



COUNTY SANITATION DISTRICTS  
OF LOS ANGELES COUNTY

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JAMES F. STAHL  
Chief Engineer and General Manager

December 13, 2001

File No: 31-900.13.10J

Ms. Kathy C. Stevens  
Planning/CEQA  
South Coast Air Quality Management District  
21865 East Copley Drive  
Diamond Bar, CA 91765-4182

Dear Ms. Stevens:

**Proposed Los Angeles Department of Water and Power's Installation of a  
Combined Cycle Generating Facility at the Valley Generating Station Project**

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on November 29, 2001. We offer the following comments:

- 1-1 [ ] • The Districts do not maintain any facilities within the project area.
- 1-2 [ ] • Reference to the Districts, "(Los Angeles County Sanitation Districts, 2001)", on page 4-58 in the second paragraph under 4.5.2.1 Process Wastewater Discharges, should be deleted. The Districts do not have any information regarding available capacity in the City of Los Angeles' local sewer system. You may contact the City's Department of Public Works for that information.

If you have any questions, please contact the undersigned at (562) 699-7411, extension 2717.

Very truly yours,

James F. Stahl

Ruth I. Frazen  
Engineering Technician  
Planning & Property Management Section

RIF:eg

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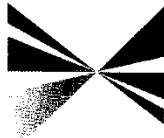
**COMMENT LETTER 1: COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY**

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**Response 1-1:** Thank you for the comment regarding Sanitation Districts of Los Angeles County facilities within the project area.

**Response 1-2:** The reference to the “Districts” has been deleted in the Final EIR.

SOUTHERN CALIFORNIA



**ASSOCIATION of  
GOVERNMENTS**

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**Riverside County Transportation Commission:** Robert Fowle, Hemet

**Ventura County Transportation Commission:** Bill Fowle, Simi Valley

December 14, 2001

Ms. Kathy C. Stevens  
CEQA Section  
Planning, Rules and Area Sources  
South Coast Air Quality Management District  
21865 E. Copley Drive  
Diamond Bar, CA 91765-4182

**RE: Comments on the Draft Environmental Impact Report for the LADWP Valley Generating Station - SCAG No. I 20010650**

Dear Ms. Stevens:

Thank you for submitting the **Draft Environmental Impact Report for the LADWP Valley Generating Station** to SCAG 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. If you have any questions regarding the attached comments, please contact me at (213) 236-1867. Thank you.

Sincerely,

**JEFFREY M. SMITH, AICP**  
Senior Planner  
Intergovernmental Review

**COMMENTS ON THE  
DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR THE  
LADWP VALLEY GENERATING STATION  
SCAG NO. 1 20010650**

**PROJECT DESCRIPTION**

The proposed Project considers the installation of a new combined cycle generating facility (CCGF) at an existing generating facility, which will replace four existing utility boilers. The new CCGF will also include two combustion gas turbines, a new steam turbine generator, two heat recovery steam generators and associated selective catalytic reduction air pollution equipment, cooling towers and ancillary equipment.

**INTRODUCTION TO SCAG REVIEW PROCESS**

2-1

The document that provides the primary reference for SCAG's project review activity is the Regional Comprehensive Plan and Guide (RCPG). The RCPG chapters fall into three categories: core, ancillary, and bridge. The Growth Management (adopted June 1994), Regional Transportation Plan (adopted April 2001), Air Quality (adopted October 1995), Hazardous Waste Management (adopted November 1994), and Water Quality (adopted January 1995) chapters constitute the core chapters. These core chapters respond directly to federal and state planning requirements. The core chapters constitute the base on which local governments ensure consistency of their plans with applicable regional plans under CEQA. The Air Quality and Growth Management chapters contain both core and ancillary policies, which are differentiated in the comment portion of this letter. The Regional Transportation Plan (RTP) constitutes the region's Transportation Plan. The RTP policies are incorporated into the RCPG.

Ancillary chapters are those on the Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Energy, and Integrated Solid Waste Management. These chapters address important issues facing the region and may reflect other regional plans. Ancillary chapters, however, do not contain actions or policies required of local government. Hence, they are entirely advisory and establish no new mandates or policies for the region.

Bridge chapters include the Strategy and Implementation chapters, functioning as links between the Core and Ancillary chapters of the RCPG. Each of the applicable policies related to the proposed project are identified by number and reproduced below in italics followed by SCAG staff comments regarding the consistency of the Project with those

2-1  
cont policies.

#### **SUMMARY OF SCAG STAFF COMMENTS**

- 2-2 1. The Draft EIR provides a discussion of the relationship of the proposed Project to **applicable regional plans** as required by Section 15125 [d] of Guidelines for Implementation of the California Environmental Quality Act.
- 2-3 2. The Draft EIR, in Appendix B, includes a discussion on SCAG's response on the NOP for the proposed Project. However, the Draft EIR did not provide a consistency discussion on the policies as recommended.
- 2-4 3. The Final EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide, utilizing commentary from the following detailed SCAG staff comments. The response should also discuss any inconsistencies between the proposed project and applicable regional plans. We suggest that you identify the specific policies, by policy number, with a discussion of consistency or support with each policy.

#### **CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES**

**The Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide contains a number of policies that are particularly applicable to the LADWP Valley Generating Station.

##### *Core Growth Management Policies*

- 2-5 3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*
- SCAG staff comments: The Draft EIR, on page 2-12, provides a discussion on project construction activities. The proposed Project will be developed beginning in the Spring of 2002 through the Summer of 2003. Improvements and services will be implemented concurrently with the construction of the proposed Project. The Project is consistent with this core RCPG policy
- 2-6 **The 2001 Regional Transportation Plan (RTP)** also has goals, objectives, policies and actions pertinent to this proposed project. This RTP links the goal of sustaining mobility

with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the policies of the RTP are the following:

Core Regional Transportation Plan Policies

- 2-6  
cont.
- 4.02 *Transportation investments shall mitigate environmental impacts to an acceptable level.*
  - 4.04 *Transportation Control Measures shall be a priority.*
  - 4.16 *Maintaining and operating the existing transportation system will be a priority over expanding capacity*

SCAG staff comments. The Draft EIR did not address the above policies. However in Appendix B, the response suggests consistency with the above policies. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of the above policies. Based on the information in the Draft EIR, we are unable to determine whether the Project is consistent with the above core policies.

**GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE REGIONAL STANDARD OF LIVING**

2-7

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers

- 3.10 *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

SCAG staff comments. The Draft EIR addresses subjects that may have environmental impacts. It is written in a manner, where all possible impacts are mitigated this will help minimize red tape, and help maintain the economic vitality and competitiveness. A discussion on discretionary actions and approvals required to implement the proposed Project are on page 2-8 of the Draft EIR.

2-7  
cont

These actions will also help to maintain economic vitality and competitiveness. In addition, the Draft EIR on page 2-1 includes project objectives, which will also help to minimize red tape, and help maintain the economic vitality and competitiveness. The Project is supportive of this ancillary RCPG policy.

**GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE**

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

2-8

*3.18 Encourage planned development in locations least likely to cause adverse environmental impact.*

SCAG staff comments. Section 4 (Potential Environmental Impacts and Mitigation Measures) of the Draft EIR includes Table 4.73, Summary of Mitigation Measures which summarizes the types of measures to mitigate the impacts outlined in the Draft EIR. The Project is proposed in a manner that will minimize the environmental impacts. The Project is supportive of this ancillary RCPG policy.

2-9

*3.22 Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*

SCAG staff comments. The Draft EIR in Section 4.3 (Geology and Soils) identifies potential construction and operational impacts related to expansive soil, erosion, soil contamination, ground rupture, ground shaking, liquefaction and slope stability. Mitigation measures are recommended to address identified slope stability impacts through the implementation of specific requirements and/or project design. The Project is supportive of this ancillary RCPG policy.

2-10

*3.23 Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans*

SCAG staff comments. See SCAG staff comments on policies 3.18 and 3.22.

2-10  
cont.

The Draft PEIR, in Section 4.6 (Noise) identifies potential impacts related to construction and operations. No mitigation measures are recommended. However, LADWP will adhere to a set of guidelines for minimizing construction noise impacts. The Project is supportive of this ancillary RCPG policy.

#### **AIR QUALITY CHAPTER CORE ACTIONS**

The **Air Quality Chapter (AQC)** core actions that are generally applicable to the Project are as follows:

2-11

*5.11 Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

**SCAG staff comments.** The Draft EIR, in Section 4.2 (Air Quality), discusses regional, local and Project air quality relationships and regulatory requirements. Mitigation measures are recommended to address emission impacts related to construction and operations. Despite the mitigation measures, the proposed Project will have a significant impact on regional air quality. The Project is partially consistent with this core RCPG policy.

#### **WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS**

The Water Quality Chapter core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters.

2-12

*11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*

**SCAG staff comments.** The Draft EIR does not address the subject of reclaimed water available for the proposed Project. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of the above policy. Based on the information in the Draft EIR, we are unable to determine whether the Project is consistent with this core RCPG policy.



**CONCLUSIONS AND RECOMMENDATIONS:**

- 2-13
1. As noted in the staff comments, the Draft Environmental Impact Report for the LADWP Valley Generating Project is consistent with or supports some of the core and ancillary policies in the Regional Comprehensive Plan and Guide.  
Based on the information in the Draft EIR, we are unable to determine whether the Project is consistent with core policies 4.02, 4.04, and 4.16 and 11.07. Based on the information in the Draft EIR, the proposed Project is partially consistent with core policy 5.11.
- 2-14
2. As noted in the General Staff Comments, the Final Environmental Impact Report should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide and discuss any inconsistencies between the proposed project and applicable regional plans.
- 2-15
3. All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

## SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

### *Roles and Authorities*

THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG) is a *Joint Powers Agency* established under California Government Code Section 6502 ET seq. Under federal and state law, SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). SCAG's mandated roles and responsibilities include the following:

SCAG is designated by the federal government as the Region's *Metropolitan Planning Organization* and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. '134, 49 U.S.C. '5301 et seq., 23 C.F.R. '450, and 49 C.F.R. '613. SCAG is also the designated *Regional Transportation Planning Agency*, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082 respectively.

SCAG is responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the *South Coast Air Quality Management Plan*, pursuant to California Health and Safety Code Section 40460(b)-(c). SCAG is also designated under 42 U.S.C. '7504(a) as a *Co-Lead Agency* for air quality planning for the Central Coast and Southeast Desert Air Basin District.

SCAG is responsible under the Federal Clean Air Act for determining *Conformity* of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. '7506.

Pursuant to California Government Code Section 65089.2, SCAG is responsible for *reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans* required by Section 65080 of the Government Code. SCAG must also evaluate the consistency and compatibility of such programs within the region.

SCAG is the authorized regional agency for *Inter-Governmental Review* of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

SCAG reviews, pursuant to Public Resources Code Sections 21083 and 21087, Environmental Impacts Reports of projects of regional significance for consistency with regional plans [California Environmental Quality Act Guidelines Sections 15206 and 15125(b)].

Pursuant to 33 U.S.C. '1288(a)(2) (Section 208 of the Federal Water Pollution Control Act), SCAG is the authorized *Areawide Waste Treatment Management Planning Agency*.

SCAG is responsible for preparation of the *Regional Housing Needs Assessment*, pursuant to California Government Code Section 65584(a).

SCAG is responsible (with the Association of Bay Area Governments, the Sacramento Area Council of Governments, and the Association of Monterey Bay Area Governments) for preparing the *Southern California Hazardous Waste Management Plan* pursuant to California Health and Safety Code Section 25135.3.

## **COMMENT LETTER 2: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS**

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**Response 2-1:** Thank you for your comment regarding SCAG's review process. The SCAQMD is aware of the fact that the Regional Comprehensive Plan and Guide (RCPG) is the primary reference for SCAG's review authority. As noted in the Draft EIR (Appendix B, response to comment letter #3.), and in the following responses, the proposed LADWP VGS project is not inconsistent with any part of the RCPG. Therefore, no further discussion is warranted or required in the Final EIR.

**Response 2-2:** As stated in the comment, consistent with CEQA Guidelines §15125(d), the Draft EIR provides a discussion of the relationship of the proposed project to applicable regional plans.

**Response 2-3:** In Appendix B of the Draft EIR, the SCAQMD provided specific responses to each comment in SCAG's May 21, 2001 comment letter regarding consistency with RCPG policies. As noted in the responses in Appendix B, no components of the proposed project were identified as being inconsistent with the RCPG. CEQA Guidelines §15125(d) specifically states, "The EIR shall discuss any inconsistencies between the proposed project and applicable general plans and regional plans." Since, as noted in the responses to SCAG's May 21, 2001 comment letter in Appendix B, the proposed project was not found to be inconsistent with the RCPG, no further discussion was warranted or required in the Draft EIR.

**Response 2-4:** The commentator is referred to the response to comment 2-3. Additional comments on consistency have been submitted by SCAG. Specific responses to these comments have been provided in responses 2-5 through 2-15.

**Response 2-5:** The SCAQMD concurs with the commentator that the proposed project is consistent with core RCPG Growth Management Policy 3.03.

**Response 2-6:** The proposed project does not include any significant transportation investments or control measures. Therefore, RCPG policies 4.02, 4.04 and 4.16, related to transportation investments and implementation of Transportation Control Measures do not apply to the proposed project. It should also be noted that no new employees and associated trips would be required during operation of the project, so the proposed project is not inconsistent with RCPG policy 4.16. No further discussion is warranted or required.

**Response 2-7:** The SCAQMD concurs with the commentator's assertion that the proposed project is not inconsistent with the RCPG. No further discussion is warranted or required.

## **COMMENT LETTER 2: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (Continued)**

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**Response 2-8:** The SCAQMD concurs with the commentator's assertion that the proposed project is not inconsistent with RCPG ancillary policy 3.18. No further discussion is warranted or required.

**Response 2-9:** The SCAQMD concurs with the commentator's assertion that the proposed project is not inconsistent with RCPG ancillary policy 3.2.2. No further discussion is warranted or required.

**Response 2-10:** The SCAQMD concurs with the commentator's assertion that the proposed project is not inconsistent with RCPG ancillary policy 3.2.3. No further discussion is warranted or required.

**Response 2-11:** The SCAQMD disagrees with the commentator's assertion that "The project is partially consistent with this [5.11] core RCPG policy." As noted in this comment, "The Draft EIR, in Section 4.2 (Air Quality), discusses regional, local and project air quality relationships and requirements." Although the proposed project has the potential to generate significant short-term construction air quality impacts, mitigation measures are required. Therefore, the project is not only consistent with core policy 5.11 to consider air quality, etc.; it is also consistent with the portion of core policy 5.11 to "minimize conflicts" by requiring mitigation measures.

The proposed project is specifically being undertaken to provide overall air quality benefits. Provided below is a summary of the conclusions relating to air quality impacts from the proposed project.

Although unmitigated direct project operational emissions of CO, VOC, SO<sub>x</sub> and PM<sub>10</sub> exceed mass emission significance criteria, as shown in Table 4.2-20, mitigated VOC and SO<sub>x</sub> emissions are anticipated to be below mass emission significance criteria, as shown in Table 4.2-29. Therefore, only CO and PM<sub>10</sub> emissions are anticipated to exceed the mass emissions significant criteria.

As shown in the localized air quality modeling results in Tables 4.2-22 and 4.2-23, incremental PM<sub>10</sub> and CO emissions are not anticipated to cause increases in ambient concentrations that exceed significance criteria, and incremental NO<sub>x</sub> and SO<sub>x</sub> emissions are not anticipated to cause localized violations of any ambient air quality standards.

## **COMMENT LETTER 2: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (Continued)**

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Significant adverse impacts to regional air quality might result from significant increases to precursors to regional ozone or PM10 concentrations. These precursors include VOC, NO<sub>x</sub>, and SO<sub>x</sub>. However, as stated previously, mitigated VOC and SO<sub>x</sub> emissions are below mass emission significance criteria, and unmitigated NO<sub>x</sub> emissions are also below the mass emission significance criterion, as shown in Table 4.2-21. Therefore, incremental direct project operational emissions are not anticipated to cause significant adverse impacts to regional air quality.

The results of the health risk assessment of effects on human health from direct project operational emissions, presented in Section 4.2.3.3, indicated that adverse health risks are anticipated to be below significance criteria.

**Response 2-12:** The analysis of potential water quality impacts from the proposed project concluded that, “No significant adverse impacts to water quality are expected as a result of proposed project activities at the VGS.” Further, “No changes to water quality are expected.” Since the proposed project is not expected to create significant adverse water quality impacts, the proposed project is not inconsistent with RCPG water quality objectives to “maintain the chemical, physical, and biological integrity of the nation’s water...”. Finally, since the proposed project is not expected to generate significant adverse water quality impacts, no mitigation, such as using reclaimed water, is required. Therefore, RCPG ancillary policy 11.07 is not relevant to the proposed project.

**Response 2-13:** As discussed in Response 2-6, the proposed project does not include any significant transportation investments. Therefore, RCPG policies 4.02, 4.04 and 4.16, related to transportation investments, implementation of Transportation Control Measures, and maintaining and operating the existing transportation system, do not apply to the proposed project.

The SCAQMD disagrees with the commentator’s assertion that the Draft EIR is partially consistent with core policy 5.11. Please refer to response to comment 2-11.

As indicated in response to comment 2-12, the Draft EIR is not inconsistent with water quality recommendations and policies. Further, since no significant adverse water quality impacts were identified for the proposed project, core policy 11.07 is not relevant.

**Response 2-14:** As noted in the Draft EIR (Appendix B, responses to comment letter 3.) and in the responses to comments 2-1 through 2-13, no inconsistencies with any regional plans, including the RCPG, were identified for the proposed project. Therefore, no additional discussion is warranted or required in the Final EIR.

**COMMENT LETTER 2: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (Continued)**

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**Response 2-15:** CEQA Guidelines §15126.4(1)(1) requires an EIR to “describe feasible measures which could minimize significant adverse impacts...” The Draft EIR complies with this and all other relevant CEQA requirements. Further, consistent with CEQA Guidelines §15097, a Mitigation Monitoring Plan will be prepared prior to certification of the EIR. Implementation of this plan will ensure that the mitigation measures required for the proposed project are implemented and monitored.



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Department of Toxic Substances Control

Edwin F. Lowry, Director  
1001 "I" Street, 25<sup>th</sup> Floor  
P.O. Box 806  
Sacramento, California 95812-0806



Gray Davis  
Governor

December 6, 2001

Kathy C. Stevens  
South Coast Air Quality Management District  
21865 E. Copley Drive  
Diamond Bar, California 91765

Re: Los Angeles Department of Water and Power's Installation of a Combined  
Cycle Generating Facility at the Valley Generating Station Project

3-1

The Department of Toxic Substances Control (DTSC) is in receipt of the environmental document identified above. Based on a preliminary review of this document, we have determined that additional review by our regional office will be required to fully assess any potential hazardous waste related impacts from the proposed project. The regional office and contact person listed below will be responsible for the review of this document in DTSC's role as a Responsible Agency under the California Environmental Quality Act (CEQA) and for providing any necessary comments to your office:

Sayareh Amirebrahimi  
Site Mitigation Branch  
1011 North Grandview Avenue  
Glendale, California 91201

If you have any questions concerning DTSC's involvement in the review of this environmental document, please contact the regional office contact person identified above.

Sincerely,

Guenther W. Moskat, Chief  
Planning and Environmental Analysis Section

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*

### **COMMENT LETTER 3: DEPARTMENT OF TOXIC SUBSTANCES CONTROL, SACRAMENTO**

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**Response 3-1:** Pursuant to California Public Resources Code §21069 “Responsible Agency” means a public agency, other than the lead agency that has responsibility for carrying out or approving a project. The Department of Toxic Substances Control has not been identified as a responsible agency as defined by the CEQA statutes.

The DTSC was however, provided a courtesy copy of the Draft EIR, to review and provide substantive comments. The correspondence dated December 6, 2001 does not contain any substantive comments, and therefore requires no response. Further, pursuant to CEQA Guidelines §15088(a), a lead agency may respond to late comments (comments received after the close of public review period), but is not required to respond to late comments. The public review period for the proposed project ended January 2, 2002.





Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

## Department of Toxic Substances Control

Edwin F. Lowry, Director  
1011 N. Grandview Avenue  
Glendale, California 91201



Gray Davis  
Governor

December 26, 2001

Ms. Kathy C. Stevens  
South Coast Air Quality Management District  
21865 E. Copley Drive  
Diamond Bar, California 91765

NOTICE OF COMPLETION OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
LOS ANGELES DEPARTMENT OF WATER AND POWER'S INSTALLATION OF A  
COMBINED CYCLE GENERATING FACILITY AT THE VALLEY GENERATING  
STATION, SCH NO. 2001051035

Dear Ms. Stevens:

The Department of Toxic Substances Control (DTSC) has received your Notice of Completion of a draft of Environmental Impact Report (EIR) for the project mentioned above.

Based on the review of the document, DTSC comments are as follows:

4-1

Section 4.3.1.3 of the EIR states that although soil sampling conducted by LADWP for specific areas within the project site indicates that contaminated soils are not present, it is still possible that some contaminated soils will be disturbed during certain construction related activities (e.g., excavation, and grading). If during construction of the project, soil contamination is suspected, construction in the area should stop, and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exists, the EIR should identify how any required investigation and/or remediation will be conducted, and which government agency will provide regulatory oversight.

4-2

DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). Also, DTSC is administering the Urban Cleanup Loan Program (UCLP), which provides low-interest loans to investigate and cleanup hazardous materials at properties where

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*

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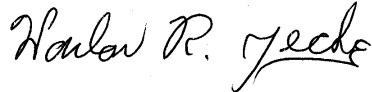
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December 26, 2001  
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4-2  
cont.

redevelopment is likely to have a beneficial impact to a community. The program is composed of two main components: low interest loans to conduct preliminary endangerment assessments of underutilized properties; and loans for the cleanup or removal of hazardous materials also at underutilized urban properties. These loans are available to developers, businesses, schools, and local governments.

For additional information on the VCP or UCLP please visit DTSC's web site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov). If you would like to meet and discuss this matter further, please contact Mr. Alberto Valmidiano Project Manager, at (818) 551-2870 or me, at (818) 551-2877.

Sincerely,



Harlan R. Jeché  
Unit Chief  
Southern California Cleanup Operations Branch – Glendale Office

Enclosure

cc: Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief  
Planning and Environmental Analysis Section  
CEQA Tracking Center  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, California 95812-0806

**COMMENT LETTER 4: DEPARTMENT OF TOXIC SUBSTANCES CONTROL,  
GLENDALE**

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**Response 4-1:** As discussed in Section 4.1.3 of the EIR, the potential for encountering contaminated soils during project site construction activities is considered to be low. However, in the event that soil contamination is suspected during construction LADWP will either sample the area prior to excavation or sample the material after excavation to determine the proper characterization of the waste. A representative number of samples will be collected and submitted to a State certified hazardous waste laboratory. Based on the laboratory results LADWP will obtain the necessary permits and approvals, if any, for disposal of the waste.

**Response 4-2:** The Urban Cleanup Loan Program is not applicable to the proposed LADWP VGS project. The LADWP VGS site is not a property which requires the cleanup of hazardous materials for the sole purpose of redevelopment .

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7, REGIONAL PLANNING

IGR/CEQA BRANCH

120 SO. SPRING ST.

LOS ANGELES, CA 90012

PHONE (213) 897-6536

FAX (213) 897-1337



*Flex your power!  
Be energy efficient!*

Ms. Kathy C. Stevens  
South Coast Air Quality Management District  
21865 East Copley Drive  
Los Angeles, CA. 91765

RE: IGR/CEQA # 011202 NY  
Installation of a combined Generating Facility  
At the Valley Generating Station  
LA / 5/ 36.36

December, 19, 01

Dear Ms. Stevens:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed Installation of a combined Generating Facility At the Valley Generating Station.

- 5-1 [ We would like to remind you that any transportation of heavy construction equipment and/or materials  
5-2 [ 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.

If you have any questions regarding this response, you can reach me at (213) 897-4429 and refer to IGR/CEQA # 011202 NY.

Sincerely,

*Nerses Gevorgian*  
For: STEPHEN J. BUSWELL  
IGR/CEQA Branch Chief  
Transportation Planning Office  
Caltrans, District 7

## **COMMENT LETTER 5: CALIFORNIA DEPARTMENT OF TRANSPORTATION**

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**Response 5-1:** If necessary, LADWP will obtain a Caltrans transportation permit for the transportation of heavy construction equipment and/or materials that require the use of oversized-transport vehicles on State highways.

**Response 5-2:** Section 4.7 of the EIR discusses Transportation/Traffic impacts. The evaluation concluded that the proposed project would not cause significant traffic impacts. The evaluation also indicates that because most truck traffic would be material deliveries, the truck trips likely would be spread throughout the day, with few trips during peak hours.



CITY OF ANAHEIM, CALIFORNIA

Planning Department

December 20, 2001

Ms. Kathy C. Stevens  
c/o CEQA Section  
South Coast Air Quality Management District  
21865 East Copley Drive  
Diamond Bar, CA 91765-4182

**Re: Notice of Completion of a Draft Environmental Impact Report: Proposed Los Angeles Department of Water and Power's Installation of a Combined Cycle Generating Facility at the Valley Generating Station Project (SCH# 2001051035)**

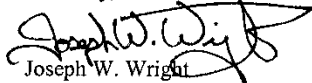
Dear Ms. Stevens:

6-1 Thank you for the opportunity to review the above-referenced document. City staff has reviewed the document and has no comments at this time.

6-2 Please forward any subsequent public notices and/or environmental documents regarding this project to my attention at the address listed below.

If you have any questions regarding this response, please do not hesitate to contact me at (714)765-5139, Extension 5750.

Sincerely,

  
Joseph W. Wright  
Associate Planner

JWRIGHT/ENVIRO/OTHER/AQMD/LA DWP

200 South Anaheim Boulevard  
P.O. Box 3222, Anaheim, California 92803 • (714) 765-5139 • www.anaheim.net



## **COMMENT LETTER 6: CITY OF ANAHEIM**

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**Response 6-1:** The SCAQMD notes that the City of Anaheim staff has no comments on the Draft EIR at this time.

**Response 6-2:** The SCAQMD will forward any subsequent public notices and/or environmental documents regarding this project to Joseph W. Wright as requested.