

# **Response to Comments and Clarifications**

## **Pacoima Spreading Grounds Improvement Project City of Los Angeles, California**

**SCH No. 2016011026**

Prepared for	Los Angeles County Flood Control District 900 South Fremont Avenue Alhambra, California 91803-1331
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Prepared by	Psomas 225 South Lake Avenue, Suite 1000 Pasadena, California 91101 T: (626) 351-2000
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February 2021





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## SECTION 1.0 INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA)(*California Public Resources Code* Section 21000 et. seq.) and the State CEQA Guidelines (*California Code of Regulations*, Title 14, Section 15000 et. seq.), the potential environmental effects of the proposed Los Angeles County Flood Control District (LACFCD) Pacoima Spreading Grounds Improvement Project (Project) were analyzed in an Initial Study/Mitigated Negative Declaration (IS/MND or MND) dated January 2016, herein referred to as the 2016 MND, and subsequently, in a Recirculated IS/MND dated November 2018, herein referred to as the Recirculated MND (SCH No. 2016011026).

Section 15074(b) of the State CEQA Guidelines states that, prior to approving a project, the Lead Agency must consider the proposed MND together with any comments received during the public review process. The LACFCD, as the Lead Agency, must adopt the proposed MND only if it finds, on the basis of the whole record before it, that there is no substantial evidence that the Project would have a significant effect on the environment and that the MND reflects the Lead Agency's independent judgment and analysis.

Although CEQA does not require written responses to comments on an MND, Section 2.0, Responses to Comments on the 2016 MND, and Section 3.0, Responses to Comments on the Recirculated MND, of this document provides all letters, e-mails, and other correspondence (collectively referred to as letters herein) received during both the 2016 MND and 2018 Recirculated MND public review periods and written responses to all comments received in light of the revised Project.

Section 4.0, Clarifications, of this document presents all corrections to the text, tables, figures, and/or appendices of the 2016 MND and/or the Recirculated MND generated either from responses to comments or independently by the LACFCD, as the Lead Agency. Section 4.0 also addresses changes made to the Environmental Checklist in Appendix G of the 2019 State CEQA Guidelines and the redesign of the intake canal to ensure appropriate long-term maintenance and operation.

### 1.1 CEQA AND PUBLIC REVIEW

#### 1.1.1 THE 2016 MITIGATED NEGATIVE DECLARATION PUBLIC REVIEW PROCESS

Upon completion of the 2016 MND, the public review was conducted in accordance with Sections 15072 and 15073 of the State CEQA Guidelines. To make the public and agencies aware of the Project's CEQA analysis, in January 2016, a *Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration* was prepared in English and in Spanish and distributed to the State Office of Planning and Research, State Clearinghouse and Planning Unit (State Clearinghouse); responsible and trustee agencies; organizations and interested parties, including the owners/occupants of all properties within an approximate 500-foot radius of the Project site based on the latest equalized assessment roll; and all parties who requested notice in accordance with CEQA. The NOI was filed with the Los Angeles County Registrar-Recorder/County Clerk in the City of Norwalk and published in the *Los Angeles Times*. The NOI was distributed for a 45-day public review period from January 11, 2016 through February 25, 2016. A public meeting to summarize the findings of the 2016 MND was held from 7:00 PM to 9:00 PM on January 28, 2016, at the Laborers' Local 300 Union Hall, 14800 Devonshire Street, Mission Hills, CA.

The 2016 MND and NOI, or the NOI only, was provided to 23 agencies, including 11 agencies notified via the State Clearinghouse; 574 organizations or individuals, including the surrounding property owners and/or occupants; and was e-mailed to an additional 16 organizations or

individuals, as the email was the available contact information. The NOI and 2016 MND were also made available for review at the Los Angeles County Public Works (LACPW) Headquarters (900 South Fremont Avenue, 11<sup>th</sup> Floor, Alhambra, California) and the Pacoima Branch Library during normal business hours, as well as online at <http://dpw.lacounty.gov/wrd/Projects/PacoimaSG>. A total of 7 comment cards collected by the individual attendees at the public meeting and subsequently mailed to the LACFCD, 18 comment letters and/or e-mails (collectively referred to as comment letters herein) from organizations and individuals, and 4 comment letters from agencies (including the standard receipt letter from the State Clearinghouse) were received during the public review period. One comment letter was received after the comment period; this comment letter is included in these responses to comments. The LACFCD's responses to comments on the 2016 MND are provided in Section 2.0; and any clarifications associated with these responses to comments are provided in Section 4.0, of this document.

### **1.1.2 RECIRCULATED MND PUBLIC REVIEW PROCESS**

Pursuant to Section 15073.5 of the State CEQA Guidelines, because the changes to the Project are considered "substantial revisions" and the January 2016 MND had not been adopted by the LACFCD, a Recirculated MND was prepared to disclose the revised Project description and analyze the environmental impacts. The changes identified in the Recirculated MND and its associated technical appendices replace and supersede previous CEQA documentation, including the 2014 Initial Study and the 2016 MND.

Upon completion of the Recirculated MND, the public review was conducted in accordance with Sections 15072 and 15073 of the State CEQA Guidelines. In November 2018, an NOI was prepared in English and in Spanish, and distributed to the State Clearinghouse; responsible and trustee agencies; organizations and interested parties, including the owners/occupants of all properties within an approximate 500-foot radius of the Project site; and all parties who requested notice in accordance with CEQA. The NOI was filed with the Los Angeles County Registrar-Recorder/County Clerk in the City of Norwalk; and published in the *Los Angeles Times* on November 14, 2018 to announce the public review period. The NOI was distributed for a 30-day public review period, consistent with Section 15073(a) of the State CEQA Guidelines, from November 14, 2018 through December 13, 2018. Upon request from a member of the public to extend the review period to 45 days, the LACFCD extended the public review period to 48 days, formally accepting comments through December 31, 2018. A public meeting to summarize the findings of the Recirculated MND was held from 6:00 PM to 8:00 PM on November 29, 2018, at the Laborers' Local 300 Union Hall, 14800 Devonshire Street, Mission Hills, CA.

The Recirculated MND and NOI, or the NOI only, was provided to 20 agencies, including 11 agencies notified via the State Clearinghouse and 572 organizations or individuals, including the surrounding property owners and/or occupants. The same mailing list as the 2016 MND was used, with deletions for addresses that had been returned as undeliverable and additions of neighborhood councils and City Council representatives reflecting the revised haul routes. It was also made available for review at the LACPW Headquarters and the Pacoima Branch Library during normal business hours, as well as online at <http://dpw.lacounty.gov/wrd/Projects/PacoimaSG>.

A total of 7 comment cards from organizations and individuals collected at the public meeting; 10 comments letters from organizations and individuals; and 5 comment letters from agencies were received during the public review period. No comments were received after the comment period. The LACFCD's responses contained in these responses to comments on the Recirculated MND are provided in Section 3.0; and any clarifications associated with these responses to comments are provided in Section 4.0 as well as supplemental analyses.

### **1.1.3 CONCLUSION OF CEQA PROCESS**

The LACFCD has reviewed all comments received from agencies, organizations, and/or individuals to determine whether any substantial new environmental issues have been raised. Based on the evaluation in the Recirculated MND together with all comments received, the LACFCD has determined that no substantial new environmental issues have been raised that have not been adequately addressed in the Recirculated MND and/or in this Responses to Comments and Clarifications document. Additionally, after circulation of the Recirculated MND, the LACFCD determined that the intake canal design needed to be partially redesigned to ensure appropriate long-term maintenance of the facility. A description of the proposed intake canal design and an analysis of its environmental impacts compared to the findings of the Recirculated MND is presented in Section 4.0, Clarifications, of this document. Based on the responses to comments and the assessment of the proposed intake canal design, all potential impacts associated with the proposed Project were found to be less than significant with incorporation of relevant mitigation measures, where applicable. Therefore, the proposed Project would not result in any significant impacts, and an MND in accordance with CEQA is the appropriate environmental document for the proposed Project.

Thus, this document—which includes all public comment letters, the LACFCD responses, and assessment of Project refinements related to the intake canal design that occurred subsequent to circulation of the Recirculated MND—combined with the Recirculated MND, constitutes the Final MND for the proposed Project. All comments and responses thereto will be submitted to the Los Angeles County Board of Supervisors (Board), the decision-making body for the LACFCD, and the Board will consider the Recirculated MND together with the comments received during the public review process (from 2016 and 2018) in their decision making. The Board will adopt the proposed Recirculated MND and approve the proposed Project only if it finds that there is no substantial evidence that the Project will have a significant effect on the environment, in light of all evidence in the record including comments received, and that the Recirculated MND reflects the independent judgment and analysis of the LACFCD.

## **SECTION 2.0 RESPONSES TO COMMENTS ON THE 2016 MND**

Letters commenting on the information and analysis in the 2016 MND were received from the following parties during the public review period:

### **Agencies**

- State of California, State Clearinghouse and Planning Unit, February 26, 2016.
- State of California, Department of Fish and Wildlife, February 17, 2016.
- State of California, Department of Transportation, February 11, 2016.
- City of Los Angeles, Nury Martinez, Councilwoman, Sixth District, February 25, 2016.

### **Organizations**

- Pacoima Beautiful, February 25, 2016.
- Sun Valley Area Neighborhood Council, February 23, 2016.

### **Individuals**

- Yolie Anguiano, February 24, 2016.
- Benito Benny Bernal, January 5, 2016.
- Pamela Cardillo, February 24, 2016.
- Christine Greene, February 25, 2016.
- Michael J. Hillen, January 13, 2016.
- Betty Ley, February 25, 2016.
- Cliff Lobell, February 1, 2016.
- Elizabeth Marx, February 23, 2016.
- Paul Marx, PhD, February 9, 2016.
- Vera Marx, February 9, 2016.
- Susan Milne, February 25, 2016.
- Maria Polonski, February 24, 2016.
- Jim Read, February 25, 2016.
- Cindy Robles, February 20, 2016.
- Juan Salas, February 25, 2016.
- Walter and Wanda Shipe, January 21, 2016.

### **Comment Cards**

- Gary Aggas, President Sun Valley Area Neighborhood Council, January 28, 2016.
- Yolonda Anguiano, Project Manager to East San Fernando Valley Nature Parkway, January 28, 2016.
- Yahel Barredo, Francisco Deldago, and Elodia Tavarez, March 14, 2016.
- Kathy Grubert, January 28, 2016.
- Karen Martin, January 28, 2016.
- Mike O'Gara, January 28, 2016.
- Juan Salas, January 28, 2016.

The LACFCD's responses to all comments are provided below. Each comment letter is provided first, alphabetically, and is bracketed in the right margin with sequential numbers (e.g., SCH-1, SCH-2). Following the bracketed comment letter, the LACFCD's responses are presented in corresponding order to provide a matching numbered response on the pages following each comment letter.

Because some individuals provided comments on both the 2016 MND and the Recirculated MND, some individuals have the same last name, and/or some individuals have the same initials, to provide a unique identifier for each letter, the authors of all comment letters on the 2016 MND are abbreviated with last names and the authors of letters on the Recirculated MND are abbreviated with two initials. If there was more than one letter from an individual or the same last name on different letters, the abbreviation was then augmented with a numeral. For instance, if two persons had the initials AB, these would be represented as AB1 and AB2 for the Recirculated MND responses. If two persons had the last name Smith, these would be represented as ASmith and BSmith. Similarly, for those agencies that submitted a comment letter on both documents, the traditionally used abbreviations for these agencies are augmented with a numeral. For instance, California Department of Fish and Game, traditionally abbreviated as CDFW, is represented as CDFW1 for the 2016 MND comment letter and CDFW2 for the Recirculated MND comment letter. In all occurrences, the comment letter with the matching abbreviation immediately precedes the responses.

## **2.1 STATE, REGIONAL, AND LOCAL AGENCIES**

- State of California, State Clearinghouse and Planning Unit, February 26, 2016.
- State of California, Department of Fish and Wildlife, February 17, 2016.
- State of California, Department of Transportation, February 11, 2016.
- City of Los Angeles, Nury Martinez, Councilwoman, Sixth District, February 25, 2016.





EDMUND G. BROWN JR.  
GOVERNOR

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



KEN ALEX  
DIRECTOR

February 26, 2016

SCH

John Bodenchak  
Los Angeles County Flood Control District  
900 South Fremont Avenue  
Los Angeles, CA 91803

Subject: Pacoima Spreading Ground Improvement Project  
SCH#: 2016011026

Dear John Bodenchak:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 25, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

1

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

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

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

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

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2016011026  
**Project Title** Pacoima Spreading Ground Improvement Project  
**Lead Agency** Los Angeles County Flood Control District

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**Type** MND Mitigated Negative Declaration  
**Description** Note: Review Per Lead

The Project would involve several improvements to the existing facilities to increase the water holding capacity from 530 acre-feet; increase the percolation rate from 65 cubic feet per second to 142 cfs; eliminate localized flooding on Arleta Avenue; an efficiency of operations and maintenance. The improvements would include replacing the intake canal with underground pipe combining the basins to remove the underlying clay layer; and constructing new interbasin structures and an overflow structure. Approx. 1.6 million cubic yards of sediment would be excavated from the spreading basins; of this, approx. 1 be exported to 3 nearby gravel/sediment processing pits. The sediment export would generate up to 240 round trips from 14 cy to 180 round trips from 18-cy haul trucks per day, for a period of approx. 18 months beginning in Spring 2016.

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**Lead Agency Contact**

<b>Name</b>	John Bodenchak	
<b>Agency</b>	Los Angeles County Flood Control District	
<b>Phone</b>	626-458-6156	<b>Fax</b>
<b>email</b>		
<b>Address</b>	900 South Fremont Avenue	
<b>City</b>	Los Angeles	<b>State</b> CA <b>Zip</b> 91803

---

**Project Location**

<b>County</b>	Los Angeles
<b>City</b>	Los Angeles, City of
<b>Region</b>	
<b>Lat / Long</b>	34° 15' 26" N / 118° 26' 52" W
<b>Cross Streets</b>	Arleta Avenue and Paxton Street
<b>Parcel No.</b>	
<b>Township</b>	<b>Range</b> <b>Section</b> <b>Base</b> San Fern

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**Proximity to:**

<b>Highways</b>	I-5, 405
<b>Airports</b>	Airport
<b>Railways</b>	Metrolink
<b>Waterways</b>	Pacoima Wash
<b>Schools</b>	Several
<b>Land Use</b>	LACFCD Spreading Grounds/Open Space (OS-1XL-O)/Open Space

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

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**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services, California; Resources, Recycling and Recovery; Caltrans, District 7; Air Resources Board; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; State Lands

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

**Document Details Report**  
**State Clearinghouse Data Base**

Commission

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*Date Received* 01/11/2016      *Start of Review* 01/11/2016      *End of Review* 02/25/2016



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
www.wildlife.ca.gov

CEQA

2-25-16

E

EDMUND G. BROWN JR., Governor  
CHARLTON H. BONHAM, Director



Governor's Office of Planning & Research

FEB 17 2016

STATE CLEARINGHOUSE

February 17, 2016

Mr. John Bodenchak  
Los Angeles County Dept. of Public Works  
Water Resources Division, 2<sup>nd</sup> Floor  
900 S. Fremont Ave.  
Alhambra, CA 91803  
spreadinggrounds@dpw.lacounty.gov

**Subject: Comments on the Los Angeles County Department of Public Works' Mitigated Negative Declaration for the Pacoima Spreading Grounds Improvement Project, City of Los Angeles, Los Angeles County (SCH #2015401063)**

Dear Mr. Bodenchak:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Mitigated Negative Declaration (MND) for the Pacoima Spreading Grounds Improvement Project. The lead agency is the Los Angeles County Department of Public Works (LACDPW).

The 169-acre Project site is located within the City of Los Angeles in the north-central portion of the San Fernando Valley at the intersection of Paxton Street and Arleta Avenue. The site currently diverts water from Pacoima Wash into a surface water storage facility including 10 spreading basins and 2 desilting basins for a capacity of 530 acre-feet and a percolation rate of 65 cubic feet per second. The proposed Project would deepen and reconfigure the basins increasing the surface water storage capacity to 1,197 acre-feet and an increased percolation rate of 142 cubic feet per second. The Project would also eliminate the earthen bottom intake canal that moves water from Pacoima Wash to the basins, and replace it with four 54-inch diameter reinforced concrete pipes.

The following comments and recommendations have been prepared pursuant to the Department's authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*, and pursuant to our authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) to assist the Lead Agency in avoiding or minimizing potential project impacts on biological resources.

#### Specific Comments

- 1) Hydrology. The MND should include a discussion on how this project will reduce surface flows downstream of the Project. The Department is concerned reduced surface flows could negatively affect downstream biological resources. Specifically, the Department is concerned with the biological resources within the existing Glendale Narrows section of the Los Angeles River, as well as on-going and future restoration projects under the United States Army Corps of Engineers' approved Los Angeles River Ecosystem Restoration Plan. To enable the Department to comment on the Project's potential affects to biological resources, the following information should be included in the final MND:

*Conserving California's Wildlife Since 1870*

- Historical data for average monthly flows for Pacoima Wash both above and below the spreading basin diversion point, if possible broken down by source (natural flow, imported water).
  - A discussion of how the proposed Project will change the historical average monthly flows below the spreading grounds, including calculating the percentage of flow reduction anticipated from this Project.
  - A discussion regarding timing and duration of current diversions from Pacoima Wash into the basins and any minimum flow requirements for Pacoima Wash.
- 2) Cumulative Impacts: Increased diversion of water from Pacoima Wash may have considerable cumulative impacts on its tributary the Los Angeles River, as defined in CEQA Guidelines § 15065(a)(3) and § 15064(h)(1). The Department recommends the MND analyze all diversion points downstream of the proposed Project and determine how much water is being removed from the channel system and evaluate the significance of the Project's cumulative impacts to biological resources in the area and on the health and function of the downstream tributaries.
- 3) Ground-nesting Birds. The Project site contains suitable habitat for ground nesting birds including, killdeer (*Charadrius vociferous*), and the MND's biological report indicated an active killdeer nest was found on-site in March 2013.

The Department recommends the MND require that clearing of vegetation and construction occur outside of the peak avian breeding season, which generally runs from February 1st through September 1st. If project construction is necessary during the bird breeding season, a qualified biologist with experience in conducting bird breeding surveys should conduct weekly bird surveys for ground-nesting birds within three days prior to the work in the area, and ensure that no ground-nesting birds in the project area would be impacted by the project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer should be a minimum width of 300 feet, be delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

The Department recommends LACDPW develop a Killdeer Detection and Avoidance Plan for daily operation after construction monitoring is no longer needed. The Department recommends educating LACDPW staff to look out for ground nesting birds on dirt roads and earthen berms, how to properly avoid impacts to nests using appropriate buffers and fencing for protection.

Lake and Streambed Alteration Agreements (LSAA).

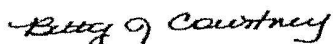
The Project site contains features and activities, including the replacement of the water diversion point and the undergrounding of the diversion channel that fall under Department LSA jurisdiction. As a Responsible Agency under CEQA Guidelines section 15381, the Department has authority over activities in streams and/or lakes that will divert or obstruct

the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency, the Department may consider the Negative Declaration or Environmental Impact Report of the local jurisdiction (Lead Agency) for the project. To minimize additional requirements by the Department pursuant to section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.<sup>1</sup>

- a) In Project areas which may support ephemeral streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of ephemeral channels and help maintain natural sedimentation processes; therefore, the Department recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral drainages.
  - b) Project-related changes in drainage patterns, runoff, and sedimentation should be included and evaluated in the environmental document.
- 4) Weed Control. The Project site contains mainly weedy, non-native species. The Department recommends planting the upland (excluding roads) and non-inundated areas of the Project with native, drought tolerant species to help reduce the number of weeds on the Project site. Areas left without vegetation are hotspots for weeds to become established and contribute weed propagules to the downstream watershed.

We appreciate the opportunity to comment on the referenced MND. Questions regarding this letter and further coordination on these issues should be directed to Kelly Schmoker at (949) 581-1015 or [Kelly.Schmoker@wildlife.ca.gov](mailto:Kelly.Schmoker@wildlife.ca.gov).

Sincerely,



Betty J. Courtney  
Environmental Program Manager I  
South Coast Region

cc: Erinn Wilson, CDFW, Los Alamitos  
Brock Warmuth, CDFW, Ventura  
Scott Harris, CDFW, Ventura  
Matt Chirdon, CDFW, Ojai  
Scott Morgan, State Clearinghouse

---

<sup>1</sup> A notification package for a LSA may be obtained by accessing the Department's web site at [www.wildlife.ca.gov/habcon/1600](http://www.wildlife.ca.gov/habcon/1600).

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 897-9140

FAX (213) 897-1337

www.dot.ca.gov

clear  
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February 11, 2016

Governor's Office of Planning &amp; Research

FEB 16 2016

**STATE CLEARINGHOUSE**

Mr. John Bodenchak  
County of Los Angeles  
Department of Public Works  
Water Resources Division  
900 South Fremont Avenue  
Alhambra, CA 91803

Re: Pacoima Spreading Grounds  
Improvement Project  
Vic: LA-5/PM 154.939  
IGR#160122ME -MND

Dear Mr. Bodenchak:

The California Department of Transportation (Caltrans) has reviewed the Mitigated Negative Declaration (MND) prepared for the proposed Pacoima Spreading Ground Improvement Project. The Project would involve improvements to the existing facilities to increase the water holding capacity from 530 acre-feet to 1,197. The improvements would include replacing the intake canal with underground pipelines; deepening and combining the basins to remove the underlying clay layer; and constructing new interbasin structures and an overflow structure/outlet weir.

The nearest State facility to the proposed project is Interstate-5. Caltrans does not expect project approval to result into a direct adverse impact to the existing State transportation facilities.

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

As a reminder, any transporting of heavy construction equipment and/or materials which require the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods.

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



Mr. Bodenchak  
February 11, 2016  
Page 2

If you have any questions regarding these comments, please contact project coordinator Miya Edmonson, at (213) 897-6536 and refer to IGR/CEQA No 160122ME.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dianna Watson".

DIANNA WATSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

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



**State of California – State Clearinghouse and Planning Unit**

**February 26, 2016**

SCH-1      This comment is acknowledged. The Office of Planning and Research (OPR) is indicating that the LACFCD has complied with the State Clearinghouse's CEQA public review requirements.



State of California – Natural Resources Agency  
**DEPARTMENT OF FISH AND WILDLIFE**  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
www.wildlife.ca.gov

**EDMUND G. BROWN JR., Governor**  
**CHARLTON H. BONHAM, Director**



February 17, 2016

Mr. John Bodenchak  
Los Angeles County Dept. of Public Works  
Water Resources Division, 2<sup>nd</sup> Floor  
900 S. Fremont Ave.  
Alhambra, CA 91803  
spreadinggrounds@dpw.lacounty.gov

**Subject: Comments on the Los Angeles County Department of Public Works' Mitigated Negative Declaration for the Pacoima Spreading Grounds Improvement Project, City of Los Angeles, Los Angeles County (SCH #2015101063)**

CDFW1

Dear Mr. Bodenchak:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Mitigated Negative Declaration (MND) for the Pacoima Spreading Grounds Improvement Project. The lead agency is the Los Angeles County Department of Public Works (LACDPW).

The 169-acre Project site is located within the City of Los Angeles in the north-central portion of the San Fernando Valley at the intersection of Paxton Street and Arleta Avenue. The site currently diverts water from Pacoima Wash into a surface water storage facility including 10 spreading basins and 2 desilting basins for a capacity of 530 acre-feet and a percolation rate of 65 cubic feet per second. The proposed Project would deepen and reconfigure the basins increasing the surface water storage capacity to 1,197 acre-feet and an increased percolation rate of 142 cubic feet per second. The Project would also eliminate the earthen bottom intake canal that moves water from Pacoima Wash to the basins, and replace it with four 54-inch diameter reinforced concrete pipes.

The following comments and recommendations have been prepared pursuant to the Department's authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*, and pursuant to our authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) to assist the Lead Agency in avoiding or minimizing potential project impacts on biological resources.

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### Specific Comments

- 1) Hydrology. The MND should include a discussion on how this project will reduce surface flows downstream of the Project. The Department is concerned reduced surface flows could negatively affect downstream biological resources. Specifically, the Department is concerned with the biological resources within the existing Glendale Narrows section of the Los Angeles River, as well as on-going and future restoration projects under the United States Army Corps of Engineers' approved Los Angeles River Ecosystem Restoration Plan. To enable the Department to comment on the Project's potential affects to biological resources, the following information should be included in the final MND:

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- Historical data for average monthly flows for Pacoima Wash both above and below the spreading basin diversion point, if possible broken down by source (natural flow, imported water).
  - A discussion of how the proposed Project will change the historical average monthly flows below the spreading grounds, including calculating the percentage of flow reduction anticipated from this Project. 1 cont.
  - A discussion regarding timing and duration of current diversions from Pacoima Wash into the basins and any minimum flow requirements for Pacoima Wash.
- 
- 2) Cumulative Impacts: Increased diversion of water from Pacoima Wash may have considerable cumulative impacts on its tributary the Los Angeles River, as defined in CEQA Guidelines § 15065(a)(3) and § 15064(h)(1). The Department recommends the MND analyze all diversion points downstream of the proposed Project and determine how much water is being removed from the channel system and evaluate the significance of the Project's cumulative impacts to biological resources in the area and on the health and function of the downstream tributaries. 2
- 
- 3) Ground-nesting Birds. The Project site contains suitable habitat for ground nesting birds including, killdeer (*Charadrius vociferous*), and the MND's biological report indicated an active killdeer nest was found on-site in March 2013.
- The Department recommends the MND require that clearing of vegetation and construction occur outside of the peak avian breeding season, which generally runs from February 1st through September 1st. If project construction is necessary during the bird breeding season, a qualified biologist with experience in conducting bird breeding surveys should conduct weekly bird surveys for ground-nesting birds within three days prior to the work in the area, and ensure that no ground-nesting birds in the project area would be impacted by the project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer should be a minimum width of 300 feet, be delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors. 3
- The Department recommends LACDPW develop a Killdeer Detection and Avoidance Plan for daily operation after construction monitoring is no longer needed. The Department recommends educating LACDPW staff to look out for ground nesting birds on dirt roads and earthen berms, how to properly avoid impacts to nests using appropriate buffers and fencing for protection.
- 
- Lake and Streambed Alteration Agreements (LSAA).  
The Project site contains features and activities, including the replacement of the water diversion point and the undergrounding of the diversion channel that fall under Department LSA jurisdiction. As a Responsible Agency under CEQA Guidelines section 15381, the Department has authority over activities in streams and/or lakes that will divert or obstruct 4
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the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency, the Department may consider the Negative Declaration or Environmental Impact Report of the local jurisdiction (Lead Agency) for the project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.<sup>1</sup>

4 cont.

- a) In Project areas which may support ephemeral streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of ephemeral channels and help maintain natural sedimentation processes; therefore, the Department recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral drainages.
- b) Project-related changes in drainage patterns, runoff, and sedimentation should be included and evaluated in the environmental document.

- 
- 4) Weed Control. The Project site contains mainly weedy, non-native species. The Department recommends planting the upland (excluding roads) and non-inundated areas of the Project with native, drought tolerant species to help reduce the number of weeds on the Project site. Areas left without vegetation are hotspots for weeds to become established and contribute weed propagules to the downstream watershed.

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We appreciate the opportunity to comment on the referenced MND. Questions regarding this letter and further coordination on these issues should be directed to Kelly Schmoker at (949) 581-1015 or [Kelly.Schmoker@wildlife.ca.gov](mailto:Kelly.Schmoker@wildlife.ca.gov).

Sincerely,



Betty J. Courtney  
Environmental Program Manager I  
South Coast Region

cc: Erinn Wilson, CDFW, Los Alamitos  
Brock Warmuth, CDFW, Ventura  
Scott Harris, CDFW, Ventura  
Matt Chirdon, CDFW, Ojai  
Scott Morgan, State Clearinghouse

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<sup>1</sup> A notification package for a LSA may be obtained by accessing the Department's web site at [www.wildlife.ca.gov/habcon/1600](http://www.wildlife.ca.gov/habcon/1600).

**State of California, Department of Fish and Wildlife (CDFW1)**

**February 17, 2016**

CDFW1-1      Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. Implementation of the Project is not expected to result in a change to surface flows downstream of the site that would negatively affect biological resources downstream to any measurable degree, including the Glendale Narrows section of the Los Angeles (LA) River or potential future restoration projects in the LA River approved by the LA River Ecosystem Restoration Plan.

The channels below the Pacoima Spreading Grounds are concrete-lined with the exception of a small reach of the Los Angeles River near its confluence with the Pacific Ocean. As such, there are minimal native habitat resources and ecological function present in these channels.

The Project would not result in a change to surface flows that could negatively affect biological resources downstream of the site. For example, it is recognized that the Glendale Narrows section of the Los Angeles River has vegetation that has persisted without active management by the U.S. Army Corps of Engineers. However, the increased diversion into the Pacoima Spreading Grounds resulting from the Project, of up to 10,500 acre-feet per year (in a wet year), would not adversely affect the biological resources of the Glendale Narrows section for the following reasons.

First and most importantly, the Pacoima Spreading Grounds would be operated such that flows will be diverted into the Spreading Grounds only during high flow conditions (i.e. intense storm events). Some vegetation types and/or wildlife species are dependent on the effects of flood flows occurring on the upper banks, or floodplain, of a waterway (e.g., scouring, sediment transport, seed transport, seed scarification). Although the “banks” of the Glendale Narrows section are less steep than the vertical channel walls present upstream, the levy slopes are composed of concrete. As such, there is no potential for terracing (i.e., level benches arrayed in steps) as would be present in a natural system. Terraces on the banks of a natural stream system are where flood-dependent biological processes occur. Therefore, the Glendale Narrows section is not a flood-dependent habitat area because of topography of the banks (i.e., no terracing). Accordingly, any reduction of flows passing through the Glendale Narrows, as long as low flows continue, would not adversely affect the riparian woodland habitat in this reach. Since the Project would only divert flows during high flow conditions, the Project would not change the volume or frequency of low flows.

In addition, the further the distance between a reduced flow regime created by a diversion and the downstream vegetation that may be supported by that flow, the less effect the change in flows would typically have on that vegetation. This is because the amount of downstream flow reduction, resulting from the diversion, represents a smaller and smaller percentage of the total downstream flow reaching the vegetation as additional flows enter the drainage system downstream of the diversion. Regarding the Project in particular, there are innumerable additional inflows to the channel and the Los Angeles River over the approximately 15 linear miles between the diversion point and the Glendale Narrows section of the Los

Angeles River. At this substantive distance, there would be no detectable reduction or other change in surface flows.

Further, the watershed upstream of the diversion point represents only approximately 11 percent of the total watershed draining to the Glendale Narrows area with most being pervious as opposed to the mostly impervious balance of the contributing watershed (see Exhibit CDFW1-1). The impervious surfaces of the downstream portions of the watershed below the diversion would be expected to contribute in greater proportion to the flows in the channel and LA River.

For the foregoing reasons, the Project's impact on biological resources downstream, including the Glendale Narrows section of the Los Angeles River or potential future restoration projects in the LA River approved by the LA River Ecosystem Restoration Plan, is expected to be negligible and additional hydraulic data is considered unnecessary for the determination of impact significance.

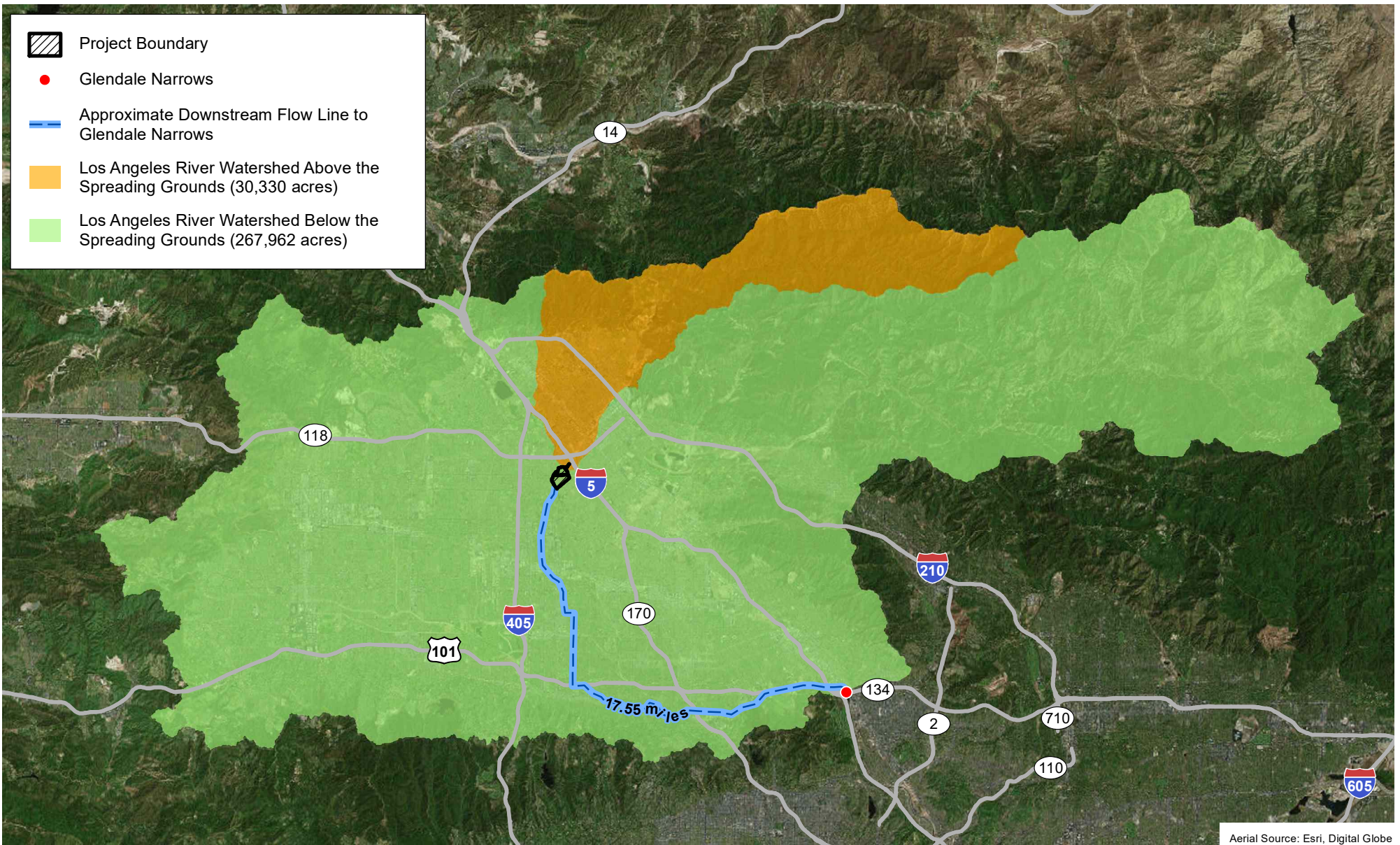
CDFW1-2 As discussed in Response CDFW1-1, above, the Project would not result in a change to surface flows downstream of the site that could negatively affect biological resources in the Glendale Narrows section of the Los Angeles River. In light of the discussion above, implementation of the Project would not have a cumulatively considerable impact on biological resources in the downstream section of the Los Angeles River.

CDFW1-3 As discussed on page 11 of the Biological Technical Report of the 2016 MND (Appendix B), "One active killdeer nest was observed just outside the southeast corner of the boundary of the western portion of the Project site (located on the west side of Arleta Ave.)." As noted on page 3-23 of the 2016 MND, impacts to nesting birds, both on and adjacent to the Project site, would be considered a significant impact prior to mitigation. Consistent with the Migratory Bird Treaty Act, which includes the killdeer, mitigation measure (MM) BIO-1 requires a pre-construction survey and describes the process for protecting any active nests. The observation of a single nest of a non-sensitive bird species adjacent to the site in 2013 is not considered an essential nexus, as defined in Section 15126.4(a)(4)(A) of the State CEQA Guidelines, for additional mitigation for this species above and beyond MM BIO-1. Also, the recommended additional mitigation is not roughly proportional, as defined in Section 15126.4(a)(4)(B) of the State CEQA Guidelines, to the impact to nesting bird and raptors with implementation of MM BIO-1. In addition, Public Works' Stormwater Maintenance Division has instituted a Nesting Bird Awareness Program for its field staff in which they are trained on how to identify nesting bird activity and implement appropriate steps to further reduce impacts on nesting birds.

CDFW1-4 The Project includes no substantial work within Pacoima Wash that would change the bed, channel, or bank. Therefore, no Lake and Streambed Alteration Agreement (LSAA) is needed. Furthermore, as discussed in Response CDFW1-1, above, upon completion of construction activities, the facility would only be operated during high flow conditions and would not divert dry weather flows from the downstream channels. Therefore, it would have no impact on base flows for downstream riparian resources as described further in Response CDFW1-1, above. Lastly, the Project will not alter the existing intake capacity (i.e., a maximum of 600 cubic feet per second [cfs]). During typical high flow conditions, when diversions are intended to occur, the peak flow in the channel would exceed the



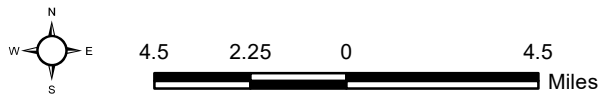
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## LA River Watershed from Glendale Narrows

Exhibit CDFW-1

Pacoima Spreading Grounds MND



600 cfs and all excess flows would continue downstream, as in the existing condition.

CDFW1-5      As the Project would result in no impacts to sensitive vegetation types or plant species and no unmitigated significant impacts to wildlife species, there is no requirement to implement the recommended mitigation pursuant to Section 15126(a)(3) of the State CEQA Guidelines.



**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 897-9140

FAX (213) 897-1337

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*Serious drought.  
Help save water!*

February 11, 2016

Mr. John Bodenchak  
County of Los Angeles  
Department of Public Works  
Water Resources Division  
900 South Fremont Avenue  
Alhambra, CA 91803

Re: Pacoima Spreading Grounds  
Improvement Project  
Vic: LA-5/PM 154.939  
IGR#160122ME -MND

Dear Mr. Bodenchak:

**DOT1**

The California Department of Transportation (Caltrans) has reviewed the Mitigated Negative Declaration (MND) prepared for the proposed Pacoima Spreading Ground Improvement Project. The Project would involve improvements to the existing facilities to increase the water holding capacity from 530 acre-feet to 1,197. The improvements would include replacing the intake canal with underground pipelines; deepening and combining the basins to remove the underlying clay layer; and constructing new interbasin structures and an overflow structure/outlet weir.

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The nearest State facility to the proposed project is Interstate-5. Caltrans does not expect project approval to result into a direct adverse impact to the existing State transportation facilities.

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

2

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As a reminder, any transporting of heavy construction equipment and/or materials which require the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods.

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3

**State of California Department of Transportation (DOT1)**

**February 11, 2016**

- DOT1-1      Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged.
- DOT1-2      The water diverted into the facility is infiltrated, and not discharged. There would be no discharge of water onto a State highway.
- DOT1-3      The LACFCD would acquire all necessary permits to implement the Project, including a Caltrans transportation permit, if applicable. Based on the volume of soil to be exported, it is not feasible to avoid the peak commute periods for this activity. However, soil transport activities would not use oversize trucks.



**NURY MARTINEZ**  
COUNCILWOMAN, SIXTH DISTRICT

February 25, 2016

Mr. John Bodenchak  
County of Los Angeles  
Department of Public Works  
Water Resources Division  
900 South Fremont Avenue  
Alhambra, CA 91803

Dear Mr. Bodenchak,

**Martinez**

Please consider this letter as a formal response to the Mitigated Negative Declaration that relates to the Pacoima Spreading Grounds project. We understand that the project will involve several improvements to the existing facilities and to the areas around the spreading grounds.

It has been brought to my attention that residents in my district, which include the communities of Arleta and Sun Valley, are concerned about the potential for negative impacts on the surrounding neighborhoods. The project will be traveling through or near many areas with sensitive receptors, including parks, schools, homes and hospitals.

I am writing to ask that the following concerns be addressed when reviewing this project:

- |  |   |
|--|---|
| 1. Adjust and reduce the hours of operation to mitigate the impact the daily duration of activities will have on the immediate residential areas, both near the spreading grounds and near the sediment pits.  | 1 |
| 2. Provide the community, including but not limited to neighbors and the Arleta and Sun Valley Area Neighborhood Councils, with a plan that will show how dust will be mitigated for the communities abutting the Pacoima Spreading Grounds, along the haul routes, and near the sediment pits.  | 2 |
| 3. Change the proposed haul routes to prevent as much as possible, any travel along segments of streets that have sensitive receptors such as homes, schools, parks, and hospitals. Changes to the haul routes should include, but not be limited to, modifying the proposed routes so that trucks traveling south on Interstate 5 Freeway will instead exit further South on Tuxford Street, rather than exiting Sheldon Street, and then travel back to the appropriate sediment pit. While longer in mileage, this route does not present any sensitive receptors. The added fuel cost is well worth the savings on human health and quality of life. | 3 |

CD6.LAcity.org

City Hall Office • 200 N. Spring Street, Suite 470, Los Angeles, CA 90012 • (213) 473-7006 • Fax: (213) 473-7779

Van Nuys Office • 14410 Sylvan Street, Suite 215, Van Nuys, CA 91401 • (818) 778-4999 • Fax: (818) 778-4998

Sun Valley Office • 9300 Laurel Canyon Blvd., 2nd Floor, Sun Valley, CA 91331 • (818) 771-0236 • Fax: (818) 767-7821



- 
- |   |   |
|---|---|
| 4. Add street lighting, along Filmore Street, between Woodman Avenue and the Pacoima Wash to mitigate any potential trespassing and dumping in or adjacent to the spreading grounds, as is often experienced at long term construction sites. | 4 |
| 5. Provide the community, including but not limited to neighbors and the Arleta Neighborhood Council, with a plan that addresses how construction/digging noise will be mitigated at the spreading grounds during the project.                | 5 |
| 6. Provide the community, including but not limited to neighbors and the Sun Valley Area Neighborhood Council, with a plan that addresses how delivery and unloading of sediment will be mitigated at the sediment pits during the project.   | 6 |
- 

While this project will surely be beneficial to the water needs of the region, I ask that you address these concerns, and those raised by local residents, and strengthen and clarify the proposed mitigation measures. If you have any questions regarding my comments, please do not hesitate to contact Ackley Padilla of my staff at 213.473.7006.	7
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Sincerely,

  
NURY MARTINEZ  
Councilwoman, Sixth District

NM:ap:aa:ej

**City of Los Angeles, Nury Martinez, Councilwoman, Sixth District (Martinez)**

**February 25, 2016**

Martinez-1 Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. Based on public comments received on the 2016 MND, the construction schedule for the Project was adjusted from 8-hour workdays conducted within the hours of 7:00 AM to 7:00 PM on Monday–Friday and 8:00 AM to 5:00 PM on Saturday over a period of approximately 18 months, to a maximum 8-hour workday conducted within the hours of 9:00 AM to 5:30 PM, Monday–Friday, with elimination of Saturday work, over a period of approximately 20 months. With this schedule adjustment, the Monday-Friday workday schedule is condensed (i.e. starting later and ending earlier) and would not involve weekend work. However, subsequent to circulation of the Recirculated MND, and as discussed further in Section 4.0, the LACFCD has determined that the anticipated construction period will be extended from approximately 20 months up to a maximum of 36 months. This extension is primarily as a result of limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.

Regarding the schedule at the sediment pits (assumed to refer to the Vulcan-owned sediment disposal locations), as discussed in Section 2.4, Project Description, of the Recirculated MND, “the acceptance of excavated sediment from the Project site at any of the Vulcan Materials-owned pits or the Sunshine Canyon Landfill would not result in an exceedance of their permitted daily limit; each facility must operate within the restrictions set forth in their operating permits. As such, there would be no change in the environmental conditions at or around the sediment disposal locations as a result of the Project.” Also, because of the reduction in allowable daily workhours during the Monday-Friday workweek, trucks from the Project site would arrive at the sediment pits within a condensed period of time when compared to the schedule set forth in the 2016 MND.

Therefore, in light of the adjusted schedule, the identified significant impacts on residential areas near the Project site and the sediment disposal sites related to air quality, noise, and traffic would continue to be reduced to a less than significant level with mitigation.

Martinez-2 As described in regulatory requirement (RR) AQ-1 in Section 3.3, Air Quality, of the Recirculated MND, fugitive dust control would be performed consistent with the South Coast Air Quality Management District (SCAQMD) rules and permitting requirements. Specifically, the Contractor would be required to comply with the Rule 403, including additional requirements for large operations, which would include preparation of a Fugitive Dust Control Plan. However, it should be noted that per the County of Los Angeles (County) standard operating procedures, which the LACFCD implements in its projects, the Rule 403-compliant Fugitive Dust Control Plan will be prepared by the selected contractor. The contractor has not been selected at this time. The Fugitive Dust Control Plan must be submitted for review and approval by the LACFCD before Project initiation.

Based on public comments on the 2016 MND, additional detail was added to RR AQ-1 in the Recirculated MND regarding anticipated contractor requirements to manage fugitive dust on the spreading grounds and within the haul trucks under Rule 403. In addition to a Fugitive Dust Control Plan, Contractor compliance with Rule 403 requirements would include, but not be limited to:

- A Dust Control Supervisor, that possesses a current certification from SCAQMD, would be designated. The Dust Control Supervisor would be responsible for preparing the Dust Control Plan.
- Signage, meeting the standards of the Rule 403 Implementation Handbook, would be installed around the Project site prior to initiating any sediment removal activities. The signage would provide an appropriate contact person(s) and phone number(s) to call with dust-related complaints and the phone number of the SCAQMD compliance office. The signage would remain and be maintained for the length of the Project.
- Daily inspections would be conducted by the Dust Control Supervisor, and specific dust control actions would be documented on the SCAQMD Inspections from the Rule 403 Implementation Handbook.
- Watering exposed surfaces at least three times per day or more during windy conditions. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour.
- Fugitive dust would be controlled during after-hours through the implementation of Best Available Control Measures (BACM) identified in SCAQMD Rule 403 and the Fugitive Dust Control Plan. Non-toxic soil stabilizers/dust suppressants, resistant to wind erosion, that create a crust on the surface may be selected and applied consistent with Rule 403.
- Traffic speeds on unpaved roads would be restricted to no more than 15 miles per hour.
- One or more devices would be installed at ingress/egress points to remove dirt from vehicle tires and undercarriage prior to leaving the site.
- All materials to be loaded for export would be pre-watered.
- All haul trucks would be covered (with on board tarp).

Based on public comments on the Recirculated MND, the Contractor specifications for Rule 403 compliance shall state that all haul trucks will be covered with an on-board tarp. The alternate means of limiting dust generation from trucks of maintaining two feet or more of freeboard will not be an option. The text of RR AQ-1 has been edited accordingly in Section 4.0, Clarifications, of this document.

Even with compliance with Rule 403, based on the evaluation of the revised Project schedule and haul routes, a new significant impact related to local (but not regional) emissions of particulate matter with a diameter of 10 microns or less (PM<sub>10</sub>) – a class of fugitive dust – was identified. Therefore, the Recirculated MND includes two new mitigation measures (MMs) to reduce criteria pollutant emissions, as presented below. MM AQ-1 requires all off-road equipment greater than 50 horsepower operated on the Project site to meet Tier 4 Final emissions standards. While this is required to reduce regional emissions of nitrous oxides (NO<sub>x</sub>) to a less than significant level, it also serves to reduce emissions of PM<sub>10</sub>.

MM AQ-2 requires that the tops of the central levees, which run in a northeast-southwest direction, are paved or surfaced with a Roadway Mat System that is no less effective than a paved road at controlling fugitive dust emissions. The pavement and/or mat system must be installed prior to the start of hauling activities. With implementation of MMs AQ-1 and AQ-2, dispersion modeling results included in the Recirculated MND show that local emissions of PM10 would be reduced to below the SCAQMD threshold, and therefore would be less than significant with mitigation.

**MM AQ-1** The Los Angeles County Flood Control District (LACFCD) shall include in the Contractor specifications the requirement that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 Final emissions standards. To provide evidence that the equipment is the appropriate tier, it shall be registered with the California Air Resources Board and have a label detailing that the equipment meets Tier 4 emissions standards. This requirement shall be monitored by LACFCD's on-site Construction Inspector, when inspecting the site.

**MM AQ-2** Prior to the start of haul truck operations, the Los Angeles County Flood Control District (LACFCD) shall include in the Contractor specifications the requirement that the top of the central levee spanning the spreading grounds in a northeast-southwest direction be paved or a Roadway Mat System that is no less effective than a paved road at controlling fugitive dust emissions, be installed. In order to eliminate an adequate amount of unpaved surface to reduce dust emissions to a less than significant level, the paving or Roadway Mat System shall be of sufficient length to cover the greater of either: (1) a minimum of 25 percent of the total off-road path length being utilized by the haul trucks within the spreading grounds; or (2) a minimum of 660 linear feet of the paving or Roadway Mat System. The paving or Roadway Mat System shall be routinely inspected and maintained by the Contractor as often as needed to ensure the integrity of the surface and eliminate fugitive dust emissions from the off-road segments with this treatment. The haul truck drivers shall be directed to drive on the paving or Roadway Mat System exclusively unless there is no feasible alternative. The condition and use of the paved/matted levee roads shall be monitored by LACFCD's on-site Construction Inspector when inspecting the site.

Finally, based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM10; the requirements for this monitoring will be included in the Contractor specifications.

Martinez-3 As discussed in Section 1.1, Project History and California Environmental Quality Act Process, of the Recirculated MND, "Subsequent to the public review period, and at the same time the comments received were being reviewed and considered, the LACFCD learned that the Vulcan-owned sediment disposal sites would no longer be able to accept the total volume of excavated soil from the Project site. Therefore, revisions to the sediment disposal locations, and the haul routes were made. Additionally, revisions to the daily and weekly schedule, and the haul



routes—beyond the changes necessary to accommodate the new disposal locations—were made based on public comments received on the 2016 MND.”

Specifically, Haul Route A, presented in the 2016 MND, was modified to reflect community input (i.e., 2016 MND comment letter from Pacoima Beautiful dated February 25, 2016). This is presented as Modified Haul Route A in the Recirculated MND. It is noted that the route requested in the letter described the following as part of the return route from the Cal-Mat location: “...and proceed to the 118 FWY and take the south bound 5 FWY to Arleta and Devonshire exit they arrive back at the Spreading Grounds and will avoid almost all the resident's domiciles.” However, the traffic consultant determined there are no southbound exits that would represent an “Arleta and Devonshire exit”. Also, traveling from westbound State Route 118 (SR-118) freeway to southbound Interstate 5 (I-5) freeway (as suggested), the first opportunity to exit from southbound I-5 Freeway south of SR-118 is at Osborne Street. Further, using the Osborne Street exit, in addition to having to back-track quite far to turn to the Spreading Grounds, there are residential homes located along both sides of Arleta Avenue. As such, the Modified Haul Route A return route uses Osborne street to provide both the shortest distance and avoid a primarily residential street. The planned haul routes do not include any side residential streets, defined as those streets almost exclusively serving traffic to and from individual residences. A complete description of Modified Haul Route A is provided below.

As discussed in Section 2.4, Project Description, of the Recirculated MND, Modified Haul Route A would involve loaded trucks traveling eastbound on Devonshire Street (from the east side of the spreading grounds) and turning immediately north on Arleta Avenue, northeast on Paxton Street to access I-5 Southbound, and either (1) taking the Sheldon Street exit heading northwest on Laurel Canyon Boulevard and northeast on Branford Street to access the Boulevard Pit or (2) taking the Penrose Street exit then heading southwest on Penrose Street, northwest on San Fernando Road, northeast on Tuxford Street, northwest on Glenoaks Boulevard to access the Cal-Mat Pit, or continuing further on Glenoaks Boulevard and making a right turn on Sheldon Street to access the Sheldon Pit.

Empty trucks would either travel northeast on Branford Street from the Boulevard Pit then northwest on Glenoaks Boulevard, travel northwest on Glenoaks Boulevard from the Cal-Mat Pit, or travel southwest on Sheldon Street from the Sheldon Pit then northwest on Glenoaks Boulevard, northeast on Osborne Street and Foothill Boulevard to access I-210 Westbound, merging onto SR-118 Westbound, taking the San Fernando Road exit, making a right turn on Paxton Street heading southwest, southbound on Arleta Avenue and then on Devonshire Street into the spreading grounds. Based on the above description of the Modified Haul Route A, potential impacts to sensitive receptors would remain less than significant.

Martinez-4      The potential for temporary conditions on the site related to Project implementation to provide increased opportunities for theft or vandalism is discussed in Section 3.14, Public Services, of the Recirculated MND. As in the existing condition, both the spreading grounds and the headworks would be fully secured with fencing and locked gates, and the gates would only remain open during construction activities. Also, the Contractor would be required to secure building materials and construction equipment to prevent theft and vandalism from



occurring at the Project site during construction activities as a part of standard operating procedures. Additionally, no unusually valuable or out of the ordinary construction-related equipment or materials would be associated with Project implementation that would generate attraction for theft. Construction of the Project would result in more daily activity on the site when compared to ordinary operations of the Pacoima Spreading Grounds, where the site is generally unstaffed. For these reasons, the Recirculated MND concludes that construction of the Project would not be expected to lead to increased trespassing or dumping, as these are not existing issues.

Based on review of aerial photography, it appears that there are nine to ten street lights installed along Filmore Street between Woodman Avenue and Pacoima Wash. Also, as the east side of Filmore Street, across from the spreading grounds, is developed primarily with single-family homes, installing additional street lights would increase the level of nighttime lighting for the residents in the area. The Recirculated MND concludes there would be no increase in nighttime light and glare that would affect the surrounding uses. As discussed above, there is no evidence that the Project would result in an impact related to on-site theft or vandalism, that would require additional street lighting to prevent such activities.

Martinez-5

As discussed in Section 3.12, Noise, of the Recirculated MND, based on the evaluation of the revised Project schedule and haul routes, a significant noise impact would occur during demolition activities at the headworks. This impact, and the associated mitigation (MM NOI-1), is the same as in the 2016 MND. MM NOI-1, provided below, requires a sound wall to be installed along the shared property line with the affected residences near the headworks. With implementation of MM NOI-1, noise modeling results show that the maximum noise level at the headworks would be reduced to below the applicable threshold, and therefore be less than significant with mitigation.

**MM NOI-1**

The Los Angeles County Flood Control District shall construct, or have constructed as part of the Contractor specifications, an 8-foot-high temporary sound wall along the shared property line with the nearby homes located northwest of the headworks improvements area. The sound wall shall extend at least 100 feet past the extent of the intake channel demolition activities (i.e., deconstruction of the concrete channel and other existing infrastructure) and shall be constructed of minimum ½-inch plywood or Oriented Strand Board (OSB). The sound wall shall be installed prior to the start of demolition activities and shall remain until the completion of the headworks improvements.

Regarding noise generation within the spreading grounds, as shown in Table 3-16 of the Recirculated MND, the estimated maximum construction noise levels at the three identified sensitive receptors (i.e., Devonwood Park, the nearest home and church adjacent to the spreading grounds, and the nearest home to the headwork) would be below the applicable noise threshold. However, based on public feedback, the LACFCD has opted to also install the sound wall along the private-facing perimeter (i.e., where the spreading basins abut private land uses). The sound wall would be at least eight feet high and would be installed prior to construction activities.

As discussed in Section 3.12, the noise model incorporates several additional conservative assumptions, including (1) hard terrain on the site, whereas the site is primarily comprised of soft terrain (i.e., dirt), which provides relatively lower noise levels; (2) direct line-of-sight between the noise source and receptor (i.e., no barriers); and (3) stationary operation of each piece of equipment for a period of one hour, with the nearest equipment being a dozer. In reality, the on-site construction activity is not expected to be stationary for an hour. Also, the majority of the spreading basin excavation and channel replacement would occur at a further distance than the nearest point on the site and be below the grade of the surrounding receptors (e.g., at a lower level), thereby providing noise reduction when compared to the noise modeling results. Therefore, the conservative analysis of construction noise at the spreading grounds did not result in the need for additional mitigation measures for noise.

Although a significant noise impact within the spreading grounds was not identified in the Recirculated MND and no mitigation is required, the LACFCD will include the following requirements in the Contractor specifications, beyond what is required:

- A Noise Assessment and Mitigation Manager (NAMM), who is an acoustical engineer and a member of the Institute of Noise Control Engineering and/or Acoustical Society of America, would be designated and responsible for conducting preparing and implementing a Noise Assessment Report and Noise Management Plan. The document must meet the following requirements, including, but not limited to:
  - Be reviewed and approved by the LACFCD prior to equipment mobilization to the site;
  - Include a three-dimensional construction noise model and preparation of Noise Contour Maps illustrating the noise contours for the principal noise sources (such as headworks demolition activities; contractor staging areas; and excavation, grading, and loading areas) and all residential and commercial buildings within the affected areas;
  - Predict the noise levels at the closest residential and commercial buildings at the real-property line to the noise sources based on the equipment in operation, and compare to the maximum noise levels (1-hour 90 decibels [dBA]  $L_{eq}$  and 8-hour 80 dBA  $L_{eq}$ );
  - In addition to MM NOI-1, include measures and best practices that reduce construction noise, as feasible, to ensure compliance with all applicable federal, State, and local regulations.

Martinez-6

As discussed in Section 2.4, Project Description, of the Recirculated MND, “the acceptance of excavated sediment from the Project site at any of the Vulcan Materials-owned pits or the Sunshine Canyon Landfill would not result in an exceedance of their permitted daily limit; each facility must operate within the restrictions set forth in their operating permits. As such, there would be no change in the environmental conditions at or around the sediment disposal locations as a result of the Project.” Because delivery and unloading of sediment from the Pacoima Spreading Grounds at the disposal locations would be within the

parameters of the approved operating permit for each facility, there would be no impact and no mitigation is required.

Martinez-7 All comments received on the 2016 MND will be considered by the LACFCD and the County of Los Angeles Board of Supervisors, via this complete Responses to Comments document that has been prepared subsequent to public review of the Recirculated MND. Mitigation is required for all significant environmental impacts of the Project as identified in the Recirculated MND for the Project. As such, no additional mitigation, beyond what is proposed and included in the 2016 MND and the Recirculated MND, is required.

## **2.2    ORGANIZATIONS**

- Pacoima Beautiful, February 25, 2016.
- Sun Valley Area Neighborhood Council, February 24, 2016.



February 25, 2016

John Bodenchak  
Los Angeles County Flood Control District  
900 South Fremont Avenue  
Alhambra, California 91803-1331

**Re: Initial Study/Mitigated Negative Declaration for the Pacoima Spreading Grounds Improvement Project**

Dear Mr. Bodenchak,

**PB**

This letter is in response to the Initial Study/Mitigated Negative Declaration for the Pacoima Spreading Grounds Improvement Project (PSGIP). Pacoima Beautiful has been an advocate for improving the quality of life for residents of the Northeast San Fernando Valley since 1996. The health of people living in the neighborhoods of Pacoima and Sun Valley has long been affected by cumulative impacts that would only increase if this project is not more carefully planned. We understand the value of this project and although we are in favor of it, we would like to address a few concerns that were presented in the MND.

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Under section 3.3. **Air Quality** the question states "Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?" and the answer was "Less than Significant Impact". In October of 2015, the methane leak 9 miles away in Porter Ranch, which has been cited by the L.A. Times as "the worst natural gas leak in U.S. history" occurred and contributed to the levels of methane, benzene, mercaptans and particulate matter. Was testing for the PSGIP done prior to the leak? If so, the "Less than Significant Impact" rating may be erroneous. We ask that air quality sampling be retaken to provide the public with accurate information.

1

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Also related to air quality are the increased amounts of diesel particulate that will be present due to the 240 daily round trips that will be made in and around residential areas of Pacoima and Sun Valley. Not only will the emissions generate increased levels of diesel in our neighborhoods but the fugitive dust that will come from the soils being carried on the trucks will contribute to already elevated levels of asthma triggers and respiratory issues.

2

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In order to reduce the likely hood of sensitive receptors being exposed to these increased levels of diesel and dust we ask that you consider the alternative routes that the Sun Valley Area Neighborhood Council is proposing (letter is attached).

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The MND states that the project does not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such

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facilities. Our organization also finds this to be erroneous as the City of Los Angeles has recently adopted two very important transportation related policies; the updated Mobility Element to the General Plan and Vision Zero. The Mobility Element, which is known as the Mobility Plan aims to create safer more efficient pedestrian, transit, bike and vehicular networks. The current routes as they are proposed would not promote what this recently adopted plan proposes to do. The routes as outlined create an increased presence of large trucks that could pose a threat to the community members that use their bike and public transit as their mode of transportation. Both transit users and bike riders also walk therefore the impacts on pedestrians are also a concern. By using routes where fewer residences are present, the trucks will have less of a possibility of injuring a pedestrian, bike rider or transit user.

4 cont.

The Los Angeles Department of Transportation (LADOT) has also adopted Vision Zero. Vision Zero is a road safety policy that promotes smart behaviors and roadway design that anticipates mistakes so that collisions do not result in severe injury or death. A large section of Sheldon Avenue is included as part of LADOT's High Injury Network. We hope that with the alternative routes that have been proposed by the Sun Valley Area Neighborhood Council, the presence of trucks on the High Injury Network will be minimal.

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Lastly, this project is an important opportunity to create open space and enhance recreational opportunities in one of the most park poor areas in the entire region. The Pacoima Spreading Grounds is one of the few large pieces of open space in the entire San Fernando Valley. It is already being used as a recreational amenity via The Nature Parkway on Devonshire Street which takes advantage of the sweeping vistas created by the spreading grounds. The Spreading Grounds is also an important juncture for the Pacoima Wash Greenway which will soon link the communities of the Northeast San Fernando Valley via a multi modal path. We urge you to use the PSGIP as an opportunity to open up portions of the spreading grounds for trails and open space that can be utilized during non-storm events. Excess land not used for infiltration can be converted to new park space and wildlife habitat. The service roads along the perimeter and through the middle of the site could be turned into multi use paths for recreation and mobility. These improvements have the potential to turn the site into a regional amenity and also make it a better neighbor for the surrounding community. Renderings are attached to this letter.

5

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Thank you for taking these comments into consideration. Should you have any questions or comments please do not hesitate to contact me at [vpadilla@pacoimabeautiful.org](mailto:vpadilla@pacoimabeautiful.org) or (818) 899-2454 Ext. 100.

Sincerely,



Veronica Padilla  
Executive Director

# CITY OF LOS ANGELES

CALIFORNIA

**Sun Valley Area  
Neighborhood Council**

President

Gary Aggas

Vice President

Secretary

Elizabeth Bille

Mylo Koenig

2<sup>nd</sup> Vice President

Treasurer

Mike O'Gara

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SUN VALLEY AREA NEIGHBORHOOD COUNCIL

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Feb 15 2016

Supervisors Michael D. Antonovich and Sheila Kuehl and City Councilmembers Nury Martinez and Felipe Fuentes;

We are writing to you asking for help before a great injustice is foisted on the Community of Sun Valley

The Los Angeles County Flood Control District (LACFCD) has a project going on in Pacoima to Increase the depth of the Pacoima Spreading Grounds basins from 8 to 10 feet to 18 to 20 feet. This project is to enable the City to recover more Stormwater and allow it to percolate down into the San Fernando Valley Aquifer. These Basins are at the junction of Arleta St and Devonshire Blvd in Pacoima.

6

This is a good project BUT an EIR has been finished without any notification to the community of Sun Valley and we in Sun Valley did not think that we would be involved in this project as we were NEVER mailed anything from the County or The LADWP about this project. Now we find out that the County has filed for a Mitigated Negative Declaration in order to transport 1.37 MILLION CUBIC YARDS OF DIRT thru Sun Valley and deposit it in a number of Inert Debris landfills in Sun Valley. This will take 240 round trips of air polluting diesel trucks to travel thru Sun Valley Streets for 18 months,

That is 480 trucks traversing our streets per day times 7 days a week times 4 weeks in a month times 18 months.

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480 trucks Xs 5 days =3360 Xs 4 weeks a month =13440 Xs 18 months =241,920 trucks belching all kinds of pollution past our homes schools and hospitals and our “sensitive receptors”.

There has to be a violation here against the LACFCD for not complying with notification requirements to notify all residents businesses and other entities within a 500 foot radius of these haul routes. They did not notify the Neighborhood Council in Sun Valley –Did they notify the Arleta Neighborhood Council? They did not even have the decency to send copies of the EIR or the MND to our local libraries, in Sun Valley or Arleta.

This all was concealed from the local people in Sun Valley who are going to be impacted far more than the residents of Pacoima, Because of trucks;

- 1) congesting our streets
- 2) destroying our streets by the weight of these trucks
- 3) raining down air pollution on us from the diesel trucks.

The routes they have proposed go right past one High School -Sun Valley High School at Telfair Ave and Sheldon St. One Military Charter school located at Haddon Ave and Sheldon St and one Alliance Charter school under construction at Allegheny St and San Fernando Road. This school will open in the fall of 2017. These three schools will contain over 2500 “Sensitive Receptors” and the project anticipates driving 240 Air polluting diesel trucks ROUNDTrip past these schools. There is also a Hospital (Pacifica Hospital) located between Truesdale St and Sheldon St on San Fernando Road, and Serra Health Clinic (Five stories tall ) with hospital facilities on one floor located at Sheldon St and San Fernando Rd.

6 cont.

These haul routes need to be changed. The primary reason for the choices we are suggesting here was to avoid homes schools and Medical facilities in Sun Valley on and around Sheldon St ----avoid homes and schools across Glenoaks West of Osborne in Pacoima—avoid homes and schools on Paxton near the spreading grounds. The last two by traveling on the freeways on the return trip

The present Haul Route labeled Haul Route ‘A’ works UNTIL THEY EXIT THE 5 FWY at SHELDON—The trucks cannot be allowed to do that! Going on Sheldon St takes them past the three schools previously mentioned and a lot of single family residences and apartments that occupy both sides of Sheldon St.

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IF THE TRUCKS continue on the 5 FWY past Sheldon and exit at PENROSE St they can then make a LEFT turn onto Penrose and proceed to "OLD" San Fernando road (This street rarely has any traffic )and make a RIGHT turn and Proceed to Tuxford street Make a RIGHT turn on to Tuxford street go north on Tuxford St to Glenoaks Blvd take the left turn lane make a LEFT turn on to Glenoaks Blvd proceeding west to Sheldon St make a RIGHT turn on to Sheldon St Go One-Tenth of a mile and turn into the CAL-MAT PIT

This simple change in the route takes the trucks away from Residencies, Schools and Hospitals in Sun Valley.

The County Flood Control or LADWP or a combination of the two will have to install a Left turn traffic signal at the Penrose St off-ramp of the South bound 5 FWY to prevent traffic congestion at that place.

There are three inert landfills named as designated sites BUT no amount of debris is mentioned as to how much is going to which landfill. That cannot be allowed! we need to be told NOW what streets are going to be impacted during which hours and on what days. This is all very poorly thought out in fact we feel that very little time and effort was put into these haul routes and where the final destination is going to be. The Cal-mat pit is presently operating under a permit from Cal-Recycle and a CUP from the City of Los Angeles wherein they are allowed to take a little over three hundred truckloads of inert debris into that landfill per day. We are NOT aware of a City Permit or State permit to take in debris in either of the two other pits- Boulevard pit on San Fernando Rd or the Sheldon pit located on the west side of Sheldon St at Glenoaks Blvd. If they exist please someone furnish us with provisions of those permits.

6 cont.

Your Haul Route "B" traversing Glenoaks Blvd to and from the pits on Sheldon Ave is another poor route as it goes past lots of residences in Pacoima on Glenoaks Blvd from Osborne to Paxton and more residences on Paxton St going to and from the Spreading Grounds. It too passes schools along the way, it passes Telfair elementary on Paxton and Maclay Elementary and Middle School on Osborne between Gain and Pierce St

This is another example of little if any thought being put into the hardships this will cause to residences and "Sensitive receptors"

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### **TO return to the Spreading grounds from Cal Mat**

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Leave the Cal-Mat Pit at the normal exit on Glenoaks-- go west to Osborne on Glenoaks to Osborne and turn RIGHT ( North) on Osborne past Hansen Dam park and then Go RIGHT on to foothill Blvd where they will pass about six apartment buildings (to the right)and the go on to the 210 FWY at the Osborne St entrance and proceed to the 118 FWY and take the south bound 5 FWY to Arleta and Devonshire exit they arrive back at the Spreading Grounds and will avoid almost all the residents domiciles. Vulcan Materials will have to put up a Sound barrier wall to eliminate any increase in noise from the Cal-Mat pit. ( Also the Boulevard Pit will need sound barriers, if it is decided that needs to be used,-It is probably the closest pit to homes)

The Cal-Mat pit has a restriction on the number of trucks that can be allowed to access that pit. We are not sure how that might be worked out without creating other problems. It needs discussion and resolution. We also need to discuss running these trucks at hours not in peak traffic times and possibly at night. Especially at night during daylight savings time.

I am pretty sure Cal Mat has been used for night deliveries in the past.

6 cont.

The area of Sun Valley that you are planning to travel thru was declared an "ENVIRONMENTAL JUSTICE ZONE" Back in about 2008 by the City Council (See attached map) \*\*\*\*\*Please note that Sheldon St is in about the center of this zone and I am trying to draw my proposed haul route around the EV Justice Zone and most importantly away from residences

The Purpose of the Environmental Justice Zone is to protect minority and low-income neighbors and stakeholders by allowing assistance and advocacy to speak on behalf of communities that are traditionally underrepresented, or that have no advocates to represent them.

The areas of Arleta and Pacoima and Sun Valley have been declared an area that needs special consideration as a Clean Streets-Green Streets area by the Los Angeles City Council and needs special consideration to avoid placing environmentally unfriendly projects in these areas.

We are asking that these haul Routes be removed from consideration until the LACFCD sits with representatives from the three areas and discuss how we can

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SPREADING GROUND NATURE TRAIL SECTION



**Pacoima Beautiful (PB)**

**February 25, 2016**

- PB-1      Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. The air quality modeling of emissions resulting from a proposed Project is not based on site-specific air sampling. The South Coast Air Quality Management District (SCAQMD) defines thresholds of maximum daily emissions of criteria pollutants based on regional (South Coast Air Basin) air quality conditions on a long-term, ongoing basis and their relationship to the SCAQMD's Air Quality Management Plan, which is updated every three years. It should be noted that the primary pollutant emitted in the Porter Ranch leak, methane, nor benzene or mercaptan, are criteria pollutants tracked by the SCAQMD for purposes of CEQA evaluation of air quality impacts from construction and operation activities. In addition, there would be no methane, benzene, or mercaptan emissions associated with this Project. Particulate matter is an SCAQMD criteria pollutant, and the 2016 MND and the Recirculated MND assess particulate matter (i.e., fugitive dust, PM 10, PM 2.5) emissions during construction activities consistent with SCAQMD methodology.
- PB-2      The Air Quality, Greenhouse Gas, and Health Risk Assessment Report in the 2016 MND addresses regional and local emissions of fugitive dust (PM10 and PM 2.5) as well as emissions of diesel particulates (diesel PM) from operation of construction equipment and haul trucks. The Revised Air Quality, Greenhouse Gas, and Health Risk Assessment Report (Revised Air Quality Report) presented in the Recirculated MND also includes these analyses, which determined that the revised Project would result in a significant impact related to regional emissions of nitrogen oxides (NOx) and local (but not regional) emissions of PM10. Therefore, the Recirculated MND includes two new mitigation measures (MMs) to reduce criteria pollutant emissions. With implementation of MMs AQ-1 and AQ-2 (presented in Section 5.0 of this document), dispersion modeling results included in the Recirculated MND show that local emissions of PM10, including diesel particulate matter, would be reduced to below the SCAQMD threshold, and therefore be less than significant with mitigation.
- PB-3      The LACFCD has performed a technical evaluation of alternative haul routes based on public comments received on the 2016 MND. The Recirculated MND addressed three haul routes, including Modified Haul Route A that reflects Sun Valley Area Neighborhood Council comment letter, and new Haul Route C to Sunshine Canyon Landfill. Haul Route B would remain the same as proposed in the 2016 MND. The revisions to the haul routes, daily and weekly schedule, and disposal location involved additional traffic analysis; revised air quality, greenhouse gas, health risk assessment; and a revised noise analyses to determine the relative effects on these environmental issues compared to the haul routes addressed in the 2016 MND. The Recirculated MND determined the revised Project would result in less than significant impacts related to traffic, air quality, and noise with implementation of mitigation measures (please refer to Section 5.0, Mitigation Monitoring and Reporting Program, for a full description of all proposed mitigation measures).

- PB-4 As discussed in Response PB-3, above, alternative haul routes have been evaluated by the LACFCD. With regard to Sheldon Street, Modified Haul Route A eliminates travel on this roadway except to for the short segment between the Cal-Mat and Sheldon Vulcan facilities. While some portions of the planned haul routes have fewer residences, individuals who travel using alternative modes of transportation will potentially be on all types of roadways. The presence of haul trucks and/or movement of construction equipment on the road network is a common and unavoidable consequence of the frequent construction activity that occurs in a dense urban environment. The Project is a temporary construction activity, although for an extended period, rather than a permanent activity, and as such the increased presence of haul trucks and other construction vehicles on the Project area roadways would eventually cease and return to the existing condition. Both the City of Los Angeles' Mobility Element and Vision Zero relate to permanent development or redevelopment of land uses and the circulation system, rather than construction activity that does not result in a permanent change in land uses and related traffic patterns. As discussed on page 3-124 of the Recirculated MND, because the Project would not create a demand for alternative transportation systems and there would be no change in land uses with Project implementation, the Project would result in no impact related to adopted policies, plans, or programs related to alternative transportation systems.
- PB-5 A multi-benefit project may be considered in the future to include public recreation and additional aesthetic enhancements, based on the availability of future funding. Public Works is looking forward to working with the community on future projects near the Pacoima Spreading Grounds upon completion of the Project.
- PB-6 The responses to the Sun Valley Area Neighborhood Council letter to City and County representatives, including two parts, is presented in the following section under the abbreviation "SVANC" as Responses SVANC-2 through SVANC-14, below.

**From:** [MikeOGaraS](#)

**Sent:** Wednesday, February 24, 2016 6:46 AM

**To:** DPW-SpreadingGrounds

**Cc:**

**Subject:** Concerns About The Pacoima Spreading Grounds From Sun Valley Area NC

Mr Bodenchak;

SVANC

My name is Mike O'Gara I am the Chairperson for the Sun Valley Area Neighborhood Council and I am voicing the concerns that we have with the Pacoima Spreading Grounds. More Specifically this is a formal response to the Intial Study and Mitgated Negative Declaration (IS/MND )

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Our concerns are addressed to the Haul Routes that have been chosen to traverse the Sun Valley Community.

Please respond to this letter to let us know that you have received our Letter of Concern

It is ATTACHED.

Please put us on your list of people to be contacted regarding any further meetings or correspondence re: this project

1

Please let me know who we have to contact to make sure that we are also on any correspondence and/ or meetings of the board of Supervisors regarding this matter.

Is there any kind of File number for this project?

Thank You for your attention.

---

Sincerely

Mike O'Gara Chairperson  
Planning Committee  
Sun Valley Area  
Neighborhood Council

ATTACHMENTS:

Letter of Concern From SVANC

Exhibit: Sun Valley Map of Environmental Justice Zone



# CITY OF LOS ANGELES

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SUN VALLEY AREA NEIGHBORHOOD COUNCIL

Feb 15 2016

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4 cont.

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IF THE TRUCKS continue on the 5 FWY past Sheldon and exit at PENROSE St they can then make a LEFT turn onto Penrose and proceed to "OLD" San Fernando road (This street rarely has any traffic )and make a RIGHT turn and Proceed to Tuxford street Make a RIGHT turn on to Tuxford street go north on Tuxford St to Glenoaks Blvd take the left turn lane make a LEFT turn on to Glenoaks Blvd proceeding west to Sheldon St make a RIGHT turn on to Sheldon St Go One-Tenth of a mile and turn into the CAL-MAT PIT

7 cont.

This simple change in the route takes the trucks away from Residencies, Schools and Hospitals in Sun Valley.

The County Flood Control or LADWP or a combination of the two will have to install a Left turn traffic signal at the Penrose St off-ramp of the South bound 5 FWY to prevent traffic congestion at that place.

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There are three inert landfills named as designated sites BUT no amount of debris is mentioned as to how much is going to which landfill. That cannot be allowed! we need to be told NOW what streets are going to be impacted during which hours and on what days. This is all very poorly thought out in fact we feel that very little time and effort was put into these haul routes and where the final destination is going to be.

8

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The Cal-mat pit is presently operating under a permit from Cal-Recycle and a CUP from the City of Los Angeles wherein they are allowed to take a little over three hundred truckloads of inert debris into that landfill per day. We are NOT aware of a City Permit or State permit to take in debris in either of the two other pits- Boulevard pit on San Fernando Rd or the Sheldon pit located on the west side of Sheldon St at Glenoaks Blvd. If they exist please someone furnish us with provisions of those permits.

9

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Your Haul Route "B" traversing Glenoaks Blvd to and from the pits on Sheldon Ave is another poor route as it goes past lots of residences in Pacoima on Glenoaks Blvd from Osborne to Paxton and more residences on Paxton St going to and from the Spreading Grounds. It too passes schools along the way, it passes Telfair elementary on Paxton and Maclay Elementary and Middle School on Osborne between Gain and Pierce St

10

This is another example of little if any thought being put into the hardships this will cause to residences and "Sensitive receptors"

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### **TO return to the Spreading grounds from Cal Mat**

Leave the Cal-Mat Pit at the normal exit on Glenoaks-- go west to Osborne on Glenoaks to Osborne and turn RIGHT ( North) on Osborne past Hansen Dam park and then Go RIGHT on to foothill Blvd where they will pass about six apartment buildings (to the right)and the go on to the 210 FWY at the Osborne St entrance and proceed to the 118 FWY and take the south bound 5 FWY to Arleta and Devonshire exit they arrive back at the Spreading Grounds and will avoid almost all the residents domiciles. Vulcan Materials will have to put up a Sound barrier wall to eliminate any increase in noise from the Cal-Mat pit. ( Also the Boulevard Pit will need sound barriers, if it is decided that needs to be used,-It is probably the closest pit to homes)

10 cont.

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The Cal-Mat pit has a restriction on the number of trucks that can be allowed to access that pit. We are not sure how that might be worked out without creating other problems. It needs discussion and resolution. We also need to discuss running these trucks at hours not in peak traffic times and possibly at night. Especially at night during daylight savings time.

11

I am pretty sure Cal Mat has been used for night deliveries in the past.

---

The area of Sun Valley that you are planning to travel thru was declared an "ENVIRONMENTAL JUSTICE ZONE" Back in about 2008 by the City Council (See attached map) \*\*\*\*\*Please note that Sheldon St is in about the center of this zone and I am trying to draw my proposed haul route around the EV Justice Zone and most importantly away from residences

The Purpose of the Environmental Justice Zone is to protect minority and low-income neighbors and stakeholders by allowing assistance and advocacy to speak on behalf of communities that are traditionally underrepresented, or that have no advocates to represent them.

12

The areas of Arleta and Pacoima and Sun Valley have been declared an area that needs special consideration as a Clean Streets-Green Streets area by the Los Angeles City Council and needs special consideration to avoid placing environmentally unfriendly projects in these areas.

We are asking that these haul Routes be removed from consideration until the LACFCD sits with representatives from the three areas and discuss how we can

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get these trucks thru our neighborhoods without endangering the health of our residents.

If LAFCD brings maps with the schools and hospitals on them we can chart a haul route to a designated landfill in one meeting.

12 cont.

It MAY entail them paying for a traffic signal and routing the trucks mostly on freeways.

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The purpose of this letter to the County Supervisors and City Council Members is to initiate a dialogue to address these problems and come to a resolution that is not going to possibly cause health problems for “sensitive receptors” who live in close proximity to the proposed Haul Routes. According to the Executive

13

Summary of the Mitigated Negative Declaration, February 25 is the last day for the public to submit comments on these Haul Routes After that there will be a vote by the Board of Supervisors to approve or disapprove the proposed haul route.

14

I see no reason to rush to judgement on these Haul Routes as the project is not scheduled to start until SPRING of 2017. There is a lot of time here to discuss these routes with the affected communities. We need to start the discussions with the neighborhood councils and soon.

---

Mike O’Gara

Sun Valley Area

Neighborhood Council

Planning Chairperson

E Mail: [mikeogaraSVANC@aol.com](mailto:mikeogaraSVANC@aol.com)

Cell: 818-624-6718

CC: Jim Dantona CD-6

Ackley Padilla CD-6

Maria Chong Castillo BOS District 3

Julie Moore BOS District 4

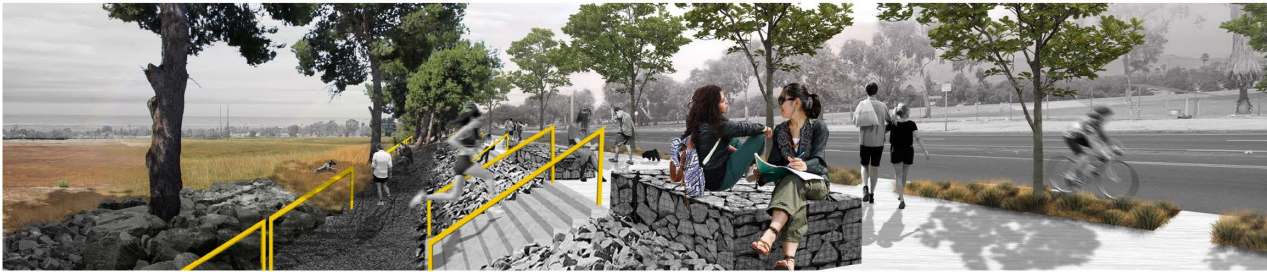
Nancy Woodruff Foothill Trails District NC

Felipe Fuente CD-7

Nury Martinez CD-6

Hilda Kuehl BOS 3<sup>rd</sup> District

Michael D. Antonovich BOS 5<sup>th</sup> District



SPREADING GROUND NATURE TRAIL



SPREADING GROUND NATURE TRAIL SECTION

# CITY OF LOS ANGELES

CALIFORNIA

**Sun Valley Area  
Neighborhood Council**

President

Gary Aggas



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Sun Valley CA 91352-0457

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Elizabeth Bille

Secretary

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2<sup>nd</sup> Vice President

Treasurer

Mike O'Gara

Sean Inkelaar-Cruz

SUN VALLEY AREA NEIGHBORHOOD COUNCIL

Feb 23, 2016

John Bodenchak  
County of Los Angeles  
Department of Public Works  
Water Resources Division  
900 South Fremont Avenue  
Alhambra, Ca 91803

RE: Pacoima Spreading Grounds Improvement Project  
Location: Intersection of Paxton St and Arleta Ave  
Communities of Arleta and Mission Hills and Pacoima

Mr. Bodenchak,

This letter is being written to you on behalf of the residents of Sun Valley who will be severely impacted by this project. We believe this is a necessary project and for the betterment of Los Angeles City and County. This Mitigated Negative Declaration proposes that you will run 240 round trips of air polluting diesel trucks thru Sun Valley Streets for 18 months, that is 480 trucks (to and from) traversing our streets per day, times 5 days a week times 4 weeks in a month times 18 months.

15

480 trucks X's 5 days =2400 X's 4 weeks a month =9600 X's 18 months =172,800 trucks belching all kinds of pollution past our homes schools and hospitals and our "sensitive receptors".



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This is a pretty big surprise as you never saw fit to notify Sun Valley that we would be affected by this project as you planned to off load 1.37 million cubic yards of dirt in our community.

There has to be a violation here against the LACFCD for not complying with notification requirements to notify all residents businesses and other entities within a 500 foot radius of these haul routes. LACFCD did not even have the decency to notify the Neighborhood Council in Sun Valley: Did they notify the Arleta Neighborhood Council? They did not even have the decency to send copies of the EIR or the IS/MND to our local libraries, in Sun Valley or Arleta.

16

This all was concealed from the local people in Sun Valley who are going to be impacted far more than the residents of Pacoima because of these trucks;

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1) Congesting our streets **Sheldon Street is a Street of Residential single family homes and apartments from the off ramps of the 5 FWY to San Fernando Rd. The trucks will be passing three schools on Sheldon St and there is a hospital and medical facility On San Fernando Road**

17

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2) Destroying our streets by the weight of these trucks

18

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3) Raining down air pollution on us from the diesel trucks.

19

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The routes that have been proposed go right past Sun Valley High School at Telfair Ave and Sheldon St. The Military Charter School located at Haddon Ave and Sheldon St as well as Alliance Charter School under construction at Allegheny St and San Fernando Road. This is three High Schools! Note that the Alliance school will open in the fall of 2017. These three schools will contain over 2500 "Sensitive Receptors" and the project anticipates driving 240 Air polluting diesel trucks ROUNDTrip right past these schools.

20

This route also includes a Hospital (Pacifica Hospital) located between Truesdale St and Sheldon St on San Fernando Road and Serra Health Clinic (Five stories tall ) with hospital facilities on one floor located at Sheldon St and San Fernando Rd.

These Haul Routes need to be changed. It seems there has been little time spent on any discussion of the routes, and the way to direct them to avoid residences and "Sensitive Receptors"

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The primary reason for the choices we are suggesting here was to avoid homes schools and Medical facilities in Sun Valley on and around Sheldon St ----avoid homes and schools across Glenoaks West of Osborne in Pacoima—avoid homes and schools on Paxton near the spreading grounds. The last two by traveling on the freeways on the return trip

The present Haul Route labeled Haul Route ‘A” works UNTIL THEY EXIT THE 5 FWY at SHELDON—The cannot be allowed to do that--- Going on Sheldon St takes them past the three schools previously mentioned and a lot of single family residences and apartments that occupy both sides of Sheldon St.

IF THE TRUCKS continue on the 5 FWY past Sheldon and exit at PENROSE St they can then make a LEFT turn onto Penrose and proceed to “OLD” San Fernando Road and make a RIGHT turn ( there is rarely any traffic on this section of San Fernando Rd) and Proceed one block to Tuxford street Make a RIGHT turn on to Tuxford street go north on Tuxford St to Glenoaks Blvd take the left turn lane make a LEFT turn on to Glenoaks Blvd proceeding west to Sheldon St make a RIGHT turn on to Sheldon St Go One-Tenth of a mile and turn into the CAL-MAT PIT

20 cont.

This simple change in the route to Cal-Mat pit takes the trucks away from Residencies, Schools and Hospital and Medical facilities in Sun Valley.

The County Flood Control or LADWP or a combination of the two will have to install a Left turn traffic signal at the Penrose St off-ramp of the South bound 5 FWY to prevent traffic congestion at that place. I believe that is the only money that needs to be spent on what will be a simple change in route to avoid a lot of hardships and health hazards for residents in Sun Valley.

**To return to the Spreading grounds from Cal Mat** Leave the Cal-Mat Pit at the normal exit on Glenoaks-- go west to Osborne on Glenoaks to Osborne and turn RIGHT ( North) on Osborne past Hansen Dam park and then Go RIGHT on to foothill Blvd where they will pass about six apartment buildings (to the right)and the go on to the 210 FWY at the Osborne St entrance and proceed to the 118 FWY and take the south bound FWY to Arleta and Devonshire exit they arrive back at the Spreading Grounds and will avoid almost all the residents domiciles.

Vulcan Materials will have to put up a Sound barrier wall to eliminate any increase in noise from the Cal-Mat pit. (Also the Boulevard Pit will need sound barriers, if it is decided that needs to be used,-It is probably the closest pit to homes)

21

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The Cal-Mat pit has a restriction on the number of trucks that can be allowed to access that pit. We are not sure how that might be worked out without creating other problems. It needs discussion and resolution. We also need to discuss running these trucks at hours not in peak traffic times and possibly at night. Especially at night during daylight savings time.

22

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---

There are three inert landfills named as designated sites BUT no amount of debris is mentioned as to how much is going to which landfill. That cannot be allowed! We need to be told NOW what streets are going to be impacted during which hours and on what days. This is all very poorly thought out in fact we feel that very little time and effort was put into these Haul Routes and where the final destination is going to be. What about the hours of the day that these trucks will be running and what about days of the week?

23

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Maybe we need to discuss running some of these truck trips on Saturday and Sundays and also we need to discuss staggering the hours that these trips occur so that we are not traveling when most people are traveling to and from work. After Daylight Savings time we should be running these trucks at a later time in the morning after drive time and running them in the evening (Daylight) till dark when a number of people will already have reached their homes.

24

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The Cal-mat pit is presently operating under a permit from Cal-Recycle and a CUP from the City of Los Angeles wherein they are allowed to take a little over three hundred truckloads of inert debris into that landfill per day. We are NOT aware of a City Permit or State permit to take in debris in either of the two other pits- Boulevard pit on San Fernando Rd or the Sheldon Pit located on the west side of Sheldon St at Glenoaks Blvd. (East of the new FED-Ex Facility) If there are permits from LEA or a CUP from La CITY Planning we would like to know the provisions of those permits.

25

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Your Haul Route "B" traversing Glenoaks Blvd to and from the pits on Sheldon Ave is another poor route as it goes past many residences in Pacoima on Glenoaks Blvd from Osborne to Paxton and more residences on Paxton St going to and from the Spreading Grounds. It too passes schools along the way, it passes Telfair Elementary also McClay Elementary and middle school on Osborne between Gain and Pierce St

26



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This is another example of little if any thought being put into the hardships this will cause to residences and “Sensitive Receptors”

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26 cont.

We would like to have ALL trucks going to and from the Pit that they are depositing dirt in have magnetic signs attached to the two doors on the cab saying “Pacoima Spreading Grounds” , That way residents of the affected communities will be able to identify these trucks and report them if they are traveling on roads other than the designated Haul Route.

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27

The area of Sun Valley that you are planning to travel thru was declared an “ENVIRONMENTAL JUSTICE ZONE” Back in about 2008 by the City Council (See attached map) \*\*\*\*Please note that Sheldon St is in about the center of this zone and we are trying to draw the proposed haul route around the EV Justice Zone and most importantly away from residences

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The areas of Arleta and Pacoima and Sun Valley have been declared an area that needs special consideration as a Clean Streets-Green Streets area by the Los Angeles City Council and needs special consideration to avoid placing environmentally unfriendly projects in these areas.

28

We are asking that these haul Routes be removed from consideration until the LACFCD sits with representatives from the three areas and discuss how we can get these trucks thru our neighborhoods without endangering the health of our residents.

If LACFCD brings maps with the schools and hospitals on them we can chart a haul route to a designated landfill in one meeting it might entail them paying for a traffic signal at Tuxford St and routing the trucks mostly on freeways.

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Thank You for your consideration

Mike O’Gara  
Sun Valley Area  
Neighborhood Council  
Planning Chair

E Mail:

Cell:








CD7

CD2

CD6

# Environmental Justice Study Area

## Legend

-  Modified Boundary
-  Environmental Justice Study Area
-  Council District 7
-  Council District 2
-  Council District 6

1 ZMA.LANDBASE



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**Sun Valley Area Neighborhood Council (SVANC)**

**February 24, 2016**

SVANC-1 Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. Pursuant to Section 15072(b) of the State CEQA Guidelines, Mr. O'Gara of the Sun Valley Area Neighborhood Council has been added to the Project mailing list. The most convenient place to find information is on the webpage maintained for the Project at: <http://dpw.lacounty.gov/wrd/Projects/PacoimaSG/index.cfm>. All comments in the "Letter of Concern" dated February 15, 2016, addressed to the County Supervisors Antonovich and Kuehl and City Councilmembers Martinez and Fuentes are addressed below as Responses SCANC-2 through SVANC-14, below, and all comments in the letter dated February 23 and addressed to the LACPW are addressed below as Responses SVANC-15 through SVANC-28, below.

SVANC-2 This comment is acknowledged. The LACFCD performed a technical evaluation of alternative haul routes based on the suggestions of the SVANC and other commenters. The Recirculated MND addressed three haul routes, including Modified Haul Route A that reflects the Sun Valley Area Neighborhood Council comment letter and new Haul Route C to Sunshine Canyon Landfill. Haul Route B would remain the same as presented in the 2016 MND. None of the proposed haul routes include side residential streets, defined as those streets serving almost exclusively traffic to and from individual residences. The proposed haul routes are detailed beginning on page 2-5 of the Recirculated MND and are illustrated on Exhibits 2-7 through 2-11.

Modified Haul Route A is based on the SVANC letter and would involve loaded trucks traveling eastbound on Devonshire Street (from the east side of the spreading grounds) and turning immediately north on Arleta Avenue, northeast on Paxton Street to access I-5 Southbound, and either (1) taking the Sheldon Street exit heading northwest on Laurel Canyon Boulevard and northeast on Branford Street to access the Boulevard Pit, or (2) taking the Penrose Street exit then heading southwest on Penrose Street, northwest on San Fernando Road, northeast on Tuxford Street, northwest on Glenoaks Boulevard to access the Cal-Mat Pit, or continuing further on Glenoaks Boulevard and making a right turn on Sheldon Street to access the Sheldon Pit. Empty trucks would either travel northeast on Branford Street from the Boulevard Pit then northwest on Glenoaks Boulevard, travel northwest on Glenoaks Boulevard from the Cal-Mat Pit, or travel southwest on Sheldon Street from the Sheldon Pit then northwest on Glenoaks Boulevard, northeast on Osborne Street and Foothill Boulevard to access I-210 Westbound, merging onto SR-118 Westbound, taking the San Fernando Road exit, making a right turn on Paxton Street heading southwest, southbound on Arleta Avenue and then on Devonshire Street into the spreading grounds.

Haul Route B would involve loaded trucks traveling eastbound on Devonshire Street and turning immediately north on Arleta Avenue, turning northeast on Paxton Street, turning right onto San Fernando Road, and travelling southeast to either (1) turn southwest on Branford Street to access the Boulevard Pit or (2) turn northeast on Branford Street, then southeast on Glenoaks Boulevard and northeast on Sheldon Street to access either the Sheldon Pit or the Cal-Mat Pit. Empty trucks would retrace the same route to return to the spreading grounds.



Haul Route C would involve loaded trucks traveling westbound on Devonshire Street to access I-405 Northbound and then merging onto I-5 Northbound, taking the Roxford Street exit heading southwest and turning immediately northwest on Sepulveda Boulevard, continuing northwest on San Fernando Road, and then turning left on Sunshine Canyon Road to access the Sunshine Canyon Landfill. Empty trucks would retrace the same route to return to the spreading grounds.

It is noted that only an MND, and not an Environmental Impact Report (EIR), has been prepared for the Project. It is also noted that there would not be soil export (hauling) on seven days per week; the soil export would occur during a maximum 8-hour period conducted within the hours of 9:00 AM to 5:30 PM, Monday through Friday, within the 14-hour window (which ends at 9:00 PM) allowed under City standards. It is noted that sensitive receptors along both Haul Route A and Haul Route B, as addressed in the 2016 MND, were identified and subject to a quantitative Health Risk Assessment related to diesel particulates and other emissions from the truck traffic.

**SVANC-3** The LACFCD conducted notice of the 2016 MND consistent with all requirements of Section 15072 of the State CEQA Guidelines; additionally, the LACFCD extended the public review period and held a public meeting for both the 2016 MND and the Recirculated MND although not required under CEQA. The SVANC was included on the mailing list for the Recirculated MND. The Recirculated MND analyzed a total of 1.37 million cubic yards (mcy) of sediment being exported off-site for disposal. Currently, the total amount of soil to be excavated remains essentially the same, with approximately 1,377,977 cubic yards (cy), rather than 1,370,000 cy (1.37 million cubic yards), to be exported off-site for disposal. As discussed in Section 4.0, disposal of the additional 7,977 cy of sediment would not result in a new or more significant environmental impacts than described in the Recirculated MND. Please refer to Response SVANC-4, below, for a discussion of the revised Project schedule. Under the proposed Project analyzed in the Recirculated MND, between 372 and 478 total daily truck round trips per work day were anticipated to be required; of this, a total of between 208 and 268 trip ends to the Vulcan-owned pits in Sun Valley on Modified Haul Route A and Haul Route B were expected to occur. However, as discussed in Section 4.0, Clarifications, of this document, due to requirements and limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements, sediment export is estimated to result in a maximum of 476 trip ends (or 238 inbound and 238 outbound trips to the disposal facility and back), including 276 trip ends to and from the Cal-Mat pit and 200 trip ends to and from Sunshine Canyon Landfill. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.

**SVANC-4** This comment is acknowledged. The Project details cited are correct with the exception that soil export would occur for five days per week. It is noted that the 2016 MND addressed a Monday through Saturday schedule. However, based on public comments received on the 2016 MND and in connection with redefining the haul routes, it was decided to reduce the work week by eliminating Saturday activities. With this change, the length of the Project was extended from approximately 18 months to approximately 20 months. As discussed in the Recirculated MND, analysis of the revised Project would result in less than significant impacts with mitigation measures (please refer to Section 5.0, Mitigation

Monitoring and Reporting Program, for a description of all mitigation measures). However, subsequent to circulation of the Recirculated MND, and as discussed further in Section 4.0, the LACFCD has determined that the anticipated construction period will be extended from approximately 20 months up to a maximum of 36 months. This extension is as a result of limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.

SVANC-5 Please refer to Responses SVANC-3 and SVANC-8, above and below. Also, as discussed in Section 2.4, Project Description, of the Recirculated MND, “the acceptance of excavated sediment from the Project site at any of the Vulcan Materials-owned pits or the Sunshine Canyon Landfill would not result in an exceedance of their permitted daily limit; each facility must operate within the restrictions set forth in their operating permits. As such, there would be no change in the environmental conditions at or around the sediment disposal locations as a result of the Project.” In other words, the proposed Project is not creating new traffic and any impacts thereof associated with acceptance of excavated sediment of these facilities that may not otherwise occur. If either Sunshine Canyon or the Vulcan pits did not accept sediment excavated from the Pacoima Spreading Grounds, these facilities would have capacity to accept material from other sources. The transport of any material from other sources would also travel on the freeways and surface streets in and around these facilities, as part of regular operations up to the limits prescribed in their respective permits.

It is noted the 2016 MND and the Recirculated MND were available at the Pacoima Branch Library. As with the 2016 MND, the LACFCD has met or exceeded all requirements of CEQA and the State CEQA Guidelines throughout the CEQA process. The CEQA process for an MND does not require any public meetings or other types of outreach, nor requires written responses to comments. Finally, the LACFCD voluntarily used two different methods of circulating the MND, where one is required, and expanded the radius of direct mailing from the owners and occupants of property adjacent to the Project site based on the assessor rolls, as described in the State CEQA Guidelines, to those within 500 feet. As such, the LACFCD made substantial efforts to notify and inform the community that would be affected by Project implementation and has continued to refine the Project construction scenario and include additional amenities based on public feedback.

SVANC-6 The Revised Traffic Impact Study (Revised TIS), reflecting the redefined haul routes, determined there would be less than significant impacts related to traffic congestion (i.e., intersections, freeway ramps, queuing) (refer to Section 3.16, Transportation/Traffic of the 2016 MND and the Recirculated MND). The LACFCD will perform a pre- and post-Project evaluation of the pavement on the haul routes.

Sensitive receptors along both Haul Route A and Haul Route B, as addressed in the 2016 MND, were identified and subject to a quantitative Health Risk Assessment (HRA) related to diesel particulates and other emissions from the truck traffic. As discussed on page 3-22 of Section 3.3, Air Quality, of the Recirculated MND, “The majority of the estimated health risk from TACs [toxic air contaminants] can be attributed to relatively few compounds, the most important of which is diesel particulate matter (diesel PM).” “An analysis of construction-

related impacts from anticipated diesel PM (TAC) emissions on sensitive receptors near the spreading grounds was performed based on dispersion modeling (i.e., the HRA)". This analysis has been revised to reflect the redefined haul routes, and consistent with the findings of the 2016 MND, the Recirculated MND determined there would be a less than significant impact related to diesel emissions from the haul trucks.

SVANC-7 The LACFCD has performed a technical evaluation of alternative haul routes based on public comments received on the 2016 MND. This involved additional traffic analysis and revised air quality, greenhouse gas, health risk assessment, and noise analyses in the Recirculated MND to determine the relative effects on these environmental issues compared to the haul routes addressed in the 2016 MND. Please refer to Response SVANC-2, above, for details of the revised haul routes. It should be noted that, as part of preparation of the 2016 MND, the LACFCD met with the LADOT to discuss the construction traffic analysis and the potential to construct temporary intersection improvements, such as lane striping, signage, and signal changes. Based on the results of the traffic analyses in the 2016 MND and the Recirculated MND, all potential intersection impacts would be reduced to a less than significant with implementation of mitigation measures. As such, a new traffic signal at the Penrose Street off-ramp or other intersections is not required.

SVANC-8 It should be noted that at this time, it is anticipated that all sediment export to the Vulcan-owned facilities would go to the Cal-Mat Pit. "The LACFCD has coordinated with Vulcan to ascertain that these facilities have the capability to accept and process this volume of sediment in the expected time frame." (Refer to page 2-4 of the 2016 MND). The traffic, air, and noise analyses assessed a scenario in which 100 percent of all soil exported would go only to one of the three Vulcan pits (refer to page 2-5 of the 2016 MND) as part of the proposed Project.

Subsequent to the public review period and at the same time the comments received were being reviewed and considered, the LACFCD learned that the Vulcan-owned sediment disposal sites would no longer be able to accept the total volume of excavated soil from the Project site. Therefore, revisions were made to the sediment disposal locations and the haul routes. As discussed on page 2-5 of the Recirculated MND, "A total of 2,200 [tons per day] tpd of excavated sediment would be transported to Sunshine Canyon Landfill; and a total of 2,800 tpd of excavated material would be transported to the following Vulcan-owned sediment disposal sites: Cal-Mat Pit, Boulevard Pit, and Sheldon Pit (see Exhibit 2-1). Like the 2016 MND, the traffic, air, and noise analyses in the Recirculated MND assessed a scenario in which 100 percent of all soil exported would go only to one of the three Vulcan pits. While the volume of soil transport from the Project site to the Vulcan pits in Sun Valley is reduced, as discussed in Section 2.4, Project Description, of the Recirculated MND, "the acceptance of excavated sediment from the Project site at any of the Vulcan Materials-owned pits or the Sunshine Canyon Landfill would not result in an exceedance of their permitted daily limit; each facility must operate within the restrictions set forth in their operating permits. As such, there would be no change in the environmental conditions at or around the sediment disposal locations as a result of the Project." Subsequent to circulation of the Recirculated MND and as discussed in Section 4.0, during final negotiations with the disposal facilities, LACFCD was informed that Sunshine Canyon Landfill would accept up to 6,600 tons per week, which is less than anticipated in the Recirculated MND. This and other adjustments to the hauling and disposal

conditions resulted in an extension of the construction period from approximately 20 months to a maximum of 36 months. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.

SVANC-9 Operations at any of the Vulcan Materials-owned pits would not exceed the amount already permitted for each facility through acceptance of the excavated soil from the Pacoima Spreading Grounds. Vulcan Materials is responsible for ensuring that each Vulcan pit operates within the parameters of each facility's permit.

SVANC-10 Please refer to Response SVANC-2, above.

SVANC-11 The possibility of staggering haul truck trips to avoid AM and PM peak hours was assessed early in the Project development process. Due to the volume of soil to be exported and because the peak hours occur for more than five hours each day, it was determined that this would unduly limit the daily export from the site. The length of the Project would be substantially extended, and the total cost of the Project would be substantially increased. There are limits on the available funding; all of which is via public funds (i.e., State bond measures, LACFCD, and Los Angeles Department of Water and Power [LADWP]).

The soil export would occur for a maximum 8-hour day conducted within the hours of 9:00 AM to 5:30 PM, which is within the 14-hour window (ending at 9:00 PM) allowed under City standards. There would not be nighttime hauling – although there may be hauling after sunset depending on the time of year – as part of the Project, as this is not permitted by the City for construction activities. Regardless, this would likely have a greater impact, particularly related to noise, than the planned construction schedule.

SVANC-12 Please see Responses SVANC-2, SVANC-3, and SVANC-6, above. With regard to environmental justice, consistent with the recommendations of the SVANC's letter, Haul Route A was modified as part of the Recirculated MND. As discussed in the Recirculated MND, analysis of the revised Project would result in less than significant impacts with mitigation measures (please refer to Section 5.0, Mitigation Monitoring and Reporting Program, for a description of all mitigation measures). As such, there would be not a disproportional impact to minority or low-income populations.

SVANC-13 Sensitive receptors along both Haul Route A and Haul Route B, as addressed in the 2016 MND, were identified and subject to a quantitative Health Risk Assessment related to diesel particulates and other emissions from the truck traffic. This analysis has been revised to reflect the redefined haul routes, and consistent with the findings of the 2016 MND, the Recirculated MND determined there would be a less than significant impact on sensitive receptors related to emissions from the haul trucks. However, as noted previously, the LACFCD has evaluated alternative haul routes based on public comments received on the 2016 MND, and this involved additional traffic analysis and revised air quality, greenhouse gas, health risk assessment, and noise analyses in the Recirculated MND to determine the relative effects on these environmental issues compared to the haul routes addressed in the 2016 MND. As discussed in the Recirculated MND, analysis of the revised Project would result in less than

significant impacts with mitigation measures (please refer to Section 5.0, Mitigation Monitoring and Reporting Program, for a description of all mitigation measures).

SVANC-14 It is correct that February 25, 2016, was the close of the public review period for the 2016 MND. As stated on page 1-2 of the 2016 MND, and page ES-2 of the Executive Summary, provided at the Community Meeting on January 28, 2016 and posted on the LACFCD's website subsequent to the public meeting, the Los Angeles County Board of Supervisors must consider the 2016 MND together with any comments received during the review period. This document is a part of that consideration. As discussed above, the LACFCD has evaluated alternative haul routes based on public comments received on the 2016 MND.

SVANC-15 This comment is acknowledged. Please refer to Responses SVANC-2 and SVANC-6, above.

SVANC-16 Please refer to Response SVANC-3, above. The LACFCD has evaluated alternative haul routes based on public comments received on the 2016 MND. As requested, the SVANC has been added to the mailing list and received the Notice of Intent (NOI) for the Recirculated MND. The NOI provided a summary of the Project, details of where the Recirculated MND could be reviewed, including on the County's website for the proposed Project, as well as details of the public meeting. Upon requests from the public to extend the review period, the LACFCD extended the public review period to 48 days, formally accepting comments through December 31, 2018. It is noted the Arleta Neighborhood Council and Mission Hills Neighborhood Council were on the 2016 MND mailing list and participated in numerous meetings with the LACFCD regarding the Project prior to release of the 2016 MND. The 2016 MND and the Recirculated MND were also available at the Pacoima Branch Library.

As with the 2016 MND, the LACFCD has met or exceeded all requirements of CEQA and the State CEQA Guidelines throughout the CEQA process. The CEQA process for an MND does not require any public meetings or other types of outreach, nor require written responses to comments. Finally, the LACFCD voluntarily used two different methods of circulating the MND, where one is required, and expanded the radius of direct mailing from the owners and occupants of property adjacent to the Project site based on the assessor rolls, as described in the State CEQA Guidelines, to those within 500 feet. As such, the LACFCD made substantial efforts to notify and inform the community that would be affected by Project implementation and has continued to refine the Project construction scenario and include additional amenities based on public feedback.

SVANC-17 Please refer to Response SVANC-3, above. The LACFCD has evaluated alternative haul routes based on public comments received on the 2016 MND. The Revised Traffic Impact Study, reflecting the redefined haul routes, determined there would be less than significant impacts related to traffic congestion (i.e., intersections, freeway ramps, queuing).

SVANC-18 The LACFCD will perform a pre- and post-Project evaluation of the pavement on the haul routes.

SVANC-19 Sensitive receptors along both Haul Route A and Haul Route B, as addressed in the 2016 MND, were identified, and a quantitative Health Risk Assessment related to diesel particulates and other emissions from the truck traffic was prepared to

assess the potential impacts. This analysis has been revised to reflect the redefined haul routes, and consistent with the findings of the 2016 MND the Recirculated MND determined there would be a less than significant impact related to emissions from the haul trucks.

- SVANC-20 The LACFCD has evaluated alternative haul routes based on public comments received on the 2016 MND. Please refer to Responses SVANC-2, SVANC-3, SVANC-7, and SVANC-8, above, for a detailed discussion of the adjustments to haul routes.
- SVANC-21 Operations at any of the Vulcan Materials-owned pits identified in the 2016 MND would not exceed that already permitted for each facility as a result of the Project. There would be no noise impact at each Vulcan pit as a result of the Project, and as such there would be no need to require sound walls to be installed at these facilities.
- SVANC-22 Please refer to Responses SVANC-5 and SVANC-11, above.
- SVANC-23 Please refer to Response SVANC-8, above.
- SVANC-24 Please refer to Response Responses SVANC-5 and SVANC-11, above.
- SVANC-25 Please refer to Response SVANC-9, above.
- SVANC-26 The LACFCD has evaluated and made adjustments for alternative haul routes based on public comments received on the 2016 MND. Please refer to Response SVANC-3, above, for a detailed discussion of this issue.
- SVANC-27 The attachment of signs to the doors of the haul trucks is not considered practicable by the LACFCD. The haul truck operators are independent contractors, and the same group of operators would not be part of Project operations every day. Additionally, using and leaving the signs on all trucks operating on any given day by each haul truck contractor is not fully enforceable. Any violation of the vehicle code on public roads, including haul trucks emitting dust from the bed, is enforceable by law enforcement (i.e., Los Angeles Police Department and California Highway Patrol). Finally, there is no significant impact identified related to the haul truck routes that would require additional measures.
- SVANC-28 The LACFCD has evaluated alternative haul routes based on public comments received on the 2016 MND. Please also refer to Responses SVANC-3 and SVANC-12, above.

## **2.3    INDIVIDUALS**

- Yolie Anguiano, February 24, 2016.
- Benito Benny Bernal, January 5, 2016.
- Pamela Cardillo, February 24, 2016.
- Christine Greene, February 25, 2016.
- Michael J. Hillen, January 13, 2016.
- Betty Ley, February 25, 2016.
- Cliff Lobell, February 1, 2016.
- Elizabeth Marx, February 23, 2016.
- Paul Marx, PhD, February 9, 2016.
- Vera Marx, February 9, 2016.
- Susan Milne, February 25, 2016.
- Maria Polonski, February 24, 2016.
- Jim Read, February 25, 2016.
- Cindy Robles, February 20, 2016.
- Juan Salas, February 25, 2016.
- Walter and Wanda Shipe, January 21, 2016.



**From:** Yolie Anguiano  
**Sent:** Wednesday, February 24, 2016 4:32 PM  
**To:** DPW-SpreadingGrounds  
**Cc:** Nature Parkway  
**Subject:** [Caution: Message contains Redirect URL content] Response to PSG Project - MND

Response to the Pacoima Spreading Grounds Project, MND

Anguiano1

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### **1. Why Only one bike lane on the Spreading Grounds will be incorporated?**

For too long has the North East San Fernando Valley residents done without adequate accessible areas for recreation. Since we live an area that suffers from obesity and high rates of asthma please extend the bike path to cover all of the Pacoima Spreading Grounds perimeter. This will allow for a bike path to connect Arleta/Devonshire Park to the proposed bike path along the Pacoima Diversion Channel to the residents on Filmore Street to Devonwood Park and finally close the bike path to the already existing East San Fernando Valley Nature Parkway bike path.

1

### **2. Why not remove all chain link fences and replace it with the proposed steel gate?**

Removing the chain link fence in front of homes on Filmore Street will improve the aesthetics of the Pacoima Spreading Grounds which faces them. The chain link fence acts like a trash collector which sustains the neighborhood susceptibility to blight.

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### **3. Will the recreation areas surrounding the Pacoima Spreading Grounds be closed for public access?**

Since trucks will be loading and transporting dirt- does this mean users of the Nature Parkway, Devonwood and Arleta/Devonshire Park will be prohibited to enter while construction is in place? How about the bus stop on Devonshire and Arleta, will they be re-routed?

2

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### **4. What is included in the construction evaluation survey?**

Please include xeriscaping the perimeter of the Pacoima Spreading Grounds to be part of the post construction. We want all of the entities that will oversee the project, LA County

3

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Supervisors, LA County Flood Control District, LADWP, LA City Council District 6 & 7 to use this water preservation project to also incorporate a community benefit plan. This means that lights for safety and xeriscaping be constructed once the project is complete. Think of the Silver Lake reservoir in the neighborhood of Silver Lake. We want that too in the Pacoima/Mission Hills/Arelta bordering neighborhoods of Los Angeles.

---

3 cont.

Thanks for your time and attention.

Yolanda Anguiano

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Yolie Anguiano,

[East San Fernando Valley Nature Parkway, a community CA native plant garden](#)

**Yolie Anguiano (Anguiano1)**

**February 25, 2016**

- Anguiano1-1 Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. The addition of features requested by the community has been considered by the LACFCD and those determined to be feasible have been included in the Project: (1) opening the existing paved access road located along the west side of Pacoima Wash and outside the proposed tubular steel fence, between Devonshire Street and Filmore Street, for public use as a hiking and bike riding path; and (2) steel fencing along the public-facing perimeter of the spreading grounds, in addition to the perimeter segments discussed in the Recirculated MND. All features (e.g., fencing, bike path) added to the Project beyond the water conservation-related components, add to the total cost for the Project. There are limits on the available funding; all of which is via public funds (i.e., State Proposition 84 Grant, LACFCD, and LADWP). Further recreation amenities around the Project site, such as a bike path in the City right-of-way around the remainder of the spreading grounds, would have to be implemented at the discretion of the City of Los Angeles. Because this comment does not address the environmental analysis in the 2016 MND or Recirculated MND, no further response is required.
- Anguiano1-2 The East San Fernando Valley Nature Parkway, Devonwood Park, and Devonshire Arleta Park would not be closed during implementation of the Project and would continue current operations. The bus stop at Devonshire Street and Arleta Avenue would remain in its current location and continue normal operations in terms of routes and number of buses. Where Project-related haul truck and other construction traffic travels on Devonshire Street and Arleta Avenue or construction activity occurs on Devonshire Street, there could be a slowdown of bus operations at this bus stop limited to the Project's planned construction hours (i.e., eight hours per day, Monday through Friday). As disclosed in Section 3.16, Transportation/Traffic, of the Recirculated MND, the Project's trip generation would affect intersection operations, measured as Volume-to-Capacity (V/C) ratios, but that the quantitative change in the V/C ratios did not exceed Los Angeles Department of Transportation significance thresholds. This finding includes study intersection no. 1, Arleta Avenue and Devonshire Street. Accordingly, while bus traffic at this bus stop may be slowed due to Project implementation, the degree of slowing (i.e., change in V/C ratios) would be less than significant under CEQA.
- Anguiano1-3 Please refer to Response Anguiano1-1, above.

From: Benny Bernal  
Sent: Tuesday, January 05, 2016 4:52 PM  
To: Sheila  
Subject: Pacoima Spreading Grounds

Dear Supervisor Kuehl,

**Bernal**

Please accept this letter and request regarding the proposed Pacoima Spreading Grounds Project. I am writing as a direct result of the concerns and questions raised by residents at a community meeting on the Project.

Below is the text from the Project Web Posting.

"Pacoima Spreading Grounds was built in the 1930s and is one of the major water conservation facilities that provide groundwater recharge for the San Fernando Basin. Currently, the spreading grounds' percolation rate is reduced due to a low permeability clay layer underlying the infiltration basins. The proposed project will increase the spreading grounds' storage capacity and percolation rate and simplify operations by combining basins and constructing new interbasin structures."

This very text has raised questions and we believe invalidate the "Mitigated Negative Declaration"

### "3.2 DETERMINATION

On the basis of this initial evaluation:

1

2. I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. "

More from the Project Report:

"Approximately 1.6 million cubic yards (cy) of sediment will be excavated in order to completely remove the underlying clay layers; however, only 1.37 million cy of sediment will be exported from the site. The remainder of the sediment will be used to backfill the existing intake channel or be returned to the spreading basins to bring the basin inverts up to their finished elevation."

As a long time resident of the community, issues concerning the Spreading Grounds have come up for discussion several times in the past.

One such discussion directly involved the Clay layer and it being a vital component in the natural filtration process. The Clay was said to reduce the percolation process and in doing so the natural filtration process would be more effective. This was presented as an important benefit to insuring the quality of water in storage was maintained.

2

How will the removal of the Clay Layer impact the Natural Filtration Process? This must be determined in the EIR as it impacts the purity and quality of the existing water storage.

---

The report on the Project does address the "possible" traffic challenges caused by the amount of truck trips required each day for an extended period of time. It does not however address the current traffic patterns germane to the area due to the congestion on neighboring streets and Freeways, especially during rush hour. The freeway is backed up in each direction for miles and as such many commuters use the impacted streets as an alternative. This too needs to be addressed in an EIR

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3

There are many components to the community which will be directly impacted by the dramatic increase in air contaminants caused by the project and the tools/vehicles needed to complete it. Noise, dust, and increase vehicle exhaust must be addressed and it can be done by an EIR.

---

4

In addition to the above concerns, we must also address the issue of the projects impact on the Wildlife which frequents the area. Residents over the years have observed a variety of wildlife frequenting the area. This includes various birds as well as an occasional Coyote. The report does not address this aspect.

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5

While we agree on the importance of water storage and expanding the availability of storage, I believe we also agree the safety factor cannot be sacrificed in the name of expediency.

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6

Therefore, we as a community make this formal request for you as our representative to halt the project until a proper and we believe much needed Environmental Impact Report can be completed.

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Thank you,

Benito Benny Bernal, Mission Hills,

Sent from my iPhone



**Benito Benny Bernal (Bernal)**

**January 5, 2016**

- Bernal-1      Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged.
- Bernal-2      Removal of the clay layer would not reduce the effectiveness of the soil's filtration process such that water quality in the San Fernando Groundwater Basin would be adversely affected. Soil is a highly effective filter of impurities in the water, with or without a clay layer(s), especially as the depth to the groundwater basin fluctuated between 300 feet and 350 feet below ground surface between the years 2004 and 2008 (LACDPW 2009) (refer to page 3-31 of the 2016 MND).
- Bernal-3      The existing road network and traffic patterns are fully described in the Traffic Impact Study prepared for the Project (Appendix F of the 2016 MND). In particular, Figure 4-1 of the Traffic Impact Study illustrates the existing lane configurations of all intersections studied, and the traffic counts used as the basis of the Traffic Impact Study also document the numbers and types of vehicles traveling in each lane of each intersection. For purposes of brevity, the totality of this information is not repeated in the 2016 MND traffic section, instead the MND section focuses on the results of the study. The Traffic Impact Report in its entirety is available for review, as Appendix F to the 2016 MND.
- Additionally, it should be noted that under CEQA, an EIR is required when there would be impacts that would not be avoided or reduced to a less than significant level with project changes or mitigation measures (Section 15064(a)(1) of the State CEQA Guidelines). Therefore, given that all potential impacts of the Project are reduced to less than significant levels with incorporation of mitigation measures, an MND is the appropriate CEQA document for the Project.
- Bernal-4      As indicated in Response Bernal-3, above, under CEQA, an EIR is required when there would be impacts that would not be avoided or reduced to a less than significant level with project changes or with mitigation measures (Section 15064(a)(1) of the State CEQA Guidelines). The 2016 MND acknowledges the Project would result in increased air emissions and noise generation and quantifies these increases to compare to the quantitative thresholds for these environmental topics (i.e., air quality, noise). As discussed in the 2016 MND and affirmed by the additional technical studies prepared based on the redefined haul routes, there would be no significant impacts after changes to the Project and/or implementation of mitigation measures. Therefore, an MND is the appropriate CEQA documentation for the Project.
- Bernal-5      Section 3.4, Biological Resources, of the 2016 MND addresses potential impacts to wildlife. There is no potential for sensitive wildlife species to occur on the Project site (refer to page 3-23 of the 2016 MND). Wildlife species common to urban areas are not adversely affected by construction projects as they are able to relocate, and their populations remain sustained such that the species is not in danger, unlike a Federally- or State-Threatened or -Endangered species. As discussed on page 3-24 of the 2016 MND, the Migratory Bird Treaty Act of 1918 (MBTA) and the *California Fish and Game Code* protect nesting birds and raptors and would be applicable to the Project. As Project implementation necessitates that construction

activities be initiated during the breeding season for nesting birds (March 1–September 15) and nesting raptors (January 1–July 31), MM BIO-1 requires a pre-construction nesting bird/raptor survey prior to construction to ensure compliance with the MBTA and describes the process for protecting any active nests identified while construction is ongoing. With implementation of MM BIO-1, potential impacts to nesting migratory birds and raptors during their breeding seasons would be reduced to a less than significant impact (refer to page 3-24 of the 2016 MND).

Bernal-6      Please refer to Response Bernal-4, above.

From: Pamela Cardillo  
Sent: Wednesday,  
February 24, 2016 10:59 AM  
To: DPW-SpreadingGrounds  
Subject: Re Pacoima Spreading Grounds Improvement Projects --Questions To: John Bodenchak

Good Afternoon--  
We are part of the Mission Hills Community.

**Cardillo**

Here is our list of questions.

> **From: Pamela Cardillo**

>>>> Regarding the PSG MND Report, please be specific with your answers; some information was ambiguous.

>>>>

>>>> 1) How long will this project take to complete? 1

>>>>

>>>> 2) How many hours per week will workers work..

>>>>

>>>> 3) How long is each work day? 2

>>>> 8hrs. 12 hrs. Or?

>>>>

>>>> 4) When is the start/end date? 3

>>>>

>>>> 5) Will workers work when it's stormy, rainy weather or when it's windy? 4

>>>>

>>>> 6) Will the contractor be paid fully, even if the project is completed early? 5

>>>>

>>>> 7) Will the contract be extended if the work is not completed on schedule? 6

>>>>

>>> 8) Will the contractor be fined if the project is not completed on time? If not, pls. Include..such as 10% daily etc.. 7

>

>

>>> **From:**

>>> **Bobby Cardillo**

>>>

>>> 1) Re. Work trucks ( track & trailer, belly dumpers etc..) be specific; MND specifies;

>>>

>>> -- 40 trucks hauling dirt in 1hr.

>>>

>>> -- This means 1 min., 30 sec. Approx.. 8

>>>

>>> -- This seems impossible, pls. explain or correct.

>>>

>>>

>>> 2) How far down is water table. 9

>

>> From:  
>> Dorothy Brock

>>

>> -- Will our pool filters & pools be affected because of all the dust..

>>

>> -- If so, which organization is liable for claim submittal if our residential filters and pools are damaged in some way..

10

>>

>> -- Re the contractors and hiring

>

>> -- Are these local companies, U.S, based or foreign. We would prefer local, our citizens need jobs..

11

>>

>> -- Are the drivers & laborers unionized?

>>

>> -- Re the drilling --

>> At the depth of 24 ft., approx., and oil is reached, then what?

>>

>> \*\* Special Note\*\*

>>

>> In the early 60's, per Dorothy Brock, approx., 55 yrs. ago, residents here were notified by Standard Oil Co., OR a similar company, that oil was being drilled. This company paid our residents \$10.00 for 5 years..

12

>

> This has been noted as a concern..

>>>

>>>>

>>>> Thank  
you! Pamela  
Cardillo

>>>>

>>>> Sent from my iPhone

**Pamela Cardillo (Cardillo)**

**February 24, 2016**

- Cardillo-1 Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. The Project analyzed in the Recirculated MND was planned to be completed in one phase lasting approximately 20 months, beginning in Spring 2021 with completion anticipated in 2023. The LACFCD is currently anticipating a Fall 2021 start date. Specific start and end months have not been defined and will be determined closer to the initiation of the Project, if approved. Subsequent to circulation of the Recirculated MND, and as discussed further in Section 4.0, the LACFCD has determined that the anticipated construction period will be extended from approximately 20 months up to a maximum of 36 months beginning in Fall 2021. This extension is primarily as a result of limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.
- Cardillo-2 The construction would be performed in maximum 8-hour days conducted within the hours of 9:00 AM to 5:30 PM, although the City of Los Angeles allows a longer (14 hour) construction window from Monday through Friday. Therefore, the construction crew will work approximately 40 hours per week. It is noted that the 2016 MND addressed a Monday through Saturday schedule. However, based on public comments received on the 2016 MND and in connection with redefining the haul routes, it was decided to reduce the Project work week by eliminating Saturday activities.
- Cardillo-3 Please refer to Response Cardillo-1, above.
- Cardillo-4 As is the case with construction projects of all kinds, there are contingencies in place for inclement weather, whether that be rain, high winds, intense heat, or other conditions. The precise details of these contingencies would be determined as part of the contracting process and would also be decided on a case-by-case basis to protect both the construction workers and the surrounding community.
- Cardillo-5 The LACFCD would abide by all specifications in the contract to be executed with the selected Contractor. However, this does not bear on the environmental impact analysis presented in the Recirculated MND.
- Cardillo-6 As is the case with construction projects of all kinds, there are contingencies in place for the event the Project is not completed on schedule due to unforeseen delays. However, this does not bear on the environmental impact analysis presented in the Recirculated MND.
- Cardillo-7 The LACFCD would abide by all specifications in the contract to be executed with the selected Contractor, including penalties if applicable. However, this does not bear on the environmental impact analysis presented in the Recirculated MND.
- Cardillo-8 As discussed in the 2016 MND and the Recirculated MND, a combination of 14 cubic yard (cy) and 18 cy haul trucks were anticipated to be used to transport soil



to the disposal locations. As discussed on page 2-6 of the Recirculated MND, “Based on the revised schedule and disposal locations, the proposed Project would generate a total of 372 daily truck trip ends (186 inbound and 186 outbound) during a typical weekday using only 18-cy capacity haul trucks, plus 18 daily employee trip ends (390 trip ends total). This includes a total of 208 trip ends to the Vulcan pits on Modified Haul Route A and Haul Route B, and 164 trip ends to Sunshine Canyon Landfill on Haul Route C. Using solely 14-cy capacity trucks, the proposed Project would generate a total of 478 daily truck trip ends during a typical weekday, including 268 trip ends to the Vulcan pits and 210 trip ends to Sunshine Canyon Landfill, plus 18 employee trip ends (496 trip ends total). However, in reality, a combination of 14-cy and 18-cy capacity trucks would be used, resulting in between 372 and 478 total daily truck round trips, plus 18 employee round trips.” Not including employee trips, this equates to a range of 23 to 30 haul trucks per hour (i.e.,  $372/2 = 186/8 = 23.25$ ;  $478/2 = 239/8 = 29.875$ ) being loaded and outbound from the site, leaving either via Devonshire Street or Arleta Avenue, dependent on the disposal location. This was presented as the accurate and feasible average number of trucks hauling dirt in one hour.

However, as discussed in Section 4.0, Clarifications, of this document, due to requirements and limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements, sediment export is estimated to result in a maximum of 476 trip ends (or 238 inbound and 238 outbound trips to the disposal facility and back), including 276 trip ends to and from the Cal-Mat pit and 200 trip ends to and from Sunshine Canyon Landfill. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.

Cardillo-9      The historic high groundwater level in the vicinity of the Project site is approximately 210 feet below ground surface, and depth to groundwater fluctuated between 300 feet and 350 feet below ground surface between the years 2004 and 2008 (LACDPW 2009) (refer to page 3-31 of the 2016 MND).

Cardillo-10      Dust generation would be minimized through compliance with South Coast Air Quality Management District (SCAQMD) Rule 403, Fugitive Dust, as described in regulatory requirement (RR) AQ-1 in Section 3.3, Air Quality, of the Recirculated MND. Specifically, the Contractor would be required to comply with the Rule 403, including additional requirements for large operations. This would include preparation of a Fugitive Dust Control Plan. However, as per standard operating procedures for the County, the Rule 403-compliant Fugitive Dust Control Plan will be prepared by the selected contractor, which has not been decided yet. The Fugitive Dust Control Plan must be submitted for review and approval by the LACFCD before Project initiation. Based on public comments on the 2016 MND, additional detail has been added to RR AQ-1 in the Recirculated MND regarding anticipated contractor requirements to manage fugitive dust on the spreading grounds and within the haul trucks under Rule 403. In addition to a Fugitive Dust Control Plan, Contractor compliance with Rule 403 requirements would include, but not be limited to:

- A Dust Control Supervisor, who possesses a current certification from SCAQMD, would be designated. The Dust Control Supervisor would be responsible for preparing the Dust Control Plan.

- Signage, meeting the standards of the Rule 403 Implementation Handbook, would be installed around the Project site prior to initiating any sediment removal activities. The signage would provide an appropriate contact person(s) and phone number(s) to call with dust-related complaints and the phone number of the SCAQMD compliance office. The signage would remain and be maintained for the length of the Project.
- Daily inspections would be conducted by the Dust Control Supervisor, and specific dust control actions would be documented on the SCAQMD Inspections form from the Rule 403 Implementation Handbook.
- Watering exposed surfaces at least three times per day or more during windy conditions. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour.
- Fugitive dust would be controlled during after-hours through the implementation of Best Available Control Measures (BACM) identified in SCAQMD Rule 403 and the Fugitive Dust Control Plan. Non-toxic soil stabilizers/dust suppressants, resistant to wind erosion, that create a crust on the surface may be selected and applied consistent with Rule 403.
- Traffic speeds on unpaved roads would be restricted to no more than 15 miles per hour.
- One or more devices would be installed at ingress/egress points to remove dirt from vehicle tires and undercarriage prior to leaving the site.
- All materials to be loaded for export would be pre-watered.
- All haul trucks would be covered with on board tarp).

Based on public comments on the Recirculated MND, the Contractor specifications for Rule 403 compliance shall state that all haul trucks will be covered with an on-board tarp. The alternate means of limiting dust generation from trucks of maintaining two feet or more of freeboard will not be an option. The text of RR AQ-1 has been edited accordingly in Section 4.0, Clarifications, of this document.

Based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM10; the requirements for this monitoring will be included in the Contractor specifications.

Therefore, the supposition that there would be dust generation adequate to adversely affect pools and pool filters does not reflect the dust management actions that would be implemented during all excavation activities. As such, this does not represent a new, significant environmental impact not disclosed in the Recirculated MND. In the event someone in the community experiences dust that is affecting their person or property, as noted above signage would be installed around the Project site with contact information for dust complaints and for the SCAQMD compliance office. However, based on the discussion above, it is unlikely that adequate dust that leaves the boundaries of the Project site such that someone's pool is damaged.

Cardillo-11      The County of Los Angeles has implemented a Local and Targeted Worker Hire Policy, which will be implemented for the Project, that requires at least 30 percent of total California construction labor hours be performed by a qualified local resident and at least 10 percent be performed by a County resident classified as a

targeted worker. Targeted workers include individuals who are County residents and face one or more of identified barriers to employment, including, but not limited to: no high school diploma or GED, annual income at or below the federal poverty level, protracted unemployment, is a custodial single parent, is a veteran or eligible spouse of a veteran, or is disabled.

Cardillo-12      The site-specific geologic investigation included drilling borings to depths greater than the proposed excavation activities, and no oil was encountered. Generally, oil and gas are encountered at depths of at least several hundred feet below the ground surface. As such, no oil would be encountered as part of the proposed Project.

John Bodenchak  
County of Los Angeles  
Department of Public Works  
Water Resources Division  
900 South Fremont Avenue  
Alhambra, CA 91803

February 25, 2016

Mr. Bodenchak,

Greene

These are my comments and questions to the IS/MND Pacoima Spreading Grounds Improvement Project.

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**Project Duration**

The MND hours of operation are 8 and 12 hour days, 6 days a week. But at the the LA County Flood Control IS/MND meeting it was stated that the hours of operation were 8 hours, 5 days a week. Please clarify the hours of operation. How does this impact the project duration? Will more work be done in less time, thus affecting the parameters of sound, air quality, traffic flow, etc.? Will the project be extended, thus rendering the spreading grounds unavailable for additional seasons?

1

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**Air Quality**

Why was the default SQAQMD table for all of Los Angeles used for average windspeed 2.2 m/s (4.9 mph)? A more accurate average wind speed from a local source would be Whiteman Airport 1.5 miles away from the spreading grounds.

2

The underestimation of the average wind speed in this area and the model should be recalculated to reflect the average wind conditions at this project, and not an overall average of LA County to determine if local construction impacts are still less that significant.

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**Sensitive Receptors** – On page 2 of Appendix A, the measurements of the off site receptors was listed, but no information on how this was obtained. It seems that the numbers are an overestimation of the properties abutting the spreading grounds. The closer the sensitive receptors are to the properties, the more accurate the impact the the neighbors.

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**Equipment Maintenance** – All equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

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**On-Road Truck Efficiency** – Construction equipment will be selected that has low pollutant emissions and high energy efficiency. Factors to consider include model year, alternative fuels (e.g., compressed natural gas, biodiesel, emulsified diesel, methanol, propane, butane, and low sulfur diesel) and lean NOx catalyst. Material delivery trucks and soil haul trucks shall **meet EPA 2010 model year NOx emissions requirements**. Requiring all

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contractors use equipment that meets the California Air Resources Board's most recent certification standard for off-road heavy duty diesel engines.

**Off-Road Equipment Efficiency** - All on-site construction equipment must meet EPA Tier 4 or higher emissions standards according to the following: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. The Construction Contractor shall supply a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit at the time of mobilization of each applicable unit of equipment.

5 cont.

All construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of nitrogen oxides and particulate matter.

Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available.

Construction equipment shall use cool exhaust gas recirculation.

Construction equipment shall use aqueous diesel fuel.

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Construction contracts shall explicitly stipulate that all construction equipment shall be properly tuned and maintained.

Lead agencies in the past have included equipment requirements in job bid specifications.

6

**Equipment Operation** – The contractor shall maintain and operate construction equipment to minimize exhaust emissions.

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**Idling times** - shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]) **No idling within 300 ft of residences. OR IDLING time of diesel powered construction equipment to two minutes.**

7

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**Street Sweepers** –During construction, streetsweepers that comply with SCAQMD Rules 1186 and 1186.1 shall be used. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

8

All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered three times per day, 3 hours apart, or more on windy days (gusts 15 mph or greater) .

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<b>Generator Use</b> – To the extent possible, power will be obtained from power poles (the electrical grid) rather than the use of temporary diesel or gasoline power generators.	9
<b>Traffic Speed Control</b> – During construction, traffic speeds on unpaved roads shall be reduced to 10mph or less.	10
<b>Construction during High Winds</b> – A High Wind Fugitive Dust Control Plan shall be prepared and implemented when wind speed or gusts exceed 15 mph. Suspend excavation operations when wind speeds or wind gusts exceed 20 mph.	11
<b>Meteorological stations</b> As there are no local meteorological stations nearby so an accurate local wind speed and direction cannot be assessed, wind speed monitors must be place on site with public access to data.	12
<b>Total Dust</b> - 1mg/M3	13
<b>Dust Control</b> – At the the LA County Flood Control IS/MND meeting there was no mention of the sifting of the 1.6 million cy of sediment that would be excavated. Is this on the Pacoima Spreading Grounds site? How will the dust be limited particularly on windy days? Will this sifting be done away from the private properties and Devonwood Park? Will barriers be used to control the fugitive dust?	14
Non-toxic soil stabilizers shall be applied according to manufacturer's' specifications, or water shall be applied, to all unpaved parking, unpaved or staging areas or unpaved road surface as needed and as directed by the Construction Manager to prevent visible dust to comply with Rule 403 for large operations.	15
Install temporary wind breaks as needed to reduce fugitive dust adjoining current construction areas.	16
<b>Vehicle Dirt Tracking</b> – Wheel washers or other approved stabilized construction ingress and egress devices shall be installed where trucks exit the construction site onto paved roads or equipment shall be washed-off leaving the site each trip.	17
<b>Truck Covers</b> – All trucks hauling dirt, sand, soil, or other loose materials shall be covered.	
<b>Dust Barriers</b> - Must be put in place when work is near (400 feet or less) of residences. A map of understanding can be used to determine when a dust barrier must be in place. Or one can be put in place for the entire duration of the project.	18
<b>Noise and Vibration</b>	19
<b>Construction Hours</b> -Construction shall be limited to:	

Weekdays: 7:00 AM to 6:00 PM Saturdays: 8:00 AM to 5:00 PM No construction on Sundays or national holidays.	19 cont.
<b>Noise:</b> <60dB averaging the speech frequencies (500, 1000, 2000, 4000 Hz) and < 80 dB using the A weighted scale 4 near residences	20
When construction occurs near residents, affected parties within 400 feet of the construction area shall be notified of the construction schedule prior to demolition, grading or building permit issuance. Notices sent to residents shall include a project hotline where residents would be able to call and issue complaints.	21
<b>Mufflers</b> - Construction equipment, fixed and mobile, shall be equipped with properly operating and maintained noise mufflers and intake silencers, consistent with manufacturers' standards. <i>*Each piece of equipment will be individually inspected to ensure proper operation of the muffler and silencer equipment.</i>	22
<b>Portable acoustical barriers/fences</b> must be used near residences. The height and length of the barriers shall be determined based on the location of the construction activity, specific construction equipment to be used (type and number) and distance to the receptors. - sound rated walls and windows would be required to meet the Title 24 interior noise level standard of 45 dBA, Ldn.	23
Any homes near where there is ingress and egress to the property will be used on a constant basis must have an acoustical barrier put in place.	
<b>Noise monitoring</b> shall be conducted a minimum of 4 days per week when construction is within 400 feet of a residence (residence is defined at property line)	
Disturbance Coordinator who will be responsible for responding to any complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g. bad muffler, etc.) and would require that reasonable measures be implemented to correct the problem.	24
<b>Predict noise levels</b> during construction activity based on the specific construction equipment to be used at the site. If equipment noise levels are not available, these shall be measured in on site and with data publicly available.	25
<b>Additional noise control measure</b> shall be implemented including: specialized mufflers or silencers, directional exhaust pipes, damping and sound absorptive material, and/or acoustical barriers near to residences and parks.	26
Perform all construction in a manner to minimize noise and vibration. The contractor should be required to select construction processes and techniques that create the lowest noise levels.	27

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Equip all internal combustion engines with a muffler of a type recommended by the manufacturer. Turn off idling equipment. Perform noisier operation during the times least sensitive to receptors. Locate laydown areas at least 300 feet from any residence or noise-sensitive receptor. Implement a noise control monitoring program to limit the impacts.

27 cont.

Require vibration monitoring during vibration-intensive activities.

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### **Traffic**

With the addition of up to 240 round trips from 14-cy haul trucks or 180 round trips from 18-cy haul trucks per day it seems implausible that this would not have an impact on the area surrounding the spreading grounds, particularly during peak traffic hours. How was this impact measured?

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Was any overflow of traffic considered? The area of San Jose Street between Arleta and Sharp Avenue does not have road bumps to slow down traffic which will likely increase during construction. Will this change in traffic pattern be monitored and addressed to keep the neighborhood safe?

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Ensure haul traffic is limited during prime commute 7-9am 4:30-6:30pm.

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At school commute times Haul Route B is limited so as not to affect Telfair and Sun Valley schools.

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No construction traffic including on side residential streets.

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All construction parking ON SITE.

33

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### **Monitoring**

**Monitoring of air and noise** - a county monitor must be on site at all time during the construction with the capability to monitor for noise, dust and emissions and is available to immediately deal with complaints arising from the project.. Average and peak readings, sample times, locations and instrumentation shall be recorded in the construction logbook. When a complaint is made, all exposure parameters must be check at the complaints workstation and documented in the construction logbook .If exposure exceed the limits works must stop until the problem is found and fixed.

34

Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 24 hours.

The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

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Sensitive receptors like residential units located within 200 feet of the edge the Pacoima Spreading Grounds shall undergo, **prior to project approval**, a screening-level health risk

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analysis to determine if cancer risk, hazard index, and/or PM2.5 concentration would exceed SCAQMD thresholds.

The project manager shall present shall ensure the disclosure to buyers and/or renters regarding the findings of the analysis and inform occupants as to proper use of any installed air filtration and provide, free of charge, HEPA filters and any updates to ensure the residents have good air quality.

35 cont.

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**Fines to be imposed with each infraction and rise exponentially to fund damages to property and health.**

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**Sediment Testing - As stated in open forum, LACFCD shall release the sediment tests conducted in November 2015 (for the acceptance of the sediment at Vulcan Pits).**

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At the the LA County Flood Control IS/MND meeting the question of an MND report versus and Environmental Impact Report was asked. The reply was that they are both the same process. It was never made clear as to why an MND was done instead of an EIR. The MND seems to be missing a lot of information that may be discovered in an EIR.

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Thank you,

Christine Greene  
Mission Hills Resident



**Christine Greene (Greene)**

**February 25, 2016**

- Greene-1      Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. The Project would be performed in a maximum 8-hour day conducted within the hours of 9:00 AM to 5:30 PM, within the longer (14 hour) window allowed by City of Los Angeles standards, from Monday through Friday. Therefore, the construction crew will work approximately 40 hours per week. It is noted that the 2016 MND addressed a Monday through Saturday schedule. However, based on public comments received on the 2016 MND and in connection with redefining the haul routes, it was decided to reduce to work week by eliminating Saturday activities. Additionally, the LACFCD has performed a technical evaluation of alternative haul routes as well as a reduced schedule based on public comments, and the results are presented in the Recirculated MND.
- Greene-2      The CalEEMod data sheets referenced in the comment indicate application of Climate Zone 12, which represents the climate/meteorological conditions found in zip code 91352 (the zip code of the community of Sun Valley in the City of Los Angeles). Climate Zones in CalEEMod are selected in addition to the climate defaults and are looked up by zip code. Therefore, the climate data used is relevant to the Project area as well as being consistent with California Air Resource Board (CARB) methodology for CalEEMod. Regarding air monitoring stations, similar to application of the appropriate Climate Zone, while there are meteorological stations throughout southern California, SCAQMD-designated stations are those acceptable for use in CalEEMod.
- The CalEEMod model utilizes specially processed meteorological data that is prepared and verified by SCAQMD. The parameters applicable to the Project area (i.e., Los Angeles-South Coast) are defined by SCAQMD and are based on substantial evidence. As such, it is not possible, or advised, to use alternate setting data into the model. Further, the air modeling results are based on the worst-case meteorological conditions over a 5-year period, so the results likely overestimate what would occur in a typical construction day.
- Greene-3      The methodology used to measure to distances from the sensitive receptors is described in page 2-5 of the 2016 MND and page 3-10 of the Recirculated MND. The measurements are the shortest distance from the disturbance area on the Project site to the nearest structure (for residences and the church) and the nearest use area (for parks, as these have no structures). Disturbance refers to excavation, vehicle traffic, and other construction activity that would disturb the ground surface. It should be noted the nearest disturbance area is not necessarily the edge of the County-owned property. The Project would disturb most, but not all, of the site; there are areas around the perimeter of the spreading basins that would not be disturbed by Project implementation (page 3-10 of the Recirculated MND). Further, based on public feedback, the LACFCD would prohibit use of the perimeter road of the spreading grounds for truck loading. The distance is ascertained through measurement on aerial maps, such as Google Earth, and is considered accurate and adequate for purposes of modeling air and noise effects of a project.



Greene-4 Proper equipment maintenance would be required as part of the Contractor specifications and this specification is a standard operating procedure of the LACFCD.

Greene-5 Based on the results of the Revised Air Quality Report, the Recirculated MND includes feasible mitigation measures to reduce the significant impacts related to emissions of NO<sub>x</sub> (MM AQ-1) and fugitive dust (MM AQ-2). Based on the analysis, emissions of all other criteria pollutants were below SCAQMD thresholds. MM AQ-1 requires all off-road equipment greater than 50 horsepower operated on the Project site to meet Tier 4 Final emissions standards and is consistent with the County's standard operating procedures. However, based on public comments, the following contract special provisions have been defined for the proposed Project:

- Section 3-12.1.2 shall require all trucks used for transporting all excavated material to meet the United States Environmental Protection Agency's emission standards for model year 2013 or newer.
- Section 3-12.1.4 shall restrict idling to less than five minutes per Title 13, CCR, Section 2485. In addition, all trucks shall be prohibited from idling within 100 feet from any residential area and no idling at schools. Signs shall be posted at all Project site entrances/exits and loading areas.
- Per Section 3-12.2.2, the Contractor shall comply with SCAQMD Rule 402 and Rule 403 Large Operations, shall comply with SCAQMD Rule 403 requirements for wind gusts over 25 miles per hour (mph), all haul trucks shall be covered (no exceptions). Section 3-12.2.2 of the contract special provisions are stricter than Rule 403 and California Vehicle Code 23114. Details will be included in the Fugitive Dust Control Plan.

Based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM<sub>10</sub>; the requirements for this monitoring will be included in the Contractor specifications.

Greene-6 Contractor specifications would include required equipment types and maintenance standards and this specification is a standard operating procedure of the LACFCD.

Greene-7 As identified in Response Greene-5, above, Section 3-12.1.4 of contract special provisions shall restrict idling to less than five minutes per Title 13, CCR, Section 2485. In addition, all trucks shall be prohibited from idling within 100 feet from any residential area and no idling at schools. Signs shall be posted at all Project site entrances/exits and loading areas. These are measures above and beyond the mitigation measures identified in the Recirculated MND to further reduce air pollutants emissions via the contract specifications and are not required by CEQA and are voluntary on the part of the LACFCD, as the worst-case modeled emissions would be less than significant with implementation of MMs AQ-1 and AQ-2. If this comment is in reference to the modeled idling time of 7.5 minutes for each truck trip end in the air quality analysis, this is intended to capture engine activity at more than one location within the project site per one-way trip. This was one of the assumptions applied to generate highly conservative air and noise analyses. As stated on page 3-23 of the Recirculated MND, "...idling for 7.5 minutes is an overestimation, as the SCAQMD restricts idling to 5 minutes." This was meant to be a reasonable worst-case scenario for purposes of modeling only.

Limiting of any activity within 300 feet of residential property, assumed to mean the shared property line, and/or limiting idling to 2 minutes would be a prohibitive constraint on the Project based on the location of some of the basins and necessary excavation to improve the water conservation at the facility.

Greene-8 Based on public comments on the 2016 MND, additional detail has been added to RR AQ-1 in the Recirculated MND regarding anticipated contractor requirements to managing fugitive dust on the spreading grounds and associated with the haul trucks under Rule 403. The Contractor would be required to implement fugitive dust control consistent with SCAQMD Rule 403, including additional requirements for large operations (RR AQ-1). This would include preparation of a Fugitive Dust Control Plan. However, as per standard operating procedures for the County, the Rule 403-compliant Fugitive Dust Control Plan will be prepared by the selected contractor, which has not been decided yet. The Fugitive Dust Control Plan must be submitted for review and approval by the LACFCD before Project initiation.

In addition to a Fugitive Dust Control Plan, Contractor compliance with Rule 403 requirements would include, but not be limited to:

- A Dust Control Supervisor, who possesses a current certification from SCAQMD, would be designated. The Dust Control Supervisor would be responsible for preparing the Dust Control Plan.
- Signage, meeting the standards of the Rule 403 Implementation Handbook, would be installed around the Project site prior to initiating any sediment removal activities. The signage would provide an appropriate contact person(s) and phone number(s) to call with dust-related complaints and the phone number of the SCAQMD compliance office. The signage would remain and be maintained for the length of the Project.
- Daily inspections would be conducted by the Dust Control Supervisor, and specific dust control actions would be documented on the SCAQMD Inspections form from the Rule 403 Implementation Handbook.
- Watering exposed surfaces at least three times per day or more during windy conditions. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour.
- Fugitive dust would be controlled during after-hours through the implementation of Best Available Control Measures (BACM) identified in SCAQMD Rule 403 and the Fugitive Dust Control Plan. Non-toxic soil stabilizers/dust suppressants, resistant to wind erosion, that create a crust on the surface may be selected and applied consistent with Rule 403.
- Traffic speeds on unpaved roads would be restricted to no more than 15 miles per hour.
- One or more devices would be installed at ingress/egress points to remove dirt from vehicle tires and undercarriage prior to leaving the site.
- All materials to be loaded for export would be pre-watered.
- All haul trucks would be covered (with on board tarp).

Based on public comments on the Recirculated MND, the Contractor specifications for Rule 403 compliance shall state that all haul trucks will be covered with an on-

board tarp. The alternate means of limiting dust generation from trucks of maintaining two feet or more of freeboard will not be an option. The text of RR AQ-1 has been edited accordingly in Section 4.0, Clarifications, of this document.

- Greene-9 LACFCD anticipates the only power use necessary would be for the field office, a portable trailer or similar, tire wash stations, and scales. LACFCD is currently coordinating with LADWP on the best way to connect these temporary uses to existing power poles and lines serving the Project site. If connection to existing power lines is not feasible, these uses would be powered by generators. These generators would be placed at a distance of at least 30 feet from any sensitive receptors and would meet Tier 4 Final emissions standards to ensure there would be a less than significant impact from the use of this equipment. Sensitive receptors are identified in the Recirculated MND as being located as near as 30 feet from the proposed improvements. At this distance, noise generated from the operation of dozers, excavators, and haul trucks was determined to be attenuated (reduced) due to distance such that the noise level at the receptor was below the noise threshold. Generator operation is quieter than the above-referenced pieces of equipment; therefore, noise from operation of a generator placed at least 30 feet from the nearest receptor would not exceed the noise threshold. Regarding air quality, implementation of MM AQ-1 from the Recirculated MND requiring use of all Tier 4 off-road equipment would apply to the generators and ensure that its contribution of the daily maximum of emissions is within the SCAQMD thresholds.
- Greene-10 As discussed in Response Greene-8, above, consistent with SCAQMD Rule 403, traffic speeds on unpaved roads would be restricted to no more than 15 miles per hour.
- Greene-11 As discussed in Response Greene-8, above, the LACFCD would prepare a Fugitive Dust Plan consistent with all requirements of Rule 403. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour.
- Greene-12 As discussed in Response Greene-2, above, regarding air monitoring stations, while there are meteorological stations throughout Southern California, SCAQMD-designated stations are those acceptable for use in CalEEMod. The CalEEMod model utilizes specially-processed meteorological data that is prepared and verified by SCAQMD. The parameters applicable to the Project area (i.e., Los Angeles-South Coast) are defined by SCAQMD. The implication that accurate local wind speed and direction cannot be assessed for purposes of the CalEEMod modeling because the air monitoring station used in the analysis is not precisely reflective of the Project site, is unsubstantiated.
- Greene-13 It is unclear what the intent of this comment is. It is inferred that the comment addresses the total concentration of fugitive dust that should be emitted. SCAQMD Rule 403 requires that no visible dust is permitted beyond the Project's property line, where it can create a nuisance (SCAQMD Rule 402). As discussed in Response Greene-8, above, the Contractor would be required to implement fugitive dust control consistent with SCAQMD Rule 403, including additional requirements for large operations (RR AQ-1). Additionally, as discussed in Response Greene-8, above, the LACFCD will be implementing a range of emissions reduction measures consistent with SCAQMD Rule 403.

- Greene-14      The use of soil sifters was included in the equipment assumption of the air quality modeling and the Health Risk Assessment, and as such is reflected in the analysis results. It is noted the sifter is only needed to prepare the soil to be used as backfill at the headworks. As with all other activities, while most of the spreading grounds would be subject to disturbance, no vehicles or other activity would be permitted on the perimeter road. The location and use of all anticipated equipment would be consistent with SCAQMD Rule 403 to minimize fugitive dust generation, including the soil sifters.
- The LACFCD would prepare a Fugitive Dust Plan consistent with all requirements of Rule 403. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour (mph). As such, additional watering pursuant to High Wind conditions would be implemented when instantaneous wind speeds of 25 mph are experienced.
- Regarding wind breaks, mitigation (MM NOI-1) was required to build a sound wall to reduce a noise impact along the headworks prior to construction activity in this area (refer to pages 3-72 and 3-73 of the Recirculated MND). Based on public feedback, the LACFCD has opted to also install the sound wall along the private-facing perimeter (i.e., where the spreading basins abut private land uses). The sound wall would be at least eight feet high and would be installed prior to construction activities. The sound wall would also reduce transmission of any particles entrained in the air.
- Greene-15      As discussed in Response Greene-8, above, the use of chemical soil stabilizers may be among the fugitive dust control measures, to be selected and applied consistent with SCAQMD Rule 403.
- Greene-16      Please refer to Response Greene-14, above. All feasible measures consistent with SCAQMD Rule 403 would be implemented throughout the Project to reduce fugitive dust.
- Greene-17      As discussed in Response Greene-8, above, the Contractor would be required to implement a Fugitive Dust Control Plan consistent with SCAQMD Rule 403, which would include use of one or more devices installed at ingress/egress points to remove dirt from vehicle tires and undercarriage prior to leaving the site, pre-water all materials to be loaded for export, and require all haul trucks to be covered (with on board tarp).
- Greene-18      Please refer to Response Greene-14, above, regarding installation of an extended sound wall that would also reduce transmission of any particles entrained in the air. All feasible measures consistent with SCAQMD Rule 403 would be implemented throughout the Project to reduce fugitive dust.
- Greene-19      As disclosed in the 2016 MND and the Recirculated MND, all construction activity would be confined to, and reduced from, the hours and days prescribed by City of Los Angeles standards (refer to page 3-56 of the 2016 MND, and page 3-67 of the Recirculated MND). The LACFCD has voluntarily defined more restrictive hours – a maximum eight-hour work day conducted within the hours of 9:00 AM to 5:30 PM, Monday through Friday – than allowed under City standards.
- Greene-20      It is unclear what the intent of this comment is. It is inferred that the comment addresses the noise level limits for construction activity. While some construction

activity, such as with hand tools, can achieve a noise level of less than 60 dBA, most construction activities, including the proposed Project, would find this infeasible. Accordingly, noise limits for construction, if defined, are separate from operational noise levels. The Recirculated MND disclosed the estimated worst-case noise levels at the nearest sensitive receptors and determined there would be a significant noise impact during demolition activity at the headworks. As such, mitigation (MM NOI-1) was required to build a sound wall to reduce a noise impact along the headworks prior to construction activity in this area (refer to pages 3-72 and 3-73 of the Recirculated MND). As discussed in Responses Greene-14 and Greene-23, above, the LACFCD has opted to also install the sound wall along the private-facing perimeter of the spreading basins.

- Greene-21 Prior to start of construction, LACFCD will develop an outreach plan to notify nearby residents and interested stakeholders of construction activities. The outreach plan to be implemented may include community meeting, flyers, email, and website notifications. It is noted that the outreach plan is being implemented voluntarily and is not required as mitigation to reduce an environmental impact.
- Greene-22 The Contractor specifications would include equipment and process requirements to minimize noise to the extent feasible based on technology, cost, and schedule constraints. All feasible measures to manage noise generation, that still allow the Project to be completed in a timely fashion, would be implemented, and are discussed in Section 3.12, Noise, of the Recirculated MND. It is noted that adding additional specialized mufflers, silencers, or directional exhaust pipes may affect the performance of the emission control systems on the Tier 4 equipment and 2010 model year engines of the hauls trucks.
- Greene-23 Mitigation measure (MM NOI-1) requires that a sound wall be built to reduce a noise impact along the headworks prior to construction activity in this area (refer to pages 3-72 and 3-73 of the Recirculated MND). Based on public feedback, the LACFCD has opted to also install the sound wall along the private-facing perimeter (i.e., where the spreading basins abut private land uses). The sound wall would be at least eight feet high and would be installed prior to construction activities. It is noted the cited noise level standard (i.e., 45 dBA) applies to construction of new, permanent habitable structures and is not applicable as a threshold for noise levels within existing structures.
- Greene-24 The LACFCD will be performing noise monitoring; the requirements for this monitoring will be included in the Contractor specifications.
- Greene-25 Prediction of precise noise levels at each receptor is not considered feasible as the mix of equipment, equipment location, and background noise levels are constantly in flux on any construction site. Estimated construction noise levels, such as those described in the 2016 MND and the Recirculated MND, are based on a reasonable worst-case scenario of the planned activity and published data regarding construction equipment noise levels.
- Greene-26 Please refer to Responses Greene-19 through Greene-25, above. The Contractor specifications would include equipment and process requirements to minimize noise to the extent feasible based on technology, cost, and schedule constraints. All feasible measures to manage noise generation, that still allow the Project to be completed in a timely fashion, would be implemented. As described in the Recirculated MND, there would be less than significant impacts related to noise



with implementation of MM NOI-1, requiring a sound wall near the headworks, and no further noise-reduction mitigation is required. Nonetheless, the LACFCD is voluntarily extending the sound wall along the private-facing perimeter and will perform noise monitoring; the requirements for the sound wall and this monitoring will be included in the Contractor specifications.

- Greene-27 Please refer to Responses Greene-19 through Greene-26, above. Based on the Revised Noise Impact Analysis prepared for the Project (presented as Appendix E of the Recirculated MND), there would be a less than significant impact related to groundbourne vibration during Project implementation. Specifically, the most vibration-intensive activities would generate a vibration level of 0.061 inch per second peak particle velocity (ppv) at the nearest off-site receptor, approximately one-quarter of the level that vibration becomes perceptible (0.25 inches per second ppv). As such, no mitigation, such a vibration monitoring, is required to avoid or reduce a significant impact.
- Greene-28 Although the City of Los Angeles does not require traffic analysis for construction activities or for non-signalized intersections, the LACFCD voluntarily directed the preparation of a traffic study based on the City Department of Transportation's (LADOT's) traffic study guidelines applied to operation of new, permanent land uses and for all affected intersections (including non-signalized intersections). A complete description of the methodology used in the Revised Traffic Impact Study is provided in Chapter 8.0 (Traffic Impact Analysis Methodology) of the Revised Traffic Impact Study, provided in Appendix F of the Recirculated MND.
- Greene-29 A segment of the inbound Modified Haul Route A and the outbound Haul Route B travel on Arleta Avenue briefly before using Paxton Street. A new Haul Route C would transport sediment to and from Sunshine Canyon Landfill. This segment of the haul routes is south of the portion of San Jose Street referenced in the comment. As with all projects involving construction traffic, it is possible that some drivers will divert to different streets to avoid the construction vehicles. However, the three haul routes and associated sediment transport are dispersed to both the northwest and the southeast, and there is a myriad of surface streets throughout the paths of all three haul routes. As such, it is unlikely that any one street would have a change in a traffic patterns that would cause an adverse effect.
- Greene-30 The possibility of staggering haul truck trips to avoid AM and PM peak hours was assessed early in the Project development process. Due to the volume of soil to be exported and because the peak hours occur for four to five hours each day, it was determined that this would unduly limit the daily export from the site. However, the LACFCD has opted to push back the start of construction and hauling activities until 9:00 AM, with a maximum eight-hour work day, through 5:30 PM. If all peak hours were avoided, the length of the Project would be substantially extended, and the total cost of the Project would also be substantially greater. There are limits on the available funding, all of which is via public funds (i.e., State Proposition 84 Grant, LACFCD, and LADWP).
- Greene-31 The Revised Traffic Impact Study determined there would not be significant impacts at any study intersections during the peak hours, and thus school traffic would not be impacted during school commute periods such that LADOT criteria would be exceeded.

- Greene-32 The planned haul routes, which have been redefined based on public comments received, do not include side residential streets – interpreted to mean those streets serving traffic almost exclusively to and from individual residences.
- Greene-33 All construction parking and staging would occur on County-owned property, primarily near the headworks area of the Project site (refer to page 2-7 of the 2016 MND, and page 2-8 of the Recirculated MND). No off-site parking during construction activities would be permitted.
- Greene-34 A LACFCD construction inspector will be at the job site during construction activities and will enforce thresholds with regards to noise, dust, and air emissions. Additionally, as discussed in Response Greene-8, above, a Dust Control Supervisor, that possesses a current certification from SCAQMD, would be designated and responsible for preparing the Dust Control Plan. Implementation of the Project would include installation and maintenance of signage around the site that provides an appropriate contact person(s) and phone number(s) to call with dust-related complaints as well as the phone number of the SCAQMD compliance office. Based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM10 and noise monitoring; the requirements for this monitoring will be included in the Contractor specifications.
- Greene-35 The 2016 MND and the Recirculated MND included preparation of a Health Risk Assessment for emissions of fugitive dust (PM10 and PM2.5) and diesel particulates (see Section 3.3, Air Quality, of the 2016 MND and the Recirculated MND). This assessment has been updated based on the redefined haul routes and construction hours, and consistent with the findings of the 2016 MND, the Project would result in a less than significant cancer risk, non-cancer chronic health risk, and non-cancer acute health risk. It is noted the referenced “health risk analysis” parameters are not assessed individually but were based on dispersion modeling from the source of the emission. As such, the Health Risk Assessment (i.e., dispersion modeling) presented in the Recirculated MND was calculated consistent with the *Air Toxics Hot Spots Program Risk Assessment Guidelines*, prepared by the California Office of Environmental Health Hazard Assessment (OEHHA) in February 2015 is the appropriate screening mechanism. No further risk analysis is necessary. The modeled air quality is based on exterior conditions; interior air conditions can be better or worse (depending on interior sources of pollutants such as smoking) than exterior conditions. However, the interior air quality due to Project implementation would be the same or better than the exterior air quality such that air filters/HEPA filters would not be necessary.
- Greene-36 As noted in the MND, the LACFCD intends to make all feasible efforts to minimize the potentially significant adverse effects of the Project, including providing a line of communication with the Contractor and the LACFCD to register and address complaints. Implementation of the Project would not have a monetary infraction system, nor would it result in damaged property or affected health. Construction activities on a variety of scales are a common occurrence in dense urban areas, and the Project would not result in significant environmental impacts, as documented in the 2016 MND and the Recirculated MND.
- Greene-37 The results of the soil sampling and laboratory testing of soil samples collected in the spreading basins was posted online on the webpage maintained for the Project: <http://dpw.lacounty.gov/wrd/Projects/PacoimaSG/>, immediately after the 2016 public meeting. Further, this data was incorporated into Section 3.8, Hazards

and Hazardous Materials, of the Recirculated MND. As discussed, beginning on page 3-53 of the Recirculated MND, “No constituents were present in concentrations considered to be hazardous, as defined in federal and State regulations.”

- Greene-38 Under CEQA, an EIR is required when project impacts cannot be avoided or reduced to a less than significant level with project changes or mitigation measures (Section 15064[a][1] of the State CEQA Guidelines). Both an MND and an EIR must evaluate the same topics and would use the same thresholds, as discussed at the 2016 MND public meeting. However, an MND and an EIR have slightly different processes. As discussed in the 2016 MND and affirmed by the additional technical studies prepared based on the redefined haul routes and other Project revisions in the Recirculated MND, there would be no significant impacts after changes to the Project and/or implementation of mitigation measures. Therefore, an MND is the appropriate CEQA documentation for the Project. With an MND, a Lead Agency must ensure that all impacts are below the level of significance.

Re: Pacoima Spreading Grounds Improvement Project, Adaptation of a Mitigated Negative Declaration (MND)

Questions/comments I would like addressed at the public meeting January 28, 2016 at Laborer's Local 300 Union Hall, Mission Hills, California. Questions/requests are in red.

Hillen

- 
1. There is fencing proposed at two locations at the site. The proposed fence on the south side of Devonshire would be nice. However...leaving the opposite side of the street as rusted chain link fence and no sidewalk will just create a "nice area" versus "ghetto" contrast. **Can all the chain link fences fronting Devonshire and Arleta streets be replaced by the new "rolled iron" fence?**

1

Just a note – a sidewalk on the north side of Devonshire would be nice.

- 
2. Noise – The MND says noise will be within standards (note – not bearable, just within standards), except from the replacement of the intake canal.
    - a. The 8' wooden fence proposed for Paxton street would be ugly (of course, it's only plywood and it's temporary (sarcasm)). This is an 18 month project and during this period, I can just imagine a homeowner trying to sell or rent their home in this area. Constant trucks, constant noise, constant dirt storms and a cheap fence running along one side. The ability to sell or rent homes adjacent to the project will be nil during this 18 month period. Just a comment – mitigation methods should not be the cheapest alternative – **consider the effects on the adjacent housing.**

2

- 
3. It is pretty obvious that 180 to 240 trips a day by large, heavy trucks will have a number of effects – I do not agree with the MND that the effects will be negligible.

3

- a. Large diesel trucks are noisy, sooty and smelly and have been known to make the ground tremble in this area (Chevron used them when building oil wells in this area).

- 
- b. This area includes a handy on-ramp to the 5 freeway – which gets heavy use in the morning and evening rush hours. Cars fill Devonshire, Arleta and Paxton streets on their way to the on-ramp. We would now have dodge-em car where the cars would try to get around these slow-moving trucks to get to the freeway before them. **Will there be special traffic mitigation measures during this period – minimally at least for the rush hours?**

4

- 
- c. These heavy trucks will have a detrimental effect on the road pavements. There needs to be provision that after this project, the affected parts of Devonshire, Arleta and Paxton avenues will be re-paved. This might have to be extended to the 5 on-ramp. **Will there be a commitment to restore the roads to pre-project condition?**

5

- 
4. 7am is too early to start with the noise. This is a working class neighborhood and 7am is around the time mid-shift workers are returning home to sleep, and day workers are thinking about getting up to go to work. Let mid-shift get to sleep and day workers get to work before firing off the circus. Suggest between 8 and 9 am to get started. **Can we get the earliest start time moved to later than 7am?**
- 

6

- 
5. A surprising number of people in this area, including me, work from home. We will be subject to 100% of the traffic, noise, smell, shouts etc.. Consider this in the MND. (for example, when Chevron was building their oil wells, they rented a house across the street (Paxton) and used a loudspeaker to communicate with their workers – starting at 7am in the morning. This sort of behavior is unacceptable to the neighborhood).

7

- 
6. When the Devonshire/Arleta park was built, houses within several hundred feet were subjected to constant “dust storms” just from the landscaping. Originally, the dust was supposed to be mitigated by spraying water. When construction started, this usually didn’t happen because “we’re in a draught and need to conserve water.” We want to be sure this doesn’t happen again with this much bigger project that is going to go down 15 feet or so into the ground and not just on the surface. There will be a lot more dirt moved in this project. **Can we get a commitment to dust control measures in the MND?**

8

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Michael J. Hillen



**Michael J. Hillen (Hillen)**

**January 13, 2016**

- Hillen-1      Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. The addition of features requested by the community has been considered by the LACFCD and those determined to be feasible have been included in the Project: (1) a bike path along Pacoima Diversion Channel and (2) steel fencing along the public-facing perimeter of the spreading grounds, in addition to the perimeter segments discussed in the Recirculated MND. All features (e.g., fencing and bike path), added to the Project beyond the water conservation-related components, add to the total cost for the Project. There are limits on the available funding; all of which is via public funds (i.e., State Proposition 84 Grant, LACFCD, and LADWP). A multi-benefit project may be considered in the future to include public recreation and additional aesthetic enhancements. the LACFCD is looking forward to working with the community on future projects near the Pacoima Spreading Grounds facility.
- Hillen-2      The specifications for the noise barrier along the headworks area described in the 2016 MND are the minimum technical requirements (e.g., height, thickness, placement) to reduce the noise level to meet the standard and does not prescribe a particular aesthetic. Through this comment, the LACFCD and the Board of Supervisors will be made aware of concerns regarding views of the noise barrier. While it is acknowledged that some may find a view of a construction noise barrier adverse, the CEQA process pertains solely to the environmental effects of a project and does not assess socioeconomic effects as discussed in the comment. The presence of construction equipment and related features is addressed in Section 3.1, Aesthetics, of the Recirculated MND, which determined there would be a less than significant impact.
- Hillen-3      The potential for groundborne vibration or noise with implementation of the Project is addressed in the 2016 MND beginning on page 3-58, and in the Recirculated MND on page 3-70. As stated, the primary source of vibration would be the operation of bulldozers and hoe-rams, which were determined to result in less than significant vibration levels. This equipment was the focus of the analysis as they would generate the greatest levels of vibration among the planned activities, including the haul truck traffic. As such, haul truck traffic would also result in less than significant vibration levels. This finding has been affirmed based on the redefined haul routes and schedule as presented in the Recirculated MND.
- Hillen-4      As presented on page 3-83 of the Recirculated MND, pursuant to RR TRA-1, "The Los Angeles County Public Works requires the implementation of temporary traffic control measures in accordance with the *Standard Specifications for Public Works Construction* (Greenbook), which contains standards for traffic and access (i.e., maintenance of access, traffic control, and notification of emergency personnel). For construction activity within the street right-of-way, a traffic control plan would be prepared in accordance with the *Work Area Traffic Control Handbook* (WATCH Manual) and subject to approval prior to initiation of the right-of-way activities by the City of Los Angeles Department of Transportation."
- Hillen-5      The LACFCD will perform a pre- and post-Project evaluation of the pavement on the haul routes.

- Hillen-6 Based on public feedback and the results of the traffic analysis, the Project construction hours would be a maximum eight-hour work day conducted within the hours of 9:00 AM to 5:30 PM, Monday through Friday.
- Hillen-7 The 2016 MND and Recirculated MND analysis of all topical areas that are relative to sensitive receptors, such as traffic, noise, and air quality (including odors), is not based on temporal changes in the day-to-day population in the surrounding area, such as whether it is a daytime or nighttime population. Each topic has been assessed as though the receptor(s) are present at all times of the day. As such, the conclusions of the Recirculated MND reflect the assumption that sensitive receptors are present during the construction hours. A loudspeaker would not be used for on-site communications during Project implementation; to ensure this, the Contractor specifications would not permit this equipment.
- Hillen-8 As discussed in the 2016 MND (RR AQ-1 on page 3-10) and in the Recirculated MND (RR AQ-1 on page 3-13) and at the Community Meetings, the Project would implement all feasible dust control measures consistent with SCAQMD Rule 403. The Contractor would be required to implement fugitive dust control consistent with SCAQMD Rule 403, including additional requirements for large operations (RR AQ-1). This would include preparation of a Fugitive Dust Control Plan. However, as per standard operating procedures for the County, the Rule 403-compliant Fugitive Dust Control Plan will be prepared by the selected contractor, which has not been decided yet. The Fugitive Dust Control Plan must be submitted for review and approval by the LACFCD before Project initiation.

In addition to a Fugitive Dust Control Plan, Contractor compliance with Rule 403 requirements would include, but not be limited to:

- A Dust Control Supervisor, who possesses a current certification from SCAQMD, would be designated. The Dust Control Supervisor would be responsible for preparing the Dust Control Plan.
- Signage, meeting the standards of the Rule 403 Implementation Handbook, would be installed around the Project site prior to initiating any sediment removal activities. The signage would provide an appropriate contact person(s) and phone number(s) to call with dust-related complaints and the phone number of the SCAQMD compliance office. The signage would remain and be maintained for the length of the Project.
- Daily inspections would be conducted by the Dust Control Supervisor, and specific dust control actions would be documented on the SCAQMD Inspections form from the Rule 403 Implementation Handbook.
- Watering exposed surfaces at least three times per day or more during windy conditions. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour.
- Fugitive dust would be controlled during after-hours through the implementation of Best Available Control Measures (BACM) identified in SCAQMD Rule 403 and the Fugitive Dust Control Plan. Non-toxic soil stabilizers/dust suppressants, resistant to wind erosion, that create a crust on the surface may be selected and applied consistent with Rule 403.
- Traffic speeds on unpaved roads would be restricted to no more than 15 miles per hour.

- One or more devices would be installed at ingress/egress points to remove dirt from vehicle tires and undercarriage prior to leaving the site.
- All materials to be loaded for export would be pre-watered.
- All haul trucks would be covered (with on board tarp).

Based on public comments on the Recirculated MND, the Contractor specifications for Rule 403 compliance shall state that all haul trucks will be covered with an on-board tarp. The alternate means of limiting dust generation from trucks of maintaining two feet or more of freeboard will not be an option. The text of RR AQ-1 has been edited accordingly in Section 4.0, Clarifications, of this document.

Based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM10; the requirements for this monitoring will be included in the Contractor specifications.

It is acknowledged that not all construction sites properly or fully implement SCAQMD Rule 403; however, the LACFCD is committed to appropriately managing dust generation during the whole of the construction period including when the construction crew is not present. Fugitive dust would be controlled during after-hours through the implementation of Best Available Control Measures (BACM) identified in SCAQMD Rule 403 and the Fugitive Dust Control Plan. Implementation of the Project would include installation and maintenance of signage around the site that provides an appropriate contact person(s) and phone number(s) to call with dust-related complaints as well as the phone number of the SCAQMD compliance office.

**From:** Betty Ley  
**Sent:** Thursday, February 25, 2016 11:31 AM  
**To:** DPW-SpreadingGrounds  
**Subject:** Pacoima Spreading Grounds project

Greetings,

Ley

---

I have been a resident of Mission Hills (91345) and in the same home since 1952 as a child, now age 65.

I can not believe what this project entails and that it could put several 1000 of us at risk; health wise.

This project could take up to 480 trips a day. Are you folks crazy to put this type of project with all the dust etc throughout our community and put so many already with health problems i.e.seniors/children/babies at risk?

1

Very Unhappy,

---

Betty Ley

Mission Community Police Advisory Board Civilian Co-Chair  
SFV C-PAB Co-Chair Bureau  
Mission CPAB Outreach Committee Chair  
Mission CPAB Quality of Life Committee  
MCPC Officer Appreciation Day 2015 Chair planning Committee  
Editor: Mission CPAB newsletter  
Mission Security Council  
Mission Clergy Council  
Mission NC Presidents Quarterly Meetings  
Mission Hills Basic Car 19A43 Neighborhood Watch Co-Chair and Facilitator  
Editor: Mission Hills Basic Car 19A43 Neighborhood Watch Newsletter  
Mission Community Action Group "Kut the Kaboom"  
[www.lapdonline.org](http://www.lapdonline.org)

Remember to always "Lock it, Hide it, Keep it"

"There's a big difference between showing interest and really taking interest."— Michael P. Nichols

**Betty Ley (Ley)**

**February 25, 2016**

Ley-1      Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. The 2016 MND and the Recirculated MND included the preparation of a Health Risk Assessment for emissions of fugitive dust (PM10 and PM2.5) and diesel particulates (see Section 3.3, Air Quality, and Appendix A of the 2016 MND and the Recirculated MND). This assessment has been updated based on the redefined haul routes and construction hours, and consistent with the findings of the 2016 MND, the Project would result in a less than significant cancer risk, non-cancer chronic health risk, and non-cancer acute health risk.

**From:** Karen Lobell  
**Sent:** Wednesday, February 03, 2016 12:49 AM  
**To:** DPW-SpreadingGrounds  
**Subject:** To John Bodenchak - A Comment on Pacoima Spreading Grounds

Date: February 1, 2016

To: John Bodenchak

From: Cliff Lobell

RE: Pacoima Spreading Grounds

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**Lobell**

I was at the meeting on Thursday, January 28<sup>th</sup> and listened to what people were saying. I used to run a water truck. It was stated at the meeting that the ground will be wet down three times a day and no mention of weekends.

When you wet the ground and then dig a hole that hole is now dry dirt coming out once again and that same hole needs to be wet down each time fresh dirt comes out of the hole. Three times a day is not sufficient to keep the dust level down.

1

When the wind comes up after you have disturbed the top layer of dirt you will have dust blowing everywhere. Also, what will you do at night when no one is

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working and the wind is blowing to keep the dust under control and also at all time on the weekends??

1 cont.

These are big concerns especially for the people who live adjacent to these spreading grounds.

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Sincerely,

Cliff Lobell

**Cliff Lobell (Lobell)**

**February 1, 2016**

Lobell-1      Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. The Contractor would be required to implement fugitive dust control consistent with SCAQMD Rule 403, including additional requirements for large operations (RR AQ-1). This would include preparation of a Fugitive Dust Control Plan. However, as per standard operating procedures for the County, the Rule 403-compliant Fugitive Dust Control Plan will be prepared by the selected contractor, which has not been decided yet. The Fugitive Dust Control Plan will be submitted for review and approval by the LACFCD before Project initiation.

Based on public comments on the 2016 MND, additional detail has been added to RR AQ-1 in the Recirculated MND regarding anticipated contractor requirements to manage fugitive dust on the spreading grounds and associated with the haul trucks under Rule 403. In addition to a Fugitive Dust Control Plan, Contractor compliance with Rule 403 requirements would include, but not be limited to:

- A Dust Control Supervisor, who possesses a current certification from SCAQMD, would be designated. The Dust Control Supervisor would be responsible for preparing the Dust Control Plan.
- Signage, meeting the standards of the Rule 403 Implementation Handbook, would be installed around the Project site prior to initiating any sediment removal activities. The signage would provide an appropriate contact person(s) and phone number(s) to call with dust-related complaints and the phone number of the SCAQMD compliance office. The signage would remain and be maintained for the length of the Project.
- Daily inspections would be conducted by the Dust Control Supervisor, and specific dust control actions would be documented on the SCAQMD Inspections form from the Rule 403 Implementation Handbook.
- Watering exposed surfaces at least three times per day or more during windy conditions. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour.
- Fugitive dust would be controlled during after-hours through the implementation of Best Available Control Measures (BACM) identified in SCAQMD Rule 403 and the Fugitive Dust Control Plan. Non-toxic soil stabilizers/dust suppressants, resistant to wind erosion, that create a crust on the surface may be selected and applied consistent with Rule 403.
- Traffic speeds on unpaved roads would be restricted to no more than 15 miles per hour.
- One or more devices would be installed at ingress/egress points to remove dirt from vehicle tires and undercarriage prior to leaving the site.
- All materials to be loaded for export would be pre-watered.
- All haul trucks would be covered (with on board tarp).

Based on public comments on the Recirculated MND, the Contractor specifications for Rule 403 compliance shall state that all haul trucks will be covered with an on-board tarp. The alternate means of limiting dust generation from trucks of maintaining two feet or more of freeboard will not be an option. The text of RR AQ-1 has been edited accordingly in Section 4.0, Clarifications, of this document.

Based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM10; the requirements for this monitoring will be included in the Contractor specifications.

It is acknowledged that not all construction sites properly or fully implement SCAQMD Rule 403; however, the LACFCD is committed to appropriately managing dust generation during the whole of the construction period including when the construction crew is not present. Fugitive dust would be controlled during after-hours through the implementation of BACM identified in SCAQMD Rule 403 and the Fugitive Dust Control Plan. Implementation of the Project would include installation and maintenance of signage around the site that provides an appropriate contact person(s) and phone number(s) to call with dust-related complaints as well as the phone number of the SCAQMD compliance office.

John Bodenchak  
County of Los Angeles  
Department of Public Works  
Water Resources Division  
900 South Fremont Avenue  
Alhambra, CA 91803

February 23, 2016

Mr Bodenchak,

**Marx**

This is in response to Initial Study/Mitigated Negative Declaration (MND) Pacoima Spreading Grounds Improvement Project (PSG).

After reading through the IS/MND and appendices, there are clarifications needed in the data assumptions and modelling parameters used in the IS/MND. Proving significance rests on these models, and they are only as good as the data inputted.

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To begin, what is the project workweek schedule and timeline? As stated in the recorded LA County Flood Control IS/MND meeting on January 28, 2016, the proposed project's construction activities will take place five days a week for a total of 8 hours a day between the hours of 7 a.m. and 3 p.m. for 18 months. Please confirm or amend.

1

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The MND is already inconsistent with the daily and weekly operational hours for the project, alternating between 8 and 12 hours daily and 48 and 69 hours weekly depending on the model used. The 472 days inputted for grading in the CalEEMod (Appendices) becomes almost two years of grading with a 40-hour work week, for example.

2

Will the project go beyond the 18-months with the new 40-hour work week? The potential impact has not been adequately identified.

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### **Air Quality**

**Sensitive receptors.** How exactly was the distance measured to off-site receptors? What were the parameters? No documents were included to show how the measurements were taken, simply the measurements themselves (page 2 Appendix A).

3

Our building is 10 feet from the shared property line with the PSG. My neighbor's homes are 27 and 24 feet from their shared PSG property line. The West Basin is the closest basin to our homes. How is 40 feet the measured?

---

SCAQMD Rule 403 and 402 refer to property lines, not receptors, so an explanation of how the sensitive receptors were measured is key because the closer the dust or noise source is to the receptors, the greater the impact, exponentially.

4

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### **Modelling Parameters and Assumptions**

The only **onsite equipment** are two bulldozers, two excavators, one shaker/sifter, three water trucks and one street sweeper were modelled. There will be no loader? There will be not construction trucks (not haul trucks) on site? This is worst case? Only one area at a time to move 1.6 mcy of dirt?

5

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Will the contract bid limit the allowable equipment to only what was modeled in this MND?

6

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As a general comparison, the Tujunga Spreading Grounds Enhancement (TSGEP) project Draft EIR, excavating 1.3 mcy of dirt, modelled 4 simultaneous areas of work over a similar amount of time. Even not doing a direct comparison, the onsite equipment estimate seems low and not a worst case assumption

7

**The model parameter needs to reflect a more realistic possibility of a larger amount of construction equipment and the model should be re-run to check that there still will be no significant impact to air quality.**

---

**Use of 360/480 truck trips** [full Transportation response at end of letter] By using a 69 workweek to calculate the haul trips, the project has 29 more hours a week modeled than will be available.

The same amount of soil needs to be hauled. Will there be less moved a day? Will the project go longer? Will there be more construction equipment used to make up the difference?

8

By not adapting the numbers when in CalEEMod, you were at the very least inconsistent with your data, which shows poor practice, and at the very worst did not correctly account for the impact of the project. This was not a conservative approach.

---

For **haul truck emissions modelling**, how was the eighth of a mile of each haul trip calculated?

Haul truck trips onto the PSG would be 100 yards in, 20 yards to turn around and 100 yards out. That doesn't give the haul trucks much turn around space. Is this really a viable option?

Will this 1/8 mile only requirement be in the construction bid specs?

9

In the AERMOD model, haul trucks on the perimeter, at a greater distance than a 1/8 mile, was modeled as worst case. Then why was the same distance not used in CalEEMOD, if it is a worst case scenario?

**Re-run the CalEEMod model with the worst case specs.**

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For **truck idling** two point sources were used, one at the center portion of both sides of the spreading grounds. No point sources near sensitive receptors/residential areas were chosen nor was the worst case of half of 480 daily truck trips, but rather only 180 which is the least amount of haul trucks. Why was the least amount of haul trucks used in the model? That is not worst case, as the MND claims to do..

10

Under truck travel the paragraph before, "efforts will be made to limit truck travel on the perimeter road for truck loading" Limit, but not eliminate. If there will be truck travel on the perimeter road, it should be modeled and yet no point source near sensitive receptors, on the perimeter road, was used

11

**Because the fewest amount of haul trucks and no perimeter truck idling was modeled, please re-run the impact analysis as you have failed to prove the project would not expose sensitive receptors to substantial pollutant concentrations.**

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12

#### **CalEEMod Data Assumptions (Construction Impacts)**

CalEEMod was modeled on an 8-hour day, six days a week. The haul truck trips were not adjusted. Why was the model not run as a 12 hour day to match all the other models?

13

**An 8 hour day now shrinks the load time to approximately every two minutes. Does that still work with the construction equipment in the model? If not, the model must be re-run.**

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Land Use was user defined as Industrial. Please explain in detail why this was chosen as the project is an Open Space, not zoned industrial, and Open Space option is available.	14
Based on LACFCD statements made at community meetings, the 169 acres will not be worked on simultaneously, so why was 169 acres chosen as the land use, when SCAQMD suggests using maximum daily disturbed acreage in the model?	15
<p><b>Average Windspeed</b> 2.2 m/s (4.9 mph) Why was the default SQAQMD table for all of Los Angeles used? T(<a href="http://www.aqmd.gov/docs/default-source/caleemod/caleemod-appendixd.pdf?sfvrsn=2">http://www.aqmd.gov/docs/default-source/caleemod/caleemod-appendixd.pdf?sfvrsn=2</a>)</p> <p>Best practice would have been to find the average wind speed from a local source. The nearest, official weather source with yearly wind data readily available is an LA County property, Whiteman Airport. 1.5 miles away from the PSG. (<a href="https://weatherspark.com/history/31935/2015/Los-Angeles-California-United-States">https://weatherspark.com/history/31935/2015/Los-Angeles-California-United-States</a>)</p> <p><b>Currently, the 4.9 mph is an underestimation of the average wind speed in this area and the model should be re-run to reflect the average wind conditions at this project, and not an overall average of LA County to determine if local construction impacts are still less than significant.</b></p>	16
<p><b>775 acres for grading</b> is noted as the default. I could find no mention of 775 being a default number in CalEEMod. Please explain in detail on this number of acres graded was chosen.</p> <p>"To calculate the fugitive dust emissions associated with grading phases. Three distinct fugitive dust calculations are performed: dust from dozers moving dirt around, dust from graders or scrapers leveling the land, and loading or unloading the dirt into haul trucks." (<a href="http://www.aqmd.gov/docs/default-source/caleemod/usersguide.pdf?sfvrsn=2">http://www.aqmd.gov/docs/default-source/caleemod/usersguide.pdf?sfvrsn=2</a>)</p> <p>Where is the data in this CalEEMod for the activity assumptions for the <b>fugitive dust emission calculations</b>? That data is not listed in the CalEEMod in the appendices, including amount of soil to be removed, 1.6 myc yards, the amount per day, particulate size. (<a href="http://www.aqmd.gov/docs/default-source/caleemod/usersguide.pdf?sfvrsn=2">http://www.aqmd.gov/docs/default-source/caleemod/usersguide.pdf?sfvrsn=2</a>)</p> <p>RoadDust was listed, but no Fugitive Dust Source. If it was modeled, please share the data inputted and the model results..</p> <p>If this was not modeled, please explain in detail why not, as not accounting for the fugitive dust from the excavation activities, loading and shaking/sifting leaves a big hole in the model.</p> <p><b>For the inaccuracies listed above, the CalEEMod should be re-run because less than significant impact on air quality has not been proven as this model's results are flawed.</b></p>	17
<p><b>Rule 403</b> A full description of how Rule 403 will be implemented was not included on either the MND or in the Air Quality, Greenhouse Gas Emissions, and Health Risk Assessment Impact Analysis, Appendix A.</p> <p>There is no mention of covered haul trucks, earth moving material stabilization during activities and when inactive (specifically how they will mitigate the fugitive dust from the disturbed soil, disturbed surface area, stockpiles of bulk material awaiting screening or transport off-site, and inactive disturbed areas, and open storage piles) and where they will place the anemometers.</p> <p>Also, there is no mention of windy day plan with specific notation of sustained gusts of 25 mph. Please explain why all the above was listed and please rectify in the MND.</p>	18
<p>There is no mention of covered haul trucks, earth moving material stabilization during activities and when inactive (specifically how they will mitigate the fugitive dust from the disturbed soil, disturbed surface area, stockpiles of bulk material awaiting screening or transport off-site, and inactive disturbed areas, and open storage piles) and where they will place the anemometers.</p>	19



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**Further mitigation requested:**

Please use as a local wind speed measurement source as well as on site anemometer. Whiteman Airport has the data and is only 1.5 miles away, but it was not mentioned in the IS/MND..

(<https://weatherspark.com/history/31935/2015/Los-Angeles-California-United-States>)

20

The SCAQMD Burbank station is 12, not six miles away as stated in the MND and does not reflect the wind speeds in the PSG area.

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LA County Flood Control stated at the January 28, 2016 community meeting that there would be an onsite manager with his/her phone number posted. This is not specified directly in the MND, just a reference to 403. A further description should include: the county monitor must be on site at all time during the construction with the capability to monitor for noise, dust and emissions and is available to immediately deal with complaints arising from the project. Average and peak readings, sample times, locations and instrumentation shall be recorded in the construction logbook. When a complaint is made, all exposure parameters must be check at the complaints workstation and documented in the construction logbook .If exposure exceed the limits works must stop until the problem is found and fixed.

21

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Increased watering frequency would be required whenever wind speeds exceed 15 mph.

22

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HEPA filters for those homes near the PSG.

23

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Dust Barriers to be put in place when work is near (250 feet or less) of residences. A map of understanding can be used to determine when a dust barrier must be in place.

24

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For the health and well-being for those who share a property line with the PSG, please add no haul traffic and no idling of any construction equipment within 250 feet of residential properties.

25

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**Estimated Maximum Daily Construction Impacts Table 3-3**

Why was fugitive dust not included in the model as it is also considered a daily construction emission? Page 4.1-17 of the TSGEP Draft EIR has a line item for fugitive dust. Where is it measured in this model? On-site equipment numbers are do not reflect the fugitive dust (PM10, PM 2.5) numbers.

26

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**Screening of Maximum Localized Construction Emissions Table 3-4.**

Again, why is fugitive not in the table, as it adds to PM10 and PM2.5?

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**Appendix A, Table J- Screening of the Local Constructor Emissions at the Nearest Receptors**

(Appendix A) Includes onsite dirt roads with haul trucks, but still not fugitive dust.Why?

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**The Localized Construction Emissions** is already using a 5-acre model at a 82 feet. The stated nearest sensitive receptors are at 30 feet which means the impact of the dust will be four times worse than what is is available on the LST table. Why further divide it by 154 acres, rather than disperse it over the five acres? SCAQMD notes you can model the area worked, so dividing it by 154 acres is a choice, not a requirement. Why was the choice made?

27

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The fugitive dust emissions that would occur from the 1/8-mile of each haul truck trip segment of on-site dirt road travel, seems to be Is that the only fugitive dust source in the parameter, nothing modelled for moving 1.6 mcy of dirt? Is that correct? If yes, why only dust from the road and not from moving 1.6 mcy of dirt?

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**Under Health Risk Analysis Modelling Parameters 3-17**, the source treatment notes that "efforts would be made to limit the use of the perimeter road for truck loading." Based on CARB, it is illegal to queue within 100 feet of a residence. How could there be truck loading on the perimeter road as by its nature, queuing (more than one truck), is involved? And the perimeter road is far less than 100 feet from residences.

28

<p>The truck trips were modeled making a loop around either side of the spreading grounds as the worse case scenario which is a greater distance than the 1/8 of a mile modeled for construction impacts in the CalEEMod. Why the discrepancy? What is the worse case scenario?</p>	29
<p>The diesel truck idling was changed to point sources, at the central point of spreading basins. No haul trucks were modeled as idling on the perimeter road, even though the MND states “efforts would be made to limit the use of the perimeter road for truck loading,” which involves idling.</p>	
<p><b>The AERMOD should be re-run, with a point source on the perimeter road, to ensure the project would not expose sensitive receptors to substantial pollutant concentrations, or a mitigation must be added to the MND that no idling of any construction equipment, trucks or haul trucks with 250 ft of residential property.</b></p>	30
<p><b>Hydrology</b></p>	
<p>Will the project be extended out because more haul time was estimated than is available? If that is the case, will two wet seasons be impacted?</p>	31
<p><b>Noise</b></p>	
<p>“Construction activities at the spreading basins would consist of the use of bulldozers and excavators that would be constantly moving and would result in activities occurring near nearby sensitive receptor in less than one hour intervals; therefore, the one-hour construction noise threshold was utilized for the receptors next to the spreading basins (i.e., residential 90 dBA Leq for 1 hour during the daytime).”</p>	
<p>This statement eliminates mitigation for properties with an exterior construction noise level of 82db, above the 80db threshold, where mitigation should occur. Since it is already two times the amount over the threshold (db is not linear).</p>	32
<p>The presumption of less than an hour of noise at a time, over an 8 hour work day, when the work will take place in an area at a time, shows a less than conservative approach, opposite of what the MND claims to do.</p>	
<p>What standard or model was used to determine that “the sound would be constantly moving” is a valid reason to move the threshold? The sound has to stop for how long and go for what distance before it is considered an hour interval?</p>	
<p><b>Adjust the threshold back to 8-hour noise threshold and mitigate accordingly. Your statement failed to prove anything.</b></p>	
<p>It should be noted in the IS/MND, that SCAQMD Rule 402 requires keeping fugitive dust, noise and vibrations below any detectable level from sensitive receptors, i.e. property lines.</p>	33
<p><b>Further mitigation requested</b></p>	
<p>Additional noise control measure shall be implemented including: specialized mufflers or silencers, directional exhaust pipes, damping and sound absorptive material, and noise barrier for the Devonwood Park.</p>	34
<p><b>Transportation</b></p>	
<p>Where exactly are the haul trucks going to be entering and exiting on Devonshire? That was not specifically stated in the IS/MND.</p>	35
<p>Where will traffic from the construction crew be entering and exiting?</p>	36

Please explain why no upstream intersections were studied for impact, for example the Devonshire/Woodman intersection. Haul trucks will be turning onto Devonshire Street between the intersections of Arleta and Woodman and no model was done to see how this will impact traffic flow.	37
The traffic meters at the Paxton freeway entrance were not in place when this IS/MND was completed a year ago. They are there now. Does this change anything in the analysis?	38
In this IS/MND, the 360/480 max truck trips were used in most of the Air Quality models. The Project Trip Generation Table 3-16 explains how the 360/480 truck trips was calculated. Basically, how many daily truck trips would be required to move 1.37 million cubic yards of sediment in 1.5 years using a 69 hour work week. There was no mention of using scheduling software to calculate truck trips.	
But the project is a 40-hour a week project, with a 8-hour work day, so will the same amount of trucks trips occur in 8 hours?	39
<b>Traffic analysis divided the peak traffic by a 12-hour period. By reducing the amount of time the trucks will run, more trucks will be on the road at peak traffic time. The analysis needs to be reviewed to take into account the 8 hour day to ensure the traffic mitigation is still viable.</b>	
<b>Further mitigation requested</b>	
At school commute times limit use of Haul Route B so as not to affect Telfair and Sun Valley Schools	40
No construction traffic on side residential streets	41
Confirm all construction parking on site away from residential areas.	42
<b>Mandatory Finding of Significance</b>	
The combined inaccuracies listed above, this Initial Study/Mitigated Negative Declaration must be repaired and recirculated, better yet, it should go back for a full EIR. There were so many inconsistencies in this report it should not stand.	
By using flawed assumptions, underestimates and mixed data, this IS/MND fails to prove this project will have the less than significant impact to air, noise and traffic.	43
Thank you in advance for responding in kind, and for reviewing and implementing the mitigation requests.	
Because something is not required, does not mean it should not be done. The health and well-being of a community is the your hands.	

Thank you,

Elizabeth Marx

**Elizabeth Marx (EMarx)**

**February 23, 2016**

- EMarx-1 Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. Based on public comments received on the 2016 MND, the construction schedule for the Project was adjusted from 8-hour workdays conducted within the hours of 7:00 AM to 7:00 PM on Monday–Friday and 8:00 AM to 5:00 PM on Saturday over a period of approximately 18 months, to a maximum 8-hour workday conducted within the hours of 9:00 AM to 5:30 PM, Monday–Friday, with elimination of Saturday work, over a period of approximately 20 months. With this schedule adjustment, the Monday-Friday workday schedule is condensed (i.e. starting later and ending earlier) and would not involve weekend work. However, subsequent to circulation of the Recirculated MND, the LACFCD has determined that the anticipated construction period will be extended from approximately 20 months up to a maximum of 36 months. This extension is primarily as a result of limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.
- EMarx-2 Please refer to Response EMarx-1, above.
- EMarx-3 The methodology used to measure to distances from the sensitive receptors is described in page 2-5 of the 2016 MND and page 3-10 of the Recirculated MND. The measurements are the shortest distance from the disturbance area on the Project site to the nearest structure (for residences and the church) and the nearest use area (for parks, as these have no structures). Disturbance refers to excavation, vehicle traffic, and other construction activity that would disturb the ground surface. It should be noted the nearest disturbance area is not necessarily the edge of the County-owned property. The Project would disturb most, but not all, of the site; there are areas around the perimeter of the spreading basins that would not be disturbed by Project implementation (page 3-10 of the Recirculated MND). Further, based on public feedback, the LACFCD would prohibit use of the perimeter road of the spreading grounds for truck loading. The distance is ascertained through measurement on aerial maps, such as Google Earth, and is considered accurate and adequate for purposes of modeling air and noise effects of a project.
- EMarx-4 It is correct the SCAQMD Rule 403 refers to property lines; however, it is referring to the location at which visible dust is not permitted and can create a nuisance (SCAQMD Rule 402).
- EMarx-5 Air quality emissions were modeled for four different sources: on-site equipment, worker trips, demolition truck trips, and haul truck trips. The types and quantities of on-site construction equipment (i.e., one of the four sources) used in air quality modeling with CalEEMod for criteria pollutants is intended to represent a reasonable worst-case scenario of continuous activity (over eight hours) with a combination of equipment that could occur all at one time, to estimate the maximum daily emissions related to that one source. Vehicle trips (worker, demolition, and haul trucks trips) are modeled based on the actual number of trips



that would occur if construction activity were evenly divided over the course of the Project, or the same every day. This is, in turn, derived from the Revised Traffic Impact Study prepared for the Recirculated MND. The modeling parameters are not meant to be a specific day-to-day prescription for equipment. In reality, the combination of equipment and intensity of activity varies on construction sites on a daily level but would be within the parameters of the maximum emissions. Regarding loaders, excavators can serve to load the haul trucks.

EMarx-6 The Contractor specifications would prescribe construction equipment based on a minimum Tier, or efficiency of emissions, that must be used throughout the Project.

As discussed beginning on page 3-15 of the Recirculated MND, “The types and quantities of on-site construction equipment used in air quality modeling with CalEEMod for criteria pollutants is intended to represent a reasonable worst-case scenario of continuous activity (over eight hours) with a combination of equipment that could occur all at one time, to estimate the maximum daily emissions. It is noted that, while the total work day is eight hours, there would not generally be continuous activity with a combination of equipment for this period. Construction activities involving equipment emissions would occur in an intermittent fashion (i.e., with engines on and off) and in varying locations over the course of a work day. Vehicle trips are modeled based on the actual number of trips that would occur if construction activity were evenly divided over the course of the Project, or the same every day, and are based on the Revised TIA prepared for the Project and dated July 2017 (Appendix F). The modeling parameters are not a specific day-to-day prescription for equipment but represent the modeled scenario intended to capture the worst-case emissions. The combination of equipment and intensity of activity varies on construction sites on a daily level but would be within the parameters of the maximum emissions.” As discussed on page 3-16 of the Recirculated MND, “For the year 2018, the CalEEMod assumes that the on-site equipment will average at approximately a Tier 3 level; however, that may be achieved with a mix of Tier 0, 1, 2, 3, or 4 equipment. Tiers 0 through 4 refer to off-road diesel-engine equipment with specified levels (i.e., tiers) of emissions standards for PM10 and NOx adopted by CARB, with more stringent emissions standards adopted over time corresponding to a higher tier number. The CalEEMod model utilizes the worst-case engine Tier level allowed under CARB’s regulations for off-road diesel equipment.” This is, again, to model a reasonable worst-case scenario but not to prescribe the equipment.

Based on the CalEEMod methodology, the requirement for Tier 4 off-road equipment is presented as mitigation. Specifically, MM AQ-1 would require all off-road equipment greater than 50 horsepower operated on the Project site to meet Tier 4 Final emissions standards. The LACFCD would require Tier 4 off-road equipment as part of their standard specifications.

EMarx-7 Please refer to Responses EMarx-5 and EMarx-6, above. Please note that the vehicles are modeled in four different sources and is not only limited to what was listed in the on-site construction equipment. The estimate of construction equipment is based on the construction scenario specific to the Pacoima Spreading Grounds Improvement Project.

EMarx-8 Please refer to Response EMarx-1, above. The LACFCD has performed a technical evaluation of alternative haul routes and a 40-hour work week based on public comments received on the 2016 MND. This involved additional traffic

analysis; revised air quality, greenhouse gas, health risk assessment; and a revised noise analyses to determine the relative effects on these environmental issues compared to the haul routes addressed in the 2016 MND. The Recirculated MND determined the revised Project would result in less than significant impacts related to traffic, air quality, and noise with implementation of mitigation measures (please refer to Section 5.0, Mitigation Monitoring and Reporting Program, for a full description of all proposed mitigation measures).

- EMarx-9 The 1/8 mile refers to the portion of each haul truck trip that would occur on dirt roads, rather than paved roads. This detail was important to capture the greater amount of dust generated by driving on dirt roads than paved. Similar to the estimate of air emissions by construction equipment, the 1/8 mile of dirt road travel is meant to be a reasonable worst-case estimate, not a prescription. In evaluating the revised Project, it was determined that paving or placing barrier material over the central, unpaved, levee would be required to reduce fugitive dust emissions to a less than significant level. As such, there would be less than 1/8 mile, on average, travel on unpaved roads. The circulation of haul trucks and construction equipment was assessed by the LAFCD early in the Project development, and the proposed construction scenario is considered feasible. In light of this, re-running the CalEEMod model is not required.
- EMarx-10 Similar to the discussion for air quality modeling with CalEEMod, the Health Risk Assessment used dispersion modeling (with AEROMOD) based on situating point and line sources to represent a reasonable worst-case scenario and is not meant to be a literal description of each emissions source and each receptor. For the on-site truck idling point sources, these were centrally located in the two halves of the spreading basins to represent the averaged location of all idling emissions. For number of trucks idling, half of 360 (now 372) 18-cubic yard trucks were modeled as idling on the spreading basins all at one time for 7.5 minutes. The larger trucks have greater emissions per truck, and half the trucks were modeled as the other half would be on-road delivering soil to the pits. Also, idling for 7.5 minutes is an overestimation as the SCAQMD restricts idling to 5 minutes. Finally, Section 3-12.1.4 of the contract special provisions shall restrict idling to less than five minutes per Title 13, CCR, Section 2485. In addition, all trucks shall be prohibited from idling within 100 feet from any residential area and no idling at schools. Signs shall be posted at all Project site entrances/exits and loading areas. Therefore, a worse scenario was used in analyzing the potential impacts.
- EMarx-11 Based on public feedback, the LACFCD would prohibit use of the perimeter road of the spreading grounds for truck loading.
- EMarx-12 Please refer to Responses EMarx-10 and EMarx-11, above. In light of the discussion in the said responses, the impact analysis has adequately addressed the potential impact, or lack thereof, on sensitive receptors. Therefore, re-running the impact analysis is not deemed necessary.
- EMarx-13 Please refer to Responses EMarx-1, EMarx-5, and EMarx-6, above. In light of the discussion in the said responses, re-running the model is not deemed necessary.
- EMarx-14 The land use categories in CalEEMod represent the proposed action, rather than the existing land use at the location of a project. For the Project, the category of "User Defined Industrial" was selected as it is the most accurate representation of the Project's activity. Also, among the Industrial category of land uses in



CalEEMod, User Defined Industrial was selected as it provides the most flexibility in model parameters and ability to change defaults to accurately represent what is projected to occur onsite.

EMarx-15 The 169 acres represents the total number of acres that would be disturbed over the course of the Project for purposes of the air quality modeling. This is a conservative input as not all of the 169-acre site would be disturbed but results in a more conservative outcome (i.e., greater emissions) in the model.

EMarx-16 The CalEEMod data sheets referenced in the comment indicate application of Climate Zone 12, which represents the climate/meteorological conditions found in zip code 91352 (the zip code of the community of Sun Valley in the City of Los Angeles). Climate Zones in CalEEMod are selected in addition to the climate defaults and are looked up by zip code. Therefore, the climate data used is relevant to the Project area as well as being consistent with California Air Resource Board (CARB) methodology for CalEEMod. Regarding air monitoring stations, similar to application of the appropriate Climate Zone, while there are meteorological stations throughout southern California, SCAQMD-designated stations are those acceptable for use in CalEEMod.

The CalEEMod model utilizes specially processed meteorological data that is prepared and verified by SCAQMD. The parameters applicable to the Project area (i.e., Los Angeles-South Coast) are defined by SCAQMD and are based on substantial evidence. As such, it is not possible, or advised, to use alternate setting data into the model. Further, the air modeling results are based on the worst-case meteorological conditions over a 5-year period, so the results likely overestimate what occur in a typical construction day. Therefore, re-running the model is not deemed necessary, as the model correctly reflects the conditions at the Project site.

EMarx-17 CalEEMod calculates the acres disturbed for grading based on the Project-specific parameters input by the user. It is noted as a default in the CalEEMod data sheets as this is a number generated by CalEEMod and could be changed, if desired.

EMarx-18 Fugitive dust is the common term that refers collectively to PM10 and PM2.5 (particulate matter of two different sizes) and is a result of construction activity rather than a source. As discussed on page 3-15 of the Recirculated MND, "The SCAQMD has established methods to quantify air emissions associated with construction activities such as air pollutant emissions generated by operation of on-site construction equipment; fugitive dust emissions related to earthwork activities; and mobile (tailpipe) emissions from construction worker vehicles and haul/delivery truck trips. Fugitive dust is the common term that refers collectively to PM10 and PM2.5. Emissions vary from day to day, depending on the level of activity; the specific type of construction activity occurring; and, for fugitive dust, prevailing weather conditions." As discussed, beginning on page 3-15 of the Recirculated MND, "A construction-period mass emissions inventory was compiled based on an estimate of construction equipment as well as daily schedule and activity assumptions, as detailed below. The mass emissions SCAQMD thresholds are based on the rate of emissions (i.e., pounds of pollutants emitted per day). Air quality emissions were modeled for four different sources: on-site equipment, worker trips, demolition truck trips, and haul truck trips. The types and quantities of on-site construction equipment used in air quality modeling with CalEEMod for criteria pollutants is intended to represent a reasonable worst-case scenario of

continuous activity (over eight hours) with a combination of equipment that could occur all at one time, to estimate the maximum daily emissions. It is noted that, in reality, while the total work day is eight hours, there would not generally be continuous activity with a combination of equipment for this period. Construction activities involving equipment emissions would occur in an intermittent fashion (i.e., with engines on and off) and in varying locations over the course of a work day. Vehicle trips are modeled based on the actual number of trips that would occur if construction activity were evenly divided over the course of the Project, or the same every day, and are based on the Revised TIA prepared for the Project and dated July 2017 (Appendix F). The modeling parameters are not a specific day-to-day prescription for equipment but represent the modeled scenario intended to capture the worst-case emissions. The combination of equipment and intensity of activity varies on construction sites on a daily level but would be within the parameters of the maximum emissions.”

The reference to road dust is a source of dust and is specified as 1/8 mile unpaved (i.e., dirt) for each truck trip with the remainder (i.e., 97.8 percent as identified on the data sheets) as paved road. As such, the air quality modeling included fugitive dust emissions; the activity assumptions used in the CalEEMod are accurate; and the modeling does not have to be re-run.

EMarx-19 Regulatory requirements (RRs), such as RR AQ-1 that directs compliance with Rule 402 and 403, are based on local, State, and/or federal regulations or laws that are required independent of CEQA review, yet also serve to offset or prevent certain impacts. Because RRs are required to be part of a project’s design or implementation and are separate from the CEQA process, they do not constitute mitigation measures. Implementation of fugitive dust control, including coordination with SCAQMD, would be required of the Project regardless of the CEQA process, and is therefore not required to be defined to assess the impacts of a project. The list of specific dust control measures that a project, if approved, will enact to achieve appropriate dust control is generally determined subsequent to the CEQA process.

The Contractor would be required to implement fugitive dust control performed consistent with SCAQMD Rule 403, including additional requirements for large operations (RR AQ-1). This would include preparation of a Fugitive Dust Control Plan. However, as per standard operating procedures for the County, the Rule 403-compliant Fugitive Dust Control Plan will be prepared by the selected contractor. The Fugitive Dust Control Plan must be submitted for review and approval by the LACFCD before Project initiation.

Based on public comments on the 2016 MND, additional detail has been added to RR AQ-1 in the Recirculated MND regarding anticipated contractor requirements for management of fugitive dust on the spreading grounds and within the haul trucks under Rule 403. In addition to a Fugitive Dust Control Plan, Contractor compliance with Rule 403 requirements would include, but not be limited to:

- A Dust Control Supervisor, who possesses a current certification from SCAQMD, would be designated. The Dust Control Supervisor would be responsible for preparing the Dust Control Plan.
- Signage, meeting the standards of the Rule 403 Implementation Handbook, would be installed around the Project site prior to initiating any

sediment removal activities. The signage would provide an appropriate contact person(s) and phone number(s) to call with dust-related complaints and the phone number of the SCAQMD compliance office. The signage would remain and be maintained for the length of the Project.

- Daily inspections would be conducted by the Dust Control Supervisor, and specific dust control actions would be documented on the SCAQMD Inspections form from the Rule 403 Implementation Handbook.
- Watering exposed surfaces at least three times per day or more during windy conditions. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour.
- Fugitive dust would be controlled during after-hours through the implementation of Best Available Control Measures (BACM) identified in SCAQMD Rule 403 and the Fugitive Dust Control Plan. Non-toxic soil stabilizers/dust suppressants, resistant to wind erosion, that create a crust on the surface may be selected and applied consistent with Rule 403.
- Traffic speeds on unpaved roads would be restricted to no more than 15 miles per hour.
- One or more devices would be installed at ingress/egress points to remove dirt from vehicle tires and undercarriage prior to leaving the site.
- All materials to be loaded for export would be pre-watered.
- All haul trucks would be covered (with on board tarp).

Based on public comments on the Recirculated MND, the Contractor specifications for Rule 403 compliance shall state that all haul trucks will be covered with an on-board tarp. The alternate means of limiting dust generation from trucks of maintaining two feet or more of freeboard will not be an option. The text of RR AQ-1 has been edited accordingly in Section 4.0, Clarifications, of this document. Also, based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM10; the requirements for this monitoring will be included in the Contractor specifications.

- EMarx-20 Please refer to Response EMarx-16, above. Regarding the distance to the Burbank Station, it is unclear how a measurement of 12 miles was achieved. Using Google Earth, distances between six and nine miles were measured between the spreading basins and 228 West Palm Avenue. However, for purposes of measuring regional air quality and meteorological data, the Burbank Station is the nearest SCAQMD-designated station at the time the air quality modeling for the Project was prepared and as such a difference in the specified distance would not change the quantitative modeling results or otherwise require a change in the methodology applied in the air quality analysis.
- EMarx-21 Please refer to Response EMarx-19, above, regarding the commitment to provide an appropriate contact person(s) and phone number(s) to call with dust-related complaints as well as the phone number of the SCAQMD compliance office.
- EMarx-22 The LACFCD would prepare a Fugitive Dust Plan consistent with all requirements of Rule 403. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour (mph). As such, additional watering

pursuant to High Wind conditions would be implemented when instantaneous wind speeds of 25 mph are experienced.

- EMarx-23 Preparation of the 2016 MND involved the preparation of a Health Risk Assessment for emissions of fugitive dust (PM<sub>10</sub> and PM<sub>2.5</sub>) and diesel particulates (see Section 3.3, Air Quality, of the 2016 MND and the Recirculated MND). This assessment has been updated based on the redefined haul routes and construction hours. Consistent with the findings of the 2016 MND, the Project would result in a less than significant cancer risk, non-cancer chronic health risk, and non-cancer acute health risk. The modeled air quality is based on exterior conditions; interior air conditions can be better or worse (depending on interior sources of pollutants such as smoking) than exterior conditions. However, the interior air quality due to Project implementation would be the same or better than the exterior air quality such that air filters/HEPA filters would not be necessary.
- EMarx-24 With regard to dust barriers, mitigation (MM NOI-1) was required to build a sound wall to reduce a noise impact along the headworks prior to construction activity in this area (refer to pages 3-72 and 3-73 of the Recirculated MND). Based on public feedback, the LACFCD has opted to also install the sound wall along the private-facing perimeter (i.e., where the spreading basins abut private land uses). The sound wall would be at least eight feet high and would be installed prior to construction activities. The sound wall would also reduce transmission of any particles entrained in the air.
- EMarx-25 Limiting of any activity within 250 feet of residential property, assumed to mean the shared property line, would be a prohibitive constraint on the Project based on the location of some of the basins and necessary excavation to improve the water conservation at the facility. The LACFCD recognizes that proximity is an issue, and, as discussed in the Recirculated MND, would prohibit use of the perimeter road of the spreading grounds for truck loading. The Revised Air Quality, Greenhouse Gas, and Health Risk Assessment Report, updated to reflect the redefined haul routes and schedule, has determined that surrounding receptors would not be significantly impacted by Project implementation, based on the SCAQMD thresholds.
- EMarx-26 Please refer to Response EMarx-18, above.
- EMarx-27 The local air modeling was conducted according to the procedures detailed in Final Localized Significance Threshold Methodology, prepared by SCAQMD, dated July 2008. The Methodology states “It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.” As such, the use of the 25 meter or 82 feet distance follows the Methodology provided by SCAQMD. The placement of the emissions sources as six separate point sources around the perimeter of the Project site was chosen in order to provide a reasonable worst-case estimate of emissions created from the Project site.
- EMarx-28 As stated at the beginning of page 3-10 of the Recirculated MND, “Consistent with Title 13 of the *California Code of Regulations* Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, where the perimeter road is 100 feet or less from a home, there must not be any vehicle queuing activity with idling lasting more than five minutes.” Also, Section 3-12.1.4 of the contract special provisions shall restrict idling to less than five minutes per

Title 13, CCR, Section 2485. In addition, all trucks shall be prohibited from idling within 100 feet from any residential area and at schools. Signs shall be posted at all Project site entrances/exits and loading areas.

EMarx-29 Please refer to Response EMarx-9, above.

EMarx-30 Please refer to Responses EMarx-10 and EMarx-11, above.

EMarx-31 As disclosed on page 3-29 of the Recirculated MND, "Implementation of the Project would involve the Pacoima Spreading Grounds being off-line (i.e., not accepting water diverted from Pacoima Wash) for up to two complete wet seasons." The Project schedule was anticipated to be approximately 20 months. Subsequent to circulation of the Recirculated MND, and as discussed further in Section 4.0, the LACFCD has determined that the anticipated construction period will be extended from approximately 20 months up to a maximum of 36 months. This extension is primarily as a result of limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts (including related to hydrology and water quality) nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.

EMarx-32 The one-hour noise level refers to a steady state, or constant, equivalent noise level for that period of time. The inherent nature of the proposed activities in the spreading basins result in the construction equipment moving around, as well as stopping and starting, within a localized area (e.g., part of one basin) for a period of time, and then another, and eventually moving over the entirety of the spreading grounds, which are quite large. Therefore, the volume of construction noise would be highly variable over each hour and each day at each receptor. Whereas in the headworks area, construction activity would be confined to only the existing channel area, and all noise generation would emanate from within a narrow geographic area. Hence the more restrictive noise level standard was applied for this area of the Project site, rather than applying one standard for all areas.

It is noted that while it is true that A-weighted noise levels are measured on a logarithmic scale, a noise level of 82 dBA  $L_{eq}$  is not twice the applied threshold. Specifically, a doubling of a noise level of 80 dBA is 100 dBA; the 20-dBA difference represents an increase in sound energy (which creates the noise) of 100 times (i.e., 10 times 10). It is also noted that the modeled noise levels generally overestimate the actual noise levels that would be experienced and represent the highest noise level at the closest point to a receptor based on the expected construction scenario. As such, all noise levels further from a receptor would be less than the estimated noise level. Noise attenuates (lessens) at a rate of approximately 6 dBA per doubling of distance over a hard surface; the noise attenuation rate is greater over a soft surface such as soils. For the reasons discussed above, the thresholds applied are appropriate to the circumstances of the Project.

EMarx-33 SCAQMD Rule 402 does refer to "air contaminants or other material" being discharged such that injury, detriment, nuisance, or annoyance is caused. However, Rule 402 does not refer to generation of noise and vibration and does not specify that air emissions be kept below detectable levels. With regard to

fugitive dust, Rule 403 requires that “no person shall cause or allow the emissions of fugitive dust from any active operation, open storage pile, or disturbed surface area such that (A) the dust remains visible in the atmosphere beyond the property line of the emission source; or (B) the dust emission exceeds 20 percent opacity if the dust emission is the result of movement of a motorized vehicle.

- EMarx-34      The Contractor specifications would include equipment and process requirements to minimize noise to the extent feasible based on technology, cost, and schedule constraints. All feasible measures to manage noise generation, that still allow the Project to be completed in a timely fashion, would be implemented. Mitigation (MM NOI-1) was required to build a sound wall to reduce a noise impact along the headworks prior to construction activity in this area (refer to pages 3-72 and 3-73 of the Recirculated MND). Based on public feedback, the LACFCD has opted to also install the sound wall along the private-facing perimeter (i.e., where the spreading basins abut private land uses). This includes the segment of the site abutting Devonwood Park. The sound wall would be at least eight feet high and installed prior to construction activities.
- EMarx-35      The planned haul routes, including points of ingress and egress from the Project site, are detailed on pages 2-5 and 2-6, and illustrated on Exhibits 2-7 through 2-11 of the Recirculated MND. Additionally, page 2-8 of the Recirculated MND states “There are three gated access points on Arleta Avenue to the County-owned property—two into the headworks area and one into the spreading basins. There are also gated access points on the north and south sides of Devonshire Street. Construction workers would enter and exit the main parking area at the headworks via one or both of the gated access points on Arleta Avenue. There may be instances when construction crew and/or County staff access the spreading grounds directly and park within that portion of the site. In these instances, primary access would be either on Arleta Avenue or Devonshire Street. The spreading grounds access points on Devonshire Street would be used for haul trucks inbound and outbound from Sunshine Canyon Landfill and the Vulcan pits.”
- EMarx-36      Please refer to Response EMarx-35, above.
- EMarx-37      Please refer to Response EMarx-35, above.
- EMarx-38      The Revised TIA included manual vehicle classification counts of turning movements (i.e., traffic counts) were conducted at each of the 56 study intersections during the weekday morning (7:00 AM to 10:00 AM), mid-day (12:00 PM to 2:00 PM), and afternoon (3:00 PM to 6:00 PM) commuter periods to determine the peak-hour traffic volumes. The traffic counts were conducted at 14 study intersections in 2014, 10 study intersections in 2015, and 32 study intersections in 2016. The counts were timed to ensure schools were in session. All traffic counts have been increased by 1.5 percent annually to reflect assumed ambient growth for 2017 existing conditions. The presence of a meter at the Paxton Street freeway entrance would, if anything, improve the existing condition of that intersection. As such, there would be no change to the findings of the Revised TIA in the Recirculated MND.
- EMarx-39      The calculation of truck trips is derived via the traffic studies. For the currently proposed Project, with a 40-hour work week and 8-hour work day, the Project was anticipated to require approximately 20 months to complete. Specifically, as shown in the footnotes to Tables 3-22 and 3-23 in the Recirculated MND:



Based on coordination with the LACFCD, the following were assumed in the Recirculated MND:

- Total sediment to be exported = 1,370,000 cy, with 1 cy = 1.5 tons
- Up to 2,800 tpd would be exported to the Vulcan pits and up to 2,200 tpd would be exported to the Sunshine Canyon Landfill.
- Hours of Truck Hauling Operations: Mondays to Fridays, 9:00 AM to 5:30 PM (8 hours of hauling per day are assumed). Trip ends are one-way traffic movements, entering or leaving.

Based on these assumptions, daily truck trips are calculated as follows:

- Daily truck trips to/from the Vulcan pits were derived based on the following, using 14-cy capacity per haul truck: (2,800 tons per day) x (1 cy per 1.5 tons) = 1,867 cy per day / 14 cy per truck = 134 inbound trips + 134 outbound trips = 268 total daily truck trips.
- Daily truck trips to/from the Sunshine Canyon Landfill site were derived based on the following, using 14-cy capacity per haul truck: (2,200 tons per day) x (1 cy per 1.5 tons) = 1,467 cy per day / 14 cy per truck = 105 inbound trips + 105 outbound trips = 210 total daily truck trips.
- Daily truck trips to/from the Vulcan pits were derived based on the following, using 18-cy capacity per haul truck: (2,800 tons per day) x (1 cy per 1.5 tons) = 1,867 cy per day / 18 cy per truck = 104 inbound trips + 104 outbound trips = 208 total daily truck trips.
- Daily truck trips to/from the Sunshine Canyon Landfill site were derived based on the following, using 18-cy capacity per haul truck: (2,200 tons per day) x (1 cy per 1.5 tons) = 1,467 cy per day / 18 cy per truck = 82 inbound trips + 82 outbound trips = 164 total daily truck trips.

Subsequent to circulation of the Recirculated MND, and as discussed further in Section 4.0, the LACFCD has determined that the anticipated construction period will be extended from approximately 20 months up to a maximum of 36 months. Also, sediment export is estimated to result in a maximum of 476 trip ends (or 238 inbound and 238 outbound trips to the disposal facility and back), including 276 trip ends to and from the Cal-Mat pit and 200 trip ends to and from Sunshine Canyon Landfill. This extension is primarily as a result of limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.

EMarx-40 As school commute times are generally just before AM and PM peak hours, and the Traffic Impact Study determined there would not be significant impacts at any study intersections during the peak hours, it follows that school traffic would not be impacted during school commute periods such that LADOT criteria are exceeded.

EMarx-41 The planned haul routes, which have been redefined based on public comments received, do not include side residential streets – interpreted to mean those streets almost exclusively serving traffic to and from individual residences. For further detail, the planned haul routes are described on page 2-6 of the Recirculated MND.

Also, Modified Haul Route A and Haul Route B are depicted on Exhibits 2-7, Alternative 1: Concurrent Use of All Vulcan Pits; 2-8, Alternative 2: Use of Boulevard Pit; 2-9, Alternative 3: Use of Sheldon Pit; and 2-10, Alternative 4: Use of Cal-Mat Pit in the Recirculated MND. Haul Route C is depicted on Exhibit 2-11, Sunshine Canyon Landfill Haul Route.

EMarx-42 As discussed on page 2-8 of the Recirculated MND, all construction parking and staging would occur on County-owned property, primarily near the headworks area of the Project site.

EMarx-43 Under CEQA, an EIR is required when there would be impacts that would not be avoided or reduced to a less than significant level with project changes or with mitigation measures (Section 15064(a)(1) of the State CEQA Guidelines). The 2016 MND acknowledges the Project would result in increased air emissions and noise and quantifies these increases to compare to the quantitative thresholds for these environmental topics (i.e., air quality, noise). As discussed in the 2016 MND and affirmed by the additional technical studies prepared based on the redefined haul routes, there would be no significant impacts after changes to the Project and/or implementation of mitigation measures. Therefore, an MND is the appropriate CEQA documentation for the Project and includes sound assumptions and analyses supported by substantial evidence.

February 9, 2016

Mr. John Bodenchak  
County of Los Angeles  
Department of Public Works  
Alhambra, CA 91803

Re: Pacoima Spreading Grounds Improvement Project

Dear Mr. Bodenchak,

**PM**

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I am writing this MND on behalf of my daughter who lives with her four pets in a house adjoining a section of the Pacoima Spreading Grounds. She is therefore particularly vulnerable to elevated levels of particulate matter (PM) during the improvement project. I sincerely hope special measures will be taken to ensure PM concentrations remain within state and federal standards where there are occupied homes. This can best be done by having a mobile ambient-air monitoring station between active excavation sites and within one hundred feet of the nearest line of houses.

1

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Simply modeling the expected PM concentration will not do where the long term health of babies, young children, the elderly, and pets are at risk. Digging activity should be guided by state and federal PM standards. Either of two monitoring techniques can be used: Beta Attenuation or Gravimetric. Your focus should be on PM2.5. These finer particulates pose the greatest health risk because they can deposit deep within the lung — and the toxic effect is accumulative with a projected year-long excavation effort. The average PM concentrations should be REPORTED DAILY on some community bulletin board.

2

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The Spreading Grounds are an open site with the potential to emit dust influenced by the weather. Strong, warm, drying winds, most notably the Santa Anas would increase the rate that dust is lifted from an excavation site and emitted into the air. They also can be expected to spread that dust over a large area. Some provision should be made to suspend excavation work and “tarp” any large mounds of loose dirt when these winds are predicted.

3

It also should not be too much to ask that haul truck loads be tarped, too.

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I am sure you will agree that the health of citizens living in close proximity to the spreading grounds is paramount and supersedes any benefit to be gained by the proposed improvement project.

Sincerely,  
*Paul C. Marx*  
Paul C. Marx, Ph.D.

**Paul Marx, PhD (PMarx)**

**February 9, 2016**

PMarx-1 Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. Fugitive dust concentrations have been analyzed with respect to regional emissions, local emissions, and health risk in both the 2016 MND and the Recirculated MND. As described in regulatory requirement (RR) AQ-1 in the Section 3.3, Air Quality, of the Recirculated MND, fugitive dust control would be performed consistent with the South Coast Air Quality Management District (SCAQMD) rules and permitting requirements. Specifically, the Contractor would be required to comply with the Rule 403, including additional regulations for large operations. This would include preparation of a Fugitive Dust Control Plan. Per standard operating procedures for the County, the Rule 403-compliant Fugitive Dust Control Plan will be prepared by the selected contractor. The Fugitive Dust Control Plan must be submitted for review and approval by the LACFCD before Project initiation.

Based on public comments on the 2016 MND, additional detail has been added to RR AQ-1 in the Recirculated MND regarding anticipated contractor requirements to management fugitive dust on the spreading grounds and within the haul trucks under Rule 403. In addition to a Fugitive Dust Control Plan, Contractor compliance with Rule 403 requirements would include, but not be limited to:

- A Dust Control Supervisor, who possesses a current certification from SCAQMD, would be designated. The Dust Control Supervisor would be responsible for preparing the Dust Control Plan.
- Signage, meeting the standards of the Rule 403 Implementation Handbook, would be installed around the Project site prior to initiating any sediment removal activities. The signage would provide an appropriate contact person(s) and phone number(s) to call with dust-related complaints and the phone number of the SCAQMD compliance office. The signage would remain and be maintained for the length of the Project.
- Daily inspections would be conducted by the Dust Control Supervisor, and specific dust control actions would be documented on the SCAQMD Inspections form from the Rule 403 Implementation Handbook.
- Watering exposed surfaces at least three times per day or more during windy conditions. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour.
- Fugitive dust would be controlled during after-hours through the implementation of Best Available Control Measures (BACM) identified in SCAQMD Rule 403 and the Fugitive Dust Control Plan. Non-toxic soil stabilizers/dust suppressants, resistant to wind erosion, that create a crust on the surface may be selected and applied consistent with Rule 403.
- Traffic speeds on unpaved roads would be restricted to no more than 15 miles per hour.
- One or more devices would be installed at ingress/egress points to remove dirt from vehicle tires and undercarriage prior to leaving the site.

- All materials to be loaded for export would be pre-watered.
- All haul trucks would be covered (with on board tarp).

Based on public comments on the Recirculated MND, the Contractor specifications for Rule 403 compliance shall state that all haul trucks will be covered with an on-board tarp. The alternate means of limiting dust generation from trucks of maintaining two feet or more of freeboard will not be an option. The text of RR AQ-1 has been edited accordingly in Section 4.0, Clarifications, of this document.

Based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM10; the requirements for this monitoring will be included in the Contractor specifications.

As discussed on page 3-22 in Section 3.3, Air Quality, of the Recirculated MND, “Ambient air quality standards were set to protect public health, including the health of sensitive individuals (elderly, children, and the sick). Therefore, when the concentrations of those pollutants exceed the standard, it is likely that some sensitive individuals in the population would experience health effects.” The Revised Air Quality Report determined that even with compliance with Rule 403, based on the evaluation of the revised Project schedule and haul routes, a new significant impact related to local (but not regional) emissions of particulate matter with a diameter of 10 microns or less (PM10) – a class of fugitive dust – was identified. Therefore, the Recirculated MND includes two new mitigation measures (MMs) to reduce criteria pollutant emissions to a less than significant level, as presented below.

MM AQ-1 requires all off-road equipment greater than 50 horsepower operated on the Project site to meet Tier 4 Final emissions standards. While this is required to reduce regional emissions of nitrous oxides (NOx) to a less than significant level, it also serves to reduce PM10. MM AQ-2 requires that the tops of the central levees, which run in a northeast-southwest direction, are paved or surfaced with a Roadway Mat System that is no less effective than a paved road at controlling fugitive dust emissions. The pavement and/or mat system must be installed prior to the start of hauling activities. With implementation of MMs AQ-1 and AQ-2, dispersion modeling (i.e., health risk assessment) results included in the Recirculated MND show that local emissions of PM10 would be reduced to below the SCAQMD threshold, and therefore be less than significant with mitigation. Therefore, all feasible measures would be implemented to ensure all criteria air pollutant emissions are under SCAQMD thresholds. Because air quality emissions and health risk would be less than significant with implementation of MMs AQ-1 and AQ-2, ambient air monitoring stations on the site during construction activity would not be required. However, all complaints made to the on-site contact, whose information will be placed on signage along the Project site, will be investigated. Further, based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM10; the requirements for this monitoring will be included in the Contractor specifications.

**PMarx-2** In addition to estimating the worst-case regional and local emissions of all criteria air pollutants, including fugitive dust, the 2016 MND and Recirculated MND included a health risk assessment (HRA) to determine the impact of both PM10 as fugitive dust and diesel PM10, a toxic air contaminant (TAC), during construction.

With regard to “accumulative” effects of fugitive dust emissions, the air quality analysis determined the Project would not exceed the SCAQMD regional significance thresholds for VOC and NOx (ozone precursors), PM10, and PM2.5 with implementation of MM AQ-1 (to reduce regional NOx emissions below the level of significance and contribute to reducing local fugitive dust emissions) and MM AQ-2 (to reduce local fugitive dust emissions below the level of significance). Therefore, construction of the Project would result in a less than significant cumulative health impact with mitigation. As noted in Response PMarx-1, above, on-site air monitoring is not required, and as such and in light of the above discussion, daily posting of PM concentrations would not be necessary.

PMarx-3      Please refer to Response PMarx-1, above.



9 February 2016

TO: John Bodenchak  
Dept of Public Works  
Water Resources Div.  
900 So Fremont Ave  
Alhambra, CA 91803

Dear Mr Bodenchak,

VM

I'm writing to you as a concerned parent of a daughter who lives in Mission Hills, "on the other side of the fence" from the planned 'dig': The Pacoima Spreading Grounds.

The plan sounds so simple -- remove the top layer of soil. BUT is it SIMPLE? Has anyone from the planning section actually visited the area? Has anyone tested this "soil"? After many years it must have collected an astonishing amount of pollution --toxins from exhausts, spraying, industrial waste -- tiny particles lying in wait to be disturbed and tossed into the air -- and eventually find they way into the lungs of unsuspecting victims.

1

A plan this big becomes like a runaway train -- almost impossible to stop, but we must make an effort to use the brakes.

2

There are questions that need answers.

Distance between 'dig' and homes -- is this an estimate? An accurate measure? ADEQUATE?

3

Rules for idling trucks -- loading -- hauling -- are these wishful? Accurate? Firm? again, are they ADEQUATE?

4

Alternative plans for less than ideal weather?

5

When the Santa Ana winds come shrieking in, raising everything --does work slow? STOP?

6

And on days when the inversion layer moves over the Basin like a damp blanket, holding every speck of deadly dust just waiting for the next victim to take a breath, does work slow? STOP?

7

We need answers, not platitudes.

As I see it, profits for companies producing drugs to fight COPD, cancer and other related problems look promising.

8

I just do not want my daughter -- and her neighbors -- to have that sort of future!

Thank you,



(Mrs) Vera Marx

**Vera Marx (VMarx)**

**February 9, 2016**

VMarx-1 Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. As discussed on page 3-54 in Section 3.8, Hazards and Hazardous Materials, of the Recirculated MND, “The Pacoima Spreading Grounds, south of the headworks, receives surface water and debris from a large subwatershed area in the San Gabriel Mountains and the San Fernando Valley urban areas. Because of this, there is potential for pollutants common in urban areas (e.g., oils, metals, and pesticides) to enter the facility in runoff and collect in the sediment. However, the spreading grounds operated by LACFCD bypass what is referred to as the “first flush” of storm water runoff, generally about the first ¾-inch of rain, that contains the majority of pollutants that runoff can collect. Regardless, prior to sediment being accepted at the Vulcan-owned pits and Sunshine Canyon Landfill, soil samples must be collected, and laboratory tested to confirm it is not a hazardous material.

Accordingly, subsequent to preparation of the 2016 IS/MND, soil sampling and testing was performed within the spreading grounds. The results of the soil sampling and laboratory testing of soil samples collected in the spreading basins were posted online on the webpage maintained for the Project. A total of 24 borings were advanced to depths of 20 to 30 feet below ground surface (bgs) within the 12 existing basins. The analytes included: polynuclear aromatic hydrocarbons, volatile organic compounds and BTEX, semi-volatile organic compounds, organochlorine pesticides, dioxin, polychlorinated biphenyls, and Title 22 metals. Because of the number of analytes and number of borings, the tabular results are extensive; the boring locations and all test results are presented in Appendix D-3 [of the Recirculated MND]. No constituents were present in concentrations considered to be hazardous, as defined in federal and State regulations. Therefore, excavation of the sediments in the spreading basins would not release hazardous materials that would adversely affect either construction workers or the surrounding community.

VMarx-2 This comment is acknowledged.

VMarx-3 The methodology used to measure the distances from the sensitive receptors is described in page 2-5 of the 2016 MND and page 3-10 of the Recirculated MND. The measurements are the shortest distance from the disturbance area on the Project site to the nearest structure (for residences and the church) and the nearest use area (for parks, as these have no structures). Disturbance refers to excavation, vehicle traffic, and other construction activity that would disturb the ground surface. It should be noted the nearest disturbance area is not necessarily the edge of the County-owned property. The Project would disturb most, but not all, of the site; there are areas around the perimeter of the spreading basins that would not be disturbed by Project implementation (page 3-10 of the Recirculated MND). Further, based on public feedback, the LACFCD would prohibit use of the perimeter road of the spreading grounds for truck loading. The distance is ascertained through measurement on aerial maps, such as Google Earth, and is considered accurate and adequate for purposes of modeling air and noise effects of a project.

- VMarx-4 As discussed on pages 3-10 and 3-11 of the Recirculated MND, “Consistent with Title 13 of the *California Code of Regulations* Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, where the perimeter road is 100 feet or less from a home, there must not be any vehicle queuing activity with idling lasting more than five minutes.” As indicated by the total of the regulatory section, the purpose of the State’s idling limit of five minutes is to protect health. Compliance with this regulation is considered adequate.
- VMarx-5 As is the case with construction projects of all kinds, there are contingencies in place for inclement weather, whether that be rain, high winds, intense heat, or other conditions. The precise details of these contingencies would be determined as part of the contracting process and would also be decided on a case-by-case basis, to protect the construction workers and the surrounding community.
- VMarx-6 Please refer to Response VMarx-5, above. Also, SCAQMD Rule 403 includes several requirements for high wind conditions, which are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour. Specifically, the Contractor would be required to comply with the Rule 403, including additional requirements for large operations. This would include preparation of a Fugitive Dust Control Plan. Per standard operating procedures for the County, the Rule 403-compliant Fugitive Dust Control Plan will be prepared by the selected contractor. The Fugitive Dust Control Plan must be submitted for review and approval by the LACFCD before Project initiation.
- VMarx-7 Please refer to Response VMarx-5, above.
- VMarx-8 This comment is acknowledged.

John Bodenchak  
County of Los Angeles  
Department of Public Works  
Water Resources Division  
900 South Fremont Avenue  
Alhambra, CA 91803

February 25, 2016

Mr Bodenchak,

**Milne**

This is in response to Initial Study/Mitigated Negative Declaration (MND) Pacoima Spreading Grounds Improvement Project (PSG).

After reading through the IS/MND and appendices, there are corrections, missing statements, and statements that should be amended. There are also clarifications needed in the data assumptions and more consistency in the modelling parameters used in the MND. Proving significance rests on these models, and they are only as good as the data inputted.

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The project will not be started until Spring 2017. This MND was configured based on a Spring 2016 start date. The assumptions made should reflect the actual requirement for when the work will actually be done and this MND should be redone with the requirements for 2017 incorporated.

1

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The total project hours was incorrectly calculated (page 3-72) because the PSG will have a 40 hour work week, not a 69 hour work week. This means this project will not be able to remove 1,370,000 cubic yards of sediment in 18 months working 40 hours a week using 180-240 haul trucks and one of four alternatives is needed to fix this mistake:

Alternative 1: the project will not be completed in 18 months

Alternative 2: the work week will be 69 hours

Alternative 3: the work area will be expanded to several work sites

Alternative 4: the scope of the work will be reduced to what can be accomplished in 3000 total work hours.

If the project will not be completed in 18 months. The underestimation will mean the project will need an addition 12-13 months. This means the PSG would be inactive for over 2 years. All modeling for air quality, noise, traffic and thus this MND would need to be redone reflecting the new timeline and the MND would not have proven that the project would have a less than significant impact on air quality, noise or traffic. If the project work week would be extended to 69 hours per week (12-hour days Monday through Friday and 9-hour day on Saturday) then the modeling for air quality, construction equipment emissions, and all other CalEEMod and AERMOD modeled on 8-hour days would need to be redone and thus this MND has not proven that the project would have less than significant impact on air quality, health, noise or traffic.

2

If the project stays at 18 months and 40 hours/ week then the number of daily truck trips would need to be increased by 58%. Thus the daily number of 14 cubic yard haul truck trips would be 396 and the daily number of 18 cubic yard haul trucks would be 312. The worst case scenario is 396 or 312 daily truck trips.

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All air quality haul truck emissions and traffic studies are based on incorrect parameters and therefore this MND failed to prove that the project would have less than significant impact.

The only other option would be that the project would not be able to be completed. Only 840,000 cubic yards of sediment would be able to be removed working for 18 months, 40 hours a week with 15-20 peak hours haul truck trips.

2 cont.

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In addition to redoing all the modeling that used the 18 month parameter or the 8-hour day and/or 40 hour week parameter or used the 240 daily truck trip parameter, the modeling should be redone and this MND extensively amended with the updated model analysis or as this is potentially a long reaching effect, require a full EIR.

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3

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#### page 2-5 , 2.4.1 SENSITIVE RECEPTORS

Please clarify how these distances from the PSG and sensitive receptors were calculated. Please clarify why property lines were not used, if they were not, as that is the measurement of distance used in the SCAQMD Rule 403 and SCAQMD Rule 402. Please clarify, if property lines were not used for modeling, but was for mitigation per the SCAQMD Rule 403. Please clarify if the perimeter road was included or excluded in the measured distance.

4

The measurements used to describe the distances from sensitive receptors to the PSG, should be consistent. If the haul trucks, construction trucks, and construction equipment both fixed and mobile will be using the perimeter road, then the road should be included in the project work site. The perimeter road is less than 10 feet away from most of the residential property lines.

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#### page 2-7, 2.4.2 CONSTRUCTION SCENARIO

In the Construction Scenario ( section 2.4.2), the MND states that the PSG project hours will be for 8 hours a day , 6 days a week , for 18 months beginning Spring 2017.

In the recorded LA County Flood Control IS/MND meeting on January 28, 2016, the project manager, John Bodenchak, stated that the PSG project work hours would be specifically 7:00 AM to 3:00 PM, Monday through Friday only. This statement of a 40 hour work week is a promise to the community and as such should become part of the contract with the construction company and the MND should be amended to reflect this.

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5

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#### 3.3 Air Quality

Note this document references a section, Sensitive Receptors, which are detailed above in Section 2.4.1, Project Components and the objections are detailed in that section.

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6

Referencing Regulatory Requirements, "All construction activities shall be conducted in compliance with all applicable South Coast Air Quality Management District (SCAQMD) rules and permitting requirements, including SCAQMD Rule 403 and SCAQMD Rule 402."

7

There needs to be a more detailed plan for SCAQMD Rule 403 and SCAQMD Rule 402 mitigation then what is included in Appendix A; Air Quality, Greenhouse Gas Emissions, and Health Risk Assessment Impact Analysis (Air Quality Report) dated August 2015 and prepared by Vista Environmental (Vista 2015a). PSG is

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a project of over 50 acres and as stated, will likely qualify as a large operation. As a large operation they are required to do more mitigation, maintain daily records to document specific dust control issues, and monitor wind speeds with on-site anemometers. This MND does not specifically address the issues and mitigation measures to be implemented to deal with fugitive dust issues arising from:

- wind gusts that exceeds 25 mph
- open storage piles
- backfill material (approximately 290,000 cubic yards) both when stockpiled and when actively handling the material
- the planned operation of sifting 1,600,000 cubic yards of material on site
- disturbed soil and earth moving material stabilization during activities and when inactive (specifically how they will mitigate the fugitive dust from the disturbed soil, disturbed surface area, stockpiles of bulk material awaiting screening or transport off-site, and inactive disturbed areas, and open storage piles)

7 cont.

This MND does not adequately outline the SCAQMD Rule 403 mitigation measures that would be required to fulfill the requirements.

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Excavating, sifting on-site, stockpiling or using as backfill or loading into haul trucks 1.6 million cubic yards of sediment will be a nuisance to and endanger the comfort, health and safety of the sensitive receptors who share a property line with the PSG and the sensitive receptors who live within 200 feet of the PSG. There is no specific mitigation for fugitive dust outlined in the MND or the Appendix for SCAQMD Rule 402, Nuisance, in regards to air quality without mitigation.

8

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We would like the following to be included as SCAQMD Rule 403 and SCAQMD Rule 402 mitigation:

- requiring all off-road diesel-powered construction equipment greater than 50 hp to meet the Tier 4 emissions standards
- requiring that all construction equipment be outfitted with BACT devices certified by CARB.
- requiring the Construction Contractor to supply a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit at the time of mobilization of each applicable unit of equipment.
- requiring the contractor to maintain and operate construction equipment to minimize exhaust emissions
- Limiting truck idling to 5 minutes, off- and on-site
- Not permitting the use of the perimeter road by any truck, vehicle or construction equipment. As this road runs less than 25 feet from the property line shared by the PSG and sensitive receptors, this would keep any construction equipment or haul truck from idling within 250 feet of residences from sensitive receptors and will also keep road dust at a minimum
- Using street sweepers that comply with SCAQMD Rules 1186 and 1186.1
- Requiring that, where possible, construction equipment will obtain power from the power poles rather than the use of temporary diesel or gasoline powered generators.,
- Having a High Wind Fugitive Dust Control Plan prepared and implement when wind speeds exceed 25 mph.
- providing, free of charge, HEPA filters and weather striping to help sensitive receptors who live within 200 feet of the PSG to seal out fugitive dust and to inform the sensitive receptors how best to use them.

9

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My concern is with Air Quality, Question B.

On page 3-12, the MND states,

*The Project would be constructed in one phase lasting approximately 18 months. This analysis assumes that on-site equipment would consist of the simultaneous operation of two bulldozers, two excavators, one sediment shaker/sifter, three water trucks, and one street sweeper. The bulldozers, excavators, and sediment shaker were modeled as operating eight hours per day and the water trucks and street sweeper were modeled as operating four hours per day. Either a mounted impact hammer or hoe-ram would also be utilized during the demolition of the existing intake structure; however, the hoe-ram would most likely be mounted on an excavator that has been accounted for above, so no separate equipment was modelled for the hoe-ram.*

10

Please clarify if this means that there will be only one active work site in one basin at a time? If so, please explain why, as this is a large project and needs to be completed in 18 months, you did not model for multiple project sites? If not, please explain in more detail how more than one basin could be actively worked on with only this equipment, when you also plan to clean hazardous waste and demolish a intake canal and put in pipes in the intake canal area using some of the same equipment? How long will it take to perform the work planned in the intake canal which means that work on the basins will not be at full capacity?

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In conferring with a construction company owner/operator about the planned scope of the PSG project, his opinion was that the listed amount of equipment would be adequate to load 12 haul trucks an hour. Please explain in detail, with timing to show how feasible the proposed PSG construction plan is. How the project will load 180-240 haul trucks in an 8-hour day (240 daily haul truck trips is equal to 30 trucks per hour for an 8-hour day, which means that a haul truck would have to be loaded every 2 minutes.) Would this be feasible? Is 2 bulldozers, 2 excavators and a sifter be able to excavate, grade, load the shaker, stockpile the sifted dirt and then load a haul truck with 14 cubic yards of sediment every 2 minutes? How long does it take to load the sifter? How long does it take for the sifter to sift the loaded dirt? Can the sifter work if the sediment is too wet or too dry? How many cubic yards can be sifted in one hour or how long does it take for the sifter to sift enough sediment to load a 14 cubic yard haul truck?

11

If more than one site could be worked on or more equipment would be needed to perform the work necessary in an 8-hour day or the project is not feasible as proposed, then the model used to determine if the project would have a significant impact in answer to this question is not accurate and thus is flawed and could not be used to show that the project would have no significant impact

We would like to see the model redone with the corrected amount of equipment that would be reasonably expected to be used to do the work proposed in the MND.

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We would also like the following mitigation to be included:

- requiring all off-road diesel-powered construction equipment greater than 50 hp to meet the Tier 4 emissions standards
- requiring that all construction equipment be outfitted with BACT devices certified by CARB.
- requiring the Construction Contractor to supply a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit at the time of mobilization of each applicable unit of equipment.
- requiring the contractor to maintain and operate construction equipment to minimize exhaust emissions

12

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- Limiting truck idling to 5 minutes, off- and on-site
  - Limiting construction equipment both fixed and mobile idling time to 2 minutes
  - Not permitting the use of the perimeter road by any construction equipment, as this road runs less than 25 feet from the property line shared by the PSG and sensitive receptors
  - Using street sweepers that comply with SCAQMD Rules 1186 and 1186.1
  - Requiring that, where possible, construction equipment will obtain power from the power poles rather than the use of temporary diesel or gasoline powered generators.,
  - providing, free of charge, HEPA filters and weather striping to help sensitive receptors who live within 200 feet of the PSG and to inform the sensitive receptors how best to use them.
- 

12 cont.

On page 3-12

*Based on the Traffic Impact Study (TIS) prepared for the Project (Appendix F), the export of approximately 1.37 million cy of sediment would generate either 240 daily 14-cy haul truck trips or 180 daily 18-cy haul truck round trips and would generate approximately 18 worker trips per day based on a 6 days a week schedule. To account for the fugitive dust emissions that would occur from the segment of on-site dirt road travel, estimated to be an average 1/8-mile of each haul truck trip by the LACFCD, the model was set to 97.8 percent paved roads with unpaved roads with a moisture content of 12 percent and a mean vehicle speed of 15 miles per hour.*

There are several inaccuracies in this statement.

The daily number of haul truck trips was incorrectly calculated. The 240 daily 14-cy haul truck trips or 180 daily 18-cy haul truck round trips were calculated using the wrong number of hours per week which lead to an inflated number of total hours for the PSG project

The daily truck trips used in all of the CalEEMod and AERMOD models and calculations were computed as follows (per the cited equations on page 3-72 ).

69 hours/week x 52 week/year - 120 holiday hours/year = 3,468 hours/year x 1.5 years = 5,202 total hours

13

But this document and the project manager, John Bodenchak, has stated that the project will only be working for 40 hours per week. This calculation uses ten 12-hour days to account for holidays and other non-work days. The new figure for total work hours should be

40 hours/week x 52 week/year - 80 holiday hours/year = 2,000 hours/year x 1.5 = 3,000 total hours.

to calculate the work that can be done in the time period stated in this document.

The project has determined the number of haul trucks needed and modeled haul truck emissions, its overall emissions, equipment needs, traffic studies, air quality studies, used as a parameter in both with CalEEMod and AERMOD models and has determined that you can move 1.37 million cubic yards of sediment in 18 months, using 2 bulldozers, 2 excavators, 1 sifter, 3 water trucks, a street sweeper and haul the sediment in 18 months using a figure (total project hours) that overestimates by 2,202 hours or 58%.

Using the correct 3,000 total hours in the daily haul truck trips for the traffic study should be

Again using the same formula as in the MND (page 3-72).

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By calculating the daily number of truck trips with the same formula as the MND (page 3-72), but using 3,000 total project hours:

The number of truck trips, using 14-cubic yard capacity haul trucks is

Peak Hour Truck Trips = 1,370,000 cy of sediment to be exported ÷ 3,000 total working hours ÷ 14 cy per truck = 32.6 one-way truck trips.

Thus, for analysis purposes 33 inbound truck trips + 33 outbound truck trips = 66 total truck trips per hour should have been assumed.

Daily Truck Trips = 66 Peak Hour Truck Trips x 12 hours = 792 total truck trips per day (i.e., 396 inbound trips + 396 outbound trips).

13 cont.

The number of truck trips, using 18-cubic yard capacity haul trucks is

Peak Hour Truck Trips = 1,370,000 cy of sediment to be exported ÷ 3,000 total working hours ÷ 18 cy per truck = 25.3 one-way truck trips.

Thus, for analysis purposes 26 inbound truck trips + 26 outbound truck trips = 52 total truck trips per hour should have been assumed.

Daily Truck Trips = 52 Peak Hour Truck Trips x 12 hours = 624 total truck trips per day (i.e., 312 inbound trips + 312 outbound trips).

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Please explain how the ¼-mile average on-site dirt road travel was estimated? That equates to 660 feet or 220 yard. Does such a low figure imply that the haul trucks will not use the perimeter road that runs behind sensitive receptors? Why was the model set to 97.8 percent paved roads when the roads in the PSG are not paved? Why was the mean vehicle speed set to 15 miles per hour when 15 mph is the maximum speed on the unpaved roads? Did the traffic study also model both of the proposed alternate haul routes? If so why was the mean traffic speed set to 15 mph when speed of the majority of the haul routes would be the speed limit on the roads of 35 mph or on the freeway of 55 mph?

14

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More trucks means more fugitive dust emissions. Thus any conclusions based on the Traffic Impact Study (TIS) prepared for the Project (Appendix F) are flawed as it used the incorrect parameters of number of haul trucks generated and number of days of the week scheduled. The TIS would not account for the fugitive dust correctly because the number of haul trucks is incorrect. The TIS should be redone using the more accurate parameters of 312-396 haul trucks per day, 5 days a week scheduled and 8 hours a day to estimate the proper amount of emissions the project will generate.

15

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page 3- 16, Question C

The IS/MND states "the Project area is out of attainment for ozone (O3), PM10 (State only), and PM2.5." and uses table 3-3 through 3-5 to show that the PSG will be under the thresholds.

Why was the fugitive dust from the construction work (excavating, loading the sifter, sifting, and/or loading the haul truck) not included in the model? In the tables?

16

This does not show that the project will not have a significant impact. These are thresholds that show a project will have a less than significant impact when the area is in attainment. The conclusion that this is also true when the area is out of attainment, is false. If the region is not in attainment, then any impact of any level will be significant, and should be mitigated to no impact as much as possible, especially as the sensitive individuals in question are Los Angeles County residents.

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The Project should mitigate by

- providing that construction contracts shall explicitly stipulate that all construction equipment shall be properly tuned and maintained and operate construction equipment to minimize exhaust emissions,
- requiring construction equipment, fixed and mobile, to be equipped with properly operating and maintained particle filters,
- requiring that idling time of diesel powered equipment be limited to two minutes and that no idling within 300 feet of residences.
- requiring the use of dust barriers when work is being done within 400 feet of residences,
- requiring that if a complaint is made, all exposure parameters must be checked at the monitoring station and if exposure exceed the limits, work stops until the problem is found and fixed.
- The project manager shall provide residences within 200 feet of the project, air filtration and HEPA filters, free of charge, and provide any updates and information as to proper use of any installed air filters to ensure the residents have good air quality for the length of the project (18 months).

17

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page 3-10 Question D

Please explain why property lines were not used to measure distances?

18

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Will haul trucks be allowed to use the perimeter road that runs behind homes? Will the haul trucks be queueing on this road? Will construction equipment, both fixed and mobile be allowed to use the perimeter road?

19

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If the answer is affirmative then the MND has not shown that there is not a significant impact. The modeling performed did not seem to model for the fugitive dust of loading the sifter, sifting the sediment and loading the haul trucks. There will be more haul trucks than projected. The modeling for the fugitive dust should be redone to provide for a more accurate analysis model that will actually show if the project will have a significant health risk to the residents that live next to the PSG.

20

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The following mitigation for air quality and health should be

- providing that construction contracts shall explicitly stipulate that all construction equipment shall be properly tuned and maintained and operate construction equipment to minimize exhaust emissions,
- requiring construction equipment, fixed and mobile, to be equipped with properly operating and maintained particle filters,
- requiring that idling time of diesel powered equipment be limited to two minutes and that no idling within 300 feet of residences.
- requiring the use of dust barriers when work is being done within 400 feet of residences,
- not permitting the use of the perimeter road by any construction equipment, as this road runs less than 25 feet from the property line shared by the PSG and sensitive receptors
- requiring that if a complaint is made, all exposure parameters must be checked at the monitoring station and if exposure exceed the limits, work stops until the problem is found and fixed.
- the project manager shall provide residences within 200 feet of the project, air filtration and HEPA filters, free of charge, and provide any updates and information as to proper use of any installed air filters to ensure the residents have good air quality for the length of the project (18 months).

21

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This IS/MND has not shown that the impact would be less than significant. The analysis of the noise level was incorrectly modeled on the distance as the nearest home to the spreading grounds is closer than 35 feet and should be measured from the property line to the closest basin.

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22

The IS/MND also states that the activities occurring near these sensitive receptors would not be for more than a one hour interval. This is misleading as the basins would be worked on for several days, even weeks and it is probable that for a substantial amount of time construction activities will be occurring consistently for the entire 8-hour work day. This also assumes that no equipment or haul trucks will be using the perimeter road and no stationary equipment (the sifter) will be stationed and no haul trucks will be loaded within 100 feet of a residence, as it was modeled in this way. This is not stated in the MND and cannot be assumed.

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23

Noise also falls under *SCAQMD Rule 402, Nuisance*. Noise is a "material" which will cause "nuisance and annoyance" when they are actively working in the area closest to the sensitive receptors (which are closer than 35 feet from edge of the basin.)

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24

To mitigate this, per SCAQMD Rule 402, to a less than significant impact:

- state in the IS/MND that no equipment, stationary or mobile, will operate or use the perimeter road.
  - portable acoustical barriers/fences to be used near residences, park and church.
  - construction equipment, both fixed and mobile, shall be equipped with properly operation and maintained noise mufflers and intake silencers, consistent with manufacturer's' standards, with each piece of equipment individually inspected to ensure operation of the muffler and silencer equipment.
  - Noise monitoring will be conducted a minimum of 4 days per week when construction is within 400 feet of a residence.(residence is defined as a property line.).
- 

25

page 3-67, 3.16 Transportation/ Traffic

Traffic Impact Study, Pacoima Spreading Grounds Improvement Project, County of Los Angeles, California (TIS) dated August 2015 and prepared by Linscott, Law & Greenspan Engineers (LLG 2015). This report is provided in its entirety in Appendix F.

As stated previously, the potential daily haul truck trips is more than the parameter used in the traffic study. The onramp to the 5 freeway South has a meter as of 2/14/16, which was not accounted for in this study

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26

Please clarify, as haul trucks are not allowed to idle on city streets and will, per Project manager, John Bodenchak, be on site every six minutes, where the haul trucks will queue? The proposed entrance and exit is on Devonshire Street. Please explain what modeling was done to anticipate the impact to the intersection of Woodman Ave. and Devonshire St. and the residences on the north side of Devonshire St. and Devonwood Park on the corner of Woodman Ave. and Devonshire St.

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page 3-71 Project Trip Generator

The main inaccuracy in the MND is that the total number of hours was incorrectly calculated. This in turn means that the daily number of haul truck trips was incorrectly calculated. The 240 daily 14-cy haul truck trips or 180 daily 18-cy haul truck round trips are used in all of the CalEEMod and AERMOD models and calculations were computed as follows (per the cited equations on page 3-72 ).

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27

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$69 \text{ hours/week} \times 52 \text{ week/year} - 120 \text{ holiday hours/year} = 3,468 \text{ hours/year} \times 1.5 \text{ years} = 5,202 \text{ total hours}$

But this document and the project manager, John Bodenchak, has stated that the project will only be working for 40 hours per week. This calculation uses ten 12-hour days to account for holidays and other non-work days. The new figure for total work hours should be

$40 \text{ hours/week} \times 52 \text{ week/year} - 80 \text{ holiday hours/year} = 2,000 \text{ hours/year} \times 1.5 = 3,000 \text{ total hours.}$

to calculate the work that can be done in the time period stated in this document.

The project has determined the number of haul trucks needed and modeled haul truck emissions, its overall emissions, equipment needs, traffic studies, air quality studies, used as a parameter in both with CalEEMod and AERMOD models and has determined that you can move 1.37 million cubic yards of sediment in 18 months, using 2 bulldozers, 2 excavators, 1 sifter, 3 water trucks, a street sweeper and haul the sediment in 18 months using a figure (total project hours) that overestimates by 2,202 hours or 58%.

Using the correct 3,000 total hours in the daily haul truck trips for the traffic study should be

Again using the same formula as in the MND (page 3-72).

By calculating the daily number of truck trips with the same formula as the MND (page 3-72), but using 3,000 total project hours:

27 cont.

The number of truck trips, using 14-cubic yard capacity haul trucks is

Peak Hour Truck Trips =  $1,370,000 \text{ cy of sediment to be exported} \div 3,000 \text{ total working hours} \div 14 \text{ cy per truck} = 32.6 \text{ one-way truck trips.}$

Thus, for analysis purposes 33 inbound truck trips + 33 outbound truck trips = 66 total truck trips per hour should have been assumed.

Daily Truck Trips =  $66 \text{ Peak Hour Truck Trips} \times 12 \text{ hours} = 792 \text{ total truck trips per day (i.e., 396 inbound trips + 396 outbound trips).}$

The number of truck trips, using 18-cubic yard capacity haul trucks is

Peak Hour Truck Trips =  $1,370,000 \text{ cy of sediment to be exported} \div 3,000 \text{ total working hours} \div 18 \text{ cy per truck} = 25.3 \text{ one-way truck trips.}$

Thus, for analysis purposes 26 inbound truck trips + 26 outbound truck trips = 52 total truck trips per hour should have been assumed.

Daily Truck Trips =  $52 \text{ Peak Hour Truck Trips} \times 12 \text{ hours} = 624 \text{ total truck trips per day (i.e., 312 inbound trips + 312 outbound trips).}$

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### **Mandatory Finding of Significance**

As a mathematician, I am appalled at the lack of consistency used in your statistical models. There were inaccuracies (total hours) , misinterpretations (how distance was measured), inconsistency in parameters (8-hour and 12-hour workdays were used indiscriminately) and units (using wind speeds of meters per



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second), exponential data that was interpreted as linear (decibels), varying the data (sometimes the project 169 or 154 acres? ). The parameters should have been consistent across all models.

To allow this MND with its mistakes and inaccuracies as listed above to stand does a disservice to the communities of Mission Hills and Arleta. This Initial Study/Mitigated Negative Declaration must be amended and recirculated, better yet, it should go back for a full EIR because of its inaccuracies it fails to prove there will be no significant impact to air, noise and traffic.

28 cont.

Thank you in advance for responding in kind, and for reviewing and implementing the mitigation requests.

This project does not have to be done at the expense of the health and well being of the residents and communities around the PSG, but if the LACFCD does not explicitly put in the details that will mitigate this project into less than significant impact, it will be.

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Thank you,

Susan Milne

**Susan Milne (Milne)**

**February 25, 2016**

Milne-1 Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. CEQA requires that the existing environment be addressed based on what is in existence at the time of the document preparation. However, the findings of a CEQA document do not noticeably change with a one-year difference in schedule. The primary environmental topic that can be affected with time is air quality, which generally improves with time. Specifically, on page 3-11 of the 2016 MND is the following discussion: “It is noted that a construction initiation of Spring 2016, rather than 2017, was assumed at the time the air quality modeling was prepared. Therefore, this analysis presents a similar or more conservative picture of worst-case construction emissions because the mix of construction equipment would be the same or would have newer equipment, and emissions factors (amount of pollutant per horsepower hour) for newer equipment would be the same or less than for the replaced equipment. Similarly, on-road vehicles for material hauling and worker commute may be newer and less polluting with a later start of construction.”

As a separate endeavor, the LACFCD has performed a technical evaluation of alternative haul routes and a reduced weekly schedule based on public comments received on the 2016 MND. This involved additional traffic analysis and revised air quality, greenhouse gas, health risk assessment, and noise analyses to determine the relative effects on these environmental issues compared to the haul routes addressed in the 2016 MND. Through this process, the analysis of these topics was updated to a 2017 baseline year.

Milne-2 The LACFCD has performed a technical evaluation of alternative haul routes and a reduced schedule based on public comments received on the 2016 MND. The construction schedule for the Project was adjusted from 8-hour workdays conducted within the hours of 7:00 AM to 7:00 PM on Monday–Friday and 8:00 AM to 5:00 PM on Saturday over a period of approximately 18 months, to a maximum 8-hour workday conducted within the hours of 9:00 AM to 5:30 PM, Monday–Friday, with elimination of Saturday work, over a period of approximately 20 months. With this schedule adjustment, the Monday-Friday workday schedule is condensed (i.e. starting later and ending earlier) and would not involve weekend work.

As discussed on page 2-6 of the Recirculated MND, “Based on the revised schedule and disposal locations, the proposed Project would generate a total of 372 daily truck trip ends (186 inbound and 186 outbound) during a typical weekday using only 18-cy capacity haul trucks, plus 18 daily employee trip ends (390 trip ends total). This includes a total of 208 trip ends to the Vulcan pits on Modified Haul Route A and Haul Route B, and 164 trip ends to Sunshine Canyon Landfill on Haul Route C. Using solely 14-cy capacity trucks, the proposed Project would generate a total of 478 daily truck trip ends during a typical weekday, including 268 trip ends to the Vulcan pits and 210 trip ends to Sunshine Canyon Landfill, plus 18 employee trip ends (496 trip ends total). However, in reality, a combination of 14-cy and 18-cy capacity trucks would be used, resulting in between 372 and 478 total daily truck round trips, plus 18 employee round trips.”

Based on coordination with the LACFCD, the following are assumed:

- Total sediment to be exported = 1,370,000 cy, with 1 cy = 1.5 tons
- Up to 2,800 tpd would be exported to the Vulcan pits and up to 2,200 tpd would be exported to the Sunshine Canyon Landfill.
- Hours of Truck Hauling Operations: Mondays to Fridays, 9:00 AM to 5:30 PM (8 hours of hauling per day are assumed). Trip ends are one-way traffic movements, entering or leaving.

Based on these assumptions, daily truck trips are calculated as follows:

- Daily truck trips to/from the Vulcan pits were derived based on the following, using 14-cy capacity per haul truck: (2,800 tons per day) x (1 cy per 1.5 tons) = 1,867 cy per day / 14 cy per truck = 134 inbound trips + 134 outbound trips = 268 total daily truck trips.
- Daily truck trips to/from the Sunshine Canyon Landfill site were derived based on the following, using 14-cy capacity per haul truck: (2,200 tons per day) x (1 cy per 1.5 tons) = 1,467 cy per day / 14 cy per truck = 105 inbound trips + 105 outbound trips = 210 total daily truck trips.
- Daily truck trips to/from the Vulcan pits were derived based on the following, using 18-cy capacity per haul truck: (2,800 tons per day) x (1 cy per 1.5 tons) = 1,867 cy per day / 18 cy per truck = 104 inbound trips + 104 outbound trips = 208 total daily truck trips.
- Daily truck trips to/from the Sunshine Canyon Landfill site were derived based on the following, using 18-cy capacity per haul truck: (2,200 tons per day) x (1 cy per 1.5 tons) = 1,467 cy per day / 18 cy per truck = 82 inbound trips + 82 outbound trips = 164 total daily truck trips.

These Project revisions involved additional traffic analysis and revised air quality, greenhouse gas, health risk assessment, and noise analyses to determine the relative effects on these environmental issues compared to the haul routes addressed in the 2016 MND.

However, subsequent to circulation of the Recirculated MND and as discussed in Section 4.0, Clarifications, of this document, due to requirements and limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements, sediment export is estimated to result in a maximum of 476 trip ends (or 238 inbound and 238 outbound trips to the disposal facility and back), including 276 trip ends to and from the Cal-Mat pit and 200 trip ends to and from Sunshine Canyon Landfill. Additionally, due to the changed circumstances of the disposal conditions, the LACFCD has determined that the anticipated construction period will be extended from approximately 20 months up to a maximum of 36 months. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.

Milne-3

Under CEQA, an EIR is required when there would be impacts that would not be avoided or reduced to a less than significant level with project changes or with mitigation measures (Section 15064(a)(1) of the State CEQA Guidelines). The 2016 MND acknowledges the Project would result in increased air emissions and

noise and quantifies the increases to compare to the quantitative thresholds for these environmental topics (i.e., air quality, noise). As discussed in the 2016 MND and affirmed by the additional technical studies prepared based on the redefined haul routes in the Recirculated MND, there would be no significant impacts after changes to the Project and/or implementation of mitigation measures. Therefore, an MND is the appropriate CEQA documentation for the Project.

Milne-4 The methodology used to measure the distances from the sensitive receptors is described in page 2-5 of the 2016 MND and page 3-10 of the Recirculated MND. The measurements are the shortest distance from the disturbance area on the Project site to the nearest structure (for residences and the church) and the nearest use area (for parks, as these have no structures). Disturbance refers to excavation, vehicle traffic, and other construction activity that would disturb the ground surface. It should be noted the nearest disturbance area is not necessarily the edge of the County-owned property. The distance is ascertained through measurement on aerial maps, such as Google Earth, and is considered accurate and adequate for purposes of modeling air and noise effects of a project. It is correct that the SCAQMD Rule 403 refers to property lines; however, it is referring to the location at which visible dust is not permitted and can create a nuisance (SCAQMD Rule 402).

The Project would disturb most, but not all, of the site; there are areas around the perimeter of the spreading basins that would not be disturbed by Project implementation (page 3-10 of the Recirculated MND). Further, based on public feedback, the LACFCD would prohibit use of the perimeter road of the spreading grounds for truck loading. As such, the air quality modeling did not include construction equipment on the perimeter road. Also, as discussed on pages 3-10 and 3-11 of the Recirculated MND, "Consistent with Title 13 of the *California Code of Regulations* Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, where the perimeter road is 100 feet or less from a home, there must not be any vehicle queuing activity with idling lasting more than five minutes." The purpose of the State's idling limit of five minutes is to protect the public health and compliance with this regulation is considered adequate for purposes of the air quality analysis.

Milne-5 The Project would be performed in a maximum 8-hour workday conducted between the hours of 9:00 AM and 5:30 PM, within the longer (14-hour) window allowed by City of Los Angeles standards, from Monday through Friday. Therefore, the construction crew will work approximately 40 hours per week. It is noted that the 2016 MND addressed a Monday through Saturday schedule. However, based on public comments received on the 2016 MND and in connection with redefining the haul routes, it was decided to reduce to work week by eliminating Saturday activities.

Milne-6 This comment is acknowledged.

Milne-7 Regulatory requirements (RRs), such as RR AQ-1 that directs compliance with Rule 402 and 403, are based on local, State, and/or federal regulations or laws that are required independent of CEQA review, yet also serve to offset or prevent certain impacts. Because regulatory requirements are required to be part of a project's design or implementation and are separate from the CEQA process, they do not constitute mitigation measures. Implementation of fugitive dust control, including coordination with SCAQMD, would be required of the Project regardless

of the CEQA process, and therefore does not need to be defined to assess the impacts of a project. The list of specific dust control measures that a project, if approved, will enact to achieve appropriate dust control is generally determined subsequent to the CEQA process.

Based on public comments on the 2016 MND, additional detail has been added to RR AQ-1 in the Recirculated MND regarding anticipated contractor requirements to management fugitive dust on the spreading grounds and within the haul trucks under Rule 403. The Contractor would be required implement fugitive dust control would be performed consistent with SCAQMD Rule 403, including additional requirements for large operations (RR AQ-1). This would include preparation of a Fugitive Dust Control Plan. However, it should be noted that per the County standard operating procedures, the Rule 403-compliant Fugitive Dust Control Plan will be prepared by the selected contractor, which has not been decided at this time. The Fugitive Dust Control Plan must be submitted for review and approval by the LACFCD before Project initiation.

In addition to a Fugitive Dust Control Plan, Contractor compliance with Rule 403 requirements would include, but not be limited to:

- A Dust Control Supervisor, who possesses a current certification from SCAQMD, would be designated. The Dust Control Supervisor would be responsible for preparing the Dust Control Plan.
- Signage, meeting the standards of the Rule 403 Implementation Handbook, would be installed around the Project site prior to initiating any sediment removal activities. The signage would provide an appropriate contact person(s) and phone number(s) to call with dust-related complaints and the phone number of the SCAQMD compliance office. The signage would remain and be maintained for the length of the Project.
- Daily inspections would be conducted by the Dust Control Supervisor, and specific dust control actions would be documented on the SCAQMD Inspections form from the Rule 403 Implementation Handbook.
- Watering exposed surfaces at least three times per day or more during windy conditions. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour.
- Fugitive dust would be controlled during after-hours through the implementation of Best Available Control Measures (BACM) identified in SCAQMD Rule 403 and the Fugitive Dust Control Plan. Non-toxic soil stabilizers/dust suppressants, resistant to wind erosion, that create a crust on the surface may be selected and applied consistent with Rule 403.
- Traffic speeds on unpaved roads would be restricted to no more than 15 miles per hour.
- One or more devices would be installed at ingress/egress points to remove dirt from vehicle tires and undercarriage prior to leaving the site.
- All materials to be loaded for export would be pre-watered.
- All haul trucks would be covered (with on board tarp).

Based on public comments on the Recirculated MND, the Contractor specifications for Rule 403 compliance shall state that all haul trucks will be covered with an on-board tarp. The alternate means of limiting dust generation from trucks of maintaining two feet or more of freeboard will not be an option. The text of RR AQ-1 has been edited accordingly in Section 4.0, Clarifications, of this document.

Based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM10; the requirements for this monitoring will be included in the Contractor specifications.

Milne-8 Regulatory requirement (RR) AQ-1 directs compliance with SCAQMD Rule 402 and 403 (refer to page 3-10 of the 2016 MND). Please refer to Response Milne-7, above.

Milne-9 The Contractor will be required to comply with all applicable requirements of SCAQMD Rule 403 such that a nuisance (Rule 402) is not created. Please refer to Response Milne-7, above, for additional details on Rule 403 implementation defined at this time. The MM AQ-1 requires all off-road equipment greater than 50 horsepower operated on the Project site to meet Tier 4 Final emissions standards, which is consistent with the County's current standard operating procedures. Based on public feedback, the LACFCD would prohibit use of the perimeter road of the spreading grounds for truck loading, and the following contract special provisions have been defined for the proposed Project:

- Section 3-12.1.2 shall require all trucks used for transporting all excavated material shall meet the United States Environmental Protection Agency's emission standards for model year 2013 or newer.
- Section 3-12.1.4 shall restrict idling to less than five minutes per Title 13, CCR, Section 2485. In addition, all trucks shall be prohibited from idling within 100 feet from any residential area and no idling at schools. Signs shall be posted at all Project site entrances/exits and loading areas.
- Per Section 3-12.2.2, the Contractor shall comply with SCAQMD Rule 402 and Rule 403 Large Operations, shall comply with SCAQMD Rule 403 requirements for wind gusts over 25 miles per hour (mph), all haul trucks shall be covered (no exceptions). Section 3-12.2.2 of the contract special provisions are stricter than Rule 403 and California Vehicle Code 23114. Details will be included in the Fugitive Dust Control Plan.

The LACFCD would prepare a Fugitive Dust Plan consistent with all requirements of Rule 403. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour. Proper equipment maintenance would be required as part of the Contractor specifications, and this specification is a standard operating procedure of the LACFCD. Refer to Response Milne-7, above, for a description of additional, voluntary measures to be implemented by LACFCD to reduce both NOx and PM10 (i.e., dust) emissions.

Preparation of the 2016 MND involved the preparation of a Health Risk Assessment for emissions of fugitive dust (PM10 and PM2.5) and diesel particulates (see Section 3.3, Air Quality, of the 2016 MND and the Recirculated MND). This assessment has been updated based on the redefined haul routes and construction hours. Consistent with the findings of the 2016 MND, the Project would result in a less than significant cancer risk, non-cancer chronic health risk,



and non-cancer acute health risk. The modeled air quality is based on exterior conditions; interior air conditions can be better or worse (depending on interior sources of pollutants such as smoking) than exterior conditions. However, the interior air quality due to Project implementation would be the same or better than the exterior air quality such that air filters/HEPA filters would not be necessary.

Additional Contractor specifications may include equipment and process requirements to minimize air pollutant emissions to the extent feasible based on technology, cost, and schedule constraints. However, with implementation of MMs AQ-1 and AQ-2, there would be less than significant impact related to air quality emissions.

LACFCD anticipates the only power use necessary would be for the field office, a portable trailer or similar, tire wash stations, and scales. LACFCD is currently coordinating with LADWP on the best way to connect these temporary uses to existing power poles and lines serving the Project site. If connection to existing power lines is not feasible, these uses would be powered by generators. These generators would be placed at a distance of at least 30 feet from any sensitive receptors and would meet Tier 4 Final emissions standards. Sensitive receptors are identified in the Recirculated MND as being located as near as 30 feet from the proposed improvements. At this distance, noise generated from the operation of dozers, excavators, and haul trucks was determined to be attenuated (reduced) due to distance such that the noise level at the receptor was below the noise threshold. Generator operation is quieter than the above-referenced pieces of equipment; therefore, noise from operation of a generator placed at least 30 feet from the nearest receptor would not exceed the noise threshold. Regarding air quality, implementation of MM AQ-1 from the Recirculated MND requiring use of all Tier 4 off-road equipment would apply to the generators and ensure that its contribution of the daily maximum of emissions is within the SCAQMD thresholds.

Milne-10      Because of the distance between the Project site and the lead-impacted soils (at least 75 feet) (assumed to be the hazardous waste referenced in the comment), implementation of the Project is not dependent or otherwise related to the removal of these shallow soils. Additionally, prior to commencement of the Project, the lead-impacted soil area would be fenced off to prevent any access during construction activities. Based on this delineation, the LACDPW will be arranging for the excavation and appropriate disposal of the localized, shallow area of lead-impacted soils by a qualified consultant. This excavation will occur separately from earth-moving activities associated with the Project, and the excavated area will be backfilled with clean fill soils (refer to page 3-52 of the Recirculated MND).

Regarding on-site equipment identified in the air quality modeling parameters, air quality emissions were modeled for four different sources: on-site equipment, worker trips, demolition truck trips, and haul truck trips. The types and quantities of on-site construction equipment used in air quality modeling with CalEEMod for criteria pollutants is intended to represent a reasonable worst-case scenario of continuous activity (over eight hours) with a combination of equipment that could occur all at one time, to estimate the maximum daily emissions. Vehicle trips are modeled based on the actual number of trips that would occur if construction activity were evenly divided over the course of the Project, or the same every day. The modeling parameters are not meant to be a specific day-to-day prescription for equipment. In reality, the combination of equipment and intensity of activity varies on construction sites on a daily level but would be within the parameters of

the maximum emissions. The air quality modeling parameters are intended to be the typical or likely combination of emissions sources, and not a prescription for equipment or the locations of equipment.

Milne-11 Please refer to Responses Milne-10 and Milne-13, above and below. As discussed, beginning on page 3-15 of the Recirculated MND, “The types and quantities of on-site construction equipment used in air quality modeling with CalEEMod for criteria pollutants is intended to represent a reasonable worst-case scenario of continuous activity (over eight hours) with a combination of equipment that could occur all at one time, to estimate the maximum daily emissions. It is noted that, while the total work day is eight hours, there would not generally be continuous activity with a combination of equipment for this period. Construction activities involving equipment emissions would occur in an intermittent fashion (i.e., with engines on and off) and in varying locations over the course of a work day. Vehicle trips are modeled based on the actual number of trips that would occur if construction activity were evenly divided over the course of the Project, or the same every day, and are based on the Revised TIA prepared for the Project and dated July 2017 (Appendix F). The modeling parameters are not a specific day-to-day prescription for equipment but represent the modeled scenario intended to capture the worst-case emissions. The combination of equipment and intensity of activity varies on construction sites on a daily level but would be within the parameters of the maximum emissions.”

In other words, the equipment listed in the 2016 MND and the Recirculated MND are intended as hypothetical model parameters and not a prescription. The model estimates the listed equipment running continuously for eight hours straight, and all the listed equipment operating at one time. This would not occur in reality. The assumptions were made purely to develop worst-case daily emissions to ensure the actual combination of equipment operating across the site would result in emissions less than assessed for environmental impacts. The actual implementation of the Project within approximately 20 months was considered feasible by the LACFCD within this limitation. It is noted that only the small portion of soil being used as backfill at the headworks would require sifting, and as such the great majority of excavated sediment would be transferred immediately to a haul truck. Regardless, the model parameters are accurate and appropriate, and the assertion that the air quality modeling is flawed and must be redone, is unsubstantiated. In light of these facts, re-running the CalEEMod model was not required in response to this comment.

Additionally, subsequent to circulation of the Recirculated MND and as discussed further in Section 4.0, the LACFCD has determined that the anticipated construction period will be extended from approximately 20 months up to a maximum of 36 months. This extension is primarily as a result of limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.

Milne-12 Please refer to Responses Milne-9 through Milne-11, above. Regarding off-road equipment emissions standards, as discussed on page 3-16 of the Recirculated MND, “For the year 2018, the CalEEMod assumes that the on-site equipment will average at approximately a Tier 3 level; however, that may be achieved with a mix

of Tier 0, 1, 2, 3, or 4 equipment. Tiers 0 through 4 refer to off-road diesel-engine equipment with specified levels (i.e., tiers) of emissions standards for PM10 and NOx adopted by CARB, with more stringent emissions standards adopted over time corresponding to a higher tier number. The CalEEMod model utilizes the worst-case engine Tier level allowed under CARB's regulations for off-road diesel equipment." This is to model a reasonable worst-case scenario, but not to prescribe the equipment.

Therefore, based on the CalEEMod methodology, the requirement for Tier 4 off-road equipment is presented as mitigation. Specifically, MM AQ-1 would require all off-road equipment greater than 50 horsepower operated on the Project site to meet Tier 4 Final emissions standards and is consistent with the County's current standard operating procedures. As stated in MM AQ-1, this requirement shall be monitored by the Construction Inspector, when inspecting the site. A LACFCD construction inspector will be at the job site during construction activities and will enforce thresholds with regards to noise, dust, and air emissions.

Additionally, the following contract special provisions have been defined for the proposed Project. The planned contract special provisions are stricter than Rule 403 and Section 23114 of the California Vehicle Code:

- Section 3-12.1.2 shall require all trucks used for transporting all excavated material shall meet the United States Environmental Protection Agency's emission standards for model year 2013 or newer.
- Section 3-12.1.4 shall restrict idling to less than five minutes per Title 13, CCR, Section 2485. In addition, all trucks shall be prohibited from idling within 100 feet from any residential area and no idling at schools. Signs shall be posted at all Project site entrances/exits and loading areas.
- Per Section 3-12.1.4, the Contractor is subject to the South Coast Air Quality Management District (SCAQMD) Rule 203 Permit to Operate. The Contractor shall provide proof of compliance prior to mobilizing equipment.
- Per Section 3-12.1.4, the Contractor shall maintain and operate construction equipment to minimize exhaust emissions.
- Per Section 3-12.1.5, Street sweepers shall be compliant with SCAQMD Rules 1186 and 1186.1.
- Per Section 3-12.1.5, the Contractor's SCAQMD-certified Fugitive Dust Control Supervisor shall prepare a Fugitive Dust Control Plan.
- Per Section 3-12.2.2, the Contractor shall comply with SCAQMD Rule 402 and Rule 403 Large Operations, shall comply with SCAQMD Rule 403 requirements for wind gusts over 25 miles per hour (mph), all haul trucks shall be covered (no exceptions). Section 3-12.2.2 of the contract special provisions are stricter than Rule 403 and California Vehicle Code 23114. Details will be included in the Fugitive Dust Control Plan.
- Per Section 3-12.2.3, the Contractor shall be required to submit a comprehensive inventory of all off-road diesel-powered construction equipment, on-road diesel haul trucks, street sweepers, generators and all other owned, and leased equipment/vehicles, including those of Subcontractors, suppliers, and brokers. The inventory shall include the certification documents, executive orders issued from the California Air

Resources Board (CARB) identifying the tier rating, horsepower rating, engine production year, and emissions data. No equipment shall be allowed on site that does not meet these requirements or has not submitted documentation.

- In addition, the Contractor shall be required to provide monthly reports to the LACFCD Engineer. The Engineer will verify that all off-road diesel-powered construction equipment and haul trucks meet the required standards.

Additionally, the LACFCD has determined to voluntarily include air monitoring for PM10; the requirements for this monitoring will be included in the Contractor specifications. Based on public feedback, the LACFCD would prohibit use of the perimeter road of the spreading grounds for truck loading. LACFCD anticipates the only power use necessary would be for the field office, a portable trailer or similar, tire wash stations, and scales. LACFCD is currently coordinating with LADWP on the best way to connect these temporary uses to existing power poles and lines serving the Project site. If connection to existing power lines is not feasible, these uses would be powered by generators. These generators would be placed at a distance of at least 30 feet from any sensitive receptors and would meet Tier 4 Final emissions standards.

Limiting idling to 2 minutes would be a prohibitive constraint on the Project based on the location of some of the basins and necessary excavation to improve the water conservation at the facility. Finally, the modeled air quality is based on exterior conditions; interior air conditions can be better or worse (depending on interior sources of pollutants such as smoking) than exterior conditions. However, the interior air quality due to Project implementation would be the same or better than the exterior air quality such that air filters/HEPA filters would not be necessary.

Milne-13

The LACFCD has performed a technical evaluation of alternative haul routes and a 40-hour work week based on public comments received on the 2016 MND. This involved additional traffic analysis and revised air quality, greenhouse gas, health risk assessment, and noise analyses to determine the relative effects on these environmental issues compared to the haul routes addressed in the 2016 MND. For the currently proposed Project, with a 40-hour work week and 8-hour work day, the Project was anticipated to require approximately 20 months to complete. Specifically, as shown in the footnotes to Tables 3-22 and 3-23 in the Recirculated MND:

Based on coordination with the LACFCD, the following were assumed:

- Total sediment to be exported = 1,370,000 cy, with 1 cy = 1.5 tons
- Up to 2,800 tpd would be exported to the Vulcan pits and up to 2,200 tpd would be exported to the Sunshine Canyon Landfill.
- Hours of Truck Hauling Operations: Mondays to Fridays, 9:00 AM to 5:30 PM (8 hours of hauling per day are assumed). Trip ends are one-way traffic movements, entering or leaving.

Based on these assumptions, daily truck trips were calculated as follows:

- Daily truck trips to/from the Vulcan pits were derived based on the following, using 14-cy capacity per haul truck: (2,800 tons per day) x (1 cy per 1.5 tons) = 1,867 cy per day / 14 cy per truck = 134 inbound trips + 134 outbound trips = 268 total daily truck trips.
- Daily truck trips to/from the Sunshine Canyon Landfill site were derived based on the following, using 14-cy capacity per haul truck: (2,200 tons per day) x (1 cy per 1.5 tons) = 1,467 cy per day / 14 cy per truck = 105 inbound trips + 105 outbound trips = 210 total daily truck trips.
- Daily truck trips to/from the Vulcan pits were derived based on the following, using 18-cy capacity per haul truck: (2,800 tons per day) x (1 cy per 1.5 tons) = 1,867 cy per day / 18 cy per truck = 104 inbound trips + 104 outbound trips = 208 total daily truck trips.
- Daily truck trips to/from the Sunshine Canyon Landfill site were derived based on the following, using 18-cy capacity per haul truck: (2,200 tons per day) x (1 cy per 1.5 tons) = 1,467 cy per day / 18 cy per truck = 82 inbound trips + 82 outbound trips = 164 total daily truck trips.

As shown, all efforts were made to continue to reflect accurate figures as the basis of the Project parameters in the Recirculated MND. Subsequent to circulation of the Recirculated MND, and as discussed further in Section 4.0, the LACFCD has determined that the anticipated construction period will be extended from approximately 20 months up to a maximum of 36 months, and sediment export is estimated to result in a maximum of 476 trip ends (or 238 inbound and 238 outbound trips to the disposal facility and back), including 276 trip ends to and from the Cal-Mat pit and 200 trip ends to and from Sunshine Canyon Landfill. This extension is primarily as a result of limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.

- Milne-14      The 1/8 mile refers to the portion of each haul truck trip that would occur on dirt roads, rather than paved roads. This detail was important to capture the greater amount of dust generated by driving on dirt roads than paved. Similar to the estimate of air emissions by construction equipment, the 1/8 mile of dirt road travel is meant to be a reasonable worst-case estimate, not a prescription. In evaluating the revised Project, it was determined that paving or placing barrier material over the central, unpaved, levee would be required to reduce fugitive dust emissions to a less than significant level. As such, there would be less than 1/8 mile, on average, travel on unpaved roads. The circulation of haul trucks and construction equipment was assessed by the LACFCD early in the Project development, and the proposed construction scenario is considered feasible.
- Milne-15      Please refer to Response Milne-13, above.
- Milne-16      Fugitive dust is the common term that refers collectively to PM10 and PM2.5 (particulate matter of two different sizes) and is a result of construction activity rather than a source. As discussed on page 3-15 of the Recirculated MND, "The SCAQMD has established methods to quantify air emissions associated with

construction activities such as air pollutant emissions generated by operation of on-site construction equipment; fugitive dust emissions related to earthwork activities; and mobile (tailpipe) emissions from construction worker vehicles and haul/delivery truck trips. Fugitive dust is the common term that refers collectively to PM10 and PM2.5. Emissions vary from day to day, depending on the level of activity; the specific type of construction activity occurring; and, for fugitive dust, prevailing weather conditions.” As discussed, beginning on page 3-15 of the Recirculated MND, “A construction-period mass emissions inventory was compiled based on an estimate of construction equipment as well as daily schedule and activity assumptions, as detailed below. The mass emissions SCAQMD thresholds are based on the rate of emissions (i.e., pounds of pollutants emitted per day). Air quality emissions were modeled for four different sources: on-site equipment, worker trips, demolition truck trips, and haul truck trips. The types and quantities of on-site construction equipment used in air quality modeling with CalEEMod for criteria pollutants is intended to represent a reasonable worst-case scenario of continuous activity (over eight hours) with a combination of equipment that could occur all at one time, to estimate the maximum daily emissions. It is noted that, in reality, while the total work day is eight hours, there would not generally be continuous activity with a combination of equipment for this period. Construction activities involving equipment emissions would occur in an intermittent fashion (i.e., with engines on and off) and in varying locations over the course of a work day. Vehicle trips are modeled based on the actual number of trips that would occur if construction activity were evenly divided over the course of the Project, or the same every day, and are based on the Revised TIA prepared for the Project and dated July 2017 (Appendix F). The modeling parameters are not a specific day-to-day prescription for equipment but represent the modeled scenario intended to capture the worst-case emissions. The combination of equipment and intensity of activity varies on construction sites on a daily level but would be within the parameters of the maximum emissions.”

The reference to road dust in the model is a source of dust, and is specified as 1/8 mile unpaved (i.e., dirt) for each truck trip with the remainder (i.e., 97.8 percent as identified on the data sheets) as paved road. As such, the air quality modeling included fugitive dust emissions and does not have to be re-run.

The assertion that any contribution of a criteria air pollutant for which the air basin is in non-attainment is a significant impact is not accurate. The SCAQMD thresholds for maximum daily regional emissions are expressly based on the levels that will maintain attainment for those pollutants already in attainment and would not interfere with achieving attainment for those pollutants not in attainment.

Milne-17

Proper equipment maintenance and filter use would be required as part of the Contractor specifications, and this specification is a standard operating procedure of the LACFCD.

Limiting of idling time of diesel-powered equipment to two minutes and no idling within 300 feet of residences, assumed to mean the shared property line, would be a prohibitive constraint on the Project based on the location of some of the basins and necessary excavation to improve the water conservation at the facility. As discussed in Response Milne-9, above, Section 3-12.1.4 of contract special provisions shall restrict idling to less than five minutes per Title 13, CCR, Section 2485. In addition, all trucks shall be prohibited from idling within 100 feet from any



residential area and idling at schools. Signs shall be posted at all Project site entrances/exits and loading areas.

With regard to dust barriers, mitigation (MM NOI-1) was required to build a sound wall to reduce the noise impact along the headworks prior to construction activity in this area (refer to pages 3-72 and 3-73 of the Recirculated MND). Based on public feedback, the LACFCD has opted to also install the sound wall along the private-facing perimeter (i.e., where the spreading basins abut private land uses). The sound wall would be at least eight feet high and would be installed prior to construction activities. The sound wall would also reduce transmission of any particles entrained in the air.

Because air quality emissions and health risk would be less than significant with implementation of MMs AQ-1 and AQ-2, ambient air monitoring stations on the site during construction activity is not required. However, all complaints made to the on-site contact, whose information will be placed on signage along the Project site, will be investigated. Further, based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM<sub>10</sub>; the requirements for this monitoring will be included in the Contractor specifications.

Preparation of the 2016 MND involved the preparation of a Health Risk Assessment for emissions of fugitive dust (PM<sub>10</sub> and PM<sub>2.5</sub>) and diesel particulates (see Section 3.3, Air Quality, of the 2016 MND and the Recirculated MND). This assessment has been updated based on the redefined haul routes and construction hours, and consistent with the findings of the 2016 MND, the Project would result in a less than significant cancer risk, non-cancer chronic health risk, and non-cancer acute health risk. The modeled air quality is based on exterior conditions; interior air conditions can be better or worse (depending on interior sources of pollutants such as smoking) than exterior conditions. However, the interior air quality due to Project implementation would be the same or better than the exterior air quality such that air filters/HEPA filters would not be necessary. Please also refer to Response Milne-12, above.

Milne-18 Please refer to Response Milne-4, above.

Milne-19 Based on public feedback, the LACFCD would prohibit use of the perimeter road of the spreading grounds for truck loading.

Milne-20 Please refer to Response Milne-19, above. Air quality emissions were modeled for four different sources: on-site equipment, worker trips, demolition truck trips, and haul truck trips. The types and quantities of on-site construction equipment used in air quality modeling with CalEEMod for criteria pollutants is intended to represent a reasonable worst-case scenario of continuous activity (over eight hours) with a combination of equipment that could occur all at one time, to estimate the maximum daily emissions. Vehicle trips are modeled based on the actual number of trips that would occur if construction activity were evenly divided over the course of the Project, or the same every day. The modeling parameters are not meant to be a specific day-to-day prescription for equipment. In reality, the combination of equipment and intensity of activity varies on construction sites on a daily level but would be within the parameters of the maximum emissions. Regarding loaders, excavators can serve to load the haul trucks. As such, the air quality modeling included fugitive dust emissions and does not have to be re-run.

- Milne-21 Please also refer to Responses Milne-12, Milne-17, and Milne-19, above.
- Milne-22 Please refer to Response Milne-4, above.
- Milne-23 The one-hour noise level refers to a steady state, or constant, equivalent noise level for that period of time. The inherent nature of the proposed activities in the spreading basins result in the construction equipment moving around, as well as stopping and starting, within a localized area (e.g., part of one basin) for a period of time, and then another, and eventually moving over the entirety of the spreading grounds, which are quite large. Therefore, the volume of construction noise would be highly variable over each hour and each day at each receptor. Whereas in the headworks area, construction activity would be confined to only the existing channel area and all noise generation would emanate from within a narrow geographic area. Hence the more restrictive noise level standard was applied for this area of the Project site, rather than applying one standard for all areas.
- It is noted that while it is true that A-weighted noise levels are measured on a logarithmic scale, a noise level of 82 dBA  $L_{eq}$  is not twice the applied threshold. Specifically, a doubling of a noise level of 80 dBA is 100 dBA; the 20 dBA difference represents an increase in sound energy (which creates the noise) of 100 times (i.e., 10 times 10). It is also noted that the modeled noise levels generally overestimate the actual noise levels that would be experienced and represent the highest noise level at the closest point to a receptor based on the expected construction scenario. As such, all noise levels further from a receptor would be less than the estimated noise level. Noise attenuates (lessens) at a rate of approximately 6 dBA per doubling of distance over a hard surface; the noise attenuation rate is greater over a soft surface such as soils. For the reasons discussed above, the thresholds applied are appropriate to the circumstances of the Project. Please also refer to Response Milne-19, above.
- Milne-24 SCAQMD Rule 402 does refer to “air contaminants or other material” being discharged such that injury, detriment, nuisance, or annoyance is caused. However, Rule 402 does not refer to generation of noise and vibration and does not specify that air emissions be kept below detectable levels. With regard to fugitive dust, Rule 403 requires that “no person shall cause or allow the emissions of fugitive dust from any active operation, open storage pile, or disturbed surface area such that (A) the dust remains visible in the atmosphere beyond the property line of the emission source; or (B) the dust emission exceeds 20 percent opacity if the dust emission is the result of movement of a motorized vehicle.
- Milne-25 Please refer to Responses Milne-17, Milne-19, and Milne-24, above.
- Milne-26 The Revised TIA included manual vehicle classification counts of turning movements (i.e., traffic counts), which were conducted at each of the 56 study intersections during the weekday morning (7:00 AM to 10:00 AM), mid-day (12:00 PM to 2:00 PM), and afternoon (3:00 PM to 6:00 PM) commuter periods to determine the peak-hour traffic volumes. The traffic counts were conducted at 14 study intersections in 2014, 10 study intersections in 2015, and 32 study intersections in 2016. The counts were timed to ensure schools were in session. All traffic counts have been increased by 1.5 percent annually to reflect assumed ambient growth for 2017 existing conditions. The presence of a meter at the Paxton Street freeway ramp would, if anything, improve the existing condition of that intersection.

As presented in the 2016 MND, all haul truck traffic would travel via the gate on Arleta Avenue. There was no impact to Devonshire Street; therefore, study intersections along this road were not addressed. Under the revised Project analyzed in the Recirculated MND, haul truck traffic to and from Sunshine Canyon Landfill would travel via the gate on Devonshire Street (please refer to Exhibit 2-11 in the Recirculated MND). Accordingly, study intersections along the new Haul Route C, including the intersection of Devonshire Street and Woodman Avenue, Lemona Avenue, and Sepulveda Boulevard, and the northbound and southbound I-405 ramps, were addressed in the Revised TIA (please refer to Exhibit 3-7 in the Recirculated MND). As such, there would be no change to the findings of the Revised TIA in the Recirculated MND.

Milne-27      Please refer to Response Milne-13, above.

Milne-28      Please refer to Responses Milne-1 through Milne-27, above. Under CEQA, an EIR is required when there would be impacts that would not be avoided or reduced to a less than significant level with project changes or with mitigation measures (Section 15064[a][1] of the State CEQA Guidelines). The 2016 MND acknowledges the Project would result in increased air emissions and noise and quantifies these increases to compare to the quantitative thresholds for these environmental topics (i.e., air quality, noise). As discussed in the 2016 MND and affirmed by the additional technical studies prepared based on the redefined haul routes, there would be no significant impacts after changes to the Project and/or implementation of mitigation measures. Therefore, an MND is the appropriate CEQA documentation for the Project.

**From:** lech maria polonski  
**Sent:** Wednesday, February 24, 2016 8:31 PM  
**To:** DPW-SpreadingGrounds  
**Subject:** Pacoima Spreading Grounds Improvement project.

John Bodenchak

County of Los Angeles

Department of Public Works

Water Resources Division

Re: Pacoima Spreading Grounds Improvement Project.

**Polonski**

I think we need to develop water resources for the great Los Angeles, and the Pacoima Spreading Grounds Improvement Project is the right project to do. My concern is that even though the project, when completed, is to benefit the whole county and LADWP, in the meantime - during the construction, it will create hardship for our neighborhood and our quality of life.

Thank you for your outreach and the Initial Study/MND; but still, I have some questions:

A. Fugitive dust:

1/ How many high winds days are included/calculated in the impact/mitigation study and projections?	1
2/ How is the excavation site to be protected after working hours?	2
3/ How is the air quality in our neighborhood to be monitored during the project; where/when the samples are to be taken and how often? Details.	3
4/ Is there any material to be added/mixed with the excavated clay to remain at the site?	4
5/ What remedies are going to be available for people like myself who are sensitive for the air quality (respiratory system sensitivities)? Details.	5
6/ What remedies will be available if the air quality is worse during the project than presented in MND? Who should be held legally responsible for that? Names?	

B. Traffic:

Normal traffic will migrate from San Fernando Road to Laurel Cyn., and subsequently to Arleta Ave.

1/What will be the impact for Arleta Ave. between Van Nuys Blvd and Sheldon Str (traffic, exhaust fumes, road surface wear) during and after operations ?	6
2/ What will be the impact for I-5 between Van Nuys Blvd and I-5 & I-170 connection?	

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C. Calculation of the impact factors and mitigation:

Our community was informed that the project instead of 6 days a week x 8hrs, will be constructed using 5 days a week x 8 hrs. It sounds great but please let me know how this change affects calculation of the impact factors - as the MND has been prepared using 6 days x 8hrs. Specifically;

1/Will the project last longer than originally estimated 18 months? How long?

7

3/ Are there more trucks to be employed to haul the excavated sediment? How many, frequency?

4/ Is the quantity of excavated sediment to decrease? How much?

At least one of the above has to change and - depending on WHAT it's going to be - it will affect the quality of life in our neighborhood in different ways.

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D. Maintenance:

8

What mosquito control measures will be implemented at the spreading grounds when completed?

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E. Landscaping:

Why the project doesn't include a decent landscaping improvement at the site, so at least after it's completion, there is some visible benefit to the community which carried it's burden? How to get it included?

9

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I'll appreciate your response.

Respectfully,  
Maria Polonski

**Maria Polonski (Polonski)**

**February 24, 2016**

- Polonski-1      Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. An anticipated number of high wind days is not part of the air quality modeling methodology. The air quality model is based on the average conditions in the Project area. However, consistent with SCAQMD Rule 403, the LACFCD would require implementation, by the Contractor, of a High Wind Fugitive Dust Control Plan, that describes additional actions to be taken when winds are greater than 25 miles per hour.
- Polonski-2      Consistent with Rule 403, soils that have been disturbed would be stabilized, generally through covering with a tarp or other material, or applying a non-toxic soil stabilizer/dust suppressant that creates a crust on the surface to be resistant to wind erosion.
- Polonski-3      The way the community would be protected from fugitive dust emissions is through appropriate implementation of SCAQMD Rule 403. Specifically, the Contractor would be required to comply with the Rule 403, including additional requirements for large operations. This would include preparation of a Fugitive Dust Control Plan. However, as per standard operating procedures for the County, the Rule 403-compliant Fugitive Dust Control Plan will be prepared by the selected contractor. The Fugitive Dust Control Plan must be submitted for review and approval by the LACFCD before Project initiation.

Based on public comments, additional detail has been added to RR AQ-1 in the Recirculated MND regarding anticipated contractor requirements for management of fugitive dust on the spreading grounds and within the haul trucks under Rule 403. In addition to a Fugitive Dust Control Plan, Contractor compliance with Rule 403 requirements would include, but not be limited to:

- A Dust Control Supervisor, that possesses a current certification from SCAQMD, would be designated. The Dust Control Supervisor would be responsible for preparing the Dust Control Plan.
- Signage, meeting the standards of the Rule 403 Implementation Handbook, would be installed around the Project site prior to initiating any sediment removal activities. The signage would provide an appropriate contact person(s) and phone number(s) to call with dust-related complaints and the phone number of the SCAQMD compliance office. The signage would remain and be maintained for the length of the Project.
- Daily inspections would be conducted by the Dust Control Supervisor, and specific dust control actions would be documented on the SCAQMD Inspections form from the Rule 403 Implementation Handbook.
- Watering exposed surfaces at least three times per day or more during windy conditions. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour.
- Fugitive dust would be controlled during after-hours through the implementation of Best Available Control Measures (BACM) identified in SCAQMD Rule 403 and the Fugitive Dust Control Plan. Non-toxic soil



stabilizers/dust suppressants, resistant to wind erosion, that create a crust on the surface may be selected and applied consistent with Rule 403.

- Traffic speeds on unpaved roads would be restricted to no more than 15 miles per hour.
- One or more devices would be installed at ingress/egress points to remove dirt from vehicle tires and undercarriage prior to leaving the site.
- All materials to be loaded for export would be pre-watered.
- All haul trucks would be covered (with on board tarp).

Based on public comments on the Recirculated MND, the Contractor specifications for Rule 403 compliance shall state that all haul trucks will be covered with an on-board tarp. The alternate means of limiting dust generation from trucks of maintaining two feet or more of freeboard will not be an option. The text of RR AQ-1 has been edited accordingly in Section 4.0, Clarifications, of this document.

Even with compliance with Rule 403, based on the evaluation of the revised Project schedule and haul routes, a new significant impact related to local (but not regional) emissions of particulate matter with a diameter of 10 microns or less (PM10) – a class of fugitive dust – was identified. Therefore, the Recirculated MND includes two new mitigation measures (MMs) to reduce criteria pollutant emissions, as presented below. MM AQ-1 requires all off-road equipment greater than 50 horsepower operated on the Project site to meet Tier 4 Final emissions standards. While this is required to reduce regional emissions of nitrous oxides (NOx) to a less than significant level, it also serves to reduce PM10. MM AQ-2 requires that the tops of the central levees, which run in a northeast-southwest direction, are paved or surfaced with a Roadway Mat System that is no less effective than a paved road at controlling fugitive dust emissions. The pavement and/or mat system must be installed prior to the start of hauling activities. With implementation of MMs AQ-1 and AQ-2, dispersion modeling results included in the Recirculated MND show that local emissions of PM10 would be reduced to below the SCAQMD threshold, and therefore be less than significant with mitigation.

**MM AQ-1** The Los Angeles County Flood Control District (LACFCD) shall include in the Contractor specifications the requirement that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 Final emissions standards. To provide evidence that the equipment is the appropriate tier, it shall be registered with the California Air Resources Board and have a label detailing that the equipment meets Tier 4 emissions standards. This requirement shall be monitored by LACFCD's on-site Construction Inspector, when inspecting the site.

**MM AQ-2** Prior to the start of haul truck operations, the Los Angeles County Flood Control District (LACFCD) shall include in the Contractor specifications the requirement that the top of the central levee spanning the spreading grounds in a northeast-southwest direction be paved or a Roadway Mat System that is no less effective than a paved road at controlling fugitive dust emissions, be installed. In order to eliminate an adequate amount of unpaved surface to reduce dust emissions to a less than significant level, the paving or

Roadway Mat System shall be of sufficient length to cover the greater of either: (1) a minimum of 25 percent of the total off-road path length being utilized by the haul trucks within the spreading grounds; or (2) a minimum of 660 linear feet of the paving or Roadway Mat System. The paving or Roadway Mat System shall be routinely inspected and maintained by the Contractor as often as needed to ensure the integrity of the surface and eliminate fugitive dust emissions from the off-road segments with this treatment. The haul truck drivers shall be directed to drive on the paving or Roadway Mat System exclusively unless there is no feasible alternative. The condition and use of the paved/matted levee roads shall be monitored by LACFCD's on-site Construction Inspector when inspecting the site.

Because air quality emissions and health risk would be less than significant with implementation of MMs AQ-1 and AQ-2, ambient air monitoring stations on the site during construction activity is not required. However, all complaints made to the on-site contact, whose information will be placed on signage along the Project site, will be investigated. Further, based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM10; the requirements for this monitoring will be included in the Contractor specifications.

- Polonski-4      The new pipelines that are replacing the open channel would be backfilled with a portion of sediment excavated from the spreading basins to the existing ground level in the headworks area. The remaining approximately 1.37 million cubic yards to be excavated, including the clay layers underlying the spreading grounds, would be exported off-site for disposal.
- Polonski-5      Implementation of the Project would include installation and maintenance of signage around the site that provides an appropriate contact person(s) and phone number(s) to call with dust-related complaints as well as the phone number of the SCAQMD compliance office.
- Polonski-6      As with all projects involving construction traffic, it is possible that some drivers will divert to different streets to avoid the construction vehicles. However, the three haul routes and associated sediment transport are dispersed to both the northwest and the southeast, and there is a myriad of surface streets throughout the paths of all three haul routes. As such, it is unlikely that any one street would have a change in a traffic patterns that would cause an adverse effect. The LACFCD will perform a pre- and post-Project evaluation of the pavement on the haul routes.
- Polonski-7      The Project would be performed in maximum 8-hour days conducted within the hours of 9:00 AM to 5:30 PM, within the longer (14 hour) window allowed by City of Los Angeles standards, from Monday through Friday. The Project was planned to be completed in one phase lasting approximately 20 months, beginning in Spring 2021 with completion in 2023. The LACFCD is currently anticipating a Fall 2021 start date. Specific start and end months have not been defined and will be determined closer to the initiation of the Project, if approved. The total amount of soil to be excavated remains essentially the same, with approximately 1,377,977 cubic yards (cy), rather than 1,370,000 cy (1.37 million cubic yards), to be exported off-site for disposal, as discussed in Section 4.0.

As discussed on page 2-6 of the Recirculated MND, “Based on the revised schedule and disposal locations, the proposed Project would generate a total of 372 daily truck trip ends (186 inbound and 186 outbound) during a typical weekday using only 18-cy capacity haul trucks, plus 18 daily employee trip ends (390 trip ends total). This includes a total of 208 trip ends to the Vulcan pits on Modified Haul Route A and Haul Route B, and 164 trip ends to Sunshine Canyon Landfill on Haul Route C. Using solely 14-cy capacity trucks, the proposed Project would generate a total of 478 daily truck trip ends during a typical weekday, including 268 trip ends to the Vulcan pits and 210 trip ends to Sunshine Canyon Landfill, plus 18 employee trip ends (496 trip ends total). However, in reality, a combination of 14-cy and 18-cy capacity trucks would be used, resulting in between 372 and 478 total daily truck round trips, plus 18 employee round trips.”

However, subsequent to circulation of the Recirculated MND and as discussed further in Section 4.0, due to requirements and limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements, sediment export is estimated to result in a maximum of 476 trip ends (or 238 inbound and 238 outbound trips to the disposal facility and back), including 276 trip ends to and from the Cal-Mat pit and 200 trip ends to and from Sunshine Canyon Landfill. Additionally, due to the limitation of the sediment hauling and disposal conditions, the LACFCD has determined that the anticipated construction period will be extended from approximately 20 months up to a maximum of 36 months. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.

- Polonski-8 Long-term operation and maintenance of the Pacoima Spreading Grounds would be the same as the existing condition. Because the infiltration rate of the basins would be increased substantially with implementation of the Project, water diverted into the basins would seep into the ground faster than is currently seeping.
- Polonski-9 The addition of features requested by the community has been considered by the LACFCD and those determined to be feasible have been included in the Project: (1) a bike path along Pacoima Diversion Channel and (2) steel fencing along the public-facing perimeter of the spreading grounds, in addition to the perimeter segments discussed in the Recirculated MND. All features (e.g., fencing and bike path) added to the Project beyond the water conservation-related components, add to the total cost for the Project. There are limits on the available funding; all of which is via public funds (i.e., State bond measures, LACFCD, and LADWP). Also, landscaping requires additional construction for irrigation installation and appropriate maintenance, which is not within the scope of the Project at the current time. A multi-benefit project may be considered in the future to include public recreation and additional aesthetic enhancements. The LACFCD is looking forward to working with the community on future projects near the Pacoima Spreading Grounds facility.

**From:** Jim Read  
**Sent:** Thursday, February 25, 2016 8:34 AM  
**To:** DPW-SpreadingGrounds  
**Subject:** Pacoima Spreading Grounds Improvement Project

To whom it may concern:

Read

This email is written in response to the proposed Mitigated Negative Declaration (MND) for the above project, which responses are required to be lodged by close of business on February 25th 2016. The response contained within this email thus meets that requirement.

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The Mitigated Negative Declaration proposed for this project depends for its validity on two main planks, specifically:

1. An analysis of excavation and construction operations within the site and on the haul routes, and
2. On impact statements contained within the Air Quality, Greenhouse Gas Emissions and Health Risk Assessment and Risk Analysis attached to the MND as appendix A.

1

In both areas the reasoning, based on the data provided, is inadequate to support the declaration and, as such, this MND should either be reworked or discarded in favor of a full Environmental Impact Report. At best the MND contains numerous errors; at worst, it represents deliberate obfuscation and an attempt to mislead the local community.

Whichever the case, and the evidence points strongly toward the latter, this MND is unfit for purpose.

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Specifically:

The MND details a civil engineering project where 1.6 million cubic yards of spoil are excavated and removed over an eighteen month period using two excavators, two bulldozers, a shaking table and a small fleet of water tankers for dust suppression. There is no mention of the loaders required to upload the spoil into the haul trucks or the jackhammers required to demolish the existing concrete infrastructures (it is stated that one of the excavators will have a jackhammer capability but this is unlikely and, in any case, the excavator cannot be in two places at one time).

2

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From a civil engineering standpoint it is not even theoretically possible for these time and effort objectives to be met in that they are mutually exclusive. You can significantly overrun the timeline by limiting on-site equipment to this minimalist level or you can throw more equipment at the job, but no civil engineer would sign off on a long term programme such as this without adequate resources and inbuilt contingencies, both of which are glaringly absent from the MND. It would appear therefore that no civil engineers have provided operational inputs to this programme.

3

Given that the proposed operational plan is impossible to achieve, two scenarios come into play; either the timeline is stretched out to reflect the available capability or the excavation equipment upgraded to allow the eighteen month timeline a reasonable chance of being met. The former would encompass a second winter season and incur significant cost overruns as the project drags on well past the estimated completion date. The latter, more likely, scenario doubles or quadruples

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(Tujunga SG Project) the onsite emitters and thus blows the environmental impact calculations out of the window.

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3 cont.

In the prelude to the MND reviewers are cautioned to " ... focus on the sufficiency of the document in identifying and analyzing the potential impacts on the environment and ways in which the potentially significant effects of the Project are avoided or lessened".

From the above it is apparent that the document is underpinned by a demonstrably false premise with regard to timelines and excavation effort and, as such, has no validity and should be amended to resolve the time/effort conflict or withdrawn in favor of a programme plan exposed to the full rigor of an EIR.

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4

This MND fails to join up the dots. If the environmental motherhood and apple pie fluff is removed there is little if any reasoned analysis of the environmental impact on the communities surrounding this project. No doubt the inhabitants of Mission Hills, Arleta, Pacoima and Sun Valley are as concerned as the next person about global warming, green house gas emissions, CCR Title 24, part 11, and the rest of the padding. I'm sure they talk about little else. But their main concerns are not the esoteric but the pragmatic, not issues of state but genuine concerns about noise, dirt, dust and pollution.

Without going into long and detailed analysis of the shortcomings and overall "smoke and mirrors" effect of the modelling explanation, it is apparent that many input parameters have been chosen either for the convenience of the authors or to achieve the desired result. Either way, it does not stand up to the most casual scrutiny. Some examples:

5

The dominant feature in local atmospherics is the wind funnel created by the Newhall Pass. Met data from Whiteman and Van Nuys airports are readily available and reflect this influence, yet data from a station in Burbank, many miles removed, is preferred and then extended over a 12 hour period. Work is supposedly limited to 8 hours per day and, as this is a construction project, will start at 0700 each day other than in the most exceptional circumstances. Spreading the day over 12 hours does not represent the patronizing "worst case scenario" but quite the opposite. The combined effect of spurious met data and extended timeframe is to water down potential meteorological impact.

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Some of the various restrictions in parametric inputs to the models are noted in the text but accepted as somehow unfortunate, rather than rendering the model inadequate for purpose. One modelling package is restricted in terms of assessing impact to adjacent properties (25 meters minimum) and area (5 acres maximum). In the former case, inverse square law applies and a vector nuisance, such as noise or dust, would quadruple in intensity as the distance from receptor to source is halved. Many property lines fall well within the 25 meter minimum.

Having established the parameter bounds for one model, the MND then changes the emission source from a realistic 5 acres to 154 acres (no explanation for this figure), converts pounds-per-day into grams-per-second over a 12 hour period (reasons unknown - work is limited to an 8 hour day) and the resultant is then divided across the 154 acres. This is pure mumbo-jumbo and designed, successfully, to confuse the reader, be he a layman or a qualified civil engineer. It's all nonsense.

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For reasons presumably to do with population density, the project site is purportedly located in Los Angeles County where the density is around 1,450 inhabitants per square mile. Placing the site within the City of LA, where it belongs, brings the adjacent population density up to around 7,900 per square mile, five times the density of LA County. This is deliberately misleading and the parametric implications, which must be there, are left unstated.

7

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A further misleading definition, probably with further parametric implications for the models, is the change in zoning from "Open Space and Recreation" to "User Defined Industrial Land". The use of the phrase "User Defined" is commonly known as CYA and indicates a probable disagreement between the authors and the project sponsors, an argument that the authors appear to have lost. This does not speak to a rigorous and professional approach but more of an unquestioning acceptance of incorrect and misleading inputs from project sponsors. An example perhaps of The Golden Rules; He who has the gold makes the rules...

8

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Within this necessarily short response I have highlighted enough problems with this MND to render it completely unfit for purpose. It is badly presented, misleading and full of incorrect data, unsubstantiated conclusions and factual errors. I can not see how any respectable civil engineering company could or would enter into a meaningful contract with this fanciful and eminently challengeable MND hanging, like the Sword of Damocles, over their heads.

9

The local communities are more than well aware of the political shenanigans affecting the inhabitants of Flint and Porter Ranch. They are not opposed to the project per se but deserve a full and reasoned explanation in plain language of the work involved and the efforts to be made in mitigation of the noise, dirt and disruption caused.

This MND fails in its totality to provide that explanation With respect,

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James Read



**Jim Read (Read)**

**February 25, 2016**

Read-1 Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. Under CEQA, an EIR is required when there would be impacts that would not be avoided or reduced to a less than significant level with project changes or with mitigation measures (Section 15064(a)(1) of the State CEQA Guidelines). The 2016 MND and the Recirculated MND acknowledges the Project would result in increased air emissions and noise and quantifies these increases to compare to the quantitative thresholds for these environmental topics (i.e., air quality, noise). As discussed in the 2016 MND and affirmed by the additional technical studies prepared based on the redefined haul routes in the Recirculated MND, there would be no significant impacts after changes to the Project and/or implementation of mitigation measures. Therefore, an MND is the appropriate CEQA documentation for the Project. The 2016 MND and the Recirculated MND were prepared and distributed in compliance with all applicable requirements of CEQA and the State CEQA Guidelines.

As a separate endeavor, the LACFCD has performed a technical evaluation of alternative haul routes and a reduced schedule based on public comments received on the 2016 MND. This involved additional traffic analysis and revised air quality, greenhouse gas, health risk assessment, and noise analyses to determine the relative effects on these environmental issues compared to the haul routes addressed in the 2016 MND. In light of the studies prepared and the analyses conducted, the conclusions in the 2016 MND and the Recirculated MND are sound and adequate in compliance with the State CEQA Guidelines.

Read-2 Air quality emissions were modeled for four different sources: on-site equipment, worker trips, demolition truck trips, and haul truck trips. The types and quantities of on-site construction equipment used in air quality modeling with CalEEMod for criteria pollutants is intended to represent a reasonable worst-case scenario of continuous activity (over eight hours) with a combination of equipment that could occur all at one time, to estimate the maximum daily emissions. Vehicle trips are modeled based on the actual number of trips that would occur if construction activity were evenly divided over the course of the Project, or the same every day. The modeling parameters are not meant to be a specific day-to-day prescription for equipment. In reality, the combination of equipment and intensity of activity varies on construction sites on a daily level but would be within the parameters of the maximum emissions. Regarding loaders, excavators can serve to load the haul trucks.

Read-3 Based on public comments received on the 2016 MND, the construction schedule for the Project was adjusted from 8-hour workdays conducted within the hours of 7:00 AM to 7:00 PM on Monday–Friday and 8:00 AM to 5:00 PM on Saturday over a period of approximately 18 months, to a maximum 8-hour workday conducted within the hours of 9:00 AM to 5:30 PM, Monday–Friday, with elimination of Saturday work, over a period of approximately 20 months. With this schedule adjustment, the Monday-Friday workday schedule is condensed (i.e. starting later and ending earlier) and would not involve weekend work. The LACFCD has performed a technical evaluation of alternative haul routes and a reduced schedule based on public comments received on the 2016 MND. This involved additional

traffic analysis; a revised air quality, greenhouse gas, health risk assessment (Appendix A of the Recirculated MND); and a revised noise analyses (Appendix E of the Recirculated MND) to determine the relative effects on these environmental issues compared to the haul routes addressed in the 2016 MND. These revised analyses concluded there would be less than significant air quality impacts with mitigation; less than significant greenhouse gas emissions without mitigation; and less than significant noise impacts with mitigation.

However, subsequent to circulation of the Recirculated MND, and as discussed further in Section 4.0, the LACFCD has determined that the anticipated construction period will be extended from approximately 20 months up to a maximum of 36 months. This extension is primarily as a result of limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary. Please also refer to Response Read-2, above.

Read-4 Please refer to Responses Read-1 and Read-3, above. As discussed, the timelines and excavation effort were revised to reflect changes in sediment disposal location as well as public feedback on Project parameters. In light of the studies prepared and the analyses conducted, the conclusions in the 2016 MND and the Recirculated MND are sound and adequate in compliance with the State CEQA Guidelines. Further, because all potential impacts would be reduced to a less than significant level with mitigation, an MND remains the appropriate CEQA documentation.

Read-5 The CalEEMod data sheets referenced in the comment indicate application of Climate Zone 12, which represents the climate/meteorological conditions found in zip code 91352 (the zip code of the community of Sun Valley in the City of Los Angeles). Climate Zones in CalEEMod are selected in addition to the climate defaults and are looked up by zip code. Therefore, the climate data used is relevant to the Project area as well as being consistent with California Air Resource Board (CARB) methodology for CalEEMod. Regarding air monitoring stations, similar to application of the appropriate Climate Zone, while there are meteorological stations throughout southern California, SCAQMD-designated stations are those acceptable for use in CalEEMod.

SCAQMD has divided the South Coast Air Basin into 38 air-monitoring areas with a designated ambient air monitoring station representative of each area. The Project site is located in air monitoring area 7, which is located in East San Fernando Valley and covers the area from the Hollywood Hills to San Fernando. The nearest air monitoring station to the Project site is the Burbank West Palm Avenue Monitoring Station (Burbank Station), which is located approximately six miles southeast of the Project site at 228 W. Palm Avenue, Burbank. Therefore, the Burbank Station is the appropriate air monitoring station to use in the air quality modeling for the Project. Please also refer to Response Read-2, above.

Read-6 The local air modeling was conducted according to the procedures detailed in Final Localized Significance Threshold Methodology, prepared by SCAQMD, July 2008. The Methodology states "It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the

nearest receptor should use the LSTs for receptors located at 25 meters.” As such, the use of the 25 meter or 82 feet distance follows the Methodology provided by SCAQMD. The placement of the emissions sources as six separate point sources around the perimeter of the Project site was chosen in order to provide a reasonable worst-case estimate of emissions created from the Project site. The modeling of regional emissions, a separate method than used for local emissions, is based on the larger area to be disturbed.

- Read-7      Page 2-1 of the 2016 MND and the Recirculated MND state “The Project site is the approximate 169-acres, County-owned Pacoima Spreading Grounds located in the City of Los Angeles...”. The CalEEMod data sheets from Appendix A of the 2016 IS/MND show application of Climate Zone 12, which represents the climate/meteorological conditions found in zip code 91352 (the zip code of the community of Sun Valley in the City of Los Angeles). Climate Zones in CalEEMod are selected in addition to the climate defaults and are looked up by zip code and have a header on the data sheet of “Los Angeles-South Coast County”. If this was the reference to Los Angeles County in the comment, it is an artifact of the CalEEMod model. No deliberate attempt to obfuscate the analysis was made in either the 2016 MND or the Recirculated MND.
- Read-8      The land use categories in CalEEMod represent the proposed action, rather than the existing land use at the location of a project. For the Project, the category of “User Defined Industrial” was selected as it is the most accurate representation of the Project’s activity. Also, among the Industrial category of land uses in CalEEMod, User Defined Industrial was selected as it provides the most flexibility in model parameters and ability to change defaults to most accurately represent what is projected to occur onsite.
- Read-9      Please refer to Responses Read-1 through Read-8, above.

**From:** Cindy Robles  
**Sent:** Saturday, February 20, 2016 12:45 PM  
**To:** DPW-SpreadingGrounds <SpreadingGrounds@dpw.lacounty.gov>  
**Subject:** Pacoima Spreading Grounds Improvement Project

**Robles**

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This is a response to the Pacoima Spreading Grounds (PSG) Improvement Project Mitigated Negative Declaration (MND).

1

Our family has several concerns, especially as our home shares a property line with the PSG and our health and well-being will be impacted by this project.

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In the MND, sensitive receptors were referred to, but no explanation was given as to of how the measurements were derived. Our house is 24 feet from our property line, but our understanding based on Rule 403 and 402, is that property lines are the measurement. Please explain in detail how the distances were calculated, from where to where, and why the receptors are at different measurements throughout the MND.

2

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Please explain why you used the LST lookup table for five acres and 25 meters when the SCAQMD specifically states when a project is larger than five acres, not to, and instead ([http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds\\_](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds_)), "in the event that the project area exceeds five acres, it is recommended that lead agencies perform project-specific air quality modeling for these larger projects."?

3

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Idling. The test referred to in the MND was done in the center of the spreading grounds on both sides of Devonshire St, using only 180 trucks idling, rather than the worst case 240. Why was this? Why choose the lesser amount of trucks at the greatest distance from shared property lines? This was not using best practice, which you state through the document is the case. The test created an ideal situation, rather than a realistic one. It does not give a true test of the impact for those living next to the grounds.

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There was no measurement taken specially with trucks idling on the perimeter close to homes/sensitive receptors. Please explain in detail why this was not done.

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What study was done with the construction equipment idling behind homes?

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As there was no study done, there should be no haul truck traffic behind homes, i.e., the perimeter road. This needs to be added to mitigation required. No idling within 250 feet of properties.

7

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Also stated was a 7.5 minutes idling time. How? Why was there no mention of the fact that California law does not allow queuing within 100 ft of a residence or the 5-minute idling limit? Both need to be put in the final MND. There should be no queuing or idling on the perimeter road as it is less than 25 feet from residential property lines.

8

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Also, please stipulate that there will no construction traffic or haul traffic on the perimeter road. Please add this to the required mitigation. Please give in detail, why you will not, if that is the case.

9

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Noise. It is stated that the noise will be 83 dB by our residences, above the 80 dB threshold. However, the report then makes a big assumption that the noise will not be continuous for 8 hours and chose the 90 dB threshold. If a bulldozer is going back and forth for 8 hours, it will create 8 hours of noise. Also,

10

where will the shaker be placed? There is no mention of not allowing the shaker near the perimeter area or within 250 feet of property lines/residences.	10 cont.
It looks patently like LA County wants to avoid the extra expense for a sound wall, and is disregarding the well-being of those who share a property line with the PSG. This is a nuisance that must be mitigated.	11
Choosing the 90 dB threshold, because the sound moves, shows to the community the utter disregard for the well-being those who live next to the spreading grounds To assume best case to save on having to put up a piece of plywood when the contractor works around this area? Do you really consider this best practices?	12
Finally, I left the LA County Flood Control community meeting on January 28th, with the understanding that the work would only be happening five days a week, 7 am to 3 pm. I do not see this in the MND. Is this true? Also, how many days will the project be contracted for?	13
The project manager, John Bodenchak, stated there would be a truck trip every six minutes. I do not see that in this report. Please explain. The trucks will be on Devonshire St. to Arleta Ave. and then Paxton St. before they go on the two routes. Is the six minutes measured from the Devonshire exit, or is it after split haul truck route? Will it be listed in the project specs? No more than a single haul truck every six minutes? If not, why not?	14
Thank you for answering all the questions. The community needs to have clarification and better mitigation.	15

Cynthia Robles

Please confirm receipt of this email.

**Cindy Robles (Robles)**

**February 20, 2016**

- Robles-1      Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged.
- Robles-2      The methodology used to measure the distances from the sensitive receptors is described in page 2-5 of the 2016 MND and page 3-10 of the Recirculated MND. The measurements are the shortest distance from the disturbance area on the Project site to the nearest structure (for residences and the church) and the nearest use area (for parks, as these have no structures). Disturbance refers to excavation, vehicle traffic, and other construction activity that would disturb the ground surface. It should be noted the nearest disturbance area is not necessarily the edge of the County-owned property. The Project would disturb most, but not all, of the site; there are areas around the perimeter of the spreading basins that would not be disturbed by Project implementation (page 3-10 of the Recirculated MND). Further, based on public feedback, the LACFCD would prohibit use of the perimeter road of the spreading grounds for truck loading. The distance is ascertained through measurement on aerial maps, such as Google Earth, and is considered accurate and adequate for purposes of modeling air and noise effects of a project. It is correct the SCAQMD Rule 403 refers to property lines; however, it is referring to the location at which visible dust is not permitted and can create a nuisance (SCAQMD Rule 402). Accordingly, the distance from the disturbance area to the nearest structure (for residences) is an accurate measurement for purposes of modeling the impacts of the anticipated activities on site.
- Robles-3      The local air modeling was conducted according to the procedures detailed in Final Localized Significance Threshold Methodology, prepared by SCAQMD, dated July 2008. The Methodology states “It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.” As such, the use of the 25 meter or 82 feet distance follows the Methodology provided by SCAQMD. The placement of the emissions sources as six separate point sources around the perimeter of the Project site was chosen in order to provide a reasonable worst-case estimate of emissions created from the Project site. With regard to the disturbance area of five acres, as discussed on page 3-19 of the Recirculated MND, this first step in the LST process is to establish screening-level emission thresholds. This was performed consistent with SCAQMD’s LST methodology, as discussed above in this response. Based on the first step, Project-specific dispersion modeling was performed. Specifically, on page 3-19 it states “As shown [in Table 3-5], localized emissions for NOx, CO, and PM2.5 would not exceed their respective SCAQMD screening-level LSTs, and emissions of PM10 would exceed its screening-level LST and therefore require detailed analysis in the form of dispersion modeling, discussed below. It should be noted that an exceedance of screening threshold only means that additional localized dispersion analysis is necessary and does not represent an occurrence of a localized significant impact. This is the second step in the LST process, if determined necessary through completion of the first step (i.e., screening).” The methodology and results of the fugitive dust dispersion modeling to ascertain the Project-specific local emissions impacts is discussed beginning on page 3-20 of the Recirculated MND. This analysis determined that there would be a significant



local fugitive dust emissions impact, but implementation of mitigation measures (MMs) AQ-1 and AQ-2, already required for regional emissions, would reduce local emissions adequately to be below the SCAQMD's local significant threshold value.

- Robles-4      The Health Risk Assessment used dispersion modeling (with AEROMOD) based on situating point and line sources to represent a reasonable worst-case scenario and is not meant to be a literal description of each emissions source and each receptor. For the on-site truck idling point sources used in the dispersion modeling (with AERMOD) for the health risk assessment, these were centrally located in the two halves of the spreading basins to represent the averaged location of all idling emissions. For number of trucks idling, half of 360 (i.e., 180, now 372) 18-cubic yard trucks were modeled as idling on the spreading basins all at one time for 7.5 minutes. The larger trucks have greater emissions per truck, and half the trucks were modeled as the other half would be on-road delivering soil to the pits. Also, idling for 7.5 minutes is an overestimation as the SCAQMD restricts idling to 5 minutes. The location of the haul truck loading on the site would be constantly changing and use of the perimeter road for truck loading would be prohibited. As such, the on-site diesel truck travel was modeled by using two separate line volume sources (one each on the north and south sides of Devonshire Street within the spreading grounds). Finally, Section 3-12.1.4 of the contract's special provisions shall restrict idling to less than five minutes per Title 13, CCR, Section 2485. In addition, all trucks shall be prohibited from idling within 100 feet from any residential area and idling at schools. Signs shall be posted at all Project site entrances/exits and loading areas. As such, the dispersion modeling for health risk estimated a worst-case, and likely overestimated, level of emissions.
- Robles-5      Please refer to Response Robles-4, above. Regarding on-site equipment identified in the air quality modeling parameters, air quality emissions were modeled for four different sources: on-site equipment, worker trips, demolition truck trips, and haul truck trips. The types and quantities of on-site construction equipment used in air quality modeling with CalEEMod for criteria pollutants is intended to represent a reasonable worst-case scenario of continuous activity (over eight hours) with a combination of equipment that could occur all at one time, to estimate the maximum daily emissions. Vehicle trips are modeled based on the actual number of trips that would occur if construction activity were evenly divided over the course of the Project, or the same every day. The modeling parameters are not meant to be a specific day-to-day prescription for equipment. In reality, the combination of equipment and intensity of activity varies on construction sites on a daily level but would be within the parameters of the maximum emissions estimated for the Project (refer to Table 3-4 in the Recirculated MND). The air quality modeling parameters are intended to be the typical or likely combination of emissions sources, and not a prescription for equipment or the locations of equipment. As discussed in Response Robles-1, above, the "proposed improvements would disturb most but not all of the property, as there are areas around the perimeter of the spreading basins that would not be disturbed." As such, modeling of emissions from truck idling and other construction activities on the perimeter road was not included in the 2016 MND or the Recirculated MND, as it would not represent a reasonable scenario.
- Robles-6      Please refer to Response Robles-5, above.
- Robles-7      Please refer to Response Robles-5, above. Also, as stated beginning on page 3-10 of the Recirculated MND, "Consistent with Title 13 of the *California Code of*

Regulations Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, where the perimeter road is 100 feet or less from a home, there must not be any vehicle queuing activity with idling lasting more than five minutes.” Also, Section 3-12.1.4 of the contract special provisions shall restrict idling to less than five minutes per Title 13, CCR, Section 2485. In addition, all trucks shall be prohibited from idling within 100 feet from any residential area and idling at schools. Signs shall be posted at all Project site entrances/exits and loading areas.

Limiting of any activity within 250 feet of residential property, assumed to mean the shared property line, would be a prohibitive constraint on the Project based on the location of some of the basins and necessary excavation to improve the water conservation at the facility. The LACFCD recognizes that proximity is an issue, and, as discussed in the Recirculated MND, would prohibit use of the perimeter road of the spreading grounds for truck loading. The Revised Air Quality, Greenhouse Gas, and Health Risk Assessment Report, updated to reflect the redefined haul routes and schedule, has determined that surrounding receptors would not be significantly impacted by Project implementation, based on the SCAQMD thresholds.

- Robles-8. As stated on page 3-23 of the Recirculated MND “...idling for 7.5 minutes is an overestimation, as the SCAQMD restricts idling to 5 minutes.” This was intended to capture engine activity at more than one location within the Project site per one-way trip and was one of the assumptions applied to generate highly conservative air and noise analyses. Please also refer to Responses Robles-4 and Robles-7, above.
- Robles-9 Based on public feedback, the LACFCD would prohibit use of the perimeter road of the spreading grounds for truck loading. Please also refer to Response Robles-1, above.
- Robles-10 The inherent nature of the proposed activities in the spreading basins result in the construction equipment moving around, as well as stopping and starting, within a localized area (e.g., part of one basin) for a period of time, and then another, and eventually moving over the entirety of the spreading grounds, which are quite large. Therefore, the volume of construction noise would be highly variable over each hour and each day at each receptor. The 2016 MND and Recirculated MND do not state that noise generation from the spreading grounds would not be continuous for eight hours. The analysis reflects that there would not be a steady state, or constant, equivalent noise level for that period of time. Whereas in the headworks area, construction activity would be confined to only the existing channel area and all noise generation would emanate from within a narrow geographic area. Hence the more restrictive noise level standard (80 dBA) was applied for this area of the Project site, rather than applying one standard for all areas. It is also noted that the modeled noise levels generally overestimate the actual noise levels that would be experienced and represent the highest noise level at the closest point to a receptor based on the expected construction scenario. As such, all noise levels further from a receptor would be less than the estimated noise level. Noise attenuates (lessens) at a rate of approximately 6 dBA per doubling of distance over a hard surface; the noise attenuation rate is greater over a soft surface such as soils. For the reasons discussed above, the thresholds applied are appropriate to the circumstances of the Project.

As discussed in Section 3.12, the noise model incorporates several additional conservative assumptions, including (1) hard terrain on the site, whereas the site is comprised of primarily soft terrain (i.e., dirt), which provides relatively lower noise levels; (2) direct line of sight between the noise source and receptor (i.e., no barriers); and (3) stationary operation of each piece of equipment for a period of one hour, with the nearest equipment being a dozer. In reality, the on-site construction activity is not expected to be stationary for an hour. Also, the majority of the spreading basin excavation and channel replacement would occur at a further distance than the nearest point on the site and be below the grade of the surrounding receptors (e.g., at a lower level), thereby providing noise reduction when compared to the noise modeling results.

The description of air quality modeling inputs on page 3-12 of the 2016 MND and page 3-17 of the Recirculated MND states, "This analysis assumes that on-site equipment would consist of the simultaneous operation of two bulldozers, two excavators, one sediment shaker/sifter, three water trucks, and one street sweeper." The sifter would not be used for all soil excavated, only for that planned for backfill at the headworks to ensure it meets engineering specifications. Please refer to Response Robles-7, above, regarding the 250-foot setback for construction activities.

Finally, mitigation (MM NOI-1) was required to build a sound wall to reduce a noise impact along the headworks prior to construction activity in this area (refer to pages 3-72 and 3-73 of the Recirculated MND). Based on public feedback, the LACFCD has opted to also install the sound wall along the private-facing perimeter (i.e., where the spreading basins abut private land uses). The sound wall would be at least eight feet high and would be installed prior to construction activities. As stated on page 3-72 of the Recirculated MND, a sound wall that is tall enough to break the line-of-sight between the proposed equipment and receiver would provide approximately 7 dB of noise reduction."

Robles-11 Please refer to Response Robles-10, above.

Robles-12 Please refer to Response Robles-10, above.

Robles-13 It is noted that the 2016 MND addressed a Monday through Saturday schedule. The construction schedule discussed at the 2016 community meeting was inadvertently a five-day-a-week schedule. Based on public comments received on the 2016 MND, the construction schedule for the Project was adjusted from 8-hour workdays conducted within the hours of 7:00 AM to 7:00 PM on Monday–Friday and 8:00 AM to 5:00 PM on Saturday over a period of approximately 18 months, to a maximum 8-hour workday conducted within the hours of 9:00 AM to 5:30 PM, Monday–Friday, with elimination of Saturday work, over a period of approximately 20 months. With this schedule adjustment, the Monday-Friday workday schedule is condensed (i.e. starting later and ending earlier) and would not involve weekend work.

However, subsequent to circulation of the Recirculated MND and as discussed further in Section 4.0, the LACFCD has determined that the anticipated construction period will be extended from approximately 20 months up to a maximum of 36 months. This extension is primarily as a result of limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements. As discussed in Section 4.0 and consistent with Section

15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.

- Robles-14      The statement of six truck trips per minute was not in the 2016 MND. It was intended to provide context for the rate of haul truck activity. As discussed on page 2-6 of the Recirculated MND, “Based on the revised schedule and disposal locations, the proposed Project would generate a total of 372 daily truck trip ends (186 inbound and 186 outbound) during a typical weekday using only 18-cy capacity haul trucks, plus 18 daily employee trip ends (390 trip ends total). This includes a total of 208 trip ends to the Vulcan pits on Modified Haul Route A and Haul Route B, and 164 trip ends to Sunshine Canyon Landfill on Haul Route C. Using solely 14-cy capacity trucks, the proposed Project would generate a total of 478 daily truck trip ends during a typical weekday, including 268 trip ends to the Vulcan pits and 210 trip ends to Sunshine Canyon Landfill, plus 18 employee trip ends (496 trip ends total). However, in reality, a combination of 14-cy and 18-cy capacity trucks would be used, resulting in between 372 and 478 total daily truck round trips, plus 18 employee round trips.” Not including employee trips, this equates to a range of 23 to 30 haul trucks per hour (i.e.,  $372/2 = 186/8 = 23.25$ ;  $478/2 = 239/8 = 29.875$ ) being loaded and outbound from the site, leaving either via Devonshire Street or Arleta Avenue, dependent on the disposal location.

However, subsequent to circulation of the Recirculated MND and as discussed in Section 4.0, Clarifications, of this document, due to requirements and limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements, sediment export is estimated to result in a maximum of 476 trip ends (or 238 inbound and 238 outbound trips to the disposal facility and back), including 276 trip ends to and from the Cal-Mat pit and 200 trip ends to and from Sunshine Canyon Landfill. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.

- Robles-15      This comment is acknowledged.

From: juan salas  
Sent: Thursday, February 25, 2016 8:12 AM  
To: DPW-SpreadingGrounds  
Subject: pacoima spreading grounds improvement project

Hello,

**Salas1**

Attached are my questions and comments. Feel free to reply to this email if you have any questions. Thank you

Juan Salas

To whom it may concern,

This is my letter of questions and comments regarding the Pacoima Spreading Grounds Improvement Project. I will try and keep them as clear and concise as possible. I've numbered them to (hopefully make them easier to read).

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| 1. Why is there no backup plan? The project itself looks like its going to be rushed to meet the 18 month time frame, but how come there is no backup plan in case of rain, high winds, fires etc.??           | 1 |
| 2. I heard in one of the meetings that there will be a sifter that will sift the dirt before it gets transported away. How come there is no mention of this in the report?                                     | 2 |
| 3. How come there is no specific mention of the trucks idling? I know that there is going to be a truck every 5 minutes, but how many and for how long will the other trucks behind the first truck be idling? | 3 |
| 4. The report says that there is no wild life. However, just one drive during my lunch break showed me various animals on site, including what appears to be ducks:  | 4 |
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| 5. Can we please see an actual plan of where all of the machinery will be placed?<br>Can we receive a plan as to how this project will begin and end? | 5 |
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| 6. Is there a conflict of interest where the county of Los Angeles conducted the MND and he county is also paying for this project? Why couldn't a neutral party conduct the study? | 6 |
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| 7. The engineer at one of the meetings said the project will only be 8 hours a day, then why is the MND mentioning a 12 hour workday? | 7 |
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| 8. How will the traffic be controlled? Has a traffic study and projection been planned? | 8 |
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| 9. How come there is mention of where the trucks will enter and xit on the MND? | 9 |
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| 10. Why is there no mention of the chemicals from fire suppressants from upstream not being mentioned in the MND? Did they not appear in the original report? | 10 |
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| 11. My most pressing question is: why cant the project be broken down into smaller projects? The MND states they will lose 1 rainy season with this project. However, if the project is broken down into 5 (or more) smaller projects, this will have zero rainy seasons lost as well as less trucks, as well as less dust in the air, and less trucks on the road. Basically everybody wins on this (including our plants and wildlife). | 11 |
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12. I noticed that there will be a bike lane, but nothing more. As far as Ive noticed in other projects in more affluent areas, there are numerous improvements to the residents that live in the immediate area. A bike lane is nice, but it becomes dangerous with no added street lighting. Why cant we have something similar to what is in the Silver Lake reservoir; where they have walking paths, parklets, and even a dog park.	12
13. The engineer and the report both mention some new gates being installed. Why are they only installed on one side of the road? Why cant he project have these new gates around the entire site?	
14. Was Cal Trans involved in the MND? If they were, why is there no mention of them? If they weren't, why weren't they involved with this project?	13
15. Why is there no mention of fugitive dust? A simple Google search led me to information from California's Air Resource Board, which teaches you of the different forms of fugitive dust. Based off that information, this project has many fugitive dust causing issues: trucks, idling trucks, unpaved roads, exposed ground, and sifters. Not on mention of fugitive dust is mentioned. Why?	14

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**Juan Salas (Salas1)**

**February 25, 2016**

Salas1-1 Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. Based on public comments received on the 2016 MND, the construction schedule for the Project was adjusted from 8-hour workdays conducted within the hours of 7:00 AM to 7:00 PM on Monday–Friday and 8:00 AM to 5:00 PM on Saturday over a period of approximately 18 months, to a maximum 8-hour workday conducted within the hours of 9:00 AM to 5:30 PM, Monday–Friday, with elimination of Saturday work, over a period of approximately 20 months. With this schedule adjustment, the Monday-Friday workday schedule is condensed (i.e. starting later and ending earlier) and would not involve weekend work.

As is the case with construction projects of all kinds, there are contingencies in place for inclement weather, whether that be rain, high winds, intense heat, or other conditions. The precise details of these contingencies would be determined as part of the contracting process and would also be decided on a case-by-case basis to protect both the construction workers and the surrounding community.

Also, subsequent to circulation of the Recirculated MND and discussed further in Section 4.0, the LACFCD has determined that the anticipated construction period will be extended from approximately 20 months up to a maximum of 36 months primarily as a result of limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements. This time period includes the anticipated “non-working” days. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.

Salas1-2 The description of air quality modeling inputs on page 3-12 of the 2016 MND and page 3-17 of the Recirculated MND states, “This analysis assumes that on-site equipment would consist of the simultaneous operation of two bulldozers, two excavators, one sediment shaker/sifter, three water trucks, and one street sweeper.” The sifter would not be used for all soil excavated, only for that planned for backfill at the headworks to ensure it meets engineering specifications.

Salas1-3 Section 3.3, Air Quality, of the Recirculated MND describes the parameters used to assess the air emissions from truck idling. Projects that involve off-site export of soil involve idling trucks inherently. The Contractor specifications would require compliance with all applicable regulations, including Title 13 of the California Code of Regulations Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. Based on the regulations, where the perimeter road is 100 feet or less from a home, there must not be any vehicle queuing activity with idling lasting more than five minutes.

Salas1-4 The analysis of biological resources on page 3-23 of the 2016 MND and page 3-30 of the Recirculated MND refers to sensitive wildlife species, which includes federally- and/or State-listed Endangered or Threatened, Species of Concern, or otherwise sensitive, species. As stated, there is no potential for sensitive wildlife

species to be present on the site, rather than no potential for all wildlife, including ducks, as identified in the photo.

- Salas1-5 Construction parking and staging would be on-site, primarily within the headworks area. On-site equipment would move as the Project progresses; therefore, a plan of where machinery will be placed is not feasible. Construction mobilization and demobilization (beginning and end) would occur as is typical for most construction projects. All construction parking and staging would occur on County-owned property, primarily near the headworks area of the Project site. The modeling parameters are not meant to be a specific day-to-day prescription for equipment. In reality, the combination of equipment and intensity of activity varies on construction sites on a daily level but would be within the parameters of the maximum emissions. Regarding loaders, excavators can serve to load the haul trucks. It is noted that the type of off-road equipment modeled (e.g., dozer, loader, off-road truck) does not affect the air modeling results; the critical factors are the horsepower, load factors, and engine TIER level of the equipment operating. As such, the actual equipment used during construction of the Project may vary from the equipment assumptions described in the Recirculated MND for purposes of modeling and changing the type of equipment would not change the findings of the MND.
- Salas1-6 Under CEQA, the Lead Agency (LACFCD) is responsible for the preparation of the CEQA documentation and is required to exercise its independent judgment concerning the contents of the environmental document (Section 21082.1 of the CEQA Statute). An independent consultant, conducted the study (i.e., the 2016 MND and the Recirculated MND), and the LACFCD is required under CEQA to review the documentation provided by the consultant and use its independent judgment. There is no conflict of interest.
- Salas1-7 As stated on page 2-7 of the 2016 MND, "Although the City of Los Angeles permits construction activity from 7:00 AM to 9:00 PM Monday through Sunday, the LACFCD would plan to implement the Project using 8-hour days within the 12-hour period between 7:00 AM and 7:00 PM on Monday through Friday and 8:00 AM to 5:00 PM on Saturday (i.e., 6 days a week) with no activity on Sunday." The 2016 MND assessed an 8-hour work day. However, based on public comments received on the 2016 MND, the construction schedule for the Project was adjusted from 8-hour workdays conducted within the hours of 7:00 AM to 7:00 PM on Monday–Friday and 8:00 AM to 5:00 PM on Saturday over a period of approximately 18 months, to a maximum 8-hour workday conducted within the hours of 9:00 AM to 5:30 PM, Monday–Friday, with elimination of Saturday work, over a period of approximately 20 months. With this schedule adjustment, the Monday-Friday workday schedule is condensed (i.e. starting later and ending earlier) and would not involve weekend work.
- However, subsequent to circulation of the Recirculated MND and as discussed further in Section 4.0, the LACFCD has determined that the anticipated construction period will be extended from approximately 20 months up to a maximum of 36 months. This extension is primarily as a result of limitations at the disposal facilities that LACFCD became aware of during final negotiations on the disposal agreements. As discussed in Section 4.0 and consistent with Section 15073.5(c) of the State CEQA Guidelines, because there would be no change in the significance of any identified environmental impacts nor would new mitigation measures be required, recirculation of the Recirculated MND is not necessary.

- Salas1-8 As presented on page 3-83 of the Recirculated MND, pursuant to RR TRA-1, the LACFCD “requires the implementation of temporary traffic control measures in accordance with the *Standard Specifications for Public Works Construction* (Greenbook), which contains standards for traffic and access (i.e., maintenance of access, traffic control, and notification of emergency personnel). For construction activity within the street right-of-way, a traffic control plan would be prepared in accordance with the *Work Area Traffic Control Handbook* (WATCH Manual) and subject to approval prior to initiation of the right-of-way activities by the City of Los Angeles Department of Transportation.”
- Salas1-9 As discussed on page 2-6 of the 2016 MND, “The proposed haul routes would consist of the haul trucks traveling from the Project site on Paxton Street...” and continues with a complete description of the haul routes then proposed. The Recirculated MND describes a total of three haul routes.
- Modified Haul Route A is based on the SVANC letter, and would involve loaded trucks traveling eastbound on Devonshire Street (from the east side of the spreading grounds) and turning immediately north on Arleta Avenue, northeast on Paxton Street to access I-5 Southbound, and either (1) taking the Sheldon Street exit heading northwest on Laurel Canyon Boulevard and northeast on Branford Street to access the Boulevard Pit, or (2) taking the Penrose Street exit then heading southwest on Penrose Street, northwest on San Fernando Road, northeast on Tuxford Street, northwest on Glenoaks Boulevard to access the Cal-Mat Pit, or continuing further on Glenoaks Boulevard and making a right turn on Sheldon Street to access the Sheldon Pit. Empty trucks would either travel northeast on Branford Street from the Boulevard Pit then northwest on Glenoaks Boulevard, travel northwest on Glenoaks Boulevard from the Cal-Mat Pit, or travel southwest on Sheldon Street from the Sheldon Pit then northwest on Glenoaks Boulevard, northeast on Osborne Street and Foothill Boulevard to access I-210 Westbound, merging onto SR-118 Westbound, taking the San Fernando Road exit, making a right turn on Paxton Street heading southwest, southbound on Arleta Avenue and then on Devonshire Street into the spreading grounds.
- Haul Route B would involve loaded trucks traveling eastbound on Devonshire Street and turning immediately north on Arleta Avenue, turning northeast on Paxton Street, turning right onto San Fernando Road, and travelling southeast to either (1) turn southwest on Branford Street to access the Boulevard Pit or (2) turn northeast on Branford Street, then southeast on Glenoaks Boulevard and northeast on Sheldon Street to access either the Sheldon Pit or the Cal-Mat Pit. Empty trucks would retrace the same route to return to the spreading grounds.
- Haul Route C would involve loaded trucks traveling westbound on Devonshire Street to access I-405 Northbound and then merging onto I-5 Northbound, taking the Roxford Street exit heading southwest and turning immediately northwest on Sepulveda Boulevard, continuing northwest on San Fernando Road, and then turning left on Sunshine Canyon Road to access the Sunshine Canyon Landfill. Empty trucks would retrace the same route to return to the spreading grounds.
- Salas1-10 Soil sampling has been performed in the basins to meet the requirements of the Vulcan pits and Sunshine Canyon Landfill to accept the sediment as inert (i.e., non-hazardous) material, and the results of the laboratory testing were posted on the website maintained for the Project: <http://dpw.lacounty.gov/wrd/Projects/PacoimaSG/PSG-Basin-Soil-Sampling->

Results.pdf. The laboratory results were discussed in the Recirculated MND and provided in Appendix D-3. There were no constituents present in concentrations considered to be hazardous, as defined in federal and State regulations.

Salas1-11 Breaking the Project into several smaller segments would not be feasible nor environmentally beneficial in the long run as the start and stop a “new” construction Project would result in more effort, and therefore more trips, emissions, and other potential adverse effects. The length of the Project would be substantially extended, and the total cost of the Project would also be substantially greater. There are limits on the available funding; all of which is via public funds (i.e., State bond measures, LACFCD, and LADWP). Therefore, in light of this, implementing the Project in several segments would not necessarily result in reduced environmental impacts.

Salas1-12 The addition of features requested by the community has been considered by the LACFCD, and those determined to be feasible have been included in the Project: (1) a bike path along Pacoima Diversion Channel and (2) steel fencing along the public-facing perimeter of the spreading grounds, in addition to the perimeter segments discussed in the Recirculated MND. All features (e.g., fencing and bike path) added to the Project beyond the water conservation-related components, add to the total cost for the Project. There are limits on the available funding; all of which is via public funds (i.e., State bond measures, LACFCD, and LADWP).

Based on review of aerial photography, it appears that there are nine to ten street lights installed along Filmore Street between Woodman Avenue and Pacoima Wash. Also, as the east side of Filmore Street, across from the spreading grounds, is developed primarily with single-family homes, installing additional street lights would increase the level of nighttime lighting for the residents in the area. The Recirculated MND concludes there would be no increase in nighttime light and glare that would affect the surrounding uses. Additional public recreation features are not included in the proposed Project at this time and have not been evaluated in the Recirculated MND. A multi-benefit project may be considered in the future to include public recreation and additional aesthetic enhancements. the LACFCD is looking forward to working with the community on future projects near the Pacoima Spreading Grounds facility. Because this comment does not address the environmental analysis in the 2016 MND or Recirculated MND, no further response is required.

Salas1-13 Potential impacts to California Department of Transportation (Caltrans) facilities was addressed as part of the Traffic Impact Study consistent with City of Los Angeles Department of Transportation’s (LADOT’s) traffic study guidelines that are applied to operation of new, permanent land uses. In addition to performing intersection capacity utilization (ICU) analyses for affected freeway on- and off-ramps, the Traffic Impact Study performed a “Supplemental Caltrans Impact Analysis” (refer to page 3-94 of the 2016 MND and page 3-121 of the Recirculated MND) for both freeway mainline segments and ramp queuing. Caltrans was on the mailing list for the 2016 MND and the Recirculated MND and provided comment letters on both documents stating “Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities”. These comment letters are included in this document.

Salas1-14 Fugitive dust is the common term that refers collectively to PM10 and PM2.5 (particulate matter of two different sizes) and is a result of construction activity. Air



quality emissions were modeled for four different sources: on-site equipment, worker trips, demolition truck trips, and haul truck trips. The types and quantities of on-site construction equipment used in air quality modeling with CalEEMod for criteria pollutants is intended to represent a reasonable worst-case scenario of continuous activity (over eight hours) with a combination of equipment that could occur all at one time, to estimate the maximum daily emissions, including PM10 and PM2.5. Fugitive dust that may result from the Project is discussed in the 2016 MND, including but not limited to pages 3-11, 3-12, 3-14 (under heading “Fugitive Dust Dispersion Modeling”), 3-15, 3-48, and 3-100; and in the Recirculated MND, including but not limited to pages 3-13, 3-15 through 3-17, 3-20 through 3-22, 3-28, 3-59, 3-130, and 3-137.

1/21/2016

To Whom it May Concern:

**Shipe**

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Many years ago when the station fires were in progress, huge clouds of gritty dust came over the mountains and dusted everything. Before this, my husband was fine, but by the time the fires were over my husband developed a breathing condition that has no medical cure. Doctors have tried various drugs, but nothing works. It does get worse during the summer months. It is affected by environmental conditions because whenever he leaves this valley his condition improves considerably. I also have Asthma that is affected by my environment.

A couple of years ago when the construction of the small park on Arleta and Devonshire was in progress, gritty dust constantly covered our cars and everything else.

1

Compared to your current project, the building of the park was small and insignificant. I dread to think of huge quantities of gritty dust covering everything. Where the park only took months to build, this project will take over a year. To think that huge quantities of gritty dust affecting everything for well over a year is a little scary. Especially during the months the Santa Anas blow.

I know that your project is a done deal, but I hope that some compromises can be made that will protect the health of the community that will be affected by your project - A compromise that will limit the amount of dust that your project will create.

---

Thank you for your time and consideration of this request.

Wanda Shipe

Walter and Wanda Shipe

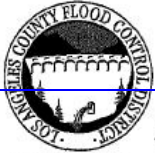
**Walter and Wanda Shipe (Shipe)**

**January 21, 2016**

Shipe-1      Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. It is acknowledged that not all construction sites properly or fully implement SCAQMD Rule 403; however, the LACFCD is committed to appropriately managing dust generation during the whole of the construction period, as discussed in Section 3.3, Air Quality, of the Recirculated MND. Additionally, implementation of the Project would include installation and maintenance of signage around the site that provides an appropriate contact person(s) and phone number(s) to call with dust-related complaints as well as the phone number of the SCAQMD compliance office. All feasible measures consistent with SCAQMD Rule 403 would be implemented throughout the Project to reduce fugitive dust. The LACFCD will also be implementing several additional, voluntary measures beyond Rule 403 compliance to reduce dust emissions.

## **2.4 PUBLIC MEETING COMMENT CARDS**

- Gary Aggas, President Sun Valley Area Neighborhood Council, January 28, 2016.
- Yolonda Anguiano, Project Manager to East San Fernando Valley Nature Parkway, January 28, 2016.
- Yahel Barredo, Franciso Deldago, and Elodia Tavarez, March 14, 2016.
- Kathy Grubert, January 28, 2016.
- Karen Martin, January 28, 2016.
- Mike O’Gara, January 28, 2016.
- Juan Salas, January 28, 2016.



Pacoima Spreading Grounds Improvement Project  
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7:00 PM

Aggas

I am in favor of the project but:

COMMENTS:

I worked with DWP on the Tujunga Spreading Grounds project. We convinced DWP to use Conveyer Belts instead of (most) truck trips. Have you considered Conveyer Belts?

1

You will be dumping dirt in the same pits (at the same time) in Sun Valley. Are you coordinating?

2

Name:

Gary Aggas, President, Sun Valley Area N.C.

Address:

E-Mail:

/ dd

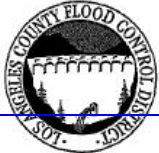
**Gary Aggas, President Sun Valley Area Neighborhood Council (Aggas)**

**January 28, 2016**

Aggas-1      Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is noted. The use of conveyor belts for the Project would not be feasible because of the much greater distance from the Pacoima Spreading Grounds to the disposal locations compared to Tujunga Spreading Grounds Enhancement Project.

Aggas-2      The timing of other LACFCD projects in the vicinity and the Tujunga Spreading Grounds Enhancement Project has been considered in the 2016 MND. Also, the LACFCD is coordinating with the Los Angeles Department of Water and Power (the CEQA Lead Agency for the Tujunga Spreading Grounds Enhancement Project) with regard to the scope and timing of the various water conservation projects planned to benefit the San Fernando Valley Groundwater Basin. At the time of preparation of the Recirculated MND, the Tujunga Spreading Grounds Enhancement Project was completed. As such, these two projects would not be dumping at the same sites at the same time.





COMMENTS:

Thank you for recognizing the ~~EAST~~ <sup>(ESFVNP)</sup> San Fernando Valley Nature Parkway as part of the landscape of the Pacoima Spreading Grounds. The ESFVNP aesthetically enhanced the landscape & provides a safe sidewalk for residents to walk/run/skate/Bike through Devonshire without a car to two parks (Devonwood & Arleta/Devonshire Park).

Please try to mitigate closure of The Nature Parkway AKA (ESFVNP) or destruction to the native plants & connecting parks. Please include The ESFVNP as part of The pre & post construction evaluation <sup>(survey)</sup> so that any plants can be replenished if harmed by the PSG project. Lastly also replace The chainlink fence on Fillmore because The families living on Fillmore do not to see trash trapped by The current fence.

Name: Yolanda Anguiano, Project manager to East SFV nature Parkway  
Address: \_\_\_\_\_  
E-Mail: \_\_\_\_\_

**Yolonda Anguiano, Project Manager to East San Fernando Valley Nature Parkway (Anguiano2)**

**January 28, 2016**

Anguiano2-1 Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. The addition of features requested by the community has been considered by the LACFCD and those determined to be feasible have been included in the Project: (1) a bike path along Pacoima Diversion Channel and (2) steel fencing along the public-facing perimeter of the spreading grounds, in addition to the perimeter segments discussed in the Recirculated MND. It should be noted that all features (e.g., fencing and bike path) added to the Project, beyond the water conservation-related components, add to the total cost for the Project. There are limits on the available funding; all of which is via public funds (i.e., State bond measures, LACFCD, and LADWP). A multi-benefit project may be considered in the future to include public recreation and additional aesthetic enhancements. The LACFCD is looking forward to working with the community on future projects near the Pacoima Spreading Grounds facility. Because this comment does not address the environmental analysis in the 2016 MND and Recirculated MND, no further response is required.



Pacoima Spreading Grounds Improvement Project  
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## COMMENTS:

→ Improve landscape on the area? Can you build a new bike path across the existent one?

Recreational enhancements; a new fence Is an insult to the intelligence of the community.

As we are located AIN 2648-010-011, most likely measurements to mitigate impacts won't be enough; proposed working hours totally conflict with the owner of the house whom works night shift and is a day sleeper (sleep hours from 6 am thru 2:pm). Another main concern is; we have a toddler 1 year and 10 months as of today and a 27 years old pregnant woman (9 months pregnant) living in the house. Besides calling the Dust Control Inspector ~~and there is one, that~~ How are noise and dust effects going to be mitigated at our house (consider is one house apart from the spreading grounds) and our family members will be protected before construction starts?

1

Name: Yahel Barredo, Francisco Delgado, Elodia Tavaréz

Address: \_\_\_\_\_

E-Mail: \_\_\_\_\_

**Yahel Barredo, Francisco Delgado, Elodia Tavaréz (Barredo)**

**March 15, 2016**

Barredo-1 Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged. The proposed Project currently includes a connection between the existing bike paths on Devonshire Street and Filmore Street on the east side of the basins. However, additional recreation and aesthetic enhancements in the Project area may be considered in the future. Additional public recreation features are not included in the proposed Project at this point and have not been evaluated in the Recirculated MND. A multi-benefit project may be considered in the future to include public recreation and additional aesthetic enhancements. the LACFCD is looking forward to working with the community on future projects near the Pacoima Spreading Grounds facility.

It is unclear which measurements, and which impacts, the commenter is referencing. However, as discussed in the Recirculated MND, the environmental analysis reviewed a worst-case scenario to ensure all potential impacts were captured and mitigated. A LACFCD construction inspector will be at the job site during construction activities and will enforce thresholds with regards to noise, dust, and air emissions. As the comment states no details as to the specific concerns with the environmental analysis, no changes to the Recirculated MND and no further response is required.

The Recirculated MND analysis of all topics, including traffic, noise, and air emissions from Project implementation is not based on temporal changes in the day-to-day population in the surrounding area. Each topic has been assessed as though the receptor(s) are present, in this case during the eight-hour work day, in both the 2016 MND and the Recirculated MND. As such, while the Recirculated MND disclosed there would be noise generated by construction activities, the noise levels at the nearest receptors were below the applicable threshold except at the headworks. Mitigation was proposed to build a sound wall along the headworks prior to construction activity in this area (refer to pages 3-72 and 3-73 of the Recirculated MND. Based on public feedback, the LACFCD has opted to also install the sound wall along the private-facing perimeter (i.e., where the spreading basins abut private land uses). As stated on page 3-72 of the Recirculated MND, "...a sound wall that is tall enough to break the line-of-sight between the proposed equipment and receiver would provide approximately 7 dB of noise reduction."

A LACFCD construction inspector will be at the job site during construction activities and will enforce thresholds with regards to noise and air emissions, including dust. The Recirculated MND determined that with implementation of the identified mitigation measures (MMs AQ-1 and AQ-2), in Section 5.0, Mitigation Monitoring and Reporting Program, which describes the mitigation program to be implemented by the LACFCD during construction of the proposed Project, there would be less than significant regional and local air emissions, including fugitive dust, and a less than significant health risk.



COMMENTS:

I don't see how potential air quality impacts will be mitigated- not specified in the EIR. Please explain the impacts on air quality from the sediment removal and other construction activities related to the project, as well as mitigating measures.

1

What is a "High Wind Fugitive Dust Plan"?

2

Name: Kathy Grubert

Address: |

E-Mail: |

**Kathy Grubert (Grubert)**

**January 28, 2016**

- Grubert-1      Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. The analysis of the impacts of air quality from Project implementation is presented in Section 3.3, Air Quality, beginning on page 3-7 of the 2016 MND and beginning on page 3-8 of the Recirculated MND. Pursuant to CEQA, mitigation measures are required when a significant impact is identified, meaning the effect has exceeded the applicable threshold. The Recirculated MND determined that even with compliance with Rule 403, based on the evaluation of the revised Project schedule and haul routes, a new significant impact related to local (but not regional) emissions of particulate matter with a diameter of 10 microns or less (PM10) – a class of fugitive dust – was identified. Therefore, the Recirculated MND includes two new mitigation measures (MMs) to reduce criteria pollutant emissions, as presented below. MM AQ-1 requires all off-road equipment greater than 50 horsepower operated on the Project site to meet Tier 4 Final emissions standards. While this is required to reduce regional emissions of nitrous oxides (NOx) to a less than significant level, it also serves to reduce PM10. MM AQ-2 requires that the tops of the central levees, which run in a northeast-southwest direction, be paved or surfaced with a Roadway Mat System that is no less effective than a paved road at controlling fugitive dust emissions. The pavement and/or mat system must be installed prior to the start of hauling activities. With implementation of MMs AQ-1 and AQ-2, dispersion modeling results included in the Recirculated MND show that local emissions of PM10 would be reduced to below the SCAQMD threshold, and therefore be less than significant with mitigation.
- Grubert-2      A High Wind Fugitive Dust Control Plan defines the additional and/or alternate actions the Contractor must take when wind speeds exceed 25 miles per hour and is part of the SCAQMD Rule 403 requirements for all projects.





spreading grounds @ dpw.lacounty.gov

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Martin

COMMENTS:

Please put the tubular fencing on BOTH sides of Devonshire Blvd!! It would look bad to have a nice fence on the south side of the street and chain link on the north side. It is one street. Please replace the oleander that died all along the Filmore Street <sup>fence</sup> 15 yrs ago which was never replaced. Woodman could use 6 more Deodar cedars between Lassen and Devonshire. If you give us the impression that our community will look better after this project, we would be more likely to get on board.

Name:

Karen Martin

Address: \_

E-Mail: \_

**Karen Martin (Martin)**

**January 28, 2016**

Martin-1      Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. The addition of features requested by the community has been considered by the LACFCD, and those determined to be feasible have been included in the Project: (1) a bike path along Pacoima Diversion Channel and (2) steel fencing along the public-facing perimeter of the spreading grounds, in addition to the perimeter segments discussed in the Recirculated MND. It should be noted that all features (e.g., fencing and bike path) added to the Project beyond the water conservation-related components, add to the total cost for the Project. There are limits on the available funding; all of which is via public funds (i.e., State Proposition 84 Grant, LACFCD, and LADWP). A multi-benefit project may be considered in the future to include public recreation and additional aesthetic enhancements. the LACFCD is looking forward to working with the community on future projects near the Pacoima Spreading Grounds facility.



COMMENTS:

Truck Route going up Sheldon St goes  
past THREE ~~HIGH~~ SCHOOLS  
1240 students SUN VALLEY HIGH SCHOOL SHELDON & TELFER  
600 students MILITARY CHARTER SCHOOL SITELDON & HADDON  
NEW SCHOOL presently under construction at Alleyberry &  
San Fernando Rd- open with 1000 students FALL 2016  
240 DIESEL TRUCKS RUNNING PAST these schools  
or 60% of 240 Trucks = 144 trucks per day  
polluting the lungs of about 2500 sensitive receptors  
NOT ACCEPTABLE

1

Name:

MIKE O'GARA

Address: \_\_\_\_\_

E-Mail: \_\_\_\_\_

**Mike O’Gara (O’Gara)**

**January 28, 2016**

O’Gara-1 Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. The LACFCD performed a technical evaluation of alternative haul routes based on the suggestions of the SVANC and other commenters. The Recirculated MND addressed three haul routes, including Modified Haul Route A that reflects Sun Valley Area Neighborhood Council comment letter, and new Haul Route C to Sunshine Canyon Landfill. Haul Route B would remain the same as presented in the 2016 MND. None of the proposed haul routes include side residential streets, defined as those streets serving almost exclusively traffic to and from individual residences. The proposed haul routes are detailed beginning on page 2-5 of the Recirculated MND and are illustrated on Exhibits 2-7 through 2-11.

Modified Haul Route A is based on the SVANC letter, and would involve loaded trucks traveling eastbound on Devonshire Street (from the east side of the spreading grounds) and turning immediately north on Arleta Avenue, northeast on Paxton Street to access I-5 Southbound, and either (1) taking the Sheldon Street exit heading northwest on Laurel Canyon Boulevard and northeast on Branford Street to access the Boulevard Pit, or (2) taking the Penrose Street exit then heading southwest on Penrose Street, northwest on San Fernando Road, northeast on Tuxford Street, northwest on Glenoaks Boulevard to access the Cal-Mat Pit, or continuing further on Glenoaks Boulevard and making a right turn on Sheldon Street to access the Sheldon Pit. Empty trucks would either travel northeast on Branford Street from the Boulevard Pit then northwest on Glenoaks Boulevard, travel northwest on Glenoaks Boulevard from the Cal-Mat Pit, or travel southwest on Sheldon Street from the Sheldon Pit then northwest on Glenoaks Boulevard, northeast on Osborne Street and Foothill Boulevard to access I-210 Westbound, merging onto SR-118 Westbound, taking the San Fernando Road exit, making a right turn on Paxton Street heading southwest, southbound on Arleta Avenue and then on Devonshire Street into the spreading grounds.

Haul Route B would involve loaded trucks traveling eastbound on Devonshire Street and turning immediately north on Arleta Avenue, turning northeast on Paxton Street, turning right onto San Fernando Road, and travelling southeast to either (1) turn southwest on Branford Street to access the Boulevard Pit or (2) turn northeast on Branford Street, then southeast on Glenoaks Boulevard and northeast on Sheldon Street to access either the Sheldon Pit or the Cal-Mat Pit. Empty trucks would retrace the same route to return to the spreading grounds.

Haul Route C would involve loaded trucks traveling westbound on Devonshire Street to access I-405 Northbound and then merging onto I-5 Northbound, taking the Roxford Street exit heading southwest and turning immediately northwest on Sepulveda Boulevard, continuing northwest on San Fernando Road, and then turning left on Sunshine Canyon Road to access the Sunshine Canyon Landfill. Empty trucks would retrace the same route to return to the spreading grounds.

The revisions to the haul routes, daily and weekly schedule, and disposal location involved additional traffic analysis; revised air quality, greenhouse gas, health risk assessment; and a revised noise analyses to determine the relative effects on these environmental issues compared to the haul routes addressed in the 2016

MND. These analyses determined there would be less than significant impacts related to air quality, including health risk at nearby sensitive receptors, with implementation of mitigation measures. While the nearest sensitive receptors are residential, church, and park land uses; the criteria pollutant emissions and health risk at distances further than the identified sensitive receptors would be less than that identified for the nearest receptors.

Also, as discussed beginning of page 3-54 in Section 3.8, Hazards and Hazardous Materials of the Recirculated MND, “There are no schools within ¼ mile of the Project site; however, there are schools within approximately ¼ mile of Modified Haul Route A, Haul Route B, and Haul Route C. These schools include (with the address and approximate distance between each school and the haul routes at the nearest points in parentheses):

- Sharp Avenue Elementary (13800 Pierce Street, Arleta) (0.1 mile)
- Bert Corona Charter School (9400 Remick Avenue, Arleta) (0.1 mile)
- Vena Avenue Elementary School (9377 Vena Avenue, Arleta) (0.1 mile)
- Montague Charter Academy (13000 Montague Street, Arleta) (0.15 mile)
- Mary Immaculate School (10390 Remick Avenue, Pacoima) (0.1 mile)
- Pacoima Middle School (9919 Laurel Canyon Boulevard, Pacoima) (adjacent to I-5)
- Sara Coughlin Elementary School (11035 Borden Avenue, Pacoima) (0.2 mile)
- Telfair Elementary School (10975 Telfair Avenue, Pacoima) (adjacent to Paxton Street)
- Fernangeles Elementary School (12001 Art Street, Sun Valley) (0.1 mile)
- Sun Valley High School (9171 Telfair Avenue, Sun Valley) (0.15 mile)
- Devonshire Montessori School (14941 Devonshire Street, Mission Hills) (adjacent to Devonshire Street)
- George K. Porter Middle School (15960 Kingsbury Street, Granada Hills) (0.25 mile)
- Haskell Elementary School (15850 Tulsa Street, Granada Hills) (0.25 mile)
- Danube Avenue Elementary School (11220 Danube Avenue, Granada Hills) (0.1 mile)

As discussed in Section 3.3, Air Quality, local and regional emissions of criteria air pollutants would be below all SCAQMD thresholds, and TAC emissions—namely diesel particulate matter from on-site construction equipment and the haul trucks—would not result in health risks to any sensitive receptors near the Project site or the three Vulcan pits proposed for sediment disposal. These locations represent the highest concentrations of TAC emissions, because of truck idling. Therefore, the emissions of TACs from the haul trucks during travel to and from the site and the pits would be lower than that quantified in the Health Risk Assessment (Appendix A) prepared for the Project. As such, construction of the Project would not involve emissions in quantities that could be considered hazardous in the vicinity of any school. There would be a less than significant impact and no

mitigation is required. Operation of the Project would not impact nearby schools due to hazardous emissions, because there would be no long-term changes to the regular inspection and maintenance operations that have occurred historically.” This is the same finding for this analysis presented in the 2016 MND.





COMMENTS:

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Salas2

- I would suggest you dedicate \$5 million to improve the  
aesthetics, ~~and~~ install plants, more lighting, etc..

1

- Can you make the project piece by piece to reduce the environmental  
impact.

2

Name:

Juan Salas

Address:

E-Mail:

<[redacted]>

**Juan Salas (Salas2)**

**January 28, 2016**

- Salas2-1      Thank you for submitting comments on the 2016 MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. The addition of features requested by the community has been considered by the LACFCD and those determined to be feasible have been included in the Project, including (1) a bike path along Pacoima Diversion Channel and (2) steel fencing along the public-facing perimeter of the spreading grounds, in addition to the perimeter segments discussed in the Recirculated MND. All features added to the Project beyond the water conservation-related features, such as additional fencing, landscaping, and lighting would add to the total cost for the Project. There are limits on the available funding, all of which is via public funds (i.e., State bond measures, LACFCD, and LADWP). A multi-benefit project may be considered in the future to include public recreation and additional aesthetic enhancements. the LACFCD is looking forward to working with the community on future projects near the Pacoima Spreading Grounds facility. Because this comment does not address the environmental analysis in the 2016 MND or the Recirculated MND, no further response is required.
- Salas2-2      As discussed in Response Salas1-11, above, breaking the Project into several smaller segments would not be feasible nor environmentally beneficial in the long run as the start and stop a “new” construction Project would result in more effort, and therefore more trips, emissions, and other potential adverse effects. The length of the Project would be substantially extended, and the total cost of the Project would also be substantially greater. There are limits on the available funding; all of which is via public funds (i.e., State bond measures, LACFCD, and LADWP). Therefore, in light of this, implementing the Project in several segments would not necessarily result in reduced environmental impacts.

## **SECTION 3.0 RESPONSES TO COMMENTS ON THE RECIRCULATED MND**

Letters commenting on the information and analysis in the Recirculated MND were received from the following parties during the public review period:

### **Agencies**

- State of California, Department of Fish and Wildlife, December 10, 2018.
- State of California, Department of Fish and Wildlife, December 27, 2018.
- State of California, Department of Transportation, December 13, 2018.
- Los Angeles County Metropolitan Transportation Authority, December 13, 2018.
- South Coast Air Quality Management District, December 12, 2018.

### **Organizations**

No organizations submitted comments on the Recirculated MND.

### **Individuals**

- Yolie Anguiano, November 27, 2018.
- Yolie Anguiano, December 4, 2018.
- Clarence Brown, December 31, 2018.
- Elizabeth Chou, November 21, 2018.
- Ricardo Diaz, November 30, 2018
- Elizabeth Marx, December 13, 2018.
- Susan Milne, December 13, 2018.
- Jesus Ramos, November 30, 2018.
- Robert Rouge, November 27, 2018.

### **Public Meeting Comment Cards**

- Yolonda Anguiano, Project Manager to East San Fernando Valley Nature Parkway, November 29, 2018.
- Raymond Duran, November 29, 2018.
- Araceli Hernandez, November 29, 2018.
- Jesse Ramos, November 29, 2018.
- Lokubanda Tillakaratne, November 29, 2018.
- Niranjala Tillakaratne, November 29, 2018.
- Justan Torres, November 29, 2018.

The LACFCD's responses to all comments are provided below. Each comment letter is provided first and is bracketed in the right margin, sequentially numbered (e.g., CDFW-1). Following the bracketed comment letter, the LACFCD's responses are presented in corresponding order to provide a matching numbered response on the pages following each comment letter.

Because some individuals provided comments on both the 2016 MND and the Recirculated MND, some individuals have the same last name, and/or some individuals have the same initials, to provide a unique identifier for each letter, the authors of all comment letters on the 2016 MND are abbreviated with last names and the authors of letters on the Recirculated MND are abbreviated

with two initials. If there was more than one letter from an individual or the same last name on different letters, the abbreviation was then augmented with a numeral. For instance, if two persons had the initials AB, these would be represented as AB1 and AB2 for the Recirculated MND responses. If two persons had the last name Smith, these would be represented as ASmith and BSmith. Similarly, for those agencies that submitted a comment letter on both documents, the traditionally used abbreviations for these agencies are augmented with a numeral. For instance, California Department of Fish and Game, traditionally abbreviated as CDFW, is represented as CDFW1 for the 2016 MND comment letter and CDFW2 for the Recirculated MND comment letter. In all occurrences, the comment letter with the matching abbreviation immediately precedes the responses.

### **3.1 STATE, REGIONAL, AND LOCAL AGENCIES**

- State of California, Department of Fish and Wildlife, December 10, 2018.
- State of California, Department of Fish and Wildlife, December 27, 2018.
- State of California, Department of Transportation, December 13, 2018.
- Los Angeles County Metropolitan Transportation Authority, December 13, 2018.
- South Coast Air Quality Management District, December 12, 2018.

**From:** Gibson, Steve@Wildlife  
**Sent:** Monday, December 10, 2018 8:44 AM  
**To:** DPW-SpreadingGrounds <SpreadingGrounds@dpw.lacounty.gov>  
**Subject:** Pacoima Spreading Grounds Improvement Project Recirculated MND Comment deadline

Hello,

**CDFW2**

I am reviewing the RMND for the Pacoima Spreading Grounds and I see a discrepancy for the deadline. The document states there will be a 45 day review period but has December 13 as the deadline. Since November 14th the document review period began, December 13<sup>th</sup> is only a 30 day comment period. Please clarify the error.

1

Thank you,

Steve Gibson  
Senior Environmental Scientist (Specialist)  
CA Dept. of Fish and Wildlife  
4665 Lampson Ave. suite C  
Los Alamitos, CA 90720



**State of California, Department of Fish and Wildlife (CDFW2)**

**December 10, 2018**

CDFW2-1      Thank you for noting this error in the document. This was a typographical error and should have stated there would be a 30-day review period. Upon requests from the public to extend the review period and with awareness of this error, the LACFCD extended the public review period to 48 days, formally accepting comments through December 31, 2018.



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 82123  
(858) 467-4201  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**EDMUND G. BROWN, Jr., Governor**  
**CHARLTON H. BONHAM, Director**



December 27, 2018

Mr. John Bodenchak  
Los Angeles County Dept. of Public Works  
Water Resources Division, 2<sup>nd</sup> Floor  
900 S. Fremont Ave.  
Alhambra, CA 91803  
[spreadinggrounds@dpwlacounty.gov](mailto:spreadinggrounds@dpwlacounty.gov)

**CDFW3**

**Subject: Comments on the Los Angeles County Department of Public Works'  
Recirculated Mitigated Negative Declaration for the Pacoima Spreading Grounds  
Improvement Project, City of Los Angeles, Los Angeles County. (SCH #2016011026)**

Dear Mr. Bodenchak:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Recirculated Mitigated Negative Declaration (RMND) for the Pacoima Spreading Grounds Improvement Project (Project). The Lead Agency for the Project is the Los Angeles County Department of Public Works (County). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

#### **CDFW's Role**

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

1

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & Game Code, § 2050 *et seq.*), or state-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish and Game Code, §1900 *et seq.*) authorization as provided by the applicable Fish and Game Code will be required.

## Project Description and Summary

CDFW3

**Objective:** The site currently diverts water from Pacoima Wash into ten spreading basins and two desilting basins at a surface water storage capacity of 530 acre-feet and a percolation rate of 65 cubic feet per second. The proposed Project would deepen and reconfigure the basins to increase the surface water storage capacity to 1,197 acre-feet and to increase percolation rate to 142 cubic feet per second. The Project would also eliminate the earthen bottom intake canal that moves water from Pacoima Wash to the basins and replace it with four 54-inch diameter reinforced concrete pipes.

**Location:** The 169-acre Project site is located within the City of Los Angeles in the north-central portion of the San Fernando Valley at the intersection of Paxton Street and Arleta Avenue.

1 cont.

## Comments and Recommendations

CDFW offers the comments and recommendations below to assist County in adequately identifying, avoiding and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Additional comments or other suggestions may also be included to improve the document.

## Project Description and Related Impact Shortcoming

### Comment #1: Hydrology

**Issue:** The RMND indicates the Project does not foresee changes to the downstream biological resources by the increase in the quantity of water diverted. The RMND also states, "Additionally, implementation of the Project would not result in a change to surface flows downstream of the site (i.e., hydrological interruption) that could negatively effect biological resources in the Pacoima Diversion Channel or the Los Angeles River." However, it is unclear how the RMND conclusion is reached without providing detailed analysis of how the project will reduce surface flows below the spreading grounds. Furthermore, the RMND states "Typically, the further the distance between a reduced flow regime and the vegetation that may be supported by that flow, the less the effect of the change in flows due to contributions from watersheds downstream coming in." Without referenced materials, CDFW is unable to verify the validity of the claim.

**Specific impact:** Project implementation will divert storm water flows from Pacoima Wash, thereby reducing water to downstream resources.

2

**Why impact would occur:** Project implementation would result in a substantial adverse effect through habitat modifications caused by alteration of streamflow regimes.

**Evidence impact would be significant:** Reduced instream flows, prolonged low flows, and loss of seasonal flow peaks can have a number impacts on wildlife, and changes in flow rates are likely to become even more pronounced as the climate changes (Deitch et al. 2018). High flows remove and transport fine sediment downstream (Poff et al. 1997); without these flows, streams may become buried, decreasing available habitat for aquatic species. Reduction in flow can also cause channels to become disconnected from floodplains resulting in decreased productivity; floodplains are important nursery grounds for some species, and they transfer



organic matter and organisms to the main channel (Poff et al. 1997). When fish lose access to backwater wetlands, they can experience reduced reproduction and recruitment (Junk et al. 1989, Sparks 1995). These decreases in habitat availability can increase both intra and interspecific competition as well as likelihood of predation (CDFG 2004). Changes in flow rates can also increase the prevalence of invasive species including plants (Horton 1977, Friedman et al. 1998) and fish (Gehrke et al 1995).

Reduced seasonal flows can decrease food supply for aquatic species (CDFW 2004). McKay and King (2006) reported decreased diversity of macroinvertebrates in response to low flows. Such changes can result in a substantial alteration of the aquatic food webs (Power 1992, Wootten et al. 1996).

2 cont.

Water diversions can also alter water properties including temperature, pH, dissolved oxygen levels, and nutrient contents (O'Hare et al. 2013). As flow rates are reduced by diversion, water temperature increases, which, for some species of fish, can reduce growth rates, increase predation risk, and increase susceptibility to disease (Moore and Townsend 1998, Marine and Cech, Jr. 2004). When water temperatures increase they hold less dissolved oxygen and increase in pH; reduction in dissolved oxygen can decrease survival of some fish (Selong et al. 2001, Martins et al. 2011).

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#### **Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** CDFW recommends the Final RMND include a detailed description of the operations of the Spreading Grounds including: a definition of storm water, duration of diversion, timing of water diversion, and flow regimes. The description should identify high flows caused by on-going storm events, non-storm releases from Pacoima Reservoir for conservation purposes, range of flow rates of the Pacoima Wash when diversions will occur, and effects of the flow rates within the channel and downstream during and immediately after diversion. CDFW recommends the County provide information describing how the Project will change historical average monthly flows below the spreading grounds, including calculating the percentage the flow reduction anticipated from this Project.

3

**Mitigation Measure #2:** CDFW recommends the Final RMND provide detailed information supporting the statement "Typically, the further the distance between a reduced flow regime and the vegetation that may be supported by that flow, the less the effect of the change in flows due to contributions from watersheds downstream coming in."

4

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#### **Comment #2: Biological Resources**

**Issue:** The RMND states, "No native vegetation types occur on the Project site. As a result, there are no riparian habitats or sensitive natural communities identified by regional plan, policies, regulations, or agencies on the Project site. However, the RMND states "This section of the Los Angeles River does contain biological resources, but this includes many non-native invasive plant and wildlife species." CDFW is concerned that the RMND only assesses non-native plant and wildlife species without identifying and addressing impacts all other biological resources potentially impacted by the Project.

5

**Specific impacts:** Project implementation will divert storm water flows from Pacoima Wash, thereby reducing water that support biological resources downstream.

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**Why impact would occur:** Project implementation would result in a substantial adverse effect through habitat modifications caused by alteration of streamflow regimes. The Project may result in direct and indirect injury or mortality to downstream biological resources and within the Glendale Narrows section of the Los Angeles River, as well as on-going and future restoration projects under the United States Army Corps of Engineers' approved Los Angeles River Ecosystem Restoration Plan.

**Evidence impact would be significant:** Water diversions can impact flow regimes, decreasing the frequency of high flows. Prolonged low flows can cause streams to become graded and cause channels to become disconnected from floodplains (Poff et al. 1997). This process decreases available habitat for aquatic species including fish that utilize floodplains for nursery grounds. Prolonged low flows can also increase mortality for species that rely on specific flow regimes, such as endangered salmonids (Moyle 2002). Reduced flows can also lead to stagnant water conditions, a situation that allows the growth of harmful cyanobacteria resulting in mortality of aquatic animals (Power et al. 2015).

Amphibians can also be sensitive to decreased flows; plethodontid salamanders are intolerant to desiccation and thus vulnerable to headwater stream diversions (Ray 1958). Kupferberg et al. (2012) reported that low flows were strongly correlated with early life stage mortality and decreased adult densities of foothill yellow-legged frogs (*Rana boylei*) and California red-legged frogs (*Rana draytonii*), both species of special concern in California. Plant cover and diversity can also be decreased by reduced flows (Busch and Smith 1995, Stromberg et al. 1996), likely as a result of physiological stress leading to reduced growth rates and recruitment, morphological changes, and mortality (Reily and Johnson 1982, Perkins et al. 1984, Fenner et al. 1985, Kondolf and Curry 1986, Rood and Mahoney 1990).

5 cont.

Plant cover and diversity can also be decreased by reduced flows (Busch and Smith 1995, Stromberg et al. 1996). Likely as a result of physiological stress leading to reduced growth rates and recruitment, morphological changes, and mortality (Reily and Johnson 1982, Perkins et al. 1984, Fenner et al. 1985, Kondolf and Curry 1986, Rood and Mahoney 1990). Wash out and stranding of fish and other species can also be a consequence of reduced flows (Cushman 1985).

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#### **Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** The Final RMND should evaluate the environmental flows necessary to protect existing stream dependent fish and wildlife resources and evaluate how any proposed flow alterations or diversions affect existing biological resources. Any proposed alteration of flow should identify downstream impacts to the Glendale Narrows section of the Los Angeles River, as well as on-going and future restoration projects under the United States Army Corps of Engineers' approved Los Angeles River Ecosystem Restoration Plan. The Final RMND should include mitigation measures to alleviate impacts resulting from reduced flows, alterations, or diversions.

6

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#### **Comment #3: Ground-nesting Birds**

**Issue:** CDFW is concerned the buffer distance suggested in MM Bio-1 (25 to 100 feet for nesting birds) may be inadequate to protect nesting birds from take. In addition, the suggested

7



survey area of 50 feet surrounding the project area for nesting birds may also be inadequate to identify nesting birds that may be impacted from the Project and subject to take.

**Specific impacts:** Grading, noise, vibration, lighting, and other Project-related disturbances may result in take of nesting birds.

**Why impact would occur:** The project site contains suitable habitat for nesting birds. The project is likely to occur during bird breeding season. It is unknown which species will utilize the site for nesting in any given year. Since it is unknown which species will attempt to nest on the site, the survey area and buffer zones for nesting birds from Project-related disturbances may be inadequate to protect all species with potential to nest on site.

7 cont.

**Evidence impact would be significant:** Take of individual birds and their nests is defined by Fish and Game Code section 86 and prohibited by sections 3503, 3503.5, and 3513. Take is defined in Fish and Game Code section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill." Without appropriate take avoidance surveys prior to project operations including, but not limited to, ground and vegetation disturbing activities, adverse impacts to nesting birds may occur because species presence/absence has not been verified and/or the buffer zone distance is inadequate. Furthermore, nests of all native bird species are protected under both federal and state laws and regulations, including the Migratory Bird Treaty Act (MBTA; U.S.C. §§ 703 - 712) and California Fish and Game Code sections 3503 and 3503.5, respectively.

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#### **Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** In order to avoid impacts to nesting birds, the Final RMND should require that clearing of vegetation, and when biologically warranted construction, occur outside of the peak avian breeding season which generally runs from February 1 through September 1 (as early as January for some raptors). If Project construction is necessary during the bird breeding season, a qualified biologist with experience in conducting bird breeding surveys should conduct weekly bird surveys for nesting birds, within three days prior to the work in the areas, and ensure no nesting birds in the Project areas would be impacted by the Project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer should be a minimum width of 300 feet (500 feet for raptors), be delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No Project construction should occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the Project.

8

**Mitigation Measure #2:** Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors. CDFW recommends the Final RMND include justifications for reductions in buffer distances. The Final RMND should also assess potential impacts due to reduced buffer zones.

9

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#### **General Comments**

1. Lake and Streambed Alteration Agreements (LSAA). The project site contains features and activities, including the replacement of the water diversion point and the undergrounding of

10



the diversion channel that fall under CDFW LSA Authority. As a Responsible Agency under CEQA guidelines section 15381, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the Negative Declaration or Environmental Impact Report of the local jurisdiction (Lead Agency) for the project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.

10 cont.

2. Weed Control. The Project site contains mainly weedy, non-native species. CDFW recommends planting the upland (excluding roads) and non-inundated areas of the Project with native, drought tolerant species to help reduce the number of weeds on the Project site. Areas left without vegetation are hotspots for weeds to become established and contribute weed propagules to the downstream watershed.

11

### Filing Fees


The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

### Conclusion

We appreciate the opportunity to comment on the Project to assist the County of Los Angeles Department of Public Works in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the County has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines; § 15073(e)]. If you have any questions or comments regarding this letter, please contact Steve Gibson, Senior Environmental Scientist (Specialist) at [steve.gibson@wildlife.ca.gov](mailto:steve.gibson@wildlife.ca.gov) or (562) 342-2106.

12

Sincerely,



Erinn Wilson  
Environmental Program Manager I

ec: CDFW

**State of California, Department of Fish and Wildlife (CDFW3)**

**December 27, 2018**

CDFW3-1 Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. The discussion of CDFW's expected role on the Project, the Project objective, and the submittal of comments to assist the LACFCD in preparation of the Recirculated MND is appreciated. It is noted the LACFCD is the Lead Agency under CEQA for this Project; the Los Angeles County Public Works administers, and acts on behalf of, the LACFCD.

CDFW3-2 As stated in Response CDFW1-1, above, implementation of the Project is not expected to result in a change to surface flows downstream of the site that would negatively affect biological resources downstream, including the Glendale Narrows section of the LA River or potential future restoration projects in the LA River approved by the LA River Ecosystem Restoration Plan.

The channels below the Pacoima Spreading Grounds are concrete-lined, with the exception of a small reach of the Los Angeles River near its confluence with the Pacific Ocean. As such, there are minimal native habitat resources and ecological function present in these channels.

It is recognized that the Glendale Narrows section of the Los Angeles River has vegetation that has persisted without active management by the U.S. Army Corps of Engineers. However, the increased diversion into the Pacoima Spreading Grounds resulting from the Project, of up to 10,500 acre-feet per year (in a wet year), would not adversely affect the biological resources of the Glendale Narrows section for the following reasons.

First and most importantly, the Pacoima Spreading Grounds will be operated such that flows will be diverted into the Spreading Grounds only during high flow conditions (i.e. intense storm events) wherein the majority of runoff flows through the Glendale Narrows section (and the remainder of the Los Angeles River) and ultimately into the ocean. Some vegetation types and/or wildlife species are dependent on the effects of flood flows occurring on the upper banks, or floodplain, of a waterway (e.g., such as scouring, sediment transport, seed transport, seed scarification). Although the "banks" of the Glendale Narrows stretch are less steep than the vertical channel walls present upstream, the levy slopes remain composed of concrete. As such, there is no potential for terracing (i.e., level benches arrayed in steps) as would be present in a natural system. Terraces on the banks of a natural stream system are where flood-dependent biological processes occur. Therefore, the Glendale Narrows stretch is not a flood-dependent habitat area because of topography of the banks (i.e., no terracing). Accordingly, any reduction of flows passing through the Glendale Narrows, as long as low flows continue, would not adversely affect the riparian woodland habitat in this reach. Since the Project would only divert flows during high flow conditions, the Project would not change the volume or frequency of low flows.

In addition, the further the distance between a reduced flow regime created by a diversion and the downstream vegetation that may be supported by that flow, the less effect the change in flows will typically have on that vegetation. This is because the amount of downstream flow reduction resulting from the diversion

represents a smaller and smaller percentage of the total downstream flow reaching the vegetation as additional flows enter the drainage system downstream of the diversion. In regard to the Project in particular, there are innumerable additional inflows to the channel and the River over the approximately 15 linear miles between the diversion point and the Glendale Narrows section of the Los Angeles River. At this substantive distance, there would be no detectable reduction or other change in surface flows due to Project operation, regardless of how much water is diverted.

Further, the watershed upstream of the diversion point represents only approximately 11 percent of the total watershed draining to the Glendale Narrows area with most being pervious as opposed to the mostly impervious balance of the contributing watershed (see Exhibit CDFW1-1). The impervious surfaces of the downstream portions of the watershed would be expected to contribute in greater proportion to the flows in the channel and LA River.

For the foregoing reasons, the Project's impact on biological resources downstream, including the Glendale Narrows section of the Los Angeles River or potential future restoration projects in the Los Angeles River approved by the Los Angeles River Ecosystem Restoration Plan, is expected to be negligible and additional hydraulic data is considered unnecessary for the determination of impact significance.

In addition to Response CDFW1-1, above, although flows would be reduced by Project implementation and reduced flows can have substantial adverse effects on downstream resources, the proposed diversions of the Project, specifically, would not have substantial adverse effects on downstream resources as explained above.

- CDFW3-3 Based on the assessment described in Response CDFW1-1 and restated in Response CDFW3-2, above, additional hydraulic data is unnecessary for the determination of impact significance.
- CDFW3-4 Please see Response CDFW3-2, above. The concept that the percent contribution of any one tributary is reduced as more tributaries contribute to a drainage is considered general in nature and has been clarified. Supporting data is not considered to be necessary.
- CDFW3-5 All biological resources potentially impacted, both native and non-native, by the Project have been assessed in the Recirculated MND. The text quoted in the comment refers to the vegetation on the Project site. The discussion of downstream flows within the Recirculated MND discusses biological resources potentially impacted in off-site downstream areas. In addition, please see Response CDFW3-2, above.
- CDFW3-6 Please see Response CDFW3-2, above.
- CDFW3-7 As suggested in the comment, the buffer distance and the survey area described in MM BIO-1 are modified as noted in Section 4.0, Clarifications, of this document and as provided below.

**MM BIO-1** The Project shall be conducted in compliance with the conditions set forth in the Migratory Bird Treaty Act (MBTA) and *California Fish*

and Game Code with methods approved by the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) to protect active bird/raptor nests. As the Project requires that work be initiated during the breeding season for nesting birds (March 1–September 15) and nesting raptors (January 1–July 31), a pre-construction survey for nesting birds and/or raptors shall be conducted by a qualified Biologist within 3 days prior to any construction activities on the Project site and in the immediately surrounding area (i.e., within ~~300~~50 feet for nesting birds and within 500 feet for nesting raptors). If the Biologist does not find any active nests in or immediately adjacent to the Project site, the construction work shall be allowed to proceed and no further mitigation is required.

If the Biologist finds an active nest in or immediately adjacent to the Project site and determines that the nest may be impacted or breeding activities substantially disrupted due to planned construction activities, the Biologist shall delineate an appropriate buffer zone around the nest depending on the sensitivity of the species and the nature of the construction activity. Any nest found during survey efforts shall be mapped on the construction plans. The active nest shall be protected until nesting activity has ended. To protect any nest site, the following restrictions to construction activities shall be required until nests are no longer active, as determined by a qualified Biologist: (1) construction limits shall be established within a buffer around any occupied nest (the buffer shall be ~~300~~25–400 feet for nesting birds and 300–500 feet for nesting raptors), unless otherwise determined by a qualified Biologist and (2) access and surveying shall be restricted within the buffer of any occupied nest, unless otherwise determined by a qualified Biologist. A qualified Biologist may determine a reduced buffer is appropriate due to existing screening or limited extent and or duration of an impact such that nesting birds are not expected to be negatively impacted. Encroachment into the buffer area around a known nest shall only be allowed if the Biologist determines that the proposed activity would not disturb the nest occupants. Construction in a buffer area can proceed when the qualified Biologist has determined that fledglings have left the nest or the nest has failed.

- CDFW3-8      Please see Response CDFW3-7, above.
- CDFW3-9      As suggested in the comment, justifications for the qualified biologist determination of a reduced buffer has been added to MM Bio-1 as noted in Section 4.0, Clarifications, of this document.
- CDFW3-10     As described in Response CDFW1-4, above, and restated here, the Project includes no substantial work within Pacoima Wash that would change the bed, channel, or bank. Therefore, no Lake and Streambed Alteration Agreement (LSAA) is needed. Furthermore, upon construction completion, the facility would only be operated during high flow conditions and would not divert dry weather flows from the downstream channels. Therefore, it would have a negligible impact on base flow for downstream riparian resources as described further in Response CDFW3-

2, above. Lastly, the Project will not alter the existing intake capacity (maximum 600 cfs). During typical high flow conditions, when the diversion is intended to occur, the peak flow in the channel would exceed the 600 cfs and all excess flows would continue downstream, as in the existing condition.

CDFW3-11 As described in Response CDFW1-5, above, and restated here: As the Project would result in no significant impacts to sensitive vegetation types or plant species and no unmitigated significant impacts to wildlife species, there is no requirement to implement the recommended mitigation pursuant to Section 15126(a)(3) of the State CEQA Guidelines. However, the recommendation is acknowledged and will be considered.

CDFW3-12 The LACFCD will remit the appropriate CDFW filing fees upon filing the Notice of Determination (NOD) with the Los Angeles County Clerk.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7 – Office of Regional Planning  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-6536  
FAX (213) 897-9140  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life.*

December 13, 2018

Ernesto Rivera  
Los Angeles County  
Flood Control District  
900 South Fremont Ave, 11<sup>th</sup> Floor  
Alhambra, CA 91803

RE: Pacoima Spreading Grounds Improvement  
Project  
GTS # 07-LA-2018-02048

Mr. Rivera:

DOT2

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this Spreading Grounds Improvement Project. The Project would involve several improvements to the existing facilities, including replacing the intake canal with underground pipelines, deepening and combining the basins to remove the underlying clay layer and to increase basin capacity, replacing inter basin structures and the outlet structure based on the new basin configuration, and installing new fencing and a bike trail. These improvements would increase the water-holding capacity of the spreading grounds from 530 af to 1,197 af, increase the percolation rate of the spreading basins from 65 cfs to 142 cfs, eliminate localized flooding on Arleta Avenue, and improve the efficiency of operations and maintenance. The Project would result in an estimated additional 10,500 acre-feet per year (af/y) of water conservation in a wet year (LACFCD 2011); however, the actual amount of water conservation would vary greatly from year to year depending on the availability of storm water.

1

Caltrans has reviewed the Draft Mitigated Negative Declaration and does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

However, any project work proposed in the vicinity of the Caltrans Right of Way, would require an encroachment permit and all environmental concerns must be adequately addressed.

2

In the Spirit of mutual cooperation, Caltrans staff is available to work with your planners and traffic engineers for this project, if needed. If you have any questions regarding these comments, please contact project coordinator Reece Allen, at reece.allen@dot.ca.gov and refer to GTS# 07-LA-2018-02048

3

Sincerely,

  
MIYA EDMONSON  
IGR/CEQA Branch Chief



**State of California, Department of Transportation (DOT2)**

**December 13, 2018**

- DOT2-1      Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged.
- DOT2-2      This comment is acknowledged. The LACFCD would acquire all necessary permits, as required by Caltrans, to implement the Project, including a Caltrans transportation permit if applicable. Additionally, all potential issues of concern have been adequately addressed in the 2016 MND and the Recirculated MND.
- DOT2-3      This comment is acknowledged.



**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

December 13, 2018

Ernesto Rivera  
Los Angeles County Flood Control District  
Los Angeles County  
900 South Fremont Avenue  
Alhambra, CA 91803

RE: Pacoima Spreading Grounds Improvement Project – Notice of Intent to Adopt a Recirculated Mitigated Negative Declaration (MND)

Mr. Rivera:

**METRO**

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Pacoima Spreading Grounds Improvement Project (Project) located in the City of Los Angeles (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

The purpose of this letter is to briefly describe the proposed Project, based on the Notice of Intent to Adopt a Recirculated Mitigated Negative Declaration and to outline recommendations from Metro concerning issues that are germane to our agency's statutory responsibility in relation to the Metro bus facilities and services, which may be affected by the proposed Project.

1

### **Project Description**

The proposed Project would involve several improvements to the existing facilities to increase the water storage capacity from 530 acre-feet (af) to 1,197 af; increase the percolation rate from 65 cubic feet per second (cfs) to 142 cfs; eliminate localized flooding on Arieta Avenue; and improve the efficiency of operations and maintenance. The improvements would include replacing the intake canal with underground pipelines; deepening and combining the basins to remove the underlying clay layer; and replacing interbrain structures and the outlet structure. Approximately 1.6 million cubic yards (cy) of sediment processing pits and sunshine Canyon Landfill. The sediment export would generate up to 239 round trips from 14-cy haul trucks or 186 round trips from 18-cy haul trucks per day, for a period of approximately 20-months beginning in fall 2019. The project area is near Metro bus stops.

Metro Comments Related to Bus Stop Adjacency	METRO
1. <b>Service:</b> Metro Bus Line 158 operates on Devonshire Street, adjacent to the proposed Project. One Metro Bus stop is directly adjacent to the proposed Project at Devonshire Street and Arleta Avenue. Other transit operators may provide service in this area and should be consulted.	2
2. <b>Final Bus Stop Condition:</b> The existing Metro bus stop must be maintained as part of the final Project. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus operations. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.	3
3. <b>Impact Analysis:</b> With an anticipated increase in traffic during and after construction, Metro encourages any impact analysis to include potential effects on the Metro Bus line. Potential impacts could include construction traffic, operation of and shipment/deliveries to the completed Project, and temporary or permanent bus service rerouting.	4
4. <b>Driveways:</b> Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.	5
5. <b>Bus Stop Access &amp; Enhancements:</b> Metro strongly encourages the installation of bus shelters with benches, wayfinding signage, enhanced crosswalks and ramps compliant with the Americans with Disabilities Act (ADA), as well as pedestrian lighting and shade trees in paths of travel to access bus stops and other amenities that improve safety and comfort for transit riders. The City should consider requesting the installation of such amenities as part of the development of the site.	6
6. <b>Bus Operations Contacts:</b> Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 with any questions and at least 30 days in advance of initiating construction activities. Other municipal buses may also be impacted and should be included in construction outreach efforts.	7
In addition to the specific items outlined above, Metro would like to provide the Project Sponsor with two resources: 1) the Metro Adjacent Development Handbook, which provides an overview of common concerns for development adjacent to Metro-owned right-of-way (ROW) and bus stops, and 2) the Adjacent Construction Manual with technical information. These documents and additional resources are available at <a href="http://www.metro.net/projects/devreview/">www.metro.net/projects/devreview/</a> .	8

Pacoima Spreading Grounds Improvement Project  
Notice of Intent to Adopt a Recirculated MND– Metro Comments  
December 13, 2018

If you have any questions regarding this response, please contact Eddi Zepeda by phone at 213-418-3484, by email at [DevReview@metro.net](mailto:DevReview@metro.net), or by mail at the following address:

Metro Development Review  
One Gateway Plaza MS 99-23-4  
Los Angeles, CA 90012-2952

Sincerely,

**METRO**



Georgia Sheridan, AICP  
Senior Manager, Transit Oriented Communities

Attachments and links:

- 
- Adjacent Construction Design Manual
  - Adjacent Development Handbook: <https://www.metro.net/projects/devreview/>
- 

8 cont.

## ADJACENT CONSTRUCTION DESIGN MANUAL

## 1.0 INTRODUCTION

1.1 Parties planning construction over, under or adjacent to a Metropolitan Transportation Authority (MTA) facilities or structures are advised to submit for review ~~seven (7)~~ **two (2) hard** copies **and one (1) electronic copy** of their **design** drawings and ~~four (4)~~ copies of their calculations showing the relationship between their project and the MTA facilities, for MTA review. The purpose of the MTA review is to reduce the chance of conflict, damage, and unnecessary remedial measures for both MTA and the parties. Parties are defined as developers, agencies, municipalities, property owners or similar organizations proposing to perform or sponsor construction work near MTA facilities.

1.2 Sufficient drawings and details shall be submitted at each level of completion such as Preliminary, In-Progress, Pre-final and Final, etc. to facilitate the review of the effects that the proposed project may or may not have on the MTA facilities. An MTA review requires internal circulation of the construction drawings to concerned departments (~~usually includes Construction, Operations, Maintenance, and Real Estate~~) **for MTA departments review**. Parties shall be responsible for all costs related to ~~MTA drawing reviews by MTA~~. MTA costs shall be based upon the actual hours taken for review at the hourly rate of pay plus overhead charges. Drawings normally required for review are:

- A. Site Plan
- B. Drainage Area Maps and Drainage Calculations
- C. Architectural drawings
- D. Structural drawings and calculations
- E. Civil Drawings
- F. Utility Drawings
- G. Sections showing Foundations and MTA Structures
- H. Column Load Tables
- I. Pertinent Drawings and calculations detailing an impact on MTA facilities
- J. A copy of the Geotechnical Report.
- K. Construction zone traffic safety and detour plans: Provide and regulate positive traffic guidance and definition for vehicular and pedestrian traffic adjacent to the construction site to ensure traffic safety and reduce adverse traffic circulation impact.
- L. Drawings and calculations should be sent to:

**MTA Third Party Administration (Permits Administration)**  
**Los Angeles County Metropolitan Transportation Authority**  
One Gateway Plaza  
Los Angeles, California 90012

- 1.3 If uncertainty exists on the possible impacts a project may have on the MTA facilities, and before submitting a formal letter requesting a review of a construction project adjacent to the Metro System, the party or his agent may contact the MTA Third Party Administrator (Permits). The Party shall review the complexity of the project, and **contact MTA to** receive an informal evaluation of the amount of detail required for the MTA review. In those cases, whereby it appears the project will present no risk to MTA, the Third Party Administrator (Permits) shall immediately route the design documents to **Engineering**, Construction, Operations, Maintenance, and Real Estate departments for a preliminary evaluation. If it is then confirmed that MTA risk is not present, the Administrator shall process an approval letter to the party.
- 1.4 A period of 30 working days should be allowed for review of the drawings and calculations. Thirty (30) work days should be allowed for each successive review as required. It is noted that preliminary evaluations are usually produced within 5 working days.
- 1.5 The party shall reimburse the MTA for any technical review or support services costs incurred that are associated with his/her request for access to the Metro **Transit**Rail System
- 1.6 The following items must be completed before starting any construction:
- A. Each part of the project's design may be reviewed and approved by the MTA. The prime concern of the MTA is to determine the effect of the project on the MTA structure and its transit operations. A few of the other parts of a project to be considered are overhead protection, dust protection, dewatering, and temporary use of public space for construction activities.
  - B. Once the Party has received written acceptance of the design of a given project then the Party must notify MTA prior to the start of construction, in accordance with the terms of acceptance.
- 1.7 Qualified Seismic, Structural and Geotechnical Oversight
- The design documents shall note the name of the responsible Structural Engineer and Geotechnical Engineer, licensed in the State of California.

## 2.0 REVIEW PROCEDURE

- 2.1 All portions of any proposed design that will have a direct impact on an MTA facility or structure will be reviewed to assure that the MTA facility or structure is not placed in risk at any time, and that the design meets all applicable codes and criteria. Any portion of the proposed design that is to form part of an MTA controlled area shall be designed to meet the MTA Design Criteria and Standards.
- 2.2 Permits, where required by the local jurisdiction, shall be the responsibility of the party. City of L.A. Dept. of Bldg. and Safety and the Bureau of Engineering permit review shall remain in effect. Party shall refer to MTA Third Party Administration policies and procedures, THD5 for additional information.
- 2.3 Monitoring of the temporary support of excavation structures for adjacent construction shall be required in all cases for excavations within the geotechnical zone of influence of MTA structures. The extent of the monitoring will vary from case to case.



- 2.4 Monitoring of the inside of MTA tunnels and structures shall be required when the adjacent excavation will unload or load the MTA structure or tunnel. Monitoring of vertical and horizontal distortions will include use of extensometers, inclinometers, settlement reference points, tiltmeters, groundwater observation wells, tape extensometer anchor points and load cells, as appropriately required. Acceptable limits of movement will depend on groundwater conditions, soil types and also the length of service the stations and tunnels have gone through. Escorts will be required for the survey parties entering the Metro operating system in accordance with MTA Operating Rules and Procedures. An MTA account number will be established and the costs for the escort monitoring and surveying service will be billed directly to the party or his agent as in section 1.2.
- 2.5 The calculations submitted for review shall include the following:
- A. A concise statement of the problem and the purpose of the calculation.
  - B. Input data, applicable criteria, clearly stated assumptions and justifying rationale.
  - C. References to articles, manuals and source material shall be furnished with the calculations.
  - D. Reference to pertinent codes and standards.
  - E. Sufficient sketches or drawing references for the work to be easily understood by an independent reviewer. Diagrams indicating data (such as loads and dimensions) shall be included along with adequate sketches of all details not considered standard by MTA.
  - F. The source or derivation of all equations shall be shown where they are introduced into the calculations.
  - G. Numerical calculations shall clearly indicate type of measurement unit used.
  - H. Identify results and conclusions.
  - I. Calculations shall be neat, orderly, and legible.
- 2.6 When computer programs are used to perform calculations, the following information shall accompany the calculation, including the following:
- A. Program Name.
  - B. Program Abstract.
  - C. Program Purpose and Applications.
  - D. Complete descriptions of assumptions, capabilities and limitations.
  - E. Instructions for preparing problem data.
  - F. Instructions for problem execution.
  - G. List (and explanation) of program acronyms and error messages.
  - H. Description of deficiencies or uncorrected errors.
  - I. Description of output options and interpretations.
  - J. Sample problem(s), illustrating all input and output options and hardware execution statements. Typically, these problems shall be verified problems.
  - K. Computer printout of all supporting calculations.

- L. The "User's Manual" shall also include a certification section. The certification section shall describe the methods and how they cover the permitted options and uses of the program.
- 2.7 Drawings shall be drawn, to scale, showing the location and relationship of proposed adjacent construction to existing MTA structures at various stages of construction along the entire adjacent alignment. The stresses and deflections induced in the existing MTA structures should be provided.
- 2.8 The short-term and long-term effects of the new loading due to the adjacent construction on the MTA structures shall be provided. The soil parameters and other pertinent geotechnical criteria contained in existing contract documents for the affected structure, plus any additional conditions shall be used to analyze the existing MTA structures.
- 2.9 MTA structures shall be analyzed for differential pressure loadings transferred from the adjacent construction site.

### 3.0 MECHANICAL CRITERIA

- 3.1 Existing services to MTA facilities, including chilled water and condenser water piping, potable and fire water, storm and sanitary sewer, piping, are not to be used, interrupted nor disturbed without written approval of MTA.
- 3.2 Surface openings of ventilation shafts, emergency exits serving MTA underground facilities, and ventilation system openings of surface and elevated facilities are not to be blocked or restricted in any manner. Construction dust shall be prevented from entering MTA facilities.
- 3.3 Hot or foul air, fumes, smoke, steam, etc., from adjacent new or temporary facilities are not to be discharged within 40 feet of existing MTA ventilation system intake shafts, station entrances or portals. Tunnel ventilation shafts are both intake and discharge structures.
- 3.4 Clear access for the fire department to the MTA fire department connections shall be maintained at all times. Construction signs shall be provided to identify the location of MTA fire department connections. No interruption to fire protection water service will be permitted at any time.
- 3.5 Modifications to existing MTA mechanical systems and equipment, including ventilation shafts, required by new connections into the MTA System, shall only be permitted with prior review and approval by MTA. If changes are made to MTA property as built drawings shall be provided reflecting these changes.

At the option of MTA, the adjacent construction party shall be required to perform the field tests necessary to verify the adequacy of the modified system and the equipment performance. This verification shall be performed within an agreed time period jointly determined by MTA and the Party on a case by case basis. Where a modification is approved, the party shall be held responsible to maintain original operating capacity of the equipment and the system impacted by the modification.

## 4.0 OPERATIONAL REQUIREMENTS

### 4.1 GENERAL

- A. Normal construction practices must be augmented to insure adequate safety for the general public entering Metro Stations and riding on Metro Trains and Buses. Design of a building, structure, or facility shall take into account the special safety considerations required for the construction of the facility next to or around an operating transit system.
- B. Projects which require working over or adjacent to MTA station entrances shall develop their construction procedures and sequences of work to meet the following minimum requirements:
  - 1. Construction operations shall be planned, scheduled and carried out in a way that will afford the Metro patrons and the general public a clean, safe and orderly access and egress to the station entrance during revenue hours.
  - 2. Construction activities which involve swinging a crane and suspended loads over pedestrian areas, MTA station entrances and escalators, tracks or Metro bus passenger areas shall not be performed during revenue hours. Specific periods or hours shall be granted on a case-by-case basis, **with the approval of Construction Work Plan by MTA Construction Safety Department.**
  - 3. All cranes must be stored and secured facing away from energized tracks, when appropriate.
  - 4. All activity must be coordinated through the MTA Track Allocation process in advance of work activity. **All members of the work crew will be required to attend MTA Safety Training.**
  - 5. **In order to provide a safe zone to maintain adjacent developments. All developments adjacent to Metro At-Grade Stations, Aerial Stations or Track Guideways shall provide a minimum 5 foot setback from the Metro and developer's shared property line to the outside face of the proposed structure at Metro or the developer's property for maintenance to be performed or installed from within the zone created by this setbacks.**

### 4.2 OVERHEAD PROTECTION - Station Entrances

- A. Overhead protection from falling objects shall be provided over MTA facilities whenever there is possibility, due to the nature of a construction operation, that an object could fall in or around MTA station entrances, bus stops, elevators, or areas designed for public access to MTA facilities. Erection of the overhead protection for these areas shall be done during MTA non-revenue hours.
  - 1. The design live load for all overhead protection shall be 150 pounds per square foot minimum. The design wind load on the temporary structures shall be 20 pounds per square foot, on the windward and leeward sides of the structure.
  - 2. The overhead protection shall be constructed of fire rated materials. Materials and equipment shall not be stored on the completed shield. The roof of the

shield shall be constructed and maintained watertight.

- B. Lighting in public areas and around affected MTA facilities shall be provided under the overhead protection to maintain a minimum level of twenty-five (25) footcandles at the escalator treads or at the walking surface. The temporary lighting shall be maintained by the Party.
- C. Wooden construction fencing shall be installed at the boundary of the areas with public access. The fencing shall be at least eight-feet high, and shall meet all applicable code requirements.
- D. An unrestricted public access path shall be provided at the upper landing of the entrance escalator-way in accordance with the following:
  - 1. A vertical clearance between the walking surface and the lowest projection of the shield shall be 8'-0".
  - 2. A clear pedestrian runoff area extending beyond the escalator newel shall be provided, the least dimension of which shall be twenty (20) feet.
  - 3. A fifteen (15) foot wide strip (other than the sidewalk) shall be maintained on the side of the escalator for circulation when the escalator is pointed away from a street corner.
  - 4. A clear path from any MTA emergency exit to the public street shall be maintained at all times.
- E. Temporary sidewalks or pedestrian ways, which will be in use more than 10 days, shall be constructed of four (4") inch thick Portland cement concrete or four (4") inches of asphaltic concrete placed **over a minimum four (4") inches of untreated base material**, and finished by a machine.

#### 4.3 OVERHEAD PROTECTION - Operating Right-of-Way Trackage

- A. MTA Rail Operations Control Center shall be informed of any intent to work above, on, or under the MTA right-of-way. Crews shall be trained and special flagging operations shall be directed by MTA Rail Operations Control Center. The party shall provide competent persons to serve as Flaggers. These Flaggers shall be trained and certified by MTA Rail Operations prior to any work commencing. All costs incurred by MTA shall be paid by the party.
- B. A construction project that will require work over, under or adjacent to the at grade and aerial MTA right-of-way should be aware that the operation of machinery, construction of scaffolding or any operation hazardous to the operation of the MTA facility shall require that the work be done during non-revenue hours and authorized through the MTA Track Allocation process.
- C. MTA flagmen or inspectors from MTA Operations shall observe all augering, pile driving or other work that is judged to be hazardous. Costs associated with the flagman or inspector shall be borne by the Party.

- D. The party shall request access rights or track rights to perform work during non-revenue hours. The request shall be made through the MTA Track Allocation process.-

#### 4.4 OTHER METRO FACILITIES

- A. Access and egress from the public streets to fan shafts, vent shafts and emergency exits must be maintained at all times. The shafts shall be protected from dust and debris. See Exhibit A for details.
- B. Any excavation in the vicinity of MTA power lines feeding the Metro System shall be through hand excavation and only after authorization has been obtained through the MTA Track Allocation process. MTA Rail Operations Control Center shall be informed before any operations commences near the MTA power system.
- C. Flammable liquids shall not to be stored over or within 25 feet horizontally of MTA underground facilities. If installed within 25 to 100 feet horizontally of the structure, protective encasement of the tanks shall be required in accordance with NFPA STD 130. Existing underground tanks located within 100 feet horizontally of MTA facilities and scheduled to be abandoned are to be disposed of in accordance with Appendix C of NFPA STD 130. NFPA STD 130 shall also be applied to the construction of new fuel tanks.

- D. Isolation of MTA Facilities from Blast

Subsurface areas of new adjacent private buildings where the public has access or that cannot be guaranteed as a secure area, such as parking garages and commercial storage and warehousing, will be treated as areas of potential explosion. NFPA 130, Standard for Fixed Guideway Transit Systems, life safety separation criteria will be applied that assumes such spaces contain Class I flammable, or Class II or Class III Combustible liquids. For structural and other considerations, isolation for blast will be treated the same as seismic separation, and the more restrictive shall be applied.

- E. Any proposed facility that is located within 20 feet radius of an existing Metro facility will require a blast and explosion study and recommendations to be conducted by a specialist who is specialized in the area of blast force attenuation. This study must assess the effect that an explosion in the proposed non-Metro facility will have on the adjacent Metro facility and provide recommendations to prevent any catastrophic damage to the existing Metro facility. Metro must approve the qualifications of the proposed specialist prior to commencement of any work on this specialized study.

#### 4.5 SAFETY REGULATIONS

- A. Comply with Cal/OSHA Compressed Air Safety Orders Title 8, Division 1, Chapter 4, Subchapter 3. Comply with California Code of Regulations Title 8, Title 29 Code of Federal Regulations; and/or the Construction Safety and Health Manual ( Part F ) of the contract whichever is most stringent in regulating the safety conditions to be maintained in the work environment as determined by the Authority. The Party recognizes that government promulgated safety regulations are minimum standards and that additional safeguards may be required

- B. Comply with the requirements of Chemical Hazards Safety and Health Plan, (per 29 CFR 1910.120 entitled, ( Hazardous Waste Operations and Emergency Response) with respect to the handling of hazardous or contaminated wastes and mandated specialty raining and health screening.
- C. Party and contractor personnel while within the operating MTA right-of-way shall coordinate all safety rules and procedures with MTA Rail Operations Control Center.
- D. When support functions and electrical power outages are required, the approval MUST be obtained through the MTA Track Allocation procedure. Approval of the support functions and power outages must be obtained in writing prior to shutdown.

## **5.0 CORROSION**

### **5.1 STRAY CURRENT PROTECTION**

- A. Because stray currents may be present in the area of the project, the Party shall investigate the site for stray currents and provide the means for mitigation when warranted.
- B. Installers of facilities that will require a Cathodic Protection (CP) system must coordinate their CP proposals with MTA. Inquiries shall be routed to the Manager, Third Party Administration.
- C. The Party is responsible for damage caused by its contractors to MTA corrosion test facilities in public right-of-way.

**End of Section**



**Los Angeles County Metropolitan Transportation Authority (METRO)**

**December 13, 2018**

- METRO-1. Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged.
- METRO-2 As discussed on page 3-124 of the Recirculated MND, "Implementation of the Project would not create a demand for alternative transportation systems and would not affect public transit services such that a conflict with alternative transportation policies would occur. No demand for public transit, bicycle, or pedestrian facilities would be created by the Project since there would be no change to land uses in the Project area. The bus stop at Devonshire Street and Arleta Avenue would remain in its current location and continue normal operations during Project implementation. The bike path to be constructed as part of the Project would enhance and complement existing alternative transportation systems but would not generate new alternative transportation trips."
- METRO-3 Please refer to Response METRO-2, above. The existing bus stop at Devonshire and Arleta is acknowledged in the Recirculated MND, and implementation of the proposed Project would not require any permanent alteration to the public right-of-way (ROW), including existing public transportation facilities and the surrounding sidewalk. Per RR TRA-1 on page 3-83 of the Recirculated MND, activities on or adjacent to a public street, including haul truck movement, would be conducted with traffic control measures per the Greenbook and WATCH Manual, which would be subject to City of Los Angeles Department of Transportation (LADOT) approval. These traffic control measures include the presence of non-vehicular traffic, and through following the signage and directions of flagmen, the Project would not create a safety issue.
- METRO-4 The Recirculated MND included an impact analysis of potential effects on use of the Metro bus stop and pedestrian traffic in general. As stated on pages 3-124 and 3-125 of the Recirculated MND, "With regard to safety issues for persons using alternative transportation, including pedestrians and bicyclists on streets near the Project site, the LACFCD has evaluated alternative haul routes, including analysis of potential traffic impacts at intersections, in order to arrive at the planned haul routes. While some portions of the planned haul routes have fewer residences than others, individuals who travel using alternative transportation can potentially be on all roadways. The presence of haul trucks and/or movement of construction equipment on the road network is a common and unavoidable consequence of the frequent construction activity that occurs in a dense urban environment, even on the scale necessary to remove the excavated sediment from the Project site. Per RR TRA-1, activities on or adjacent to a public street, including haul truck movement, would be conducted with traffic control measures per the Greenbook and WATCH Manual, which would be subject to LADOT approval. These traffic control measures include the presence of non-vehicular traffic, and through following the signage and directions of flagmen, the Project would not create a safety issue."
- As discussed in Response Metro-2, above, page 3-124 of the Recirculated MND states "The bus stop at Devonshire Street and Arleta Avenue would remain in its current location and continue normal operations during Project implementation."

As disclosed in Section 3.16, Transportation/Traffic, of the Recirculated MND, the Project's trip generation would affect intersection operations, measured as Volume-to-Capacity (V/C) ratios, but that the quantitative change in the V/C ratios did not exceed LADOT significance thresholds. This finding includes study intersection no. 1, Arleta Avenue and Devonshire Street. Similarly, while bus traffic at this bus stop may be slowed due to Project implementation, the degree of slowing would be less than significant. As such, there would be no significant direct or indirect impact on the operation of the Metro bus stop, including the need for bus service rerouting or alterations to the bus stop facility.

- METRO-5      The planned haul routes, including points of ingress and egress from the Project site, are detailed on pages 2-5 and 2-6, and illustrated on Exhibits 2-7 through 2-11 of the Recirculated MND. Additionally, page 2-8 of the Recirculated MND states "There are three gated access points on Arleta Avenue to the County-owned property—two into the headworks area and one into the spreading basins. There are also gated access points on the north and south sides of Devonshire Street. Construction workers would enter and exit the main parking area at the headworks via one or both of the gated access points on Arleta Avenue." There are no new driveways to be designed and configured with respect to transit stops. The existing driveways serving the site would be used during construction, and an analysis of the potential impact of construction traffic on alternative transportation in the area, provided in the Recirculated MND, is discussed in Response Metro-4, above.
- METRO-6      As discussed in Response Metro-2, above, page 3-124 of the Recirculated MND states "The bus stop at Devonshire Street and Arleta Avenue would remain in its current location and continue normal operations during Project implementation. The bike path to be constructed as part of the Project would enhance and complement existing alternative transportation systems but would not generate new alternative transportation trips." The proposed Project is not a site development, as indicated in Comment Metro-6, above, such that the identified transit features would be included in the Project site. The site would continue to operate as a water conservation facility and is enclosed in fencing and locked gates along its perimeter.
- METRO-7.      This comment is acknowledged.
- METRO-8      This comment is acknowledged.



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Ernesto Rivera

Los Angeles County Flood Control District

900 South Fremont Avenue, 11th Floor

Alhambra, CA 91803

December 12, 2018

## **Recirculated Mitigated Negative Declaration (MND) for the Proposed Pacoima Spreading Grounds Improvement Project**

SCAQMD

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

### **SCAQMD Staff's Summary of Project Description**

The Lead Agency is proposing improvements to the existing spreading grounds, including excavation of 1.6 million cubic yards (cy) of sediment to increase water storage capacity from 530 acre-feet (af) to 1,197 af and to increase the percolation rate from 65 cubic feet per second (cfs) to 142 cfs on 169 acres (Proposed Project). Construction of the Proposed Project will require 1.37-million cubic yards of sediment export to four off-site deposition locations. The Proposed Project is located on the southwest corner of Arleta Avenue and Devonshire Street in the City of Los Angeles. Construction of the Proposed Project is expected to occur over 20 months<sup>1</sup>.

### **SCAQMD Staff's Summary of Air Quality Analysis**

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. The Lead Agency found that construction of the Proposed Project would not result in significant adverse air quality impacts from regional NO<sub>x</sub> emissions or localized PM<sub>10</sub> emissions after the implementation of Mitigation Measures (MM) AQ-1 and MM AQ-2. MM AQ-1 requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 Final emissions standards<sup>2</sup>. MM AQ-2 requires the top of the central levee spanning the spreading grounds in a northeast southwest direction be paved or a Roadway Mat System that is no less effective than a paved road at controlling fugitive dust emissions be installed<sup>3</sup>. Additionally, the Lead Agency found that construction-related cancer risks from the Proposed Project's diesel particulate matter (PM) emissions would range from 0.1 in one million to 8.4 in one million, which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk, after the implementation of MM AQ-1<sup>4</sup>.

1

SCAQMD staff has comments on the meteorological data and the onsite idling emissions calculations. Additionally, SCAQMD staff recommends that the Lead Agency incorporate additional mitigation measures to further reduce the Proposed Project's construction emissions, particularly from NO<sub>x</sub>. Please see the attachment for more information.

<sup>1</sup> Recirculated MND. Page 3-45.

<sup>2</sup> *Ibid.* Page 3-28.

<sup>3</sup> *Ibid.*

<sup>4</sup> *Ibid.* Table 3-8. Page 3-26.

Closing

SCAQMD

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

2

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist - CEQA IGR Section, at [rdalbeck@aqmd.gov](mailto:rdalbeck@aqmd.gov), if you have any questions regarding these comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:RD

LAC181113-04

Control Number



## ATTACHMENT

Air Quality Analysis

## SCAQMD

*AERMOD Dispersion Model: Meteorological Data*

1. The U.S. EPA recommends that for on-site meteorological data, the most recent five-year data, or at least one year of site-specific data or at least three years of prognostic meteorological data be used for the purposes of air dispersion modeling<sup>5</sup>. If one year or more, up to five years, of site-specific data are available, these data are preferred for use in air quality analyses. Depending on completeness of the data record, consecutive years of national weather service, site-specific, or prognostic data are preferred<sup>6</sup>. The Lead Agency indicated that 2010-2014 meteorological data from the Burbank monitoring site was used for dispersion modeling for both criteria pollutants and toxic air contaminants (TACs) because “no monitoring data is available for the Burbank Station after 2014”<sup>7</sup>. However, the Burbank Airport Station has more recent AERMOD-ready meteorological data from 2012-2016 which should be used by the Lead Agency for the air dispersion modeling in the Final MND.

3

*CalEEMod Input Parameter: Average Vehicle Weight*

2. Based on a review of the CalEEMod output, SCAQMD staff found that the Lead Agency analyzed the Proposed Project’s construction emissions resulting from 1.3-million-cubic-yards of sediment export using 14-cubic-yards (cy) capacity trucks (T6 vehicle class) and 18-cy capacity trucks (T7 vehicle class). Each scenario assumed that 100 percent of haul truck trips would be completed by their respective vehicle class. Upon review of the CalEEMod input parameters, SCAQMD staff found that the assumption of average vehicle weight was 20 tons for both classes of haul trucks. Considering an average T7 heavy heavy-duty truck can weigh up to 66,000 pounds<sup>8</sup> when empty, and one cy of sediment can weigh upwards of 2,000 pounds depending on compositional density of sediment, level of saturation, etc., SCAQMD staff is concerned that the Lead Agency has likely underestimated the average vehicle weight in each scenario, which may have led to an underestimation of construction emissions from haul truck trips. Therefore, SCAQMD staff recommends that the Lead Agency recalculate the average vehicle weight for each individual vehicle class, including the added weight of sediment at full-load, and revise the Proposed Project’s construction emissions, or provide additional information to justify the use of 20 tons for the average vehicle weight of each vehicle class in the Final MND.

4

*On-Site Idling Emissions*

3. In the Air Quality Section, the Lead Agency quantified the Proposed Project’s construction emissions from idling for 7.5 minutes<sup>9</sup>. In order to analyze a worst-case impact scenario from idling, SCAQMD staff recommends that the Lead Agency revise the Air Quality Analysis to model idling emissions for 15 minutes at each point source. The 15-minute idling is conservative because it includes the emissions generated when entering the Proposed Project site while heading towards the dock area;

5

<sup>5</sup> United States Environmental Protection Agency. February 2000. *Meteorological Monitoring Guidance for Regulatory Modeling Applications*. Page 6-30. Available at: <https://www3.epa.gov/scram001/guidance/met/mmgrma.pdf>. See also 40 CFR Ch. I (7-1-11 Edition). *Appendix W to Part 51 – Guideline on Air Quality Models*. Available at: <https://www.gpo.gov/fdsys/pkg/CFR-2011-title40-vol2/pdf/CFR-2011-title40-vol2-part51-appW.pdf>.

<sup>6</sup> *Ibid*.

<sup>7</sup> Recirculated MND. Section 3, *Environmental Checklist Form*. Page 3-24

<sup>8</sup> [https://www.arb.ca.gov/msei/onroad/downloads/tsd/Vehicle\\_Population.doc](https://www.arb.ca.gov/msei/onroad/downloads/tsd/Vehicle_Population.doc).

<sup>9</sup> Recirculated MND. Page 3-23.

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idling at the dock; and the emissions generated when leaving the docks while departing from the Proposed Project.

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5 cont.

**Recommended New Mitigation Measures**

4. In the event that the Lead Agency finds, after incorporating the recommended revisions based on Comment Nos. 1 to 3, that the Proposed Project's construction emissions would exceed SCAQMD's recommended air quality CEQA significance thresholds, feasible mitigation measures are required and should be incorporated in the Final MND. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate the Proposed Project's adverse impacts. To further reduce NOx emissions during construction from both on-site construction equipment and mobile sources, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final MND.

- Require zero-emissions or near-zero emission trucks, if and when feasible. Consider measures such as incentives, phase-in schedules for clean trucks, etc. At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year and newer trucks (e.g., material delivery trucks and soil import/export).
  - Suspend all on-site construction activities when wind speeds (as instantaneous gusts) exceed 25 miles per hour.
  - All trucks hauling dirt, sand, soil or other loose materials are to be covered, or should maintain at least two feet of freeboard in accordance with California Vehicle Code Section 23114 (freeboard means vertical space between the top of the load and top of the trailer).
  - Enter into a contract that notifies all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the gates of the Proposed Project site. To further ensure that drivers understand the vehicle idling requirement, post signs at the Proposed Project's entry gates stating that idling longer than five minutes is not permitted. To further ensure that construction equipment operators understand the construction equipment idling requirement, post signs throughout the Proposed Project site.
- 

6



## **South Coast Air Quality Management District (SCAQMD)**

**December 12, 2018**

- SCAQMD-1 Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged.
- SCAQMD-2 This comment is acknowledged. The LACFCD has met or exceeded all requirements of CEQA and the State CEQA Guidelines throughout the CEQA process. The LACFCD and County of Los Angeles Board of Supervisors will consider all comments provided on both the 2016 MND and the Recirculated MND through this Responses to Comments document.
- SCAQMD-3 With regard to the use of meteorological data from the Burbank Airport Station instead of the Burbank West Palm Avenue Monitoring Station data in the *Revised Air Quality, Greenhouse Gas Emissions, and Health Risk Assessment Impact Analysis* (Revised Air Quality Report), the recommended 2012-2016 meteorological data from Burbank Airport was created by the SCAQMD on May 22, 2017. The original AERMOD runs were completed in 2014 for an MND dated January 2016, using data from this station, and the AERMOD runs that are provided in the Recirculated MND were completed in July 2017 for an MND dated November 2018. As such, the Burbank Airport meteorological data for 2012-2016 was not publicly available at the time the Revised Air Quality Report was prepared.

Further, the West Palm Avenue Station is located in close proximity to Burbank Airport, situated approximately 2.5 miles to the northwest. As such the data for the overlapping years 2012, 2013, and 2014 should be nearly identical in both data sets. Since only two of the five years are different between the two data sets, it is unlikely that any of the AERMOD modeling results would change by more than a couple percentage points either way with the use of the Burbank Airport data. As detailed in the Revised Air Quality Report (Appendix A to the Recirculated MND), the AERMOD results that are closest to exceeding a standard are the local PM<sub>10</sub> concentration, where the mitigated condition shows a 24-hour concentration as high as 9.58 µg/m<sup>3</sup> with a threshold of 10.4 µg/m<sup>3</sup>. It would require the 24-hour PM<sub>10</sub> emissions to increase by more than 8.5 percent before a change in the significance conclusion would occur.

In summary, the Burbank Airport Station data was unavailable at the time the Revised Air Quality Report was prepared. The use of Burbank Airport Station data and/or use of data from 2012-2016 would not change the significance conclusion of any thresholds analyzed with the AERMOD model. As such, the use of the Burbank West Palm Avenue Monitoring Station data from 2010-2014 remains appropriate.

- SCAQMD-4 Regarding the assertion that use of 20 tons for the average weight of all haul trucks underestimates the weight of the 18-cubic yard (cy) capacity trucks (T7 vehicle class), the cited California Air Resources Board (CARB) document was reviewed and the empty truck weight cited of 66,000 pounds was found to come from Table 7.2-1 within the document. The description of the table states "The thirteen vehicle classes were differentiated primarily on the basis of gross vehicle weight, as shown in Table 7.2-1." The "gross vehicle weight" referenced in the CARB document is a legal classification, utilized by the Federal Highway Administration (FHWA) and

California Department of Motor Vehicles (DMV), defined as the vehicle weight with the maximum allowable cargo load weight. In the case of the Project, this would refer to an 18-cy truck with the maximum load of dirt. As such, the SCAQMD comment is incorrect claiming that an unloaded T7 truck could weigh up to 66,000 pounds.

To demonstrate that the 20 ton weight was a reasonable estimate to use in the analysis, the worst-case (i.e., full load) weight of the T6 class of 33,000 pounds and the T7 class of 66,000 pounds were utilized based on half of the truck trips with the loaded condition (as half would be returning from disposal in an unloaded condition) and on soil weighing 2,000 pounds per cy, as identified in the comment. This would result in the unloaded T6 truck weighing 2.5 tons and an unloaded T7 truck to weigh 12 tons, or average weights of 9.5 tons for the T6 trucks and 21 tons for the T7 trucks. The T6 maximum gross weight is 16.5 tons and can carry 14 cy at 1 ton per cy or 14 tons of load. This equates to an unloaded T6 truck weighing 2.5 tons ( $16.5 - 14 = 2.5$ ). Since half of trips would be without a load, average T6 weight would be  $(16.5 + 2.5) / 2 = 9.5$  tons. The T7 maximum gross weight is 30 tons and can carry 18 cy at 1 ton per cy or 18 tons of load. This equates to an unloaded T7 truck weighing 12 tons ( $30 - 18 = 12$ ). Since half of trips would be without a load, average T7 weight would be  $(30 + 12) / 2 = 21$  tons. Since these weights were based on the worst-case limits for the T6 and T7 classes, the use of 20 tons for all truck trips provides a reasonable assumption for the T7 class trips and overestimates the T6 class trips. As such, the average truck weight of 20 tons provides a reasonable estimate of the truck weights anticipated to occur in the proposed Project.

SCAQMD-5 Regarding the idling time of 7.5 minutes on page 3-23 of the Recirculated MND, the comment states that 15 minutes should have been utilized, which represents “emissions generated when entering the Proposed Project site while heading towards the dock area; idling at the dock; and the emissions generated when leaving the docks while departing from the Proposed Project.” The 7.5 minutes analyzed in the MND is for truck idling per one-way truck trip, where entering the Project site is one trip and leaving the Project site is counted as a second trip. Based on this method, the SCAQMD description for 15 minutes of idling represents two trips, which is equivalent to 7.5 minutes of idling per truck trip. As such, idling emissions in the MND in fact account for 15 minutes total of idling emissions.

SCAQMD-6 As demonstrated in Responses SCAQMD-3, SCAQMD-4, and SCAQMD-5, above, the conclusions of the Revised Air Quality Report, including all assumptions applied therein, remain appropriate. Based on the results of the Revised Air Quality Report, the Recirculated MND includes feasible mitigation measures to reduce the impacts related to emissions of NO<sub>x</sub> (MM AQ-1) and fugitive dust (MM AQ-2) to a less than significant level. Although not necessary to reduce a potential significant impact, the LACFCD has voluntarily defined the following special provisions for the proposed Project, which would be enforceable as part of the contractor’s specifications:

- Section 3-12.1.2 shall require all trucks used for transporting all excavated material shall meet the United States Environmental Protection Agency’s emission standards for model year 2013 or newer.
- Section 3-12.1.4 shall restrict idling to less than five minutes per Title 13, CCR, Section 2485. In addition, all trucks shall be prohibited from idling

within 100 feet from any residential area and no idling at schools. Signs shall be posted at all Project site entrances/exits and loading areas.

- Per Section 3-12.2.2, the Contractor shall comply with SCAQMD Rule 402 and Rule 403 Large Operations, shall comply with SCAQMD Rule 403 requirements for wind gusts over 25 miles per hour (mph), all haul trucks shall be covered (no exceptions). Section 3-12.2.2 of the contract special provisions are stricter than Rule 403 and California Vehicle Code 23114. Details will be included in the Fugitive Dust Control Plan.

### **3.2 INDIVIDUALS**

- Yolie Anguiano, November 27, 2018.
- Yolie Anguiano, December 4, 2018.
- Clarence Brown, December 31, 2018.
- Elizabeth Chou, November 21, 2018.
- Ricardo Diaz, November 30, 2018.
- Christine Green, December 4, 2018.
- Elizabeth Marx, December 13, 2018.
- Susan Milne, December 13, 2018.
- Jesus Ramos, November 30, 2018.
- Robert Rouge, November 27, 2018.

**From:** Yolie Anguiano < >

**Sent:** Tuesday, November 27, 2018 10:50 AM

**To:** DPW-SpreadingGrounds <[SpreadingGrounds@dpw.lacounty.gov](mailto:SpreadingGrounds@dpw.lacounty.gov)>; Ernesto Rivera <[ERIVERA@dpw.lacounty.gov](mailto:ERIVERA@dpw.lacounty.gov)>

**Subject:** News clip showing Nature Parkway advocacy

Hello Mr. Rivera:

**YA1**

I'm looking forward to meeting you on Thursday for the community meeting to discuss the Pacoima Spreading Grounds improvement project?

The community driven efforts to extend and expand the Nature Parkway, the only vitalized sidewalk at the Pacoima Spreading Grounds will be advocating for it to be enhanced and extended. I have attached a clip showing our advocacy captured by Spectrum News, click [here](#) to view it.

1

Thank you for your time-

Yolie Anguiano MPA

ED for Valle Vida

**Yolie Anguiano (YA1)**

**November 27, 2018**

YA1-1      Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment regarding the community efforts and advocacy is acknowledged. A multi-benefit project may be considered in the future to include public recreation and additional aesthetic enhancements. The LACFCD is looking forward to working with the community on future projects near the Pacoima Spreading Grounds facility.



**From:** Yolie Anguiano  
**Sent:** Tuesday, December 4, 2018 11:47 AM  
**To:** Keith Lilley; steven.kuo@ladwp.com; DPW-SpreadingGrounds; Helen To; Paul Shadmani; Carolina Hernandez  
**Cc:** Chong-Castillo, Maria; Orellana, Jessica  
**Subject:** Following up on PSG Community meeting  
**Attachments:** Vitalize Info Sheet.pdf

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YA2

Thank you for setting up the meeting last week and committing to serve the public. I did want to say that I hope you are better prepared next round (bring power point print outs, put the power point presentation online, use the whole screen to project, bring handouts in spanish and english.) It seemed as if little effort was put into presenting the report to the public, and our community's NIMBYs became aggravated.

I want to help in any which way I can, let me know how I can help. Attend neighborhood council meetings and I can inform them during public comment, for example. If I neglected to introduce myself to you last Thursday, I'm Yolie Anguiano, Executive Director to Valle Vida a non-profit dedicated to vitalizing sidewalks into urban trails in the San Fernando Valley. Our current initiative is to expand and enhance the Nature Parkway (currently just along Devonshire St. between Woodman and Arleta) around the Pacoima basins. We are happy to be recognized by the environmental report and for LA County Supervisor Kuehl's office for planning to orchestrate conversations that can advance our mission. Principal Engineer Keith Lilley reminded me there is a greater initiative for the upper LA River greenway master plan to realize as well. This is an exciting time for us!!

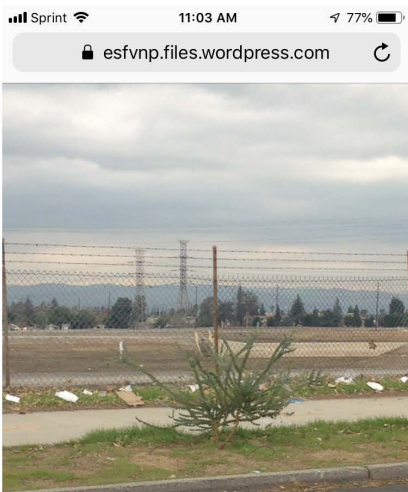
1

**You're invited! Please join me at the Nature Parkway on Friday, December 14th sometime between 6am and 2pm to see the urban trail.** There you will see our community impact sustained by donations and volunteers. Milken Community Schools will be planting drought tolerant plants (from 10am-12pm) on the Nature Parkway as part of their toxic tour of the North East San Fernando Valley. Solutions (planting) to problems (toxicity).

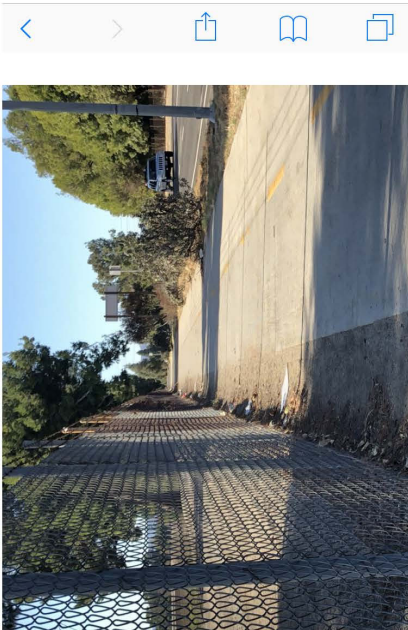
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I wanted to make you all aware of the comment I turned in. The tubular fence will not protect the basin from fly away trash. The North East San Fernando Valley experiences high winds year round and the chain link fence protected the basin from fly away trash. Keeping the chain link fence is not an answer but choosing an aesthetically pleasing and protective fence instead is the answer. This is what I'm referring too, see pictures below. Our beautification efforts pick up the trash on a regular basis when it rests beside the chain link fence.

2

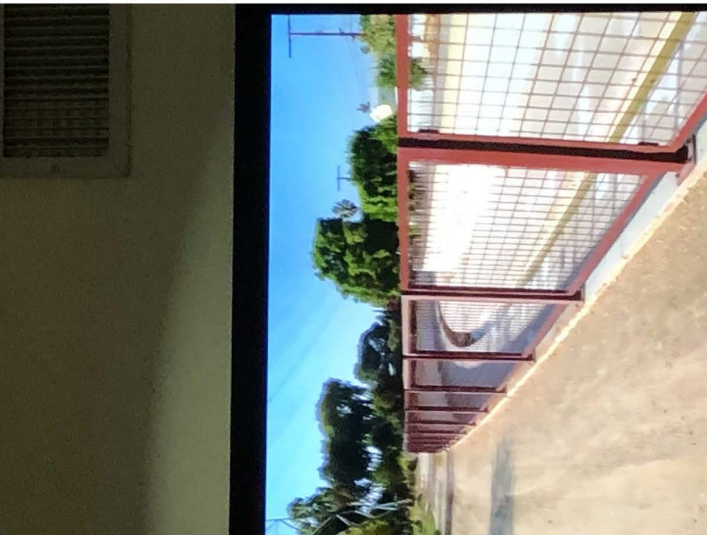


2 cont.

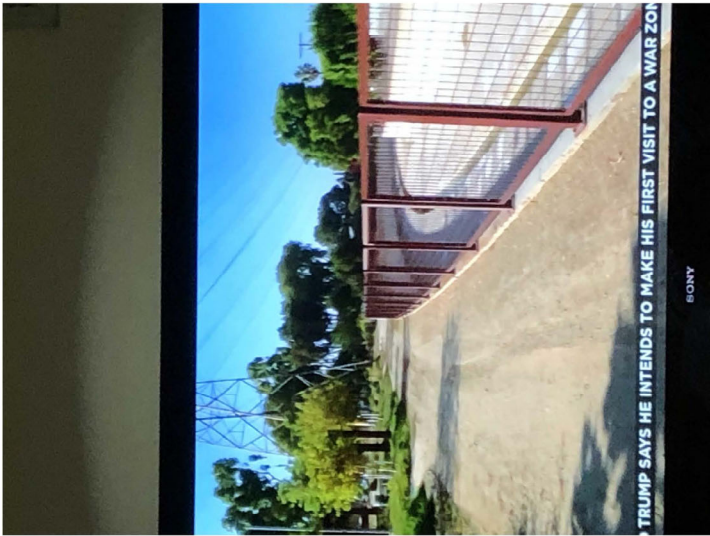




This is a better option than tubular fencing. Installing it next to where the basin sinks will allow more walkable space for recreation. We want to have public access to the fire road or driving path. 2 cont.







2 cont.

To learn more about our efforts and why Valle Vida was formed [click on this news clip by Spectrum News The Beat On One](#)

3

Hope to see you soon, thanks for your time and attention-  
Yolie Anguiano



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## Who We Are

Residents from the North East San Fernando Valley volunteering to improve and protect our community's landscape. In 2011, the advocacy of the late Community Watchdog Al Piantanida and community advocate Yolie Anguiano led the beautification project that transformed a blighted and underutilized sidewalk along the Pacoima Spreading Grounds into the Nature Parkway. The aromatherapeutic scent coming from drought tolerant plants also act as a buffer against passing vehicles creating a safe and local spot for recreation and fun. This effort has provided natural goods and services as plants filter air pollutants, retain stormwater, offer educational and recreational opportunities, improve human health, increase property values, attract visitors, and play a significant role in building community.

## What We Do

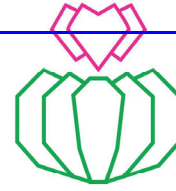
Connect communities to nature and improve the health of all living things.

## What's Next

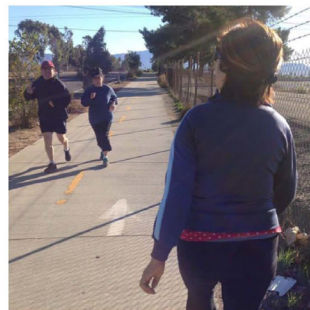
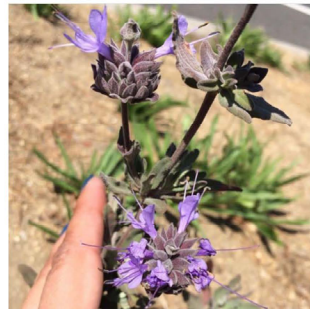
- Bring infrastructure that will help residents feel safe to walk on their streets' sidewalks
- Expand the Nature Parkway at the Pacoima Spreading Grounds and throughout the East San Fernando Valley
- Transform targeted sidewalks to urban trails that connect people to local parks and the Los Angeles National Forest

To learn more contact Yolie Anguiano at (818) 523-7330 [yolie@vitalizesfv.org](mailto:yolie@vitalizesfv.org)  
@NatureParkway

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# VITALIZE



**Yolie Anguiano (YA2)**

**December 4, 2018**

YA2-1 Thank you for attending the public meeting, and for submitting comments. All comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. It was unfortunate, but unforeseen, that the PowerPoint presentation could not be expanded to fit the pull-down screen. As per standard procedures, the presentation was placed on the County's website for the Project (<https://dpw.lacounty.gov/wrd/Projects/PacoimaSG/index.cfm>) the following day (November 30, 2018). It is noted that copies of the Notice of Intent (NOI) that was circulated to announce the public review period and the public meeting, with English on one side and Spanish on the reverse, and bound copies of an Executive Summary prepared for the meeting, in both English and Spanish, were available on a table near the main door. Additionally, although not mentioned in the comment, the services of an English-Spanish simultaneous interpreter were available; several oversize exhibits were placed on tables along the perimeter of the room; subject matter experts were stationed at each table to best respond to any questions on that topic; and the meeting time was extended over an hour to ensure that all questions were answered at the stations. The suggestion to have print outs of the presentation available for future meetings is noted.

A multi-benefit project may be considered in the future to include public recreation and additional aesthetic enhancements. The LACFCD is looking forward to working and partnering with the community on issues of concern and considering possible future projects near the Pacoima Spreading Grounds that would bring value to the community. Thank you for inviting the LACFCD to tour the Nature Parkway near the site.

YA2-2 This comment is acknowledged. Based on the community feedback, the LACFCD will be installing steel fencing along the entire public-facing perimeter (i.e., not facing private right-of-way) of the Pacoima Spreading Grounds, in addition to the perimeter segments discussed in the Recirculated MND. The LACFCD's maintenance crews will be routinely maintaining the Pacoima Spreading Grounds upon completion of the Project to minimize trash deposits in the basins. The LACFCD has received and reviewed the photographs included in this comment. Also, all comments received will be considered by the LACFCD and the County of Los Angeles Board of Supervisors, via this Responses to Comments document.

YA2-3 This comment is acknowledged.



**From:** Clarence Brown < >  
**Sent:** Monday, December 31, 2018 9:00 PM  
**To:** DPW-SpreadingGrounds <[SpreadingGrounds@dpw.lacounty.gov](mailto:SpreadingGrounds@dpw.lacounty.gov)>  
**Subject:** Tow away area on Woodman and Filmore

**CB**

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Hi I parked at Woodman and Filmore, I was wondering when did the Northwest side of Woodman became towaway, no parking? There were no signs, and no warnings. May we please have an explanation?

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**Clarence Brown (CB)**

**December 31, 2018**

CB-1      Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. The public right-of-way outside the fenced perimeter of the Pacoima Spreading Grounds is not within the LACFCD's jurisdiction. The LACFCD's contact receiving this comment reached out to the City of Los Angeles, who in turn forwarded the comment to the Council District 6 field representative for the Mission Hills/North Hills area, as this is believed to be the most likely source for pertinent information. Because this comment does not address the environmental analysis in the Recirculated MND, no further response is required.

**From:** Elizabeth Chou  
**Sent:** Wednesday, November 21, 2018 10:15 AM  
**To:** DPW-SpreadingGrounds  
**Subject:** Mailing list

EC

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Can I please be added to the mailing list?

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Thanks.

Liz

Elizabeth Chou  
City Hall beat reporter  
LA Daily News

**Elizabeth Chou (EC)**

**December 4, 2018**

EC-1      Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged. You have been added to the mailing list for the Pacoima Spreading Grounds Improvement Project.

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**From:** Ricardo Díaz  
**Sent:** Friday, November 30, 2018 9:13 AM  
**To:** DPW-SpreadingGrounds  
**Subject:** PACOIMA SPREADING GROUNDS IMPROVEMENT PROJECT

**RD1**

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Hello, I attended the meeting thursday night and i do have a couple questions.

I did see that there will be new fencing along devonshire ave, why not upgrade new fencing along the whole perimeter? there is always homeless breaking the chain fence along Filmore st to enter the spreading grounds to drop waste.

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1

**Ricardo Diaz (RD1)**

**November 30, 2018**

RD1-1      Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged. Based on the community feedback, the LACFCD will be installing steel fencing along the entire public-facing perimeter (i.e., not facing public right-of-way) of the Pacoima Spreading Grounds, in addition to the perimeter segments discussed in the Recirculated MND.



**From:** Christine Greene  
**Sent:** Thursday, December 13, 2018 4:54 PM  
**To:** DPW-SpreadingGrounds <[SpreadingGrounds@dpw.lacounty.gov](mailto:SpreadingGrounds@dpw.lacounty.gov)>  
**Cc:** [councilmember.rodriquez@lacity.org](mailto:councilmember.rodriquez@lacity.org)  
**Subject:** Pacoima Spreading Grounds Improvement Project

To whom it may concern:

CG

I attended the Community Meeting, November 29, 2018. I arrived at 6:00 pm and found no available parking. The gates were closed for the back lot of the Laborers Union Hall. It was raining, the sun set at 4:44 pm, and there was no parking on the street because the local residents had parked in front of their homes. I live in the area and as a female, did not feel safe walking a distance alone, in the dark night and rain. Determined to attend the meeting, I moved a dumpster in the parking lot to create a small parking space. When I asked the organizers of the meeting why the back lot was not open to facilitate parking, they said they didn't know how to open the gate.

1

The meeting started with a slideshow presentation that couldn't be seen from the front row, much less the any other part of the room. The organizers apologized for the inconvenience and offered the option for people to bring their chairs closer to the projection screen.

2

The public was told that no discussion or questions would be entertained until after the presentation. Individual questions or comments were to be taken up afterward at the individual stations. It seemed that the agenda was to hear the Public Works information, and no alternate concerns, comments, or questions which my fellow neighbors may have, were to be heard by anyone, especially other residents.

3

When I learned in the meeting that I had 2 weeks to review and comment on the MND, I was surprised to have such short notice. After the presentation, I asked Mr. Rivera, the Project Manager, why the CEQA Public Review Process was scheduled at the busiest time of the year, at the end of the year, during the holidays when most people are distracted and wouldn't have time to sit down and review the information that would impact their lives for a period of approximately 2 years? I asked him to consider moving the Public Review Process into January, just one month more to truly facilitate and welcome a greater amount of public opinions. Since the Board of Supervisors Hearing hadn't been scheduled and wasn't anticipated until Spring 2019, one month wouldn't seem to impact the process. His response was that he wanted the construction to begin in the Fall 2019 and that he didn't want to lose another season. I feel that to circumvent true public opinion in order to stick to a schedule is disingenuous to the purpose of the meeting and the public review process.

4

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It all made sense; scheduling the CEQA Public Review Process in December, not facilitating access to the meeting, an illegible slideshow, no open forum for questions and concerns, and not open to extend the Public Review Process just one month. At best, this was poorly planned, and at worst, the less the public and the affected community members know, the easier it is to push the project through. Public safety and public opinion are not a priority for the organizers of this project. Keeping to their timeline is.

5

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I live in the surrounding neighborhood of the Pacoima Spreading Grounds. I have two asthmatic individuals in my home. I want to review the MND report because it will impact my daily life for at least two years, if not longer if the necessary precautions aren't take to assure the air quality remains safe for those with compromised health. My challenge is that I care for my elderly mother who suffers from advanced Alzheimer's disease who, in the last two weeks, I have taken to the Emergency Room twice in addition to two doctor appointments which take at least 4 hours each. I have not had time in the last two weeks to review the MND and I do want to. With Thanksgiving, holiday gatherings, and Christmas shopping in addition to the regular demands of life, it makes it virtually impossible for me to review the MND and provide you thoughtful feedback.

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My request is once again that you consider moving the Public Review Process into January, just one month more to truly facilitate and welcome a greater amount of public opinions.

7

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Best Regards,

Christine Greene

**Christine Green (CG)**

**December 4, 2018**

- CG-1 Thank you for attending the public meeting and providing comments. All comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged. To reiterate the LACFCD's response, the LACFCD apologizes for the inconveniences you experienced.
- CG-2 This comment is acknowledged. It was unfortunate, but unforeseen, that the PowerPoint presentation could not be expanded to fit the pull-down screen. As per standard procedures, the presentation was placed on the County's website for the Project the following day (November 30, 2018).
- CG-3 This comment is acknowledged. The format of the presentation, the handouts, and the subsequent stations were organized solely with the intention of ensuring the greatest proportion of attendees could receive the most information possible, including one-on-one conversations with subject matter experts if there were questions after the presentation had been heard. These types of conversations would not be possible in an audience question and answer (Q&A) setting, which has greater time limitations. Any and all written comments are part of the public record, and, although not required by the State CEQA Guidelines, the LACFCD is preparing written responses to all comments received. The comments and responses will also become part of the public record as part of the Board of Supervisors agenda posted on the County website prior to the hearing to consider the Recirculated MND and the proposed Project. There will be a link to the LACFCD's webpage for the Project within the agenda, and the Project website will provide the Board agenda as well as all CEQA documents, including this Response to Comments and Clarifications document and the Mitigation Monitoring and Reporting Program document.
- CG-4 This comment is acknowledged. It has been confirmed that your name and address was on the Recirculated MND mailing list, and as such you would have received a Notice of Intent (NOI) via USPS on or within one day of start of the 30-day public review period. The NOI provided a summary of the Project, details of where the Recirculated MND could be reviewed, including on the County's website, as well as details of the public meeting. Regardless, upon requests from the public to extend the review period, the LACFCD was able to extend the public review period to 48 days, formally accepting comments through December 31, 2018. It is acknowledged that you had a discussion about the perception of the CEQA process timing with the LACFCD representative Mr. Ernesto Rivera at the community meeting, and he expressed that there was urgency to complete the CEQA process in order to begin construction in Fall 2019. If construction is not initiated this Fall, there would likely be a delay. This, in turn, delays any related water conservation projects. The LACFCD and LADWP are working to increase total storm water runoff retention and water reliability, and as such, delays are adverse. Despite best efforts, the Project was anticipated to begin construction in Spring 2021 at the time the Recirculated MND was prepared. The LACFCD is currently anticipating a Fall 2021 start date.

The LACFCD has met or exceeded all requirements of CEQA and the State CEQA Guidelines throughout the CEQA process. The CEQA process for an MND does

not require any public meetings/outreach and written responses to comments; both of which were implemented for the Project. The LACFCD used two different methods of circulating the NOI, direct mailing and publication in a newspaper of general circulation in the Project area (i.e., the *Los Angeles Times*), where one is required pursuant to Section 15072(b) of the State CEQA Guidelines. Additionally, the radius of direct mailing from the owners and occupants of the property contiguous to the Project site based on the assessor rolls, as described in the State CEQA Guidelines, was expanded to those within 500 feet. As such, the LACFCD made substantial efforts to notify and inform the community that would be potentially affected by Project implementation and has continued to refine the Project construction scenario and include additional amenities based on public feedback. There was no nefarious intent in the scheduling of the public review nor the community meeting. As discussed in the presentation, another opportunity for public input in the CEQA process is the Board of Supervisors hearing, which is not yet scheduled.

- CG-5            Please refer to Responses CG-2, CG-3, and CG-4, above.
- CG-6            Please refer to Responses CG-2, CG-3, and CG-4, above.
- CH-7            Please refer to Response CG-4, above.

Attention: Ernesto Rivera  
County of Los Angeles  
Department of Public Works  
Water Resources Division  
900 South Fremont Avenue  
Alhambra, CA 91803

December 13, 2018

**EM**

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This is in response to Recirculated Initial Study/Mitigated Negative Declaration (MND) Pacoima Spreading Grounds Improvement Project (PSG).

After reading through the IS/MND and appendices, there are clarifications needed in the data assumptions and modelling parameters used in the IS/MND. In addition, further mitigation is needed for community safety.

1

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The fact ALONE Air Quality mitigation did not include specifying newer haul trucks, 2010 and newer to mitigate for the health and safety of those who live around and along the route, is a massive oversight.

It should be required that haul trucks taking 478 daily round trips for almost two years through communities and by schools are up to the latest diesel emission standards. Devil's Gate project is meeting these requirements, so can ours (same basic - haul trucks through communities, by schools, home surrounding, moving 1.7 mcy).

2

The EPA and WHO both state that diesel fumes cause asthma, COPD, lung cancer and reduce lung growth especially in children. Any increase in diesel fumes is an increase in the chance of getting ill.

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### **Construction Scenario**

*The LACFCD recognizes that the Project's proximity to adjacent residences and other sensitive receptors is an important consideration and would prohibit use of the perimeter road of the spreading grounds for truck loading.*

Does truck loading also include truck queuing? No where in the presented documents does LACFCD specifically prohibit truck idling on the perimeter road. In fact it is noted trucks cannot idle for more than five minutes.

3

Can construction equipment idle behind homes?

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### **Further clarification required**

Based on based on CARB (<https://www.arb.ca.gov/msprog/truck-idling/factsheet.pdf>) it is illegal to queue within 100 feet of a residence, so this removes the perimeter road from trucks queuing and idling.

4

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For the health and well-being for those who share a property line with the PSG, please add no haul traffic and no idling of any construction equipment within 250 feet of residential properties.

5

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### **Air Quality**

#### **Modelling Parameters and Assumptions**

The only **onsite equipment** are two bulldozers, two excavators, one shaker/sifter, three water trucks and one street sweeper were modelled. There will be no loader? There will be not construction trucks (not haul trucks) on

6

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site? This is worst case? Only one area at a time to move 1.73 mcy of dirt? As a general comparison, the Tujunga Spreading Grounds EIR had work over a similar amount of time. Even not doing a direct comparison, the onsite equipment estimate seems low and not a worst case assumption.

6 cont.

For those 372-478 round trip hauls how many haul trucks will be on site at any one time?

Will the contract bid limit the allowable equipment to only what was modeled in this MND?

What happens when there is more equipment on site than is in the model?

7

What recourse is available to the community?

Will the construction company be penalized if they fail to mitigate?

*The project applicant shall require that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 Final emissions standards. This is for every piece of equipment ? Who checks?*

#### **MISSING MITIGATION**

LACFCD shall require all construction contractors during the sediment removal phase of the Proposed Project to use only sediment removal dump trucks that meet the EPA's emission standards for Model Year 2010 or later.

8

Who is going to confirm all trucks meet Tier 4 standards? Are you going to rely on spot checks by air pollution agencies only?

**Again, 2010 and later haul trucks must be added to the required mitigation.**

The distance between a sensitive receptor and the PSG was measured how? Please detail. From the edge of house to the edge of the property line? Please be specific how the measurement was made.

9

#### **CalEEMod Data Assumptions (Construction Impacts)**

*However, it should be noted that due to the air monitoring station's distance from the project site, recorded air pollution levels at the Burbank Station **reflect with varying degrees of accuracy, local air quality conditions at the project site.** It should also be noted that no monitoring data is available for the Burbank Station after 2014, so the three years of data provided are from 2012, 2013, and 2014.*

10

The modelling results therefore reflect varying degrees of accuracy, as well.

Land Use was user defined as Industrial. Please explain in detail why this was chosen as the project is an Open Space, not zoned industrial, and Open Space option is available. Would there have been any change in the results?

11

As haul trucks emission standards get better the newer the truck, what year was used in the modelling? I did not see a year listed, which seems odd as that directly reflects emission results.

12

The 169 acres will not be worked on simultaneously, so why was 169 acres chosen as the land use, when SCAQMD suggests using maximum daily disturbed acreage in the model?

13

*Winds are an important parameter in characterizing the air quality environment of a project site because they both determine the regional pattern of air pollution transport and control the rate of dispersion near a source.*

14



Best practice would have been to find the average wind speed from a local source. The nearest, official weather source with yearly wind data readily available is an LA County property, Whiteman Airport. 1.5 miles away from the PSG which shows 7.9 mph wind average, not the 4.4 mph used to model.	14 cont.
In addition, the weather in Table E is from 1906 to 1974 which does not represent the weather changes that have occurred in the last 50 years! The weather pattern has changed dramatically: <a href="https://spatial.usc.edu/wp-content/uploads/2014/03/Reed_Dustin.pdf">https://spatial.usc.edu/wp-content/uploads/2014/03/Reed_Dustin.pdf</a> . Why was an outdated data source used twice (first MND as well)?	15
The Localized Construction Emissions is already using a 5-acre model at a 82 feet. The stated nearest sensitive receptors are at 40 feet which means the impact of the dust will be four times worse than what is available on the LST table. Why further divide it by 169 acres, rather than disperse it over the five acres? SCAQMD notes you can model the area worked, so dividing it by 169 acres is a choice, not a requirement. Why was the choice made?	16
<b>Rule 403 - Best Available Control Measures</b>	
There is no mention of the stockpiles of the sediment awaiting screening or transport off-site, and inactive disturbed areas, and open storage piles and where they will place the anemometers.	17
Fugitive dust on windy days after hours and on the weekends could be an issue. Where is the plan for that?	18
Again, there is not mention that LACFCD shall require all construction contractors during the sediment removal phase of the Proposed Project to use only sediment removal dump trucks that meet the EPA's emission standards for Model Year of any sort - a glaring error.	19
<b>Further mitigation requested</b>	
<b>LACFCD shall require all construction contractors during the sediment removal phase of the Proposed Project to use only sediment removal dump trucks that meet the EPA's emission standards for Model Year 2010 or newer.</b>	20
Stoppage of all operations if average wind gusts exceed 25 mph.	21
Specific requirement that sifting and the piles of sediment remains at least 250 feet from sensitive receptors.	22
A further description should include: the county monitor must be on site at all time during the construction with the capability to monitor for noise, dust and emissions and is available to immediately deal with complaints arising from the project. Average and peak readings, sample times, locations and instrumentation shall be recorded in the construction logbook. When a complaint is made, all exposure parameters must be check at the complaints workstation and documented in the construction logbook. If exposure exceed the limits work must stop until the problem is found and fixed.	23
Increased watering frequency would be required whenever wind speeds exceed 15 mph.	24
HEPA filters for those homes near the PSGs, especially for those whose homes will still be adversely affected by NoX regardless of the mitigation steps taken (Exhibit 3.3 - PM10 Concentration with Mitigation).	25

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Dust Barriers to be put in place when work is near (250 feet or less) of residences. A map of understanding can be used to determine when a dust barrier must be in place.

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26

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For the health and well-being for those who share a property line with the PSG, please add no haul traffic and no idling of any construction equipment within 250 feet of residential properties.

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27

## Noise

*Construction activities at the spreading basins would consist of the use of bulldozers and excavators that would be constantly moving and would result in activities occurring near nearby sensitive receptor in less than one hour intervals; therefore, the one-hour construction noise threshold was utilized for the receptors next to the spreading basins (i.e., residential 90 dBA Leq for 1 hour during the daytime).*

This statement eliminates mitigation for properties with an exterior construction noise level of 82db, above the 80db threshold, where mitigation should occur. Since it is already two times the amount over the threshold (db is not linear).

28

The presumption of less than an hour of noise at a time, over an 8 hour work day, when the work will take place in a concentrated area at a time, shows a less than conservative approach, opposite of what the MND claims to do.

Adjust the threshold back to 8-hour noise threshold and mitigate accordingly. Your statement failed to prove anything.

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## Further mitigation requested

Additional noise control measure shall be implemented including: specialized mufflers or silencers, directional exhaust pipes, damping and sound absorptive material, and noise barrier for the Devonwood Park.

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29

## Difference between first and second IS/MND

The previous IS/MND not adopted, found no need to mitigate for Air Quality (which was wrong). The major scope of the project on site has not changed: removing 1.73mcy and moving 1.6mcy offsite. The same haul trucks, plans of where the trucks would enter, machinery, etc (less time on site), yet when the models were rerun mitigation is required.

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30

If the previous MND had been adopted, Tier 4 equipment would not have been a requirement, for example. The modelling air quality data for this project varies in accuracies (stated) so mitigation at the minimum adds great health risk to our communities.

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31

We deserved better. We deserve better. For starters, require 2010 and newer haul trucks (for the whole fleet).

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32

Thank you in advance for responding in kind, and for reviewing and implementing the mitigation requests.

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Elizabeth Marx  
Mission Hills Resident

**Elizabeth Marx (EM)**

**December 13, 2018**

- EM-1 Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged.
- EM-2 The purpose of the modeling of air quality emissions in the MND is not to reflect the totality of actions the LACFCD would take to minimize those emissions, but to reflect a reasonable worst-case to ensure all potential impacts are captured. From that point, mitigation measures, if required, and any other voluntary actions can be applied. The results help inform what is necessary for the LACFCD, as Lead Agency, to implement to ensure air emissions do not significantly impact the community but does not prescribe that this is all that the County can or should do. There would be less than significant impacts to air quality with implementation of MMs AQ-1 and AQ-2 based on the model parameters and assumptions applied. The facts support that regardless of the additional actions the LACFCD has committed to take beyond the mitigation measures defined in the Recirculated MND, the worst-case modeled emissions would be less than significant with MMs AQ-1 and AQ-2. As such, the requirement for 2010 or newer haul trucks and any other request is not an oversight and bears no relationship to the results of the analysis presented in the Recirculated MND.
- EM-3 The prohibition for truck loading on the perimeter road also includes truck queuing, which means a line of vehicles waiting to move forward. Additionally, Section 3-12.1.4 of contract special provisions shall restrict idling to less than five minutes per Title 13, CCR, Section 2485. In addition, all trucks shall be prohibited from idling within 100 feet from any residential area and no idling at schools. Signs shall be posted at all Project site entrances/exits and loading areas. Regarding the modeled idling time of 7.5 minutes for each truck trip end in the air quality analysis, as stated on page 3-23 of the Recirculated MND, ...“idling for 7.5 minutes is an overestimation, as the SCAQMD restricts idling to 5 minutes.” This was one of the assumptions applied to generate highly conservative air and noise analyses.
- EM-4 Please refer to Response EM-3, above.
- EM-5 Limiting of any activity within 250 feet of residential property, assumed to mean the shared property line, would be a prohibitive constraint on the Project based on the location of some of the basins and necessary excavation to improve the water conservation at the facility. Please refer to Response EM-3, above, for a description of the proposed contract special provisions related to idling. The LACFCD recognizes that proximity is an issue, and, as discussed in the Recirculated MND, would prohibit use of the perimeter road of the spreading grounds for truck loading. The Revised Air Quality, Greenhouse Gas, and Health Risk Assessment Report, updated to reflect the redefined haul routes and schedule, has determined that surrounding receptors would not be significantly impacted, based on the SCAQMD thresholds, by Project implementation as described in the Recirculated MND. This was meant to be a reasonable worst-case scenario for purposes of modeling only.
- EM-6 Air quality emissions were modeled for four different sources: on-site equipment, worker trips, demolition truck trips, and haul truck trips. The types and quantities

of on-site construction equipment (i.e., one of the four sources) used in air quality modeling with CalEEMod for criteria pollutants is intended to represent a reasonable worst-case scenario of continuous activity (over eight hours) with a combination of equipment that could occur all at one time, to estimate the maximum daily emissions related to that one source. Vehicle trips (worker, demolition, and haul trucks trips) are modeled based on the actual number of trips that would occur if construction activity were evenly divided over the course of the Project, or the same every day. This is, in turn, derived from the Revised Traffic Impact Study prepared for the Recirculated MND. The modeling parameters do not consist of the equipment combination and the intensity of construction activities on a daily level, but reflect the parameters analyzed to estimate the reasonable worst-case the maximum emissions. Regarding loaders, excavators can serve to load the haul trucks. It is noted that the type of off-road equipment modeled (e.g., dozer, loader, off-road truck) does not affect the air modeling results; the critical factors are the horsepower, load factors, and engine Tier level of the equipment operating. As such, the actual equipment used during construction of the Project may vary from the equipment assumptions described in the Recirculated MND for purposes of modeling and changing the type of equipment would not change the findings of the MND.

EM-7

Please refer to Response EM-6, above. For number of trucks idling modeled in the Recirculated MND, half of 372 18-cubic yard trucks were modeled as idling on the spreading basins all at one time for 7.5 minutes. The larger trucks have greater emissions per truck, and half the trucks were modeled as the other half would be on-road delivering soil to the pits. It is expected there would be times when more or less than half of the total haul trucks in use would be on the site at a given time, and this figure would be constantly in flux. However, given that the modeling used only 18 cy trucks as a worst-case scenario for emissions, when there was expected to be a combination of 14 cy and 18 cy trucks, the precise number of haul trucks at any one time is irrelevant to the results of the air quality modeling, because the modeling is based on a worst-case scenario. The total daily trips should not exceed the figures modeled in the Recirculated MND.

To reiterate from Response EM-6, the modeling parameters are not meant to be a specific day-to-day prescription for equipment, including haul trucks and off-road equipment. Also, the actual off-road equipment used during construction of the Project may vary from the equipment assumptions described in the Recirculated MND for purposes of modeling and changing the type of equipment would not change the findings of the MND. Signage, meeting the standards of the Rule 403 Implementation Handbook, would be installed around the Project site prior to initiating any sediment removal activities, that provides an appropriate contact person(s) and phone number(s) to call with dust-related complaints and the phone number of the SCAQMD compliance office. The signage would remain and be maintained for the length of the Project. The contractor is responsible to comply with project specifications, City permits, and County Codes.

EM-8

As discussed on page 3-16 of the Recirculated MND, "For the year 2018, the CalEEMod assumes that the on-site equipment will average at approximately a Tier 3 level; however, that may be achieved with a mix of Tier 0, 1, 2, 3, or 4 equipment. Tiers 0 through 4 refer to off-road diesel-engine equipment with specified levels (i.e., tiers) of emissions standards for PM10 and NOx adopted by CARB, with more stringent emissions standards adopted over time corresponding to a higher tier number. The CalEEMod model utilizes the worst-case engine Tier

level allowed under CARB's regulations for off-road diesel equipment." This is to model a reasonable worst-case scenario, but not to prescribe the equipment.

Therefore, based on the CalEEMod methodology, the requirement for Tier 4 off-road equipment is presented as mitigation. Specifically, MM AQ-1 would require all off-road equipment greater than 50 horsepower operated on the Project site to meet Tier 4 Final emissions standards and is consistent with the County's current standard operating procedures. As stated in MM AQ-1, this requirement shall be monitored by the Construction Inspector, when inspecting the site. A LACFCD construction inspector will be at the job site during construction activities and will enforce thresholds with regards to noise, dust, and air emissions.

Additionally, the following contract special provisions have been defined for the proposed Project. The planned contract special provisions are stricter than Rule 403 and Section 23114 of the California Vehicle Code:

- Section 3-12.1.2 shall require all trucks used for transporting all excavated material shall meet the United States Environmental Protection Agency's emission standards for model year 2013 or newer.
- Section 3-12.1.3 shall require all off-road diesel-powered construction equipment greater than 25 hp shall meet, at a minimum, the United States Environmental Protection Agency emission standards for Tier 4 equipment.
- Section 3-12.1.4 shall restrict idling to less than five minutes per Title 13, CCR, Section 2485. In addition, all trucks shall be prohibited from idling within 100 feet from any residential area and no idling at schools. Signs shall be posted at all Project site entrances/exits and loading areas.
- Per Section 3-12.1.4, the Contractor is subject to the South Coast Air Quality Management District (SCAQMD) Rule 203 Permit to Operate. The Contractor shall provide proof of compliance prior to mobilizing equipment.
- Per Section 3-12.1.4, the Contractor shall maintain and operate construction equipment to minimize exhaust emissions.
- Per Section 3-12.1.5, Street sweepers shall be compliant with SCAQMD Rules 1186 and 1186.1.
- Per Section 3-12.1.5, the Contractor's SCAQMD-certified Fugitive Dust Control Supervisor shall prepare a Fugitive Dust Control Plan.
- Per Section 3-12.2.2, the Contractor shall comply with SCAQMD Rule 402 and Rule 403 Large Operations, shall comply with SCAQMD Rule 403 requirements for wind gusts over 25 miles per hour (mph), all haul trucks shall be covered (no exceptions). Section 3-12.2.2 of the contract special provisions are stricter than Rule 403 and California Vehicle Code 23114. Details will be included in the Fugitive Dust Control Plan.
- Per Section 3-12.2.3, the Contractor shall be required to submit a comprehensive inventory of all off-road diesel-powered construction equipment, on-road diesel haul trucks, street sweepers, generators and all other owned, and leased equipment/vehicles, including those of Subcontractors, suppliers, and brokers. The inventory shall include the certification documents, executive orders issued from the California Air Resources Board (CARB) identifying the tier rating, horsepower rating,

engine production year, and emissions data. No equipment shall be allowed on site that does not meet these requirements or has not submitted documentation.

- In addition, the Contractor shall be required to provide monthly reports to the LACFCD Engineer. The Engineer will verify that all off-road diesel-powered construction equipment and haul trucks meet the required standards.

Additionally, based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM10; the requirements for this monitoring will be included in the Contractor specifications.

EM-9

The methodology used to measure to distances from the sensitive receptors is described in page 2-5 of the 2016 MND and page 3-10 of the Recirculated MND. The measurements are the shortest distance from the disturbance area on the Project site to the nearest structure (for residences and the church) and the nearest use area (for parks, as these have no structures). Disturbance refers to excavation, vehicle traffic, and other construction activity that would disturb the ground surface. It should be noted the nearest disturbance area is not necessarily the edge of the County-owned property. The Project would disturb most, but not all, of the site; there are areas around the perimeter of the spreading basins that would not be disturbed by Project implementation (page 3-10 of the Recirculated MND). Further, based on public feedback, the LACFCD would prohibit use of the perimeter road of the spreading grounds for truck loading. The distance is ascertained through measurement on aerial maps, such as Google Earth, and is considered accurate and adequate for purposes of modeling air and noise effects of a project.

EM-10

SCAQMD has divided the South Coast Air Basin into 38 air-monitoring areas with a designated ambient air monitoring station representative of each area. The Project site is located in air monitoring area 7, which is located in East San Fernando Valley and covers the area from the Hollywood Hills to San Fernando. The nearest air monitoring station to the Project site is the Burbank West Palm Avenue Monitoring Station (Burbank Station), which is located approximately six miles southeast of the Project site at 228 W. Palm Avenue, Burbank and is the nearest SCAQMD-designated station at the time the air quality modeling for the Project was prepared. SCAQMD-designated stations are those acceptable for use in CalEEMod.

The CalEEMod model utilizes specially processed meteorological data that is prepared and verified by SCAQMD. The parameters applicable to the Project area (i.e., Los Angeles-South Coast) are defined by SCAQMD, and are based on substantial evidence. As such, the assertion that the modeling results are inaccurate because the air monitoring station used in the analysis is not precisely reflective of the Project site is unsubstantiated. Therefore, the Burbank Station is the appropriate air monitoring station to use in the air quality modeling for the Project. Further, the air modeling results are based on the worst-case meteorological conditions over a 5-year period, so the results likely overestimate what occur in a typical construction day.

EM-11

The land use categories in CalEEMod represent the proposed action, rather than the existing land use at the location of a project. For the Project, the category of "User Defined Industrial" was selected as it is the most accurate representation of



the Project's activity. Also, among the Industrial category of land uses in CalEEMod, User Defined Industrial was selected as it provides the most flexibility in model parameters and ability to change defaults to accurately represent what is projected to occur onsite.

- EM-12 As discussed in Response EM-8, above, "For the year 2018, the CalEEMod assumes that the on-site equipment will average at approximately a Tier 3 level; however, that may be achieved with a mixture of Tier 0, 1, 2, 3, or 4 equipment. Tiers 0 through 4 refer to off-road diesel-engine equipment with specified levels (i.e., tiers) of emissions standards for PM10 and NOx adopted by CARB, with more stringent emissions standards adopted over time corresponding to a higher tier number. The CalEEMod model utilizes the worst-case engine Tier level allowed under CARB's regulations for off-road diesel equipment" (page 3-16 of the Recirculated MND). This is to model a reasonable worst-case scenario, but not to prescribe the equipment. Therefore, based on the CalEEMod methodology, the requirement for Tier 4 off-road equipment is presented as mitigation. Specifically, MM AQ-1 would require all off-road equipment greater than 50 horsepower operated on the Project site to meet Tier 4 Final emissions standards and is consistent with the LACFCD's current standard operating procedures.
- EM-13 The 169 acres represents the total number of acres that would be disturbed over the course of the Project for purposes of the air quality modeling. This is a conservative input as not all of the 169-acre site would be disturbed, but results in a worse (i.e., more conservative) outcome in the model.
- EM-14 It is unknown where the commenter found that one of the air models used a wind speed of 4.4 miles per hour(mph). The Recirculated MND and Revised Air Quality Report, and 2016 MND and Air Quality Report, were searched for "4.4" and no reference to wind speed was found and it is not a user input available to any of the air models used. Regardless, the CalEEMod and AERMOD models use specially processed meteorological data that is prepared and verified by SCAQMD. The CalEEMod model applied Climate Zone 12, which represents the climate/meteorological conditions found in zip code 91352 (the zip code of the community of Sun Valley in the City of Los Angeles). Climate Zones in CalEEMod are selected in addition to the climate defaults and are looked up by zip code. Therefore, the climate data used is relevant to the Project area as well as being consistent with California Air Resource Board (CARB) methodology for CalEEMod. The parameters applicable to the Project area (i.e., Los Angeles-South Coast) are defined by SCAQMD, and are based on substantial evidence. As such, it is not possible, or advised, to use alternate setting data into the model. Further, as discussed in Response EM-10, above, the air modeling results are based on the worst-case meteorological conditions over a 5-year period, so the results likely overestimate what occur in a typical construction day.
- EM-15 The data in Table E is from the Western Regional Climate Center, which keeps the official weather data for California. Although there are several other institutions that monitoring the weather, the Recirculated MND has relied on the data from the nearest official (i.e., SCAQMD-designated) weather station with a complete data set. It should also be noted that the information provided in Table E was only utilized for informational purposes to describe the existing weather conditions and was not used in any of the air model runs.

EM-16 The local air modeling was conducted according to the procedures detailed in Final Localized Significance Threshold Methodology, prepared by SCAQMD, dated July 2008. The Methodology states “It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.” As such, the use of the 25 meter or 82 feet distance follows the Methodology provided by SCAQMD. The placement of the emissions sources as six separate point sources around the perimeter of the Project site was chosen in order to provide a reasonable worst-case estimate of emissions created from the Project site. The request that all equipment and haul trucks be modeled in a five-acre area placed in the closest proximity possible to the sensitive receptors is not a reasonable data assumption, as it is highly unlikely that that scenario would ever occur on a 169-acre Project site.

EM-17 The Contractor would be required to comply with all applicable requirements of SCAQMD Rule 403 including additional requirements for large operations (RR AQ-1), such that a nuisance (Rule 402) is not created. This would include preparation of a Fugitive Dust Control Plan. However, as per standard operating procedures for the County, the Rule 403-compliant Fugitive Dust Control Plan will be prepared by the selected contractor. The Fugitive Dust Control Plan must be submitted for review and approval by the LACFCD before Project initiation.

It is noted that implementation of fugitive dust control, including coordination with SCAQMD, would be required of the Project regardless of the CEQA process, and is therefore not required to be defined to assess the impacts of a project. The list of specific dust control measures that a project, if approved, will enact to achieve appropriate dust control is generally determined subsequent to the CEQA process. Based on public comments on the 2016 MND, additional detail has been added to RR AQ-1 in the Recirculated MND regarding anticipated contractor requirements for management of fugitive dust on the spreading grounds and within the haul trucks under Rule 403. In addition to a Fugitive Dust Control Plan, Contractor compliance with Rule 403 requirements would include, but not be limited to:

- A Dust Control Supervisor, that possesses a current certification from SCAQMD, would be designated. The Dust Control Supervisor would be responsible for preparing the Dust Control Plan.
- Signage, meeting the standards of the Rule 403 Implementation Handbook, would be installed around the Project site prior to initiating any sediment removal activities. The signage would provide a contact person and phone number to call with dust-related complaints and the phone number of the SCAQMD compliance office. The signage would remain and be maintained for the length of the Project.
- Daily inspections would be conducted by the Dust Control Supervisor, and specific dust control actions would be documented on the SCAQMD Inspections form from the Rule 403 Implementation Handbook.
- Watering exposed surfaces at least three times per day or more during windy conditions. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour.
- Fugitive dust would be controlled during after-hours through the implementation of Best Available Control Measures (BACM) identified in SCAQMD Rule 403 and the Fugitive Dust Control Plan. Non-toxic soil

stabilizers/dust suppressants, resistant to wind erosion, that create a crust on the surface may be selected and applied consistent with Rule 403.

- Traffic speeds on unpaved roads would be restricted to no more than 15 miles per hour.
- One or more devices would be installed at ingress/egress points to remove dirt from vehicle tires and undercarriage prior to leaving the site.
- All materials to be loaded for export would be pre-watered.
- All haul trucks would be covered (with on board tarp).

Stockpiles may have non-toxic soil stabilizers/dust suppressants that create a crust on the surface to be resistant to wind erosion would be selected and applied consistent with Rule 403. The number and location of any stockpiles would change on a day-to-day basis. Regardless, there is no limitation on stockpiling as long as dust generation is managed in compliance with Rule 403. As noted above, in the event someone in the community experiences dust that is affecting their person or property, signage would be installed around the Project site with contact information for dust complaints and for the SCAQMD.

EM-18 The requirements for Rule 403 include management of fugitive dust generation when construction activity is not occurring on a site. This is achieved through things such as, but not limited to, application of soil stabilizers and covering stockpiles. Per 3-12.1.5 of the contract special provisions, the requirements Rule 402 and 403 Large Operations shall be implemented throughout the duration of the Contract, including any temporary suspension of the work, designated construction moratoriums, weekends and holidays. In the event someone in the community experiences dust that is affecting their person or property outside of work hours, signage would be installed around the Project site with contact information for dust complaints and for the SCAQMD.

EM-19 Please refer to Responses EM-2 and EM-8, above. To reiterate, the purpose of the modeling of air quality emissions in the MND is not to reflect the totality of actions the LACFCD would take to minimize those emissions, but to reflect a reasonable worst-case to ensure all potential impacts are captured. From that point, mitigation measures, if required, and any other voluntary actions can be applied. Regarding haul trucks, Section 3-12.1.2 of contract special provisions shall require all trucks used for transporting all excavated material shall meet the United States Environmental Protection Agency's emission standards for model year 2013 or newer. As such, the air quality analysis methodology in the Recirculated MND is consistent with the standards and requirements of both SCAQMD and the State CEQA Guidelines.

EM-20 Please refer to Response EM-19, above.

EM-21 The LACFCD would prepare a Fugitive Dust Plan consistent with all requirements of Rule 403. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour. The Fugitive Dust Plan would specify actions to be implemented under high wind conditions. In some circumstances, this may include a work stoppage.

EM-22 Please refer to Response EM-5, above.

- EM-23 A LACFCD construction inspector will be at the job site during construction activities and will enforce thresholds with regards to noise and air emissions, including dust. Because air quality emissions and health risk would be less than significant with implementation of MMs AQ-1 and AQ-2, ambient air monitoring stations on the site during construction activity is not required. However, all complaints made to the on-site contact, whose information will be placed on signage along the Project site, will be investigated. Further, based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM10; the requirements for this monitoring will be included in the Contractor specifications.
- EM-24 Please refer to Response EM-17, above. To reiterate, fugitive dust control consistent with Rule 403 includes watering exposed surfaces at least three times per day, or more during windy conditions. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour. Also, consistent with SCAQMD Rule 403, traffic speeds on unpaved roads would be restricted to no more than 15 miles per hour.
- EM-25 Preparation of the 2016 MND involved the preparation of a Health Risk Assessment for emissions of fugitive dust (PM10 and PM2.5) and diesel particulates (see Section 3.3, Air Quality, of the 2016 MND and the Recirculated MND). This assessment has been updated based on the redefined haul routes and construction hours. Consistent with the findings of the 2016 MND, the Project would result in a less than significant cancer risk, non-cancer chronic health risk, and non-cancer acute health risk. The modeled air quality is based on exterior conditions; interior air conditions can be better or worse (depending on interior sources of pollutants such as smoking) than exterior conditions. However, the interior air quality due to Project implementation would be the same or better than the exterior air quality such that air filters/HEPA filters would not be necessary.
- EM-26 With regard to dust barriers, mitigation (MM NOI-1) was required to build a sound wall to reduce a noise impact along the headworks prior to construction activity in this area (refer to pages 3-72 and 3-73 of the Recirculated MND. Based on public feedback, the LACFCD has opted the also install the sound wall along the private-facing perimeter (i.e., where the spreading basins abut private land uses). The sound wall would be at least eight feet high and would be installed prior to construction activities. The sound wall would also reduce transmission of any particles entrained in the air.
- EM-27 Please refer to EM-5, above.
- EM-28 The one-hour noise level refers to a steady state, or constant, equivalent noise level for that period of time. The inherent nature of the proposed activities in the spreading basins result in the construction equipment moving around, as well as stopping and starting, within a localized area (e.g., part of one basin) for a period of time, and then another, and eventually moving over the entirety of the spreading grounds, which are quite large. Therefore, the volume of construction noise would be highly variable over each hour and each day at each receptor. Whereas in the headworks area, construction activity would be confined to only the existing channel area and all noise generation would emanate from within a narrow geographic area. Hence the more restrictive noise level standard was applied for this area of the Project site, rather than applying one standard for all areas.

It is noted that while it is true that A-weighted noise levels are measured on a logarithmic scale, a noise level of 82 dBA  $L_{eq}$  is not twice the applied threshold. Specifically, a doubling of a noise level of 80 dBA is 100 dBA; the 20 dBA difference represents an increase in sound energy (which creates the noise) of 100 times (i.e., 10 times 10). It is also noted that the modeled noise levels generally overestimate the actual noise levels that would be experienced and represent the highest noise level at the closest point to a receptor based on the expected construction scenario. As such, all noise levels further from a receptor would be less than the estimated noise level. Noise attenuates (lessens) at a rate of approximately 6 dBA per doubling of distance over a hard surface; the noise attenuation rate is greater over a soft surface such as soils. For the reasons discussed above, the thresholds applied are appropriate to the circumstances of the Project.

- EM-29 The Contractor specifications would include equipment and process requirements to minimize noise to the extent feasible based on technology, cost, and schedule constraints. All feasible measures to manage noise generation, that still allow the Project to be completed in a timely fashion, would be implemented. It is noted that adding additional specialized mufflers, silencers, or directional exhaust pipes may affect the performance of the emission control systems on the Tier 4 equipment and 2010 model year engines of the hauls trucks. Mitigation (MM NOI-1) was required to build a sound wall to reduce a noise impact along the headworks prior to construction activity in this area (refer to pages 3-72 and 3-73 of the Recirculated MND. Based on public feedback, the LACFCD has opted to also install the sound wall along the private-facing perimeter (i.e., where the spreading basins abut private land uses). This includes the segment of the site abutting Devonwood Park. The sound wall would be at least eight feet high and installed prior to construction activities.
- EM-30 Based on the assumptions and parameters used in the air quality modeling in the 2016 MND, the results of that analysis were accurate. Every aspect of the air modeling was reviewed in the preparation of the Recirculated MND. Subsequent to preparation of the 2016 MND, the SCAQMD released an updated version of CalEEMod. The results of CalEEMod differs from version to version for the same inputs because each version fine-tunes the modeling process. Additionally, the revisions to the Project resulted in some modeling assumptions being revised. For instance, when all sediment was analyzed as being disposed at the Vulcan Pits, the distance to these facilities is approximately 5.7 miles. In the revised Project, a portion of the sediment is being disposed at Sunshine Canyon Landfill, the distance to this facility is approximately 8 miles. The change in mileage resulted in a significant impact for regional emissions for nitrogen oxides (NO<sub>x</sub>). As such, a new mitigation measure (MM AQ-1) was required to reduce the significant impact identified for the Project, as currently proposed.
- EM-31 As discussed in Response EM-1, above, the purpose of the modeling of air quality emissions in the MND is not to reflect the totality of actions the LACFCD would take to minimize those emissions, but to reflect a reasonable worst-case to ensure all potential impacts are captured. From that point, mitigation measures, if required, and any other voluntary actions can be applied. The results help inform what is necessary for the LACFCD, as Lead Agency, to implement to ensure air emissions do not significantly impact the community but does not prescribe that this is all that the LACFCD can or shall do. There would be less than significant impacts to air quality with implementation of MMs AQ-1 and AQ-2 based on the model

parameters and assumptions applied. The facts, as discussed in the MND, support that regardless of the additional actions the LACFCD has committed to take beyond the mitigation measures defined in the Recirculated MND, the worst-case modeled emissions would be less than significant with MMs AQ-1 and AQ-2. As such, the requirement for 2010 or newer haul trucks and any other request bears no relationship to the results of the analysis presented in the Recirculated MND.

As discussed in Response EM-10, above, the CalEEMod model utilizes specially processed meteorological data that is prepared and verified by SCAQMD. The parameters applicable to the Project area (i.e., Los Angeles-South Coast) are defined by SCAQMD, and are based on substantial evidence. As such, the assertion that the modeling results are inaccurate because the air monitoring station used in the analysis is not precisely reflective of the Project site is unsubstantiated. Therefore, the Burbank Station is the appropriate air monitoring station to use in the air quality modeling for the Project. Further, the air modeling results are based on the worst-case meteorological conditions over a 5-year period, so the results likely overestimate what occur in a typical construction day.

EM-32            This comment is acknowledged.



Attention: Ernesto Rivera  
County of Los Angeles  
Department of Public Works  
Water Resources Division  
900 South Fremont Avenue  
Alhambra, CA 91803

December 13, 2018

**SM**

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This is in response to Recirculated Initial Study/Mitigated Negative Declaration (MND) Pacoima Spreading Grounds Improvement Project (PSG).

1

After reading through the IS/MND and appendices, there are clarifications needed in the data assumptions and modelling parameters used in the IS/MND. In addition, further mitigation is needed for community safety.

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page 10 , 1.4 SENSITIVE RECEPTORS

Please clarify how these distances from the PSG and sensitive receptors were calculated. Please clarify why property lines were not used, if they were not, as that is the measurement of distance used in the SCAQMD Rule 403 and SCAQMD Rule 402. Please clarify, if property lines were not used for modeling, but was for mitigation per the SCAQMD Rule 403. Please clarify if the perimeter road was included or excluded in the measured distance.

The measurements used to describe the distances from sensitive receptors to the PSG, should be consistent. If the haul trucks, construction trucks, and construction equipment both fixed and mobile will be using the perimeter road, then the road should be included in the project work site. The perimeter road is less than 10 feet away from most of the residential property lines.

2

1.5-1.7 Air Quality

Note this document references a section, Sensitive Receptors, which are detailed above in Section 1.4, Project Components and the objections are detailed in that section.

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Referencing Regulatory Requirements, "All construction activities shall be conducted in compliance with all applicable South Coast Air Quality Management District (SCAQMD) rules and permitting requirements, including SCAQMD Rule 403 and SCAQMD Rule 402."

There needs to be a more detailed plan for SCAQMD Rule 403 and SCAQMD Rule 402 mitigation than what is included in Appendix A; Air Quality, Greenhouse Gas Emissions, and Health Risk Assessment Impact Analysis (Air Quality Report) dated August 2015 and prepared by Vista Environmental (Vista 2015a). PSG is a project of over 50 acres and as stated, will likely qualify as a large operation. As a large operation they are required to do more mitigation, maintain daily records to document specific dust control issues, and monitor wind speeds with onsite anemometers. This MND does not specifically address the issues and

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3

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mitigation measures to be implemented to deal with fugitive dust issues arising from:

- wind gusts that exceeds 25 mph
- open storage piles
- backfill material (approximately 290,000 cubic yards) both when stockpiled and when actively handling the material
- the planned operation of sifting 1,600,000 cubic yards of material on site
- disturbed soil and earth moving material stabilization during activities and when inactive (specifically how they will mitigate the fugitive dust from the disturbed soil, disturbed surface area, stockpiles of bulk material awaiting screening or transport offsite, and inactive disturbed areas, and open storage piles)

3 cont.

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This MND does not adequately outline the SCAQMD Rule 403 mitigation measures that would be required to fulfill the requirements. The mitigation addressed is for the haul routes and does not address the requirements necessary for the sensitive receptors that abut and share a property line with the project. While these sensitive receptors will not be affected for the entire timeline of the project, they will be affected for significant amounts of time.

4

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Excavating, sifting onsite, stockpiling or using as backfill or loading into haul trucks 1.73 million cubic yards of sediment will be a nuisance to and endanger the comfort, health and safety of the sensitive receptors who share a property line with the PSG and the sensitive receptors who live within 200 feet of the PSG. There is no specific mitigation for fugitive dust outlined in the MND or the Appendix for SCAQMD Rule 402, Nuisance, in regards to air quality without mitigation.

5

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We expect the following to be included mitigation to this project:

- Requiring all off road diesel powered construction equipment greater than 50 hp to meet the Tier 4 emissions standards as stated in the mitigation 1 of this MND and not the average Tier 3 as stated in 5.2 section. The MND has no information on how this mitigation will be checked and maintained during the project, which should be stated. What are the consequences of not running/using this equipment?
- Requiring **all** haul trucks to be 2010 or newer (not just a single truck or a percentage of the fleet.)

6

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We would like the following to be included as SCAQMD Rule 403 and SCAQMD Rule 402 mitigation to this project:

- Requiring that all construction equipment be outfitted with BACT devices certified by CARB.
  - Requiring the Construction Contractor to supply a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit at the time of mobilization of each applicable unit of equipment.
  - Requiring the contractor to maintain and operate construction equipment to minimize exhaust emissions
  - Limiting truck idling to 5 minutes, off and onsite and limited to 250 feet away from sensitive receptors
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7

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- Not permitting the use of the perimeter road by any truck, vehicle or construction equipment. As this road runs less than 25 feet from the property line shared by the PSG and sensitive receptors, this would keep any construction equipment or haul trucks from idling within 250 feet of residences from sensitive receptors and will also keep road dust at a minimum
  - Using street sweepers that comply with SCAQMD Rules 1186 and 1186.1

7 cont.

- Requiring that, where possible, construction equipment will obtain power from the power poles rather than the use of temporary diesel or gasoline powered generators.,
- Having a High Wind Fugitive Dust Control Plan prepared and implement when wind speeds exceed 25 mph.
- Providing, free of charge, HEPA filters and weather striping to help sensitive receptors who live within 200 feet of the PSG to seal out fugitive dust and to inform the sensitive receptors how best to use them.

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Truck idling was modeled on trucks idling in the center of the basins North and South of Devonshire Street for 7.5 minutes. The MND does not state where the equipment will be located on site and where the trucks will be allowed to idle for 5 minutes. If it is not the center of the basins as in the models then it should be mitigated to reflect the results attained by using the center in the modeling or it should state that the equipment, such as the sifter which should be stationary cannot be utilized within 200 feet of sensitive receptors.

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This MND states the project will not have a significant impact with the minimum of mitigation the Los Angeles County Flood Control is willing to provide. Any impact of any level will be significant if it affects health or the ability to use your property, and should be mitigated to no impact as much as possible, especially as the sensitive individuals in question are Los Angeles County residents.

9

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The Project should mitigate by

- providing that construction contracts shall explicitly stipulate that all construction equipment shall be properly tuned and maintained and operate construction equipment to minimize exhaust emissions,
- requiring construction equipment, fixed and mobile, to be equipped with properly operating and maintained particle filters,
- requiring that idling time of diesel powered equipment be limited to two minutes and that no idling within 300 feet of residences.
- requiring the use of dust barriers when work is being done within 400 feet of residences,
- requiring that if a complaint is made, all exposure parameters must be checked at the monitoring station and if exposure exceed the limits, work stops until the problem is found and fixed.
- The project manager shall provide residences within 200 feet of the project, air filtration and HEPA filters, free of charge, and provide any updates and information as to proper use of any installed air filters to ensure the residents have good air quality for the length of the project (20 months).

10

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This project does not have to be done at the expense of the health and well being of the residents and communities around the PSG, but if the LACFCD does not explicitly put in the details that will mitigate this project into less than significant impact, it will be.

11

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Thank  
you,

Susan Milne

Mission Hills Resident

**Susan Milne (SM)**

**December 13, 2018**

SM-1 Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged.

SM-2 The methodology used to measure to distances from the sensitive receptors is described in page 2-5 of the 2016 MND and page 3-10 of the Recirculated MND. The measurements are the shortest distance from the disturbance area on the Project site to the nearest structure (for residences and the church) and the nearest use area (for parks, as these have no structures). Disturbance refers to excavation, vehicle traffic, and other construction activity that would disturb the ground surface. It should be noted the nearest disturbance area is not necessarily the edge of the County-owned property. The Project would disturb most, but not all, of the site; there are areas around the perimeter of the spreading basins that would not be disturbed by Project implementation (page 3-10 of the Recirculated MND). Further, based on public feedback, the LACFCD would prohibit use of the perimeter road of the spreading grounds for truck loading. The distance is ascertained through measurement on aerial maps, such as Google Earth, and is considered accurate and adequate for purposes of modeling air and noise effects of a project.

It is correct the SCAQMD Rule 403 refers to property lines; however, it is referring to the location at which visible dust is not permitted and can create a nuisance (SCAQMD Rule 402). Accordingly, the distance from the disturbance area to the nearest structure (for residences) is an accurate measurement for purposes of modeling the impacts of the anticipated activities on site.

SM-3 Regulatory requirements (RRs), such as RR AQ-1 that directs compliance with Rule 402 and 403, are based on local, State, and/or federal regulations or laws that are required independent of CEQA review, yet also serve to offset or prevent certain impacts. Because RRs are required to be part of a project's design or implementation and are separate from the CEQA process, they do not constitute mitigation measures (MMs). Mitigation measures are only required and implemented if there are significant impacts identified after application of all applicable regulations. Implementation of fugitive dust control, including coordination with SCAQMD, would be required of the Project regardless of the CEQA process, and is therefore not required to be defined to assess the impacts of a Project. The list of specific dust control measures that a project, if approved, will enact to achieve appropriate dust control is generally determined subsequent to the CEQA process.

The Contractor would be required to comply with all applicable requirements of SCAQMD Rule 403 including additional requirements for large operations (RR AQ-1), such that a nuisance (Rule 402) is not created. This would include preparation of a Fugitive Dust Control Plan. However, as per standard operating procedures for the County, the Rule 403-compliant Fugitive Dust Control Plan will be prepared after contracting by the selected contractor. The Fugitive Dust Control Plan must be submitted for review and approval by the LACFCD before Project initiation.

Based on public comments on the 2016 MND, additional detail has been added to RR AQ-1 in the Recirculated MND regarding anticipated contractor requirements

for management of fugitive dust on the spreading grounds and within the haul trucks under Rule 403. In addition to a Fugitive Dust Control Plan, Contractor compliance with Rule 403 requirements would include, but not be limited to:

- A Dust Control Supervisor, that possesses a current certification from SCAQMD, would be designated. The Dust Control Supervisor would be responsible for preparing the Dust Control Plan.
- Signage, meeting the standards of the Rule 403 Implementation Handbook, would be installed around the Project site prior to initiating any sediment removal activities. The signage would provide a contact person and phone number to call with dust-related complaints and the phone number of the SCAQMD compliance office. The signage would remain and be maintained for the length of the Project.
- Daily inspections would be conducted by the Dust Control Supervisor, and specific dust control actions would be documented on the SCAQMD Inspections form from the Rule 403 Implementation Handbook.
- Watering exposed surfaces at least three times per day or more during windy conditions. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour.
- Fugitive dust would be controlled during after-hours through the implementation of Best Available Control Measures (BACM) identified in SCAQMD Rule 403 and the Fugitive Dust Control Plan. Non-toxic soil stabilizers/dust suppressants, resistant to wind erosion, that create a crust on the surface may be selected and applied consistent with Rule 403.
- Traffic speeds on unpaved roads would be restricted to no more than 15 miles per hour.
- One or more devices would be installed at ingress/egress points to remove dirt from vehicle tires and undercarriage prior to leaving the site.
- All materials to be loaded for export would be pre-watered.
- All haul trucks would be covered (with on board tarp).

Based on public comments on the Recirculated MND, the Contractor specifications for Rule 403 compliance shall state that all haul trucks will be covered with an on-board tarp. The alternate means of limiting dust generation from trucks of maintaining two feet or more of freeboard will not be an option. The text of RR AQ-1 has been edited accordingly in Section 4.0, Clarifications, of this document.

Based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM10; the requirements for this monitoring will be included in the Contractor specifications.

SM-4

With regard to Rules 402 and 403, please refer to Response SM-3, above. It is unclear what “The mitigation addressed is for the haul routes” refers to. Whether the RR AQ-1 (i.e., Rule 403) discussed in Response SM-3, above, or the mitigation measures (MMs) AQ-1 and AQ-2, the actions described in these requirements apply to both construction activity on the Project site and the haul truck traffic.



SM-5

It is unclear where the figure of 1.73 million cubic yards (cy) of sediment was derived. It is inferred this may have been an inadvertent transposing of the figure of 1.37 million cy, which is the approximate volume of soil that would be exported from the Project site. Regardless, it is agreed this volume of sediment handling has the potential to result in significant air quality impacts. As such, a detailed analysis, which included the Revised Air Quality, Greenhouse Gas Emissions, and Health Risk Assessment Report (Revised Air Quality Report) was undertaken, including quantitative assessment of regional and local emissions, and dispersion modeling (i.e., Health Risk Assessment).

The Revised Air Quality Report determined that, even with compliance with Rule 403, based on the evaluation of the revised Project schedule and haul routes, a new significant impact related to local (but not regional) emissions of particulate matter with a diameter of 10 microns or less (PM10) – a class of fugitive dust – was identified. Therefore, the Recirculated MND includes two new mitigation measures (MMs) to reduce criteria pollutant emissions, as presented below. MM AQ-1 requires all off-road equipment greater than 50 horsepower operated on the Project site to meet Tier 4 Final emissions standards. While this is required to reduce regional emissions of nitrous oxides (NOx) to a less than significant level, it also serves to reduce PM10. MM AQ-2 requires that the tops of the central levees, which run in a northeast-southwest direction, be paved or surfaced with a Roadway Mat System that is not less effective than a paved road at controlling fugitive dust emissions. The pavement and/or mat system must be installed prior to the start of hauling activities. With implementation of MMs AQ-1 and AQ-2, dispersion modeling results included in the Recirculated MND show that local emissions of PM10 would be reduced to below the SCAQMD threshold, and therefore be less than significant with mitigation.

**MM AQ-1** The Los Angeles County Flood Control District (LACFCD) shall include in the Contractor specifications the requirement that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 Final emissions standards. To provide evidence that the equipment is the appropriate tier, it shall be registered with the California Air Resources Board and have a label detailing that the equipment meets Tier 4 emissions standards. This requirement shall be monitored by LACFCD's on-site Construction Inspector, when inspecting the site.

**MM AQ-2** Prior to the start of haul truck operations, the Los Angeles County Flood Control District (LACFCD) shall include in the Contractor specifications the requirement that the top of the central levee spanning the spreading grounds in a northeast-southwest direction be paved or a Roadway Mat System that is no less effective than a paved road at controlling fugitive dust emissions, be installed. In order to eliminate an adequate amount of unpaved surface to reduce dust emissions to a less than significant level, the paving or Roadway Mat System shall be of sufficient length to cover the greater of either: (1) a minimum of 25 percent of the total off-road path length being utilized by the haul trucks within the spreading grounds; or (2) a minimum of 660 linear feet of the paving or Roadway Mat System. The paving or Roadway Mat System shall be routinely inspected and maintained by the Contractor as often as needed to ensure the integrity of the surface and eliminate

fugitive dust emissions from the off-road segments with this treatment. The haul truck drivers shall be directed to drive on the paving or Roadway Mat System exclusively unless there is no feasible alternative. The condition and use of the paved/matted levee roads shall be monitored by LACFCD's on-site Construction Inspector when inspecting the site.

With regard to Rules 402 and 403, please refer to Response SM-3, above. As noted, this is a regulatory requirement and would be required independent of CEQA. With appropriate implementation of Rule 403 (fugitive dust) and any mitigation measures that are required for fugitive dust emissions, it is expected that Rule 402 (nuisance) would not be violated. The Revised Air Quality Report identified that after application of Rule 403, there would be a significant impacts and mitigation (MMs AQ-1 and AQ-2) would be required. Both MM AQ-1 and MM AQ-1 would reduce fugitive dust emissions.

SM-6

As discussed on page 3-16 of the Recirculated MND, "For the year 2018, the CalEEMod assumes that the on-site equipment will average at approximately a Tier 3 level; however, that may be achieved with a mixture of Tier 0, 1, 2, 3, or 4 equipment. Tiers 0 through 4 refer to off-road diesel-engine equipment with specified levels (i.e., tiers) of emissions standards for PM10 and NOx adopted by CARB, with more stringent emissions standards adopted over time corresponding to a higher tier number. The CalEEMod model utilizes the worst-case engine Tier level allowed under CARB's regulations for off-road diesel equipment." This is to model a reasonable worst-case scenario, but not to prescribe the equipment. Therefore, based on the CalEEMod methodology, the requirement for Tier 4 off-road equipment is presented as mitigation. Specifically, MM AQ-1 would require all off-road equipment greater than 50 horsepower operated on the Project site to meet Tier 4 Final emissions standards and is consistent with the County's current standard operating procedures. As stated in MM AQ-1, this requirement shall be monitored by LACFCD's on-site Construction Inspector, when inspecting the site. A LACFCD construction inspector will be at the job site during construction activities and will enforce thresholds with regards to noise, dust, and air emissions.

Additionally, the following contract special provisions have been defined for the proposed Project:

- Section 3-12.1.2 shall require all trucks used for transporting all excavated material shall meet the United States Environmental Protection Agency's emission standards for model year 2013 or newer.
- Section 3-12.1.3 shall require all off-road diesel-powered construction equipment greater than 25 hp shall meet, at a minimum, the United States Environmental Protection Agency emission standards for Tier 4 equipment.
- Section 3-12.1.4 shall restrict idling to less than five minutes per Title 13, CCR, Section 2485. In addition, all trucks shall be prohibited from idling within 100 feet from any residential area and no idling at schools. Signs shall be posted at all Project site entrances/exits and loading areas.
- Per Section 3-12.1.4, the Contractor is subject to the South Coast Air Quality Management District (SCAQMD) Rule 203 Permit to Operate. The Contractor shall provide proof of compliance prior to mobilizing equipment.

- Per Section 3-12.1.4, the Contractor shall maintain and operate construction equipment to minimize exhaust emissions.
- Per Section 3-12.1.5, Street sweepers shall be compliant with SCAQMD Rules 1186 and 1186.1.
- Per Section 3-12.1.5, the Contractor's SCAQMD-certified Fugitive Dust Control Supervisor shall prepare a Fugitive Dust Control Plan.
- Per Section 3-12.2.2, the Contractor shall comply with SCAQMD Rule 402 and Rule 403 Large Operations, shall comply with SCAQMD Rule 403 requirements for wind gusts over 25 miles per hour (mph), all haul trucks shall be covered (no exceptions). Section 3-12.2.2 of the contract special provisions are stricter than Rule 403 and California Vehicle Code 23114. Details will be included in the Fugitive Dust Control Plan.
- Per Section 3-12.2.3, the Contractor shall be required to submit a comprehensive inventory of all off-road diesel-powered construction equipment, on-road diesel haul trucks, street sweepers, generators and all other owned, and leased equipment/vehicles, including those of Subcontractors, suppliers, and brokers. The inventory shall include the certification documents, executive orders issued from the California Air Resources Board (CARB) identifying the tier rating, horsepower rating, engine production year, and emissions data. No equipment shall be allowed on site that does not meet these requirements or has not submitted documentation.
- In addition, the Contractor shall be required to provide monthly reports to the LACFCD Engineer. The Engineer will verify that all off-road diesel-powered construction equipment and hauls trucks meet the required standards.

SM-7

Please refer to Responses SM-3, SM-5, and SM-6, above. As discussed, several contractor special provisions have been defined to reflect the specific concerns and requests of the community. Additional Contractor specifications may include equipment and process requirements to minimize air pollutant emissions to the extent feasible based on technology, cost, and schedule constraints. However, with implementation of MMs AQ-1 and AQ-2, there would be less than significant impact related to air quality emissions.

Limiting of any activity within 250 feet or 300 feet (per Comment SM-10) of residential property, assumed to mean the shared property line, would be a prohibitive constraint on the Project based on the location of some of the basins and necessary excavation to improve the water conservation at the facility. The LACFCD recognizes that proximity is an issue, and, as discussed in the Recirculated MND, would prohibit use of the perimeter road of the spreading grounds for truck loading. The Revised Air Quality, Greenhouse Gas, and Health Risk Assessment Report, updated to reflect the redefined haul routes and schedule, have determined that surrounding receptors would not be significantly impacted by Project implementation, based on the SCAQMD thresholds.

The 2016 MND included a Health Risk Assessment prepared for emissions of fugitive dust (PM10 and PM2.5) and diesel particulates (see Section 3.3, Air Quality, of the 2016 MND and the Recirculated MND). This assessment has been updated based on the redefined haul routes and construction hours; consistent

with the findings of the 2016 MND, the Project would result in a less than significant cancer risk, non-cancer chronic health risk, and non-cancer acute health risk. The modeled air quality is based on exterior conditions; interior air conditions can be better or worse (depending on interior sources of pollutants such as smoking) than exterior conditions. However, the interior air quality due to Project implementation would be the same or better than the exterior air quality such that air filters/HEPA filters would not be necessary.

SM-8

Regarding on-site equipment identified in the air quality modeling parameters, air quality emissions were modeled for regional and local emissions for four different sources: on-site equipment, worker trips, demolition truck trips, and haul truck trips. The types and quantities of on-site construction equipment used in air quality modeling with CalEEMod for criteria pollutants is intended to represent a reasonable worst-case scenario of continuous activity (over eight hours) with a combination of equipment that could occur all at one time, to estimate the maximum daily emissions. Vehicle trips are modeled based on the actual number of trips that would occur if construction activity were evenly divided over the course of the Project, or the same every day. The modeling parameters are not meant to be a specific day-to-day prescription for equipment. In reality, the combination of equipment and intensity of activity varies on construction sites on a daily level but would be within the parameters of the maximum emissions. The air quality modeling parameters are intended to be the typical or likely combination of emissions sources, and not a prescription for equipment or the locations of equipment. It is noted that CalEEMod modeling of regional and location emissions is a separate modeling process than dispersion modeling performed by AERMOD, as discussed in the Recirculated MND.

Similar to the discussion for air quality modeling with CalEEMod, the Health Risk Assessment used dispersion modeling (with AEROMOD) based on situating point and line sources to represent a reasonable worst-case scenario and is not meant to be a literal description of each emissions source and each receptor. For the on-site truck idling point sources, these were centrally located in the two halves of the spreading basins to represent the averaged location of all idling emissions. For number of trucks idling, half of 360 (now 372) 18-cubic yard trucks were modeled as idling on the spreading basins all at one time for 7.5 minutes. The larger trucks have greater emissions per truck, and half the trucks were modeled as the other half would be on-road delivering soil to the pits. Also, idling for 7.5 minutes is an overestimation as the SCAQMD restricts idling to 5 minutes. Section 3-12.1.4 of the contract special provisions shall restrict idling to less than five minutes per Title 13, CCR, Section 2485. In addition, all trucks shall be prohibited from idling within 100 feet from any residential area and idling at schools. Signs shall be posted at all Project site entrances/exits and loading areas. Although the point sources for dispersion modeling represent the idling emissions from haul trucks were placed near the center of the site, all off-road equipment operation was modeled in the worst-case locations, represented by six separate point sources placed around the perimeter of the spreading basins in close proximity to the nearby sensitive receptors. Based on the results on the Revised Air Quality Report and consideration of public comments, there is no evidence to support the need for further limitations on the location of any construction equipment or activity pursuant to the air quality modeling.

SM-9

The purpose of the modeling of air quality emissions in the MND is not to reflect the totality of actions the LACFCD would take to minimize those emissions, but to

reflect a reasonable worst-case to ensure all potential impacts are captured. The results help inform what is necessary for the LACFCD, as Lead Agency, to implement to ensure air emissions do not significantly impact the community but does not prescribe that this is all that the LACFCD can or shall do. As discussed in Response SM-5, above, there would be less than significant impacts to air quality with implementation of MMs AQ-1 and AQ-2. The assertion that any impact is significant as it affects health or the ability to use your property is not supported by the results of the Revised Air Quality Report, the intent of the SCAQMD Rules, and CEQA. As discussed in Response SM-6, above, all feasible actions shall be implemented to minimize the effects of the Project on the surrounding community. The analysis of air quality presented in the Recirculated MND provides substantial evidence that there would be less than significant impacts with implementation of identified mitigation.

SM-10 Please refer to Responses SM-3, SM-5, and SM-6, above, regarding actions planned during construction. With regard to dust barriers, mitigation (MM NOI-1) was required to build a sound wall to reduce a noise impact along the headworks prior to construction activity in this area (refer to pages 3-72 and 3-73 of the Recirculated MND). Based on public feedback, the LACFCD has opted to also install the sound wall along the private-facing perimeter (i.e., where the spreading basins abut private land uses). The sound wall would be at least eight feet high and would be installed prior to construction activities. The sound wall would also reduce transmission of any particles entrained in the air.

Because air quality emissions and health risk would be less than significant with implementation of MMs AQ-1 and AQ-2, ambient air monitoring stations on the site during construction activity is not required. However, all complaints made to the on-site contact, whose information will be placed on signage along the Project site, will be investigated. Further, based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM<sub>10</sub>; the requirements for this monitoring will be included in the Contractor specifications.

The 2016 MND included a Health Risk Assessment prepared for emissions of fugitive dust (PM<sub>10</sub> and PM<sub>2.5</sub>) and diesel particulates (see Section 3.3, Air Quality, of the 2016 MND and the Recirculated MND). This assessment has been updated based on the redefined haul routes and construction hours, and consistent with the findings of the 2016 MND, the Project would result in a less than significant cancer risk, non-cancer chronic health risk, and non-cancer acute health risk. The modeled air quality is based on exterior conditions; interior air conditions can be better or worse (depending on interior sources of pollutants such as smoking) than exterior conditions. However, the interior air quality due to Project implementation would be the same or better than the exterior air quality such that air filters/HEPA filters would not be necessary.

SM-11 Please refer to Responses SM-2 through SM-10, above. Implementation of the Project would not occur at the expense of the health and wellbeing of the community. It is noted that details of the mitigation required, based on modeling a conservative, worst-case scenario to reduce the potential impact to a less than significant level are provided in the Recirculated MND.

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November 30, 2018

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SpreadingGrounds@dpw.lacounty.gov

RE: Pacoima Spreading Grounds Improvement Project

Hi there Mr. Ernesto Rivera,

JR1

---

I attended the public meeting that took place on November 29, 2018 at the Laborers' Local 300 Union Hall located at 14800 Devonshire Street, Mission Hills, CA 91345.

As a homeowner at 9931 Gullo Avenue in Arleta, I want to express a sense of urgency to include an upgraded fence on the Pacoima Spreading Grounds' (PSG) **Filmore Street and Woodman Avenue** perimeter. Los Angeles County Public Works staff indicated that an upgraded fence would be installed for the Devonshire Street perimeter but that there were no such plans for the entire perimeter of the PSG.

1

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My property abuts an alley (between Gullo Avenue and Woodman Avenue) and homeless people, criminals, and other vagabonds constantly employ the alley in search of valuables whether they come from homeowners' trash can receptacles on garbage collection day or from breaking and entering into private residences. This same alley also leads to the spreading grounds' gate access at Filmore Street, whereupon the spreading grounds have also been used as a means for shelter by homeless individuals (in the water channel openings) or as hiding grounds by would-be criminals.

The current fence has been breached and is in a deplorable state. The gate access to the spreading grounds at Filmore Street has been damaged and vandalized numerous times. A stronger fence is needed as mentally ill/homeless/drug addicts/criminal individuals have constantly kicked or cut the fence in order to gain entry.

2

At the moment there is an unpermitted street taco vendor at the corner of Filmore Street and Woodman Avenue, on the unpaved portion of this corner, that has on a *nightly* basis been dumping: grease, soap scum, food vending residuals, and other unknown chemicals directly into the ground that is adjacent to the PSG site **since the Fall of 2016**. No prosecution of the owner(s)/operators of

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the taco stand (for environmental contamination or other) has taken place otherwise and the soil has a stench of grease and other abominable odors despite several equipment confiscation occasions when the Los Angeles County Health Department intervened.

---

**2 cont.**

Arleta residents strongly urge that an upgraded fence be included for both the Filmore Street and Woodman Avenue side. Photos of the current state of the PSG as it relates to its adjacency to the streets in the aforementioned have been included as well as a map of where the primary upgraded fence should be considered for inclusion into the PSG improvement project. I cannot speak for residents of Mission Hills *but I am sure they would also want an upgraded fence* as well as they are not immune to the same calamities that Arleta residents have been experiencing with homeless, mentally ill people, and thugs. **All pictures were taken on December 2, 2018.**

**3**

A map accompanies this correspondence to illustrate where the location of the additional primary upgraded fence should be installed. Mission Hills . . . their perimeter has been illustrated by a hash line as a secondary fence urgency but by no means does that indicate that a need is any lesser than the need on the Arleta side. However, from personal experience I can attest to the constant trespassing of the spreading grounds on the Arleta side as I live about 300 feet away from the project site.

---

Sincerely,

Jesus Ramos

Pictures of the fence at gate access, breach, and deterioration of fence:



At Filmore St side near Woodman Avenue.

3 cont.



Breached fence at the end of Filmore Street (dead end street) past Woodale Avenue.

Picture 1

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Breached fence at Filmore Street (dead end street) past Woodale Avenue

3 cont.

Picture 2.



Dumped garments and trash on spreading grounds property Woodman Avenue side.





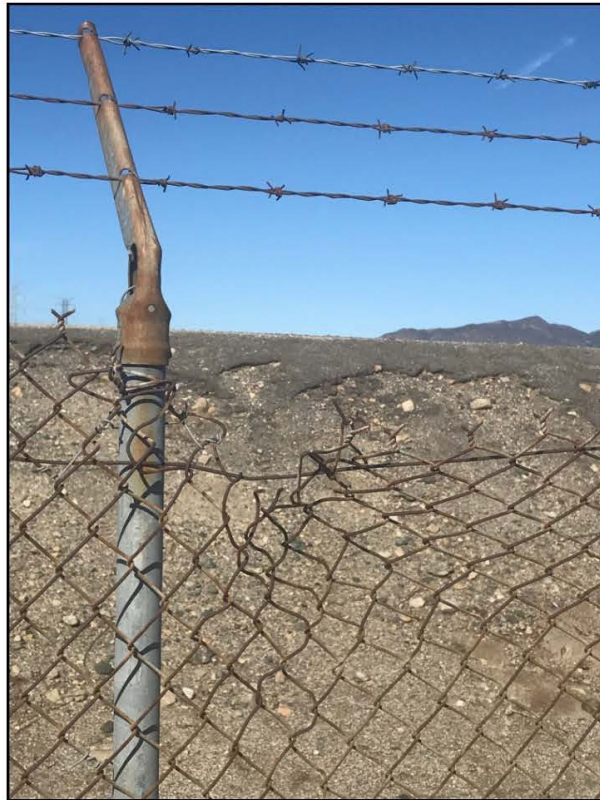
Styrofoam cooler and trash from individuals drinking beer or other in vicinity, Woodman Avenue side.

3 cont.



Broken barb wire holder at fence on Filmore Street side.

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3 cont.

Point used for climbing/stepping on fence to trespass into the spreading grounds, Filmore Street side.



Missing barb-wire at fence at 10230 Woodman Avenue, Mission Hills, CA. Devonwood Park, innermost corner.





3 cont.

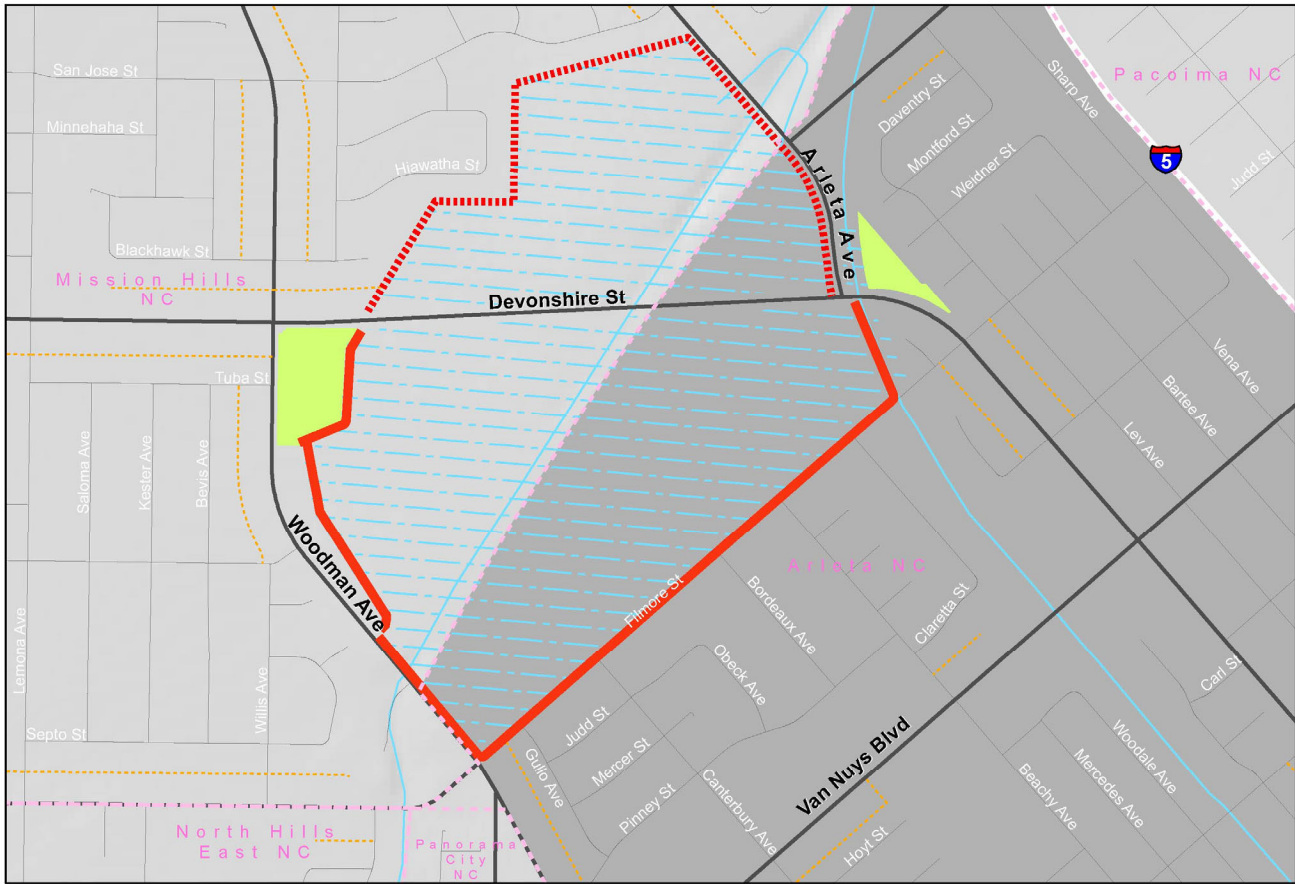
Breach at junction with City of Los Angeles Recreation & Parks' equipment storage area fence.  
Devonwood Park, 10230 Woodman Avenue, Mission Hills, CA 91345.



Breach at fence adjacent to 14400 San Jose Street, Mission Hills, CA 91345.



Pacoima Spreading Grounds: Arleta



3 cont.

**Jesus Ramos (JR1)**

**November 30, 2018**

- JR1-1      Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. Based on the community feedback, the LACFCD will be installing steel fencing along the entire public-facing perimeter (i.e., not facing private right-of-way) of the Pacoima Spreading Grounds, in addition to the perimeter segments discussed in the Recirculated MND. Because this comment does not address the environmental analysis in the Recirculated MND, no further response is required.
- JR1-2      Please refer to Response JR1-1, above. The proposed steel fence would extend along the perimeter of Filmore Street and Woodman Avenue in the subject area and is anticipated to be more durable and less prone to vandalism. Additionally, based on awareness of dumping within the basin, the LACFCD's maintenance crews will be routinely maintaining the Pacoima Spreading Grounds upon completion of the Project to minimize trash deposits in the basins. The land outside the perimeter fence is outside the LACFCD's jurisdiction; please direct complaints about unpermitted street food vending and/or dumping to the appropriate City of Los Angeles department and/or the County of Los Angeles Department of Public Health, as discussed in the comment.
- JR1-3      Please refer to Responses JR1-1 and JR1-2, above.

**From:** Robert A. Rouge  
**Sent:** Tuesday, November 27, 2018 11:44 PM  
**To:** DPW-SpreadingGrounds  
**Subject:** Request To Be Added For PSG AND TSG Projects

**RR**

---

Please add me to your list for any notifications about PSG and TSG projects.

1

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Sincerely,

Robert A. Rouge -

**Robert Rouge (RR)**

**November 27, 2018**

RR-1      Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged. You have been added to the mailing list for the Pacoima Spreading Grounds Improvement Project. Your request also indicates "TSG". It is assumed this refers to the Tujunga Spreading Grounds Enhancement Project; the LACFCD has placed you on this project's mailing list.

### **3.3 PUBLIC MEETING COMMENT CARDS**

- Yolonda Anguiano, Project Manager to East San Fernando Valley Nature Parkway, November 29, 2018.
- Raymond Duran, November 29, 2018.
- Araceli Hernandez, November 29, 2018.
- Jesse Ramos, November 29, 2018.
- Lokubanda Tillakaratne, November 29, 2018.
- Niranjala Tillakaratne, November 29, 2018.
- Justan Torres, November 29, 2018.



YA2

COMMENTS:

The tubular fence will not trap trash like The chain link fence did -  
to avoid trash from getting inside The Basin. Please consider Ironwork motif  
Instead of a tubular fence. An example ~~like~~ like that seen at The entrance  
of The LA River on Fletcher in Atwater. Valle Vida's efforts, The  
non-profit made to vitalize our sidewalks such as The Nature Parkway abutting  
The Pacoima Spreading Grounds - picks up trash through Community Beautification  
efforts. Thank you for recognizing The Nature Parkway as part of The current  
Basin's land use. Valle Vida wants to be your partner to bring health equity  
to our community by vitalizing The Pacoima Spreading Grounds as a landmark that  
recharges water & gets students to learn about its purpose & promotes healthy living.

1

2

3

Name: Yolie Anguiano

Address:

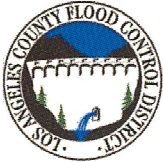
E-Mail:



**Yolanda Anguiano, Project Manager to East San Fernando Valley Nature Parkway (YA2)**

**November 29, 2018**

- YA2-1      Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged. Based on the community feedback, the LACFCD will be installing steel fencing along the entire public-facing perimeter (i.e., not facing private right-of-way) of the Pacoima Spreading Grounds, in addition to the perimeter segments discussed in the Recirculated MND. The specific style of the fence is being finalized, based on feedback and financial parameters. Additionally, based on awareness of dumping within the basin, the LACFCD's maintenance crews will be routinely maintaining the Pacoima Spreading Grounds upon completion of the Project to minimize trash deposits in the basins.
- YA2-2      This comment is acknowledged.
- YA2-3      This comment is acknowledged. A multi-benefit project may be considered in the future to include public recreation and additional aesthetic enhancements. The LACFCD is looking forward to working and partnering with the community on issues of concern and on future projects near the Pacoima Spreading Grounds facility that would bring value to the community.



RD2

COMMENTS:

Spreading ground security Fence needs Reinforcing around  
the perimeter. Homeless go over the Fence and other locals.  
Please send out maintenance workers out more often.  
trash builds up often Especially due to Large homeless  
population and vendors (Food.)

1

Name:

Raymond Duran

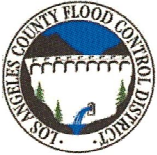
Address:

E-Mail:

**Raymond Duran (RD2)**

**November 29, 2018**

RD2-1      Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. Based on the community feedback, the LACFCD will be installing steel fencing along the entire public-facing perimeter (i.e., not facing private right-of-way) of the Pacoima Spreading Grounds, in addition to the perimeter segments discussed in the Recirculated MND. The proposed steel fence is anticipated to be more durable and less prone to vandalism. Additionally, based on awareness of dumping within the basin, the LACFCD's maintenance crews will be routinely maintaining the Pacoima Spreading Grounds upon completion of the Project to minimize trash deposits in the basins.



Pacoima Spreading Grounds Improvement Project  
Community Meeting- November 29, 2018  
6:00 PM

AH

COMMENTS:

I work as a rep for LA Nature for all of our water. LA & understand the IMPORTANCE of this project, but I also ~~understand~~ know this will be a HUGE missed opportunity to add more green open space, for future generations! I support plans to improve the Pacoima spread, but I highly **URGE** LAPW. to ~~also~~ think about <sup>the</sup> recreation opportunities that could be brought to a community that is identified as a PARK POOR community w/ a high need for more park space. You can help this low-income & disenfranchised community, by add ~~places to~~ more green spaces that will improve our overall health. →

1

Name: Araceli Hernandez

Address: \_\_\_\_\_

E-Mail: \_\_\_\_\_

AH

Don't cut this community short. Plans could easily  
be adjusted to add a running track

along the grounds, bird  
watching stations, &

Place  
Stamp  
Here

More native plants. I live ~~across~~ across the  
street & see all the owls, red tail hawks, turkey vultures,  
scrub jays, etc. You might not see it, but I see all the  
benefits the spread brings to me & my community. I think  
this is a space & opportunity to  
support this community. add

Los Angeles County  
Flood Control District  
900 South Fremont Avenue, 11<sup>th</sup> Floor  
Alhambra, California 91803

Attn: Pacoima Spreading Grounds Improvement Project

Bird watching stations, & more Native plants!  
I support & URETE for the expansion of the Nature  
Parkway  
- Araceli

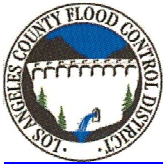
1 cont.

**Araceli Hernandez (AH)**

**November 29, 2018**

AH-1      Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged. A multi-benefit project may be considered in the future to include public recreation and additional aesthetic enhancements. the LACFCD is looking forward to working with the community on future projects near the Pacoima Spreading Grounds facility. There are two community parks adjoining the Pacoima Spreading Grounds facility, and a new bike path along Pacoima Diversion Channel would be constructed as part of the Project. Because this comment does not address the environmental analysis in the Recirculated MND, no further response is required.





COMMENTS:

Upgraded fence for the entire perimeter of the spreading grounds, particularly on Filmore St site at Woodman Av in Arleta side, should be installed due to homeless breaching the fence at the alley intersection and as the fence goes to the wash past Beachy Av.

1

Name: \_\_\_\_\_

Jesse Ramos

Address: \_\_\_\_\_

91334

E-Mail: \_\_\_\_\_

**Jesse Ramos (JR2)**

**November 29, 2018**

JR2-1      Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. Based on the community feedback, the LACFCD will be installing steel fencing along the entire public-facing perimeter (i.e., not facing private right-of-way) of the Pacoima Spreading Grounds, in addition to the perimeter segments discussed in the Recirculated MND, and it is anticipated to be more durable and less prone to vandalism. Because this comment does not address the environmental analysis in the Recirculated MND, no further response is required.



Dear DWP:

COMMENTS:

Thanks for the presentation. I have the following questions for your attention.

1

① The Proposed Sound wall: What arrangements are in place to curb and delete graffiti?

② What could be done to convert one of the Paddies (Pits) to a permanent pond so the residents can enjoy it.

2

③ We'd like to have the Bike Path lighted. Can this be done? Or can you refer this request to the appropriate authority in a

3

Name: Counb/City/ or DWP?

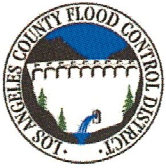
Address: Lokubande Tillakaratne, 10023 Noble Ave. Mt 91345

E-Mail:

**Lokubanda Tillakaratne (LT)**

**November 29, 2018**

- LT-1      Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. The comment is acknowledged. As indicated in Section 3.12, Noise, of the Recirculated MND, a sound wall would be installed along the shared property line of the headworks improvement area. Based on public feedback, the LACFCD has opted to also install the sound wall along the private-facing perimeter (i.e., where the spreading basins abut private land uses). It is noted that graffiti could potentially be an issue during both construction and post-construction. However, the Project site will be regularly monitored during construction and any graffiti incidents within the site will be addressed. Additionally, graffiti issues during and after construction of the Project can be reported to the County's Graffiti Abatement Hotline at 800-675-HELP (4357) or the following link: <http://dpw.lacounty.gov/itd/dispatch/publicgraffiti/index.cfm?action=report>.
- LT-2      Converting one of the basins to a permanent pond for public enjoyment is not under consideration for this Project. This is because a primary objective of the proposed Project is to increase the water conservation through additional recharge of captured storm water runoff into the underlying San Fernando Valley Groundwater Basin. Keeping the basins empty, after complete infiltration, would maximize this opportunity during storms. However, an alternate multi-benefit project with public recreation features may be considered in the future.
- LT-3      Installing night lighting along the proposed bike path is not under consideration for this Project. This is because these facilities are primarily used during daylight hours, and nearby residents on the opposite side of the Pacoima Diversion Channel may be adversely affected by the lights. As the east side of Filmore Street, across from the spreading grounds, is developed primarily with single-family homes, installing additional street lights would increase the level of nighttime lighting for the residents in the area. The Recirculated MND concludes there would be no increase in nighttime light and glare that would affect the surrounding uses.



NT

COMMENTS.

1 The presentation was not visible for the audience. Please  
post your Powerpoint presentations published / posted online  
so the public can read it before the meeting.

1

Name: \_\_\_\_\_

Address: \_\_\_\_\_

E-Mail: \_\_\_\_\_

Niranjale Tillakaratne

MISSION HILLS

CA 91345

Place  
Stamp  
Here

Los Angeles County  
Flood Control District  
900 South Fremont Avenue, 11<sup>th</sup> Floor  
Alhambra, California 91803

Attn: Pacoima Spreading Grounds Improvement Project



**Niranjala Tillakaratne (NT)**

**November 29, 2018**

NT-1      Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged. It was unfortunate, but unforeseen, that the PowerPoint presentation could not be expanded to fit the pull-down screen and as a result was not more visible to the audience. However, as per standard procedures, the presentation was placed on the County's website for the Project the following day (November 30, 2018).



**Pacoima Spreading Grounds Improvement Project  
Community Meeting- November 29, 2018  
6:00 PM**

JT

COMMENTS:

COMMENTS: I am a member of this community as well as a social worker and outdoor enthusiast. Having seen similar projects like this that also incorporate infrastructure for the public to recreate, I feel it would be a sorely missed opportunity not to incorporate that in this project. Some examples are Silver Lake or Lake Hollywood, presently we even have the community taking it upon themselves to attempt such a project called "Nature Parkway". The city's project should include similar projects and/or collaborate w/ the present community project.

1

Name: Justan Torres

Address: \_\_\_\_\_

E-Mail: \_\_\_\_\_

**Justan Torres (JT)**

**November 29, 2018**

JT-1      Thank you for submitting comments on the Recirculated MND; all comments will be provided to the Board of Supervisors for consideration prior to making a decision on Project approval. This comment is acknowledged. Additional public recreation features are not included in the proposed Project at this point and have not been evaluated in the Recirculated MND. A multi-benefit project may be considered in the future to include public recreation and additional aesthetic enhancements. The LACFCD is looking forward to working with the community on future projects near the Pacoima Spreading Grounds facility. Because this comment does not address the environmental analysis in the Recirculated MND, no further response is required.

## SECTION 4.0 CLARIFICATIONS

### 4.1 CLARIFICATIONS TO THE RECIRCULATED MND

The following text changes are made to the Pacoima Spreading Grounds Improvement Project Recirculated MND, dated November 2018, based on comments received during the public review period. There are no clarifications associated with the response to comments submitted on the 2016 MND. Changes to the text are noted with underline (for added text) or ~~strikeout~~ type (for deleted text).

Section 15073.5 of the State CEQA Guidelines describes the triggers for recirculation of an MND prior to its adoption. Specifically, Section 15073.5(a) states “A lead agency is required to recirculate a negative declaration when the document must be substantially revised after public notice of its availability has previously been given...but prior to its adoption”. Section 15073.5(b) defines a substantial revision as:

- (1) A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or
- (2) The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.

The clarifications to the Recirculated MND provided in Section 4.1 below are solely text edits that further substantiate conclusions and/or clarify aspects of the previously circulated document. These clarifications do not change the description of the proposed Pacoima Spreading Grounds Improvement Project nor the meaning, intent, or results of the Recirculated MND. None of these changes reflect a determination of a new or more significant environmental impact than disclosed in the Recirculated MND, nor reflect a substantial revision to the Recirculated MND. Accordingly, none of these clarifications represent a substantial revision pursuant to Section 15073.5 of the State CEQA Guidelines and no recirculation of the Recirculated MND, dated November 2018, is required due to incorporation of the following clarifications.

#### **Page 1-3 in Section 1.0, Introduction**

RRs are based on local, State, and/or federal regulations or laws and County policies that are required independent of CEQA review, yet also serve to offset or prevent certain impacts. The RRs identified in the Recirculated MND are those that act to reduce or avoid what would otherwise be a potentially significant environmental impact; not all applicable laws, regulations, or policies are identified as RRs.

#### **Page 3-13 in Section 3.3, Air Quality**

**RR AQ-1** All construction activities shall be conducted in compliance with all applicable South Coast Air Quality Management District (SCAQMD) rules and permitting requirements, including but not limited to:

- SCAQMD Rule 402, Nuisance, which states that a Project shall not “discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a

natural tendency to cause, injury or damage to business or property". Rule 402 refers to air contaminants or other material being discharged into the air, but not generation of noise and vibration.

- SCAQMD Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance. Compliance with this rule will reduce short-term particulate pollutant emissions. Contractor compliance with Rule 403 requirements shall be mandated in the contractor's specifications. This would include, but not be limited to:
  - Preparing and implementing a Fugitive Dust Control Plan.
  - Signage would be installed around the Project site that provides an appropriate contact person(s) and phone number(s) to call with dust-related complaints and the phone number of the SCAQMD compliance office. The signage would remain and be maintained for the length of the Project.
  - Watering exposed surfaces at least three times per day, or more during windy conditions. High wind conditions are defined under Rule 403 as instantaneous wind speeds that exceed 25 miles per hour.
  - Fugitive dust would be controlled during after-hours through the implementation of Best Available Control Measures (BACM) identified in SCAQMD Rule 403 and the Fugitive Dust Control Plan. Non-toxic soil stabilizers/dust suppressants, resistant to wind erosion, that create a crust on the surface may be selected and applied consistent with Rule 403.
  - Traffic speeds on unpaved roads would be restricted to no more than 15 miles per hour.
  - One or more devices would be installed at ingress/egress points to remove dirt from vehicle tires and undercarriage prior to leaving the site.
  - All materials to be loaded for export would be pre-watered.
  - All haul trucks would ~~either be covered (with on board tarp) or maintain at least two feet of freeboard between the top of the soil and the edge of the truck bed.~~

### **Page 3-29 in Section 3.4, Biological Resources**

**RR BIO-1** Consistent with the LACFCD Interim Tree Removal and Replacement Policy (effective August 2016 and currently remaining in effect), which is a local policy, all trees removed within the County's right-of-way, including but not limited to parkways, public rights-of-way, flood control facilities, and public buildings, would be replaced at a 1:1 ratio (i.e., one removed, one replaced) or higher. Replacement would be in a location near the existing location, unless this is not feasible, in which case the replacement tree can be planted in an alternate location within the Pacoima Spreading Grounds site.

### **Page 3-33 in Section 3.4, Biological Resources**

**MM BIO-1** The Project shall be conducted in compliance with the conditions set forth in the Migratory Bird Treaty Act (MBTA) and *California Fish and Game Code* with methods approved by the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) to protect active bird/raptor nests. As the

Project requires that work be initiated during the breeding season for nesting birds (March 1–September 15) and nesting raptors (January 1–July 31), a pre-construction survey for nesting birds and/or raptors shall be conducted by a qualified Biologist within 3 days prior to any construction activities on the Project site and in the immediately surrounding area (i.e., within ~~300~~50 feet for nesting birds and within 500 feet for nesting raptors). If the Biologist does not find any active nests in or immediately adjacent to the Project site, the construction work shall be allowed to proceed and no further mitigation is required.

If the Biologist finds an active nest in or immediately adjacent to the Project site and determines that the nest may be impacted or breeding activities substantially disrupted due to planned construction activities, the Biologist shall delineate an appropriate buffer zone around the nest depending on the sensitivity of the species and the nature of the construction activity. Any nest found during survey efforts shall be mapped on the construction plans. The active nest shall be protected until nesting activity has ended. To protect any nest site, the following restrictions to construction activities shall be required until nests are no longer active, as determined by a qualified Biologist: (1) construction limits shall be established within a buffer around any occupied nest (the buffer shall be ~~300~~25–400 feet for nesting birds and ~~300~~–500 feet for nesting raptors), unless otherwise determined by a qualified Biologist and (2) access and surveying shall be restricted within the buffer of any occupied nest, unless otherwise determined by a qualified Biologist. A qualified Biologist may determine a reduced buffer is appropriate due to existing screening or limited extent and or duration of an impact such that nesting birds are not expected to be negatively impacted. Encroachment into the buffer area around a known nest shall only be allowed if the Biologist determines that the proposed activity would not disturb the nest occupants. Construction in a buffer area can proceed when the qualified Biologist has determined that fledglings have left the nest or the nest has failed.

### **Page 3-83 in Section 3.16, Transportation/Traffic**

**RR TRA-1** ~~The County of Los Angeles Department of Public Works~~ Los Angeles County Flood Control District requires the implementation of temporary traffic control measures in accordance with the *Standard Specifications for Public Works Construction* (Greenbook), which contains standards for traffic and access (i.e., maintenance of access, traffic control, and notification of emergency personnel). For construction activity within the street right-of-way, a traffic control plan would be prepared in accordance with the *Work Area Traffic Control Handbook* (WATCH Manual) and subject to approval prior to initiation of the right-of-way activities by the City of Los Angeles Department of Transportation.

### **4.2 REVIEW OF 2019 CEQA ENVIRONMENTAL CHECKLIST**

Appendix G, Environmental Checklist Form, of the State CEQA Guidelines provides the topics and thresholds that were used in the Recirculated MND. Effective January 1, 2019, the Governor's Office of Planning and Research (OPR) published a revised environmental checklist. As the Recirculated MND is dated November 2018, the current checklist was not used as the basis of the environmental analysis in that document and is therefore not applicable pursuant to Section 15007 of the State CEQA Guidelines, which states that amendments to the Guidelines apply prospectively only. However, in the interests of completeness and transparency, this discussion provides an overview of the checklist revisions and their relevance to the findings of the Recirculated MND.



For the following environmental topics, OPR made no revisions to the Appendix G questions:

- Agriculture and Forestry Resources,
- Greenhouse Gas Emissions,
- Mineral Resources,
- Public Services,
- Recreation, and
- Tribal Cultural Resources.

For the following environmental topics, editorial changes were made to the Appendix G questions. This includes changes such as deleting a portion of a question because of irrelevance or confusion, combining questions within the same topic or moving questions to another topic, and clarifying edits. These topics include:

- Aesthetics,
- Air Quality,
- Biological Resources,
- Cultural Resources,
- Hazards and Hazardous Materials,
- Hydrology and Water Quality,
- Land Use and Planning,
- Noise,
- Population and Housing,
- Transportation,
- Utilities and Service Systems, and
- Mandatory Findings of Significance.

In addition, the revised Appendix G checklist includes two new topics: energy and wildfire.

Previously, wildfire was addressed solely in the hazards and hazardous materials topic. The expanded questions in the new wildfire topic pertain only to sites located in or near State responsibility areas or lands classified as very high fire hazard severity zones and focus on emergency response and exacerbation of wildfire risk. The Project site is not a State responsibility area or within a very high fire hazard severity zone; therefore, the new questions in the new wildfire topic would not be applicable regardless.

Previously, energy was addressed in Environmental Impact Reports pursuant to Appendix F, Energy Conservation, of the State CEQA Guidelines, generally as part of assessment of irreversible environmental changes pursuant to Section 15126.2(d) of the State CEQA Guidelines. The questions for the new energy topic reiterate the text in Appendix F related to wasteful, inefficient, or unnecessary consumption of energy and plans for renewable energy and energy efficiency. The proposed Project's use of energy would be almost entirely during the construction period and consists largely of gasoline and diesel fuel for operation of the off-road equipment and the haul trucks. This energy use would be finite and not considered wasteful or inefficient because the number and types of equipment in use at any given time would meet the needs of Project implementation at that time. The energy use is considered necessary to help the future potable water needs of the region and reduce dependence on imported water. Long-term energy use would be essentially the same as the existing condition, as long-term operations would be the

same. As such, consideration of this new topic in the environmental checklist does not indicate a new impact would result.

In summary, this narrative serves to both acknowledge the revised environmental checklist that became effective in January 2019 and to demonstrate the changes to the environmental checklist would not require more robust or additional analysis. There would be no new or more severe impacts when considering this checklist. Consistent with Section 15073.5 of the State CEQA Guidelines, discussed further above, no recirculation of the Recirculated MND is required.

#### **4.3 REVIEW OF REDESIGNED INTAKE CANAL**

##### **Proposed Intake Canal Design**

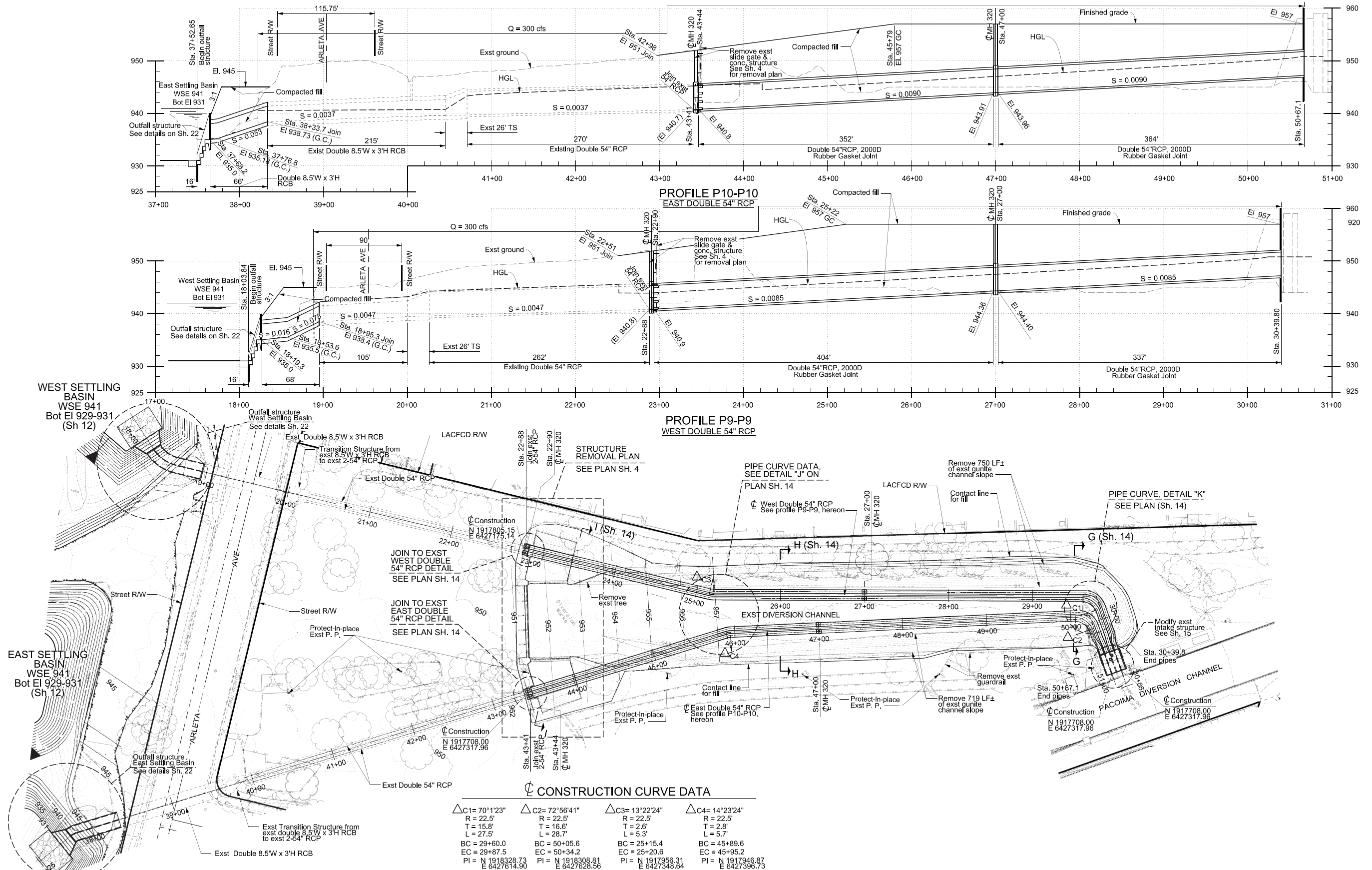
As described in pages 2-3 and 2-4 of the Recirculated MND, “The existing open, earthen-bottom and concrete-sided intake canal would be demolished and replaced with four (two pairs) 54-inch-diameter reinforced concrete pipes (RCPs) that would connect to the four existing 54-inch-diameter RCPs and then the existing 8.5-foot-wide and 3-foot-tall reinforced concrete boxes (RCBs) that cross beneath Arleta Avenue and outfall in the spreading basins (see Exhibit 2-4)[of the Recirculated MND]. The new pipelines were to be backfilled with approximately 28,000 cubic yards (cy) of the 1.6 million cy of sediment excavated from the spreading basins. The backfill would go up to the existing ground level in the headworks area. The ground surface would remain earthen.”

Subsequent to circulation of the Recirculated MND, LACFCD determined that the intake canal design addressed in the Recirculated MND would need some modifications to ensure appropriate long-term maintenance and operation. Principally, it was determined that complete coverage of the intake canal would pose a substantial maintenance challenge to access the subterranean infrastructure and remove the large quantities of sediment, trash, and other debris that enter the intake canal in runoff and would accumulate over time. After further consideration of engineering and operational constraints, it was concluded that a partially open intake canal would be a preferable option as it would provide the following benefits:

- Ease of maintenance, including debris removal;
- Improved percolation rate;
- Reliable flow measurement; and
- Operational flexibility.

As a result, the design was modified to a partially open intake canal. The intake canal design addressed in the Recirculated MND (as Exhibit 2-5) is provided here as Exhibit 4-1, 2018 Recirculated MND Intake Canal Design, and the proposed intake canal redesign is provided here as Exhibit 4-2, 2020 Intake Canal Redesign. On Exhibit 4-2, the areas that are different in the 2020 design compared to the 2018 design are shaded in light yellow.

As shown, a new headworks would be installed approximately 260 feet upstream from the existing headworks (where the existing canal ends and the pipes extend underground). The existing canal between the old and new headworks would be demolished and replaced with four, 54-inch-diameter RCPs. This is the same concept as proposed in the Recirculated MND, but the RCPs would be in a slightly different alignment. The area between the old and new headworks would be backfilled with sediment and have an earthen surface, same as proposed in the Recirculated MND. The existing canal from the new headworks upstream to near its connection with the Pacoima Diversion Channel would be demolished and replaced with a rectangular concrete-lined



Source: Los Angeles County Flood Control District 2015

## 2018 Recirculated MND Intake Canal Design

Pacoima Spreading Grounds Improvement Project

Exhibit 4-1







channel with an access ramp on the east side to allow vehicular access for maintenance and operation of the facility. A section of overflow line comprised of two, 36-inch-diameter RCPs would be constructed from the east face of the canal upstream of the new headworks towards the southeast and would later be extended to connect to Pacoima Diversion Channel. The overflow line would serve as a preventative measure to avoid potential surface flooding during high stormwater flow operation, which were previously addressed by making the intake canal fully subterranean. The proposed intake canal redesign addresses operational needs and further enhances the water conservation capabilities of the spreading grounds.

### ***Changes in Construction Scenario***

The LACFCD calculated the volumes of sediment movement and demolition debris for the Project based on the proposed intake canal redesign. The Recirculated MND analyzed the environmental impacts of exporting 1,370,000 (1.37 million) cubic yards (mcy) of sediment over 20 months, resulting in a total of either 372 18-cy or 478 14-cy daily truck trip ends, plus 18 daily employee trips. This is equivalent to 425 average (i.e., 16 cy) daily truck trip ends plus employee trips. The Recirculated MND also analyzed the export of 614 cy of demolition debris, generating a total of approximately 77 haul truck trips to Sunshine Canyon Landfill that would all occur in one day.

The intake canal redesign would result in the export of an estimated 1,377,977 cy of sediment, or approximately 7,977 cy more than analyzed in the Recirculated MND. This is largely due to the reduced amount of backfill needed because a portion of the intake canal would remain open. The export of 7,977 cy would generate a total (i.e., not daily) of approximately 443 18-cy truck trips or approximately 570 14-cy truck trips. Because a mix of 18-cy and 14-cy trucks would be used in reality, for purposes of this discussion it is assumed that export of the additional 7,977 cy of sediment would generate approximately 498.56 (499) additional average (16 cy) total truck trips. Based on a five-day work week, there are a total of 435 workdays in the 20-month construction period. A total of 499 truck trips over 435 days equates to slightly more than one (1.15) additional truck trip per day to one of the sediment disposal locations. All other aspects of the Project's construction would be the same as described in the Recirculated MND and this Response to Comments and Clarifications document. Operation and maintenance of the Project would also be the same, and the redesign of the intake canal avoids more frequent and intense maintenance activity to keep the RCPs free of accumulated debris than was anticipated in the Recirculated MND.

### **CEQA Process**

Section 15073.5 of the State CEQA Guidelines describes the following circumstances that necessitate recirculation of an MND:

- (a) A lead agency is required to recirculate a negative declaration when the document must be substantially revised after public notice of its availability has previously been given pursuant to Section 15072, but prior to its adoption. Notice of recirculation shall comply with Sections 15072 and 15073.
- (b) A "substantial revision" of the negative declaration shall mean:
  - (1) A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or

- (2) The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.
- (c) Recirculation is not required under the following circumstances:
  - (1) Mitigation measures are replaced with equal or more effective measures pursuant to Section 15074.1 [of the State CEQA Guidelines].
  - (2) New project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration which are not new avoidable significant effects.
  - (3) Measures or conditions of project approval are added after circulation of the negative declaration which are not required by CEQA, which do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect.
  - (4) New information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

An increase of slightly more than one truck trip a day is a negligible increase, in terms of noise, air pollutant emissions, and traffic. As demonstrated by the topical analyses presented below, this change in construction scenario is not a "substantial revision" as defined under Section 15073.5(b) of the State CEQA Guidelines. There would be no change in the significance of any identified environmental impacts, nor would new mitigation measures or other revisions to the Project be required. Therefore, recirculation of the Recirculated MND is not necessary, and no further documentation is required under CEQA. Nonetheless, this description of the intake canal redesign and associated analyses is provided by the LACFCD in the interest of transparency and full disclosure.

### **Analysis of Proposed Intake Canal**

Construction and operation of the redesigned intake canal would have no effect on the analysis of agricultural resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use and planning, mineral resources, population and housing, public services, recreation, or tribal cultural resources. Construction of the intake canal would involve the same equipment, and number of employees and staff. Implementation of the Project with the redesigned intake canal would require compliance with any and all the regulatory requirements (RRs) and implementation of all mitigation measures (MMs) identified for these topics in the Recirculated MND and the Mitigation Monitoring and Reporting Program (MMRP).

Regarding aesthetics, the view of the headworks area when construction is complete would be different due to the retention of a partially open intake canal, with approximately half the current canal area having an earthen surface. However, the view of the open portion of the intake canal under the proposed redesign would be similar to the existing condition. Therefore, consistent with the findings of the Recirculated MND, there would be a less than significant impact related to visual character. There would be no changes to the analysis of scenic vistas, scenic highways, or light and glare.

Regarding air quality and greenhouse gas (GHG) emissions, the incremental emissions from the addition of just over one truck trip per workday would not increase the estimated short-term (construction) generation of regional or local criteria air pollutants, toxic air contaminants (TACs)



such as diesel particulates, or GHG emissions disclosed in the Recirculated MND. This would include emissions of nitrous oxides (NO<sub>x</sub>) and respirable particulate matter with a diameter of 10 microns or less (PM<sub>10</sub>), both of which required mitigation to reduce to a less than significant level. These emissions estimates presented in the Recirculated MND were based on conservative, worst-case scenario assumptions, and as such the actual daily emissions would generally be lower. Also, the proportion of emissions from a single haul truck among an average of 425 haul truck round trips a day, 18 employee trips a day, and on-site construction equipment is inconsequential. Finally, based on public feedback, the LACFCD has determined to voluntarily include air monitoring for PM<sub>10</sub>; the requirements for this monitoring will be included in the Contractor specifications. Therefore, consistent with the findings of the Recirculated MND, there would be a less than significant impact with compliance with RR AQ-1 and implementation of MMs AQ-1 and AQ-2 related to daily construction emissions, daily local emissions at sensitive receptors, conflict with the 2016 Air Quality Management Plan (AQMP), and cumulative air quality impacts. There would be no change to the analysis of odors.

Regarding hydrology and water quality, as discussed above, the overflow line would serve as a preventative measure to avoid potential surface flooding during high stormwater flow operation. A section of overflow line would be constructed as part of the Project and would later be extended to connect to Pacoima Diversion Channel. This connection would not be made as part of the Project due to additional regulatory permitting that is required for this action that would substantially delay the schedule if pursued now. Based on the intake canal redesign, the LACFCD anticipates that the possibility of surface flooding is remote. Therefore, this is not considered a new significant impact related to flooding. There would be no changes to the analysis of water quality, groundwater supplies, drainage pattern and stormwater drainage systems, 100-year flood hazard area, or inundation.

Regarding noise, the incremental noise generated from the addition of just over one truck trip per workday would not be audible when combined with either other construction activity on the Project site or with traffic on public roadways. Due to the logarithmic nature of the decibel unit, a doubling of a noise source would result in a 3 dBA increase in the noise level, which is considered barely perceptible to human hearing. An increase of one truck is far less than a doubling of the anticipated 425 average daily haul truck trips. Similarly, the difference in noise levels for construction of the rectangular channel versus fully backfilling the canal would be negligible. Therefore, consistent with the findings of the Recirculated MND, there would be a less than significant impact with compliance with RR NOI-1 and implementation of MM NOI-1 related to on-site construction equipment noise or off-site vehicular noise. There would be no changes to the analysis of vibration, permanent (operational) noise levels, or air traffic noise levels.

Regarding transportation and traffic, the addition of just over one truck trip per workday would not make a noticeable change in traffic levels along the routes to any of the sediment disposal locations. Therefore, consistent with the findings of the Recirculated MND, there would be a less than significant impact with compliance with RR TRA-1 and implementation of MMs TRA-1 and TRA-2 related to trip generation associated with export and disposal of 1,377,977 cy of sediment at the Vulcan Materials-owned sediment disposal sites and Sunshine Canyon Landfill. There would be no changes to the analysis of conflict with the *2010 Los Angeles County Congestion Management Program*, air traffic patterns, traffic hazards or incompatible uses, emergency access, or alternative transportation policies.

Regarding utilities and service systems, the off-site disposal of an additional 7,977 cy of sediment to the Vulcan Materials-owned sites, which can accept up to 2,800 tons per day (tpd) or 56 percent of the daily export, or Sunshine Canyon Landfill, which can accept 2,200 tpd or 44 percent of the daily export, would not exceed the permitted capacity of any proposed disposal location. As discussed on pages 3-130 and 3-131 of the Recirculated MND, accommodating 44 percent of

1.37 mcy of sediment would represent approximately 0.7 percent of Sunshine Canyon Landfill's remaining permitted capacity. Also, sediment disposed at Sunshine Canyon would be used as daily cover and other on-site beneficial uses that do not directly contribute to a reduction in landfill space. As such, disposing of an additional 7,977 cy of sediment would have negligible effect on the remaining space available at Sunshine Canyon Landfill. The sediment exported to Vulcan Materials-owned sites would be processed for eventual reuse as construction aggregate. Therefore, consistent with the findings of the Recirculated MND, there would be a less than significant impact with compliance with RR UTL-1 related to landfill space and solid waste regulations. There would be no changes in the analysis of wastewater conveyance and treatment, water supplies, or storm water drainage infrastructure.

As stated above, the change in construction scenario to implement the intake canal redesign is not a "substantial revision" as defined under Section 15073.5(b) of the State CEQA Guidelines. There would be no change in the significance of any identified environmental impacts, nor would new mitigation measures or other revisions to the Project be required. Therefore, recirculation of the Recirculated MND is not necessary and no further documentation is required under CEQA.

#### **4.4 REVIEW OF EXTENDED CONSTRUCTION PERIOD**

##### **Change to Construction Period**

The LACFCD has determined that the anticipated construction period will be extended from approximately 20 months up to a maximum of 36 months. This change to the construction period is primarily as a result of limitations on the daily tonnage and/or hours allowed for sediment disposal at both the Vulcan Materials-owned site and Sunshine Canyon Landfill. During final negotiation of the disposal agreements and subsequent to circulation of the Recirculated MND, LACFCD became aware of certain restrictions at each disposal facility that had not been previously known. These limitations affect how much sediment can be exported each workday, thereby extending the construction period to remove the same total amount of excavated material.

The analysis in the Recirculated MND was based on the following Project parameters that would be changed based on the new limitations in place at the disposal facilities:

- Continuous export within the 8-hour workday within the hours of 9:00 AM to 5:30 PM, Monday–Friday;
- 2,200 tpd of disposal at Sunshine Canyon Landfill five days a week and 2,800 tpd of disposal at Vulcan facilities five days a week, or 5,000 tpd of sediment export; and
- 372 and 478 total daily truck trips ends, for 18-cy and 14-cy trucks, respectively.

During negotiations with the two facilities, the following restrictions on sediment export from Pacoima Spreading Grounds were defined:

- Sunshine Canyon Landfill will accept exports until 5:00 PM and Vulcan will accept exports until 4:30 PM, a reduction of 30 minutes to 1 hour each workday of hauling operations.
- Sunshine Canyon Landfill will accept 6,600 tons of sediment per week, a reduction of 40 percent of the weekly disposal volume at this location.
- Vulcan recommends use of smaller trucks due to safety and circulation issues within and near their facilities; meeting this recommendation eliminates use of 18-cy haul trucks.

The Cal-Mat pit is the sole Vulcan-owned facility that will commit to accepting the sediment from Pacoima Spreading Grounds; this was addressed as Alternative 4 in the Recirculated MND. Also being considered in this scenario is the approximately 7,977 cy more sediment to be exported due to the intake canal redesign, which is addressed above in Section 4.3.

In addition to the above-listed factors, the LACFCD has determined that Super 10 dump trucks best meet the needs of the Project, including, but not limited to: (1) specifying a truck model that the contractor would be able to reserve an adequate quantity to serve the Project; (2) that are certified as having 2013 or newer emissions levels, (3) meeting the air quality modeling parameters in terms of gross weight per loaded truck, and (4) being a truck type that is preferred at the Vulcan facilities. A single Super 10 truck holds an estimated 10 cy, or 15 tons, of sediment. Table 4-1 summarizes the worst-case daily trip generation and disposal volume for the Project to meet all requirements and limitations for sediment export.

**TABLE 4-1  
MAXIMUM OUTBOUND TRIP GENERATION AND DISPOSAL VOLUME**

	Vulcan Facility (CalMat)		Sunshine Canyon Landfill	Totals
	Haul Route A	Haul Route B	Haul Route C	
Daily Outbound Total Trip Ends	77	61	100	238
Daily Total Tons Exported	2,070		1,500 <sup>1</sup>	3,570
<sup>1</sup> 6,600 tons per week disposal limit at Sunshine Canyon Landfill; therefore, this volume will not be exported five days a week				

When considering all of the above parameters as well as the hourly truck trip limits on each of the three haul routes (Haul Routes A, B, and C) to ensure there are no significant transportation impacts, the LACFCD determined that a maximum of 3,570 tpd of sediment could be exported in a workday and would result in a maximum of 238 outbound truck trips or a total of 476 trip ends (or 238 inbound and 238 outbound trips to the disposal facility and back), including 276 trip ends to and from the Cal-Mat pit and 200 trip ends to and from Sunshine Canyon Landfill.

As discussed in the Recirculated MND, using an assumption of solely 14-cy capacity trucks, the proposed Project was estimated to generate a total of 478 daily truck trip ends during a typical weekday, including 268 trip ends to the Vulcan pits and 210 trip ends to Sunshine Canyon Landfill. Therefore, the maximum haul truck trips under this scenario would be slightly below the daily trips calculated with use of solely 14-cy haul trucks. For Sunshine Canyon Landfill disposal, it is noted that 200 trip ends between 9:00 AM and 5:00 PM is a maximum in a single workday and is addressed herein as the worst-case scenario; however, if this was exported five days a week the volume of material would exceed the weekly limit set by the disposal facility. Therefore, some days will have fewer outbound trips to Sunshine Canyon than the maximum determined based on the transportation analysis.

An estimated 1,377,977 cy of sediment equates to an estimated 2,066,966 tons.<sup>1</sup> Assuming an average of 3,390 tons of sediment are exported each working day—which reflects the 6,600 tons per week limit at Sunshine Canyon Landfill—there would be approximately 610 hauling days or approximately 30.4 months.<sup>2</sup>

In addition to hauling days, the LACFCD plans to have an estimated 30 working days at both the beginning and end of the Project for mobilization and demobilization, respectively. This would include activities such as installation and removal of construction trailers, installation and removal of sound walls and signage, and paving the central levee. The mobilization/demobilization periods

<sup>1</sup> Cubic yards X 1.5 = Tons

<sup>2</sup> 407 days / 20.0588 working days per month = 20.3 months

are planned to help ensure that the period of hauling activities is abbreviated as much as feasible by having the site in readiness on the first hauling day and leaving the site cleanup until after all hauling is complete. While these activities would not contribute to new or more significant impacts than those addressed in the Recirculated MND because they would be much less intense than the hauling and construction activities to implement the Pacoima SG improvements, they would extend the number of total working days on the Project site. When including 60 working days to the hauling days, there would be a total of 670 working days, or approximately 33.4 months of work being done on the site.

As with all construction projects, it is anticipated that non-working days Monday through Friday due to inclement weather, high wind events, and/or holidays would occur and extend the total construction period. Although the number of non-working days cannot be precisely known in advance, with the inclusion of these days it is estimated that the total construction period could be up to 36 months.

It is noted that during the final negotiations with the disposal facilities, LACFCD learned that there may be potential opportunities to coordinate with the disposal facilities to increase the rate of sediment export by accepting additional material or extending their operational hours during certain months of the year. However, these would be case-by-case exceptions to the disposal limits committed to by these facilities. LACFCD would authorize the changes to the daily hauling schedule and/or tonnage, if requested by the Contractor and in concurrence with the applicable disposal facility. If these occasional changes in the hauling limits occurred, neither the total number of hourly and daily haul truck trips nor the working hours addressed in the Recirculated MND would be exceeded. For purposes of this analysis, the same types and numbers of off-road construction equipment is assumed. Therefore, for purposes of a worst-case analysis (i.e., longest potential period) of an extended construction schedule, a period of 36 months is analyzed below.

### **CEQA Process**

Section 15073.5 of the State CEQA Guidelines describes the following circumstances that necessitate recirculation of an MND prior to adoption:

- (a) A lead agency is required to recirculate a negative declaration when the document must be substantially revised after public notice of its availability has previously been given pursuant to Section 15072, but prior to its adoption. Notice of recirculation shall comply with Sections 15072 and 15073.
- (b) A “substantial revision” of the negative declaration shall mean:
  - (1) A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or
  - (2) The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.
- (c) Recirculation is not required under the following circumstances:
  - (5) Mitigation measures are replaced with equal or more effective measures pursuant to Section 15074.1 [of the State CEQA Guidelines].

- (6) New project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration which are not new avoidable significant effects.
- (7) Measures or conditions of project approval are added after circulation of the negative declaration which are not required by CEQA, which do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect.
- (8) New information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

As demonstrated by the topical analyses presented below, this change in construction scenario is not a "substantial revision" as defined under Section 15073.5(b) of the State CEQA Guidelines. There would be no change in the significance of any identified environmental impacts, nor would new mitigation measures or other revisions to the Project be required. Therefore, recirculation of the Recirculated MND is not necessary, and no further documentation is required under CEQA. Nonetheless, the description of the extended construction period and associated analyses is provided by the LACFCD in the interest of transparency and full disclosure.

### **Analysis of Extended Construction Period**

The extension of the construction schedule would have no effect on the analysis of aesthetics, agricultural resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use and planning, mineral resources, population and housing, public services, recreation, and tribal cultural resources. This is because the Project would have the same design and occur in the same geographic area (except for the intake canal) and would have the same construction activities and equipment. Also, implementation of the Project with an extended construction schedule would continue to require compliance with all of the regulatory requirements (RRs) and would include implementation of all mitigation measures (MMs) identified for these environmental topics as well as all voluntary measures that the LACFCD will be including in the Contractor specifications for the Project that were included in the Recirculated MND and/or are discussed in the response to comments (Sections 2.0 and 3.0 of this document).

Regarding air quality emissions, modeling demonstrates there would be no new or more significant impacts related to regional or local emissions or criteria air pollutants, or cancer risk as calculated in the Health Risk Analysis (HRA). It is noted that although there is expected to be approximately 20.3 months of hauling days, the air quality modeling is based on 36 months of hauling days to provide a more conservative approach in determining whether the extended construction schedule would be more impactful. Similarly, the air quality modeling assumed the maximum daily haul truck trips of 476 trip ends would occur five days a week, although there would be fewer trip ends of some days each week to ensure the weekly limit at Sunshine Canyon Landfill is not exceeded. The results of the air quality modeling reflecting the extended construction period is below.

Table 4-2, Estimated Maximum Daily Construction Emissions with Mitigation (lbs/day), illustrates that with implementation of MM AQ-1 as presented in the Recirculated MND, there would be no new or more significant impact than disclosed in the Recirculated MND. The regional construction emissions presented in the Recirculated MND are presented in Table 4-6 in Section 4.5 below.

**TABLE 4-2  
ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS  
WITH MITIGATION (LBS/DAY)**

	VOC	NOx	CO	SOx	PM10	PM2.5
On-Site Equipment	0.76	3.84	29.70	0.06	4.95	2.75
Worker Trips	0.09	0.06	0.73	0.00	0.20	0.05
Demolition Haul Trucks	0.00	0.02	0.00	0.00	0.12	0.01
Super 10 Haul Trucks <sup>1</sup>	1.94	72.78	15.72	0.16	32.12	6.21
<b>Total Emissions*</b>	<b>2.79</b>	<b>76.70</b>	<b>46.15</b>	<b>0.21</b>	<b>37.39</b>	<b>9.02</b>
<i>SCAQMD Thresholds</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
lbs/day: pounds per day; VOC: volatile organic compound(s); NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; cy: cubic yards; SCAQMD: South Coast Air Quality Management District. <sup>1</sup> Based on Super 10 Trucks, which is classified as a Heavy-Heavy Duty (T7) vehicle for modeling purposes Source: Vista Environmental 2021.						

Table 4-3, Local Fugitive Dust Concentrations with and without Mitigation, illustrates that with implementation of MM AQ-1 and MM AQ-2 as presented in the Recirculated MND, there would be no new significant impacts and no new or more significant impacts than disclosed in the Recirculated MND. The local PM10 construction emissions presented in the Recirculated MND are presented in Table 4-8 in Section 4.5 below.



**TABLE 4-3  
LOCAL FUGITIVE DUST CONCENTRATIONS WITH AND WITHOUT  
MITIGATION WITH 2021 CONSTRUCTION START DATE**

Receptor ID	Receptor Description	Receptor Location <sup>a</sup>		24-Hour PM10 Concentrations (µg/m <sup>3</sup> )	
		X	Y	Unmitigated	Mitigated (MMs AQ-1 and AQ-2)
1	SFR – NW of Intake Structure	367,030	3,792,240	5.69	4.29
2	SFR – N of Spreading Grounds	366,644	3,792,082	9.25	6.98
3	SFR – NW of Spreading Grounds	366,494	3,791,913	9.14	6.90
4	SFR – W of Spreading Grounds	366,294	3,791,729	9.87	7.44
5	Devonwood Park – W of Spreading Grounds	366,214	3,791,536	9.93	7.49
6	SFR – SW of Spreading Grounds	366,272	3,791,136	8.56	6.46
7	SFR – SE of Spreading Grounds	366,526	3,790,962	7.36	5.55
8	SFR – E of Spreading Grounds	367,107	3,791,450	10.28	7.76
9	SFR – E of Spreading Grounds	367,095	3,791,634	9.28	7.00
10	SFR – SE of Paxton St	367,081	3,791,995	6.32	4.77
11	MFR – SE of Paxton St	367,267	3,792,154	3.86	2.92
12	SFR – S of Devonshire Street	366,025	3,791,611	5.34	4.03
Threshold of Significance <sup>b</sup>				10.4	10.4
Exceeds Threshold?				No	No
<p>µg/m<sup>3</sup>: micrograms per cubic meter; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; SFR: single-family residential; MFR: multi-family residential; NW: northwest; N: north; W: west; SW: southwest; SE: southeast; E: east.</p> <p><sup>a</sup> Based on World Geodetic System 1984 (WGS84), Universal Transverse Mercator (UTM). The UTM projection uses two-dimensional (i.e., Cartesian) coordinate system to give locations on the surface of the Earth. The “X” and “Y” represent the two points on the earth that, together, represent the location of each receptor under the UTM system.</p> <p><sup>b</sup> SCAQMD Thresholds of Significance (taken from <a href="http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2">http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2</a>).</p> <p>Source: Vista Environmental 2021.</p>					

Table 4-4, Diesel PM10 Levels and Cancer Risk with Mitigation, illustrates that with implementation of MM AQ-1 as presented in the Recirculated MND, there would be no new or more significant impact than disclosed in the Recirculated MND. The cancer risk analysis presented in the Recirculated MND are presented in Table 4-10 in Section 4.5 below.

**TABLE 4-4  
DIESEL PM10 LEVELS AND CANCER RISK WITH MITIGATION**

Receptor ID	Receptor Description	Receptor Location*		Annual PM10 Concentration (µg/m³)	Cancer Risk Per Million People
		X	Y		
1	SFR – NW of Intake Structure	367,030	3,792,240	0.0142	3.1
2	SFR – N of Spreading Grounds	366,644	3,792,082	0.0088	1.4
3	SFR – NW of Spreading Grounds	366,494	3,791,913	0.0068	1.0
4	SFR – W of Spreading Grounds	366,294	3,791,729	0.0142	2.4
5	Devonwood Park – W of Spreading Grounds	366,214	3,791,536	0.0083	0.0
6	SFR – SW of Spreading Grounds	366,272	3,791,136	0.0048	0.7
7	SFR – SE of Spreading Grounds	366,526	3,790,962	0.0062	0.8
8	SFR – E of Spreading Grounds	367,107	3,791,450	0.0073	1.1
9	SFR – E of Spreading Grounds	367,095	3,791,634	0.0087	1.3
10	SFR – SE of Paxton Street	367,081	3,791,995	0.0197	3.3
11	MFR – SE of Paxton Street	367,267	3,792,154	0.0155	2.5
12	SFR – S of Devonshire Street	366,025	3,791,611	0.0140	2.3
Threshold of Significance					10.0
Exceeds Threshold?					No
µg/m³: micrograms per cubic meter; Diesel PM: diesel particulate matter; SFR: single-family residential; MFR: multi-family residential; NW: northwest; N: north; W: west; SW: southwest; SE: southeast; E: east. * Based on World Geodetic System 1984 (WGS84), Universal Transverse Mercator (UTM). The UTM projection uses two-dimensional (i.e., Cartesian) coordinate system to give locations on the surface of the Earth. The "X" and "Y" represent the two points on the earth that, together, represent the location of each receptor under the UTM system. Source: Vista Environmental 2021.					

Regarding hydrology and water quality, the Recirculated MND addressed the impacts from the Pacoima Spreading Grounds being offline (i.e., no diversion of flows) for up to two wet seasons. For purposes of the Recirculated MND, it was conservatively assumed that implementation of the Project would result in the loss of approximately 10,158 af<sup>3</sup> of water for infiltration. However, it is expected that some or most of the storm water runoff bypassing Pacoima Spreading Grounds during Project construction would be captured for infiltration at downstream LACFCD spreading grounds. With the extended construction period, the Pacoima Spreading Grounds would remain offline for up to three complete wet seasons resulting in a conservative estimate of 15,237 af of water bypassing the spreading grounds. The San Fernando Valley Ground Basin is an adjudicated basin, and the Upper Los Angeles River Area Watermaster (ULARA) is charged with determining a safe yield for pumpers to prevent groundwater depletion. The Project is identified in the ULARA's annual reports. As such, the Watermaster would be aware that recharge would not be occurring at the Project site during construction activities and would compensate the safe yield of the basin accordingly in those years. Finally, the proposed Project's increased water recharge of an estimated 10,500 af/y would compensate for the reduced recharge of approximately 10,158 af within a short time, depending on annual rainfall amounts. For all of these reasons, the temporary loss of Pacoima Spreading Grounds use for up to three storm seasons during construction activities would not interfere substantially with groundwater recharge or result in a lowering of the groundwater table in the San Fernando Valley Groundwater Basin. There would be no new or more significant impacts related to groundwater recharge. There would be no

<sup>3</sup> Twice the average conservation volume of 5,079 af, as construction activities would place the Pacoima Spreading Grounds offline for up to two wet seasons.

changes to the analysis of water quality, drainage pattern and stormwater drainage systems, 100-year flood hazard area, or inundation.

Regarding greenhouse gas (GHG) emissions, modeling illustrates that there would be no new or more significant impacts than disclosed in the Recirculated MND. The Recirculated MND determined there would be maximum total annual GHG emissions of 2,404.87 MTCO<sub>2</sub>e in the worst-case construction year. Therefore, the Project with an extended construction schedule would have approximately 264 MTCO<sub>2</sub>e more GHG emissions per year. However, this would remain below the SCAQMD threshold of 3,000 MTCO<sub>2</sub>e. Also, as discussed in the Recirculated MND, it is noted that this threshold is intended for permanent land use changes, rather than temporary construction activities. Specifically, the construction emissions associated with a project are generally amortized over a 30-year period, and one year's amortized emissions are added to one year's operational emissions. However, to provide a conservative analysis of GHG emissions, the 3,000 MTCO<sub>2</sub>e per year threshold has been applied to the Project's worst-case annual construction activities.

**TABLE 4-5  
ANNUAL GREENHOUSE GAS EMISSIONS**

	<b>Annual GHG Emissions (MTCO<sub>2</sub>e)</b>
On-Site Construction Equipment	636.75
Worker Trips	22.34
Demolition Haul Trucks	0.46
Super 10 Haul Trucks <sup>1</sup>	2008.90
<b>Worst-Case Total Emissions<sup>a</sup></b>	<b>2,668.46</b>
<i>SCAQMD Draft Threshold</i>	<i>3,000</i>
<b>Exceeds Threshold?</b>	<b>No</b>
GHG: greenhouse gas; MTCO <sub>2</sub> e: metric tons of carbon dioxide equivalent	
<sup>1</sup> Based on Super 10 Trucks, which is classified as a Heavy-Heavy Duty (T7) vehicle for modeling purposes	
Source: Vista 2017a (Appendix A).	

Regarding noise, there would be no change to the estimated maximum daily construction noise levels, both on-site and off-site, disclosed in the Recirculated MND. It is noted that Alternative 4, Use of Cal-Mat Pit Only, addressed the environmental impacts, including noise, of all sediment export to Vulcan facilities as solely going to Cal-Mat. This analysis assumes that the number and type off-road construction equipment would be the same as a conservative approach and there would be a similar number of daily truck trips on many days, albeit with slightly smaller haul trucks. While there would still be activity on the site from 9:00 AM to 5:30 PM, the loading and departure/arrival of haul trucks would end earlier in the day. Additionally, some days would have fewer truck trips, and associated excavating and loading of material, than the maximum daily figures in Table 4-1. However, these differences would not result in a substantial reduction in noise generation. Although there would not be an increase in noise levels such that applicable noise standards would be exceeded, resulting in a new or more significant impact, it is acknowledged the longer time frame of construction noise generation at the Project site would be considered adverse to some members of the community. As discussed in Section 2.0 and 3.0 of this document, mitigation (MM NOI-1) was required to build a sound wall to reduce the noise impact along the headworks prior to construction activity in this area (refer to pages 3-72 and 3-73 of the Recirculated MND). Based on public feedback, the LACFCD has opted to also install the sound wall along the private property-facing perimeter (i.e., where the spreading basins abut

private land uses). The sound wall would be at least eight feet high and would be installed prior to construction activities. As such, the maximum construction noise levels would be reduced from what was presented in the Recirculated MND. Therefore, consistent with the findings of the Recirculated MND, there would be a less than significant impact with compliance with RR NOI-1 and implementation of MM NOI-1 related to on-site construction equipment noise or off-site vehicular noise. There would be no changes to the analysis of vibration, permanent (operational) noise levels, or air traffic noise levels.

Regarding transportation and traffic, the number of hourly and daily truck trips on each of the three hauling routes under the new Project scope has been calculated to ensure these figures do not exceed the figures analyzed in the Recirculated MND. Because there would not be an increase in the hourly or total daily trips on the same three haul routes, there would be no new or more significant transportation impacts. Therefore, consistent with the findings of the Recirculated MND, there would be a less than significant impact with compliance with RR TRA-1 and implementation of MMs TRA-1 and TRA-2 related to trip generation associated with export and disposal of 1,377,977 cy of sediment at the Vulcan Materials-owned sediment disposal site and Sunshine Canyon Landfill. There would be no changes to the analysis of conflict with the *2010 Los Angeles County Congestion Management Program*, air traffic patterns, traffic hazards or incompatible uses, emergency access, or alternative transportation policies.

Regarding utilities and service systems, the weekly and total sediment disposal at both Sunshine Canyon Landfill and Vulcan Materials-owned facility would not exceed the permitted capacity of any proposed disposal location. The same total amount of sediment would be exported to these two facilities, but over a longer time frame. Therefore, consistent with the findings of the Recirculated MND, there would be a less than significant impact with compliance with RR UTL-1 related to landfill space and solid waste regulations. There would be no changes in the analysis of wastewater conveyance and treatment, water supplies, or storm water drainage infrastructure.

As stated above, the change in construction scenario to meet the limitations of the disposal locations is not a “substantial revision” as defined under Section 15073.5(b) of the State CEQA Guidelines. There would be no change in the significance of any identified environmental impacts, nor would new mitigation measures or other revisions to the Project be required. Therefore, recirculation of the Recirculated MND is not necessary and no further documentation is required under CEQA.

#### **4.5 SUPPLEMENTAL AIR QUALITY ANALYSIS**

Air quality analysis pursuant to CEQA involves several models and data sources. To ensure the potential air quality effects from the Project are based on the most recent methodologies available, the LACFCD directed the update of the air quality modeling performed in the Recirculated MND. The discussion below is intended to be a comparison of the analysis provided in the Recirculated MND with the same Project parameters but more recent methodologies. As such, this comparison does not reflect the 7,977 cy of additional sediment to be exported due to the intake canal redesign nor the extended construction period. It should be noted this analysis is not required pursuant to CEQA, as the current air quality models in effect at the time the Recirculated MND was prepared and distributed for public review were applied in the analysis. The update was done solely as a matter of due diligence and transparency.

The most substantive change in the modeling software is the release of EMFAC2017 by the California Air Resources Board (CARB), which became available online in March 2020. EMFAC (named after *EMission FACTor*) is a model that estimates the emissions inventories of on-road mobile sources (i.e., vehicles) in California. EMFAC is updated by CARB every three years; previous versions include EMFAC2014, EMFAC2011, and so forth. The air quality analysis in the

Recirculated MND used EMFAC2014, which was the current model the time the Recirculated MND was prepared.

The following summarizes the results of this supplemental air quality analysis. This modeling is based on all the same assumptions applied in the Recirculated MND, with the exception that the construction start date was adjusted from 2018 to 2021. Also, regardless of the results of this analysis, MMs AQ-1 and AQ-2 described in the Recirculated MND, and included below for reference, would be implemented during Project construction.

MM AQ-1 was provided to reduce a significant impact due to regional emissions of NOx.

**MM AQ-1** The Los Angeles County Flood Control District (LACFCD) shall include in the Contractor specifications the requirement that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 Final emissions standards. To provide evidence that the equipment is the appropriate tier, it shall be registered with the California Air Resources Board and labelled detailing that the equipment meets Tier 4 emissions standards. This requirement shall be monitored by LACFCD's on-site Construction Inspector, when inspecting the site.

MM AQ-2 was provided to reduce a significant impact due to local emissions of PM10.

**MM AQ-2** Prior to the start of haul truck operations, the Los Angeles County Flood Control District (LACFCD) shall include in the Contractor specifications the requirement that the top of the central levee spanning the spreading grounds in a northeast-southwest direction be paved or a Roadway Mat System that is no less effective than a paved road at controlling fugitive dust emissions, be installed. In order to eliminate an adequate amount of unpaved surface to reduce dust emissions to a less than significant level, the paving or Roadway Mat System shall be of sufficient length to cover the greater of either: (1) a minimum of 25 percent of the total off-road path length being utilized by the haul trucks within the spreading grounds or (2) a minimum of 660 linear feet of the paving or Roadway Mat System. The paving or Roadway Mat System shall be routinely inspected and maintained by the Contractor as often as needed to ensure the integrity of the surface and eliminate fugitive dust emissions from the off-road segments with this treatment. The haul truck drivers shall be directed to drive on the paving or Roadway Mat System exclusively unless there is no feasible alternative. The condition and use of the paved/matted levee roads shall be monitored by LACFCD's on-site Construction Inspector when inspecting the site.

## **Regional Emissions**

Air quality emissions are calculated using the California Emissions Estimator Model (CalEEMod), which is a computer program published by the SCAQMD and is the approved software for estimating anticipated emissions associated with land development projects in California. Since the preparation of the Recirculated MND that used CalEEMod Version 2016.3.1, CalEEMod Version 2016.3.2 was released. The only changes between versions is the platform of the software that changed from Excel to Access. Both versions rely on EMFAC 2014 and OFFROAD 2011 for the emission rates. CalEEMod will eventually be updated to include use of EMFAC2017. Because of the complexities of CalEEMod, it is not feasible for an end user to plug in EMFAC2017 as a model or its data to generate emissions results that are an apples-to-apples comparison to those generated by CalEEMod. Regardless, for completeness, a comparison of regional emissions based on the adjusted construction start date was prepared.

The CalEEMod 2016.3.1 results presented in the Recirculated MND without mitigation are shown in Table 4-6 and the updated results (using CalEEMod 2016.3.2 and adjusted construction start date) are shown in Table 4-7.

**TABLE 4-6**  
**ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS**  
**PRIOR TO MITIGATION WITH 2018 CONSTRUCTION START DATE**  
**(LBS/DAY)**

	VOC	NOx	CO	SOx	PM10	PM2.5
On-Site Equipment	4.90	49.67	27.01	0.06	7.29	4.85
Worker Trips	0.11	0.08	0.97	0.00	0.20	0.06
Demolition Haul Trucks	0.00	0.04	0.01	0.00	0.03	0.00
14-cy Haul Trucks	2.23	36.89	19.00	0.10	42.09	8.50
18-cy Haul Trucks	1.84	66.02	13.63	0.13	26.34	5.02
<b>Total Emissions*</b>	<b>6.85</b>	<b>115.81</b>	<b>46.99</b>	<b>0.19</b>	<b>49.61</b>	<b>13.41</b>
<i>SCAQMD Thresholds</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
<b>Exceeds Threshold?</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

lbs/day: pounds per day; VOC: volatile organic compound(s); NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; cy: cubic yards; SCAQMD: South Coast Air Quality Management District.

Source: Vista Environmental 2020.

**TABLE 4-7**  
**ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS**  
**PRIOR TO MITIGATION WITH 2021 CONSTRUCTION START DATE**  
**(LBS/DAY)**

	VOC	NOx	CO	SOx	PM10	PM2.5
On-Site Equipment	4.90	38.67	25.34	0.06	6.71	4.32
Worker Trips	0.08	0.05	0.73	0.00	0.20	0.05
Demolition Haul Trucks	0.00	0.03	0.01	0.00	0.01	0.00
14-cy Haul Trucks	0.97	21.58	11.58	0.10	39.53	7.68
18-cy Haul Trucks	1.51	56.78	12.27	0.12	25.07	4.85
<b>Total Emissions*</b>	<b>5.68</b>	<b>95.53</b>	<b>37.66</b>	<b>0.18</b>	<b>46.45</b>	<b>12.05</b>
<i>SCAQMD Thresholds</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

lbs/day: pounds per day; VOC: volatile organic compound(s); NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; cy: cubic yards; SCAQMD: South Coast Air Quality Management District.

Source: Vista Environmental 2020.

As shown in Tables 4-6 and 4-7 based on start of construction moved to 2021, there would no longer be a significant impact from regional NOx emissions without mitigation. As noted above, MM AQ-1 would still be implemented. The reason that estimated emissions went down in Table 4-7 based on the change in construction date is because the air quality models assume that the vehicle mix operating on the roads have improved tailpipe emissions over time. It is also noted that these results assume that the haul trucks reflect an average fleet mix, whereas the LACFCD would require the contractor to use trucks that meet 2010 emissions standards. Therefore, in



reality, the worst-case regional criteria pollutant emissions would be lower than estimated in Table 4-7.

### Local Emissions

The local criteria pollutant analysis was also updated with the new version of CalEEMod and based on 2021 construction start. Based on this, no changes to the initial screening-level findings according to the SCAQMD's localized significance threshold (LST) method occurred, and NOx, CO and PM2.5 were screened out from further analysis (i.e., dispersion modeling with AERMOD) and required further analysis of local PM10 emissions. The Recirculated MND used AERMOD Version 9.4.0 and the current version is Version 9.9.0. The changes between versions related to allowing for more data sources to be entered and more software viewer features.

**TABLE 4-8  
LOCAL FUGITIVE DUST CONCENTRATIONS WITH AND WITHOUT MITIGATION  
WITH 2018 CONSTRUCTION START DATE**

Receptor ID	Receptor Description	Receptor Location <sup>a</sup>		24-Hour PM10 Concentrations (µg/m <sup>3</sup> )	
		X	Y	Unmitigated	Mitigated (MMs AQ-1 and AQ-2)
1	SFR – NW of Intake Structure	367,030	3,792,240	6.84	5.05
2	SFR – N of Spreading Grounds	366,644	3,792,082	<b>11.69</b>	8.62
3	SFR – NW of Spreading Grounds	366,494	3,791,913	<b>12.59</b>	9.28
4	SFR – W of Spreading Grounds	366,294	3,791,729	<b>12.21</b>	9.01
5	Devonwood Park – W of Spreading Grounds	366,214	3,791,536	<b>12.40</b>	9.15
6	SFR – SW of Spreading Grounds	366,272	3,791,136	7.67	5.66
7	SFR – SE of Spreading Grounds	366,526	3,790,962	8.90	6.57
8	SFR – E of Spreading Grounds	367,107	3,791,450	<b>12.99</b>	9.58
9	SFR – E of Spreading Grounds	367,095	3,791,634	<b>11.87</b>	8.75
10	SFR – SE of Paxton St	367,081	3,791,995	8.74	6.44
11	MFR – SE of Paxton St	367,267	3,792,154	4.96	3.66
12	SFR – S of Devonshire Street	366,025	3,791,611	6.24	4.60
<i>Threshold of Significance<sup>b</sup></i>				10.4	10.4
<b>Exceeds Threshold?</b>				<b>Yes (in bold)</b>	<b>No</b>
µg/m <sup>3</sup> : micrograms per cubic meter; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; SFR: single-family residential; MFR: multi-family residential; NW: northwest; N: north; W: west; SW: southwest; SE: southeast; E: east.					
<sup>a</sup> Based on World Geodetic System 1984 (WGS84), Universal Transverse Mercator (UTM). The UTM projection uses two-dimensional (i.e., Cartesian) coordinate system to give locations on the surface of the Earth. The "X" and "Y" represent the two points on the earth that, together, represent the location of each receptor under the UTM system.					
<sup>b</sup> SCAQMD Thresholds of Significance (taken from <a href="http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2">http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2</a> ).					
Source: Vista Environmental 2020.					

**TABLE 4-9  
LOCAL FUGITIVE DUST CONCENTRATIONS WITH AND WITHOUT  
MITIGATION WITH 2021 CONSTRUCTION START DATE**

Receptor ID	Receptor Description	Receptor Location <sup>a</sup>		24-Hour PM10 Concentrations (µg/m <sup>3</sup> )	
		X	Y	Unmitigated	Mitigated (MMs AQ-1 and AQ-2)
1	SFR – NW of Intake Structure	367,030	3,792,240	5.72	4.32
2	SFR – N of Spreading Grounds	366,644	3,792,082	9.41	7.10
3	SFR – NW of Spreading Grounds	366,494	3,791,913	9.42	7.11
4	SFR – W of Spreading Grounds	366,294	3,791,729	9.90	7.47
5	Devonwood Park – W of Spreading Grounds	366,214	3,791,536	9.94	7.50
6	SFR – SW of Spreading Grounds	366,272	3,791,136	8.49	6.40
7	SFR – SE of Spreading Grounds	366,526	3,790,962	7.25	5.47
8	SFR – E of Spreading Grounds	367,107	3,791,450	10.37	7.83
9	SFR – E of Spreading Grounds	367,095	3,791,634	9.74	7.34
10	SFR – SE of Paxton St	367,081	3,791,995	6.38	4.81
11	MFR – SE of Paxton St	367,267	3,792,154	3.89	2.94
12	SFR – S of Devonshire Street	366,025	3,791,611	5.38	4.06
Threshold of Significance <sup>b</sup>				10.4	10.4
Exceeds Threshold?				No	No
µg/m <sup>3</sup> : micrograms per cubic meter; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; SFR: single-family residential; MFR: multi-family residential; NW: northwest; N: north; W: west; SW: southwest; SE: southeast; E: east.					
<sup>a</sup> Based on World Geodetic System 1984 (WGS84), Universal Transverse Mercator (UTM). The UTM projection uses two-dimensional (i.e., Cartesian) coordinate system to give locations on the surface of the Earth. The "X" and "Y" represent the two points on the earth that, together, represent the location of each receptor under the UTM system.					
<sup>b</sup> SCAQMD Thresholds of Significance (taken from <a href="http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2">http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2</a> ).					
Source: Vista Environmental 2020.					

The CalEEMod results presented in the Recirculated MND are shown in Table 4-8 and the updated results are shown in Table 4-9. As shown, based on start of construction moved to 2021, there would no longer be a significant impact from local PM10 emissions without mitigation. It should be noted that the PM10 concentration at Receptor Location 8 is at the threshold of 10.4 with rounding. Regardless, as noted above, MMs AQ-1 and AQ-2 would still be implemented. Also, as discussed above, these results assume that the haul trucks reflect an average fleet mix, whereas the LACFCD would require the contractor to use trucks that meet 2010 emissions standards. Therefore, in reality, the worst-case local criteria pollutant emissions would be lower than estimated in Table 4-9. Additionally, the LACFCD has determined to voluntarily include air monitoring for PM10; the requirements for this monitoring will be included in the Contractor specifications.

### **Health Risk Assessment (Cancer Risk)**

The AERMOD model is also used as part of preparing a Health Risk Assessment (HRA). As noted above, the version of the AERMOD model has changed since preparation of the Recirculated MND. As mentioned previously, EMFAC2017 has been released but is not yet incorporated into CalEEMod. However, EMFAC emissions data is part of HRA preparation; therefore, EMFAC2017 data provided via CARB's website is reflected in the updated HRA results.

It is noted that the SCAQMD released *Risk Assessment Procedures for Rules 1401, 1401.1 and 212*, on September 1, 2017. These remain the current procedures and were used in the Recirculated MND air quality analysis. Specifically, an analysis of construction-related impacts from anticipated diesel particulate matter (PM) (toxic air contaminant) emissions on sensitive receptors near the Pacoima Spreading Grounds was performed based on dispersion modeling (i.e., the HRA).

**TABLE 4-10  
DIESEL PM10 LEVELS AND CANCER RISK WITH MITIGATION (MM AQ-1)  
AND 2018 CONSTRUCTION START DATE**

Receptor ID	Receptor Description	Receptor Location*		Annual PM10 Concentration (µg/m³)	Cancer Risk Per Million People
		X	Y		
1	SFR – NW of Intake Structure	367,030	3,792,240	0.1707	8.4
2	SFR – N of Spreading Grounds	366,644	3,792,082	0.1114	5.7
3	SFR – NW of Spreading Grounds	366,494	3,791,913	0.0733	4.1
4	SFR – W of Spreading Grounds	366,294	3,791,729	0.0803	5.9
5	Devonwood Park – W of Spreading Grounds	366,214	3,791,536	0.0997	0.1
6	SFR – SW of Spreading Grounds	366,272	3,791,136	0.0532	2.7
7	SFR – SE of Spreading Grounds	366,526	3,790,962	0.0858	4.2
8	SFR – E of Spreading Grounds	367,107	3,791,450	0.0952	4.8
9	SFR – E of Spreading Grounds	367,095	3,791,634	0.0904	4.8
10	SFR – SE of Paxton Street	367,081	3,791,995	0.0627	4.2
11	MFR – SE of Paxton Street	367,267	3,792,154	0.0412	2.9
12	SFR – S of Devonshire Street	366,025	3,791,611	0.01707	8.4
Threshold of Significance					10.0
Exceeds Threshold?					No
µg/m³: micrograms per cubic meter; Diesel PM: diesel particulate matter; SFR: single-family residential; MFR: multi-family residential; NW: northwest; N: north; W: west; SW: southwest; SE: southeast; E: east.					
* Based on World Geodetic System 1984 (WGS84), Universal Transverse Mercator (UTM). The UTM projection uses two-dimensional (i.e., Cartesian) coordinate system to give locations on the surface of the Earth. The "X" and "Y" represent the two points on the earth that, together, represent the location of each receptor under the UTM system.					
Source: Vista Environmental 2020.					

**TABLE 4-11**  
**DIESEL PM10 LEVELS AND CANCER RISK WITH MITIGATION (MM AQ-1),**  
**EMFAC2017, AND 2021 CONSTRUCTION START DATE**

Receptor ID	Receptor Description	Receptor Location*		Annual PM10 Concentration (µg/m³)	Cancer Risk Per Million People
		X	Y		
1	SFR – NW of Intake Structure	367,030	3,792,240	0.0578	1.6
2	SFR – N of Spreading Grounds	366,644	3,792,082	0.0394	1.4
3	SFR – NW of Spreading Grounds	366,494	3,791,913	0.0284	1.7
4	SFR – W of Spreading Grounds	366,294	3,791,729	0.0406	5.4
5	Devonwood Park – W of Spreading Grounds	366,214	3,791,536	0.0385	0.0
6	SFR – SW of Spreading Grounds	366,272	3,791,136	0.0190	0.8
7	SFR – SE of Spreading Grounds	366,526	3,790,962	0.0293	0.9
8	SFR – E of Spreading Grounds	367,107	3,791,450	0.0330	1.1
9	SFR – E of Spreading Grounds	367,095	3,791,634	0.0329	1.4
10	SFR – SE of Paxton Street	367,081	3,791,995	0.0287	2.8
11	MFR – SE of Paxton Street	367,267	3,792,154	0.0198	2.1
12	SFR – S of Devonshire Street	366,025	3,791,611	0.0578	5.8
Threshold of Significance					10.0
Exceeds Threshold?					No
µg/m³: micrograms per cubic meter; Diesel PM: diesel particulate matter; SFR: single-family residential; MFR: multi-family residential; NW: northwest; N: north; W: west; SW: southwest; SE: southeast; E: east.					
* Based on World Geodetic System 1984 (WGS84), Universal Transverse Mercator (UTM). The UTM projection uses two-dimensional (i.e., Cartesian) coordinate system to give locations on the surface of the Earth. The "X" and "Y" represent the two points on the earth that, together, represent the location of each receptor under the UTM system.					
Source: Vista Environmental 2020.					

The CalEEMod results presented in the Recirculated MND are shown in Table 4-10 and the updated results are shown in Table 4-11. As shown, with implementation of MM AQ-1, use of EMFAC2017 emission rates, and a 2021 construction start date, the cancer risk calculations remain below the threshold of significance. The modeling indicates that all the resulting risk would be lower at all 12 receptor locations compared to the results presented in the Recirculated MND. Also, as noted above, these results assume that the haul trucks reflect an average fleet mix, whereas the LACFCD would require the contractor to use trucks that meet 2010 emissions standards. Therefore, in reality, the health risk would be lower than estimated in Table 4-s. Additionally, the LACFCD has determined to voluntarily include air monitoring for PM10; the requirements for this monitoring will be included in the Contractor specifications.

## **Conclusion**

Based on the updated modeling, there would be no new or more significant air quality-related impacts compared to what was presented in the Recirculated MND, and no new mitigation measures would be required. While they would no longer be needed to reduce regional and local criteria pollutant emissions, MMs AQ-1 and AQ-2 would be implemented as described in the Recirculated MND.