VENICE PUMPING PLANT
DUAL FORCE MAIN PROJECT

FINAL ENVIRONMENTAL IMPACT REPORT

STATE CLEARINGHOUSE NUMBER: 2003031001

VOLUME II

City of Los Angeles
Bureau of Engineering
Department of Public Works
1149 South Broadway, Suite 600
Los Angeles, California 90015

Contact: Mr. Jim Doty; (213) 485-5759

December 2007

URS

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Santa Ana, California 92705
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EXECUTIVE SUMMARY
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EXECUTIVE SUMMARY

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1.0 INTRODUCTION

1.1 PURPOSE OF THE EIR

An EIR is an informational document which will inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effect and describe reasonable alternatives to the project. This EIR evaluates the environmental impacts which could occur if the City of Los Angeles constructs and operates a new two-mile long, 54-inch diameter force main sewer pipeline from the existing Venice Pumping Plant (VPP) in the community of Venice to a junction structure on the Coastal Interceptor Sewer in the community of Playa Del Rey on Vista Del Mar near Waterview Street (the proposed Project). The new force main would supplement the existing 48-inch force main between the two locations. From the Coastal Interceptor Sewer, effluent would be carried through an existing line to the Hyperion Treatment Plant. The EIR provides mitigation measures to avoid or reduce the severity of the identified significant impacts. It considers alternatives to the project which could reduce environmental impacts while meeting the project objectives. The no project alternative is evaluated and the environmentally superior alternative is identified.

This Executive Summary briefly summarizes the Final EIR and describes areas of controversy and issues to be resolved by the decisionmakers including the choice among the project alternatives.

1.2 LEAD AGENCY AND DOCUMENT FORMAT

The City of Los Angeles is the lead agency for the EIR and has supervised its preparation. The City of Los Angeles City Council has primary responsibility for the certification of the Final EIR and adoption and implementation of the proposed Project.

This EIR is organized into four volumes:

- Volume I. Draft Environmental Impact Report
- Volume II. Final Environmental Impact Report
- Appendices Part One: A through E
- Appendices Part Two: D through I

The EIR contains all of the components required by the CEQA Guidelines. These requirements and their location in the EIR are listed in Table 1.2-1. During the course of the EIR preparation, the City of Los Angeles’ Department of Public Works consulted with affected agencies and organizations. Responses to the City’s Notice of Preparation (NOP) are provided in Appendix A in the Draft EIR. Within the 45-day public review and comment period on the Draft EIR, the City conducted one public comment meeting.
City of Los Angeles

Executive Summary: Venice Pumping Plant Dual Force Main Project Final EIR

(see Appendix J). Agency and public comments on the Draft EIR and the City’s written responses to these comments are provided in the Final EIR, Section 11, Responses to Comments.

### Table 1.2-1. Required Contents of an EIR – CEQA Guidelines

<table>
<thead>
<tr>
<th>Required Analysis (CEQA Guidelines Section Number)</th>
<th>In Draft EIR</th>
</tr>
</thead>
<tbody>
<tr>
<td>Table of Contents (Section 15122)</td>
<td>TOC</td>
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<tr>
<td>Summary (Section 15123)</td>
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<td>Project Description (Section 15124)</td>
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<td>Environmental Setting (Section 15125)</td>
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<td>Environmental Impacts (Section 15126)</td>
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<td>Significant Environmental Effects of Proposed Project [Section 15126.2(a)]</td>
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<td>Mitigation Measures Proposed to Minimize Significant Effects [Section 15126.4]</td>
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<tr>
<td>Alternatives to the Proposed Project [Section 15126.6]</td>
<td>4 and 6</td>
</tr>
<tr>
<td>Significant Irreversible Environmental Changes Resulting From Implementation of the Proposed Project [Section 15126.2(c)]</td>
<td>5</td>
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<tr>
<td>Growth Inducing Impacts of the Proposed Project [Section 15126.2(g)]</td>
<td>7</td>
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<tr>
<td>Effects Found Not to Be Significant (Section 15128)</td>
<td>5</td>
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<tr>
<td>References, Persons Contacted and Preparers of the Draft EIR (Section 15129)</td>
<td>9 and 10</td>
</tr>
<tr>
<td>Cumulative Impacts (Section 15130)</td>
<td>5 and 7</td>
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<thead>
<tr>
<th>Required Analysis (CEQA Guidelines Section Number)</th>
<th>In Final EIR</th>
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</thead>
<tbody>
<tr>
<td>Comments and Recommendations on Draft EIR [Section 15132(b)]</td>
<td>11</td>
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<tr>
<td>List of persons, organizations, and public agencies commenting on the draft EIR [Section 15132(c)]</td>
<td>11</td>
</tr>
<tr>
<td>Lead Agency Responses to significant environmental points raised in the review and consultation process. [Section 15132(d)]</td>
<td>11</td>
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</table>

Technical studies were prepared to provide substantial evidence to support this EIR and are provided in the appendices to the Draft EIR. Appendix D, Biological Resources is reprinted in full in the Final EIR. Other technical reports and studies providing substantial evidence in support of the EIR and its appendices are listed in the Draft EIR, Section 10.0: References and Persons Contacted, and are available for public review at the City of Los Angeles’ Bureau of Engineering, Department of Public Works at 1149 South Broadway, Los Angeles, 90015-2237.

### 1.3 Focus of the EIR

This is a “project” level EIR\(^3\) for the construction and operation of the proposed new force main sewer. The EIR is focused on the expected environmental effects that may occur with the approval of and the subsequent implementation of the proposed force main sewer project: air quality, biological resources, circulation, traffic and transportation, cultural resources, geology, soils and seismicity, hazardous waste and materials, hydrology, water quality/stormwater runoff, land use plans, noise and vibration, public facilities and services, and visual and aesthetic resources. These issues were identified in the Initial Study prepared by the City of Los Angeles (included in Appendix A to the Draft EIR) and reconfirmed after considering the comments received on the Draft EIR. Fiscal issues and impacts are not addressed in the EIR as such analysis is not required by CEQA.

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\(^3\) Section 15180 of the CEQA Guidelines
1.4 INTENDED USE OF THE EIR

The City of Los Angeles City Council, as Lead Agency under CEQA, will consider the Final EIR and must certify it prior to considering approval of the Venice Force Main Sewer Project. Other state, regional, and local agencies will also use the Final EIR prior to their consideration of any subsequent discretionary approvals (see Section 1.6 below).

1.5 REVIEWING AGENCIES

The following agencies will review this Project:

- Los Angeles County (various departments);
- California Coastal Commission (CCC);
- California Department of Fish and Game (CDFG);
- Department of Conservation;
- Department of Parks and Recreation;
- Native American Heritage Commission;
- State Lands Commission;
- California Department of Transportation (Caltrans), District 7;
- National Marine Fisheries Service;
- United States Fish and Wildlife Service (USFWS);
- Regional Water Quality Control Board (RWQCB), Region 4;
- South Coast Air Quality Management District (SCAQMD);
- United States Army Corps of Engineers (USACOE); and
- Others as determined.

1.6 PERMITS AND APPROVAL REQUIREMENTS

Table 1.6-1 identifies the names of agencies responsible for review and approval of the proposed Project and the permits required. Others not listed may also apply:

<table>
<thead>
<tr>
<th>Agency</th>
<th>Permit/Requirement</th>
<th>Issues of Concern</th>
</tr>
</thead>
<tbody>
<tr>
<td>Los Angeles County</td>
<td>• Geotechnical/Grading/Hauling Permits</td>
<td>• Impacts from dewatering, tunneling</td>
</tr>
<tr>
<td></td>
<td>• Dept. of Beaches and Harbors; Right-of-Entry Permit</td>
<td>• Staging areas and additional easement</td>
</tr>
<tr>
<td></td>
<td>• Right-of-Way (ROW)/Easements for construction and future maintenance and operations</td>
<td></td>
</tr>
</tbody>
</table>
### Related Projects

This EIR evaluates the cumulative impacts of the proposed Project. "Cumulative impacts" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts\(^4\). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts\(^5\). Table 1.7-1 provides a list of related projects in the City and County of Los Angeles within an approximate 2-mile radius of the project site at the time of the Notice of Preparation of the EIR. The list includes 15 projects of various land uses, including residential, retail, general commercial, and mixed uses.

#### Table 1.7-1. Related Projects

<table>
<thead>
<tr>
<th>Project No.</th>
<th>Jurisdiction</th>
<th>Location</th>
<th>Type of Project</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>County of Los Angeles</td>
<td>Bora Bora Way</td>
<td>120 D.U.s; Net decrease of 271 slips; Demolish 4 KSF offices</td>
<td>10/18/2000 (approval date)</td>
</tr>
</tbody>
</table>

\(^4\) CEQA Guidelines Section 15355  
\(^5\) CEQA Guidelines Section 15130(b)(1)(A).
## 1.8 Areas of Public Concern or Known Controversy

A community meeting was held on May 31, 2005, at the Westchester Community Center, to discuss the scope of the Draft EIR. The scoping meeting participants were introduced to the EIR process and the proposed Project and were invited to provide information and comments regarding potential impacts to the environment resulting from construction of the proposed Project (see Appendix J, Public Participation). During the preparation of the Draft EIR, the City of Los Angeles considered the comments received in response to the Notice of Preparation and during the public meeting. The Draft EIR was released for a 45-day public review period on February 1, 2006 and a public comment meeting was conducted on February 23, 2006. The public comment period closed on March 17, 2006. Substantive comments received on the Draft EIR along with written responses are provided in the Final EIR, Section 11, Responses to Comments.

The primary issues and areas of concern identified by the public regarding the proposed Project, which are addressed in the EIR, are:

### Table: Project Information

<table>
<thead>
<tr>
<th>Project No.</th>
<th>Jurisdiction</th>
<th>Location</th>
<th>Type of Project</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>County of Los Angeles</td>
<td>Tahiti Way</td>
<td>Remodel existing apartments (no increase in D.U.s)</td>
<td>10/18/2000 (approval date)</td>
</tr>
<tr>
<td>3</td>
<td>County of Los Angeles</td>
<td>Marquesas Way</td>
<td>Net increase of 282 D.U.s; 354 senior apartments; Net decrease of 3.6 KSF retail; Net decrease of 237 slips</td>
<td>12/6/2000 (approval date)</td>
</tr>
<tr>
<td>4</td>
<td>County of Los Angeles</td>
<td>Panay Way</td>
<td>68 D.U.s; 60 Congregate Care units</td>
<td>6/13/1996 (approval date)</td>
</tr>
<tr>
<td>5</td>
<td>County of Los Angeles</td>
<td>Panay Way</td>
<td>Net increase of 250 D.U.s; 47 senior apartments; Net decrease of 41 slips; Demolish 4.4 KSF restaurant</td>
<td>12/6/2000 (approval date)</td>
</tr>
<tr>
<td>6</td>
<td>County of Los Angeles</td>
<td>Panay Way</td>
<td>99 D.U.s; Net increase of 4.94 KSF Yacht Club; 2.3 KSF Office; Transfer of 97 D.U.s from DZ1 to DZ4</td>
<td>10/2/2000 (approval date)</td>
</tr>
<tr>
<td>7</td>
<td>County of Los Angeles</td>
<td>Palawan Way/ Beach Ave</td>
<td>450 s.f. net retail increase</td>
<td>6/25/2003 (approval date)</td>
</tr>
<tr>
<td>8</td>
<td>County of Los Angeles</td>
<td>Palawan Way/ Beach Ave</td>
<td>Net increase of 115 D.U.s</td>
<td>12/10/2003 (approval date)</td>
</tr>
<tr>
<td>9</td>
<td>County of Los Angeles</td>
<td>Admiralty Way</td>
<td>Library expansion – 2,454 S.F.</td>
<td>3/5/1997 (approval date)</td>
</tr>
<tr>
<td>10</td>
<td>County of Los Angeles</td>
<td>Mindanao Way</td>
<td>4.7 KSF retail increase</td>
<td>To Be Announced (TBA)</td>
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<tr>
<td>11</td>
<td>County of Los Angeles</td>
<td>Via Marina</td>
<td>11.4 KSF net retail increase, 288 restaurant seats, 1.3 KSF reduction in office</td>
<td>6/16/2004 (approval date)</td>
</tr>
<tr>
<td>12</td>
<td>County of Los Angeles</td>
<td>Marina Del Rey Tide Gates</td>
<td>Tide Gate Rehabilitation</td>
<td>11/2007 (permits pending)</td>
</tr>
<tr>
<td>13</td>
<td>County of Los Angeles</td>
<td>Hotel at Via Marina</td>
<td>TBA</td>
<td>TBA</td>
</tr>
<tr>
<td>14</td>
<td>City of Los Angeles</td>
<td>Grand Canal</td>
<td>Gates at Washington Street</td>
<td>TBA</td>
</tr>
<tr>
<td>15</td>
<td>City of Los Angeles</td>
<td>Grand Canal</td>
<td>Between Driftwood Street and Hurricane Street Temporary VPP bypass pipeline for sluice gate replacement in VPP</td>
<td>11/2007 (permits pending)</td>
</tr>
</tbody>
</table>

Sources: City of Los Angeles Planning Department; County of Los Angeles Department of Regional Planning, Bureau of Engineering and Los Angeles County Department of Public Works.
- Noise impacts during project construction;
- Limited on-street parking availability during construction;
- Aesthetic and visual impacts during construction;
- Air quality impacts during construction;
- Possible impacts to the Least Tern and other wildlife during and after construction;
- Potential impacts to recreational facilities and public events on the beachfront;
- Staging and operation of construction equipment on existing bike paths, walking trails and bridges;
- Impacts to water quality in both the Marina Del Rey Channel and Ballona Creek Channel;
- Impacts to traffic circulation and emergency access during construction;
- Impacts to residential access to and from housing during construction; and
- Impacts to structural foundations resulting from construction-related activities.

1.9 EIR PARTICIPANTS AND PUBLIC REVIEW

This EIR has been prepared in conformance with the local and state CEQA Guidelines, as amended. URS Corporation provided environmental consultation services to the City for the EIR. The City of Los Angeles proposed responses to agency comments on the Draft EIR are being provided to public agencies and private organizations prior to City of Los Angeles consideration of certification of the Final EIR and project approval.

The City of Los Angeles circulated an NOP for this EIR to responsible agencies on May 2, 2005, to solicit comments on issues relevant to their agency or jurisdiction, and for subsequent consideration of the proposed Project. The City considered all comments received during the scoping period in the preparation of the Draft EIR. The Notice of Availability of the Draft EIR was issued on February 1, 2006 [see Final EIR Appendix J, Public Outreach]. The Draft EIR was made available for a 45-day public review period ending on March 17, 2006. The document was made available to the public at the City of Los Angeles Bureau of Engineering, Environmental Management Division and at the City of Los Angeles Central Library, Venice Branch Library, Westchester Library, and Playa Vista Public Library. The City conducted one public community meeting on the Draft EIR February 23, 2006 at the Westchester Municipal Building in Westchester, CA. The City provided written responses to all comments received on the Draft EIR in the Final EIR (see Final EIR, Section 11.0, Responses to Comments).

1.10 PROJECT LOCATION

The proposed project is in the City of Los Angeles in the communities of Venice and Playa Del Rey (see Figure ES-1, Regional Project Location Map). The City of Los Angeles is proposing to construct and operate a new force main sewer extending from the existing Venice Pumping Plant at 140 Hurricane Street and the westerly bank of the Grand Canal and the northerly bank of the Ballona Lagoon in the community of Venice, and extends southerly under both the Grand Canal and Ballona Creek, to a junction
City of Los Angeles

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The Venice Pumping Plant's existing 48-inch-diameter force main sewer, built in 1958, is a force main (pressurized pipeline) that conveys sewage wastewater flows from the Venice Pumping Plant to the Hyperion Sewage Treatment Plant (see Figure ES-2). Currently, the existing force main sewer can handle only about 60 percent of the flows that could otherwise run through the Venice Pumping Plant when all of its five pumps are running at full capacity. When flows into the Venice Pumping Plant exceed flows out from the plant, wastewater could overflow directly into the Ballona Lagoon. During heavy storms, such as those that occurred during the winters of 1994-95 and 2004-05, the excess sewage wastewater at the plant came within minutes of overflowing into the Ballona Lagoon.
The project’s intent is to construct a second force main sewer (54-inch diameter) to be used in tandem with the existing force main sewer. The City’s three key project objectives include 1) Sewage Conveyance Capacity, 2) Pipeline Redundancy, and 3) Ability to Perform Maintenance. These are summarized below.

**Sewage Conveyance Capacity**

The Venice Pumping Plant is the largest pumping plant in the City of Los Angeles. It collects sewage from the coastal areas of the City through an existing 48-inch pipeline and transports it to the Hyperion Treatment Plant in Playa Del Rey (see Figure ES-2). Over the years, the existing pipeline has gradually approached maximum capacity placing substantial strain on the system forcing the water level in the wet-well of the Venice Pumping Plant basement to rise.

The City of Los Angeles first identified the need for additional sewer capacity during the heavy storms of 1995 when sewage and infiltrated stormwater in the sewage system exceeded the capacity of the existing 48-inch line, creating a potentially serious human and environmental health risk. Although the pumping plant had all five pumps running during peak rainfall, the existing downstream sewer force main that runs along the beach could only handle approximately 60 percent of the flows that would otherwise run through the pumps – the pipeline was serving as a bottleneck in the system. The amount of sewage and infiltrated stormwater in the sewage system exceeded its capacity, forcing the water level in the wet-well of the Venice Pumping Plant to rise. In an effort to prevent potential sewage spillage as a result of an overload situation, the City proposes to install an additional 54-inch pipeline to convey the sewage and infiltrated stormwater flows. The new force main would be used in tandem with the existing force main; together, the two force mains would provide the necessary capacity to meet current and future peak wet weather flow demands.

**Pipeline Redundancy**

The new force main would provide force main redundancy in the case where either one of the pipelines was taken out of service for any reason. This redundancy is not provided by the current single force main pipeline. The installation of the proposed 54-inch force main bypass capability would also allow repair and maintenance of the existing pipeline as described below.

**Ability to Perform Maintenance**

The existing 48-inch pipeline was built in 1958 and has been in continuous operation since then. Development of the new 53-inch would allow the first opportunity for rehabilitation of the existing force main and future reciprocal cleaning of each force main during dry weather periods. One of the two force mains would be taken out of service for maintenance while the second force main would continue to convey sewage wastewater to the Hyperion Treatment Plant.
2.0 PROPOSED PROJECT AND ALTERNATIVES

The Initial Study for the proposed Project determined that the Project would not result in significant effects to the environment during the operations phase of the project. Temporary significant impacts resulting from the Project would be directly related to construction activities. This EIR considers a range of reasonable alternatives that would meet the project objectives and would also avoid or substantially reduce the significant effects of the proposed Project.

The EIR considers four (4) route alignment alternatives, and three (3) alterative construction methods in order to balance their ability to meet the project objectives and avoid or substantially reduce the significant environmental impacts of the proposed Project. The No Project Alternative is also evaluated in the EIR.

2.1 ROUTE ALIGNMENT ALTERNATIVES

The EIR considers three primary alternative pipeline route alignments between the Venice Pumping Plant and the Coastal Interceptor Sewer in the community of Playa Del Rey (see Figure ES-2, Alignment Alternatives):

- Via Marina / Pacific Avenue
- Pacific Avenue
- Dockweiler Beach

Via Marina/Pacific Avenue
From the existing Venice Pumping Plant on Hurricane Street, the alignment would proceed east under the Grand Canal and along Marquesas Way, then southeasterly on Via Marina to the Marina Del Rey entrance channel. The route crosses the channel to Pacific Avenue. From there, the alignment continues south along Pacific Avenue to Vista Del Mar to the Coastal Intercept Sewer junction connection near Waterview Street. This alignment is about 10,400 feet long.

Pacific Avenue Alignment
From the pumping plant on Hurricane Street, the alignment would proceed westerly to Pacific Avenue, then turn southeast and proceed along Pacific Avenue, cross under the Marina Del Rey and Ballona Creek channels, and continue southeast within Pacific Avenue and Vista Del Mar to the junction structure under Vista Del Mar near Waterview Street.

Dockweiler Beach Alignment
From the pumping plant on Hurricane Street, the alignment would proceed westerly to the existing 20-foot wide sewer easement in Venice Municipal Beach and Dockweiler State Beach, then turn southeast and cross under the Marina Del Rey and Ballona Creek channels, and continue south along the Dockweiler Beachfront to a point west of the junction structure in Vista Del Mar near Waterview Street. From this point, the line runs easterly to the junction structure under Vista Del Mar near Waterview.
Street. If the mined large-diameter tunnel construction method is used, the construction shaft and staging area could be on the Los Angeles Airport property (LAX) slightly further to the southeast.
CHANNEL CROSSING
As noted above each of the alignments under consideration crosses the Marina entrance channel and Ballona Creek and would require approximately 1,800 feet of tunneling under the two channels.

SHAFTS AND LAYDOWN AREAS
Boring and tunneling operations and pipeline staging and laydown areas would also be required. Boring shaft locations along the three alternative routes (that is, locations where construction equipment would be used on the surface and visible during the construction of the particular alignment) may be located at any of the numbered locations shown on Figure ES-2).

2.2 CONSTRUCTION METHODS
The City’s project objectives can be achieved by using one or more of three construction methods considered in this EIR. These are:

(1) Cut-and-cover,

(2) Small-Diameter Micro-tunneling (“Boring”), and

(3) Large-diameter (“Mined”) tunneling.
Each method could provide both benefits and issues of concern for the project. A combination of construction methods could be used for each of the alternative routes described in Section 2.1 above. The construction methods are described below.

2.2.1 Cut-and-Cover Construction

Cut-and-cover construction is a very common method of linear pipeline construction (see Figure ES-3, Cut-and-Cover Construction Method). The contractor would not work in all areas of the pipeline corridor at the same time, but would open relatively short segments of the corridor (about 1,000 feet), install the pipeline, and proceed with back-filling, finishing and restoring the segments. Underground utilities that conflict with the surface trenched construction would be temporarily relocated as necessary. With this approach, major construction activities could be limited to within the relatively short corridor segments. During the preparation of this EIR, the cut-and-cover method of construction was considered and determined to be not viable for the Dockweiler Beach Alignment because the method would result in a relatively shallow sewer, which could be vulnerable to damage from future coastal erosion processes.

2.2.2 Small-Diameter Micro-Tunneling (Boring)

Boring is a trenchless construction method, which uses hydraulic jacks located in surface pits to drive pipes through the ground behind a remotely operated Tunnel Boring Machine (TBM) (see Figure ES-4,
Small-Diameter Micro-Tunneling (Boring) Method. Drive lengths are generally limited to about 1,000 feet, depending upon ground conditions and pipe size; but intermediate jacking stations can be used to extend the drive length. Unlike conventional cut-and-cover trenching techniques that require excavation for the entire length of pipeline as described in Section 2.2.1 above, excavation for micro-tunneling is limited to the endpoints of each drive within designated launching (jacking) and receiving pits. The launching pit contains the hydraulic jacks used to push the pipes, and the receiving pit is used to recover the TBM at the end of each drive. Tunneling can proceed intermittently; although, it is often necessary to proceed continuously, particularly on long drives through sticky soils, to prevent the pipe from getting stuck short of the receiving pit. Tunnel advance rates are typically between 30 and 50 feet per 8-hour work shift, depending on soil conditions and pipe size.

2.2.3 Large-Diameter (Mined) Tunneling

In contrast to small-diameter micro-tunnels, which are constructed by remote-controlled TBMs and pipe-jacking, large-diameter tunnels (i.e., minimum excavated diameter = 10 to 12 feet) can be constructed with staffed TBMs (see Figure ES-5, Large Diameter (Mined) Tunnel Method). In addition to the difference in tunnel diameter, the most important difference between these larger TBMs and the micro-tunneling machines discussed in Section 2.2.2 above is that the concrete tunnel liner is erected in segments immediately behind the TBM. This type of tunnel liner does not need to be continuously pushed (jacked) forward, and there is no length limitation due to frictional resistance building up with increasing tunnel length. For tunneling below the groundwater level without the need for dewatering, pressurized-face TBMs are used to stabilize the tunnel face and prevent the water from entering the TBM.
3.0 ENVIRONMENTAL IMPACT ANALYSIS

As stated above, the Initial Study for the proposed project concluded that there would be no significant environmental impacts during the operations phase of the project. All potential significant impacts would be associated with the construction phase of the project. The summary environmental impact analysis below addresses the alternative route alignments and alternative construction methods. The environmental effects of the No Project Alternative are summarized. The Environmentally Superior Alternative is also identified.

3.1 SUMMARY OF PROJECT ALTERNATIVES

The potential project alternatives analyzed in the EIR are briefly described in Sections 3.1.1 and 3.1.2 below. The summary of the comparative environmental analysis follows Section 3.2 below.

3.1.1 New Force Main Sewer Line Alternatives

A new force main would provide redundancy to the existing sewer, allowing for adequate conveyance from the Venice Pumping Plant to the Hyperion Treatment Plant in Playa Del Rey, and would provide the ability to periodically shut-down and conduct maintenance on the existing 48-inch force main.

- **Micro-tunneling** could be used along the Dockweiler Beach alignment, Via Marina/ Pacific Avenue alignment and the Pacific Avenue Alignment (see Figure ES-2 Alignment Alternatives).

- The **cut-and-cover/micro-tunneling** method of construction may be used for the Via Marina/ Pacific Avenue alignment and the Pacific Avenue Alignment. Each cut-and-cover alignment also involves micro-tunneling under the Marina Del Rey Channel and includes shafts on either side of the channel for the purpose entering and/or exiting the tunnel as required to install the sewer pipe under the channel. Note that cut-and-cover construction was considered for the beachfront alignment initially, but deemed to be not viable because the method would result in a relatively shallow sewer, which could be vulnerable to damage from future coastal erosion processes.

- The **Large-diameter tunneling** method could be used for the Dockweiler Beach alignments. Under this alignment option, the large tunnel could terminate either on the beach west of the Waterview Street Junction Structure or at Los Angeles Airport (see Figure ES-2). From these large tunnel termination points, cut-and-cover or boring would be used to tie-in to the junction structure.

Table 3.1, Project Alternative Impact Areas, lists the project areas (streets) subject to environmental impact during project construction. The numbers in the table refer to the associated shaft locations for tunneling construction along each route depicted on Figure ES-2, Alignment Alternatives.
### Table 3.1-1. Project Alternative Impact Areas

<table>
<thead>
<tr>
<th>Cut and Cover Alternatives</th>
<th>Impact Areas/ Associated Shaft Locations</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Via Marina/ Pacific Avenue</td>
<td>Marquesas Way, Via Marina Way, Pacific Ave., Vista del Mar, and Sites 10, 11, 12, 8, 4, 3</td>
</tr>
<tr>
<td>• Pacific Avenue</td>
<td>Hurricane Street, Pacific Ave, Vista del Mar, and Sites 10, 7, 4, 3</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Micro Tunnel Alternatives</th>
<th>Impact Areas/ Associated Shaft Locations</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Dockweiler Beach Alignment</td>
<td>Sites 10, 9, 6, 5, 3</td>
</tr>
<tr>
<td>• Via Marina/ Pacific Avenue</td>
<td>Sites 10, 11, 12, 8, 4, 3</td>
</tr>
<tr>
<td>• Pacific Avenue</td>
<td>Sites 10, 7, 4, 3</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Large Diameter Alternatives</th>
<th>Impact Areas/ Associated Shaft Locations</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Beach Alignment</td>
<td>Sites 10, 2, and Beach Alignment</td>
</tr>
<tr>
<td>• Beach Alignment (with cut and cover ends)</td>
<td>Hurricane Street, Site 9, Beach Alignment, Site 1</td>
</tr>
<tr>
<td>• Inland Alignment</td>
<td>Sites 10, 2, and Inland Alignment</td>
</tr>
</tbody>
</table>

The EIR provides sufficient analysis of the project alternatives to determine which of the alternatives would meet the City’s objectives while substantially avoiding or reducing significant environmental impacts. The Lead Agency is not required to select the environmentally superior alternative identified in this EIR but must provide findings of fact explaining its decision not to select this alternative.

#### 3.1.2 No Project Alternative

Under this alternative, no new sewer force main would be constructed and the existing sewer system would continue to operate in its current configuration.

The No Project alternative could result in potentially significant adverse effects to the environment due to the lack of conveyance capacity of the existing 48-inch sewer force main downstream of the Venice Pumping Plant and the current inability to perform regularly scheduled maintenance on this pipeline. If inflows to the Venice Pumping Plant exceed the capacity of the force main leaving the plant, an overflow of untreated wastewater into the Ballona Lagoon and other areas in the vicinity of the Venice Pumping Plant Force Main corridor could result, causing significant harm to the environment.

### 3.2 SUMMARY ENVIRONMENTAL IMPACT ANALYSIS

#### 3.2.1 Comparative Impact Analysis

The environmental impacts of each alternative project configuration are summarized in Table 3.3-1. The alternatives are listed in the row along the top of the table. The first column on the left hand side of the table identifies each impact category. A text summary of each alternative’s environmental impacts follows the table.
### Table 3.3-1. Environmental Impacts Summary Table

<table>
<thead>
<tr>
<th>Impact</th>
<th>Cut-and-Cover</th>
<th>Small-Diameter Micro-Tunneling (Boring)</th>
<th>Large-Diameter Tunneling (Mined)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Pacific</td>
<td>Via Marina</td>
<td>Beach</td>
</tr>
<tr>
<td>Air Quality</td>
<td>Significant Short-term</td>
<td>Significant Short-term</td>
<td>Not Significant</td>
</tr>
<tr>
<td>Biological Resources</td>
<td>Secondary impact if construction causes turbidity</td>
<td>Secondary impact if construction causes turbidity</td>
<td>Secondary impact if construction causes turbidity</td>
</tr>
<tr>
<td>Parking</td>
<td>Temporary loss of 55 parking spaces</td>
<td>Temporary loss of 52 parking spaces</td>
<td>Temporary loss of 55 parking spaces</td>
</tr>
<tr>
<td>Cultural Resources</td>
<td>Not Significant with mitigation</td>
<td>Not Significant with mitigation</td>
<td>None</td>
</tr>
<tr>
<td>Geology, Soils</td>
<td>Not Significant with mitigation</td>
<td>Not Significant with mitigation</td>
<td>Not Significant with mitigation</td>
</tr>
<tr>
<td>Seismicity/liquefaction</td>
<td>Significant</td>
<td>Significant</td>
<td>Significant</td>
</tr>
<tr>
<td>Subsidence</td>
<td>Risk from dewatering</td>
<td>Risk from dewatering</td>
<td>If dewatering</td>
</tr>
<tr>
<td>Nearby Oil/Gas Wells</td>
<td>14 wells</td>
<td>12 wells</td>
<td>41 wells</td>
</tr>
<tr>
<td>Nearby contamination</td>
<td>5 sites</td>
<td>2 sites</td>
<td>2 sites</td>
</tr>
<tr>
<td>Hydrology, Water Quality / Stormwater Runoff</td>
<td>Dewatering Required</td>
<td>Dewatering Required</td>
<td>Dewatering not required</td>
</tr>
<tr>
<td>Land Use Plans</td>
<td>no effect</td>
<td>no effect</td>
<td>no effect</td>
</tr>
<tr>
<td>Noise And Vibration Disturbance Factor</td>
<td>120</td>
<td>82</td>
<td>21</td>
</tr>
<tr>
<td>Public Facilities &amp; Services</td>
<td>Temporary impacts to: Ballona Creek &amp; Dockweiler Beach Bike Path, Del Rey Lagoon Park parking, Napoleon Street footpath</td>
<td>Temporary impacts to: Esplanade East access, parking at Marquessas Way and Via Marina, Via Marina scenic highway, Aubrey E. Austin Park, Marina Channel viewpoint, Parking, Ballona Creek &amp; Dockweiler Beach Bike Path,</td>
<td>Temporary impacts to: Beach access &amp; use, Napoleon Street footpath</td>
</tr>
</tbody>
</table>

6 Approximation of relative amount of disturbance to residents computed as the sum of the number of addresses within 200 feet of construction multiplied by the duration of the activity at that location.
<table>
<thead>
<tr>
<th>Impact</th>
<th>Cut-and-Cover</th>
<th>Small-Diameter Micro-Tunneling (Boring)</th>
<th>Large-Diameter Tunneling (Mined)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Degrade existing visual character</td>
<td>Significant but temporary from Construction activities; Significant long term from loss of mature trees</td>
<td>Significant but temporary from Construction activities; Significant long term from loss of mature trees</td>
<td>Significant but temporary from Construction activities; Significant long term from loss of mature trees</td>
</tr>
<tr>
<td>Impact scenic vista</td>
<td>Significant but temporary from Construction activities; Significant long term from loss of mature trees</td>
<td>Significant but temporary from Construction activities; Significant long term from loss of mature trees</td>
<td>Significant temporary</td>
</tr>
<tr>
<td>Damage scenic resource</td>
<td>not significant</td>
<td>Significant long term from loss of mature trees</td>
<td>None</td>
</tr>
<tr>
<td>Add light or glare</td>
<td>none</td>
<td>none</td>
<td>None</td>
</tr>
<tr>
<td>Shade/shadow</td>
<td>none</td>
<td>none</td>
<td>None</td>
</tr>
<tr>
<td>Inconsistent with regulations</td>
<td>Significant temporary from construction in Scenic Hwy</td>
<td>Significant temporary from construction in Scenic Hwy</td>
<td>Significant temporary</td>
</tr>
</tbody>
</table>

Del Rey Lagoon Park parking, Napoleon Street foot path

Beach w/ cut & cover ends

Pacific
MARQUESAS WAY/VIA MARINA WAY SEGMENT OF THE VIA MARINA ALIGNMENT
This alignment and the channel micro-tunnel launching and receptor shafts associated with it are subject to impacts associated with construction staging of equipment, parking and related traffic throughout the 18- to 24-month duration of construction along Hurricane Street, Marquesas Way and Via Marina Way respectively. This alternative is within a designated segment of a scenic highway requiring the preservation of scenic views, which would be infeasible resulting in a significant and unavoidable impact from construction activities during the tourist season. Unavoidable impacts to parking and pedestrian traffic would result from micro-tunnel activities on each side of the Grand Canal at the junction with Hurricane Street and in the empty lot between residential housing west of Marquesas Way and leading to the sidewalk next to the Grand Canal.

Temporary impacts to water quality and marine resources could occur through the unintentional release of excavated sediments and water into the channel as a result of micro-tunnel activities, although this alignment is not likely to result in a long-term reduction in water quality or the loss of individuals or habitat.

HURRICANE STREET/PACIFIC AVENUE SEGMENT OF THE PACIFIC AVENUE ALIGNMENT
Impacts from this alternative would result from construction-related activities associated with cut-and-cover construction along Hurricane Street and Pacific Avenue and at a micro-tunnel receptor shaft at Pacific Avenue near Via Marina Way, and at a launching shaft located on the south side of the channel on the east side of the Pacific Avenue pedestrian bridge. This alternative would cause significant unavoidable impacts to visual aesthetics of the vicinity and parking and traffic impacts to residents and tourists, who live and visit the area. Access to parks and parking facilities for Dockweiler Beach, the pedestrian bridge and public parking facilities at Pacific Avenue on the south side of the channel would be reduced as a result of construction-related staging, vehicles and mobile equipment for a period of 18 to 24 months. Noise impacts associated with the proximity of construction-related equipment to residents and visual impacts due to equipment staging are also anticipated.

Temporary impacts to water quality and marine resources could occur through the unintentional release of excavated sediments and water into the channel as a result of micro-tunnel activities. This alternative is not likely to result in a long-term reduction in water quality or the loss of individuals or habitat.

No permanent impacts on least tern foraging habitat (Marina Del Rey Channel, Ballona Creek, and Grand Canal) in the Project area are expected.

HURRICANE STREET/DOCKWEILER BEACH SEGMENT OF THE BEACH ALIGNMENT
The cut-and-cover method of construction for this beach alignment has been considered, but deemed not viable; however, deep mined-tunneling construction alternatives are also considered for the beachfront. Impacts at the launching shaft in Vista Del Mar would mostly impact traffic, and the receptor shaft at the intersection of Dockweiler Beach and Hurricane Street would result in noise, surface vibration, and increased human disturbance, as well as potentially attracting predators to the least tern nesting site (i.e., crows) located on Dockweiler Beach just north of the channel entrance and the west end of Via Marina Way. Construction activities may result in temporary effects on least terns (see Appendix D, Biological Technical Report). Temporary impacts to water quality and marine resources could occur through the
unintentional release of excavated sediments and water into the channel as a result of micro-tunnel activities. This alternative is not likely to result in a long-term reduction in water quality or the loss of individuals or habitat.

DOCKWEILER BEACH ALIGNMENT

This southern extension of Dockweiler Beach alternative is located along the beach of the south side of the Via Marina Channel. The cut-and-cover method of construction for this alignment has also been considered, but deemed not viable; however, deep-mined tunneling construction alternatives are also proposed for the beachfront and are described in Section 4.0. Impacts at the launching shaft in Vista Del Mar would mostly impact traffic, and the receptor shaft at the intersection of Dockweiler Beach and Hurricane Street would impose noise, surface vibration, and increased human disturbance, as well as potentially attracting predators to the least tern nesting site (i.e., crows) located on Dockweiler Beach just north of the channel entrance and the west end of Via Marina Way. Visual impacts associated with potential construction equipment and activities methane venting.

PACIFIC AVENUE/VISTA DEL MAR SEGMENT OF THE VIA MARINA AND PACIFIC AVENUE ALIGNMENTS

This is the southern extension of both the Pacific Avenue alternative and the Via Marina alternative, located on the south side of the Marina del Rey and Ballona Creek channels. Construction along Vista del Mar, a scenic highway, would have temporarily visual/aesthetic impacts. Monitoring during the course of construction would be required to mitigate the potential for impacts to historic/cultural/paleontological resources as described in the Cultural Resource section (Section 5.5) of this EIR. No permanent impacts on least tern foraging habitat (Marina Del Rey Channel, Ballona Creek, and Grand Canal) in the Project area are expected.

Temporary impacts to water quality and marine resources could occur through the unintentional release of excavated sediments and water into the channel as a result of micro-tunnel activities. Although this alternative is unlikely to result in a long-term reduction in water quality or the loss of individuals or habitat.

LARGE-DIAMETER (MINED) TUNNEL ALTERNATIVES

Each starter shaft and receptor shaft for the deep mined-tunnel construction alternatives have their own numeric identifier, shown on Figure ES-2. Construction impacts would be as described above and summarized in Table 3.3-1.

3.2.2 Growth-Inducing Impacts

Growth-inducing impacts are secondary, or indirect, impacts that could occur as a result of the project that are manifested as changes in land use patterns, population density and growth rates; and related effects on traffic, public services, air, water, biological and other environmental resources7.

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7 Section 15126.2(d) of the CEQA Guidelines
The VPP Dual Force Main Project would not induce growth in population or changes in land use which would not otherwise occur. As summarized below and more fully discussed in Section 7.0 of the Draft EIR, no significant growth-inducing impacts are associated with the proposed Project. This section of the Executive Summary addresses the role that wastewater conveyance capacity plays in the growth of the region. The primary types of growth that occur in the City and vicinity are land use development and population. Because these types of growth are distinct, and interrelated, this section examines the relationship of sewer conveyance capacity with each type of growth.

**Land Use Development and Wastewater Conveyance**

The development of land in the City is governed by General Plan and Zoning land use designations of particular parcels. Zoning implements the land use policies contained in the General Plan and is consistent with the General Plan. Unless conditional use permits or density transfers are obtained from the Planning Department, development must conform to the use type and density designated for that parcel. The decision of a land owner to develop a single parcel or numerous parcels of land may be based on personal or economic reasons. Whether personal, economic, or both, the availability of wastewater conveyance capacity is not likely to be a consideration in the decision to develop. Once the decision to develop a parcel has been made, permission to connect to the wastewater collection system must be obtained as part of the building permit process. A sewer connection permit can only be obtained if adequate capacity to serve the proposed development is available. Sewer connection and other building permit fees are charged in proportion to the density of development proposed. The high sewer connection fees and other building permit fees associated with the most intensive levels of development increase the costs of developing land in the City and can be considered economic disincentives to development.

In a mature urbanized area such as Los Angeles with sufficient wastewater treatment capacity, the provision of wastewater conveyance capacity would not induce land development that would not otherwise occur.

**Population Growth and Wastewater Capacity**

Population within southern California and the City of Los Angeles is anticipated to grow significantly over the next 20 years and further into the future. The projected increase in population will come from two sources, natural increases and in-migration. SCAG predicts that approximately 60 percent of projected future population growth would occur from natural causes (births minus deaths) and 40 percent would come from the in-migration of people from other areas.

Wastewater conveyance capacity is required to accommodate the increases in wastewater flows associated with the population increases. The provision of wastewater conveyance capacity will not induce either natural population growth or in-migration. SCAG has established the policy that conveyance systems, including interceptors, are not subject to its air quality conformity procedures, because of the absence of effects on population growth.

**Growth Management in Los Angeles**

The Southern California Association of Governments, which includes the City of Los Angeles among its member jurisdiction, has prepared the Regional Comprehensive Plan and Guide and the Growth...
Management Plan. These plans address regional growth and related issues. In addition, the City of Los Angeles’ General Plan governs land use development within its jurisdiction.

The Regional Comprehensive Plan and Guide (March 1996) serves as a comprehensive overview of the issues and opportunities facing the region. This plan consists of three sections, core chapters, ancillary chapters, and bridge chapters. Core chapters include plans such as the Growth Management Plan, the Regional Mobility Plan, Air Quality Plan, and other documents that SCAG is required to produce (by federal and/or state mandates). Ancillary chapters address such issues as the economy, housing, and reflect other plans but serve only an advisory purpose for member governments. Bridge chapters link the core and ancillary chapters for other areas of concern.

The Growth Management Plan presents forecasts and policies for anticipated growth to the year 2020. The Growth Management Plan is based upon the amount of growth that is likely to occur and recognizes that there are no viable ways in which to control total growth. The Plan, however, seeks to control the distribution of growth in order to improve the balance between jobs and housing by encouraging housing growth in job rich areas and vice-versa.

The City’s General Plan (comprised of the 35 Community Plans) governs the location and density of land use in the City through the zoning process. The Los Angeles City Planning Department revised the General Plan and the new plan, termed the “General Plan Framework,” is intended to balance land use development, transportation, projected future population and projected future employment within the City of Los Angeles. The General Plan Framework’s options include areas of targeted growth with higher land use designations and densities around commuter rail stations and along transportation corridors.

The planned growth of population along corridors would result in higher demands on infrastructure. There would be a need to accommodate greater quantities of wastewater that would be generated. Consequently, new wastewater conveyance facilities must be constructed, or existing facilities must be improved or upgraded.

**CONCLUSIONS REGARDING GROWTH INDUCEMENT**

Wastewater conveyance capacity is an infrastructure component of the urban environment that is necessary to safely accommodate the needs of existing and projected future populations. The provision of wastewater conveyance capacity, in and of itself, will not induce population growth or land use development. Rather, wastewater conveyance capacity would allow population growth to occur within the General Plan Framework while minimizing sewage spills and the associated environmental, health and safety problems. Future land uses would generally not occur in densities higher than those allowed by the land use planning process. Any development projects beyond the scope of the City’s General Plan would undergo individual environmental analysis (including impacts to the wastewater system) and would have to be approved by the City Council.

In wastewater planning, the sizing of collection and treatment facilities, as well as the overall system configuration, is dependent on the future system-wide flow and the distribution of that flow within the system. Since the timing of necessary improvements is partly a function of growth, a realistic estimate of the future population to be served is fundamental to effective wastewater system planning.
The VPP Dual Force Main Project would not induce growth in population or changes in land use which would not otherwise occur. No significant growth-inducing impacts are therefore associated with the project.

3.2.3 Cumulative Impact Analysis

Cumulative impacts refer to two or more individual effects, that when considered together, are considerable. Cumulative impact assessment considers not only the impacts of the proposed Project, but also the impacts from other City and private projects, which would occur during the period of performance and geographic area of the proposed Project. There would likely be construction activities occurring in the vicinity of the VPP Dual Force Main Project as a result of other projects being built in the same general time frame. These related projects are listed in Table 1.7-1 above. The VPP Dual Force Main Project, along with other construction projects, could contribute to temporary cumulative noise and vibration effects. Construction activities may result in cumulative effects of the following nature:

Noise and Vibration – Local residents in the near vicinity of construction activities would be exposed to noise and possible vibration. The cumulative effects, both in terms of added noise and vibration at multiple VPP Dual Force Main construction sites, and in the context of other related projects, are not considered significant due to the temporary nature of noise increases and the recommended mitigation measures.

Air Quality – The VPP Dual Force Main Project will produce additional emissions of criteria pollutants and slightly elevated levels of carbon monoxide during construction. Emission of criteria pollutants resulting from the Project’s construction would exceed the thresholds established by the SCAQMD, and therefore the Project, in conjunction with all other construction activity, would cumulatively contribute to the region’s non-attainment status during the construction period. The SCAQMD prepared the Air Quality Management Plan (2003) to bring the region into compliance with the National Ambient Air Quality Standards as set by the EPA under the Clean Air Act Amendments (1990). The Air Quality Management Plan is essentially designed to address the cumulative air pollutants released into the South Coast Air Basin. Because these construction-related emissions are temporary (18-24 months, depending on the construction method) and because the Air Quality Management Plan addresses cumulative air pollution in the South Coast Air Basin, the Project would not result in long-term significant cumulative air quality impacts. In the short term, cumulative impacts could be significant if the combined emissions from the projects exceed the threshold criteria for the individual pollutants. Mitigation measures are in place to reduce impacts on air quality.

Transportation and Circulation – The VPP Dual Force Main Project would involve construction activities occurring simultaneously at a number of surface sites along the Project alignment. Construction of the VPP Dual Force Main Project may be occurring in the same general time and space as other related projects. In these instances, surface construction activities from both sets of Project could produce cumulative traffic effects which may be significant, depending upon a range of factors including the specific location involved and the precise nature of the conditions created by the dual construction activity (see Traffic-Related Project Construction Schedule in Table 4.2-1 of the EIR). Special

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8 Section 15355 of the CEQA Guidelines
coordination efforts may be necessary to reduce the combined effects to an acceptable level with the adoption of mitigation measures. Overall, with implementation of mitigation measures, significant cumulative impacts are not anticipated.

**Public Services** – The cumulative effects on public services in the VPP Dual Force Main study area would cause traffic and circulation inconveniences in some locations due to reduced parking, lane closures and potential schedule adjustments to public transportation as discussed in the EIR; however, these impacts would be temporary and would be limited to traffic inconveniences discussed above.

**Aesthetics** – Construction activities associated with other related projects may be ongoing in the vicinity of one or more VPP Dual Force Main construction sites. To the extent that combined construction activities do occur, there would be temporary adverse visual effects during construction in some locations. However, these impacts would be temporary.

**Beneficial Effects** – The VPP Dual Force Main Project would also have long-term beneficial cumulative effects with regards to improvements to the City of Los Angeles’ wastewater collection system. The proposed Project would result in cumulative public health benefits by minimizing or eliminating the potential for the public to be exposed to wastewater that could overflow onto streets during rainy weather and flow into area channels and the Pacific Ocean. Public safety, in the short and long-term, would be improved by minimizing the potential for sewer and street collapses associated with deteriorated sewers.

### 3.3 Environmentally Superior Alternative

Following consideration of public comments on the Draft EIR, the analysis of the various construction and alignment alternatives was finalized and the environmentally superior alternative was identified (see Section 3.2).

Based upon the comparative impact analysis for this project and as shown in Table 3.3-1, it has been determined that the environmentally superior alternative is the large-diameter (mined) tunnel along the inland (Pacific Avenue) alignment from LAX to Venice Pumping Plant (identified as mined tunnel alternative 4 in the DEIR). This alternative would impose the least number of impacts to environmental resources, and would significantly reduce construction related impacts such as traffic and parking congestion, noise and vibration. The proposed alignment as shown on Figure 4.2-2, would begin at launch shaft #2 located in Vista Del Mar and run due north toward the pumping plant on Hurricane Street and tie in at the #10 receptor shaft. Although the deep mined tunnel would run directly under existing dwellings and facilities in some locations, great care would be taken to insure that wherever possible, the alignment would follow existing rights of way. For those portions of the alignment that would require tunneling under existing dwellings and/or facilities, the City would provide community outreach to work with those who are within the proposed alignment to fully understand the construction methodology, to secure proper right of way access, and to provide compensation for the right of way.
3.4 MITIGATION MEASURES

The EIR describes mitigation measures which are expected to avoid or substantially reduce the significant environmental impacts of the proposed Project. Table 3.4-1 presents the impacts, recommended mitigation measures, and the level of significance after mitigation.
### Table 3.4-1. Environmental Impacts and Mitigation Measures

<table>
<thead>
<tr>
<th>Impact ID</th>
<th>Environmental Impact</th>
<th>Mitigation Measure</th>
<th>Post Mitigation Level of Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Air Quality</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AIR 1</td>
<td>NOx emissions in construction areas.</td>
<td>Extend timeline for construction, thereby utilizing less equipment on a daily basis.</td>
<td>Less than Significant</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Utilize newer construction equipment that meet tier emissions standards</td>
<td>Less than Significant</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Use of alternative fuel such as biodiesel, liquid natural gas, and propane.</td>
<td>Less than Significant</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Adjust engine timing to reduce NOx emissions.</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>BIO 1</td>
<td>If the Venice Beach/Dockweiler Beach alignment is selected and construction is to be aboveground, or if tunneling is used and the jacking and/or receiving pit is within 500 feet of the nesting site, and any construction activities are to occur during the least tern nesting season (April 1 through August 31)</td>
<td>A biological monitor with experience observing and documenting disturbance to least terns shall be present during all construction activities within 500 feet of the nesting site to ensure that construction activities do not adversely affect least terns using the nesting site. In addition, the monitors will ensure that work crews properly dispose of all garbage in covered containers.</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>BIO 2</td>
<td>a: If any tunneling activities are to occur during the least tern nesting season (April 1 through August 31)</td>
<td>A water quality specialist or biological monitor shall conduct surveys at tunneling locations a minimum of once daily to ensure that tunneling does not increase water turbidity.</td>
<td>Less than Significant</td>
</tr>
<tr>
<td></td>
<td>b: If any turbidity from the tunneling activities is discovered in least tern foraging areas</td>
<td>The tunneling activities shall cease until the leak from the tunnel that is resulting in turbidity is repaired or managed.</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>BIO 3</td>
<td>a: Existing and potential values in environmentally sensitive habitat areas shall be protected, enhanced, and where feasible, restored. If any habitat is disturbed, restore to previous undisturbed condition.</td>
<td>Based on the City of Los Angeles LUP and LCP, restore to ESHAs to previous undisturbed condition.</td>
<td>Less than Significant</td>
</tr>
<tr>
<td></td>
<td>b: Marine resources shall be maintained, enhanced, and where feasible, restored. If any habitat is disturbed, restore to previous undisturbed condition.</td>
<td>Based on the City of Los Angeles LUP and LCP, restore to previous undisturbed condition.</td>
<td>Less than Significant</td>
</tr>
<tr>
<td><strong>Circulation, Traffic and Parking</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TRA 1</td>
<td>To coordinate with the city to ensure adequate traffic signals and controls are in place prior to and during times of construction</td>
<td>For each construction site, a construction traffic management plan shall be prepared and submitted to the City for review and approval prior to the start of any construction work.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>TRA 2</td>
<td>To adequately control traffic to ensure compliance with all local and state safety standards and specifications</td>
<td>A site-specific construction worksite traffic control plan shall be prepared for each construction site and submitted to the City for review and approval prior to the start of any construction work. This plan shall include such elements as the location of any lane closures, restricted hours during which lane closures would not be allowed, local traffic detours, protective devices and traffic controls (such as barricades, cones, flagmen, lights, warning beacons, temporary traffic signals, warning signs), access to abutting properties, and provisions to maintain emergency access through construction work areas. Coordinate with emergency service providers (police, fire, ambulance and paramedic services) to provide advance notice of any lane closures, construction hours and changes to local access and to identify alternative routes where appropriate.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>Impact ID</td>
<td>Environmental Impact</td>
<td>Mitigation Measure</td>
<td>Post Mitigation Level of Impact</td>
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</tr>
<tr>
<td>TRA 3</td>
<td>To reduce traffic congestion</td>
<td>Fully utilize available street space to minimize lane reductions on affected streets, including elimination of on-street parking where necessary. Implement left-turn restrictions as appropriate on re-striped street segments to facilitate the movement of through traffic. Only eliminate travel lanes when absolutely necessary.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>TRA 4</td>
<td>To protect pedestrian and recreational traffic</td>
<td>Provide signage indicating alternative pedestrian and bicycle access routes where existing facilities would be affected.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>TRA 5</td>
<td>To ensure ingress/egress to all properties adjacent to the project and surrounding areas</td>
<td>Provide advance notice to any affected residents, businesses and property owners in the vicinity of each construction site and, where existing property access will be reduced, identify alternative means of access.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>TRA 6</td>
<td>To avoid impacts to public transportation</td>
<td>Coordinate with public transit providers (MTA, LADOT Commuter Express, Culver City Bus) to provide advance notice of any lane closures, construction hours and, where necessary, to identify sites for temporary bus stops within a reasonable walking distance of any displaced bus stops.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>CR 1</td>
<td>To avoid impacts to areas where cultural resources are known to exist</td>
<td>A qualified cultural monitor shall be on site in areas of known cultural finds where grading is to occur.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>CR 2</td>
<td></td>
<td>When avoidance cannot be achieved, alternate measures such as surface collection and/or subsurface data recovery of significant sites must be implemented;</td>
<td>Less than significant</td>
</tr>
<tr>
<td>CR 3</td>
<td>In the event of the discovery and subsequent recovery of fossil remains</td>
<td>A qualified monitor should halt construction temporarily while remains are analyzed prior to resuming construction.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>CR 4</td>
<td>At CA-LAN –66 location</td>
<td>Monitor all construction in the vicinity of the CA-LAN-66 site located in Vista Del Mar by an Archaeologist qualified to recognize and assess both prehistoric and historical resources</td>
<td>Less than significant</td>
</tr>
<tr>
<td>CR 5</td>
<td>If new discovery is encountered</td>
<td>Develop a contingency plan for addressing unanticipated new discoveries of cultural resources in the project area, evaluate and report any findings</td>
<td>Less than significant</td>
</tr>
<tr>
<td>CR 6</td>
<td>If significant cultural resources are found during construction</td>
<td>Those significant cultural resources found shall be recovered from the project site, curated by an archaeologist recommended by the city and offered to an area museum whose collection is available for the viewing by the public</td>
<td>Less than significant</td>
</tr>
<tr>
<td>PAL 1</td>
<td>The discovery of paleontology resources may be present in specific project areas where grading and other excavation activities are to occur</td>
<td>Prior to construction, the services of a qualified vertebrate paleontologist approved by the City of Los Angeles and LACMVP will be retained to implement the mitigation program during earth-moving activities at the project site.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>Impact ID</td>
<td>Environmental Impact</td>
<td>Mitigation Measure</td>
<td>Post Mitigation Level of Impact</td>
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</tr>
<tr>
<td>PAL 2</td>
<td>The paleontologist will develop a formal agreement with a recognized museum repository, such as the LACMVP or LACMIP, regarding the final disposition and permanent storage and maintenance of any fossil remains and the archiving of associated specimen data and corresponding geologic and geographic site data that might be recovered as a result of the mitigation program, and the level of treatment (preparation, identification, curation, cataloguing) of the remains that would be required before the entire mitigation program fossil collection would be accepted by the repository for storage.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>PAL 3</td>
<td>The paleontologist or monitor will coordinate with the appropriate construction contractor personnel to provide information regarding lead agency requirements for the protection of paleontologic resources. Contractor personnel also will be briefed on procedures to be followed in the event that a fossil site or remains are encountered by earth-moving activities, particularly when the monitor is not on site. The briefing will be presented to new contractor personnel as necessary.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>PAL 4</td>
<td>Earth-moving activities will be monitored by the monitor only in those areas of the project site where these activities will disturb previously undisturbed strata. Monitoring will be conducted on a full-time basis in areas underlain by the Palos Verdes Sand and, once the activities have reached a depth 5 feet below grade, on a full-time basis in areas underlain by the coastal deposits and on a half-time basis in areas underlain by the dune sand. If fossil remains are encountered by these activities, monitoring will be increased to full time, if appropriate, at least in the vicinity of the fossil site where the area is underlain by the fossil-bearing rock unit. If no fossil remains are found once 50 percent of earth-moving activities have been completed in an area underlain by a particular rock unit, with City of Los Angeles approval, monitoring can be reduced or suspended in that area.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>PAL 5</td>
<td>All fossil specimens recovered from the project site as a result of the mitigation program, including those recovered as the result of processing fossiliferous rock samples, will be treated (prepared, identified, curated, catalogued) in accordance with designated museum repository requirements. Small rock samples from the Palos Verdes Sand, dune sand, and coastal deposits will be submitted to commercial laboratories for microfossil, pollen, or radiometric (carbon-14) dating analysis.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>PAL 6</td>
<td>Monitoring will consist of visually inspecting debris piles and freshly exposed strata for larger fossil remains, and periodically dry test screening sediment, rock, and debris for smaller fossil remains. As soon as practicable, the monitor will recover all vertebrate fossil specimens, a representative sample of invertebrate or plant fossils, or any fossiliferous rock sample that can be recovered easily. If recovery of a large or unusually productive fossil occurrence is warranted, earth-moving activities will be diverted temporarily around the fossil site and a recovery crew will be mobilized as necessary to remove the occurrence as quickly as possible. If not on site when a fossil occurrence is uncovered by these activities, the activities will be diverted temporarily around the fossil site and the monitor called to the site to evaluate and, if warranted, recover the occurrence. If the fossil site is determined too unproductive or the fossil remains not worthy of recovery, no further action will be taken to preserve the fossil site or remains, and earth-moving activities will be allowed to commence.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>Impact ID</td>
<td>Environmental Impact</td>
<td>Mitigation Measure</td>
<td>Post Mitigation Level of Impact</td>
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</tr>
<tr>
<td>GEO 1</td>
<td>Project improvements would be subject to earthquake ground shaking</td>
<td>The components of the proposed project will be designed and constructed to the seismic design requirements for ground shaking specified in the UBC for Seismic Zone 4 at a minimum.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>GEO 2</td>
<td>Liquefaction and differential seismic settlement may occur on the project</td>
<td>Design and construction of the proposed project will include mitigation measures, such as flexible connections that can accommodate differential settlement, compaction grouting to densify the soils, or structural anchors to secure the pipeline.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>GEO 3</td>
<td>Subsidence may occur to the project area</td>
<td>Design and construction of the proposed project will include mitigation measures, such as a watertight excavation support system to minimize groundwater pumping or construction the pipeline in a “wet” excavation.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>GEO 4</td>
<td>Methane gas may be detected along the project alignments</td>
<td>Design and construction of the proposed project will include active or passive mitigation systems for methane gas hazards, if necessary.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>GEO 5</td>
<td>Tsunami could strike the project area</td>
<td>To mitigate erosion of surficial soils covering the proposed pipeline in the event of a tsunami, proper design and construction of the project components could include erosion control measures or choosing an alternate alignment off of the beach.</td>
<td>Less than significant</td>
</tr>
</tbody>
</table>

**Hazardous Waste and Materials**

<p>| HAZ 1    | Well abandonment may occur in the marina channel areas and in various alignment areas  | For any wells that may need to be re-abandoned, well abandonment should be done in accordance with applicable regulations; other subsurface structures may be encountered during development work. The soils may contain methane or other gases from previous oil well field development. Site chemicals must be handled and disposed in accordance with applicable regulations. Hazardous materials would be used and waste generated during the construction and operation of the project. | Less than significant          |
| HAZ 2    | Employees may be exposed to hazardous materials during construction                    | Exposure of construction workers to contaminated materials can be minimized by implementing the measures required by federal, state, and local laws and regulations. As such, potential impacts associated with the excavation of contaminated materials would be less than significant. | Less than significant          |
| HAZ 3    | Storage of hazardous materials will occur on the project sites                         | As required in SWPPP and project specifications.                                                                                                                                                                       | Less than significant          |
| HAZ 4    | Methane gas may be located in alignment areas where tunneling activity is to occur along the project alignment | A surface sweep is a method for measuring combustible vapors which may be emitted from the ground surface. When conducting the surface sweep, more attention can be taken in areas where underground gas would tend to exit the surface, such as at cracks in the ground. | Less than significant          |</p>
<table>
<thead>
<tr>
<th>Impact ID</th>
<th>Environmental Impact</th>
<th>Mitigation Measure</th>
<th>Post Mitigation Level of Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>HAZ 5</td>
<td>Methane may be present along the project alignments</td>
<td>The City of Los Angeles Building Code requires that methane mitigation be implemented when construction occurs at these sites to ensure public safety. These measures include the installation of membrane barriers and vent piping as well as trench dams and electrical seal-offs for each of these properties.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>HYDRO/</td>
<td>Runoff may occur from the project site during construction activities</td>
<td>A SWPPP shall be submitted for review and approval. The SWPPP shall recommend interim and permanent improvements to existing drainage features to prevent uncontrolled runoff during construction and to accommodate any temporary increase in runoff associated with construction activities.</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>WQ 1</td>
<td>Runoff may occur from the project site during construction activities</td>
<td>Compliance with the SWPPP shall be demonstrated by obtaining a NPDES construction permit for all construction activities including clearing, grading, or excavation that result in the disturbance of at least 1-acre of total land area or activity which is part of a larger common plan of development of 1 acre or greater. Copies of said NPDES permit(s) and related SWPPP shall be available for inspection at the City and at the construction site prior to land disturbing activity. Total disturbance area includes the staging and material storage areas. Although this project may not total over one acre of actual disturbance area, because of the highly sensitive habitat areas within the project, a SWPPP should be a required mitigation element.</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>HYDRO/</td>
<td>Dewatering discharge is expected to occur during the initial phase of pit construction</td>
<td>Hydraulic isolation of the pits can be accomplished by the contractor by various methods of his choice, including interlocking sheet pile walls, soil cement walls constructed with Deep Mixing Methods, or slurry diaphragm walls. Water removed from the pits will be discharged to the storm drain system after proper treatment in accordance with local regulations. Solid particles will be removed by using sedimentation tanks and filtration. If petroleum contamination is encountered, free product, if any, will be skimmed off the surface and oil/water separators will be used to remove the remaining contamination. Granular activated carbon could be used to remove any dissolved organic or other contaminants. Alternatively, discharged water will be shipped to authorized vendors for treatment and disposal.</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>WQ 2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Noise and Vibration

<p>| NOI 1    | Construction noise levels that exceed city and county standards may be created during project construction activities. | All construction activities shall be limited to the hours of 7:00 a.m. to 9:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday. No construction or construction-related activities shall take place on any Sunday or national holiday. | Less than significant           |
| NOI 2    | Heavy trucks engaged in the removal of muck from tunneling operations off site via heavy trucks shall be limited to major arterial streets and away from residential roadways, to the extent practicable. |                                                                                                                                                                                                                  | Less than significant           |</p>
<table>
<thead>
<tr>
<th>Impact ID</th>
<th>Environmental Impact</th>
<th>Mitigation Measure</th>
<th>Post Mitigation Level of Impact</th>
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</thead>
<tbody>
<tr>
<td>NOI 3</td>
<td>All noise-producing project equipment and vehicles using internal combustion engines shall be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. Mobile or fixed “package” equipment (e.g., arc-welders, air compressors) shall be equipped with shrouds and noise control features that are readily available for such type of equipment.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>NOI 4</td>
<td>All mobile or fixed noise-producing equipment used on the project, and that is regulated for noise output by a local, state, or federal agency, shall comply with such regulation while in the course of project activity.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>NOI 5</td>
<td>The erection of temporary soundwall barriers shall be considered where project activity is unavoidably close to noise-sensitive receptors.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>NOI 6</td>
<td>Electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment where feasible.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>NOI 7</td>
<td>Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>NOI 8</td>
<td>Construction site and haul-road speed limits shall be established and enforced during the construction period.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>NOI 9</td>
<td>The use of noise-producing signals, including horns, whistles, alarms, and bells shall be for safety warning purposes only.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>NOI 10</td>
<td>No project-related public address or music system shall be audible at any adjacent receptor.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>NOI 11</td>
<td>The on-site construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the owner shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>NOI 12</td>
<td>The contractor shall develop a project noise control plan, which shall have been approved by the owner or designated noise control professional and implemented prior to commencement of any construction activity.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>VIB 1</td>
<td>Vibration may occur in the project area during construction activities: Installation of instruments throughout a sensitive building, to be used in monitoring and recording building behavior (movements, vibrations) due to adjacent tunneling activities.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>VIB 2</td>
<td>Any physical, chemical or biological method, or any combination of such methods, used to increase the bearing capacity or decrease the permeability of soils under the foundation of existing buildings.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>VIB 3</td>
<td>A specialized form of grouting used to compensate for movements and settlements caused by tunneling adjacent to or beneath existing buildings.</td>
<td>Less than significant</td>
<td></td>
</tr>
<tr>
<td>Impact ID</td>
<td>Environmental Impact</td>
<td>Mitigation Measure</td>
<td>Post Mitigation Level of Impact</td>
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</tr>
<tr>
<td><strong>REC 1</strong></td>
<td>Construction-related activities may impact areas and facilities used by the public for sporting events and recreational activities</td>
<td>Provide advanced notice to the public, businesses, sports/recreation groups and property owners indicating time and duration of non-use or partial use of facilities/areas to be impacted by construction.</td>
<td>Less than Significant</td>
</tr>
<tr>
<td><strong>AES 1</strong></td>
<td>Where impacts may not be directly mitigated, they may be offset by actions taken elsewhere to compensate for the loss of visual quality. It would be speculative to definitively list specific offsetting actions at this time.</td>
<td>The city shall consider landscaping public areas within affected neighborhoods where open space is currently degraded and unsightly. The city shall consider screening from public view existing features, which are incongruous with the character of their surroundings (such as the VPP). The city shall consider creating public access to currently unavailable scenic vistas (new beach access routes, paths, bikeways, public parking).</td>
<td>Significant short term</td>
</tr>
</tbody>
</table>
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11.0 RESPONSES TO COMMENTS

This section of the Final EIR includes comments received by the City of Los Angeles on the Draft EIR, and responses to these comments. The comments include both written comments received by the City and oral comments presented to the City at a public hearing on the Draft EIR held on February 23, 2006. As required by the California Environmental Quality Act (CEQA), responses to comments are provided for the written and oral comments received by the City.

A complete list of commenting public agencies and private individuals is provided below. Written comment letters and comments made during the public comment meeting on the Draft EIR are provided in Sections 11.3 and 11.4 of this Chapter. Section 11.3 provides copies of all written letters submitted to the City, and Section 11.4 provides a complete transcript of the public hearing conducted by the City on the EIR. Written responses to the comments are provided in Section 11.5 of this Chapter (see page 11-100).

11.1 LIST OF PUBLIC AGENCIES AND INDIVIDUALS PROVIDING WRITTEN COMMENTS

STATE AGENCIES
Department of Transportation ................................................................. Page 11-9
District 7, Regional Planning
IGR/CEQA Branch
Attn: Cheryl J. Powell
100 Main Street, MS #16
Los Angeles, CA 90012-3606
Letter dated: 02/22/06

California Coastal Commission ............................................................. Page 11-10
South Coast Area Office
Attn: Pam Emerson
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302
Letter dated: 03/16/06

LOCAL AGENCIES
County of Los Angeles ................................................................. Page 11-13
Department of Public Works
Attn: Ms. Clarice Nash
900 South Fremont Avenue
Alhambra, CA 91803-1331
www.ladpw.org
Letter dated: 03/15/06
PRIVATE INDIVIDUALS
Brett W. Hawkins, Jr. ................................................................. Page 11-14
President & Founder
Global Gaming League
brett@ggl.com
Letter dated: 02/09/06

Carol Kapp ............................................................................. Page 11-15
127 Rees Street
Playa Del Rey, CA 90293
Letter dated: 02/20/06

Gene Haberman................................................................. Page 11-19
genehabe@yahoo.com
Later dated: 03/04/06

John B. Kilroy ................................................................. Page 11-20
5306 Pacific Ave.
Marina Del Rey, CA 90292
JBKMDR@AOL.COM
Letter submitted: 03/14/06
Attachment 1 to John B. Kilroy Letter ................................ Page 11-23
Marina Peninsula Neighborhood Association
Attn: Lowell Safire
11 Mast Street
Marina Del Rey, CA 90292
Letter dated: 04/09/03
Attachment 2 to John B. Kilroy Letter ................................ Page 11-26
John S. Perkins
5209 Ocean Front Walk #101
Marina Del Rey, CA 90292
Letter dated: 11/27/02

Don Hollands................................................................. Page 11-29
6400 Pacific Ave., #304
Playa Del Rey, CA 90293
don-hol@comcast.net
Letter dated: 03/16/2006

Mark Van Gessel, P.E. ................................................................. Page 11-31
vangessel@comcast.net
Letter dated: 03/16/06
COMMENT CARDS FROM PUBLIC MEETING

Madeline Dinonno ............................................................................................................ Page 11-49
Comment dated: 02/23/06

Susan Papadakis ............................................................................................................. Page 11-50
Grass Roots Venice Neighborhood Council
Los Angeles, CA 90291
Comment dated: 02/23/06

Phil Raider .................................................................................................................... Page 11-51
Grass Roots Venice Neighborhood Council
Comment dated: 02/23/06

FEBRUARY 23, 2006 PUBLIC MEETING TRANSCRIPT........................................ Page 11-52
11.2 **Summary of Comments**

Table 11-1, below, provides a summary of comments received from the public and private agencies on the adequacy of the EIR. Many of the comments relate to the same issue, although sometimes in different ways or with a slightly different emphasis. Nonetheless, there are redundancies or overlapping of the comments. In summary, the comments relate to forty-four (44) environmental issues described in Table 11-1. Responses to these comments are provided in section 11.5 and are presented and identified by the comment identification number shown in Table 11-1.

Table 11-2 notes the comment issue areas raised in the eleven (11) written responses received by the City from public agencies and the general public. Finally, Table 11-3 notes comment issue areas raised in the oral and written comments received by the City at the February 23, 2006 public hearing. Tables 11-2 and 11-3 show that many letters and oral comments addressed the same issue: for example, three written letters commented on construction-related parking impact, which is comment “CON-1”; this issue was also raised by two people at the public hearing.

**Table 11-1: Comments on Draft EIR**

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Comment Name</th>
<th>Comment Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ALGN-1</td>
<td>Preferred Alignment - Beach</td>
<td>The beach alignment of the project is preferred because it is the least disruptive to local residents.</td>
</tr>
<tr>
<td>ALGN-2</td>
<td>Preferred Alignment - Non-beach</td>
<td>The beach alignment of the project is not preferred because of potential environmental impacts to the coast.</td>
</tr>
<tr>
<td>ALT-1</td>
<td>Alternative - No Project Analysis</td>
<td>The no-project alternative is preferred because it would limit development and growth.</td>
</tr>
<tr>
<td>ALT-2</td>
<td>Alternative - New Alternative</td>
<td>The EIR should consider additional alternatives.</td>
</tr>
<tr>
<td>ALT-3</td>
<td>Alternative - Alternative Bias</td>
<td>The City has a bias for the Pacific Avenue alignment, and an independent review is necessary.</td>
</tr>
<tr>
<td>ALT-4</td>
<td>Alternative - New Beach “Cut and Cover”</td>
<td>Consider a new beach “cut and cover” alternative.</td>
</tr>
<tr>
<td>AQ-1</td>
<td>Air Quality - Odor</td>
<td>Will the project cause sewage odors?</td>
</tr>
<tr>
<td>BIO-1</td>
<td>Biology</td>
<td>What are the construction-related impacts to biological species such as the El Segundo Blue Butterfly, Least Tern, and California Brown Pelican?</td>
</tr>
<tr>
<td>CLI-1</td>
<td>Climate Change</td>
<td>Rising sea level and beach erosion need to be addressed.</td>
</tr>
<tr>
<td>CON-1</td>
<td>Construction - Parking</td>
<td>Where will construction equipment be parked during construction of the project?</td>
</tr>
<tr>
<td>Comment ID</td>
<td>Comment Name</td>
<td>Comment Description</td>
</tr>
<tr>
<td>------------</td>
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<td>--------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>CON-2</td>
<td>Construction - Schedule</td>
<td>Can the project construction schedule be met?</td>
</tr>
<tr>
<td>CON-3</td>
<td>Construction - Traffic</td>
<td>Which streets will be closed and how will traffic be impacted due to construction? Specifically, will the intersection of Pacific and Via Marina be closed during construction?</td>
</tr>
<tr>
<td>CON-4</td>
<td>Construction - Beach access</td>
<td>How will construction of the project impact beach access?</td>
</tr>
<tr>
<td>CON-5</td>
<td>Construction - Timing</td>
<td>What is the construction schedule and how much time will it take for project completion?</td>
</tr>
<tr>
<td>CON-6</td>
<td>Construction - Noise</td>
<td>What are the noise impacts due to construction?</td>
</tr>
<tr>
<td>CON-7</td>
<td>Construction - Management</td>
<td>How will construction practices and mitigation measures be enforced? Can financial penalties be imposed if the construction contractor fails to implement the mitigation measures?</td>
</tr>
<tr>
<td>CON-8</td>
<td>Construction - Vibration</td>
<td>What are the vibration impacts due to construction?</td>
</tr>
<tr>
<td>CON-9</td>
<td>Construction - Trench Covering</td>
<td>Add a “bullet item” requiring trench covering during construction of pipeline.</td>
</tr>
<tr>
<td>EIR-1</td>
<td>EIR - Recirculation</td>
<td>Recirculation of the EIR has been requested due to lack of sufficient analysis.</td>
</tr>
<tr>
<td>EIR-2</td>
<td>EIR - Extend Review Period</td>
<td>The review period for the EIR should be extended because of insufficient time to review the document.</td>
</tr>
<tr>
<td>EIR-3</td>
<td>EIR - Piecemeal CEQA Analysis</td>
<td>This is a piecemeal CEQA analysis of a larger project: 3-4 story development in Venice.</td>
</tr>
<tr>
<td>EIR-4</td>
<td>EIR - Mitigation Measures</td>
<td>Do not allow “or equivalent” mitigation measures.</td>
</tr>
<tr>
<td>EMG-1</td>
<td>Emergency Access</td>
<td>During construction of the project, how will emergency services be provided given street closures and construction on streets?</td>
</tr>
<tr>
<td>FLD-1</td>
<td>Flooding</td>
<td>How will the project handle storm water and other flooding events?</td>
</tr>
<tr>
<td>GEO-1</td>
<td>Geology - Settling/ Dewatering</td>
<td>Construction of the project may result in on- or off-site landslides.</td>
</tr>
<tr>
<td>GEO-2</td>
<td>Geology - Liquefaction</td>
<td>The project is being constructed in an area where liquefaction may occur.</td>
</tr>
<tr>
<td>GEO-3</td>
<td>Geology - Seismic</td>
<td>Seismic events may impact the project.</td>
</tr>
<tr>
<td>GRWTH-1</td>
<td>Growth Inducing Impacts</td>
<td>How will the project induce growth in the local area?</td>
</tr>
<tr>
<td>Comment ID</td>
<td>Comment Name</td>
<td>Comment Description</td>
</tr>
<tr>
<td>------------</td>
<td>--------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>GRWTH-2</td>
<td>Growth Inducing Impacts - Hyperion Plant</td>
<td>Can the Hyperion Plant handle the increased flows of the sewer line in addition to the large expansive housing projects that the City continues to approve?</td>
</tr>
<tr>
<td>NOI-1</td>
<td>Noise - Noise Curtain</td>
<td>Provide more specificity concerning the noise curtain mitigation measure.</td>
</tr>
<tr>
<td>NOI-2</td>
<td>Noise - New Mitigation Measure</td>
<td>Suggest new Noise mitigation measure, NOI-10, for Pacific Avenue project alignment.</td>
</tr>
<tr>
<td>OS-1</td>
<td>Open Space – Mitigation</td>
<td>Dedicate City owned drill site for public open space.</td>
</tr>
<tr>
<td>PRMT-1</td>
<td>Permitting</td>
<td>Several permits are necessary to proceed with the Pacific Avenue alignment.</td>
</tr>
<tr>
<td>PROJ-1</td>
<td>Project Related - Project Life</td>
<td>What is the lifespan of the project, and when will renovation of the project be required?</td>
</tr>
<tr>
<td>PROJ-2</td>
<td>Project Related - Capacity of Force Main</td>
<td>Is the pipeline adequate to serve the projected population?</td>
</tr>
<tr>
<td>PROJ-3</td>
<td>Project Related - Sewage Spill Plans</td>
<td>Will the project include plans for shutdown and containment in the event of sewage spill?</td>
</tr>
<tr>
<td>PROJ-4</td>
<td>Project Related - Sewer Capacity</td>
<td>Will the project release untreated sewage into the ocean during heavy rain?</td>
</tr>
<tr>
<td>PROJ-5</td>
<td>Project Related - Project Updates</td>
<td>Regular community updates of the project status are requested.</td>
</tr>
<tr>
<td>PROJ-6</td>
<td>Project Related - Safety</td>
<td>Which project alternative is the safest over the long-term?</td>
</tr>
<tr>
<td>PROJ-7</td>
<td>Project Related - Project Cost</td>
<td>Request more detailed project and alternatives cost information.</td>
</tr>
<tr>
<td>PROJ-8</td>
<td>Project Related - Impact to County Facilities</td>
<td>The project has the potential to impact Los Angeles County facilities.</td>
</tr>
<tr>
<td>TAX-1</td>
<td>Tax Reduction</td>
<td>Request tax reduction for property owners who are affected by project.</td>
</tr>
<tr>
<td>TRA-1</td>
<td>Traffic Impacts</td>
<td>Construction of the proposed project will cause disruption to the traffic flow in the area.</td>
</tr>
<tr>
<td>WQ-1</td>
<td>Water Quality</td>
<td>Is the pumping plant sending untreated sewage into the ocean; and will the plant adversely affect groundwater supply?</td>
</tr>
</tbody>
</table>
### Table 11-2: Comment Letters

| ALGN-1 | ALGN-2 | ALT-1 | ALT-2 | ALT-3 | ALT-4 | AQ-1 | BIO-1 | CLI-1 | CON-1 | CON-2 | CON-3 | CON-4 | CON-5 | CON-6 | CON-7 | CON-8 | CON-9 | EIR-1 | EIR-2 | EIR-3 | EIR-4 | EMG-1 | FLD-1 | GEO-1 | GEO-2 | GEO-3 | GRWTH-1 | GRWTH-2 | NOI-1 | NOI-2 | OS-1 | PRMT-1 | PROJ-1 | PROJ-2 | PROJ-3 | PROJ-4 | PROJ-5 | PROJ-6 | PROJ-7 | PROJ-8 | TAX-1 | TRA-1 | WQ-1 |
|--------|--------|-------|-------|-------|-------|------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
|        |        | ●     |       |       |       |     |       | ●     |       | ●     |       |     |       | ●     |       | ●     |       | ●     |       | ●     |       | ●     | ●     |       |       | ●     |       | ●     | ●     |       |●     |       |       |●     |       |       |       |       |       |       |       |       |
Table 11-3: Public Meeting Comments

| ALGN-1 | ALGN-2 | ALT-1 | ALT-2 | ALT-3 | ALT-4 | AQ-1 | BIO-1 | CLI-1 | CON-1 | CON-2 | CON-3 | CON-4 | CON-5 | CON-6 | CON-7 | CON-8 | CON-9 | EIR-1 | EIR-2 | EIR-3 | EIR-4 | EMG-1 | FLD-1 | GEO-1 | GEO-2 | GEO-3 | GRWTH-1 | GRWTH-2 | NOI-1 | NOI-2 | OS-1 | PRMT-1 | PROJ-1 | PROJ-2 | PROJ-3 | PROJ-4 | PROJ-5 | PROJ-6 | PROJ-7 | PROJ-8 | TAX-1 | TRA-1 | WQ-1 |
|--------|--------|-------|-------|-------|-------|------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
11.3 **Annotated Letters Received by the City on the Adequacy of the EIR**

February 22, 2006

Mr. James E. Doty
Los Angeles Bureau of Engineering
200 N. Spring Street, M165
Los Angeles, CA 90012

Dear Mr. Doty:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. This is a wastewater conveyance project to increase the capacity of the City’s sanitary sewer system by placing a new sewage pipeline in parallel with the existing force main that conveys flow from the Venice Pumping Plant to the Hyperion Treatment Plant.

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.

Any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommend that large size truck trips be limited to off-peak commute periods. In addition, a truck/traffic construction management plan is needed for this project. Thank you for the opportunity to have reviewed this project.

If you have any questions, please feel free to contact me at (213) 897-3747 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 060208AL.

Sincerely,

CHERYL J. POWELL
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

"Caltrans improves mobility across California"
Jim Doty  
City of Los Angeles  
Bureau of Engineering  
Department of Public Works  
650 South Spring St.  
Suite 11000  
Los Angeles, CA 90014-1918  

Subject: Draft EIR, Venice Pumping Plant Dual Force Main Project 2003031001  

Dear Mr. Doty,  

Staff of the California Coastal Commission would like to provide the following initial comments on the Venice Pumping Plant Dual Force Main Project. The project would replace an existing sewer main that connects the existing Venice pumping plant at Hurricane Avenue and the Grand Canal with the Hyperion Treatment Plant. The City has provided three alternative routes and three alternative methods of construction. The staff provided comments on the initial study several years ago. We understand that the various routes could be combined if the City found a combination of two routes would have less environmental impact.

In general, the staff agrees with the City's assessment of the risks and potential impacts of the various routes, with one exception. Placement of a major sewer line on the beach raises significant issues because, in a situation of rising sea level and increased coastal erosion, the sewer line could, in a few years be attacked by waves and require a revetment or other coastal protection structure. Section 30253 of the Coastal Act requires that new development shall minimize risks to life and property in areas of high geologic, flood and fire risk. New projects must be able to demonstrate that they have minimized risks over the foreseeable life of the development, which, for public works projects can be at least 30 to 40 years. During the next 30 to 40 years a combination of beach erosion and rising sea levels could result in the proposed line being within the wave run up zone and at great risk from both flooding and erosion hazards. Also, the Commission has found it becomes more and more difficult to establish new utility corridors through upland areas. As a result, even though the proposed sewer line may have only a 30- to 40-year expected life, the corridor itself may have a much longer expected life. Use of the beach route now, without any future plans to develop safer routes in the future, may greatly reduce options for safe and efficient management of sewer service in the future.

The City's assessment of the various routes needs to consider the safety of the sewer line under the worst case conditions that can be foreseen for the proposed sewer line. For the beach route, that would be a 100-year storm event (similar to the 1982-83 storms, or the 1983 storms), occurring when the beach is eroded due to both seasonal beach loss and long-term erosion, and when the oceanic conditions are most conducive to wave impacts and scour (a combination of high tide, atmospheric forcing and long-term sea level rise). Since the long-term beach change has been influenced of historic beach nourishment, the beach conditions should be extrapolated for both conditions of continued beach
nourishment and conditions of no additional nourishment. Key points of vulnerability to the line should be considered, such as the higher elevation portions of the line, the channel crossing and transitions to the crossing, and situations where the line may have little or no flow and thus could be excessively buoyant. Also, the sewer line is a critical facility and it should be examined for risk from some extreme events, such as a tsunami with drawdown that would likely be focused in the channel area.

In addition to potential risks from beach erosion, staff would want the EIR to consider fully the following potential impacts that can result from construction, maintenance, or routine operation:

1) Impacts on beach access. The three proposed routes are along roads that are used for beach access or are located on the beach. Several staging areas are located on the sand or in the case the Marquessas/Via Marina route on a public parking lot. Methods of construction which require long term closing of beach access routes or occupancy of recreation areas will reduce the ability of the public to get to the beach. The beach and recreation areas in question are:
   a) Dockweiler State Beach (both north and south of the Marina Entrance channel)
   b) The County parking spaces adjacent to the Marina Entrance Channel at the southern ends of Pacific Avenue and Via Marina.
   c) County Parking Lot 13 located on Via Marina.
   d) Pacific Avenue in both Venice and Playa del Rey
   e) Vista del Mar Boulevard, which provides principal access to Dockweiler State Beach.

2) Impacts on the Least Tern nesting colony. The staging area shown for the Venice Beach small diameter tunnel is located close to the Least Tern nesting area. We would be concerned about impacts of noise and foot traffic on this site.

3) Visual and noise impacts during construction. While such impacts are temporary, the level of impact varies among the methods chosen for construction and the location of the route chosen. The Marquessas/Via Marina route would have little impact on beach views or on major public access routes. All of the alternatives in Playa del Rey would have impacts. The tunneling alternatives would seem from your analysis to have the least impact on beach access routes.

4) Water quality impacts can potentially occur with any major construction project; it will be necessary to design and schedule the project to minimize potential water quality impacts, require the use of Best Management Practices as well as to impose strict mitigation measures.

5) All three routes would traverse liquefiable soils. This geologic hazard needs to be considered in the analysis of all route and construction alternatives.
6) Plans for shut-off and containment in the event of a sewerage spill should be provided for each proposed route. Special care should be taken for the channel crossing areas less than 100 feet from Ballona and Del Rey Lagoons, and with the entire beach route.

7) There is some finite life to all sewer projects. There should be some consideration in the EIR as to the eventual disposal of the sewer line once it reaches the end of its economic life. While staff is not recommending the beach route alternative, should the City choose this alternative, there should be some identified triggers that would provide sufficient time to plan, finance and construct a replacement line before the beach line would be threatened. Triggers indicative of a future need to replace the line or to install shore protection to avoid damage from wave attack include beach width change, increased damage during storm conditions, or back beach elevation changes.

Some of the impacts may be mitigated either by locally imposed mitigation measures, or by special conditions imposed by local government or the Coastal Commission. However, coastal staff would urge the City to choose a route and a construction method that 1) avoids the beach, 2) minimizes disruption of public access to and use of the beach and other coastal recreation resources, 3) and does not disturb the Least Tern nesting area during nesting season (mid-March to late August).

When the final project is submitted to the Commission for a coastal development permit, the staff will undertake a more thorough analysis, and if necessary, impose special conditions to assure its consistency with the California Coastal Act. Thank you for allowing us the opportunity to comment on this project at the early stages of planning.

Sincerely

Pam Emerson
Los Angeles Area Supervisor
Mr. James E. Doty  
City of Los Angeles  
Public Works Engineering  
c/o Public Affairs Office  
200 North Spring Street, Room M105  
Los Angeles, CA 90012

Dear Mr. Doty:

REVIEW OF DRAFT ENVIRONMENTAL IMPACT REPORT
VENICE PUMPING PLANT DUAL FORCE MAIN PROJECT
CITY OF LOS ANGELES

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the Venice Pumping Plant Dual Force Main project. Based on the DEIR, this project has the potential to impact Los Angeles County facilities. Specifically, we are concerned that two of the proposed alignments could have significant construction related impacts to County residents, roadways, and facilities. Public Works recommends considering the Pacific Avenue alignment as the preferred alignment since it creates the least amount of impact to the County.

Also, it should be noted that any operational impacts to the County infrastructure will need to be reviewed and permitted by Public Works.

If you have any questions regarding these comments, please contact Ms. Clarice Nash at (626) 456-5310.

Very truly yours,

DONALD L. WOLFE  
Director of Public Works

ROSSANA D'ANTONIO  
Assistant Division Engineer  
Land Development Division

CRN:jmw@l Acres/URS/DESP/DEIR
From: Brett Hawkins <brett@qgl.com>
To: <environment@env.lacity.org>
Date: Thu, Feb 9, 2006 11:36 AM
Subject: Venice Dual Force Main

I'm all for getting this overflow and repair problem fixed!

Thanks,

Brett W. Hawkins Jr.
President & Founder
Global Gaming League
+1 310 828 5252
"Stop Playing With Yourself!"
www.GGL.com
127 Rees Street
Playa del Rey, Ca. 90293
Feb. 20, 2006

Dear James Doty, Environmental Group
L A City Public Works

Re: Venice Pumping Plant Force Main Project EIR

I want to compliment you and the staff. I have read the entire EIR. You were very thorough!!

I am supporting the route which I believe is described in the EIR, but I feel that it should be put in writing so that there is no confusion. Using Fig. 6.3-1 I want to support the most straightforward way to complete the project. Begin at #11 go west to #10, west to #9 and south to #6 cross under Marina channel, under Ballone Creek to #5 continue on the beach tunneling to #1 east to #3 south to #2 and tie into Hyperion plant.

The route I support would use the Lay down areas to store equipment in the existing parking area adjacent 62nd Ave. and the parking east of Pacific in the Lagoon area.

The Lagoon and Jungle areas of Playa del Rey can not FUNCTION if the roads are reduced. Using the beach for tunneling will disrupt the least of local Residents. We all lived with the Thompson Pumping Plant Fiasco in 1998!!! We can not and will not live with or through another Public Works Project that is not neighborhood friendly. We come before the Least Term or any other bird or lower species!!!

The original 1958 pipe is laid in the beach. The new pipe can be laid next to or in close proximity employing tunneling or open trench method. Traffic disruption would be of a minimum. The Dockweiler (North and South) Alignment would eliminate traffic and parking issues as described for the "Pacific And Vista del Mar" inland route. The residents should not have to live with the negative
impacts associated with a project of this magnitude. Please put the project on the beach for as much as is possible.

By using the beach route, the pipes can be tied together for future use. As the demand increases, both pipes can be used. If there is a big storm, the old pipe can be used so that "nasty" spillage does not wash down our beaches.

By using the beach route, the parking in the Lagoon would be preserved for those using the Park, Basketball courts or Grand Parents attending Little League games, and residents who do not have a garage. Parking is at a premium and must be maintained at the current level.

Please note that we recognize the need for the project. We want to maintain the current quality of life. The ingress and egress for residents, businesses and LAPD and LAFD, and Lifeguards’ equipment during the short 18-24 month project. The beach route would be further away from the bluffs along Vista del Mar. Vibrations from equipment could trigger land slides. The hill properties to the immediate east of Vista del Mar and those in the Jungle to the immediate west of Vista del Mar appear on the City Earthquake maps as being in a liquefaction zone. The project could potentially result in on or off site slides, lateral spreading, liquefaction or collapse. Good planning and engineering can not predict a landslide. The La Conchita, in Ventura, 2005 and The June, 2005, Blue Bird Canyon, La Guna Beach Slides give us all reason to pause and plan very carefully. Planning is the key. Does The City have enough Liability Insurance to cover similar happenings??? The seismic shaking and vibrations would be greatly reduced if the Beach route were used.

Throughout the EIR there were references to moving equipment and workers. Arrangements could be made with LA City for workers to park at empty areas along Pershing or open the section of Sandpiper that was shut off after the 2001 Terrorists attacks. The Sand Piper area could be used for parking and a shuttle bus could run employees as needed. LA County operates parking on the west side of Vista del Mar slightly south of Waterview-Napoleon. There are
County lots in the Marina that could be used for workers. The parking in Venice, Marina and Playa del Rey is precious. Careful consideration should be given to ways to preserve parking in all areas affected!!!

To make it very clear—The Jungle is a high density residential area. The parking area located westerly adjacent Vista del Mar, from Montreal South to Surf Alley can not be used in any manner at any time during this project. This area allows Beach access for visitors during the day and provides residential parking in the evening.

I would like to suggest that this Project have an ongoing update bi-weekly in The Argonaut Newspaper. This is a local free paper that is widely read in the affected area. Additionally, Before the Project really starts, A community meeting should be held at the Council office at night so that the last minute changes could be made public. The LAPD, LAFD, Lifeguards, and local hospital should be invited.

Representatives of West Beach Playa del Rey Property Owners Association will be available to meet with you at night with some notice.

Lastly, Contingency plans must be in place so that our Community does not live through a repeat of the Thompson Pumping Plant fiasco. The City owes this neighborhood a well planned project without any glitches.

Sincerely,

Carol Kapp
Property Owner, Board of directors WB PdR POA
From: Gene Haberman <genehab@yahoo.com>
To: <environment@eng.lacity.org>
Date: Tue, Mar 7, 2006 5:20 PM

Dear Mr. Docy,

I am a Marina del Rey resident involved in reviewing a Draft EIR on the Shores Project proposed to be built on Via Marina, North of Marquessa Way. Over 300 additional residential units are being proposed. It is part of over 2000 residential units now being built or in the planning cycle on the west side of the Marina. Are these units served by the Venice Pumping Plant?

If they are served by the VPP is there enough capacity. The reason for my concern is the information you furnished regarding the proposed Venice Pumping Plant Dual Force Main Sewer appears to indicate that the sewer system is over capacity during wet weather. Therefore you are proposing to add a sewer to ensure continuous safe flow during projected wet weather and to help prevent sewer spillage onto city streets and adjacent surface waters. Based on information from your office, the sewer would be completed in 2011. The Shores Project, if approved, would begin occupancy in 2008. Some of the other additional residential units are currently under construction.

Please answer this inquiry at your earliest convenience. The Shores Project is in the Regional Planning Commission hearing process.

Thanks you.

Sincerely,

Eugene Haberman

Marina del Rey
JOHN B. KILROY

March 14, 2006

Attn: James E. Doty  
City of Los Angeles  
Department of Public Works Bureau of Engineering  
c/o Public Affairs Office  
200 N. Spring Street  
Room M165  
Los Angeles, CA 90012

Re: Draft EIR — Venice Pumping Plant Dual Force Main

The matter of this Dual Force Main has previously been discussed with the Department of Public Works in writing and verbally in the 2002 and 2003 period — during public hearings and private meetings.

We call to your attention such correspondence which should be on file with the City of Los Angeles Department of Public Works and also enclose letters from Marina Peninsula Neighborhood Association to the following dated April 9, 2003:

- Mr. Christopher Westhoff, City Attorney’s Office, City of Los Angeles
- Councilwoman Cindy Miscikowski, City of Los Angeles, District 11
- Mr. Vitaly Troyan, City Engineer, City of Los Angeles
- Commissioner Ronald Loz, Dept. of Public Works, City of Los Angeles
- Russell Ruffing, Department of Public Works, City of Los Angeles

These letters and other letters from Marina Peninsula Neighborhood Association and the undersigned, John B. Kilroy, provided foundational documents, facts and objections to installation of such a Dual Force Main on Pacific Avenue.

5306 PACIFIC AVE.  
MARINA DEL REY, CA 90292  
JBMKR @ AOL.COM
A current review of Pacific Avenue shows the following additional facts which would have tremendous impact upon construction cost, construction time, traffic flow and the standard of living and convenience of all owners and renters within the area from the Canal to the Ocean Beach.

The count of driveways which enter off Pacific Avenue to single-family or multi-family residence totals 38.

The count of streets which enter Pacific Avenue between Galileo Street to Via Marina totals 18. These streets serve hundreds of more driveways which primarily are multi-family home driveways and the driveways on Pacific Avenue represent residences with underground sewer, water, gas, cable and other services, all of which interfere with rapid construction, substantially increasing cost of such a Dual Force Main.

Pacific Avenue is the primary access street to Speedway, which also serves hundreds of residences, garages and related parking with underground installation.

Pacific Avenue is a loop access road to Washington Boulevard and Via Marina for buses, school buses, trucks, service vessels and cars, heavily used during daylight hours.

A review and study of the impositions and traffic flow will significantly interrupt access and living conditions should construction be considered on Pacific Avenue, as well as substantially increasing cost and construction time.

Neither the Via Marina proposed site nor the proposed beach installation impose such adverse or costly installation upon the residents and upon the construction itself for such a lengthy time as Pacific Avenue.

There are virtually no obstructions to rapid and low-cost construction, nor is there such a serious potential and likely problem of liquefaction as there is on Pacific Avenue.

Contrary to prior presentation by a consultant to the City, the width of the bench at this area for a sewer line has been accretive for many years since installation of the breakwater and erosion is highly unlikely. Environmentally, there should be only a temporary construction impact, much less than the Pacific Avenue site.

5306 PACIFIC AVE.
MARINA DEL REY, CA 90292
JBKMDR@AOL.COM
March 14, 2006

The Via Marina site is also a highly favorable site as compared to Pacific Avenue, a short tunnel under the canal, a short distance on Via Dolce, then along the south two-lane of a four-lane divided roadway with no driveways to multi-family dwellings, and little, if any, sewer connections, water lines, telephone, gas or other lines obstructing rapid and low-cost construction along the south side of Via Marina.

Traffic management on the Via Marina four-lane divided roadway is relatively easy, particularly in view of the lack of driveways, garages, and utilities obstructive to high speed construction.

It is simply illogical, structurally unsafe, with a high increase of cost in money and time to consider Pacific Avenue as a site for the Venice Plant Dual Force Main.

All of this is aside from the tremendous imposition upon living and environmental conditions during construction of Pacific Avenue if selected as the construction site.

Sincerely,

[Signature]

Jesse B. (Jim) Kilroy

cc: Mark VanGetzel
    Commissioner Ronald Low, Dept. of Public Works
    Cynthia Miutkowski, City of Los Angeles District 11
    John S. Perkins
    Russell Ruffing, Bureau of Engineering
    Al Sackler
    Lowell Saffir, MFNA President
    Vidal Trosky, City Engineer
    Christopher Wesheff, City Attorney

5306 PACIFIC AVE.
MARINA DEL REY, CA 90292
JBKMDR@AOL.COM
Marina Peninsula Neighborhood Association

April 9, 2003

Mr. Vitali Troyan, City Engineer
Lead City Agency
City of Los Angeles
Bureau of Engineering
650 S. Spring Street, Rm 574
Los Angeles, CA 90014
Attn: Russell Ruffing

Re: Venice Pumping Plant-Dual Force Main
1. CEQA – Notice of Preparation
3. Attachment – Issues: Pages 5 – 17 inclusive

Dear Mr. Troyan:

We have received the attached documents and have studied the City’s proposed responses to the Issues Section in detail.

Proposed Routes for EIR
To date, we are aware of five proposed locations for the construction of the Venice Pumping Plant Dual Force Main. These are listed below with the source of the information:

Community News Bulletin – October 2002
1. Pacific Avenue Alternative – Preferred by the City and apparently the subject of considerable effort by the Public Works Department having prepared detailed and possibly final plans for placement. Also, the route used as the basis of the Initial Study baseline dated 25 February, 2003.

2. Beach Alternative – Alignment near the existing Force Main on Venice Beach. Apparently rejected by the City due to some potential Coastal Commission requirements. This route is preferred and supported by numerous local residents.

Community Meeting at the Marriot Hotel – 15 October 2002
3. Alternative #1 – Presented in a vu-graph presentation as a route around the Marina staying completely on Los Angeles City right of way. Rejected by the Public Works Department as technically unsound due to pressure drops in the sewer line without the construction of additional pump stations.

4. Alternative #2 – Presented in a vu-graph presentation as a route second round around the Marina staying completely on Los Angeles City right of way. Rejected by the Public Works Department as technically unsound

11 Mast Street
Marina del Rey, CA 90292
due to pressure drops in the sewer line without the construction of additional pump stations.

Letter to Commissioner Low from John Perkins – 27 November 2002

5. Via Marina Alternative – Proposed as a solution that would be less disruptive to Marina traffic, may be shorter in total length, would allow more rapid completion, and possibly less expensive.

We believe another location should also be considered. That the proposed force main be constructed by micro tunneling below the right of way of the Ballona Lagoon Canal. The canal is immediately adjacent to the pumping plant and extends to the Marina del Rey Channel.

We believe that either the beach location or the canal location provides the least disruptive location, the safest locations; and the most environmentally sound locations, and the lowest cost locations. Further, that the Via Marina location is the third most responsible location and the Pacific Avenue location is the most disruptive, the most costly, the worst environmentally, as well as exposing the City to the greatest potential for serious ongoing liability in connection with vibration damage to homes and other issues.

For the purpose of the Initial Study, we believe that the staff should be directed to prepare the study around four of the above named routes. These are:

1. Ballona Lagoon Micro Tunnel Alternative
2. Beach Alternative
3. Pacific Avenue Alternative
4. Via Marina Alternative

Impartial Objective Study

As we read the documents provided, it is obvious that the City has a strong bias toward the Pacific Avenue designed installation. It is also obvious that the answers provided are, in many cases, incorrect and misrepresented known facts.

The City has prepared final or near final plans for the Pacific Avenue Alternative. It is customary that the design team for such near final or final plans be restricted from involvement in the CEQA process due to the probability of bias towards their design.

We believe that such bias is clearly evident. We recommend a new team be assigned to complete the EIR.

We also recommend that a qualified independent Oversight Board be formed to assure that such bias does not continue.

Clarity of Initial Study Matrix/EIR Report

Further, it is impossible to set forth specifically related issues for each proposed location in the single format proposed by the City.
Mr. Vitaly Troyan
Page 3 of 3

A response by the City to specific issues for each of the four proposed locations should be provided. This is essential for an equitable determination of the respective benefits and liabilities for each location. We have attached a marked up copy of the issues sections, which more clearly represents appropriate responses to the issues.

We again emphasize the importance of accuracy and facts and that a separate list of issues and responses should be prepared for each proposed location.

**Recommendations**
In summary, we request that you assure:

1. the routes to be studied are specifically identified
2. the assignment unbiased staff to prepare the EIR
3. Form an Independent Oversight Board to assure a bias free study
4. Prepare a specific issues study for each site

We look forward to your response. Thank you for your cooperation.

Sincerely,
Marina Peninsula Neighborhood Association

Lowell Safire, President

John B. Killey
5306 Pacific Ave.
MDR, CA 90239

Mark VanGessel

John S. Perkins

Al Sackler

Cc: Cindy Miscikowski, City of Los Angeles District 11
Commissioner Ronald Low, Dept. of Public Works, City of Los Angeles
Russell Ruffing, Bureau of Engineering, Environmental Group, City of Los Angeles
Christopher Westhoff, City Attorney, City of Los Angeles
27 November 2002

Commissioner Ronald Low
City of Los Angeles
Board of Public Works
200 North Spring Street, Suite 361
Los Angeles, CA, 90012

RE: Venice Dual Force Main Project

Dear Commissioner Low:

The purpose of this letter is to make sure that you are aware that other reasonable alternatives exist for the Venice Dual Force Main Project other than those currently proposed and that the additional alternatives are explored prior to submission to the community for comment.

I am a Marina del Rey Peninsula community resident and attended the 15 October 2002 meeting held in the Marina del Rey Courtyard of Marriott Hotel. At the conclusion of that meeting I discussed another alternative with the City's Project Manager, Sean Zayed, in addition to the four alternatives he presented.

The Alternative (Reference Attachment 1)

Instead of exiting the existing pumping station and going west on Hurricane, I would suggest that the sewer line should go east, under the small canal and then cross Via Dolce and continue along Marquesas Way. It would then turn south and run under the west side of Via Marina to the channel. From there it could continue across and run on the east side of the currently developed area, or turn and follow either of the two plans presented for crossing the channel in this area.

While the construction along Via Marina would be on County right-of-way, instead of solely in the City, the County should be able to support this path since the sewer carries waste from the marina area (i.e. County property). Some of the benefits of this alternate route are:

- The disruption of traffic on the peninsula would be greatly reduced.
- Residences on the west side of Via Dolce do not front on the street. Access to the properties is from other streets, in contrast to the numerous residences on Hurricane and Pacific Avenue whose front doors and driveways are on the street.
- The divided roadway of Via Marina would allow the project to be accelerated while still allowing two way travel along the east side of the road while each of the four major sections of road were under construction. This area also affords alternative streets for residents to leave the area.
Attachment 2: View West across empty lot, small channel and down Hurricane.
(Currently proposed route).

Venice Pump Station across channel on left.
Attachment 3: View East across Via Dolce down Marquesas Way.
Venice Pumping Plant: Dual Force Main Project.

Observations:

The peak flows to the Venice Pumping Plant exceeding its capacity is a result of poor City planning; allowing large expensive housing developments prior to having the required infrastructure in-place.

All large expensive housing developments should be put on hold (stopped) until the infrastructure is in-place that can support the increased capacity they require. These large housing developments should provide significant funds with upfront payments to the City for expansion of existing infrastructure. Current tax-payers should only be responsible for repairing and maintaining original infrastructure.

The proposed project for expanding the capacity of the pipeline will not resolve the larger problem; the Hyperion Sewerage Treatment Plant is currently unable to deal with the increasing capacity, which has already resulted in untreated waste being released into the sea in 'emergency situations'.

Comments:

1. Firstly, it is important to reconsider the benefits for existing residents and tax-payers for a 'No Action Alternative'.

2. In the event that a second pipe line is installed as a condominium homeowner, located on Pacific Ave., I favor the Dockweiler Beach alternative being used as the construction site for south of the Marina Inlet. This choice will reduce the impact and risks to both homeowners and properties. The Draft EIR understates the impact and the major risk to properties, which is the potential for damage to property foundations e.g. impacts, subsidence, and vibration. The Dockweiler Beach alternative reduces health hazards, dust, etc. and the potential interruption of utility services, which occurs when a channel, or tunnel construction is in the streets e.g. Pacific Ave. This alternative is far safer for the general public and will have the least negative affect for accessing the area, e.g. emergency services.

3. The Draft Report refers to potential impacts to recreational facilities and public events on the beachfront, however, the Dockweiler Beach alternative for south of Marina Inlet:
e) Only impacts a mile of beachfront and bike path - we have many, many more miles of beaches and bike paths available for our recreation.

b) Will allow normal use by the general public of the recreational facilities in the Playa Del Rey Lagoon Park (parks, barbeques, basketball court, baseball park, etc.).

c) This alternative has the least negative effect for residents and the general public with fewer street closures, lower noise, lower vibration and allows for better residential access and emergency access during the construction period.

4. RE: Operation of Construction equipment, Equipment laydown, Construction Workers parking, Dust containment, Safety.

a) Strong Contract terms should be used to control how the construction company operations are undertaken and managed, thereby to ensure the least amount of disturbance to local residents. Special Assessments (fines) should be applied for violations by the construction company, or its workers.

b) Trucks carrying loose materials, sand, dirt, etc. should be required to use covers.

c) There are many unused roadways, near Sandpiper Street, which should be made available for construction workers parking, equipment laydown, etc. this will help avoid our local streets becoming choked by construction vehicles and equipment.

Thank you for your considerations,

Don Hollands: 310 366 8522. 
NOA - Laguna Del Mar Assn Inc.

6400 Pacific Ave. #304, Playa Del Rey, CA 90293.
From: "mark van gessel" <vangessel@comcast.net>
To: <environment@eng.lacity.org>, <carol.armstrong@lacity.org>, <jim.doty@lacity.org>
Date: 3/16/2006 8:56:08 PM
Subject: Venice Dual Force Main - Comments to the EIR

Attached are my comments on the Venice Dual Force Main project.

Sincerely

Mark Van Gessel
Mark Van Gessel's Comments on Dual Force Main EIR

Comments to EIR

1. General Comment
   a. In the alignment for the North area (north of Marina channel to pumping plant) you are showing the following alignments:
      i. Deep Tunnel Pacific
      ii. Deep Tunnel Beach
      iii. Cut and Cover Pacific
      iv. Cut and Cover Marquisesa
   b. You should have a cut and Beach alignment
   c. Below is my opinion on alignments when considering all the factors (environment, money, impacts, time, feasibility) in order:
      i. Cut and cover beach
      ii. Cut and cover Marquisesa
      iii. Cut and cover Pacific
      iv. Deep Tunnel Beach
      v. Deep Tunnel pacific

2. The EIR is a very large document (with appendices) it is several 3 inch 3 ring binders. The law requires a minimum review period, which is what you are providing. It took the City over 1 year on a fulltime basis to write this document and the City is only providing a very short (minimum) review period. The City should not use the minimum duration for such a large project.
   a. I request that the City extend the review period to allow enough time to review the entire package.

3. Add to list shown in 1.8
   • Impacts to structures and the permanent settlement of ground due to dewatering
   • Access to homes if cut and cover is the chosen method of construction on the Venice peninsual

4. In 2.2 Please clarify that the VPP has never had a spill due to capacity issues.

5. In 2.2 please clarify that the VPP has been upgraded over the years so that the pumping capacity now exceeds the pipe capacity.
   a. As part of the EIR the EIR should provide a detailed analysis of the number of times that the VPP is anticipated to exceed the capacity of the pipe so that people can have a realistic understanding of the damage that can be done to the environment.
   b. It should also be made very clear that the plant was near (but never release wastewater) releasing wastewater in 1992 and 2004 that the wastewater was very diluted compared to normal wastewater.
   c. Please also clarify if other City sewage facilities released wastewater during those storms. This is critical in evaluating the no-build option. If the report shows that all that would happen is that the increased capacity would just pump most wastewater to a facility that then does not have the capacity all one has done is shift the problem and not really solved it. If anything one also created a large problem by concentrating and increasing the wastewater discharge.
6. In 2.3 (Page 2-9) the cut and cover construction. The construction duration is to short for construction on Pacific the duration would more in the range of 14 to 18 months.
   a. For a detailed discussion please see other sections of comments.

7. In 2.3 (Page 2-9) under starter tunnel
   a. Please revise the sentence regarding acoustic curtain. To read
      i. “To minimize the transmission of noise, the contract will require
         the installation of an acoustical curtain that is at least 25 feet high
         and surrounds the entire site, and be closed when any construction
         activities occur.”

8. In 2.3.1 Project alternatives:
   a. Why is the cut and cover not a feasible alternative for the beachfront areas
      is a feasible alternative for the street alignment?
   b. By not including a cut and cover construction method for the beachfront
      alternative you are not providing an alternative that may be the least
      environmentally friendly and cost effective.
   c. If the initial construction used to build the 48“ line was a cut and cover
      construction method what has changed to make that construction method
      not viable.
   d. I also believe that when the project was first proposed (several years ago)
      the construction method for the beach alternative was a cut and cover.
      The City speaker at the time said that they were refusing to consider the
      beach alternative because they did not want to deal with the coastal
      commission.
   e. A cut and cover alternative on the beach would be a more environmentally
      friendly and cost effective solution than the street alternative for the Venice
      peninsula portion of the project.
   f. Please make a clear chart showing the options so they can easily be
      understood. Since the chart shown in the presentation that showed all
      the 6 alternatives. This gets expanded since the cut and cover beach
      alternative should be included.

9. In 4.1.1 –
   a. The estimated durations are to short. After 80 feet of trench is opened the
      mud mat is placed. That has to cure (several days) than the gravel bedding
      is placed (this is at least a 2 day process. 1 day to place another day to set
      grade and compact. The backfill process again is several days (at least a
      week) especially since there is no adjacent property to store any
      material and trucks have to work only from one end not along the side of
      the trench. There is no time for installing the shoring. There is no time
      for removing the shoring. You also have no inspection time by City
      inspection forces. City has to inspect bottom of trench (1Day) City has to
      inspect mud slab (1 day) City has to inspect gravel bed (1 day). Once the
      trench is backfilled you have to make sub-grade City has to inspect. City
      requires that back can only be in 8" lifts so that takes time. Then the AC
      has to be placed and the City has to inspect. You are requiring the street
      to be paved in very short sections and this is very time consuming.
Mark Van Gessel’s
Comments on Dual Force Main EIR

b. The production rate should be in the range of 10 feet a day or less. That would equate to approximately 500 working days or 700 calendar days (1.92 years). I am civil engineer with over 10 years in pipeline design and construction and believe that my estimate is very accurate. I could be considered expert witness on the subject. I can go over your detailed work schedule if necessary.

c. The other street construction alignment Marquez / Via Marina way I believe is longer than necessary. This area has a larger street and can allow construction access adjacent to the trench making construction quicker and easier and cheaper.

10. In section 4 page 4-5 you provide cost estimates. In order to have a public process on the cost estimates detailed information on how the costs were arrived at need to be included. Please provide a detailed cost estimate for each alignment so the costs can be publicly discussed.

a. More detailed costs analysis of all alignments are required as part of the EIR in order for the public to comment properly. Please provide.

b. You show the Marquez way/Via Marina way alignment having the same cost as the Pacific Avenue alignment. This is not correct. From a simple oversight review and a ROM estimate the Marquez way alignment is more expensive than the Pacific Alignment by at least 15%. Please provide the detailed backup data so that I can show where you are off in the estimate.

c. There is no cost estimate for a cut and cover alignment along the beach. In the revised document this needs to be include. From a ROM estimate the cut and beach alignment should be less expensive than the Pacific avenue alignment.

11. I believe that the Marine del Rey and also the beach alignment (cut and cover) would be less costly than the Pacific Avenue alignment.

12. In the cut and cover alignment along Pacific Avenue you should discuss that the pipeline would require the shutting down of the corner of Pacific and Via Marina. In a previous detailed review the plans that have been generated for this alignment I held a meeting and showed the City staff that this alignment would have to shut down the street in order for it to be completed. I can have a meeting to go over this. Also the Bus or large vehicle traffic (Moving van or other large trucks) will not be able to make the turn when the pipeline is constructed in this area. Fire trucks would also not be able to make the turn when the pipe is under construction at this location. It is anticipated that this construction would be for at least 1 month if not longer.

a. I have not seen the fire department comment on this issue. The Fire Department should be contacted about this issue if this alignment is taken and have input on construction and access restrictions.

b. In the event that a fire occurs in the neighborhood and fire response is limited and extra damage occurs would the City pick up the additional cost?
c. The contractor should be required to post signs at specific locations coordinated with the communities that large vehicles can not exit and make the turn at Pacific and Via Marina.

13. Previously mentioned in the past public hearing prior to the City realizing an EIR was required it was discussed that if the beach alignment was chosen additional costs and improvements to the area would have to be incurred driving up costs. Other City department should not impose additional unnecessary improvements to one alignment and not the others this appear to make the City look as if they are forcing one alignment to be chosen over another. If other city departments or agencies are requesting improvements for one alignment over another such improvements should be required for all alignments.

14. On page 4-6
   a. All construction durations appear short could the person have converted working days directly into calendar days. Meaning 5 working days = 1 calendar week. Unless the City plans on having this work be performed 7 days a week and that is not stated in the EIR.
   b. The duration of Hurricane to Pacific 3 weeks in short it should be at least 9 weeks.
   c. The length of the Pacific alignment is approximately 5,000
   d. The duration for the Pacific alignment is to short and should be 95 weeks based upon the restriction you state in the EIR

15. On Page 4-6
   a. Please detail which are receiving pits and which are the tunneling shafts.

16. In 5-1 (page 5-1) you state that there are no significant environmental impacts once this project is built. This needs to be revised.
   a. If you built the Pacific avenue alignment that alignment has numerous air vacuum valves. These valves will release trapped air from the system into the environment. The air from sewage has methane and hydrogen sulfide in it and also other gases with odors. The wind pattern will have these vapors go immediately into the air of the Ballona reserve. This could impact the wildlife. The air could also impact the residents in the area as smell and gas.
   b. Please revise the EIR to state that there permanent environmental impacts for the Pacific avenue alignment.
   c. The Marquesas / Via Marina way alignment can be placed deeper and there are less pipes and other utilities to cross. The marquesas alignment may not require any air/vac valves but if it does they would be less and not impact the wildlife reserve.

17. On page 5-128 you provide clear mitigation measures.
18. Please include similar bullets for other sections:
   a. Vibration
      i. Have a clear vibration specification similar to MTA’s vibration specification (see attached)
      ii. Have the Contractor assessed (see attached language) damages if he exceeds the vibration limits
      iii. For the Pacific alignment please have a detailed vibration limit specification.
   b. For other areas such as dust and operation hours have clear bullet points that he is required to meet
      i. Operation hours. As stated in the meeting for the Pacific avenue alignment:
         1. No excavation prior to 10:00 am
         2. No plate removal of open trenches prior to 10:00 am
         3. All trenches shall be plated at end of the shift and then open to evening and morning traffic
         4. All excavation shall stop by 5:00 pm.
      ii. These were verbal statements made during the presentation regarding the Pacific avenue alignment. Please incorporate these as bullet items in the EIR so that the community will be assured that if the Pacific avenue alignment is chosen these are part of the contract.
         iii. Please include special assessment language (see attached) if the above items are not adhered to by the contractor.
   c. There is no discussion on the dewatering and settlement of adjacent homes for the Pacific avenue alignment. Please expand on this issue on the previous documents it stated that dewatering is required to build the Pacific avenue alignment and that settlement is likely with dewatering.

19. In the EIR for the Marquesas / Via Marina way alignment you require that a tunnel be required to cross the canal.
   a. In order to allow for easy of construction the EIR should allow this to be open cut with a requirement that the contractor should not impact the water flow. The contractor could construct an out and cover and divert the water around the excavation. This would allow the construction contractor alternatives and help reduce costs.

20. I believe that the Venice coastal specific plan and/or the Venice Land use Plan shows the building at Ironside (building shaped like a ship, is a historic building. The Pacific avenue alignment could damage that building. Neither the beach alignment or the Marquesas alignment would impact that building during construction.
Mark Van Gessel's
Comments on Dual Force Main EIR

21. For the Pacific avenue alignment at Pacific and Via Marina (page 5-43) you assume that jacking will be the construction method used to avoid traffic.
   a. Jack is not feasible for this portion of the alignment. In previous meeting (2002) on the Pacific avenue alignment the city engineering group conceded that the corner area of Pacific and Via Marina would have to be completely closed to make the pipe turn. This would have to be an open cut construction. This would greatly impact traffic and access.
   b. For a period of time (weeks) no access be allowed through Pacific and Via Marina.
   c. Please revise and discuss in detail this impact.
      i. Please get specific input from fire department regarding this
      ii. Please get specific input from the police department regarding this
      iii. Please get specific input from the MTA regarding bus routes
      iv. Please get specific input from the City Transit system (Express service) regarding this.
   d. If your response is that this corner will not be closed a detailed meeting is required to explain what changed from 2002.
   e. If you hold that can be constructed without closing the corner, please make is a specific bullet item in the EIR and state that if a construction breaks such a rule they will get assessed damages for closing the corner.

22. For the Pacific alignment please include in the EIR that you have resident parking only in the neighborhood during construction to make it possible for residents to park due to all the parking that is being removed during construction. Please see page 5-43 where you discuss all the parking you are temporarily removing to build this alignment.
   a. If the Beach or the Marquesas alignment is chosen this is not an issue, since those alignments do not impact parking.

23. On page 5-126:
   a. NOI-8 This is not adequate for any alignment. This should be revised to read:
      i. "The contractor shall have detailed noise specification which will provide maximum noise levels (instantaneous and 8 hour averages) Violations of the contract shall result in monetary assessments to the Contractor."
   b. Add a NOI-16 for Pacific avenue alignment
      i. "Truck hauling shall start no earlier than 9:00 am and end no later than 3:00 pm
      ii. Truck hauling shall be limited to Monday through Friday.
      iii. Truck staging shall not occur on the Marina Peninsula
      iv. Only 2 trucks may be permitted on the project site at one time. A in the operation of being filled or depositing material and a truck preparing for such operation.
      v. A contract clause shall be included in the construction contract that each item above that is not complied to, each time, shall be special assessment to the contractor.
24. On page 5-129
   a. Add similar bullets for vibration like on the previous page
   b. For the Pacific avenue alignment please revise the EIR to allow the community to understand the vibration that they will expect and provide maximum vibration limits for this area. This alignment is different than any other alignment since the cut and cover alignment is going to be with 50 feet of residential homes. The EIR needs to revised and recirculated so the community can understand the vibration impacts that could occur if this alignment is chosen.

25. On page 5-72
   a. If the Pacific avenue alignment is chosen liquefaction is an issue for the pipeline. The pipe will sit imediate adjacent to a slope that can liquefy and undermine the pipe and cause it to break and spill waste into the wildlife reserve. No other alignment has such issues. A portion of the pacific avenue alignment has city owned property that will not be developed and as such the property will erode with time making erosion and liquefaction a major issue for the pacific avenue alignment.
      i. If the City proposed to reinforce this section this will drive up costs and increase construction time. This makes the Marquessa alignment a better alternative.

26. I have attached a past report that discusses several items regarding the pacific avenue alignment. These issues do not appear to have been covered in the EIR. Please address.
   a. Page 5 of report on regarding seismic
   b. Page 5 of report on Liquefaction
   c. Page 6 of report on Groundwater and settlement
   d. Page 6 of report on Vibration and noise
   e. Page 7 of report on Receiving pit
   f. Page 8 of the report on the corner of Pacific and Via Marina
   g. Page 8 and 9 of the report on the construction along Pacific
REPORT ON THE PROPOSED SEWER PIPELINE
IN THE VENICE PENINSULA

By
Mark Van Gessel, P.E. – Civil & Ocean Engineer

October 15, 2002
Report on Proposed Sewer Pipeline in the Venice Peninsula

By

Mark Van Gessel, P.E. - Civil & Ocean Engineer

EXECUTIVE SUMMARY

This report has been generated to discuss the different alignment options for a proposed 54 inch future sewer line. Presently only two alignments have been proposed: A Pacific Avenue alignment and a beach alignment adjacent to the existing sewer line.

After a detailed review of the available information (Moffatt & Nichol report and Dames & Moore Geotechnical report) this report provides conclusive evidence that a beach alignment is a preferable alignment.

A beach alignment is the preferred alignment when you compare the alignment options for the following issues: environmental protection, safety, effects to neighbors, cost, and time.

The City should consider revising their preferred alignment option to a beach alignment, which is environmentally better, cost effective and easier to construct and maintain.

AUTHOR'S BACKGROUND

Mark Van Gessel holds a Bachelor of Science in Ocean Engineering and is also a Licensed Civil Professional Engineer. He has worked in the field of pipeline/tunnel design and construction for over 10 years. He has worked on numerous projects with varying sizes of pipes from 4 inches to as large as 144 inch pipelines and numerous site tunnels and pipe-jacking projects up to 16 feet in diameter. This technical background and actual work experience allows him to provide an expert opinion on the proposed project.

COMMENTS ON THE MOFFATT & NICHOL REPORT

Below are general comments and concerns regarding the Moffatt & Nichol report prepared by Russell H Boudreau. A review of this report shows that it contains fundamental errors as well as incorrect and incomplete information. I have cataloged the comments into groups: project location, permits, beach erosion, and sea level predictions. It is the author's opinion that the Moffatt & Nichol report contains so much incorrect and missing information that it needs to be completely rewritten and cannot be used to make any decision to eliminate a beach pipeline alignment option.

Project Location:

This report specifies the location as adjacent to the existing 48" sewer. The actual location of a future pipeline has not been finalized and a specific location should not be analyzed but a general alignment with possible locations should be discussed. While the alignment adjacent to the 48" line, may have been dictated by others the author has the professional obligation to discuss the ability to shift the alignment if such a shift mitigates concern.
The ability to locate the proposed pipeline is not limited to the stated alignment and can be located anywhere within the sand zone. By shifting the alignment East just 25 feet would reduce the erosion concerns (which is an incorrect concern). By shifting the pipeline location 100 feet (20 feet East of the existing pipeline numerous issues outlined in the paper would be avoided. This shifting of the alignment would have far less impact to the beach and will provide better construction access making the project cheaper and quicker to build plus provide easier access for future service.

Permits:

Several very critical permits were not listed in the M&N report. It should be noted that this report makes it appear that only the beach alignment will require the permits discussed in the report. This is incorrect. All the permits that are listed in the report are required for any alignment.

There are several additional permits that are required for the Pacific Avenue Alignment that are not mentioned and are critical in evaluating the different alignments. Below are several permits that were missed and required for this project.

<table>
<thead>
<tr>
<th>Permit</th>
<th>Agency</th>
<th>Issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>CEQA</td>
<td>City of LA</td>
<td>This project requires a full Environmental Impact Report (EIR) report to be prepared in order to proceed. It must be filed and also allow for public input and review. Any present meetings or discussion do not substitute for public review once the report has been prepared. Additionally, all public comments must be addressed.</td>
</tr>
<tr>
<td>NEPA</td>
<td>Federal Government</td>
<td>This project shall require a federal clearance. Similar to the above report and can potentially be combined. But never the less a NEPA Clearance is required.</td>
</tr>
</tbody>
</table>
| Police Noise Variance   | City of LA                  | For the Pacific Avenue alignment the project will exceed the allowable noise levels and potentially the hours of construction and shall require a variance.  
  * This permit is only required for the pacific avenue alignment. |
| Street Easement Permit  | City of LA                  | A permit to work in the street is required. Additionally, the City of Los Angeles has also added a special clause to require the City to be reimbursed for cutting and patching streets based upon damage done to the street. Based upon past experience the amount of pavement being removed in the Pacific Avenue alignment it is more economical to remove and replace the entire street, including sidewalks, then to pay the fee associated with the cutting and patching. It has been stated, by the City, that other City agencies are not exempted from this requirement.  
  * This permit is most likely only required for the pacific avenue alignment. |
Beach Erosion:

While the report discussed, in very generic terms, the concept of beach erosion it generalizes and claims that all beaches are sooner or later going to be eroded. This is incorrect.

The Army Corp of Engineers (Corps) has performed a detailed report of this specific area and the associated beach as part of the Marina del Rey Dredging project. This report discusses the problem that is occurring along this stretch of beach, which is increased sediment, not beach erosion. If the author of the Moffett & Nichol report had reviewed the Corps report they would have been able to properly indicate that the beach for this proposed sewer project is actually growing and will continue to do so.

Where the report discusses other areas of Venice Beach that are eroding the report neglected to state the specific reasons why the erosion was occurring. All of the features that are causing the erosion elsewhere do not exist in the specific Marina del Rey site.

If the M&N author had used the bible in beach design, “The Shore Protection Manual” the beach area where this proposed project is located would be shown to be a stable or expanding beach rather than a contracting beach.

The report needs to be updated to properly reflect the state of this beach.

Sea Level Rising:

In the Moffatt & Nichol report several documents regarding sea level estimates were quoted. These documents are not current industry standard or what is presently being used in the professional environment to estimate future sea level elevations. The numbers provided are based upon unrealistic variables.

Just recently, 2001, there was a conference on ocean issues where sea level predictions were presented. At that conference the numerous estimates were combined and the chart showing that information is presented below. As one can see the experts in the field all agree that the sea level elevation is increasing but no where near the erroneous levels stated in the Moffett & Nichol report.

Estimates for sea-level rise from the IPCC Climate Change 2001
The Moffatt & Nichol report needs to be revised to accurately reflect what is being used in the professional industry for future sea level elevation increases.

A review of the worst-case scenario shown in the chart is a sea level elevation increase of less than 0.9 meters (less than 3 feet). If the report used such proper information the stated beach alignment would be feasible.

If the report is correct, which in my professional opinion it is not, the proposed project could be moved just 23 feet East and avoid the erosion problem. It would also require the Sanitation District to perform some kind of relocation or protection project for the existing 48 inch line. The report also neglects to take into account the depth of the pipeline and the protection (concrete encased) being proposed for the pipeline, both of which would allow a beach pipeline alignment. Additionally the report fails to discuss the positive attributes of allowing for the rehabilitation of the existing sewer line.

The Moffatt & Nichol report needs to be revised to accurately reflect that the rise in the sea level elevation is not a concern for the proposed beach alignment.

**COMMENTS ON THE DAMES & MOORE GEOTECHNICAL REPORT**

The Dames & Moore geotechnical report provides even further evidence that a Pacific Avenue alignment is not a practical, cost effective, or realistic alignment. Within the report numerous items are discussed that are major concerns only to a Pacific Avenue alignment that are not a concern with a beach alignment.

Due to the seismic concerns, liquefaction, dewatering, settlement and vibration issues a Pacific Avenue alignment should be abandoned. The correct alignment based upon the Dames & Moore report should be a beach alignment.

**Seismic Issues:**

The Dames & Moore report clearly states, in Section 8.1, that seismic activities are a concern to the structural integrity of the pipeline. In the event of a seismic event large enough to damage the pipeline so many negative effects to the environment and the community would occur with a Pacific Avenue that it should be not be considered. An actual pipe rupture would release raw sewage into the local community and also the Ballona Lagoon killing the wildlife and permanently contaminating the lagoon.

Depending upon where a rupture occurs along the Pacific Avenue alignment the ability to repair the pipeline would take longer to repair. This again is critical because while the pipeline is under repair raw sewage could be released from the pumping station. This means that a future pipeline needs to be easily accessible to repair in case of a rupture so as not to cause damage to the wildlife of the lagoon.

When considering seismic concerns a beach alignment is the preferable alignment.

**Liquefaction:**

The Dames & Moore report states in Section 8.2 that liquefaction is a major concern when designing and selecting the alignment for this pipeline. This report does not compare the two alignments but a review shows that a Pacific Avenue alignment has far more engineering problems in the event of a liquefaction event. Since the Pacific Avenue alignment is adjacent to the canal and lagoon a liquefaction event along has the potential to collapse a portion of the street and cause the pipeline to become exposed and rupture. The East side of the Pacific Avenue alignment has an exposed slope.
that would fail and provides no support in a liquefaction event. This potential does not exist for a
beach alignment.

Recommended mitigation measures discussed in the report include compaction grouting. What is
not discussed with compaction grouting is the environmental impact of grouting. Grout will migrate
through the soil and will contaminate the groundwater and also flow into the lagoon, contaminating
the environment. Specialized grouts such as chlorosilane or polymer-based grout may be required to control
liquefaction. Such specialized grouts have an even greater impact on the environment and need to
be analyzed. Grouting should not be required for a beach alignment.

When considering liquefaction concerns a beach alignment is the preferable alignment.

Groundwater and Settlement

The Dames and Moore report, Section 9, clearly states that a Pacific Avenue alignment has numerous
problems when compared to a beach alignment.

Dewatering is required to be performed and the water is required to be treatment and disposal of.
This is a major issue and has not been addressed. Proper treatment of groundwater and the
installation of wells is not covered or discussed in any documents provided. The equipment necessary
requires a large space and easy access, none of which is not available in a Pacific Avenue alignment but
is available for a beach alignment.

The other major issue with dewatering is settlement. Section 9 states that settlement is usually
associated with dewatering activities. In the soils located within this area major settlement should be
expected. When the water is removed from the soils the material will consolidate and settle. It should
be anticipated that effects from settlement would extend beyond the street to the adjacent properties
on both sides of the street. This settlement issue is a major concern especially with properties adjacent
to the Lagoon in that such settlement could cause the slopes to become unstable and collapse. A
major slope failure could impact the street, the existing water line and the proposed sewer line, in
addition to structures.

Settlement will occur with a Pacific Avenue alignment and the City needs to properly plan for
settlement.

Groundwater and settlement is not an issue with a beach alignment.

When considering groundwater and settlement a beach alignment is the preferable alignment.

Vibration and noise due to construction activities:

In Section 9 of the Dames & Moore report it clearly states that the Pacific Avenue alignment
construction will create noise and vibration that will impact the neighbors. What the report fails to
discuss is the noise impact to the environment.

Due to the proximity of construction site to the lagoon the construction impacts of a Pacific Avenue
alignment will require environmental mitigation. Such restrictions are most likely going to be far more
costly than the environmental mitigation measures and restrictions associated with a beach
alignment.
The vibration will also impact the adjacent properties. Construction activities so close to properties have similar concerns as for settlement and seismic issues. Due to vibration the Pacific Avenue alignment has a high potential for slope failure, damage to adjacent building, and streets.

Such concerns do not exist for a beach alignment.

When considering vibration and noise the beach alignment is the preferable alignment.

**COMMENTS ON THE PACIFIC AVENUE ALIGNMENT AND COMPARISON WITH BEACH ALIGNMENT**

Based upon the information that has been provided to me I have enough information to provide my expert opinion that the Pacific Avenue alignment as presently proposed is not a constructible project and is substantially more expensive and time consuming than a beach alignment and impacts the environment far more than a beach alignment.

**Receiving Pit:**

The Pacific Avenue alignment presently shows a receiving pit for the tunneling operation under the main channel. From the information provided, it is obvious that the person who proposed the pit has never constructed or worked on a tunneling project.

**Pacific Avenue Pit:**
- A receiving pit is rectangular, not a circular.
- The size of the pit is too small to allow for a tunnel machine to be retrieved. The pit must be twice that size. Based upon experience with similar projects a minimum of a 100-foot pit would be needed.
- The location of the Pit is to close to the breakwater. An analysis of the underlying material needs to be performed. From drawings of the breakwall design, that I have seen, there is a high likelihood that boulders will be present in this location. A pit can be located in such an area and needs to be moved farther back to ensure that the breakwall is safe.
- Having two turns in the pipe at the pit is not constructible, practical or advisable. The pit would need to extend even further back beyond the elbows, as a minimum, to allow for construction of the pipeline.
- A proper pit would require the entire corner area to be shut to through traffic.
- The drawings forgets to show where all the dewatering facilities will be located. They need to be located adjacent to the pit and require additional space that is not available.
- This location cannot be enlarged to allow for it to be a tunneling pit. There is just not enough room for a tunneling pit at this site. Tunneling from this side is not possible. This limits the construction options. This will lead to an oversized machine costing more money to construct.
- An analysis of the ability for Ductile Iron Pipe of this size to make all of the turns as shown and at the pressures proposed needs to be provided so that the community and the environment is protected from a breakage and leaking pipe.
- No details on the concrete encased for this portion critical item.
Beach Pit:

- A receiving pit for a beach alignment can be located in the proper location to ensure that it will avoid the boulders that make up the breakwall and also be located far enough back to provide proper safety to the breakwall.
- The open space allows for proper area to provide the necessary dewatering and water treatment facilities that are required for such a pit.
- The pit would only have a single angle pipe and not the double curve making the pit smaller and the construction easier.
- By having a pit on the beach the Contractor will not be forced to tunnel from only one direction and could have the option to tunnel from either side.

It should be noted that the location of the pit, either at Pacific or on the beach does not effect where the tunnel ends at the other side. The alignment can stay where the City believes is best on the South side of the Marina channel. Thus any costs south of the channel are equal.

Construction at the corner of Pacific and Via Marina:

Pacific Avenue Alignment

- You have not provided a detailed discussion of the construction sequencing at this corner.
- Based upon the alignment that you propose the construction at this corner will require the entire street to be closed in order to complete. This construction cannot be accomplished without shutting down the intersection for some time. This is in contradiction with your statements on the project.
- It will be impossible to allow buses to travel past the construction site. This is in contradiction with your statements on this project.

Beach Alignment

- Not possible

Construction Along Pacific Alignment:

There are so many problems and difficulties that have not been addressed that make this alignment impractical compared to the beach alignment that it is impossible to justify a pacific avenue alignment over a beach alignment. Below are items that exist in the pacific alignment that are not present for the beach alignment.

- The Pacific Avenue site is requiring a concrete encasement as I would guess would be a beach alignment. The big difference is that due to narrow trench for the Pacific Avenue alignment a great mix would be required to ensure the material could get underneath the pipe. This would not be required at a beach alignment because the trench width is not restricted. Grout is 3 times more expensive than concrete. This cost is not reflected in the present design or cost analysis.
- Traffic issues are numerous compared to the beach alignment. There are so many that it would take several pages to list them all.
  o The biggest is that the base upon the drawings that you provided there is not enough room for buses to travel down the street.
  o You have not shown the dewatering equipment at the water treatment facility.
  o You have not provided enough trench width to place concrete around pipe not build a proper and safe trench.
  o You have not addressed existing utilities and how they are handled.
  o You have not provided enough space for a crane that is capable of lifting and placing the pipe.
- You have not provided enough width for the trucks that deliver the pipe pieces.
- You have not discovered the fact that the area slated as temporary parking is sand and sloped and unsuitable for parking and needs to be improved and such improvement will have effects on the Ballona Lagoon.
- The Section view is incorrect in that the pipe at Pacific and Via Marina is substantially deeper. This is especially important when you consider the impacts of a pit and the depth of a trench at the above corner.
- A profile of the pipeline is needed.
- The section does not show the concrete encased discussed in the drawings.
- The drawings do not show how the K rail impacts the traffic and makes the travel lane to narrow.
- You neglect to provide details of construction sequences between Top sail and Via Marina and how access to the East side property owners will be provided.
- You neglect to state how you are going to enforce residential parking only requirements a restriction that will not be possible to enforce.
- You neglected to discuss the impact to the birds and other wildlife in the Ballona Lagoon and potential construction restrictions due to migrating birds causing extended construction duration.
- Discussion of potentially contaminated soil under Pacific Avenue compared to the beach alignment. This area was a major oil construction site in its past and most likely contains contaminated soils whereas the beach alignment does not have such a problem.

- Existing material at both sites is exactly the same thus any solid stabilization requirements for the beach option would also be required to the Pacific avenue location. Any claim piles are required to the beach site but not required for the Pacific site are incorrect.

All of these are issues exist for a Pacific Avenue alignment and do not exist for a beach alignment. The beach alignment can be done with a cut and cover V trench construction method that is substantially less money.

---

**BEACH ALIGNMENT ALONG THE VENICE PENINSULA**

While issues exist for different alignments a proposed beach alignment has far fewer issues than any other alignment. Any concerns with an alignment along the Venice peninsula beach are all mitigatable whereas that is not the case for a Pacific Avenue alignment. Based upon my expert opinion this alignment is also economically far less costly than compared to the pacific avenue alignment. A Pacific Avenue alignment would be at least twice as expensive as a beach alignment to construct.

This makes a beach alignment thorough in the Venice peninsula the preferred alignment.
Constructability:

There are several construction methods that could be used depending upon the temporary and permanent easements that could be obtained. They could include a non-shored trench, partially shored trench or completely shored trench. Even with the most expensive method of completely shored trench, it would be more economical that building a trench within the street right-of-way. Construction along the beach is better because there are no existing utilities to work with, no minimums open trench restrictions, easier construction if shoring is required.

Easement:

While an easement must be obtained, from my personal experience in obtaining easements for similar projects, an easement is obtainable and could easily be obtained to support any construction schedule. The easement that would be required could be started during the permitting process and be available immediately after the permitting process has been completed and thus would not impact any construction schedule.

From past experience the costs for such an easement are not nearly as expense as the City is stating. As a matter of fact, City and County agencies usually work together and only charge actual time incurred if they charge any costs.

Concerns about Least Tern Refuge:

While there is a concern about least tern, such a concern is easily mitigatable by putting construction restrictions on the contractor so that the contractor only constructs within a specified distance of the least tern refuge during non-breeding season. Since the construction is far easier and quicker that in the pastic alignment this would not cause any real cost impact to the construction. Any reasonable contractor would not put any additional money for such a restriction but would just make sure to schedule the work correctly so construction would not occur in that area during that time. In today’s modern construction industry this is a normal construction restriction. It would also be advisable to design the alignment outside of the actual fenced off area of the least tern refuge thus not disturbing the habitat.

Requiring an entire beach alignment if the Venice peninsula alignment is used:

This requirement is not a proper design nor should such a requirement be imposed. Any discussion of fixing an alignment or having a Venice peninsula beach alignment issue more costs for a southern portion are not correct need to be deleted.
Please use this page to submit your comments regarding the Draft Environmental Impact Report (EIR) for the Venice Pumping Plant Dual Force Main Project. You may comment on any aspect of the report. Your input will become part of the public record and will be considered in the Final EIR, if received by 5:00 p.m. on March 17, 2008 (the end of the public comment period).

When making your comments, please be as specific as possible:

- Where will the equipment be stored if the project begins at Hurricane & Pacific?
- Where will the trash receptacles & porta-potties be located?
- Will access to Pacific Ave & N/S of Hurricane be open - if only one way access?

(If necessary, please use the reverse side of the paper.)

Please complete the information below and print clearly to ensure that your comments are addressed in the Final EIR.

Name: Madeline DiNovo Phone: 310-305-1958

Organization (if any):

Address:

City: State: Zip:

You may drop your comments in the comment box at the Comments station or mail them to the following address. All comments must be received no later than 5:00 p.m. on March 17, 2008.

James E. Doy
City of Los Angeles
Department of Public Works Bureau of Engineering
C/O Public Affairs Office
200 N. Spring Street, Room M166
Los Angeles, CA 90012
environment@cpw.lacity.org

Subject heading should read "Venice Dual Force Main".

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and upon request, will provide reasonable accommodation to ensure equal access to its programs, services, and activities.

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Venice Pumping Plant Dual Force Main Project

COMMENTS

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When making your comments, please be as specific as possible:

Notify residents on a monthly basis of the construction schedule and street and alley closures

Please complete the information below and print clearly to ensure that your comments are addressed in the Final EIR.

Name: susan papadakis Phone:
Organization (if any): GRAYN
Address: District 2
City: LA (Venice) State: Zip: 90291

You may drop your comments in the comment box at the Comments station or mail them to the following address. All comments must be received no later than 5:00 p.m. on March 17, 2006.

James E. Dyk
City of Los Angeles
Department of Public Works Bureau of Engineering
Civil Public Affairs Office
200 N. Spring Street, Room M165
Los Angeles, CA 90012
environment@eng.lacity.org

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Venice Pumping Plant Dual Force Main Project

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When making your comments, please be as specific as possible:

BEACH ROUTE!

ORIGIN

Please complete the information below and print clearly to ensure that your comments are addressed in the Final EIR.

Name: PHIL MAIDEN Phone: 310-749-9449
Organization (if any): GRUN
Address:
City: State: Zip:

You may drop your comments in the comment box at the Comments station or mail them to the following address. All comments must be received no later than 5:00 p.m. on March 17, 2006.

James E. Doly
City of Los Angeles
Department of Public Works Bureau of Engineering
C/o Public Affairs Office
200 N. Spring Street, Room M166
Los Angeles, CA 90012
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11.3. ANNOTATED TRANSCRIPT OF FEBRUARY 23, 2006 PUBLIC HEARING CONDUCTED BY THE CITY OF LOS ANGELES ON THE ADEQUACY OF THE EIR
MS. DURRELL: Good evening. My name is Tonya Durrell. I'm with the Department of Public Works, Public Affairs. I am your official public hearing officer for the evening. I want to point out that you are here attending a public hearing for the Venice Dual Force Main Sewer Environmental Impact Report.

And please excuse my notes, but I want to be sure to cover everything this evening. I hope that everyone has had an opportunity to sign in tonight, and if you haven't, please be sure to do so at the table in the back.

Also, we have an agenda at the table. We will be making project team member introductions in just a few minutes. We also have speaker cards available if you wish to be heard tonight. And if you need one throughout the presentation, please just raise your hand and one of our representatives will be sure to get one to you.

You obviously can be heard tonight so that all of your comments are part of an official record that will be a part of the final EIR. And everything that is being said tonight will be recorded by our court reporter who is here with us.
tonight.

I'd like to start, then, with our team introductions. We'll start with Mr. Doty.

MR. DOTY: Welcome. I'm glad you took time out of you regularly scheduled events to come help us out on this project. It's very good to see you here.

The project we're talking about tonight is a project that's needed because we need additional capacity for the Venice Pumping Plant.

MS. DURRELL: We're going to do other instructions, and then we'll come back to you, Jim.

MR. DOTY: I'm Jim Doty. I am the manager for the Environmental Impact Report that we're discussing tonight.

MR. DELKHASTE: And I'm Jon Delkhaste, and I'm the project engineer.

(Additional member introductions.)

MS. DURRELL: As I said before, all of the comments will be recorded tonight by a court reporter and will be part of the final EIR. As with any project of this magnitude, the Venice Force Main Project must follow the California Environmental Quality Act Guidelines, and as part
of that process, we obviously want to hear back
from you, the community.

We want to share our expertise, disclose
analysis, and we want to discover the public
concerns and also solicit counter proposals. So,
obviously, we welcome all of your comments. Just
so you know, it is helpful when your comments
suggest additional specific alternatives or
mitigation measures. Be sure that your comments
include your name, your organization, if you're
representing an organization, and any other
information including a phone number.

This public hearing is your opportunity
to be heard. We are going to be listening tonight
to your concerns. We will not be responding to any
questions, but please be assured that all of your
concerns will be on record, and we will be
responding in writing to your questions and
concerns.

And with that, I'd like to now introduce
Jim Doty to begin tonight's presentation.

MR. DOTY: Okay. The reason that we
called you out and the reason that we're doing this
is that we need to provide additional capacity for
the Venice Pumping Plant, and the project engineer
will go into that in greater detail.

The plant is fine. It has plenty of capacity, but the line that leads from the plant down southward towards the Hyperion Treatment Plant does not have sufficient capacity. And also, we would like to provide redundancy for that line, because right now all of the sewage coming out of that plant goes through one single line. We cannot take it out of service to inspect it. And if something untoward should happen, we have no alternative way to handle the sewage.

The goals of CEQA are to make sure that when your decision makers make a decision whether to construct a project or how to construct a project, that they are informed of what the environmental consequences of that decision will be.

They also need to know what mitigation measures are available to reduce the effects of a project or what alternatives would have lesser effects than the originally proposed project. And all of that is so that we can maintain a quality environment for the people of California.

The reason we’re coming to you is because we want to disclose to you what our analysis is,
what we have found. We're hoping that if you have
expertise, you will share that with us so that that
can improve the quality of the work going into this
project. We want you to check our work, make sure
that it's accurate, make sure that it's complete.
If there's something missing, let us know about it.
If you have a counter proposal, most
importantly, we need to know what your concerns
are. There is no way we can tell what your
concerns are other than to come to you and ask you.
You know your neighborhoods best, and we need to
know what you know. So that's why we've asked you
to come tonight.

What we've looked at so far and in a very
large masterful work are three potential alignments
connecting the dots between the Venice Treatment
Plant and the southern connection point, where we
need to go, and three different construction
techniques. So the EIR is rather large because we
have this matrix of possibilities that we have
looked at.

With that, John.

MR. DELMASTE: Thank you. Basically,
what you see here is a map showing all the major
sewers in the city. Here, what you see is a map of
all the major sewers in the City of Los Angeles,
and here's the valley and here we are.

   Now, all these sewers around the coast --
these are the sewers -- go here to Hyperion -- I
mean, to the Venice Pumping Plant at this point.
Because up to this point, it is a gravity flow. It
goes down to that point.

   Now, to get it from here, from Venice to
Hyperion Treatment Plant before being discharged
into the ocean, we have a slope going up, and
that's why we need the Venice Pumping Plant, which
is the largest pumping plant in the City of
Los Angeles.

   This is something you guys are all
familiar with -- Venice Pumping Plant. And as you
can see, one of the alternatives -- we are going to
be going over the alternatives later on, but this
is the area of one of the shafts. If you choose
one of the routes, that's where it's going to go.
And this is Hurricane Street as you all are
familiar.

   To give you a very brief -- those people
who haven't been here -- briefly, in 1928 Venice
Force Main was built, and at that time it was a
36-inch line. Population increased, and the demand
went up. Then in 1958, the Venice Force Main
was -- it went up to 48-inch line, and we added one
more pump to it. It was four pumps at the time.
And in 1987, again, due to population
increase and the need for more capacity, we have
another pump, which is the fifth pump we added.
However, at that time they didn't think there was a
need for extra capacity in terms of the pipe, so
they kept it as a 48-inch line.

Now, what happened is in 1995, due to
El Nino, we have heavy rain. And last year, again,
due to heavy rain, what we discovered was that the
amount of sewer that we were carrying, at the same
time the rain was infiltrating into our sewers,
which happens a lot of times during rain.

But this time, since it was heavy rain,
it increased it to the point that they had all the
five pumps working to push the sewer up the hill to
Hyperion, and what happened is they found out it
was like a bottleneck. The 48-inch line was not
capable to carry all that sewer, so it was carrying
maybe about 60 percent of it.
The rest of it started backing up into
our manholes, and we were really close to disaster.
We were really minutes away from the sewer
overflowing and going to the Grand Canal and onto
the streets. So we were lucky then, and we were
lucky last year. That's the reason we really need
what we are proposing, a 5t-inch sewer.

Now, this is going to give us -- the good
thing about having the sewer is going to give us
the capacity to be able -- during the wet season
that we had, as I mentioned, we are going to have
the capacity to have the sewer going to Hyperion
without fearing about the overflow.

And the other thing that we have to
remember is in 1958 -- that's when this was
built -- the sewers were -- the capacity wasn't
really -- it was great for the time, but it's been
1958 until now. It's, like, 48 years old, and
these are old. The pipe is old, and I don't know
how long it's going to last.

So we need to perform some maintenance
work maybe, but we need to do inspection first. In
order to find out if it really needs rehab or
not -- and we cannot perform any inspection as long
as the line is in operation.

So now, what we came up with so far,
before we get any comments from you -- so far what
we have is three alignments, and I'm sure all of
you are with EIR, so you are very familiar with this. Here is Venice Pumping Plant. So from Hurricane Street, one is going to go on Via Marina and then going down here. From here we are going to have -- and then it goes under the channel, Pacific, and it's going to continue on Vista Del Mar.

Then we have alternate alignment going west on Hurricane Street, going south on Pacific, under the channel, and continuing to go to Vista Del Mar. And all of them end up the same place, which is the CIS. That's where they're all going to go.

And the third alternative that we have is going to go to the beach. From there, down the Dockweiler, under the channel, and continue. And eventually it's going to end up in the same place.

These are the three alignments that we have. To do this, we have three construction methodologies set which we are considering. And one of them is open cut.

As you can see, it's an open trench, and that's the easiest way for contractors to do the job. Normally, it is the least expensive way to do it. That's what it's going to kind of look like in
your neighborhood. And this is the construction
you're going to see from outside.
And here you can see the advantage and
disadvantage of this. Primarily, the shortest
construction time, and the cost is going to be the
cheapest -- the least expensive, I should say. And
another thing is, this open cut, it always moves.
It is in front of someone's home for a few days.
It can vary every week.

It can move about 200, 250 feet or more
depending on the conditions we are going to have,
which means they are going to be laying the pipes.
As they lay the pipe, they are going to come back,
fill it, and then they are going to put asphalt
right after that. So it's not going to be in front
of your house for more than only a few days. Now,
the thing is, your neighbor is going to have it,
but it's going to move on. So that's the good
thing about it.

Now, the problem with this is, I know
that if I'm living there, I don't want work in
front of my house. I don't care for it too much,
but most of the impact is going to be on the
surface street in terms of traffic and all the
other environmental issues that I don't need to go
over.

Now, this one is a small tunnel method.

This one is going to have much less interruption on the surface street. Primarily what it does is we have pits here, and then we are going to have jacking and the pipes -- as you can see we have a machine that is digging under the surface street. And then as it is going, we have jacking that is going to be pushing the pipes in.

And as you can see, we are not going to be cutting the street here; however, if your house is here, this pit is going to be in front of your house for maybe a couple of months. But if your house is in between, that can be about 1,000 feet, so you are not going to have problems. So that's the good thing about this method.

The depths of it is going to vary; for example, in this case we are going to go -- on the street surface is going to be lower. When we get under the channel, we are going to be at least 25 feet below the channel. So what happens is this method -- the drawback of that is, we cannot keep going. We have to have 1,000 feet, and then you need another pit, so we are not going to be totally disrupting the traffic flow.
Now, the good thing about it, as I said, we are going to be avoiding a lot of surface impact. It's great for the intersection, and the minuses is duration of impact is longer at the pit locations.

Now, the last construction methodology that we are using is deep tunnel. And for deep tunnel, we have different alternatives; for example, this is under Pacific -- can go this route. Or from here, Venice Pumping Plant, we go down by the beach and from here going all the way down here.

Now, to explain to you a little bit about deep tunnel, basically, what deep tunnel is, is we're going to have a starting shaft at this point or maybe it is going to be farther here. We don't want to be close to the neighborhood because we are going to be there for a long time, actually, almost during the whole entire operation. We don't want to be close to the neighborhood, so right now it is here, but it is possible to push it a little farther back.

Now, this pit here, the shaft is going to take a few months to build. After they build it, the beauty of this is, then they can go all the way
to this point, and from here, they can either go
large tunneling or small tunneling or they can have
open cuts and get to Venice Pumping Plant or they
can just go all the way to this point without
having any interruption on the surface street.

This is how it's going to look under the
ground. We are talking about activity 80 feet
under the ground, so you won't really feel
anything. But that's what the machine looks like.
And this is showing the location from outside.
This is how the operation is going to look from
outside.

The good thing is, this is the
construction site during the whole project. Now,
as I said, fewer construction sites. And then the
minuses of this are impacts at the insertion shaft
for entire duration of the construction,
rights-of-way, and the cost. Of course, the cost
is one of the factors, and duration of the
construction is the longest than the rest of the
projects.

Those are the alternative methods;
however, when we have the alternatives, I have to
add that you see three alignments, but we can have
different kinds of alternatives; for example,
tunneling can be combined with open cut or other
methods. So altogether, we can have seven or eight
kinds of alternatives.

Thank you very much. Jim?

MR. DOTY: Thank you. So here we are
back to that table we introduced at the beginning.
And just in gross math permutations, there would be
nine alternatives, but the EIR really concentrates
on six because the cut and cover construction
method down the beach alignment, we believe may be
infeasible for environmental reasons.

It's not something that we feel
comfortable coming out strongly for, but we have --
in during the public comment period, we have
received some public comment in favor of that
alignment.

The small tunnel method down Pacific
Avenue, because of the size of footprint needed for
the shaft site for driving those tunnels, we
believe may be infeasible for environmental
reasons. And we did not look into detail in a
large tunnel going under the Via Marina alignment
because it offered no advantages over the other
possible alignments for the large tunnel, so there
was no reason to go into that.
This is what the EIR finds in one page.

First of all, no operational long-term impact.

That's kind of a no-brainer. Once we finish the tunnel and restore the surface to its preexisting condition, we're out of there. There are construction impacts, and we've gone over them a couple of times already.

Normally, in a typical project, you usually find construction impacts -- short-term impacts as insignificant because they're short term in duration. Because of the magnitude of this project, short term is no longer a couple of weeks or something. It, although temporary, will be there for a while.

And because of the sensitivities of the project area, we are calling those temporary construction impacts significant. This project is not going to affect your land use or planning.

We're not going to turn an environmentally sensitive area into a Wal-Mart or something.

A whole bunch of mitigated impacts that can be mitigated to an acceptable level. Air quality: Here we're talking mostly about the air emissions from construction vehicles and dust caused by handling the soils and so on.
Cultural resources and paleontological resources: We have done surveys of the area.

There are no known resources in the areas that we're looking at, but you just never know because they're underground.

Geology and soils: As you know, there's sand out there. There's oil wells. We know about these things, and we can take care of it. We're pretty experienced at that.

Since I've mentioned oil wells, we'll get to hazards and hazardous materials. We know the area is likely to be gassy, and we know there are lots of abandoned oil wells. We know that there are a few that are not on the map. We have tunneled through such area before successfully -- knock, knock. We can mitigate that to an acceptable level.

Biological resources: We know we're in a sensitive area, and the EIR identifies measures to avoid a biological impact, such as having knowledgeable monitors checking to make sure that sensitive species do not have an adverse response to what we're doing.

And hydrology and water quality: There are a whole lot of standard measures that we do in
public works projects to address and avoid pollution of surface waters. Even with that, there are a few subject areas where we cannot avoid a significant impact, and those are aesthetics. Even though there are people that really enjoy big machines doing big boy stuff and just love to come down to our construction sites and watch things happen, most people who are used to looking out to the beach would probably think that our construction sites are not a positive. So we're calling that a significant impact. We will be out of there when we're down.

Noise is another. We will reduce noise, but, ultimately, we cannot eliminate noise. We put up a noise wall to reduce noise; however, then you run into the old aesthetics impact. People who liked looking at the beach and the sailboats going in and out of the marina channel are now looking at what looks like a three-story tall building. They can sleep at night, but they're not getting to see the boats. Either way, those two will run against each other and we'll have to do what we can to mitigate them, but we can't promise to make them go away.

Public services: Access to the beach,
public recreation events at the beaches and parks
and so on, there may be some access problems while
we're in the area. And that brings us right to
transportation and traffic.

Interestingly enough, most of the
alternatives we looked at will have a relatively
small impact on traffic and transportation -- much
less than what we anticipated when we developed the
scenario and then went to our experts and said,
"What do you think?" But, nonetheless, there will
be a significant impact on transportation and
traffic while we are constructing the project.

Back to our table. These flowers here
are just kind of a graphic way -- there is no way
in these environmental impacts that you can just
add up numbers and then come back and identify this
as your best alternative.

For instance, as we said before, if we
choose a tunneling method and you're in the middle
of the project and the tunnel is passing by you,
you know, 50 feet below ground, you love that
alternative. But if you're living next to the
tunnel driving shaft or the tunnel retrieving
shaft, you're not as happy with it. You just
can't -- it's not a mathematical thing.
So that's why we've just got spots here.

We've got flowers. The more flowers, the more environmentally superior, the more environmentally friendly that particular alternative is. And the EIR identifies a large tunnel roughly along the Pacific Avenue alignment as the environmentally superior alternative, although the beach alignment would be a close second.

I want to take this opportunity to point out that this is identified as the environmentally superior alternative. It is not the recommended alternative. At this point we do not have a recommended alternative. There is no project that we're hiding in our pocket that we're going to come out with after we go through our show here and tell the council people, "Yeah, we told the public."

No. Really, we don't have a preferred alternative. We will have to develop one, but we need to hear from you first because the information we're going to get from you is important to developing the alternative that we're going to recommend. We do eventually have to build something, so we do have to come up with a recommendation.

Okay. Money: This is a subject that I
have to admit I'm very uncomfortable with, because
in environmental analysis, we don't like to get
tied up with dollars. Tonight's meeting is about
protecting the environment. There will be other
meetings about protecting the bank account, but
tonight's meeting is about protecting the
environment.

But during the notice of preparation and
the scoping phase of this EIR, we got several
strong comments saying we want to know what the
relative cost of your alternatives are. That's why
we've got this in here, and you notice there are no
hard numbers. There are some concept level numbers
in the EIR, actual dollar amounts, but we stress
these are concept level.

They are not based on a design. They
will change. But their relative size should not
change. In other words, the one we're identifying
as cheapest in the EIR should not later turn out to
be the most expensive. So there you are. One
dollar sign means cheaper, and three dollar signs
means a lot more expensive.

And then here's the summary of the period
of time we would be out there. Notice that the
first two construction methods, cut and cover and
small tunnel -- small tunnel being either jacking
or microtunnel or a combination -- both of those
would involve small tunneling under the marina
channel.

We are not proposing an open cut method
across the marina channel. I have seen it done.
You don't actually hold back the water, but you dig
a trench in the bottom. But it's messy and not
really worth it.

Cut and cover: Overall project, 12
months. It goes very fast. Up to five days
passing any particular point along the route, like,
your house. It can vary, because it depends on the
precise conditions in that location. Cut and cover
would mean, then, that we would have a small tunnel
shaft on the one side of the marina entrance
channel and a receiving pit on the other side of
the channels.

Small tunnel would take longer, about 14
months with up to four months in a particular
location. Again, if you're lucky enough to be away
from that shaft, it's a good deal. If you're at
that shaft -- and of course, we would try to pick
shafts that are the most friendly -- but if you're
the nearest one to that shaft, four months and
you're really glad when we're out of there.

The large shaft takes a little longer --

36 months. A large portion of that is actually
setting up the construction as opposed to the
actual process of driving the big steel digging
worm through the soil. And we would be up to seven
months at the receiving shaft, which would be up in
the vicinity of the Venice Pumping Plant, so
neighbors close by. The payback we get with a
large tunnel is no surface presence in between the
points.

So what do we do next? We're going to
launch right into a period where we listen to your
thoughts and comments, but you don't have to say it
all tonight. Think about it. You can write to me
by March 17th.

I'm giving my address as c/o Public
Affairs Office. I'm not trying to dodge you. Our
offices, including the design office -- we're busy
in a move. We're moving out of our leased space
downtown to a newly purchased building. The City
bought one of those towers for the Department of
Public Works. Today I spent getting all my stuff
out of the boxes, but right now I don't have e-mail
or anything, and I wanted to make sure that your
comments got to the right place.

So send your comments c/o Public Affairs Office. If you'd like to e-mail, there's the e-mail address. And it would be helpful if you put in the subject line, Venice Dual Force Main, because we have a little sorting program that will look, and if it sees that, it will send it directly to me. It will get to me immediately.

Otherwise, every few days we go into that account and we manually look at that. But it will save a little time if you put that in there. It's not critical. You won't be sent to Mars or anything if you forget to do that.

So that's all. Thank you very much.

MS. DURRELL: Okay. Thank you, Jim. And as Jim stated, we are going to get started with our official public comment period. I did want to mention that we do, of course, have copies of the draft EIR at the table in the back. We also have a computer here, so if you'd like to submit your comments electronically, you can do that as well.

I just want to tell you about the ground rules. We're going to be working from speaker cards, and Julia will call out your name. You can come here to the microphone, and please speak
clearly. Please state your name and any
organization that you are representing.

Also, we have three minutes per speaker,
so please try to adhere to that. So we'll get
started with our public comment period and get the
first person up here.

MS. BROWN: Carol Kapp, please.

MS. KAPP: Hi. I want to compliment
Jim Doty and his team. I can tell from the EIR
that some of our comments from the May 24th scoping
meeting did show up in the EIR. That's probably
one of the first times in the city that our
thoughts actually made it to paper. So kudos to
you on that.

I do want to say that my name is
Carol Kapp. I live on Rees Street in Playa Del
Rey, which is adjacent to Vista Del Mar. And
because of that, I want to support the beach
alignment all the way.

I also want to talk about the fact that
the reason I'm in favor of the beach is because the
part of Vista Del Mar that we live in has a
palisade, and I certainly do not want to see a
repeat performance of slides, such as La Conchita
in Ventura or Blue Bird Canyon, which we all saw
how horrible that was. And I believe that the
vibrations from this project could trigger those
kind of lateral slides.

There are references in the EIR to moving
equipment and staff. I would like to tell you that
there is a street called Sandpiper, and it has been
closed since 2001 or a little thereafter because of
the terrorist attacks. I think that this could be
opened up. You can have your workers park there,
and you could buy a second-hand shuttle bus and run
them back and forth to wherever they're doing their
work.

Also, Los Angeles County beaches and
harbors have parking lots in the marina, and you
could probably get parking permits from your staff
there and, again, use some sort of a shuttle bus.
So I think that might help with some of those
concerns. Also, the county runs a parking lot on
Vista Del Mar south of Napoleon Street, and that's
another place to look for parking for your
staffing.

I don't know what the time is looking
like, so the last thing that I want to make a big
emphasis on is that there is a parking strip
adjacent to Vista Del Mar from Surf Alley north to
Montreal. And that is used for beach access
during the day and local residential
parking at night.

There has been no discussion of using it.
I just want to go on record and say there is no way
you can look at that for equipment lay down or
anything. So thank you very much.

MS. BROWN: Next we have Mark VanGessel.

MR. VANGESEL: I think the community
first really appreciates the fact that you actually
did an EIR rather than try to push through a
project previously in 2002.

Quick question that I think needs to be
addressed to the public tonight is right now, we are
going to have comments. And it appears to me that
it's not really complete and needs to be revised.

Do we get another chance to review this, or is the
City going to give us this one chance for us to
review, then make a decision, say that they had
public comment, and go forward? That way we do not
know what your preferred alternative is. So we
really need to understand that from the City	onight.

In looking at this, you claim that you
have six different alternatives; I've read it in
the summary. You really only discussed three. It
got pointed out a little later that there were six.
We'll all be realistic. You're saying that it's
$68 million to do a tunnel versus $45 million to do
cut and cover.

The City is under a budget crisis; we all
know that. The tunnel is not going to be a viable
option. Let's all realize that. So the City is
going to go with the cheaper method and do some
impacts.

Previously in 2002, the City had only two
alignments. One was a cut and cover along the
beach, and the second was going down Pacific Avenue
with cut and cover. In this EIR, for some reason
with no explanation at all, it just says the cut
and cover method along the beach is not viable.
That, to me, does not provide an explanation why in
2002, in 1957, and in 1938, cut and cover was the
way to go.

Now all of a sudden, it's no longer
allowed. To me, that makes no sense whatsoever.
Cut and cover along the beach is one of the
quickest ways possible.

I'd like to point out, I -- will run out
the time -- but the slices they showed you on the
trenching are incorrect to go down Pacific. They
have slides there showing trucks going down the
side. That is not going to be possible for Pacific
and most likely for the Vista Del Mar area either.

Discuss overflow: This is an important
item. People should realize that right now during
the last heavy rain of last year, Hyperion had to
dump water, overflow, which means that right now,
this Venice plant did not. All it's doing is
literally dumping more of it into the ocean.

So while they're increasing capacity
here, the Hyperion plant still couldn't handle it
anyway, and it would dump into the ocean anyway.
So the no-build alternative actually, to me, seems
like a potential viable solution until such time
that the location where you're going to send
everything can actually handle it. First, you
build a location, and then you do the upstreet
areas.

Next thing is, you say that there is no
environmental impact after the project is built.
For the Pacific Avenue alignment, cut and cover,
that is absolutely false.

People should realize who live in the
marina area, whether you live on the beach side or
the canal side, after this project is built, they will have big air-vac valves once every three streets to go underneath utilities. Those air-vac valves will release hazardous gases into the environment. I hope Jim Doty will explain that. I can actually show you the drawings that show it will occur.

So the EIR is incorrect. Hazardous gases, smelly gases -- who's been by Hyperion?

What does it smell like? We all know. What is this pipe pumping? That same material. The gases that get trapped in the pipe have to be released. They're going to blow right across the creek to all of the residents who live on the other side. And anybody who's living next it will actually smell it, too.

A few days in front of the houses when they trench -- absolutely incorrect. I used to be construction manager in the valley. Putting 12-inch line in front of somebody's house took over a week. The City has to do inspection after inspection after inspection. A 12-foot deep trench will require at least -- at least two weeks for the City to physically inspect it.

And if we want, I could go through it,
because the City has to inspect things. They have
to inspect the concrete that goes down. That takes
a day. They have to inspect the gravel road that
goes down. That is what their own document says.

I'm a manager for MTA Construction. I've
watched this. I know what the inspection does. It
says when you backfill, for every 6-inches, it has
to come up. So if this is in front of your house,
you will be impacted especially along Pacific. If
you go along Pacific and do a cut and cover, they
will have to de-water that trench. So if you live
adjacent to that, your house will settle.

I will say that I most likely ran out of
the three minutes, and I will let other people go.
but I have numerous comments, and I will submit
them in writing. And I just hope that the City
will give us a second round to look at this and
show us what the preferred alternative is.

MR. DELKHASTE: Just for the record, a
lot of comments that you made, I totally disagree
with you. I think a lot of them were inaccurate.
It was an incorrect representation.

MS. BROWN: Bob Krauch.

MR. KRAUCH: I do defer my three minutes
except for the underground large pipe or anything
that goes deeper. Is that more difficult and as
secure to get the material that's in there back up
to level? That's my concern.

Which of the three methods is the longest
range, safe way to do it? Is there any reference
to that?

MS. BROWN: Your comment is going to be
included in the final.

MR. KRAUCE: The infrastructure always
wears out. You're talking about 48 years. Is
there any method that is more long range that's
proposed here than any of the others?

MS. BROWN: The next person is Dan
Sharkey.

MR. SHARKEY: I'm Dan Sharkey. I live
within maybe 200 meters of all of these people.
I'd like to echo Carol Kapp's comment. Regardless
of what happens, it's easy to make promises and
it's sincere, but once you hire a contractor, we're
the victims.

Let's talk about parking. We don't have
it, and it doesn't help when the City drives a
truck that says "contract administration" around
every month. Whatever you decide, you need to
stick with it. We don't have parking. We're a
very tiny area. If you drop a pin on the beach, we
have a 250-foot bluff that acts like nothing more
than a large speaker and echo chamber.

We're a very unique geological
neighborhood. And whatever you do, we just asking
that you come up with the plan, stick with the
plan, and more importantly, force your contractors
to stick with the plan, and all those points about
which Carol spoke. But primarily, it's parking.

That's it.

MS. BROWN: Marcia Hanscom.

MS. HANSCOM: My name is Marcia Hanscom.

I live in Playa Del Rey near the Del Ray Lagoon,
and I'm also with the Wetlands Action Network and
the Sierra Club Restoration Committee.

I have a few comments related to -- I
haven't actually reviewed the draft EIR yet, but
based on some of the things that were said, I have
some concerns. One is related to whether or not we
need this and it is sufficient capacity -- you're
saying that Venice pumping station is already at
sufficient capacity, but the line may not be in the
future.

So the question I have is how does the
EIR analyze whether this is a growth inducing plan
and if so, how much new development is going to be handled by this. And one of the reasons I have this concern is I know, like, the Grassroots Venice Neighborhood Council has made development requests to the councilman.

There's a lot of concern of over development on this side of town, and right now there's sort of an assumption that more development will happen. And all of that, of course, will affect the traffic and quality of life and, of course, the natural resources.

And I would suggest that the city council needs to have a discussion and a conscious decision about that and a discussion about how much growth and development we do want in the future and how much we can really handle with public input, so it's not just saying that it's going to happen, but that we actually have a real conscious decision about how much and that stuff.

And if you don't do that, you're really eliminating your no-action alternative, which is required under the California Environmental Quality Act. Somebody said it is going to happen no matter what, but if you eliminate the no-action alternative, that's a violation of the law.
Secondly, liquefaction is a concern. I'm wondering how the construction on this is going to be impacted by that. Thirdly, it was talked about on the south end that you might move the site further into the El Segundo Dunes -- the construction site, and I would want to make sure that the El Segundo Blue Butterfly habitat is not being looked at. That is an endangered species, and it's something that you have to look at in terms of this.

I can tell you that the coastal commission has been very concerned about that, and they've required LAX to take out some palm trees that were not allowed there. So the kind of construction impacts you're talking about, they might be very concerned about that.

On the north end, I think it's important to note when you determine each of these alternatives that you're going to have a preferred one. And I do agree that the draft EIR does have to be recirculated to show which one of those is preferred before you go to the final EIR.

On the north end, not only is the California lease term of concern because it feeds right in that channel where you're talking about
having the longer term impacts, right by the Venice
pumping station, but also the California brown
pelican, which is also an endangered species, feeds
in that channel. And that species, for some
reason, is never thought about or considered.
Please remember the pelicans as well.

So you asked for some specific
mitigations because obviously, no matter what thing
you choose -- if you do choose one of these and not
the no-action alternative -- you will have obvious
disruptions to the community and to the
environment, et cetera.

Some of the mitigations that I would
suggest need to be looked at is that extraction
shaft site on Hurricane. That is a city parcel of
land. If you do this project, and when you're
done, that parcel of land ought to be rezoned into
open space. Don't sell it for more development.

That area is highly overdeveloped
already. They need some open space, and the
habitat there at the lagoon needs open space around
it as well. There are two underdeveloped lots
which also could be likewise rezoned for open
space. They're also owned by the City.

And in the Playa Del Rey neighborhood,
you obviously are going to be causing some major disruptions. One of the biggest concerns we have there is Toes Beach Dunes, which is threatened by development, and the Patriot Homes Site. Perhaps the City could have some mitigation by helping put some money towards the purchase of those sites.

Thank you.

MS. BROWN: DeDe Audet.

MS. AUDET: Thank you. My name is DeDe Audet, and I live in Venice, California. I think what has been mentioned by Maria and alluded to by Mark, we need to know in considering environmental impacts exactly what density the current pipe size and pumping is designed for and what density the items you are proposing will provide for.

I think it's very important information in order for people to make decisions. If we're going to open up streets or the beach or whatever it is, let's make sure we're doing it right, and we don't have to come back in 20 years and open it up again. So let's try to look ahead and give these people that information so that they know, because they're the ones that are going to have to pay for it. And let them know exactly what they're going
And on the issue of flooding, I don’t know how long you fellas have been around here, but I can tell you I have seen rowboats on Washington Street. We get some pretty darn good floods. And there’s some very important people living down there off of the speedway on both sides of the channel, and I’m sure that I will hear from them at the Grassroots Venice Neighborhood Council.

So please, try to get comprehensive information. That’s what we need. Comprehensive. Because I just don’t see how people can understand the environmental impact without knowing what you intend to serve. Thank you.

MS. BROWN: Roy Van de Hoek.

MR. VAN DE HOEK: I support what she just said and your other speakers who all seem to have an opinion of being generally opposed to the project. My name is Roy Van de Hoek for the record. I’m a citizen and resident on Vista Del Rey Avenue and will be very close to the routes. I’m also a biologist and EIR expert-in-process.

I would like to see you do no-action alternative that is twice as long -- written twice as many words, twice as much text as your preferred
alternative. And what I want you to focus on is your no-action alternative is how doing no changing of the pipes will have to cause politicians to address no growth, more density of population of people.

Doing a no-action alternative that shows the limit of how much sewage can go, will show that you can't go anymore to three-story, four-story, five-story buildings anymore around the marina; that you can't think about 20 years from now doubling the population or tripling the population on the west side, because that's what this is facilitating by having such a large sewage line there.

It's a piecemealing. And to define what "piecemealing" is, when we first sent troops in the '50s with Eisenhower to Vietnam, that was just a few advisors. Then Kennedy sent more; that was the second piecemealing. Then Johnson expanded; that was piecemealing. Now we have 100,000-plus troops and 70,000 killed. That's all part of piecemealing.

And what you're doing here is earlier on before you started approving the towers in the marina and started approving more and more
high-rises all over, that's causing you now to want
to do this project. You should have done this at
the time when you were approving that. And that's
how you piecemealed it, and now you have a mess.
And now you're going to have an even bigger mess.

If you do this, the only route I see
feasible for travel and other reasons is to go down
Via Marina, get rid of that city tree of
Los Angeles in that median and that grassy lawn,
and run it right down the middle of that. Do a cut
and fill, cheaper route, and you won't affect
traffic. The cars will still be able to go back
and forth.

If you have to go down to one lane each
way, it needs to have an impact on traffic. If you
try to go down Pacific, you're only going to have
the width of one lane and cars won't be able to go.
Once your route hits the marina, it should go at
whatever angle is required and then hit the beach.

But that doesn't mean I'm advocating that
as a preferred alternative. I think the no-action
alternative is my opinion. I think there will be
an abundance of biological impacts, and I think you
haven't anticipated all of them.

There is going to be a lot of other
federal listed, state listed, state sensitive,
federal sensitive, other animals and plants that
are proposed for listing in the future. And I'll
give you more written comments later.

MR. DELKHASTE: Thank you very much.

MS. DURRELL: Thank you all. Do we have
any more comment cards?

MR. VANGESEL: If you do a cut and cover
method, they said they could do 50 feet a day
excavation. I did the calculations for you, and I
can run them through. That's 22 construction
trucks that they have to get in between 9:00 a.m.
and 3:30. 'Can't be possible.

So they're saying they can do 50 feet of
excavation a day with cut and cover. Technically,
physically, that's not possible, at least along
Pacific. The alternative along Via Marina, it's
absolutely possible because there is a lot more
room. So I could, again, explain in detail.

So one of the other comments that I'd
like to point out is you have the Via Marina and
Pacific Avenue cut and cover at the same exact
costs. Well, I don't know anything that costs
exactly the same out there. Via Marina is
definitely a cheaper method to go.
You have it required to do boring
underneath Hurricane to get across the street --
the channel. Why you can't do a cut and cover to
make that less expensive, unknown to me. You can
cut off that canal, have it float around, cut the
other half. We do it all the time in construction.
Couple items: If you do cut and cover,
couple of things that should be required. As a
minimum, cover all vehicles after they're filled
with dirt. They're driving through this
neighborhood. Right now that is not a requirement.
Once you go, they use this document to
write the technical specs. So we want that, and we
don't want it -- as it says here, "or do something
else." We want it standard. No "or" allowed.
You have on page 5-128 a whole bunch of
line items. We should make these very clear so the
people that write the technical specs, they should
do this. Everyday the trenches have to be covered.
Right now that is not in there as a requirement.
Everyday, have your trucking operation, as you
mention and discuss, in your construction method.
Make it a requirement.
Make it a bullet item, like you said --
like you said in your construction thing. 9:00 to
3:30 so it will not impact the residents in the neighborhood. That's what you discussed that you'd like to see happen, but you don't make it a requirement by making it a bullet item. Make it a bullet item. We all know in the EIR, it becomes a requirement.

The City does and different organizations have such things as special assessments so that if a contractor breaks any of these rules, he gets fined. If you want to make sure, put it in here as a requirement in the EIR that you will have special assessment language put into the contract so that if the contractor breaks any of these rules -- doesn't have his truck covered, works outside the proper hours, doesn't park in the right location -- he gets a fine.

Another one is similar things for such things as noise and vibration to disturb the residents. The City may argue that such things have never been done. I can guarantee you -- I work for MTA. We put it in our jobs because we want to make sure when we build things that the resident is happy. We did this on the project to build the orange line. We had assessments of over $200,000 to our contractor when he was annoying the
neighbors. I hope the City does the same thing.

MS. DURRELL: Thank you. We are going to
conclude our public comment period. I'm sorry that
I strayed away from the rules.

MR. VAN DE HOEK: You allowed him to
speak, and he got the longest amount of time. I
appreciate that you were nice to do that.

MS. DURRELL: I did lay out the ground
rules at the beginning that you had to fill out the
comment card, and you had that opportunity. We are
taking comments through March 17th.

MR. VAN DE HOEK: I don't believe this is
fair. This process needs to start all over again.

If you're going to allow one person to have a
second comment, I deserve and earn a second
comment.

To add and supplement to doing a negative
or no-action alternative and making it twice as
long, I want you to, in that twice as long, have
ten pages about how our piece of mind will be
heightened by not doing the project; that we will
enjoy no new noise.

We will -- all these positive things that
will happen under no-action that none of the other
alternatives can compare to -- how it will be
quiet, how we will be able to continue our lives
the way they are right now, that we won't have to
think about more people coming, that we'll have
nature and the sunrises and dusk, that everything
will be so much more beautiful and just give it --
you call it the no-action alternative, which makes
it sound negative, but the no-action alternative
needs to be written maybe five times longer than
all the other alternatives together.

And just talk about how beautiful it's
going to be if this project doesn't happen. We now
have the highest number of pelicans anywhere in
California, from the Mexican border to San Luis
Obispo -- 2,200 pelicans. We have -- you add up
all the other pelicans in Southern California, and
for six months of the year, Playa Del Rey and
Marina Del Rey have the highest number of pelicans
anywhere on the west coast. And that might be
harmed.

So please do 30 pages of the brown
pelicans ecology. And have a team of five brown
pelican experts who aren't paid by you, but
volunteer to step forward and write independent
reports from the Federal government to say that it
would be better not to have the project and how
good it would be for nature and for all of us.

MR. DELKHAST: Thank you.

MS. DURRELL: Anyone else have comments?

MS. KAPP: My name is Carol Kapp. I would like to ask about cut and cover being used along the beach. Then I would like to make a couple of housekeeping suggestions, because I know that something is going to happen.

I like Mark's idea and Mr. Van de Hoek's about maybe nothing, but I believe that the Argonaut newspaper serves our community quite well. And I believe that the staff from this project should have to make, at the minimum, a bi-weekly report to the community about what's going on, about what the contractor did or did not do, and how contractual issues are being resolved, and just really keep us up to date. I think that would be really good.

I also think that we need to have another community meeting in this room at night so that whatever the last-minute changes are -- unless we get a whole nother EIR -- could be made public.

And also, that the LAPD, the LAFD, life guards, and hospital should be invited so that all these safety providing people know what they're going to need to
possibly come up with at any time during the three
to five-year program that's going to be going on.
And then I would also like to ask that if
this does go by people's homes, that these people
have a tax break. Yes, I think that they should
not have to pay taxes, at least prorated for the
months that they're put through whatever hell is
going on. And I am being very serious about it.

Thank you.

MS. DURRELL: Okay. I think everyone has
had a second opportunity to be heard. We
appreciate that. Again, this -- I'm sorry. You're
going to make a statement?

MR. KRAUCH: I'd like to take my three
minutes that I earlier relinquished. Carol Kapp
mentioned the Argonaut. Twice in the last 25
years, the Argonaut, because of excessive rains, I
have read this. And I want somebody up here, maybe
Dotty, to verify this:

At Farragut Avenue in Culver City,
legally, when it's raining excessively, there's a
legal right for the sewer system, which comes from
the valley through the Hollywood tunnel -- they put
that in in the '50s. They can release anything.

If the Hyperion reaches an over-capacity
of so much, they open that up, and all the sewage
from the valley comes right down. Is that true?
Can you explain what is true on that subject?
MS. DURRELL: Okay. We will be on hand.
Again, we have an EIR copy here if you'd like to
review it. We have all kinds of handouts for you.
Again, the deadline for your comments and
writing would be March 17th by the close of
business. We appreciate you coming out. We know
how important this is to you, and we appreciate
your feedback. Thank you very much.
11.5 RESPONSES TO COMMENTS

Responses were developed by the Lead Agency (City of Los Angeles) in accordance with Section 15088 of the CEQA Guidelines. They address environmental issues in the comments and follow the comment identification convention found in Table 11-1.

Response to Comment ALGN-1: Preferred Alignment - Beach

Several residents in the area of the proposed project indicate their support for the beach alternative as the environmentally superior alternative.

As required by CEQA, the EIR identifies an environmentally superior alternative (see Section 6.0, page 6-3 of the Draft EIR). The Draft EIR concludes that:

“Based upon the outcome of the impact analysis for this project, it has been determined that the environmentally superior alternative is the mined tunnel Alternative #4 (Inland Alignment). This alternative would impose the least number of impacts to environmental resources, and would significantly reduce construction related impacts such as traffic and parking congestion and noise and vibration. The proposed alignment, as shown on Figure 4.3-10, would begin at launch shaft #2 located in Vista Del Mar and run due north toward the pumping plant on Hurricane Street and tie in at the #10 receptor shaft. Although the deep mined tunnel would run directly under existing dwellings and facilities in some locations, great care would be taken to insure that wherever possible, the alignment would follow existing rights of way. For those portions of the alignment that would require tunneling under existing dwellings and/or facilities, the City would work with those who are within the proposed alignment to fully understand the construction methodology, to secure proper right of way access, and to provide compensation for the right of way.”

This conclusion is based on an objective analysis based on the documentation and analysis provided in the EIR and does not support a preference for the beach alignment.

CEQA does not require decision-makers to approve the environmentally superior alternative identified in the EIR, but does require the decision-maker to determine findings that support any decision not to approve the environmentally superior alternative identified in the EIR. As noted in the EIR, the City’s Department of Public Works has not identified a preferred alignment; rather, the Department is relying on the Draft and Final EIR, including public comments on these documents, to provide the City’s decision makers (the Board of Public Works and the City Council) with information sufficient to weigh the effects of each alternative alignment prior to making a final decision on the project alignment.

In conclusion, the analysis provided in the EIR provides a detailed description of the impacts of alternatives, including the beach alignment. No additional analysis or research is necessary regarding impacts due to the beach alignment to the project area.
Response to Comment ALGN-2: Preferred Alignment – Non-beach

The California Coastal Commission stated that its concern with the beach alignment is due to the potential for erosion caused by a rising sea level over the life of the project. As noted more specifically in response to comment CLI-1, Climate Change, the EIR analyzes the potential impacts caused by beach erosion and the potential risk to the force main if it is constructed along the beach. The EIR evaluates the potential alignments without a recommendation for the selection of one alignment over another. Specifically, section 2.3.1 (page 2-10 of the EIR) notes that:

“A preferred alternative for the project has not been determined at this time. Equal analysis has been given to each alternative associated with the Project, allowing for a decision to be made in accordance with CEQA Guidelines, which states that sufficient information must be provided to allow meaningful evaluation, analysis, and comparison of the proposed Project.”

However, as required by CEQA, the EIR identifies an environmentally superior alternative, which is not the beach alignment, but the mined tunnel Alternative #4 (Inland Alignment); see Section 6.2, page 6-3 in the Draft EIR which states:

“This alternative would impose the least number of impacts to environmental resources, and would significantly reduce construction related impacts such as traffic and parking congestion and noise and vibration. . . . Although the deep mined tunnel would run directly under existing dwellings and facilities in some locations, great care would be taken to insure that wherever possible, the alignment would follow existing rights of way. For those portions of the alignment that would require tunneling under existing dwellings and/or facilities, the city would work with those who are within the proposed alignment to fully understand the construction methodology, to secure proper right of way access, and to provide compensation for the right of way."

The concerns of the Coastal Commission are reasonable and consistent with the impact analysis provided in the EIR. The City’s decision-makers, the Public Works Commission and the City Council, will consider the EIR and weigh the comments of the Coastal Commission, the public and other agencies in selecting which alternative alignment to approve.

In conclusion, the analysis provided in the EIR provides a detailed description of potential impacts from all alternatives, including non-beach alignments. No additional analysis or research is necessary regarding impacts of this alternative to the project.

Response to Comment ALT-1: Alternative – No Project Analysis

The comment asserts that the No Project Alternative would limit future development and growth in the area served by the Venice Pumping Plant Dual Force Main Project (VPP).
Under the No Project Alternative, no new pipelines would be installed and the sewer system would continue to operate in the current manner. Neither the No Project Alternative nor the other alternatives under consideration and evaluated in the EIR would either induce or limit growth. As noted in the EIR, analysis of the No Project Alternative (see Section 6.2 of the Draft EIR), the No Project Alternative could result in potentially significant adverse effects to the environment due to the existing sewer force main’s current lack of conveyance capacity and inability to perform regularly scheduled maintenance on the existing force main. In addition, an overflow of untreated wastewater into the Ballona Lagoon and areas surrounding the project could result from the No Project Alternative because of the age and condition of the existing main from the VPP which, in turn, could cause substantial harm to the environment. The proposed new force main is not designed to accommodate increased development in the areas served by the VPP, beyond that contained in approved land use plans; the objective of the proposed new force main is to ensure that the outflow from the VPP can be safely conveyed to the City’s Hyperion Treatment Plan by having a new force main that is less likely to leak and/or break which would result in untreated sewage in the area’s underground environment and, perhaps, the local ocean waterfront and creeks, lagoons, and other surface waterways. Finally, the amount of sewage that would flow in the proposed new force main would be largely determined by the capacity of the VPP. There are no plans to increase the capacity of the VPP and therefore, the potential growth-inducing impacts of the project are limited.

In conclusion, the analysis provided in the EIR provides a detailed description of a range of project alternatives and notes existing conditions, conditions during construction of each alternative, and conditions following project completion. No additional analysis or research is necessary regarding impacts to the project area from project alternatives.

**Response to Comment ALT-2: Alternative – New Alternative**

Three comments were received requesting consideration of additional alternatives.

The Department of Public Works has considered and compared a reasonable range of alternatives in the EIR. The Department did conduct a preliminary analysis of a larger number of alternatives that were screened prior to selection of alternatives for detailed analysis in the EIR. These additional alternatives were rejected for various reasons including: substantial increased construction costs; non-availability of right-of-way for construction; and the need to acquire additional land. The preliminary analysis prepared by the City for the project, as presented in the Initial Study, (and provided as Appendix A to the Draft EIR), focused on and was limited to feasible alternatives in terms of cost, right-of-way, and technical or engineering characteristics. The EIR evaluates and compares the alternatives identified in the Initial Study and the EIR scoping process. The alternatives analysis in the EIR allows for a decision to be made in accordance with CEQA Guidelines, which states that sufficient information must be provided to allow meaningful evaluation, analysis, and comparison of alternatives to the proposed project. Based upon the analysis conducted of the alternatives identified in the EIR, the cut-and-cover method of construction for two of the proposed alignments was deemed not viable; therefore, a detailed impacts analysis is not provided for them. The environmentally
superior alternative is identified as required by CEQA. A matrix displaying the major characteristics and significant environmental effects of each alternative is provided in Section 8.0 of the Draft EIR, which may be used by the public and decision-makers to make comparisons prior to selecting the preferred alternative alignment for the VPP dual force main sewer.

In conclusion, the analysis provided in the EIR provides a detailed description of current conditions, conditions during construction of the project alternatives, and impacts following project completion. No additional analysis or research is necessary regarding impacts from project alternatives, and an additional alternative is not required.

**Response to Comment ALT-3: Alternatives – Alternatives Bias**

The Department of Public Works has no bias for one alternative over another. As stated in the Draft EIR, there is no preferred alternative at the present time. The purpose of the alternatives analysis provided in the EIR is to analyze the impacts of alternatives to provide a basis by which the public and decision-makers can compare feasible project alternatives that would achieve the project objectives described in the EIR; (see Section 2.2, page 2-1, of the Draft EIR). The process prescribed by CEQA for the preparation of a Draft EIR, and ultimately the Final EIR, provides for review by objective experts within local, regional, state, and federal agencies and the public to ensure that the Draft EIR and Final EIR provide accurate, current, and applicable data, as well as ensure that the impact analysis is accurate and consistent with state-of-the-art environmental analysis methodologies. As noted in other written comments received by the City in response to the Draft EIR, these agencies did not find any bias in the analysis, nor did they negatively comment on the conclusions reached in the EIR’s impact analysis. Finally, as prescribed by CEQA, the Initial Study, Draft EIR, and Final EIR are subject to public review and comment. The purpose of this public review is to ensure that the documents provide answers to substantive comments by the public and that issues of concern to the public are not overlooked and are given due consideration. As noted in several public comments, the Department of Public Works’ EIR process provides an opportunity for the public to offer their comments and raise questions. The Department of Public Works has seriously considered the comments made during the EIR scoping process and the comments made on the Draft EIR. Public concerns have been seriously considered both in the preparation of the Draft EIR as well as in the preparation of these responses to comments.

**Responses to Comment ALT-4: Alternative – New Beach “Cut and Cover” Alternative**

An additional alternative is requested—specifically, the use of the cut-and-cover construction method for the beach alignment of the new force main. As noted in the Draft EIR (see Section 4.1.1 and Alternatives, Section 6.0), cut-and-cover construction is a very common method of linear pipeline construction and replacement. However, with the cut-and-cover approach, major construction activities could be limited to within relatively short segments of about 1,000 feet at any given time (see Figure 4.1-1, Cut-and-Cover Construction). This alternative was determined to be not viable for the
Dockweiler Beach Alignment because the method would result in a relatively shallow sewer, which could be vulnerable to damage from future coastal erosion processes. This alternative, therefore, is not addressed in the EIR and its inclusion would not result in a reduction of project-related impacts.

In conclusion, the analysis provided in the EIR provides a detailed description of alternatives to the project. No additional analysis or research is necessary regarding impacts to the environment in the project area.

**Response to Comment AQ-1: Air Quality – Odor**

Based on the operational characteristics, the proposed project is not likely to impede the progress of the SCAQMD in complying with federal and state ambient air quality standards, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors. A significant air quality impact is not expected due to air releases from force main valves because they are expected to be rare, involve only small quantities of trapped air, and would dissipate quickly. The existing force main in Dockweiler Beach, which has been in continuous operation since it was built in 1960, has two air release valves (one opposite Culver Boulevard and another opposite Yawl Street). These have not caused any significant air quality impact. As noted in Section 5.2.3.2 of the Draft EIR (Air Quality Operational Impacts), the proposed project is anticipated to emit minimal odors. Once operational, the proposed project would operate with minimal need for on-site maintenance under normal conditions. The total amounts of emissions from maintenance worker vehicle exhaust are considered negligible and would not have a significant impact on air quality.

In conclusion, the analysis provided in the Draft EIR provides a detailed description of current conditions and conditions during construction of the project and following project completion. No additional analysis or research is necessary regarding project-related air quality impacts in the project area.

**Response to Comment BIO-1: Biology**

Section 5.3.3 (see pages 5-20 through 5-25 of the Draft EIR) provides substantial discussion of the plant and animal communities in the project area, including an analysis of the habitat for both the least tern and the El Segundo Blue butterfly. The identification and analysis of potential impacts describes the proximity of their habitat to the construction areas of each alternative (including alternative alignments and alternative construction methods). Recognizing potential environmental impacts during construction of these habitats, a series of mitigation measures are identified to reduce the impacts to a less than significant level (see Section 5.3.5 which states that if the mitigation measures are implemented successfully, “no unavoidable adverse impacts on biological resources are expected as a result of the proposed project.”). The City’s mitigation monitoring program, as a requirement of CEQA, would provide the means to ensure the implementation of mitigation measures.
In conclusion, the analysis provided in the EIR provides a detailed description of current conditions, and conditions during construction of the project and following project completion. No additional analysis or research is necessary regarding impacts to biological resources in the project area.

**Response to CLI-1: Climate Change – Rising Sea Level**

The Coastal Commission expressed concern that “in a situation of rising sea level and increased coastal erosion, the sewer line could, in a few years, be attacked by waves and require a revetment or other coastal protection structure.” The City acknowledges this possible impact to the beach and the potential impact on both the existing force main and the potential alignment of the new force main on the beach. Such beach erosion would be comparable to that resulting from a tsunami. The Draft EIR (page 5-74) notes the potential beach erosion could result from a tsunami:

“It is well known that a tsunami can cause substantial erosion and scour on the shore. For example the 1960 Chilean tsunami scoured out the port entrance by more than 30 feet at Kesen-numa Port in Japan. Although the pipeline would be buried at depths no shallower than 10 feet below the surface, the possibility of damage to the proposed pipeline cannot be disregarded. A catastrophic tsunami could result in erosion of the surficial soils covering the proposed pipeline, primarily along the proposed Dockweiler Beach Alignment alternative.”

The potential short-term impact to the beach from a tsunami would be comparable to the potential long-term effects from a rise in sea level. The existing line has been in use for nearly 50 years (since 1958) and the proposed new force main is expected to have a comparable life-span. If sea levels do rise in the next 30 to 50 years, the City would take necessary steps to develop a new route for the force main. The Coastal Commission’s concerns are addressed in the Tsunami Analysis in the EIR. As noted in the Draft EIR (see Section 5.6.4, page 5-77), the potential damage to the proposed force main cannot be disregarded and mitigation measure GEO-5 is recommended:

“**GEO-5 Tsunami** –A tsunami could result in erosion of the surficial soils covering the proposed pipeline, primarily along the proposed Dockweiler Beach Alignment. Proper design and construction of the Project components, including erosion control measures or choosing an alternate alignment off of the beach, would reduce impacts from a tsunami to less than significant levels.”

In addition, consideration of potential beach erosion contributes to the conclusion in the EIR that the Beach Alignment Alternative is not the environmentally superior alternative. In conclusion, the analysis provided in the EIR provides a detailed description of current conditions, and conditions during construction of the project and following project completion. No additional analysis or research is necessary regarding impacts from beach erosion in the project area.

**Response to Comments CON-1: Construction – Parking**
The EIR includes an analysis of construction-phase parking impacts for each alternative alignment. For example, on page 5-43 of the Draft EIR the analysis states that “During construction, two-way traffic could be maintained along Hurricane Street by displacing parking along Hurricane Street (approximately 17 spaces on the north side and 10 spaces on the south side) and northbound traffic would be detoured to Speedway Avenue where necessary. One-way traffic would be maintained along the west side of Pacific Avenue (southbound movement). Temporary closure of the northbound lane on Pacific Avenue would require northbound traffic to use Outrigger Street or another parallel east-west roadway to reach Speedway Avenue.”

The identified impacts would be mitigated to less than significant levels by the measures identified in the Draft EIR (see page 5-52). The mitigation measures relating to the identified potential parking impacts include:

“TRA-1: For each construction site, a construction traffic management plan shall be prepared and submitted to the City Department of Transportation for review and approval prior to the start of any construction work. This plan shall include such elements as the designation of haul routes for construction-related trucks, the location of access to the construction site, any driveway turning movement restrictions, temporary traffic control devices or flagmen, travel time restrictions for construction-related traffic to avoid peak travel periods on selected roadways, and designated staging and parking areas for workers and equipment (emphasis added). Where construction would occur within a public street ROW, including during the open-trench construction activities for all six combinations of Marina Del Rey and Playa Del Rey alignment alternatives and at the short cut-and-cover portion on both ends of the two full-length tunnel alternatives (Dockweiler Beach alignment and Dockweiler Beach to LAX Shaft alignment), the following mitigation measures would also apply:”

With the implementation of these mitigation measures, the parking-related impacts of the project’s construction would be reduced to less than significant levels.

In conclusion, the analysis provided in the EIR provides a detailed description of current conditions, future conditions during construction of the project and following project completion. No additional analysis is necessary regarding construction-related parking impacts.

**Response to Comment CON-2: Construction – Schedule**

The construction schedule (again, as provided in the Draft EIR in Table 4.2-1) has been developed by the City’s Department of Public Works and reflects the complexity of the project. The schedule is a realistic projection of the time to complete each phase of construction. Specifically, as noted in the Draft EIR (see page 4-6), “In an effort to provide accurate information regarding the length of time associated with these impacts, Table 4.2-1 outlines the estimated duration of time it would take to install the sewer for each of the proposed alignment alternatives.
As presented in the Draft EIR (page 7-4), the “VPP Dual Force Main Project would involve construction activities occurring simultaneously at a number of surface sites along the Project alignment. Construction of the VPP Dual Force Main Project may be occurring in the same general time and space as other projects in the area. In these instances, surface construction activities from both sets of projects could produce cumulative traffic effects which may be significant, depending upon a range of factors including the specific location involved and the precise nature of the conditions created by the dual construction activity (see Traffic-Related Project Construction Schedule in Table 4.2-1). Special coordination efforts may be necessary to reduce the combined effects to an acceptable level. Overall, significant cumulative impacts are not anticipated.”

In conclusion, the analysis provided in the EIR provides a detailed description of construction schedules under for the proposed project and no additional analysis is necessary regarding construction schedules.

**Response to Comment CON-3: Construction - Traffic**

The information requested in this comment is provided in the Draft EIR. Regarding Pacific Avenue, the Draft EIR notes that “construction of the proposed (3,000-foot-long) Pacific Avenue alignment would involve both open-trench construction and tunnel-boring. As noted in the Draft EIR (see Section 5.4.3.3, page 5-43), the temporary localized impacts on the transportation system would occur due to the combined effects of additional construction traffic and closure of travel lanes on roadways, leading to reductions in roadway capacity. The open-trench construction method would be performed to construct the Pacific Avenue alignment, including the intersection of Pacific Avenue and Via Marina. As further described in the EIR, during construction one-way traffic would be maintained along the west side of Pacific Avenue (southbound movement). Temporary closure of the northbound lane on Pacific Avenue would require northbound traffic to use Outrigger Street or another parallel east-west roadway to reach Speedway Avenue.

The City’s Initial Study, provided as Appendix A to the Draft EIR, identified impacts related to street closure for construction of the new force main, regardless of alignment; such impacts include short-term rerouting of traffic around construction sites. Specifically, as noted in the Draft EIR (see Section 5.4.3.3, Project Impacts) “the construction-period impacts for each of the build alternatives are assessed in this section. This analysis includes general traffic impacts caused by construction traffic and reduction of roadway segment capacities, if any, and localized impacts related to access, pedestrian movement, bus routes and stops, and on- and off-street parking in the vicinity of each of the construction sites.” The identification and analysis of impacts included evaluation of impacts related to alternative force main alignments and alternative construction methods.

The following summarizes the impact analysis provided in the Draft EIR for each alignment and for each construction method; see Section 5.4.3 for the full text of the impact analysis:
**Marquesas Way/Via Marina Alternative Alignment:** It was assumed that the entire Marquesas Way/Via Marina alignment would be performed simultaneously by two teams of construction workers (for trench and tunneling) as the worst-case scenario, resulting in peak trip generation estimates of 45 worker trips and no construction truck trips during the morning and afternoon peak hour. The projected incremental change in V/C ratio during construction of the Marquesas/Via Marina alignment for the nine analyzed intersections and 23 analyzed roadway segments are identified in Appendix E of the Draft EIR. Project trips generated by the construction of the entire Marquesas Way/Via Marina alignment in combination with either of the two Playa Del Rey alignments would not result in an adverse impact at any of the four study intersections north of the Marina Del Rey Channel in Marina Del Rey, but adverse impact could occur at Via Marina south of Tahiti Way (one of the 23 analyzed roadway segments) in Marina Del Rey with a southbound lane closure.

**Pacific Avenue Alternative Alignment:** Similar to the development of project trip generation estimates for the other two alternative Marina Del Rey alignments, the projected incremental change in V/C ratio during construction of the beach alignment for the nine analyzed intersections and the 23 analyzed roadway segments would not result in adverse construction-period impacts at any of the analyzed study intersections or roadway segments north of the Marina Del Rey Channel in Marina Del Rey.

**Channel Segment:** The Marina Del Rey and Ballona Creek channels would be crossed using the tunnel-boring method. For any combination of north and south alignments, the launching shaft would be on the southern shore of the channel, while the receiving shaft would be located on the northern shore. Depending on which combination of north and south alignments is selected, the channel crossing would be about 1,300-1,900 feet long. As the tunnel-boring would occur at the same time as the open-trench construction, a discussion of the project impacts for the channel segments is included in the discussion above and in the Draft EIR’s discussion of the two project alignment alternatives in the Playa Del Rey segment.

Regarding the traffic impacts associated with the alternative construction methods, the analysis provided in the Draft EIR, beginning on page 5-49, addresses each alternative and concludes the following:

1. **Cut-and-Cover Construction** – A discussion of the project impacts due to the cut-and-cover construction method is included in the Draft EIR for each of the three project alignment alternatives in the Marina Del Rey area and for each of the two Project alignment alternatives in the Playa Del Rey area. This method would be used in conjunction with the tunnel-boring method in several project alternatives and would result in greater circulation impacts than the large-diameter tunneling alternatives.
(2) **Tunnel-boring** – A discussion of the project impacts due to the tunnel-boring construction method is included in the EIR for each of the three project alignment alternatives in the Marina Del Rey area and for each of the two project alignment alternatives in the Playa Del Rey area. This method would be used in conjunction with the cut-and-cover method in several project alternatives and would result in greater circulation impacts than the large-diameter tunneling alternatives.

(3) **Large-Diameter Tunneling** – A discussion of the project impacts due to the use of large-diameter tunneling is included in the alternatives in the EIR for each of the four proposed larger tunnel alignment alternatives. These alternatives would result in fewer circulation impacts than those employing cut-and-cover and tunnel-boring methods. Based on this analysis, the project alternatives are not expected to result in significant impacts to the transportation system upon completion of the proposed sewer facilities. The construction of the sewer facilities, however, could result in temporary adverse impacts on traffic and parking, the introduction of temporary bicycle, pedestrian, or vehicular safety hazards, and the temporary relocation of access points to public transit. During the various construction phases of each project alignment, travel by construction workers and truck hauling of supplies and disposal would generate trips on the regional and local transportation system surrounding each construction shaft site or zone. These trips would represent a temporary increase during defined phases of construction and, upon completion of construction, would cease. Adverse short-term impacts could result, but because they would be of limited duration, they are not considered to be significant. In addition, temporary lane closure due to open-trench construction activities for the six project combinations of Marina Del Rey and Playa Del Rey alignment alternatives and the short open-and-cut section for the Dockweiler Beach full-length tunnel alternative and the Dockweiler Beach-LAX Shaft full-length alternative would result in adverse impacts on up to four streets. Surface construction, however, would result in only temporary transportation disruption, which while adverse, would not be considered significant. Similarly, during the construction period at locations where construction activity would occur within public street Right of Way (ROW) or in areas accessible to the public (i.e., locations other than within the site of the VPP), increased safety risks to vehicles, bicyclists and pedestrians could result from open-trench construction activities within or adjacent to affected sites due to narrowed lanes, altered travel patterns, and temporarily obstructed sidewalks. Adverse short-term impacts could result, but because they would be of limited duration, they are not considered to be significant for any of the 10 project alignment alternatives. Finally, construction of 8 of the 10 proposed alignment alternatives involving the open-trench method and tunnel-boring method would result in temporary loss of parking spaces either at the public parking lot adjacent to the channel or at on-street locations. This would be considered adverse, but not significant because of the temporary nature of the impact.

As shown above, the EIR presents a detailed analysis of traffic impacts of the proposed project. For each of the impacts identified in the analysis, the mitigation measures
provided in Section 5.4.4 would reduce potential significant impacts to less than significant levels. Key mitigation measures to reduce impacts to less than significant levels are summarized as follows (the full text of the mitigation measures is provided in the Draft EIR, page 5-50):

**TRA-1** For each construction site, a construction traffic management plan shall be prepared and submitted to the City Department of Transportation for review and approval prior to the start of any construction work. This plan shall include such elements as:

- the designation of haul routes for construction-related trucks;
- the location of access to the construction site;
- any driveway turning movement restrictions, temporary traffic control devices or flagmen;
- travel time restrictions for construction-related traffic to avoid peak travel periods on selected roadways; and
- designated staging and parking areas for workers and equipment.

Where construction would occur within a public street ROW, including during the open-trench construction activities for all six combinations of Marina Del Rey and Playa Del Rey alignment alternatives, and at the short cut-and-cover portion on both ends of the two full-length tunnel alternatives (Dockweiler Beach alignment and Dockweiler Beach to LAX Shaft alignment), the following mitigation measures would also apply:

**TRA-2** A site-specific construction work site traffic control plan shall be prepared for each construction site and submitted to the LADOT for review and approval prior to the start of any construction work. This plan shall include such elements as:

- the location of any lane closures;
- restricted hours during which lane closures would not be allowed;
- local traffic detours;
- protective devices and traffic controls (such as barricades, cones, flagmen, lights, warning beacons, temporary traffic signals, warning signs); and
- access to abutting properties, and provisions to maintain emergency access through construction work areas.

**TRA-3** Fully utilize available street space to minimize lane reductions on affected streets, including elimination of on-street parking where necessary. Implement left-turn restrictions as appropriate on restriped street segments to facilitate the movement of through traffic. Eliminate travel lanes only when absolutely necessary.

**TRA-4** Provide signage indicating alternative pedestrian and bicycle access routes where existing facilities would be affected.
TRA-5 Provide advance notice to any affected residents, businesses and property owners in the vicinity of each construction site, and, where existing property access will be reduced, identify alternative means of access.

TRA-6 Coordinate with emergency service providers, (police, fire, ambulance and paramedic services), to provide advance notice of any lane closures, construction hours and changes to local access, and to identify alternative routes where appropriate.

TRA-7 Coordinate with public transit providers to provide advance notice of any lane closures, construction hours and, where necessary, to identify sites for temporary bus stops within a reasonable walking distance of any displaced bus stops.

In conclusion, the analysis provided in the EIR provides a detailed description of current conditions and conditions during construction of the project and following project completion. No additional analysis is necessary regarding construction-related traffic impacts.

Response to Comment CON-4: Construction – Beach Access

The beach is a valuable asset in the Venice community. The EIR addresses the short-term impacts to beach access as well as impacts to views of the beach during project construction. The analysis and documentation in the Draft EIR (Section 5.11.3, page 5-132) notes that “although the proposed Project would not involve permanent adverse impacts to recreational facilities and public resources, site-specific adverse impacts may occur during the construction period. Beach access at Hurricane Street would be affected by the extraction shaft, and cut-and-cover-construction along Hurricane Street. This area is used for passive recreation and volleyball.”

The EIR evaluates the short-term construction impacts and notes that “a public beach access path starts near the construction/laydown site and runs along the east side of Ballona Lagoon to the south. From the beginning of this path, the construction/laydown site would be within the foreground. The push site shaft would be in a vacant lot. The construction activities here would be in the foreground of residences along the northeast side of Via Dolce at its intersection with Marquesas Way.”

Public access to the beach would be directed around any construction site, and therefore beach access would not be interrupted, limited or made impossible during the construction phase of the project. No additional analysis or mitigation is necessary as the impact of construction on beach access would be less than significant.

Response to Comment CON-5: Construction – Timing

See response to Comment CON-2, Construction Schedule, regarding the schedule for the phases of project construction. The Draft EIR (Table 4.2-1) provides detailed information regarding the time of each phase and the relationship between the schedules.
for each phase. No additional information is necessary to describe the planned schedule for the project. The schedule would be used by the Department of Public Works and the contractor(s) selected by the City to construct the new force main to monitor the progress of the project.

In conclusion, the analysis provided in the EIR provides a detailed description of the timing of phases of construction. No additional analysis is necessary regarding construction timing.

**Response to Comment CON-6: Construction - Noise**

The EIR provides a detailed analysis of the existing noise environment in the area of VPP and each of proposed alignments and construction methods being considered by the City for the new force main (Section 5-10 of the Draft EIR). A part of the analysis, the criteria to determine a construction-related noise impact is presented, noting the following:

- Depending upon the method of construction chosen, short-term increases in noise from construction would result from the operation of heavy equipment needed to construct the tunnels or cut, dig and re-fill the trenches and insert the pipeline for the Project. The City of Los Angeles regulates noise from construction, and the contractor would be required to adhere to these regulations.

- The City of Los Angeles Noise Ordinance (L.A.M.C. Section 112.03) regulates construction noise by referencing Section 41.40 of the Los Angeles Municipal Code. Section 41.40(a) prohibits use of any noise-producing device or powered equipment for construction or repair work on any building or structure between the hours of 9:00 p.m. and 7:00 a.m. on weekdays. Section 41.40(c) prohibits non-emergency grading or construction, other than by an individual homeowner on his/her own single-family residence, on or within 500 feet of residential land before 8:00 a.m. and after 6:00 p.m. on Saturdays and national holidays, and at any time on Sundays. These sections also prohibit operation, repair, or servicing of construction equipment and job-site delivering of construction materials during those hours.

- The County of Los Angeles addresses noise from construction activities in Section 12.08.440. The operation of any tools used for construction or related activities such that a noise disturbance is created at a residential or commercial land use is prohibited on weekdays between 7:00 p.m. and 7:00 a.m. or at any time on Sundays or holidays. The noise standards listed in Table 5.10-5 are applicable to construction activities conducted within the unincorporated County.

In addition to the analysis of construction-related noise impacts, the Draft EIR also identifies and evaluates impacts relating to operations and construction vibration; (Section 5.10.2, page 5-119). The City of Los Angeles does not have a quantified standard or threshold for vibration that is applicable to the construction or operations phase of this Project. The County of Los Angeles addresses vibration in Section 12.08.560 of the County Code. Any device is prohibited that creates vibration above the
threshold of perception at a distance of 150 feet from the source if the source is on a public space or public ROW. The threshold of perception is defined as 0.01 inch per second over the range of 1 to 100 Hertz.

To reduce construction-related noise impacts and post-construction noise impacts to less than significant levels, the EIR states that “potential construction noise mitigation measures may include limiting the hours of noisy construction activities to daytime hours near residences and other sensitive receptors. Other measures could include limiting the number of construction equipment operating at any one time.” Following are the specific project-related construction noise mitigation measures (page 5-128 of the Draft EIR) that should be followed, to the extent feasible:

- **NOI-1** Trucks shall be limited to designated truck routes and shall avoid residential streets to the extent practicable.

- **NOI-2** Temporary soundwall barriers shall be erected for launch and receiving pits and large-diameter tunnel shaft work areas. Such soundwall barriers shall be of a sufficient height, length, and configuration so as to provide substantial noise reduction and effectively block the line-of-sight between nearby noise sensitive receivers and the work zone.

- **NOI-3** Electrically powered equipment shall be used instead of pneumatic, or internal combustion powered equipment where feasible.

- **NOI-4** Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors.

- **NOI-5** Construction site and haul-road speed limits shall be established and enforced during the construction period.

- **NOI-6** The use of noise-producing signals, including horns, whistles, alarms, and bells shall be for safety warning purposes only.

- **NOI-7** No project-related public address or music system shall be audible at any adjacent receptor.

- **NOI-8** The on-site construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the Bureau of Engineering shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.

- **NOI-9** The contractor shall develop a project noise control plan, which shall have been approved by the owner or designated noise control professional and implemented prior to commencement of any construction activity.
Since no vibration impacts are predicted for operation of the pipeline, no mitigation measures are recommended or necessary for the operational phase of the project.

In conclusion, the analysis provided in the EIR provides a detailed description of current conditions, future conditions during construction of the project and following project completion. No additional analysis is necessary regarding construction-related noise impacts.

Response to Comment CON-7: Construction – Management

The City’s future contractor for the construction of the proposed new force main would prepare a construction management program that would, among other requirements of the City, identify a project manager and support staff to direct all phases of construction. The City would approve the contractor’s project management staff based on the construction manager’s experience, qualifications and commitment to the assignment. The construction management program would also identify the communications between the City and the contractor during all phases of project construction to ensure that the City is kept informed of construction activities, any problems or delays encountered by the contractor, and adherence and compliance with the agreed-upon schedule for completion of the project. In effect, the construction management plan is an assurance to the City, its residents, and in particular to those who live and work in proximity to the project area that the project is proceeding as planned and that City-imposed mitigation measures are implemented at appropriate phases of construction.

Response to Comment CON-8: Construction – Vibration

As noted in more detail in response to comment NOI-1, the EIR includes an extensive analysis of potential vibration impacts due to project construction; see the noise and vibration analysis is provided in Section 5.10.3 beginning on page 5-119 of the Draft EIR. To address these impacts, several mitigation measures are recommended (see Draft EIR, page 5-128). With the implementation of these mitigation measures, noise and vibration impacts will be reduced to a less than significant level. No additional analysis or research is necessary to identify measures to reduce construction noise-related impacts to less than significant levels.

Response to Comment CON-9: Construction – Trench Covering

The description of trench covering for the various alignments under consideration is provided in the Draft EIR; for example, in page 5-43 it is noted that the Pacific Avenue alignment would involve both the open-trench construction and tunnel-boring. The EIR further notes that the “temporary localized impacts on the transportation system would occur due to the combined effects of additional construction traffic and closure of travel lanes on roadways, leading to reductions in roadway capacity.” The analysis provided in the EIR notes that the “open-trench method would be performed to construct the Pacific Avenue alignment in Marina Del Rey, beginning at the VPP on Hurricane Street, proceeding west to Pacific Avenue, and turning south and proceeding along Pacific
Avenue and ending at the receiving shaft for the tunnel-boring construction at the southern end of Pacific Avenue on vacant land west of the Los Angeles County parking lot.”

The potential construction-related impacts to local streets and circulation due to the cut-and-cover construction method can be reduced to less than significant levels by the implementation of mitigation measures identified in the EIR, including TRA-1, TRA-2 and TRA-3. The combined effects of these three mitigation measures would reduce potential significant impacts to a less than significant level by requiring that the City prepare for each construction site a construction traffic management plan, and that the plan be prepared and submitted to the City Department of Transportation for review and approval prior to the start of any construction work.

In conclusion, the EIR addresses the issue of construction impacts, including trench covering methods, providing an analysis and documentation of the impact and identified mitigation measures so that the potential impact is reduced to a less than significant level.

**Response to Comment EIR-1: Recirculation of EIR**

CEQA requires the recirculation of an EIR in cases in which the EIR needs to be revised extensively to address substantial new information that may require additional analysis, to provide additional analysis of issues not addressed in the EIR, when there are substantial changes in the project description, and when there have been errors in the noticing and distribution of the EIR for public review. None of these reasons for recirculation of the EIR are relevant to this EIR. As shown in the comments on the adequacy of the EIR and in these responses to comments, no additional analysis is required to respond to comments; these responses to comments on the EIR result in clarification of information already contained in the EIR and do not require any substantive change in the project description or the analysis of issues addressed in the EIR.

**Response to Comment EIR-2: Extend Review Period of EIR**

CEQA specifies a minimum review period of 30 days for a Draft EIR. For this project, and as permitted by CEQA, the City provided a longer review period of 45 days. In addition, the public review and the opportunity to provide comments to the City on the adequacy of the Draft EIR also included the public hearing on the Draft EIR, which was held on February 23, 2006. In essence, the public was provided ample opportunities to review and comment on the Draft EIR. In addition, and again consistent with CEQA, the City would hold public hearings on this Final EIR. This process provides additional time for public review and comments on the EIR, and proposed Responses to Comments well beyond the 45-day review period for the EIR.

**Response to Comment EIR-3: Piecemeal CEQA Analysis**

The EIR has been prepared consistent with the state’s CEQA Guidelines that ensure that impact analysis in not piecemeal, but is comprehensive in both the description of the
proposed project and the analysis of impacts. Specifically, the City prepared an Initial Study to identify potential environmental impacts; this analysis provided the basis for the City to identify potentially significant impacts and also provided a basis for the Notice of Preparation (NOP) of the EIR. The Initial Study was also used by the City in the public scoping meetings for preparation of the EIR. Both the NOP and the public scoping meeting provided opportunities for public comment on the range of environmental issues to be analyzed in the EIR. The EIR provides analysis of all issues identified in the Initial Study as well issues identified by public agencies in response to the NOP and issues identified by the public at the public scoping meeting. For example, at the scoping meeting the public requested that the EIR address the issue of risk to pedestrians and bicyclists during the cut-and-cover phase of project construction. This issue is evaluated in the EIR. The impact analysis is not piecemeal nor is it selective. The project description provides a substantial description of the project’s objectives, needs and purpose, an identification of alternatives to achieve the objectives and analysis of the alternatives, and all other requirements of CEQA. Based on the project description, no analysis has been deferred.

One commentor has suggested that the proposed project is part of a larger project, the continued development of 3-4 story residential development in Venice. This new development is consistent with the General Plan for the area. The General Plan has been subject to previous environmental review, prior to its adoption. The environmental effects of the 3-4 story residential development now occurring in the Venice area were analyzed the General Plan EIR. Thus, the Venice Force Main Project does not represent piecemeal CEQA analysis of the larger General Plan build-out.

Response to Comment EIR-4: Mitigation Measures

The state’s CEQA Guidelines allow lead agencies to substitute mitigation measures during project’s development. In brief, a lead agency, such as the City of Los Angeles, may substitute one mitigation measure for another if: (a) the new measure is equivalent or more effective; (b) the City considers the matter at a public hearings; and (c) the City adopts a written finding that the new measure is equivalent or more effective, and that the new mitigation measure would not cause a significant effect. At this time no substitution is proposed or is being considered. The mitigation measures provided in the EIR are the measures that the City proposes to implement to reduce project-related impacts to less than significant levels.

Response to Comment EMG-1: Emergency Access

At the public workshop conducted by the City during the scoping period for the EIR the issue of emergency access during construction was raised by several people. The EIR acknowledges that during construction roadways may be narrowed to accommodate construction equipment and that lanes may be closed on a temporary basis. To address this, the EIR includes a mitigation measure to ensure that emergency access is not interrupted during project construction; specifically, mitigation measure TRA-2 provides that:
“A site-specific construction work site traffic control plan shall be prepared for each construction site and submitted to the LADOT for review and approval prior to the start of any construction work. This plan shall include such elements as the location of any lane closures, restricted hours during which lane closures would not be allowed, local traffic detours, protective devices and traffic controls (such as barricades, cones, flagmen, lights, warning beacons, temporary traffic signals, warning signs), access to abutting properties, and provisions to maintain emergency access through construction work areas.”

With this measure, potential adverse impacts would be reduced to a less than significant level and no further analysis or mitigation is necessary. No additional analysis is necessary to describe the potential impacts of the project on emergency access.

**Response to Comment FLD-1: Flooding**

Flooding is a potential event throughout the City during major storms. Low-lying coastal areas and communities, such as Venice, are especially subject to flooding. The proposed project would not affect existing areas subject to flooding, nor increase the amount of water that would aggravate or increase flooding risks, frequency or areas subject to flooding by contributing to surface water sources. The project would not increase the impervious ground coverage in the area which could contribute to flooding. The existing force main and the proposed new force main are underground utilities and the proposed project would be protected from the effects of surface flooding. In extreme and unusual circumstances, the VPP may be shut-down in major flooding events. Therefore, the risks to the project from flooding, and the risks to the community of an increased flooding risk due to the project, would be less than significant.

In conclusion, the analysis provided in the EIR provides a detailed description of current conditions and conditions during construction of the project and following project completion. No additional analysis or research is necessary regarding flooding impacts in the project area.

**Response to Comment GEO-1: Geology – Settling and Dewatering**

Page 5-75 of the Draft EIR provide a description of the potential for settling/landslides in the area and potential effects on the proposed project. As noted in the Draft EIR the:

“The potential for landslides induced by seismic shaking is not anticipated to pose a significant seismic hazard to the proposed Project. The proposed Project lies in a relatively flat-lying area where landslides would not be expected to occur. In addition, the Potential Liquefaction Hazard Zone map for the Venice quadrangle, referenced as Figure 5.6-4, indicates that the Project elements do not lie within areas designated as having the potential for earthquake-induced land sliding (CDMG, 1999). These are areas where previous occurrence of landslide movement, or local topographic, geologic, geotechnical and subsurface water conditions indicate a potential for permanent ground displacement during a
seismic event. Landslides from other mechanisms are discussed further in this section.”

To reduce the risk of landslides related to the project; the following mitigation measures have been identified in the Draft EIR (page 5-76) with emphasis added to note the specific relationship to landslides and settling:

“GEO-2 Liquefaction and Differential Seismic Settlement – Mitigation measures with respect to liquefaction and differential seismic settlement hazards are considered necessary for the proposed Project. Site-specific geotechnical and geological investigations that focus on these potential hazards will be performed as part of the design studies. Design and construction of the proposed Project will include mitigation measures, such as flexible connections that can accommodate differential settlement, compaction grouting to densify the soils, or structural anchors to secure the pipeline. The mitigation measures will reduce impacts from liquefaction and differential seismic settlement to less than significant.”

Regarding dewatering, the Draft EIR’s analysis (see pages 5-74 and 5-75) notes that:

“... dewatering of the excavations made during construction of the proposed Project could result in potentially damaging subsidence adjacent to the construction area. The Project area is in proximity of the Playa Del Rey oil field, which is used by the Southern California Gas Company as a natural gas storage facility. Although a detailed study has not been performed for this report, it is anticipated that the continued operations at the natural gas storage facility would not result in measurable subsidence in the Project area, barring such extraction in the future. Because of the potential for subsidence to occur as a result of construction dewatering, subsidence is considered a potential geologic hazard to the proposed Project.”

The mitigation measure relating specifically to subsidence and dewatering-related impacts is as follows:

“GEO-3 Subsidence – Mitigation measures with respect to subsidence as a result of construction dewatering are considered necessary for the proposed Project. Site-specific geotechnical and geological investigations that focus on this potential hazard will be performed as part of the design studies. Design and construction of the proposed Project will include mitigation measures, such as a watertight excavation support system to minimize groundwater pumping or constructing the pipeline in a “wet” excavation. The mitigation measures will reduce impacts from subsidence to less than significant.”

In conclusion, the EIR addresses the issues of settling and landslides, providing documentation and analysis of the potential risk, and identifying mitigation measures so that the potential impact is reduced to a less than significant level.
Response to Comment GEO-2: Geology - Liquefaction

The identification of liquefaction as a project-related risk was identified by the City in the proposed project’s Initial Study. The City’s Venice Community Plan identified liquefaction as a risk to persons and property, including the proposed project and similar utilities. The EIR provides an extensive discussion of liquefaction potential in the Venice community and the potential effect of liquefaction on the proposed project.

The description of the liquefaction risk in the Draft EIR (page 5-74) provides a clear analysis for the public and decision-makers of the potential risk. As noted in the Draft EIR:

“Liquefaction is defined as significant and relatively sudden reduction in stiffness and shear strength of saturated sandy soils caused by a seismically induced increase in pore water pressures. Recent geotechnical studies performed for the proposed project encountered saturated sandy soils at relatively shallow depths along most of the Pacific Avenue alignment (URS, 2000a; 2000b). Standard Penetration Test (SPT) blow counts indicate the consistency of some of these sandy soils is relatively loose and therefore prone to liquefaction.

“The California Geological Survey has identified the project area as being in a potential liquefaction hazard zone (CDMG, 1999). Because of the combination of sands and shallow groundwater in the project area, liquefaction is considered a significant potential seismic hazard along all of the alternative alignments for the Project.”

In addition, the EIR (page 5-74) notes that:

“The potential for landslides induced by seismic shaking is not anticipated to pose a significant seismic hazard to the proposed Project. The proposed Project lies in a relatively flat-lying area where landslides would not be expected to occur. In addition, the Potential Liquefaction Hazard Zone map for the Venice quadrangle, referenced as Figure 5.6-4, indicates that the Project elements do not lie within areas designated as having the potential for earthquake-induced landsliding (CDMG, 1999). These are areas where previous occurrence of landslide movement, or local topographic, geologic, geotechnical and subsurface water conditions indicate a potential for permanent ground displacement during a seismic event.”

The Draft EIR (page 5-76) identifies two mitigation measures that address the potential significant impact of liquefaction on the proposed project:

“GEO-2 Liquefaction and Differential Seismic Settlement – Mitigation measures with respect to liquefaction and differential seismic settlement hazards are considered necessary for the proposed Project. Site-specific geotechnical and geological investigations that focus on these potential hazards would be performed as part of the design studies. Design and construction of the proposed
Project would include mitigation measures, such as flexible connections that can accommodate differential settlement, compaction grouting to densify the soils, or structural anchors to secure the pipeline. The mitigation measures would reduce impacts from liquefaction and differential seismic settlement to less than significant.

“GEO-3 Subsidence” – Mitigation measures with respect to subsidence as a result of construction dewatering are considered necessary for the proposed Project. Site-specific geotechnical and geological investigations that focus on this potential hazard will be performed as part of the design studies. Design and construction of the proposed Project will include mitigation measures, such as a watertight excavation support system to minimize groundwater pumping or constructing the pipeline in a “wet” excavation. The mitigation measures will reduce impacts from subsidence to less than significant.”

With the implementation of proper engineering practices and mitigation measures prior to and during construction, no unavoidable or adverse impacts on the geologic footprint of this area from the project are expected. In addition, cumulative impacts on the geologic footprint of this area are not expected from the project with the implementation of proper engineering practices and mitigation measure prior to and during construction. No additional analysis is necessary to address the potential impact, nor are additional mitigation measures necessary to reduce the potential liquefaction impacts to less than significant levels.

In conclusion, the analysis provided in the EIR provides a detailed description of current conditions and conditions during construction and following project completion. No additional analysis or research is necessary regarding liquefaction, seismic settlement and subsidence impacts in the project area.

Response to Comment GEO-3: Geology - Seismic

As with the analysis provided in the EIR of liquefaction risk (see previous response to Comment GEO-2), the EIR provides extensive analysis and documentation of seismic risks to the project and the surrounding area. The EIR documents that the potential seismic risks are potentially significant and require mitigation measures. The following measure is proposed to mitigate potentially significant geologic hazards to less than significant levels for the project components. No unavoidable adverse impacts that cannot be mitigated have been identified for any of the project components. The mitigation measure is more accurately described as a project design feature and is presented in the Draft EIR (page 5-75), and are repeated again below for clarity:

“GEO-1 Earthquake Ground Shaking” – The proposed Project and associated facilities will likely be subjected to moderate or strong earthquake motions in their lifetime. The components of the proposed project will be designed and constructed to the seismic design requirements for ground shaking specified in the UBC for Seismic Zone 4 at a minimum. Proper design and construction of the
Project components will reduce impacts from ground shaking to less than significant.”

Response to Comment GRWTH-1: Growth-inducing Impacts

As required by CEQA, the EIR provides an analysis of the potential for the project to induce growth in the area. In simple terms, a project would induce growth if an obstacle or barrier to future growth is removed. That is not the case with the proposed new force main from the VPP. As noted in the Draft EIR discussion of growth-inducing impacts (Section, 7.1 Growth-Inducing Impacts), Section 15126.2(d) of the CEQA Guidelines requires a discussion of the growth-inducing impacts of the proposed project. Growth-inducing impacts are secondary, or indirect, impacts that could occur as a result of the project that are manifested as changes in land use patterns, population density and growth rates, as well as related effects on traffic, public services, air, water, biological and other environmental resources. Over the past several decades, the Bureau of Engineering has designed and constructed numerous wastewater conveyance system projects. The issue of potential growth inducement resulting from an increase in sewer conveyance capacity has been raised in the past by various individuals and organizations. The primary issue is whether the provision of sewer capacity induces growth, which would otherwise not occur.

The proposed project would not change permitted land use in the community and surrounding areas; the project is the construction of new force main from the VPP to the Hyperion Treatment Plant. The size of the proposed force main is based on the existing and projected flow of sewage from the VPP and is not based on achieving an increase in capacity to address future growth that is not consistent with the City of Los Angeles’ land use plans for the area. The development of land in the City is governed by the land use and zoning designations of particular parcels. Unless conditional use permits, density transfers or variances are obtained from the Planning Department, development must conform to the type and density designated for that parcel. Zoning reflects the land use policies contained in the General Plan. Again, no change in the permitted land uses, or density of development, is part of the proposed project.

As noted in the Draft EIR (see Section 7.1, page 7-1), the decision of a land owner to develop a single parcel or numerous parcels of land may be based on personal or economic reasons. Whether personal, economic or both, the availability of wastewater conveyance capacity is not likely to be a consideration in the decision to develop. Once the decision to develop a parcel has been made, permission to connect to the wastewater collection system must be obtained as part of the building permit process. A sewer connection permit can only be obtained if adequate capacity to serve the proposed development is available. Sewer connection and other building permit fees are charged in proportion to the density of development proposed. The high sewer connection fees and other building permit fees associated with the most intensive levels of development increase the costs of developing land in the City and can be considered economic disincentives to development. In a mature, urbanized area such as Los Angeles which is
adequately served by sewage treatment facilities, the provision of wastewater conveyance capacity would not induce land development that would not otherwise occur.

Wastewater conveyance capacity is required to accommodate the increases in wastewater flows associated with the population increases. The provision of wastewater conveyance capacity would neither induce natural population growth nor in-migration. The Southern California Association of Governments (SCAG), the regional planning agency, has established the policy that conveyance systems, including interceptors, are not subject to its air quality conformity procedures, because of the absence of their effects on population growth.

SCAG, which includes the City of Los Angeles among its member jurisdictions, has prepared the Regional Comprehensive Plan and Guide and the Growth Management Plan. These plans address regional growth and related issues. In addition, the City of Los Angeles’ General Plan governs land use development within its jurisdiction.

The Los Angeles City Planning Department revised the General Plan and the new plan, termed the “General Plan Framework,” is intended to balance land use development, transportation, projected future population and projected future employment within the City of Los Angeles. Wastewater conveyance capacity is an infrastructure component of the urban environment that is necessary to safely accommodate the needs of existing and future populations.

In conclusion, the analysis provided in the EIR provides a detailed description of current water quality conditions, future conditions during construction of the project and following project completion and no additional analysis is necessary regarding construction-related wastewater related growth inducing impacts.

**Response to Comment GRWTH-2: Hyperion Plant**

The commentor asks if the Hyperion Plant can handle the increased flows of the sewer line in the context of the large expansive housing projects that the City continues to approve. As noted in response to comment GRWTH-1, above, and in the EIR the provision of wastewater conveyance capacity, in and of itself, would not induce population growth or land use development. Rather, wastewater conveyance capacity would allow population growth to occur consistent with the City’s adopted General Plan Framework while minimizing sewage spills and the associated environmental and health and safety problems. Future land uses would be at densities consistent with the Framework and generally not occur in densities higher than those allowed by the City’s land use planning process. Any development projects beyond the scope of the City’s General Plan would undergo subsequent environmental analysis (including analysis of impacts to the wastewater system) and would have to be approved by the City Council. In wastewater planning, the sizing of collection and treatment facilities, as well as the system’s overall configuration, is dependent on the future system-wide flow and the distribution of that flow within the system. The VPP Dual Force Main Project would not induce growth in population or changes in land use which would not otherwise occur. No
significant growth-inducing impacts are, therefore, associated with the project and no additional research or analysis is necessary to address this issue.

Response to Comment NOI-1: Noise – Noise Curtain Mitigation Measures

The Draft EIR analyzes the noise and vibration impacts that would result from project construction (see Section 5.10.3 beginning on page 5-119). The construction phase would produce significant noise impacts on sensitive receptors in the vicinity of construction. To address these impacts, several mitigation measures are recommended (see Draft EIR, page 5-128). With the implementation of these mitigation measures, noise and vibration impacts would be reduced to a less than significant level. Other mitigation measures, such as the noise curtain recommended in this comment, are not necessary to mitigate impacts that would otherwise be mitigated by less costly and even more effective measures. Therefore, no additional research or analysis is necessary to identify measures to reduce construction noise-related impacts to less than significant levels.

Response to Comment NOI-2: Noise – Pacific Avenue Noise Mitigation Measures

Potential project-related noise impacts are analyzed in detail in the EIR. The Draft EIR (page 5-118) notes that existing City noise requirements and standards would be met during the project’s construction.

“If any Project alignment alternative exceeded the relevant noise criteria for impact, then noise abatement actions would be considered. Noise from any Project alignment alternative, that is predicted to exceed the criteria for impact under CEQA, would result in a significant adverse effect. In such a case, feasible/effective noise mitigation measures would need to be considered. If feasible/effective mitigation actions were not available, then unavoidable adverse impacts would occur if the particular alternative were to be selected.”

To ensure that the City’s noise standards are met during project construction, mitigation measures are provided in the EIR that are applicable to all project alternatives, including both alternative alignments and alternative construction methods. The Pacific Avenue alignment alternative, if selected by the City, would be subject to noise mitigation measures NOI-1 to NOI-9. These measures would reduce potential significant impacts to less than significant levels. No additional analysis is necessary to identify, analyze and mitigate noise impacts from the proposed project.

Response to Comment OS-1: Open Space – Mitigation

Section 5.9.1 of the Draft EIR describes existing land uses in the project area, clearly describing the open space resources present (such as the beach, the lagoon, and other water ways). Specifically, the Draft EIR notes that: “Existing land uses within the Venice area, extending north from Via Marina Way on the south, consist of six major land-use designations: single- and multi-family residential, commercial, industrial, open space, and public utilities. The proposed alignments north of the Marina Del Rey Channel...
and on the southeast side of the Ballona Lagoon are in areas zoned single and multi-family residential. Areas to the west are zoned open space along the Ballona Lagoon and low to medium residential. The area surrounding the VPP is primarily zoned multi-family residential to the north, and open space on the south along the Ballona Lagoon. Along the alternative alignments south of the channel, and under consideration by the City, the zoning is also primarily residential and light commercial.

The analysis presented in Section 5.9.3 notes that “Because this is a municipal project providing improvements to public facilities through the City of Los Angeles Department of Public Works, this Project would adhere to all local and regional regulatory requirements necessary for the construction of the sewer.” The impact analysis further notes that the “Project is not a land use, nor does it require a change/variance in land use; therefore, there are no impacts to land uses within the Project areas.” The analysis concludes that the “Project could impose temporary construction impacts in the Coastal Transportation Corridor Specific Plan area due to construction-related transport to and from construction areas north of the Marina Del Rey/Ballona Lagoon channels.”

In conclusion, there would be no loss of open space during project construction and no mitigation measures are, therefore, proposed or required.

Response to Comment PRMT-1: Permitting

Section 1.6 of the Draft EIR provides an extensive list of permits for the proposed project in Table 1.6-1. The list of permits includes permits that are necessary for all alignments and construction alternatives evaluated in the EIR, including permits necessary for the Pacific Avenue alignment.

Response to Comment PROJ-1: Project Related – Project Life

The existing force main is nearly 50 years old. One objective of the proposed project is to supplement that existing force main with a new line that has more carrying capacity but which would also be more reliable in handling maximum flows without leaking or breaking which would result in significant contamination of the area’s groundwater and surface water resources. The Department of Public Works anticipates the new force main would have a life-span greater than 50 years. Following development of the new force main the Department would be able to inspect the existing line to determine what repairs can be made to extend its life further. With the proposed project, adequate carrying capacity would be provided for more than 50 years. There is little likelihood that additional construction to the force mains would be necessary for at least 50 years. Therefore, the impacts identified and analyzed in the EIR are the only impacts that can be reasonably foreseen at this time.

Response to Comment PROJ-2: Project Related – Capacity of Force Main

The EIR provides detailed information regarding the capacity of the existing force main, the capacity of the proposed new force main and the reasons why the City has proposed
the use of a tandem system of forces mains from the Venice Pumping Plan. As noted on page 2-1 and page 2-5 of the Draft EIR:

“The VPP is the largest pumping plant in the City of Los Angeles. It collects sewage from the coastal areas of the City through an existing 48-inch pipeline and transports it to the Hyperion Treatment Plant in Playa Del Rey (see Figure 2.2-1). Over the years, the existing pipeline that conveys sewage to the treatment plant has gradually approached maximum capacity placing substantial strain on the system forcing the water level in the wet-well of the VPP basement to rise.

“The City of Los Angeles first identified the need for additional sewer capacity during the heavy storms of 1995 when sewage and infiltrated storm water in the sewage system exceeded the capacity of the existing 48-inch line, creating a potentially serious human and environmental health risk. Although the pumping plant had all five pumps running during peak rainfall, the existing downstream sewer force main that runs along the beach could only handle approximately 60 percent of the flows that would otherwise run through the pumps - serving as a bottleneck in the system. The amount of sewage and infiltrated storm water in the sewage system exceeded its capacity, forcing the water level in the wet-well of the VPP to rise. In an effort to prevent potential sewage spillage as a result of an overload situation, the City proposes to install an additional 54-inch pipeline to convey the flows.”

Based on these events that clearly indicate the need for the City to address the capacity of the existing force main, the City proposes the Venice Force Main project. As further noted on page 2-5 of the Draft EIR:

“In addition to the need to provide pipeline capacity to manage peak flows, the new 54-inch force main would be used in tandem with the existing force main; together, the two force mains would provide the necessary capacity to meet current and future peak wet weather flow demands. The project’s intent is to construct a second force main to be used in tandem with the existing force main for the purpose of fulfilling two objectives: expand the capacity of the Coastal Interceptor Sewer’s force main segment from the VPP to a connection in Playa Del Rey in the vicinity of Waterview Street, such that all projected wet weather flows can be safely conveyed without future threats of spilling onto city streets and adjacent surface waters; and to provide force main redundancy to allow for maintenance and rehabilitation of the existing force main and future reciprocal cleaning of each force main during dry weather periods.”

In addition, a critical consideration by the Department of Public Works is the recognition that “the existing 48-inch pipeline was built in 1958 and has been in continuous operation since then. The installation of the proposed 54-inch force main would provide bypassing capability allowing repair and maintenance of the existing pipeline, which is currently not possible” (page 2.5 of the Draft EIR).
In conclusion, the information provided in the EIR clearly describes the reasons why the City is proposing to increase the capacity of force mains from the VPP. No additional analysis is necessary to describe the purpose of the project, its benefits and its characteristics.

**Response to Comment PROJ-3: Project Related: Sewage Spill Plans**

The proposed project seeks to reduce the existing risk of sewage spills (discharge) that may result from the existing force main. First, as noted in the Draft EIR (see Section 7.1, page 7-3) “it is technically infeasible that completion of the proposed Project, within any of the proposed three alternative locations, would cause any unwarranted discharge that would affect the current surface water quality condition. Unless there is a catastrophic event (e.g., high magnitude earthquake) the proposed Project is designed to provide additional mitigation of possible sewage spills from the existing pumping station/sewer main system. Additional wastewater conveyance capacity would allow population growth to occur within the General Plan Framework while minimizing sewage spills and the associated environmental, health and safety problems.

Second, the Department of Public Works requires that all construction projects include requirements that the contractor meet all applicable, local, state and federal requirements to reduce the risk of spills and/or discharge during project construction. This is a contract provision that is supervised by the City on all construction contractors. No additional information or analysis is necessary to illustrate or demonstrate how the City would impose conditions to ensure that sewage spills and/or discharge related impacts would not occur during project construction.

**Response to Comment PROJ-4: Project Related: Sewer Capacity**

See previous responses to comments PROJ-2 regarding the need to ensure adequate capacity of the force mains from the VPP. In addition, the project is limited to construction and operation of an additional force main from the VPP. The project does not provide for additional sewer capacity in the project area nor is the project proposing increasing the capacity of the City’s wastewater treatment system, specifically the Hyperion Treatment Plant.

**Response to Comment PROJ-5: Project Related – Project Updates**

The comments relate to the public’s interest in being kept informed of the status of the project’s planning, design and construction. Although not a CEQA-related requirement nor necessary to reduce or otherwise mitigate environmental impacts, the City would make available to the public brief summaries of project status and periodic mitigating monitoring reports completed by City staff that would indicate status of the project’s progress, the status of the mitigation measures as they are implemented, and the remaining work to be completed by the City and/or its construction contractor.

**Response to Comment PROJ-6: Project Related – Safety Concerns**
The EIR addresses a wide variety of issues identified through the City’s preparation of the Initial Study (provided in full in Appendix A to the Draft EIR) and issues raised by the public at the scoping sessions/workshops prior to the preparation of the EIR. There are a variety of safety concerns; for example, in a broad sense, the protection of the area’s biological communities and habitat is a safety concern. Specific mitigation measures have been identified to reduce those impacts to less than significant levels. Further safety concerns relate to seismic risks and these too have been analyzed in the EIR and mitigation measures have been identified to reduce or mitigate these impacts to less than significant levels. The EIR also describes construction activities, such as exposed trenches and the presence of construction equipment in the project area. Again, mitigation measures have been identified to reduce safety-related issues to less than significant levels. As a result, the issue of public safety has been addressed among the full spectrum of environmental issues and mitigation measures have been identified to reduce safety-related risks to less than significant levels. No additional research or analysis is necessary to address this issue.

Response to Comment PROJ-7: Project Related – Project/Alternatives Cost Information

The purpose of an environmental impact report is to identify and evaluate the environmental effects of the propose project, to identify means to mitigate those impacts, to address alternatives which would meet most of the project objectives and would reduce environmental effects, and above all else, to provide the public and decision-makers with information about the project and project impacts. An environmental impact report is not a cost-benefit study, nor is it intended to provide a detailed cost analysis of the project and project alternatives. Specifically, the effects analyzed under CEQA must be related to a physical change in the environment. Economic and social effects, including costs associated with the proposed project and its alternatives, are not considered environmental effects under CEQA (CEQA Guidelines Section 15064, 15131, et al.). These effects need to be considered in EIRs only if they would lead to an environmental effect. The order of magnitude cost estimates provided in the EIR are intended to give the public and decision-makers information on the comparative feasibility of the alternatives. The EIR, therefore, does not provide information beyond that required by CEQA and no additional information is provided in the Final EIR.

Response to Comment PROJ-8: County Facilities

The proposed project would not require modification to County facilities or operations in the area, such as the in the unincorporated Marina Del Rey area. The County would be informed as the project construction progresses and would be notified of any change that could affect County facilities. Permits to construct and operate the new force main are included in the EIR and, as required for the permits, the County would be notified.

Response to Comment TAX-1: Property Tax Relief

The costs to plan, design, engineer and construct the proposed new force main would be born entirely by the City of Los Angeles’ Department of Public Works. It has long been
the policy of the City not to provide tax relief to businesses, neighbors, residents and property owners in proximity to a public works projects in the form of property tax relief or other monetary compensation for environmental effects of City projects. Rather, as identified in the EIR, it is the City’s responsibility to pay for the implementation of the mitigation measures to reduce adverse impacts to less than significant levels where feasible. The implementation of the mitigation measures would reduce impacts to acceptable levels. As a result, there would be no impacts anticipated from the proposed project that would create financial hardship on the area’s businesses, residents and property owners and no property tax relieve is proposed.

**Response to Comment TRA-1: Traffic**

The comments raise questions regarding the breadth of the traffic impact analysis provided in the EIR and if the analysis accounts for the specific characteristics of the local street system. As described in the Draft EIR (see Circulation, Traffic and Transportation, Section 5.4.1, Environmental Setting), the analysis is based on the existing street network in the area, the current traffic conditions (volume and capacity), and proposed improvements to the street system. The issues raised in this comment are addressed in this section of the EIR. Based on the existing street network, the impacts of the proposed project — particularly the short-term construction impacts of the alternative non-beach alignments — are addressed in detail, including description of potential street and/or lane closures during construction on vehicles, bicyclists and pedestrians. The potentially significant short-term construction-related traffic impacts can be reduced to a less than significant level by the circulation and traffic mitigation measures in the Draft EIR (see Section 5.4.4, beginning on page 5-50). In conclusion, the concerns raised in the comments are consistent with the impacts identified and analyzed in the EIR and these impacts can be mitigated to less than significant levels.

**Response to Comment WQ-1: Water Quality**

One of the objectives of the proposed project is to reduce the potential contamination of the local surface and subsurface water resources that may occur from sewage spills, leaks and, in an extreme case, a break in the existing main leading from the VPP to the Hyperion Treatment Plant. The existing main from the VPP is old and may collapse or rupture creating substantial contamination of the local ground and/or surface water.

As noted in the EIR, all proposed alternatives would cause similar construction and operations impact to the project boundary and adjacent area. The completed project would be in compliance with the NPDES Municipal Separate Storm Sewer System (MS4) Permit and meet the necessary sanitary sewer service standards. Without the installment of the new sanitary sewer main, the current sanitary system would continue to deteriorate and run a high risk of overflowing the system, causing a potential break in the system, and causing a potential health risk to the local waterways. From a hydrology and water quality perspective, all alternatives cause a similar temporary disturbance to the current site conditions. All three proposed alignments cross under the Marina Del Rey Channel and Ballona Creek via tunneling, and the Marquesas Way alignment crosses
under the Grand Canal via tunneling. Tunneling would occur below the bottom of these waterways, and have no effect on the waterways.

The following mitigation measure to the project contained in the EIR would minimize the proposed Project’s impacts on water quality and hydrologic conditions.

- **H/WQ-1** Appropriate Best Management Practices (BMP) measures (sandbags, plastic lining covering storm water inlets, temporary detentions basins, etc.) would be implemented during the construction period to retain excavated soil material on site and minimize the potential risk of contaminated soil being removed off site. Also, monitoring activities would be conducted during the installation of the BMP measures and throughout the construction period.

Provided that all federal, state, and local regulations pertaining to project activities are followed accordingly and storm water prevention plans are implemented and monitored, then the potential for significant or long-term adverse impacts would be avoidable. In conclusion, the analysis provided in the EIR provides a detailed description of current water quality conditions, future conditions during construction of the project and following project completion. No additional analysis is necessary regarding construction-related water quality issues or impacts. Moreover, as noted in the EIR, the project area is not within a sensitive environmental setting. Change to the existing site conditions would be temporary and the site would be restored back to a similar pre-construction condition. Pre- and post-construction hydrologic conditions would be similar and any change in condition would be minimal. All proposed alternatives have similar construction applications and procedures. Therefore, there are no foreseen hydrologic or water quality cumulative or secondary impacts.
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12.0 CLARIFICATIONS AND REVISIONS

This section of the Final EIR is intended to clarify certain elements of the Draft EIR and to identify revisions made after circulation of the draft.

12.1 CLARIFICATIONS
The Environmental Impacts Summary Table presented in the Executive Summary (Table 3.3-1) is intended to provide a simpler and clearer summary than provided in the Impact Analysis Table published in the Draft EIR (Table 6.3-1).

12.2 REVISIONS
During internal review, we discovered that some pages were omitted from Appendix A (Notice of Preparation), C (Air Quality Analysis) and D (Biological Resources), which were published in Appendices Volume I. Therefore, Appendices Volume I has been corrected and reissued with a cover date of December 2007. This correction does not introduce new information, since the information in the appendices was presented in the Draft EIR volume itself. In fact, we received no comments from reviewers expressing concern about the missing pages.
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