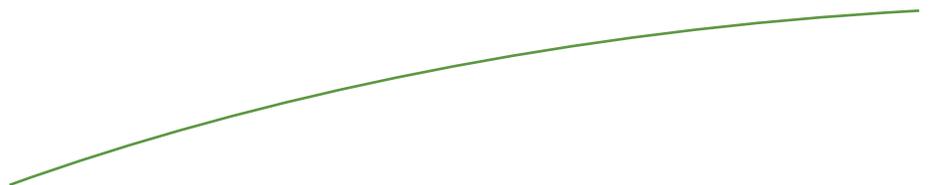




Appendix A

NOTICE OF PREPARATION, SCOPING
COMMENTS, SCOPING MATERIALS



NOTICE OF PREPARATION
PALMDALE WATER DISTRICT
PALMDALE REGIONAL GROUNDWATER RECHARGE AND RECOVERY PROJECT
ENVIRONMENTAL IMPACT REPORT

Date: June 19, 2015

To: Responsible and Trustee Agencies/Interested Organizations and Individuals

Project: **Palmdale Regional Groundwater Recharge and Recovery Project
Environmental Impact Report**

Lead Agency: Palmdale Water District
2029 East Avenue Q, Palmdale, CA 93550
Contact: Matt Knudson, (661) 947-4111, Ext. 1018
mknudson@palmdalewater.org

The Palmdale Water District will be the Lead Agency [per California Environmental Quality Act (CEQA) Guidelines Section 15050 and 15051(b)] and is requiring that an Environmental Impact Report (EIR) be prepared for the project identified below. CEQA Guidelines §15063 provides that if a Lead Agency determines that an EIR will clearly be required for a project, an Initial Study is not required. Review by your agency is requested as to the scope and content of the environmental information relevant to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR prepared by the Palmdale Water District when considering permits that your agency may issue. This Notice of Preparation (NOP) includes a project description, location, and a list of environmental issues to be evaluated in the Draft EIR.

The public review period for this NOP is June 19, 2015 to July 19, 2015. Due to the time limits mandated by State law, your response must be sent as soon as possible, but no later than 30 days after receipt of this notice. A public scoping meeting will be held to solicit comments on the content of the Draft EIR. The meeting will be held on Saturday, July 11, 2015 at 10:00 a.m. at the Palmdale Water District, located at 2029 East Avenue Q in the City of Palmdale. **Please attend the scoping meeting or send your response for this NOP to Matt Knudson, Assistant General Manager, at the Palmdale Water District, at the address shown above. Please include the name, phone number, and address of a contact person in your response.**

PROJECT LOCATION:

The project site is located generally in the northeastern portion of the City of Palmdale (City) in Los Angeles County, California and surrounding unincorporated Los Angeles County (Figure 1). More specifically, the project site is situated north of State Route 138, east of State Route 14, south of Edwards Air Force Base, and west of the community of Lake Los Angeles. The project site is located in portions of the Alpine Butte, Lancaster East, Littlerock, and Palmdale U.S.

Geological Survey (USGS) 7.5-minute quadrangle maps (Figure 2). The project consists of a recharge site and several associated pipelines. The recharge site is located south of East Avenue L, west of 110th Street East, north of Avenue M, and east of 95th Street. The project also includes proposed alignments for raw, potable, and recycled water supply mains that would be located mostly within existing streets (Figure 3). The pipelines are bounded by the recharge site to the north, the California Aqueduct to the south, 106th Street to the east, and 60th Street East to the west (Figure 3).

PROJECT DESCRIPTION:

The Palmdale Water District plans to develop groundwater banking programs with new spreading grounds to recharge imported water and potentially recycled water, as well as recovery facilities to help meet future water demands and improve reliability. The proposed project would deliver raw imported water from the East Branch of the California Aqueduct (State Water Project [SWP] water) to a new recharge basin located in the City of Palmdale. For the magnitude of recharge proposed under the project, SWP water would need to be recharged nearly year round. Recycled water produced locally also may be included in the recharge (compliant with applicable regulations); this source is anticipated to be available at an approximately constant rate year-round. The recharge capacity of the project is projected to be approximately 50,000 to 52,000 acre-feet per year (AF/yr). (An acre-foot is approximately 326,000 gallons.)

The proposed project would occur in phases. The preliminary phase is intended to meet the District's water demands for the first 22 years of the project's life, providing a water supply of 14,125 AF/yr. The second phase is sized to meet the District's water demand through the 50-year project evaluation period (through 2067), as well as ultimate buildout, providing a water supply of up to 24,250 AF/yr. The components of the project, which are each designed to accommodate the ultimate demand of the project, are listed below:

- **State Water Project (SWP) Turnout:** The new 50-cubic foot/second (cfs) turnout would be located at the intersection of the California Aqueduct and 106th Street East. (A turnout at the California Aqueduct is a connection/gate that allows water to leave the Aqueduct). The proposed turnout would connect to the side of the Aqueduct with a 36-inch pipe, and water would flow through the pipeline into an underground vault adjacent to the Aqueduct, before traveling north to the recharge site.
- **Recharge Site:** The recharge site is 160 acres and is defined by East Avenue L to the north, East Avenue L-8 to the south, 100th Street East to the west, and 105th Street East to the east. The basins at the recharge site would consist of four 20-acre cut-and-fill earth embankment recharge basins with either soil cement or shotcrete-lined interior slopes. The basins would occupy approximately 80 acres in the center of the 160-acre recharge site.
- **Raw Water Conveyance:** The SWP/pump back raw water pipeline is approximately nine miles in length and would connect the recharge site with the California Aqueduct at the proposed SWP turnout described above. The 36-inch SWP/pump back raw water pipeline would travel north along 105th Street East from the SWP turnout for approximately 2.3 miles. It would then traverse west along East Avenue S for approximately 0.1 mile, and then north along 105th Street East for approximately 1.5 miles to the terminus of 105th Street East at East Palmdale Boulevard. The SWP/pump back raw water pipeline would continue north from the intersection of 105th Street East and East Palmdale Boulevard, along the future 105th Street East

alignment through undeveloped land for approximately 5.1 miles to connect with the recharge basins at the recharge site.

- **Recycled Water Conveyance:** The recycled water conveyance pipeline includes the construction of a 30-inch recycled water pipeline. The pipeline would connect to an existing 48-inch recycled water pipeline at the intersection of 105th Street East and East Avenue M. The proposed 30-inch pipeline would traverse north for approximately 0.5 mile along 105th Street East, paralleling the 36-inch SWP/ pump back raw water pipeline, until reaching the recharge site.
- **Recovery Wells:** The project would include sixteen recovery wells occurring in two phases, with all wells having a capacity of 1,200 gallons per minute (gpm). The recovery wells are intended to be phased one half at a time with eight wells installed during phase 1 and the additional eight wells installed in phase 2. The recovery wells would be configured in a radial pattern surrounding the recharge site, located on a 1.5-mile by 1.5-mile square, centered around the recharge site. The wells are set back 0.5 mile on each side of the recharge site to provide more than one year of travel time, as required by the California Department of Drinking Water, for recycled water traveling from the recharge basins to the recovery wells. Piping would connect the recovery wells to the pump station. The piping for phase 1 is sized to deliver water from the wells in both phases to the recharge basin and is located either in existing or future street alignments.
- **Distribution Site:** The 1-million-gallon head tank, pump headers, and chlorination building would be located on a 2-acre parcel approximately 0.5 mile south of the recharge basins, at the intersection of Avenue M and 105th Street East.
- **Potable Water Distribution Pump Station:** The distribution system pipeline is intended to accommodate the ultimate demand. However, the pumps themselves are to be phased, meaning the four 3,000 gpm, 400-horsepower pumps (plus one additional pump as a spare) are intended to accommodate the 14,125 AF/yr demand, and the ultimate demand would be supplied through an additional two pumps of the same size and capacity. Although most phasing for the project is intended to be within two parts, this pump station is capable of being implemented through multiple phases as demand increases. The potable water distribution pump station would be located on the same 2-acre parcel as the 1-million-gallon head tank, pump headers, and chlorination building. The project would also include the installation of a 30-inch potable water pipeline that originates at the potable water pump station and proceeds south along the same alignment as the SWP/pump back raw water pipeline and then traverses west along East Palmdale Boulevard, until 60th Street East.
- **Raw Water Pump Station:** The optional raw water pump station is designed to accommodate a water banking partner or partners in order to pump back to the East Branch canal of the California Aqueduct. The raw water pump station would be located adjacent to the distribution system 1-million-gallon head tank and discharge back into the 30-inch diameter SWP/pump back raw water pipeline. It is not required for this pump station to be implemented until a water banking partnership is achieved. The raw water pump station, if constructed in the future, would be located on the same 2-acre parcel containing the 1-million-gallon head tank, pump headers, chlorination building, and potable water distribution pump station. The raw water pump station may be combined with the potable water distribution pump station, resulting in a six pump, 3,750 gpm, 600-horsepower pump station, with one additional pump as a spare.

POTENTIAL ENVIRONMENTAL EFFECTS:

The following is a list of the subject areas that will be analyzed in detail in the EIR:

- Air Quality
- Biological Resources
- Cultural and Paleontological Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology/Water Quality
- Noise

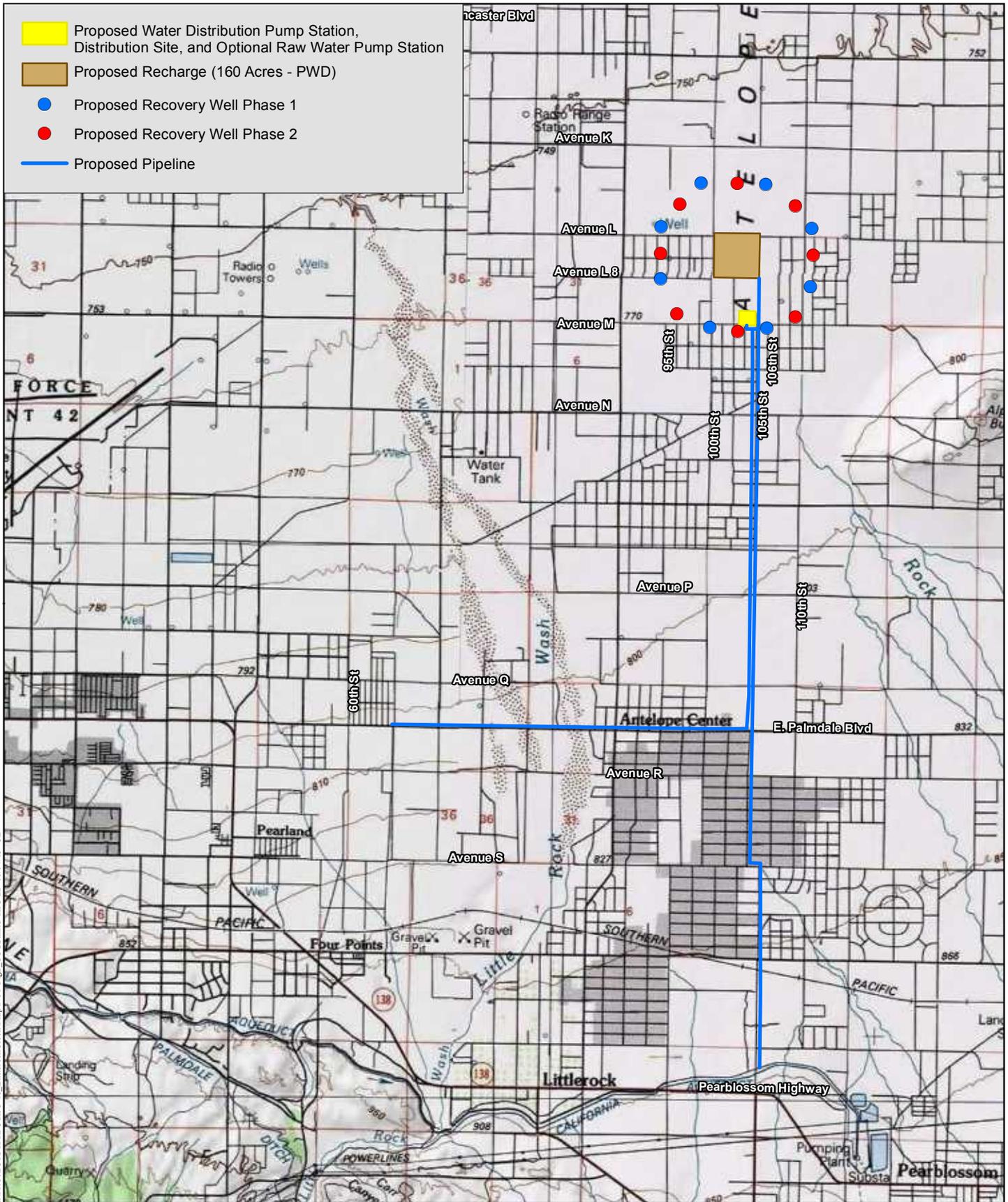
Topics that are expected to be included in the effects found not significant discussion of the EIR are aesthetics/visual quality, agricultural and forestry resources, hazards and hazardous materials, land use and planning, mineral resources, population and housing, public services, recreation, transportation/traffic, and utilities and service systems.

PUBLIC SCOPING MEETING:

Consistent with Section 21083.9 of the CEQA Statutes, a public scoping meeting will be held to solicit comments on the content of the Draft EIR. The meeting will be held on Saturday, July 11, 2015 at 10:00 a.m. at Palmdale Water District, located at 2029 East Avenue Q. Please contact Matt Knudson at the Palmdale Water District for more information.

Attachments:

- Regional Location Map
- Project Vicinity (USGS Topography)
- Aerial Photograph



Project Vicinity (USGS Topography)

PALMDALE REGIONAL GROUNDWATER RECHARGE AND RECOVERY PROJECT



Project Memorandum

DATE: July 7, 2015

TO: Project File, PRGRRP

FROM: Matthew Knudson, Assistant General Manager

SUBJECT: **PALMDALE REGIONAL GROUNDWATER RECHARGE AND RECOVERY PROJECT – NOTICE OF PREPARATION, PUBLIC COMMENTS DURING REVIEW PERIOD**

The Palmdale Regional Groundwater Recharge and Recovery Project (PRGRRP) public review period for the Notice of Preparation (NOP) commenced on June 19, 2015. Palmdale Water District published the CEQA, NOP on June 19, 2015 (SCH#:2015061054) and public comments will be received until July 20, 2015.

SUMMARY OF PUBLIC COMMENTS RECEIVED

The information below summarizes the verbal comments received to date:

1. June 23, 2015 – Mr. Ralph Laster (vacant property owner near 105th Street East and Palmdale Blvd.) called and wanted more detail on the project. I explained the proposed project benefits and encouraged Mr. Laster to attend the scoping meeting scheduled for July 11, 2015. Mr. Laster said he was planning to attend the scoping meeting.
2. June 29, 2015 – Spoke with Mr. Laszlo Kover (vacant property owner near 105th Street East and Avenue M) and Mr. Kover is interested in selling his property. Mr. Kover will not be attending the scoping meeting but wants to receive updates on the status of the project.
3. July 6, 2015 – Received a message from Ms. Tasmin Eusuff, DWR with questions regarding the supply source, timing, and quantity. July 7, 2015 – I left Ms. Eusuff a message clarifying her questions and offered further discussion.
4. July 6, 2015 – Received a message from Scott Harris, California Fish and Wildlife requesting an electronic copy of the NOP in order to save time on re-typing project description as part of their comments. I provided an electronic copy of the NOP via e-mail on July 7, 2015.



Edmund G. Brown Jr.
Governor

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



Ken Alex
Director

Notice of Preparation

June 19, 2015

To: Reviewing Agencies

Re: Palmale Regional Groundwater Recharge and Recovery Project
SCH# 2015061054

Attached for your review and comment is the Notice of Preparation (NOP) for the Palmale Regional Groundwater Recharge and Recovery Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Matthew Knudson
Palmdale Water District
2029 East Avenue Q
Palmdale, CA 93550

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2015061054
Project Title Palmdale Regional Groundwater Recharge and Recovery Project
Lead Agency Palmdale Water District

Type NOP Notice of Preparation
Description The Palmdale Water District plans to develop groundwater banking programs with new spreading grounds to recharge imported water and potentially recycled water, as well as recovery facilities to help meet future water demands and improve reliability. The proposed project would deliver raw imported water from the East Branch of the California Aqueduct (State Water Project [SWP] water) to a new recharge basin located in the City of Palmdale. For the magnitude of recharge proposed under the project, SWP water would need to be recharged nearly year round. Recycled water produced locally also may be included in the recharge (compliant with applicable regulations); this source is anticipated to be available at an approximately constant rate year-round. The recharge capacity of the project is projected to be approximately 50,000 to 52,000 acre-feet per year (AF/yr).

Lead Agency Contact

Name Matthew Knudson
Agency Palmdale Water District
Phone 805 947-4111 x1018 **Fax**
email
Address 2029 East Avenue Q
City Palmdale **State** CA **Zip** 93550

Project Location

County Los Angeles
City Palmdale
Region
Cross Streets various
Lat / Long
Parcel No. various
Township 7N **Range** 10W **Section** 33 **Base** SBB&M

Proximity to:

Highways Hwy 138
Airports Palmdale Regional
Railways SPRR
Waterways Little Rock Wash, Rock Creek, California Aqueduct
Schools Littlerock HS, Gibson ES
Land Use vacant land/Planned Industrial (M-4) / Industrial

Project Issues

Reviewing Agencies Resources Agency; Central Valley Flood Protection Board; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Air Resources Board; State Water Resources Control Board, Division of Financial Assistance; State Water Resources Control Board, Division of Drinking Water; State Water Resources Control Board, Division of Water Rights; Regional Water Quality Control Bd., Region 6 (Victorville)

Date Received 06/19/2015 **Start of Review** 06/19/2015 **End of Review** 07/20/2015

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH 2015061054

Project Title: Palmdale Regional Groundwater Recharge and Recovery Project

Lead Agency: Palmdale Water District Contact Person: Matthew Knudson
 Mailing Address: 2029 East Avenue Q Phone: (661)947-4111, ext. 1018
 City: Palmdale Zip: 93550 County: Los Angeles

Project Location: County: Los Angeles City/Nearest Community: Palmdale

Cross Streets: various, including Avenues L, M; 110th Street, 95th Street, 106th Street, 60th Street Zip Code: 93550

Longitude/Latitude (degrees, minutes and seconds): vario ° us ' _____ " N / vario ° us ' _____ " W Total Acres: 160 +

Assessor's Parcel No.: various Section: 33 Twp.: 7N Range: 10W Base: SBBM

Within 2 Miles: State Hwy #: 138 Waterways: Little Rock Wash, Rock Creek, California Aqueduct

Airports: Palmdale Regional Railways: Southern Pacific Schools: Littlerock HS, Gibson ES

Document Type:

- CEQA: NOP Draft EIR NEPA: NOI Other: Joint Document
 Early Cons Supplement/Subsequent EIR EA Final Document
 Neg Dec (Prior SCH No.) Draft EIS Other: _____
 Mit Neg Dec Other: _____

Local Action Type:

- General Plan Update Specific Plan Rezone Annexation
 General Plan Amendment Master Plan Prezone Redevelopment
 General Plan Element Planned Unit Development Use Permit Coastal Permit
 Community Plan Site Plan Land Division (Subdivision, etc.) Other: recharge project

Development Type:

- Residential: Units _____ Acres _____ Transportation: Type _____
 Office: Sq.ft. _____ Acres _____ Employees _____ Mining: Mineral _____
 Commercial: Sq.ft. _____ Acres _____ Employees _____ Power: Type _____ MW _____
 Industrial: Sq.ft. _____ Acres _____ Employees _____ Waste Treatment: Type _____ MGD _____
 Educational: _____ Hazardous Waste: Type _____
 Recreational: _____ Other: groundwater recharge and recovery
 Water Facilities: Type _____ MGD _____

Project Issues Discussed in Document:

- Aesthetic/Visual Fiscal Recreation/Parks Vegetation
 Agricultural Land Flood Plain/Flooding Schools/Universities Water Quality
 Air Quality Forest Land/Fire Hazard Septic Systems Water Supply/Groundwater
 Archeological/Historical Geologic/Seismic Sewer Capacity Wetland/Riparian
 Biological Resources Minerals Soil Erosion/Compaction/Grading Growth Inducement
 Coastal Zone Noise Solid Waste Land Use
 Drainage/Absorption Population/Housing Balance Toxic/Hazardous Cumulative Effects
 Economic/Jobs Public Services/Facilities Traffic/Circulation Other: _____

Present Land Use/Zoning/General Plan Designation:

vacant land/Planned Industrial (M-4)/Industrial

Project Description: *(please use a separate page if necessary)*

See attached project description

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

NOP Distribution List

AL

County: Los Angeles

SCH# 2015061054

Resources Agency

- Resources Agency
Nadell Gayou
- Dept. of Boating & Waterways
Denise Peterson
- California Coastal Commission
Elizabeth A. Fuchs
- Colorado River Board
Lisa Johansen
- Dept. of Conservation
Elizabeth Carpenter
- California Energy Commission
Eric Knight
- Cal Fire
Dan Foster
- Central Valley Flood Protection Board
James Herota
- Office of Historic Preservation
Ron Parsons
- Dept of Parks & Recreation
Environmental Stewardship Section
- California Department of Resources, Recycling & Recovery
Sue O'Leary
- S.F. Bay Conservation & Dev't. Comm.
Steve McAdam
- Dept. of Water Resources
Resources Agency
Nadell Gayou

Fish and Game

- Depart. of Fish & Wildlife
Scott Flint
Environmental Services Division
- Fish & Wildlife Region 1
Curt Babcock

- Fish & Wildlife Region 1E
Laurie Harnsberger
- Fish & Wildlife Region 2
Jeff Drongesen
- Fish & Wildlife Region 3
Charles Armor
- Fish & Wildlife Region 4
Julie Vance
- Fish & Wildlife Region 5
Leslie Newton-Reed
Habitat Conservation Program
- Fish & Wildlife Region 6
Tiffany Ellis
Habitat Conservation Program
- Fish & Wildlife Region 6 I/M
Heidi Calvert
Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Wildlife M
George Isaac
Marine Region

Other Departments

- Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture
- Depart. of General Services
Public School Construction
- Dept. of General Services
Anna Garbeff
Environmental Services Section
- Delta Stewardship Council
Kevan Samsam
- Housing & Comm. Dev.
CEQA Coordinator
Housing Policy Division

Independent Commissions, Boards

- Delta Protection Commission
Michael Machado

- OES (Office of Emergency Services)
Marcia Scully
- Native American Heritage Comm.
Debbie Treadway
- Public Utilities Commission
Leo Wong
- Santa Monica Bay Restoration
Guangyu Wang
- State Lands Commission
Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Cal State Transportation Agency CalSTA

- Caltrans - Division of Aeronautics
Philip Crimmins
- Caltrans - Planning
HQ LD-IGR
Terri Pencovic
- California Highway Patrol
Suzann Ikeuchi
Office of Special Projects

Dept. of Transportation

- Caltrans, District 1
Rex Jackman
- Caltrans, District 2
Marcelino Gonzalez
- Caltrans, District 3
Eric Federicks - South
Susan Zanchi - North
- Caltrans, District 4
Patricia Maurice
- Caltrans, District 5
Larry Newland
- Caltrans, District 6
Michael Navarro
- Caltrans, District 7
Dianna Watson

- Caltrans, District 8
Mark Roberts
- Caltrans, District 9
Gayle Rosander
- Caltrans, District 10
Tom Dumas
- Caltrans, District 11
Jacob Armstrong
- Caltrans, District 12
Maureen El Harake

Cal EPA

Air Resources Board

- All Other Projects
Cathi Slaminski
- Transportation Projects
Nesamani Kalandiyur
- Industrial/Energy Projects
Mike Tollstrup
- State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance
- State Water Resources Control Board
Jeffery Werth
Division of Drinking Water
- State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality
- State Water Resources Control Board
Phil Crader
Division of Water Rights
- Dept. of Toxic Substances Control
CEQA Tracking Center
- Department of Pesticide Regulation
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- RWQCB 1
Cathleen Hudson
North Coast Region (1)
- RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)
- RWQCB 3
Central Coast Region (3)
- RWQCB 4
Teresa Rodgers
Los Angeles Region (4)
- RWQCB 5S
Central Valley Region (5)
- RWQCB 5F
Central Valley Region (5)
Fresno Branch Office
- RWQCB 5R
Central Valley Region (5)
Redding Branch Office
- RWQCB 6
Lahontan Region (6)
- RWQCB 6V
Lahontan Region (6)
Victorville Branch Office
- RWQCB 7
Colorado River Basin Region (7)
- RWQCB 8
Santa Ana Region (8)
- RWQCB 9
San Diego Region (9)

- Other _____
- _____
- _____
- _____
Conservancy



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



July 20, 2015

Mr. Matt Knudson
Palmdale Water District
2029 East Avenue Q
Palmdale, CA 93550
mknudson@palmdalewater.org

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for Palmdale Regional Groundwater Recharge and Recovery Project, Antelope Valley, Los Angeles County, (SCH# 2015061054)

Dear Mr. Knudson:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) for the Palmdale Regional Groundwater Recharge and Recovery Project Draft Environmental Impact Report (DEIR). The project area is located in the Antelope Valley near Avenue L, M, 110th Street East, 95th Street East, 106th Street East and 60th Street East. The project, as approved, provides for a groundwater banking program that includes the construction of a 160 acre ground water recharge site and supporting infrastructure including several miles of raw and recycled water conveyance pipelines, a State Water Project Turnout at the California Aqueduct, recovery wells, a 2 acre distribution site and two pump stations.

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.

Specific Comments

California Endangered Species Act (CESA). The proposed project may have the potential to effect two CESA listed species, desert tortoise (*Gopherus agassizii*) and Mohave ground squirrel (*Xerospermophilus mohavensis*), and their habitat. The Department considers adverse impacts to a species protected by CESA, for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, candidate species, or state-listed rare plant species that results from the projects prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). 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.

Impacts to Mohave Desert Tortoise – Based upon Google Earth imagery, the Department has concluded that the project site and surrounding area may support habitat for Mohave desert tortoise, a CESA-listed and the Federal Endangered Species Act (FESA) species. The Department recommends U.S. Fish and Wildlife Service protocol surveys be conducted for desert tortoise within appropriate habitat. To mitigate for any unavoidable adverse impacts to desert tortoise to below a level of significance under CEQA, the DEIR should provide a discussion on the presence or absence of desert tortoise and project impacts, avoidance and mitigation measures. To fully mitigate for take of desert tortoise under CESA, further consultation with the Department and CESA incidental take authorization may be required.

Impacts to Mojave Ground Squirrel (*Xerospermophilus mohavensis*) – Based upon Google Earth imagery, the Department has concluded that the proposed Project site and surrounding area may support habitat for the CESA-listed Mojave ground squirrel. The Department recommends that a focused Mojave ground squirrel survey be conducted on the Project site following the Department's 2003 *Trapping and Survey Guideline* (see <https://www.dfg.ca.gov/wildlife/nongame/MGS/>). To mitigate for any unavoidable adverse impacts to Mojave ground squirrel below a level of significance under CEQA, the DEIR should provide a discussion on the presence or absence of Mojave ground squirrel and project impacts, avoidance and mitigation measures. To fully mitigate for take of Mojave ground squirrel under CESA, further consultation with the Department and CESA incidental take authorization may be required.

Special Status Plants – Based upon Google Earth imagery, the Department has concluded that the proposed project site and surrounding area may support habitat for special status plants. Adverse project impacts to special status plants should be considered significant under CEQA. Special status plants include: plants listed under CESA; plants listed as 1A, 1B and 2 of the California Native Plant Society Inventory of Rare and Endangered Vascular Plants of California; and plant species designated as state-listed rare pursuant to the Native Plant Protection Act (NPPA; Fish and Game Code §1900 et seq.). Take of CESA listed, or state-listed rare plants that may occur as a result of the project may only be permitted through an incidental take permit or other authorization issued by the Department.

Specifically the project appears to support habitat for, but not limited to, Alkali mariposa lily (*Calochortus striatus*) a 1B listed plant. To maximize the potential for documenting special status plant species on the project site, and to avoid or mitigate for project impacts to botanical resources below a level of significance, the Department recommends that all botanical surveys follow the *Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (Survey Protocols) see: (http://www.dfg.ca.gov/biogeodata/vegcamp/natural_communities.asp). To mitigate for any unavoidable adverse impacts to special status plant species below a level of significance under CEQA, the DEIR should provide a discussion on the presence or absence of special status plant species and

project impacts, avoidance and mitigation measures such as off site acquisition and protection of occupied habitat. To fully mitigate for take of plants listed under CESA, or state- listed rare plants under NPPA, further consultation with the Department under CESA and NPPA may be required.

In addition, the NPPA prohibits the take¹ of state-listed rare plants unless authorized by the Department or in certain limited circumstances. Take state-listed rare plants that may occur as a result of the Project may only be permitted through an incidental take permit or other authorization issued by the Department pursuant to California Code of Regulations, Title 14, section 786.0 subdivision (b). Please contact the Department early if any NPPA or CESA-listed species are identified within the vicinity of the Project.

Impacts to Burrowing Owl (*Athene cunicularia*) – Based upon Google Earth imagery, the Department has concluded that the proposed project site and surrounding area may support habitat for the burrowing owl, a California Species of Special Concern and recommends avoidance of all habitat for this species on the project site. The DEIR should provide a discussion on the presence or absence of burrowing owl and project impacts, avoidance and mitigation measures. To reduce unavoidable impacts to burrowing owl below a level of significance under CEQA the Department recommends focused surveys, avoidance and mitigation measures following the Department's *2012 Staff Report on Burrowing Owl Mitigation survey guidelines* (Staff Report). The Guidelines may be downloaded from the Department's website: http://www.dfg.ca.gov/wildlife/nongame/survey_monitor.html.

Groundwater Recharge Area Operations – The project proposes operation activities that will result in the discharge of large quantities of water over long periods of time within the 160 acre recharge site which is presently arid. Other maintenance and management operations are also likely to occur within the recharge site. These operations may result in adverse effects to biological resources such as Mojave ground squirrel, desert tortoise, tricolored blackbird (*Agelaius tricolor*) and other nesting birds that are susceptible to changes in soil moisture, ponded water and rapid fluctuations of ponded water depths. Other potential adverse impacts to wildlife associated with the introduction of artificial water sources into arid environments include: the introduction of exotic ants such as Argentine ant (*Linepithema humile*) which compete with native ants and other species for resources; outbreaks of avian botulism which is fatal to waterfowl; and the increase of predators such as common raven (*Corvus corax*) and coyote (*Canis latrans*) which have shown to prey on desert tortoise and other native species. Increases in soil moisture and ponding can also result in the creation of wetland habitat which normally supports a high biological diversity that can benefit wildlife. The DEIR should discuss how the site will be operated to avoid and minimize adverse impacts to wildlife and if management activities that offer beneficial uses for wildlife is feasible such as managing for waterfowl, shorebirds and tricolored blackbird.

¹ Take is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

General Comments

1. Project Description and Alternatives. To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:
 - a) A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas; and,
 - b) A range of feasible alternatives to project component location and design features to ensure that alternatives to the proposed project are fully considered and evaluated. The alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas.
2. 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 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.²
3. Biological Baseline Assessment. To provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats, the DEIR should include the following information:
 - a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]);
 - b) a thorough, recent, floristic-based assessment of special status plants and natural communities, following the Department's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see <http://www.dfg.ca.gov/habcon/plant/>);
 - c) floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the neighboring vicinity. *The Manual of California Vegetation*, second edition, should also be used to inform this mapping and assessment

(Sawyer et al. 2008³). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;

- d) a complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the project. The Department's California Natural Diversity Data Base (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. The Department recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at http://www.dfg.ca.gov/biogeodata/cnddb/submitting_data_to_cnddb.asp ;
 - e) a complete, recent assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511). Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines § 15380). Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service; and,
 - f) a recent, wildlife and rare plant survey. The Department generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame, or in phases.
5. Biological Direct, Indirect, and Cumulative Impacts. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR:
- a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address project-related changes on drainage patterns and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the

² A notification package for a LSA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.

³Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2008. A manual of California Vegetation, 2nd ed.

project site. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included;

- b) a discussion regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;
 - c) the impacts of zoning of areas for development projects or other uses nearby or adjacent to natural areas, which may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document; and,
 - d) a cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
6. Avoidance, Minimization, and Mitigation for Sensitive Plants. The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from project-related direct and indirect impacts. The Department considers these communities 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 CNDDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2008).
7. Compensatory Mitigation. The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
8. Long-Term Management of Mitigation Lands. For proposed preservation and/or restoration, the DEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include, but are not limited to, restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.

9. Nesting Birds. In order to avoid impacts to nesting birds, the DEIR should require that clearing of vegetation and construction occur outside of the peak avian breeding season, which generally runs from February 1st through September 1st (as early as January 1 for some raptors). If project construction is necessary during the bird breeding season, a qualified biologist with experience in conducting bird breeding surveys should conduct weekly bird surveys for nesting birds within three days prior to the work in the area, and ensure that no nesting birds in the project area would be impacted by the project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer should be a minimum width of 300 feet (500 feet for raptors), be delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
10. Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from the project site and permanently moving it to a new location. The Department generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. The Department has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals, and their habitats.
11. Moving out of Harm's Way. The proposed projects anticipated to result in clearing of natural habitats that support many species of indigenous wildlife. To avoid direct mortality, the Department recommends a qualified biological monitor approved by the Department be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or project-related construction activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting project impacts associated with habitat loss.
12. Wildlife Movement and Connectivity. The project area supports significant biological resources and is located adjacent to a regional wildlife movement corridor. The project area contains habitat connections and supports movement across the broader landscape, sustaining both transitory and permanent wildlife populations. Onsite features, which contribute to habitat connectivity, should be evaluated and maintained. Aspects of the project could create physical barriers to wildlife movement from direct or indirect project-related activities. Indirect impacts from lighting, noise, dust, and increased human activity may displace wildlife in the general area.
13. Revegetation/Restoration Plan. Plans for restoration and re-vegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and

assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

- a) The Department recommends that local onsite propagules from the project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in the near future in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various project components as appropriate.
- b) Restoration objectives should include providing special habitat elements where feasible to benefit key wildlife species. These physical and biological features can include, for example, retention of woody material, logs, snags, rocks and brush piles (see Mayer and Laudenslayer, 1988², for a more detailed discussion of special habitat elements).

We appreciate the opportunity to comment on the referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to Scott Harris at (626-797-3170) or email at: scott.p.harris@wildlife.ca.gov.

Sincerely,



Betty J. Courtney
Environmental Program Manager I
South Coast Region

ec: Ms. Erinn Wilson, CDFW, Los Alamitos
Ms. Kelly Schmoker, Laguna Niguel
Ms. Victoria Chau, CDFW, Los Alamitos
Ms. Sarah Rains, CDFW, Thousand Oaks
Mr. Scott Morgan, State Clearinghouse, Sacramento

⁴Mayer, K. E. and W. F. Laudenslayer, Jr. 1988. Editors: A guide to wildlife habitats of California. State of California, The Resources Agency, Department of Forestry and Fire Protection, Sacramento, CA.



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

July 17, 2015

Matt Knudson
Assistant General Manager
Palmdale Water District
2029 East Avenue Q
Palmdale, CA 93550

Dear Mr. Knudson:

Comments on the Notice of Preparation – Palmdale Regional Groundwater Recharge and Recovery Project Environmental Impact Report

Sanitation District Nos. 14 and 20 of Los Angeles County (District Nos. 14 and 20) appreciate the opportunity to comment on the Palmdale Water District's (PWD) Notice of Preparation (NOP) for the Palmdale Regional Groundwater Recharge and Recovery Project (Project). We understand that the proposed Project would utilize recycled water from the Palmdale Water Reclamation Plant (PWRP) operated by District No. 20 in addition to water obtained from the State Water Project. It is also our understanding that portions of the proposed Project are located in the area where District No. 20 has been obtaining property to use for effluent management of the recycled water produced by the PWRP.

District No. 20 prepared the PWRP 2025 Facilities Plan and Environmental Impact Report¹ (2025 Plan) in September 2005. One of the objectives of the 2025 Plan was to provide effluent management capacity adequate to meet the needs of District No. 20 through the year 2025. Agricultural reuse, combined with storage reservoirs, was identified as the preferred effluent management alternative. Property located generally between Avenue K-8 to the north, Avenue M to the south, 70th Street East to the west, and 150th Street East to the east was identified as the proposed site for agricultural activities and the storage reservoirs. Since approval of the 2025 Plan, District No. 20 has completed an upgrade of the PWRP, has been actively acquiring property in this area, and has constructed the first phase of storage reservoirs.

District Nos. 14 and 20 are generally supportive of the proposed Project for reasons described in the 2025 Plan. The proposed Project would beneficially use recycled water to augment the water supply. District Nos. 14 and 20 are currently working on the development of a sales agreement with the Palmdale Recycled Water Authority, of which you are a member.

The following comments are provided based on the information supplied in the NOP:

1. The NOP identifies a portion of the proposed Project site which overlaps with District No. 20's planned agricultural reuse site as identified in the 2025 Plan. In particular, Figure 2 of the NOP depicts the "Groundwater Recharge," "Proposed Recovery Wells," and "Proposed Pump Stations" areas on land already or slated for acquisition by District No. 20. In addition, irrigation with recycled water is not permitted within 50 feet of domestic water supply wells. The 2025

¹Go to: <http://www.lacsd.org/wastewater/wwpubreports/lancasterpalmdale/palmdale2025/default.asp> to access this document.

Plan indicates that District No. 20 will need to acquire 5,140 acres of land for agricultural reuse phased over time according to need. District No. 20 has already acquired more than 1,000 acres of land in the vicinity, including about 50 acres within the area identified as "Groundwater Recharge" and about 60 acres identified near the proposed locations of the "Proposed Recovery Wells" and "Proposed Pump Stations" in the NOP. The implementation of the proposed Project and other alternative reuse opportunities may reduce District No. 20's need for this property. District No. 20 is willing to consider PWD's use of land owned by District No. 20 for the proposed Project, depending on the size and timing of other local reuse projects that will be implemented within the next several years, and potential legal restrictions on the use of the property.

2. District No. 20 intends to use the property surrounding the proposed recharge site and recovery wells for agriculture employing the use of pivot irrigation. Therefore, the location of the proposed facilities should be evaluated to minimize impinging on the ability of District No. 20 to utilize the surrounding property for this purpose.
3. The amount of recycled water available to PWD for recharge will be limited based on the quantity of water produced by the PWRP. Additionally, a contract will be needed to define how, how much, when, and where water will be allocated from the PWRP to the proposed Project.
4. The NOP assumes that recycled water will be available to the proposed Project at a constant rate year round. Unfortunately, recycled water may not be available to the proposed Project at all times during the year. The demand for the recycled water varies daily and seasonally, with the highest demand during summer while the production of recycled water at the PWRP is relatively constant. This requires storage of recycled water in the reservoirs during the winter and drawdown from the reservoirs in the summer. Therefore, the proposed Project should include scenarios where use of recycled water is maximized during winter months.
5. It is anticipated that PWD would be required to obtain a permit from the Regional Water Quality Control Board, Lahontan Region (LRWQCB), and approval from the State Water Resources Control Board for the use of recycled water for the proposed Project. LRWQCB may require that District No. 20 be a co-permittee, based on our experience with similar projects.
6. The quality of the recycled water made available to the proposed Project by District No. 20 would depend on whether the water comes from the PWRP or the storage reservoirs. The recycled water produced by the PWRP meets all disinfected tertiary recycled water quality requirements detailed in Title 22 of the California Code of Regulations. Water in the open storage reservoirs is eutrophic and has come into contact with water fowl and other potential environmental contaminants. The stored water is currently screened as it is withdrawn from the storage reservoirs to remove clumps of algae, feathers, and other debris that could clog irrigation nozzles. The proposed Project should evaluate whether existing water quality from the two sources will be adequate for the intended groundwater recharge use.
7. The pipeline between the PWRP and the storage reservoirs was not designed to support the proposed Project. District No. 20 must operate this pipeline for effluent management needs. Therefore, the recycled water conveyance portion of the proposed Project will need to evaluate modifications or additional facilities (including pump stations, controls, storage, etc.) needed to distribute adequate quantities of water to the proposed recharge site.

Since the size and timing of the proposed Project are crucial to District No. 20's recycled water management strategies as noted in Comment Nos. 1 and 4, the proposed Project's scope and schedule should be regularly discussed between our agencies, as contingencies may need to be considered. A partnership agreement between PWD and District No. 20 should be considered to manage permitting issues and to ensure the overall success of the proposed Project.

We look forward to working with PWD on completion of the proposed Project. If you have any questions regarding the above comments, please contact me at (562) 908-4288, extension 2716.

Very truly yours,

Grace Robinson Hyde



Christopher R. Salomon
Supervising Engineer
Planning Section

MJJ:el



SOUTHERN CALIFORNIA
ASSOCIATION of
GOVERNMENTS

Main Office

818 West Seventh Street
12th Floor
Los Angeles, California
90017-3435
t (213) 236-1800
f (213) 236-1825
www.scag.ca.gov

Officers

President
Cheryl Viegas-Walker, El Centro

First Vice President
Michele Martinez, Santa Ana

Second Vice President
Margaret Finlay, Duarte

Immediate Past President
Carl Morehouse, San Buenaventura

**Executive/Administration
Committee Chair**

Cheryl Viegas-Walker, El Centro

Policy Committee Chairs

Community, Economic and
Human Development
Bill Jahn, Big Bear

Energy & Environment
Deborah Robertson, Rialto

Transportation
Alan Wapner, San Bernardino
Associated Governments

July 19, 2015

Mr. Matt Knudson
Palmdale Water District
2029 East Avenue Q
Palmdale, California 93550
Phone: (661) 947-4111 x1018
Email: mknudson@palmdalewater.org

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Palmdale Regional Groundwater Recharge and Recovery Project [SCAG NO. IGR8513]

Dear Mr. Knudson,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Palmdale Regional Groundwater Recharge and Recovery Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Palmdale Regional Groundwater Recharge and Recovery Project. The proposed project includes development of groundwater banking programs with new spreading grounds to recharge imported water and potentially recycled water, as well as recovery facilities to help meet future water demands and improve reliability. The proposed project would occur in phases; the preliminary phase is intended to meet the District's water demands for 22 years and the second phase is sized to meet demands through 2067 (50-year project evaluation period).

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to sunl@scag.ca.gov providing, at a minimum, the full public comment period for review. If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Lijin Sun, Esq., Senior Regional Planner, at (213) 236-1882 or sunl@scag.ca.gov. Thank you.

Sincerely,

A handwritten signature in black ink that reads 'Ping Chang'.

Ping Chang
Program Manager II, Land Use and Environmental Planning

¹ SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR
THE PALMDALE REGIONAL GROUNDWATER RECHARGE AND RECOVERY PROJECT
[SCAG NO. IGR8513]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS.

2012 RTP/SCS GOALS

The SCAG Regional Council adopted the 2012 RTP/SCS in April 2012. The 2012 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see <http://rtpscs.scag.ca.gov>). The goals included in the 2012 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2012 RTP/SCS are the following:

SCAG 2012 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and non-motorized transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format. Suggested format is as follows:

SCAG 2012 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference
etc.	etc.

RTP/SCS STRATEGIES

To achieve the goals of the 2012 RTP/SCS, a wide range of strategies are included in SCS Chapter (starting on page 152) of the RTP/SCS focusing on four key areas: 1) Land Use Actions and Strategies; 2) Transportation Network Actions and Strategies; 3) Transportation Demand Management (TDM) Actions and Strategies and; 4) Transportation System Management (TSM) Actions and Strategies. If applicable to the proposed project, please refer to these strategies as guidance for considering the proposed project within the context of regional goals and policies. To access a listing of the strategies, please visit <http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf> (Tables 4.3 – 4.7, beginning on page 152).

REGIONAL GROWTH FORECASTS

At the time of this letter, the most recently adopted SCAG forecasts consists of the 2020 and 2035 RTP/SCS population, household and employment forecasts. To view them, please visit <http://scag.ca.gov/Documents/2012AdoptedGrowthForecastPDF.pdf>. The forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts		Adopted City of Palmdale Forecasts	
	Year 2020	Year 2035	Year 2020	Year 2035
Population	19,663,000	22,091,000	179,300	206,100
Households	6,458,000	7,325,000	51,300	58,800
Employment	8,414,000	9,441,000	38,900	47,200

MITIGATION

SCAG staff recommends that you review the SCAG 2012 RTP/SCS Final Program EIR Mitigation Measures for guidance, as appropriate. See Chapter 6 (beginning on page 143) at: <http://rtpscs.scag.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf>

As referenced in Chapter 6, a comprehensive list of example mitigation measures that may be considered as appropriate is included in Appendix G: *Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects*. Appendix G can be accessed at: http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf

DEPARTMENT OF WATER RESOURCES

1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791



July 20, 2015

Matthew Knudson
Assistant General Manager
Palmdale Water District
2029 East Avenue Q
Palmdale, California 93550

Notice of Preparation of an Environmental Impact Report, Palmdale Regional Groundwater Recharge and Recovery Project, South of City of Palmdale, Los Angeles County, Near Milepost 358.75, Southern Field Division, SCH2015061054

Dear Mr. Knudson:

Thank you for the opportunity to review and comment on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Palmdale Regional Groundwater Recharge and Recovery Project (Project) in the city of Palmdale and the unincorporated area of Los Angeles County. The NOP describes the proposed Project of Palmdale Water District (Applicant) to develop groundwater banking programs to help meet future demands and improve reliability. The Project includes construction of a new 50-cubic foot per second turnout from the California Aqueduct (Aqueduct) and a 36 inch diameter pipeline that would convey water to the 160-acre groundwater recharge site in the city of Palmdale. Also included is an optional raw water pump station that would be located near the recharge site and would be designed to accommodate the Applicant's water banking partners in order to pump water back to the Aqueduct.

The Department of Water Resources (DWR) has the following comments about the Project:

1. As work will take place within DWR right-of-way, a DWR Encroachment Permit shall be required in addition to a Turnout Agreement. DWR shall adopt the California Environmental Quality Act (CEQA) EIR Findings as a Responsible Agency prior granting the permit and may include additional conditions which the Applicant would be responsible for implementing. Information regarding regulations and forms for submitting an application for an encroachment permit to DWR can be found at:

http://www.water.ca.gov/regulations/docs/Encroachment_Permit_Regulations_text.pdf

2. Pump back of raw water from the Palmdale Groundwater Recharge and Recovery Project into the East Branch of the California Aqueduct is proposed (Page 3, Raw Water Pump Station). Before water from this program can be pumped into the Aqueduct, approval by DWR would be needed through a Turnout Agreement and in accordance with DWR's Non-Project Pump-in Policy (Department of Water Resources Water Quality Policy and Implementation Process for Acceptance of Non-Project Water into the State Water Project, October 2012). Submittal of a pump-in proposal is required describing the program including: terms and conditions of inflow timing, rates and volumes of inflow; potential impacts and/or benefits to downstream SWP water contractors; detailed water quality data for all sources of water; anticipated water quality changes within the SWP, and other pertinent information. As part of the proposal, all participating wells shall be required to submit analytical results for Title 22 drinking water chemicals every three years to DWR for review.

3. In order to satisfy the environmental requirements for a turnout agreement, sufficient detail shall be provided in the project description on the turnout to be constructed. If specific details of the impacts are not presented for the turnout portion of the project, additional CEQA analysis may be required. Detail required includes, but is not limited to: footprint of the turnout construction area, location, equipment usage, staging areas, details on the turnout itself, existing habitat and species, mitigation, monitoring and reporting plan. Also, impacts to State Water Project operations as a result of the proposed project shall be evaluated.

Please provide DWR with a copy of any subsequent environmental documentation when it becomes available for public review. Any future correspondence relating to this proposed project shall be sent to:

Leroy Ellinghouse, Chief
SWP Encroachments Section
Division of Operations and Maintenance
Department of Water Resources
1416 Ninth Street, Room 641-2
Sacramento, California 95814

Matthew Knudson
July 20, 2015
Page 3

If you have any questions, please contact Leroy Ellinghouse, Chief of the SWP Encroachments Section, at (916) 659-7168 or Jonathan Canuela at (916) 653-5095.

Sincerely,

David M. Samson, Chief
State Water Project Operations Support Office
Division of Operations and Maintenance

cc: State Clearinghouse
Office of Planning and Research
1400 Tenth Street, Room 121
Sacramento, California 95814

From: [JASON ZINK](#)
To: robtealvarado@aol.com; [Dennis LaMoreaux](#)
Cc: [Mike McNutt](#); [Matthew Knudson](#); [P Fred Thompson](#); [P R Martinez](#); [Norm Hickling](#); [p Steve Hofbauer](#); [P Ken Pulskamp](#); [p Mike Dispenza](#); [p Jim Ledford](#); jmann@mojavepartners.net; [AVBOT](#); [Frank Donato](#); dflory@avek.org; [AV Press](#); wwert@lacs.org
Subject: FW: will inquire: Bus Tour for PWD request
Date: Tuesday, July 14, 2015 9:07:03 AM

Dennis Lamoreaux & Robert Alvarado

I made an inquire regarding setting up a field trip for you if the Water Board and staff and yourselves are interested and your consultant. You told me you had never been out there to see Piute Ponds the sewer plant, and eastside holding pound. Wendy Wert is the PR person. I think this tour would be very beneficial to PWD and City Council and Planning Commissioners. You could tour your proposed recharge project too and my suggestion of moving it to Littlerock Creek where the AV community would get recreational opportunities. After this tour and seeing the Piute Ponds(Unbelievable that this beautiful place is in AV you will feel your in another place) you will get my **point!!!!** of why??? would we send all this opportunity out to a spot that jackrabbits and lizard only enjoy. "Humans" should benefit from this project and turn Palmdale & Littlerock into a play ground with a live running creek, trails, fishing holes, camp sites and off road ding motor cycle opportunities. The state and county has money for this as you know they where looking at a site on MT Emma Road, but I don't think it will fly, so we will request those funds for this project. Also LA County will be putting on a new Park property tax on the 2016 November Ballot that always passes with voter approval by wide margins. And Barbra Boxer has her water bill in the Senate, we could get Knight and McCarthy to get a line item to pay for it in the bill or another one, and we have the State Water Bond Funds too.

I remember as a kid camping and boating in the gravel pits, and even watching a guy water ski in one. So why not make it happen with a plan to take over the dug out pits fill them up and make a couple of lakes. This has been a dream of mine to see this happen so people can enjoy what I enjoyed as a kid growing up here.

It's cheaper then piping water to your proposed site, ground recharging is better, better spot to create electricity for a Hydro turbine pressure(to pump water bake to city, cheap land, creates recreation, happy times in AV no reason to go out of the area to the beach. Happy citizens, and something that you can be very proud to be apart of, that future generation will enjoy.

You will be amazed at how much water just sits out in the desert that needs to be used in the city to make AV more beautiful and enjoyable.

After this tour I promise you will really enjoy calling AV home and will be really excited about it's future.

Sincerely,

Jason Zink

(661) 810-9931

zinkjason@hotmail.com

From: wwert@lacsds.org

To: zinkjason@hotmail.com; SHighter@lacsds.org

CC: NMadigan@lacsds.org; PBurgos@lacsds.org; RCaulkins@lacsds.org

Subject: will inquire: Bus Tour for PWD request

Date: Tue, 14 Jul 2015 14:05:29 +0000

Good to hear from you Jason! We always enjoy welcoming folks to our facilities. That said, we'll need to explore resources available to accommodate this request. Alas, we are currently at the end of our budgetary fiscal year so funding is limited. Please let us know your target dates and we will see if this could be viable or perhaps combined with another outreach event. Thank you for your interest in the Sanitation Districts.

Kind Regards, Wendy

WENDY WERT, P.E., BCEE | Environmental Engineer | Public Information Office | o.562.908.4288 x2308 | c.626.840.0039
SANITATION DISTRICTS OF LOS ANGELES COUNTY | 1955 Workman Mill Road, Whittier, CA 90601
Converting Waste Into Resources | www.LACSD.org

From: JASON ZINK [<mailto:zinkjason@hotmail.com>]

Sent: Monday, July 13, 2015 4:34 PM

To: Highter, Steve; Wert, Wendy

Cc: Norm Hickling

Subject: Bus Tour for PWD request

Hi Wendy and Steve,

I meet with Palmdale Water District during a community input meeting regarding the Palmdale Regional Groundwater Recharge and Recovery Project.

Can you set up a Bus tour of the Palmdale and Lancaster Plant and a drive out to see Palmdale and Lancaster Farming and storage Ponds and Puite Ponds. They have never seen the Ponds and they said they would be interested to see it. I think it would benefit them as our local leaders to see it to know the water system and the unbelievable beautiful Puite Ponds at the base (AV Greatest Secret). See if you can arrange a tour for them and ask the environmental people that went to Puite Ponds with us to explain the eco system out there. I would love to go on the tour again and bring my mother to. see the Puite Ponds. There are some new city council member's on Palmdale City Council (Thompson & Martinez) now that I think would love to see it. It blow me away. So we would need a big bus for sure. Maybe also invite Littlerock, Sun village and Lake LA Town Councils too as a good jester. The more leaders that know the better the public will benefit.

Maybe Norm Hickling can help arrange it.

Let me know if you can arrange it, Sincerely,

Jason Zink

(661) 810-9931

zinkjason@hotmail.com

From: wwert@lacs.org

To: zinkjason@hotmail.com

Subject: agree: AV Sewer Plant Tours

Date: Thu, 21 May 2015 23:19:25 +0000

Wonderful to hear from you Jason. I too was inspired by our AV tours. I have forwarded your letter to our leadership and I hope we will be able to consider your excellent suggestions. I'll keep you posted ☺ Kind Regards, Wendy

There are some pictures from the tour on our Facebook page at:

<https://www.facebook.com/SanitationDistrictsLACounty> If you can't find us search from your Facebook page using these exact words: Sanitation Districts of Los Angeles County

From: JASON ZINK [<mailto:zinkjason@hotmail.com>]

Sent: Thursday, May 21, 2015 2:52 PM

To: Wert, Wendy

Cc: Norm Hickling; p Jim Ledford; p Mike Dispenza; P Fred Thompson; P David Childs; P R Martinez; L R Rex Parris; L Marvin Crist; L Kenn Mann; L Ron Smith; L Bozigian, Mark; L Jason Caudle

Subject: AV Sewer Plant Tours

Wendy Wert

Sanitation District Los Angeles County

Project Engineer

Public Information Office

626-840-0039

Hello again Wendy, it's Jason Zink I sat behind you on the bus ride to the Piute Ponds. I Had a lot of fun seeing what's out there and how it all work's and I appreciate the County doing this tour for the community. I wanted to email you and have you forward this to your follow workers an idea I had about placing Art Decorative Wind Turbines at the Lancaster Treatment Plant along the 14 Freeway. Maybe your team can apply for a Grant like Palmdale Water District PWD did for their water treatment plant at Lake Palmdale to make the plant almost net-zero and saving tax payers money with future electrical rates going higher and higher every year and the wind blowing all the time we should be capturing the energy and also place solar panels where feasible, I would of loved to see locally manufactured panels and turbines installed.

I will also be asking the City of Lancaster and County about teaming up to provide funding for the Piute Ponds by repaving a new road over the rough narrow washboard road, and new signage and other improvements to accommodate bus tours. Perhaps from left over bond money or state bond funds, hopefully opening it up to even more community groups and citizens and schools so they can appreciate this "Water Jewel in the Desert". I know Councilmen Ken Mann said they still need to use some bond funds to replace the 40 year old pumps at Lancaster which I saw, and perhaps the county should look at the cost of covers for the plant to reduce the sewer smell there in Lancaster which smells twice as bad as the Palmdale Plant most likely because it treats more sewer. One of the county representatives said it was feasible to cover they just cost a lot, let's find out.

Again thank everyone for me, you guys made it a really fun experience for everyone even though it was all day long 9am-4:30 pm I learned a lot about the working's and management of both plants. And hopefully we can create even more recreational beauty opportunities for reusing the recycled water though-out AV. I believe what I took away from this is what I have always believed, that we locally could do so much more if we had our own local AV Community Service District C.S.D. and had the County as a partner for it's expertise and purchasing power.

Look forward to taking family and friends to go see Piute Ponds in the future, Sincerely,

Jason Zink

(661) 810-9931

zinkjason@hotmail.com

<http://www.piuteponds.com/index.php>

CONFIDENTIALITY NOTICE: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

From: [JASON ZINK](#)
To: [Matthew Knudson](#)
Subject: FW: AV Press article today Water
Date: Saturday, July 11, 2015 6:40:33 PM

put 1 to many d on your email Matt

Jason Zink

(661) 810-9931

zinkjason@hotmail.com

From: zinkjason@hotmail.com
To: dlamoreaux@palmdalewater.org; mknuddson@palmdalewater.org;
mmcnutt@palmdalewater.org; robertearlvarado@aol.com
CC: frank@never-quit.com; dflory@avek.org; brentb@qhwd.org; creed@qhwd.org;
dmeraz@qhwd.org
Subject: FW: AV Press article today Water
Date: Sat, 11 Jul 2015 18:34:46 -0700

It was nice to meet all of you at PWD to go over and discuss the public meeting regarding the Palmdale Regional Ground Water Recharge and Recovery Project. Here is that article I told you about.

AV may not have to follow the order because they did not hold a legal hearing. And other district stood up and did not follow the order. We should of been in this category of water boards. Especially when LA County put off the order for a week we missed a perfect timing to raise up and protest the 32-36% order over the governors 25%. It's not fair to AV who has paid so much for the sewer plant and recycling system. It's a Hardship on us.

If I'm right about this stop fining customers ASAP. If I'm wrong still do it. Let the AV public know your going to fight for them. Let them re order the order and start from new date. Lets stand up to the state and have some Balls this time.

Let all AV water providers sign joint protest letter and have order reduced to just 25%. Not the 32%-36% that the Water Resource Board ordered or we will sue them. Get RESPECT! Like AV Hospital is suing the county over the Trauma Tax to get respect and get AV fair share.

Rent a jet and fly up there from Fox Field to the Capital and attend the boards next meeting, hopefully this time all our state reps will get out of their chairs and walk to the hearing with you. I will never understand why our reps did not show up and fight and represent us.

AV needs balls we never had them before hopefully on this issue they will finally fall. Lobby for emergency grant money for grass -toilets-recycle pipe line-etc....from the governor and create some local jobs. People are still hurting out there in AV.

Sorry about using the word Balls but it seems like only Donald Trump has them now a days and I don't know any other word that's better that AV need's in 2015 in dealing with the State and County.

Good Luck Men.

Sincerely,

Jason Zink

(661) 810-9931

zinkjason@hotmail.com

Sent on my Samsung Galaxy S® 5

CONFIDENTIALITY NOTICE: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.



PALMDALE REGIONAL GROUNDWATER RECHARGE AND RECOVERY PROJECT

COMMENT FORM

Thank you for attending the open house for the Palmdale Regional Groundwater Recharge and Recovery Project. If you have comments regarding the scope and content of the Draft Environmental Impact Report, please provide them below and return this form to the comment box at the conclusion of the open house.

Comments must be postmarked or received via email no later than Monday, July 20, 2015, to be considered in the Draft Environmental Impact Report. Comments may be submitted at the scoping meeting, emailed or postmarked and sent to the corresponding addresses provided below.

**** PLEASE PRINT CLEARLY ****

I do not believe this is the best Project
For Water Recharging. #1 reason the cost
cost of Pipping that far out to Prec Ponds +
the returning pipe to the city. Energy cost
to pump water would cost consumers more for
water. Need's to achivie "Net-zero" status.
Does not benifit citizen's in recreational
oportunities. None what so ever. Enviornmental
Project needs alternative project's. Need
to Pubish Metting Press Realse AV Press,
The AV Times, CHAMBERS OF COMMERCE. NOTIFY Littlerock
Time Warner

Your Name JASON ZINK (661) 810-9931
Address 37629 Lilacview Ave
City / State / Zip Code Palmdale, CA 93550
Email zinkjason@hotmail.com
Sunvillage community's
Flyer and announce ment @

To submit written comments:

Via U.S. mail:
Matt Knudson
Assistant General Manager
Palmdale Water District
2029 E. Ave. Q
Palmdale, CA 93550

Via email: mknudson@palmdalewater.org

Palmdale City Council Meeting.
TURN OVER FOR MY
ALTERNATIVE PROJECT
↙

ALTERNATIVE

Project should be placed in Littlerock creek
a natural percolation system the biggest
in A.V.. No need for piping saves money.
Use Hydro Turbin to create Energy from
release of Aqueduct into Littlerock creek.

Have Quarry Plan that works with the
quarrys and take them over once they
abandon them.

Create Biggest Recreational Park Land
in Antelope Valley. Hicking, Horse Back,
Bycyle trails. Boating, swimming, fishing.

Have a ~~OHV~~ OHV AREA for moto cycle
riding down the creek from Rail Road
to Palmdale Blvd and Past to Ave Q.

This ~~is~~ ALternative would create so
many benefits compared to the proposal.

It would reduce High Nitrates in Littlerock
Ground Water Area, (which Entitles project to Hardship Grant)
(Team up with L.C.I.D.) FUNDS!

NET-zero Project Grants

Recreation Grant State, County, Fed.

Like Supulvida Project, Santa Fe Dam
Recreation Area

Make
it a
corps
of Engineers
Project.