

Final Environmental Impact Report
Foothill Trunk Line Unit 3 Project



Los Angeles Department of Water and Power
Environmental Services
111 North Hope Street, Room 1044
Los Angeles, California 90012

June 2014

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CHAPTER 1

Introduction

This Final Environmental Impact Report (Final EIR) has been prepared in conformance with the environmental policy guidelines for the implementation of the California Environmental Quality Act (CEQA) to evaluate the environmental effects that may result from the Foothill Trunk Line Unit 3 Project, in the City of Los Angeles.

According to *CEQA Guidelines*, Section 15132, the Final EIR shall consist of:

- (a) The Draft EIR or a revision of the Draft;
- (b) Comments and recommendations received on the Draft EIR, either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
- (d) The responses of the lead agency to significant environmental points raised in the review and consultation process;
- (e) Any other information added by the lead agency.

This document contains responses to comments received on the Draft EIR for the proposed project during the public review period which began March 21, 2014, and closed May 5, 2014. This document has been prepared in accordance with CEQA and the *CEQA Guidelines*, and represents the independent judgment of the lead agency, the Los Angeles Department of Water and Power (LADWP). This document and the circulated Draft EIR comprise the Final EIR in accordance with *CEQA Guidelines*, Section 15132.

1.1 Format of the Final EIR

The following chapters are contained within this document:

Chapter 1, Introduction. This chapter describes CEQA requirements and the content of the Final EIR.

Chapter 2, Response to Comments. This chapter provides a list of agencies, organizations and interested individuals who commented on the Draft EIR, as well as copies of their comment letters received during the public review period, and individual responses to their comments. To facilitate review of the responses, each comment has been assigned a number. Each comment has been numbered for each letter, and the letter is followed by responses with references to the corresponding comment number.

Chapter 3, Revisions to the Draft EIR. This chapter contains revisions made to the Draft EIR as a result of the comments received by agencies, organizations and individuals as described in Chapter 3, and/or errors and omissions discovered subsequent to release of the Draft EIR for public review.

LADWP has determined that none of this material constitutes significant new information that requires recirculation of the Draft EIR for further public comment under *CEQA Guidelines* Section 15088.5. The additional material clarifies existing information prepared in the Draft EIR, and does not present any new substantive information. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the Draft EIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

Chapter 4, Mitigation, Monitoring, and Reporting Program. This chapter includes the Mitigation Monitoring and Reporting Program (MMRP). CEQA requires lead agencies to “adopt a reporting and mitigation monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment” (CEQA §21081.6, *CEQA Guidelines* §15097). The MMRP was prepared based on the mitigation measures included in this Final EIR and has been included as Chapter 4.0.

1.2 CEQA Requirements Regarding Comments and Responses

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be “*on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible ... CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.*”

CEQA Guidelines Section 15204(c) further advises, “*Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.*” Section 15204 (d) also states, “*Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.*”

Section 15204 (e) states, *“This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”*

In accordance with CEQA, Public Resources Code (PRC) Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certification of the environmental impact report. The responses will be forwarded with copies of this Final EIR document, as permitted by CEQA, and will conform to the legal standards established for response to comments on the Draft EIR.

CHAPTER 2

Response to Comments

Section 15088 of the *CEQA Guidelines* requires the lead agency, the Los Angeles Department of Water and Power (LADWP), to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft EIR and prepare written responses. This section provides all written responses received on the Draft EIR and the LADWP responses to each comment. Comment letters and specific comments are given letters and numbers for reference purposes.

The following is a list of agencies, organizations and individuals that submitted comments on the Draft EIR during the public review period. Comments received on the Draft EIR and responses to those comments are shown on the following pages.

Reference	Agency/Organization/Resident Name	Date of Comment
Individuals		
A	Angelica Friedlander/A Factory Outlet	April 23, 2014
B	Mike Gonzales/Pacoima Neighborhood Council	April 23, 2014
C	Jack Hendershot/Drapes 4 Show, Inc.	April 23, 2014
D	Susie Bebay/United Truck Centers, Inc.	April 23, 2014
E	Marco Flores	April 23, 2014
Agencies		
F	Matthew Dubiel/ LA County Dept. of Public Works	May 5, 2014
G	Scott Morgan/Governor's Office of Planning, State Clearing House and Planning Unit	May 6, 2014
H*	Ali Poosti City of Los Angeles, Bureau of Sanitation	April 30, 2014

* Denotes comment letters received after the close of the public comment period.

COMMENT CARD

Foothill Trunk Line Unit 3 Project

Written comments may be submitted tonight during the Draft EIR public meeting or mailed/mailed to Irene Paul. Comments on the Draft EIR must be received no later than May 5, 2014.

Los Angeles Department of Water and Power
Attn: Irene Paul
111 North Hope Street, Room 1044
Los Angeles, California 90012
Irene.Paul@ladwp.com



I have the following comments on the Draft Environmental Impact Report (EIR) for the subject project:

I AM a business owner on FOOTHILL
BLVD. I AM VERY CONCERNED WITH
CUSTOMER TRAFFIC IN AND OUT OF
OUR BUSINESS and delivery to the
REAR OF OUR BUSINESS. PICK UPS FROM
Freight companies. I would like to
be involves in the planning FOR MY
AREA.

1

Name: Angelica Friedlander

Affiliation/Organization:

A FACTORY OUTLET

Address: 12907 Foothill Blvd

Phone: (818) 433-9566

(818) 287-6002

ext.

107

Response to Letter A

A-1 The commenter states the commenter is a business owner and is concerned with customer traffic in and out of the business and deliveries to the business. The commenter would like to be involved in the planning for their business area.

LADWP is working with the Los Angeles Department of Transportation (LADOT) to ensure impacts associated with project implementation will be minimized through the development of a traffic control plan approved by LADOT. LADWP is willing to meet with the business owner prior to completing the traffic control design and drawings.

The commenter is referred to Mitigation Measures TR-1 through TR-4 for the specific mitigation requirements of the traffic control plan.

COMMENT CARD

Foothill Trunk Line Unit 3 Project

Written comments may be submitted tonight during the Draft EIR public meeting or mailed/mailed to Irene Paul. Comments on the Draft EIR must be received no later than May 5, 2014.

Los Angeles Department of Water and Power
Attn: Irene Paul
111 North Hope Street, Room 1044
Los Angeles, California 90012
Irene.Paul@ladwp.com



I have the following comments on the Draft Environmental Impact Report (EIR) for the subject project:

Why was it the Pacoima Neighborhood Council informed? The ^{45 day} period for public comments was ~~not~~ implemented poorly. There is no evidence or minutes showing DWP presented or outreached to the Pacoima Neighborhood Council.

1
2
3

Name: Mike Gonzales

Affiliation/Organization:

Pacoima Neighborhood Council

Address: 16445 Lewan Ave Pacoima

Phone: 323 718 1501

Response to Letter B

- B-1** The commenter asks why the Pacoima Neighborhood Council wasn't notified of the Draft EIR.

On March 21, 2014 a Notice of Availability was sent to the Pacoima Neighborhood Council, advising of the availability of the Draft EIR for public review as well as the Public Meeting.

The Public Meeting was held on April 23, 2014 from 6:30 to 8:30 PM at the Pacoima City Hall located at 13520 Van Nuys Boulevard, Pacoima, CA 91331.

- B-2** The commenter states the 45-day public comment review period was poorly implemented.

On March 21, 2014 a Notice of Availability was sent to the Pacoima Neighborhood Council, advising of the availability of the Draft EIR for public review as well as the Public Meeting.

Notices of Availability of the Draft EIR were mailed to approximately 1,200 individual owners and occupants located near the project site. Additionally, a Notice of Availability was published in the Los Angeles Times on March 21, 2014, informing the public of the 45-day public review period. A handout noticing the Foothill Trunk Line Unit 3 Public Meeting was provided to the attendees of the Sylmar Neighborhood Council meeting on March 24, 2014.

- B-3** The commenter states there is no evidence or minutes showing the LADWP presented or outreached to the Pacoima Neighborhood Council.

On March 21, 2014, a Notice of Availability was sent to the Pacoima Neighborhood Council, advising of the availability of the Draft EIR for public review as well as the Public Meeting.

The Public Meeting was held on April 23, 2014 from 6:30 to 8:30 PM at the Pacoima City Hall located at 13520 Van Nuys Boulevard, Pacoima, CA 91331.

COMMENT CARD

Foothill Trunk Line Unit 3 Project

Written comments may be submitted tonight during the Draft EIR public meeting or mailed/emailed to Irene Paul. Comments on the Draft EIR must be received no later than May 5, 2014.

Los Angeles Department of Water and Power
Attn: Irene Paul
111 North Hope Street, Room 1044
Los Angeles, California 90012
Irene.Paul@ladwp.com



I have the following comments on the Draft Environmental Impact Report (EIR) for the subject project:

Concern with traffic plan and how it will
affect access to properties for products
deliveries etc

Would appreciate advance look su to
tentative plans and traffic plans

Name: *Lack Henderson*
Address: *12811 Foothill Bl*

Affiliation/Organization: *Drapis Show, Inc*
Phone:

Response to Letter C

C-1 The commenter is concerned with traffic and its impact on properties and deliveries.

LADWP is working with the LADOT to ensure impacts associated with project implementation will be minimized through the development of a traffic control plan approved by LADOT.

The commenter is referred to Mitigation Measures TR-1 through TR-4 for the specific mitigation requirements of the traffic control plan.

C-2 The commenter would like the opportunity to look at tentative plans and traffic plans.

The project team is working with LADOT to develop traffic control plans to ensure continued access to their business. The project team will be available to discuss with the business community along Foothill Boulevard the traffic control measures and construction sequence once they are further developed.

COMMENT CARD

Foothill Trunk Line Unit 3 Project

Written comments may be submitted tonight during the Draft EIR public meeting or mailed/mailed to Irene Paul. Comments on the Draft EIR must be received no later than May 5, 2014.

Los Angeles Department of Water and Power
 Attn: Irene Paul
 111 North Hope Street, Room 1044
 Los Angeles, California 90012
Irene.Paul@ladwp.com



I have the following comments on the Draft Environmental Impact Report (EIR) for the subject project:

UNITED TRUCK CENTERS - INC.
 13101 FOOTHILL BLVD. SIMMAR, CA. 91342
 818-837-4595 - SUSIE BEBAWY

ISSUE: My business is a Heavy Duty Truck Dealership - My concern is vehicle - Truck Access. Since my clients are operate Medium & Heavy Duty trucks - my site is located right @ Foothill & MacLay at the very beginning of the intersection -

I WOULD APPRECIATE A SITE VISIT.

Name: Susie Bebaawy Affiliation/Organization: United TRUCK ^{Centers}

Address: 13101 Foothill Blvd. and 12443 Foothill Blvd. Phone: 818-837-4595 818-253-5486

Response to Letter D

D-1 The commenter states her business is a heavy duty truck dealership.

The comment is noted. The comment is included in the administrative record and provided to City decision-makers for their consideration in conjunction with their deliberations regarding the Final EIR and the proposed project.

D-2 The commenter is concerned because the business site is located at the corner of Foothill and McClay and would appreciate a site visit.

On May 8, 2014, representatives from LADWP and Council District No. 7, met with Ms. Bebay at her request.

Based on the site visit discussion, the jacking pit locations may change in order to reduce the number of impacted/closed driveways along Foothill. All five intersections will still remain open and accessible by all types of vehicles. However, the configuration of each intersection and the traffic flow through each one may change depending on the final location of the jacking pits.

April 23, 2014

Foothill Trunk Line Unit 3 Project

Los Angeles Department of Water and Power

Pacoima City Hall
13520 Van Nuys
Boulevard
Pacoima, CA 91331

**Draft EIR Public Meeting
Speaker Registration Card**

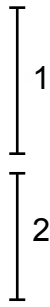
Please complete and return to staff

Marco Flores
Name (Print)

Agency (if applicable)

12378 Gladstone av Sylmar 91342
Address City Zip Code
(818) 216-2967 masantillan@aol.com
Phone Number Email

- ~~What are the~~
- When is the project going to begin between the streets Arroyo & Foothill blvd ?
- ~~Are~~ the intersections going to be closed completely ?



Response to Letter E

E-1 The commenter asks when the project will be at Arroyo and Foothill Boulevard.

Construction is anticipated to start in winter 2014 and would be completed in winter 2019. The implementation dates for each individual segment is unknown at this time. Timing is dependent upon the final construction bid packet and contractor timing. Adjacent business owners and residents will be notified in advance by LADWP prior to work commencing at the respective work areas.

E-2 The commenter asks if the intersections will be closed completely.

Although temporary modifications may occur to some through and turn lanes, all intersections will remain open to allow traffic to flow through during project construction activities. Pipe-jacking would occur at five intersections in order to avoid modifications to intersection geometry.

May 5, 2014

Ms. Irene Paul
Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Dear Ms. Paul:

**DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
FOOTHILL TRUNK LINE UNIT 3
CITY OF LOS ANGELES**

Thank you for the opportunity to review the DEIR for the Foothill Trunk Line Unit 3 project. The project would replace and upsize approximately 16,600 linear feet of the existing Foothill Trunk Line from northwest of Hubbard Street, where it would connect to the 60-inch pre-stressed concrete cylinder pipe, to the southeast of Terra Bella Street, where it would connect to a 36-inch pipe along Foothill Boulevard and a 30-inch pipe on Terra Bella Street. The project area is located in the City of Los Angeles in the communities of Sylmar and Pacoima.

The following comments are for your consideration as they relate to the Foothill Trunk Line Unit 3 project:

Water Resources

1. It should be noted that if an encroachment, connection, alteration, or access to a Los Angeles County Flood Control District (LACFCD) facility is required, applicable permits must be applied for with our Land Development Division Permits/Subdivision Section. 1

2. Public Works, Flood Maintenance Division, West Area, maintains Pacoima Wash and Storm Drain BL 572. Existing facilities and appurtenant structures shall be protected in place during construction. Any damages to flood control infrastructure must be repaired by the project proponent to the satisfaction of the LACFCD. 2

3. Subsequent plans should clearly label and identify all affected LACFCD infrastructure.

3

4. Appropriate Best Management Practices must be implemented during construction to reduce/eliminate construction debris from entering flood control facilities. A BMP plan should be included in the construction plans.

4

5. Ingress/egress access by LACFCD maintenance vehicles along LACFCD's easement shall be preserved after construction of the subject project.

5

In addition, we request the opportunity to review all future documents and drawings associated with the Foothill Trunk Line Unit 3 project.

If you have any questions regarding the water resource comments, please contact Vanessa Hernandez of Flood Maintenance Division at (818) 896-0594 or vhernandez@dpw.lacounty.gov.

If you have any other questions or require additional information, please contact Matthew Dubiel at (626) 458-4921 or mdubiel@dpw.lacounty.gov.

MD:

P:\dpub\SUBPCHECK\Plan Checking Files\Zoning Permits\Projects submitted by Other Agencies\Foothill Trunk Line Unit 3 - City of LA\2014-03-27 DEIR\2014-05-05, Foothill Trunk Line Unit 3 DEIR - LACDPW Comments.doc

Response to Letter F

F-1 The commenter states that it should be noted that if an encroachment, connection, alteration, or access to a Los Angeles County Flood Control District (LACFCD) facility is required, applicable permits must be applied for with the Land Development Division Permits/Subdivision Section.

The commenter is referred to Mitigation Measure Hydro -3, which provides that prior to the initiation of any construction activities, LADWP shall coordinate with the LACFCD to ensure the portions of the proposed project located within the 100-year flood plan would conform to LACFCD structural development requirements.

The commenter is also referred to Section 3.0 Revisions to EIR, which provides the following additions to Mitigation Measure HYDRO-3 at page 3.8-2, which includes:

... “would obtain all applicable permits and would conform to LACFCD structural development requirements.”

Additionally, at Section 3.0 Revisions to the EIR shows revisions to page 2-13, Table 2-1, Discretionary Permits Potentially Required the following addition is made above the last row:

County of Los Angeles Flood Control District, Land Development Division Permits/Subdivision Section

Permit to develop a utility line over the Pacoima Wash; Encroachment Permit

Construction over the Pacoima Wash; Encroachment Permit within their easement

F-2 The commenter states that is should be noted that if an encroachment, connection, alteration, or access to a LACFCD facility is required, applicable permits must be applied for with our Land Development Division Permits/Subdivision Section.

The commenter is referred to the modifications provided in Response F-1 above.

F-3 The commenter states that subsequent plans should clearly label and identify all affected LACFCD infrastructure.

The comment is noted. The comment is included in the administrative record and provided to City decision-makers for their consideration in conjunction with their deliberations regarding the Final EIR and the proposed project.



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

May 6, 2014

Irene Paul
Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Subject: Foothill Trunk Line Unit 3
SCH#: 2013011019

Dear Irene Paul:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on May 5, 2014, and no state agencies submitted comments by that date. 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 call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Document Details Report
State Clearinghouse Data Base **Comment Letter G**

SCH# 2013011019
Project Title Foothill Trunk Line Unit 3
Lead Agency Los Angeles Department of Water and Power

Type EIR Draft EIR

Description LADWP proposes to install a 54-inch welded steel pipe as part of the proposed Foothill Trunk Line Unit 3 Project (proposed project). The proposed project would replace and upsize approximately 16,600 linear feet of the existing FTL from northwest of Hubbard Street, where it would connect to the 60-inch PCCP, to just southeast of Terra Bella Street, where it would connect to a 36-inch pipe along Foothill Boulevard and a 30-inch pipe on Terra Bella Street. Furthermore, the proposed project would minimize dependency on the Sheldon Pump Station and would allow the LADWP to decommission several pipelines, which have a history of leaks, currently servicing the area. The proposed project would be located in the City of Los Angeles in the communities of Sylmar and Pacoima.

Lead Agency Contact

Name Irene Paul
Agency Los Angeles Department of Water and Power
Phone 213 367 3509
email
Address 111 North Hope Street, Room 1044
City Los Angeles **State** CA **Zip** 90012
Fax

Project Location

County Los Angeles
City
Region
Lat / Long 34° 10' 56.3" N / 118° 14' 40.2" W
Cross Streets 600-foot north of the intersection of Hubbard Street and Foothill Blvd. to Terra Bella Street
Parcel No. Public Utility Easement
Township **Range** **Section** **Base**

Proximity to:

Highways Hwy 210
Airports Whiteman Airport
Railways N/A
Waterways Pacoima Wash
Schools Gridley Elem, Valley Region, Hillary T. Broadous
Land Use Zoning/General Plan

Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Schools/Universities; Septic System; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; CA Department of Public Health; Air Resources Board; State Water Resources Control Board, Division of Financial Assistance; Regional Water Quality Control Board, Region 4; Native American Heritage Commission

Date Received 03/20/2014 **Start of Review** 03/20/2014 **End of Review** 05/05/2014

Response to Letter G

G-1 The commenter states The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on May 5, 2014, and no state agencies submitted comments by that date. The commenter acknowledges the project has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

The comment is noted. The comment is included in the administrative record and provided to City decision-makers for their consideration in conjunction with their deliberations regarding the Final EIR and the proposed project.

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

April 30, 2014

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2714 MEDIA CENTER DRIVE
LOS ANGELES, CA 90065
FAX: (323) 342-6210 OR
(323) 342-6211

File: SC.CE.

Ms. Irene Paul
Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Dear Ms. Irene Paul,

Foothill Trunk Line Unit 3 Project – Notice of Availability of the Draft EIR

This is in response to your March 21, 2014 letter requesting wastewater service information for your proposed trunk line project located throughout Sunland-Tujunga-Lakeview Terrace-Shadow Hills-East La Tuna Canyon Area. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) has reviewed the request and found the project to be related to the construction of water pipes only.

Based on the project description, we have determined the project is unrelated to sewers and therefore do not have sufficient detail to offer an analysis at this time. Should the project description change, please continue to send us information so that we may determine if a sewer assessment is required in the future.

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "Development Best Management Practices Handbook – Part B: Planning Activities". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at:



www.lastormwater.org. It is advised that input regarding SUSMP requirements be received in the early phases of the project from WPD's plan-checking staff.

↑
1

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the SUSMP/LID requirements.

↑
2

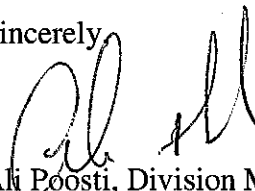
CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

↑
3

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Fl, Station 18.

Sincerely,



Ali Poosti, Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation

KB\AP:tn

- c: Kosta Kaporis, SAN
- Daniel Hackney, SAN
- Zemamu Gebrewold, SAN

Response to Letter H

H-1 The commenter states that the project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in “Development Best Management Practices Handbook - Part B: Planning Activities.”

The commenter is referred to Mitigation Measures HYDRO-1 and HYDRO-2, which require the LADWP to prepare a SWPPP and contract specifications that would ensure impacts to water quality from construction activities would be less than significant. These mitigation measures outline some specific Best Management Practices LADWP will utilize which will ensure impacts to water quality are minimized from project implementation.

H-2 The commenter states that the City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns.

The comment is noted. The comment is included in the administrative record and provided to City decision-makers for their consideration in conjunction with their deliberations regarding the Final EIR and the proposed project.

H-3 The commenter states that the project is required to implement stormwater control measures during its construction phase. The commenter provides that all projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

The commenter is referred to response H-1 above, which describes the proposed projects requirements to prepare a SWPPP and other measures to ensure the project will not impact water quality in the project vicinity.

CHAPTER 3

Revisions to the Draft EIR

This section contains revisions to the Draft EIR based upon: (1) clarifications required to prepare a response to a specific comment; and/or (2) typographical errors. The provision of these additional mitigation measures does not alter any impact significance conclusions as disclosed in the Draft EIR. Changes made to the Draft EIR are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions.

3.1 Draft Revisions in Response to Written Comments

The following text has been revised in response to comments received on the Draft EIR.

The following additions to Mitigation Measure HYDRO-3 at page 3.8-2 includes:

... “ would obtain all applicable permits and would conform to LACFCD structural development requirements.”

Additionally, revisions to page 2-13, Table 2-1, Discretionary Permits Potentially Required the following addition is made above the last row :

County of Los Angeles Flood
Control District , Land
Development Division
Permits/Subdivision Section

Permit to develop a utility line
over the Pacoima Wash;
Encroachment Permit

Construction over the Pacoima
Wash; Encroachment Permit
within their easement

The following addition is made to Mitigation Measure Cul-3 on page 3.4-23:

CUL-3: A qualified paleontologist shall also conduct pre-construction worker environmental awareness training prior to construction activities. This training shall include information on what to do in case an unanticipated discovery is made by a worker. All construction personnel shall be informed of the possibility of encountering fossils, and instructed to immediately inform the construction foreman if any bones or other potential fossils are unexpectedly unearthed in an area where paleontological monitoring is not required. LADWP shall ensure that construction personnel are made available for and attend the training and shall retain documentation demonstrating attendance. This training may be conducted in coordination with training required under Mitigation Measure CUL-1.

In the event fossils are exposed during earth moving, ~~the monitor~~ construction crew, in coordination with LADWP, shall halt or redirect construction activities to other work areas so the find can be evaluated by a qualified paleontologist. At each fossil locality, field data

forms shall be used to record pertinent geologic data, stratigraphic sections shall be measured, and appropriate sediment samples shall be collected and submitted for analysis. Any fossils encountered and recovered shall be catalogued and donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository.

CHAPTER 4

Mitigation Monitoring and Reporting Program

Pursuant to Section 21081.6 of the Public Resources Code and the *CEQA Guidelines* Section 15097, a lead agency is required to adopt a monitoring and reporting program for assessing and ensuring compliance with the required mitigation measures applied to a proposed project for which an EIR has been prepared. As stated in the Public Resources Code (Section 21081.6(a)):

“...the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.”

Section 21081.6 provides general guidelines for implementing mitigation monitoring programs and indicates that specific reporting and/or monitoring requirements, to be enforced during project implementation, shall be defined prior to final certification of the EIR. The lead agency may delegate reporting or monitoring responsibilities to another public agency or a private entity, which accept such delegation. The lead agency, however, remains responsible for ensuring that implementation of the mitigation measures occur in accordance with the program.

The mitigation monitoring table below lists mitigation measures and project design features that are required to reduce the significant effects of the proposed project. These measures correspond to those outlined in Chapter 1, and discussed in Sections 3.1 through 3.12 of the Draft EIR, and those revised in this Final EIR (see Chapter 4). To ensure that the mitigation measures are properly implemented, a monitoring program has been devised which identifies the timing and responsible entity for monitoring each measure. LDAWP will have the responsibility for implementing the measures, and various public agencies will have the primary responsibility for enforcing, monitoring, and reporting the implementation of the mitigation measures.

**TABLE 4.1
MITIGATION MONITORING AND REPORTING PROGRAM**

MM	Mitigation Measure	Method of Verification	Timing of Implementation	Responsibility
Cultural Resources				
MM CUL-1	Prior to earth moving activities, a qualified archaeologist meeting the Secretary of the Interior's qualifications standards for archaeology shall conduct cultural resources sensitivity training for all construction personnel. Construction personnel shall be informed of the types of cultural resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources. The applicant shall ensure that construction personnel are made available for and attend the training and shall retain documentation demonstrating attendance.	LADWP, cultural resource sensitivity training report	Prior to the issuance of any grading or excavation permits.	LADWP and project contractor
MM CUL-2	<p>In the event of the discovery of historical or archaeological materials, the contractor shall immediately cease all work activities in the area (within approximately 100 feet) of the discovery until it can be evaluated by the qualified archaeologist. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone or concrete footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. After cessation of excavation, the contractor shall immediately contact LADWP. The contractor shall not resume work until authorization by LADWP is received.</p> <p>LADWP shall retain the services of a qualified professional archaeologist, meeting the Secretary of the Interior's Standards for a Qualified Archaeologist, to evaluate the significance of the materials and recommend appropriate treatment measures prior to resuming any construction-related activities in the vicinity of the find. If the qualified archaeologist determines that the discovery constitutes a significant resource under CEQA, preservation in place is the preferred manner of mitigation. In the event preservation in place is demonstrated to be infeasible, a detailed Cultural Resources Treatment Plan shall be prepared and implemented by a qualified archaeologist in consultation with the City. LADWP shall consult with appropriate Native American representatives in determining appropriate treatment for unearthed cultural resources if the resources are prehistoric or Native American in nature. Archaeological materials recovered during any investigation shall be curated at an accredited curatorial facility. The report(s) documenting the implementation of the Cultural Resources Treatment Plan shall be submitted to LADWP and to the South Central Coastal Information Center.</p>	LADWP, site inspection	In the event of a discovery	LADWP and project contractor
MM CUL-3	A qualified paleontologist shall also conduct pre-construction worker environmental awareness training prior to construction activities. This training shall include information on what to do in case an unanticipated discovery is made by a worker. All construction personnel shall be informed of the possibility of encountering fossils, and instructed to immediately inform the construction foreman if any bones or other potential fossils are unexpectedly unearthed in an area where paleontological monitoring is not required. LADWP shall ensure that construction personnel are made available for and attend the training and shall retain documentation demonstrating	Monitor, LADWP, Contractor	In the event of a discovery	LADWP, project contractor, and monitor

**TABLE 4.1
MITIGATION MONITORING AND REPORTING PROGRAM**

MM	Mitigation Measure	Method of Verification	Timing of Implementation	Responsibility
	<p>attendance. This training may be conducted in coordination with training required under Mitigation Measure CUL-1.</p> <p>In the event fossils are exposed during earth moving, the construction crew, in coordination with LADWP, shall halt or redirect construction activities to other work areas so the find can be evaluated by a qualified paleontologist. At each fossil locality, field data forms shall be used to record pertinent geologic data, stratigraphic sections shall be measured, and appropriate sediment samples shall be collected and submitted for analysis. Any fossils encountered and recovered shall be catalogued and donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository.</p>			
MM CUL-4	<p>If human remains are uncovered during project construction, LADWP shall immediately halt work, contact the Los Angeles County Coroner to evaluate the remains, and follow the procedures and protocols set forth in Section 15064.5 (e)(1) of the CEQA Guidelines. If the County Coroner determines that the remains are Native American, the Native American Heritage Commission (NAHC) will be notified, in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code 5097.98 (as amended by AB 2641). The NAHC shall designate a Most Likely Descendent (MLD) for the remains per Public Resources Code 5097.98, and the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section (PRC 5097.98), with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.</p>	LADWP, project contractor, and monitor	In the event of a discovery	LADWP, project contractor, and monitor
Geology and Soils				
GEO-1	<p>Prior to the approval of construction plans for the project, LADWP shall complete a design-level geotechnical investigation. The geotechnical evaluation shall identify soil properties needed for the development of site-specific design criteria. Recommendations made as a result of these investigations to protect new structures from seismic hazards shall become incorporated into the proposed project.</p>	Plan Check	Prior to the issuance of any grading permit.	LADWP
GEO-2	<p>LADWP shall comply with all the National Pollutant Discharge Elimination System (NPDES) permitting requirements for the City of Los Angeles. Requirements may include but are not limited to Best Management Practices (BMPs) such as soil erosion control measures.</p>	Site inspection	Prior to the issuance of any grading permit, periodically throughout life of project	LADWP
Hazards and Hazardous Materials				
HAZ-1	<p>If potentially contaminated soils (odorous, stained) are discovered during ground disturbing activities, construction shall stop until the soils are properly evaluated for contamination and if necessary removed and disposed of in accordance with local, state, and federal regulations.</p>	Site Inspection	Prior to the issuance of any grading permit.	LADWP, project contractor

**TABLE 4.1
MITIGATION MONITORING AND REPORTING PROGRAM**

MM	Mitigation Measure	Method of Verification	Timing of Implementation	Responsibility
HAZ-2	<p>The construction crew shall be required to implement BMPs for handling hazardous materials during the project. The use of construction BMPs shall minimize negative effects on groundwater and soils, and will include, without limitation, the following:</p> <ul style="list-style-type: none"> • Follow manufacturers' recommendations and regulatory requirements for use, storage, and disposal of chemical products and hazardous materials used in construction; • Avoid overtopping construction equipment fuel tanks; • During routine maintenance of construction equipment, properly contain and remove grease and oils; and • Properly dispose of discarded containers of fuels and other chemicals. 	Plan check, site inspection	Duration of project construction	LADWP
Hydrology and Water Quality				
HYDRO-1	<p>LADWP shall prepare a Stormwater Pollution Prevention Plan (SWPPP) for the construction activities associated with the proposed project. The SWPPP shall be maintained at the construction site for the entire duration of construction. The objectives of the SWPPP are to identify pollutant sources that may affect the quality of storm water discharge and implement BMPs to reduce pollutants in storm water discharges during construction and post construction. The SWPPP shall include the following:</p> <ul style="list-style-type: none"> • Source identification; • Site map; • Description of construction materials, practices, and equipment storage and maintenance; • List of pollutants with potential to contact storm water; • Estimate of the construction site area and percent impervious area; • Erosion and sedimentation control practices, including soils stabilization, revegetation, and runoff control to limit increases in sediment in storm water runoff, such as detention basins, fiber rolls, silt fences, check dams, geofabrics, drainage swales, and sandbag dikes; • Using structural controls such as gravel bags or fiber roles retain sediment to avoid draining toward receiving waters; • Proposed construction dewatering plans; • List of provisions to eliminate or reduce discharge of materials to storm water; • Description of waste management practices; 	Plan check	Prior to the issuance of any grading permits	LADWP, RWQCB

**TABLE 4.1
MITIGATION MONITORING AND REPORTING PROGRAM**

MM	Mitigation Measure	Method of Verification	Timing of Implementation	Responsibility
	<ul style="list-style-type: none"> • Spill prevention and control measures; • Maintenance and training practices; and • Sampling and analysis strategy and sampling schedule for discharges from construction activities. • Stabilize slopes of stockpiled sand/soil to eliminate or reduce sediment dispersal from construction site to surrounding areas and surface waters; • Store all reserve fuel supplies only within the confines of a designated construction staging area; • The use or storage of petroleum-powered equipment shall be accomplished in a manner to prevent the potential release of petroleum materials into receiving waters; • Refueling will occur only within designated fueling zones that are equipped with secondary containment and spill clean-up equipment. 			
HYDRO-2	<p>LADWP shall incorporate into contract specifications the requirements that:</p> <ul style="list-style-type: none"> • The construction staging areas shall be developed to contain surface runoff so that contaminants such as oil, grease, and fuel products do not drain towards receiving waters. • If heavy-duty construction equipment is stored overnight at the construction staging areas, drip pans or plastic lines with edges shall be placed beneath the machinery engine block and hydraulic systems to prevent any leakage from entering runoff or receiving waters. • Vehicle fueling shall be conducted in a manner to protect impacting the Pacoima Wash and all fueling activities shall include the uses of drip pans and spill kits. • Any spills shall be cleaned up immediately and disposed of off-site. • Spill kits capable of containing hazardous spills will be stored on-site. Required materials shall be specified in contractor specifications. 	Plan check	Prior to the issuance of any grading permits	LADWP , RWQCB
HYDRO-3	<p>Prior to the initiation of any construction activities, LADWP shall coordinate with the Los Angeles County Flood Control District (LACFCD) to ensure the portions of the proposed project located within the 100-year flood plan would obtain all applicable permits and conform to LACFCD structural development requirements.</p>	Plan check	Prior to the initiation of any construction activities	LADWP, LACFD

**TABLE 4.1
MITIGATION MONITORING AND REPORTING PROGRAM**

MM	Mitigation Measure	Method of Verification	Timing of Implementation	Responsibility
Noise				
NOISE-1	All construction equipment shall be properly maintained and equipped with mufflers and other suitable noise attenuation devices.	Site inspection		LADWP, project contractor
NOISE-2	The Los Angeles Department of Water and Power (LADWP) or the grading and construction contractors shall endeavor to use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment). Noisy equipment shall be used only when necessary and shall be switched off when not in use.	Site inspection	Duration of project construction	LADWP, project contractor
NOISE -3	To ensure vehicle staging areas are located away from noise-sensitive receptors, the LADWP or the construction contractor shall ensure that large construction equipment is stored at the off-site staging area, when feasible. Construction equipment that must remain on-site shall be stored within the construction work area.	Site inspection	Duration of project construction	LADWP, project contractor
NOISE-4	Prior to any construction activities, the public shall be notified of the location and dates of construction. Residents shall be kept informed of any changes to the construction schedule	Prior to any construction activities at the specific construction locations	Duration of project construction	LADWP
NOISE-5	A dedicated public liaison from the Los Angeles Department of Water and Power for the proposed project shall be identified who will be responsible for addressing public concerns about construction activities, including excessive noise. The public liaison shall determine the cause of the concern (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures to address the concern.	During construction activities at the specific construction locations	Duration of project construction	LADWP
NOISE-6	The LADWP and the construction contractor shall develop a Noise Mitigation Plan (which will include a construction schedule), to reduce construction noise, where feasible and to minimize sensitive receptor exposure to construction noise. The Noise Mitigation Plan shall identify areas near sensitive receptors where it is feasible to install temporary noise around noisy equipment. The temporary noise barrier shall be of sufficient height to obstruct the line-of-sight of the noise-sensitive receptor from the noise source shall be employed when staging sites are restricted to residential neighborhoods.	Plan check	Prior to and during project construction	LADWP, project contractor
NOISE-7	The LADWP construction supervisors shall receive training on project-specific noise requirements, noise issues for sensitive land uses adjacent to the proposed project alignment, and/or equipment operations.	Site inspection prior to any construction activities	Prior to any construction activities	LADWP
NOISE-8	Haul routes shall be restricted to major arterial roads and cannot be designated through residential areas. If not feasible, haul routes shall be reviewed and approved by the City of Los Angeles Department of Transportation in consultation with the Los Angeles Department of Water and Power before haul route can be on major arterial roads in residential areas.	Plan check, during construction activities	Prior to any construction activities	LADWP

**TABLE 4.1
MITIGATION MONITORING AND REPORTING PROGRAM**

MM	Mitigation Measure	Method of Verification	Timing of Implementation	Responsibility
Traffic				
TR-1	Prior to project construction, the Los Angeles Department of Water and Power shall prepare a project specific Traffic Control Plan for the project area for review and approval by the Los Angeles Department of Transportation. The Traffic Control Plan shall include, at a minimum, signage within the Foothill Boulevard corridor in advance of the start of construction, warning of potential delays once construction starts. The Traffic Control Plan shall include signage to alert motorists to temporary limited access points to adjacent properties; appropriate barricades for lane closures; construction speed limit signage through the construction zone; and parking restrictions during construction.	Plan check	Prior to any construction activities	LADWP, LADOT
TR-2	An alternative routing plan shall be developed, including identification of way finding signage locations, to encourage traffic diversions for through traffic to multiple parallel routes such as Glenoaks Boulevard and other corridors.	Plan check	Prior to any construction activities	LADWP, LADOT
TR-3	Traffic shall be controlled during construction by adhering to the guidelines contained in Standard Specifications for Public Works Construction used by many municipalities in California and the California Manual on Uniform Traffic Control Devices, Part 6, "Temporary Traffic Control" and applicable City requirements. These guidelines provide methods to minimize construction effects on traffic flow.	Site inspection	During project construction	LADWP, LADOT
TR-4	At the unsignalized Home Depot Center Secondary Driveway (study intersection #4), temporary traffic signal shall be installed and operational during periods when the construction work zone is established across the signalized main Center access driveway (study intersection #3). Although full access will be provided at the main driveway intersection during construction, lane capacity will be reduced.	Site inspection	During project construction	LADWP, LADOT