

# **Puente Hills Landfill Park Master Plan**

## **Final Program Environmental Impact Report**



**September 2016**

**State Clearinghouse Number 2015121051**



**PUENTE HILLS LANDFILL  
PARK MASTER PLAN  
FINAL  
PROGRAM ENVIRONMENTAL IMPACT REPORT  
SEPTEMBER 2016**

**State Clearinghouse Number 2015121051**

**Prepared for:**



**County of Los Angeles  
Department of Parks and Recreation  
Planning & Development Agency  
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## **SECTION 1.0**

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### **INTRODUCTION**

#### **1.1 FINAL ENVIRONMENTAL IMPACT REPORT ORGANIZATION**

The Draft Program Environmental Impact Report (PEIR) for the Puente Hills Landfill Park Master Plan (Proposed Project) was circulated for public and agency review and comment from June 24, 2016 to August 8, 2016. According to the California Environmental Quality Act (CEQA) Guideline Section 15132, a Final EIR must be prepared and must include a list of persons, agencies, and organizations commenting on the Draft EIR; copies of the comments received during public review of the Draft EIR; and the Lead Agency's response to those comments.

As required by Section 15132 of the CEQA Guidelines, this Final PEIR responds to comments regarding significant environmental issues and concerns raised in the public and agency review process. This document provides responses to comments on significant environmental issues, describes the disposition of the issues, and explains the Draft PEIR analysis by either supporting Draft PEIR conclusions or providing clarifying information, as appropriate.

This Final PEIR is organized as follows:

- ◆ **Section 1** provides a discussion of the purpose of the Final PEIR and discusses the structure of this document;
- ◆ **Section 2** lists the agencies, organizations, and individuals that commented on the contents of the Draft PEIR;
- ◆ **Section 3** includes the comments received on the Draft PEIR and the responses to those comments;
- ◆ **Section 4** provides revisions to the Draft PEIR (Errata); and
- ◆ **Section 5** provides the Mitigation Monitoring and Reporting Program (MMRP) prepared consistent with CEQA requirements.

This Final PEIR incorporates by reference the Draft PEIR and technical appendices. These documents, and other information contained in the environmental record, constitute the Final PEIR for the Proposed Project.

#### **1.2 SUMMARY OF DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT COMMENT PERIOD**

The Draft PEIR and Notice of Availability (NOA) were distributed for review and comment to a mailing list of 19 cities, stakeholders, and local agencies; the State Clearinghouse; and other interested parties for a 45-day public and agency review period from June 24, 2016 to August 8, 2016. The NOA was also filed at the Los Angeles

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County Clerk, and posted on the Puente Hills Landfill Park Master Plan website at: <http://www.puentehillslandfillpark.org/library>. The Draft PEIR and NOA were also available for review at the County of Los Angeles Department of Park and Recreation (DPR) offices, the Hacienda Heights Express Library at Steinmetz Park, Sorensen Library, Sunkist Library, and on the Proposed Project website. The NOA was also published in the following newspaper:

- ♦ *San Gabriel Valley Tribune* , legal notice, June 24, 2016

One public meeting was held during the public comment period. The public meeting took place on June 29, 2016 at the Hacienda Heights Community Center which was attended by approximately 100 people. A presentation was held to provide an opportunity for the public to learn more about the Proposed Project as a result of scoping comments, the results of the analysis in the Draft PEIR, and their opportunities to comment on the analysis in the Draft PEIR. Public outreach for the public meeting included an e-mail blast to approximately 635 residents, officials, agencies, and organizations. In addition, a postcard informing the public about the public meeting, NOA, and Draft PEIR was mailed to approximately 5,500 properties within 0.5 mile of the Proposed Project.

A separate meeting was also held with the Technical Advisory Committee (TAC) on June 23, 2016 at the Hacienda Heights Community Center. The TAC has met on four other occasions during the master plan and environmental documentation process: August 20, 2015; September 24, 2015; October 29, 2015; and January 21, 2016.

The following agencies and organizations participated in the TAC:

1. Los Angeles County Civic Arts Commission
2. Los Angeles County Department of Parks & Recreation, Planning & Development Agency
3. Los Angeles County Department of Regional Planning
4. Los Angeles County Department of Public Works
5. Los Angeles County Fire Department
6. Los Angeles County Sanitation Districts
7. Rio Hondo College
8. Rose Hills Memorial Park
9. Puente Hills Habitat Preservation Authority
10. Southern California Edison
11. Regional Water Quality Control Board, Los Angeles Region

### **1.3 RECIRCULATION DETERMINATION**

Several commenters have asserted that the Draft PEIR will require circulation based on new information or revisions that would occur based on public and agency comments. In responding to comments from agencies, organizations, and the general public, information has been added to clarify and expand upon the impact discussions in the Draft PEIR. In response to several comments, some mitigation measures have been refined or adjusted to ensure that projected environmental impacts were reduced to less

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than significant levels; however, no new mitigation measures had been added to the EIR. Because this new information was added to the PEIR prior to certification, DPR considered the potential to recirculate the PEIR.

Section 15088.5 of the CEQA Guidelines provides the criteria for recirculation of an EIR prior to certification. A Lead Agency must recirculate an EIR when significant new information is added to an EIR after public notice is given of the availability of the Draft EIR for public review, but before circulation. New information is not “significant” just because it is new. Section 15088.5 defines “significant new information” as information showing that:

- 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- 3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
- 4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Recirculation is not required where the new information added to the EIR merely clarifies or makes insignificant modifications in an adequate EIR.

The additional analysis and information provided in Section 3, Responses to Comments, and Section 4, Errata, of this Final PEIR does not meet any of the above criteria for recirculation. The responses to comments provide information that supplements and elaborates on the analysis in the Draft PEIR. However, this new analysis did not reveal any new significant environmental impacts or a substantial increase in the severity of any previously identified environmental impact. Additionally, no project alternatives or mitigation measures that were considerably different from those previously analyzed in the Draft PEIR, and that would also clearly lessen the Proposed Project’s environmental impacts, were proposed in the comments. Further, although no new mitigation measures have been added, report preparers have considered suggested input regarding mitigation measures and made adjustments or refinements where needed to improve the effectiveness of previously proposed measures.

Several commenters expressed concern that additional analysis or revised mitigation measures could be construed as “significant information” requiring recirculation. However, all of the revisions to the Draft PEIR, including the comment responses, merely provide clarification and does not add “new significant information” as defined in CEQA Guidelines Section 15088.5. Therefore, recirculation is not required.

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## **SECTION 2.0**

### **LIST OF COMMENTORS**

A list of public agencies, organizations, and individuals that provided comments on the Draft PEIR is presented below. The letters have been organized into five categories:

- A. Agencies
- B. Organizations
- C. General Public
- D. Public Meeting
- E. Support

Support letters were also received by agencies and organization and are included in their respective categories. The support letters in Category E are from the general public. Each comment letter has been assigned a numerical designation corresponding to the category they are in. Each comment within each letter has been assigned an additional numerical designation so that each comment can be cross-referenced with an individual response. These letters, and the responses to the comments, are in Section 3 of this Final PEIR.

**Table 2-1  
List of Comment Letters**

<b>LETTER NUMBER</b>	<b>SENDER</b>	<b>DATE RECEIVED</b>
<b>A - Agencies</b>		
Letter A1	Los Angeles Regional Water Quality Control Board	7/28/2016
Letter A2	Puente Hills Habitat Preservation Authority	8/1/2016
Letter A3	County of Los Angeles Fire Department	8/3/2016
Letter A4	South Coast Air Quality Management District	8/3/2016
Letter A5	County Sanitation Districts of Los Angeles County	8/4/2016
Letter A6	California Department of Transportation	8/4/2016
Letter A7	Wildlife Corridor Conservation Authority	8/5/2016
Letter A8	United States Fish and Wildlife Service	8/8/2016
Letter A9	City of Whittier	8/8/2016
Letter A10	City of El Monte – City Manager Jesus Gomez	8/8/2016
Letter A11	City of El Monte – Councilman Jerry Velasco	8/8/2016
Letter A12	City of El Monte – Mayor André Quintero	8/8/2016
Letter A13	Rio Hondo College	8/8/2016
Letter A14	Los Angeles County Arts Commission	8/8/2016
Letter A15	Watershed Conservation Authority	8/8/2016
Letter A16	Governor’s Office of Planning and Research – State Clearinghouse and Planning Unit	8/16/2016
<b>B – Organizations</b>		
Letter B1	Friends of the Whittier Hills	8/5/2016
Letter B2	Hacienda Heights Improvement Association, Inc.	8/7/2016
Letter B3	Hills for Everyone	8/8/2016

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<b>LETTER NUMBER</b>	<b>SENDER</b>	<b>DATE RECEIVED</b>
Letter B4	Rose Hills Memorial Park	8/8/2016
Letter B5	Save Our Community	8/8/2016
Letter B6	Sierra Club	8/8/2016
Letter B7	Amigos de los Rios	8/8/2016
Letter B8	Bike San Gabriel Valley	8/8/2016
Letter B9	San Gabriel Mountains Forever	8/8/2016
Letter B10	San Gabriel Valley Conservation Corps	8/8/2016
Letter B11	Concerned Off-Road Bicyclist Association	8/8/2016
Letter B12	Day One	8/8/2016
<b>C – General Public</b>		
Letter C1	Don Moss	8/7/2016
Letter C2	Lee M. Willard	8/8/2016
Letter C3	John Shubin	8/8/2016
Letter C4	Charles E. Lawrence	8/8/2016
Letter C5	Judy Ennis	8/8/2016
<b>D – Public Meeting</b>		
Letter D1	Andrew Yip	6/29/2016
Letter D2	Diane Velez	6/29/2016
Letter D3	Amy Wong	6/29/2016
Letter D4	Myca Tran	6/29/2016
Letter D5	Robert Tsang	6/29/2016
Letter D6	Lee M. Willard	6/29/2016
<b>E – Support</b>		
Letter E1	Adam C. Carranza	8/8/2016
Letter E2	Albert M. Sotelo	8/8/2016
Letter E3	Amy J. Wong	8/8/2016
Letter E4	Desiree Harbaugh	8/8/2016
Letter E5	Florencio Briones	8/8/2016
Letter E6	Frits Dannenberg	8/8/2016
Letter E7	James Wei	8/8/2016
Letter E8	Jennifer Mata	8/8/2016
Letter E9	Jimmy Tang	8/8/2016
Letter E10	Maria Morgan	8/8/2016
Letter E11	Nancy Lara	8/8/2016
Letter E12	Jeanette Flores	8/8/2016
Letter E13	Lawrence Shih	8/8/2016
Letter E14	Augusto Sarmiento	8/8/2016
Letter E15	Kathy Leal	8/8/2016
Letter E16	Enrique Huerta	8/8/2016
Letter E17	Hacienda Heights Residents 1. Andrew Fung Yip 2. Philip Hong Yip 3. Wing Ching Yip 4. May Ling Lo 5. Ying Ye Lo	8/9/2016

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LETTER NUMBER	SENDER	DATE RECEIVED
	6. Ping Yee 7. Emilie Chen 8. Katie Wooldridge 9. Eddie Rios 10. Clara Chia 11. Irene Chia 12. Mercy Chia 13. Estevan DeGuzman 14. Paul Sanchez 15. Katia Tyra 16. Barnabus Ng 17. Ana Maritza Rivera 18. Rio Rivera 19. Melissa Supamongkol 20. Jasmine Serna 21. Tiffany Lua 22. Jenaro Hernandez 23. Elvira Hernandez 24. Lizbeth Hernandez 25. Rosa A. Lopez 26. Juan Lopez 27. Silvia Lopez 28. Diana Lopez	
Letter E18	Carlos Sanchez	8/9/2016

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## **SECTION 3.0**

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### **RESPONSES TO COMMENTS**

This section includes the letters received during the public and agency review period on the Draft PEIR, followed by responses to the comments in the letters. Revisions to the Draft PEIR are included in Section 4 of this Final PEIR. The responses are organized as listed in Table 2-1.

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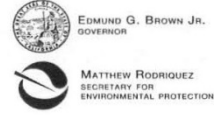
### **3.1 CATEGORY A: AGENCY COMMENTS**

This section provides responses to the comment letters submitted by agencies. A master response was provided for Letters A10 through A15.

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**Letter A1 - Los Angeles Regional Water Quality Control Board**



**Los Angeles Regional Water Quality Control Board**

July 27, 2016

Ms. Julie Yom  
County of Los Angeles  
Department of Parks and Recreation  
510 S. Vermont Avenue, Room 201  
Los Angeles, CA 90020

Dear Ms. Yom:

**COMMENTS ON DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR PARK MASTER PLAN PROJECT - PUENTE HILLS LANDFILL, WHITTIER, CALIFORNIA (FILE NO. 57-220, ORDER NO. R4-2013-0156, CI-2294, GEOTRACKER GLOBAL ID L10009779056)**

Reference is made to the Notice of Completion and Availability of a Draft Program Environmental Impact Report (DEIR) for the proposed Puente Hills Landfill (Landfill) Park Master Plan Project (Project) issued by the County of Los Angeles Department of Parks and Recreation (Parks Department) on June 24, 2016. The proposed Project is a long range master plan to develop the closed Landfill into a regional park for the greater Los Angeles area. Specifically, approximately 117 acres of top deck fill areas of the Landfill would, over time, be developed into more active recreational facilities, while the remainder of site, including approximately 483 acres of side slope fill areas would remain as more passive recreation or open space. Los Angeles Regional Water Quality Control Board (Regional Board) Land Disposal Program staff has reviewed the DEIR and provides the following comments:

In accordance with the Final Closure Plan for the Landfill that was approved by this Regional Board and other regulatory agencies, the top deck final cover at Landfill was constructed as a water balance landfill cover that is designed to control percolation by balancing the water storage capacity of unsaturated finer-textured soils and the ability of plants and the atmosphere to extract water stored in the soil. Because the final cover for the top deck area of the Landfill was approved as an open space end use, any land use other than open space for the area during the postclosure maintenance period must be reviewed and approved by the Regional Board Executive Officer prior to implementation.

**A1-1**

The active recreational land use proposed for the top deck areas of the Landfill as part of the Project will potentially alter the final grades, vegetative palette(s), irrigation schedules, and other features designed for an open space end use. Consequently, the Parks Department, in coordination/consultation with the County Sanitation Districts of Los Angeles County (Discharger), must evaluate the continued effectiveness, including postclosure maintenance, of the water balance cover for all areas where the final cover will be altered. Specifically, the Parks Department and Discharger must reevaluate the final cover of the top deck areas that are proposed to be transitioned to more active recreational facilities to assure that the final cover meets standards of applicable state and federal regulations. Considering that the proposed

**A1-2**

IRMA MUÑOZ, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4<sup>th</sup> St., Suite 200, Los Angeles, CA 90013 | [www.waterboards.ca.gov/losangeles](http://www.waterboards.ca.gov/losangeles)

♻️ RECYCLED PAPER

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Ms. Julie Yom  
County of Los Angeles  
Department of Park and Recreation

- 2 -


July 27, 2016

Project is a long term master plan, reevaluation of the final cover systems may be coordinated with the phased development of the Park.

**A1-2  
Cont.**

If you have any questions please contact Dr. Enrique Casas, Project Manager, at (213) 620-2299 or at [Enrique.casas@waterboards.ca.gov](mailto:Enrique.casas@waterboards.ca.gov).

Sincerely,

 *Chief Deputy E.O.*  
Samuel Unger, P.E. *for*  
Executive Officer

Cc: Ms. Kristen Ruffell, County Sanitation Districts of Los Angeles County

**Responses to Letter A1 – Los Angeles Regional Water Quality Control Board**

**Response to Comment A1-1:**

Comment states that because the final cover for the top deck area of the landfill was approved as an open space end use, any land use other than open space for the area during the post closure maintenance period must be reviewed and approved by the Regional Board Executive Officer prior to implementation. As described in Section 2 of the Draft Program Environmental Impact Report (PEIR), the Proposed Project only includes open space uses on the top decks.

**Response to A1-2:**

The comment states that the DPR must reevaluate the final cover of the top deck areas that are proposed to be transitioned to more active recreational facilities to assure that the final cover meets standards of applicable state and federal regulations. Such reevaluation may be coordinated with the phased development of the Proposed Project. DPR will work with the Sanitation Districts to ensure that the final cover continues to meet current standards. Mitigation Measure G-1 has been included in the Proposed Project which would require site specific geotechnical investigations during the design of each project component.

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**Letter A2 - Puente Hills Habitat Preservation Authority**



July 28, 2016

Julie Yom, Park Planner  
County of Los Angeles  
Department of Parks and Recreation  
Planning Division  
510 S. Vermont Avenue, Room 201  
Los Angeles, CA 90020  
jyom@parks.lacounty.gov

**Comments on the Draft Program Environmental Impact Report for the Puente Hills  
Landfill Park Master Plan Project**

Dear Ms. Yom:

The Puente Hills Habitat Preservation Authority (Habitat Authority) appreciates the opportunity to comment on the Draft Program Environmental Impact Report (DPEIR) for the Puente Hills Landfill Park Master Plan dated June 24, 2016.

The Habitat Authority is a joint powers authority created as a requirement of the conditional use permit of the Puente Hills Landfill with the primary objective to preserve and maintain native habitat in the region near the landfill. The Habitat Authority was established pursuant to California Government Code Section 6500 *et seq.* with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. According to its mission, the Habitat Authority is dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity. Additionally, the agency endeavors to provide opportunities for outdoor education and low-impact recreation. The Habitat Authority owns and or manages over 3,800 acres (the Puente Hills Preserve) which lie within the Cities of Whittier and La Habra Heights, as well as in the County unincorporated areas of the Puente Hills known as Hacienda Heights and Rowland Heights.

We appreciate the opportunity to comment on the Puente Hills Landfill Park Master Plan and look forward to a continued partnership with its development. We understand that the Project site is 600 acres of fill and includes development of 117 acres of fill and another 15 acres of non-fill plus the utilization of the 10-acre buttress site (142 acres total).

**Project Description:** The project features include an Entry Plaza, Maintenance & Operations Area, Buttress, Nike Hills, Western Deck, Eastern Deck, Southern Deck, the Flare Site and

A Joint Powers Agency created pursuant to California Government Code §6500 *et seq.*  
7702 Washington Avenue, Suite C, Whittier, CA 90602 • Phone: 562 / 945 - 9003 • Fax: 562 / 945 - 0303



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Comments on DPEIR for Puente Hills Landfill Park Master Plan  
Page 2

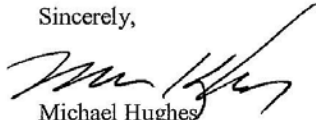
parking for 200 cars. Phases I and II of the Project involve development within the first 20 years, and Phases III through VI pertain to development within years 21 through 75. No further California Environmental Quality Act document is reported to be expected for Phases I and II beyond the DPEIR. Years 1 to 5 include but are not limited to the following: an Entry Plaza, 4-mile loop access road, 100 parking spots, 8,600 square foot Visitor Center, 1,650 square foot Maintenance Office, 6,000 square foot Nike Hill Plaza and Scenic Overlook, public bathrooms, development of 13 acres of the Western Deck (including performance area and 5-acre bike skills area), less than 4.25 miles of loop trails, bike rental, coffee cart at Scenic Overlook, and landscaping. Years 6 to 20 include but are not limited to: decorative fencing and gating at entry, design and install trail lift (gondola) including 1,000 square foot trail lift (gondola) structure at Entry Plaza, design and install 2,000 square foot trail lift (gondola) structure at the Nike Hill to include a café, restroom and staff office, expand top deck trails, provide equestrian staging on Southern Deck, expand signage and education components, mini café at (trail lift and) Visitor Center, and landscaping.

The Habitat Authority is concerned regarding the impact that the Project could have on biological resources, noise, recreation, public services, aesthetics, and land use, on the Puente Hills Preserve. We recommend that the Low Build Alternative (with minor adjustments) be selected as the preferred Project. The Low Build Alternative will have far less impacts and will be compatible with surrounding property uses.

As mentioned in our comments on the Draft Notice of Preparation (NOP) dated January 28, 2016, there has been a considerable public investment in the Puente Hills. Overall, at least \$100 million public dollars has been invested into the Puente Hills, mainly within the last 20 years. The sustainability of the Preserve is biologically dependent on the nearby and adjacent open space lands. The Proposed Project has an opportunity to complement and enhance the public investment already made in the region for the benefit of the community so it does not diminish the biological value of adjacent land owned by the Habitat Authority or other public agencies. Attached are further detailed comments.

Thank you for your consideration, and please do not hesitate to contact me or Andrea Gullo, Executive Director, at (562) 945-9003 for discussion.

Sincerely,



Michael Hughes  
Vice Chair

cc: Board of Directors  
Citizens Technical Advisory Committee

# PUENTE HILLS LANDFILL PARK MASTER PLAN

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### Detailed Comments

#### Global Comments:

1) Section 2.1.1 Surrounding Land Uses Page 2-2, Section 3.4 Environmental Setting Page 3.4-2: The Habitat Authority's Puente Hills Preserve (Preserve) is 3,780 acres, not 230 acres. The canyons in the Hacienda Hills are approximately 230 acres, and are a part of the Habitat Authority's Preserve. The Habitat Authority owns/manages the Hellman Park, Sycamore Canyon, and Arroyo Pescadero mentioned in the DPEIR, and are also a part of the Habitat Authority's Preserve.

**A2-1**

#### Biological Resources

2) *Direct and indirect impacts to coastal sage scrub (CSS) and critical habitat are not separately identified by acreage in the document. Any impacts should be mitigated in coordination with the California (CA) Department of Fish and Wildlife prior to construction.* Section 3.4.1.3 Sensitive Habitats (Page 3.4-9): Table 3.4-1 illustrates combined temporary and permanent impacts to vegetation communities that would occur from the Proposed Project. It states 12.5 acres of coastal sage scrub habitat, habitat depended upon by the coastal CA gnatcatcher, occurs within the Project Site. The DPEIR also states that 15.2 acres of federally designated critical habitat is within the Project site including the Buttress, Eastern Deck, Maintenance and Operations, Nike Hill, and Western Deck areas. It is unclear from the DPEIR how many direct, indirect, permanent and temporary impacts to vegetation including coastal sage scrub will result from the Project. Please clarify those impacts. Mitigation measures B-6 and B-8 address direct impacts to CSS from the loop park road, stair climb, switch back trails, bike skills, slides, trail lift (gondola) tower with café, staff office and restrooms at Nike Hill. Please consider altering Mitigation measures B-6 and B-8 to require coordination with the CA Department of Fish and Wildlife, the regulatory agency that addresses these impacts. Any impacts to unoccupied CSS should be mitigated with at least 2 to 1 ratio replacement CSS and not another vegetation type. A higher ratio should be used for occupied habitat and determined in consultation with the CA Department of Fish and Wildlife.

**A2-2**

3) *Direct impacts to the coastal CA gnatcatcher should be coordinated with the United States Fish and Wildlife Service.*

The Proposed Project involves developing all areas where the coastal CA gnatcatcher has been detected on the site. Figure 3.4-1 of the DPEIR illustrates the location of two pairs, two family groups, two nests, and two individual coastal CA gnatcatchers within or adjacent to the Project footprint. Section 3.4.4.1 Sensitive Plant and Wildlife Species Page 3.4-30 of the DPEIR states that direct impacts to the coastal CA gnatcatcher from the Project will occur from the loop park road, stair climb and switchback trails, bike skills, slides and trail lift (gondola) tower with café, staff office and restrooms at Nike Hill and result in a "take" of the species. However the proposed Mitigation Measures B-3, B-4, B-5 only address avoidance measures. It is unclear if there will be a "take" or if the nesting birds will be avoided. Any "take" of the species requires immediate coordination with the United States Fish and Wildlife Service.

**A2-3**

Since the timing of construction is unknown and the gnatcatcher breeding season starts in February, focused surveys for the coastal CA gnatcatcher will need to be conducted again in the

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year of construction to determine whether any additional coastal sage scrub habitat in the Proposed Project vicinity is “occupied” and may be affected by the Proposed Project. U.S. Fish and Wildlife Service Survey Guidelines for the gnatcatcher require that surveys must be current, within one year of Proposed Project initiation (i.e. the previous breeding season). Recent results, showing breeding gnatcatchers in the Proposed Project vicinity, demonstrate the viability of the habitat in this area for breeding, and increase the likelihood of possible additional breeding in the area. Mitigation Measure B-5 should require such surveys be conducted annually in the spring until Proposed Project initiation, and if any additional occupied habitat is found then impacts must be mitigated in accordance with the measures prescribed in the DPEIR as well as through the consultation and Incidental Take Permit process with U.S. Fish and Wildlife Service. Although Mitigation Measure B-5 requires protocol surveys for gnatcatchers prior to issuance of a grading permit, it does not account for the possible removal of any newfound occupied habitat outside of the breeding season.

**A2-3  
Cont.**

*4) The Rose Hills Road Alternative 2 or 3 is preferred so as to avoid impacts to coastal CA gnatcatchers and the adjacent Conceptual Significant Ecological Area (SEA).*

**A2-4**

*5) If nighttime lighting is mandated, we recommend absolute minimal nighttime lighting for security only, and should comply with the provisions of the County’s Rural Outdoor Lighting District.*

Lighting has the potential to negatively impact adjacent Habitat Authority property and Ecology Canyon. Some species, such as the bobcat, can be nocturnal and light sources can disturb their natural processes. Areas that are avoided by medium-to large-sized carnivores can have an increase in the number of mesopredators, which can have a negative effect on avian species of scrub communities. The Proposed Project should be dark sky compliant. Any night lighting on the site should be on timers and/or use motion detectors, and should not spill over onto adjacent properties.

**A2-5**

*6) The Proposed Project presents significant negative impacts to the wildlife corridor and linkage between the existing (Rio Hondo and Puente Hills) and conceptual (Hacienda Hills) SEAs. Please eliminate structures that prohibit wildlife movement, or weaken the wildlife corridor in this area for species that are documented or expected to use this area including but not limited to the mountain lion and coastal CA gnatcatcher.*

The Proposed Project has the potential to significantly impact mammalian and coastal CA gnatcatcher migration between Rio Hondo Wildlife Sanctuary SEA (Ecology Canyon) to the west and the Puente Hills SEA including the conceptual Hacienda Hills SEA both to the south and east with the proposed development of structures mentioned above. The habitat linking these SEAs is federally designated as critical habitat for the coastal CA gnatcatcher, and the Proposed Project footprint severs these connections. Also, the Proposed Project will compromise the sustainability of the SEAs with these severed connections.

**A2-6**

The Proposed Project site is part of the larger Puente-Chino Hills Wildlife Corridor, widely recognized for its regional importance for wildlife movement. The importance of the corridor is not solely for migration, which is generally defined as seasonal movements of individuals or groups. Corridors, particularly in areas where they constitute the only remaining natural habitat, are critical for daily wildlife movement needs such as hunting, as well seasonal movement needs such as during reproduction and for juvenile dispersal. In order for a corridor to maintain its

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function, it not only needs to provide physical space for wildlife to move through, but also needs to support the elements necessary for individuals or groups to persist over time to maintain connections between populations and promote genetic exchange and diversity. In addition, corridors must function to allow for movement and persistence during hazardous events such as wildfires. The Proposed Project will disrupt critical corridor functions by effectively disrupting the connection of the corridor, through both direct physical impacts and widespread indirect edge effects.

The Preserve exists to maintain and restore what remains of native grasslands, coastal sage scrub, riparian scrub, and oak woodland that existed in abundance in the past, but now are rare. The Puente Hills are among the last known habitats in the Los Angeles area for animals that are considered California Species of Special Concern and/or that are nearly extinct in the Los Angeles area. For example, the pending development of the Montebello Hills could cause the federally listed coastal CA gnatcatcher pairs located in that important "core" population to migrate to larger habitat areas such as the Puente Hills, and the PDEIR could have discussed about how not to impede that migration as requested in the Habitat Authority's NOP comment letter.

**A2-6  
Cont.**

### Noise

#### ***7) Impacts to wildlife from construction, roads and operation of special events need to be analyzed and avoided or mitigated.***

The DPEIR did not include any information about how noise from the Proposed Project could affect wildlife species. Barber, et al., 2009, evaluated numerous studies and resolved that anthropogenic sounds can dampen the hearing of animals leading to negative effects for wildlife by making sounds important for communication, reproductive success, and feeding difficult to hear, ultimately having unknown ecological consequences. Barber also established a model indicating how a one-decibel (dB) increase in existing sound level reduces the distance that an animal can detect something by 11 percent and reduces the area in which an animal can listen by 21 percent; increases of up to three dB can reduce the listening area for an animal by 50 percent<sup>1</sup>. This reduced area would impact an animal's ability to detect and avoid predators, and to detect and capture prey. Increased noise from the Proposed Project may compound existing noise levels present in the Preserve and impact wildlife, particularly during the construction phase and noise associated with special events. These effects need to be analyzed and either avoided or mitigated.

**A2-7**

#### ***8) Impacts to the coastal CA gnatcatcher during nesting season from the proposed 25 annual special events, with attendance as high as 5,000 people each, need to be analyzed and mitigated.***

All special events need to be monitored and kept at 60 decibels within 500 feet of coastal sage scrub and/or from locations where this protected species has been detected in the area. However, it is preferable that no special events be allowed to be held during nesting season, February 15 through August 31.

**A2-8**

<sup>1</sup> Barber, J.R., et al. 2009b. The Costs of Chronic Noise Exposure for Terrestrial Organisms. *Trends in Ecology and Evolution*, 25(3), 180-189.

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**Recreation**

*9) The PDEIR should provide appropriate mitigation measures for impacts to adjoining Habitat Authority trails including increased funding for law enforcement on County and Habitat Authority trails, as well as maintenance funds for Habitat Authority properties.*

The Proposed Project meets the threshold of significance for increasing the use or accelerating the physical deterioration of an existing neighborhood or regional park. The DPEIR states that the majority of the Proposed Project users would stay at the new park, while other new park users would potentially travel to the Habitat Authority property. Also, the parking lot in the Southern Deck (closest to the Habitat Authority's trails) provides for the highest capacity of cars (50 or 36% from those lots proposed on the top decks) except for the lot at the bottom entrance which accommodates 60 cars. The estimated monthly visitation projected for the Proposed Project is 32,200 people. Despite this estimate being extremely low given that the current monthly visitation at Hellman Park (managed by the Habitat Authority) is 33,063, even if there was a 10% crossover of trail users that visited Habitat Authority properties from the Proposed Project site this would increase our current trail use by 26% for the Hacienda Hills trails, as the Habitat Authority's 2016 user survey conducted by MIG, Inc. found that there are 12,562 monthly users at the Hacienda Hills Trailhead (a deduced number based on a 3-day visitor count).

The Habitat Authority has conducted several Preserve-wide user surveys to capture the number of visitors using the Preserve. Surveys were conducted in 2005, 2012 and 2016. From 2005 to 2012, Hellman Park visitation increased dramatically from 41 to 366 visitors per day (a 798% increase) and then to 1,087 visitors per day in 2016. A similar, but not so dramatic, trend was observed at Turnbull Canyon and Hacienda Hills. The results are shown below.

By multiplying the daily use by the number of days in the year (365) and dividing by the number of months (12), you can get an estimated monthly use by trailhead as shown below. Interestingly during the 2016 survey, about 14% to 15% of visitors at these three trailheads indicated that it was their first time at those locations, indicating that trail use will continue to increase in the future.

<i>Habitat Authority Puente Hills Preserve (not all locations provided)</i>	<b>Average Daily Use by People</b>			<b>Average Monthly Use</b>
<b>Location</b>	<b>2005 Survey</b>	<b>2012 Survey</b>	<b>2016 Survey</b>	<b>2016</b>
Hellman Trailhead	41	366	1087	33,063
Turnbull Canyon	73	282	475	14,448
Hacienda Hills	55	Not surveyed	413	12,562
<i>(Proposed Project estimates 32,200 visitors a month at full build-out)</i>				

The additional people on the trails from the Proposed Project meets the County's threshold of significance on the recreation environment of Habitat Authority trails by accelerating and causing substantial physical deterioration. The dramatic increase in use by people of the

**A2-9**

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Preserve trails as illustrated in the above table has resulted in trail degradation. The Habitat Authority has seen an increase in the need to maintain and manage graffiti, trash, vandalism, trail widening (which reduces habitat), creation of illegal trails (which fragments habitat), as well as other trail management challenges. Any extra use on the trails from the new park will be a significant impact to the Habitat Authority.

Furthermore, in response to the increase in use, Habitat Authority law enforcement rangers have experienced an increase in illegal activities and in the amount of contacts they make with visitors. The top three violations are parking, trail use after hours, and off-trail use. Recreational use is primarily during the daytime. The County has not provided *daytime* law enforcement on its Schabarum Trail for over the past 20 years. However, over the past year, the County Sheriffs have provided much needed, primarily, *nighttime* patrol to the County's trail access points. They have been very successful with issuing tickets and deterring illegal behaviors. More patrol of this nature is greatly needed throughout the *length* in addition to the access point patrols of the existing County trail especially during the day. The illegal use on all trails has taxed the Habitat Authority's rangers, and is at a tipping point for our available resources given the continued increase of visitation each year. Any extra use on the trails from the new park will be a significant impact to the Habitat Authority.

**A2-9  
Cont.**

Given that 1) the County's Schabarum Trail will be a conduit from the Proposed Project to Habitat Authority trails, 2) 36% of the top deck parking will be at the Southern Deck closest to the Habitat Authority trails, 3) the high volume of (current and projected) use deteriorates the trails and poses management challenges and 4) the very limited daytime patrol of the County trail – the Habitat Authority requests supplemental funding for County law enforcement and Habitat Authority law enforcement on trails (not only at the buildings and facilities at the Proposed Project), as well as supplemental funding for maintenance of Habitat Authority trails as mitigation.

*10) The Proposed Project meets the Recreation threshold of significance for interfering with open space connectivity. Please see the Biological Resources portion of this letter (#6).*

**A2-10**

*11) The Project needs to incorporate in Phase I, fencing and gates that block off nighttime access and illegal activity.*

*Security fencing and gates should be moved from Phase II to Phase I to protect the site and prevent illegal activity to the surrounding area including Habitat Authority property. Also, as stated earlier, nighttime access on trails is one of the top management problems for the area. The DPEIR did not address this issue. Please incorporate gates at the main entrance (lower level) as well from the new park (on the top decks) leading onto the County's Schabarum Trail that prohibits nighttime access to the Schabarum Trail. Additionally, nighttime access on the trails greatly diminishes biological functioning of wildlife and allows for illegal behaviors. The new park facility hours should be consistent with the hours of the adjacent trails and Habitat Authority trailheads (currently at sunrise to sunset).*

**A2-11**

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**Public Services**

***12) The Proposed Project meets the threshold of significance for creating capacity or service level problems for the County and surrounding trails.***

Security and law enforcement is needed on the trails and not only at the new park development as proposed. Please reference the earlier discussion under Recreation above (#9).

**A2-12**

***13) Please provide a calendar of special events to the Habitat Authority so that our rangers can be made aware for their patrol responsibilities.*** The Proposed Project special events (up to 25 a year with up to 5,000 people each) has the potential to impact the Habitat Authority.

**A2-13**

**Land Use and Planning**

***14) A 6,000 square foot Overlook Plaza, café, and other developments are not consistent with the intent of the land use for the Proposed Project site.***

The Proposed Project site is designated with the land use categories Public and Semi-Public (P) (Los Angeles County General Plan 2035) and Open Space – Parks and Recreation (OS-PR) (Hacienda Heights Community Plan). A 6,000-square-foot overlook plaza and café are proposed for the OS-PR land use category, which was established to provide for the preservation of lands for environmental, natural, historical and cultural resource conservation; and, to continue to provide recreational opportunities and preserve natural and wildlife areas for generations. The Proposed Project components are consistent with the zoning for the site (A-1 Light Agricultural, A-2 Heavy Agricultural, O-S Open Space); however, while individually or in limited combinations some of the proposed uses may be appropriate, when taken together with all proposed uses on the Proposed Project site the cumulative impact is the creation of an amusement park-type destination, wholly not in keeping with the intent of the OS-PR land use category or the goals of the Hacienda Heights Community Plan to preserve undeveloped hillsides and environmentally sensitive areas, and inconsistent with maintenance of the neighboring wildlife-oriented Habitat Authority open space.

**A2-14**

***15) A full analysis needs to be provided for impacts to the adjacent land use of the Habitat Authority's trails.***

On page 3.10-16 of the DPEIR it states that there may be impacts to adjacent land uses, the Habitat Authority's Preserve, from the potential increased trail use. However, it states that the impact is less than significant because it is anticipated that the majority of park users would stay at the Proposed Project site. Please provide more detailed analysis why this conclusion was reached. Analyzing data such as user surveys, law enforcement records, maintenance logs, trail width and vandalism overtime and compared to other natural parks are elements could be used in that analysis. Please reference the previous Recreation comments made in this letter for additional clarification.

**A2-15**

***16) The Proposed Project is not compliant with several Los Angeles County General Plan policies in the Conservation and Natural Resources (CNR) Element, and Parks and Recreation (PR) Element.***

We respectfully disagree with the DPEIR when it states that the Proposed Project is compliant with the following:  
Policy CNR 1.2 Protect and conserve natural resources, natural areas, and available open spaces.

**A2-16**

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Policy CNR 1.4 Create, support and protect an established network of dedicated open space areas that provide regional connectivity, ...  
Policy CNR 1.5 Provide and improve access to dedicated open space and natural areas for all users that considers sensitive biological resources.  
Policy PR 1.10 Ensure a balance of passive and recreational activities in the development of new facilities.  
Policy PR 5.3 Protect and conserve natural resources on County park properties, including natural areas, sanctuaries, and open space preserves.

**A2-16  
Cont.**

***17) The Proposed Project conflicts with the intent and conformance criteria of Significant Ecological Areas.***

The Project is not consistent with County's General Plan Policy CNR 3.7: Participate in interjurisdictional collaborative strategies that protect biological resources. We invite and encourage the Department of Parks and Recreation to support the efforts of the Habitat Authority and Wildlife Corridor Conservation Authority over the past 20 years as mentioned earlier on page 2 of this letter by developing a park that complements interjurisdictional collaborative strategies. Also, as stated in the DPEIR the Proposed Project will cause a significant adverse impact to the adjacent Hacienda Hills Conceptual SEA by altering native habitat, generating noise, and disrupting wildlife corridors with the Rose Hills route Alternative. However, it is unclear whether this route will utilize an existing road or create a new road. See our comments under the Biological Resources section above regarding coastal CA gnatcatchers, CSS and noise.

**A2-17**

**Aesthetics**

***18) Please mitigate for the potentially significant impact to the viewshed with the installation of the Proposed Project, specifically the trail lift (gondola), Nike Hill Plaza and Scenic Overlook and zip line features, from regional trails on the Habitat Authority's Puente Hills Preserve.*** Artist scenic renderings of the Proposed Project from these regional trails (off of the Proposed Project site) were not provided in the DPEIR. These prominent manmade structures will detract from the current natural viewshed enjoyed by many trail users who are there to reconnect with nature and escape the pressures of the urban environment. The DEIR acknowledges that the landfill is visible from several Habitat Authority trails, and that there would be no impact from the Project because the Habitat Authority trails are too distant. The landfill is a temporary facility, while the Proposed Project is a permanent one. It has been generally thought that these impacted viewsheds from the trails would be eliminated in the future with the closure of the landfill and restoration back to nature, however that would not be the case with the Proposed Project. Please reevaluate the impacts to aesthetics for these very prominent manmade structures that will permanently alter the experiences of regional trail users, including creating artistic renderings similar as were provided in the DPEIR of other viewpoints.

**A2-18**

**Alternatives**

***19) The Low Build Alternative (with minor adjustments) is the Preferred Project.*** According to the 2002 Puente Hills Landfill Conditional Use Permit, mitigation measure Mitigation Measure 4.2-8 states that, "To enlarge the wildlife movement corridor between Ecology Canyon and Sycamore Canyon, post-closure vegetation of the landfill with oak

**A2-19**

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woodland or coastal sage scrub would be conducted.” The Proposed Project is contrary to this (as described above in the Biological Resources section comment #6), therefore the Low Build Alternative is preferred.

As stated in the DPEIR the public voting clearly selected Ecology as the main preferred theme, and the Low Build Alternative honors this choice. The Low Build Alternative has the potential to meet the needs of surrounding communities by being accessible, including large picnic areas for multigenerational gatherings; and providing multilingual programming. The Low Build Alternative would help meet the regional demand for recreation and provide fitness opportunities to help address national trends related to inactivity, obesity and nature-deficit disorder.

Given the recent visitation survey numbers of local Habitat Authority trails (discussed earlier in the Recreation section), the DPEIR visitation numbers in this DPEIR are under-projected. With this in mind, the Road Circulation of the Proposed Project is recommended to not change with this Low Build Alternative, as well as not changing the Miles of Trails Development, the Dog Park feature and internal shuttle service. The Western or Eastern Decks (not the Southern) would be the preferred location for the main parking lot with this alternative.

Given that the Habitat Authority’s trails provide only passive recreation opportunities and that 81% of its users at the Hacienda Hills Trailhead are not from Hacienda Heights but are regional users, and that 53% of those at all Habitat Authority trailheads that identified their ethnicity are nonwhite (2016 Recreation Use Survey by the Puente Hills Habitat Preservation Authority unpublished), this Low Build Alternative logically also has the capacity to attract a diverse regional population.

The Low Build Alternative would have far less Biological and Aesthetic impacts (as discussed earlier) as well as presumably far less Greenhouse Gas impacts with the elimination of the trail lift (gondolas), zip lines, slides, café, bike skills, concert area, and any structure/feature that would have acted as impediment to the wildlife and biological health, as well as connectivity between Ecology Canyon and the Puente Hills Preserve.

**A2-19  
Cont.**

**Greenhouse Gas**

20) The DPEIR does not provide clear breakdown of greenhouse gasses by structure or number of cars, which is necessary for enabling meaningful analysis to consider viable options to avoid significant impacts.

**A2-20**

**Other**

*21) Please eliminate the component at the entrance from Habitat Authority Preserve Area from the Proposed Project until discussions are held and an agreement is achieved with the Habitat Authority.* Page 2-45 of the DPEIR describes Phase II of the Proposed Project in part as, “Improve Schabarum Trail, trailhead design, signage, wayfinding design, and implementation at eastern entrance from the Habitat Authority Preserve Area.” The Habitat Authority is unaware of the County’s intentions or proposal for land it manages. There are

**A2-21**

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many implications associated with this statement and impacts that would need to be analyzed that have not been included in this document. Therefore, please eliminate this option.

**A2-21  
Cont.**

*22) Consistency with the Puente Hills Landfill 2002 Conditional Use Permit measure regarding discouraging intrusion by humans and domestic animals in the eastern canyons is encouraged and urged.* Page 2-49: There is inadequate description in the DPEIR regarding the Phase V proposal of “eastern canyon acquisition and trail development”. As a reminder, the 2002 Conditional Use Permit for the Puente Hills Landfill Mitigation Measure 4.2-5 states, “Native protected topography would be maintained between the residential areas and the proposed habitat preservation area, and any retained open space at the mouth of Canyons 1, 2, 3, 4, and 5. In addition, measures would be implemented to discourage intrusion (by humans and domestic animals) into the preserved areas. Runs In perpetuity.”

**A2-22**

## **Responses to Letter A2 – Puente Hills Habitat Preservation Authority**

### **Response to Comment A2-1:**

The comment states that the Habitat Authority's Puente Hills Preserve (Preserve) is 3,780 acres, not 230 acres. The 230 acres comprise the portion of the Preserve within the landfill site in the Hacienda Hills. This clarification will be added to the Draft PEIR. Please refer to Section 4.0, Revisions to the Draft PEIR, of this Final PEIR.

### **Response to Comment A2-2:**

The comment states that is unclear as to the extents to impacts to vegetation that will result from the project. Please refer to response to comments provided in Letter A8, United States Fish and Wildlife Service.

### **Response to Comment A2-3:**

The commenter notes it is unclear as to if there will be "take" of nesting birds. The commenter also requests additional surveys be conducted annually for coastal California gnatcatcher. Mitigation Measure B-6 has been further refined to address any potential "take" of special status species. Please see Section 4.0, Revisions to the Draft PEIR, of this Final PEIR. Furthermore, coordination with the USFWS and CDFW are tied to Mitigation Measures B-3, B-4, and B-6 of the Draft PEIR. Please refer to response to comments provided in Letter A-8 for further clarification.

### **Response to Comment A2-4:**

The commenter prefers the Rose Hills Road Alternative 2 or 3 as to avoid impacts to coastal California gnatcatcher and the adjacent Conceptual Significant Ecological Area. Comment noted. See also Response to Comment A2-17 below.

### **Response to Comment A2-5:**

The commenter raised concerns regarding lighting impacts and recommends the Proposed Project be dark sky compliant and comply with the County's Rural Outdoor Lighting District. Section 3.4, page 3.4-29 of the Draft PEIR identified lighting impacts to sensitive wildlife species. The Proposed Project would not include park lighting except for security lighting of the M&O Yard. No stadium-type lighting is proposed. New lighting associated with the Proposed Project would be required to comply with existing County ordinances governing light pollution and the County of Los Angeles Park Design Guidelines and Standards, minimizing light and glare impacts.

### **Response to Comment A2-6:**

The commenter raised concerns over wildlife connectivity including coastal California gnatcatcher as a result of the Proposed Project. The majority of the project site is disturbed/developed as detailed in Section 3.4.1.2, Site Specific Setting, of the Draft PEIR and

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those areas provide minimal access to wildlife due to ongoing post-closure landfill maintenance activities. Wildlife corridor impacts are further detailed in Section 3.4.4.1, Sensitive Plant and Wildlife Species, on pages 3.4-35 to -37 of the Draft PEIR. Mitigation Measures B-6 and B-8 have been amended in Section 4.0, Revisions to the Draft PEIR, of this Final PEIR to address the loss of coastal sage scrub and effects on gnatcatcher and wildlife movement through the project area. Phase III of the Proposed Project includes the under-planting of the non-native slopes with native planting for enhancement of the wildlife corridor. Under-planting of the non-native slopes is not included in the earlier phases per the Sanitation Districts and are currently outside of the purview of DPR. The County will work collaboratively with the respective agencies to help maintain wildlife corridor connectivity to the extent practicable. Please refer to response to comments provided in Letter A8 (USFWS) for further clarification.

**Response to Comment A2-7:**

The commenter states that the Draft PEIR did not include any information on how noise from the Proposed Project could affect wildlife species, citing Barber et al. 2009.

Noise impacts to wildlife are discussed in Section 3.4 (pages 3.4-26, -29, -31-33, -35-37) of the Draft PEIR. The Proposed Project-related noise impacts are anticipated to be less than significant due in part due to the ongoing nature of the post-closure landfill maintenance and operations. Development within the project area would also incorporate landscape elements including trees, shrubs, and groundcover, which would assist in noise reduction onsite. Mitigation Measures B-4, B-5, B-8, B-10, and B-13 will be implemented to reduce this impact to a less than significant level.

**Response to Comment A2-8:**

The commenter prefers that all special events be held outside of the nesting [bird] season. The commenter also asks that if events are held during the nesting bird season that they be monitored and kept at 60 decibels within 500 feet of protected species. Comment is noted. Please see the response to comment A2-7 which notes that the Proposed Project-related noise impacts are anticipated to be less than significant, including special events. Please refer to the corresponding Mitigation Measures B-3 that has been clarified as part of the Section 4.0, Revisions to the Draft PEIR, of this Final PEIR to further address this issue.

**Response to Comment A2-9:**

This comment states that the Draft PEIR should provide appropriate mitigation measures for impacts to adjoining Habitat Authority trails, including increased funding for law enforcement on County and Habitat Authority trails, as well as maintenance funds for Habitat Authority properties. The Habitat Authority presents data that shows a dramatic increase of visitors to trails under the management of the Habitat Authority (Hellman Trailhead, Turnbull Canyon, and Hacienda Hills) from 2005 through 2016.

The Habitat Authority assumes that there would be visitor crossover from the Proposed Project to trails under the management of the Habitat Authority via the Schabarum-Skyline Trail because the Proposed Project would bring in additional visitors to the Puente Hills and provide a parking lot at the Southern Deck (closest to Habitat Authority trails). The Habitat Authority

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states that this visitor crossover would result in the accelerated physical deterioration of Habitat Authority trails. However, as stated in the comment, the Habitat Authority trails are already experiencing a dramatic increase in trail use which has resulted in trail degradation and other trail management challenges. This increase has occurred without the Proposed Project.

The Draft PEIR acknowledges that Proposed Project has the potential to result in visitor crossover from the proposed regional park to Habitat Authority trails, as stated on page 3.13-9 of the Draft PEIR. However, we note that the 60 space Southern Deck parking lot would serve onsite facilities more than offsite trail use. For example, this parking area would serve the bike skills course, equestrian staging area, adjacent picnic areas, the native plant nursery, and the temporary art installation area. Therefore, only a portion of the 60 spaces would be available to trail users, limiting impacts to offsite trails. Further, the proposed regional park would be patrolled by rangers, gated, and closed at night. As such, the vandalism, graffiti, and other law enforcement issues experienced at the Habitat Authority's trail heads is unlikely to increase due to project implementation. Thus, the Proposed Project is unlikely to add to burdens on the Habitat Authority regarding trailhead management, and as discussed further below, may actually decrease such problems.

The Draft PEIR acknowledges that the Proposed Project would provide a major new destination for visitors to the project vicinity, potentially reducing demand on Habitat Authority trailheads. For example, visitor crossover would occur in the other direction as well; from Habitat Authority trails to the Proposed Project. The Proposed Project has the potential to alleviate the impacts to Habitat Authority trails from the increase in visitors currently being experienced by the Habitat Authority without the Proposed Project's influence. The Proposed Project would develop 142 acres of recreational facilities within the closed Puente Hills Landfill which are currently not available to visitors of the Puente Hills. This would include more than 14 miles of new trails, paths and stair climbs, substantially increasing the availability and length of the public trail system within the vicinity. While the PEIR acknowledges that the Proposed Project would increase the amount of overall visitors to the Puente Hills, added recreational facilities and trails would limit net increase to such visitation. As stated in the Draft PEIR on page 3.13-9, the Proposed Project was designed to be a destination park with a wide range of amenities ranging from passive recreational activities (running loops, multi-use trails) to active recreational activities (bike skills, stair climbs, zip lines). These diverse recreational facilities would be available to new and existing visitors of the Puente Hills, including Habitat Authority trail visitors. By creating additional recreational facilities in the Puente Hills, the visitor load currently experienced by existing facilities, including Habitat Authority trails, would be distributed amongst a greater number of facilities. In addition, a key component of the Master Plan would be new active public education and outreach programs regarding environmental stewardship, informing members of the public regarding responsible trail use and the environmentally sensitive nature of adjacent lands. Thus, incremental increases in demand for Habitat Authority trails would not exceed the threshold of significance for deterioration of trails or impacts to adjacent habitats due to cutting of new trails or incremental widening of trails. Therefore, offsite trail impacts would remain less than significant.

It should also be noted that the impacts that would result from Future Phases are discussed at the program level in the Draft PEIR. The Proposed Project's estimated monthly visitation of 32,200 (Table 4-5 Draft PEIR, page 4-27), would occur incrementally over the next 30 years. As such, potential impacts from visitor crossover would also occur incrementally. Impacts from the

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Proposed Project would be re-evaluated for Future Phases. During this time subsequent CEQA documents, if required, that analyze potential impacts to existing recreational facilities would be prepared.

The Los Angeles County Sheriff's Department (LASD) will continue to provide law enforcement for existing trails. The need for addition law enforcement personnel is addressed in Section 3.12.4.1, Fire and Sheriff Protection, on page 3.12-4 of the Draft PEIR. As part of Mitigation Measure PS-5, the LASD will prepare a Staffing Assessment and Safety Plan to determine the demand for additional sheriff personnel and support services for each phase of the Proposed Project.

**Response to Comment A2-10:**

The comment states that the Proposed Project meets the recreation threshold of significance for interfering with open space connectivity as noted in comment A2-6. Comment noted.

**Response to Comment A2-11:**

This comment states that the Proposed Project needs to incorporate fencing and gates that block off nighttime access and illegal activities in Phase I instead of Phase II. Phase I would include the design and construction of security fencing and gates as shown in the Draft PEIR Table 2-4 on page 2-43. The Proposed Project would be open to the public from sunrise to sunset consistent with County regulations. Nighttime security of the Proposed Project would be provided by the Los Angeles County Sheriff's Department (LASD), as detailed in the Draft PEIR on page 3.12-4. LASD estimates that the Proposed Project, at full buildout, would require two deputies, two security officers, and one sergeant per shift (day and night) to provide law enforcement services to the park, primarily related to internal park security as opposed to a substantial increase in demand for offsite service on Habitat Authority property (see response A2-9 above). These law enforcement services would help prevent and discourage unauthorized night time access to the Proposed Project. As part of Mitigation Measure PS-5, the LASD will prepare a Staffing Assessment and Safety Plan to determine the demand for additional sheriff personnel and support services for each phase of the Proposed Project.

**Response to Comment A2-12:**

This comments states that the Proposed Project meets the threshold of significance for creating capacity or service level problems for the County and surrounding trails. As discuss under response A2-9 above, the Proposed Project would not increase demand and law enforcement issues at Habitat Authority trailheads and may even decrease such demand by providing new recreation opportunities. Please also see response A2-9 regarding impacts to trails and adjacent habitats. The Los Angeles County Sheriff's Department (LASD) will continue to provide law enforcement for existing trails. The need for addition law enforcement personnel is addressed in Section 3.12.4.1, Fire and Sheriff Protection, on page 3.12-4 of the Draft PEIR. As part of Mitigation Measure PS-5, the LASD will prepare a Staffing Assessment and Safety Plan to determine the demand for additional sheriff personnel and support services for each phase of the Proposed Project.

**Response to Comment A2-13:**

The commenter requests that the calendar of special events be shared with the Habitat Authority so that rangers can be made aware of their patrol responsibilities. The County of Los Angeles Department of Parks and Recreation will provide a calendar of special events with the Habitat Authority on a monthly basis.

**Response to Comment A2-14:**

This comment states that the proposed development is not consistent with the intent of the land use for the project site because it would create an amusement park-type destination. The comment has been noted; however, the project would be consistent with uses allowed within County regional parks. As explained on Section 3.10 page 3.10-11 of the Draft PEIR, the Proposed Project would be consistent with the land use and zoning designations of the project site.

**Response to Comment A2-15:**

This comment states that a full analysis needs to be provided for impacts to the adjacent land use of the Habitat Authority's trails. The Draft PEIR on page 3.10-16 concludes that impacts to adjacent land uses would be less than significant because the majority of park users would stay within the park because it is being designed as a destination park. Visitor crossover from the Proposed Project to Habitat Authority trails would likely occur; however, it is not anticipated to result in a significant impact to adjacent recreation trails as explained in the response to comment A2-9, above.

**Response to Comment A2-16:**

The comment states that the Proposed Project is not compliant with several Los Angeles County General Plan policies in the Conservation and Natural Resources (CNR) Element and Parks and Recreation (PR) Element. Clarifying language is provided under each of the policies below.

*Policy C/NR 1.2: Protect and conserve natural resources, natural areas, and available open spaces.*

The Proposed Project would protect and conserve natural resources, natural areas, and available open spaces by restoring and enhancing existing native habitats through planting of extensive areas of currently bare or marginally vegetated ground to support wildlife movement through project site. The commenter should note that the existing environmental baseline on the site consists of extensive areas of bare or lightly vegetated areas frequently traversed by heavy equipment with associated noise, emissions, and other ongoing impacts to wildlife movement. It should be noted that adjacent urban areas, past landfill operations, and ongoing landfill maintenance activities impact wildlife movement within the project site to such an extent that the project site only offers a marginal wildlife corridor on its own. However, the Proposed Project's landscape plan would create and effectively maintain larger habitats within the wildlife corridor and provide a larger urban buffer for less tolerant species substantially improving conditions for wildlife compared to the existing baseline.

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*Policy C/NR 1.4: Create, support and protect an established network of dedicated open space areas that provide regional connectivity, between the southwestern extent of the Tehachapi Mountains to the Santa Monica Mountains, and from the southwestern extent of the Mojave Desert to Puente Hills and Chino Hills.*

As discussed under the response to Policy C/NR 1.2 above, project implementation would actually increase dedicated open space and improve habitat connectivity on the site through habitat enhancement and planting, when compared to the existing heavily impacted environmental baseline.

*Policy C/NR 1.5: Provide and improve access to dedicated open space and natural areas for all users that considers sensitive biological resources.*

As detailed in Section 2.7.2 of the Draft PEIR, the Proposed Project would provide approximately 14 miles of multi-use trails, paths, and stair climbs. Several distinct trail systems would be developed including the multi-use loop road trail, inner loop trail, running loops, ADA trails at the Visitor Center and Nike Hill, and top deck paths. Although this onsite network of trails would provide access to park visitors to the Puente Hills, onsite facilities would absorb most of this demand (see also response A2-9 above). Furthermore, to protect sensitive biological resources from impacts resulting from the improved access, the Proposed Project would implement Mitigation Measures B-8 through B-10, as stated on page 3.4-32 of the Draft PEIR.

*Policy P/R 1.10: Ensure a balance of passive and recreational activities in the development of new park facilities.*

As detailed in the Draft PEIR in Section 2.5, the County of Los Angeles conducted an extensive master plan and public engagement process. This process revealed that the preferred design by the majority of the participants was a park for all users with a mix of active and passive recreational activities. The Proposed Project represents the park design that offers a balance between passive and active recreational facilities.

*Policy P/R 5.3: Protect and conserve natural resources on County park properties, including natural areas, sanctuaries, and open space preserves.*

The response listed above under Policy C/NR 1.2 would also be applicable here. The Proposed Project would substantially improve the condition of natural resources on the project site when compared to the existing environmental baseline.

The project site has two land use designations. The western portion of the site is designated as "Public and Semi-Public" (P) in the Land Use Element of the Los Angeles County General Plan. The eastern portion of the site is designated as "Open Space - Parks and Recreation" (OS-PR) in the Hacienda Heights Community Plan. As a regional park, the Proposed Project is an allowed use under both land use designations.

**Response to Comment A2-17:**

The comment states that the Proposed Project conflicts with the intent and performance criteria of Significant Ecological Areas (SEA). It is also unclear to the reader whether or not the Rose Hills Route Alternative will require creation of a new road. The preferred alignment (Alternative 1) of the proposed access road would be located along an existing paved road currently used by the Sanitation Districts as part of their ongoing maintenance activities. The road would need to be improved as part of the future phases of development and require subsequent environmental review.

SEAs are discussed in detail in Section 3.10.4, Environmental Impacts, on pages 3.10-15-16, Section 3.4.1, Environmental Setting, and Section 3.4.4.2, Significant Ecological Areas of the Draft PEIR. The proposed Rose Hills Memorial Park easement is covered in detail on page 3-10.17.

No direct impacts to the Conceptual SEA from the proposed Rose Hills Memorial Park access road easement are expected because the Proposed Project does not propose any development within the boundaries of this SEA. Impacts from conflict of uses resulting from the proposed Rose Hills Memorial Park access road easement would be mitigated to a less than significant level with measures listed in Sections 3.3, 3.8, 3.11, and 3.14 (air, hazards, noise, and traffic) of this Draft PEIR. The Los Angeles County Department of Parks and Recreation (DPR) will continue to work with the Sanitation Districts and the surrounding community/stakeholders as part of the Puente Hills Landfill Park Master Plan and environmental documentation process. DPR will coordinate with the Habitat Authority as the designs/plans are prepared. Please refer to response to Letters A7, A8, and B1 of this Final PEIR for further clarification to the concerns raised.

**Response to Comment A2-18:**

This comment states that the Proposed Project would result in a potentially significant impact to the viewshed from Habitat Authority trails due to the addition of the proposed trail lift, Nike Hill Plaza, scenic overlook, and zip line features. All of these proposed structures would be built on Nike Hill. This comment ignores both the historic and existing environmental baseline, which is that of a historic major landfill with associated major landfill operations, including disposal of hundreds of tons of trash daily, as well as the existing baseline of extensive areas of bare ground and ongoing heavy equipment operations. Impacts are discussed more fully below.

Figure A2-1 shows the viewshed from the Native Oak Trail, located within the Habitat Authority Property, looking northwest towards Nike Hill, where the proposed structures would be located. As shown in Figure 2-5 of the Draft PEIR, the proposed structures would be built near the existing Nike guard structure and ornamental trees, north of the existing Southern California Edison (SCE) transmission line lattice towers, radio towers, and the water tank.



*Figure A2-1 View Looking Northwest from the Native Oak Trail*

Figure A2-1 shows that foreground views are dominated by the topography and vegetation of natural hills. Middleground views are dominated by the SCE transmission line lattice towers and wires. Middleground views also include views of Nike Hill and the man-made structures on the hill, including transmission line towers, a water tank, and radio towers. The proposed structures would be built just north of these structures and would not substantially change the middleground views, which are already dominated by man-made structures. Background views of the San Gabriel Mountains would not be affected by the Proposed Project because the proposed structures would not block this expansive view of the San Gabriel Mountains.

**Response to Comment A2-19:**

The commenter prefers the Low Build Alternative. Coordination between multiple agencies, policy makers, experts, communities, and local and regional stakeholders was conducted as part of the park master plan process. Creation of the initial vision for the park was reliant on the early outreach efforts to these groups. Over a six-month period in late 2015 and early 2016, the County sought and documented the public's needs and interests through community meetings and other means in order to shape the initial park vision. Six distinct park components emerged from this process that helped form the twelve (12) project objectives:

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1. Provide connections to nature
2. Provide ways for people to be healthy and active
3. Provide active sports facilities
4. Provide access
5. Alleviate pressures on the existing Puente Hills trails
6. Provide gateways to environmental stewardship

Alternative plan development sought diverse opinions to form three multi-layered, community driven designs. The main themes that emerged from the site analysis and the community/stakeholder visioning process were combined into three alternative park development concepts: Ecology, Recreate, and Upcycle. Results of public voting clearly selected Ecology as the main theme. However, family recreation and fitness dominated the selection of recreational elements that were chosen for the new park. The final park concept (Proposed Project) is an adaptation of the original Ecology concept, but retains aspects of the other themes as each design proposes unique solutions that can be transferred over to the Ecology theme.

The master plan process helped inform the alternatives selection process in the PEIR by providing three concept plans that were vetted with the community and DPR. As described above, the Proposed Project is the Ecology theme with selected elements from the Recreation and Upcycle themes. In response to comments received during the PEIR scoping period, the more passive Ecology and higher use Recreate alternatives were further defined and carried forward for analysis as the Low Build Alternative and the High Build Alternative. As such, no alternatives were rejected; instead they were further developed and analyzed as part of the PEIR.

The visitation numbers for the proposed park were developed by a team of experienced DPR staff and represent the estimated monthly attendance for the park based on attendance rates at other County facilities.

**Response to Comment A2-20:**

The comment states that the PEIR does not provide a breakdown of greenhouses gases (GHG) by structure or number of cars. However, the greenhouse gas analysis included identification of GHG emissions associated with the full buildout of the Proposed Project, including both direct and indirect impacts for building and facility operations as well as those generated by motor vehicle operation (following the construction and during operation of all of the phases simultaneously). Mitigation Measures GHG-1 through GHG-5 are included on page 3.7-19 of the Draft PEIR to reduce GHG emissions. Please refer to Table 3.7-2 on page 3.7-15 of the Draft PEIR which includes seven categories for greenhouse gas emissions: area sources, energy usage, mobile sources (vehicles), solid waste, water, and construction.

**Response to Comment A2-21:**

This comment asks for the elimination of the Schabarum-Skyline Trail improvements proposed as part of Phase II until discussions are held and an agreement reached with the Habitat Authority. The improvements to that portion of the trail include trailhead design, signage, and wayfinding design and the eastern entrance to the park from the Puente Hills Preserve

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managed by the Habitat Authority. The Schabarum-Skyline Trail is an existing County facility and increased access to this facility is not subject to approval by the Habitat Authority. However, in the interest of inter-agency coordination, the Los Angeles County Department of Parks and Recreation (DPR) will continue to work with the Sanitation Districts and the surrounding community/stakeholders as part of the Puente Hills Landfill Park Master Plan and environmental documentation process. DPR will coordinate with the Habitat Authority as the designs/plans for the trail are prepared.

**Response to Comment A2-22:**

The comment states that there is inadequate description in the Draft PEIR regarding the eastern canyon acquisition and trail development proposed as part of Phase V. DPR is aware of the Puente Hills Landfill 2002 Condition Use Permit and took it into consideration as part of the Master Plan process. Phase V is proposed 41 to 50 years from now, and the viability of land acquisition of the eastside canyons for trails and trailheads would be determined by the stakeholders they would serve. Details of projects that would be implemented in the later stages of Phases III through VI (years 21 through 75) become less certain. These projects were discussed at the Program EIR level. Under CEQA, these future projects may rely on the Program EIR as the base environmental document for environmental review. Prior to implementation, when greater detail is known, these subsequent projects (Phases III through VI) must go through another CEQA review process. They will be examined in light of the Program EIR to determine whether an additional environmental document must be prepared.

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**Letter A3 - Los Angeles County Fire Department**



**COUNTY OF LOS ANGELES**

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

PLANNING DIVISION

4/16/2016 4:37

RECEIVED

July 26, 2016

Michelle O'Conner, Planner  
Department Of Parks and Recreation  
Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020

Dear Ms. O'Conner:

**DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT, "PUENTE HILLS LANDFILL PARK MASTER PLAN," A LONG RANGE MASTER PLAN THAT OVER TIME WOULD DEVELOP A PORTION OF WHAT WAS FORMERLY THE LARGEST LANDFILL IN THE WESTERN UNITED STATES INTO A REGIONAL PARK, 13130 CROSSROADS PARKWAY SOUTH, CITY OF INDUSTRY, FFER 201600110**

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

The following are their comments:

**PLANNING DIVISION:**

We have no comments.

**LAND DEVELOPMENT UNIT:**

The Land Development Unit is reviewing the proposed project for access and water system requirements. The listed information is "preliminary" and is "subject to change" with the further review of the proposed project.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CARSON	DUARTE	HUNTINGTON PARK	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CERRITOS	EL MONTE	INDUSTRY	LAKEWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CLAREMONT	GARDENA	INGLEWOOD	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	COMMERCE	GLENDORA	IRVINDALE	LAWNDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COVINA	HAWAIIAN GARDENS	LA CANADA FLINTRIDGE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	CUDAHY	HAWTHORNE	LA HABRA	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
BRADBURY							WHITTIER

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**ACCESS REQUIREMENTS**

1. All on-site Fire Department vehicular access roads shall be labeled as "Private Driveway and Fire Lane" on the site plan along with the widths clearly depicted on the plan. Labeling is necessary to assure the access availability for Fire Department use. The designation allows for appropriate signage prohibiting parking.
2. Fire Department vehicular access roads must be installed and maintained in a serviceable manner prior to and during the time of construction. Fire Code 501.4.
3. The Fire Apparatus Access Road shall be cross-hatch on the site plan, and the width shall be clearly noted.
4. The Fire Apparatus Access Roads and designated fire lanes shall be measured from flow line to flow line.
5. In the locations not adjacent to building or a structure, provide a minimum unobstructed width of 20 feet exclusive of shoulders and an unobstructed vertical clearance "clear to sky."
6. The required 20-foot-wide driving surface shall be increased to 26 feet when fire hydrants are required. The 26-foot width shall be maintained for a minimum of 25 linear feet on each side of the hydrant location.
7. The Fire Apparatus Access Road shall have a minimum unobstructed width of 26 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building/structure, as measured by an approved route around the exterior of the building. Fire Code 503.1.1 and 503.2.2.
8. If the Fire Apparatus Access Road is separated by island, provide a minimum unobstructed width of 20 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building. Fire Code 503.1.1 and 503.2.2.
9. The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official. Fire Code 503.2.2.1.
10. Dead-end fire apparatus access roads in excess of 150 feet in length shall be

**A3-1**

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provided with an approved Fire Department turnaround. The site plan shall include the dimensions of the turnaround with the orientation of the turnaround shall be properly placed in the direction of travel of the access roadway. Fire Code 503.2.5.

11. Fire Department vehicular access roads shall be provided with a 32 foot centerline turning radius. The site plan shall indicate the centerline, inside, and outside turning radii for each change in direction. Fire Code 503.2.4.
12. Fire Apparatus Access Roads shall be designed and maintained to support the imposed load of fire apparatus weighing 75,000 pounds, and shall be surfaced so as to provide all-weather driving capabilities. Fire Apparatus Access Roads having a grade of 10 percent or greater shall have a paved or concrete surface. Fire Code 503.2.3.
13. The gradient of Fire Department Vehicle Access Roads shall not exceed 15 percent unless approved by the fire code official. Fire Code 503.2.7.
14. Abrupt changes in grade shall not exceed the maximum angles of approach and departure for fire apparatus. The first 10 feet of any angle of approach or departure or break-over shall not exceed a 10 percent change or 5.7 degrees. Fire Code 503.2.8.
  - a. Provide roadway profile and indicate angle of approach and departure at all abrupt changes in grade.
15. Provide approved signs or other approved notices or markings that include the words "NO PARKING - FIRE LANE." Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for fire apparatus access roads to clearly indicate the entrance to such road or prohibit the obstruction thereof and at intervals, as required by the Fire Inspector. Fire Code 503.3.
16. Provide a minimum five-foot wide approved firefighter access walkway leading from the Fire Department Access Road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes. Clearly identify the firefighter walkway access routes on the site plan. Indicate the slope and walking surface material. Clearly show the required width. Fire Code 504.
17. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Section 503.2.1 shall be maintained at all times. Fire Code 503.4.

**A3-1  
Cont.**

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18. Traffic Calming Devices, including but not limited to, speed bumps and speed humps shall be prohibited unless approved by the fire code official. Fire Code 503.4.1.
19. Approved building address numbers, building numbers, or approved building identification shall be provided and maintained so as to be plainly visible and legible from the street fronting the property. The numbers shall contrast with their background, be Arabic numerals or alphabet letters, and be a minimum of four inches high with a minimum stroke width of 0.5 inch. Fire Code 505.1.
20. Multiple residential and commercial buildings having entrances to individual units not visible from the street or road shall have unit numbers displayed in groups for all units within each structure. Such numbers may be grouped on the wall of the structure or mounted on a post independent of the structure and shall be positioned to be plainly visible from the street or road as required by Fire Code 505.3 and in accordance with Fire Code 505.1.
21. Fire Apparatus Access Roads shall be identified with approved signs. Temporary signs shall be installed at each street intersection when construction of new roadways allows passage by vehicles. Signs shall be of an approved size, weather resistant, and be maintained until replaced by permanent signs. Fire Code 505.2.
22. Gate Requirements
  - a. When security gates are provided, maintain a minimum access width of the required Fire Apparatus Access Road. The security gate shall be provided with an approved means of emergency operation, and shall be maintained operational at all times and replaced or repaired when defective. Electric gate operators, where provided, shall be listed in accordance with UL 325. Gates intended for automatic operation shall be designed, constructed and installed to comply with the requirements of ASTM F220. Gates shall be of the swinging or sliding type. Construction of gates shall be of materials that allow manual operation by one person. Fire Code 503.6
  - b. The method of gate control shall be subject to review by the Fire Department prior to clearance to proceed to public hearing.
  - c. The keypad location shall be located a minimum of 50 feet from the public right-of-way.
  - d. The applicant shall provide a minimum 32-foot turning radius beyond the keypad prior to the gate entrance at a minimum width of 20' for turnaround purposes.

**A3-1  
Cont.**

**A3-2**

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- e. Gated entrance design with separate access gates for ingress and egress shall provide minimum width of 20 feet clear-to-sky for each side.
- f. All locking devices shall comply with the County of Los Angeles Fire Department Regulation 5, Compliance for Installation of Emergency Access Devices.
- g. Provide gate detail prior to clearance for public hearing. The gated entrance design with a single access point (ingress and egress) shall provide for a minimum width of the Fire Apparatus Access Road clear-to-sky with all gate hardware is clear of the access way.

**A3-2  
Cont.**

**WATER SYSTEM REQUIREMENTS**

- 1. All fire hydrants shall measure 6"x 4"x 2-1/2" brass or bronze conforming to current AWWA standard C503 or approved equal, and shall be installed in accordance with the County of Los Angeles Fire Department Regulation 8.
- 2. All on-site fire hydrants shall be installed a minimum of 25' feet from a structure or protected by a two-hour rated firewall. Fire Code Appendix C106.
- 3. All required PUBLIC fire hydrants shall be installed, tested and accepted prior to beginning construction. Fire Code 501.4.
- 4. All private on-site fire hydrants shall be installed, tested, and approved prior to building occupancy. Fire Code 901.5.1.
  - a. Plans showing underground piping for private on-site fire hydrants shall be submitted to the Sprinkler Plan Check Unit for review and approval prior to installation. Fire Code 901.2 and County of Los Angeles Fire Department Regulation 7
- 5. The required fire flow for the public and on-site fire hydrants for this project will be determine with the further review of this project
  - a. The Fire Department will need the following information to determine the exact fire flow for each proposed building/structure within this development.
    - 1) The square footage;
    - 2) The type of construction; and,
    - 3) Written verification if the building will have an automatic fire sprinkler system is installed.

**A3-3**

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6. An approved automatic fire sprinkler system is required for the proposed buildings within this development. Submit design plans to the Fire Department Sprinkler Plan Check Unit for review and approval prior to installation.

**A3-3  
Cont.**

**FUEL MODIFICATION**

This property is located within the area described by the Fire Department as the Very High Fire Hazard Severity Zone. A "Preliminary Fuel Modification Plan" shall be submitted and approved prior to public hearing.

For details, please contact the Department's Fuel Modification Unit which is located at Fire Station 32, 605 North Angeleno Avenue in the City of Azusa CA 91702. They may be reached at (626) 969-5205.

**A3-4**

For any questions regarding the report, please contact FPEA Wally Collins at (323) 890-4243 or at [Wally.Collins@fire.lacounty.gov](mailto:Wally.Collins@fire.lacounty.gov).

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

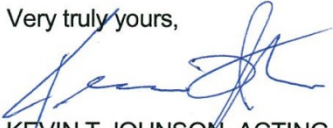
**A3-5**

**HEALTH HAZARDOUS MATERIALS DIVISION:**

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department has no comment regarding the project at this time.

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

Very truly yours,



KEVIN T. JOHNSON, ACTING CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

FV:jl

Enclosure

**Responses to Letter A3 – County of Los Angeles Fire Department**

**Response to Comment A3-1:**

This comment lists the County of Los Angeles Fire Department's access requirements. During design of each project access will be adhered to. The County of Los Angeles Fire Department has review and approval authority over project site plans ensuring all requirements are met.

**Response to Comment A3-2:**

This comment lists the County of Los Angeles Fire Department's gate requirements. During design of each project gate requirements will be adhered to. The County of Los Angeles Fire Department has review and approval authority over project site plans ensuring all requirements are met.

**Response to Comment A3-3:**

This comment lists the County of Los Angeles Fire Department's water system requirements. During design of each project water system requirements will be adhered to. The County of Los Angeles Fire Department has review and approval authority over project site plans ensuring all requirements are met.

**Response to Comments A3-4:**

This comment states that a "Preliminary Fuel Modification Plan" shall be submitted and approved prior to the public hearing on the project. This requirement has been noted.

**Response to Comment A3-5:**

This comment states that the Fire Department Forestry Division also has statutory responsibilities regarding erosion control, watershed management, rare and endangered species, vegetation, fuel modification, archaeological and cultural resources, and the County Oak Tree Ordinance. Impacts to these resources are included in the Draft PEIR in Sections 3.4 Biological Resources, 3.5 Cultural, Tribal, and Paleontological Resources, 3.8 Hazards and Hazardous Materials, and 3.9 Hydrology and Water Quality.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter A4 - South Coast Air Quality Management District**



**South Coast  
Air Quality Management District**  
21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL AND USPS:  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)

August 3, 2016

Julie Yom, Park Planner  
County of Los Angeles – Department of Parks and Recreation  
510 South Vermont Ave.,  
Los Angeles, CA 90020

**Draft Environmental Impact Report for the Proposed  
Puente Hills Landfill Park Master Plan**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (EIR) as appropriate.

The proposed project includes a trail lift system to transport guests to the peak of the park. If an emergency generator rated greater than 50 brake horsepower (bhp) is necessary, a permit from SCAQMD would be required and the SCAQMD should be identified as a CEQA responsible agency for this project. The Final EIR should also demonstrate compliance with SCAQMD Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion Engines, and 1110.2 – Emissions From Gaseous- and Liquid-Fueled Engines. If there are permit questions concerning the generator, they can be directed to Engineering and Compliance Staff at (909) 396-2315.

**A4-1**

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final EIR associated with this project.

Sincerely

*Jillian Wong*

Jillian Wong Ph.D.  
Planning & Rules Manager  
Planning, Rule Development & Area Sources

JW:JC  
LAC 160617-03  
Control Number

**Responses to Letter A4 – South Coast Air Quality Management District**

**Response to Comment A4-1:**

This comment states that if the trail lift system requires the installation of an emergency generator rated greater than 50 brake horsepower (bhp) then a permit from the South Coast Air Quality Management District (SCAQMD) would be required and that the SCAQMD should be identified as a CEQA responsible agency for this project. As of the preparation of this Final EIR, the engineering design for the trail lift system has not begun. Therefore, it is unknown if the system would require an emergency generator and if it would, what size generator it would require. The need for a permit from SCAQMD if an emergency generator rated greater than 50 bhp is required for the trail lift system has been noted and will be included in Table 1-1 of the Draft PEIR. Please refer to Section 4, Errata, of this Final PEIR.

The comment also states that the Final EIR should also demonstrate compliance with SCAQMD Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion Engines, and 1110.2 – Emissions From Gaseous- and Liquid-Fueled Engines. The requirement for the Proposed Project to comply with Rules 201, 203, 1470, and 1110.2 will be included in Table 1-1 of the Draft PEIR. Please refer to Section 4, Errata, of this Final PEIR.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter A5 - County Sanitation Districts of Los Angeles County**



**COUNTY SANITATION DISTRICTS  
OF LOS ANGELES COUNTY**

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
Telephone: (562) 699-7411, FAX: (562) 699-5422  
www.lacsd.org

GRACE ROBINSON HYDE  
*Chief Engineer and General Manager*

August 1, 2016

Julie Yom  
County of Los Angeles  
Department of Parks and Recreation  
Planning & Development Agency  
510 S. Vermont Avenue  
Los Angeles, California 90020

PLANNING DIVISION

AUG42016PM3:34

RECEIVED

Dear Ms. Yom:

**Comments on the Puente Hills Landfill Park Master Plan  
Draft Program Environmental Impact Report**

The County Sanitation Districts of Los Angeles County (Districts) has reviewed the Puente Hills Landfill (PHLF) Park Master Plan Draft Program Environmental Impact Report (DPEIR). The following are our comments on the document.

**Reclaimed Water**

The DPEIR includes a statement that 182 million gallons of reclaimed water would be required for park use at project buildout. Additional analyses will likely be required to determine if the existing reclaimed water system can meet future demand. Reclaimed water from the San Jose Creek Water Reclamation Plant (SJCWRP) might already be completely allocated for other users.

**A5-1**

**Additional Debris Basin**

Any additional debris basins should not be located on fill areas, or upgradient of fill areas.

**A5-2**

**Sewer Connection**

Additional analyses might be required to determine if the existing (receiving) sewer can meet future demand. Preliminary investigations by Districts staff indicate that the existing sewer at PHLF flows via a Districts trunk sewer to the Joint Water Pollution Control Plant in Carson, and not SJCWRP, as indicated in the DPEIR.

**A5-3**

**Reuse of Stormwater**

The DPEIR includes a proposal to use stormwater from a debris basin near PERG to recharge the existing 650,000 gallon reclaimed water tank. Combining stormwater and reclaimed water is not compatible. Therefore, a separate storage facility would be required for the reuse of stormwater.

**A5-4**

DOC #3814594

Recycled Paper 

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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Julie Yom

-2-

August 1, 2016

**Park Access Road**

Existing landfill access roads were not designed for bicycle and pedestrian use. Additional analysis might be required to confirm that they can be modified to accommodate this access from the site entrance to the top deck features of the park.

**A5-5**

**Buttress Road**

The buttress was not originally designed to accommodate a road. Therefore, a stability analysis would be necessary to determine if building a road across the buttress is feasible.

**A5-6**

**Construction on Nike Hill**

When the buttress was designed, additional structures were not considered on the Nike Hill. Therefore, additional analysis would be necessary to evaluate the feasibility of constructing a cantilevered structure and a trail lift tower in that area.

**A5-7**

**Use of Non-Filled Areas**

As discussed previously, the use of non-filled areas for park-related facilities will require Districts approval via an appropriate formal Agreement between both parties.

**A5-8**

Please contact Debra Bogdanoff at extension 2734 if you have any questions.

Very truly yours,



Chris Salomon  
Supervising Engineer  
Planning Section

CRS:DB:pb

DOC #3814594

## **Responses to Letter A5 – County Sanitation Districts of Los Angeles County**

### **Response to Comment A5-1:**

This comment is regarding a statement made in the Draft PEIR that the Proposed Project would require 182 million gallons of reclaimed water per year at project buildout. Sanitation Districts states that additional analyses will likely be required to determine if the existing reclaimed water system can meet future demand.

The statement regarding the reclaimed water requirements of the Proposed Project at full buildout is located in the Draft PEIR in Section 3.15.4 page 3.15-10. In the same section it is stated that during fiscal year (FY) 2013-2014 the San Jose Creek WRP produced 59.43 million gallons per day (mgd) or 59,430,000 gpd of reclaimed water. The Proposed Project (at full build out) would demand approximately 0.841 percent of the reclaimed water produced daily by the San Jose Creek WRP. Reclaimed water needs will be reevaluated during the planning and design phase of each of the individual project components in coordination with the Sanitation Districts.

### **Response to Comment A5-2:**

This comment states that any additional debris basins should not be located on fill areas, or upgradient of fill areas. The only basin proposed is Basin T to be located just west of the M&O Yard as shown on Figure 4.1 of Appendix F. Figure 3.6-1 of the Draft PEIR located in Section 3.6 page 3.6-3, shows the location of fill areas. The area west of the M&O Yard, where Basin T would be located, is not within a fill area or upgradient of a fill area.

### **Response to Comment A5-3:**

This comment states that additional analyses might be required to determine if the existing (receiving) sewer can meet future demand. DPR will coordinate with the appropriate agency regarding sewer service.

The comment also states that preliminary investigations by Sanitation Districts staff indicates that the existing sewer at the landfill flows via Sanitation Districts trunk sewer to the Joint Water Pollution Control Plant in Carson and not the San Jose Creek WRP, as indicated in the Draft PEIR. This comment has been noted.

### **Response to Comment A5-4:**

This comment is regarding the Proposed Project's plan to use stormwater from Basin A to recharge the 650,000-gallon tank that is located to the southwest of the Gas-to-Energy Facility. The comment states that combining stormwater and reclaimed water is not compatible. As stated in the Draft PEIR, Section 3.9.4 page 3.912, and in Appendix F Section 4.1, stormwater used to recharge the 650,000 gallon tank would be collected from Basin A after suspended sediment and debris has settled and after the water has travelled through a filtration system to further remove any debris that could potentially harm the reclaimed water system. The filtration system would allow the use of the collected stormwater in the reclaimed water system.

**Response to Comment A5-5:**

This comment states that the existing landfill access roads were not designed for bicycle and pedestrian use and that additional analyses might be required to confirm that they can be modified to accommodate this access from the site entrance to the top deck features of the park. As stated in the Draft PEIR Section 3.14-4 page 3.14-52, project access roads would be designed using applicable standards and design guidance found in the County of Los Angeles Trail Manual (adopted May 17, 2011), the California Department of Transportation Highway Design Manual (HDM, updated 2015), and the California Manual on Uniform Traffic Control Devices (MUTCD, updated 2014). Furthermore, modifications to access roads would be designed by a registered professional engineer ensuring the road is designed to safely accommodate multiple modes of transportation.

**Response to Comment A5-6:**

This comment states that the buttress was not originally designed to accommodate the access road to the Western Deck; therefore, a stability analysis would be necessary to determine if building a road across the buttress is feasible.

A preliminary assessment of the impacts to the buttress from construction of the road was conducted by Ninyo & Moore as discussed in Section 3.6 of the Draft PEIR and included as Appendix E to the Draft PEIR. The preliminary assessment indicated that the grading for the Loop Road would not have a significant effect on the stability of the buttress, as discussed in the Draft EIR on page 3.6-15. The preliminary assessment also recommended that prior to design and construction of new improvements, a detailed geotechnical evaluation, including subsurface exploration and laboratory testing, should be performed to address the potential geologic hazards at the site and geotechnical design and construction considerations. Therefore, the Proposed Project includes Mitigation Measure G-1, which would require site specific geotechnical investigations during the design of each project component, including the proposed access road across the buttress. Mitigation Measure G-1 specifically lists the preparation of a slope stability analysis to evaluate the stability of adjacent graded and natural slopes near proposed structural improvements, including the evaluation of possible effects to the western Nike Hill slope buttress.

**Response to Comment A5-7:**

This comment states that when the buttress was designed, additional structures were not considered on Nike Hill; therefore, additional analysis would be necessary to evaluate the feasibility of constructing a cantilevered structure and a trail lift tower in that area.

A preliminary slope stability analyses to evaluate the effect of the proposed loop road grading, scenic overlook, and trail lift tower on the buttress stabilization was conducted by Ninyo & Moore as discussed in Section 3.6 of the Draft PEIR and included as Appendix E to the Draft PEIR. The preliminary assessment recommended that prior to design and construction of new improvements, a detailed geotechnical evaluation, including subsurface exploration and laboratory testing, should be performed to address the potential geologic hazards at the site and geotechnical design and construction considerations. Therefore, the Proposed Project

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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includes Mitigation Measure G-1, which would require site specific geotechnical investigations during the design of each project component, including the proposed structures at Nike Hill.

**Response to Comment A5-8:**

This comment states that the use of non-filled areas for park-related facilities will require Sanitation Districts approval via an appropriate formal agreement between the County of Los Angeles and the Sanitation Districts. Comment has been noted.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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**Letter A6 - Caltrans**

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-9140  
FAX (213) 897-1337  
www.dot.ca.gov



*Serious drought.  
Help save water!*

August 4, 2016

Ms. Julia Yom  
Department of Park and Recreation  
County of Los Angeles  
510 S. Vermont Avenue  
Los Angeles, CA 90020

RE: Puente Hills Landfill Park Master Plan  
Vic. LA-60/PM 12.619  
SCH # 2015121051  
Ref. IGR/CEQA No. 151246AL-NOP  
IGR/CEQA No. 160650AL-DEIR

Dear Ms. Yom:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Proposed Project is a long range master plan that over time would develop a portion of what was formerly the largest landfill in the western United States into a regional park, providing recreation and open space for the greater Los Angeles area.

The project would generate 2,340 average daily trips and 94/187 AM/PM peak hour trips. There are 9 projects within the project vicinity that may contribute cumulative traffic impacts on the State facilities. As a reminder, the decision makers should be aware of this issue and be prepared to mitigate cumulative traffic impacts in the future.

**A6-1**

The Proposed Project would allow for performance and other special events during daylight hours. These would range in size and would likely be held primarily on holidays and weekend days when background traffic is lower and when opportunities to arrange for off-site parking are greater. For the larger events, which may draw 2,000 to 5,000 people, detailed traffic management plans will be prepared that identify potential off-site parking locations and ways to transport event-goers from there to the park. Caltrans would like to review the traffic management plans when it is available to ensure that temporary congestion will be minimized on the State facilities.

**A6-2**

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without a storm water management plan.

**A6-3**

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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Ms. Julia Yom  
August 4, 2016  
Page 2

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

**A6-4**

In addition, a truck/traffic construction management plan may be needed for this project. Traffic Management Plans involving lane closures or street detours which will impact the circulation system affecting traffic to and from freeway on/off-ramps should be coordinated with Caltrans.

**A6-5**

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 160650AL-DEIR.

Sincerely,



DIANNA WATSON  
Branch Chief  
Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

**Responses to Letter A6 – California Department of Transportation**

**Response to Comment A6-1:**

Comment noted and will be referred to decision makers for consideration.

**Response to Comment A6-2:**

Mitigation Measure T-6 (page 3.1-60 in the DEIR) requires that the County prepare and implement traffic management plans for special events. These plans will be shared with Caltrans for review and consultation. This requirement is specified in the Mitigation Monitoring and Reporting Program (MMRP) prepared as part of Section 5.0 of this Final PEIR.

**Response to Comment A6-3:**

This comment states that the project should be designed to discharge clean runoff water. The comment also notes that discharge of stormwater runoff is not permitted onto State highway facilities without a stormwater management plan. These comments are noted.

**Response to Comment A6-4:**

Comment noted. The appropriate permits will be obtained from Caltrans when required for the transportation of heavy construction equipment and/or materials requiring the use of oversized vehicles. Such deliveries will be limited to off-peak periods to the extent possible.

**Response to Comment A6-5:**

Mitigation Measure T-6 (page 3.14-60 in the Draft PEIR) requires that the County prepare a Construction Traffic Management Plan prior to the construction of any park improvements. Most construction activities will be taking place off-street within the boundaries of the landfill park site. The only improvement included in the Proposed Project that is on the public street system is the addition of crosswalks at the existing main entrance of the landfill along Crossroads Parkway South and a sidewalk on a portion of the south side of the landfill access road. Although not presently anticipated, if any temporary lane closures or street detours become necessary as part of the construction of these features which could affect traffic to and from the freeway on/off-ramps, the management plan would be coordinated with Caltrans.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter A7 - Wildlife Corridor Conservation Authority**

**WILDLIFE CORRIDOR CONSERVATION AUTHORITY**

570 WEST AVENUE 26, SUITE 100, LOS ANGELES, CALIFORNIA 90065  
TELEPHONE: (310) 589-3230  
FAX: (310) 589-2408

**GLENN PARKER**  
CHAIR  
CITY OF BREA

**MICHAEL HUGHES**  
VICE-CHAIR  
PUBLIC MEMBER  
LOS ANGELES COUNTY

**KELLY ELLIOTT**  
CALIFORNIA STATE PARKS

**BOB HENDERSON**  
CITY OF WHITTIER

**RUTH M. LOW**  
CITY OF DIAMOND BAR

SANTA MONICA MOUNTAINS  
CONSERVANCY

**CLAIRE SCHLOTTERBECK**  
PUBLIC MEMBER  
ORANGE COUNTY

**DICKIE SIMMONS**  
LOS ANGELES COUNTY  
BOARD OF SUPERVISORS

**JANE L. WILLIAMS**  
CITY OF LA HABRA HEIGHTS

August 5, 2016

Julie Yom, Park Planner  
County of Los Angeles  
Department of Parks and Recreation  
Planning Division  
510 South Vermont Avenue, Room 201  
Los Angeles, California 90020

**Puente Hills Landfill Park Master Plan Project  
Draft Program Environmental Impact Report**

Dear Ms. Yom:

The Wildlife Corridor Conservation Authority (WCCA) was created to provide for the proper planning, conservation, environmental protection, and maintenance of the habitat and wildlife corridor between Whittier-Puente Hills, Chino Hills, and the Cleveland National Forest in the Santa Ana Mountains. It is one of our main goals to ensure that sufficient continuity of habitat can be preserved to maintain a functioning wildlife corridor within this area. The Puente Hills Landfill Park Master Plan Project is located at the western end of this wildlife corridor. WCCA provided comments on this project in letters dated November 4, 2015 and February 1, 2016.

The County has a unique opportunity to complement the existing natural areas and trails in the Puente-Chino Hills wildlife corridor by implementing a park that focuses on preservation of, and connectivity to, open space; habitat restoration; and low-impact recreation. WCCA supports the comments provided by the Puente Hills Habitat Preservation Authority (Habitat Authority) in their letter dated July 28, 2016 on the Draft Program Environmental Impact Report (DPEIR).

**A7-1**

We respectfully suggest that the DPEIR has not adequately analyzed, avoided, and mitigated impacts to wildlife movement, habitat connectivity, and special status species such as coastal California gnatcatcher and their habitat. Impacts of concern include direct loss of habitat, fragmentation, noise, lighting, increased human presence and activity, unauthorized access, etc.

**A7-2**

In our previous letters, we expressed preference for the Ecology Alternative and we proposed a Habitat Connectivity Alternative. We stated that a fundamental goal of a Habitat Connectivity Alternative must be to maintain and enhance the habitat value onsite and connectivity to

**A7-3**

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A LOCAL PUBLIC AGENCY ESTABLISHED PURSUANT TO THE JOINT EXERCISE OF POWERS ACT

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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Julie Yom, County of Los Angeles  
Puente Hills Landfill Park Master Plan Project DPEIR  
August 5, 2016  
Page 2

other open space in the area. This includes habitat connectivity to the Puente Hills Preserve to the east, south, and southwest owned by the Habitat Authority; Ecology Canyon to the west; the Montebello Hills Specific Plan project site further to the west; and the San Gabriel River. It is critical to maintain the functional connectivity of habitats on and nearby the project site, such as coastal sage scrub, utilized by the threatened bird species, the coastal California gnatcatcher.

**A7-3  
Cont.**

In WCCA's previous letters, we expressed concerns regarding certain proposed intensive uses including gondola, slides (luge), zip lines, amphitheater, and bike skills.

To that end, WCCA recommends that the Low-Build Alternative presented in the DPEIR be adopted.

In addition, impacts to adjacent parkland owned by the Habitat Authority have not been adequately identified. This includes the anticipated increase in use on this adjacent and nearby parkland and need for additional maintenance and enforcement. Appropriate mitigation such as funding for increased use on the project site and adjacent and nearby parkland should be included in the Final Program Environmental Impact Report.

**A7-4**

We appreciate your consideration of these comments. Please maintain our agency on your mailing/email list for this project. If you have any questions, please contact Judi Tamasi of our staff by phone at (310) 589-3230, ext. 121, or by email at [judi.tamasi@mrca.ca.gov](mailto:judi.tamasi@mrca.ca.gov).

Sincerely,



Paul Edelman  
Chief of Natural Resources & Planning

## **Responses to Letter A7 – Wildlife Corridor Conservation Authority**

### **Response to Comment A7-1:**

This comment supports the Puente Hills Habitat Preservation Authority comment letter on the Draft PEIR dated July 28, 2016. Please refer to the responses to Letter A2 of this Final PEIR.

### **Response to Comment A7-2:**

The comment asserts that the Draft PEIR has not adequately analyzed impacts to biological resources. Comment is noted. Please refer to responses to Letters A2 and A8 of this Final PEIR.

### **Response to Comment A7-3:**

The comment references previous letters provided by the Wildlife Corridor Conservation Authority (WCCA) expressing preference for the Ecology Alternative and their proposed Habitat Connectivity Alternative. The County understands and recognizes the importance of wildlife movement corridors and the functional connectivity of habitats in the project area. The Proposed Project has been designed with passive and active recreational elements with a sensitivity to open space, native vegetation, and wildlife. Wildlife corridors impacts are further detailed in Section 3.4.4.1, Sensitive Plant and Wildlife Species, on pages 3.4-35 to -37 of the Draft PEIR. Mitigation Measures B-6 and B-8 have been amended in the errata (Final PEIR, Section 4) to address the loss of coastal sage scrub and effects on gnatcatcher and wildlife movement through the project area. Please refer to responses to Letters A2 and A8 of this Final PEIR for further clarifications.

The WCCA recommends to Low Build Alternative. Comment noted.

### **Response to Comment A7-4:**

The commenter notes that further analysis is necessary to ascertain impacts to the Puente Hills Habitat Preservation Authority (Habitat Authority). As discussed in Section 3.4 of the Draft PEIR there was an extensive literature review and as well as a habitat assessment completed. The literature review included extensive studies supported and/or participated in by the Puente Hills Habitat Preservation Authority (Authority) which manages open space immediately adjacent to the landfill. Please refer to the response to Letter A2 (Puente Hills Habitat Preservation Authority) of this Final PEIR; in particular, the response to comment A2-9.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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**Letter A8 - United States Fish and Wildlife Service**



**United States Department of the Interior**

FISH AND WILDLIFE SERVICE  
Ecological Services  
Carlsbad Fish and Wildlife Office  
2177 Salk Avenue, Suite 250  
Carlsbad, California 92008



In Reply Refer To:  
FWS-LA-16B0332-16CPA0348

August 8, 2016  
*Sent by Email*

Ms. Julie Yom  
Park Planner, County of Los Angeles  
Department of Parks and Recreation  
Planning Division  
510 Vermont Avenue, Room 201  
Los Angeles, California 90020

**Subject:** Draft Program Environmental Impact Report for the Puente Hills Landfill Park Master Plan, Unincorporated Los Angeles County, California

Dear Ms. Yom:

The U.S. Fish and Wildlife Service (Service) has reviewed the Draft Program Environmental Impact Report (Draft PEIR) for the proposed Puente Hills Landfill Park Master Plan (Plan), located primarily in an unincorporated area of Los Angeles County, California. The proposed project includes construction and operation of active and passive recreational facilities and associated infrastructure on about 142 acres of the 1,365-acre landfill site by the County of Los Angeles Department of Parks and Recreation (DPR). The Plan also addresses ongoing maintenance of the landfill by the Sanitation Districts of Los Angeles County (Sanitation Districts) and associated maintenance facilities. The Puente Hills Landfill is located south of the 60 Freeway; north of a preserved open space which is managed by the Puente Hills Habitat Preservation Authority; west of residential development in Hacienda Heights; and east of the Rose Hills Memorial Park.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has a legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. Specifically, the Service administers the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*), and the Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*) and provides support to other Federal agencies in accordance with the provisions of the Fish and Wildlife Coordination Act (16 U.S.C. 661 *et seq.*).

The Biological Resources section of the Draft PEIR is based on a one-day field assessment and literature review of the proposed project vicinity. A total of 15 special status/sensitive species have a moderate to high potential to occur on site but were not detected during the one-day assessment. We are not aware of any focused surveys for federally listed or sensitive species in the proposed project area. While potential impacts to biological resources are generally described, there is insufficient

**A8-1**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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Mr. Julie Yom (FWS-LA-16B0332-16CPA0348)

2

information available to provide a detailed assessment of the actual extent of impacts to biological resources in and adjacent to the project area.

According to the Draft PEIR, the proposed project area is occupied by the federally threatened coastal California gnatcatcher (*Poliophtila californica californica*, gnatcatcher) and a portion of the proposed project lies within designated critical habitat for the gnatcatcher (72 FR 72010). The function of critical habitat through the proposed project area is to provide primary connectivity and genetic interchange between significant gnatcatcher populations in the Puente Hills and the Montebello Hills. The Montebello Hills support the largest concentration of gnatcatchers within the northern range of the species. The potential for dispersal through the proposed project area is tenuous due to the extent of existing development and associated infrastructure. Remaining fragmented patches of coastal sage scrub and open space within the proposed project area provide important stepping stones for gnatcatcher population dispersal.

**A8-1  
Cont.**

Our primary concerns with respect to this project are the proposed active recreational uses that will impact the quality and extent of habitat available to support wildlife movement through the project area. In general, we recommend recreational facilities are designed and located in a manner that both accommodates wildlife movement and provides a greater buffer between habitat and the noise and disturbance associated with recreational uses. We offer the following specific comments and recommendations regarding project-associated biological impacts based on our review of the Draft PEIR and our knowledge of declining habitat types and species within Los Angeles County. These comments are provided in keeping with our agency's mission: "Working with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people."

1. **Surveys** – Several of the proposed mitigation measures involve conducting surveys for sensitive plants and wildlife prior to grading the site (i.e., B-1, B-3, B-5) or prior to issuance of a grading permit (i.e., B-2, B-4, B-5, B-6, B-11, B-12). We recommend that additional focused surveys are conducted prior to finalizing the PEIR. The survey information should be used to assist in designing the proposed project in a manner that avoids and minimizes direct and indirect impacts to federally listed species, sensitive species, and wildlife movement corridors to the extent possible.

**A8-2**

2. **Impacts to Vegetation Communities** – The full extent of impacts associated with the proposed project are not included in the Biological Resources section of the Draft PEIR. The footprint of impacts used as the basis for the analysis (Draft PEIR, Figure 3.4-2 and Table 3.4-1) does not appear to include all areas identified as part of the proposed project footprint (DEIR, Figure 2-5). The Final PEIR should include the entire footprint of disturbance associated with all components of the project (i.e., limits of proposed facilities, roads, trails, grading, temporary access, staging areas, and fuel modification areas, as applicable). Currently mitigation for impacts to vegetation communities is limited to restoration of temporary impact areas (Mitigation Measure B-6) and oak trees over 8 inches diameter at breast height (Mitigation Measure B-7). Permanent impacts to natural vegetation communities should be mitigated through restoration, conservation, and management of functional vegetation at a 2:1 ratio within the Sanitation Districts property. The restoration and conservation should be configured to provide a corridor for the movement of wildlife through an area of the landfill that is protected from disturbances. Native landscaping planted within recreational

**A8-3**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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Mr. Julie Yom (FWS-LA-16B0332-16CPA0348)

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facilities will not provide equivalent function for wildlife as existing vegetation communities due to the regular disturbance that will result from proposed recreational uses.

In order for the County to conclude that an impact is temporary, the Final PEIR should evaluate the location and type of vegetation that will be temporarily impacted and determine if alterations in topography and/or drainage patterns resulting from the project will impede restoration of the vegetation community. If the same vegetation community cannot be re-established then the impact is permanent and should be mitigated as such.

**A8-3  
Cont.**

- 3. Impacts to the Gnatcatcher** – As currently proposed, the project will impact 12.5 acres of coastal sage scrub (potential breeding, feeding, and sheltering habitat for the gnatcatcher) and 15.2 acres of critical habitat. Proposed mitigation for impacts to the gnatcatcher (Mitigation Measure B-4) includes conducting protocol surveys prior to construction or site preparation and providing a 500-foot disturbance-free buffer between active nests and construction. If gnatcatchers are found in the proposed project footprint during protocol surveys then our agency should be contacted to assist in determining if the project may result in take<sup>1</sup> of the gnatcatcher.

Our primary concern with the design of the proposed project is the extent of impacts and associated active and passive recreational uses that are located within critical habitat for the gnatcatcher. Critical habitat through this area is limited to an extremely narrow band, part of which is already developed. Dispersal of gnatcatchers is critical to demographic and genetic health of the populations in the Puente/Chino Hills (72FR72010). The proposed project will construct a primary access road, zip line, slides, parking lot, trail lift, and bridge/overlook within critical habitat. In addition, the proposed project includes a maintenance yard, children's play area, and outdoor performance space adjacent to critical habitat. The noise and disturbance associated with these facilities will degrade the quality of any remaining habitat for the gnatcatcher in the vicinity. We recommend the DPR consider reducing the extent of proposed active recreational facilities (e.g., slides, zip-lines, outdoor performance area, bike skills area, and child's playground) and increasing the amount and quality of the native vegetation communities, which will also provide increased passive recreation/nature education for the public. In addition we recommend the following design alternatives to maintain a corridor of open space through critical habitat that has minimum disturbance and will accommodate dispersal of the gnatcatcher through the property:

**A8-4**

- a. Use the existing switchback road through non-native woodlands on the north side of the site to provide primary access to the proposed facilities and eliminate the primary access road through gnatcatcher critical habitat on the west side of the site. Parking areas could be located on the north side of the Western and Eastern Decks.
- b. Locate the proposed maintenance yard adjacent to the existing Gas-to-Energy Facility I, in an area currently vegetated with non-native woodlands, north or east of the facility.

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<sup>1</sup> Section 9 of the Endangered Species Act prohibits the take of endangered and threatened species without special exemption. Take is defined as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or to attempt to engage in any such conduct. Harm is further defined by the Fish and Wildlife Service to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing essential behavior patterns, including breeding, feeding, or sheltering.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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Mr. Julie Yom (FWS-LA-16B0332-16CPA0348)

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- c. Co-locate any active recreational uses to minimize the overall extent of noise and disturbance within the site, and locate active recreational facilities in areas furthest away from natural vegetation communities and sensitive wildlife.
- d. Eliminate areas of turf that will require regular irrigation to limit the spread of invasive ant species, such as the Argentine ant (*Linepithema humile*). An increase in the number of invasive ants could reduce food resources for the gnatcatcher (Bolger *et al.* 2000) and/or increase the potential for ant predation on gnatcatcher nestlings (Sockman 1997; Atwood and Bontrager 2001).

**A8-4  
Cont.**

- 4. Impacts to Large Mammals** – Both deer and coyote were observed during the one-day field assessment (Draft PEIR, Appendix C). Bobcats and mountain lions are also known to occur in the project vicinity.<sup>2</sup> Large predators, in particular, play an important role in maintaining the ecological integrity of remaining open space areas in southern California (Soulé *et al.* 1988, Crooks and Soulé 1999). The presence of coyotes and bobcats has been shown to be negatively associated with the distribution and abundance of smaller predators (e.g., raccoons and feral cats), which often prey upon songbirds (Crooks and Soule 1999). A corridor of native habitat through the site for the gnatcatcher may also support movement of large mammals through the site. Surveys should be conducted to evaluate current large mammal movement pathways to assist in determining the most appropriate locations for maintaining wildlife movement through the site.

**A8-5**

In summary, we recommend that the DPR not approve the Draft PEIR until additional biological surveys are conducted and facilities are designed to minimize impacts to gnatcatcher and other wildlife within the property. The Service is available to assist the DPR in developing measures to resolve our concerns for maintaining connectivity through the proposed Puente Hills Landfill Park.

**A8-6**

We appreciate the opportunity to comment on the subject Draft PEIR. If you have any questions regarding these comments, please contact Christine Medak of this office at 760-431-9440, extension 298.

Sincerely,

JONATHAN  
N SNYDER

Digitally signed by  
JONATHAN SNYDER  
Date: 2016.08.08  
16:42:28 -07'00'

for Karen A. Goebel  
Assistant Field Supervisor

cc:

Scott Harris, California Department of Fish and Wildlife  
Andrea Gullo, Puente Hills Habitat Preservation Authority

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<sup>2</sup> Information received from A. Gullo, Puente Hills Habitat Preservation Authority, on, August 4, 2016.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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Mr. Julie Yom (FWS-LA-16B0332-16CPA0348)

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**LITERATURE CITED:**

- Atwood, J. L. and D. R. Bontrager. 2001. California Gnatcatcher (*Polioptila californica*). Number 574 in A. Poole and F. Gill, editors. The birds of North America Philadelphia, Pennsylvania.
- Bolger, D.T, Suarez, A.V., Crooks, K.R., Morrison, S.A., T.J. Case. 2000. Arthropods in Urban Habitat Fragments in Southern California: Area, Age, and Edge Effects. Ecological Applications. Vol. 10. No. 4. August 2000. pp. 1230-1248.
- Crooks, K. and M. Soule. 1999. Mesopredator release and avifaunal extinctions in a fragmented system. Nature 400:563-566.
- Sockman, K. 1997. Variation in life-history traits and nest-site selection affects risk of nest predation in the California gnatcatcher. The Auk 114:324-332.
- Soulé, M. E., D. T. Bolger, A. C. Roberts, R. Sauvajot, J. Wright, M. Sorice, and S. Hill. 1988. Reconstructed dynamics of rapid extinctions of chaparral-requiring birds in urban habitat islands. Conservation Biology 2:75-92.

## **Responses to Letter A8 – United States Fish and Wildlife Service**

### **Response to Comment A8-1:**

The commenter asserts there is insufficient information provided to provide a detailed assessment of the actual extent of impacts to biological resources in an adjacent to the project area. As discussed in Section 3.4, Biological Resources, of the Draft PEIR there was an extensive literature review as well as a habitat assessment completed. The literature review included extensive studies supported and/or participated in by the Puente Hills Habitat Preservation Authority (Authority) which manages open space immediately adjacent to the landfill. The federally-listed threatened coastal California gnatcatcher is present and occurs in the project area and is well documented, including the USFWS designation of critical habitat, as noted in the comment letter.

The commenter's concern is that the proposed project area provides primary connectivity through critical habitat from the Montebello Hills to the Puente Hills for gnatcatchers. Coastal sage scrub and other native vegetation communities are planned as part of the overall Park Master Plan. Please refer to the corresponding Mitigation Measures B-6 and B-8 that have been clarified as part of the Section 4, Errata, of this Final PEIR to further address these issues.

### **Response to Comment A8-2:**

The commenter requests additional surveys be conducted for sensitive plants and wildlife prior to finalizing the PEIR. Please refer to Response to Comment A8-1. As this is a programmatic document, corresponding mitigation measures have been developed to coincide with development that will be used to avoid and minimize direct and indirect impacts to special-status species and wildlife corridors. Specifically, Mitigation Measures B-6 and B-8 have been amended in Section 4, Errata, to further address impacts to special status species, sensitive habitats and wildlife corridors, which includes coordination with the USFWS and CDFW.

### **Response to Comment A8-3:**

The commenter asserts that permanent impacts to natural vegetation communities be mitigated through restoration, conservation, and management of functional vegetation at a 2:1 ratio. Furthermore, the comments state that all project components be analyzed prior to the finalization of the PEIR. Please refer to Response to Comments A8-1 and -2. As this is a programmatic document impacts will be phased and not all components are currently fully determined. Table 3.4-1 provided a breakdown of the vegetation communities present on the project site, however as noted previously, due the programmatic nature not all impacts are able to be broken down to direct (permanent and temporary) and indirect.

Details of projects that would be implemented in the later phases become less certain. Under CEQA, these future projects may rely on the Program EIR as the base environmental document for environmental review. Prior to implementation, when greater detail is known (e.g. footprints; staging areas), these subsequent projects (Phases III through VI) must go through another CEQA review process. They will be examined in light of the Program EIR to determine whether an additional environmental document must be prepared. If the Lead Agency finds that the subsequent activity would not result in new effects or require new mitigation measures, the

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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Lead Agency can approve the activity as being within the scope of the project covered by the Program EIR and no new environmental document would be required (CEQA Guidelines §15168). Otherwise, subsequent environmental documentation must be prepared. If subsequent documentation is prepared, the environmental analyses would be tiered from the Program EIR by incorporating by reference its general discussions and the analysis of cumulative impacts. Subsequent environmental documents would be focused on project- and site-specific impacts.

**Response to Comment A8-4:**

The commenter's primary concern is the impacts to critical habitat for gnatcatcher. The comments include several recommendations on park design, specifically active recreation facilities. Recommendations are noted. Please refer to Response to Comments A8-1 and -2.

**Response to Comment A8-5:**

The commenter requests additional studies be conducted to evaluate current large mammal movement pathways to assist in determining the most appropriate locations for maintaining wildlife movement through the site. Specific studies cited by the commenter include Soulé et al. 1988 and Crooks and Soulé 1999. Please refer to Response to Comment A8-1. The majority of the project site is disturbed/developed as detailed in Section 3.4.1.2, Site Specific Setting, of the Draft PEIR and those areas provide minimal access to wildlife due to ongoing post-closure landfill maintenance activities. Wildlife corridor impacts are further detailed in Section 3.4.4.1, Sensitive Plant and Wildlife Species, on pages 3.4-35 to -37 of the Draft PEIR. Mitigation Measures B-6 and B-8 have been amended in Section 4, Errata, of this Final PEIR to address the loss of coastal sage scrub and effects on gnatcatcher and wildlife movement through the project area. Phase III of the Proposed Project includes the under-planting of the non-native slopes with native planting for enhancement of the wildlife corridor. The County will work collaboratively with the respective agencies to help maintain wildlife corridor connectivity to the extent practicable.

**Response to Comment A8-6:**

The commenter requests additional studies be conducted and the project be redesigned to minimize impacts to gnatcatcher and other wildlife within the property prior to the finalization of the PEIR. Please refer to Response to Comments A8-1 through A8-5.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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**Letter A9 - City of Whittier**



*City of Whittier*

13230 Penn Street, Whittier, California 90602-1772  
(562) 567-9999 www.cityofwhittier.org

Joe Vinatieri  
Mayor

Bob Henderson  
Mayor Pro Tem

Cathy Warner  
Council Member

Josué Alvarado  
Council Member

Fernando Dutra  
Council Member

Jeffrey W. Collier  
City Manager

August 3, 2016

PLANNING DIVISION  
AUG82016PM3:01  
RECEIVED

Julie Yom, Park Planner  
County of Los Angeles  
Department of Parks and Recreation Planning Division  
510 S. Vermont Avenue, Room 201  
Los Angeles, CA 90020

Dear Ms. Yom:

**RE: Puente Hills Landfill Park Master Plan**

The City of Whittier has reviewed the Puente Hills Landfill Park Master Plan Draft Environmental Impact Report (DEIR). After careful study of the DEIR, the previous concept plans presented in community workshops, and the detailed comments by the Puente Hills Habitat Preservation Authority (PHHPA) regarding the DEIR, the City is in agreement with a number of concerns and issues raised by the PHHPA in their July 28, 2016 comments.

The City echoes the multi-faceted concerns of the PHHPA report regarding the project's impact on biological resources, noise, recreation, public services, aesthetics, and land use on the Puente Hills Landfill Park and Puente Hills Preserve. We are specifically concerned with the Master Plan construction design zones that would run directly through and adjacent to critical Coastal Sage Shrub nesting habitat of the federally and state protected Coastal California Gnat Catcher. As the Puente Hills are among the last known habitats in the Los Angeles area for many animals that are considered California Species of Special Concern with some near extinction in the Los Angeles area, the proposed project footprint would sever these federally protected and designated migration connections and linkages between existing Rio Hondo, Puente Hills, Puente-Chino Hills and Hacienda Hills significant ecological areas.

**A9-1**

The City joins the Puente Hills Habitat Preservation Authority to support the Low Build Alternative of the Master Plan. We agree the proposed project has an opportunity to complement and enhance the region for the benefit of the community but should do so without

**A9-2**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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Page Two  
Julie Yom  
August 3, 2016

diminishing the biological value of the area and adjacent lands owned by other public agencies.

**A9-2  
Cont.**

The City thanks Jan Sandgren of Withers & Sandgren and the Los Angeles County Department of Parks and Recreation for the July 12, 2016 presentation to the Whittier City Council of the Draft Environmental Impact Report.

For the reasons expressed above, the City of Whittier's preference for the Puente Hills Landfill Park Master Plan is the Low Build Alternative. Please contact Greg Alaniz, the City's Director of Parks, Recreation and Community Services, at [galaniz@cityofwhittier.org](mailto:galaniz@cityofwhittier.org) or 562.567.9400 for further information.

**A9-3**

Sincerely,



Joe Vinatieri  
Mayor

cc: The Honorable Don Knabe, Fourth District  
Whittier City Council  
Puente Hills Habitat Preservation Authority

**Responses to Letter A9 – City of Whittier**

**Response to Comment A9-1:**

This comment states that the City of Whittier also shares similar concerns as expressed by the Puente Hills Habitat Preservation Authority (Habitat Authority) regarding the Proposed Project's impacts to biological resources, noise, recreation, public services, aesthetics, and land use. For responses to the concerns raised by the Habitat Authority please see the responses to Letter A2 in this Final PEIR.

**Response to Comment A9-2:**

This comment states that the City of Whittier joins the Habitat Authority in support of the Low Build Alternative. Comment has been noted.

**Response to Comment A9-3:**

This comment thanks the County of Los Angeles for its presentation of the Draft PEIR to the Whittier City Council on July 12, 2016 and expresses the City's preference of the Low Build Alternative. Comment has been noted.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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**Letter A10 - City of El Monte City Manager Jesus Gomez**



**CITY OF EL MONTE  
CITY MANAGER'S OFFICE**

Jesus M. Gomez  
*City Manager*

Alex G. Hamilton  
*Assistant City Manager*

August 8, 2016

Ms. Julie Yom, Park Planner  
County of Los Angeles  
Department of Parks and Recreation  
510 S. Vermont Ave  
Los Angeles, CA 90020

Dear Ms. Yom:

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
DRAFT ENVIRONMENTAL IMPACT REPORT**

Thank you for the opportunity to review the Puente Hills Park Master Plan Draft Environmental Impact Report (DEIR). We strongly support the Proposed Project as described and analyzed in the DEIR. We agree with the DEIR that the Proposed Project is the environmentally superior alternative, would result in beneficial impacts to recreation, aesthetics, and open space, and meet all of the project objectives detailed in the DEIR, particularly balancing the needs of the overall region along with the complex site constraints and the competing needs and interests of the adjacent entities.

The Proposed Project at the Puente Hills Landfill will transform the closed Puente Hills Landfill into a "Park for All" which fills a critical need for parkland in the region, and offers diverse, healthy and active outdoor recreational experiences and programming for all. The proposed project represents reuse and land recycling that is consistent with sustainable practices. Outdoor recreational activities will include hiking, biking and equestrian multi-use trails, nature play, bike skills areas, fitness programs, dog park, zip lines, art installations and performances. Plantings will emphasize native vegetation including sweeping coastal sage scrub, wildflowers and grasslands. Picnic and open play areas will be ideal for family gatherings. Panoramic views will highlight the San Gabriel Mountains National Monument and regional landmarks.

The Proposed Project will also offer educational programs focusing on the following issues: sustainable living, getting to zero waste, natural and cultural history of the San Gabriel Valley, native wildlife and habitat, landfill history and innovation. In addition, volunteer programs and a native plant nursery will offer visitors numerous ways to get involved with the park.

**A10-1**

11333 VALLEY BOULEVARD, EL MONTE, CALIFORNIA 91731-3293 / (626) 580-2001 / FAX (626) 453-3612  
EMAIL: [citymanager@elmonteca.gov](mailto:citymanager@elmonteca.gov) WEBSITE: [www.elmonteca.gov](http://www.elmonteca.gov)

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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August 8, 2016  
Ms. Julie Yom, Park Planner

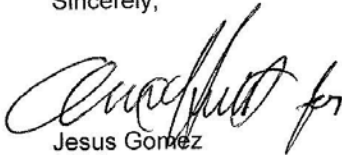
Our staff participated in the workshops and outreach activities regarding the Proposed Project. In addition, our City Council received a presentation from your staff on the project and appreciated the opportunity to comment on the merits of the project in such a public manner. The Proposed Project has incorporated and reflects the input we provided during the public participation process.

As you are aware, the City of El Monte is park deficient and any additions or improvements to the overall County park network is welcomed by the City. The Countywide network of open space is crucial to the overall quality of life for all County residents. In addition, the connectivity of County open space to the local cities such as El Monte is also very important.

Thank you for listening to us and giving us opportunities to be a part of this important planning effort to create the next regional park in Los Angeles County.

**A10-1  
Cont.**

Sincerely,



Jesus Gomez  
City Manager  
City of El Monte

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter A11 - City of El Monte Councilman Jerry Velasco**



**CITY OF EL MONTE  
CITY COUNCIL'S OFFICE**

Jerry G. Velasco  
Councilman

August 8, 2016

Ms. Julie Yom, Park Planner  
County of Los Angeles  
Department of Parks and Recreation  
510 S. Vermont Ave  
Los Angeles, CA 90020

Dear Ms. Yom:

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
DRAFT ENVIRONMENTAL IMPACT REPORT**

Thank you for the opportunity to review the Puente Hills Park Master Plan Draft Environmental Impact Report (DEIR). We strongly support the Proposed Project as described and analyzed in the DEIR. We agree with the DEIR that the Proposed Project is the environmentally superior alternative, would result in beneficial impacts to recreation, aesthetics, and open space, and meet all of the project objectives detailed in the DEIR, particularly balancing the needs of the overall region along with the complex site constraints and the competing needs and interests of the adjacent entities.

The Proposed Project at the Puente Hills Landfill will transform the closed Puente Hills Landfill into a "Park for All" which fills a critical need for parkland in the region, and offers diverse, healthy and active outdoor recreational experiences and programming for all. Outdoor recreational activities will include hiking, biking and equestrian multi-use trails, nature play, bike skills areas, fitness programs, dog park, zip lines, art installations and performances. Plantings will emphasize native vegetation including sweeping coastal sage scrub, wildflowers and grasslands. Picnic and open play areas will be ideal for family gatherings. Panoramic views will highlight the San Gabriel Mountains National Monument and regional landmarks.

The Proposed Project will also offer educational programs focusing on the following issues: sustainable living, getting to zero waste, natural and cultural history of the San Gabriel Valley, native wildlife and habitat, landfill history and innovation. In addition, volunteer programs and a native plant nursery will offer visitors numerous ways to get involved with the park.

**A11-1**

11333 VALLEY BOULEVARD, EL MONTE, CALIFORNIA 91731-3293 / (626) 580-2001 / FAX (626) 580-2291  
EMAIL: [Eishigaki@ci.el-monte.ca.us](mailto:Eishigaki@ci.el-monte.ca.us) WEBSITE: [www.ci.el-monte.ca.us](http://www.ci.el-monte.ca.us)

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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August 8, 2016  
Ms. Julie Yom, Park Planner

Our staff participated in the workshops and outreach activities regarding the Proposed Project. In addition, our City Council received a presentation from your staff on the project and appreciated the opportunity to comment on the merits of the project in such a public manner. The Proposed Project has incorporated and reflects the input we provided during the public participation process.

As you are aware, the City of El Monte is park poor and any additions or improvements to the overall County park network is welcomed by the City. The Countywide network of open space is crucial to the overall quality of life for all County residents. In addition, the connectivity of County open space to the local cities such as El Monte is also very important.

Thank you for listening to us and giving us opportunities to be a part of this important planning effort to create the next regional park in Los Angeles County.

**A11-1  
Cont.**

Sincerely,



Jerry Velasco  
Councilman  
City of El Monte

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter A12 - City of El Monte Mayor André Quintero**

**CITY OF EL MONTE**  
**CITY COUNCIL'S OFFICE**

André Quintero  
*Mayor*

August 8, 2016

Ms. Julie Yom, Park Planner  
County of Los Angeles  
Department of Parks and Recreation  
510 S. Vermont Ave  
Los Angeles, CA 90020

Dear Ms. Yom:

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
DRAFT ENVIRONMENTAL IMPACT REPORT**

Thank you for the opportunity to review the Puente Hills Park Master Plan Draft Environmental Impact Report (DEIR). We strongly support the Proposed Project as described and analyzed in the DEIR. We agree with the DEIR that the Proposed Project is the environmentally superior alternative, would result in beneficial impacts to recreation, aesthetics, and open space, and meet all of the project objectives detailed in the DEIR, particularly balancing the needs of the overall region along with the complex site constraints and the competing needs and interests of the adjacent entities.

The Proposed Project at the Puente Hills Landfill will transform the closed Puente Hills Landfill into a "Park for All" which fills a critical need for parkland in the region, and offers diverse, healthy and active outdoor recreational experiences and programming for all. Outdoor recreational activities will include hiking, biking and equestrian multi-use trails, nature play, bike skills areas, fitness programs, dog park, zip lines, art installations and performances. Plantings will emphasize native vegetation including sweeping coastal sage scrub, wildflowers and grasslands. Picnic and open play areas will be ideal for family gatherings. Panoramic views will highlight the San Gabriel Mountains National Monument and regional landmarks.

The Proposed Project will also offer educational programs focusing on the following issues: sustainable living, getting to zero waste, natural and cultural history of the San Gabriel Valley, native wildlife and habitat, landfill history and innovation. In addition, volunteer programs and a native plant nursery will offer visitors numerous ways to get involved with the park.

**A12-1**

11333 VALLEY BOULEVARD, EL MONTE, CALIFORNIA 91731-3293 / (626) 580-2001 / FAX (626) 453-3612  
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**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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August 8, 2016  
Ms. Julie Yom, Park Planner

Our staff participated in the workshops and outreach activities regarding the Proposed Project. In addition, our City Council received a presentation from your staff on the project and appreciated the opportunity to comment on the merits of the project in such a public manner. The Proposed Project has incorporated and reflects the input we provided during the public participation process.

As you are aware, the City of El Monte is park deficient and any additions or improvements to the overall County park network is welcomed by the City. The Countywide network of open space is crucial to the overall quality of life for all County residents.

Thank you for listening to us and giving us opportunities to be a part of this important planning effort to create the next regional park in Los Angeles County.

Sincerely,



André Quintero  
Mayor  
City of El Monte

**A12-1  
Cont.**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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**Letter A13 - Rio Hondo College**



TERESA DREYFUSS  
SUPERINTENDENT/PRESIDENT

BOARD OF TRUSTEES

NORMA EDITH GARCIA

GARY MENDEZ

MARY ANN PACHECO

VICKY SANTANA

MADELINE SHAPIRO

August 8, 2016

Ms. Julie Yom, Park Planner  
County of Los Angeles  
Department of Parks and Recreation  
510 South Vermont Avenue  
Los Angeles, CA 90020

Dear Ms. Yom:

RE: PUENTE HILLS LANDFILL PARK MASTER PLAN DRAFT  
ENVIRONMENTAL IMPACT REPORT

Thank you for the opportunity to review the Puente Hills Park Master Plan Draft Environmental Impact Report (DEIR). Rio Hondo College supports the Proposed Project as described and analyzed in the DEIR. The College agrees that the DEIR would result in beneficial impacts to recreation, aesthetics, and open space, and would be aligned with the College's mission of promoting lifelong learning, especially for those who are most in need of learning opportunities. The College particularly appreciates the DEIR's capacity to balance the needs of the overall region along with the complex site constraints and the competing needs and interests of the adjacent entities.

The Proposed Project at the Puente Hills Landfill will transform the closed Puente Hills Landfill into a "Park for All" which would address a critical need for parkland in the region and offer diverse, outdoor recreational experiences. Outdoor recreational activities would include hiking, biking and equestrian multi-use trails, bike skills areas, and fitness programs. The College is keenly interested in the connection of existing hiking trails within and around the campus with the multi-use trails to be featured in the "Park for All". The College's intention to build a Rio Plaza to facilitate multi-modal transportation to campus would address the shared goal of maximizing access to and from the Park.

The Proposed Project would also offer educational programs focusing on the following issues: sustainable living, cultural history of the San Gabriel Valley, native wildlife and habitat, landfill history and innovation. Rio Hondo College remains highly interested in providing course offerings that create experiential learning opportunities in the areas of environmental technology, cultural history, and physical fitness. The College's existing relationships with over a dozen K-12 school districts can be leveraged to create elementary and middle school partnerships. The DEIR's emphasis on native vegetation - including sweeping coastal sage scrub, wildflowers and grasslands - complements the College's ongoing efforts to plant drought-resistance, native vegetation. A native plant nursery would offer Rio Hondo students additional ways to volunteer with the park.

RIO HONDO COMMUNITY COLLEGE DISTRICT • 3600 WORKMAN MILL ROAD • WHITTIER, CALIFORNIA 90601-1616 • VOICE 562-692-0921 • FAX 562-699-7386 • [www.riohondo.edu](http://www.riohondo.edu)

**A13-1**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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Rio Hondo College engaged in several outreach activities regarding the Proposed Project, including participation in a community stakeholder interview in August 2015, hosting a town hall meeting with the campus community in October 2015, and ongoing participation on the Technical Advisory Committee from August 2015 to June 2016. The College's involvement culminated in the Board's passage of a resolution at the May 2016 Board of Trustees Meeting which articulated the Board's support of the Proposed Project. The Proposed Project reflects the input the College provided during the public participation process. Thank you for giving Rio Hondo College the opportunity to provide input on the DEIR.

**A13-1  
Cont.**

Sincerely,



Russell Castañeda Calleros  
Director of Government and Community Relations

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter A14 - Los Angeles County Arts Commission**

Enriching Lives



**RE:** Puente Hills Landfill Park Master Plan  
**TO:** Kathline King, Chief of Planning  
Planning and Development Agency - Department of Parks and Recreation  
**FROM:** Laura Zucker, Executive Director *[Signature]*  
Los Angeles County Arts Commission  
**CC:** Mayen Alcantara, Civic Art Project Manager  
**DATE:** August 8, 2016

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REVIEW OF THE ENVIRONMENTAL IMPACT REPORT AND SUPPORT FOR THE  
PROPOSED PUENTE HILL LANDFILL PROJECT

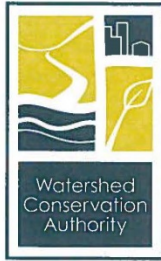
The proposed Puente Hills Master Plan goal of offering a "Park for All" benefits a diverse community of LA County residents and fills a critical need for parkland in the region. By offering a range of recreational, programming amenities and integrated design elements for education and interpretation, the proposed project for the future park at the closed Puente Hills Landfill creates a unique regional destination that is in balance with environmental sustainability and wildlife habitat connectivity. This project will attract new audiences, particularly underrepresented or disadvantaged populations that may initially be drawn to the site through a desire for fitness and a connection to outdoor activities. Due to educational programming and the thoughtful integration of art as a creative strategy, this same audience will find gateways to nature and the science of the landfill as future stewards of the site.

**A14-1**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter A15 - Watershed Conservation Authority**



August 8, 2016

Ms. Julie Yom, Park Planner  
County of Los Angeles  
Department of Parks and Recreation  
510 S. Vermont Ave  
Los Angeles, CA 90020

Dear Ms. Yom:

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
DRAFT ENVIRONMENTAL IMPACT REPORT**

**GOVERNING BOARD**

**Brian Mejia,**  
**Chair**  
Designee for Michael D.  
Antonovich  
Los Angeles County Board of  
Supervisors, 5th District

**Janet Chin,**  
**Vice Chair**  
Designee for Hilda Solis  
Los Angeles County Board of  
Supervisors, 1st District

**Karly Katona**  
Designee for Mark Ridley-  
Thomas  
Los Angeles County Board of  
Supervisors, 2nd District

**Connie Sziebl**  
Designee for Don Knabe  
Los Angeles County Board of  
Supervisors, 4th District

**Dan Arrighi**  
Rivers and Mountains  
Conservancy

**Frank Colonna**  
Rivers and Mountains  
Conservancy

**Roberto Uranga**  
Rivers and Mountains  
Conservancy

**EX OFFICIO MEMBER**  
**Terri Grant**  
Designee for Gail Farber,  
Director  
Los Angeles County  
Department of Public Works

**EXECUTIVE OFFICER**  
**Mark Stanley**

Thank you for the opportunity to review the Puente Hills Park Master Plan Draft Environmental Impact Report (DEIR). We strongly support the Proposed Project as described and analyzed in the DEIR. We agree with the DEIR that the Proposed Project is the environmentally superior alternative, would result in beneficial impacts to recreation, aesthetics, and open space, and meet all of the project objectives detailed in the DEIR, particularly balancing the needs of the overall region along with the complex site constraints and the competing needs and interests of the adjacent entities.

The Proposed Project at the Puente Hills Landfill will transform the closed Puente Hills Landfill into a "Park for All" which fills a critical need for parkland in the region, and offers diverse, healthy and active outdoor recreational experiences and programming for all. Outdoor recreational activities will include hiking, biking and equestrian multi-use trails, nature play, bike skills areas, fitness programs, dog park, zip lines, art installations and performances. Plantings will emphasize native vegetation including sweeping coastal sage scrub, wildflowers and grasslands. Picnic and open play areas will be ideal for family gatherings. Panoramic views will highlight the San Gabriel Mountains National Monument and regional landmarks.

The Proposed Project will also offer educational programs focusing on sustainable living, getting to zero waste, the natural and cultural history of the San Gabriel Valley, native wildlife and habitat, the history of the landfill and innovations to improve the environment. In addition, volunteer programs and a native plant nursery will offer visitors numerous ways to get involved with the park.

We participated in many of the workshops and outreach activities regarding the Proposed Project. The Proposed Project has incorporated and reflects the input we provided during the public participation process. Thank you for listening to us and giving us opportunities to be a part of this important planning effort to create the next regional park in Los Angeles County.

Sincerely,

  
Mark Stanley  
Executive Officer

MS:dw

100 N. Old San Gabriel Canyon Rd, Azusa, CA 91702 | 626.815.1019 | Fax: 626.815.1269 | [www.wca.ca.gov](http://www.wca.ca.gov)

**A15-1**

## **Responses to Letters A10 through A15**

### **Response to Comments A10-1 through A15-1:**

Thank you for your letter regarding the Puente Hills Landfill Park Master Plan Draft PEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. We look forward to your continued participation in the park planning process.

Some of the comment letters state that the Proposed Project would balance the needs of the overall region along with the complex site constraints and the competing needs and interests of the adjacent entities. The 25-mile service radius of the Proposed Project includes two of the fastest growing regions in the state: the Los Angeles metropolitan area and the Inland Empire. The park would be located in a park poor area, as stated in some of the comment letters. The new park would provide enhanced active and passive park and recreation opportunities for all users with an emphasis on public education, environmental stewardship, healthy living, and connections to nature. The Proposed Project has been planned for recreational activities that support a diverse population of all age groups equally from young children to seniors. The Proposed Project would provide the surrounding communities with a regional park destination created through a Master Plan process that blended several distinct park components and park objectives that emerged from the public/stakeholder participation process to shape the vision of the park.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter A16 - Governor's Office of Planning and Research  
State Clearing House and Planning Unit**



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA

Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

August 9, 2016

Julie Yom  
Los Angeles County Parks and Rec  
510 S. Vermont Avenue  
Los Angeles, CA 90020

PLANNING DIVISION  
AUG182016AM9:42

RECEIVED

Subject: Puente Hills Landfill Park Master Plan  
SCH#: 2015121051

Dear Julie Yom:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on August 8, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

**A16-1**

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures

cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044  
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

# PUENTE HILLS LANDFILL PARK MASTER PLAN FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

## Document Details Report State Clearinghouse Data Base

**SCH#** 2015121051  
**Project Title** Puente Hills Landfill Park Master Plan  
**Lead Agency** Los Angeles County Parks & Recreation

**Type** EIR Draft EIR  
**Description** The proposed project is a long range master plan that over time would develop a portion of what was formerly the largest landfill in the western US into a regional park, providing recreation and open space for the greater LA area. County of LA Department of Parks and Rec has the opportunity to create a new regional park uniquely situated at the western end of Puente Hills on a large industrial closed landfill site that is owned and maintained by the Sanitation Districts of LA County (Sanitation Districts).

### Lead Agency Contact

**Name** Julie Yom  
**Agency** Los Angeles County Parks and Rec  
**Phone** 213-351-5127 **Fax**  
**email**  
**Address** 510 S. Vermont Avenue  
**City** Los Angeles **State** CA **Zip** 90020

### Project Location

**County** Los Angeles  
**City** Industry  
**Region**  
**Lat / Long** 34° 1' 9.25" N / 118° 0' 34" W  
**Cross Streets** Crossroads Parkway South and State Route 60  
**Parcel No.** various  
**Township** **Range** **Section** **Base**

### Proximity to:

**Highways** SR-60  
**Airports**  
**Railways** UPRR  
**Waterways** San Gabriel River  
**Schools** various  
**Land Use** Closed Landfill / A-2-5 - Heavy Agricultural and A-1-5 - Light Agricultural, O-S Open Space/  
Public/Semi-Public

**Project Issues** Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

**Date Received** 06/23/2016 **Start of Review** 06/23/2016 **End of Review** 08/08/2016

Note: Blanks in data fields result from insufficient information provided by lead agency

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-9140  
FAX (213) 897-1337  
www.dot.ca.gov

*clear  
8/8/16  
E*



*Serious drought.  
Help save water!*

August 4, 2016

Governor's Office of Planning & Research

AUG 04 2016

**STATE CLEARINGHOUSE**

Ms. Julia Yom  
Department of Park and Recreation  
County of Los Angeles  
510 S. Vermont Avenue  
Los Angeles, CA 90020

RE: Puente Hills Landfill Park Master Plan  
Vic. LA-60/PM 12.619  
SCH # 2015121051  
Ref. IGR/CEQA No. 151246AL-NOP  
IGR/CEQA No. 160650AL-DEIR

Dear Ms. Yom:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Proposed Project is a long range master plan that over time would develop a portion of what was formerly the largest landfill in the western United States into a regional park, providing recreation and open space for the greater Los Angeles area.

The project would generate 2,340 average daily trips and 94/187 AM/PM peak hour trips. There are 9 projects within the project vicinity that may contribute cumulative traffic impacts on the State facilities. As a reminder, the decision makers should be aware of this issue and be prepared to mitigate cumulative traffic impacts in the future.

The Proposed Project would allow for performance and other special events during daylight hours. These would range in size and would likely be held primarily on holidays and weekend days when background traffic is lower and when opportunities to arrange for off-site parking are greater. For the larger events, which may draw 2,000 to 5,000 people, detailed traffic management plans will be prepared that identify potential off-site parking locations and ways to transport event-goers from there to the park. Caltrans would like to review the traffic management plans when it is available to ensure that temporary congestion will be minimized on the State facilities.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without a storm water management plan.

**A16-2**

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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Ms. Julia Yom  
August 4, 2016  
Page 2

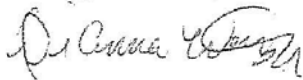
Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

In addition, a truck/traffic construction management plan may be needed for this project. Traffic Management Plans involving lane closures or street detours which will impact the circulation system affecting traffic to and from freeway on/off-ramps should be coordinated with Caltrans.

**A16-2  
Cont.**

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 160650AL-DEIR.

Sincerely,



DIANNA WATSON  
Branch Chief  
Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

**Responses to Letter A16 – Governor’s Office of Planning and Research –  
State Clearinghouse and Planning Unit**

**Response to Comment A16-1:**

This letter acknowledges that the State requirement for review of environmental documents has been satisfied. No response is necessary.

**Response to Comment A16-2:**

Please refer to the response to Letter A6 of this Final PEIR.

### **3.2 CATEGORY B: ORGANIZATION COMMENTS**

This section provides responses to the comment letters received from organizations. A master response is provided for Letters B7 through B12.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter B1 - Friends of the Whittier Hills**

**FRIENDS OF THE WHITTIER HILLS**

Box 247  
Whittier, California 90608

August 5, 2016

Julie Yom, Park Planner  
County of Los Angeles  
Department of Parks and Recreation  
Planning Division  
510 s. Vermont Avenue, Room 201  
Los Angeles, CA 90020  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)

The Friends of the Whittier Hills Association appreciates the opportunity to comment on the Draft Program Environmental Impact Report Plan dated June 24, 2016.

The Friends of Whittier Hills Association founded 37 years ago after the successful *Save Our Hills* referendum and *Save Our Hills Again* initiative drives which resulted in Proposition A where the voters of Los Angeles County approved an increased in taxes to fund the purchase of land to begin the creation of the Puente Hills Wildlife Corridor and other similar projects. The Friends of the Whittier Hills is an educational organization dedicated to the preservation of the hills and its wildlife. We advocate the responsible recreational use that promotes a sustainable habitat and the continued expansion of the Puente-Chino Hills Wildlife Corridor.

When stakeholders were give a choice they “clearly chose the Ecology option” (2.5) which implies by definition the interaction between plants and animals within their natural environment. Yet, areas of the Proposed Project site are adjacent to Significant Ecological Areas that are “irreplaceable biological resources” (DPEIR fig. 3.4-1). The corridor that connect these two zones including Nike Hill and the land between it and the Western, Eastern and Southern Decks are areas of intense environmental alteration and disruptive use in Proposed Park Plan. Proposed uses are the gondola path, zip lines, slide, switch back trail for ADA, observation decks, restrooms and food facilities. This corridor is the nesting ground and habitat for the endangered California Gnatcatcher (DPEIR fig. 3.4-1). Clearly this corridor should be identified as a Significant Ecological Area. As many of these attractions as possible should be deferred to the latter phases of the Proposed Park Plan so they can be move to the Northern side of the decks or adopt the Low Build Alternative.

The passing of Proposition A and the current Ecology choice illustrates that the residents of Los Angeles County want open natural spaces within the urban conglomeration of Los Angeles County. When the preliminary stakeholder meetings were held they did not have knowledge of the severe limitations of the site or the ecological consequences of their brainstormed ideas for the Proposed Park Plan. Give the current parameters of the Proposed Park Plan the Friends of Whittier Hills highly recommend the Low Build Alternative.

Sincerely,

James B. Kelly Jr.  
President of the Friends of the Whittier Hills  
[jb123kelly@earthlink.net](mailto:jb123kelly@earthlink.net)

## **Responses to Letter B1 – Friends of the Whittier Hills**

### **Response to Comment B1-1:**

The commenter notes that an additional Significant Ecological Area should be designated between the Western, Eastern, and Southern decks as it provides a wildlife corridor including the coastal California gnatcatcher. Please refer to Response to Comments A8-1 through A8-5. Mitigation Measures B-6 and B-8 have been amended in Section 4, Errata, of this Final PEIR to address the loss of coastal sage scrub and effects on gnatcatcher and wildlife movement through the project area.

The commenter prefers the Low Build Alternative. Coordination between multiple agencies, policy makers, experts, communities, and local and regional stakeholders was conducted as part of the park master plan process. Creation of the initial vision for the park was reliant on the early outreach efforts to these groups. Over a six-month period in late 2015 and early 2016, the County sought and documented the public's needs and interests through community meetings and other means in order to shape the initial park vision. Six distinct park components emerged from this process that helped form the project objectives.

Alternative plan development sought diverse opinions to form three multi-layered, community driven designs. The main themes that emerged from the site analysis and the community/stakeholder visioning process were combined into three alternative park development concepts: Ecology, Recreate, and Upcycle. Results of public voting selected Ecology as the main theme as stated in the comment. However, family recreation and fitness dominated the selection of recreational elements that were chosen for the new park. The final park concept (Proposed Project) is an adaptation of the original Ecology concept, but retains aspects of the other themes as each design proposes unique solutions that can be transferred over to the Ecology theme.

The master plan process helped inform the alternatives selection process in the EIR by providing three concept plans that were vetted with the community and DPR. As described above, the Proposed Project is the Ecology theme with selected elements from the Recreation and Upcycle themes. In response to comments received during the EIR scoping period, the more passive Ecology and higher use Recreate alternatives were further defined and carried forward for analysis as the Low Build Alternative and the High Build Alternative.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter B2 - Hacienda Heights Improvement Association**



HACIENDA HEIGHTS IMPROVEMENT ASSOCIATION, INC.  
POST OFFICE BOX 5235 • HACIENDA HEIGHTS, CA 91745

Julie Yom, Park Planner  
County of Los Angeles  
Department of Parks and Recreation  
Planning Division  
510 S. Vermont Avenue, Room 201  
Los Angeles, CA 90020  
  
jyom@parks.lacounty.gov

August 7<sup>th</sup>, 2016

**Comments on the Draft Program Environmental Impact Report for the Puente Hills Landfill  
Park Master Plan Project dated June 2016. State Clearinghouse Number 2015121051**

Dear Ms. Yom:

The Hacienda Heights Improvement Association (HHIA) appreciates the opportunity to comment on the Draft Program Environmental Impact Report (DPEIR) for the Puente Hills Landfill Park Master Plan dated June 24, 2016.

The forerunner organization to HHIA was the North Whittier Heights Improvement Association (NWHIA) which was established in 1948 and incorporated in 1955. Following the naming of the growing community, a Los Angeles County unincorporated community, to Hacienda Heights in 1965, the organization was renamed the Hacienda Heights Improvement Association. HHIA is an IRS 501(c) (4) nonprofit community organization devoted to preserving the community's traditions and representing it before local legislature and administrative organizations. HHIA works closely with the Los Angeles County agencies in such areas as zoning, traffic, parking and those aspects of activities which affect the community residents and their quality of life.

We appreciate the opportunity to comment on the Puente Hills Landfill Park Master Plan and look forward to a continued partnership with its development. We understand that the Project site is 600

HHIA Comments to PDEIR PHLF Park

7 August 2016

website: [www.hhia.net](http://www.hhia.net)

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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acres of fill and includes development of 117 acres of fill and another 15 acres of non-fill plus the utilization of the 10-acre buttress site (142 acres total).

**Project Description:** The project features include an Entry Plaza, Maintenance & Operations Area, Buttress, Nike Hills, Western Deck, Eastern Deck, Southern Deck, the Flare Site and parking for 200 cars. Phases I and II of the Project involve development within the first 20 years, and Phases III through VI pertain to development within years 21 through 75. No further California Environmental Quality Act document is reported to be expected for Phases I and II beyond the DPEIR. Years 1 to 5 include but are not limited to the following: an Entry Plaza, 4-mile loop access road, 100 parking spots, 8,600 square foot Visitor Center, 1,650 square foot Maintenance Office, 6,000 square foot Nike Hill Plaza and Scenic Overlook, public bathrooms, development of 13 acres of the Western Deck (including performance area and 5-acre bike skills area), less than 4.25 miles of loop trails, bike rental, coffee cart at Scenic Overlook, and landscaping. Years 6 to 20 include but are not limited to: decorative fencing and gating at entry, design and install trail lift (gondola) including 1,000 square foot trail lift (gondola) structure at Entry Plaza, design and install 2,000 square foot trail lift (gondola) structure at the Nike Hill to include a café, restroom and staff office, expand top deck trails, provide equestrian staging on Southern Deck, expand signage and education components, mini café at (trail lift and) Visitor Center, and landscaping.

HHIA is concerned regarding the impact that the Project could have on biological resources, noise, recreation, public services, aesthetics, and land use, of the Puente Hills Landfill proposed park. We recommend that the Low Build Alternative (with minor adjustments) be selected as the preferred Project. The Low Build Alternative will have far less impacts and will be compatible with surrounding property uses.

As mentioned in our past Comments on the Scoping Meeting and Preferred Plan dated January 31<sup>st</sup>, 2016, we continue to be concerned about three major areas of interest: Access, Safety and Integration with existing facilities and trails. Environmental Issues continue to dominate conversations with our residents. Attached are further detailed comments.

According to information that I have seen, there is no intention to provide access to the proposed park from the east, but the opportunity exists for visitors to the trails from the east will see them as a pleasant or challenging approach to the proposed park.

**B2-1**

The Schabarum trail AKA Juan Bautista de Anza NHTRR crosses through the proposed park area and continues until it crosses Turnbull Canyon Road near at the crest of the road. There are 2 ways to accomplish this. A trail dips into the canyon southeast of Coyote Trail and ascends to the road where it crosses and continues on. There is roadside parking for 1 or 2 cars there. A spur of the trail also continues straight a short distance where it ends at a residential area at the northern end of Skyline drive. There is parking for very few vehicles at that point. This provides access to the proposed park from the south east. This access is quite easy because it begins at a high elevation and transverses the ridge of the Puente hills for about 1 mile to the area of the proposed park. This would be an easy walk with scenic views to the east and west. This access is already popular and our residents comment that this is a great place to view sunsets.

HHIA Comments to PDEIR PHLF Park

2  
7 August 2016

website: [www.hhia.net](http://www.hhia.net)

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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Another alternative would be to link the trails starting at the 7th Ave trailhead with the two closed gates at Los Robles Avenue and Orange Grove Avenue to provide alternate access routes to the eastern side proposed park by hikers wanting to walk into the park. These trails have been used for years to reach the area of the proposed park. Parking is already an issue in this area even though these trails are used now by serious hikers.

**B2-1  
Cont.**

Thank you for your consideration and please do not hesitate to contact me at (626) 536-3407 or email: mikewilliamsinhh@roadrunner.com for any discussion.

Sincerely,



Michael J. Williams, Vice President

Chair, HHIA Task Force on Puente Hills Landfill Park Planning

cc: HHIA Board of Directors  
Supervisor 4<sup>th</sup> District Los Angeles County  
Supervisor 1<sup>st</sup> District Los Angeles County

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**General Comments on the Draft Program Environmental Impact Report for the Puente Hills Landfill Park Master Plan Project dated June 2016. State Clearinghouse Number 2015121051**

HHIA has been fortunate to receive a copy of the Comments by the Puente Hills Native Habitat Preservation Authority dated 28 July 2016 on the above referenced document.

**B2-2**

HHIA strongly supports the comments and recommendations made by the Puente Hills Native Habitat Preservation Authority. Their wildlife, environmental and habitat expertise can be used to insure the Puente Hills Landfill Park serves the best interests of surrounding community residents, quality of life criteria and an asset for generations to come.

**Specific Comments on the Draft Program Environmental Impact Report for the Puente Hills Landfill Park Master Plan Project dated June 2016. State Clearinghouse Number 2015121051**

**EXECUTIVE SUMMARY**

**ES.3 PROJECT BACKGROUND**

In paragraph 3 of the Project Background, extensive reference is made to a JPA with no date indicated. In the Puente Hills Landfill Joint Powers Agreement dated 28 April 1987, Article I, Section B County's Responsibilities, item 4) "Should County decide to accept designated open space areas, the Department Head of the County Parks and Recreation, in conjunction with the District's Chief Engineer and General Manager, will appoint a Citizen's Advisory Committee to assist in the planning and development of alternative uses for the open space park." To date we can find no reference nor documentation of such a committee in any of the Park Planning documents. If said committee exists, we would appreciate knowledge of who the committee members are, when their meetings were held and any meeting minutes that exist.

**B2-3**

**ES.4.1 Park Areas**

**ES.4.1.1 Entry Plaza**

The PDEIR continues to describe a single entry and single exit point. The following recommendations were made in the 31 January 2016 letter referenced above, we continue to recommend:

- Access continues to be the prime concern of our organization and residents of Hacienda Heights. Only the singular access from Crossroads Parkway is identified and described. Reference is made to potential future access through Rose Hills Memorial Park, which would even be further away than the access at Crossroads Parkway Entrance for residents of Hacienda Heights.

**B2-4**

HHIA Comments to PDEIR PHLF Park

7 August 2016

website: [www.hhia.net](http://www.hhia.net)

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- No mention of potential access from Turnbull Canyon Road, Hacienda Heights Trailhead, Orange Grove Park or Los Robles Avenue for hikers and bikers who would prefer enter the park through the hills is provided or discussed. Lack of access from surrounding areas, particularly Hacienda Heights, will preclude easy use by many residents who have borne the major impacts of the operating landfill. Recent gate closures and limited parking areas at local trailheads have caused severe parking problems at remaining available sites. Thus multiple park access points should be investigated with provision for parking. Possible access exists at Turnbull Canyon and Skyline Drive. The Skyline trail runs directly along the top of the Landfill; a trailhead could be established nearby with equestrian amenities that include parking for trailers and hitching rails for horses.

**B2-4  
Cont.**

- We believe there should be a parking area and equestrian facility in the region currently designated as the upper terminal for the gondola that would serve as trailhead access to the Skyline Trail. This site should include the equestrian amenities above with space for horse trailers, water for horses, hitching rails etc. In addition, the Rio Hondo road to the former Nike site could be improved. Some connection from the new park to the Sycamore Canyon Trail should be investigated.

**ES.6.1 Low Build Alternative**

HHIA continues to support the Low Build Alternative as the best alternative for Hacienda Heights resident's quality of life.

**B2-5**

**Table ES-6. Impact and Mitigation Summary Table, Page ES-46**

**Fire Risk.** The project site is located within a Very High Fire Hazard Severity Zone as shown in the County's General Plan. There would be an incremental increase in exposure of people and structures to fire risk due to the development of the site and increased human presence from park users. New construction within Very High Fire Hazard Severity Zones are required to use ignition resistant materials as described in the CBC and to follow the County's Fuel Modification Plan Guidelines. Compliance with these regulations and requirements would improve the site's defensible space, reduce the likelihood of the loss of structures to fire, and would reduce the risk of injury or death from fire. Impacts would be less than significant.

**B2-6**

**No mitigation required.**

**Less than significant.**

In this year, 2016, the type, location and duration of fires in California has been devastating, yet the supporting Fire Department will be limited to a single entrance/exit with Sanitation, Rose Hills and Visitor traffic.

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**SECTION 1.0 INTRODUCTION**

**Table 1-1. Anticipated Agency Approvals and Reviews**

There is no mention of the Los Angeles County Sheriff's Department and the Los Angeles County Fire Department. In addition, there is no mention of the only adjoining city, Whittier, and its Police and Fire Departments.

**B2-7**

**1.4 DOCUMENTS INCORPORATED BY REFERENCE**

There is no reference to the JPA referenced in E.3 Project Background above.

**B2-8**

## **Responses to Letter B2 – Hacienda Heights Improvement Association**

### **Response to Comment B2-1:**

This comment states that the HHIA recommends the Low Build Alternative and is concerned about project impacts on biological resources, noise, recreation, public services, aesthetics, and land use.

The Proposed Project would be accessible from the Schabarum-Skyline Trail which is located along the southern edge of the proposed park. The Turnbull Canyon Trail, Skyline Trail, Puma Trail, Ahwingna Trail, and other local trails could be used the access the Schabarum-Skyline Trail and gain access to the park. The County Department of Parks and Recreation (DPR) will continue to review access from the 7<sup>th</sup> Avenue Trailhead and Orange Grove Avenue.

### **Response to B2-2:**

Thank you for your comment. Please refer to the comment responses for Letter A2, Puente Hills Habitat Preservation Authority.

### **Response to Comment B2-3:**

The referenced JPA in the 3<sup>rd</sup> paragraph of the Project Background section on page ES-2 of the Draft PEIR is dated April 28, 1987.

The planning process for the Puente Hills Landfill Park Master Plan and EIR included input from a Technical Advisory Committee (TAC) comprised of multiple agencies, organizations, and local/regional stakeholders. The TAC has met five times on the following dates: 8/20/15, 9/24/15, 10/29/15, 1/21/16, and 6/23/16. Minutes are not available; however, DPR can provide the summary for each community workshop upon request.

The following agencies and organizations participated in the TAC:

1. Los Angeles County Civic Arts Commission
2. Los Angeles County Department of Parks & Recreation, Planning & Development Agency
3. Los Angeles County Department of Regional Planning
4. Los Angeles County Department of Public Works
5. Los Angeles County Fire Department
6. Los Angeles County Sanitation Districts
7. Rio Hondo College
8. Rose Hills Memorial Park
9. Puente Hills Habitat Preservation Authority
10. Southern California Edison
11. Regional Water Quality Control Board, Los Angeles Region

It should also be noted that 18 stakeholder interviews were also conducted with the following:

1. SD-1 Board Office Staff
2. SD-4 Board Office Staff

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3. Los Angeles County Sanitation Districts
4. Puente Hills Habitat preservation Authority
5. Rose Hills Memorial Park
6. Rio Hondo College
7. Hacienda Heights Improvement Association
8. Workman Mill Homeowner's Association
9. City of El Monte
10. City of Whittier
11. City of Industry
12. City of South El Monte
13. City of La Puente
14. Rivers and Mountains Conservancy/Watershed Conservation Authority
15. Equestrian Joint Council
16. Concerned Off-Road Bicyclist Association
17. Sierra Club
18. San Gabriel Mountains Forever

**Response to B2-4:**

This comment is concerned with the single point of entry and exit at Crossroads Parkway. The entry would be configured with either a roundabout (traffic circle) or traffic signal to control the movement of traffic. The proposed Rose Hills Memorial Park access road through the park to their property would only be used by Rose Hills. No access to the park would occur from Rose Hills. Please refer to Response B2-1 above regarding trail access. The HHIA's scoping comment letter dated January 31, 2016 was taken into consideration as part of the master planning and PEIR process.

**Response to Comment B2-5:**

This comment expresses support for the Low Build Alternative. Comment noted.

**Response to B2-6:**

This comment references the fire risk discussion in the Executive Summary of the Draft PEIR. A detailed discussion of fire risk and safety can be found in Section 3.8, Hazards and Hazardous Materials, pages 3.8-14 and 3.8-15. In addition, Section 3.12.4.1, Fire and Sheriff Protection of the Draft PEIR, includes an analysis of project impacts on the Los Angeles County Fire Department (LACFD). Mitigation Measure PS-1, requiring a Fire Incident Plan, would reduce impacts to a less than significant level. Figure 3.14-7 of the Draft PEIR shows five main evacuation and emergency access points that could be used by the LACFD. The impact discussion on pages 3.14-53 and 3.14-57 describe the emergency access points and plans.

**Response to Comment B2-7:**

Review by the Los Angeles County Sheriff's Department (LASD) and the Los Angeles County Fire Department (LACFD) will be added to Table 1-1 of the Draft EIR. Please refer to Section 4, Errata, of this Final EIR. The Proposed Project is under the jurisdiction of the LASD and LACFD.

**Response to B2-8:**

The Joint Powers Agreement will be added to Section 1.4, Documents Incorporated by Reference, of the Draft PEIR. Please refer to Section 4, Errata, of this Final EIR.

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**Letter B3 - Hills for Everyone**

H I L L S   F O R   E V E R Y O N E

*Southern California comes  
together at the Puente - Chino Hills*



Los Angeles County  
Orange County  
Riverside County  
San Bernardino County

August 8, 2016

Julia Yom, Park Planner  
County of Los Angeles  
Department of Parks and Recreation  
Planning Division  
510 S. Vermont Avenue, Room 201  
Los Angeles, CA 90020  
jyom@park.lacounty.gov

**Re: Draft Program Environmental Impact Report for the Puente Hills Landfill Park  
Master Plan Project, June 2016. State Clearinghouse Number 2015121051**

Dear Ms. Yom:

Hills For Everyone (HFE) appreciates the opportunity to comment on the Draft EIR for the Puente Hills Landfill Park Master Plan Project. HFE is a non-profit organization that strives to protect, preserve, and restore the environmental resources and natural environs of the Puente-Chino Hills and surrounding areas for the enjoyment of current and succeeding Generations.

HFE is disappointed to see the excessive development of the former landfill property because of the impacts that the Project may well have on biological resources of the Puente Hills Preserve and the cascading impacts on the entire Puente Chino Hills Wildlife Corridor. We endorse the Low Build Alternative as the preferred Project.

**B3-1**

Sincerely,

*Claire W. Schlatterbeck*

Claire W. Schlatterbeck  
Executive Director  
Hills For Everyone

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Hills for Everyone • P.O. Box 9835 • Brea, CA 92822-1835 • [www.hillsforeveryone.org](http://www.hillsforeveryone.org)

## **Responses to Letter B3 – Hills for Everyone**

### **Response to Comment B3-1:**

This comment is concerned with biological resources impacts of the Proposed Project on the Puente Hills Preserve and potential impacts on the Puente Chino Hills Wildlife Corridor. Impacts to biological resources are discussed in Section 3.4 of the Draft PEIR. Cumulative biological impacts are discussed in Section 5.1.4.3 on page 5-4 of the Draft PEIR.

The commenter endorses the Low Build Alternative. Comment noted.

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**Letter B4 - Rose Hills Memorial Park**



Susan K. Hori  
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August 8, 2016

**VIA E-MAIL: *JYOM@PARKS.LACOUNTY.GOV***

Julie Yom, Park Planner  
County of Los Angeles  
Department of Parks and Recreation  
510 S. Vermont Avenue, Room 201  
Los Angeles, CA 90020

**Re: Puente Hills Landfill Park Master Plan Environmental Impact Report**

Dear Ms. Yom:

This letter provides Rose Hills' comments on the Puente Hills Landfill Park Master Plan Draft Program Environmental Impact Report ("DEIR"). Rose Hills Memorial Park & Mortuary ("Rose Hills"), located at 3888 Workman Mill Road in Whittier, has been in existence since 1914. Rose Hills is the largest memorial park in North America, with two full-service mortuaries, landscaped grounds, and chapels. It is located immediately adjacent to the proposed location of the Puente Hills Landfill Park ("Project").

The proposed Project site is the location of the now closed Puente Hills Landfill which is owned by the Sanitation Districts of Los Angeles County (the "District"). Rose Hills has been a good neighbor to the landfill, and has worked cooperatively with the District to address their mutual operational issues and concerns when the landfill was in operation and now as the District conducts its long-term closure and maintenance activities. To the extent issues have arisen, the two entities have worked amicably together to reach a reasonable resolution to ensure both uses could prosper. It is Rose Hills' desire and intent that this positive relationship continue with the County of Los Angeles Department of Parks and Recreation ("County Parks"), as the landfill transitions from its historic uses to its future use as a public, regional park. However, as a business dependent upon tranquility and serenity for its users, Rose Hills has important concerns about the significant environmental impacts the proposed Puente Hills Landfill Park will have on its operations and the lack of analysis of Rose Hills' status as an adjacent "sensitive receptor" with respect to future park operations in the DEIR.

Rose Hills currently has approximately 3 million visitors per year who will be affected by the proposed project. On behalf of itself and its visitors, Rose Hills is particularly concerned with aesthetic, noise, and traffic impacts that could result from the intensive uses proposed at the

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park, as well as the imposition of mitigation measures and limitation on future use of the Rose Hills' access road.

Consistent with these comments, Rose Hills supports selection of the Low Build Alternative which is environmentally superior to the proposed project, would minimize the significant impacts to Rose Hills caused by the proposed project, provide greater compatibility with Rose Hills' continuing operations, and meet the project objectives.

**I. The DEIR's Analysis of Aesthetic Impacts Significantly Underestimates Impacts on Rose Hills.**

Rose Hills is located immediately adjacent to the project site, with more than 5,000 feet of shared boundary between the site and Rose Hills. The DEIR identifies Rose Hills as a sensitive receptor for purposes of aesthetic impacts because Rose Hills' visitors are considered to have a high visual sensitivity. (DEIR at 3.2-9.) Despite the recognition of Rose Hills as a sensitive receptor, the DEIR's aesthetics impacts analysis severely underestimates the aesthetic impacts of the project to Rose Hills and provides little, if any, support for its visual impacts analysis as it pertains to Rose Hills.

a. The DEIR Does Not Adequately Analyze the Project's Impacts to Scenic Vistas From Rose Hills.

CEQA requires consideration whether a proposed project would have a substantial adverse effect on a scenic vista. The DEIR defines a scenic vista as a publicly accessible "viewpoint that provides expansive views of a highly valued landscape...." (DEIR at 3.2-14.) A substantial adverse impact to a scenic vista is one that degrades the view from a public viewpoint. (*Id.*) Although Rose Hills is a privately-owned memorial park, it is open to the public and provides numerous public viewpoints that provide expansive views of the San Gabriel Mountains, San Gabriel Valley and the Los Angeles Basin that are of significant value to its visitors when visiting the park and their loved ones. For this reason, the DEIR identified Rose Hills as a sensitive receptor with high visual sensitivity.

The DEIR fails to provide any meaningful analysis of the project's impacts to the scenic vistas as viewed from Rose Hills. This is due, in part, to the DEIR's misplaced assumption that the only scenic vistas that must be examined are those from the proposed Project site, and that development of any kind on the former landfill area must be beneficial. (See analysis on page 3.2-14 which concludes that the project does not affect scenic vistas because all development would occur within the closed landfill and would "allow the public to enjoy scenic vistas of the surrounding valley, hills, and mountains.") Neither assumption is accurate. To the contrary, the DEIR must consider whether the project impacts a scenic vista. Scenic vistas are not limited to

**B4-1**

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just view from the project site, but can and in this instance must include scenic vistas from other public viewpoints, such as Rose Hills and the public Schabarum-Skyline Trail, to which the project will intrude. In addition, the DEIR must not simply assume that development always provides a beneficial impact.

Although the DEIR acknowledges that there are scenic vistas from area trails and Rose Hills, it fails to provide a comparison of the existing conditions against developed conditions so that the public can see how these vistas will be altered. The DEIR mistakenly assumes that because the top decks of the landfill are devoid of vegetation and structures, that development of the area with structures would enhance the visual condition and provide a beneficial impact. (DEIR at 3.2-14.) This is not the case. Views of the Project site, such as the Western Deck, will be significantly altered by the placement of new structures, as well as the introduction of people, lights and increased activity. More importantly, the DEIR fails to include any pictures and/or renderings depicting the impact the project would have from the public viewpoints at Rose Hills. For example, the DEIR at Figure 3.2-13 provides an “artist rendering” of the trail lift at Nike Hill from the Project site. The DEIR should have included a picture – not an “artist rendering” of the existing views Rose Hills currently has of the Nike Hill area and compare the existing views to a visual simulation of that same view with all of the development proposed by the project, including the trail lift and zip lines. Had this comparison been provided it would have demonstrated the significant adverse effect the proposed Project would have on scenic vistas. In order to mitigate the significant impacts of these Project components on this scenic vista, Rose Hills recommends that the County adopt the Low Build Alternative which would provide uses much more compatible to Rose Hills’ operation in this area and reduce the significant impact on the scenic vistas to less than significant.

**B4-1  
cont.**

This omission is fatal under the California Environmental Quality Act (“CEQA”), which requires that factual conclusions be supported by substantial evidence. (*Friends of Oroville et al. v. City of Oroville* (2013) 219 Cal.App.4th 832, 836.) Under CEQA, substantial evidence includes facts, reasonable assumptions predicated on facts, and expert opinion supported by facts. (CEQA Guidelines § 15384(b).)

The DEIR’s failure to include meaningful, evidence-based analysis is made even more egregious by the express recognition of Rose Hills as a sensitive receptor for aesthetics impacts purposes. (DEIR at 3.2-9 [Rose Hills visitors have a high “visual sensitivity.”]) Rose Hills has significant views of the San Gabriel Mountains from various locations on the property, including the Buddhist Memorial Columbarium. The proposed Project has the potential to significantly impact these scenic vistas, as it proposes numerous tall, bulky structures that would obscure or obstruct these scenic vistas. As discussed above, the DEIR must specifically identify scenic vistas from Rose Hills, as well as area trails, and conduct specific analysis of the potential of the proposed project to impact such vistas. (*City of Long Beach v. Los Angeles Unified School*

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*District* (2009) 176 Cal.App.4th 889, 902 [EIR must include a detailed discussion that shows the analytic route the agency traveled from evidence to action].) Here, the DEIR simply has not conducted this analysis of this significant impact or provided the evidence to support its conclusions that the project beneficially impacts scenic vistas.

The DEIR makes an ill-fated attempt at supporting its conclusion that the Project does not create significant impacts to scenic vistas by asserting that there would be no significant impacts to scenic vistas because (1) all development would occur within the closed landfill and (2) the top decks of the landfill are primarily devoid of vegetation. (DEIR at 3.2-14.) However, there is no factual basis to support these conclusions. Moreover, even if all development occurred within the landfill, the construction of the proposed improvements (including a lookout, zip line, and trail lift) would undoubtedly alter the existing views of the San Gabriel Mountains from both area trails and Rose Hills. The DEIR concludes these views would be benefitted by the project, but without any factual support.

**B4-1  
cont.**

With respect to Rose Hills specifically, the DEIR concludes that the project would have a positive impact because the existing barren landfill site would be improved with landscaping and recreational facilities. (DEIR at 3.2-14.) First, this conclusion does not address the threshold, which defines scenic vistas as “views of a highly valued landscape for the benefit of the general public” which views from Rose Hills would clearly be. (*Id.*) The threshold is not project site specific, but requires analysis of impacts to scenic views of other landscapes, particularly the San Gabriel Mountains. Moreover, the DEIR’s assertion regarding the beneficial impacts to the improvements to the existing environment are unsupported. Here, the project would introduce significant infrastructure, including a zip line, trail lift towers, trail lift (which is mobile), and a scenic overlook, that will dramatically change the existing landscape and obstruct existing views from Rose Hills. (*Ocean View Estates Homeowner’s Ass’n, Inc. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 400-402 [a substantial negative effect of a project on a view can be a significant impact, and personal observations on these issues may constitute substantial evidence].) These scenic vista impacts are significant and must be analyzed under CEQA.

b. The DEIR’s Analysis of the Project’s Potential to Degrade the Existing Visual Character of the Surrounding Environment is Inadequate.

As discussed above, the Project would introduce extensive, tall and mobile infrastructure to the Project site. These improvements would significantly degrade the existing visual character of the surrounding environment in a manner which will significantly impact Rose Hills. CEQA requires that these impacts be thoroughly analyzed.

**B4-2**

The DEIR purports to analyze the potential of the project to degrade the existing visual character of the surrounding environment, including Rose Hills, but fails to do so consistent with

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the requirements of CEQA. For example, instead of providing “before and after” photographs depicting the change in the existing visual character of the area around the Project, the DEIR simply concludes the project would not significantly degrade the existing visual character because (1) the project would positively change the existing barren character of the site and (2) views of Nike Hill from nearby sensitive receptors, including Rose Hills, are “already dominated” by manmade structures. (DEIR at 3.2-17.) These assertions are not supported by evidence, and are, at best, internally inconsistent.

First, the DEIR summarily concludes that views of Nike Hill are already *dominated* by manmade structures that visually contrast with the surrounding natural areas. However, views of Nike Hill are not the only views that are required to be considered. The Buttress and the South Deck, for instance, are also visible from Rose Hills and are proposed for development that would change the existing environment. Moreover, although the DEIR asserts that views of Nike Hill are *dominated* by manmade structures, there are no renderings or images that allow readers to assess the reliability of this statement. Quite simply, it is a statement without adequate supporting evidence and for which there is substantial contradictory evidence. While views of Nike Hill from nearby receptors include manmade structures, such views are still primarily comprised of vegetation and open space.<sup>1</sup> The manmade structures hardly dominate the landscape. The DEIR itself notes that the top decks of the landfill are mostly devoid of structures, and that there are natural spaces present within the landfill. (DEIR at 3.2-17.) Moreover, the structures that are present are immobile infrastructure, such as water tanks. In terms of aesthetic disruption or the viewshed, an immobile water tank is quite different from two zip lines and a trail lift which will result in visual disruption and movement as well as considerable human noise and presence. These differences and their impacts to the visual character of the site were not addressed in the DEIR. The DEIR’s conclusions are based largely on the unsupported assertion that the proposed project would introduce structures on property that is already dominated by structures; however, as discussed above, this conclusion is not only fundamentally wrong, it is not supported by any evidence or analysis of how existing conditions would be affected by the proposed project. In reality, the Project would introduce significant structural improvements that would significantly alter and degrade the existing visual character or quality of the site and must be analyzed under CEQA.

Finally, the DEIR’s conclusions also appear to be based upon the mis-characterization of the existing landfill as a less-than-desirable visual resource, which allows the DEIR to conclude that the proposed project would be beneficial. This characterization is inappropriate, and the barren nature of the top decks of the site is not sufficient justification to conclude that the

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<sup>1</sup> The Puente Hills Landfill Joint Powers Agreement specifically states that the District desires to “designate as *open space* those portions of the site on which fill has been or will be placed in accordance with Condition 21, hereinafter referred to as *designated open space areas*...” *Puente Hills Landfill Joint Powers Agreement* at 1.

**B4-2  
cont.**

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significant development proposed by the project would be an improvement. The majority of the project site is unobstructed open space and largely undeveloped, including those areas that are devoid of vegetation. Thus, it is against this baseline that the DEIR must analyze the project. (*City of Long Beach v. Los Angeles Unified School District* (2009) 176 Cal.App.4th 889, 902 [EIR must include sufficient information showing the analytic route the agency traveled from evidence to action].)

**B4-2  
cont.**

**II. The DEIR Fails to Identify Rose Hills as a Sensitive Noise Receptor.**

Rose Hills is concerned with the amount of noise that will be generated by the proposed project improvements, and the adverse impacts those new noise sources will have on guests and visitors to Rose Hills. As discussed above, Rose Hills is a place intended for preservation, memorial, and thoughtful reflection on the lives and legacies of our past loved ones. To properly fulfill this purpose, Rose Hills must be maintained as a place of serenity, without the interruption of invasive, disruptive noises. Because of the nature of its operations, Rose Hills should have been identified as a sensitive noise receptor in the DEIR, and the DEIR's noise analysis should have been analyzed with respect to its impacts on Rose Hills, a sensitive receptor.

The DEIR's failure to identify Rose Hills as a sensitive receptor, and the resulting failure to analyze noise impacts to Rose Hills, violates the fundamental purpose of CEQA to fully disclose and analyze the potential significant impacts of a project. The failure of the DEIR to exclude Rose Hills as a sensitive receptor is inconsistent with its adopted definition of sensitive receptor – "those land uses that *require serenity* or are otherwise adversely affected by noise...." (DEIR at 3.11-5.) This definition of sensitive receptor is not rigid, but mandates identification of any receptor that requires a serene environment or could be impacted by noise.<sup>2</sup> Rose Hills should be considered a sensitive receptor under this definition because it includes various chapels, memorials, burial sites, and family gathering areas. The very nature of its uses require a serene, quiet environment.<sup>3</sup> Moreover, Rose Hills' location immediately adjacent to the most intensive area of development (Nike Hill and amphitheater) makes analysis of potential impacts especially important. (*Association of Irrigated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1390 [EIRs must include analysis sufficient to enable those who did not participate in its preparation to understand and consider meaningfully the issues raised by the project].)

**B4-3**

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<sup>2</sup> The EIR then includes a list of example sensitive receptors, including schools, libraries, *churches*, hospitals, residential uses, and lodging uses. EIR at 3.11-5. Rose Hills has numerous chapels on its grounds.

<sup>3</sup> The DEIR does not provide any explanation as to why Rose Hills was not considered a sensitive receptor under this definition. The lack of an explanation is particularly glaring given that the DEIR considered Rose Hills to be a sensitive receptor for purposes of aesthetics.



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The DEIR's exclusion of Rose Hills as a sensitive receptor fundamentally undermines the entire noise analysis. For example, the DEIR notes that a likely worst-case construction scenario assumes the use of a grader, a dozer, two excavators, two backhoes, and a scraper operating at **300 feet** from the nearest sensitive receptor. (DEIR at 3.11-18.) However, as discussed above, Rose Hills would be closer to the bulk of project site development, and almost assuredly closer than 300 feet.

**B4-3  
cont.**

In addition to the construction impacts, the project's operational impacts must also be considered. The noise from people on the trial lift, the zip lines, and attending performances at the amphitheater as well as the noise from the performances themselves must all be considered, measured and their impacts assessed in terms of it will affect Rose Hills in order to satisfy the requirements of CEQA.

### **III. The DEIR's Traffic Analysis Does Not Adequately Analyze Impacts to Rose Hills.**

The proposed project would increase traffic in the vicinity, including on various roads utilized by Rose Hills' families and visitors (such as Workman Mills Road). This increase has the potential to have a significant negative impact on Rose Hills' operations, including with respect to visitors and funeral processions. Rose Hills has a vested interest in ensuring all potential traffic impacts of the proposed project are appropriately analyzed, identified, and mitigated as required by CEQA.

#### **a. The EIR's Traffic Generation Assumptions Are Flawed**

The DEIR's trip generation analysis appears to be fundamentally flawed. The DEIR notes, for example, that the project is expected to generate approximately (1) 94 trips during the weekday morning peak hour, (2) 187 trips during the afternoon peak hour, and (3) 2,340 trips on a typical weekday. (DEIR at 3.14-13.) However, the assumptions used to generate these figures are flawed and unreasonable. First, the trip generation figures are all based on weekday numbers. As a regional park, and in light of the types of amenities that are being contemplated, we believe that the park would attract significantly more trips than 2,340 trips on weekends (Saturday and Sunday) and trip assumptions for the number of park visitors on weekends should be calculated. Second, with respect to operation of the amphitheater and other potential events, and thus the analysis of traffic impacts is not supported by substantial evidence. (Pub. Res. Code § 21080(e)(1) [substantial evidence includes reasonable assumptions predicated on facts].) The DEIR's trip generation figures assume that performance and other special events (1) would occur during daylight hours only and (2) would "*likely*" be held primarily on holidays and weekends when background traffic is lower. It is unclear what "performance and other special events" means in the context of trip generation. The DEIR states that special events are estimated to

**B4-4**

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involve up to 5,000 attendees, in addition to general park attendance.<sup>4</sup> (DEIR at 3.14-13.) However, specifically with respect to events occurring at the amphitheater, the DEIR states that such concerts are anticipated to have attendance of approximately 2,000 people. (DEIR at 3.11-24 [(“which includes typical live concert events at the amphitheater with approximately 2,000 people”)].) Thus, it appears that the project contemplates multiple types of events, including (1) 2,000 person concerts and (2) 5,000 person “other” events. (DEIR at ES-6 [(“top deck trails would also lead park users to a variety of flexible spaces for park programmed events including art fairs, concerts and other performances, dog training events, food fairs, and kite flying competitions among others”).]) Because there appears to be no specific limitations on timing or overlap of such events, the DEIR must analyze impacts associated with the operation of multiple events on both weekdays and weekend days.<sup>5</sup>

The DEIR’s trip figures are also based on the assumption that events would “likely” be held primarily on the weekend. However, there is no support for this assertion, as the DEIR does not appear to contain any express prohibition against holding events on weekdays. The DEIR cannot simply assume that weekday events will not occur for purposes of trip generation and impact assessment when it is merely “likely” that special events would not occur on weekdays.

**B4-4  
cont.**

The DEIR also notes that “background traffic is lower” on the weekend. This assertion is also flawed and unsupported by factual evidence as no weekend traffic counts are provided. (DEIR at 3.14-9.) While weekend peak hour traffic may generally be less than weekday peak hour traffic, there is still a considerable amount of traffic throughout the day on weekends and in light of the specific uses within close proximity to the project site that are heavily used on weekends, we believe that weekend traffic may be significant, if not higher than weekday traffic. For example, Rose Hills, the Pico Rivera Sports Arena, the California Country Club, and the Whittier Narrows are all uses within the project’s immediate vicinity that likely generate significant weekend traffic. Thus, weekend traffic counts must be performed and potential impacts to area intersections resulting from project-related traffic must be analyzed. Also, as regional park uses are not heavily dependent on peak hour trips, we question whether a traffic analysis that is premised only on AM and PM peak hour trips provides an accurate assessment of the project’s traffic impacts. An EIR’s use of a threshold that precludes meaningful consideration of all of the project’s environmental impacts violates CEQA’s informational disclosure requirements. (*Berkeley Keep Jets Over the Bay Com. v. Board of Port Comrs.* (2001))

<sup>4</sup> It appears this scenario – 5,000 patrons for an event plus normal park traffic – was never analyzed because, as the EIR notes, weekend traffic would be less than weekday traffic. This omission is fatal under CEQA.

<sup>5</sup> The EIR appears to omit any analysis of traffic impacts associated with special events. This is inappropriate, especially given special events are likely to result in patrons arriving and departing at similar times, thus increasing the burden on nearby roadways.

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91 Cal.App.4th 1344, 1381-1382 [A CEQA violation occurs when an EIR applies an ironclad threshold that eliminates important analysis and fails to account for a project's true environmental impacts].)

The DEIR also uses trip generation rates developed by the San Diego Association of Governments. The "Regional Park" designation was used, but the DEIR does not state why the use of this designation is reasonable. While the proposed project may be regional in nature, it will include significant amenities not typically associated with parklands (such as an amphitheater, numerous plazas with visitor amenities including cafes, a trail lift tower, and a zip line). These amenities are more consistent with amusement parks, thus the DEIR's traffic generation numbers appear to underestimate estimated traffic.<sup>6</sup> The DEIR attempts to justify its calculations by reference to attendance data from Schabarum Regional Park and Santa Fe Dam Recreation Area, and states that the Regional Park generation rates are conservative. (See DEIR at 3.14-13.) However, neither of these parks have the types of amenities that are proposed at the project, which makes their use for comparison purposes inappropriate.

**B4-4  
cont.**

Because the traffic generation assumptions are flawed, the DEIR must be revised to ensure all potential traffic impacts are appropriately identified to comply with CEQA.

b. The EIR's Analysis of Impacts Associated With the Rose Hills Access Road Are Not Supported by Substantial Evidence.

The DEIR correctly notes that Rose Hills would utilize the access road proposed by the project, which is required per the 1999 Amended Setback and Easement Agreement ("Easement Agreement"). However, when analyzing potential impacts associated with the road's usage, the DEIR overestimates impacts from Rose Hills and fails to include evidence supporting its conclusions.

**B4-5**

With respect to the potential impacts of Rose Hills traffic on other park road users, the DEIR concludes that funeral processions would result in a temporary significant impact. To alleviate this impact, MMs T-1 and T-4 are imposed. This conclusion is unsupported by evidence, as it is unclear on what basis it was determined that possible "temporary delays" to other users should be considered significant. (DEIR at 3.14-36.) The DEIR did not include a threshold of significance or standard against which to determine that such delays would be significant, but rather appears to just have simply concluded that a "temporary delay" should be

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<sup>6</sup> The San Diego Association of Governments' (*Not So*) *Brief Guide of Vehicular Traffic Generation Rates For the San Diego Region* notes that amusement parks have a significantly higher trip generation rate. Alternatively, the city park designation would also be more appropriate, as it recognizes that parks that are developed (including such things as meeting rooms and sports facilities) generate higher rates. Here, the proposed project would be heavily developed with facilities designed to attract patrons.

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considered significant. This is inappropriate, and does not comply with CEQA. (*Communities for a Better Environment v. California Natural Resources Agency* (2002) 103 Cal.App.4th 98, 110-111 [CEQA requires the use of significance criteria to determine whether a given environmental effect should be considered significant].)

As the DEIR notes, funeral processions occur throughout the region and provisions have been adopted to accommodate funeral processions in the California Vehicle Code and the Los Angeles County Municipal Code. (DEIR at p. 3.14-36.) To our knowledge, the impact of funeral processions on city streets and circulation have not been identified as or considered significant impacts where there is a considerably greater volume of traffic and many more cross-streets and intersections than the proposed access road would experience. Given that these processions are not considered significant impacts on daily city traffic, we do not see how the DEIR has reached the conclusion that Rose Hills funeral processions would result in a significant impact warranting mitigation.

The DEIR also identifies funeral processions as creating a significant impact on emergency vehicle access. (DEIR at 3.14-57.) The assumptions in the DEIR are faulty and unsupported. The DEIR asserts that if a funeral procession were using the shared park access road, the physical constraints of the road (2 lanes, no shoulder) would make it difficult for emergency vehicles to safely pass and concludes that the potential for delays to emergency service vehicles by funeral processions for those limited segments of road with inadequate passing space represent a potentially significant impact. The analysis fails to address the fact that – as the DEIR itself notes – funeral processions include trained motorcade escorts. (DEIR 3.14-20.) Given the presence of the trained motorcade escorts, in the event of an emergency, the motorcade escorts could safely direct traffic to provide safe passage for the emergency vehicle. Because the DEIR did not consider how the trained motorcade escorts could affect this potential impact, this analysis must be revised.

The DEIR also concludes that Rose Hills' traffic would significantly impact park users, including trail users, but fails to make those same conclusions with respect to other park-traffic use of the access roads. For example, the DEIR concludes that Rose Hills-related traffic would significantly impact users of the Schabarum-Skyline Trail primarily because funeral processions may cause delays or jeopardize safety. (DEIR at 3.14-38.) It is unclear, however, why this impact would be limited to Rose Hills-related traffic. The DEIR notes that park-related vehicular traffic would cross both the multi-use trail and the Schabarum-Skyline Trail at numerous locations, yet apparently concludes that there would be no impacts to trail users because "best practices" would be employed to minimize the potential for conflicts. (DEIR at 3.14-52; DEIR Figure 3.14-6.) The DEIR cites to a number of external documents, namely the *County of Los Angeles Trail Manual* (which "includes plans for both at-grade crossing and grade-separated crossings of multi-use trails") as justification for this conclusion, but fails to

**B4-5  
cont.**

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specify what, if any, physical improvements would be made. (DEIR at 3.14-52.) The DEIR provides no substantial evidence in support of the distinction drawn in the DEIR between Rose Hills-related traffic and traffic generated by park users. Given the high number of park users, especially during large events of 5,000 people or more, the impact of these crossings must be analyzed consistently throughout the DEIR.

The DEIR traffic analysis is being used inappropriately to impose additional restrictions on Rose Hills' use of the access road that are not otherwise required by the Easement Agreement. The Easement Agreement imposes a mandatory duty on the County Sanitation District to grant an easement for roadway purposes to Rose Hills. Importantly, the Easement Agreement does not allow the County or District to include the limitations included within the mitigation measures, including (1) the funding of public service expenses, (2) mandating that Rose Hills design and construct improvements, or (3) requiring Rose Hills to provide notice prior to funeral processions.

Finally, the DEIR must recognize that the proposed project, by developing uses that will attract patrons, is primarily the driver creating potential impacts associated with use of the access road that require mitigation, not Rose Hills (which has rights to the easement independent of the park and whose trips are already included within the existing roadway). For instance, it is only because the proposed project includes both public use of the roadways and increased pedestrian use of multi-use trails that the DEIR concludes that there would be a significant impact requiring mitigation. The road and any future use by Rose Hills would not, in and of itself (absent park-uses), create an impact. It is the project's impacts, particularly the introduction of new users that creates the significant circulation impact described in the DEIR, not Rose Hills. Thus, any significant impacts that may be identified in this analysis are the direct result of the proposed project, and any mitigation must be designed to minimize such impacts to the greatest extent possible and implemented by the project proponent, not a third party (i.e., Rose Hills) that has an existing right to use the access road.

**B4-5  
cont.**

c. The DEIR Fails to Analyze the Trip Distribution Impacts of the Project.

The DEIR traffic analysis focuses exclusively on Rose Hills' use of the shared access road but provides no substantial evidence that a significant impact may actually result. Moreover, the DEIR in focusing on Rose Hills ignores the actual objective of an EIR: the analysis of impacts of the proposed project, not an adjacent existing use. Because of its almost exclusive focus on the shared access road, we are concerned that the DEIR does not adequately take into account the actual distribution of trips going to the proposed park. There is a lack of consideration as to whether park users may attempt to enter the park through Rose Hills particularly on those days in which there is congestion at the entry plaza. Because the shared accessway provides an eastern entrance to Rose Hills it is logical to assume that regular park

**B4-6**

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users will realize that the main Rose Hills entrance provides an alternative access point to the regional park. The potential for some percentage of park users to use Rose Hills as a “cut through” to enter the park should be considered and the impact of “cut through” traffic on Rose Hills’ roads and operations must be taken into consideration and analyzed, and if the proposed project’s traffic results in significant impacts to Rose Hills’ internal circulation system, mitigation must be provided.

**B4-6  
cont.**

**IV. The DEIR’s Traffic Mitigation Measures Violate CEQA.**

a. The Mitigation Measures Are Unenforceable, and Therefore Infeasible.

In addition to an incomplete analysis of the traffic impacts of the proposed project, the DEIR inappropriately imposes mitigation measures on Rose Hills. This not only violates CEQA, as discussed below, but would also impose significant hardships on Rose Hills. Rose Hills is fundamentally dependent upon consistent access for its families and visitors, including those coming as a part of a funeral procession. While it understands that the access road may have multiple users, the DEIR exceeds its responsibility to mitigate the significant impacts of a **proposed project** by imposing mitigation on an unrelated third party’s existing operations that do not present significant impacts. Separate from compliance with CEQA, however, the DEIR’s proposed mitigation imposes substantial restrictions on Rose Hills’ existing and future uses of its property which it opposes. For example, MM T-2 prohibits any funeral processions on the shared access road on days with scheduled performances to avoid traffic congestion and improve safety. This means that Rose Hills would be prohibited from using the shared access road for funeral processions on at least twenty-five days per year. The DEIR also recommends that Rose Hills provide 24 hour notice to the park for funeral processions. It is not Rose Hills’ responsibility to mitigate the impacts of the proposed project’s traffic; it is the responsibility of the proposed project to mitigate its impacts on the baseline traffic conditions, which includes Rose Hills and its funeral processions. (DEIR at 3.14-58.) As noted in the DEIR, such performance events are likely to occur on weekends, a very busy time in terms of cemetery operations for Rose Hills. A prohibition on funeral processions is a significant restriction on Rose Hills’ existing operations. Funeral processions are a part of the normal operations, i.e., the baseline of existing conditions, of Rose Hills. The project’s impact on these baseline conditions must be analyzed and mitigated. It is not the responsibility of the existing baseline to limit its activities to facilitate the impacts of a proposed project.

**B4-7**

Similarly, MM T-1 would require Rose Hills to enter into a tri-party agreement with the County and the Sanitation Districts imposing additional, currently unknown restrictions and obligations on Rose Hills. (DEIR at 3.14-58.) The mitigation measure envisions limiting the number, size and schedule of funeral processions at Rose Hills, and other unidentified measures to offset the impacts of Rose Hills’ traffic – as opposed to the proposed project’s traffic -- on the

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access road. It is unclear what the exactly the nature of such restrictions could be, but any additional restrictions would heavily burden Rose Hills.

MM T-3 requires Rose Hills to fund the design and construction of a trail overcrossing at the intersection of the Schabarum-Skyline Trail to permit trail users to safely bypass funeral processions and vehicular traffic – from both cemetery as well as park uses. As discussed above, the DEIR has failed to provide any substantial evidence that funeral procession traffic will have a significant impact on recreational users of the trail requiring mitigation. Also, it is the responsibility of the project that is bringing more recreational users to the site to address potential impacts (if any) of the new uses on the existing environment (funeral processions).

The fundamental purpose of an EIR is to identify ways in which the significant impacts *of a proposed project* can be feasibly mitigated or avoided. To implement this purpose, an EIR must describe feasible mitigation measures that can minimize *the project's significant environmental effects*. (Kostka & Zischke, Practice Under the California Environmental Quality Act at § 14.10.) The DEIR has misinterpreted and misapplied CEQA by imposing mitigation measures on an unrelated, third party adjacent landowner to address its existing operations as opposed to imposing this obligation on the project proponent to mitigate its significant impacts.

The mitigation measures imposing certain restrictions/requirements on Rose Hills are not feasible because they are not legally binding on Rose Hills. Rose Hills is not the project proponent that is required to mitigate its impacts under CEQA. An EIR should discuss mitigation measures that are *feasible*, practical and effective. (*Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 365.) CEQA defines feasibility as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account” various factors. Pub. Res. Code § 21061.1. A mitigation measure is infeasible if it cannot be legally enforced or imposed. (*Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912, 938.) Here, the mitigation measures requiring specific action by Rose Hills, specifically MMs T-1, T-2, T-3, T-4, and PS-4 are not legally feasible because they are not legally enforceable against Rose Hills.

This fundamental principle is also consistent with the requirement that mitigation measures be “fully enforceable through permit conditions, agreements, or other legally binding instruments.” Here, the mitigation measures are not legally binding on Rose Hills, which is not subject to or bound by mitigation measures identified in this DEIR.

b. Mitigation Measure T-1 Constitutes Improper Deferral of Mitigation.

CEQA prohibits the deferral of mitigation, which means that when a significant impact is identified, the formulation of measure to mitigate those impacts must occur before the project is

**B4-7  
cont.**

**B4-8**

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approved. (*Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 906.) An EIR defers mitigation when it includes loose or open-ended obligations, and fails to include specific performance criteria designed to mitigate the significant impact. (*Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 944.) For example, California courts have concluded that a lead agency goes too far when it simply requires a project applicant to obtain a biological report and then comply with any recommendations that may be made in the report. (*Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1275.)

Here, the DEIR includes a mitigation measure – MM T-1 – that requires the County, Sanitation Districts, and Rose Hills to enter into a tri-party agreement “setting forth each of the parties rights and responsibilities for the construction, maintenance, and use of the access road and any extension or modifications thereto.” (DEIR at 3.14-56.) First, the only party on which mitigation for significant environmental impacts of the project can be imposed is the project proponent, i.e., the County, not an adjacent landowner. Second, the impacts this agreement is designed to address have not been adequately substantiated (see above). Third, the mitigation measure does not include any specific performance criteria that ensures the alleged significant impacts identified in the DEIR are appropriately mitigated. Rather, it sets forth vague objectives without including specific, concrete performance criteria that are designed to reduce significant impacts. Thus, without specific performance criteria or measures, it is patently unclear whether or not the agreement contemplated by MM T-1 would actually mitigate the significant traffic impacts identified. This constitutes improper deferral of mitigation under CEQA.

**B4-8  
cont.**

**V. The DEIR Fails to Analyze the Cumulative Impacts on Water.**

Section 3.15, Utilities and Service Systems analyzes the project’s impact on water, wastewater, solid waste and electricity. Water supply and the coordination of infrastructure construction and operation is of great concern to Rose Hills in light of its use of water for its operations. The DEIR concludes that the development of Phases I and II of the project would not create water capacity problems due to its irrigation needs and that impacts would be less than significant. Rather than providing a quantitative analysis, the DEIR concludes without any supporting evidence that impacts to water from future phases would be similar to Phases I and II, and that improvements to the reclaimed water system would be provided, and therefore, impacts are less than significant. Even if these statements were true, the DEIR’s analysis of the water impacts of Future Phases is conclusory and lacking in any evidentiary support for its conclusions of less than significant. The analysis should be revised to provide evidentiary support that quantifies future use, and identifies future infrastructure and how it will be constructed as well as any impacts, in support of these conclusions.

**B4-9**

Of greater concern, however, is the DEIR’s broad brush analysis of the project’s impact on water and reclaimed water. The Sanitation District has notified users that it is no longer

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considering new projects that would require reclaimed water. Due to the drought, there is less water flowing to the reclamation plants and thus reduced volumes of reclaimed water are available. The DEIR should take into consideration the recent notification from the Sanitation District on the availability of reclaimed water and how this would affect the amount needed for park operations. In addition, it must revise the DEIR's analysis of the water usage of the High Build Alternative, as well as the Cumulative Impacts analysis of water usage. Similar to the broad brush analysis of impacts in the DEIR, the cumulative impacts analysis is devoid of any evidence to support its conclusions that any increases of the project and the cumulative projects will be met by existing and proposed utility systems. The DEIR basically states that since the cumulative projects would be required to address site specific issues, the cumulative impacts are less than significant. In short, the DEIR has not provided a true cumulative impacts analysis that considers the impacts of the project, its contribution when added to the impacts of other past, present, and reasonably foreseeable projects, and a determination of significance against identified thresholds of significance. In addition to the potential reduction in the availability of reclaimed water that was not considered, the DEIR also fails to take into consideration as a cumulative impact the water needs of other existing users such as Rose Hills, whose operations have been permitted to expand, and thus its consumption of water for irrigation will also increase. These cumulative increases were not addressed in any detail in the DEIR, but should have been. The DEIR's analysis of the water needs of Future Phases, the High Build Alternative, and the project's contribution to cumulative impacts must be provided in a revised DEIR.

**B4-9  
cont.**

**VI. The Low Build Alternative is Environmentally Superior to the Proposed Project and Should be Approved.**

The DEIR analyzes two project alternatives to the proposed project: the Low Build Alternative and the High Build Alternative. Rose Hills supports and would encourage the County to approve the Low Build Alternative. The Low Build Alternative would eliminate the significant environmental impacts of the project (DEIR at 4-47), including those that would jeopardize nearby sensitive operations at Rose Hills. As discussed above, Rose Hills has worked cooperatively over the years with the District to be a good neighbor to the landfill and to coordinate their respective developments and land uses, and would hope that as County Parks considers how the landfill should be redeveloped for park and recreation uses that it consider adoption of the Low Build Alternative which ensures that Project Objective #12 – balancing multiple project objectives in a manner that considers the competing interests and needs of adjacent entities – is met.

**B4-10**

The Low Build Alternative achieves the goal of the County to develop a regional destination park (Objective #2) that is a "Park for All" (Objective #1) that integrates recreational facilities with natural habitats (Objective #5), promotes wildlife movement and habitat

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connectivity (Objective #6) in an environmentally sustainable manner (Objective #7). As set out in Table 4-2, the Low Build Alternative also meets a number of other project objectives, and should be seriously considered for approval by County Parks.

We note that the analysis of the Low Build Alternative in the DEIR is flawed and that the analysis is skewed to support approval of the proposed Project as compared to the Low Build Alternative. The project objectives and its application to the Low Build Alternative appear to be narrowly drawn to allow for summary dismissal of the Low Build Alternative. This is inappropriate under CEQA. (*North Coast Rivers Alliance v. A.G. Kawamura* (2016) 243 Cal.App.4th 647, 654 [project objectives may not be crafted such that they are artificially narrow].) For example, the Low Build Alternative does not include *any* active recreational uses, although it surely could have included such uses and still be considered a Low Build Alternative. Because there are no active uses, the DEIR concludes the Low Build Alternative is inconsistent with Objectives 1, 3 and 5, all of which identify active amenities as goals of the project. The DEIR's artificially narrow characterization of the Low Build Alternative intentionally sets up the Low Build Alternative to fail, and by so doing, the DEIR precludes meaningful consideration of a reasonable range of alternatives.

The DEIR's alternative analysis also is conclusory and devoid of evidentiary support for its conclusions. For example, the DEIR fails to provide support as to why the Low Build Alternative would not meet Project Objective #4 to attract diverse, new audiences, particularly underrepresented or disadvantaged populations, to inspire connection to the outdoors. As discussed in the Executive Summary, the Low Build Alternative would include a park entry plaza, a Nike Hill scenic overlook, significant trail development, interpretive/overlook areas, and picnic areas. (DEIR at ES-11.) These are all amenities that would be attractive to diverse groups, and thus the Low Build Alternative would meet this objective; yet the DEIR summarily concludes that it would not attract diverse new audiences due to its focus on passive recreation. There is simply no evidence that disadvantaged populations would not enjoy the opportunity to commune with nature through passive recreational activities, and that they would only be attracted to a park if it includes performances and a zip line.

As another example of the DEIR's skewed analysis, Project Objective #8 asks whether the project or alternative would provide multi-modal, universal access and circulation into and through the park to the extent feasible. The DEIR concludes the Low Build Alternative would not meet this objective, despite the fact that the Low Build Alternative would still include extensive road circulation improvements and miles of trail development. Again, application of this objective to the Low Build Alternative appears to be intentionally designed to allow for easy dismissal of the Low Build Alternative.

**B4-10  
cont.**

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Because of the flawed and unsupported conclusions in the analysis of the Low Build Alternative that appear to be intentionally designed to allow for dismissal of the Low Build Alternative in favor of the proposed project, the DEIR has failed to satisfy CEQA's requirement to provide meaningful evaluation, analysis and comparison of alternatives to the proposed project. (CEQA Guidelines §15126.6(d).) For these reasons, the DEIR should be revised to provide an adequate analysis of the Low Build Alternative. Such an analysis would demonstrate that the Low Build Alternative is not only environmentally superior because it minimizes many of the adverse significant effects on Rose Hills and adjacent land uses, but is also capable of feasibly meeting most of the basic objectives of the project. Rose Hills reiterates its support of the Low Build Alternative and encourages a more thorough analysis of this alternative.

**B4-10  
cont.**

**VII. Conclusion.**

In conclusion, Rose Hills is very concerned with the DEIR's lack of adequate analysis of all of the environmental impacts of the proposed Project. As demonstrated above, the DEIR reflects significant analytic gaps and legal deficiencies in its consideration of aesthetic, noise and traffic impacts of the proposed project and alternatives. The DEIR should be revised to address these deficiencies and recirculated for public review before the County rushes to a decision. The Puente Hills Landfill Park Master Plan is intended to provide a blueprint for redevelopment of the landfill over the next 30 years. Because of the long term impact of this planning process, it is important for the County to carefully consider and analyze all aspects and impacts of the proposed Project and to provide County decisionmakers with a complete and comprehensive EIR that analyzes all potential impacts and all feasible alternatives. The current draft does not satisfy the rigorous mandates of CEQA to fully inform decisionmakers of all environmental consequences of its proposed decision. For these reasons, the DEIR should be revised and recirculated, and a thorough analysis of alternatives conducted. Such an analysis would demonstrate the environmental superiority of the Low Build Alternative due to its ability to reduce project impacts, particularly to adjacent, sensitive receptors, and accomplish the project objectives.

**B4-11**

Very truly yours,

A handwritten signature in black ink, appearing to read "Susan K. Hori".

Susan K. Hori  
Manatt Phelps & Phillips, LLP

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Cc: Patrick Monroe  
Jeff Nordschow  
Bruce Lazenby  
Michael Baron

317337554.2

## **Responses to Letter B4 – Rose Hills Memorial Park**

### **Response to Comment B4-1:**

This comment states that the Draft PEIR does not adequately analyze the project's impacts to scenic vistas from Rose Hills. However, the Draft PEIR provides detailed assessment of the potential visual impacts on views of the existing landfill from Rose Hills. As discussed in the PEIR and further below, existing views toward Nike Hill include views of existing power lines and towers. Views of the landfill decks themselves were historically of daily trash disposal and heavy equipment operation, and most recently of bare dirt on landfill decks with heavy equipment periodically performing maintenance and repair activities. The PEIR correctly assesses potential visual impacts in the context of changes from this environmental baseline. However, Section 4.0, Revisions to the Draft PEIR (revisions 27 and 28) of this Final PEIR, provides targeted clarifications to the impact analysis to scenic vistas. Additional discussion is also provided below.

As stated in the comment, Rose Hills is a privately-owned memorial park. It is open to the public for the primary purpose of funeral services, gatherings, and for visitation. For purposes of determining significance under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Though Rose Hills is open to the public, it is not a place the general public would normally go to for the purpose of viewing the surrounding area.

We agree that Rose Hills provides numerous viewpoints of the San Gabriel Mountains, San Gabriel Valley, and the Los Angeles Basin. However, it should be noted that not all areas of the memorial park offer viewpoints to these visual resources and not all views of these three visual resources would qualify as a scenic vista. A scenic vista would need to offer an expansive view of a highly valued landscape. Therefore, a view of any of these three visual resources that is not expansive would not be classified as a scenic vista.

For views of the San Gabriel Valley from Rose Hills a viewer would need to look in a northwest or western direction (Figure B4-1 and B4-2). The Proposed Project is located to the north and northeast of Rose Hills. When looking north from Rose Hills the topography of the Puente Hills (Nike Hill and skyline ridge) blocks views of the San Gabriel Valley to the north and northeast (see Figures 3.2-15 through 3.2-18 in Section 4.0 of this Final PEIR).

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*Figure B4-1 View from Rose Hills Looking Northwest to the San Gabriel Mountains from the Road Between the Greenwood Gardens II and Angel Heights Lawn*



*Figure B4-2 View from Rose Hills Looking Northwest from the Rose Hills Fence at Angel Heights Lawn*

For views of the Los Angeles Basin from Rose Hills a viewer would need to look west and southwest (Figure B4-3).



*Figure B4-3 View from Rose Hills Looking West from the Garden of Comfort II Lawn*

The view of the Los Angeles Basin from Rose Hills offers a dramatic aerial snapshot of the urban development of the Los Angeles region. For a Rose Hills visitor to enjoy this view he/she would need to look in the opposite direction from the Proposed Project.

Views of the San Gabriel Mountains can be seen throughout Rose Hills. However, for these views to be classified as a scenic vista it must be an expansive view of a highly valued landscape for the benefit of the general public. Due to the topography of the Puente Hills, expansive views of the San Gabriel Mountains are limited to areas of high elevations within Rose Hills, such as the Buddhist Memorial Columbarium or the Loma de la Madre. In terms of potential impacts of the proposed Project, minimal views of the top decks of the landfill or proposed structures would be available to viewers from high elevation areas within Rose Hills due to the topography of the Puente Hills and existing man-made structures that intervene in the line of sight of viewers looking north and northeast towards the Proposed Project. As stated in Section 4.0 of this Final PEIR (revisions 27 and 28), scenic vistas of the San Gabriel Mountains are not anticipated to be affected.

The addition of the trail lift structure and added movement from the trail lift cart would attract the attention of Rose Hills' visitors. However, this movement would occur in an area that is not considered a scenic vista, as explained in Section 4.0 of this Final PEIR (revisions 27 and 28). Therefore, as discussed above, potential project impacts to existing distant views from Rose Hills would remain less than significant.

**Response to Comment B4-2:**

This comment states that the Draft PEIR's analysis of the Proposed Project's potential to degrade the existing visual character of the surrounding environment is inadequate. Please see

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Section 4.0, Revisions to the Draft PEIR, revisions 27 and 28 for revisions added to clarify the impact analysis to the existing visual character of the surrounding environment.

The commenter states that Draft PEIR summarily concludes that views of Nike Hill are already dominated by man-made structures. Revision 27 in Section 4.0 of this Final PEIR includes additional photographs that depict the existing man-made structures located on Nike Hill, which support the statement that Nike Hill is dominated by man-made structures.

The commenter also states that views of Nike Hill are not the only views of the project site that must be considered since there are other project areas visible from Rose Hills. Revision 27 in Section 4.0 of this Final PEIR describes the areas of the project site that are visible from Rose Hills. Visible project areas include the Western Deck, Nike Hill buttress, and Nike Hill. Views of these areas would only be available to Rose Hills visitors near the northern property fence at the Garden of Commemoration II Lawn, as depicted in Figure 3.2-17. The existing visual character of this area is that of a sparsely vegetated site with strong visual reminders of its past industrial use due to the geometric forms of the grading of the landfill cap and slopes, including ongoing periodic operation of heavy equipment for landfill maintenance. Figure 3.2-17 depicts existing views of this area, which include vegetated slopes, barren top decks, radio towers, power pole, and a water tank. There is ongoing Nike Hill buttress construction and landfill maintenance activities being conducted by the Sanitation Districts.

#### Western Deck

From Rose Hills, visitors would only have views of the western edge of the Western Deck, as shown on Figure 3.2-17. In this area the Proposed Project would develop a running loop and a bike skills area, along with added revegetation of these largely barren areas. These features are not structures and would be partially blocked from view by trees and hedges to be planted throughout the Western Deck as depicted in Figure 2-5. With the addition of such vegetation and low level park structures, changes in view would likely be considered as beneficial by many viewers.

#### Nike Hill Buttress

Rose Hills visitors would have views of the Nike Hill buttress, which is currently under construction. The Proposed Project would modify the Nike Hill buttress by adding a road and a segment of the re-routed Schabarum-Skyline Trail, which is being relocated away from the Rose Hills property. The road and trail would follow the contours of the buttress into the Western Deck. This area already contains a paved road along the skyline ridge leading to Nike Hill; therefore, the addition of the project road and rerouting of the Schabarum-Skyline Trail are not anticipated to substantially affect the visual character of the area.

#### Nike Hill

Views of the west and partial views of the north face of Nike Hill would only be available to Rose Hills' visitors near the northern property fence at the Garden of Commemoration II Lawn looking northeast towards Nike Hill (Figure 3.2-17). As seen in Figure 3.2-17, views of Nike Hill contain vegetated slopes, radio towers, power poles, a water tank, a paved road, and trees. The Proposed Project would add a scenic overlook, trail lift tower, mini café, staff offices,

restrooms, and a zip line tower. As shown in Figure 2-5, these structures would be built near the existing Nike guard structure and ornamental trees and north of the existing approximately 150 to 200 foot tall SCE transmission line lattice towers, radio towers, and the water tank. As depicted in Figure 3.2-17, views of the west face of Nike Hill are already dominated by man-made structures. The Proposed Project's mobile amenities (trail lift and zip lines) do have the potential to attract the attention of Rose Hills visitors with views of the west face of Nike Hill (visitors near the Garden of Commemoration II Lawn). The proposed trail lift and zip line would be at their highest point at Nike Hill. As they travel west they would appear lower and lower above the skyline ridge as they reach the second towers in their respective alignment located in the M&O Yard, as depicted in Figure 2-5. This movement would only be visible for a limited viewing window. Furthermore, the aerial view in this area already contains high tension power lines associated with the SCE transmission line (Figure B4-2). The further southwest a visitor moves from the Rose Hills northern fence views of Nike Hill and of the proposed structures would become partially blocked by existing ornamental trees, as depicted in Figure 3.2-18. Therefore, the addition of the project structures to Nike Hill is not anticipated to substantially affect the visual character of the area.

As discussed above and throughout Section 3.2 of the Draft PEIR, project impacts would remain less than significant as the changes from the existing environmental baseline would not be substantial.

#### **Response to Comment B4-3:**

This comment states that noise impacts to Rose Hills Memorial Park were not adequately addressed in the Draft PEIR.

With regard to Proposed Project's construction-related noise, Section 12.08.440, Construction Noise, of the County's Code discusses the limitations of construction noise. As discussed on Page 3.11-15 of the Draft PEIR, Section 12.08.440(A) of the County's Code states:

Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 P.M. and 7:00 A.M., or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited.

As discussed in Section 3.11.4.1 of the Draft PEIR (Page 3.11-19), although construction noise associated with the Proposed Project would have a temporary or periodic increase in the ambient noise levels within the project vicinity, construction activities would occur between the hours of 7:00 A.M. and 7:00 P.M. Mondays through Saturdays (excluding federal holidays). Construction activities would therefore be in compliance with the County's Code regarding construction noise, and it was determined that construction-related noise impacts would be less than significant. Further, both the historic and current environment include the operation of heavy equipment across the site associated with post-closure landfill maintenance activities. It should also be noted that the nearest Rose Hills chapel to the project site is the SkyRose Chapel located over 2,000 feet south and southwest of the project boundary.

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Because no significant construction noise impacts would occur, the County DPR is not required under CEQA to include mitigation measures to avoid or reduce impacts. Nonetheless, the County DPR has agreed to implement Mitigation Measure N-1 (refer to Section 3.11.5 on Page 3.11-26 of the Draft PEIR), which includes measures to further reduce construction noise associated with the Proposed Project.

In addition, it is also noted that previous operations associated with the landfill (including continuous excavators and front loader operation) likely resulted in greater noise levels at Rose Hills Memorial Park. There is ongoing Nike Hill buttress construction and landfill maintenance activities being conducted by the Sanitation Districts.

With regard to operational noise associated with the Proposed Project, the County does not provide specific impact thresholds for cemeteries; however, Figure 2 within Appendix C of the California Office of Planning and Research's (OPR) General Plan Guidelines (2003) provides acceptable ranges for noise levels for several types of land uses, including cemeteries. Table 3.11-4 on pages 3.11-10 and 3.11-11 of the Draft PEIR was intended to reflect Figure 2 in Appendix C of OPR's General Plan Guidelines; however the table in the Draft PEIR is inadvertently incorrect. Accordingly, Table 3.11-4 has been replaced with the correct acceptable ranges for noise levels per land use (refer to the Section 4.0 of the Final PEIR for the corrected Table 3.11-4).

Based on the corrected Table 3.11-4 of the Final PEIR, the maximum "normally acceptable" noise level for cemeteries is 75 dBA CNEL. "Normally acceptable" is defined as, "Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements." As shown on Figure 3.11-2 in Section 4.0 of the Final PEIR, the Proposed Project's worst-case operational noise levels associated with the proposed performance space would be no greater than 65 dBA CNEL, which is less than the 75 dBA CNEL threshold defined for cemeteries. Accordingly, worst-case noise impacts to Rose Hills Memorial Park from operation of the Proposed Project would be less than significant, and no mitigation measures would be required.

**Response to Comment B4-4:**

The comment suggests that the Draft PEIR trip generation analysis is flawed, that the Draft PEIR must analyze impacts associated with multiple special events, and that weekend impact analysis must be performed.

In regards to trip generation, a number of potential sources for applicable trip generation rates were reviewed at the outset of the study and the rates from the San Diego Association of Governments' (SanDAG's) *Traffic Generators*<sup>1</sup> for developed regional parks were determined to be the most appropriate. The SanDAG document includes rates for developed city parks, developed regional parks, and undeveloped neighborhood/county parks. The Institute of Transportation Engineers' (ITE's) *Trip Generation Manual*<sup>2</sup> includes rates for city parks, county parks, and regional parks. The Proposed Project is a regional county park that would be partially developed but mostly undeveloped (over two thirds of the project site would be dedicated to passive recreation). Rates for developed city parks (as opposed to developed

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<sup>1</sup> San Diego Association of Governments, *San Diego Traffic Generators*, 2002.

<sup>2</sup> Institute of Transportation Engineers, *Trip Generation Manual*, 9<sup>th</sup> Edition, 2012.

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regional parks) are higher per acre than is appropriate for the Proposed Project since developed city parks are generally more intensely developed and programmed on a per acre basis. SanDAG rates were chosen instead of ITE rates because SanDAG rates for developed regional parks are higher than ITE rates for county and regional parks.

A comparison of the estimated vehicle trips (2,340 daily, 94 during the AM peak hour, and 187 during the PM peak hour) against projected monthly attendance figures for the Proposed Project indicates that the trip generation estimates in the traffic analysis are conservative. Estimated monthly attendance figures for the proposed recreation uses at the park are shown in Table 3.9-1 on page 3.9-10 of the Draft PEIR. As shown in the table, recreational attendance at full build-out of the Proposed Project is estimated at 27,200 visitors per month on days without events in the performance space, plus 2,000 to 5,000 visitors per month for events in the performance space. The daily trip generation estimate of 2,340 trips in the traffic study represents 1,170 daily vehicles (since each vehicle generates two trips: one inbound and one outbound). Assuming an average vehicle occupancy (AVO) of 2.0 visitors per vehicle (which is a conservative estimate for a family-oriented park space), this translates to 2,340 daily attendees, which is equivalent to saying that approximately 9 percent of the estimated monthly attendance would occur on one day. Another way to look at this is that attendance on an average weekend day could be over seven times the attendance on an average weekday (assuming approximately 21 weekdays per month and approximately 9 weekend days per month) without exceeding the 2,340 daily vehicle trips evaluated in the traffic study. Thus, the vehicle trip generation as estimated and evaluated in the traffic study (Draft PEIR Appendix H) represents a conservative estimate.

In regards to weekend analysis, as noted above, the vehicle trips evaluated in the traffic study are sufficiently high to encompass both weekday and weekend day visitation to the park, given the anticipated monthly attendance figures shown in Table 3.9-1. Furthermore, traffic levels on the public street system in the study area are substantially lower on weekend days than on weekdays. 24-hour machine traffic counts were conducted in 2016 on weekends as well as weekdays on three street segments (Crossroads Parkway South between State Route 60 (SR-60) eastbound ramps and Puente Hills Landfill Access Road, Workman Mill Road east of Peck Road, and Peck Road north of Workman Mill Road) as part of this study. Machine count data was also obtained from the Los Angeles County Department of Public Works for two additional segments (Workman Mill Road east of Crossroads Parkway and Workman Mill Road east of Mission Mill Road). Table B4-1, at the end of this comment letter response, summarizes the results. As shown in the table, Saturday volumes range from 45 to 75 percent (averaging 59 percent) of the weekday volumes on a daily basis, and from 51 to 86 percent (averaging 61 percent) for the highest peak hour in the day. Sunday volumes are even lower, ranging from 30 to 38 percent (averaging 36 percent) of the weekday volumes on a daily basis, and from 35 to 36 percent (averaging 35 percent) for the highest peak hour in the day. Since the traffic study evaluated trip generation based on SanDAG park rates that readily encompass the estimated attendance figures and since the weekend traffic volumes on the surrounding street system are substantially lower than the weekday volumes, the traffic impact analysis is conservative and additional quantitative analysis of weekend impacts is not necessary.

In regards to special events, as shown in Table 3.9-1 on page 3.9-10 of the Draft PEIR, 2,000 to 5,000 visitors are projected per month for events in the performance space. As stated on pages 3.12-4 and 3.14-47 of the Draft PEIR, the Proposed Project includes up to 25 events per year of up to 5,000 attendees for the largest events, meaning that a single large event could

account for much or all of a single month's anticipated event attendance. These events would be daytime events since, as stated on page 3.2-20 of the Draft PEIR, no nighttime performances would be allowed to preserve nighttime darkness for wildlife. The Draft PEIR did not assume that no events would occur on weekdays for the purpose of impact analysis; rather it stated that the events would primarily be on weekends and holidays. Quantitative analysis of the special events was not conducted due to the infrequent nature of the events. The Draft PEIR acknowledges (pages ES-59 and 3.14-47), however, that the special events could result in impacts to the internal and external circulation systems and emergency access during such events. As is commonly the case with event venues, traffic management plans are developed and implemented to manage event traffic and parking. Mitigation Measures PS-1, PS-2, PS-3, PS-4, T-2, and T-6 would mitigate these impacts to a less than significant level.

#### **Response to Comment B4-5:**

The comment suggests that no threshold was used to assess significance of impacts associated with funeral processions, that the presence of trained motorcade escorts was not considered, that the analysis of impacts at road/trail crossings is not consistent, that the Easement Agreement does not permit the County to include the limitations included within the mitigation measures, and that any significant impacts are caused by the park, not Rose Hills.

In regards to significance threshold, the pertinent thresholds are stated on pp. 3.14-27 and 3.14-53 of the Draft PEIR:

"Threshold: Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, **or otherwise decrease the performance or safety of such facilities.**" [emphasis added]

"Threshold: Would the project result in inadequate emergency access?"

The analysis and findings presented on pages 3.14-35 through 3.14-38 and pages 3.14-57 through 3.14-58 of the DEIR in regards to impacts associated with Rose Hills Memorial Park's use of the proposed easement through the park's internal roadway system are based on these thresholds. This analysis was further informed by the project goal to "provide adequate vehicular, multi-modal transportation, bicycle, equestrian, and pedestrian access to the park for all current and future users" (Draft PEIR page 2-18). In addition, prior planning documents including the June 2015 Draft Joint Powers Agreement (JPA) Amendment prepared by the Sanitation Districts and the Sanitation Districts' Puente Hills Landfill EIR provide that the proposed Rose Hills Memorial Park access road not impact the final recreational and operational needs of the park.<sup>3</sup>

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<sup>3</sup> As stated in the Draft JPA prepared by the Sanitation Districts (June 2015):

"The County's rights of use and access are non-exclusive and subject to existing licenses, easements, and other encumbrances, including an Amended Setback and Easement Agreement with the Rose Hills Company that provides for use of designated roadways to access the adjacent Rose Hills Memorial Park. The alignment and design of the aforementioned roadway access to Rose Hills Memorial Park shall not impact the final recreational and operational needs."

As stated on page 3.0-32 in Section 3.0 (Project Description) of the Sanitation Districts of Los Angeles County's *Continued Operation of the Puente Hills Landfill, Volume I: Draft Environmental Impact Report* (June 2001):

"In addition, the Sanitation Districts have provisionally agreed to provide access to the Rose Hills Memorial Park through the closed landfill site. The access road would be designed to not impact final recreational and operational needs."

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In regards to the presence of trained motorcade escorts accompanying funeral processions, Mitigation Measure T-4 is hereby revised as follows and included in Section 4.0 of this Final PEIR:

- T-4:** Rose Hills shall provide at least 24 hours advance notice to DPR staff for funeral processions that will travel through the Park to reach the Rose Hills property, including the estimated time of arrival. Rose Hills shall either ensure the presence of trained motorcade escorts with each funeral procession or fund deployment of County traffic enforcement personnel to ensure protection of public safety, ease of public access to the Park, and minimal interference with Park users. These measures shall apply to Alignment Alternatives 1, 2, and 3 for the Rose Hills access road. The requirements of this mitigation measure may become part of the tri-party agreement to be entered to among the County, the Sanitation Districts, and Rose Hills.

In regards to the analysis of impacts at road/trail crossings, different trail crossings were not considered inconsistently. To clarify, there would be multiple road/trail crossings within the park, including a crossing of the Multi-Use Loop Trail with the park access road at the base of the loop, two crossings of the Inner Loop Trail with the park loop road, two crossings of the re-routed Schabarum-Skyline Trail with the park loop road, and the crossing of the proposed Rose Hills Memorial Park access road with the Schabarum-Skyline Trail. A primary concern in the analysis is potential impacts related to the interface between equestrian users and motorists. The Schabarum-Skyline Trail is an existing regional multi-use trail. The proposed equestrian staging area (Parking Lot E, Southern Deck) would be near the Schabarum-Skyline Trail, and heavier levels of equestrian use are anticipated on the Schabarum-Skyline Trail and on the Inner Loop Trail connecting the equestrian staging area to other park recreational areas. Given this, the trail crossing of the Inner Loop Trail with the park loop road (from the Eastern Deck to the Southern Deck) is proposed to be grade-separated as part of the Proposed Project (Phase IV). The crossing of the Rose Hills Memorial Park access road and the Schabarum-Skyline Trail would be a location with a high level of equestrian use which would be further exacerbated by the presence of funeral processions on the Rose Hills Memorial Park access road leading to the potential for horses to be spooked while waiting during an extended time for a funeral procession to pass by. As such, crossing design must be optimized for trail user and vehicular traffic safety with either an at-grade or grade-separated crossing. A grade-separated crossing is considered to be appropriate at this location based on the analysis provided in the Draft PEIR. It should also be noted that the Schabarum-Skyline Trail currently exists and as such is part of the baseline, and so impacts associated with the new crossing with the Rose Hills Memorial Park access road would be created because of the implementation of the access road.

In regards to the ability of the County to impose limitations on Rose Hills Memorial Park's use of the access road, please refer to the Response to Comment B4-7 below. Also, the County's park development rights predate the agreement with Rose Hills and the Sanitation Districts by over 16 years. In regards to expenses that may be incurred by Rose Hills, the Easement Agreement states:

"The District shall not be obligated to improve or maintain the existing access road for use by the public, nor shall the District be responsible or liable for the maintenance of the access road after closure of Land fill. **Rose Hills hereby waives and releases the District and the County of Los Angeles, their officers, agents and employees,**

**from any and all claims, actions, liabilities, damages, costs, and expenses arising out of Rose Hills' use, improvement, maintenance, or exercise of the easement**, and further agrees to indemnify, protect, defend and hold the District and the County of Los Angeles, their officers, agents and employees, harmless from and against any and all claims, actions, liabilities, damages, costs and expenses of third parties arising from their use of the easement. Rose Hills shall name the District and County of Los Angeles as additional insureds on all policies of primary and excess liability insurance related to the operation of the Memorial Park." **[emphasis added]**

In regards to the attribution of impacts to the proposed park versus Rose Hills Memorial Park, as stated on pages 2-14 and 2-37 of the Draft PEIR, the Easement Agreement provides for a future roadway easement for ingress and egress by Rose Hills Memorial Park through the landfill area but provides that the permanent alignment of the roadway easement is subject to the master planning process for the future park. As stated on pages 3.2-16, 3.9-11, and 3.10-11 of the Draft PEIR, Phase III of the development of the Proposed Project would include the development of the Rose Hills Memorial Park roadway easement. The proposed Rose Hills Memorial Park access road through the landfill does not currently exist. As such, it is appropriate to consider impacts associated with both park recreational users and Rose Hills Memorial Park's use of the roadway easement when evaluating the potential for traffic impacts of the Proposed Project. The traffic impacts identified in the Draft PEIR as associated with Rose Hills Memorial Park's use of the roadway easement are indeed impacts of the Proposed Project, but are attributed to Rose Hills Memorial Park because they relate to the future addition of the Rose Hills Memorial Park traffic through the project site. Rose Hills Memorial Park traffic would not be traveling through the project site absent the park master planning process and the development of the Proposed Project. In regards to the impact identified at the crossing of the proposed Rose Hills Memorial Park access road and the Schabarum-Skyline Trail, as noted above, the Schabarum-Skyline Trail currently exists and as such is part of the baseline.

#### **Response to Comment B4-6:**

The comment suggests that the DEIR should have considered the potential for park traffic to "cut through" Rose Hills Memorial Park as an alternate to using the park access road.

The likelihood for such cut-through traffic is considered to be relatively low, given that the future park access road would provide better regional access and would provide a shorter route to the park facilities at the top of the hill than would a route through Rose Hills Memorial Park. From a regional access perspective, the entrance to the park access road from Crossroads Parkway South is only 0.15 miles from the SR 60/Crossroads Parkway South interchange. In terms of travel to the recreational facilities at the top of the hill, the distance along the park access road and the loop road from Crossroads Parkway South to the first recreational parking lot is approximately 2.3 miles, as compared to approximately 2.8 miles from Workman Mill Road through Rose Hills Memorial Park.

Furthermore, in previous conversations with the County, Rose Hills Memorial Park has indicated that they intend to have a gated and staffed secondary entry at their property line with the landfill site to ensure that it is exclusively available for use by Rose Hills patrons. This would ensure that no cut-through traffic would occur.

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Finally, to the extent that Schabarum-Skyline Trail users currently trespass on Rose Hills Memorial Park property to access the trail, the need for this will be obviated by development of the park, its access road, and parking facilities at the top of the hill. The development of a programmed park and recreational amenities at the site is expected to reduce the amount of trespass into Rose Hills. Objectives of the project include providing a captivating trail experience within the park and a range of recreational opportunities that would engage park users and ideally curb the need to stray from the programmed areas of the park. In addition, the scenic overlook at Nike Hill is also expected reduce trespass into Rose Hills Memorial Park as it would offer an alternative destination near Rose Hills' water tower for park visitors to view the scenic vistas.

**Response to Comment B4-7:**

The comment suggests that funeral processions are part of the baseline existing conditions, that the Draft PEIR cannot impose mitigation on an unrelated third party, that it is the responsibility of the project to fund a trail overcrossing at the Schabarum-Skyline Trail, and that the mitigation measures imposing restrictions/requirements on Rose Hills Memorial Park are not legally binding.

In regards to funeral processions being part of the baseline existing conditions, the proposed Rose Hills Memorial Park access road through the future park site is not an existing condition. There is no recorded easement for the road, Rose Hills access to the road does not exist, and funeral processions do not currently travel through the park site or across the Schabarum-Skyline Trail. As discussed in the Response to Comment B4-5, the Amended Setback and Easement Agreement provides for a future roadway easement for ingress and egress by Rose Hills Memorial Park through the landfill area but provides that the permanent alignment of the roadway easement is subject to the master planning process for the future park. Phase III of the development of the Proposed Project would include the development of the Rose Hills Memorial Park roadway easement. As such, it is appropriate to consider impacts associated with both park recreational users and Rose Hills Memorial Park's use of the roadway easement when evaluating the potential for impacts of the Proposed Project. The proposed Rose Hills Memorial Park access road is part of the Proposed Project (Draft PEIR page 2-37) and the construction and operation impacts of the road were thus appropriately analyzed in the Draft PEIR<sup>4</sup>. The

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<sup>4</sup> Further support for the position that the proposed Rose Hills Memorial Park access road is part of the Proposed Project and should be evaluated as such in this PEIR can be found in prior documents, including Rose Hills Memorial Park's comments during public scoping for the Puente Hills Landfill Park Master Plan PEIR and the Sanitation Districts' 2001 Puente Hills Landfill EIR. As stated in the email dated February 1, 2016 providing Rose Hills' comments during public scoping for the Puente Hills Landfill Park Master Plan PEIR:

"Rose Hills wants the access road and secondary entry easement into the Memorial Park to be identified on the plans as part of the County of Los Angeles future park Master Plan and noted in the EIR."

As stated on pages 4.4-17 and 4.4-18 in Section 4.4 (Traffic) of the Sanitation Districts of Los Angeles County's *Continued Operation of the Puente Hills Landfill, Volume I: Draft Environmental Impact Report* (June 2001):

"Upon closure of the landfill, the Los Angeles County Parks and Recreation Department could develop portions of the site used for refuse fill for recreational use. The future recreational use of the site is speculative. To encompass a range of uses, the alternative analysis below considers two potential uses. The first potential use is relative high intensity use of the site as a golf course. Another potential use for the project site is as [a] regional nature park ...

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traffic impacts identified in the DEIR as associated with Rose Hills Memorial Park funeral processions along the roadway easement are indeed impacts of the Proposed Project, but are attributed to Rose Hills Memorial Park because they relate to the future addition of the Rose Hills Memorial Park funeral processions through the project site.

In regards to imposing mitigation on an unrelated third party, Rose Hills Memorial Park is not an unrelated third party. As discussed in the Response to Comment B4-5 and in the paragraph above, the Draft PEIR appropriately considered both park recreational users and Rose Hills Memorial Park's use of the roadway easement when evaluating the potential for traffic impacts of the Proposed Project.

In regards to funding a trail crossing at the intersection of the Schabarum-Skyline Trail and the future Rose Hills Memorial Park access road, Mitigation Measure T-3 has been revised to clarify that the crossing could be either grade-separated or at-grade, but in either case shall optimize safety for both trail users and vehicular traffic. The purpose of the crossing is to permit trail users to safely navigate funeral traffic and vehicular traffic. The comment incorrectly attributes the vehicular traffic to both cemetery and park uses, however. The portion of the future Rose Hills Memorial Park access road where it would cross the Schabarum-Skyline Trail is the connection between the park loop road and Rose Hills Memorial Park and is intended for exclusive use by Rose Hills Memorial Park, not by park visitors. Furthermore, as previously stated, the Schabarum-Skyline Trail currently exists. The proposed Rose Hills Memorial Park access road is not and should not be considered to be part of the baseline environment.

This comment also states that the traffic mitigation measures are unenforceable and infeasible. With regards to feasibility of traffic mitigation measure implementation, as the Project proponent, County DPR will be responsible for development and management of the proposed road system, in conjunction with the Sanitation Districts. The Sanitation Districts is required under County permit conditions to grant DPR planning and design authority over future park development and operations (Draft PEIR Section 2.4, page 2-13). As such, operation of the Rose Hills easement is subject to DPR authority and must be consistent with overall park design and operation. The impacts of the Rose Hills easement and secondary site access via Crossroads Parkway have not been assessed in a prior CEQA document and, as with any development project, the construction and operation of such easements are a part of the Proposed Project and as such, the potential impacts of the whole of the project must be considered. For example, the development of high tension power lines or high pressure gas pipelines within easements as part of a new development project would require assessment of the impacts of construction and operation of such facilities on adjacent planned uses. Similarly under these circumstances, the Draft PEIR identifies impacts of operation of the proposed Rose Hills access road on proposed park facilities and future users and identifies mitigation measures where required.

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<sup>4</sup> continued In addition to final use of the site for recreational use, **the Sanitation Districts have provisionally agreed to provide vehicular access to portions of the Rose Hills Memorial Park upon closure of the landfill ...**

The above analysis is provided to be instructive only. The master planning process for final use would include a consideration of all potential impacts. In addition, **the development of final use of the site would require, as necessary, full disclosure of potential environmental impacts and consideration of alternatives pursuant to CEQA.**" [emphasis added]

**Response to Comment B4-8:**

The comment states that Mitigation Measure T-1 of the Draft PEIR constitutes improper deferral of mitigation. CEQA Guidelines Section 15126.4 provides guidance on mitigation in CEQA documents. Section 15126.4(a)(1)(B) states that "Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one way." The courts have also recognized that the formulation of precise mitigation may be infeasible because the exact nature of potential impacts is not known at the time of project approval. Mitigation strategies have been upheld when the Lead Agency commits to developing mitigation details in the future in accordance with specific performance criteria adopted in mitigation measures at the time of project approval (*Sacramento Old City Assn. v. City Council* (1991) 229 Cal. App. 3d 1001, 1028-29). This type of mitigation strategy is not "deferred mitigation" under CEQA.

There are several environmental resources evaluated in the PEIR where sufficient information is known to be able to evaluate the effects of the Proposed Project as potentially significant. These resources include biological resources, cultural resources, tribal cultural resources, paleontological resources, geology and soils, hazards and hazardous materials, public services, and traffic and circulation. However, site-specific and surrounding environment changes over time for the 75-year Puente Hills Landfill Park Master Plan preclude development of detailed mitigation. These changes include landfill settlement, changes in biological resources habitat and presence/absence of sensitive species in specific locations where construction is required, changes in the potential of release of hazards from the landfill with time and location, changes in traffic demand, etc. As such, mitigation measures developed for these future impacts provide timing and performance criteria to ensure that the actual environmental conditions at the time of project development are taken into consideration. The mitigation measures set for are developed at an appropriate level of detail that is currently available. Therefore, mitigation measures provided in the PEIR are not considered "deferred mitigation".

**Response to Comment B4-9:**

This comment states that the Draft PEIR's analysis regarding impacts to water supply for Phases I and II and Future Phases is conclusory and lacks evidentiary support for its conclusions of less than significant. The comment also states that the analysis should be revised to provide evidentiary support that quantifies future use and identify future infrastructure.

On page 3.15-10 of the Draft PEIR, the estimated volume of water required for landscape irrigation is provided. This section states that the Proposed Project would use approximately 182 million gallons of reclaimed water per year or approximately 500,000 gallons per day (gpd). The Draft PEIR also states that at full build out the Proposed Project would demand 0.841 percent of reclaimed water produced daily by the San Jose Creek WRP. As such, the Proposed Project would not be expected to create water capacity problems due to irrigation.

Future infrastructure is identified in the *Grading, Drainage, and Utility Plan Puente Hills Engineering Design Report* prepared for the Proposed Project by PACE (2016) and included in the Draft PEIR as Appendix F. Section 4.2 page 4-1 of Appendix F includes a discussion on the proposed reclaimed water services for the Proposed Project. The Proposed Project's reclaimed

water system is shown on Figure 4.2 of Appendix F. The proposed reclaimed water system would connect to the existing 18 inch pipe main that is being serviced from the 800,000 gallon tank at Nike Hill and includes the installation of laterals to service four new fire hydrants and irrigation lines to be located on the top decks (Figure 4.2 of Appendix F). These infrastructure improvements would occur on the top decks or within existing infrastructure at Nike Hill. As such, no adverse environmental impacts would occur from the construction of the reclaimed water system. Impacts would be less than significant.

Due to the programmatic nature of the Proposed Project, cumulative reclaimed water needs will be reassessed as each of the project components are designed and implemented.

#### **Response to Comment B4-10:**

The Los Angeles County Department of Parks and Recreation (DPR) will continue to work with the Sanitation Districts and the surrounding community as part of the Puente Hills Landfill Park Master Plan and environmental documentation process. However, as noted in the responses to comments B4-1 through B4-9 above, the commenter provides no substantial evidence that project development and operation would “jeopardize” operations at Rose Hills or create any potentially significant effects regarding issues such as visual resources or noise that could credibly be considered as significant impacts, particularly given the sites existing environmental baseline as a recently closed regional landfill.

This comment encourages the County to approve the Low Build Alternative. The commenter also discusses objectives, reasonable range of alternatives, and the environmentally superior alternative. As stated in the comment, the Low Build Alternative meets several of the project objectives as listed in Table 4-12 on page 4-47 of the Draft PEIR; however, the Proposed Project is correctly identified in the EIR as the alternative which most fully meets the project objectives. We note that the Low Build Alternative was specifically designed to reflect input received from certain segments of the community that requested development of a *passive park*. Therefore, given the interest from these segments of the community in supporting passive uses only, the Low Build Alternative excludes active recreation components. Inclusion of such active components would be contrary to the expressed wishes of some members of the community. Therefore, it is simply inaccurate to assert that this alternative is somehow artificially narrow. The Alternatives analysis provides the public and County decision-makers with a reasonable range of options to consider for park development.

A thorough analysis of the Proposed Project, Low Build Alternative, High Build Alternative, and the No Project Alternative was conducted in Section 4 of the Draft PEIR per CEQA Guidelines Section 15126.6(a), (d) and (e)) which state that an EIR must evaluate the comparative merits of the alternatives. The ability of the Low Build Alternative to meet the project objectives is included in Table 4-2 on page 4-3 of the Draft PEIR. The objectives were developed by professional Los Angeles park planners as part of the Master Plan process in coordination with the *County's Comprehensive Parks and Recreation Needs Assessment* and public outreach efforts as summarized below. The nature of the project is a regional park, hence, the objectives were created to meet the goals of DPR for providing a passive recreational resource for the residents of the San Gabriel Valley region.

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The *Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment* identified where parks are most needed based on five metrics:

1. Acres of park per 1,000 people
2. Park access
3. Park pressure, or how much park land is available to residents in the area around the park
4. Available park amenities
5. Condition of park amenities and infrastructure

This analysis was conducted for both local and regional parks. In general, park pressure countywide is high at the County's regional parks, as they offer fewer than 3.3 acres of regional parkland per 1,000 people. The Proposed Project would meet the diverse needs of Los Angeles County and would provide enhanced active and passive park and recreation activities for all users. The 25-mile service radius of the Proposed Project includes two of the fastest growing regions in the state: the Los Angeles metropolitan area and the Inland Empire. The park would be located in an area of historically underserved minority populations. The population within five miles of the proposed park is 70 percent Hispanic, 19 percent Asian, and 9 percent white. The age profile is fairly even surrounding the park, with no one or two age groups dominating. The Proposed Project has been planned for recreational activities that support all age groups equally from young children to seniors.

Coordination between multiple agencies, policy makers, experts, communities, and local and regional stakeholders, including Rose Hills Memorial Park, was conducted as part of the park master plan process. Creation of the initial vision for the park was reliant on the early outreach efforts to these groups. Over a six-month period in late 2015 and early 2016, the County sought and documented the public's needs and interests through community meetings and other means in order to shape the initial park vision. Six distinct park components emerged from this process that helped form the twelve (12) project objectives:

1. Provide connections to nature
2. Provide ways for people to be healthy and active
3. Provide active sports facilities
4. Provide access
5. Alleviate pressures on the existing Puente Hills trails
6. Provide gateways to environmental stewardship

Alternative plan development sought diverse opinions to form three multi-layered, community driven designs. The main themes that emerged from the site analysis and the community/stakeholder visioning process were combined into three alternative park development concepts: Ecology, Recreate, and Upcycle. Results of public voting clearly selected Ecology as the main theme. However, family recreation and fitness dominated the selection of recreational elements that were chosen for the new park. The final park concept (Proposed Project) is an adaptation of the original Ecology concept, but retains aspects of the other themes as each design proposes unique solutions that can be transferred over to the Ecology theme.

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The master plan process helped inform the alternatives selection process in the EIR by providing three concept plans that were vetted with the community and DPR. As described above, the Proposed Project is the Ecology theme with selected elements from the Recreation and Upcycle themes. In response to comments received during the EIR scoping period, the more passive Ecology and higher use Recreate alternatives were further defined and carried forward for analysis as the Low Build Alternative and the High Build Alternative. As such, no alternatives were rejected; instead they were further developed as part of the EIR.

CEQA requires that an EIR consider a reasonable range of alternatives to a proposed project that can attain most of the basic project goals, but has the potential to reduce or eliminate significant adverse impacts of the proposed project and may be feasibly accomplished in a successful manner, considering the economic, environmental, social, and technological factors involved. Both the Low Build and High Build Alternatives were deemed feasible and reasonable alternatives to the Proposed Project and were fully analyzed as part of the Draft PEIR.

CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify the environmentally superior alternative. The Draft PEIR determined that the No Project Alternative would be the environmentally superior alternative because it would avoid all impacts associated with the Proposed Project. However, the No Project Alternative would not meet any of the project objectives. According to the CEQA Guidelines, if the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives. All build alternatives (Proposed Project, Low Build, and High Build) would have impacts that are less than significant or less than significant with mitigation, with the exception of climate change impacts. For all build alternatives, greenhouse gas emissions would be significant and unavoidable. Therefore, the Proposed Project was identified as the environmentally superior alternative in the Draft PEIR because no other alternatives would avoid the significant, unmitigable impact to climate change.

**Response to Comment B4-11:**

Please refer to the responses to comments B4-1 through B4-10 above and Section 1.3, Recirculation Determination, of this Final PEIR. None of the standards for recirculation of the Draft PEIR have been met (CEQA Guidelines §15088.5(a)).

As stated in the comment, the Puente Hills Landfill Park Master Plan is a long term planning process. Section 1.1, Purpose and Use of the PEIR, of the Draft PEIR, discusses that full implementation of the Master Plan would take approximately 75 years. Due the site constraints and phasing of the Proposed Project, the PEIR for the Master Plan is a combined Project and Program EIR.

A Project EIR examines the environmental effects of a specific development project, while a Program EIR is defined as an EIR “which may be prepared on a series of actions that can be characterized as one large project and are related either geographically, as logical parts in the chain of contemplated actions, in connection with issuance of rules, regulations, plans or other general criteria to govern the conduct of a continuing program...” (CEQA Guidelines §15168).

Full implementation of the Master Plan would take approximately 75 years. Sufficient detail is known about the projects to be implemented at the beginning of the Master Plan timeline (e.g.,

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20-year horizon) so that these projects can be discussed in detail at the Project EIR level. These include the Phase I and Phase II projects (years 1 through 20) as described in Section 2.8.1 and 2.8.2 of the Draft PEIR. No further CEQA documentation is anticipated for these projects. However, details of projects that would be implemented in the later stages of Phases III through VI (years 21 through 75) become less certain. These projects are discussed at the Program EIR level.

Under CEQA, these future projects may rely on the Program EIR as the base environmental document for environmental review. Prior to implementation, when greater detail is known, these subsequent projects (Phases III through VI) must go through another CEQA review process. They will be examined in light of the Program EIR to determine whether an additional environmental document must be prepared. If the Lead Agency finds that the subsequent activity would not result in new effects or require new mitigation measures, the Lead Agency can approve the activity as being within the scope of the project covered by the Program EIR and no new environmental document would be required (CEQA Guidelines §15168). Otherwise, subsequent environmental documentation must be prepared. If subsequent documentation is prepared, the environmental analyses would be tiered from the Program EIR by incorporating by reference its general discussions and the analysis of cumulative impacts. Subsequent environmental documents would be focused on project- and site-specific impacts.

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**TABLE B4-1  
COMPARISON OF WEEKDAY VERSUS  
WEEKEND TRAFFIC VOLUMES**

Location	Daily					Highest Peak Hour				
	Weekday (Tue-Thr)	Saturday	Sunday	% Sat of Weekday	% Sun of Weekday	Weekday (Tue-Thr)	Saturday	Sunday	% Sat of Weekday	% Sun of Weekday
Crossroads Pkwy South between SR-60 EB Ramps & Puente Hills Landfill Access Rd	12,672	8,392	-	66%	-	1,080	747	-	69%	-
Workman Mill Rd e/o Peck Rd	11,439	6,955	-	61%	-	1,079	605	-	56%	-
Peck Rd n/o Workman Mill Rd	20,369	15,185	-	75%	-	1,807	1,555	-	86%	-
Workman Mill Rd e/o Crossroads Parkway South	16,342	7,328	4,902	45%	30%	1,330	708	478	53%	36%
Workman Mill Road n/o Mission Mill Rd	34,342	18,412	13,126	54%	38%	3,279	1,656	1,147	51%	35%
Average	19,033	11,254	9,014	59%	36%	1,715	1,054	813	61%	35%

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**Letter B5(A) - Save Our Community**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); ["Jan Sandaren"](#); [Alfredo Aquino](#)  
**Subject:** FW: Comments on the Puente Hills Park DEIR  
**Date:** Monday, August 08, 2016 2:26:37 PM  
**Attachments:** [Comments on DEIR Introduction.doc](#)  
[Comments on 2.0 Project description.doc](#)

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Hi Freddie,

I received comments from James Flournoy of Save Our Community.  
He has submitted comments for each chapter in three emails.  
This is 1/3.

JULIE YOM, AICP  
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*Please note that our offices are closed on Fridays.*

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**From:** James Flournoy Secretary [mailto:[saveourcommunityinc@live.com](mailto:saveourcommunityinc@live.com)]  
**Sent:** Monday, August 08, 2016 2:01 PM  
**To:** Julie Yom <[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)>  
**Cc:** [jlicari2013@gmail.com](mailto:jlicari2013@gmail.com); [mhugheshh@aol.com](mailto:mhugheshh@aol.com)  
**Subject:** Comments on the Puente Hills Park DEIR

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Comments on Introduction

The PEIR for the Puente Hills Landfill Park Master Plan (Master Plan) is a combined Project and Program EIR

**The DEIR's Analysis of Impacts is Inadequate**

The California Environmental Quality Act (CEQA) serves two basic, interrelated functions: ensuring environmental protection and encouraging governmental transparency. (*Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal. 3d 553, 564.) CEQA requires full disclosure of a project's significant environmental effects so that decision-makers and the public are informed of these consequences before the project is approved, to ensure that government officials are held accountable for these consequences. (*Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.)

By failing to adequately disclose, analyze, and mitigate many of the Project's significant adverse environmental impacts, the DEIR for the Project fails to meet either of CEQA's important functions.

**B5(A)-1**

The Geotechnical Study is of the Scoping or Initial level, see consultants Scope of Work, it is insufficient as a Program EIR and totally insufficient as a Project I and II EIR as it cannot be determined if the project is feasible.

Without re-circulation of this DEIR Supplemental Project EIRS will be required.

Sufficient detail is known about the projects to be implemented at the beginning of the Master Plan timeline (e.g., 20-year horizon) so that these projects can be discussed in detail at the Project EIR level. These include the Phase I and Phase II projects (years 1 through 20) as described in Section

Comment: Page 1-1 If sufficient detail is known about the projects then geotechnical investigations must be made instead of the literature review level report provided.

**B5(A)-2**

**Pg 1-4 Potential Hazards**

♦ Geology/Soils

It is not permissible under CEQA to kick the can down the road when potential hazards have been identified

**The DEIR Includes Improperly Deferred Mitigation.**

Structures that would be built for the Project have not yet been designed, and no enforceable design standards or processes have been incorporated to ensure the results described in the DEIR. e.g. ( [colors, height, placement of buildings shall be submitted for future review]., Geotechnical)

This results in impermissibly deferred analysis and deferred mitigation that violates CEQA. These unenforceable promises underlie the DEIR's conclusions of no significant Geotechnical impacts, rendering the conclusions unsupportable. (

**B5(A)-3**

**Table 1-1. Anticipated Agency Approvals and Reviews**

**BOS Seismic Hazards Mapping Act and Peer Review  
San District Fire Hazard removal and re-vegetaiton plan**

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<p><b>San District</b> <b>San District Fire Hazard removal and re-vegetaiton plan</b></p> <p><b>Los Angeles County Department of Public Works (DPW- GMED )</b> Peer Review of the Geotechnical and Grading Plans, Peer Review of the Seismic Hazard Mapping Act Report</p> <p>Regional Water Quality Control Board (RWQCB), Los Angeles Region <b>Approval of Stormwater Recycle/ Reuse Plan</b></p>	<p><b>B5(A)-3 Cont.</b></p>
<p><b>The DEIR Fails To Analyze and Adequately Mitigate Nightlighting Impacts.</b> The Project site in its current open space condition does not produce any nighttime lighting or glare, but would with Project implementation. This is a significant adverse impact under the threshold</p> <p>Nighttime lighting might discourage use of the site for wildlife passage, nesting, etc/ but contains no real analysis of impacts to biological resourcesor targeted mitigation to reduce this likely significant impact.</p> <p>TheDEIR must be recirculated with enforceable and concrete mitigation measures to eliminate nighttime lighting and glare that will be properly vetted by the public and the decision-makers.</p>	<p><b>B5(A)-4</b></p>
<p><b>The DEIR's Analysis and Mitigation of Air Quality Impacts is Inadequate.</b> <b>1. The DEIR Should Analyze Construction-related Toxic Air Contaminants Impacts.</b> The DEIR fails to analyze the potential toxic air contaminants (TACs) impacts associated with construction. The Office of Environmental Health and HazardAssessment, states "Exposure from projects lasting more than 6 months should be evaluated for the duration of the project." (See OEHA, Air Toxics Hot Spots Program Risk Assessment Guidelines, <a href="http://oehha.ca.gov/media/downloads/cmr/2015guidancemanual.pdf">http://oehha.ca.gov/media/downloads/cmr/2015guidancemanual.pdf</a>, incorporated by reference.)</p> <p>It is also unclear whether the DEIR's analysis of construction-related emissions includes analysis of the haul trips that would be required for the export and import of fill to the Project site. The localized impacts must be assessed for the many sensitive receptors living along haul routes for the Project.</p>	<p><b>B5(A)-5</b></p>
<p><b>2. The DEIR Includes Inadequate Mitigation for Significant Air Quality Impacts.</b> The Project would result in significant and unavoidable localized construction PM10 and PM2.5 emissions on sensitive receptors. The Project would also have significant daily construction NOx emissions prior to the DEIR's inclusion of emission</p>	<p><b>B5(A) -6</b></p>

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reductions for mitigation measures.

In order to rely on the mitigation measures to reduce the construction NO<sub>x</sub> emissions to a less than significant level, the DEIR must ensure those measures are fully enforceable. (CEQA Guidelines 15126.4(a)(2).) Mitigation measures are not fully enforceable. They must provide that the construction contractor will use equipment that meets Tier 4 emissions standards. The qualifier that this requirement as only applying “where available.” is not acceptable.

This undefined term makes the mitigation measure less than fully enforceable; the construction contractor can simply claim such equipment was not available and its use would not be required.

The DEIR must require Tier 4 equipment without qualification.

SEE CAL EPA-ARB guidelines

Further, additional measures should be included to mitigate construction PM<sub>10</sub> and PM<sub>2.5</sub> emissions. The DEIR focus only on the equipment being used for the Project. The Project includes the removal of substantial amounts of vegetation and massive amounts of grading, which could result in significant dust impacts.

Dust control measures must also be included to reduce the significant particulate matter impacts on the surrounding community and sensitive receptors including plants and animals, both to their health and the nuisance and habitat impacts of dust covering .

**The DEIR Fails to Adequately Analyze and Mitigate Biological Resources Impacts.**

**The Sanitation District Property has slopes facing in every direction.**

**The Project site is also adjacent to TWO SEA's and the Habitat Authority**

**Due to its proximity to preserved open space, the Project site is rich in wildlife.**

**In addition Rose Hills mule deer, and coyotes many others commonly traverse the site between lowland and upland foraging grounds, the Project site provides nesting, roosting, or foraging habitat for 10 other wildlife species of special concern, including the California gnatcatcher, big free-tailed bat, San Diego desert woodrat, western mastiff bat, western yellow bat, monarch butterfly, California legless lizard, and coast horned lizard and nesting habitat for the rare coastal cactus wren.**

The site is designated as sensitive or locally important natural communities by the California Department of Fish and Wildlife (CDFW).

These communities include coast prickly pear scrub, coast live oak woodland, purple needle grass grassland, blue elderberry stands, and California walnut woodland. Many sensitive plant species may grow on the Project site, or should.

Generally, the DEIR's analysis of biological impacts lacks any specificity about how the Project could affect the site's important biological resources.

the DEIR does not even provide population information for species confirmed onsite.

**B5(A)-6 Cont.**

**B5(A)-7**

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Instead, the DEIR merely claims that mitigation measures will mitigate all potential (and largely undisclosed) impacts below a threshold of significance.

CEQA requires disclosure of a Project's likely significant environmental impacts in an EIR, even if those impacts may be fully mitigated. (See, e.g., *Lotus v. California Dept. Transportation* (2014) 223 Cal.App.4th 645.)

Moreover, the formulation of many of these mitigation measures is deferred until after Project approval, (until grading) and they will purportedly be based on studies conducted after Project approval, (before grading) both violations of CEQA.

Endangered plant species are affected by more than drainage – changes in light and shadows, sedimentation, dust, potentially toxic constituents contained in runoff, and invasive species that accompany grading and development could all adversely impact the species of special concern.

Any adverse impact to known individuals of an endangered species or to the potential for recovery of an endangered species is significant.  
The mitigation measures for protecting special status plant species are inadequate.

The biggest problem with the mitigation measures, however, is their provision for the design of a deferred Mitigation Plan.

When mitigation is deferred, the public and decision makers are deprived of the opportunity to evaluate its effectiveness or desirability prior to project approval. (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 92 [EIR inadequate when mitigation depends “upon management plans that have not yet been formulated, and have not been subject to analysis and review within the EIR.”]).

Deferred mitigation violates CEQA. (*Endangered Habitats League v County of Orange* (2005) 131 Cal. App. 4<sup>th</sup> 777, 793-94; Guidelines Section 15126.4(a)(1)(B).)

The formulation of concrete and enforceable mitigation measures cannot be deferred without the implementation of specific performance standards.

CDFW has expressly disapproved of the practice of “off-site preservation”, restoration, enhancement, or transplantation, stating, “The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.”

The DEIR lacks substantial evidence for its conclusion of insignificance.

In any case, the remaining significant and unavoidable impact means that the County will have to prepare a Statement of Overriding Considerations for the Project.

This statement will have to find:

- (1) no alternatives or mitigation measures were available to avoid this impact; and

**B5(A)-7 Cont.**

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(2) that the Project's benefits outweigh its significant environmental impacts. (CEQA Guidelines section 15093.) These findings will have to be supported by substantial evidence, but they have not and cannot be.

**B5(A)-7  
Cont.**

**The DEIR Includes Conflicting Analysis of and Ineffective Mitigation for Impacts to Sensitive Plant Communities.**

**Considering that the California coastal cactus wren lives almost exclusively in coast prickly pear scrub, and that coast prickly pear scrub provides unparalleled fire protection, decision-makers must be informed as to the amount of coast prickly pear scrub that will actually be destroyed by the Project.**

This discrepancy must be corrected, and the DEIR must be recirculated.

The DEIR does not quantify the Project's temporary impacts, although the DEIR text admits, "temporary impacts would also result from equipment and soil stockpiling on-site, accommodations for construction vehicle access, and the introduction of invasive vegetation."

CEQA requires the disclosure, analysis, and mitigation of significant environmental impacts, even if they are temporary. (*City of Arcadia v. State Water Resources Control Bd.* (2006) 135 Cal.App.4th 1392, 1425.)

These impacts must be quantified, and supportable methodology for determining why impacts will only be temporary must be set forth in a recirculated DEIR.

Section concludes With implementation of Mitigation Measures temporary and permanent impacts would be less than significant."

These conclusions lack substantial evidence, as Mitigation Measures are vague and unenforceable. CEQA requires mitigation measures to be concrete and enforceable. (Pub. Res. Code section 21081.6(b); *Lincoln Place Tenants Ass'n v. City of Los Angeles* (2007) 155 Cal.App.4th 425, 445).

A Restoration Plan must "identify success criteria for each habitat type and develop monitoring measures," but this, too, is impermissibly deferred.

The applicant MUST to submit a Restoration Plan to the County for the revegetation of areas that will be temporarily impacted by Project grading and construction., this mitigation measure, which consists of submitting a future Restoration Plan, is impermissibly deferred.

The DEIR fails to disclose the acreage of temporary construction impacts. This makes it difficult to ascertain whether revegetation is practical.

One important function of an EIR is to permit decision makers and the public to determine the efficacy of mitigation. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645.)

**B5(A)-8**

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A Mitigation Measure Must provide for a Tree Mitigation Plan. The EIR Plan is deferred mitigation, without any enforceable performance standards for the retention of onsite trees. A Tree revegetation plan must be provided

**B5(A)-8  
Cont.**

**The DEIR Fails to Adequately Analyze Impacts to Sensitive Wildlife Species.**

**The DEIR's analysis of potential impacts to sensitive wildlife species is woefully inadequate.**

Many species of sensitive wildlife have been determined to have a potential to occur on the project site.

The DEIR provides:...

Impacts to these species, if present, would result from construction vehicles and workers crushing or removing nests, burrows, or dens. In addition, noise can cause wildlife to disperse or to change behavior. Trash and debris can attract predators that kill wildlife, including sensitive wildlife on the project site.

Construction and vehicle maintenance... activities can also contaminate native vegetation and soil, resulting in habitat loss.

The species that may be impacted by the Project are not even listed in this portion of the DEIR. One has to turn many pages and sort through a multiple-page chart to determine which animals are likely referenced THERE ARE NO PAGE NUMBERS

At its most basic level, CEQA requires disclosure, analysis, and avoidance or mitigation of a Project's potentially significant impacts on the environment, including impacts on sensitive wildlife species.

For species of special concern or endangered species, this should include which species might be affected, their abundance in the area, and exactly how the Project might adversely impact their breeding, foraging, or population.

**B5(A)-9**

The DEIR fails to clearly identify which wildlife species could be affected and how they could be affected. Focused surveys were not conducted for the San Diego desert woodrat, Western mastiff bat, or Western yellow bat, CDFW species of special concern with suitable habitat onsite. The San Diego desert woodrat and the dusky-footed woodrat is known to occur in the area,

As a result of the DEIR's failures, the public and decisionmakers cannot properly weigh the environmental consequences of the Project. One of CEQA's bedrock principles is that environmental review derives its vitality from public participation. (*Ocean View Estates Homeowners Ass'n, Inc. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 400.) Without this required information, the public is also unable to determine the efficacy of mitigation measures, as required.

The DEIR's discussion of the Project's potential adverse impacts to the cactus wren and its habitat is insufficient to support the conclusion that the Project would not adversely impact this

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species. Focused surveys were not done for the cactus wren, and the DEIR contains no information about local or onsite populations.

Focused surveys must be conducted, and current population data must be provided, along with detailed predictions about the Project's impact on this vanishing species, in a recirculated DEIR.

Mitigation Measures state that sensitive resources at the Project site shall be staked, flagged, or signed for their protection, and that construction-related activities within the sensitive areas shall be avoided. Unfortunately, the measure does not define "sensitive resources." It is clear that the DEIR does not define cactus wren habitat as "sensitive resources" for the purpose of Mitigation. Does the project propose to flag or mark individual cactus wrens? If so, how? A minimum buffer size that applies to a cactus wren must be provided. Protection must be provided to foraging birds and/or foraging habitat. Mitigation that permits encroachment into the buffer "at the discretion of a qualified biologist." is neither concrete nor enforceable.

The DEIR also lacks any discussion of impacts to cactus wren populations from the Project's un-quantified "temporary" impacts to sensitive plant communities, due to edge effects, due to habitat fragmentation, or the spread of invasive plant, pest, and pet species.

**B5(A)-9 Cont.**

**Impacts to Wildlife Corridors Would be Significant.**

The U.S. Fish and Wildlife Service (USFWS) submitted comments on the NOP for the Project that describe the site's importance as a wildlife corridor.

The site "may play an important role in supporting mammal species such as mountain lion, mule deer, bobcat, and coyote, and that require large home ranges." USFWS also recognized, the project site, also serve as a link between California gnatcatcher populations in the Chino/Puente Hills, Montebello Hills and relatively isolated populations at the northwestern extent of the range in the San Gabriel and Santa Susana Mountains."

The DEIR also recognizes that increased human activity, noise and lighting would discourage movement of wildlife across the site. The DEIR notes the wildlife hazard presented by increased traffic

Even so, the DEIR ultimately concludes that the Project would not have a significant adverse impact on wildlife corridors, conclusion lacks evidentiary support.

**B5(A)-10**

**The DEIR Fails to Adequately Analyze and Mitigate Impacts to Cultural Resource.**

**1. Impacts to Tribal Cultural Resources Must Be Assessed.**

In 2014, the California legislature approved Assembly Bill 52. AB 52 creates a new category of environmental resources that must be considered under the California Environmental Quality Act: "tribal cultural resources." The legislation imposes new requirements for consultation regarding projects that may affect a tribal cultural resource, includes a broad definition of what may be considered to be a tribal cultural resource, and includes a list of recommended mitigation measures.

**B5(A)-11**

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CEQA defines tribal cultural resources as “sites, features, places cultural landscapes, sacred places and objects with cultural value to a California Native American tribe” that have been determined to be significant. (Public Resources Code §21074.) It is important to note that tribal cultural resources are not limited to archeological artifacts, but also include landscapes and places of importance to tribes. The Anza expedition camped and hunted deer in the project area.

**B5(A)-11 Cont.**

**The Project’s Fire Hazard Impacts Remain Significant.**

The Project site is located in an area of extreme fire risk, a risk that continues to increase as the five-year drought continues and as climate change reduces precipitation in Southern California.

Fire season in Southern California now begins in May and lasts through the fall Santa Ana winds.

Since mid-June of *this year*, three fires have consumed over 120,000 acres of California’s National Forest, as well as hundreds home homeslocated nearby.

(See, <http://inciweb.nwcg.gov/incident/4888/>, herein incorporated by reference [Soberanes Fire, 33, 668 acres of Los Padres National Forest]; <http://inciweb.nwcg.gov/incident/4806/> [Erskine Fire, 48,019 acres, including Sequoia National Forest]; <http://inciweb.nwcg.gov/incident/4878/> [Sand Fire, 38,873 acres of Angeles National Forest].)

Consider also the Great Berkeley and Pacific Palisades Fires, Consider Santa Ana Winds. Consider fire fighting water being not available after a major earthquake.

The Project site’s steep terrain and limited access roads at the San Districts self inflicted wildland urban interface present a significant fire risk to future Project Visitors, and significant biological resources.

The DEIR fails to adequately disclose and mitigate or avoid these risks.

As the DEIR for the Project was released, the Fish Fire and the Reservoir Fire merged to form the 5,399-acre San Gabriel Fire Complex.

(<http://inciweb.nwcg.gov/incident/4801/>, herein incorporated by reference).

The fires began on June 20, 2016 in areas of chaparral and invasive, nonnative grassland a few miles across the San Gabriel Valley from the Project site, and burned thousands of acres in the Angeles National Forest within one day due to wind, dry conditions, and the steep, canyon terrain characteristic of the area. (*Ibid.*) At the height of the fires, 1,376 homes were evacuated. (*Ibid.*) The cause of the Fish Fire is still unknown.

As this letter is being written, the Sand Fire has burned nearly 40,000 acres in another portion of the Angeles National Forest and forced the evacuation of 10,000 households. (<http://inciweb.nwcg.gov/incident/4878/>, herein incorporated by reference.)

The fire consumed 10,000 acres per day after ignition on July 22, 2016.

One fatality has already been reported, and 18 structures were burned.

(<http://www.dailynews.com/general-news/20160724/sand-fire-prompts-waves-ofevacuations-in-acton-santa-clarita-area>, herein incorporated by reference.)

**B5(A)-12**

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Over 3,000 fire fighters were required to contain the perimeter.  
The Sand and San Gabriel Complex  
fires demonstrate the inherent dangers of locating development above the steep  
canyons and the Sanitation Districts Eucalyptus Forest.

The DEIR acknowledges that the California Department of Forestry and Fire  
Protection (CAL FIRE) has identified the Project site as a “Very High Fire Hazard  
Severity Zone.” “Classification of a zone as moderate, high or very  
high fire hazard is based on a combination of how a fire will behave and the probability  
of flames and embers threatening buildings.”  
(See, [http://www.fire.ca.gov/fire\\_prevention/downloads/Doc\\_7\\_FAQs\\_ALL.pdf](http://www.fire.ca.gov/fire_prevention/downloads/Doc_7_FAQs_ALL.pdf),  
herein incorporated by reference.) The Project site is located in – and surrounded by – the  
highest category of risk.

Despite the risks of introducing visitors and their vehicles (a common cause of  
wildland fires) into a very high fire zone, the DEIR concludes that the Project will not  
have a significant impact as a result of compliance with applicable fire codes, road  
widths, and hydrant spacing. While these measures may provide  
some reduction in fire risk, the risk of ignition or spread is not eliminated.  
Failure of the water distribution system is problematical given the high seismic hazard.

The Project’s distance from fire stations, private gates, and steep roads will substantially  
increase the response time. This is critically important, given how quickly a fire can spread  
from ignition to thousands of acres.

The DEIR also fails to analyze the Project’s single access point and the ability of  
residents to evacuate simultaneously with fire department response.  
Evacuations during the Sand Fire were slowed as escaping residents and firefighters shared  
narrow, winding, roads.  
([http://www.latimes.com/la-sand-fire-live-updates-sand-fire-won-tscare-  
residents-into-1469473202-htmlstory.html](http://www.latimes.com/la-sand-fire-live-updates-sand-fire-won-tscare-residents-into-1469473202-htmlstory.html) [evacuation that would normally have  
taken “a few minutes” took over 30 minutes as residents were required to pull over to  
allow fire trucks to pass].)  
The DEIR’s conclusion of no significance lacks substantial evidence.

The DEIR’s omission of the Project’s planned vegetation modification is a failure to disclose  
that prejudices informed decisionmaking, in violation of CEQA.  
Removal, mowing, clearance, thinning, and trimming of vegetation will have impacts to  
affected plant species, sensitive plant communities, and wildlife species that forage, nest, or  
roost in the affected vegetation.

Additionally, any removal of prickly pear cactus scrub will actually *increase* fire risk at the  
Project site.  
These impacts must be disclosed, analyzed, and avoided or mitigated in a revised and  
recirculated DEIR.

**B5(A)-12 Cont.**

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**Geotechnical Impacts Require Further Analysis.**

Experts have submitted detailed comments regarding, the inadequacies of the DEIR's investigation of seismic and geotechnical impacts.

**1. Slope Stability Impacts Must Be Fully Analyzed and Mitigated.**

The Project site has been identified as having a high potential for landslides, and earthquake induced landslides have the potential to occur on large portions of the site.

Due to these potentially significant impacts, the County requires a dynamic slope stability evaluation for this project.

The need for such an analysis is needed to develop adequate mitigation measures for the Project.

A program for maintenance of slopes MUST be developed..." This is improperly deferred mitigation.

**B5(A)-13 Cont.**

**Significant Noise Impacts Must Be Fully Addressed.**

**1. The DEIR Lacks Adequate Analysis of Noise Impacts.**

The Project would result in years of noise levels that are in violation of Codes. the DEIR includes only limited analysis of noise impacts on sensitive receptors with very little site specific evaluation.

The DEIR fails to analyze noise levels at the SEA's, Habitat Authority.

or on existing hiking trails near the Project site.

Grading and Construction noise could have serious impacts on sensitive wildlife, could have safety impacts due to startling horses on equestrian trails, and could make hiking trails nearly unusable for the duration of construction or longer

This lack of detailed and site specific analysis leaves many questions regarding the noise impacts unanswered:

Would the many haul trips required by this Project result in significant construction noise impacts spreading farther from the Project?

Does the noise analysis analyze whether sounds would be reflected on the steep slopes of the Project site, amplifying the noise levels experienced by the surrounding community?

Would the Project require extensive jack hammering into the shallow rock layers at the site?

**B5(A)-14**

**The DEIR Fails to Consider Mitigation Measures for Significant Construction Vibration Impacts on Sensitive Receptors**

The DEIR acknowledges that the Project will have significant ground vibration impact. Mitigation measures that would reduce or eliminate this impact, Must be considered.

Would heavy vibratory rollers be utilized?

**B5(A)-15**

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The DEIR also fails to consider mitigation measures that would additionally reduce the significant construction noise and Vibration impacts that would be imposed upon the surrounding community and sensitive receptors. The use of soundproofing blankets on construction fencing and other means of absorbing sound and vibration from the construction site must be considered.

**B5(A)-15 Cont.**

**The DEIR's Traffic Analysis is Inaccurate and Incomplete.**

**The DEIR does not appear to have considered the traffic impacts** associated with gated access to the single road. Gated access can result in traffic backups and increased delays. The already significant traffic impacts could be even worse than shown if delays from gated access were included. Traffic jams for funeral processions and during emergencies **MUST** be considered. Evacuation in the Case of Fire must be considered.

**B5(A)-16**

**Initial Study**

**It does not appear that comments to the Scoping have been adequately considered.**

The purpose of the initial study is to provide the lead agency with adequate information regarding a project to determine the appropriate environmental review document and "documentation of the factual basis for the finding in a negative declaration that a project will not have a significant effect on the environment." (*Ctr. for Sierra Nevada Conservation v. County of El Dorado* (2012) 202 Cal. App. 4th 1156, 1170, citations omitted.)  
There must be a basis within the record to support the conclusions reached by the initial study. (*Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170, 1201.)

**B5(A)-17**

**The Project Should Be Required to Implement Water Conserving Measures. Including Recycle/ Reuse of Stormwater and Graywater**

**The DEIR provides outdated water supply information from 2009-2010, prior to** the current massive drought. Updated information regarding available water supplies is necessary to assess the true impacts, particularly given that water shortages are common in the San Gabriel Water Company Service Area, and to comply with the state Water Conservation Act.

**B5(A)-18**

The Project should be required to recycle and reuse storm water runoff grey water for landscaping. This could be achieved by retaining runoff onsite.

**Less Impactful Alternatives Must Be Considered and Adopted.**

The alternatives analysis is the "core of the EIR." (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal 3d 553, 564.)  
"Under CEQA, the public agency bears the burden of affirmatively demonstrating that...the agency's approval of the proposed project followed meaningful consideration of alternatives and mitigation measures." (*Mountain Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.4th 105, 134.)

**B5(A)-19**

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An EIR is required to analyze a range of alternatives that would “would avoid or substantially lessen any of the significant effects of the project.”  
(CEQA Guidelines §15126.6(a).)

The reasonableness of alternatives is considered in light of the nature of the project, the nature and extent of the project’s impacts, and other material facts.  
(*San Bernardino Valley Audubon Society v. County of San Bernardino* (1984) 155 Cal.App.3d 738,750.)

An EIR is required to consider those alternatives that will “attain *most* of the basic objectives” while avoiding or substantially reducing the environmental impacts of the project.  
(Guidelines, § 15126.6(a), emphasis added.)

Alternatives are not required to meet all project objectives, and in reality it “is virtually a given that the alternatives to a project will not attain all of the project’s objectives.”  
(*Watsonville Pilots Ass’n v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 108

CEQA prohibits approval of projects with significant adverse environmental impacts if there are feasible alternatives or mitigation measures that would reduce or eliminate those impacts. (Pub. Resources Code § 21002; Guidelines § 15021(a)(2).)

When an agency seeks to approve a project despite the significant impacts the project would have on the environment, the agency must adopt a statement of overriding considerations. (Pub. Resources Code § 21081.)

A statement of overriding considerations must include specific findings, supported by substantial evidence, that:

“There is no feasible way to lessen or avoid the significant effect...”  
(Guidelines §§15043, 15093(b).)

A less damaging feasible alternative or mitigation measure *must* be adopted by the lead agency unless the lead agency can demonstrate that the mitigation is “truly infeasible.” (*City of Marina v. Board of Trustees of the California State University* (2006) 39 Cal. 4th 341, 368; see also Pub. Res. Code § 21002.)

Under CEQA,

“The EIR is intended to furnish both the road map and the environmental price tag for a project, so that the decision maker and the public both know, before the journey begins, just where the journey will lead, and how much they-and the environment-will have to give up in order to take that journey.” (*NRDC v. City of Los Angeles* (2002) 103 Cal.App.4th 268, 271.)

The DEIR fails to provide this environmental price tag to the public and to the County’s decision makers.

The DEIR should be revised to include additional analysis – and to include analysis of impacts where analysis is absent –

as well as to include enforceable mitigation measures that will actually reduce the Project’s significant impacts.

It should then be recirculated for the benefit of the community,

**B5(A)-19 Cont.**

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decision makers, and the environment.

**B5(A)-19 Cont.**

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Comments on Section 2.0 Project Description

Table 2-1

Planted nonnative woodland Mature nonnative woodland with eucalyptus  
(approximately 35 to 50 feet in height) an Extreme Fire Hazard- project is not feasible

**B5(A)-20**

Figure 2-3

It appears that there are potential access and/or emergency exit points for ambulatory visitors Via the Canyons  
and at Orange Grove Park and the Water Tanks and the existing trails  
WE can't tell if there are developmental exit trails in Canyons 1,10,11  
Emergency exits must be developed into Rose Hills and Rio Hondo College

**B5(A)  
-21**

2.4 It would appear that re-vegetated slopes could be utilized for park use and habitat

**B5(A)-22**

2.6.2 Project Objectives

**7. Environmental Sustainability - Recycle/ Reuse of StormWater and Gray-water  
Removal of foreign Plants- entire landfill area and replace with natives.**

**B5(A)-23**

Table 2-6

**WE see no reason that many phase III project need to be delayed  
Emergency exits must be done in phase I  
The nursery may be necessary earlier  
Removal of non-native species must begin immediately  
Bridges could be Army portable bridges which could easily be re-leveled as the site settles**

**B5(A)-24**

## **Responses to Letter B5(A) – Save Our Community**

### **Response to Comment B5(A)-1:**

The comment states that the Draft PEIR does not adequately disclose, analyze, and mitigate many of the Project's significant adverse environmental impacts. The Draft PEIR was prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code §§ 21000-21177) and the Guidelines for the Implementation of CEQA (California Administrative Code §§ 15000 et seq.).

### **Response to Comment B5(A)-2:**

This comment states that the geotechnical study is insufficient for the Program EIR and for the Project I and II EIR.

An engineering design report (PACE 2016) and geotechnical feasibility evaluation (Ninyo & Moore 2016) have been developed for the Phase I and II projects to ensure that park features would be constructed to be consistent with County requirements for safety and stability, while still ensuring that park activities would not interfere with landfill maintenance and operations. The geotechnical feasibility evaluation is provided as Appendix E of the Draft PEIR. Detailed analysis of each of the project elements can be found on pages 3.6-12 through 3.6-16 of the Draft PEIR. Mitigation Measure G-1 requires that a qualified geotechnical firm conduct site-specific geotechnical investigations during the design of each project.

CEQA Guidelines Section 15126.4 provides guidance on mitigation in CEQA documents. Section 15126.4(a)(1)(B) states that "Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one way." The courts have also recognized that the formulation of precise mitigation may be infeasible because the exact nature of potential impacts is not known at the time of project approval. Mitigation strategies have been upheld when the Lead Agency commits to developing mitigation details in the future in accordance with specific performance criteria adopted in mitigation measures at the time of project approval (*Sacramento Old City Assn. v. City Council* (1991) 229 Cal. App. 3d 1001, 1028-29). This type of mitigation strategy is not "deferred mitigation" under CEQA.

There are several environmental resources evaluated in the PEIR where sufficient information is known to be able to evaluate the effects of the Proposed Project as potentially significant. These resources include biological resources, cultural resources, tribal cultural resources, paleontological resources, geology and soils, hazards and hazardous materials, public services, and traffic and circulation. However, site-specific and surrounding environment changes over time for the 75-year PHLMP preclude development of detailed mitigation. These changes include landfill settlement, changes in biological resources habitat and presence/absence of sensitive species in specific locations where construction is required, changes in the potential of release of hazards from the landfill with time and location, changes in traffic demand, etc. As such, mitigation measures developed for these future impacts provide timing and performance criteria to ensure that the actual environmental conditions at the time of project development

are taken into consideration. Therefore, mitigation measures provided in the PEIR are not considered “deferred mitigation”.

**Response to Comment B5(A)-3:**

This comment lists suggested approvals and reviews for Table 1-1 on page 1-2 of the Draft PEIR. Fire hazard removal and a revegetation plan for areas outside of the project area would be under the purview of the Sanitation Districts and not the County of Los Angeles or the Proposed Project. Table 1-1 will be revised to add additional Los Angeles County Department of Public Works review as part of Section 4, Errata, of this Final PEIR.

**Response to Comment B5(A)-4:**

This comment states that the Draft PEIR fails to analyze and adequately mitigate night lighting impacts. The commenter is referred to pages 3.2-20 and 3.2-21 of the Aesthetics section of the Draft PEIR for a full analysis of light and glare, including nighttime lighting.

The Proposed Project would be open to the public during daylight hours and no nighttime performances would be allowed to preserve nighttime darkness for wildlife.

The Proposed Project would not include park lighting except for security lighting of the M&O Yard. The Proposed Project would include lighting for parking lots, pedestrian pathways, building entries, and landscaping. Light fixtures would provide increased visibility for security and wayfinding and highlight elements of buildings. No stadium-type lighting is proposed. New lighting associated with the Proposed Project would be required to comply with existing County ordinances governing light pollution and the County of Los Angeles Park Design Guidelines and Standards, as outline in Section 3.2.2 of the Draft PEIR, minimizing light and glare impacts.

Park amenities and structures that include lighting would be designed to ensure that new sources of lighting would not affect surrounding properties. Light fixtures used would have low cutoff angles and be directed downward to minimize light spillover effects on surrounding properties. Light impacts would be less than significant.

**Response to Comment B5(A)-5:**

This comment states that the Draft PEIR should analyze construction related toxic air contaminant impacts. Construction impacts to air quality are discussed in Section 3.3, Air Quality of the Draft PEIR in subsection 3.3.4.2, Criteria Pollutant Analysis. The analysis included off-site emissions from equipment operated on public roads. Further local air quality impact analysis is provided in subsection 3.3.4.4, Exposure of Sensitive Receptors.

**Response to Comment B5(A)-6:**

The comment states that the Draft PEIR includes inadequate mitigation for air quality impacts. The Draft PEIR determined that air quality impacts would be less than significant and no mitigation is required. NO<sub>x</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> emissions would not exceed the South Coast Air Quality Management District significance thresholds. Please refer to Tables 3.3-5 and 3.3-6 of the Draft PEIR.

**Response to Comment B5(A)-7:**

This comment states that the Draft PEIR fails to adequately analyze and mitigate biological resources impacts. The biological resources analysis in Section 3.4 of the Draft PEIR includes a full analysis of the direct and indirect impacts to biological resources and provides mitigation measures to reduce impacts to a less than significant level. Review of the adjacent Significant Ecological Areas (SEAs) and Conceptual SEAs was included as part of the Biological Technical Report (Appendix C, Draft PEIR), and the Draft PEIR.

The comment references nesting habitat for the coastal cactus wren. The literature review and database searches did not identify this species in the project area. The vegetation communities on the site do not support the coastal cactus wren.

Please refer to the response to comment B5(A)-2 which addresses deferred mitigation.

**Response to Comment B5(A)-8:**

This comment states that the Draft PEIR includes conflicting analysis of and ineffective mitigation for impacts to sensitive plant communities. As stated in the response to comment B5(A)-7 above, literature review and database searches did not identify the coastal cactus wren in the project area. The vegetation communities on the site do not support the coastal cactus wren. The Proposed Project would not result in the removal of coast prickly pear scrub.

Section 3.4.4.1, Sensitive Plant and Wildlife Species, of the Draft PEIR (page 3.4-27) includes an impact analysis of the direct and indirect impacts of the Proposed Project on sensitive plant species. Vegetation communities are quantified in Table 3.4-1 on page 3.4-9 of the Draft PEIR.

Mitigation Measure B-8 is included for the preparation of a Landscaping Plan.

Please refer to Section 1.3, Recirculation Determination, of this Final PEIR. The response to comment B5(A)-2 addresses deferred mitigation.

**Response to Comment B5(A)-9:**

The commenter states that the Draft PEIR fails to adequately analyze impacts to sensitive wildlife species. Section 3.4.4.1, Sensitive Plant and Wildlife Species, of the Draft PEIR (page 3.4-27) includes an impact analysis of the direct and indirect impacts of the Proposed Project on sensitive wildlife species (page 3.4-29). Please refer to the response to comment B5(A)-8 above.

**Response to Comment B5(A)-10:**

The comment states that impacts to wildlife corridors would be significant. Please refer to the responses to Letter A8 (United States Fish and Wildlife Service) regarding wildlife corridors and the California gnatcatcher.

**Response to Comment B5(A)-11:**

The comment states that the Draft PEIR fails to adequately analyze and mitigate impacts to tribal cultural resources. Impacts to tribal cultural resources are specifically discussed in subsection 3.5.4.2, Tribal Cultural Resources, starting on page 3.5-14 of the Draft PEIR. Mitigation Measures TCR-1 and TCR-2 would reduce impacts to less than significant.

**Response to Comment B5(A)-12:**

The commenter is concerned with fire hazards and states that the Draft PEIR does not adequately disclose, mitigate, and avoid these risks. A detailed discussion of fire risk and safety can be found in Section 3.8, Hazards and Hazardous Materials, pages 3.8-14 and 3.8-15. In addition, Section 3.12.4.1, Fire and Sheriff Protection of the Draft PEIR, includes an analysis of project impacts on the Los Angeles County Fire Department (LACFD). Mitigation Measure PS-1, requiring a Fire Incident Plan, would reduce impacts to a less than significant level. Figure 3.14-7 of the Draft PEIR shows five main evacuation and emergency access points that could be used by the LACFD. The impact discussion on pages 3.14-53 and 3.14-57 describe the emergency access points and plans.

Given the many demands on the park entry, several ingress and egress road sites at the perimeter of the landfill would serve as emergency access points and shown on Figure 3.14-7 of the Draft PEIR. In the case of a park visitor emergency, first responders from the adjacent municipalities with emergency facilities in response to an emergency/evacuation situation range in distance from three to 13 miles from the park entry. In an emergency, all the bench roads within the landfill area, not open to the public, would be available for emergency vehicle use. Emergency vehicles (in unusual or extreme disaster situations) may be able to access the Puente Hills Material Recovery Facility area located on the former landfill site via the existing gated access road and/or a new internal off-street access road. The County would coordinate with Sanitation Districts and park staff to expedite emergency access. A County Animal Services Coordinator trained in disaster response, animal care, and animal rescue would be available if equestrians and their horses become part of an emergency or evacuation at the Puente Hills Landfill Park.

All counties of California have a local Office of Emergency Services (OES) to identify hazards and to prepare for, respond to, mitigate, and help recover from both large and small local incidents. The Los Angeles County Office of Emergency Management (OEM) is a coordinating agency that brings together local agencies to focus on unified responses to disaster. The existing main entrance off of Crossroads Parkway South and the entrance station area would serve as the primary emergency ingress and egress. Two additional ingress and egress sites on the west and south park boundaries include the Rio Hondo College entrance road and the Rose Hills Memorial Park road network. The most appropriate ingress and egress site would depend on the type and severity of the emergency and subsequent evacuation procedures. Ingress and egress at the street end of Orange Grove and up the Eastern Canyon either at Canyon 4 or Canyon 5 could service park emergencies as a second option if the main entry is blocked by traffic, landslide, fire, or other emergency event requiring evacuation of park users.

If the degree of emergency intensifies to a site wide issue affecting the park and landfill, emergency aid and the County of Los Angeles Disaster Routes have been developed for the

region. Guidance for such an emergency is to be structured to be consistent with the Standardized Emergency Management System (SEMS), the National Incident Management System (NIMS), and all relevant county, State, and Federal laws. Regulatory requirements for specific activities related to Puente Hills Landfill operations remain in effect post-closure. These include: 1) Emergency Action/Fire Prevention Plan (EAP), 2) Spill Prevention, Control, and Countermeasure Plan (SPCC), 3) Hazardous Materials Business Plan, and 4) Storm Water Pollution Prevention Plan (SWPPP) which contains a Liquid Discharge Emergency Response Plan for release of landfill liquids to surface water.

Fire hazard removal and a revegetation plan for areas outside of the project area would be under the purview of the Sanitation Districts and not the County of Los Angeles or the Proposed Project.

As stated in the response to comment B5(A)-7 above, literature review and database searches did not identify the coastal cactus wren in the project area. The vegetation communities on the site do not support the coastal cactus wren. The Proposed Project would not result in the removal of coast prickly pear scrub.

Please refer to Section 1.3, Recirculation Determination, of this Final PEIR.

**Response to Comment B5(A)-13:**

This comment states that the geotechnical impacts require further analysis. Please refer to the response to comment B5(A)-2 above.

**Response to Comment B5(A)-14:**

The comment states that the Draft PEIR lacks adequate analysis of noise impacts. Construction and operational noise impacts to sensitive receptors are discussed starting on page 3.11-18 of the Draft PEIR. The analysis includes off-site and on-site receptors and noise measurements at five different locations (Figure 3.11-1, Draft PEIR). Appendix G of the Draft PEIR includes an operational noise level contours figure (Figure 6) which shows the noise levels for a performance event. Impacts were found to be less than significant. The Proposed Project may require jackhammering. Mitigation Measure N-1 includes the following requirement:

5. Jackhammers, pneumatic equipment and all other portable stationary noise sources shall be shielded and noise shall be directed away from sensitive receptors.

With regard to Proposed Project's construction-related noise, Section 12.08.440, Construction Noise, of the County's Municipal Code discusses the limitations of construction noise. As discussed on Page 3.11-15 of the Draft PEIR, Section 12.08.440(A) of the County's Municipal Code states:

Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 P.M. and 7:00 A.M., or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for

emergency work of public service utilities or by variance issued by the health officer is prohibited.

As discussed in Section 3.11.4.1 of the Draft PEIR (Page 3.11-19), although construction noise associated with the Proposed Project would have a temporary or periodic increase in the ambient noise levels within the project vicinity, construction activities would occur between the hours of 7:00 A.M. and 7:00 P.M. Mondays through Saturdays (excluding federal holidays). Construction activities would therefore be in compliance with the County's Municipal Code regarding construction noise, and it was determined that construction-related noise impacts would be less than significant.

Because no significant construction noise impacts would occur, the County DPR is not required under CEQA to include mitigation measures to avoid or reduce impacts. Nonetheless, the County DPR has agreed to implement Mitigation Measure N-1 (refer to Section 3.11.5 on Page 3.11-26 of the Draft PEIR), which includes measures to further reduce construction noise associated with the Proposed Project.

**Response to Comment B5(A)-15:**

This comment states that the Draft PEIR fails to consider mitigation measures for significant construction vibration impacts to sensitive receptors. Vibration impacts are analyzed on pages 3.11-25 and 3.11-26 of the Draft PEIR. The Draft PEIR determined that vibration impacts would be short-term and would only occur during site grading and construction activities. Temporary vibration levels associated with construction of the Proposed Project would be less than significant.

**Response to Comment B5(A)-16:**

The commenter states that the traffic analysis is inaccurate and incomplete and did not consider gated access on a single road. Please refer to the response to comment B5(A)-12 above for regarding emergency access.

**Response to Comment B5(A)-17:**

This comment states that the scoping comments have not been adequately considered. In accordance with the CEQA Guidelines, the County, as Lead Agency, prepared an Initial Study and Notice of Preparation (NOP) for a PEIR on the Proposed Project. The Initial Study and NOP were distributed for review and comment to the State Clearinghouse and interested parties for a 45-day comment period from December 18, 2015 to February 1, 2016. The scoping period was extended from the CEQA-required 30 days to 45 days to accommodate the holidays. Letters received from agencies and the public during the scoping period were reviewed as part of the preparation of the Draft PEIR.

During the scoping period, a scoping meeting was held on January 27, 2016 at Don Julian Elementary School in the City of La Puente. Comments received at that meeting were also reviewed as part of the preparation of the Draft PEIR.

**Response to Comment B5(A)-18:**

This comment states that the Draft PEIR provides outdated water supply information and that the Proposed Project should be required to implement water conserving measures, including recycling/reusing stormwater and graywater. Water supply is discussed in section 3.15.1.1, Water Supply, on page 3.15-1 of the Draft PEIR. The reuse and recycling of stormwater and/or graywater was considered as part of the Master Plan and options for water conserving measures will continue to be explored as the different phases of the Proposed Project are implemented.

**Response to Comment B5(A)-19:**

This comment states that less impactful alternatives must be considered and adopted. The commenter also discusses objectives, reasonable range of alternatives, the statement of overriding considerations, and recirculation. A thorough analysis of the Proposed Project, Low Build Alternative, High Build Alternative, and the No Project Alternative was conducted in Section 4 of the Draft PEIR per CEQA Guidelines Section 15126.6(a), (d) and (e)) which state that an EIR must evaluate the comparative merits of the alternatives. The objectives and alternatives were developed by professional Los Angeles park planners as part of the Master Plan process in coordination with the *County's Comprehensive Parks and Recreation Needs Assessment* and public outreach efforts as summarized below.

Coordination between multiple agencies, policy makers, experts, communities, and local and regional stakeholders, including Rose Hills Memorial Park, was conducted as part of the park master plan process. Creation of the initial vision for the park was reliant on the early outreach efforts to these groups. Over a six-month period in late 2015 and early 2016, the County sought and documented the public's needs and interests through community meetings and other means in order to shape the initial park vision. Six distinct park components emerged from this process that helped form the twelve (12) project objectives:

1. Provide connections to nature
2. Provide ways for people to be healthy and active
3. Provide active sports facilities
4. Provide access
5. Alleviate pressures on the existing Puente Hills trails
6. Provide gateways to environmental stewardship

Alternative plan development sought diverse opinions to form three multi-layered, community driven designs. The main themes that emerged from the site analysis and the community/stakeholder visioning process were combined into three alternative park development concepts: Ecology, Recreate, and Upcycle. Results of public voting clearly selected Ecology as the main theme. However, family recreation and fitness dominated the selection of recreational elements that were chosen for the new park. The final park concept (Proposed Project) is an adaptation of the original Ecology concept, but retains aspects of the other themes as each design proposes unique solutions that can be transferred over to the Ecology theme.

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The master plan process helped inform the alternatives selection process in the EIR by providing three concept plans that were vetted with the community and DPR. As described above, the Proposed Project is the Ecology theme with selected elements from the Recreation and Upcycle themes. In response to comments received during the EIR scoping period, the more passive Ecology and higher use Recreate alternatives were further defined and carried forward for analysis as the Low Build Alternative and the High Build Alternative. As such, no alternatives were rejected; instead they were further developed as part of the EIR.

CEQA requires that an EIR consider a reasonable range of alternatives to a proposed project that can attain most of the basic project goals, but has the potential to reduce or eliminate significant adverse impacts of the proposed project and may be feasibly accomplished in a successful manner, considering the economic, environmental, social, and technological factors involved. Both the Low Build and High Build Alternatives were deemed feasible and reasonable alternatives to the Proposed Project and were fully analyzed as part of the Draft PEIR.

The only significant and unavoidable impact identified in the Draft PEIR is greenhouse gas. The County of Los Angeles Board of Supervisors will need to adopt a Statement of Overriding Considerations as referenced in the comment.

Please refer to Section 1.3, Recirculation Determination, of this Final PEIR.

**Response to Comment B5(A)-20:**

Fire hazard removal and a revegetation plan for areas outside of the project area would be under the purview of the Sanitation Districts and not the County of Los Angeles or the Proposed Project.

**Response to Comment B5(A)-21:**

This comment addresses emergency access points. Figure 3.14-7 of the Draft PEIR shows five main evacuation and emergency access points that could be used by the LACFD. The impact discussion on pages 3.14-53 and 3.14-57 describe the emergency access points and plans. Please refer to the response to comment B5(A)-12.

**Response to Comment B5(A)-22:**

This comment state that the revegetated slopes could be used for park use and habitat. Phase III of the Proposed Project includes under planting of the nonnative slopes with native planting for improvement of the wildlife corridor. It will take over 75 years for methane gas production within the landfill to decline to such a level that the surface gas pipes may be removed and the side slopes become available to the park. Once the landfill has stabilized and is no longer producing methane, the outer gas infrastructure could be removed.

**Response to Comment B5(A)-23:**

Comment noted.

**Response to Comment B5(A)-24:**

The Master Plan envisions three major phases of development over the next 30 years and two additional phases that would be refined as landfill deck settling is completed, park operations increase, and landfill maintenance operations decline in approximately 2043.

The park at all times will meet public health and safety regulations, such as those required by the Los Angeles County Fire Department and other applicable regulatory agencies. The proposed construction of the park loop road in Phase I would provide access to park facilities for emergency access.

As stated in the Draft EIR, the proposed non-native plant nursery may be needed earlier than in Phase III. The landscaping plan will include a plant palette derived from the existing Sanitation Districts approved plant palette for the landfill. The plant palette will be composed of non-invasive species that are adapted to the conditions found on the project site and do not require high irrigation rates.

Your comment on Army portable bridges is noted.

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**Letter B5(B) - Save Our Community**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); ["Jan Sandgren"](#); [Alfredo Aguirre](#)  
**Subject:** FW: Comments on the Puente Hills Park DEIR  
**Date:** Monday, August 08, 2016 2:26:48 PM  
**Attachments:** [Fire.doc](#)  
[Park Comments Executive Summary.doc](#)  
[Utilities.doc](#)

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This is 2/3.

**JULIE YOM, AICP**  
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Department of Parks and Recreation | Planning Division  
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Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

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**From:** James Flournoy Secretary [mailto:saveourcommunityinc@live.com]  
**Sent:** Monday, August 08, 2016 2:08 PM  
**To:** Julie Yom <jyom@parks.lacounty.gov>  
**Cc:** jlicari2013@gmail.com; mhugheshh@aol.com  
**Subject:** Re: Comments on the Puente Hills Park DEIR

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Save Our Community Comments on the DEIR Executive Summary

ES.4

Project Must include all 600 Acres in Joint Use including landfill slopes.

Highly hazardous Foreign Eucalyptus must be removed. A replanting plan must be prepared.

The high fire danger prohibits the handicapped and non ambulatory, large gatherings, private automobiles and trail-lift skyway access to the upper decks as there are no adequate fire exits available except for pedestrians, cyclists and equestrians. This is the projects highest priority.

Feasibility of locations of mid support towers must be determined as part of the EIR Process. It is impossible to even approximate costs without knowing if, for example, piles must be utilized.

ES.4.2.3 Native plants are naturally drought tolerant. A plant pallet **MUST** be part of the EIR.

The landfill slopes would be preserved, restored, and/or enhanced for wildlife.

WE take it that the physical slopes are being preserved and the vegetation will be "restored" and enhanced for wildlife

ES.4.2.5 Access to the site must also be provided from the Rio Hondo College area, Rose Hills Area, Schabarum Trail, SCE ROW, and Hacienda Heights and for Fire Exits. The Roads and Trail-lift not to be used until the extreme fire hazard is mitigated.

**ES.4.2.6 Perennial Native grasses must be specified, Pampas and invasive, foreign European grasses must be removed.**

**"However, drought-tolerant**

"nonnatives are part of the planting plan because planting is difficult to establish on the mono-soil clay landfill cap that covers the filled areas."

**NOT ACCEPTIBLE- bring in appropriate topsoil, use containers,**

**"the park cannot be limited to an all-natives plant palette."** Cannot or May-not, either is unacceptable, back to the drawing board. Difficult is not impossible.

ES.4.3 Phasing

Sufficient detail is known about the projects to be implemented at the beginning of the Master Plan timeline so that these projects can be discussed in detail at the Project EIR level.

WE suggest that Phase I be included in this EIR.

This Program EIR is more of the level of a Scoping Document or Initial Study and is not sufficient as a Program EIR as there is not enough detail for engineering, budget or decision making.

It does not show that features are feasible or cost feasible.

It does not give decision makers enough information to sequence projects- like the trail-lift.

"No further CEQA documentation is anticipated for these projects."

Given the scope of this document Program EIRS or Supplemental EIRs will be required even for Phase 1. For example there is no geotechnical investigation for the proposed trail-lift towers.

It cannot be shown that the trail-lift, a major Phase 1 feature, is reasonably Feasible.

"In the first decade, park development would occur on the Western Deck and non-fill areas including the Entry Plaza, M&O areas, and Nike Hill, providing the basic park infrastructure for park visitors and park maintenance." We see no reason that these (hard rock) areas could not be included in Phase 1 once a Seismologist has given a seismic spectrum including

**B5(B)-1**

**B5(B)-2**

**B5(B)-3**

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accelerations, velocities and permanent ground displacements both horizontal and vertical and estimated duration of shaking and all geotechnical (especially slope stability/ landslide) studies be re-evaluated. The Initial Study level geotechnical investigation we applaud as using pseudo static analysis instead of the usual preliminary static analysis however the use of Internet Seismic data allows the results to be unconservative and not a basis for engineering design or decision making.

"Finally, public involvement and stakeholder partnerships throughout all phases would guide and evolve the programming and management of the park."

The Program EIR for this phase MUST be included in this EIR or a commitment for Further CEQA documentation must be made instead of taking the project behind closed doors disguised as mitigation.

**B5(B)-3 Cont.**

ES.6 An Alternative must be provided in the event that the Sanitation Districts Slopes cannot be rid of the hazardous foreign Eucalyptus.

The Alternative would find the Trail-Lift is eliminated, or it could be included if those not capable of using the emergency exits were excluded, The performance space would not be possible at least for 5000 persons (provide an ambulatory evacuation plan) The Nike hill overlook could be fully built and the restrooms and picnic areas provided, Interpretive/ Overlook Areas, dog Park, Stair Climbs Flare tower Structure, Art. The Plant Nursery is critical in any case. Overcrossings and bridges would be ok

Slides and Zip line could be provided but visitors have to get to them on their own. This alternative would be to maximize enhancement of native habitats and provision of wildlife linkages within the park while providing passive recreational amenities to enable public enjoyment of this County regional park. This Alternative's nature-focused and passive recreational options would fulfill some of the project objectives, with other objectives deferred until the fire danger is mitigated.

Table ES-4 The Alternative proposed does not preclude morphing into the Proposed Project or High Build Alternative. Infrastructure such as the Nike Hill Overlook must be designed in a modular fashion so that easy expansion is possible when public road ingress and egress and the trail-lift are safe.

**B5(B)-4**

ES.7

the PEIR DOES NOT adequately describes the environmental impacts of the Proposed Project recommended mitigation measures (additions) and should be modified/ enhanced/ .

We recommend the proposed Alternative Project for Approval, given mitigation.

**B5(B)-5**

Table ES-6

Air Quality

The only impact to air quality would be stalled out funeral processions. CO "HOT SPOT" simulation/ modeling must be performed. Clean buses must be required.

"The Proposed Project does not include a land use associated with odors." "taco trucks" and food preparation???

**B5(B)-6**

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B8 Preparation of a landscaping plan MUST be accomplished as part of the EIR Process.  
A map and inventory of current foreign and invasive species Must be prepared.  
A remediation plan must be prepared. As part of the EIR. For the whole of the Sanitation Districts property

**B5(B)-7**

G1

Large-diameter bucket auger borings to evaluate geologic conditions for slope stability at the Entry Plaza, Trail Lift Tower locations, and Flare Site, and to evaluate geotechnical engineering properties for tower foundation design;

Must be done as part of the EIR Process. Project must be shown to be feasible. See the LACODPW GMED Manual

Slope stability analyses to evaluate the stability of the adjacent graded and natural slopes near proposed structural improvements, including the evaluation of possible effects to the western Nike Hill slope buttress;

Dynamic slope stability analysis must be completed using ground-motions approved by a professional working in the field of seismology. The project must be shown to be feasible.  
Existing Tanks must be analyzed

"Geotechnical engineering analyses to develop pile foundation parameters for buildings and trail lift towers."

The borings above must be completed first. It is currently unknown if piles will be needed or not and this is a major cost/ feasibility issue which must be considered in the EIR.

A report complying with the Seismic Hazards Mapping Act and LATEST SP-117 (an obsolete version was used by the consultant), latest LACODPW GMED MANUAL, LA County Administrative Manual, and LA CO Grading Guidelines as updated to the more recent County Building Code, Grading Code must be accomplished and the Report Peer reviewed (to applicable standards) PRIOR to the approval of any project for human occupation. Taken together the regulations require the use of the latest data and methods. It is therefor highly recommended that the 2016 Building Code, ASCE-7-16 and FEMA NEHRP 2015 be utilized along with Comments and Recommended Practices.  
See our comments Attached

**B5(B)-8**

Hazards and Hazardous Materials

Fire Risk to people is Critical

A report calculating the fuel load on the slopes below the project must be completed and a wildfire heat map and smoke map for the project prepared assuming Santa Ana wind conditions.

Heat Rises and is wind driven

We do not see any clearing on down-slope hillsides between the fuel load and the site as defensible space as far as heat, smoke, flying embers and the hazard to the public is concerned.

The highly flammable oil filled eucalyptus must be completely removed.

The County Board of Supervisors must direct the Sanitation District to accomplish this task, prepare a re-vegetation plan and begin implementation of re-vegetation with native plants prior to the public

**B5(B)-9**

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utilization of the access road and/or trail-lift.

Fire exits must be provided East toward Hacienda Heights as well as Rose Hills and Rio Hondo College.

See our comments attached

**B5(B)-10**

Hydrology and Water quality

What is a drought tolerant natural plant?

As opposed to artificial plants?

Organic?

No GMO's?

See our comments attached

**B5(B)-11**

Recycle/ Reuse of Stormwater and Gray-water is required

**B5(B)-12**

NOISE- pseudo siren use ( car alarm sounds) by funeral patrols must be prohibited

SPECIAL EVENTS

There Must be no special events except for pedestrians until the required fuel modifications and removal of the Eucalyptus has been accomplished

**B5(B)-13**

Have sufficient reliable water supplies available to serve the project demands from existing entitlements and resources.

**B5(B)-14**

Utilities

It must be proven that Tanks and Distribution are resilient  
see our comments attached

**Save Our Community comments on FIRE Puente Hills Project**

**Scoping**

**i) Does the proposed use constitute a potentially dangerous fire hazard?**

**"The Proposed Project is a recreational facility which does not constitute a potentially fire hazard.**

**However, the project site presents several fire hazards related to the closed landfill, adjacent wildlands, and adjacent land uses.**

**The EIR will analyze fire hazards. "**

**THE EIR HAS NOT ANALYZED THE THREAT OF WILDFIRES OR SANTA ANA WIND DRIVEN WILDFIRE or any purported analysis is insufficient.**

**3.8.1.2 Fire Hazard Severity Zones**

**Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan;**

◆ Expose people or structures to a significant risk of loss, injury, or death involving fires, because the project is located:

- Within a Very High Fire Hazard Severity Zone (Zone 4)?
- Within a high fire hazard area with inadequate access?
- Within an area with inadequate water and pressure to meet fire flow standards? and/or
- Within proximity to land uses that have the potential for dangerous fire hazard?

◆ Constitute a potentially dangerous fire hazard.

Threshold: Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Emergency access for future park uses is described and analyzed in Section 3.14, EXACTLY WHERE IN 3.14????

Transportation/Traffic.

Threshold: Would the project expose people or structures to a significant risk of loss, injury, or death involving fires?

The conversion of the landfill into a park use would increase the human presence at the site, especially during peak park use times and special events.

Park design features such as limiting parking to paved areas, limiting park users to public areas only, and compliance with fuel modification guidelines would reduce the potential for fire hazards. A less than significant impact would occur.

**3.8.6 Residual Impacts After Mitigation**

Impacts would be less than significant after mitigation.

**3.14.2.1**

This analysis includes review of future roadway design characteristics and park uses and potential impacts that could arise on park roads

**B5(B)-15**

**B5(B)-16**

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**3.14.4 Thresholds of Significance**

**3.14.5 Alignment Alternative 2 requires no further consideration**

**Alignment Alternative 1  
Alignment Alternative 3**

**Perhaps both are required for emergency access to the SCE ROW and Rose Hills Road Network,  
see**

**Figure 3.14-7 Emergency Access and Evacuation Points # 4**

**The Schabarum-Skyline Trail along this reach is lined with a mature  
windrow of eucalyptus**

**Does the Special Interest Business and Professions code cover funeral processions?  
"they are commonly escorted by uniformed peace officers"- This statement is FALSE**

**Noise and Air Pollution from Funeral Processions must be addressed  
Who would have right-of-ways--- escorted funeral processions or the signal and  
pedestrians, equestrians and/ or cyclists?  
Do the escorts get to use their car alarms?**

**B5(B)-16  
Cont.**

**B5(B)-17**

**3.14.5.4 Performance Events**

The Proposed Project includes up to 25 events per year of up to 5,000 people.  
These events would result in impacts to the internal and external circulation systems and  
emergency access during such events.  
Mitigation Must be provided for evacuation during fire especially for non ambulatory and the  
handicapped  
Mitigation must be provided for the loss of the use of the roads and sky-way for the evacuation.  
Evacuation must consider Santa Ana wind conditions

Impacts from potential conflicts with the processions on the proposed Rose Hills Memorial Park access  
road and performance **events would be mitigated to a less than significant level with  
Mitigation Measure T-2.**

Impacts to emergency services would be less  
than significant with the implementation of Mitigation Measures PS-1 through PS-4 from  
Section 3.12, Public Services of this EIR. Impacts from potential conflicts with the  
processions on the proposed Rose Hills Memorial Park access road and performance  
events would be mitigated to a less than significant level with Mitigation Measure T-2.

**Figure 3.14-7 Emergency Access and Evacuation Points**

**The existing main entrance off of Crossroads Parkway South and  
the entrance station area would serve as the primary emergency ingress and egress.  
This main entrance might be unavailable and alternatives for the handicapped and non ambulatory  
must be provided.**

**B5(B)-18**

**Figure 3.14-7 Emergency Access and Evacuation Points #5**

Ingress and egress at the street end of Orange Grove and up the Eastern Canyon either at Canyon 4 or Canyon 5 (OR BOTH) could service park emergencies as a second option if the main entry is blocked by traffic, landslide, **fire**, or other emergency event requiring evacuation of park users (Withers & Sandgren 2016).

ACCESS to/from the EAST is required as part of PHASE 1.

If this access is not usable by vehicles then private vehicles and the skyway must not be implemented and no performances allowed until all the Hazardous Eucalyptus is removed from the whole of the Landfill as there would be no exit available for the non ambulatory.

**3.14.7 Residual Impacts After Mitigation**

With implementation of Mitigation Measures T-1 through T-6, any residual impacts would be less than significant.

There must be a mitigation measure covering fire during santa ana win

**B5(B)-18 Cont.**

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SOC Comments on Water and Utilities PHP DEIR

"Groundwater is obtained from four separate SGVWC wells"

Over-pumping by SGVWC and its effect on historical artesian sources in the Whittier Narrows and pollution plumes including Superfund Pollution plumes must be considered.  
Lawsuits against SGVWC must be considered to see if similar is possible at proposed wells or aquifer.  
Compliance with SGMA must be verified. Water usage must be mitigated by replenishment.

SGVWC wells and distribution system serving the project must be surveyed for "resilience"  
Are there back up generators readily available for pumps both at the wells and onsite.  
Is there sufficient fuel available

"Potable water is supplied to two storage tanks on the landfill."

The tanks MUST be re-evaluated using latest seismic data.

Tanks failed in the Northridge earthquake in Topanga Canyon as did pipeline distribution.

Tanks are vulnerable to mushrooming, elephant footing, rocking, failure of hold-downs, failure of rigid connections and lack of automatic shutoffs

Tanks are vulnerable to Vertical Ground motion

Tanks are vulnerable to long period long duration ground motions

Tanks must be designed to Seismic class IV- Essential Service Structures if used for fire fighting.

A Flood map must be made for the hazard of tank rupture above the public

Structure-Soil Interaction and tank foundations must be investigated as well as tank anchorage

We expect tanks will need mat foundations securely anchored to bedrock or base isolation.

Tanks have had to be designed and constructed to Seismic Class IV- Essential Services Structures aka Critical Infrastructure from at least FEMA NEHRP 2003 however we question if this has been accomplished. Seismic requirements have increased greatly and will continue to increase with problems found with even CBC 2016/ ASCE-7-16 and FEMA NEHRP 2015. Standards of Professional Practice must be employed.

"The first is a tank fed directly from the main 14-inch lateral from Crossroads Parkway."

The Pipeline distribution system (s) must be verified as ductile from well to tank.

Is there a Gray-water Plan for lavatories, sinks, fountain drains etc? Best Practices are required

Stormwater LID "to the extent practicable"

Recycle/ Reuse is Required- if this is provided it is not clear- it MUST be provided "Expand stormwater capture infrastructure" Must be implemented with Any construction, Cisterns, etc.

The Park Design Guidelines and Standards – are not attached so we can't see what the stormwater "information" is

"runoff collected from the surface of the landfill enters the San Gabriel River" Is stormwater going to the settling basins?

A plan to RECYCLE/REUSE stormwater onsite must be considered as less reclaimed water would be required freeing up this valuable asset for others.

**B5(B)-19**

**B5(B)-20**

## **Responses to Letter B5(B) – Save Our Community**

### **Response to Comment B5(B)-1:**

The comment states that the Proposed Project must include all 600 acres in joint use, including landfill slopes. As discussed Section 2.4 of the Draft PEIR, the Sanitation Districts entered into an irrevocable agreement with the County of Los Angeles to designate the fill portions of the landfill as open space. Subsequent approvals provided further details on the area available for park uses and included language that acknowledges the Sanitation District's need to operate and maintain the environmental control systems in the designated open space areas and that the park and any subsequent improvements would not impair the Sanitation Districts activities or systems that protect public health, safety, and the environment. As such, not all areas are available at the time of preparation of this Final PEIR. As shown on the graph in Section 2.8 of the Draft PEIR, as the Sanitation Districts' maintenance and regulatory requirements decrease over time park development would increase, which would include re-evaluation of areas available for development as the closed landfill ages.

The comment also states that the landscaping plan must remove the highly hazardous foreign eucalyptus because of the high fire danger they pose and the lack of adequate fire exits. A detailed discussion of fire risk and safety can be found in Section 3.8, Hazards and Hazardous Materials, pages 3.8-14 and 3.8-15. In addition, Section 3.12.4.1, Fire and Sheriff Protection of the Draft PEIR, includes an analysis of project impacts on the Los Angeles County Fire Department (LACFD). Mitigation Measure PS-1, requiring a Fire Incident Plan, would reduce impacts to a less than significant level. Figure 3.14-7 of the Draft PEIR shows five main evacuation and emergency access points that could be used by the LACFD. The impact discussion on pages 3.14-53 and 3.14-57 describe the emergency access points and plans.

The comment also states that a plant pallet must be part of the EIR. The Draft PEIR includes Mitigation Measure B-8, which requires the preparation of a landscape plan.

### **Response to Comment B5(B)-2:**

This comment states that it is not acceptable to use non-native plants as part of the planting plan. The mono-soil clay cap prevents the establishment of some native plants; therefore, non-native plants are proposed when a native species cannot be used. The mono-soil clay cap is specifically designed to keep rain and irrigation water from seeping into the landfill and percolating down to create leachate. The plant palette would be derived from the existing Sanitation Districts approved plant palette for the landfill.

### **Response to Comment B5(B)-3:**

This comment states that not enough evidence is presented in the Draft PEIR to adequately analyze Phase I elements of the Proposed Project at the project level. The response to Comment B5(A)-1 and Comment B5(B)-2 included in this Final PEIR would also be applicable to this comment.

**Response to Comment B5(B)-4:**

This comment states that an alternative must be provided in the event that eucalyptus trees, which present a fire hazard, cannot be rid from the slopes of the landfill. The commenter lists several project elements and presents them as an alternative to the Proposed Project. Comment has been noted.

**Response to Comment B5(B)-5:**

This comment states that the Draft PEIR does not adequately describe the environmental impacts of the Proposed Project. The Draft PEIR was prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code §§ 21000-21177) and the Guidelines for the Implementation of CEQA (California Administrative Code §§ 15000 et seq.).

**Response to Comment B5(B)-6:**

This comment states that a CO “Hot Spot” study must be conducted. No CO “hot spot” modeling was performed and no significant long-term air quality impact is anticipated to local air quality with the ongoing use of the Proposed Project because the intersection with the highest traffic volume would be substantially less than the 100,000 vehicles per day CO standard.

This comment alludes to taco trucks and food preparation resulting in odors. The Proposed Project would include food truck space at the Nike Hill plaza. Food trucks would result in temporary odors associated with food preparation. However, the Proposed Project would comply with SCAQMD Rule 402 (Public Nuisance Regulation). Furthermore, members of the public that find odors associated with food trucks a nuisance would have the opportunity to visit other areas of the park and avoid the food truck space.

**Response to Comment B5(B)-7:**

This comment states that preparation of a landscape plan, an inventory of invasive species, and a remediation plan must be prepared as part of the EIR. The Draft PEIR includes Mitigation Measure B-8, which requires the preparation of a landscape plan. Figure 3.4-2 in the Draft PEIR, includes a map of vegetation communities mapped in the project area. Non-native plant species observed in the project area are listed in the plant compendium (Appendix A) in the biological technical report prepared for the Proposed Project and included in the Draft PEIR in Appendix C. The Proposed Project is not a remediation project; as such, no remediation plan is required.

**Response to Comment B5(B)-8:**

The comment states that detailed geotechnical assessment, including dynamic slope stability analysis, that complies with the latest regulations and guidelines must be part of the EIR process.

An engineering design report (PACE 2016) and geotechnical feasibility evaluation (Ninyo & Moore 2016) have been developed for the Phase I and II projects to ensure that park features

would be constructed to be consistent with County requirements for safety and stability, while still ensuring that park activities would not interfere with landfill maintenance and operations. The geotechnical feasibility evaluation is provided as Appendix E of the Draft PEIR. Detailed analysis of each of the project elements can be found on pages 3.6-12 through 3.6-16 of the Draft PEIR. Mitigation Measure G-1 requires that a qualified geotechnical firm conduct site-specific geotechnical investigations during the design of each project.

CEQA Guidelines Section 15126.4 provides guidance on mitigation in CEQA documents. Section 15126.4(a)(1)(B) states that "Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one way." The courts have also recognized that the formulation of precise mitigation may be infeasible because the exact nature of potential impacts is not known at the time of project approval. Mitigation strategies have been upheld when the Lead Agency commits to developing mitigation details in the future in accordance with specific performance criteria adopted in mitigation measures at the time of project approval (*Sacramento Old City Assn. v. City Council* (1991) 229 Cal. App. 3d 1001, 1028-29). This type of mitigation strategy is not "deferred mitigation" under CEQA.

**Response to Comment B5(B)-9:**

This comment states that a report calculating the fuel load on the slopes below the top decks must be completed to adequately assess the fire hazard from eucalyptus tree stands. Fire hazard removal for areas outside of the project area would be under the purview of the Sanitation Districts and not the County of Los Angeles or the Proposed Project.

**Response to Comment B5(B)-10:**

The comment states that fire exits must be provided east towards Hacienda Heights, as well as Rose Hills, and Rio Hondo College. Emergency exits are shown in Figure 3.14-7 of the Draft PEIR. A total of five evacuation points would be provided by the Proposed Project.

**Response to Comment B5(B)-11:**

This comments posts several questions, including: What is a drought tolerant plant? As opposed to artificial plants? Organic? No GMOs?

Comment has been noted. The Proposed Project landscape plan would use native plants to the extent possible given the constraints posed by the mono-soil clay cap.

**Response to Comment B5(B)-12:**

This comment states to recycle and reuse stormwater and gray water and that siren use (car alarm sounds) by funeral patrols must be prohibited. Comment has been noted.

**Response to Comment B5(B)-13:**

This comment states that there must be no special events except for pedestrians until the required fuel modifications and removal of the eucalyptus trees has been completed. Fire hazard removal for areas outside of the project area would be under the purview of the Sanitation Districts and not the County of Los Angeles or the Proposed Project. It should also be noted that the Proposed Project includes Mitigation Measure PS-1, which would require the special event operator to coordinate with the Los Angeles County Fire Department (LAFCD) and develop a Fire Incident Plan.

**Response to Comment B5(B)-14:**

The comment states that it must be proven that the tanks and distribution system are resilient. A Grading, Drainage, and Utility Plan Report Puente Hills Engineering Design Report (PACE 2016) and geotechnical feasibility evaluation (Ninyo & Moore 2016) have been developed for the Phase I and II projects to ensure that park features would be constructed to be consistent with County requirements for safety and stability.

**Response to Comment B5(B)-15:**

This comment asks where in Section 3.14 of the Draft PEIR, emergency access is discussed. Emergency access is discussed on pages 3.14-53 through 3.14-58.

**Response to Comment B5(B)-16:**

This comment states that perhaps both Rose Hills alignments (Alternative 1 and 3) would be required for emergency access to the SCE ROW and the Rose Hills Road network. Emergency access is discussed on pages 3.14-53 through 3.14-58. Neither of these two alternatives would be required for providing emergency access to and off the site.

**Response to Comment B5(B)-17:**

This comment states that the statement that funeral processions are commonly escorted by uniformed peace officers is false. Comment has been noted.

The comments also states that noise and air pollution from funeral processions must be addressed. Impacts from the use of the proposed Rose Hills easement by funeral processions were included in the scope of the Draft PEIR. As such, the analysis presented in Section 3.3 Air Quality and Section 3.11 Noise takes into account the impacts from funeral processions on air emissions and noise.

**Response to Comment B5(B)-18:**

This comment states that mitigation must be provided for evacuation during fire especially for non-ambulatory and the handicapped. The Proposed Project includes Mitigation Measure PS-1, which would require the special event operator to coordinate with the Los Angeles County Fire Department (LAFCD) and develop a Fire Incident Plan. The Fire Incident Plan would identify

evacuation procedures for all attendees of special events including those with physical impairments.

The comment also states that if ingress and egress at the street end of Orange Grove Avenue and up the Eastern Canyon is not usable by vehicles then private vehicles and the skyway must not be implemented and no performances allowed until all hazardous eucalyptus are removed. As previously stated, fire hazard removal for areas outside of the project area would be under the purview of the Sanitation Districts and not the County of Los Angeles or the Proposed Project. As shown in Figure 3.14-7, emergency access through Orange Grove Avenue and the Eastern Canyons would be used if the emergency necessitated such use for the safety of the public.

**Response to Comment B5(B)-19:**

This comment states that over-pumping by SGVWC and its effect on historical artesian sources in the Whittier Narrows, and pollution plumes must be considered. SGVWC is required to meet regulatory requirements regarding the water quality of potable water delivered to its customers. Investigations and cleanup of pollution plumes in the aquifer is under the regulatory oversight of the Regional Water Quality Control Board (RWQCB).

This comment states that water usage must be mitigated by replenishment. Comment has been noted.

The comment states that the SGVWC wells and distribution system serving the Proposed Project must be surveyed for "resilience". The maintenance and reliability of the SGVWC wells and distribution system is the responsibility of the SGVWC and not the Proposed Project.

The comment also states that existing tanks must be evaluated for safety performance during seismic events. The seismic performance of existing infrastructure is the responsibility of their owners. The Proposed Project would include the preparation of an emergency response plan, as detailed on page 3.14-53 of the Draft PEIR. The emergency response plan would provide the appropriate action to address emergencies in the proposed park.

**Response to Comment B5(B)-20:**

The comment asks if grey water would be used by the Proposed Project. Phases I and II of the Proposed Project would not employ grey water. However, Future Phases may include the use of grey water.

The comment states that stormwater low impact development (LID) must be implemented. LID principles would be implemented to the extent possible given the constraints posed by the environmental controls of the closed landfill. The landfill cap and slopes are designed to shed water away from the landfill to limit potential percolation into the landfill. Water that percolated into landfill cells could produce leachate, which could contaminate aquifers. The Proposed Project would collect runoff from the new access road across the Nike Hill buttress in Basin T. The water captured in Basin T would be conveyed into Basin A (existing). After the water has settled, it would be filtered and used to recharge the 650,000-gallon tank that is located to the

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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southwest of the Gas-to-Energy Facility, as detailed on page 3.9-12 of the Draft PEIR.  
Stormwater from other areas of the landfill would be conveyed to existing detention basins.

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**Letter B5(C) - Save Our Community**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); ["Jan Sandgren"](#); [Alfredo Aguirre](#)  
**Subject:** FW: Comments on the Puente Hills Park DEIR BIOLOGY  
**Date:** Monday, August 08, 2016 2:27:18 PM  
**Attachments:** [biological excerpts reference.doc](#)  
[Puente Hills LA County SEA.doc](#)  
[SOC comments on Biology.doc](#)  
[SOC Proposed Mitigation Measures - Biology.doc](#)  
[Vegetation Communities.doc](#)

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This is 3/3.

Thanks,

JULIE YOM, AICP  
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Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)

*Please note that our offices are closed on Fridays.*

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**From:** James Flournoy Secretary [mailto:saveourcommunityinc@live.com]  
**Sent:** Monday, August 08, 2016 2:12 PM  
**To:** Julie Yom <jyom@parks.lacounty.gov>  
**Cc:** jlicari2013@gmail.com; mhugheshh@aol.com  
**Subject:** Re: Comments on the Puente Hills Park DEIR BIOLOGY

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Julie Yom  
County of Los Angeles  
Department of Parks and Recreation  
Planning & Development Agency  
510 S. Vermont Avenue  
Los Angeles, California 90020

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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SOC Comments On Biology

4.1 Entry Plaza Area

relatively dense growth of trees, shrubs, and grasses. Some of the trees have fallen and some trees show evidence of slope creep.

4.3 Lift tower The natural and landfill waste slopes are covered with a relatively thick growth of vegetation.

4.4

4.5 Flare site The cut slopes were covered with a moderate growth of vegetation.

And densely vegetated natural slopes that descend from the east side of the site

The slope has a thick growth of native vegetation and evidence of slope instability was not observed during our site reconnaissance.

These Known Fire Hazards must be mitigated

It would be helpful to have a Biological History from the time of Native Americans and the Anza Expedition, the uses since then such as Cattle ranching.

An inventory of foreign and invasive plants, trees, and grasses with their description, method of spread and propagation and a map is required in order for decision makers to commit to a multi-year program of eradication, removal, and suppression of seed beds.

A removal plan is required

A re-planting plan is required

WE are attaching some comments or excerpts from others to aid in preparation of your EIR

We are attaching proposed mitigation measures

WE suggest that you review comments made during scoping by WICCA, Habitat Authority (Michael Hughes) SOC, Sierra Club, and others and incorporate them in your revised DEIR, respond to them as if they were comments on this DEIR

<https://withersandsandgren.egnyte.com/fl/RuXNhzhAev#folder-link/?p>

are referenced as if they were attached

**B5(C)-1**

## **Responses to Letter B5(C) – Save Our Community**

### **Response to Comment B5(C)-1:**

The comment provides comments on biology and includes four attachments for consideration in preparation of the Final PEIR. The four attachments include excerpts or information on the Puente Hills SEA, vegetation communities, proposed mitigation measures, and EIR biological samples which are hereby incorporated by reference.

The comment also raises concerns with fire hazards in the Entry Plaza area. Please refer to the response to comments B5(A)-3 and B5(A)-12.

Section 3.4, Biological Resources, of the Draft PEIR, includes an adequate analysis of plants and vegetation communities sufficient to determine impacts and includes appropriate mitigation measures to reduce impacts to a less than significant level. A landscaping plan is included as part of Mitigation Measure B-8.

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**Letter B5(D) - Save Our Community**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); ["Jan Sandgren"](#); [Alfredo Aguirre](#)  
**Subject:** FW: Comments on the Puente Hills Park DEIR Geotechnical  
**Date:** Monday, August 08, 2016 2:53:14 PM  
**Attachments:** [2015-Issues\\_and\\_ResearchNeed.pdf](#)  
[2016Coll\\_Crouse.pdf](#)  
[2016Coll\\_Kircher.pdf](#)  
[ATC-83Soil\\_Structure\\_Interaction.pdf](#)  
[CalTrans ARS 10 w near field.php.png](#)  
[CalTrans ARS tool.doc](#)  
[CalTrans ARS with nearfield.php.png](#)  
[current\\_codes.doc](#)  
[Review checklist.pdf](#)  
[San Andreas Day and Olsen.doc](#)  
[SCEC LandslideProcedures-June 2002.pdf](#)  
[Seismic\\_Factor\\_Study.pdf](#)  
[Seismology notes.doc](#)  
[Shallow fill over Grading.doc](#)  
[SOC Geotechnical Comments.doc](#)  
[strong shaking notes.doc](#)  
[sydnor-july2005.pdf](#)  
[Whittier Fault extension notes.doc](#)

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Freddie,

I just received another email from James Flournoy.  
The attachments seem like references to his comments.

**JULIE YOM, AICP**  
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*Please note that our offices are closed on Fridays.*

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**From:** James Flournoy Secretary [<mailto:saveourcommunityinc@live.com>]  
**Sent:** Monday, August 08, 2016 2:26 PM  
**To:** Julie Yom <[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)>  
**Cc:** [jlicari2013@gmail.com](mailto:jlicari2013@gmail.com); [mhugheshh@aol.com](mailto:mhugheshh@aol.com)  
**Subject:** Re: Comments on the Puente Hills Park DEIR Geotechnical

---

Julie Yom  
County of Los Angeles  
Department of Parks and Recreation  
Planning & Development Agency

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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attached please find The SCEC LANDslide document which is required by the LA County GMED Manual for the Preparation of Geotechnical Reports

and Dr Syndors CGS monograph for Essential Services structures- Critical Infrastructure (although he does not like the term) Ignore the title about schools and hospitals- in this case Water Tanks above the public or used for firefighting- as with all documents of this age including the GMED Manual they must be updated to current codes ( also attached) by the consultant

A "get your hands dirty" Geotechnical/ Geologic report is required that meets the requirements found in the GMED Manual- a "dry lab" look it up on the internet Geotechnical Review, while maybe ok for a Scoping Document or to support an Initial Study, is not sufficient of an EIR much less Project approval.

We are also including reports that are necessary when considering critical infrastructure given the rapidly changing CBC and ASCE-7 and FEMA NEHRP see our attached comments. We expect the consultants to be familiar and discuss the issues as the GMED manual requires latest data and methods not 50 year old techniques. any questions drop us a note

sincerely yours  
Save Our Community

**B5(D)-1**

## **Responses to Letter B5(D) – Save Our Community**

### **Response to Comment B5(D)-1:**

The comment provides 18 attachments for consideration in preparation of the Final PEIR. The attachments include reference documents/manuals for geology, landslides, water tanks, and infrastructure which are hereby incorporated by reference.

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**Letter B6 - Sierra Club**

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**Comments on the Draft Program Environmental Impact Report for the Puente Hills  
Landfill Park Master Plan Project, June 2016. State Clearinghouse Number 2015121051**

Dear Ms. Yom:

The San Gabriel Task Force of the Angeles Chapter of Sierra Club thanks the Los Angeles County Department of Parks and Recreation for the opportunity to submit the following comments on the proposed new regional park to be created from the now closed Puente Hills Landfill as proposed in the Draft Program Environmental Impact Report for the Puente Hills Landfill Park Master Plan Project dated June 2016.

The San Gabriel Valley Task Force was organized by the Angeles Chapter of the Sierra Club in 1999 to work with San Gabriel Valley cities and political leaders to seek ways to create a more livable environment for valley residents while preserving or improving natural resources. Since that time, as part of our mission, we have promoted low impact outdoor recreation from the San Gabriel Mountains and foothills, along the urban rivers, and in the Puente-Chino Hills.

We have been involved with the development of the plans through attendance at the workshops, conversations with the planners, and in meetings with representatives of the Los Angeles County Dept. of Parks and Recreation. We applaud you for the many presentations and community meetings held to involve the public in the planning process.

We have reviewed the PHLDEIR and understand some of the constraints under which this park will be constructed (i.e. agreements with Rose Hills, traffic problems due to one access road and the fact that the LACDPR does not control the slopes, and the need to maintain the gas recovery system already in place). It is with this understanding we offer the following general comments.

The closure of the Puente Hills Landfill presents an opportunity to provide the residents of the eastern San Gabriel Valley, and particularly those of the surrounding communities, with a park that brings nature closer to urban dwellers. For disadvantaged populations, this may be the only contact with nature they may easily experience.

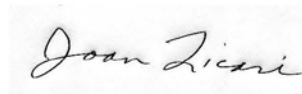
**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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For this reason, the Sierra Club believes this area should best be developed primarily as a place for passive recreation with trails for walking, hiking, cycling and riding horses, a place for families to picnic and play, and a place of escape from the hustle and bustle of the cities.

We respectfully submit the following comments on the PHLDEIR

Sincerely,



Joan Licari, D.Env.  
Chair, San Gabriel Valley Task Force  
Angeles Chapter of Sierra Club

**Sierra Club Comments on the Puente Hills Landfill Park Master Plan Draft Program  
Environmental Impact Report**

- The Sierra Club continues **support for the “Low Build Alternative”** that emphasizes contact with nature, opportunities for walking/hiking, bird watching, bicycling, stair climbs, and equestrian activities. Thus development of trails, connections with the Schabarum trail and trails on the east side are strongly encouraged. We support the area designated for equestrian activities in the southern part of the park near to the Schabarum trail with provision of adequate parking for horse trailers and restrooms for all who would utilize this part of the park.
- We strongly oppose zip-lines, slides, and 2 bike skills areas. We would prefer to see the soils storage area used for some other temporary purpose—perhaps it could be suitable for a dog park in the first phase rather than waiting for years for this amenity that is now sorely needed in the surrounding communities.

**B6-1**

Although we understand the idea of providing these types of activities, the added impact to traffic to these areas, when traffic problems are already a major concern, is not desirable. The interaction between park visitors, trucks and maintenance vehicles associated with Sanitation District, MRF trucks, and particularly Rose Hills funeral processions will invariably cause congestion and undesirable interaction between the various users.

**B6-2**

We also are concerned with the cost of providing the infrastructure for zip-line and slides is high and better used for developing a more natural experience for urban dwellers

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whose only contact with “nature” is a park like this. Another concern is how concessions providing these services will be operated and the cost to users.

**B6-2  
Cont.**

- **We believe lack of access from surrounding areas, particularly Hacienda Heights, will preclude easy use by many residents who have borne the major impacts of the operating landfill.**

We do not find discussion of potential trail access from Turnbull Canyon Road, Orange Grove Ave, or Los Robles. Connections to trails must somehow be made with trails from Hacienda Heights, Whittier and regions east and west. The limited access will inhibit use by many, particularly from the Hacienda Heights area that for many years has dealt with the issues associated with the landfill operation—dust, noise, odors, debris—for many, many years.

**B6-3**

Recent gate closures and limited parking areas at local trailheads have caused severe parking problems at remaining available sites. Thus multiple park access points should be investigated.

**Canyons 2-8 must be connected to the Park from Hacienda Heights. Supervisors from the 1<sup>st</sup> and 4<sup>th</sup> Districts, the County Sanitation District, and the Dept. of Parks and Recreation should meet and see if some agreement can be reached to provide access from Hacienda Heights to trails, new and old, and to connect the Orange Grove region to the top area.**

The Skyline trail runs directly along the top of the Landfill; we support the development in the buttress area trailhead proposed nearby to provide parking, space for horse trailers, restrooms and other amenities for visitors.

The Schabarum Trail crosses through the proposed park area and continues until it crosses Turnbull Canyon Road near the crest of the road. A possible access exists at Turnbull Canyon and Skyline Drive. In addition, the Rio Hondo road to the former Nike site could be improved. This trail is quite easy because it begins at a high elevation and traverses the ridge of the Puente Hills for about 1 mile. It is an easy walk with scenic views to the east and west. This access is already popular and is almost handicap accessible.

**B6-4**

Some connection from the new park to the Sycamore Canyon Trail should be investigated. However, parking already is an issue in this area and as more people are drawn to the park the problem will increase. A solution to this problem should be investigated and included in the final planning.

- The presence of only one access is also problematic because large daytime gatherings are proposed for the park. There is only the one access road up the slope or event participants will be required to either drive, take the gondola, or utilize the training stairs.

**B6-5**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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These access routes will probably be inadequate to address the crowds for this type of activity. Planning for shuttle routes from staging points must be included for such events. Shuttle routes from surrounding areas must also be investigated before the final plan is adopted for transport of visitors to use throughout the week, not just on special event days. Shuttles would be particularly good from local areas around the base of the landfill.

**B6-5  
Cont.**

- We have great concern about the single access road the safety of visitors should an unexpected event such as fire or methane explosion occur. The access road is lined with eucalyptus trees--notorious fire hazards. Like many plants native to fire-prone regions, eucalyptus trees (aka gum trees in Australia) are adapted to survive — or even thrive — in a wildfire. Fallen eucalyptus leaves create dense carpets of flammable material, and the trees' bark peels off in long streamers that drop to the ground, providing additional fuel that draws ground fires up into the leaves, creating massive, fast-spreading "crown fires" in the upper story of eucalyptus forests. The fragrance of these trees is due to highly flammable oil in the leaves. In recent years, eucalyptus trees were removed from areas of the Native Habitat Authority lands along Colima due to fire hazard.

An event that is similar to what could happen in the Puente Hills occurred in the Oakland firestorm of 1991 with disastrous loss of homes and life. A large suburban wildland-urban interface conflagration was fanned by "Diablo Winds" similar to our Santa Ana winds. How would 5000 visitors be able to escape an event should something like this happen?

**B6-6**

Page 3.3-6 states: "An uncontrolled landfill gas release could expose on-site employees and park users to increased explosion and fire risks. In sufficient quantities and under certain conditions, landfill gas, which contains methane, can be flammable or explosive. As discussed above, the closed landfill has a landfill gas collection system to prevent landfill gas from accumulating on-site and migrating off-site." There is need for a second access road out of the park.

- **Section 2.81:** We understand this document is a long ranging master plan for implementation of park facilities in three phases over 30 years due to the settling of the landfill. However, details of project that would be implemented in the later stages of Phases II through VI (Years 21-75) become speculative (DPEIR). Planning and development for use of Phases I-III should not be isolated from each other. Development of the eastern deck could take place along with Phase I if the plans for the eastern deck are flexible to allow for later changes due to subsidence.

**B6-7**

Although the eastern and southern areas will be settling over a long period, planting of those regions with development of trails and picnic spots in those areas could occur along with more permanent development of the western section. It is stated (pg. 2-43) the 2-

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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mile inner loop trail on the western deck would be in Phase I. However, the remainder of the inner loop trail on the Eastern and southern Decks would be built during Phase III. We do not agree with the planned phasing over such a long period of time (70 years). Only grandchildren of present residents will finally get to use all the 117 acres of the park. That is a long time to wait.

We feel trails and native plantings on the Eastern and Southern Decks could be started along with Phase I projects. Portable toilets could be provided where appropriate that could be relocated as necessary, trails can be adjusted as required as subsidence occurs. Parking areas could be designated that are not permanent but with temporary surfaces such as gravel.

**Couldn't the improvement of the Schabarum/Skyline trailhead, the implementation at the eastern entrance from the Habitat Authority Preserve Area take place earlier, and connections of the park to regional trails take place along with Phase I?**

- Phases IV through VI extend development out to 75 years. To meet CEQA requirements another environmental impact statement must be done as these phases approach enactment.
- We support the use of native plantings whenever possible to enhance habitat that can connect with the San Gabriel River channel, the Merced Hills, Puente Hill Native Habitat managed lands, Puente-Chino Hills State Park and the Cleveland National Forest in the Santa Ana Mountains to form a corridor of wildlife movement from the San Gabriel Mountains, down the San Gabriel River, to the Merced and Puente Hills. We also support the plans for a native plant nursery for revegetation projects. We suggest there should be a site for a demonstration garden where gardeners could purchase plants for their own homes.
- Almost all picnic table should be covered due to the high temperatures common in Southern California.
- PDEIR predicts an estimated 25 special events, with up to 5000 visitors, Rose Hills Memorial park would generate approximately 1,150 average daily trips plus 2 to 3 funeral processions with 20-60 vehicles plus truck and other vehicle movements associated with construction during phases up to 70 years. Although we previously opposed overpasses for pedestrians, seeing traffic projections suggests these would be a welcome addition to visitors and wildlife alike.
- We support the construction of all permanent structures to highest LEED standards wherever possible.

**B6-7  
Cont.**

**B6-8**

**B6-9**

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- We support comments provided by the Puente Hills Native Habitat Authority on this draft regarding the potential impact to wildlife and native vegetation. Impacts to the two nearby Significant Ecological areas (SEAs) must be minimized. **B6-10**
- Mitigation B-3 indicates that prior to issuance of a grading permit, the County shall prepare a landscaping plan for the Proposed Project. The plant palette will be derived from the existing Sanitation District approved palette for the landfill. In the past, eucalyptus and pampas grass have been used by the Sanitation District. Many are allergic to pampas grass and eucalyptus trees are a fire hazard. If these species are currently included, they must not be used for park landscaping. **B6-11**
- Impacts to the coastal California gnatcatchers must be avoided. This species has been observed on the project area and in adjacent locations. Surveys prior to any grading must be done during nesting and breeding seasons and if found, must be avoided. Any incidental take must be permitted by the United State Fish and Wildlife Service. The Rose Hills Road Alternative 2 or 3 is preferred so as to avoid impacts gnatcatchers and the adjacent Conceptual Significant Ecological Area (SEA). **B6-12**
- Up to 25 events are projected per year. Events must be limited to daytime hours. The noise, lighting and activities will have a negative impact on nocturnal animals. **B6-13**

## **Responses to Letter B6 – Sierra Club**

### **Response to Comment B6-1:**

This comment expresses Sierra Club's support for the Low Build Alternative. Comment has been noted.

### **Response to Comment B6-2:**

This comment expresses Sierra Club's opposition to the inclusion of zip-lines, slides, and the two bike skills areas because they would result in added traffic impacts. The comment has been noted. As detailed in the Draft PEIR in Section 2.5, the County of Los Angeles conducted an extensive master plan and public engagement process. This process revealed that the preferred design by the majority of the public engagement participants was a park for all users with a mix of active and passive recreational activities. The Proposed Project represents the park design that offers a balance between passive and active recreational facilities. Traffic impacts that would result from implementation of the Proposed Project were identified in Section 3.14 of the Draft PEIR and Mitigation Measures T-1 through T-6 were included to reduce traffic impacts to a less than significant level.

The comment also states that Sierra Club is concerned with the high cost of providing the infrastructure for zip-lines and slides and believes that such funding is better used for developing a more natural experience for urban dwellers. This comment has been noted.

The Sierra Club also has concerns of how concessions providing these services will be operated and the cost to users. This comment has been noted.

### **Response to Comment B6-3:**

This comment states that the Sierra Club believes that the lack of access from surrounding areas, particularly Hacienda Heights, will preclude easy use of the Proposed Project by many residents. Comment has been noted. There are three ways to access the Proposed Project. There are two hiking trail entrances which would be accessible by foot or mountain bikes from the east and west sides of the project site via the Schabarum-Skyline Trail. It would take approximately one hour to get onto the park property by foot from these trailheads. The Schabarum-Skyline Trail intercepts numerous trails in the Puente Hills which are accessible by Hacienda Heights residents. For improved access via the Schabarum-Skyline Trail the Proposed Project would include trailhead design, signage, wayfinding design, and implementation at the eastern entrance from the Habitat Authority Preserve Area, as stated in the Draft PEIR on page 2-45. For visitors entering the park by car, they would enter through the Puente Hills Landfill Park Entry Plaza and either park their car and take the trail lift to the highest point on the park site, or drive their car up and park in one of the small satellite parking lots. Off-site parking and shuttles are proposed to aid in the "car-free" vision of the future park. The trail lift would provide the opportunity for park visitors of all ages and physical abilities to ascend 760 feet to the highest elevation of the park to enjoy the scenic views at the overlook. The partially solar powered, environmentally friendly trail lift would effectively reduce the impact of single occupancy cars in the park and provide a transportation system option to access hilly, difficult to navigate terrain. Transit, cyclists, and pedestrians would be planned for, with a multi-use trail

connecting the main entry to the top of the park. Equestrians would trailer their horses to the Staging Area (Parking Lot E – Southern Deck) within the park and join multi-use trails.

**Response to Comment B6-4:**

This comment states that Canyons 2 through 8 must be connected to the Proposed Project from Hacienda Heights. The viability of land acquisition of the eastside canyons (Phase V of the Proposed Project) for trails and trailheads would be determined by the stakeholders they would serve.

**Response to Comment B6-5:**

This comment states that the presence of only one access point is problematic because large daytime gatherings are proposed. The Sierra Club also states that planning for shuttle routes must be included for such events. As stated in the response to comment B6-3 there would be three ways to access the Proposed Project. As discussed in the Draft PEIR on page 3.14-47, there would be up to 25 events per year of up to 5,000 people. To address impacts to the external and internal circulation systems during special events the Proposed Project includes Mitigation Measures T-2 and T-6, which would prohibit funeral processions during special events and require the preparation and implementation of a Traffic Management Plan (TMP). Shuttle would be provided during regular park operations and also during special events. Impacts remain less than significant.

**Response to Comment B6-6:**

This comment expresses the Sierra Club's concern about the single access road and the safety of visitors should an unexpected event such as a fire or methane explosion occur, particularly during special events of which could have up to 5,000 visitors.

Potential impacts from fire and methane explosions are discussed in the Draft PEIR in Section 3.8 Hazards and Hazardous Materials. The Sanitation Districts has developed an Emergency Action/Fire Protection Plan for potential emergencies such as fire, explosions, accidents, and earthquakes. Contingencies for fires and explosions related to the methane collection system are included in this plan. As part of the Joint Power Agreement (JPA) between the Sanitation Districts and the DPR, a similar emergency action plan would be developed for the park use that would include the roles of park staff, evacuation routes, and communication protocols in the event of an emergency. Impacts related to emergency access on the shared loop road are discussed in the Draft PEIR Section 3.14 Transportation and Circulation pages 3.14-53 through 3.14-58. As stated in the Draft PEIR, depending on the type and severity of the emergency and subsequent evacuation procedures, if the main entry is blocked ingress and egress at the street end of Orange Grove and up the Eastern Canyon, either at Canyon 4 or 5, could service park emergencies as a second option. The Proposed Project also includes the implementation of Mitigation Measure T-5 which would help maintain emergency access and minimize potential conflicts with park users. Furthermore, to address the safety of visitors during special events the Proposed Project includes Mitigation Measure PS-1. Mitigation Measure PS-1 would require the special event operator to coordinate with the Los Angeles County Fire Department (LAFCD) and develop a Fire Incident Plan.

**Response to Comment B6-7:**

This comment states that the Sierra Club does not agree with the planned phasing over a long period of time (70 years). The Sierra Club states that trails and native plantings on the Eastern and Southern Decks could be started along with Phase I projects. The Proposed Project could potentially have many different phasing programs that would meet the constraints of the settling landfill, including the phasing program suggested by the Sierra Club. However, the phasing program developed by the County and presented in Section 2.8 of the Draft PEIR was developed to not only meet the constraints of settling landfill but also to meet safety requirements, budget constraints, and aid in the transition of managing the closed landfill in conjunction with the Sanitation Districts.

The comment also states that to meet CEQA requirements for Phases IV through VI an additional CEQA document must be prepared. Additional CEQA document would be prepared, if needed, for projects analyzed at the program level.

**Response to Comment B6-8:**

This comment expresses Sierra Club's support for the use of native planting whenever possible to enhance habitat within the wildlife movement corridor. The comment also includes a suggestion that the Proposed Project should include a demonstration garden where gardeners could purchase plants for their own homes. Comment has been noted.

**Response to Comment B6-9:**

This comment states that all picnic tables should be covered due to the high temperatures common in the region. This comment also states that in consideration of traffic projections presented in the Draft PEIR overpasses for pedestrians and wildlife would be a welcomed addition. This comment also stated that Sierra Club supports the construction of all permanent structures to the highest LEED standards wherever possible. These comments have been noted.

**Response to Comment B6-10:**

This comment expressed support for the comments provided by the Puente Hills Habitat Preservation Authority on the Draft PEIR regarding the potential impact to wildlife and native vegetation. Comment has been noted. Responses to Letter A2 – Puente Hills Habitat Preservation Authority are provided in this Final PEIR.

**Response to Comment B6-11:**

This comment states that the park's landscaping should not include pampas grass or eucalyptus trees because many people are allergic to pampas grass and eucalyptus trees pose a fire hazard. Comment has been noted.

**Response to Comment B6-12:**

This comment states that impacts to California gnatcatchers must be avoided. Impacts to this species are discussed in the Draft PEIR on page 3.4-30, in the response to Comment A2-3 in

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Letter A2 – Puente Hills Habitat Preservation Authority, and Letter A8 – United States Fish and Wildlife Service.

**Response to Comment B6-13:**

This comment states that special events must be limited to daytime hours due to the negative impacts the noise, lighting, and activities would have on nocturnal animals. The special events included under the Proposed Project would occur during daylight hours.

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**Letter B7 - Amigos de los Rios**



August 8, 2016

Ms. Julie Yom, Park Planner  
County of Los Angeles  
Department of Parks and Recreation  
510 S. Vermont Ave  
Los Angeles, CA 90020

Dear Ms. Yom:

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
DRAFT ENVIRONMENTAL IMPACT REPORT**

Thank you for the opportunity to review the Puente Hills Park Master Plan Draft Environmental Impact Report (DEIR). We strongly support the Proposed Project as described and analyzed in the DEIR. We agree with the DEIR that the Proposed Project is the environmentally superior alternative, would result in beneficial impacts to recreation, aesthetics, and open space, and meet all of the project objectives detailed in the DEIR, particularly balancing the needs of the overall region along with the complex site constraints and the competing needs and interests of the adjacent entities.

The Proposed Project at the Puente Hills Landfill will transform the closed Puente Hills Landfill into a "Park for All" which fills a critical need for parkland in the region, and offers diverse, healthy and active outdoor recreational experiences and programming for all. Outdoor recreational activities will include hiking, biking and equestrian multi-use trails, nature play, bike skills areas, fitness programs, dog park, zip lines, art installations and performances. Plantings will emphasize native vegetation including sweeping coastal sage scrub, wildflowers and grasslands. Picnic and open play areas will be ideal for family gatherings. Panoramic views will highlight the San Gabriel Mountains National Monument and regional landmarks.

The Proposed Project will also offer educational programs focusing on the following issues: sustainable living, getting to zero waste, natural and cultural history of the San Gabriel Valley, native wildlife and habitat, landfill history and innovation. In addition, volunteer programs and a native plant nursery will offer visitors numerous ways to get involved with the park.

We participated in many of the workshops and outreach activities regarding the Proposed Project. The Proposed Project has incorporated and reflects the input we provided during the public participation process. Thank you for listening to us and giving us opportunities to be a part of this important planning effort to create the next regional park in Los Angeles County.

Sincerely,

A handwritten signature in black ink that reads "Claire Robinson".

Claire Robinson,  
Managing Director

908 E Altadena Drive, Altadena CA 91001 • tel 626.791.1611 • fax 626.791.1771 • [www.amigosdelosrios.org](http://www.amigosdelosrios.org)

**B7-1**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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**Letter B8 - Bike San Gabriel Valley**



*BikeSGV's mission is to support a more bicycle-, pedestrian- and transit-friendly San Gabriel Valley.*

**Bike San Gabriel Valley**  
Jeff Seymour Center  
10900 Mulhall St.  
El Monte, CA 91731  
[www.bikeSGV.org](http://www.bikeSGV.org)

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August 8, 2016

Ms. Julie Yom  
County of Los Angeles Department of Parks and Recreation  
Planning Division  
510 S. Vermont Avenue, Room 201  
Los Angeles, CA 90020

**RE: Support for the Puente Hills Landfill Park Master Plan**

Dear Julie Yom,

On behalf of Bike San Gabriel Valley (BikeSGV), I am writing to underline our support for the Puente Hills Landfill Park Master Plan.

BikeSGV's mission is to support a more bicycle, pedestrian and transit-friendly San Gabriel Valley and we represent over 8,000 community members in the San Gabriel Valley. BikeSGV is excited by the Puente Hills Landfill Park Master Plan's inclusion of elements such as wildlife corridors, open space, a nature center, public art, fitness stairs, bike skills features, a concert area, recreational trails, and playgrounds in the proposed park plan. BikeSGV is particularly supportive the proposed inclusion of multi-use trails and a bicycle skills park, amenities that youth, families, and visitors of all ages and backgrounds will be able to actively or passively enjoy.

Convenient access to parks and open spaces has been shown to improve community health and well-being. Unfortunately, many communities in the San Gabriel Valley lack adequate park space. For example, the nearby communities of Avocado Heights, Bassett, El Monte, La Puente, Montebello, South El Monte, and West Whittier are all considered park-poor. This lack of recreational space and amenities contributes to local health disparities such as obesity, diabetes, and poor mental health.

Due to the proximity of the Puente Hills to these communities and the proposed diverse mix of recreational opportunities, the Puente Hills Regional Park Master Plan has the potential to address some of the aforementioned community conditions by creating a regional park that is accessible for all.

BikeSGV staff looks forward to supporting the Los Angeles County Parks and Recreation Department's efforts to create more park space in the San Gabriel Valley. If you have any questions or require any additional information, please feel free to contact me at [wes@bikeSGV.org](mailto:wes@bikeSGV.org)

Sincerely,

Wesley Reutimann  
Executive Director  
Bike San Gabriel Valley

**B8-1**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter B9 - San Gabriel Mountains Forever**



August 8, 2016

County of Los Angeles Department of Parks and Recreation  
Planning Division  
510 S. Vermont Avenue, Room 201  
Los Angeles, CA 90020  
Attention: Julie Yorn, Park Planner

**RE: Puente Hills Landfill Park Master Plan- Draft Program Environmental Impact Report**

Dear Julie Yorn:

San Gabriel Mountains Forever is pleased to support the Puente Hills Landfill Park Master Plan.

San Gabriel Mountains Forever is a diverse partnership of residents, cities, local business owners, faith and community leaders, health and environmental justice organizations, and recreation and conservation groups working to permanently protect the San Gabriel Mountains and rivers. Our mission is to permanently protect the San Gabriel Mountains, work in local communities to build support for protection of, and increased access to, our forests, rivers and parks, and develop a new, diverse generation of environmental stewards to care for our public lands. Years of extensive community involvement, including public meetings, thousands of public comments, letters, and postcards have helped shape the coalition's vision for the future of the San Gabriel Mountains and rivers and the proclamation by President Obama establishing the San Gabriel Mountains National Monument on October 10, 2014.

The retirement of the Puente Hills Landfill provides us with a once-in-a-lifetime opportunity to transform a former eyesore into a world-class park for LA County residents. The proposed multi-use park would feature a wide variety of activities and elements – wildlife corridors, open space, environmental education installations, public art, fitness stairs, bike skills, concert space, recreational trails, playground space, and even a gondola – and serve residents of all ages and abilities. It would also provide unique recreational opportunities that currently cannot be found anywhere else in Los Angeles County, complementing and building upon the region's many great park and open spaces, including the San Gabriel Mountains. More importantly, the park would serve many high-need, park-poor communities that suffer from significant health disparities and lack access to these amenities.

**B9-1**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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If realized, the proposed park would be a true regional facility that would improve the quality of life for all, especially local children and families. As a result, the proposed park concept is strongly endorsed by San Gabriel Mountains Forever.

**B9-1  
Cont.**

Thank you for your time and consideration.

Sincerely,



Omar Gomez,  
Chair

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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**Letter B10 - San Gabriel Valley Conservation Corps**



SAN GABRIEL VALLEY  
CONSERVATION CORPS  
10900 Mulhall Street  
El Monte, CA 91731

Office (626) 579-2484 • Fax (626) 444-5339

August 8, 2016

Ms. Julie Yom, Park Planner  
County of Los Angeles  
Department of Parks and Recreation  
510 S. Vermont Ave  
Los Angeles, CA 90020

Dear Ms. Yom:

PUENTE HILLS LANDFILL PARK MASTER PLAN  
DRAFT ENVIRONMENTAL IMPACT REPORT

Thank you for the opportunity to review the Puente Hills Park Master Plan Draft Environmental Impact Report (DEIR). We strongly support the Proposed Project as described and analyzed in the DEIR. We agree with the DEIR that the Proposed Project is the environmentally superior alternative, would result in beneficial impacts to recreation, aesthetics, and open space, and meet all of the project objectives detailed in the DEIR, particularly balancing the needs of the overall region along with the complex site constraints and the competing needs and interests of the adjacent entities.

The Proposed Project at the Puente Hills Landfill will transform the closed Puente Hills Landfill into a "Park for All" which fills a critical need for parkland in the region, and offers diverse, healthy and active outdoor recreational experiences and programming for all. Outdoor recreational activities will include hiking, biking and equestrian multi-use trails, nature play, bike skills areas, fitness programs, dog park, zip lines, art installations and performances. Plantings will emphasize native vegetation including sweeping coastal sage scrub, wildflowers and grasslands. Picnic and open play areas will be ideal for family gatherings. Panoramic views will highlight the San Gabriel Mountains National Monument and regional landmarks.

The Proposed Project will also offer educational programs focusing on the following issues: sustainable living, getting to zero waste, natural and cultural history of the San Gabriel Valley, native wildlife and habitat, landfill history and innovation. In addition, volunteer programs and a native plant nursery will offer visitors numerous ways to get involved with the park.

We participated in many of the workshops and outreach activities regarding the Proposed Project. The Proposed Project has incorporated and reflects the input we provided during the public participation process. Thank you for listening to us and giving us opportunities to be a part of this important planning effort to create the next regional park in Los Angeles County.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeronimo Ortega", is written over a horizontal line.

Jeronimo "JJ" Ortega  
Environmental Program Manager  
San Gabriel Valley Conservation Corps  
[626 230-6220](tel:6262306220) Cell  
[626 899-4464](tel:6268994464) Desk  
[626 579-2484](tel:6265792484) Office  
[626 899-4422](tel:6268994422) Fax  
[jortega@sgvcc.org](mailto:jortega@sgvcc.org)

**B10-1**

*Building Dreams... Transforming Lives...*

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*Ride • Inform • Preserve*

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August 8, 2016

County of Los Angeles  
Department of Parks and Recreation Planning Division  
510 S. Vermont Avenue, Room 201  
Los Angeles, CA 90020  
Attention: Julie Yom, Park Planner

Re: Puente Hills Landfill Project

Dear Ms. Yom,

CORBA is an all-volunteer, member-based 501(c)(3) representing the interests of off-road cyclists throughout the greater Los Angeles area. We are passionate about preserving and expanding responsible mountain bike recreation opportunities on our public lands. I thank you and your staff for the opportunity to provide our full support for the proposed Puente Hills Landfill Park and related draft EIR.

We have been involved in the Puente Hills Landfill Park proposal development since its inception, and have been impressed by the professionalism by both the County staff and the Withers & Sandgren Landscape Architecture and Planning consultants carrying out the process.

On behalf of all CORBA members, we fully support the current proposal and its associated draft EIR. We are especially encouraged by the mix of conservation and recreation, including multi-use trails and bicycle skills park facilities. We see a growing demand for such facilities which are appearing all over the country, yet none exist in the Greater Los Angeles area as of August 2016.

We feel the proposed mitigations are adequate to balance recreational needs with habitat preservation and growth. This model project can set the standard for the re-purposing of the nation's many landfills. Already the Puente Hills Landfill has been a leader in this field, and the proposed park development will further that lead and set an example to be emulated around the country.

Again, thank you for the opportunity to express our support for this project and the current draft EIR.

Sincerely,

Steve Messer

**B11-1**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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President, Concerned Off-Road Bicyclists Association

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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community activist  
retired PUSD principal

**Letter B12 - Day One**

August 1, 2016

Attention: Julie Yom, Park Planner  
County of Los Angeles Department of Parks and Recreation  
Planning Division  
510 S. Vermont Avenue, Room 201  
Los Angeles, CA 90020

**Re: Support for a Multi-Use, Accessible Puente Hills Regional Park**

Dear Ms. Yom,

On behalf of Day One, I am writing to underline our support for a multi-use, multi-generational, regional park for all at the former Puente Hills Landfill.

Day One's mission is to build healthy, vibrant communities by advancing public health, empowering youth and igniting change. As a San Gabriel Valley-based non-profit organization with over two decades of experience in the realm of public health education, policy and environmental prevention, Day One recognizes the power of parks in promoting public health, community connections, economic development, and quality of life for residents of all ages and abilities.

The retirement of the Puente Hills Landfill provides us with a once-in-a-lifetime opportunity to transform a former eyesore into a world-class park for LA County residents. The proposed multi-use park would feature a wide variety of activities and elements – wildlife corridors, open space, nature center, public art, fitness stairs, bike skills, concert space, recreational trails, playground space, and even a gondola – and thus serve residents of all ages and abilities. It would also provide unique recreational opportunities that currently cannot be found anywhere else in Los Angeles County, complementing and building upon the County's great park and open spaces. More importantly, the park would serve adjacent high-need, park-poor communities that suffer from significant health disparities and lack access to these amenities.

If realized, the proposed park would be a true regional facility that would improve the quality of life for all, especially local children and families. As a result, the proposed park concept is strongly endorsed by Day One and its constituents.

Thank you for your time and consideration,

Christy Zamani  
Executive Director  
Day One, Inc.  
[christy@goDayOne.org](mailto:christy@goDayOne.org)

**B12-1**

*Day One builds vibrant, healthy cities by advancing public health, empowering youth, and igniting change.*

## **Responses to Letters B7 through B12**

### **Response to Comments B7-1 through B12-1:**

Thank you for your letter regarding the Puente Hills Landfill Park Master Plan Draft PEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. We look forward to your continued participation in the park planning process.

Some of the comment letters state that the Proposed Project would balance the needs of the overall region along with the complex site constraints and the competing needs and interests of the adjacent entities. The 25-mile service radius of the Proposed Project includes two of the fastest growing regions in the state: the Los Angeles metropolitan area and the Inland Empire. The park would be located in a park poor area, as stated in some of the comment letters. The new park would provide enhanced active and passive park and recreation opportunities for all users with an emphasis on public education, environmental stewardship, healthy living, and connections to nature. The Proposed Project has been planned for recreational activities that support a diverse population of all age groups equally from young children to seniors. The Proposed Project would provide the surrounding communities with a regional park destination created through a Master Plan process that blended several distinct park components and park objectives that emerged from the public/stakeholder participation process to shape the vision of the park.

### **3.3 CATEGORY C: GENERAL PUBLIC COMMENTS**

This section provides the responses to the comment letters in Category C: General Public.

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**Letter C1 - Don Moss**

August 7, 2016

Don C. Moss  
Avocado Heights Community Advocate  
P.O. Box 90094  
City of Industry, CA 91715-0094

Julie Yom, Park Planner  
County of Los Angeles  
Department of Parks and Recreation  
Planning Division  
510 S. Vermont Avenue, Room 201  
Los Angeles, CA 90020

Re: DEIR Puente Hills Landfill Regional Park

Dear Ms. Yom,

The planning process to date has produced a glaring inequity, an easement for Rose Hills cemetery funeral processions to use the Regional Park's access roadway. Observing this planning process from the beginning, it became painfully obvious that Parks Planning staff had absolutely no say regarding this outrageous park planning blunder.

Why were Parks Planners totally emasculated regarding this issue? The only answer can be that the top elected official overseeing this project, 4<sup>th</sup> District Supervisor Don Knabe, has applied undue job related pressure on the in-house Parks staff.

What has occurred to date is certainly unethical. The current plan, as advanced in the DEIR, is also a moral outrage to the residents of Los Angeles County. Further, the claims put forward in this DEIR that the negative impacts caused by this dual, incompatible, use are either unavoidable or reduced to minimal effect by the magical thinking advanced in the DEIR are outright untrue.

The Proposed Park Plan as presented in the DEIR is all about money. The SanDist made a deal with the residents of LA County to continue profitable operations at the landfill in exchange for a Regional Park when the landfill was closed. Later, the SanDist made a separate, independent deal with Rose Hills cemetery for encroachment rights on to the previously established buffer zone which further increased their profitability during the active life of the landfill. That back room deal which county residents were never aware of until now, agreed to supply an easement for funeral processions in exchange for the increased fill space. That deal did not specify use of the Regional Park access roads nor did the residents of the county ever agree to such an outrageous demand. Now, Don Knabe, the SanDist and Rose Hills are raising shystering to new levels by attempting to force dual use of the Regional Park access road so Rose Hills will not have to spend the money to build a road to separate funeral processions from the Regional Park experience.

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This is an egregious abuse of power which will negatively impact the health and welfare of Regional Park users in perpetuity. Further, the unnecessary added costs demanded by this plan will drain County Parks' operating budget requiring restrictive entry fees for park users which will destroy the accessibility of the park to the average LA County resident who needs affordable park access most.

The Board of Supervisors must back away from the traditional carte blanche allowed the supervisor whose district the project is in and do what is necessary to correct this travesty created by special interest politics now. Failure to adjust this plan now will put the full board in the untenable position of becoming a party to this grand malfeasance when the final plan comes before the Board for approval in a very short time.

Discussion points referring to the DEIR document follow:

**Section 2.0 - Project Description**

**2.1 – Project Location and Setting**

The last sentence of paragraph one should include "and other full vehicular access locations are available for consideration".

**C1-1**

**2.7.2.5 – Circulation, Internal Park Transportation and Parking**

**Rose Hills Memorial Park – Proposed Easement**

This document claims three (3) alternates are outlined for the proposed Rose Hills funeral processions easement. In fact, there is really only one route proposed with three different exit points. The proposed design irrevocably damages the park experience and must be changed. Three other options are immediately obvious and there may be more. Neighboring property owners can be negotiated with to obtain access through their properties also. One possibility is the northern access road for Rio Hondo College's upper level law enforcement training area. This access road directly connects to one of the points noted below in alternate number six (6) and would create an equally workable cemetery access for funeral processions without impacting the park users. The issue at hand, as pointed out above, is the cost of construction for a Rose Hills funeral procession access road which does not impact the Regional Park users.

**C1-2**

The planning process must be revisited to assure that there is no traffic conflict, at any time, between Rose Hills funeral processions and Regional Park users. All costs required to build separate roads, conflict separation bridges and other amenities required to move the funeral processions without impacting the Regional Park users must be borne by Rose Hills. This issue is clearly separate from the park planning fund which should not be used for any part of the for-profit needs of Rose Hills cemetery.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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Using this document's current numbering system, Rose Hills access road alternate number four (4) can enter a widened Crossroads Parkway entrance and follow an easterly arc around and below the fill. This alternate would cross over the Schabarum / Skyline Trail and Skyline Fire Road using a bridge so funeral processions will not negatively impact trail users or emergency responders, then enter Rose Hills at the closest point.

Rose Hills access road alternate number five (5) can enter Skyline Dr. from Turnbull Canyon Rd. This road can be constructed adjacent to but not encroaching on the Schabarum / Skyline Trail and the Skyline Fire Rd. This road must include bridges over any intersecting trails or fire roads so funeral processions will not negatively impact trail users or emergency responders, then enter Rose Hills at the nearest point. If such an access road encroaches somewhat on Puente Hills Habitat Authority holdings, there is no valid reason why that organization should not accommodate an action necessary to make the Regional Park viable for residents of the county.

Rose Hills access road alternate number six (6) can enter from Workman Mill Rd. just west of the MRF facility. This route can use existing SanDist roadway up to the Generation Plant. At the intersection of the loop road and Schabarum / Skyline Trail a bridge must be built for funeral processions to cross over the park access road(s) and the trail. Then a road adjacent to but not encroaching on the parallel road and trail can enter Rose Hills at the closest point.

**C1-2  
Cont.**

### Section 3.0 - Environmental Analysis

Overall, the environmental analyses herein glossed over or ignored the substantial environmental impacts affecting users of the Regional Park caused by Rose Hills cemetery funeral processions on the Regional Park's access roadway.

### 3.2 – Aesthetics

Funeral processions within the Regional Park destroy the ambiance of the park setting. Conversely, residents attempting to enjoy the park setting will destroy the decorum of the funeral processions. Rose Hills' commentary letter regarding the park planning process requested the Park Planners do what was necessary "... to respect the dignity and memorialization of the cemetery patrons ...". Yet, Rose Hills management intends to route funeral processions through an active Regional Park. Bringing further insult to injury, the dearly departed are being shuttled through the old dump. One wonders if Rose Hills is sharing that information with those purchasing cemetery properties.

**C1-3**

These negative impacts are avoidable by building a separate access road for Rose Hills funeral processions.

### 3.3 – Air Quality

#### 3.3.3 - Thresholds of Significance

**C1-4**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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Significant health impacts associated with poor air quality will result from the high volume of slow moving, idling cars in funeral processions emitting high levels of pollutants. All persons within the park will be negatively affected by the pollutants. Sensitive receptors of any age within the park area will suffer even more ill effects on their health.

**C1-4  
Cont.**

**3.3.4.5 – Odors**

The unnecessary accumulation of automotive exhaust emissions will result in objectionable odors for patrons of the Regional Park.

**C1-5**

**3.3.5 – Mitigation Measures**

The negative impact of high concentrations of automotive exhaust emissions on Air Quality is avoidable by building a road for funeral processions far enough away from the park area so that substantial dilution of the toxic exhaust emissions occurs before drifting into the park.

**C1-6**

**3.7 – Greenhouse Gas**

The high volume of greenhouse gas created by this project as designed is unnecessary.

The negative impact of concentrated greenhouse gas can be avoided by moving the Rose Hills funeral processions out of the Regional Park area. The Rose Hills access road deal was entirely separate from the Regional Park deal. As such, the Rose Hills access road must be a completely separate project.

**C1-7**

**3.8 – Hazards**

High volumes of concentrated traffic related to funeral processions creates an unnecessary hazard to Regional Park patrons. In the event of any type of emergency situation, including serious medical emergencies within the Regional Park and wild fires racing up the hills toward the access road, funeral processions will cause a tie up of major proportions on the Regional Parks access road. The resulting delays to the emergency responders is totally unacceptable. Those delays may result in loss of life.

The magical thinking presented within the mitigations section regarding this very real hazard is absolutely amazing in light of the fact that a detailed list of hazards involved with this aspect of the plan was outlined in the DEIR. Planners for this park must assume that the absolute worst scenario will happen and then design the park to truly eliminate those issues to the extent possible. One only has to recall a recent wild fire related fiasco where emergency responders stopped and held traffic on I-15. The emergency responders then forgot about that traffic, assuming that danger had been handled, only to have the wild fire overrun the freeway and burn dozens of cars. Things do go wrong, even in the hands of emergency responders. Do not actively design a very possible future catastrophe.

**C1-8**

The only true mitigation for such hazards is to build a completely separate roadway for the high volume, closely packed traffic of a Rose Hill funeral procession.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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**3.10 – Land Use**

The overlay of an easement for Rose Hills funeral processions on the Regional Park access road is an incompatible use of the land.

**C1-9**

The appropriate mitigation of the incompatible land uses is to move the Rose Hills access road away from the park access road.

**3.12 – Public Services**

Rose Hills funeral processions on the Regional Park access road will irrevocably damage the quality of public services which the park should provide. The quality of the park experience will be degraded. The major costs incurred by the County for the purpose of dealing with and coordinating the difficult traffic situations created by funeral processions through the park will require an unbearably high entrance fee to the park. This high entrance fee will destroy the functionality of the Regional Park, in perpetuity, for the people who need it most.

**C1-10**

The only mitigation for these impacts is to move the Rose Hills access road away from the Regional Park access road.

**3.13 – Recreation**

The quality of the recreation experience will be substantially degraded by Rose Hills funeral processions on the Regional Park access road. The problems and costs associated with this incompatible use will limit the availability of this park for the recreational use of the residents of Los Angeles County.

**C1-11**

The true mitigation for these negative impacts is to move the Rose Hills funeral processions to a separate road.

Submitted with substantial concern,



Don C. Moss  
Avocado Heights Community Advocate

Via: Email

C: BOS

## **Responses to Letter C1 – Don Moss**

### **Response to Comment C1-1:**

This comment suggests adding “and other full vehicular access locations are available for consideration” to the end of the first paragraph in Section 2.1 of the Draft PEIR. This section describes the project location and setting. Vehicular access, including emergency access, was part of the Master Plan process.

### **Response to Comment C1-2:**

Thank you for your comment. This comment is in reference to the proposed Rose Hills access road alignments. As stated on page 2-37 of the Draft PEIR, the 1999 Amended Setback and Easement Agreement between Rose Hills and the Sanitation Districts discusses a future roadway of ingress and egress by Rose Hills Memorial Park through the landfill area in perpetuity. The agreement also included that the location of the roadway easement would be subject to the master planning process for the future park. As such, the construction and operation of the roadway were included as part of the Proposed Project and analyzed on the Draft PEIR. The three alternative alignments were determined through the master planning process for the future park in coordination with the County of Los Angeles’ professional park planners. The Draft PEIR acknowledges that the proposed Rose Hills access road could affect the park experience and could result in potential traffic conflicts. Mitigation measures are included in Section 3.12, Public Services, and Section 3.14, Transportation and Circulation, of the Draft PEIR to address these conflicts.

### **Response to Comment C1-3:**

This comment shares concerns with having funeral processions within the proposed park and the effect on the ambience of the park setting and the converse effect on the decorum of the funeral processions. The use of the site by different user groups was taken into consideration as part of the Master Plan and the design of the park.

### **Response to Comment C1-4:**

This comment states that significant health impacts to park users would result from funeral processions and the emission of air pollutants. The operational impacts of the Proposed Project are included on page 3.3-21 of the Draft PEIR. Pollutant emission levels from mobile sources are included on Table 3.3-6. A discussion of local air quality impacts on sensitive receptors can be found in Section 3.3.4.4, Exposure to Sensitive Receptors, page 3.3-23 of the Draft PEIR.

### **Response to Comment C1-5:**

Odor impacts are discussed in Section 3.3.4.5, Odors, on page 3.3-27 of the Draft PEIR.

**Response to Comment C1-6:**

Comment noted. Construction and operation of the Proposed Project would comply with applicable South Coast Air Quality Management District rules and regulations as presented in Section 3.3.2.3 on pages 3.3-13 through 3.3-16 of the Draft PEIR.

**Response to Comment C1-7:**

This comment states that greenhouse gas impacts can be avoided by moving the Rose Hills funeral processions out of the regional park area. Greenhouse gas impacts are discussed in Section 3.7, Greenhouse Gas, starting on page 3.7-1 of the Draft PEIR and in Appendix B.

Please refer to the response to comment C1-2 regarding including the proposed Rose Hills access road as part of the Proposed Project.

**Response to Comment C1-8:**

The commenter states that the high volumes of traffic related to funeral processions would create an unnecessary hazard to park patrons. The comment raises further concerns with emergency access and delays from funeral processions. As stated in the comment, the Draft PEIR analyzes impacts from fire and emergency access; please refer to Sections 3.8, 3.12, and 3.14.

Given the many demands on the park entry, several ingress and egress road sites at the perimeter of the landfill would serve as emergency access points and shown on Figure 3.14-7 of the Draft PEIR. In the case of a park visitor emergency, first responders from the adjacent municipalities with emergency facilities in response to an emergency/evacuation situation range in distance from three to 13 miles from the park entry. In an emergency, all the bench roads within the landfill area, not open to the public, would be available for emergency vehicle use. Emergency vehicles (in unusual or extreme disaster situations) may be able to access the Puente Hills Material Recovery Facility area located on the former landfill site via the existing gated access road and/or a new internal off-street access road. The County would coordinate with Sanitation Districts and park staff to expedite emergency access. A County Animal Services Coordinator trained in disaster response, animal care, and animal rescue would be available if equestrians and their horses become part of an emergency or evacuation at the Puente Hills Landfill Park.

All counties of California have a local Office of Emergency Services (OES) to identify hazards and to prepare for, respond to, mitigate, and help recover from both large and small local incidents. The Los Angeles County Office of Emergency Management (OEM) is a coordinating agency that brings together local agencies to focus on unified responses to disaster. The existing main entrance off of Crossroads Parkway South and the entrance station area would serve as the primary emergency ingress and egress. Two additional ingress and egress sites on the west and south park boundaries include the Rio Hondo College entrance road and the Rose Hills Memorial Park road network. The most appropriate ingress and egress site would depend on the type and severity of the emergency and subsequent evacuation procedures. Ingress and egress at the street end of Orange Grove and up the Eastern Canyon either at Canyon 4 or

Canyon 5 could service park emergencies as a second option if the main entry is blocked by traffic, landslide, fire, or other emergency event requiring evacuation of park users.

If the degree of emergency intensifies to a site wide issue affecting the park and landfill, emergency aid and the County of Los Angeles Disaster Routes have been developed for the region. Guidance for such an emergency is to be structured to be consistent with the Standardized Emergency Management System (SEMS), the National Incident Management System (NIMS), and all relevant county, State, and Federal laws. Regulatory requirements for specific activities related to Puente Hills Landfill operations remain in effect post-closure. These include: 1) Emergency Action/Fire Prevention Plan (EAP), 2) Spill Prevention, Control, and Countermeasure Plan (SPCC), 3) Hazardous Materials Business Plan, and 4) Storm Water Pollution Prevention Plan (SWPPP) which contains a Liquid Discharge Emergency Response Plan for release of landfill liquids to surface water.

**Response to Comment C1-9:**

The comment states that an overlay of an easement for Rose Hills funeral processions on the park access road is an incompatible use. The commenter proposes that the Rose Hills access road be moved away from the park access road. This comment is noted.

**Response to Comment C1-10:**

This comment states that Rose Hills funeral processions on the park access road would damage the quality of public services for the park and degrade the park experience. The commenter is concerned with potential cost of traffic control and its possible effect on park entrance fees. Mitigation Measures in the public services and traffic sections of the Draft PEIR include a tri-party agreement between the County of Los Angeles, Rose Hills Memorial Park, and Sanitation Districts setting forth each of the parties rights and responsibilities for the construction, maintenance, and use of the access road. At this time the County has not determined entrance fees; this will be an ongoing process as the park is developed.

**Response to Comment C1-11:**

Please refer to the response to comment C1-3, C1-9, and C1-10. Thank you for sharing your comments and concerns during this process.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter C2 - Lee M. Willard**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); ["Jan Sandoren"](#); [Alfredo Aguirre](#)  
**Subject:** FW: Draft EIR for Puente Hills Landfill Park Master Plan Project - Lee Willard  
**Date:** Tuesday, August 09, 2016 12:34:24 PM

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Freddie,

Please see DEIR comments below.

**JULIE YOM, AICP**

County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

**From:** Lee Willard [mailto:willardtax@aol.com]  
**Sent:** Monday, August 08, 2016 5:39 PM  
**To:** Julie Yom <jyom@parks.lacounty.gov>  
**Cc:** jb123kelly@earthlink.com; agullo@habitatauthority.org; jennis39@gmail.com; hottpinkitty@gmail.com; claire@schlotterbeck.net  
**Subject:** Draft EIR for Puente Hills Landfill Park Master Plan Project - Lee Willard

Dear Ms Julie Yom,

The Habitat Authority authority has responded to you over signature of Michael Hughes, Vice Chair. President Jim Kelly has responded on behalf of Friends of the Whittier Hills (FOWH). I wish to submit personal comments from my experience of having hiked the hills for over 60 years and as a member of the FOWH board, volunteer with Habitat Authority, and supporter of Hills for Everyone which works diligently to maintain the wildlife corridor from Cleveland National Forest Northwest through the Puente Hills to Whittier Narrows.

FOWH dates back about 40 years and was an initiator/motivator for action to promote retention of the Puente Hills in their natural state for all time. Presently some 700 dues-paying members, including most Whittier area community leaders, continue advocacy for this preservation of our wealth in biological resources.

Then in conjunction with the Landfill authority and government conservation funding, the Habitat Authority came into being to plan for, control, and patrol a large portion of this land permanently preserving it for future generations. Habitat Authority has been the primary actionee for implementation of the plans and dreams we have had for years.

Response from Habitat Authority is highly detailed and comprehensive. It is fully

**C2-1**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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consistent with the view and objectives of FOWH and of my associates. It raises many issues that are a concern to us; we hope the County will give full consideration to the many points made. Please note that the lowest level of development for the Landfill Park is recommended by Habitat - a preference shared by FOWH and my associates.

**C2-1  
Cont.**

In order for this Authority to pursue its primary mission of preserving critical habitat, access must be controlled. I can remember a time only 15 or 20 years ago when hiking these hills the chances of meeting another hiker was only 50%. Now one sees from 10 to 100 individuals when traversing the same routes! Thus both the number of visitors and our recent dry years have already substantially degraded vegetation and opportunities for wildlife - jeopardizing the entire objective of preservation.

So now we must visualize how plans for the Landfill park interface with Habitat's current problems:

1. Low impact development of the landfill would enhance continuation of opportunities for wildlife and extend the wildlife corridor.
2. But if a number of additional visitors enter Habitat lands from the Schabarum Trail at the crest, biology of the area will be further degraded. Ranger services are limited due to restrictive funding, so additional visitors entering preserved habitat will cause further degradation.
3. One solution that would help greatly would be to re-designate some excess funding not needed for low impact park development for use by Habitat in providing rangers to police the anticipated additional visits to preserved lands. They are needed there to minimize use of unauthorized trails, lessen cutting of switchbacks, and limit visitor access to designated trails during daylight hours.

**C2-2**

Sincerely,

Lee Willard

Lee M Willard, EA, Colorado CPA, CMA, CFM  
Cal Real Estate Broker and Mortgage Loan Originator  
6218 Roundhill Drive, Whittier, CA 90601  
Phone 562-696-8740

**Beware of Tax Scams!**

**Visit "[Tax Scams and Consumer Alerts](#)" on IRS.gov to learn more.**

**Responses to Letter C2 – Lee M. Willard**

**Response to Comment C2-1:**

This comment references the Habitat Authority's comment letter on the Draft PEIR. Please refer to the responses to Letter A2 of this Final PEIR.

**Response to Comment C2-2:**

This comment states that access must be controlled per the Habitat Authority's primary mission of preserving critical habitat. The Proposed Project would provide both passive and active recreational opportunities with a main theme being environmental stewardship. Issues pertaining to the wildlife corridor are discussed in Section 3.4, Biological Resources, of the Draft PEIR starting on page 3.4-35. Direct and indirect impacts to trails are also discussed on Section 3.4. The comment regarding funding of a ranger to police the Puente Hills Preserve is noted.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter C3 - John Shubin**

August 4, 2016

PLANNING DIVISION  
AUG 08 2016 4:00 PM  
RECEIVED

Julie Yom, Park Planner  
County of Los Angeles  
Department of Parks and Recreation  
Planning Division  
510 S. Vermont Avenue, Room 201  
Los Angeles, CA 90020

Dear Ms. Yom:

This is to provide comments to the Draft Program Environmental Impact Report for the Puente Hills Landfill Park Master Plan dated June 24, 2016:

- 1) I would recommend that the "Low Build" alternative be selected as the preferred scope for this project as compared to the other project alternatives presented. I believe that the "Low Build" alternative will be less disruptive to the biological resources and be more consistent with the adjacent properties which have been preserved and/or restored for native habitat and minimal recreation, such as for hiking, biking, horse-back riding, etc.;
- 2) As mentioned above, I would discourage high impact uses that have been proposed, such as gondolas, zip-lines, slides, cafes, and other permanent structures;
- 3) I would recommend that the County consider extending the park, with a network of trails, that can be used by hikers, bicyclist, and horses, onto other areas of the landfill property, beyond the proposed pad area, into Canyons 1, 2, 4 and 5, so that there is a more global approach to the trail system. I believe this would increase access to the trail system and provide connectivity to the adjacent communities, such as the trail connections to Los Robles Avenue, Orange Grove and Skyline Drives;

**C3-1**

**C3-2**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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- |  |             |
|--|-------------|
| 4) I would recommend that the Schabarum Skyline trail system between the proposed park and Skyline Drive and Workman Mill Road, be considered for improvement so that the trail has designated paths for bicycles, hikers and horses.  | <b>C3-3</b> |
| 5) I would also request that the time frames for this project be expedited, in as much as possible, so that the surrounding communities can enjoy the positive outcomes of this project.   | <b>C3-4</b> |
| 6) Finally, I recommend that the County identify community stakeholders for this project so that we can continue a positive dialog between the County and the communities impacted by this project, as the project progresses with the design and implementation. Suggested stakeholder groups can include, Hacienda Heights Improvement Association (HHIA), Puente Hills Native Preservation Authority, Puente Hills Citizens Advisory Committee and Whittier Woods Home Association. | <b>C3-5</b> |

Thank you for the opportunity to comment on this Draft EIR.



John Shubin

Member, Puente Hills Native Preservation Authority  
Citizens Technical Advisory Committee

Member, Puente Hills *landfill*  
Citizens Advisory Committee

## **Responses to Letter C3 – John Shubin**

### **Response to Comment C3-1:**

This comment recommends the Low Build Alternative and discourages high impact uses. Comment noted.

### **Response to Comment C3-2:**

The commenter recommends that the Proposed Project include a greater network of trails beyond the proposed pad area, into Canyons 1, 2, 4, and 5. Phase V is proposed 41 to 50 years from now, and the viability of land acquisition of the eastside canyons for trails and trailheads would be determined by the stakeholders they would serve.

### **Response to Comment C3-3:**

This comment recommends improvements to the Schabarum-Skyline Trail between the proposed park and Skyline Drive and Workman Mill Road. Improvements, as appropriate, to the regional trail system will be considered.

### **Response to Comment C3-4:**

Major settling of the landfill decks would require phasing of park development over a 20 to 30 year period. A portion of Phase I park development would be concentrated on a 13-acre portion of the Western Deck (40 acres), which was one of the first areas to be filled and has settled over the longest period of time. It would be relatively stable and ready for development by approximately 2017 to 2019, but is expected to settle another 10 feet in the coming decades. The Eastern Deck (49 acres) and Southern Deck (28 acres) are not projected to be ready for major development for 20 to 30 years (approximately 2038 to 2048), when they have settled and become relatively stable. The internal trash from the past decades would decompose and settle, reducing the overall height of these two decks by as much as 120 feet over the next 30 years. Less intensive park development or activities that are adapted to settlement is feasible on the top decks of these areas in the interim.

### **Response to Comment C3-5:**

Thank you for your interest in the continued planning process for the Master Plan. The planning process for the Puente Hills Landfill Park Master Plan and EIR included input from a Technical Advisory Committee (TAC) comprised of multiple agencies, organizations, and local/regional stakeholders. The TAC has met five times on the following dates: 8/20/15, 9/24/15, 10/29/15, 1/21/16, and 6/23/16.

The following agencies and organizations participated in the TAC:

1. Los Angeles County Civic Arts Commission
2. Los Angeles County Department of Parks & Recreation, Planning & Development Agency
3. Los Angeles County Department of Regional Planning
4. Los Angeles County Department of Public Works

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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5. Los Angeles County Fire Department
6. Los Angeles County Sanitation Districts
7. Rio Hondo College
8. Rose Hills Memorial Park
9. Puente Hills Habitat Preservation Authority
10. Southern California Edison
11. Regional Water Quality Control Board, Los Angeles Region

It should also be noted that 18 stakeholder interviews were also conducted with the following:

1. SD-1 Board Office Staff
2. SD-4 Board Office Staff
3. Los Angeles County Sanitation Districts
4. Puente Hills Habitat preservation Authority
5. Rose Hills Memorial Park
6. Rio Hondo College
7. Hacienda Heights Improvement Association
8. Workman Mill Homeowner's Association
9. City of El Monte
10. City of Whittier
11. City of Industry
12. City of South El Monte
13. City of La Puente
14. Rivers and Mountains Conservancy/Watershed Conservation Authority
15. Equestrian Joint Council
16. Concerned Off-Road Bicyclist Association
17. Sierra Club
18. San Gabriel Mountains Forever

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
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**Letter C4 - Charles E. Lawrence**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); ["Jan Sandgren"](#); [Alfredo Aguirre](#)  
**Subject:** FW: Comment on Draft Program EIR  
**Date:** Tuesday, August 09, 2016 12:47:38 PM

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Freddie,

See comments below.

**JULIE YOM, AICP**  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

---

**From:** Charles Lawrence [mailto:[cel.arroyo@verizon.net](mailto:cel.arroyo@verizon.net)]  
**Sent:** Monday, August 08, 2016 6:55 PM  
**To:** Julie Yom <[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)>  
**Subject:** Comment on Draft Program EIR

Ms. Yom:

Please add my comments below; as my preference of the several Plan Alternatives:

My preference is for the lowest intensity development concept possible. The focus for the project should be for restoration back to native habitat to the greatest degree possible. This will be compatible with and compliment the adjacent lands of the Puente Hills Open Space Preserve. This is an opportunity not to be squandered. The flora and fauna of the Puente Hills Preserve should be protected and not adversely impacted. Most importantly, this will be the least expensive alternative for the taxpayers of Los Angeles County. The region already has a "Magic Mountain". There is no need for a "Magic Mountain East". But there is a need to restore the natural environment within the urban sea for the health and sanity of county residents and the natural environment. Such a restoration alternative would be a national case study on how decades of negative human impacts on the natural environment can be undone.

Thank you for the opportunity to comment on the park proposal.

--

*Charles E. Lawrence*  
*Arroyo Consulting*  
*P.O. Box 311 Whittier, CA 90608-0311*  
*562.695.4450 (O)*  
*562.743.1091 (C)*  
[cel.arroyo@verizon.net](mailto:cel.arroyo@verizon.net)

**C4-1**

**Responses to Letter C4 – Charles E. Lawrence**

**Response to Comment C4-1:**

Thank you for your comment on the Draft PEIR. The commenter prefers the lowest intensity development possible and states that there is a need to restore the natural environment. This comment is noted.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter C5 - Judy Ennis**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); [Kathline J. King](#); [Norma E. Garcia](#); ["Jan Sandgren"](#); [Alfredo Aquirre](#)  
**Subject:** FW: Draft EIR for Puente Hills Landfill Park Master Plan Project  
**Date:** Monday, August 08, 2016 3:08:27 PM

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Freddie,

Here is another support email.

JULIE YOM, AICP  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
Please note that our offices are closed on Fridays.

-----Original Message-----

From: Judith Ennis [<mailto:jennis39@gmail.com>]  
Sent: Monday, August 08, 2016 3:00 PM  
To: Julie Yom <[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)>; James Kelly Jr. <[jb123kelly@earthlink.net](mailto:jb123kelly@earthlink.net)>; Lee Willard <[willardtax@aol.com](mailto:willardtax@aol.com)>  
Subject: Draft EIR for Puente Hills Landfill Park Master Plan Project

Dear Ms. Yom:

Land, such as this, is scarce to design in perpetuity. Folks have many ideas...once I saw roundups on the Phillips Ranch and walked the Rincon Road, now the 91 Freeway. And once folks wanted a second golf course here in La Habra Heights, but removing earth that would line up dump trucks from here to Michigan would really have changed us! We are hills and mountains here in SoCal, and we need honor this. Nature has much to teach us, as what drought is doing to us all. Nature is the basis of beauty in all countries and needs be respected here in this Master Plan Project. This project needs reflect what once was here, for Nature has much to teach us about beauty and life.

**C5-1**

Thank you for this consideration!

Sincerely,

Judy Ennis

## **Responses to Letter C5 – Judy Ennis**

### **Response to Comment C5-1:**

Thank you for providing your comment on the Draft PEIR. Environmental stewardship, education, and connections to nature are key components of the Master Plan. This comment is noted.

### **3.4 CATEGORY D: PUBLIC MEETING COMMENTS**

This section provides the responses to the comments received during the public meeting on June 29, 2016.

PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

Letter D1 - Andrew Yip



Puente Hills Landfill  
PARK MASTER PLAN



**COMMENTS: Draft Program Environmental Impact Report**

Please use this page to submit your comments on the information presented in the Draft Program Environmental Impact Report (PEIR) prepared for the Puente Hills Landfill Park Master Plan Project. Your comments are an important part of the CEQA process. When making your comments, please be as specific as possible.

Name

Andrew Yip

Address

1102 Jarrow Ave. Hacienda Hts., 91745

Street

City

Zip Code

E-mail

Andrew.f.yip@gmail.com

**Comments:**

For more space, please use the reverse side of this sheet. *Please write legibly.* All comments must be received by **August 8, 2016** to be considered in the Final PEIR.

Why are funeral processions going through the park? That's a lot of cars especially on holidays. I think it's dangerous and needs to be limited.

D1-1

Gondola / Trail lift is important. I have family and friends with disabilities.

D1-2

Bike pump track/skills - Build it!

**Comments can also be submitted to:**

Julie Yom  
County of Los Angeles  
Department of Parks and Recreation  
510 South Vermont Ave.  
Los Angeles, CA 90020

Email: [jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
Phone: (213) 351-5127  
Fax: (213) 639-3959

## **Responses to Letter D1 – Andrew Yip**

### **Response to Comment D1-1:**

This comment is concerned with funeral processions through the park. The proposed Rose Hills Memorial Park access road is part of an Amended Setback and Easement Agreement between the Sanitation Districts and Rose Hills Memorial Park, which provides for a future roadway easement for ingress and egress by Rose Hills Memorial Park through the landfill area. The permanent alignment of the roadway easement is subject to the master planning process for the future park and therefore included as part of the Proposed Project and analyzed in the Draft PEIR.

### **Response to Comment D1-2:**

This comment expresses support for the trail lift and bike skills area. This comment is noted.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

**Letter D2 - Diane Velez**



**Puente Hills Landfill  
PARK MASTER PLAN**



**COMMENTS: Draft Program Environmental Impact Report**

Please use this page to submit your comments on the information presented in the Draft Program Environmental Impact Report (PEIR) prepared for the Puente Hills Landfill Park Master Plan Project. Your comments are an important part of the CEQA process. When making your comments, please be as specific as possible.

**Name** Diane Velez

**Address** 4645 cutter Ave Baldwin Park 91706

**E-mail** velezdiane@gmail.com

Street City Zip Code

**Comments:**

For more space, please use the reverse side of this sheet. *Please write legibly.* All comments must be received by **August 8, 2016** to be considered in the Final PEIR.

- How will greenhouse gasses be reduced, if above the threshold?

**D2-1**

- Will Native/Tribal Tongva peoples be involved in the creation/outreach...their land before anyone elses.

**D2-2**

**Comments can also be submitted to:**

Julie Yom  
County of Los Angeles  
Department of Parks and Recreation  
510 South Vermont Ave.  
Los Angeles, CA 90020

Email: [jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
Phone: (213) 351-5127  
Fax: (213) 639-3959

## **Responses to Letter D2 – Diane Velez**

### **Response to Comment D2-1:**

This comment asks how greenhouse gases would be reduced if they are above the threshold. The Draft PEIR includes five mitigation measures in Section 3.7, Greenhouse Gas, page 3.7-19 to reduce impacts related to greenhouse gas.

### **Response to Comment D2-2:**

This comment asks whether the Native American tribes would be involved in the creation and outreach for the project. The Los Angeles County Department of Parks and Recreation has consulted with the Gabrieleño Band of Mission Indians-Kizh Nation (Kizh Nation). The Draft PEIR includes Mitigation Measures TCR-1 and TCR-2 to reduce impacts to tribal cultural resources to a less than significant level.

PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

Letter D3 - Amy Wong



Puente Hills Landfill  
PARK MASTER PLAN



COMMENTS: Draft Program Environmental Impact Report

Please use this page to submit your comments on the information presented in the Draft Program Environmental Impact Report (PEIR) prepared for the Puente Hills Landfill Park Master Plan Project. Your comments are an important part of the CEQA process. When making your comments, please be as specific as possible.

Name

Amy Wong

Address

3310 Jastre Avenue El Monte CA 91733

E-mail

amyjwong1@gmail.com

Comments:

For more space, please use the reverse side of this sheet. *Please write legibly.* All comments must be received by **August 8, 2016** to be considered in the Final PEIR.

I support the multi-modal access to the park - ~~includes~~ <sup>elderly (ADA accessible route)</sup> for including pedestrians, bicyclists, equestrians <sup>into</sup> ~~into~~ <sup>access</sup> ~~access~~. Do not support the shared use of roads w/ Rose Hills funeral procession - will add traffic to park.

D3-1

Comments can also be submitted to:

Julie Yom  
County of Los Angeles  
Department of Parks and Recreation  
510 South Vermont Ave.  
Los Angeles, CA 90020

Email: [jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
Phone: (213) 351-5127  
Fax: (213) 639-3959

### **Responses to Letter D3 – Amy Wong**

#### **Response to Comment D3-1:**

This comment expresses support of the multi-modal access to the park and does not support the shared use of the park road with Rose Hills Memorial Park funeral processions. This comment is noted.

PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

Letter D4 - Myca Tran



Puente Hills Landfill  
PARK MASTER PLAN



**COMMENTS: Draft Program Environmental Impact Report**

Please use this page to submit your comments on the information presented in the Draft Program Environmental Impact Report (PEIR) prepared for the Puente Hills Landfill Park Master Plan Project. Your comments are an important part of the CEQA process. When making your comments, please be as specific as possible.

Name

MYCA TRAN

Address

4324 CENTER ST, BALDWIN PARK, CA 91706

Street

City

Zip Code

E-mail

MTRAN@APIOPA.ORG

**Comments:**

For more space, please use the reverse side of this sheet. *Please write legibly.* All comments must be received by **August 8, 2016** to be considered in the Final PEIR.

I do not support building a road through the park that would connect to the Rose Hills Cemetery. The amount of cars regularly going through the park would counter the health benefits of the space.

D4-1

**Comments can also be submitted to:**

Julie Yom  
County of Los Angeles  
Department of Parks and Recreation  
510 South Vermont Ave.  
Los Angeles, CA 90020

Email: [jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
Phone: (213) 351-5127  
Fax: (213) 639-3959

## **Responses to Letter D4 – Myca Tran**

### **Response to Comment D4-1:**

This comment does not support the construction of the access road through the park to connect to Rose Hills Memorial Park. The commenter is concerned with the amount of cars and public health. This comment is noted.

PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

Letter D5 - Robert Tsang



Puente Hills Landfill  
PARK MASTER PLAN



**COMMENTS: Draft Program Environmental Impact Report**

Please use this page to submit your comments on the information presented in the Draft Program Environmental Impact Report (PEIR) prepared for the Puente Hills Landfill Park Master Plan Project. Your comments are an important part of the CEQA process. When making your comments, please be as specific as possible.

Name

ROBERT TSANG

Address

1576 MEADOW GLEN WAY HH 91745

Street

City

Zip Code

E-mail

erqe - alphala@yahoo.com

**Comments:**

For more space, please use the reverse side of this sheet. *Please write legibly.* All comments must be received by **August 8, 2016** to be considered in the Final PEIR.

AS MAY 16, 2016 TOP 10 PRIORITY PROJECTS 7-10,  
IT SHOULD BE COMBINED AS ONE TO  
REPAIR INFRASTRUCTURE / GENERAL AT "ALL"  
LOCAL HH PARKS.

D5-1

**Comments can also be submitted to:**

Julie Yom  
County of Los Angeles  
Department of Parks and Recreation  
510 South Vermont Ave.  
Los Angeles, CA 90020

Email: [jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
Phone: (213) 351-5127  
Fax: (213) 639-3959

**Responses to Letter D5 – Robert Tsang**

**Response to Comment D5-1:**

This comment is noted.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

**Letter D6 - Lee M. Willard**



**Puente Hills Landfill  
PARK MASTER PLAN**



**COMMENTS: Draft Program Environmental Impact Report**

Please use this page to submit your comments on the information presented in the Draft Program Environmental Impact Report (PEIR) prepared for the Puente Hills Landfill Park Master Plan Project. Your comments are an important part of the CEQA process. When making your comments, please be as specific as possible.

Name LEE M WILLARD  
Address 6218 ROUNDAILL DR. WHITTIER, CA 90601  
Street City Zip Code  
E-mail WILLARDTAX@AOL.COM

**Comments:**

For more space, please use the reverse side of this sheet. *Please write legibly.* All comments must be received by **August 8, 2016** to be considered in the Final PEIR.

TONIGHT I REPRESENT "FRIENDS OF WHITTIER HILLS"  
AS VICE PRESIDENT. THIS ORGANIZATION HAS BEEN  
PROMOTING PRESERVATION OF THE HILLS IN A NATURAL  
STATE FOR THE PAST 40 YEARS, AND ITS MEMBERS  
INCLUDE MOST OF THE IMPORTANT LEADERS OF WHITTIER  
AND SURROUNDING COMMUNITIES. I ALSO RETAIN CLOSE  
TIES WITH HILLS FOR EVERYONE, & WITH THE HABITAT  
AUTHORITY (AS VOLUNTEER DOGENT AND TRAIL WATCH).

(COMMENTS - REVERSE)

**Comments can also be submitted to:**

Julie Yom  
County of Los Angeles  
Department of Parks and Recreation  
510 South Vermont Ave.  
Los Angeles, CA 90020

Email: [jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
Phone: (213) 351-5127  
Fax: (213) 639-3959

COMMENTS

I & MY ASSOCIATES FEEL STRONGLY, WITH THIS NEW COUNTY REGIONAL PARK AS AN EXTENSION OF THE PUENTE HILLS TO ITS WESTERNMOST EXTREMITY, THAT IT BE LIGHTLY DEVELOPED AS AN EXTENSION OF THE HABITAT NATURAL AREA AND THE WESTERNMOST TERMINUS OF THE WILDLIFE CORRIDOR THAT CURRENTLY ~~EXTENDS~~ EXTENDS NORTH FROM THE PACIFIC OCEAN THROUGH THE EXPANSIVE CLEVELAND NATIONAL FOREST, ACROSS TO CHANDLER HILLS STATE PARK, AND IN A HUGE ARC OVER TO THIS NEW PARK.

FURTHER LIGHT DEVELOPMENT WITH EMPHASIS ON TRAILS AND EXTENSION OF WILDERNESS WOULD BE FAR MORE FAVORABLE FOR ENHANCEMENT OF WILDLIFE AND BE AMENABLE TO THE MANY YEARS OF EXTENSIVE GROUND SETTLEMENT WHICH WOULD CAUSE EXTENSIVE PROBLEMS WITH MOST OTHER IMPROVED UTILIZATIONS.

Lee McLean, VP, FOWA  
Volunteer, Habitat Authority

D6-1

**Responses to Letter D6 – Lee M. Willard**

**Response to Comment D6-1:**

This comment states that the new regional park should be lightly developed as an extension of the habitat natural area and wildlife corridor. The comment further states that light development would be more favorable for enhancement of wildlife. The Proposed Project includes habitat enhancement to support wildlife movement. This comment is noted.

### **3.5 CATEGORY E: SUPPORT COMMENTS**

This section provides responses to the comment letters in Category E. Support letters were also received from agencies and organization and are included in their respective categories. The support letters in Category E are from the general public. A master response is provided for Letters E1 through E18.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter E1 - Adam Corranza**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); [Kathline J. King](#); [Norma E. Garcia](#); ["Jan Sandgren"](#); [Alfredo Aquirre](#)  
**Subject:** FW: Proposed Project  
**Date:** Monday, August 08, 2016 1:56:06 PM

---

Freddie,

Here is another a support letter.

**JULIE YOM, AICP**  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

**From:** Adam C. Carranza [<mailto:adam.carranza@gmail.com>]  
**Sent:** Monday, August 08, 2016 12:37 PM  
**To:** Julie Yom <[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)>  
**Subject:** Proposed Project

Greetings Julie,

I would like to weigh in on the proposed project that is the Puente Hills Park.

I have heard from my residents that are seeking opportunities to visit more local park and recreational spaces.

Puente Hills has an opportunity to engage the SGV region and provide family space for the surrounding cities. Outdoor spaces increases the opportunity for more physical activity which local reports indicate is sorely lacking in our region as evident by many health disparities.

I want to lend my voice on behalf of the families in El Monte and South El Monte to have this park built on behalf of the SGV region.

Warm Regards,

Adam Carranza  
President  
Mountain View Board of Education

**E1-1**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter E2 - Albert M. Sotelo**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); ["Jan Sandgren"](#); [Alfredo Aguirre](#); [Norma E. Garcia](#); [Kathline J. King](#)  
**Subject:** FW: Draft PEIR Comments  
**Date:** Monday, August 08, 2016 3:58:39 PM

---

Freddie,

Here is another support email.

JULIE YOM, AICP  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
Please note that our offices are closed on Fridays.

-----Original Message-----

From: Albert Sotelo [<mailto:albertsotelo@yahoo.com>]  
Sent: Monday, August 08, 2016 3:54 PM  
To: Julie Yom <[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)>  
Subject: Draft PEIR Comments

Dear Ms. Yom,

I am writing you today to express my full support of the proposed Puente Hills Landfill Park plan. As a lifelong San Gabriel Valley resident, I think the proposed park is a major step in the right direction for helping provide much-needed, outdoor park space for the community. I especially believe that using an old landfill site is an ingenious way of turning an eyesore into something the entire community can use.

At a time when the county is seeing major over-development of commercial and residential space, there is a void for green-space and park-space where children can play, seniors can go for walks, and citizens can find an escape from the endless urban sprawl.

I sincerely hope LA County pushes forward with this ambitious plan.

Sincerely,

Albert M. Sotelo

Albert M. Sotelo  
3157 N. Bartlett Ave.  
Rosemead, CA 91770  
(323) 456-5302  
e-mail: [albertsotelo@yahoo.com](mailto:albertsotelo@yahoo.com)

**E2-1**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter E3 - Amy J. Wong**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); [Norma E. Garcia](#); [Kathline J. King](#); ["Jan Sandgren"](#); [Alfredo Aquirre](#)  
**Subject:** FW: Draft PEIR Cpmments  
**Date:** Monday, August 08, 2016 5:01:08 PM

---

Freddie,

Here is another support email.

**JULIE YOM, AICP**  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

**From:** Amy Wong [<mailto:amyjwong1@gmail.com>]  
**Sent:** Monday, August 08, 2016 4:18 PM  
**To:** Julie Yom <[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)>  
**Subject:** Draft PEIR Cpmments

Hi there,

I'd like to express my support for the Puente Hills Landfill Park Master Plan.

I am Amy Wong, coordinator for San Gabriel Mountains Forever, and an El Monte resident. I am supportive of more open space for our communities, especially considering that the San Gabriel Valley is made up of largely low-income park-poor communities of color. The Puente Hills Landfill Park would create much-needed green space for everyone across LA County to provide health and recreational benefits to all.

**E3-1**

The major concern I have with the draft PEIR is the concept of having cars/limo traffic (due to the Rose Hills vehicles) on the roads in the park. To mitigate GHG emissions, I strongly encourage the County to not let those funeral procession cars go through the park. It would create traffic, endanger childrens' safety (having constant traffic there on the weekends), increase the amount of GHG, all of which would go against the vision of creating a "Park for All". Please reconsider this part of the plan. GHG emissions is the only category of the plan that presents a credible danger- please do not compromise the park experience and potential to be the next High Line or Central Park, a must-visit destination for locals and tourists. This park will help put the SGV on the map and we cannot compromise our communities' health and safety.

**E3-2**

I still strongly support the Puente Hills Landfill Park and am excited to see innovative features like a dog park, bike skills park, gondola, and more incorporated into the park. Thank you.

**E3-3**

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**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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Best,  
Amy J. Wong

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter E4 - Desiree Harbaugh**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); [Norma F. Garcia](#); [Kathline J. King](#); ["Jan Sandgren"](#); [Alfredo Aquirre](#)  
**Subject:** FW: DRAFT PEIR Comments - Puente Hills Landfill Master Plan  
**Date:** Monday, August 08, 2016 1:54:18 PM

---

Freddie,

Here is another a support letter.

**JULIE YOM, AICP**  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

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**From:** Desiree Harbaugh [mailto:[ddnorris@earthlink.net](mailto:ddnorris@earthlink.net)]  
**Sent:** Monday, August 08, 2016 1:02 PM  
**To:** Julie Yom <[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)>  
**Subject:** DRAFT PEIR Comments - Puente Hills Landfill Master Plan

I fully support the continued development of the Puente Hills Landfill Park.

I am most excited about the nature play area, hiking, biking, gathering, and educational experiences that will be developed. Connecting people to the natural environment is critical.  
I am excited about the possibility that this could be another incredible Field Trip destination for schools within Los Angeles County.

Please continue the development of this PARK FOR ALL, and bring this wonderful open space to our region!

Sincerely,

Desiree Harbaugh  
230 Andre Street, Monrovia, CA

**E4-1**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter E5 - Florencio Briones**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); [Kathline J. King](#); [Norma E. Garcia](#); ["Jan Sandgren"](#); [Alfredo Aquirre](#)  
**Subject:** FW: Puente Hills Park Project  
**Date:** Monday, August 08, 2016 1:54:11 PM

---

Freddie,

Here is another a support letter.

JULIE YOM, AICP  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
Please note that our offices are closed on Fridays.

-----Original Message-----

From: Florencio Briones [<mailto:florenciobriones@mac.com>]  
Sent: Monday, August 08, 2016 1:10 PM  
To: Julie Yom <[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)>  
Subject: Puente Hills Park Project

Dear Mrs. Yom,

I am writing to you in support of the proposed project at the former Puente Hills Landfill. As a resident of El Monte and the eastern San Gabriel Valley, I know there is a lack of park space in my community, especially in lower income areas. The proposed project will bring much needed open space to residents of the valley.

**E5-1**

Please take this email as a message of strong support for the proposed project.

Sincerely,

Florencio Briones  
El Monte Resident

# PUENTE HILLS LANDFILL PARK MASTER PLAN FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

## Letter E6 - Fritz Dannenberg

**From:** Julie Yom  
**To:** Freddie Olson  
**Cc:** Clement Lau; Michelle O'Connor; Kathline Z. King; Norma E. Garcia; "Jan Sandgren"; Alfredo Aguirre  
**Subject:** FW: [paa-club] [Action Alert] Support the Puente Hills Regional Park inc. Bike Park and Trail Access - Deadline for Comments Today!  
**Date:** Monday, August 08, 2016 1:58:36 PM

Freddie,

Here is another a support letter.

**JULIE YOM, AICP**  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

**From:** Frits Dannenberg [mailto:fdannenberg@live.nl]  
**Sent:** Monday, August 08, 2016 1:57 PM  
**To:** Julie Yom <jyom@parks.lacounty.gov>  
**Subject:** Fwd: [paa-club] [Action Alert] Support the Puente Hills Regional Park inc. Bike Park and Trail Access - Deadline for Comments Today!

To the LA County officials,

Members of the Pasadena Athletic Association (PAA) are asked to speak up in favor of the development of the Puente Hills Regional Park, including the Bike Park.

As a non-permanent resident, academic post-doctoral scholar living in the Pasadena area, and PAA member, I would like to speak in favor of the Bike Park development at the Puente Hills. I greatly welcome more cycling-friendly infrastructure, and recreational bike-friendly parks in particular. The appeal of Los Angeles will greatly benefit from these developments and, if available, I would certainly attend these, especially given the current scarcity of dedicated cycling trails and routes.

I cannot emphasize enough the joy of cycling, both for commuting and recreational purposes, and the health benefits that are associated with cycling, as well as the obvious air-quality benefits. Los Angeles is a great city that will grow tremendously over the coming years and decades, and I hope that cycling will be part of that future.

Best wishes,

Frits Dannenberg, DPhil (oxon)

----- Forwarded Message -----

**Subject:** [paa-club] [Action Alert] Support the Puente Hills Regional Park inc. Bike Park and Trail Access - Deadline for Comments Today!  
**Date:** Mon, 8 Aug 2016 12:09:07 -0700  
**From:** Wes @ BikeSGV <[wes@bikessgv.org](mailto:wes@bikessgv.org)>  
**To:** PAA Bike Club <[paa-club@googlegroups.com](mailto:paa-club@googlegroups.com)>

Hi all,

TODAY is the final day comments may be submitted for the proposed Puente Hills Regional Park, which would include the County's first bicycle skills park and multi-access biking/hiking trails, among other amenities, if approved! However, this will only happen if the cycling community speaks up and supports the proposal!

Today is the last day for public comment on the EIR for the Proposed Puente Hills Regional Park.

**Submit Comments to:** [jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)

**Proposed Features:**

- Hiking/Biking Trails
- Bike Skills Park (inc. beginner, intermediate, advanced features)
- Fitness stair climb
- Scenic overlooks
- Nature Education Center
- Concert/event area

**More info**

Board Letter Outlining the

Project: [http://static1.squarespace.com/static/554abf7ce4b00c750a7ce232/576c3771d482e9c2ed143d28/1466709874173/NOA\\_NOC\\_PHL\\_PMP\\_6-24-16.pdf](http://static1.squarespace.com/static/554abf7ce4b00c750a7ce232/576c3771d482e9c2ed143d28/1466709874173/NOA_NOC_PHL_PMP_6-24-16.pdf)

E6-1

## PUENTE HILLS LANDFILL PARK MASTER PLAN FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

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BikeSGV Bike Park petition: <https://www.change.org/p/hilda-solis-don-knabe-create-a-bike-park-and-trail-system-at-puente-hills-landfill-park>

BikeSGV blog post about the park and design process: <http://www.bikesgv.org/news/landfill-to-park-visioning-underway-in-the-sgv-future-site-of-la-countys-first-bike-park>

Thank you!!!

--

You received this message because you are subscribed to the Google Groups "Pasadena Athletic Association" group.

To unsubscribe from this group and stop receiving emails from it, send an email to [paa-club+unsubscribe@googlegroups.com](mailto:paa-club+unsubscribe@googlegroups.com).

To post to this group, send email to [paa-club@googlegroups.com](mailto:paa-club@googlegroups.com).

Visit this group at <https://groups.google.com/group/paa-club>.

To view this discussion on the web visit [https://groups.google.com/d/msgid/paa-club/CAN-BUGaVzGTFxF0qiObITPdNQG69\\_AyhYvqnDN%3D9X7cKu9pmA%40mail.gmail.com](https://groups.google.com/d/msgid/paa-club/CAN-BUGaVzGTFxF0qiObITPdNQG69_AyhYvqnDN%3D9X7cKu9pmA%40mail.gmail.com).

For more options, visit <https://groups.google.com/d/optout>.

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter E7 - James Wei**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); [Norma E. Garcia](#); [Kathline J. King](#); ["Jan Sandgren"](#); [Alfredo Aquirre](#)  
**Subject:** FW: Puente Hills Regional Park  
**Date:** Monday, August 08, 2016 5:02:37 PM

---

Freddie,

Here is another support email.

**JULIE YOM, AICP**  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

---

**From:** James Wei [<mailto:wannabfast@yahoo.com>]  
**Sent:** Monday, August 08, 2016 4:22 PM  
**To:** Julie Yom <[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)>  
**Subject:** Puente Hills Regional Park

I would like to voice my opinion of supporting the creation of the Puente Hills Regional Park for all users to enjoy. This would include hiking, horse riding, and biking (on pavement and dirt trails).

A quick weekend visit to the nearby regional park can confirm that many many people are out enjoying the open space (Schabarum..Turnbull Canyon...etc) and developing a healthy living habit. This additional park will provide additional space for the surrounding communities.

I have lived in the Hacienda Heights area from early '80's for 20+ years. Now i live in Arcadia which and continue to drive pass 60/605 interchange often. This is the best thing we can do to re-use and redevelop the land once was a "trash hill". Give it back to the communities and perhaps also include some environmental educational exhibit for the future generation to minimize the need for more "trash hill".

James Wei

**E7-1**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter E8 - Jennifer Mata**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); [Norma E. Garcia](#); [Kathline J. King](#); ["Jan Sandgren"](#); [Alfredo Aquirre](#)  
**Subject:** FW: Park for all  
**Date:** Monday, August 08, 2016 1:54:44 PM

---

Freddie,

Here is another a support letter.

**JULIE YOM, AICP**  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

**From:** Jennifer Mata [<mailto:jmata@monroviashschools.net>]  
**Sent:** Monday, August 08, 2016 12:48 PM  
**To:** Julie Yom <[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)>  
**Subject:** Park for all

I think it would be a great idea to have the park if it is environmentally safe. There are not enough nature parks around this area.  
Jennifer Mata

**E8-1**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter E9 - Jimmy Tang**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); ["Jan Sandgren"](#); [Alfredo Aguirre](#)  
**Subject:** FW: Puente Hills Landfill development  
**Date:** Monday, August 08, 2016 11:57:32 AM

---

Freddie,

Below is a support email received from a resident.

**JULIE YOM, AICP**  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto: jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

**From:** Jimmy Tang [mailto:tangjimmy.94@gmail.com]  
**Sent:** Monday, August 08, 2016 11:55 AM  
**To:** Julie Yom <jyom@parks.lacounty.gov>  
**Subject:** Puente Hills Landfill development

Dear Ms. Yom,

I am a resident of the Los Angeles County and Monterey Park and would like to voice my support for the addition of family and community resources to the Puente Hills Landfill park. I frequently go to parks with family and friends and feel this would be a great addition and opportunity for my family and for families across the County to become more engaged with a public resource. My younger sister is going to be entering the fifth grade -- adding these features to the park as opposed to leaving it as a plain park would give her and her school community a chance to become interested in engaging with nature and staying active. Thank you for taking my voice into consideration.

**E9-1**

Best,  
Jimmy

--  
**Jimmy Tang**  
Tel: (626) 236-8604

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter E10 - Maria Morgan**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); [Norma E. Garcia](#); [Kathline J. King](#); ["Jan Sandgren"](#); [Alfredo Aquirre](#)  
**Subject:** FW: In support of the Puente Hills Landfill Park  
**Date:** Monday, August 08, 2016 1:56:35 PM

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Freddie,

Here is another a support letter.

**JULIE YOM, AICP**  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

**From:** Maria Morgan [<mailto:mmorgan@emcsd.org>]  
**Sent:** Monday, August 08, 2016 12:25 PM  
**To:** Julie Yom <[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)>  
**Subject:** In support of the Puente Hills Landfill Park

Dear Julie Yom,

I am writing to express my support of the Puente Hills Landfill Park project. As a longtime resident of El Monte, employee of my local elementary school district, and a Board Trustee of El Monte Union High School District, I know that our communities are in need of parks.

When I think of how West Covina transformed the landfill on Azusa Ave. (I lived in West Covina for 5 years off of Aroma Drive), and reflect on the beautiful hiking and biking trails of Bonelli Park, I can see the possibilities of this project. I also love the educational component that will teach visitors about nature, native wildlife and habitat, and sustainable living. It will bring much enjoyment and education to the many families and visitors that will use it.

Looking at the plan, I know that the final product may or may not be completed in my lifetime, however, I know that it will benefit many future generations to come. This project is a MUST in our community.

Please forward my words of support for the Puente Hills Landfill Park project to all that have the ultimate decision making power. I hope they will consider my support.

Thank you,  
Maria Morgan  
El Monte Resident, Employee of El Monte City School District,  
El Monte Union High School District Board of Trustee, Clerk

**E10-1**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter E11 - Nancy Lara**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); [Norma E. Garcia](#); [Kathline J. King](#); ["Jan Sandgren"](#); [Alfredo Aquirre](#)  
**Subject:** FW: Support our park  
**Date:** Monday, August 08, 2016 2:55:39 PM

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Freddie,

Here is another support email.

**JULIE YOM, AICP**  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

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**From:** Nancy Lara [<mailto:nlara@usc.edu>]  
**Sent:** Monday, August 08, 2016 2:54 PM  
**To:** Julie Yom <[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)>  
**Subject:** Support our park

Hello  
My name is Nancy Lara and I live in the avocado heights area.

I have lived in this area for 15 years. When the waste by rail project from the Sanitation District started to implement its programs for the communities; from then to now; a lot of their promises were changed to satisfy their agenda.

The Park is something I have been looking forward to for my children.  
I never thought the community would have to show support for an initiative we have been awaiting for our children.

I have two small sons. My older two children I had to drive to Montebello for them to be involved in after school activities like football and cheer.

My older children were involved for over 10 years at Montebello park.

Now my younger two children have been traveling to Baldwin park for sports.

This park will bring back a community. This park can start healthy measures for our children with recreational sports and activities. Allowing our children to deter from gangs and graffiti in our neighborhood. Parks and communities unite for these children to keep them safe.

This park can bring more business to our area. Perhaps more jobs.

**E11-1**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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My children and I have been looking forward to this park.

Please don't take another measure away from our children in our neighborhood.

Thank you  
Nancy Lara  
[nlara@usc.edu](mailto:nlara@usc.edu)  
323-442-3370

Thank you  
Nancy Lara  
HSC Payroll Specialist  
University Payroll Services  
[nlara@usc.edu](mailto:nlara@usc.edu)  
323-442-3370

**E11-1  
Cont.**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter E12 - Jeanette Flores**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); [Kathline J. King](#); [Norma E. Garcia](#); ["Jan Sandgren"](#); [Alfredo Aquirre](#)  
**Subject:** FW: Letter of support for proposed project  
**Date:** Tuesday, August 09, 2016 12:37:57 PM

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Freddie,

Another support email below.

**JULIE YOM, AICP**  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto: jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

**From:** Jeanette Flores [mailto:jeanettevflores@gmail.com]  
**Sent:** Monday, August 08, 2016 6:26 PM  
**To:** Julie Yom <jyom@parks.lacounty.gov>  
**Subject:** Letter of support for proposed project

Dear Ms. Yom,  
I am writing to you in support of the proposed project for the Puente Hills Landfill. As you know, our communities continue to suffer from poor public health outcomes and limited green space particularly in under resourced neighborhoods. The San Gabriel Valley deserves a park that will not only provide green space for physical activity but will also serve a place for families to congregate and enjoy the outdoors. I urge you to keep the proposed plan for a large, expansive park that will support our children and families for years to come. Please feel free to contact me should you have questions.

**E12-1**

Thank you,  
Jeanette Flores, MPA  
Charter Oak Unified School District  
Board Member

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter E13 - Lawrence Shih**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); [Kathline J. King](#); [Norma E. Garcia](#); ["Jan Sandgren"](#); [Alfredo Aquirre](#)  
**Subject:** FW: Support for Proposed Project  
**Date:** Tuesday, August 09, 2016 12:48:25 PM

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Freddie,

Another support email below.

**JULIE YOM, AICP**  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

**From:** lawrence [mailto:lawrenceshih1@gmail.com]  
**Sent:** Monday, August 08, 2016 11:03 PM  
**To:** Julie Yom <jyom@parks.lacounty.gov>  
**Subject:** Support for Proposed Project

Hello,

I wanted to take this opportunity to express my strong support for the Proposed Project of the Puente Hills Park Master Plan. I believe the Proposed Project is best for our community, by balancing the needs for a recreational area with the needs of limiting the environmental impacts of the area.

The San Gabriel Valley needs a wonderful facility like the one being proposed, and I hope that our input is taken as we go forward.

Best,

Lawrence Shih

**E13-1**

# PUENTE HILLS LANDFILL PARK MASTER PLAN FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

## Letter E14 - Augusto Sarmiento

**From:** Julie Yom  
**To:** Freddie Olmos  
**Cc:** Clement Lau; Michelle O'Connor; Kathline J. King; Norma E. Garcia; Jan Sandgren; Alfredo Aguirre  
**Subject:** FW: [paa-club] [Action Alert] Support the Puente Hills Regional Park inc. Bike Park and Trail Access - Deadline for Comments Today!  
**Date:** Tuesday, August 09, 2016 12:35:21 PM

Freddie,

Another support email below-

**JULIE YOM, AICP**  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

**From:** Gus Sarmiento [mailto:gussarm@gmail.com]  
**Sent:** Monday, August 08, 2016 5:47 PM  
**To:** Marie Campbell <mcampbell@sapphosenvironmental.com>; Julie Yom <jyom@parks.lacounty.gov>  
**Subject:** Re: [paa-club] [Action Alert] Support the Puente Hills Regional Park inc. Bike Park and Trail Access - Deadline for Comments Today!

**Proposed Features:**

- Hiking/Biking Trails
- Bike Skills Park (inc. beginner, intermediate, advanced features)
- Fitness stair climb
- Scenic overlooks
- Nature Education Center
- Concert/event area

I am sending this note in support of more and improved Biking, hiking trails and events . The proposed features listed above in my opinion are worthy of strong positive consideration and expansion. These features all help promote improved health among all ages of folks (giving our younger population more options for positive activities and healthy things to do in our community and not focused on any specific segment - which is great and hard to often find these days. There are plenty of Ball parks in our cities and to few of these others listed which really does hit a broader segment of residents. the first on the list I would suggest highlighting as a priority and largest benefit overall.

Please support these features as a strong step in helping our future and growth. We need more outdoor and affordable places to go, versus so many indoor options with much higher overhead cost associated with them.

Sincerely

Augusto Sarmiento

On Mon, Aug 8, 2016 at 1:12 PM, Marie Campbell <mcampbell@sapphosenvironmental.com> wrote:

All should be aware that there is also a proposal for adoption of a County Trails Plan for Castaic that includes a Bike Skills Park. The County has received comments from LADWP and local residents discourage approval of the project. Equestrians, hikers, and mountain bikers who support trail development should make their support known to the County of Los Angeles 5<sup>th</sup> Supervisorial District and to the Department of Parks and Recreation.

**Marie Campbell**  
President  
Sapphos Environmental, Inc.  
430 North Halstead Street  
Pasadena, CA 91107  
Tel. (626) 683-3547 ext. 103  
Fax: (626) 683-3548  
[mcampbell@sapphosenvironmental.com](mailto:mcampbell@sapphosenvironmental.com)  
[www.sapphosenvironmental.com](http://www.sapphosenvironmental.com)  
WBE/MBE/DBE/SBE/CBE Certified

**From:** wesleyreutimann@gmail.com [mailto:wesleyreutimann@gmail.com] On Behalf Of Wes @ BikeSGV  
**Sent:** Monday, August 08, 2016 12:09 PM  
**To:** PAA Bike Club  
**Subject:** [paa-club] [Action Alert] Support the Puente Hills Regional Park inc. Bike Park and Trail Access - Deadline for Comments Today!

Hi all,

TODAY is the final day comments may be submitted for the proposed Puente Hills Regional Park, which would include the County's first bicycle skills park and multi-access biking/hiking trails, among other amenities, if approved! However, this will only happen if the cycling community speaks up and supports the proposal!

Today is the last day for public comment on the EIR for the Proposed Puente Hills Regional Park.

**Submit Comments to:** [jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)

**E14-1**

# PUENTE HILLS LANDFILL PARK MASTER PLAN

## FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

### Proposed Features:

- Hiking/Biking Trails
- Bike Skills Park (inc. beginner, intermediate, advanced features)
- Fitness stair climb
- Scenic overlooks
- Nature Education Center
- Concert/event area

### More Info

Board Letter Outlining the

Project: [http://static1.squarespace.com/static/554ab7cefb00e750a7ce232/U/576c3771d482e9c2ed143d28/1466709874173/NOA\\_NOC\\_PHLMPMP\\_6-24-16.pdf](http://static1.squarespace.com/static/554ab7cefb00e750a7ce232/U/576c3771d482e9c2ed143d28/1466709874173/NOA_NOC_PHLMPMP_6-24-16.pdf)

BikeSGV Bike Park petition: <https://www.change.org/p/hilda-solis-don-knabe-create-a-bike-park-and-trail-system-at-puente-hills-landfill-park>

BikeSGV blog post about the park and design process: <http://www.bikesgv.org/news/landfill-to-park-visioning-underway-in-the-sgv-future-site-of-la-county-s-first-bike-park>

Thank you!!!

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You received this message because you are subscribed to the Google Groups "Pasadena Athletic Association" group.

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Augusto 'Gus' Sarmiento

[gussam@gmail.com](mailto:gussam@gmail.com)

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter E15 - Kathy Leal**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Clement Lau](#); [Michelle O'Connor](#); [Kathline J. King](#); [Michelle O'Connor](#); ["Jan Sandgren"](#); [Alfredo Aquirre](#)  
**Subject:** FW: Puente hills landfill park  
**Date:** Tuesday, August 09, 2016 12:37:12 PM

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Freddie,

Another support email below.

**JULIE YOM, AICP**  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

**From:** kathy leal [mailto:[kaathhhyy@gmail.com](mailto:kaathhhyy@gmail.com)]  
**Sent:** Monday, August 08, 2016 6:09 PM  
**To:** Julie Yom <[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)>  
**Subject:** Puente hills landfill park

Dear Julie,  
My name is Kathy Leal and I am a resident of Pico Rivera, a student at Rio Hondo Community College, and a parent of three children. I am emailing you in the support of the proposed project of the Puente hills landfill park. I think the project would be a great opportunity for my children and myself to enjoy. I hope you take my comments into consideration.  
Sincerely, Kathy Leal

**E15-1**

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter E16 - Enrique Huerta**

August 8, 2016

Enrique Huerta  
At-Large Stakeholder  
Downey, CA 90242

County of Los Angeles  
Department of Parks and Recreation  
Planning Division  
510 South Vermont Avenue, Room 201  
Los Angeles, CA 90020  
Attention Julie Yom, Park Planner  
Delivered via e-mail: [jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)

RE: PUBLIC COMMENT ON THE NOTICE OF COMPLETION AND AVAILABILITY FOR THE DRAFT  
ENVIRONMENTAL IMPACT REPORT (DEIR) FOR PUENTE HILLS LANDFILL PARK MASTER PLAN  
(PHLPMP) PROJECT

Dear Ms. Yom:

Thank you for the opportunity to comment on the DEIR for the PHLPMP. As a resident of the City of Downey, located approximately eight miles away, and a parent of two children, I appreciate and fully support the need for a distinctive regional park destination. This DEIR provides reasonable assurance that incorporating mitigation measures would reduce most of the potential impacts to an insignificant level. I fully support the proposed project and believe that its location within two of the densest, most populated areas of Los Angeles County-- the San Gabriel Valley and the Gateway Cities-- will have a beneficial outcome to some of the most park-poor areas of Los Angeles County.

First we shape our landscapes and in turn, they shape us. These words were uttered by Winston Churchill, a great visionary who left a legacy of open space that Great Britain is known for the world over. It is time for Los Angeles County residents to view this place as becoming a beautiful monument to the future that will improve the quality of life for generations to come. Our future depends on landscapes, like the proposed project, that fulfill multiple objectives while mitigating impacts associated with its design, construction, operation, and maintenance. Thank you in advance for your time and consideration.

**E16-1**

Sincerely,

Enrique Huerta

**PUENTE HILLS LANDFILL PARK MASTER PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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**Letter E17 - Hacienda Heights Residents**

July 28, 2016

County of Los Angeles Department of Parks and Recreation  
Planning Division  
510 S. Vermont Avenue, Room 201  
Los Angeles, CA 90020  
Attention: Julie Yom, Park Planner

Re: Support for Puente Hills Landfill Park Master Plan

Julie Yom:

We, the undersigned, are in support of the Puente Hills Landfill Park Master Plan.

We recently discovered that the Hacienda Heights Improvement Association (HHIA) has asked that the Puente Hills Landfill Project be scaled back. Many of these projects and ideas were developed at several workshops where residents from communities near the Puente Hills Landfill attended. We want to make sure that the voices of Hacienda Heights residents are heard. Although HHIA does great work, we want to be clear that many Hacienda Heights residents participated in the community workshops and provided input on the Puente Hills Landfill Park Project. We believe that the ideas and discussions by our community members is reflected in the current park design plan as revealed at the previous workshop on November 10th, 2015.

Many San Gabriel Valley cities lack adequate parks and open space. For example, a community would be considered park poor (less than 3 acres per 1,000 residents) and many communities fit that definition. This project is an opportunity to help bridge the gap. Furthermore, this project is intended for use by generations to come and to 'tone' down such a project does not increase access. We understand that the plan will be implemented by a measured approach and all the proposed infrastructure will be vetted by proper environmental studies and authorities. The Puente Hills will not become another amusement park rather, it's going to catch up with the rest of the country and the rest of the world in becoming a premier open space for all in a park poor region.

We, as residents of Hacienda Heights urge the Los Angeles County Department of Parks and Recreation to listen to the needs of the community. Many of us already attended the workshops and have voiced our input. Our hope is that our recommendations and needs won't be put on the backburner. We believe that conservation and recreation can go hand in hand. Puente Hills Parks will still be a passive park regardless of the amenities when you consider the acreage and the amount of amenities. As a result, we do not believe that the amenities in the proposed

**E17-1**

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project will change the passive qualities of the park (since a majority of the land cannot be built on). What we're hoping for is a park that can accommodate all peoples and be a resource that our community can enjoy.

We as residents of Hacienda Heights support the current Preferred Park Concept plan as presented at the November 10th workshop in Hacienda Heights.

The Undersigned,  
Andrew Fung Yip  
1102 Jarrow Avenue, Hacienda Heights, CA 91745

Philip Hong Yip  
1102 Jarrow Avenue, Hacienda Heights, CA 91745

Wing Ching Yip  
1102 Jarrow Avenue, Hacienda Heights, CA 91745

May Ling Lo  
1102 Jarrow Avenue, Hacienda Heights, CA 91745

Ying Ye Lo  
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Emilie Chen  
16176 Mesa Robles Drive, Hacienda Heights, CA 91745

Katie Wooldridge  
1733 Lardwood Avenue, Hacienda Heights, CA 91745

Eddie Rios  
1733 Larchwood Avenue, Hacienda Heights, CA 91745

Clara Chia  
2807 Pietro Drive, Hacienda Heights, CA 91745

Irene Chia  
2807 Pietro Drive, Hacienda Heights, CA 91745

Mercy Chia  
2807 Pietro Drive, Hacienda Heights, CA 91745

**E17-1  
Cont.**

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Estevan DeGuzman  
1404 9th Avenue, Hacienda Heights, CA 91745

Paul Sanchez  
16540 Inyo Street, La Puente, CA 91744

Katia Tyra  
15269 Los Altos Drive, Hacienda Heights, CA 91745

Barnabus Ng  
1414 Gayland Avenue, Hacienda Heights, CA 91745

Ana Maritza Rivera  
15247 Binney Street, Hacienda Heights, CA 91745

Rio Rivera  
15247 Binney Street, Hacienda Heights, CA 91745

Melissa Supamongkol  
1108 Ameluxen Avenue, Hacienda Heights, CA 91745

Jasmine Serna  
Hacienda Heights, CA 91745

Tiffany Lua  
Hacienda Heights, CA 91745

Jenaro, Elvira, Lizbeth Hernandez  
15349 Ringer Place, Hacienda Heights, CA 91745

Rosa A. Lopez  
1149 Farmstead Ave, Hacienda Heights, CA 91745

Juan, Silvia and Diana Lopez  
Walbrook Dr, Hacienda Heights, CA 91745

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**Letter E18 - Carlos Sanchez**

**From:** [Julie Yom](#)  
**To:** [Freddie Olmos](#)  
**Cc:** [Michelle O'Connor](#); [Clement Lau](#); [Jan Sandaren](#); [Alfredo Aquino](#)  
**Subject:** FW: Landfill Grand Park  
**Date:** Thursday, August 11, 2016 7:35:07 AM

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Good morning Freddie,

Here is another support email.

Thanks!

**JULIE YOM, AICP**  
County of Los Angeles  
Department of Parks and Recreation | Planning Division  
510 South Vermont Avenue  
Los Angeles, CA 90020  
Tel. 213) 351-5127 | Fax 213) 639-3959  
[jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov)  
*Please note that our offices are closed on Fridays.*

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**From:** Carlos Sanchez [mailto:avv70@yahoo.com]  
**Sent:** Tuesday, August 09, 2016 7:01 PM  
**To:** Julie Yom <jyom@parks.lacounty.gov>  
**Subject:** Landfill Grand Park

I strongly support the Landfill Grand Park project.

Please look favorably on the great plan

The Park would be a much needed recreational facility for this area and the surrounding communities

Respectfully,

Taxpayer

Carlos Sanchez

**E18-1**

## **Responses to Letters E1 through E18**

### **Response to Comments E1-1 through E18-1 (except E3-2):**

Thank you for your letter regarding the Puente Hills Landfill Park Master Plan Draft PEIR expressing support for the Proposed Project. The Los Angeles County Department of Parks and Recreation (DPR) appreciates your thoughtful consideration of the Proposed Project and the key issues. We look forward to your continued participation in the park planning process.

As referenced in several of the comment letters, the Proposed Project would meet the diverse needs of Los Angeles County and the San Gabriel Valley. The new park would provide enhanced active and passive park and recreation opportunities for all users with an emphasis on public education, environmental stewardship, and connections to nature. The 25-mile service radius of the Proposed Project includes two of the fastest growing regions in the state: the Los Angeles metropolitan area and the Inland Empire. The park would be located in an area of historically underserved minority populations, as stated in several of the comment letters. The Proposed Project has been planned for recreational activities that support all age groups equally from young children to seniors. The Proposed Project would provide the surrounding communities with a regional park destination created through a Master Plan process that blended 6 distinct park components and 12 park objectives (as listed below) that emerged from the public/stakeholder participation process to shape the vision of the park:

1. Provide connections to nature
2. Provide ways for people to be healthy and active
3. Provide active sports facilities
4. Provide access
5. Alleviate pressures on the existing Puente Hills trails
6. Provide gateways to environmental stewardship

<b>PROJECT OBJECTIVES</b>	
<b>1. Park For All</b>	Develop a "Park For All" that offers diverse, healthy, passive, and active recreational experiences and programming for visitors of all ages, abilities, interests and backgrounds.
<b>2. Unique Regional Destination</b>	Develop a regional destination park which uniquely reflects the site's history, urban-wildland location, scale and topography.
<b>3. Range of Recreation and Outdoor Fitness</b>	Develop a range of active and passive amenities to meet varied recreational demands and provide outdoor fitness opportunities to help address national trends related to inactivity, obesity and nature-deficit disorder.
<b>4. Gateway to Nature for Diverse New Audiences</b>	Attract diverse, new audiences, particularly underrepresented or disadvantaged populations, to inspire connection to outdoor activities, nature, and environmental stewardship.
<b>5. Integrated Recreation and Habitat</b>	Integrate active recreational facilities with natural habitats to enhance and sustain both the recreational and ecological functions of the park.
<b>6. Wildlife Habitat Connectivity</b>	Promote and support wildlife movement and habitat connectivity through the Puente Hills Significant Ecological Area (SEA), the Rio Hondo College Wildlife Sanctuary SEA and the San Gabriel River.

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<b>PROJECT OBJECTIVES</b>	
<b>7. Environmental Sustainability</b>	Demonstrate environmentally sustainable design and practices.
<b>8. Multi-modal and Universal Accessibility</b>	Provide multi-modal, universal access and circulation into and through the park to the extent feasible.
<b>9. Education and Interpretation</b>	Incorporate design elements for education and interpretation on the park's unique landfill history and natural environmental features.
<b>10. Captivating Trail Experience</b>	Provide a captivating trail experience within the park which also alleviates the overuse and degradation of the adjacent trail network.
<b>11. Public Health, Safety and Landfill Operations</b>	Balance development of park facilities with landfill maintenance activities to protect public safety, water quality and meet the Sanitation Districts' regulatory requirements.
<b>12. Balance Multiple Objectives</b>	Balance multiple project objectives in a manner that considers the complex site constraints, park needs of the overall region, and the competing interests and needs of adjacent entities.

**Response to Comment E3-2:**

Comments E3-1 and E3-3 express support for the Proposed Project and are addressed above. Comment E3-2 expresses concerns with Rose Hills funeral processions on the park road and greenhouse gas emissions. Impacts from the funeral processions through the park have been addressed throughout the Draft PEIR. We understand your concern and have included mitigation measures to reduce impacts to a less than significant level. Greenhouse gas impacts would however remain significant and unavoidable.

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## SECTION 4.0

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### REVISIONS TO THE DRAFT PEIR

#### 4.1 INTRODUCTION

Evaluation of the comments submitted on the Draft PEIR impact analysis determined that the comments received did not require additional evaluation or changes to the conclusions reached, or alternatives to the Proposed Project. Changes or clarifications to the Draft PEIR were made in response to some of the comments to the Draft PEIR.

These changes and clarifications are provided in this section of the Final PEIR as errata to the text in the Draft PEIR. None of the changes contain significant new information that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the Proposed Project or a feasible way to mitigate or avoid such an effect. All of the information added to the Final PEIR merely clarifies, amplifies, or makes insignificant modifications in the Draft PEIR. Therefore, recirculation of the Draft PEIR is not required (see CEQA Guidelines Section 15088.5).

#### 4.2 DRAFT PEIR ERRATA

1. **Table 1-1, Anticipated Agency Approvals and Reviews**, on page 1-2 of the Draft PEIR has been revised as follows:

**Table 1-1. Anticipated Agency Approvals and Reviews**

AGENCY	PERMIT OR APPROVAL
Los Angeles County Department of Public Works (DPW)	<ul style="list-style-type: none"><li>• Sewer service for restrooms/café if wastewater is discharged to a DPW maintained sewer line</li><li>• <u>Review of Site-Specific Geotechnical Studies and Grading Plans</u></li></ul>
South Coast Air Quality Management District (SCAQMD)	<ul style="list-style-type: none"><li>• <del>Permit to Construct and Operate</del></li><li>• <u>Compliance with Rules 201 (Permit to Construct), 203 (Permit to Operate), 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion Engines), and 1110.2 (Emissions from Gaseous- and Liquid-Fueled Engines)</u></li><li>• <u>Permit should the Trail Lift system require an emergency generator rated greater than 50 brake horsepower</u></li></ul>

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<b>AGENCY</b>	<b>PERMIT OR APPROVAL</b>
Los Angeles County Sheriff's Department (Parks Bureau)	<ul style="list-style-type: none"><li>• <u>Private Security Plan Review</u></li><li>• <u>Operations Plan Review</u></li><li>• <u>Staffing Assessment and Safety Plan</u></li></ul>
Los Angeles County Fire Department	<ul style="list-style-type: none"><li>• <u>Fire Incident Plan Review</u></li><li>• <u>Preliminary Fuel Modification Plan</u></li></ul>

2. The following bulleted items have been added to **Section 1.4, Documents Incorporated by Reference**, on page 1-5 of the Draft PEIR:

- ♦ Joint Powers Agreement (April 28, 1987)
- ♦ Amended Setback and Easement Agreement (1994)

3. The first three sentences of the fourth paragraph of **Section 2.1.1, Surrounding Land Uses**, on page 2-2 of the Draft PEIR have been revised to read:

To the south and southwest, the project site is bordered by a mix of uses, including a 230-acre portion of the 3,780-acre Puente Hills Preserve ~~preserve area~~ managed by the Puente Hills Habitat Preservation Authority, a cemetery use (Rose Hills Memorial Park), and a SCE ROW that contains two high power overhead electric transmission lines (T/L). The adjacent 230-acre preserve area in the Hacienda Hills and the remainder of the Puente Hills Preserve provides important aesthetic and ecological resources valuable for resident and migrant wildlife populations and for native plant communities. The Puente Hills Preserve ~~preserve area~~ maintains connectivity between the project site and the Chino and Puente Hills, which allows for wildlife movement between these open spaces.

4. The first complete sentence at the top of page 3.4-2 of the Draft PEIR has been revised to read:

To the south and southwest, the project site is bordered by a mix of uses, including a 230-acre portion of the 3,780-acre Puente Hills Preserve ~~preserve area~~ managed by the Puente Hills Habitat Preservation Authority (Habitat Authority), a cemetery use (Rose Hills Memorial Park), and a Southern California Edison (SCE) ROW that contains two high power overhead electric transmission lines (T/L).

5. The first sentence of the sixth full paragraph of **Section 3.4.4.1, Sensitive Plant and Wildlife Species**, on page 3.4-27 of the Draft PEIR has been revised to read:

The ~~CDFG~~ CDFW considers the loss of any listed, proposed, or CNPS List 1B species as a potentially adverse impact under the CEQA.

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6. The last sentence of the second full paragraph of **Section 3.4.4.1, Sensitive Plant and Wildlife Species**, on page 3.4-32 of the Draft PEIR has been revised to read:

Mitigation Measures ~~B-4, B-9~~ B-8, B-10, and B-13 will be implemented to reduce this impact to a less than significant level.

7. The third sentence of the third full paragraph of **Section 3.4.4.1, Sensitive Plant and Wildlife Species**, on page 3.4-32 of the Draft PEIR has been revised to read:

The special status species include: Braunton's milk-vetch, and Nevin's barberry, ~~and Lyon's pentachaeta~~.

8. Mitigation Measure B-1 on page 3.4-39 in **Section 3.4.5, Mitigation Measures**, has been revised to read:

**B-1: Conduct preconstruction surveys for ~~State and federally Threatened, Endangered, Proposed, Petitioned, and Candidate~~ special status plants and avoid any located occurrences of listed plants.**

Prior to grading of each development phase, focused surveys shall be conducted during the prior flowering season for special status species such as the many-stemmed dudleya, and slender and intermediate mariposa lilies to determine the presence or absence of ~~these~~ special-status plants. If no specimens are found within the Proposed Project, then no additional mitigation is required.

In the event that special-status plants ~~the many-stemmed dudleya, slender and/or intermediate mariposa lilies~~ are identified within the Proposed Project, the County shall prepare a special-status plant restoration plan in coordination with the USFWS and/or the CDFW. Target sites (subject to County approval) for mitigation shall be sampled for soil type and habitat criteria sufficient for the establishment and growth of the affected special-status species. The plan shall additionally include, but not be limited to, the following components:

- 1) Performance criteria (i.e., what is an acceptable success level of revegetation to mitigate ~~past-project~~ impacts);
  - 2) Monitoring effort (who is to check on the success of the revegetation plan, and how frequently);
  - 3) Contingency planning (if the effort fails to reach the performance criteria, identify the remediation steps need to be taken); and
  - 4) Irrigation method/schedule (how much water is needed, where, and for how long).
9. Mitigation Measure B-2 on page 3.4-40 in **Section 3.4.5, Mitigation Measures**, has been revised to read:

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**B-2: Conduct surveys for ~~State and federally Threatened, Endangered, Proposed, Petitioned, and Candidate~~ special status plants and avoid any located occurrences of listed plants.**

Prior to issuance of a grading permit and future phase approval, the County shall conduct surveys for ~~federally and state listed Threatened and Endangered, Proposed, Petitioned, and Candidate~~ special-status plants in all areas subject to ground-disturbing activity. The surveys shall be conducted during the appropriate blooming period(s) by a qualified plant ecologist/biologist according to protocols established by the USFWS, CDFW, and CNPS. If none of the listed plants are found, no further mitigation is required.

In the event a listed plant is discovered onsite, the current and anticipated future distribution of the species shall be mapped by a qualified biologist. The CDFW, USFWS and County shall be formally notified and consulted regarding the presence of either the federal and/or state listed species onsite. A preservation and management plan shall be prepared for the species by a qualified biologist and shall include, but not be limited to, the following:

- 1) The County will provide a buffer between development and any listed plant that may be found onsite as required by CDFW. This buffer zone shall be designated with appropriate fencing to exclude construction vehicles and public access, but not wildlife access;
- 2) The size of the buffer depends upon the use of the immediately adjacent lands, and includes consideration of the plant's ecological requirements (e.g., sunlight, moisture, shade tolerance, edaphic physical and chemical characteristics) that are identified by a qualified plant ecologist and/or botanist. At minimum, the buffer shrub species shall be equal to twice the drip line (i.e., two times the distance from the trunk to the canopy edge) in order to protect and preserve the root systems of the plant. The buffer for herbaceous species shall be, at minimum, 50 feet from the perimeter of the population or the individual. A smaller buffer may be established, provided there are adequate measures in place to avoid the take of the species, with the approval of the USFWS and/or CDFW;
- 3) Stormwater runoff, irrigation runoff, and other drainage from developed areas shall not pass through areas populated by the listed species;
- 4) Listed species areas shall not be artificially shaded by structures or landscaping within the adjacent development areas;
- 5) Pesticide use shall not be permitted within listed plants areas;
- 6) The County will be responsible for monitoring the listed plant areas during construction;
- 7) ~~and after~~ Post project completion monitoring shall be identified and the frequency and extent of monitoring shall be determined in coordination with the USFWS and/or CDFW.

In the event it is determined that Proposed Project could potentially affect listed plants, the CDFW shall be contacted to determine the need for a "take permit" under the California Endangered Species Act. Appropriate mitigation required to minimize or

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mitigate impacts to the listed plants shall be implemented and may include the following: the creation of a preserve, establishment of vegetated buffers or other setbacks, drainage modification of the adjacent areas, revegetation, and monitoring to ensure the success of the mitigation.

10. Mitigation Measure B-3 on page 3.4-41 in **Section 3.4.5, Mitigation Measures**, has been revised to read:

**B-3: Pre-construction surveys and biological monitoring.**

Qualified biological monitor(s) shall be assigned to the project. Preconstruction biological clearance surveys shall be performed to minimize impacts on sensitive plants or wildlife species. The monitors will be responsible for ensuring that impacts to sensitive species, native vegetation, wildlife habitat, or unique resources will be avoided to the fullest extent possible. Where appropriate, monitors will flag the boundaries of areas where activities need to be restricted to protect native plants and wildlife, or sensitive species. These restricted areas shall be monitored to ensure their protection during construction. Planned sustained noise levels over 60 decibels (e.g., construction, park activities) will be evaluated by the County in relation to sensitive biological resources including nesting birds. The County will coordinate with USFWS and CDFW to determine if additional biological monitoring is required.

11. Mitigation Measure B-4 on page 3.4-41 in **Section 3.4.5, Mitigation Measures**, has been revised to read:

**B-4: Conduct protocol surveys for California gnatcatcher and avoid occupied habitat.**

Prior to issuance of a grading permit, the County shall conduct protocol surveys for California gnatcatcher. A qualified biologist who is permitted by the USFWS to conduct surveys for California gnatcatcher shall conduct surveys in areas of suitable habitat to inform the planning process as each phase is developed. ~~prior to construction or site-preparation activities in these areas.~~ The surveys shall be conducted in accordance with the accepted USFWS survey protocol. If California gnatcatchers are identified within proposed work areas, agency coordination may be required.

If construction activities occur during the breeding season in known occupied habitat for California gnatcatcher, focused surveys shall be conducted within the project site and adjacent areas within 500 feet. The surveys shall be of adequate duration to verify potential nest sites. These surveys may be modified through the coordination with the agencies based on the condition of habitat, the observation of the species, or avoidance of coastal sage scrub areas during the breeding season.

If a territory or nest is confirmed, a 500-foot disturbance-free buffer shall be established and demarcated by fencing or flagging. This buffer may be adjusted provided noise levels do not exceed 60 dB(A) hourly Leq at the edge of the nest site as determined by a qualified biologist in coordination with a qualified acoustician. If the noise meets or exceeds the 60 dB(A) Leq threshold, or if the qualified biologist determines that the

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construction activities are disturbing nesting activities, the qualified biologist shall have the authority to halt the construction and shall devise methods to reduce the noise and/or disturbance in the vicinity. This may include methods such as, but not limited to, turning off vehicle engines and other equipment whenever possible to reduce noise, installing a protective noise barrier between the nest site and the construction activities, and working in other areas until the young have fledged. If noise levels still exceed 60 dB(A) Leq hourly at the edge of nesting territories and/or a no-construction buffer cannot be maintained, construction shall be deferred in that area until the nestlings have fledged. All active nests shall be monitored on a weekly basis until the nestlings fledge. No construction shall occur within this buffer during the breeding season for these species.

- 12. Mitigation Measure B-5 on page 3.4-42 in Section 3.4.5, Mitigation Measures**, has been revised to read:

**B-5: Conduct nesting bird surveys to ensure that there would be not significant impacts to nesting birds and no violation of the Migratory Bird Treaty Act.**

~~Prior to issuance of a grading permit, the County shall conduct nesting bird surveys.~~ A qualified biologist shall conduct nesting bird surveys prior to construction or site-preparation activities occurring during the nesting and breeding season of native bird species (typically February through August). The survey area shall include all potential bird nesting areas, including grasslands, scrub habitat, woodlands, and isolated trees that are within 500 feet of construction activities. The survey shall be conducted no more than three days prior to commencement of construction activities (i.e., grubbing or grading).

If active nests of bird species protected by the Migratory Bird Treaty Act and/or the CFGC (2008) (which, together, apply to all native nesting bird species) are present in the construction zone or within 500 feet of the construction zone, a temporary buffer fence shall be erected a minimum of 300 feet around the nest site. This temporary buffer may be greater or lesser depending on the bird species and construction activity, as determined by the qualified biologist and/or applicable regulatory agency permits.

Vegetation clearing and construction within temporarily fenced areas shall be postponed or halted until juveniles have fledged and there is no evidence of a second nesting attempt. The qualified biologist shall serve as a Construction Monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur.

- 13. Mitigation Measure B-6 on page 3.4-43 in Section 3.4.5, Mitigation Measures**, has been revised to read:

**B-6: Protection of native vegetation communities.**

Prior to issuance of a grading permit, the County shall document the community type and acreage of vegetation that would be subject to project disturbance. Disturbance or

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removal of native vegetation shall not exceed the minimum necessary to complete operations. Every effort ~~would~~ will be made to minimize vegetation removal and permanent loss at construction sites. If necessary, native vegetation ~~would~~ will be flagged for protection. A project revegetation plan ~~would~~ shall be prepared for areas of native habitat temporarily affected during construction.

The USFWS and CDFW will be consulted on the project revegetation plan. Any impacts to special status species habitat will be evaluated to determine if an incidental take permit would be required.

14. Mitigation Measure B-7 on page 3.4-43 in **Section 3.4.5, Mitigation Measures**, has been revised to read:

**B-7: Protection of oak trees.**

The County does not foresee any oak tree removals in Phases I or II of the Proposed Project. For Future Phases an ~~An~~ oak tree permit will be obtained prior to cutting, destroying, removing, relocating, inflicting damage, or encroaching into the protected zone of any oak trees with a diameter at breast height (dbh) of eight inches or more. All protection and replacement measures shall be consistent with the Los Angeles County Oak Tree Ordinance.

15. Mitigation Measure B-8 on pages 3.4-43 to -44 in **Section 3.4.5, Mitigation Measures**, has been revised to read:

**B-8: Preparation of a landscaping plan.**

Prior to issuance of a grading permit, the County shall prepare a landscaping plan for the Proposed Project as part of the Master Plan. It shall include a plant palette derived from the existing Sanitation Districts approved plant palette for the landfill. The plant palette shall be composed of non-invasive species that are adapted to the conditions found on the project site and do not require high irrigation rates. The landscaping plan will also include a list of invasive plant species (e.g., California Invasive Plant Inventory Database online at <http://www.calipc.org/paf/>) prohibited from being planted on the project site. In addition, retail sales of these invasive plant species will be prohibited at any businesses (nurseries) located within the project site. Landscape plans shall encourage planting of local natives typical of native vegetation within ten miles of the project site.

The USFWS and CDFW will be consulted on the landscaping plan. Specifically, with regards to California gnatcatcher and wildlife, coastal sage scrub and other native vegetation communities will be established to the maximum extent possible, which includes areas within and adjacent to the Proposed Project. The establishment of the landscape will be in advance of any direct impacts to native vegetation communities to offset temporal loss of habitat for wildlife to preserve and enhance the existing wildlife corridor to the extent feasible. The landscaping plan will contribute to the connectivity of native habitats, including designated critical habitat for gnatcatcher, between the Rio Hondo Wildlife Sanctuary Significant Ecological Area (SEA) (Ecology Canyon) to the west

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and the Puente Hills SEAs including the conceptual Hacienda Hills SEA to the south and east and the overall Puente-Chino Hills Wildlife Corridor. The establishment of vegetative cover over the previously disturbed/developed areas will also support the dispersal of gnatcatcher from the Montebello Hills to the west as well as other wildlife through the project area.

- 16.** Mitigation Measure B-11 on page 3.4-44 in **Section 3.4.5, Mitigation Measures**, has been revised to read:

**B-11: Maternity colony or hibernaculum surveys for roosting bats.**

Prior to issuance of a grading permit, the County shall conduct maternity colony or hibernaculum survey for roosting bats. A pre-activity (e.g., vegetation removal, grading) survey for roosting bats within 200 feet of project activities shall be conducted within ~~15~~ 7 days prior to any grading of rocky outcrops or removal of trees (particularly trees 12 inches in diameter or greater at 4.5 feet above grade with loose bark or other cavities) within 200 feet of project activities.

Conduct surveys for roosting bats during the maternity season (March 1 to July 31) within 300 feet of project activities. Trees and rocky outcrops shall be surveyed by a qualified bat biologist. Surveys shall include a minimum of one day and one evening.

If active maternity roosts or hibernacula are found, the rock outcrop or tree occupied by the roost shall be avoided (i.e., not removed) by the Proposed Project, if feasible. For active roosts or hibernacula that are present in the construction zone or within 300 feet of the construction zone, a temporary buffer fence shall be erected a minimum of 100 feet around the roost or hibernacula site. This temporary buffer may be greater or lesser depending on the bat species and construction activity, as determined by the qualified biologist and/or applicable regulatory agency permits.

If avoidance of the maternity roost is not feasible, the qualified bat biologist shall survey (through the use of radio telemetry or other CDFW approved methods) for nearby alternative maternity colony sites. If the qualified bat biologist determines in consultation with and with the approval of CDFW that there are alternative roost sites used by the maternity colony and young are not present then no further action is required, and it will not be necessary to provide alternate roosting.

If impacts to the potential bat roosting habitat are unavoidable, or if the size, configuration, or complexity of a potential roost warrants additional surveys as determined by the qualified biologist, a one-night emergence survey (acoustic survey) will be conducted per roost to assess the species and population size. Note that night emergence surveys to determine absence cannot be performed during the inactive period (between November 1 and February 15). All observations of sensitive species and occupied bat roosts will be reported to the County.

Should a maternity roost be identified within the disturbance footprint and impacts cannot be avoided, and no alternative maternity roosts are in use near the site, substitute roosting habitat for the maternity colony will be provided on, or in close

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proximity to, the project site no less than 3 months prior to the eviction of the colony. Should a hibernaculum (i.e., non-breeding roost) be identified within the disturbance footprint and impacts cannot be avoided, passive humane eviction will be conducted in coordination with CDFW.

17. Mitigation Measure B-12 on page 3.4-45 in **Section 3.4.5, Mitigation Measures**, has been revised to read:

**B-12: Conduct pre-construction surveys for American badgers and passively relocate during the nonbreeding season.**

~~Prior~~ No more than 7 days prior to issuance of a grading permit, the County shall implement pre-construction surveys for American badgers within suitable habitat. If present, occupied badger dens shall be flagged and ground-disturbing activities avoided within 50 feet of the occupied den avoided. Maternity dens shall be avoided during pup-rearing season (February 15 through July 1) and a minimum 200-foot buffer established. Buffers may be modified with the concurrence of CDFW. Maternity dens shall be flagged for avoidance, identified on construction maps, and a biological monitor shall be present during construction. Any relocation of badgers shall occur only after consultation with the CDFW. A written report documenting the badger removal shall be provided to CDFW within 30 days of relocation.

18. Mitigation Measure CR-2 on page 3.5-17 in **Section 3.5.5, Mitigation Measures**, has been revised to read:

**CR-2:** If subsurface deposits believed to be cultural in origin are discovered during construction, then all work must halt within a 200-foot radius of the discovery. A qualified professional archaeologist shall be retained to evaluate the significance of the find. Work cannot continue at the discovery site until the archaeologist conducts sufficient research and data collection to make a determination that the resource is either 1) not cultural in origin; or 2) not potentially significant or eligible for listing on the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR). If a potentially-eligible resource is encountered, then the archaeologist, lead agency, and project proponent shall arrange for either 1) total avoidance of the resource, if possible; or 2) test excavations to evaluate eligibility for the CRHR and, if eligible, data recovery as mitigation.

19. Mitigation Measure T-1 on page 3.14-58 in **Section 3.14.6, Mitigation Measures**, has been revised to read:

**T-1:** Prior to the construction and use of the access road by Rose Hills Memorial Park, the County, the Sanitation Districts of Los Angeles County (Sanitation Districts), and Rose Hills Memorial Park (Rose Hills) will enter into a tri-party agreement setting forth each of the parties rights and responsibilities for the construction, maintenance, and use of the access road and any extension or modifications thereto.

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The tri-party agreement will include funding for public service expenses per Mitigation Measure PS-4, as well as related access road management issues including, but not limited to:

- The number of proposed funeral processions that would utilize the Rose Hills Memorial Park access road easement, the size of such processions, and the allowable schedule for all such processions.
- Traffic management measures for all such funeral processions designed to ensure compatibility with park uses, including avoidance of peak park use periods.
- Roadway maintenance protocols such as inspections, maintenance actions, scheduling, and other factors designed to allocate cost to all parties proportionally based on their share of impact on the road.
- ~~Offset the impacts of Rose Hills Memorial Park traffic on shared portions of the access road.~~
- Improvements to the park entrance to minimize traffic and operational conflicts with the Sanitation Districts and Rose Hills, such as signage, lighting, and roadway improvements.
- Agreements relative to implementation of Mitigation Measures T-2, T-3, T-4, and T-5.

**20. Mitigation Measure T-3 on pages 3.14-58 and 3.14-59 in Section 3.14.6, Mitigation Measures, has been revised to read:**

**T-3:** ~~Prior to the construction~~ During the design and construction by Rose Hills of any extension to the shared access road to connect to the Rose Hills property, Rose Hills shall fund the design and construction of a trail ~~overcrossing~~ at the intersection with the Schabarum-Skyline Trail to permit trail users to safely ~~bypass~~ navigate funeral processions and vehicular traffic. The trail ~~overcrossing~~ shall be designed as either a grade-separated or at-grade crossing, but in either case it shall optimize safety for both trail users and vehicular traffic. It shall ~~to~~ be wide enough and of a gentle grade to safely accommodate equestrians, other trail users, and wildlife passage as appropriate. Safety fencing, signage, equestrian waiting area, push button signal actuators for equestrians, landscape screening, earthen surfaces or other non-slip materials, and other techniques ~~shall~~ may be employed to ensure trail user safety. The ~~overpass crossing~~ shall be designed per the current County of Los Angeles Trail Manual (adopted May 17, 2011 and as revised). The Trail Manual includes ~~plans~~ provisions for both grade-separated and at-grade crossings ~~and grade-separated crossings~~ of multi-use trails with roadways. The crossing shall also be designed per U.S. Forest Service requirements for equestrian crossings. The design shall be approved by the County's Department of Public Works and Department of Parks and Recreation prior to construction ~~of the trail overcrossing~~. The requirements of this mitigation measure ~~may~~ shall become part of the tri-party agreement to be entered to among the County, the Sanitation Districts, and Rose Hills.

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21. In regards to the presence of trained motorcade escorts accompanying funeral processions, Mitigation Measure T-4 on page 3.14-59 of the Draft PEIR is hereby revised as follows:

**T-4:** Rose Hills shall provide at least 24 hours advance notice to DPR staff for funeral processions that will travel through the Park to reach the Rose Hills property, including the estimated time of arrival. Rose Hills shall either ensure the presence of trained motorcade escorts with each funeral procession or fund deployment of County traffic enforcement personnel to ensure protection of public safety, ease of public access to the Park, and minimal interference with Park users. These measures shall apply to Alignment Alternatives 1, 2, and 3 for the Rose Hills access road. The requirements of this mitigation measure may become part of the tri-party agreement to be entered to among the County, the Sanitation Districts, and Rose Hills.

22. Mitigation Measure T-5 on page 3.14-59 in **Section 3.14.6, Mitigation Measures**, has been revised to read:

**T-5:** To maintain emergency access and minimize potential conflicts with park users, the park access road between Crossroads Parkway South and the Visitor Center, and between the Visitor Center and the point at which the park loop road begins, shall be configured to accommodate shoulder space for inbound vehicles to pull over and allow emergency service vehicles to safely pass. The Rose Hills access road shall be designed to appropriate County standards, Fire Department requirements, which shall be subject to review and approval by the Department of Public Works and the Department of Parks and Recreation. These measures shall apply to Alignment Alternatives 1, 2 and 3 for the Rose Hills access road.

At the narrow section between the Visitor Center and the point at which the park loop road begins, ~~the presence of methane collection systems adjacent to the road makes it impossible to provide two inbound lanes or to provide a similar pavement width, accordingly, a funeral procession could not pull over sufficiently to allow an inbound emergency vehicle to pass. To address this limitation, when funeral processions are passing at the same time that emergency access is needed, the multi-use trail surface will be designed and constructed to allow for~~ inbound vehicles funeral processions under direction of trained motorcade escorts or County traffic enforcement personnel to temporarily pull over onto the trail to allow emergency vehicles to pass. The trained motorcade escorts or County traffic personnel shall ensure safety of trail users during these emergency conditions. or, alternatively, a traffic control officer shall be stationed uphill from that narrow segment to halt outbound traffic when an emergency vehicle is arriving. These measures apply to Alignment Alternatives 1, 2 and 3 for the Rose Hills access road.

23. Mitigation Measure T-6 on page 3.14-60 in **Section 3.14.6, Mitigation Measures**, has been revised to read:

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**T-6:** The County shall ensure that event permittees prepare and implement a Traffic Management Plans (TMPs) for special events which will identify potential off-site parking location(s) and ways to bring event-goers from these location(s) to the park and identify the primary routes of travel to ensure efficient vehicle traffic movement and control between the I-605, SR-60, and adjacent roadways and the Proposed Project. The plans will designate the routes for entry and exit, signage placement along these routes, temporary street closures, and other special traffic management procedures, such as use of traffic control personnel to direct traffic at key intersections. The staffing levels and locations of law enforcement officers, including security, traffic, and parking personnel will also be identified to assist with the control of the roadways. Each TMP shall be tailored to the specific special event(s) and approved prior to the start of the event. ~~The TMP will also identify potential off-site parking locations and ways to bring event-goers from there to the park.~~

~~A Construction Traffic Management Plan (TMP) shall also be prepared and approved by the County prior to construction of any park improvements. The Construction TMP shall require prior notices, adequate sign-posting, detours, phased construction and temporary driveways where necessary to reduce construction-related impacts that may result from the Proposed Project. The Construction TMP shall also identify any haul routes for earth, concrete, or construction materials and equipment. The Construction TMP shall be subject to review and approval by the following County departments: Public Works, Fire, Regional Planning, and Sheriff prior to issuance of grading or building permits.~~

**24.** Mitigation Measure T-7 has been added to page 3.14-60 in **Section 3.14.6, Mitigation Measures:**

**T-7:** A Construction Traffic Management Plan (Construction TMP) shall be prepared and implemented by the County prior to and during construction of any park improvements. The Construction TMP shall require prior notices, adequate sign-posting, detour, phased construction and temporary driveways where necessary to reduce construction-related impacts that may result from the Proposed Project. The Construction TMP shall also identify any haul routes for earth, concrete, or construction materials and equipment. The Construction TMP shall be subject to review and approval by the following County departments: Public Works, Fire, Regional Planning, and Sheriff prior to issuance of grading or building permits.

**25.** With the addition of Mitigation Measure T-7, the last sentence in **Section 3.14.5.5 Construction**, has been revised to read:

The Construction TMP shall be subject to review and approval by the following County departments: Public Works, Fire, Regional Planning, and Sheriff prior to issuance of

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grading or building permits. With implementation of the Construction TMP per Mitigation Measure T-~~76~~, impacts would be less than significant.

- 26.** With the addition of Mitigation Measure T-7, **Section 3.14.7 Residual Impacts After Mitigation**, has been revised to read:

With implementation of Mitigation Measures T-1 through T-~~76~~, any residual impacts would be less than significant.

- 27.** Revisions have been made to **Section 3.2.1.3, Sensitive Receptors and Existing Views of the Project Site**, of the Aesthetics section of the Draft PEIR. The second paragraph of *Views of the Project Site from the West* of Section 3.2.1.3 has been replaced with the following paragraphs.

***Views of the Project Site from the West***

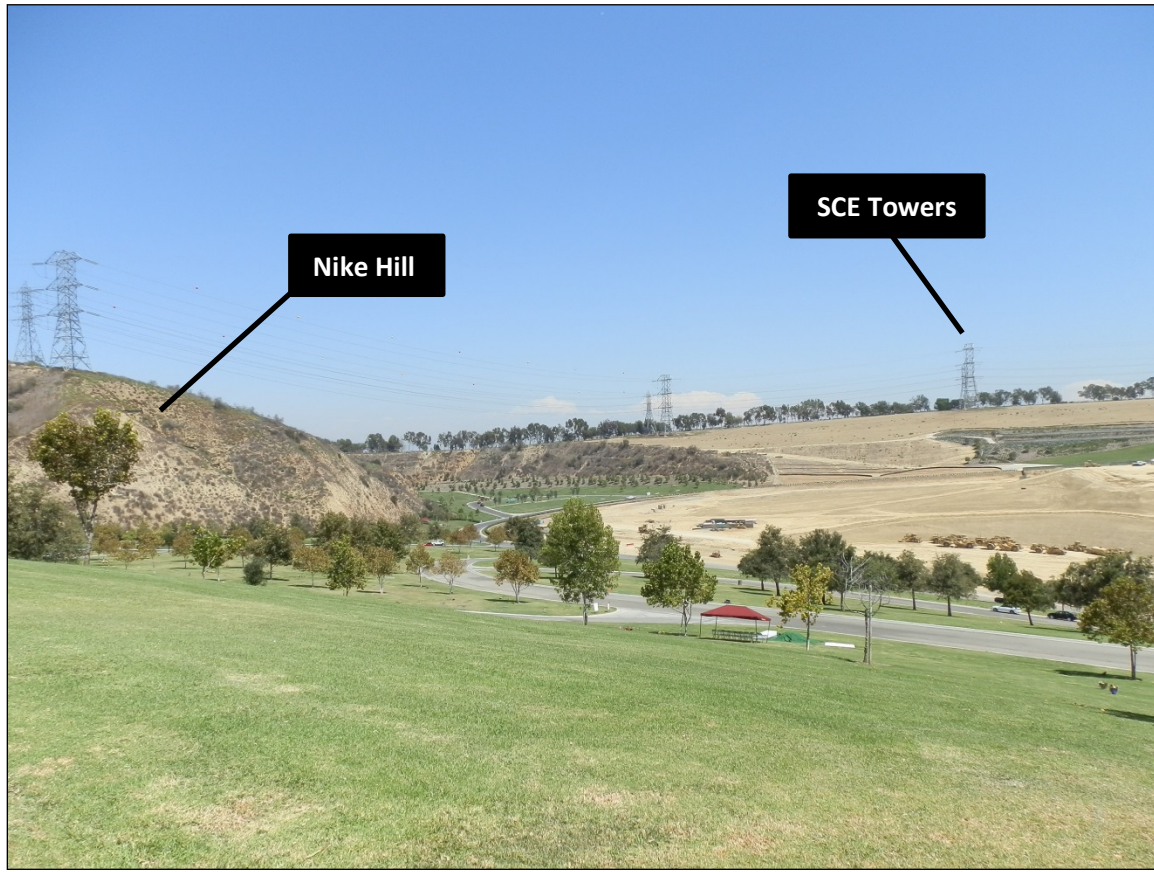
Rio Hondo College is located adjacent to the southwest boundary of the landfill. Campus visitors have very limited visual access to the project site due to the steepness of the Puente Hills. Due to an intervening natural ridgeline, there is no direct visual access of landfill closure operations from Rio Hondo College.

~~South of the college is Rose Hills Memorial Park, which borders the project site for almost one mile. Rose Hills Memorial Park visitors would have views of the landfill depending on the direction and location within the memorial park the viewer is located. Memorial park visitors of the Buddhist Memorial Columbarium would have views of Nike Hill. Memorial park visitors located in the vicinity of two areas referred to as Greenwood Gardens II and Garden of Comfort II would have views of the M&O Yard, Western Deck, and Nike Hill. These two areas are located within the memorial park west of Nike Hill and south of the M&O Yard (generally in the northeast area of the memorial park). Existing viewsheds from these two areas includes foreground views of natural hillsides (Nike Hill) with the inclusion of man-made structures (SCE transmission lattice towers, water tanks) and background views of the San Gabriel Valley and Mountains. Due to the topography of Rose Hills Memorial Park, views from other locations within the memorial park are generally of natural hillsides (Nike Hill) and the ridgeline where the Schabarum-Skyline Trail is located.~~

South of the college is Rose Hills Memorial Park, which borders the project site for almost one mile. Rose Hills Memorial Park visitors would have views of the landfill depending on the direction and location within the memorial park the viewer is located. Figure 3.2-14 shows the existing view that memorial park visitors have when looking east towards the Southern Deck from the road between the Dawn Terrace and Mission Terrace.

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*Figure 3.2-14 View from Rose Hills Looking East from the Road Between the Dawn Terrace and Mission Terrace Lawn*

Foreground views are dominated by the memorial park's landscape. Middleground views are dominated by the west and south face of Nike Hill and small remnants of natural and recently graded hillsides. Background views are of the sky. This area of Rose Hills can be described as an enclosed landscape surrounded by Nike Hill and a ridgeline, where the Schabarum-Skyline Trail is located. Nike Hill and the ridgeline are topographically superior to this area of the memorial park and block views of the Eastern and Southern Decks. Furthermore, man-made structures (SCE transmission line lattice towers and wires) are prominent features located on Nike Hill and along the ridgeline. Middleground and background views would not be considered a scenic vista as they do not provide an expansive view of a highly valued landscape.

Figure 3.2-15 shows the existing view that memorial park visitors have when looking north towards Nike Hill and the Western Deck from the road between the Dawn Terrace and Mission Terrace.

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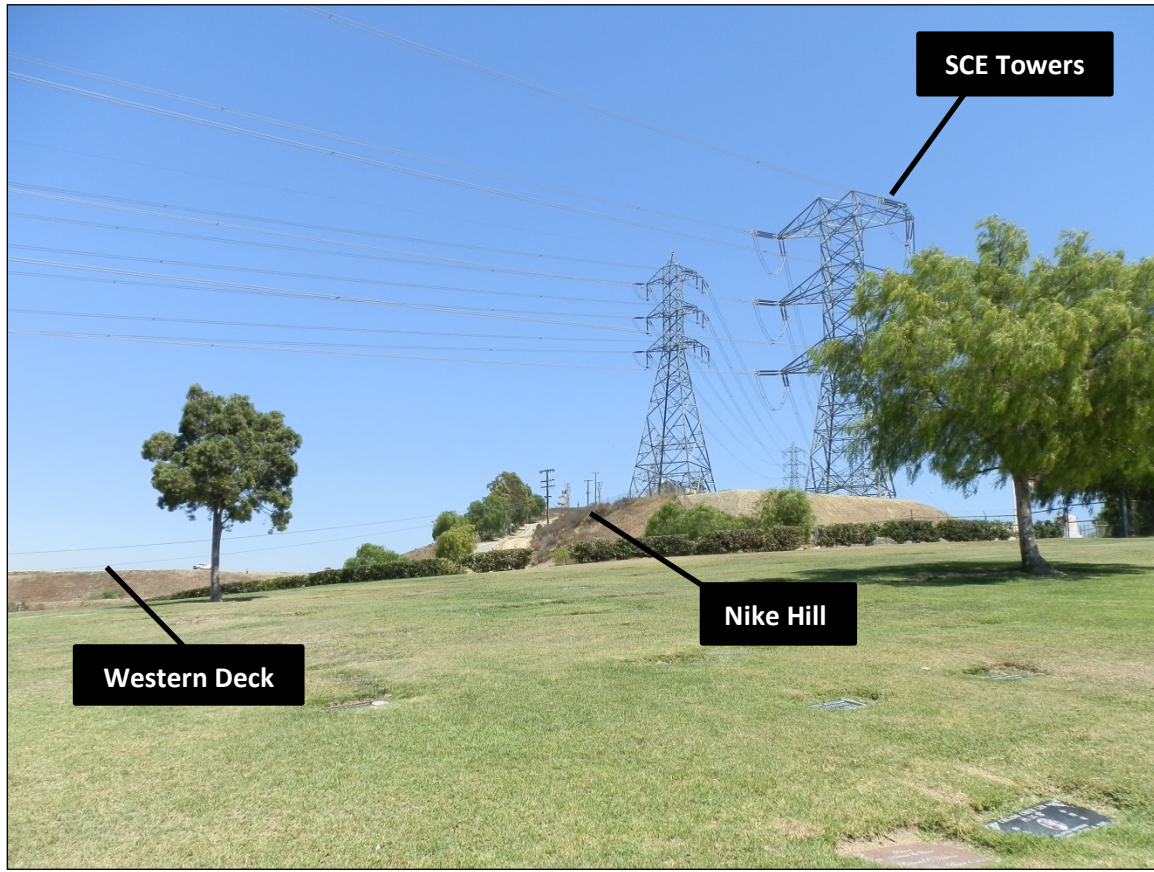
*Figure 3.2-15 View from Rose Hills Looking North from the Road Between the Dawn Terrace and Mission Terrace Lawn*

Foreground views are dominated by the memorial park's landscape. Middleground views are dominated by the south face of Nike Hill and several man-made structures (SCE transmission line lattice towers and wires, water tank, and radio tower). Background views are primarily of the sky. Background views also offer a small and partially blocked view of the San Gabriel Mountains (left side of the photo). This view of the San Gabriel Mountains would not qualify as a scenic vista because it is not an expansive view of the San Gabriel Mountains. Nike Hill is topographically superior to this area of the memorial park and blocks views of the Western and Eastern Decks. Furthermore, man-made structures (SCE transmission line lattice towers and wires, radio towers, and water tanks) continue to dominate views towards Nike Hill and the landfill. Middleground and background views afforded from this location would not be considered a scenic vista as they do not provide an expansive view of a highly valued landscape.

Figure 3.2-16 shows the existing view that memorial park visitors have when looking northeast towards Nike Hill and the Western Deck from the Garden of Commemoration II.

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*Figure 3.2-16 View from Rose Hills Looking Northeast from the Garden of Commemoration to Nike Hill*

Foreground views are dominated by the memorial park's landscape. Middleground views are dominated by the west face of Nike Hill and several man-made structures (SCE transmission line lattice towers and wires, radio tower). Middleground views also include views of the Western Deck. Background views are of the sky. Man-made structures continue to dominate views towards Nike Hill and the landfill. Middleground and background views afforded from this location would not be considered a scenic vista as they do not provide an expansive view of a highly valued landscape.

Figure 3.2-17 shows the existing view that memorial park visitors have when looking northeast towards Nike Hill and the Western Deck from the property fence at the Garden of Commemoration II.

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*Figure 3.2-17 View of the Landfill from Rose Hills Looking Northeast from the Northern Property Fence at the Garden of Commemoration II*

Foreground views are dominated by the memorial park's chain link fence with barbwire and the Schabarum-Skyline Trail. Middleground views are dominated by west and partial views of the north face of Nike Hill and several man-made structures (power poles and wires, radio tower, and water tank). Middleground views also include views of the Western Deck, and ongoing landfill construction (Nike Hill buttress) and maintenance activities. Background views are of the sky. Man-made structures continue to dominate views of Nike Hill (power poles and wires, radio tower, water tank, and paved trail). Middleground and background views afforded from this location would not be considered a scenic vista as they do not provide an expansive view of a highly valued landscape.

Figure 3.2-18 shows the existing view that memorial park visitors have when looking northeast towards Nike Hill and the Western Deck from the road between Greenwood Gardens II and Monument Terrace II.

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*Figure 3.2-18 View of the Landfill from Rose Hills Looking Northeast from the Road Between Greenwood Gardens II and Monument Terrace II*

Foreground views are dominated by the memorial park's landscaping and roadways. Middleground views are primarily blocked by ornamental trees in the foreground located along Rose Hills' fence line. Middleground views also include views of SCE transmission line lattice towers and wires. Background views are also blocked by the ornamental trees. Middleground and background views afforded from this location would not be considered a scenic vista as they do not provide an expansive view of a highly valued landscape.

Memorial park visitors of the Buddhist Memorial Columbarium would have views of the landfill property to the north. Foreground views from the columbarium are dominated by the memorial park's landscaping. Middleground views are dominated by the south face of Nike Hill, small remnants of natural and recently graded hillsides, and the ridgeline where the Schabarum-Skyline Trail is located. Due to intervening hills there are no direct views of the top decks. Background views are dominated by scenic vistas of the San Gabriel Mountains.

The Whittier Narrows Recreation Area is approximately three miles northwest of the project site adjacent to SR-60 in unincorporated Los Angeles County. There are no direct views of landfill closure activities from this vantage point, although there are accessible views of the soil stockpile and dense, mature vegetation on the north side of the landfill.

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On clear days, the project site may be visible to areas as far west of the site as the Monterey Hills. Views from the Monterey Hills are limited to the natural vegetation of the Puente Hills and the vegetated landfill slopes on the north side of the site. Interior portions of the site where landfill closure activities are occurring are not visible from locations to the west (Sanitation Districts 2001).

- 28.** The revisions to **Section 3.2.4, Environmental Impacts**, of the Aesthetics section of the Draft PEIR (starting on page 3.2-14) include clarifications to the impact analysis for scenic vistas.

<i>Threshold: Would the project have a substantial adverse effect on a scenic vista?</i>
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For purposes of determining significance under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Scenic vistas can be officially designated by public agencies, or informally designated by the public. A substantial adverse effect to such a scenic vista is one that degrades the view from a public viewpoint.

***Phases I and II***

Scenic vistas in the project area include the San Gabriel Mountains and Valley to the north and the Los Angeles Basin to the west. The Proposed Project would not affect scenic vistas of the San Gabriel Mountains or other scenic resources in the region because all of the proposed development would occur within the closed landfill. The Proposed Project would allow the public to enjoy scenic vistas of the surrounding valley, hills, and mountains.

During Phases I and II, the Proposed Project would develop the entry plaza, improve park circulation, build structures, and develop park elements within the project site. Development of the park would be concentrated in the top decks of the landfill which are primarily devoid of vegetation and structures. Currently, views of the top decks are limited to people on trails in the vicinity of the landfill. The panoramic views from area trails are a scenic vista. Furthermore, the Western Deck is visible from Rose Hills Memorial Park from areas west of Nike Hill and south of the M&O Yard. However, these views are dominated by man-made structures as depicted in Figures 3.2-14 through 3.12-18.

Developing the top decks with landscaping and recreational facilities would enhance the existing overall barren and industrial state of the site. Park amenities would be designed to frame scenic vistas giving park visitors the opportunity to enjoy the vistas available from the project site. Nike Hill, the highest point within the landfill, is a natural vantage point. A scenic overlook would be constructed on the north face of at Nike Hill allowing the public to enjoy the scenic vistas of the surrounding valley, hills, and mountains. The Proposed Project would also build a trail lift tower, mini café, staff office, restrooms, and zip line tower on the top of Nike Hill. As shown in Figure 2-5, these structures would be built near the existing Nike guard structure and existing ornamental trees north of the existing SCE transmission line lattice towers, radio towers, and the water tank.

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Rose Hills is located to the southwest of the landfill; as such, the majority of views of Nike Hill from Rose Hills is of the south and west faces of Nike Hill. Partial profile views of the north face are visible to Rose Hills' visitors when standing near the Rose Hills property fence, as depicted on Figure 3.2-17. Figure 3.2-17 shows middleground views of the west and partial views of the north face of Nike Hill that are dominated by the several man-made structures (power poles and wires, radio tower, and water tank). Middleground views also include partial views of the M&O Yard, Western Deck, and ongoing landfill construction (Nike Hill buttress) and maintenance activities. Furthermore, due to the skyline ridge and Nike Hill there are limited views of the top decks from within Rose Hills (see Section 3.2.1.3 Sensitive Receptors and Existing Views of the Project Site). As depicted in Figures 3.2-14 through 3.2-18, views from Rose Hills towards the landfill are dominated by man-made structures, such as SCE transmission towers.

The proposed scenic overlook would be at the scale of existing trees seen on Nike Hill, as depicted in the artist rendering of Nike Hill shown on Figure 3.2-13. Figures 2-5 and 3.2-15, show that existing man-made structure would intervene in the line of sight for Rose Hills visitors south of Nike Hill. Rose Hills visitors southwest of Nike Hill have views of the west face of Nike Hill. These visitors would see the proposed structures on Nike Hill. However, as depicted in Figure 3.2-17 views of the west face of Nike Hill are dominated by man-made structures, which include power poles and wires, radio towers, a water tank, and the paved Schabarum-Skyline Trail. The further southwest a visitor moves from the Rose Hills northern fence, views of Nike Hill become partially blocked by existing ornamental trees, as depicted in Figure 3.2-18. Furthermore, middleground and background views in the direction of the landfill available to Rose Hills' visitors that are located south and southwest of Nike Hill would not be considered a scenic vista as they do not provide an expansive view of a highly valued landscape, as shown in Figures 3.2-14 through 3.2-18. Figures 3.2-14 through 3.2-18 show that these views are dominated by existing man-made structures with the existing SCE transmission line being a prominent feature on the skyline ridge and Nike Hill.

The Buddhist Memorial Columbarium is located approximately one mile south of Nike Hill. Memorial park visitors of the Buddhist Memorial Columbarium would have views of the landfill property to the north. Foreground views from the columbarium are dominated by the memorial park's landscaping. Middleground views are dominated by the south face of Nike Hill, small remnants of natural and recently graded hillsides, and the ridgeline where the Schabarum-Skyline Trail and the SCE transmission line towers and wires are located. Due to intervening hills there are no direct views of the top decks. Background views are dominated by scenic vistas of the San Gabriel Mountains. As previously stated, the proposed structures would be built near the existing Nike guard structure and existing ornamental trees north of the existing SCE transmission line towers, radio towers, and water tank on Nike Hill. These existing man-made structures would intervene in the line of sight of visitors at the columbarium looking north to Nike Hill. As such, background scenic views of the San Gabriel Mountains from the Buddhist Memorial Columbarium would not be adversely affected.

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Therefore, scenic vistas ~~that include parts of landfill~~ from off-site viewpoints would not be adversely affected with implementation of the Proposed Project. ~~A beneficial~~ A less than significant impact would occur.

The Proposed Project would benefit scenic vistas of the San Gabriel Valley and the San Gabriel Mountains by providing a scenic overlook to enjoy the scenic views from Nike Hill. The inclusion of the trail lift system would allow access to those residents with mobile impairments allowing them to enjoy the scenic views from Nike Hill.

***Future Phases***

Impacts to scenic vistas from Future Phases of the Proposed Project are expected to be similar as those described for Phases I and II. However, due to the lack of project-specific details for projects to be developed under Future Phases, potential visual impacts to scenic vistas would be assessed during the additional environmental review of each project.

- 29. Table 3.11-4 on page 3.11-10 of the Draft PEIR has been replaced with the correct acceptable ranges for noise levels per land use.
- 30. Figure 3.11-2 has been added to the impact discussion on page 3.11-24 of the Draft PEIR (Noise Impacts to Off-site Receptors Due to On-site Operational Noise).

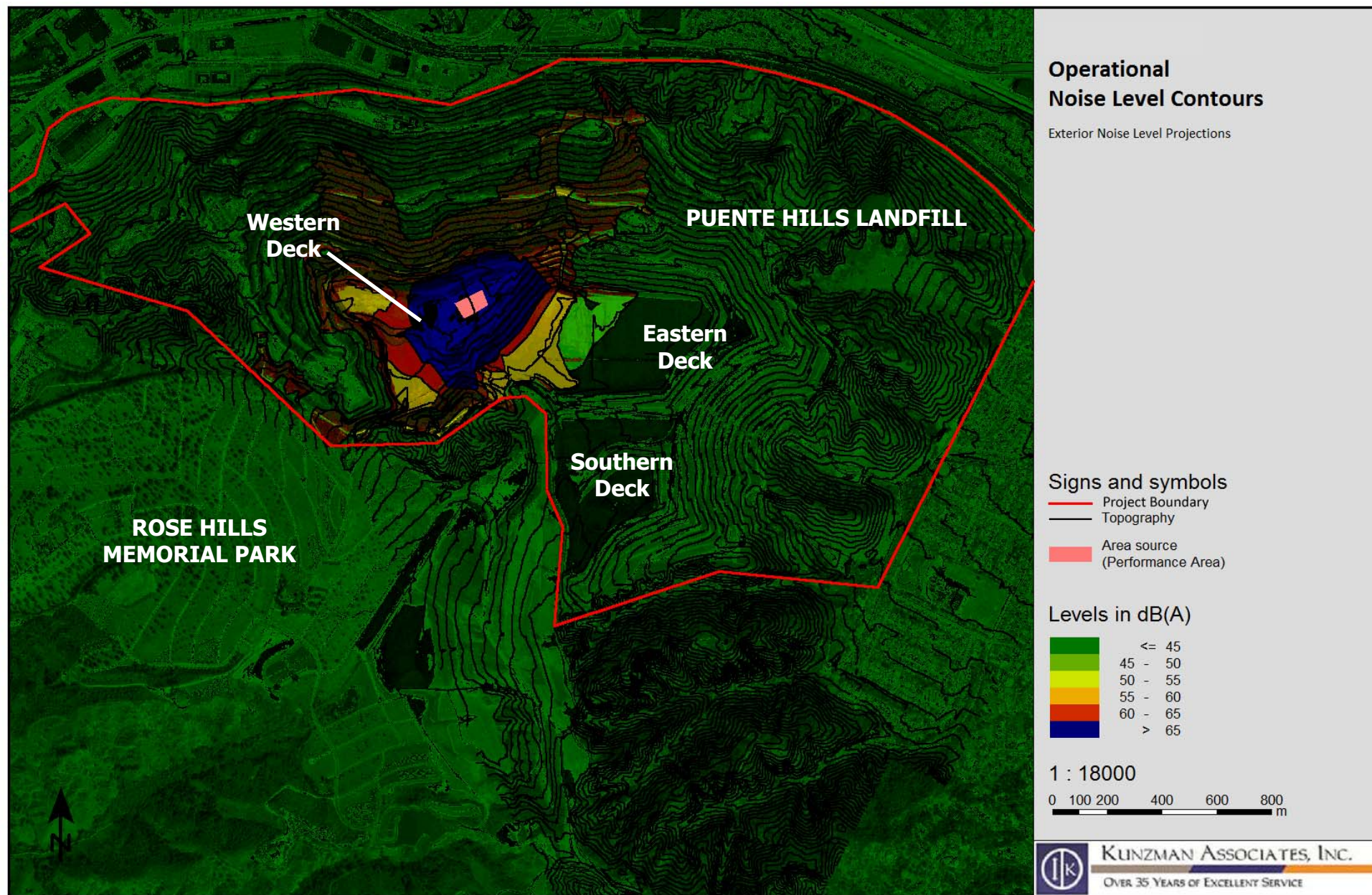
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**Table 3.11-4. State of California Land Use Compatibility for Community Noise Exposure (dBA CNEL or L<sub>dn</sub>)<sup>1</sup>**

Land Use	55	60	65	70	75	80
Residential-Low Density Single Family, Duplexes and Mobile Homes						
Residential- Multiple Family						
Transient Lodging, Motels, Hotels						
Schools, Libraries, Churches, Hospitals, Nursing Homes						
Auditoriums, Concert Halls, Amphitheaters						
Sports Arenas, Outdoor Spectator Sports						
Playgrounds, Neighborhood Parks						
Golf Courses, Riding Stables, Water Recreation, Cemeteries						
Office Buildings, Businesses, Commercial and Professional						
Industrial, Manufacturing, Utilities, Agriculture						

Normally Acceptable:	Conditionally Acceptable:	Normally Unacceptable:	Clearly Unacceptable:
Specified land uses is satisfactory based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation or requirements.	New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice. Outdoor environment will seem noisy.	New construction and development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made with needed noise insulation features included in the design. Outdoor areas must be shielded.	New construction or development should generally not be undertaken. Construction costs to make the indoor environment acceptable would be prohibitive and the outdoor environment would not be usable.
<sup>1</sup> Sources: OPR 2003 and City of Industry 2014.			

Location: N:\2015\2015-050 Puente Hills County Regional Park\Borders\PHL PMP Noise Contours.mxd (A4quiere, 9/27/2016) - mapping\_quest



Map Date: 9/27/2016  
Source: Kunzman 2016

**Figure 3.11-2 Operational Noise Contours**

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## **SECTION 5.0**

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### **MITIGATION MONITORING AND REPORTING PROGRAM**

The Mitigation Monitoring and Reporting Program (MMRP) for the Puente Hills Landfill Park Master Plan Project follows this page.

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**MITIGATION MONITORING AND REPORTING PROGRAM  
PUENTE HILLS LANDFILL PARK MASTER PLAN PROJECT**

MITIGATION MEASURES	RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	MONITORING AGENCY	DATE COMPLETED
<b>BIOLOGICAL RESOURCES</b>				
<p><b>B-1: Conduct preconstruction surveys for special status plants and avoid any located occurrences of listed plants.</b></p> <p>Prior to grading of each development phase, focused surveys shall be conducted during the prior flowering season for special status species such as the many-stemmed dudleya and slender and intermediate mariposa lilies to determine the presence or absence of special-status plants. If no specimens are found within the Proposed Project, then no additional mitigation is required.</p> <p>In the event that special-status plants are identified within the Proposed Project, the County shall prepare a special-status plant restoration plan in coordination with the USFWS and/or the CDFW. Target sites (subject to County approval) for mitigation shall be sampled for soil type and habitat criteria sufficient for the establishment and growth of the affected special-status species. The plan shall additionally include, but not be limited to, the following components:</p> <ol style="list-style-type: none"> <li>1) Performance criteria (i.e., what is an acceptable success level of revegetation to mitigate project impacts);</li> <li>2) Monitoring effort (who is to check on the success of the revegetation plan, and how frequently);</li> <li>3) Contingency planning (if the effort fails to reach the performance criteria, identify the remediation steps need to be taken); and</li> <li>4) Irrigation method/schedule (how much water is needed, where, and for how long).</li> </ol>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Qualified Plant Ecologist/Biologist</li> </ul>	<p>Preconstruction surveys shall be conducted prior to issuance of grading permits for Phases I and II and prior to phase approval for Future Phases.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• County of Los Angeles Department of Regional Planning (DRP)</li> <li>• California Department of Fish and Wildlife (CDFW)</li> <li>• United States Fish and Wildlife Service (USFWS)</li> </ul>	

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MITIGATION MEASURES	RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	MONITORING AGENCY	DATE COMPLETED
<p><b>B-2: Conduct surveys for special status plants and avoid any located occurrences of listed plants.</b></p> <p>Prior to issuance of a grading permit and future phase approval, the County shall conduct surveys for special-status plants in all areas subject to ground-disturbing activity. The surveys shall be conducted during the appropriate blooming period(s) by a qualified plant ecologist/biologist according to protocols established by the USFWS, CDFW, and CNPS. If none of the listed plants are found, no further mitigation is required.</p> <p>In the event a listed plant is discovered onsite, the current and anticipated future distribution of the species shall be mapped by a qualified biologist. The CDFW, USFWS and County shall be formally notified and consulted regarding the presence of either the federal and/or state listed species onsite. A preservation and management plan shall be prepared for the species by a qualified biologist and shall include, but not be limited to, the following:</p> <ol style="list-style-type: none"> <li>1) The County will provide a buffer between development and any listed plant that may be found onsite as required by CDFW. This buffer zone shall be designated with appropriate fencing to exclude construction vehicles and public access, but not wildlife access;</li> <li>2) The size of the buffer depends upon the use of the immediately adjacent lands, and includes consideration of the plant's ecological requirements (e.g., sunlight, moisture, shade tolerance, edaphic physical and chemical characteristics) that are identified by a qualified plant ecologist and/or botanist. At minimum, the buffer shrub species shall be equal to twice the drip line (i.e., two times the distance from the trunk to the canopy edge) in order</li> </ol>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Qualified Plant Ecologist/Biologist</li> </ul>	<p>Surveys shall be conducted prior to issuance of grading permits for Phases I and II and prior to phase approval for Future Phases.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• County of Los Angeles Department of Regional Planning (DRP)</li> <li>• California Department of Fish and Wildlife (CDFW)</li> <li>• United States Fish and Wildlife Service (USFWS)</li> </ul>	

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<p>to protect and preserve the root systems of the plant. The buffer for herbaceous species shall be, at minimum, 50 feet from the perimeter of the population or the individual. A smaller buffer may be established, provided there are adequate measures in place to avoid the take of the species, with the approval of the USFWS and/or CDFW;</p> <p>3) Stormwater runoff, irrigation runoff, and other drainage from developed areas shall not pass through areas populated by the listed species;</p> <p>4) Listed species areas shall not be artificially shaded by structures or landscaping within the adjacent development areas;</p> <p>5) Pesticide use shall not be permitted within listed plants areas;</p> <p>6) The County will be responsible for monitoring the listed plant areas during construction;</p> <p>7) Post project completion monitoring shall be identified and the frequency and extent of monitoring shall be determined in coordination with the USFWS and/or CDFW.</p> <p>In the event it is determined that Proposed Project could potentially affect listed plants, the CDFW shall be contacted to determine the need for a "take permit" under the California Endangered Species Act. Appropriate mitigation required to minimize or mitigate impacts to the listed plants shall be implemented and may include the following: the creation of a preserve, establishment of vegetated buffers or other setbacks, drainage modification of the adjacent areas, revegetation, and monitoring to ensure the success of the mitigation.</p>				

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<p><b>B-3: Pre-construction surveys and biological monitoring.</b></p> <p>Qualified biological monitor(s) shall be assigned to the project. Pre-construction biological clearance surveys shall be performed to minimize impacts on sensitive plants or wildlife species. The monitors will be responsible for ensuring that impacts to sensitive species, native vegetation, wildlife habitat, or unique resources will be avoided to the fullest extent possible. Where appropriate, monitors will flag the boundaries of areas where activities need to be restricted to protect native plants and wildlife, or sensitive species. These restricted areas shall be monitored to ensure their protection during construction. Planned sustained noise levels over 60 decibels (e.g., construction, park activities) will be evaluated by the County in relation to sensitive biological resources including nesting birds. The County will coordinate with USFWS and CDFW to determine if additional biological monitoring is required.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Qualified Biological Monitor</li> <li>• Construction Manager</li> </ul>	<p>Prior to issuance of a grading permit. Monitoring shall be conducted during ground disturbing activities.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• County of Los Angeles Department of Regional Planning (DRP)</li> <li>• California Department of Fish and Wildlife (CDFW)</li> <li>• United States Fish and Wildlife Service (USFWS)</li> </ul>	
<p><b>B-4: Conduct protocol surveys for California gnatcatcher and avoid occupied habitat.</b></p> <p>Prior to issuance of a grading permit, the County shall conduct protocol surveys for California gnatcatcher. A qualified biologist who is permitted by the USFWS to conduct surveys for California gnatcatcher shall conduct surveys in areas of suitable habitat to inform the planning process as each phase is developed. The surveys shall be conducted in accordance with the accepted USFWS survey protocol. If California gnatcatchers are identified within proposed work areas, agency coordination may be required.</p> <p>If construction activities occur during the breeding season in known occupied habitat for California gnatcatcher, focused surveys shall be conducted within the project site and adjacent areas within 500 feet. The surveys shall be of adequate duration to verify potential nest sites. These surveys</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Qualified Biologist</li> </ul>	<p>Surveys shall be conducted prior to issuance of grading permits for Phases I and II and prior to phase approval for Future Phases.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• County of Los Angeles Department of Regional Planning (DRP)</li> <li>• United States Fish and Wildlife Service (USFWS)</li> </ul>	

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<p>may be modified through the coordination with the agencies based on the condition of habitat, the observation of the species, or avoidance of coastal sage scrub areas during the breeding season.</p> <p>If a territory or nest is confirmed, a 500-foot disturbance-free buffer shall be established and demarcated by fencing or flagging. This buffer may be adjusted provided noise levels do not exceed 60 dB(A) hourly Leq at the edge of the nest site as determined by a qualified biologist in coordination with a qualified acoustician. If the noise meets or exceeds the 60 dB(A) Leq threshold, or if the qualified biologist determines that the construction activities are disturbing nesting activities, the qualified biologist shall have the authority to halt the construction and shall devise methods to reduce the noise and/or disturbance in the vicinity. This may include methods such as, but not limited to, turning off vehicle engines and other equipment whenever possible to reduce noise, installing a protective noise barrier between the nest site and the construction activities, and working in other areas until the young have fledged. If noise levels still exceed 60 dB(A) Leq hourly at the edge of nesting territories and/or a no-construction buffer cannot be maintained, construction shall be deferred in that area until the nestlings have fledged. All active nests shall be monitored on a weekly basis until the nestlings fledge. No construction shall occur within this buffer during the breeding season for these species.</p>				

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<p><b>B-5: Conduct nesting bird surveys to ensure that there would be not significant impacts to nesting birds and no violation of the Migratory Bird Treaty Act.</b></p> <p>A qualified biologist shall conduct nesting bird surveys prior to construction or site-preparation activities occurring during the nesting and breeding season of native bird species (typically February through August). The survey area shall include all potential bird nesting areas, including grasslands, scrub habitat, woodlands, and isolated trees that are within 500 feet of construction activities. The survey shall be conducted no more than three days prior to commencement of construction activities (i.e., grubbing or grading).</p> <p>If active nests of bird species protected by the Migratory Bird Treaty Act and/or the CFGC (2008) (which, together, apply to all native nesting bird species) are present in the construction zone or within 500 feet of the construction zone, a temporary buffer fence shall be erected a minimum of 300 feet around the nest site. This temporary buffer may be greater or lesser depending on the bird species and construction activity, as determined by the qualified biologist and/or applicable regulatory agency permits.</p> <p>Vegetation clearing and construction within temporarily fenced areas shall be postponed or halted until juveniles have fledged and there is no evidence of a second nesting attempt. The qualified biologist shall serve as a Construction Monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Qualified Biologist/Biological Monitor</li> <li>• Construction Manager</li> </ul>	<p>No more than 3 days prior to issuance of a grading permit if new construction activities are scheduled during the bird nesting season.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• County of Los Angeles Department of Regional Planning (DRP)</li> </ul>	
<p><b>B-6: Protection of sensitive vegetation communities.</b></p> <p>Prior to issuance of a grading permit, the County shall document the community type and acreage of vegetation that would be subject to project disturbance. Disturbance or removal of native vegetation shall not exceed the minimum</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Qualified Ecologist/Biologist</li> </ul>	<p>Prior to issuance of grading permits for Phases I and II and prior to phase approval for Future Phases.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	

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<p>necessary to complete operations. Every effort will be made to minimize vegetation removal and permanent loss at construction sites. If necessary, native vegetation would be flagged for protection. A project revegetation plan shall be prepared for areas of native habitat temporarily affected during construction.</p> <p>The USFWS and CDFW will be consulted on the project revegetation plan. Any impacts to special status species habitat will be evaluated to determine if an incidental take permit would be required.</p>			<ul style="list-style-type: none"> <li>County of Los Angeles Department of Regional Planning (DRP)</li> <li>California Department of Fish and Wildlife (CDFW)</li> <li>United States Fish and Wildlife Service (USFWS)</li> </ul>	
<p><b>B-7: Protection of oak trees.</b></p> <p>The County does not foresee any oak tree removals in Phases I or II of the Proposed Project. For Future Phases an oak tree permit will be obtained prior to cutting, destroying, removing, relocating, inflicting damage, or encroaching into the protected zone of any oak trees with a diameter at breast height (dbh) of eight inches or more. All protection and replacement measures shall be consistent with the Los Angeles County Oak Tree Ordinance.</p>	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	<p>Prior to issuance of a grading permit in Future Phases.</p>	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>County of Los Angeles Department of Regional Planning (DRP)</li> </ul>	
<p><b>B-8: Preparation of a landscaping plan.</b></p> <p>Prior to issuance of a grading permit, the County shall prepare a landscaping plan for the Proposed Project as part of the Master Plan. It shall include a plant palette derived from the existing Sanitation Districts approved plant palette for the landfill. The plant palette shall be composed of non-invasive species that are adapted to the conditions found on the project site and do not require high irrigation rates. The landscaping plan will also include a list of invasive plant species (e.g., California Invasive Plant Inventory Database online at <a href="http://www.cal-ipc.org/paf/">http://www.cal-ipc.org/paf/</a>) prohibited from being planted on the project site. In addition, retail sales of these invasive plant species will be prohibited at any businesses</p>	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>Qualified Landscape Architect</li> <li>Qualified Ecologist/Biologist</li> </ul>	<p>Prior to issuance of grading permits for Phases I and II and prior to phase approval for Future Phases.</p>	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>County of Los Angeles Department of Regional Planning (DRP)</li> <li>California Department of Fish and Wildlife (CDFW)</li> </ul>	

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<p>(nurseries) located within the project site. Landscape plans shall encourage planting of local natives typical of native vegetation within ten miles of the project site.</p> <p>The USFWS and CDFW will be consulted on the landscaping plan. Specifically, with regards to California gnatcatcher and wildlife, coastal sage scrub and other native vegetation communities will be established to the maximum extent possible, which includes areas within and adjacent to the Proposed Project. The establishment of the landscape will be in advance of any direct impacts to native vegetation communities to offset temporal loss of habitat for wildlife to preserve and enhance the existing wildlife corridor to the extent feasible. The landscaping plan will contribute to the connectivity of native habitats, including designated critical habitat for gnatcatcher, between the Rio Hondo Wildlife Sanctuary Significant Ecological Area (SEA) (Ecology Canyon) to the west and the Puente Hills SEAs including the conceptual Hacienda Hills SEA to the south and east and the overall Puente-Chino Hills Wildlife Corridor. The establishment of vegetative cover over the previously disturbed/developed areas will also support the dispersal of gnatcatcher from the Montebello Hills to the west as well as other wildlife through the project area.</p>			<ul style="list-style-type: none"> <li>United States Fish and Wildlife Service (USFWS)</li> </ul>	
<p><b>B-9: Placement of wildlife proof receptacles.</b></p> <p>Prior to issuance of a building permit the County shall provide waste and recycling receptacles and educational signage that discourage foraging by wildlife species adapted to urban environments. The receptacles shall be installed in common areas (i.e., any area where public trash receptacles would be placed, such as picnic areas, parking areas, and walking trails) throughout the project site. Additionally, educational signs shall be placed throughout the project site regarding: the importance of not feeding wildlife and information stating that trash (containing food) shall not be accessible to wildlife.</p>	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	<p>Prior to issuance of a building permit for each phase.</p>	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	

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<p><b>B-10: Implementation of public awareness program.</b></p> <p>Prior to issuance of a building permit, a public awareness program shall be designed and implemented in an effort to restrict public access to the native habitat areas on the project site to designated trails and to prevent unleashed domestic animals from entering these areas by the County. This program shall include: signs that identify the boundaries of ecologically sensitive areas; the use of temporary fencing around sensitive areas that appear to be receiving a high level of disturbance until the disturbance is reversed; and promotion of public education and awareness of such areas.</p> <p>Only passive recreational activities shall be permitted within the designated natural open space areas and shall be restricted to trails. Some areas may allow slightly greater impacts if designated as picnic areas. All dogs shall be required to be leashed while in the native habitats and natural open space areas.</p> <p>A plant nursery will be part of the educational component. Native and drought tolerant plants will be grown to actively replace and replant park areas requiring patching, repair, or re-construction due to landfill settling and bio-gas production. Ideal locations for bird observation and wildlife observation will be marked along particular trails. The public will be educated on the on-going functions of the landfill and the landfill slopes would be preserved, restored, and/or enhanced for wildlife.</p>	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	<p>Prior to issuance of a building permit for each phase.</p>	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	
<p><b>B-11: Maternity colony or hibernaculum surveys for roosting bats.</b></p> <p>Prior to issuance of a grading permit, the County shall conduct maternity colony or hibernaculum survey for roosting bats. A pre-activity (e.g., vegetation removal, grading) survey for roosting bats within 200 feet of project activities shall be conducted within 7 days prior to any grading of rocky</p>	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>Qualified Bat Biologist</li> </ul>	<p>No more than 7 days prior to issuance of a grading permit if new construction activities are scheduled during the maternity or hibernation seasons of bats.</p>	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>County of Los Angeles Department of Regional Planning (DRP)</li> </ul>	

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<p>outcrops or removal of trees (particularly trees 12 inches in diameter or greater at 4.5 feet above grade with loose bark or other cavities) within 200 feet of project activities.</p> <p>Conduct surveys for roosting bats during the maternity season (March 1 to July 31) within 300 feet of project activities. Trees and rocky outcrops shall be surveyed by a qualified bat biologist. Surveys shall include a minimum of one day and one evening.</p> <p>If active maternity roosts or hibernacula are found, the rock outcrop or tree occupied by the roost shall be avoided (i.e., not removed) by the Proposed Project, if feasible. For active roosts or hibernacula that are present in the construction zone or within 300 feet of the construction zone, a temporary buffer fence shall be erected a minimum of 100 feet around the roost or hibernacula site. This temporary buffer may be greater or lesser depending on the bat species and construction activity, as determined by the qualified biologist and/or applicable regulatory agency permits.</p> <p>If avoidance of the maternity roost is not feasible, the qualified bat biologist shall survey (through the use of radio telemetry or other CDFW approved methods) for nearby alternative maternity colony sites. If the qualified bat biologist determines in consultation with and with the approval of CDFW that there are alternative roost sites used by the maternity colony and young are not present then no further action is required, and it will not be necessary to provide alternate roosting.</p> <p>If impacts to the potential bat roosting habitat are unavoidable, or if the size, configuration, or complexity of a potential roost warrants additional surveys as determined by the qualified biologist, a one-night emergence survey (acoustic survey) will be conducted per roost to assess the species and population size. Note that night emergence</p>			<ul style="list-style-type: none"> <li>California Department of Fish and Wildlife (CDFW)</li> </ul>	

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<p>surveys to determine absence cannot be performed during the inactive period (between November 1 and February 15). All observations of sensitive species and occupied bat roosts will be reported to the County.</p> <p>Should a maternity roost be identified within the disturbance footprint and impacts cannot be avoided, and no alternative maternity roosts are in use near the site, substitute roosting habitat for the maternity colony will be provided on, or in close proximity to, the project site no less than 3 months prior to the eviction of the colony. Should a hibernaculum (i.e., non-breeding roost) be identified within the disturbance footprint and impacts cannot be avoided, passive humane eviction will be conducted in coordination with CDFW.</p>				
<p><b>B-12: Conduct pre-construction surveys for American badgers and passively relocate during the nonbreeding season.</b></p> <p>No more than 7 days prior to issuance of a grading permit, the County shall implement pre-construction surveys for American badgers within suitable habitat. If present, occupied badger dens shall be flagged and ground-disturbing activities avoided within 50 feet of the occupied den avoided. Maternity dens shall be avoided during pup-rearing season (February 15 through July 1) and a minimum 200-foot buffer established. Buffers may be modified with the concurrence of CDFW. Maternity dens shall be flagged for avoidance, identified on construction maps, and a biological monitor shall be present during construction. Any relocation of badgers shall occur only after consultation with the CDFW. A written report documenting the badger removal shall be provided to CDFW within 30 days of relocation.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Qualified Biologist/Biological Monitor</li> <li>• Construction Manager</li> </ul>	<p>No more than 7 days prior to issuance of a grading permit if new construction is scheduled during the maternity season of badgers.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• County of Los Angeles Department of Regional Planning (DRP)</li> <li>• California Department of Fish and Wildlife (CDFW)</li> </ul>	
<p><b>B-13: Prepare a Worker Environmental Awareness Program (WEAP).</b></p> <p>Prior to issuance of a grading permit, the County shall prepare a WEAP. All construction crews and contractors shall be required to participate in WEAP training prior to starting work</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Qualified Biological Monitor</li> </ul>	<p>Prior to issuance of a grading permit for each phase.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	

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on the project. The WEAP training will include a review of the sensitive species and other biological resources that could exist in the project area, the locations of the sensitive biological resources, their legal status and protections, and measures to be implemented for avoidance of these sensitive resources. A record of all personnel trained will be maintained.	<ul style="list-style-type: none"> <li>Construction Manager</li> </ul>			
<b>CULTURAL, TRIBAL, AND PALEONTOLOGICAL RESOURCES</b>				
<b>CR-1:</b> A worker education awareness program will be enacted to train construction workers about cultural resources. The Kizh Nation shall be provided an opportunity to review and contribute to the Worker Education Program. The program shall be designed to inform construction workers about what cultural resources are, state regulations pertaining to cultural resources, the authority of the monitors (when present) to halt construction in the event of a find, and penalties and repercussions from non-compliance with the program. Worker education training shall occur prior to initiation of any construction within the Nike Hill project area, and at regular intervals during the course of construction to train new hires and provide refresher training for existing workers, if needed. If appropriate, the worker education program shall be delivered in both English and Spanish.	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>Qualified Archeologist</li> </ul>	<p>The archaeological stop work clause shall be included in the bid specifications.</p> <p>Shall occur prior to the commencement of construction activities that would result in ground disturbing activities.</p>	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>Gabrieleeño Band of Mission Indians – Kizh Nation</li> </ul>	
<b>CR-2:</b> If subsurface deposits believed to be cultural in origin are discovered during construction, then all work must halt within a 200-foot radius of the discovery. A qualified professional archaeologist shall be retained to evaluate the significance of the find. Work cannot continue at the discovery site until the archaeologist conducts sufficient research and data collection to make a determination that the resource is either 1) not cultural in origin; or 2) not potentially significant or eligible for listing on the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR). If a potentially-eligible resource is encountered, then the archaeologist, lead agency, and project proponent shall	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>Qualified Professional Archeologist</li> <li>Construction Manager</li> </ul>	Shall be implemented if subsurface deposits believed to be cultural in origin are discovered during construction.	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	

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arrange for either 1) total avoidance of the resource, if possible; or 2) test excavations to evaluate eligibility for the CRHR and, if eligible, data recovery as mitigation.				
<b>CR-3:</b> If human remains of any kind are found during construction activities, all activities must cease immediately and the Los Angeles County Coroner must be notified, as required by state law (Section 7050.5 of Health and Safety Code). If the coroner determines the remains to be of Native American origin, he or she will notify the Native American Heritage Commission (NAHC). The NAHC will then identify the most likely descendant(s) (MLDs) to be consulted regarding treatment and/or reburial of the remains (Section 5097.98 of the Public Resources Code). Work may resume once the MLD's recommendations have been implemented or the remains have been reburied by the landowner if no agreement can be reached with the MLD (Section 5097.98 of the Public Resources Code).	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Construction Manager</li> <li>• Los Angeles County Coroner</li> </ul>	Shall be implemented if human remains are discovered during construction.	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Native American Heritage Commission (NAHC)</li> </ul>	
<p><b>CR-4:</b> In the Nike Hill area, a qualified paleontological monitor under the supervision of a qualified vertebrate paleontologist shall monitor excavations into the Pleistocene alluvium, as well as any deeper excavations into the Puente Formation and the Fernando Formation. Sediment samples shall be collected and processed to determine the small fossil potential in the project area. The monitor will be equipped to recover fossils and sediment samples during excavation and will have the authority to temporarily halt or divert equipment to allow for recovery of large or numerous fossils.</p> <p>Any fossils recovered during monitoring shall be prepared to a point of identification and preservation and be deposited in an accredited and permanent scientific institution. A report detailing the findings with an appended itemized inventory of identified specimens shall be prepared by a qualified vertebrate paleontologist. The report and inventory shall be submitted to the Los Angeles County Department of Parks and Recreation (DPR) and the scientific institution where the</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Qualified Paleontological Monitor</li> </ul>	Shall be implemented during ground disturbing activities in the Nike Hill area.	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	

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fossils are deposited. When DPR receives the report, inventory, and verification of acceptance of the specimens by the scientific institution, mitigation will be complete.				
<p><b>TCR-1:</b> Ground-disturbing activities within the non-fill portions of the project area (Entry Plaza, Maintenance Yard, Nike Hill, and the Flare Site) shall be monitored by a qualified archaeological monitor. The archaeological monitor shall have the authority to temporarily halt construction operations within 50 feet of an archaeological resource to determine if significant or potentially significant resources will be adversely affected by continuing construction operations. The archaeological monitor shall use flagging tape, rope, or some other means, as necessary, to delineate the area of the find within which construction shall halt and the procedures outlined below shall apply. Construction shall not take place within the delineated find area until the County consults on appropriate treatment. The County shall have ultimate authority over the treatment of new finds while complying with all rules and regulations. Any work in other areas of the project area, which involves earth-moving activity in previously undisturbed native soils, should be monitored by, at a minimum, workers that have received cultural resource training pursuant to a cultural resources management plan and worker education and awareness program.</p> <p>If subsurface deposits believed to be cultural or human in origin are discovered during construction, then all work must halt within a 50-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Qualified Archaeological Monitor</li> <li>• Qualified Professional Archaeologist</li> <li>• Construction Manager</li> <li>• Los Angeles County Coroner</li> </ul>	<p>Shall be implemented during ground-disturbing activities within the non-fill portions of the project area (Entry Plaza, Maintenance Yard, Nike Hill, and the Flare Site).</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• San Gabrieleño Band of Mission Indians – Kizh Nation</li> <li>• Native American Heritage Commission (NAHC)</li> </ul>	

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<p>If the professional archaeologist determines that the find does not represent a cultural resource, then work may resume immediately and no agency notifications are required.</p> <p>If the qualified professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, then he or she shall immediately notify the County of Los Angeles. If the find is considered eligible for the California Register of Historical Resources (CRHR) and impacts to the resource cannot be avoided, then Project Archaeologist will notify the County and will recommend appropriate mitigation measures in compliance with the California Environmental Quality Act (CEQA) and federal regulations, if applicable (up to and including possible data recovery). The agencies shall consult on a finding of eligibility and implement appropriate treatment measures. No construction can occur within the flagged-off area until the professional archaeologist determines that either the site is not significant or that the treatment measures, as determined through consultation between the professional archaeologist and the County, have been completed to their satisfaction.</p> <p>If the find represents a Native American or potentially Native American or tribal cultural resource that does not include human remains, then the County shall further notify the Kizh Nation. The agencies shall consult with the tribe on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be eligible for inclusion in the CRHR. Work cannot resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not eligible for the CRHR; or 2) that the treatment measures have been completed to the satisfaction of the consulting parties.</p> <p>If the find includes human remains, or remains that are potentially human, then the professional archaeologist shall ensure reasonable protection measures are taken to protect</p>				

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<p>the discovery from disturbance (per AB 2641). The archaeologist shall notify the Los Angeles County Coroner (per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California Public Resources Code, and Assembly Bill 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime, then the Coroner will notify the Native American Heritage Commission, which then will designate a Native American Most Likely Descendant (MLD) for the project (Section 5097.98 of the Public Resources Code), which may or may not be a representative of the Kizh Nation. The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, then the NAHC can mediate (Section 5097.94 of the Public Resources Code). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the Public Resources Code). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the County (AB 2641). Work cannot resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.</p>				
<p><b>TCR-2:</b> Ground-disturbing activities within the non-fill portions of the project area (Entry Plaza, Maintenance Yard, Nike Hill, and the Flare Site) shall be monitored by one tribal monitor representing the Kizh Nation. The tribal monitor shall have the authority to temporarily halt construction operations within 50 feet of a TCR or a potential TCR to determine if significant or potentially significant resources will be adversely affected by continuing construction operations. The tribal monitor shall use flagging tape, rope, or some other means, as necessary, to delineate the area of the find within which</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Tribal Monitor</li> </ul>	<p>Shall be implemented during ground-disturbing activities within the non-fill portions of the project area (Entry Plaza, Maintenance Yard, Nike Hill, and the Flare Site).</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Gabrieleño Band of Mission Indians – Kizh Nation</li> </ul>	

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<p>construction shall halt and the procedures in TCR-1 shall apply. Construction shall not take place within the delineated find area until the County consults on appropriate treatment. Tribal monitors may suggest options for treatment of finds for consideration. Tribal monitors must obtain permission from the County to harvest native plants in a sustainable manner within the project area that are deemed important to the Kizh Nation. The County shall have ultimate authority over the treatment of new finds while complying with all rules and regulations.</p>				
<b>GEOLOGY AND SOILS</b>				
<p><b>G-1:</b> A qualified geotechnical firm shall conduct site-specific geotechnical investigations during the design of each project component. Activities related to the geotechnical investigation shall be coordinated with the Sanitation Districts to avoid conflicts with landfill operations and maintenance activities. The geotechnical firm shall review the site and grading plans for each project as the PHLPMP is implemented and to determine the specific geotechnical hazards for each project. Geotechnical investigations shall 1) evaluate the subsurface conditions at the site; 2) provide site-specific data regarding potential geologic hazards and geotechnical constraints; and 3) provide information pertaining to the engineering characteristics of earth materials with regard to project improvements and building and tower foundation design 4) provide recommendations for earthwork, foundations, pavements and other pertinent geotechnical design considerations. The detailed geotechnical evaluation may include the following, as applicable:</p> <ul style="list-style-type: none"> <li>• Large-diameter bucket auger borings to evaluate geologic conditions for slope stability at the Entry Plaza, Trail Lift Tower locations, and Flare Site, and to evaluate geotechnical engineering properties for tower foundation design;</li> <li>• Backhoe test pits to evaluate the presence of landfill</li> </ul>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Qualified Geotechnical Firm</li> </ul>	<p>Shall be implemented during the design of each project component.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Sanitation Districts of Los Angeles County</li> </ul>	

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<p>waste materials in the area of the new structures where they are near the boundary of the waste limits;</p> <ul style="list-style-type: none"> <li>Slope stability analyses to evaluate the stability of the adjacent graded and natural slopes near proposed structural improvements, including the evaluation of possible effects to the western Nike Hill slope buttress; and</li> <li>Geotechnical engineering analyses to develop pile foundation parameters for buildings and trail lift towers.</li> </ul>				
<b>GREENHOUSE GAS</b>				
<b>GHG-1:</b> The Proposed Project will include trails/sidewalks within the project boundary that will connect to roads leading off-site.	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	Shall be implemented during the design of each project component.	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	
<b>GHG-2:</b> All building structures will be required to meet or exceed 2013 Title 24, Part 6 Building Energy Efficiency Standards and meet Green Building Code Standards.	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	Shall be implemented during the design of each project component.	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	
<b>GHG-3:</b> All faucets, toilets, and showers to be installed in the proposed structures will be required to utilize low-flow fixtures to reduce indoor water demand by at least 20 percent per CalGreen Standards.	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	Shall be implemented during the design of each project component.	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	
<b>GHG-4:</b> ENERGY STAR-compliant appliances will be installed where appliances are required on-site.	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	Shall be implemented during the design of each project component.	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	
<b>GHG-5:</b> The Proposed Project will include recycling programs that will reduce waste to landfills by a minimum of 50 percent (up to 75 percent by 2020 per AB 341).	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	Shall be implemented during construction and operation of the Proposed Project.	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	
<b>HAZARDS AND HAZARDOUS MATERIALS</b>				
<b>HAZ-1:</b> During the design process for any new building or structure, the County shall prepare a report in accordance with the most recent version of the Los Angeles County Department of Public Works (DPW) Landfill Gas Protection Policy. At a minimum, the report shall detail the measures recommended to minimize possible landfill gas intrusion and	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>California Registered Civil Engineer</li> </ul>	Shall be implemented during the design of each project component.	<ul style="list-style-type: none"> <li>County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>County of Los Angeles Department of Public Works (DPW)</li> </ul>	

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prevent explosive concentrations of decomposition gases within or under enclosed portions of the building or structure. This report shall be prepared by a California Registered Civil Engineer. At the time of final inspection the civil engineer shall furnish a signed statement attesting that the building or structure has been constructed in accordance with the civil engineer's recommendation. Methane detectors and monitoring equipment shall be installed in structures as required by the most recent version of DPW Landfill Gas Protection Policy and the site-specific report. Monitoring and reporting shall occur by DPR at the frequency recommended the most recent version of DPW Landfill Gas Protection Policy and the site-specific report.				
<b>HAZ-2:</b> If groundwater is encountered during construction, all construction activities in the vicinity shall immediately cease until a construction dewatering discharge permit can be obtained from the Los Angeles Regional Water Quality Control Board.	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Construction Manager</li> </ul>	Shall be implemented if groundwater is encountered during construction.	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Los Angeles Regional Water Quality Control Board (LARWQCB)</li> </ul>	
<b>HAZ-3:</b> Prior to construction of each phase, a Soil Management Plan and site-specific health and safety plan, detailing worker safety, vapor monitoring, soil testing, and soil removal shall be prepared for the project.	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Construction Manager</li> </ul>	Shall be implemented prior to the construction of each phase.	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• County of Los Angeles Department of Public Works (DPW)</li> <li>• County of Los Angeles Department of Public Health (DPH)</li> </ul>	
<b>NOISE</b>				
<b>N-1:</b> In addition to adherence to the City of Industry's policies found in the Safety Element and Municipal Code (the City's policies are more stringent than the County's policies) limiting the construction hours of operation, the following measures	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	Shall be implemented during project construction.	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	

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<p>are recommended to reduce construction noise and vibrations, emanating from the Proposed Project:</p> <ol style="list-style-type: none"> <li>1. During all project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards.</li> <li>2. The contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site.</li> <li>3. Equipment shall be shut off and not left to idle when not in use.</li> <li>4. The contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise/vibration sources and sensitive receptors nearest the project site during all project construction.</li> <li>5. Jackhammers, pneumatic equipment and all other portable stationary noise sources shall be shielded and noise shall be directed away from sensitive receptors.</li> </ol>	<ul style="list-style-type: none"> <li>• Construction Manager</li> </ul>			
<b>PUBLIC SERVICES</b>				
<p><b>PS-1:</b> The special event operator will coordinate with the Los Angeles County Fire Department (LACFD) in its preparation and implementation of a Fire Incident Plan describing the fire inspection and protection services to be provided by the LACFD and identifying the number of fire department personnel to be provided, including fire suppression/emergency medical service (EMS), fire prevention (fire inspectors), emergency communications, and supervisory personnel. The special event operator shall reimburse the County of Los Angeles (County) for fire inspection and protection services provided under the Fire Incident Plan, pursuant to the reimbursement agreement with the County to be entered into in connection with the special event permit.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Special Event Operator</li> </ul>	<p>Shall be implemented prior to the issuance of the special event permit.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Los Angeles County Fire Department (LACFD)</li> </ul>	

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The Fire Incident Plan will also identify fire suppression equipment, supplies and other services to be provided by the special event operator during future festivals, including the number of fire suppression mobile carts. The number of fire suppression mobile carts required will be determined by the LACFD based on the site plan for future special events.				
<b>PS-2:</b> Prior to the commencement of each special event, the special event operator will prepare and submit a Private Security Plan for review and approval by the Los Angeles County Sheriff's Department (LASD) describing all private security services to be provided and paid for by the special event operator. The Private Security Plan will identify the number of private security personnel to be provided and how these resources will be deployed and supervised.	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Special Event Operator</li> </ul>	Shall be implemented prior to the issuance of the special event permit.	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Los Angeles County Sheriff's Department (LASD)</li> </ul>	
<b>PS-3:</b> The special event operator will coordinate with the Los Angeles County Sheriff's Department (LASD) in its preparation and implementation of an Operations Plan establishing the sheriff protection services to be provided by the County of Los Angeles to supplement the private security being provided by the special event operator. The special event operator will reimburse the County for sheriff protection services provided under the Operations Plan, pursuant to the reimbursement agreement with the County to be entered into in connection with the special event permit.	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Special Event Operator</li> </ul>	Shall be implemented prior to the issuance of the special event permit.	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Los Angeles County Sheriff's Department (LASD)</li> </ul>	
<b>PS-4:</b> Prior to the construction and use of the park access road by Rose Hills Memorial Park, the County, the Sanitation Districts of Los Angeles County, and Rose Hills Memorial Park will enter into a tri-party agreement (as more fully described under Mitigation Measure T-1) which will include a means for Rose Hills Memorial Park to fund in perpetuity its proportionate share of financial impacts of the increased costs for public services provided by the LASD Park Bureau, and DPR to ensure protection of public safety, ease of public access to the Park, and minimal interference with park uses.	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Sanitation Districts of Los Angeles County</li> <li>• Rose Hills Memorial Park</li> </ul>	Shall be implemented prior to the construction and use of the park access road by Rose Hills Memorial Park.	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Sanitation Districts of Los Angeles County</li> <li>• Los Angeles County Sheriff's Department (LASD), Parks Bureau</li> </ul>	

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<p><b>PS-5:</b> A staffing assessment and safety plan will be prepared by the LASD to determine the demand for additional sheriff personnel and support services for each phase of the Proposed Project, whereby DPR will be responsible to fund its proportionate share of financial impacts for the increased costs of public services provided by LASD. The staffing assessment and safety plan shall be reevaluated at the commencement of each project phase.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Los Angeles County Sheriff's Department (LASD)</li> </ul>	<p>Shall be implemented prior to the implementation of each phase of the Proposed Project.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Los Angeles County Sheriff's Department (LASD)</li> </ul>	
<p><b>TRANSPORTATION AND CIRCULATION</b></p>				
<p><b>T-1:</b> Prior to the construction and use of the access road by Rose Hills Memorial Park, the County, the Sanitation Districts of Los Angeles County (Sanitation Districts), and Rose Hills Memorial Park (Rose Hills) will enter into a tri-party agreement setting forth each of the parties rights and responsibilities for the construction, maintenance, and use of the access road and any extension or modifications thereto.</p> <p>The tri-party agreement will include funding for public service expenses per Mitigation Measure PS-4, as well as related access road management issues including, but not limited to:</p> <ul style="list-style-type: none"> <li>• The number of proposed funeral processions that would utilize the Rose Hills Memorial Park access road easement, the size of such processions, and the allowable schedule for all such processions.</li> <li>• Traffic management measures for all such funeral processions designed to ensure compatibility with park uses, including avoidance of peak park use periods.</li> <li>• Roadway maintenance protocols such as inspections, maintenance actions, scheduling, and other factors designed to allocate cost to all parties proportionally based on their share of impact on the road.</li> <li>• Improvements to the park entrance to minimize traffic and operational conflicts with the Sanitation Districts and Rose Hills, such as signage, lighting, and roadway improvements.</li> <li>• Agreements relative to implementation of Mitigation Measures T-2, T-3, T-4, and T-5.</li> </ul>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Sanitation Districts of Los Angeles County</li> <li>• Rose Hills Memorial Park</li> </ul>	<p>Shall be implemented prior to the construction and use of the park access road by Rose Hills Memorial Park.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Sanitation Districts of Los Angeles County</li> </ul>	

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<p><b>T-2:</b> No Rose Hills funeral processions shall occur on the shared access road on days with scheduled performance events (e.g. concerts, festivals) to avoid traffic congestion at the park entry and to improve safety to park users. Performance events are estimated to occur up to 25 times per year. The County shall inform Rose Hills of such events pursuant to the terms of the tri-party agreement.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Rose Hills Memorial Park</li> </ul>	<p>Shall be implemented during project operation.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	
<p><b>T-3:</b> During the design and construction by Rose Hills of any extension to the shared access road to connect to the Rose Hills property, Rose Hills shall fund the design and construction of a trail crossing at the intersection with the Schabarum-Skyline Trail to permit trail users to safely navigate funeral processions and vehicular traffic. The trail crossing shall be designed as either a grade-separated or at-grade crossing, but in either case it shall optimize safety for both trail users and vehicular traffic. It shall be wide enough and of a gentle grade to safely accommodate equestrians, other trail users, and wildlife passage as appropriate. Safety fencing, signage, equestrian waiting area, push button signal actuators for equestrians, landscape screening, earthen surfaces or other non-slip materials, and other techniques may be employed to ensure trail user safety. The crossing shall be designed per the current County of Los Angeles Trail Manual (adopted May 17, 2011 and as revised). The Trail Manual includes provisions for both grade-separated and at-grade crossings of multi-use trails with roadways. The crossing shall also be designed per U.S. Forest Service requirements for equestrian crossings. The design shall be approved by the County's Department of Public Works and Department of Parks and Recreation prior to construction. The requirements of this mitigation measure shall become part of the tri-party agreement to be entered to among the County, the Sanitation Districts, and Rose Hills.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Sanitation Districts of Los Angeles County</li> <li>• Rose Hills Memorial Park</li> </ul>	<p>Shall be implemented prior to the construction and use of the park access road by Rose Hills Memorial Park.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Sanitation Districts of Los Angeles County</li> <li>• County of Los Angeles Department of Public Works (DPW)</li> </ul>	

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<p><b>T-4:</b> Rose Hills shall provide at least 24 hours advance notice to DPR staff for funeral processions that will travel through the Park to reach the Rose Hills property, including the estimated time of arrival. Rose Hills shall either ensure the presence of trained motorcade escorts with each funeral procession or fund deployment of County traffic enforcement personnel to ensure protection of public safety, ease of public access to the Park, and minimal interference with Park users. These measures shall apply to Alignment Alternatives 1, 2, and 3 for the Rose Hills access road. The requirements of this mitigation measure may become part of the tri-party agreement to be entered to among the County, the Sanitation Districts, and Rose Hills.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Sanitation Districts of Los Angeles County</li> <li>• Rose Hills Memorial Park</li> </ul>	<p>Shall be implemented at least 24 hours prior to funeral processions using the Rose Hills easement through the park.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> </ul>	
<p><b>T-5:</b> To maintain emergency access and minimize potential conflicts with park users, the park access road between Crossroads Parkway South and the Visitor Center, and between the Visitor Center and the point at which the park loop road begins, shall be configured to accommodate shoulder space for inbound vehicles to pull over and allow emergency service vehicles to safely pass. The Rose Hills access road shall be designed to appropriate County standards, Fire Department requirements, which shall be subject to review and approval by the Department of Public Works and the Department of Parks and Recreation. These measures shall apply to Alignment Alternatives 1, 2 and 3 for the Rose Hills access road.</p> <p>At the narrow section between the Visitor Center and the point at which the park loop road begins, the multi-use trail surface will be designed and constructed to allow for inbound funeral processions under direction of trained motorcade escorts or County traffic enforcement personnel to temporarily pull over onto the trail to allow emergency vehicles to pass. The trained motorcade escorts or County traffic personnel shall ensure safety of trail users during these emergency conditions. These measures apply to Alignment Alternatives 1, 2 and 3 for the Rose Hills access road.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Rose Hills Memorial Park</li> </ul>	<p>Shall be implemented prior to the construction of any park improvements.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• County of Los Angeles Department of Public Works (DPW)</li> <li>• Los Angeles County Fire Department (LACFD)</li> </ul>	

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FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

MITIGATION MEASURES	RESPONSIBLE FOR IMPLEMENTATION	TIMING OF IMPLEMENTATION	MONITORING AGENCY	DATE COMPLETED
<p><b>T-6:</b> The County shall ensure that event permittees prepare and implement Traffic Management Plans (TMPs) for special events which will identify potential off-site parking location(s) and ways to bring event-goers from these location(s) to the park and identify the primary routes of travel to ensure efficient vehicle traffic movement and control between the I-605, SR-60, and adjacent roadways and the Proposed Project. The plans will designate the routes for entry and exit, signage placement along these routes, temporary street closures, and other special traffic management procedures, such as use of traffic control personnel to direct traffic at key intersections. The staffing levels and locations of law enforcement officers, including security, traffic, and parking personnel will also be identified to assist with the control of the roadways. Each TMP shall be tailored to the specific special event and approved prior to the start of the event.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Special Event Operator</li> </ul>	<p>Prior to the start of each event.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• County of Los Angeles Department of Public Works (DPW)</li> <li>• Los Angeles County Sheriff's Department (LASD)</li> <li>• California Department of Transportation (Caltrans)</li> </ul>	
<p><b>T-7:</b> A Construction Traffic Management Plan (Construction TMP) shall be prepared and implemented by the County prior to and during construction of any park improvements. The Construction TMP shall require prior notices, adequate sign-posting, detour, phased construction and temporary driveways where necessary to reduce construction-related impacts that may result from the Proposed Project. The Construction TMP shall also identify any haul routes for earth, concrete, or construction materials and equipment. The Construction TMP shall be subject to review and approval by the following County departments: Public Works, Fire, Regional Planning, and Sheriff prior to issuance of grading or building permits.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• Construction Manager</li> </ul>	<p>Prior to the issuance of grading or building permits.</p> <p>Shall be implemented prior to and during the construction of any park improvements.</p>	<ul style="list-style-type: none"> <li>• County of Los Angeles Department of Parks and Recreation (DPR)</li> <li>• County of Los Angeles Department of Public Works (DPW)</li> <li>• County of Los Angeles Department of Regional Planning (DRP)</li> <li>• Los Angeles County Sheriff's Department (LASD)</li> <li>• Los Angeles County Fire Department (LACFD)</li> </ul>	

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