

Appendix E
City Council Correspondence

ENERGY AND THE ENVIRONMENT

MOTION

The Department of Public Works is in the process of planning the development of new sewer lines as part of a comprehensive planning effort to meet the City's needs for the next 20 years and address the aging infrastructure. The planned sewers will extend from Cypress Park to North Hollywood and is proposed to go through parts of the Valley between Griffith Park and Toluca Lake. These sewer projects, which are known as the Glendale Burbank Interceptor Sewer (GBIS) and the Northeast Interceptor Sewer Phase II (NEIS II), are estimated to cost more than \$150 million each and will be started after 2010.

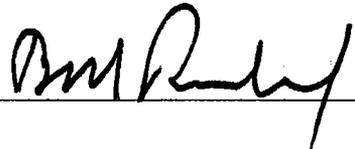
These projects are part of the Integrated Resources Plan Draft Environmental Impact Report (IRP-DEIR) that has been issued for public review in November 2005 and will end on February 27, 2006. However, these communities as well as the Council office have requested that the Bureau of Sanitation look into some alignment modifications, and to extend the public review period of the IRP-DEIR another 30 days.

In order to appropriately address the concerns of local residents, the Department of Public Work's Bureaus of Sanitation and Engineering should allow residents and stakeholders more time to comment on the proposed sewer routes in the DEIR.

I THEREFORE MOVE that the City Council direct the Bureau of Sanitation and the Bureau of Engineering to extend the public review period on the DEIR another 30 days, until 5 PM on March 31, 2006, for input on the IRP-DEIR including the proposed Glendale Burbank Interceptor Sewer and the Northeast Interceptor Sewer Phase II projects.

PRESENTED BY 
TOM LABONGE
Councilman, 4th District


WENDY GREUEL
Councilwoman, 2nd District

SECONDED BY 

February 24, 2006

06-0234-21
CDs 244



CITY OF LOS ANGELES
CALIFORNIA

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March 17, 2006

#1 SAN/CE

Mayor Antonio R. Villaraigosa
Room 303, CH
Attn: June Lagmay

Subject: JOINT REPORT TO CITY COUNCIL REGARDING THE INTEGRATED RESOURCES
PLAN DRAFT ENVIRONMENTAL IMPACT REPORT (MOTION 06-0234)

As recommended in the accompanying report of the Directors of the Bureaus of Sanitation and Engineering, which this Board has adopted, the Board of Public Works requests approval and forwarding to the City Council for approval of the attached report on the feasibility of using alterations to the proposed sewer routes in the draft environmental impact report.

Concerns have been expressed by residents regarding the impact that the Glendale/Burbank Interceptor Sewer construction project would have on their neighborhoods as well as the residential areas in the City of Burbank. On February 1, 2006, the City Council passed a motion (Council File 06-0234) instructing "the Bureau of Sanitation and the Bureau of Engineering to report back in 30 days on the feasibility of utilizing alterations to the proposed water routes..." This report responds to that direction by the City Council.

Fiscal Impact Statement:

There will be no fiscal impact to the General Fund.

Respectfully submitted,

James A. Gibson
Executive Officer
Board of Public Works

JAG:cg

DEPARTMENT OF PUBLIC WORKS

BUREAU OF SANITATION
BUREAU OF ENGINEERING
JOINT BOARD REPORT NO. 1
MARCH 17, 2006


Secretary

CD: All

JOINT REPORT TO CITY COUNCIL REGARDING THE INTEGRATED RESOURCES
PLAN DRAFT ENVIRONMENTAL IMPACT REPORT (MOTION 06-0234)

RECOMMENDATION

Adopt this Joint Report on the feasibility of using alterations to the proposed sewer routes in the DEIR and forward the report with transmittals to the City Council for consideration.

FISCAL IMPACT STATEMENT

There will be no fiscal impact to the General Fund.

TRANSMITTALS

1. Copy of City of Los Angeles Council Motion 06-0234 (February 1st, 2006)
2. Copy of Joint Report regarding the Integrated Resources Plan Draft Environmental Impact Report.
3. Copy of City of Los Angeles Council Motion 06-0234-S1 (February 24th, 2006)

DISCUSSION

The Integrated Resources Plan - Facilities Plan (IRP Facilities Plan) is an integrated wastewater facilities plan that describes the existing wastewater, recycled water, and runoff systems in the City of Los Angeles, identifies system needs for the year 2020 and beyond, and provides recommended alternatives to address the future needs of the systems. In November 2005, the City released the Integrated Resources Plan Draft Environmental Impact Report (DEIR) in accordance with the California Environmental Quality Act Guidelines. The DEIR provides a description of the alternatives and provides an analysis of the impacts. All of the alternatives include the construction of two major sewers: The Glendale Burbank Interceptor Sewer (GBIS) and Phase II of the Northeast Interceptor Sewer (NEIS II).

Concerns have been expressed by residents regarding the impact that the Glendale Burbank Interceptor Sewer (GBIS) construction project would have on their neighborhoods as well as residential areas in the City of Burbank. On February 1, 2006, the City Council passed Motion 06-0234 instructing "the Bureau of Sanitation and the Bureau of Engineering report in 30 days on the feasibility of utilizing alterations to the proposed sewer routes in the DEIR, such as along existing public right of ways including the right of way along the Los Angeles River in the vicinity of Universal City South of the Toluca Lake Community, for the proposed Glendale

BUREAU OF SANITATION
BUREAU OF ENGINEERING
JOINT REPORT NO. 1
MARCH 17, 2006

Page 2

Burbank Interceptor Sewer and the Northeast Interceptor Sewer Phase II project. (Transmittal No. 1.) As part of the report, the Bureaus of Sanitation and Engineering review the adequacy of the current public review period for the Draft Environmental Impact Report."

Evaluation of the Los Angeles River as a potential alternative for the Northeast Interceptor Sewer Phase II (NEIS II) and GBIS projects reveals a number of issues that will likely prevent the use of this alternative as a feasible and viable option. For instance, real estate issues, and future development and revitalization along the river make any potential sewer project along the river challenging to implement. But more importantly, flood control risks, and constructability constraints suggest that use of the Los Angeles River right of way as a potential sewer corridor is either not constructible, not advisable due to good engineering judgment and practice, or both.

It is believed that a modified alignment that combines the eastern half of GBIS South Alignment and the western half of the GBIS North Alignment may be a potential solution that provides the needed project while avoiding the areas of concern. The connecting alignment would be tunneled under a street within a corridor between Clybourn Ave and Pass Avenue depending on existing underground structures and geotechnical considerations. Since the modified alignment is essentially a recombination of the two GBIS alignments, which have been already analyzed in the DEIR, it would not be necessary to revise and recirculate the DEIR with the modified configuration. It can be addressed as a recommendation to be made as part of the Preferred Alternative selection process in the Final EIR. Joint Report to Council Motion 06-0234 evaluate potential alignments in response to City of Los Angeles Council Motion 06-0234. (Transmittal No. 2.)

To allow for additional public input and participation, on February 24, 2006 the City Council has adopted a motion extending the public review period of the IRP DEIR. The new review period is extended to March 31, 2006. (Transmittal No. 3).

(AH VA WL TH)

Respectfully submitted,


RITA L. ROBINSON, Director
Bureau of Sanitation


GARY LEE MOORE, P.E.
City Engineer

Prepared by:
Fernando F. Gonzalez, WESD
(323) 342-6267

CITY OF LOS ANGELES
CALIFORNIA

FRANK T. MARTINEZ
City Clerk

KAREN E. KALFAYAN
Executive Officer

When making inquiries
relative to this matter
refer to File No.



ANTONIO R. VILLARAIGOSA
MAYOR

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CLAUDIA M. DUNN
Chief, Council and Public Services Division

06-0234-S1

CDs 2 & 4

March 17, 2006

Councilmember Greuel
Councilmember LaBonge
Councilmember Rosendahl
Board of Public Works
Bureau of Sanitation
Bureau of Engineering

RE: PUBLIC REVIEW PERIOD FOR THE INTEGRATED RESOURCES PLAN - DRAFT
ENVIRONMENTAL IMPACT REPORT, INCLUDING THE PROPOSED GLENDALE BURBANK
INTERCEPTOR SEWER AND THE NORTHEAST INTERCEPTOR SEWER PHASE II
PROJECTS

At the meeting of the Council held March 17, 2006, the following action was
taken:

Attached report adopted.....	_____
Attached motion (LaBonge - Greuel - Rosendahl) adopted.....	_____ X _____
Attached resolution adopted.....	_____
Motion adopted to approve attached report.....	_____
Motion adopted to approve committee report recommendation(s)...	_____
To the Mayor FORTHWITH.....	_____
Findings adopted.....	_____
Negative Declaration adopted.....	_____
Categorical exemption approved.....	_____
Generally exempt.....	_____

Frank T. Martinez

City Clerk
SOS



ENERGY AND THE ENVIRONMENT

MOTION

The Department of Public Works is in the process of planning the development of new sewer lines as part of a comprehensive planning effort to meet the City's needs for the next 20 years and address the aging infrastructure. The planned sewers will extend from Cypress Park to North Hollywood and is proposed to go through parts of the Valley between Griffith Park and Toluca Lake. These sewer projects, which are known as the Glendale Burbank Interceptor Sewer (GBIS) and the Northeast Interceptor Sewer Phase II (NEIS II), are estimated to cost more than \$150 million each and will be started after 2010.

These projects are part of the Integrated Resources Plan Draft Environmental Impact Report (IRP-DEIR) that has been issued for public review in November 2005 and will end on February 27, 2006. However, these communities as well as the Council office have requested that the Bureau of Sanitation look into some alignment modifications, and to extend the public review period of the IRP-DEIR another 30 days.

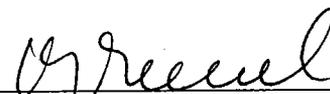
In order to appropriately address the concerns of local residents, the Department of Public Work's Bureaus of Sanitation and Engineering should allow residents and stakeholders more time to comment on the proposed sewer routes in the DEIR.

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PRESENTED BY

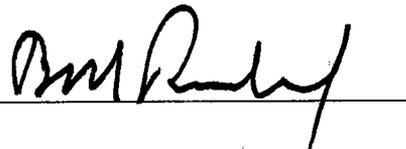


TOM LABONGE
Councilman, 4th District



WENDY GREUEL
Councilwoman, 2nd District

SECONDED BY



MOTION
ADOPTED

MAR 17 2006

LOS ANGELES CITY COUNCIL

February 24, 2006

2005
Feb 24



.....

DRAFT Joint Report to City Council Motion 06-0234

**Regarding Integrated Resources Plan
Draft Environmental Impact Report**

**City of Los Angeles
Department of Public Works
Bureau of Engineering
Bureau of Sanitation**

February 2006

EXECUTIVE SUMMARY

The Integrated Resources Plan - Facilities Plan (IRP Facilities Plan) is an integrated wastewater facilities plan that describes the existing wastewater, recycled water, and runoff systems in the City of Los Angeles, identifies system needs for the year 2020 and beyond, and provides recommended alternatives to address the future needs of the systems. In November 2005, the City released the Integrated Resources Plan Draft Environmental Impact Report (DEIR) in accordance with the California Environmental Quality Act Guidelines. The DEIR provides a description of the alternatives and provides an analysis of the impacts. All of the alternatives include the construction of two major sewers: The Glendale Burbank Interceptor Sewer (GBIS) and Phase II of the Northeast Interceptor Sewer (NEIS II)

Concerns have been expressed by residents regarding the impact that the Glendale Burbank Interceptor Sewer (GBIS) construction project would have on their neighborhoods as well as residential areas in the City of Burbank. On February 1, 2006, the City Council passed Motion 06-0234 instructing “the Bureau of Sanitation and the Bureau of Engineering report in 30 days on the feasibility of utilizing alterations to the proposed sewer routes in the DEIR, such as along existing public right of ways including the right of way along the Los Angeles River in the vicinity of Universal City South of the Toluca Lake Community, for the proposed Glendale Burbank Interceptor Sewer and the Northeast Interceptor Sewer Phase II project. As part of the report, the Bureaus of Sanitation and Engineering review the adequacy of the current public review period for the Draft Environmental Impact Report.”

Evaluation of the Los Angeles River as a potential alternative for the North East Interceptor Sewer Phase II (NEIS II) and GBIS projects reveals a number of issues that will likely prevent the use of this alternative as a feasible and viable option. For instance, real estate issues, and future development and revitalization along the river make any potential sewer project along the river challenging to implement. But more importantly, flood control risks, and constructability constraints suggest that use of the Los Angeles River right of way as a potential sewer corridor is either not constructible, not advisable due to good engineering judgment and practice, or both.

It is believed that a modified alignment that combines the eastern half of GBIS South Alignment and the western half of the GBIS North Alignment (connects the two GBIS alignments along Clybourn Avenue, or parallel street) may be the desired solution that provides the needed project while avoiding the areas of concern. Since the modified alignment is essentially a recombination of the two GBIS alignments, which have been already analyzed in the DEIR, it would not be necessary to revise and recirculate the DEIR with the modified configuration. It can be addressed as a recommendation to be made as part of the Preferred Alternative selection process in the Final EIR.

To allow for additional public input and participation, the City Council will consider adopting a motion extending the public review period of the IRP DEIR. The new review period would have been extended to March 31, 2006.

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Introduction

The Integrated Resources Plan - Facilities Plan (IRP Facilities Plan) is an integrated wastewater facilities plan that describes the existing wastewater, recycled water, and runoff systems in the City of Los Angeles, identifies system needs for the year 2020 and beyond, and provides recommended alternatives to address the future needs of the systems.

In November 2005, the City released the Integrated Resources Plan Draft Environmental Impact Report (DEIR) in accordance with the California Environmental Quality Act Guidelines. The DEIR provides a description of the alternatives and provides an analysis of the impacts. All of the alternatives include the construction of two major sewers: The Glendale Burbank Interceptor Sewer (GBIS) and Phase II of the Northeast Interceptor Sewer (NEIS II)

The DEIR analyzed four Project Alternatives. A fifth alternative, the No Project Alternative was also analyzed to compare the impacts of the proposed alternative and its components compared with the impacts of the no project alternative. Each Proposed Alternative supplies a plan for specific improvements or expansions at the City of Los Angeles wastewater collection system, wastewater treatment plants and water reclamation plants, expansion of the existing recycled water system, and facilities and strategies to manage urban runoff.

On February 1, 2006, Council Motion 06-0234 was introduced instructing the Bureaus of Engineering (BOE) and Sanitation (BOS) to “explore” feasible and viable alternatives to the proposed sewer routes for the Northeast Interceptor Sewer Phase II (NEIS II) and the Glendale Burbank Interceptor Sewer (GBIS) as shown in the Draft Environmental Impact Report (DEIR) for the Integrated Resources Plan (IRP) with emphasis given to the possibility of using the existing Los Angeles River corridor and/or any nearby or contiguous public right of way. As cited in the motion, the purpose of exploring use of any existing public right of way would be to lessen construction related impacts to the neighboring local communities. The motion requires that the BOE and BOS report back to the Council within 30 days.

This report is prepared to respond to above-mentioned Council Motion. This report will explore and review the feasibility of modifying the alignments and evaluate the adequacy of the current public review period for the DEIR.

Background

Future population increases in the City of Los Angeles and its service areas would result in increased wastewater flows that must be managed safely. Also, future laws and regulations are likely to require additional facilities, facility improvements, or new strategies for managing wastewater, recycled water, and urban runoff in the future. The existing wastewater, recycled water, and runoff infrastructure would not be able to meet future needs adequately by the year 2020. As a consequence, the City of Los Angeles, in

partnership with various community organizations and stakeholders, has developed four Alternatives as part of the IRP Facilities Plan for meeting future needs for wastewater, recycled water, and urban runoff.

All four alternatives described in the IRP Facilities Plan include the construction of high capacity wastewater collection lines. The construction of the NEIS II and the GBIS projects are estimated to begin around 2010 and 2011 respectively with construction duration of three to four years each. They will extend the City's new major trunkline sewer system from Cypress Park to North Hollywood using tunneling construction methods. Extending the City's trunkline sewer system to North Hollywood will enable the City to relieve and rehabilitate the existing North Outfall Sewer (NOS) that was built in the 1920s and has been the backbone of the City's sewer system for over seventy years. These new trunkline sewers are necessary because the NOS is aging and too small for the City's current and continuing needs. Construction of NEIS II and GBIS will provide much-needed additional sewerage capacity to the City's sewer system for the current flow quantities as well as provide sufficient capacity for the future.

Since the mid1990's, the City has systematically and successfully planned, designed and completed construction of a combined twenty five miles of similar trunk lines (utilizing tunneling construction methods) within the City and adjacent communities that extends from the Hyperion Treatment Plant to Culver City, across South Los Angeles and the Central City then northerly to Cypress Park. The most recent projects being completed were the East Central Interceptor Sewer (ECIS) and the Northeast Interceptor Sewer Phase I (NEIS I). These twenty five miles of trunkline sewers have traveled through all varieties of communities and neighborhoods, residential and commercial/industrial, and in each case, the City has been successful in administering the construction of the projects while attending to the needs of each unique community within which the projects passed. For instance, the NEIS I project was recently completed in 2005. In addition to the mitigation measures which the City included in the construction contract to lessen impacts to adjacent communities, the City also earmarked an additional one million dollars for the sole purpose of addressing any needed community relief that might have occurred during construction. Due to the effort that the City performed during the planning and design phases of the project and the resulting relationship that was built between the City's project team and the neighboring communities, the vast majority of this allowance was never needed during construction and the needs of the communities were maintained.

The proposed sewer routes identified in the DEIR were identified and selected as feasible and viable alternatives as part of the planning process for these projects. The planning and alternative screening process for the DEIR Alternatives included identification and evaluation of numerous alternative alignments, which ultimately determined that the alternatives offered in the DEIR provided stakeholders the most value with the least impacts. Because there is no way to construct any infrastructure project without construction related impacts, and because the City is committed to minimizing those impacts as much as possible, the planning and alternative

screening process identified and included many factors in the evaluation of its many alternatives. Some of the factors that were considered along each proposed route include: numbers of sensitive receptors (schools, hospitals, churches, libraries, police/fire stations, community/daycare centers, parks, historical sites, etc.); numbers of critical crossings (bridges, major utilities, freeways, seismic faults, Los Angeles River, railroads, notable adjacent buildings, etc.); major traffic corridors; constructability factors; known geologic information; ability to mitigate construction related impacts during construction; and more. The technical discussion, below, will address and evaluate the engineering factors that limit the use of existing public right of way such as the Los Angeles River as a feasible and viable alternative for the installation of the NEIS II and GBIS projects.



Bureau of Sanitation
City of Los Angeles

Sanitation
Public Works

Figure 1 - Description of GBIS Alignments on DEIR

From the Integrated Resources Plan EIR

Description of GBIS Alignments in DEIR

The GBIS would be approximately 5.75 miles long and would be constructed using man-entry tunneling methods. Construction of the primary tunnel system and the finished pipe would take approximately three to four years.

- The GBIS South Alignment would extend from the NEIS II northern terminus in a west-northwesterly direction beneath the northeastern portion of Griffith Park toward Travel Town, then in Forest Lawn Drive approximately to Barham Boulevard. This alignment would then cross under the Los Angeles River to Valley Spring Lane, north along the east side of U.S. Highway 101 (U.S. 101), west along Moorpark Avenue beneath SR-170 to its western terminus at Woodbridge Park or the Caltrans North Hollywood Maintenance Yard. The GBIS South Alignment would be located mostly on the south side of the Los Angeles River. The GBIS South Alignment would cross the Los Angeles River, SR-134, SR-170, and an abandoned water gallery (See Figure 1).
- The GBIS North Alignment would extend from the NEIS II northern terminus (Pecan Grove site, Los Angeles Zoo shaft site or Observatory Annex site) in a west-northwesterly direction to Woodbridge Park or the Caltrans North Hollywood Maintenance Yard (See Figure 1).

Description of GBIS Modified Alignments

In response to the referenced Council motion, the City reviewed the possibility for additional alternative alignments that could be utilized for the installation of NEIS II and GBIS. The review included considerations for the physical constraints and engineering parameters while attempting to satisfy the intent of the motion and address the concerns expressed by the neighborhoods and residential areas along the proposed northerly and southerly GBIS alignments. Three modified alternatives using the existing proposed GBIS South Alignments starting at LA Zoo (vicinity) Shaft Site with the modification starting at the Barham Shaft Site were considered in this feasibility analysis.

Description of Modified Alignment No. 1

The modified Alignment combines the eastern half of GBIS South Alignment and the western half of the GBIS North Alignment. The connecting alignment would be tunneled under a street within a corridor between Clybourn Ave and Pass Avenue depending on existing underground structures and geotechnical considerations (See Figure 2).

Description of Modified Alignment No. 2

Commencing at the proposed Barham Blvd shaft site tunneling west along the southern boundary of the Los Angeles River easement to the Hollywood

freeway. Tunneling across the Los Angeles River proceed north-west along the western boundary of the Hollywood freeway easement to the proposed Caltrans North Hollywood or Woodbridge Park shaft sites.

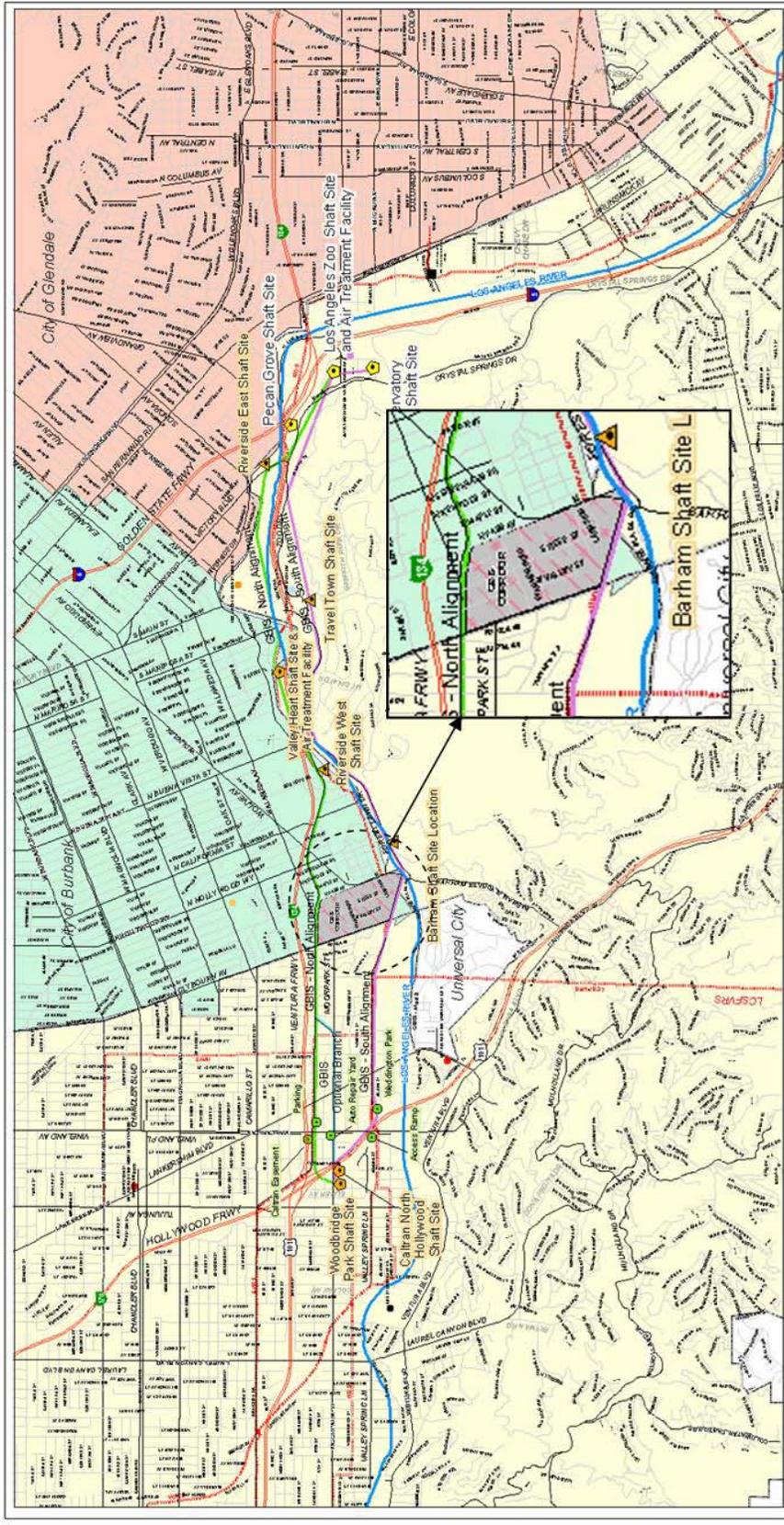
Description of Modified Alignment No. 3

Commencing at the proposed Barham Blvd shaft site tunneling north across the Los Angeles River. Proceed west along the northern boundary of the Los Angeles River easement to the Hollywood freeway. Proceed tunneling north-west along the western boundary of the Hollywood freeway easement to the proposed Caltrans North Hollywood or Woodbridge Park shaft sites.

Analysis of Alternative No.1

The Department of Water and Power (DWP) is planning to construct a 78-inch waterline within a steel or concrete casing by jacking or tunneling beneath Clybourn Avenue. Preliminary investigation and a coordination meeting with representatives of DWP on February 16, 2006 indicates that this hybrid would be both feasible and viable and could occur in Clybourn Avenue or a neighboring street either in the City of Burbank or within the City of Los Angeles as needed. The City of Burbank was informed of this development and expressed their interest in this alternative.

This alignment modification will avoid the sensitive areas in Burbank and avoid going through Valley Spring Lane in Toluca Lake.



Bureau of Sanitation
City of Los Angeles

From the Integrated Resources Plan EIR

GBIS Alignments

GBIS EIR Alignments

- GBIS - Optional Branch
- GBIS - North Alignment
- GBIS - 2nd South Alignment
- GBIS Mod
- GBIS Corridor

Point Types

- Shaft
- Shaft/ATF
- GBIS Permanent Facilities
- NER Shaft Site

Existing Layers

- LOS ANGELES RIVER
- Building Outlets
- Highway
- Street
- Freeway
- City Boundary
- Los Angeles City
- Burbank City
- Glendale City

Cultural Landmarks

- ARTS CENTER OF WESTERN EXPLORE/RESEARCH
- BEASLEY TOWER CENTER
- CELESTINE CENTER
- METRO AERIAL LINE
- TRAVELERS RESTAURANT

Scale: 0 0.25 0.5 1 Mile
North Arrow

Figure 2 - Modified GBIS Alignment No. 1

Analysis of Alternatives Near the L.A. River

Evaluation of the Los Angeles River as a potential alternative for the NEIS II and GBIS projects revealed a number of issues that will likely prevent the use of this alternative as a feasible and viable option. For instance, real estate issues, and future development and revitalization efforts along the river make any potential sewer project along the river challenging to implement. But more importantly, flood control risks, and constructability constraints suggest that use of the Los Angeles River right of way as a potential sewer corridor is either not constructible, not advisable due to good engineering judgment and practice, or both.

Los Angeles River Revitalization

Currently, there are schematic plans that propose certain improvements along the Los Angeles River that provide for its revitalization. These plans, propose many improvements along the river such as green belts, public access areas, etc. Because these revitalizing improvements would reduce the capacity of the Los Angeles River to convey flood control waters during storm events, there are also flood culverts proposed to be installed under the river's levees and topside access roads intended to supply the necessary capacity needed to convey all drainage runoff.

Because any proposed sewer alignment within the Los Angeles River right of way could not be directly beneath the invert of the river (due to constructability, maintenance and safety reasons), it would need to be beneath the same levees and access roads for the river. If major flood culverts are constructed beneath the river's levees, and if a major trunkline sewer is also constructed deeper beneath the river's levees then the installation of maintenance holes over the sewer for the purposes of operations and maintenance could not be possible due to the presence of the flood culverts above. Without maintenance holes, the City would not be able to properly maintain the sewers creating a potential for unknown and unexpected failure of the sewer.

Constructability Assessment

Because of their size and depth, construction of these large trunkline sewer projects must utilize tunnel construction methods. For the most part, this construction method is invisible to the general public because all construction activities occur beneath ground surface and tunneling can travel long distances through neighborhoods with significantly fewer impacts than any other construction method. In some cases, a neighborhood may never know construction is passing through its community. In order to construct these large projects in tunnels, large staging areas are required. The staging areas are used to dig a tunneling pit to the depth of the proposed sewer where all mining activities originate. The staging area handles all of the soil that is removed from the tunnel as well as stores all construction related equipment and materials for the duration of the construction activity. Routinely, the size of these staging areas must be at least one acre. In addition to the staging areas where tunneling begins, there must also be somewhat smaller areas-

called receiving pits-where the tunneling machine is removed after completing excavation. In addition to these necessary pits, maintenance holes (MHs) must be installed along the new sewer at approximately one-half mile intervals.

Construction of NEIS II and/or GBIS within the limits of the Los Angeles River right of way would not be possible for a couple of reasons. First, there isn't enough room in the access roads atop the river to support staging of the construction. The necessary heavy construction equipment is too large to fit on the road, and the size of the necessary tunneling and receiving pits are much larger than the road. Second, installation of these sewers within the limits of the river itself is not possible because the construction operations, as described (staging areas, tunneling and receiving pits, maintenance hole installation, etc.), will last for periods of up to 3 years. The flood control needs of the river cannot support this construction activity for this duration. Further, the required maintenance holes, for the sewers, would be directly in the riverbed, which would be dangerous for the continued operation of the river, would be potentially detrimental to the maintenance hole structure and the sewer, would jeopardize the flow carrying capacity of the sewer during storms, and would be unnecessarily hazardous to operations and maintenance personnel to enter the riverbed to perform routine maintenance. Because the sewer construction could not occur within the access roads atop the river or within the river itself, it is therefore not possible to construct either NEIS II or GBIS totally within the limits of the Los Angeles River right of way.

In addition to the physical constraints of an inadequate construction area, there are also significant geologic conditions below ground that suggest an alignment directly beneath the river may be problematic during construction. The Los Angeles River through this area follows the natural and historic drainage watercourse. As such, deposition of layer upon layer of sediment, such as sand, cobbles and extremely large boulders, has occurred over centuries and exist directly beneath the river along its present alignment. The layers of sedimentation extend very deep and it is expected that tunneling of these projects will encounter these deposits. Because very large boulders are likely to exist and because very large boulders can actually derail tunneling operations from progressing, it is not desirable to use a tunneling corridor that maximizes exposure to potential large boulders. Therefore, good engineering judgment again recommends against selecting a sewer tunnel route along the Los Angeles River alignment. As a matter of fact, the proposed sewer routes, identified in the DEIR, propose crossing the river instead of following its path. In so doing, exposure to potentially encountering such a boulder is minimized. Additionally, during design, isolated exploratory geotechnical investigations will be performed to further identify and minimize potential for encountering any boulder that could prevent tunneling from progressing.

Risks

The Los Angeles River is the preeminent flood control device for the entire portion of the City and its neighbors through this area. During storms, it carries millions of gallons per minute along its route and its performance is

vital. Because of the function that it provides, from an engineering standpoint, this is a critical structure. Critical structures are ordinarily considered to be anything that could cause massive disruption with possible significant public safety implications. Other examples of critical structures are freeways, bridges, railroads, etc. Because of the nature of these types of facilities it is easy to see how severing service would greatly impact the community and general public, and in many circumstances could result in catastrophe. In the case of the Los Angeles River any failure could result in wide spread destruction, flooding, with potential public health hazards. To prevent such impacts, good engineering practice dictates that exposure to any critical structures be avoided. When avoiding a critical structure cannot be achieved, then best engineering practice mandates minimizing exposure to the critical structure. Ordinarily, this means crossing the structure only where necessary and at 90 degree angles. Any alternative sewer route that runs parallel to, adjacent to and beneath the Los Angeles River would not minimize, but would rather maximize, exposure to the river and potential risk to public safety.

Real Estate

Through the geographic area that NEIS II and GBIS are proposed, the public right of way for the Los Angeles River consists mostly of private property owned by private entities over which a public easement has been granted for the purposes of flood control and drainage. There are also, certain other areas where existing overhead power lines exist either contiguous to the river or nearby. Similarly, the public rights of way for these overhead installations are recorded solely for the purposes of overhead power lines. In neither case do these types of easements allow for the installation of any public sewer. Therefore, use of the Los Angeles River as a corridor for these projects would require extensive real estate acquisition activities to secure the necessary easements to allow for sewer construction.

Extension of the EIR Certification Process

The Draft EIR is currently undergoing a 90-day public review period (ending on February 27, 2006), which is twice as long as the required 45-day review period. The Council Motion has directed the Bureaus to review the adequacy of the public review period for the Draft EIR. Section 15015 of the CEQA Guidelines establishes a 45-day public review period for projects that have been submitted to the State Clearing House. The BOE has received a letter from the State Clearing House confirming the 45-day review period. Because the review period for the IRP EIR is twice the minimum required public review period, it is considered more than adequate to allow the public to review and provide comments on the Draft EIR. Responses will be prepared and published in the Final EIR for all substantive comments received on the Draft EIR during the review period. In addition, four public hearings were conducted for the public to comment on the DEIR.

To allow for additional public input and participation, the City Council adopted a motion extending the public review period of the IRP DEIR. The new review period has been extended to March 31, 2006.

IRP EIR Structure

The IRP EIR analyzes four build alternatives and the No Project Alternative. Each build alternative is a system wide alternative that integrates future wastewater treatment, wastewater conveyance, recycled water distribution, dry weather urban runoff management features, and wet weather urban management features. As part of the overall wastewater and water management components of the IRP, the DEIR evaluates two GBIS alignments, a north alignment and a south alignment. Each build alternative evaluated in the DEIR includes GBIS as a key wastewater conveyance system element. The DEIR analyzes the likely impacts of both the north and south GBIS alignments to ensure that an adequate level of review and public disclosure is associated with consideration of the GBIS wastewater conveyance system element. The DEIR does not identify which GBIS alignment is preferred. It should be noted that although GBIS is included in all of the IRP Build Alternatives, it would not be specifically approved by City Council upon approval of the IRP EIR. Rather, when various system operational criteria are met, a determination would be made that the GBIS alignment would be recommended by City staff based on various operational criteria and the approval of that recommendation would be made by the City Council in the future.

As part of the process of finalizing the EIR, City staff will identify the Preferred system-wide IRP Alternative to be implemented. As part of the process of preparing the Final EIR, the Bureaus will respond to all substantive comments submitted by the public and agencies, and identify the Preferred IRP Alternative. The recommended Preferred Alternative could also discuss which GBIS alignment should be considered for implementation.

As discussed below, the recommended hybrid alternative (Modified Alignment No. 1) is essentially a recombination of the two GBIS alignments analyzed in the DEIR. On this basis, it is unnecessary to include it as a new alternative for consideration, thus eliminating any additional unnecessary or redundant analysis of impacts. Rather, Modified Alignment No. 1 can be a recommendation that is made as part of the Preferred Alternative selection process, and is recommended and discussed in the Final EIR. For Modified Alignment No. 2, the discussion above under "Analysis of Alternatives along the L.A. River " notes that this alignment is infeasible for several reasons, including constructability and operational maintenance constraints. For these reasons, the L.A. River option was not carried forward for detailed analysis in the DEIR. If it were to be considered in the DEIR, it would result in impacts so significant that it would preclude implementation of that conveyance component in a way that would minimize disruption to local communities and be a cost effective alternative to either the proposed north or south GBIS alignment.

Modified Alignment No. 1

Modified Alignment No. 1 is essentially a combination of the eastern half of GBIS South Alignment and the western half of the GBIS North Alignment, both of which are analyzed in the Draft EIR for the IRP. This modified alignment would include a north-south section that connects the two GBIS alignments along Clybourn Avenue, or parallel street, approximately between Warner Boulevard and Riverside Drive. Because the modified alignment would be comprised of portions of the North and South GBIS alignments, which are both analyzed in the DEIR, this configuration would not result in new substantial impacts that are not already discussed in the DEIR, albeit in separate GBIS alignment discussions. In addition, Modified Alignment No. 1 would result in fewer impacts than the GBIS North Alignment because the modified alignment would avoid impacts associated with the Valley Heart Shaft Site and ATF at that location.

Because Modified Alignment No. 1 is essentially a recombination of the two GBIS alignments analyzed in the DEIR, it would not be necessary to revise and recirculate the DEIR with the modified configuration included as a separate alternative. Rather, Modified Alignment No. 1 can be a recommendation that is made as part of the Preferred Alternative selection process, and is recommended and discussed in the Final EIR. The Final EIR could include a discussion of any additional minor impacts of the hybrid configuration, a comparison of its impacts to the alignments discussed in the DEIR, and an alignment map of the modified alignment.

Modified Alignment No. 2 and Modified Alignment No. 3

As discussed above, this alternative was not included in the DEIR because of the potential for significant impacts that could not be mitigated. The remaining two modified alignments, Modified Alignment No. 2 and Modified Alignment No. 3 both include new corridors along the Los Angeles River. If these two alignment options are included in the DEIR, it would require additional environmental documentation because the alignments have not yet been developed beyond the concept stage and because they could result in significant impacts that have not been discussed in the existing Draft EIR.

Furthermore, features such as new shaft site locations, possible use conflicts, agency concerns, and stakeholder involvement may further affect feasibility of these alignments. These two modified alignments would need to be more fully developed (beyond the current concept stage) before they could be subjected to additional environmental documentation because it may not be possible to capture project-level evaluations based on the two currently conceptual modified alignments. In addition, GBIS is common to all of the build IRP Alternatives and any additional or new impacts associated with these two Los Angeles River alignment modifications would be reflected in each and every IRP Alternative. Thus, selection of the Preferred IRP Alternative can occur regardless of alignment controversy for GBIS.

Conclusions and Recommendations

1. The utilizing the Los Angeles River corridor and right of way as a parallel trunk line sewer alignment is not recommended as part of this study.
2. In the Final Environmental Impact Report for the Integrated Resources Plan, identify the Modified Alignment No. 1 and clarify the environmental impacts of this alignment in the Final EIR (this alignment is a minor variation of the alignments already described in the Draft EIR). The intent of this hybrid alternative is to provide flexibility for the project team to pursue design and construction of the project along an alignment that minimizes construction related impacts to the greatest extent possible.
3. To allow for additional public input and participation, the City Council will consider adopting a motion extending the public review period of the IRP DEIR. The new review period would have been extended to March 31, 2006.