

**SCOPE**  
**Santa Clarita Organization for Planning and the Environment**  
TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY  
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY  
POST OFFICE BOX 1182, SANTA CLARITA, CA 91386



5-29-15

County of Los Angeles Department of Public Works  
Attn: Mr. Dale Sakamoto  
900 S. Fremont 11<sup>th</sup> Fl  
Alhambra, CA 91803

*Sent Via Email to dsakamoto@dpw.lacounty.gov*

Re: Comments on Notice of Preparation for Hauled Water EIR for New Residential Development

Mr. Dale Sakamoto:

We note that there is a discrepancy between the dates indicated on your Notice of Preparation and the comment period stated on your website as “The second NOP was released on May 4, 2015. There is a 30-day comment period on the second NOP, and a scoping meeting will be held on May 20, 2015, to take public comment on the scope and content of the draft EIR.” These comments are emailed to your office by 5 PM June 1<sup>st</sup>, 2015 to comply with the time line stated on your written notice and thus are timely filed. But we urge you to accept comments through June 4<sup>th</sup>, since that is the date stated on you website.

We request that we be provided with a copy of the DEIR when it is released.

**Position on Hauled Water for New Residential Units Policy**

We believe that it is important to state at the outset that we oppose approving new residential development based on hauled water as the source of water supply. Such a policy precludes good water management because review and availability would not be conducted by a water agency knowledgeable of local water resources. Small systems and haulers often encounter health and/or water quality issues which they are ill-equipped to identify and may not be financially capable of resolving. Any problems with or delays of deliveries could put human health and welfare in danger.

Additionally, such a policy encourages urban sprawl into wild land areas, increasing costs of wildfire protections that must be born by tax payers and requiring additional roads, maintenance which will also both increase costs to tax payers and cause additional impacts to wild life.

**Initial Study**

It is our understanding after reviewing your website on this matter that a new initial study was not conducted for the current NOP. Therefore, the following comments are made based on the Initial Study dated September 17, 2014.

We begin by stating that we generally concur with the findings of Initial Study and do concur with the finding that an EIR is required, and that there will be significant impacts to the environment.

However, we are unclear as to why the County found no potential impact to geology, especially to soils “incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.” We would surmise that such soils would be prevalent where sub-surface ground water does occur, those making it probably that lots unable to obtain well water may also be unlikely to support septic facilities or adequately manage waste water. While septic tanks may not affect water supply wells under a hauled water scenario, sewage that cannot be properly disposed underground is certainly an issue to wildlife or potentially other water bodies. Please address this in the DEIR.

We disagree with the finding that there is no significant impact under Hazardous Materials Section h) “Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?”

We believe the County and the DEIR must explore the potential for storage of such regularly used household hazardous materials as paint and other chemicals that may be flammable or toxic, and are found in dwellings in amounts large enough to cause the quick spread of fire or release of toxic chemicals that cannot be abated by a small amount of water on site in a hauled water situation.

We also believe the County must address the noise issue as a potential significant impact, since the whole residence itself would not be possible without the passage of a hauled water ordinance. This includes levels above the ambient noise level for generators, trucks, pumps or other mechanical devices that would be required for a site not immediately accessible to water and thus otherwise unbuildable.

#### **Additional DEIR Information required**

The DEIR should include a discussion of the financial burden of services to be provided in outlying areas and who will bare the costs of these services if this ordinance is approved. This analysis should include especially the cost of fire fighting, and emergency health services.

Page 3.10-4 of the Scoping memo states:

“On January 1, 2003, the Los Angeles County Department of Public Health, Environmental Health, Bureau of Environmental Protection Drinking Water Program issued an advisory based on the State Department of Public Health advisory entitled “POTABLE WATER AVAILABILITY REQUIREMENTS FOR RESIDENTIAL AND COMMERCIAL DEVELOPMENT.” The letter stated: “Hauled water does not provide the equivalent level of protection of public health or the consistent level of reliability as that permitted by a public water system or an approved on-site water source. Therefore, hauled water does not satisfy the requirements for potable water for new residential or commercial construction. For new residential and commercial construction, only public water systems or approved private water wells satisfy the requirements for potable water.”

The DEIR should state what circumstances have changed that would now enable the Dept of Health Services to provide a new or different viewpoint on this matter. If the Dept. of Health Services has not changed its opinion in this matter, the County should provide information as to why it feels it can proceed with this initiative when it cannot provide public health protection.

While page 3.14-2 seems to indicate that fire protection would be granted with adequate stored supply to defend the property, we note that recent efforts to protect rural structures from fire have resulted in major expense to the County and State, and have even caused the loss of life of both fireman and individuals. The County must therefore carefully analyze its ability to protect such permitted housing, given the increased wildfire potential of climate change. The DEIR should evaluate this impact both from the potential of increased wildfires and the financial cost of these services.

Thank you for the opportunity to comment on this proposal in its initial stage. We look forward to reviewing the DEIR.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynne Plambeck".

Lynne Plambeck  
President