Silver Lake Reservoir Complex Storage Replacement Project Final Environmental Impact Report

SCH #2003081133

Prepared for

City of Los Angeles
Department of Water and Power

April 2006

Prepared by

CH2MHILL
3 Hutton Centre Drive, Suite 200
Santa Ana, California 92707

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Appendixes

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1.0 Introduction

On August 4, 2005, the City of Los Angeles Department of Water and Power (LADWP) distributed to public agencies and the general public a Draft Environmental Impact Report (EIR) for the Silver Lake Reservoir Complex (SLRC) Storage Replacement Project (SRP). The SLRC SRP would remove Silver Lake and Ivanhoe Reservoirs from direct service to the LADWP water distribution system. Water storage currently provided by the SLRC would be replaced by a 110-million-gallon buried storage reservoir at the former Headworks Spreading Grounds (HWSG site). The new storage reservoir would be accompanied by water conveyance facilities and a 4-megawatt hydroelectric power generating facility to capture energy from the water pressure coming into the reservoir. A regulating station at the SLRC and a new bypass pipeline around the reservoir complex would convey water delivery flow to existing service areas. Silver Lake and Ivanhoe Reservoirs would cease to be operated as drinking water storage facilities.

In accordance with the California Environmental Quality Act (CEQA) Guidelines, a 45-day public review period of the Draft EIR was completed on September 19, 2005. During this review period, comments from both individuals and public agencies evaluating the Draft EIR were submitted to the Lead Agency, the LADWP.

Section 2.0 includes a copy of all comment letters submitted to the Lead Agency during the public comment period, and contains responses to significant environmental issues raised, in accordance with CEQA Guidelines Sections 15088(b) and 15132. Comments received that were informational in context and did not require specific responses are also included in Section 2.0.

A number of comments received during the public comment period addressed similar issues. In order to comprehensively respond to these comments, a series of Master Responses has been prepared. Section 3.0 includes Master Responses that address the following issues or project elements: regulating station, segmentation, cumulative impacts, alternatives, and SLRC construction schedule.

Minor project description changes and comments received during the comment period have resulted in revisions and clarifications to several Draft EIR chapters. These clarifications and revisions, presented in Section 4.0 of this document, do not alter the findings of the Draft EIR. Text revisions are indicated by strikeouts where text has been removed and italics where text has been added. All revisions to the Draft EIR are compiled in Section 4.0.

Appendix A includes a Mitigation and Monitoring Plan, which is a comprehensive compilation of the mitigation measures identified in the Draft and Final EIR for the SLRC SRP, accompanied by the appropriate monitoring action, responsible agency, mitigation timing, and monitoring agency.

Appendix B includes a comment letter from the City of Los Angeles Department of Public Works that was received outside of the public comment period. It has not been included in Section 2.0, but has been responded to and is included here for completeness.

2.0 Comments and Responses to Comments Received on the Draft EIR

Provided on the following pages are comments received on the Draft EIR for the Silver Lake Reservoir Complex Storage Replacement Project during the public comment period and responses to those comments. Comments were received from the following public agencies, persons, and organizations:

- Silver Lake Residents Association
- Latham and Watkins on behalf of Forest Lawn Memorial-Park Association
- State of California, Governor's Office of Planning and Research
- State of California Division of Safety of Dams
- City of Burbank, Community Development Department
- Committee to Save Silver Lake's Reservoirs

Two comment letters were received following the close of the public comment period. However, because the letters were received not long after the close of the public comment period, they have been included in this section. These letters were received from:

- County of Los Angeles, Department of Public Works
- Mount Sinai Memorial Park

Copies of the original comment letters are presented on the left side of the following pages, with individual comments numerically identified. Responses to individual comments are provided to the right of each letter. In some cases, the response directs the reader to a Master Response, which is included in Section 3.0 of this Final EIR. In other cases, the response to a comment required a minor change or clarification to the text of the Draft EIR; these changes or clarifications are included in Section 4.0 of this Final EIR.

Comment Letter #1

SL
RA
SILVER LAKE RESIDENTS ASSOCIATION
Post Office Box 39587, Griffith Station, Los Angeles, CA 90039
SLRA Hotline: 323-668-2643, FAX: 323-665-2125
www.silverlake.org

September 14, 2005

TO: Mr. Robert Prendergast, LADWP
Re: Silver Lake Reservoir Complex Storage Replacement Project (SLRCSRP) DEIR

The Silver Lake Residents Association participated in the review of the above DEIR with the Committee to Save Silver Lake's Reservoirs (CSSLR). We agree with the comments that you have received from them.

Additionally, we have great concerns about the following:

1. Taking both Ivanhoe and Silver Lake reservoirs **out of service and removing LADWP's operating facilities** from the site will have a substantial impact on the neighborhood. The promise of the LADWP to establish a long term maintenance and management plan in conjunction with community participation is inadequate. The *"devil is in the details"* and the community currently has no confidence in a vague promise made in a DEIR, based on previous experiences with the LADWP at Silverlake/Ivanhoe Reservoirs. A formal negotiation and mutually agreed to process must be established now between the LADWP, members of the Coalition to Preserve Open Reservoirs (CPOR) and others in the affected community to move this forward. 1-1

2. We were told that the **mitigation monitoring plan** is written after the Draft EIR and is included in the Final EIR. Our experience with these "after the fact" documents is mixed. The location of these Silver Lake projects can be less than 100' from residences in at least 4 or 5 locations. Care must be taken to address each of these sites with adequate construction mitigation and a method of reporting and solving problems quickly which is realistic. Most of the construction mitigation that was in the DEIR was "boiler plate" and does not adequately describe the needed level of custom-designed mitigation. Further, the mitigation that is on-going after the completion of the projects must have adequate detail with prescribed methods of reporting and solving problems that are realistic. 1-2

As part of the on-going Mediation Process with the Coalition to Preserve Open Reservoirs (CPOR), Memorandum of Understanding have been prepared and agreed to by both the LADWP and the other affected reservoir communities as represented by members of the CPOR. These documents have not even been drafted for the Silver Lake community. Specific time lines and goals need to be outlined in the EIR.

Responses to Letter #1

Response to Comment 1-1:

LADWP recognizes that the Proposed Project may potentially result in significant impacts to both the Silver Lake community and the area surrounding the HWSG site. Preparation of a Draft and Final EIR is the mechanism for identifying potential impacts and mitigation intended to reduce or eliminate those impacts. LADWP is required by the California Environmental Quality Act (CEQA) to have prepared a Mitigation Monitoring Plan (MMP) at the time the LADWP Board of Commissioners certifies the Final EIR and approves the Proposed Project. LADWP is required to follow through on its commitment to implement mitigation that will reduce or eliminate potential impacts.

Response to Comment 1-2:

As stated above, LADWP is required to prepare a Mitigation Monitoring Plan (MMP) that is a commitment to complete required mitigation. The mitigation measures included in the MMP are those identified in the Draft and Final EIR. The MMP is included with this Final EIR; see Appendix A. A Memorandum of Understanding (MOU) with the Silver Lake community is outside of the scope of the EIR for the Proposed Project.

Comment Letter #1

3. The building of the **pressure regulating station** on and under the grassy slope will remove a considerable amount of play space from the only grassy area in the SL Recreation Center property that is not dedicated to sports or dogs. While the sq ft of removed grass might be small, in effect it takes a large portion of the grassy slope out of use as grass. The design plans in the DEIR are inadequate and not clear in order to determine the design and how it might be minimized to consolidate access covers, move or minimize their size. There are mature trees in the area where the regulating station is to be located, yet there is inadequate mention of the tree removal and mitigation plan. There is insufficient information provided in the DEIR to reasonably assess impacts or to properly develop mitigation. 1-3

4. **Segmentation.** A few months ago, we were surprised to learn of the DEIR of a major project that is absolutely connected to the SLRCSRP. This was the Lower Reach River Supply Conduit (LRRSC). Yet, neither that DEIR nor this DEIR adequately tied them together in their impacts. These projects go hand in hand; horse and carriage. While the LRRSC is a needed upgrade to the system, the configuration of it is determined by the SLRCSRP. Had the SL water storage been located on the reservoir property (as was originally planned), the configuration of the LR RSC would have been quite different. Consequently, the failure of the LA DWP to adequately link them and their impacts may be classified as segmentation. 1-4

5. The SLRC is a City of Los Angeles **Cultural Historic Monument (#422)** which includes the spillway from Ivanhoe into Silver Lake. There is inadequate description of how these two reservoirs will work after the projects are completed and the reservoir complex abandoned as an operating, delivery and storage facility. This issue must be addressed in the long term maintenance and management plan. 1-5

6. The **quality, quantity and condition of the water** after these reservoirs are taken off line are not adequately addressed. Specific guidelines for this issue need to be included in the long term maintenance and managed plan. A limnologist must be hired to monitor the quality of the water and advise on what measures are to be taken to maintain the water in a healthy state. 1-6

7. **Cumulative Impacts** of Projects on Traffic and Air Quality. The SLRA knows of at least 15 public works projects (attached) that will be on going from October 2005 until the end of 2015. The DEIR (16.1.3.2) includes just 4. The LADWP was given the list of projects that we knew about and yet failed to revise the DEIR to include even those under their jurisdiction. Some of these projects are concurrent, some are overlapping, some are sequential. The DEIR does not adequately address the massive cumulative impacts of all of these projects on the already existing grid-locked traffic. The various projects call for some streets to be closed completely and other partially closed for months at a time. Adequate commitment and coordination to alleviate this predicted traffic and air quality problem is missing. 1-7

Responses to Letter #1

Response to Comment 1-3:

Potential impacts resulting from construction and operation of the regulating station were described throughout the Draft EIR. However, additional detail has been prepared to help describe the regulating station. Please see Master Response A in Section 3.0 of this Final EIR for additional information.

Response to Comment 1-4:

Please see Master Response B in Section 3.0 of this Final EIR.

Response to Comment 1-5:

Operation of the Proposed Project is described in Chapter 2, Project Description, of the Draft EIR, and throughout the resource area chapters of the Draft EIR. Additional information is provided throughout this Final EIR. Detail regarding the Property Maintenance and Management Plan is outside the scope of this EIR.

Response to Comment 1-6:

The appearance of the SLRC, including the water and the surrounding grounds and structures, is addressed in the adaptive management plan and the Property Maintenance and Management Plan (PMMP) as described in the Draft EIR. For the adaptive management plan, potential management tools will be evaluated while and after the reservoirs achieve a more natural condition. As described in the Draft EIR, the plan includes semiannual monitoring for nutrients (nitrogen and phosphorus); bimonthly water quality surveys (algal count, chlorophyll, transparency); turning on the mixer as needed; and in-reservoir alum treatment in the unexpected event that algae reaches excessive levels. LADWP will use the services of Water Treatment Operators and Water Biologists to monitor the conditions of the reservoirs; a limnologist will be used as necessary.

Comment Letter #1

The LADWP fails to even include all the projects that are under their jurisdiction. The Lower Reach River Supply Conduit (as described above) project is mentioned, but the impacts stated only relate to the Headworks area. Unit 4 -- The Silver Lake portion of the LRRSC -- (which is briefly discussed in the LRRSC DEIR released months ahead of this DEIR) is not addressed at all. This project ends at the north end of Ivanhoe Reservoir and will require prolonged street work in the Silver Lake area. Some of that project will be underway concurrently with this project. Yet, the cumulative impacts on the community are not addressed, nor is there other than boiler plate construction mitigation proposed. Some projects are capital improvements and some are routine maintenance. The routine maintenance projects may not require EIR's, but they are currently scheduled to be done in conjunction with the larger EIR-required projects and will have impacts not adequately addressed in this DEIR. While this may not actually be "segmentation" in the strictest definition of CEQA, it certainly violates the spirit of the intention of CEQA to not separate projects in order to make the whole project seem less consequential. 1-7

We are very disappointed that the LADWP has not been more forthcoming about the impact to the community of both the Silver Lake Storage Replacement Project and Lower Reach River Supply conduit projects.

Sincerely,

Maryann Kuk, President
Silver Lake Residents Association
323 665 4145

Cc: Councilmember Tom La Bonge, CD4
Councilmember Eric Garcetti, CD13
Committee to Save Silver Lake's Reservoirs
Alana Knaster

Responses to Letter #1

Response to Comment 1-7:

The cumulative impacts of anticipated projects in the project vicinity during the same timeframe as the Proposed Project are described in Chapter 16 of the Draft EIR. For additional detail on how the cumulative impacts analysis was prepared, and for additional analysis of projects where new information has become available, please see Master Response C in Section 3.0 of this Final EIR.

Comment Letter #2

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File No. 021662-0011

September 15, 2005

BY HAND DELIVERY AND FACSIMILE

Mr. Robert Prendergast
Los Angeles Department of Water and Power
111 North Hope Street, Room 1348
Los Angeles, CA 90012

Re: Silver Lake Reservoir Complex Storage Replacement Project Draft Environmental Impact Report

Dear Mr. Prendergast:

On behalf of our client, Forest Lawn Memorial-Park Association ("Forest Lawn"), we have reviewed the Draft Environmental Impact Report ("Draft EIR") for the Silver Lake Reservoir Complex Storage Replacement Project ("SLRCSR Project"). Forest Lawn has an understandable interest in this Project, as it is located across the street from the Headworks Spreading Grounds, and also shares its main access road, Forest Lawn Drive, with the Headworks site. Forest Lawn has serious concerns with the analysis in the Draft EIR and several of the decisions made in respect to the Project. Forest Lawn has had ongoing discussions with the Los Angeles Department of Water and Power ("DWP") regarding this project and its potential impacts, yet this Draft EIR fails to address any of Forest Lawn's concerns. Forest Lawn works hard to ensure that its customers and visitors have a peaceful and dignified experience at the Hollywood Hills location, and Forest Lawn has grown concerned that this Draft EIR does not address many of the potential impacts that the proposed Project could have on Forest Lawn's service to the Los Angeles Area. For the reasons stated in this letter, Forest Lawn respectfully requests that either the Project as proposed be modified or mitigated and/or that a new legally adequate document be prepared and recirculated to correct the deficiencies in the Draft EIR.

A. The Draft EIR Does Not Address the Cumulative Impacts of Projects

Under the California Environmental Quality Act ("CEQA"), a Project cannot be split to avoid analysis of the total environmental impacts of a Project. Cal. Code Regs. tit. 14 § 15165. *See also id.* at § 15130 (requiring that an EIR discuss cumulative impacts of a Project). Instead, a lead agency must consider, at a minimum, the cumulative impacts of all Projects related to the Project for which the EIR is written or it must prepare one EIR for the overall Project. Here the Draft EIR fails to do either of these adequately. 2-1

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Responses to Letter #2

Response to Comment 2-1:

The Draft EIR for the SLRC SRP describes the "whole of the project", as required by CEQA. For additional discussion on how the Draft EIR addresses the entirety of the proposed improvements related to the Proposed Project at the HWSG site, please see Master Response B in Section 3.0 of this Final EIR.

"Continued on next page"

Comment Letter #2

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An EIR should account for reasonably foreseeable future phases, or reasonably foreseeable consequences resulting from the Project, and should include the environmental effects of future actions if they are a reasonably foreseeable consequence of the initial Project and the future action would likely change the scope or nature of the initial Project or its environmental effects. *See Laurel Heights Improvement Association of San Francisco, Inc. v. The Regents of the University of California*, 47 Cal. 3d 376, 396 (1988).

2-1 Cont.

Forest Lawn earlier voiced its concerns regarding the Draft EIR for the Lower Reach Supply Conduit Project and how it relates to the future Upper Reach Project, as well as the current SLRCSR Project. As indicated in the Draft EIR, the SLRCSR Project is intended to relocate reservoirs to improve water quality in accordance with state and federal guidelines. The current Draft EIR for the Lower Reach Project addresses issues at the Headworks Spreading Grounds, including the installation of a pressure regulator at the site; the SLRCSR Project would constitute additional major changes to the Headworks Spreading Grounds including the improvements yielded from the Upper and Lower Reach Projects.

The proposal and environmental review of the SLRCSR Project in addition to the currently proposed Lower Reach and Upper Reach Projects in separate environmental documents demonstrates that this Draft EIR does not cover all the prospective phases or projects of these improvements. These projects will act as part of a larger scheme to use the Headworks Spreading Grounds site as a comprehensive water storage and delivery waystation. Splitting a comprehensive project into phases, and then producing a Draft EIR on only one phase of the project, is not permissible under CEQA. *See City of Santee v. County of San Diego*, 214 Cal. App. 3d 1438, 1450-55 (4th Dist. 1989).

Forest Lawn is also concerned by the inclusion of the Headworks Area Ecosystem Restoration Project in the Cumulative Impacts section of the Draft EIR. This Project, which would be executed in conjunction with the U.S. Army Corps of Engineers, would restore environmental resources at the Headworks site. This project should not have been split from the existing environmental review, especially considering that the U.S. Army Corps of Engineers Website expressly notes that, "[a]fter the approval of the Reconnaissance Study, DWP requested to revise the project scope to remove the recharge element of the project. This request was a result of LADWP's decision to use a portion of the Headworks site for a water storage tank." http://www.spl.usace.army.mil/headworks/laheadworks.htm. Even the DWP's website dedicated to the SLRCSR Project, http://www.silverlakestoragereplacement.com, includes a link to "Headworks Area Ecosystem Restoration Project" on the site. The fact that the proposed SLRCSR Project is modifying another project with its own environmental review process, and that the two projects have such a close relationship, makes it even more clear that all of these projects should be considered in one comprehensive environmental review that weighs all the benefits and burdens of all of these proposed changes to the Headworks Spreading Grounds site.

Forest Lawn is especially concerned regarding this phasing issue and the failure to conduct one overall EIR because of its proximity to the Headworks Spreading Grounds. The Headworks Spreading Grounds is located across Forest Lawn Drive from Forest Lawn. These Projects—the SLRCSR Project, the Upper and Lower Reach Projects, and the Ecosystem Restoration Project—would include major changes to the Headworks Spreading Grounds site.

Responses to Letter #2

The Draft EIR also thoroughly describes the potential cumulative impacts of the Proposed Project in conjunction with other projects in the same vicinity during the same construction timeframe. Potential cumulative projects in the vicinity of the HWSG site are described on pages 16-3 and 16-4 of the Draft EIR and potential cumulative impacts at the HWSG site are analyzed on pages 16-6 through 16-8. Additional clarifying information about cumulative impacts can be found in Master Response C in Section 3.0 of this Final EIR.

Comment Letter #2

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Not only does the Lower Reach Project propose a pressure regulator for the Headworks Spreading Grounds site, but the Upper Reach Project would originate from the site, the Ecosystem Restoration Project would result in additional construction on the site, and the SLRCSR Project proposes building a 110 million gallon reservoir and power generator on the *exact same site*.[1] In total, these Projects have the potential to subject Forest Lawn to additional noise, construction, traffic, and visual blight for over six years while DWP builds an integrated water management facility at the Headworks Spreading Grounds site. 2-1 Cont.

Further, it likely that particular aspects of the SLRCSR Project, such as the placement of equipment or facilities for the reservoir and power generating facility, would crossover into future projects like the Lower Reach Project and the Project's placement of the regulator station on the Headworks Spreading Grounds site. This prospect is confirmed by the statement in the Draft EIR that notes that Lower Reach Project construction and SLRCSR Project construction will be overlapped to try to avoid additional construction impacts caused by both Projects. Draft EIR, p. 16-4.

It is clear that the SLRCSR Project, as well as the Upper and Lower Reach Projects and the Ecosystem Restoration Project, all focus on the Headworks Spreading Grounds site as the nerve center of their operations, and each Project will result in significant changes to the site. The cumulative impacts of all of these Projects will also severely impact Forest Lawn Hollywood Hills for a period of more than six years, and this state of constant construction leads to many of Forest Lawn's additional concerns regarding traffic, noise, and visual resources. As a result, Forest Lawn again requests that DWP conduct a full review of the comprehensive Project by evaluation of a complete EIR that addresses all of these issues.

B. Traffic and Transportation

The traffic and transportation impacts of the SLRCSR Project are not simply significant even after mitigation, they are unacceptable. At the height of the Project, the traffic study excerpted in the Draft EIR expect that the SLRCSR Project alone will add over 500 vehicle trips per day to the Headworks Spreading Grounds site. This means that the current level of service at the intersection of Forest Lawn Drive and Zoo Drive, LOS C to D, will be severely degraded by the additional vehicles that must access the Headworks Spreading Grounds site though the Forest Lawn Drive/Zoo Drive intersection, and is projected to fall to LOS D to F by 2013. Draft EIR Appendix F, Table 10. There are limited access points to Forest Lawn Drive, and a majority of the traffic accessing Forest Lawn Drive accesses the Drive via the 134 freeway and the Forest Lawn Drive/Zoo Drive intersection. The intersection operating at lower levels of service could also pose a safety risk to drivers on the 134 freeway, where backup traffic from Forest Lawn Drive has been known to continue on to the freeway. 2-2

[1] The conclusion that the SLRCSR Project is part of a larger water management plan is further supported by the fact that Forest Lawn has learned that the pressure regulator currently proposed for the Headworks Spreading Grounds site, as part of the Lower Reach Project, may not be needed if the SLRCSR Project, and its resulting facilities, is completed at the Headworks Spreading Grounds site.

Responses to Letter #2

Response to Comment 2-2:

Please see the response to comment 2-1 for additional information about the relationship between the Proposed Project and the Upper and Lower RSC Replacement Projects.

The Draft EIR for the SLRC SRP appropriately assesses potential impacts associated with the Proposed Project. The Draft EIR for the Lower Reach RSC Replacement Project appropriately assesses potential impacts associated with that project. Each respective EIR, consistent with CEQA Guidelines, assesses the potential cumulative impacts associated with the other project.

The Draft EIR for the SLRC SRP addresses potential cumulative traffic impacts at the HWSG site as a result of Proposed Project construction along with construction traffic related to the Lower Reach RSC Replacement Project. The analysis concluded that there may be an incremental increase in the significant adverse impact associated at the intersection of Forest Lawn Drive and Zoo Drive and that cumulative construction impacts to traffic and transportation would likely remain significant after mitigation. For additional information about cumulative impacts, see Master Response C in Section 3.0 of this Final EIR.

Comment Letter #2

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The duration and severity of the construction impacts on Forest Lawn could be seriously understated due to failure of the Draft EIR to adequately address the impacts from the Upper and Lower Reach Projects, as well. It is unclear how construction on the SLRCSR Project will overlap with the construction of the Upper and Lower Reach Projects, although the Draft EIR readily notes that both the SLRCSR and Lower Reach Projects will take place at the same time, purportedly to minimize impacts. At minimum, however, the Draft EIR must actually analyze the *actual* potential interaction among the Upper and Lower Reach Projects and the SLRCSR Project, and cannot simply declare that the Projects will minimize traffic impacts by overlap. 2-2 Cont.

The partial closure of Forest Lawn Drive should also be addressed. Not only will partial closure of Forest Lawn Drive create additional traffic impacts, it will also create additional safety hazards for a roadway that is used by drivers who seek to avoid the freeway by using Forest Lawn Drive as a bypass route, as well as visitors to Forest Lawn and Mount Sinai cemeteries and Griffith Park. The traffic impacts of closing one to two lanes of this roadway cannot be underestimated. 2-3

In addition, the only proposed traffic mitigation measure suggested specifically for the Forest Lawn Drive/Zoo Drive intersection is staggered shifts for construction workers, intended to produce a more even demand on the intersection. This mitigation measure, however, does little for Forest Lawn. Forest Lawn visitors come to the site at all times during the day as well, and funerals are usually held early to mid-day, followed by processions to the Forest Lawn location for interment. While Forest Lawn appreciates that construction will not occur during weekends, when Forest Lawn is most heavily visited, the Forest Lawn Drive/Zoo Drive intersection is still subject to severe traffic daily, and, as mentioned previously, already operates at LOS C to D. Because of the limited access to Forest Lawn Drive via the freeway and Griffith Park, this intersection is key to traffic flow, and mitigations to reduce impacts to a less-than-significant level must be implemented. 2-4

Forest Lawn also requests a mitigation measure be added to provide for a construction management plan to mitigate impacts related to funeral processions leading into the Forest Lawn site, to ensure that its visitors have reasonable access to the site during operating hours. Specifically, Forest Lawn requests the construction management plan include a meeting, prior to commencement of construction, to discuss construction plans and schedules, general traffic mitigation plans, and visual mitigation measures to reduce blight on Forest Lawn Drive; direct access to site management for the construction site to address immediate issues that may arise in and around Forest Lawn Drive; and 72 hour notice of major impairments to the roadway. 2-5

C. Noise

By all accounts, the Project will create a great deal of construction noise. The Draft EIR and Technical Appendix to the Draft EIR make it clear noise levels caused by construction at the site will exceed the 10 decibels ("dB") required for significance under the City of Los Angeles *Draft CEQA Thresholds Guide*. The charts included in the Appendix readily acknowledge noise 2-6

Responses to Letter #2

Response to Comment 2-3:

The partial closure of Forest Lawn Drive is addressed in Chapter 9, Traffic and Transportation, on page 9-59. Preparation of a Transportation Management Plan by LADOT for this approximately 1-month partial closure would ensure that traffic impacts would be less than significant.

Response to Comment 2-4:

A mitigation measure intended to help reduce adverse impacts to Forest Lawn Memorial Park has been added to Section 4.0 of this Final EIR. However, mitigations that would reduce impacts at the intersection of Forest Lawn Drive and Zoo Drive to a less-than-significant level have not been determined to be feasible by professional traffic engineers.

Response to Comment 2-5:

A measure intended to mitigate potential impacts related to funeral processions has been added to the Proposed Project. Please see Section 4.0 for new text.

Response to Comment 2-6:

As described in the noise chapter of the Draft EIR, construction noise levels at the HWSG site have been estimated conservatively high and it is anticipated that Mitigation Measure N-1 will be successful at reducing potential noise impacts to less-than-significant levels. The LADWP project manager would actively work with Forest Lawn Memorial Park to help ensure that noise impacts are less than significant. Forest Lawn Memorial Park would have the appropriate contact information for the LADWP project manager and would be able to report significant noise levels. If construction noise levels are determined to be significant, LADWP would implement bullet number 1 of Mitigation Measure N-1, which is the institution of a noise monitoring and mitigation program at the HWSG site that will account for perceived as well as actual measured noise levels.

Comment Letter #2

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at the site could measure up to 100 dB.[2] The current noise level at Forest Lawn, as measured by the DWP's consultant, is 62.7 Leq, although the DWP's consultant in the Draft EIR for the Lower Reach Project measured the noise level near Forest Lawn at 57.1 dB. As indicated in Table 10-3 on p. 10-10 of the Draft EIR, the sound range deemed generally acceptable for cemeteries is between 50 CNEL and 75 CNEL, with anything above 80 CNEL being deemed "Clearly Unacceptable." As the table notes, "Clearly Unacceptable" means that "new construction or development should not be undertaken."

2-6

This construction noise, even with the proposed mitigations, is simply too loud. Even with consideration given to the fact that the Project operation itself will produce less-severe noise impacts to Forest Lawn than the actual construction, Forest Lawn is a sensitive use that will be subject to the construction noise for **over six years**.[3] The mitigation measure proposed, Mitigation Measure N-1, is vague, suggesting several noise reduction techniques but noting that "[m]easures to minimize noise from construction activities at the HWSG site will include *some or all* of the following...." [emphasis added]. This offers Forest Lawn no guarantee that any specific measure will be used, only that some measures will be used, and makes no indication of what, if any, target noise level is desired, will be achieved, or can even be expected.

In addition, Section 10.4.1 on p. 10-28 makes it clear that, even after mitigation, there may be significant impacts regarding noise. Because a significant impact is defined as a 10 dB or more increase in sound under the Los Angeles City guidelines, *supra*, there is no guarantee the Project construction noise will remain under 72.7 dB or equivalent measure, which, according to Table 10-3, is "Normally Unacceptable" for a cemetery. Any noise level over 80 CNEL is "Clearly Unacceptable" for a cemetery.

2-7

Forest Lawn must be fully informed of the noise impacts this Project will have on the cemetery. A Project that is planned to be in construction for over six years must have a clearer and more adequate plan to project and manage construction noise impacts on a memorial park that serves the entire Los Angeles community.

D. Visual Resources

As mentioned in the Draft EIR, this Project is going to be constructed over a period in excess of six years. Yet the Draft EIR concludes that because the Headworks Spreading Grounds site is currently of a low level of visual quality, there will be no impacts caused by the construction site that will be located adjacent to the hills of Forest Lawn.

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[2] As noted in our previous letter regarding the Lower Reach Project, a jet flyover at 1,000 feet measures at 105 dB.

[3] It should be noted that the Draft EIR for the SLRCSR Project indicates that operational noise at the site, after construction, will be of little consequence because of noise levels already existing at Forest Lawn. Operations of the site are estimated to occur at a noise level that is lower than the existing noise level at Forest Lawn as indicated in this EIR, but higher than the existing noise level at Forest Lawn as indicated in the Draft EIR for the Lower Reach Project. This inconsistency must be corrected, and makes it even more clear that one Draft EIR should be distributed for all of the DWP's *Headworks Spreading Grounds site Projects*.

2-8

Responses to Letter #2

Response to Comment 2-7:

Please see the response to Comment 2-6.

Response to Comment 2-8:

There is an error in the LRRSC Draft EIR; the analysis included in the Draft EIR for the Proposed Project is correct.

Response to Comment 2-9:

The bulk of construction at the HWSG site would be located on the east side of the site, where the buried reservoir would be located, while Forest Lawn Memorial Park is located across from the western side of the site. Nevertheless, it is true that Forest Lawn Memorial Park is located on hills overlooking the flat HWSG site and due to this existing topography there would be unavoidable views of construction activities from Forest Lawn Memorial Park. Potential visual resources impacts associated with the HWSG site are fully disclosed in Chapter 14 of the Draft EIR.

Comment Letter #2

LATHAM•WATKINS LLP

While the Headworks Spreading Grounds site is not currently of high visual quality, it is in a natural state with dried grasses and wildlife. It is not currently a construction site with large machinery, workers, and trailers, and all of the business that occurs a construction site. The visual quality of this site during construction is disconcerting for two reasons. The first is that Forest Lawn is situated on hills, while the construction site is on a flat area north of Forest Lawn Drive. As a result, the entire construction site is visible from most points at Forest Lawn. The second is that visitors and those attending graveside services at Forest Lawn will have a full view of an operating construction site. While ordinary, day-to-day activities are unavoidable even if they must occur adjacent to a cemetery, and Forest Lawn appreciates that the Draft EIR indicates that the DWP will attempt to park construction equipment out of the view of visitors to Forest Lawn, the Draft EIR must acknowledge more fully the visual impacts of the Project and must propose mitigations to address those impacts. 2-9

The Draft EIR also mentions that the completed Project will include a substation next to the proposed hydroelectric plant, and indicates that the outdoor substation could be placed indoors, next to the hydroelectric plant, in a larger building. Forest Lawn requests that this option be evaluated and implemented to ensure that the final operations of the Project detract as little as possible from surrounding views. 2-10

E. Project Alternatives

The Project Alternatives listed in section 15.0 starting at p. 15-1 are severely lacking. Only two alternatives to the proposed Project are suggested, and one of them is the CEQA-mandated "no project" alternative. The other alternative is related to additional changes to the Silver Lake site. While these limited alternatives fail to establish that the currently proposed Project is, in fact, the most environmentally sound and least-impactful project, Forest Lawn is more concerned with the alternatives that were excluded before full exploration in the Draft EIR.

Upon reading the list of excluded alternatives in Section 15.2.5, it is apparent that only one project alternative—the proposed Project—includes use of the Headworks Spreading Grounds site. It is unclear why out of 14 alternatives, not including the "no project" alternative, only one includes the Headworks Spreading Grounds site. 2-11

This is especially troubling when taken in context of the other alternatives available. A majority of the alternatives mentioned in the Draft EIR are variations of significant impacts on Silver Lake, and while many of those alternatives may create historic impacts for Silver Lake, many of those alternatives are still environmentally feasible. Yet there is no additional set of alternatives that vary the possible impacts on the Headworks Spreading Grounds. Even if additional alternatives involving the Headworks Spreading Grounds site are eventually excluded because they fail to meet environmental standards, they must be considered. 2-12

In addition, the current project, as proposed, needs to be described in this section for ease of comparison with other projects. Directing the reader to review the entirety of Chapter Two of the Draft EIR for a quick overview of items like anticipated cost and construction duration makes it difficult, if not impossible, for the reader to compare the proposed project to project alternatives. In addition, the Draft EIR should include a description of the Silver Lake Master 2-13

Responses to Letter #2

Comment 2-9 (Cont.)

While no mitigation has been identified that would fully screen Forest Lawn Memorial Park from having views of the HWSG site during construction, an additional mitigation measure has been added to help address temporary visual impacts to funeral processional traffic during construction; see Section 4.0 for new text.

Response to Comment 2-10:

During detailed design of the hydroelectric power plant, LADWP will further evaluate whether the substation can be located indoors. The alternative to locate the substation indoors will be implemented if feasible.

Response to Comment 2-11:

The project alternatives described in Chapter 15 were developed after several years of working with the community and exploring various storage replacement options. LADWP did not focus on any particular site when developing alternatives, and Chapter 15 also discusses offsite water storage locations that were considered other than the HWSG site. Master Response D in Section 3.0 of this Final EIR provides additional information about the history of alternatives development and discusses other storage options at the HWSG site that were considered.

Response to Comment 2-12:

The Alternatives Chapter (Chapter 15) in the Draft EIR provides a description of regulatory and operational requirements that an alternative must meet along with a complete list of screening criteria for project alternatives. The alternatives evaluation concluded that there were only two alternatives that met the screening criteria: onsite storage with operational changes (storage at the SLRC) and offsite storage with operational changes (the Proposed Project). No other alternatives at the SLRC were considered to be environmentally feasible.

Please also see the response to Comment 2-11, as well as Master Response D in Section 3.0 of this Final EIR that address review of potential alternatives at the HWSG site.

Comment Letter #2

LATHAM & WATKINS LLP

Plan community values that were used in assessing the proposed alternatives, instead of the currently existing references, which fail to include any real description of the actual standards used for weighing the alternatives. 2-14

Consequently, the Draft EIR must evaluate additional alternatives that vary the impacts on the Headworks Spreading Grounds site and its surrounding neighbors. Silver Lake should not be the only site that is offered the privilege of varying degrees of impacts resulting in the majority of impacts being shifted to the San Fernando Valley and the neighbors of the Headworks Spreading Grounds site. In addition, the proposed project must be adequately described in the Project Alternatives Chapter of the Draft EIR to ensure that it can be easily compared to the other proposed alternatives. 2-15

F. Conclusion

In short, Forest Lawn has strong doubts regarding the adequacy of the Draft EIR for the SLRCSR Project. At minimum, Forest Lawn requests that the Draft EIR be revised and recirculated to assure compliance with all of the requirements of CEQA, but also requests that the DWP consider changing Project plans to comply with all applicable laws. In particular, DWP must reanalyze its noise, traffic, and visual impact mitigations, and must consider additional Project alternatives that create a lesser impact to the Headworks Spreading Grounds site and its neighbors. The DWP must also consider the cumulative impacts of its plans for the Headworks Spreading Grounds site to ensure the environmental review process complies with CEQA. 2-16

Forest Lawn appreciates this opportunity to comment on the Draft EIR, and hopes to work with the DWP to ensure that the quiet sanctuary of the memorial park is maintained while infrastructure improvements occur to improve life for everyone in Los Angeles.

Very truly yours,

William F. Delvac
of LATHAM & WATKINS LLP

cc: Suzanne Davidson, Esq.

LA\1481014.1

Responses to Letter #2

Response to Comment 2-13:

Please see Section 4.0 of this Final EIR for a description of the Proposed Project as an addition by reference to the Alternatives Chapter of the Draft EIR.

As described in Chapter 15 of the Draft EIR, CEQA Guidelines specify that "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project."

Alternatives considered in the Draft EIR include the No Project alternative and the Onsite Tank Storage with Operational Changes alternative. Because the purpose of the alternatives evaluation is to identify alternatives that would avoid or substantially lessen any of the significant effects of the project, the alternatives chapter focuses on an evaluation of the potential environmental impacts of feasible project alternatives compared to the Proposed Project.

Response to Comment 2-14:

Please see Master Response D in Section 3.0 of this Final EIR for a discussion of Silver Lake Master Plan community values.

Response to Comment 2-15:

As described in Chapter 15 of the Draft EIR, CEQA Guidelines specify that "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project."

"Continued on next page"

Comment Letter #2

Responses to Letter #2

Comment 2-15 (Cont.)

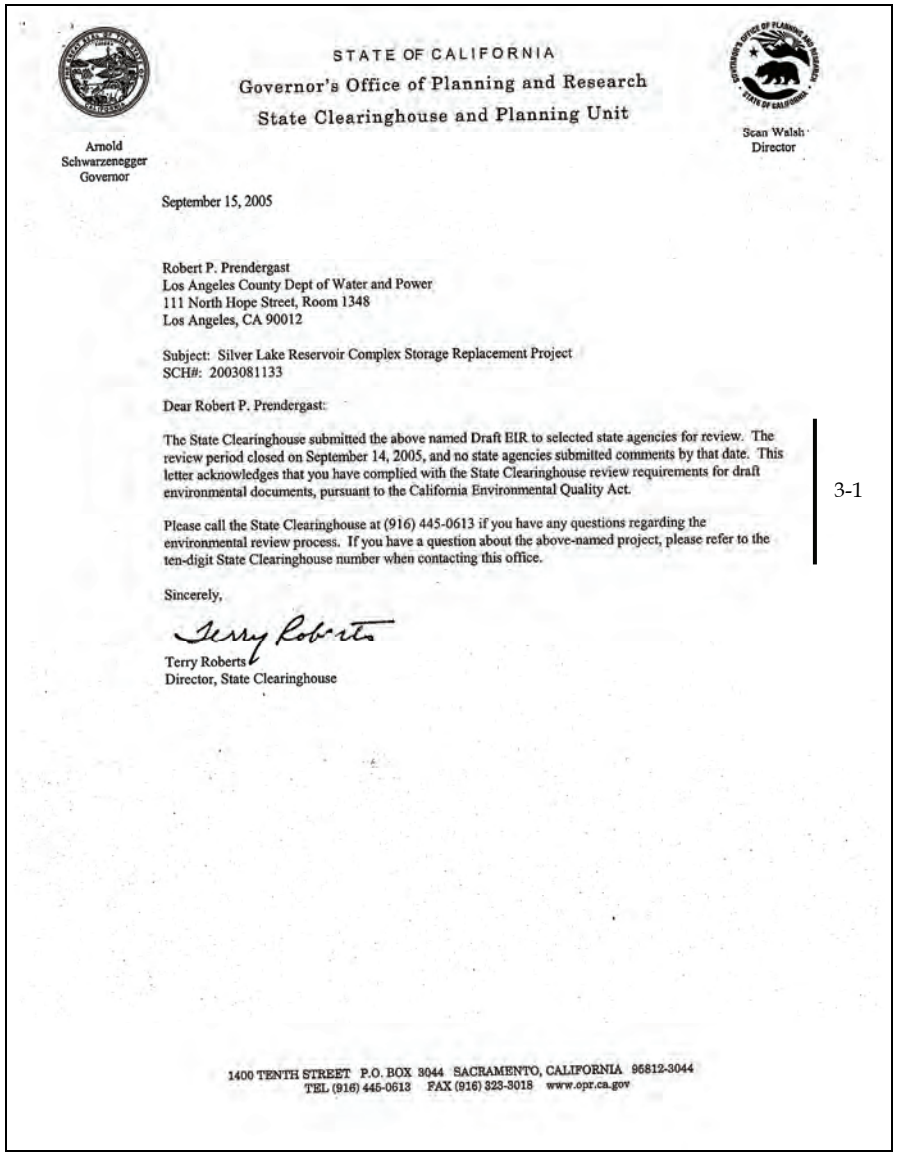
LADWP spent a lengthy period of time evaluating project options, including water treatment and storage at the SLRC and water storage at the HWSG site and other offsite locations. On the basis of this extensive evaluation that included a significant amount of community input, LADWP determined that the Proposed Project met the project objectives while minimizing potential environmental impacts. Because LADWP exercised due diligence in their initial evaluation of the Proposed Project, it has determined that the only alternatives to the Proposed Project are those described in the Alternatives Chapter of the Draft EIR.

Also, please see the response to Comments 2-11 and 2-12, as well as Master Response D in Section 3.0 of this Final EIR.

Response to Comment 2-16:

Please see the above responses to comments 2-1 through 2-15 for detailed responses.

Comment Letter #3



STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Sean Walsh
Director

September 15, 2005

Robert P. Prendergast
Los Angeles County Dept of Water and Power
111 North Hope Street, Room 1348
Los Angeles, CA 90012

Subject: Silver Lake Reservoir Complex Storage Replacement Project
SCH#: 2003081133

Dear Robert P. Prendergast:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 14, 2005, 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.

3-1

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,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

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

Response to Letter #3

Response to Comment 3-1:

Comment noted.

Comment Letter #3

Document Details Report
State Clearinghouse Data Base

SCH# 2003081133
Project Title Silver Lake Reservoir Complex Storage Replacement Project
Lead Agency Los Angeles County Department of Water and Power

Type EIR Draft EIR
Description LADWP proposes to remove Silver Lake and Ivanhoe Reservoirs from direct service to the LADWP water distribution system. Project elements include: a 110 million gallon buried storage reservoir and a 4MW hydroelectric power generation facility at the Headworks Spreading Ground site, regulating station and bypass pipeline around Silver Lake Reservoir, and changed operation of Silver Lake Reservoir Complex.

Lead Agency Contact
Name Robert P. Prendergast
Agency Los Angeles County Dept of Water and Power
Phone 213-367-2188 **Fax**
email
Address 111 North Hope Street, Room 1348
City Los Angeles **State** CA **Zip** 90012

Project Location
County Los Angeles
City
Region
Cross Streets Hwy 134, Forest Lawn Dr., I-5, Sunset Blvd.
Parcel No.
Township **Range** **Section** **Base**

Proximity to:
Highways 134, 2
Airports
Railways
Waterways Los Angeles River
Schools
Land Use Open Space

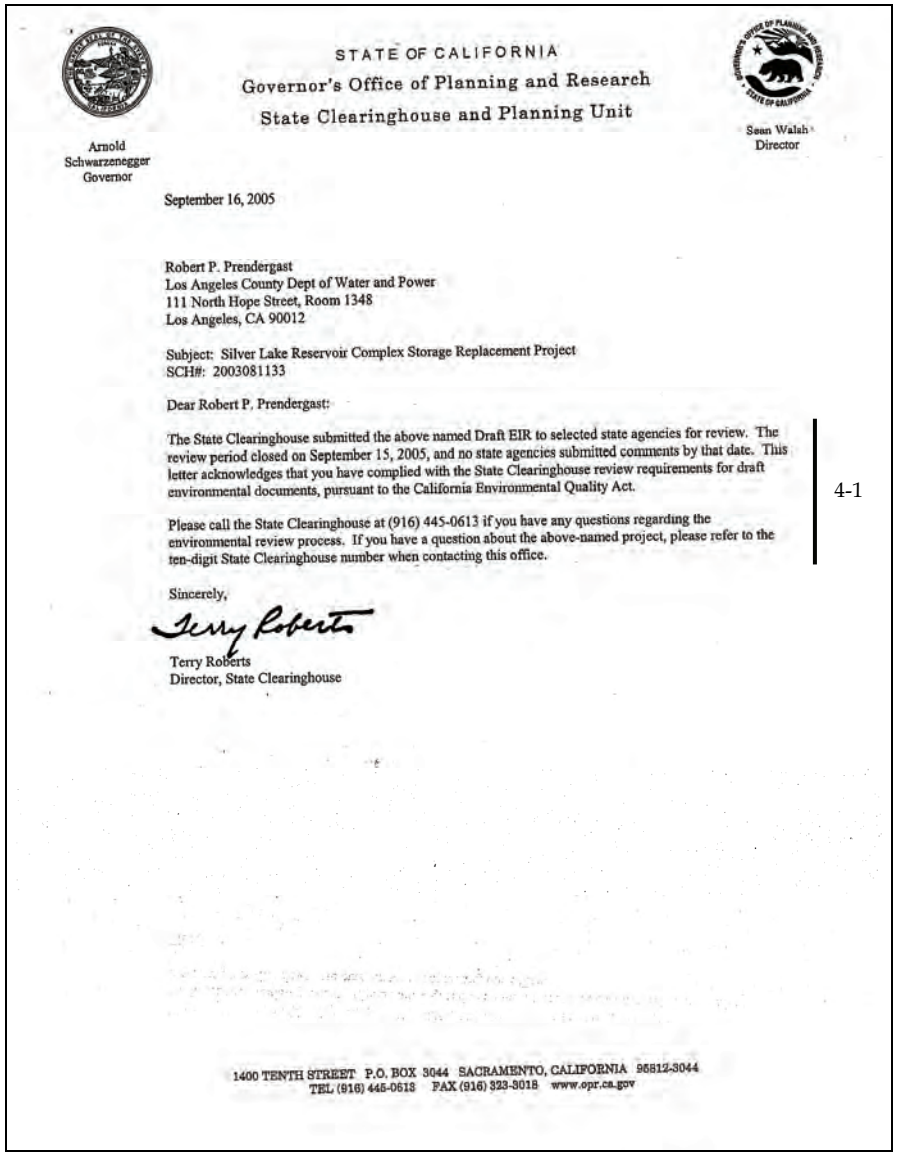
Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Geologic/Seismic; Minerals; Noise; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 5; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 7; Department of Health Services; State Water Resources Control Board, Clean Water Program; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; California Energy Commission; Public Utilities Commission; State Lands Commission; Santa Monica Mountains Conservancy

Date Received 08/01/2005 **Start of Review** 08/01/2005 **End of Review** 09/14/2005

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

Comment Letter #4



STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Sean Walsh
Director

September 16, 2005

Robert P. Prendergast
Los Angeles County Dept of Water and Power
111 North Hope Street, Room 1348
Los Angeles, CA 90012

Subject: Silver Lake Reservoir Complex Storage Replacement Project
SCH#: 2003081133

Dear Robert P. Prendergast:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 15, 2005, 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. 4-1

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,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

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

Response to Letter #4

Response to Comment 4-1:

Comment noted.

Comment Letter #4

Document Details Report
State Clearinghouse Data Base

SCH# 2003081133
Project Title Silver Lake Reservoir Complex Storage Replacement Project
Lead Agency Los Angeles County Department of Water and Power

Type EIR Draft EIR
Description LADWP proposes to remove Silver Lake and Ivanhoe Reservoirs from direct service to the LADWP water distribution system. Project elements include: a 110 million gallon buried storage reservoir and a 4MW hydroelectric power generation facility at the Headworks Spreading Ground site, regulating station and bypass pipeline around Silver Lake Reservoir, and changed operation of Silver Lake Reservoir Complex.

Lead Agency Contact
Name Robert P. Prendergast
Agency Los Angeles County Dept of Water and Power
Phone 213-367-2188 **Fax**
email
Address 111 North Hope Street, Room 1348
City Los Angeles **State** CA **Zip** 90012

Project Location
County Los Angeles
City
Region
Cross Streets Hwy 134, Forest Lawn Dr., I-5, Sunset Blvd.
Parcel No.
Township **Range** **Section** **Base**

Proximity to:
Highways 134, 2
Airports
Railways
Waterways Los Angeles River
Schools
Land Use Open Space

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Geologic/Seismic; Minerals; Noise; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 5; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 7; Department of Health Services; State Water Resources Control Board, Clean Water Program; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; California Energy Commission; Public Utilities Commission; State Lands Commission; Santa Monica Mountains Conservancy

Date Received 08/02/2005 **Start of Review** 08/02/2005 **End of Review** 09/15/2005

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

Comment Letter #5

State of California — The Resources Agency

Memorandum

Date: SEP 16 2005

To: 1. Ms. Nadell Gayou
Resources Agency Project Coordinator
Environmental Review Section, DPLA
901 P Street
Sacramento, California 95814

2. Mr. Robert P. Prendergast
Los Angeles Department of Water and Power
111 North Hope Street, Room 1348
Los Angeles, California 90012

From: **Department of Water Resources**

Subject: SCH #2003081133, Notice of Completion and Environmental Document Transmittal for Silver Lake Reservoir Complex Storage Replacement Project, August 2, 2005, Los Angeles County

The Division of Safety of Dams has reviewed the Notice of Completion and Environmental Document for the Silver Lake Reservoir Complex Storage Project. Silver Lake Dam, No. 6-051, is currently under State jurisdiction for safety.

An application, together with plans and specifications, must be filed with the Division for the proposed removal of each of the reservoirs. 5-1

Based on the information provided, the proposed construction of the covered storage reservoirs may be under State jurisdiction for safety. Section 6002 and 6003 of the California Water Code define that dams 25 feet or higher having a reservoir storage capacity of more than 15 acre-feet, and dams higher than six feet having reservoir storage of 50 acre-feet or more, are under State jurisdiction. 5-2

If the proposed covered storage reservoirs are jurisdictional, a construction application must be filed with the Division for the construction of each reservoir.

All dam safety related issues must be resolved prior to the approval of the applications for the removal or construction of the reservoirs, and the work must be performed under the supervision of a civil engineer registered in California. John L. Vrymoed, Design Engineering Branch Chief, is responsible for the application approval process and can be reached at (916) 227-4660. 5-3

If you have any questions, you may contact Office Engineer Chuck Wong at (916) 227-4601 or Regional Engineer Mutaz Mihyar at (916) 227-4600.

David A. Gutierrez, Chief
Division of Safety of Dams
(916) 227-9800

Linh T. Phan
Received
SEP 27 2005

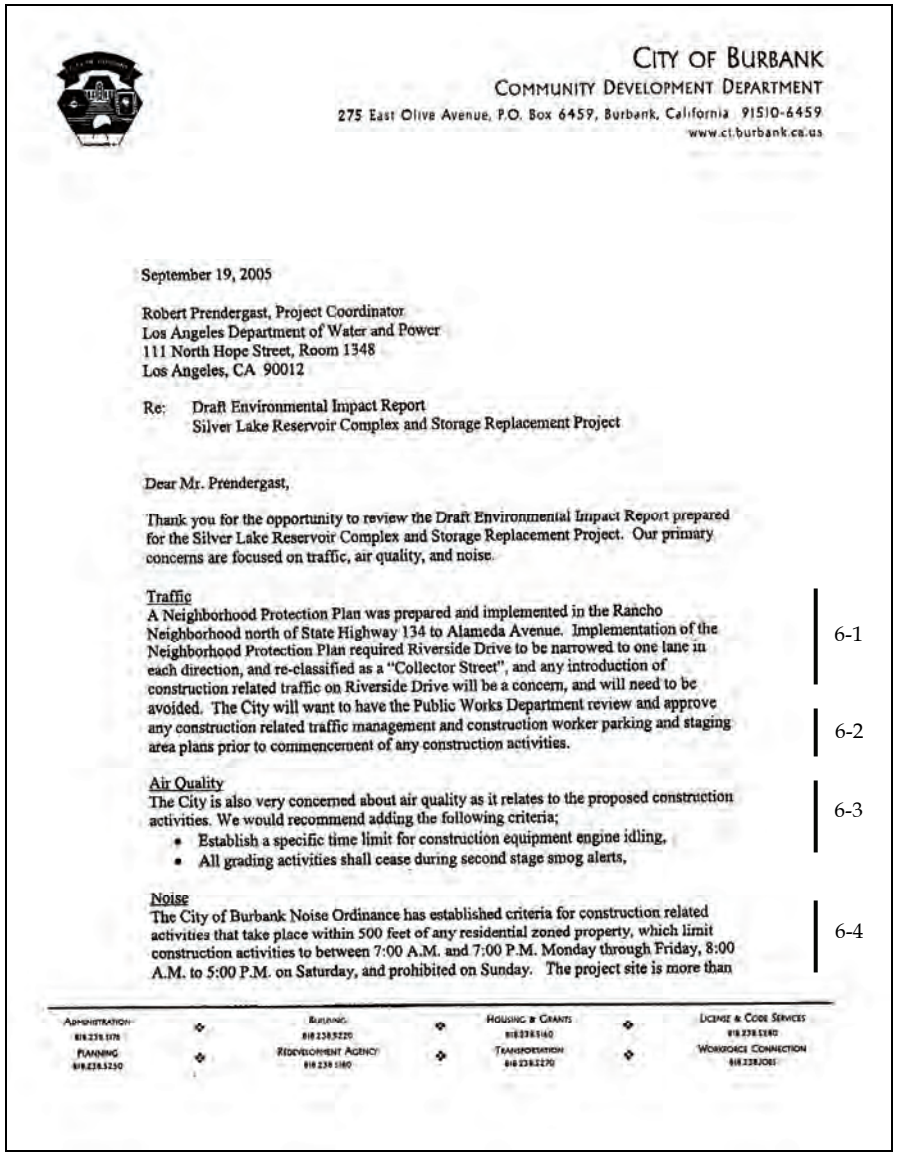
Responses to Letter #5

Response to Comment 5-1:
Comment noted.

Response to Comment 5-2:
Comment noted.

Response to Comment 5-3:
Comment noted.

Comment Letter #6



CITY OF BURBANK
COMMUNITY DEVELOPMENT DEPARTMENT
275 East Olive Avenue, P.O. Box 6459, Burbank, California 91510-6459
www.ci.burbank.ca.us

September 19, 2005

Robert Prendergast, Project Coordinator
Los Angeles Department of Water and Power
111 North Hope Street, Room 1348
Los Angeles, CA 90012

Re: Draft Environmental Impact Report
Silver Lake Reservoir Complex and Storage Replacement Project

Dear Mr. Prendergast,

Thank you for the opportunity to review the Draft Environmental Impact Report prepared for the Silver Lake Reservoir Complex and Storage Replacement Project. Our primary concerns are focused on traffic, air quality, and noise.

Traffic
A Neighborhood Protection Plan was prepared and implemented in the Rancho Neighborhood north of State Highway 134 to Alameda Avenue. Implementation of the Neighborhood Protection Plan required Riverside Drive to be narrowed to one lane in each direction, and re-classified as a "Collector Street", and any introduction of construction related traffic on Riverside Drive will be a concern, and will need to be avoided. The City will want to have the Public Works Department review and approve any construction related traffic management and construction worker parking and staging area plans prior to commencement of any construction activities. 6-1 6-2

Air Quality
The City is also very concerned about air quality as it relates to the proposed construction activities. We would recommend adding the following criteria; 6-3

- Establish a specific time limit for construction equipment engine idling,
- All grading activities shall cease during second stage smog alerts,

Noise
The City of Burbank Noise Ordinance has established criteria for construction related activities that take place within 500 feet of any residential zoned property, which limit construction activities to between 7:00 A.M. and 7:00 P.M. Monday through Friday, 8:00 A.M. to 5:00 P.M. on Saturday, and prohibited on Sunday. The project site is more than 6-4

ADMINISTRATION 818.238.5700 ◆ BUILDING 818.238.5220 ◆ HOUSING & GRANTS 818.238.5160 ◆ LICENSE & CODE SERVICES 818.238.5190
PLANNING 818.238.5250 ◆ REDEVELOPMENT AGENCY 818.238.5180 ◆ TRANSPORTATION 818.238.5270 ◆ WORKFORCE CONNECTION 818.238.5005

Responses to Letter #6

Response to Comment 6-1:

Comment noted. However, if should be noted that Riverside Drive is not identified to be used as a route for construction traffic.

Response to Comment 6-2:

Please see the response to Comment 6-1.

Response to Comment 6-3:

Mitigation Measure AQ-1 requires that equipment idling time will be minimized to the extent possible. If a second stage smog alert were to occur during construction resulting in a cease in grading mandated by a regulatory agency, the construction contractor will be required to comply.

Response to Comment 6-4:

Comment noted. The Proposed Project will comply with all applicable noise ordinances.

Comment Letter #6

500 feet from any residential zoned property, however, the Noise Section of the DEIR makes reference to use of rock crushing and other load equipment, and we would suggest that operation of this equipment is confined to the hours described above. 6-4 (Cont.)

Again, I would like to thank you for the opportunity to review the DEIR and provide our comments.

Sincerely

Roger Baker

Roger Baker
Deputy City Planner

Comment Letter #7

SLRCSR DEIR Comments
CSSLR 9/19/05

These comments have been prepared by the Committee to Save Silver Lake's Reservoirs (CSSLR). Due to the time and limited resources CSSLR has in analyzing this DEIR, the comments are focused only on the project as it affects the Silver Lake Reservoir Complex (SLRC) and the surrounding neighborhood. Absence of comments regarding the area at and surrounding the Headworks site does not in any way constitute an endorsement of proposed activities at that site.

Excerpts from the DEIR are in Arial 10 font. Community comments are in Times New Roman Bold 11 font.

1.0 Introduction

No comments

2.0 Project Description

2.2.3 SLRC Facilities

p. 2-17
Facilities to be constructed and operated at or near the SLRC include a bypass pipeline and a regulating station, as shown in Figure 2-5. Additionally, two relief stations to support the regulating station would be constructed, and activities necessary to remove Ivanhoe and Silver Lake Reservoirs from the distribution system would be conducted. Construction and operation information for these facilities and activities is described in detail below.

There is no mention of the current use of SLRC or of the fact that there are several buildings on site that will probably have no future use for LADWP. What will come of the many structures on site? 7-1

p. 2-17
Construction working hours for all activities would be between 7:00 a.m. and 8:00 p.m., Monday through Friday and 8:00 a.m. and 5:00 p.m. Saturday.

Two relief stations and a sixth workweek day have been added to the project have been added to the project since the NOP. The schedule is not any shorter and it's doubled in trucks and labor. How has the project changed significantly since that document was released? 7-2

Construction will be ongoing during peak rush hours. Due to the extremely high traffic burden the community already experiences due to its proximity to several commuter routes, a comprehensive traffic mitigation plan must be completed in a timely manner with the involvement of the community and LADOT. 7-3

2.2.3.1 Bypass Pipeline

2.2.3.1.1 Overview

p. 2-17

The use of vague terms, "anticipated, expected, and likely" exists throughout this DEIR. This creates a situation in which the community will have little recourse if problems do arise. This draft doesn't have LADWP committed to a tunneling scheme under WSLD. If 7-4

1 of 45

Responses to Letter #7

Response to Comment 7-1:

The Draft EIR describes those activities related at the SLRC that LADWP intends to undertake related to the Proposed Project. The SLRC SRP would have no impact on the buildings at the SLRC.

Response to Comment 7-2:

The NOP included a description of the Proposed Project in sufficient detail to allow for a meaningful response by reviewers. The two relief stations are appurtenances to the Silver Lake Reservoir bypass pipeline that is included in the NOP. The NOP does not address the number of workdays in the work week, but the proposed schedule is included in the Draft EIR. The project description, as described in the Draft EIR plus minor clarifications described in this Final EIR, reflects the whole of the Proposed Project.

Response to Comment 7-3:

Mitigation measures described in Chapter 9 of the Draft EIR include the preparation of a traffic management plan to be prepared in conjunction with LADOT.

Response to Comment 7-4:

Because a lead agency cannot foresee with complete certainty how any project will be implemented, "anticipated, expected, and likely" are terms commonly used in Environmental Impact Reports to give a lead agency reasonable flexibility in project implementation. However, it is believed that the project description, as described in the Draft EIR plus minor clarification described in this Final EIR, reflects the whole of the Proposed Project. The only bypass pipeline construction scenario described in the Draft EIR is tunneling around the SLRC; the Draft EIR states on page 2-17 that the bypass pipeline "would be tunneled beneath various streets…" LADWP does not have plans to drain the reservoirs to build a different bypass pipeline; if LADWP were to determine a different bypass scenario is warranted, additional environmental documentation would be prepared and circulated for public review and comment as required by CEQA.

Comment Letter #7

SLRCSR DEIR Comments
CSSLR 9/19/05

LADWP ends up draining the lakes to build a different bypass line how will such a draining be mitigated?

p. 2-17
The pipe would be tunneled beneath various streets, and is anticipated to begin at the intersection of West Silver Lake Drive and Armstrong Avenue….

DWP has slated a few projects in this intersection that will require a pit for an undetermined period in 2006, again for several weeks in 2007, and again for several weeks in 2013. The cumulative effects of having multiple projects in this single intersection surrounded by homes exemplify the harsh impact several projects can have on an otherwise quiet community. Additionally, this intersection should be considered a secondary artery for the community. How much construction noise, traffic, and compromised air quality can people who inhabit homes adjacent to this area be expected to endure? What affect will these constant disruptions to the neighborhood have on property values? 7-5

2.2.3.1.2 Construction
p. 2-18
…Based on an estimate of 20 feet of tunneling per day and 10-cubic-yard capacity dump trucks, two to three truckloads of soil would be exported from the site each day for 278 days during the periods of June 2007 through February 2008 and October 2008 through February 2009.

There have been 91 calendar days and working Saturdays added to the schedule. There is a gap in the tunneling schedule. What is to occur between February 2008 and October 2008? If all work on site will be halted, will the site be open for its current use? Will it be abandoned? Will it be secure? 7-6

2.2.3.2 Regulating Station and Relief Stations
2.2.3.2.1 Overview

p. 2-23
Access to each vault would be either through a 3-foot by 3-foot steel hatch or a 48-inch-diameter lid. In addition, there would be six valve actuators housed in a 48-inchdiameter by 14-foot-high can (cylinder structure) that is buried and has top access. All hatch/lid and vault dimensions are approximate.

p. 2-23
Aboveground facilities anticipated include two ventilation hoods (4 feet in diameter and 3 feet high), four ventilation stand-pipes (1 foot in diameter and 3 feet high), and a control cabinet (4 feet square and 6 feet high). The control cabinet may be located near the existing chlorination building.

The DEIR fails to properly analyze the impact on the play field that will be affected by this project. The following analysis is a bit more thorough, but an elevation of the finished project is the only proper way to represent the project for this EIR. There will be four vaults: a regulating station vault with 2 hatches, a bypass valve vault with an unstated number of hatches, and isolation valve vault with an unstated number of hatches? There is also a 48" diameter valve actuators cylinder with top access. The total number of hatches needs to be properly stated.

(The total number suggested by Robert Prendergast at LADWP is 10 48" diameter hatches) 7-7

2 of 45

Responses to Letter #7

Response to Comment 7-5:

Cumulative impacts were described in Chapter 16 of the Draft EIR. Additional information about cumulative impacts is included in Master Response C in Section 3.0 of this Final EIR.

Response to Comment 7-6:

Please see Master Response E in Section 3.0 of this Final EIR for additional information regarding the construction schedule for the Proposed Project at the SLRC. The jacking and receiving pits would be closed during any gaps in construction and traffic would be returned to normal operating conditions.

Response to Comment 7-7:

The Draft EIR describes the regulating station in Chapter 2, Project Description, and in various resource chapters. Additionally, Master Response A in Section 3.0 of this Final EIR has been prepared to provide additional information about the regulating station.

Comment Letter #7

SLRCSR DEIR Comments
CSSLR 9/19/05

The DEIR offers a choice of either a 9 sq. ft. hatch or a 48" diameter 12.5 sq. ft. round lid. (Total cumulative lids ground surface minimum is 125 sq. ft.): Above ground 2 hoods 3' high at 12.5 sq. ft. each (25 sq. ft.) (75 cu. ft.) , 4 standpipes 3' high – 1' diameter (4 sq. ft.) (12 cu. ft.), and a control cabinet 6' high – (16 sq. ft.) (96 cu. ft above ground level). (With round lids, the total lost ground surface minimum is 170 sq. ft.) (Above ground minimum is 103 cu. ft.) What is the actual sq. footage of the existing lawn area (what area does the noted 30K sq. ft. represent?) What percentage of the lawn will be lost and how will the placement of the lids affect uninterrupted lawn area? Without an elevation rendering of the complex and a description of the outside dimensions of the regulation station complex as a whole, this EIR is incomplete. 7-8

Will the existing concrete pads, lids, vents and other assorted covers be rendered obsolete and removed after the regulating station is built, or will all of the new obstructions be in addition to the existing ones? How does the answer to this question affect the overall square footage of park space lost or of reduced quality? 7-9

p.2-24
The regulating station and associated facilities would likely be constructed within a 30,000-square-foot area within the grassy area just south of Silver Lake Reservoir dam.

CSSLR measurement of the existing park-usable grassy area on the site of the proposed regulating station is approximately 21,321 sq. ft. from the Chlorination Station to the fence to the shrubbery below W. Silver Lake Dr. (WSLD) and Van Pelt Pl. All of the remaining area behind the Chlorination Station is chronically muddy and not usable as park space. 7-10

p. 2-24
Construction of the first relief station would take approximately 6 to 7 weeks.

Which 6-7 weeks of the year? The timeline is extremely vague. Will any streets or parking spaces be closed during construction? It seems that Silver Lake Blvd. (SLBL) will be closed during vault construction since the vault is under the middle of the street. How many days of the 6-7 weeks will be used for vault construction? Why is there no mention of the impact of this street closure of this major thoroughfare mentioned here? 7-11

p. 2-24
The realignment of the 60-inch trunk line would impact the parking lot at 3125 London Street. Construction of the second relief station would take approximately 11 weeks.

Which 11 weeks of the year? Will any streets or parking spaces be closed during construction? It seems as if there will be street closures for this site as well, yet these closures are not analyzed. 7-12

2.2.3.2.2 Construction
p. 2-24
Construction of the regulating station and relief stations would take place approximately from April through November 2009.

This conflicts with Table 6 on p. 33 in Appendix F, which states that construction on the regulating station will last from April 2009 through November 2010. What is the actual timeline for these three related projects? Will it take the same amount of time to build the relief stations as it will to build the regulating station? Will the construction be concurrent 7-13

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Responses to Letter #7

Response to Comment 7-8:

Please see Master Response A in Section 3.0 of this Final EIR, which has been prepared to provide additional information about the regulating station.

Response to Comment 7-9:

Please see the response to comment 7-8.

LADWP will remove concrete pads, lids, vents, and other assorted covers that have been rendered obsolete after the regulating station is constructed.

Response to Comment 7-10:

Please see the response to comment 7-8.

Response to Comment 7-11:

On-street traffic impacts related to construction of the relief stations are described on page 9-60 of the Draft EIR. Additional detail regarding the construction schedule for the Proposed Project has been prepared; please see Master Response E in Section 3.0 of this Final EIR.

Response to Comment 7-12:

On-street traffic impacts related to construction of the relief stations are described on page 9-60 of the Draft EIR. Additional detail regarding the construction schedule for the Proposed Project has been prepared; please see Master Response E in Section 3.0 of this Final EIR.

Response to Comment 7-13:

The dates in the Project Description are correct; the dates in the Traffic and Transportation Technical Report were misstated. Additional detail regarding the construction schedule for the Proposed Project has been prepared; please see Master Response E in Section 3.0 of this Final EIR.

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for all three projects? The DEIR should have current information regarding the construction schedule and a construction timeline.

2.2.3.3 Removal of Silver Lake and Ivanhoe Reservoirs from Service Construction
Silver Lake Reservoir

p. 2-28
The water level in Silver Lake Reservoir would be lowered approximately 16 feet, to an elevation of 435 feet. Typical operating levels for Silver Lake Reservoir are between 440 and 451 feet, although the elevation of Silver Lake Reservoir was at 437 feet as recently as December 2004. The water level in Ivanhoe Reservoir would be lowered approximately 18 feet to an elevation of 433 feet. Ivanhoe normally operates at full elevation of 451 feet.

Why was the water level lowered to 437' in December 2004 and will that water level have a significant impact on the negotiated water level LADWP will maintain after SLRC is removed from service? Ivanhoe is a shallow reservoir. How deep will it be if lowered to 433'? What affect if any will the lowering of the water levels have on the integrity or stability of the dams? 7-14

p. 2-28
Activities required to remove Silver Lake Reservoir from service would be conducted approximately between October 2007 and April 2008.

p. 2-28
It would take roughly 2 months for the reservoirs to be lowered, approximately 2 months for the valves and appurtenances to be installed, and roughly 2 months for reservoir elevation to return to operating levels.

Will this lowering coincide with the lowering required for the Lower Reach River Supply Conduit Replacement Project (RSC)? The RSC DEIR is vague about when the lowering will occur, and neglects to mention the SLRC end of the project in its Cumulative Projects chapter. Will Ivanhoe be lowered once to take Silver Lake Reservoir offline in 2007/2008 and again in 2013 to take Ivanhoe offline? Does this mean the Ivanhoe and Silver Lake levels will be lowered three times at six months each? An 18' lowering of the water level at Ivanhoe Reservoir will remove water views from many of the neighboring homes. If the water level is lowered for the three projects, then it can be expected that eighteen months of water view loss will have a detrimental effect on the community and property values while the views are compromised. 7-15

The concrete/asphalt banks of Silver Lake Reservoir have unsightly patched of tar and have long been in need of replacement. Will the asphalt/concrete banks be naturalized, modified, or repaired during those times that the water levels are lowered? 7-16

p.2-28
Construction would require the disturbance of less than an acre within the SLRC at the northeast corner of Silver Lake Reservoir and within the area where the regulating station would be constructed.

Where on the northeast corner, when, and how long? What will the disturbed area of the 7-17

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Responses to Letter #7

Response to Comment 7-14:

Silver Lake Reservoir was lowered to 437 feet in December 2004 for operational purposes. As described in the Draft EIR, Silver Lake Reservoir would continue to be maintained at historical operating levels (typically between 440 and 451 feet).

Ivanhoe Reservoir would be approximately 11 feet deep when the water level is lowered to 433 feet temporarily, and the water level in Ivanhoe would be lowered no more than 5 feet per day to comply with the requirements of the Division of Safety of Dams.

Response to Comment 7-15:

LADWP will attempt to coordinate the required lowering of the water levels in Ivanhoe and Silver Lake Reservoirs in order to take the Silver Lake Reservoir out of service with the reservoir lowering required for the Lower Reach RSC Project. It is unnecessary to lower reservoir levels in order to take Ivanhoe Reservoir out of service. Therefore, the water level in the reservoirs would likely be lowered only once for the Proposed Project, as described in the Draft EIR, for a total of 6 months, although the reservoirs would be at their lowest levels only during 2 of those months.

Response to Comment 7-16:

There are no plans to modify the banks of Silver Lake Reservoir in conjunction with the Proposed Project.

Response to Comment 7-17:

Additional detail regarding regulating station construction and overall construction schedule has been prepared; please see Master Responses A and E, respectively, in Section 3.0 of this Final EIR.

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future regulating station look like in the interim period between SL removal and regulating station construction? If not restored to usable park space in interim, the construction timeline should reflect that the park space would be unavailable for the entire period. How this long-term loss of park space be mitigated? 7-17 (Cont.)

Ivanhoe Reservoir

p. 2-29
The existing 60-inch Silver Lake bypass pipeline just south of Silver Lake Dam would also be cut and plugged. Construction would require the disturbance of the area just east of where the regulating station would be constructed.

p. 2-29
All of the above construction would take 2 to 3 months, estimated to be between May and July 2013.

This Recreation Center park construction in 2013 is to occur years after the Regulating Station construction has been completed. Will the grassy area be usable park space in the interim, or will the park space will be unavailable for the entire period. What is the mitigation for long-term loss of park space? 7-18

Reservoir Operation/Maintenance
p. 2-29
Following the removal of the reservoirs from water distribution system, the reservoirs would be allowed to revert to a more natural state. This would be accomplished by discontinuing the addition of water treatment chemicals. LADWP expects that, as a result, the water in the reservoirs would generally change from a clear appearance to a less transparent, green color. This change in color would be due to increased algal growth because of sufficient existing nutrient concentrations. It is not expected that the amount of algae would exceed that which has been experienced periodically in the past. LADWP has had positive water quality experiences at Hollywood and Encino Reservoirs since they were removed from service.

Hollywood Reservoir is approx. 200' deep and therefore probably shouldn't be used as an example of how SLRC, a maximum 40' deep pond will react to naturalization. Encino is also a deep reservoir? There needs to be data included here that pertains to bodies of water the same depth as SLRC. 7-19

p. 2-29
It is not expected that the amount of algae would exceed that which has been experienced periodically in the past.

What historic record of algae growth does LADWP use for this statement? Do they have any data from the period before chlorination? 7-20

RESERVOIR GIVES UP BOYS' BODIES.
Los Angeles Times Aug 23, 1914; Ps pg. II3

> "The immense amount of moss that hugs the floor of the [Silver Lake] reservoir made it impossible for the city employees to work effectively with the grappling irons. Finally a systematic attack on the moss beds was made. And many hundreds of tons were taken from the lake and piled up

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Responses to Letter #7

Response to Comment 7-18:

Please see the response to Comment 7-17.

Response to Comment 7-19:

There is limited data available on open potable water reservoirs with depths similar to Silver Lake Reservoir being allowed to revert to a non potable water body for aesthetic purposes. Data related to Hollywood Reservoir, and more recently Stone Canyon and Encino Reservoirs, are the most complete and pertinent data available. LADWP proposes to follow an adaptive management plan whereby potential management tools will be evaluated while and after the reservoirs achieve a more natural condition.

Response to Comment 7-20:

LADWP has retained information pertaining to algae growth in Silver Lake Reservoir going back to the early 1960's. LADWP was capable of adding chlorine to Silver Lake and Ivanhoe Reservoirs during that period.

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on the shore to open the water sufficiently to continue the search for the bodies."

The above article indicates that the body of water in its natural state suggests that algae (probably misidentified as moss by the LA Times) may be a big problem. Have the STO limnologists studied SLRC with the specific task of predicting the water's reaction to naturalization? Are they limnologists or water feature designers? 7-21

p. 2-30
LADWP proposes to follow an adaptive management plan whereby potential management tools will be evaluated after the reservoirs achieve a more natural condition. The plan includes semiannual monitoring for nutrients (nitrogen and phosphorous); bimonthly water quality surveys (algal count, chlorophyll, transparency); turning on the mixer as needed; and in-reservoir alum treatment in the unexpected event that algae reaches excessive levels.

How often will they monitor the water up to the point that it reaches a balanced state that is satisfactory? This statement only deals with water quality after a balance is reached. 7-22

p. 2-30
All of the above would be described in detail in a Property Maintenance and Management Plan (PMMP) for the SLRC. The PMMP would be developed in consultation with the Silver Lake community, and would ensure that the reservoir complex is maintained despite being a nonoperating facility, taking community values into account. At a minimum, the PMMP would address the following elements:
- Water quality
- Water level
- Landscaping
- Facility maintenance
- Vector/pest control

There are no guarantees that LADWP will build any of the projects as described in this DEIR. The community must be allowed oversight of the construction projects around the SLRC and provided with expert consultants to ensure that the projects around SLRC described in this DEIR, are being built as analyzed in this EIR. The community must also be allowed to attend construction meetings regarding the projects at SLRC in order to ensure the projects are being built as discussed. 7-23

Additionally, changes in management that occur throughout the years of construction can potentially have an adverse effect on relations between the community and the sub-contractor. If an LADWP or sub-contractor project manager is replaced, the community must be notified and all measures must be taken to ensure that replacement managers understand and will adhere to the all mitigation as required by this EIR. 7-24

Where is a detailed description of the PMMP, and why was the name changed from SLRC LTMMP? There is no mention of foreseeable options for future use or of a plan to identify an organization or organizations to take over stewardship of the property, occupy the existing buildings, or to re-use the existing buildings, LADWP's response, dated December 1, 2004, to earlier drafted comments states that "any issues that deal with the future of the SLRC and the implementation of the SLMP will be addressed in a Long Term Maintenance & Management Plan (LTMMP) that will be developed outside of the EIR process." How is this process to unfold? What are the options to be? When will the process begin? Will the 7-25

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Responses to Letter #7

Response to Comment 7-21:

LADWP's experience with removing reservoirs from potable water service indicates that Ivanhoe and Silver Lake Reservoirs will experience occasional algae blooms after they are removed from service. LADWP will use the services of Water Treatment Operators and Water Biologists to monitor the conditions of the reservoirs and follow an adaptive management plan. A limnologist will be used as necessary.

Response to Comment 7-22:

The adaptive management plan described in the Draft EIR that includes semi-annual monitoring for nutrients and bimonthly water quality surveys would be utilized beginning when the reservoirs are removed from potable water service.

Response to Comment 7-23:

CEQA requires LADWP to address any changes to the project that would result in significant impacts to be addressed in a supplemental or subsequent EIR.

The community will be provided with a venue(s), as well as a contact person, for input regarding the SLRC SRP.

Response to Comment 7-24:

LADWP will provide notice of project management changes to interested parties.

Mitigation measures will be adhered to regardless of changes in project management. The status of mitigation progress will be measurable against the Mitigation and Monitoring Plan (MMP).

Response to Comment 7-25:

A detailed discussion of the Property Management and Maintenance Plan is outside the scope of the Draft EIR and will be developed in conjunction with the Silver Lake community.

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Master Plan be taken into consideration in the formation of a future management plan? With Silver Lake Reservoir being scheduled to go offline as soon as 2008, this process needs to begin immediately.

There should be a detailed description of the SLRC property that is to be part of the proposed PMMP. The current appearance of the property shows that some areas have suffered from deferred maintenance and need to be repaired in order to be acceptable for an outside agency that will assume any responsibility for future maintenance.

7-25 (Cont.)

To remove SLRC from the Los Angeles water supply reduces the supply of emergency water available to the city in the event of a catastrophic failure of the earthquake prone aqueduct system. This EIR fails to properly analyze the Los Angeles emergency water supply system.

7-26

There is no mention here of dam maintenance. LADWP must commit to maintaining the dams. Additionally, if the DSOD requires removal of the dams for any reason, there must be mitigation provided to include reconstruction of the dams to maintain the water views. If reconstruction of the dams due to catastrophe is considered unfeasible, then mitigation for loss of the dams needs to be analyzed.

7-27

3.0 Land Use

3.1.3.3 Land Use Plans
p. 3.18
The SLRC is located within the planning areas of the City of Los Angeles General Plan, Silver Lake-Echo Park Community Plan (the relevant Land Use Element of the General Plan), and the Silver Lake Master Plan

The name of the community plan has been changed to include "Elysian Valley."

7-28

p. 3-27
The SLEPCP area comprises approximately 7.26 square miles, with an estimated 2002 population of 78,988 and population density of 10,888 persons per square mile. Land use in the SLEPCP area is distributed roughly as follows: single-family residential, 9.7 percent; multifamily residential, 19.2 percent; commercial, 4.4 percent; industrial, 5.4 percent; open space and public facilities, 41.9 percent; public streets, 19.5 percent.

The open space and public facilities figure of 41.9% including Dodgers Stadium is misleading. Dodgers Stadium land is mostly asphalt parking lot and is of no use to the community when not serving as a parking lot. The freeways are also being included in this figure. It seems a bit convenient and misleading to even include Elysian Park in this study since it's not very close to the SLRC, and the community on the other side of the park is not included in the Silver Lake-Echo Park Community Plan.

According to the National Recreation & Parks Association, the acceptable standard ratio of park space per person is 10 acres/1000 residents. Excluding Elysian Park, which serves the Echo Park area and is adjacent to Silver Lake but not actually a part of the community due to a freeway/heavily used commuter route that separates it, three small parks serve Silver Lake:

7-29

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Responses to Letter #7

Response to Comment 7-26:

It should be noted that the City of Los Angeles receives its water supply from several sources including: the Los Angeles Aqueduct, the Colorado River Aqueduct, the California Aqueduct, and local groundwater aquifers. LADWP has maintained redundancy in the City's water supply to mitigate the impacts of the loss of any single water source.

When analyzing the impacts of removing Silver Lake and Ivanhoe Reservoirs from service as potable water storage reservoirs and providing replacement potable water storage at the proposed Headworks Reservoir, the LADWP considered reservoir storage capacity requirements of the American Water Works Association and the Los Angeles Fire Department, as well as its own Water Quality & Operations Business Unit's reservoir storage requirements. Hydraulic studies of the potable water distribution system, including distribution system numerical modeling and computational flow dynamics modeling, were completed by LADWP in order to determine impacts of the proposed project on the City's potable water supply. The proposed 110 million gallon Headworks Reservoir will be able to meet the operational storage requirements in the distribution area currently supplied by Silver Lake and Ivanhoe Reservoirs.

Response to Comment 7-27:

The dams at the SLRC will remain under the jurisdiction of the Department of Dams and would be maintained in accordance with state mandated requirements.

Response to Comment 7-28:

The new name of the community plan is the Silver Lake-Echo Park-Elysian Valley Community Plan (SLEPEVCP); see Section 4.0 of this Final EIR for this correction.

Response to Comment 7-29:

See next page.

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Bellevue Park: 9 acres
Silver Lake Recreation Center: 3.73 acres (this project)
Tommy Lasorda Field: 1.8 acres

Total Silver Lake Park Acreage: 14.53 acres

Acres/thousand residents
Los Angeles City average: 0.4acres/1000 residents
Silver Lake total: 14.53 acres/35,000 residents/40,000 stakeholder per SLNC (or)
0.00041514 acres/1000 residents

7-29 (Cont.)

For this DEIR to include a professional baseball stadium/ asphalt parking lot and a large grouping of freeways to conclude that this neighborhood has 41.9% open space misrepresents this intensely park-starved neighborhood as having parks to spare. The acreage of Elysian Park without Dodgers Stadium, the surrounding parking lot, and the freeways is unknown, but it is certain that even with usable Elysian Park land considered in the formula, this region doesn't approach the city average or the national acceptable standard of park acreage per capita.

Silver Lake-Echo Park Community Plan
p.3-33
... Chapter 5 of the SLRPCP is applicable to the SLRC SRP in that the section addressing public open space and plazas within a discussion of community design and landscaping guidelines includes Silver Lake Reservoir Master Plan Design Guidelines. This section of the SLEPCP states that: The Silver Lake Reservoir Master Plan is a long-range planning tool for the reservoir and environs...

Note typo: SLRPCP should be SLEPCP. 7-30

Silver Lake and Ivanhoe Reservoirs Master Plan

p. 3-33
For any project at the site, DWP, as owner of the property, will be the lead agency in terms of project approval for CEQA documents and will cooperate with other agencies or other organizations during their development of all environmental and construction documents for approved projects at the site. However, DWP will develop the required environmental and construction documents for community enhancements when they are used as mitigation for a department project.

This quote from the Silver Lake Master Plan was written before LADWP had plans to take the reservoirs offline and all potential projects on their property would have been considered as mitigation. LADWP as owner of SLRC must cover the costs of any environmental documents required for improvements to their property. 7-31

3.2.3 SLRC
3.2.3.1 Construction

p. 3-35
... Construction of the regulating station would temporarily restrict access to a portion of the

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Responses to Letter #7

Response to Comment 7-29:

The discussion of the open space and public facilities contained in the Silver Lake-Echo Park-Elysian Valley Community Plan (SLEPEVCP) is included in the Draft EIR because the Silver Lake community is part of the SLEPEVCP. The discussion is not intended to wholly characterize the state of the Silver Lake community.

Response to Comment 7-30:

Comment noted and incorporated by reference.

Response to Comment 7-31:

The existing Silver Lake Master Plan is the only guiding document that has been prepared for the SLRC. LADWP would work closely with the proponent of any improvements to their property to address the costs of any environmental documents required.

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grassy area south of Silver Lake Reservoir Dam and adjacent to the SLRC. Because construction activities are of a short duration and access to the area will be restored following construction, this is not considered to be a significant impact to recreation.

The ancillary physical structures, whether they be flat and flush with the ground or above ground are permanent, and obstructive to the current use of the Recreation Center park areas, and therefore the access is not fully restored without being returned to the exact state the park is in at this time. 7-32

3.2.3.2 Operation

p. 3-35
Operation of the subsurface bypass pipeline and regulating station would not conflict with existing land uses or disrupt or divide the physical arrangement of the Silver Lake community.

The regulating station is not all subsurface so it does conflict with existing land uses. The space is currently grass and any surface other than grass alters and disrupts the current use. 7-33

p. 3-36
The addition of the regulating facility in the grassy area south of Silver Lake Dam would add several small aboveground structures (ventilation hoods and stand-pipes and a control cabinet, as described in Chapter 2) in a park area. These structures would modify somewhat the existing character of the area, but would not take up a large amount of area and would only slightly decrease the area available for recreation. This impact is not considered to be significant.

The overall square footage taken into consideration should not be limited to the access panels and above ground structures. The structures are scattered throughout a site and thus affect the potential recreational use of the site as a whole. There should be a formula to define what minimal size an uninterrupted area must be to provide the same recreational functions of the area as it exists today. There must be a rendered elevation of the estimated finished project before its impact can be properly assessed in this EIR. 7-34

p. 3-36
Additionally, the facilities would be consistent with goals identified in the Silver Lake and Ivanhoe Reservoirs Master Plan.

Where in the Master Plan is a goal identified that has structures aboveground on the grassy slope? 7-35

04.0 Earth Resources
4.1.3 SLRC

p. 4-4
The site consists of LADWP-owned Silver Lake and Ivanhoe Reservoirs and related facilities. Silver Lake is located approximately 5 miles northwest of downtown Los Angeles, just east of Griffith Park. The community of Silver Lake surrounds SLRC and is bordered by I-5 to the north, State Highway 134 and Glendale Boulevard to the east, Sunset Boulevard to the south, and Griffith Park Boulevard to the west.

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Response to Comment 7-32:

The current use of the grassy area proposed for the regulating station is joint park space and LADWP facilities. Please see Master Response A in Section 3.0 of this Final EIR for additional information regarding the regulating station.

Response to Comment 7-33:

Please see the response to comment 7-32.

Response to Comment 7-34:

Please see the response to comment 7-32 and 7-8.

Response to Comment 7-35:

The Silver Lake Master Plan addresses the need to continue to use the LADWP-owned SLRC for water distribution facilities.

Please also see the response to comment 7-32.

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This is incorrect: the east border is SR-2 and Glendale Blvd., not SR-134. 7-36

4.3 Mitigation Measures

The language "as feasible" has been added to allow for mitigation measure failures. Is there a contingency plan for when mitigation measures are not feasible? What factors will determine what is feasible? 7-37

4.3.1 Construction

Mitigation Measure ER-1: Soil Resources

p. 4-11
... • Adjacent streets and roads will be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

Care must be taken to prevent further traffic snags or parking shortages due to end of day street sweeping. 7-38

NOTE: The LADWP letter dated 12/1/2004 states that Section 4.3.2 will include the following language: "The project description will be revised to include that the reservoirs will remain under DSOD jurisdiction where LADWP will be required to maintain the structural integrity of the reservoirs." The revision is not found. 7-39

5.0 Water Resources

5.1.3 SLRC

5.1.3.1 Surface Water

Reservoirs

p. 5-4
Silver Lake and Ivanhoe Reservoirs have water surface areas of approximately 77 and 8 acres, respectively. Maximum depths are about 41 feet for Silver Lake and 30 feet for Ivanhoe Reservoir.

If Ivanhoe's water level will be reduced 18', what effect will the sun hitting the bottom of the reservoir have on algae growth? 7-40

p. 5-4
At potable water reservoirs, influent water is chlorinated;

Does LADWP have access to non-chlorinated or untreated water for maintaining the water levels after the reservoirs are taken off-line? What is the source of the water? How is it treated? How will water treatment affect the water over many years? Will there be any detrimental effects due to the water not being refreshed as it currently is? 7-41

p. 5-4
Turnover time for Silver Lake is typically from approximately 1 to 2 weeks; Ivanhoe Reservoir turnover time is as high as 1 day.

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Responses to Letter #7

Response to Comment 7-36:

Comment noted and incorporated by reference into this EIR.

Response to Comment 7-37:

LADWP has removed the "as feasible" portion of the earth resources mitigation measures. Please see Section 4.0 of this Final EIR for revised mitigation measure wording.

Response to Comment 7-38:

LADWP will ensure that street sweeping is scheduled so as to not cause unnecessary traffic delays during peak traffic flow periods.

Response to Comment 7-39:

The additional language has been added. Please see Section 4.0 of this Final EIR for the requested verbiage.

Response to Comment 7-40:

The water in Ivanhoe Reservoir will continue to be chlorinated during the time the water level is lowered, so adverse algae growth is not anticipated. Also, the water level would be lowered during the winter months, to further reduce the likelihood of adverse algae growth.

Response to Comment 7-41:

Water added to the reservoirs in the future may be chlorinated, chloraminated, dechlorinated, or dechloraminated. To address water quality over many years, LADWP would follow an adaptive management plan whereby potential management tools will be evaluated while and after the reservoirs achieve a more natural condition. As described in the Draft EIR, the plan includes semiannual monitoring for nutrients (nitrogen and phosphorus); bimonthly water quality surveys (algal count, chlorophyll, transparency); turning on the mixer as needed; and in-reservoir alum treatment in the unexpected event that algae reaches excessive levels.

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Chapter 2 states it take 2 months to lower the levels 16 feet, and another 2 months to bring the levels back up again? This is not clear. 7-42

p. 5-4
Chlorine concentrations maintain water quality and water clarity, and preclude fish life.

If fish life is desirable for a future management plan, will there be non-chlorinated or untreated water available for maintaining water levels? If there is no untreated available, how will the addition of treated water affect a fish habitat? If the water used to maintain water levels is chloraminated, what process will be used to dissipate the ammonia that will become more concentrated over many years? 7-43

Quality
p. 5-4 - 5-5
Based on field visits by STO Design Group in June 2002, the reservoirs indicated moderate nutrient enrichment (STO Design Group, 2002). Ivanhoe water was very clear (due to chlorination and high flow-through rates). There was considerable benthic algae due to both light penetration over much of the reservoir bottom and nutrients in the influent water.

Light penetration to the bottom causes algae growth. This is why we need to know whether it's adequate to cite Hollywood and Encino reservoirs when predicting the result of ceased water treatment. A limnologist report of SLRC must be included in the EIR in order to properly assess water quality. Comparing SLRC to a 200' deep body of water (Hollywood Reservoir) is useless when trying to predict algae growth. 7-44

p. 5-5
The Los Angeles Regional Water Quality Control Board has prepared *Water Quality Control Plan Los Angeles Region: Basin Plan for Coastal Watersheds of Los Angeles and Ventura Counties (1994)*, known as the Basin Plan, to preserve and enhance water quality and protect the beneficial uses of all regional waters (California RWQCB, 1994). Beneficial uses are historical, existing, or potential uses of a body of water under the Federal Clean Water Act of 1972. Locally, the beneficial uses of a waterway or water body are determined by the RWQCB. In the Basin Plan, the RWQCB lists municipal drinking water supply as one of the beneficial uses for the Silver Lake Reservoir.

In this new DEIR, the language "among others" in reference to beneficial uses was deleted from the cited text of the Basin Plan regarding SLRC. What were the "other" beneficial uses of Silver Lake Reservoir listed in the Basin Plan? Does the Basin Plan mention that SLRC is part of the Ballona Watershed? It would be helpful if all references to Silver Lake Reservoir in the Basin Plan could be included in the DEIR? 7-45

p. 5-5 – p. 5-6
In addition, the plan notes that public access to the reservoir and its surrounding watershed is prohibited by LADWP. The Basin Plan is reviewed and updated as necessary. Last prepared and approved in 1994, the plan has been amended numerous times.

Since LADWP may allow future public access to the reservoir and surrounding watershed, it is time to update the Basin Plan, and see what the findings would be with public access taken into consideration? 7-46

5.2.3.2 Operation

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Responses to Letter #7

Response to Comment 7-42:

LADWP anticipates that it will take approximately 2 months to lower the water level and another 2 months to bring the level back up. The speed at which the water level can be lowered or raised is directly related to the integrity of the dam and reservoir.

Response to Comment 7-43:

LADWP does not have any plans to introduce fish habitat to the SLRC. Water used to maintain the water level in Silver Lake and Ivanhoe Reservoirs may contain chlorine or chloramines or be dechlorinated or dechloraminated.

If chloraminated water is added to maintain water levels within the reservoir, the ammonia contained in the chloraminated water will break down into more stable nitrogen containing compounds and will not continue to become more concentrated over many years.

Response to Comment 7-44:

Please see the response to Comment 7-19.

Response to Comment 7-45:

Additional references to Silver Lake Reservoir in the Basin Plan have been added. See Section 4.0 of this Final EIR for the additional text.

Response to Comment 7-46:

LADWP currently has no plans to allow public access to the reservoir or the reservoir complex.

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Surface Water
p. 5-9
Following the removal of the SLRC from the LADWP water distribution system, water contained in Ivanhoe and Silver Lake Reservoirs would be allowed to revert to a more natural state. This would be accomplished by discontinuing the addition of water treatment chemicals. LADWP expects that the water appearance in both reservoirs would generally change from a clear appearance to a less-transparent, green color that has characterized the Silver Lake Reservoir periodically over the years. This change in color would be due to increased algal growth because of sufficient existing nutrient concentrations.

The naturalization of the water will affect the appearance to such an extent that the community should be informed regarding the potential change to the viewshed. The mediation process for determining color should be stated. Add: LADWP will work with CPOR to determine the protocol for lake maintenance and will consult with an expert and the community regarding its long-term maintenance to ensure that an acceptable appearance can be sustained using a process that is compatible with potentially introduced marine life. 7-47

There is no mention of impact to the 85' spillway that connects Ivanhoe Reservoir to Silver Lake Reservoir. The water flowing over the spillway serves a purpose by providing visible vitality to the water in the reservoirs. Without a constant supply of water into Ivanhoe, one must assume that the water flow over the spillway will be discontinued, and the spillway will take on the appearance of a dry concrete ramp, and yet there is no mention of the loss of this critical visual resource. Currently, the spillway attracts many birds, including the Great Herons which nest in the Eucalyptus Grove less that 50 yards away from the spillway. These birds are observed daily near the moving water and it can only be assumed it's the movement of the water that has attracted them, since there are no fish. To cease the flow of the water is potentially a threat to the Great Heron habitat. 7-48 7-49

Additionally, the visual impact of the loss of flowing water, which is essentially a waterfall, is enormously significant and needs to be addressed. The fact that this DEIR has neglected to address this issue indicates that it is grossly incomplete. Mitigation must be considered to maintain the spillway waterfall and the present-day water levels. 7-50

The visual impact of the removal of the reservoirs from service are affected by the cessation of water treatment that will result in the change in color from crystal clear blue water to dark, murky, green water. The loss of the spillway flow will only add to the appearance of dead, abandoned reservoirs. Simply maintaining the water level is insufficient mitigation for the loss of view quality for the thousands of homes in the community and the hundreds of people who use the path around the reservoirs. 7-51

6.0 Biological Resources
6.2 Impacts
6.2.8.3.2 SLRC

p. 6-21 – 6-22
Other Nesting Birds. Construction activities in or adjacent to the naturalized area in the northeast portion of the SLRC may cause disturbance to special-status bird species nesting in the naturalized woodland, such as yellow-breasted chat, white-tailed kite, and Cooper's hawk. The presence of these species would be determined during preconstruction surveys of the SLRC site

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Responses to Letter #7

Response to Comment 7-47:

As described in the Draft EIR, LADWP has committed to working with CPOR on a Property Maintenance and Management Plan (PMMP) for the SLRC that would address water quality, water level, landscaping, facility maintenance, and vector/ pest control. Additional details of the PMMP are outside the scope of the Draft and Final EIR.

Response to Comment 7-48:

Water flowing over the spillway between Ivanhoe and Silver Lake Reservoirs may be discontinued as a result of the Proposed Project. Text changes to this effect have been included in Section 4.0 of this Final EIR.

To evaluate potential impacts resulting from discontinuing use of the spillway, various experts were consulted, including a wildlife biologist, a visual resources expert, and an architectural historian. Potential impacts related to discontinuing use of the spillway are addressed in these responses to comments and also in Section 4.0 of this Final EIR.

Water flows over the spillway from Ivanhoe Reservoir to Silver Lake Reservoir when the water level in Ivanhoe Reservoir exceeds 451 feet. This is not a required component of the water quality system to maintain water vitality. The spillway is considered to be a highly engineered and localized feature that is secondary to the importance of the views of large water surfaces of the reservoirs. Please see Section 4.0 of this Final EIR for additional information.

Response to Comment 7-49:

As discussed in the Draft EIR, nesting great blue heron is present at the SLRC in at least one nesting colony along the northwestern shore of Silver Lake. The colony is reported to have up to three nesting pairs. Because the water that flows into Ivanhoe Reservoir and consequently into Silver Lake Reservoir is potable and chlorinated, it does not support fish life. Consequently, the spillway does not provide a foraging or feeding source for great blue heron. While it is possible that the water movement attracts them, great blue heron do not require moving water in their habitat. Great blue heron would continue to have the benefit of protected open space and open water bodies in their habitat. Discontinuing the use of the spillway is not considered a significant impact to great blue heron habitat or the habitat of any other wildlife species at the SLRC.

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at this location, prior to ground-disturbing activities. If the species are present, then construction noise and dust could disrupt breeding activities. Impacts to breeding special-status birds would represent a significant adverse impact, requiring mitigation. Mitigation Measure BR-4 has been identified to reduce potential impacts to nesting birds to less-than-significant levels. No other special-status bird species are known to nest in the vicinity of construction activities associated with the Proposed Project at the SLRC.

Does this EIR exempt protection of species not specifically identified in the document? If so, then we must be sure the list is comprehensive. Red-tail Hawks, Great Horned Owls, and perhaps many others should be listed or open to protection through a blanket provision. The survey only took place in February and April. Are there any migratory fowl that were missed by these limited dates? 7-52

6.2.8.6.2 SLRC
p. 6-23
Some emergent vegetation may eventually become established at the SLRC. The emergent wetland would represent a new habitat type not currently present, and would attract additional species of waterfowl adapted to shallow marsh conditions, resulting in a net benefit to migratory waterfowl.

Is this emergent vegetation to locate on the concrete/asphalt banks? 7-53

6.3 Mitigation Measures

Mitigation Measure BR-5: Special-Status Mammals (Bats)
p. 6-26
Preconstruction surveys for bat roosts will be conducted at the HWSG site and the SLRC prior to ground-disturbing activities. Where active roosts are identified during these surveys, the following mitigation measures will be implemented:

1. Within 300 feet of the location of active roosts, ground disturbance and roost destruction would be avoided during the parturition period (March 15 through August 31).

2. Where this avoidance is not feasible, if potential roosts are identified prior to onset of parturition, roosts may be removed during the evening forage period (within 4 hours after dark) or fitted with one-way exit doors to effectively eliminate and exclude roost.

The word "avoided" needs to be defined or strengthened. Part 2 seems to suggest that roosts can be destroyed even during parturition. 7-54

The 85' Ivanhoe/Silver Lake spillway is an attraction to many birds, most notably the Great Herons that nest in the Eucalyptus Grove less than 50 yards away. The potential threat to the Great Heron habitat by ceasing flow of water over the spillway deserves attention. The fact that there is no mention of the spillway is an egregious omission. Since the Great Herons spend all of their time at the spillway, and there are no fish, one must conclude that they are attracted to the water movement. Without the flowing water, the spillway will be a dry, concrete ramp, and the Great Herons may choose to nest at the nearby Los Angeles River. The Herons are an important resource to the community and the impact of their loss is highly significant, and mitigation to maintain the water movement must be addressed herein. The flow of water over the spillway must be maintained. Consider providing a 7-55

Responses to Letter #7

Response to Comment 7-50:

The spillway is a 53-foot-wide rectangular concrete structure with an apron-style design on the Silver Lake side. The flowing water is not a waterfall, as there is no free-fall of water. The spillway is considered to be a highly engineered and localized feature that is secondary to the importance of the views of large water surfaces of the reservoirs. Discontinuing the use of the spillway is not considered to be a significant impact to visual resources, and the addition of discontinuing the use of the spillway to the project description does not change the findings or conclusions contained in the Draft EIR.

Response to Comment 7-51:

The visual impacts of removing the reservoirs from service are discussed in Chapter 14 of the Draft EIR.

Response to Comment 7-52:

This EIR does not exempt LADWP from complying with federal, state, or local laws for protection of wildlife.

Response to Comment 7-53:

Vegetation on the reservoir concrete/asphalt banks is not permitted per DSOD regulations. Please see Section 4.0 of this Final EIR for this text correction.

Response to Comment 7-54:

Mitigation Measure BR-5 is written such that bat roosts would either be avoided (during parturition) or removed or fitted with one-way exit doors outside of the parturition period.

Response to Comment 7-55:

Please see the response to Comment 7-49.

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pumping station as part of the water aeration process.

7.0 Cultural Resources

p.7-1
The Cultural Resources Assessment Report, contained in Appendix D, documents the results of the investigation and provides details in addition to the information provided in this chapter, including methodology, regional and site-specific prehistory and history, and photo documentation of historic resources.

The visual impact of the Ivanhoe dam spillway is not addressed. The spillway is a waterfall, a great visual landmark within the property, and an integral part of the culturally significant Ivanhoe Dam. Since the dam is a Historic Cultural Monument, any change to the appearance of the dam and the spillway must be considered. This DEIR neglects to mention that the spillway will be dry once the source water to Ivanhoe Reservoir will be cut off. The cessation of the flow of water will create a highly significant negative impact to the reservoir property and as a Historic Cultural Monument, such impacts need to be addressed accordingly or mitigation must be provided to maintain the flow of water over the spillway. 7-56

7.1.2 SLRC
7.1.2.1 Literature Review
Silver Lake and Ivanhoe Reservoirs

p. 7-4
Silver Lake and Ivanhoe Reservoirs were designated City HCM No. 422 in March 1989. The nomination refers specifically to only the reservoirs and dams, noting their importance in the growth of the City and to its water system, declaring that "Silver Lake is as much a landmark as any structure of mortar or stucco" (Kanner, 1989).

7.1.2.2 Field Investigation
7.1.2.2.1 Archaeological Resources

p. 7-4
The Proposed Project vicinity has experienced extensive ground disturbance from past and ongoing municipal and residential development, construction of underground utilities, and road infrastructure improvements. The SLRC is located on the United States Geological Survey (USGS) Hollywood Quadrangle 7.5' map. The reservoirs are enclosed by a perimeter fence and bordered on the west by West Silver Lake Drive, on the south-southeast by Silver Lake Boulevard, on the northeast by Armstrong Avenue, and on the north by Tesla Avenue. Three areas of archaeological concern identified in the SLRC area have been given the following designations for ease of discussion: SLRC-1, -2, and -3. Their locations are indicated in Figure 7-1.

Missing: Van Pelt Place is the southern boundary. 7-57

SLRC-1

p. 7-7
The only part of the SLRC-1 that is relatively undisturbed and is, therefore, potentially likely to have intact archaeological deposits is the base of the hill to the north (the "Knoll"). This area has been heavily disturbed in the historic period, and the modern surface seems to reflect extensive

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Response to Comment 7-56:

The spillway is not a waterfall; please see the response to Comment 7-50.

As discussed in Appendix D and Chapter 7 of the Draft EIR, Silver Lake and Ivanhoe Reservoirs were designated City HCM No. 422 in March 1989. The nomination refers specifically to only the reservoirs and dams. The two reservoirs were originally connected by a 36-inch cast-iron pipe beneath the fill of the separating dam; the open-channel spillway was added in 1944. Because the spillway would not be removed, only potentially unused, there would be no change to the structure or appearance of the dam. Therefore, discontinuing use of the spillway is not considered to be a significant impact to the cultural/historical significance of the reservoirs.

Response to Comment 7-57:

Comment noted and incorporated by reference into this EIR.

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filling and grading dating to the 1950s. This area was inspected by conventional pedestrian survey techniques, with transects spaced at approximately 20-meter intervals. Surface visibility was not high but was adequate, and no materials or sites of historic or archaeological significance were observed.

Nonetheless artifacts may be present and provisions must be made to protect or remove findings in an archival manner. 7-58

SLRC-2
p. 7-7
This open grassy area adjacent to, but outside, the reservoir perimeter fence, at the corner of West Silver Lake Drive, near the southwest corner of the reservoir itself, is the location of the proposed regulating station. It has been extensively landscaped and modified by mechanical means in the recent past.

The survey did not probe to the depths of the proposed regulating construction. Subsurface artifacts may be present and provision must be made to protect or remove findings in an archival manner. 7-59

Silver Lake South Outlet Chlorination Station
p. 7-8
The structure is stylistically similar to many of the water system-related utilitarian facilities constructed by the LADWP during the 1910s through the 1940s. It is currently used by LADWP for storage.

Will the items stored in the building be removed if the community finds new uses for the structure? LADWP must commit to work with the community should there be restoration to preserve its historic integrity. 7-60

Silver Lake Meter House
p. 7-9
The chlorination station and meter house lot are enclosed by a low, chain-link fence and landscaped with ficus trees and topiary, ivy ground cover, yucca, and neatly trimmed holly shrubs.

Per LADWP response letter dated 12/1/2004, subjective words like "neatly" are to be removed from the DEIR. The use of the word "neatly" is similar to the word "attractively" which was deleted from the DEIR during the initial phase because it created a bias toward the upkeep of the property, which is far from well maintained. There is actually quit a bit of graffiti on the building. 7-61

Silver Lake Chemical/Chlorine Plant
p. 7-9
Currently, the chlorine plant is used for equipment storage. The plant stands within the grounds of the reservoir complex amid landscaped lawn, trees, and bushes. Chain-link boundary fencing extends from either end of the façade of the building. Referred to as a "Chemical Plant" on architectural drawings and a "Chlorine Plant" on other maps, the building is believed to have been erected around the time that the Silver Lake and Ivanhoe Reservoirs went into use for domestic water supply (1920). Plans dating to 1927 depict the building much as it currently appears, but with a glazed and paneled front door and 12-light sash windows. The structure was functionally replaced in 1947 by the chlorination station at the west end of the dam. It is currently used for

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Responses to Letter #7

Response to Comment 7-58:

The potential for finding artifacts is addressed in Chapter 7, Cultural Resources, of the Draft EIR and recovery and treatment of archaeological resources encountered during construction is addressed in Mitigation Measure CR-1: Archaeological Resources.

Response to Comment 7-59:

Please see the response to Comment 7-58.

Response to Comment 7-60:

LADWP does not have any plans to relinquish ownership or management of the chlorination station.

Response to Comment 7-61:

LADWP made a good-faith effort to ensure that subjective words were not used in the Draft EIR. Please see Section 4.0 of this Final EIR for revised text that removes the word "neatly".

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storage.

When will the items stored in the building be removed? See above. If restoration of the building is to occur, will there be access to the original plans? 7-62

Stone Retaining Walls
p. 7-12
East of Ivanhoe Reservoir, adjacent to the east, uphill, side of the primary reservoir access road, and also along both sides of driveways extending from Armstrong Avenue to the perimeter road are low stone retaining walls. Typically between two and three feet in height, the walls are of mortared random rubble construction, incorporating both rough dressed stone and natural cobbles. In one location, opposite the landscape building, a three-riser stone stair is cut into the wall. The stone retaining walls are thought to be early features of the reservoir complex, dating to the 1906-1940 period.

The stonewalls are probably constructed from Los Angeles River rock and should be preserved wherever possible as they help link the property to the river which is less than 0.5 miles away. 7-63

Trees and Other Landscape Features
p. 7-12
Some alterations to the original landscaping were necessitated by the various reservoir improvement projects beginning in the 1930s and continuing through the present day.

What present day improvement projects? The LADWP response letter dated 12/1/2004 states that the use of the language "continuing through the present day" does not imply present day improvements. There is room for confusion and the language should be altered if implication is not desired. Other than a sidewalk on WSLD paid for by state and city funds with the cooperation and help of LADWP, the most recent improvement project at SLRC was in 1993 when a by-pass line was installed on the bottom of Ivanhoe Reservoir and the banks were resurfaced as mitigation for the draining of that water. The remainder of the property was in severe disrepair at that time, and is much the same today. 7-64

p. 7-12
Currently, the reservoir complex incorporates numerous mature trees of both native and introduced species, including live oak, eucalyptus, California sycamore, various species of pines, cedars, and palms, bottlebrush, olive, pepper, and magnolia. Additionally, the well-maintained, park-like setting is enhanced by areas of shrubs and bushes interspersed within expanses of open lawn and low vegetation such as the "meadow."

There is no mention of the historic Aleppo Pines that have been neglected and are dying off. Most of the trees on the property display signs of neglect and require the attention of an arborist. 7-65

7.2 Impacts

7.2.3 SLRC
7.2.3.1 Construction
SLRC-1

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Responses to Letter #7

Response to Comment 7-62:

Please see the response to Comment 7-60.

Response to Comment 7-63:

LADWP does not have any plans to remove the stone retaining walls.

Response to Comment 7-64:

Please see Section 4.0 of this Final EIR for revised text regarding "present day improvements".

Response to Comment 7-65:

The Aleppo Pines would not be affected by the Proposed Project and as such are not addressed in the Draft EIR.

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According to Figure 7-1, SLRC-1 incorporates the meadow only, and therefore no other areas on the east side of SLRC are covered. Yet there are many structures dating from the early part of the 20th century that are uniquely representative or typical of LADWP workings at that time. What is to be the fate of these structures? What is their current condition? 7-66

7.2.3.2 Operation
p. 7-16
No adverse impacts to cultural resources are expected during operation of the bypass Pipeline regulating station, and relief stations or by the change in function of Silver Lake and Ivanhoe Reservoirs, provided that the SLRC is maintained consistently with the appearance and condition that LADWP has provided at this facility for several years.

It should be noted that the property has been neglected for several years and certain elements are badly in need of repair. To maintain the present appearance and condition is to be a negligent landlord maintaining a property well below the standard of the surrounding area. 7-67

7.3 Mitigation
7.3.1 Construction
Mitigation Measure CR-1: Archaeological Resources
p. 7-17
• The selected archaeologist shall be required to secure a written agreement with a recognized museum repository regarding the final disposition and permanent storage and maintenance of any unique archaeological resources recovered as a result of the archaeological monitoring. This would also include corresponding geographic site data that might be recovered as a result of the specified monitoring program. The written agreement for the disposition of recovered artifacts shall specify the level of treatment (preparation, identification, curation, cataloging) required before the collection would be accepted for storage.

The community requests that archeological findings be returned to SLRC for potential future display on-site unless existing law requires other dispensation. 7-68

Mitigation Measure CR-2: Historic Landscaping Restoration
p. 7-17
Where avoidance or transplantation of onsite trees and other vegetation is not possible, the proposed regulating station area (SLRC-2) should be landscaped with mature, healthy trees and plant material of comparable species, in keeping with the historic character and appearance of these portions of the reservoir complex.

Replacement trees or vegetation must be an age or size determined on the basis of optimal appearance and health. It may be preferred to replace any vegetation removed with native species. 7-69

8.0 Paleontologic Resources
8.3 Mitigation Measures
Mitigation Measure PR-1: Paleontologic Resources at HWSG Site and SLRC
• Recovered fossil remains will be prepared to the point of identification, identified by knowledgeable paleontologists, curated, catalogued with LACMVP fossil specimen andlocality

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Responses to Letter #7

Response to Comment 7-66:

LADWP does not currently have plans for other structures at the SLRC.

Response to Comment 7-67:

Comment noted; LADWP disagrees with this assessment.

Response to Comment 7-68:

Archaeological findings are typically held and displayed by a recognized museum repository. However, in the future event that part of the SLRC is open to the public and there is an appropriate venue at the SLRC for display of archaeological resources, LADWP will work with the community and City to determine whether archaeological resources found at the SLRC can be appropriately displayed.

Response to Comment 7-69:

LADWP would work within the constraints of Proposed Project facilities and the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Cultural Landscapes* in consultation with a landscape architect to determine appropriate replacement trees or vegetation

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numbers, and transferred to the LACMVP for permanent storage.

The community requests that archeological findings be returned to SLRC for potential future display on-site unless existing law requires other dispensation. 7-70

9.0 Traffic and Transportation

p. 9-1
SLRC Study Area
1. Silver Lake Boulevard and Van Pelt Place
2. Glendale Boulevard and State Route 2 southbound off-ramp/Waterloo Street/ Fargo Street
3. Glendale Boulevard and Silver Lake Boulevard
4. Glendale Boulevard and Fletcher Drive/Silver Ridge Avenue
5. Fletcher Drive and Riverside Drive

9.1.1.2 SLRC
p. 9-5
The major streets that serve the potential SLRC site are Glendale Boulevard, Fletcher Drive, Silver Lake Boulevard, and Hyperion Avenue in the north-south direction; and Riverside Drive, Van Pelt Place, and Rowena Avenue in the east-west direction. The following is a brief description of the streets that serve the site.

This study only covers major streets, but there is already a problem identified in the neighborhood and under study by LADOT by request of CD 13 City Council office covering minor neighborhood streets connecting the Rt. 2 Freeway with SLBL. These streets include Waterloo and Duane Streets. LADWP agreed in preliminary discussions to include these streets in this survey but no additions were made to this chapter involving these streets. 7-71

p. 9-8
Fletcher Drive - Fletcher Drive is a major north-south arterial. It provides two lanes in the northbound direction and two lanes in the southbound direction. It provides local access and regional access through connections to SR 2. Parking is not allowed on either side of the street within the study area, and the posted speed limit is 35 mph.

Fletcher also provides access to the I-5 Northbound which is the key route to the Spreading Grounds. It also contains bike lanes and crosses the LA River. There is also a bike lane present. 7-72

p. 9-8
Silver Lake Boulevard - Silver Lake Boulevard is a major north-south arterial. It provides one travel lane in each direction. Silver Lake bends and travels in an east-west direction while connecting to Glendale Boulevard. Silver Lake Boulevard provides direct access to the project site. Parking is limited on to the east side of the street within the study area, and the posted speed limit is 35 mph.

SLBL is a Scenic By-Way and contains bike lanes. It is a major connector to SR-101, Sunset Blvd. and Beverly Blvd. Since the study area should include the construction area the study area needs to be extended as far southwest as London St. There is limited parking on both sides of the street on this densely populated thoroughfare. In some parts parking is controlled by permit. 7-73

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Responses to Letter #7

Response to Comment 7-70:

Please see response to Comment 7-68.

Response to Comment 7-71:

Waterloo and Duane Streets are not anticipated to be used for either construction truck or worker traffic.

Response to Comment 7-72:

Comment noted and incorporated by reference into the EIR.

Response to Comment 7-73:

The Traffic and Transportation Chapter of the Draft EIR addresses Silver Lake Boulevard and potential impacts to the street system as far south as London Street (potential impacts related to construction of a relief station on London Street are discussed on page 9-60 of the Draft EIR).

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p. 9-8
Van Pelt Place - Van Pelt Place is an east-west roadway. It minimally provides one travel lane in each direction. Van Pelt Place provides direct access to the SLRC site. Parking is allowed on both sides of the street within the study area, and the posted speed limit is 25 miles per hour

Since Van Pelt Place is only 30' wide, it does NOT provide one travel lane in each direction if one of the vehicles is a truck or an SUV. This document should state that two-way traffic in nearly impossible. See photo below: 7-74

Van Pelt Place

p. 9-8
Rowena Avenue - Rowena Avenue is a secondary east-west arterial. It provides two travel lanes in the eastbound direction and two lanes in the westbound direction. Rowena Avenue provides local access to the SLRC site. Parking is allowed on both sides of the street within the study area, and the posted speed limit is 35 mph.

Rowena is the major connector for the residents surrounding SLRC to the grocery stores and other services on Hyperion Ave. It also has a fire station at the intersection of Glendale Blvd. 7-75

p. 9-8
Hyperion Avenue - Hyperion Avenue is a secondary north-south arterial. It provides two travel lanes in the northbound direction and two lanes in the southbound direction. Hyperion Avenue provides local access to the SLRC site. Parking is allowed on both sides of the street within the study area, and the posted speed limit is 35 mph.

Is the word "secondary" an official designation or is it an opinion? It connects the City of Glendale and traffic from Rowena Ave. to Sunset Blvd. It is also the commercial district 7-76

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Responses to Letter #7

Response to Comment 7-74:

The Draft EIR, on page 9-8, states that Van Pelt Place is an east-west roadway that minimally provides one travel lane in each direction.

Response to Comment 7-75:

Comment noted and incorporated by reference into the EIR.

Response to Comment 7-76:

"Secondary" street is an official designation as defined in the City of Los Angeles General Plan Transportation Element.

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used by all of the residents surrounding SLRC, and traffic is gridlocked every night.

9.1.2 Existing Traffic Volumes and Levels of Service

p. 9-9 Table 9-2 Existing Surface Street Characteristics – SLRC Site

Silver Lake Blvd.	Glendale Blvd.	Armstrong Ave.	1	1	DY	PA	PA	35
	Armstrong Ave.	Duane St.	1	1	DY	PA	NSAT	35
	Duane St.	Van Pelt Pl.	1	1	2LT	PA	NSAT	35
	Van Pelt Pl.	Swan Pl.	1	1	DY	PA	NP 11P-6A ex by permit	35
	Swan Pl.	Effie St.	1	1	DY	PA	PA	35
	Effie St.	Berkeley Ave.	1	1	DY	2hr 8A-6P	PA	35
	Berkeley Ave.	Reservoir St.	1	1	2LT	PA	PA	35
	Reservoir St.	Parkman Ave.	1	1	DY	PA	PA	35
	Parkman Ave.	Bellevue Ave.	2	2	DY	PA	PA	35
	Bellevue Ave.	London St.	2	2	DY	PA	NSAT	35
	London St.	Smilax St.	2	2	RM	NSAT	NSAT	35
	Smilax St.	Virgil Ave.	2	2	DY	NSAT	NSAT	35

There is no mention of the SR-101 on and off ramps between London St. and Smilax St., which is odd because there is a raised median, but not for the entire distance. SR-101 is a major intersection. For the Fletcher Dr. segment, there is no mention of the on/off ramp for SR-2 either. 7-77

9.1.2.2 Existing Level of Service

p. 9-15
Figure 9-3 Existing Peak Traffic Volumes at SLRC

Figure 9-3 indicates that 300 cars per peak AM hour enter Duane St. via Waterloo St. to access SLBL. An LADOT study in August 2005 states that there are actually 358 cars per hour. Duane Street is a narrow residential street on an extremely steep hill with a speed limit of 15 MPH posted at the top. It is a heavily used short cut for commuters. There is a 90 second red light at the intersection of Duane and SLBL. The green light is 45 seconds. The LADWP response letter dated 12/1/2004 states that CH2M-Hill will review and add information about Duane St. if warranted. Was the review made and unwarranted, or was the request ignored? Unless the EIR will state that no construction vehicles will use Duane or Waterloo Street to access the site from SR 2, a traffic review of those streets must be conducted or this EIR is incomplete. 7-78

9.1.3 Existing Transit Service
p. 9-17
Five bus lines operated by the Los Angeles County Metropolitan Transportation Authority (LACMTA) currently serve the two project sites. These transit lines are described below.

The Silver Lake community is currently #22 on a waiting list that fluctuates between 20 and 22 positions to have a DASH route assigned to the area. The community requests that LADWP work with City of Los Angeles to have the DASH route installed to mitigate the additional traffic that will be generated by their projects in the area. 7-79

9.2.1.1.2 Cumulative Project Traffic Generation and Assignment
p. 9-19

Responses to Letter #7

Response to Comment 7-77:

The SR-101 on and off ramps between London Street and Smilax Street were not discussed because it is not anticipated that they would be affected by the Proposed Project.

Response to Comment 7-78:

The potential effect of the Proposed Project on Duane and Waterloo Streets was considered for the Draft EIR. It was determined that these streets did not need to be included in the detailed analysis because construction traffic would not use these streets.

Response to Comment 7-79:

LADWP will work with the City of Los Angeles to consider adding an additional DASH route in the Silver Lake area.

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As indicated, the second major source of traffic growth in the study area is expected from other future development projects in the area. These related projects or "cumulative projects" are those planned developments expected to be completed within the same timeframe as the Proposed Project construction plan. Data describing cumulative projects in the area were obtained from LADOT. In addition, cumulative projects within the City of Glendale and Burbank were obtained from recent traffic studies completed within the HWSG study area. Seventeen cumulative projects were identified within the study areas, and their locations are shown in Figure 9-6.

Figure 9-6 tells us nothing about the nature of the projects. Missing here is a list of the projects, and a description of the project with a list of the impacts. The Lower Reach RCS RP DEIR, released almost simultaneously with this DEIR neglects to mention the SLRC construction site of this project. Chapter 16 lists numerous projects in the Silver Lake area, yet Table 9-7 cites only two projects: a restaurant remodel, and a new school over a mile away. Where is the discussion of the 567 days of street construction for the RSC RP, and the three phases of the Trunk Line project on three major traffic corridors in Silver Lake, the cement-line project on Glendale Blvd. and many other surrounding streets, These are all LADWP projects so CH2M-Hill didn't need to go to LADOT to get the information. The study should also include the planned realignment of the Rt. 2 freeway on/off ramps, the Glendale/Hyperion Bridge retrofit, the new LACC campus at Fletcher Dr. and San Fernando Rd., the widening of the intersection at Fletcher and San Fernando Rd., the new LAPL Branch Library at SLBL and Glendale Blvd., the Los Angeles River Development Project (Fletcher node), the Taylor Yard State Park, and High School, and the Northeast Interceptor Phase II Sewer. The many projects referenced in Chapter 16 should be included in the figures and tables of the chapter regarding traffic impacts. 7-80

9.2.1.2.1 Project Traffic Generation

p. 9-23
Figure 9-5 Existing Plus Ambient Growth Peak Hour Traffic Volumes (SLRC Site)

Figure 9-5 indicates that this DEIR does not recommend prohibiting construction traffic from using the Waterloo/Duane St. cut through. They have added 5 vehicles per hour to a situation that has already been determined to be a problem by the LADOT and the CD 13 City Council office. Since the Rt. 2 Freeway connects the SLRC with the city dump at Eagle Rock, the potential for these added vehicles being large trucks is high. 7-81

p. 9-25
Figure 9-6 Related Projects Location

See comment above regarding Figure 6. 7-82

p. 9-29
Figure 9-8 Related Projects Only Peak Hour Traffic Volumes (SLRC Site)

I'm not sure how rounding to the nearest 5 vehicles excluded Waterloo and Fargo Streets from Figure 9-8, but using that method classifies 300 cars per hour as insignificant, even on a small, extremely steep, residential street with a 15 MPH speed limit due to the danger at the crest of the hill. This study is incomplete. 7-83

p. 9-33
Figure 9-10 Year 2013 Cumulative Base Peak Hour Traffic Volumes (SLRC Site)

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Response to Comment 7-80:

The projects identified in Draft EIR Figure 9-6 (Related Projects Location) are described in Table 9-7 (Related Projects Trip Generation Estimates). Figure 9-6 and Table 9-7 describe projects in the area that have been identified as contributing to permanent traffic growth in the project vicinity, but do not describe those projects evaluated for potential cumulative impacts. The projects identified by the commenter are described in Chapter 16 of the Draft EIR and in Master Response C in Section 3.0 of this Final EIR.

Response to Comment 7-81:

Figure 9-5 of the Draft EIR illustrates existing plus ambient growth peak hour traffic volumes at the SLRC. Figure 9-5 does not include any traffic volumes related to the Proposed Project.

Response to Comment 7-82:

Please see the response to comment 7-80.

Response to Comment 7-83:

Figure 9-8 does not illustrate anticipated Proposed Project traffic volumes. Figure 9-8 illustrates the additional permanent traffic volumes anticipated to be added during the peak hour from the cumulative projects identified in Figure 9-6 and Table 9-7.

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See above comments regarding Duane St. Also in question is the estimated growth projection rate. 7-84

p. 9-35
Table 9-7 Related Projects Trip-Generation Estimates

1	Restaurant and Bar [a]	Restaurant & bar w/ live entertainment	Los Angeles	Rowena Ave. and Rokeby St.	5.055 KSF	455	4	38
2	Belmont New Primary Center No. 12 [a]	New Primary school to accommodate max. daily enrollment of 380 students w/36 parking spaces	Los Angeles	Lake St and Beverly Blvd.	380 students	340	70	0

If this table is to exist, it should have complete information. See comment above regarding Figure 9-6. 7-85

9.2.2.1 Significant Traffic Impact Criteria
Figure 9-14
SLRC SRP Draft EIR
Trip Distribution - Trucks
(SLRC Site)

Figure 9-14 shows 100% of all trucks exiting Rt. 2 turning right on Glendale Blvd. to get to SLBL. This is not the most convenient route, nor is it the fastest which is why Mapquest.com lists the Waterloo/Duane St. route on their website, and why a minimum of 300 commuters an hour use it every morning. It must be mandatory in the Final EIR that all construction trucks are forbidden from using this neighborhood shortcut. 7-86

Figure 9-16
SLRC SRP Draft EIR
Project Only Peak Hour Traffic
Volumes (SLRC Site)
Source: Kaku Associates (2004) and revised by CH2MHILL (April 2005)

Figure 9-16 was revised downward by CH2M-Hill from 5(10) to 0(5) AM(PM) trips over the Waterloo/Duane St. shortcut. What is the justification for this revision of their consultants' figures? If DWP ratepayers are covering CH2M-Hill's consultant fees, it seems that they should be require to accept the resulting data. 7-87

Figure 9-18 (2005)
SLRC SRP Draft EIR
Year 2013 Cumulative Plus Project Peak
Hour Traffic Volumes (SLRC Site

Figure 9-18 shows the projected 2013 Rt.2/Glendale Blvd./Waterloo St. intersection as part of their study. It makes no sense to include that intersection in the study without including the Duane St/SLBL intersection as well, since the majority of the traffic exiting Rt. 2 use Duane St. to access SLBL. In the AM, Waterloo and Fargo together receive 358 cars/hour off Rt. 2. All of these cars end up at the intersection of Duane St./SLBL. Duane St. is a very small, extremely steep residential street and the cars are usually backed up at least 300' from the intersection. 7-88

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Responses to Letter #7

Response to Comment 7-84:

Figure 9-10 illustrates year 2013 cumulative peak hour traffic volumes in the vicinity of the SLRC. Figure 9-10 does not include anticipated Proposed Project traffic volumes.

Response to Comment 7-85:

Please see the response to comment 7-80.

Response to Comment 7-86:

Construction traffic will be required to use routes identified by the LADOT in their Transportation Management Plan for the Proposed Project.

Response to Comment 7-87:

The comment is unclear. The figures presented in the Draft EIR are considered to be an accurate reflection of anticipated project impacts.

Response to Comment 7-88:

The intersection of Glendale Boulevard and State Route 2 southbound off-ramp/Waterloo Street/Fargo Street was one of 10 intersections identified by LADOT to be analyzed as part of the SLRC SRP. However, construction traffic is not anticipated to use Duane Street to access the SLRC.

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9.2.2.3.2 On-Street Impacts
SLRC
p. 9-60
Relief Station Construction
Two relief stations would be constructed within streets in the project area. The first relief station would be located on Silver Lake Boulevard, to the northeast of the Y-intersection with West Silver Lake Drive, just north of Effie Street. For most of the construction period, one lane of traffic in each direction would be maintained on Silver Lake Boulevard. During vault construction, however, Silver Lake Boulevard would be closed; and traffic would be detoured (via West Silver Lake Drive or North Occidental Boulevard).

How long does vault construction take? This is a major commuter route and a closure of this magnitude needs to be addressed thoroughly. This mention was hard to find and is extremely vague. 7-89

The use of N. Occidental as a detour route will propose problems due to the fact that it allows only one lane of traffic, total. Commuters need to be notified that the route will be reduced and a detour will be in effect. 7-90

p. 9-60
With implementation of Mitigation Measure TT-3, the traffic impacts from relief station construction would be less than significant.

How can they possibly suggest that closing a major commuter route for up to seven weeks and rerouting the traffic onto a sub-standard single-lane street would reduce the impact to less than significant? 7-91

9.2.2.3.3 Neighborhood Traffic Impacts
SLRC
p. 9-61
Trucks entering and leaving the site, however, would be directed to avoid unnecessary use of the residential streets. Truck routes would be designated as part of the traffic control plan that should be submitted to LADOT for its approval.

The use of the word "avoid" is too soft. The language must specify that trucks be forbidden from using the residential streets if not necessary. 7-92

p. 9-61
The additional 70 daily trips made by the 35 construction workers are likely to access the site through major roadways such as Silver Lake Boulevard and Glendale Boulevard, as shown in the trip distribution in Figure 9-13. Assuming a portion of the 70 daily trips would use one of the residential streets, the additional traffic is insignificant considering the number of trips is small. Based on the maximum trip-generation estimates at the SLRC site, the Proposed Project-related increase in daily traffic in any of the residential streets is not expected to exceed any of the neighborhood intrusion impact criteria identified above. Therefore, the potential impact at the surrounding neighborhood streets would also be insignificant at the SLRC site.

The above conclusion is based on there not being any substantial cumulative projects in the area. But there are cumulative projects as identified above, which will put the community streets at a standstill for many years. 7-93

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Response to Comment 7-89:

Relief station construction is described in Draft EIR Section 2.2.3.2, Regulating Station and Relief Stations. Construction of the first relief station would take approximately 6-7 weeks; construction of the second relief station would take approximately 11 weeks. Additional information about the project construction schedule can be found in Master Response E in Section 3.0 of this Final EIR.

Response to Comment 7-90:

Comment noted. As described in Mitigation Measure TT-3, a Transportation Management Plan would be developed in conjunction with LADOT to address any detour routes.

Response to Comment 7-91:

LADWP believes Mitigation Measure TT-3, Transportation Management Plan (TMP), will successfully ensure that temporary traffic impacts from relief station construction are less than significant. The TMP will be prepared in coordination with the Los Angeles Department of Transportation (LADOT), who will be responsible for the selection of any necessary detour routes.

Response to Comment 7-92:

Construction traffic will be directed to not use residential streets if not necessary.

Response to Comment 7-93:

The analysis contained in Draft EIR Chapter 9 is based on permanent future traffic levels plus the Proposed Project. An analysis of cumulative impacts is contained in Draft EIR Chapter 16, and additional cumulative impacts analysis is contained in Master Response C in Section 3.0 of this Final EIR.

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9.2.2.5 Regional Congestion Management Plan Analysis
p. 9-61
Similarly, based on the incremental Proposed Project trip-generation estimates presented previously, the Proposed Project will not add more than the threshold of 150 new trips per hour to the CMP monitoring station at Stadium Way or any other freeway segment. Therefore, no further analysis is required at this CMP freeway monitoring station.

The above conclusion is based on there not being any substantial cumulative projects in the area. But there are cumulative projects as identified above, which will put the community streets at a standstill for many years. 7-94

9.3.1.2 SLRC
Mitigation Measure TT-2: Silver Lake Boulevard and Van Pelt Place
p. 9-62
Truck deliveries for materials or equipment will be scheduled so that none of the truck trips would arrive or depart the SLRC during the afternoon peak period between 4:00 p.m. and 6:00 p.m. Any truck deliveries will occur before the afternoon peak period.

Morning peak hour traffic is the same as in the evening, yet there is no mitigation for the mornings? Peak hours are not limited to 4:00 PM – 6:00 PM. 7-95

TT-3: Transportation Management Plan (TMP)
p. 9-62
A Transportation Management Plan (TMP) would be developed to mitigate the traffic and roadway impacts of the construction activities on the project and surrounding area. The TMP would be prepared in coordination with LADOT and would address the following, as appropriate:

The newest draft of this DEIR has deleted the requirement of providing "truck haul routes" which means that trucks could potentially be clogging our residential streets. These needed to be added back in. 7-96

p. 9-63
• General access restrictions associated with the Proposed Project, including proper notification of affected residences, businesses, and other facilities prior to construction. Advance public notification will include posting of notices and appropriate signage of construction activity. The TMP must ensure adequate access to residences and facilities via existing roadway intersections and private driveways at all times or include alternate access, detours, or temporary mitigation to address access restrictions adequately.
• Emergency access restrictions associated with the Proposed Project, including proper notification of emergency providers and provision of alternate routes, if necessary. All construction activities will be coordinated with local law enforcement, fire protection, and other emergency service providers. These entities will be notified of the timing, location, and duration of construction activities.

As designated community representative on this project (CSSLR) would also need to receive the same notices. 7-97

p. 9-64
SLRC - Silver Lake Boulevard/Van Pelt Place
The construction traffic volumes associated with the overlapping activities (between October 2007 and May 2008) result in significant traffic impacts even after implementation of the proposed

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Response to Comment 7-94:

Please see the response to Comment 7-93.

Response to Comment 7-95:

Table 9-11 in the Draft EIR shows that the potential for a significant impact at the intersection of Silver Lake Boulevard and Van Pelt Place during the AM or PM peak hour was analyzed using Highway Capacity Manual stop-controlled methodology (for the purpose of evaluating the operating condition of the intersection) and Critical Movement Analysis (CMA) methodology (for the purpose of application of City of Los Angeles significance criteria). As shown in Table 9-11, it is anticipated that the Proposed Project would result in a significant impact at the intersection of Silver Lake Boulevard and Van Pelt Place during the PM peak hour, but not during the AM peak hour. Therefore, mitigation was required for the PM peak hour, but not for the AM peak hour.

Response to Comment 7-96:

Truck haul routes would be addressed in the Transportation Management Plan for the Proposed Project that would be prepared by LADOT in conjunction with LADWP.

Response to Comment 7-97:

A CSSLR representative would receive the general access restriction notifications associated with the Proposed Project.

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Mitigation Measures. However, because the construction duration is shortterm and would only affect the traffic from Van Pelt Boulevard (i.e., through traffic is not affected), most of the impacts would affect construction-related traffic only.

The cumulative projects must be considered before describing the length of construction as "short-term". Why is there no concern regarding intersections at Hyperion/Rowena, Glendale/Riverside and Fletcher/Riverside, when these routes are already congested without any project? 7-98

10.0 Noise
10.2.3 SLRC
10.2.3.1 Construction
Trucking
p. 10-18
Figure 10-5: Noise Level Increase on Silver Lake Boulevard Due to Trucking
Appendix G Tables 16 and 17 show the projected daily volume of truck traffic required to support construction activities at the SLRC. Average hourly truck volumes were obtained by combining truck volumes for all operations and dividing by 10 work hours per day. Average hourly truck volumes would not exceed two truck trips per hour, resulting in a negligible noise increase according to Figure 10-5.

How many truck trips would there be if the cumulative projects were included in this chapter of the DEIR? Would the noise level threshold constitute significant impact? 7-99

10.2.3.2 Operation and Maintenance
p. 10-20
To maintain levels on this order, the regulating station should produce no more than 40 dBA at the nearest residence (resulting in a total noise level of 45 dBA). This would require a reduction in noise emissions of nearly 20 dBs from the current estimate. Mitigation Measure N-3 has been identified to ensure that the regulating station would produce noise levels no more than 40 dBA at the nearest residence.

p. 10-21
Figure 10-8
Regulating Station Operation

The target acceptable operational noise level for the Regulator Station is 40 dBA at the nearest residence; yet figure 10-8 only shows a radius to 60 dBA. How many residences are within the unacceptable permanent noise level area between 40dBA and 60 dBA, and why is this radius not included in the study? If one uses Figure 10-7 which shows a noise level of 80 dBA dropping to 70 dBA after approx. 600 feet in the identical contours, then all of the residences within 1350 feet of the operational Regulator Station will potentially be experiencing permanent ambient sound above acceptable values. 7-100

11.0 Air Quality
11.2.2.3 Combined Construction Emissions at the HWSG Site and SRLC
p. 11-14
Where construction phases overlap, the calculations have been combined regardless of the physical location of the construction activities. When two or more phases of the project overlap (even for days or weeks), the highest emitting days of each individual phases were combined to

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Response to Comment 7-98:

Please see the response to Comment 7-93.

Response to Comment 7-99:

Cumulative impacts are described in Chapter 16 of the Draft EIR and in Master Response C in Section 3.0 of this Final EIR.

Response to Comment 7-100:

Once LADWP determined that any residence in the vicinity of the regulating station would potentially be exposed to a noise level greater than 40 dBA and that mitigation to reduce operational noise would be required, it was not considered necessary to include a figure depicting additional noise level contours. Instead, LADWP created Mitigation Measure N-3 to ensure that the regulating station will produce noise levels no more than 40 dBA at the nearest residence and therefore no residences will experience significant noise impacts.

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estimate the most conservative, worst-case emissions for that time period. Those estimates were then compared to the SCAQMD CEQA significance for construction on both a daily and quarterly basis. Tables 11-13 and 11-14 show maximum daily and quarterly construction emissions for the combined phases. Table 11-13 shows that, even after mitigation, maximum daily emissions exceed significance thresholds for ROG, CO, NOX, and PM10. Table 11-14 shows that, after mitigation, maximum quarterly emissions exceed significance thresholds for ROG, NOX, and PM10.

There is no survey of cumulative projects, and the result of ensuing traffic. How much further excessively significant will it be then, if all of the other overlapping projects and the ensuing commuter jams are taken into account? 7-101

11.4 Significance After Mitigation

p. 11-19
Construction-related emissions are expected to be significant even with the implementation of fugitive dust control measures and Mitigation Measure AQ-1. Construction-related emissions for this project were quantified using the worst-case, most conservative assumptions. For example, it is assumed that all equipment needed for a particular construction phase will be operating all day at its rated load capacity. Also, where any of the phases overlap (even for a few weeks) those overlapping emissions were used to determine significance. The SCAQMD threshold levels for significance during construction are very conservative, and generally even minor construction projects exceed the allowable emission levels.

What is the mitigation for several years of unacceptable air quality? 7-102

12.0 Public Services and Utilities

12.2.3.1 Construction
Community Facilities
p. 12-4
Construction of the proposed facilities at the SLRC would not require additional facilities or staffing of existing community facilities nor would it diminish the level of service for existing community facilities.

The above statement does not take into account that the parking situation on Van Pelt Place is already severely limited, and that one side of the street will have to become a "No Parking Zone" if the trucks are to pass. The park will as a result become inaccessible for many residents. Please see Land Use – Chapter 3 for the problems associated with any temporary loss of park space. 7-103

12.3 Mitigation Measures

p. 12-5
No adverse impacts to public services and utilities are anticipated as a result of construction and operation of the Proposed Project. As such, no mitigation measures are required.

What is the mitigation for the loss of parking spaces and accessible park space for 7 years? Since the trucks won't be allowed to use Van Pelt Place after 4:00 PM, the street parking must be made available at that time. Also note that the Silver Lake Recreation Center is a designated voting place for a minimum of three precincts, so parking must be made available on both sides of the street on any given election day. 7-104

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Response to Comment 7-101:

Cumulative Impacts are described in Chapter 16 of the Draft EIR and in Master Response C in Section 3.0 of this Final EIR.

Response to Comment 7-102:

Air quality impacts and mitigation are described in Chapters 11 and 16 of the Draft EIR.

Response to Comment 7-103:

LADWP disagrees with this assessment. Please note that LADWP would not unnecessarily restrict parking during construction when space is not required. See Section 4.0 of this Final EIR for text changes to this effect.

Response to Comment 7-104:

LADWP would not unnecessarily restrict parking during construction when space is not required. LADWP will coordinate with designated polling places to avoid traffic conflicts with voters related to Proposed Project construction.

Please see Section 4.0 for text changes that address these issues.

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13.0 Hazardous Materials

13.2.3.2 Operation

p. 13-4
During operation of the bypass pipeline, regulating station, and relief stations at the SLRC, hazardous materials would not be used or stored onsite. Currently, chlorine is stored onsite and used for water treatment. When Ivanhoe and Silver Lake Reservoirs are removed from the distribution system, chlorine would no longer be stored at the SLRC.

Is naturalization of the water a foregone conclusion? What if the community wants the water to remain clear? What are the risks involved with the chemicals suggested to control algae blooms and will these chemicals be stored on-site? If the water will be required for emergency storage, will chemicals be necessary to treat the water before supplying it to DWP customers? See above. 7-105

14.0 Visual Resources

14.1.3 SLRC

14.1.3.1 Site Context

p. 14-16
The Transportation Element of the Los Angeles General Plan designates West Silver Lake Drive from Duane Street to Armstrong Avenue as a City Scenic Route.

Correction: The scenic route is Silver Lake Blvd. 7-106

14.2.1.2 Impact Evaluation Criteria

p. 14-27
An important aspect of this analysis was evaluation of the Proposed Project layout drawings; elevations; cross-sections; and, for two views, "after" views provided by the computer-generated visual simulations and their comparison to the existing visual environment.

There are no "after" views to show the water after chlorination treatment has ceased. The community is concerned that the visual impact of the visual change in the water will be highly significant. 7-107

p. 14-27
• The specific changes in the composition, character, and any specially valued qualities in the affected visual environment

The water views have been a clear blue color for several decades. Any change to the water appearance must be considered to be significant. 7-108

p. 14-27
• The numbers of viewers, their activities, and the extent to which these activities are related to the aesthetic qualities affected by the likely changes

As discussed in other chapters the hills that surround SLRC contain several thousand homes, which were built to take advantage of the water views. The number of viewers is in the tens of thousands. 7-109

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Response to Comment 7-105:

LADWP currently plans to permanently remove the reservoirs from service to the water distribution system and allow the reservoirs to revert to a more natural state. The Clean Air Act requires a safety analysis and the development of a risk management program prior to the storage of acutely hazardous materials onsite.

Response to Comment 7-106:

Comment noted and incorporated by reference into this EIR.

Response to Comment 7-107:

The exact appearance of the reservoir after the project is subject to variability. It is anticipated that the reservoir will appear to be bluish-green after chlorination is discontinued.

Response to Comment 7-108:

LADWP's water quality data indicate that water color in the reservoirs has varied from blue to green to brown over the last several decades.

Response to Comment 7-109:

Chapter 14, Visual Resources, of the Draft EIR, addresses the setting of the SLRC, including the fact that the reservoirs are seen from a very large number of residences and that the views of the reservoirs have a high level of visual sensitivity.

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14.2.3 SLRC

14.2.3.1.2 Impacts During Operational Period

p. 14-44
The change in water color would cause a change in the appearance of the views toward the lake like those represented in Photo 7 in Figure 14-8, but the overall visual quality of the view would not be substantially altered.

The community feels that the overall visual quality of the view will be substantially altered. 7-110

p. 14-44
During the 4- to 5-year period after the Silver Lake Reservoir has been taken out of service and before the Ivanhoe Reservoir has been removed from service, the water in the Silver Lake Reservoir would have a greenish hue, while the water in the Ivanhoe Reservoir would remain blue. The contrast in the color of the water in the two reservoirs could call attention to change in color of the water in Silver Lake Reservoir, sustaining an awareness of the color change that could contribute to an increase in the perceived level of visual impact during this interim period.

The "perceived level of visual impact" from the two differing lake colors should not negate the actual level of visual impact, which will be highly significant. 7-111

There is no mention of the 85' spillway on the Ivanhoe dam and the negative visual impact if the flow of water through the spillway is discontinued. 7-112

14.2.3.2 Bypass Pipeline and Regulating Station
14.2.3.2.1 Description

p. 14-45
As detailed in Section 2.2.3.2.1 of the Project Description Chapter, the elements of the regulating station would be enclosed in buried vaults. All vaults would be completely underground, and a grass lawn would be established on top of the area in which they would be buried.

The impact of new structures or hatches at the grassy area west of the Silver Lake Recreation Center is discussed in an earlier chapter. Unless the grass lawn will completely cover the hatches, the exposed hatches must be noted in this chapter. 7-113

14.2.3.2.2 Construction Impacts
p. 14-46
During the construction period, a materials equipment and staging area to support the construction of the bypass pipeline and the regulating station and associated facilities would be established in a portion of the meadow area on the east side of the reservoir. At present, this is an open, grassy area visible from Silver Lake Boulevard. While being used as a staging area, the ground surface is likely to be covered with gravel; and the site would be devoted to storage of vehicles, equipment, and construction materials. Night lighting would be required to assure safety and security. This lighting would be restricted to the minimum required, and all light fixtures would be hooded and directed to the areas where light is needed. During the period in which it is present, the staging area would alter the character of the view toward the meadow and lake

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Response to Comment 7-110:

Comment noted.

Response to Comment 7-111:

The actual level of visual impact is addressed in Chapter 14 of the Draft EIR. Historically, the two reservoirs have been different colors – one more blue and one more green – due to different water detention times.

Response to Comment 7-112:

Please see the response to Comments 7-48 and 7-50.

Response to Comment 7-113:

Please see Master Response A in Section 3.0 of this Final EIR for additional information about the regulating station.

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visible from Silver Lake Boulevard, and would lower the existing level of visual quality, which is now moderate to moderately high. However, these changes would be temporary because, after the construction of the Proposed Project is complete, this area would be restored to its existing condition.

If the meadow is to be used for the Lower Reach RSC RP, how long will the gravel bed, the equipment storage, and security lighting be on site? Once LADWP has no further use of the meadow, the community may prefer a new landscape design in keeping with the Master Plan. 7-114

14.2.3.2.3 Impacts During Operational Period

p. 14-46
Because the regulating station and related facilities would be buried and covered with a restored lawn, the visual changes associated with their presence in the view seen in Photo 10 (Figure 14-9) would be relatively minor.

Due to the multitude of hatches, vent pipes, hoods, and the 6' high cabinet, it would be appropriate to provide a rendering of the Regulating Station sight after completion of construction for this EIR. Without such rendering, this EIR cannot properly analyze the impact of the Regulating Station. 7-115

p. 14-46 – 14-47
Because none of the aboveground features associated with the regulating features would have night lighting, the Proposed Project would not have any light impacts during the operational period.

It may also be necessary to provide a guarantee for timely graffiti removals on any above ground structures. 7-116

14.2.4 Impact Significance

p. 14-47
1. Would the project have a substantial adverse effect on a scenic vista?

In addition, views from the residential hillsides surrounding Silver Lake Reservoir could be considered to be scenic vistas as well. The portion of Silver Lake Boulevard that passes the planned staging area in the SLRC meadow area is also a City-designated scenic route. As documented in the analysis above, the effects of the Proposed Project on the visual quality of these views during the operational period would be relatively minor and would not create the "substantial adverse effect" that would constitute a significant impact.

The community strongly disagrees with the impact determination of this study regarding the quality of the water views after the discontinuation of chemical treatment. 7-117

p. 14-47
During the construction period, there would be a somewhat greater level of change in the views from Forest Lawn Drive and the two cemeteries, and of the view from Silver Lake Boulevard toward the staging area. But these changes would not substantially alter the existing overall level of visual quality of these views and would be temporary in duration.

The alteration of a large lawn with a blue body of water beyond to a gravel covered 7-118

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Response to Comment 7-114:

The meadow is no longer being proposed to be used for the Lower Reach RSC. Following SLRC SRP construction, the meadow would be returned to pre-construction condition or an equivalent condition that reflects community values.

Response to Comment 7-115:

Please see Master Response A in Section 3.0 of this Final EIR for additional information about the regulating station.

Response to Comment 7-116:

The maintenance of above ground structures would be addressed in the Property Maintenance and Management Plan described in Chapter 2 of the Draft EIR.

Response to Comment 7-117:

Comment noted.

Response to Comment 7-118:

Use of the meadow area of the SLRC for a materials and equipment staging area is a construction-related impact. Because it is temporary, it is not considered to be significant. Following SLRC SRP construction, the meadow would be returned to pre-construction condition or an equivalent condition that reflects community values.

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equipment storage area with security lighting is substantial.

14.3.3 SLRC

p. 14-48
3. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

The changes in the color of the lake related to the change in the status and operation of Ivanhoe and Silver Lake Reservoirs would have a relatively small and less-than-significant impact on the quality of views that include these lakes.

The community vehemently challenges this conclusion. Additionally, since the spillway has been considered, this conclusion has not considered all of the variables involved in the views. 7-119

14.3.3.1 Change in Status of the Ivanhoe and Silver Lake Reservoirs
p. 14-49
Measures Included as a Part of the Proposed Project
• An adaptive management plan would be applied that includes semiannual monitoring for nutrients (nitrogen and phosphorous); bimonthly water surveys (algal count, chlorophyll, transparency); turning on the mixer as needed; and in-reservoir alum treatment should algae reach unacceptable levels.
• A maintenance regime for the reservoir property would be established that includes weed abatement, brush trimming, maintaining the meadow area, and relandscaping on an as-needed basis.

Ongoing negotiations with LADWP have resulted in the search for an entity that will assume property management of the SLRC. The appearance and use of the property and the water may need to be altered based on the needs of the future managers and the surrounding community. Will the changes fall under the category of mitigation if restoration is not desirable? An MOU outlining the establishment of a future property steward the needs of such an organization needs to be drafted. The following language needs to be added: LADWP will work with the community to develop a maintenance plan as mitigation for changes in the visual aesthetic of the entire SLRC. Provision must be made to maintain water at a level to the satisfaction of the community based on historic levels. There are currently a large bleached section of the reservoir banks. The top of the bleach mark should represent the minimum mean water level, and an agreement must be made to maintain the future water levels at or above that altitude. That agreement must be executed in the form of an MOU. Additionally, there must be provisions made to allow for the treated water used to maintain the water levels not to conflict with future use of the reservoirs if they are to be naturalized. The chemicals used to treat the topping off water will potentially reach toxic levels when evaporation occurs and water treatment chemical ratios reach a point where they can no longer sustain a healthy natural environment. The community requests the establishment of an ongoing plan to accommodate the replacement (or refreshment) and not just the topping off of water levels. Finally, the final EIR must properly address the impact of the discontinuation, if applicable, of water flow through the spillway on the Ivanhoe dam. 7-120

15.0 Project Alternatives

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Responses to Letter #7

Response to Comment 7-119:

Comment noted. Please see the response to comments 7-48 and 7-50 and Section 4.0 for an evaluation of the visual resource impacts associated with discontinuing the use of the spillway.

Response to Comment 7-120:

The Proposed Project assumes that LADWP is responsible for property management of the SLRC and does not include future alternative management scenarios.

The appearance of the SLRC, including the water and the surrounding grounds and structures, is addressed in the adaptive management plan and the Property Maintenance and Management Plan (PMMP) as described in the Draft EIR. Changes to operations and management of the SLRC not described in the PMMP would be addressed in a separate environmental document.

This Final EIR addresses the impact of potentially discontinuing the use of the spillway. Please see the response to Comments 7-48, 7-50, and 7-56 as well as Section 4.0 of this Final EIR.

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There is no consideration described of the potential use of the reservoirs for emergency storage. 7-121

There needs to be further assessment of lower impact construction techniques for the bypass line, rather than tunneling under WSLD. The Stone Canyon Reservoir is utilizing a submerged pipeline. If this option was considered, the reasons for not choosing such a technique need to be outlined in this chapter. 7-122

16.0 Other CEQA Topics

16.1 Cumulative Impacts

p. 16-1
The CEQA Guidelines (Section 15130) state that "a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." Other projects causing related impacts may consist of "past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency."

As described in earlier comments and reiterated below, the cumulative projects considered for this study did not meet CEQA guidelines. The community feels that the effort to identify cumulative projects was extremely unsatisfactory considering that a number of projects within the control of the agency were not mentioned and that it took less than a week for members of the community to come up with a list of up to 12 major projects that qualify for discussion in this chapter. 7-123

16.1.1 Proposed Project Impacts

16.1.3.1.2 Vicinity of SLRC

p. 16-4
Silver Lake and Ivanhoe Reservoirs Master Plan Implementation
It is anticipated that this path would be completed before construction activities related to the Proposed Project commence. However, other projects related to implementation of the Master Plan may overlap with Proposed Project construction at the SLRC. The Master Plan states that all improvement projects at the SLRC would be reviewed by and negotiated with LADWP.

It is hoped that the perimeter path will be complete before construction activities commence, but the next phase of the project has not entered the planning stage yet, and therefore that project may be jeopardized or delayed due to this proposed project. Other Master Plan projects include the future use of the SLRC property, and will be delayed until access is permitted on the property. 7-124

p. 16-5
Lower Reach River Supply Conduit
Unit 4 is anticipated to be under construction from 2005 to 2007. According to this schedule, the Lower Reach RSC pipeline in the vicinity of the SLRC would overlap with the Proposed Project bypass pipeline construction for approximately 5 months (May to September 2007). An environmental document for the Lower Reach RSC Project is currently being prepared.

Unit 4 is estimated to be under construction until December 2007 extending the overlap to 8 months. These two projects combined have significant impact on the community in all aspects of air quality, noise, traffic, and public services. The full impact of these projects 7-125

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Responses to Letter #7

Response to Comment 7-121:

LADWP does not have plans to use the SLRC for emergency storage. Please see the response to Comment 7-26.

Response to Comment 7-122:

A submerged pipeline was considered for the SLRC SRP. Please see Master Response D in Section 3.0 of this Final EIR for additional discussion of project alternatives.

Response to Comment 7-123:

Cumulative Impacts were addressed in Chapter 16 of the Draft EIR. Please see Master Response C in Section 3.0 of this Final EIR for additional cumulative impacts analysis.

Response to Comment 7-124:

Comment noted.

Response to Comment 7-125:

The cumulative impacts of SLRC SRP construction along with other construction projects in the same vicinity were addressed in Chapter 16 of the Draft EIR. Please see Master Responses B (Segmentation) and C (Cumulative Impacts) in Section 3.0 of this Final EIR for additional information.

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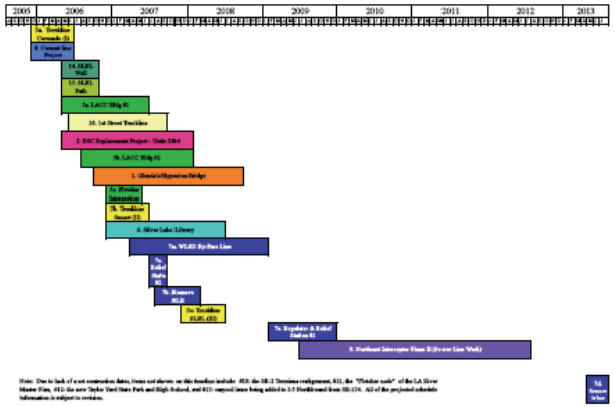
together needs to be thoroughly assessed. Furthermore, there is no mention of the fact that the Lower Reach River Supply Conduit is the direct link from the Headworks site to the SLRC and that one of the likely reasons for the necessity of its replacement at this time is to accommodate the increased pressure and additional volume in the pipeline that will be required when water that was stored at SLRC is relocated to the Headworks site. The separation of these two projects on paper into two separate environmental documents is arguably a case of segmentation and goes against CEQA guidelines. One must ask whether the project outlined in this EIR would be feasible without replacing the River Supply Conduit. Without such feasibility, then segmentation does exist.

7-125 (Cont.)



We have compiled the above construction timeline for all of the known cumulative projects.

7-126

16.1.3.2 Other Projects
16.1.3.2.2 Vicinity of SLRC
p. 16-5
State Route (SR-2) Freeway Terminus Improvement

The LADWP Trunk Line slip-line Projects, the cement-line small main project, the Glendale/Hyperion Bridge Retrofit, the LACC campus construction, the new LAPL Silver Lake Branch Library, The Northeast Interceptor II, the Taylor Yard State Park & High School, the I-5 Northbound carpool lanes all should be included here (in addition to the RSC and the Rt. 2 terminus realignment) and properly analyzed for cumulative impacts. All project information should be here and identified on a map with a construction timeline.

7-127

p. 16-9
Traffic and Transportation

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Responses to Letter #7

Response to Comment 7-126:

These cumulative projects are addressed in Master Response C of Section 3.0 of this Final EIR.

Response to Comment 7-127:

Please see Master Response C in Section 3.0 of this Final EIR for additional information on cumulative impacts.

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The Proposed Project would potentially result in adverse traffic impacts at the intersection of Silver Lake Boulevard and Van Pelt Place. Bypass pipeline construction would also result in potential in-street impacts along West Silver Lake Drive, although these impacts would likely be less than significant. Lower Reach RSC construction would overlap Proposed Project construction by approximately 4 months.

There is no mention of the slip-line water main replacement project at SLBL. At what point will SLBL be closed for the slip-line (Trunk Line) project, and for how long? Our timeline shows that these two projects are a year apart from each other. Would it make more sense to do them both at the same time in order to minimize traffic impact? 7-128

p. 16-9
The environmental document for the Lower Reach RSC would include mitigation to reduce construction traffic impacts, and the Proposed Project would be included in the Lower Reach RSC environmental document as a cumulative project.

This proposed project was discussed in the LRRSC environmental document in relation to its proximity to the Headworks site only. The SLRC construction segment was completely omitted from that document. 7-129

p. 16-9 to 16-10
In addition, both the Lower Reach RSC project and the Proposed Project would require construction management traffic plans to be approved by LADOT.

The traffic management plans do not exist as yet, and the community realistically feels there is no way to mitigate traffic sufficiently due to the lack of proper detour routes. The existing commuter traffic problems (caused by the fact that all of the involved streets are used as freeway alternates during peak hours) portends unmanageable traffic problems that will not only slow construction but also will severely affect the quality of life in the region. 7-130

p. 16-10
Traffic and transportation impacts from the SR-2 FTIP and the Lower Reach RSC would likely be individually significant. Given the above discussion, however, it is unlikely that impacts would be cumulatively significant when combined with the Proposed Project, nor is it likely that projects related to the Master Plan implementation would be cumulatively significant in conjunction with the Proposed Project. Mitigation identified for the Proposed Project and anticipated to be required for the SR-2 FTIP and the Lower Reach RSC would help ensure that cumulative impacts would be less than significant.

The traffic impacts from the two mentioned projects will be significant and there are several other projects to be considered as well. As cumulative projects it's hard to grasp how several significant impact projects running simultaneously can amount to a less-than-significant impact rating overall. This determination is completely unrealistic and indicates a serious denial of reality in the conclusions drawn by the authors of this EIR. Such a determination is evidence of a complete disregard for CEQA guidelines. 7-131

Noise
p. 16-10 to 16-11
The Proposed Project includes mitigation intended to reduce or eliminate significant noise impacts, including implementation of a noise mitigation and monitoring program, although it is possible that noise impacts cannot be completely mitigated. This monitoring program would take

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Response to Comment 7-128:

Please see Master Response C in Section 3.0 of this Final EIR for additional information regarding cumulative impacts.

Response to Comment 7-129:

Chapter 16 of the Draft EIR addressed the cumulative impacts of the Proposed Project in conjunction with the Lower Reach RSC Project. Additional information regarding cumulative impacts may be found in Master Response C of Section 3.0 of this Final EIR.

Response to Comment 7-130:

The Traffic Management Plan (TMP) for the Proposed Project would be prepared in coordination with LADOT, who would ensure that appropriate detour routes are selected where necessary, given existing traffic conditions at the time of construction. LADWP will work with LADOT to ensure that the Proposed Project will cause the least possible impact by including in the TMP the least impacting, safest detour routes possible.

Response to Comment 7-131:

Cumulative impacts from the SLRC SRP in conjunction with other construction projects in the same vicinity were evaluated in Chapter 16 of the Draft EIR. The cumulative impact analysis concluded that several resource areas would possibly have temporary significant cumulative impacts after mitigation, including traffic and transportation, noise, and air quality. Please see Master Response C in Section 3.0 of this Final EIR for additional information regarding cumulative impacts.

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into account the 4 months of overlapping construction between the Lower Reach RSC and the Proposed Project and would implement additional mitigation measures, if necessary.

All of the other projects need to be added to this assessment, and the noise of car horns from stalled commuter traffic has not been taken into consideration. 7-132

Air Quality
p. 16-11
Because air emissions can be considered on a regional basis, any project being constructed in the general vicinity of the SLRC during the same construction time frame may contribute to cumulatively significant air quality impacts.

A regional basis study would show that there is a multitude of construction projects proposed in a wide area and that they will all have adverse effects on air quality. The projects that will have a direct impact on the Silver Lake community are right in the neighborhood, and will involve not just the construction projects themselves, but the increased levels of car exhausts due to the commuters being stuck in traffic for up to six hours each day on the residential streets. There has been no mention of this impact in this study. 7-133

16.1.5 Cumulative Impacts Summary and Conclusions
p. 16-12
Three projects were identified that could potentially be constructed during the same time frame as construction at the SLRC for the Proposed Project: projects related to the Master Plan implementation, the LADWP Lower Reach RSC, and the MTA SR 2 FTIP.

The community has compiled the list below of cumulative projects: 7-134

1. Hyperion Bridge retrofit and rehabilitation
Schedule: To begin 10/06 for 2 years.

One lane in each direction will be closed.

Contact: Ejike Mbaruguru, MS, PE Embarugu@ENG.LACITY.ORG Project Manager
Bureau of Engineering - Bridge Improvement Group 250 East 1st St., suite 700 Los Angeles, CA 90012
Phone: 213 847 9666
Fax: 213 847 5633

2. DWP Lower Reach River Supply Conduit Replacement Project (3&4)
Scheduled: Unit 4: (6/06 1/08)
Unit 3: (5/06-11/07)
Unit 4: Will consist of trenching. Street closings during a 567 day period will be verified: Glendale Bl, Rowena north to Riverside Dr closed. Glendale Bl from the Fire Station intersection to Fletcher, and Rowena from the Fire Station intersection to W. SL Dr one lane in each direction closed. Left turn lanes will be closed. (Each of these streets will be closed approx. 4 weeks, and the left turn lanes will be closed for "considerably longer"). Side streets will be impacted.

Unit 3: Located in Griffith Park. Crystal Springs Dr. will be closed.

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Responses to Letter #7

Response to Comment 7-132:

Cumulative impacts from the SLRC SRP in conjunction with other construction projects in the same vicinity were evaluated in Chapter 16 of the Draft EIR. Please see Master Response C for additional information regarding cumulative impacts.

Response to Comment 7-133:

Cumulative impacts from the SLRC SRP in conjunction with other construction projects in the same vicinity were evaluated in Chapter 16 of the Draft EIR. Please see Master Response C in Section 3.0 of this Final EIR for additional information regarding cumulative impacts.

Response to Comment 7-134:

These cumulative projects are addressed in Master Response C of Section 3.0 of this Final EIR.

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Note: There will also be activities related to slurrying obsolete supply conduits. The dates for slurrying are as yet undefined.

Contact: Anselmo Collins (213) 367-0838

3. DWP Silver Lake Blvd. Trunkline project
Scheduled: Winter months 2005 - 2008

To be done in three phases:
A. (12/05-6/06) Phase I on Coronado from Sunset to Bellevue by SR 101
B. (12/06-6/07) Phase II on Sunset from SLBL to Coronado
C. (12/07-6/08) Phase III on SLBL from Sunset north to Swan

Will consist of Jacking pits located (no information available)
No information about lane closures or parking spaces taken

Contact Design Manager, Mr. Dean Terada
(213) 367-1038
Water Engineering & Technical Services
Pipeline Rehabilitation

4. DWP Small Main Cement Lining Project
Scheduled: 12/05 to 6/06

From the intersection of Fletcher or SL Bl north on Glendale Bl. Unclear as to which other streets will be impacted. Details to come.

5. LA City College/Northeast Campus
(formerly the Van de Kamps Bakery) SE Corner Fletcher & San Fernando Rd.

Schedule:
A. Building 1: construction to begin 3/06 for 12-15 months
B. Building 2: construction to begin 8/06 for 15-18 months
C. Intersection work: (SF Rd & Fletcher) widening and adding right turn lanes to begin 1/07 for approx. 6 months

Contact: Dr. Merrill Eastcott, VP of Administration (project manager)
eastcome@lacitycollege.edu
(323) 953-4000 x2085

6. Silver Lake Branch Library
(Southwest corner of Silver Lake Bl & Glendale Bl)

Tentative schedule: Break ground by the end of 2006/early 2007 and finish construction by mid 2008.

Contact: Juliana Cheng
jcheng@lapl.org
213-228-7576

8. Per Councilmember Tom LaBonge. "W SL Dr Project for $450,000"
(no details available as of 6/10/05)

9. Northeast Interceptor Phase II (Sewer Line Work)

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Tentatively scheduled: 7/2009 to 7/2012.
This is a 2 location tunneling project with jacking pits.

Project starts at SF Road near Division St. North to Casitas near Fletcher. Glendale Bl to Seneca (all in Public Right of Way) then under Costco west to Alger (just north of Chevy Chase) back to SF Road cross at Brazil under LA River to Zoo. Termination location is undecided, but somewhere in or adjoining Griffith Park.

The second route also starts at SF Rd and Division heads southwest to Fletcher along the railroad ROW under the LA river to Riverside Drive then west to Crystal Springs to the LAPD facility in Griffith Park then terminating in one of 2 locations near zoo.
Contact: Nick Demos, Project Manager, BOE
(213) 847 9600

10. Glendale Freeway Terminus project
Anticipated project start is unknown.
Will consist of the reconfiguration of the on/off ramps at Glendale Blvd.
Project is in beginning phase of ane EIR process

11. LA River "Fletcher node"
May or may not be assigned.
Monitor as LARiver MP unfolds

12. Taylor Yard Park State Park & High School Development
Contacts:
Sean Woods 213 620 6406
Fernando Chevarri a (LAUSD) 213-633-8131.

13. I-5 Northbound carpool lanes
Activities involved commencing in the northwest SFV and working its way south to SR-134.
Contact:
Caltrans spokesperson: Jeanne Bonfilio

14. Silver Lake Blvd. Retaining Wall
Replace collapsed retaining wall on SLBL.
(5/06-10/06)
Contact:
Saba Engineer, Project Manager, BOE
213-847-5046

15. Silver Lake Master Plan Implementation Phase II
Complete perimeter path around Silver Lake Reservoir Complex
(5/06-11/06)

Contact:
Saba Engineer, Project Manager, BOE
213-847-5046

16. 1st Street Trunkline
Connect Hollywood area water storage to River Supply Conduit customers
1st Street from Van Ness to Dillon & Beverly Blvd. (includes constructing 7c (part.) Relief Station #2 in scope of work)
(6/06-9/07)

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Contact:
Evelyn Cortex-Davis, Project Manager, DWP
212-367-0911

p. 16-12
BMPs and mitigation measures, both for the Proposed Project and for the cumulative projects, have been identified to reduce potential impacts; but it is anticipated that construction-related cumulative impacts may remain significant after mitigation for noise, traffic and transportation, and air quality at the HWSG site and noise and air quality at the SLRC.

There is no mention of the traffic impact in the conclusion. With the RSC alone, there will be significant traffic issues. With the closing of SLBL to construct the Relief Station vault, the impact will be highly significant. Add in all of the other known projects and the traffic plans are inadequate, or even unworkable, and the impacts will be highly significant. 7-135

Appendix D
2.3.2 Silver Lake History

p. 19
The method employed to construct Silver Lake Reservoir was unique. Under Superintendent Mulholland's plans and supervision, an innovative hydraulic sluicing technique adapted from the mining industry was used to dredge soil from what would become the lake bed and move the material to form the earthen dam to create the reservoir. This was the first time the method had ever been used in the United States. The process proved so successful that engineers came from all parts of the country to study the method. Mulholland served as a consultant on numerous hydraulic fill dams built between 1910 and 1930, including the enormous Gatun Dam in the Panama Canal (Rogers 1995:23). Until 1923, all of the LA Bureau of Water Works and Supply reservoirs were earthen embankments, built using Mulholland's hydraulic sluicing techniques.

Could SLRC receive special recognition from the American Society of Civil Engineers for this unique status? Would LADWP be interested in petitioning for the status and dedication of the site on this basis? 7-136

p. 22
Silver Lake and Ivanhoe Reservoirs
Silver Lake and Ivanhoe Reservoirs were designated City HCM No. 422 in March 1989. The nomination refers specifically to only the reservoirs and dams, noting their importance in the growth of the city and to its water system, declaring that "Silver Lake is as much a landmark as any structure of mortar or stucco" (Kanner 1989).

The Ivanhoe dam has an 85' spillway with a rapid flow of water. The spillway with water flowing through it is an integral part of the appearance of the dam. Any change to this cultural monument would be highly significant, and yet there is no mention of any impact from discontinuation of water flowing into Ivanhoe Reservoir, and by extension, over the spillway into Silver Lake Reservoir. The visual impact of this change will be a detriment to the overall visual appearance of the reservoirs. 7-137

3.2 Evaluation of Significance
3.2.2 SLRC
p. 36

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Responses to Letter #7

Response to Comment 7-135:

Cumulative traffic impacts are discussed on pages 16-10 and 16-11 of the Draft EIR. Additionally, please see Master Response C in Section 3.0 of this Final EIR for additional information regarding cumulative impacts.

Response to Comment 7-136:

While LADWP has nominated portions of its infrastructure for special recognition in the past, there are currently no plans to petition Silver Lake Reservoir for this status. Any such action would be apart from the scope of the Proposed Project and therefore not considered under this EIR.

Response to Comment 7-137:

Please see the response to Comments 7-48, 7-50, and 7-56.

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The Silver Lake Reservoir Complex, comprised of both the Ivanhoe and Silver Lake Reservoirs and surrounding city-owned property, appears eligible for listing in the California Register as an historic district. The Silver Lake Reservoir and Dam was the first facility built by Superintendent William Mulholland and the Water Department using a unique water sluicing technique.

Silver Lake and Ivanhoe Reservoirs and Dams are presently listed as City Historic Cultural Monument #422. The community requests courtesy advance notification before any historic structures on the site are altered or demolished so that a determination of potential community value can be assessed. 7-138

p. 36
The LADWP made a conscious effort to achieve a pleasing aesthetic appearance at the facilities. The initial design of the reservoir property and subsequent renovations have sought to provide a richly landscaped, natural appearance. The buildings associated with the reservoir complex, in keeping with LADWP's philosophy of facilities design of the era, were attractively rendered to integrate with and enhance the adjacent residential neighborhoods. Referring to Department chlorine stations, the *Intake* in 1932 took pride in stating that, "Beauty is combined with utilities in buildings of the Department of Water and Power" (LADWP 1932:4).

SLRC is not currently known for its beautiful landscaping or architecture. It is more associated with the prison-like chain link fence, the steep, cracked, and poorly patched asphaltic/concrete lined banks, and the boarded up structures along the perimeter. This appearance is the direct result of years of deferred maintenance and neglect on the part of the property owner, LADWP. 7-139

p. 36
Additionally, the aesthetic appeal resulting from LADWP's creation of a natural appearing "lake" amid trees and lush native and introduced vegetation functioned as a magnet for private development of the hillsides overlooking the reservoirs.

LADWP should be committed to restoring SLRC to its intended beauty after the current lengthy period of neglect. 7-140

p. 43
Provided that current project specifications, which call for the SLRC facility and property to be maintained consistent with the appearance and condition that LADWP has provided at this facility for several years, project impacts related to the change in function of the Silver Lake and Ivanhoe Reservoirs are not considered to be potentially significant adverse and no additional measures are necessary.

The appearance of SLRC represents many years of neglect and is not satisfactory or of an equal standard to the surrounding community. If the appearance is to remain unchanged, then this EIR must address how LADWP plans to maintain the existing flow of water over the spillway. 7-141

Appendix F
Traffic and Transportation
REVISED DRAFT
July 2004

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Responses to Letter #7

Response to Comment 7-138:
LADWP has no plans to alter or demolish existing structures at the SLRC for the Proposed Project.

Response to Comment 7-139:
Comment noted.

Response to Comment 7-140:
Comment noted.

Response to Comment 7-141:
Comment noted. Please see the response to Comments 7-48, 7-50, and 7-56.

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II. EXISTING CONDITIONS
EXISTING STREET SYSTEM
SLRC Site
p. 8-9
The major streets that serve the potential SLRC site are Glendale Boulevard, Fletcher Drive, Silver Lake Boulevard, and Hyperion Avenue in the north-south direction, and Riverside Drive, Van Pelt Place, and Rowena Avenue in the east-west direction.

LADWP was notified in preliminary discussion of this DEIR that there is a known problem with commuters cutting through the residential neighborhood on the east hill bordering SLRC to access SLBL from the Rt. 2 freeway. Figure 4A verifies that with a study of 300 cars per hour in the morning and 140 cars per hour in the evening. Duane St. is a very steep residential hill with a posted speed limit of 15MPH at the top. There is no study of this potential truck route. 7-142

p. 9
Glendale Boulevard - Glendale Boulevard is a major north-south arterial. It provides four travel lanes, two lanes in the northbound direction and two lanes in the southbound direction. Glendale Boulevard provides local access to the SLRC site through a connection to Silver Lake Boulevard, while it also provides regional access through a connection to both I-5 and SR-2. The posted speed limit is 35 miles per hour (mph).

A crucial link along Glendale Blvd. to the 5, 2, and 134 freeways and Glendale, Pasadena, and other points east was closed for just over a month in 2005 due to rain caused earth movement. The impact to the traffic flow generated massive traffic delays throughout the neighborhood, impacting Glendale Blvd, Rowena, and Silver Lake Blvd. The RSC DEIR states that this link will be shut down for that project. Any major closure needs to be addressed in this DEIR under traffic, and under air quality since there will be several hundred cars sitting on neighborhood streets for several additional hours, every day. The intersection of Glendale Blvd and Rowena Ave (where Glendale turns east to connect with Riverside and the freeways) needs to be included in this study. 7-143

p. 9
Van Pelt Place - Van Pelt Place is an east-west roadway. It provides one travel lane in each direction. Van Pelt Place provides direct access to the SLRC site. Parking is allowed on both sides of the street within the study area. The posted speed limit is 25 miles per hour.

The width of Van Pelt place in insufficient to provide two opposing lanes of traffic, and both side parking when one of the lanes is occupied by a truck. It's clear that one parking lane will be closed. What isn't clear is why that fact has not come up in this DEIR when the community warned of this fact in preliminary discussions. Please see main body DEIR notes for further mitigation suggestions. 7-144

Areawide Traffic Growth
p. 22
The traffic in the vicinity of the study area has been estimated to increase historically at a rate of about 1% per year. Future increases in the background traffic volumes due to regional growth and development are expected to continue at this rate. With the assumed completion date of 2013, the existing 2004 traffic volumes were adjusted upward by a factor of 9% to reflect this areawide regional growth.

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Responses to Letter #7

Response to Comment 7-142:

Duane Street is not considered to be a potential truck route for the Proposed Project.

Response to Comment 7-143:

As shown in figures throughout Draft EIR Chapter 9, Traffic and Transportation, and Appendix F, the intersection of Rowena Avenue and Glendale Boulevard is outside of the potential impact area for the Proposed Project and therefore is not anticipated to be shut down for project-related construction activities. Cumulative impacts from the SLRC SRP in conjunction with other construction projects in the same vicinity were evaluated in Chapter 16 of the Draft EIR. Please see Master Response C for additional information regarding cumulative impacts.

Response to Comment 7-144:

The limited width of Van Pelt Place is addressed in Chapter 9 of the Draft EIR. Any necessary parking removal would be addressed in a Transportation Management Plan for the Proposed Project.

Comment Letter #7

SLRCSR DEIR Comments
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Technically, the factor should be 9.37% due to the compounding of the 1% increase annually. What is the source of information for the 1% annual increase? With the city policy and the Area Plan encouraging explosive rezoning and growth in the community, it is doubtful that 1% will be constant for the next 9 years. 7-145

Cumulative Project Traffic Generation and Assignment
p. 25
As indicated, the second major source of traffic growth in the study area is expected from other future development projects in the area. These related projects or "cumulative projects" are those planned developments expected to be completed within the same timeframe as the proposed project construction plan. Data describing cumulative projects in the area was obtained from the City of Los Angeles Department of Transportation (LADOT). In addition, cumulative projects within the City of Glendale and Burbank were obtained from recent traffic studies completed within the HWSG study area. 17 cumulative projects were identified within the study areas and their locations are shown in Figure 6.

p. 26

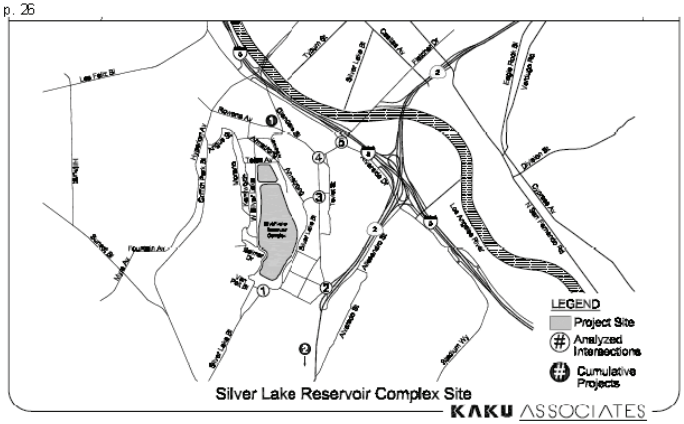

FIGURE 6
RELATED PROJECTS LOCATION

Figure 6 only lists two cumulative projects in the area and neither of those two projects is discussed in the cumulative impacts chapter (16). Since there are actually several major projects, Figure 6 needs to be updated to include all of those projects. 7-146

p. 27

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Responses to Letter #7

Response to Comment 7-145:

The 1 percent annual increase was determined in conjunction with LADOT, who provided review of the assumptions used in the traffic and transportation analysis.

Response to Comment 7-146:

Please see the response to Comment 7-80. Figure 6 of the Technical Appendix is the same as Figure 9-6 in the Draft EIR.

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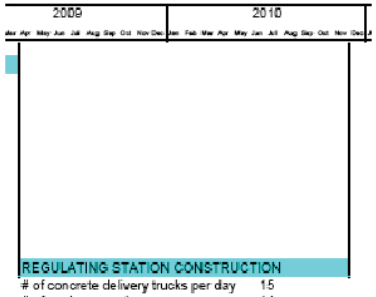
CSSLR 9/19/05

TABLE 5
RELATED PROJECTS TRIP GENERATION ESTIMATES

No	Project	Project Description	City	Location	Size	TRIP GENERATION ESTIMATES		
						Net Daily	Net AM Peak Hour	Net PM Peak Hour
1	Restaurant & Bar [a]	Restaurant & bar w/ live entertainment	Los Angeles	Rowena Av & Rokeby St	6.055 KSF	455	4	38
2	Belmont New Primary Center No. 12 [a]	New Primary school to accommodate max daily enrollment of 380 students w/36 parking spaces	Los Angeles	Lake St & Beverly Bl	380 students	340	70	0

In relation to Figure 6, Table 5 has the two aforementioned projects that are not discussed in Chapter 16. Table 5 needs to be updated as well. It is rather strange that a restaurant remodel at the corner of Rokeby and Rowena is mentioned here but the RSC Replacement project, which will actually be closing, or restricting both of those streets for several weeks is not. 7-147

p. 33



# of concrete delivery trucks per day 15
# of workers per day 14

	Daily	AM Pk Hr In	AM Pk Hr Out	PM Pk Hr In	PM Pk Hr Out
# of truck trips [a]	75	8	8	8	8
# of worker trips	28	14	0	0	14
Total	103	22	8	8	22

Table 6 on page 33 suggests that the construction period for the regulating station will run from April 2009 until December 1010. This is approximately a full year longer than Chapter 2 states on p. 2-28. How long will this construction take? 7-148

Neighborhood Traffic Impacts
p.52
Trucks entering and leaving the site, however, would be directed to avoid unnecessary use of the residential streets. Truck routes would be designated as part of the traffic control plan that should

41 of 45

Responses to Letter #7

Response to Comment 7-147:

Please see the response to Comment 7-80. Figure 6 of the Technical Appendix is the same as Figure 9-6 in the Draft EIR and Table 5 of the Technical Appendix is the same as Table 9-7 of the Draft EIR.

Response to Comment 7-148:

The information in the Technical Appendix is incorrect. Page 2-28 of the Draft EIR is correct; regulating station construction would run from approximately April through November 2009.

Comment Letter #7

SLRCSR DEIR Comments
CSSLR 9/19/05

be submitted to LADOT for their approval.

"Avoid" is too weak a word. 7-149

p. 52-53
The additional 42 daily trips made by the 21 construction workers are likely to access the site through majpr roadways such as Silver Lake Boulevard and Glendale Boulevard, as shown in the trip distribution in Figure 9A. Assuming a portion of the 42 daily trips would use one of the residential streets, the additional traffic is insignificant considering the number of trips is small. Based on the maximum trip generation estimates at the SLRC site, the project related increase in daily traffic in any of the residential streets are not expected to exceed any of the neighborhood intrusion impact criteria identified above. Therefore, the potential impact at the surrounding neighborhood streets would also be insignificant at the SLRC site.

The study must add in the data from other proposed projects and the fact that commuters will be scrambling through surrounding streets and then reconsider the finding of insignificant. 7-150

Silver Lake Reservoir Complex Storage Replacement Project - Traffic Study Addendum

Relief Station Construction

p. 4
Two relief stations would be constructed within streets in the Project area. The first relief station would be located on Silver Lake Boulevard, to the northeast of the Y-intersection with West Silver Lake Drive, just north of Effie Street. For most of the construction period, one lane of traffic in each direction would be maintained on Silver Lake Boulevard. However, during vault construction, Silver Lake Boulevard would be closed; and traffic would be detoured (via West Silver Lake Drive or North Occidental Boulevard).

N. Occidental is only one lane. When, how long, and how does this plan work as a possible detour when Silver Lake Blvd. is closed? 7-151

Revised Mitigation Measures

Mitigation Measure TT-2: Silver Lake Boulevard and Van Pelt Place

p. 4
Truck deliveries for materials or equipment will be scheduled so that none of the truck trips would arrive or depart the SLRC during the afternoon peak period between 4:00 p.m. and 6:00 p.m. Any truck deliveries will occur before the afternoon peak period.

There is no provision to mitigate the morning peak period that carries the same number of commuter traffic through the same streets to the same detrimental effect. 7-152

Mitigation Measure TT-3: Transportation Management Plan

p. 5
Emergency access restrictions associated with the Proposed Project, including proper notification of emergency providers and provision of alternate routes, if necessary. All construction activities will be coordinated with local law enforcement, fire protection, and other emergency service providers. These entities will be notified of the timing, location, and duration of construction activities.

42 of 45

Responses to Letter #7

Response to Comment 7-149:

Truck routes would be determined in conjunction with a Transportation Management Plan for the Proposed Project. It is unlikely that residential streets would be identified by LADOT for construction truck traffic.

Response to Comment 7-150:

Cumulative impacts from the SLRC SRP in conjunction with other construction projects in the same vicinity were evaluated in Chapter 16 of the Draft EIR. The analysis concluded that it is possible that temporary significant cumulative impacts related to traffic and transportation may remain after mitigation. Please see Master Response D for additional information regarding cumulative impacts.

Response to Comment 7-151:

Actual detour routes would be determined by LADOT in conjunction with a Transportation Management Plan that would be prepared for any in-street construction.

Response to Comment 7-152:

Please see the response to Comment 7-95.

Comment Letter #7

SLRCSR DEIR Comments
CSSLR 9/19/05

As the community representative, CSSLR would like to receive these notifications as well. 7-153

There is no mention of cumulative impact in Silver Lake, which is surprising since there are several other major projects proposed in the area between present day and 2013, and the neighborhood is adjacent to downtown Los Angeles, five major freeways, has only two surface street bridge crossings to neighboring cities, and is an internet published known commuter shortcut. 7-154

Any changes in the main chapters, including but not limited to descriptions of resources, addition of wildlife species, traffic restrictions or the dispensation of artifacts, must be updated in Table ES-1. 7-155

Below are a couple of examples of mitigation measures the community feels need to be modified. Appearance of examples here does not preclude the addition of further changes to this chapter: 7-156

There is no mention of mitigation as a result of DSOD dam ratings. In the event that DSOD determines that a dam is unstable, mitigation needs to be outlined to the satisfaction of the community. 7-157

Conclusions

Per CEQA guidelines, the community demands to see more attention paid to the cumulative effects of multiple projects on traffic, noise, and air. Without that attention, the impact of the environment is not being properly assessed, and the full purpose of this report falls short of its goal. 7-158

While the cultural resources have been identified, there doesn't seem to be any recognition of what the future will provide to protect those resources or to identify how the change to the SLRC property will affect them. One key element of the Historic Cultural Monument includes Ivanhoe Dam, and the spillway is an integral part of that dam. Without water flowing over the spillway, the appearance of dam will be drastically altered. Such change has been completely omitted from this study. 7-159

The MOU negotiation process regarding future use and appearance of the reservoir site process has yet to begin. Without a description of the MOU process in the body of this document, the community has no guarantee of an MOU ever being drafted. The DEIR must plainly state what office and personnel at LADWP will meet with the community to draft the MOU and when the process will begin. 7-160

There needs to be delineated a more specific plan for the future of the dams, and an outline of scenarios for the treatment of the bodies of water that they form. Water quality is extremely important since the community has formed because of the water views. Therefore all of the possible scenarios of water maintenance, and how that may affect its appearance and use, need to be properly explored and described herein. 7-161

The community has had no access to expert analysis of this DIER since November 2004, and as a result may be highly vulnerable to the negative impact that could result from loopholes 7-162

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Responses to Letter #7

Response to Comment 7-153:

A CSSLR representative would receive the general access restriction notifications associated with the Proposed Project.

Response to Comment 7-154:

Please see the response to Comment 7-150.

Response to Comment 7-155:

Table ES-1 has been updated; please see Section 4.0 of this Final EIR.

Response to Comment 7-156:

No mitigation measures are identified by the commenter.

Response to Comment 7-157:

The dams at the SLRC will remain under the jurisdiction of the Department of Dams and would be maintained in accordance with state mandated requirements.

Response to Comment 7-158:

Cumulative impacts are addressed in Chapter 16 of the Draft EIR. Additionally, Master Response C in Section 3.0 of this Final EIR includes information about Cumulative Impacts.

Response to Comment 7-159:

As discussed in the Project Description and the Cultural Resources chapters of the Draft EIR, the Proposed Project would not have a significant adverse impact on cultural/historic resources, as no historic structures at the SLRC would be removed or modified for the Proposed Project. Also, please see the response to Comment 7-56.

Response to Comment 7-160:

A discussion of an MOU with the community is outside the scope of the EIR.

Comment Letter #7

SLRCSR DEIR Comments
CSSLR 9/19/05

that may be built into the language contained herein. If any issues that arise due to detrimental impacts of this project on the surrounding community require litigation, it is expected that any inadequacies of our inexpert analysis of this DEIR will be taken into consideration. 7-162 (Cont.)

There appears to be a gross imbalance in mitigation between HWSG and SLRC even though the Silver Lake community will endure a massive tunneling project, loss of green parkland, street disruptions, detrimental change to water views, possible destruction of a waterfall, potentially reduced property values, and several years of construction impacting the thousands of people who live or walk around the reservoir every day. HWSG has no local inhabitants to suffer the impact of the construction, and the site is currently an abandoned eyesore. The tables seem oddly tilted to benefit very few people while little or nothing is being offered to a community, which will suffer the many adverse effects of this project for years to come. How much is being spent of mitigation for each end of the project, and how are these figures justified? 7-163

The alleged segmentation of the River Supply Conduit Replacement Project and the subject of this EIR must be addressed. 7-164

Finally, there is no mention of Mitigation Monitoring in any of the draft language in this document. The community feels extremely vulnerable and unprotected by a DEIR that neglects to ensure that suggested mitigation will be properly implemented. Where is the Mitigation Monitoring chapter, and why has it not been available during the draft stages of this process? Other DWP projects in the past have had draft Mitigation Monitoring chapters available throughout the Administrative Draft process. Without community input to the Mitigation Monitoring chapter there is no guarantee that any of the mitigation monitoring will be sufficient to properly address the negative impacts the project will have on the Silver Lake community which was built around the vital resource known as the Silver Lake Reservoir Complex. 7-165

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Responses to Letters #7

Response to Comment 7-161:

The Proposed Project will not alter Silver Lake or Ivanhoe Dams. Water quality of Silver Lake and Ivanhoe reservoirs will be addressed in a Property Maintenance and Management Plan.

Response to Comment 7-162:

Comment noted. It should be noted that LADWP has been engaged with the community in regular discussions regarding the Proposed Project for several years.

Response to Comment 7-163:

The apparent imbalance in mitigation between the HWSG site and the SLRC is the result of locating the bulk of the Proposed Project at the HWSG site. As most of the potentially significant impacts are at the HWSG site, so are most of the mitigation measures. LADWP worked diligently with the Silver Lake community to develop a project that would minimize the impacts associated with the construction and operation of a water quality treatment facility or covered water storage at the SLRC.

Response to Comment 7-164:

Please see Master Response B in Section 3.0 of this Final EIR for a discussion of segmentation.

Response to Comment 7-165:

The mitigation measures that would be included in a Mitigation Monitoring Plan were fully identified throughout the Draft EIR and included in their entirety in Table ES-1. Some mitigation measures included in the Draft EIR have been modified slightly; revisions are included in Section 4.0 of this Final EIR. Appendix A of this Final EIR includes the MMP.

Comment Letter #8

Sent By: LOS ANGELES COUNTY; 626 979 5493; Sep-20-05 5:17PM; Page 1/1

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone (626) 458-5100
www.ladpw.org

DONALD L. WOLFE, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE
REFER TO FILE: LD-0

September 20, 2005

Mr. Robert Prendergast
Department of Water and Power
111 North Hope Street, Room 1348
Los Angeles, CA 90012

Dear Mr. Prendergast:

REVIEW OF DRAFT ENVIRONMENTAL IMPACT REPORT
SILVER LAKE RESERVOIR COMPLEX STORAGE REPLACEMENT PROJECT
CITY OF LOS ANGELES

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the above-mentioned project. We have reviewed the DEIR and offer the following comments for your consideration:

If signs are posted as discussed in mitigation measure LU-1, for the potential disruption of the equestrian trail that traverses the northeast portion of the Headworks Spreading Ground site, we recommend the design of these signs be consistent with the guidelines established by the Los Angeles River Signage Program. 8-1

If you have any questions regarding these comments, please contact Ms. Clarice Nash at (626) 458-5910.

Very truly yours,

DONALD L. WOLFE
Director of Public Works

ROSSANA D'ANTONIO
Assistant Division Engineer
Land Development Division

CRN:jmw
P:\CEQA\CLARICE\Silverlake\DEIR

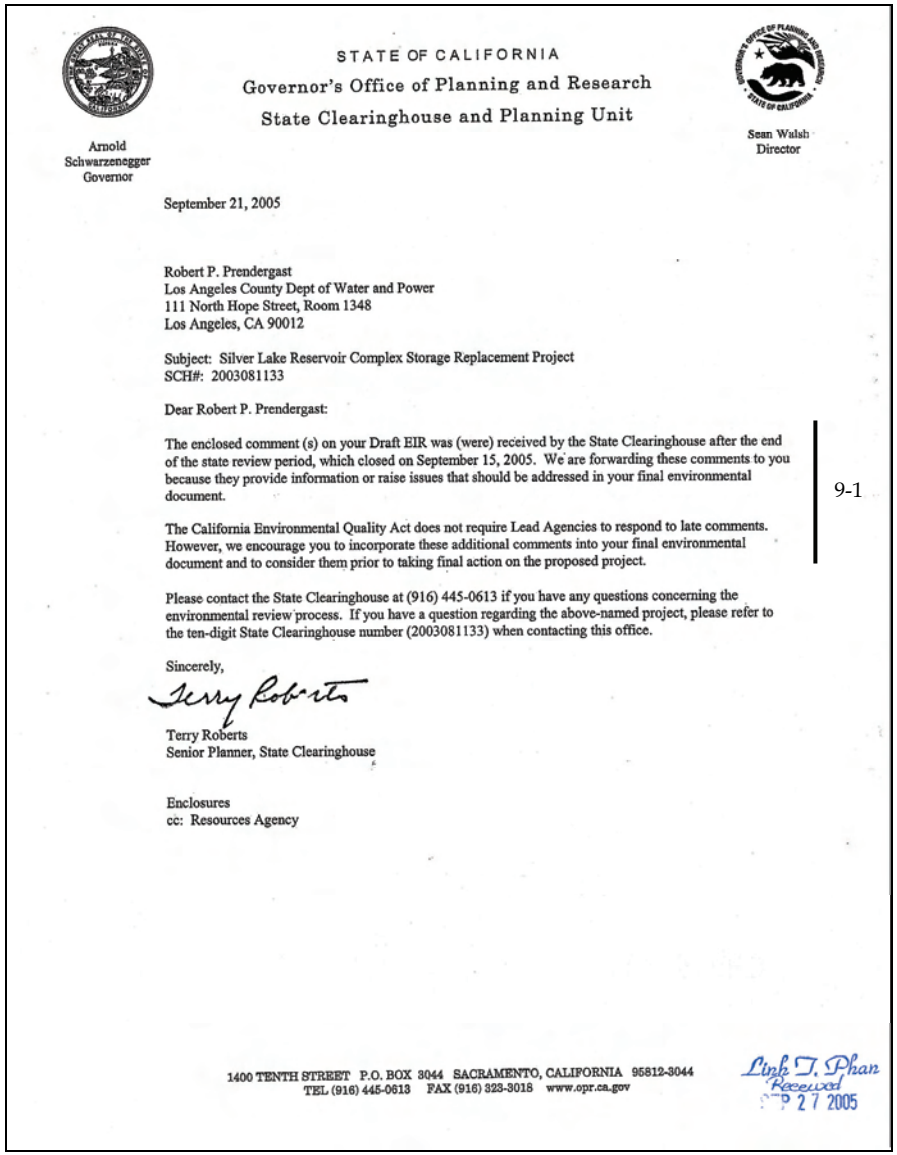
Enc.

Post-it® Fax Note 7671 | Date 9/20 | # of pages ▶ 1
To ROBERT PRENDERGAST | From CLARICE NASH
Co./Dept. DWP | Co. DPW
Phone # | Phone # (626) 458-5910
Fax # (213) 367-0928 | Fax #

Response to Letter #8

Response to Comment 8-1:
Comment noted.

Comment Letter #9



STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Sean Walsh
Director

September 21, 2005

Robert P. Prendergast
Los Angeles County Dept of Water and Power
111 North Hope Street, Room 1348
Los Angeles, CA 90012

Subject: Silver Lake Reservoir Complex Storage Replacement Project
SCH#: 2003081133

Dear Robert P. Prendergast:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on September 15, 2005. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document. 9-1

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2003081133) when contacting this office.

Sincerely,

Terry Roberts

Terry Roberts
Senior Planner, 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

Linh T. Phan
Received
SEP 27 2005

Response to Letter #9

Response to Comment 9-1:

The attached letter was received by LADWP during the comment period and is included in this Final EIR as Comment Letter #5.

Comment Letter #9

09-21-05 08:35 From-DPLA 9166516289 T-263 P.01/01 F-257

SEP 16 2005

1. Ms. Nadell Gayou
Resources Agency Project Coordinator
Environmental Review Section, DPLA
901 P Street
Sacramento, California 95814

RECEIVED
SEP 21 2005
STATE CLEARING HOUSE

clear
9.15.05
late

2. Mr. Robert P. Prendergast
Los Angeles Department of Water and Power
111 North Hope Street, Room 1348
Los Angeles, California 90012

SCH #2003081133, Notice of Completion and Environmental Document Transmittal for Silver Lake Reservoir Complex Storage Replacement Project, August 2, 2005, Los Angeles County

The Division of Safety of Dams has reviewed the Notice of Completion and Environmental Document for the Silver Lake Reservoir Complex Storage Project. Silver Lake Dam, No. 6-051, is currently under State jurisdiction for safety.

An application, together with plans and specifications, must be filed with the Division for the proposed removal of each of the reservoirs.

Based on the information provided, the proposed construction of the covered storage reservoirs may be under State jurisdiction for safety. Section 6002 and 6003 of the California Water Code define that dams 25 feet or higher having a reservoir storage capacity of more than 15 acre-feet, and dams higher than six feet having reservoir storage of 50 acre-feet or more, are under State jurisdiction.

If the proposed covered storage reservoirs are jurisdictional, a construction application must be filed with the Division for the construction of each reservoir.

All dam safety related issues must be resolved prior to the approval of the applications for the removal or construction of the reservoirs, and the work must be performed under the supervision of a civil engineer registered in California. John L. Vrymoed, Design Engineering Branch Chief, is responsible for the application approval process and can be reached at (916) 227-4660.

If you have any questions, you may contact Office Engineer Chuck Wong at (916) 227-4601 or Regional Engineer Mutaz Mihyar at (916) 227-4600.

Original signed by
David A. Gutierrez
David A. Gutierrez, Chief
Division of Safety of Dams
(916) 227-9800

Comment Letter #10

FROM :LCB ASSOC FAX NO. :8182428368 Sep. 27 2005 12:52PM P1

CEMETERY ENGINEERING,
PLANNING AND DEVELOPMENT

& ASSOCIATES, INC.

436 WEST COLORADO BLVD., SUITE 215
GLENDALE, CALIFORNIA 91204-1568
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1347 TAVERN ROAD # 6
ALPINE, CALIFORNIA 91901
Website: www.lcb-inc.com

September 26, 2005

VIA FACSIMILE
(213) 367-0928

Mr. Robert Prendergast
Project Manager
Los Angeles Department of Water & Power
111 North Hope Street, Room 1348
Los Angeles, CA 90051

Subject: Draft Environmental Impact Report
Silver Lake Reservoir Complex
Storage Replacement Project

Dear Mr. Liu:

We have had the opportunity to review the above referenced Draft Environmental Impact Report and the Technical Appendixes.

We would like to take this opportunity to share with you the following comments:

As you know, Mount Sinai Memorial Park is the only private property that is directly and wholly adjacent to the proposed development. Further, 74 percent of the 84 acre cemetery faces northerly at a 10 to 15 percent grade, looking directly down onto the proposed development site. Therefore possible negative impacts on the normal daily operations of Mount Sinai are of serious concern to us, as follows:

In section 4.1.1 of the Technical Appendix, the statement that "construction noise may actually be less noticeable"....due to "frequent lawn maintenance operations at the cemetery" is not accurate. Lawn mowing operations at Mount Sinai Memorial Park only occur once a week during the summer months and once every 3 weeks during the winter months. Further, our insurance carriers do not require ear protection for the lawn mower operators since the noise level is substantially below 80 decibels. 10-1

Cemeteries are a very noise-sensitive land use. Instituting a noise monitoring and mitigation program that includes daily contact with Mount Sinai, scheduling and limiting on-going extreme construction noise producers, such as rock crushers, loud machines, etc., during funeral services located in areas in the cemetery where noise impacts are the greatest, would be a welcome mitigation. 10-2

Linh T. Phan
Revd.
SEP 27 2005

Responses to Letter #10

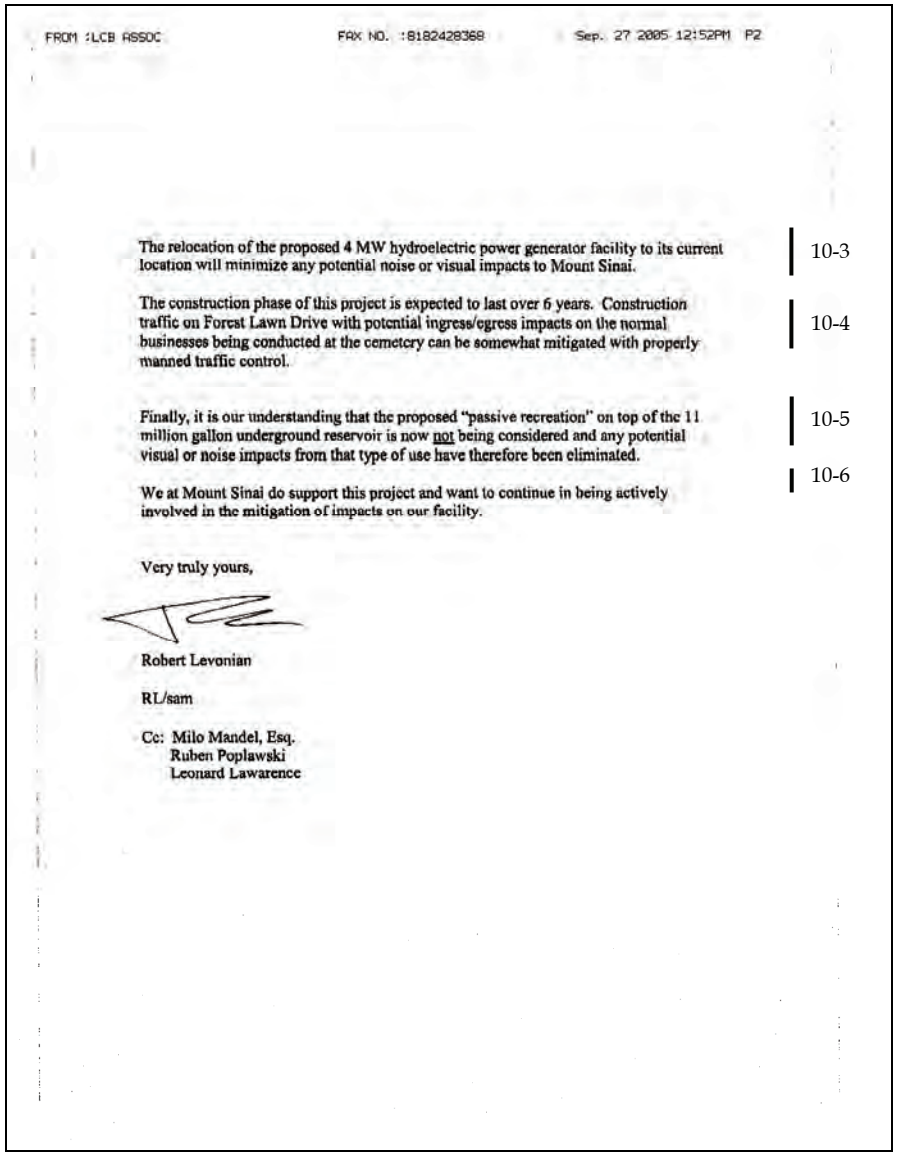
Response to Comment 10-1:

Lawn maintenance activities in Section 4.1.1 of the Noise Study were mentioned in conjunction with freeway noise as making up part of the noise setting in the vicinity of the HWSG site. Lawn maintenance activities at Mount Sinai Memorial Park were not considered to lessen the potential noise impacts caused by the Proposed Project nor were they considered as mitigation for potential noise impacts caused by the Proposed Project.

Response to Comment 10-2:

As described in the noise chapter of the Draft EIR, construction noise levels at the HWSG site have been estimated conservatively high and it is anticipated that Mitigation Measure N-1 will be successful at reducing potential noise impacts to less than significant levels. The LADWP project manager would actively work with Mount Sinai Memorial Park to help ensure that noise impacts are less than significant. Mount Sinai Memorial Park would have the appropriate contact information for the LADWP project manager and would be able to report significant noise levels. If construction noise levels are determined to be significant, LADWP would implement bullet number 1 of Mitigation Measure N-1, which is the institution of a noise monitoring and mitigation program at the HWSG site that will account for perceived as well as actual measured noise levels.

Comment Letter #10



FROM :LCB ASSOC FAX NO. :8182428368 Sep. 27 2005 12:52PM P2

The relocation of the proposed 4 MW hydroelectric power generator facility to its current location will minimize any potential noise or visual impacts to Mount Sinai. 10-3

The construction phase of this project is expected to last over 6 years. Construction traffic on Forest Lawn Drive with potential ingress/egress impacts on the normal businesses being conducted at the cemetery can be somewhat mitigated with properly manned traffic control. 10-4

Finally, it is our understanding that the proposed "passive recreation" on top of the 11 million gallon underground reservoir is now not being considered and any potential visual or noise impacts from that type of use have therefore been eliminated. 10-5

We at Mount Sinai do support this project and want to continue in being actively involved in the mitigation of impacts on our facility. 10-6

Very truly yours,

Robert Levonian

RL/sam

Cc: Milo Mandel, Esq.
Ruben Poplawski
Leonard Lawarence

Responses to Letter #10

Response to Comment 10-3:

Comment noted.

Response to Comment 10-4:

Comment noted. Additionally, a measure intended to mitigate potential impacts related to funeral processions has been added to the Proposed Project. Please see Section 4.0 for new text.

Response to Comment 10-5:

This comment is correct. The Proposed Project does not include any sort of passive recreation at the HWSG site.

Response to Comment 10-6:

Comment noted and appreciated.

3.0 Master Responses

A number of comments received during the public comment period addressed similar issues. To comprehensively respond to these comments, a series of Master Responses has been prepared. This section includes Master Responses that address the following issues or project elements.

Regulating Station – Master Response A

Master Response A addresses the purpose of the regulating station, existing facilities in the vicinity of the grassy area proposed for the regulating station, regulating station details, landscaping in the vicinity of the regulating station, and construction activities in the vicinity of the regulating station.

Segmentation – Master Response B

Master Response B addresses the interconnectivity of the LADWP water system and the relationship between the Proposed Project and the Lower and Upper Reach RSC Replacement Projects and the Headworks Ecosystem Restoration Project.

Cumulative Impacts – Master Response C

Master Response C addresses potential cumulative projects identified by various commenters, including the Silver Lake Residents Association, Committee to Save Silver Lake's Reservoirs, and the City of Los Angeles.

Alternatives – Master Response D

Master Response D addresses project alternatives at the HWSG site, a submerged pipeline alternative for Silver Lake Reservoir, and Silver Lake community values used to evaluate project alternatives.

SLRC Construction Schedule – Master Response E

Master Response E addresses the timing for various construction activities in the vicinity of the SLRC and explains standard construction scheduling.

3.1 Master Response A – Regulating Station

This response address a variety of comments received on the Draft EIR for the Proposed Project pertaining to the regulating station. The following information includes a discussion of the purpose of the regulating station, a description of the grassy area proposed for the regulating station, and the number of existing LADWP facilities in the area; additional details about the regulating station, including the number of hoods and hatches and the percentage of grassy area to be dedicated to the regulating station, a discussion of landscaping in the vicinity of the regulating station, and clarification concerning the construction schedule for activities that will take place in the vicinity of the regulating station.

3.1.1 Purpose of Regulating Station

A regulating station to accompany the bypass pipeline is needed to reduce water pressure from the reservoir at the HWSG site to areas of the distribution system to avoid over-pressurizing that portion of the distribution system currently being provided from Silver Lake Reservoir.

3.1.2 Existing LADWP Facilities in the Vicinity of the Grassy Area

The grassy area south of the Silver Lake Dam is approximately 34,200 square feet. Within this area are several existing facilities that will be abandoned and removed. These include four 48-inch maintenance access covers (50 square feet) and two concrete pads that measure roughly 10 feet by 16 feet (160 square feet) and 6 feet by 14 feet (84 square feet).

3.1.3 Regulating Station Details

Since the Draft EIR was issued, additional design work has been done for the regulating station that allows for a more detailed description but does not significantly deviate from the description provided in Chapter 2 of the Draft EIR. Below is the current description of the various below- and aboveground facilities associated with the regulating station.

Belowground Facilities

The regulating station would be housed in a vault approximately 45 feet long by 25 feet wide by 14 feet deep that would be buried and replanted with grass. Access to the vault would be either from two 3-foot-by-3-foot steel hatches or from two 48-inch-diameter lids on each end of the vault. Within the footprint of the vault, there will be eight 6-inch-diameter gate caps. The two regulating station isolation valve actuators will be housed in a buried 48-inch-diameter by 14-foot-deep can (cylinder structure) and have top access. Just south of the regulating station, the bypass valves would be housed in a buried vault approximately 25 feet long by 15 feet wide by 12 feet deep with access either from a 3-foot-by-3-foot steel hatch or from a 48-inch-diameter lid. Within the footprint of this vault, there will be five 6-inch-diameter gate caps. As a part of the bypass valve appurtenance, there will be a 48-inch maintenance access cover on West Silver Lake Drive. On the existing trunk line, there will be isolation valves that will be housed in a buried vault approximately 14 feet long by 15 feet wide by 12 feet deep with access from a 48-inch-diameter lid. Within the footprint of this vault, there will be two 6-inch-diameter gate caps. In addition, there would

be one 48-inch-diameter by 14-foot-deep can for pipe access. Also, there will be three additional 6-inch gate caps for the air/vacuum valves. In summary, there will be three vaults, which will be buried and replanted with grass. There will be 8 hatches/lids and 18 gate caps. All hatch/lid and vault dimensions are approximate, and all hatches/lids and gate caps would be flush to the ground.

Aboveground Facilities

Anticipated aboveground facilities include two ventilation hoods (4 feet in diameter and 3 feet high), four ventilation standpipes (1 foot in diameter and 3 feet high), two air vacuum valves (2 feet wide and 3 feet high), a control cabinet (2 feet long by 4 feet wide and 6 feet high), and a power pedestal (2 feet long by 2 feet wide and 6 feet high). All dimensions are approximate. These aboveground facilities would occupy an additional approximately 44 square feet. However, the standpipes, hoods, and vacuum valves would likely be located near or on the sidewalk; and the control cabinet may be located near the existing chlorination building.

Regulating Station Facility Summary

The grassy area south of Silver Lake Dam is approximately 34,200 square feet. Of this, less than one-half of 1 percent would be utilized by regulating station facilities. The approximate square footage taken up by the proposed hatches/lids and gate caps is approximately 104 square feet. These facilities would be distributed throughout the grassy area in approximately the same location as the existing maintenance access covers and concrete pads that would be removed, which total approximately 294 square feet. The aboveground facilities would occupy an additional approximately 44 square feet, some of which may be located near or on the sidewalk. Consequently, a net gain of approximately 146 square feet of grassy area would be realized by removing existing facilities and constructing the regulating station.

3.1.4 Landscaping in the Vicinity of the Regulating Station

Photo 10 in Figure 14-9 in Chapter 14, Visual Resources, of the Draft EIR shows the area proposed for the regulating station. As shown, the grassy area is largely treeless, although surrounded by trees. The southern jacking pit for the bypass pipeline would be located in an area surrounded by trees where West Silver Lake Drive makes a 90-degree turn. Figure 2-6 in Chapter 2, Project Description, of the Draft EIR shows the proposed regulating station draft site plan, the location of the southern jacking pit, and the proposed bypass pipeline connecting to the regulating station and the existing trunk line. Based on these figures, it is unlikely that regulating station construction would require the removal of any trees. However, it is possible that the southern bypass pipeline jacking pit and bypass pipeline construction would require some tree removal. The potential removal of trees in the vicinity of the regulating station is addressed in Section 14.3.3.2 of the Draft EIR, Measures Included as a Part of the Proposed Project, which states:

- The areas where the jacking and receiving pits would be located would be restored to their original condition at the completion of construction.
- The surface of the area where the regulating station and associated facilities are located would be restored to its original grade, the lawn would be re-established, and any trees

or shrubs that may have required removal would be replaced as practicable given the location of new underground facilities.

3.1.5 Construction Activities in the Vicinity of the Regulating Station

As described in Chapter 2 of the Draft EIR, three separate construction activities for the SLRC SRP will occur in and around the grassy area south of the Silver Lake Dam where the regulating station would be located. Between October 2007 and April 2008, activities related to removing Silver Lake Reservoir from service would occur. In the vicinity of the regulating station, these activities would include installing valves on the existing outlet line just south of Silver Lake Dam. Regulating station construction itself is anticipated to occur between April and November 2009. Between May and July 2013, activities related to removing Ivanhoe Reservoir from service would occur. This would involve cutting and plugging the existing 60-inch Silver Lake bypass pipeline just south of the Silver Lake Dam, east of the (then) new regulating station.

From May 2008 to March 2009 and December 2009 to April 2013, no construction activity is anticipated to occur in the grassy area south of Silver Lake Dam. During these time periods, the grassy area would be restored to its original or similar condition and be available for normal use.

3.2 Master Response B – Segmentation

This response addresses the comments received on the Draft EIR for the Proposed Project indicating that LADWP has not included all projects related to the SLRC SRP in the Draft EIR. Specifically, at the HWSG site, some commenters have stated that all projects affecting the HWSG site, including the Proposed Project, the Upper Reach River Supply Conduit (RSC) Project, the Lower Reach RSC Project, and the United States Army Corps of Engineers (USACE) Headworks Ecosystem Restoration Project should be addressed in the same EIR. Similarly, at the SLRC, commenters have stated that all LADWP projects in the vicinity, including the Lower Reach RSC Replacement Project, should be addressed in the EIR. These commenters have concluded that because LADWP has not addressed all these projects in the EIR for the SLRC SRP, LADWP has segmented the environmental review in an attempt to minimize the combined impact of these projects.

The CEQA Guidelines (Section 15378) define a project as "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." LADWP believes that it has, with due diligence, described and evaluated the whole of the SLRC SRP in the Draft EIR and this Final EIR. An agency is not permitted to segment (or "piecemeal") a project into small parts to avoid fully disclosing environmental impacts. LADWP has described the whole of its action for the Silver Lake Reservoir Complex Storage Replacement Project and has not segmented the project into smaller parts to avoid fully disclosing environmental impacts.

This Master Response addresses those projects identified by the commenters as related to the SLRC SRP and discusses how each of those projects are, in fact, separate projects, with different purposes, unrelated project descriptions, and dissimilar needs.

CEQA Guidelines Section 15165 state that "where one project is one of several similar projects of a public agency, but is not deemed a part of a larger undertaking or a larger project, the agency may prepare one EIR for all projects, or one for each project, but shall in either case comment upon the cumulative effect." Because of the dissimilarities in project purposes, descriptions, and schedules, LADWP determined it to be most appropriate to prepare a separate EIR for each individual project while noting that other utility or land development projects that may be seemingly related to the Proposed Project have their own purpose and independent utility and therefore should be evaluated in a separate CEQA analysis. Cumulative impacts of other projects, however, are appropriately and thoroughly considered in the context of the Proposed Project in Chapter 16 of the Draft EIR.

The interconnectivity of the LADWP water system is discussed below in conjunction with the Proposed Project and the Lower and Upper Reach RSC. Following that is a discussion of the Proposed Project in conjunction with the Headworks Ecosystem Restoration Project.

3.2.1 Water System Interconnectivity, the SLRC SRP, and the Upper and Lower Reach RSC

The entire LADWP water system is interconnected. To adequately describe and evaluate potential impacts of replacing or upgrading components of the system, certain parts such as the SLRC SRP, the Upper Reach RSC, and the Lower Reach RSC are evaluated separately.

The LADWP interconnects otherwise unrelated system components when feasible to enhance system reliability and operational flexibility for reasons that include:

- Decreased susceptibility to wide-spread outages due to earthquakes and natural disasters
- Increased flexibility to conduct routine system maintenance and repairs
- Increased flexibility for future or unforeseen operational needs

The existing RSC is a major water transmission pipeline in the LADWP water system. The existing pipeline has provided over 50 years of continuous service to the City of Los Angeles, but its reliability and capacity are near its design life limits.

Because of differing system requirements and operational and maintenance needs between the northern and southern sections of this 13.7-mile-long pipeline, LADWP has divided the RSC into two parts (Upper Reach and Lower Reach), each with a logical starting point and point of terminus. The Lower Reach extends from the HWSG site to the Ivanhoe Reservoir in the Silver Lake neighborhood of Los Angeles. The replacement of the Lower Reach RSC would involve the construction of approximately 37,400 linear feet of underground pipeline and appurtenant structures. As part of the Lower Reach RSC Project pipeline construction, a regulator station and connecting piping also would be built underground inside a vault at the HWSG site. The Upper Reach RSC extends from the North Hollywood Pump Station to the HWSG site. The replacement of the Upper Reach RSC would involve construction of approximately 40,300 linear feet of pipeline.

Although the SLRC and the RSC will be interconnected as parts of the LADWP potable water distribution system, they serve entirely different functions within the LADWP water distribution system. The purpose of the SLRC SRP is to ensure compliance with the federal Long Term 2 Enhanced Surface Water Treatment Rule and to facilitate LADWP's conversion to chloramines to comply with the federal Stage 2 Disinfection Byproduct Rule by providing

for covered potable water storage and to provide the necessary storage and delivery infrastructure to maintain adequate water distribution system capacity and pressure. The main purpose of the Lower Reach RSC project is to accommodate higher water pressure, as required by the California Department of Health Services, in a pipeline that is at the end of its design life. The main purpose of the Upper Reach RSC project is to convey additional water to meet future needs of the City.

The cumulative impacts of the SLRC SRP with the Lower Reach RSC Replacement Project and the Upper Reach RSC Replacement Project are addressed in Draft EIR Chapter 16.

3.2.2 Headworks Ecosystem Restoration Project

LADWP and USACE are jointly considering ecosystem restoration alternatives at the HWSG site. USACE is preparing a feasibility analysis to evaluate a variety of ecosystem restoration opportunities at the HWSG site. These opportunities include, but are not limited to, the following: (1) environmental restoration including development of a wetland or restoration of riparian habitat and (2) development of passive recreation opportunities to complement nearby parks and facilities. USACE is investigating feasible opportunities at the HWSG site; but the feasibility of a project has not yet been determined, no project has been proposed for construction, and no funding beyond the feasibility analysis has been identified.

The Headworks Ecosystem Restoration Project would be located at the HWSG site. LADWP would jointly sponsor the Headworks Ecosystem Restoration Project with USACE. However, the Headworks Ecosystem Restoration Project and the SLRC SRP are not interrelated; either project could proceed without the other. The fact that the two projects would potentially occur in the same proximity does not indicate that they are part of the same project. The potential impacts of the Headworks Ecosystem Restoration Project, however, are addressed as a cumulative project in Chapter 16 of the Draft EIR.

3.2.3 Conclusion

Several projects exist in the vicinity of the SLRC SRP that are under consideration and may be perceived as having some relation to the SLRC SRP. However, each of these projects has an independent project description, purpose, and need; and each of these projects is or will be evaluated in a comprehensive environmental document consistent with CEQA Guidelines. As required by CEQA, the potential impacts of these projects in conjunction with the Proposed Project have been considered in the cumulative impacts analysis for the SLRC SRP. Because LADWP has defined the "whole" of the SLRC SRP in the project description and has evaluated the potential impacts of the SLRC SRP and other projects appropriately and consistent with CEQA Guidelines, LADWP is certain that segmentation does not exist in the SLRC SRP Environmental Impact Report.

3.3 Master Response C – Cumulative Impacts

This response addresses the comments received on the Draft EIR for the Proposed Project pertaining to cumulative impacts; this response also provides additional cumulative project information that was previously unavailable.

The CEQA Guidelines (Section 15130) state that "an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." A cumulative impact "consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." Further, an EIR "should not discuss impacts which do not result in part from the project evaluated in the EIR."

For a lead agency to prepare a cumulative impacts analysis, the lead agency must provide either: (1) a "list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency" or (2) a "summary of projections contained in an adopted general plan or related planning document…which described or evaluated regional or areawide conditions contributing to the cumulative impact." The CEQA Guidelines state that when using a list such as in number 1, above, "factors to consider when determining whether to include a related project should include the nature of each environmental resource being examined, the location or the project and its type." Additionally, it is the responsibility of the lead agency to "define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used."

Based on the above guidance, LADWP prepared the cumulative impacts analysis contained in Chapter 16 of the Draft EIR. LADWP determined that it was most appropriate to provide a list of projects producing related or cumulative impacts; both LADWP projects and projects proposed by other agencies were compiled. Because potential impacts associated with the SLRC SRP would occur almost exclusively during construction, LADWP looked for other construction projects that would occur in the same project vicinity and during the same timeframe as construction for the SLRC SRP. Potential projects that may result in cumulative impacts were identified separately both for the HWSG site as well as for the SLRC because the two sites are geographically separated; the timeframe for projects near the two sites were focused on the construction timeframe for that particular site. Specifically, construction projects near the HWSG site during the period of January 2007 through April 2013 were evaluated, as were construction projects in the vicinity of the SLRC from May 2007 through November 2009 and May through July 2013.

To determine the geographic extent for potential cumulative projects, the potential impacts for each of the resource areas evaluated in the Draft EIR were reviewed. Ultimately it was determined that potential traffic impacts should guide the geographic extent of potential cumulative projects, as they represent the most far-reaching impacts.

3.3.1 Potential Cumulative Projects Identified by the SLRA and CSSLR

The Silver Lake Residents Association (SLRA) provided a list of public works projects that will be ongoing in the project vicinity. Similarly, the Committee to Save Silver Lake's Reservoirs (CSSLR) identified 16 potential projects in the vicinity of the SLRC that it felt should be addressed in the EIR for the SLRC SRP. Following is the list of projects identified by the SLRA and CSSLR, a brief overview of each project, and a cumulative impact evaluation for each project.

3.3.1.1 Hyperion Bridge Retrofit and Rehabilitation

This project is addressed on page 16-6 of the Draft EIR. Although the Hyperion Avenue Bridge Retrofit and Rehabilitation Project (Hyperion Avenue Bridge RRP) is not in the immediate vicinity of the SLRC, it is located within the community of Silver Lake and, as such, was included in the cumulative impacts analysis. It was determined that construction of the Hyperion Avenue Bridge RRP would overlap with the Proposed Project for approximately 18 months, between May 2007 and October 2008. Potential cumulative impacts for the Hyperion Avenue Bridge RRP were identified for Earth Resources, Water Resources, Biological Resources, Traffic and Transportation, and Air Quality. With mitigation, potential cumulative impacts to Earth Resources, Water Resources, and Biological Resources were determined to be less than significant. Potentially significant cumulative impacts after mitigation resulting from the Hyperion Avenue Bridge RRP and the Proposed Project were identified for Traffic and Transportation and Air Quality.

3.3.1.2 DWP Lower Reach River Supply Conduit Project

This project is addressed in Chapter 16 of the Draft EIR. Portions of the Lower Reach RSC would be constructed in the vicinity of the HWSG site and the SLRC. Construction of the Lower Reach RSC Project would likely overlap with Proposed Project construction at the HWSG site in 2007 and 2008. With mitigation, potential cumulative impacts to Earth Resources and Water Resources were determined to be less than significant at the HWSG site. Potentially significant cumulative impacts after mitigation resulting from the Lower Reach RSC and the Proposed Project at the HWSG site were identified for Traffic and Transportation, Noise, and Air Quality. Construction of the Lower Reach RSC would likely overlap with Proposed Project construction at the SLRC for approximately 5 months, from May to September 2007. With mitigation, potential cumulative impacts to Earth Resources and Water Resources were determined to be less than significant. Potentially significant cumulative impacts after mitigation resulting from the Lower Reach RSC and the Proposed Project at the SLRC were identified for Traffic and Transportation, Noise, and Air Quality.

3.3.1.3 DWP Silver Lake Boulevard Trunkline Project

The LADWP Silver Lake Trunk Line Slip Lining Project is part of ongoing maintenance performed by LADWP and would involve slip lining the existing pipeline in Coronado Street by adding 36-inch-diameter, high-density polyethylene pipe inside an existing pipeline. Excavation pits would be placed approximately every 500 feet along the pipeline alignment. Phase 1 of the project would be constructed on Coronado Street beginning just south of Bellevue Avenue to just south of Sunset Boulevard. Phase 1 is scheduled to begin in January 2006 and end in May 2006. Because Phase I of the Silver Lake Trunk Line Slip Lining Project is both outside the potential impact area for the Proposed Project and would be completed before construction for the Proposed Project begins, it was not included in the cumulative impacts analysis. The Silver Lake Trunk Line Slip Lining Project includes a speculative Phase II and Phase III. These additional phases would move forward based on testing during Phase I to determine if slip lining is needed. Because these phases are speculative and there is no additional information available to assess impacts, they were not included in the cumulative impacts analysis.

3.3.1.4 DWP Small Main Cement Lining Project

The LADWP Small Main Cement Lining Project is part of the ongoing maintenance performed by LADWP and involves lining a pipeline with concrete approximately from the intersection of Fletcher Boulevard northward onto Glendale Boulevard. This project is anticipated to be constructed between September 2006 and March 2007. The project would be completed before the start of construction for the SLRC SRP and, therefore, was not included in the cumulative impacts analysis.

3.3.1.5 LA City College/Northeast Campus

This project would be constructed at the southeast corner of Fletcher and San Fernando Road, beginning in March 2006 and extending through February 2008. Because this project is outside the Proposed Project impact area, it was not included in the cumulative impacts analysis.

3.3.1.6 Silver Lake Branch Library

This project is addressed on page 16-6 of the Draft EIR. Juliana Cheng (the contact name provided by the CSSLR) was contacted prior to the release of the Draft EIR. The information provided in the Draft EIR was the best available information at the time the Draft EIR was published, and no significant change in that information has occurred since that time. Therefore, the conclusion in the Draft EIR that insufficient information exists to evaluate the Silver Lake Branch Library as a cumulative project is unchanged and considered valid.

3.3.1.7 West Silver Lake Project for $450,000

Because no details are available about this project, no cumulative impact analysis is possible.

3.3.1.8 Northeast Interceptor Phase II

The Northeast Interceptor Sewer Phase II is part of the City of Los Angeles Department of Public Works (LADPW), Bureau of Sanitation's Integrated Resources Plan (IRP). This project is the second phase of a three-phase project to upgrade miles of sewer lines within the City of Los Angeles. The Northeast Interceptor Sewer Phase II (NEIS II) was considered during preparation of the Draft EIR. At that time, it was believed that related impacts would be outside the vicinity of impacts associated with the Proposed Project and was not included in the cumulative impacts analysis. According to a letter received from the LADPW (Appendix B), however, if the Western Alignment for the NEIS II is selected, some increase in traffic may occur on streets in the project vicinity. These streets include Fletcher Avenue and Riverside Drive. Several alignments for NEIS II are being considered by LADPW; only the Western Alignment, if selected, would potentially result in cumulative impacts with the Proposed Project.

Fletcher Avenue and Riverside Drive are in the vicinity of potential SLRC SRP traffic impacts; the intersection of Fletcher Avenue and Riverside Drive is one of the intersections analyzed for the Proposed Project in the Draft EIR. The Draft EIR shows that the intersection of Riverside Drive and Fletcher Avenue is anticipated to operate at an unacceptable level of service in the year 2013, without the Proposed Project. The Proposed Project is anticipated to have a significant impact at the intersection of Riverside Drive and Fletcher Drive during

the PM peak hour (Table 9-11). Mitigation Measure TT-2 (elimination of truck trips between 4:00 p.m. and 6:00 p.m.) was identified to reduce this impact to less than significant.

The NEIS II would be constructed using man-entry tunneling methods with interspersed shaft sites for access, such that in-street construction impacts would be minimal. Traffic and transportation impacts would be largely limited to construction traffic to and from the shaft sites. Although the NEIS II would be located along Riverside Drive at Fletcher Avenue, the tunnel would be underground; and there are no shaft sites located near Riverside Drive and Fletcher Avenue. Given the location of the shaft sites along the NEIS II Western Alignment, there is ample freeway access both north and south of Riverside Drive and Fletcher Avenue. Therefore, it is unlikely that NEIS II construction traffic would utilize Riverside Drive and Fletcher Avenue; and no temporary cumulative traffic impact from the NEIS II in conjunction with the SLRC SRP is anticipated.

3.3.1.9 Glendale Freeway Terminus Project

The State Route 2 (SR-2) Freeway Terminus Improvement Project (SR-2 FTIP) is addressed on page 16-5 of the Draft EIR. Because this project is still in the planning stages and an environmental document has not yet been prepared, a minimum of information was available with which to prepare a cumulative impact analysis. Nevertheless, it was determined that, based on the best available information, some construction activities for the Proposed Project and the SR-2 FTIP may overlap. With mitigation proposed for the SLRC SRP and assumed to be required for the SR-2 FTIP, potential cumulative impacts to Earth Resources, Water Resources, and Biological Resources were determined to be less than significant. Potentially significant cumulative impacts after mitigation resulting from the SR-2 FTIP and the Proposed Project were identified for Traffic and Transportation and Air Quality.

3.3.1.10 Los Angeles River "Fletcher Node"

The Los Angeles River Revitalization Master Plan process is developing and considering alternatives for the entire River corridor, which is generally defined as 250 feet on each side of the River throughout a 32-mile reach. Within this area, the consultant team is charged with identifying five specific "nodes" for focused efforts to develop and consider alternatives for more intensive modifications. Initial selection of the nodes is scheduled to occur in March 2006 with a final report on the nodes due November 2006. Therefore, because the Fletcher node has not been positively selected or designed, it was not included in the cumulative impacts analysis for the SLRC SRP. The Los Angeles River Revitalization Plan effort includes the preparation of a Program EIR. Individual projects will be subject to future project-level environmental analysis.

3.3.1.11 Taylor Yard Park State Park and High School Development

Taylor Yard is a 247-acre former rail yard located along the Los Angeles River in the communities of Cypress Park and Glassell Park, between State Routes 2 and 110. Taylor Yard includes a parcel owned by California State Parks, which is in the design phase for a State Park. Taylor Yard also includes a parcel owned by the Los Angeles Unified School District, which acquired the property for a future high school site and other compatible uses. Taylor Yard is not located in the community of Silver Lake and is outside the potential

impact area for the SLRC SRP. Therefore, future development of Taylor Yard was not considered during the cumulative impact analysis for the SLRC SRP.

3.3.1.12 I-5 Northbound Carpool Lanes

It is unknown what project is specifically being referenced. A review of the California Department of Transportation (Caltrans) District 7 (Ventura and Los Angeles Counties) High Occupancy Vehicle (HOV), or carpool lane, projects does not reveal plans to construct northbound HOV lanes in the vicinity of the SLRC SRP. A map issued in November 2005 indicating the status of HOV routes in Caltrans District 7 does not show any plans for HOV lanes along I-5 between I-710 and SR-134. Therefore, insufficient information exists to evaluate the potential impacts of I-5 Northbound Carpool Lanes construction in conjunction with construction of the Proposed Project.

3.3.1.13 Silver Lake Boulevard Retaining Wall

This LADPW project would replace approximately 300 feet of collapsed retaining wall on Silver Lake Boulevard as well as the sidewalk in that area and is anticipated to occur between March and June 2006. Based on this construction schedule, the Silver Lake Boulevard Retaining Wall Project would be complete before construction begins for the Proposed Project. Therefore, this project was not included in the cumulative impacts analysis.

3.3.1.14 Silver Lake Master Plan Implementation Phase II

This project would complete the portion of the perimeter path around the SLRC along Silver Lake Boulevard and is anticipated to occur between May and November 2006. Based on this construction schedule, Silver Lake Master Plan Implementation Phase II is anticipated to be complete before construction begins for the Proposed Project. Therefore, this project was not included in the cumulative impacts analysis.

3.3.1.15 1st Street Trunkline

The LADWP 1st Street Trunk Line Project would involve construction of approximately two miles of 60-inch diameter trunkline to provide a new east-west connection between two existing water lines. The trunkline would be located between the intersection of Van Ness Avenue and 1st Street and the intersection of Beverly Boulevard and Dillon Street in the City of Los Angeles. Construction for the 1st Street Trunk Line Project would begin in approximately June 2006 for 12 to 16 months. Although construction of the 1st Street Trunk Line Project would potentially overlap with Proposed Project construction for up to 5 months, the project is located well south of the potential impact area for the SLRC SRP. Therefore, the 1st Street Trunk Line Project was not included in the cumulative impacts analysis.

3.3.2 Potential Cumulative Projects Identified by the City of Los Angeles

Appendix B includes a letter provided by the Environmental Management Group of the LADPW. This comment letter was received outside the public comment period and, as such, is not included in the responses to comments. However, the letter references two projects that may have cumulative impacts in conjunction with the SLRC SRP: the Glendale-Burbank Interceptor Sewer and the Northeast Interceptor Sewer Phase II. The Northeast

Interceptor Sewer Phase II was also identified by the SLRC and CSSLR as a potential cumulative project and is discussed above.

The letter provided by LADPW indicates that the Glendale-Burbank Interceptor Sewer (GBIS) is mentioned on page 16-5 of the Draft EIR but that an environmental document has not yet been prepared. LADPW states that impacts associated with the GBIS are addressed in the City's IRP EIR. At the time the Draft EIR for the SLRC SRP was prepared, it was believed that construction of the GBIS would not begin until sometime in 2013. It is now estimated that construction of the GBIS may occur between 2011 and 2015, in which case GBIS construction could overlap with construction of the SLRC SRP at the HWSG site for up to 2 years (2011 through 2013).

The IRP EIR shows that one of several alternatives for the GBIS is a southern alternative that traverses the southern edge of the HWSG site. Similar to construction for the NEIS II, construction of the GBIS would be conducted in underground tunnels, with interspersed shaft sites for access. The nearest shaft site for the southern GBIS alignment is at Travel Town, east of the HWSG site. GBIS construction for the southern alternative is not anticipated to directly disrupt traffic on Forest Lawn Drive or any of the other streets or intersections in the vicinity of the HWSG site. However, if the southern alternative is selected, GBIS construction may generally increase construction traffic in the project vicinity. Given that the intersection of Forest Lawn Drive and Zoo Drive was found in the Draft EIR for the SLRC SRP to have potentially adverse traffic impacts, any additional construction traffic at this location may be cumulatively significant. This finding is consistent with the traffic and transportation cumulative impacts analysis included in the Draft EIR for the SLRC SRP, which concluded that because construction of multiple cumulative projects may overlap with the Proposed Project, it is possible that significant temporary cumulative impacts related to traffic and transportation may remain after mitigation.

3.3.3 Conclusion

This additional cumulative impacts analysis shows that the projects identified by the SLRA and CSSLR were considered and included in the cumulative impacts analysis in Chapter 16 of the Draft EIR as appropriate. Additional information, available since the Draft EIR was released, also has been considered and added to the cumulative impacts analysis. Consideration of this new information has not resulted in the identification of new significant cumulative impacts from the SLRC SRP in conjunction with other construction projects in the project vicinity and timeframe and does not change the conclusions presented in the Draft EIR.

3.4 Master Response D – Alternatives

This response addresses the comments received on the Draft EIR for the Proposed Project from Latham & Watkins on behalf of the Forest Lawn Memorial-Park Association (Forest Lawn) regarding the alternatives analysis. In part, Forest Lawn is concerned that only one alternative (the Proposed Project) includes the HWSG site. Forest Lawn also requested that a description of the Silver Lake Master Plan community values be included in the alternatives analysis.

This response also addresses a comment received on the Draft EIR for the Proposed Project from the CSSLR regarding a submerged pipeline alternative for the SLRC.

As described in Chapter 15 of the Draft EIR, CEQA Guidelines Section 15126.6 state that "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." Additionally, an EIR "is not required to consider alternatives which are infeasible…Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts."

3.4.1 Storage Alternatives at the HWSG Site

Generally, alternatives for the Proposed Project can be summed up as being either: (1) water treatment options or (2) water storage options. Chapter 15 of the Draft EIR describes a number of alternatives that fit into these two categories, which include water treatment at the SLRC, water storage at the SLRC, and offsite water storage. During the lengthy search for a proposed project, LADWP investigated offsite water storage at locations other than the HWSG site, including Taylor Yard, the Los Angeles Zoo, and Griffith Park. Additionally, LADWP investigated various water storage options at the HWSG site before determining that the construction of a 110-MG buried reservoir was the best option in terms of operation criteria and hydraulic considerations. Initially, LADWP planned to construct aboveground storage (tanks) and mitigate visual impacts by planting trees. Several tank options were considered, including:

- Construction of four 390-foot-diameter by 40-foot-high tanks that would occupy approximately three-quarters of the east side of the HWSG site.
- Construction of two 450-foot-diameter, one 400-foot-diameter, and one 280-foot-diameter by 40-foot-high tanks to be located on the south easterly side of the HWSG site. The use of different size tanks would take advantage of the shape of the property.
- Construction of a 1,415-foot by 150-foot by 1,485-foot by 370-foot by 40-foot-high reservoir located on the south easterly side of the HWSG site.

These options at the HWSG site were evaluated by LADWP water planning and operations engineers. Ultimately, they determined that because of hydraulic considerations, operation criteria, and constructability issues, the currently proposed irregularly shaped buried reservoir was the best option for a water storage facility at the HWSG site.

The above three options were not evaluated as potential alternatives in the Draft EIR because significant environmental impacts associated with the Proposed Project would not be avoided. Because LADWP performed a lengthy alternatives evaluation prior to the identification of a proposed project, they were able to select an alternative that had the least potential for significant environmental impacts while meeting the stated objectives for the project. Considering project alternatives in the EIR that would result in greater impacts simply for the exercise of considering more project alternatives is not in keeping with the letter or spirit of CEQA.

3.4.2 Submerged Pipeline Alternative at the SLRC

In its comment letter, CSSLR stated: "There needs to be further assessment of lower impact construction techniques for the bypass line, rather than tunneling under WSLD. The Stone Canyon Reservoir is utilizing a submerged pipeline. If this option was considered, the reasons for not choosing such a technique need to be outlined in this chapter."

LADWP did analyze the two separate options for constructing a submerged pipeline in Silver Lake Reservoir. The first was for a steel pipeline and the second was for a High Density Polyethylene (HDPE) pipeline. Both options would require the draining of Silver Lake Reservoir for an extended period of time and both options would have significant impacts to traffic associated with routing of a trunkline through residential streets to connect to the submerged bypass lines. The HDPE pipeline option also had complications in complying with California Department of Health Services requirements.

During public scoping meetings for this project as well as in public comment letters, concern about draining Silver Lake Reservoir was expressed. Because these alternatives required the draining of Silver Lake Reservoir and caused significant impacts to traffic adjacent to Silver Lake Reservoir, the submerged pipeline alternative was not pursued.

3.4.3 Silver Lake Community Values

The community values cited by Silver Lake community representatives generally reflect the desire to retain the water views historically provided by Ivanhoe and Silver Lake reservoirs. Another value that can be interpreted from the Silver Lake community representatives is the wish to develop appropriate water system infrastructure while maintaining a large portion of the SLRC as passive open space available for future public access. Other community values that can be interpreted are linked to the goals related to water quality; landscape recreation and open space; pedestrian safety and traffic; and community context, cultural resources, and urban design that are set forth in the Silver Lake Master Plan.

Quantification of the Silver Lake community values identified in the Silver Lake Master Plan is difficult because no explicit statement of these values is provided in the Master Plan but can only be interpreted from that document and related information.

3.5 Master Response E – Construction Schedule

This response addresses the comments received on the Draft EIR for the Proposed Project pertaining to the schedule of construction activities at the SLRC. Additional details about the schedule of construction activities at the SLRC have been provided, if available, as has a short discussion of standard construction scheduling information.

3.5.1 Construction Activities at the SLRC

As shown on page 2-17 of the Draft EIR, construction activities at the SLRC would occur between early 2007 and late 2009 and then again briefly in 2013. Following is additional information related to the schedule for bypass pipeline construction, construction of the regulating station and relief stations, and construction activities related to removing Ivanhoe Reservoir from service.

3.5.1.1 Bypass Pipeline

A commenter noted that there was a gap in the bypass pipeline tunneling schedule, between February and October 2008, and asked what would occur during that time period. As stated in the Draft EIR, the bypass pipeline would occur approximately from May 2007 through April 2009. From June 2007 through February 2008 and from October 2008 through February 2009, soil would be removed during bypass pipeline construction. Time periods when soil is not being removed is when pipe would be placed, so there is no actual gap in the bypass pipeline schedule. However, if there were to be a gap in the construction schedule for an unforeseen reason, the jacking pits would be covered.

3.5.1.2 Regulating Station and Relief Stations

A commenter requested additional information about relief station construction timing. As stated in the Draft EIR, regulating station and relief station construction would occur approximately between April and November 2009. Construction of relief station #1 would take approximately 6 to 7 weeks, while construction of relief station #2 would take approximately 11 weeks. It should be assumed that potential in-street construction impacts for each relief station would occur during the full time period (either 6 to 7 or 11 weeks). Because the contractor selected for construction of the regulating station and relief stations would have discretion in scheduling construction activities, is it not possible at this time to identify specifically when during the larger construction timeframe (April through November 2009) the relief stations would be constructed. See below for additional information regarding standard construction scheduling information.

3.5.1.3 Construction Activities Related to Removing Silver Lake Reservoir from Service

A commenter asked where on the northeast corner of Silver Lake Reservoir would construction take place and when and how long. As stated in the Draft EIR, activities related to removing Silver Lake Reservoir from service would require cutting and plugging a 72-inch pipeline located at the northeast corner of Silver Lake Reservoir. Figure 2-5 shows the location of the pipeline to be cut and plugged. Construction activities required to remove Silver Lake Reservoir from service are anticipated to occur between October 2007 and April 2008. It is not possible at this time to state exactly when the pipeline cut and plug would occur during this time period (see below for standard construction scheduling information), although it is likely that the cut and plug would take approximately 10 weeks.

3.5.2 Standard Construction Scheduling Information

Some commenters requested additional information regarding when specific elements of the Proposed Project would be constructed. For example, when exactly during the construction window for the regulating station and relief stations would in-street construction occur. LADWP hires construction contractors through the bid process to construct many of its projects. Municipal contracts, in general, specify desired cost, quality, and deadlines for civic projects. Because private contractors need to balance their own resources as well as the City's need to reduce its liability for contractor's performance issues, specific procedures and day-to-day timelines for projects are generally left to the contractor. As a result, general construction windows are identified in environmental documents, and worst-case potential impacts are assessed assuming that construction will occur during a longer timeframe.

4.0 Minor Changes and Clarifications to the Draft EIR

This section of the Final EIR contains revisions and clarifications to the Draft EIR resulting primarily from minor project description changes and comments received during the Draft EIR comment period. These revisions do not alter the Draft EIR's conclusions regarding the significance of the Proposed Project's environmental impacts. Text revisions are identified by strikeouts (~~strikeout~~) where text is removed and italics (*italics*) where text is added. Revisions are provided in the same order as the Draft EIR chapters for ease of viewing.

4.1 Draft EIR Executive Summary Changes

Table ES-1 in the Draft EIR includes a comprehensive list of the potential significant impacts by resource area, identifies the mitigation measures to be implemented to reduce the impact below the level of significance, and shows the level of significance after mitigation. Because various minor changes have been made to some of the mitigation measures, Table ES-1 has been reprinted here in its entirety in order to show these changes.

4.2 Draft EIR Chapter 2 Changes

4.2.1 Changes to Draft EIR Section 2.2.3.3

To provide additional project description clarification and in response to comments received on the Draft EIR, the portion of the Project Description that addresses reservoir operation/ maintenance (pages 2-29 and 2-30) has been revised as follows:

Reservoir Operation/Maintenance

It is currently planned to remove Silver Lake Reservoir from service sometime in 2008-2009 while maintaining Ivanhoe Reservoir in service to feed the distribution system. Once removed from service, the water in Silver Lake Reservoir would be considered nonpotable; therefore, Silver Lake Reservoir would be maintained at a lower elevation than Ivanhoe to prevent cross contamination. Silver Lake Reservoir would continue to be maintained at historical operating levels (typically between 440 and 451 feet). Ivanhoe Reservoir would be removed from service approximately 2 months after the storage reservoir at the HWSG site is fully operational, estimated to be July 2013. When Ivanhoe is removed from service, make-up water would be added to Ivanhoe via the service line off the existing line on Armstrong Avenue.~~, which would then flow into Silver Lake.~~

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
Earth Resources (Chapter 4)			
Grading and excavation activities required for construction may result in soil erosion and sedimentation runoff that would have potentially significant impacts. These potential impacts would be mitigated by Mitigation Measure ER-1.	Excavation during construction activities and grading and soil storage at the construction staging area on the east side of Silver Lake Reservoir may potentially result in significant adverse impacts to soil resources, including soil erosion and runoff sedimentation. These potential impacts would be mitigated by Mitigation Measure ER-1.	**Mitigation Measure ER-1: Soil Resources** One or more of the following measures to control soil erosion and sedimentation will be implemented ~~as feasible~~: • The area disturbed by clearing, grading, earth moving, or excavation operations will be as small as feasible to prevent excessive dust. • Pregrading/excavation activities will include watering the area to be graded or excavated before commencement of grading or excavation. Application of water will penetrate sufficiently to minimize fugitive dust during grading activities. • Trucks will be required to have their loads covered going offsite. • Graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved onsite roadways, will be treated to prevent fugitive dust. Treatment will include, but not be limited to, periodic watering and/or roll compaction as appropriate. Watering will be done at least twice daily. • Inactive graded and/or excavated areas will be monitored at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction will be periodically implemented over portions of the construction site that are inactive for over 4 days.	LS

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
		• During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), clearing, grading, earth-moving, and excavation operations will be curtailed to the degree necessary to prevent fugitive dust created by onsite activities and operations from being a nuisance or hazard to offsite properties. • Adjacent streets and roads *impacted by project fugitive dust* will be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads. • A Storm Water Pollution Prevention Plan (SWPPP) will be developed and implemented that will include Best Management Practices (BMPs) to minimize conveyance of sediment into waterways. The SWPPP may include some or all of the following or any other measure necessary: - V-ditches will be constructed above all cut or fill slopes to divert water from newly exposed slope faces. - Straw bale dikes or filter fabric barriers will be located downslope of disturbed areas to act as sediment traps. - Topsoil will be selectively removed, stockpiled, and replaced as a surface medium for revegetation. - Exposed slope faces will be revegetated as soon after construction as possible. - Temporary sedimentation basins will be constructed as necessary.	

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
Existing alluvial materials underlying the reservoir site may prove to be unsuitable foundation materials. Potential impacts would be mitigated by Mitigation Measure ER-2.	Numerous small faults and fractures may be encountered during excavation and tunneling activities at the SLRC. Potential impacts related to these faults would be mitigated by Mitigation Measure ER-2.	**Mitigation Measure ER-2: Geologic Hazards** The following measures will be implemented, as feasible, to mitigate potentially significant impacts resulting from geologic hazards to less-than-significant levels: • Facilities will be designed according to seismic standards as determined by geotechnical and seismic hazard analyses. The analyses will be based on site-specific subsurface investigations and ground motion design recommendations. • Appropriate geotechnical soil testing will be performed during the design phase so that the proposed grading and facilities can be properly designed to meet applicable structural and seismic requirements. • The foundation for the storage reservoir will be founded in competent materials at the site. The results of the site-specific design-level geotechnical and seismic hazard analysis noted above will assist in determining which foundation design and construction methods are implemented at the HWSG site.	LS

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
		• LADWP will file a geotechnical report with the California Division of Safety of Dams (DSOD) as part of the application process for construction of a new reservoir. During construction, ~~both~~ LADWP ~~soils~~ *geotechnical* engineer*s* and inspectors from DSOD will monitor progress. Field checking of foundation and geologic conditions during construction will also ensure that designs and grading accommodate any unusual conditions that may not have been previously discovered. • If adverse slopes are encountered, slope stability will be analyzed; and slope stabilization measures will be established during design to minimize the potential for landslide damage. • Cuts and fill slopes will not exceed a 2:1 (horizontal:vertical) ratio except for cuts directly into bedrock where steeper slopes may be safely obtained. • Analyses of slope stability will be made in areas where cuts into marginal or adversely dipping slopes are required for construction of proposed facilities to minimize the potential for landslide damage.	

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
Water Resources (Chapter 5)			
Short-term impacts to surface water quality could occur during construction at the HWSG site and the SLRC in the event of drainage from precipitation that would potentially result in substantial erosion. Changes in topography and the presence of excavated and/or unprotected soil could all affect stormwater runoff. These potential impacts would be mitigated by Mitigation Measure WR-1.		**Mitigation Measure WR-1: Surface Water Quality** • The project would obtain an NPDES Municipal Stormwater General Construction Permit (General Permit), and comply with all permit requirements. • A~~n~~ SWPPP will be developed and implemented that will include BMPs to minimize conveyance of sediment into waterways. The SWPPP may include some or all of the following or any other measure necessary: - V-ditches will be constructed above all cut or fill slopes to divert water from newly exposed slope faces. - Straw bale dikes or filter fabric barriers will be located downslope of disturbed areas to act as sediment traps. - Topsoil will be selectively removed, stockpiled, and replaced as a surface medium for revegetation. - Exposed slope faces will be revegetated as soon as possible after construction. - Temporary sedimentation basins will be constructed as necessary. • Interim grading and other measures specified by the Los Angeles City erosion control ordinances would be employed to mitigate any short-term flooding due to stormwater.	LS

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
Biological Resources (Chapter 6)			
Construction activities at the HWSG site would potentially result in the loss of the riparian community along the southern edge of the site. This potential impact would be mitigated by Mitigation Measure BR-1.		**Mitigation Measure BR-1: Riparian Habitat at the HWSG Site** To mitigate for the loss of riparian habitat along the south portion of the HWSG site, mitigation will be implemented that will include replacement of riparian areas consistent with anticipated requirements of federal Clean Water Act (CWA) permits and state Section 1600 agreements. Mitigation may be achieved through funding of existing mitigation banks, habitat restoration, or other means acceptable to resource agencies.	LS
Construction activities at the HWSG site would potentially result in the loss of waters of the U.S. and CDFG jurisdictional streambed and bank, which would represent a significant impact. This potential impact would be mitigated by Mitigation Measure BR-2.		**Mitigation Measure BR-2: Jurisdictional Waters** The Proposed Project will obtain and comply with conditions of permits issued from U.S. Army Corps of Engineers (USACE) (CWA, Section 404) and the CDFG (Streambed Alteration Agreement [SAA], Section 1603). The details of mitigation requirements for impacts to jurisdictional waters will be determined through continuing consultation with USACE and CDFG. Mitigation may be achieved through funding of existing mitigation banks, habitat restoration, or other means acceptable to resource agencies.	LS

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
Because portions of the HWSG site have been relatively undisturbed for many years and rare plants may have a reservoir/seed source in adjacent Griffith Park, special-status plant species may be present during areas to be disturbed for construction activities. Potential impacts to these special-status plant species would be mitigated by Mitigation Measure BR-3.		**Mitigation Measure BR-3: Special-Status Plants** Mitigation for potential impacts to special-status plants will include the following: • Preconstruction surveys will be conducted at the HWSG site prior to any ground-disturbing activities, and in the appropriate flowering season for special-status plants. • If rare plants are identified at the HWSG site, then detailed mitigation will be developed in coordination with the appropriate resource agency (CDFG or USFWS), which may potentially include the following: - Exclusion zones where practical to preclude impacts to rare plants - Translocation of seeds, topsoil, and/or plants to areas outside the disturbance footprint - Establishment of new populations in areas that will not be subject to future development, and where populations may be protected and managed in perpetuity - Investment in mitigation bank lands as appropriate to the specific species	LS
Nesting bird species of special concern, consisting of yellow-breasted chat, California horned lark, loggerhead shrike, and burrowing owl, have the potential to nest at the HWSG site and in limited areas at the SLRC. Additionally, ardeids may nest in tall trees at either site. Potential impacts to these species would be mitigated by Mitigation Measure BR-4.		**Mitigation Measure BR-4: Nesting Birds of Special Concern** Preconstruction surveys for nesting special-status birds will be conducted at the HWSG site and the SLRC prior to ground-disturbing activities. Depending on the results of these surveys, the following mitigation measures will be implemented: • All vegetation removal required for the Proposed Project will occur prior to the nesting season for most birds (February to August) to avoid direct impacts to nesting birds.	LS

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
		• Where nests for special-status birds are established within 500 feet of *surface* construction activities, construction will be delayed until (a) fledglings leave the nest and are independent of adults or (b) it is determined by CDFG that no adverse effects are likely to occur to the nest or brood from adjacent construction activities, and a Biological Monitor is provided to conduct construction monitoring to ensure that effects on the nest site or brood do not reach adverse levels. • Construction adjacent to the known heron rookery at Silver Lake will be avoided during the nesting season for herons (February to August).	
Construction activities at the HWSG site and the SLRC may result in impacts to special-status bats when roost sites are located near construction disturbance areas. Potential impacts to these species would be mitigated by Mitigation Measure BR-5.		**Mitigation Measure BR-5: Special-Status Mammals (Bats)** Preconstruction surveys for bat roosts will be conducted at the HWSG site and the SLRC prior to ground-disturbing activities. Where active roosts are identified during these surveys, the following mitigation measures will be implemented: • Within 300 feet of the location of active roosts, ground disturbance and roost destruction would be avoided during the parturition period (March 15 through August 31). • Where this avoidance is not feasible, if potential roosts are identified prior to onset of parturition, roosts may be removed during the evening forage period (within 4 hours after dark) or fitted with one-way exit doors to effectively eliminate and exclude roost.	LS

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
Cultural Resources (Chapter 7)			
The potential for discovery of prehistoric or historical archaeological sites at the HWSG site and the SLRC is considered to be low; however, impacts may be potentially significant if sites are found. Potential impacts would be mitigated by Mitigation Measure CR-1.		**Mitigation Measure CR-1: Archaeological Resources** Potential impacts to cultural resources related directly or indirectly to Proposed Project-related activities ~~shall~~ *will* be reduced to below the level of significance through recovery or treatment of archaeological resources encountered during archaeological site investigations or monitoring of ground-disturbing activities (construction) in areas with the potential to contain archaeological resources. When investigations identify unique archaeological resources as defined in Section 21083.2 of the Public Resources Code (PRC), the site ~~shall~~ *will* be subject to specified requirements for treatment. Where elements of the Proposed Project are expected to require earthmoving, the following program ~~shall~~ *will* be implemented and the requirement duly ~~noted in~~ *incorporated into* Proposed Project plans and specifications: • Retain a qualified archaeologist to implement a monitoring and recovery program in any area identified as having the potential to contain unique archaeological resources. • A qualified archaeologist ~~shall~~ *will* monitor earth-moving activities in areas that are likely to contain unique archaeological resources. The archaeologist ~~shall~~ *will* be authorized to halt construction, if necessary, in the immediate area where buried cultural remains are encountered. Prior to the resumption of grading activities in the immediate vicinity of the cultural remains, the project proponent ~~shall~~ *will* provide the archaeologist with the necessary resources to identify and implement a program for the appropriate disposition as specified by Section 15064.5(e) of the CEQA Guidelines.	LS

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
		• The selected archaeologist ~~shall~~ *will* be required to secure a written agreement with a recognized museum repository regarding the final disposition and permanent storage and maintenance of any unique archaeological resources recovered as a result of the archaeological monitoring. This would also include corresponding geographic site data that might be recovered as a result of the specified monitoring program. The written agreement for the disposition of recovered artifacts ~~shall~~ *will* specify the level of treatment (preparation, identification, curation, cataloging) required before the collection would be accepted for storage. • The selected archaeologist ~~shall~~ *will* attend a preconstruction meeting to provide information regarding regulatory requirements for the protection of unique archaeological resources. Construction personnel ~~shall~~ *will* be trained on procedures to be followed in the event that a unique archaeological resource is encountered during construction. In addition, the archaeologist ~~shall~~ *will* ensure that the preconstruction meeting participants are trained to notify the Los Angeles County Medical Examiner (coroner) within 24 hours of the discovery of human remains. Upon discovery of human remains, there ~~shall~~ *will* be no further excavation or disturbance of the site or any reasonably nearby area suspected to overlie adjacent human remains until the following conditions are met: - The Los Angeles County Medical Examiner has been informed and has determined that no investigation of the cause of death is required; and, if the remains are of Native American origin, the descendants of the deceased Native Americans have made a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98.	

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
		If archaeological sites are encountered during construction of the Proposed Project, an evaluation of significance will be made by the selected archaeologist. Those sites that are determined eligible for listing in the California Register of Historical Resources (CRHR) ~~shall~~ *will* be treated in accordance with one of the three feasible measures described in the "CEQA and Archaeological Resources," CEQA Technical Advice Series: • Capping (covering) the site with a level of soil prior to construction over the site • Incorporating into open space areas of the project site • Excavating where the first two measures are not feasible For eligible sites, the City of Los Angeles ~~shall~~ *will*, prior to construction, implement the applicable treatment plan.	
	Areas at and surrounding the SLRC contain landscaping that contributes to the historic character of the SLRC that may be disturbed or removed during construction. Impacts to this landscaping would result in potentially significant impacts. Potential impacts would be mitigated by Mitigation Measure CR-2.	**Mitigation Measure CR-2: Historic Landscaping Restoration** Landscaping of the 30,000-square-foot, open, grassy area located at the southwest corner of the SLRC, the proposed location of a jacking pit, pipeline, concrete vaults for a regulating station, and other new facilities ~~shall~~ *will* be returned to an appearance approximating preconstruction conditions, insofar as is possible, prior to removal of Ivanhoe and Silver Lake Reservoirs from service to the water distribution system. Where avoidance or transplantation of onsite trees and other vegetation is not possible, the proposed regulating station area (SLRC-2) should be landscaped with mature, healthy trees and plant material of comparable species, in keeping with the historic character and appearance of these portions of the reservoir complex.	LS

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
		In areas where planting of trees and other large vegetation would impede operation of the new facilities, grass will be replanted over the buried structures, approximating the current appearance of the site inasmuch as that is practicable. Insofar as is possible, landforms ~~shall~~ *will* be returned to their preconstruction topography. The *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Cultural Landscapes* should be employed to mitigate potential impacts to the existing landscaping resulting from construction activities. The same mitigation measure ~~shall~~ *will* be employed for impacts related to the removal or degradation of landscaping in the area designated for equipment and material staging (SLRC-1), within the former East Cove area. Landscape rehabilitation will be performed in coordination with the Property Maintenance and Management Plan for the SLRC.	

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
Paleontologic Resources (Chapter 8)			
Earth-disturbing activities at both the HWSG site and the SLRC could potentially reveal paleontologic resources. Potential impacts to paleontologic resources would be mitigated by Mitigation Measures PR-1, PR-2, and PR-3.		**Mitigation Measure PR-1: Paleontologic Resources at HWSG Site and SLRC** Mitigation will include the following measures: • Earth-moving activities that have a potential for disturbing previously undisturbed strata identified as being paleontologically important will be monitored by a paleontologic construction monitor. If fossil remains are encountered, they will be recovered, along with associated specimen data and corresponding geologic and geographic site data. The level of monitoring will reflect the paleontologic importance/impact sensitivity of the rock unit underlying the area of disturbance and the type of earth-moving activity. • If fine-grained strata with a potential for containing microfossils or small fossil remains are encountered, rock/sediment samples will be collected and processed to allow for the recovery of these fossil remains. • If necessary, earth-moving activities will be diverted temporarily around a fossil/sampling locality until the fossil remains/sample has been removed. • If warranted, rock/sediment or fossil samples will be submitted to commercial laboratories for microfossil and pollen identification, or radiometric dating analysis.	LS

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
		• Recovered fossil remains will be prepared to the point of identification, identified by knowledgeable paleontologists, curated, catalogued with Natural History Museum of Los Angeles Vertebrate Paleontology Department (LACMVP) fossil specimen and locality numbers, and transferred to the LACMVP for permanent storage. • A final technical report of results and findings will be prepared by the paleontologist. **Mitigation Measure PR-2: Paleontologic Resources at the HWSG Site** Monitoring at the HWSG site will be conducted on a spot-check basis once excavation for the reservoir and any ancillary facility has reached a depth 5 feet below grade in the stream channel deposits. If fossil remains are encountered by excavation, the monitoring level will be increased to full time. **Mitigation Measure PR-3: Paleontologic Resources at the SLRC** Paleontologic monitoring of construction at the SLRC will be conducted during the periods that ground-disturbing activities are ongoing at depths greater than 5 feet, and are occurring within Quaternary alluvium or Miocene marine sediments. With the exception of the excavations for the cut-and-plug operations, expected to occur only within artificial fill, all excavations to depths greater than 5 feet may affect paleontologically sensitive sediments. Therefore, these excavations will be monitored *except* in cases where it can be conclusively demonstrated that artificial fill occurs at depths exceeding 5 feet; and that the excavations are, therefore, occurring in sediments with no paleontologic sensitivity. Monitoring will be conducted by a trained paleontologic monitor under the direction of a professional paleontologist. Monitoring will consist of inspection of debris and backdirt generated by excavations, as well as exposed sediment profiles when safely accessible. Boring and drilling operations will be spot monitored ~~at least once a day~~, and will be full-time monitored should fossils be encountered. All other excavations in paleontologically sensitive sediments will be subjected to full-time paleontologic monitoring.	

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
Traffic and Transportation (Chapter 9)			
Construction traffic at the HWSG site would potentially have a significant adverse impact at the intersection of Forest Lawn Drive and Zoo Drive. Potentially significant impacts would be mitigated by Mitigation Measure TT-1.		**Mitigation Measure TT-1: Forest Lawn Drive and Zoo Drive** The *project work* schedule ~~of the construction workers~~ will be ~~staggered~~ *arranged* to minimize the impact at this location.	S
	At the SLRC, construction traffic would potentially have a significant adverse impact at the intersection of Silver Lake Boulevard and Van Pelt Place. Potentially significant impacts would be reduced by Mitigation Measure TT-2, but potentially significant impacts may remain after mitigation.	**Mitigation Measure TT-2: Silver Lake Boulevard and Van Pelt Place** Truck deliveries for materials or equipment will be scheduled so that ~~none of the~~ truck trips would arrive or depart the SLRC ~~during~~ *outside* the afternoon peak period between 4:00 p.m. and 6:00 p.m. ~~Any truck deliveries will occur before the afternoon peak period.~~	S
	At the SLRC, construction traffic would potentially have a significant adverse impact at the intersection of Riverside Drive and Fletcher Drive. Potentially significant impacts would be mitigated by Mitigation Measure TT-2.	**Mitigation Measure TT-2: Riverside Drive and Fletcher Drive** Truck deliveries for materials or equipment will be scheduled so that ~~none of the~~ truck trips would arrive or depart the SLRC ~~during~~ *outside* the afternoon peak period between 4:00 p.m. and 6:00 p.m. ~~Any truck deliveries will occur before the afternoon peak period.~~	LS

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
Construction activities at the HWSG site include in-street construction in Forest Lawn Drive for a water distribution line. At the SRC, in-street construction is required for the jacking and receiving pits for the bypass pipeline, for construction of the relief stations, and potentially for the regulating station trunk line. Potentially significant traffic impacts from this in-street construction would be mitigated by Mitigation Measure TT-3.		**Mitigation Measure TT-3: Transportation Management Plan** A site-specific transportation management plan (TMP) will be prepared for any stage of construction that may affect traffic flow in the surrounding street system. This plan may include some or all of the following: • Construction work traffic impacts and strategies, including detours and traffic handling. • Strategies for reducing worker trips, including carpooling and transit. • General access restrictions associated with the Proposed Project, including proper notification of affected residences, businesses, and other facilities prior to construction. Advance public notification will include posting of notices and appropriate signage of construction activity. The TMP must ensure adequate access to residences and facilities via existing roadway intersections and private driveways at all times or include alternate access, detours, or temporary mitigation to address access restrictions adequately. • Emergency access restrictions associated with the Proposed Project, including proper notification of emergency providers and provision of alternate routes, if necessary. All construction activities will be coordinated with local law enforcement, fire protection, and other emergency service providers. These entities will be notified of the timing, location, and duration of construction activities. • Where construction will result in temporary lane closures of sidewalks and other pedestrian facilities, the TMP would address temporary pedestrian access, through detours or safe areas alongside the construction zone. Any affected pedestrian facilities and alternative facilities or detours will be identified. The development of this plan will be coordinated with Los Angeles Department of Transportation (LADOT) and Caltrans and will require LADOT approval prior to the implementation of any measures and activities that would affect traffic flow in the area.	LS

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
Noise (Chapter 10)			
Construction noise produced by onsite machinery may produce levels that exceed ambient noise levels by 5 decibels (dBs) at the HWSG site and at the SLRC, resulting in significant impacts. Potential impacts from construction-related noise at the HWSG site would be mitigated by Mitigation Measure N-1; potential construction-related noise impacts at the SLRC would be mitigated by Mitigation Measure N-2.		**Mitigation Measure N-1: Construction Noise at the HWSG Site** Measures to minimize noise from construction activities at the HWSG site include some or all of the following: • A noise monitoring and mitigation program at the HWSG site will be instituted to continuously assess construction noise impacts and implement mitigation when and where required. The program will account for perceived impacts as well as actual measured noise levels. • Use of extreme noise producers will be minimized as much as possible because aggregate noise levels are generally driven by a few loud machines. Activities such as rock crushing, which produces noises that are both loud and dissimilar to ambient noise, will be minimized. Every effort will be made to complete such activities as soon as possible, rather than extended over the duration of construction. When feasible, extreme noise producers will be shielded by a sound barrier and located as far as possible from noise-sensitive receivers. Where feasible, such activities will be conducted offsite at a nonsensitive location. • Fixed-location machinery, such as generators and compressors, will be shielded from sensitive receivers. Shielding may comprise any arrangement that produces substantial noise reductions including manufactured enclosures; plywood barriers; terrain (berms, dirt piles); and other large, fixed-location machinery. • Activities that may be performed at a fixed location (e.g., sawing lumber) will be shielded similar to the third measure, above. • Machinery will be equipped with high-performance mufflers and other noise-reducing equipment. Machinery will be maintained in good running condition, including frequent lubrication to minimize squealing and additional engine load, to reduce annoying noise emissions.	S

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
		• Construction hours will be strictly enforced. Staging areas will be secured with a locked fence to prevent early startup or late-night maintenance.	
		Mitigation Measure N-2: Construction Noise at the SLRC Measures to minimize noise from construction activities at the SLRC include some or all of the following: • A noise monitoring and mitigation program at the SLRC will be instituted to continuously assess construction noise impacts and implement mitigation when and where required. The program will focus primarily on ensuring no hazardous noise levels exist at nearby residences. Long-term (all day) monitoring should be conducted to verify that noise levels at sensitive receptors do not exceed permissible limits as determined by the appropriate authority. • Construction areas will be shielded with noise control barriers, particularly the area surrounding the regulating station. Barriers may be of any configuration sufficient to control the immediate noise levels; specifically, they should be heavy, continuous (no gaps), and have a sound-absorptive surface on the construction side. Typical construction sound barriers include 3/4-inch plywood with a glass or mineral wool facing, commercially available post-and-panel noise-control fencing, and commercially available noise-control curtains. Barrier height will be as tall as can be practically and safely erected, but should be a minimum of 8 feet high. Entrances to the noise-controlled areas will be located away from sensitive receivers. If feasible, the entrance to the regulating station area will be to the east or southeast (facing the dog park).	S

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
		• Use of extreme noise producers will be minimized as much as possible because aggregate noise levels are generally driven by a few loud machines. Every effort will be made to complete such activities in a timely manner, rather than extending them over the duration of construction. Where feasible, they will be shielded by a sound barrier and located as far as possible from noise-sensitive receivers. Where feasible, such activities will be conducted offsite at a nonsensitive location. • Fixed-location machinery, such as generators and compressors, will be shielded from sensitive receivers. Shielding may comprise any arrangement that produces substantial noise reductions including manufactured enclosures; plywood barriers; terrain (berms, dirt piles); and other large, fixed-location machinery. • Activities that may be performed at a fixed location (e.g., sawing lumber) will be shielded similar to the fourth measure above. • Equipment maintenance and testing facilities at the staging area will be shielded similar to the second measure above. • Machinery will be equipped with high-performance mufflers and other noise-reducing equipment. Machinery will be maintained in good running condition, including frequent lubrication to minimize squealing and additional engine load, to reduce annoying noise emissions. • Loudest operations in the late afternoons and evenings, particularly after 7:00 p.m., will be avoided. • Noise-producing equipment maintenance and testing at the staging area in the evenings, particularly after 7:00 p.m., will be avoided. Testing of loud machinery will be scheduled to coincide with peak morning and afternoon traffic hours, if possible. • Unnecessary equipment will be shut down overnight (e.g., blowers or generators will not be left running unnecessarily). • Construction hours will be strictly enforced. The staging area will be secured with a locked fence to prevent early startup or late-night maintenance.	

TABLE ES-1
Summary of Project Impacts and Mitigation Measures

Potentially Significant Impact		Mitigation	Level of Significance after Mitigation
HWSG Site	**SLRC**		
	Noise produced by the regulating station at the SLRC is anticipated to exceed ambient noise levels by more than 5 dBs, resulting in a significant impact. This impact would be mitigated by Mitigation Measure N-3.	**Mitigation Measure N-3: Noise from Regulating Station at the SLRC** Sufficient technology currently exists to reduce noise levels from the regulating station to a less-than-significant level. However, given that project operation is not anticipated to begin until late 2013, identification of specific sound-reducing measures is not practical because sound-reduction technology is constantly evolving and advancing (i.e., more sophisticated sound-reduction technology is anticipated to be available in the future than is available today). LADWP will include technologically advanced sound-reduction measures in its detailed design of the regulating station equipment and/or enclosure materials to ensure that *the regulating station will produce* noise levels ~~during operation of the regulating station are~~ *no more than* 40 dBA ~~or less~~ at the nearest residence.	LS
Air Quality (Chapter 11)			
Construction emissions are anticipated to exceed maximum daily levels for ROG, NO_x and PM_{10} at the HWSG site, and NO_x and PM_{10} at the SLRC. When construction emissions for both Proposed Project sites are combined, construction emissions are anticipated to exceed significance thresholds for ROG, NO_x, and PM_{10}. Mitigation to reduce significant air quality impacts would be provided by Mitigation Measure AQ-1.		**Mitigation Measure AQ-1: Construction** The following measures would be implemented to reduce construction-related air quality impacts during all nine phases of project construction: • Equipment idling time ~~shall~~ *will* be minimized to the extent possible. • Equipment engines ~~shall~~ *will* be maintained in good condition and in proper tune in accordance with manufacturer specifications. • Electricity from onsite power poles will be used, as feasible, in place of temporary diesel-powered generators. • All construction equipment *powered by diesel fueled internal combustion engines* ~~shall~~ *will* utilize emulsified diesel fuel. The use of such fuel has been demonstrated by the California Air Resources Board to reduce NO_x by 14 percent and reduce PM_{10} (from engine combustion) by 63 percent.	S

Notes:
LS = Less than Significant after Mitigation
S = Potentially Significant Impact remains after Mitigation

Ivanhoe and Silver Lake Reservoirs are connected by a dam with a 53-foot-wide rectangular concrete spillway with an apron-style design on the Silver Lake side. When the water elevation of Ivanhoe Reservoir exceeds 451 feet, water flows over the spillway at an estimated average flow rate of 70 cubic feet per second resulting in about 50,680 acre-feet of water flowing over the spillway into Silver Lake Reservoir per year. When Silver Lake Reservoir is removed from service, and is no longer providing potable water for consumptive uses, the operational demands requiring the current volume of water spilling from Ivanhoe Reservoir into Silver Lake Reservoir would all but be eliminated. Water requirements for Silver Lake reservoir would be reduced to about 385 acre-feet per year to replenish water lost to evaporation. LADWP would either use the spillway or an underground pipeline to add makeup water to Silver Lake Reservoir. In either case, the spillway would remain in place and would be maintained along with the reservoirs.

Silver Lake and Ivanhoe Reservoirs are in an urban setting and are eutrophic, as defined by existing nutrient concentrations. Currently, the reservoirs are managed by LADWP as drinking water reservoirs and are maintained in a mostly clear condition by the application of approved treatment chemicals, including chlorine. Following the removal of the reservoirs from water distribution system, the reservoirs would be allowed to revert to a more natural state. This would be accomplished by discontinuing the addition of water treatment chemicals. LADWP expects that, as a result, the water in the reservoirs would generally change from a clear appearance to a less transparent, green color. This change in color would be due to increased algal growth because of sufficient existing nutrient concentrations. It is not expected that the amount of algae would exceed that which has been experienced periodically in the past. LADWP has had positive water quality experiences at Hollywood and Encino Reservoirs since they were removed from service. It is expected that a series of changes would occur over time in the types of organisms present as the reservoir adapts to the new operating regimen. Because the two reservoirs would be removed from service to the distribution system at different times, there would be a period of approximately 4 to 5 years when the color of the water in Silver Lake Reservoir would change to green while the water in Ivanhoe Reservoir remains blue as a result of water-treatment chemicals.

Silver Lake and Ivanhoe Reservoirs would remain under DSOD jurisdiction and LADWP would be required to maintain the structural integrity of the reservoirs.

4.3 Draft EIR Resource Chapter Changes

4.3.1 Chapter 3.0, Land Use

Changes to Section 3.1.3.3

In response to comments received on the Draft EIR, the Silver Lake-Echo Park Community Plan referenced in this chapter is hereby changed by reference to reflect the current plan name, the Silver Lake-Echo Park-Elysian Valley Community Plan.

4.3.2 Chapter 4.0, Earth Resources

Changes to Section 4.3.1

As shown above in Table ES-1, Mitigation Measure ER-1: Soil Resources and Mitigation Measure ER-2: Geologic Hazards have been slightly revised.

4.3.3 Chapter 5.0, Water Resources

Changes to Section 5.1.3.1

In response to comments received on the Draft EIR, text related to the beneficial uses for the Silver Lake Reservoir found on page 5-5 of the Draft EIR has been revised as shown below:

Water quality is regulated under the Clean Water Act on the federal level, and by the Porter-Cologne Act on the state level. In California, EPA delegates the responsibility for Clean Water Act compliance to the *California Department of Health Services and the California* State Water Resources Control Board (SWRCB), who sets statewide policies and develops regulations for implementation of water quality control programs. SWRCB, in turn, delegates regional responsibility to nine RWQCBs. The Los Angeles Regional Water Quality Control Board has prepared *Water Quality Control Plan Los Angeles Region: Basin Plan for Coastal Watersheds of Los Angeles and Ventura Counties (1994),* known as the Basin Plan, to preserve and enhance water quality and protect the beneficial uses of all regional waters (California RWQCB, 1994).

Beneficial uses are historical, existing, or potential uses of a body of waterbody under the Federal Clean Water Act of 1972. Locally, the beneficial uses of a waterway or waterbody are determined by the RWQCB. In the Basin Plan, the RWQCB lists ~~municipal drinking water supply as one of~~ the *following* beneficial uses for the Silver Lake Reservoir~~.~~*:*

- *Existing for Municipal Drinking Water Supply*
- *Existing for Industrial Service Supply*
- *Existing for Industrial Process Supply*
- *Potential for Water Contact Recreation*
- *Existing for Non-contact Water Recreation*
- *Potential for Warm Freshwater Habitat*
- *Existing for Wildlife Habitat*

The plan notes that the existing beneficial use for the Silver Lake Reservoir as municipal drinking water supply is designated under SB88-63 and RB89-03 and may be considered for exemption at a later date. In addition, the plan notes that public access to the reservoir and its surrounding watershed is prohibited by LADWP.

Changes to Section 5.3.1

As shown above in Table ES-1, Mitigation Measure WR-1: Surface Water Quality has been slightly revised.

4.3.4 Chapter 6.0, Biological Resources

Changes to Section 6.2.8.6.2

In response to comments received on the Draft EIR, Section 6.2.8.6.2 (Draft EIR page 6-23) has been revised as shown below:

6.2.8.6.2 SLRC

Both Silver Lake and Ivanhoe Reservoirs generate sufficient invertebrate production to support a small population of migratory waterfowl. Birds identified as using the SLRC will forage on invertebrates as well as aquatic and terrestrial vegetation. No species that specialize on foraging on fish were observed at the SLRC. The current water supply to the SLRC is chlorinated to maintain clarity. Following the removal of the SLRC as an integral part of the drinking water system as a part of the Proposed Project, the reservoirs would be allowed to revert to a more natural state. This will be accomplished by discontinuing the addition of water treatment chemicals. It is anticipated that, as a result, increased algal growth would occur because of sufficient existing nutrient concentrations. However, it is not expected that the amount of algae would exceed that which has been experienced periodically in the past.

The changes in aquatic habitat at the SLRC associated with the Proposed Project are not anticipated to adversely affect migratory wildlife. In general, with the elimination or reduction in application of chlorine to the water supply, there may be an increase in invertebrate production.~~;~~ *Although no fish would be introduced in conjunction with the Proposed Project,* ~~and~~ fish such as mosquitofish may become established. This would be an increase in forage supply for migratory waterfowl, and would be a net benefit to these species. If conditions temporarily become eutrophic or hypertrophic, there would be a corresponding decline in dissolved oxygen; and this may limit invertebrate production or result in fish kills. However, conditions would not be expected to drop below the existing current baseline, where invertebrate production and fish are limited by the addition of chlorine to the system. For an additional discussion of surface water quality changes anticipated at the SLRC, see Chapter 5.0, Water Resources, Section 5.2.3.2.

~~Some emergent vegetation may eventually become established at the SLRC. The emergent wetland would represent a new habitat type not currently present, and would attract additional species of waterfowl adapted to shallow marsh conditions, resulting in a net benefit to migratory waterfowl.~~

Changes to Section 6.3.1

As shown above in Table ES-1, Mitigation Measure BR-4: Nesting Birds of Special Concern has been slightly revised.

4.3.5 Chapter 7.0, Cultural Resources

Changes to Section 7.1.2.2.2

In response to comments received on the Draft EIR, Section 7.1.2.2.2 (Historical Resources at the SLRC; Draft EIR pages 7-9 and 7-12) has been revised as shown below:

Silver Lake Meter House

Standing off the southwest corner of the chlorination station, nearer the street, is the Silver Lake Meter House. The small, one-story Mediterranean Revival-style building corresponds architecturally with the adjacent chlorination station. It is square in footprint and covered by a pyramidal, hipped roof clad with red Spanish tiles. Of cast-in-place concrete construction, the walls are finished with rough-troweled stucco with a narrow,

molded cornice beneath closed eaves. The windowless building is accessed by a steel clad door in its east elevation.

The meter house was designed by LADWP Bureau of Water Works and Supply staff and was likely completed in late 1927 or early 1928, about 20 years before the adjacent chlorination station. It originally contained a single outlet flowmeter. The exterior of the structure is essentially unaltered.

The chlorination station and meter house lot are enclosed by a low, chain-link fence and landscaped with ficus trees and topiary, ivy ground cover, yucca, and ~~neatly~~ trimmed holly shrubs.

Trees and Other Landscape Features

The intent of the designers of the Silver Lake and Ivanhoe Reservoirs was to create natural-looking bodies of water in a richly landscaped sylvan setting that would both attract development to the surrounding area and exist as a verdant enclave in the midst of the expanding city. To this end, portions of the reservoir property were left with their natural topography and vegetation, while other areas were planted in a naturalistic way with trees, shrubs, and other vegetation. Some alterations to the original landscaping were necessitated by the various reservoir improvement projects beginning in the 1930s and continuing through the present ~~day~~. Reservoir improvements of the early 1950s, in particular, resulted in changes in the appearance of the reservoir and landscaping of directly adjacent areas. In-filling of the East Cove resulted in a substantial level area planted in lawn referred to as the "meadow." Currently, the reservoir complex incorporates numerous mature trees of both native and introduced species, including live oak, eucalyptus, California sycamore, various species of pines, cedars, and palms, bottlebrush, olive, pepper, and magnolia. Additionally, the well-maintained, park-like setting is enhanced by areas of shrubs and bushes interspersed within expanses of open lawn and low vegetation such as the "meadow." The Silver Lake south dam is also landscaped with ornamental grasses, wildflowers, and other ground cover.

Changes to Section 7.2.3.2

In response to comments received on the Draft EIR, Section 7.2.3.2 (Draft EIR page 7-16) has been revised as shown below:

7.2.3.2 Operation

LADWP may discontinue the use of the spillway that connects Ivanhoe and Silver Lake Reservoirs. The two reservoirs were originally connected by a 36-inch cast-iron pipe beneath the fill of the separating dam; the open-channel spillway was added in 1944. Because the spillway would not be removed, only potentially unused, there would be no change to the structure or appearance of the dam. Therefore, discontinuing use of the spillway is not considered to be a significant impact to the cultural/historical significance of the reservoirs.

No adverse impacts to cultural resources are expected during operation of the bypass pipeline, regulating station, and relief stations or by the change in function of Silver Lake and Ivanhoe Reservoirs, provided that the SLRC is maintained consistently with the appearance and condition that LADWP has provided at this facility for several years.

Changes to Section 7.3.1

As shown above in Table ES-1, Mitigation Measure CR-1: Archaeological Resources and Mitigation Measure CR-2: Historic Landscaping Restoration have been slightly revised.

4.3.6 Chapter 8.0, Paleontological Resources

Changes to Section 8.3.1

As shown above in Table ES-1, Mitigation Measure PR-3: Paleontologic Resources at the SLRC has been slightly revised.

4.3.7 Chapter 9.0, Traffic and Transportation

Changes to Section 9.3.1

As shown above in Table ES-1, Mitigation Measure TT-1: Forest Lawn Drive and Zoo Drive, Mitigation Measure TT-2: Silver Lake Boulevard and Van Pelt Place, and Mitigation Measure TT-2: Riverside Drive and Fletcher Drive have been slightly revised.

In response to comments received on the Draft EIR, an additional mitigation measure has been added to help reduce potential impacts to funeral processional traffic along Forest Lawn Drive adjacent to the HWSG site, as shown below:

Mitigation Measure TT-4: Funeral Processional Traffic

- *No construction equipment, trucks, or other construction-related vehicles will stop or slow roadway through traffic when a funeral procession is attempting to pass the construction site or exit or enter Forest Lawn Memorial Park Hollywood Hills or Mount Sinai Memorial Park. No construction site employee will stop or slow roadway traffic when a funeral procession is attempting to enter or exit the memorial parks. Processional traffic, entering or exiting the memorial parks, will have first priority over construction equipment or vehicles.*

- *At least two weeks prior to and throughout construction, contact information will be provided to allow Forest Lawn Memorial Park and Mount Sinai Memorial park to advise LADWP or problems, concerns, or upcoming events that might affect the construction site or construction activities. An emergency contact will also be provided for after-hours, weekends, and holiday emergencies.*

4.3.8 Chapter 10.0, Noise

Changes to Section 10.3.2

As shown above in Table ES-1, Mitigation Measure N-3: Noise from Regulating Station at the SLRC has been slightly revised.

4.3.9 Chapter 11.0, Air Quality

Changes to Section 11.3.1

As shown above in Table ES-1, Mitigation Measure AQ-1: Construction has been slightly revised.

4.3.10 Chapter 12.0, Public Services and Utilities

Changes to Section 12.2.3.1

In response to comments received on the Draft EIR, text related to impacts to community facilities at the SLRC during construction (Draft EIR page 12-4) has been revised as shown below:

Community Facilities

Construction of the proposed facilities at the SLRC would not require additional facilities or staffing of existing community facilities nor would it diminish the level of service for existing community facilities. Neither the dog park nor the nursery school would be impacted by construction activities at the SLRC. *LADWP would not unnecessarily restrict parking adjacent to the Silver Lake Recreation Center during construction when space is not required. Additionally, LADWP would coordinate with designated polling places (including the Silver Lake Recreation Center) to avoid traffic conflicts with voters related to Proposed Project construction.* Users of the Silver Lake Recreation Center may be temporarily inconvenienced by construction of the regulating station, but any related impacts are considered to be temporary and not adverse.

4.3.11 Chapter 14.0, Visual Resources

Changes to Section 14.2.3.1.2

In response to minor project description changes, Section 14.2.3.1.2, Impacts During Operational Period, has been slightly revised to address discontinuing the use of the spillway between Ivanhoe and Silver Lake Reservoirs, as shown below:

14.2.3.1.2 Impacts During Operational Period

Under the Proposed Project, Ivanhoe and Silver Lake Reservoirs would cease to function as reservoirs for storage of treated water. The reservoirs would remain in place, and their water levels would be maintained; but they would be disconnected from the LADWP water distribution system. Operation and maintenance of the reservoirs that would occur under the Proposed Project is detailed in Section 2.2.3.1.3 of the Project Description Chapter.

The *primary* ~~only~~ long-term alteration in the visible appearance of these reservoirs that may occur as a result of these changes is a change in water color. Because the water in the reservoirs would no longer be treated, it is likely that the reservoir waters would support some level of algae growth, which could give the water in reservoirs a greenish hue. The change in water color would cause a change in the appearance of the views toward the lake like those represented in Photo 7 in Figure 14-8, but the overall visual quality of the view would not be substantially altered. During the 4- to 5-year period after the Silver Lake Reservoir has been taken out of service and before the Ivanhoe Reservoir has been removed from service, the water in the Silver Lake Reservoir would have a greenish hue, while the water in the Ivanhoe Reservoir would remain blue. The contrast in the color of the water in the two reservoirs could call attention to change in color of the water in Silver Lake Reservoir, sustaining an awareness of the color change that could contribute to an increase in the perceived level of visual impact during this interim period.

An additional effect related to the change in the operation of the reservoirs would be that although the spillway located in the dam separating the two reservoirs would remain and would not be altered,

water may no longer be visible flowing down the spillway's paved apron from Ivanhoe to Silver Lake Reservoir. Because visibility of the water flows in the spillway is somewhat restricted, and because the visual importance of this highly engineered and localized feature is secondary to the importance of the views of large water surfaces of the reservoirs, the overall impact related to the change to the spillway's appearance would be relatively minor.

Changes to Section 14.3.2.1.1

In response to comments received on the Draft EIR, LADWP has incorporated an additional measure included as part of the Proposed Project to help reduce unattractive construction views to funeral processional traffic along Forest Lawn Drive at the HWSG site, as shown below:

Measures Included as a Part of the Proposed Project

- The equipment and staging area would be located as near to the center of HWSG site as practicable, where it is least visible from viewers, particularly those in the nearby cemeteries.
- Night lighting of the Proposed Project site and staging area would be limited to that required for safety and security, and lights would be directed to minimize offsite light-spill.
- *Screening on construction fences will be used along Forest Lawn Drive for the length of the HWSG site.*

4.3.12 Chapter 15.0, Alternatives

Changes to Section 15.3.3

In response to comments received on the Draft EIR, text related to the comparison of the No Project and OTSOC Alternative to the SLRC SRP (Draft EIR page 15-10) has been added as shown below:

15.3.3 Comparison of the No Project and OTSOC Alternatives to the Proposed Project

The Proposed Project would remove Silver Lake and Ivanhoe Reservoirs from direct service to the LADWP water distribution system. Water storage currently provided by the SLRC would be replaced by a 110-million-gallon buried storage reservoir at the HWSG site. The new water storage reservoir would be accompanied by a 4-megawatt hydroelectric power generating facility at the HWSG site to capture energy from the water pressure flowing into the reservoir. A regulating station at the southern end of the SLRC, two relief stations, and a new b-pass pipeline around the SLRC would convey water to existing service areas. Overall construction of the SLRC SRP is anticipated to require roughly 6.5 years. Construction at the HWSG site would occur roughly between January 2007 and April 2013. Construction at the SLRC would occur roughly between May 2007 and November 2009 and again between May and July 2013. Potentially significant impacts associated with the Proposed Project are listed below.

Table 15-3 provides a comparison of the potential environmental impacts of the No Project and OTSOC Alternatives to the Proposed Project. The Proposed Project would result in potentially significant impacts related to traffic, noise, and air quality at the HWSG site and potentially significant impacts related to noise and air quality at the SLRC. The No Project Alternative would result in significant impacts to water resources at the SLRC because this alternative would not meet drinking water quality regulations, but would not result in any other Proposed Project-related impacts. The OTSOC Alternative would result in no potentially significant impacts at the HWSG site because no Proposed Project construction would take place there, but would result in potentially significant impacts related to land use, earth resources, water resources, biological resources, cultural resources, traffic, noise, air quality, and visual resources at the SLRC.

Appendix A
Mitigation Monitoring Plan

SLRC SRP Mitigation Monitoring Plan

This Mitigation Monitoring Program (MMP) has been prepared in accordance with Section 21081.6 of the Public Resources Code, which requires public agencies to adopt a reporting and/or monitoring program to ensure that mitigation measures identified in an EIR are carried out during and after project implementation.

This MMP is intended to facilitate the tracking of mitigation measures, especially those monitoring actions that will continue through the life of the Proposed Project.

The impacts attributable to the HWSG site and SLRC have been organized so as to maintain a more effective MMP. As such, this MMP is divided into two parts. Part A is the MMP associated with the HWSG site; Part B is the MMP associated with the SLRC.

The MMP contains information on potential impacts, what measures will be taken to mitigate those impacts, how the monitoring will be accomplished, who will be the responsible party, when implementation of the mitigation measures will take place, and the appropriate monitoring agency. More detailed information on each issue can be found in the Draft EIR chapter covering the specific resource area as identified in the MMP.

MMP Part A – HWSG Site and Vicinity

The MMP for the HWSG site addresses construction and operation activities directly at the HWSG site and in the vicinity of the HWSG site, including along Forest Lawn Drive, for the Silver Lake Reservoir Complex Storage Replacement Project. Part A of this MMP comprises pages 5 through 26.

HWSG Site and Vicinity MMP		
Resource Area	Earth Resources	
Potential Impact	Grading and excavation activities required for construction at the HWSG site may result in soil erosion and sedimentation runoff.	
Mitigation Measures		
One or more of the following measures to control soil erosion and sedimentation will be implemented: • The area disturbed by clearing, grading, earth moving, or excavation operations will be as small as feasible to prevent excessive dust. • Pregrading/excavation activities will include watering the area to be graded or excavated before commencement of grading or excavation. Application of water will penetrate sufficiently to minimize fugitive dust during grading activities. • Trucks will be required to have their loads covered going offsite. • Graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved onsite roadways, will be treated to prevent fugitive dust. Treatment will include, but not be limited to, periodic watering and/or roll compaction as appropriate. Watering will be done at least twice daily. • Inactive graded and/or excavated areas will be monitored at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction will be periodically implemented over portions of the construction site that are inactive for over 4 days. • During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), clearing, grading, earth-moving, and excavation operations will be curtailed to the degree necessary to prevent fugitive dust created by onsite activities and operations from being a nuisance or hazard to offsite properties. • Adjacent streets and roads impacted by project fugitive dust will be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads. • A Storm Water Pollution Prevention Plan (SWPPP) will be developed and implemented that will include Best Management Practices (BMPs) to minimize conveyance of sediment into waterways. The SWPPP may include some or all of the following or any other measure necessary: - V-ditches will be constructed above all cut or fill slopes to divert water from newly exposed slope faces. - Straw bale dikes or filter fabric barriers will be located downslope of disturbed areas to act as sediment traps. - Topsoil will be selectively removed, stockpiled, and replaced as a surface medium for revegetation. - Exposed slope faces will be revegetated as soon after construction as possible. - Temporary sedimentation basins will be constructed as necessary.		
Monitoring Action	Mitigation measures will be clearly specified by the LADWP during contract preparation. LADWP field engineers will conduct onsite inspection and monitoring of contractor compliance.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Construction Contractor	Contract Preparation Construction Post-construction	LADWP

HWSG Site and Vicinity MMP		
Resource Area	Earth Resources	
Potential Impact	Existing alluvial materials underlying the reservoir site may prove to be unsuitable foundation materials.	
Mitigation Measures		
The following measures will be implemented, as feasible, to mitigate potentially significant impacts resulting from geologic hazards to less-than-significant levels: • Facilities will be designed according to seismic standards as determined by geotechnical and seismic hazard analyses. The analyses will be based on site-specific subsurface investigations and ground motion design recommendations. • Appropriate geotechnical soil testing will be performed during the design phase so that the proposed grading and facilities can be properly designed to meet applicable structural and seismic requirements. • The foundation for the storage reservoir will be founded in competent materials at the site. The results of the site-specific design-level geotechnical and seismic hazard analysis noted above will assist in determining which foundation design and construction methods are implemented at the HWSG site. • LADWP will file a geotechnical report with the California Division of Safety of Dams (DSOD) as part of the application process for construction of a new reservoir. During construction, LADWP geotechnical engineers and inspectors from DSOD will monitor progress. Field checking of foundation and geologic conditions during construction will also ensure that designs and grading accommodate any unusual conditions that may not have been previously discovered. • If adverse slopes are encountered, slope stability will be analyzed; and slope stabilization measures will be established during design to minimize the potential for landslide damage. • Cuts and fill slopes will not exceed a 2:1 (horizontal:vertical) ratio except for cuts directly into bedrock where steeper slopes may be safely obtained. • Analyses of slope stability will be made in areas where cuts into marginal or adversely dipping slopes are required for construction of proposed facilities to minimize the potential for landslide damage.		
Monitoring Action	Geologic reports and plans for structures and grading will be submitted by the LADWP to the City of Los Angeles – Department of Building and Safety (LADBS) and to DSOD as part of the process for required permits ensuring conformance to City seismic and building codes.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP LADBS DSOD	Project Design Preconstruction Construction	LADWP DSOD

HWSG Site and Vicinity MMP		
Resource Area	Water Resources	
Potential Impact	Short-term impacts to surface water quality could occur during construction at the HWSG site in the event of drainage from precipitation that would potentially result in substantial erosion. Changes in topography and the presence of excavated and/or unprotected soil could all affect stormwater runoff.	
Mitigation Measures		
• The project will obtain an NPDES Municipal Stormwater General Construction Permit (General Permit), and comply with all permit requirements. • A SWPPP will be developed and implemented that will include BMPs to minimize conveyance of sediment into waterways. The SWPPP may include some or all of the following or any other measure necessary: - V-ditches will be constructed above all cut or fill slopes to divert water from newly exposed slope faces. - Straw bale dikes or filter fabric barriers will be located downslope of disturbed areas to act as sediment traps. - Topsoil will be selectively removed, stockpiled, and replaced as a surface medium for revegetation. - Exposed slope faces will be revegetated as soon as possible after construction. - Temporary sedimentation basins will be constructed as necessary. • Interim grading and other measures specified by the Los Angeles City erosion control ordinances will be employed to mitigate any short-term flooding due to stormwater.		
Monitoring Action	LADWP will ensure that an NPDES Permit and SWPPP is developed, approved by the Regional Water Quality Control Board, and followed by the construction contractor. LADWP field engineers will conduct onsite inspection and monitoring of contractor compliance.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Construction Contractor	Project Design Pre-construction Construction Post-construction	LADWP City of Los Angeles, Department of Building and Safety Regional Water Quality Control Board

HWSG Site and Vicinity MMP	
Resource Area	Biological Resources
Potential Impact	The HWSG site contains limited natural habitat that supports wildlife foraging and nesting. To minimize construction impacts to these resources, the following measures would be implemented as applicable during construction.

Mitigation Measures

The following Best Management Practices (BMPs) will be implemented as applicable during construction at the HWSG site:

- Worker environmental awareness training for construction personnel will be provided to identify sensitive biological resources that may occur in construction areas, and identify measures required to minimize Proposed Project impacts during construction and operation. Ongoing environmental monitoring will be provided by LADWP to ensure compliance with environmental requirements throughout the construction phase of the Proposed Project.
- Preconstruction surveys by qualified biologists will be implemented for special-status species in impact areas prior to beginning ground-disturbing activities; and, if necessary and feasible, resource relocation or exclusion will be implemented. Resource relocation will be conducted by qualified biologists in coordination with CDFG or USFWS. Exclusion zones will be implemented with fencing and/or signage that restricts access.
- The boundaries of the construction area within the Proposed Project site will be marked with stakes and flags. No construction activities, vehicular access, equipment storage, stockpiling, or significant human intrusion will occur outside the designated construction area.
- Proposed Project ingress and egress routes will be designated and flagged or staked, and vehicle traffic outside these routes will not be allowed. Vehicular traffic will adhere to a speed limit of 15 mph during construction to ensure avoidance of impacts to sensitive biological resources on access roads.
- Lighting for construction activities conducted during nighttime hours will be minimized to the extent possible through the use of directional shading to protect nocturnal wildlife activities. Construction later than 8:00 p.m. is not anticipated for the Proposed Project.
- Construction sites will be monitored daily to pick up trash and litter. Food-related trash and litter will be placed in closed containers and disposed of daily. Pets will be prohibited in the construction area.
- Intentional killing or collection of either plants or wildlife at construction sites will be prohibited, except as necessary and/or addressed elsewhere in this document. Discharging of firearms will be prohibited on construction sites.
- Only agency-approved pesticides, herbicides, fertilizers, dust suppressants, or other potentially harmful materials will be applied within the construction area, in accordance with relevant state and federal regulations.
- Soil or invasive plant seed transfer from clothing, shoes, or equipment will be minimized through cleaning and monitoring of personnel or equipment transfers between sites, or prior to initial entry on the site, as necessary.
- In habitats where nesting birds might occur, vegetation removal will occur outside the bird breeding season (February 1 to August 31), as feasible, to avoid take or disturbance that would cause abandonment of active nests containing eggs and/or young. If Proposed Project activities cannot avoid the bird breeding season, nest surveys will be conducted and active nests avoided and provided with a minimum buffer as determined by a biologist. For active raptor nests, this buffer will be a minimum of 500 feet.
- In habitats where roosting bats might occur, ground disturbance and roost destruction will be avoided during the parturition period (March 15 through August 31). Where this is not feasible, exit surveys and/or roost surveys of potential roost sites will occur; and active roosts will be flagged. Construction activity within 300 feet of active roosts will be prohibited until the completion of parturition (end of August). Alternatively, if potential roosts are identified prior to onset of parturition, roosts may be excluded during the evening forage period (within 4 hours after dark) or fitted with one-way exit doors to effectively eliminate and exclude roost.
- A revegetation plan will be prepared for all areas where bare ground is left exposed by construction activities. The revegetation plan will consist of container stock and/or seed of plants native to historical conditions at the

HWSG Site and Vicinity MMP		
Resource Area	Biological Resources	
Potential Impact	The HWSG site contains limited natural habitat that supports wildlife foraging and nesting. To minimize construction impacts to these resources, the following measures would be implemented as applicable during construction.	
Mitigation Measures		
Proposed Project sites, including grassland, riparian, scrub, and woodland species native to the Santa Monica Mountains and/or LA River corridor. The plan will specify application methods and quantities, performance criteria, and monitoring requirements. • Only permitted, authorized construction vehicles that have been inspected to ensure fire safety requirements on the construction sites will be allowed. Vehicles will be equipped with catalytic converters with shielding or other acceptable fire prevention features. Camping, trash-burning fires, and warming fires will be prohibited in the construction area. • Equipment will not be operated in areas of ponded or flowing water, and no wet excavations will be performed during construction in ponds or stream beds. Stationary equipment such as motors, pumps, generators, and welders will be located a minimum of 200 feet outside CDFG and USACE jurisdictional drainages. Construction staging areas, stockpiling, and equipment storage will be located a minimum of 50 feet outside CDFG and USACE jurisdictional drainages. • Construction vehicles and equipment will be checked periodically to ensure that they are in proper working condition and that there will be no potential for fugitive emissions of oil and other hazardous products. Refueling or lubrication of vehicles and cleaning of equipment, or other activities that involve open use of fuels, lubricants, or solvents, will occur in upland locations at least 500 feet away from CDFG and USACE jurisdictional drainages, and at least 200 feet from other flagged, sensitive biological resources. • The Proposed Project will obtain an NPDES Municipal Stormwater General Construction Permit (General Permit), and comply with all permit requirements. As part of the permit requirements, a SWPPP will be prepared for the Proposed Project. The SWPPP will provide detailed descriptions of the various structural and nonstructural water quality management measures to be used, and may include construction BMPs; downstream water quality monitoring and use of permanent source-control BMPs; and treatment control BMPs, which may include installation of filters, straw bale barriers, silt fences, and treatment wetlands. These structures will be located outside CDFG and USACE jurisdictional drainages. • A Mitigation Monitoring Plan that outlines how LADWP will implement and monitor the mitigation measures specified herein will be prepared, and construction monitoring and compliance reports that analyze the effectiveness of the mitigation measures will be prepared.		
Monitoring Action	LADWP will retain a qualified biological monitor to prepare a biological resources Mitigation Monitoring Plan that incorporates the above BMPs and other biological resources mitigation measures at the HWSG site. The biological monitor will also prepare construction monitoring and compliance reports. Mitigation measures will be clearly specified by the LADWP during contract preparation. LADWP field engineers and the biological monitor will conduct onsite inspection and monitoring of contractor compliance.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Biological Monitor Construction Contractor	Contract Preparation Pre-construction Construction Post-construction	LADWP CDFG USFWS USACE

HWSG Site and Vicinity MMP			
Resource Area	Biological Resources		
Potential Impact	Construction activities at the HWSG site would potentially result in the loss of the riparian community along the southern edge of the site.		
Mitigation Measures			
To mitigate for the loss of riparian habitat along the south portion of the HWSG site, mitigation will be implemented that will include replacement of riparian areas consistent with anticipated requirements of federal Clean Water Act (CWA) permits and state Section 1600 agreements. Mitigation may be achieved through funding of existing mitigation banks, habitat restoration, or other means acceptable to resource agencies.			
Monitoring Action	LADWP will obtain and comply with permits and state Section 1600 agreements for replacement of riparian areas.		
Responsible Party	**Timing**	**Monitoring Agency**	
LADWP	Pre-construction	LADWP CDFG USFWS	

HWSG Site and Vicinity MMP			
Resource Area	Biological Resources		
Potential Impact	Construction activities at the HWSG site would potentially result in the loss of waters of the U.S. and CDFG jurisdictional streambed and bank, which would represent a significant impact.		
Mitigation Measures			
The Proposed Project will obtain and comply with conditions of permits issued from U.S. Army Corps of Engineers (USACE) (CWA, Section 404) and the CDFG (Streambed Alteration Agreement [SAA], Section 1603). The details of mitigation requirements for impacts to jurisdictional waters will be determined through continuing consultation with USACE and CDFG.			
Monitoring Action	LADWP will obtain and comply with necessary permits and agreements for impacts to jurisdictional waters.		
Responsible Party	**Timing**	**Monitoring Agency**	
LADWP Construction Contractor	Pre-construction Construction Post-construction	LADWP CDFG USACE	

<table>
<tr><th colspan="4">HWSG Site and Vicinity MMP</th></tr>
<tr><td>Resource Area</td><td colspan="3">Biological Resources</td></tr>
<tr><td>Potential Impact</td><td colspan="3">Because portions of the HWSG site have been relatively undisturbed for many years and rare plants may have a reservoir/seed source in adjacent Griffith Park, special-status plant species may be present during areas to be disturbed for construction activities.</td></tr>
<tr><td colspan="4">Mitigation Measures</td></tr>
<tr><td colspan="4">Mitigation for potential impacts to special-status plants will include the following:
• Preconstruction surveys will be conducted at the HWSG site prior to any ground-disturbing activities, and in the appropriate flowering season for special-status plants.
• If rare plants are identified at the HWSG site, then detailed mitigation will be developed in coordination with the appropriate resource agency (CDFG or USFWS), which may potentially include the following:
- Exclusion zones where practical to preclude impacts to rare plants
- Translocation of seeds, topsoil, and/or plants to areas outside the disturbance footprint
- Establishment of new populations in areas that will not be subject to future development, and where populations may be protected and managed in perpetuity
- Investment in mitigation bank lands as appropriate to the specific species</td></tr>
<tr><td>Monitoring Action</td><td colspan="3">LADWP will retain a qualified biologist to conduct a reconnaissance–level site survey prior to construction and implement mitigation measures.
LADWP will retain a qualified biological monitor to prepare a biological resources Mitigation Monitoring Plan that incorporates BMPs and other biological resources mitigation measures at the HWSG site. The biological monitor will also prepare construction monitoring and compliance reports.</td></tr>
<tr><td>Responsible Party</td><td>Timing</td><td colspan="2">Monitoring Agency</td></tr>
<tr><td>LADWP
Biological Monitor
Construction Contractor</td><td>Pre-construction</td><td colspan="2">LADWP
CDFG
USFWS</td></tr>
</table>

<table>
<tr><th colspan="3">HWSG Site and Vicinity MMP</th></tr>
<tr><td>Resource Area</td><td colspan="2">Biological Resources</td></tr>
<tr><td>Potential Impact</td><td colspan="2">Nesting bird species of special concern, consisting of yellow-breasted chat, California horned lark, loggerhead shrike, and burrowing owl, have the potential to nest at the HWSG site. Additionally, ardeids may nest in tall trees at the site.</td></tr>
<tr><th colspan="3">Mitigation Measures</th></tr>
<tr><td colspan="3">Preconstruction surveys for nesting special-status birds will be conducted at the HWSG site prior to ground-disturbing activities. Depending on the results of these surveys, the following mitigation measures will be implemented:
All vegetation removal required for the Proposed Project will occur prior to the nesting season for most birds (February to August) to avoid direct impacts to nesting birds.
Where nests for special-status birds are established within 500 feet of construction activities, construction will be delayed until (a) fledglings leave the nest and are independent of adults or (b) it is determined by CDFG that no adverse effects are likely to occur to the nest or brood from adjacent construction activities, and a Biological Monitor is provided to conduct construction monitoring to ensure that effects on the nest site or brood do not reach adverse levels.</td></tr>
<tr><td>Monitoring Action</td><td colspan="2">LADWP will retain a qualified biologist to conduct a reconnaissance–level site survey prior to construction and implement mitigation measures.

LADWP will retain a qualified biological monitor to prepare a biological resources Mitigation Monitoring Plan that incorporates BMPs and other biological resources mitigation measures at the HWSG site. The biological monitor will also prepare construction monitoring and compliance reports.</td></tr>
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<tr><td>LADWP
Biological Monitor
Construction Contractor</td><td>Pre-construction
Construction</td><td>LADWP
CDFG</td></tr>
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<tr><th colspan="4">HWSG Site and Vicinity MMP</th></tr>
<tr><td>Resource Area</td><td colspan="3">Biological Resources</td></tr>
<tr><td>Potential Impact</td><td colspan="3">Construction activities at the HWSG site may result in impacts to special-status bats when roost sites are located near construction disturbance areas.</td></tr>
<tr><th colspan="4">Mitigation Measures</th></tr>
<tr><td colspan="4">Preconstruction surveys for bat roosts will be conducted at the HWSG site prior to ground-disturbing activities. Where active roosts are identified during these surveys, the following mitigation measures will be implemented:
• Within 300 feet of the location of active roosts, ground disturbance and roost destruction will be avoided during the parturition period (March 15 through August 31).
• Where this avoidance is not feasible, if potential roosts are identified prior to onset of parturition, roosts may be removed during the evening forage period (within 4 hours after dark) or fitted with one-way exit doors to effectively eliminate and exclude roost.</td></tr>
<tr><td>Monitoring Action</td><td colspan="3">LADWP will retain a qualified biologist to conduct a reconnaissance–level site survey prior to construction and implement mitigation measures.

LADWP will retain a qualified biological monitor to prepare a biological resources Mitigation Monitoring Plan that incorporates BMPs and other biological resources mitigation measures at the HWSG site. The biological monitor will also prepare construction monitoring and compliance reports.</td></tr>
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<tr><td>LADWP
Biological Monitor
Construction Contractor</td><td>Pre-construction
Construction</td><td colspan="2">LADWP
CDFG</td></tr>
</table>

HWSG Site and Vicinity MMP	
Resource Area	Cultural Resources
Potential Impact	The potential for discovery of prehistoric or historical archaeological sites at the HWSG site is considered to be low; however, impacts may be potentially significant if sites are found.

Mitigation Measures

Potential impacts to cultural resources related directly or indirectly to Proposed Project-related activities will be reduced to below the level of significance through recovery or treatment of archaeological resources encountered during archaeological site investigations or monitoring of ground-disturbing activities (construction) in areas with the potential to contain archaeological resources.

When investigations identify unique archaeological resources as defined in Section 21083.2 of the Public Resources Code (PRC), the site will be subject to specified requirements for treatment. Where elements of the Proposed Project are expected to require earthmoving, the following program will be implemented and the requirements duly incorporated into Proposed Project plans and specifications:

- Retain a qualified archaeologist to implement a monitoring and recovery program in any area identified as having the potential to contain unique archaeological resources.
- A qualified archaeologist will monitor earth-moving activities in areas that are likely to contain unique archaeological resources. The archaeologist will be authorized to halt construction, if necessary, in the immediate area where buried cultural remains are encountered. Prior to the resumption of grading activities in the immediate vicinity of the cultural remains, the project proponent will provide the archaeologist with the necessary resources to identify and implement a program for the appropriate disposition as specified by Section 15064.5(e) of the CEQA Guidelines.
- The selected archaeologist will be required to secure a written agreement with a recognized museum repository regarding the final disposition and permanent storage and maintenance of any unique archaeological resources recovered as a result of the archaeological monitoring. This would also include corresponding geographic site data that might be recovered as a result of the specified monitoring program. The written agreement for the disposition of recovered artifacts will specify the level of treatment (preparation, identification, curation, cataloging) required before the collection would be accepted for storage.
- The selected archaeologist will attend a preconstruction meeting to provide information regarding regulatory requirements for the protection of unique archaeological resources. Construction personnel will be trained on procedures to be followed in the event that a unique archaeological resource is encountered during construction. In addition, the archaeologist will ensure that the preconstruction meeting participants are trained to notify the Los Angeles County Medical Examiner (coroner) within 24 hours of the discovery of human remains. Upon discovery of human remains, there will be no further excavation or disturbance of the site or any reasonably nearby area suspected to overlie adjacent human remains until the following conditions are met:
    - The Los Angeles County Medical Examiner has been informed and has determined that no investigation of the cause of death is required; and, if the remains are of Native American origin, the descendants of the deceased Native Americans have made a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98.

If archaeological sites are encountered during construction of the Proposed Project, an evaluation of significance will be made by the selected archaeologist. Those sites that are determined eligible for listing in the California Register of Historical Resources (CRHR) will be treated in accordance with one of the three feasible measures described in the "CEQA and Archaeological Resources," CEQA Technical Advice Series:

- Capping (covering) the site with a level of soil prior to construction over the site
- Incorporating into open space areas of the project site
- Excavating where the first two measures are not feasible

For eligible sites, the City of Los Angeles will, prior to construction, implement the applicable treatment plan.

HWSG Site and Vicinity MMP		
Resource Area	Cultural Resources	
Potential Impact	The potential for discovery of prehistoric or historical archaeological sites at the HWSG site is considered to be low; however, impacts may be potentially significant if sites are found.	
Mitigation Measures		
Monitoring Action	LADWP will retain a qualified archaeologist to monitor excavation activities and implement a monitoring and recovery program in any area identified as having the potential to contain unique archaeological resources. The archaeologist will have the authority to temporarily suspend excavation if archaeological resources are encountered.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Archaeologist Construction Contractor	Construction – excavation activities	LADWP

HWSG Site and Vicinity MMP		
Resource Area	Paleontologic Resources	
Potential Impact	Earth-disturbing activities at the HWSG site could potentially reveal paleontologic resources.	
Mitigation Measures		
• Earth-moving activities that have a potential for disturbing previously undisturbed strata identified as being paleontologically important will be monitored by a paleontologic construction monitor. If fossil remains are encountered, they will be recovered, along with associated specimen data and corresponding geologic and geographic site data. The level of monitoring will reflect the paleontologic importance/impact sensitivity of the rock unit underlying the area of disturbance and the type of earth-moving activity. • If fine-grained strata with a potential for containing microfossils or small fossil remains are encountered, rock/sediment samples will be collected and processed to allow for the recovery of these fossil remains. • If necessary, earth-moving activities will be diverted temporarily around a fossil/sampling locality until the fossil remains/sample has been removed. • If warranted, rock/sediment or fossil samples will be submitted to commercial laboratories for microfossil and pollen identification, or radiometric dating analysis. • Recovered fossil remains will be prepared to the point of identification, identified by knowledgeable paleontologists, curated, catalogued with Natural History Museum of Los Angeles Vertebrate Paleontology Department (LACMVP) fossil specimen and locality numbers, and transferred to the LACMVP for permanent storage. • A final technical report of results and findings will be prepared by the paleontologist. • Monitoring at the HWSG site will be conducted on a spot-check basis once excavation for the reservoir and any ancillary facility has reached a depth 5 feet below grade in the stream channel deposits. If fossil remains are encountered by excavation, the monitoring level will be increased to full time.		
Monitoring Action	LADWP will retain a qualified paleontologist to monitor excavation activities as described above. The paleontologist will have the authority to temporarily suspend excavation activities.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Paleontologist Construction Contractor	Construction – specific excavation activities	LADWP

HWSG Site and Vicinity MMP		
Resource Area	Traffic and Transportation	
Potential Impact	Construction traffic at the HWSG site would potentially have a significant adverse impact at the intersection of Forest Lawn Drive and Zoo Drive.	
Mitigation Measures		
The project work schedule will be arranged to minimize the impact at this location.		
Monitoring Action	Mitigation measures will be clearly specified by the LADWP during contract preparation. LADWP field engineers will monitor contractor compliance with employee work schedule requirements.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Construction Contractor	Contract Preparation Construction	LADWP

HWSG Site and Vicinity MMP			
Resource Area	Traffic and Transportation		
Potential Impact	In-street construction in Forest Lawn Drive may disrupt local traffic.		
Mitigation Measures			
A site-specific transportation management plan (TMP) will be prepared for any stage of construction that may affect traffic flow in the surrounding street system. This plan may include some or all of the following: • Construction work traffic impacts and strategies, including detours and traffic handling. • Strategies for reducing worker trips, including carpooling and transit. • General access restrictions associated with the Proposed Project, including proper notification of affected residences, businesses, and other facilities prior to construction. Advance public notification will include posting of notices and appropriate signage of construction activity. The TMP must ensure adequate access to residences and facilities via existing roadway intersections and private driveways at all times or include alternate access, detours, or temporary mitigation to address access restrictions adequately. • Emergency access restrictions associated with the Proposed Project, including proper notification of emergency providers and provision of alternate routes, if necessary. All construction activities will be coordinated with local law enforcement, fire protection, and other emergency service providers. These entities will be notified of the timing, location, and duration of construction activities. • Where construction will result in temporary lane closures of sidewalks and other pedestrian facilities, the TMP will address temporary pedestrian access, through detours or safe areas alongside the construction zone. Any affected pedestrian facilities and alternative facilities or detours will be identified. The development of this plan will be coordinated with Los Angeles Department of Transportation (LADOT) and Caltrans and will require LADOT's approval prior to the implementation of any measures and activities that would affect traffic flow in the area.			
Monitoring Action	LADWP will coordinate with LADOT and Caltrans to develop and implement a TMP for in-street construction.		
Responsible Party	**Timing**	**Monitoring Agency**	
LADWP Construction Contractor LADPT	Pre-construction Construction	LADWP LADOT	

HWSG Site and Vicinity MMP		
Resource Area	Traffic and Transportation	
Potential Impact	Construction traffic on Forest Lawn Drive may interfere with funeral processional traffic.	
Mitigation Measures		
• No construction equipment, trucks, or other construction-related vehicles will stop or slow roadway through traffic when a funeral procession is attempting to pass the construction site or exit or enter Forest Lawn Memorial Park Hollywood Hills or Mount Sinai Memorial Park. No construction site employee will stop or slow roadway traffic when a funeral procession is attempting to enter or exit the memorial parks. Processional traffic, entering or exiting the memorial parks, will have first priority over construction equipment or vehicles. • At least two weeks prior to and throughout construction, contact information will be provided to allow Forest Lawn Memorial Park and Mount Sinai Memorial park to advise LADWP or problems, concerns, or upcoming events that might affect the construction site or construction activities. An emergency contact will also be provided for after-hours, weekends, and holiday emergencies.		
Monitoring Action	Mitigation measures will be clearly specified by the LADWP during contract preparation. LADWP field engineers will conduct onsite inspection and monitoring of contractor compliance.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Construction Contractor	Contract Preparation Construction	LADWP

HWSG Site and Vicinity MMP			
Resource Area	Noise		
Potential Impact	Construction noise produced by onsite machinery may produce levels that exceed ambient noise levels by 5 decibels (dBs) at the HWSG site, resulting in significant impacts.		
Mitigation Measures			
Measures to minimize noise from construction activities at the HWSG site include some or all of the following: • A noise monitoring and mitigation program at the HWSG site will be instituted to continuously assess construction noise impacts and implement mitigation when and where required. The program will account for perceived impacts as well as actual measured noise levels. • Use of extreme noise producers will be minimized as much as possible because aggregate noise levels are generally driven by a few loud machines. Activities such as rock crushing, which produces noises that are both loud and dissimilar to ambient noise, will be minimized. Every effort will be made to complete such activities as soon as possible, rather than extended over the duration of construction. When feasible, extreme noise producers will be shielded by a sound barrier and located as far as possible from noise-sensitive receivers. Where feasible, such activities will be conducted offsite at a nonsensitive location. • Fixed-location machinery, such as generators and compressors, will be shielded from sensitive receivers. Shielding may comprise any arrangement that produces substantial noise reductions including manufactured enclosures; plywood barriers; terrain (berms, dirt piles); and other large, fixed-location machinery. • Activities that may be performed at a fixed location (e.g., sawing lumber) will be shielded similar to the third measure, above. • Machinery will be equipped with high-performance mufflers and other noise-reducing equipment. Machinery will be maintained in good running condition, including frequent lubrication to minimize squealing and additional engine load, to reduce annoying noise emissions. • Construction hours will be strictly enforced. The staging area will be secured with a locked fence to prevent early startup or late-night maintenance.			
Monitoring Action	Mitigation measures will be clearly specified by the LADWP during contract preparation. LADWP field engineers will conduct onsite inspection and monitoring of contractor compliance.		
Responsible Party	**Timing**	**Monitoring Agency**	
LADWP Construction Contractor	Contract Preparation Construction	LADWP	

HWSG Site and Vicinity MMP			
Resource Area	Air Quality		
Potential Impact	Construction activity at the HWSG site will result in fugitive construction emissions.		
Mitigation Measures			
To minimize construction emissions, the Proposed Project will implement standard construction practices. Fugitive dust produced during grading, excavation, and construction activities will be controlled pursuant to South Coast Air Quality Management District Rule 403. SCAQMD recommends minimizing fugitive dust (PM_{10} emissions) during all construction activities. The following measures will be implemented: • The area disturbed by clearing, grading, earth moving, or excavation operations will be as small as feasible to prevent excessive dust. • Pregrading/excavation activities will include watering the area to be graded or excavated before commencement of grading or excavation. Application of water (reclaimed, if available) will penetrate sufficiently to minimize fugitive dust during grading activities. • Trucks will be required to have their loads covered as required by the SCAQMD. • Graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved onsite roadways, will be treated to prevent fugitive dust. Treatment will include, but not be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering will be done at least twice daily. • Inactive graded and/or excavated areas will be monitored at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction and application of environmentally safe dust control materials, will be periodically implemented over portions of the construction site that are inactive for over 4 days. • Signs will be posted limiting traffic to 15 mph or less. • During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), clearing, grading, earth moving, and excavation operations will be curtailed to the degree necessary to prevent fugitive dust created by onsite activities and operations from being a nuisance or hazard to offsite properties. • Adjacent streets and roads impacted by project fugitive dust will be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads. Each of the aforementioned PM_{10} measures is assumed to be included in the SCAQMD Rule 403 – Dust Control Plan required for this Proposed Project. These combined measures are assumed to reduce fugitive PM_{10} by 50 percent, and are accounted for in the maximum daily and quarterly emissions calculated.		
Monitoring Action	LADWP will obtain and comply with the SCAQMD Rule 403 – Dust Control Plan. Mitigation measures will be clearly specified by the LADWP during contract preparation. LADWP field engineers will conduct onsite inspection and monitoring of contractor compliance.		
Responsible Party	**Timing**	**Monitoring Agency**	
LADWP Construction Contractor	Contract Preparation Pre-construction Construction	LADWP SCAQMD	

HWSG Site and Vicinity MMP		
Resource Area	Air Quality	
Potential Impact	Construction emissions are anticipated to exceed maximum daily levels for ROG, NO_x and PM_{10} at the HWSG site.	
Mitigation Measures		
The following measures will be implemented to reduce construction-related air quality impacts: • Equipment idling time will be minimized to the extent possible. • Equipment engines will be maintained in good condition and in proper tune in accordance with manufacturer specifications. • Electricity from onsite power poles will be used, as feasible, in place of temporary diesel-powered generators. • All construction equipment powered by diesel fueled internal combustion engines will utilize emulsified diesel fuel. The use of such fuel has been demonstrated by the California Air Resources Board to reduce NO_x by 14 percent and reduce PM_{10} (from engine combustion) by 63 percent.		
Monitoring Action	Mitigation measures will be clearly specified by the LADWP during contract preparation. LADWP field engineers will conduct onsite inspection and monitoring of contractor compliance.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Construction Contractor	Contract Preparation Pre-construction Construction	LADWP

HWSG Site and Vicinity MMP		
Resource Area	Visual Resources	
Potential Impact	Construction activities at the HWSG site may be unattractive to funeral procession traffic.	
Mitigation Measures		
Screening on construction fences will be used along Forest Lawn Drive for the length of the HWSG site.		
Monitoring Action	The mitigation measure will be clearly specified by the LADWP during contract preparation. LADWP field engineers will conduct onsite inspection and monitoring of contractor compliance.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Construction Contractor	Contract Preparation Pre-construction Construction	LADWP

HWSG Site and Vicinity MMP		
Resource Area	Visual Resources	
Potential Impact	The following measures have been included as part of the Proposed Project during construction at the HWSG site.	
Mitigation Measures		
• The equipment and staging area will be located as near to the center of the HWSG site as practicable, where it is least visible from viewers, particular those in the nearby cemeteries. • Night lighting of the Proposed Project site and staging area will be limited to that required for safety and security, and lights will be directed to minimize offsite light-spill.		
Monitoring Action	The measures will be clearly specified by the LADWP during contract preparation. LADWP field engineers will conduct onsite inspection and monitoring of contractor compliance.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Construction Contractor	Contract Preparation Pre-construction Construction	LADWP

HWSG Site and Vicinity MMP			
Resource Area	Visual Resources		
Potential Impact	The following measures have been included as part of the Proposed Project for operation of the hydroelectric plant at the HWSG site.		
Mitigation Measures			
• Night lighting of the plant will be limited to that required for safety and security, and lights will be directed to minimize offsite light-spill. • Additional landscaping will be provided, including planting more trees along the northern edge of Forest Lawn Drive to screen views of the facilities from Forest Lawn Drive and Forest Lawn Memorial Park. • A combination of a screening wall and/or landscaping will be used around the substation to screen views from Forest Lawn Drive.			
Monitoring Action	The measures will be clearly specified by the LADWP during contract preparation. LADWP field engineers will ensure that measures are in place following construction.		
Responsible Party	**Timing**	**Monitoring Agency**	
LADWP Construction Contractor	Contract Preparation Post-construction	LADWP	

MMP Part B – Silver Lake Reservoir Complex

The MMP for the SLRC addresses construction and operation activities directly at the SLRC and in the vicinity of the SLRC for the Silver Lake Reservoir Complex Storage Replacement Project. Part B of this MMP comprises pages 29 through 47.

SLRC and Vicinity MMP			
Resource Area	Earth Resources		
Potential Impact	Grading and excavation activities required for construction at the SLRC may result in soil erosion and sedimentation runoff.		
Mitigation Measures			
One or more of the following measures to control soil erosion and sedimentation will be implemented: • The area disturbed by clearing, grading, earth moving, or excavation operations will be as small as feasible to prevent excessive dust. • Pregrading/excavation activities will include watering the area to be graded or excavated before commencement of grading or excavation. Application of water will penetrate sufficiently to minimize fugitive dust during grading activities. • Trucks will be required to have their loads covered going offsite. • Graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved onsite roadways, will be treated to prevent fugitive dust. Treatment will include, but not be limited to, periodic watering and/or roll compaction as appropriate. Watering will be done at least twice daily. • Inactive graded and/or excavated areas will be monitored at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction will be periodically implemented over portions of the construction site that are inactive for over 4 days. • During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), clearing, grading, earth-moving, and excavation operations will be curtailed to the degree necessary to prevent fugitive dust created by onsite activities and operations from being a nuisance or hazard to offsite properties. • Adjacent streets and roads impacted by project fugitive dust will be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads. • A Storm Water Pollution Prevention Plan (SWPPP) will be developed and implemented that will include Best Management Practices (BMPs) to minimize conveyance of sediment into waterways. The SWPPP may include some or all of the following or any other measure necessary: - V-ditches will be constructed above all cut or fill slopes to divert water from newly exposed slope faces. - Straw bale dikes or filter fabric barriers will be located downslope of disturbed areas to act as sediment traps. - Topsoil will be selectively removed, stockpiled, and replaced as a surface medium for revegetation. - Exposed slope faces will be revegetated as soon after construction as possible. - Temporary sedimentation basins will be constructed as necessary.		
Monitoring Action	Mitigation measures will be clearly specified by the LADWP during contract preparation. LADWP field engineers will conduct onsite inspection and monitoring of contractor compliance.		
Responsible Party	**Timing**	**Monitoring Agency**	
LADWP Construction Contractor	Contact Preparation Construction Post-construction	LADWP	

SLRC and Vicinity MMP		
Resource Area	Earth Resources	
Potential Impact	Mapped faults exist in the vicinity of the bypass pipeline route, regulating station, and in areas where construction would occur to take the reservoirs out of service.	
Mitigation Measures		
• Facilities will be designed according to seismic standards as determined by geotechnical and seismic hazard analyses. The analyses will be based on site-specific subsurface investigations and ground motion design recommendations. • Appropriate geotechnical soil testing will be performed during the design phase so that the proposed grading and facilities can be properly designed to meet applicable structural and seismic requirements. • If adverse slopes are encountered, slope stability will be analyzed; and slope stabilization measures will be established during design to minimize the potential for landslide damage. • Cuts and fill slopes will not exceed a 2:1 (horizontal:vertical) ratio except for cuts directly into bedrock where steeper slopes may be safely obtained. • Analyses of slope stability will be made in areas where cuts into marginal or adversely dipping slopes are required for construction of proposed facilities to minimize the potential for landslide damage.		
Monitoring Action	Geologic reports and plans for structures and grading will be submitted by the LADWP to the City of Los Angeles – Department of Building and Safety (LADBS) and to DSOD as part of the process for obtaining required permits ensuring conformance to City seismic and building codes.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP LADBS DSOD	Project Design Pre-construction Construction	LADWP LADBS

SLRC and Vicinity MMP		
Resource Area	Water Resources	
Potential Impact	During construction, short-term impacts to surface water quality could occur at the site in the event of drainage from precipitation that would potentially result in erosion. Changes in topography and the presence of excavated and/or unprotected soil could all affect stormwater runoff.	
Mitigation Measures		
• The project will obtain an NPDES Municipal Stormwater General Construction Permit (General Permit), and comply with all permit requirements. • A SWPPP will be developed and implemented that will include BMPs to minimize conveyance of sediment into waterways. The SWPPP may include some or all of the following or any other measure necessary: - V-ditches will be constructed above all cut or fill slopes to divert water from newly exposed slope faces. - Straw bale dikes or filter fabric barriers will be located downslope of disturbed areas to act as sediment traps. - Topsoil will be selectively removed, stockpiled, and replaced as a surface medium for revegetation. - Exposed slope faces will be revegetated as soon as possible after construction. - Temporary sedimentation basins will be constructed as necessary. • Interim grading and other measures specified by the Los Angeles City erosion control ordinances will be employed to mitigate any short-term flooding due to stormwater.		
Monitoring Action	LADWP will ensure that an NPDES Permit and SWPPP is developed, approved by the Regional Water Quality Control Board, and followed by the construction contractor. LADWP field engineers will conduct onsite inspection and monitoring of contractor compliance.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Construction Contactor	Project Design Pre-construction Construction Post-construction	LADWP LADBS Regional Water Quality Control Board

SLRC and Vicinity MMP	
Resource Area	Biological Resources
Potential Impact	The SLRC supports lacustrine habitat (open lake) that is utilized by roosting waterfowl, primarily during the migratory season. To minimize construction impacts to these resources, the following measures would be implemented as applicable during construction.

Mitigation Measures

The following Best Management Practices (BMPs) will be implemented as applicable during construction at the SLRC:

- Worker environmental awareness training for construction personnel will be provided to identify sensitive biological resources that may occur in construction areas, and identify measures required to minimize Proposed Project impacts during construction and operation. Ongoing environmental monitoring will be provided by LADWP to ensure compliance with environmental requirements throughout the construction phase of the Proposed Project.
- Preconstruction surveys by qualified biologists will be implemented for special-status species in impact areas prior to beginning ground-disturbing activities; and, if necessary and feasible, resource relocation or exclusion will be implemented. Resource relocation will be conducted by qualified biologists in coordination with CDFG or USFWS. Exclusion zones will be implemented with fencing and/or signage that restricts access.
- The boundaries of the construction area within the Proposed Project site will be marked with stakes and flags. No construction activities, vehicular access, equipment storage, stockpiling, or significant human intrusion will occur outside the designated construction area.
- Proposed Project ingress and egress routes will be designated and flagged or staked, and vehicle traffic outside these routes will not be allowed. Vehicular traffic will adhere to a speed limit of 15 mph during construction to ensure avoidance of impacts to sensitive biological resources on access roads.
- Lighting for construction activities conducted during nighttime hours will be minimized to the extent possible through the use of directional shading to protect nocturnal wildlife activities. Construction later than 8:00 p.m. is not anticipated for the Proposed Project.
- Construction sites will be monitored daily to pick up trash and litter. Food-related trash and litter will be placed in closed containers and disposed of daily. Pets will be prohibited in the construction area.
- Intentional killing or collection of either plants or wildlife at construction sites will be prohibited, except as necessary and/or addressed elsewhere in this document. Discharging of firearms will be prohibited on construction sites.
- Only agency-approved pesticides, herbicides, fertilizers, dust suppressants, or other potentially harmful materials will be applied within the construction area, in accordance with relevant state and federal regulations.
- Soil or invasive plant seed transfer from clothing, shoes, or equipment will be minimized through cleaning and monitoring of personnel or equipment transfers between sites, or prior to initial entry on the site, as necessary.
- In habitats where nesting birds might occur, vegetation removal will occur outside the bird breeding season (February 1 to August 31), as feasible, to avoid take or disturbance that would cause abandonment of active nests containing eggs and/or young. If Proposed Project activities cannot avoid the bird breeding season, nest surveys will be conducted and active nests avoided and provided with a minimum buffer as determined by a biologist. For active raptor nests, this buffer will be a minimum of 500 feet.
- In habitats where roosting bats might occur, ground disturbance and roost destruction will be avoided during the parturition period (March 15 through August 31). Where this is not feasible, exit surveys and/or roost surveys of potential roost sites will occur; and active roosts will be flagged. Construction activity within 300 feet of active roosts will be prohibited until the completion of parturition (end of August). Alternatively, if potential roosts are identified prior to onset of parturition, roosts may be excluded during the evening forage period (within 4 hours after dark) or fitted with one-way exit doors to effectively eliminate and exclude roost.

SLRC and Vicinity MMP	
Resource Area	Biological Resources
Potential Impact	The SLRC supports lacustrine habitat (open lake) that is utilized by roosting waterfowl, primarily during the migratory season. To minimize construction impacts to these resources, the following measures would be implemented as applicable during construction.

Mitigation Measures

- A revegetation plan will be prepared for all areas where bare ground is left exposed by construction activities. The revegetation plan will consist of container stock and/or seed of plants native to historical conditions at the Proposed Project sites, including grassland, riparian, scrub, and woodland species native to the Santa Monica Mountains and/or LA River corridor. The plan will specify application methods and quantities, performance criteria, and monitoring requirements.
- Only permitted, authorized construction vehicles that have been inspected to ensure fire safety requirements on the construction sites will be allowed. Vehicles will be equipped with catalytic converters with shielding or other acceptable fire prevention features. Camping, trash-burning fires, and warming fires will be prohibited in the construction area.
- Equipment will not be operated in areas of ponded or flowing water, and no wet excavations will be performed during construction in ponds or stream beds. Stationary equipment such as motors, pumps, generators, and welders will be located a minimum of 200 feet outside CDFG and USACE jurisdictional drainages. Construction staging areas, stockpiling, and equipment storage will be located a minimum of 100 feet outside CDFG and USACE jurisdictional drainages.
- Construction vehicles and equipment will be checked periodically to ensure that they are in proper working condition and that there will be no potential for fugitive emissions of oil and other hazardous products. Refueling or lubrication of vehicles and cleaning of equipment, or other activities that involve open use of fuels, lubricants, or solvents, will occur in upland locations at least 500 feet away from CDFG and USACE jurisdictional drainages, and at least 200 feet from other flagged, sensitive biological resources.
- The Proposed Project will obtain an NPDES Municipal Stormwater General Construction Permit (General Permit), and comply with all permit requirements. As part of the permit requirements, an SWPPP will be prepared for the Proposed Project. The SWPPP will provide detailed descriptions of the various structural and nonstructural water quality management measures to be used, and may include construction BMPs; downstream water quality monitoring and use of permanent source-control BMPs; and treatment control BMPs, which may include installation of filters, straw bale barriers, silt fences, and treatment wetlands. These structures will be located outside CDFG and USACE jurisdictional drainages.
- A Mitigation Monitoring Plan that outlines how LADWP will implement and monitor the mitigation measures specified herein will be prepared, and construction monitoring and compliance reports that analyze the effectiveness of the mitigation measures will be prepared.

Monitoring Action	LADWP will retain a qualified biological monitor to prepare a biological resources Mitigation Monitoring Plan that incorporates the above BMPs and other biological resources mitigation measures at the SLRC. The biological monitor will also prepare construction monitoring and compliance reports. Mitigation measures will be clearly specified by the LADWP during contract preparation. LADWP field engineers and the biological monitor will conduct onsite inspection and monitoring of contractor compliance.

Responsible Party	Timing	Monitoring Agency
LADWP Biological Monitor Construction Contractor	Contract Preparation Pre-construction Construction Post-construction	LADWP CDFG USFWS USACE

<table>
<tr><th colspan="4">SLRC and Vicinity MMP</th></tr>
<tr><td>Resource Area</td><td colspan="3">Biological Resources</td></tr>
<tr><td>Potential Impact</td><td colspan="3">Disruption to nesting great blue heron or other ardeids or breeding special-status birds would represent a significant adverse impact.</td></tr>
<tr><th colspan="4">Mitigation Measures</th></tr>
<tr><td colspan="4">Preconstruction surveys for nesting special-status birds will be conducted at the SLRC prior to ground-disturbing activities. Depending on the results of these surveys, the following mitigation measures will be implemented:

1. All vegetation removal required for the Proposed Project will occur prior to the nesting season for most birds (February to August) to avoid direct impacts to nesting birds.

2. Where nests for special-status birds are established within 500 feet of surface construction activities, construction will be delayed until (a) fledglings leave the nest and are independent of adults or (b) it is determined by CDFG that no adverse effects are likely to occur to the nest or brood from adjacent construction activities, and a Biological Monitor is provided to conduct construction monitoring to ensure that effects on the nest site or brood do not reach adverse levels.

3. Construction adjacent to the known heron rookery at Silver Lake will be avoided during the nesting season for herons (February to August).</td></tr>
<tr><td>Monitoring Action</td><td colspan="3">The District will retain a qualified biologist to conduct a reconnaissance–level site survey prior to construction and implement mitigation measures.

LADWP will retain a qualified biological monitor to prepare a biological resources Mitigation Monitoring Plan that incorporates BMPs and other biological resources mitigation measures at the SLRC. The biological monitor will also prepare construction monitoring and compliance reports.</td></tr>
<tr><th>Responsible Party</th><th>Timing</th><th colspan="2">Monitoring Agency</th></tr>
<tr><td>LADWP
Biological Monitor
Construction Contractor</td><td>Pre-construction
Construction</td><td colspan="2">LADWP
CDFG</td></tr>
</table>

<table>
<tr><th colspan="3">SLRC and Vicinity MMP</th></tr>
<tr><td>Resource Area</td><td colspan="2">Biological Resources</td></tr>
<tr><td>Potential Impact</td><td colspan="2">Construction activities at the SLRC may result in impacts to special-status bats when roost sites are located near construction disturbance areas.</td></tr>
<tr><th colspan="3">Mitigation Measures</th></tr>
<tr><td colspan="3">Preconstruction surveys for bat roosts will be conducted at the SLRC prior to ground-disturbing activities. Where active roosts are identified during these surveys, the following mitigation measures will be implemented:
• Within 300 feet of the location of active roosts, ground disturbance and roost destruction will be avoided during the parturition period (March 15 through August 31).
• Where this avoidance is not feasible, if potential roosts are identified prior to onset of parturition, roosts may be removed during the evening forage period (within 4 hours after dark) or fitted with one-way exit doors to effectively eliminate and exclude roost.</td></tr>
<tr><td>Monitoring Action</td><td colspan="2">LADWP will retain a qualified biologist to conduct a reconnaissance–level site survey prior to construction and implement mitigation measures.

LADWP will retain a qualified biological monitor to prepare a biological resources Mitigation Monitoring Plan that incorporates BMPs and other biological resources mitigation measures at the SLRC. The biological monitor will also prepare construction monitoring and compliance reports.</td></tr>
<tr><th>Responsible Party</th><th>Timing</th><th>Monitoring Agency</th></tr>
<tr><td>LADWP
Biological Monitor
Construction Contractor</td><td>Pre-construction
Construction</td><td>LADWP
CDFG</td></tr>
</table>

SLRC and Vicinity MMP	
Resource Area	Archaeological Resources
Potential Impact	The potential for discovery of prehistoric or historical archaeological sites at the SLRC is considered to be low; however, impacts may be potentially significant if sites are found.

Mitigation Measures

Potential impacts to cultural resources related directly or indirectly to Proposed Project-related activities will be reduced to below the level of significance through recovery or treatment of archaeological resources encountered during archaeological site investigations or monitoring of ground-disturbing activities (construction) in areas with the potential to contain archaeological resources.

When investigations identify unique archaeological resources as defined in Section 21083.2 of the Public Resources Code (PRC), the site will be subject to specified requirements for treatment. Where elements of the Proposed Project are expected to require earthmoving, the following program will be implemented and the requirement duly noted in Proposed Project plans and specifications:

- Retain a qualified archaeologist to implement a monitoring and recovery program in any area identified as having the potential to contain unique archaeological resources.
- A qualified archaeologist will monitor earth-moving activities in areas that are likely to contain unique archaeological resources. The archaeologist will be authorized to halt construction, if necessary, in the immediate area where buried cultural remains are encountered. Prior to the resumption of grading activities in the immediate vicinity of the cultural remains, the project proponent will provide the archaeologist with the necessary resources to identify and implement a program for the appropriate disposition as specified by Section 15064.5(e) of the CEQA Guidelines.
- The selected archaeologist will be required to secure a written agreement with a recognized museum repository regarding the final disposition and permanent storage and maintenance of any unique archaeological resources recovered as a result of the archaeological monitoring. This would also include corresponding geographic site data that might be recovered as a result of the specified monitoring program. The written agreement for the disposition of recovered artifacts will specify the level of treatment (preparation, identification, curation, cataloging) required before the collection would be accepted for storage.
- The selected archaeologist will attend a preconstruction meeting to provide information regarding regulatory requirements for the protection of unique archaeological resources. Construction personnel will be trained on procedures to be followed in the event that a unique archaeological resource is encountered during construction. In addition, the archaeologist will ensure that the preconstruction meeting participants are trained to notify the Los Angeles County Medical Examiner (coroner) within 24 hours of the discovery of human remains. Upon discovery of human remains, there will be no further excavation or disturbance of the site or any reasonably nearby area suspected to overlie adjacent human remains until the following conditions are met:
    - The Los Angeles County Medical Examiner has been informed and has determined that no investigation of the cause of death is required; and, if the remains are of Native American origin, the descendants of the deceased Native Americans have made a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98.

If archaeological sites are encountered during construction of the Proposed Project, an evaluation of significance will be made by the selected archaeologist. Those sites that are determined eligible for listing in the California Register of Historical Resources (CRHR) will be treated in accordance with one of the three feasible measures described in the "CEQA and Archaeological Resources," CEQA Technical Advice Series:

- Capping (covering) the site with a level of soil prior to construction over the site
- Incorporating into open space areas of the project site
- Excavating where the first two measures are not feasible

For eligible sites, the City of Los Angeles will, prior to construction, implement the applicable treatment plan.

SLRC and Vicinity MMP		
Resource Area	Archaeological Resources	
Potential Impact	The potential for discovery of prehistoric or historical archaeological sites at the SLRC is considered to be low; however, impacts may be potentially significant if sites are found.	
Mitigation Measures		
Monitoring Action	LADWP will retain a qualified archaeologist to monitor excavation activities and implement a monitoring and recovery program in any area identified as having the potential to contain unique archaeological resources. The archaeologist will have the authority to temporarily suspend excavation if archaeological resources are encountered.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Archaeologist Construction Contractor	Construction – excavation activities	LADWP

SLRC and Vicinity MMP			
Resource Area	Archaeological (Historical) Resources		
Potential Impact	Areas at and surrounding the SLRC contain landscaping that contributes to the historic character of the SLRC that may be disturbed or removed during construction. Impacts to this landscaping would result in potentially significant impacts.		
Mitigation Measures			
Landscaping of the 30,000-square-foot, open, grassy area located at the southwest corner of the SLRC, the proposed location of a jacking pit, pipeline, concrete vaults for a regulating station, and other new facilities will be returned to an appearance approximating preconstruction conditions, insofar as is possible, prior to removal of Ivanhoe and Silver Lake Reservoirs from service to the water distribution system. Where avoidance or transplantation of onsite trees and other vegetation is not possible, the proposed regulating station area should be landscaped with mature, healthy trees and plant material of comparable species, in keeping with the historic character and appearance of these portions of the reservoir complex. In areas where planting of trees and other large vegetation would impede operation of the new facilities, grass will be replanted over the buried structures, approximating the current appearance of the site inasmuch as that is practicable. Insofar as is possible, landforms will be returned to their preconstruction topography. The *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Cultural Landscapes* should be employed to mitigate potential impacts to the existing landscaping resulting from construction activities. The same mitigation measure will be employed for impacts related to the removal or degradation of landscaping in the area designated for equipment and material staging, within the former East Cove area. Landscape rehabilitation will be performed in coordination with the Property Maintenance and Management Plan for the SLRC.		
Monitoring Action	LADWP will retain a landscape architect qualified to employ the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Cultural Landscapes*.		
Responsible Party	**Timing**	**Monitoring Agency**	
LADWP Landscape Architect	Post-construction	LADWP	

SLRC and Vicinity MMP			
Resource Area	Paleontologic Resources		
Potential Impact	Earth-disturbing activities at the SLRC could potentially reveal paleontologic resources.		
Mitigation Measures			
• Earth-moving activities that have a potential for disturbing previously undisturbed strata identified as being paleontologically important will be monitored by a paleontologic construction monitor. If fossil remains are encountered, they will be recovered, along with associated specimen data and corresponding geologic and geographic site data. The level of monitoring will reflect the paleontologic importance/impact sensitivity of the rock unit underlying the area of disturbance and the type of earth-moving activity. • If fine-grained strata with a potential for containing microfossils or small fossil remains are encountered, rock/sediment samples will be collected and processed to allow for the recovery of these fossil remains. • If necessary, earth-moving activities will be diverted temporarily around a fossil/sampling locality until the fossil remains/sample has been removed. • If warranted, rock/sediment or fossil samples will be submitted to commercial laboratories for microfossil and pollen identification, or radiometric dating analysis. • Recovered fossil remains will be prepared to the point of identification, identified by knowledgeable paleontologists, curated, catalogued with Natural History Museum of Los Angeles Vertebrate Paleontology Department (LACMVP) fossil specimen and locality numbers, and transferred to the LACMVP for permanent storage. • A final technical report of results and findings will be prepared by the paleontologist. • Paleontologic monitoring of construction at the SLRC will be conducted during the periods that ground-disturbing activities are ongoing at depths greater than 5 feet, and are occurring within Quaternary alluvium or Miocene marine sediments. With the exception of the excavations for the cut-and-plug operations, expected to occur only within artificial fill, all excavations to depths greater than 5 feet may affect paleontologically sensitive sediments. Therefore, these excavations will be monitored *except* in cases where it can be conclusively demonstrated that artificial fill occurs at depths exceeding 5 feet; and that the excavations are, therefore, occurring in sediments with no paleontologic sensitivity. • Monitoring will be conducted by a trained paleontologic monitor under the direction of a professional paleontologist. Monitoring will consist of inspection of debris and backdirt generated by excavations, as well as exposed sediment profiles when safely accessible. Boring and drilling operations will be spot monitored, and will be full-time monitored should fossils be encountered. All other excavations in paleontologically sensitive sediments will be subjected to full-time paleontologic monitoring.		
Monitoring Action	LADWP will retain a qualified paleontologist to monitor excavation activities as described above. The paleontologist will have the authority to temporarily suspend excavation activities.		
Responsible Party	**Timing**	**Monitoring Agency**	
LADWP Paleontologist Construction Contractor	Construction – specific excavation activities	LADWP	

SLRC and Vicinity MMP		
Resource Area	Traffic and Transportation	
Potential Impact	At the SLRC, construction traffic would potentially have a significant adverse impact at the intersection of Silver Lake Boulevard and Van Pelt Place.	
Mitigation Measures		
Truck deliveries for materials or equipment will be scheduled so that truck trips will arrive or depart the SLRC outside the afternoon peak period between 4:00 p.m. and 6:00 p.m.		
Monitoring Action	Mitigation measures will be clearly specified by the LADWP during contract preparation. LADWP field engineers will monitor contractor compliance with employee work schedule staggering.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Construction Contractor	Contract Preparation Construction	LADWP

SLRC and Vicinity MMP		
Resource Area	Traffic and Transportation	
Potential Impact	At the SLRC, construction traffic would potentially have a significant adverse impact at the intersection of Riverside Drive and Fletcher Drive.	
Mitigation Measures		
Truck deliveries for materials or equipment will be scheduled so that truck trips will arrive or depart the SLRC outside the afternoon peak period of between 4:00 p.m. and 6:00 p.m.		
Monitoring Action	Mitigation measures will be clearly specified by the LADWP during contract preparation. LADWP field engineers will monitor contractor compliance with employee work schedule staggering.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Construction Contractor	Contract Preparation Construction	LADWP

SLRC and Vicinity MMP			
Resource Area	Traffic and Transportation		
Potential Impact	At the SRC, in-street construction is required for the jacking and receiving pits for the bypass pipeline, for construction of the relief stations, and potentially for the regulating station trunk line.		
Mitigation Measures			
A site-specific transportation management plan (TMP) will be prepared for any stage of construction that may affect traffic flow in the surrounding street system. This plan may include some or all of the following: • Construction work traffic impacts and strategies, including detours and traffic handling. • Strategies for reducing worker trips, including carpooling and transit. • General access restrictions associated with the Proposed Project, including proper notification of affected residences, businesses, and other facilities prior to construction. Advance public notification will include posting of notices and appropriate signage of construction activity. The TMP must ensure adequate access to residences and facilities via existing roadway intersections and private driveways at all times or include alternate access, detours, or temporary mitigation to address access restrictions adequately. • Emergency access restrictions associated with the Proposed Project, including proper notification of emergency providers and provision of alternate routes, if necessary. All construction activities will be coordinated with local law enforcement, fire protection, and other emergency service providers. These entities will be notified of the timing, location, and duration of construction activities. • Where construction will result in temporary lane closures of sidewalks and other pedestrian facilities, the TMP will address temporary pedestrian access, through detours or safe areas alongside the construction zone. Any affected pedestrian facilities and alternative facilities or detours will be identified. The development of this plan will be coordinated with Los Angeles Department of Transportation (LADOT) and Caltrans and will require LADOT's approval prior to the implementation of any measures and activities that would affect traffic flow in the area.			
Monitoring Action	LADWP will coordinate with LADOT and Caltrans to develop and implement a TMP for in-street construction.		
Responsible Party	**Timing**	**Monitoring Agency**	
LADWP LADOT Construction Contractor	Contract Preparation Pre-construction Construction	LADWP LADOT	

SLRC and Vicinity MMP		
Resource Area	Noise	
Potential Impact	Construction noise produced by onsite machinery may produce levels that exceed ambient noise levels by 5 decibels (dBs) at the SLRC, resulting in significant impacts.	
Mitigation Measures		
Measures to minimize noise from construction activities at the SLRC include some or all of the following: • A noise monitoring and mitigation program at the SLRC will be instituted to continuously assess construction noise impacts and implement mitigation when and where required. The program will focus primarily on ensuring no hazardous noise levels exist at nearby residences. Long-term (all day) monitoring should be conducted to verify that noise levels at sensitive receptors do not exceed permissible limits as determined by the appropriate authority. • Construction areas will be shielded with noise control barriers, particularly the area surrounding the regulating station. Barriers may be of any configuration sufficient to control the immediate noise levels; specifically, they should be heavy, continuous (no gaps), and have a sound-absorptive surface on the construction side. Typical construction sound barriers include 3/4-inch plywood with a glass or mineral wool facing, commercially available post-and-panel noise-control fencing, and commercially available noise-control curtains. Barrier height will be as tall as can be practically and safely erected, but should be a minimum of 8 feet high. Entrances to the noise-controlled areas will be located away from sensitive receivers. If feasible, the entrance to the regulating station area will be to the east or southeast (facing the dog park). • Use of extreme noise producers will be minimized as much as possible because aggregate noise levels are generally driven by a few loud machines. Every effort will be made to complete such activities in a timely manner, rather than extending them over the duration of construction. Where feasible, they will be shielded by a sound barrier and located as far as possible from noise-sensitive receivers. Where feasible, such activities will be conducted offsite at a nonsensitive location. • Fixed-location machinery, such as generators and compressors, will be shielded from sensitive receivers. Shielding may comprise any arrangement that produces substantial noise reductions including manufactured enclosures; plywood barriers; terrain (berms, dirt piles); and other large, fixed-location machinery. • Activities that may be performed at a fixed location (e.g., sawing lumber) will be shielded similar to the fourth measure above. • Equipment maintenance and testing facilities at the staging area will be shielded similar to the second measure above. • Machinery will be equipped with high-performance mufflers and other noise-reducing equipment. Machinery will be maintained in good running condition, including frequent lubrication to minimize squealing and additional engine load, to reduce annoying noise emissions. • Loudest operations in the late afternoons and evenings, particularly after 7:00 p.m., will be avoided. • Noise-producing equipment maintenance and testing at the staging area in the evenings, particularly after 7:00 p.m., will be avoided. Testing of loud machinery will be scheduled to coincide with peak morning and afternoon traffic hours, if possible. • Unnecessary equipment will be shut down overnight (e.g., blowers or generators will not be left running unnecessarily). • Construction hours will be strictly enforced. The staging area will be secured with a locked fence to prevent early startup or late-night maintenance.		
Monitoring Action	Mitigation measures will be clearly specified by the LADWP during contract preparation. LADWP field engineers will conduct onsite inspection and monitoring of contractor compliance.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Construction Contractor	Contract Preparation Construction	LADWP

SLRC and Vicinity MMP		
Resource Area	Noise	
Potential Impact	Noise produced by the regulating station at the SLRC is anticipated to exceed ambient noise levels by more than 5 dBs, resulting in a significant impact.	
Mitigation Measures		
Sufficient technology currently exists to reduce noise levels from the regulating station to a less-than-significant level. However, given that project operation is not anticipated to begin until late 2013, identification of specific sound-reducing measures is not practical because sound-reduction technology is constantly evolving and advancing (i.e., more sophisticated sound-reduction technology is anticipated to be available in the future than is available today). LADWP will include technologically advanced sound-reduction measures in its detailed design of the regulating station equipment and/or enclosure materials to ensure that the regulating station will produce noise levels no more than 40 dBA at the nearest residence.		
Monitoring Action	During detailed design of the regulating station, LADWP will identify appropriate sound-reduction technology.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP	Project Design	LADWP

SLRC and Vicinity MMP			
Resource Area	Air Quality		
Potential Impact	Construction activity at the SLRC will result in fugitive construction emissions.		
Mitigation Measures			
To minimize construction emissions, the Proposed Project will implement standard construction practices. Fugitive dust produced during grading, excavation, and construction activities will be controlled pursuant to South Coast Air Quality Management District Rule 403. SCAQMD recommends minimizing fugitive dust (PM_{10} emissions) during all construction activities. The following measures will be implemented: • The area disturbed by clearing, grading, earth moving, or excavation operations will be as small as feasible to prevent excessive dust. • Pregrading/excavation activities will include watering the area to be graded or excavated before commencement of grading or excavation. Application of water (reclaimed, if available) will penetrate sufficiently to minimize fugitive dust during grading activities. • Trucks will be required to have their loads covered as required by the SCAQMD. • Graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved onsite roadways, will be treated to prevent fugitive dust. Treatment will include, but not be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering will be done at least twice daily. • Inactive graded and/or excavated areas will be monitored at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction and application of environmentally safe dust control materials, will be periodically implemented over portions of the construction site that are inactive for over 4 days. • Signs will be posted limiting traffic to 15 mph or less. • During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), clearing, grading, earth moving, and excavation operations will be curtailed to the degree necessary to prevent fugitive dust created by onsite activities and operations from being a nuisance or hazard to offsite properties. • Adjacent streets and roads impacted by project fugitive dust will be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads. Each of the aforementioned PM_{10} measures is assumed to be included in the SCAQMD Rule 403 – Dust Control Plan required for this Proposed Project. These combined measures are assumed to reduce fugitive PM_{10} by 50 percent, and are accounted for in the maximum daily and quarterly emissions calculated.		
Monitoring Action	LADWP will obtain and comply with the SCAQMD Rule 403 – Dust Control Plan. Mitigation measures will be clearly specified by the LADWP during contract preparation. LADWP field engineers will conduct onsite inspection and monitoring of contractor compliance.		
Responsible Party	**Timing**	**Monitoring Agency**	
LADWP Construction Contractor	Contract Preparation Pre-construction Construction	LADWP SCAQMD	

SLRC and Vicinity MMP		
Resource Area	Air Quality	
Potential Impact	Construction emissions are anticipated to exceed maximum daily levels for NO_x and PM_{10} at the SLRC. When construction emissions for both Proposed Project sites are combined, construction emissions are anticipated to exceed significance thresholds for ROG, NO_x, and PM_{10}.	
Mitigation Measures		
The following measures will be implemented to reduce construction-related air quality impacts during project construction: • Equipment idling time will be minimized to the extent possible. • Equipment engines will be maintained in good condition and in proper tune in accordance with manufacturer specifications. • Electricity from onsite power poles will be used, as feasible, in place of temporary diesel-powered generators. • All construction equipment powered by diesel fueled internal combustion engines will utilize emulsified diesel fuel. The use of such fuel has been demonstrated by the California Air Resources Board to reduce NO_x by 14 percent and reduce PM_{10} (from engine combustion) by 63 percent.		
Monitoring Action	Mitigation measures will be clearly specified by the LADWP during contract preparation. LADWP field engineers will conduct onsite inspection and monitoring of contractor compliance.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Construction Contractor	Contract Preparation Pre-construction Construction	LADWP

SLRC and Vicinity MMP		
Resource Area	Visual Resources	
Potential Impact	The following measures have been included as part of the Proposed Project during construction at the SLRC.	
Mitigation Measures		
• Night lighting of the construction site and staging area will be limited to that required for safety and security, and lights will be directed to minimize offsite light-spill.		
Monitoring Action	The measure will be clearly specified by the LADWP during contract preparation. LADWP field engineers will conduct onsite inspection and monitoring of contractor compliance.	
Responsible Party	**Timing**	**Monitoring Agency**
LADWP Construction Contractor	Contract Preparation Pre-construction Construction	LADWP

Appendix B
Comment Letter Received After Close of Comment Period

CITY OF LOS ANGELES
CALIFORNIA

OFFICE OF THE
BOARD OF PUBLIC WORKS
200 NORTH SPRING ST.
Room 361, CITY HALL
LOS ANGELES, CA 90012

JAMES A. GIBSON
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http://www.lacity.org/BPW

October 12, 2005

Mr. Anselmo G. Collins
DWP, Manager of Water Master Planning
111 N. Hope Street
Los Angeles, CA 90012-2607

Dear Mr. Collins:

SUBJECT: SILVER LAKE RESERVOIR STORAGE REPLACEMENT PROJECT DEIR

Thank you for the opportunity to review the Draft EIR for the Silver Lake Reservoir Complex Storage Replacement Project. I understand that the comment period for the DEIR is closed as of September 19, 2005. However, I would like to have this letter of comment included in the administrative record of the Environmental Impact Report for future reference.

The DEIR should reference the City's Integrated Resource Planning EIR, which is scheduled for publication later this year, as a related project. Water & Power/Public Works is the lead agency. Page 16-5 of the Silver Lake Reservoir DEIR states that an environmental document has not yet been prepared for the Glendale-Burbank Interceptor Sewer (GBIS) project. The IRP EIR referenced above addresses impacts associated with GBIS. Please note that if the Southern Alignment alternative is selected, then some increase in traffic impacts may occur on affected streets.

Additionally, in the Silver Lake area, the work performed at the Silver Lake Reservoir Complex must reference another component of the IRP EIR referring to the Northeast Interceptor Phase II (Western Alignment alternative), which is on Fletcher Ave and proceeds northerly on Riverside Drive to Los Feliz Blvd and beyond. If this alternative is selected, some increase in traffic may occur on these streets.

If you have any questions, please call me at (213) 847-8815.

Sincerely,

Ara Kasparian, Ph.D.
Manager of Environmental Management Group
650 S. Spring Street, Room 575
Los Angeles, CA 90014