Leslee Newton-Reed, Habitat Conservation Planning Mr. Donald R. Chadwick, Habitat Conservation Supervisor
3	California Department of Transportation	Mr. Robert Joseph, Chief IGR/Community Planning Branch
4	Central and West Basin Municipal Water Districts	Ms. Jennifer Bender, Water Quality Scientist
5	City of Cerritos	Mr. Torrey N. Contreras, Director of Community Development
6	City of Santa Fe Springs	Mr. Robert G. Orpin, Director of Planning and Development
7	City of Seal Beach	Mr. Paul Yost, Mayor Mr. Phil Ladner, Chairman Planning Commission Mr. Mario Voce, Chairman Environmental Quality Control Board
8	County of Orange Resources & Development Management Department	Mr. Ronald L. Tippetts, Chief, Environmental Planning Division
9	Fly Fishers Club of Orange County	Mr. David M. Long
10	Law Offices of Susan M. Trager	Ms. Susan M. Trager
11	Main San Gabriel Basin Watermaster	Ms. Carol Thomas Williams, Executive Officer
12	Metropolitan Water District of Southern California	Ms. Laura J. Simonek, Manager, Environmental Planning Team
13	Puente Hills Landfill Native Habitat Preservation Authority	Ms. Andrea Gullo, Executive Director
14	San Gabriel River Water Committee	Mr. Don Berry, Administrator
15	San Gabriel River Watermaster	Mr. Richard A. Rhone

Appendix F – Comments and Responses

**Table F-1 (Continued)
List of Comment Letters**

Letter Number	Organization	Commentor
16	San Gabriel Valley Mosquito and Vector Control District	Mr. Steve West, District Manager Mr. Mino Madon, Scientific Technical Services Director, Greater Los Angeles Vector Control District Mr. Charles Myers, Supervisor, California Department of Health Services, Vector-Borne Disease Section
17	Sanitation Districts of Los Angeles County	Mr. Christian Alarcon, Civil Engineer, Monitoring Section
18	Southern California Association of Governments	Ms. April Grayson, Associate Regional Planner, Intergovernmental Review
19	Southern California Edison	Ms. Maryann Reyes, Director of Public Affairs
20	Southern Council of Conservation Clubs, Inc.	President
21	United Rock Products	Mr. Ken Barker, Environmental & Regulatory Affairs Manager
22	Vulcan Materials Company Western Division	Mr. Steve C. Cortner, Vice President
23	--	Mr. Robert Dale
24	--	Mr. Lester Kau

WMD
337

DEPARTMENT OF CONSERVATION
STATE OF CALIFORNIA



Comment Letter No. 1

April 4, 2005

DIVISION OF OIL,
GAS, & GEOTHERMAL
RESOURCES

5816 CORPORATE AVE.
SUITE 200
CYPRESS
CALIFORNIA
90630-4731

PHONE
714/816-6847

FAX
714/816-6853

INTERNET
consrv.ca.gov

ARNOLD
SCHWARZENEGGER
GOVERNOR

Mr. Marty Moreno
County of Los Angeles, Department of Public Works
P.O. Box 1460
Alhambra, California 91802-1460

Subject: Notice of Preparation of Draft Environmental Impact Report for
the San Gabriel River Corridor Master Plan, SCH #2003041187

Dear Mr. Moreno:

The Department of Conservation's (Department) Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California.

1-1

The proposed project is located within the administrative boundaries of several oil and gas field. There are numerous wells within the project boundaries. The wells are identified in Division records and on Division maps. The Division recommends that all wells within or in close proximity to project boundaries be accurately plotted on future project maps.

1-2

Building over or in the proximity of plugged and abandoned wells should be avoided if at all possible. If this is not possible, it may be necessary to plug or re-plug wells to current Division specifications. Also, the State Oil and Gas Supervisor is authorized to order the reabandonment of previously plugged and abandoned wells when construction over or in the proximity of wells could result in a hazard (Section 3208.1 of the Public Resources Code). If reabandonment is necessary, the cost of operations is the responsibility of the owner of the property upon which the structure will be located. Finally, if construction over an abandoned well is unavoidable an adequate gas venting system should be placed over the well.

Furthermore, if any plugged and abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the Division's district office must be contacted to obtain information on the requirements for and approval to perform remedial operations.

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2005 APR 20 PM 2:02

MAIL CENTER
900 S. FREMONT AVE.

Mr. Marty Moreno, County of Los Angeles, Department of Public Works

April 4, 2005

Page 2

1-2
(cont'd)

To ensure proper review of building projects, the Division has published an informational packet entitled, "Construction Project Site Review and Well Abandonment Procedure" that outlines the information a project developer must submit to the Division for review. Developers should contact the Division's Cypress district office for a copy of the site-review packet. The local planning department should verify that final building plans have undergone Division review prior to the start of construction.

Thank you for the opportunity to comment on the Notice of Preparation for the Draft Environmental Impact Report. If you have questions on our comments, or require technical assistance or information, please call me at the Cypress district office: 5816 Corporate Avenue, Suite 200, Cypress, CA 90630-4731; phone (714) 816-6847.

Sincerely,



Paul Frost
Associate Oil & Gas Engineer



DEPARTMENT OF FISH AND GAME

http://www.dfg.ca.gov
 4949 Viewridge Avenue
 San Diego, CA 92123
 (858) 467-4201

Comment Letter No. 2



April 22, 2005

Mr. Marty Moreno
 County of Los Angeles Department of Public Works
 Watershed Management Division
 P.O. Box 1460
 Alhambra, CA 91802-1460

RECEIVED

APR 22 2005

STATE CLEARING HOUSE

clear
 4-18-05
 late

**Comments on the Draft Program Environmental Impact Report for the San Gabriel River
 Corridor Master Plan, Orange County (SCH# 2003041187)**

Dear Mr. Moreno:

The Department of Fish and Game (Department) has reviewed the above-referenced Environmental Impact Report (EIR). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Section 15386) and pursuant to our authority as a Responsible Agency under CEQA Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code Section 2050 et seq.) and Fish and Game Code Section 1600 et seq. The Department also administers the Natural Community Conservation Planning Program (NCCP).

The proposed project area is a 1-mile wide corridor along 58 river miles on the San Gabriel River from its headwaters in the San Gabriel Mountains to its terminus at the Pacific Ocean between Long Beach and Seal Beach. The project area includes 19 cities as well as unincorporated areas of Los Angeles and Orange Counties. The San Gabriel River Corridor Master Plan is a consensus-based document that recognizes and addresses a renewed interest in recreation, open space, and habitat, while also seeking to enhance and maintain flood protection, water conservation benefits, along with existing water rights. The Master Plan identifies over 130 projects along the San Gabriel River that are visions of cities and other stakeholder organizations and incorporate one or more of the Master Plan goals. The Master Plan provides policies and guidelines that help coordinate these independent projects and to facilitate the achievement of the shared vision and goals for the San Gabriel River corridor. This Program EIR is intended to be a model to guide further project-level CEQA review and streamline the environmental review and documentation for Steering Committee members proposing projects in the river corridor.

The Department offers the following preliminary comments and recommendations; we reserve the right to make further comments on second-tier CEQA documents.

2-1

1. The Department recommends the following revision to Construction impacts on nesting

Mr. Marty Moreno

April 22, 2005

Page 2

raptors, CD-B4, on Table 1-3, Summary of Concept Design Study Impacts and Mitigation Measures:

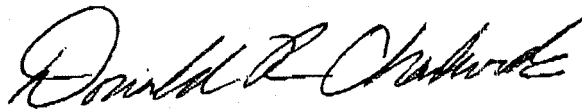
CD-B4 Nesting Raptors – The following mitigation measure shall be implemented to avoid raptor impacts:

~~No earlier than 45 days and no later than 20 days~~ One week prior to construction or ~~grading/site preparation and clearing~~ activities that would occur during the nesting/breeding season of native bird species potentially nesting on the site (typically February through August), a survey shall be conducted by a qualified biologist to determine if active nests of bird species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code are present ~~in the construction zone or within 100 feet (200 feet for raptors)~~ within 300 feet (within 500 feet for raptors) of the construction zone. Construction can proceed if no active ~~raptor~~ avian nests are located during this survey. If an active nest is found during the survey, a 500-foot (this distance may vary depending on the bird species and construction activity, as determined by the biologist) fence barrier shall be erected around the nest site. Clearing and construction within the fenced area shall be postponed or halted, at the discretion of the biologist, until the nest is vacated and juveniles have fledged, as determined by the biologist, and there is no evidence of a second attempt at nesting. The biologist shall serve as a construction monitor during those periods when construction activities may occur near active nests to ensure that no inadvertent impacts on these nests occur. Results of the raptor survey and any subsequent monitoring shall be provided to the CDFG and any other appropriate agency.

2-1
(Cont'd)

Thank you for the opportunity to comment on the DEIR. The Department finds that the project would be de minimis in its effects on fish and wildlife per section 711.4 of the California Fish and Game Code. Questions regarding this letter and further coordination on these issues should be directed to Leslee Newton-Reed at (858) 467-4281.

Sincerely,



Donald R. Chadwick
Habitat Conservation Supervisor

cc: State Clearing House

LNR:lnr
San Gabriel River Corridor Master Plan DEIR



Arnold
Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Sean Walsh
Director

April 25, 2005

Marty Moreno
Los Angeles County Department of Public Works
P.O. Box 1460
Alhambra, CA 91802-1460

Subject: San Gabriel River Corridor Master Plan
SCH#: 2003041187

Dear Marty Moreno:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on April 18, 2005. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2003041187) when contacting this office.

Sincerely,

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures
cc: Resources Agency

DEPARTMENT OF TRANSPORTATION

District 12
3337 Michelson Drive, Suite 380
Irvine, CA 92612-8894
Tel: (949) 2724-2267
Fax: (949) 724-2592

Comment Letter No. 3



*Flex your power!
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FAX & MAIL

April 13, 2005

Mr. Martin Moreno
County of Los Angeles,
Watershed Management Division
P.O. Box 1460
Alhambra, California 91802-1460

File: IGR/CEQA
SCH#: 2003041187
Log #: 1248-A
SR #: SR-1, I-405, I-605

Subject: San Gabriel River Corridor Master Plan

Dear Mr. Moreno,

Thank you for the opportunity to review and comment on the **Draft Program Environmental Impact Report for the San Gabriel River Corridor Master Plan Project**. This Master plan proposes an integrated watershed system achieving various goals and providing a wide variety of activities including open space and habitat protection, water conservation benefits, flood safety, water supply and water quality, and economic development. The nearest state facilities to the project site Interstates 405, 605 and SR-1.

Caltrans District 12 status is a reviewing agency on this project and has the following comments:

- 3-1** 1. Please refer to our comments in our previous correspondence dated May 23, 2003 (copy attached). In the event of any activity in Caltrans' right-of-way, an encroachment permit will be required. Applicants are required to plan for sufficient permit processing time, which may include engineering studies and environmental documentation.
- 3-2** Please continue to keep us informed of this project and any future developments, which could potentially impact the transportation facilities. If you have any questions or need to contact us, please do not hesitate to call Maryam Molavi at (949) 724-2267.

Sincerely,

ROBERT F. JOSEPH, Chief
IGR/Community Planning Branch

C: Terry Roberts, Office of Planning and Research
Terri Pencovic, Caltrans HQ IGR/Community Planning
Gale McIntyre, Deputy District Director
Isaac Alonso Rice, Traffic Operations

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Comment Letter No. 4**Rydman, Rama**

From: Jennifer Bender [jenniferb@wcbwater.org]
Sent: Wednesday, May 04, 2005 11:41 AM
To: Rydman, Rama
Subject: Additional Comments to the SGR Master Plan

Rama,

Apologize for not attending the meeting Monday - I myself am wrapped up in Prop 50 and was just too swamped to make it.

Although I submitted a few comments last December to the Master Plan, I took another read through and would like to add the following comments. I'm not sure if you are the specific person to send these to, but I thought you could at least forward them on if you weren't.

- 4-1** | 1. Overall comment - sometimes the West Coast Basin is referred to as just the West Basin (referring to groundwater basins). It should be consistently called the West Coast Basin throughout the entire document.
- 4-2** | 2. Overall comment - sometimes the Metropolitan Water District of Southern California has the word "Southern" left out of their name in the text. They are truly called the Metropolitan Water District of Southern California. It should be consistent throughout.
- 4-3** | 3. Overall comment - sometimes even after the phrase "Water Reclamation Plant" has been defined and the acronym used, the phrase is continually used in the document rather than the acronym. It should be one or the other.
- 4-4** | 4. Overall comment - sometimes the Sanitation Districts of Los Angeles County are mis-named in the text as County Sanitation Districts, or Sanitation District (singular). Their name "Sanitation Districts of Los Angeles County" should be consistent throughout.
- 4-5** | 5. Overall comment for Chapters 2 and 3 - when discussing water supply and adjudication rights on the San Gabriel River, there are points of confusion. In some places it describes how the River is the primary source of local water supply in Southern California (ignoring the groundwater basins all together). In other places it talks about how every single drop of water in the River is adjudicated and/or percolated into the ground (which is not evenly distributed into every groundwater basin). Also, it mentions that the River carries a lot of reclaimed water and rainfall to waste to the ocean. I don't get a consistent message on how the River in fact contributes to all of the underlying groundwater basins, how adjudication rights are impacted by the excess recycled water and rainfall in the river, and how it can all percolate when it's consistently flowing toward the sea. Perhaps some clarification may help?
- 4-6** | 6. Overall comment for Chapters 2 and 3 - when discussing water supply, the sections frequently itemize local water supply sources as imported, reclaimed, and rainfall. This list leaves off groundwater, which is a crucial source for water supply. Most rainfall is not captured and added into the groundwater basins, and even if it was, it's only a small component of the groundwater aquifer as a source in and of itself. It might be good to clarify the role of rainfall to groundwater basins, and use the more appropriate term of groundwater as a local water supply source.
- 4-7** | 7. Page 3-10. Last sentence of the only paragraph on the page. It should read "The Central Basin Watermaster and West Coast Basin Watermaster have the same....."
- 4-8** | 8. Page 2-34. Under the subsection "Central and West Basins" (which will be changed to West Coast Basin per comment #1). The third sentence should read "The Water Replenishment District (WRD) is responsible for recharging water to the basins"

4-9 | 9. Page 2-38. Under the subsection "Imported Water", the Delta is improperly referred to as the San Joachin, when it should be San Joaquin.

Thank you very much. Please let me know if you have any questions,

Jennifer Bender

Water Quality Scientist

Central and West Basin Municipal Water Districts

17140 South Avalon Blvd, Suite 210

Carson, CA 90746

310-660-6253 (office)

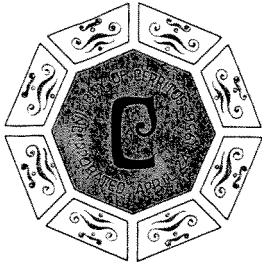
213-200-7233 (cell)

310-217-2414 (fax)

jenniferb@wcbwater.org

www.centralbasin.org

www.westbasin.org



CITY OF CERRITOS

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May 2, 2005

Mr. Marty Moreno
County of Los Angeles Department of Public Works
Watershed Management Division
P.O. Box 1460
Alhambra, CA 91802-1460

Comment Letter No. 5

Subject: **DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT – SAN GABRIEL RIVER CORRIDOR MASTER PLAN**

Dear Mr. Moreno:

Thank you for providing the City of Cerritos with an opportunity to review and comment on the Draft Program Environmental Impact Report for the San Gabriel River Corridor Master Plan ("Master Plan"). City staff has reviewed the Draft Program EIR and the proposed Master Plan and has determined that the Master Plan's five proposed Concept Design Studies would not generate any significant impacts to the City of Cerritos. However, the City is concerned about potential impacts resulting from the Master Plan's proposed River Enhancement Concepts.

5-1 While the proposed San Gabriel River Corridor Master Plan is generally consistent with the goals and policies of the City of Cerritos General Plan Open Space/Recreation Element, any proposal for increasing the amount of existing recreational or open space adjacent to the San Gabriel River within the City of Cerritos would be in direct conflict with the Cerritos General Plan Land Use Element. The San Gabriel River Corridor Master Plan cites the acquisition of additional land adjacent to the River for recreation purposes as a long-term goal. The City of Cerritos already maintains a plentiful amount of recreational open space along the River via its award-winning parks and recreational facilities, including Iron-Wood Nine Golf Course, Westgate Park, and Liberty Park, which has been recently renovated to meet the objectives described in the Liberty Park Improvement Project section of the Master Plan.

In addition to these facilities, there exist several residential and commercial developments adjacent to the San Gabriel River that have been developed in a manner consistent with the Cerritos General Plan and with the high-quality design standards required by the Cerritos Municipal Code. Therefore, the City of Cerritos will oppose the conversion of existing residential and commercial developments along the River to other uses, given their importance to the wellbeing of the City and the fact that the City already maintains more than a sufficient amount of recreational open space in the River Corridor area.


5-2 Another long-term project prescribed by the Master Plan is the installation of gateways to visually identify the River and its connection to adjacent cities. As this proposed project promotes aesthetic enhancements, the City of Cerritos would support this project in concept. However, all improvements will be required to comply with the Cerritos Municipal

5-2 | Code and are subject to the review and approval of the Cerritos City Council and respective
(Cont'd) Commission prior to their final design and installation.

5-3 | According to the Master Plan, the City of Cerritos is located in a portion of the River Corridor that has "very low potential" for the conversion of the existing concrete channel into a more natural habitat setting. It is our expectation that, should such a project be proposed in the future, a separate and more comprehensive Environmental Impact Report will be prepared. The existing Draft Program EIR lacks in detail with respect to this proposed undertaking.

5-4 | The City of Cerritos would like to receive any future updates regarding this project. We look forward to working with the County of Los Angeles Department of Public Works in the future. Thank you again for including the City of Cerritos in your planning and review process. Should you have any questions, please do not hesitate to contact me at (562) 916-1201.

Sincerely,



Torrey N. Contreras
Director of Community Development

cc Art Gallucci, City Manager
Vince Brar, Assistant City Manager/Public Works
Mike O'Grady, Environmental Services Manager
Robert A. Lopez, Associate Planner



May 13, 2005

Comment Letter No. 6

Rama Rydman
 Watershed Management Division
 County of Los Angeles Dept. of Public Works
 900 South Fremont Avenue, 11th Floor
 Alhambra, CA 91803

Subject: Comments on the Draft Program EIR for the San Gabriel River Corridor Master Plan, SCH No. 2003041187

Dear Rama:

On behalf of the City of Santa Fe Springs, please consider the following comments:

Transportation:

6-1

The trails along and connecting to the San Gabriel River are a key part of the regional transportation system in providing alternatives to vehicles. The improvements and impacts to the trail/bikeway system should be addressed. The Los Angeles County Metropolitan Transportation Authority ("MTA") is currently updating their countywide Bicycle Transportation Strategic Plan ("BTSP") and considers the San Gabriel River trail as a major regional transportation spine. Therefore the MTA BTSP and related bicycle information should be incorporated. An example of minimum information that should be incorporated is all existing and proposed bikeway connections to the SGR trails.

Water:

EIR Section 4.6 – Hydrology and Water Quality, Page 4.6-23

6-2

1. A statement is made in the second paragraph that states "The major point source dischargers that are potentially contributing to these water quality impairments include: five WRP's located on the River or its tributaries (Table 4.6- 4); including facilities (the Alimitos and Haynes generating stations and Santa Fe Springs Refinery);"

Comment: There is no refinery in the City of Santa Fe Springs named "Santa Fe Springs refinery." All previously operated refineries in Santa Fe Springs have not been in operation for over ten years. The refineries have been removed with soils remediated to state standards, except the former Powerine refinery, which is

San Gabriel River Master Plan EIR Comments

May 13, 2005

Page 2 of 2

6-2
(Cont'd)

currently being removed and remediated. The former Powerine refinery has approval of an interim use for wastewater treatment, but our understanding is that it does not discharge into the storm drain system.

- 2. The last sentence states " These future TMDL's will most likely include requirements for municipalities to reduce pollutant loads from stormwater runoff."

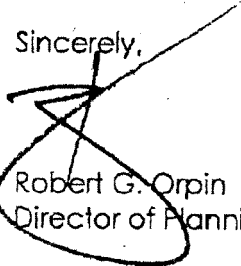
6-3

Comment: We feel that the statement should be changed to not single out municipalities as the only entity that will most likely be required to implement Best Management Practices to comply with future TDML's. We feel that point sources and non-point sources that discharge to the target water body should be responsible for the implementation of TDML's and should not exclude Federal and State agencies.

The EIR and the Master Plan should consider and clearly explain the responsibilities that Federal, State, and Local agencies will share in the implementation of present and future Total Maximum Daily Loads (TMDL's).

We appreciate the opportunity to comment on the EIR and Master Plan and look forward to the implementation of the common visions developed by the Master Plan.

Sincerely,



Robert G. Orpin
Director of Planning and Development

Cc: Fred Latham, City Manager; Ana Alvarez; Don Jensen; Marina Sueiro; Steve Masura; Tony Olmos

City of Seal Beach



CITY HALL 211 EIGHTH STREET
SEAL BEACH, CALIFORNIA 90740
(562) 431-2527 • www.ci.seal-beach.ca.us

April 25, 2005

du/wmd

Comment Letter No. 7

Mr. Marty Moreno
County of Los Angeles Department of Public Works
Watershed Management Division
P. O. Box 1460
Alhambra, CA 91802-1460

Dear Mr. Moreno:

SUBJECT: CITY OF SEAL BEACH COMMENTS RE: "DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT - SAN GABRIEL RIVER CORRIDOR MASTER PLAN"

The City Council, Planning Commission and Environmental Quality Board of the City of Seal Beach have reviewed the "*Draft Program Environmental Impact Report - San Gabriel River Corridor Master Plan*" ("DPEIR"). Our staff has been working closely with the Department of Public Works and the San Gabriel Rivers and Mountains Conservancy for several years in a cooperative manner to ensure that the concerns, goals and aspirations of Seal Beach are properly set forth both within the "San Gabriel River Corridor Master Plan" ("Master Plan") and the subject DPEIR. Our staff has also reviewed the various components of the DPEIR to ensure that the document accurately reflects, at the program level of environmental analysis, the anticipated beneficial and adverse impacts of the adoption of the Master Plan and this DPEIR both to our community and to other areas of a local concern to our community.

7-1 The document provides an adequate level of environmental analysis of the beneficial, potentially adverse, and neutral impacts on the environment of the proposed Master Plan. The areas of environmental concern reviewed in the DPEIR do not fully include all areas of concern as was addressed in our letter of May 28, 2003 on the "Notice of Preparation" for this DPEIR. It was requested at that time that the "*Program EIR should contain evaluations as to how the Master Plan will comply with and be consistent with the NPDES permit requirements of both of the Regional Water Quality Control Boards.*" In our review of the areas of environmental concern discussed within the DPEIR, this does not appear to have been accomplished.

7-1
(Cont'd)

The San Gabriel River watershed is within the boundaries of the Los Angeles and Santa Ana Regional Water Quality Control Boards, and the Program EIR should contain evaluations as to how the Master Plan will comply with and be consistent with the NPDES permit requirements of both of the Regional Water Quality Control Boards. In accordance with Santa Ana Regional Water Quality Control Board permit requirements, local agencies within Orange County are also required to evaluate the following areas of concern in a CEQA document relative to “Hydrology” or “Utilities and Service Systems” that have not been evaluated in the DPEIR document:

7-2

“Potentially impact stormwater runoff from construction activities?”

Potentially impact stormwater runoff from post-construction activities?

Result in a potential for discharge of stormwater pollutants from areas of material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas, loading docks or other outdoor work areas?

Result in the potential for discharge of stormwater to affect the beneficial uses of receiving waters?

Create the potential for significant changes in the flow velocity or volume of stormwater runoff to cause environmental harm?

Create significant increases in erosion of the project site or surrounding areas?”

Would the project include a new or retrofitted storm water treatment control Best Management Practice (BMP), (e.g. water quality treatment basin, constructed treatment wetlands), the operation of which could result in significant environmental effects (e.g. increased vectors and odors)?

7-3

The City also requested in our May 28, 2003 comment letter on the “Notice of Preparation” that the Program EIR evaluate programs and methods of reducing solid waste transport along the River to the Pacific Ocean within the analysis. The impacts upon the City of Seal Beach and also Long Beach are substantial, and create adverse environmental impacts due to wash-up of solid waste materials on the local beaches. During the first three months of 2005 Seal Beach removed in excess of 540 tons of debris for our beaches that had been washed down the San Gabriel River during the storm season. The loss in beach availability, and the resulting adverse economic impacts of decreased visitors to the local beaches should be considered, evaluated, and mitigated within the Program EIR. One methodology of dealing with solid waste within the River is an evaluation of strategically placed debris booms along the length of the River or other appropriate best management practices to trap floating material and intercept that material from reaching the Ocean at various locations upstream. This type of program should specifically be evaluated within the Draft Program EIR.

7-4

Further, several of the proposed “Mitigation Program Measures” require language clarification as indicated below:

Cultural Resources:

7-4
(Cont'd)

- MP-C1** – Item 3 should be revised to require all field reconnaissance activities to also include the presence of a “qualified Native American Monitor”.
- Geology and Soils:
 - MP-G1** – the last sentence should be expanded on to indicate that any stormwater not infiltrated due to high groundwater levels that “*would be diverted to storm drains or onto street surfaces or routed to other stormwater management facilities as applicable*” will be required to include best management practices (BMPs) as part of the proposed diversion system to comply with the relevant stormwater discharge permits of the appropriate agency responsible under the applicable Regional Water Quality Board (Los Angeles or Santa Ana Regional Board).
- Hazards and Hazardous Materials:
 - MP-H2** – The last sentence should also include Los Alamitos Joint Forces Training Base for notification.

7-5

7-6

The Planning Commission and the Environmental Quality Control Board (EQCB) considered and discussed the DPEIR document on April 6 and April 13 2005, respectively, and the City Council considered the DPEIR document on April 25, 2005. The City Council, Planning Commission, and the EQCB authorized the Mayor and the respective Chairs to sign this letter indicating the official comments of the City of Seal Beach.

7-7

Upon the preparation of the Final Program EIR for this project, please send 4 hard copies and a digital copy, if available, 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 telephone (562) 431-2527, extension 313, or by e-mail at lwhittenberg@ci.seal-beach.ca.us.

Sincerely,



Paul Yost, Mayor
City of Seal Beach



Phil Ladner, Chairman
Planning Commission



Mario Voce, Chairman
Environmental Quality Control Board

Distribution:

Seal Beach City Council
Seal Beach Environmental Quality Control Board

Seal Beach Planning Commission

City Manager
Director of Development Services
Director of Public Works/City Engineer



COUNTY OF ORANGE

RESOURCES & DEVELOPMENT MANAGEMENT DEPARTMENT

Bryan Speegle, Director
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Santa Ana, CA 92702-4048

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NL 05-004

Comment Letter No. 8

May 4, 2005

Mr. Marty Moreno
County of Los Angeles Department of Public Works
Watershed Management Division
P.O. Box 1460
Alhambra, CA 91802-1460

SUBJECT: DPEIR for the San Gabriel River Corridor Master Plan (SGRCMP)

Dear Mr. Moreno:

The above referenced item is a Draft Program Environmental Impact Report (DPEIR) for the County of Los Angeles Department of Public Works (LACDPW). The proposed project area is a 1-mile wide corridor along 58 river miles of the San Gabriel from its headwaters in the San Gabriel Mountains to its terminus at the Pacific Ocean between Long Beach and Seal Beach. The project area includes 19 cities as well as unincorporated areas of Los Angeles and Orange counties, and encompasses a total of approximately 58 square miles. The Master Plan (SGRCMP) is a consensus-based document that recognizes and addresses a renewed interest in recreation, open space, and habitat while also seeking to enhance and maintain flood protection, water conservation benefits, along with existing water rights.

The County of Orange has reviewed the DPEIR and offers the following comments:

FLOOD

Our review was limited to regional surface hydrologic issues impacting facilities that are operated and maintained by the Orange County Flood Control District (OCFCD).

1. Several OCFCD facilities such as Coyote Creek Channel (A01), Los Alamitos Channel (C01), Los Alamitos Retarding Basin (C01B01), Rossmoor Retarding Basin (C01B02), Los Alamitos Pump Station (C01PS1) and Rossmoor Pump Station (C01P02) are within the project area. Consequently, any modifications to flood control facilities, operated and maintained by OCFCD need to be accomplished only after detailed engineering analyses of hydrologic, hydraulic and structural issues have been made; the potential impacts on

8-1

8-1
(Cont'd)

OCFCD's facilities have been assessed; and all impacts including impacts to upstream and downstream properties appropriately mitigated to the satisfaction of the County's Manager of the Flood Control Division (FCD).

2. **8-2** Project ID Number R7.04 suggests that a wetland will be created within the Los Alamitos Channel to treat Coyote Creek flows. The use of any OCFCD flood control facility for purposes other than flood control needs to be coordinated with the County's Flood Control Division Manager and must receive his approval before proceeding. We recommend that this project be coordinated with an ongoing U.S. Army Corps of Engineers (ACOE) Coyote Creek Watershed Study.

3. **8-3** Project ID Number R7.08 suggests that wetlands or a new retarding basin will be constructed near the end of the Los Alamitos Channel to expand flood control capabilities. Instead of a new basin, what is currently being designed is a modification of existing Los Alamitos basin and pump station. As previously mentioned, the use of any flood control facility for purposes other than flood control needs to be coordinated our Flood Control Division Manager and must receive his approval prior to implementation. Similarly, we recommend that this project be coordinated with an ongoing ACOE Coyote Creek Watershed Study.

4. **8-4** All work within or adjacent to OCFCD right-of-way should be conducted so as to not worsen OCFCD facilities' structural integrity and hydraulic flow conditions including OCFCD's ability to access facilities for maintenance, repair, and reconstruction. All work within, over and under OCFCD and County of Orange right-of-way should be conducted only after encroachment permits for the proposed work have been obtained from the County.

WATERSHED

5. **8-5** The County of Orange, along with the ACOE and the County of Los Angeles Department of Public Works is currently in the initial stages of the Coyote Creek Watershed Management Plan and Feasibility Study (Watershed Plan). Our planning team recognizes the importance of building off of and dovetailing with existing plans and the SGRMP is no exception. The SGRMP is a model project for collaborative efforts on multiple-objective plans and projects. Its' stakeholder-driven approach to planning is one which our Watershed Plan will continue, and projects identified in the SGRMP will be assessed during this study.

6. The following comments pertain to specific projects identified in the San Gabriel River Master Plan, Chapter 3:

8-6 a. Project R7.01 - Coyote and Carbon Creeks Watershed Management Plan: The County of Orange and the ACOE are currently developing project R7.01, listed as the "Coyote and Carbon Creeks Watershed Management Plan." The project has since been split into two separate phases with different names. Phase 1, currently now in development is called the "Coyote Creek Watershed

Management Plan” headed by the County of Orange. All interested stakeholder are invited to attend the initial public meeting, Wednesday, May 11, Brea City Hall, either 2:00pm-4:00pm OR 6:00pm-8:00pm. Phase 2, the “Coyote Creek-Lower San Gabriel River Watershed Feasibility Study” in its early stages pending increased funding for the ACOE.

- b. The Phase 1 Management Plan will identify and prioritize potential projects for implementation through stakeholder input and spatial analysis using Geographic Information System (GIS) mapping. The San Gabriel River Master Plan Projects that will be addressed include:

R6.11 – West Branch Greenway Rails-to-Trails

R6.21 – El Dorado Regional Park Wetlands

R6.22 – El Dorado Nature Center Master Plan

R7.03 – Coyote Creek Debris Boom

R7.04 – Los Alamitos Channel Treatment Wetland

R7.05 – Proposed Confluence Bridge

R7.07 – Los Cerritos Wetland Restoration (Bryant & Bixby)

7.08 – County of Orange Flood Control Basin

7.09 – Trail Connections Between Wetlands

7.10 – Hellman Ranch Wetlands Freshwater Marsh Restoration.

- c. Project R7.02 – Coyote Creek Bike Trail Enhancements:
The County of Orange is currently partnering with local non-profit organization Trails4All to request funding from the San Gabriel and Lower Los Angeles Rivers & Mountains Conservancy to develop the renamed “Coyote Creek Regional Bikeway Improvements” project. This project would involve a Working Group of all landowners along Coyote Creek, including several Cities, the Counties of Los Angeles and Orange, and other key stakeholders to develop a regional Bikeway signage programs and to develop a long-term Trails Needs Assessment and Master Plan.

WATER QUALITY

7. | Section 4.6 Page 20 – The National Pollutant Discharge Elimination System (NPDES)
8-7 | Stormwater Program section should include a discussion of the County of Orange 2003

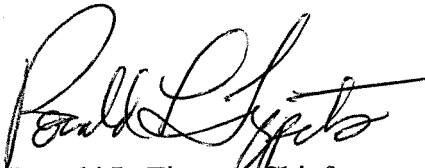
8-7 | Drainage Area Management Plan (DAMP), which will apply to any projects conducted
(Cont'd) | within Orange County.

8. | Section 4.6.5.2 Construction Impacts on Surface Water Quality Page 39 – The discussion
8-8 | of CD-W1 should include reference to compliance with the County of Orange 2003
DAMP. Water quality impacts of projects conducted within Orange County should be
evaluated in accordance with the provisions outlined in Exhibit 7-1 of the 2003 DAMP.

9. | Section 4.6.6 Mitigation Measures for Concept Design Studies Page 42 – The discussion
8-9 | of CD-W1 should include reference to compliance with the County of Orange 2003
DAMP. Water quality impacts of projects conducted with Orange County should be
evaluated in accordance with the provisions outlined in Exhibit 7-1 of the 2003 DAMP.

Thank you for the opportunity to respond to the DPEIR. If you have any questions, please
contact Charlotte Harryman at (714) 834-2522.

Sincerely,



Ronald L. Tippetts, Chief
Environmental Planning Division



P.O. Box 23005
Santa Ana, CA 92711-3005

Comment Letter No. 9

May 3, 2005

Mr. Marty Moreno
San Gabriel River Watershed Manager
County of Los Angeles Department of Public Works
Post Office Box 1460
Alhambra, CA 91802

Subject: Comments to San Gabriel River Master Plan EIR – SCH No. 200304117

9-1

The Fly Fishers Club of Orange County (FFCOC) is pleased to submit the following comments to the San Gabriel River Master Plan's Environmental Impact Report. While many of these comments are identical to those submitted in response to the draft Master Plan, the FFCOC believes that it is important to reiterate them formally through the EIR process, as we have found no evidence that our earlier comments have been addressed in the Plan. If there are questions, concerning these comments, please contact Mr. David M. Long, FFCOC's representative on the Stakeholders Committee. Mr. Long can be contacted at (714) 578-0422.

9-2

1. The FFCOC proposed three projects for the Master Plan (Chapter 3.). The Plan shows these as studies only. The FFCOC originally notified the County staff of the need to show these as full projects in August 2003. While it is recognized that initial studies will be needed for each project, and the FFCOC had funded the initial studies, the project definitions and descriptions are for implementation of the projects and not studies alone. The three projects were originally identified in a FFCOC sponsored study to identify recreational opportunities (fishing) in the upper river corridor. That report, provided to the County and MIG should have been included in the recent reports for the river. The identified FFCOC projects are:
 - A. Establishing a "Fisherman's Trail" around or across the LACPWD controlled property at Cogswell Dam – The trail is needed to access the West Fork of the San Gabriel River above the dam. It is noted that the recent closure of the existing access across Cogswell Dam (post 9/11 security claims by County staff) has also cut off access to the Devil's Canyon area and that canyon's stream. A Fisherman's Trail might be able to provide access to both the West Fork and to the existing Forest Service trail into Devil's Canyon. A second trail might be necessary to solve this further access restriction to areas adjacent Cogswell Dam.

*Dedicated to
the enhancement
of Flyfishing
through Conservation,
Education, & Fellowship.*

9-2
(Cont'd)

- B. Fishing on Morris Dam Reservoir and San Gabriel Dam Reservoir – This FFCOC proposed project consists of providing public access to the reservoirs, by allowing float tubes and un-motorized boats onto the waters and shoreline of these two water bodies.
- C. Establishing minimum in-stream flows below Morris Dam. This project consists of establishing a year round stream with minimum flows from Morris Dam, augmented by delivery of water from MWD into the stream below Morris Dam. The initial study commissioned by FFCOC is in final draft form, and available for review. The study recommends additional evaluation of dam operations (both San Gabriel and Morris) to determine how best to achieve the stated project objective. The study does not resolve the question concerning whether the operations of these two dams are in compliance with State regulations concerning flows allowing the passage of fish.

9-3

The specific issues this raises for the adequacy of the EIR is in the need to evaluate the impacts from implementation of the proposed projects rather than impacts from a study. Clearly the possibility for implementation of the proposed projects would be greatly improved if they were included in this EIR, and not at some later date having to show conformance with Master Plan and EIR.

9-4

2. Policy Recommendations. The FFCOC was very pleased that this section has been developed and placed into the Master Plan. Clearly a number of overarching policies covering habitat, open space and recreation within the river corridor need to be adopted and approved to assure that opportunities are identified and implemented. The FFCOC had suggested the following: A. Any project or maintenance work within the river proper should include a component that improves or enhances the movement of fish & wildlife and distribution of native plants within the corridor. Low flow channels, changes in the design of drop structures, and permitted development of native riparian plants within the channel proper, plantings on and adjacent to flood protection structures (as examples) should be a component of any activity done to maintain flood protection and water distribution. B. Any changes to San Gabriel River's water movement, water storage capacity or water usage (irrigation to potable use or surface water flows converted to ground water storage as examples) should be a required to provide a percentage allotment to maintain or enhance in-stream habitat, wildlife, or recreational opportunities. These habitat/recreation offsets should be maintained within the San Gabriel River system and not transferred to other streams. C. A formal administrative review panel, that includes non-governmental/agency individuals needs to be established, and tasked with review and approval of river corridor projects to verify compliance with Master Plan objectives, and if necessary negotiate changes (or cancellation) to proposed projects/programs if such projects/programs do not adequately address habitat and recreational enhancement opportunities.

9-5

Again with respect to the EIR some evaluation as to the environmental adequacy of current operations and policies needs to be addressed. The FFCOC's sponsored legal opinion (provided by to the County) indicated that the County's current operation of releases from Morris Dam are not consistent with mandated legal requirements for maintaining fish and wildlife. We are confident that this is a correct and reasonable conclusion that the Plam's

9-5
(Cont'd)

EIR must address. Similarly we are equally confident that if the EIR was to address other county run operations within the River corridor, other such infractions of environmental requirements would also be found (as an example passage requirements at the County's inflatable dams.

9-6

4. Comments on Chapter I – The San Gabriel River. The FFCOC suggests that the EIR specifically address:

A. That for sections 1.4 and 1.5 - a discussion on the conversion of river water from a free flowing natural stream, to increased water usage for agriculture (first cattle/sheep then to crops), to potable uses and associated impacts to native habitats within the corridor.

9-7

B. It is essential that the EIR for this initial section, provide a concise and accurate description of the water rights to surface and groundwater sources emanating from the River. While admittedly complicated, this component must be described to provide an overlay of water controlling agencies within the basin, and which agency/water district may be impacted from any specific project proposed for implementation within the Plan.

As mentioned in our comments to the master Plan the FFCOC believes that the planning process was purposefully designed to exclude many groups and organization from full participation. We are of the opinion that that the plan process should have been expanded to provide greater access for non-profit volunteer, and private citizen participation in Plan development. The following observations and recommendations are provided:

9-8

The original process of meetings every other month for 4 hours per session, while conducive to agency, municipal, and industry involvement (regular business hours in large blocks of time) - and reduces consultant travel expenses, effectively excludes active, frequent participation by the volunteers of many non-profit or recreational groups, who would prefer evening meetings. Members of these latter groups typically are working during the day and therefore cannot participate. The change to longer sessions further alienates these volunteer based organizations that may have at least a few individuals able to attend meetings by taking a "late lunch". It is observed that the number of volunteer based organizations, and the number of representatives from those organizations attending individual meetings has diminished, while participation by city, county, and special districts has increase with the change to longer sessions. It is also observed, that in other venues where evening meetings are used to discuss recreational issues large numbers of people and organizations show up and provide significant input to the planning process.

Specific groups that might have been expected to participate regularly in the planning process need to be identified and an outreach effort made to include these groups in the plan review process, and a mechanism developed to incorporate any new perspectives or initiatives. Examples of disenfranchised or under represented organizations (though nowhere complete) are. Boys/Girls Clubs, YMCA/YWCA, Boys/Girl Scouts, Audubon, Native Plant Society, Surf Rider Foundation, area hiking clubs, area biking clubs (notable by absence from the plan process), after school programs from any school district in the corridor, area historical societies, State and County Park volunteer organizations, organizations that

9-8
(Cont'd)

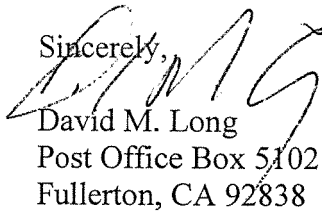
currently use local parks, Forest Service volunteer organizations, and area fishing organizations.

9-9

Lastly, while it is appreciated that the County of Los Angeles Department of Public Works has made an effort to reduce the use of paper in dissemination and review of both the Master Plan and EIR, it is noted that reliance on electronic formats is another example of limiting access to those groups with adequate computer capabilities. It is further noted that the format selected is not easily navigated, further limiting access and input into the planning review process.

We believe that the EIR must address these inadequacies and reopen the planning process to address these issues.

Sincerely,



David M. Long
Post Office Box 5102
Fullerton, CA 92838

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SUSAN M. TRAGER
OF COUNSEL
FRANCIS D. LOGAN, JR.

May 5, 2005

Comment Letter No. 10

VIA FACSIMILE AND US MAIL

Mr. Jerry Burke
County of Los Angeles
Department of Public Works
Watershed Management Division
P.O. Box 1460
Alhambra, CA 91802-1460

Re: Draft Program Environmental Impact Report for the San Gabriel River
Corridor Master Plan

Dear Mr. Burke:

This letter sets forth the comments of Rose Hills Memorial Park & Mortuary ("Rose Hills") with regard to the Draft Program Environmental Impact Report ("Draft EIR") for the San Gabriel River Corridor Master Plan ("Master Plan") and the Master Plan itself recently circulated by the County of Los Angeles Department of Public Works ("County").

Rose Hills applauds the County's goals to increase the open space, habitat and recreation opportunities in the San Gabriel River Corridor. Rose Hills writes only to request that the County consider more closely the possible impacts on Rose Hills of two particular projects set forth in the Master Plan and analyzed in the Draft EIR – the San Gabriel River Discovery Center at Whittier Narrows and the Lario Creek Project. Rose Hills also notes that a number of projects relating to recharge in the Master Plan were not studied in this Draft EIR and that these projects including the Whittier Narrows Dam Water Conservation Pool and the Whittier Narrows Nature Center Ecosystem Restoration projects could potentially have very significant environmental effects. Rose Hills requests therefor that the impacts of these recharge projects on Rose Hills and its neighbors are fully studied in the next level of analysis under the California Environmental Quality Act, Public Resources Code section 21000, et seq. ("CEQA").

10-1
(Cont'd)

Interest of Rose Hills

Rose Hills owns and operates a 1,400 acre cemetery in the Puente Hills at the foot of the San Gabriel Mountains. Located southeast of the Interstate 605 freeway near the Whittier Narrows, the cemetery is partially included in the 0.5 mile study area of the Master Plan and Draft EIR. A small portion of the cemetery can be seen, in the lower

Mr. Jerry Burke
May 5, 2005
Page 2

right-hand corner of Figure 3-9: "Preliminary Concept Design - Lario Creek". A satellite map which more clearly shows the cemetery and its proximity to the Lario Creek project is attached.

10-1
(Cont'd)

The Rose Hills cemetery is one of the largest in the world. The size of the facility, coupled with its breathtaking views over the Los Angeles basin, allows Rose Hills to offer solitude, tranquility and beauty to people during emotionally trying times. Rose Hills is committed to ensuring that it can continue to offer this experience to its clientele for many years to come. Rose Hills would oppose any aspect of the Master Plan which would interfere with the expectation of its clients, particularly aspects which might diminish the tranquil setting.

Rose Hills operates in a challenging regulatory environment. It holds permits from virtually every single regulatory agency in the Los Angeles Basin, allowing it to engage in the various functions of a cemetery, including cremation and internment. Rose Hills would object to any project which would make its regulatory compliance more difficult.

The Draft EIR Fails to Consider the Impacts of the Discovery Center and Lario Creek Projects on Rose Hills

Rose Hills notes that the only two projects in the Master Plan and analyzed in the Draft EIR appear to affect it due to their proximity to the cemetery: the Discovery Center and the Lario Creek projects.

10-2

The Draft EIR appears to be inadequate due to its failure to analyze the impacts of the contemplated projects beyond the 1-mile study area. CEQA and its implementing regulations, Cal. Code Regs., tit. 14, section 15000 et seq. ("CEQA Guidelines") do not allow the County to select an arbitrary boundary of 0.5 miles on either side of the San Gabriel River as the limit of the study area.

An EIR shall identify and focus on the significant environmental effects of the proposed project. ... Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects.

(CEQA Guidelines, § 15126.2, emphasis added.) The Draft EIR fails in its analysis of the indirect effects of the planned projects, including the possible indirect effects on the operation of Rose Hills.

Mr. Jerry Burke
May 5, 2005
Page 3

10-2
(Cont'd)

The analyses of the Discovery Center project and Lario Creek projects are silent on their regional impacts. But Rose Creek is a special place, requiring quiet and clean air. Both the Discovery Center and Lario Creek projects contain at least the possibility of imposing significant environmental effects on Rose Hills. Possible environmental impacts include the following: noise pollution carrying over to Rose Hills, from increased vehicle traffic and increased human use; air pollution adversely affecting the views available from Rose Hills; and growth-inducing impacts leading to a regional environment inconsistent with Rose Hills' land use. This is not a case in which the analysis in the Draft EIR is inadequate; the analysis is instead completely absent. This is a straightforward CEQA violation requiring revision and recirculation of the Draft EIR.

In the preparation of a revised Draft EIR, the County at a minimum should conduct acoustic studies, viewshed impact studies, air pollution studies and traffic studies to evaluate the impacts of the proposed projects on Rose Hills.

Deferring Analyses to Subsequent Environmental Studies Is Not Acceptable

10-3

It appears that the Draft EIR tries to accommodate the lack of analysis by asserting that later project proponents will prepare second-tier EIRs. (See Draft EIR, §1-5, at p. 1-6.) The County should not condone such slipshod practice. CEQA and the CEQA Guidelines allow for "program" EIRs, in connection with the issuance of regional plans. (CEQA Guidelines, § 15168.) But the County cannot duck its responsibility to analyze the impacts of the Discovery Center and Lario Creek projects simply because they are part of a larger program. (*Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182 [55 Cal.Rptr. 625].) The Discovery Center and Lario Creek projects are far enough along in their planning to obligate the County to engage in a complete CEQA analysis at this stage of analysis.

The CEQA Guidelines point out the need for program level EIRs to be sufficiently detailed. The CEQA Guidelines state:

A program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

(CEQA Guidelines, § 15168(c)(5).)

Mr. Jerry Burke
May 5, 2005
Page 4

The CEQA Guidelines go on to state:

If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration.

(CEQA Guidelines, § 15168(c)(1).)

Given this regulatory view of program EIRs, the Draft EIR fails to serve any real purpose. With regard to the Discovery Center and Lario Creek projects alone, the County has failed to study any regional or growth-inducing impacts. All of these impacts will need to be analyzed in a project-level EIR when they should be analyzed in the Draft EIR.

It appears to Rose Hills that the Draft EIR is not adequate even as a program EIR. However, to the extent that the County ends up certifying the Draft EIR as the program EIR for the Master Plan, Rose Hills requests that the project-level EIRs for all projects which could affect Rose Hills, including the Discovery Center and Lario Creek projects, fully comply with CEQA. Rose Hills asks to be notified of the intent to undertake CEQA analysis for both of those plans monitoring of impacts, and possible offsetting mitigation may be required.

The Recharge Projects, Including Whittier Narrows Dam Water Conservation Pool and the Whittier Narrows Nature Center Ecosystem Restoration Projects, Potentially Have Significant Impacts

Rose Hills is extremely concerned about the possible impacts of a rising water table on cemetery operations and on regional soil stability. Liquefaction, leading to landslides; contamination of the groundwater and interference with internment operations are all possible consequences of a recharge program.

The water supply and water quality analysis within the Hydrology section of the Draft EIR does not contain any analysis of the possible environmental impacts caused by a high water table beneath the cemetery. This failure will require that later EIRs for any recharge project go through extensive analysis to ensure that those possibly significant environmental effects are fully mitigated.

The needs of the community for the services provided by Rose Hills and the unique environment offered by the Rose Hills facility, should be respected by the County.

LAW OFFICES OF
SUSAN M. TRAGER
A PROFESSIONAL CORPORATION

Mr. Jerry Burke
May 5, 2005
Page 5

10-7
(Cont'd)

We ask that the County take all appropriate steps to preserve the tranquil atmosphere of Rose Hills Memorial Park.

Sincerely,

LAW OFFICES OF SUSAN M. TRAGER
A Professional Corporation



Susan M. Trager

SMT:my

Attachment



1000 N Durfee Ave South El Monte, CA 91733



WMD
337

April 27, 2005

Comment Letter No. 11

Mr. Marty Moreno
Los Angeles County Department
of Public Works
Watershed Management
P.O. Box 1460
Alhambra, CA 91802-1460

RE: Draft Program Environmental Impact Report
for the San Gabriel River Corridor Master Plan
(SCH No. 2003041187)

Dear Mr. Moreno:

Thank you for providing the Main San Gabriel Basin Watermaster (Watermaster) with a copy of the document entitled "Draft Program Environmental Impact Report for the San Gabriel River Corridor Master Plan" (Draft Program EIR) dated February 2005. Previously, the Watermaster provided the County of Los Angeles Department of Public Works (LACDPW) with comments dated May 8, 2003 for the Notice of Preparation, November 3, 2003 for the San Gabriel River Master Plan Project Policy and Program Categories, and November 25, 2003 for the San Gabriel River Master Plan Project Administrative Draft. After reviewing the Draft Program EIR, Watermaster has the following comments.

11-1

Table 2-1, Organizations Involved, Page 2-2 lists the San Gabriel River Water Committee under both Water Districts/Agencies and Organizations. It appears that perhaps the San Gabriel River Watermaster is the agency that should be listed under Water Districts/Agencies.

11-2

Table 3-7, Master Plan Concept Design Studies, Page 3-15 lists the five Concept Design Studies and summarizes CEQA project objectives for each of the five studies. The Concept Design Studies should not diminish existing Flood Protection/Water Supply/Water Quality and, wherever possible, should enhance these components.

11-3

Table 4.6-2, Dams on the San Gabriel River, Page 4.6-6 lists the capacity of San Gabriel Reservoir as 41,549 AF, and Morris Reservoir at 39,300 AF. Are these current or original capacities? The data appears to be inconsistent with the LACDPW Hydrologic Reports (HR) for years 1994-97. In HR 1994-96 Morris is listed as having a 21,800 AF capacity and in HR 1996-97 San Gabriel is listed as having 53,344 AF capacity.

11-4

Section 3.3.1.2 River Corridor Policies and Programs, Page 3-12.

The policy as listed, "Create opportunities for stormwater infiltration," should add the phrase "...without adding contamination." As noted in our November 3, 2003 response, creating opportunities for stormwater retention/infiltration through devices such as bio-engineered wetlands, infiltration swales, porous pavement and/or other Best Management Practices may result in unintended groundwater contamination. Until identification and fate of pollutants which would be infiltrated are completely known, caution should be used until protection of the groundwater is assured. Petroleum hydrocarbons and MTBE could contaminate groundwater. Although percolation may be minimal, such projects should be closely monitored and should not interfere with groundwater cleanup activities. Also, the potential impacts of Nitrate contamination should be analyzed, especially at the Woodland Duck Farm site.

11-5

Section 3.3.3.1 San Gabriel Canyon Spreading Grounds, Page 3-20.

Watermaster remains concerned about the potential inclusion of a floating island in the San Gabriel Spreading Grounds. As noted in our November 25, 2003 response, constructing a floating island may negatively impact maintenance and operations of the spreading grounds, and these impacts and conflicts should be addressed before adding this component to the project. Ideally, no proposed project should include components that are located within the perimeter of existing spreading facilities. In addition, any project near the spreading grounds must assure security, preserve historic percolation capacity, and ensure no contaminants are introduced to the area.

11-6

Section 3.3.3.4, Lario Creek, Page 3-29.

"...flows can vary at different times from close to zero to over 100 cfs." A cursory review of flow data in Lario Creek, recorded at stream gaging station F313B-R, indicates flows on many days were significantly above 100 cfs and on some days exceeded 200 cfs. The statement should be modified to accurately reflect potential flows. Also, any proposed modification of Lario Creek should include a component to preserve a stream gaging station at all times with accuracy equal to or greater than F313B-R. This station is critical to the analysis of flows between the San Gabriel River and Rio Hondo as part of the Long Beach Judgment.

11-7

Section 4.6.1.1, Surface Water Features, Page 4.6-5.

"Average flows range between 40 and 100 cfs..." The study period includes primarily years with below average rainfall and runoff, so the evaluation of flows may be distorted. During water year 2004-05 flows have been in the 1,000's of cfs.

11-8

Section 4.6.1.1, Other Discharges, Page 4.6-8.

The San Gabriel Valley Municipal Water District's outlet discharges directly into the northern pit of the San Gabriel Canyon Spreading Grounds and not downstream of the spreading grounds.

11-9

Section 4.6.1.3, Water Rights, Page 4.6-13 states, "SWRCB...has declared the San Gabriel River fully appropriated, i.e. no new users can file for a share of the river water." However, throughout the Draft Program EIR reference is made to capturing and reusing storm runoff. For example page 4.6-32 notes, "...wetlands may be designed with retention, reuse, and/or infiltration of storm water." Capturing and reusing storm water runoff for a beneficial use other than groundwater recharge would be viewed as an appropriation of surface water flow. The San Gabriel River system is fully appropriated and no proposed project should include a direct reuse option. The water rights owned by the San Gabriel Valley Protective Association are used to spread surface water flow in the San Gabriel River Watershed to recharge adjudicated groundwater basins. The water is subsequently produced by groundwater rights holders. The proposed Draft EIR Program projects should not interfere with the fully appropriated surface water rights, although the Draft Program EIR acknowledges the potential impact on surface and ground water rights associated with actions involving groundwater recharge or surface diversions as an "Area of Known Controversy".

11-10

Section 4.6.1.3 Water Rights, Main San Gabriel Basin Watermaster, Page 4.6-14. The list of parties that pump more than 5,000 acre-feet should also include the cities of Alhambra, Azusa and Monterey Park; and delete Pellissier. Also, the Main San Gabriel Basin Watermaster annual Operating Safe Yield is based on a number of factors, including rainfall, groundwater levels, water held in storage, and various other considerations.

11-11

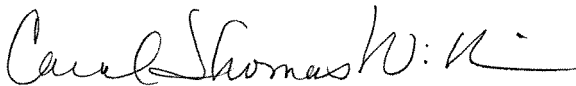
Section 4.6.1.3 Water Rights, San Gabriel Valley Protective Association, Page 4.6-16. The members listed should also include Cadway Inc., East Pasadena Water Company, and Valley County Water District.

11-12

Section 4.6.1.4 Water Quality, Page 4.6-25. Portions of the South El Monte Operable Unit also overlap the Master Plan study area.

Please call me or Anthony Zampello at (626) 815-1300 if you have any questions.

Sincerely,
MAIN SAN GABRIEL BASIN WATERMASTER



Carol Thomas Williams
Executive Officer

cc: Stetson Engineers Inc.
San Gabriel Valley Protective Association
San Gabriel River Water Committee

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MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

WMD
085

Executive Office

Comment Letter No. 12

May 4, 2005

VIA FACIMILE

Mr. Marty Moreno
County of Los Angeles Department of Public Works
Watershed Management Division
P.O. Box 1460
Alhambra, California 91802-1460

Dear Mr. Moreno:

Draft Program Environmental Impact Report for the San Gabriel River Corridor Master Plan

The Metropolitan Water District of Southern California (Metropolitan) has reviewed a copy of the Draft Program Environmental Impact Report (Draft PEIR) for the San Gabriel River Corridor Master Plan (Master Plan). Metropolitan provided a comment letter dated May 22, 2003 (attached), in response to the Notice of Preparation for the Draft PEIR. Metropolitan appreciates your efforts to address our concerns; however, the following issues have not been adequately addressed in the Draft PEIR.

12-1 Habitat restoration and enhancement is a major objective of the Plan, as shown in Table 3-1 of the Draft PEIR. Specifically, the San Gabriel Canyon Spreading Grounds - Preliminary Concept Design, proposes floating islands in the spreading basins for habitat and educational purposes that could be connected by a cable and weight system to the bottom of the basin, and planted with wetland vegetation providing habitat for breeding and migrating bird species. The Draft PEIR acknowledges potential conflicts between groundwater recharge activities and habitat as an issue requiring further investigation. However, it does not identify potential impacts or mitigation measures stemming from this conflict. Habitat restoration and its consequences could significantly impact Metropolitan's ability to deliver Replenishment Service to recharge basins, and seriously impact water resources and water supply in the Master Plan area.

Increased vegetation in the channels would increase the amount of time that the County would have to devote to brush clearing operations. Such activities are normally undertaken in the late summer and early fall in preparation for the winter storm season. Metropolitan can not deliver Replenishment Service while work is occurring in the channels, and channel clearing activities often coincide with the availability of Replenishment Service. The more time spent in the channel engaging in this activity, the smaller the window of time available for delivery of Replenishment Service.

Mr. Marty Moreno

Page 2

May 4, 2005

As stated in our May 22, 2003 letter, "It is imperative that Metropolitan's member agencies' ability to take imported water for groundwater replenishment is not impacted. Imported water for replenishment is generally available on a seasonal basis and the ability to deliver water to these agencies on short notice can be important both to Metropolitan's operations and the member agencies receiving the imported water." "Deliveries through these connections are often problematic, because the downstream facilities operated and maintained by the County are not always available for the delivery of water to our member agencies. Sometimes when water is available to Metropolitan, the County is unable to facilitate deliveries due to maintenance or basin conditions. Therefore, when water is available and the County has the ability to move the imported water, it is imperative that the water be moved or the opportunity may be lost." Metropolitan again requests that the County ensures Metropolitan's operations are not impacted by the Master Plan.

Habitat restoration might further limit Metropolitan's ability to deliver Replenishment Service by introducing species requiring special protection measures that conflict with Metropolitan's spreading operations. This concern was addressed in our May 23, 2003, letter, as follows: "In order to avoid conflicts with Metropolitan facilities, provisions to allow emergency excavation and repair must be included in the Master Plan. Also, creation of wetland and sensitive habitat within and adjacent to Metropolitan facilities must be avoided and any sensitive habitat and/or revegetation processes must be carefully planned to avoid conflicts with Metropolitan facilities." The Draft PEIR does not include any such provisions; Metropolitan requests that this issue be addressed in the document.

The potential impacts on water supply resulting from limitations of replenishment delivery stemming from this Master Plan should be identified in the Draft PEIR. Water supply in areas overlying the Main San Gabriel Basin and Central Basin is highly dependent on the delivery of imported replenishment water. Replenishment Service often becomes available on very short notice making its delivery to the Main San Gabriel Basin and Central Basin highly dependent on close cooperation between Metropolitan, its member agencies, basin groundwater managers, and the County. Until the recent rains, groundwater levels in these basins were becoming precariously low, further underscoring the importance of delivering Replenishment Service as it becomes available. Any restrictions in Replenishment Service could seriously impact water supply in these areas.

As stated in our May 23, 2003 letter, "...Metropolitan is required to coordinate any activities that might affect groundwater with its member agencies that receive groundwater recharge. The Draft PEIR must include measures to ensure that imported groundwater replenishment operations by Metropolitan's member agencies are not negatively impacted." The Draft PEIR does not include any such provisions; Metropolitan again requests that this issue be addressed in the document.

12-1
(cont'd)

Mr. Marty Moreno

Page 3

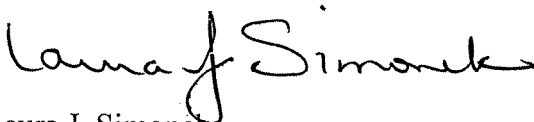
May 4, 2005

12-2

Lastly, Metropolitan has the following request regarding the Master Plan Program Mitigation Measure, Section 4.9.5.3 Utilities, MP-P4. Please change this mitigation measure to require geotechnical investigations during design of stormwater infiltration facilities in the vicinity of Metropolitan facilities to ensure that their integrity is not impacted by changes in soil conditions. If results of the investigation indicate that stormwater infiltration may saturate the soil and may affect the integrity of our pipelines, appropriate mitigation measures would need to be included during the design phase to ensure our pipelines are not compromised.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving a copy of the Final PEIR. If we can be of further assistance, please contact Mr. William Fong at (213) 217-6899.

Very truly yours,



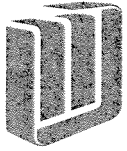
Laura J. Simonek
Manager, Environmental Planning Team

LIM/rdl

(Public Folders/EPU/Letters/27-APR-05C.doc - Marty Moreno)

Enclosure: Metropolitan letter dated May 22, 2003

Cc: Rama Rydman
County of Los Angeles
Department of Public Works
Watershed Management Division
P.O. Box 1460
Alhambra, California 91802-1460



MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

COPY

May 22, 2003

Mr. Marty Moreno
County of Los Angeles Department of Public Works
Watershed Management Division
P.O. Box 1460
Alhambra, CA 91802-1460

Dear Mr. Moreno:

Notice of Preparation of a
Draft Program Environmental Impact Report for the San Gabriel River Master Plan

The Metropolitan Water District of Southern California (Metropolitan) has received a copy of the Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (Draft PEIR) for the San Gabriel River Master Plan (Master Plan). The County of Los Angeles Department of Public Works (LADPW) is the lead agency for this project. The proposed project will be a consensus-based document that will recognize and address a renewed interest in recreation, open space, and habitat, while also seeking to enhance and maintain flood protection, and water conservation benefits, along with existing water rights. The proposed project will focus on the 58-mile long San Gabriel River (River) from Cogswell Dam in the San Gabriel Mountains to the Pacific Ocean. The River corridor is primarily located within Los Angeles County; the mouth of the river is bordered by land within both Los Angeles and Orange counties. This letter contains Metropolitan's response to the Notice of Preparation as both a Responsible Agency and potentially affected agency.

Metropolitan owns and operates various facilities within the boundaries of the proposed Master Plan. The Metropolitan facilities include the following: Old Navy Peninsula, Foothill Feeder-Service Connection USG-3, Fish Canyon Adit to Monrovia Tunnel No. 3 of the Upper Feeder Pipeline, Upper Feeder Pipeline, Middle Feeder Pipeline, Lower Feeder Pipeline, and Second Lower Feeder Pipeline.

These Metropolitan facilities are described as follows:

- Old Navy Peninsula - Metropolitan owns property known as the Old Navy Peninsula on Morris Reservoir. The Peninsula is located on the west side of the reservoir, approximately 500 yards north of the Morris Dam.

Mr. Marty Moreno

Page 2

May 22, 2003

- The Foothill Feeder-Service Connection USG-3 has a 200-foot wide permanent easement and is located in Los Angeles County south of Morris Dam. Water is discharged from a 78-inch pipe and provides recharge for the Central and West Basin Municipal Water Districts.
- The Fish Canyon Adit to Monrovia Tunnel No. 3 of the Upper Feeder Pipeline is approximately two miles west of Morris Dam and Metropolitan has an access right-of-way that extends from the adit into the River.
- The Upper Feeder Pipeline is a ten-foot inside diameter pipeline with a 200-foot wide permanent easement and approximately 15 to 20 feet of cover at the River invert. It is located in Los Angeles County, just south of Morris Dam and traverses the River in an easterly to southwesterly direction.
- The Middle Feeder Pipeline is a 73-inch inside diameter pipeline with a 50-foot wide permanent easement and approximately 20 feet of cover at the River invert. The Middle Feeder traverses the River in an easterly to southwesterly direction at Ramona Boulevard, located within the cities of Irwindale and El Monte.
- The Lower Feeder Pipeline is a 70-inch inside diameter pipeline with a 40-foot wide permanent easement and approximately 15 to 20 feet of cover at the River invert. The Lower Feeder Pipeline traverses the River in an easterly to westerly direction just south of Firestone Boulevard in the city of Downey.
- The Second Lower Feeder Pipeline is a 78-inch inside diameter pipeline with a 30-foot wide permanent easement and approximately five to ten feet cover at the River invert. The Second Lower Feeder Pipeline traverses the River in an easterly direction from Keynote Street in the city of Long Beach.

Metropolitan is concerned with potential impacts to these facilities that may occur as a result of implementation of the proposed Master Plan. Metropolitan requests that the LADPW consider these facilities in its planning and analyze in the Draft PEIR potential impacts to these facilities that may occur as a result of implementation of the proposed Master Plan.

In order to avoid potential conflicts with Metropolitan's rights-of-way, we request that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Metropolitan must also be allowed to maintain its rights-of-way and access to its facilities at all times in order to repair and maintain the current condition of those facilities. The applicant may obtain detailed prints of drawings of Metropolitan's pipelines and rights-of-way by calling Metropolitan's Substructures Information Line at (213) 217-6564. To assist the applicant in preparing plans that are compatible with Metropolitan's facilities and easements, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern

California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

It is imperative that Metropolitan's member agencies ability to take imported water for groundwater replenishment is not impacted. Imported water for replenishment is generally available on a seasonal basis and the ability to deliver water to these agencies on short notice can be important both to Metropolitan's operations and the member agencies receiving the imported water. The following service connections can deliver water to the River:

- USG-03 Glendora Tunnel: Capacity maximum is 400 cubic feet per second (cfs); source of imported water is generally the State Water Project (SWP).
- CENB-48 La Verne Pipeline: Capacity maximum is 300 cfs; deliveries can be made to USG through this connection; source of imported water is generally the SWP.
- CENB-28 Upper Feeder Pipeline: Capacity maximum is 120 cfs; source of imported water is mostly a blend of the SWP and Colorado River Water.
- PM-26 Glendora Tunnel: Capacity is 20 cfs; source of imported water is the SWP.

Deliveries through these connections are often problematic, because the downstream facilities operated and maintained by the LADPW are not always available for the delivery of water to our member agencies. Sometimes when water is available from Metropolitan, LADPW is unable to facilitate deliveries due to maintenance or basin conditions. Therefore, when water is available and LADPW has the ability to move the imported water, it is imperative that the water be moved or the opportunity may be lost.

Metropolitan's facilities may also be used to dewater pipelines (blow-offs, pump wells, pressure relief valves) for maintenance or inspection. In addition, facilities along or adjacent to the River may contain pressure relief valves which operate automatically to relieve the pressure on a pipeline to ensure that Metropolitan's distribution system is not damaged by hydraulic transients that can occur due to pressure fluctuations arising from agency service connection problems, system malfunctions, or operator error. In these cases, water is automatically discharged from Metropolitan's system either directly into the River, or into a channel or flood control facility, which interconnects with the River. In the case of dewatering for a pipeline outage, the treated water in the pipeline is mixed with a chemical upon discharge to remove the residual from the disinfectant. When the pressure relief valve(s) open, treated water is discharged. The appropriate Regional Water Quality Control Board is notified in either case. LADPW needs to ensure that Metropolitan's operations (imported water deliveries, normal pipeline operations, and emergency discharge) are not impacted by the Master Plan.

Also, Metropolitan is required to coordinate any activities that might affect groundwater with its member agencies that receive groundwater recharge. The Draft PEIR and Master Plan must

Mr. Marty Moreno

Page 4

May 22, 2003

include measures to ensure that imported groundwater replenishment operations by Metropolitan's member agencies are not negatively impacted. The Draft PEIR must also include measures to ensure that recycled water replenishment operations by Metropolitan's member agencies at the Montebello Forebay spreading grounds, near Interstates 605 and 60, are not negatively impacted. Additionally, Metropolitan must be allowed to maintain discharge and other facilities (i.e., service connection USG-3, blow-off structures, air-vacuum valves, etc.) and 24-hour patrol access. The Draft PEIR and Master Plan must clearly and properly address these Metropolitan requirements.

In order to avoid conflicts with Metropolitan facilities, provisions to allow emergency excavation and repair must be included in the Master Plan. Also, creation of wetland and sensitive habitat within and adjacent to Metropolitan facilities must be avoided and any sensitive habitat and/or revegetation processes must be carefully planned to avoid conflicts with Metropolitan facilities. Additionally, engineered protections (i.e., protective slabs) to prevent erosion must be provided in any areas along the River that may be converted to greenbelt areas.


Metropolitan requests that the LADPW analyze the consistency of the proposed Master Plan with the growth management plan adopted by the Southern California Association of Governments (SCAG). Metropolitan uses SCAG's population, housing and employment projections to determine future water demand.

Additionally, Metropolitan encourages projects within its service area to include water conservation measures. Water conservation, reclaimed water use, and groundwater recharge programs are integral components to regional water supply planning. Metropolitan supports mitigation measures such as using water efficient fixtures, drought-tolerant landscaping, and reclaimed water to offset any increase in water use associated with the proposed project.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future environmental documentation on this project. If we can be of further assistance, please contact Mr. William Fong of the Environmental Planning Team at (213) 217-6899.

Very truly yours,

Original Signed By
Marty Meisler

 Laura J. Simonek
Manager, Asset Management
and Facilities Planning Unit

LIM/rdl

(Public Folders/EPU/Letters/22-MAY-03C.doc - Marty Moreno)

Enclosure: Planning Guidelines

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622 / WMD



Puente Hills Landfill
Native Habitat Preservation Authority

April 28, 2005

Comment Letter No. 13

Mr. Marty Moreno
County of Los Angeles Department of Public Works
Watershed Management Division
P.O. Box 1460
Alhambra, CA 91802-4119

Re: County of Los Angeles Department of Public Works, Draft Program EIR for the San Gabriel River Corridor Master Plan

Dear Mr. Moreno:

The Puente Hills Landfill Native Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the San Gabriel River Corridor Master Plan.

The Habitat Authority is a joint powers authority established pursuant to California Government Code Section 6500 *et seq.* with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. The purpose of the Habitat Authority is to acquire, restore and maintain open space in the Puente Hills as a permanent protection for the native habitat. Currently the Habitat Authority manages and/or owns 3,814 acres of open space. Properties owned and managed by the Habitat Authority lie within the Cities of Whittier and La Habra Heights, as well as in the County unincorporated area of the Puente Hills known as Hacienda Heights and Rowland Heights.

13-1

The Habitat Authority understands the project area includes the length of the San Gabriel River and one-half mile on either side of the river. It is unclear whether or not the lands owned and/or managed by the Habitat Authority are included in this project area. However, in reading the text and viewing the maps, it appears that our lands do have the potential to be affected.

Overall, there are many benefits that can result from the implementation of the River Master Plan such as increasing biodiversity for the region, however below are comments for your consideration:

13-2

Section 2- Introduction, page 2-2, Table 2-1, Draft Program EIR
The Habitat Authority should be reclassified as a County/Regional Government. It currently is categorized as a private organization.

13-3

Section 3 – Project Description, Table 3-1, Draft Program EIR
Under Objective H4, *Maintaining and enhancing wildlife corridors and linkages*, it is unclear how the Performance Criteria H4.3, *Maintains or reduces populations of wildlife meso-predators...and rodents that may transmit vector-borne diseases...*, is consistent with the objective. Although overabundance of mesopredators and mammalian vector species are valid concerns in the urban-wildland interface, consideration needs to be given to the role these species may assume in the larger ecosystem. For example, normal rodent and mesopredator population fluctuations should not always be interpreted as a problem requiring management. The response to undesired numbers of small mammals often includes the use of anticoagulant poisons. These poisons have the potential to harm predators up the food chain, often resulting in the death of large mammals and raptors. Therefore, we recommend that the Master Plan will suggest less toxic approaches, with the goal of a sustainable reduction in pest species achieved through healthy populations of top predators and responsible actions by local property owners to reduce opportunities for pest species. Additional comments about wildlife corridors are provided below.

13-4

Chapter 3, page 3-28, and Chapter 4, page 4-4, Map 4-1, Master Plan:
The suggestion of the R4-23 Puente Hills Western Wildlife Corridor project, which proposes to connect the Puente Hills to the San Gabriel River, needs to have further analysis from wildlife movement experts before consideration of implementation. A study designed and conducted by a biological research institute is recommended before terrestrials are reintroduced to the river area. We agree the connection has the potential to increase biological diversity for the area. However, this project also has the potential to create human wildlife interactions that could result in the euthanization of small mammals such as skunks, coyotes or raccoons. The precautions mentioned on page 4-4 such as wildlife-proofing trash cans, creating buffers and dispersing educational materials are good suggestions, but more needs to be done to prevent coyotes and other wildlife from being invited into picnic areas or other public recreational areas. Educational materials about co-existing with wildlife also need to be made available to park visitors, in addition to local residents as suggested. Littering, unkempt picnic areas, and dogs off leash all have the potential to generate unfortunate human-wildlife interactions. It is unclear from Map 4-1 how the wildlife movement from the Puente Hills would be northbound only and not southbound. If the route of travel was north, measures would need to be taken to ensure that wildlife would have not only a wildlife movement corridor available to them but also core habitat areas for their use along the way until the Angeles National Forest is reached 12 miles away.

13-5

Chapter 3, page 3-28, Master Plan:
In regards to R4.24 Equestrian Facilities Enhancement project which involves water quality runoff mitigation measures, we recommend that a situation not be created that will negatively impact wildlife. For instance, if wetland habitat is created, wildlife would be attracted. If the habitat consists of vegetated wetland, there is the potential that certain bird species may utilize the area for nesting. A situation could inadvertently be created where vector control or whoever is managing the wetland may need to disturb or clear the


13-5
(Cont'd) | habitat for public safety reasons. If this occurred, the wildlife would be negatively affected if it occurred during nesting season.

13-6 | Chapter 4, Map 4-9, page 4-23, Master Plan:
According to Map 4-9, the Groundwater Recharge Opportunities project has the potential to impact lands the Habitat Authority manages. The area known as Sycamore Canyon, which is owned by the Habitat Authority, is highlighted on the map as being a possible location for this project. Implementation of any project of this nature would need to be coordinated with this agency to avoid impacts to park operations and wildlife, and to avoid conflicts with utility or conservation easements in the area with possible surface area recharge activities. Recharge into the existing creek is a more feasible option which would require further analysis such as with the level of pollution found in the water or rate of water flow for consideration.

The Habitat Authority is in the process of preparing a Resource Management Plan with long-term goals for habitat restoration, wildlife connections, trails, education and overall management of our jurisdiction. It is expected to be completed in the year of 2006. This document can be made available for your future reference. Also, enclosed is the brochure, Western Puente Hills Access Guide, for background information about the Habitat Authority.

Thank you for your consideration of these comments. Feel free to contact me at (562) 945-9003 to answer any questions or for discussion.

Sincerely,


Andrea Gullo
Executive Director

Enclosure

Cc: Board of Directors
Advisory Committee

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SAN GABRIEL RIVER WATER COMMITTEE

729 N. Azusa Ave. #5
Azusa, CA 91702-2528
(COMMITTEE OF NINE) FOUNDED 1889

April 29, 2005

Comment Letter No. 14

Mr. Marty Moreno
Los Angeles County Dept. of Public Works
Watershed Management Division
P.O. Box 1460
Alhambra, CA 91802-1460

AZUSA AGRICULTURAL WATER
COMPANY

AZUSA VALLEY WATER
COMPANY

CALIFORNIA AMERICAN WATER
COMPANY

COVINA IRRIGATING COMPANY

MONROVIA NURSERY
COMPANY

Re: Draft EIR San Gabriel River Corridor Master Plan

Dear Mr. Moreno:

Thank you the opportunity to respond to the draft EIR. San Gabriel River Water Committee has had a representative attend County Master Plan meetings for years, in fact from the Master Plan's inception. We would like to think that comments made in the meetings have been recognized and incorporated into the Master Plan. Main San Gabriel Basin Watermaster has also had representatives in attendance at almost all meetings and their comments have been greatly appreciated. Following review of the draft EIR the Committee has the following comments:

14-1

On page 3-12 Section 3.3.1.2 It should be noted that storm water infiltration should only be considered if it can be shown that this process will not add contamination to the underground water supply. Also see Page 4.6-32 Projects that increase impervious surfaces or change drainage patterns encourage onsite collection of storm water for irrigation and percolation must be **consistent with water rights**.

14-2

On page 3-15 Table 3-7 Concept design studies should enhance Water Supply, Water Quality, Ground Water Recharge, Water Conservation and Flood Protection per Page 1-2 Section 1.2 Project Objectives, Executive Summary.


14-3

On page 3-20 Section 3.3.3.1 San Gabriel Canyon Spreading Grounds plans to include a floating island should proceed through a study and review period to assure no negative impacts to current operations.

Mr. Marty Moreno
April 29, 2005
Page 2

- 14-4** | On page 4.6-5 the average flow at Foothill Blvd. is listed as between 40 cfs and 100 cfs. This data may be accurate, but it should also be stated that there are storm release flow rates, such as this current winter, that exceeded 20,000 cfs. This information should be included so that plans can be formulated from actual flows, not just average figures.
- 14-5** | On page 4.6-8, Section 4.6.1.1 Other discharges lists San Gabriel Valley Municipal Water District's diversion as downstream of the spreading grounds, but in fact, the discharge point is into the northerly spread pit.
- 14-6** | On page 4.6-14 Section 4.6.1.3 Water Rights, Main San Gabriel Basin Water master lists parties who pumped in excess of 5,000 ac.ft. in fiscal year 2001-2002. City of Azusa has not been included on this list so please verify this info with Watermaster.

Sincerely,
SAN GABRIEL RIVER WATER COMMITTEE


Don Berry, Administrator

SAN GABRIEL RIVER WATERMASTER

FOR
CITY OF LONG BEACH ET AL VS SAN GABRIEL VALLEY WATER CO. ET AL
CASE NO. 722647-LOS ANGELES COUNTY

WATERMASTERS
GLENN A. BROWN
RICHARD A. RHONE
THOMAS M. STETSON

MAILING ADDRESS:
225 WEST BROADWAY
SUITE 400
GLENDALE, CA 91204-1331
TELEPHONE: (818) 244-0117
FAX: (818) 242-0480

April 19, 2005

Comment Letter No. 15

Mr. Marty Moreno
County of Los Angeles Department of Public Works
Watershed Management Division
P. O. Box 1460
Alhambra, CA 91802-1460

Subject: Draft Program Environmental Impact Report for the San Gabriel River Corridor Master Plan

Dear Mr. Moreno:

The San Gabriel River Watermaster has participated in the planning process for the San Gabriel River Corridor Master Plan. We offer the following comments regarding the EIR.

- 15-1** 1. We note the EIR recognizes the importance of existing use of the conveyance and conservation system for water supplies in the form of water rights, the need to make proper arrangements regarding the acquisition of water for new projects and protection of existing flood control capacities.
- 15-2** 2. **Water Rights.** The EIR indicates existing water rights will be protected. What is not conveyed in the document is that the great majority of the water rights are held by water purveyors who provide municipal water service in the region. Thus, this water is currently managed for the direct use of the people of the area. This water is stored in the groundwater basins and withdrawn at time of water demand by the purveyors for delivery to the users. The local water supplies provide less than half of the total municipal water use in the San Gabriel River area. Additional water is imported through statewide importation conveyance facilities. The value of this local water source cannot be underestimated in risk management of the local municipal water supplies. In a land of earthquake and drought, the availability of this local source of stored potable groundwater is of immense value.

**Draft Program Environmental Impact Report for the San Gabriel River Corridor
Master Plan**

April 19, 2005

Page 2

3. **15-3** | **Lario Creek.** The EIR should state that the existing gaging station on the Zone 1 Ditch must be maintained or replaced by a suitable station. This gaging station is extremely important in the operations of the San Gabriel Watermaster.

4. **15-4** | The groundwater spreading grounds need to be maintained. Maintenance requires periodic cleaning, clearing, disking and silt removal. We are concerned that development of the adjacent areas will reduce or prohibit the ability of the County to maintain the spreading grounds so that the existing percolation rates can be maintained.

We commend you on the preparation of the EIR document, especially considering all of the stakeholders and interests.

Very truly yours,



Richard A. Rhone
for San Gabriel River Watermaster

cc. Glen Brown
Steve Johnson
Tom Stetson



SAN GABRIEL VALLEY
MOSQUITO & VECTOR CONTROL DISTRICT

1145 N. Azusa Canyon Road
West Covina, California 91790
(626) 814-9466 • FAX (626) 337-5686
email: district@sgvmosquito.org

Steve West
District Manager

Kenn K. Fujioka, Ph.D.
Assistant Manager

Cities of:

Comment Letter No. 16

Alhambra

Arcadia

Azusa

Bradbury

Claremont

Covina

Duarte

El Monte

Glendora

Industry

Irwindale

La Puente

La Verne

Monrovia

Monterey Park

Pomona

Rosemead

San Dimas

San Gabriel

Sierra Madre

Temple City

Walnut

West Covina

County of
Los Angeles

April 25, 2005

Mr. Marty Moreno
County of Los Angeles Department of Public Works
Watershed Management Division
P.O. Box 1460
Alhambra, CA 91802-1460

**RE: DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT
FOR THE SAN GABRIEL RIVER CORRIDOR MASTER PLAN**

The San Gabriel Valley Mosquito & Vector Control District is a special district charged with protecting public health within approximately 250 square miles of the San Gabriel Valley, encompassing the upper reaches of the San Gabriel River and its tributaries. We take this responsibility very seriously. As such, we appreciate the opportunity to comment on the Draft Program EIR for the San Gabriel River Corridor Master Plan.

16-1

We were pleased to note that our concerns relating to habitat enhancement that may encourage or facilitate the reproduction of mosquitoes and other vectors capable of endangering public health were addressed in this document. As this is a Program EIR, project developers will be encouraged to coordinate with the vector control districts in their jurisdiction – a critical first step!

After careful review of the Draft EIR, we ask consideration of the following points: *(for ease of description, some sections have been reproduced below. Requested additions are typed in bold, text removals in strikeout, and notes to EIR editors in italics)*

SECTION 1 EXECUTIVE SUMMARY

16-2 Many significant points of clarification and requested amendments to **Section 2 – Section 5** are listed below. It is imperative that any changes to those sections are reflected in **Section 1.8** and **Tables 1-2 and 1-3** respectively.

SECTION 2 INTRODUCTION

16-3 Several agencies that have been participants in the Stakeholder process for the San Gabriel River Master Plan were inadvertently left off of **Table 2-1**.

Please add: California Department of Health Services under State Government
Please add: Greater Los Angeles County Vector Control District under County/Regional Governments

SECTION 2.7 AREAS OF KNOWN CONTROVERSY

16-4 The implementation of habitat enhancement projects along the San Gabriel River have the potential to increase risks to public health from a variety of vectors – not just mosquitoes (i.e. fleas, ticks, black fly, midges, and rodents) (*please note: the common name of the insect is correctly written as two separate words*) In addition, improving habitat for wildlife in close association to urban development increases the risk of vector-borne disease transmission to the public. *Please amend the third bullet point to read:*

- Potential impact on public health from increase in mosquito **and other vector** breeding conditions associated with the creation of constructed wetlands, **surface or underground stormwater capture/treatment devices**, other ~~surfaee~~ surface water features, **and corridor enhancement projects in close vicinity to urban development.**

SECTION 4.5 HAZARDS AND HAZARDOUS MATERIALS

16-5 As above, the introductory paragraph should be *amended to read:*

“Hazards and hazardous materials... public health hazards from insect **and other vector species**, ...”

SECTION 4.5.1.4 INSECT VECTORS

As above, many other arthropod and vertebrate species can be vectors of human disease or a source of significant discomfort. *Please amend this title to read:*

16-6 **4.5.1.4 Vectors of Public Health Concern**

The informational overview for this section inadequately addresses the seriousness of vector-borne disease transmission. *We recommend the text be amended as follows:*

~~Uncontrolled~~ Populations of ~~insect~~ vectors such as mosquitoes can pose a public health hazard by transmitting viruses and other disease-causing agents. In addition, ~~uncontrolled populations~~ of vectors can be a nuisance or source of **significant** discomfort for humans.

Division 3, Chapter 1 of the California Health and Safety Code defines a vector as any animal capable of transmitting the causative agent of human disease or capable of producing human discomfort or injury, including, but not limited to, mosquitoes, flies, mites, ticks, other arthropods, and rodents and other vertebrates.

California Health & Safety Code §2000-2067 gives mosquito and vector control agencies broad authority and substantial powers aimed at protecting public health. Parties responsible for any activity that supports the development, attraction, or harborage of vectors, or that facilitates the introduction or spread of vectors may be liable for civil penalties up to \$1,000 per day plus the cost of abatement.

**16-6
(Cont'd)**

The Master Plan Concept Design Studies and other future projects may include new or modified water features such as stormwater treatment wetlands. Mosquitoes are the vector of primary concern for the Master Plan, since they require aquatic habitats **for breeding to complete their lifecycle** and are known to transmit agents that cause disease in humans **and other animals. Wetlands attract mosquitoes as well as resident and migrant bird species perpetuating bird-mosquito disease transmission cycles. Infected mosquitoes can disperse up to ten miles (depending on species) from these aquatic habitats into adjacent residential neighborhoods thereby increasing disease risks to surrounding communities and the visiting public.**

Additional **aquatic** vectors of concern for the Master Plan are **black flies** and midges, which also require aquatic habitats for breeding and ~~can be~~ **are** a **public** nuisance. ~~However,~~ In the U.S., **black flies** do not generally carry disease-causing agents **to humans, however painful bites from some species can cause extensive swelling, allergic reaction, and secondary infection. Most midges do not bite, however, large populations are known to cause allergic reactions and have negative economic impacts on local residents and businesses.**

Finally, various rodent and larger wildlife species and the parasites they harbor can cause disease in humans and other animals. In California, over 45% of human diseases reportable to the California Department of Health Services are diseases of animals transmissible to people (zoonoses) (Los Angeles Department of Health Services Zoonoses Manual Updated: 1/6/2005, available at:

<http://search.ladhs.org/vet/guides/vetzooman.htm#Zoonoses%20Wildlife>).

Increasing corridor/habitat connections will, by design, increase movement and dispersion of wildlife adjacent to and into urban areas thereby increasing human-wildlife interactions and disease transmission risks to the public.

Vector control **and disease surveillance** in the Master Plan study area is carried out by three vector control districts, ~~and the City of Long Beach Vector Control Program, and Los Angeles County Department of Health Services, Vector Management Program.~~ ~~which are agencies created under the California Health and Safety Code.~~ The vector control agencies and their respective service areas within the Master Plan study area are listed below and shown in **Figure 4.5-1**:

Please include the following agency in table 4.5-1

- **County of Los Angeles Vector Management Program – entire county area.**

(the information below relating to WNV has been updated)

Mosquitoes. In California, there are several species of mosquitoes known to transmit agents that cause mosquito-borne diseases, such as **West Nile virus**, western equine encephalomyelitis, St. Louis encephalitis, and malaria. **The primary mosquito species in urban Los Angeles County responsible for disease transmission to humans (*Culex spp.*) are also the most abundant and are considered ‘bridge vectors’ due to their predilection for biting both birds and humans thereby serving to vector avian encephalitis-causing viruses to humans.**

Since the introduction of the West Nile virus into the Western Hemisphere in 1999, this mosquito-borne virus has spread ~~to most of~~ **throughout** the continental United States, with human cases detected in 47 states and the District of Columbia (CDC, 2004). According to the California Department of Health Services (CDHS), ~~612~~ **830** human cases ~~have been~~ **were** reported in California in 2004, ~~(as of March 17, 2005),~~ including ~~245~~ **331** cases in Los Angeles County and ~~36~~ **64** cases in Orange County. **In 2004, there have been 17** were 28 West Nile virus-related fatalities ~~to date~~ in California (in Los Angeles, Orange, San Bernardino, Riverside, Glenn, **Kern, and Tehama** counties) (CDHS, 2004). According to the ~~CDHS~~ **CDC** (2004), Most people who are bitten by a mosquito ~~with~~ **carrying** the West Nile virus will not become ill. People who do ~~become ill~~ may experience ~~mild to moderate~~ **to significant flu-like illness exhibiting** symptoms such as fever, rash, headache and body ache **with symptoms lasting a few days to several weeks.** It is estimated that less than 1 percent of the people who are infected with the virus become severely ill and require hospitalization. **Severe illness often results in long-term or permanent neurologic**

16-6
(Cont'd)

damage and can be fatal. The elderly and people with compromised immune systems are particularly susceptible to severe illness caused by the virus. **West Nile virus and other encephalitis-causing viruses are endemic to California and will continue to be transmitted and cause disease in humans and other animals.**

Mosquitoes require standing water to breed and complete the life cycle, which takes about 7 days during warm weather. Mosquito control methods include elimination of potential breeding sources through water and vegetation management, **public education and source reduction**, and the use of biological controls and chemical insecticides, **and legal abatement (California Health & Safety Code §2000-2067).**

Water and Vegetation Management. Water and vegetation management to minimize areas of stagnant water **and improve water quality are** the first considerations for mosquito control in constructed wetlands and other water features. Overgrowth of emergent vegetation (e.g., cattails), which can create stagnant water around the margins of constructed wetlands and lakes, can be prevented by periodic removal of vegetation, **the use of herbicides**, and/or by managing water depth and flow patterns. In addition, water motion can be encouraged by allowing the water to be exposed to wind, altering water depth, and/or by controlling flow patterns.

For example, the 45-acre San Joaquin Marsh on San Diego Creek (Orange County) was designed so that portions of the marsh can be drained selectively, and a system of water pumps and weirs are used to manage the water levels for mosquito control (Denger and Brandt, pers. comm., 2003). At the Rio Hondo Coastal and San Gabriel Coastal Spreading Grounds, LADPW removes vegetation periodically to minimize areas of stagnant water. **While helpful, these solutions do not mitigate all mosquito problems and routine mosquito surveillance and control is required. In addition, densely vegetated areas (such as the San Joaquin Marsh) often require adult mosquito suppression due to the large numbers of mosquitoes produced (pers. comm. Richard Meyer, OCVCD, 2005).**

Mosquitofish. Mosquitofish (*Gambusia affinis*) are small, guppy-like fish that feed on mosquito larvae, and are stocked in ponds, lakes, and other water features as a safe and effective **biological mosquito control method.** ~~However,~~ **Some research indicates that** mosquitofish may disrupt the aquatic ecosystems if introduced into natural streams, lakes, or ponds, **however the alternative need for increased chemical control measures must be weighed if their use is questioned.**

Enhancing populations of natural aquatic mosquito predators (dragonfly & damselfly larvae, aquatic beetles, native fish) in lieu of mosquitofish, although beneficial, will not suffice to mitigate mosquito concerns. Although mosquitofish are present throughout the U.S. in natural bodies of water, many Districts advocate only placing mosquitofish in closed systems to alleviate potential concerns.

16-6
(Cont'd)

16-6
(Cont'd)

Bti/Bs. *Bacillus thuringiensis* var. *israelensis* (Bti) and *Bacillus sphaericus* (Bs) and ~~is a~~ **are naturally occurring soil-borne** bacteria that affect the digestive systems of mosquito larvae, and ~~is a~~ **are** commonly used larvicides. Bti/Bs can be broadcast onto the water surface by a hand crew or from a vehicle ~~or~~ boat, depending on environmental conditions and site access. Bti/Bs is ~~species-~~highly specific and does not pose risks to wildlife, non-target species, or the environment (EPA, 2002a).

Methoprene. Methoprene is a mosquito juvenile growth hormone mimic that **artificially extends the larval stage of mosquitoes and prevents normal maturation to adulthood.** Methoprene is often used in larval mosquito control (sometimes in combination with Bti) and is a **highly specific, targeted option for mosquito control.** Methoprene has the added benefit of **maintaining mosquito larvae as a food source for native fish and invertebrates while still fulfilling public health objectives.**

Although other products are available for immature mosquito control, the above are the most environmentally sensitive and most likely to be used in naturalized systems in the Los Angeles basin.

Adult Mosquito Control. When the above ~~non-chemical~~ control measures are infeasible or ineffective for reducing the adult mosquito population, adulticides (chemicals used to control adult mosquitoes) may be used. Chemical adulticides are applied by **hand-held**, truck-mounted, or aircraft-mounted sprayers ~~near population centers~~. Chemical adulticides are not species-specific and can have adverse effects on non-target insects. In addition, **both larvicide and adulticide** applications of ~~chemical agents~~ can lead to resistance in the vector population. A **sometimes suggested** biological control method for adult mosquitoes is installation of nesting or roosting houses to attract insectivorous bats or birds that feed on adult mosquitoes. **This option has very limited overall value and may artificially increase bat populations risking rabies transmission in Los Angeles and Orange Counties.**

Black flies. Black flies are common in the San Gabriel Valley, but are not known to transmit **human** disease locally. They can, however, be a nuisance by causing **allergic reaction**, discomfort and irritation to humans due to their biting habits and/or presence in large numbers (i.e., flying into eyes, ears, and noses). In two of the three species that are locally present, females will bite mammals, including humans. Black flies breed in oxygenated, flowing water, such as dam spillways, rivers and streams with rocky beds, and pipe seepages. Black fly populations are present ~~during spring, summer, and fall~~, **throughout the year**, peaking in late spring and summer.

Black fly control is typically performed on larvae **immature stages** rather than adults. The primary method is to interrupt the flow of water for 24 to 48 hours so that the larvae are deprived of oxygen and/or desiccate. If this is not feasible or

ineffective, Bti may be applied. For example, at the San Gabriel Canyon Spreading Grounds, the SGVMVCD works with LADPW to periodically shut off the outflow from Morris Dam during weekends to dry out black fly larvae. This allows the District to minimize the need to apply Bti (Fujioka, pers. comm., 2003). Black fly adults tend to be difficult to **control** eradicate because they resist airborne pesticide (SGVMCD, 2003a).

Midges. Midges are widespread in the San Gabriel Valley. Though they are often confused with mosquitoes, midges do not bite or cause disease **but may contribute to allergies and large populations can result in economic impacts**. Midges can be found hovering in swarms on warm summer evenings. ~~Like black flies,~~ They breed **standing and flowing waters, and prefer the water can often be found in watercourses and storm drain systems.** ~~In the San Gabriel Valley,~~ **Throughout the Master Plan area,** control measures are undertaken when there are extremely high numbers of adult insects. The larvicidal agents used for mosquito control are also **generally** effective for midges (SGVMCD, 2003a).

We request the addition of the following section:

16-6
(Cont'd)

Fleas, Ticks, and other Vectors of Concern. Changes in vertebrate and invertebrate populations through either natural or man-made perturbations threaten to increase public health risks. In California, 45% of the 83 human diseases reportable to the California Department of Health Services are zoonotic (animal diseases transmittable to people). Many of these diseases are present in southern California, require diligent monitoring, and in many instances have resulted in human disease.

High raccoon densities in urban environments (a result of abundant anthropogenic food sources) increase the risk of transmission of raccoon roundworm (*Baylisascaris procyonis*). This is a density dependent disease and the cause of serious or fatal larval migrans in humans and animals.

Lyme disease (LD) is a significant vector-borne disease in California, and although rare in Los Angeles County, has been identified (LACDHS, 2004). The tick species responsible for its transmission is found in our local foothills. The predominant host of larval ticks (*Peromyscus spp.*) commonly inhabit disturbed or transitional coastal sage scrub habitat. Both larval and adult ticks are capable of traveling into urban areas via animal movements. Researchers in Maryland found a strong correlation between increased LD risk and vegetative corridors through urban development (Frank, et.al, 2002).

(Reference: Frank C, Fix AD, Peña CA, Strickland GT. 2002. Mapping Lyme Disease Incidence for Diagnostic and Preventive Decisions, Maryland. Emergin

Infectious Disease, April 2002 Vol.8, No.4: 427-429. Available at URL: www.cdc.gov/eid.)

16-6
(Cont'd)

Probably of greater concern is the risk of plague and murine typhus in southern California. Plague is detected in Los Angeles County wildlife nearly every year with ground squirrels (and their associated fleas) being the most important source of human exposure. Although rare, human plague cases do occur in this area (LACDHS, 2000). A suburban cycle of murine typhus has been identified involving opossums, rat fleas, and cats that is readily transmittable to humans. Ten human cases were reported on average each year from 1993-2002 (Ramirez, 2003).

(Reference: Ramirez, Joe. 2003. Murine (Endemic) Typhus in Los Angeles County. Mosquito & Vector Control Association Southern Region Continuing Education Program: #03-00240).

Increasing interactions (and disease transmission) between wildlife, domesticated animals, and humans is of growing concern in urban and suburban areas. Surveillance and control methods vary and are typically undertaken if disease activity is detected and the public's health is at risk. Reducing human-wildlife interactions are best accomplished by discouraging overpopulation due to abundant food and water resources and with extensive educational outreach geared towards reducing "keeping wildlife wild".

4.5.2 SIGNIFICANT CRITERIA

Please edit the last bullet point to read:

16-7

- Created insect-vector breeding conditions in an amount that would require increased levels of mosquito **and other vector** abatement programs to **control** maintain mosquito vector populations at pre-project **below** levels at which public health may be at risk

4.5.3 IMPACTS OF ADOPTING THE MASTER PLAN ELEMENTS

16-8

In the second paragraph, second sentence, *please edit to read* "mosquito **and other vector** breeding areas **habitats and creation of ecological habitats** conducive to mosquito-borne disease **propagation**... that retain water (...) or increase animal movements into urban areas"

16-9

*** Please Note: Although we truly appreciate the considerations in the current Draft EIR to the public health issues raised, we are concerned that any and all mitigation*

16-9
(Cont'd)

measures still may not reduce potentially significant impacts to less than significant as outlined. In addition, environmental conditions beyond our control routinely increase risks of vector-borne disease to humans and can not be truly factored into this equation.

Table 4.5-2

Habitat Element section: the “Potentially Adverse:” section *must be updated* to identify the other vector-borne disease and corridor enhancement concerns noted above.

Also add: Under the California Health and Safety Code Division 3, Chapter 1 §2000-2067, parties responsible for any activity that supports the development, attraction, or harborage of vectors, or that facilitates the introduction or spread of vectors may be liable for civil penalties up to \$1,000 per day plus the cost of abatement.

In addition, the information related to vector potential should be a separate and distinct paragraph not tied to the bird/wildlife strike hazard information.

16-10

Open Space Element: *please incorporate the following information* into the “Potentially Adverse” section:

Increasing open space elements within the urban matrix has the potential to increase vector populations and human-wildlife interactions within and surrounding these projects.

Flood Protection Element: *please incorporate the following information* into the “Potentially Adverse” section:

Please edit the first sentence in the third paragraph to read: “Projects with constructed wetlands... and other **above and below ground** facilities designed...~~ould~~**would** impact on public health in violation of California Health and Safety Code §2000-2067.”

Water Supply and Water Quality Element: *please incorporate the following information* into the “Potentially Adverse” section:

The second sentence of the second paragraph should be *amended to read:* “Maintenance activities...sediments **and potentially large amounts of aquatic vegetation...**”

16-11

4.5.4.1 HAZARDOUS MATERIALS

Disposal of Sediments...

Please amend sentence three to read: “Maintenance activities...removal of sediments **and aquatic vegetation...**”

4.5.4.2 BIRD/WILDLIFE AIRCRAFT STRIKE HAZARD

16-12

The assumption that bird populations would not substantially increase in areas where wetland habitat is created must be reevaluated. Birds, especially migratory waterfowl, will take advantage of newly created habitat due to the critical foraging opportunities they will afford. One needs only review data for the Salton Sea, and Whittier Narrows areas for examples.

4.5.4.3 INSECT VECTORS

Please amend this heading to read: “Vectors of Public Health Concern” for uniformity with Section 4.5.1.4

16-13

This section discusses only “uncovered” stormwater detention devices that may be utilized at project sites. *This EIR must also specifically address “covered” or underground stormwater capture and treatment devices* as they are a very commonly selected in urban development and may be considered for many projects incorporating buildings and facilities into their project. These units additionally pose risks to public health as many are designed to hold water in a vault or sump unit indefinitely until pumped annually or bi-annually during routine maintenance. These devices have the potential to breed tremendous numbers of mosquitoes and pose significant risks to public health.

In addition, although your review found that many of these “uncovered” stormwater retention facilities pose low risks for mosquito reproduction, we ask you to review the following documents.

Managing Mosquitoes in Stormwater Treatment Devices, Publication 8125, 2004.

Managing Mosquitoes in Surface-Flow Constructed Treatment Wetlands, Publication 8117, 2003.

Both are available online at <http://anrcatalog.ucdavis.edu>.

Supporting research can also be provided that shows many devices *designed* to drain rapidly, or rarely hold water, often fail to drain as designed and breed tremendous numbers of mosquitoes as a result of the routinely high nutrient/organic content of stormwater runoff. We ask you to seriously reconsider the vector potentials of both covered and uncovered stormwater treatment devices.

16-14

Catch Basins. *Please edit the second sentence to read: “Catch basins are typically ~~must be~~ designed so that all runoff...”*

16-15

Shallow depressions... *Please edit the third sentence to read: “During large storms... ~~but would likely~~ must be designed to infiltrate into the ground*

16-15
(Cont'd) **within 72 hours.** ~~In addition, stormwater would be present primarily in winter, when mosquitoes are less active. (note: we have various species of mosquitoes that breed and appear to transmit WNV year-round in southern California)~~ **Irrigation in the vicinity has the potential to maintain standing water in these basins for extended periods of time.**

*Please replace the last sentence with: **Improperly constructed or poorly managed depressions have the potential to create mosquito-breeding conditions.***

16-16 **Retention Basins.** *Please remove the second and third sentences as this is often not the case. The next sentence should read: “In the event... periods. depending on the basin capacity* **Additionally, inadequately sloped edges have the potential to support dense growths of emergent vegetation unless properly maintained.”** In the last sentence, please replace “some” with “the”.

16-17 **Stormwater Wetlands.** *Please amend the second sentence to read:* “~~However, in some areas,~~ **Regardless, ... wetland vegetation, pump failure, or problems with design or maintenance.** Therefore, stormwater wetlands have some significant potential...”

16-18 **Permanent Lakes.** *Please add the following sentence to the end of paragraph one: “**Lakes and ponds with shallow sloped edges will support vegetation which is conducive to mosquito reproduction and can make control measures ineffective if too dense.**”*

16-19 *** Please Note: Any and all possible mitigation measures still may not reduce potentially significant impacts to less than significant as outlined. In addition, environmental conditions beyond our control routinely increase risks of vector-borne disease to humans which can not be truly factored into this equation (i.e. new pathogen introductions such as WNV, and weather).*

16-20 *Please remove sentence two in paragraph three and replace with: **Breeding of any vectors of public health significance as defined in California Health and Safety Code Division 3, Chapter 1 §2000-2067 is a public nuisance.***

16-21 In the final paragraph in this section, it might be good to note yellow jackets, fleas, ticks, and wild rodents into the list of wildlife hazards.

16-22 **4.5.5.2 INSECT VECTORS.** *Please amend this heading to read: “**Vectors of Public Health Concern**” for uniformity with Section 4.5.1.4*

16-23

In the last sentence of the introductory paragraph, *Please replace* “insect” with “all”

MP-H1 please replace “district” with the more appropriate term “agency” in the first sentence.

- *Please amend bullet one to read:* “Design to... stagnant water **as specified by the vector agency. Ensure slope characteristics are such that dense stands of emergent vegetation will not develop.** (Perhaps a reference here to *Managing Mosquitoes in Surface-Flow Constructed Treatment Wetlands* referenced above)
- *Please amend bullet three to read:* “Work with... mosquito-eating fish...”
- *Please amend bullet four to read:* “Provide... site access to **vector control agency specifications...**”
- *Please eliminate this bullet.* This is an unsound solution that may in itself pose public health risks from diseases such as rabies. Enhancement of habitat quality will result in increased natural predator populations that are within the carrying capacity of the environment to support.
- *Please add a bullet to read:* “**Stormwater retention facilities/devices must be designed to drain completely within 72 hours and be equipped with the ability to be dewatered rapidly if needed.**”
- *Please add a bullet to read:* “**Incorporate measures into project designs that serve to educate the public about wildlife safety and vector-borne disease issues, prevent wildlife-human interactions, and prevent wildlife access to trash and unnatural food and water sources that are likely to result in unnatural population levels.**”
- *Please edit the last bullet to read:* “Incorporate... project funding or ~~develop a plan for~~ **implement a secure and** reliable funding source for vector management activities **through the life of the project.**”

16-24

CD-H1 *Please amend bullet points as in MP-H1.*

SECTION 4.6 HYDROLOGY AND WATER QUALITY

16-25

As noted above, any project utilizing stormwater capture devices or treatment options that hold water longer than 72 hours risk breeding mosquitoes and endangering public health. The California Health and Safety Code Division 3, Chapter 1 §2000-2067, states that parties responsible for any activity that supports the development, attraction, or harborage of vectors, or that facilitates the introduction or spread of vectors may be liable for civil penalties up to \$1,000 per day plus the cost of abatement. These concerns should be addressed or cross referenced with the information provided above.

SECTION 4.9 PUBLIC SERVICES AND UTILITIES

Implementation of projects in the Master Plan will impact mosquito and vector control districts in the following way:

16-26

- Underground utility vaults (for cable, telephone, & electricity) mandated by current FCC regulations often retain standing water and breed mosquitoes thereby risking public health (pers. comm. Charles Myers, CA DHS, 2005) (*I also have a CA DHS study from 1975(?) that I can provide as reference*). This concern must be addressed in this section.

SECTION 5.3 CUMULATIVE IMPACTS

The recent increase in both public support and funding to restore watersheds, increase open space, and improve habitat connectivity has triggered interest in a regional approach to planning and project implementation often spanning various jurisdictions and involving many entities. These efforts will most certainly result in more successful projects but will require a more thorough evaluation of all possible implications.

16-27

- **Section 5.3.2.4** incorrectly states that none of the related projects (not included in the Master Plan) identified would create mosquito habitat. Projects (outlined in the Master Plan, and related) will incorporate either above ground water features and/or below ground stormwater treatment devices (as required by law for projects larger than 1 acre). *Therefore, there is a potential for cumulatively considerable risks to the public's health due to vector reproduction and disease transmission resulting from the implementation of the Master Plan.*
- In California, over 45% of human diseases reportable to the California Department of Health Services are diseases of animals transmissible to people (zoonoses). Increases in habitat quality and connectivity may pose *cumulatively considerable risks to public health resulting from increased animal movement into and through densely populated urban areas.*

As requested in the Notice of Document Availability, the contact for further inquiries related to the above mentioned Comments on the Draft EIR for the San Gabriel River Corridor Master Plan is:

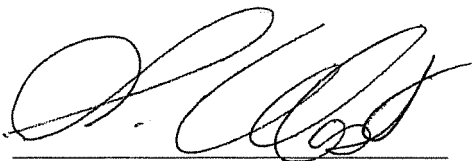
Kelly Middleton
Public Information Officer
San Gabriel Valley Mosquito & Vector Control District
1145 N. Azusa Canyon Road
West Covina, CA 91790
626.814.9466
kmiddleton@sgvmosquito.org

**DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
SAN GABRIEL RIVER CORRIDOR MASTER PLAN**

SIGNATURE PAGE

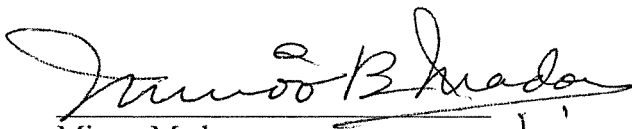
I, Steve West, District Manager of the San Gabriel Valley Mosquito and Vector Control District, do hereby certify the foregoing Response to the Draft Environmental Impact Report for the San Gabriel River Corridor Master Plan.

We are interested in assisting the County of Los Angeles Department in achieving its goals while providing maximum protection to the public's health. We appreciate the opportunity to provide input in this process and are available for consultation and request the opportunity to participate and serve on future committees



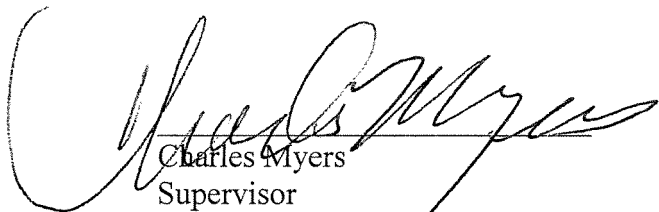
Steve West
District Manager

05/04/05
Date



Minoo Madon
Scientific Technical Services Director
Greater Los Angeles County Vector Control District

05/05/05
Date



Charles Myers
Supervisor
California Department of Health Services
Vector-Borne Disease Section

5/29/05
Date

Rydman, Rama

From: Alarcon, Christian [CAlarcon@lacsds.org]
Sent: Thursday, May 05, 2005 2:02 PM
To: Moreno, Martin
Cc: Rydman, Rama; Rincon, Martha; Gasca, Monica
Subject: Comments on Draft San Gabriel River Corridor Master Plan

Marty,

Comment Letter No. 17

The following presents the Districts' comments on the Draft San Gabriel River Corridor Master Plan and Draft Program Environmental Impact Report.

Comments on Draft San Gabriel River Corridor Master Plan

17-1 The Districts request that the plan refer to the "County Sanitation Districts of Los Angeles County" or "Sanitation Districts".

Section 2.3.1 Biological and Physical Resources

- 17-2** • Page 2-34: The second paragraph under the Spreading Grounds heading states that "the quantity of reclaimed water used for recharge each year is governed by waste discharge permits." This statement should be corrected to say that recharge is governed by water reclamation requirements.
- 17-3** • Page 2-37: The Districts believe that the available reclaimed water flow shown on Map 2-11 should be corrected for the Pomona WRP. As discussed on Page 2-38, nearly 100% of the reclaimed water is used either for direct reuse or for groundwater recharge. The Pomona WRP flow should be listed as zero to be consistent with the flow shown for the Whittier Narrows WRP, which also reuses nearly 100% of the flow. Also, the spreading ground should be labeled on the map.
- 17-4** • Page 2-38: The Districts would like to clarify that the Pomona WRP discharges to the South Fork San Jose Creek, which is tributary to the San Jose Creek.
- Page 2-42: The beneficial uses for the Main Stem of the San Gabriel River (Unit 405.43) in Reach 2 do not include the Wetlands Habitat use. It should be changed to Spawning use.
- 17-5** • Page 2-42: The beneficial uses for the San Gabriel River (Unit 405.41) in Reach 4 should include the Warm Freshwater Habitat use as an intermediate use.
- Page 2-42: The beneficial uses listings are not consistent with Table 4.6-9 of the Draft Program Environmental Impact Report (page 4.6-18).
- Page 2-44: The impaired reaches listings are not consistent with Table 4.6-13 of the Draft Program Environmental Impact Report (page 4.6-24).

Section 3.7.2 River Corridor Policies and Programs

- 17-6** • Page 3-40: The Districts request that the caption for Figure 3-48 be corrected. It should read, "San Jose Creek Water Reclamation Plant".

Section 3.8.2 Woodland Duck Farm

- Page 3-59: The Districts request that Map 3-13 be corrected. The label referring to the use of reclaimed water at the golf course should read, "San Jose Creek Water Reclamation Plant".

Section 3.8.4 Lario Creek/Zone 1 Ditch

- 17-7** • Page 3-64: The second paragraph under the Opportunities heading describes the Zone 1 Ditch as "a functional, human made 85-mile waterway." The Districts do not believe that the waterway is 85-miles long and should be corrected.

17-8

- Page 3-65: The second paragraph under the Design Concepts heading should include a reference to the "San Jose Creek Water Reclamation Plant".

17-9

- Pages 3-66 and 3-67: The Districts request that Maps 3-16 and 3-17 for the Lario Creek Concept Design include the Whittier Narrows WRP discharge pipeline from the treatment plant to the San Gabriel River. The construction plans showing the location of this pipeline have been presented to North East Trees.

Section 3.8.5 El Dorado Regional Park

17-10

- Page 3-69: The last paragraph under the Challenges heading states that "using reclaimed water coming directly from the treatment plant is not acceptable for lakes that are stocked with fish, according to U.S. Department of Fish and Game standards." The Districts are unsure as to what Department of Fish and Game guidelines the document is referencing and request that this be clarified.

17-11

- Page 3-69: The second paragraph under the Design Concepts heading states that "reclaimed water would need to be pumped up into the wetlands area to be cleansed of nutrients before flowing into the second lake." The WRPs consistently comply with NPDES limits for nutrients, which are intended to protect all beneficial uses. Wetlands do provide additional nitrogen removal that could improve water quality but not because it is necessary.

17-12

Section 4.9 Flood Channel Enhancements

- Page 4-21: The first paragraph under the Spreading Grounds heading should clarify that the San Gabriel Canyon Spreading Grounds are located in Azusa.

Comments on Draft Program Environmental Impact Report

17-13

The Districts maintain facilities along the San Gabriel River that may be affected by individual projects proposed in the Draft San Gabriel River Corridor Master Plan. Approval to construct improvements within a Districts' sewer easement and/or over a Districts' sewer is required before construction may begin. The Districts request to review proposed projects in order to determine whether or not Districts' truck sewers will be affected.

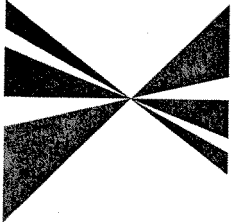
17-14

Section 4.6.1.1 Surface Water Features

- Page 4.6-9: The Districts request that Table 4.6-4 be corrected. The Pomona WRP permitted capacity should be identified as 15 MGD and not 13 MGD. The Pomona WRP discharges to South Fork San Jose Creek, which is tributary to San Jose Creek. The San Jose Creek WRP can also discharge to the San Gabriel River, downstream of the confluence with San Jose Creek, as well as in San Jose Creek. Footnote 1 for Table 4.6-4 should also be corrected to state that the San Jose Creek WRP can discharge to the San Gabriel River.

Christian Alarcon
Civil Engineer
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County Sanitation Districts of Los Angeles County
Phone: (562) 699-7411, Ext. 2814
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SOUTHERN CALIFORNIA



ASSOCIATION of GOVERNMENTS

WMD
DBS

May 6, 2005

Mr. Marty Moreno
County of Los Angeles Department of Public Works
Watershed Management Division
P. O. Box 1460
Alhambra, CA 91802-1460

Comment Letter No. 18

RE: SCAG Comments on the Draft Program Environmental Impact Report for the San Gabriel River Corridor Master Plan - SCAG No. I 20050137

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Orange County Transportation Authority: Lou Morea, County of Orange

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Keith Millhouse, Moorpark

Dear Mr. Moreno:

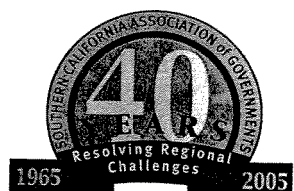
Thank you for submitting the Draft Program Environmental Impact Report for the San Gabriel River Corridor Master Plan to the Southern California Association of Governments (SCAG) for review and comment. SCAG's responsibility as the region's clearinghouse per Executive Order 12372 includes the implementation of California Environmental Quality Act (CEQA) §15125 [d]. This legislation requires the review of local plans, projects and programs for consistency with regional plans.

It is recognized that the proposed project area is a 1-mile wide corridor along 58 river miles of the San Gabriel River that includes 19 cities as well as unincorporated areas of Los Angeles and Orange counties, and encompasses a total of approximately 58 square miles. The Master Plan is a consensus-based document that recognizes and addresses a renewed interest in recreation, open space, and habitat, while also seeking to enhance and maintain flood protection, water conservation benefits, along with existing water rights.

SCAG staff has evaluated your submission for consistency with the Regional Comprehensive Plan and Guide (RCPG) and the Regional Transportation Plan (RTP). Section 6.3 of the DEIR provides a thorough discussion of the proposed Project's lack of conflict with the Air Quality Management Plan, and its consistency with local zoning and general plans, and the SCAG Regional Comprehensive Plan and Guide (RCPG). In addition, Table 6-3 cites SCAG's RCPG policies with side by side corresponding project consistency statements.

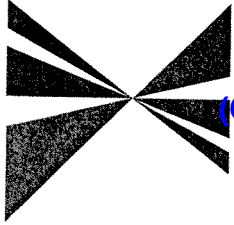
We sincerely appreciate your thorough review of SCAG's regional guidelines and the accompanying discussion of your project's consideration as well. This approach to discussing consistency or support of SCAG policies is commendable and we appreciate your efforts.

18-1



May 6, 2005
Mr. Marty Moreno
Page 2

SOUTHERN CALIFORNIA



**ASSOCIATION of
GOVERNMENTS**

18-1
(Cont'd)

Based on the information provided in the Draft EIR, we have no further comments. A description of the proposed Project was published in the April 1-15, 2005 Intergovernmental Review Clearinghouse Report for public review and comment.

If you have any questions, please contact me at (213) 236-1852. Thank you.

Sincerely,

April Grayson
Associate Regional Planner
Intergovernmental Review

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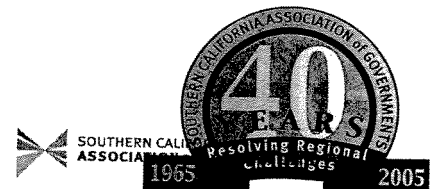
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Orange County Transportation Authority: Lou Ippolito, County of Orange

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Keith Millhouse, Moorpark



May 4, 2005

Maryann Reyes
Director of Public Affairs

Comment Letter No. 19

Mr. Marty Moreno
Watershed Management Division
Department of Public Works
County of Los Angeles
900 South Fremont Ave.
Alhambra, CA 91803

SUBJECT: Southern California Edison Company Comments on the San Gabriel River Corridor Master Plan Draft Program Environmental Impact Report (March 2005)

Dear Mr. Moreno:

On behalf of Southern California Edison Company (SCE), I am pleased to submit the comments contained herein in response to Los Angeles County's San Gabriel River Corridor Master Plan Draft Program Environmental Impact Report (DEIR) dated March 2005. We appreciate the opportunity to submit comments on this important effort.

19-1 SCE, the County of Los Angeles, and other involved parties have worked well together over the years on projects of mutual interest along the river corridor and SCE rights-of-way and which are compatible with SCE's vital operating system requirements. SCE owns or controls a significant portion of the property along the entire San Gabriel River corridor; its primary use is for SCE's operating systems, transmission lines and related facilities. Just as with critical lands the County owns and manages for important public facilities and infrastructure, SCE must be equally protective of its critical operating system property.

SCE is committed – in the future as it has been in the past – to working closely with the County and other parties to consider compatible and appropriate uses within its rights-of-way. Some projects (described below) are viable and fit well with SCE's system operating requirements. Other projects, however, may not be suitable for or compatible with SCE's property and its operating requirements. In either case, SCE urges project proponents to communicate early in the conceptual planning stage to ensure a project is appropriate for the site, and work in close collaboration with SCE thereafter to ensure a successful outcome for all involved parties.

SCE's comments to the Master Plan and DEIR are divided into three sections: 1) SCE's Operating System and Secondary Land Use Program Objectives, provided for background; 2) SCE's and Los Angeles County's Shared Goals for a Balanced River Plan; and 3) SCE's Recommended Revisions to specific sections of the Master Plan

and DEIR. The comments contained herein supersede those SCE submitted on any previous documents related to the Master Plan or related environmental documents. We anticipate that comments SCE submits to either the Master Plan or DEIR will be reflected consistently in the final versions of both documents.

1) SCE's Operating System Needs and Secondary Land Use Program Objectives.

SCE's rights-of-way along the San Gabriel River corridor and throughout its entire 50,000-square-mile central, coastal, and southern California service territory are the backbone of its electrical power operation and transmission system and are vital to providing electric service to hundreds of communities and millions of customers. The safe and reliable operation of its electrical system is SCE's paramount responsibility and obligation. With demand for electricity increasing throughout southern California and the entire state, and with increasing state legislative and regulatory requirements imposed upon us to meet that increasing demand, SCE must meet its stewardship and regulatory obligation to ensure that its existing rights-of-way corridors are available for safe and efficient operation of these transmission lines and future expansion of its facilities and electric transmission lines.

19-2

SCE is committed to a balance of uses within our rights-of-way to help SCE and the County achieve our respective goals. SCE's Secondary Land Use Program – where certain low-intensity, non-utility uses are allowed in compatible locations within our rights-of-way – has been in existence for over 50 years. Though it involves a relatively small proportion of SCE's total operating property, this program was established to benefit our ratepayers by lowering our operating costs and, where possible, to produce from third parties extra revenue that may offset still more costs, and thereby help keep SCE's electric rates lower than they otherwise could be.

SCE's Secondary Land Use Program objectives are designed to achieve a balance of uses, in particular low-intensity, green/passive recreational uses, and low-intensity economic development uses that can provide desirable and viable benefits for local residents, neighborhoods and communities, as well as to SCE and its ratepayers. SCE's Secondary Land Use Program is guided by California Public Utilities Commission regulations (General Order No. 69-C), which define the need to protect utility system operations, and provide guidance on overall uses of the right-of-way, the types of agreements allowed, and related provisions.

2) SCE and Los Angeles County's Shared Goals Support a Balanced San Gabriel River Master Plan.

SCE and Los Angeles County share many common goals for secondary uses of SCE's property along the San Gabriel River. The County has articulated a number of proposed projects in the draft Master Plan and DEIR, many of which are compatible with SCE's requirements, but some of which may not be suitable and are described in the next section. To ensure full understanding and further the spirit of cooperation, SCE and the County should discuss why certain projects may not be compatible.

19-3

Based on SCE's operating requirements and obligations, appropriate and compatible uses generally include the following:

- Low-Intensity, Green/Passive Recreational Uses, such as horticultural and agricultural; parks; and hiking and non-motorized biking trails
- Low-Intensity Economic Uses, such as vehicle, boat and recreational vehicle parking; material, equipment and self-storage; and light industrial facilities

In addition to SCE's approach, key elements of the County's Master Plan and DEIR support this collaborative and balanced approach. That language states that the "Master Plan was intended to respond to three major goals of habitat, recreation and open space identified by the County of Los Angeles Board of Supervisors... as well as the need for economic development..."

There are approximately 393 acres of property along the river corridor that SCE owns in fee or for which it has acquired an easement. It is important to note that the terms of our easements usually impose restrictions on the other uses to which the property's fee owner may put that property, again to preserve SCE's operational access to the property and the potential need to develop new facilities. According to the County's draft Master Plan and DEIR, SCE owns or leases approximately 85 percent of the open space land along the San Gabriel River. Certain sites on SCE's rights-of way may be compatible with and appropriate for low-intensity, green/passive recreational uses, while others may be compatible with and appropriate for low-intensity economic uses, which can also possibly include some limited portion of the property for hiking and biking trails, trail access points and other green/recreational uses where appropriate and compatible.

To assist in project conceptual design and planning, and moreover to ensure projects are compatible with SCE's rights-of-way and system operating requirements, SCE has developed the document enclosed with this letter entitled, "Southern California Edison Rights-of-Way Constraints Guidelines." The Guidelines are designed to provide overall guidance and specific design criteria that should be factored into any proposed project. SCE encourages those who wish to propose projects within SCE rights-of-way to review the Guidelines early; SCE further requires that project proponents meet with SCE early in the project conceptual stage. Such an early collaborative approach will help in the planning and project development process and will also more likely ensure project success.

SCE has been working for many years with various local jurisdictions and communities on master planning appropriate uses within its rights-of-way. Such an approach enables a balance of uses to be achieved, and ensures involvement by the local jurisdiction and local residents and community organizations in helping to plan balanced uses and achieve important mutual objectives. It's a winning approach for all involved.

19-3
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19-3
(Cont'd)

For example, SCE has been working with the City of Long Beach and other interested parties on a package of three sites along the river, two of which would be mitigation sites and devoted to City parkland expansion while the other site would be used for a self-storage project. This approach enables the City to achieve its objective of parkland expansion and for SCE to achieve economic development value for its ratepayers with an appropriate and compatible use. In addition, SCE has been working with the County and other interested parties on the Woodlands Duck Farm property to address access and compatible use matters, which are important issues to SCE due to their potential impacts on its rights-of-way and system operations. SCE has also been working with the cities of Lakewood, Bellflower, Pico Rivera and others on similar balanced uses that help achieve mutual objectives.

19-4

3) SCE's Recommended Revisions to the Draft San Gabriel River Master Plan. SCE and the County share many common goals that are consistent in most areas. In addition, both parties are committed to working in collaboration to achieve a balance of compatible uses along the San Gabriel River. There are certain recommendations proposed in the draft Master Plan and DEIR that pose potential problems and impacts to, and may not be compatible with SCE's rights-of-way and operating system. SCE proposes revisions to these sections to remove and/or mitigate potentially adverse impacts to its system operations. Moreover, with these proposed projects and others in the future, early communication with SCE is essential and will greatly enhance the project planning process, and the likelihood for SCE approval and project success.

19-5

SCE's two overriding requirements relate to any project proposed on its property that might impact its operating system or emergency response capability:

- SCE requires ongoing, complete access to its rights-of-way in order to perform routine maintenance and any required emergency repair or restoration of the facilities located there. No project, facility or operation can be allowed within its rights-of-way that would limit or impede such essential access or impact SCE's existing and future operating systems whether in the immediate project area or anywhere else in our rights-of-way and operating system.
- Establishing new wetlands or other similar natural habitat, vegetation or related natural plant areas within SCE's rights-of-way may be incompatible with SCE's operational requirements because they impede access to our operating systems and potentially impact the integrity of electric system operations. Such projects should be sited elsewhere in more appropriate locations. Prior to planning such projects, proponents must discuss any such proposals with SCE. SCE reserves the right of final approval for any projects utilizing SCE rights-of-way.

Following are comments addressing specific sections of the draft Master Plan that SCE believes need to be clarified or revised, discussed through our on-going collaborative process, or that SCE believes are incompatible with its system operating needs and responsibilities:

19-6 | A. **Wilderness Park Reclaimed Water & Open Space Park/City of Downey.** Six acres of land SCE leases to the City of Downey are identified for passive recreational use, using plants that are native habitat species. County, City and SCE need to continue to work on specific details to ensure compatibility with SCE operating requirements.

19-7 | B. **H. Byrun Zinn Park Improvements/City of Bellflower.** Four acres of existing parkland located adjacent to the San Gabriel River and within the SCE right-of-way are identified for passive, low-impact recreation use, including pedestrian paths, trees and benches. The County, City and SCE will continue to work together on specific details to ensure compatibility with SCE operating requirements.

19-8 | C. **El Dorado Regional Park Wetlands & Master Plan Update/City of Long Beach.** SCE has three sites in this project area and has been working in collaboration with the City and other interested parties on the use of two of the most accessible sites, located adjacent to the City's existing park, for use as expanded passive City parkland. The third site, farther south and on the east side of the river, has been identified for a self-storage facility given its limited access, distance from parkland, compatible use within the right-of-way and other related factors. This approach is a good example of a balanced approach to uses of SCE property. Two other proposals related to this area include possible use of some of SCE's land on the east side of the river for wetlands and related habitat areas and relocating SCE power lines further into El Dorado Park. Such proposals may be incompatible with SCE's right-of-way system requirements, as described above, and must be discussed with SCE early in the project conceptual stage..

19-9 | D. **Habitat Restoration and Linkages Opportunities.** The County and SCE will need to work on specific details related to proposed habitat restoration opportunities in the Reach 4 area, especially as it relates to any potential development of open space as a habitat easement within SCE's rights-of-way. SCE does not believe such uses are completely compatible with its operating obligations, nor does it believe that proposed "safe harbor agreements" provide sufficient legal or operational safeguards essential to SCE's operating requirements. Further discussion is required with SCE prior to the County or anyone else making any commitment of resources and SCE approving any project proposals.

19-10 | E. **Trail Enhancement Opportunities.** Trail enhancements, in particular for hiking and non-motorized biking, are feasible in many locations within SCE's rights-of-way and collaborative efforts have been and will continue to be pursued as appropriate and viable. In terms of the Master Plan's proposal for additional lighting, fencing and screening and other related security measures

19-10
(Cont'd)

for both open space and economic development projects within SCE rights-of-way, it will be important for SCE, property users, local jurisdictions and others to address such needs on a project-specific basis based on need, viability and compatibility.

19-11

F. **Open Space Opportunities.** SCE does in fact own in fee or has acquired an easement affecting approximately 85 percent of the land along the river corridor described as open space in the Master Plan. This property is in fact SCE developed operating property. SCE has a responsibility and obligation to manage it in an appropriate manner to ensure the integrity of its operating system. SCE is also committed to achieving a balance of uses within its rights-of-way, including economic uses such as light industrial and storage facilities, which then allows SCE to offer the use of other portions of its property for green/passive recreational uses. In certain instances green/passive recreational use sites are viable only if they are able to compete economically with identified and desirable economic uses. Such a balanced approach is important and helps achieve the mutual goals of all involved parties. Protecting existing available green/passive recreational uses and creating new opportunities through acquisition and land use conversion projects, as described in the draft Master Plan, is an important objective shared by both the County and SCE. This objective can best be achieved through the balanced approach SCE has been pursuing working with the County, local jurisdictions, communities and others and that the County has articulated in its draft plan. However, commitment of any SCE rights-of-way property for use as wetlands or other significant habitat or natural vegetation areas may be incompatible with its system operating requirements, as described above. Conservation easements and "safe harbor agreements" may also not be suitable with SCE's system operating requirements, as described above. These issues must be addressed by the County and SCE prior to SCE making any final decision or approving any proposed project.

19-12

G. **Flood Control Enhancement Opportunities.** SCE has been working with the City of Long Beach and other interested parties on three sites in the El Dorado Regional Park area, as identified above. SCE has provided for expanded hiking and non-motorized biking trail use opportunities along the site slated for self-storage, the so-called south of Willow site on the east side of the river. However, there are limitations on the amount of additional SCE land available for expansion of river corridor-related projects at that site due to an existing power line that runs adjacent to the river and trail. In addition, any proposal for wetlands projects, as indicated elsewhere in this document, may be incompatible with SCE's operating requirements. SCE and the County must work closely together on any proposed plans related to proposed expansion of the channel, removal of concrete from the river channel or any other activities that may impact SCE's system operations and the structural integrity of its land and operating systems.

19-13

H. **Bio-Engineered Wetlands Opportunities.** As described above, proposed wetland uses within SCE rights-of-way may be incompatible with its operating system requirements since they may adversely impact SCE's operations and access. Such projects on nearby or adjacent property, while utilizing SCE property for supported and expanded green/passive recreational uses, where appropriate and viable, are an option that SCE may consider. Given the amount of SCE property along the river, SCE is committed to working with the San Gabriel Mountains Regional Conservancy and others as the Watershed Management Plan above Whittier Narrows and other plans are prepared, to identify possible areas where SCE can be of assistance. It is essential that project proponents contact SCE early in the planning stage, before a commitment of resources is made, to ensure the Plans are compatible with SCE's system operating requirements.

19-14

I. **River Corridor Policies and Design Guidelines.** SCE is committed to working closely with the County on policies related to design and uses that are compatible with SCE's operations and do not impose unnecessary operational or financial burdens on the company or the users of its property. To the extent appropriate and feasible, SCE and its users will collaborate with the County on reasonable and necessary guidelines and policies.

19-15

J. **Woodland Duck Farm.** SCE has had extensive discussions with the County and other interested parties on appropriate uses of its rights-of-way within the Woodland Duck Farm property. SCE will continue to collaborate to ensure compatible and viable use of this important property and to ensure there are no adverse impacts to SCE operations and access. As identified earlier, wetlands and related habitat areas may be incompatible uses, and this issue must be addressed early in these discussions. More appropriate locations for wetlands and related uses may be on adjacent or nearby property. In addition, "safe harbor agreements" may not necessarily be adequate mechanisms to ensure SCE preserves its essential open access to its operating property, as described in earlier sections of this letter. SCE looks forward to continued dialogue on these important matters.

19-16

K. **Lario Creek Project.** The currently proposed rendering of the alignments for Lario Creek depicts several meandering stream crossings over SCE's rights-of-way. These proposed designs impose a greater burden on SCE's existing rights-of-way and accompanying access roads in comparison with the existing river alignment. The existing alignment must be maintained with SCE's rights-of-way area in order to ensure SCE's ability to maintain, operate, and possibly expand its existing facilities in a safe, expeditious and cost-effective manner. SCE also has concerns that the proposed increase in the stream's volume and velocity will pose added safety risks to the visiting public. These additional potential risks need to be address with appropriate safety

19-16
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measures. Once the County provides more complete information and plans for this project, SCE will proceed with reviewing hydrology reports and design of the stream (including the proposal to substantially increase its width) regarding impact to SCE's rights-of-way.

19-17

In addition to the specific projects and issues mentioned above, SCE will require additional information for all areas where proposed developments cross SCE's rights-of-way. Based on the information provided, it is unclear what impacts the proposed projects, including such projects as the Discovery Center and San Gabriel Canyon Spreading Grounds, will have on SCE's facilities, access, and rights-of-way, SCE cannot consider any project proposal that may impose additional constraints on its ability to maintain and operate its facilities and that may interfere with any future facility expansion. Finally, in working together to address project requests and proceeding with approved projects, it is essential that the County understands and agrees that SCE project administration and related costs will be applicable and will be addressed and agreed to early in the discussion phase.

19-18

Conclusion

SCE believes there are many areas where the County and SCE can continue to collaborate on a balance of desirable and appropriate uses along the San Gabriel River and where SCE can offer the use of needed property to the County and other involved parties to help achieve many of the goals described in the draft Master Plan. SCE is committed to continue its collaborative work with the County to address these matters and retain the shared vision and objectives important to this Master Plan and SCE's operational and maintenance requirements and responsibilities for existing and future facilities. However, as described herein, there are some recommendations in the draft plan that are not compatible with SCE's utility rights-of-way and may adversely impact SCE's operations. It is imperative that SCE's critical operational and maintenance requirements are recognized by all parties and are not interfered with, lest our ability to provide safe, reliable electric service be impaired. SCE appreciates the County's understanding of these critical requirements and obligations.

Thank you for the opportunity to provide comments on the County's draft Master Plan for the San Gabriel River Master Plan. We look forward to our continued work together.

Sincerely,



Maryann Reyes
Director of Public Affairs

Attachment: Southern California Edison Company Rights-of-Way Constraints Guidelines

Southern California Edison Right-of-Ways Constraints Guidelines

Objectives

- Ensure SCE's system operating requirements remain the primary priority of its right-of-way and related operating property. This means access to our facilities for maintenance and system restoration following natural disasters affecting those facilities.
- Where appropriate, provide opportunities for secondary land uses, and compatible with SCE's system operating requirements, within its right-of-way property, as long as SCE is engaged by the project proponent early in the proposed project concept design and planning process.
- Establish a collaborative process where SCE and interested parties can work together to explore project options and provide general parameters helpful to all involved.

Transmission Corridors are Vital

SCE owns transmission corridors for the purpose of locating current and planned electrical facilities – towers, wires, substations and related equipment. The need for new transmission corridors is very high right now and for the foreseeable future because of increased electricity demand and usage in SCE's service territory, and the accompanying need to build new power plants and enhance electricity transmission facilities in California. Acquiring new land for transmission lines is increasingly difficult because of the dwindling availability of land, environmental requirements, and the costs and perceived impacts on adjacent property uses. Thus, though this is not the sole answer, SCE will likely be relying more than ever on locating new and upgraded facilities in our current transmission corridors to serve the growing demand for electricity.

Expanded Use of SCE Property

There are some constraints on additional use of the lands where SCE facilities are located, based on who owns them. Some of the property is owned in fee by SCE; the remaining property is held in exclusive easements. These easements frequently impose restrictions on other uses to which the owner of the underlying fee interest can put the land. In both cases, the use of all the SCE's transmission corridor property is regulated by the California Public Utilities Commission since the CPUC oversees the spending of ratepayers' money. To minimize this ratepayer expense, SCE's usual practice is to buy the minimum amount of land necessary for electric system operating and support purposes. This typically means there is no excess land available for other uses in these corridors.

Property that SCE owns outright is under the scrutiny from the CPUC, which has the authority to approve additional secondary uses under Public Utilities Code Section 851. Some of the property currently under contract includes sites used for nurseries, self-storage, and boat and RV storage. In these projects there is more flexibility with possible secondary land uses.

For property which SCE has purchased in exclusive easements, secondary land use is more problematic may not be allowable. For each piece of property there is a separate easement agreement with various terms and conditions agreed to by the parties at purchase that stay with the property in perpetuity. These easement agreements can include restrictions on the secondary land uses to which the property's underlying fee owner can put that land. Each transmission corridor is a patchwork of these agreement-governed lands, and so any project for secondary land use must be evaluated on a project-by-project basis. As such, each project must be consistent with regulatory constraints and the rights SCE purchased under the terms and conditions of the easement agreement.

SCE has a number of agreements with companies, individuals and government agencies for secondary land uses. These agreements may vary in length depending on the use and type of contract. License Agreements, typically are shorter terms, while Lease Agreements are longer in term, if the CPUC approves them. Sometimes these agreements are renewable, but often they are not. The ultimate decision is based on SCE's electric operating system needs for that property.

Constraints on SCE Land Uses

Highlighted below are some general guidelines that are intended to be helpful in considering possible project concepts. They are intended to assist those parties interested in pursuing possible projects in the early stages to save time and resources:

- SCE's access to its property and facilities must be maintained and cannot be encumbered, in order to ensure SCE's access for system operations, maintenance and emergency response.
- Adequate clearance around SCE towers and poles shall be maintained:
 - 50- or 100-foot radius from tower footings (depending on type of tower)
 - 10-foot radius around anchors/guy wires, tubular steel poles and wood poles
- Adequate clearance from overhead lines (conductors) to the ground.
- Access roads must be fully available with a minimum of 16 feet usable width and capable of supporting 40-ton, three-axle trucks:
 - All curves shall have a radius of not less than 50 feet measured at the inside edge of the usable road surface
 - Maximum cross slope for all access roads shall not exceed 2% and shall slope to the inside
- Limitations on landscaping, including the size and location of trees, bushes and other vegetation shall be followed.
- Restrictions on any underground facilities, such as irrigations systems, with any proposed facility required to have a minimum cover of three feet from the top of the facility and be able to withstand a gross load of 40 tons.

Wetlands or other similar natural habitat, vegetation or related natural plant areas within SCE's Right of Way are incompatible with SCE's operational requirements and should be sited elsewhere in more appropriate locations.

The use of SCE's property is guided by California Public Utilities Commission regulations (General Order No. 69-C) which define the need to protect utility system operations, and provide guidance on overall uses of the right-of-way, the types of agreements allowed, and related approval processes.

Project Proposals

On a case-by-case basis, SCE will consider compatible, low-intensity secondary uses that do not impose additional constraints on SCE's ability to maintain and operate its current facilities and that do not interfere with any future operating facility needs. Examples of possible low-intensity uses include bicycling and hiking trails, landscaping, and park and similar green use.

It is essential and most productive for all involved parties to contact SCE as soon as possible in the project concept stage. SCE must approve any proposed project design and construction plan in writing before the project can proceed. Jose Ulloa, SCE's Manager of Right of Ways (714-895-0367), should be contacted with all requests. Depending on the nature and scope of the project, SCE may require fees to be paid to cover planning, research and other project-related costs. In addition, a license or consent agreement and related fee will be required for any secondary use. All details and questions can be addressed during the project concept and approval process.

Note: The following three-page document entitled “Southern California Edison Rights-of-Way Constraints Guidelines (June 2005)” was submitted by Southern California Edison (SCE) to the County of Los Angeles Department of Public Works in June 2005 after the public review period for the San Gabriel River Corridor Master Plan Draft Program EIR. This document supersedes the previous three pages, which was attached to SCE’s comment letter on the Draft Program EIR (dated May 4, 2005).

**Southern California Edison Rights-of-Way
Constraints Guidelines
(June 2005)**

Objectives

- Ensuring that SCE's system operating requirements are met remains the primary priority for its right-of-way and related operating property. This means access to our facilities for maintenance and system restoration following natural disasters affecting those facilities.
- Where appropriate, SCE is committed to providing opportunities for secondary land uses, compatible with SCE's system operating requirements, within its right-of-way property, as long as SCE is engaged by the project proponent early in the proposed project concept design and planning process.
- SCE is interested in establishing a collaborative process where SCE and interested parties can work together to explore project options and provide general parameters helpful to all involved.

Transmission Corridors are Vital

SCE owns transmission corridors for the purpose of locating current and planned electrical facilities – towers, wires, substations and related equipment. The need for new transmission corridors is very high right now and for the foreseeable future because of increased electricity demand and usage in SCE's service territory, and the accompanying need to build new power plants and enhance electricity transmission facilities in California. Acquiring new land for transmission lines is increasingly difficult because of the dwindling availability of land, environmental requirements, and the costs and perceived impacts on adjacent property uses. Thus, though this is not the sole reason, SCE will likely be relying more than ever on locating new and upgraded facilities in our current transmission corridors to serve the growing demand for electricity.

Expanded Use of SCE Property

There are some constraints on additional use of the lands where SCE facilities are located, based on who owns them. Some of the property is owned in fee by SCE; the remaining property is held by way of easements and other property rights. These easements frequently impose restrictions on other uses to which the owner of the underlying fee owner's use of the land. In both cases, the use of all the SCE's transmission corridor property is regulated by the California Public Utilities Commission (CPUC) to protect the interests of SCE customers. To minimize the expense to its customers, SCE's usual practice is to buy the minimum amount of land necessary for its electric system operating and support purposes. This typically means SCE has no excess land available for other uses in these corridors.

Property that SCE owns outright is under the scrutiny of the CPUC, which has the authority to approve additional secondary uses under Public Utilities Code Section 851. Some of the properties that SCE currently has under contract include sites for nurseries, self-storage, and boat and RV storage. SCE has more flexibility with possible secondary land uses on property it owns.

For property which SCE has purchased easements, secondary land use is more problematic and may not be allowable. For each piece of property there is a separate easement agreement with various terms and conditions agreed to by the parties at the time of purchase that stay with the property in perpetuity. These easement agreements can include restrictions on the underlying fee owner's permissible land uses.

Each transmission corridor is a patchwork of fee owned property and other rights and so any project for secondary land use must be evaluated on a project-by-project basis. As such, each project must be consistent with regulatory constraints and the rights SCE purchased.

SCE has a number of agreements with companies, individuals and government agencies for secondary land uses. These agreements may vary in length depending on the use and type of contract. License Agreements typically are for shorter terms, while Lease Agreements are longer in term, if the CPUC approves them. Sometimes these agreements are renewable, but often they are not. The ultimate decision on whether to allow secondary land uses, and if so, under what terms and conditions, is based on SCE's electric operating system needs for that property.

Constraints on SCE Land Uses

Highlighted below are some general guidelines that are intended to be helpful in considering possible project concepts. They are intended to assist those parties interested in pursuing possible projects in the early stages to save time and resources:

- SCE's access to its property and facilities must be maintained and cannot be encumbered, in order to ensure SCE's access for system operations, maintenance and emergency response.
- Adequate clearance around SCE towers and poles shall be maintained:
 - 50- or 100-foot radius from tower footings (depending on type of tower)
 - 10-foot radius around anchors/guy wires, tubular steel poles and wood poles
- Adequate clearance from overhead lines (conductors) to the ground.
- Access roads must be fully available with a minimum of 16 feet usable width and capable of supporting 40-ton, three-axle trucks:
 - All curves shall have a radius of not less than 50 feet measured at the inside edge of the usable road surface
 - Maximum cross slope for all access roads shall not exceed 2% and shall slope to the inside
- Limitations on landscaping, including the size and location of trees, bushes and other vegetation shall be followed so as not to interfere with SCE operating facilities; specific information will be provided during initial meetings.
- There are restrictions on underground facilities, such as irrigations systems, with any proposed facility required to have a minimum cover of three feet from the top of the facility and be able to withstand a gross load of 40 tons.

Wetlands or other similar natural habitat, vegetation or related natural plant areas within SCE's Right of Way may be incompatible with SCE's operational requirements because they impede access to our operating systems and potentially impact the integrity of electric system operations. Such projects should be sited elsewhere in more appropriate locations. Prior to planning such projects, proponents must discuss any such proposals with SCE. SCE reserves the right of final approval for any projects utilizing SCE rights-of-way.

The use of SCE's property is guided by California Public Utilities Commission regulations (General Order No. 69-C) which define the need to protect utility system operations, and provide guidance on overall uses of the right-of-way, the types of agreements allowed, and related approval processes.

Project Proposals

On a case-by-case basis, SCE will consider compatible, low-intensity secondary uses that do not impose additional constraints on SCE's ability to maintain and operate its current facilities and that do not interfere with any future operating facility needs. Examples of possible low-intensity green/passive recreational uses include horticultural/agricultural; parks; and hiking and non-motorized biking trails. Examples of possible low-intensity economic uses include vehicle, boat and recreational vehicle parking; and material, equipment and moveable self-storage facilities.

It is essential and most productive for all involved parties to contact SCE as soon as possible in the project concept stage. SCE must approve any proposed project design and construction plan in writing before the project can proceed. Contact Jose Ulloa, SCE's Manager of Right of Ways (714-895-0367), with all requests. Depending on the nature and scope of the project, SCE may require fees to be paid to cover planning, research and other project-related costs. In addition, a license or consent agreement and related fee will be required for any secondary use. All details and questions can be addressed during the project concept and approval process.

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Comment Letter No. 20

Southern Council of Conservation Clubs, Inc.

"IN UNITY THERE IS STRENGTH"



20-1

THE SAN GABRIEL RIVER REPORT
WAS WELL DONE. WE AGREE WITH
1.2, 1.3, 1.4, 1.5, 1.6 - MAXIMUM HABITAT
ALTERNATIVE AND WANT HUNTERS AND
FISHERMEN INVOLVED

Gene J. Foy DDS.
PRESIDENT

20-2

P. S. WHAT A THANK YOU
MUST BE ADDRESSED
IS THE PROBLEMS
THAT BIEHORN
SHEEP HAVE WITH MOUNTAIN
LICKS.

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UNITED ROCK PRODUCTS

Comment Letter No. 21

May 4, 2005

Martin Moreno
L.A. County Dept. of Public Works
900 South Fremont Ave., 11th Floor
Alhambra, CA 91803-1331

RE: San Gabriel River Corridor Master Plan Draft Program Impact Report

Dear Mr. Moreno,

21-1

As a quarry owner that has participated in this process, we request that we be notified, as projects that affect our quarries are advanced. We wish to be included at the inception of these activities so that we may have full participation in the development of these important projects. As you know, many of the proposals will have a direct impact on the way in which we conduct our business. It is imperative that our mining concerns be accommodated as projects are being developed.

United Rock Products appreciates having been included in the development of the San Gabriel River Master Plan. We look forward to working with the County Department of Public Works in the future. Thank you for giving us the opportunity to comment.

Best regards,

A handwritten signature in black ink that reads "Ken Barker".

Ken Barker
Environmental & Regulatory Affairs Manager
United Rock Products Corporation

Copy: Rama Rydman, L.A. County Dept. of Public Works
Jerry Burke, L.A. County Dept. of Public Works
Daniel Iacofano, Moore Iacofano Goltsman Inc

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Vulcan
Materials Company
Western Division

May 4, 2005

Comment Letter No. 22

Ms. Rama Rydman
County of Los Angeles
Department of Public Works
Watershed Division
900 S. Fremont, 11th Floor
Alhambra, CA 91802-1460

RE: DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE SAN GABRIEL RIVER CORRIDOR MASTER PLAN REQUEST FOR COMMENTS.

Dear Ms. Rydman,

This letter is in response to your Request for Comments on the above referenced Environmental Impact Report for the San Gabriel River Corridor and Master Plan. Vulcan Materials Company, Western Division ("Vulcan") has several operations adjacent to the 58-mile long San Gabriel River Corridor in the cities of Azusa and Irwindale. We understand that portions of the Master Plan incorporate existing sand and gravel quarries that are either active or inactive. A number of our quarries along the San Gabriel River Corridor remain active, and will be for the foreseeable future.

22-1

Vulcan's main concern is that the Master Plan is consistent with the overall land uses within each city. The consistency must include end land use, the right to continue mining operations pursuant to approved land use permits and reclamation plans, and the appropriate co-existence between each project in the Master Plan and these mining operations.

22-2

As stated in previous communications it is important to re-emphasize that Vulcan's sand and gravel mining operations along the San Gabriel River occur on privately-owned land, conducted by a privately-owned business organization, governed by regulations promulgated by appropriate federal, state, county and local authorities. Also, Vulcan holds extensive water rights in the San Gabriel Valley Basin and other areas which might adversely affect the stated projects.

22-3

It is apparent by Vulcan's past and present mining reclamation projects that we have clearly demonstrated our commitment to enhancing the river system and restoration of the waterways and plans to continue with this enhancement once our mining operations cease along the San Gabriel River.

On November 23, 2003, Steve C. Cortner, Vice President, Resources for Vulcan Materials, Western Division submitted comments on the Master Plan; we are again submitting them for inclusion into the official comments.

Page 2
Ms. Rama Rydman
County of Los Angeles

22-4

Vulcan request that we be placed on the mailing list for all projects contained in the Draft Environmental Impact Report and Master Plan.

Sincerely,
VULCAN MATERIALS COMPANY, WESTERN DIVISION



Angela Driscoll,
Principle Government and Permitting Analyst

attachments

Vulcan Materials Company

Western Division

STEVE CORTNER
VICE PRESIDENT, RESOURCES

3200 SAN FERNANDO ROAD
LOS ANGELES, CALIFORNIA 90065
TELEPHONE 323 474-3225
FAX 323 258-3289
E-MAIL cortners@vmcmail.com

November 24, 2003

Mr. Daniel Iacofano
Moore Iacofano Goltsman Inc.
800 Hearst Avenue
Berkeley, CA 94710

RE: SAN GABRIEL RIVER DRAFT MASTER PLAN

Dear Mr. Iacofano:

CalMat Co. dba Vulcan Materials Company, Western Division ("Vulcan") owns and operates various quarries in close proximity to San Gabriel River or its tributaries thereto. Vulcan is the nation's largest producer of construction aggregates, a leader in production of other construction materials, and a manufacturer of chemicals. Vulcan is an S&P 500 company and is listed and traded in the New York Stock Exchange under the symbol VMC. Vulcan has over 10,000 employees nationwide.

Based on my meetings between you, Martin Moreno Senior Civil Engineer Watershed Management Division County of Los Angeles, Department of Public Works and Rama Tallamraju Watershed Management Division of Los Angeles, Department of Public Works, I will reduce to writing those issues and comments that Vulcan has with the above-mentioned Draft Master Plan. I request that these comments be incorporated into the draft document prior to this draft going to the general public for its review. Before I get into the text of the Draft Master Plan, I would like to discuss some mining history of the San Gabriel Valley.

As you may know, the San Gabriel Valley has been the "mother lode" of Southern California's richest aggregate. Early in the 20th Century, local rock, sand and gravel producers realized that the aggregates found in the area comprises the cities of Azusa, Duarte, Irwindale and Baldwin Park has the perfect combination of minerals for the use in construction. The San Gabriel River at the base of the 9,399 foot elevation Mt. Baden Powell peak of the San Gabriel Mountain Range, has for centuries transported an abundant amount of construction grade aggregates resources (more commonly known as rock, sand and gravel) from a 439 square mile watershed area of rugged mountainous terrain to the valley floor after completing a 20-mile course through the mountains.

The aggregate rich "San Gabriel River Alluvial Fan," is the State of California's, and some say the world's greatest and most abundant aggregate resources. It is comprised of material from the Holocene and Pleistocene era, which aggregate is very durable and perfect for making concrete and asphalt. In the headwater area of the San Gabriel River, where most of the aggregate production sites are located, the larger of the natural gravel is about 6 feet in diameter huge boulder-sized gravel.

Since those days in the early 1900s, Vulcan and its predecessor companies and competitors have produced well over a billion tons of aggregate for the general Los Angeles area. These materials were the basis for the development of not only our local San Gabriel communities, but the entire Los Angeles region as well. Virtually all of our most famous local landmarks in our area including the Los Angeles Memorial Coliseum, the Los Angeles Harbor, and our extensive networks of freeways could not have been built without the local aggregates that the San Gabriel Valley plants produced.

As a major participant in the growth of the San Gabriel Valley, Vulcan and its predecessors have seen the area change from a community of sleepy citrus-growing private landowners to vibrant cities. As our communities evolved, Vulcan has become much more involved in partnering with our neighbors to achieve shared goals. In the early days, our involvement was primarily comprised of providing jobs and supporting the growth of communities through property taxes and excavation fees. Today we understand that partnering with our communities is a corporate and civic mission. By partnering with the communities in the San Gabriel Valley, Vulcan is better able to responsibly reclaim its production sites when mining is complete. For example, Vulcan's current Fish Creek restoration project will permanently restore a previously mined portion of Fish Creek to its original pre-mining location while at the same time recreating a high-quality aquatic and riparian habitat.

Clearly the early aggregate producers anticipated that the San Gabriel area was going to grow and develop due to its location, one of California's greatest resources, however, none of them realized how important their role would be in the San Gabriel Valley to support the very backbone of our infrastructure in the greater Los Angeles area.

WHAT IS AGGREGATE?

The average person typically does not give much thought to the subject of aggregate and its value. In fact, the United States Geological Survey has stated that "natural aggregate is one of the nation's most poorly understood resources." Yet, aggregate resources are required by all urbanites as modern construction techniques rely heavily on a wide variety of products made from these materials.

Aggregate is different types of rock fragments, such as rock, sand and gravel. These materials are obtained from the earth through a process called "surface mining," or otherwise called "open-pit mining." After these materials are mined, they are usually washed and sorted by size before they are sold to the market.

"Gravel" refers to all sizes of natural aggregates larger than sand or any rock larger than "quarter inch." Gravel is generally divided into 1½", 1", 3/8" nominal sizes. Cobble gravel is generally 2.5" to 10" and boulders are anything larger than 10". Sand sizes are between ¼" and finer. "Rock" is a general term and does not have a size range. However, most crushed rock used in aggregate base and asphalt are ¾" in size and smaller.

In cases where natural sand and gravel are unavailable, commercial aggregate is created by crushing large stones or by drilling and blasting massive rock formations and producing them into various sizes of rock and manufacture of sand. This process is called "quarrying," when drilling and blasting of massive rock formation is required to produce aggregate and all the materials produced by this process are called "crushed stone." Unlike smooth, natural aggregate, crushed stone tend to be angular with sharper edges.

In Southern California, natural aggregate deposits are formed by the erosion of bedrock and the subsequent transport, operation and deposition of these rock fragments by the waters of the creeks, streams and rivers flowing from the local mountains and valleys. Commercial quality and quantity of aggregate resources are generally abundant within and around natural river and stream courses as well as in the alluvial fans of these rivers and streams which tend to form at the base of mountains and hills. Accordingly, natural aggregates must be obtained from these naturally occurring locations such as rivers, streams and alluvial fans.

WHY DO WE NEED AGGREGATES?

Aggregate resources are used to make many features of the urban landscape that we depend on in our daily lives. For instance, rock, sand and gravel are each an integral component of "Portland Cement Concrete" (PCC) which is used to build houses, schools, churches, sidewalks, water and sewer systems, bridges, airport runways, commercial buildings, streets, highways and other common projects. Aggregate resources are also a key ingredient of asphalt concrete (AC), as well as the base and fill material required to repair and build streets, highways and parking areas. Portland Cement is a mixture of rock, sand, gravel, cement, water and other "ad mixtures." Asphaltic Concrete is a mixture of crushed rock, manufactured natural sands and hot, liquid asphaltic oil.

In California, the supply and demand for aggregate resources are tracked by the California State Department of Conservation's "Division of Mines and Geology" (DMG). The DMG regularly analyzes the supply and demands of aggregates in California and publishes special reports indicating the past and anticipated future needs for regional aggregate supplies.

The DMG has found that each Los Angeles resident, including every man, woman and child, requires approximately 3.7 tons of new aggregate resources per year for the construction of streets, schools, shopping centers, homes and all other basic structures that our society uses. The entire Los Angeles region consumes about 48 million tons of aggregate per year. By

comparison, the entire State of California consumes more than 180 million tons of aggregate per year. Our society simply has a tremendous need for aggregates!

VULCAN'S PREDECESSORS SINCE THE EARLY 1900s

Vulcan has operated within the San Gabriel Valley since the 1900s. (Vulcan's predecessors and subsidiary companies are listed below.)

1. Vulcan Materials Company, Western Division
2. CalMat Co.
3. Conrock Co.
4. Consolidated Rock Products Company
5. Union Rock Company
6. Reliance Rock Company
7. Russell Green Foell Corporation
8. Southern California Rock and Gravel Company
9. Los Angeles Rock and Gravel Company
10. Azusa Rock Products
11. Kirst Construction
12. Pacific Rock and Gravel Company

After a brief review of the construction aggregates' long history in the San Gabriel Valley, one should give credence to its extreme importance in supplying the backbone of the infrastructure for the greater Los Angeles area notwithstanding its past, present and continued use in and around the San Gabriel riverine system.

The following comments will focus on the draft master plan specific to language found within the plan's text. A very important point to understand when addressing the numerous quarry locations contained in the draft document is that the gravel quarries are located on private property. More specifically the quarries are owned by the operators, operating under various entitlements such as CUPs, vested rights, reclamation plans and other ancillary permits required for the lawful operation of such quarries. The future of sand and gravel operations throughout the San Gabriel Valley is projected to continue for the next 30 to 40 years. Some operations will exhaust their resources prior to other operations. Clearly, mining activity will exist at least three to four decades from the date of this San Gabriel River Master Plan. Additionally, most operators are undergoing negotiations with the respective cities of Azusa and Irwindale on changes to their reclamation plans and potential changes to their operational permits. These changes may reflect different pit configurations, greater depth or changes to the end-use called out in the existing reclamation plans. Past reclamation plans represent end uses that will not be the ultimate end use due to changes in population, geographic area and property values, as some reclamation plans were originally created years ago. Local cities, such as the City of Irwindale, have a keen interest in development for commercial and industrial property and to some extent residential development in areas of exhausted pits or ones that will be exhausted sometime in the

future. Because negotiations continue today, Vulcan cannot indicate the precise use of any of its quarries until agreements are finalized within our operating areas.

3.5.3 Reach No. 3 – Upper San Gabriel Valley – R3-09-Pedestrian Bridge

The City of Azusa has indicated to Vulcan that they would like to investigate the use of the conveyor belt that traverses across the San Gabriel River as a potential bicycle and/or pedestrian bridge. Although Vulcan does not have any objections to the use of this bridge at some point when mining is completed, Vulcan has not engaged in negotiations with the City to discuss potential liability and cost relative to the conversion of this conveyor crossing to a bicycle and/or pedestrian bridge overcrossing.

R3.10 – West River Bank Tree Planning Project at the San Gabriel Valley Gun Club

Current negotiations are ongoing with the San Gabriel Valley Gun Club to mitigate noise emanating from the Club into residential receptors. These negotiations are not complete but involve individuals from the City of Azusa, representatives of Vulcan and representatives from the San Gabriel Valley Gun Club. Accordingly, Vulcan has not included these trees as potential mitigation to noise impacts.

R3.11 - Azusa Rock Quarry Restoration

Vulcan is currently pursuing a revised reclamation plan for the Azusa Rock Quarry. The existing reclamation plan is a subject of negotiations between Vulcan and the City of Azusa. A revised reclamation plan would change the quality of reclamation that currently exist at this quarry site.

R3.12 – Fish Creek Restoration and Public Access

Vulcan is currently working with the City of Duarte and discussing with the City of Azusa a limited public access through the Azusa Rock Quarry along Fish Creek. This access could occur on a limited basis, potentially on weekends and holidays. Due to safety and liability reasons, Vulcan will have to limit access to daylight hours and non-operational hours of the quarry operation. These discussions are ongoing and no agreement has been reached to date between the City of Azusa, the City of Duarte and Vulcan. There has been no discussion nor does Vulcan have any knowledge of any bicycle and pedestrian connection to Fish Creek from the San Gabriel bike trail and City of Azusa. Accordingly, the first part of the sentence in the provision of bicycle and pedestrian connection to Fish Creek from San Gabriel bike trail and the City of Azusa is speculative at best and Vulcan knows of no way of providing access across the river that would be safe and appropriate for such a crossing. It would best be left out of the text.

R3-16 – Azusa – Largo Pit

The Azusa Largo Pit appears to be in reference to Vulcan's quarrying operation north of Foothill Blvd. This pit houses our current aggregate production facility as well as shop facilities and asphalt plant production facilities. The plant at the Azusa Largo Pit produces material from the area in which it exists as well as material that is transported via conveyor system from Azusa Rock Quarry. The existence of this operation will exceed 40 years. Although the ultimate reclamation plan is under consideration between the City of Irwindale and Vulcan, this operation will supply aggregate, construction grade materials as well as asphalt materials to the general area for over 40 years. Ultimate end land use post-mining will be determined at a later date subject to negotiations between the City of Irwindale and Vulcan.

R3.17 – Reliance Pit No. 2

The reference of this pit appears to be the existing landfill located south of Foothill Blvd. bordered by the 210 Fwy. and bounded to the east by Irwindale Avenue. This operation is currently being used to facilitate silt deposition from the existing Reliance Plant and operating as a landfill facility to ultimately fill and use for some commercial activity. Currently, the Reliance No. 2 Pit is a subject of negotiations between the City of Irwindale and Vulcan in determining potential ultimate land use and other issues surrounding this pit. The time to complete the landfill is unknown at this time.

R3.20 – Route 66/Foothill Blvd. Gateway

Vulcan is unclear as to what this gateway means to the San Gabriel River post-mining and what river landscape enhancements are currently underway. Vulcan is assuming that this is the area that borders the Azusa Largo Pit extending to the reaches of the confluence of Fish Creek. Vulcan would appreciate understanding what is meant by "a potential future city of Duarte gateway to the San Gabriel River after mining is complete and river landscape enhancements are underway."

3.5.4 Reach No. 4 – Lower San Gabriel Valley

R4-01 Multi-Objective Gravel Quarry Reclamation Study

The Multi-Objective Gravel Quarry Reclamation Study has not come to any conclusions nor has it analyzed the feasibility of using gravel pit quarries for multiple purposes which would include storm water capture and cleanup, recharge of storm and imported water, flood reduction, recreation and habitat restoration, as well as aesthetic appearances. The study has not reached a point where any conclusions can be drawn nor have the study proponents had any meaningful or substantive conversations with the mine operators to get the mining communities' input on such

a study. Vulcan requests that this multi-objective gravel quarry reclamation study be removed or at least explained that this study is not complete and any implementation of this study into the San Gabriel River Master Plan would require future environmental review and cannot be analyzed under the existing environmental review of this document. Clearly, Vulcan is unable to comment on a study that has not occurred, a study that has not come to any conclusions, and a study that is not understood as to its impacts or effects it will have on any of Vulcan's properties.

R4-07 Durbin Quarry

The Durbin Quarry is an ongoing mining operation owned and operated by Vulcan. The Durbin Quarry is undergoing negotiations between the City of Irwindale and Vulcan as to final reclamation and landform. Irwindale is keenly interested in the potential of its economic development opportunity, however, Vulcan and Irwindale have not come to any conclusions as to the final land use development for this property. Clearly, the Durbin Quarry will be an ongoing operation for the next three to four decades. Any opportunities at the Durbin Quarry will have to be negotiated with Vulcan after mining is exhausted. Development of the Durbin Quarry would occur significantly subsequent to the cessation of mining due to the extensive fill requirements necessary to bring the Durbin Quarry back up to a developable level.

3.6.1 Habitat Restoration and Linkages Opportunities

Future Opportunities

Fish Creek Restoration and Public Access (R3.11)

Vulcan has recently implemented restoration of Fish Creek on approximately the upper one third of Fish Creek in the area that is owned by Vulcan. The restoration was extensive and brought the creek back to its estimated original location prior to the commencement of mining. The subsequent plan Vulcan is working on with the City of Azusa in creating new mining and reclamation efforts at the Azusa Rock Quarry will incorporate restoration of the remaining portions of Fish Creek existing on Vulcan's site. The ultimate restoration of Fish Creek will be incorporated into the reclamation plan phasing under discussion between Azusa and Vulcan.

3.6.2 Trail Enhancement Opportunities

Future Opportunities

Under this broad category, fencing is discussed throughout this area of text. Understanding that fencing can take on many different appearances certainly should be considered when trying to enhance the overall aesthetic value of the river system. Vulcan would like to remind you that some fencing that aesthetically enhances the overall riverine system may not serve to be the

appropriate fencing for Vulcan's purpose. Fencing must provide safety to the general public from certain conveyor systems and other operations Vulcan may have along the river adjacent to or contiguous with the river. Accordingly, Vulcan would request that the author of this master plan would understand that certain fencing desires would not be appropriate as the mining companies must protect themselves from liabilities resulting from trespass onto their property.

3.6.3 Bridges, Gateways, and Connections Opportunities

Future Opportunities

Under Reach 3 again there is a discussion of future pedestrian bridge (R3.9) at site of the existing Vulcan Materials conveyor belt. I would like to refer to the discussion on (R3.9) in that Vulcan Materials has no issue with this concept, however, no final negotiations or agreements are entered into between the City of Azusa and Vulcan relative to the use of said conveyor belt.

Under the same Reach 3 area, a paragraph discussing the Vulcan conveyor belt operation for another three decades should be corrected and replaced with four decades.

3.6.4 Interpretive (Education) Center Opportunities

Future Opportunities

In the text exists a discussion of geology, mining and quarry operations which could be a significant interpretive theme in Reach 3. Vulcan has always been proactive in education and the promotion and understanding of mining and its host of ancillary uses. Although the scheme of an "interpretive theme" is nebulous at best, Vulcan would be interested in looking at the concept of such an interpretive theme or center to gain a better understanding of same.

3.6.5 Park Development Opportunities

Future Opportunities

There is a discussion on Reach 3 on future park development and discussion that quarry reclamation offers huge potential for new parks. It further discusses the balance between economic development opportunities with the local municipalities. Examples given, however not exhaustive, are the Azusa Rock Quarry Restoration (R3.10) and Fish Creek Restoration and Public Access (R3.11). Clearly, there is a potential that Azusa Rock Quarry Restoration and the ultimate Fish Creek Restoration and Public Access are a function of the ongoing negotiations Vulcan is engaged with Azusa. The proposed amendments to that operation would provide for such potential. To reiterate, this quarry area is a subject of current negotiations between the City of Azusa and Vulcan and its final outcome and reclamation plan/end land use will not be determined prior to the creation of this document.

3.6.6 Open Space Opportunities

Future Opportunities

Discussion under future opportunities again in Reaches 3 and 4 discuss gravel quarry land reclamation representative of significant opportunities to create additional open space that might be used for recreation and habitat purposes. Some examples given in this text, but not limited to, are Azusa Rock Quarry restoration (R3.10) and the Durbin Quarry (R4.04). Discussion is given to the Azusa Rock Quarry mentioned above and earlier in the explanation of the potential future for Durbin Quarry. Notwithstanding the fact that both quarries are in a state of flux due to ongoing negotiations with the respective cities in which these quarries operate and exist, it is important to understand that these quarries are private property and certain quarries such as the Durbin Quarry exist in very valuable commercial and industrial areas. Local cities are extremely interested in the development of property that will create a tax base and offer legitimate and appropriate highest and best use for the property considering the geographic area in which it exists.

3.6.7 Land Reclamation

Future Opportunities

Acknowledgment in your text is given to the gravel quarries constituting the most significant land reclamation opportunity in San Gabriel River corridor. Further discussion is the quarry reclamation development study (R4-01) being conducted to more precisely determine the land use, land reclamation potential of these projects. Again, four of Vulcan's projects are discussed; the Azusa Rock Quarry Restoration (R3.11), the Azusa Largo Pit (R3-16), the Reliance Pit No. 2 (3.17) and the Durbin Quarry (R4.07). The gravel quarry reclamation development study has reached no conclusions. I believe very little activity has occurred to affect the ultimate results of this study. Certain quarries that Vulcan owns may fit in the overall scheme of the land reclamation opportunity for the San Gabriel River Corridor. However, it is clear that the Azusa Largo Pit, the Reliance Pit No. 2 and Durbin Quarry have much less potential to offer land reclamation that would complement the desire of this master plan, e.g. to enhance the river corridor. Azusa Largo, Reliance and Durbin will ultimately be developed into commercial or industrial type uses.

3.6.8 Flood Channel Enhancement Opportunities

Future Opportunities

Text in the section on quarry reclamation uses San Gabriel spreading grounds in Azusa as an example for re-use or retention/detention areas for floodwaters and include various quarries

along the river. I believe that the Azusa Rock Quarry Restoration (R3.10) would not serve as a good spreading ground or water detention or retention type facility due to its mountainous terrain and lack of alluvial deposition that would be useful for capture of storm water and the recharge into the local groundwater basin. The Durbin Quarry (R4.04) is also slated for potential commercial development due to the interest that the City of Irwindale has relative to use for the property being the highest and best use along the 605 corridor.

In the same section, discussions of stream restoration projects that can serve multiple purposes including providing habitat, improving water quality and reducing peak flows give examples one of which is at Fish Creek Restoration Public Access (R3.11). As to the Fish Creek area that exists on the Vulcan property, no public access has been negotiated at this time, however, Vulcan is working with the cities of Duarte and Azusa to accomplish some type of limited access by the public through the Vulcan properties, more generally along the stream thalweg of Fish Creek. However, Fish Creek does not offer reduction in peak flows but does however offer increased habitat and a potential for public access if Vulcan reaches an agreement between the cities of Duarte and Azusa.

Under bridge project opportunities, maps XX depict a future pedestrian bridge. Again, Vulcan has no objection with the concept of allowing the City of Azusa to provide pedestrian traffic over the conveyor section that crosses the San Gabriel River. However, it is important to understand that certain modifications will have to take place to create a pedestrian bridge versus the use for a conveyor system. Accordingly, Vulcan and the City of Azusa will have to negotiate the use thereof. Any discussion on this pedestrian bridge in the future or otherwise should have a caveat that it is a potential but it does not exist at this time.

The map of interpretive centers, map XX discusses the Vulcan Quarry interpretive exhibit on the San Gabriel River. Again, Vulcan has no objection to the concept of an interpretive exhibit but would like to further understand what that exhibit is, what it represents and the location of the interpretive exhibits' existence. Under the map XX of the San Gabriel canyon spreading grounds, top right hand corner is an arrow that depicts future reclamation connects to Fish Canyon trails. I am assuming that the future reclamation connect to Fish Canyon trails means that there will be a connection and the trail itself will follow Fish Creek through the Vulcan operation. Again, this is subject to the approval of Vulcan and the negotiations between the cities of Duarte and Azusa. Vulcan would appreciate you putting future reclamation connecting Fish Canyon trail subject to ultimate Vulcan approval.

Vulcan appreciates the opportunity to comment on this draft document. It is my understanding from you, Martin Moreno and Rama Tallamraju that you will incorporate my comments in this letter and include Vulcan on the mailing list when the Master Plan draft goes out to the public. Vulcan desires to work with the County of Los Angeles, Department of Public Works on this Master Plan in hopes that when the Master Plan comes to the public, Vulcan can respond in an affirmative posture rather than a negative position.

Vulcan also wishes to have you incorporate into the body of this San Gabriel Master Plan certain land use designations for mining that were created and mandated by the state of California,


Mr. Daniel Iacofano
Page 11

Department of Mines and Geology. The Department of Mines and Geology is required by statute to incorporate land use designations that have proven mineral deposits that are to be used for the development of aggregate resource. The Surface Mining and Reclamation Act ("SMARA") provides for mineral land classification in Sections 2711, 2712, 2761, 2762, 2763 and 2764 of the Public Resources Code. Accordingly, we have incorporated maps depicting the Mineral Land Classification areas within the San Gabriel Valley. Hopefully these maps will be helpful to the County when implementing this master plan and its incorporation of mining within the plan.

Additionally, I have enclosed mineral land classification of the Fish Canyon Quarry, Azusa Quarry, Azusa Quadrangle, Los Angeles County, California. This mineral classification was added December 1988 which includes the entire area in the Fish Canyon area owned by Vulcan.

Vulcan appreciates the opportunity to comment and would welcome any questions that you or the County Department of Public Works may have relative to any of the issues discussed within the contents of this letter or otherwise.

Sincerely,



Steve C. Cortner
Vice President, Resources

SCC:mx

Enclosures: Maps

Copy: Rama Tallamraju, L.A. County Dept. of Public Works
Martin Moreno, P.E. Senior Civil Engineer, Watershed Management Division,
County of L.A. Dept. of Public Works, 900 South Fremont Ave.,
11th Floor, Alhambra, CA 91803-1331

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4/28/05

www.sangabrielriver.com

WHD
800

Department of Public Works
County of Los Angeles
Po Box 1460
900 S. Fremont Ave.
Alhambra, Ca 91802-1460

Comment Letter No. 23

Re: 1. San Gabriel River Corridor Master Plan, Public Comments
2. E.I.R. File: WM-6, Public Comments

Dear Department of Public Works:

Thank you for the opportunity to comment on the San Gabriel River Corridor Master Plan and Environmental Impact Report.

First, I'd like to support any and all efforts to improve and enhance the 58 mile, San Gabriel River Corridor's environmental quality and recreational opportunities. Also, that the E.I.R. is adequate and meets C.E.Q.A. requirements.

23-1

The River Corridor has regional importance. Three million urban weary residents seek the best of what is left of the San Gabriel River Corridor. While I live in the City of La Habra, in Orange County, I utilize the San Gabriel River Corridor for recreation, biking and hiking.

As all of the town of La Habra is in the San Gabriel River Watershed, I am very concerned about storm water pollution of the river and ocean by inland cities, especially the Coyote and La Mirada Creeks in La Habra which drain into the San Gabriel River.

23-2

Second, improving the aesthetics and environmental quality of the Corridor is a high priority. I support the reclamation and remediation of surface mining operations. I also support the return of the River Corridor to a more natural flood control channel where feasible, utilizing the latest in natural flood control engineering techniques. Improving the riparian habitat is a priority. Adding new, and improving existing educational nature centers is a great idea.

23-3

Third, I would like to support improving and enhancing the River Corridor Bike Lane and support development of regional bike trail linkages. Utilizing the old Huntington "Redcar" Railroad Corridor for a bike lane from the town of Brea, west, through downtown La Habra and Whittier to the River Corridor Bike Trail should become a major east-west bike trail connection. The city of La Habra is currently working on this issue. Please add the historic "Redcar" Train Depot in La Habra to your plan. Extending the Coyote Creek Bike Lane north to La Habra is a priority. Bike lane improvements should include landscaping, many shade trees, and rest areas where possible. Increasing access is a priority.

23-4

Fourth, Land Use regulations need to be implemented to enhance the River Corridor's natural character and protect it from further urban deterioration.

Sincerely,

Robert Dale
1401 Sierra Vista Dr.
La Habra, CA 90631

cc City of La Habra; Orange County Trails Advisory Committee.
La Habra Historical Society.

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Rydman, Rama

From: townsquare@migcom.com
Sent: Friday, March 11, 2005 8:19 AM
To: info@sangabrielriver.com
Subject: SGRMP: General Comments

Comment Letter No. 24

Comment Submitted by:

Lester Kau
Residents of Azusa
lk@ecoplanet.com

Subject:

SGRMP: General Comments

Comment:

Hello,

24-1

The city of Azusa has recently rezoned the property that the San Gabriel Valley Gun Club sits on to open space. This property is right along the San Gabriel river. Part of the land is owned by Vulcan Materials (who supports Azusa's decision) and another portion of the property is owned by some Federal Organization. I think that it may be the Army Corp of Engineers. But I'm not sure. This land is right against the San Gabriel river, if not partially in the river bed. The corridor plan is designed to encourage more people to enjoy the natural beauty of the river as well as to protect a natural resource. Having a gun club next to the river increases the risk of lead pollution, as well as the problems with the noise pollution. I ask that you openly support the city of Azusa's plan to rezone the land to open space.

In addition, there are approximately 15 homeless people living in that area of the riverbed and there is concern that a stray bullet may hit them, or one of the people walking along the bike path along the river.

The gun club will be fighting to stay and the city needs all the support it can get. We would appreciate it if you could offer some kind of support of the zoning change to open space in writing.

One of the gun clubs plans is to try and move all of it onto the federal land, which is in the riverbed area. There are other gun clubs in the area, including Burro Canyon, which these gun members can use. They just don't want to bother with driving a little farther and would rather fight the city.

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Responses to Comment Letter No. 1

California Department of Conservation Division of Oil, Gas, & Geothermal Resources

- 1-1 Maps for future Master Plan projects will identify oil and gas wells on or in close proximity to project boundaries. As noted in Mitigation Measure MP-W8 (page 4.6-41), a Phase I ESA shall be completed for all projects involving substantial ground disturbance where prior land use is unknown and the potential for soil contamination from previous land uses exists. MP-W8 has been revised to state that the Phase ESA would specifically include review of California Oil and Gas Well Locations as documented by the Department of Conservation.
- 1-2 Per your comments, Mitigation Measure MP-W8 has been revised to incorporate the Division's procedures for project site review and well abandonment. In addition, Table 2-2 (page 2-6) (List of Permits, Approvals, and Coordination Potentially Relevant to Future Projects in the Master Planning Area) has been revised to reference the Division.

Appendix F – Comments and Responses

Responses to Comment Letter No. 2 California Department of Fish and Game

- 2-1 Per your comment, Mitigation Measure CD-B4 (page 4.2-46) has been revised to require a survey for nesting/breeding native bird species one week prior to construction and clearing activities. The measure has been further modified to extend the survey zone to within 300 feet (within 500 feet for raptors) of the construction zone. It is also noted that construction can proceed if no active avian nests are located during this survey. The Final EIR contains the revised text for Mitigation Measure CD-B4.

**Responses to Comment Letter No. 3
California Department of Transportation**

- 3-1 As relevant, project proponents for future Master Plan projects will be responsible for obtaining encroachment permits for activities in Caltran's rights-of-way. Please note that Table 2-2 (page 2-6, List of Permits, Approvals, and Coordination Potentially Relevant to Future Projects in the Master Planning Area) identifies Caltrans as a potentially applicable permit agency.
- 3-2 Your agency's e-mail address will be added to the Master Plan mailing list so that your agency will be informed of Steering Committee meetings, project website updates (www.sangabrielriver.com) and future CEQA notices for second-tier environmental documentation.

Appendix F – Comments and Responses

Responses to Comment Letter No. 4 Central and West Basin Municipal Water Districts

- 4-1 Per your comment in reference to the groundwater basin, “West Basin” is now consistently referred to as the “West Coast Basin” throughout the Master Plan.
- 4-2 Per your comment, the “Metropolitan Water District” is now referred consistently throughout the Master Plan as the “Metropolitan Water District of Southern California.”
- 4-3 Per your comment, “Water Reclamation Plant” is now used consistently throughout the Master Plan instead of the acronym WRP.
- 4-4 Please see response to comment 17-1. The Sanitation Districts requested that the Master Plan refer to the agency either as the “County Sanitation Districts of Los Angeles County” or “Sanitation Districts.” The Master Plan has been revised accordingly.
- 4-5 In response to your comment, text in the Master Plan on page 2-32 has been revised to clarify the relationship between the San Gabriel River and the groundwater basins as a water supply source. Text revisions and additions on pages 2-39 and 3-10 clarify the nature of adjudicated water rights and the relationships between the different groundwater basins. Revisions on page 2-30 modify text that may have given the impression that all stormwater is lost to the sea before it has a chance to percolate into the soil.
- 4-6 In response to your comment, the Master Plan has been revised to clarify the role of rainfall to groundwater basins, and groundwater is identified as a local water source. In the “Water Supply” section beginning on page 2-32, “surface and groundwater supplies” replace “rainfall” as one of the three main water supply sources, with reclaimed and imported sources as the other two. The Master Plan goes on to explain, “the local water supply begins as rainfall that percolates naturally into the underlying groundwater basins, or results in surface runoff.” Similar changes were made elsewhere in the Master Plan to clarify the relationship between rainfall and the groundwater basins.
- 4-7 Per your comment regarding Master Plan page 3-10, the correction has been made so that the sentence reads the “Central Basin Watermaster and the West Coast Basin Watermaster have the same....”
- 4-8 Per your comment, under the newly revised subsection heading “Central and West Coast Basins” the third sentence has been corrected.
- 4-9 Per your comment on Master Plan page 2-38 under the subsection “Imported Water”, the spelling for San Joaquin Delta has been corrected.

**Responses to Comment Letter No. 5
City of Cerritos**

- 5-1 Table 4.7-1 (page 4.7-4) has been revised to add the City of Cerritos determination of Master Plan consistency with the City’s General Plan Land Use Element. The Master Plan does not include any specific plans for land acquisitions or land use conversions in City of Cerritos. Land acquisitions or land use conversions for enhancement and/or protection of open space are envisioned to occur at abandoned or under-utilized properties (not at existing commercial or residential developments). The Master Plan Open Space element includes Performance Criteria O1.1 (Establishes priorities for land acquisition, coordinating targeted land acquisitions with land use planning), which is intended to encourage future project proponents to coordinate and prioritize efforts in areas that currently lack or are deficient in open space and recreational facilities. Please also note that the Master Plan goals, objectives, and performance criteria are not intended to amend or replace any existing land use regulations established by the local municipalities.
- 5-2 As noted in Table 2-2 (page 2-7), future Master Plan projects (including aesthetic enhancement projects such as gateways) may require various land use approvals (e.g., Conditional Use Permits, architectural reviews, building permits, and grading permits) from the relevant local municipality with jurisdiction over the project site. Individual project proponents would be responsible for obtaining the necessary approvals prior to final design and installation.
- 5-3 As noted in Mitigation Measures MP-W1 (page 4.6-39), MP-W3 (page 4.6-40) and MP-W5 (page 4.6-40), future projects that propose modifications to an existing flood control channel will include detailed engineering studies and agency consultations to assess potential impacts on flood control and water quality during construction and operation and identify mitigation measures as applicable; the results of these evaluations would be included in second-tier CEQA documentation prepared by the project proponent.
- 5-4 Your agency’s e-mail address will be added to the Master Plan mailing list so that your agency will be informed of Steering Committee meetings, project website updates (www.sangabrielriver.com) and future CEQA notices for second-tier environmental documentation.

Appendix F – Comments and Responses

Responses to Comment Letter No. 6 City of Santa Fe Springs

- 6-1 A description of the trails along and connecting to the San Gabriel River is provided in Section 4.10.1.1 (page 4.10-2, Recreation), and a map of bike trails and trail connections is provided in the Master Plan (Chapter 2, Map 2-3). Per your comment, Section 4.10.1.1 (page 4.10-2) has been revised to incorporate information on MTA's Bicycle Transportation Strategic Plan that is currently in preparation. The Master Plan includes the Recreation objective RC-2 (Connect open space and recreation areas with a network of trails). Implementation of future Master Plan projects in a manner consistent with this objective would result in improved bike trails, development of regional bike trail linkages, and increased access, a beneficial impact on recreation (see Sections 4.10.3 and 4.10.4.2). Per your comment, Section 4.11.4 (page 4.11-14) has been revised to describe the potential for new or improved bike trails to promote bicycling as an alternative to vehicles, a beneficial impact on transportation.
- 6-2 Per your comment, Sections 4.6.1.1 and 4.6.1.4 (pages 4.6-8 and 4.6-23) have been revised to delete references to the refinery as a discharger to the River. The former refinery has ceased discharges to Coyote Creek, and the Regional Board rescinded the NPDES permit in March 2004 (LARWQCB, 2004). (The name "Santa Fe Springs Refinery" was used in the NPDES permit to refer to the refinery, which was formerly owned by Powerine Oil Company and is now owned by Cenco Refining Company.)
- 6-3 Per your comment, Section 4.6.1.4 (page 4.6-23) has been revised to indicate that dischargers other than municipalities would also be considered in future TMDLs. A summary of the responsibilities of state and federal agencies regarding TMDLs is also provided in Section 4.6.1.4 (page 4.6-23).

Responses to Comment Letter No. 7
City of Seal Beach

- 7-1 The Master Plan is an overall conceptual plan that focuses primarily on developing the river corridor as an integrated watershed system that enhances habitat, provides recreational benefits, and protects open space, while maintaining and enhancing flood protection and water resources. The Master Plan was not developed as a regional strategy for NPDES or TMDL compliance. However, the Master Plan goals include improvements to surface water quality including stormwater flows, consistent with the goals of the municipal NPDES permits. Section 4.6.1.4 (page 4.6-20) describes the three applicable NPDES stormwater municipal permits for the project area. In response to your comment, Table 2-2 (page 2-7) has been revised to identify that review of the existing NPDES stormwater municipal permits would be required to determine if future Master Plan projects trigger the implementation of BMPs.
- 7-2 Regarding project-related impacts from stormwater runoff during construction activities, please see Section 4.6.3 (beginning on page 4.6-27). Please also note that Mitigation Measures MP-W2 (page 4.6-39) and CD-W1 (page 4.6-42) require preparation and implementation of Stormwater Pollution Prevention Plans. Please note that future Master Plan projects could result in a reduction of impervious surfaces thus reducing urban runoff and stormwater pollutant discharges to surface waters, a beneficial impact.
- Regarding potential increases in vectors or odors from Master Plan projects, please see Sections 4.5.3, 4.5.4.3 and 4.1.4.3.
- 7-3 Debris wash-down from the San Gabriel River to Seal Beach beaches is an existing problem. The loss of beach availability and resulting adverse economic impacts are not project-related impacts to be considered, evaluated and mitigated within the Program EIR. Future Master Plan projects are anticipated to reduce trash and other stormwater pollutants, a beneficial impact on downstream beaches. A debris boom is one of the potential best management practices for the control of solid waste within the river. The Master Plan is intended to encourage implementation of projects that would improve water quality. However, the Master Plan does not prescribe or mandate any specific projects or methods. If debris booms are proposed by individual project proponents, environmental impact would be evaluated in second-tier CEQA documentation.
- 7-4 The Master Plan Mitigation Measure MP-C1 (page 4.3-14) includes consultation with Native American Heritage Commission as part of initial project site evaluation for cultural resources. Some municipalities may require the presence of a qualified Native American monitor during field reconnaissance activities for future Master Plan projects under their jurisdiction. For County projects, presence of a Native American monitor during reconnaissance is not required or proposed.
- 7-5 Per your comment, Mitigation Measures MP-G1 and CD-G1 (pages 4.4-14 and 4.4-15) have been revised to indicate that storm flows will be in compliance with the applicable provisions of the relevant NPDES municipal stormwater permits.

Appendix F – Comments and Responses

7-6 Per your comment, Section 4.5.1.3 (page 4.5-3) and Mitigation Measure MP-H2 (page 4.5-20) have been revised.

7-7 The County will provide copies of the Final EIR to Mr. Whittenberg as requested.

Responses to Comment Letter No. 8
County of Orange Resources & Development Management Department

- 8-1 Per your comment, Table 2-2 (page 2-8) has been revised to include County of Orange as a potentially applicable review agency. Please note that Mitigation Measure MP-W1 (page 4.6-39) states that future projects that propose modifications to an existing flood control channel will include detailed engineering studies, including hydrologic and hydraulic modeling as applicable, to assess potential impacts on the channel's flood control capacities and effects on upstream and downstream floodplain properties and recommendations to avoid or minimize these impacts.
- 8-2 As indicated in Master Plan Chapter 3, Project ID Number R7.04 (Los Alamitos Channel Treatment Wetland) is proposed by Orange County as part of the ACOE Coyote Creek Watershed Study.
- 8-3 Per your comment, the Master Plan text regarding Project R7.08 has been revised.
- 8-4 Per your comment, Table 2-2 (page 2-8) has been revised.
- 8-5 We look forward to continuing to work with the County of Orange on the Coyote Creek Watershed Management Plan. The County intends to continue outreach to the stakeholders via periodic Steering Committee meetings and project website updates (www.sangabrielriver.com), including the County of Orange.
- 8-6 Per your comment, the Master Plan text regarding Projects R7.01 and R7.02 have been revised.
- 8-7 Per your comment, Section 4.6.1.4 (page 4.6-20) has been revised to describe the County of Orange 2003 Drainage Area Management Plan.
- 8-8 The mitigation measures listed under Section 4.6.5.2 are MP-W2 and MP-W3, not CD-W1. We understand your intent and have modified Table 2-2 (page 2-8) to indicate that future Master Plan projects located in Orange County would be required to comply with the DAMP.
- 8-9 Section 4.6.6 Mitigation Measure CD-W1 (page 4.6-42) applies only to the Concept Design Studies identified in the Master Plan. Since all five Concept Design Studies are located within Los Angeles County, the County of Orange 2003 DAMP would not be applicable; however, the Los Angeles County's Manual for the Standard Urban Storm Water Mitigation Plan (SUSMP; LADPW, 2002b) would be applicable if any of the Concept Design Studies were defined per the SUSMP as development/redevelopment projects. However, Table 2-2 (page 2-8) has been revised to indicate that future Master Plan projects located in Orange County would be required to comply with the DAMP.

Appendix F – Comments and Responses

Responses to Comment Letter No. 9 Fly Fishers Club of Orange County

- 9-1 Earlier comments provided in your email correspondence of December 2003 in response to an earlier draft of the Master Plan were used to help prepare the Public Review Draft. Changes included significant expansion and revision of the descriptions for R1.01 Fisherman's Trail above Cogswell Dam, R2.05 Float Tubing and Fishing Study, and R2.07 Flow Study below Morris Dam. Also, the river corridor policy PP15 Habitat Integration was added to the Public Review Draft due to input provided by the Fly Fishers Club of Orange County (FFCOC). As this correspondence was used to make these and other changes to the Master Plan, it is cited as a reference in the bibliography of the Master Plan.
- 9-2 On February 7, 2006, the County met with several stakeholders to discuss the concerns associated with the three FFCOC proposals. It was mutually agreed to identify the proposals as follows:
Trail Above Cogswell Dam: Project
Fishing at Morris and San Gabriel Reservoirs: Study (with a feasibility study funded by Public Works and the Upper San Gabriel Valley Municipal Water District)
Minimum Stream Flows Below Morris Dam: Due to the number of complicated issues relevant to this proposal and the difficulty reaching a consensus, it was agreed to remove this proposal from the Master Plan.

The report FFCOC sponsored was only in a specific reach of the river and focused on fishing. We chose to leave out the report because the San Gabriel River Master Plan is a document with guiding principles and vision to help project sponsors successfully implement their projects regardless of the focus.

As there is strong interest in the FFCOC proposals, the County and the Steering Committee have formed a special subcommittee, the Rivers and Recreation Technical Subcommittee, so that all parties that might be impacted can collaboratively pursue the issues raised by these proposals. The subcommittee has met in the past and will meet again in the near future to discuss recent fact-finding investigations of other reservoirs that include recreational activities.

- 9-3 This document has been prepared as a Program EIR to consider the environmental impacts, mitigation measures and alternatives of the proposed Master Plan as a whole, not each individual project. Successful implementation of a project is not dependent on being named as part of the Master Plan but rather with complying with California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA), and/or any other regulatory agency requirements. Evaluation of impacts considered the Master Plan elements (goals, objectives and performance criteria), with more detailed analysis provided for the Concept Design Studies. As future Master Plan projects are proposed for implementation, project proponents will prepare a second-tier CEQA document (a Negative Declaration or an EIR) for each project, which will analyze the site-specific

impacts of those proposals. This is the case for all Master Plan projects whether they are referred to as studies, projects, or concept design studies.

- 9-4 Habitat enhancement is one of the Master Plan goals. However, it may not be possible to incorporate habitat enhancements in all projects and maintenance activities due to the need to balance various project and stakeholder goals, which include flood control and water conservation. Future County-sponsored Master Plan projects may incorporate habitat enhancements (including movement of fish and wildlife and distribution of native plants) as feasible.

Regarding water allotments to maintain or enhance instream habitat, wildlife or recreational opportunities, water in the River is fully appropriated. Future Master Plan projects would incorporate water for habitat enhancements as feasible and consistent with existing water rights.

During the development of the Master Plan, the Master Plan Steering Committee was formed to share information regarding projects in the River corridor and funding opportunities. The Steering Committee is composed of a broad range of stakeholders, including: cities along the river; water and regulatory agencies; interested community, business, and environmental groups; and other interested individuals. However, the authority to implement Master Plan projects rests with individual municipalities and regulatory agencies. Prior to project approval, each municipality would be responsible to prepare the appropriate project-specific second-tier CEQA document. Likewise, applicable permits from various regulatory agencies such as California Department of Fish and Game, U.S. Fish and Wildlife Service, and Regional Water Quality Control Board must be obtained for construction and maintenance. These agencies are mandated to protect wildlife and habitat and, through the permitting process, would assure project conformance with applicable regulations.

Since the existing Steering Committee serves as a consensus-based forum for coordination along the River corridor, a formal administrative review panel is not proposed. However, one of the main objectives of the Steering Committee is to bring various project proponents together in order to collaboratively review and promote one another's projects.

- 9-5 The purpose of the Program EIR is to present the results of an analysis of the environmental effects of the Master Plan. As relevant, current operations are described in the Program EIR as part of existing conditions. Current operations and policies are reviewed and modified periodically when required to conform to changing operational or regulatory agency requirements. The Department of Public Works has reviewed the operations and policies at our facilities and believes it is in compliance with all state and federal regulations.
- 9-6 Section 4.6 of the Program EIR discusses the water rights and uses of the water in the San Gabriel River.

Appendix F – Comments and Responses

- 9-7 Please note that a detailed description of the water rights to surface and groundwater sources is provided in Section 4.6.1.3 of the EIR.
- 9-8 The Steering Committee has been meeting every other month, and now approximately once a quarter, for over four years during regular business hours. It was the consensus of the 80+ Steering Committee members attending these meetings and representing a very broad spectrum of stakeholders along the river corridor that this was the most effective way for them to work together as a group to shape a consensus around which the Master Plan could be developed. During this period, no other complaints were received regarding the working schedule. This consistent schedule has allowed the Steering Committee to function effectively throughout this extended time period, as evident in the continuing high level of attendance at each meeting of the Steering Committee. Additionally, email and an internet website (www.sangabrielriver.com) were used as a mechanism to reach as much of the public as feasible.
- 9-9 The Master Plan and the Draft Program EIR are available in both electronic and hard copy formats. In response to each request for a copy of the Master Plan and Draft Program EIR, a CD containing an electronic version was provided. During this period, no one requested that we instead provide them with a hard copy of the Master Plan and the Draft Program EIR. Hard copies of the Master Plan and the Draft EIR were available for public review at 19 libraries in or near the San Gabriel River corridor and at the County of Los Angeles Department of Public Works headquarters in Alhambra.

Responses to Comment Letter No. 10
Law Offices of Susan M. Trager

10-1 The specific concerns outlined in your letter are addressed below.

10-2 The Master Plan is a set of policies and actions to increase open space, habitat, and recreation opportunities in the San Gabriel River corridor. A Program EIR was prepared to consider the environmental impacts, mitigation measures and alternatives of the proposed Master Plan as a whole. Impact assessment was not limited to the 1-mile wide River corridor, but considers the area applicable to each environmental topic. Please note that specific reference (by name) to individual properties within the region, such as Rose Hills, is not needed in order to adequately describe the environmental impacts.

Regarding indirect effects, CEQA requires an evaluation of indirect effects that are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems.

An understanding of the regional setting was integral to the evaluation of environmental impacts of the Concept Design Studies, including the Discovery Center and Lario Creek projects. Significant environmental impacts were not identified for either of these projects. Specifically for the topics identified in your comment letter:

- Noise impact analysis considered impacts to the closest noise sensitive receptor (a school located across the street from the Discovery Center). Since impacts on this receptor were determined to be less than significant with implementation of mitigation measures, impacts at Rose Hills, which is located more than five times the distance away from the project site and on the other side of the Interstate 605, an existing major noise source, would be less than significant.
- Air emissions during construction and operation were estimated for each of the Concept Design Studies including the Discovery Center and Lario Creek projects. Air pollutant emissions were estimated to be below thresholds established by the South Coast Air Quality Management District in consideration of impacts to the South Coast Air Basin as a whole. Air pollutants potentially affecting views include smog-forming compounds and dust. The analysis included these parameters, and again, impacts were found to be less than significant. To further reduce project-related air quality impacts, mitigation measures were identified to reduce dust emissions during Concept Design Study construction.
- As noted in EIR Section 6.2, the Master Plan does not involve construction of new homes or businesses and does not include construction of new,

Appendix F – Comments and Responses

potentially growth-inducing, infrastructure such as roads or potable water or wastewater systems. The Master Plan would provide recreation and open space benefits to areas that have already been developed with residential, commercial, and industrial uses. Therefore, it would not result in the elimination of obstacles to growth. No growth inducing impacts would occur.

- Traffic impact analyses were conducted for the Discovery Center and Lario Creek Concept Design Studies. The analyses and summaries are explained in detail in Section 4.11 of the report. The analyses included existing and future traffic volumes and the impacts were found to be less than significant.

The Concept Design Studies were defined to illustrate the types of multi-purpose projects to be fostered by the Master Plan. The conceptual project descriptions detailed in the Master Plan and the EIR are the result of a Steering Committee exercise to help provide tangible examples of how the Master Plan multi-objective approach might apply to projects in the San Gabriel River corridor. These studies are intended for illustration purposes only and do not necessarily reflect the intent of the project sponsors. Environmental analysis in this Program EIR is based on the conceptual project descriptions in the Master Plan. The final project concepts for Lario Creek and the Discovery Center are still under development. Therefore, it would be too speculative at this time to complete the detailed analysis recommended. Further environmental documentation for Concept Design Studies will be conducted when the project descriptions for these proposals are formalized. Additional noise, aesthetic, air quality and/or traffic studies may be conducted at that time as necessary.

- 10-3 Since the project descriptions for the Concept Design Studies are conceptual and are subject to change, the Program EIR is not a project-level review of the Concept Design Studies, but instead analyzes their impacts (as best as can be determined at this preliminary stage in their design) as examples of Master Plan projects and the types of impacts expected. Further environmental documentation for Concept Design Studies will be conducted when the project descriptions for these proposals are formalized.
- 10-4 The purpose of the Program EIR was to evaluate the impacts of the Master Plan as a whole. The data on existing conditions, CEQA thresholds of significance, and the programmatic analyses and mitigation measures presented in the Program EIR will serve as a source of background information and model to guide further project-level CEQA review for the Concept Design Studies, and other Master Plan projects. The Program EIR will streamline the environmental review and documentation process for future Master Plan project proponents in the river corridor.
- 10-5 Rose Hills will be added to the notification list for CEQA documentation for all County-sponsored Master Plan projects.
- 10-6 Potential impacts from a rise in the groundwater table related to increased recharge are described in Sections 4.6.3, 4.4.3, and 4.6.4.5. Quantification of these impacts through modeling or other analysis can only be completed when specific recharge locations and

water volumes are defined. Since these specifics are not yet defined, Mitigation Measure MP-W7 (page 4.6-41) was defined to require consideration and mitigation, if applicable, of existing groundwater contamination and potential contaminant sources. Under Mitigation Measure MP-W7, project-specific analysis for future groundwater recharge projects would consider the aerial extent of any groundwater mound created by recharge and the potential for changing groundwater levels below your property. Please see minor revisions to MP-W7 to clarify that all contaminant sources, not just landfills, will be considered. Similarly, Mitigation Measures MP-G1 (page 4.4-14) and CD-G1 (page 4.4-15) require consideration, and mitigation if applicable, of increases in liquefaction potential associated with recharge projects.

Additionally, the monitoring well which is located within 200 feet of Rose Hills has an average elevation of 100 feet. The highest elevation recorded for this well is 103 feet in 1963. At 103 feet, the elevation of the water table is still more than 10 feet below the surface of Rose Hills.

- 10-7 The County is committed to recognizing the concerns of all stakeholders as part of the Master Plan process.

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Responses to Comment Letter No. 11 Main San Gabriel Basin Watermaster

- 11-1 Table 2-1 (page 2-7) has been revised to incorporate your correction.
- 11-2 The Concept Design Studies were defined by the Steering Committee to protect and enhance, whenever possible, flood protection, water supply and water quality. Table 3-7 (page 3-15) indicates that flood protection, water supply and water quality are objectives of each of the Concept Design Studies.
- 11-3 Table 4.6-2 (page 4.6-6) has been revised to indicate the approximate capacities as determined by the most recent surveys of the reservoirs.
- 11-4 Master Plan projects that include stormwater infiltration would be designed to protect or enhance groundwater quality. Per your comment, the policy listed in Section 3.3.1.2 (page 3-12) of the EIR (and PP11 in the Master Plan) has been revised to clarify this intent.

Regarding groundwater monitoring, please note that Mitigation Measures MP-W6 (page 4.6-40) and CD-W5 (page 4.6-43) provide for development and implementation of a comprehensive groundwater monitoring program. These monitoring programs would include measurement of all applicable parameters, including nitrate.

Please also note that Mitigation Measure MP-W7 (page 4.6-41) provides for evaluation of potential impacts to existing groundwater contamination plumes and implementation of measures to avoid interference. As part of the investigation, relevant agencies, including the Regional Board, Watermasters, and agencies involved in groundwater clean-up activities (e.g., EPA and WQA), will be consulted.

- 11-5 The Concept Design Studies were defined to illustrate the types of multi-purpose projects to be fostered by the Master Plan. The conceptual project descriptions detailed in the Master Plan and the EIR are the result of a Steering Committee exercise to help provide tangible examples of how the Master Plan multi-objective approach might apply to projects in the San Gabriel River corridor. These studies are intended for illustration purposes only and do not necessarily reflect the intent of the project sponsors. Environmental analysis in this Program EIR is based on the conceptual project descriptions in the Master Plan. Further environmental documentation for Concept Design Studies will be conducted when the project descriptions for these proposals are finalized.

As described in Section 3.3.3.1, a floating island is a potential element of the San Gabriel Spreading Grounds Concept Design Study. If a floating island is included in the final project description, any conflict with the existing operation and maintenance activities for groundwater recharge (including water quality, water supply, and regulatory issues) would be considered.

Implementation of the Master Plan would have a beneficial impact on groundwater recharge by encouraging projects that reduce runoff discharges into waterways and/or expand reclaimed water use. Throughout our system of groundwater recharge facilities, the County is committed to maintaining or increasing total percolation capacity. Regarding security at the San Gabriel Spreading Basins, public access will remain restricted near the basins and the City of Azusa parcel to maintain public safety and water quality.

In response to your comments, an additional performance criterion was added to the Habitat Element (H2.10), which reads “Encourages development of new habitats without compromising essential public services including groundwater recharge, flood protection, or electrical power transmission by offering legal and operational safeguards such as memoranda of understanding that allow access for regular maintenance and emergency operations.”

- 11-6 Per your comment, Section 3.3.3.4 (page 3-29) has been revised to note that the maximum recorded flow at F313B-R was 227 cfs (recorded on 12/28/2002).

The Lario Creek Concept Design Study project description in the Master Plan was intended for illustration purposes only and is not considered the final project description. Therefore, the necessity for modifying gaging station F313B-R is undetermined at this time. However, the County is committed to providing accurate data necessary for flow analysis to the Watermaster.

- 11-7 Per your comment, Section 4.6.1.1 (page 4.6-29) has been revised to note that flows significantly above 100 cfs have also been recorded during storm events. The maximum recorded flow at station E322 on the San Gabriel River at Peck Road was 24,800 cfs (recorded on 1/26/1969).

- 11-8 Per your comment, Section 4.6.1.1 (page 4.6-8) has been revised.

- 11-9 The Master Plan goals include maintenance of existing water and other rights while enhancing water quality, water supply, groundwater recharge, and water conservation. However, since the overall impact of the Master Plan would be to reduce ocean discharge of valuable freshwater resources, the implementation of projects with features that retain, reuse and/or infiltration stormwater would have an overall beneficial impact on groundwater volumes. Prior to implementation of County-sponsored Master Plan projects with reuse of stormwater runoff, the County will consult with the Watermaster.

- 11-10 Per your comment, Section 4.6.1.3 (page 4.6-14) has been revised.

- 11-11 Per your comment, Section 4.6.1.3 (page 4.6-16) has been revised.

- 11-12 Per your comment, Section 4.6.1.4 (page 4.6-25) has been revised.

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Responses to Comment Letter No. 12 Metropolitan Water District of Southern California

- 12-1 Maintaining and enhancing water resources is one of the Master Plan goals. Per your comment, the Master Plan has been revised to acknowledge protection of groundwater recharge capacity (see Performance Criteria H2.5). The overall implementation of the Master Plan would have a beneficial impact on groundwater recharge by encouraging projects that reduce runoff discharges into waterways and/or expand reclaimed water use. Regarding the potential for development of floating islands at the San Gabriel Canyon Spreading Grounds, please also see response to comment 11-5.

For projects involving habitat enhancements, the project proponents would be responsible to consult with applicable wildlife and regulatory agencies and obtain operations and maintenance agreements that address the potential for habitation by sensitive species as a direct result of the habitat enhancements. Please note that Table 2-2 (page 2-6) has been revised to clarify that this type of coverage for operation and maintenance activities may be applicable.

In response to your comments, an additional performance criterion was added to the Habitat Element (H2.10), which reads “Encourages development of new habitats without compromising essential public services including groundwater recharge, flood protection, or electrical power transmission by offering legal and operational safeguards such as memoranda of understanding that allow access for regular maintenance and emergency operations.”

- 12-2 Mitigation Measure MP-G1 (page 4.4-14) requires future Master Plan projects that include infiltration to conduct geotechnical investigations. Per your comment, Mitigation Measure MP-G1 has been revised to specifically reference pipelines.

Responses to Comment Letter No. 13
Puente Hills Landfill Native Habitat Preservation Authority

- 13-1 In response to your comment, the following clarification regarding the project boundary has been added to the Master Plan text on page 1-7 and EIR Section 3.2.1 (page 3-1): “This one mile wide corridor provides a necessary focus for the Master Plan study area but is not meant to be a totally exclusive boundary. Some projects and programs located nearby but outside the one-mile wide study area are included if they are designed to contribute to the vision and goals of the Master Plan.”
- 13-2 Per your comment, Table 2-1 (page 2-7) has been revised.
- 13-3 In response to your comment, Performance Criteria H4.3 (EIR Section 3.3.1.1, page 3-7) has been revised to read as follows, “Utilizes ecologically responsible techniques to maintain or reduce populations of wildlife meso-predators (raccoon, feral cats, opossum, skunk) and rodents that may transmit vector-borne diseases and discourages wildlife encroachment into surrounding urban areas.”
- 13-4 Per your comment, your suggestion has been incorporated into the description for project R4.23 Puente Hills Western Wildlife Corridor. Per your comment, the Master Plan Chapter 4.2 has been revised to include park visitors as target audience for the educational materials regarding co-existing with wildlife. Please note that Map 4-1 shows both northbound and *southbound* wildlife movements.
- 13-5 For future Master Plan projects that involve vegetated wetlands or other potential wildlife habitat, balancing the various project objectives (water quality improvement, groundwater recharge, and/or habitat) and operational and maintenance needs of the facilities (vegetation management for vector control, etc.) would be part of the project planning process. While maintenance activities would temporarily anticipated newly vegetated or enhanced areas, the overall impact of the Master Plan on biological resources would be beneficial as compared to existing conditions. In addition, the description for project R4.24 Equestrian Facilities Enhancement has been modified to address these concerns.
- 13-6 The County acknowledges the Authority’s concerns related to potential future Master Plan projects involving groundwater recharge that may be located within lands owned/managed by the Habitat Authority. As noted in Section 2.3.2 (page 2-4), as future Master Plan projects are proposed for implementation, project proponents will prepare a second-tier CEQA document (a Negative Declaration or an EIR) for each project, which would include evaluation of potential impacts (including park operations, wildlife, utilities and conservation easements, as relevant). Project proponents would also be responsible for coordination with various agencies that have jurisdiction over project sites or activities. Per your comment, Table 2-2 (page 2-7) has been revised to add the Authority as potentially applicable reviewing agency.

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Responses to Comment Letter No. 14 San Gabriel River Water Committee

14-1 Please see responses to comments 11-4 and 11-9.

14-2 Please see response to comment 11-2.

14-3 Please see response to comments 11-5 and 12-1.

14-4 Please see response to comment 11-7.

14-5 Please see response to comment 11-8.

14-6 Please see response to comment 11-10.

Responses to Comment Letter No. 15
San Gabriel River Watermaster

- 15-1 Comment noted. As noted in Section 4.6.4.7, groundwater use included as part of a future project design would be implemented within the confines of existing groundwater rights. Similarly, water consumption associated with future projects that include planting of riparian vegetation in existing channels (i.e., increased evapotranspiration) would be implemented within the confines of existing surface water rights.
- 15-2 Per your comment, Section 4.6.1 (page 4.6-1) has been revised. Please note that, overall, implementation of the Master Plan would have a beneficial impact on groundwater recharge by encouraging projects that reduce runoff discharges into waterways and/or expand reclaimed water use. Therefore, the County considers the Master Plan to be consistent with preservation of the valuable local water sources.
- 15-3 The Lario Creek Concept Design Study project description in the Master Plan was intended for illustration purposes only and is not considered the final project description. Therefore, the necessity for modifying gaging station F313B-R is undetermined at this time. However, the County is committed to providing accurate data necessary for flow analysis to the Watermaster.
- 15-4 Please see responses to comments 11-5 and 12-1.

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Responses to Comment Letter No. 16 San Gabriel Valley Mosquito & Vector Control District

- 16-1 As noted in Table 2-2 (page 2-7, List of Permits, Approvals, and Coordination Potentially Relevant to Future Projects in the Master Planning Area), the County would consult with relevant vector control agencies for applicable County-sponsored Master Plan Projects. For other Master Plan projects, the individual project proponents would be responsible for consulting the vector control agencies.
- 16-2 Section 1 has been revised to reflect the changes made to the other sections of the EIR per your comments.
- 16-3 Per your comment, Table 2-1 (page 2-2) has been revised.
- 16-4 Per your comment, Section 2.7 (page 2-9) has been revised.
- 16-5 Per your comment, the introductory paragraph to Section 4.5 (page 4.5-1) has been revised.
- 16-6 Section 4.5.1.4 (beginning on page 4.5-4) has been revised to incorporate your comments and suggested text, with some editorial changes.
- 16-7 Per your comment, Section 4.5.2 (page 4.5-10) has been revised, with the exception of the deletion of “at pre-project levels.” Please note that CEQA review is focused on adverse impacts resulting from projects as compared with existing conditions.
- 16-8 Per your comment, Section 4.5.3 (page 4.5-10) has been revised.
- 16-9 The County of Los Angeles appreciates the concerns of the vector control agencies, and is committed to promoting appropriate vector control procedures at all relevant Master Plan projects. Please note, however, that with implementation of the outlined mitigation measure, the increase in vector-related public health impacts from the Master Plan would be less than significant as compared with existing conditions. However, this CEQA impact determination is not intended to imply that the Master Plan mitigation measures will mitigate existing vector conditions throughout the study area and alleviate all public health risks.
- 16-10 Per your comment, Table 4.5-2 (beginning on page 4.5-11) has been revised. Please note that the reference to the Health and Safety Code has been incorporated into Section 4.5.1.4 (Existing Setting).

Your comment that constructed wetlands and other facilities would impact public health in violation of the Health and Safety Code has not been incorporated since the reference to the Health and Safety Code has been incorporated in Section 4.5.1.4 (page 4.5-4) as noted above.

- 16-11 Per your comment, Section 4.5.4.1 (page 4.5-15) has been revised.
- 16-12 The County’s determination that the risks of the bird/wildlife aircraft strike hazard would be less than significant at the Woodland Duck Farm and the El Dorado Regional Park Concept Design Study sites is based on existing bird use of the site and the relative sizes of the proposed habitat enhancements. Due to the highly urbanized nature of the project area and the continuing influence of human activity thus reducing the attractiveness of the created habitat to wildlife, a substantial increase in waterfowl population is not anticipated.
- 16-13 The County acknowledges the vector control agencies’ concern regarding covered or underground stormwater capture/treatment devices. Section 4.5.4.3 (page 4.5-17) has been revised to reflect your comments. Please note, however, that surface (as opposed to underground or covered) stormwater control/treatment features are more likely to be implemented as part of future Master Plan projects since the Master Plan promotes multi-objective projects and surface features have the potential to provide multiple benefits (recreation, habitat, aesthetic, flood control, and/or water quality). Please also see responses to your comments below regarding Section 4.5.4.3.
- 16-14 Per your comment, Mitigation Measures MP-H1 (page 4.5-20) and CD-H1 (page 4.5-21) have been revised to add that catch basins must be designed so that all runoff would flow into the downstream facilities without ponding.
- 16-15 Per your comment, Mitigation Measures MP-H1 (page 4.5-20) and CD-H1 (page 4.5-21) have been revised to incorporate your comments.
- 16-16 Per your comment Section 4.5.4.3 (page 4.5-17, Retention Basins) has been revised to incorporate your comments. The second sentence has not been deleted since retention basins (as opposed to detention basins) would be designed to infiltrate.
- 16-17 Per your comment Section 4.5.4.3 (page 4.5-17, Stormwater Wetlands) has been revised.
- 16-18 Per your comment Section 4.5.4.3 (pages 4.5-17 and 18, Permanent Lakes) has been revised.
- 16-19 Please see response to comment 16-9.
- 16-20 Per your comment Section 4.5.1.4 (page 4.5-4, Existing Setting) has been revised to incorporate a reference to the California Health and Safety Code. Your suggested text change to the second sentence in the third paragraph has not been incorporated. The County acknowledges that increases in midges and black flies would constitute a nuisance, but the impact of the Master Plan related to this nuisance would be less than significant since they do not transmit diseases to humans.
- 16-21 Per your comment, the last paragraph of Section 4.5.4.3 (page 4.5-18) has been revised.

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- 16-22 Per your comment, Section 4.5.5.2 (page 4.5-19) has been revised.
- 16-23 Per your comment, Section 4.5.5.2 (page 4.5-19) has been revised to delete the word “insect”.
- 16-24 To be consistent with the California Health and Safety Code, the term “district” will be utilized throughout the document.
- 16-25 Section 4.6.1.4 (page 4.6-20) has been revised to cross-reference Section 4.5.1.4, where a reference to the California Health and Safety Code has been added per your comment.
- 16-26 Per your comment, Section 4.9.1.3 (page 4.9-5) has been revised to add a cross-reference to Section 4.5.4.3, where text has been added regarding the potential for underground utility vaults to breed mosquitoes. In addition, Mitigation Measure MP-H1 (page 4.6-20) has been revised to incorporate your comment.
- 16-27 Per your comment, Section 5.3.2.4 (page 5-10) has been revised to acknowledge that any of the related projects may include stormwater best management practices that could create mosquito habitat. However, since the Master Plan incorporates mitigation measures for vector control, and the extent of mosquito habitat potentially created by any stormwater BMPs associated with the related projects is not known, a cumulatively considerable increase in vector-related public health risks is not anticipated based on available information.

The Master Plan goals include balancing enhancements to habitat, recreation, and open space while maintaining and enhancing flood protection and water resources; therefore, the extent of habitat enhancements that can be achieved along the River corridor would be moderated by these other objectives. Furthermore, the Master Plan Habitat element includes Performance Criteria H.2.5 and H.4.3, which are intended to encourage future Master Plan project proponents to consider the public health implications of habitat enhancement projects early in the planning process. Therefore, the Master Plan would not result in a cumulatively considerable increase in risks to public health associated with increased human-wildlife interactions.

Responses to Comment Letter No. 17
County Sanitation Districts of Los Angeles County

- 17-1 Per your comment, the Master Plan and the EIR have been revised.
- 17-2 Per your comment, the Master Plan has been revised.
- 17-3 Per your comment, the Master Plan has been revised.
- 17-4 Per your comment, the Master Plan and the EIR have been revised.
- 17-5 Per your comments, the Master Plan and the EIR have been revised.
- 17-6 Per your comment, the Master Plan has been revised.
- 17-7 Per your comment, the Master Plan has been revised.
- 17-8 Per your comment, the Master Plan has been revised.
- 17-9 Per your comment, the Master Plan has been revised.
- 17-10 In response to your comment, the reference to Department of Fish and Game standards has been deleted from page 3-69 of the Master Plan.
- 17-11 In response to your comment, the text on Master Plan page 3-69 has been modified.
- 17-12 Per your comment, the Master Plan has been revised.
- 17-13 Table 2-2 (page 2-8, List of Permits, Approvals, and Coordination Potentially Relevant to Future Projects in the Master Planning Area) has been revised to reference the Districts. Please also note that for future projects that include construction of pipelines or other underground structures, Mitigation Measure MP-P3 (Section 4.9.5.3, page 4.9-16) requires consultation with relevant utilities (including sewers) to identify existing and proposed buried facilities in affected areas.
- 17-14 Per your comment, Table 4.6-4 (page 4.6-9) has been revised.

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Responses to Comment Letter No. 18 Southern California Association of Governments

18-1 The County appreciates your acknowledgement of the discussion provided in the Program EIR regarding the Master Plan's consistency with SCAG plans and policies.

Responses to Comment Letter No. 19
Southern California Edison

- 19-1 The County will involve Southern California Edison (SCE) early in the conceptual planning stage for all Los Angeles County sponsored projects along the river corridor that may be located in or near SCE’s right-of-way. Other project sponsors would be responsible for consulting SCE for applicable projects. Per your comment, Table 2-2 (page 2-8, List of Permits, Approvals, and Coordination Potentially Relevant to Future Projects in the Master Planning Area) has been revised to include SCE.

We commend your willingness to collaborate with the County to provide a higher quality of life for the citizens of Los Angeles County. We also encourage SCE to explore the possibility of expanding the realm of the possible within SCE’s properties or easements. Developing partnerships and collaborations among agencies will ensure mutual benefits for all.

- 19-2 The County is fully aware of and acknowledges the vital importance of SCE’s stewardship and regulatory requirements. We believe that SCE’s Secondary Land Use Program objectives to achieve a balance of uses, including low-intensity, green/passive recreational uses, and low-intensity economic development, are compatible with the multi-objective character of the Master Plan. The Master Plan also strives to achieve a balance among the several objectives of habitat, recreation, open space, and economic development, along with flood protection, water quality, and water conservation.

Given these similar underlying principles, the County looks forward to working closely with SCE over the coming years in finding ways to introduce habitat, recreation, open space as well as economic development uses to the river corridor in ways that are fully compatible with both the vision of the Master Plan and essential utility system operations, and stewardship requirements of SCE.

- 19-3 In addition to consulting with SCE on a regular basis for future County-sponsored projects that may be in or near SCE rights-of-way, we will also rely on the guidance and design criteria provided in “Southern California Edison Rights-of-Way Constraints Guidelines.”

We will also recommend to other project sponsors within the river corridor that they refer to this same document in the design and development of their respective projects. It is also suggested that this be a topic at a future meeting of the Master Plan Steering Committee, at which representatives of SCE could present these guidelines to members of the Steering Committee as well as distribute the official SCE guidelines document to all interested stakeholders. Your recent collaborations with the City of Long Beach, as well as the Woodlands Duck Farm, could also be presented as positive working models for future partnerships.

- 19-4 The County acknowledges its shared commitment with the SCE to work together to achieve a balance of compatible uses along the San Gabriel River, and welcomes its input

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regarding the Master Plan. The County believes most of the proposed projects within the Master Plan are compatible with SCE operations and maintenance requirements but that all proposed projects would be subject to possible revision to avoid potential problems and impacts. Such revisions would likely stem from the following two requirements as set forth in your letter dated May 4, 2005:

- SCE requires ongoing, complete access to its rights-of-way in order to perform routine maintenance and any required emergency repair or restoration of the facilities located there. No project, facility or operation can be allowed within its rights-of-way that would limit or impede such essential access or impact SCE's existing and future operating systems whether in the immediate project area or anywhere else in SCE's existing and future operating systems whether in the immediate project area or anywhere else in our rights-of-way and operating system.
- Establishing new wetlands or other similar natural habitat, vegetation or related natural plant areas within SCE's rights-of-way may be incompatible with SCE's operational requirements because they impede access to SCE operating systems and potentially impact the integrity of electric system operations. Such projects should be sited elsewhere in more appropriate locations. Prior to planning such projects, proponents must discuss any such proposals with SCE. SCE reserves the right of final approval for any projects utilizing SCE rights-of-way.

In principle, the County accepts and acknowledges these requirements and welcomes the opportunity to work with SCE and other involved project sponsors on any of the specific projects identified to ensure their compatibility with SCE operating requirements. This includes, but is not limited to, the following three projects:

- R5.16 – Wilderness Park Reclaimed Water and Open Space Park
- R6.03 – Byron Zinn Park Improvement
- R6.21 and R6.23 – El Dorado Regional Park Wetlands and Master Plan Update

It also extends to other projects and programs that may cross SCE rights-of-way, but whose potential development can be compatible with SCE operating requirements if they can be designed to meet the critical design and siting principles outlined above.

The County will work with SCE and recommend that all project sponsors work with SCE from the conception to completion stage to ensure all your concerns are adequately addressed.

- 19-5 The County looks forward to further discussions with SCE regarding proposed habitat restoration opportunities in the Reach 4 area, as it relates to any potential development of open space as a habitat easement within SCE's rights-of-way. Such discussions can further explore the extent of the potential constraints you have identified and whether and/or to what extent proposed "safe harbor agreements" might provide the legal or operational safeguards essential to SCE's operating requirements.

- 19-6 The County welcomes your assessment that trail enhancements, in particular for hiking and non-motorized biking, are feasible in many locations within SCE’s rights-of-way. The County will also work closely with SCE in the development of all such trail enhancements on a project-specific basis, and will recommend that all other project sponsors follow the same collaborative practice as well.
- 19-7 The County and SCE do share the goals of using a balanced approach to protect existing green/passive recreational open spaces and creating new opportunities for such spaces along the river corridor where they are compatible with SCE system operating requirements. The County also recognizes your concern that conservation easements and “safe harbor agreements” may not be suitable with SCE’s system operating requirements, but also believes the likely benefits and possible drawbacks of such agreements should be further explored with SCE before reaching a final decision on their potential application in any future projects.
- 19-8 The County agrees that it must work closely with SCE on any proposed plans related to the expansion of the river channel and/or removal of concrete along the river channel, as referred to in the El Dorado Regional Park area, or any other activities that could impact SCE’ system operations. Please note that these are only proposals and the viability of such proposals depends on an assessment of a range of factors, of which compatibility with SCE operating requirements is only one of many.
- 19-9 The County acknowledges SCE concerns regarding the development of wetlands or other similar habitats within SCE rights-of-way, which may be incompatible with SCE’s operations and access. The County welcomes SCE willingness to consider the option of supporting such projects on other nearby or adjacent properties by possibly providing expanded green/passive recreation uses on SCE property along the river where appropriate and viable. Given the extent of SCE property along the river, the County further welcomes SCE commitment to work with the County and other stakeholders to identify possible areas where SCE can be of assistance.
- 19-10 The County acknowledges and welcomes the SCE commitment to work closely with the County on crafting policies related to designs and uses along the river corridor that are compatible with SCE’s operations and that do not impose unnecessary operational or financial burdens on the company or the users of its property.
- 19-11 The County acknowledges SCE concerns regarding the possible incompatibility of SCE operations and access with the proposed development of wetlands and related habitat areas on this property, and that “safe harbor agreements” may not be sufficient mechanisms to ensure SCE access to its operating property. The County welcomes SCE’s continued willingness to work closely with the County on further exploring these questions.
- 19-12 The County acknowledges SCE’s concerns regarding proposed alignments for Lario Creek. Given the need to ensure SCE’s ability to maintain, operate, and possibly expand

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its existing facilities within its rights-of-way, and to address potential safety risks to the visiting public, the County will consult closely with SCE regarding all these issues.

- 19-13 The County acknowledges that SCE will require additional information for any proposed project along the river corridor that crosses SCE's rights-of-way, in order to assess potential impacts on SCE's operations. For County-sponsored projects, the County will provide that information to SCE and work closely with SCE on exploring ways in which such projects might be able to function within SCE's rights-of-way without substantial interference with SCE's operations. The County will also recommend that sponsors of other projects that may cross SCE's rights-of-way work closely with SCE by providing all needed information for assessment of potential impacts.

The County also acknowledges that there will be costs incurred by all stakeholders in the development of Master Plan projects. We will encourage all project sponsors to consider these costs in the beginning stages of each project.

- 19-14 The County also believes there are many areas along the San Gabriel River corridor where it will be possible for the County and SCE to collaborate on achieving a balance of desirable and appropriate uses, and where SCE can offer the use of needed property to the County and other involved parties to help achieve the vision and goals of the Master Plan. The County acknowledges that there may be some projects in some locations that may not be compatible with SCE's operational and maintenance requirements and responsibilities for existing and future facilities. Given the critical nature of these facilities, the County looks forward to working with the SCE on a continuing basis to ensure that the vision of the Master Plan can move forward but in full alignment with SCE's operational and maintenance requirements.

The County understands SCE's need for operation and maintenance of their facilities within the Master Plan project area. The County has always and will continue to partner with SCE to work together for a successful completion of projects which benefit and enhance each others operations as well as encourage other stakeholders to do the same.

Responses to Comment Letter No. 20
Southern Council of Conservation Clubs

20-1 The County acknowledges your concurrence with the Master Plan and your support for the maximum habitat alternative. Please note, however, that the maximum habitat alternative is not selected as the proposed project since it would fail to meet the goal of balancing habitat, recreation, and open space, as intended by the Board of Supervisors' resolution and as defined by the project objectives (see Section 6.1.2, beginning on page 6-5).

The County is committed to continuing to involve all stakeholders, including hunters and fishermen.

20-2 While some future Master Plan projects may involve habitat enhancements in areas where mountain lions and/or bighorn sheep may be present (West Fork of the River and associated canyons in the San Gabriel Mountains), implementation of the Master Plan would not affect the ecological relationship that has always existed between mountain lions and bighorn sheep.

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Responses to Comment Letter No. 21 United Rock Products

- 21-1 The County acknowledges your concerns regarding future projects that may impact your operations and welcomes your continued participation in the Master Plan process. Future notifications to stakeholders (including United Rock Products) by the County will include e-mail notification of Steering Committee meetings, project website updates (www.sangabrielriver.com) and future CEQA notices for second-tier environmental documentation.

Responses to Comment Letter No. 22
Vulcan Materials Company Western Division

22-1 As noted in Section 4.7.1 (page 4.7-3), the Master Plan goals, objectives, and performance criteria are not intended to amend or replace any existing land use regulations. As described in Section 4.7.3 (page 4.7-15), the Master Plan envisions that future Master Plan projects that involve mine reclamation would be implemented based on negotiation and partnership with the current owners and operators. Therefore, such projects under the Master Plan are anticipated to take place after extraction of mineral resources has been completed. However, if a future Master Plan project involves development of facilities that would result in the restriction of future mineral extraction operations, the potential impact of the project on mineral resources would be evaluated and disclosed in second-tier CEQA documentation (see Section 4.7.5.1).

The Master Plan goals include maintenance of existing water and other rights while enhancing water quality, water supply, groundwater recharge, and water conservation. Please also see response to comment 11-9.

22-2 The County acknowledges Vulcan's commitment to enhancing the River system and welcomes Vulcan's continued participation in the Master Plan process.

22-3 The comments originally submitted by Vulcan Materials Company on Nov 23, 2003 were used to help revise an earlier draft of the Master Plan, and for that reason are cited as a reference in the bibliography.

22-4 Future notifications to stakeholders (including Vulcan) by the County will include e-mail notification of Steering Committee meetings, project website updates (www.sangabrielriver.com) and future CEQA notices for second-tier environmental documentation. The County welcomes Vulcan's continued participation in the Master Plan process.

Appendix F – Comments and Responses

Responses to Comment Letter No. 23

Mr. Robert Dale

- 23-1 The County acknowledges your support for efforts to improve the river corridor's environmental quality and recreational opportunities. The Master Plan's vision is to develop the River corridor as an integrated watershed system that enhances habitat, provides recreational benefits, and protects open space while maintaining and enhancing flood protection and water resources. Please also see response to comment 10-2.

Implementation of Master Plan projects in a manner consistent with the Master Plan's Water Quality and Water Supply goal would reduce urban runoff and stormwater pollutant discharges to surface waters. In addition, the County of Orange is developing the Coyote and Carbon Creek Watershed Management Plan, listed as project R7.01 in the Master Plan, which will directly address urban runoff from inland communities in Orange County, including La Habra.

- 23-2 The Master Plan includes the Flood Control goal, which is intended to encourage projects that improve flood protection using natural processes and/or improve the aesthetics of flood control facilities. The County also acknowledges your support for improving riparian habitat and new or improved educational nature centers.

- 23-3 The County acknowledges your support for improved bike trails and linkages. The Master Plan includes the Recreation objective RC-2 (Connect open space and recreation areas with a network of trails). Implementation of future Master Plan projects in a manner consistent with this objective would result in improved bike trails (including more amenities such as shade trees, landscaping and rest areas), development of regional bike trail linkages, and increased access.

The Master Plan encourages the development of east-west trail connections to the San Gabriel River Bike Trail. This includes project R5.05 Whittier Greenway Trail and Connection being built along an abandoned railroad right-of-way, which, when completed, would extend from the San Gabriel River in Whittier through the City of La Habra to the City of Brea.

Per your comment regarding extending the Coyote Creek Bike Lane north to La Habra, please note that the project description for R7.02 Coyote Creek Regional Bikeway Improvements has been updated based on new information provided by the County of Orange.

- 23-4 While the Master Plan goals, objectives, and performance criteria are not intended to amend or replace any existing land use regulations, implementation of the Master Plan would have beneficial impacts with respect to land use by encouraging projects that protect/enhance land uses (e.g., open space) that enhance the character of the communities in the River corridor (see Section 4.7.3, page 4.7-14).

Responses to Comment Letter No. 24
Mr. Lester Kau

24-1 The County appreciates your interest in the Master Plan, and has reviewed and considered your comments. Los Angeles County has reviewed the information provided regarding the San Gabriel Valley Gun Club and the City of Azusa's zoning of the land to open space. Please note that the proposed Master Plan does not specifically propose zone changes to parcels along the river corridor, and the County has no jurisdiction over City of Azusa land use decisions. As noted in the Master Plan (R3.10 West Riverbank Tree Planting Project at the San Gabriel Valley Gun Club), a tree planting project is proposed at the gun club site. The County of Los Angeles does not have any zoning jurisdiction over the area discussed in your letter. We encourage you to contact the City of Azusa's Planning Division regarding your concern.