PALMDALE RECYCLED WATER AUTHORITY (PRWA)
PALMDALE WATER DISTRICT
2029 EAST AVENUE Q
PALMDALE, CALIFORNIA
REGULAR MEETING AGENDA NO. 15
JANUARY 21, 2015
7:00 P.M.

www.cityofpalmdale.org
www.palmdalewater.org

WELCOME

NOTE*:* Materials related to an item on this Agenda submitted to the Palmdale Recycled Water Authority Board of Directors, or after distribution of the agenda packet, are available for public inspection at the City of Palmdale City Hall, located at 38300 Sierra Highway, Suite A, Palmdale, California, and at the Palmdale Water District, 2029 East Avenue Q, Palmdale, California during normal business hours and will also be available at the meeting. Those items provided by others at the meeting will be available at City Hall during normal business hours.

A **three-minute time limit** will be imposed on all speakers other than staff members.

In accordance with the Americans with Disabilities Act of 1990, if you require a disability-related modification or accommodation to attend or participate in this meeting, including auxiliary aids or services, please call the Palmdale Water District at least 48 hours prior to the meeting.

Your courtesy is requested to help our meeting run smoothly. If you'll be kind enough to follow these simple rules, we can make the best possible use of your time and ours:

- Please refrain from public displays or outbursts such as unsolicited applause, comments, cheering, foul language, or obscenities.
- Any disruptive activities that substantially interfere with the ability of the Board of Directors to carry out its meeting will not be permitted and offenders will be requested to leave the meeting.
- Please turn off cell phones and pagers.

1. CALL TO ORDER.

2. PLEDGE OF ALLEGIANCE.

3. ADMINISTRATION OF OATH OF OFFICE TO APPOINTED DIRECTORS. DIRECTORS JAMES C. LEDFORD, JR., KATHY MAC LAREN, ROBERT ALVARADO, FRED THOMPSON, HELEN VELADOR, AND ALTERNATE DIRECTOR VINCENT DINO. (Staff Reference: Authority Secretary Smith)

4. ROLL CALL: DIRECTORS JAMES C. LEDFORD, JR., KATHY MAC LAREN, ROBERT ALVARADO, FRED THOMPSON, AND HELEN VELADOR

5. WAIVER OF FULL READING OF RESOLUTION(S).

Motion: Move to waive full reading of the Resolution(s) to be considered and voted on at this meeting. (**Vote by Roll Cal**l - Requires a majority to waive.)

6. CONSENT CALENDAR – PUBLIC COMMENTS ONLY: If you wish to comment on any item(s) listed on the Consent Calendar on this agenda, please come forward to the podium and state the item number(s) and your comments. **PLEASE NOTE: A three-minute time limit** will be imposed on each speaker other than staff members.

7. CONSENT CALENDAR:

NOTICE: All matters listed under the Consent Calendar will be enacted by one motion unless an item(s) is pulled by the Board, in which case the item(s) will be removed from the Calendar and will be considered separately following this portion of the Agenda.

7.1 Approve the Minutes from the previous meeting held December 17, 2014 (7pm). (Staff Reference: Authority Secretary Smith)

7.2 Approve Receipt and Filing of the Treasurer's Report through the month ended December 31, 2014. (Staff Reference: Treasurer/Auditor Johnston)

Staff Recommendation: Move to approve the recommendations and findings on all items listed under this Consent Calendar. (**Vote by Roll Call** - Requires a majority to approve.)

8. ACTION CALENDAR

8.1 Adopt Resolution No. PRWA 2015-001, a Resolution of the Board of Directors of the Palmdale Recycled Water Authority authorizing the adoption of the Palmdale Recycled Water Authority 2015 Budget. (Staff Reference: Assistant Executive Director Mischel)

Call for Public Comments

Staff Recommendation: Move to adopt Resolution No. PRWA 2015-001. (**Vote by Roll Call** – requires a majority to approve, and per Section 4.9(e) of the Authority's Joint Exercise of Powers Agreement, the affirmative vote of at least one director from each member agency).

8.2 Adopt Resolution No. PRWA 2015-002, a Resolution of the Board of Directors Of the Palmdale Recycled Water Authority authorizing the Adoption of the Mitigated Negative Declaration for Recycled Water Facilities Master Plan Initial Study. (Staff Reference: Executive Director LaMoreaux)

Call for Public Comments

Staff Recommendation: Move to adopt Resolution No. PRWA 2015-002. (**Vote by Roll Call** – requires a majority to adopt, and per Section 4.9(e) of the Authority's Joint Exercise of Powers Agreement, the affirmative vote of at least one director from each member agency).

9. NON-AGENDA ITEMS - PUBLIC COMMENTS: This portion of the Agenda allows an individual the opportunity to address the Board of Directors on any subject regarding Palmdale Recycled Water Authority business. Under state legislation, no action can be taken on items not specifically referenced on the Agenda. **PLEASE NOTE: A three-minute time limit** will be imposed on each speaker other than staff members.

10. CLOSED SESSION – PUBLIC COMMENTS ONLY: If you wish to comment on any Closed Session item on this agenda, please come forward to the podium and state the item number(s) and your comments. **PLEASE NOTE: A three-minute time limit** will be imposed on each speaker other than staff members.

11. CLOSED SESSION – CONFERENCE WITH LEGAL COUNSEL - ANTICIPATED LITIGATION: A closed session will be held, pursuant to Government Code §54956.9 (d)(4) because the Authority is considering whether to initiate litigation in one case.

12. INFORMATIONAL REPORT OF THE BOARD OF DIRECTORS, EXECUTIVE DIRECTOR, AND ASSISTANT EXECUTIVE DIRECTOR.

13. ADJOURNMENT to February 18, 2015 at 7:00 p.m. at the City of Palmdale Council Chambers located at 38300 Sierra Highway, Suite B, Palmdale, California.

Complete packets can be viewed at City Hall, located at 38300 Sierra Highway, Suite A, Palmdale, California; the Palmdale Water District, 2029 East Avenue Q, Palmdale, California, and the Main Library, located at 700 East Palmdale Boulevard, Palmdale, California. You can also view the Agenda for the Palmdale Recycled Water Authority on the City's website at www.cityofpalmdale.org or the Palmdale Water District website at www.palmdalewater.org.

Thank you for attending your Palmdale Recycled Water Authority meeting. If you have any further questions, please contact the Secretary's Office at (661) 267-5151, Monday through Thursday, 7:30 a.m. to 6:00 p.m., closed every Friday.

PALMDALE RECYCLED WATER AUTHORITY

BOARD MEMORANDUM

DATE:	January 21, 2015	**January 21, 2015**
TO:	BOARD OF DIRECTORS	**Board Meeting**
FROM:	Board Secretary Rebecca Smith	
VIA:	Mr. Dennis LaMoreaux, Executive Director, PRWA	

RE: AGENDA ITEM NO. :.2 – TREASURER'S REPORT FOR DECEMBER 31, 2014

Recommendation:

Palmdale Recycled Water Authority (PRWA) staff recommends the Board of Directors to receive and file the Treasurer's Report for the eleven months ending December 31, 2014.

Background:

To comply with provisions required by Section 4.13 of the Joint Powers of Authority Agreement and responsibilities of Treasurer, a Financial Report is prepared and submitted to the Board of Directors who certifies the availability of funds for the reports presented. These reports are hereby submitted to the Board of Directors for ratification.

Financial Impact:

As of December 31, 2014, the PRWA has $64,582.49 cash in the bank and $215,248.20 in Accounts Receivable due from the Palmdale Water District and the City of Palmdale for their 2014 contributions and water reimbursements. During 2014, the PRWA earned $130.39 in interest and paid invoices totaling $66,388.99 in expenditures and has $5,624.85 in unpaid invoices due.

Supporting Documents:

December 31, 2014 Treasurer's Report.

Palmdale Recycled Water Authority
Treasurer's Report
Month Ended December 31, 2014

Cash/Funds Available and held at Bank of America:		
Audited Balance, beginning		$181,184.12
Less: 2013 Accounts Payable		($50,343.03)
Available Balance, beginning		130,841.09
Deposits:	Interest Earnings	130.39
Expenditures		66,388.99
Balance, ending		$64,582.49

Expenditures:

Wateruse Association, 2014 Membership Dues	2,552.37
Rackspace, Hosting Service (Monitoring & Firewall to Oct 2014)	7,301.57
Carollo Engineers to Sept 2014	45,510.74
County Sanitation District (Jan-Sept)	3,524.31
Vavrinek, Trine, Day & Co., LLP (2013 Audit)	7,500.00
Total Expenditures	66,388.99

Accounts Payable:

County Sanitation District (Oct-Dec)	5,624.85
Total Accounts Payable	5,624.85

Accounts Receivable:

City of Palmdale - 2014 Contribution	100,000.00
Palmdale Water District - 2014 Contribution	100,000.00
City of Palmdale - Water	15,248.20
Total Account Receivable	215,248.20

PALMDALE RECYCLED WATER AUTHORITY

BOARD MEMORANDUM

DATE:	January 14, 2015	**January 21, 2015**
TO:	BOARD OF DIRECTORS	**Board Meeting**
FROM:	Mr. Michael J. Mischel, Assistant Executive Director, PRWA	
VIA:	Mr. Dennis LaMoreaux, Executive Director, PRWA	

RE: AGENDA ITEM NO. 8.1 – CONSIDERATION AND POSSIBLE ACTION ON RESOLUTION NO. PRWA 2015-001 AUTHORIZING THE ADOPTION OF THE PALMDALE RECYCLED WATER AUTHORITY 2015 BUDGET

Recommendation:

Palmdale Recycled Water Authority (PRWA) staff recommends approving the proposed 2015 budget as presented in the 2015 Budget Document and approval of Resolution No. PRWA 2015-001 authorizing the adoption of the Palmdale Recycled Water Authority 2015 Budget.

Background:

A part of the Palmdale Recycled Water Authority's duties is to create an annual operating budget. The proposed 2015 Budget highlights revenue from water sales, member contributions, and anticipated projects. The budget also outlines expenditures such as consultant services, training, and recycled water purchases.

Due to the possibility of anticipated grant opportunities, staff recommends setting aside the unappropriated funds for design of the second phase of the recycled water system. The remaining balance of funds will also offset any unexpected repairs on either the pump station or the mainline.

Financial Impact:

As set forth in the budget document, the fiscal year 2015 budgeted unappropriated reserves are $279,758. The Authority's policy is to have unappropriated reserves for emergencies.

Transfers from the member agencies of $100,000 each will provide for reserves for the Authority for emergencies and design fees for the next phase of the Authority's system. As set forth in the attached budget document, the 2015 budget indicates proposed 2014 carryover of $279,758, 2014 water sales revenue of $15,248, $200,000 in contributions, and expenditures of $453,000, results in a projected budget balance of $46,758.

Supporting Documents:

Resolution No. PRWA 2015-001

RESOLUTION NO. PRWA 2015-001

A RESOLUTION OF THE BOARD OF DIRECTORS OF THE PALMDALE RECYCLED WATER AUTHORITY AUTHORIZING THE ADOPTION OF THE PALMDALE RECYCLED WATER AUTHORITY 2015 BUDGET

WHEREAS, The Palmdale Recycled Water Authority has identified the need for a 2015 Budget, and

WHEREAS, The Palmdale Recycled Water Authority Board reviewed the proposed Budget for fiscal year 2015, and

WHEREAS, the Palmdale Recycled Water Authority considered the proposed budget as submitted and made all changes and amendments thereto which said Authority, desired to make therein; and

WHEREAS, individual project costs have been proportionately budgeted to the respective project areas based upon the benefit attributable to the targeted project area including improving inadequate public improvements and public facilities, improving and correcting depreciated values; and,

WHEREAS, the Palmdale Recycled Water Authority has approved a fund reserve for emergency situations such as natural disasters; and,

WHEREAS, the Palmdale Recycled Water Authority has heretofore, or hereafter will, raise sufficient revenues to finance and balance said budget.

PROPOSED

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the Palmdale Recycled Water Authority:

SECTION 1: The original of the Budget of the Palmdale Recycled Water Authority shall be placed on file in the office of the Authority Clerk and shall be open to public inspection.

SECTION 2: The Palmdale Recycled Water Authority hereby approves all of the adjustments to the fiscal year 2015 revenues and expenditures as presented in the fiscal year 2015 budget document.

SECTION 3: The Budget of the Palmdale Recycled Water Authority is hereby approved and adopted. In adopting said budget the Authority Board approved the specified amounts for each of the various programs and accounts set forth.

SECTION 4: The Authority Treasurer is hereby authorized and instructed to take all steps necessary to implement this resolution in accordance with the provisions of the budget document.

SECTION 5: Without prior approval of the Authority Board, the Executive Director shall have authority to transfer up to $25,000 from program to program, except for shifts in appropriations relating to personnel. Any transfer of more than such amount shall be approved by the Authority Board.

SECTION 6: The Authority Treasurer, with the approval of the Executive Director shall approve the Encumbrances and Continuing Appropriations from the Authority's budget for fiscal year 2015.

SECTION 7: The Budget for fiscal year 2015, as submitted, amended, modified, revised, corrected, adopted, and filed by the Authority shall be the fiscal year 2015 Budget for the Palmdale Recycled Water Authority. The Budget is subject to the requirements of Article XIII B of the California Constitution.

SECTION 8: The Clerk of the Authority shall certify to the adoption of this Resolution and enter it into the official records of the Authority.

PASSED, APPROVED and ADOPTED this 21st day of January, 2015, by the following vote:

AYES:_____

NOES:_____

ABSTAIN:_____ ABSENT:_____

PROPOSED

_____
James C. Ledford, Jr., Chair

ATTEST:

_____
Rebecca Smith,
Authority Secretary

Approved as to form:

Wm. Matthew Ditzhazy,
Authority Counsel

Palmdale Recycled Water Authority

Proposed Budget

Palmdale Recycled Water Authority

Date Modified 01/14/2015

Org	Object		2013 Budget	2013 Actual	2014 Proposed	2014 Actual	2015 Proposed
		Revenues:					
		Carryover			$ 136,395	$ 136,395	$ 279,758
7151595	499400	Palmdale Water District Contributions	$ 100,000	$ 100,000	$ 100,000	$ 100,000	$ 100,000
7151595	499401	City of Palmdale Contributions	$ 100,000	$ 100,000	$ 100,000	$ 100,000	$ 100,000
7151595	451110	Interest Earnings	$ -	$ 20	$ -	$ 130	$ -
7151595	499402	Water Sales	$ 17,000	$ -	$ 15,500	$ 15,248	$ 20,000
7151595	499403	Meter Fees	$ 3,000	$ -	$ -	$ -	$ -
7151595	499404	Grants	$ 60,000	$ -	$ -	$ -	$ -
		Total Revenue	$ 280,000	$ 200,020	$ 351,895	$ 351,774	$ 499,758
		Expenditures:					
7151595	721410	Cont Svcs - Audit	$ -	$ -	$ 8,500	$ 7,500	$ 8,500
7151595	711000	Insurance	$ 5,000	$ -	$ 3,000	$ -	$ 3,000
7151595	735100	Office Supplies	$ 1,000	$ -	$ 500	$ -	$ 500
7151595	710000	Training	$ 10,000	$ -	$ 5,000	$ -	$ 5,000
7151595	725200	Memberships	$ 6,000	$ 2,552	$ 5,000	$ 2,552	$ 5,000
7151595	722345	Outreach	$ 1,000	$ 1,496	$ 6,000	$ 7,302	$ 6,000
7151595	721911	Cont Svcs - Consultant Svcs	$ -	$ -	$ -	$ -	$ 400,000
7151595	721960	Recycled Water System Master Plan	$ 140,000	$ 44,130	$ 75,268	$ 45,512	$ -
7151595	721960	Recycled Water Rate Study	$ -	$ -	$ -	$ -	$ -
7151595	729100	Water Purchases - LACSD	$ 15,000	$ 15,248	$ 25,000	$ 9,149	$ 25,000
7151595	731700	Electricity - Booster Station LACSD	$ 8,000	$ 198	$ -	$ -	$ -
		Total Expenditures	$ 186,000	$ 63,624	$ 128,268	$ 72,015	$ 453,000
		Net Income (Loss)	$ 94,000	$ 136,395	$ 223,627	$ 279,758	$ 46,758

PALMDALE RECYCLED WATER AUTHORITY

BOARD MEMORANDUM

DATE: January 14, 2015 **January 21, 2015**
TO: BOARD OF DIRECTORS **Board Meeting**
FROM: Mr. Michael J. Mischel, Assistant Executive Director, PRWA
VIA: Mr. Dennis LaMoreaux, Executive Director, PRWA

RE: AGENDA ITEM NO. 8.2 – CONSIDERATION AND POSSIBLE ACTION ON RESOLUTION NO. PRWA 2015-002 AUTHORIZING THE ADOPTION OF THE MITIGATED NEGATIVE DECLARATION FOR THE RECYCLED WATER FACILITIES MASTER PLAN INITIAL STUDY

Recommendation:

Staff recommends adopting attached Resolution No. PRWA 2015-002 – "Mitigated Negative Declaration ("MND") for the Recycled Water Facilities Master Plan Initial Study.

Background:

October 30, 2014 through December 1, 2014 – The Authority circulated and published (Antelope Valley Press) the Notice of Intent to Adopt a Mitigated Negative Declaration as required by CEQA.

January 2015 – The Authority prepared responses to comments, Mitigation Monitoring and Reporting Program, and Findings related to the Project.

Financial Impact:

The adoption of the attached MND will have no impact on the budget

Supporting Documents:

Resolution No. PRWA 2015-002

RESOLUTION NO. PRWA 2015-002

A RESOLUTION OF THE BOARD OF DIRECTORS OF THE PALMDALE RECYCLED WATER AUTHORITY AUTHORIZING THE ADOPTION OF THE MITIGATED NEGATIVE DECLARATION FOR RECYCLED WATER FACILITIES MASTER PLAN INITIAL STUDY

WHEREAS, the Palmdale Recycled Water Authority ("Authority") has determined it is in the best interests of its constituents to conduct a Recycled Water Facilities Master Plan (the "Project");

WHEREAS, pursuant to the requirements of the California Environmental Quality Act ("CEQA") the Authority prepared an Initial Study for the Project;

WHEREAS, based upon the Initial Study, the Authority found that the Project would not result in significant environmental effects because mitigation measures or revisions to the Project have been made or agreed to by the Authority as the Project's proponent, and that the Project qualified for a Mitigated Negative Declaration ("MND");

WHEREAS, the MND was published pursuant to CEQA in October 2014, notice of the Authority's intent to adopt the MND was published in a local newspaper, and the District provided a copy of the MND to the State of California State Clearinghouse for review by pertinent state agencies and circulated for a 30-day review October 30, 2014 to December 1, 2014; and

PROPOSED

WHEREAS, the Authority received a number of comments after publishing the MND, and has incorporated into the proposed Project appropriate measures in response to those comments, or otherwise considered those comments.

NOW THEREFORE, THE BOARD OF DIRECTORS OF THE PALMDALE RECYCLED WATER AUTHORITY DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. The Board of Directors of Palmdale Recycled Water Authority has reviewed and finds the Mitigated Negative Declaration for the Recycled Water Facilities Master Plan Initial Study as adequate and complete in that it addresses all potential environmental effects of the proposed Project, fully complies with CEQA, and reflects the Board of Directors' independent judgment and analysis.

SECTION 2. The Authority's Board of Directors hereby adopts the "Review of comments made on the Mitigated Negative Declaration (State Clearinghouse No. 200871130) for the Recycled Water Facilities Master Plan Initial Study," which are attached hereto as Exhibit A and incorporated herein by this reference. Such Findings include the Finding of no significant adverse effect as determined in the Mitigated Negative Declaration and that all potential significant environmental effects have been reduced to an acceptable level in that such potential significant environment effects identified in the Mitigated Negative Declaration have been eliminated, or reduced to a level of insignificance, by mitigation measures identified in the Mitigated Negative Declaration and made part of the Project.

SECTION 3. The Authority's Board of Directors hereby adopts the Mitigation Monitoring and Reporting Program for the Project, included herein as Exhibit B.

SECTION 4. The Authority's Board of Directors hereby approves the Mitigated Negative Declaration for the Recycled Water Facilities Master Plan Initial Study

SECTION 5. Authority's staff is hereby directed to file a Notice of Determination with the State Office of Planning and Research and the Los Angeles County Clerk pursuant to the provisions of Section 15975(a) of the CEQA Guidelines.

SECTION 6: The Clerk of the Authority shall certify to the adoption of this Resolution and enter it into the official records of the Authority.

PASSED, APPROVED and ADOPTED this 21st day of January, 2015, by the following vote:

AYES:_____

NOES:_____

ABTAIN:_____ ABSENT:_____

PROPOSED

_____
James C. Ledford, Jr., Chair

ATTEST:

_____
Rebecca Smith,
Authority Secretary

Approved as to form:

_____
Wm. Matthew Ditzhazy,
Authority Counsel

10. Comment Letters

This IS/MND for the proposed project was circulated for public review for 30 days (October 30, 2014 through December 1, 2014). PRWA received five (5) comment letters during the public review period. The letters are presented in the order listed in the **Table 13** below, based on date received by PRWA. The letters have been bracketed to provide a numbering system for each comment in each letter. Responses to each numbered comment are provided subsequently in Section 11 of this IS/MND.

TABLE 13
COMMENT LETTERS RECEIVED

Letter No.	Commenting Agency	Date of Comment
1	Antelope Valley Air Quality Management District (AQMD)	November 14, 2014
2	Los Angeles County Department of Public Health	November 21, 2014
3	California Department of Transportation (Caltrans)	November 24, 2014
4	Lahontan Regional Water Quality Control Board	December 2, 2014
5	California Department of Fish and Wildlife	December 4, 2014

10.1 Response to Comments Related to Groundwater Recharge

Several comments requested additional information about the potential future groundwater recharge project in Littlerock Creek that may be served by Phase 5 of the Recycled Water Facilities Plan. As stated in the responses to comments presented below, PWD is currently evaluating the feasibility of such a recharge project. The Recycled Water Facilities Plan evaluated in this IS/MND does not include the groundwater recharge project in Littlerock Creek. As stated on page 11 of this IS/MND: *"Any future implementation of groundwater recharge in Littlerock Creek would be subject to evaluation pursuant to CEQA, including public circulation of a future CEQA document that provides details of the groundwater project design and operation and assesses the location-specific environmental impacts."* PWD would be the lead agency for any such CEQA documentation.

The proposed project is a Recycled Water Facilities Plan that includes infrastructure (i.e., pipelines and a pump station) to deliver recycled water to end uses and end users in accordance with reasonably-foreseeable planned future projects. The goal of the Facilities Plan is to allow for the reuse of recycled water to offset potable demand and diversify the region's water supply options. As such, the Facilities Plan includes infrastructure sized to support the expected end uses for recycled water, including irrigation, commercial or industrial cooling systems, and potentially groundwater recharge. The impacts of installing and operating this infrastructure are disclosed in this IS/MND.

However, in response to the comments, Phase 5 of the Recycled Water Facilities Plan has been removed from the proposed project evaluated in this IS/MND. PRWA will not certify that the Final IS/MND as currently compiled is sufficient to approve Phase 5. PRWA will certify that the remaining phases of the Facilities Plan – Phase 1 (already built), Phase 2, Phase 3, Phase 4, and Phase 6 – are evaluated in this Final IS/MND at a sufficient level of detail to allow for project approval and implementation.

Comment Letter 1 - AQMD

Antelope Valley Air Quality Management District
43301 Division St., Suite 206
Lancaster, CA 93535-4649

661.723.8070
Fax 661.723.3450

Eldon Heaston, Executive Director

In reply, please refer to AV1114/096

RECEIVED
NOV 18 2014
By

November 14, 2014

Matthew Knudson
Palmdale Recycled Water Authority
2029 East Avenue O
Palmdale, CA 93550

Project: Proposed Mitigated Negative Declaration for the Palmdale Recycled Water Authority Recycled Water Facilities Plan.

Dear Mr. Knudson:

The Antelope Valley Air Quality Management District (District) has received the Proposed Mitigated Negative Declaration for the Palmdale Recycled Water Authority (PRWA) Recycled Water Facilities Plan. The proposed project includes construction and operation of distribution pipelines, laterals and pumping facilities to provide approximately 1,325 AFY of tertiary-treated recycled water to PRWA customers, primarily for landscape irrigation at parks, schools, and golf courses. In addition, the proposed project could potentially provide up to 9,450 AFY of recycled water for groundwater recharge in Littlerock Creek.

The District has reviewed the document and concurs with the proposed analysis of the air quality impacts associated with the intended project. The District also appreciates the focus on fugitive dust issues and that the proposed project must comply with the all requirements outlined in District Rule 403, *Fugitive Dust,* including submittal of a Dust Control Plan prior to initiating construction. AQMD-1

Thank you for the opportunity to review this planning document. If you have any questions regarding the information presented in this letter please contact me at (661) 723-8070 ext. 2 or bbanks@avaqmd.ca.gov .

Sincerely,

Bret Banks
Operations Manager

Comment Letter 2 - LAPH

FW Notice of Intent to Adopt a MNDPRWA Recycled Water Facilities Plan- LACODPH Comments
From: Michelle Tsiebos [mailto:mtsiebos@ph.lacounty.gov]
Sent: Friday, November 21, 2014 3:53 PM
To: Matthew Knudson
Subject: Notice of Intent to Adopt a MND/PRWA Recycled Water Facilities Plan- LACODPH Comments

Hi Matthew,

Thank you for the opportunity to comment on your city's project. Please include the Cross Connection & Water Protection Control Program of the Los Angeles County Department of Public Health on the list of permitting agencies for the project. The Program can be reached at (626) 430-5290. The contact for Palmdale is inspector Glenn Van Eekhout (661-287-7020). LAPH-1

Thank you.

Michelle Tsiebos, REHS, DPA
Environmental Health Specialist IV
Land Use Program
Environmental Health Services
Department of Public Health
5050 Commerce Drive
Baldwin Park, CA 91706
Ph. (626) 430-5382
Fax. (626) 813-3016

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Comment Letter 3 - Caltrans

STATE OF CALIFORNIA - CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
www.dot.ca.gov

Serious drought. Help save water!

November 24, 2014

Mr. Matthew Knudson
Palmdale Recycled Water Authority
2029 East Avenue Q
Palmdale, CA 93550

RE: Recycled Water Facilities
Mitigated Negative Declaration
SCH#2014101064, IGR#141111FL
Vic. LA/ SR-138/ PM49.5

Dear Mr. Knudson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project is proposing to include construction and operation of distribution pipelines and laterals and pumping facilities. Also, the proposed project would potentially provide up to 9,450 acre-feet per year (AFY) of recycled water for groundwater recharge in Little Rock Creek.

Caltrans acknowledge Mitigation Measures TRA-1 that a Traffic Control Plan will be prepared and implemented. We would like to remind you that oversize-transport vehicles on State highways will require a Caltrans transportation permit, and any work to be performed within the State Right-of-way will need an Encroachment Permit. We recommend that large size truck trips be limited to off-peak commute periods, such as similar to what's listed in Page 101 of your report to consider as scheduling truck trips outside of peak morning and evening commute hours. Caltrans-1

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects need to be designed to discharge clean run-off water. Additionally storm water run-off is not permitted to discharge onto State highway facilities. Caltrans-2

If you have any questions or concerns regarding these comments, please feel free to contact me at (213) 897 – 9140 or project coordinator Frances Lee at (213) 897-0673 or electronically at frances.lee@dot.ca.gov.

Sincerely,

Dianna Watson

DIANNA WATSON
Branch Chief, Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Comment Letter 4 - RWQCB

Water Boards

Lahontan Regional Water Quality Control Board

December 2, 2014

File: Environmental Doc Review
Los Angeles County

Matthew Knudson
Palmdale Recycled Water Authority
2020 East Avenue Q
Palmdale, CA 93550
mknudson@palmdalewater.org

COMMENTS ON THE NOTICE OF COMPLETION OF AN INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION FOR THE PALMDALE RECYCLED WATER AUTHORITY RECYCLED WATER FACILITIES PLAN PROJECT, LOS ANGELES COUNTY, STATE CLEARINGHOUSE NO. 2014101064

The California Regional Water Quality Control Board, Lahontan Region (Water Board) staff received the Notice of Completion of an Initial Study and Mitigated Negative Declaration (IS/MND) for the above-referenced project (Project) on November 3, 2014. The IS/MND was prepared by the Palmdale Recycle Water Authority (PRWA) and submitted in compliance with provisions of the California Environmental Quality Act (CEQA). The PRWA's members include the City of Palmdale and Palmdale Water District. Water Board staff, acting as a responsible agency, is providing these comments to specify the scope and content of the environmental information relating to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations, title 14, section 15096. Based on our review of the proposed Project, we recommend the following: 1) that PRWA establish background water quality for the native groundwater beneath the site prior to implementation of the recharge project, 2) that PRWA begin discussions with the State Water Board Division of Drinking Water (DDW) during the evaluation phase of the recharge project to meet public health requirements, and 3) a combination of sediment and erosion control best management practices (BMPs) be implemented to effectively treat post-construction storm water runoff and other clear-water discharges during the life of the Project. RWQCB-1

PROJECT DESCRIPTION

The Project is to implement PRWA's 2014 Recycled Water Facilities Plan, which includes construction and operation of distribution pipelines, laterals, and a pump station to serve a 46 square mile service area. The project consists of 6 phases. Phase 1 has already been completed, which is a pipeline from the Palmdale Water Reclamation Plant (PWRP) south on 30th St to Ave R. With the exception of Phase 5, the distribution pipelines and laterals will be installed in existing paved road right-of-way. According to IS/MND Figure 2, the pipelines are essentially located in developed areas. Phase 5 is a Pipeline that extends along Ave R east to Little Rock Creek for groundwater recharge. Phase 5 would potentially provide up to 9,450 acre-feet per year or, 8.43 million gallons per day (mgd) of recycled water for groundwater recharge (groundwater replenishment) in Little Rock Creek. Palmdale Water District is evaluating the feasibility of Phase 5. Los Angeles County Sanitation Districts (LACSD), RWQCB-2

Regional Water Quality Control Board | Patty Z. Kouyoumdjian, Executive Officer
14440 Civic Drive, Suite 200, Victorville, CA 92392 | www.waterboards.ca.gov/lahontan

Recycled Paper

Comment Letter 4 - RWQCB

District 20, produces from 9 to 10 mgd of recycled water from the PWRP. Because Phase 5 will potentially provide up to 8.43 mgd of recharged water, the project will utilize most of the recycled water produced at the PWRP. RWQCB-2

WATER BOARD'S AUTHORITY

All groundwater and surface waters are considered waters of the State. Surface waters include streams, lakes, ponds, and wetlands, and may be ephemeral, intermittent, or perennial. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the State are also waters of the U.S. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the U.S. The Water Quality Control Plan for the Lahontan Region (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Basin Plan sets forth water quality standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml RWQCB-3

SPECIFIC COMMENTS

Our comments on the Project are outlined below.

1. We recognize the need to recharge groundwater supplies to meet demand, and disinfected tertiary recycled water that meets Title 22 requirements for groundwater replenishment is a viable source to recharge aquifers that drain from Little Rock Creek. However, the dissolved solids and total nitrogen quality of Palmdale disinfected tertiary recycled water is generally of lesser quality than native groundwater in the Antelope Valley. In order to evaluate the Project's potential effect on the quality of native groundwater over time, we recommend that PRWA establish the background quality of the groundwater beneath the site prior to implementing recharge activities. Additionally, an Anti-degradation analysis should be completed to satisfy State Board Resolution No. 68-16 "Statement of Policy with Respect to Maintaining High Quality of Waters in California". At minimum, several quarters of data that would profile any changes due to seasonality would be needed to establish a statistically valid data set. The Groundwater Monitoring Plan, which will be prepared and implemented as part of the Project, should include provisions for establishing background water quality for groundwater. RWQCB-4
2. The IS/MND did not discuss the need to perform hydrostatic testing of the new distribution pipelines and laterals. This activity has the potential to generate significant quantities of wastewater and may require separate permits (see Permitting Requirements below). We request PRWA to consider capturing these waste streams for reuse as dust control over the Project site. Should land disposal of these clear-water discharges be necessary, such discharge should be done in a manner that maximizes infiltration and does not concentrate flows or result in erosion. An appropriate combination of sediment and erosion control BMPs must be implemented for all clear-water discharges. RWQCB-5
3. Post-construction storm water management must be considered a significant Project component, and BMPs that effectively treat post-construction storm water runoff should be included as part of the Project. We request that vegetation clearing be kept to a RWQCB-6

Comment Letter 4 - RWQCB

minimum and, where feasible, existing vegetation be mowed so that vegetation could more readily reestablish post-construction. The temporary BMPs need to be implemented for the Project until such time that vegetation has been restored to pre-Project conditions. RWQCB-6

4. Disinfected tertiary recycled water from the Palmdale plant is chlorinated. The discharge of chlorinated water to waters of the State through groundwater recharge would be a violation of the Basin Plan. The plant will need to switch to UV disinfection or PRWA will need to develop another method that does not result in trihalomethanes or haloacetic acids in the recycled water. RWQCB-7

5. Water Board staff requests that PRWA evaluate the public health impacts (i.e. waterborne illnesses) for the Phase 5 groundwater recharge project. RWQCB-8

6. Obtaining a permit and conducting monitoring does not constitute adequate mitigation. Development and implementation of acceptable mitigation is required. The IS/MND must specifically describe the BMPs and other measures used to mitigate Project impacts. RWQCB-9

PERMITTING REQUIREMENTS

A number of activities associated with the proposed Project appear to have the potential to impact waters of the State and, therefore, may require permits issued by either the State Water Resources Control Board (State Water Board) or Lahontan Water Board. The required permits may include:

7. Clear-water discharges, including hydrostatic pipeline and tank testing discharges, to the onsite ephemeral drainages may be subject to discharge and monitoring requirements under the National Pollutant Discharge Elimination System (NPDES) General Permit, Limited Threat Discharges to Surface Waters, Board Order R6T-2008-0023 or to discharge requirements under the Statewide General Waste Discharge Requirements (WDRs) For Discharges to Land With A Low Threat To Water Quality, Water Quality Order No. 2003-0003-DWQ, both issued by the Lahontan Water Board. RWQCB-10

8. Streambed alteration and/or discharge of fill material to a surface water may require a CWA, section 401 water quality certification for impacts to federal waters (waters of the U.S.), or dredge and fill waste discharge requirements for impacts to non-federal waters, both issued by the Lahontan Water Board, particularly Phase 5 which may involve crossings of Little Rock Creek drainages. RWQCB-11

9. Land disturbance of more than 1 acre may require a CWA, section 402(p) storm water permit, including a NPDES General Construction Storm Water Permit, Water Quality Order (WQO) 2009-0009-DWQ, obtained from the State Water Board, or an individual storm water permit obtained from the Lahontan Water Board. RWQCB-12

10. A Project that uses recycled water for groundwater replenishment requires a waste discharge requirements/water recycling requirements permit from the Lahontan Water Board. This is because the existing master recycled water permit issued to LACSD District 20 does not include groundwater replenishment as an authorized use. As part of the permit application process, PWRP must prepare an engineering report for the recharge project and submit the report to the State Water Board DDW. The Project must meet the prescriptive and performance requirements for groundwater RWQCB-13

Comment Letter 4 - RWQCB

replenishment regulations, which became effective on June 18, 2014. Water Board staff recommends technical discussions with DDW during Phase 5 feasibility evaluation. RWQCB-13

Please be advised of the permits that may be required for the proposed Project, as outlined above. Should Project implementation result in activities that will trigger these permitting actions, the Project proponent must consult with Water Board staff well in advance of Project construction. Information regarding these permits, including application forms, can be downloaded from our web site at http://www.waterboards.ca.gov/lahontan/ RWQCB-14

Thank you for the opportunity to comment on the IS/MND. If you have any questions regarding this letter, please contact me at (760) 241-7353 (mike.coony@waterboards.ca.gov) or Jehiel Cass P.E., Senior Engineer, at (760) 241-2434 (jehiel.cass@waterboards.ca.gov).

for Jehiel W. Cass, P.E.

Mike Coony, P.E.
Water Resources Control Engineer

cc via email: State Clearinghouse (SCH 2014101064), (state.clearinghouse@opr.ca.gov)
CA Dept of Fish and Wildlife, South Coast Region, (AskR5@wildlife.ca.gov)

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Comment Letter 5 - CDFW

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

December 4, 2014

Mr. Matthew Knudson, Asst. General Manager
Palmdale Recycled Water Authority
2029 East Ave. Q
Palmdale, CA 93550
Mknudson@palmdalewater.org

Subject: Comments on the Draft Initial Study and Mitigated Negative Declaration for the Palmdale Recycled Water Authority Recycled Water Facilities Plan Project, Los Angeles County (SCH# 2014101064).

Dear Mr. Knudson:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Initial Study and Mitigated Negative Declaration (MND) prepared by the Palmdale Recycled Water Authority (PRWA) for the Recycled Water Facilities Plan (Project). The Project area includes 46 square miles in portions of the City of Palmdale and unincorporated Los Angeles County. The Project, as approved, would include the installation of a pipeline network to deliver recycled water to PRWA customers for landscape irrigation, as well as a proposed pipeline that will deliver recycled water to a future groundwater recharge basin in Littlerock Wash. On November 26, 2014 the Department requested an extension to December 4, 2014, which was granted, we appreciate the extension.

The following comments and recommendations have been prepared pursuant to the Department's authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*, and pursuant to our authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) to assist the Lead Agency in avoiding or minimizing potential project impacts on biological resources

Adequacy of CEQA Review

1) Project Description. The Project Description indicates a pipeline will be built that extends east past Avenue 65 and into Little Rock Wash. The MND also indicates this pipeline will terminate into a basin that will be built in Little Rock Wash at a future date, but the impacts of the basin will be disclosed and analyzed in a separate CEQA project by PWRA. The Department recommends the Project Description in the MND provide more detail regarding Phase 6 of the Project and its relationship to the subsequent basin in Little Rock Wash. CDFW-1

   a) The Department is concerned that separating the anticipated basin project in Little Rock Wash from the proposed pipeline Project prohibits the Department from accurately analyzing the environmental effects of the proposed Project. Although the proposed CDFW-2

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basin would be analyzed and approved by a separate entity, the PRWA should include an analysis of this reasonable and foreseeable anticipated impact of the connected action in the MND (CEQA Guidelines § 15070(a)). The Department recommends PRWA disclose, in a manner that accurately reflects the whole of the action, an assessment of all direct and indirect biological impacts to the environment that could occur with the implementation of the Project including the basin (CEQA Guidelines § 15070). CDFW-2

b) The Department recommends the PRWA look at alternative locations for the placement of the pipeline and basin that would reduce impacts to this biologically sensitive area. Because CEQA places emphasis on avoiding and reducing environmental impacts, the Department recommends utilizing alternative Project locations that avoid impacts to Little Rock Wash as well as Joshua tree woodland habitat. Absent enforceable mitigation measures with associated performance standards, the Department cannot support the conclusions of the MND that impacts to Little Rock Wash will be mitigated to below a significant level. CDFW-3

c) The MND identifies the potential for sensitive species to occur within the Project footprint. Mitigation measures include preconstruction surveys and relocation to bring impacts below the significance threshold. Specific surveys were not conducted to disclose whether these resources would be impacted or whether any alternative Project design would avoid or minimize these impacts. The MND should include a complete analysis of the baseline conditions for the Project site. Absent a baseline assessment and enforceable mitigation measures with associated performance standards, the Department is unable to support the conclusions of the MND that impacts to sensitive species would be mitigated to below a significant level. CDFW-4

To enable the Department to review and comment on how the proposed Project would avoid or minimize environmental impacts where feasible, [CEQA Guidelines § 15021 and §15070(b)(1)] the Department requests specific information regarding impacts to Little Rock Wash including: 1) survey results conducted during the appropriate time of year for plants, fish, and wildlife that clearly identify what species are present and will be impacted, 2) the regional significance of this impact to the species' population (locally and regionally), and 3) alternative pipeline and basin locations that avoid impacts to Little Rock Wash. CDFW-5

Adequacy of Biological Analysis

2) Rare, Threatened and Endangered Plants. The MND indicates "surveys for Rare, Threatened and Endangered plants were not conducted". The MND also includes BIO-7 as a mitigation measure. BIO-7 indicates a pre-construction rare plant survey will be done, and if rare plants are found, they will be salvaged and moved in consultation with the Department [see comment 1(b)].

a) If impacts to sensitive species cannot be avoided, the Department recommends conserving land with existing, high conservation value populations of the subject species already occurring, and preserving this habitat in perpetuity with a conservation agency. CDFW-6

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b) The Department also considers impacts to Sensitive Plant Communities significant. These communities are considered to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3 and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2008). The Department recommends PRWA conduct focused surveys for Rare, Threatened, and Endangered plants and disclose the findings in the final MND.

CDFW-7

3) California Endangered Species Act (CESA). The Department considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085). Consequently, if the project, project construction, or any project-related activity during the life of the project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from the Department may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

CDFW-8

4) Mohave Ground Squirrel. The MND states the potential for the CESA-listed Mohave ground squirrel (MGS) (*Xerospermophilus mohavensis*) to be present on the Project site. Mitigation measures include conducting pre-construction presence/absence surveys and, if found, conservation of mitigation land or an in-lieu fee to bring Project-related impacts to below the significance threshold.

The Department recommends surveys be conducted for MGS, and the results disclosed in the CEQA document [see comment 1(c)] to allow the Department to fully evaluate impacts to the species and the effectiveness of any proposed mitigation. Factors such as the number of individuals, family grouping, amount of suitable habitat available in the immediate area, the range and distribution of MGS in this area, and the cumulative loss of MGS habitat from this area, are important factors in determining if the proposed mitigation is adequate.

An ITP would be needed to allow lawful incidental take of MGS. To avoid construction delay should MGS be detected prior to or during construction, the Department recommends the PRWA obtain an ITP for MGS.

CDFW-9

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5) Townsend's big-eared bat. The MND states Townsend's big-eared bat (*Corynorhinus townsendii*) is a Species of Special Concern (SSC). The MND should be corrected to accurately reflect Townsend big-eared bat as a candidate species under CESA. CDFW-10

6) Joshua Tree Woodland. The MND indicates that Joshua tree woodland, a State and regionally significant sensitive plant community, will be impacted. The MND proposes BIO-10, obtaining a desert vegetation tree removal permit, which specifies two Joshua trees per acre be preserved, and BIO-11, the future undertaking of a biota report for Phase 5 of this Project as mitigation for Project impacts. CDFW-11

   a) The Department recommends the MND disclose impacts to Joshua tree woodlands in individual trees and acres (see comment 1). CEQA Sections 15070 and 15071 require a project MND to avoid potentially significant effects or mitigate potentially significant effects to a point where clearly no significant effects would occur. The deferral of biological analysis to a future date removes the ability of these impacts to be quantified and disclosed, and specific avoidance and minimization measures to be analyzed in this MND (CEQA Guideline § 15070 and § 15071).

   b) The Department recommends avoidance of Joshua tree woodland communities and requests PRWA look at alternative locations to avoid this sensitive resource. CDFW-12

   c) If avoidance is not feasible, the Department recommends preserving Joshua tree woodland of similar quality with similar biological functions and values (i.e., adjacent to Little Rock Wash, similar Joshua tree age classes, recruitment, understory species) at a ratio of no less than 2:1 depending on the habitat quality being impacted to mitigate for direct and temporal loss of habitat. CDFW-13

   d) The Department recommends avoidance, followed by preservation of Joshua tree woodland habitat for mitigation. The practice of transplanting Joshua trees as mitigation is not recommended by the Department as suitable mitigation because this practice is scientifically experimental in nature and does not mitigate for the loss of this habitat on a vegetative community level. Decades of monitoring would be needed to assure that transplanted trees and associated understory survive, flower, and set seed within appropriate habitat in order to conclude that this proposal was successful to any level of certainty. CDFW-14

Hydrology

7) Lake and Streambed Alteration Agreements (LSA). As a Responsible Agency under CEQA Guidelines section 15381, the Department has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency, the Department may consider the Negative Declaration CDFW-15

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or Environmental Impact Report of the local jurisdiction (Lead Agency) for the project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.[1] CDFW-15

a) The project area supports aquatic, riparian, and wetland habitats; therefore, a preliminary jurisdictional delineation of the streams and their associated riparian habitats should be included in the MND. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by the Department.[2] Some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification. CDFW-16

b) In project areas which may support ephemeral streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of ephemeral channels and help maintain natural sedimentation processes; therefore, the Department recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral drainages. CDFW-17

c) Project-related changes in drainage patterns, runoff, and sedimentation should be included and evaluated in the environmental document. CDFW-18

d) The MND should analyze the impacts from adding year-round water to an arid stream. The inclusion of recycled water into Little Rock Wash would convert an arid, ephemeral stream into perennial system. Type conversion raises the risk for invasive species to colonize the wash. For example, the Project site has the potential to support coast horned lizard (*Phrynosoma coronatum*), a SSC. The introduction of water opens up the area for colonization by Argentine ants, which replace the native ants, the main food source eaten by coast horned lizards. Argentine ants need perennial water sources to persist, and are largely absent from natural, ephemeral stream systems. CDFW-19

8) Geomorphology and Soil Conditions. The MND should address the potential negative effects of siting a basin in an ephemerally active channel, and how this will affect hydrology, sediment transport, velocity changes in the areas where the channel will be narrowed, potential for down-cutting of the stream in narrowed areas, as well as how ponded water and the resulting seepage would affect the available soil moisture in this ecosystem. Available/increased sub-surface soil moisture that is available to plants in and adjacent to the stream would drastically alter the sustainability of the current vegetation, which contains plants, animals, and organisms edaphically adapted to the current, dry soil conditions. CDFW-20

[1] A notification package for a LSA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.
[2] Cowardin, Lewis M., et al. 1970. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

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We appreciate the opportunity to comment on the referenced MND. Questions regarding this letter and further coordination on these issues should be directed to Kelly Schmoker at Kelly.Schmoker@wildlife.ca.gov or (949) 581-1015.

Sincerely,

for

Betty Courtney
Environmental Program Manager
South Coast Region

ec: U.S. Fish and Wildlife Service, Ventura
Mr. Scott Morgan, State Clearinghouse
Ms. Erinn Wilson, CDFW, Los Alamitos
Ms. Victoria Chau, CDFW, Los Alamitos
Ms. Sarah Rains, CDFW, Ventura
Mr. Scott Harris, CDFW, Pasadena

11. Responses to Comments

Letter 1: Antelope Valley Air Quality Management District (AQMD)

Comment AQMD-1:

The comment provides the AQMD's concurrence with the analysis of air quality impacts and states that the proposed project would need to comply with all requirements of District Rule 403 for fugitive dust, including submittal of a Dust Control Plan prior to initiation of construction.

Response AQMD-1:

The PRWA acknowledges in the IS/MND that compliance with District Rule 403 is mandatory for all projects in the Mojave Desert Air Basin, and the air quality modeling accounts for implementation of appropriate control measures (IS/MND page 29). The PRWA would prepare a Dust Control Plan as applicable to the proposed project by District Rule 403.

Letter 2: Los Angeles County Department of Public Health (LAPH)

Comment LAPH-1:

The comment requests that the County's Cross Connection and Water Protection Control Program be added to the list of permitting agencies for the proposed project.

Response LAPH-1:

In response to the comment, the Cross Connection Plan approval by the Los Angeles County Department of Public Health, Cross Connection & Water Pollution Control Program, has been added to Table 2 on page 17.

Letter 3: California Department of Transportation (Caltrans)

Comment Caltrans-1:

The comment acknowledges that a Traffic Control Plan will be prepared and implemented for the proposed project per Mitigation Measure TRA-1. The comment states that oversize-transport vehicles on State highways will require a Caltrans Transportation Permit and that any work to be performed within the State right-of-way will need an Encroachment Permit. The comment recommends that large-size truck trips be limited to off-peak commute periods, similar to the requirement of Mitigation Measure TRA-1 to schedule truck trips outside of peak morning and evening commute hours.

Response Caltrans-1:

In response to the comment, a transportation permit has been added to the list of Caltrans approvals in Table 2 on page 17.

In addition, the following revisions are made to Mitigation Measure TRA-1, item (2):

2) Schedule truck trips, including large-size and oversize truck trips, outside of peak morning (7:00 a.m. to 9:00 a.m.) and evening (4:00 p.m. to 6:00 p.m.) commute hours.

Comment Caltrans-2:

The comment states that projects need to be designed to discharge clean run-off water and that storm water runoff is not permitted to discharge onto State highway facilities.

Response Caltrans-2:

Mitigation Measure HYDRO-7 (page 75) requires PRWA to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) that includes Best Management Practices (BMPs) that would ensure construction activities would not result in the discharge of polluted runoff and as such would protect surface and groundwater quality both onsite and offsite.

As stated on page 74 of the IS/MND, after construction of proposed pipelines within improved roadways (including State highway facilities) is complete, all ground surfaces would be restored to pre-project conditions. As such, the project would not alter existing drainage and runoff patterns and would not result in discharge to State highway facilities. Surface runoff from the pump station site would be minor and would be diverted to the County's curb-and-gutter storm drainage system (page 74).

Letter 4: Lahontan Regional Water Quality Control Board (RWQCB)

Comment RWQCB-1:

The comment states that the Lahontan RWQCB staff, acting as a responsible agency for the project is providing comments to specify the scope and content of the environmental information relating to their statutory responsibilities pursuant to CEQA Guidelines. The RWQCB recommends the following: (1) that PRWA establish background water quality for the native groundwater beneath the site prior to implementation of the recharge project, (2) that PRWA begin discussions with the State Water Board Division of Drinking Water (DDW) during the evaluation phase of the recharge project to meet public health requirements, and (3) a combination of sediment and erosion control BMPs be implemented to effectively treat post-construction storm water runoff and other clear-water discharges during the life of the project.

Response RWQCB-1:

In response to item (1), the Palmdale Water District (PWD), as the CEQA lead agency, will disclose native groundwater quality beneath the recharge project site in subsequent CEQA document, once the exact location and operation of the recharge project has been determined. In response to item (2), PWD will consult with DDW as required during development of the recharge project. In response to item (3), Mitigation Measure HYDRO-7 (page 75) requires PRWA to prepare and implement a SWPPP that includes BMPs to minimize erosion and sedimentation. HYDRO-7 includes the following element that addresses post-construction BMPs:

- Preparation of a site map and maintenance schedule for BMPs installed during construction designed to reduce or eliminate pollutants after construction is completed (post-construction BMPs).

Comment RWQCB-2:

The comment summarizes the proposed project description, stating that Phase 1 has already been built and that Phases 2 through 6 would be constructed within existing paved road right-of-way with the exception of Phase 5 that would extend along Avenue R east to Littlerock Creek. The comment states that PWD is evaluating the feasibility of Phase 5, which would provide up to 9,450 AFY of recycled water for groundwater recharge in Littlerock Creek.

Response RWQCB-2:

PRWA acknowledges the comment and clarifies that PWD is evaluating the feasibility of recharging recycled water in Littlerock Creek. As stated in the IS/MND on page 13, Phase 5 of the proposed project would only be constructed if the results of the ongoing feasibility study recommend implementing groundwater recharge in the area of Littlerock Creek adjacent to the terminus of the Phase 5 pipeline alignment.

Comment RWQCB-3:

The comment provides an overview of the Water Board's authority over waters of the State and the Lahontan RWQCB's responsibility for protection of water quality for such waters within the Lahontan Region, which includes the project site.

Response RWQCB-3:

PRWA acknowledges the comment. The comment does not state a specific concern about the adequacy of the IS/MND, and therefore, a response is not required pursuant to CEQA.

Comment RWQCB-4:

The comment states that disinfected tertiary recycled water meets Title 22 requirements for groundwater replenishment. The comment states that the dissolved solids and total nitrogen quality of disinfected tertiary recycled water produced at the PWRP is of lesser quality than native groundwater in the Antelope Valley. There, the comment states that in order to evaluate the impacts of groundwater recharge using this source water the PRWA should establish the background quality of groundwater prior to implementing recharge activities.

In addition, the comment states that an anti-degradation analysis should be completed to satisfy State Board Resolution No. 68-16, and a Groundwater Monitoring Plan should be prepared and implemented, including provisions for establishing background water quality for groundwater.

Response RWQCB-4:

The proposed project evaluated in the IS/MND does not include operation of a groundwater recharge project in Littlerock Creek. As stated on page 11:

> Any future implementation of groundwater recharge in Littlerock Creek would be subject to evaluation pursuant to CEQA, including public circulation of a future CEQA document that provides details of the groundwater project design and operation and assesses the location-specific environmental impacts.

PWD would be the lead agency for any future CEQA documentation for groundwater recharge in Littlerock Creek, and as appropriate the analysis will include water quality issues such as PWRP source water quality, compliance with recycled water regulations designed to protect environmental and public health, and environmental effects and constraints related to baseline groundwater quality. In addition, any and all permitting requirements related to water quality, discharges to water of the State, and using recycled water for groundwater replenishment will be addressed in future CEQA documentation.

The proposed project is a Recycled Water Facilities Plan that includes infrastructure (i.e., pipelines and a pump station) to deliver recycled water to end uses and end users in accordance with reasonably-foreseeable planned future projects. The goal of the Facilities Plan is to allow for the reuse of recycled water to offset potable demand and diversify the region's water supply options. As such, the Facilities Plan includes infrastructure sized to support the expected end uses for recycled water, including irrigation, commercial or industrial cooling systems, and potentially groundwater recharge. The impacts of installing and operating this infrastructure are disclosed in the IS/MND. As stated on page 13, the decision to implement Phase 5 depends on the results of the ongoing feasibility study.

Comment RWQCB-5:

The comment states that the IS/MND does not discuss the need to perform hydrostatic testing of the new distribution pipelines and laterals and that this activity may generate significant quantities of waste water and may require separate permits. The RWQCB requests PRWA consider capturing these clear-water discharges for reuse as dust control over the project site. The comment states that if land disposal is necessary that such discharge be done in a manner that maximizes infiltration and does not concentrate flows or result in erosion. The comment states that an appropriate combination of sediment and erosion control BMPs must be implemented for all clear-water discharges.

Response RWQCB-5:

Hydrostatic testing is described on page 14 of the IS/MND as part of the project construction process. The water used for hydrostatic testing would be disposed back into the sanitary sewer system. Any temporary approvals for test water use and discharge would be obtained by the construction contractor.

Comment RWQCB-6:

The comment states that BMPs that treat post-construction storm water runoff should be included as part of the project. The comment requests that vegetation clearing be kept to a minimum and where feasible existing vegetation be mowed to allow for reestablishment post-construction. The comment states that BMPs need to be implemented until vegetation has been restored to pre-project conditions.

Response RWQCB-6:

Mitigation Measure HYDRO-7 (page 75) requires PRWA to prepare and implement a SWPPP that includes BMPs to reduce pollutants in storm water discharges. HYDRO-7 includes the following element that addresses post-construction BMPs:

- Preparation of a site map and maintenance schedule for BMPs installed during construction designed to reduce or eliminate pollutants after construction is completed (post-construction BMPs).

Surface restoration is described on page 14 of the IS/MND as part of the project construction process. Damage to unpaved surfaces would be restored post-construction with annual grasses or native vegetation. In the event that the construction right-of-way includes special-status plant species that cannot be avoided, Mitigation Measure BIO-7 requires the construction contractor to salvage and stockpile the top 12 inches of soils in the construction zone, including plant material, for use in the restoration effort. In addition, Mitigation Measure BIO-7 requires PRWA to prepare and implement a special-status species salvage and replanting plan that would include measures to salvage, replant, and monitor the construction zone until native vegetation is re-established under the direction of CDFW and USFWS, as appropriate. These project elements and mitigation measures are adequate to ensure any disturbed vegetation would be restored to pre-project conditions.

Comment RWQCB-7:

The comment states that the disinfected tertiary recycled water produced at the PWRP is chlorinated and therefore would require additional treatment prior to use for groundwater recharge in order to avoid violation of the Basin Plan.

Response RWQCB-7:

See Response RWQCB-4.

Comment RWQCB-8:

The comment requests that PRWA evaluate the public health impacts for the Phase 5 groundwater recharge project.

Response RWQCB-8:

See Response RWQCB-4.

Comment RWQCB-9:

The comment states that obtaining a permit and conducting monitoring does not constitute adequate mitigation and that the IS/MND must specifically describe the BMPs and other measures used to mitigate project impacts.

Response RWQCB-9:

The IS/MND includes BMPs and mitigation measures to reduce project impacts to less than significant levels. The comment does not specifically identify any project impacts that require additional BMPs or mitigation measures.

Comment RWQCB-10:

The comment states that numerous project activities has potential to impact waters of the State and thus may require permits from the SWRCB or Lahontan RWQCB. For example, clear-water discharges from hydrostatic and tank testing to onsite ephemeral drainages may be subject to permit requirements.

Response RWQCB-10:

The IS/MND states that water used for hydrostatic testing would be disposed back into the sanitary sewer system. See Response RWQCB-5.

Comment RWQCB-11:

The comment states that the proposed project may require a Clean Water Act Section 401 Water Quality Certification.

Response RWQCB-11:

On page 43 of the IS/MND, the PRWA acknowledges that the proposed project would be under the jurisdiction of the Lahontan RWQCB and subject to Section 401 of the Clean Water Act (CWA) and as such, a Water Quality Certification for dredging, filling or excavation of Little Rock Wash may be required for the project. In response to the comment, a Section 401 Water Quality Certification has been added to the approvals listed in Table 2 on page 17.

Comment RWQCB-12:

The comment states that land disturbance of one acre or more may require a CWA Section 402(p) storm water permit, including an NPDES General Construction Storm Water Permit or individual storm water permit from the Lahontan RWQCB.

Response RWQCB-12:

As stated on page 73 of the IS/MND, Littlerock Creek is not defined as a water of the United States. Thus, discharges resulting from the proposed project would not be subject to regulation under the NPDES program and would not be required to file a Notice of Intent to comply with the State's General Construction Stormwater NPDES permit. The PRWA acknowledges that Littlerock Creek is considered waters of the State and under the jurisdiction of the Lahontan RWQCB. In response to the comment the following text has been revised on page 73 of the IS/MND:

> The U.S. Army Corp of Engineers has determined that Littlerock Creek is not defined as a water of the United States because it flows to a closed internal dry lake basin (Rosamond Dry Lake), which is wholly within the State of California (Lahontan RWQCB, 2004). Therefore, discharges resulting from the proposed project would not be subject to regulation under the NPDES program and would not be required to file a Notice of Intent to comply with the State's General Construction Stormwater NPDES permit or prepare a Storm Water Pollution Prevention Plan (SWPPP). However, State standards apply to Littlerock Creek as waters of the State under the State Porter-Cologne Water Quality Control Act (California Water Code § 13000 et seq.). Section 13260(a) of the California Water Code (Water Code) requires that any person discharging waste or proposing to discharge waste within any region, other than to a community sewer system, which could affect the quality of the waters of the State, file a report of waste discharge (ROWD). PRWA would be required to prepare and submit to the Lahontan RWQCB a ROWD for placing fill in the channel of Littlerock Creek.
>
> ~~However, the~~ In addition, the Lahontan RWQCB encourages implementation of best management practices (BMPs) similar to those required for NPDES storm water permits to protect waters of the state (Lahontan RWQCB, 2004) and to protect the water quality objectives and beneficial uses of local surface waters as provided in the Lahontan Region Water Quality Control Plan (Basin Plan) (RWQCB, 1995). Applicable BMPs are identified in the California Stormwater Quality Association's *California Storm Water Best Management Practices Handbook for Construction* (CASQA, 2011). **Mitigation Measure HYDRO-7** below would require that PRWA prepare BMPs to be implemented to ensure pipeline construction activities would not degrade surface or groundwater quality.

In addition, in response to the comment, a Report of Waste Discharge has been added to the list of approvals in Table 2 on page 17.

Comment RWQCB-13:

The comment states that using recycled water for groundwater replenishment requires waste discharge requirements/water recycling requirements (WDRs/WRRs) from the Lahontan RWQCB. An engineering report is required as part of this permit application process. The comment also states that the requirements of the groundwater replenishment regulations (effective June 18, 2014) also apply. The comment recommends technical discussions with the SWRCB DDW during the feasibility assessment for the recharge project.

Response RWQCB-13:

See Response RWQCB-4.

Comment RWQCB-14:

The comment states that if requirements for the above-mentioned permits are triggered, the project proponent must consult with Lahontan RWQCB staff in advance of project construction.

Response RWQCB-14:

The comment is noted.

Letter 5: California Department of Fish and Wildlife (CDFW)

Comment CDFW-1:

The comment summarizes the project description and requests more information about Phase 5 of the project and its relationship to the subsequent recharge basin in Little Rock Wash.

Response CDFW-1:

The proposed project is a Recycled Water Facilities Plan that includes infrastructure (i.e., pipelines and a pump station) to deliver recycled water to end uses and end users in accordance with reasonably-foreseeable planned future projects. The goal of the Facilities Plan is to allow for the reuse of recycled water to offset potable demand and diversify the region's water supply options. As such, the Facilities Plan includes infrastructure sized to support the expected end uses for recycled water, including irrigation, commercial or industrial cooling systems, and potentially groundwater recharge. The impacts of installing and operating this infrastructure are disclosed in the IS/MND. As stated on page 13, the decision to implement Phase 5 of the pipeline depends on the results of the ongoing feasibility study being conducted by PWD regarding the use of recycled water for groundwater recharge in Littlerock Creek.

The proposed project evaluated in the IS/MND does not include operation of a groundwater recharge project in Littlerock Creek. As stated on page 11:

> Any future implementation of groundwater recharge in Littlerock Creek would be subject to evaluation pursuant to CEQA, including public circulation of a

future CEQA document that provides details of the groundwater project design and operation and assesses the location-specific environmental impacts.

PWD will be the lead agency for any future CEQA documentation for groundwater recharge in Littlerock Creek, and as appropriate the analysis will include impacts to biological resources once the exact location and extent of groundwater basins are identified. In addition, any and all permitting requirements related to biological resources will be addressed in future CEQA documentation.

In response to the comment, Phase 5 of the pipeline has been removed from the proposed project evaluated in this IS/MND. PRWA will not certify that the Final IS/MND as currently compiled is sufficient to approve Phase 5. PRWA will certify that the remaining phases of the Facilities Plan – Phase 1 (already built), Phase 2, Phase 3, Phase 4, and Phase 6 – are evaluated in this Final IS/MND at a sufficient level of detail to allow for project approval and implementation. In the future, if the groundwater recharge project in Littlerock Creek is implemented, the CEQA documentation for such project will include an evaluation of any and all recycled water pipelines needed to serve the project.

Comment CDFW-2:

The comment requests that the IS/MND discuss the potential direct and indirect impacts to biological resources that may occur as a result of implementing groundwater recharge in Little Rock Wash, in a manner that reflects the whole of the action per CEQA Guidelines.

Response CDFW-2:

See Response CDFW-1.

Comment CDFW-3:

The comment requests that PRWA identify alternative locations for the Phase 5 pipeline in order to avoid and reduce impacts in biologically sensitive areas, including Little Rock Wash and Joshua tree woodland habitat. The comment states that absent enforceable mitigation measures with associated performance standards, CDFW cannot support the conclusions of the MND that impacts to Little Rock Wash will be mitigated to less than significant levels.

Response CDFW-3:

The analysis in the IS/MND does not find significant impacts to biological resources. With implementation of Mitigation Measures BIO-1 through BIO-11, impacts are determined to be less than significant, including those associated with implementation of the Phase 5 pipeline. As such, per the requirements of CEQA, alternative pipeline alignments are not required to be evaluated (CEQA Guidelines Section 15126.6).

Nonetheless, as mentioned previously, Phase 5 of the pipeline has been removed from the proposed project evaluated in this IS/MND. PRWA will not certify that the Final IS/MND as currently compiled is sufficient to approve Phase 5. PRWA will certify that the remaining phases of the Facilities Plan – Phase 1 (already built), Phase 2, Phase 3, Phase 4, and Phase 6 – are evaluated in this Final IS/MND at a sufficient level of detail to allow for project approval and implementation. In the future, if the groundwater recharge project in Littlerock Creek is implemented, the CEQA documentation for such project will include an evaluation of any and all recycled water pipelines needed to serve the project.

Comment CDFW-4 and CDFW-5:

The comment states that the IS/MND identifies the potential for sensitive species to occur within the project footprint along with mitigation measures to bring impacts below significance thresholds. The comment requests a complete analysis of baseline conditions for the project site, including specific surveys for sensitive species, to support such conclusions. In addition, in order for CDFW to comment on how the proposed project would avoid or minimize environmental impacts where feasible, the comment requests: (1) surveys during the appropriate time of year for species that will be impacted, (2) regional significance of impacts to species' populations, and (3) alternative pipeline and basin locations that avoid impacts to Little Rock Wash.

Response CDFW-4 and CDFW-5:

A Biological Resources Technical Report (BRTR) is included as Appendix B in the IS/MND. The BRTR documents the results of a biological survey of the project footprint, conducted to describe and map plant communities and potential jurisdictional resources, assess the habitat on the project site for the ability to support special status species and sensitive natural communities, and to note any wildlife or signs observed. The BRTR includes an analysis of impacts relative to baseline conditions and development of recommended mitigation measures for special-status species that either were documented to occur or have potential to occur within the project area. Such mitigation measures are included in the IS/MND.

Given that all potential impacts to special-status species are mitigated to less than significant levels, there are no regionally significant impacts to species populations identified in the IS/MND. Also, alternative pipeline locations are not required to be evaluated since there are no unmitigated potentially significant impacts (see Response CDFW-3 above). The IS/MND does not include an analysis of impacts associated with recharge basins, and as such alternative basin locations also are not discussed (see Response CDFW-1 above).

Comment CDFW-6:

The comment states that if impacts to sensitive plant species cannot be avoided, then CDFW recommends conserving land with existing, high conservation value populations of the subject species already occurring, and preserving this habitat in perpetuity with a conservation agency.

Response CDFW-6:

As described in the IS/MND, impacts to special-status plant species would only occur on a temporary basis during construction due to ground disturbance. On page 14 of the IS/MND, surface restoration is described as part of the project construction process. Damage to unpaved surfaces would be restored post-construction with annual grasses or native vegetation. In the event that the construction right-of-way includes special-status plant species that cannot be avoided, Mitigation Measure BIO-7 requires the construction contractor to salvage and stockpile the top 12 inches of soils in the construction zone, including plant material, for use in the restoration effort. In addition, Mitigation Measure BIO-7 requires PRWA to prepare and implement a special-status species salvage and replanting plan that would include measures to salvage, replant, and monitor the construction zone until native vegetation is re-established under the direction of CDFW and USFWS, as appropriate. These project elements and mitigation measures are adequate to ensure any disturbed vegetation would be restored to pre-project conditions.

Comment CDFW-7:

The comment states that CDFW considers impacts to Sensitive Plant Communities significant. The comment states that plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level, and these ranks can be obtained by querying the CNDDB. The comment recommends PRWA conduct focused surveys for Rare, Threatened, and Endangered plants and disclose the findings in the final MND.

Response CDFW-7:

As stated in the IS/MND on page 34, the methodologies utilized to collect baseline data, describe biological resources, and analyze potential impacts are provided in the BRTR included as Appendix B. As described on page 9 of the BRTR, the CNDDB was queried for Rare, Threatened, and Endangered species in the project area. During the field survey of the project footprint, the only special-status plant species or community identified was Joshua Tree Woodland, primarily along the Phase 5 pipeline alignment (see Figure 4 in Appendix B). As stated on page 35 of the IS/MND, there is approximately five acres of Joshua tree Woodland within the project footprint. Mitigation Measure BIO-7 requires PRWA to conduct a pre-construction plant survey to determine and map the location and extent of special-status plant species populations within the construction right-of-way.

Comment CDFW-8:

The comment states that CDFW considers adverse impacts to species protected by the California Endangered Species Act (CESA) to be significant without mitigation, for purposes of CEQA. If any project-related activity would result in take of a species designated as endangered, threatened, or candidate for listing under the CESA, then appropriate take authorization is required. CDFW

may be required to issue a separate CEQA document for issuance of an Incidental Take Permit (ITP). The comment requests that the IS/MND include a biological mitigation monitoring and report proposal of sufficient detail to satisfy the requirements of a CESA ITP.

Response CDFW-8:

The IS/MND identifies the potential for the project to affect the Swainson's hawk and the Mohave ground squirrel, both State Threatened species. With implementation of Mitigation Measures BIO-4 and BIO-6, impacts to both species are determined to be less than significant. The Final IS/MND will include PRWA's mitigation monitoring and reporting program that will ensure such mitigation measures are implemented and documented.

Comment CDFW-9:

The comment requests that surveys for Mohave ground squirrel (MGS) be conducted and the results disclosed in the CEQA document to allow CDFG to fully evaluate impacts to the species and the effectiveness of any proposed mitigation. The comment states that an ITP would be needed to allow lawful incidental take of MGS, and CDFG recommends PRWA obtain an ITP for MGS to avoid construction delays should MGS be detected prior to or during construction.

Response CDFW-9:

Mitigation Measure BIO-6 requires pre-construction presence/absence surveys for MGS in areas with potential MGS habitat. Surveys will be conducted in accordance with the latest CDFW Mohave Ground Squirrel Survey Guidelines. Requirements for mitigation are included in the event that presence of MGS is confirmed. PRWA will secure any permits required by law prior to project construction, including an ITP if necessary.

Comment CDFW-10:

The comment states that the MND should be corrected to reflect the Townsend's big-eared bat as a candidate species under the CESA.

Response CDFW-10:

The Townsend's big-eared bat is identified as a candidate species on page 37 of the IS/MND. In response to the comment the following sentence on page 42 of the IS/MND has been revised as follows:

> Townsend's big-eared bat is a state Species of Special Concern and a candidate species under the California Endangered Species Act.

Comment CDFW-11:

The comment requests that the IS/MND disclose impacts to Joshua tree woodlands in individual trees and acres.

Response CDFW-11:

As stated on page 35 of the IS/MND, there is approximately five acres of Joshua tree woodland within the project footprint along the Phase 5 pipeline alignment. This is also shown graphically in Figure 4 of the BRTR in Appendix B.

Comment CDFW-12:

The comment states that CDFW recommends avoidance of Joshua tree woodland communities and requests PRWA look at alternative locations to avoid this sensitive resource.

Response CDFW-12:

As stated above in Response CDFW-3, the analysis in the IS/MND does not find significant impacts to Joshua tree woodland. With implementation of Mitigation Measure BIO-10, impacts are determined to be less than significant. As such, per the requirements of CEQA, alternative pipeline alignments are not required to be evaluated (CEQA Guidelines Section 15126.6). In addition, Mitigation Measure BIO-10 requires PRWA to prevent permanent native vegetation loss to the extent feasible and identifies mitigation measures to be implemented only in the event that removal of Joshua trees is otherwise required.

In addition, as mentioned previously, Phase 5 of the pipeline has been removed from the proposed project evaluated in this IS/MND. Therefore, no Joshua tree woodlands would be affected with implementation of the proposed project.

Comment CDFW-13:

The comment states that in the event that avoidance of Joshua tree woodland is not feasible, CDFW recommends preservation of Joshua tree woodland at a ratio of no less than 2:1 to mitigate for loss of habitat.

Response CDFW-13:

Mitigation Measure BIO-10 provides measures to mitigate direct impacts to Joshua tree woodland in the event that avoidance is not feasible. Mitigation Measure BIO-10 requires PRWA to obtain a desert vegetation removal permit from the City of Palmdale, the terms and conditions of which would include a minimum preservation standard of two Joshua trees per gross acre, averaged for the gross site area covered by the project development. Mitigation Measure BIO-10 requires the terms and conditions of the permit to be determined in conjunction with consultation with CDFW.

In addition, as mentioned previously, Phase 5 of the pipeline has been removed from the proposed project evaluated in this IS/MND. Therefore, no Joshua tree woodlands would be affected with implementation of the proposed project.

Comment CDFW-14:

The comment states that CDFW recommends avoidance, followed by preservation of Joshua tree woodland habitat for mitigation. CDFW does not recommend transplanting Joshua trees as suitable mitigation.

Response CDFW-14:

PRWA does not commit to transplanting Joshua trees as mitigation for impacts to Joshua tree woodland habitat. In accordance with the comment, Mitigation Measure BIO-10 requires PRWA first to prevent permanent native vegetation loss, which would include Joshua tree woodland, to the extent feasible. Mitigation Measure BIO-10 secondarily identifies mitigation measures to be implemented only in the event that removal of Joshua trees is otherwise required. Such measures include preservation of Joshua tree woodland habitat.

In addition, as mentioned previously, Phase 5 of the pipeline has been removed from the proposed project evaluated in this IS/MND. Therefore, no Joshua tree woodlands would be affected with implementation of the proposed project.

Comment CDFW-15 and CDFW-16:

Comment CDFW-15 generally states the CDFW's authority as a Responsible Agency under CEQA with respect to activities in streams and/or lakes and states the requirements for determining whether a Lake and Streambed Alteration Agreement (LSA) would be required for a project. The comment states the CDFW's requirements for CEQA compliance prior to issuance of an LSA.

Comment CDFW-16 states that the proposed project area supports aquatic, riparian, and wetland habitats and that a preliminary jurisdictional delineation of the streams and their associated riparian habitats should be included in the MND. The comment states that the delineation should be conducted pursuant to the U.S. Fish and Wildlife Service wetland definition adopted by CDFW. The comment also states that CDFW's authority may extend beyond the limits of the U.S. Army Corp of Engineers Section 404 permit and RWQCB Section 401 Certification.

Response CDFW-15 and CDFW-16:

A preliminary jurisdictional resource assessment was conducted during the biological field survey for the project, as documented on page 11 of the BRTR in Appendix B. The assessment evaluated features potentially regulated by the U.S. Army Corp of Engineers (USACE), CDFW, and/or Lahontan RWQCB. As stated on page 43 of the IS/MND, there are no federal waters of the U.S. in the project area and therefore there would be no jurisdictional features subject to Section 404

permitting by the USACE. Also stated on page 43 of the IS/MND is the determination that Little Rock Wash does not support riparian vegetation or habitat within the project footprint where only upland desert scrub species were observed. The IS/MND does determine that the project would be under the jurisdiction of the Lahontan RWQCB and subject to Section 401 of the CWA, requiring a Water Quality Certification for dredging, filling, or excavation of Little Rock Wash (page 43). The IS/MND also acknowledges that Little Rock Wash is an ephemeral wash subject to regulation of CDFW under Section 1602 of the California Fish and Game Code, and as such the project would require a LSA with CDFW.

In addition, as mentioned previously, Phase 5 of the pipeline has been removed from the proposed project evaluated in this IS/MND. As such, the proposed project would have no impact to riparian vegetation or habitat or Little Rock Wash as waters of the State.

Comment CDFW-17:

The comment states that herbaceous vegetation, woody vegetation, and woodlands protect the integrity of ephemeral channels. The comment states CDFW's recommendation for establishment of setbacks from ephemeral drainages and maintenance of appropriately-sized vegetated buffer areas in order to protect the integrity of ephemeral channels and help maintain natural sedimentation processes.

Response CDFW-17:

PRWA acknowledges the comment. The comment does not state a specific concern about the adequacy of the IS/MND, and therefore a direct response is not able to be provided. As stated on page 43 of the IS/MND, upland desert scrub species were observed within the project footprint within Little Rock Wash. The proposed project includes restoration of surface features to pre-construction conditions, as described above under Response CDFW-6. Such restoration will ensure the integrity of ephemeral channels is maintained along with natural sedimentation processes.

In addition, as mentioned previously, Phase 5 of the pipeline has been removed from the proposed project evaluated in this IS/MND. As such, the proposed project would have no impact to ephemeral channels such as Little Rock Wash.

Comment CDFW-18:

The comment states that project-related changes in drainage patterns, runoff, and sedimentation should be included and evaluated in the environmental document.

Response CDFW-18:

Drainage, runoff, and sedimentation are evaluated in the IS/MND on pages 73 and 74.

Comment CDFW-19:

The comment states that the IS/MND should analyze the impacts from adding year-round water to an arid stream.

Response CDFW-19:

The proposed project evaluated in the IS/MND does not include operation of a groundwater recharge project in Littlerock Creek. Please refer to Response CDFW-1.

Comment CDFW-20:

The comment states that the IS/MND should analyze the impacts from siting a recharge basin in an ephemerally active channel and how this would affect hydrology, sediment transport, velocity changes in the area, among other things.

Response CDFW-20:

The proposed project evaluated in the IS/MND does not include operation of a groundwater recharge project or recharge basins in Littlerock Creek. Please refer to Response CDFW-1.

12. Corrections and Additions to the IS/MND

This section provides a summary of all revisions made to the IS/MND. Where the responses indicate additions or deletions to the text of IS/MND, additions are included as underlined text, and deletions as ~~stricken text~~. The revisions do not significantly alter the conclusions in the IS/MND.

In addition, as mentioned previously in Section 10, in response to comments, Phase 5 of the Recycled Water Facilities Plan has been removed from the proposed project evaluated in this IS/MND. PRWA will not certify that the Final IS/MND as currently compiled is sufficient to approve Phase 5. PRWA will certify that the remaining phases of the Facilities Plan – Phase 1 (already built), Phase 2, Phase 3, Phase 4, and Phase 6 – are evaluated in this Final IS/MND at a sufficient level of detail to allow for project approval and implementation.

Page 1:

> Wastewater collection and treatment in and around the PRWA service area is provided by Los Angeles County Sanitation District (LACSD), Nos. 14 and 20. The two districts serve a combined wastewater service area of approximately ~~76~~ 101 square miles and more than 310,000 people.

Page 3:

> The Palmdale Water Reclamation Plant (PWRP) is located in the City of Palmdale and currently provides tertiary treatment for, on average, 9.2 mgd of wastewater generated in and around the City of Palmdale.

Page 3:

> The Lancaster Water Reclamation Plant (LWRP) is located in the City of Lancaster and currently provides tertiary treatment for, on average, ~~12~~ 13.7 mgd of wastewater generated in both the Cities of Lancaster and Palmdale.

Page 17:

TABLE 2
REGULATORY REQUIREMENTS AND AUTHORIZATIONS

Agency	Type of Approval
California Department of Fish and Wildlife (CDFW)	Section 1602 Streambed Alteration Agreement
Antelope Valley Air Quality Management District	Permit to Construct
California Department of Transportation (Caltrans)	Encroachment Permit, Transportation Permit
State Water Resources Control Board	Notice of Intent to comply with Landscape Irrigation General Permit
Los Angeles County Department of Public Works	Roadway Encroachment Permit
Lahontan Regional Water Quality Control Board	Clean Water Act Section 401 Water Quality Certification, Report of Waste Discharge
City of Palmdale	Roadway Encroachment Permit
Los Angeles County Sanitation District	Easements at PWRP, Landscape irrigation approvals
Los Angeles County Department of Public Health, Cross Connection & Water Pollution Control Program	Cross Connection Plan Approval

Page 42:

Townsend's big-eared bat is a state Species of Special Concern and a candidate species under the California Endangered Species Act.

Page 73:

The U.S. Army Corp of Engineers has determined that Littlerock Creek is not defined as a water of the United States because it flows to a closed internal dry lake basin (Rosamond Dry Lake), which is wholly within the State of California (Lahontan RWQCB, 2004). Therefore, discharges resulting from the proposed project would not be subject to regulation under the NPDES program and would not be required to file a Notice of Intent to comply with the State's General Construction Stormwater NPDES permit or prepare a Storm Water Pollution Prevention Plan (SWPPP). However, State standards apply to Littlerock Creek as waters of the State under the State Porter-Cologne Water Quality Control Act (California Water Code § 13000 et seq.). Section 13260(a) of the California Water Code (Water Code) requires that any person discharging waste or proposing to discharge waste within any region, other than to a community sewer system, which could affect the quality of the waters of the State, file a report of waste discharge (ROWD). PRWA would be required to prepare and submit to the Lahontan RWQCB a ROWD for placing fill in the channel of Littlerock Creek.

~~However, the~~ In addition, the Lahontan RWQCB encourages implementation of best management practices (BMPs) similar to those required for NPDES storm

water permits to protect waters of the state (Lahontan RWQCB, 2004) and to protect the water quality objectives and beneficial uses of local surface waters as provided in the Lahontan Region Water Quality Control Plan (Basin Plan) (RWQCB, 1995). Applicable BMPs are identified in the California Stormwater Quality Association's *California Storm Water Best Management Practices Handbook for Construction* (CASQA, 2011). **Mitigation Measure HYDRO-7** below would require that PRWA prepare BMPs to be implemented to ensure pipeline construction activities would not degrade surface or groundwater quality.

Page 101:

TRA-1: Prepare and Implement a Traffic Control Plan. The PRWA shall require its construction contractor to prepare and implement an effective Traffic Control Plan to show specific methods for maintaining traffic flows. Examples of traffic control measures to be considered include:

1) Develop circulation and detour plans to minimize impacts to local street circulation, including use of signing and flagging to guide vehicles through and/or around the construction zone.

2) Schedule truck trips, <u>including large-size and oversize truck trips,</u> outside of peak morning (7:00 a.m. to 9:00 a.m.) and evening (4:00 p.m. to 6:00 p.m.) commute hours.

13. Mitigation Monitoring and Reporting Program

13.1 CEQA Requirements for Mitigation Monitoring and Reporting Program

Section 15091(d) and Section 15097 of the CEQA Guidelines require a public agency to adopt a program for monitoring or reporting on the changes it has required in the project or conditions of approval to substantially lessen significant environmental effects. Accordingly, the Mitigation Monitoring and Reporting Program (MMRP) is hereby adopted for this project.

This MMRP summarizes the mitigation commitments identified in the Palmdale Recycled Water Authority (PRWA) Recycled Water Facilities Plan Initial Study/Mitigated Negative Declaration (State Clearinghouse No. 2014101064). Mitigation measures are presented in the same order as they occur in the Final IS/MND.

As mentioned previously in Section 10 of the Final IS/MND, in response to comments made during the public review period, Phase 5 of the Recycled Water Facilities Plan has been removed from the proposed project. PRWA will not certify that the Final IS/MND as currently compiled is sufficient to approve Phase 5. As such the following mitigation measures listed below in the MMRP may not be applicable to the proposed project since they are associated with impacts that would only occur with implementation of Phase 5: BIO-8, BIO-10, and BIO-11.

The columns in the MMRP table provide the following information:

- **Mitigation Measure(s):** The action(s) that will be taken to reduce the impact to a less-than-significant level.
- **Implementation, Monitoring, and Reporting Action:** The appropriate steps to implement and document compliance with the mitigation measures.
- **Responsibility:** The agency or private entity responsible for ensuring implementation of the mitigation measure. However, until the mitigation measures are completed, The Palmdale Recycled Water Authority, as the CEQA Lead Agency, remains responsible for ensuring that implementation of the mitigation measures occur in accordance with the program (CEQA Guidelines, Section 15097(a)).
- **Monitoring Schedule:** The general schedule for conducting each monitoring task, either prior to construction, during construction and/or after construction.

MITIGATION MONITORING AND REPORTING PROGRAM
FOR THE PALMDALE RECYCLED WATER AUTHORITY RECYCLED WATER FACILITIES PLAN

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
Aesthetics			
AES-1: Prevent Light and Glare Associated with Nighttime Construction. The PRWA shall ensure the construction contractor uses construction lighting that is shielded and directed downward to illuminate only the necessary work space and avoid light spill onto neighboring residential properties.	• Include mitigation measure in construction contractor specifications. • Retain copies of construction contractor specifications in project files.	PRWA	Before and During Construction
AES-2: Prevent Light and Glare Associated with Proposed Facilities. The PRWA shall require the construction contractor to apply to the pump stations and other aboveground appurtenances non-glare exterior coatings that are colored an earth tone to blend in with the surrounding landscape. The PRWA shall also require that all lights be shielded and faced downward so as not to create glare on adjacent roadways or private properties.	• Include mitigation measure in project design specifications. • Ensure design specifications are included in construction contractor specifications. • Retain copies of design and contractor specifications in project files. • Perform site inspections to verify contractor compliance. Retain inspection records in the project file.	PRWA	Before, During and After Construction
Biological Resources			
BIO-1: Prior to ground disturbing activities, a qualified biologist shall conduct pre-construction clearance surveys in areas where potential habitat exists for silvery legless lizard, coast horned lizard, southern grasshopper mouse, and American badger. Appropriate survey methods shall be implemented to determine the presence or absence of these species, such as raking surveys for silvery legless lizard, pedestrian transect surveys for coast horned lizard and American badger dens, and trapping surveys for southern grasshopper mouse. If surveys determine that a special-status species is present, the species shall be relocated by a qualified biologist to suitable habitat located outside of the project area, but in the immediate vicinity. The recipient area(s) shall be identified prior to relocating any animals and shall be approved by the CDFW. The qualified biologist shall have a valid CDFW Scientific Collection Permit.	• Include mitigation measure in construction contractor specifications. • Retain copies of the survey(s) in the project file. • Retain copies of correspondence with CDFW in the project file • Prepare reports to document any species relocation activities, and retain such reports in the project file.	PRWA	Before Construction
BIO-2: All steep-walled trenches or excavation pits used during construction shall be covered at all times except when being actively utilized. Covers shall be strong enough to prevent wildlife from falling through and shall be designed to exclude small animals, including coast horned lizard and southern grasshopper mouse. If the trenches or excavations cannot be covered, exclusion fencing constructed of materials that would exclude both large and small wildlife species shall be installed around the trench or excavation to prevent entrapment of wildlife. Open trenches, or other excavations that could entrap wildlife shall be inspected daily and immediately before backfilling. If present, construction shall not occur until the animal has left the trench or been removed by a qualified biologist as feasible. Employees and contractors shall look under vehicles and equipment for the presence of wildlife before movement. If wildlife is observed, no vehicles or equipment shall be moved until the animal has left voluntarily or is removed by the biological monitor. No listed species shall be handled.	• Include mitigation measure in construction contractor specifications. • Perform site inspections to verify contractor compliance with the plan. Retain inspection reports in project files.	PRWA; Construction Contractor	During Construction

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BIO-3: A Worker Environmental Awareness Program (WEAP) shall be implemented to educate construction crews and contractors on sensitive biological resources that could occur on the project site. As part of the WEAP, special-status species with potential to occur on the project site would be reviewed along with relevant protection plans and avoidance measures to be implemented. The WEAP shall be required for all associated personnel prior to the commencement of construction activities and a record of participation shall be maintained.	• Include mitigation measure in construction contractor specifications. • Retain copies of the WEAP in the project file. • Participation records shall be maintained in the project file.	PRWA; Construction Contractor	Before and During Construction
BIO-4: If construction and vegetation removal is proposed during the typical bird nesting period (February 1 through August 31), preconstruction surveys for nesting/roosting bird species shall be conducted by a qualified biologist within 30 days prior to construction, with at least one survey conducted no more than five days prior to the onset of construction (or vegetation removal). The surveys shall include habitats within 500 feet of the construction limits. This survey shall include species protected under the MBTA including the Cooper's hawk, ferruginous hawk, Swainson's hawk, prairie falcon, loggerhead shrike, and Le Conte's thrasher. The survey shall cover all reasonably potential nesting locations for the relevant species on or closely adjacent to the project site. Active nest sites located during the pre-construction surveys shall be avoided and a non-disturbance buffer zone established dependent on the species as determined by a qualified biologist. Buffer distances are typically 300 feet for common birds and passerine species and 500 feet for raptors and special-status species. The buffer zone shall be delineated in the field with flagging, stakes or construction fencing. Nest sites shall be avoided until the adults and young are no longer reliant on the nest site for survival as determined by a qualified biologist.	• Include mitigation measure in construction contractor specifications. • Retain copies of pre-construction surveys in project file. • Perform site inspections to verify contractor compliance with the biologist recommendations. Retain inspection records in the project file.	PRWA; Construction Contractor	Before and During Construction
BIO-5: A pre-construction survey shall be conducted within areas containing suitable habitat for burrowing owls 14 to 30 days prior to clearing of the site by a qualified biologist in accordance with the most recent CDFW protocol, currently the *Staff Report on Burrowing Owl Mitigation* (CDFW, 2012). Surveys shall cover areas disturbed by construction including a 150 meter (500 feet) buffer. The survey would identify adult and juvenile burrowing owls and signs of burrowing owl occupation. If potential presence is determined through an initial survey, three additional surveys shall be conducted between April 15 and July 15 when detection is most likely. Surveys shall be conducted at least three weeks apart to ensure that all individuals or owl pairs have been located. • If occupied burrowing owl habitat is detected on or adjacent (i.e., within 500 feet) to the proposed project site, measures to avoid, minimize, or mitigate impacts shall be incorporated into the project and shall include the following: o Construction exclusion areas shall be established around the occupied burrows in which no disturbance shall be allowed to occur while the burrows are occupied. During the non-breeding season (October 16 through March 15), the exclusion zone shall extend 50 meters (165 feet) around the occupied burrows. During the breeding season (April 1 through October 15), exclusion	• Include mitigation measure in construction contractor specifications. • Retain copies of pre-construction surveys in project file. • Retain copies of correspondence with CDFW in the project file • Prepare reports to document any species relocation or exclusion activities, and retain such reports in the project file. • Perform site inspections to verify contractor compliance with any necessary exclusion areas. Retain records in project file.	PRWA; Construction Contractor	Before and During Construction

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areas shall extend 200 meters (650 feet) around occupied burrows. o Passive relocation of on-site owls may be implemented during the non-breeding season after coordinating with CDFW. Passive relocation shall be accomplished by installing one-way doors on the entrances of burrows located within 50 meters of the project site. The one-way doors shall be left in place for 48 hours to ensure that the owls have left the burrow. o For each burrow affected by project construction, two alternate unoccupied natural or artificial burrows shall be provided outside of the 50-meter buffer zone (CDFW, 2012). The alternate burrows shall be monitored daily for one week to confirm that owls have moved and acclimated. When the project is completed the habitat shall be restored and the exclusionary devices shall be removed from the natural burrows.			
BIO-6: Prior to project implementation, a habitat assessment shall be conducted by a qualified biologist to determine the potential for the Mohave ground squirrel to occur within and adjacent to the project site. If the habitat assessment determines that there is potential for occurrence within 300 feet of the construction zone, then the PRWA has two options: 1) Assume the Mohave ground squirrel is present and mitigate for the loss of suitable habitat at a 2:1 ratio, or a ratio approved by the CDFW. Mitigation may be achieved by purchasing suitable habitat off site or through payment of fees to a mitigation bank or other established and approved program (e.g., in-lieu fee program). The location or payment structure shall be determined and approved by CDFW prior to implementation of the project. 2) Conduct surveys to determine presence or absence. Surveys that include trapping shall be authorized by a Memorandum of Understanding (MOU) with the CDFW or by other permit as determined by the CDFW, and be undertaken only by a qualified biologist. Surveys shall be conducted in accordance with the latest CDFW *Mohave Ground Squirrel Survey Guidelines* (currently January 2003; minor process and contact changes in July 2010). If no Mohave ground squirrels are trapped during the protocol surveys, no more actions are required. However, if presence is determined, mitigation will include compensation of habitat loss as specified in Number 1 above.	• Include mitigation measure in construction contractor specifications. • Retain copies of the habitat assessment report in the project file. • Retain copies of the survey report in the project file, if conducted. • Retain copies of correspondence with CDFW or any required MOU in the project file. • If habitat compensation is required, prepare reports to document ratio approved by CDFW and location of suitable habitat or payment to suitable mitigation bank.	PRWA	Before Construction

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BIO-7: The PRWA shall have a qualified biologist conduct a pre-construction plant survey to determine and map the location and extent of special-status plant species populations within the construction right-of-way. The project shall minimize impacts on special-status plant species by reducing the construction right-of-way through areas with documented occurrences of special-status plant species if any are found. • If special-status plant populations are identified within the construction right-of-way, the construction contractor shall stake, flag, fence, or otherwise clearly delineate the construction right-of-way that restricts the limits of construction to the minimum necessary to implement the project that also would minimize impacts on special-status plants. • If special-status plant populations are identified within the construction right-of-way, the construction contractor shall salvage and stockpile the top 12 inches of soil in the construction zone, including plant material and duff for use in the restoration efforts. • If special-status plant populations are identified within the construction right-of-way, the PRWA shall prepare and implement a special-status species salvage and replanting plan, for unavoidable temporary impacts on special-status plants. The salvage and replanting plan shall include measures to salvage, replant, and monitor the construction zone until native vegetation is re-established under the direction of CDFW and USFWS, as appropriate.	• Include mitigation measure in construction contractor specifications. • Retain copies of the pre-construction survey report in the project file. • Perform site inspections to ensure contractor compliance with construction limits. Retain inspection records in project file. • If applicable, retain salvage and replanting plan in project file. Ensure contractor compliance during site inspections.	PRWA; Construction Contractor	Before and During Construction
BIO-8: Construction crews shall avoid permanently altering streambeds and banks of Little Rock Wash and all features of the wash shall be restored to previous conditions once construction is complete. The PRWA shall consult with CDFW to determine if a Streambed Alteration Agreement is required. Impacts to the streambed of Little Rock Wash shall be mitigated based on measures adopted in the Streambed Alteration Agreement, if required.	• Include mitigation measure in construction contractor specifications. • Perform site inspections to verify contractor compliance with applicable conditions of the Streambed Alteration Agreement.	PRWA; Construction Contractor	During and After Construction
BIO-9: The PRWA shall implement the following measures to protect wildlife movement corridors: • All night lighting shall be directed downward to reduce the effects of light pollution on adjacent areas that may be used by wildlife. • To reduce the attractiveness of the project site for wildlife, water shall not be allowed to pond on the project site; and trash shall be stored in a sealable, wildlife-proof container and removed from the project site each week. • Speed limits on the project site shall be 25 mph.	• Include mitigation measure in construction contractor specifications. • Perform site inspections to ensure contractor compliance.	PRWA; Construction Contractor	During Construction
BIO-10: Efforts shall be made to prevent permanent native vegetation loss to the greatest extent feasible. If removal of Joshua trees is deemed unavoidable, then the operating agencies must take one of the following actions to fulfill obligations under provisions of the City of Palmdale's Joshua Tree and Native Desert Vegetation	• Include mitigation measure in construction contractor specifications. • If applicable, retain copies of the desert vegetation removal permit or exemption in the project file.	PRWA	Before Construction

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Preservation Ordinance (Chapter 14.04 of Title 14 of the Palmdale Municipal Code): 1. Obtain a desert vegetation removal permit from the City of Palmdale's landscape architect or his or her designee. The City currently maintains a minimum preservation standard of two (2) Joshua trees per gross acre, averaged for the gross site area covered by the development application. This standard can also be modified, as determined by the City, to reflect an appropriate preservation ratio as site conditions warrant. The terms, conditions, implementation, and location of these mitigation measures shall be determined through consultation with relevant resource agencies, including the CDFW. 2. Secure an exemption from the provisions of Chapter 14.04 of the Code, under Subsection (F) of 14.04.090, which identifies an exemption as "Removal of street trees from within the public right-of-way, which in the opinion of the director of public works or his or her designee, will or may cause damage to public improvements."	• Prepare report documenting any Joshua tree preservation and implementation of any terms or conditions of the deserve vegetation removal permit, if applicable. Retain copies of report in the project file.		
BIO-11: To comply with Los Angeles County General Plan Open Space and Land Use elements, a Biota report shall be prepared for Phase 5 of the project that is located within SEA No. 49. The report must be prepared by a qualified biologist and submitted to the Los Angeles County Planning Department for review and approval by the Significant Ecological Area Technical Advisory Committee (SEATAC) prior to the initiation of Phase 5 of the project. The Biota report would include an analysis of the project's consistency with SEA Conditional Use Permit compatibility criteria and a mitigation and monitoring plan must be included in the report that identified measures to reduce the project's impacts on SEA No. 49.	• Prepare a Biota report before initiation of Phase 5. • Include mitigation and monitoring plan associated with Biota report in contractor specifications • Perform site inspections to ensure contractor compliance with identified measures.	PRWA	Before and During Construction
Cultural Resources			
CUL-1: Pre-Construction Training. Prior to earthmoving activities, a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (U.S. Department of the Interior, 2008) shall conduct cultural resources sensitivity training for all construction personnel. Construction personnel shall be informed of the types of cultural resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains (see Mitigation Measure CUL-4). PRWA shall ensure that construction personnel are made available for and attend the training and shall retain documentation demonstrating attendance.	• Retain documentation of training in the project file. • Perform site inspections to ensure compliance with cultural sensitivity requirements.	PRWA	Before and During Construction
CUL-2: Inadvertent Archaeological Discoveries. In the event of the discovery of archaeological materials, the construction foreman shall immediately halt all work activities in the vicinity (within approximately 100 feet) of the discovery until it can be evaluated by a qualified archaeologist. After cessation of earthmoving activities, the construction foreman shall immediately contact PRWA. Work shall not resume until authorized by PRWA and the qualified archaeologist.	• Include mitigation measure in construction contractor specifications. • If applicable, retain copies of the Cultural Resources Treatment Plan in the project file. • Perform site inspections to ensure compliance with requirements of the Treatment Plan.	PRWA; Construction Contractor	During Construction

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If the qualified archaeologist determines that the discovery constitutes a significant resource under CEQA, preservation in place is the preferred manner of mitigation. In the event preservation in place is demonstrated to be infeasible, and data recovery is determined to be the only feasible mitigation option, a detailed Cultural Resources Treatment Plan shall be prepared and implemented by a qualified archaeologist in consultation with PRWA. PRWA shall consult with appropriate Native American representatives in determining appropriate treatment for unearthed cultural resources if the resources are prehistoric or Native American in origin. Archaeological materials recovered during any investigation shall be curated at an accredited facility. The report(s) documenting implementation of the Cultural Resources Treatment Plan shall be submitted to PRWA and SCCIC.			
CUL-3: Inadvertent Paleontological Discoveries. In the event fossil materials are exposed during ground disturbing activities, work (within 100 feet of the discovery) shall be halted until a qualified paleontologist meeting the criteria established by the Society for Vertebrate Paleontology is retained to assess the find. If the find is identified as significant, appropriate treatment as determined by the paleontologist shall be implemented prior to the re-commencement of ground disturbance in the area. A report documenting the methods and results of the treatment shall be prepared and submitted to PRWA and filed with the local repository.	• Include mitigation measure in construction contractor specifications. • Retain copies of reports that summarize the evaluation of any paleontological finds in the project file. • Retain copies of reports that document the methods and results applied to significant paleontological finds in the project file.	PRWA	During Construction
CUL-4: Inadvertent Human Remains Discoveries. If human remains are encountered, PRWA shall halt work in the vicinity (within 100 feet) of the find and contact the Los Angeles County Coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are Native American in origin, the Native American Heritage Commission shall be notified, in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code Section 5097.98 (as amended by AB 2641). The Native American Heritage Commission shall designate a Most Likely Descendant for the remains per Public Resources Code Section 5097.98. Until the landowner has conferred with the Most Likely Descendant, PRWA shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.	• Include mitigation measure in construction contractor specifications.	PRWA	During Construction
Geology, Soils, and Seismicity			
GEO-1: Prepare Geologic Report. Prior to approval of construction plans for the project, a design-level geotechnical investigation, including collection of site specific subsurface data shall be completed. The geotechnical investigation shall identify density profiles, approximate maximum shallow groundwater levels, a characterization of the vertical and lateral extent of the saturated sand/silt layers that could undergo liquefaction during strong ground shaking, and development of site-specific design criteria to mitigate potential risks. The investigation also shall identify appropriate engineering	• Retain copies of the geotechnical investigation in the project file. • PRWA shall verify that recommendations have been incorporated into the project design prior to initiation of the project. • Include the geotechnical report as part of the construction documents.	PRWA	Before and During Construction

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considerations, as recommended by a certified engineering geologist or registered geotechnical engineer for planned facilities, including engineering considerations to mitigate the effects of expansive soils if found. Recommendations made as a result of the investigation shall become part of the proposed project	• Perform site inspections to ensure contractor compliance with geotechnical report recommendations.		
GEO-2: Implement a Stormwater Pollution Prevention Plan to Control Erosion. To control water and wind erosion during construction of the project, PRWA shall prepare a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP shall prescribe temporary Best Management Practices (BMPs) to control wind and water erosion during and shortly after construction of the project and permanent BMPs to control erosion and sedimentation once construction is complete. The SWPPP would include soil erosion and sediment control measures that could include, but not be limited to, sediment barriers and traps, silt basins, and silt fences.	• Include mitigation measure in construction contractor specifications. • PRWA shall appoint a construction monitor to verify contractor compliance with SWPPP. • Retain copies of monitoring reports in project files.	PRWA; Construction Contractor	During Construction
Hazards and Hazardous Materials			
HAZ-1: Contingency Plan for Contaminated Soil and/or Groundwater. If contaminated soil and/or groundwater are encountered or suspected during project construction, work shall be halted in the area, and the type and extent of the contamination shall be identified. A contingency plan to dispose of any contaminated soil or groundwater will be developed through consultation with appropriate regulatory agencies. If dewatering or hydrostatic testing of the pipeline is to occur during project construction, the water will be discharged to the local wastewater treatment plant rather than released into any drainage system that would require prior approval from the Lahontan Regional Water Quality Control Board.	• Include mitigation measure in construction contractor specifications. • PRWA shall retain a construction monitor to verify contractor compliance with the contingency plan. • Retain copies of the contingency plan and records verifying implementation of the plan in the project file.	PRWA; Construction Contractor	During Construction
HAZ-2: Hazardous Materials Management and Spill Prevention and Control Plan. Before commencement of construction the PRWA shall require its construction contractor to prepare a Hazardous Materials Management and Spill Prevention and Control Plan that includes a project-specific contingency plan for hazardous materials and waste operations. The Plan shall be applicable to all construction activities, and shall establish policies and procedures according to federal and California Occupational Safety and Health Administration (OSHA) regulations for hazardous materials. Elements of the Plan shall include, but not be limited to, the following: • A discussion of hazardous materials management, including delineation of hazardous material storage areas, access and egress routes, waterways, emergency assembly areas, and temporary hazardous waste storage areas; • Notification and documentation of procedures; and • Spill control and countermeasures, including employee spill prevention/response training.	• Include mitigation measure in construction contractor specifications. • PRWA shall verify that the Plan has been prepared in accordance with HAZ-2. • PRWA shall retain a construction monitor to verify contractor compliance with the Plan. • Retain copies of the Plan and records verifying implementation of the Plan in the project file.	PRWA; Construction Contractor	Before and During Construction

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HAZ-3: Coordination with Airport Agencies. PRWA shall coordinate with appropriate agencies (such as LAWA and FAA) and staff to ensure a safety program is developed and implemented during construction of the proposed project.	• Include mitigation measure in construction contractor specifications. • Retain documentation of coordination with agencies and safety program in project files.	PRWA	Before and During Construction
HAZ-4: Develop and Maintain Emergency Access Strategies. In conjunction with Mitigation Measure TRA-1: Prepare and Implement Traffic Control Plan (see *Section 3.15, Transportation*), PRWA shall require its construction contractor to develop comprehensive strategies for maintaining emergency access. Strategies shall include, but are not limited to, maintaining steel trench plates at the construction sites to restore access across open trenches and identification of alternate routing around construction zones. Also, police, fire, and other emergency service providers shall be notified of the timing, location, and duration of the construction activities and the location of detours and lane closures.	• Include mitigation measure in construction contractor specifications. • PRWA shall verify that the Traffic Control Plan is consistent with applicable emergency response plans and that coordination with appropriate emergency service providers has occurred. • PRWA shall appoint a construction monitor to verify contractor compliance with the Traffic Control Plan. • Retain copies of the Plan and monitoring reports in the project file.	PRWA; Construction Contractor	Before and During Construction
HAZ-5: Prevention of Fire Hazards. During construction, the PRWA shall require that all staging areas, welding areas, or areas slated for development using spark-producing equipment shall be cleared of dried vegetation or other material that could ignite. Any construction equipment that includes a spark arrestor shall be equipped with a spark arrestor in good working order. During the construction of the proposed project, contractors shall require all vehicles and crews working at the project site to have access to functional fire extinguishers at all times. In addition, construction crews shall have a spotter during welding activities to look out for potentially dangerous situations, including accidental sparks.	• Include mitigation measure in construction contractor specifications. • PRWA shall appoint a construction monitor to verify contractor compliance with HAZ-5. • Retain copies of monitoring reports in the project file.	PRWA; Construction Contractor	During Construction
Hydrology and Water Quality			
HYDRO-1: Applicable backflow prevention devices, as outlined in Title 17 shall be incorporated into pipeline design to avoid potential for cross contamination.	• Include mitigation measure in project design guidelines and construction contractor specifications. • Perform site inspections to ensure compliance with HYDRO-1. • Retain copies of any construction inspection reports in the project file.	PRWA; Construction Contractor	Before and During Construction
HYDRO-2: Applicable minimum pipeline separation standards for potable and non-potable water pipelines, as outlined in Title 22, California Code of Regulations, shall be incorporated into pipeline design to avoid potential for cross contamination.	• Include mitigation measure in project design guidelines and construction contractor specifications. • Perform site inspections to ensure compliance with HYDRO-2. • Retain copies of any construction inspection reports in	PRWA; Construction Contractor	Before and During Construction

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	the project file.		
HYDRO-3: All recycled water pipelines shall be painted purple or marked distinctly with purple tape.	• Include mitigation measure in project design specifications. • Perform site inspections to ensure compliance with HYDRO-3. • Retain copies of any construction inspection reports in the project file.	PRWA; Construction Contractor	Before and During Construction
HYDRO-4: Los Angeles County Department of Public Health (DPH), Cross Connection Control Program for Los Angeles County, shall be advised of each new site where recycled water is to be used prior to placing the site into service.	• Include mitigation measure in construction contractor specifications. • PRWA shall notify DPH prior to beginning of service on site.	PRWA	Before Construction
HYDRO-5: All recycled water sites shall be inspected and tested for possible cross connections with the potable water system, in accordance with Sections 60314(3) and 60316(a), Title 22, California Code of Regulations.	• Include mitigation measure in construction contractor specifications.	PRWA	During and After Construction
HYDRO-6: PRWA shall obtain and comply with the requirements of dewatering permits issued by the Lahontan RWQCB for dewatering activities. Provisions of the permit may include treatment of flows prior to discharge.	• Include mitigation measure in project design and construction contractor specifications. • PRWA and construction contractors shall obtain and comply with issued permits. • Retain copies of the permits in the project file. • Perform site inspections to ensure compliance with permit conditions.	PRWA; Construction Contractor	Before and During Construction
HYDRO-7: PRWA shall develop and implement a SWPPP using BMPs to minimize erosion and sedimentation. PRWA shall include in contractor specifications that the contractor is responsible for developing the SWPPP. The SWPPP shall be maintained at the site for the entire duration of construction. The objectives of the SWPPP are to identify pollutant sources that may affect the quality	• Include mitigation measure in construction contractor specifications. • Retain a copy of the SWPPP on site for reference. • Perform site inspections in compliance with the SWPPP to ensure BMPs are properly installed and	PRWA; Construction Contractor	During Construction

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of storm water discharge and to implement BMPs to reduce pollutants in storm water discharges. The SWPPP for the proposed project shall include, but not be limited to, the implementation of the following elements: • Identification of all pollutant sources, including sources of sediment that may affect the quality of storm water discharges associated with construction activity from the construction site; • Identification of non-storm water discharges; • Estimate of the construction area and impervious surface area; • Preparation of a site map and maintenance schedule for BMPs installed during construction designed to reduce or eliminate pollutants after construction is completed (post-construction BMPs); • Identification of all applicable erosion and sedimentation control measures, waste management practices, and spill prevention and control measures; • Maintenance and training practices; and • A sampling and analysis strategy and sampling schedule for discharges from construction activities.	maintained. Retain inspection reports in project file.		
Land Use and Land Use Planning			
LU-1: For the proposed pump station occurring within an Airport Influence Area (AIA), PRWA shall submit their proposed project plans to the Los Angeles County ALUC for review and comment prior to final design.	• PRWA shall submit project plans to the Los Angeles County ALUC for program components within the AIA. • PRWA shall incorporate comments from the ALUC into its final design. • Retain documentation of correspondence with the ALUC in the project file.	PRWA	Before Construction
LU-2: Prior to conducting construction activities within an AIA, PRWA shall prepare an airport construction safety plan that would identify best management practices. The plan would include, at a minimum, construction timeframes and hours, lighting and flagging requirements, air traffic control communication requirements, access and egress restrictions, equipment staging area requirements, and personal safety equipment requirements for construction workers, and appropriate notification to aviators. The plan would be reviewed and approved by airport staff and implemented by both the airport and project construction staff.	• Include mitigation measure in project design specifications and construction contractor specifications. • Perform site inspections to ensure compliance with airport construction safety plan.	PRWA	Before and During Construction
LU-3: Prior to final design of the pump station within an AIA, PRWA shall identify the ground elevation and submit their project plans to airport staff for review and comment. Working with airport staff, PRWA shall submit their design plans for airspace analysis (FAA Part 7460 review) to determine whether any of the proposed project components or proposed construction equipment would protrude into protected airspace. If such objects are identified, PRWA, airport staff, and FAA will identify appropriate steps to adjust project plans or include appropriate markings to identify hazards to aviators	• Include mitigation measure in construction contractor specifications. • PRWA shall submit project plans to airport staff for review and comment, and will incorporate comments into its final design of the pump station. • Retain documentation of correspondence with the	PRWA	Before Construction

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pursuant to FAA Part 7460.	airport staff and FAA in the project file.		
LU-4: To prevent the creation of wildlife attractants, PRWA shall coordinate with construction contractors to ensure that neither project design nor construction plans create temporary or permanent sources of open water, inappropriate seed mixtures, or inappropriate landscaping designs. Notes shall be incorporated on construction plans to warn against the creation of potential wildlife hazards.	• Include mitigation measure in project design specifications and construction contractor specifications. • Perform site inspections to ensure compliance with mitigation measure. Retain copies of inspection reports in project file.	PRWA; Construction Contractor	During Construction
Noise			
NOISE-1: The PRWA shall require its construction contractor to identify and employ noise-reducing construction practices. This provision will be reflected in contract documents. Measures that may be used to limit noise include, but are not limited to: • Require construction contractors to comply with the City of Palmdale and Los Angeles County municipal codes regarding construction hour limitations; • Locate fixed construction equipment and machinery as far as practical from noise sensitive uses; • Use mufflers that are in good working order on all standard equipment; • Select haul routes that affect the fewest number of people; • Use noise-reducing enclosures and/or mufflers around noise-generating equipment; • Where feasible, construct barriers between noise sources and noise-sensitive land uses or take advantage of existing barrier features (terrain, structures) to block sound transmission; and • Enclose construction equipment, where practicable.	• Include mitigation measure in construction contractor specifications. • PRWA shall appoint a construction monitor to verify contractor compliance with noise measures. • Retain copies of monitoring records in the project file.	PRWA; Construction Contractor	During Construction
NOISE-2: The PRWA shall require the construction contractor to notify all residents and businesses within 500 feet of construction areas of the construction schedule in writing a minimum of two weeks prior to ground-breaking. The construction contractor will designate a Noise Complaint Coordinator who will be responsible for responding to complaints regarding construction noise. The Coordinator will determine the cause of any complaint and will ensure that reasonable measures are implemented to correct the problem. A contact telephone number for the Noise Complaint Coordinator will be conspicuously posted on construction site fences or barriers, where possible, and will be included in the written notification of the construction schedule sent to nearby residents. This provision will be reflected in contract documents.	• Include mitigation measure in construction contractor specifications. • PRWA or the construction contractor shall appoint a Noise Complaint Coordinator to respond to construction noise complaints. • Maintain log of complaints filed with the Coordinator and the resolution of each complaint. • Retain copies of the notification and complaint log in the project file.	PRWA; Construction Contractor	Before and During Construction
Traffic and Transportation			
TRA-1: Prepare and Implement a Traffic Control Plan. The PRWA shall require its construction contractor to prepare and implement an effective Traffic Control Plan to	• Include mitigation measure in construction contractor specifications.	PRWA; Construction	Before and During Construction

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FOR THE PALMDALE RECYCLED WATER AUTHORITY RECYCLED WATER FACILITIES PLAN

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
show specific methods for maintaining traffic flows. Examples of traffic control measures to be considered include: 1) Develop circulation and detour plans to minimize impacts to local street circulation, including use of signing and flagging to guide vehicles through and/or around the construction zone. 2) Schedule truck trips, including large-size and oversize truck trips, outside of peak morning (7:00 a.m. to 9:00 a.m.) and evening (4:00 p.m. to 6:00 p.m.) commute hours. 3) Limit lane closures during peak hours to the extent possible. 4) Use haul routes minimizing truck traffic on local roadways to the extent possible. 5) Include accommodations for bicycles and pedestrians in all areas potentially affected by project construction, including detours and signage to maintain connectivity for bikeways and trails. 6) Store construction materials only in designated areas. 7) Coordinate signage for temporarily eliminated on-street parking, with instructions including timing and duration, and nearby areas where parking is currently available. 8) Coordinate with local transit agencies for temporary relocation of routes or bus stops in works zones, as necessary. 9) Develop comprehensive strategies for maintaining emergency flows. Strategies shall include, but are not limited to, maintaining steel trench plates at the construction sites to restore access across open trenches and identification of alternate routing around construction zones. Police, fire, and other emergency service providers shall be notified of the timing, location, and duration of the construction activities and the location of detours and lane closures.	• PRWA or the construction contractor shall prepare and implement a Traffic Control/Traffic Management Plan in accordance with TRA-1. • PRWA shall verify that the Plan has been approved by the applicable local jurisdiction(s). • PWD shall appoint a construction monitor to routinely verify implementation of the approved Plan. • Retain copies of the Plan and monitoring records in the project file.	Contractor	
Mandatory Findings of Significance			
CUM-1: The construction contractor shall consult with appropriate agencies and jurisdictions prior to initiating ground-disturbing activities, to determine if other construction projects will occur coincidentally at the same time and in the vicinity of the proposed project, depending on project schedule and pipeline segment installation. Coordination of construction activities for coincident projects shall occur to ensure impacts to traffic, circulation, access, and noise do not compound to be cumulatively significant. Adjustments to construction schedules and plans, such as traffic control plans, shall be made accordingly as necessary.	• Include mitigation measure in construction contractor specifications. • PRWA shall verify that the project schedule will not conflict with other construction projects in the vicinity. • Retain copies of correspondence and coordination with other agencies and jurisdictions in the project file.	PRWA; Construction Contractor	Before Construction