COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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June 10, 2004

IN REPLY PLEASE
REFER TO FILE: WM-5

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Dear Supervisors:

SUN VALLEY WATERSHED MANAGEMENT PLAN
AND PROGRAM ENVIRONMENTAL IMPACT REPORT
AUTHORITY TO PROCEED
SUPERVISORIAL DISTRICT 3
3 VOTES

IT IS RECOMMENDED THAT YOUR BOARD ACTING AS THE GOVERNING BODY OF THE LOS ANGELES COUNTY FLOOD CONTROL DISTRICT:

1. Consider the proposed Final Program Environmental Impact Report (PEIR) for the Sun Valley Watershed Project, including the comments received and responses thereto; and certify that, pursuant to State California Environmental Quality Act (CEQA) Guidelines § 15090: (1) the PEIR reflects the independent judgment and analysis of the County; (2) the PEIR has been completed in compliance with CEQA; and (3) the PEIR was presented to your Board, and your Board has reviewed and considered the information contained therein in its decision-making process prior to approving the project.

2. Adopt the Watershed Management Plan (WMP) and all of its components for the Sun Valley Watershed Project to solve the local flooding problem by retaining stormwater runoff from the watershed; increasing water conservation, recreational opportunities, and wildlife habitat; and reducing stormwater pollution in the Sun Valley area of the City of Los Angeles.

3. Adopt the enclosed Environmental Findings of Fact and Statement of Overriding Consideration for the Sun Valley Watershed Project.

4. Adopt the Mitigation Monitoring and Reporting Program to ensure compliance with the Sun Valley Watershed Project and conditions adopted to mitigate or avoid significant effects on the environment.

5. Authorize the District to submit a request to the County Clerk for payment of the Department of Fish and Game filing fee of $850 required by Public Resources Code § 21089 to be paid concurrent with the filing of the Notice of Determination.

6. Authorize the District to carry out the implementation of the components of the WMP.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

The Sun Valley Watershed area is approximately 4.4 square miles in the Sun Valley community of the City of Los Angeles. This area presents the last major flooding problem within the County. There are no storm drains that serve the watershed area to address the flooding issues that are encountered by the community even in the lightest of rainfall events.

The District has been working with a group of stakeholders in this watershed area since November 1998 to provide a multipurpose solution to the flooding problem. The group has over 65 stakeholders comprised of Federal, State, and local agencies, and nonprofit and community groups. The group has been in an advisory role for the development of the WMP. The District and Supervisorial District 3 held several town hall meetings to discuss the WMP and the various components within the WMP. The community is very supportive of this WMP and would like to see it implemented soon.

The purpose of the WMP is develop a plan that will solve the local flooding problem by retaining as much stormwater runoff from the watershed as possible, increasing water conservation recreational opportunities and wildlife habitat, and reducing stormwater pollution in the Sun Valley area of the City of Los Angeles. This is a new approach towards solving a flooding problem in a highly urban environment.

The WMP is comprised of several component projects that would benefit Southern California by capturing the stormwater and retaining it in the watershed, and thereby recharge the local groundwater supplies; provide opportunities to increase recreational facilities in areas that are underserved and provide enhancement of water quality and areas that could support wildlife habitat.

The WMP includes 18 components: the Cal Mat Gravel Pit, New Park on Wentworth, Onsite Best Management Practices, Parking Lot on Sherman Way, Power Line Easements, Roscoe Elementary School, Sheldon Pit, and Tujunga Wash Diversion, Stonehurst Elementary School, Stonehurst Park, Storm Drains, Strathern Pit, Street Storage, Sun Valley Middle School, Tree Planting and Mulching, Tuxford Green, City of Los Angeles Department of Water and Power Steam Plant, and Vulcan Gravel Processing Plant. Implementation of these components is expected to occur over ten years or as funding becomes available. Implementation of each of the components provides multiuse benefits to the community.

Implementation of Strategic Plan Goals

This action is consistent with the County's Strategic Plan Goal of Service Excellence. By adopting the WMP and approving the PEIR, the District would be able to start implementing the component projects, which will provide for a better quality of life for the citizens of the County through the reduction of flooding and its related impacts, and through the reduction of pollutants in stormwater runoff.

FISCAL IMPACT/FINANCING

Funding for the Department of Fish and Game filing fee is available in the Fiscal Year 2003-04 Flood Control District Fund.

Funding each component project will be handled separately and provided for in future Flood Control District Budgets. The District will return to your Board for approval of construction contracts that will be advertised for each of the components in the future. Public Works will also work with others to obtain grants and other sources of funds towards implementation of the component projects.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

Under CEQA, any lead agency preparing a PEIR must provide a public notice within a reasonable period of time prior to certification of the Environmental Impact Report. To comply with this requirement, a Public Notice pursuant to § 21092 of the Public Resources Code was published in the *San Fernando Valley Sun* on October 23, 2003, *Los Angeles Times – San Fernando Valley Edition* on October 24, 2003, and *El Economico* on October 31, 2003. Copies of the Draft PEIR and the WMP were also available for review at the Sun Valley, Van Nuys, Panorama City, North Hollywood Regional, Northwest, Sunland-Tujunga, Pacoima, Burbank Central, City of Los Angeles Central, and San Fernando Branch Libraries and on the

website at www.sunvalleywatershed.org. Copies were also sent to the State Clearinghouse. Notices regarding the availability of the PEIR and the WMP were also mailed to approximately 2,400 residents and businesses in the vicinity of the project components.

The public review period for the PEIR and the WMP ended on December 8, 2003. Comments were received from the U.S. Fish and Wildlife Service; CALTRANS; the California Departments of Fish and Game, Health Services, and Water Resources; Division of Safety of Dams; the Los Angeles Regional Water Quality Control Board; the ULARA Watermaster; the South Coast Air Quality Management District; SCAG; the Southern California Regional Rail Authority; the City of Los Angeles' Departments of Water and Power, Environmental Affairs, and Public Works; LAUSD; TreePeople; Targhee, Inc.; and the Law Offices of John S. Peterson. Written responses to comments were provided as required by State CEQA Guidelines § 21092.5. Responses to comments are included in Appendix H of the PEIR.

ENVIRONMENTAL DOCUMENTATION

CEQA requires public agency decision makers to document and consider the environmental implication of their action. Public Works, as the division of the County responsible for preparing the PEIR on behalf of the District, issued a Notice of Preparation for the Sun Valley Watershed Project in November 2002 and circulated it for a period of 30 days pursuant to State CEQA Guidelines Sections 15082[a], 15103, and 15375. The Notice of Preparation was accompanied by an Initial Environmental Study, which found that project impacts related to the following environmental topics were less than significant: aesthetics, agricultural resources, land use and planning, and population and housing.

Thirteen written statements were received by Public Works in response to the Notice of Preparation. Additionally, a public scoping meeting for the project was held at the Sun Valley Middle School on November 20, 2002. Oral comments and written comment cards were received at the meeting.

A Draft PEIR was completed and released for public review on October 24, 2003, and Public Works initiated a 45-day public comment period by filing a Notice of Completion and a Notice of Availability with the State Office of Planning and Research. The public review and comment period lasted for 45 days from October 24 through December 8, 2003. In addition, Public Works held a public meeting on the Draft PEIR on October 29, 2003, at Sun Valley Middle School. Comments were received in English and Spanish (with a simultaneous interpreter) during the public meeting.

During the official public review period for the Draft PEIR, Public Works received written comments from 17 public agencies and organizations, all of which Public Works responded to in the Final PEIR.

Public Works prepared the Final PEIR, and pursuant to Public Resources Code Section 21092.5, also provided copies of the responses to comments and the Final PEIR to all commenting agencies.

The PEIR prepared in connection with the project sufficiently analyzes both the feasible mitigation measures necessary to avoid or substantially lessen the project's potential environmental impacts and a range of feasible alternatives capable of eliminating or reducing these effects in accordance with CEQA and the State CEQA Guidelines.

All of the potentially significant impacts of the project could be mitigated to below a level of significance with the imposition of all feasible mitigation measures, except that the following impacts remain significant and unavoidable even after the imposition of all feasible mitigation measures: air quality and biological resources.

We have prepared the enclosed Mitigation Monitoring and Reporting Program as required by the State CEQA Guidelines § 15097, which includes maintaining records to ensure compliance with environmental mitigation measures adopted as part of this project. Since significant and unavoidable environmental impacts from the project remain after the imposition of all feasible mitigation measures, your Board is being asked to adopt the enclosed Findings of Fact and Statement of Overriding Considerations, stating that the significant effects on the environment found to be unavoidable are acceptable due to overriding benefits set forth in the Statement of Overriding Considerations.

A fee must be paid to the State Department of Fish and Game when certain notices required by CEQA are filed with the County Clerk. Upon approval of the PEIR by your Board, the District will submit $850 to the County Clerk for this fee. In addition, a $25 handling fee will be paid to the County Clerk for processing. A Notice of Determination in accordance with the requirements of § 21152(a) of the California Public Resources Code will be filed within five working days after project approval.

CONTRACTING PROCESS

Not applicable.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

The project will not have a significant impact on current services or projects currently planned.

CONCLUSION

Please return three approved copies of this letter to Public Works.

Respectfully submitted,

JAMES A. NOYES
Director of Public Works

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Enc.

cc: Chief Administrative Office
County Counsel

SUN VALLEY WATERSHED MANAGEMENT PLAN
FINDINGS AND
STATEMENT OF OVERRIDING CONSIDERATIONS

SECTION 1 – INTRODUCTION

Pursuant to the California Environmental Quality Act ("CEQA," Public Resources Code §§ 21000-21178.1) and the State CEQA Guidelines (14 Cal. Code Regs., §§ 15000-15387), the County of Los Angeles (County) is the lead agency for the Sun Valley Watershed Management Plan (Project). The Project is a multi-purpose flood control program to solve the local flooding problem in the Sun Valley Watershed area while increasing water conservation, recreational opportunities and wildlife habitat, and reducing stormwater pollution. Implementation of the Project will include construction of various stormwater facilities within the watershed, both small and large-scale, including those for retention and/or infiltration, conveyance, and distribution for reuse. The County prepared a Program Environmental Impact Report (PEIR) for the Project (State Clearinghouse No. 2002111051), which analyzed the potentially significant environmental impacts of the Project.

The Project is comprised of multiple components located throughout the Sun Valley Watershed, approximately 14 miles northwest of downtown Los Angeles, near the intersection of Interstate 5 and State Highway 170. The watershed is approximately 4.4 square miles in area and encompasses the communities of Sun Valley and North Hollywood in the City of Los Angeles. The Project consists of multiple components, each designed to manage stormwater runoff and reduce flooding while also achieving other project objectives. The PEIR analyzed implementation of the Project, defined as the following 17 potential components:

- Cal Mat Pit
- New Park on Wentworth
- Onsite Best Management Practices (BMPs)
- Parking Lot on Sherman Way
- Power Line Easement
- Roscoe Elementary School
- Sheldon Pit and Tujunga Wash Diversion
- Stonehurst Elementary School
- Stonehurst Park
- Storm Drains
- Strathern Pit
- Street Storage
- Sun Valley Middle School
- Tree Planting and Mulching
- Tuxford Green
- Valley Steam Plant
- Vulcan Gravel Processing Plant

CEQA Procedures

Notice of Preparation and Public Meeting. The County of Los Angeles Department of Public Works (LACDPW), as the division of the County responsible for preparing the PEIR, issued a Notice of Preparation for the Project in November 2002 and circulated it for a period of 30 days pursuant to State CEQA Guidelines Sections 15082[a], 15103 and 15375. The Notice of Preparation was accompanied by an Initial Environmental Study, which found that Project

impacts related to the following environmental topics were less than significant: aesthetics, agricultural resources, land use and planning, and population and housing.

Pursuant to State CEQA Guidelines Section 15082, LACDPW solicited comments from potential responsible agencies, including details about the scope and content of the environmental information related to the responsible agency's area of statutory responsibility, as well as the significant environmental issues, reasonable alternatives and mitigation measures that the responsible agency would have analyzed in the Draft PEIR.

Thirteen written statements were received by LACDPW in response to the Notice of Preparation, which assisted LACDPW in focusing the environmental analysis in the Draft PEIR. Additionally, a public scoping meeting for the Project was held at the Sun Valley Middle School on November 20, 2002. Oral comments and written comment cards were received at the meeting.

Draft PEIR Circulation and Public Meeting. A Draft PEIR was completed and released for public review on October 24, 2003, and LACDPW initiated a 45-day public comment period by filing a Notice of Completion (NOC) and a Notice of Availability (NOA) with the State Office of Planning and Research. Pursuant to Public Resources Code Section 21092, LACDPW also provided the NOA to all organizations and individuals who had previously requested such notice. Pursuant to State CEQA Guidelines Section 15086, the NOA and the Draft PEIR were mailed to a total of 65 agencies (including all responsible and trustee agencies), organizations, and interested individuals. The NOA was published in three newspapers of general circulation in the project area (San Fernando Valley Sun, October 23, 2003; Los Angeles Times San Fernando Valley Edition, October 24, 2003; and El Economico, October 31, 2003). In addition, the NOA was mailed to 10 regional Native American Tribal representatives and over 2,400 property owners in the project area. The NOA was filed with the Los Angeles County Clerk for public posting. Copies of the Draft PEIR were made available for public review at the LACDPW office in Alhambra, 10 local and area libraries, and on the Sun Valley Watershed website (www.sunvalleywatershed.org). The public review and comment period lasted for 45 days from October 24 through December 8, 2003. In addition, LACDPW held a public meeting on the Draft PEIR on October 29, 2003 at Sun Valley Middle School. Comments were received in English and Spanish (with a simultaneous interpreter) during the public meeting.

During the official public review period for the Draft PEIR, LACDPW received written comments from 17 public agencies and organizations, all of which LACDPW responded to in the Final PEIR. Written responses to comments were provided as required by State CEQA Guidelines § 21092.5.

Final PEIR. LACDPW prepared the Final PEIR and, pursuant to Public Resources Code Section 21092.5, LACDPW provided copies of the Final PEIR to all commenting agencies.

The Board of Supervisors of the County of Los Angeles, at its regularly scheduled public meeting on June 29, 2004, reviewed the Draft PEIR and Final PEIR.

All the requirements of CEQA and the State CEQA Guidelines have been satisfied by the County in the PEIR, which is sufficiently detailed so that all of the potentially significant environmental effects of the Project have been adequately evaluated.

The PEIR prepared in connection with the Project sufficiently analyzes both the feasible mitigation measures necessary to avoid or substantially lessen the Project's potential environmental impacts and a range of feasible alternatives capable of eliminating or reducing these effects, as well as the "No Project" alternative, in accordance with CEQA and the State CEQA Guidelines.

SECTION 2 – FINDINGS

The findings made by the Board of Supervisors, pursuant to State CEQA Guidelines Section 15091 on the proposed Sun Valley Watershed Management Plan are presented below.

Environmental impacts identified in the Final PEIR which the Board of Supervisors finds are less than significant and do not require mitigation are described in **Section 2.1**.

Environmental impacts identified in the Final PEIR as potentially significant but which the Board of Supervisors finds can be mitigated to a level of less than significant, through the imposition of feasible mitigation measures identified in the Final PEIR and set forth herein, are described in **Section 2.2**.

Environmental impacts identified in the Final PEIR as potentially significant but which the Board of Supervisors finds remain significant and unavoidable, despite the imposition of all feasible mitigation measures identified in the Final PEIR and set forth herein, are described in **Section 2.3**.

Alternatives to the Project that might eliminate or reduce significant environmental impacts are described in **Section 5**.

Prior to taking action, the Board of Supervisors has heard, been presented with, reviewed and considered all of the information and data in the administrative record, including the Final PEIR, and all oral and written evidence presented to it during all meetings and hearings.

2.1 Beneficial and Less than Significant Impacts

The following potential environmental impacts of the Project are less than significant or beneficial and therefore do not require the imposition of mitigation measures. However, although not required under CEQA, mitigation measures have been incorporated into the Project for some of these impacts to further reduce less than significant adverse effects.

AIR QUALITY: Construction of the proposed facilities would result in less-than-significant PM10 emissions associated with earth moving activities. (PEIR, p. 4.1-11.) The following mitigation measures have been incorporated into the Project to further reduce PM10 emissions:

A-1 Clean dirt from construction vehicle tires and undercarriages when leaving the construction site and before entering local roadways.

A-2 During earth-moving activities, water the construction area as necessary, but at least twice per day.

A-3 Water temporary open storage piles once per hour or install temporary covers.

A-4 Water unpaved roadways three times per day or apply non-toxic soil stabilizers.

A-5 Limit construction vehicle speed on the project site to 15 miles per hour (mph) or less.

A-6 Cover dirt in trucks during on-road hauling.

A-7 Cease earth-moving activities on days when wind gusts exceed 25 mph or apply water to soil not more than 15 minutes prior to moving such soil.

A-8 Sweep streets near the construction area at the end of the day if visible soil material is present.

A-9 For applicable construction areas, establish a vegetative groundcover as soon as feasible after active operations have ceased. Groundcover will be of sufficient density to expose less than 30 percent of unstabilized ground within 90 days of planting.

Based on the site acreage and amount of earthwork involved, the following project components may require implementation of the following mitigation measure per SCAQMD Rule 403: Sheldon Pit, Cal Mat Pit, and Strathern Pit.

A-10 Per SCAQMD Rule 403(f), large construction operations (greater than 100 acres of disturbed area or daily earth-moving or throughput volume of 10,000 cubic yards three times during the most recent 365-day period) will either 1) implement fugitive dust suppression measures as specified in Tables 1 and 2 of Rule 403, or 2) prepare a fugitive dust emissions control plan and obtain approval from SCAQMD.

AIR QUALITY: Operation and maintenance of proposed facilities would result in less-than-significant air emissions (primarily associated with tailpipe emissions from maintenance vehicles and visitors to proposed parks). (PEIR, pp. 4.1-12 to 13.)

BIOLOGICAL RESOURCES: Construction of proposed facilities at the following Project component sites would result in less-than-significant impacts on the limited biological resources (low-value and/or disturbed habitats) present at these sites: Parking Lot on Sherman, Power Line Easement, Roscoe Elementary School, Stonehurst Elementary School, Stonehurst Park, Storm Drains, Sun Valley Middle School, Street Storage, Tree Planting and Mulching, Tuxford Green, and Valley Steam Plant. (PEIR, p. 4.2-14.)

BIOLOGICAL RESOURCES: Once construction is complete, the Project would have beneficial impacts on biological resources by providing additional or enhanced vegetation and habitats in the project area. The greatest potential for creation of wildlife habitat exists at the project components involving restoration of the gravel pits (i.e., Sheldon Pit, Cal Mat Pit, and Strathern Pit) due to their large sizes. (PEIR, p. 4.2-18.)

CULTURAL RESOURCES: Due to the level of previous development and disturbance that has occurred at the Project sites and the geology of the area, the potential for encountering prehistoric and paleontological resources during Project construction is considered to be low. The Project would have a less than significant impact on prehistoric and paleontological resources. (PEIR, p. 4.3-5.)

CULTURAL RESOURCES: The following Project components contain potentially significant historical resources: Stonehurst Park, Valley Steam Plant, Roscoe Elementary School, Power Line Easement, and Strathern Pit. Since the Project does not involve any modification to these potential historical structures, this impact is less than significant. (PEIR, pp. 4.3-5 to 7.)

CULTURAL RESOURCES: The potential for encountering buried archaeological resources during Project construction at the following Project component sites is considered to be low: New Park on Wentworth, Onsite BMPs, Parking Lot on Sherman, Power Line Easement, Stonehurst Elementary School, Storm Drains, Street Storage, Sun Valley Middle School, Sun Valley Park, Tree Planting and Mulching, Tuxford Green, Vulcan Gravel Processing Plant. Therefore, this impact is less than significant. (PEIR, p. 4.3-7.) The following mitigation measures have been incorporated into the Project to further reduce this impact:

C-3 If previously unknown cultural resources are discovered in the course of excavation for project construction at any project site, the construction inspector shall have the authority and responsibility to halt construction until a qualified archaeologist can evaluate the significance and distribution of the materials, and identify future activities needed. If the cultural material discovered is determined to be of potential archaeological significance, the investigation and future activities shall be conducted in consultation with culturally affiliated Native American or other parties, as necessary.

C-4 If human remains are discovered in the course of excavation for project construction, the County Coroner shall be contacted and provisions of State CEQA Guidelines Section 15064.5 would be followed.

GEOLOGY AND SOILS: The construction and installation activities for the Project will conform to the latest versions of the City of Los Angeles Building Code and other applicable building codes. Adherence to these regulations is required for the Project and would minimize potential seismic impacts to the proposed structures. Therefore, the impacts of the Project related to seismic ground shaking and surface rupture would be less than significant. (PEIR, p. 4.4-9.)

GEOLOGY AND SOILS: Soils in the Project area are alluvial deposits and are not susceptible to expansion from changes in moisture content. Therefore, the Project is anticipated to have no impacts related to expansive soils. (PEIR, p. 4.4-11.)

GEOLOGY AND SOILS: The Project would involve minor groundwater withdrawal for groundwater quality monitoring. However, the amount required would be a negligible fraction of existing groundwater extractions in the area and would be more than offset by the proposed infiltration of stormwater, which would overall result in a beneficial impact with respect to subsidence. Therefore, the Project is not expected to result in subsidence. (PEIR, p. 4.4-11.)

HAZARDOUS MATERIALS: Impacts related to hazardous materials (sodium hypochlorite for stormwater disinfection, potential removal of railroad ties at Valley Steam Plant, and disposal of potentially contaminated sediments during maintenance of stormwater facilities) are less than significant since handling and storage of these materials would be conducted in accordance with existing regulations, manufacturers' recommendations, and/or general standards of use. (PEIR, p. 4.5-6.)

HAZARDS: Due to the highly urbanized nature of the Project area and the continuing influence of human activity, water features proposed as part of some Project components (e.g., wetlands and lakes) are not expected to result in a substantial increase in waterfowl populations. Therefore, the Project would not result in a substantial increase in the potential for bird/wildlife aircraft strike hazard at nearby airports. (PEIR, p. 4.5-7.) The following mitigation measure has been incorporated into the Project to further reduce this impact:

H-2 During the detailed design phase of Sheldon Pit, Cal Mat Pit, and Strathern Pit, FAA Western Pacific Regional Office, Burbank Airport, and Whiteman Airport will be notified of the proposed land use change.

HAZARDS: Impacts to public safety (including school safety) from operation of proposed stormwater management and recreational facilities would be less than significant since standard measures to ensure site security and safety (e.g., fencing) would be incorporated into Project design. (PEIR, p. 4.5-8.)

HYDROLOGY (DRAINAGE AND FLOODING): The proposed stormwater management facilities would increase runoff retention capacity and reduce peak flow rates, which would result in beneficial reduction in local and downstream flooding. (PEIR, pp. 4.6-7 to 9.)

HYDROLOGY (DRAINAGE AND FLOODING): During detailed design of Strathern Pit, Cal Mat Pit, Sheldon Pit, Valley Steam Plant, Vulcan Gravel Processing Plant, Power Line Easement, LACDPW will determine whether each proposed structure would be jurisdictional according to DSOD criteria. If structures are determined to be jurisdictional, LACDPW will file the plans and specifications with DSOD and consult with DSOD staff regarding any dam safety related issues. With consultation and incorporation of any design recommendations from the DSOD, Project impacts related to dam safety would be less than significant. (PEIR, p. 4.6-10.)

HYDROLOGY (SURFACE WATER): Construction of the proposed diversion structure in Tujunga Wash (part of Sheldon Pit Project component) would involve excavation of the concrete

channel of the Tujunga Wash, resulting in a temporary increase in the potential for soil erosion and release of sediments in the event of a storm. With incorporation of conditions of agency approvals (e.g., Clean Water Act Section 404 permit), Project modifications to Tujunga Wash are expected to result in less than significant impacts on water quality. (PEIR, pp. 4.7-34 to 35.)

HYDROLOGY (SURFACE WATER): Construction of the proposed stormwater retention facilities would substantially reduce the amount of runoff currently discharged to the River. Runoff retention would reduce the stormwater pollutants currently discharged from the Project area, a beneficial impact on the water quality of the Los Angeles River. (PEIR, p. 4.7-35.)

HYDROLOGY (GROUNDWATER): With the proposed treatment prior to infiltration, use of stormwater for groundwater recharge under the Project is not expected to result in groundwater contamination. Treatment methods designed to remove suspended solids and floatables (e.g., oil and grease) are expected to remove many of the pollutants (e.g., heavy metals and organics) that are sorbed onto particulates. For Project components that include industrial land uses in the drainage areas, additional treatment, including constructed wetlands and use of proprietary stormwater filters, will be used to further improve water quality. Some of the dissolved constituents that are not removed in treatment processes prior to infiltration will be further removed in the vadose zone as water infiltrates into the soils. While the coarse and permeable nature of the Project area soils is not highly conducive to pollutant removal, the depth of the vadose zone in the Project area is anticipated to be sufficient to protect the groundwater. (PEIR, p. 4.7-10.)

Project impacts on groundwater quality from pollutants in stormwater are anticipated to be less than significant. The proposed Phase 1 Project components, which are intended to be completed in a relatively short timeframe (1 to 3 years), include a comprehensive stormwater and groundwater quality monitoring program. Results of the monitoring for Phase 1 Project components will be used to assess the effectiveness of the proposed stormwater treatment methods in protecting both surface and groundwater. Information obtained from the Phase 1 monitoring program will be incorporated into the detailed design of subsequent Project components to address any groundwater quality impact concerns that might arise during operation of Phase 1 Project components. The following mitigation measures will be implemented to coordinate stakeholder review of monitoring results and to determine the necessity of additional stormwater treatment. (PEIR, pp. 4.7-10 to 11.)

W-2 LACDPW will prepare an annual vadose zone, surface water, and groundwater quality monitoring report to present the results of the Phase 1 projects to the Stakeholders. LACDPW will work with the Stakeholders to evaluate the effectiveness of the stormwater treatment devices and determine the necessity of additional stormwater treatment prior to subsequent infiltration or for use in wetlands designed to provide wildlife habitat. Where indicated based on water quality concerns, additional stormwater treatment will be installed or infiltration will be discontinued at the relevant site. For sites with constructed wetlands that support wildlife habitat, modifications necessary based on water quality concerns will be designed to retain wetland vegetation or manage the wetlands in accordance with wildlife agency agreements or consultations.

HYDROLOGY (GROUNDWATER): Based on the results of groundwater modeling conducted by the City of Los Angeles Department of Water and Power, Project infiltration is not expected to result in substantial increases in groundwater levels in the Project area. Therefore, Project infiltration is not expected to inundate landfill materials at Bradley Landfill. This is considered a less than significant impact. (PEIR, pp. 4.7-46 to 51.) Since the Sheldon Pit component would provide the bulk of the infiltration proposed by the Project, the following mitigation will be implemented for Sheldon Pit in order to further reduce the potential for inundation of landfill materials. (PEIR, pp. 4.7-51.)

W-3 Prior to starting operation of Sheldon Pit, LACDPW will coordinate with Waste Management Inc., the Regional Board, and ULARA Watermaster to develop a contingency plan that will be implemented in the event the groundwater levels at existing monitoring wells around Bradley Landfill reach the "alert level" of 745 feet msl. The contingency plan will outline actions to be taken if the "alert level" is reached (e.g., reduce or stop stormwater infiltration for a period of time until groundwater levels begin to fall).

HYDROLOGY (GROUNDWATER): Based on the results of groundwater modeling conducted by the City of Los Angeles Department of Water and Power, Project infiltration would not significantly alter the groundwater flow directions in the San Fernando Basin, and therefore would not substantially change the shape or configuration of the existing contaminant plume. Therefore, Project infiltration would not interfere with the remediation and cleanup of the existing volatile organic compound contaminant plumes in the San Fernando Basin. This is considered a less than significant impact. (PEIR, p. 4.7-51.)

NOISE: The Project involves operation of pumps, use of vehicles for facility maintenance, and increased traffic to parks, which would result in generation of minor operational noise. This is a less than significant impact. (PEIR, pp. 4.8-9 to 10.)

PUBLIC SERVICES: The Project does not involve construction of housing or other structures that would result in a substantial increase in the demand for fire protection, emergency medical services, or police services. Operational impacts on fire and police services are less than significant. (PEIR, pp. 4.9-2 to 4.)

RECREATION: Construction activities at existing parks and recreational facilities at schools (Stonehurst Park, Sun Valley Middle School, Roscoe Elementary School, and Stonehurst Elementary School) may result in temporary increases in the use of other existing recreational facilities in the area. However, any increase in usage at other nearby recreational facilities would be short-term and minimal, and is not expected to cause or accelerate a substantial physical deterioration of those facilities. (PEIR, pp. 4.10-2 to 3.)

RECREATION: The Project includes various Project components that would provide new recreational facilities and open space accessible to the residents in the Project area, a beneficial impact on recreational resources. (PEIR, p. 4.10-2.)

TRAFFIC: Operational impacts on traffic from increased visitors to proposed recreational facilities are less than significant based on a comparative analysis of traffic volumes and levels of service with and without each Project component. (PEIR, pp. 4.11-49 to 54.)

SOLID WASTE: Construction waste generated as a result of implementation of Project components would primarily include soil, asphalt, concrete, and rock. Since implementation of various Project components and associated construction waste generation would be phased over approximately 10 years and since onsite reuse/redistribution of soil would reduce the net amount of construction waste, the Project would result in a less than significant impact on landfill capacity. (PEIR, p. 4.12-5 to 7.) The following mitigation measure has been incorporated into the Project to further reduce construction waste.

U-4 The plans and specifications for the proposed project will state that the construction contractor is required to identify and implement programs for minimizing solid waste generated during construction. These programs will include, at a minimum, recycling of asphalt and concrete paving materials, and balance of graded soil on site to the maximum extent feasible.

SOLID WASTE: During Project construction within roadways, some roadway lane closures may be required, which may require temporary modifications to the existing solid waste collection routes. Temporary changes to the collection routes would be a less-than-significant impact. The following mitigation measure has been incorporated into the Project to further reduce impacts on solid waste collection routes. (PEIR, p. 4.12-6.)

U-5 Prior to construction, the City of Los Angeles Bureau of Sanitation will be notified of the construction schedule and planned lane or road closures so that solid waste collection routes and access in the area may be modified accordingly.

SOLID WASTE AND UTILITIES: Operation of Project facilities would result in minor increases in solid waste (sediments removed periodically from the stormwater collection facilities during maintenance), electricity consumption (operation of pumps, irrigation systems, and park buildings, if any), water (backup to the stormwater reuse irrigation system or for park buildings), and sewage (park buildings). Operational impacts related to solid waste generation and utilities and service systems are less than significant. (PEIR, pp. 4.12-6 to 7.)

2.2 Impacts Mitigated to a Less Than Significant Level

Pursuant to State CEQA Guidelines Section 15091, the following are the impacts of the Project for which mitigation measures have been identified in the Draft PEIR which will avoid or substantially lessen the following potentially significant environmental impacts to a less than significant level:

BIOLOGICAL RESOURCES: Construction impacts on the existing coastal sage scrub vegetation at New Park on Wentworth (PEIR, p. 4.2-14)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: The specific design of the proposed facilities at New Park on Wentworth, and therefore the impact on existing coastal sage scrub habitat on that site (approximately 1.5 acres), are not known at this time. Construction impacts on the exiting coastal sage scrub habitat and associated wildlife may be considered significant because of the limited regional availability of this native habitat type. (PEIR, p. 4.2-14.) Avoidance of the habitat during construction would avoid the impact. However, since design is not known, it may not be possible to avoid the habitat, and as an alternative it is possible the habitat could be restored after construction. If avoidance or restoration are not possible, the habitat loss will be mitigated through preservation at other Project sites, or onsite restoration of a substitute high value habitat. Thus, with implementation of the following mitigation measure, impacts on coastal sage scrub vegetation at New Park on Wentworth would be avoided or reduced to less than significant levels:

B-1 The existing coastal sage scrub vegetation at New Park on Wentworth will be incorporated into the park design, or the proposed facilities will be sited to avoid or minimize disturbance and loss of the vegetation during construction. However, if avoidance is not feasible, the following will be implemented:

(a) If the existing coastal sage scrub vegetation will be unavoidably impacted by project construction, the vegetation and associated topsoil will be removed, salvaged or mulched, and stockpiled separately. Following the completion of project construction, the stockpiled topsoil will be replaced and stockpiled vegetation will be replanted (or replaced if mulched) on the site of origin or on another adjacent location as appropriate, under the direction of a qualified biologist. Retention and reapplication of stockpiled topsoil and vegetation will be supplemented with onsite restoration and/or rehabilitation of the same vegetation type at a ratio of 1:1, at minimum, as appropriate and biologically feasible; or

(b) If post-construction restoration and/or rehabilitation locations cannot be identified on-site, then appropriate and biologically feasible locations identified within other component sites shall be expanded to accommodate additional restoration to meet the 1:1 ratio, at minimum; or

(c) If appropriate and biologically feasible restoration and/or rehabilitation for the impacted coastal sage scrub cannot cumulatively be identified within the project component sites, and conditions on the site(s) are appropriate and biologically feasible for a different high-value vegetation type on the site, restoration and/or rehabilitation of this vegetation type may be substituted at a ratio of 1:1, at minimum.

BIOLOGICAL RESOURCES: Construction impacts on sensitive habitat types whose presence could not be determined as a result of the denial of legal access to the sites by the property owners at Cal Mat Pit, Sheldon Pit, Strathern Pit, and Vulcan Gravel Processing Plant (PEIR, p. 4.2-14)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: Biological impact analysis at Project sites for which legal access was denied by the property owners (i.e., Vulcan Gravel Processing Plant, Sheldon Pit, Cal Mat Pit, and Strathern Pit) was conducted based on baseline biological conditions assumed from: 1) review of the relevant literature; 2) visual reconnaissance from immediately adjacent off-site areas; and 3) interpolation from aerial photographs. (PEIR, pp. 4.2-2, 4.2-13.) Since onsite surveys could not be conducted at these sites and the specific design of the proposed facilities are not known at this time, the impacts on high-value vegetation types potentially present at these sites are not known at this time. Construction impacts on the high-value vegetation type(s), if any, and associated wildlife may be considered significant because of the limited regional availability of these native habitat types. (PEIR, p. 4.2-14.) To determine the impact at these sites, each will be surveyed at the appropriate time after a particular project has been proposed on each site. If high value habitat is identified during those surveys, it will be avoided if feasible. However, since design at each site is not known, it may not be possible to avoid the habitat, and as an alternative it is possible the habitat could be restored after construction. If avoidance or restoration are not possible, the habitat loss will be mitigated through preservation at other Project sites, or onsite restoration of a substitute high value habitat. Thus, with implementation of the following mitigation, impacts on high-value vegetation type(s) at these sites would be reduced to less than significant levels:

B-2 Prior to construction of Vulcan Gravel Processing Plant, Sheldon Pit, Cal Mat Pit, and Strathern Pit, the sites will be surveyed in accordance with agency protocols at the appropriate time of the year for the presence or absence of high-value native vegetation and habitats, including special status vegetation and wetland or riparian vegetation. If high value vegetation/habitat types are identified, the proposed facilities will be designed and/or sited to avoid or minimize disturbance and loss of the vegetation and habitats during construction. However, depending on the location of sensitive resources at the sites, if any, project redesign that avoids the biological resources while still meeting the flood control objective of the project component may be infeasible. For example, the large size of the stormwater retention/infiltration basins proposed for the gravel pit sites might preclude complete avoidance of sensitive biological resources. Therefore, if avoidance is not feasible, the following will be implemented:

(a) If a high value vegetation type will be unavoidably impacted by project construction, the vegetation and associated topsoil will be removed, salvaged or mulched, and stockpiled separately. Following the completion of project construction, the stockpiled topsoil will be replaced and stockpiled vegetation will be replanted (or replaced if mulched) on the site of origin or on another adjacent location as appropriate, under the direction of a qualified biologist. Retention and reapplication of stockpiled topsoil and vegetation will be supplemented with onsite restoration and/or rehabilitation of the same vegetation type at a ratio of 1:1, at minimum, as appropriate and biologically feasible; or

(b) If post-construction restoration and/or rehabilitation locations cannot be identified on-site, then appropriate and biologically feasible locations identified within other

component sites shall be expanded to accommodate additional restoration to meet the 1:1 ratio, at minimum; or

(c) If appropriate and biologically feasible restoration and/or rehabilitation for the impacted high value vegetation type cannot cumulatively be identified within the project component sites, and conditions on the site(s) are appropriate and biologically feasible for a different high-value vegetation type on the site, restoration and/or rehabilitation of this vegetation type may be substituted at a ratio of 1:1, at minimum.

(d) Each acre of created wetlands that requires maintenance (e.g., sediment removal), and will be used to mitigate impacts to existing wetlands in (a) through (c) above, will be used for mitigation at a ratio of 2:1.

(e) The post-construction native vegetation restoration will be conducted under the direction of a qualified biologist. Where possible, restoration and/or rehabilitation will be consistent with, or a supplement to, any approved Reclamation Plan approved for any of these component sites.

(f) If wetland or riparian vegetation within the waters of the United States will be unavoidably impacted by project construction, USACE will be consulted regarding permits required under Clean Water Act Section 404. All necessary federal and state approvals (including coordination with CDFG and additional CEQA review) will be obtained prior to the implementation of construction activities. The acreage of created wetlands that would be disturbed for maintenance purposes (e.g., sediment removal) will be discounted from the total acreage necessary to mitigate impacts to existing wetlands.

BIOLOGICAL RESOURCES: Construction impacts to nesting birds protected by the Migratory Bird Treaty Act potentially present at the Vulcan Gravel Processing Plant, Sheldon Pit, Cal Mat Pit, Strathern Pit, and New Park on Wentworth (PEIR, p. 4.2-14)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: The Project site at New Park on Wentworth contains approximately 1.5 acres of coastal sage scrub, a high-value, native habitat type. (PEIR, p. 4.2-14.) Legal access to the Project sites at Cal Mat Pit, Sheldon Pit, Strathern Pit, and Vulcan Gravel Processing Plant to conduct biological surveys was requested but denied by the property owners. The sites have the potential to contain high value native habitats. Surveys will be conducted prior to construction pursuant to mitigation measure B-2. (PEIR, pp. 4.2-13.) Construction activities at these Project sites during bird breeding season could result in inadvertent disturbance of birds protected by the Migratory Bird Treaty Act or a part, nest, or egg of any such bird. (PEIR, p. 4.2-14.) Avoidance of nests during breeding season would avoid this potential impact. If construction must take place during the breeding season, the most effective way to avoid the impact is to maintain a buffer between construction activities and active nesting sites. Thus, with implementation of the following mitigation, impacts on birds protected by the Migratory Bird Treaty Act would be reduced to less than significant levels:

B-5 If feasible, project activities with the potential to disturb native and non-native vegetation and man-made nesting structure shall take place outside of the breeding season (which generally runs from March 1 to August 31 and as early as February 1 for some raptors) for birds protected by the Migratory Bird Treaty Act.

If project activities must occur during the breeding season of birds covered by the Migratory Bird Treaty Act, then beginning 30 days prior to construction, weekly bird surveys shall be arranged. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work at the site. If a bird covered by the Migratory Bird Treaty Act is detected on the site, then the nesting activity will be monitored to ensure that construction activities do not occur within 300 feet of the nest (500 feet for raptors) until the juvenile birds have fledged and no further nesting attempts are initiated.

CULTURAL RESOURCES: Construction impact on archaeological resources potentially present at Cal Mat Pit, Roscoe Elementary School, Sheldon Pit, Stonehurst Park, Strathern Pit, and Valley Steam plant (PEIR, p. 4.3-7).

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: Based on the age and historical usage of the sites, the following six Project components were deemed to have some potential for buried archaeological materials: Cal Mat Pit, Strathern Pit, Sheldon Pit, Stonehurst Park, Valley Steam Plant, and Roscoe Elementary School. (PEIR, pp. 4.3-6.) Construction at all of these Project sites involves excavation, grading, and/or other earth moving activities. If buried archaeological resources were encountered and disturbed during Project construction at these sites, this would be a potentially significant impact. (*Ibid.*) At the time a project component is being constructed on these sites, professional monitoring for potential cultural resources could result in work stoppages to appropriately assess the archaeological value of any materials found on site. Thus, with implementation of the following mitigation, construction impacts on buried archaeological resources potentially present at Cal Mat Pit, Strathern Pit, Sheldon Pit, Stonehurst Park, Valley Steam Plant, and Roscoe Elementary School would be reduced to less than significant levels:

C-1 A professional monitor qualified in historical archaeology shall be present for subsurface work between the surface and 5 feet in depth at the following project component sites: Stonehurst Park, Valley Steam Plant, and Roscoe Elementary School. If potentially important cultural deposits are encountered in the course of construction, work should be temporarily diverted from the vicinity of the discovery until the monitoring archaeologist can identify and evaluate the importance of the find and conduct any appropriate assessment and activities, as necessary.

C-2 On the first day of subsurface work, if any, at Strathern Pit, Cal Mat Pit and Sheldon Pit, a professional monitor qualified in historical archaeology shall be present to assess whether further monitoring might be warranted.

CULTURAL RESOURCES: Construction impact on unknown but potentially historical resources (machinery, refuse, or structures related to gravel mining operations) at Strathern Pit, Cal Mat Pit, and Sheldon Pit (PEIR, pp. 4.3-5 to 6)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: Strathern Pit, Cal Mat Pit, and Sheldon Pit are exhausted gravel pits that date to the 1890s, and were instrumental in the development of the Los Angeles Harbor breakwater (1897-1913) and other significant construction Projects in the region. Because of the age of the facilities, there is some potential that historical machinery, refuse, and structures dating to the earliest period of use may be present. However, since legal site access to Strathern Pit, Cal Mat Pit, and Sheldon Pit could not be obtained from the property owners, the presence of original machinery, refuse, or structures that may be eligible to the California Register of Historical Resources cannot be ascertained at this time. (PEIR, p. 4.3-6.) During the design phase of Strathern Pit, Cal Mat Pit, and Sheldon Pit, LACDPW will conduct additional research and on-site surface inventory to determine their presence and, if any, historical significance. If machinery, refuse, and/or structures at Strathern Pit, Sheldon Pit or Cal Mat Pit are determined to be historically significant, construction of proposed facilities at these sites could have significant impacts on such historical resources. (*Ibid.*) With implementation of the following mitigation, impacts on historical resources potentially present at Cal Mat Pit, Strathern Pit, and Sheldon Pit would be reduced to less than significant levels:

C-5 During the design phase of Strathern Pit, Cal Mat Pit, and Sheldon Pit, and once site access has been granted by the property owner, LACDPW will conduct on-site surveys to determine presence of original machinery, refuse and/or structures that date from the period of concern. If any are found, LACDPW will evaluate whether they are a historical resource using the criteria described in Section 15064.5(a) of the State CEQA Guidelines. If any equipment and/or structures at Strathern Pit, Sheldon Pit, or Cal Mat Pit are determined to be a historical resource, LACDPW will:

- Incorporate the artifact into design of the project component, or
- Remove and relocate the artifact to an appropriate location (i.e., museum, public library, or school), or
- Document with photographs and engineering drawings

GEOLOGY: Impacts related to slope instability at Cal Mat Pit, Sheldon Pit, and Strathern Pit (PEIR, pp. 4.4-9 to 10)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: The side slopes of Strathern Pit, Cal Mat Pit, and Sheldon Pit are potentially susceptible to landslides in the event of an earthquake or heavy precipitation.

Construction of the stormwater retention facilities at these pits would require substantial earth moving activities, and could result in unstable slope conditions. To ensure that modification of the gravel pits does not result in unstable slope conditions, evaluation of slope stability will be conducted as a part of the geotechnical analyses during detailed design of these Project components. (PEIR, p. 4.4-10.) With implementation of the following mitigation, impacts related to slope stability at Cal Mat Pit, Strathern Pit, and Sheldon Pit would be reduced to less than significant levels:

G-1 During detailed design of Cal Mat Pit, Sheldon Pit, and Strathern Pit components, LACDPW will incorporate the recommendations of the geotechnical analysis, which will include optimum slope design for stability and safety, soil compaction or recompaction requirements, surface cover, and potentially other slope stabilizing measures.

GEOLOGY: Impacts related to liquefaction potential from proposed stormwater infiltration at Sheldon Pit, Cal Mat Pit, and the Power Line Easement (PEIR, pp. 4.4-10 to 11)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: The Project involves infiltration of stormwater at various locations throughout the watershed. If Project-related stormwater infiltration caused groundwater levels to rise within 30 feet of the surface, the Project could result in an increased risk of liquefaction. Portions of the Project area are located in areas considered by the California Geological Survey to be susceptible to liquefaction based on historical occurrence of liquefaction or local geological and groundwater conditions. Among the Project components located in areas considered to be susceptible to liquefaction, Sheldon Pit, Power Line Easement, and Cal Mat Pit have the greatest potential to result in substantially increased liquefaction risk for adjacent properties or onsite structures (e.g., power line towers) based on the sizes of the proposed infiltration facilities. (PEIR, p. 4.4-10.) To ensure that stormwater infiltration does not result in an increased risk of liquefaction, risk monitoring wells will be installed and monitored, and existing wells will also be monitored, to detect any substantial increase in groundwater, and stormwater will be diverted if monitoring shows a substantial rise in groundwater. (PEIR, p. 4.4-11.) With implementation of the following mitigation, impacts related to liquefaction at Sheldon Pit, Power Line Easement, and Cal Mat Pit would be reduced to less than significant levels:

G-2 To ensure that stormwater infiltration at Sheldon Pit, Cal Mat Pit, and the Power Line Easement does not result in an increased liquefaction risk, monitoring wells proposed for the Phase 1 projects (Cal Mat Pit, Sun Valley Middle School, and Valley Steam Plant) of the Watershed Management Plan as well as existing wells in the project area will be used to detect any substantial increase in groundwater levels. If monitoring indicates a substantial rise in groundwater levels (i.e., within 30 feet of the surface) at or near Sheldon Pit, Cal Mat Pit, or the Power Line Easement, stormwater would not be infiltrated and would be diverted into storm drains or onto street surfaces.

SOILS: Construction impacts on soil erosion (PEIR, pp. 4.4-11 to 12)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: Soil disturbance associated with Project construction will increase the potential for wind and water erosion in the immediate vicinity of the facilities. As required by the Environmental Protection Agency and the Regional Board, the construction contractor(s) will develop and implement a Stormwater Pollution Prevention Plan (SWPPP) during construction of various Project components. This plan is required as part of the National Pollution Discharge Elimination System (NPDES) Permit for discharge of stormwater associated with construction activities greater than 1 acre in area. Incorporation of stormwater best management practices in the SWPPP would reduce the potential for soil erosion during construction. (PEIR, p. 4.4-11.) With implementation of the following mitigation, construction impacts on soil erosion would be reduced to less than significant levels:

W-1 The construction contractor will develop and implement a Storm Water Pollution Prevention Plan (SWPPP) for all project components (except Onsite BMPs and Tree Planting and Mulching) that involve constructing, clearing, grading or excavation on areas over 1 acre in size. The following are possible measures to be incorporated into site-specific SWPPPs. Additional sample measures and guidelines for developing SWPPPs are available in California Stormwater Quality Association's Stormwater Best Management Practice Handbook – Construction (CASQA, 2003). Measures to reduce fugitive dust generated during construction (see **Mitigation Measures A-1 through A-10**) will also minimize the potential for soil erosion.

- Install perimeter silt fences or hay bales.
- Stabilize soils through hydroseeding and use of soil stabilizers.
- Install temporary sedimentation basins.
- Conduct earth moving activities during the dry season (April through October), as feasible.
- Designate storage areas for construction materials, equipment, and maintenance supplies (e.g., fuels, lubricants, paints, solvents, adhesives) to keep these materials out of the rain and minimize contact with stormwater.
- Conduct regular inspections to ensure compliance with the SWPPP.

HAZARDOUS MATERIALS: Impacts related to potential soil contamination at Project component sites (PEIR, pp. 4.5-5 to 6)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: Two Project components, the Sun Valley Middle School and the Parking Lot on Sherman, are located on sites that might contain contaminated soils due to past leaking underground storage tanks. The Sun Valley Middle School site may also contain contaminated soils due to the presence of a former landfill below the bus garage, which is located on the southwestern portion of the school property. In addition, due to the highly urbanized environment and the presence of industrial land uses in the Project area, there is also potential for contaminated soils to be present at the other Project component sites. If contaminated soils are encountered during Project construction and are not recognized and not disposed of properly, this would be a potentially significant impact. (PEIR, pp. 4.5-6 to 7.) Evaluation of the risk of potential contaminants in a Phase I Environmental Site Assessment for these sites, as well as other Project component sites, will show whether soil sampling is necessary to determine whether contaminated soil must be avoided or properly disposed of. Thus, with implementation of the following mitigation, impacts related to contaminated soils would be reduced to less than significant levels:

H-1 During the detailed design phase of each project component (except Onsite BMPs, Tree Planting & Mulching, and Storm Drains), a Phase I Environmental Site Assessment (ESA) will be conducted to determine the site-specific potential for soil contamination. The Phase I ESA will be conducted in accordance with the latest version of the American Society of Testing and Materials (ASTM) 1527 "Standard Practice for Environmental Site Assessments: Phase I Environmental Assessment Process." This document outlines the customary practice for performing ESA's in the United States. Phase I ESA will consist of a review of site-specific documents and historical maps to determine past uses of the site, a site visit to visually inspect the property for signs of potential environmental contamination, and investigation of state and federal environmental regulatory databases (including those maintained by Regional Water Quality Control Board and Department of Toxic Substances Control) to identify recognized hazardous materials usage or spills. For project sites with infiltration, the boundary of the Phase I ESA will include parcels located within 500 feet of the project site boundary to identify active or abandoned landfills or other land uses with the potential for contaminated soils which would be incompatible with infiltration (to be cross-referenced with Mitigation Measure W-4; see Section 4.7.7). If the Phase I ESA concludes that there is no substantial potential for soil contamination, no further action would be required. For project sites with infiltration, the boundary of the Phase I ESA will include adjacent parcels to identify active or abandoned landfills (to be cross-referenced with Mitigation Measure W-5; see Section 4.7.7). If the Phase I ESA indicates that there is potential for soil to be contaminated, additional investigation (including soil sampling and analysis) will be conducted to determine the presence and extent of the contamination. If the proposed project would involve disturbance of soil in the contaminated area, soil would be removed and disposed of in compliance with applicable regulations at approved disposal sites.

HAZARDS: Public health impacts related to potential increase in mosquito habitat (PEIR, pp. 4.5-7 to 8)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: The Project involves construction of uncovered stormwater retention facilities that vary in size and operating conditions. Some of the proposed facilities would temporarily contain stagnant water, which would create potential mosquito breeding conditions. Considering the proximity of the proposed facilities to residences and the potential spread of the West Nile Virus to the Southern California region, this is a potentially significant impact on public health. (PEIR, pp. 4.5-7 to 8.) Consultation with the Greater Los Angeles Vector Control District will minimize mosquito production potential, as well as allow LACDPW to implement effective mosquito control measures. With implementation of the following mitigation, impacts on public health due to mosquitoes and mosquito-borne diseases would be reduced to less than significant levels:

H-3 LACDPW, or subsequent operator of the project component (if different), will consult and coordinate with the Greater Los Angeles Vector Control District (GLAVCD) during the detailed design, implementation, and operation phases of the following project components: Sheldon Pit, Strathern Pit, Cal Mat Pit, Power Line Easement, Valley Steam Plant, and Vulcan Gravel Processing Plant. Consultation and coordination with GLAVCD shall include the following actions:

- Consult with GLAVCD during the detailed design phase to incorporate design elements intended to minimize the mosquito production potential of the project component(s).
- Regularly consult with GLAVCD to identify mosquito management problems, mosquito monitoring and abatement procedures, and opportunities to adjust water and vegetation management practices to reduce mosquito production. Mosquito control measures to be used by GLAVCD could include mosquito fish stocking, and application of Bti, Methoprene, and/or Agnique MMF, as appropriate.

HYDROLOGY: Construction impacts on surface water quality related to soil erosion (PEIR, p. 4.7-33)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: During Project construction, soil disturbance from earth moving activities would temporarily increase the potential for soil erosion. In addition, during the rainy season, construction materials, equipment, and maintenance supplies (e.g., fuels, lubricants, paints, solvents, adhesives) may come in contact with runoff. Release of sediments and other materials from construction sites could result in a significant impact on surface water quality. As required by the EPA and the Regional Board, the construction contractors will develop and implement a Stormwater Pollution Prevention Plan (SWPPP) during construction of Project components. This plan is required as part of the NPDES Permit for discharge of stormwater associated with construction activities greater than 1 acre in area. Incorporation of stormwater

best management practices in the SWPPP would reduce the potential for soil erosion and release of other pollutants during construction as the best management practices control and prevent runoff from leaving the site. Specific control measures to be considered for inclusion in site-specific SWPPPs are listed below in Mitigation Measure W-1. With the incorporation of such control measures in the SWPPPs, construction impacts on surface water quality are expected to be less than significant. (PEIR, pp. 4.7-34 to 35.)

W-1 The construction contractor will develop and implement a Storm Water Pollution Prevention Plan (SWPPP) for all project components (except Onsite BMPs and Tree Planting and Mulching) that involve constructing, clearing, grading or excavation on areas over 1 acre in size. The following are possible measures to be incorporated into site-specific SWPPPs. Additional sample measures and guidelines for developing SWPPPs are available in California Stormwater Quality Association's Stormwater Best Management Practice Handbook – Construction (CASQA, 2003). Measures to reduce fugitive dust generated during construction (see **Mitigation Measures A-1 through A-10**) will also minimize the potential for soil erosion.

- Install perimeter silt fences or hay bales.
- Stabilize soils through hydroseeding and use of soil stabilizers.
- Install temporary sedimentation basins.
- Conduct earth moving activities during the dry season (April through October), as feasible.
- Designate storage areas for construction materials, equipment, and maintenance supplies (e.g., fuels, lubricants, paints, solvents, adhesives) to keep these materials out of the rain and minimize contact with stormwater.
- Conduct regular inspections to ensure compliance with the SWPPP.

HYDROLOGY: Groundwater quality impacts related to potential soil contamination at infiltration sites (PEIR, p. 4.7-43)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: Two of the Project components (Sun Valley Middle School and Parking Lot on Sherman) are located on sites where leaking underground storage tanks have been identified. Therefore, there is potential for soil contamination at these two sites. In addition, due to the highly urbanized environment and the presence of industrial land uses in the Project area, there is also potential for contaminated soils to be present at the other Project component sites. If stormwater were infiltrated in large amounts through contaminated soils and caused toxicants to leach out into the underlying groundwater, this would be considered a significant impact on groundwater quality. (PEIR, p. 4.7-44.) Evaluation of the risk of potential contaminants in a Phase I Environmental Site Assessment for these sites, as well as other Project component sites, will show whether soil sampling is necessary to determine whether

contaminated soil must be avoided or properly disposed of. Implementation of site-specific environmental site assessment to determine the site-specific potential for soil contamination and removal and disposal of contaminated soil, if any, in compliance with applicable regulations at approved disposal sites would minimize this impact.

H-1 During the detailed design phase of each project component (except Onsite BMPs, Tree Planting & Mulching, and Storm Drains), a Phase I Environmental Site Assessment (ESA) will be conducted to determine the site-specific potential for soil contamination. The Phase I ESA will be conducted in accordance with the latest version of the American Society of Testing and Materials (ASTM) 1527 "Standard Practice for Environmental Site Assessments: Phase I Environmental Assessment Process." This document outlines the customary practice for performing ESA's in the United States. Phase I ESA will consist of a review of site-specific documents and historical maps to determine past uses of the site, a site visit to visually inspect the property for signs of potential environmental contamination, and investigation of state and federal environmental regulatory databases (including those maintained by Regional Water Quality Control Board and Department of Toxic Substances Control) to identify recognized hazardous materials usage or spills. For project sites with infiltration, the boundary of the Phase I ESA will include parcels located within 500 feet of the project site boundary to identify active or abandoned landfills or other land uses with the potential for contaminated soils which would be incompatible with infiltration (to be cross-referenced with Mitigation Measure W-4; see Section 4.7.7). If the Phase I ESA concludes that there is no substantial potential for soil contamination, no further action would be required. For project sites with infiltration, the boundary of the Phase I ESA will include adjacent parcels to identify active or abandoned landfills (to be cross-referenced with Mitigation Measure W-5; see Section 4.7.7). If the Phase I ESA indicates that there is potential for soil to be contaminated, additional investigation (including soil sampling and analysis) will be conducted to determine the presence and extent of the contamination. If the proposed project would involve disturbance of soil in the contaminated area, soil would be removed and disposed of in compliance with applicable regulations at approved disposal sites.

HYDROLOGY: Potential inundation of landfill material at closed landfills at or near stormwater infiltration sites (PEIR, pp. 4.7-43 to 49)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: Several closed landfills (both inert waste and municipal solid waste) are located in the Project area. Based on a review of the California Integrated Waste Management Board Solid Waste Information System database, 10 known historical landfills were identified in or near the Project area. (PEIR, p. 4.7-51.) If groundwater infiltrated under the proposed Watershed Management Plan interacted with landfill materials, the impact to groundwater quality could be potentially significant. (PEIR, pp. 4.7-44 to 4.7-51; see also Responses to Comments 4-3 and 4-4.) Mitigation Measure W-4 was added in response to comments to clarify that if necessary, a groundwater monitoring program will be developed to

ensure stormwater infiltrated from Project components does not result in infiltration to or interaction with landfill materials. Thus, with implementation of the following mitigation, impacts related to potential interaction of stormwater with landfill materials at closed landfills would be reduced to less than significant levels.

W-4 If the site-specific Phase I ESA (see Mitigation Measure H-1) indicates that an active or closed landfill (either municipal solid waste or inert construction waste) is located within 500 feet from the project site boundary, a site-specific geotechnical study will be conducted to: 1) characterize the extent and composition of landfill materials; 2) determine whether the landfill materials are releasing methane; 3) and estimate the potential mounding effect from the proposed stormwater infiltration. The results of the geotechnical study will be incorporated into the project design to minimize the potential for project infiltration to result in interaction between infiltrated stormwater and landfill materials or to impact landfill gas releases, if any. Potential design modifications include siting the infiltration facilities away from the landfill and/or partially lining the facilities to direct infiltration away from the landfill. For sites with stormwater infiltration within 500 feet of an active or closed landfill, a groundwater monitoring program will then be developed and implemented to ensure that infiltration does not result in interaction between infiltrated stormwater and landfill materials or impact landfill gas releases. Infiltration would cease at any site where groundwater levels rose to within 10 feet of landfill materials.

HYDROLOGY: Impacts related to the proposed use of Tujunga Spreading Grounds for infiltration of stormwater collected at Strathern Pit (Alternatives 1, 2, and 4) (PEIR, pp. 4.7-50 to 51)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: In Alternatives 1, 2, and 4, the Project proposes to use the stormwater collected in Strathern Pit for groundwater recharge at the Tujunga Spreading Grounds. The use of Tujunga Spreading Grounds for groundwater recharge operations is currently limited, particularly in above-normal runoff years, due to the methane migration from the adjacent historical landfill (Sheldon/Arleta Landfill). A task force consisting of LACDPW, City of Los Angeles Bureau of Sanitation, LADWP, and the ULARA Watermaster's office is currently conducting a pilot study to continue limited spreading while operating a gas collection system. At this time, it cannot be determined whether the methane migration issue at the Tujunga Spreading Grounds will be resolved by the time the Strathern Pit component is implemented. (PEIR, pp. 4.7-52 to 53.) Consultation between the task force members prior to use of the Tujunga Spreading Grounds for infiltration will show how much infiltration can occur there without causing interaction with landfill methane. Thus, with implementation of the following mitigation, the potential impact of Project infiltration at Tujunga Spreading Grounds with respect to methane migration would be reduced to less than significant levels:

W-5 As part of detailed design of the Strathern Pit component (Alternatives 1, 2, and 4), LACDPW will coordinate with Los Angeles Bureau of Sanitation, LADWP, and ULARA Watermaster's office to evaluate the feasibility of using the Tujunga Spreading Grounds for

stormwater infiltration. The evaluation will determine the amount of stormwater that can be infiltrated by the proposed project without adverse effects on landfill methane migration.

NOISE: Construction noise impact on sensitive receptors (PEIR, pp. 4.8-5 to 11)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: Many of the Project component sites are located in close proximity to sensitive receptors. In several cases (Roscoe Elementary School, Stonehurst Elementary School, Sun Valley Middle School, and Stonehurst Park), the Project component sites themselves are sensitive receptors. In addition to onsite construction activities at the three schools, construction of storm drains would occur on Cahuenga Boulevard, which is adjacent to the St. Patrick's School. Based on the types of construction equipment expected to be required for each Project component, construction noise impacts may result in generation of noise in excess of standards established in the City of Los Angeles Noise Ordinance: New Park on Wentworth, Parking Lot on Sherman, Power Line Easement, Roscoe Elementary School, Sheldon Pit, Stonehurst Elementary School, Stonehurst Park, Storm Drains, Strathern Pit, Street Storage, Sun Valley Middle School. (PEIRP, p. 4.8-9.) Limiting construction hours to avoid nighttime hours, as well as muffling of construction equipment, reduces this impact. In addition, development of site-specific noise mitigation plans with a target of reducing noise impacts to 75 dBA at the nearest residence and 67 dBA at school sites during project construction will further mitigate this impact. Thus, with implementation of the following mitigation, noise impacts during Project construction would be reduced to less than significant levels:

The following noise mitigation measures (N-1 and N-2) will be implemented during Project construction (except Tree Planting & Mulching):

N-1 Construction activities will be limited to the hours allowed by the City of Los Angeles Noise Ordinance (i.e., between 7 a.m. and 9 p.m. on weekdays and between 8 a.m. and 6 p.m. on Saturdays and national holidays) unless written permission has been obtained from the City of Los Angeles Board of Police Commissioners per Section 41.40 of the Los Angeles Municipal Code.

N-2 All mobile construction equipment will be equipped with properly operating mufflers or other noise reduction devices.

The following noise mitigation measures (N-3 and N-4) will be implemented during project construction (except Onsite BMPs, Tree Planting & Mulching, and Storm Drains):

N-3 For discrete project component sites, businesses and residences immediately adjacent to the construction site will be notified prior to the start of construction, e.g., via flyers. A toll free number for noise complaints will be included in this notification.

N-4 Prior to the start of construction of the project components, the construction contractor will develop a site-specific noise mitigation plan based on an updated estimate of construction equipment and schedule for each project component. The objective of the mitigation plans will be to reduce noise levels to 75 dBA at the nearest residence and 67 dBA

at school sites during project construction. The mitigation plans will identify potential mitigation measures, including installation of sound walls, sound curtains, and other temporary sound barriers; selection of quieter construction procedures and/or equipment; and noise monitoring to verify adherence to the identified mitigation measures. Additional mitigation measures for construction at school sites (i.e., Roscoe Elementary School, Stonehurst Elementary School, and Sun Valley Middle School) will include the following: scheduling the noisier phases of construction on Saturdays, school vacation periods, and/or after regular class hours but before 9 p.m., as feasible; and maintaining ongoing communications with the schools' administrators to address any construction noise-related issues. Coordination with St. Patrick's school will also be conducted prior to the installation of storm drains near this location.

PUBLIC SERVICES: Construction impact on police and fire protection services from temporary lane and/or road closures (Storm Drains, Street Storage, and catch basins associated with various Project components) (PEIR, pp. 4.9-2 to 3)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: The majority of the Project components involve construction of storm drains, catch basins, and other structures within street rights-of-way. During construction of these structures, temporary road or lane closures may be required. Road or lane closures may require police and fire emergency vehicles to use less direct routes in responding to emergency calls in the Project area, resulting in increased response times. In addition, Project construction may temporarily affect fire vehicle access to streets, fire hydrants or structures adjacent to the affected roadways. (PEIR, pp. 4.9-2 to 3.) Consultation with fire and police will allow for preparedness on their part for changes in traffic patterns and detours, and temporary traffic control measures will keep streets as open as possible for emergency access. With implementation of the following mitigation, impacts on police and fire protection services during Project construction would be reduced to less than significant levels:

P-1 Prior to the start of construction, the fire stations serving the project area will be consulted to review phasing, road/lane closure, and detour plans and to determine fire and emergency medical response requirements.

P-2 The project will comply with all state and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, and Safety Plan located in the City of Los Angeles General Plan (C.P.C. 19708)

P-3 Prior to the start of construction, the North Hollywood Community Police Station and/or Foothill Community Police Station will be informed, as appropriate, of project-related lane and/or road closures and detour plans.

P-4 Investigate and implement traffic control measures capable of reducing the temporary adverse effects to police and emergency vehicle responses during project construction. Such measures may include the use of flagmen and posting "No Parking" signs along the affected area.

PUBLIC SERVICES: Construction impact on school access and student safety (Stonehurst Elementary School, Sun Valley Middle School, Roscoe Elementary School, and Patrick's School) (PEIR, p. 4.9-4)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: Implementation of the Project involves construction of stormwater management facilities at Sun Valley Middle School, Stonehurst Elementary School, and Roscoe Elementary School. Construction would take place on open areas at these schools, including sports fields and playgrounds, and would involve excavation, grading, installation of underground stormwater management facilities, and tree planting. Once construction is complete, the affected area would be sodded, landscaped, or paved as necessary to restore the original surface. In addition to onsite construction activities at the three schools, construction of storm drains would occur on Cahuenga Boulevard, which is adjacent to the St. Patrick's School. Construction activities at Sun Valley Middle School, Stonehurst Elementary School, and Roscoe Elementary School and adjacent to St. Patrick's School may have temporary impacts on access to the schools and on student safety. (PEIR, p. 4.9-4.) Consideration during the planning and construction process of the impacts on schools will result in mitigation of these impacts through, for example, maintenance of bus and pedestrian access to the schools, avoidance of haul routes and construction staging adjacent to schools when they are in session, and the placement of barriers around potentially dangerous construction areas or stockpiling. Thus, with implementation of the following mitigation, impacts on school access and student safety would be reduced to less than significant levels:

P-5 Ensure that school buses have access to Sun Valley Middle School, Stonehurst Elementary School, Roscoe Elementary School, and St. Patrick's School during construction.

P-6 Ensure that safe and convenient pedestrian routes to Stonehurst, Roscoe, Sun Valley, and St. Patrick's Schools are maintained.

P-7 Maintain ongoing communication with the administrators of the schools and provide sufficient notice to forewarn children and parents when existing pedestrian and vehicular routes to school will be affected.

P-8 Install appropriate traffic controls (e.g., signs and signals) as needed to ensure pedestrian and vehicular safety.

P-9 As feasible, haul routes will not be routed past the schools except when school is not in session.

P-10 Construction or worker vehicles will not be parked or staged on streets adjacent to the schools.

P-11 All construction areas on or adjacent to schools, including trench areas, operating equipment areas and equipment staging and stockpile areas, will be secured through fencing or other barriers to prevent trespassing and reduce hazards to children and other pedestrians.

PUBLIC SERVICES: Construction impact on school commuting routes (PEIR, p. 4.9-4)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: The majority of the Project components involve construction of storm drains, catch basins, and other structures within roadways. During construction of these structures, temporary road or lane closures may be required, which may cause students to take less direct routes when commuting to school. Construction vehicles may also cause traffic delays within the Project area and affect the on-time performance of school buses. (PEIR, p. 4.9-4.) Consultation with LAUSD will allow the Transportation Branch to determine whether it needs to reroute buses to avoid these impacts. Thus, with implementation of the following mitigation, impacts on school commuting routes would be reduced to less than significant levels:

P-12 The Project Manager or designee will notify the LAUSD Transportation Branch and the St. Patrick's School of the expected start and ending dates for various portions of the project that may affect traffic through the areas and any potential impact on existing school bus routes.

TRAFFIC: Temporary impact on traffic in the Project area from construction vehicles and equipment (PEIR, pp. 4.11-26 to 49)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: During Project construction, a number of vehicles would be traveling to and from each Project site, including trucks delivering materials to the site, trucks transporting dredge and/or other waste material away from the site, and construction workers' vehicles commuting to and from the site. (See PEIR, pp. 4.11-26 through 48.) Based on an analysis conducted by a traffic engineer, construction of the following Project components were determined to result in a significant increase in traffic in the Project area: Vulcan Gravel Processing Plant (PEIR, p. 4.11-30), Tuxford Green (PEIR, p. 4.11-31), Sun Valley Middle School (PEIR, p. 4.11-32), Roscoe Elementary School (4.11-36), Strathern Pit (PEIR, p. 4.11-41), Power Line Easement (PEIR, pp. 4.11-43 and 44), and Storm Drains (PEIR, pp. 4.11-46 and 47). Advance planning of construction traffic routes, times, and traffic controls in a traffic management plan will result in avoidance of this impact. Thus, with implementation of the following mitigation measure (at all Project components except Onsite BMPs and Tree Planting & Mulching), impacts associated with increased traffic during Project construction would be reduced to less than significant levels:

T-1 A construction traffic management plan shall be developed for each project site that will include but not be limited to such measures as designated haul routes for construction-related traffic (e.g., construction equipment, pickup and dump trucks, and other material delivery trucks), travel time restrictions for construction-related traffic to avoid

weekday peak periods on selected roadways, designated site access locations, driveway turning restrictions, temporary traffic controls and/or flaggers, and designated parking/staging locations for workers and equipment.

TRAFFIC: Temporary impact on traffic in the Project area from construction activities in street rights-of-way (Storm Drains, Street Storage, catch basins, etc.) (PEIR, pp. 4.11-26 to 49)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: Project components that would involve excavation within street rights-of-way include Storm Drains, Street Storage, and Strathern Pit. Potential impacts of construction within street rights-of-way include lane closures, detours, driveway blockages, loss of parking, and disruptions to traffic, transit, and pedestrian movements in the construction area. (PEIR, pp. 4.11-41 to 42, 4.11-45 to 47.) Advance planning of construction activities through, for example, avoidance of lane closures during peak commuting times, implementation of alternative access routes, and coordination with emergency services and public transportation will reduce the impact. Thus, with implementation of the following mitigation, impacts associated with construction activities in the right-of-way of public streets for pipelines, catch basins, culverts, etc. would be reduced to less than significant levels.

T-2 A construction area traffic control plan and/or detour plan shall be prepared for each location where construction activities would encroach into the right-of-way of a public roadway. The plan would include, but not be limited to such features as warning signs, lights, barricades, cones, lane closures, and restricted hours during which lane closures would not be allowed; e.g., 6:00 to 9:00 a.m. and 3:00 to 6:00 p.m., or as directed by the affected public agency (City of Los Angeles Department of Transportation for most locations).

T-3 Provide advance notification to affected property owners, businesses, residents, etc. of possible driveway blockages or other access obstructions and implement alternate access and parking provisions where necessary. (Continued on following page)

T-4 Provide alternative pedestrian and bicycle access/circulation routes where existing facilities such as sidewalks, crosswalks, and bike lanes would be obstructed.

T-5 Coordinate with emergency service providers (police, fire, and ambulance/paramedic agencies) prior to construction to provide information regarding lane closures, construction schedules, driveway blockages, etc. and to develop a plan to maintain or accommodate essential emergency access routes; e.g., plating over excavations, use of detours, etc.

T-6 Coordinate with public transit agencies (e.g., MTA) to provide information regarding lane closures, bus stop disruptions, etc. and to designate alternate pick-up/drop-off locations if appropriate.

T-7 As necessary, obtain a transportation permit from Caltrans for transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways.

UTILITIES: Potential interference with existing utilities within street rights-of-way from construction of Storm Drains, Street Storage, catch basins, etc. (PEIR, p. 4.12-3)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: Various utility lines are located within existing street rights-of-way in the Project area. Project components that would involve excavation within street rights-of-way include Storm Drains, Street Storage, and Strathern Pit. Utilities that may be affected by construction of these Project components include water, sewer, electricity, gas, oil, telephone, and cable, and railroad signal cables or conduits within SCRRA rail rights-of-way. Preliminary evaluation has indicated that sewer lines may need to be relocated for construction of proposed storm drains. If affected utilities in the Project area are not identified prior to construction, damage and temporary disruption to those lines and associated services could occur. Damage to major utility lines could result in significant impacts on the service area. With coordination and notification with utility service providers, as outlined in the following mitigation, construction impacts on underground utilities would be reduced to less than significant levels (PEIR, p. 4.12-3):

U-1 During the preliminary design phase of each project component, the utility service providers will be consulted to identify existing and proposed buried facilities in affected roadways and to determine which utilities require relocation and which can be avoided. If relocation is required, the appropriate utility service provider will be consulted to sequence construction activities to avoid or minimize interruptions in service.

U-2 If utility service disruption is necessary, residents and businesses in the project area will be notified a minimum of two to four days prior to service disruption through local newspapers, direct mailings to affected parties, or public posting of notices.

U-3 The contractor will be required to excavate around utilities, including hand excavation as necessary, to avoid damage and to minimize interference with safe operation and use. Hand tools must be used to expose the exact location of buried gas or electric utilities.

UTILITIES: Operational impact on power line towers from stormwater infiltration at Valley Steam Plant and Power Line Easement (PEIR, p. 4.12-5)

Finding: Changes or alternatives have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: The Valley Steam Plant and Power Line Easement components of the Project involve construction of stormwater infiltration facilities near power line towers. If stormwater infiltration saturates the soil surrounding the towers and affects the stability of the power line towers, it could result in a significant impact on the electricity infrastructure. (PEIR, p. 4.12-5.) A geotechnical study may show that, to avoid the impact, drywells allowing for

deeper infiltration and avoidance of surface soil saturation, or lining of a part of the basins closes to the power lines, will avoid the impact. Thus, with implementation of the following mitigation, impacts on power line towers at these sites would be reduced to less than significant levels:

U-6 During preliminary design of Valley Steam Plant and Power Line Easement, a geotechnical investigation will be conducted to assess the characteristics and stability of the soil around the power line towers. If results of the investigation indicate that stormwater infiltration may saturate the soil and affect the stability of the towers, the following changes would be incorporated into the site design:

- For the Valley Steam Plant component, the proposed retention basins would be sited to avoid the towers, if possible, or a series of drywells would be constructed so that water would be infiltrated deeper into the ground to avoid saturation of surface soils.
- For the Power Line Easement component, a series of drywells would be constructed so that water would be infiltrated deeper into the ground to avoid saturation of surface soils.
- Alternatively, for either the Power Line Easement or Valley Steam Plant components, a liner may be installed along the sideslope of the basin closest to the power line towers to prevent infiltration. (The liner would cover only a small portion of the infiltration basin.)

2.3 Impacts That Remain Significant And Unavoidable After The Imposition Of Feasible Mitigation Measures

Pursuant to State CEQA Guidelines Section 15091, the following are the impacts of the Project which cannot be fully mitigated to a less than significant level.

AIR QUALITY: Construction NOx emissions for Cal Mat Pit, Parking Lot on Sherman, Power Line Easement, Sheldon Pit, Storm Drains, Strathern Pit, Street Storage, and Vulcan Gravel Processing Plant (PEIR, pp. 4.1-8 to 12)

Finding: Specific economic, legal, social, technological or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or Project alternatives identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: Construction of the following individual Project components would result in exceedance of SCAQMD thresholds for NOx: Cal Mat Pit, Parking Lot on Sherman, Power Line Easement, Sheldon Pit, Storm Drains, Strathern Pit, Street Storage, and Vulcan Gravel Processing Plant. (PEIR, pp. 4.1-8 to 9.)

These Project components with estimated emissions that exceed SCAQMD thresholds utilized by the County are large sites, and involve more extensive use of construction equipment than other components. Sheldon Pit, for example, involves a site that is over 80 acres and would require a large number of heavy earth moving equipment in the initial regrading phase (estimated as 11 scrapers and 3 bulldozers over three quarters). The impact of Project construction on air quality, while temporary, is significant for these Project components. (*Ibid.*)

Mitigation Measures A-11, A-12, and A-13 will be implemented during construction of all Project components in order to reduce tailpipe emissions (including CO, ROC, NOx, SOx, and PM10) from worker commutes, use of delivery and work trucks, and use of construction equipment through reduced unnecessary idling and trips, and improperly tuned equipment. However, Mitigation Measures A-11, A-12, and A-13 are limited in their effectiveness to reduce tailpipe emissions. (PEIR, p. 4.1-11.)

A-11 Prohibit all vehicles from idling in excess of 10 minutes, both on and off-site.

A-12 Maintain construction equipment in proper tune.

A-13 Encourage contractors to establish trip reduction plans. The goal of these plans will be to achieve a 1.5 average vehicle ridership (AVR) for construction employees.

To further reduce tailpipe emissions, implementation of Mitigation Measure A-14 will be considered at the time of construction of individual Project components. The majority of the construction emissions, particularly for NOx, are associated with tailpipe emissions from diesel-fueled construction equipment. Using construction equipment with alternative fuel(s) (Mitigation Measure A-14) can achieve high reduction efficiency for tailpipe emissions. The approximate NOx emissions reduction rates of various alternative fuels are: 60 percent for compressed natural gas (CNG), 10 percent for emulsified diesel fuel, and 2 to 10 percent for biodiesel fuel. However, use of construction equipment with alternative fuel(s), while effective, may not be applicable to all Project components. Some of the Project components are expected to require a large number of heavy construction equipment. Limited equipment availability and high costs may make it infeasible to use a large fleet of construction equipment with alternative fuel(s). (PEIR, pp. 4.1-11 to 12.)

A-14 Select construction equipment with low pollutant emissions and high energy efficiency. Factors to consider include model year and alternative fuels (e.g., compressed natural gas, biodiesel, emulsified diesel, methanol, propane, and butane).

Accordingly, air quality emissions are reduced to the extent feasible, but not below a level of significance.

BIOLOGICAL RESOURCES: Construction impacts on special status species whose presence is not known but could not be excluded from New Park on Wentworth (PEIR, pp. 4.2-15 and 16)

Finding: Specific economic, legal, social, technological or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or Project alternatives identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: Habitat and substrate at New Park on Wentworth have limited potential to support the southern tarplant, San Fernando Valley spineflower, and slender-horned spineflower, and have a low potential to support Nevin's barberry, Plummer's mariposa lily, mesa horkelia, and Davidson's bush mallow. (Lewis' evening primrose also has a low potential

to be present at this site. However, Project impacts on Lewis' evening primrose, if any, would be considered less than significant since the species does not have a state or federal status and is a CNPS status 3 plant.) (PEIR, p. 4.2-15.)

In addition, habitat at New Park on Wentworth has a very limited potential to support coastal California gnatcatcher and San Diego black-tailed jackrabbit, a limited potential to support silvery legless lizard, and has a low potential to support orange-throated whiptail and San Diego horned lizard. (PEIR, p. 4.2-16.)

Prior to or during the design phase of New Park on Wentworth, focused surveys will be conducted to determine the presence or absence of these sensitive plant and wildlife species. If the surveys concluded that one or more of these sensitive species is present at the site, and if Project construction resulted in a substantial adverse effect on the species (including disturbance of breeding behavior by generation of construction noise), this could be considered a significant impact. Impacts on the sensitive species identified above, if present, could be significant and unmitigable even if permitted by the USFWS and CDFG due to the fact that the impact would result in, at least a temporary, reduction of the overall population of those species. Significant unavoidable impacts to biological resources are possible, but not expected, and will be fully evaluated in subsequent analyses as described in Mitigation Measure B-3 below. After completion of additional surveys, subsequent CEQA documentation may be prepared to address impacts on biological resources at New Park on Wentworth. (PEIR, p. 4.2-16.) If sensitive resources are found, Project re-design to avoid and protect the sensitive species will be the first consideration. However, depending on the location of sensitive resources at the sites, if any, Project redesign that avoids the biological resources while still meeting the flood control objective of the Project component may be infeasible.

B-3 A qualified biologist will conduct focused surveys at New Park on Wentworth for the following special status plant and wildlife species at the appropriate time of the year in accordance with appropriate survey protocols:

- Plants. southern tarplant, San Fernando Valley spineflower, slender-horned spineflower, Nevin's barberry, Plummer's mariposa lily, mesa horkelia, and Davidson's bush mallow
- Wildlife. silvery legless lizard, orange-throated whiptail, San Diego horned lizard, coastal California gnatcatcher, and San Diego black-tailed jackrabbit

If any special status species are identified, the proposed facilities will be designed and/or sited to avoid or minimize disturbance and loss of the species during construction. However, depending on the location of sensitive resources at the sites, if any, project redesign that avoids the biological resources while still meeting the flood control objective of the project component may be infeasible. Therefore, if avoidance is not feasible, restoration and/or rehabilitation as described in Mitigation Measure B-1 will be implemented.

Additionally, if impacts on a federal or state-listed threatened or endangered species cannot be avoided, USFWS and/or CDFG will be consulted regarding permits required under FESA and/or CESA. All necessary federal and state approvals will be obtained prior to the implementation of construction activities that would impact a federal or state-listed threatened or endangered species and the project will be constructed, operated, and maintained in conformance with the terms and conditions of these approvals.

BIOLOGICAL RESOURCES: Construction impacts on sensitive species whose presence is not known but could not be excluded from Cal Mat Pit, Sheldon Pit, Strathern Pit, and Vulcan Gravel Processing Plant (PEIR, pp. 4.2-15 to 17)

Finding: Specific economic, legal, social, technological or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or Project alternatives identified in the Final PEIR. (State CEQA Guidelines Section 15091).

Facts Supporting the Finding: Habitat and substrate at Cal Mat Pit, Vulcan Gravel Processing Plant, Sheldon Pit, and Strathern Pit have a limited potential to support the southern tarplant, San Fernando Valley spineflower, slender-horned spineflower, and Los Angeles sunflower, and have a low potential to support Nevin's barberry, Plummer's mariposa lily, mesa horkelia, and Davidson's bush mallow. (Lewis' evening primrose also has a low potential to be present at these sites. However, Project impacts on Lewis' evening primrose, if any, would be considered less than significant since the species does not have a state or federal status and is a CNPS status 3 plant.) (PEIR, pp. 4.2-15 and 16.)

In addition, habitat at Cal Mat Pit, Vulcan Gravel Processing Plant, Sheldon Pit, and Strathern Pit has a limited potential to support silvery legless lizard, and southwestern pond turtle, coastal California gnatcatcher, and San Diego black-tailed jackrabbit, and has a low potential to support orange-throated whiptail, San Diego horned lizard, and least Bell's vireo. (PEIR, p. 4.2-16.)

Since access was not permitted, onsite surveys to identify special status plant and wildlife species could not be conducted at these sites. (PEIR, pp. 4.2-1 and 2.) Prior to or during the design phase of Cal Mat Pit, Vulcan Gravel Processing Plant, Sheldon Pit, and Strathern Pit, focused surveys will be conducted to determine the presence or absence of these sensitive wildlife species. If the surveys concluded that one or more of these sensitive species is present at the site, and if Project construction resulted in a substantial adverse effect on the species (including disturbance of breeding behavior by generation of construction noise), this could be considered a significant impact. Impacts on the sensitive species identified above, if present, could be significant and unmitigable even if permitted by the USFWS and CDFG due to the fact that the impact would result in, at least a temporary, reduction of the overall population of those species. Significant unavoidable impacts to biological resources are possible, but not expected, and will be fully evaluated in subsequent analyses as described in Mitigation Measure B-4 below. After completion of additional surveys, subsequent CEQA documentation may be prepared to address impacts on biological resources at Cal Mat Pit, Vulcan Gravel Processing Plant, Sheldon Pit, and Strathern Pit. If sensitive resources are found, Project re-design to avoid and protect the sensitive species will be the first consideration. However, depending on the location of sensitive resources at the sites, if any, Project redesign that avoids the biological resources while still meeting the flood control objective of the Project component may be infeasible. (PEIR, pp. 4.2-15 and 16.)

B-4 Prior to construction of Vulcan Gravel Processing Plant, Sheldon Pit, Cal Mat Pit, and Strathern Pit components, onsite field surveys will be conducted at the appropriate

time of the year (approximately mid-April to mid-June) to confirm the potential for special status plant and wildlife species to occur on these sites:

- Plants. southern tarplant, San Fernando Valley spineflower, slender-horned spineflower, Los Angeles sunflower, Nevin's barberry, Plummer's mariposa lily, mesa horkelia, and Davidson's bush mallow
- Wildlife. silvery legless lizard and southwestern pond turtle, orange-throated whiptail, San Diego horned lizard, least Bell's vireo, coastal California gnatcatcher, and San Diego black-tailed jackrabbit

If the potential is confirmed for one or more special status species to occur, a qualified biologist will conduct focused surveys for those species in accordance with appropriate survey protocols at the appropriate time of the year. If any special status species are identified during the focused surveys, the proposed facilities will be designed and/or sited to avoid or minimize disturbance and loss of the species during construction. However, depending on the location of sensitive resources at the sites, if any, project redesign that avoids the biological resources while still meeting the flood control objective of the project component may be infeasible. Therefore, if avoidance is not feasible, restoration and/or rehabilitation as described in Mitigation Measure B-2 will be implemented.

Additionally, if impacts on a federal or state-listed threatened or endangered species cannot be avoided, USFWS and/or CDFG will be consulted regarding permits required under FESA and/or CESA. All necessary federal and state approvals shall be obtained prior to the implementation of construction activities that would impact a federal or state-listed threatened or endangered species.

2.4 Summary of Findings

The following significant environmental impacts have been identified in the PEIR and will require mitigation as set forth in Section 2.3 of these Findings but cannot be mitigated to a level less than significant:

- Air Quality: Air quality degradation due to construction NOx emissions for Cal Mat Pit, Parking Lot on Sherman, Power Line Easement, Sheldon Pit, Storm Drains, Strathern Pit, Street Storage, and Vulcan Gravel Processing Plant is considered a significant unavoidable impact.

- Biological Resources: If any special status species are found at New Park on Wentworth during subsequent focused surveys and Project redesign that avoids the biological resources while still meeting the flood control objective of the Project component is infeasible, construction impacts on special status species is considered a significant unavoidable impact.

- Biological Resources: If any special status species are found at Cal Mat Pit, Sheldon Pit, Strathern Pit, and/or Vulcan Gravel Processing Plant during subsequent surveys and Project redesign that avoids the biological resources while still meeting the flood

control objective of the Project component is infeasible, construction impacts on special status species is considered a significant unavoidable impact.

SECTION 3 – SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The State CEQA Guidelines (Sections 15126.2 and 15127) require that a draft EIR on a public agency plan must analyze the extent to which the proposed project's primary and secondary effects will commit nonrenewable resources to uses that future generations will probably be unable to reverse.

No significant, irreversible impacts have been identified for the Project. Construction of the Project components and, to a lesser extent Project maintenance, would result in the consumption of nonrenewable vehicle and equipment fuels. However, the volume of this fuel use is considered limited and less than significant. Additionally, mitigation measure A-14 will be considered by the County during the implementation of components with more extensive construction. This measure calls for the use of alternative fuel vehicles and equipment to the extent feasible and would reduce the unavoidable consumption of traditional fossil fuels from implementation of the Project. (PEIR, pp. 6-1 to 2.)

SECTION 4 – GROWTH-INDUCING IMPACTS

State CEQA Guidelines Section 15126.2(d) states that a project may have a growth-inducing effect if it would:

- foster economic or population growth or the construction of additional housing, either directly or indirectly; or
- remove obstacles to population growth; or
- require the construction of additional community service facilities that could cause significant environmental effects; or
- encourage and facilitate other activities that would significantly affect the environment.

The Project does not involve construction of new homes or businesses and does not include construction of new, potentially growth-inducing, infrastructure such as roads or potable water or wastewater systems. However, the Project does include infiltration of stormwater, which will increase the volume of available groundwater. Since no new potable water treatment or distribution systems are proposed, this element of the Project is not considered growth inducing. The Project would provide flood control benefits to areas that have already been developed with residential, commercial, and industrial uses. Therefore, it would not result in the elimination of obstacles to growth. No growth inducing impacts would occur. (PEIR, pp. 6-3 to 4.)

SECTION 5 – ALTERNATIVES

The Board of Supervisors hereby declares that it has considered and rejected as infeasible the alternatives identified in the PEIR and described below. CEQA requires that an EIR evaluate a range of reasonable alternatives to a project, or to the location of the project, which would

feasibly obtain most of the basic project objectives but would avoid or substantially lessen any of the significant effects of the project. (State CEQA Guidelines Section 15126.6.) The "No Project" alternative must be evaluated, and if it is the environmentally superior alternative, another environmentally superior alternative must be identified among the other alternatives. (State CEQA Guidelines Section 15126.6(e).)

The PEIR identified the objectives for the Project as:

1. Reduce local flooding in the project area (primary objective)
2. Increase water conservation (secondary objective)
3. Increase recreational opportunities (secondary objective)
4. Increase wildlife habitat (secondary objective)
5. Improve water quality (secondary objective)
6. Provide additional environmental benefits (e.g., air quality and energy conservation) (secondary objective)
7. Increase multiple agency participation (secondary objective)

In addition to the Project, the PEIR evaluated three other alternatives. In summary, the No Project alternative does not have the beneficial effects of the Project or meet Project objectives. The 9250 Project alternative does not avoid the significant air quality construction impact of the Project and does not meet all project objectives or provide as many environmental benefits as the Project. The Boulevard Pit alternative would not provide any local flood control benefits for the watershed and would have an adverse impact on the local availability of mineral resources. Therefore, the Project is considered the environmentally superior project as compared to the No Project, 9250 Project, and Boulevard Pit alternatives. (See PEIR, section 7.)

No Project Alternative

Description: Nine of the seventeen Project components involve use of publicly owned properties with existing facilities (schools, parks, street rights-of-way, and other city properties). Under the No Project alternative, these sites and facilities are expected to continue current usage and remain essentially the same as under existing conditions. Two Project components (Onsite BMPs and Tree Planting & Mulching) are proposed as voluntary community involvement programs at existing residential, commercial, and industrial properties. Under the No Project alternative, these properties are expected to continue current usage and remain essentially the same as under existing conditions. Six Project components involve use of privately held properties. (PEIR, p. 7-3.) Based on zoning and land use designations, possible future uses of these Project component sites in the absence of the Project include a parking lot, single-family residential development, parks, and industrial uses. (PEIR, Table 7-1.)

Finding: The Board of Supervisors finds that the "No Project" alternative is infeasible because it fails to meet any Project objectives or provide the environmental benefits of the Project (State CEQA Guidelines Section 15126.6.)

Supporting Explanation: Under the No Project alternative, impacts related to construction of the proposed stormwater management facilities would not occur. Construction-related impacts

on air quality, noise, and traffic could result from implementation of other projects on these sites but the level of these impacts is unknown. Depending on the extent of new development on these sites, if any, the significant construction-related impacts on air quality associated with the Project could be avoided. (PEIR, p. 7-4.)

Under the No Project alternative, the Sun Valley area would continue to lack stormwater management facilities. Local flooding currently experienced within the watershed would not be remedied. Similarly, other benefits of the Project (i.e., water conservation (from stormwater reuse/infiltration), improved surface water quality (from stormwater treatment), creation of wildlife habitat (from wetlands creation), air quality improvement (from tree planting), and energy conservation (from tree planting and mulching) would not result. Thus, this alternative does not meet most of the basic Project objectives. Without the Project, new recreational facilities might eventually be constructed at Cal Mat Pit and Sheldon Pit. However, the total increase in recreational resources would be larger under the Project and would be implemented sooner. (PEIR, pp. 7-4 to 5.)

9250 Project Alternative

Description: In 1970, LACDPW proposed Project 9250, which consisted of a system of storm drains throughout the Sun Valley Watershed. A Draft EIR was prepared in 1995 (LACDPW, 1995) for Project 9250. However, that project was never implemented primarily due to lack of funding and community support. Project 9250 proposed approximately 10 miles of storm drains, including 7 miles of trunk drain and 3 miles of laterals. The alignment and lengths of the storm drains proposed under Project 9250 are similar to those proposed under the Project. However, the dimensions of the pipes of the storm drains (width and depth) required by the Project would generally be smaller than that of Project 9250. (PEIR, p. 7-5.)

Finding: The Board of Supervisors finds that the 9250 Project Alternative is infeasible because it fails to meet some of the basic objectives of the Project, does not avoid or substantially lessen some of the significant effects of the Project, or provide as many environmental benefits as the Project. (State CEQA Guidelines Section 15126.6.)

Supporting Explanation: The Draft EIR prepared for Project 9250 concluded that the proposal would have significant short-term environmental effects related to traffic and circulation, air quality, and emergency access (LACDPW, 1995). Therefore, the significant construction-related impacts on air quality associated with the Project could not be avoided with implementation of the Project 9250 alternative. (PEIR, p. 7-5.)

Since Project 9250 would be constructed within existing streets, significant impacts on cultural and/or biological resources would not occur. Therefore, implementation of this alternative would avoid the impacts on these resources identified for the Project (potential but unknown buried archaeological resources, potential historic machinery, refuse, or structures at Strathern Pit, Cal Mat Pit, and Sheldon Pit; potential but unknown sensitive biological resources at Cal Mat Pit, Sheldon Pit, Strathern Pit, Vulcan Gravel Processing Plant, and New Park on Wentworth). However, mitigation has been identified to reduce these impacts (Sections 4.2.7 and 4.3.4). (PEIR, p. 7-5.)

While the local flood control benefits achieved by Project 9250 would be similar to the Project, the majority of the other beneficial impacts related to the Project would not occur, and thus Project 9250 does not meet some of the basic Project objectives. Construction of storm drains alone would not increase water conservation, improve surface water quality, add recreational facilities, improve wildlife habitat, conserve energy, or improve air quality. However, Project 9250 would increase flows carried by the Los Angeles River and thereby intensify flooding risk to downstream communities along the Los Angeles River corridor. It would also convey stormwater runoff directly to the River and eventually the Pacific Ocean without any treatment for water quality improvement. Since all stormwater from the Project area does not currently reach the River or Ocean, implementation of Project 9250 would, to some degree, increase the overall pollutant load to these waterbodies. (PEIR, pp. 7-5 to 6.)

Boulevard Pit Alternative (Substitution for Sheldon Pit)

Description: This alternative involves substituting Boulevard Pit for one of the Project components – Sheldon Pit and Tujunga Wash Transfer – which is included in Alternative 2. Boulevard Pit is an actively mined gravel pit located just outside of Sun Valley Watershed, on the southern corner of San Fernando Road and Branford Street. The pit is owned and operated by Vulcan Materials Company. The gravel extracted from Boulevard Pit is transported by a conveyer belt to the Vulcan Gravel Processing Plant for processing. (PEIR, p. 7-6.)

Boulevard Pit has been considered as an alternative to Sheldon Pit for capturing and infiltrating some of the storm flows from Tujunga Wash. Both facilities are located adjacent to Tujunga Wash. The two gravel pits are also comparable in size and therefore stormwater storage capacity. (*Ibid.*)

Finding: The Board of Supervisors finds that the Boulevard Pit Alternative is infeasible because it fails to meet most of the basic Project objectives and does not avoid or substantially lessen most of the significant effects of the Project, and it has its own adverse impacts which outweigh its benefits. (State CEQA Guidelines Section 15126.6.)

Supporting Explanation: Under the Boulevard Pit alternative, construction-related impacts (less than significant noise and traffic and significant air quality) would be expected to be similar to the impacts described for Sheldon Pit. Since permission to access the site was not received from the property owners, on-foot survey of Boulevard Pit for biological and cultural resources was not conducted. Therefore, this alternative would also require mitigation to reduce potential cultural resources impacts to a less than significant impact. As with the other gravel pit sites proposed under the Project, impacts to sensitive biological resources are unknown but potentially significant even with implementation of feasible mitigation measures. (PEIR, p. 7-7.)

Gravel pits included in the Project (Cal Mat Pit, Sheldon Pit, and Strathern Pit) are exhausted gravel pits where gravel extraction operations have ceased. However, under this alternative, conversion of the actively mined Boulevard Pit into a stormwater retention basin would interrupt the ongoing gravel extraction activities. This would be considered an adverse impact on the local availability of mineral resources. (*Ibid.*)

Since Boulevard Pit is located outside of the watershed, it cannot be used to capture stormwater generated within Sun Valley Watershed via gravity. Therefore, unlike Sheldon Pit, it would not provide any local flood control benefits for the watershed. Assuming that Boulevard Pit would be designed similar to the Sheldon Pit component, other environmental benefits that are expected from the Sheldon Pit component would be similar. These benefits include water conservation from infiltration of Tujunga Wash flows, increase in recreational resources and wildlife habitat, and air quality improvements. (PEIR, p. 7-8.)

SECTION 6 – BALANCE OF PROJECT BENEFITS AGAINST SIGNIFICANT AND UNAVOIDABLE IMPACTS

The Board of Supervisors hereby declares that, pursuant to Public Resources Code Section 21081(b) and State CEQA Guidelines Section 15093, the Board of Supervisors has balanced the economic, legal, social, technical, and other benefits of the Project against any unavoidable environmental impacts in determining whether to approve the Project. If the benefits of the Project outweigh the unavoidable adverse environmental impacts, those impacts may be considered "acceptable." (State CEQA Guidelines Section 15093.)

The Board of Supervisors hereby declares that the PEIR has identified and discussed significant effects which may occur as a result of the Project. With the implementation of the mitigation measures discussed in the PEIR, the Project effects can be mitigated to less than significant levels except for unavoidable significant impacts on air quality and biological resources, as discussed in Section 2.3 of these Findings. The Board of Supervisors hereby declares that it has made a reasonable and good faith effort to eliminate or substantially mitigate the potential impacts resulting from the Project.

STATEMENT OF OVERRIDING CONSIDERATION

The Board of Supervisors hereby declares that, having reduced the adverse significant environmental effects of the Project to the extent feasible by adopting the proposed mitigation measures, having considered the entire administrative record on the Project, and having weighed the benefits of the Project against its unavoidable adverse impacts, the Board of Supervisors has determined that the following social, economic, legal and environmental benefits of the Project outweigh the potential unavoidable adverse impacts and render those potential adverse environmental impacts acceptable, and adopts the following statement of overriding considerations:

- The key beneficial impact of the Project is a reduction in flooding. The proposed stormwater retention facilities would substantially reduce the amount of runoff that flows into the local streets and contributes to flooding by increasing runoff retention capacity in the Project area by up to approximately 1,900 acre-feet. In addition to reducing local flooding, the proposed retention facilities will result in a reduction in peak flow rates entering the Los Angeles River (by up to approximately 2,000 cubic feet per second during a capital storm), a beneficial impact on downstream flooding.

- Construction of the proposed stormwater retention facilities would substantially reduce the amount of runoff currently discharged to the River from the Project area (by approximately 2,000 acre-feet per year). In addition to providing flood control, runoff retention would eliminate the stormwater pollutants currently discharged to the Los Angeles River a beneficial impact on water quality. This would contribute substantially to the City of Los Angeles' efforts to reduce non-point sources of pollution and meet existing and future TMDLs for the Los Angeles River.
- The stormwater runoff captured by the proposed retention facilities (approximately 2,000 acre-feet per year and up to 8,000 acre-feet per year with Tujunga Wash Diversion under the Sheldon Pit Project component) would be used for groundwater recharge or replacement of existing uses that do not require potable water (i.e., landscape irrigation and gravel processing), which would have a beneficial impact on the existing local water supply.
- Once construction is complete, the Project would have beneficial impacts on biological resources by providing additional or enhanced vegetation and habitats in the Project area. The greatest potential for creation of wildlife habitat exists at the Project components involving restoration of the gravel pits (i.e., Sheldon Pit, Cal Mat Pit, and Strathern Pit) due to their large sizes. At Cal Mat Pit and Strathern Pit, lakes with permanent pools of water are proposed as part of the stormwater retention facility. At Sheldon Pit and Strathern Pit, wetlands are proposed for stormwater treatment. These surface water features have the potential to attract wildlife, particularly waterfowl. Given the highly urbanized nature of the Project area, implementation of the Project components is anticipated to have a long-term benefit on wildlife. In addition, New Park on Wentworth and the Power Line Easement also provide opportunities for restoration of native habitat types.
- The Project includes components that would provide new recreational facilities and open space accessible to the residents in the Project area. Implementation of the Project would result in approximately 50 to 80 acres of additional park land and open space in the Project area, a beneficial impact on recreational resources.

The Board of Supervisors hereby declares that the foregoing benefits provided to the public through approval and implementation of the Project outweigh the identified significant adverse environmental impacts of the Project, which cannot be mitigated. The Board of Supervisors finds that each of the Project benefits outweighs the unavoidable adverse environmental effects identified in the PEIR and therefore finds those impacts to be acceptable.

SECTION 7 – CERTIFICATION OF EIR

Pursuant to Public Resources Code § 21081 and State CEQA Guidelines § 15090, the County of Los Angeles certifies that:

(1) The PEIR, State Clearinghouse No. 2002111051, is an accurate and objective statement that fully complies with CEQA, the State CEQA Guidelines and the County Environmental Guidelines;

(2) The PEIR was presented to the Board of Supervisors, which is the decisionmaking body for the County of Los Angeles, and the Board reviewed and considered the information in the PEIR prior to approving the Project; and

(3) The PEIR reflects the County of Los Angeles' independent judgment and analysis.

The County of Los Angeles Board of Supervisors further finds that no comments or responses to comments made during the review period for the PEIR, or any other public hearing on the Project, rise to the level of significant new information requiring recirculation or additional environmental review pursuant to State CEQA Guidelines § 15088.5.

SECTION 8 – MITIGATION MONITORING AND REPORTING PROGRAM

As required by Public Resources Code §21081.6, the Board, in adopting these Findings, also adopts a Mitigation Monitoring and Reporting Program, designated to ensure that, during Project implementation, the County, and other responsible parties will comply with the mitigation measures adopted in these Findings.

The Board hereby finds that the Mitigation Monitoring and Reporting Program, which is attached hereto and incorporated herein by reference as Exhibit A meets the requirements of Public Resources Code §21081.6.

SECTION 9 – PROJECT APPROVAL

Based upon the entire record before the Board of Supervisors, including the above findings and all written evidence presented to the County of Los Angeles, the County of Los Angeles hereby approves the Sun Valley Watershed Management Plan.

SECTION 10 – CUSTODIAN OF RECORD

The documents and materials that constitute the record of proceedings on which these Findings have been based are located at the County of Los Angeles Department of Public Works, 900 South Fremont Avenue, Alhambra, California. These records are maintained by the Watershed Management Division. This information is provided in compliance with Public Resources Code Section 21081.6.

SECTION 11 – STAFF DIRECTION

A Notice of Determination shall be filed with the County of Los Angeles within 5 working days of final Project approval.

County of Los Angeles
Department of Public Works

Programmatic Mitigation Monitoring and Reporting Program

for the

Sun Valley Watershed Management Plan

May 2004

MWH

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Introduction

This Mitigation Monitoring and Reporting Program (MMRP) has been developed to ensure implementation of the mitigation measures outlined in the Final Program Environmental Impact Report (Program EIR) (State Clearinghouse No. 2002111051) for the Sun Valley Watershed Management Plan. The MMRP has been prepared by the County of Los Angeles Department of Public Works (LACDPW), the lead agency for the Watershed Management Plan under the California Environmental Quality Act (CEQA), in conformance with Public Resources Code Section 21081.6 and CEQA Guidelines Section 15097.

Project Description Summary. The project area for the Watershed Management Plan is the Sun Valley Watershed in the communities of Sun Valley and North Hollywood, City of Los Angeles, Los Angeles County. The Watershed Management Plan is a blueprint for a multi-purpose flood control program to solve the local flooding problem in the project area while increasing water conservation, recreational opportunities, and wildlife habitat, and reducing stormwater pollution. The Watershed Management Plan consists of multiple components. The majority of the components involve construction and operation of stormwater storage and/or infiltration facilities (e.g., sedimentation and infiltration basins, underground storage tanks, and dry wells). The collected stormwater will be treated prior to groundwater recharge or reuse (irrigation or gravel washwater). Where appropriate, stormwater storage facilities will be designed to provide recreational facilities and/or wildlife habitat areas. In addition, catch basins and storm drains are proposed to collect and convey runoff and reduce flows carried on street surfaces.

Second-Tier CEQA Documentation. Various components of the Watershed Management Plan are planned for implementation over the next 10 years, beginning in 2004. As individual components are proposed for implementation, the mitigation measures in this MMRP may be modified and/or additional mitigation measures may be identified in second-tier CEQA documentation, if any. The Program EIR and this MMRP will serve as the foundation for any future second-tier CEQA documentation. Prior to implementation of any individual component, a project-specific MMRP will be prepared.

Mitigation Monitoring and Reporting Responsibility. LACDPW will coordinate with other agencies and parties for implementation of the Watershed Management Plan components. Depending on the project component, an agency other than LACDPW (e.g., Los Angeles Department of Water and Power or Los Angeles Unified School District) may assume the primary responsibility for implementation of the MMRP at a specific location.

Organization of the MMRP. This MMRP presents the mitigation measures by project phase (design, pre-construction, construction, or post-construction). (Note: Some mitigation measures apply to more than one phase.) For each mitigation, the applicable project component(s), the party responsible for implementing the measure, the agency responsible for mitigation monitoring, and the monitoring method are identified. A line for documentation of compliance is also provided.

Section 1 Design Phase

1.1 BIOLOGICAL RESOURCES

Mitigation Measure B-1 Design Phase

The existing coastal sage scrub vegetation at New Park on Wentworth will be incorporated into the park design, or the proposed facilities will be sited to avoid or minimize disturbance and loss of the vegetation during construction.

However, if avoidance is not feasible, the following will be implemented:

- Onsite top soil salvage and restoration and/or rehabilitation during construction and post-construction at New Park on Wentworth [during construction and post-construction phases – see **Sections 3.2 and 4.1**]; or
- Offsite restoration at other project component site(s) [post-construction phase – see **Section 4.1**]; or
- Offsite restoration outside of project component sites [post-construction phase – see **Section 4.1**]

Applicable Project Components:	**New Park on Wentworth**
Impact:	Construction impacts on the existing coastal sage scrub vegetation
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Review project plans and specifications for incorporation of above measures (avoidance or restoration/rehabilitation)
Documentation of Compliance:	Date: Initial:

Mitigation Measure B-2 Design Phase

Prior to construction of Vulcan Gravel Processing Plant, Sheldon Pit, Cal Mat Pit, and Strathern Pit, the sites will be surveyed in accordance with agency protocols at the appropriate time of the year for the presence or absence of high-value native vegetation and habitats, including special status vegetation and wetland or riparian vegetation. If high value vegetation/habitat types are identified, the proposed facilities will be designed and/or sited to avoid or minimize disturbance and loss of the vegetation and habitats during construction.

However, depending on the location of sensitive resources at the sites, if any, project redesign that avoids the biological resources while still meeting the flood control objective of the project component may be infeasible. For example, the large size of the stormwater retention/infiltration basins proposed for the gravel pit sites might preclude complete avoidance of sensitive biological resources. Therefore, if avoidance is not feasible, the following will be implemented:

(a) Onsite top soil salvage and restoration and/or rehabilitation at the project component site [during construction and post-construction phases – see **Sections 3.2 and 4.1**]; or

(b) Offsite restoration at other project component site(s) [post-construction phase – see **Section 4.1**]; or

(c) Offsite restoration outside of project component sites [post-construction phase – see **Section 4.1**]

Each acre of created wetlands that requires maintenance (e.g., sediment removal), and will be used to mitigate impacts to existing wetlands in (a) through (c) above, will be used for mitigation at a ratio of 2:1.

If wetland or riparian vegetation within the waters of the United States will be unavoidably impacted by project construction, USACE will be consulted regarding permits required under Clean Water Act Section 404. All necessary federal and state approvals (including coordination with CDFG and additional CEQA review) will be obtained prior to the implementation of construction activities.

Applicable Project Components:	**Vulcan Gravel Processing Plant, Sheldon Pit, Cal Mat Pit, and Strathern Pit**
Impact:	Construction impacts on sensitive habitat types whose presence is not known but could not be excluded
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Enforcement Agency	USACE (if jurisdictional wetlands would be impacted); CDFG if streambed alteration is required
Monitoring Method:	Review biological survey report Review project plans and specifications for incorporation of above measures (avoidance or restoration/rehabilitation)
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measure B-3 Design Phase

A qualified biologist will conduct focused surveys at New Park on Wentworth for the following special status plant and wildlife species at the appropriate time of the year in accordance with appropriate survey protocols:

- Plants: southern tarplant, San Fernando Valley spineflower, slender-horned spineflower, Nevin's barberry, Plummer's mariposa lily, mesa horkelia, and Davidson's bush mallow
- Wildlife: silvery legless lizard, orange-throated whiptail, San Diego horned lizard, coastal California gnatcatcher, and San Diego black-tailed jackrabbit

If any special status species are identified, the proposed facilities will be designed and/or sited to avoid or minimize disturbance and loss of the species during construction. However, depending on the location of sensitive resources at the sites, if any, project redesign that avoids the biological resources while still meeting the flood control objective of the project component may be infeasible. Therefore, if avoidance is not feasible, restoration and/or rehabilitation as described in Mitigation Measure B-1 will be implemented.

Additionally, if impacts on a federal or state-listed threatened or endangered species cannot be avoided, USFWS and/or CDFG will be consulted regarding permits required under FESA and/or CESA. All necessary federal and state approvals will be obtained prior to the implementation of construction activities that would impact a federal or state-listed threatened or endangered species and the project will be constructed, operated, and maintained in conformance with the terms and conditions of these approvals.

Applicable Project Components:	**New Park on Wentworth**
Impact:	Construction impacts on special status species whose presence is not known but could not be excluded
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Enforcement Agency	USFWS and/or CDFG, if any special status species are identified)
Monitoring Method:	Review focused survey report Review project plans and specifications for incorporation of above measures (avoidance or restoration/rehabilitation)
Documentation of Compliance:	Date: Initial:

Mitigation Measure B-4 Design Phase

Prior to construction of Vulcan Gravel Processing Plant, Sheldon Pit, Cal Mat Pit, and Strathern Pit components, onsite field surveys will be conducted at the appropriate time of the year (approximately mid-April to mid-June) to confirm the potential for special status plant and wildlife species to occur on these sites [Cross-reference with Mitigation Measure B-2]:

- Plants: southern tarplant, San Fernando Valley spineflower, slender-horned spineflower, Los Angeles sunflower, Nevin's barberry, Plummer's mariposa lily, mesa horkelia, and Davidson's bush mallow,
- Wildlife: silvery legless lizard and southwestern pond turtle, orange-throated whiptail, San Diego horned lizard, least Bell's vireo, coastal California gnatcatcher, and San Diego black-tailed jackrabbit

If the potential is confirmed for one or more special status species to occur, a qualified biologist will conduct focused surveys for those species in accordance with appropriate survey protocols at the appropriate time of the year. If any special status species are identified during the focused surveys, the proposed facilities will be designed and/or sited to avoid or minimize disturbance and loss of the species during construction. However, depending on the location of sensitive resources at the sites, if any, project redesign that avoids the biological resources while still meeting the flood control objective of the project component may be infeasible. Therefore, if avoidance is not feasible, restoration and/or rehabilitation as described in Mitigation Measure B-2 will be implemented.

Additionally, if impacts on a federal or state-listed threatened or endangered species cannot be avoided, USFWS and/or CDFG will be consulted regarding permits required under FESA and/or CESA. All necessary federal and state approvals shall be obtained prior to the implementation of construction activities that would impact a federal or state-listed threatened or endangered species.

Applicable Project Components:	**Vulcan Gravel Processing Plant, Sheldon Pit, Cal Mat Pit, and Strathern Pit**
Impact:	Construction impacts on special status species whose presence is not known but could not be excluded
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Enforcement Agency	USFWS and/or CDFG, if any special status species are identified)
Monitoring Method:	Review focused survey report Review project plans and specifications for incorporation of above measures (avoidance or restoration/rehabilitation)
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

1.2 CULTURAL RESOURCES

Mitigation Measure C-5 Design Phase

During the design phase, LACDPW will conduct on-site surveys to determine presence of original machinery, refuse and/or structures that date from the period of concern. If any are found, LACDPW will evaluate whether they are a historical resource using the criteria described in Section 15064.5(a) of the State CEQA Guidelines. If any equipment and/or structures are determined to be a historical resource, LACDPW will:

- Incorporate the artifact into design of the project component, or
- Remove and relocate the artifact to an appropriate location (i.e., museum, public library, or school), or
- Document with photographs and engineering drawings

Applicable Project Components:	Sheldon Pit, Cal Mat Pit, and Strathern Pit
Impact:	Construction impact on unknown but potential historical resources (machinery, refuse, or structures related to gravel mining operations)
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Review cultural survey report Review project plans and specifications for incorporation of above measures (incorporation into project design, removal and relocation, or documentation)
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

1.3 GEOLOGY AND SOILS

Mitigation Measure G-1 Design Phase

During detailed design, LACDPW will incorporate the recommendations of the geotechnical analysis, which will include optimum slope design for stability and safety, soil compaction or recompaction requirements, surface cover, and potentially other slope stabilizing measures.

Applicable Project Components:	Sheldon Pit, Cal Mat Pit, and Strathern Pit
Impact:	Impacts related to slope instability
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Review geotechnical report Review project plans and specifications for incorporation of recommendations outlined in geotechnical report
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

1.4 HAZARDS AND HAZARDOUS MATERIALS

Mitigation Measure H-1 Design Phase

During the detailed design phase of each project component (except Onsite BMPs, Tree Planting & Mulching, and Storm Drains), a Phase I Environmental Site Assessment (ESA) will be conducted to determine the site-specific potential for soil contamination. The Phase I ESA will be conducted in accordance with the latest version of the American Society of Testing and Materials (ASTM) 1527 "Standard Practice for Environmental Site Assessments: Phase I Environmental Assessment Process." This document outlines the customary practice for performing ESA's in the United States. Phase I ESA will consist of a review of site-specific documents and historical maps to determine past uses of the site, a site visit to visually inspect the property for signs of potential environmental contamination, and investigation of state and federal environmental regulatory databases (including those maintained by Regional Water Quality Control Board and Department of Toxic Substances Control) to identify recognized hazardous materials usage or spills. For project sites with infiltration, the boundary of the Phase I ESA will include parcels located within 500 feet of the project site boundary to identify active or abandoned landfills or other land uses with the potential for contaminated soils which would be incompatible with infiltration (to be cross-referenced with Mitigation Measure W-4; see Section 1.5).

- If the Phase I ESA concludes that there is no substantial potential for soil contamination, no further action would be required.
- If the Phase I ESA indicates that there is potential for soil to be contaminated, additional investigation (including soil sampling and analysis) will be conducted to determine the presence and extent of the contamination.
- If the proposed project would involve disturbance of soil in the contaminated area, soil would be removed and disposed of in compliance with applicable regulations at approved disposal sites [during construction phase – see **Section 3.4**].

Applicable Project Components:	**All project components except Onsite BMPs, Tree Planting & Mulching, and Storm Drains**
Impact:	Impacts related to potential soil contamination at project component sites
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Review Phase I ESA report (and reports from additional investigation, if any)
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measure H-2 Design Phase

During the detailed design phase of Sheldon Pit, Cal Mat Pit, and Strathern Pit, FAA Western Pacific Regional Office, Burbank Airport, and Whiteman Airport will be notified of the proposed land use change.

Applicable Project Components:	**Strathern Pit, Cal Mat Pit, and Sheldon Pit**
Impact:	Impacts related to potential increase in bird/wildlife air strike hazard at nearby airports
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Review documentation of correspondence
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measure H-3 Design Phase

LACDPW, or subsequent operator of the project component (if different), will consult and coordinate with the Greater Los Angeles Vector Control District (GLAVCD) during the detailed design, implementation, and operation phases of the following project components: Sheldon Pit, Strathern Pit, Cal Mat Pit, Power Line Easement, Valley Steam Plant, and Vulcan Gravel Processing Plant. Consultation and coordination with GLAVCD shall include the following actions:

- Consult with GLAVCD during the detailed design phase to incorporate design elements intended to minimize the mosquito production potential of the project component(s).
- [Post-construction phase – see **Section 4.3**] Regularly consult with GLAVCD.

Applicable Project Components:	**Sheldon Pit, Strathern Pit, Cal Mat Pit, Power Line Easement, Valley Steam Plant, and Vulcan Gravel Processing Plant**
Impact:	Public health impacts related to potential increase in mosquito habitat
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency) and GLAVCD
Monitoring Method:	Review project plans and specifications for incorporation of design elements, if any, for minimizing mosquito production
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

1.5 HYDROLOGY (SURFACE AND GROUND WATER QUALITY)

Mitigation Measure W-4 Design Phase

If the site-specific Phase I ESA [see **Mitigation Measure H-1, Section 1.4**] indicates that an active or closed landfill (either municipal solid waste or inert construction waste) is located within 500 feet from the project site boundary, a site-specific geotechnical study will be conducted to: 1) characterize the extent and composition of landfill materials; 2) determine whether the landfill materials are releasing methane; 3) and estimate the potential mounding effect from the proposed stormwater infiltration. The results of the geotechnical study will be incorporated into the project design to minimize the potential for project infiltration to result in interaction between infiltrated stormwater and landfill materials or to impact landfill gas releases, if any. Potential design modifications include siting the infiltration facilities away from the landfill and/or partially lining the facilities to direct infiltration away from the landfill. For sites with stormwater infiltration within 500 feet of an active or closed landfill, a groundwater monitoring program will then be developed and implemented to ensure that infiltration does not result in interaction between infiltrated stormwater and landfill materials or impact landfill gas releases. Infiltration would cease at any site where groundwater levels rose to within 10 feet of landfill materials [during post-construction phase – see **Section 4.4**].

Applicable Project Components:	All project components
Impact:	Groundwater hydrology impacts (Potential inundation of landfill material from stormwater infiltration)
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Review groundwater monitoring program
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measure W-5 Design Phase

As part of detailed design of the Strathern Pit component, LACDPW will coordinate with Los Angeles Bureau of Sanitation, LADWP, and ULARA Watermaster's office to evaluate the feasibility of using the Tujunga Spreading Grounds for stormwater infiltration. The evaluation will determine the amount of stormwater that can be infiltrated by the proposed project without adverse effects on landfill methane migration.

Applicable Project Components:	Strathern Pit
Impact:	Impacts related to the proposed use of Tujunga Spreading Grounds for infiltration of stormwater collected at Strathern Pit
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency), Los Angeles Bureau of Sanitation, LADWP, and ULARA Watermaster
Monitoring Method:	Review project design for inclusion of recommendations related to the maximum allowable volume of stormwater infiltration
Documentation of Compliance:	Date: _____ Initial: _____

1.6 UTILITIES

Mitigation Measure U-1 Design Phase

During the preliminary design phase, the utility service providers will be consulted to identify existing and proposed buried facilities in affected roadways and to determine which utilities require relocation and which can be avoided. If relocation is required, the appropriate utility service provider will be consulted to sequence construction activities to avoid or minimize interruptions in service. [See also **Mitigation Measures U-2 (Section 2.7) and U-3 (Section 3.8).**]

Applicable Project Components:	**All project components involving construction within street rights-of-way**
Impact:	Potential interference with existing utilities within street rights-of-way from construction of Storm Drains, Street Storage, catch basins, etc.
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Review documentation of correspondence Review project plans and specifications
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measure U-6 Design Phase

During preliminary design of Valley Steam Plant and Power Line Easement, a geotechnical investigation will be conducted to assess the characteristics and stability of the soil around the power line towers. If results of the investigation indicate that stormwater infiltration may saturate the soil and affect the stability of the towers, the following changes would be incorporated into the site design:

- For the Valley Steam Plant component, the proposed retention basins would be sited to avoid the towers, if possible, or a series of drywells would be constructed so that water would be infiltrated deeper into the ground to avoid saturation of surface soils.
- For the Power Line Easement component, a series of drywells would be constructed so that water would be infiltrated deeper into the ground to avoid saturation of surface soils.
- Alternatively, for either the Power Line Easement or Valley Steam Plant components, a liner may be installed along the sideslope of the basin closest to the power line towers to prevent infiltration. (The liner would cover only a small portion of the infiltration basin.)

Applicable Project Components:	**Valley Steam Plant and Power Line Easement**
Impact:	Operational impact on power line towers from stormwater infiltration
Party Responsible for Implementation:	LACDPW (or future designated lead agency) and LADWP
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency) and LADWP
Monitoring Method:	Review geotechnical report Review project plans and specifications for incorporation of above measures, as applicable
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Section 2 Pre-Construction

2.1 AIR QUALITY

Mitigation Measure A-10 Pre-Construction

Per SCAQMD Rule 403(f), large construction operations (greater than 100 acres of disturbed area or daily earth-moving or throughput volume of 10,000 cubic yards three times during the most recent 365-day period) will either 1) implement fugitive dust suppression measures as specified in Tables 1 and 2 of Rule 403 [available at: http://www.aqmd.gov/rules/rulesreg.html], or 2) prepare a fugitive dust emissions control plan and obtain approval from SCAQMD. [See also Mitigation Measures A-1 through A-9, **Section 3.1**]

Applicable Project Components:	**Sheldon Pit, Cal Mat Pit, and Strathern Pit** (potentially applicable)
Impact:	PM10 (fugitive dust) emissions during construction
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Enforcement Agency	SCAQMD
Monitoring Method:	Review plans and specifications for inclusion of fugitive dust suppression measures (Tables 1 and 2 of Rule 403) or measures from a fugitive dust emissions control plan (if any)
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measure A-13 Pre-Construction

Encourage contractors to establish trip reduction plans. The goal of these plans will be to achieve a 1.5 average vehicle ridership (AVR) for construction employees.

Applicable Project Components:	**All project components**
Impact:	Tailpipe emissions from construction (including NOx)
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Review plans and specifications for requirement to have trip reduction plans. Review trip reduction plans
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measure A-14 Pre-Construction

In order to reduce tailpipe emissions from construction equipment, implementation of the following measure will be considered at the time of construction of individual project components:

- Select construction equipment with low pollutant emissions and high energy efficiency. Factors to consider include model year and alternative fuels (e.g., compressed natural gas, biodiesel, emulsified diesel, methanol, propane, butane, and low sulfur diesel).

Applicable Project Components:	**All project components**
Impact:	Tailpipe Emissions from Construction (including NOx)
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Review project plans and specifications for requirement to consider construction equipment with lower emissions and higher energy efficiency.
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

2.2 BIOLOGICAL RESOURCES

Mitigation Measure B-5 Pre-Construction

If feasible, project activities with the potential to disturb native and non-native vegetation and man-made nesting structure shall take place outside of the breeding season (which generally runs from March 1 to August 31 and as early as February 1 for some raptors) for birds protected by the Migratory Bird Treaty Act.

If project activities must occur during the breeding season of birds covered by the MBTA, then beginning 30 days prior to construction, weekly bird surveys shall be arranged. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work at the site.

[During construction – see **Section 3.2**]: If a bird covered by the MBTA is detected on the site, then the nesting activity will be monitored to ensure that construction activities do not occur within 300 feet of the nest (500 feet for raptors) until the juvenile birds have fledged and no further nesting attempts are initiated.

Applicable Project Components:	**Vulcan Gravel Processing Plant, Sheldon Pit, Cal Mat Pit, Strathern Pit, and New Park on Wentworth**
Impact:	Construction impact on nesting birds protected by the Migratory Bird Treaty Act
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	If avoidance of breeding season is the selected mitigation measure, review project plans and specifications. If construction must occur during the breeding season, review pre-construction survey reports.
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

2.3 HYDROLOGY (SURFACE AND GROUND WATER QUALITY)

Mitigation Measure W-1 Pre-Construction

The construction contractor will develop and implement a Storm Water Pollution Prevention Plan (SWPPP) for all project components (except Onsite BMPs and Tree Planting and Mulching) that involve constructing, clearing, grading or excavation on areas over 1 acre in size. The following are possible measures to be incorporated into site-specific SWPPPs [to be implemented during construction phase – see **Section 3.5**]. Additional sample measures and guidelines for developing SWPPPs are available in California Stormwater Quality Association's Stormwater Best Management Practice Handbook – Construction (available at: http://www.cabmphandbooks.com/). Measures to reduce fugitive dust generated during construction (see Mitigation Measures A-1 through A-10, **Section 3.1**) will also minimize the potential for soil erosion.

- Install perimeter silt fences or hay bales.
- Stabilize soils through hydroseeding and use of soil stabilizers.
- Install temporary sedimentation basins.
- Conduct earth moving activities during the dry season (April through October), as feasible.
- Designate storage areas for construction materials, equipment, and maintenance supplies (e.g., fuels, lubricants, paints, solvents, adhesives) to keep these materials out of the rain and minimize contact with stormwater.
- Conduct regular inspections to ensure compliance with the SWPPP.

Applicable Project Components:	**All project components except Onsite BMPs, Tree Planting & Mulching involving constructing, clearing, grading or excavation on areas over 1 acre in size**
Impact:	Construction impacts on surface water quality related to soil erosion and use of equipment/vehicles
Party Responsible for Implementation:	Construction contractor; LACDPW (or future designated lead agency) must file NOI
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Enforcement Agency	Regional Board
Monitoring Method:	Review Storm Water Pollution Prevention Plan
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measure W-3 Pre-Construction

Prior to starting operation, LACDPW will coordinate with Waste Management Inc., the Regional Board, and ULARA Watermaster to develop a contingency plan that will be implemented in the event the groundwater levels at existing monitoring wells around Bradley Landfill reach the "alert level" of 745 feet msl. The contingency plan will outline actions to be taken if the "alert level" is reached (e.g., reduce or stop stormwater infiltration for a period of time until groundwater levels begin to fall).

Applicable Project Components:	**Sheldon Pit**
Impact:	Groundwater hydrology impacts (Potential inundation of landfill material from stormwater infiltration)
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency), Regional Board, and ULARA Watermaster
Monitoring Method:	Review contingency plan
Documentation of Compliance:	Date: Initial:

2.4 NOISE

Mitigation Measure N-3 Pre-Construction

For discrete project component sites, businesses and residences immediately adjacent to the construction site will be notified prior to the start of construction, e.g., via flyers. A toll free number for noise complaints will be included in this notification.

Applicable Project Components:	**All project components except Onsite BMPs, Tree Planting & Mulching, and Storm Drains**
Impact:	Construction noise impact on sensitive receptors
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Review notices and mailing lists
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measure N-4 Pre-Construction

Prior to the start of construction of the project components, the construction contractor will develop a site-specific noise mitigation plan based on an updated estimate of construction equipment and schedule for each project component. The objective of the mitigation plans will be to reduce noise levels to 75 dBA at the nearest residence and 67 dBA at school sites during project construction. The mitigation plans will identify potential mitigation measures, including installation of sound walls, sound curtains, and other temporary sound barriers; selection of quieter construction procedures and/or equipment; and noise monitoring to verify adherence to the identified mitigation measures.

Additional mitigation measures for construction at school sites (i.e., Roscoe Elementary School, Stonehurst Elementary School, and Sun Valley Middle School) will include the following: scheduling the noisier phases of construction on Saturdays, school vacation periods, and/or after regular class hours but before 9 p.m., as feasible; and maintaining ongoing communications with the schools' administrators to address any construction noise-related issues. Coordination with St. Patrick's school will also be conducted prior to the installation of storm drains near this location.

Applicable Project Components:	**All project components except Onsite BMPs, Tree Planting & Mulching, and Storm Drains**
Impact:	Construction noise impact on sensitive receptors
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Review plans and specifications for inclusion of noise mitigation measures outlined in the noise mitigation plan Review documentation of correspondence with school administrators
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

2.5 PUBLIC SERVICES

Mitigation Measures P-1 through P-4 and P-12 Pre-Construction

P-1 Prior to the start of construction, the fire stations serving the project area will be consulted to review phasing, road/lane closure, and detour plans and to determine fire and emergency medical response requirements.

P-2 The project will comply with all state and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, and Safety Plan located in the City of Los Angeles General Plan (C.P.C. 19708).

P-3 Prior to the start of construction, the North Hollywood Community Police Station and/or Foothill Community Police Station will be informed, as appropriate, of project-related lane and/or road closures and detour plans.

P-4 Investigate and implement traffic control measures capable of reducing the temporary adverse effects to police and emergency vehicle responses during project construction. Such measures may include the use of flagmen and posting "No Parking" signs along the affected area.

P-12 The Project Manager or designee will notify the LAUSD Transportation Branch and the St. Patrick's School of the expected start and ending dates for various portions of the project that may affect traffic through the areas and any potential impact on existing school bus routes.

Applicable Project Components:	**All project components involving construction within street rights-of-way**
Impact:	Construction impact on police and fire protection services and school commuting routes from temporary lane and/or road closures
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Review plans and specifications for requirement to contact relevant service providers Review documentation of correspondence with relevant service providers
Documentation of Compliance:	Project Component: _____ P-1 Date: _____ Initial: _____ P-2 Date: _____ Initial: _____ P-3 Date: _____ Initial: _____ P-4 Date: _____ Initial: _____ P-12 Date: _____ Initial: _____

2.6 TRAFFIC AND TRANSPORTATION

Mitigation Measure T-1 Pre-Construction

A construction traffic management plan shall be developed for each project site that will include but not be limited to such measures as designated haul routes for construction-related traffic (e.g., construction equipment, pickup and dump trucks, and other material delivery trucks), travel time restrictions for construction-related traffic to avoid weekday peak periods on selected roadways, designated site access locations, driveway turning restrictions, temporary traffic controls and/or flaggers, and designated parking/staging locations for workers and equipment.

Applicable Project Components:	**All project components except Onsite BMPs and Tree Planting & Mulching**
Impact:	Temporary impact on traffic in the project area from construction vehicles and equipment
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency) and City of Los Angeles
Monitoring Method:	Review plans and specifications for inclusion of measures outlined in the traffic management plan
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measures T-2 through T-6 Pre-Construction

T-2 A construction area traffic control plan and/or detour plan shall be prepared for each location where construction activities would encroach into the right-of-way of a public roadway. The plan would include, but not be limited to such features as warning signs, lights, barricades, cones, lane closures, and restricted hours during which lane closures would not be allowed; e.g., 6:00 to 9:00 a.m. and 3:00 to 6:00 p.m., or as directed by the affected public agency (City of Los Angeles Department of Transportation for most locations).

T-3 Provide advance notification to affected property owners, businesses, residents, etc. of possible driveway blockages or other access obstructions and implement alternate access and parking provisions where necessary.

T-4 Provide alternative pedestrian and bicycle access/circulation routes where existing facilities such as sidewalks, crosswalks, and bike lanes would be obstructed.

T-5 Coordinate with emergency service providers (police, fire, and ambulance/paramedic agencies) prior to construction to provide information regarding lane closures, construction schedules, driveway blockages, etc. and to develop a plan to maintain or accommodate essential emergency access routes; e.g., plating over excavations, use of detours, etc.

T-6 Coordinate with public transit agencies (e.g., MTA) to provide information regarding lane closures, bus stop disruptions, etc. and to designate alternate pick-up/drop-off locations if appropriate.

Applicable Project Components:	**All project components involving construction within street rights-of-way**
Impact:	Temporary impact on traffic in the project area from construction activities in the street rights-of-way (Storm Drains, Street Storage, catch basins, etc.)
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency) and City of Los Angeles
Monitoring Method:	Review plans and specifications for inclusion of measures outlined in the construction area traffic control plan and/or detour plan Review documentation of correspondence and notices
Documentation of Compliance:	Project Component: _____ T-2 Date: _____ Initial: _____ T-3 Date: _____ Initial: _____ T-4 Date: _____ Initial: _____ T-5 Date: _____ Initial: _____ T-6 Date: _____ Initial: _____

Mitigation Measure T-7 Pre-Construction

As necessary, obtain a transportation permit from Caltrans for transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways.

Applicable Project Components:	**All project components**
Impact:	Temporary impact on traffic in the project area from construction vehicles and equipment
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency) and Caltrans
Monitoring Method:	Review transportation permit
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

2.7 UTILITIES

Mitigation Measure U-2 Pre-Construction

If utility service disruption is necessary [see Mitigation Measure U-1, **Section 1.6**], residents and businesses in the project area will be notified a minimum of 2 to 4 days prior to service disruption through local newspapers, direct mailings to affected parties, or public posting of notices.

Applicable Project Components:	**All project components involving construction within street rights-of-way**
Impact:	Potential interference with existing utilities within street rights-of-way from construction of Storm Drains, Street Storage, catch basins, etc.
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Review notices and mailing lists
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measure U-4 Pre-Construction

The plans and specifications for the proposed project will state that the construction contractor is required to identify and implement programs for minimizing solid waste generated during construction. These programs will include, at a minimum, recycling of asphalt and concrete paving materials, and balance of graded soil on site to the maximum extent feasible.

Applicable Project Components:	All project components
Impact:	Impact on landfill capacity from generation of solid waste during construction
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Review project plans and specifications
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measure U-5 Pre-Construction

Prior to construction, the City of Los Angeles Bureau of Sanitation will be notified of the construction schedule and planned lane or road closures so that solid waste collection routes and access in the area may be modified accordingly.

Applicable Project Components:	All project components
Impact:	Impact on solid waste collection routes during construction of Storm Drains, Street Storage, catch basins, etc.
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency) and City of Los Angeles Bureau of Sanitation
Monitoring Method:	Review notices
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Section 3 Construction

3.1 AIR QUALITY

Mitigation Measures A-1 through A-9 Construction

A-1 Clean dirt from construction vehicle tires and undercarriages when leaving the construction site and before entering local roadways.

A-2 During earth-moving activities, water the construction area as necessary, but at least twice per day.

A-3 Water temporary open storage piles once per hour or install temporary covers.

A-4 Water unpaved roadways three times per day or apply non-toxic soil stabilizers.

A-5 Limit construction vehicle speed on the project site to 15 miles per hour (mph) or less.

A-6 Cover dirt in trucks during on-road hauling.

A-7 Cease earth-moving activities on days when wind gusts exceed 25 mph or apply water to soil not more than 15 minutes prior to moving such soil.

A-8 Sweep streets near the construction area at the end of the day if visible soil material is present.

A-9 For applicable construction areas, establish a vegetative groundcover as soon as feasible after active operations have ceased. Groundcover will be of sufficient density to expose less than 30 percent of unstabilized ground within 90 days of planting.

Applicable Project Components:	**All project components**
Impact:	PM10 (Fugitive Dust) Emissions During Construction
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Construction inspection
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measure A-10 Construction

Per SCAQMD Rule 403(f), large construction operations (greater than 100 acres of disturbed area or daily earth-moving or throughput volume of 10,000 cubic yards three times during the most recent 365-day period) will either 1) implement fugitive dust suppression measures as specified in Tables 1 and 2 of Rule 403, or 2) prepare a fugitive dust emissions control plan and obtain approval from SCAQMD.

Applicable Project Components:	**Sheldon Pit, Cal Mat Pit, and Strathern Pit**
Impact:	PM10 (Fugitive Dust) Emissions During Construction
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Construction inspection
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measures A-11 and A-12 Construction

A-11 Prohibit all vehicles from idling in excess of 10 minutes, both on and off-site.

A-12 Maintain construction equipment in proper tune.

Applicable Project Components:	**All project components**
Impact:	Tailpipe Emissions from Construction (including NOx)
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Construction inspection
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

3.2 BIOLOGICAL RESOURCES

Mitigation Measure B-1 Construction

If avoidance of the existing coastal sage scrub vegetation at New Park on Wentworth is not feasible [as determined during the design phase – see **Section 1.1**], the following will be implemented:

- If the existing coastal sage scrub vegetation will be unavoidably impacted by project construction, the vegetation and associated topsoil will be removed, salvaged or mulched, and stockpiled separately. Following the completion of project construction, the stockpiled topsoil will be replaced and stockpiled vegetation will be replanted (or replaced if mulched) on the site of origin or on another adjacent location as appropriate, under the direction of a qualified biologist. Retention and reapplication of stockpiled topsoil and vegetation will be supplemented with onsite restoration and/or rehabilitation of the same vegetation type at a ratio of 1:1, at minimum, as appropriate and biologically feasible; or
- Restoration at other project component site(s) [post-construction – see **Section 4.1**]; or
- Restoration outside of project component sites [post-construction – see **Section 4.1**]

Applicable Project Components:	**New Park on Wentworth**
Impact:	Construction impacts on the existing coastal sage scrub vegetation
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Construction monitoring by a qualified biologist
Documentation of Compliance:	Date: _____ Initial: _____

Mitigation Measure B-2 Construction

If high value vegetation/habitat types are identified during biological surveys at Vulcan Gravel Processing Plant, Sheldon Pit, Cal Mat Pit, and Strathern Pit and avoidance of such habitat types is not feasible [as determined during the design phase – see **Section 1.1**], the following will be implemented:

(a) If a high value vegetation type will be unavoidably impacted by project construction, the vegetation and associated topsoil will be removed, salvaged or mulched, and stockpiled separately. Following the completion of project construction, the stockpiled topsoil will be replaced and stockpiled vegetation will be replanted (or replaced if mulched) on the site of origin or on another adjacent location as appropriate, under the direction of a qualified biologist. Retention and reapplication of stockpiled topsoil and vegetation will be supplemented with onsite restoration and/or rehabilitation of the same vegetation type at a ratio of 1:1, at minimum, as appropriate and biologically feasible; or

(b) Restoration at other project component site(s) [post-construction – see **Section 4.1**]; or

(c) Restoration outside of project component sites [post-construction – see **Section 4.1**]

Each acre of created wetlands that requires maintenance (e.g., sediment removal), and will be used to mitigate impacts to existing wetlands in (a) through (c) above, will be used for mitigation at a ratio of 2:1.

Applicable Project Components:	**Vulcan Gravel Processing Plant, Sheldon Pit, Cal Mat Pit, and Strathern Pit**
Impact:	Construction impacts on sensitive habitat types whose presence is not known but could not be excluded
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Construction monitoring by a qualified biologist
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

3.3 CULTURAL RESOURCES

Mitigation Measure C-1 Construction

A professional monitor qualified in historical archaeology shall be present for subsurface work between the surface and 5 feet in depth at the following project component sites: Stonehurst Park, Valley Steam Plant, and Roscoe Elementary School. If potentially important cultural deposits are encountered in the course of construction, work should be temporarily diverted from the vicinity of the discovery until the monitoring archaeologist can identify and evaluate the importance of the find and conduct any appropriate assessment and activities, as necessary.

Applicable Project Components:	**Stonehurst Park, Valley Steam Plant, and Roscoe Elementary School**
Impact:	Construction impact on buried archaeological resources
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Construction monitoring by a professional archaeological monitor
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measure C-2 Construction

On the first day of subsurface work, if any, at Strathern Pit, Cal Mat Pit and Sheldon Pit, a professional monitor qualified in historical archaeology shall be present to assess whether further monitoring might be warranted.

Applicable Project Components:	**Strathern Pit, Cal Mat Pit and Sheldon Pit**
Impact:	Construction impact on buried archaeological resources
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Construction monitoring by a professional archaeological monitor
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measures C-3 and C-4 Construction

C-3 If previously unknown cultural resources are discovered in the course of excavation for project construction at any project site, the construction inspector shall have the authority and responsibility to halt construction until a qualified archaeologist can evaluate the significance and distribution of the materials, and identify future activities needed. If the cultural material discovered is determined to be of potential archaeological significance, the investigation and future activities shall be conducted in consultation with culturally affiliated Native American or other parties, as necessary.

C-4 If human remains are discovered in the course of excavation for project construction, the County Coroner shall be contacted and provisions of State CEQA Guidelines Section 15064.5 would be followed.

Applicable Project Components:	**All project components**
Impact:	Unknown buried cultural resources or human remains
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Construction inspection and review of construction reports
Documentation of Compliance:	Project Component: _____ C-3 Date: _____ Initial: _____ C-4 Date: _____ Initial: _____

3.4 HAZARDS AND HAZARDOUS MATERIALS

Mitigation Measure H-1 Construction

If the proposed project would involve disturbance of contaminated soils (as determined by Phase I ESA and any additional investigation; see **Section 1.4**) soil would be removed and disposed of in compliance with applicable regulations at approved disposal sites.

Applicable Project Components:	**All project components except Onsite BMPs, Tree Planting & Mulching, and Storm Drains**
Impact:	Impacts related to potential soil contamination at project component sites
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Construction inspection and review of construction reports
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

3.5 HYDROLOGY (SURFACE AND GROUND WATER QUALITY)

Mitigation Measure W-1 Construction

Implement Storm Water Pollution Prevention Plan (SWPPP) developed prior to construction [see **Section 2.3**].

Applicable Project Components:	**All project components except Onsite BMPs, Tree Planting & Mulching involving constructing, clearing, grading or excavation on areas over 1 acre in size**
Impact:	Construction impacts on surface water quality related to soil erosion
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Construction inspection
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

3.6 NOISE

Mitigation Measures N-1 and N-2 Construction

N-1 Construction activities will be limited to the hours allowed by the City of Los Angeles Noise Ordinance (i.e., between 7 a.m. and 9 p.m. on weekdays and between 8 a.m. and 6 p.m. on Saturdays and national holidays) unless written permission has been obtained from the City of Los Angeles Board of Police Commissioners per Section 41.40 of the Los Angeles Municipal Code.

N-2 All mobile construction equipment will be equipped with properly operating mufflers or other noise reduction devices.

Applicable Project Components:	**All project components except Tree Planting & Mulching**
Impact:	Construction noise impact on sensitive receptors
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Enforcement Agency	City of Los Angeles
Monitoring Method:	Construction inspection
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

3.7 PUBLIC SERVICES

Mitigation Measures P-5 through P-11 Construction

P-5 Ensure that school buses have access to Sun Valley Middle School, Stonehurst Elementary School, Roscoe Elementary School, and St. Patrick's School during construction.

P-6 Ensure that safe and convenient pedestrian routes to Stonehurst, Roscoe, Sun Valley, and St. Patrick's Schools are maintained.

P-7 Maintain ongoing communication with the administrators of the schools and provide sufficient notice to forewarn children and parents when existing pedestrian and vehicular routes to school will be affected.

P-8 Install appropriate traffic controls (e.g., signs and signals) as needed to ensure pedestrian and vehicular safety.

P-9 As feasible, haul routes will not be routed past the schools except when school is not in session.

P-10 Construction or worker vehicles will not be parked or staged on streets adjacent to the schools.

P-11 All construction areas on or adjacent to schools, including trench areas, operating equipment areas and equipment staging and stockpile areas, will be secured through fencing or other barriers to prevent trespassing and reduce hazards to children and other pedestrians.

Applicable Project Components:	**Roscoe Elementary School, Stonehurst Elementary School, Sun Valley Middle School, and storm drains on Cahuenga Boulevard**
Impact:	Construction impact on school access and student safety
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Construction inspection Review documentation of correspondence with school administrators
Documentation of Compliance:	Project Component: _____ P-5 Date: _____ Initial: _____ P-6 Date: _____ Initial: _____ P-7 Date: _____ Initial: _____ P-8 Date: _____ Initial: _____ P-9 Date: _____ Initial: _____ P-10 Date: _____ Initial: _____ P-11 Date: _____ Initial: _____

3.8 UTILITIES

Mitigation Measure U-3 Construction

[Cross-reference with **Mitigation Measure U-1, Section 1.6**, to be implemented during design phase]: The contractor will be required to excavate around utilities, including hand excavation as necessary, to avoid damage and to minimize interference with safe operation and use. Hand tools must be used to expose the exact location of buried gas or electric utilities.

Applicable Project Components:	**All project components involving construction within street rights-of-way**
Impact:	Potential interference with existing utilities within street rights-of-way from construction of Storm Drains, Street Storage, catch basins, etc.
Party Responsible for Implementation:	Construction contractor
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Construction inspection and review of construction reports
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Section 4 Post-Construction

4.1 BIOLOGICAL RESOURCES

Mitigation Measure B-1 Post-Construction

If avoidance of the existing coastal sage scrub vegetation at New Park on Wentworth is not feasible [as determined during the design phase – see **Section 1.1**], the following will be implemented:

- If the existing coastal sage scrub vegetation will be unavoidably impacted by project construction, the vegetation and associated topsoil will be removed, salvaged or mulched, and stockpiled separately [during construction phase – see **Section 3.2**]. Following the completion of project construction, the stockpiled topsoil will be replaced and stockpiled vegetation will be replanted (or replaced if mulched) on the site of origin or on another adjacent location as appropriate, under the direction of a qualified biologist. Retention and reapplication of stockpiled topsoil and vegetation will be supplemented with onsite restoration and/or rehabilitation of the same vegetation type at a ratio of 1:1, at minimum, as appropriate and biologically feasible; or
- If post-construction restoration and/or rehabilitation locations cannot be identified on-site, then appropriate and biologically feasible locations identified within other component sites shall be expanded to accommodate additional restoration to meet the 1:1 ratio, at minimum; or
- If appropriate and biologically feasible restoration and/or rehabilitation for the impacted coastal sage scrub cannot cumulatively be identified within the project component sites, and conditions on the site(s) are appropriate and biologically feasible for a different high-value vegetation type on the site, restoration and/or rehabilitation of this vegetation type may be substituted at a ratio of 1:1, at minimum.

Applicable Project Components:	**New Park on Wentworth**
Impact:	Construction impacts on the existing coastal sage scrub vegetation
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Monitoring of restoration/rehabilitation by a qualified biologist
Documentation of Compliance:	Date: _____ Initial: _____

Mitigation Measure B-2 Post-Construction

If high value vegetation/habitat types are identified during biological surveys at Vulcan Gravel Processing Plant, Sheldon Pit, Cal Mat Pit, and Strathern Pit and avoidance of such habitat types is not feasible [as determined during the design phase – see **Section 1.1**], the following will be implemented:

(a) If a high value vegetation type will be unavoidably impacted by project construction, the vegetation and associated topsoil will be removed, salvaged or mulched, and stockpiled separately [during construction phase – see **Section 3.2**]. Following the completion of project construction, the stockpiled topsoil will be replaced and stockpiled vegetation will be replanted (or replaced if mulched) on the site of origin or on another adjacent location as appropriate, under the direction of a qualified biologist. Retention and reapplication of stockpiled topsoil and vegetation will be supplemented with onsite restoration and/or rehabilitation of the same vegetation type at a ratio of 1:1, at minimum, as appropriate and biologically feasible; or

(b) If post-construction restoration and/or rehabilitation locations cannot be identified on-site, then appropriate and biologically feasible locations identified within other component sites shall be expanded to accommodate additional restoration to meet the 1:1 ratio, at minimum; or

(c) If appropriate and biologically feasible restoration and/or rehabilitation for the impacted high value vegetation type cannot cumulatively be identified within the project component sites, and conditions on the site(s) are appropriate and biologically feasible for a different high-value vegetation type on the site, restoration and/or rehabilitation of this vegetation type may be substituted at a ratio of 1:1, at minimum.

Each acre of created wetlands that requires maintenance (e.g., sediment removal), and will be used to mitigate impacts to existing wetlands in (a) through (c) above, will be used for mitigation at a ratio of 2:1.

Applicable Project Components:	**Vulcan Gravel Processing Plant, Sheldon Pit, Cal Mat Pit, and Strathern Pit**
Impact:	Construction impacts on sensitive habitat types whose presence is not known but could not be excluded
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Monitoring of restoration/rehabilitation by a qualified biologist
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

4.2 GEOLOGY AND SOILS

Mitigation Measure G-2 Post-Construction

Monitoring wells proposed for the Phase 1 projects (Cal Mat Pit, Sun Valley Middle School, and Valley Steam Plant) of the Watershed Management Plan as well as existing wells in the project area will be used to detect any substantial increase in groundwater levels. If monitoring indicates a substantial rise in groundwater levels (i.e., within 30 feet of the surface) at or near Sheldon Pit, Cal Mat Pit, or the Power Line Easement, stormwater would not be infiltrated and would be diverted into storm drains or onto street surfaces.

Applicable Project Components:	**Sheldon Pit, Cal Mat Pit, and Power Line Easement**
Impact:	Impacts related to liquefaction potential from proposed stormwater infiltration
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Conduct groundwater monitoring Incorporate contingency measure into the operation and maintenance plan
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

4.3 HAZARDS AND HAZARDOUS MATERIALS

Mitigation Measure H-3 Post-Construction

Regularly consult with GLAVCD to identify mosquito management problems, mosquito monitoring and abatement procedures, and opportunities to adjust water and vegetation management practices to reduce mosquito production. Mosquito control measures to be used by GLAVCD could include mosquito fish stocking, and application of Bti, Methoprene, and/or Agnique MMF, as appropriate. [See also **Section 1.4** for consultation activities during the design phase.]

Applicable Project Components:	**Sheldon Pit, Strathern Pit, Cal Mat Pit, Power Line Easement, Valley Steam Plant, and Vulcan Gravel Processing Plant**
Impact:	Public health impacts related to potential increase in mosquito habitat
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency) and GLAVCD
Monitoring Method:	Review documentation of correspondence
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

4.4 HYDROLOGY (SURFACE AND GROUND WATER QUALITY)

Mitigation Measure W-2 Post-Construction

LACDPW will prepare an annual vadose zone, surface water, and groundwater quality monitoring report to present the results of the Phase 1 projects to the Stakeholders. LACDPW will work with the Stakeholders to evaluate the effectiveness of the stormwater treatment devices and determine the necessity of additional stormwater treatment prior to subsequent infiltration or for use in wetlands designed to provide wildlife habitat. Where indicated based on water quality concerns, additional stormwater treatment will be installed or infiltration will be discontinued at the relevant site. For sites with constructed wetlands that support wildlife habitat, modifications necessary based on water quality concerns will be designed to retain wetland vegetation or manage the wetlands in accordance with wildlife agency agreements or consultations.

Applicable Project Components:	All project components (as applicable)
Impact:	General operational impacts on groundwater quality from stormwater infiltration
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Review documentation of Stakeholder coordination
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____

Mitigation Measure W-4 Post-Construction

If the site-specific Phase I ESA indicates that an active or closed landfill (either municipal solid waste or inert construction waste) is within 500 feet from the project site boundary, a groundwater monitoring program will be developed to ensure that infiltration does not result in interaction between infiltrated stormwater and landfill materials [during design phase – see **Section 1.5**]. Infiltration would cease at any site where groundwater levels rose to within 10 feet of landfill materials.

Applicable Project Components:	All project components
Impact:	Groundwater hydrology impacts (Potential inundation of landfill material from stormwater infiltration)
Party Responsible for Implementation:	LACDPW (or future designated lead agency)
Agency Responsible for Monitoring:	LACDPW (or future designated lead agency)
Monitoring Method:	Conduct groundwater monitoring Incorporate contingency measure into the operation and maintenance plan
Documentation of Compliance:	Project Component: _____ Date: _____ Initial: _____