CITY OF ROLLING HILLS ESTATES GENERAL PLAN UPDATE

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

SCH No. 2021050450



PREPARED FOR:



CITY OF ROLLING HILLS ESTATES COMMUNITY DEVELOPMENT DEPARTMENT 4045 PALOS VERDES DRIVE NORTH ROLLING HILLS ESTATES, CA 90274 **P**REPARED BY:

Michael Baker

JANUARY 2022

Content Pag				
1.0	Introduction1.0			
	1.1	Organization of the Final PEIR1	.0-1	
	1.2	Public Review Process1	.0-1	
	1.3	Overview of the Project1.	.0 - 2	
		1.3.1 Project Summary1.	.0 - 2	
		1.3.2 List of Discretionary Actions1.	.0 - 2	
2.0	Comr	ments and Responses to Comments2.	0-1	
	2.1	Introduction2	.0-1	
	2.2	Topical Response to Comments Received on the Draft PEIR2	.0-1	
	2.3	Comments Received on the Draft PEIR2	.0-5	
3.0	Revisi	ons to the Draft PEIR3.	0-1	

List of Figures

Figure 2.2-1	Wildfire History of the Palos Verdes Peninsula)-4
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1.0 INTRODUCTION

This Final Programmatic Environmental Impact Report (PEIR) was prepared in accordance with and in fulfillment of the California Environmental Quality Act (CEQA) and the CEQA Guidelines. In accordance with CEQA Guidelines Section 15089, the City of Rolling Hills Estates (City), as the lead agency, must prepare a Final EIR before adopting the Proposed General Plan Update (GPU). The purpose of this Final PEIR is to provide an opportunity for the lead agency to respond to comments provided by the public and agencies regarding the Draft PEIR for the proposed GPU. Pursuant to CEQA Guidelines Section 15132, this Final PEIR includes a list of persons, organizations, and agencies commenting on the Draft PEIR; responses of the City to points raised in the review of the Draft PEIR; and revisions to the Draft PEIR.

The GPU provides an update for the current General Plan that addresses eight General Plan elements, seven of which are required by State law (i.e., circulation, conservation, housing, land use, noise, open space, and safety). In addition to these seven elements, the proposed GPU would establish a Sustainability Element.

This Final PEIR constitutes the second part of the PEIR for the Proposed Project and is intended to be a companion to the Draft PEIR. The Draft PEIR for the Proposed Project, which circulated for public review and comment from October 22, 2021, through December 6, 2021, constitutes the first part of the PEIR and is incorporated by reference and bound separately.

1.1 ORGANIZATION OF THE FINAL PEIR

This Final PEIR is organized in the following manner:

• Section 1.0 – Introduction

This section provides an introduction to the Final PEIR and identifies the contents of the Final PEIR. Also included in this section are the overview of the public review process that was completed for the Proposed Project and a summary of the Proposed Project.

• Section 2.0 – Comments and Responses to Comments

This section includes a comprehensive response to address multiple, similar comments that have been raised on the key topic of Wildfire Emergency Evaluation during the Draft PEIR public review period. This section also includes a list of the parties that commented on the Draft PEIR. This list is followed by the comment letters, which have been given a number, along with the individual comments within the letters bracketed and also assigned numbers. The Lead Agency's corresponding responses to these comments follow each letter.

• Section 3.0 – Revisions to the Draft PEIR

This section identifies revisions to the Draft PEIR to make clarifications and insignificant modifications following public comment.

1.2 PUBLIC REVIEW PROCESS

Pursuant to the requirements of CEQA, the environmental review process for the PEIR commenced with solicitation of comments from identified responsible and trustee agencies, as well as interested parties and members of the public, on the scope of the Draft PEIR through a Notice of

Preparation (NOP) process. In accordance with CEQA Guidelines Section 15082, the City issued an NOP for the Proposed GPU on May 21, 2021, for a review period through June 21, 2021. The NOP was circulated to the public, local, state, and federal agencies, and other interested parties to solicit comments on the scope of the Draft PEIR. A public scoping meeting, held virtually due to the COVID-19 pandemic, was conducted on June 3, 2021 to further solicit input from interested agencies, organizations, and individuals on the scope and content of the Draft PEIR.

Consistent with the requirements of CEQA Guidelines Sections 15087 and 15105, the Draft PEIR was circulated for a 46-day public comment period commencing on October 22, 2021 and ending on December 6, 2021. The City published a Notice of Availability of the Draft PEIR (NOA) in the Daily Breeze newspaper and distributed the NOA to interested agencies, organizations, and persons. In addition, the City submitted the Draft PEIR, along with the NOA and a Notice of Completion (NOC), to the State Clearinghouse, Office of Planning and Research (OPR). A Special Joint City Council and Planning Commission meeting was held on November 9, 2021 in an online format using Zoom to share information regarding the proposed GPU and the impact determination presented in the Draft PEIR and to receive public comments on the Draft PEIR. Following the Draft PEIR public comment period, this Final PEIR has been prepared and includes the responses to the comments raised regarding the Draft PEIR.

1.3 OVERVIEW OF THE PROJECT

1.3.1 PROJECT SUMMARY

The Rolling Hills Estates General Plan is a guidance document that describes the City's vision as a livable community with excellent services, a strong identity, healthy business opportunities, and a strong and efficient government. Future land use, circulation, housing, conservation, and other decisions in the City are guided by goals and policies set forth in the General Plan. The General Plan is a State-required legal document (Government Code Section 65300) that provides guidance to decision-makers regarding the conservation of resources and the future physical form and character of development in the City. It is the jurisdiction's official statement regarding the extent and types of development of land and infrastructure that will achieve the community's physical, economic, social, and environmental goals. The General Plan expresses the City's goals and articulates the City's intentions with respect to the rights and expectations of the general public, property owners, community interest groups, prospective investors, and business interests. Although the General Plan consists of individual sections, or elements, that address a specific area of concern, it also embodies a comprehensive and integrated planning approach.

In 2017, the City initiated a multi-year process to update the City's General Plan, referred to as the proposed GPU. If adopted, the proposed GPU would be the overarching policy document that guides land use, housing, transportation, infrastructure, community design, and other policy decisions through the anticipated plan horizon year of 2040. The proposed GPU would serve as the City's "blueprint" for future development, providing the policy guidance for achieving the community's vision.

The City's current General Plan dates back to 1992 and is in need of an update as new opportunities, challenges, and approaches have emerged in recent years. The proposed GPU would address emerging issues and community priorities, ensure compliance with State law, and revise implementing policy frameworks to focus on present and future goals and policy objectives. The proposed GPU would also incorporate new and updated assumptions, data, and analysis, as well as establish a new vision and blueprint for development and investment through 2040.

The proposed GPU would address eight General Plan elements, seven of which are required by State law (i.e., circulation, conservation, housing, land use, noise, open space, and safety). In addition to these seven elements, the proposed GPU would establish a Sustainability Element.

Rolling Hills Estates is essentially a built-out City with only two vacant parcels (other than those designated for open space), a low-density residential parcel and a commercial use parcel. The residential neighborhoods, as well as the parks and recreation areas, in the City are well-established and are not expected to change during the timeline of this proposed GPU. The primary changes included in the proposed GPU include:

- Apply a new Commercial District Mixed-Use Overlay to the City's Commercial District that would allow for a base residential density of 30 dwelling units per acre with an opportunity for a 50-percent density bonus for projects that provide certain community benefits
- Extend the existing Mixed-Use Overlay to the properties designated for Commercial Office
- Redesignate the property on the northeastern corner of Highridge Road and Armaga Spring Road from Commercial Office to Neighborhood Commercial
- Redesignate the Seahorse Riding Club parcel along Crenshaw Boulevard from Commercial Recreation to Neighborhood Commercial
- Revise allowable land uses in the Institutional designation to include affordable residential uses at 1 to 2 units per acre concentrated in small portions of Institutional properties
- Adjust the land use designations of several parcels to match their current uses
- Envision changing Silver Spur Road from a four-lane street to a two-lane street, narrowing it to a "main street" scale street, with angled parking (instead of parallel parking), buffered bike lanes, and other amenities
- Envision removing Bart Earle Way (replaced by a rear entry drive aisle to access parking) and providing the roadway space for development as an addition to existing parcels along the north side of Bart Earle Way

Envision reconnecting Deep Valley Drive if and when redevelopment of the Promenade Mall site occurs

For more details about the proposed GPU, see the comprehensive Project Description in Chapter 2 of the Draft PEIR.

1.3.2 LIST OF DISCRETIONARY ACTIONS

The City, as lead agency pursuant to CEQA Guidelines Section 15367, has the principal responsibility for approving the proposed GPU. There are no responsible or trustee agencies with any approval authority for the Proposed Project. In order to adopt the proposed GPU, the City would have to take the following actions:

- Certification of the Final PEIR
- Amend the General Plan and adopt the GPU

Additionally, while not required for approval of the proposed GPU, but associated with the actions to be taken as part of this Project, the City's Zoning Code would need to be updated for consistency with the proposed GPU and to implement certain components of the proposed GPU.

2.0 COMMENTS AND RESPONSES TO COMMENTS

2.1 INTRODUCTION

Sections 21091(d) and 21092.5 of the Public Resources Code (PRC) and CEQA Guidelines Section 15088 govern the lead agency's responses to comments on a Draft EIR. CEQA Guidelines Section 15088(a) states that "[T]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments." In accordance with these requirements, this section of the Final PEIR provides the responses prepared by the City to each of the written comments received regarding the Draft PEIR.

2.2 TOPICAL RESPONSE TO COMMENTS RECEIVED ON THE DRAFT PEIR

TOPICAL RESPONSE NO. 1 – WILDFIRE EMERGENCY EVACUATION

During the Special Joint City Council and Planning Commission meeting held on November 9, 2021, members of the City Council and Planning Commission expressed concerns for emergency evacuation during a wildfire scenario. Section 4.22 of the Draft PEIR focuses on potential wildfire-related impacts. In particular, the analysis of Threshold 4.22(a) specifically addresses emergency evacuation. This topical response provides additional detail and clarification to explain why the proposed GPU would not result in significant environmental impacts related to wildfire related emergency evacuation.

When assessing the potential for the future wildfire emergency evacuation needs of the City, it is important to consider the history of wildfires and wildfire-related evacuations on the Palos Verdes Peninsula. In response to the City's request, the Los Angeles County Fire Department (LACoFD) provided information on the wildfire history of the Palos Verdes Peninsula, which is shown herein as Figure 2.2-1. As identified in this figure, most of the notable wildfires that have occurred on the Peninsula were in the Portuguese Bend area. The most destructive fire was in 1973, when 22 homes were burned in a 925-acre fire. No serious injuries occurred. In addition to the 1973 fire, the 2009 PV Fire is notable because it is the most recent large-scale fire on the Peninsula, and it is known that 1,200 residents were evacuated. The PV Fire burned 234 acres; no homes were lost, and there were no reported injuries.

If this historical pattern of wildfires on the Palos Verdes Peninsula continues into the future, the scale of wildfire evacuation needs for the Peninsula would be on the order of 1,000 to 2,000 residents. While climate change is generally expected to increase the frequency and severity of wildfires in California,¹ other factors would at least partially offset such increases on the Palos Verdes Peninsula. For example, as undeveloped areas of the Peninsula are built out, the areas susceptible to wildfires and wildfire fuel would be reduced. In addition, all new development would be required to be built to the latest Fire Code requirements, and development located in close proximity to dense vegetation or mature stands of trees would require a Fuel Modification Plan and installation and irrigation of non-flammable landscaping materials, as well as use of ignition-resistant building materials and roofing, consistent with LACoFD standards. As such, it is reasonable to assume

¹ California, State of. California's Fourth Climate Change Assessment, Statewide Summary Report (Report #: SUM-CCCA4-2018-013). Published: January 16, 2019

that any future wildfire evacuation needs would be generally of the same scale as those of past wildfire events on the Peninsula. There is not a plausible wildfire scenario on the Palos Verdes Peninsula in which there would be a need for mass evacuation in an uncontrolled manner—such a scenario is remote and speculative. Rather, in the event of a wildfire, emergency responders would assess the situation and evacuate targeted portions of the community (if any) in a controlled manner.

With regard to emergency evacuation, there are multiple egress routes from the Rolling Hills Estates Planning Area, including:

- Palos Verdes Drive North to the west, with one lane in each direction and a current average daily traffic (ADT) volume of 18,688 vehicles west of Hidden Valley Road;
- Hawthorne Boulevard to the north, with two lanes in each direction and a current ADT of 30,300 vehicles south of Rolling Hills Road;
- Crenshaw Boulevard to the north, with three lanes in each direction and a current ADT of 26,688 vehicles north of Palos Verdes Drive North;
- Palos Verdes Drive East/Narbonne Ave to the north, with one lane in each direction and a current ADT of 10,758 vehicles south of Club View Lane; and
- Palos Verdes Drive North to the east, with two lanes in each direction and a current ADT of 33,727 vehicles west of Strawberry Lane.

In total, these roadways provide five evacuations options with a total of 18 through lanes that currently carry more than 120,000 vehicles daily. While all lanes could be available to emergency responders for evacuation, if only the outbound lanes are considered, the existing routes provide nine outbound through lanes that currently carry approximately 60,000 vehicles per day. Comparing that total roadway volume to the potential evacuation need identified above, even in a 2,000-resident evacuation event in which all residents drive their own vehicle, the existing roadway volumes would provide adequate capacity and multiple options for emergency evacuation. While traffic congestion occurs on some of these roadways during normal peak travel hours, normal traffic patterns would be disrupted during a wildfire evacuation event and traffic would be directed and controlled by emergency responders.

As noted in the Draft PEIR (p. 4.22-12), in the event of a future wildfire event that requires evacuation, emergency responders would assess local conditions in an ongoing manner, to identify locations and severity of threats to homes and businesses within the Planning Area and any other land uses that place people in the path of a wildfire. Based on those assessments, decisions would be made on where to focus fire response efforts, initiate calls for back-up assistance and assignment of additional resources, and when/where to implement emergency evacuations if no other options are deemed viable. This could include partial or total evacuation of the Planning Area, sheltering in place for some parts of the community, possibly moving people to the critical facilities identified in the Hazard Mitigation Plan, or combinations of all of these approaches. Actions by emergency responders to direct evacuation efforts would be based, in part, on indications of where congestion is occurring so that evacuees could be directed in a different direction. Given the development patterns of the City and surrounding area, virtually the entire Planning Area is within several miles of urbanized areas that are not vulnerable to wildfire (i.e., during a wildfire emergency evacuation event there is a short distance to safety).

With regard to the proposed GPU, the majority of development is anticipated to occur in the Peninsula Center Commercial District, which is an entirely developed area with a lower susceptibility to wildfire than the rest of the Planning Area. While there are vegetated hillsides to the north and south of this Commercial District, such areas are not connected to larger tracts of vegetated land, and, thus, if fires did occur on these hillsides, they would be expected to be limited to localized brushfires. Given the developed condition of the Commercial District, it is unlikely that any wildfire evacuation orders would include future residences within the Commercial District.

The Draft PEIR concluded that the proposed GPU would not cause any significant impacts related to emergency response and emergency evacuation planning. The LACoFD reviewed the Draft PEIR and did not provide any comments or express any concerns regarding emergency evacuation. Similarly, the California Office of Emergency Services was consulted throughout the GPU process and reviewed the draft Safety Element and did not express any concerns for emergency evacuation.

Finally, while not identified as a significant environmental impact, Policy 7.5.4 of the Safety Element expresses the City's policy to develop and maintain an evacuation plan. Implementation Measure 7.5.4.2 expresses the City's intent to work with Los Angeles County and neighboring jurisdictions to catalog emergency evacuation routes. To that end, while the City relies on contracted public safety experts (Los Angeles County Sheriff's and Fire Departments) for evacuation planning in the event of a major emergency or disaster, the Peninsula cities are currently collaboratively researching opportunities for evacuation planning in the region.

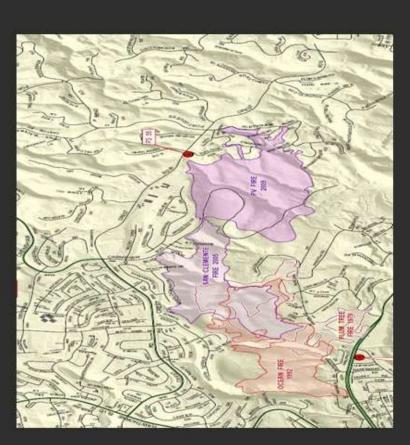
FIRE HISTORY PALOS VERDES PENINSULA

June 24, 1973 14:30

- Cinch Ring, Wrangler, Running Brand, Portuguese Bend

Ocean Fire 1992 **194** acres Crenshaw Fire 1993 **928** acres San Clemente Fire 2005 **179** acres PV Fire 2009 **234** acres

No homes lost, no injuries to residents



Source: Los Angeles County Fire Department, 2021.

FIGURE 2.2-1

Wildfire History of the Palos Verdes Peninsula

2.3 COMMENTS RECEIVED ON THE DRAFT PEIR

This section includes all written responses received on the Draft PEIR and the City's responses to each comment. Comment letters and specific comments are given numbers for reference purposes.

The following is a list of agencies that submitted comments on the Draft PEIR during the public review period.

Number Reference	Commenting Agency	Date of Comment Letter	Page Number
1	County of Los Angeles Fire Department	November 15, 2021	2.0-6
2	Los Angeles County Sanitation Districts	November 30, 2021	2.0-10
3	Metropolitan Water District of Southern California	December 3, 2021	2.0-14

COMMENT LETTER NO. 1

FIRE CALEDOMA

DARYL L. OSBY FIRE CHIEF FORESTER & FIRE WARDEN

COUNTY OF LOS ANGELES FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE LOS ANGELES, CALIFORNIA 90063-3294 (323) 881-2401 www.fire.lacounty.gov

"Proud Protectors of Life, Property, and the Environment"

BOARD OF SUPERVISORS

HILDA L SOLIS FIRST DISTRICT

HOLLY J MITCHELL SECOND DISTRICT

SHEILA KUEHL THIRD DISTRICT

JANICE HAHN FOURTH DISTRICT

KATHRYN BARGER FIFTH DISTRICT

November 15, 2021

Jeannie Naughton, Planning Manager City of Rolling Hills Planning Department 4045 Palos Verdes Drive North Rolling Hills Estates, CA 90274

Dear Ms. Naughton:

NOTICE OF AVAILABILITY DRAFT PROGRAM/ENVIRONMENTAL IMPACT REPORT, "ROLLING HILLS ESTATES GENERAL PLAN UPDATE," EXPRESSES THE CITY'S GOALS AND ARTICULATES THE CITY'S INTENTIONS WITH RESPECT TO THE RIGHTS AND EXPECTATIONS OF THE GENERAL PUBLIC, PROPERTY OWNERS, COMMUNITY INTEREST GROUPS, PROSPECTIVE INVESTORS, AND BUSINESS INTERESTS, ROLLING HILLS, FFER 2021011092

The Notice of Availability Draft Program/Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

We have no comments.

For any questions regarding this response, please contact Kien Chin, Planning Analyst, at (323) 881-2404 or Kien.Chin@fire.lacounty.gov.



1-1

Jeannie Naughton, Planning Manager November 15, 2021 Page 2

LAND DEVELOPMENT UNIT:

This project does not propose construction of structures or any other improvements at this time. Therefore, until actual construction is proposed the County of Los Angeles Fire Department's Land Development Unit has no comments.

1-3

1-4

All future development shall comply with all applicable code and ordinance requirements for construction, access, water main, fire flows, and fire hydrants.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's, Inspector Nancy Rodeheffer at (323) 890-4243.

FORESTRY DIVISION - OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage, or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Nicholas Alegria at (818) 890-5719.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions. 1-5

If you have any additional questions, please contact this office at (323) 890-4330.

Jeannie Naughton, Planning Manager November 15, 2021 Page 3

Very truly yours,

Rully 1

RONALD M. DURBIN, CHIEF, FORESTRY DIVISION PREVENTION SERVICES BUREAU

RMD:ac

COMMENT LETTER NO. 1

Ronald M. Durbin, Chief Forestry Division, Prevention Services Bureau County of Los Angeles Fire Department 1320 North Eastern Avenue Los Angeles, CA 90063-3294

Response to Comment No. 1-1

This comment acknowledges receipt of the Draft PEIR for the General Plan Update and introduces specific comments from the different divisions within the County of Los Angeles Fire Department (LACoFD). No response is necessary.

Response to Comment No. 1-2

This comment acknowledges that the Planning Division of LACoFD has received the Draft PEIR and has no comments. No response is necessary.

Response to Comment No. 1-3

This comment identifies the requirements for any future developments but identifies that the Land Development Unit has no specific comments on the GPU or the PEIR. No response is necessary.

Response to Comment No. 1-4

This comment identifies the statutory responsibilities of LACoFD's Forestry Division, including erosion control, which is addressed in the responses to Initial Study Checklist Question VII.B on page 24 of the Initial Study and Initial Study Checklist Questions X.a and X.c on page 30 of the Initial Study; watershed management, which is addressed in response to Initial Study Checklist Question X.a on page 30 of the Initial Study; rare and endangered species and vegetation, which are addressed in on page 4.3-15 of the Draft PEIR; fuel modification for Very High Fire Hazard Severity Zones (VHFHSZ), which is addressed on page 4.22-11 of the Draft PEIR; and oak trees, which are addressed on page 4.4-15 of the Draft PEIR; and oak trees, which are addressed on page 4.3-21 of the Draft PEIR.

It should further be noted that the Los Angeles County Oak Tree Ordinance, identified in this comment, only applies to unincorporated areas of Los Angeles County that are discussed in the GPU and does not apply to areas within the City.

Response to Comment No. 1-5

This comment acknowledges that LACoFD has no comments or requirements for the Project related to hazardous materials. No response is necessary.

COMMENT LETTER NO. 2



Robert C. Ferrante Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400 Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998 (562) 699-7411 • www.lacsd.org

November 30, 2021

Ref. DOC 6350730

Ms. Jeannie Naughton, AICP, Planning Manager City of Rolling Hills Estates 4045 Palos Verdes Drive North Rolling Hills Estates, CA 90274

Dear Ms. Naughton:

DPEIR Response to City of Rolling Hills Estates General Plan Update

2 8	The Los Angeles County Sanitation Districts (Districts) received a Notice of Availability of a Draft Program	
	ironmental Impact Report (DPEIR) for the subject project on October 22, 2021. The City of Rolling Hills tes (City) is located within the jurisdictional boundaries of South Bay City Sanitation District and District No.	2-1
5. H	Previous comments submitted by the Districts to your agency in correspondence dated June 17, 2021 (copy losed) still apply to the subject project with the following updated information:	[
1.	The wastewater generated by the City will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 million gallons per day (mgd) and currently processes an average flow of 249.8 mgd.	2-2
2	The Districts should review individual developments within the City to determine whether sufficient trunk	2.3

All other information concerning Districts' facilities and sewerage service contained in the document is current. If you have any questions, please contact the undersigned at (562) 908-4288 extension 2743 or mandyhuffman@lacsd.org.

sewer capacity exists to serve each project and if Districts' facilities will be affected by the project.

Very truly yours,

Mandy Huffman

Mandy Huffman Environmental Planner Facilities Planning Department

MNH:mnh

Enclosure



Robert C. Ferrante Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400 Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998 (562) 699-7411 • www.lacsd.org

June 17, 2021

Ref. DOC 6180603

Ms. Jeannie Naughton, AICP Planning Manager City of Rolling Hills Estates 4045 Palos Verdes Drive North Rolling Hills Estates, CA 90274

Dear Ms. Naughton:

NOP Response for City of Rolling Hills General Plan Update

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on May 19, 2021. The City of Rolling Hills Estates is located within the jurisdictional boundaries of the South Bay Cities Sanitation District and District No. 5. We offer the following comments regarding sewerage service:

- 1. The Districts own, operate, and maintain the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the City of Rolling Hills Estates (City) except to state that presently no deficiencies exist in Districts' facilities that serve the City. For information on deficiencies in the City sewerage system, please contact the City Department of Public Works and/or the Los Angeles County Department of Public Works.
- The wastewater generated by the City is treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 million gallons per day (mgd) and currently processes an average flow of 259.6 mgd.
- In order to estimate the volume of wastewater a project will generate, go to <u>www.lacsd.org</u>, under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the <u>Table 1</u>, <u>Loadings for Each Class of Land Use</u> link for a copy of the Districts' average wastewater generation factors.
- 4. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is used by the Districts to upgrade or expand the Sewerage System. Payment of a connection fee may be required before a project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to <u>www.lacsd.org</u>, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

2-4

Ms. Jeannie Naughton

5.

2

January 2022

City of Rolling Hills Estates

In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717 or at araza@lacsd.org.

Very truly yours,

adresa Jage

Adriana Raza Real Property Agent Facilities Planning Department

AR:ar

June 17, 2021

2-4 (con.)

COMMENT LETTER NO. 2

Mandy Huffman, Environmental Planner Facilities Planning Department Los Angeles County Sanitation Districts 1955 Workman Mill Road P.O. Box 4998 Whittier, CA 90607-4998

Response to Comment No. 2-1

This comment acknowledges receipt of the Draft PEIR for the Project and introduces updates to the previous comments from the Sanitation Districts submitted in response to the Notice of Preparation.

Response to Comment No. 2-2

The comment provides information regarding the District's facilities, including the Joint Water Pollution Control Plant, which has a capacity of 400 million gallons per day (mgd) and currently processes 249.8 mgd. The text of the Draft PEIR on page 4.19-5 has been updated to reflect the change in current average processing of the Joint Water Pollution Control Plant. See amended text, below (Section 4.19, Utilities and Service Systems—Wastewater, page 4.19-5, third full paragraph from the top of the page) with additions noted with double underlined text (additions) and deletions noted with double strikethrough text (deletions).

Wastewater generated by existing uses in the Planning area is treated at the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson. The JWPCP has a capacity of 400 million galls per day (mgd) and currently processes an average flow of 259.6 249.8 mgd (approximately 140.4 150.2 mgd remaining capacity).

This change does not affect the impact analysis in the Draft PEIR.

Response to Comment No. 2-3

This comment provides guidance for future developments within the City regarding the sufficiency of trunk sewer capacity. The Sanitation Districts' request has been noted, and sewer capacity will be considered on a project-by-project basis.

Response to Comment No. 2-4

This comment was previously provided during the comment period for the Notice of Preparation. As such, all information provided by the Sanitation Districts in this comment letter were incorporated, where appropriate, into the Draft PEIR. Although the comment does not raise an issue regarding the content of the Draft PEIR, the resubmission of the Sanitation Districts' comments is noted for the administrative record and forwarded to the decision makers for consideration.

COMMENT LETTER NO. 3

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Office of the General Manager

December 3, 2021

Ms. Jeannie Naughton, Planning Manager Rolling Hills Estates Planning Department 4045 Palos Verdes Drive North Rolling Hills Estates, CA 90274

Dear Ms. Naughton:

Review of the Notice of Availability, Draft Program Environmental Impact Report, and Proposed General Plan Update for the City of Rolling Hills Estates

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Availability, Draft Program Environmental Impact Report (draft PEIR), and proposed General Plan Update for the City of Rolling Hills Estates (City). The General Plan Update is a guidance document that describes the City's vision as a livable community with excellent services, a strong identity, healthy business opportunities, and a strong and efficient government. The Project Area encompasses the city limits of Rolling Hills Estates and the City of Rolling Hills Estates is the CEQA Lead Agency. This letter contains Metropolitan's comments as a potentially affected public agency.

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies, serving approximately 19 million people in portions of six counties in Southern California, including Los Angeles County. Metropolitan's mission is to provide its 5,200 square mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way. Metropolitan owns and operates a treated water reservoir, and two treated water pipelines within the Project Area.

Metropolitan owns and operates the Palos Verdes Reservoir, located at the intersection of Palos Verdes Drive North and Palos Verdes Drive East, within the Project Area. The Palos Verdes Reservoir is a covered reservoir constructed in 1939 with a potable water storage capacity of 740-acre feet. Metropolitan completed a series of upgrades and repairs to the reservoir in 2019 including reservoir cover and liner replacement; underdrain system installation; removal and replace the existing emergency overflow spillway; sodium hypochlorite pump and piping replacement; replacement of the control panels and electrical updates for the chemical feed system; installation of a new pre-fabricated water quality laboratory; relocation of the blow-off

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THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA	
Ms. Jeannie Naughton, Planning Manager Page 2 December 3, 2021	
infrastructure, installation of associated piping, and installation of a sewer/groundwater disposal system.	Ĩ
Metropolitan's Palos Verdes Feeder is a 51-inch-inside-diameter pipeline. The Palos Verdes Feeder originates from a Metropolitan facility in the community of Eagle Rock in the City of Los Angeles and transports treated water to the Palos Verdes Reservoir in the City of Rolling Hills Estates. The Palos Verdes Feeder within the Project Area runs in a general north-south direction below Montecillo Drive and Encanto Drive.	
Metropolitan owns and operates the 78-inch-inside-diameter Second Lower Feeder Pipeline (SLF) within the Project Area. The SLF originates at Metropolitan's Robert B. Diemer Treatment Plant in the City of Yorba Linda and transports treated water to the Palos Verdes Reservoir. The SLF within the proposed project area is located under Palos Verdes Drive East in the public right-of-way.	3-2 (con.)
In January 2017, Metropolitan's Board of Directors certified a Final Programmatic Environmental Impact Report for the Prestressed Concrete Cylinder Pipe Rehabilitation Program (PCCP). The PCCP Rehabilitation Program is a comprehensive effort to manage Metropolitan's PCCP feeders. The scope of the program includes: aggressively inspecting and monitoring the condition of all PCCP lines; installing cathodic protection as a proactive and cost-effective measure to prevent corrosion; repairing individual distressed PCCP segments, as necessary; and rehabilitating five priority PCCP feeders in a planned, systematic fashion. The SLF is the first of the five feeders under the PCCP program to undergo repair, and construction for the relining of the SLF is currently underway in Los Angeles County. Inspection and repairs to the SLF under the PCCP Program will require coordination between Metropolitan and the City for work in and around Palos Verdes Reservoir and Palos Verdes Drive East.	
Metropolitan provides the following comments on the General Plan Update draft PEIR:	
 Page 2.0-6 defines Open Space as public parks and private land reserved for open spaces. Figure 2.3-1 and 2.5-1 of the draft PEIR depict the area of Palos Verdes Reservoir and an adjacent area across the street from the reservoir on Palos Verdes Drive East that houses Metropolitan's SLF Weir Structure as having an Open Space land use designation. However, Page 2-11 of the draft General Plan Land Use Element section describes Palos Verdes Reservoir land use as utility. It should be noted that while portions of the Palos Verdes Reservoir property and SLF Weir Structure property are open areas, they also contain extensive amounts of subterranean pipelines and structures, surface access structures, and industrial scale chemical feed systems consistent with regional, industrial water conveyance and storage facilities consistent with a utility. 	3-3

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Ms. Jeannie Naughton, Planning Manager Page 3 December 3, 2021

- Page 4.3-12 describes Palos Verdes Reservoir as a lake and Figure 4.3-4 depicts the Palos Verdes Reservoir as a lake. The Palos Verdes Reservoir is a geomembrane-lined. potable water reservoir with a floating cover, and should not be classified as a lake or other natural water body. Additionally, page 5-11 of the draft General Plan Conservation 3-4 Element section (Figure 5-1 Surface Waters) depicts Palos Verdes Reservoir as a reservoir and being distinct from other ponds or lakes within the City. Metropolitan requests that the Program EIR classify the Palos Verdes Reservoir consistently with the draft General Plan Figure 5-1 as a reservoir, not as a lake. 3. Figure 4.8-1 depicts Palos Verdes Reservoir as part of an Open Space Recreational District and page 4.8-7 states that "an Open Space Recreational District is land devoted to the preservation of natural resources and outdoor recreation. Parks, open space areas, scenic corridors and habitats of wildlife species make up these lands and fulfill the requirements of California Government Code Section 65560 to 65570. Additionally, an 3-5 Open Space Recreational District is intended to protect and preserve these areas from urban development and to ensure that these natural resources are protected from destruction". The Palos Verdes Reservoir is an industrial water storage facility and does not serve a recreational purpose. The primary function of the reservoir and reservoir property is not considered by Metropolitan to be park space, open space area, a scenic corridor, or wildlife habitat. Metropolitan provides the following comments on the draft General Plan Update:
 - Page 2-11 of the Land Use Element section describes Palos Verdes Reservoir land use as utility. Metropolitan agrees with this description, but notes that this description contradicts figures and chapters within the Program EIR that and other sections within the draft General Plan that describe the reservoir as open space, a lake, or as recreational.
 - Page 5-11 of the Conservation Element section (Figure 5-1 Surface Waters) depicts Palos Verdes Reservoir as a reservoir and being distinct from other ponds or lakes within the City. This figure contradicts Figure 4.3-4 of the Program EIR which describes Palos Verdes Reservoir as a lake. Metropolitan requests that the Palos Verdes Reservoir be consistently described as a reservoir and not as a lake or pond.
 - 3. Page 5-19 of the Conservation Element section describes Palos Verdes Reservoir as a lake. This description is incorrect and inconsistent with the map on Page 5-11 (Figure 5-1 Surface Waters) which depicts Palos Verdes Reservoir as a reservoir, and as being distinct from other ponds or lakes within the City. Metropolitan requests that the Palos Verdes Reservoir be consistently described as a reservoir and not as a lake or pond.

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THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Ms. Jeannie Naughton, Planning Manager Page 4 December 3, 2021

4. Page 7-16 of the Safety Element section states that while Metropolitan owns and maintains the Palos Verdes Reservoir, the main inlet and outlet pipeline feeders are controlled by the Los Angeles Department of Water and Power (LADWP). This statement is incorrect. Metropolitan owns and operates the two pipelines that feed the Palos Verdes Reservoir, the Palos Verdes Feeder and Second Lower Feeder, and the reservoir outlet piping. However, Metropolitan has a service connection with LADWP within the Palos Verdes Reservoir Property.

Based on a review of the proposed Project, there is the potential to impact Metropolitan's Palos Verdes Reservoir and pipelines within the City. Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to its facilities in order to maintain and repair its system. In order to avoid potential conflicts with Metropolitan's facilities and rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Metropolitan will not permit procedures that could subject the pipeline to excessive vehicle, impact or vibratory loads. Any future design plans associated with this project should be submitted to the attention of Metropolitan's Substructures Team. Approval of the project should be contingent on Metropolitan's approval of design plans for portions of the proposed project that could impact its facilities.

Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-7663. To assist the applicant in preparing plans that are compatible with Metropolitan's facilities and easements, we have a link to the "Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way" at http://www.mwdh2o.com/PDF Doing Your Business/4.7.1 Guidelines development.pdf

Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

We appreciate the opportunity to provide input to your planning process, and we look forward to receiving future documentation and plans for this project. For further assistance, please contact Ms. Michelle Morrison at (213) 217-7906.

Very truly yours,

One Second by Sean Carlson A71 D500039140.0

Sean Carlson Team Manager, Environmental Planning Section

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COMMENT LETTER No. 3

Sean Carlson Team Manager Environmental Planning Division Metropolitan Water District of Southern California 700 North Alameda Street Los Angeles, CA 90012

Response to Comment No. 3-1

This comment acknowledges receipt of the Draft PEIR for the General Plan Update and introduces specific comments from the Metropolitan Water District of Southern California (Metropolitan) regarding water supplies and distribution, which are addressed in the subsequent responses. As noted in the Draft PEIR, Cal Water, which provides water service to the Planning Area, purchases imported water from the West Basin Municipal Water District (WBMWD), which is a member agency of Metropolitan. This comment also provides background information about Metropolitan's service area and general operations.

Response to Comment No. 3-2

This comment identifies water infrastructure within the Project area that is owned and operated by Metropolitan, such as the Palos Verdes Reservoir and two feeder pipelines. This comment also provides background information regarding recent infrastructure improvements made to Metropolitan assets, such as upgrades to the Palos Verdes Reservoir, and repairs to feeder pipelines that serve the Project Area. No response is necessary.

Response to Comment No. 3-3

As stated in the comment provided by Metropolitan, Figures 2.3-1 and 2.5-1 of the PEIR depict the Palos Verdes Reservoir and the adjacent weir structure associated with the feeder pipeline that runs within Palos Verdes Drive East with an Open Space General Plan land use designation. The comment notes that while portions of these Metropolitan properties are open areas, they contain extensive amounts of subterranean structures and infrastructure. There is not a land use designation in the existing or the proposed General Plan land use designation also provides open space for purposes beyond recreation, such as managed production of resources and protection of public health and safety, as discussed in Section 4.8.1.1 of the Draft PEIR. Therefore, the open space land use designation for these properties owned by Metropolitan. The comment is noted for the administrative record and forwarded to the decision makers for consideration.

Response to Comment No. 3-4

The comment states that **Figure 4.3-4** depicts the Palos Verdes Reservoir as a lake feature whereas **Figure 5-11** of the proposed General Plan Conservation Element depicts the Palos Verdes Reservoir as a reservoir. Metropolitan requests that the City update the PEIR to update page 4.3-12 of the Draft PEIR to state that the Palos Verdes Reservoir is a reservoir, distinct from other ponds and lakes within the City. The classification of surface water features discussed on p. 4.3-12 and Figure 4.3-4, within the Biological Resources section of the Draft PEIR, are based on classifications provided by the United States Fish and Wildlife Service (USFWS) through their National Wetlands Inventory. The text of the Draft PEIR that accompanies **Figure 4.3-4** has been updated to clarify

that while the USFWS classifies the Palos Verdes Reservoir as a lake, the reservoir is a utility that does not generate the biological or recreational value that a natural lake would provide. See amended text, below (Section 4.3, Biological Resources, page 4.3-12, fourth full paragraph from the top of the page) with additions noted with double underlined text <u>(additions)</u> and deletions noted with double strikethrough text (deletions).

Freshwater Pond

A freshwater pond is a body of standing water, either natural or artificial and is usually smaller than a lake. During extended periods of dry conditions, these ponds may temporarily dry up. As shown in Figure 4.3-4, freshwater ponds that vary in size are located north of the Palos Verdes Reservoir on the east side of the Planning Area. Additionally, the National Wetlands Inventory shows that a small pond is located in the South Coast Botanic Garden; however, this pond is man-made and is currently dry.

<u>Lake</u>

A lake is an area of variable size that is filled with water, localized in a basin that is surrounded by land and apart from any river or other outlet that serves to feed or drain the lake. As shown in **Figure 4.3-4**, there is only one <u>property classified as a</u> lake within the Planning Area, the Palos Verdes Reservoir, which is located at the southeastern corner of the intersection of Palos Verdes Drive North and Palos Verdes Drive East on the east side of the Planning Area. <u>While the Palos Verdes</u> <u>Reservoir is classified as a lake by the USFWS National Wetlands Inventory, the reservoir is a geomembrane-lined, potable water reservoir with a floating cover and does not provide the biological or recreational values that would be provided by a naturally occurring or manmade lake.</u>

<u>Riverine</u>

A riverine wetland feature is a large natural stream of water flowing in a channel to the sea, a lake, or another such stream. Within the Planning Area, riverine features are located at the bottom of canyons formed by the Planning Area's many ridgelines.

This change does not affect the impact analysis in the Draft PEIR.

Response to Comment No. 3-5

As noted in the response to Comment No. 3-4, the Palos Verdes Reservoir is not a naturallyoccurring or manmade lake and, therefore, does not provide the recreational or biological benefits of a lake. However, the Palos Verdes Reservoir is included within this Open Space/Recreation district because while the primary purpose of the reservoir is as a water storage facility, as stated by Metropolitan, it does provide secondary benefits associated with open space land uses, such as the aesthetic benefits associated with lack of vertical development that could obstruct views and the presence of mature vegetation surrounding the reservoir. As stated in response to Comment 3-3, above, the reservoir is most appropriately categorized as open space in the proposed General Plan, matching the existing General Plan designation of the reservoir property.

Response to Comment No. 3-6

The classification of the Palos Verdes Reservoir as a lake is addressed in the response to Comment 3-4, above. This comment is noted for the administrative record and forwarded to the decision makers for consideration.

Response to Comment No. 3-7

As stated, above, the text accompanying Figure 4.3-4 in the Draft PEIR (appearing on page 4.3-12) has been edited to clarify that while the classification of the Palos Verdes Reservoir as a lake is consistent with the USFWS's National Wetland Inventory classification of surface waters in the Planning Area, the reservoir is a potable water storage facility and does not generate the biological or recreational benefits of a natural or manmade lake. The comment is noted for the administrative record and forwarded to the decision makers for consideration.

Response to Comment No. 3-8

As stated, above, the text accompanying Figure 4.3-4 in the Draft PEIR (appearing on page 4.3-12) has been edited to clarify that the classification of the Palos Verdes Reservoir as a lake is consistent with the USFWS's National Wetland Inventory classification of surface waters in the Planning Area; however, the reservoir a potable water storage facility and does not generate the biological or recreational benefits of a natural or manmade lake. The relevant language in the proposed General Plan Conservation Element (page 5-19) has also been revised and now reads:

Lake. A lake is an area of variable size that is filled with water, localized in a basin that is surrounded by land and apart from any river or other outlet that serves to feed or drain the lake. There is only one lake located on the eastern portion of the Planning Area, the Palos Verdes Reservoir. The Palos Verdes Reservoir is located south of Palos Verdes Drive North and east of Palos Verdes Drive East. While the Palos Verdes Reservoir is classified as a lake by the USFWS National Wetlands Inventory, the reservoir is a geomembrane-lined, potable water reservoir with a floating cover and does not provide the biological or recreational values that would be provided by a naturally occurring or manmade lake.

Response to Comment No. 3-9

While not a comment on the Draft PEIR, page 7-16 of the proposed General Plan Safety Element has been updated to reflect the information provided by the commenter regarding ownership and operation of the inlet and outlet structures associated with the Palos Verdes Reservoir. The proposed General Plan Safety Element now reads:

The Metropolitan Water District of Southern California (MWD) owns and maintains the Palos Verdes Reservoir. It also owns and operates the two pipelines that feed the Palos Verdes Reservoir, the Palos Verdes Feeder and Second Lower Feeder, and the reservoir outlet piping. The MWD has a service connection with Los Angeles Department of Water and Power (LADWP) within the Palos Verdes Reservoir Property.

This change does not affect the impact analysis in the Draft PEIR.

Response to Comment No. 3-10

The comment states that in order to avoid potential conflicts with Metropolitan's facilities and rights-of-way, any design plans for any activity in the area of Metropolitan's pipelines or facilities must be submitted for Metropolitan's review and written approval. As stated in Section 4.18, Utilities and Service Systems – Water Supply of the Draft PEIR, the California Water Service Palos Verdes District 2020 Urban Water Management Plan (UWMP) states that, based on projections by Metropolitan and WBMWD, purchased water will be sufficient to serve all demand through 2045 under all hydrologic conditions. Similarly, recycled water supplies are expected to be available to meet recycled water demands under all hydrologic conditions. Therefore, the projected water supply amounts in the UWMP for years 2025 through 2045 equal the projected demand values. That said, available water supplies and the ability for infrastructure maintained by Metropolitan to meet the water supply demands of future project demand would be analyzed on a project-by-project basis, with Metropolitan reviewing design plans for projects that may impact Metropolitan-owned facilities.

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3.0 REVISIONS TO THE DRAFT PEIR

In response to comments from the public and other public agencies, the Final PEIR has incorporated changes subsequent to publication of the Draft PEIR, as shown below with additions noted with double underlined text (additions) and deletions noted with double strikethrough text (deletions).

A clarification to Section 4.3, Biological Resources, page 4.3-12, fourth full paragraph from the top of the page of the Draft PEIR has been made, as follows:

<u>Lake</u>

A lake is an area of variable size that is filled with water, localized in a basin that is surrounded by land and apart from any river or other outlet that serves to feed or drain the lake. As shown in **Figure 4.3-4**, there is only one <u>property classified as a</u> lake within the Planning Area, the Palos Verdes Reservoir, which is located at the southeastern corner of the intersection of Palos Verdes Drive North and Palos Verdes Drive East on the east side of the Planning Area. <u>While the Palos Verdes</u> Reservoir is classified as a lake by the USFWS National Wetlands Inventory, the reservoir is a geomembrane-lined, potable water reservoir with a floating cover and does not provide the biological or recreational values that would be provided by a naturally occurring or manmade lake.

An update to Section 4.19, Utilities and Service Systems—Wastewater, page 4.19-5, third full paragraph from the top of the page of the Draft PEIR has been made as follows:

Wastewater generated by existing uses in the Planning area is treated at the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson. The JWPCP has a capacity of 400 million galls per day (mgd) and currently processes an average flow of 259.6 <u>249.8</u> mgd (approximately 140.4 <u>150.2</u> mgd remaining capacity).

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