Final

SECONDARY TREATMENT AND PLANT IMPROVEMENT PROJECT

Subsequent Environmental Impact Report
SCH: 2004031076

April 2005

Prepared for

Orange County Sanitation District

ESA Environmental Science Associates

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Orange County Sanitation District

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203472

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SUMMARY

The Secondary Treatment and Plant Improvement Project Draft Subsequent Environmental Impact Report (Draft SEIR) for the Orange County Sanitation District (District) was completed and released for public review on January 6, 2005 pursuant to California Environmental Quality Act (CEQA) requirements. The public review period lasted 45 days, officially closing on February 22, 2005. Six comment letters were received on the Draft SEIR.

This document provides copies of comments received and responses to these comments. Copies of all the comment letters are followed by responses to each comment. The comments are referenced numerically by letter and comment number; the comment letters are numbered in sequential order. For example, the first comment in letter A (Southern California Association of Governments) is A-1. Table 1 lists agencies that submitted comments on the SEIR during the comment period.

The Final SEIR for the Secondary Treatment and Plant Improvement Project consists of this response to comments document and the Draft SEIR. The Mitigation Monitoring and Reporting Program (MMRP) for the Secondary Treatment and Plant Improvement Project is included with this response to comments document.

Table 1
List of Comments Received on the SEIR

ID NO.	COMMENTORS AGENCIES/ORGANIZATIONS	RESPONSE PAGE NO.
A	Southern California Association of Governments	16
B	City of Fullerton, Development Services Department	16
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COMMENT LETTERS

LETTER A

SOUTHERN CALIFORNIA
ASSOCIATION of GOVERNMENTS

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2005 FEB -3 PM 2:22
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February 7, 2005

Mr. Jim Herberg
Orange County Sanitation District
P. O. Box 8127
Fountain Valley, CA 92728-7018

RE: SCAG Clearinghouse No. I20050018 Secondary Treatment and Plant Improvement Project (Subsequent EIR)

Dear Mr. Herberg:

Thank you for submitting the **Secondary Treatment and Plant Improvement Project** for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Secondary Treatment and Plant Improvement Project**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A-1

A description of the proposed Project was published in SCAG's **January 1-15, 2005** Intergovernmental Review Clearinghouse Report for public for review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,

MARK BUTALA
Senior Regional Planner
Intergovernmental Review

40 YEARS Resolving Regional Challenges 1965 2005

LETTER B

CITY OF FULLERTON
Development Services Department

February 10, 2005

Jim Herberg
Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708

Subject: Review of Environmental Documents for Secondary Treatment and Plant Improvement Project

Dear Mr. Herberg:

The City of Fullerton has reviewed the Subsequent Environmental Impact Report for the above mentioned project submitted by your agency for our review and comment. The project appears to have no significant environmental impacts to the City of Fullerton, and no comments are being forwarded at this time. **B-1**

Thank you for giving us the opportunity to review the documents and to comment on potential issues that may affect the City of Fullerton. If you should have questions regarding this response, please call me at (714) 738-6884.

Sincerely,

Heather Sowers
Assistant Planner

Cc: Joel Rosen, AICP, Chief Planner

303 West Commonwealth Avenue, Fullerton, California 92832-1775
(714) 738-6540 • Fax (714) 738-3110 • Web Site: www.ci.fullerton.ca.us

LETTER C

City of Huntington Beach

2000 MAIN STREET CALIFORNIA 92648

DEPARTMENT OF PLANNING

Phone 536-5271
Fax 374-1540
374-1648

February 15, 2005

Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708
Attn: Jim Herberg, Engineering Manager

Subject: Draft Subsequent Environmental Impact Report for the Secondary Treatment and Plant Improvement Project

Dear Mr. Herberg:

The City of Huntington Beach has reviewed the DSEIR for the Secondary Treatment and Plant Improvement Project and has the following comments:

1. Air emissions during construction as well as future normal operations of the new facilities are characterized as significant (exceed SCAQMD thresholds) and will result in an unavoidable significant impact even after proposed mitigations. We believe that further reduction of two primary components of air emissions, Nitrogen Oxide and Particulate Matter, can be realized through the use of emulsified diesel fuel, use of other alternative fuels, or after application of combustion exhaust treatment facilities. Although there is a modest additional cost for the use of emulsified diesel fuels, in the order of 30 cents per gallon, we believe that the significance of predicted emission levels justifies consideration of alternate fuels or treatment. We understand that emission reductions would be on the order of 16 to 58 percent for Particulate Matter and 9 to 20 percent for Nitrogen Oxides. C-1

   Consideration should be given to impose conditions on construction contractors requiring the use emulsified diesel fuel, or one of the other proposed alternatives, to achieve emission reductions and provide relief for the impacted residents of Huntington Beach. In addition, the OCSD should require the use of emulsified diesel fuel or combustion exhaust treatment facilities on all trucks used to haul bio-solids from their facilities to disposal sites as part of normal operating conditions.

2. Page S-8, Aesthetics Impact 3.1-1, the following shall be included: A report shall be prepared by a consulting arborist that quantifies, identifies type and size, and analyzes the health of all existing trees impacted by the proposed construction. The report shall recommend how trees that are to remain are to be protected and how far away construction/grading must be kept from the trunk in order to preserve the trees' health. C-2

3. Page S-14, Traffic/Transportation Impact 3.8-1, the following shall be included: The Orange County Sanitation District and/or its construction contractors shall coordinate the development of a truck haul route with the City of Huntington Beach Public Works Department for those portions of the project involving the import or export of material exceeding 5,000 cubic yards. The truck haul route plan shall include the approximate number of truck trips and the streets that will be used as haul routes. It shall specify the hours during which transport activities can occur and the methods and procedures to mitigate construction-related impacts to adjacent residential areas. C-3

4. The following verbiage shall be added to the report:

   "Prior to commencing hauling operations within the City of Huntington Beach, the hauling contractor shall coordinate with the City of Huntington Beach Department of Public Works, in developing a truck haul route and obtaining a hauling permit for the import or export of material. This plan shall include the approximate number of truck trips and the proposed truck haul routes. It shall specify the hours in which transport activities can occur and methods to mitigate construction related impacts to adjacent residents. The plan shall take into consideration any street improvement construction occurring in the vicinity. This plan must be submitted for approval to the City of Huntington Beach Department of Public Works". C-4

5. All truck haul routes within the City of Huntington Beach will be subject to review and approval by the City of Huntington Beach Department of Public Works. C-5

6. It appears that the evaluation of traffic impacts from Plant No. 2 will be primarily based on truck traffic routed along Brookhurst Street. Scenarios must be evaluated which route truck traffic along Pacific Coast Highway and either Beach Boulevard or State Route 55. C-6

7. Page 2-2, Table 2-1, Proposed Improvements Required for Secondary Treatment at Plant Nos. 1 and 2 and Figure 2-2, Site Plan of Proposed Projects for Treatment Plant No. 1, the location of the P1-97 and P1-106 facilities shall take into account the ultimate public street right-of-way for Garfield Avenue. C-7

8. Page 2-9, Plant No. 1 - Fountain Valley, P1-97 Plant No. 1 66kV Substation, the location of the 66kV Substation shall take into account the ultimate public street right-of-way for Garfield Avenue. C-8

9. Page 2-10, Plant No. 1 - Fountain Valley, P1-106 Truck Wash and Relocation of Dewatering Beds at Plant No. 1, this facility shall take into account the ultimate public street right-of-way for Garfield Avenue. C-9

10. Page 3.1-14, Mitigation Measures, Measure 3.1-1, the following shall be included: A report shall be prepared by a consulting arborist that quantifies, identifies type and size, and analyzes the health of all existing trees impacted by the proposed construction. The C-10

report shall recommend how trees that are to remain are to be protected and how far away construction/grading must be kept from the trunk in order to preserve the trees' health. C-10 (cont.)

11. In Section 3.8.1, Treatment Plant No. 2, it is stated that Brookhurst Street carries an ADT between 12,000 and 25,000 from PCH to Garfield Avenue, based on an OCTA flow map. The City of Huntington Beach Traffic Flow Map indicates that there is an ADT of 43,000 in this segment, a 72% difference. Any evaluation of traffic conditions will require obtaining current traffic flow data. C-11

Thank you for the opportunity to comment on the Draft Subsequent EIR for the Secondary Treatment and Plant Improvement Project.

Sincerely,

Jason Kelley
Assistant Planner

LETTER D

DEPARTMENT OF TRANSPORTATION
District 12
3337 Michelson Drive, Suite 380
Irvine, CA 92612-8894

Flex your power!
Be energy efficient!

February 16, 2005

Mr. Jim Herberg
Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA. 92708

File: IGR/CEQA
SCH#: 2004031076
Log #: 1387 A
SR #: 1, I-405

Subject: Subsequent Environmental Impact Report Secondary Treatment and Plant Improvement Project.

Dear Mr. Herberg,

Thank you for the opportunity to review and comment on the **Subsequent Environmental Impact Report Secondary Treatment and Plant Improvement Project.** The proposed project consists of a group of thirteen individual facility projects. In total, six projects are proposed at Plant No.1 and seven projects are proposed at Plant No.2 Two of the projects at Plant No.1 and Plant No.2 involve construction of large new secondary treatment facilities to meet project objectives.

Caltrans District 12 is a reviewing agency on this project, and has the following comments for your consideration.

1. If any project work (e.g. street widening, emergency access improvements, sewer connections, sound walls, stormdrain construction, street connections, etc.) occurs in the vicinity of the Caltrans Right of Way, an encroachment permit would be required and environmental concerns must be addressed. Please coordinate with Caltrans for street and transportation improvements on or near the Caltrans Right of Way. **D-1**

2. All work within the State Right of Way must conform to Caltrans Standard Plans and Standard Specifications for Water Pollution Control, including production of a Water Pollution Control Program (WPCP) or Storm Water Pollution Prevention Plan (SWPPP) as required. The applicant must provide the Permits Branch with a copy of the **SWPPP or WPCP,** including Best Management Practices (BMPs) to be implemented for construction activities impacting the Caltrans Right of Way, as required by the National Pollution Discharge Elimination System (NPDES) Statewide Storm Water Permit for General Construction Activities. The applicant must follow the requirements as described in the attached Water Pollution Control Provisions **(please see attachment).** **D-2**

3. The applicant accepted that the project will generate additional and substantial construction traffic. However, the only measure to minimize the impact, is to avoid peak hour construction whenever feasible. Caltrans would like a more defined construction schedule, and a Traffic Management Plan prepared for the construction peak periods and specific plans to alleviate the impact on Caltrans facility (Freeway I-405, PCH, and affected state intersections). **D-3**

We appreciate the opportunity to comment on this document. If you have any questions or need to contact us, please do not hesitate to call Aileen Kennedy at (949) 724-2239.

Sincerely,

ROBERT F. JOSEPH
Chief of Advanced Planning Branch
District 12

c: Terry Roberts, Office of Planning and Research
Terri Pencovic, Caltrans HQ IGR/Community Planning
Gale McIntyre, District 12 Deputy Director of Planning
Leslie Manderscheid, Environmental Planning
Grace Pina Garrett, Water Quality

ATTACHMENT
CALTRANS DISTRICT 12

WATER POLLUTION CONTROL PROVISIONS

Any runoff draining into Caltrans Right of Way must fully conform to the current discharge requirements of the Regional Water Quality Control Board (RWQCB) to avoid impacting water quality. Permittee shall fully conform to the requirements of the Caltrans Statewide National Pollutant Discharge Elimination System (NPDES) Storm Water Permit, Order No. 99-06-DWQ, NPDES No. CAS000003, adopted by the State Water Resources Control Board (SWRCB) on July 15, 1999, in addition to the BMPs specified in the Caltrans Storm Water Management Plan (SWMP). When applicable, the Permittee will also conform to the requirements of the General NPDES Permit for Construction Activities, Order No. 99-08-DWQ, NPDES No. CAS000002, and any subsequent General Permit in effect at the time of issuance of this Encroachment Permit. These permits regulate storm water and non-storm water discharges associated with year-round construction activities.

Please note that project activities should pay extra attention to storm water pollution control during the "Rainy Season" (October 1st – May 1st) and follow the Water Pollution Control BMPs to minimize impact to receiving waters. Measures must be incorporated to contain all vehicle loads and avoid any tracking of materials, which may fall or blow onto Caltrans Right of Way.

For all projects resulting in 2 hectares (5 acres) or more of soil disturbance or otherwise subject to the NPDES program, the Contractor will develop, implement, and maintain a Storm Water Pollution Prevention Plan (SWPPP) conforming to the requirements of the Caltrans Specification Section 7-1.01G "Water Pollution Control", Caltrans Statewide NPDES Permit, the General NPDES Permit for Construction Activities, and the Caltrans Storm Water Quality Handbooks "Storm Water Pollution Prevention Plan (SWPPP) and Water Pollution Control Program (WPCP) Preparation Manual", and "Construction Site Best Management Practices (BMPs) Manual" effective November 2000, and subsequent revisions. In addition, the SWPPP must conform to the requirements of the SWRCB Resolution No. 2001-046, the Sampling and Analytical Procedures (SAP) Plan.

For all projects resulting in less than 2 hectares (5 acres) of soil disturbance or not otherwise subject to the requirements of the NPDES program, the Contractor will develop, implement, and maintain a Water Pollution Control Program (WPCP) conforming to the requirements of Caltrans Specifications Section 7-1-.01G, "Water Pollution Control", and the Caltrans Storm Water Quality Handbooks "Storm Water Pollution Prevention Plan (SWPPP) and Water Pollution Control Program (WPCP) Preparation Manual", and "Construction Site Best Management Practices (BMPs) Manual" effective November 2000, and subsequent revisions.

Copies of the Permits and the Construction Contractor's Guide and Specifications of the Caltrans Storm Water Quality Handbook may be obtained from the Department of Transportation, Material Operations Branch, Publication Distribution Unit, 1900 Royal Oaks Drive, Sacramento, California 95815, Telephone: (916) 445-3520. Copies of the Permits and Handbook are also available for review at Caltrans District 12, 3347 Michelson Drive, Suite 100, Irvine, California 92612, Telephone: (949) 724-2260. Electronic copies can be found at http://www.dot.ca.gov/hq/construc/stormwater.html

LETTER E

CITY OF FOUNTAIN VALLEY

10200 SLATER AVENUE • FOUNTAIN VALLEY, CA 92708-4736 • (714) 593-4400, FAX: (714) 593-4498

February 22, 2005

Mr. James Herberg
Orange County Sanitation Districts
10844 Ellis Avenue
Fountain Valley, CA 92708

RE: Comments for Draft Subsequent Environmental Impact Report for Plans to Upgrade existing Facilities to Comply with 2020 Secondary Treatment Standards

Dear Mr. Herberg:

The City of Fountain Valley has reviewed the Draft Subsequent Environmental Impact Report (DSEIR) for the associated projects pertaining to the upgrade of existing facilities to comply with the 2020 Secondary Treatment Standards at the Orange County Sanitation Districts (OCSD) facility. Based on our review, staff is providing the following comments:

Comment No. 1

Construction truck traffic must utilize approved truck routes for access to the project site. In the project area, Ellis Avenue is not designated a truck route nor is any portion of Ward Street. Further, Garfield Avenue from Brookhurst Street to the Santa Ana River is not designated a truck route. The City of Fountain Valley allows trucks to drive on city streets not designated as truck routes for point of delivery and access only. Allowing trucks to use city streets is based on using the closest truck route with the shortest distance traveled on streets not designated as a truck route. E-1

In response to the proposed projects, the most direct route with the shortest distance would be from Euclid/I405 intersection to the OCSD Plant No. 1 entrance at the signal at Euclid/I405 SB ramps. This is not only the shortest most direct route but also the one preferred by the City to keep additional truck traffic

off of City streets. This will help alleviate congestion and extraordinary wear and tear on City streets. The only other allowable truck route plan requires trucks to travel from Talbert Avenue to Brookhurst Street south to Garfield then east to the southern most point of entry of OCSD property. No other routes, other than the two listed above, are allowable.

E-1 (cont.)

Comment No. 2

A "roadway impact fee" will be required not only during construction but also on an on-going basis to compensate the City for additional costs to maintain and repair City streets due to excessive truck traffic. The location of the OCSD Plant No. 1 and headquarters in Fountain Valley creates increased wear and tear on City roads that require additional costs for maintenance and repair. The City of Fountain Valley requires fair and equitable compensation to provide for this additional maintenance and repair.

E-2

Thank you for the opportunity to comment on the Draft Subsequent Environmental Impact Report for the proposed upgrade to existing Facilities to comply with 2020 Secondary Treatment Standards. Please notify the City of Fountain Valley regarding subsequent community meetings or public hearings. Should you have any questions regarding the comments, do not hesitate to contact me at (714) 593-4425.

Sincerely,

Robert Franklin
Principal Planner

C: City Manager
Public Works Director
City Engineer

South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

LETTER F

FAXED: FEBRUARY 24, 2005

February 24, 2005

Mr. James D. Herberg
Orange County Sanitation District
10844 Ellis Avenue,
Fountain Valley, CA 92708-7018

Dear Mr. Herberg:

Draft Subsequent Environmental Impact Report (DSEIR) for Secondary Treatment and Plant Improvement Project
Fountain Valley and Huntington Beach

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for allowing additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Subsequent Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Subsequent Environmental Impact Report. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB

ORC050111-04
Control Number

Draft Subsequent Environmental Impact Report (DSEIR) for the Secondary Treatment and Plant Improvement Project: Fountain Valley and Huntington Beach

1. **Cumulative Project Emissions**: Table 3.2-7 on page 3.2-11 presents estimated cumulative project air emissions during 2008. On page 3.2-7 of the DSEIR, the lead agency explains that the table summarizes the construction phase emissions at Plant No. 1 and Plant No. 2, in 2008, "when the greatest cumulative daily air emissions would occur." There are three problems with this table. First, Table 3.2-7 appears to show emissions only from Plant No. 1. Second, the table does not adequately explain where the emission numbers came from. The lead agency should provide footnotes to explain the table. Third, if the emissions exclude emissions from Plant No. 2, there is a likelihood that project emissions may have been underestimated. Please explain or correct these apparent discrepancies in the Final SEIR. In addition, once Table 3.2-7 is corrected, please explain how the sums were derived, including which construction years were used. Some of the columns in Table 3.2-6 are labeled with two years, e.g., 2007-2008, and some are labeled with a single year, e.g., 2008. F-1

2. **Diesel Truck Emissions**: The lead agency notes on page 3.8-1 of the DSEIR that "existing traffic entering (plants 1 and 2) consists of chemical delivery trucks; screenings, grit, and biosolids removal trucks; and the vehicles of employees, construction workers and visitors." The tables in Appendix E show that 126 trucks will be servicing the two plants on a daily basis. This comprises 46 trucks that will be delivering chemicals, 75 trucks that will be transporting biosolids from the two plants, and five trucks that will be carrying grit and screening. The tables in Appendix E show that the trucks that will be transporting the biosolids from the two plants would generate over 1055 pounds of NO_X per day. Please identify measures to reduce these emissions. See comment # 4 below. F-2

3. **CO Hot Spots**: In the discussion on the level of service (LOS) on the roadways affected by the proposed project, the lead agency states on page 3.8-9 of the DSEIR that "if substantial numbers of trucks entered Ellis Avenue or Brookhurst Street during AM peak hours, intersections currently operating at LOS D levels could be reduced to unacceptable LOS." The lead agency does not present any tables showing the LOS at the major intersections adjacent to the two plants. The lead agency needs to show such LOS tables in the FSEIR.

   The lead agency goes on to state on page 3.8-9 that "As part of the project, the (Sanitation) District would avoid soil haul operations during peak traffic periods whenever possible." The lead agency does not provide any information by which to determine whether or not traffic from the proposed project has the potential to create CO hot spots at nearby intersections during non-peak hours. Please note that if the LOS at nearby intersections is at D, E or F during non-peak hours, the proposed project's traffic contributions may cause CO hot spots. Similarly, if F-3

during non-peak hours nearby intersections have a LOS rating of C or greater and traffic from the proposed project increases the LOS rating to the next higher level, CO hotspots could also be generated. As a result, a CO hotspots analysis may be warranted. One way to determine whether or not a CO hotspots analysis is required is for the lead agency to present tables showing the LOS at the major intersections with and without the project. If the LOS tables show that any of the above conditions are met, the lead agency should proceed to do the CO hotspots analysis and present the results in the FSEIR. F-3 (cont.)

4. **Mitigation Measures**: As pointed out by the lead agency on page 3.2-12 of the DSEIR, mobile sources of emissions associated with operation of the treatment plants include chemical delivery trucks, solids haul trucks and employee worker commute. The tables in Appendix E confirm that NO_X emissions from these trucks exceed the SCAQMD significance thresholds. To reduce these emissions, the lead agency has proposed only one mitigation measure, Measure 6.5-1a, which requires contractors to maintain equipment engines in proper tune and to not operate equipment during second stage alerts. The following measures are recommended for the lead agency to consider where applicable or feasible to further reduce NO_X emissions:

- Require the use of alternative clean fuel such as compressed natural gas-powered equipment with oxidation catalysts instead of diesel-powered engines, or if diesel equipment has to be used, use particulate filters, oxidation catalysts and low sulfur diesel as defined in AQMD Rule 431.2, i.e., diesel with less than 15 ppm sulfur content. F-4
- Restrict operation to "clean" trucks, i.e., trucks using low sulfur diesel as defined above.
- Use alternative-fueled yard tractors.
- Restrict idling emissions by using auxiliary power units and electrification.
- Enforce truck parking restrictions.
- Restrict truck traffic on some routes.
- Provide a minimum of 300-meter buffer zone between truck traffic and sensitive receptors.
- Redirect truck route to avoid residential areas or schools.
- Improve traffic flow through signal synchronization.
- Provide electrical sources for service equipment and docking of trucks.
- Install energy-efficient appliances to reduce energy consumption.

Other mitigation measures for consideration by the County can be found in Chapter 11 of the Handbook.

8. **Editorial Comment**: Most of the tables in Appendix E show POV emissions. The acronym POV is not defined either in the foot notes to the tables or in Chapter 7 of the DSEIR which lists all the acronyms and abbreviations. Please define this acronym in the footnotes to the tables and add it to Chapter 7 in the FSEIR. F-5

RESPONSES TO COMMENTS

COMMENT LETTER A: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS, FEBRUARY 7, 2005

Comment A-1

This comment states that the project is not considered regionally significant and that no comments are offered regarding the Draft SEIR. No response is necessary.

COMMENT LETTER B: CITY OF FULLERTON, DEVELOPMENT SERVICES DEPARTMENT, FEBRUARY 10, 2005

Comment B-1

The comment states that the project does not appear to have significant environmental impacts on the City of Fullerton and that no comments are offered regarding the Draft SEIR. No response is necessary.

COMMENT LETTER C: CITY OF HUNTINGTON BEACH, DEPARTMENT OF PLANNING, FEBRUARY 15, 2005

Comment C-1

The comment states that consideration should be given to impose conditions on construction contractors requiring the use of emulsified diesel fuel or other measures to reduce NOx and particulates. The District will encourage the use of alternative fuels by contractors where practical and cost-effective. The District operates a compressed natural gas (CNG) fueling station that is open to the public.

Comment C-2

The comment asks that aesthetic impacts be mitigated by requiring a consulting arborist to prepare a report analyzing the health of trees near the construction area. The District will consult with an arborist should construction occur in the vicinity of existing trees or require tree removal.

Comment C-3

The comment asks the District inform and coordinate with the City of Huntington Beach when hauling loads exceeding 5,000 cubic yards. The comment also requests that the District develop a haul route plan. Please see Mitigation Measure M-6.2-1 below.

Comment C-4

The comment asks how the District will coordinate with the City of Huntington Beach, Department of Public Works to develop truck routes and obtain hauling permits or the import and export of material. The comment requests that the schedule specify number of trucks, hours of transport, mitigation methods related to impacts on residents and shall take into consideration any

street improvement occurring in the vicinity. The City requests this Plan be submitted to the City of Huntington Beach, Department of Public Works for approval. The City also states that a haul permit will be necessary. In regards to the need for the Plan and permit, it should be emphasized that the Draft SEIR identified a minimal amount of daily haul route trips during the peak construction period (2008) at Plant 2. According to Table 3.8-3, the project would generate 10 haul truck trips per day. Thus, the project's potential to disturb local land uses along the truck routes would be minimal. Nonetheless, the project will be required to comply with Measure 6.2-1 (as reworded below), that requires coordination with the City of Huntington Beach on a construction schedule to minimize peak hour impacts from construction traffic. Moreover, as noted in the Mitigation Monitoring Program, attached as an Exhibit to the SEIR, the "implementation procedure" for this measure requires preparation of a "traffic control plan" that would presumably address the issues raised in the comment, including the number of trips, hours of construction, and haul routes. In light of these existing requirements, the additional language and haul truck permit requirement are unnecessary.

In response to this comment, Mitigation Measure M-6.2-1 shall be modified as indicated below.

M-6.2-1 *For each major project or construction period, the District shall complete a detailed construction schedule and haul route plan and notify Caltrans and the Cities of Fountain Valley and Huntington Beach of construction. The District shall submit the schedule and haul route plan to the said Jurisdictions for review and comment. Construction vehicles shall be run on a schedule to minimize truck traffic on arterial highways during peak periods, and to reduce their impediment on street construction.*

Comment C-5

Please see Comment C-4, M-6.2-1.

Comment C-6

Please see Comment C-4, M-6.2-1.

Comment C-7

The comment cites concern over the ultimate public right-of-way for Garfield Avenue. The District does not plan to construct within the existing right-of-way for Garfield Avenue. A copy of the site plans for P1-97 and P1-106 will be sent to the Public Works Departments of the Cities of Fountain Valley and Huntington Beach for information on location of District facilities.

Comment C-8

The comment continues to cite concern for ultimate public right-of-way for Garfield Avenue. Please see Comment C-7.

Comment C-9

The comment continues to cite concern for ultimate public right-of-way for Garfield Avenue. Please see Comment C-7.

Comment C-10

Please refer to Comment C-2.

Comment C-11

The comment questions whether the data in the Draft SEIR Section 3.8 concerning the ADT of Brookhurst Street from the PCH and Garfield Avenue is inaccurate. City records show an ADT of 43,000 while the SEIR indicates that the ADT is 25,000. This comment is correct. The Draft SEIR misstated the ADT for Brookhurst Street between PCH and Garfield Avenue. Caltrans data shows that ADT is approximately 41,000.

COMMENT LETTER D: STATE OF CALIFORNIA, DEPARTMENT OF TRANSPORTATION, FEBRUARY 16, 2005

Comment D-1

The comment states that an encroachment permit would be required and environmental concerns addressed if any project work (e.g. street widening, emergency access improvements, sewer connections, sound walls, storm drain construction, street connections) occurs in the vicinity of the Caltrans Right of Way. This comment pertains to permitting requirements for the project with which the District will comply. The comment does not address the adequacy of the SEIR and does not require further response. Note that the current plan does not require work within the Caltrans Right of Way.

Comment D-2

The comment states all work within Caltrans Right of Way must conform to the Caltrans Standard Plans and Standard Specification for Water Pollution Control, including production of a Water Pollution Control Program (WPCP) or Storm Water Pollution Control (SWPPP) as required. As stated in Comment C-1, this comment pertains to permitting requirements for the project with which the District will comply. Note that the current plan does not require work within the Caltrans Right of Way.

Comment D-3

The comment requests a more defined construction schedule in order to alleviate the impact on Caltrans facilities and states the only measure to minimize the impact on traffic is to avoid construction during peak hours. Please refer to Comment C-4, M-6.2-1.

COMMENT LETTER E: CITY OF FOUNTAIN VALLEY, DEPARTMENT OF PUBLIC WORKS, FEBRUARY 22, 2005

Comment E-1

The comment states all construction traffic must utilize approved truck routes for access to the project site. Ellis Avenue and Ward Street are not a designated truck routes, nor is Garfield Avenue from Brookhurst Street to the Santa Ana River. The designated route will be from the

Euclid/I405 intersection to the OCSD Plant No. 1 entrance at Euclid/I405 SB ramps. Conversely the only other allowable truck route plan requires trucks to travel from Talbert Avenue to Brookhurst Street south to Garfield then east to the southern most point of entry of OCSD property. Construction traffic will be routed as requested by the City of Fountain Valley. Please see Comment C-4, M-6.2-1.

Comment E-2

The comment states a "roadway impact fee" will be required for construction and project operations. Comment noted. As related to the fee it should be noted that neither the PEIR or the SEIR identified any potentially significant impact related to the deterioration of local roadways.

COMMENT LETTER F: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, FEBRUARY 24, 2005

Comment F-1

The comment requests clarification of estimated Project Air Emissions during 2008 presented in Table 3.2-7 on page 3.2-11 and an explanation of single and two year time periods used in Table 3.2-6. The comment poses three issues: (1) one Table 3.2-7 does not appear to show emissions for Plant No.2, (2) the table does not adequately explain where the emission values came from, and (3) if Table 3.2-7 does not show emissions from Plant No. 2, it is likely that project emissions have been underestimated. The comment also asks for clarification of why columns in Table 3.2-6 are labeled with different years.

In response to the first issue, the column labeled "Plant No. 1" is mislabeled in Table 3.2-7. It should be labeled "Cumulative Construction Emissions". Accordingly, construction emissions were not underestimated in the Draft SEIR. The emission values in this table are explained in the text. As stated on Page 3.2-7, Table 3.2-7 shows emissions for the year 2008 because this is the year when the most cumulative daily construction emissions at Plant No. 1 and Plant No. 2 would occur. This page of the text also identifies the models used to estimate emissions and the emission factors used in the calculations. In contrast to Table 3.2-7 which shows cumulative construction emissions in the year with the most construction activities at both plants, Table 3.6-2 shows emissions from each project at Plant No. 1 and Plant No. 2. For each project (e.g. P1-82, P2-90), the table shows construction emissions divided into three phases: clearing, excavation and construction. For each phase, this table identifies during what years these construction activities (and related emissions would occur). This table, for example, shows that for project P1-100, site clearing would occur during 2005 and that excavation and construction would occur in 2006. For P1-100, one of the larger construction projects, this table shows the years in which each of the three phases are scheduled to occur and the emissions associated with construction during this time period.

Comment F-2

The comment notes trucks transporting biosolids from the two plants would generate over 1055 pounds of NOx per day and requests that the EIR identify measures to reduce emissions. Although emissions associated with construction and operation of the proposed project have been determined to be significant and unavoidable, the District will encourage use of alternative fuels

where practical and cost-effective. The District has installed a CNG fueling station adjacent to the biosolids loading facility. Note that projected volumes of biosolids for the proposed project are less than those associated with alternative treatment scenarios proposed in the original Program Environmental Impact Report (PEIR). The reduction in biosolids volumes is due to increased efficiency of the proposed new dewatering equipment.

Comment F-3

The comment states no tables are presently shown for LOS at the major intersections adjacent to the two plants and requests the lead agency show such tables in the FSEIR. The comment also states the lead agency does not provide any information by which to determine whether or not traffic from the proposed project has potential to create CO hot spots at nearby intersections during non-peak hours. The comment requests that a CO hot spots analysis be conducted to assess CO impacts at intersections.

The LOS for the major intersections are stated within the text of 3.8-1 to 3.8-10 of the Draft SEIR, although a table may better layout the information to the reader, the necessary information on LOS is included within the Draft SEIR. LOS is not generally used in EIRs to assess construction impacts. Since the operational traffic impacts of the District are limited, there was no need for this analysis in the Draft SEIR. The commentor should note that Table 3.2-2 presents baseline information regarding CO concentrations. This data shows that over the past five years, the highest 8-hour average CO concentrations have been generally decreasing at the air quality monitoring station closest to the project. The data shows there have been no exceedance of this standard in the past five years and that highest measured concentration in the year 2002 (the last year for which data is published) is slightly more than half the State standard of 9.1 parts per million. Because the data shows that background concentrations are far below the standard, it was not deemed necessary to run the CALINE model to measure CO concentrations. Even if a substantial portion of the traffic was during peak periods, it is doubtful that the model would show enough of an increase to result in a significant impact. Since the District has agreed to mitigate impacts by moving as much traffic as possible to off-peak periods, the District is mitigating this impact to the extent feasible.

Comment F-4

The comment suggests mitigation measures to further reduce NO_x. emissions. The District will consider the suggested measures and encourage implementation where practical and cost-effective.

Comment F-5

Comment suggests the acronym POV to be added to Chapter 7 and defined in the Final SEIR. The following shall be added to DEIR 7-4 as follows:

<u>POV Personal Occupancy Vehicle</u>

SEIR TEXT REVISIONS

INTRODUCTION

The following corrections/clarifications have been made to the Draft SEIR text. These corrections include: minor corrections made by the Draft SEIR authors to improve writing clarity, grammar and consistency; corrections or clarifications requested by a specific commentor; or staff initiated text changes to update information presented in the Draft SEIR. The text revisions are organized by chapter. Deleted text is shown using text with ~~strikeouts~~. Single underlined text is used to show where language has be added to the Final SEIR. Tables added to the SEIR may not be underlined in order to enhance readability.

TEXT REVISIONS

CHAPTER 2, PROJECT DESCRIPTION

In response to District comment, Table 2-1 has been revised:

Table 2-1
Proposed Improvements Required for Secondary Treatment at Plant Nos. 1 and 2

Project	Title	Addressed in PEIR for Scenario 4? (yes/no)	Rehabilitation of Existing Structure or Construction of New Structure	Construction Schedule
Plant No. 1				
P1-82	Activated Sludge Rehabilitation	No	Rehab/New	2005-2006
P1-97	Plant No. 1 66KV Substation	No	New	2005-2007
P1-100	Sludge Digester Rehabilitation at Plant No. 1	Yes – partially[1]	Rehab	2007-2011
P1-101	Sludge Dewatering, Odor Control and primary sludge thickening at Plant No. 1	Yes – partially[2]	New	2008-2010
P1-102	Secondary Activated Sludge Facility 2 at Plant No. 1	Yes	New	2007-2012
P1-106	Truck Wash and Relocation of Dewatering Beds at Plant No. 1	No	New	2006-2007
Plant No. 2				
P2-74	Rehabilitation of the Activated Sludge Plant	Yes	Rehab	2006-2008
P2-80	Primary Treatment Rehab/Refurbish	No	Rehab	2006-2009
P2-89	Rehabilitation of Solids Storage Silos C & D	Yes	Rehab	2007-2010

Table 2-1
Proposed Improvements Required for Secondary Treatment at Plant Nos. 1 and 2 (cont.)

Project	Title	Addressed in PEIR for Scenario 4? (yes/no)	Rehabilitation of Existing Structure or Construction of New Structure	Construction Schedule
Plant No. 2				
P2-90	Trickling Filters	Yes - partially[3]	New	2007-2011
P2-91	Digester Rehabilitation at Plant No. 2	Yes – partially[1]	Rehab	2007-2012
P2-92	Sludge Dewatering and Odor Control at Plant No. 2	Yes – partially[2]	Rehab	2008-2011
P2-93	Truck Wash and Relocation of Dewatering Beds at Plant No. 2	No	New	2006-2007

Source: Orange County Sanitation District, 2003.

[1] Capacity requirements and additional digesters were identified in the PEIR.
[2] The PEIR identified additional solids handling and dewatering facilities but did not describe replacement of dewatering equipment with alternate technology as currently proposed.
[3] The PEIR identified aeration basins at Plant No. 2 rather than trickling filters for secondary treatment.

In response to District comment, text on page 2-9 has been revised:

P1-82 Activated Sludge Rehabilitation. The proposed improvements were not described in the PEIR. Project P1-82 would rehabilitate the activated sludge facility and construct new clarifiers to improve the reliability and operational efficiency of the existing 80-mgd secondary treatment at Plant No. 1. The project would not increase treatment capacity. The project would rehabilitate or replace aging equipment including aeration basin splitter boxes, feed gates, pipes, valves, and electrical and control equipment. The project would also include construction of two new clarifiers (15,000 sf total) that would serve as storage basins while the secondary clarifiers undergo service. Equipment to allow nitrification/denitrification would be added to the treatment process to increase ammonia removal. In addition, the project could include the construction of a return activated sludge (RAS) pump station. For expansion of the secondary clarifiers, demolition of a pipeline and one concrete connecting wall of the existing clarifiers would be required. Overall, construction would last approximately 15 months, beginning in September 2005 and ending in December 2006.

In response to District comment, Table 2-5 has been revised:

Table 2-5
Proposed Area and Height of New and Expanded Facilities

Project	New Structure/Facility	Area (sf)	Height (ft)
Plant No. 1			
P1-82 Rehabilitation of the Activated Sludge Plant	Secondary Clarifiers	15,000	1
P1-97 Plant No. 1 66 KV Substation	66KV Substation	15,000	20
P1-100 Sludge Digester Rehab.	Expansion of Power Building	1,500	20
P1-101 Sludge Dewatering and Odor Control	New Dewatering Building	20,000	40
	Expansion of Solids Storage Facility	500	25
P1-102 Secondary Activated Sludge Facility	Aeration Basins	117,100	12
	Clarifiers	18,900	5
	Primary Effluent Pump Station	2,600	20
	Blower Building	11,500	30
	Thickening Building	6,100	22
	Electrical Building	2,000	22
P1-106 Truck Wash and Dewatering Beds	Drying Beds (relocation)	15,400	5
	Truck Wash	2,800	On grade
Plant No. 2			
P2-74 Rehabilitation of the Activated Sludge Plant	No new structures	NA	NA
P2-80 Primary Treatment Rehab/Refurbish	No new structures	NA	NA
P2-89 Rehabilitation of Solids Storage Silos C & D	No new structures	NA	NA
P2-90 New Trickling Filters	Trickling Filters	200,000	53
	Trickling Filter Clarifiers	180,000	15
	Solids Contact Tanks	30,000	20
	TF Pump Station	4,800	25
	Odor Control System	10,000	50
	Electrical Building	17,600	25
P2-91 Digester Rehabilitation	2 Storage (Sludge Holding) Tanks	200	20
	Electrical Building	500	15
	Pump Station	1,500	15
P2-92 Sludge Dewatering and Odor Control	No new structures	NA	NA
P2-93 Relocation of Dewatering Beds	Drying Beds (relocation)	18,200	5
	Truck Wash	2,800	On grade

Source: Orange County Sanitation District.

CHAPTER 3 ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION

In response to Comment F-1 from SCAQMD, Table 3.2-7 on page 3.2-11 has been revised to revise the column heading ~~**Plant No. 1**~~ to **Cumulative Emissions**

In response to District Comment, text on page 3.7-6 has been revised:

Operational activities associated with the proposed Project that could generate noise include pump noise and truck traffic associated with chemical delivery and grit and sludge removal. ~~The proposed Project would rehabilitate and/or replace the existing treatment plant structures. As such, the proposed Project would not add any new sources of noise.~~ The PEIR identified potential operational noise impacts and established a fence-line noise standard for operational noise of 55 dBA between 7:00 AM and 10:00 PM and 50 dBA between 10:00 PM and 7:00 AM.

In response to Comment C-11 from Huntington Beach, text on page 3.8-1 (third paragraph, second sentence) has been revised:

Brookhurst Street carries an ADT of approximately 41,000 ~~of between 12,000 and 25,000~~ from PCH to Garfield Avenue in the City of Huntington Beach.

In response to District Comment, text on page 3.8-8 has been revised:

The number of haul truck trips per day estimated in Table 3.8-3 are daily averages spread over a year. Actual peak-day trips could be higher. During these peak off-site hauling operations, traffic generated by the construction could exceed five percent of the total daily traffic on Brookhurst Street and Ellis Avenue.

In response to Comment C-4 from Huntington Beach, revise mitigation measure M-6.2-1 on Page 3.8-9:

M-6.2-1 *For each major project or construction period, the District shall complete a detailed schedule construction and haul route plan and notify Caltrans and the Cities of Fountain Valley and Huntington Beach of construction. The District shall submit the schedule and haul route plan to the said Jurisdictions for review and comment. Construction vehicles shall be run on a schedule to minimize truck traffic on arterial highways during peak periods, and to reduce their impediment on street construction.*

CHAPTER 7, ACRONYMS AND ABBREVIATIONS

In response to District comment, the following acronyms are added on pages 7-3 and 7-4:

OSSWMP Onsite Stormwater Management Plan

POV Personal Occupancy Vehicle

ORANGE COUNTY SANITATION DISTRICT

MITIGATION MONITORING AND REPORTING PROGRAM FOR THE SECONDARY TREATMENT AND IMPROVEMENT PROJECT

AESTHETICS

Impact 3.1-1: Although several of the new structures would be visible from adjacent residential neighborhoods, the Project would not substantially alter or degrade the existing visual character of the site and surroundings.

> **Measure (M-3.1-1)** The contractor shall replace damaged landscaping and restore the construction area near each plant's property boundary to a condition similar to existing conditions.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Include in the construction contract specifications.	Monitor compliance with construction contract specifications. Record pre and post-construction conditions for administrative record.	OCSD	Prior to and during construction activities.

AIR QUALITY

Impact 3.2-1: Construction of the project would emit criteria pollutants. Some estimated daily average construction-phase emissions would exceed significance thresholds set by the SCAQMD.

> **Measure (3.2-1a**) Soil binders shall be used on site in appropriate areas (generally non-traffic areas such as disturbed areas awaiting next phase of construction activity) where they can effectively reduce dust generation.

Measure (6.5-1a) General contractors shall maintain equipment engines in proper tune and operate construction equipment so as to minimize exhaust emissions. Such equipment shall not be operated during second stage smog alerts.

Measure (6.5-1b) During construction, trucks and vehicles in loading or unloading queues shall be kept with their engines off, when not in use, to reduce vehicle emissions. Construction activities shall be phased and scheduled to avoid emissions peaks, and discontinued during second-stage smog alerts.

Measure (6.5-1c) General contractors shall use reasonable and typical watering techniques to reduce fugitive dust emissions. All unpaved demolition and construction areas shall be wetted at least twice a day during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403.

Measure (6.5-1e) Ground cover shall be re-established on the construction site through seeding and watering.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Include air emissions restrictions and standard operating procedures for construction work in the contract specifications.	Maintain record of construction oversight for administrative record.	OCSD	Prior to and during construction.
2. Include dust reduction measures listed in mitigation measures in cotract specifications.			
3. Conduct oversight of construction activities to ensure scope of work is carried out.			

Impact 3.2-2: Operation of the proposed project would emit criteria pollutants. Estimated daily average emissions would exceed significance thresholds set by the SCAQMD.

Measure (6.5-3a) The District will maintain its ride-share programs to reduce commuter traffic and air quality impacts.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Maintain current ride-share program for OCSD employees.	Monitor participation and effectiveness of program.	OCSD	On-going throughout construction and operations.

Impact 3.2-3: Neither construction or operation of the proposed Project would result in objectionable odors affecting a substantial number of people.

Measure (3.2-2) The District shall ensure that contractors remove salvaged/demolished equipment from the treatment plants to minimize potential odors during the removal of existing facilities. Staging areas shall not be used to store salvaged/demolished equipment.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Include in contract specifications.	Monitor compliance with construction contract specifications.	OCSD	During construction.

GEOLOGY AND SOILS

Impact 3.3-1: The proposed Project could expose people or structures to potential adverse effects due to geologic and seismic hazards.

Measure (6.6-1a) Geotechnical Evaluations. During the project design phase for all facilities, the District will perform design-level geotechnical evaluations. The geotechnical evaluations will include subsurface exploration and review of seismic design criteria to ensure that design of the facilities meet seismic safety requirements of the UBC.

Site-specific testing for soils susceptible to liquefaction shall be conducted. If testing results indicates that conditions are present that could result in significant liquefaction and damage to project facilities, appropriate feasible measures will be developed and incorporated into the project design. The performance standard to be used in the geotechnical evaluations for mitigating liquefaction hazards will be minimization of the hazards. Measures to minimize significant liquefaction hazards could include the following:

- Densification or dewatering of surface or subsurface soils.
- Construction of pile or pier foundations to support pipelines and/or buildings.

- Removal of material that could undergo liquefaction in the event of an earthquake and replacement with stable material.

Recommendations of the geotechnical report will be incorporated into the design and construction of proposed facilities.

Measure (6.6-1b) Seismic Safety. The District will design and construct new facilities in accordance with District seismic standards and/or meet or exceed seismic, design standards in the most recent edition of the CBC.

Measure (6.6-2a) Spill Prevention. The District will implement the Spill Prevention Containment and Countermeasures Plan (SPCC).

Measure (6.6-2b) Spill Containment. OCSD chemical facilities will be designed with secondary containment, such as berms, to contain and divert toxic chemicals from wastewater flows and isolate damaged facilities to reduce contamination risks.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Complete design-level geotechnical evaluations prior to construction.	Maintain file of completed geotechnical evaluations.	OCSD	Prior to construction activities.
2. Require compliance with California Building Code in contract specifications.	Maintain record of specifications and as-builts for administrative record	OCSD	Prior to construction activities.
3. Implement and update SPCC plan.	Maintain record of SPCC plan for administrative record.	OCSD	As needed.

Impact 3.3-2: Dewatering could create unstable soil conditions, creating potential risk of property damage to proposed and nearby existing structures.

Measure (3.3-2) The District or its consultant shall conduct a geotechnical investigation during the design phase of each facility project to develop measures to address poor soil conditions and dewatering requirements to be implemented during project design and construction that will protect people and structures. District shall include the measures in its project design and construction specifications and shall oversee contractor implementation.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Complete geotechnical investigation prior to construction. Assure that contractors implement all recommendations of geotechnical investigations.	Monitor compliance with construction contract specifications. Maintain record of geotechnical investigations, construction specifications, as-builts and construction oversight for administrative record.	OCSD	Complete geotechnical investigation prior to approving final design. Monitor compliance during construction. Prior to construction.

HAZARDS AND HAZARDOUS MATERIALS

Impact 3.4-2: Abandoned oil wells could be encountered during excavation at Plant No. 2 and represent both a safety hazards for workers as well as a potential conduit for surface contamination to reach groundwater if wells are not properly abandoned.

Measure (7.8-3e) Identify Abandoned Oil Wells. Prior to construction, the District shall identify existing and abandoned oil production wells within the project area using the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR), District 1 well location maps. Access to identified non-abandoned oil wells will be maintained. Previously abandoned wells identified beneath proposed structures or utility corridors may need to be plugged to current DOGGR specifications including adequate gas venting systems.

Measure (7.8-3f) Abandon Wells. Should construction activities uncover previously unidentified oil production wells, the DOGGR will be notified, and the well will be abandoned following DOGGR specifications for well abandonment.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Locate wells and consult with DOGGR during design.	Record pre and post-construction conditions for administrative record.	OCSD	During design.
2. Include in construction contract specifications.	Monitor compliance with approved construction contract specifications.	OCSD	Prior to and during installation.

Impact 3.4-3: Soils contaminated from previous activities in the area could be encountered during excavation activities and create a significant hazard to the public or environment if not properly contained and disposed of.

Measure (M-3.4-1) Any contaminated soils encountered on the projectsite during site clearance or excavation shall be removed from the project site and disposed of off-site in accordance with applicable hazardous waste regulations. The District will notify the Orange County Health Care Agency of remedial actions

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Removal of contaminated soils.	Contract with qualified firms for the removal and transportation of soils to permitted facilities Maintain administrative records of all remedial actions	OCSD	Throughout site clearance and excavation phase of construction.

HYDROLOGY AND WATER QUALITY

Impact 3.5-1: The construction of the proposed Project could result in erosion and receiving water quality impacts.

Measure (6.7-1a) Best Management Practices. The District will implement BMPs as outlined in the District's Onsite Stormwater Management Plan (OSSWMP).

Measure (6.7-1b) Storm Water Management. The District will train construction and operation employees in stormwater pollution prevention practices. Individual contractors performing construction at each treatment facility shall be required to comply with provisions of the District's OSSWMP.

Measure (6.7-1c) Stormwater Facility Maintenance. The District will inspect and maintain all on-site stormwater drains and catch basins on plant property regularly.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Implement BMPs. 2. Implement OSSWMP. 3. Periodically update OSSWMP. 4. Periodically inspect construction sites.	Maintain compliance with OSSWMP for administrative record. Maintain record of site inspections.	OCSD	As needed.

Measure (6.7-2a) Groundwater Dewatering. Construction contractors will comply with the District's Dewatering Specifications.

Measure (6.7-2b) Groundwater Dewatering Disposal. Water from dewatering will be disposed of in a suitable manner in conformance with the District's OSSWMP as approved by the RWQCB.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Update dewatering procedures periodically. 2. Periodically inspect construction sites.	Maintain record of dewatering procedures for administrative record. Maintain record of site inspections.	OCSD	During design and construction.

NOISE

Impact 3.7-1: Operation of the proposed Project treatment facilities would generate noise but with mitigation noise levels would not exceed established standards or result in a substantial permanent increase above ambient conditions.

Measure (6.4-2a) Noise Performance Standard. OCSD shall establish a performance noise standard for operational noise at Reclamation Plant No. 1 and Treatment Plant No. 2. The performance standard shall apply to the property line of each plant and shall prohibit hourly average noise levels in excess of 55 dBA between the hours of 7:00 a.m. to 10:00 p.m. and 50 dBA between the hours of 10:00 p.m. and 7:00 a.m., as required by the Fountain Valley and Huntington Beach Noise Ordinances. Available mitigation to achieve the performance standard consists of locating noise sources away from sensitive receptors, installation of acoustical enclosures around noise sources, installation of critical application silencers and sequential mufflers for exhaust noise, installation of louvered vents, directing vent systems away from nearby residences, and constructing soundwalls at the property lines.

Measure (3.7-1) All buildings will be designed to insulate noise of the machinery such that fence-line noise standards would not be exceeded.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Design new facilities to conform to noise performance standard and include noise performance standard in construction contract specifications.	Maintain record of specifications, construction oversight and as-builts for administrative record.	OCSD	Prior to and during construction.

Impact 3.7-2: The proposed Project would generate noise during construction that could result in substantial temporary increases in ambient noise levels in the project vicinity.

Measure (6.4-1a) Construction Hours. The District's standard specifications provide construction hours of work between 7:00 AM and 5:30 PM, except for emergency or special circumstances requiring that work be done during low-flow periods.

Measure (6.4-1b) Muffled Equipment. All equipment used during construction shall be muffled and maintained in good operating condition. All internal combustion engine driven equipment shall be fitted with intake and exhaust mufflers that are in good condition.

Measure (6.4-1c) Pile-Driving Noise Reduction. OCSD shall consult with an acoustical engineer to evaluate other alternatives for mitigating impacts from extensive pile driving activities when necessary.

Measure (6.4-1d) Alternatives for Foundations. OCSD will evaluate the use of alternative foundation designs to avoid a need for pilings where cost-effective and technically feasible.

Measure (6.4-1e) Construction Notification. Nearby sensitive receptors affected by construction shall be notified concerning the project timing and construction schedule, and shall be provided with a phone number to call with questions or complaints.

Measure (6.4-1f) Pile Driving Noise Reduction. Noise-reduction measures will be implemented such as acoustic insulation or by other means during the construction period at Plant No. 1 to reduce a nuisance condition to the closest residences when pile driving is taking place.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Include compliance with local noise and construction ordinances in standard operational procedures	Maintain record of noise complaints for administrative record.	OCSD	On-going
2. Implement noise reduction procedures when possible.			
3. Consider operational noise when locating new equipment.			

TRAFFIC

Impact 3.8-1: Periods of peak construction of the proposed Project would add to traffic along local access streets (including freeway access) causing temporary but substantial increases in traffic over existing conditions.

Measure (6.2-1) Contractor Coordination. For each major project or construction period, the District shall complete a detailed construction schedule and haul route plan and notify Caltrans and the Cities of Fountain Valley and Huntington Beach of construction. The District shall submit the schedule and haul route plan to the said Jurisdictions for review and comment. Construction vehicles shall be run on a schedule to minimize truck traffic on arterial highways during peak periods, and to reduce their impediment on street construction.

IMPLEMENTATION PROCEDURE	MONITORING AND REPORTING ACTIONS	MONITORING RESPONSIBILITY	MONITORING SCHEDULE
1. Require traffic control plan for construction projects.	Ensure that construction vehicle traffic complies with traffic control plan.	OCSD	Prior to and during construction.
2. Notify affected cities and agencies of construction schedule for review and comment.	Provide record of construction oversight.		
3. Provide construction oversight.			