

ABALONE COVE WELL CONVERSION PROJECT

RESPONSE TO COMMENTS AND FINAL ENVIRONMENTAL IMPACT REPORT

LEAD AGENCY

CITY OF RANCHO PALOS VERDES

PREPARED BY

VISTA

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1.0 INTRODUCTION

This document is the Response to Comments and Final Environmental Impact Report (EIR) for the Abalone Cove Well Conversion Project. This document contains all information available in the public record related to the Draft EIR as of July 5, 1997. This document responds to comments in accordance with Section 15088 of the California Environmental Quality Act (CEQA) Guidelines.

This document contains four (4) sections. In addition to this Introduction these sections are: Background; Public Participation and Review; Responses to Comments; and Appendices.

The Background Section is provided as Section 2.0 of this document. The Background Section outlines the discretionary process that will happen or has happened related to the proposed project.

The Public Participation and Review Section is provided as Section 3.0 of this document. This section outlines the various methods the City of Rancho Palos Verdes - Redevelopment Agency (RDA) has used to provide public review and solicit input on the EIR. This section also identifies the various methods taken by the RDA to provide public review and receive public comment on the proposed project and alternatives to the proposed project.

The Responses to Comments Sections is provided as Section 4.0 of this document. The Responses to Comments Section contains written comments received from agencies, groups, organizations, and individuals received by the RDA as of July 5, 1997, and responses to each comment. This document responds to comment letters ACWCP # 1 to ACWCP #11.

The Appendices to this document include the following: 1. Appendix A - Comment Letters; and 2. Appendix B - Correspondence.

The Comment Letters are provided in Appendix A of this document. Appendix A contains copies of the correspondence received during the public review period established by the City and State for the Draft EIR and the RREIR. The letters and responses are provided in Section 4.0.

This document will become part of the official public record related to the proposed project. Based upon the information contained in the public record, the decision makers

1.0 Introduction

will be provided with an accurate and complete record of all information related to the environmental consequences of the proposed project.

The document is not intended to provide justification of the proposed project or an alternative to the proposed project. The document does provide elected decision makers, potential responsible and trustee agencies, and citizens with information regarding the issues and concerns addressed during the environmental analysis process.

2.0 Background

1. **Maintenance of existing dewatering system** - This includes the inspection, maintenance, and replacement of established pumps, wells, and power supply.
2. **Expansion of existing dewatering system** - An additional eight (8) dewatering wells were recommended, as well as additional monitoring wells and slope indicators.
3. **Domestic sewer system** - Construction of sewers to connect 90 domestic systems to the County Sanitation Districts' service main. This will reduce water infiltration into the slide by up to 30 acre-feet per year.
4. **Individual lot storm drainage improvements** - Recommended measures include roof drains, gutters, downspouts, and yard drains.
5. **Storm drainage, Altamira Canyon drainage area improvements** - This measure includes drainage improvements in Altamira Canyon and constructing street improvements to direct runoff to Altamira Canyon.
6. **Toe Berm** - Placement of approximately 50 feet of fill (300,000 cubic yards) along the beach, with associated shore protection, landscaping, etc. Most of the fill would be obtained from the area between the beach and Palos Verdes Drive South.

The technical report concluded that the sliding would be permanently arrested, if all of these methods are implemented. The panel reported that it may be practical to implement the proposed methods in a phase sequence. Further, if slide stability is attained in the early phases, it may be feasible to reduce the extent of implementation of the remaining methods.

Based on these recommendations, the County of Los Angeles Department of Public Works prepared an Environmental Impact Report (Envirosphere Company, February 1989) for the implementation of the recommendations.

PROJECT CHARACTERISTICS

The proposed project consists of improvements to help to lower the groundwater level in the Abalone Cove Landslide area and the maintenance of the improvements. This will be accomplished by the construction of a dewatering well system. A dewatering well is a well that pumps water from below the surface to the surface. All improvements will be installed on private property. The RDA will acquire permission from the individual property owners to install and operate the system. The

2.0 Background

proposed Abalone Cove Well Conversion Project will be accomplished in two (2) specific phases. The two phases are as follows:

Phase I - Dewatering Well System - Construction

Phase II - Dewatering Well System - Operation

ENVIRONMENTAL ANALYSIS

In 1995, the RDA determined that preparation of a focused EIR would be necessary in order to address specific issues associated with the implementation of the Abalone Cove Well Conversion Project. The firm VISTA was assigned the contract to prepared the environmental documentation.

A Notice of Completion of Draft Environmental Impact Report for the Abalone Cove Well Conversion Project was filed with the State of California on August 13, 1996. At the RDA's request the State established an official review period for the Draft EIR beginning on August 13, 1996, and ending on September 30, 1996. A copy of the Notice of Completion and Notice of Completion and Draft EIR - Mailing List is provided in the Public Participation and Review Section of the Draft RREIR.

A Notice of Completion of Draft Revised and Recirculated Environmental Impact Report (RREIR) for the Abalone Cove Well Conversion Project was filed with the State of California on January 1, 1997. At the RDA's request the State established an official review period for the Draft EIR beginning on April 1, 1997, and ending on May 15, 1997. A copy of the Notice of Completion and Notice of Completion and Draft RREIR - Mailing List is provided in the Draft RREIR.

The RDA made the Responses to Comments and Final EIR available for public review and inspection at City Hall on July 3, 1997. The document was mailed to all potential responsible and trustee agencies, interested citizens, and groups that commented on the Draft EIR. A copy of the distribution list is provided in the Public Review and Participation Section (Section 3.0).

REDEVELOPMENT AGENCY ACTIONS

It is anticipated that the RDA will review the proposed project and environmental documentation at their July 15, 1997 meeting.

3.0 PUBLIC PARTICIPATION AND REVIEW

The RDA notified all potential responsible and trustee agencies, interested citizen groups, and individuals of the preparation of the Draft EIR and the Draft RREIR for the Abalone Cove Well Conversion Project. The public participation process included a program for the Notice of Preparation, Draft EIR, Notice of Preparation of the Draft RREIR, Draft RREIR, and this Response to Comments and Final EIR. The following items were accomplished to solicit public input and comment on the proposed project and environmental documentation.

INITIAL STUDY AND NOTICE OF PREPARATION

1. An Initial Study (IS) was prepared in July 1995 by the City. A copy of the IS is included in the NOP/IS and is provided in Appendix A of the Draft EIR.
2. A Notice of Preparation (NOP) was prepared July 1995. A copy of the NOP is provided in Appendix A of the Draft EIR (portion of Attachment No. 1). A copy of the NOP including the IS was circulated for a 30-day public review period. The public review period began on July 17, 1995, and ended on August 16, 1995.
3. The NOP/IS was mailed to potential responsible agencies, trustee agencies, and interested parties by certified mail return receipt requested on July 17, 1995. A copy of the NOP/IS and the Notice of Availability and Mailing List are provided in Appendix A of the Draft EIR.
4. A request that the NOP be posted was mailed to the County Clerk by certified mail return receipt requested on July 17, 1995. The NOP was posted by the County Clerk for a thirty (30) period. A copy of the request is included in Appendix A of the Draft EIR.
5. A detailed questionnaire was mailed to the County of Los Angeles - Fire Department to solicit their comments related to the proposed project. A copy of the questionnaire is included in Appendix A of the Draft EIR.
6. The County of Los Angeles - Fire Department responded to the questionnaire. Their response is included in Appendix A to the Draft EIR.

3.0 Public Participation and Review

7. City staff contacted Ms. Kathy Snell by phone to solicit her response to the NOP/IS. She indicated that she had not received a copy of the NOP/IS.
8. A copy of the NOP/IS was mailed by certified mail return receipt requested to Ms. Kathy Snell on September 15, 1995.
9. A review period for Ms. Snell's comment was established ending on September 30, 1995. A copy of the letter providing the extended review period was included in Appendix A of the Draft EIR.
10. Comments were received from Ms. Kathy Snell. A copy of the comments was included in the Appendix of the Draft EIR.
11. Ms. Kathy Snell's comments were bracketed and a written response was prepared for each comment. The response is included in Appendix A of the Draft EIR.
12. In response to Ms Kathy Snell's written comments, additional environmental topics (Earth Resources and Water Resources) were included in the Draft EIR.
13. In response to Ms Kathy Snell's written comments, additional alternatives were included in the Draft EIR.
14. Written comments were received on the NOP/IS during the official review period from the following:
 - A. State of California - Business and Transportation Agency, Department of Transportation, District 7;
 - B. Southern California Association of Governments;
 - C. California Native Plant Society; and
 - D. Southern California Edison Company.

Copies of the written comments are included in Appendix A of the Draft EIR.

3.0 Public Participation and Review

DRAFT EIR

1. A Notice of Completion (NOC) of Draft EIR for the Abalone Cove Well Conversion Project was filed with the State of California on August 13, 1996.
2. At the RDA's request the State established an official review period for the Draft EIR beginning on August 13, 1996, and ending on September 30, 1996.
3. A copy of the NOC for the Draft EIR is provided in Appendix C of the Draft RREIR.
4. A copy of the NOC and Draft EIR - Mailing List is provided in Appendix D of the Draft RREIR.
5. Written comments were received on the Draft EIR during the official review period. Additionally, correspondence and additional studies were accomplished and received after the official review period.

A. Written comments prior to the close of the official review period:

- State of California - Governor's Office of Planning and Research;
- State of California - Transportation Planning Office, Department of Transportation, District 7;
- Southern California Association of Governments;
- Planning and Property Management Section, County Sanitation District of Los Angeles County;
- California Native Plant Society; and
- Ms. Kathy Snell.

B. Written comments after the close of the official review period:

- Mr. Perry Ehlig, RDA and City Geologist; and
- Southern California Edison Company.

3.0 Public Participation and Review

6. Copies of the written comments and responses to each comment related to the Draft EIR will be provided in the Response to Comments and Final EIR.
7. The RDA Staff reviewed the comments on the Draft EIR and information provided by the RDA's Geologist. Based on the comments and information the Attorney for the RDA determined that a Draft RREIR should be prepared.

DRAFT RREIR

1. A Notice of Completion (NOC) of Draft RREIR for the Abalone Cove Well Conversion Project was filed with the State of California on January 18, 1997.
2. At the RDA's request the State established an official review period for the Draft RREIR beginning on April 1, 1997 and ending on May 15, 1997.
3. A copy of the NOC of the Draft RREIR is provided in Appendix A of the Draft RREIR.
4. A copy of the NOC of the Draft RREIR - Mailing List is provided in Appendix B of the Draft RREIR.

RESPONSE TO COMMENTS AND FINAL EIR

1. The RDA made the Response to Comment and Final EIR available for public review and inspection at the City Hall on July 3, 1997.
2. The Response to Comments and Final EIR was mailed to all potential responsible and trustee agencies, interested citizens, and groups that commented on the Draft EIR and the Draft RREIR.
3. A copy of the distribution list for the Response to Comments and Final EIR was made available at the City of Rancho Palos Verdes City Hall.

4.0 RESPONSES TO COMMENTS

The Draft EIR for Abalone Cove Well Conversion Project was distributed to potential responsible and trustee agencies, interested groups, organizations, and individuals. The report was made available for public review and comment for a period of 45 days. The public review and comment period for the Draft EIR established by the State commenced on August 13, 1996, and expired on September 27, 1996.

The Draft RREIR for Abalone Cove Well Conversion Project was distributed to potential responsible and trustee agencies, interested groups, organizations, and individuals. The report was made available for public review and comment for a period of 45 days. The public review and comment period for the Draft RREIR established by the State commenced on April 1, 1997, and expired on May 15, 1997.

Although the CEQA review period on the Draft EIR expired on May 15, 1997, the RDA has accepted and responded to comments. During the review period the public has made phone inquires related to the proposed project. All those persons inquiring by phone were requested to make comments on the project or Draft EIR in writing prior to the close of the public review period.

Correspondence letters received by the RDA through July 5, 1997 have been numbered consecutively using the initials ACWCP (Abalone Cove Well Conversion Project) in the order received by the City and responded to in this document (ACWCP #1 through ACWCP #11). Comments from each letter which raised significant environmental issues have been correspondingly numbered using initials of commenting party (i.e. State Clearinghouse is designated as "SCH" etc.). The responses to comments have been correspondingly numbered and are provided in the following section. Responses are only presented for each comment which raised a significant environmental issue. A list of the comment letters received, individual written comments received, and responses are summarized on the following pages.

Several comments do not address the completeness or adequacy of the EIR, do not raise significant environmental issues, or do not request additional information related to potential environmental impacts. Consistent with section 15088 of the CEQA Guidelines, substantive responses to such comments are not appropriate within the context of CEQA. Such comments are responded to with a "comment acknowledged" reference. These comments have been forwarded to all appropriate decision makers for their review and consideration.

**(ACWCP)
LIST OF COMMENTS AND
COMMENT/RESPONSE SERIES**

WRITTEN COMMENTS	COMMENT/RESPONSE SERIES
1. Mr. Steve Buswell IGR/CEQA Coordinator Transportation Planning Office Department of Transportation District 7 120 South Spring Street Los Angeles, California	ACWCP No. 1 Caltrans #1 - #1
2. Ms. Marie L Pagenkopp Engineering Technician Planning and Property Management Section County Sanitation District of Los Angeles County Post Office Box 499998 Whittier, California 90607-4998	ACWCP No. 2 CSDLAC #1 - #1
3. Ms. Viviane Doche Manager, Intergovernmental Review Southern California Association of Governments 818 West Seventh Street, 12th Floor Los Angeles, California 90017-3435	ACWCP No. 3 SCAG #1 - #1
4. Ms. Ellen Brubaker ¹ California Native Plant Society South Coast Chapter 2220 South Walker San Pedro, California 90731	ACWCP No. 4 CNPS #1 - #12
5. Ms. Kathy Snell ¹ 8 Vanderlip Drive Rancho Palos Verdes, CA 90275	ACWCP No. 5 KS #1 - KS #116
6. Ms. Phyllisa J. Eisentraut Regional Information Center California Historic Resources Inventory UCLA Institute of Archaeology Fowler Museum of Cultural History Los Angeles, California 90095	ACWCP No. 6 RIC #1 - #1

Source: VISTA

1. Late comment. Comment submitted after close of the public review period for the Draft EIR.

**(ACWCP)
LIST OF COMMENTS AND
COMMENT/RESPONSE SERIES**

WRITTEN COMMENTS	COMMENT/RESPONSE SERIES
7. Mr. Aaron Allen Department of the Army Los Angeles District, Corps of Engineers 911 Wilshire Boulevard Los Angeles, California 90017	ACWCP No. 7 DOA #1 - #1
8. Ms. Viviane Doche Manager, Intergovernmental Review Southern California Association of Governments 818 West Seventh Street, 12th Floor Los Angeles, California 90017-3435	ACWCP No. 8 SCAG #2 - #2
9. Ms. Marie L Pagenkopp Engineering Technician Planning and Property Management Section County Sanitation District of Los Angeles County Post Office Box 499998 Whittier, California 90607-4998	ACWCP No. 9 CSDLAC #2 - #2
10. Ms. Kathy Snell 8 Vanderlip Drive Rancho Palos Verdes, CA 90275	ACWCP No. 10 KS #117 - KS #157
11. Ms. Gail C. Kobetich United States Department of the Interior Fish and Wildlife Service 2730 Loker Avenue West Carlsbad, California 92008	ACWCP No. 11 USDI #1 - USDI #6
12. State of California State Clearinghouse 1400 Tenth Street Sacramento, California 95814	ACWCP No. 12 SCH #1 - SCH #6

Source: VISTA

4.0 Responses to Comments

ACWCP No. 1

CALIFORNIA DEPARTMENT OF TRANSPORTATION - DISTRICT 7

COMMENT CALTRANS #1	RESPONSE CALTRANS #1
<p>Thank you for including the State of California Department of Transportation in the review process for the above referenced document.</p> <p>Based on our review finding, we have no comment at this time; however, we will contact you again should we identify anything that should be brought to your attention.</p> <p>If you have any questions regarding this response, please call me at (213) 897-4429.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

4.0 Responses to Comments

ACWCP No. 2

COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

COMMENT CSDLAC #1	RESPONSE CSDLAC #1
<p>The County Sanitation Districts of the Los Angeles County (Districts) received a <u>Draft Environmental Impact Report</u> for the subject project on August 13, 1996. The proposed development is located within the jurisdictional boundaries of District No. 5. We offer the following comments regarding sewerage service:</p> <ul style="list-style-type: none">• The Districts maintain facilities within the project area; however, they will not be affected <p>If you have any questions, please contact the undersigned at (310) 699-7411, extension 2717.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

4.0 Responses to Comments

ACWCP No. 3

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

COMMENT SCAG #1	RESPONSE SCAG #1
<p>We have reviewed the above referenced document and determined that it is not regionally significant per Areawide Clearinghouse criteria. Therefore, the project does not warrant clearinghouse comments at this time. Should there be a change in the scope of the project, we would appreciate the opportunity to review and comment at that time.</p> <p>A description of the project will be published in the October 1, 1996 Intergovernmental Review Report for public review and comment.</p> <p>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 Betty Mann at (213) 236-1902.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

4.0 Responses to Comments

ACWCP No. 4

CALIFORNIA NATIVE PLANT SOCIETY

COMMENT CNPS #1	RESPONSE CNPS #1
<p>The South Coast Chapter of The California Native Plant Society has reviewed the above mentioned Draft Environmental Impact Report (DEIR).</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>
COMMENT CNPS #2	RESPONSE CNPS #2
<p>We found that the document includes some contradicting language which needs to be corrected:</p> <p>a) Impacts in Significant Biological Resources</p> <p>According to the executive summary (p.xvi) no biological resource impact on significant biological resources are anticipated. Only on page xxv of the summary is stated that the operation of the well will destroy the springs and the stream including the associated vegetation, without evaluating the impact as significant.</p> <p>On page 62 it is clearly stated that this is considered a <u>significant unavoidable</u> adverse impact on biological resources, and we agree regarding the significance of this impact. To our knowledge, the State of California has a no wetland loss policy, since wetlands are considered to be sensitive resources.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to the Errata of this Response to Comments and Final EIR has been revised to state:</p> <p style="padding-left: 40px;">No impacts on significant biological resources are anticipated for <i>from</i> the construction of all the components (well, discharge pipeline, and access, and power poles and lines) of the dewatering well system. (Page xvi).</p> <p>The impacts from the construction of the power poles and lines are described in the General Summary on page xvii. The impacts from the construction of the pipeline are presented on page xxii of the General Summary.</p>
COMMENT CNPS #3	RESPONSE CNPS #3
<p>Also, according to the survey results from the Manomet Observatory for Conservation Sciences of the past years, there were cactus wrens and a gnatcatcher pair seen in the vicinity of the project, which are considered to be sensitive biological resources.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The locations of California gnatcatchers and San Diego cactus wrens in the vicinity of the proposed project are shown on Exhibit 19.</p>
COMMENT CNPS #4	RESPONSE CNPS #4
<p>The separation within the executive summary between impacts, impacts mitigated to a less than significant level and unavoidable adverse impacts is extremely confusing and may even be misleading, since one expects to see all impacts the DEIR analyzes summarized under the first part with the general heading "Draft Environmental Impact Report".</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>In the Draft EIR in Section 1.0 Executive Summary and in Section 8.0 Environmental Summaries all project and cumulative impacts have been identified. Impacts have been categorized to allow commentors and decision makers an opportunity to clearly understand the effects of the project. they are also categorized in accordance with the State</p>

4.0 Responses to Comments

	CEQA Guidelines Sections 15093 and 15094 to allow decision makes clarity related to required findings and the necessary facts to support findings.
COMMENT CNPS #5	RESPONSE CNPS #5
<p>b) Impacts on Biodiversity Again, according to the executive summary the “conversion of the existing monitoring well to operate as dewatering well not have an impact on plant or animal biodiversity...” What is this statement based on? It is quite obvious to us that the loss of surface water and the lowering of the ground water will also cause the loss of the riparian elements and the willows in Kelvin Canyon, and thereby the loss of biodiversity.</p>	<p>The statement is based upon the information presented in the Draft EIR Section 5.0 Biological Resources and Appendix B - Biological Assessment. Significance of an impact is based upon criteria presented in Section 5.0 of the Draft EIR.</p>
COMMENT CNPS #6	RESPONSE CNPS #6
<p>c) Size of the Impacted Coastal Sage Scrub According to the summary of impacts and their significance, the proposed project will have an impact on approximately 64 square feet coast sage scrub. The same number is given on page 62, considering 4 power poles. However, on page 61 is stated that no more than 5 power poles are anticipated, which would, in the worst case scenario impact 80 square feet. Although these numbers may be small, they indicate that the DEIR is not thought through thoroughly.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to the Errata section of this Response to Comments and Final EIR. The EIR has been revised to state:</p> <p style="text-align: center;">POWER LINES AND POLES</p> <p>The proposed project will impact existing biological resources by the construction of power lines and poles. It is presently anticipated that not more than <i>four (4) five (5)</i> power poles will need to be constructed. The construction of the power poles will impact approximately <i>64 80</i> square feet of Coastal sage scrub habitat. This assumes that a maximum or <i>four (4) five (5)</i> power poles will be installed. Each power pole will impact an approximately four (4) square feet area. A worst case assumption has been made that the entire <i>64 80</i> square feet of Coastal sage scrub habitat will be lost. The significance of this impact is discussed below (page 63).</p> <p>The impact has been evaluated on a “worst case” bases assumption that all habitat modified will be Coastal sage scrub.</p>
COMMENT CNPS #7	RESPONSE CNPS #7
<p>d) Evaluation of Project Alternatives Why is the no project alternative not considered to be</p>	<p>The Draft EIR indicates that:</p>

4.0 Responses to Comments

<p>environmentally superior, although it would not have the adverse impacts of the project?</p>	<p>The No Project/No Development Alternative is technically feasible. It does not meet the objectives of the proposed project. It is environmentally superior to the proposed project and remains under further consideration (page 111).</p>
<p>COMMENT CNPS #8</p>	<p>RESPONSE CNPS #8</p>
<p>e) Evaluation of The Stream Bed With Riparian Elements According to page 62 Kelvin Canyon "...is <u>one of several</u> canyons with perennial water on the west side of the hill from San Pedro to Malaga Creek in Palos Verdes Estates".</p> <p>However, the attached Biological Assessment Rancho Palos Verdes Redevelopment Area notes: "These <u>two</u> [Klondike and Kelvin Canyons] are the only canyons with perennial water on the west side of the hill from San Pedro to Malaga Creek in Palos Verdes Estates and therefore, unique for wildlife and local habitat diversity." (p.12). Of the two named canyons, Kelvin Canyon is the more natural, since the water in Klondike Canyon is already mostly collected in plastic pipes. In our opinion this makes Kelvin Canyon absolutely unique and we would like to know, where the other several canyons with year round running water are, since we are not aware of them.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to the Errata section of this Response to Comments and Final EIR. The EIR has been revised to state:</p> <p style="padding-left: 40px;">...This is one of several <i>There are two (2)</i> canyons with perennial water on the west side of the hill from San Pedro to Malaga Creek in Palos Verdes Estates (page 62).</p>
<p>COMMENT CNPS #9</p>	<p>RESPONSE CNPS #9</p>
<p>Additionally we have several questions that need to be clarified:</p> <ul style="list-style-type: none"> • If the significant impact of the loss of the spring, perennial water and riparian vegetation is really unavoidable, it should at least be attempted to mitigate that significant impact. How will the loss of wetland, riparian vegetation and thereby biodiversity be mitigated? 	<p>An overall objective of the proposed project is to help to eliminate groundwater. It has been assumed "worst case" that the reduction in groundwater will eliminate the spring and effect the habitat. Mitigation is not therefore possible. An alternative has been presented that would eliminate this impact (No Project/No Development Alternative).</p>
<p>COMMENT CNPS #10</p>	<p>RESPONSE CNPS #10</p>
<ul style="list-style-type: none"> • According to the proposal, the discharge pipe will only be buried for about 50 feet and otherwise run on the surface. Will it therefore not be more sensitive against damages and may the maintenance of a surface pipe not require occasional or even regular control checks? If so, a path along the pipeline would be an increased impact. <p>According to mitigation measure 2, sensitive biological</p>	<p>The PVC pipe in the RDA area has not been subject to significant damage (pers. comm. RDA Staff October, 1996). Replacement of PVC pipe can be accomplished in a manner similar to the proposed project construction. No path is planned or anticipated to be needed or to develop.</p> <p>Mitigation Measure 2 requires sensitive biological resources to be avoided. The pipeline would need to be rerouted, if an impact was determined to potentially occur during</p>

4.0 Responses to Comments

<p>resources have to be avoided by the pipeline, but what if an impact turns out to be unavoidable?</p> <p>The proposed way of the pipeline is indicated on Exhibit 16 which shows the distribution of the existing plant communities in the project area. However it seems it has to cross cactus scrub as well as coastal sage scrub, two of the most sensitive plant communities in the State of California. Therefore appropriate replacement ratios should be included in the mitigation measures in case that impacts may be unavoidable.</p>	<p>construction. Mitigation Measure 2 states:</p> <ol style="list-style-type: none"> 2. Prior to construction, project specifications shall be established providing written proof to the Director of Planning, Building, and Code Enforcement that the construction route of the proposed discharge pipeline will avoid sensitive biological resources. The route of the discharge pipeline will be flagged by a qualified biologist. The biologist will provide field inspection of the pipeline construction to verify that the route has been constructed as flagged. The biologist will submit a written certification of compliance with these routing requirements. Compliance with this measure shall be monitored by the Director of Planning, Building, and Code Enforcement.
<p>COMMENT CNPS #11</p>	<p>RESPONSE CNPS #11</p>
<ul style="list-style-type: none"> • How will this proposed project that will cause the destruction of a locally unique biological resource fit into the proposed subregional NCCP ? <p>According to the Manomet Observatory for Conservation Sciences gnatcatcher and cactus wren survey, one of the localities that support critical tracts of coastal sage scrub habitat on the Peninsula are areas within the Rancho Palos Verdes Redevelopment Plan area from Klondike Canyon west to Altamira Canyon at elevations greater than approximately 400 feet. The proposed project lies within this area.</p> <p>The importance of surface water for wildlife is undisputed in the DEIR, but not considered significant. The City, who is also the lead agency for the NCCP plan should keep in mind that one of the hopes for the NCCP is that with its implementation the possible future endangerment of other species of the habitats incorporated in the program will be halted. The inclusion of a perennial stream and the restoration of native habitat surrounding it, surely would fit in this program better than the destruction of the last natural perennial stream on this side of the hill between San Pedro and Palos Verdes Estates.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Proposed project impacts on water resources are discussed in the Draft EIR in Section 5.0 Environmental Analysis - Water Resources.</p> <p>The City is currently working with the California Department of Fish and Game and other jurisdictions to develop a coastal sage scrub natural Communities Conservation Plan (NCCP). NCCP's are designed to preserve large areas of productive, viable habitat, while allowing for development to occur where marginal or isolated small areas of significant habitat occur.</p>

4.0 Responses to Comments

COMMENT CNPS #12	RESPONSE CNPS #12
<p>Last, but not at least, we would like to repeat our concern voiced in our comments to the Initial Study that the landslide stabilization measures are piece-mealed . On page vi of the DEIR is clearly stated “The proposed project is one (1) of several actions that need to be implemented in order to fully stabilized the Abalone Cove Landslide.” If so, why are they not all treated in one EIR, so that their impacts and possible alternatives can be fully evaluated?</p> <p>Since the conversion of the well alone will not stop the landslide we urge you to not allow the destruction of the only natural year-round running stream on the south side of the hill.</p>	<p>The proposed project is not a part of a piecemeal analysis. Several projects have been recommended by the “Panel of Experts” These projects in general were the subject to a Program EIR related to the 1984 Technical Panel Report “Feasibility of Stabilizing Abalone Cove Landslide” and County of Los Angeles Department of Public Works EIR prepared by Envirosphere Company, 1989 for the implementation of the recommendations. The Abalone Cove Well Conversion Project EIR is a project level EIR for the specific actions listed in the project description.</p> <p>The Abalone Cove Well Conversion Project EIR does not incorporate by reference the findings of the Program level EIR, rather through the environmental documentation presented evaluates the proposed project.</p> <p>The cumulative effect of this project in conjunction with other past, present, and reasonably foreseeable future was addressed in the Draft EIR.</p>

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ACWCP #5

MS. KATHY SNELL

COMMENT KS #1	RESPONSE KS #1
<p>Due to the fact that the city scheduled important development code revision hearings during the same review period for the Draft EIR, and the code revisions constitute the "taking of my property right," I am asking for an extension of time to properly review this EIR which was scheduled to be completed a few years ago. As you are aware, I am one of the few land owners who will be effected by the loss of my right to have a cow, keep bees, keep goats for fire protection, etc. This EIR is the most massive document, measuring 2" thick. The dewatering of Kelvin Canyon also constitutes the taking of rights (riparian). It is not reasonable for one to believe that I could review and comment on this document while my property rights were being attacked with remarks from the city council to reduce horses to 3, license goats and sheep and not allow bees and cows. The actions of the City/RDA/attorney appear to be very punitive to me personally.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The EIR provides Mitigation Measure 8 to reduce potential impacts to riparian rights to a level of insignificance. Mitigation Measure 8 states:</p> <p>8. Prior to construction, project specifications shall be established to make project-extracted groundwater available for non-potable purposes to those persons down stream whose riparian rights may be adversely affected by this project. Such persons may be required to demonstrate to the satisfaction of the City Attorney, legally cognizable rights to the extracted water, and shall execute and cause to be recorded a waiver, assumption of risk and indemnity agreement in a form approved by the City Attorney. Compliance with this measure shall be verified by the Director of Public Works.</p>
COMMENT KS #2	RESPONSE KS #2
<p>THIS DRAFT EIR FAILED TO EVALUATE THE</p> <p style="text-align: center;"><u>LOSS OF WETLANDS</u></p> <p>AS THE PUMPING OF THE WELL WILL DEplete KELVIN CANYON SPRING WHICH FLOWS OVER 2,000 FEET OFFERING THE ONLY REMAINING WATERING SOURCE ON THE SOUTH SIDE OF THE PENINSULA. THE WETLANDS WILL DRY UP. LOSS OF WETLANDS AND THE LAWS PROTECTING WETLANDS MUST BE DISCUSSED. THE IMPACT MUST AND CAN BE MITIGATED.</p>	<p>Please refer to response to comment CNPS #8 and CNPS #9 for a discussion of biological impacts and springs.</p> <p>Please refer to the Errata section of this Response to Comments and Final EIR. The EIR has been revised to state:</p> <p style="text-align: center;">...This is one of several There are two (2) canyons with perennial water on the west side of the hill from San Pedro to Malaga Creek in Palos Verdes Estates (page 62).</p>

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COMMENT KS #3	RESPONSE KS #3
<p>ON 9-27-96, I MADE ANOTHER VISUAL EXAMINATION OF THE PROJECT AREA. I HAVE LIVED IN THE PROJECT AREA SINCE 1974 AND PROBABLY KNOW THE AREA BETTER THAN ANYONE. THE SMALL FOOT TRAIL LEADING UP A TREACHEROUS, STEEP MOUNTAIN SIDE HAS BEEN MADE INTO AN EIGHT FOOT WIDE, 4 WHEEL DRIVE DIRT ROAD BECAUSE OF THE NEGLIGENCE OF PERSONS WHO WORK FOR THE CITY, THE RDA, ACLAD, THE GEOLOGIST, ETC. BY USING THEIR 4W DRIVE VEHICLES AND MOTORIZED CARTS ILLEGALLY ON A DIRT FOOT TRAIL. ALONG THE WEST SIDE OF THIS TRAIL WHICH RUNS SOUTHEAST TO NORTHWEST TOWARD DEL CERRO PARK, THE STEEP TRAIL SHOWS EVIDENCE OF A FLASH FLOOD WHICH GAINED SPEED AND WATER VOLUME WHILE FLOWING DOWN THE MOUNTAINSIDE ON THE ILLEGALLY ESTABLISHED DIRT ROAD. THE POWER OF THE NEWLY DIRECT WATER WASHED OUT PART OF THE SUPPORT OF THE DIRT ROAD AND PLUMMETED INTO WHAT IS CONSIDERED TO BE A PROTECTED GNATCATCHER HABITAT. THE ILLEGAL ROAD ALSO HAS INTRODUCED DOMESTICATED DOGS AND CATS INTO THE PROTECTED HABITAT AREAS FOR THE GNATCATCHER AND CACTUS WREN. GNATS WHERE IN THIS AREA. MUCH FOOD SUPPLY WILL BE LOST WHEN THE PUMPING OF THE WELL SLOWS DOWN OR DRIES UP THE STREAMS. GNATS WERE SEEN ON SITE. THE IMPACT MUST BE DISCUSSED AND MITIGATED.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The existing dirt road was not illegally established. The existing dirt road has been in existence for several years. The existing dirt road is one (1) of a series of dirt roads in the area the serve as access and for fire protection. The access road will be improved with gravel. Aerial photographs available for review at City Hall indicate that the dirt road has been in existence for a considerable period. The seasonal vegetation that occurs on dirt roads has been progressively worn by vehicular and pedestrian movement on the path over the recent past (field observations VISTA staff Spring and Summer 1996).</p> <p>Approximately 100 cubic yards of gravel will be utilized to improve the existing dirt road. The gravel will be trucked to the site and will access the existing dirt road from Vanderlip Drive. A total of 24 (each way) truck trip are estimate to be need to improve the access. A reduction in existing erosion of the access road will occur with gravel improvements.</p> <p>No improvements are proposed to the existing unimproved road at the Kelvin Canyon crossing. Total grading for the access road will be less than 15 cubic yards. Improvements to the access road will not introduce domestic animals.</p> <p>Biological resource impacts of the proposed project are described in Section 5.0 Environmental Analysis - Biological Resources. All improvements to the unimproved dirt road will occur in grassland habitat. No impacts to significant biological resources are anticipated from the improvements proposed for the access road.</p>
COMMENT KS #4	RESPONSE KS #4
<p>SINCE THE ILLEGAL ROAD WAS ESTABLISHED, LONG TERM CAMPERS USED THE ROAD TO ACCESS THE AREA AND MAINTAINED A SMOLDERING FIRE WHICH WAS USED FOR COOKING AND WARMTH AT NIGHT. IT TOOK THE FIRE DEPARTMENT HOURS TO ACCESS THE LOCATION, PUT THE FIRE OUT, AND REMOVE THEIR EQUIPMENT FROM THE AREA. THE FIREMEN REPORTED THAT THE EVIDENCE INDICATED THAT THE FIRE HAD BEEN SMOLDERING FOR A MONTH OR SO. THE SITE OF THE FIRE WAS 200 FEET SOUTH OF THE WELL</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #3 related to the access road.</p> <p>The impacts of the proposed project related to Public Services - Fire Protection are discussed in Section 4.0 of the Draft EIR. The County of Los Angeles Fire Department has indicated that they do not anticipate that the proposed project will have an impact. Base upon Fire Department communications no fire related project impacts</p>

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<p>LOCATION ADDRESSED IN THIS EIR. THE REPORT OF THIS FIRE SHOULD BE EVALUATE AND CONSIDERED TO COMPLETE THIS EIR. THIS IS A PICTURE OF THE LOGS WHICH WERE SMOLDERING:</p> <p style="text-align: center;"><i>[Photograph included in Appendix A of this Response to Comments and Final EIR]</i></p>	<p>are anticipated.</p>
<p>COMMENT KS #5</p>	<p>RESPONSE KS #5</p>
<p>IT IS OBVIOUS THAT ANY FURTHER WORK ON THE DIRT ROAD WILL BE DEVASTATING TO THE GNATCATCHER AND CACTUS WREN HABITATS, ESPECIALLY FROM WATER EROSION, INTRODUCTION OF DOMESTICATED ANIMALS, INCREASED FIRE RISK AND LOSS OF FOOD SOURCES. AS THE GNATCATCHER CAN NOT FLY FAR ENOUGH TO AVOID THE DANGER OF CATS, DOGS AND MAN, THE REMAINING BIRDS WILL BE WIPED OUT. SAFEGUARDS SHOULD BE PUT IN PLACE SO THIS DOES NOT CONTINUE. IF THE CITY AND RDA STAFF STOP TRANSITING THE ILLEGAL ROAD THEY MADE, THE AREA SHOULD RESTORE ITSELF BEFORE FURTHER DAMAGE. SEEDING IT WOULD FURTHER GUARANTEE RESTORATION.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #3 related to the access road.</p>
<p>COMMENT KS #6</p>	<p>RESPONSE KS #6</p>
<p>THIS EIR IS INCOMPLETE AS IT HAS FAILED TO ADDRESS THE EROSION WHICH WAS CREATED BECAUSE OF THE ESTABLISHMENT OF THE ILLEGAL DIRT ROAD AND THE FUTURE EROSION WHICH WILL RESULT BY FURTHER CONSTRUCTION OF THE ROAD.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #3 related to the access road.</p>
<p>COMMENT KS #7</p>	<p>RESPONSE KS #7</p>
<p>THE GRADE OF THE ROAD IS SO STEEP, SPECIAL DRAINAGE CULVERTS MUST BE CONSTRUCTED. THE EXISTING DIRT ROAD WILL NOT HANDLE HEAVY EQUIPMENT CARRYING GRAVEL. VEHICLES USING THE ROAD ARE SUBJECT TO ROLLING AND WOULD CRASH LAND IN THE GNATCATCHER HABITAT.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #3 related to the access road.</p>
<p>COMMENT KS #8</p>	<p>RESPONSE KS #8</p>
<p>THE DIRT ROAD GOES UP A MOUNTAIN SIDE FROM 500' TO 800' ELEVATION AND THE ROAD</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

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<p>DESIGN CAN NOT MEET ANY CODES OR REQUIREMENTS FOR SAFETY. NO VEHICLES CAN BE ASSURED OF REMAINING ON THE ROAD DURING RAIN OR WIND. VEHICLES FALLING OFF OF THIS STEEP ROAD WOULD HAVE A GREAT POTENTIAL OF CRASHING INTO ONE OF THE GNATCATCHER HABITATS. VEHICLE TRAFFIC FOR WELL MONITORING PLUS OTHER 4 WHEEL DRIVE VEHICLES DRIVING SO CLOSE TO HABITAT WILL AND HAS IMPACTED THE GNATCATCHERS AND CACTUS WREN. MITIGATION MEASURES ARE NEEDED.</p>	<p>Please refer to Response to Comment KS #3 related to the access road.</p>
<p>COMMENT KS #9</p>	<p>RESPONSE KS #9</p>
<p>DR. ELIG, THE CITY/RDA/PANEL OF EXPERT'S GEOLOGIST, WROTE CORRESPONDENCE TO THE CITY/RDA STATING THAT THE WELL SITE (OLD MONAHAN WELL) UNDER CONSIDERATION IS NOT SUITABLE. HE ALSO REPORTED THAT ONE OF THE NEW WELLS ON THE HON'S PROPERTY JUST OFF OF THE OLD CRENSHAW ROAD EAST OF KELVIN CANYON ON A FIRE ROAD WOULD ACCOMPLISHED THE SAME OBJECTIVE OF DEWATERING KELVIN CANYON SPRING. DR. ELIG ALSO MAINTAINS THAT THIS HON SITE IS CURRENTLY ACCESSIBLE AND HAS POWER CLOSE BY THE WELL. OTHER WELLS CAN BE DEWATERED, ALL WILL ACCOMPLISH REMOVING THE WATER FROM KELVIN CANYON SPRING, A NATURAL WETLANDS. DR. ELIG'S WORK AND MEMOS MUST BE INCLUDED AND CONSIDERED IN THIS EIR FOR PROPER EVALUATION OF THIS PROJECT OR THIS EIR WILL BE INCOMPLETE.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The report by Dr. Elig to the RDA has been provided in the Appendix to this Response to Comments and Final EIR. The "new well" site was evaluated in Section 6.0 of the Draft EIR - Alternatives as Alternative Site 2.</p>
<p>COMMENT KS #10</p>	<p>RESPONSE KS #10</p>
<p>COST OVERRUNS HAVE ALREADY BEEN TREMENDOUS FOR THIS PROJECT AND HAVE EXCEEDED THE AMOUNT THAT THE RDA AGENCY HAVE BEEN ENTRUSTED WITH TO ESTABLISH A SIMPLE DEWATERING WELL. THE RDA HAS BEEN FUNDING THE WORK NECESSARY TO COMPLETE THIS EIR WITH THE "HORAN LIEN MONEY" WHICH IS SUPPOSE TO BE USED TO STABILIZE THE ABALONE COVE SLIDE. DR. ELIG MAINTAINS THAT THE DEWATERING OF THIS WELL, TO A GREATER DEGREE, WILL HELP TO STABILIZE THE PORTUGUESE BEND SLIDE THE WELL SHOULD NOT ENTIRELY BE FUNDED BY HORAN.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

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COMMENT KS #11	RESPONSE KS #11
<p>1.0 Executive Summary, page v</p> <p>“the City has the principal authority to carry out the proposed project and is the lead agency for the preparation and certification of this EIR.”</p> <p>WHY DIDN'T THE CITY PAY FOR THIS EIR, CONDUCT HEARING FOR THE EIR AND CERTIFY IT? WHY DOESN'T THE CITY DIVIDE THE COST BETWEEN PORTUGUESE BEND AND ABALONE COVE BASED ON BENEFIT ASSESSMENT?</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The proposed project is a RDA project. The City has the primary authority to carry out the project for the RDA. City procedures and guidelines are utilized to present prepare the EIR.</p>
COMMENT KS #12	RESPONSE KS #12
<p>Alternatives</p> <p>THIS EIR IS INCOMPLETE AND NOT ADEQUATE BECAUSE IT FAILED TO ADDRESS THE NEWLY ESTABLISHED WELL WHICH WERE PERMITTED ON THE HON PROPERTY AS BORINGS. THE “BORINGS” WERE CAPPED OFF TO SERVE AS FUTURE DEWATERING WELLS. ONE OR MORE OF THESE WELL SITES IS FAR SUPERIOR TO THE PROJECT SITE AND ALL ALTERNATIVES REVIEWED IN THIS EIR. THIS EIR FAILED TO ADDRESS THE NEW WELLS WHICH WERE INSTALLED BEFORE THIS DRAFT EIR WAS CIRCULATED. IN ADDITION, DR. ELIG HAS WRITTEN MEMOS ON THE NEW WELLS POINTING OUT THAT THE NEW WELLS, ONE IN PARTICULAR, IS A BETTER ALTERNATIVE TO THE MONAHAN WELL. THE WELL DR. ELIG WISHES TO USE AS AN ALTERNATIVE IS FEASIBLE, MEETS THE OBJECTIVES OF THE PROJECT, IS ENVIRONMENTALLY SUPERIOR THAN THE PROPOSED PROJECT BUT THIS EIR FAILED TO CONSIDER IT AS AN ALTERNATIVE.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #9 related to the alternatives to the proposed project.</p>
COMMENT KS #13	RESPONSE KS #13
<p><u>Growth Inducing Impacts of the Proposed Project</u> page vi</p> <p>“...the proposed project consists of improvements to lower the groundwater level in Abalone Cove Landslide area...”</p> <p>THE FACT IS THAT THE CITY/RDA GEOLOGIST MAINTAINS THAT THE GROUND WATER WILL BE LOWERED IN THE PORTUGUESE BEND SLIDE AREA. INFORMATION FROM DR. ELIG'S WORK,</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #9 related to the Dr. Ehlig's report to the RDA.</p>

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<p>MEMOS AND MAPS NEED TO BE CONSIDERED IN THIS EIR.</p>	
<p>COMMENT KS #14</p>	<p>RESPONSE KS #14</p>
<p>"...in order to fully stabilize the Abalone Cove Landslide..."</p> <p>THE CITY/RDA GEOLOGIST REPORTED THAT THE ABALONE SLIDE WAS STABILIZED YEARS AGO.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>
<p>COMMENT KS #15</p>	<p>RESPONSE KS #15</p>
<p>"...growth inducing impacts are not anticipated..."</p> <p>CITY RECORDS INDICATE THAT THE CUMULATIVE IMPACT OF THE SEWERS, WELLS AND DRAINAGE LINING, ETC. WILL OPEN BUILDING FOR VACATE LOTS. THAT'S WHY THE RDA APPROVED SEWER LATERALS FOR EMPTY LOTS... FUTURE BUILDING. THIS PROJECT WITH THE OTHERS WILL DIRECTLY RESULT IN AN INCREASE IN THE LOCALIZED POPULATION. LOW, VERY LOW AND MODERATE INCOME HOUSING NEEDS TO BE ADDRESSED, ESPECIALLY BECAUSE THE AREA IS LOCATED WITH THE BOUNDARY OF THE REDEVELOPMENT AGENCY ESTABLISHED TO CLEAR BLIGHT AND SLUMS.</p>	<p>The proposed project will not be growth inducing. The Draft EIR states the following:</p> <p style="text-align: center;">GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECT</p> <p>The proposed project provides for the conversion of existing monitoring well #LC4 to a dewatering well and the operation of the well unit. The proposed project is one method of several that need to be implemented in order to fully stabilize the Abalone Cove Landslide. Although utility and infrastructure projects can generally be considered growth inducing, due to the fact that the Abalone Cove Well Conversion project in and of itself will not result in the stabilization of the Abalone Cove Landslide, growth inducing impacts are not anticipated. Implementation of the proposed project will not directly result in the increase in a localized population or employment. The project is intended to contribute to the stabilization of the landslide mass in an effort to prevent destruction to existing development within the Abalone Cove Landslide (page 123).</p>
<p>COMMENT KS #16</p>	<p>RESPONSE KS #16</p>
<p>"...effort to prevent destruction to existing development..."</p> <p>THERE IS NO DESTRUCTION TO EXISTING DEVELOPMENT. ALL "DESTRUCTION" WAS MINIMAL AND HAPPENED YEARS AGO. ONE HOUSE WAS RUINED AND HAS NOW BEEN REBUILT ON THE SAME SITE!</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

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COMMENT KS #17	RESPONSE KS #17
<p>General Summary Earth Resources, page viii</p> <p>“No grading activities will be required.”</p> <p>IT IS OBVIOUS THAT GRADING WILL BE REQUIRED FOR THE ACCESS ROAD. THERE IS A TWO FEET DROP FROM THE STEEP ACCESS TRAIL TO THE FIRE ROAD WHICH WILL REQUIRE GRADING. THE ENTIRE ACCESS TRAIL WILL REQUIRE GRADING TO BRING IT INTO SAFETY AND SLOPE REQUIREMENTS OF THE CITY. LEVEL OF SIGNIFICANCE IS HIGH.</p>	<p>Please refer to Response to Comment KS #3 related to the proposed access road.</p>
COMMENT KS #18	RESPONSE KS #18
<p>“...will not result in the disruption, displacement, compaction, or overcovering of soil.”</p> <p>THE ACCESS ROAD HAS SUFFERED COMPACTION OF AT LEAST 10,000 SQUARE FEET OF ENVIRONMENTALLY SENSITIVE MOUNTAIN SIDE WATERSHED AND GNATCATCHER HABITAT BY THE ILLEGAL USE OF VEHICLES ON A TRAIL BY THE CITY/RDA/EIR STAFF WHILE TRYING TO FIGURE OUT IF THE AREA WAS ENVIRONMENTALLY SENSITIVE. ALL ACCESS TO THIS AREA SHOULD BE LIMITED TO WALKING IN TO THE SITE</p>	<p>Please refer to Response to Comment KS #3 related to the proposed access road.</p>
COMMENT KS #19	RESPONSE KS #19
<p>“...will not increase...water erosion of soils...no clearing of existing vegetation will be required...”</p> <p>DUE TO THE RDA/CITY EIR/GEOLOGICAL/EDISON/ ENGINEERING/ACLAD STAFFS ILLEGAL USE OF 4 WHEEL DRIVE VEHICLES TO ACCESS THE AREA IN ANTICIPATION OF THIS PROJECT, VEGETATION WAS ALREADY REMOVED. EROSION OF SOILS HAS ALREADY TAKEN PLACE. THE DAMAGE WILL CONTINUE AND INTENSIFY AS THIS PROJECT CONTINUES. THE COASTAL SAGE SCRUB WAS REMOVED AT THE SITE OF THE WELL. GNATCATCHER HABITAT WILL BE DEVASTATED WITH MUD SLIDES CAUSED BY THE “WASH” WHICH THE CITY/RDA STAFF CREATED WITH THEIR OFF ROAD VEHICLES. THE LACK OF VEGETATION AND STEEPNESS OF THE ROAD IS</p>	<p>Please refer to Response to Comment KS #3 related to the proposed access road.</p>

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<p>SHOWN IS THE FOLLOWING PICTURES:</p> <p>At half way point up the path looking down steep hill.</p> <p><i>[Photograph included in Appendix A of this Response to Comments and Final EIR]</i></p> <p>At half way point on the path looking up the steep path with the well located beyond the trees.</p> <p><i>[Photograph included in Appendix A of this Response to Comments and Final EIR]</i></p>	
<p>COMMENT KS #20</p>	<p>RESPONSE KS #20</p>
<p>“...Will not cause significant changes in deposition or erosion of beach sands, or changes in siltation, deposition, or erosion which may modify the channel of a river or stream or the bed of the ocean...”</p> <p>THE DEWATERING OF KELVIN CANYON, A BLUE LINE STREAM, WILL LEAD TO THE MODIFYING OF THE LAST REMAINING WETLANDS ON THE SOUTH SIDE OF THE PENINSULA. THE ADDITIONAL WATER DUMPED ONTO THE BEACH TRANSPORTED THROUGH THE DEWATERING PIPES WILL MODIFY THE BEACH.</p>	<p>The impacts of the proposed project related to erosion of beach sands, or changes in siltation, deposition, or erosion related to the ocean waters are discussed in the Section 5.0 Environmental Analysis - Water Resources. Mitigation Measure 5 was provided to reduce potential impacts to a less than significant level. Mitigation Measure 5 states:</p> <p style="margin-left: 40px;">5. Prior to construction, project specifications shall be established to monitor the velocity of water at the beach discharge after implementation of the project. Project dewatering shall be temporarily halted and installation of erosion control measures (natural rock energy dissipater) shall occur should the Director of Planning, Building, and Code Enforcement determine that erosive velocities occurred. The installation of the erosion control measures, if required, shall be approved by the Director of Public Works. Compliance with this measure shall be verified by the Director of Public Works.</p>
<p>COMMENT KS #21</p>	<p>RESPONSE KS #21</p>
<p>“...lower the groundwater level and help to reduce the driving forces in the active Abalone Cove Landslide Area.”</p> <p>DEWATER KELVIN CANYON SPRING BY PUMPING THE MONAHAN WELL OR THE HON WELL WILL IMPACT THE GROUND WATER LEVEL IN THE PORTUGUESE BEND SLIDE. WILL THE LOWERING OF GROUND WATER REDUCE THE DRIVING</p>	<p>Please refer to Response to Comment KS #9 related to Dr. Ehlig’s report to the RDA. Dr. Elig’s report notes the following:</p> <p style="margin-left: 40px;">“...either well will remove water that would other wise flow downhill at Kelvin Canyon and hence into the landslides.”</p>

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<p>FORCES IN THE PORTUGUESE BEND SLIDE? THIS IMPACT NEEDS TO BE CONSIDERED. THE ABALONE COVE SLIDE IS NOT "ACTIVE."</p>	<p>Reduction of the "driving force" in either landslide would not be considered a significant adverse impact.</p>
<p>COMMENT KS #22</p>	<p>RESPONSE KS #22</p>
<p>Air, page ix, "will not result in...deterioration of...air quality."</p> <p>ENDING THE 1,000-2,000 FEET LONG FLOW OF KELVIN CANYON SPRING WATER WILL END THE IONIZATION OF THE AIR, THUS INCREASING THE TEMPERATURE AND REDUCING AIR QUALITY.</p>	<p>The elimination of water flow for 1,000 to 2,000 feet in Kelvin Canyon was determined not to be a significant impact based on the criteria established in the environmental analysis for this project.</p> <p>The analysis and criteria have been transmitted to all appropriate State and local agencies with jurisdiction and expertise related to air quality impacts. No correspondence has been received from these agencies.</p>
<p>COMMENT KS #23</p>	<p>RESPONSE KS #23</p>
<p>"...will not alter air movement, moisture, temperature, or result in any changes in climate on a local...basis."</p> <p>DEWATERING OF KELVIN CANYON SPRING WILL CAUSE THE AREA TO BECOME A DUST BOWL, MUCH LIKE THE MIDWEST BECAUSE OF TOO MUCH PUMPING OF GROUND WATER. THE CANYON AREA AT THE SPRING DOWN TO AND INCLUDING MY PROPERTY WILL DRY UP. THE TREES WILL DIE. THE CLIMATE WILL CHANGE FROM A COOL, DAMP WETLANDS INTO A DRY, HOT DUST BOWL. MITIGATION MEASURES MUST BE EMPLOYED: CONTINUE WATERING TREES.</p>	<p>Please refer to Response to Comment KS #22 related to the related to air quality.</p> <p>Kelvin Canyon is not anticipated to become a "dust bowl." Areas of the canyon above and below the spring do not exhibit a "dust bowl" like condition (site visits VISTA staff).</p> <p>The proposed project will not have a significant impact as defined by CEQA, the State CEQA Guidelines, and Local CEQA Guidelines related to trees in the vicinity of the proposed project.</p>
<p>COMMENT KS #24</p>	<p>RESPONSE KS #24</p>
<p>Water Resources, page ix</p> <p>"...will not result in the change of currents or direction of water movements in marine or fresh waters." ETC.</p> <p>DRYING UP OF KELVIN CANYON WILL END THE DIRECTION OF THE SPRING WATER FLOW WHICH CERTAINLY CONSTITUTES A CHANGE.</p> <p>THE ILLEGAL ROAD HAS ALREADY MODIFIED THE EXISTING ABSORPTION RATES, DRAINAGE PATTERNS AND INCREASE IMPERVIOUS SURFACES IN THE AREA. WITH A SIMILAR RAINSTORM OF JANUARY 3, 1995, DUMPING 7-12 INCHES OF RAIN IN A FEW HOURS, THE PROPOSED</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #3 related to the access road.</p>

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<p>ROAD HAS THE POTENTIAL TO DELIVER TREMENDOUS AMOUNTS OF SWIFT RUNNING WATER AND MUD INTO MY BACKYARD POTENTIALLY CAUSING UNBELIEVABLE DAMAGE TO LIFE AND PROPERTY. THIS PROPOSED PROJECT, WITH THE ACCESS ROAD, WILL RESULT IN ALTERATIONS TO THE COURSE AND FLOW OF FLOOD WATERS AND COULD CAUSE FLOODING OF GNATCATCHER HABITAT AND MY BACKYARD.</p>	
<p>COMMENT KS #25</p>	<p>RESPONSE KS #25</p>
<p>THE PROPOSED PROJECT WILL OUTLET INTO THE OCEAN WITH OTHER SEPTIC TANK POLLUTED WATER. THE SEPTIC TANK POLLUTED WATER FROM ALL DEWATERING WELLS WITHIN RDA, INCLUDING KLONDIKE, PORTUGUESE BEND, ACLAD AND THE HORAN WELLS SHOULD HAVE THE PROPER WATER TESTING AND PERMITS. EVEN WITH SEWERS INSTALLED WITHIN RDA, THE SEWAGE FROM ROLLING HILLS WILL CONTINUE TO ENTER THE DEWATERING WELLS IN PORTUGUESE BEND AND KLONDIKE AND IS BEING PUMPED INTO THE OCEAN.</p> <p>THE ENTIRE DEWATERING SYSTEMS WITHIN THE RDA WHICH DUMPS INTO OUR OCEAN ARE FULL OF CHEMICALS FROM MAN MADE FERTILIZERS, POLLUTANTS FROM INSECT SPRAYS, MOTOR OIL AUTO LEAKS, BRACKISH WATER, SEWAGE, ETC. PEOPLE, ESPECIALLY CHILDREN, ARE NOW EXPOSED TO THE POLLUTED WATER WHICH CURRENTLY RUNS THROUGH ALL OF THE DEWATERING PIPES AND SUBJECTS PEOPLE TO POLLUTED WATER AT THE OUTFLOW. THE MERE FACT THAT THE SPRING WATER WILL BE COMBINED WITH THIS POLLUTED WATER, OPENS THIS EIR UP TO EVALUATING THE POLLUTED WATER HAZARDS WITHIN THE ENTIRE RDA, INCLUDING THE OUTFLOW PIPE AT THE BEACH.</p>	<p>The proposed project has the potential to impact ocean waters by the discharge or polluted water. Mitigation Measures 5, 6, and 7 have been provided to mitigate any potential impact to a less than significant level. Mitigation Measures 5, 6, and 7 provide:</p> <ol style="list-style-type: none"> 5. Prior to construction, project specifications shall be established to monitor the velocity of water at the beach discharge after implementation of the project. Project dewatering shall be temporarily halted and installation of erosion control measures (natural rock energy dissipater) shall occur should the Director of Planning, Building, and Code Enforcement determine that erosive velocities occurred. The installation of the erosion control measures, if required, shall be approved by the Director of Public Works. Compliance with this measure shall be verified by the Director of Public Works. 6. Prior to construction, project specifications shall be established requiring notification to United States Army Corp of Engineers (COE) and California Department of Fish and Game (CDF&G) and approval from these agencies to mitigate potential impacts as a result of the project to a level of insignificance. <p style="text-align: right;"><i>The notification shall include the findings of surveys accomplished</i></p>

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	<p><i>within a reasonable time of the notification for the following:</i></p> <ol style="list-style-type: none"> 1. <i>Palos Verdes blue butterfly;</i> 2. <i>Palos Verdes blue butterfly foodplants;</i> 3. <i>Pacific pocket mouse; and</i> 4. <i>California gnatcatchers.</i> <p>Compliance with this measure shall be verified by the Director of Public Works.</p> <p>7. Prior to construction, project specifications shall be established requiring notification to California Regional Water Quality Control Board (CRWQCB) and approval from this agency to mitigate any potential impacts as a result of the project to a level of insignificance. Compliance with this measure shall be verified by the Director of Public Works.</p>
<p>COMMENT KS #26</p>	<p>RESPONSE KS #26</p>
<p>Page x Water Resources</p> <p>“The proposed project may result in a decrease in the amount of surface water currently discharged from the Kelvin Canyon spring located in the bottom of Kelvin Canyon. Kelvin Canyon is designated as a blueline stream on the U.S.G.S. topographical map. Although no impact related to water is anticipated, impacts may occur to plant life and animal life due to the reduction of surface water in the stream.”</p> <p>THE PANEL OF EXPERTS, INCLUDING DR. ELIG, BELIEVE THAT THE DEWATERING OF A WELL IN THE VICINITY OF THE KELVIN CANYON SPRING WILL DEplete OR SLOW DOWN THE WELL WATER. ALL INFORMATION GATHERED DURING PANEL MEETINGS INDICATED THAT THE SPRING COULD RUN DRY. THE DEPLETION OF A BLUE LINE STREAM WILL CREATE A TREMENDOUS IMPACT ON THE PLANT LIFE AND ANIMAL LIFE AND MUST BE ADDRESSED. THIS IS A WETLANDS. MAJOR ADVERSE IMPACTS MUST BE ADDRESSED. MITIGATION MEASURES ARE AVAILABLE, I.E.:</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #9 related to the report to the RDA from Dr. Elig.</p>

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<p>PROVIDING WATER BOWLS EVERY 100' OVER THE 2,000 FEET OF WETLANDS. THE WILLOWS, WALNUTS AND ALL NATIVE TREES AND PLANTS NEED TO BE WATERED. THE PEPPER TREES AND ALL DEEP ROOT TREES BELOW THE WELL NEED TO BE PROTECTED BY HAVING A BIOLOGIST TYPE SPECIALIST TO EVALUATE WHAT THE LOWEST WATER TABLE DEPTH IS ALLOWABLE TO MAINTAIN THESE TREES.</p>	
<p>COMMENT KS #27</p>	<p>RESPONSE KS #27</p>
<p>“The proposed project may alter the direction or rate of flow of groundwater in the area. Groundwater is not a(n)... aquifer recharge in this location.”</p> <p>DR. ELIG’S MEMO TO THE CITY WHICH WAS DISTRIBUTED TO CITY COUNCIL AND/OR RDA AGENCY MEMBERS, WHICH SHOULD BE CONSIDERED IN THIS EIR, CLEARLY EXPLAINS HOW THIS LOCATION AND THE LOCATION OF THE NEW WELL ON THE HON PROPERTY ACTS AS AN AQUIFER RECHARGE TO KELVIN CANYON.</p> <p>THE DEWATERING OF THIS WELL WILL SLOW DOWN OR DEplete THE KELVIN CANYON SPRING WHICH DR. ELIG’S RESEARCH DISCLOSED THAT THE SPRING RECHARGES THE PORTUGUESE BEND AND THE ABALONE COVE SLIDES. THIS RESEARCH SHOULD BECOME PART OF THIS EIR OR THIS DOCUMENT IS FLAWED AND INCOMPLETE. MITIGATION MEASURES MUST BE DISCUSSED BEFORE THIS PROJECTS WHICH WILL ADVERSELY EFFECT THE WETLANDS MOVES FORWARD.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #9 related to the report to the RDA from Dr. Elig.</p>
<p>COMMENT KS #28</p>	<p>RESPONSE KS #28</p>
<p>Plant Life, Animal Life, page xi, Biological Resources, page xvi</p> <p>“...will not result in the changes in the diversity of species...new species or animals...”</p> <p>WITH THE ILLEGAL INSTALLATION OF THE MONAHAN MONITORING WELL, A GNATCATCHER HABITAT, WITH GNATCATCHERS, WAS DEMOLISHED. IN PLACE OF THE COASTAL SAGE, A FOREIGN LICORICE TYPE WEED HAS FLOURISHED. THIS WEED WAS TRANSPORTED BY CONSTRUCTION VEHICLES FROM BELOW THE</p>	<p>There is no public record of an “illegal” establishment of the existing monitoring well site.</p> <p>The existing vegetation in the vicinity of the monitoring well is “Grassland” as depicted on Exhibit 16 Aerial Photograph and Plant Communities (page 52).</p> <p>Please refer to the Errata section of this Response to Comments and Final EIR. The EIR has been revised related to biological impacts.</p> <p>The biological analysis states:</p>

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SITE. BECAUSE OF THIS PROPOSED PROJECT, ADDITIONAL GNATCATCHER HABITAT LOCATED MID WAY DOWN THE STEEP ROAD DUE WEST NEEDS TO BE PROTECTED FROM FLOODING, FIRE, INTRODUCTION OF DOMESTIC ANIMALS AND PEOPLE USING THE ROAD. IN ADDITION, THE CACTUS WREN HABITAT EAST OF THE ROAD MUST BE PROTECTED. THIS EIR IS INCOMPLETE WITHOUT ADDRESSING IMPACT AND MITIGATION MEASURES.

PLACING SEVERAL POWER POLES DOWN THE STEEP WALL AND THE WET FLOOR OF THE CANYON THROUGH A THICK GNATCATCHER HABITAT WOULD CREATE A SIGNIFICANT IMPACT WHICH THE DESTRUCTION OF PLANT AND ANIMAL LIFE AND MUST BE MITIGATED.

LEVEL OF SIGNIFICANCE

No impacts on significant biological resources are anticipated for the construction of all components (well, discharge pipeline, access, and power poles and lines) of the dewatering well system.

The conversion of the existing monitoring well to operate as a dewatering well will not have an impact on plant or animal species diversity or sensitive species.

No impacts on significant biological resources are anticipated from the construction and equipping of the monitoring well to operate as a dewatering well.

No impacts on significant biological resources are anticipated from the construction and use of the access road.

No biological resource impact is anticipated from the inspection and maintenance of the dewatering well

The proposed project will have an impact on approximately 80 64 square feet Coastal sage scrub habitat by the construction of power poles. This small direct loss of this habitat is not considered a significant impact.

The operation of the dewatering well system will not have an impact on sensitive plant species.

Implementation of the proposed project would directly or indirectly have an impact on all the animal species on-site in the vicinity of the proposed project. This is not considered a significant impact.

The proposed project will have an impact on biological resources in the project vicinity. Wildlife in the area will be subject to higher noise levels during the construction period, which may cause some species to leave the area, at least temporarily. This is not considered a significant impact the impact is of a short duration and relatively low intensity.

The construction of the discharge pipeline will

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	<p>have an impact on existing biological resources. Mitigation Measure 2 has been provided to reduce the impact to a less than significant level.</p> <p>The proposed project could potentially have an impact on the California gnatcatchers. The potential harassment of the California gnatcatcher during construction of the project is considered a significant impact. The impact is mitigated to a less than significant level by Mitigation Measure 3.</p> <p>The potential harassment of the San Diego Cactus wren during construction of the project is considered a potentially significant impact. The impact is mitigated to a less than significant level by Mitigation Measure 3.</p> <p>The operation of the dewatering well system will have an impact on the Open Channel Habitat/Stream Bed With Riparian Elements habitat located in Kelvin Canyon. The proposed project will eliminate the spring and perennial water in the mid-section of Kelvin canyon. This is considered a significant unavoidable adverse impact on biological resources.</p> <p>The proposed project in conjunction with other past, present, and reasonably foreseeable future projects has the potential to contribute to a cumulative impact on biological resources. The projects incremental contribution to these impacts is not considered significant except for impacts to the open channel habitat/stream bed with riparian element's habitat located in Kelvin Canyon. The impact to this habitat is an unavoidable adverse project-specific impact on biological resources (pages 66 -67 revised).</p>
<p>COMMENT KS #29</p>	<p>RESPONSE KS #29</p>
<p>"...or result in a barrier to the migration or movement of animals..."</p> <p>THE NEW, WIDENED ROAD WILL CLEARLY BE A THREAT TO WILDLIFE AS THEY CAN NO LONGER RELY ON THE BRUSH FOR PROTECTION. THE</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #3 related to the access road and Response to Comment KS #28 related to the related to biological resources.</p>

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<p>RESULTING DRIED UP SPRING BED WILL HAVE AN ADVERSE IMPACT ON ANIMAL AND PLANT LIFE. THE NEW ROAD WILL DIVIDE THE HABITAT. THE LENGTH AND GRADE OF THE ROADS NEEDS EVALUATION AND SAFETY MEASURES INSTALLED. HOW MANY TONS OF GRAVEL WILL BE USED? HOW WILL IT BE DELIVERED AND SPREAD? PLEASE REMEMBER THAT CHARLIE ABBOTT RECOUNTED A STORY ABOUT A TRACTOR OPERATOR WHO COULD HAVE BEEN SEVERELY INJURED OR COULD HAVE DIED IF HIS TRACTOR HAD ROLLED WHILE GOING DOWN A STEEP TRAIL TO THE OCEAN AT SACRED COVE. TOO MANY RISKS HAVE BEEN TAKEN IN THE NAME OF "STOPPING THE SLIDE." THIS ROAD IS NOT UP TO CODE AND IS VERY DANGEROUS AND MUST BE EVALUATED AND MITIGATED.</p> <p>LOWERING THE GROUND WATER WILL IMPACT ALL DEEP ROOTED TREES. NO ONE IS MONITORING THE IMPACT AND TREMENDOUS AMOUNT OF WATER WHICH IS NOW BEING TAKEN OUT OF THE GROUND BY ACLAD, KLONDIKE, RDA IN PORTUGUESE BEND AND RDA IN ABALONE COVE SLIDE AREA.</p>	
<p>COMMENT KS #30</p>	<p>RESPONSE KS #30</p>
<p>Land Use, Page xii. THE PIPE OUTLET IS WITHIN THE COASTAL ZONE.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please note the entire proposed project is within the Coastal Zone.</p>
<p>COMMENT KS #31</p>	<p>RESPONSE KS #31</p>
<p>Risk of Upset</p> <p>THE PROPOSED PLAN CREATES AN INTERFERENCE WITH EMERGENCY RESPONSE AS THE SITE WHERE ELECTRICAL LINES ARE PROPOSED, DIRECTLY BELOW BURRELL, DEL CERRO PARK AND ISLAND VIEW, WILL REMAIN INACCESSIBLE TO FIRE TRUCKS. THE ALTERNATIVE WELL SITE WHICH DR. ELIG SUGGESTED BUT IS NOT COVERED IN THIS EIR IS LOCATED ON A "FIRE ROAD" AND PROVIDES A MUCH SAFER AND ACCESSIBLE SITE.</p> <p>CHANGING THE SITE TO THE NEW HON WELL WHICH DR. ELIG PREFERS AS AN ALTERNATIVE BUT WAS NOT CONSIDERED IN THIS EIR WILL END</p>	<p>The proposed project will not interfere with any emergence access plan.</p> <p>Please refer to Response to Comment KS #9 related to the report to the RDA prepared by Dr. Ehlig.</p> <p>The "Alternative Well Site" is evaluated in the RREIR as the Hon Well Alternative. The RREIR evaluated if the Hon Well Alternative would reduce or eliminate significant impacts of the proposed project.</p>

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<p>THE FIRE THREAT TO DEL CERRO, ISLAND VIEW AND BURRELL.</p>	
<p>COMMENT KS #32</p>	<p>RESPONSE KS #32</p>
<p>Transportation/Circulation</p> <p>DUE TO THE FACT THAT VEHICULAR TRAFFIC WILL BE GENERATED FOR THE MAINTENANCE AND READING METERS FOR THE WELL AND THIS TRAFFIC WILL USE A PRIVATE DRIVEWAY TO GAIN ACCESS ONTO A DIRT ROAD WHICH CONNECTS TO THE 4 WHEEL DRIVE ROAD CREATED BY RDA/CITY STAFFERS BEFORE COMPLETION OF THIS EIR, THERE WILL BE A CONSIDERABLE INCREASE IN TRAFFIC ON THIS ROAD SINCE NO VEHICULAR TRAFFIC IS ALLOWED NOW. TRANSITING A PRIVATE DRIVEWAY ALSO WOULD BE CONSIDERED AS AN ADVERSE IMPACT, ESPECIALLY IF IT WERE YOUR PRIVATE DRIVEWAY. VANDERLIP IS A PRIVATE DRIVEWAY-NOT A ROAD OR DIVE.</p> <p>HOW WILL THE VEHICLES GAINING ACCESS TO THE SITE CROSS OVER THE SPRING IN AN ENVIRONMENTALLY SENSITIVE WAY? PERSONS WHO NEED TO VISIT THE SITE SHOULD PARK THEIR VEHICLES ON NARCISSA AND USE THE HORSE TRAIL TO WALK TO THE SITE. A PARKING SPACE SHOULD BE PROVIDED FOR THEM. VEHICLES USING THE DIRT ROAD WHICH WAS A NARROW FOOT AND HORSE TRAIL WILL CAUSE GREAT DANGER TO HIKERS AND RIDERS. THE VEHICLE WILL NOT BE ABLE TO STOP WHILE GOING DOWNHILL WITHOUT SKIDDING. UPHILL THE VEHICLE WILL NOT BE ABLE TO STOP AND START ON SUCH A STEEP, CLIFF LIKE ROADWAY.</p>	<p>The Draft EIR describes the operational characteristics of the proposed project as follows:</p> <p><u>Phase II - Dewatering Well System - Operation</u></p> <p>Phase II is the operation of the dewatering well system. Phase II does not involve construction. The following describes the anticipated long-term operational characteristics of each component of the proposed project.</p> <p>Dewatering Well System (Well, Discharge Lines, Power Poles and Power Lines, and Access Road)</p> <p>WELL</p> <p>The well will require monthly maintenance. Each month the well will be checked to evaluate performance. The meter will be read to determine the volume of water pumped.</p> <p>DISCHARGE PIPELINE</p> <p>Maintenance of the discharge line will be required periodically.</p> <p>POWER POLES AND LINES</p> <p>No maintenance is anticipated to be necessary.</p> <p>ACCESS ROAD</p> <p>Maintenance of the access road will be required periodically (pages 17-18).</p>
<p>COMMENT KS #33</p>	<p>RESPONSE KS #33</p>
<p>Utilities, page xiv</p> <p>SOUTHERN CALIFORNIA EDISON COMPANY WROTE A LETTER OBJECTING TO THE UTILITY</p>	<p>Please refer to Appendix D of this Response to Comments and Final EIR for the letter from the Southern California Edison Company and map.</p>

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<p>POLES GOING OVER, DOWN AND THROUGH KELVIN CANYON. THIS LETTER AND A MAP WAS SUBMITTED TO THE RDA AND SHOULD BE A PART OF THIS RECORD. THE EXHIBITS DO NOT CLEARLY SHOW POLE LOCATIONS.</p>	<p>Additionally, Please refer to Appendix D of this Response to Comments and Final EIR for correspondence from the City Public Works Department that reflects the Edison Company's approval of the power poles and lines as proposed.</p> <p>Additionally, Exhibit 8 in the EIR indicates the location of all power poles and lines in cross hatching. The four (4) individual poles will be located in the cross hatched area</p>
<p>COMMENT KS #34</p>	<p>RESPONSE KS #34</p>
<p>Recreation</p> <p>THE WELL IS LOCATED ON THE FAMOUS RATTLE SNAKE TRAIL USED FOR A VARIETY OF RECREATIONAL ACTIVITIES INCLUDING HORSEBACK RIDING, HIKING, MOUNTAIN CLIMBING, AND PARASAILING.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>
<p>COMMENT KS #35</p>	<p>RESPONSE KS #35</p>
<p>Cultural Resources</p> <p>THERE IS A RUIN OF A WORLD WAR II GUNNERY AND OUTLOOK STATION WHICH WAS USED TO SPOT JAPANESE SUBS AND WARSHIPS OFF OF OUR COAST IN WW II. THIS HISTORIC STATION IS LOCATED 200' SOUTH OF THE WELL SITE AND HAS BEEN FURTHER VANDALIZED AFTER THE WELL AND ROAD WAS INSTALLED. THIS SITE MUST BE PROTECTED BEFORE FURTHER HARM OCCURS.</p> <p>THE WELL SITS JUST ABOVE THE HEAD OF AN INDIAN MIDDEN. WITH THE PROJECT INCLUDING A ROAD AND ELECTRICAL POWER POLES, THE IMPACT TO THE MIDDEN MUST BE EVALUATED AND MITIGATED. THE ACTUAL MIDDEN IS LOCATED ON RATTLE SNAKE TRAIL JUST ABOVE THE SPRING IN THE CANYON. FURTHER DISTURBANCE OF THE SITE AND THE DIGGING OF POWER POLE HOLES AND INSTALLATION AT THE MIDDEN SITE WOULD BE DEVASTATING. IT APPEARS, BUT IS NOT CLEAR BY THE MAP, THAT THE POLES ARE TO BE PLACED ON RATTLE SNAKE TRAIL. MITIGATION MEASURES ARE REQUIRED.</p> <p>THE NEW HON WELL LOCATED ON THE EAST SIDE OF KELVIN CANYON WHICH DR. ELIG WANTS TO DEWATER INSTEAD OF THIS SITE WOULD NOT HAVE AN IMPACT ON THE INDIAN MIDDEN, THE</p>	<p>A report was prepared by William H. Breece, Ph.D. entitled, "Results of a Record Search and Archaeological Survey of Three Projects in Rancho Palos Verdes, California." The report is included in the Draft EIR as Appendix. The report indicates that the proposed project will not have an impact on archaeological resources.</p> <p>The report included a record search conducted at the Regional Information Office located at the University of California, Los Angeles (UCLA) on October 5, 1995. The record search revealed that the area in the vicinity of the dewatering well system has been previously surveyed (Brown 1991). The results of that survey did not indicate that any cultural resource material was located on the proposed project site. The results of the previous survey (Brown 1991) were confirmed by a systematic walkover (Breece 1995).</p> <p>Please refer to response to comment KS #9 related Alternative Site 2.</p> <p>Please refer to response to comment KS #1 related to impacts related to biological resources.</p>

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<p>WORLD WAR II GUNNERY RUIN, NOR CREATE THE DEVASTATION TO A GNATCATCHER HABITAT BY SINKING POWER POLES THOUGHOUT WETLANDS.</p>	
<p>COMMENT KS #36</p>	<p>RESPONSE KS #36</p>
<p>Aesthetics</p> <p>ASK KEN BURRELL, ISLAND VIEW RIM RESIDENTS AND THOSE USING DEL CERRO PARK HOW THEY WILL ENJOY SEEING NEWLY PLACED POWER POLES DIRECTLY BELOW THEM. UTILITIES, BY CODE IN OUR CITY, ARE TO BE PLACED UNDERGROUND.</p> <p>“The proposed project will have an impact on the existing visual environment on the westerly side of Kelvin Canyon by the construction of the discharge pipeline. This is not considered a significant aesthetic impact.”</p> <p>HAVING AN ABOVE GROUND DISCHARGE PIPE IN A STABLE AREA FAR ABOVE THE FORMER ACTIVE SIDE AREA BRINGS BLIGHT TO THIS AREA AS NOTED IN THE EIR WHICH WAS CERTIFIED IN 1984 FOR THE CURRENT RDA. ABOVE GROUND UTILITIES HAVE A SUBSTANTIAL IMPACT AS SHOWN IN THIS PICTURE WHICH WAS TAKEN WITHIN FEET OF THE PROPOSE WELL. HAS CONSTRUCTION STARTED BEFORE THIS EIR IS CERTIFIED? WHY IS THIS UGLY PIPE ON SITE ON SEPTEMBER 28, 1996?</p> <p><i>[Photograph included in Appendix A of this Response to Comments and Final EIR]</i></p> <p>NOT ADHERING TO ESTABLISHED CITY CODE STANDARDS, IE NEW PIPES AND UTILITIES INSTALLED ABOVE GROUND, WILL NOT BE ACCEPTABLE NOR CAN IT BE JUSTIFIED ON THE PROPERTY OF MY IMMEDIATE NEIGHBOR. OVERHEAD UTILITIES HAVE BEEN A HEALTH AND SAFETY ISSUE WITHIN OUR CITY. FOR YEARS HOW CAN WE REQUIRE NEW CONSTRUCTION TO INSTALL UTILITIES UNDERGROUND BUT ALLOW THOUSANDS OF FEET OF ELECTRICAL WIRE ON 5 POLES DIRECTLY BELOW ISLAND VIEW & BURRELL, IN THE HIGHEST FIRE HAZARD AREA OF OUR CITY, TO BE INSTALLED OVERHEAD? THIS IS A STABLE AREA AND DOES NOT WARRANT THE</p>	<p>The aesthetic impacts of the proposed project are discussed in detail on pages 31 - 43 of the Draft EIR. The Draft EIR concluded that:</p> <p style="padding-left: 40px;">The power poles and lines will have an impact on the existing visual environment. This is considered a significant unavoidable aesthetic impact.</p> <p>Should the RDA Board desire to approve the proposed project they will be required to make all appropriate findings in accordance with sections 15092 and 15093 of the State CEQA Guidelines.</p> <p>The impact of the power poles and lines and the discharge pipeline was based on the location as show in the Project Description section of the Draft EIR.</p> <p>No construction has commenced on the proposed project (personal comm. Mr. Dean E. Allison, October 1996).</p> <p>RDA projects are not subject to City codes that require new construction to provide underground utilities.</p> <p>Please refer to Response to Comment KS #4 related to fire protection.</p>

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<p>BLIGHT. THE ABOVE GROUND PIPES AND UTILITIES HAVE BEEN ACCEPTED IN THE "ACTIVE" SLIDE AREA AND CAN BE JUSTIFIED THERE BUT NOT ON STABLE LAND.</p>	
<p>COMMENT KS #37</p>	<p>RESPONSE KS #37</p>
<p>Page xxv Biological Resources</p> <p>KELVIN CANYON SPRING IS LOCATED CLOSE TO THE HIGH POINT AND ABOVE THE MID POINT IN THE CANYON. JUST BELOW RATTLESNAKE TRAIL. KELVIN EXTENDS DOWN TO SWEETBAY. PUMPING IT DRY OR SLOWING DOWN THE RATE OF FLOW MUST AND CAN BE MITIGATED BY U.S. FISH & GAME APPROVED WATERING BOWLS NOW IN USE IN OTHER LOCATION. IN ADDITION, CREATIVE WATER SUPPLIES NEED TO BE MADE AVAILABLE FOR THE WILLOWS, WALNUTS AND ALL NATIVE TREES AND PLANTS THAT RELY ON THE SPRING.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>
<p>COMMENT KS #38</p>	<p>RESPONSE KS #38</p>
<p>ALTERNATIVE SUMMARY MATRIX, page xxvi</p> <p>THE ALTERNATIVE TO THIS "PROJECT" OF PLACING A DEWATERING WELL IN A MORE ACCESSIBLE AREA HAS BEEN SUGGESTED BY DR. ELIG. THIS DRAFT HAS FAILED TO CONSIDER THE MOST COST EFFECTIVE, ENVIRONMENTAL SUPERIOR, ALTERNATIVE NOTED BY DR. ELIG. THE MONITORING WELL ON HON'S PROPERTY IS JUST EAST OF KELVIN CANYON, IS LOCATED ON A FIRE ROAD NOTED AS "CRENSHAW" ON THE LOCAL EXHIBIT, EXH 2, AND HAS POWER CLOSE BY. THE HON WELL, ALREADY IN PLACE, AVOIDS MANY SIGNIFICANT ENVIRONMENTAL EFFECTS AND FIRE HAZARDS. THE DISCHARGE PIPE COULD BE PLACED ALONG AN ALREADY ESTABLISHED FOOT TRAIL DOWN TO VANDERLIP DRIVEWAY. WATER BOWLS WOULD BE PROVIDED FOR WILDLIFE.</p> <p>NO GNATCATCHER HABITAT WILL BE EFFECTED WITH HON'S WELL.</p> <p>THE CITY SHOULD HAVE SUPPLIED VISTA WITH THIS INFORMATION AND IT MUST BE CONSIDERED IN THE EIR OR THE EIR WILL NOT BE</p>	<p>Please refer to Response to Comment KS #9 related to alternatives.</p>

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ADEQUATE AND COMPLETE.	
COMMENT KS #39	RESPONSE KS #39
<p>3.0 Project Description, page 17</p> <p>Access Road VANDERLIP DRIVEWAY IS A PRIVATE DRIVEWAY. PLACING GRAVEL JUST ABOVE THE ENTRANCE TO THE TRAIL WOULD CREATE A MESS ON OUR DRIVEWAY WHEN THE RAINS COME. THE WATER DEPARTMENT USED GRAVEL MANY YEARS AGO AND IT ALL WASHED ONTO OUR DRIVEWAY AND DESTROYED THE SURFACE. FOR USE OF THE PRIVATE DRIVEWAY, THE PROJECT SHOULD RESURFACED THE DRIVEWAY IN RETURN FOR ITS USE. THE PROJECT NEEDS TO ENSURE THAT THEIR GRAVEL IS NOT CARRIED ONTO THE DRIVEWAY BY TIRES FROM THEIR VEHICLES OR THE RAIN. MUD TRACKS LEFT ON THE DRIVEWAY FROM OFFROADING IS OFFENSIVE AND UNSIGHTLY.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Vanderlip Drive is a private road.</p>
COMMENT KS #40	RESPONSE KS #40
<p>page 18. Power poles and lines need maintenance.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The RDA Staff is presently discussing the installation of the power poles and lines with Southern California Edison (SCE). SCE will be responsible for all installation and maintenance of the poles and lines from Crenshaw Boulevard to the well. Annual inspection and maintenance is presently anticipated.</p> <p>Please refer to Response to Comment KS #33 related to the location of power poles and power lines.</p>
COMMENT KS #41	RESPONSE KS #41
<p>page 19. Approval of Easement. HAVING AN EASEMENT GRANTED TO A REDEVELOPMENT AGENT SHOW UP ON THE LEGAL TO ONES PROPERTY IS THE KISS OF DEATH WHEN TRYING TO REFINANCE A HONE LOAN. IN ADDITION, THE CITY SHOULD BE GRANTED ALL EASEMENT BECAUSE THEY WILL BE AROUND LONGER THAN RDA.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

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COMMENT KS #43	RESPONSE KS #43
<p>page 21 State Agencies: CAL WATER RESOURCES BOARD SHOULD BE ADDED.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The NOP/IS and NOC and Draft EIR were circulated to the State of California Department of Water Resources and the Regional Water Quality Control Board - Los Angeles Region. Neither the State Department or the Regional Board indicated that they would have permit authority related to the proposed project.</p> <p>Mitigation Measure 7 requires notification and approval as follows:</p> <p style="margin-left: 40px;">7. Prior to construction, project specifications shall be established requiring notification to California Regional Water Quality Control Board (CRWQCB) and approval from this agency to mitigate any potential impacts as a result of the project to a level of insignificance. Compliance with this measure shall be verified by the Director of Public Works.</p>
COMMENT KS #44	RESPONSE KS #44
<p>property owner: KATHY SNELL, OWNER OF WATER RIGHTS</p>	<p>Please refer to Response to Comment KS #1 related to water rights.</p>
COMMENT KS #45	RESPONSE KS #45
<p>page 23 VANDERLIP DRIVEWAY IS A PRIVATE DRIVEWAY NOT A ROAD</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #39 related to Vanderlip Drive.</p>
COMMENT KS #45	RESPONSE KS #45
<p>"...Steep rugged slopes..." IS THE DESCRIPTION OF THE ACCESS ROAD. THIS CAN NOT BE A LEGAL ROAD UNDER CITY CODE AND SAFETY STANDARDS?</p> <p>"...the project is located within the central portion of the RPV RDA Area..."</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The proposed project consists of several components. The dewatering well is located in the northern portion of the RDA area. The overall project is considered to be located in the central portion of the RDA area by staff.</p>

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<p>THE PROJECT IS LOCATED AT THE MOST NORTHERN POINT, ALMOST OUTSIDE OF RDA.</p> <p>THE PROPOSED SITE IS NOT LOCATED WITH THE ABALONE COVE LANDSLIDE. MY LAND IS NOT SLIDING AND THE SITE IS FURTHER NORTH, FAR AWAY FROM THE SLIDE.</p>	
<p>COMMENT KS #46</p>	<p>RESPONSE KS #46</p>
<p>page 24 "Rancho Palos Verdes Drive.." SHOULD BE PALOS VERDES DRIVE...</p>	<p>Please refer to the Errata section of this Response to Comments and Final EIR for the following revision:</p> <p style="text-align: center;">"...Rancho Palos Verdes Drive..." (Page 24).</p>
<p>COMMENT KS #47</p>	<p>RESPONSE KS #47</p>
<p>page 25 "Vanderlip Road" VANDERLIP DRIVEWAY, "Sweetbay Drive" S/B: ROAD</p>	<p>Please refer to Response to Comment KS #39 related to Vanderlip Drive. Sweetbay Drive is as depicted on City maps.</p>
<p>COMMENT KS #48</p>	<p>RESPONSE KS #48</p>
<p>page 26 GALLON PER MINUTE WAS AVAILABLE AND SHOULD BE INCLUDED.</p>	<p>The RDA installed a weir at the spring in Kelvin Canyon. No measurements were available at the time that the Draft EIR was prepared.</p>
<p>COMMENT KS #49</p>	<p>RESPONSE KS #49</p>
<p>page 30 THIS EIR NEEDS TO ALSO ANALYZE EFFECTS OF SLOWED DOWN WATER IN KELVIN CANYON DUE TO THIS PROJECT. THOSE RESULTS MAY BE THE WORST CASE</p>	<p>The proposed project will eliminate the perennial source of water in Kelvin Canyon. The elimination of the perennial water will not slow down runoff in the canyon.</p>
<p>COMMENT KS #50</p>	<p>RESPONSE KS #50</p>
<p>page 31 THE CLOSEST URBAN LAND, WHICH IS REALLY CLOSE, TO WELL CONVERSION PROJECT IS BURRELL, ISLAND VIEW AND DEL CERRO PARK. LOOK AT YOUR MAP.</p>	<p>The closet urban land uses to the Abalone Cove Well Conversion project are rural single-family residential units located off of Vanderlip Drive. These uses are located in close proximity to the discharge pipe line. The closest urban area to the well is residential development generally located northerly of the proposed project site.</p>
<p>COMMENT KS #51</p>	<p>RESPONSE KS #51</p>
<p>page 32 Discharge Pipe TWO HUNDRED FEET TO THE SOUTH TOWARD THE OCEAN HAS THE REMAINS OF THE WW II GUNNERY SITE, A FOUNDATION.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

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	Please refer to Response to Comment KS #35 related to archaeological resources.
COMMENT KS #52	RESPONSE KS #52
Access Road VANDERLIP DRIVEWAY	Please refer to Response to Comment KS #39 related to Vanderlip Drive.
COMMENT KS #53	RESPONSE KS #53
Exhibit 10. WITH THE GRIDS, I CAN NOT SEE WHERE THE POLES ARE GOING NOR CAN I FIGURE OUT WHERE THE LINE IS?	Please refer to Response to Comment KS #33 related to the location of power poles and lines.
COMMENT KS #54	RESPONSE KS #54
<p>Exhibit 11 IF A IS A VIEW TO THE WEST, B IS NOT A VIEW TO THE NORTH.</p> <p>EXHIBIT 12 VIEW C (SAYS NORTH BUT IS EAST) IS CROPPED VIEW B (EAST) A TRUE VIEW NORTH WOULD SHOW HOW CLOSE DEL CERRO PARK IS. HOW LONG WILL THE NEW DISCHARGE PIPE BE?</p> <p>SITE PHOTO E DOESN'T SHOW OVERHEAD UTILITIES. WHY NOT SHOW HOW UGLY A POWER POLE SITTING NEXT TO THE BOX ON A WILDERNESS HIKING TRAIL, JUST BELOW A \$2,500,000+ HOME LOOKS?</p> <p>SITE F IS NOT THE EASTERLY SIDE OF KELVIN CANYON. SITE F IS THE EASTERLY SIDE OF THE FARTHEST EAST FORK OF ALTAMIRA CANYON (AKA KATIE CANYON) AND BRANCHES OFF OF KELVIN CANYON BELOW THE SPRING. RATTLESNAKE TRAIL DOES NOT CROSS KATIE CANYON AS IT DOES KELVIN. IF THAT IS THE POWER SOURCE THE ROUTE IS DIRECT, TWO CANYONS, KELVIN AND KATIE CANYONS, WILL HAVE TO BE TRANSITED. THE EXACT ROUTE OF THE POLES NEED TO BE ADDRESSED IN THIS EIR AND EVALUATED. WHAT IMPACT WILL THERE BE ON KATIE CANYON?</p>	<p>Please refer to Response to Comment KS #33 related to the location of power poles and lines.</p> <p>Site Photo C is noted as:</p> <p style="padding-left: 40px;">View looking east of the existing monitoring well and location of the propose 2-inch PVC pipe above ground.</p> <p>Site Photo E is noted as:</p> <p style="padding-left: 40px;">Example of existing dewatering well.</p> <p>Site Photo E is not an example of overhead utility lines and power poles.</p> <p>Site Photo F is noted as:</p> <p style="padding-left: 40px;">Views of the easterly side of Kelvin Canyon and power source pole.</p> <p>The power source pole is shown in Site Photo F. The proposed power source is located on the easterly side of Kelvin Canyon. Addition area beyond and in addition to the power source is depicted in site photo. No impacts are anticipated to other canyons in the vicinity of the proposed project.</p> <p>Please refer to Response to Comment KS #33 for additionally information related to the location of the</p>

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	proposed power poles and power lines.
COMMENT KS #55	RESPONSE KS #55
page 38 "...and installation of power poles and lines from the easterly side of Kelvin Canyon to the existing monitoring well." DITTO (SITE F) THE REAL EASTER SIDE OF KELVIN CANYON HAS THE THICKEST COASTAL SAGE I HAVE EVER SEEN AND DOESN'T HAVE A POWER POLE. THE EAST SLOPE OF KATIE CANYON HAS A POWER POLE. THE NEW WELL WHICH SHOULD BE USED IS JUST UP THE FIRE ROAD.	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Additionally, please refer to Response to Comment KS #33 related to the location of power poles and lines.</p>
COMMENT KS #56	RESPONSE KS #56
"...no evidence..." DR. ELIG'S LETTER AND INFORMATION APPARENTLY WAS NOT SUPPLIED TO VISTA TO ENABLE VISTA TO DO AN ADEQUATE JOB.	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Additionally, please refer to Response to Comment KS #9 related to alternatives.</p>
COMMENT KS #57	RESPONSE KS #57
page 39 "...include...power poles...lines" THERE ARE NO POWER POLES OR POWER LINES LOCATED ON THE WEST OR EAST SIDE OF KELVIN CANYON. KELVIN CANYON IS A VERY UNIQUE, UNDERSTURVED ECOSYSTEM. THE ILLEGAL 4 WHEEL DRIVE PATH, GUNNERY FOUNDATION AND ILLEGAL WELL ARE THE ONLY MAN-MADE IMPROVEMENTS ON EITHER SIDE OF THE "KELVIN CANYON."	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Additionally, please refer to Response to Comment KS #54 related to the improvements on either side of Kelvin Canyon.</p>
COMMENT KS #58	RESPONSE KS #58
<p>"...no mitigation is possible..." YES, THE IMPACT CAN BE MITIGATED BY ALLOWING ENOUGH WATER IN THE STREAM TO SERVE THE NEEDS OF THE ANIMALS AND PLANTS. PROVIDE WATER BOWELS AS THE U.S. DEPT FISH & GAME AND THE CALIF. WILDLIFE SHOULD REQUIRE YOU TO.</p> <p>page 40 VANDERLIP DRIVEWAY</p> <p>"...will not...result in the creation of an aesthetically offensive site open to public view."</p> <p>UNCONTROLLED LOWERING OF THE</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>2. Prior to construction, project specifications shall be established providing written proof to the Director of Planning, Building, and Code Enforcement that the construction route of the proposed discharge pipeline will avoid sensitive biological resources. The route of the discharge pipeline will be flagged by a qualified biologist. The biologist will provide field inspection of the pipeline construction to verify that the route has been constructed as</p>

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<p>GROUNDWATER COULD ENDANGER THE THOUSANDS OF DEEP ROOTED TREES, INCLUDING PEPPER TREES. THIS MUST BE EVALUATED.</p>	<p>flagged. The biologist will submit a written certification of compliance with these routing requirements. Compliance with this measure shall be monitored by the Director of Planning, Building, and Code Enforcement.</p>
<p>COMMENT KS #59</p>	<p>RESPONSE KS #59</p>
<p>page 41 "The native vegetation in this area will not be altered..."</p> <p>BUT THE GNATCATCHER AND CACTUS WREN WILL BE DISTURBED. THEY SHOULD BE AVOIDED IN THIS WILDERNESS AREA.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The vegetation in the referenced area will not be altered. Impacts on biological resources are discussed in Section 5.0 Environmental Analysis - Biological Resources. Mitigation Measures 2, 3, and 6 have been provided to reduce or avoid biological resource impacts. The measures provide:</p> <ol style="list-style-type: none"> 2. Prior to construction, project specifications shall be established providing written proof to the Director of Planning, Building, and Code Enforcement that the construction route of the proposed discharge pipeline will avoid sensitive biological resources. The route of the discharge pipeline will be flagged by a qualified biologist. The biologist will provide field inspection of the pipeline construction to verify that the route has been constructed as flagged. The biologist will submit a written certification of compliance with these routing requirements. Compliance with this measure shall be monitored by the Director of Planning, Building, and Code Enforcement. 3. Prior to construction, project specifications shall be established providing written proof to the Director of Planning, Building, and Code Enforcement that construction will not occur during the breeding season of the California gnatcatcher and San Diego cactus wren. Compliance with this measure shall be monitored by the Director of Planning, Building, and Code

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	<p>Enforcement.</p> <p>6. Prior to construction, project specifications shall be established requiring notification to United States Army Corp of Engineers (COE) and California Department of Fish and Game (CDF&G) and approval from these agencies to mitigate potential impacts as a result of the project to a level of insignificance.</p> <p><i>The notification shall include the findings of surveys accomplished within a reasonable time of the notification for the following:</i></p> <ol style="list-style-type: none"> 1. <i>Palos Verdes blue butterfly;</i> 2. <i>Palos Verdes blue butterfly foodplants;</i> 3. <i>Pacific pocket mouse; and</i> 4. <i>California gnatcatchers.</i> <p>Compliance with this measure shall be verified by the Director of Public Works.</p>
<p>COMMENT KS #60</p>	<p>RESPONSE KS #60</p>
<p>Power Lines and Poles</p> <p>IF THE POLES GO OVER RATTLESNAKE TRAIL, THE HORSE TRAIL WILL BE DESTROYED AS THERE IS NO ROOM FOR BOTH.</p>	<p>It is a standard City policy to require adequate vertical clearance</p>
<p>COMMENT KS #61</p>	<p>RESPONSE KS #61</p>
<p>page 42 "No mitigation measures are available..." YES THERE IS BY UNDERGROUNDING THE UTILITIES.</p>	<p>Undergrounding of utilities would have significant impacts on biological resources. It was not a design consideration.</p>
<p>COMMENT KS #62</p>	<p>RESPONSE KS #62</p>
<p>"...visual character of the overall area from homes at higher elevations is not considered a significant impact." IT WILL BE ONCE THE GREENBELT DIES.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #61 related to</p>

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<p>page 43 "...cumulative aesthetic impact." YES IT IS ALL OF THE ABOVE GROUND PIPES BEING INSTALLED IN THE STABLE AREA. ABOVE GROUND PIPES SHOULD BE LIMITED TO THE 80 SLIDE ZONE.</p>	<p>the undergrounding of utilities.</p>
<p>COMMENT KS #63</p>	<p>RESPONSE KS #63</p>
<p>page 44 IT IS IMPOSSIBLE FOR STATION 56 LOCATED AT 12 CRESS ROAD IN ROLLING HILLS TO PROVIDE EMERGENCY MEDICAL SERVICES TO THIS SITE UNLESS THEY DRIVE 20 MINUTES DOWN CREST TO HAWTHORNE TO PVDS, PASSING STATION 53, UP NARCISSA TO VANDERLIP, THEN HIKE 10 MINUTES TO THE SITE. THEY CAN FIGHT A FIRE MOVING UP THE STEEP MOUNTAIN AT DEL CERRADO AS THEY DID LAST SUMMER.</p> <p>Exhibit 15 DOES NOT SHOW WHERE STATION 56 (12 CREST ROAD WEST) IS. STATION 53 IS MARKED BUT IT NOT RESPONSIBLE FOR THE WELL SITE. IT IS UP TOO HIGH.</p>	<p>Fire Station 53 is incorrectly labeled as 56 on Exhibit 15. Please refer to the Errata for the following change.</p> <p style="text-align: center;">"...Fire Station 56 53..."</p> <p>Response times were provided by the County of Los Angeles - Fire Department.</p>
<p>COMMENT KS #64</p>	<p>RESPONSE KS #64</p>
<p>page 44 I HAVE TWO PAGES, THE FIRST ONE RECOUNTS HOW A BIRD ON A POWER LINE. THE SECOND END WITH POWER LINES HAVE BEEN A FACTOR.</p>	<p>Please refer to the Errata in this Response to Comments and Final EIR.</p> <p>The last paragraph on page 44 has been revised to read as follows:</p> <p style="text-align: center;"><i>Power lines have been a factor in a fire in the vicinity of the proposed project. A bird contacting power lines in the vicinity of the proposed project cause approximately a 100-acre fire (pers. comm. Battalion Chief Gordon Pearson, July 10, 1996)(page 44).</i></p>
<p>COMMENT KS #65</p>	<p>RESPONSE KS #65</p>
<p>page 46 FIRE PROTECTION RESPONSE TIME TO THE WELL IS IMPOSSIBLE. EVEN WITH THE GRAVEL ROAD, THE FIRE DEPARTMENT WILL HAVE TO HIKE OR CALL IN AIR SUPPORT. WHEN THEY PUT THE SMOLDERING FIRE OUT NEAR THE WELL, THEY PARKED ON VANDERLIP AND HIKED UP THE ROAD. 40-45 MINUTES TO RESPOND TO THE SITE WITHOUT EQUIPMENT IS MORE REALISTIC IF THEY DO NOT USE HELICOPTER ASSISTANCE.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Additionally, please refer to Response to Comment KS #63 related to the County of Los Angeles - Fire Department response times.</p>

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COMMENT KS #66	RESPONSE KS #66
<p>Fire Protection page 47 THE FIRE DEPARTMENT CAN REDUCE THE DANGER FROM OVERHEAD WIRING BY REQUIRING A SAFETY NET UNDER THE WIRE OR REQUIRING UNDER GROUNDING. WHAT ELSE CAN THEY REQUIRE FOR SAFETY?</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The Fire Department has the ability to modify the project plans as needed for safety. Mitigation Measure 1 provides:</p> <ol style="list-style-type: none"> 1. Prior to construction and installation of the dewatering well system, project specifications shall be established providing written proof to the Director of Public Works of the following: <ol style="list-style-type: none"> a. The review of the plans and specifications by the Southern California Edison Company (SEC); and b. The review and approval of plans and specifications by the Los Angeles County Fire Department. <p>Project plans and specifications shall comply with all applicable fire, building, electrical, and mechanical codes and any other fire protection measures deemed necessary by the Fire Department. Compliance with this measure shall be monitored by the Director of Planning, Building, and Code Enforcement.</p>
COMMENT KS #67	RESPONSE KS #67
<p>page 49 Access Road VANDERLIP DRIVEWAY</p> <p>INCREASE FIRE HAZARD WILL INCREASE BECAUSE OTHER 4 WHEEL DRIVE VEHICLES WILL USE THE ROAD. IF THEY TRY TO TURN AROUND, THE TIRE FRICTION FROM THEIR VEHICLE COULD START A FIRE (HAPPENED BEFORE).</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The Fire Department has the ability to modify the project plans as needed for safety. Mitigation Measure 1 provides:</p> <ol style="list-style-type: none"> 1. Prior to construction and installation of the dewatering well system, project specifications shall be established providing written proof to the Director of Public Works of the following: <ol style="list-style-type: none"> a. The review of the plans and specifications by the Southern

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	<p>California Edison Company (SEC); and</p> <p>b. The review and approval of plans and specifications by the Los Angeles County Fire Department.</p> <p>Project plans and specifications shall comply with all applicable fire, building, electrical, and mechanical codes and any other fire protection measures deemed necessary by the Fire Department. Compliance with this measure shall be monitored by the Director of Planning, Building, and Code Enforcement.</p>
<p>COMMENT KS #68</p>	<p>RESPONSE KS #68</p>
<p>“Project plans...comply with all applicable ...building, electrical..codes...”</p> <p>THEN THE UTILITIES MUST BE PLACED UNDERGROUND. A POWER POLE WAS HIT BY LIGHTENING AND A FIRE STARTED. IT TOOK OVER 30 MINUTES BEFORE THE FIRE DEPARTMENT ARRIVED BECAUSE EMERGENCY SERVICES WERE OUT AND THE FIRE DEPARTMENT DID NOT RECEIVE THE CALL PROMPTLY.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers. Please refer to Response to Comment KS #61 related to the undergrounding of utilities.</p> <p>The Fire Department has the ability to modify the project plans as needed for safety. Mitigation Measure 1 provides:</p> <ol style="list-style-type: none"> 1. Prior to construction and installation of the dewatering well system, project specifications shall be established providing written proof to the Director of Public Works of the following: <ol style="list-style-type: none"> a. The review of the plans and specifications by the Southern California Edison Company (SEC); and b. The review and approval of plans and specifications by the Los Angeles County Fire Department. <p>Project plans and specifications shall comply with all applicable fire, building, electrical, and mechanical codes and any other fire protection measures deemed necessary by the Fire Department. Compliance with this measure shall be monitored by the Director of Planning, Building, and Code Enforcement.</p>

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COMMENT KS #69	RESPONSE KS #69
<p>Plant Species Diversity</p> <p>“The RDA area is floristically diverse more species are found in the RDA area than in most areas in the region of a similar size...”</p> <p>MORE SPECIES ARE FOUND UP AND DOWN KELVIN CANYON BUT WE MAY NEVER KNOW THE VAST RICHNESS OF THE SITE WITHOUT PROTECTING IT.</p> <p>page 53 “The canyon is one of several canyons with perennial water on the west side of the hill from San Pedro to Malaga Creek in Palos Verdes.”</p> <p>PLEASE LIST THE SEVERAL CANYONS. THIS IS THE ONLY NATURAL SPRING ON THE SOUTH SIDE OF THE PENINSULA.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>This information was based upon a survey of the RDA area including Kelvin Canyon conducted by The Planning Center. The survey is included in the Draft EIR as Appendix B.</p> <p>Additionally, please refer to the Errata section of this Response to Comments and Final EIR. The EIR has been revised to state:</p> <p style="padding-left: 40px;">...This is one of several There are two (2) canyons with perennial water on the west side of the hill from San Pedro to Malaga Creek in Palos Verdes Estates (page 62).</p>
COMMENT KS #70	RESPONSE KS #70
<p>page 57 “Pacific pocket mouse...determined that it is not present in the RDA area.”</p> <p>WHAT EVIDENCE DO YOU HAVE THAT THE PACIFIC POCKET MOUSE IS NOT LOCATED IN THE KELVIN CANYON SPRING ECOSYSTEM? PLACING TRAPS IN LOWER ALTAMIRA CANYON DOESN'T COUNT!</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The Pacific pocket mouse was not located in the Altamira Canyon Drainage Control Project area. No trappings were accomplished related to the proposed project. Actions necessary to implement this project will be routed away from sensitive habitat. Mitigation Measures 2, 3, 5, and 6 have been provided to reduce impacts to biological resources. Mitigation Measures 2, 3, 5, and 6 state:</p> <p style="padding-left: 40px;">2. Prior to construction, project specifications shall be established providing written proof to the Director of Planning, Building, and Code Enforcement that the construction route of the proposed discharge pipeline will avoid sensitive biological resources. The route of the discharge pipeline will be flagged by a qualified biologist. The biologist will provide field inspection of the pipeline construction to verify that the route has been constructed as flagged. The biologist will submit a written certification of compliance with</p>

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	<p>these routing requirements. Compliance with this measure shall be monitored by the Director of Planning, Building, and Code Enforcement.</p> <p>3. Prior to construction, project specifications shall be established providing written proof to the Director of Planning, Building, and Code Enforcement that construction will not occur during the breeding season of the California gnatcatcher and San Diego cactus wren. Compliance with this measure shall be monitored by the Director of Planning, Building, and Code Enforcement.</p> <p>5. Prior to construction, project specifications shall be established to monitor the velocity of water at the beach discharge after implementation of the project. Project dewatering shall be temporarily halted and installation of erosion control measures (natural rock energy dissipater) shall occur should the Director of Planning, Building, and Code Enforcement determine that erosive velocities occurred. The installation of the erosion control measures, if required, shall be approved by the Director of Public Works. Compliance with this measure shall be verified by the Director of Public Works.</p> <p>6. Prior to construction, project specifications shall be established requiring notification to United States Army Corp of Engineers (COE) and California Department of Fish and Game (CDF&G) and approval from these agencies to mitigate potential impacts as a result of the project to a level of insignificance.</p> <p><i>The notification shall include the findings of surveys accomplished</i></p>
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	<p style="text-align: right;"><i>within a reasonable time of the notification for the following:</i></p> <ol style="list-style-type: none"> 1. <i>Palos Verdes blue butterfly;</i> 2. <i>Palos Verdes blue butterfly foodplants;</i> 3. <i>Pacific pocket mouse; and</i> 4. <i>California gnatcatchers.</i> <p style="text-align: right;">Compliance with this measure shall be verified by the Director of Public Works.</p>
<p>COMMENT KS #71</p>	<p>RESPONSE KS #71</p>
<p>Exhibit 19 THE MAP INDICATES THAT THERE IS AN IMPRESSIVE GNATCATCHER AND CACTUS WREN AREA IDENTIFIED IN THE ROUTE OF THE POWER POLE. PLEASE SHOW THE EXACT PLACEMENT OF THE POLES, DISCUSS HOW ONE LIFTS THESE POLES INTO PLACE WITHOUT DISTURBING THE HABITATS.</p> <p>page 59 NO ONE KNOWS WHAT UNIQUE OR RARE PLANTS OR ANIMALS ARE LIVING WITHIN THE 2,000 FEET LONG WETLANDS AND WHAT THE LOSS OF THE WETLANDS WILL DO.</p> <p>page 60 THE INSTALLATION OF THE POLES WILL HAVE AN IMPACT ON BIOLOGICAL RESOURCES.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to the Errata section of this EIR. Additionally the EIR states:</p> <p style="text-align: center;">Plant Species Diversity</p> <p>The proposed project will reduce the total number of plants presently found in Kelvin Canyon by the elimination of the perennial water source. The significance of this as a project-specific and cumulative impact is also discussed below.</p> <p style="text-align: center;">Sensitive Plant Communities</p> <p style="text-align: center;">COASTAL SAGE SCRUB</p> <p>As previously indicated, the proposed project will impact approximately 64 square feet of Coastal sage scrub habitat by the construction of power poles. This assumes that a maximum of four (4) power poles will be installed. Each power pole will impact an approximately four (4) square feet area. A worst case assumption has been made that the entire 64 square feet of loss will be Coastal sage scrub habitat. This small direct loss of this habitat is not considered a significant impact.</p> <p>Additionally, the City of Rancho Palos Verdes has agreed to provide for the revegetation of an area equal to the area impacted by the installation of the power poles, if they are</p>

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	<p>located in Coastal sage scrub.</p> <p>OPEN CHANNEL HABITAT/STREAM BED WITH RIPARIAN ELEMENTS</p> <p>The operation of the dewatering well system will impact the Open Channel Habitat/Stream Bed With Riparian Elements habitat located in Kelvin Canyon. The canyon in the vicinity of the proposed project contains a spring with perennial water. The perennial water supports a riparian habitat. This is one of several <i>There are two (2) canyons</i> with perennial water on the west side of the hill from San Pedro to Malaga Creek in Palos Verdes Estates. It is considered unique related to wildlife and local habitat diversity. The proposed project will eliminate the spring and perennial water in the mid-section of Kelvin canyon. This is considered a significant unavoidable adverse impact on biological resources.</p> <p>If the proposed project is implemented, this biological resource impact can not be eliminated through mitigation. The Alternatives Section of this EIR presents an alternative to the proposed project that will reduce and/or eliminate this impact (page 62).</p> <p>This information was based upon a survey of the RDA area including Kelvin Canyon conducted by The Planning Center. The survey is included in the Draft EIR as Appendix B.</p> <p>The proposed project will impact 64 square feet of coastal sage scrub habitat. Please refer to the Errata and Response to Comment CNPS #2 related to impacts from construction of power lines and poles. Please refer to Response to Comment CNPS #6 for information related to the two (2) canyons with perennial streams and to the Errata of this Response to Comments and Final EIR.</p>
<p>COMMENT KS #72</p>	<p>RESPONSE KS #72</p>
<p>THERE IS NO "IMPROVED DIRT ROAD FOR THE GRAVEL TRUCK DELIVERIES. HOW MANY TRUCKS OF GRAVEL? HOW LONG IS THE ROAD? HOW STEEP? HOW WILL IT BE CONTOURED TO MEET SAFETY REQUIREMENTS? SINCE THE GRAVEL WILL BE COVERING A 100 YEAR OLD</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #3 related to the access road.</p>

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HORSE TRAIL, WHERE CAN THE HORSES RIDE, IN THE GNATCATCHER HABITAT NEXT TO THE ROAD?	
COMMENT KS #73	RESPONSE KS #73
"No other maintenance is required." THE CURRENT DEWATERING WELL PUMPS NEED MAINTENANCE. LOOK AT THE RECORDS. ELECTRIC METER WILL BE READ MONTHLY BY SCE.	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comments KS #3, KS #32, and KS #40 related to trips to the well site.</p>
COMMENT KS #74	RESPONSE KS #74
page 61 Mitigation PROVIDE WATER FOR CALIFORNIA WALNUT, WALLOWS, ETC.	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>
COMMENT KS #75	RESPONSE KS #75
<p>Access Road</p> <p>KELVIN CANYON CROSSING BECOMES IMPASSABLE DURING CERTAIN TIMES OF THE YEAR. IT IS ALSO ILLEGAL TO DRIVE THROUGH THE CANYON.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #3 related to the access road.</p>
COMMENT KS #76	RESPONSE KS #76
<p>page 62 "The proposed project will reduce the total number of plants presently found in Kelvin Canyon by the elimination (or reduction) of the perennial water source."</p> <p>FOR THIS EIR TO BE COMPLETE, THE PLANTS WITHIN THE WETLANDS SHOULD BE IDENTIFIED BEFORE THEIR DESTRUCTION. RATE PLANTS COULD BE HARVESTED.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #71 related to the biological surveys.</p>
COMMENT KS #77	RESPONSE KS #77
"...mid-section" THE SPRING IS LOCATE IN THE UPPER SECTION OF THE CANYON	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to the Errata section of this Response to Comments and Final EIR. The following revision has been make to the EIR:</p>

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	<p style="text-align: center;">"...in the mid-section of Kelvin Canyon." (page 62)</p> <p>Additionally, please refer to Response to Comment CNPS #8 related to biological resource impacts.</p>
COMMENT KS #78	RESPONSE KS #78
<p>"impact approximately 64 square feet..." PREVIOUS PAGE INDICATED 80 SQ FT.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to the Errata section of this Response to Comments and Final EIR and Response to Comment CNPS #6 related to biological resources.</p>
COMMENT KS #79	RESPONSE KS #79
<p>MITIGATION OF LOSS OF WATER FOR PLANTS: SPRAY OR DRIP IRRIGATION POSSIBLE.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Mitigation measures are not required as no significant biological resource impact has been identified.</p>
COMMENT KS #80	RESPONSE KS #80
<p>page 65 THE ENTIRE LENGTH OF THE WETLANDS MUST BE EVALUATED IN ORDER TO PROPERLY EVALUATE THE IMPACT FOR THIS EIR. KELVIN CANYON SPRING ECOSYSTEM IS ONE OF THE LAST, INACCESSIBLE AREAS WHICH COULD BE SUPPORTING RARE OR YET TO BE DISCOVERED PLANT OR WILDLIFE. NOISE LEVEL OF VEHICLE BOTH AUTHORIZED AND UNAUTHORIZED, IS OT ACCEPTABLE. NO VEHICLES SHOULD BE ALLOWED. WALK-IN ONLY.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>No noise impacts from the operational phase of the dewatering well system were identified.</p> <p>Please refer to Response to Comment CNPS #3, KS #32, and KS #40 related to trips to the well site.</p> <p>Please refer to Response to Comment KS #71 related to biological resources.</p>
COMMENT KS #81	RESPONSE KS #81
<p>page 66 CUMULATIVE IMPACT OF DEWATERING ALL WELLS WITHIN THE RDA SHOULD BE ADDRESSED. MILLIONS OF GALLONS OF WATER ARE BEING EXTRACTED BY ENVIRONMENTALLY UNAWARE PEOPLE WITHOUT EXPERT COORDINATION. WHAT LEVEL OF GROUND WATER DO THE DEEP ROOTED TREES REQUIRE?</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The cumulative e projects evaluated in the Draft EIR are describe in Section 4.0 Local and Regional Setting.</p> <p>Please refer to Comment CNPS #6 related to biological resources.</p>

4.0 Responses to Comments

COMMENT KS #82	RESPONSE KS #82
<p>TWO HAND CARVED STEATITE TRADING OBJECTS WERE RECENTLY DISCOVERED IN THE KELVIN CANYON ECOSYSTEM. STEATITE IS ONLY FOUND ON CATALINA ISLAND. BILL SAMARAS WHO DISCOVERED THE ONLY EXISTING FOSSIL OF THE PACIFIC GREY WHALE IN THE WORLD, IDENTIFY THE TWO STONES ON SEPTEMBER 29, 1996. HE COMMENTED THAT THE POWI INDIANS, WHO LIVED ON CATALINA, USED THEIR BOATS TO COME TO PORTUGUESE BEND TO TRADE. MR. SAMARAS TOOK A SCRAPING OF THE TWO OBJECTS.</p> <p>DONALD MORE GALES, AUTHOR OF THE <u>HANDBOOK OF WILDFLOWERS, WEEDS WILDLIFE AND WEATHER ON THE PALOS VERDES PENINSULA</u>, DISCOVERED THE INDIAN MIDDEN ON RATTLESNAKE TRAIL IN THE BOTTOM OF THE CANYON. THE KELVIN CANYON SPRING WATER HAS BEEN USED HUNDREDS OF YEARS BY THE "LOCALS."</p> <p>THE SITE OF THE POWER POLES CAN NOT BE LOCATED ON RATTLESNAKE TRAIL. USING HON'S NEW WELL WILL AVOID THE ARCHAEOLOGICAL SITES.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Comment K #35 related to archaeological resources.</p>
COMMENT KS #83	RESPONSE KS #83
<p>page 72 THE WORD LANDSLIDE SHOULD BE LIMITED TO THE 80 ACRE SITE AND NOT BE USED INTERCHANGEABLE WITH STABLE LAND.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>
COMMENT KS #84	RESPONSE KS #84
<p>Exhibit 20 INDICATED THE PROPOSED WELL SITE IS OUTSIDE OF THE ANCIENT INACTIVE LANDSLIDE.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The addition of this information does not change the conclusions of the EIR.</p>
COMMENT KS #85	RESPONSE KS #85
<p>Page 74 KELVIN CANYON IS THE MAIN EAST FORK OF ALTAMIRA CANYON. KATIE CANYON BRANCHES OFF OF KELVIN TO THE EAST.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

4.0 Responses to Comments

COMMENT KS #86	RESPONSE KS #86
<p>Landslide Factors</p> <p>"...bedrock dipping at the shallow angles toward the ocean..."</p> <p>JUST ABOVE UPPER NARCISSA, THE BEDROCK DIPS AT THE SHALLOW ANGLES AWAY FROM THE BEACH WHILE THE SLIDE ZONE DIPS TOWARD THE BEACH.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>
COMMENT KS #87	RESPONSE KS #87
<p>page 75 THE ABALONE COVE BEACH LANDSLIDE WAS DISCOVERED IN 1974 BY DAVID LARUE SOUTH OF PALOS VERDES DRIVE SOUTH AT THE BEACH. A WARNING OF THE LANDSLIDE WAS REPORTED ON THE FRONT PAGE OF THE "PENINSULA NEW" WITH A PICTURE OF THE SLIDE. THE LANDSLIDE INCREASED IN SIZE AFTER THE 100 YEAR STORMS IN 1977-78 AND CROSSED THE DRIVE AND CAUSED DESTRUCTION TO DWELLINGS IN 1978. THE SLIDE WAS ACTIVATED BY THE DUMPING OF WATER FROM NEW CONSTRUCTION NEAR ISLAND VIEW AND DEL CERRO PARK INTO ALTAMIRA CANYON.</p> <p>THE EASTERN BOUNDARY OF PORTUGUESE BEND LANDSLIDE AND THE WESTERN BOUNDARY OF THE KLONDIKE CANYON LANDSLIDE APPEAR TO BE MOVING FASTER AFTER THE CITY ALLOWED DIRT REMOVAL FROM THE SUPPORT AREA TO PALOS VERDES DRIVE SOUTH.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>
COMMENT KS #88	RESPONSE KS #88
<p>page 79 DR. ELIG CLAIMS THAT THE 80 ACRE ABALONE COVE LANDSLIDE STOPPED.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to the Errata and Response to Comment KS # 9 related to alternatives to the proposed project and Dr. Elig's report to the RDA.</p>
COMMENT KS #89	RESPONSE KS #89
<p>page 80 "...installation in accordance with all ...building</p>	<p>Comment noted. The comment is acknowledged and will</p>

4.0 Responses to Comments

<p>codes standards...” RANCHO PALOS VERDES CODES CLEARLY STATE THAT NEW CONSTRUCTION SHOULD BE UNDERGROUND. SCE DOESN'T WANT THE POLES TO CROSS THE CANYON(S).</p>	<p>be forwarded to the appropriate decision makers. Please refer to Response to Comments KS #61 and KS #68.</p>
<p>COMMENT KS #90</p>	<p>RESPONSE KS #90</p>
<p>Page 81 WATER QUALITY TESTING OF DISCHARGE PIPE SHOULD BE MONITORED AS FREQUENTLY AS THE PUMPING STATIONS DUE TO THE POTENTIAL OF SEWAGE DISCHARGE ONTO THE BEACH.</p> <p>Altamira Canyon WATER RUNS FROM ISLAND VIEW STREET DRAINS ALL YEAR LONG. ASK LOIS LARUE.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Water quality testing is conducted in accordance with all applicable regulations by the County and Sanitation Districts.</p> <p>Testing of water quality at the discharge pipelines was conducted by the RDA in 1996.</p>
<p>COMMENT KS #91</p>	<p>RESPONSE KS #91</p>
<p>page 87 THE KELVIN CANYON SPRING DOES IS NOT LOCATED IN THE MIDSECTION OF KELVIN CANYON. IT IS LOCATED TOWARD THE MOST NORTHERN PART.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to the Errata and Responses to Comments KS #77 and CNPS #8 relate to the location of the Kelvin Canyon spring.</p>
<p>COMMENT KS #92</p>	<p>RESPONSE KS #92</p>
<p>page 90 WATER RESOURCES: THE RESULTS OF THE PROJECT WILL INTERFERE SUBSTANTIALLY WITH GROUNDWATER RECHARGE AND DR. ELIG'S MEMO WILL CONFIRM THIS. (CITY HAS A COPY AND IT SHOULD BE EVALUATED).</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to the Errata and Response to Comment KS # 9 related to alternatives to the proposed project and Dr. Elig's report to the RDA.</p>
<p>COMMENT KS #93</p>	<p>RESPONSE KS #93</p>
<p>page 93 DRIVING THROUGH A BLUE LINE STREAM ALTERS THE BED.</p> <p>APPROVAL AND NOTICE TO CALIFORNIA WATER RESOURCES BOARD IS NECESSARY WHEN YOU PLAN TO TAKE WATER AND WHEN YOU PLAN ON DUMPING THE WATER IN THE OCEAN (NON-DRINKING WATER INCLUDED).</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Responses to Comments KS #1 and KS #43 related to water resources..</p>

4.0 Responses to Comments

COMMENT KS #94	RESPONSE KS #94
ROAD LENGTH MUST BE ADDRESSED.	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #3 related to the access road.</p>
COMMENT KS #95	RESPONSE KS #95
page 95 HOW MANY GALLONS PER MINUTE CAN BE PUMPED FROM WELL IN THE PIPE SIZE?	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>It has been the RDA's experience that similar wells will generate between 10,000 gallons per day (gpd)/ 7.0 gallons per minute (gpm) and 48,000 gpd/33 gpm.</p>
COMMENT KS #96	RESPONSE KS #96
page 96 "project will meet applicable Building Codes..." THEM PUT THE UTILITIES UNDERGROUND	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #61 related to utilities.</p>
COMMENT KS #97	RESPONSE KS #97
page 96 "...shall execute and cause to be recorded a waiver..." WHAT WAIVER? RECORDING A DOCUMENT WITH RDA-"SLUM CLEARANCE" WOULD BE A DISASTER AND IS UNACCEPTABLE. IF ONE HAS RECORDED RIPARIAN RIGHTS WITH THE CALIFORNIA WATER RESOURCES BOARD AND THE PROJECT IS TAKING RIGHTS AWAY...THE CITY NEEDS TO SIGN THE AGREEMENT, NOT ME.	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #1 related to water rights.</p>
COMMENT KS #98	RESPONSE KS #98
page 98 ALTERNATIVES TO THE PROPOSED PROJECT THE CITY SHOULD HAVE PROVIDED VISTA WITH DR. ELIG'S RECOMMENDATIONS TO USE THE NEW HON WELL OFF OF CRENSHAW EXTENSION WHICH IS NEAR TO POWER AND HAS A SAFE ROAD TO IT.	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #9 related to alternatives; Response to Comment KS #28, KS #58, AND KS #71 related to biological resource impacts; and Response to Comment KS #35 related to archaeological</p>

4.0 Responses to Comments

<p>OTHER WELLS ARE IN THE AREA AND WILL PROBABLY BE DEWATERED. THIS SITE VERY COST EFFECTIVE WITH EASY ACCESS AND NOT FIRE HAZARD. THIS EIR SHOULD HAVE USED IT AS AN ALTERNATIVE DURING THE ENVIRONMENTAL REVIEW. THIS SITE SELECTION WOULD ALSO SAVE THE 80 SQ FT GNATCATCHER HABITAT AND THE INDIAN MIDDEN.</p>	<p>resource impacts.</p>
<p>COMMENT KS #99</p>	<p>RESPONSE KS #99</p>
<p>PAGE 111 WITH THE DEVASTATION AND REMOVAL OF A GNATCATCHER HABITAT AT THE SITE OF THE WELL UNDER INVESTIGATION, I WOULD HOPE THAT OUR CITY WOULD KNOW UNDERSTAND THE IMPACT BEFORE ALLOWING "BORING PERMITS."</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>
<p>COMMENT KS #100</p>	<p>RESPONSE KS #100</p>
<p>page 114 Del Cerro Park SO CAL EDISON SAYS THAT THIS POWER CONNECTION IS THE ONLY FEASIBLE SOURCE. THIS NEEDS FURTHER EVALUATION.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #33 related to the power source for the proposed project.</p>
<p>COMMENT KS #101</p>	<p>RESPONSE KS #101</p>
<p>THE EIR SHOULD DISCUSS THE IMPACT OF THIS PROJECT TO CONFORM TO CORPS OF ENGINEERS, DEPARTMENT OF THE ARMY 33 CFR PARTS 320 THROUGH 330. THE EIR SHOULD DISCUSS THE POTENTIAL IMPACT AND MITIGATION TO RIPARIAN WATER RIGHTS WHICH THE ANIMAL, PLANTS AND I HAVE ESTABLISHED IN PERPETUITY. I DO NOT WANT TO GIVE THEM UP OR HAVE TAKEN.</p> <p>THE CITY MUST OBTAIN PERMISSION FROM THE RIPARIAN USERS TO PUMP THE MONAHAN (ABALONE COVE) WELL WHICH WILL DEplete THE KELVIN CANYON SPRING. THE LOSS OF RIPARIAN WATER RIGHTS MUST BE ADDRESSED AND MITIGATED. THE MITIGATION MUST LAST IN PERPETUITY.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #1 related to water resource impacts.</p>

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COMMENT KS #102	RESPONSE KS #102
<p>THE U.S. ARMY CORP OF ENGINEERS, STATE OF CALIFORNIA WATER RESOURCES BOARD AND CALIFORNIA FISH & GAME, TO ONLY NAME A FEW AGENCIES, ALL REQUIRE PERMITS AND/OR APPROPRIATE MITIGATION. WASTEFUL DISPOSAL OF ANY QUALITY OR WATER IS NOT PERMITTED. THE WASTEFUL DUMPING OF SPRING WATER IS PROHIBITED BY MANY GOVERNMENTAL AGENCIES AND SHOULD BE ADDRESSED. ALTERNATIVES TO USING KELVIN CANYON SPRING WATER, WHICH THE WELL WILL PUMP, SHOULD BE ADDRESS.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #43 related to agencies contacted during the environmental review process.</p> <p>Additionally, please refer to Response to Comment KS #9 related to alternatives and Response to Comment KS #1 related to water resources.</p>
COMMENT KS #103	RESPONSE KS #103
<p>“The proposed Abalone Cove Well Conversion project...”</p> <p>THIS IS NOT A WELL CONVERSION PROJECT. PROPER PERMITS WERE NOT OBTAINED TO DRILL A WELL. THE DEVELOPER MERELY CAPPED OFF A HOLE WHICH WAS BORED TO OBTAIN SOIL SAMPLES. WATER WELLS ARE FORBIDDEN ON THIS PROPERTY AS COVERED IN THE GRANT DEED.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #28 related to the existing monitoring well.</p>
COMMENT KS #104	RESPONSE KS #104
<p>THIS DISCHARGE OF WATER WILL BE MADE DIRECTLY ONTO A BEACH WHICH IS NOT PRIVATE PROPERTY. COASTAL COMMISSION PERMISSION??? ONGOING TESTING OF THE DISCHARGED WATER SHOULD BE PROVIDED TO PROTECT THE OCEAN FROM POLLUTION. NO PREVIOUS EIRS WERE COMPLETED TO DETERMINE THE IMPACT OF WATER DISCHARGED AT THE BEACH. THE IMPACT SHOULD BE EVALUATED.</p> <p>THE EIR MUST ADDRESS WHAT PROCESS WOULD HAVE BEEN NECESSARY IF THE WELL AND THE “DIRT ROAD” WERE CONSTRUCTED ILLEGALLY AND WITHOUT DUE PROCESS. VALUABLE GNATCATCHER AND CACTUS WREN HABITAT WERE LOCATED NEAR OR WHERE THE “WELL” IS NOT PLACED. ONE OF THE PROJECT’S POWER POLLS IS NEAR OR ON THE PALOS VERDES BLUE BUTTERFLY HABITAT. THE PROJECT AREA MUST</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The well and dirt road were not constructed illegally. Please refer to Response to Comment KS #43 related to agencies contacted during the environmental review process.</p> <p>Additionally, please refer to Response to Comment KS #1 related to water resources.</p>

4.0 Responses to Comments

<p>INCLUDE ENTIRE AREA OF ELECTRIC LINES, WATER LINES AND ACCESS TRAILS FOR PROPER EVALUATION OF IMPACT AND MITIGATION.</p>	
<p>COMMENT KS #105</p>	<p>RESPONSE KS #105</p>
<p>OPERATING A MOTOR VEHICLE IN THE WEEDS AND ON A HORSE TRAIL IS IN DIRECT VIOLATION OF THE RANCHO PALOS VERDES MUNICIPAL CODES, LOS ANGELES COUNTY CODES AND THE COASTAL SPECIFIC PLAN. DRIVING A VEHICLE OVER WEEDS IN THIS AREA CAUSED A FIRE WHEN A TIRE SPUN ON DRY WEEDS. ANOTHER FIRE WAS STARTED BY A FOUR WHEEL DRIVE'S CATALYTIC CONVERTER SPARKING ON WEEDS. USING THE "DIRT ROAD" IS UNSAFE AND SHOULD BE ADDRESSED.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #4 related to impacts to Public Services - Fire Protection.</p>
<p>COMMENT KS #106</p>	<p>RESPONSE KS #106</p>
<p>THE EDISON COMPANY HAS ALREADY TOLD THE CITY STAFF THAT CROSSING KELVIN CANYON WITH POWER POLES IS NOT FEASIBLE SO THE CITY STAFF HAS DECIDED TO INSTALL "PRIVATE" POLES AND HAVE THE METER READ NEAR THE NEW WELL ON HON'S PROPERTY WHICH SHOULD BE CONSIDERED AS AN ALTERNATIVE. THIS DRAFT HAS FAILED TO ADDRESS THE FEASIBILITY OF POLES PLACED IN KELVIN CANYON BASED ON SO CAL EDISON'S VIEWPOINT.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #9 related to alternative and Response to Comment KS #33 related to the location of power poles and lines and communications with the Southern California Edison Company,</p>
<p>COMMENT KS #107</p>	<p>RESPONSE KS #107</p>
<p>THE DEWATERING WELL ON SWEETBAY NEAR KELVIN CANYON PRODUCES A LOT OF WATER MAKING THIS PROJECT UNNECESSARY. DEWATERING THIS HIGH UP IS A WAY TO HAVE THE HORAN MONIES PAY TO STOP WATER FROM ENTERING PORTUGUESE BEND SLIDE. THOSE IN PB SLIDE DO NOT HAVE LIENS ON THEIR HOMES TO PAY FOR THE WELLS.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>A funding source for the proposed project is not a CEQA issue.</p>
<p>COMMENT KS #108</p>	<p>RESPONSE KS #108</p>
<p>DEWATERING THE MONAHAN WELL WILL CAUSE CONSIDERABLE DAMAGE TO OVER 2,000 FEET OF A YEAR ROUND SPRING AND THE RIPARIAN</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

4.0 Responses to Comments

<p>USERS. THE FIRE POTENTIAL, WHICH THE ELECTRICAL LINES WILL BRING INTO A RURAL AREA COULD CAUSE, IS GREAT. HAVING VEHICLES DRIVE IN AREAS WHICH ARE RESTRICTED TO MOTOR TRAFFIC, INCLUDING ATV'S, IS VERY DANGEROUS.</p>	<p>Please refer to Responses to Comments CNPS #8 related to the spring; KS #28, KS #58, KS #71 related to impacts to the biological resource; Response to Comment KS #33 related to location of electrical lines; and Response to Comment KS #64, KS #65, and KS #67 related to Public Services - Fire Protection.</p>
<p>COMMENT KS #109</p>	<p>RESPONSE KS #109</p>
<p>AIR MOVEMENT WILL CHANGE WHEN THE TREES DIE FROM LACK OF WATER. MOISTURE, TEMPERATURE AND A CHANGE IN CLIMATE AT A LOCAL LEVEL WILL OCCUR. THE TEMPERATURE ALONG THE SPRING IS NOW 10-20 DEGREES COOLER THAN OTHER AREAS.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #22 related to impacts to the air quality.</p>
<p>COMMENT KS #110</p>	<p>RESPONSE KS #110</p>
<p>THIS PROJECT WILL SUBSTANTIALLY INTERFERE WITH THE GROUNDWATER RECHARGE EFFECTING KELVIN CANYON SPRING AND CAUSE DEGRADATION OF THE KELVIN CANYON SPRING WATER QUALITY. CALIFORNIA WATER RESOURCES BOARD AND THE U.S. ARMY CORPS DO NOT APPROVE OF DUMPING OR WASTING WATER, EVEN THOUGH IT IS NOT DRINKING QUALITY.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #43 related to agencies contacted during the environmental review process.</p>
<p>COMMENT KS #111</p>	<p>RESPONSE KS #111</p>
<p>KELVIN CANYON SPRING SUPPLIES THE ONLY FRESH WATER ON THE SOUTH SIDE OF THE PENINSULA FOR MIGRATORY AND LOCAL BIRDS, WILD ANIMALS, ORGANISMS AND INSECTS. WILDLIFE HABITAT WILL DETERIORATE WHEN THE SPRING'S SOURCE IS REMOVED THROUGH PUMPING THE WELL.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to the Errata and Response to Comment CNPS #8 relate to springs on the Palos Verdes Peninsula.</p>
<p>COMMENT KS #112</p>	<p>RESPONSE KS #112</p>
<p>THE PRESENT AND FUTURE LAND USE OF THE AREA SOUTH OF VANDERLIP DRIVEWAY IN KELVIN CANYON SPRING IS PROTECTED WILDLIFE HABITAT, ESTABLISHED AND PROTECTED IN PERPETUITY BY THE SNELL/PILOT FAMILY. WITHOUT THE GUARANTEE OF A SOURCE OF WATER IN PERPETUITY, THE HABITAT</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

4.0 Responses to Comments

WILL BE DESTROYED.	
COMMENT KS #113	RESPONSE KS #113
THE SPRING WATER NOW BEING USED FOR AGRICULTURAL PURPOSES.	Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.
COMMENT KS #114	RESPONSE KS #114
INTRODUCING ELECTRICAL POWER ABOVE GROUND, IN DIRECT VIOLATION OF HEALTH AND SAFETY REQUIREMENTS FOR UNDER GROUNDING UTILITIES IN RANCHO PALOS VERDES, COULD CAUSE A FIRE, ESPECIALLY DURING AN EARTHQUAKE. ALL OTHER POWER LINES IN THE AREA ARE PLACED ON A "FIRE ROAD".	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #65 related to Public Services - Fire Protection.</p>
COMMENT KS #115	RESPONSE KS #115
NO ELECTRIC LINES SHOULD SPAN OVER A KNOW GNATCATCHER HABITAT.	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #61 related to undergrounding of utilities.</p>
COMMENT KS #116	RESPONSE KS #116
SEWER DEMAND COULD INCREASE SUBSTANTIALLY IF DISCHARGE WATER FROM ACLAD/RDA PIPES ARE REQUIRED TO BE DISCHARGED INTO A SEWER SYSTEM AND NOT DIRECTLY INTO THE BEACH AREA DUE TO POOR QUALITY OF WATER. THIS EIR SHOULD ADDRESS THIS ISSUE.	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The RDA staff does not anticipate the need to discharge to the sewer system.</p>
COMMENT KS #117	RESPONSE KS #117
POTENTIAL MOSQUITO INFESTATION WHEN KELVIN CANYON SPRING FLOW SLOWS DOWN WILL CAUSE POCKETS OF WATER FOR BREEDING. NORMAL FLOW OF SPRING DOESN'T ALLOW WATER TO STAGNATE. A SOMETIMES FATAL DISEASE CALLED DESQUE FEVER, CAUSING INTERNAL BLEEDING, COMA AND SHOCK, WAS INTRODUCED INTO THE U.S. FROM MEXICO BY MOSQUITO AND CAN BE DEADLY.	Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.

4.0 Responses to Comments

COMMENT KS #118	RESPONSE KS #118
<p>Let's move the well site to the new Hon well, provide water for the animals and specific willow and walnut trees, protect my water rights without a document recorded against my property and move ahead. To safeguard the kids, it is important that the discharge water at the beach be checked. Wasting any more money on Monahan well is not fair to the people who have to pay their liens.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>
COMMENT KS #119	RESPONSE KS #119
<p>The staff recommendation to continue the project of dewatering the Kelvin Canyon Spring by pumping the Monohan well is flawed.</p> <p>The project will be far more expensive than the \$10,000.00 which your staff has estimated. The dewatering of the Monahan well will devastate a blue line stream as noted in the EIR for Altamira Canyon Drainage Control Project and may bring the U.S. Army Corp of Engineers into the RPV Agency business.</p> <p>Holding this project until a decision is made regarding the "Horan" lien money will not effect the Abalone Cove landslide mass. Going ahead with the project, budgeting only \$10,00.00 for a project which have at least \$35,000.00 budgeted, will have an adverse effect on wetlands and may expose the city and agency to litigation.</p> <p>The EIR must address alternatives to the planned project. The mitigation for destroying the only remaining wetlands on the south side of the Peninsula will be costly. In additional taking water rights form a riparian user may increase the expense of this project.</p> <p>Dr. Elig and Mr. Griffin, among others, have been after Kelvin Canyon stream for years. If pumping out the well is an emergency, Dr. Elig would have moved to take the spring in the 1980's.</p> <p>Please postpone this project for a few months until the entire picture of what the Agency will be doing can be evaluated.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>This comment letter was attached to ACWCP 6 letter.</p> <p>The CEQA related issues raised in this letter were addressed in the Draft EIR.</p>

**COMMENTS AND RESPONSES RECEIVED
DURING THE RREIR PUBLIC REVIEW PERIOD
RREIR ACWCP #6**

REGIONAL INFORMATION CENTER

RREIR COMMENT RIC #1	RREIR RESPONSE RIC #1
<p>Thank you for submitting the above referenced draft revised and recirculated EIR to our office for review. I concur with your assessment that all but the "No Project/No Development" option will have the same or greater level of impacts to cultural resources as the project itself. The areas in questionnaire considered sensitive for cultural resources and archaeological sites are know for the project vicinity.</p> <p>If this office can be of further assistance, please let us know.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

RREIR ACWCP #7

DEPARTMENT OF THE ARMY

RREIR COMMENT DOA #1	RREIR RESPONSE DOA #1
<p>It has come to our attention that you plan to construct/repair a monitoring well and associated structures near Abalone Cove in the City of Rancho Palos Verdes, Los Angeles County, California. This activity may require a U.S. Army Corps of Engineers permit.</p> <p>A Corps of Engineers permit is required for:</p> <p>a) structures or work in or affecting “navigable waters of the United States” pursuant to Section 10 of the Rivers and Harbors Act of 1899. Examples include, but are not limited to,</p> <ol style="list-style-type: none"> 1. constructing a pier, revetment, bulkhead, jetty, aid to navigation, artificial reef or island, and any structures to be placed under or over a navigable water; 2. dredging, dredge disposal, filling and excavation; <p>b) the discharge of dredged or fill material into, including any redeposit of dredged material within, “waters of the United States” and adjacent wetlands pursuant to Section 404 of the Clean Water Act of 1972. Examples include, but are not limited to.</p> <ol style="list-style-type: none"> 1. creating fills for residential or commercial development, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossing, backfilling for utility line crossings and construction outfall structures, dams, levees, groins, weirs, or other structures; 2. mechanized land clearing, grading which involves lifting low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the United States; 3. allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the United States; 4. placing pilings when such placement has or would have the effect of a discharge of fill materials; 	<p>To the extent that the proposed project will impact waters under the jurisdiction of the Army Corp of Engineers, Mitigation Measure 6 has been provided to reduce this impact to a less than significant level. The measure requires notification to the Army Corp of Engineers and approval as noted below.</p> <p>Mitigation Measure 6 provides:</p> <ol style="list-style-type: none"> 6. Prior to construction, project specifications shall be established requiring notification to United States Army Corp of Engineers (COE) and California Department of Fish and Game (CDF&G) and approval from these agencies to mitigate potential impacts as a result of the project to a level of insignificance. <p><i>The notification shall include the findings of surveys accomplished within a reasonable time of the notification for the following:</i></p> <ol style="list-style-type: none"> 1. Palos Verdes blue butterfly; 2. Palos Verdes blue butterfly foodplants; 3. Pacific pocket mouse; and 4. California gnatcatchers. <p>Compliance with this measure shall be verified by the Director of Public Works.</p>

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c). any combination of the above.

Enclosed you will find a permit application form and a pamphlet that describes our regulatory program. If you have any questions, please contact me at (213) 452-3413.

RREIR ACWCP #8

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

RREIR COMMENT SCAG #2	RREIR RESPONSE SCAG #2
<p>We have reviewed the above referenced document and determined that it is not regionally significant per Areawide Clearinghouse criteria. Therefore, the project does not warrant clearinghouse comments at this time. Should there be a change in the scope of the project, we would appreciate the opportunity to review and comment at that time.</p> <p>A description of the project was published in the April 15, 1997 Intergovernmental Review Report for public review and comment.</p> <p>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) 236-1833 or Bill Boyd at (213) 236-1960.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

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RREIR ACWCP #9

COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

RREIR COMMENT CSDLAC #2	RREIR RESPONSE CSDLAC #2
<p style="text-align: center;"><u>Abalone Cove Well Conversion Project</u></p> <p>The County Sanitation Districts of Los Angeles County (Districts) received a <u>Draft Environmental Impact Report</u> for the subject property on April 1, 1997. The proposed development is located within the jurisdictional boundaries of District No. 5. We offer the following comment regarding sewerage service:</p> <ul style="list-style-type: none"> • The Districts maintain facilities within the project area; however, they will not be affected. <p>If you have any questions, please contact the undersigned at (562) 699-7411, extension 2717.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please note that the proposed project does not require sewer service.</p>

RREIR ACWCP #10

MS. KATHY SNELL

<p>RREIR COMMENT KS #120</p>	<p>RREIR RESPONSE KS #120</p>
<p>Page 1, Purpose and Contents</p> <p>THE CITY AND RDA HAVE WITHHELD INFORMATION FROM VISTA WHICH HAS LED TO THE IMPROPER AND INCOMPLETE ASSESSMENT OF THIS PROJECT. THE MEMO WRITTEN BY DR. ELIG SUGGESTING AN ALTERNATIVE WELL IS ONLY ONE EXAMPLE OF THE INFORMATION WHICH HAS BEEN WITHHELD FROM VISTA. THE DRAFT RREIR DOES NOT ADEQUATELY DISCUSS POSSIBLE WAYS TO REDUCE OR AVOID POTENTIAL SIGNIFICANT ENVIRONMENTAL IMPACTS.</p>	<p>The City has provided VISTA, the City's environmental consultant, with all information necessary to prepare the EIR (personal communication: Department of Public Works staff - June 11, 1997).</p>
<p>RREIR COMMENT KS #121</p>	<p>RREIR RESPONSE KS #121</p>
<p>"...various methods taken by the RDA to provide public review and receive public comment..."</p> <p>HAVING A DEWATERING WELL SO FAR AWAY FROM AND EAST OF THE FORMER "ABALONE COVE" LANDSLIDE IS MOTIVATED BY THE DESIRE TO USE "HORAN" MONIES TO MITIGATE THE ACTIVE "PORTUGUESE BEND" SLIDE. AT LEAST 50% OF THE \$100,000,000+, WHICH THIS PROJECT HAS COST, SHOULD BE CHARGED TO THE PORTUGUESE BEND SLIDE BUDGET AS MUCH OF THE WATER PUMPED OUT OF THESE WELLS WOULD FLOW UNDERGROUND TOWARD INTO THE PORTUGUESE BEND SLIDE IF NOT REMOVED. REFERENCE DR. ELIG'S MEMO WHICH STATES THAT DEWATERING THESE WELL WILL KEEP GROUND WATER FROM ENTERING THE ACTIVE PORTUGUESE BEND SLIDE. THIS PROJECT DOES NOT MEET THE PROJECT DESCRIPTION (#15).</p>	<p>The funding of the improvements is not a CEQA issue. The proposed project is as described in the EIR. No further response is required.</p>
<p>RREIR COMMENT KS #122</p>	<p>RREIR RESPONSE KS #122</p>
<p>Page 2, General Purpose "The EIR addresses the potential environmental impacts..."</p> <p>THE EIR FAILS TO ADDRESS THE IMPACT TO VEGETATION DOWNHILL BY LOWERING GROUND WATER UP SLOPE. MITIGATION MUST BE DISCUSSED.</p>	<p>The goal of the RDA for the project is to not effect pepper trees in the subject area. Pepper trees are not described as a significant biological resources in the EIR based on the criteria established by CEQA, the CEQA Guidelines, and Local CEQA Guidelines.</p> <p>Existing information available does not indicate that pepper</p>

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	<p>trees will be impacted by the proposed project. The RDA staff has indicated that should it be demonstrated with certainty that the proposed project after operational effects pepper trees in the area the following actions will be taken:</p> <ol style="list-style-type: none"> 1. Operation of the dewatering well will be temporarily suspended. 2. A watering system will be installed to effected pepper trees. 3. The proposed project will be reactivated and the pepper trees will be monitored.
<p>RREIR COMMENT KS #123</p>	<p>RREIR RESPONSE KS #123</p>
<p>Page 5, Introduction "...to evaluate the environmental effects..."</p> <p>THIS DOCUMENT IS INADEQUATE BECAUSE IT FAILS TO EVALUATE THE GROUND WATER LEVELS NEEDED TO SUSTAIN THE HUNDREDS OF PEPPER TREES AND VARIOUS DEEP ROOTED TREES DOWN SLOPE FROM THE PROPOSED WELL.</p>	<p>Please refer to response to comment KS #122 related to pepper trees.</p>
<p>RREIR COMMENT KS #124</p>	<p>RREIR RESPONSE KS #124</p>
<p>Page 6, Introduction</p> <p>"The Ceqa Guidelines Section 15126 (d) require that an EIR ...which could reasonably attain most of the basic objectives of the project..."</p> <p>The project description: "The implementation of improvement to lower the groundwater level in the Abalone Cove Landslide area."</p> <p>DR. ELIG HAS WRITTEN THAT DEWATERING THE "ABALONE COVE" WELL AND/OR THE HON WELL WILL PREVENT GROUND WATER FROM ENTERING THE PORTUGUESE BEND SLIDE. THE CITY SHOULD PRODUCE DR. ELIG'S CORRESPONDENCE FOR EVALUATION BY VISTA FOR THIS EIR. AN ANALYSIS OF THE PATH OF THE GROUND WATER SHOULD BECOME A PART OF THIS EIR TO ENSURE THAT THE PROPOSED PROJECTS MEET THE PROJECT DESCRIPTION.</p>	<p>Please refer to response to comment KS #122 related to availability of material.</p>
<p>RREIR COMMENT KS #125</p>	<p>RREIR RESPONSE KS #125</p>
<p>Page 7 , Summary of Alternatives</p> <p>Alternative 1: "No Project/No Development;</p>	<p>Under the No Project/No Development, the proposed project would not be implemented.</p>

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<p>Environmentally Superior, No..."</p> <p>THE "NO PROJECT" CHOICE IN A HIGH FIRE HAZARD AREA AND ON UNDEVELOPED LAND IS ENVIRONMENTALLY SUPERIOR. ALL PRODUCING WELLS SHOULD BE IN DEVELOPED AREAS AND NOT POSE A THREAT TO RESIDENCES AND THE ENVIRONMENT.</p>	<p>The existing monitoring well would continue to function in the same manner as it currently is operated. No improvements would be made to the well (RREIR, page 7).</p> <p>The RREIR indicates that the No Project/No Development Alternative is technically feasible.</p> <p>All alternatives are economically feasible. The proposed project and all alternative other than the "No Project/No Development Alternative" require property owner cooperation (RREIR, page 7).</p> <p>The No Project/No Development Alternative does not meet the project objectives. The alternative remains under consideration by decision makers.</p> <p>The EIR indicates that the No Project/No Development Alternative is an environmentally superior alternative.</p> <p>The No Project/No Development Alternative would result in continued geology/landslide instability (RREIR, page 21).</p> <p>The potential fire risk from the proposed project can be mitigated. Additionally, the County of Los Angeles - Fire Department has previously commented that no adverse impacts are anticipated.</p> <p>Please refer to Responses to Comments #64, #65, and #66.</p> <p>The RDA does not require that all producing wells be placed in developed areas. The proposed project site and several of the alternatives were selected by the City's Geologist to achieve project objectives, which can not be achieved in adjacent developed areas. The RDA has producing wells in predominately undeveloped areas.</p>
<p>RREIR COMMENT KS #126</p> <p>Alternative 2 - Site 1</p> <p>"Alternative Site 1 would require drilling a new well"</p> <p>THERE NOW EXISTS ANOTHER MONITORING WELL JUST WEST OF THE PROPOSED PROJECT SITE DRILLED BY MONAHAN.</p>	<p>RREIR RESPONSE KS #126</p> <p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>
<p>RREIR COMMENT KS #127</p> <p>Page 9, alternative 2 Other Well Locations - Hon Well Site"</p>	<p>RREIR RESPONSE KS #127</p> <p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

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"A discharge pipeline will be extended from the well to an existing discharge line approximately 3,500 feet to the south.

EXTENDING THE DISCHARGE PIPELINE 3,500 SOUTH IS NOT THE CORRECT DISCHARGE PATH. THE DISCHARGE PIPE SHOULD FOLLOW THE SAME ROUTE AS DESCRIBED ON PAGE 8, ALTERNATIVE 2, SITE 2.

IN ADDITION, "...3,500 FEET SOUTH..." IS REALLY EAST INTO THE PORTUGUESE BEND SLIDE. IF ABALONE COVE WATER IS GOING TO BE PUMPED INTO THE ACTIVE PORTUGUESE BEND SLIDE, THE DISCHARGE PIPES WILL BE SUBJECT TO FAILURE DUE TO SLIDE MOVEMENT. THE DANGERS OF WATER POURING INTO PORTUGUESE BEND SLIDE SHOULD BE EVALUATED IN THIS EIR.

THE DISCHARGE PIPE USED FOR DEWATERING KELVIN CANYON SPRING SHOULD BE ROUTED DOWN THE FIRE ROAD RUNNING ON THE EAST SIDE OF THE CANYON TO THE EXISTING NARCISSA/VANDERLIP DISCHARGE LINE WHICH IS LOCATED ON STABLE LAND.

PROVIDING THAT THE DISCHARGE PIPE IS INSTALLED "...3,500 FEET TO THE SOUTH...(REALLY EAST), THE DISCHARGE LINE WILL BE PLACED IN AN ACTIVE LANDSLIDE AREA OF A THE PORTUGUESE BEND SLIDE. THE AREA THE PIPE IS PROPOSED TO RUN, ALTERNATIVE 2-HON WELL, JUST RECENTLY SUFFERED A MAJOR LAND FAILURE WHICH RESULTED IN THE EXISTING DISCHARGE PIPE BREAKING. THE WELL WATER FROM THE PIPE Poured INTO DEPRESSIONS IN THE EARTH AND FURTHER AGGRAVATED THE ACTIVE PORTUGUESE BEND SLIDE. WELLS HAD TO BE TURN OFF UNTIL THE PIPE COULD BE MOVED.

UNLESS THE ROUTE OF THE HON DISCHARGE PIPE IS CHANGED TO RUN TO NARCISSA/VANDERLIP. THIS EIR IS INCOMPLETE BECAUSE THE ENVIRONMENTAL RISK OF PIPING WELL WATER INTO A VERY ACTIVE LANDSLIDE FROM A STABLE AREA HAS NOT BEEN EVALUATED. FURTHER, THE EIR IS INCOMPLETE BECAUSE RIPARIAN USERS WILL NOT HAVE ACCESS TO THE WATER AS DISCUSSED IN THE DRAFT EIR.

The location for the discharge pipeline suggested by the commentator is the route described on page 8 of the RREIR as Alternative 2, Site 2. Neither the proposed project location or the location suggested by the commentator would have any significant environmental effects that could not be mitigated to a less than significant level.

The existing pipe is inspected on a weekly bases. The proposed discharge will be inspected on a weekly bases. The location where the Hon Well Alternative joins the existing 2-inch PVC pipe that outlets the Ocean is indicated on Exhibit 22 Revised. The 2-inch PVC pipe that outlets to the ocean has been in place for over five (5) years.

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<p>RREIR COMMENT KS #128</p> <p>IF FUNDED BY THE HORAN LIEN MONIES, THE HON WELL DISCHARGE LINE, LIKE SITE 2, SHOULD BE ROUTED TO NARCISSA/VANDERLIP EXISTING LINE TO PLAN FOR FUTURE DEWATER WELL IN ACLAD/HORAN/ABALONE COVE LANDSLIDE AREA.</p>	<p>RREIR RESPONSE KS #128</p> <p>Please refer to responses to comments KS #121 related to Horan lien monies and KS # 127 related to the location of the discharge line.</p>
<p>RREIR COMMENT KS #129</p> <p>TO REDUCE AND ELIMINATE THE SIGNIFICANT ENVIRONMENTAL EFFECTS, THE WELL WATER CAN BE THE SOURCE OF "WATERING HOLES" ALONG THE SIDE OF THE CANYON FOR THE USE OF THE RIPARIAN USERS. USING WELL WATER TO SUPPLY WILDLIFE WATERERS SHOULD BE DISCUSSED AS MITIGATION FOR THE DRYING UP THE KELVIN CANYON SPRING WHICH HAS PROVIDED WATER FOR HUNDREDS OF YEARS. WITH THE NEW HON DRAIN PIPE ROUTE, THE RREIR HAS FAILED TO DISCUSS MITIGATING THE LOSS OF WATER FROM A BLUE LINE STREAM.</p>	<p>RREIR RESPONSE KS #129</p> <p>Please refer to response to comment KS #28, KS #58, and KS #71 related to biological resource impacts.</p>
<p>RREIR COMMENT KS #130</p> <p>Page 11, Alternative 4, Alternative Access - Kelvin Canyon</p> <p>"The well could be accessed from a roadway constructed across Kelvin Canyon."</p> <p>IT IS IMPASSABLE WITHOUT CONSTRUCTING A BRIDGE.</p> <p>TECHNICALLY FEASIBLE, NO. ECONOMICALLY FEASIBLE, NO.</p>	<p>RREIR RESPONSE KS #130</p> <p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Alternative 4, Alternative Access Kelvin Canyon would be developed by the construction of an all weather road across the Kelvin Canyon streambed (RREIR, page 33 and Exhibit 23, page 34).</p> <p>The construction of an all weather access road is technically feasible. The project could be accessed across Kelvin Canyon without an all weather road on foot or by all terrain vehicle (ATV).</p>
<p>RREIR COMMENT KS #131</p> <p>Alternative 5, Altamira Watershed Pipeline</p> <p>THE RESIDENTIAL DEVELOPMENTS ABOVE THE PROJECT AREA, VALLEY VIEW, DEL CERRO, AND ISLAND VIEW ARE ALREADY DRAINING INTO ALTAMIRA CANYON. ALL THAT IS NEEDED IS TRANSPORT THEIR RUNOFF TO THE OCEAN IS: A PIPE PLACED ALONG SIDE OF ALTAMIRA CANYON; A CONNECTION TO THE SEWER; OR , A PIPE DISCHARGING WATER ONTO CREST. NO RESIDENTIAL HOOKUPS ARE NEEDED. NO</p>	<p>RREIR RESPONSE KS #131</p> <p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

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<p>TRENCHING THE CANYON IS NEEDED. KEEP IT SIMPLE.</p>	
<p>RREIR COMMENT KS #132</p> <p>Page 12, Alternative 6 Multiple Well Sites - Abalone Cove and Hon</p> <p>“...periodic maintenance of the discharge line...”</p> <p>IF THE LINE IS PLACED “3,500 FEET SOUTH” (EAST) OF HON WELLS, CONTINUAL MAINTENANCE AND DAILY INSPECTION WILL BE NECESSARY DUE TO THE ACTIVE PORTUGUESE BEND LANDSLIDE. IF THE LINE IS RUN ON STABLE LAND SOUTH TO THE NARCISSA/VANDERLIP WELL, “PERIODIC” MAINTENANCE WILL BE MORE THAN ADEQUATE. ONLY YEARLY INSPECTIONS WILL BE NECESSARY.</p> <p>IF THE POWER LINES ARE EXTENDED OVER KELVIN CANYON, THE EDISON WILL FIND IT VERY DIFFICULT, IF NOT IMPOSSIBLE, TO INSPECT THE LINES.</p>	<p>RREIR RESPONSE KS #132</p> <p>Please refer to response to comment KS #125 related to the location of the discharge line.</p> <p>The Public Works Department staff has indicated that they do not anticipate any difficulty with the maintenance and inspection of the discharge line (pers. comm. Public Works Department staff).</p> <p>Power lines over Kelvin Canyon can be visually inspected (pers. comm. Public Works Department staff).</p>
<p>RREIR COMMENT KS #133</p> <p>Page 14, Alternatives Summary of Impacts</p> <p>“NO PROJECT” WILL ELIMINATE THE IMPACT. THE HON WELL AND SITE 2 WILL RESULT IN LESS IMPACT THAN THE PROPOSED PROJECT BECAUSE THE POWER POLES ARE LOCATED ON AND NEXT TO A FIRE ROAD. SOLAR WILL HAVE LESS IMPACT.</p> <p>ALTERNATIVE 4 ACCESS OVER KELVIN CANYON WILL HAVE A GREATER IMPACT THAN THE PROPOSED PROJECT.</p>	<p>RREIR RESPONSE KS #133</p> <p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The EIR indicates that the “No Project/No Development Alternative” will not obtain project objectives.</p> <p>Please refer to response to comment KS #4 and KS #66 related to Public Service - Fire impacts.</p>
<p>RREIR COMMENT KS #134</p> <p>HON 6 WILL INCREMENTALLY INCREASE THE DEMAND FOR FIRE PROTECTION OVER THE PROPOSED PROJECT.</p> <p>A FIRE WAS STARTED AT DEL CERRO PARK AND BURNED DOWN TO THE PROJECT WELL SITE. THE FIRE DEPARTMENT HAD DIFFICULTY FIGHTING THE FIRE ON THE FACE OF THE CLIFF. THE WATER DROPPING HELICOPTERS WERE CALLED</p>	<p>RREIR RESPONSE KS #134</p> <p>Please refer to response to comment KS #4 and KS #66 related to Public Service - Fire impacts.</p>

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<p>OUT TO FIGHT THE FIRE. L.A. COUNTY HAS NOW ENDED THE LEASE OF THESE HELICOPTERS. FURTHER FUNDING CUTS ARE EXPECTED TO IMPACT THE LOCAL FIREHOUSES. THE HON WELL SITE IS LOCATED OFF OF A FIRE ROAD. ALL WELLS SHOULD BE LOCATED ON A FIRE ROAD OR IN AN ACCESSIBLE AREA. THE PROJECT SITE IS NOT REASONABLE ACCESSIBLE.</p>	
<p>RREIR COMMENT KS #135</p> <p>Page 16</p> <p>ALTERNATIVE 1, "NO PROJECT" WILL ELIMINATE THE IMPACT OF EXISTING BIOLOGICAL RESOURCES AND THE GNATCATCHER.</p> <p>SITE 1: 3 /3 (WELL MUST BE DUG)</p> <p>HON 6: 3/3 (MORE WELLS=GREATER IMPACT)</p>	<p>RREIR RESPONSE KS #135</p> <p>Please refer to response to comment KS #28, KS #58, and KS #71 related to biological resource impacts.</p> <p>The EIR indicates that the "No Project/No Development Alternative" will not obtain project objectives.</p>
<p>RREIR COMMENT KS #17</p> <p>PAGE 18</p> <p>"...incremental contribution to these impacts is not considered significant except for impacts to the open channel habitat/stream bed with riparian element's habitat located in Kelvin Canyon."</p> <p>THE BIOLOGICAL RESOURCES WHICH WILL BE IMPACTED FAR EXTEND BEYOND THE CHANNEL OF THE STREAM BED. DEEP ROOTED TREES LOCATED BELOW THE STREAM DOWN TO THE OCEAN DEPEND ON THE WATER SOURCE.</p>	<p>RREIR RESPONSE KS #17</p> <p>Please refer to response to comment KS 122 related to pepper trees.</p> <p>Please refer to response to comment KS #28, KS #58, and KS #71 related to biological resource impacts.</p>
<p>RREIR COMMENT KS #137</p> <p>PEPPER TREES AND OTHER DEEP ROOTED TREES ARE NOW IN DISTRESS DUE TO THE LOSS OF GROUND WATER.</p>	<p>RREIR RESPONSE KS #137</p> <p>Please refer to response to comment KS 122 related to pepper trees.</p>
<p>RREIR COMMENT KS #138</p> <p>A BIOLOGICAL EXPERT SHOULD BE EMPLOYED TO MONITOR THE AMOUNT OF GROUND WATER REMOVED FROM THE ENTIRE ABALONE COVE ABATEMENT DISTRICT AND THE DEWATERING IMPACTS ON THE ENVIRONMENT. THE RDA AND ACLAD BOTH OPERATE DEWATERING WELLS. THE CUMULATIVE IMPACT FROM THE REMOVAL OF GROUND WATER CAUSES AN AVOIDABLE</p>	<p>RREIR RESPONSE KS #138</p> <p>Please refer to response to comment KS 122 related to pepper trees.</p> <p>Please refer to response to comment KS #28, KS #58, and KS #71 related to biological resource impacts.</p>

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<p>RREIR COMMENT KS #142 Page 26 Alternative 2</p> <p>THE DRAFT EIR FAILS TO IDENTIFY AN ALTERNATIVE SITE FOR A WELL WHICH WOULD BE ENVIRONMENTALLY SUPERIOR TO THE PROJECT SITE AND OTHER WELL LOCATIONS. DEVELOPING A WELL IN A RESIDENTIAL AREA NEAR A POWER POLE DOWN SLOPE FROM THE KELVIN CANYON SPRING WOULD BE THE SAFEST LOCATION FOR ALL CONCERNED. WELLS ON THE UNDEVELOPED HILLSIDE CAN BECOME OPERATIONAL AT A LATER DATE WHEN DEVELOPMENT TAKES PLACE.</p>	<p>RREIR RESPONSE KS #142</p> <p>Please refer to response to comment KS #125 related to residential locations for the proposed project.</p>
<p>RREIR COMMENT KS #143 Exhibit 22 Revised</p> <p>THIS EXHIBIT IS INCOMPLETE. THERE IS A DIRT ROAD AND A TRAIL WHICH WOULD PROVIDE A ROUTE FOR DISCHARGE PIPE FROM THE HON WELL AND ALTERNATIVE SITE 2 TO NARCISSA/ VANDERLIP. THIS ROUTE WOULD ALLOW THE DISCHARGE PIPE ON STABLE LAND IS ENVIRONMENTALLY SUPERIOR.</p> <p>THE PROPOSED ROUTE FOR THE PIPE SHOWN IN THE EXHIBIT TO THE WATER TANK ROUTES THE WATER OVER A HILL WHICH FAILED AND CAUSED DRAIN WATER TO ENTER THE ACTIVE PORTUGUESE BEND SLIDE.</p> <p>ALSO, THE DISCHARGE LINE FROM THE PROPOSED PROJECT CAN BE UNDERGROUND (4-5 INCHES) OR COVERED AT THE PROPOSED ROUTE ABOVE GROUND. RUNNING THE PIPE BELOW GROUND IN KELVIN CANYON STREAM BED IS PROPOSED BUT HAS NOT BEEN ENVIRONMENTALLY EVALUATED AND WOULD RESULT IN A MAJOR IMPACT TO THE ENVIRONMENT.</p> <p>THE EXHIBIT IS INCOMPLETE BECAUSE IT DOES NOT SHOW PROPOSED PVC PIPE FOR ALTERNATIVE SITE 2.</p>	<p>RREIR RESPONSE KS #143</p> <p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment KS #127 related to the location of the discharge pipeline.</p>

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<p>RREIR COMMENT KS #144</p> <p>Page 28 Hon Well Site</p> <p>THE DISCHARGE PIPE USED FOR DEWATERING KELVIN CANYON SPRING SHOULD BE ROUTED DOWN THE FIRE ROAD RUNNING ON THE EAST SIDE OF THE CANYON TO THE NARCISSA/VANDERLIP DISCHARGE LINE WHICH IS LOCATED ON STABLE LAND. (SAME AS ALTERNATIVE SITE 2).</p> <p>PROVIDING THE DISCHARGE PIPE IS INSTALLED "3,500 FEET TO THE SOUTH" (REALLY EAST), THE DISCHARGE LINE IS PROPOSED TO BE PLACED IN AN ACTIVE LANDSLIDE AREA OF THE PORTUGUESE BEND SLIDE. THE PIPE IS PROPOSED TO RUN FROM THE HON WELL SITE THROUGH AN AREA WHICH SUFFERED A MAJOR LAND FAILURE ON JANUARY 5, 1995. THE COLLAPSING CLIFF CAUSED THE EXISTING DISCHARGE LINE TO BREAK. THE WELL WATER FROM PIPE ENTERED DEPRESSIONS IN THE EARTH. THE WELLS CONNECTED TO THE BROKEN PIPE HAD TO BE TURNED OFF UNTIL THE LINE COULD BE REPAIRED AND RELOCATED.</p>	<p>RREIR RESPONSE KS #144</p> <p>Please refer to response to comment KS # 143 related to discharge pipeline for the Hon Well Alternative.</p>
<p>RREIR COMMENT KS #145</p> <p>THE EXISTING DEWATERING PIPE IS SAID TO DISCHARGE WELL WATER INTO HALF ROUNDS APPROXIMATELY 300 YARDS ABOVE PALOS VERDES DRIVE SOUTH. THE HALF ROUNDS LEAK INTO THE ACTIVE PORTUGUESE BEND SLIDE. ADDITIONAL WELL WATER WILL THREATEN THE STABILITY OF PALOS VERDES DRIVE SOUTH, THE ONLY THOROUGHFARE ON THE SOUTH SIDE OF THE PENINSULA.</p>	<p>RREIR RESPONSE KS #145</p> <p>Please refer to response to comment KS # 143 related to discharge pipeline for the Hon Well Alternative.</p>
<p>RREIR COMMENT KS #146</p> <p>LOIS LARUE WORKED FROM 1988 TO 1995 BEFORE SHE CONVINCED THE RDA TO TAKE THE WELL WATER OUT OF THE HALF ROUNDS. THE SLIDE AREA, IN PLACES, IS SAID TO BE MOVING UP TO ONE INCH PER DAY.</p>	<p>RREIR RESPONSE KS #146</p> <p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The discharge pipeline for the Hon Well Alternative will not drain to a half-round drain.</p>
<p>RREIR COMMENT KS #147</p> <p>THIS DRAFT RREIR IS INCOMPLETE BECAUSE THE ENVIRONMENTAL RISK OF PIPING THE WELL WATER INTO AN EXISTING PIPE WHICH IS SAID TO</p>	<p>RREIR RESPONSE KS #147</p> <p>Please refer to response to comment KS # 127 related to discharge pipeline for the Hon Well Alternative. The discharge pipeline for the Hon Well Alternative will not</p>

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DISCHARGE INTO A HALF-ROUND DRAIN LEAKS INTO THE VERY ACTIVE PORTUGUESE BEND LANDSLIDE HAS NOT BEEN EVALUATED.	drain to a half-round drain.
RREIR COMMENT KS #148	RREIR RESPONSE KS #148
THE HON WELL, IF FUNDED BY THE HORAN LIEN MONIES, SHOULD BE ROUTED LIKE ALTERNATIVE SITE 2 WELL IS TO NARCISSA/VARNDESLIP EXISTING OUTLET. ROUTING THE PIPE THIS WAY WILL ALSO ALLOW FOR FUTURE DEWATERING WELLS IN ACLAD/HORAN/ABALONE COVE LANDSLIDE AREA.	Please refer to response to comment KS # 127 related to the discharge pipeline for the Hon Well Alternative.
RREIR COMMENT KS #149	RREIR RESPONSE KS #149
THE PROPOSED PIPE SHOULD BE LARGE ENOUGH TO ALLOW FOR ADDITIONAL WELLS TO BE CONNECTED AT A LATER DATE.	Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.
RREIR COMMENT KS #150	RREIR RESPONSE KS #150
Page 29, 2. Aesthetics SITE 2 IS LOCATED ON THE EAST SIDE OF KELVIN CANYON. REMOVING GROUND WATER WOULD IMPACT THE ENTIRE CANYON AND THE ENTIRE AREA REACHING TO THE BEACH.	Please refer to response to comment KS # 122 related to removal of ground water.
RREIR COMMENT KS #151	RREIR RESPONSE KS #151
4. Public services-Fire Protection SITE 2 AND THE HON WELL ALTERNATIVES ARE MORE ACCESSIBLE FOR FIREFIGHTERS IN THE EVENT THE POWER LINES SPARK A FIRE. POWER LINES WILL NOT HAVE TO CROSS OVER THE DEEP KELVIN CANYON. THE EDISON COMPANY WILL HAVE BETTER ACCESS TO THE READ THE METER AT THE HON AND SITE 2 LOCATIONS.	Please refer to responses to comments KS #4, KS #61, KS #64, KS #66 related to underground utilities and fire impacts.
RREIR COMMENT KS #152	RREIR RESPONSE KS #152
C. Status of Alternative ASPECTS OF THE HON WELL SITE ARE ENVIRONMENTALLY LESS DESTRUCTIVE TO THE PROPOSED PROJECT; HOWEVER, THE DISCHARGE MUST TRAVEL IN A CLOSED PIPE ON STABLE LAND ALL OF THE WAY TO THE OCEAN. THE	Please refer to response to comment KS # 143 related to discharge pipeline for the Hon Well Alternative. There are no Federal, State, or Local Agency requirements that the water travel in a closed pipe or on stable land all the way to the Pacific Ocean. The proposed project does not plan to place the discharge line underground in a streambed.

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<p>DISCHARGE LINE SHOULD NOT BE PLACED UNDERGROUND IN A STREAM BED!</p>	
<p>RREIR COMMENT KS #153 Page 30-31 Power Source</p> <p>THE CITY OF RANCHO PALOS VERDES, FOR HEALTH AND SAFETY REASONS, REQUIRE THAT ALL POWER LINES BE PLACED UNDERGROUND. THIS EIR HAS FAILED TO EVALUATE THE IMPACT FROM UNDERGROUND FROM DEL CERRO PARK DOWN A STEEP MOUNTAIN FACE.</p> <p>IT SHOULD BE NOTED THAT, IN HIGH WIND AREAS LIKE THE PROJECT SITE, POWER LINES CAN ARC AND CAUSE A FIRE. AN ARCHING POWER LINE CAUSED THE MALIBU FIRE A YEAR OR SO AGO.</p>	<p>RREIR RESPONSE KS #153</p> <p>Please refer to responses to comments KS #4, KS #61, KS #64, KS #66 related to underground utilities and potential fire impacts.</p>
<p>RREIR COMMENT KS #154 Page 33, Alternative Access</p> <p>CURRENTLY, THERE IS A STEEP, TREACHEROUS, NARROW HORSE TRAIL CROSSES KELVIN CANYON RUNNING FROM EAST TO WEST. IT IS IMPOSSIBLE FOR VEHICULAR ACCESS OVER THIS NARROW TRAIL. THIS ALTERNATIVE ACCESS IS NOT TECHNICALLY FEASIBLE.</p> <p>THIS ALTERNATIVE ACCESS IS THE LOCATION OF A INDIAN MIDDEN.</p>	<p>RREIR RESPONSE KS #154</p> <p>Please refer to response to comment KS #3 related to access.</p> <p>Please refer to response to comment KS # 35 related to cultural resources - archaeology.</p>
<p>RREIR COMMENT KS #155 Page 36, Altamira Canyon Pipe</p> <p>THE ALTAMIRA CANYON ALTERNATIVE WOULD STOP THE WATER RUNOFF FROM ENTERING THE HEADLANDS OF THE CANYON. VALLEY VIEW, DEL CERRO AND ISLAND VIEW RESIDENTIAL DRAINS ARE ALREADY IN PLACE. AN ABOVE GROUND AND ABOVE CANYON PIPE RUNNING FROM THE TOP OF ALTAMIRA CANYON TO THE OCEAN WOULD BE REQUIRED TO STOP RESIDENTIAL WATER FROM ENTERING THE CANYON AT THE SOURCE, "BOULDER DAN." THIS WATER DRAINS DAILY FROM HUNDREDS OF HOME. THE WATER DRAINAGE IS NOT LIMITED TO STORM WATER. THE WATER COULD EVEN BE PLACED IN THE SEWER SYSTEM OR ROUTED</p>	<p>RREIR RESPONSE KS #155</p> <p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to the EIR "Altamira Canyon Watershed Alternative" for an evaluation of the alternative .</p>

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<p>WEST DOWN CREST TO HAWTHORNE BLVD., AWAY FROM AN ANCIENT LANDSLIDE AREA.</p> <p>THE ENVIRONMENTAL ASSESSMENT DOES NOT PROPERLY EVALUATE THE IMPACT OF STOPPING ALL WATER GENERATED FROM ISLAND VIEW, DEL CERRO AND VALLEY VIEW FROM ENTERING THE HEADLANDS OF ALTAMIRA CANYON.</p>	
<p>RREIR COMMENT KS #156</p>	<p>RREIR RESPONSE KS #156</p>
<p>Page 48 Power lines and poles</p> <p>“Each power pole will impact an approximately four (4) square feet area.”</p> <p>TO INSTALL FOUR POWERS IN A VERY STEEP CANYON WILL CAUSE THE DESTRUCTION OF HUNDREDS OF SQUARE FEET, NOT 4 SQUARE FEET PER POLE!</p>	<p>Please refer to response to comment KS #28, KS #58, and KS #71 related to biological resource impacts.</p> <p>It is not presently anticipated that the proposed project will cause the permanent loss/destruction of more than 64 square feet of biological resources (4 square feet per pole).</p>
<p>RREIR COMMENT KS #157</p>	<p>RREIR RESPONSE KS #157</p>
<p>Appendix A, Reviewing Agencies</p> <p>THE FOLLOWING AGENCIES SHOULD HAVE REVIEWS THE EIR AND WERE NOT NOTED AS A REVIEWING AGENCY: RECLAMATION AND NATIVE AMERICAN HERITAGE COMMISSION.</p>	<p>Please refer to response to comment KS # 35 related to cultural resources - archaeology.</p> <p>Please refer to ACWPC No. 3 and ACWPC No. 12. These letters indicate regional and statewide distribution and review of the EIR in accordance with CEQA, the State CEQA Guidelines, and Local CEQA Guidelines.</p>

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RREIR ACWCP #7

UNITED STATES DEPARTMENT OF THE INTERIOR

RREIR COMMENT USDI #1	RREIR RESPONSE USDI #1
<p>This letter responds to the proposed Abalone Cove Well Conversion project in the City of Rancho Palos Verdes, California. The U.S. Fish and Wildlife Service (Service) is concerned about the possible effects of the project on wetlands, the endangered Palos Verdes blue butterfly (<i>Claucopsyche lygdamus palosverdesensis</i>) (butterfly), the endangered Pacific pocket mouse (<i>Perognathus longimembris pacificus</i>) (mouse), the threatened California gnatcatcher (<i>Polioptila californica californica</i>) (gnatcatcher), animal and plant species of special concern, and fish and wildlife resources. The butterfly, mouse, and gnatcatcher are protected under the Endangered Species Act of 1973, as amended (Act).</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>
RREIR COMMENT USDI #2	RREIR RESPONSE USDI #2
<p>Our comments are based on the <i>Abalone Cove Well Conversion Project Draft Environmental Impact Report</i> dated August 12, 1996, which was received by the Service on May 7, 1997; <i>Abalone Cove Well Conversion Project Draft Revised and Recirculated Draft Environmental Impact Report</i> (DRDEIR) dated April 1, 1997; a memorandum from Perry Ehlig to Les Evans, Director of Public Works for the City of Rancho Palos Verdes, dated June 25, 1996, (Ehlig Memo); <i>California Gnatcatchers, Cactus Wrens, and Conservation of Coastal Sage Scrub on the Palos Verdes Peninsula</i> progress report No. 4 (1996), by Jonathan Atwood, Sophia Tsai, and Amy Miller of the Manomet Observatory; and other information in the Service's files.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>It is the opinion of the City that the potential loss of the stream will not alter or compromise the potential reserve design for the City's NCCP for the following reasons:</p> <ol style="list-style-type: none"> 1. The loss of habitat is negligible; 2. The habitat is not dependent on the stream; 3. Kelvin Canyon will remain as open space connectivity for species; and 4. The stream will remain as an intermittent stream (pers. comm.: Community Development Department staff).
RREIR COMMENT USDI #3	RREIR RESPONSE USDI #3
<p><u>Project Description</u> The proposed project is located in the Kelvin Canyon area in the City of Rancho Palos Verdes, Los Angeles County, California. We understand that the project consists of 1) conversion of an existing monitoring well to a dewatering well, and 2) operation of the dewatering well. Kelvin</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Under the special 4 (d) rule, "take" of California gnatcatcher during the plan preparation is authorized by local jurisdiction through habitat loss permit. Therefore, if any "take" of a</p>

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<p>Canyon is designated as a blue line stream. This area currently supports a mosaic of ruderal, coastal sage, riparian, cactus scrub, grassland and other habitats. These communities provide valuable habitat for migratory and resident birds, mammals, and other animals and plants. The site also likely provides habitat for animal and plant species that are listed under the Act. In addition, there is a spring in Kelvin Canyon.</p>	<p>California gnatcatcher is to occur, the City will apply for a 4 (d) permit, which will be processed in accordance with the NCCP program guidelines. Furthermore, if the permit was obtained, it will be within the five percent (5%) maximum loss of Coastal sage scrub habitat allowed through the NCCP process.</p>
<p>RREIR COMMENT USDI #4</p>	<p>RREIR RESPONSE USDI #4</p>
<p><u>Project Impacts and Mitigation</u></p> <p>Wetland and General Wildlife Resources</p> <p>The proposed project may result in significant adverse indirect and cumulative impacts to native wildlife and their habitats in the Abalone Cove Landslide and Portuguese Landslide areas in the Rancho Palos Verdes. The DEIR and DRDEIR do not fully address the extent of the possible adverse impacts resulting from this proposed project on wildlife, their habitats, and wetlands.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to response to comment KS #28, KS #58, and KS #71 related to biological resource impacts.</p> <p>The opinion of the Service is noted related to biological resource impacts. The EIR address the impacts of the project on Biological Resources on pages 59-67. The EIR provides the following mitigation measures related to biological resources:</p> <p>Mitigation Measures</p> <ol style="list-style-type: none"> 2. Prior to construction, project specifications shall be established providing written proof to the Director of Planning, Building, and Code Enforcement that the construction route of the proposed discharge pipeline will avoid sensitive biological resources. The route of the discharge pipeline will be flagged by a qualified biologist. The biologist will provide field inspection of the pipeline construction to verify that the route has been constructed as flagged. The biologist will submit a written certification of compliance with these routing requirements. Compliance with this measure shall be monitored by the Director of Planning, Building, and Code Enforcement. 3. Prior to construction, project specifications shall be established providing written proof to the Director of Planning, Building, and Code Enforcement that construction will not occur during the breeding season of the California gnatcatcher and San Diego cactus wren. Compliance with this measure shall be monitored by the Director of Planning, Building, and Code Enforcement.

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Additionally, the EIR states the following related to biological resource impacts:

LEVEL OF SIGNIFICANCE

No impacts on significant biological resources are anticipated for the construction of all components (well, discharge pipeline, access, and power poles and lines) of the dewatering well system.

The conversion of the existing monitoring well to operate as a dewatering well will not have an impact on plant or animal species diversity or sensitive species.

No impacts on significant biological resources are anticipated from the construction and equipping of the monitoring well to operate as a dewatering well.

No impacts on significant biological resources are anticipated from the construction and use of the access road.

No biological resource impact is anticipated from the inspection and maintenance of the dewatering well.

The proposed project will have an impact on approximately 64 80 square feet Coastal sage scrub habitat by the construction of power poles. This small direct loss of this habitat is not considered a significant impact.

The operation of the dewatering well system will not have an impact on sensitive plant species.

Implementation of the proposed project would directly or indirectly have an impact on all the animal species on-site in the vicinity of the proposed project. This is not considered a significant impact.

The proposed project will have an impact on biological resources in the project vicinity. Wildlife in the area will be subject to higher noise levels during the construction period, which may cause some species to leave the area, at least temporarily. This is not considered a significant impact the impact is of a short duration and relatively low intensity.

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	<p>The construction of the discharge pipeline will have an impact on existing biological resources. Mitigation Measure 2 has been provided to reduce the impact to a less than significant level.</p> <p>The proposed project could potentially have an impact on the California gnatcatchers. The potential harassment of the California gnatcatcher during construction of the project is considered a significant impact. The impact is mitigated to a less than significant level by Mitigation Measure 3.</p> <p>The potential harassment of the San Diego Cactus wren during construction of the project is considered a potentially significant impact. The impact is mitigated to a less than significant level by Mitigation Measure 3.</p> <p>The operation of the dewatering well system will have an impact on the Open Channel Habitat/Stream Bed With Riparian Elements habitat located in Kelvin Canyon. The proposed project will eliminate the spring and perennial water in the mid-section of Kelvin canyon. This is considered a significant unavoidable adverse impact on biological resources.</p> <p>The proposed project in conjunction with other past, present, and reasonably foreseeable future projects has the potential to contribute to a cumulative impact on biological resources. The projects incremental contribution to these impacts is not considered significant except for impacts to the open channel habitat/stream bed with riparian element's habitat located in Kelvin Canyon. The impact to this habitat is an unavoidable adverse project-specific impact on biological resources.</p>
<p>RREIR COMMENT USDI #5</p>	<p>RREIR RESPONSE USDI #5</p>
<p>Our specific comments and recommendations on the proposed dewatering project and its potential impacts to wildlife and wetlands are as follows:</p> <p>1) Biological impacts resulting from a project should be considered significant if they will a) adversely affect a rare or endangered species of plant or animal or their habitats; b) interfere substantially with the movement of any resident or migratory</p>	<p>Please refer to Response to Comment USDI #4 related to impacts to biological resources.</p> <p>Please refer to response to comment KS #28, KS #58, and KS #71 related to biological resource impacts.</p> <p>Please note that the criteria suggested were utilized in the preparation of the EIR. The EIR on page 59 states:</p>

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<p>fish or wildlife species; and/or c) substantially diminish habitat for native fish, wildlife, or plants. Given these criteria, an the on-going loss and damage to natural habitats in Rancho Palos Verdes and the Palos Verdes peninsula, the direct, indirect, and cumulative impacts to wildlife resulting from the proposed project as defined by in the California Environmental Quality Act Guidelines (CEQA), are likely significant.</p>	<p style="text-align: center;">PROJECT IMPACTS</p> <p>Appendix G of the CEQA Guidelines serves as a guideline/general example of impacts that are normally considered to have a significant effect on the environment. A project would typically have a significant biology impact if it will:</p> <ul style="list-style-type: none"> (c). Substantially effect a rate or endangered species animal or plant or the habitat of the species. (d) Interfere substantially with the movement of any resident or migratory fish or wildlife species. (t) Substantially diminish habitat for fish, wildlife or plants according to Assembly Bill 3158. <p>The above criteria was used to evaluate the potential impacts of the project and cumulative projects. The criteria is substantially the same as the requested criteria.</p>
<p>RREIR COMMENT USDI #6</p>	<p>RREIR RESPONSE USDI #6</p>
<p>Because the Abalone Cove Well Conversion Project will likely have a significant effect on the environment, we recommend that the final environmental document adequately address the direct, indirect, and cumulative impacts to wildlife resources and wetlands, and proposed mitigations resulting from the proposed project, and other interrelated and interdependent project which include the Rancho Palos Verdes Shore Protection Feasibility Study, and the Altamira Canyon Drainage Control Project.</p>	<p>The EIR evaluated past, present and reasonably foreseeable future projects as noted in the Regional and Local Setting Section pages 23 - 28. Direct, indirect, and cumulative biological resource impacts were based upon this Section of the EIR. Additionally, the Biological Assessment included as Appendix B of the EIR the analysis of the Redevelopment Study Area (RDA) as unit comprised of 825 acres.</p>
<p>RREIR COMMENT USDI #7</p>	<p>RREIR RESPONSE USDI #7</p>
<p>2) The Service is concerned about the potential adverse impacts of the proposed project on the spring in Kelvin Canyon (Ehlig Memo, and page 62 of the DREIR). The spring and associated wetland habitats provide important drinking water, foraging, breeding, and resting habitat for native birds, mammals, reptiles, insects, and amphibians. The spring and associated wetland habitats also provide habitat diversity and add to the value of the surrounding uplands. The Service disagrees</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The Service's preference for the retention of the spring, over stabilization of the landslide is noted. The City is required to balance the environmental effects of the proposed project such as the loss of the spring with project benefits such as landslide stabilization in accordance with CEQA. The only alternative identified in the EIR that would not eliminate that spring is the "No Project/No Development" Alternative.</p>

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<p>with the statements in the DEIR ((page 66) that the implementation of the proposed project will not have an adverse impact on sensitive plant or animal species. The Service agrees with the statement in the DEIR (page 67) which states that the operation of the dewatering well will be a significant adverse impact on biological resources as a result of the effects on the spring and surface waters of Kelvin Canyon. In addition, the Ehlig memo states "...there is a strong possibility that the spring in Kelvin Canyon will dry up. Do they want to mitigate the landslides or maintain the spring? If the spring is more important than mitigation the landslides, we should forget our efforts to mitigate the landslides." The elimination or reduction in outflow of water from the spring in Kelvin Canyon likely will have significant impacts on native animals and plants.</p>	<p>The No Project/No Development Alternative will not meet the objectives of the project.</p> <p>Please refer to Responses to Comments USDI #4, USDI #5, and USDI #6, related to impacts to biological resources.</p>
<p>RREIR COMMENT USDI #8</p>	<p>RREIR RESPONSE USDI #8</p>
<p>The Service is especially concerned about the "significant unavoidable impact" on biological resources caused by the loss of the this blue line stream and the spring in Kelvin Canyon given the participation by the City of Rancho Palos Verdes in the Natural Communities Conservation Program (NCCP). The adverse impacts on native wildlife and native vegetation caused by the loss of this blue line stream and associated surface waters may alter or compromise potential reserve designs for the City's NCCP. We recommend that the City develop a plan that adequately mitigates the loss of the spring in Kelvin Canyon prior to certification of the final environmental documents.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment USDI #4, USDI #5, and USDI #6 related to impacts to biological resources.</p> <p>Please refer to response to comment KS #28, KS #58, and KS #71 related to biological resource impacts.</p> <p>The proposed project will not cause the "loss" of a blue line stream. It will eliminate the spring in Kelvin Canyon. The blue line stream will remain and function as other streams of this nature in the City, without a spring. The spring has been observed to be dry for a substantial portion of the year (VISTA and City staff).</p>
<p>RREIR COMMENT USDI #9</p>	<p>RREIR RESPONSE USDI #9</p>
<p>Sensitive Species</p> <p>The proposed Abalone Cove Well Conversion Project area contains individuals of the threatened California gnatcatcher, and may contain the endangered Pacific pocket mouse, the endangered Palos Verdes blue butterfly and its foodplants. Section 9 of the Act prohibits the "take" of any federally listed endangered species by any person subject to the jurisdiction of the United States. Take is defined in 50</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>Please refer to Response to Comment USDI #4, USDI #5, and USDI #6 related to impacts to biological resources.</p> <p>Please refer to response to comment KS #28, KS #58, and KS #71 related to biological resource impacts.</p>

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<p>C.F.R. & 17.3 through the definition of harass and harm as follows: Harass in the definition of “take” means “an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding or sheltering.” Harm in the definition of “take” in the Act means an act which actually kills or injures wildlife. “Such an act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering.”</p>	<p>The EIR provides the following exhibits:</p> <ol style="list-style-type: none"> 1. Exhibit 16 - Aerial Photograph and Plant Communities 2. Exhibit 17 - Regionally Sensitive Plant Species Locations 3. Exhibit 18 - Locally Sensitive Plant Species Locations; and 4. Exhibit 19 - California Gnatcatcher and Cactus Wren Locations. <p>The Pacific pocket mouse is not known in the vicinity of the project. The location of the endangered Palos Verdes blue butterfly and its food plants were evaluated in detail for the project site and vicinity.</p> <p>Additionally, please refer to response to comment KS #70 related to the Pacific pocket mouse.</p>
<p>RREIR COMMENT USDI #10</p>	<p>RREIR RESPONSE USDI #10</p>
<p>Take incidental to an otherwise lawful activity may be authorized under sections 7, 10(a), or exempted under section 4 (d) of the Act. If a Federal agency is involved with the permitting, funding, or carrying out of the project, then initiation of formal consultation between that agency and the Service pursuant to section 7 of the Act is required if it is determined that the proposed project may affect a federally listed species. Such consultation would result in a biological opinion that addresses the anticipated effects of the project to the listed species and may authorize a limited level of incidental take. If a Federal agency is not involved with the project, and federally listed species may be taken as part of the project, then an incidental take permit pursuant to section 10(a) of the Act would need to be obtained. The Service may issue such a permit upon completion of a satisfactory habitat conservation plan for the listed species that would be affected by the project. Under the special 4(d) rule, take of California gnatcatchers during the plan preparation phase is authorized by local jurisdictions through habitat loss permits. The Conservation Guidelines limit interim habitat loss to no more than 5 percent of existing coastal sage scrub habitat. Incidental take of the California gnatcatcher as a result of land-use activities addressed in an approved NCCP plan would not be considered a violation of section 9 of the Act, provided the Service determines that the plan meets the issuance criteria for a “take” permit pursuant to section 10(a)(1)(B) of the Act and 50 CFR & 17.32(b)(2).</p>	<p>Please refer to Response to Comment DOA #1. To the extent that the proposed project will impact waters under the jurisdiction of the Army Corp of Engineers, Mitigation Measure 6 has been provided to reduce to reduce this impact to a less than significant level. The measure requires notification to the Army Corp of Engineers and approval as noted below.</p> <p>Mitigation Measure 6 provides:</p> <ol style="list-style-type: none"> 6. Prior to construction, project specifications shall be established requiring notification to United States Army Corp of Engineers (COE) and California Department of Fish and Game (CDF&G) and approval from these agencies to mitigate potential impacts as a result of the project to a level of insignificance. <p><i>The notification shall include the findings of surveys accomplished within a reasonable time of the notification for the following:</i></p> <ol style="list-style-type: none"> 1. Palos Verdes blue butterfly; 2. Palos Verdes blue butterfly foodplants; 3. Pacific pocket mouse; and 4. California gnatcatchers. <p>Compliance with this measure shall be verified by the Director of Public Works.</p>

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	<p>The approval of the COE will require consultation with the Service related to potential biological resource impacts.</p> <p>Should a COE permit not be required and it is determined that biological impacts would require approval of the Service the City would secure all permits required from the Services. The Service has not indicated that it is a responsible or trustee agency for the proposed project.</p>
<p>RREIR COMMENT USDI #11</p>	<p>RREIR RESPONSE USDI #11</p>
<p>The proposed Altamira Canyon Drainage Control Project may result in take of the California gnatcatcher, and possibly the Pacific pocket mouse and the endangered Palos Verdes blue butterfly. The Service recommends that adequate surveys for these three species be conducted. Mitigations that may be necessary for these listed species may require substantial changes in project design. Our comments on the potentially adverse impacts and proposed mitigation for this federally listed species are as follows:</p>	<p>The Final EIR for the Altamira Canyon Drainage Control Project was certified by the Rancho Palos Verdes Redevelopment Agency (RDA). The Altamira Canyon Drainage Control Project was considered in the list of past, present, and reasonably foreseeable future projects in the Local and Regional Setting Section of the EIR. The Final EIR for the Altamira Canyon Drainage Control Project addressed biological resource impacts related to the following:</p> <ol style="list-style-type: none"> 1. Pacific pocket mouse; 2. California gnatcatcher; and 3. Palos Verdes blue butterfly. <p>Specific surveys were accomplished for the Altamira Canyon Drainage Control Project with the preparation of the EIR.</p> <p>The Altamira Canyon Drainage Control Project is at considerable distance from the propose Abalone Cove Well Conversion Project.</p> <p>Additionally, please refer to response to comment KS #70 related to the Pacific pocket mouse.</p>
<p>RREIR COMMENT USDI #12</p>	<p>RREIR RESPONSE USDI #12</p>
<p>1) According to the DEIR, the surveys for the endangered Palos Verdes blue butterfly and its foodplants (<i>Astagalus trichopodus</i> var. <i>lonchus</i> and <i>Lotus scopartus</i>) were conducted in 1991 - 1993. This federally listed animal inhabits the Defense Fuel Support Point in San Pedro and historic populations are known from the project area. Although the locoweed and associated habitats may not have been occupied at the time of the various surveys,</p>	<p>Adequate surveys for the Palos Verdes blue butterfly and its foodplants (<i>Astagalus trichopodus</i> var. <i>lonchus</i> and <i>Lotus scopartus</i>) were conducted by the City. Mitigation Measure 6 has been modified as noted below in italics to respond to the concerns of the Service:</p> <p>Mitigation Measure 6 provides:</p> <ol style="list-style-type: none"> 6. Prior to construction, project specifications shall be established requiring notification to United

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<p>given the proximity of these patches to known habitat and the mobility of the butterfly, it is likely that through time the animal likely inhabit the project site, even though no individuals were observed during the prior survey work. Therefore, we recommend that an adequate survey for the endangered Palos Verdes blue butterfly be completed in the project area by a permitted entomologist and the results submitted to the Service for review and concurrence.</p>	<p>States Army Corp of Engineers (COE) and California Department of Fish and Game (CDF&G) and approval from these agencies to mitigate potential impacts as a result of the project to a level of insignificance.</p> <p><i>The notification shall include the findings of surveys accomplished within a reasonable time of the notification for the following:</i></p> <ol style="list-style-type: none"> 1. Palos Verdes blue butterfly; 2. Palos Verdes blue butterfly foodplants; 3. Pacific pocket mouse; and 4. California gnatcatchers. <p>Compliance with this measure shall be verified by the Director of Public Works.</p>
<p>RREIR COMMENT USDI #13</p>	<p>RREIR RESPONSE USDI #13</p>
<p>2) According to the DEIR, small mammal surveys were conducted in the City of Rancho Palos Verdes during a limited number of trap nights in 1989, 1993, and 1994. The endangered Pacific pocket mouse is historically recorded from the El Segundo area. No individuals were detected during the limited survey efforts. However, given the presence of suitable habitat and the cryptic habits of the animal, it is possible that this federally listed species inhabits the project site. Therefore, we recommend that an adequate survey for the endangered Pacific pocket mouse be completed in the project area by a permitted mammalogist</p>	<p>Please refer to Response to Comment USDI No. 7 relate to the Pacific pocket mouse.</p> <p>Additionally, please refer to response to comment KS #70 related to the Pacific pocket mouse.</p>
<p>RREIR COMMENT USDI #14</p>	<p>RREIR RESPONSE USDI #14</p>
<p>3) The proposed project likely will result in the take of at least one pair of California gnatcatchers. This issue should be resolved with the Service prior to the certification of the final environmental documents. Limited incidental take of the California gnatcatchers within subregions actively engaged in the preparation of a NCCP plan would not be considered a violation of Section 9 of the Act under the rule, provided that such take</p>	<p>The proposed project will not result in the "take" of a pair of California gnatcatchers. There is no evidence in the record that would support this conclusion by the Service. Mitigation Measure No. 8 has been revised to assure that a review of the findings of the EIR are accomplished.</p> <p>The EIR has estimated that:</p>

4.0 Responses to Comments

<p>resulted from activities conducted consistent with the NCCP Conservation and Process Guidelines. Take of coastal sage scrub during the plan preparation phase is authorized by local jurisdictions through habitat loss permits. The Conservation Guidelines limit interim habitat loss to no more than 5 percent of existing coastal sage scrub habitat.</p>	<p style="text-align: center;">POWER LINES AND POLES</p> <p>The proposed project will impact existing biological resources by the construction of power lines and poles. It is presently anticipated that not more than <i>four (4) five (5)</i> power poles will need to be constructed. The construction of the power poles will impact approximately <i>64 80</i> square feet of Coastal sage scrub habitat. This assumes that a maximum of <i>four (4) five (5)</i> power poles will be installed. Each power pole will impact an approximately four (4) square feet area. A worst case assumption has been made that the entire <i>64 80</i> square feet of Coastal sage scrub habitat will be lost. The significance of this impact is discussed below...</p> <p style="text-align: center;">COASTAL SAGE SCRUB</p> <p>As previously indicated, the proposed project will impact approximately 64 square feet of Coastal sage scrub habitat by the construction of power poles. This assumes that a maximum of four (4) power poles will be installed. Each power pole will impact an approximately four (4) square feet area. A worst case assumption has been made that the entire 64 square feet of loss will be Coastal sage scrub habitat. This small direct loss of this habitat is not considered a significant impact.</p> <p>Additionally, the City of Rancho Palos Verdes has agreed to provide for the revegetation of an area equal to the area impacted by the installation of the power poles, if they are located in Coastal sage scrub.</p> <p>Please refer to Response to Comment USDI #8 relate to the California gnatcatcher.</p> <p>Any action by the RDA would be to certify the EIR as adequate for the decisions to be made by the RDA. A certification would not preclude a responsible or trustee agency from making findings or taking actions pursuant to CEQA or the local CEQA Guidelines.</p>
<p>RREIR COMMENT USDI #15</p>	<p>RREIR RESPONSE USDI #15</p>
<p>4) The Service is concerned that the proposed Abalone Cove Well Conversion Project may result in indirect and cumulative impacts that may</p>	<p>Please refer to Response to Comment USDI #6 relate to direct, indirect, and cumulative biological resource impacts.</p>

4.0 Responses to Comments

<p>effect adequate reserve design for the City's NCCP. This issue should be resolved with the Service prior to certification of the final environmental documents.</p>	<p>Please refer to Response to Comment USDI #13 relate to the certification of the EIR.</p>
<p>RREIR COMMENT USDI #16</p>	<p>RREIR RESPONSE USDI #16</p>
<p><u>Conclusions and Recommendations</u></p> <p>Adoption of the project, as proposed in the DEIR, or any of the other five alternatives likely will require authorization from the Service for incidental take of the threatened California gnatcatcher, and possibly the endangered Pacific pocket mouse and Palos Verdes blue butterfly under sections 7 or 10(a), or possibly 4(d) to avoid potential violations of section 9 of this Act. The Service is especially concerned about the potential loss of the spring in Kelvin Canyon. The elimination or reduction in outflow of this source of surface water likely may have significant and far reaching adverse impacts on native wildlife. Therefore, the Service recommends that the City of Rancho Palos Verdes adequately address the above concerns prior to certification or select the no project alternative for the Abalone Cove Well Conversion Project.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p> <p>The proposed project will not result in the "take" of a pair of California gnatcatchers. There is no evidence in the record or data offered by the Service that would support this conclusion by the Service. Mitigation Measure No. 8 has been revised to assure that a review of the findings of the EIR are accomplished.</p> <p>Please refer to Response to Comment USDI #9 relate to direct, indirect, and cumulative biological resource impacts.</p> <p>Please refer to Response to Comment USDI #13 relate to the certification of the EIR.</p>
<p>RREIR COMMENT USDI #17</p>	<p>RREIR RESPONSE USDI #17</p>
<p>We appreciate the opportunity to review the DEIR and DRDEIR for potential impacts on endangered species, wildlife, and wetlands. We are available to work with the City of Rancho Palos Verdes in the development of an acceptable project. Please contact Chris Nagano or Mary Beth Woulfe of this office at the letterhead address or at (760) 431-9440 if you have any questions.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

RREIR ACWCP #12

STATE CLEARINGHOUSE

RREIR COMMENT SCH #1	RREIR RESPONSE SCH #1
<p>The State of California submitted the above named environmental document to selected state agencies for review . The review period is closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.</p> <p>Please call me at (916) 445-0613 if you have any questions regarding the environmental review process. When contacting the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.</p>	<p>Comment noted. The comment is acknowledged and will be forwarded to the appropriate decision makers.</p>

5.0 ERRATA

Changes to the EIR are noted below. Additions to the text are indicated with *italics*. Deletions to the text are indicated with strikeouts. Changes have been analyzed and responded to in Section 4.0 Responses to Comments. The changes to the EIR do not affect the overall conclusions of the environmental document. Changes are listed by page and where appropriate by paragraph.

Page 7, Table H

Alternative 1 No Project/No Development

Table H states that Alternative 1 No Project/No Development under Environmentally Superior, “No” is should state “Yes”. Revision is noted below:

Page 7, Table H

Alternative 1

Environmentally Superior

~~No~~ *Yes*

This change to Table H reflects the RREIR text on page 26. The text of the RREIR states as follows:

“The No Project/No Development Alternative It is environmentally superior to the proposed project and remains under consideration.”

Page 96 and 136

6. Prior to construction, project specifications shall be established requiring notification to United States Army Corp of Engineers (COE) and California Department of Fish and Game (CDF&G) and approval from these agencies to mitigate potential impacts as a result of the project to a level of insignificance.

The notification shall include the findings of surveys accomplished within a reasonable time of the notification for the following:

1. *Palos Verdes blue butterfly;*
2. *Palos Verdes blue butterfly foodplants;*
3. *Pacific pocket mouse; and*
4. *California gnatcatchers.*

APPENDIX

APPENDIX B
CORRESPONDENCE

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012-3606

September 10, 1996

IGR/CEQA 8025
DEIR
City of Rancho Palos
Verdes
Abalone Cove Well
Conversion Project
Vic: LA-001-14.63
SCH #96081039Dean Allison
City of Rancho Palos Verdes
30940 Hawthorne Blvd
Rancho Palos Verdes, California 90275-5391

Dear Mr. Allison:

Thank you for including the State of California Department of Transportation in the review process for the above referenced document.

Based on our review finding, we have no comment at this time; however, we will contact you again should we identify anything that should be brought to your attention.

If you have any questions regarding this response, please call me at (213) 897-4429.

Sincerely,

A handwritten signature in black ink that reads "Steve Buswell".

Steve Buswell
IGR/CEQA Coordinator
Transportation Planning
Office

cc: State Clearinghouse

RECEIVED
City of Rancho Palos Verdes
SEP 12 1996



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (310) 699-7411, FAX: (310) 695-6139

CHARLES W. CARRY
Chief Engineer and General Manager

September 9, 1996

File No: 05-00.04-00

Mr. Dean Allison
City of Rancho Palos Verdes
Department of Public Works
30940 Hawthorne Boulevard
Rancho Palos Verdes, CA 90275

Dear Mr. Allison:

Abalone Cove Well Conversion Project

The County Sanitation Districts of the Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on August 13, 1996. The proposed development is located within the jurisdictional boundaries of District No. 5. We offer the following comment regarding sewerage service:

- The Districts maintain facilities within the project area; however, they will not be affected.

If you have any questions, please contact the undersigned at (310) 699-7411, extension 2717.

Very truly yours,

Charles W. Carry

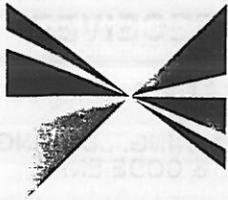
Marie L. Pagenkopp
Engineering Technician
Planning & Property Management Section

RECEIVED
City of Rancho Palos Verdes
SEP 13 1996

MLP:eg

PUBLIC WORKS DEPARTMENT

SOUTHERN CALIFORNIA



**ASSOCIATION of
GOVERNMENTS**

818 West Seventh Street
12th Floor
Los Angeles, California

90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

Officers: • President: Mayor Pro Tem Dick Kelly, Palm Desert • First Vice President: Supervisor Yvonne Brathwaite Burke, Los Angeles County • Second Vice President: Mayor Bob Bartlett, City of Monrovia • Immediate Past President: Supervisor Bob Buster, Riverside

County of Imperial: Sam Sharp, Imperial County • David Dhillon, El Centro

County of Los Angeles: Yvonne Brathwaite Burke, Los Angeles County • Richard Alarcon, Los Angeles • Richard Alatorre, Los Angeles • Eileen Ansari, Diamond Bar • Bob Bartlett, Monrovia • George Bass, Bell • Hal Bernson, Los Angeles • Sue Bauer, Glendora • Marvin Braude, Los Angeles • Robert Bruesch, Rosemead • Laura Chick, Los Angeles • John Crawley, Cerritos • Joe Dawidziak, Redondo Beach • Doug Drummond, Long Beach • John Ferraro, Los Angeles • Michael Feuer, Los Angeles • Karvn Foley, Calabasas • Ruth Galanter, Los Angeles • Eileen Givens, Glendale • Jackie Goldberg, Los Angeles • Garland Hardeman, Inglewood • Mike Hernandez, Los Angeles • Nate Holden, Los Angeles • Abbe Land, West Hollywood • Barbara Messina, Alhambra • David Myers, Palmdale • George Nakano, Torrance • Jenny Oropeza, Long Beach • Beatrice Proo, Pico Rivera • Mark Ridley-Thomas, Los Angeles • Richard Riordan, Los Angeles • Albert Robles, South Gate • Marcine Shaw, Compton • Ray Smith, Bellflower • Rudy Svornich, Los Angeles • Joel Wachs, Los Angeles • Rita Walters, Los Angeles • Judy Wright, Claremont • Paul Zee, South Pasadena

County of Orange: Marian Bergeson, Orange County • Ron Bates, Los Alamitos • Art Brown, Buena Park • Jan DeBay, Newport Beach • Richard Dixon, Lake Forest • Sandra Genis, Costa Mesa • Candace Haggard, San Clemente • Bev Perry, Brea

County of Riverside: Bob Buster, Riverside County • Dennis Draeger, Calimesa • Dick Kelly, Palm Desert • Ron Loveridge, Riverside • Ron Roberts, Temecula

County of San Bernardino: Larry Walker, San Bernardino County • Jim Bagley, Twentynine Palms • Deirdre Bennett, Colton • David Eshleman, Fontana • Tom Minor, San Bernardino • Gwenn Norton-Perry, Chino Hills • Robert Nolan, Upland

County of Ventura: Judy Mikels, Ventura County • Andrew Fox, Thousand Oaks • Stan Daily, Camarillo • John Melton, Santa Paula

September 24, 1996

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City of Rancho Palos Verdes

SEP 24 1996

PUBLIC WORKS DEPARTMENT

Mr. Dean Allison
City of Rancho Palos Verdes
Department of Public Works
30940 Hawthorne Boulevard
Rancho Palos Verdes, CA 90275

RE: SCAG Clearinghouse #: I9600314
Project Title: Notice of Completion for the Abalone Cove Well Conversion Project DEIR

Dear Mr. Allison:

We have reviewed the above referenced document and determined that it is not regionally significant per Areawide Clearinghouse criteria. Therefore, the project does not warrant clearinghouse comments at this time. Should there be a change in the scope of the project, we would appreciate the opportunity to review and comment at that time.

A description of the project will be published in the October 1, 1996 Intergovernmental Review Report for public 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 Betty Mann at (213) 236-1902.

Sincerely,

VIVIANE DOCHE
Manager, Intergovernmental Review

California Native Plant Society

SOUTH COAST CHAPTER

Ellen Brubaker
2220 South Walker
San Pedro, CA 90731

(310) 831 - 2872

RECEIVED

SEP 30 1996

PLANNING, BUILDING
& CODE ENF.

September 29, 1996

City of Rancho Palos Verdes
Department of Public Works
Attn. Mr Dean Allison
30940 Hawthorne Boulevard
Rancho Palos Verdes, CA 90275-5391

Re: DEIR Abalone Cove Well Conversion Project

Dear Mr. Allison:

The South Coast Chapter of The California Native Plant Society has reviewed the above mentioned Draft Environmental Impact Report (DEIR).

We found that the document includes some contradicting language which needs to be corrected:

a) Impacts in Significant Biological Resources

According to the executive summary (p. xvi) no biological resource impact on significant biological resources are anticipated. Only on page xxv of the summary is stated that the operation of the well will destroy the springs and the stream including the associated vegetation, without evaluating the impact as significant.

On page 62 it is clearly stated that this is considered a significant unavoidable adverse impact on biological resources, and we agree regarding the significance of this impact. To our knowledge, the State of California has a no wetland loss policy, since wetlands are considered to be sensitive resources.

Also, according to the survey results from the Manomet Observatory for Conservation Sciences of the past years, there were cactus wrens and a gnatcatcher pair seen in the vicinity of the project, which are considered to be sensitive biological resources.

The separation within the executive summary between impacts,



Dedicated to the preservation of California native flora

impacts mitigated to a less than significant level and unavoidable adverse impacts is extremely confusing and may even be misleading, since one expects to see all impacts the DEIR analyzes summarized under the first part with the general heading "Draft Environmental Impact Report".

b) Impacts on Biodiversity

Again, according to the executive summary the "conversion of the existing monitoring well to operate as dewatering will not have an impact on plant or animal biodiversity..."

What is this statement based on?

It is quite obvious to us that the loss of surface water and the lowering of the ground water will also cause the loss of the riparian elements and the willows in Kelvin Canyon, and thereby the loss of biodiversity.

c) Size of Impacted Coastal Sage Scrub

According to the summary of impacts and their significance, the proposed project will have an impact on approximately 64 square feet coastal sage scrub. The same number is given on page 62, considering 4 power poles. However, on page 61 is stated that no more than 5 power poles are anticipated, which would, in the worst case scenario impact 80 square feet. Although these numbers may be small, they indicate that the DEIR is not thought through thoroughly.

d) Evaluation of Project Alternatives

Why is the no project alternative not considered to be environmentally superior, although it would not have the adverse impacts of the project?

e) Evaluation of The Stream Bed With Riparian Elements

According to page 62 Kelvin Canyon "..is one of several canyons with perennial water on the west side of the hill from San Pedro to Malaga Creek in Palos Verdes Estates".

However, the attached Biological Assessment Rancho Palos Verdes Redevelopment Area notes: "These two [Klondike and Kelvin Canyons] are the only canyons with perennial water on the west side of the hill from San Pedro to Malaga Creek in Palos Verdes Estates and therefore unique for wildlife and local habitat diversity." (p.12). Of the two named canyons, Kelvin Canyon is the more natural, since the water in Klondike Canyon is already mostly collected in plastic pipes. In our opinion this makes Kelvin Canyon absolutely unique and we would like to know, where the other several canyons with year round running water are, since we are not aware of them.

Additionally we have several questions that need to be clarified:

- o If the significant impact of the loss of the spring, perennial water and riparian vegetation is really unavoidable, it should at least be attempted to mitigate that significant impact.
How will the loss of wetland, riparian vegetation and thereby biodiversity be mitigated?

- o According to the proposal, the discharge pipe will only be buried for about 50 feet and otherwise run on the surface. Will it therefore not be more sensitive against damages and may the maintenance of a surface pipe not require occasional or even regular control checks?
If so, a path along the pipeline would be an increased impact.
According to mitigation measure 2, sensitive biological resources have to be avoided by the pipeline, but what if an impact turns out to be unavoidable?
The proposed way of the pipeline is indicated on Exhibit 16 which shows the distribution of the existing plant communities in the project area. However it seems it has to cross cactus scrub as well as coastal sage scrub, two of the most sensitive plant communities in the State of California. Therefore appropriate replacement ratios should be included in the mitigation measures in case that impacts may be unavoidable.

- o How will this proposed project that will cause the destruction of a locally unique biological resource fit into the proposed subregional NCCP ?
According to the Manomet Observatory for Conservation Sciences gnatcatcher and cactus wren survey, one of the localities that support critical tracts of coastal sage scrub habitat on the Peninsula are areas within the Rancho Palos Verdes Redevelopment Plan area from Klondike Canyon west to Altamira Canyon at elevations greater than approximately 400 feet. The proposed project lies within this area.
The importance of surface water for wildlife is undisputed in the DEIR, but not considered significant.
The City, who is also the lead agency for the NCCP plan should keep in mind that one of the hopes for the NCCP is that with its implementation the possible future endangerment of other species of the habitats incorporated in the program will be halted. The inclusion of a perennial stream and the restoration of native habitat surrounding it, surely would fit in this program better than the destruction of the last natural perennial stream on this side of the hill between San Pedro and Palos Verdes Estates.

Last, but not at least, we would like to repeat our concern voiced in our comments to the Initial Study that the landslide stabilization measures are piece-mealed. On page vi of the DEIR is clearly stated "The proposed project is one (1) of several actions that need to be implemented in order to fully stabilize the Abalone Cove Landslide." If so, why are they not all treated in one EIR, so that their impacts and possible alternatives can be fully evaluated?

Since the conversion of the well alone will not stop the landslide we urge you to not allow the destruction of the only natural year-round running stream on the south side of the hill.

Sincerely,



Ellen Brubaker
President, South Coast Chapter

cc: Mr. Joel Rojas, Senior Planner, Dept. of Planning, Building
and Code Enforcement

Kathy Snell
#8 Vanderlip Driveway
Rancho Palos Verdes, Ca. 90275
September 29, 1996
(310) 541-1266

Mr. Joel Rojas, Senior Planner
City of Rancho Palos Verdes
30940 Hawthorne Boulevard
Rancho Palos Verdes, California 90275-5391

Re: ABALONE COVE WELL CONVERSION PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Mr. Rojas:

Due to the fact that the city scheduled important development code revision hearings during the same review period for the Draft EIR, and these code revisions constitute the "taking of my property rights," I am asking for an extension of time to properly review this EIR which was scheduled to be completed a few years ago. As you are aware, I am one of the few land owners who will be effected by the loss of my right to have a cow, keep bees, keep goats for fire protection, etc. This EIR is the most massive document, measuring 2" thick. The dewatering of Kelvin Canyon also constitutes the taking of rights (riparian). It is not reasonable for one to believe that I could review and comment on this document while my property rights were being attacked with remarks from the city council to reduce horses to 3, license goats and sheep and not allow bees and cows. The actions of the City/RDA/attorney appear to be very punitive to me personally.

THIS DRAFT EIR FAILED TO EVALUATE THE

LOSS OF WETLANDS

AS THE PUMPING OF THE WELL WILL DEplete KELVIN CANYON SPRING WHICH FLOWS OVER 2,000 FEET OFFERING THE ONLY REMAINING WATERING SOURCE ON THE SOUTH SIDE OF THE PENINSULA. THE WETLANDS WILL DRY UP. LOSS OF WETLANDS AND THE LAWS PROTECTING WETLANDS MUST BE DISCUSSED. THE IMPACT MUST AND CAN BE MITIGATED.

ON 9-27-96, I MADE ANOTHER VISUAL EXAMINATION OF THE PROJECT AREA. I HAVE LIVED IN THE PROJECT AREA SINCE 1974 AND PROBABLY KNOW THE AREA BETTER THAN ANYONE. THE SMALL FOOT TRAIL LEADING UP A TREACHEROUS, STEEP MOUNTAIN SIDE HAS BEEN MADE INTO AN EIGHT FOOT WIDE, 4 WHEEL DRIVE DIRT ROAD BECAUSE OF THE NEGLIGENCE OF PERSONS WHO WORK FOR THE CITY, THE RDA, ACLAD, THE GEOLOGIST, ETC. BY USING THEIR 4W DRIVE VEHICLES AND MOTORIZED CARTS ILLEGALLY ON A DIRT

FOOT TRAIL. ALONG THE WEST SIDE OF THIS TRAIL WHICH RUNS SOUTHEAST TO NORTHWEST TOWARD DEL CERRO PARK, THE STEEP TRAIL SHOWS EVIDENCE OF A FLASH FLOOD WHICH GAINED SPEED AND WATER VOLUME WHILE FLOWING DOWN THE MOUNTAIN SIDE ON THE ILLEGALLY ESTABLISHED DIRT ROAD. THE POWER OF THE NEWLY DIRECTED WATER WASHED OUT PART OF THE SUPPORT OF THE DIRT ROAD AND PLUMMETED INTO WHAT IS CONSIDERED TO BE A PROTECTED GNATCATCHER HABITAT. THE ILLEGAL ROAD ALSO HAS INTRODUCED DOMESTICATED DOGS AND CATS INTO THE PROTECTED HABITAT AREAS FOR THE GNATCATCHER AND CACTUS WREN. GNATS WERE IN THIS AREA. MUCH FOOD SUPPLY WILL BE LOST WHEN THE PUMPING OF THE WELL SLOWS DOWN OR DRIES UP THE STREAMS. GNATS WERE SEEN ON SITE. THE IMPACT MUST BE DISCUSSED AND MITIGATED.

SINCE THE ILLEGAL ROAD WAS ESTABLISHED, LONG TERM CAMPERS USED THE ROAD TO ACCESS THE AREA AND MAINTAINED A SMOLDERING FIRE WHICH WAS USED FOR COOKING AND WARMTH AT NIGHT. IT TOOK THE FIRE DEPARTMENT HOURS TO ACCESS THE LOCATION, PUT THE FIRE OUT, AND REMOVE THEIR EQUIPMENT FROM THE AREA. THE FIREMEN REPORTED THAT THE EVIDENCE INDICATED THAT THE FIRE HAD BEEN SMOLDERING FOR A MONTH OR SO. THE SITE OF THE FIRE WAS 200 FEET SOUTH OF THE WELL LOCATION ADDRESSED IN THIS EIR. THE REPORT OF THIS FIRE SHOULD BE EVALUATED AND CONSIDERED TO COMPLETE THIS EIR. THIS IS A PICTURE OF THE LOGS WHICH WERE SMOLDERING:



IT IS OBVIOUS THAT ANY FURTHER WORK ON THE DIRT ROAD WILL BE DEVASTATING TO THE GNATCATCHER AND CACTUS WREN HABITATS, ESPECIALLY FROM WATER EROSION, INTRODUCTION OF DOMESTICATED ANIMALS, INCREASED FIRE RISK AND LOSS OF FOOD SOURCES. AS THE GNATCATCHER CAN NOT FLY FAR ENOUGH TO AVOID THE DANGER OF CATS,

DOGS AND MAN, THE REMAINING BIRDS WILL BE WIPED OUT. SAFEGUARDS SHOULD BE PUT IN PLACE SO THIS DOES NOT CONTINUE. IF THE CITY AND RDA STAFF STOP TRANSITING THE ILLEGAL ROAD THEY MADE, THE AREA SHOULD RESTORE ITSELF BEFORE FURTHER DAMAGE. SEEDING IT WOULD FURTHER GUARANTEE RESTORATION.

THIS EIR IS INCOMPLETE AS IT HAS FAILED TO ADDRESS THE EROSION WHICH WAS CREATED BECAUSE OF THE ESTABLISHMENT OF THE ILLEGAL DIRT ROAD AND THE FUTURE EROSION WHICH WILL RESULT BY FURTHER CONSTRUCTION OF THE ROAD.

THE GRADE OF THE ROAD IS SO STEEP, SPECIAL DRAINAGE CULVERTS MUST BE CONSTRUCTED. THE EXISTING DIRT ROAD WILL NOT HANDLE HEAVY EQUIPMENT CARRYING GRAVEL. VEHICLES USING THE ROAD ARE SUBJECT TO ROLLING AND WOULD CRASH LAND IN THE GNATCATCHER HABITAT.

THE DIRT ROAD GOES UP A MOUNTAIN SIDE FROM 500' TO 800' ELEVATION AND THE ROAD DESIGN CAN NOT MEET ANY CODES OR REQUIREMENTS FOR SAFETY. NO VEHICLE CAN BE ASSURED OF REMAINING ON THE ROAD DURING RAIN OR WIND. VEHICLES FALLING OFF OF THIS STEEP ROAD WOULD HAVE A GREAT POTENTIAL OF CRASHING INTO ONE OF THE GNATCATCHER HABITATS. VEHICLE TRAFFIC FOR WELL MONITORING PLUS OTHER 4 WHEEL DRIVE VEHICLES DRIVING SO CLOSE TO HABITAT WILL AND HAS IMPACTED THE GNATCATCHERS AND CACTUS WREN. MITIGATION MEASURES ARE NEEDED.

DR. ELIG, THE CITY/RDA/PANEL OF EXPERT'S GEOLOGIST, WROTE CORRESPONDENCE TO THE CITY/RDA STATING THAT THE WELL SITE (OLD MONAHAN WELL) UNDER CONSIDERATION IS NOT SUITABLE. HE ALSO REPORTED THAT ONE OF THE NEW WELLS ON HON'S PROPERTY JUST OFF OF THE OLD CRENSHAW ROAD EAST OF KELVIN CANYON ON A FIRE ROAD WOULD ACCOMPLISHED THE SAME OBJECTIVE OF DEWATERING KELVIN CANYON SPRING. DR. ELIG ALSO MAINTAINS THAT THIS HON SITE IS CURRENTLY ACCESSIBLE AND HAS POWER CLOSE BY THE WELL. OTHER WELLS CAN BE DEWATERED, ALL WILL ACCOMPLISH REMOVING THE WATER FROM KELVIN CANYON SPRING, A NATURAL WETLANDS. DR. ELIG'S WORK AND MEMOS MUST BE INCLUDED AND CONSIDERED IN THIS EIR FOR PROPER EVALUATION OF THIS PROJECT OR THIS EIR WILL BE INCOMPLETE.

COST OVERRUNS HAVE ALREADY BEEN TREMENDOUS FOR THIS PROJECT AND HAVE EXCEEDED THE AMOUNT THAT THE RDA AGENCY HAVE BEEN ENTRUSTED WITH TO ESTABLISH A SIMPLE DEWATERING WELL. THE RDA HAS BEEN FUNDING THE WORK NECESSARY TO COMPLETE THIS EIR WITH THE "HORAN LIEN MONEY" WHICH IS SUPPOSE TO BE USED TO STABILIZE THE ABALONE COVE SLIDE. DR. ELIG MAINTAINS THAT THE DEWATERING OF THIS WELL, TO A GREATER DEGREE, WILL HELP TO STABILIZE THE PORTUGUESE

BEND SLIDE. THE WELL SHOULD NOT ENTIRELY BE FUNDED BY HORAN.

1.0 Executive Summary, page v

"The City has the principal authority to carry out the proposed project and is the lead agency for the preparation and certification of this EIR."

WHY DIDN'T THE CITY PAY FOR THIS EIR, CONDUCT HEARINGS FOR THE EIR AND CERTIFY IT? WHY DOESN'T THE CITY DIVIDE THE COST BETWEEN PORTUGUESE BEND AND ABALONE COVE BASED ON BENEFIT ASSESSMENT?

Alternatives

THIS EIR IS INCOMPLETE AND NOT ADEQUATE BECAUSE IT FAILED TO ADDRESS THE NEWLY ESTABLISHED WELLS WHICH WERE PERMITTED ON THE HON PROPERTY AS BORINGS. THE "BORING" WERE CAPPED OFF TO SERVE AS FUTURE DEWATERING WELLS. ONE OR MORE OF THESE WELL SITES IS FAR SUPERIOR TO THE PROJECT SITE AND ALL ALTERNATIVES REVIEWED IN THIS EIR. THIS EIR FAILED TO ADDRESS THE NEW WELLS WHICH WERE INSTALLED BEFORE THIS DRAFT EIR WAS CIRCULATED. IN ADDITION, DR. ELIG HAS WRITTEN MEMOS ON THE NEW WELLS POINTING OUT THAT THE NEW WELLS, ONE IN PARTICULAR, IS A BETTER ALTERNATIVE TO THE MONAHAN WELL. THE WELL DR. ELIG WISHES TO USE AS AN ALTERNATIVE IS FEASIBLE, MEETS THE OBJECTIVES OF THE PROJECT, IS ENVIRONMENTALLY SUPERIOR THAN THE PROPOSED PROJECT BUT THIS EIR FAILED TO CONSIDER IT AS AN ALTERNATIVE.

Growth Inducing Impacts of the Proposed Project page vi

"...the proposed project consists of improvements to lower the groundwater level in Abalone Cove Landslide area..."

THE FACT IS THAT THE CITY/RDA GEOLOGIST MAINTAINS THAT THE GROUND WATER WILL BE LOWERED IN THE PORTUGUESE BEND SLIDE AREA. INFORMATION FROM DR. ELIG'S WORK, MEMOS AND MAPS NEED TO BE CONSIDERED IN THIS EIR.

"...in order to fully stabilize the Abalone Cove Landslide..."

THE CITY/RDA GEOLOGIST REPORTED THAT THE ABALONE SLIDE WAS STABILIZED YEARS AGO.

"...growth inducing impacts are not anticipated..."

CITY RECORDS INDICATE THAT THE CUMULATIVE IMPACT OF THE SEWERS,

WELLS AND DRAINAGE LINING, ETC. WILL OPEN BUILDING FOR VACATE LOTS. THAT'S WHY THE RDA APPROVED SEWER LATERALS FOR EMPTY LOTS...FUTURE BUILDING. THIS PROJECT WITH THE OTHERS WILL DIRECTLY RESULT IN AN INCREASE IN THE LOCALIZED POPULATION. LOW, VERY LOW AND MODERATE INCOME HOUSING NEEDS TO BE ADDRESSED, ESPECIALLY BECAUSE THE AREA IS LOCATED WITH THE BOUNDARY OF THE REDEVELOPMENT AGENCY ESTABLISHED TO CLEAR BLIGHT AND SLUMS.

"...effort to prevent destruction to existing development..."

THERE IS NO DESTRUCTION TO EXISTING DEVELOPMENT. ALL 'DESTRUCTION' WAS MINIMAL AND HAPPENED YEARS AGO. ONE HOUSE WAS RUINED AND HAS NOW BEEN REBUILT ON THE SAME SITE!

General Summary Earth Resources, page viii

"No grading activities will be required."

IT IS OBVIOUS THAT GRADING WILL BE REQUIRED FOR THE ACCESS ROAD. THERE IS A TWO FEET DROP FROM THE STEEP ACCESS TRAIL TO THE FIRE ROAD WHICH WILL REQUIRE GRADING. THE ENTIRE ACCESS TRAIL WILL REQUIRE GRADING TO BRING IT INTO SAFETY AND SLOPE REQUIREMENTS OF THE CITY. LEVEL OF SIGNIFICANCE IS HIGH.

"...will not result in the disruption, displacement, compaction, or overcovering of soil."

THE ACCESS ROAD HAS SUFFERED COMPACTION OF AT LEAST 10,000 SQUARE FEET OF ENVIRONMENTALLY SENSITIVE MOUNTAIN SIDE WATERSHED AND GNATCATCHER HABITAT BY THE ILLEGAL USE OF VEHICLES ON A TRAIL BY THE CITY/RDA/EIR STAFF WHILE TRYING TO FIGURE OUT IF THE AREA WAS ENVIRONMENTALLY SENSITIVE. ALL ACCESS TO THIS AREA SHOULD BE LIMITED TO WALKING IN TO THE SITE.

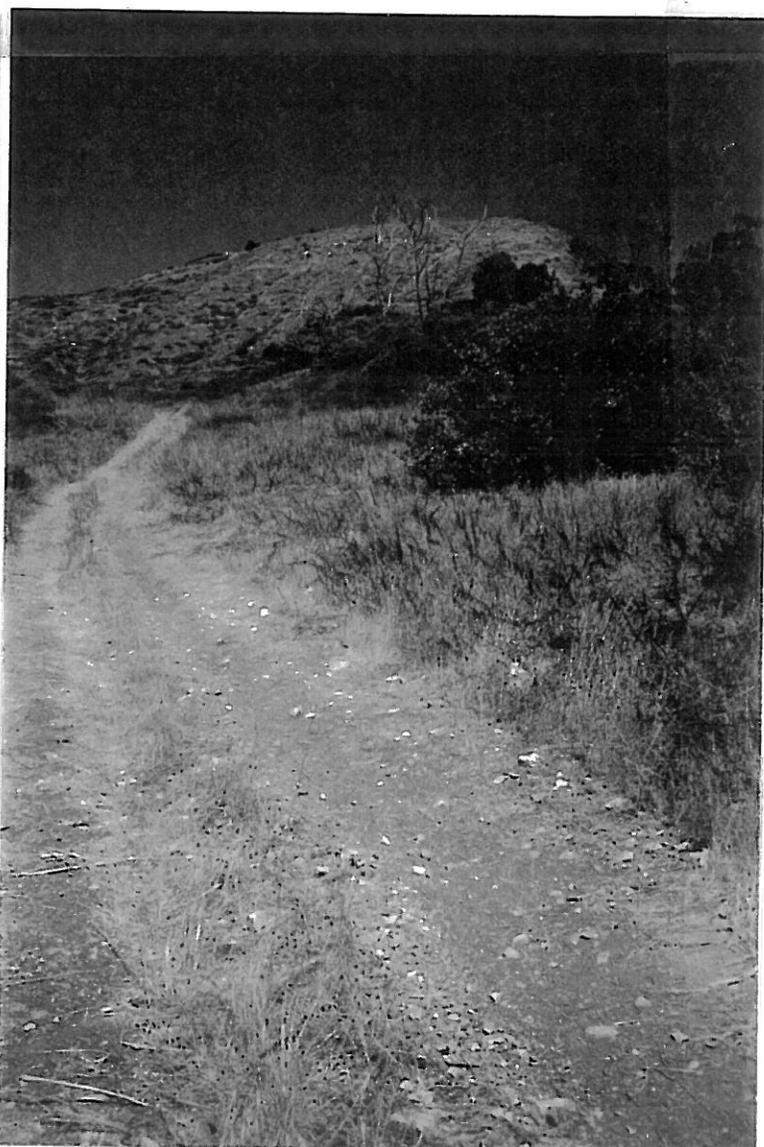
"...will not increase...water erosion of soils...no clearing of existing vegetation will be required..."

DUE TO THE RDA/CITY/EIR/GEOLOGICAL/EDISON/ENGINEERING/ACLAD STAFFS ILLEGAL USE OF 4 WHEEL DRIVE VEHICLES TO ACCESS THE AREA IN ANTICIPATION OF THIS PROJECT, VEGETATION WAS ALREADY REMOVED. EROSION OF SOILS HAS ALREADY TAKEN PLACE. THE DAMAGE WILL CONTINUE AND INTENSIFY AS THIS PROJECT CONTINUES. THE COASTAL SAGE SCRUB WAS REMOVED AT THE SITE OF THE WELL. GNATCATCHER HABITAT WILL BE DEVASTATED WITH MUD SLIDES CAUSED BY THE "WASH" WHICH THE CITY/RDA STAFF CREATED WITH THEIR OFF ROAD VEHICLES. THE LACK OF VEGETATION AND STEEPNESS OF THE ROAD IS SHOWN IN THE FOLLOWING PICTURES:

AT HALF WAY POINT UP
THE PATH LOOKING DOWN
STEEP HILL



AT HALF WAY POINT ON THE
PATH LOOKING UP THE STEEP
PATH WITH THE WELL LOCATED
BEYOND THE TREES.



"...will not cause significant changes in deposition or erosion of beach sands, or changes in siltation, deposition, or erosion which may modify the channel of a river or stream or the bed of the ocean..."

THE DEWATERING OF KELVIN CANYON SPRING, A BLUE LINE STREAM, WILL LEAD TO THE MODIFYING OF THE **LAST REMAINING WETLANDS** ON THE SOUTH SIDE OF THE PENINSULA. THE ADDITIONAL WATER DUMPED ONTO THE BEACH TRANSPORTED THROUGH THE DEWATERING PIPES WILL MODIFY THE BEACH.

"...lower the groundwater level and help to reduce the driving forces in the active Abalone Cove Landslide Area."

DEWATER KELVIN CANYON SPRING BY PUMPING THE MONAHAN WELL OR THE HON WELL WILL IMPACT THE GROUND WATER LEVEL IN THE PORTUGUESE BEND SLIDE. WILL THE LOWERING OF GROUND WATER REDUCE THE DRIVING FORCES IN THE PORTUGUESE BEND SLIDE? THIS IMPACT NEEDS TO BE CONSIDERED. THE ABALONE COVE SLIDE IS NOT "ACTIVE."

Air, page ix, "will not result in...deterioration of...air quality."

ENDING THE 1,000-2,000 FEET LONG FLOW OF KELVIN CANYON SPRING WATER WILL END THE IONIZATION OF THE AIR, THUS INCREASING THE TEMPERATURE AND REDUCING THE AIR QUALITY.

"...will not alter air movement, moisture, temperature, or result in any changes in climate on a local...basis."

DEWATERING OF KELVIN CANYON SPRING WILL CAUSE THE AREA TO BECOME A DUST BOWL, MUCH LIKE THE MIDWEST BECAUSE OF TOO MUCH PUMPING OF GROUND WATER. THE CANYON AREA AT THE SPRING DOWN TO AND INCLUDING MY PROPERTY WILL DRY UP. THE TREES WILL DIE. THE CLIMATE WILL CHANGE FROM A COOL, DAMP WETLANDS INTO A DRY, HOT DUST BOWL. MITIGATION MEASURES MUST BE EMPLOYED: CONTINUE WATERING TREES.

Water Resources, page ix

"...will not result in the change of currents or direction of water movements in marine or fresh waters." ETC.

DRYING UP OF KELVIN CANYON WILL END THE DIRECTION OF THE SPRING WATER FLOW WHICH CERTAINLY CONSTITUTES A CHANGE.

THE ILLEGAL ROAD HAS ALREADY MODIFIED THE EXISTING ABSORPTION RATES, DRAINAGE PATTERNS AND INCREASE IMPERVIOUS SURFACES IN THE

AREA. WITH A SIMILAR RAINSTORM OF JANUARY 3, 1995, DUMPING 7-12 INCHES OF RAIN IN A FEW HOURS, THE PROPOSED ROAD HAS THE POTENTIAL TO DELIVER TREMENDOUS AMOUNTS OF SWIFT RUNNING WATER AND MUD INTO MY BACKYARD POTENTIALLY CAUSING UNBELIEVABLE DAMAGE TO LIFE AND PROPERTY. THIS PROPOSED PROJECT, WITH THE ACCESS ROAD, WILL RESULT IN ALTERATIONS TO THE COURSE AND FLOW OF FLOOD WATERS AND COULD CAUSE FLOODING OF GNATCATCHER HABITAT AND MY BACKYARD.

THE PROPOSED PROJECT WILL OUTLET INTO THE OCEAN WITH OTHER SEPTIC TANK POLLUTED WATER. THE SEPTIC TANK POLLUTED WATER FROM ALL DEWATERING WELLS WITHIN RDA, INCLUDING KLONDIKE, PORTUGUESE BEND, ACLAD AND THE HORAN WELLS SHOULD HAVE THE PROPER WATER TESTING AND PERMITS. EVEN WITH SEWERS INSTALLED WITHIN RDA, THE SEWAGE FROM ROLLING HILLS WILL CONTINUE TO ENTER THE DEWATERING WELLS IN PORTUGUESE BEND AND KLONDIKE AND IS BEING PUMPED INTO THE OCEAN.

THE ENTIRE DEWATERING SYSTEMS WITHIN THE RDA WHICH DUMPS INTO OUR OCEAN ARE FULL OF CHEMICALS FROM MAN MADE FERTILIZERS, POLLUTANTS FROM INSECT SPRAYS, MOTOR OIL AUTO LEAKS, BRACKISH WATER, SEWAGE, ETC. PEOPLE, ESPECIALLY CHILDREN, ARE NOW EXPOSED TO THE POLLUTED WATER WHICH CURRENTLY RUNS THROUGH ALL OF THE DEWATERING PIPES AND SUBJECTS PEOPLE TO POLLUTED WATER AT THE OUTFLOW. THE MERE FACT THAT THE SPRING WATER WILL BE COMBINED WITH THIS POLLUTED WATER, OPENS THIS EIR UP TO EVALUATING THE POLLUTED WATER HAZARDS WITHIN THE ENTIRE RDA, INCLUDING THE OUTFLOW PIPE AT THE BEACH.

Page x Water Resources

"The proposed project may result in a decrease in the amount of surface water currently discharged from the Kelvin Canyon spring located in the bottom of Kelvin Canyon. Kelvin Canyon is designated as a blueline stream on the U.S.G.S. topographical map. Although no impact related to water is anticipated, impacts may occur to plant life and animal life due to the reduction of surface water in the stream."

THE PANEL OF EXPERTS, INCLUDING DR. ELIG, BELIEVE THAT THE DEWATERING OF A WELL IN THE VICINITY OF THE KELVIN CANYON SPRING WILL DEplete OR SLOW DOWN THE WELL WATER. ALL INFORMATION GATHERED DURING PANEL MEETINGS INDICATED THAT THE SPRING COULD RUN DRY. THE DEPLETION OF A BLUE LINE STREAM WILL CREATE A TREMENDOUS IMPACT ON THE PLANT LIFE AND ANIMAL LIFE AND MUST BE ADDRESSED. THIS IS A **WETLANDS**. MAJOR ADVERSE IMPACTS MUST BE ADDRESSED. MITIGATION MEASURES ARE AVAILABLE, I.E.: PROVIDING WATER BOWLS EVERY 100' OVER THE 2,000 FEET OF WETLANDS. THE WILLOWS, WALNUTS AND ALL NATIVE TREES AND PLANTS NEED TO BE WATERED. THE PEPPER TREES AND ALL DEEP ROOT TREES BELOW THE WELL NEED TO BE PROTECTED BY

HAVING A BIOLOGIST TYPE SPECIALIST TO EVALUATE WHAT THE LOWEST WATER TABLE DEPTH IS ALLOWABLE TO MAINTAIN THESE TREES.

"The proposed project may alter the direction or rate of flow of groundwater in the area. Groundwater is not a(n)... aquifer recharge in this location."

DR. ELIG'S MEMO TO THE CITY WHICH WAS DISTRIBUTED TO CITY COUNCIL AND/OR RDA AGENCY MEMBERS, WHICH SHOULD BE CONSIDERED IN THIS EIR, CLEARLY EXPLAINS HOW THIS LOCATION AND THE LOCATION OF THE NEW WELL ON THE HON PROPERTY ACTS AS AN AQUIFER RECHARGE TO KELVIN CANYON.

THE DEWATERING OF THIS WELL WILL SLOW DOWN OR DEplete THE KELVIN CANYON SPRING WHICH DR. ELIG'S RESEARCH DISCLOSED THAT THE SPRING RECHARGES THE PORTUGUESE BEND AND THE ABALONE COVE SLIDES. THIS RESEARCH SHOULD BECOME PART OF THIS EIR OR THIS DOCUMENT IS FLAWED AND INCOMPLETE. MITIGATING MEASURES MUST BE DISCUSSED BEFORE THIS PROJECTS WHICH WILL **ADVERSELY EFFECT THE WETLANDS** MOVES FORWARD.

Plant Life, Animal Life, page xi, Biological Resources, page xvi

"...will not result in the changes in the diversity of species...new species or animals..."

WITH THE ILLEGAL INSTALLATION OF THE MONAHAN MONITORING WELL, A GNATCATCHER HABITAT, WITH GNATCATCHERS, WAS DEMOLISHED. IN PLACE OF THE COASTAL SAGE, A FOREIGN LICORICE TYPE WEED HAS FLOURISHED. THIS WEED WAS TRANSPORTED BY CONSTRUCTION VEHICLES FROM BELOW THE SITE. BECAUSE OF THIS PROPOSED PROJECT, ADDITIONAL GNATCATCHER HABITAT LOCATED MID WAY DOWN THE STEEP ROAD DUE WEST NEEDS TO BE PROTECTED FROM FLOODING, FIRE, INTRODUCTION OF DOMESTIC ANIMALS AND PEOPLE USING THE ROAD. IN ADDITION, THE CACTUS WREN HABITAT EAST OF THE ROAD MUST BE PROTECTED. THIS EIR IS INCOMPLETE WITHOUT ADDRESSING IMPACT AND MITIGATION MEASURES.

PLACING SEVERAL POWER POLES DOWN THE STEEP WALL AND THE WET FLOOR OF THE CANYON THROUGH A THICK GNATCATCHER HABITAT WOULD CREATE A SIGNIFICANT IMPACT WHICH THE DESTRUCTION OF PLANT AND ANIMAL LIFE AND MUST BE MITIGATED.

"...or result in a barrier to the migration or movement of animals..."

THE NEW, WIDENED ROAD WILL CLEARLY BE A THREAT TO WILDLIFE AS THEY CAN NO LONGER RELY ON THE BRUSH FOR PROTECTION. THE RESULTING DRIED UP SPRING BED WILL HAVE AN ADVERSE IMPACT ON ANIMAL AND

PLANT LIFE. THE NEW ROAD WILL DIVIDE THE HABITAT. THE LENGTH AND GRADE OF THE ROAD NEEDS EVALUATION AND SAFETY MEASURES INSTALLED. HOW MANY TONS OF GRAVEL WILL BE USED? HOW WILL IT BE DELIVERED AND SPREAD? PLEASE REMEMBER THAT CHARLIE ABBOTT RECOUNTED A STORY ABOUT A TRACTOR OPERATOR WHO COULD HAVE BEEN SEVERELY INJURED OR COULD HAVE DIED IF HIS TRACTOR HAD ROLLED WHILE GOING DOWN A STEEP TRAIL TO THE OCEAN AT SACRED COVE. TOO MANY RISKS HAVE BEEN TAKEN IN THE NAME OF "STOPPING THE SLIDE." THIS ROAD IS NOT UP TO CODE AND IS VERY DANGEROUS AND MUST BE EVALUATED AND MITIGATED.

LOWERING OF GROUND WATER WILL IMPACT ALL DEEP ROOTED TREES. NO ONE IS MONITORING THE IMPACT AND TREMENDOUS AMOUNT OF WATER WHICH IS NOW BEING TAKEN OUT OF THE GROUND BY ACLAD, KLONDIKE, RDA IN PORTUGUESE BEND AND RDA IN ABALONE COVE SLIDE AREA.

Land Use, page xii. THE PIPE OUTLET IS WITHIN THE COASTAL ZONE.

Risk of Upset

THE PROPOSED PLAN CREATES AN INTERFERENCE WITH EMERGENCY RESPONSE AS THE SITE WHERE ELECTRICAL LINES ARE PROPOSED, DIRECTLY BELOW BURRELL, DEL CERRO PARK AND ISLAND VIEW, WILL REMAIN INACCESSIBLE TO FIRE TRUCKS. THE ALTERNATIVE WELL SITE WHICH DR. ELIG SUGGESTED BUT IS NOT COVERED IN THIS EIR IS LOCATED ON A "FIRE ROAD" AND PROVIDES A MUCH SAFER AND ACCESSIBLE SITE.

CHANGING THE SITE TO THE NEW HON WELL WHICH DR. ELIG PREFERS AS AN ALTERNATIVE BUT WAS NOT CONSIDERED IN THIS EIR WILL END THE FIRE THREAT TO DEL CERRO, ISLAND VIEW AND BURRELL.

Transportation/Circulation

DUE TO THE FACT THAT VEHICULAR TRAFFIC WILL BE GENERATED FOR THE MAINTENANCE AND READING METERS FOR THE WELL AND THIS TRAFFIC WILL USE A PRIVATE DRIVEWAY TO GAIN ACCESS ONTO A DIRT ROAD WHICH CONNECTS TO THE 4 WHEEL DRIVE ROAD CREATED BY RDA/CITY STAFFERS BEFORE COMPLETION OF THIS EIR, THERE WILL BE A CONSIDERABLE INCREASE IN TRAFFIC ON THIS ROAD SINCE NO VEHICULAR TRAFFIC IS ALLOWED NOW. TRANSITING A PRIVATE DRIVEWAY ALSO WOULD BE CONSIDERED AS AN ADVERSE IMPACT, ESPECIALLY IF IT WERE YOUR PRIVATE DRIVEWAY. VANDERLIP IS A PRIVATE DRIVEWAY-NOT A ROAD OR DRIVE.

HOW WILL THE VEHICLES GAINING ACCESS TO THE SITE CROSS OVER THE

SPRING IN AN ENVIRONMENTALLY SENSITIVE WAY? PERSONS WHO NEED TO VISIT THE SITE SHOULD PARK THEIR VEHICLES ON NARCISSA AND USE THE HORSE TRAIL TO WALK TO THE SITE. A PARKING SPACE SHOULD BE PROVIDED FOR THEM. VEHICLES USING THE DIRT ROAD WHICH WAS A NARROW FOOT AND HORSE TRAIL WILL CAUSE GREAT DANGER TO HIKERS AND RIDERS. THE VEHICLE WILL NOT BE ABLE TO STOP WHILE GOING DOWN HILL WITHOUT SKIDDING. UPHILL, THE VEHICLE WILL NOT BE ABLE TO STOP AND START ON SUCH A STEEP, CLIFF LIKE ROADWAY.

Utilities, page xiv

SOUTHERN CALIFORNIA EDISON COMPANY WROTE A LETTER OBJECTING TO THE UTILITY POLES GOING OVER, DOWN AND THROUGH KELVIN CANYON. THIS LETTER AND A MAP WAS SUBMITTED TO THE RDA AND SHOULD BE A PART OF THIS RECORD. THE EXHIBITS DO NOT CLEARLY SHOW POLE LOCATIONS.

Recreation

THE WELL IS LOCATED ON THE FAMOUS RATTLE SNAKE TRAIL USED FOR A VARIETY OF RECREATIONAL ACTIVITIES INCLUDING HORSEBACK RIDING, HIKING, MOUNTAIN CLIMBING, AND PARASAILING.

Cultural Resources

THERE IS A RUIN OF A WORLD WAR II GUNNERY AND OUTLOOK STATION WHICH WAS USED TO SPOT JAPANESE SUBS AND WARSHIPS OFF OF OUR COAST IN WW II. THIS HISTORIC STATION IS LOCATED 200' SOUTH OF THE WELL SITE AND HAS BEEN FURTHER VANDALIZED AFTER THE WELL AND ROAD WAS INSTALLED. THIS SITE MUST BE PROTECTED BEFORE FURTHER HARM OCCURS.

THE WELL SITS JUST ABOVE THE HEAD OF AN INDIAN MIDDEN. WITH THE PROJECT INCLUDING A ROAD AND ELECTRICAL POWER POLES, THE IMPACT TO THE MIDDEN MUST BE EVALUATED AND MITIGATED. THE ACTUAL MIDDEN IS LOCATED ON RATTLE SNAKE TRAIL JUST ABOVE THE SPRING IN THE CANYON. FURTHER DISTURBANCE OF THE SITE AND THE DIGGING OF POWER POLE HOLES AND INSTALLATION AT THE MIDDEN SITE WOULD BE DEVASTATING. IT APPEARS, BUT IS NOT CLEAR BY THE MAP, THAT THE POLES ARE TO BE PLACED ON RATTLE SNAKE TRAIL. MITIGATION MEASURES ARE REQUIRED.

THE NEW HON WELL LOCATED ON THE EAST SIDE OF KELVIN CANYON WHICH DR. ELIG WANTS TO DEWATER INSTEAD OF THIS SITE WOULD NOT HAVE AN IMPACT ON THE INDIAN MIDDEN, THE WORLD WAR II GUNNERY RUIN, NOR CREATE THE DEVASTATION TO A GNATCATCHER HABITAT BY SINKING POWER POLES THROUGHOUT WETLANDS.

SPRING IN AN ENVIRONMENTALLY SENSITIVE WAY? PERSONS WHO NEED TO VISIT THE SITE SHOULD PARK THEIR VEHICLES ON NARCISSA AND USE THE HORSE TRAIL TO WALK TO THE SITE. A PARKING SPACE SHOULD BE PROVIDED FOR THEM. VEHICLES USING THE DIRT ROAD WHICH WAS A NARROW FOOT AND HORSE TRAIL WILL CAUSE GREAT DANGER TO HIKERS AND RIDERS. THE VEHICLE WILL NOT BE ABLE TO STOP WHILE GOING DOWN HILL WITHOUT SKIDDING. UPHILL, THE VEHICLE WILL NOT BE ABLE TO STOP AND START ON SUCH A STEEP, CLIFF LIKE ROADWAY.

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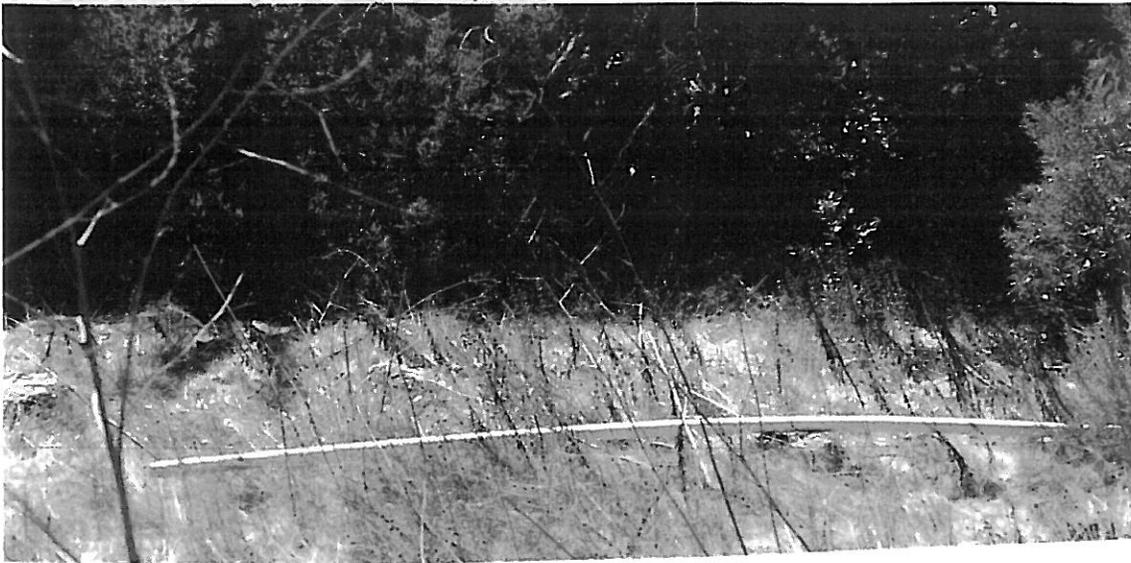
WETLANDS.

Aesthetics

ASK KEN BURRELL, ISLAND VIEW RIM RESIDENTS AND THOSE USING DEL CERRO PARK HOW THEY WILL ENJOY SEEING NEWLY PLACED POWER POLES DIRECTLY BELOW THEM. UTILITIES, BY CODE IN OUR CITY, ARE TO BE PLACED UNDERGROUND.

"The proposed project will have an impact on the existing visual environment on the westerly side of Kelvin Canyon by the construction of the discharge pipeline. This is not considered a significant aesthetic impact."

HAVING AN ABOVE GROUND DISCHARGE PIPE IN A STABLE AREA FAR ABOVE THE FORMER ACTIVE SLIDE AREA BRINGS BLIGHT TO THIS AREA AS NOTED IN THE EIR WHICH WAS CERTIFIED IN 1984 FOR THE CURRENT RDA. ABOVE GROUND UTILITIES HAVE A SUBSTANTIAL IMPACT AS SHOWN IN THIS PICTURE WHICH WAS TAKEN WITHIN FEET OF THE PROPOSED WELL. HAS CONSTRUCTION STARTED BEFORE THIS EIR IS CERTIFIED? WHY IS THIS UGLY PIPE ON SITE ON SEPTEMBER 28, 1996?



NOT ADHERING TO ESTABLISHED CITY CODE STANDARDS, IE NEW PIPES AND UTILITIES INSTALLED ABOVE GROUND, WILL NOT BE ACCEPTABLE NOR CAN IT BE JUSTIFIED ON THE PROPERTY OF MY IMMEDIATE NEIGHBOR. OVERHEAD UTILITIES HAVE BEEN A HEALTH AND SAFETY ISSUE WITHIN OUR CITY. FOR YEARS HOW CAN WE REQUIRE NEW CONSTRUCTION TO INSTALL UTILITIES UNDERGROUND BUT ALLOW THOUSANDS OF FEET OF ELECTRICAL WIRE ON 5 POLES DIRECTLY BELOW ISLAND VIEW & BURRELL, IN THE HIGHEST FIRE HAZARD AREA OF OUR CITY, TO BE INSTALLED OVERHEAD? THIS IS A STABLE AREA AND DOES NOT WARRANT THE BLIGHT. THE ABOVE GROUND PIPES AND UTILITIES HAVE BEEN ACCEPTED IN THE "ACTIVE" SLIDE AREA AND CAN BE JUSTIFIED THERE BUT NOT ON STABLE LAND.

KELVIN CANYON SPRING IS LOCATED CLOSE TO THE HIGH POINT AND ABOVE THE MID POINT IN THE CANYON, JUST BELOW RATTLESNAKE TRAIL. KELVIN EXTENDS DOWN TO SWEETBAY. PUMPING IT DRY OR SLOWING DOWN THE RATE OF FLOW MUST AND CAN BE MITIGATED BY U.S. FISH & GAME APPROVED WATERING BOWLS NOW IN USE IN OTHER LOCATIONS. IN ADDITION, CREATIVE WATER SUPPLIES NEED TO BE MADE AVAILABLE FOR THE WILLOWS, WALNUTS AND ALL NATIVE TREES AND PLANTS THAT RELY ON THE SPRING.

ALTERNATIVES SUMMARY MATRIX, page xxvi

THE ALTERNATIVE TO THIS "PROJECT" OF PLACING A DEWATERING WELL IN A MORE ACCESSIBLE AREA HAS BEEN SUGGESTED BY DR. ELIG. THIS DRAFT HAS FAILED TO CONSIDER THE MOST COST EFFECTIVE, ENVIRONMENTALLY SUPERIOR, ALTERNATIVE NOTED BY DR. ELIG. THE MONITORING WELL ON HON'S PROPERTY IS JUST EAST OF KELVIN CANYON, IS LOCATED ON A FIRE ROAD NOTED AS "CRENSHAW" ON THE LOCAL VICINITY, EXH 2, AND HAS POWER CLOSE BY. THE HON WELL, ALREADY IN PLACE, AVOIDS MANY SIGNIFICANT ENVIRONMENTAL EFFECTS AND FIRE HAZARDS. THE DISCHARGE PIPE COULD BE PLACED ALONG AN ALREADY ESTABLISHED FOOT TRAIL DOWN TO VANDERLIP DRIVEWAY. WATER BOWLS WOULD BE PROVIDED FOR WILDLIFE .

NO GNATCATCHER HABITAT WILL BE EFFECTED WITH HON'S WELL.

THE CITY SHOULD HAVE SUPPLIED VISTA WITH THIS INFORMATION AND IT MUST BE CONSIDERED IN THE EIR OR THE EIR WILL NOT BE ADEQUATE AND COMPLETE.

3.0 Project Description, page 17

Access Road VANDERLIP DRIVEWAY IS A **PRIVATE DRIVEWAY**. PLACING GRAVEL JUST ABOVE THE ENTRANCE TO THE TRAIL WOULD CREATE A MESS ON OUR DRIVEWAY WHEN THE RAINS COME. THE WATER DEPARTMENT USED GRAVEL MANY YEARS AGO AND IT ALL WASHED ONTO OUR DRIVEWAY AND DESTROYED THE SURFACE. FOR USE OF THE PRIVATE DRIVEWAY, THE PROJECT SHOULD RESURFACED THE DRIVEWAY IN RETURN FOR ITS USE. THE PROJECT NEEDS TO ENSURE THAT THEIR GRAVEL IS NOT CARRIED ONTO THE DRIVEWAY BY TIRES FROM THEIR VEHICLES OR THE RAIN. MUD TRACKS LEFT ON THE DRIVEWAY FROM OFFROADING IS OFFENSIVE AND UNSIGHTLY.

page 18. Power poles and lines need maintenance.

page 19 Approval of Easements. **HAVING AN EASEMENT GRANTED TO A**

REDEVELOPMENT AGENT SHOW UP ON THE LEGAL TO ONES PROPERTY IS THE KISS OF DEATH WHEN TRYING TO REFINANCE A HOME LOAN. IN ADDITION, THE CITY SHOULD BE GRANTED ALL EASEMENTS BECAUSE THEY WILL BE AROUND LONGER THAN RDA.

page 21 State Agencies: CALIF WATER RESOURCES BOARD SHOULD BE ADDED.

property owners: KATHY SNELL, OWNER OF WATER RIGHTS

page 23 VANDERLIP DRIVEWAY IS A PRIVATE DRIVEWAY NOT A ROAD

"...steep rugged slopes..." IS THE DESCRIPTION OF THE ACCESS ROAD. THIS CAN NOT BE A LEGAL ROAD UNDER CITY CODE AND SAFETY STANDARDS?

"...the project is located within the central portion of the RPV RDA Area..."
THE PROJECT IS LOCATED AT THE MOST NORTHERN POINT, ALMOST OUTSIDE OF RDA.

THE PROJECT SITE IS NOT LOCATED WITHIN THE ABALONE COVE LANDSLIDE. MY LAND IS NOT SLIDING AND THE SITE IS FURTHER NORTH, FAR AWAY FROM THE SLIDE.

page 24 "Rancho Palos Verdes Drive.." SHOULD BE PALOS VERDES DRIVE...

page 25 "Vanderlip Road" VANDERLIP DRIVEWAY, "Sweetbay Drive" S/B: ROAD

page 26 GALLONS PER MINUTE WAS AVAILABLE AND SHOULD BE INCLUDED.

page 30 THIS EIR NEEDS TO ALSO ANALYZE EFFECTS OF SLOWED DOWN WATER IN KELVIN CANYON DUE TO THIS PROJECT. THOSE RESULTS MAY BE THE WORST CASE.

page 31 THE CLOSEST URBAN LAND, WHICH IS REALLY CLOSE, TO WELL CONVERSION PROJECT IS BURRELL, ISLAND VIEW AND DEL CERRO PARK. LOOK AT YOUR MAP.

page 32 Discharge Pipe TWO HUNDRED FEET TO THE SOUTH TOWARD THE OCEAN HAS THE REMAINS OF THE WW II GUNNERY SITE, A FOUNDATION.

Access Road VANDERLIP DRIVEWAY

Exhibit 10. WITH THE GRIDS, I CAN NOT SEE WHERE THE POLES ARE GOING NOR CAN I FIGURE OUT WHERE THE LINE IS?

Exhibit 11 IF A IS A VIEW TO THE WEST, B IS NOT A VIEW TO THE NORTH.

EXHIBIT 12 VIEW C (SAYS NORTH BUT IS EAST) IS A CROPPED VIEW B (EAST) A TRUE VIEW NORTH WOULD SHOW HOW CLOSE DEL CERRO PARK IS. THIS WELL MAY BE LOCATED OUTSIDE OF THE RDA. HOW LONG WILL THE NEW DISCHARGE PIPE BE?

SITE PHOTO E DOESN'T SHOW OVERHEAD UTILITIES. WHY NOT SHOW HOW UGLY A POWER POLE SITTING NEXT TO THE BOX ON A WILDERNESS HIKING TRAIL, JUST BELOW A \$2,500,000+ HOME LOOKS?

SITE F IS NOT THE EASTERLY SIDE OF KELVIN CANYON. SITE F IS THE EASTERLY SIDE OF THE FARTHEST EAST FORK OF ALTAMIRA CANYON (AKA KATIE CANYON) AND BRANCHES OFF OF KELVIN CANYON BELOW THE SPRING. RATTLESNAKE TRAIL DOES NOT CROSS KATIE CANYON AS IT DOES KELVIN. IF THAT IS THE POWER SOURCE AND THE ROUTE IS DIRECT, TWO CANYONS, KELVIN AND KATIE CANYONS, WILL HAVE TO BE TRANSITED. THE EXACT ROUTE OF THE POLES NEEDS TO BE ADDRESSED IN THIS EIR AND EVALUATED. WHAT IMPACT WILL THERE BE ON KATIE CANYON?

page 38 "...and installation of power poles and lines from the easterly side of Kelvin Canyon to the existing monitoring well." DITTO (SITE F) THE REAL EASTERLY SIDE OF KELVIN CANYON HAS THE THICKEST COASTAL SAGE I HAVE EVER SEEN AND DOESN'T HAVE A POWER POLE. THE EAST SIDE OF THE TOP OF KATIE CANYON HAS A POWER POLE. THE NEW WELL WHICH SHOULD BE USED IS JUST UP THE FIRE ROAD.

"...no evidence..." DR. ELIG'S LETTER AND INFORMATION APPARENTLY WAS NOT SUPPLIED TO VISTA TO ENABLE VISTA TO DO AN ADEQUATE JOB.

page 39 "...include...power poles...lines" THERE ARE NO POWER POLES OR POWER LINES LOCATED ON THE WEST OR EAST SLOPE OF KELVIN CANYON. KELVIN CANYON IS A VERY UNIQUE, UNDISTURBED ECOSYSTEM. THE ILLEGAL 4 WHEEL DRIVE PATH, GUNNERY FOUNDATION AND ILLEGAL WELL ARE THE ONLY MAN-MADE IMPROVEMENTS ON EITHER SIDE OF THE "KELVIN CANYON."

"...no mitigation is possible..." YES, THE IMPACT CAN BE MITIGATED BY ALLOWING ENOUGH WATER IN THE STREAM TO SERVE THE NEEDS OF THE ANIMALS AND PLANTS. PROVIDE WATER BOWELS AS THE U.S. DEPT FISH & GAME AND THE CALIF. WILDLIFE SHOULD REQUIRE YOU TO.

page 40 VANDERLIP DRIVEWAY

"...will not ...result in the creation of an aesthetically offensive site open to public view." UNCONTROLLED LOWERING OF THE GROUNDWATER COULD ENDANGER THE THOUSANDS OF DEEP ROOTED TREES, INCLUDING PEPPER TREES. THIS MUST BE EVALUATED.

page 41 "The native vegetation in this area will not be altered..."

BUT THE GNATCATCHERS AND CACTUS WREN WILL BE DISTURBED. THEY SHOULD BE AVOIDED IN THIS WILDERNESS AREA.

Power Lines and Poles

IF THE POLES GO OVER RATTLESNAKE TRAIL, THE HORSE TRAIL WILL BE DESTROYED AS THERE IS NO ROOM FOR BOTH.

page 42 "No mitigation measures are available..." YES THERE IS BY UNDERGROUNDING THE UTILITIES.

"...visual character of the overall area from homes at higher elevations is not considered a significant impact." IT WILL BE ONCE THE GREEN BELT DIES.

page 43 "...cumulate aesthetic impact." YES IT IS WITH ALL OF THE ABOVE GROUND PIPES BEING INSTALLED IN THE STABLE AREA. ABOVE GROUND PIPES SHOULD BE LIMITED TO THE 80 SLIDE ZONE.

page 44 IS IS IMPOSSIBLE FOR STATION 56 LOCATED AT 12 CREST ROAD IN ROLLING HILLS TO PROVIDE EMERGENCY MEDICAL SERVICES TO THIS SITE UNLESS THEY DRIVE 20 MINUTES DOWN CREST TO HAWTHORNE TO PVDS, PASSING STATION 53, UP NARCISSA TO VANDERLIP, THEN HIKE 10 MINUTES TO THE SITE. THEY CAN FIGHT A FIRE MOVING UP THE STEEP MOUNTAIN AT DEL CERRO AS THEY DID LAST SUMMER.

Exhibit 15 DOES NOT SHOW WHERE STATION 56 (12 CREST ROAD WEST) IS. STATION 53 IS MARKED BUT IS NOT RESPONSIBLE FOR THE WELL SITE. IT IS UP TOO HIGH.

page 44 I HAVE TWO PAGES, THE FIRST ONE RECOUNTS HOW A BIRD ON A POWER LINE. THE SECOND ENDS WITH POWER LINES HAVE BEEN A FACTOR.

page 46 FIRE PROTECTION RESPONSE TIME TO THE WELL IS IMPOSSIBLE. EVEN WITH THE GRAVEL ROAD, THE FIRE DEPARTMENT WILL HAVE TO HIKE OR CALL IN AIR SUPPORT. WHEN THEY PUT THE SMOLDERING FIRE OUT NEAR THE WELL, THEY PARKED ON VANDERLIP AND HIKED UP THE ROAD. 40-45 MINUTES TO RESPOND TO THE SITE **WITHOUT EQUIPMENT** IS MORE REALISTIC IF THEY DO NOT USE HELICOPTER ASSISTANCE.

Fire Protection page 47 THE FIRE DEPARTMENT CAN REDUCE THE DANGER FROM OVERHEAD WIRING BY REQUIRING A SAFETY NET UNDER THE WIRE OR REQUIRING UNDERGROUNDING. WHAT ELSE CAN THEY REQUIRE FOR SAFETY?

page 49 Access Road VANDERLIP DRIVEWAY

INCREASE OF FIRE HAZARD WILL INCREASE BECAUSE OTHER 4 WHEEL DRIVE VEHICLES WILL USE THE ROAD. IF THEY TRY TO TURN AROUND, THE TIRE FRICTION FROM THEIR VEHICLE COULD START A FIRE (HAPPENED BEFORE).

"Project plans...comply with all applicable...building, electrical..codes..."
THEN THE UTILITIES MUST BE PLACED UNDERGROUND. A POWER POLE WAS HIT BY LIGHTENING AND A FIRE STARTED. IT TOOK OVER 30 MINUTES BEFORE THE FIRE DEPARTMENT ARRIVED BECAUSE EMERGENCY SERVICES WERE OUT AND THE FIRE DEPARTMENT DID NOT RECEIVED THE CALL PROMPTLY.

Plant Species Diversity

"The RDA area is floristically diverse more species are found in the RDA area than in most areas in the region of a similar size..."

MORE SPECIES ARE FOUND UP AND DOWN KELVIN CANYON BUT WE MAY NEVER KNOW THE VAST RICHNESS OF THE SITE WITHOUT PROTECTING IT.

page 53 "The canyon is one of several canyons with perennial water on the west side of the hill from San Pedro to Malaga Creek in Palos Verdes."
PLEASE LIST THE SEVERAL CANYONS. THIS IS THE ONLY NATURAL SPRING ON THE SOUTH SIDE OF THE PENINSULA.

page 57 "Pacific pocket mouse...determined that it is not present in the RDA area."

WHAT EVIDENCE DO YOU HAVE THAT THE POCKET MOUSE IS NOT LOCATED IN THE KELVIN CANYON SPRING ECOSYSTEM? PLACING TRAPS IN LOWER ALTAMIRA CANYON DOESN'T COUNT!

Exhibit 19 THE MAP INDICATES THAT THERE IS AN IMPRESSIVE GNATCATCHER AND CACTUS WREN AREA IDENTIFIED IN THE ROUTE OF THE POWER POLES. PLEASE SHOW THE EXACT PLACEMENT OF THE POLES, DISCUSS HOW ONE LIFTS THESE POLES INTO PLACE WITHOUT DISTURBING THE HABITATS.

page 59 NO ONE KNOWS WHAT UNIQUE OR RARE PLANTS OR ANIMALS ARE LIVING WITHIN THE 2,000 FEET LONG WETLANDS AND WHAT THE LOSS OF THE WETLANDS WILL DO.

page 60 THE INSTALLATION OF THE POLES WILL HAVE AN IMPACT ON BIOLOGICAL RESOURCES.

THERE IS NO "IMPROVED DIRT ROAD FOR THE GRAVEL TRUCK DELIVERIES. HOW MANY TRUCKS OF GRAVEL? HOW LONG IS THE ROAD? HOW STEEP? HOW WILL IT BE CONTOURED TO MEET SAFETY REQUIREMENTS? SINCE THE GRAVEL WILL BE COVERING A 100 YEAR OLD HORSE TRAIL, WHERE CAN THE HORSES RIDE, IN THE GNATCATCHER HABITAT NEXT TO THE ROAD?

"No other maintenance is required." THE CURRENT DEWATERING WELL PUMPS NEED MAINTENANCE. LOOK AT THE RECORDS. ELECTRIC METER WILL BE READ MONTHLY BY SCE.

page 61 Mitigation PROVIDE WATER FOR CALIFORNIA WALNUT, WILLOWS, ETC.

Access Road

KELVIN CANYON CROSSING BECOMES IMPASSIBLE DURING CERTAIN TIMES OF THE YEAR. IT IS ALSO ILLEGAL TO DRIVE THROUGH THE CANYON.

page 62 "The proposed project will reduce the total number of plants presently found in Kelvin Canyon by the elimination (or reduction) of the perennial water source."

FOR THIS EIR TO BE COMPLETE, THE PLANTS WITHIN THE WETLANDS SHOULD BE IDENTIFIED BEFORE THEIR DESTRUCTION. RARE PLANTS COULD BE HARVESTED.

"...mid-section" THE SPRING IS LOCATED IN THE UPPER SECTION OF THE CANYON.

"impact approximately 64 square feet..." PREVIOUS PAGE INDICATED 80 SQ FT.

MITIGATION OF LOSS OF WATER FOR PLANTS: SPRAY OR DRIP IRRIGATION POSSIBLE.

page 65 THE ENTIRE LENGTH OF THE WETLANDS MUST BE EVALUATED IN ORDER TO PROPERLY EVALUATE THE IMPACT FOR THIS EIR. KELVIN CANYON SPRING ECOSYSTEM IS ONE OF THE LAST, INACCESSIBLE AREAS WHICH COULD BE SUPPORTING RARE OR YET TO BE DISCOVERED PLANT OR WILDLIFE. NOISE LEVEL OF VEHICLE, BOTH AUTHORIZED AND UNAUTHORIZED, IS NOT ACCEPTABLE. NO VEHICLES SHOULD BE ALLOWED. WALK-IN ONLY.

page 66 CUMULATIVE IMPACT OF DEWATERING ALL WELLS WITHIN THE RDA SHOULD BE ADDRESSED. MILLIONS OF GALLONS OF WATER ARE BEING EXTRACTED BY ENVIRONMENTALLY UNAWARE PEOPLE WITHOUT EXPERT COORDINATION. WHAT LEVEL OF GROUND WATER DO THE DEEP ROOTED TREES REQUIRE?

TWO HAND CARVED STEATITE TRADING OBJECTS WERE RECENTLY DISCOVERED IN THE KELVIN CANYON ECOSYSTEM. STEATITE IS ONLY FOUND ON CATALINA ISLAND. BILL SAMARAS WHO DISCOVERED THE ONLY EXISTING FOSSIL OF THE PACIFIC GREY WHALE IN THE WORLD, IDENTIFIED THE TWO STONES ON SEPTEMBER 29, 1996. HE COMMENTED THAT THE POWI INDIANS, WHO LIVED ON CATALINA, USED THEIR BOATS TO COME TO PORTUGUESE BEND TO TRADE. MR. SAMARAS TOOK A SCRAPING OF THE TWO OBJECTS.

DONALD MOORE GALES, AUTHOR OF THE HANDBOOK OF WILDFLOWERS, WEEDS WILDLIFE AND WEATHER OF THE PALOS VERDES PENINSULA, DISCOVERED THE INDIAN MIDDEN ON THE RATTLESNAKE TRAIL IN THE BOTTOM OF THE CANYON. THE KELVIN CANYON SPRING WATER HAS BEEN USED HUNDREDS OF YEARS BY THE "LOCALS."

THE SITE OF THE POWER POLES CAN NOT BE LOCATED ON RATTLESNAKE TRAIL. USING HON'S NEW WELL WILL AVOID THESE ARCHAEOLOGICAL SITES.

page 72 THE WORD LANDSLIDE SHOULD BE LIMITED TO THE 80 ACRE SITE AND NOT BE USED INTERCHANGEABLY WITH STABLE LAND.

Exhibit 20 INDICATED THE PROPOSED WELL SITE IS OUTSIDE OF THE ANCIENT INACTIVE LANDSLIDE.

page 74 KELVIN CANYON IS THE MAIN EAST FORK OF ALTAMIRA CANYON. KATIE CANYON BRANCHES OFF OF KELVIN TO THE EAST.

Landslide Factors

"...bedrock dipping at the shallow angles toward the ocean..."

JUST ABOVE UPPER NARCISSA, THE BEDROCK DIPS AT THE SHALLOW ANGLES AWAY FROM THE BEACH WHILE THE SLIDE ZONE DIPS TOWARD THE BEACH.

page 75 THE ABALONE COVE BEACH LANDSLIDE WAS DISCOVERED IN 1974 BY DAVID LARUE SOUTH OF PALOS VERDES DRIVE SOUTH AT THE BEACH. A WARNING OF THE LANDSLIDE WAS REPORTED ON THE FRONT PAGE OF THE "PENINSULA NEWS" WITH A PICTURE OF THE SLIDE. THE LANDSLIDE INCREASED IN SIZE AFTER THE 100 YEAR STORMS IN 1977-78 AND CROSSED THE DRIVE AND CAUSED DESTRUCTION TO DWELLINGS IN 1978. THE SLIDE WAS ACTIVATED BY THE DUMPING OF WATER FROM NEW CONSTRUCTION NEAR ISLAND VIEW AND DEL CERRO PARK INTO ALTAMIRA CANYON.

THE EASTERN BOUNDARY OF PORTUGUESE BEND LANDSLIDE AND THE WESTERN BOUNDARY OF THE KLONDIKE CANYON LANDSLIDE APPEAR TO BE MOVING FASTER AFTER THE CITY ALLOWED DIRT REMOVAL FROM THE SUPPORT AREA TO PALOS VERDES DRIVE SOUTH.

page 79 DR. ELIG CLAIMS THAT THE 80 ACRE ABALONE COVE LANDSLIDE STOPPED.

page 80 "...installation in accordance with all...building code standards..." RANCHO PALOS VERDES CODES CLEARLY STATE THAT NEW CONSTRUCTION SHOULD BE UNDER GROUND. SCE DOESN'T WANT THE POLES TO CROSS THE CANYON(S).

page 81 WATER QUALITY TESTING OF DISCHARGE PIPE SHOULD BE MONITORED AS FREQUENTLY AS THE PUMPING STATIONS DUE TO THE POTENTIAL OF SEWAGE DISCHARGE ONTO THE BEACH.

Altamira Canyon WATER RUNS FROM ISLAND VIEW STREET DRAINS ALL YEAR LONG. ASK LOIS LARUE.

page 87 THE KELVIN CANYON SPRING DOES IS NOT LOCATED IN THE MID-SECTION OF KELVIN CANYON. IT IS LOCATED TOWARD THE MOST NORTHERN PART.

page 90 WATER RESOURCES: THE RESULTS OF THE PROJECT WILL INTERFERE SUBSTANTIALLY WITH GROUND WATER RECHARGE AND DR. ELIG'S MEMO WILL CONFIRM THIS. (CITY HAS A COPY AND IT SHOULD BE EVALUATED).

page 93 DRIVING THROUGH A BLUE LINE STREAM ALTERS THE BED.

APPROVAL AND NOTICE TO CALIFORNIA WATER RESOURCES BOARD IS NECESSARY WHEN YOU PLAN TO TAKE WATER AND WHEN YOU PLAN ON DUMPING THE WATER IN THE OCEAN (NON-DRINKING WATER INCLUDED).

page 94 City attorney ALL RIPARIAN USERS (INCLUDING PLANTS, ANIMALS AND PEOPLE) NEED THE CITY TO GUARANTEE THE NON-POTABLE WATER SUPPLY IN PERPETUITY. THERE IS NO GUARANTEE THAT THE RDA WILL REMAIN IN EXISTENCE.

ROAD LENGTH MUST BE ADDRESSED.

page 95 HOW MANY GALLONS PER MINUTE CAN BE PUMPED FROM WELL IN THE PIPE SIZE?

page 96 "project will meet applicable Building Codes..." THEN PUT THE UTILITIES UNDERGROUND.

page 96 "...shall execute and cause to be recorded a waiver..." WHAT WAIVER? RECORDING A DOCUMENT WITH RDA-"SLUM CLEARANCE" WOULD BE A DISASTER AND IS UNACCEPTABLE. IF ONE HAS RECORDED RIPARIAN RIGHTS WITH THE CALIFORNIA WATER RESOURCES BOARD AND THE PROJECT IS TAKING RIGHTS AWAY...THE CITY NEEDS TO SIGN THE AGREEMENT, NOT ME.

page 98 ALTERNATIVES TO THE PROPOSED PROJECT

THE CITY SHOULD HAVE PROVIDED VISTA WITH DR. ELIG'S RECOMMENDATIONS TO USE THE NEW HON WELL OFF OF CRENSHAW EXTENSION WHICH IS NEAR TO POWER AND HAS A SAFE ROAD TO IT. OTHER WELLS ARE IN THE AREA AND WILL PROBABLY BE DEWATERED. THIS SITE VERY COST EFFECTIVE WITH EASY ACCESS AND NOT FIRE HAZARD. THIS EIR SHOULD HAVE USED IT AS AN ALTERNATIVE DURING THE ENVIRONMENTAL REVIEW. THIS SITE SELECTION WOULD ALSO SAVE THE 80 SQ FT GNATCATCHER HABITAT AND THE INDIAN MIDDEN.

page 111 WITH THE DEVASTATION AND REMOVAL OF A GNATCATCHER HABITAT AT THE SITE OF THE WELL UNDER INVESTIGATION, I WOULD HOPE THAT OUR CITY WOULD KNOW UNDERSTAND THE IMPACT BEFORE ALLOWING "BORING PERMITS."

page 114 Del Cerro Park SO CAL EDISON SAYS THAT THIS POWER CONNECTION IS THE ONLY FEASIBLE SOURCE. THIS NEEDS FURTHER EVALUATION.

THE EIR SHOULD DISCUSS THE IMPACT OF THIS PROJECT TO CONFORM TO CORPS OF ENGINEERS, DEPARTMENT OF THE ARMY 33 CFR PARTS 320 THROUGH 330. THE EIR SHOULD DISCUSS THE POTENTIAL IMPACT AND MITIGATION TO THE RIPARIAN WATER RIGHTS WHICH THE ANIMAL, PLANTS AND I HAVE ESTABLISHED IN PERPETUITY. I DO NOT WISH TO GIVE THEM UP OR HAVE TAKEN.

THE CITY MUST OBTAIN PERMISSION FROM THE RIPARIAN USERS TO PUMP THE MONAHAN (ABALONE COVE) WELL WHICH WILL DEplete THE KELVIN CANYON SPRING. THE LOSS OF RIPARIAN WATER RIGHTS MUST BE ADDRESSED AND MITIGATED. THE MITIGATION MUST LAST IN PERPETUITY.

THE U.S. ARMY CORP OF ENGINEERS, STATE OF CALIFORNIA WATER RESOURCES BOARD AND CALIFORNIA FISH & GAME, TO ONLY NAME A FEW AGENCIES, ALL REQUIRE PERMITS AND/OR APPROPRIATE MITIGATION. WASTEFUL DISPOSAL OF ANY QUALITY OF WATER IS NOT PERMITTED. THE WASTEFUL DUMPING OF SPRING WATER IS PROHIBITED BY MANY GOVERNMENTAL AGENCIES AND SHOULD BE ADDRESSED. ALTERNATIVES TO USING KELVIN CANYON SPRING WATER, WHICH THE WELL WILL PUMP, SHOULD BE ADDRESSED.

"The proposed Abalone Cove Well Conversion project..."

THIS IS **NOT** A WELL CONVERSION PROJECT. PROPER PERMITS WERE NOT OBTAINED TO DRILL A WELL. THE DEVELOPER MERELY CAPPED OFF A HOLE WHICH WAS BORED TO OBTAIN SOIL SAMPLES. WATER WELLS ARE **FORBIDDEN** ON THIS PROPERTY AS COVERED IN THE GRANT DEED.

THE DISCHARGE OF WATER WILL BE MADE DIRECTLY ONTO A BEACH WHICH IS NOT PRIVATE PROPERTY. COASTAL COMMISSION PERMISSION???

ONGOING TESTING OF THE DISCHARGED WATER SHOULD BE PROVIDED TO PROTECT THE OCEAN FROM POLLUTION. NO PREVIOUS EIRS WERE COMPLETED TO DETERMINE THE IMPACT OF WATER DISCHARGED AT THE BEACH. THE IMPACT SHOULD BE EVALUATED.

THE EIR MUST DISCUSS WHAT PROCESS WOULD HAVE BEEN NECESSARY IF THE WELL AND THE "DIRT ROAD" WERE CONSTRUCTED ILLEGALLY AND WITHOUT DUE PROCESS. VALUABLE GNATCATCHER AND CACTUS WREN HABITAT WERE LOCATED NEAR OR WHERE THE "WELL" IS NOW PLACED. ONE OF THE PROJECT'S POWER POLLS IS NEAR OR ON THE PALOS VERDES BLUE BUTTERFLY HABITAT. THE PROJECT AREA MUST INCLUDE ENTIRE AREA OF ELECTRIC LINES, WATER LINES AND ACCESS TRAILS FOR PROPER EVALUATION OF IMPACT AND MITIGATION.

OPERATING A MOTOR VEHICLE IN THE WEEDS AND ON A HORSE TRAIL IS IN DIRECT VIOLATION OF THE RANCHO PALOS VERDES MUNICIPAL CODES, LOS ANGELES COUNTY CODES AND THE COASTAL SPECIFIC PLAN. DRIVING A VEHICLE OVER WEEDS IN THIS AREA CAUSED A FIRE WHEN A TIRE SPUN ON DRY WEEDS. ANOTHER FIRE WAS STARTED BY A FOUR WHEEL DRIVE'S CATALYTIC CONVERTER SPARKING ON WEEDS. USING THE "DIRT ROAD" IS UNSAFE AND SHOULD BE ADDRESSED.

THE EDISON COMPANY HAS ALREADY TOLD THE CITY STAFF THAT CROSSING KELVIN CANYON WITH POWER POLES IS NOT FEASIBLE SO THE CITY STAFF HAS DECIDED TO INSTALL "PRIVATE" POLES AND HAVE THE METER READ NEAR THE NEW WELL ON HON'S PROPERTY WHICH SHOULD BE CONSIDERED AS AN ALTERNATIVE. THIS DRAFT HAS FAILED TO ADDRESS THE FEASIBILITY OF POLES PLACED IN KELVIN CANYON BASED ON SO CAL EDISON'S VIEWPOINT.

THE DEWATERING WELL ON SWEETBAY NEAR KELVIN CANYON PRODUCES A LOT OF WATER MAKING THIS PROJECT UNNECESSARY. DEWATERING THIS HIGH UP IS A WAY TO HAVE THE HORAN MONIES PAY TO STOP WATER FROM ENTERING PORTUGUESE BEND SLIDE. THOSE IN PB SLIDE DO NOT HAVE LIENS ON THEIR HOMES TO PAY FOR THE WELLS.

DEWATERING THE MONAHAN WELL WILL CAUSE CONSIDERABLE DAMAGE TO OVER 2,000 FEET OF A YEAR ROUND SPRING AND THE RIPARIAN USERS. THE FIRE POTENTIAL, WHICH THE ELECTRICAL LINES WILL BRING INTO A RURAL AREA COULD CAUSE, IS GREAT. HAVING VEHICLES DRIVE IN AREAS WHICH ARE RESTRICTED TO MOTOR TRAFFIC, INCLUDING ATV'S, IS VERY DANGEROUS.

AIR MOVEMENT WILL CHANGE WHEN THE TREES DIE FROM LACK OF WATER. MOISTURE, TEMPERATURE AND A CHANGE IN CLIMATE AT A LOCAL LEVEL WILL OCCUR. THE TEMPERATURE ALONG THE SPRING IS NOW 10-20 DEGREES COOLER THAN OTHER AREAS.

THIS PROJECT WILL SUBSTANTIALLY INTERFERE WITH THE GROUND WATER RECHARGE EFFECTING KELVIN CANYON SPRING AND CAUSE DEGRADATION OF THE KELVIN CANYON SPRING WATER QUALITY. CALIFORNIA WATER RESOURCES BOARD AND THE U.S. ARMY CORPS DO NOT APPROVE OF DUMPING OR WASTING WATER, EVEN THOUGH IT IS NOT DRINKING QUALITY.

KELVIN CANYON SPRING SUPPLIES THE ONLY FRESH WATER ON THE SOUTH SIDE OF THE PENINSULA FOR MIGRATORY AND LOCAL BIRDS, WILD ANIMALS, ORGANISMS AND INSECTS. WILDLIFE HABITAT WILL DETERIORATE WHEN THE SPRING'S SOURCE IS REMOVED THROUGH PUMPING THE WELL.

THE PRESENT AND FUTURE LAND USE OF THE AREA SOUTH OF VANDERLIP DRIVEWAY IN KELVIN CANYON SPRING IS A PROTECTED WILDLIFE HABITAT, ESTABLISHED AND PROTECTED IN PERPETUITY BY THE SNELL/PILOT FAMILY. WITHOUT THE GUARANTEE OF A SOURCE OF WATER IN PERPETUITY, THE HABITAT WILL BE DESTROYED.

THE SPRING WATER NOW BEING USED FOR AGRICULTURAL PURPOSES

INTRODUCING ELECTRICAL POWER ABOVE GROUND, IN DIRECT VIOLATION OF HEALTH AND SAFETY REQUIREMENTS FOR UNDER GROUNDING UTILITIES IN RANCHO PALOS VERDES, COULD CAUSE A FIRE, ESPECIALLY DURING AN EARTHQUAKE. ALL OTHER POWER LINES IN THE AREA ARE PLACED ON A "FIRE ROAD."

NO ELECTRIC LINES SHOULD SPAN OVER A KNOWN GNATCATCHER HABITAT.

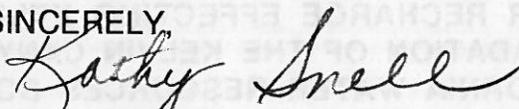
SEWER DEMAND COULD INCREASE SUBSTANTIALLY IF DISCHARGE WATER FROM ACLAD/RDA PIPES ARE REQUIRED TO BE DISCHARGED INTO A SEWER SYSTEM AND NOT DIRECTLY INTO THE BEACH AREA DUE TO POOR QUALITY OF WATER. THIS EIR SHOULD ADDRESS THIS ISSUE.

POTENTIAL MOSQUITO INFESTATION WHEN KELVIN CANYON SPRING FLOW

SLOWS DOWN WILL CAUSE POCKETS OF WATER FOR BREEDING. NORMAL FLOW OF SPRING DOESN'T ALLOW WATER TO STAGNATE. A SOMETIMES FATAL DISEASE CALLED DESQUE FEVER, CAUSING INTERNAL BLEEDING, COMA AND SHOCK, WAS INTRODUCED INTO THE U.S. FROM MEXICO BY MOSQUITO AND CAN BE DEADLY.

Let's move the well site to the new Hon well, provide water for the animals and specific willow and walnut trees, protect my water rights without a document recorded against my property and move ahead. To safeguard the kids, it is important that the discharge water at the beach be checked. Wasting any more money on Monahan well is not fair to the people who have to pay their liens.

SINCERELY,



KATHY SNELL



April 2, 1996

RPV Agency Members:

The staff recommendation to continue the project of dewatering the Kelvin Canyon Spring by pumping the Monahan well is flawed.

The project will be far more expensive than the \$10,000.00 which your staff has estimated. The dewatering of the Monahan well will devastate a blue line stream as noted in the EIR for Altamira Canyon Drainage Control Project and may bring the U.S. Army Corp of Engineers into the RPV Agency business.

Holding this project until a decision is made regarding the "Horan" lien money will not effect the Abalone Cove landslide mass. Going ahead with the project, budgeting only \$10,000.00 for a project which should have at least \$35,000.00 budgeted, will have an adverse effect on wetlands and may expose the city and agency to litigation.

The EIR must address alternatives to the planned project. The mitigation for destroying the only remaining wetlands on the south side of the Peninsula will be costly. In addition, taking water rights from a riparian user may increase the expense of this project.

Dr. Elig and Mr. Griffin, among others, have been after Kelvin Canyon stream for years. If pumping out the well is an emergency, Dr. Elig would have moved to take the spring in the 1980's.

Please postpone this project for a few months until the entire picture of what the Agency will be doing can be evaluated.

Respectfully,

Kathy Snell

CC: Abalone Cove Well Conversion Project
Draft EIR 9-30-96

RECEIVED
APR 18 1996



Regional Information Center
Los Angeles, Orange, Ventura Counties

April 8, 1997

City of Rancho Palos Verdes
Department of Public Works
30940 Hawthorne Blvd.
Rancho Palos Verdes, CA 90275

RE: Notice of Completion for the Abalone Cove Well Conversion Project Draft
Revised and Recirculated Environmental Impact Report.

Dear Mr. Allison:

Thank you for submitting the above referenced draft revised and recirculated EIR to our office for review. I concur with your assessment that all but the "No Project/No Development" option will have the same or greater level of impacts to cultural resources as the project itself. The areas in question are considered sensitive for cultural resources and archaeological sites are known for the project vicinity.

If this office can be of further assistance, please let us know.

Sincerely,


Phyllisa J. Eisentraut
Coordinator

RECEIVED
City of Rancho Palos Verdes

APR 16 1997

PUBLIC WORKS DEPARTMENT



DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
911 WILSHIRE BOULEVARD
LOS ANGELES, CALIFORNIA 90017
April 10, 1997

REPLY TO
ATTENTION OF:

Office of the Chief
Regulatory Branch

City of Rancho Palos Verdes
Department of Public Works
Attn: Dean E. Allison
30940 Hawthorne Boulevard
Rancho Palos Verdes, California 90275

RECEIVED
City of Rancho Palos Verdes
APR 14 1997

Dear Mr. Allison:

It has come to our attention that you plan to construct/repair a monitoring well and associated structures near Abalone Cove in the City of Rancho Palos Verdes, Los Angeles County, California. This activity may require a U.S. Army Corps of Engineers permit.

A Corps of Engineers permit is required for:

a) structures or work in or affecting "navigable waters of the United States" pursuant to Section 10 of the Rivers and Harbors Act of 1899. Examples include, but are not limited to,

1. constructing a pier, revetment, bulkhead, jetty, aid to navigation, artificial reef or island, and any structures to be placed under or over a navigable water;

2. dredging, dredge disposal, filling and excavation;

b) the discharge of dredged or fill material into, including any redeposit of dredged material within, "waters of the United States" and adjacent wetlands pursuant to Section 404 of the Clean Water Act of 1972. Examples include, but are not limited to,

1. creating fills for residential or commercial development, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossings, backfilling for utility line crossings and constructing outfall structures, dams, levees, groins, weirs, or other structures;

2. mechanized landclearing, grading which involves filling low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the United States;

3. allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the United States;



4. placing pilings when such placement has or would have the effect of a discharge of fill material;

c) any combination of the above.

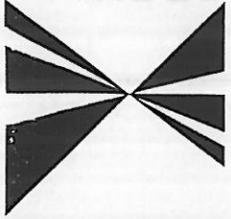
Enclosed you will find a permit application form and a pamphlet that describes our regulatory program. If you have any questions, please contact me at (213) 452-3413.

Sincerely,

Aaron Allen
Project Manager
Regulatory Branch

Enclosures

SOUTHERN CALIFORNIA



ASSOCIATION of GOVERNMENTS

April 21, 1997

Mr. Dean E. Allison
City of Rancho Palos Verdes
Department of Public Works
30940 Hawthorne Boulevard
Rancho Palos Verdes, CA 90275



Main Office

515 West Seventh Street
12th Floor
Los Angeles, California

90017-3435

(213) 236-1800

(213) 236-1825

www.scag.ca.gov

RE: SCAG Clearinghouse #I9700138
Notice of Completion for Abalone Cove Well Conversion

Dear Mr. Allison:

We have reviewed the above referenced document and determined that it is not regionally significant per Areawide Clearinghouse criteria. Therefore, the project does not warrant clearinghouse comments at this time. Should there be a change in the scope of the project, we would appreciate the opportunity to review and comment at that time.

A description of the project was published in the **April 15, 1997** Intergovernmental Review Report for public 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) 236-1833 or Bill Boyd at (213) 236-1960.

Sincerely,

VIVIANE DOCHE
Manager, Intergovernmental Review

VD:lj

RECEIVED
City of Rancho Palos Verdes

APR 22 1997

PUBLIC WORKS DEPARTMENT

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First Vice President: Supervisor
Countywide Burke, Los Angeles County •
President: Mayor Bob Bartlett,
Monrovia • Immediate Past: President
Bob Buster, Riverside

County of Imperial: Sam Sharp, Imperial County
Executive Center

County of Los Angeles: Yvonne Braunwate Burke,
Santa Anita • Eugene Marston, Los Angeles
County • Eileen Ansari,
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Wagner, Los Angeles • Joel Wachs, Los Angeles •
Walter Waters, Los Angeles • Judy Wright, Claremont
San Juan, South Pasadena

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County • Ron Bates, Los Alamitos • Art Brown,
Newport Beach • Ian Debat, Newport Beach • Richard
Vicki Forest • Sandra Genis, Costa Mesa •
Linda Higgard, San Clemente • Willy Linn, La
Brea • Bev Perry, Brea

County of Riverside: Bob Buster, Riverside
County • Dennis Draeger, Calimesa • Dick Kelly,
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Santa Ana • Jim Bagley, Twentynine Palms •
Andre Bennett, Colton • David Ebleman, Fontana
• Sam Miller, San Bernardino • Gwenn Norton,
Chino Hills

County of Ventura: Judy Mikels, Ventura County •
Steve Fox, Thousand Oaks • San Daily, Camarillo
• Don Mettler, Santa Paula



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1900
Telephone: (310) 699-7411, FAX: (310) 695-6139

Chief Engineer and General Manager

May 7, 1997

File No: 05-00.04-00

Mr. Dean E. Allison
City of Rancho Palos Verdes
Department of Public Works
30940 Hawthorne Boulevard
Rancho Palos Verdes, CA 90275

RECEIVED
City of Rancho Palos Verdes
MAY 09 1997

PUBLIC WORKS DEPARTMENT

Dear Mr. Allison:

Abalone Cove Well Conversion Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on April 1, 1997. The proposed development is located within the jurisdictional boundaries of District No. 5. We offer the following comment regarding sewerage service:

- The Districts maintain facilities within the project area; however, they will not be affected.

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

Very truly yours,

Charles W. Carry

Marie L. Pagenkopp
Engineering Technician
Planning & Property Management Section

MLP:jl

Kathy Snell
#8 Vanderlip Driveway (private)
Rancho Palos Verdes, Ca. 90275
May 14, 1997 (310) 541-1266

Mr. Dean E. Allison, P.E., Senior Engineer
Public Works Department
City of Rancho Palos Verdes
30940 Hawthorne Boulevard
Rancho Palos Verdes, California 90275-5391

Re: ABALONE COVE WELL CONVERSION PROJECT
DRAFT REVISED AND RECIRCULATED
DRAFT ENVIRONMENTAL IMPACT REPORT

RECEIVED
CITY OF PALM BEACH
MAY 15 1997
PUBLIC WORKS DEPARTMENT

Dear Mr. Allison:

Page 1, Purpose and Contents

THE CITY AND RDA HAVE WITHHELD INFORMATION FROM VISTA WHICH HAS LED TO THE IMPROPER AND INCOMPLETE ASSESSMENT OF THIS PROJECT. THE MEMO WRITTEN BY DR. ELIG SUGGESTING AN ALTERNATIVE WELL IS ONLY ONE EXAMPLE OF THE INFORMATION WHICH HAS BEEN WITHHELD FROM VISTA. THE DRAFT RREIR DOES NOT ADEQUATELY DISCUSS POSSIBLE WAYS TO REDUCE OR AVOID POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACTS.

"...various methods taken by the RDA to provide public review and receive public comment..."

HAVING A DEWATERING WELL SO FAR AWAY FROM AND EAST OF THE FORMER "ABALONE COVE" LANDSLIDE IS MOTIVATED BY THE DESIRE TO USE "HORAN" MONIES TO MITIGATE THE ACTIVE "PORTUGUESE BEND" SLIDE. AT LEAST 50% OF THE \$100,000.00+, WHICH THIS PROJECT HAS COST, SHOULD BE CHARGED TO THE PORTUGUESE BEND SLIDE BUDGET AS MUCH OF THE WATER PUMPED OUT OF THESE WELLS WOULD FLOW UNDERGROUND TOWARD INTO THE PORTUGUESE BEND SLIDE IF NOT REMOVED. REFERENCE DR. ELIG'S MEMO WHICH STATES THAT DEWATERING THESE WELLS WILL KEEP GROUND WATER FROM ENTERING THE ACTIVE PORTUGUESE BEND SLIDE. THIS PROJECT DOES NOT MEET THE PROJECT DESCRIPTION (#15).

Page 2, General Purpose "The EIR addresses the potential environmental impacts..."

THE EIR FAILS TO ADDRESS THE IMPACT TO THE VEGETATION DOWNHILL BY LOWERING GROUND WATER UP SLOPE. MITIGATION MUST BE DISCUSSED.

Page 5, Introduction “...to evaluate the environmental effects...”

THIS DOCUMENT IS INADEQUATE BECAUSE IT FAILS TO EVALUATE THE GROUND WATER LEVELS NEEDED TO SUSTAIN THE HUNDREDS OF PEPPER TREES AND VARIOUS OTHER DEEP ROOTED TREES DOWN SLOPE FROM THE PROPOSED WELL.

Page 6, Introduction

“The Ceqa Guidelines Section 15126 (d) requires that an EIR...which could reasonably attain most of the basic objectives of the project...”

The project description: “The implementation of improvements to lower the groundwater level in the Abalone Cove Landslide area.”

DR. ELIG HAS WRITTEN THAT DEWATERING THE “ABALONE COVE” WELL AND/OR THE HON WELL WILL PREVENT GROUND WATER FROM ENTERING THE PORTUGUESE BEND SLIDE. THE CITY SHOULD PRODUCE DR. ELIG’S CORRESPONDENCE FOR EVALUATION BY VISTA FOR THIS EIR. AN ANALYSIS OF THE PATH OF THE GROUND WATER SHOULD BECOME A PART OF THIS EIR TO ENSURE THAT THE PROPOSED PROJECTS MEET THE PROJECT DESCRIPTION.

Page 7 , Summary of Alternatives

Alternative 1: “No Project/No Development; Environmentally Superior, No...”

THE “NO PROJECT” CHOICE IN A HIGH FIRE HAZARD AREA AND ON UNDEVELOPED LAND IS ENVIRONMENTALLY SUPERIOR. ALL PRODUCING WELLS SHOULD BE IN DEVELOPED AREAS AND NOT POSE A THREAT TO RESIDENCES AND THE ENVIRONMENT.

Alternative 2 - Site 1

“Alternative Site 1 would require drilling a new well.”

THERE NOW EXISTS ANOTHER MONITORING WELL JUST WEST OF THE PROPOSED PROJECT SITE DRILLED BY MONAHAN.

Page 9, “Alternative 2 Other Well Locations - Hon Well Site”

“A discharge pipeline will be extended from the well to an existing discharge line approximately 3,500 feet to the south.”

EXTENDING THE DISCHARGE PIPELINE 3,500 FEET SOUTH IS NOT THE CORRECT DISCHARGE PATH. THE DISCHARGE PIPE SHOULD FOLLOW THE SAME ROUTE AS DESCRIBED ON PAGE 8, ALTERNATIVE 2, SITE 2.

IN ADDITION, "...3,500 FEET SOUTH..." IS REALLY EAST INTO THE PORTUGUESE BEND SLIDE. IF ABALONE COVE WATER IS GOING TO BE PUMPED INTO THE ACTIVE PORTUGUESE BEND SLIDE, THE DISCHARGE PIPES WILL BE SUBJECT TO FAILURE DUE TO SLIDE MOVEMENT. THE DANGERS OF WATER POURING INTO PORTUGUESE BEND SLIDE SHOULD BE EVALUATED IN THIS EIR.

THE DISCHARGE PIPE USED FOR DEWATERING KELVIN CANYON SPRING SHOULD BE ROUTED DOWN THE FIRE ROAD RUNNING ON THE EAST SIDE OF THE CANYON TO THE EXISTING NARCISSA/VANDERLIP DISCHARGE LINE WHICH IS LOCATED ON STABLE LAND.

PROVIDING THAT THE DISCHARGE PIPE IS INSTALLED "...3,500 FEET TO THE SOUTH..." (REALLY EAST), THE DISCHARGE LINE WILL BE PLACED IN AN ACTIVE LANDSLIDE AREA OF THE PORTUGUESE BEND SLIDE. THE AREA THE PIPE IS PROPOSED TO RUN, ALTERNATIVE 2-HON WELL, JUST RECENTLY SUFFERED A MAJOR LAND FAILURE WHICH RESULTED IN THE EXISTING DISCHARGE PIPE BREAKING. THE WELL WATER FROM THE PIPE POURED INTO DEPRESSIONS IN THE EARTH AND FURTHER AGGRAVATED THE ACTIVE PORTUGUESE BEND SLIDE. WELLS HAD TO BE TURNED OFF UNTIL THE PIPE COULD BE MOVED.

UNLESS THE ROUTE OF THE HON DISCHARGE PIPE IS CHANGED TO RUN TO NARCISSA/VANDERLIP, THIS EIR IS INCOMPLETE BECAUSE THE ENVIRONMENTAL RISK OF PIPING WELL WATER INTO A VERY ACTIVE LANDSLIDE FROM A STABLE AREA HAS NOT BEEN EVALUATED. FURTHER, THE EIR IS INCOMPLETE BECAUSE RIPARIAN USERS WILL NOT HAVE ACCESS TO THE WATER AS DISCUSSED IN THE DRAFT EIR.

IF FUNDED BY THE HORAN LIEN MONIES, THE HON WELL DISCHARGE LINE, LIKE SITE 2, SHOULD BE ROUTED TO NARCISSA/VANDERLIP EXISTING LINE TO PLAN FOR FUTURE DEWATERING WELLS IN ACLAD/HORAN/ABALONE COVE LANDSLIDE AREA.

TO REDUCE AND ELIMINATE THE SIGNIFICANT ENVIRONMENTAL EFFECTS, THE WELL WATER CAN BE THE SOURCE OF "WATERING HOLES" ALONG THE SIDE OF THE CANYON FOR THE USE OF THE RIPARIAN USERS. USING WELL WATER TO SUPPLY WILDLIFE WATERERS SHOULD BE DISCUSSED AS MITIGATION FOR DRYING UP THE KELVIN CANYON SPRING WHICH HAS PROVIDED WATER FOR HUNDREDS OF YEARS. WITH THE NEW HON DRAIN PIPE ROUTE, THE RREIR HAS FAILED TO DISCUSS MITIGATING THE LOSS OF WATER FROM A BLUE LINE STREAM.

Page 11, Alternative 4, Alternative Access - Kelvin Canyon

"The well could be accessed from a roadway constructed across Kelvin Canyon."

IT IS IMPOSSIBLE WITHOUT CONSTRUCTING A BRIDGE.

TECHNICALLY FEASIBLE, NO. ECONOMICALLY FEASIBLE, NO.

Alternative 5, Altamira Watershed Pipeline

THE RESIDENTIAL DEVELOPMENTS ABOVE THE PROJECT AREA, VALLEY VIEW, DEL CERRO, AND ISLAND VIEW ARE ALREADY DRAINING INTO ALTAMIRA CANYON. ALL THAT IS NEEDED IS TO TRANSPORT THEIR RUNOFF TO THE OCEAN IS: A PIPE PLACED ALONG SIDE OF ALTAMIRA CANYON; A CONNECTION TO THE SEWER; OR, A PIPE DISCHARGING WATER ONTO CREST. NO RESIDENTIAL HOOKUPS ARE NEEDED. NO TRENCHING THE CANYON IS NEEDED. KEEP IT SIMPLE.

Page 12, Alternative 6 Multiple Well Sites -Abalone Cove and Hon

"...periodic maintenance of the discharge line..."

IF THE LINE IS PLACED "3500 FEET SOUTH" (EAST) OF HON WELLS, CONTINUAL MAINTENANCE AND DAILY INSPECTION WILL BE NECESSARY DUE TO THE ACTIVE PORTUGUESE BEND LANDSLIDE. IF THE LINE IS RUN ON STABLE LAND SOUTH TO THE NARCISSA/VANDERLIP WELL, "PERIODIC" MAINTENANCE WILL BE MORE THAN ADEQUATE. ONLY YEARLY INSPECTION WILL BE NECESSARY.

IF THE POWER LINES ARE EXTENDED OVER KELVIN CANYON, THE EDISON WILL FIND IT VERY DIFFICULT, IF NOT IMPOSSIBLE, TO INSPECT THE LINES.

Page 14, Alternatives Summary of Impacts

"NO PROJECT" WILL ELIMINATE THE IMPACT.
THE HON WELL AND SITE 2 WILL RESULT IN LESS IMPACT THAN THE PROPOSED PROJECT BECAUSE THE POWER POLES ARE LOCATED ON AND NEXT TO A FIRE ROAD.
SOLAR WILL HAVE LESS IMPACT.

ALTERNATIVE 4 ACCESS OVER KELVIN CANYON WILL HAVE A GREATER IMPACT THAN THE PROPOSED PROJECT.

HON 6 WILL INCREMENTALLY INCREASE THE DEMAND FOR FIRE PROTECTION OVER THE PROPOSED PROJECT.

A FIRE WAS STARTED AT DEL CERRO PARK AND BURNED DOWN TO THE PROJECT WELL SITE. THE FIRE DEPARTMENT HAD DIFFICULTY FIGHTING THE FIRE ON THE FACE OF THE CLIFF. THE WATER DROPPING HELICOPTERS WERE CALLED OUT TO FIGHT THE FIRE. L.A. COUNTY HAS NOW ENDED THE LEASE OF THESE HELICOPTERS. FURTHER FUNDING CUTS ARE EXPECTED TO IMPACT THE LOCAL FIREHOUSES. THE HON WELL SITE IS LOCATED OFF OF A FIRE ROAD. **ALL WELLS SHOULD BE LOCATED ON A FIRE ROAD OR IN AN ACCESSIBLE AREA.** THE PROJECT SITE IS NOT REASONABLY ACCESSIBLE.

Page 16

ALTERNATIVE 1, "NO PROJECT" WILL ELIMINATE THE IMPACT ON EXISTING BIOLOGICAL RESOURCES AND THE GNATCATCHER.

SITE 1: 3 /3 (WELL MUST BE DUG)

HON 6: 3/3 (MORE WELLS=GREATER IMPACT)

PAGE 18

"...incremental contribution to these impacts is not considered significant except for impacts to the open channel habitat/stream bed with riparian element's habitat located in Kelvin Canyon."

THE BIOLOGICAL RESOURCES WHICH WILL BE IMPACTED FAR EXTEND BEYOND THE CHANNEL OF THE STREAM BED. DEEP ROOTED TREES LOCATED BELOW THE STREAM DOWN TO THE OCEAN DEPEND ON THE WATER SOURCE.

PEPPER TREES AND OTHER DEEP ROOTED TREES ARE NOW IN DISTRESS DUE TO THE LOSS OF GROUND WATER.

A BIOLOGICAL EXPERT SHOULD BE EMPLOYED TO MONITOR THE AMOUNT OF GROUND WATER REMOVED FROM THE ENTIRE ABALONE COVE ABATEMENT DISTRICT AND THE DEWATERING IMPACTS ON THE ENVIRONMENT. THE RDA AND ACLAD BOTH OPERATE DEWATERING WELLS. THE CUMULATIVE IMPACT FROM THE REMOVAL OF GROUND WATER CAUSES AN AVOIDABLE ADVERSE IMPACT ON BIOLOGICAL RESOURCES. THE CUMULATIVE IMPACT FROM THE LOSS OF GROUND WATER NEEDS TO BE EVALUATED IN THE EIR.

ALTERNATIVE 1 WILL ELIMINATE THE IMPACT.

Page 19, Earth Resources Alternative 1 No Project

WILL ELIMINATE THE IMPACT.

Page 20, Water Resources Alternative 1 No Project

WILL ELIMINATE THE IMPACT.

Alternative 6

WILL HAVE A GREATER IMPACT THAN THE PROPOSED PROJECT.

Page 21 "The No Project/No Development Alternative would result in continued geology/landslide instability."

THE LANDSLIDE STOPPED MANY YEARS AGO. THIS PROJECT IS FAR FROM THE 80 ACRE INACTIVE ABALONE COVE LANDSLIDE AREA. WHAT IS THE DIFFERENCE FROM REMOVING GROUND WATER LOCATED IN A HIGH FIRE HAZARD UNDEVELOPED AREA VERSUS FROM AN ACCESSIBLE AREA CLOSER TO THE SLIDE? ANSWER: THE ONLY DIFFERENCES ARE SAVING THE ENVIRONMENT AND DEWATERING THE PORTUGUESE BEND SLIDE.

"The Solar Alternative would increase...impact area."

USING SOLAR WOULD NOT INCREASE THE IMPACT AREA WHEN COMPARED TO AREA NEEDED TO INSTALL AND MAINTAIN POWER POLES.

Page 22 Altamira Canyon Pipe

WOULD ELIMINATE ALL RECHARGING GROUND WATER DIVERTED INTO ALTAMIRA CANYON FROM ISLAND VIEW, DEL CERRO AND VALLEY VIEW AREAS.

Page 26 Alternative 2

THE DRAFT EIR FAILS TO IDENTIFY AN ALTERNATIVE SITE FOR A WELL WHICH WOULD BE ENVIRONMENTALLY SUPERIOR TO THE PROJECT SITE AND OTHER WELL LOCATIONS. DEVELOPING A WELL IN A RESIDENTIAL AREA NEAR A POWER POLE DOWN SLOPE FROM THE KELVIN CANYON SPRING WOULD BE THE SAFEST LOCATION FOR ALL CONCERNED. WELLS ON THE UNDEVELOPED HILLSIDE CAN BECOME OPERATIONAL AT A LATER DATE WHEN DEVELOPMENT TAKES PLACE.

Exhibit 22 Revised

THIS EXHIBIT IS INCOMPLETE. THERE IS A DIRT ROAD AND A TRAIL WHICH WOULD PROVIDE A ROUTE FOR THE DISCHARGE PIPE FROM THE HON WELL

AND ALTERNATIVE SITE 2 TO NARCISSA/VANDERLIP. THIS ROUTE WOULD ALLOW THE DISCHARGE PIPE TO REMAIN ON STABLE LAND. ROUTING THE DISCHARGE PIPE ON STABLE LAND IS ENVIRONMENTALLY SUPERIOR.

THE PROPOSED ROUTE FOR THE PIPE SHOWN IN THE EXHIBIT TO THE WATER TANK ROUTES THE WATER OVER A HILL WHICH FAILED AND CAUSED DRAIN WATER TO ENTER THE ACTIVE PORTUGUESE BEND SLIDE.

ALSO, THE DISCHARGE LINE FROM THE PROPOSED PROJECT CAN BE UNDERGROUND (4-5 INCHES) OR COVERED AT THE PROPOSED ROUTE ABOVE GROUND. RUNNING THE PIPE BELOW GROUND IN KELVIN CANYON STREAM BED IS PROPOSED BUT HAS NOT BEEN ENVIRONMENTALLY EVALUATED AND WOULD RESULT IN A MAJOR IMPACT TO THE ENVIRONMENT.

THIS EXHIBIT IS INCOMPLETE BECAUSE IT DOES NOT SHOW PROPOSED PVC PIPE FOR ALTERNATIVE SITE 2.

Page 28 Hon Well Site

THE DISCHARGE PIPE USED FOR DEWATERING KELVIN CANYON SPRING SHOULD BE ROUTED DOWN THE FIRE ROAD RUNNING ON THE EAST SIDE OF THE CANYON TO THE NARCISSA/VANDERLIP DISCHARGE LINE WHICH IS LOCATED ON STABLE LAND. (SAME AS ALTERNATIVE SITE 2).

PROVIDING THE DISCHARGE PIPE IS INSTALLED "3,500 FEET TO THE SOUTH" (REALLY EAST), THE DISCHARGE LINE IS PROPOSED TO BE PLACED IN AN ACTIVE LANDSLIDE AREA OF THE PORTUGUESE BEND SLIDE. THE PIPE IS PROPOSED TO RUN FROM THE HON WELL SITE THROUGH AN AREA WHICH SUFFERED A MAJOR LAND FAILURE ON JANUARY 5, 1995. THE COLLAPSING CLIFF CAUSED THE EXISTING DISCHARGE LINE TO BREAK. THE WELL WATER FROM THE PIPE ENTERED DEPRESSIONS IN THE EARTH. THE WELLS CONNECTED TO THE BROKEN PIPE HAD TO BE TURNED OFF UNTIL THE LINE COULD BE REPAIRED AND RELOCATED.

THE EXISTING DEWATERING PIPE IS SAID TO DISCHARGE WELL WATER INTO HALF ROUNDS APPROXIMATELY 300 YARDS ABOVE PALOS VERDES DRIVE SOUTH. THE HALF ROUNDS LEAK INTO THE ACTIVE PORTUGUESE BEND SLIDE. **ADDITIONAL WELL WATER WILL THREATEN THE STABILITY OF PALOS VERDES DRIVE SOUTH**, THE ONLY THOROUGHFARE ON THE SOUTH SIDE OF THE PENINSULA.

LOIS LARUE WORKED FROM 1988 UNTIL 1995 BEFORE SHE CONVINCED THE RDA TO TAKE THE WELL WATER OUT OF THE HALF ROUNDS. THIS SLIDE AREA, IN PLACES, IS SAID TO BE MOVING UP TO ONE INCH PER DAY.

THIS DRAFT RREIR IS INCOMPLETE BECAUSE THE ENVIRONMENTAL RISK OF PIPING WELL WATER INTO AN EXISTING PIPE WHICH IS SAID TO DISCHARGE INTO A HALF-ROUND DRAIN THAT LEAKS INTO THE VERY ACTIVE PORTUGUESE BEND LANDSLIDE HAS NOT BEEN EVALUATED.

THE HON WELL, IF FUNDED BY THE HORAN LIEN MONIES, SHOULD BE ROUTED LIKE ALTERNATIVE SITE 2 WELL IS TO NARCISSA/VANDERLIP EXISTING OUTLET. ROUTING THE PIPE THIS WAY WILL ALSO ALLOW FOR FUTURE DEWATERING WELLS IN ACLAD/HORAN/ABALONE COVE LANDSLIDE AREA.

THE PROPOSED PIPE SHOULD BE LARGE ENOUGH TO ALLOW FOR ADDITIONAL WELLS TO BE CONNECTED AT A LATER DATE.

Page 29, 2. Aesthetics

SITE 2 IS LOCATED ON THE EAST SIDE OF KELVIN CANYON. REMOVING GROUND WATER WOULD IMPACT THE ENTIRE CANYON AND THE ENTIRE AREA REACHING TO THE BEACH.

4. Public Services- Fire Protection

SITE 2 AND THE HON WELL ALTERNATIVES ARE MORE ACCESSIBLE FOR FIREFIGHTERS IN THE EVENT THE POWER LINES SPARK A FIRE.

POWER LINES WILL NOT HAVE TO CROSS OVER THE DEEP KELVIN CANYON.

THE EDISON COMPANY WILL HAVE BETTER ACCESS TO READ THE METER AT THE HON AND SITE 2 LOCATIONS.

C. Status of Alternative

ASPECTS OF THE HON WELL SITE ARE ENVIRONMENTALLY LESS DESTRUCTIVE TO THE PROPOSED PROJECT; HOWEVER, THE DISCHARGE LINE MUST TRAVEL IN A CLOSED PIPE ON STABLE LAND ALL OF THE WAY TO THE OCEAN. THE DISCHARGE LINE SHOULD NOT BE PLACED UNDERGROUND IN A STREAM BED!

Page 30-31 Power Source

THE CITY OF RANCHO PALOS VERDES, FOR HEALTH AND SAFETY REASONS, REQUIRE THAT ALL POWER LINES BE PLACED UNDERGROUND. THIS EIR HAS FAILED TO EVALUATE THE IMPACT FROM UNDER GROUNDING FROM DEL CERRO PARK DOWN A STEEP MOUNTAIN FACE.

IT SHOULD BE NOTED THAT, IN HIGH WIND AREAS LIKE THE PROJECT SITE, POWER LINES CAN ARC AND CAUSE A FIRE. AN ARCING POWER LINE CAUSED THE MALIBU FIRE A YEAR OR SO AGO.

Page 33, Alternative Access

CURRENTLY, THERE IS A STEEP, TREACHEROUS, NARROW HORSE TRAIL WHICH CROSSES KELVIN CANYON RUNNING FROM EAST TO WEST. IT IS IMPOSSIBLE FOR VEHICULAR ACCESS OVER THIS NARROW TRAIL. THIS ALTERNATIVE ACCESS IS NOT TECHNICALLY FEASIBLE.

THIS ALTERNATIVE ACCESS IS THE LOCATION OF A KNOWN INDIAN MIDDEN.

Page 36, Altamira Canyon Pipe

THE ALTAMIRA CANYON ALTERNATIVE WOULD STOP THE WATER RUNOFF FROM ENTERING THE HEADLANDS OF THE CANYON. VALLEY VIEW, DEL CERRO AND ISLAND VIEW RESIDENTIAL DRAINS ARE ALREADY IN PLACE. AN ABOVE GROUND AND ABOVE CANYON PIPE RUNNING FROM THE TOP OF ALTAMIRA CANYON TO THE OCEAN WOULD BE REQUIRED TO STOP RESIDENTIAL WATER FROM ENTERING THE CANYON AT THE SOURCE, "BOULDER DAM." THIS WATER DRAINS DAILY FROM HUNDREDS OF HOMES. THE WATER DRAINAGE IS NOT LIMITED TO STORM WATER. THE WATER COULD EVEN BE PLACED IN THE SEWER SYSTEM OR ROUTED WEST DOWN CREST TO HAWTHORNE BLVD., AWAY FROM AN ANCIENT LANDSLIDE AREA.

THE ENVIRONMENTAL ASSESSMENT DOES NOT PROPERLY EVALUATE THE IMPACT OF STOPPING ALL WATER GENERATED FROM ISLAND VIEW, DEL CERRO AND VALLEY VIEW FROM ENTERING THE HEADLANDS OF ALTAMIRA CANYON.

Page 48 Power lines and poles

"Each power pole will impact an approximately four (4) square feet area."

TO INSTALL FOUR POWER POLES IN A VERY STEEP CANYON WILL CAUSE THE DESTRUCTION OF HUNDREDS OF SQUARE FEET, NOT 4 SQUARE FEET PER POLE!

Appendix A, Reviewing Agencies

THE FOLLOWING AGENCIES SHOULD HAVE REVIEWED THE EIR AND WERE NOT NOTED AS A REVIEWING AGENCY: RECLAMATION AND NATIVE AMERICAN HERITAGE COMMISSION.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
Carlsbad Field Office
2730 Loker Avenue West
Carlsbad, California 92008

May 15, 1997

Mr. Dean E. Allison
Department of Public Works
City of Rancho Palos Verdes
30940 Hawthorne Boulevard
Rancho Palos Verdes, California 90275

Subject: Abalone Cove Well Conversion Project, City of Rancho Palos Verdes, California

Dear Mr. Allison:

This letter responds to the proposed Abalone Cove Well Conversion project in the City of Rancho Palos Verdes, California. The U.S. Fish and Wildlife Service (Service) is concerned about the possible effects of the project on wetlands, the endangered Palos Verdes blue butterfly (*Glaucopsyche lygdamus palosverdesensis*) (butterfly), the endangered Pacific pocket mouse (*Perognathus longimembris pacificus*) (mouse), the threatened California gnatcatcher (*Poliophtila californica californica*) (gnatcatcher), animal and plant species of special concern, and fish and wildlife resources. The butterfly, mouse, and gnatcatcher are protected under the Endangered Species Act of 1973, as amended (Act).

Our comments are based on the *Abalone Cove Well Conversion Project Draft Environmental Impact Report* dated August 12, 1996, which was received by the Service on May 7, 1997; *Abalone Cove Well Conversion Project Draft Revised and Recirculated Draft Environmental Impact Report (DRDEIR)* dated April 1, 1997; a memorandum from Perry Ehlig to Les Evans, Director of Public Works for the City of Rancho Palos Verdes, dated June 25, 1996, (Ehlig Memo); *California Gnatcatchers, Cactus Wrens, and Conservation of Coastal Sage Scrub on the Palos Verdes Peninsula* progress report No. 4 (1996), by Jonathan Atwood, Sophia Tsai, and Amy Miller of the Manomet Observatory; and other information in the Service's files.

Project Description

The proposed project site is located in the Kelvin Canyon area in the City of Rancho Palos Verdes, Los Angeles County, California. We understand that the project consists of 1) conversion of an existing monitoring well to a dewatering well, and 2) operation of the dewatering well. Kelvin Canyon is designated as a blue line stream. This area currently supports a mosaic of ruderal, coastal sage, riparian, cactus scrub, grassland and other habitats. These communities provide valuable habitat for migratory and resident birds, mammals, and other animals and plants. The site also likely provides habitat for animal and plant species that are listed under the Act. In addition, there is a spring in Kelvin Canyon.

Project Impacts and Mitigation

Wetland and General Wildlife Resources

Mr. Allison

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The proposed project may result in significant adverse indirect and cumulative impacts to native wildlife and their habitats in the Abalone Cove Landslide and Portuguese Landslide areas in Rancho Palos Verdes. The DEIR and DRDEIR do not fully address the extent of the possible adverse impacts resulting from this proposed project on wildlife, their habitats, and wetlands.

Our specific comments and recommendations on the proposed dewatering project and its potential impacts to wildlife and wetlands are as follows:

- 1) Biological impacts resulting from a project should be considered significant if they will:
a) adversely affect a rare or endangered species of plant or animal or their habitats; b) interfere substantially with the movement of any resident or migratory fish or wildlife species; and/or c) substantially diminish habitat for native fish, wildlife, or plants. Given these criteria, and the on-going loss and damage to natural habitats in Rancho Palos Verdes and the Palos Verdes peninsula, the direct, indirect, and cumulative impacts to wildlife resulting from the proposed project as defined in the California Environmental Quality Act Guidelines (CEQA) (§ 15382), are likely significant.

Because the Abalone Cove Well Conversion Project will likely have a significant effect on the environment, we recommend that the final environmental document adequately address the direct, indirect, and cumulative impacts to wildlife resources and wetlands, and proposed mitigations resulting from the proposed project, and the other interrelated and interdependent projects which include the Rancho Palos Verdes Shore Protection Feasibility Study, and the Altamira Canyon Drainage Control Project.

- 2) The Service is concerned about the potential adverse impacts of the proposed project on the spring in Kelvin Canyon (Ehlig Memo, and page 62 of the DEIR). The spring and associated wetland habitats provide important drinking water, foraging, breeding, and resting habitat for native birds, mammals, reptiles, insects, and amphibians. The spring and associated wetland habitats also provide habitat diversity and add to the value of the surrounding uplands. The Service disagrees with the statements in the DEIR (page 66) that the implementation of the proposed project will not have an adverse impact on sensitive plant or animal species. The Service agrees with the statement in the DEIR (page 67) which states that the operation of the dewatering well will be a significant adverse impact on biological resources as a result of the effects on the spring and surface waters of Kelvin Canyon. In addition, the Ehlig Memo states "...there is a strong possibility that the spring in Kelvin Canyon will dry up. Do they want to mitigate the landslides or maintain the spring? If the spring is more important than mitigating the landslides, we should forget our efforts to mitigate the landslides." The elimination or reduction in outflow of water from the spring in Kelvin Canyon likely will have significant impacts on native animals and plants.

The Service is especially concerned about the "significant unavoidable impact" on biological resources caused by the loss of this blue line stream and the spring in Kelvin Canyon given the participation by the City of Rancho Palos Verdes in the Natural Communities Conservation Program (NCCP). The adverse impacts on native wildlife and native vegetation caused by the loss of this blue line stream and associated surface waters may alter or compromise potential reserve designs for the City's NCCP. We

Mr. Allison

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recommend that the City develop a plan that adequately mitigates the loss of the spring in Kelvin Canyon prior to certification of the final environmental documents.

- 3) In addition, the Service is concerned about the potential adverse impacts resulting from the access roads. The adverse effects likely will include increased amounts of erosion and runoff, increased numbers of domestic dogs and cats that will chase and prey upon native wildlife, increased fragmentation of native habitats, and increased incidences of wildfire caused by vehicle-induced fires. We recommend that the City develop a plan that adequately mitigates for the adverse impacts resulting from the access road prior to certification of the final environmental documents.

Sensitive Species

The proposed Abalone Cove Well Conversion Project area contains individuals of the threatened California gnatcatcher, and may contain the endangered Pacific pocket mouse, and endangered Palos Verdes blue butterfly and its foodplants. Section 9 of the Act prohibits the "take" of any federally listed endangered species by any person subject to the jurisdiction of the United States. Take is defined in 50 C.F.R. § 17.3 through the definition of harass and harm as follows: Harass in the definition of "take" means "an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding or sheltering." Harm in the definition of "take" in the Act means an act which actually kills or injures wildlife. "Such an act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering."

Take incidental to an otherwise lawful activity may be authorized under sections 7, 10(a), or exempted under section 4(d) of the Act. If a Federal agency is involved with the permitting, funding, or carrying out of the project, then initiation of formal consultation between that agency and the Service pursuant to section 7 of the Act is required if it is determined that the proposed project may affect a federally listed species. Such consultation would result in a biological opinion that addresses the anticipated effects of the project to the listed species and may authorize a limited level of incidental take. If a Federal agency is not involved with the project, and federally listed species may be taken as part of the project, then an incidental take permit pursuant to section 10(a) of the Act would need to be obtained. The Service may issue such a permit upon completion of a satisfactory habitat conservation plan for the listed species that would be affected by the project. Under the special 4(d) rule, take of California gnatcatchers during the plan preparation phase is authorized by local jurisdictions through habitat loss permits. The Conservation Guidelines limit interim habitat loss to no more than 5 percent of existing coastal sage scrub habitat. Incidental take of the California gnatcatcher as a result of land-use activities addressed in an approved NCCP plan would not be considered a violation of section 9 of the Act, provided the Service determines that the plan meets the issuance criteria for a "take" permit pursuant to section 10(a)(1)(B) of the Act and 50 CFR § 17.32(b)(2).

The proposed Altamira Canyon Drainage Control Project may result in take of the California gnatcatcher, and possibly the Pacific pocket mouse and the endangered Palos Verdes blue butterfly. The Service recommends that adequate surveys for these three species be conducted. Mitigations that may be necessary for these listed species may require substantial changes in project design. Our comments on the potential adverse impacts and proposed mitigation for this federally listed species are as follows:

Mr. Allison

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- 1) According to the DEIR, the surveys for the endangered Palos Verdes blue butterfly and its foodplants (*Astragalus trichopodus* var. *lonchus* and *Lotus scoparius*) were conducted in 1991-1993. This federally listed animal inhabits the Defense Fuel Support Point in San Pedro and historic populations are known from the project area. Although the locoweed and associated habitats may not have been occupied at the time of the various surveys, given the proximity of these patches to known habitat and the mobility of the butterfly, it is likely that through time the animal likely inhabit the project site, even though no individuals were observed during the prior survey work. Therefore, we recommend that an adequate survey for the endangered Palos Verdes blue butterfly be completed in the project area by a permitted entomologist and the results submitted to the Service for review and concurrence.
- 2) According to the DEIR, small mammal surveys were conducted in the City of Rancho Palos Verdes during a limited number of trap nights in 1989, 1993, and 1994. The endangered Pacific pocket mouse is historically recorded from the El Segundo area. No individuals were detected during the limited survey efforts. However, given the presence of suitable habitat and the cryptic habits of the animal, it is possible that this federally listed species inhabits the project site. Therefore, we recommend that an adequate survey for the endangered Pacific pocket mouse be completed in the project area by a permitted mammalogist.
- 3) The proposed project likely will result in the take of at least one pair of California gnatcatchers. This issue should be resolved with the Service prior to certification of the final environmental documents. Limited incidental take of the California gnatcatchers within subregions actively engaged in the preparation of a NCCP plan would not be considered a violation of Section 9 of the Act under the rule, provided that such take resulted from activities conducted consistent with the NCCP Conservation and Process Guidelines. Take of coastal sage scrub during the plan preparation phase is authorized by local jurisdictions through habitat loss permits. The Conservation Guidelines limit interim habitat loss to no more than 5 percent of existing coastal sage scrub habitat.
- 4) The Service is concerned that the proposed Abalone Cove Well Conversion Project may result in indirect and cumulative impacts that may effect adequate reserve design for the City's NCCP. This issue should be resolved with the Service prior to certification of the final environmental documents.

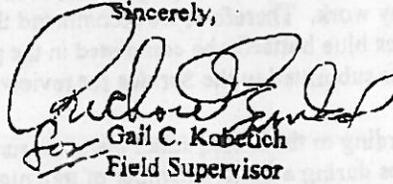
Conclusions and Recommendations

Adoption of the project, as proposed in the DEIR, or any of the other five alternatives likely will require authorization from the Service for incidental take of the threatened California gnatcatcher, and possibly the endangered Pacific pocket mouse and the Palos Verdes blue butterfly under sections 7 or 10(a), or possibly 4(d) to avoid potential violations of section 9 of the Act. The Service is especially concerned about the potential loss of the spring in Kelvin Canyon. The elimination or reduction in outflow of this source of surface water likely may have significant and far reaching adverse impacts on native wildlife. Therefore, the Service recommends that the City of Rancho Palos Verdes adequately address the above concerns prior to certification or select the no project alternative for the Abalons Cove Well Conversion Project.

Mr. Allison

We appreciate the opportunity to review the DEIR and DRDEIR for potential impacts on endangered species, wildlife, and wetlands. We are available to work with the City of Rancho Palos Verdes in the development of an acceptable project. Please contact Chris Nagano or Mary Beth Woulfe of this office at the letterhead address or at (760) 431-9440 if you have any questions.

Sincerely,


Gail C. Kobelich
Field Supervisor

1-6-97-IA-115

- cc: CDFG, Long Beach Sacramento, CA (Attn: P. Wolf)
- CDFG, San Diego, CA (Attn: B. Tippets/M. Muchinske)
- CDFG, Sacramento, CA (Attn: D. Warenaicia)



PETE WILSON
GOVERNOR

State of California

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET
SACRAMENTO 95814



LEE GRISSOM
DIRECTOR

May 19, 1997

RECEIVED

City of Rancho Palos Verdes

MAY 21 1997

DEAN ALLISON
CITY OF RANCHO PALOS VERDES
30940 HAWTHORNE BLVD.
RANCHO PALOS VERDES, CA 90275-5391

PUBLIC WORKS DEPARTMENT

Subject: ABALONE COVE WELL CONVERSION PROJECT SCH #: 96081039

Dear DEAN ALLISON:

The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period is closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call at (916) 445-0613 if you have any questions regarding the environmental review process. When contacting the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

Mr. Tolson	
Mr. DeLoach	
Mr. Mohr	
Mr. Bishop	
Mr. Casper	
Mr. Callahan	
Mr. Conrad	
Mr. Felt	
Mr. Gale	
Mr. Rosen	
Mr. Sullivan	
Mr. Tavel	
Mr. Trotter	
Tele. Room	
Miss Holmes	
Miss Gandy	

96081039

96081039

SCH # 96081039

1. Project Title: Abalone Cove Well Conversion Project
 2. Lead Agency: City of Rancho Palos Verdes, Contact Person: Dean Allison
 3. Street Address: 10940 Hawthorne Blvd., City: Rancho Palos Verdes
 4. County: Los Angeles, Zip: 90275-5391, Phone: 310-581-6500
 5. Assessment's Parcel No., Section, City/Community: Rancho Palos Verdes
 6. Cross Streets: See Attached

7. VARIATION FROM: a. State b. All- c. Rail- d. Water-
 8. LOCAL ACTION TYPE: 01. General Plan Update, 02. New Elements, 03. General Plan Amendment, 04. Master Plan, 05. Amendment, 06. Specific Plan, 07. Community Plan, 08. Redevelopment, 09. Other
 9. DEVELOPMENT TYPE: 01. Residential: Single-Family, 02. Office: Sq. Ft., 03. Shopping/Commercial: Sq. Ft., 04. Industrial: Sq. Ft., 05. Other Facilities: Other, 06. Transportation: Type, 07. Airports: Planned, 08. Power: Type, 09. Other: Type, 10. Other

10. STATE AGENCIES LIMITED: 11. STATE AGENCIES OTHER: None
 12. PUBLIC WORKS PROJECTS IN PROGRESS: 13. PUBLIC WORKS PROJECTS OTHER: None
 14. PUBLIC WORKS PROJECTS OTHER: Public works project areas surrounding the proposed project are currently undeveloped.
 15. PROJECT DESCRIPTION: The implementation of improvements to lower the groundwater level in the Abalone Cove Landslide area. The project consists of two (2) components. The first component is the conversion of an existing monitoring well to a dewatering well. The second component is the operation of the dewatering well.

State Clearinghouse Contact: Mr. Chris Belsky (916) 445-0613

Project Sent to the following State Agencies

State Review Began: 4-1-97
 Dept. Review to Agency: 5-9
 Agency Rev to SCH: 5-14
 SCH COMPLIANCE: 5-16

- Resources
- Boating
- Coastal Comm
- Coastal Consv
- Colorado Rvr Bd
- Conservation
- Fish & Game #5
- Delta Protection
- Forestry
- Parks & Rec OHP
- Reclamation
- BCDC
- DWR
- OES
- Bus Transp Hous
- Aeronautics
- CHP
- Caltrans #7
- Trans Planning
- Housing & Devel
- Health & Welfare
- Drinking H2O
- Medical Waste
- State/Consumer Svcs
- General Services
- Cal/EPA
- ARB
- CA Waste Mgmt Bd
- SWRCB: Grants
- SWRCB: Delta
- SWRCB: Wtr Quality
- SWRCB: Wtr Rights
- Reg. WQCB #4
- DTSC/CTC
- Yth/Adlt Corrections
- Corrections
- Independent Comm
- Energy Comm
- NAHC
- PUC
- Santa Mn Mtns
- State Lands Comm
- Tahoe Rgl Plan
- Other:

Please note SCH Number on all Comments
96081039
 Please forward late comments directly to the Lead Agency

AQMD/APCD (Resources: 45)
96081039

APPENDIX A
COMMENT LETTERS

VISTA

COMMUNITY PLANNING DEVELOPMENT PROCESSING ENVIRONMENTAL IMPACT ANALYSIS RESOURCE AND PROJECT MANAGEMENT

August 12, 1995

Mr. Dean Allison
Department of Public Works
City of Rancho Palos Verdes
30940 Hawthorne Boulevard
Rancho Palos Verdes, California 90275-5391

**SUBJECT: ABALONE COVE WELL CONVERSION PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT**

Dear Dean:

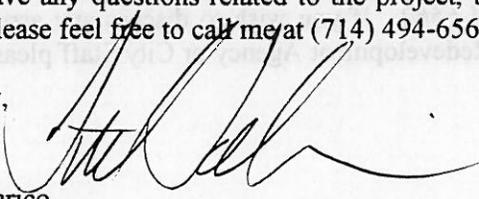
Enclosed please find twenty-two (22) copies of the Abalone Cove Well Conversion Project Draft Environmental Impact Report (EIR). Vista, on behalf of the City of Rancho Palos Verdes Redevelopment Agency, filed the EIR and Notice of Completion (NOC) with the County of Los Angeles and State of California on August 12, 1996, by mail. We requested a public review period for the Draft EIR beginning on August 12, 1996 and ending on September 30, 1996.

Vista transmitted the following information:

1. Letter to State Clearinghouse and County of Los Angeles
2. Clearinghouse Transmittal Form
3. Suggested Reviewing Agencies
4. Mailing List (Pages 1-7, August 12, 1996)
5. Notice of Completion (10 copies)
6. Abalone Cove Well Conversion Project EIR (10 copies)

If you have any questions related to the project, the review period, or the return of the proof of receipt please feel free to call me at (714) 494-6562.

Sincerely,


Fred Talarico
Principal Planner

Encl.: Letter to State Clearinghouse and County of Los Angeles
Clearinghouse Transmittal Form
Suggested Reviewing Agencies
Mailing List (Pages 1-7, August 12, 1996)
Notice of Completion (10 copies)
Abalone Cove Well Conversion Project EIR (10 copies)

CC: Mr. Dean Allison

1278 GLENNEYRE STREET SUITE 110
LAGUNA BEACH CALIFORNIA 92651
714 494 6562

VISTA

COMMUNITY PLANNING DEVELOPMENT PROCESSING ENVIRONMENTAL IMPACT ANALYSIS RESOURCE AND PROJECT MANAGEMENT

August 12, 1995

Mr. Mark Goss
State Office of Planning and Research
1400 Tenth Street Room 121
Sacramento, California

**SUBJECT: ABALONE COVE WELL CONVERSION PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT**

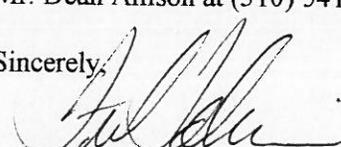
Dear Mr. Goss:

Enclosed please find ten (10) copies of the Abalone Cove Well Conversion Project Draft Environmental Impact Report (EIR) and Notice of Completion (NOC). The EIR and NOC were prepared in conjunction with the City of Rancho Palos Verdes. VISTA requests that you please respond with proof of receipt to confirm that the State has in fact received the ten (10) copies of the Draft EIR. VISTA would appreciate an immediate response upon receiving the documents. The proof of receipt can be returned to the address listed below:

VISTA
1278 Glenneyre Street, Suite 110
Laguna Beach, California 92651
Attn.: Mr. Fred Talarico

On behalf of the City of Rancho Palos Verdes Redevelopment Agency, we would also request a public review period for the Draft EIR beginning on August 12, 1996 and ending on September 30, 1996. Thank you for your time and cooperation. I look forward to receiving your response. If you have any questions related to the project, the review period, or the return of the proof of receipt please feel free to call me at (714) 494-6562. If you wish to discuss any aspect of the project with the City of Rancho Palos Verdes Redevelopment Agency or City Staff please contact Mr. Dean Allison at (310) 541-6500.

Sincerely,


Fred Talarico
Principal Planner

Encl.: Clearinghouse Transmittal Form
Suggested Reviewing Agencies
Mailing List (Pages 1-7, August 12, 1996)
Notice of Completion (10 copies)
Abalone Cove Well Conversion Project EIR (10 copies)

CC: Mr. Dean Allison

1278 GLENNEYRE STREET SUITE 110
LAGUNA BEACH CALIFORNIA 92651
714 494 6562

96081039

1. Project Title: Abalone Cove Well Conversion Project
 2. Lead Agency: City of Rancho Palos Verdes Contact Person: Dean Allison
 3a. Street Address: 20930 Hawthorne Blvd. 3b. City: Rancho Palos Verdes
 3c. County: Los Angeles 3d. Zip: 90275-5341 3e. Phone: 310-541-4500
 PROJECT LOCATION 4. County: Los Angeles 4a. City/Community: Rancho Palos Verdes
 4b. Assessor's Parcel No. _____ 4c. Section _____ Twp. _____ Range _____
 4d. Section _____
 5a. Cross Streets: _____ 5b. Community: _____
 5c. For Rural, Nearest _____
 5d. Community: _____

6. Within 2 miles: a. State Bay # _____ No _____ Air-ports No _____ Rail-ways No _____ d. Water-ways No _____

7. GENERAL PLAN 8. LOCAL ACTION PLAN 9. DEVELOPMENT PLAN

01. NOA 01. General Plan Update 01. Residential: Units _____ Acres _____
 02. NOA 02. New Element 02. Office: Sq. Ft. _____
 03. NOA 03. General Plan Amendment Acres _____ Employees _____
 04. NOA 04. Master Plan 03. Shopping/Commercial: Sq. Ft. _____
 05. NOA 05. Annexation Acres _____ Employees _____
 06. NOA 06. Specific Plan 04. Industrial: Sq. Ft. _____
 07. NOA 07. Community Plan Acres _____ Employees _____
 08. NOA 08. Redevelopment 05. Water Facilities: MGD _____
 09. NOA 09. Massacre 06. Transportation: Type _____
 10. NOA 10. Land Division (Subdivision, Parcel Map, Tract Map, etc.) 07. Mining: Mineral _____
 11. NOA 11. Use Permit 08. Power: Type _____
 12. NOA 12. Water Right Plan 09. Waste Treatment: Type _____
 13. NOA 13. Cancel Ag Preserve 10. CCS Related _____
 14. NOA 14. Other 11. Other Conversion of a monitoring well to dewatering well system.

10. NOA State Action: Limited 11. NOA Local Action: None

12. NOA Public Works Project Area Public Works Project Area Public Works Project Area Public Works Project Area

01. NOA Aesthetic/Visual 08. NOA Flooding/Drainage 15. NOA Septic Systems 23. NOA Water Quality
 02. NOA Agricultural Land 09. NOA Geologic/Seismic 16. NOA Sewer Capacity 24. NOA Water Supply
 03. NOA Air Quality 10. NOA Jobs/Housing Balance 17. NOA Soil 25. NOA Wetland/Riparian
 04. NOA Archaeological/Historical 11. NOA Minerals 18. NOA Soil Erosion 26. NOA Wildlife
 05. NOA Coastal Zone 12. NOA Noise 19. NOA Solid Waste 27. NOA Growth Inducing
 06. NOA Economic 13. NOA Public Services 20. NOA Toxic/Hazardous 28. NOA Incompatible Landuse
 07. NOA Fire Hazard 14. NOA Schools 21. NOA Traffic/Circulation 29. NOA Cumulative Effects
 30. NOA Other

13. NOA Federal \$ None N/A State \$ None N/A Total \$ None N/A

14. NOA Public Works Project Area Public Works Project Area Public Works Project Area Public Works Project Area

15. NOA Public Works Project Area Public Works Project Area Public Works Project Area Public Works Project Area

The implementation of improvements to lower the groundwater level in the Abalone Cove Landslide area. The project consists of two (2) components. The first component is the conversion of an existing monitoring well to a dewatering well. The second component is the operation of the dewatering well.

State Clearinghouse Contact: Mr. Chris Belsky (916) 445-0613

Project Sent to the following State Agencies

State Review Began: 8.13.96
 Dept Review to Agency: 9.20
 Agency Rev to SCH: 9.25
 SCH COMPLIANCE: 9.27

- Resources
- Boating
- Coastal Comm
- Coastal Conserv
- Colorado Rvr Bd
- Conservation
- Fish & Game # 5
- Delta Protection
- Forestry
- Parks & Rec/OHP
- Reclamation
- BCDC
- DWR
- OES
- Bus Transp Hous
- Aeronautics
- CHP
- Caltrans # 7
- Trans Planning
- Housing & Devel
- Health & Welfare
- Drinking H2O
- Medical Waste
- State/Consumer Svcs
- General Services
- CalVEPA
- ARB
- CA Waste Mgmt Bd
- SWRCB: Grants
- SWRCB: Delta
- SWRCB: Wtr Quality
- SWRCB: Wtr Rights
- Reg. WQCB # 4
- DTSC/CTC
- Yth/Adlt Corrections
- Corrections
- Independent Comm
- Energy Comm
- NAHC
- PUC
- Santa Mn Mms
- State Lands Comm
- Tahoe Rgl Plan
- Other

Please note SCH Number on all Comments
 96081039
 Please forward late comments directly to the Lead Agency
 AQMD-APCD 33 (Resources: 8.17.)

0810
 Deputy

Dean



COUNTY OF LOS ANGELES
REGISTRAR-RECORDER/COUNTY CLERK

P.O. BOX 592, LOS ANGELES, CALIFORNIA 90053-0592 / (310) 462-2060

CONNOR B. McCORMACK
REGISTRAR-RECORDER/COUNTY CLERK

Date 8-16-96

Rancho Palos Verdes
applicant/lead agency

30810 Hawthorne Blvd.
street address

Rancho Palos Verdes Ca 90275
city state zip

RECEIVED
City of Rancho Palos Verdes
AUG 20 1996

PUBLIC WORKS DEPARTMENT

Please resubmit enclosed document/s with necessary corrections for processing.

1. Please submit notice in appropriate formation, see attached for sample.
2. Original signatures are required on both notice and certificate of fee exemption.
3. A legible copy of notice/certificate of fee exemption is needed for processing.
4. Notice is incomplete, incomplete portions are in highlight for your convenience.
5. There is a \$25.00 fee required to process notice submitted.
6. We do not accept checks dated more than 90 days from date of issuance.
7. Please make check payable to the Los Angeles County Clerk.
8. There is a \$ _____ .00 fee required to process the NOD as submitted. However, if the project was found to be de minimus, submit original signed certificate of fee exemption with NOD and a check for \$25.00, disregarding amount mention above
9. Check is unsigned.
10. The bulk of your notice has been held up at our office due to a lack of postage. A prepaid postage envelope in the amount of \$ _____ must be provided within 30 days, if you would like for your notice to be returned.
11. Other _____

NOTE:

PLEASE INCLUDE THE FOLLOWING TO ENSURE PROMPT PROCESSING & RETURN

- A) original signatures on notices and certificate of fee exemptions.
- B) two copies of notice if applicant/agency would like to receive a stamped copy before the posting period ends.
- C) two return addressed envelopes; postage not required if less than one dollar

Conny B. McCormack
Registrar-Recorder/County Clerk

R 0180
Deputy

Dear



RANCHO PALOS VERDES

August 22, 1996

Ms. Conny McCormack
Registrar/ County Clerk
COUNTY OF LOS ANGELES
P.O. Box 592
Los Angeles, CA 90053-0592

SUBJECT: Notice of Completion Recordation

Dear Ms. McCormack:

Attached please find a check in the amount of \$25.00 for recordation of the Notice of Completion for Abalone Cove Well Conversion Project Draft Environmental Impact Report.

Please mail a receipt with the recorded copy. If you have any further questions, please do not hesitate to contact me at (310) 541-6500 x 245.

Sincerely yours,

Lauren Ramezani
Sr. Administrative Analyst

Encl.: Check
Notice of Completion

n:\pw\lr\wpmisc.\nocabcov.wpd

To: File

From: Dean E. Allison

Re: Abalone Cove Well Conversion Project - Electrical Service to proposed de-watering well

Date: October 1, 1996

This memorandum has been prepared in response to comments to a July 28, 1995 letter from Janis Garton, Customer Service Planner for Southern California Edison Company, to Joel Rojas, Senior Planner for the City of Rancho Palos Verdes

Analysis performed after July 28, 1995 by the City of Rancho Palos Verdes, Charles Abbott and Associates, and Southern California Edison Company determined that providing power to the site from Crenshaw would be feasible, and would have lower costs than providing power from Del Cerro Park, see attached memorandum from Charles Abbott Associates.

In addition, Mr. Scott Gobble, Southern California Edison, has indicated that, provided the City make the necessary financial arrangements, Southern California Edison Company would construct the power line to the site from Crenshaw Boulevard.

cc:

Scott Gobble, Southern California Edison Company
Janis Garton, Southern California Edison Company
Doug Dancs, Charles Abbott Associates
Fred Talarico - Vista

Attachments:

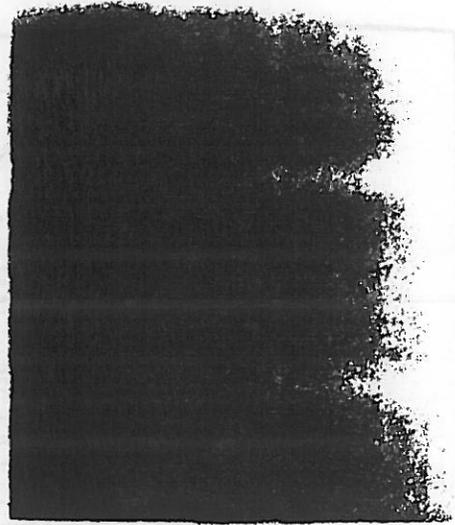
July 28, 1996 letter from Janis Garton to Joel Rojas
October 12, 1995 memorandum from Doug Dancs CAA to Dean Allison

FILE.WPD

5-25-96

Southern California Edison Company

P. O. BOX 2944
505 MAPLE AVENUE
TORRANCE, CALIFORNIA 90509



July 28, 1995

Mr. Joel H. Rojas, Senior Planner
City of Rancho Palos Verdes
Department of Planning, Building
& Code Enforcement
30940 Hawthorne Boulevard
Rancho Palos Verdes, CA. 90275-0360

**Subject: Abalone Cove
Well Conversion Project**

Southern California Edison (SCE) does not feel it would be feasible to install power poles as shown on Exhibit 8.

Our proposed method of service for the dewatering well would utilize an existing SCE handhole to install cable to a meter pedestal located at Del Cerro Park.

Sincerely,

JANIS GARTON
Customer Service Planner
(310) 783-9330

JG:cy



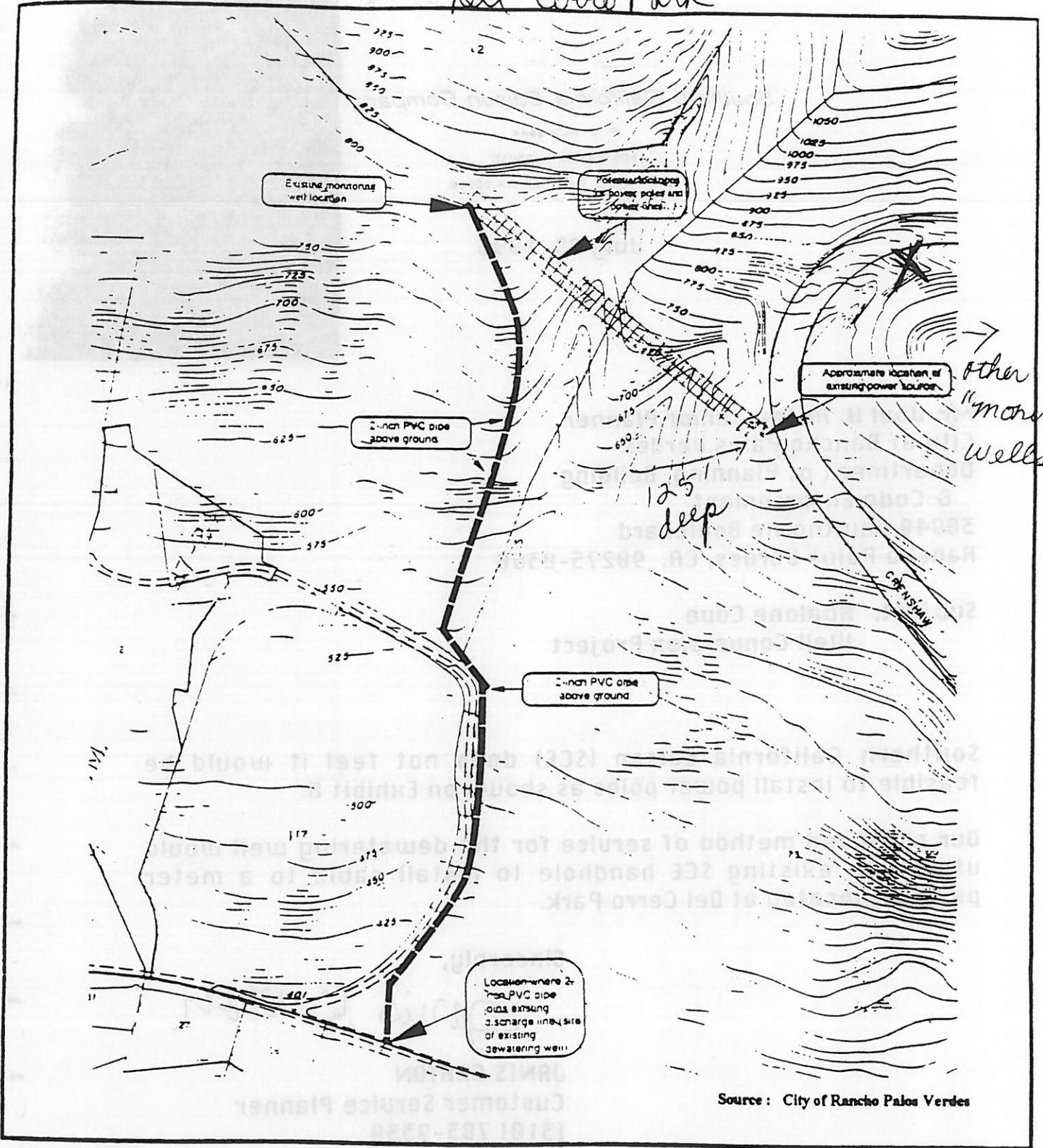
VISTA

EXHIBIT 8

LOCATION OF POWER POLES AND
OVERHEAD ELECTRICAL LINES

Abalone Cove Well Conversion Project
Environmental Impact Report
City of Rancho Palos Verdes

Del Cerro Park



Source: City of Rancho Palos Verdes

LOCATION OF POWER POLES AND OVERHEAD ELECTRICAL LINES

Abalone Cove Well Conversion Project
Environmental Impact Report
City of Rancho Palos Verdes

VISTA

no scale

EXHIBIT 8



CHARLES ABBOTT ASSOCIATES, INC.

TO: Dean Allison
FROM: Doug Dancs
DATE: October 12, 1995
SUBJECT: LC4 Well Conversion

Table with 4 columns: Options, 1, 2, 3 (CAA Recommends). Rows include Source of Power, Meter Panel Location, SCE Charges Reimbursable, Reimbursable Amounts, Charges to the City, and Discussion.

LET'S DISCUSS BRIEFLY
JUN 27 1996

MEMORANDUM

TO: Les Evans, Director of Public Works, RPV

DATE: June 25, 1996

FROM: Perry Ehlig ~~City~~ City Geologist

COPIES: Charles Abbott, Dean Allison, Paul Bussey, David McBride

SUBJECT: Recommendation to start pumping Leighton well W-2, located adjacent to Crenshaw Extension east of Kelvin Canyon, rather than well C-4, located on ridge west of Kelvin Canyon

I strongly recommend that Leighton well W-2 be placed into production as soon as possible and that efforts to get C-4 into production be discontinued for the time being.

Efforts to get well C-4 into production have been delayed a long time by what seem to be endless environmental concerns. The purpose of the well is to intercept ground water that flows downhill through the subsurface and from springs in Kelvin Canyon. This water replenishes ground water within the Abalone Cove and Portuguese Bend landslides and interferes with efforts to stabilize the slides.

Leighton installed two wells along Crenshaw Extension at the request of the Geotechnical Review Panel and me. According to the drillers, both wells have good production potential. The wells are near the center of a synclinal trough that conducts water westward from the crest of the Peninsula to where the water flows from the trough at a structural low near Kelvin Canyon. At present, we do not know how much of the water comes from the east (past the Leighton wells) and how much comes from the west (past well C-4). However, either well will remove water that will otherwise flow downhill at Kelvin Canyon and hence into the landslides.

The Leighton well that I would like to place into production is on the south side of Crenshaw Extension just uphill from the east-facing hairpin turn. It will be less expensive to get it into operation and has fewer environment concerns than well C-4. This well has the following advantages over C-4:

1. It is adjacent to a power pole where electricity can be obtained. Electricity will have to be brought at least 700 feet across rugged terrain to well C-4.
2. A dewatering line can be installed along existing roads to an existing dewatering line that serves wells in Abalone Cove or Portuguese Bend. A pipe from C-4 would have to be installed across unimproved terrain.
3. The well is readily accessible from an existing maintained road. C-4 is not.

In either case, there is a strong possibility that the spring in Kelvin Canyon will dry up. The City must come to grips with this possibility. Do they want to mitigate the landslides or maintain the spring? If the spring is more important than mitigating the landslides, we should forget our efforts to mitigate the landslides.

By the way, welcome to RPV. Please let me know if I can be of assistance to you. For example, I will gladly show you the wells or give you a tour of the landslide. If you need me, just give me a call at (213) 255-7873.

RECEIVED
City of Escondido
JUN 27 1996

MEMORANDUM

TO: Lee A. ... Director of Public Works, RPV

FROM: Perry ... City Geologist

COPIES: Charles Abbott, Dean Allison, Paul Barney, David McBride

SUBJECT: Recommendation to start pumping Leighton well W-1, located adjacent to ...

I strongly recommend that Leighton well W-1 be placed into production as soon as possible and that efforts to get C-4 into production be discontinued for the time being.

Efforts to get well C-4 into production have been delayed a long time by well seem to be entirely unworkable. The purpose of the well is to intercept ground water that flows downhill through the subsurface and from springs in Kelvin Canyon. This water replenishes ground water within the Abalone Cove and Portuguese Bend landfills and therefore with efforts to stabilize the slides.

Leighton installed two wells along Grenshaw Extension at the request of the ... (technical details about well placement and water flow) ...

The Leighton well that I would like to place into production is on the south side of Grenshaw Extension just uphill from the east-facing basin turn. It will be less expensive to get it into operation and has fewer environmental concerns than well C-4. This well has the following advantages over C-4:

- 1. It is adjacent to a power pole where electricity can be obtained. Electricity will have to be brought at least 700 feet across rugged terrain to well C-4.
- 2. A dewatering line can be installed along existing roads to an existing dewatering line that serves wells in Abalone Cove or Portuguese Bend. A pipe from C-4 would have to be installed across unimproved terrain.
- 3. The well is readily accessible from an existing maintained road. C-4 is not.

In either case, there is a strong possibility that the spring in Kelvin Canyon will dry up. The City must come to grips with this possibility. Do they want to mitigate the landfills or maintain the spring? If the spring is more important than mitigating the landfills, we should forget our efforts to mitigate the landfills.

By the way, welcome to RPV. Please let me know if I can be of assistance to you. For example, I will gladly show you the wells or give you a tour of the landfills. If you need me, just give me a call at (213) 255-7873.

RECEIVED

JUN 27 1988