

# CHAPTER 12

## Lead Agency Revisions to Final PEIR

---

This chapter provides a compilation of revisions made to the Draft PEIR following the public review period in addition to those included in Chapter 11 as a result of responses to comments.

### Executive Summary

The proper name of the lead agency has been clarified in the first sentence on page ES-1 and subsequently throughout the entire document as follows:

~~The County of Los Angeles Department of Public Works Waterworks District 40~~ Los Angeles County Waterworks District No 40, Antelope Valley (LACWWD40) as the Lead Agency has prepared this Draft Program Environmental Impact Report (PEIR) in consultation with the following Responsible Agencies...

The total annual demand for recycled water in the Antelope Valley has been revised to include demand in the RCSD service area in Kern County. The text on page ES-3 has been changed as follows:

For existing and future end users identified to-date, the annual demand for recycled water in the Antelope Valley is estimated at ~~21,210~~ 20,091 afy at buildout (Kennedy/Jenks, 2006). The system capacity of the proposed project would be designed to meet this demand. This demand includes ~~17,491~~ 18,610 afy for M&I end uses in the project area (Kennedy/Jenks, 2006) and 2,600 afy for use as cooling water at the planned Palmdale Hybrid Power Plant.

### Chapter 3.2 Air Quality

The following changes to the text on pages 3.2-17 and 3.2-18 have been made to more clearly articulate the effects of the proposed project to climate change and identify the reduction in greenhouse gas emissions that would result due to the offset of imported potable water with locally produced recycled water:

**Impact 3.2-5: The proposed project would result in fewer greenhouse gas emissions than would result from importing a similar amount of water. ~~could conflict with implementation of state goals for reducing greenhouse gas emissions and thereby have a negative effect on global climate change.~~ Less than Significant.**

As with other individual relatively small projects (i.e., projects that are not cement plants, oil refineries, electric generating facilities/providers, co-generation facilities, or hydrogen plants or other stationary combustion sources that emit more than 25,000 metric tons CO<sub>2</sub>E/yr), the project specific emissions from this proposed project would not be expected to individually have an impact on global climate change (AEP, 2007). Rather the proposed project would be inherently energy efficient since it would produce less CO<sub>2</sub> than is required for importing a similar amount of water, and the primary concern would be whether the proposed project would be in conflict with the state goals for reducing greenhouse gas emissions.

~~Two types of analyses are used to determining whether the proposed project could be in conflict with the state goals for reducing greenhouse gas emissions. The analyses are reviews of:~~

~~A. The potential conflicts with the CARB 44 early action strategies; and~~

~~B. The basic parameters of the project to determine whether its design is inherently energy efficient.~~

~~With regard to Item A, the proposed project does not pose any apparent conflict with the most recent list of the CARB early action strategies (see Table 3.2-4).~~

~~With regard to Item B, the~~ The proposed project would provide the primary backbone system for distribution of recycled water to local users in the Antelope Valley, which would use less energy in the long term relative to alternative water sources. A recently published resource book on the significance of greenhouse gas emissions in California from various projects presents an example “Green List” of the types of projects that may have a beneficial effect on greenhouse gas emissions and climate change. The draft Green List includes recycled water projects that reduce energy consumption related to water supplies that service existing development, such as the proposed project (CAPCOA, 2008). For the proposed project, the end uses for the recycled water would otherwise be met with imported potable water if the proposed project were not implemented. The imported water would be delivered through the SWP, which consumes a substantial amount of energy to convey water to southern California from the Sacramento-San Joaquin River Delta in northern California. A recent study by West Basin Municipal Water District has shown that the energy required to import SWP water is over six times the energy requirement for Title 22 recycled water when considering kilowatt-hours per acre-foot (LACSD, 2008). In addition, the same study indicates that Title 22 recycled water produces 338 tons of CO<sub>2</sub> for every 1000 af of water produced, while the SWP produces 2,250 tons of CO<sub>2</sub> for every 1000 af of water imported (LACSD, 2008; USEPA, 1995).<sup>1</sup> Therefore, Based on this analysis, the proposed project would be considered to be inherently energy efficient and would have a less than significant impact on greenhouse gasses. reduce the amount of CO<sub>2</sub> produced due to potable offset with recycled water.

<sup>1</sup> Conversion factor: kWh/1333.333 = tons CO<sub>2</sub>. (USEPA, 1995)

In addition, the proposed project would not conflict with state goals in AB32 for reducing greenhouse gas emissions. Two types of analyses are used to determining whether the proposed project could be in conflict with the state goals for reducing greenhouse gas emissions. The analyses are reviews of:

A. The potential conflicts with the CARB 44 early action strategies; and

B. The basic parameters of the project to determine whether its design is inherently energy efficient.

With regard to Item A, the proposed project does not pose any apparent conflict with the most recent list of the CARB early action strategies (see Table 3.2-4). With regard to Item B, as discussed above, the proposed project design is inherently energy efficient. The proposed project would not conflict with state goals for reducing greenhouse gas emission. There would be no impact.

~~The review of Items A, and B indicates that the proposed project would not conflict with the state goals in AB32, would be energy efficient, and would reduce greenhouse gas emissions produced for water delivery. Therefore, this impact would be less-than-significant.~~

## Chapter 4.0 Cumulative Impacts

The following changes to the text on pages 4-6 and 4-7 have been made to clarify the significance of the cumulative impacts to air quality associated with construction of the proposed project:

Construction of the proposed project together with the identified cumulative projects located in the Antelope Valley would contribute additional emissions to existing conditions in the Antelope Valley air basin. The Antelope Valley is located primarily in Los Angeles County, which is in non-attainment for ozone, PM<sub>10</sub> and PM<sub>2.5</sub> (see Chapter 3.2, Air Quality). The contribution of additional pollutants to an already impaired air basin could be considered a significant impact. Construction of the proposed project would result in emissions that exceed the significance thresholds established by the Antelope Valley Air Quality Management District (AVAQMD) and the Kern County Air Pollution Control District (KCAPCD) (see Chapter 3.2, Air Quality). ~~Therefore, construction of the proposed project, together with the projects listed in Table 4-1, could result in significant cumulative impacts to air quality in the Antelope Valley.~~

As described in Chapter 3.2, Air Quality, LACWWD40 in coordination with its partner agencies would be required to implement Mitigation Measures 3.2-1a through 3.2-1f, in accordance with the AVAQMD Air Quality Management Plan (AQMP) and Air Quality Attainment Plan (AQAP), to reduce emissions related to construction of pipelines, storage reservoirs, and pump stations to less than significant levels. These mitigation measures include control measures, such as a fugitive dust program, established by the AVAQMD and KCAPCD for reduction of emissions related to construction activities.

The AQMP identifies construction activities as factors contributing to overall emissions sources; however, the AQMP does not conclude that individual construction projects would delay the attainment of air quality standards for the basin. Therefore, the proposed project is ~~not considered to~~ would not have a cumulatively considerable impact on air quality.

Greenhouse gas (GHG) impacts are considered to be exclusively cumulative impacts. The discussion of project impacts to greenhouse gas emissions provided in Chapter 3.2 analyzes the cumulative impacts of the proposed project to GHGs and climate change and concludes there would be less than significant impacts due to relative reductions in emissions of CO<sub>2</sub>. For clarity, an additional impact statement and discussion of cumulative impacts to GHGs has been added to page 4-11 of Chapter 4.0. The following text has been added:

**Impact 4-6: The proposed project would result in fewer greenhouse gas emissions than would result from importing a similar amount of water. Less than Significant.**

The proposed project would result in an increase in the beneficial reuse of recycled water for non-potable applications, offsetting current and future use of imported potable water for such uses. As described in Chapter 3.2, Air Quality, the proposed project would provide the primary backbone system for distribution of recycled water to local users in the Antelope Valley, which would use less energy in the long term relative to alternative water sources such as imported water. For the proposed project, the end uses for the recycled water would otherwise be met with imported potable water if the proposed project were not implemented. The imported water would be delivered through the SWP, which consumes a substantial amount of energy to convey water to southern California from the Sacramento-San Joaquin River Delta in northern California. A recent study by West Basin Municipal Water District has shown that the energy required to import SWP water is over six times the energy requirement for Title 22 recycled water when considering kilowatt-hours per acre-foot (LACSD, 2008). In addition, the same study indicates that Title 22 recycled water produces 338 tons of CO<sub>2</sub> for every 1,000 af of water produced, while the SWP produces 2,250 tons of CO<sub>2</sub> for every 1,000 af of water imported (LACSD, 2008; USEPA, 1995).<sup>2</sup> Based on this analysis, the proposed project would reduce the relative amount of GHG emissions produced for every acre-foot of water provided by the proposed project and would be considered to be inherently energy efficient. Therefore, the proposed project would result in a cumulative net reduction of future GHG emissions relative to future GHG emissions without the project. The effects of the proposed project to greenhouse gas emissions would not be cumulatively considerable.

**Mitigation Measures**

None required.

---

<sup>2</sup> Conversion factor: kWh/1333.333 = tons CO<sub>2</sub>. (USEPA, 1995)