

**Comments Re: DONALD C. TILLMAN WATER RECLAMATION PLANT
Lease Renewal**

The Sepulveda basin wildlife area steering committee would fully support the DONALD C. TILLMAN WATER RECLAMATION PLANT Lease Renewal if it were simply a lease renewal. In fact it appears to be an expanded footprint of the plant which could impact Haskell creek, wildlife and the endangered Least Bells vireo.

The expansion for the future treatment of water to potable in the advanced water purification facility (the AWPf) expands into Haskell Creek in the proposed action. The EA indicates that the footprint of the AWPf includes a section of Haskell Creek in figure 2.1. It further specifies that this is upstream of habitat where the Least Bells vireo was observed in 2017. Therefore we urge you to avoid the habitat of the Least Bells vireo in your design of any expansion of the water treatment plant.

While we are in full support of most water conservation measures, and the water treatment is an important source of water for the wildlife lake, this plan requires closer scrutiny and amendments to avoid the habitat of the Least Bells vireo at a minimum to meet the requirements of this committee to support this EA. While the EA summary states that the LBV have been observed 1000 feet away, it does not indicate how construction upstream of the habitat does or does not have an effect on the section of the river where they were observed. When an endangered species habitat is potentially impacted, avoidance is the best practice. The mitigation measures stated on page 3-4 do not assure that no impact to their habitat will occur, as they require frequent monitoring, pauses in work and these may not be enough of an avoidance. This potential for impact on wildlife is an indication that a full EIR for the expansion of the plant may be warranted. Other species of protected status which are known to be present in the Sepulveda basin were not mentioned in the EA. These species include Coopers hawk and Southwestern Willow flycatcher. Since the bird survey does not reflect all the birds of the Sepulveda basin, we will attach a more complete survey conducted by Kris Ohlenkamp.

We would also request a 30 to 90 day extension of the comment period. Rather than ending on November 1, it would then end on December 1, or January 28th respectively. If the extension is granted, we will revise our comments further.

Furthermore we request a further outreach to the community at large who may be affected by the construction phase of this project.

We would request that wetland delineation be conducted for the Haskell creek portion as the EA indicates there is the potential that this area could be delineated wetlands, but no such study has been conducted for Haskell Creek.

We agree with your effort to avoid the offsite location alternative, due to required vehicle trips, is counterproductive, to a livable planet.

Some questions I would like answered by a biologist or by Fish and Game:

The Tillman treatment plant EA appears to impact Haskell Creek and Least Bells vireo. Would a smaller footprint of the AWPf (advanced water purification facility) completely eliminate the threat? If it was 3 stories and avoided the creek? Is the facility noisy during construction? During operation? Is noise a problem for the Vireo?

When the plant is operational could the noise of the plant and the changes in the creek effect the habitat of the Vireo that was observed in the bird survey of 2017?

Other questions have been: Will native plants be utilized in the replanting of the taller berm?

We look forward to hearing from you regarding a smaller footprint that completely avoids impact on endangered species and other migratory birds and wildlife. We would also appreciate the effort to avoid removal of mature trees. Mitigation of tree removal should be at least a 5 to 1 tree replacement. As with wildlife, avoidance of harm is the best practice.

We applaud your efforts to continue to treat water for secondary use like irrigation and ground water recharge and we hope there is a solution to the impacts on the creek, the wetlands and the wildlife.

Please feel free to contact us at our website or me, the current chair at my email sfvcsepbasin@gmail.com. You can also call me at 818 349 8889.

Sincerely,

Theresa Brady

Chair

Sepulveda Basin Wildlife Areas Steering Committee