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**RESPONSES TO COMMENTS ON THE  
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION  
FOR THE GRIFFITH PARK SOUTH WATER RECYCLING PROJECT**

Thank you for your comments (Letter No. 2) on the Initial Study/Mitigated Negative Declaration (IS/MND) for the Griffith Park South Water Recycling Project. Your comments and a response to your comments are provided as follows:

**Comment Letter 2: City of Los Angeles Department of Recreation and Parks**

**2-A** *In response to Comment 2-A, an editorial addition has been made to Section 1.2.1, Project Background, of this Final MND as follows:*

The Los Angeles Department of Water and Power (LADWP) proposes to expand its existing recycled water system within the Central Los Angeles area with the Griffith Park South Water Recycling Project ("GPSWRP" or "proposed project").

**2-B** *In response to Comment 2-B, an editorial addition has been made to Section 1.3, Project Location, of this Final MND as follows:*

Griffith Park is owned and operated by the City of Los Angeles Department of Recreation and Parks (LARAP).

**2-C** *In response to Comment 2-C, an editorial addition has been made to Figure 2 of this Final MND as follows:*

Crystal Springs Dr. and Griffith Park Dr. have been added as reference landmarks. See revised Figure 2.

2-D *In response to Comment 2-D, an editorial addition has been made to Section 1.4, Project Description of this Final MND as follows:*

Proposed project facilities include:

- Proposed recycled water pump house station to be located on the east side of Fire Road. There would be one pump house, two operating pumps and one back-up pump. A minimum flow of 1,400 gallons per minute (gpm) would be required to fill the proposed recycled water tank in 12 hours. Each pump would have 150 horsepower.
- 2,100 linear feet of 12-inch pipeline, connecting the exiting Greenbelt pipeline to the proposed pump station east of Fire Road;
- 2,500 linear feet of 12-inch pipeline from the proposed horizontal directional drilling (HDD) launching pit to the HDD receiving pit near the proposed recycled water storage tank;
  - HDD is being used because trenching or excavating is not practical since it would result in significant biological and aesthetic impacts.
  - With use of HDD, most of the ground surface remains undisturbed, lessening the environmental impact of placing pipeline.
  - Trenchless technology protects natural resources such as sensitive habitats by drilling underneath the resources.
- 1,400 linear feet of 12-inch pipeline from the HDD receiving pit to the proposed recycled water storage tank;
- 700 linear feet of 12-inch pipeline from the proposed recycled water tank to the existing 1,200 linear feet 8-inch steel pipeline, connecting to the Roosevelt Golf Course;
- 700 linear feet of 12-inch pipeline from the proposed recycled water tank to the existing 1,544 foot Grade Potable System to be used as a potable back-up pipeline;
- Regulator Valve and Relief Valve System located adjacent to the pump station;
- Bolt-up steel recycled water pumping station located on the east side of Fire

Road within LADWP easement;

- Steel recycled water storage tank with a capacity of 1 million gallons to be located southeast of the existing Tank 114;
- Removal of the steel structure and wooden roof of the existing Tank 114 and;
- Appurtenant facilities for the pipelines.

2-E *In response to Comment 2-E, an editorial addition has been made to Section 1.4, Project Description of this Final MND as follows:*

The proposed project would begin at the existing Greenbelt Water Recycling pipeline located near the Park Center Picnic Area ~~Merry-Go-Round area along Crystal Spring Drive in of Griffith Park; located in Park Center between the Los Angeles Zoo and the Los Feliz park entrance.~~ The Park Center is located on Crystal Spring Drive between Griffith Park Drive and the Fire Road adjacent to the Ranger Station and Griffith Park Visitor Center.

2-F *In response to Comment 2-F, an editorial addition has been made to Section 1.4, Project Description of this Final MND as follows:*

Approximately 2,100 linear feet of a 12-inch pipeline would connect to an existing 8-inch recycled water pipeline located southwest of the intersection of Griffith Park Drive and Crystal Springs Drive. The pipeline would be installed along Crystal Springs Drive, commencing in the area in front of the park center. The pipe would head south bound on Crystal Springs Drive, continue east along the Fire Road, and terminate near the entrance to Fern Canyon Trail above the Merry-go-round where it will connect with the proposed Griffith Park South Pump Station ~~within the existing roadway and connect north of the proposed recycled water pump station located on the east side of Fire Road. The pipeline would connect to a new pump station.~~ From the pump station, the pipeline would continue for approximately 2,500 feet and would be installed using the HDD construction method (~~tunneling~~ trenchless drilling method beneath the surface) to avoid aesthetic, biological, and recreational (on the public) impacts within the park. Approximately 1,400 linear feet of 12-inch pipeline would be constructed from the HDD receiving pit to a new recycled water storage tank, to be located southeast of existing Tank 114.

2-G and 2-M *In response to Comments 2-G and 2-M, the following changes have been made to Figure 3 of this Final MND as follows:*

Fire road has been shown on the figure for reference to the text. In addition, Griffith Park

land marks used in the text such as the Merry-Go-Round and Fern Canyon Nature Trail have been added to the Figure. See revised Figure 3.

2-H and 2-I *In response to Comment 2-H and 2-I, an editorial addition has been made to Section 1.4, Project Description of this Final MND as follows:*

A recycled water pump station would be located on the east side of Fire Road within a LADWP easement. It would be located on a 40-foot by 50-foot pad. The proposed pump station would consist of two operating pumps and one back-up pump. A minimum flow of 1,400 gallons per minute (gpm) would be required to fill the proposed recycled water tank in 12 hours. The base elevation of the pump station would be at approximately 525 feet. The base elevation of the recycled water tank is approximately 1,110 feet, the tank fill elevation would be at approximately 1,136 1,140 feet and the top of the tank would at 1,140 feet; the head required to lift the water would be 615 feet. The pumps ~~station would be approximately 10 feet high and~~ would be enclosed within a one-story small housing structure to protect and secure the pump station. The pump station (e.g., small one-story housing structure) would be approximately 10 feet high.

2-J *In response to Comment 2-J, an editorial addition has been made to Section 1.4, Project Description of this Final MND as follows:*

The recycled water storage tank would replace the existing steel Tank 114 and would be approximately 30 feet high. The existing Tank 114 would be demolished, aboveground appurtenances removed, and the existing foundation abandoned.

2-K *The commenter questions the difference between the 1,140 feet and 1,110 feet in regards to the water tank.*

The first paragraph references the tank fill elevation and the second paragraph references the tank base elevation; a difference of approximately 30 feet, the height of the tank.

2-L *In response to Comment 2-L, an editorial change has been made to Section 1.4, Project Description of this Final MND as follows:*

The proposed recycled water storage tank would have a holding capacity of 1 million gallons that would provide additional capacity for future customers that have been identified in the Recycled Water Master Planning Documents. ~~The proposed recycled water storage tank would be partially buried 10 feet below the existing ground elevation and would have a base elevation of approximately 1,110 feet.~~ The proposed recycled



water storage tank would also have a potable water back-up ~~supplied from the existing 1,544 foot grade potable water system~~ supplied from the existing 1,544 service zone.

- 2-N *Comment 2-N: The commenter state that Section 1.4.1 Project Construction should include cumulative construction activities and states the start date for the project is unlikely since Board of Recreation and Park Commission needs to grant approval for easements and right-of-way.*

Project construction is included in the cumulative analysis for the project found in Section 2.18 Mandatory Findings response b), and includes the projects listed in the comment letter. In addition, Section 1.4.1 list construction activities specific to this project. It is acknowledged the construction start has slipped beyond that estimated in the MND.

- 2-O *In response to Comment 2-O, an editorial change has been made to Section 1.4.1, Project Construction of this Final MND as follows:*

The proposed cut and cover pipelines would be installed using trenching construction techniques, except for the segment extending from Fern Canyon Nature Trail head to the top of the hill near Cedar Grove ~~proposed recycled water tank~~. This segment would be installed using HDD method, which is a trenchless method of installing underground pipeline and has minimal impact on the surrounding area. HDD is being proposed to avoid closing of the Fern Canyon Nature Trail and to prevent adverse visual impacts at Griffith Park.

- 2-P *In response to Comment 2-P, an editorial change has been made to Section 1.4.1, Project Construction of this Final MND as follows:*

The construction of the proposed project would commence on ~~January~~ March 02, 2014 and is anticipated to be completed by ~~March~~ October 09, 2017~~5~~. The project would be constructed in ~~three~~ four separate phases, including the cut and cover pipeline phase, the HDD pipeline phase, and tank and pump station phase. The cut and cover pipeline phase will include two separate segments or phases; Phase 1 along Crystal Springs Drive and Fire Road and Phase 2 at the top of the hill on Vista Del Valle Drive from Cedar Grove to Vista View point where the proposed tank would be located. Each phase component is described separately below. Regional access to the construction site would be via I-5. Construction access to the various parts of the alignment would be via Crystal Springs Drive from the I-5, Western Heritage Way from SR-134, and Fire Road adjacent to Crystal Springs Drive in Griffith Park. The proposed project would prepare a traffic control plan that would be reviewed and approved by the Los Angeles Department

of Transportation.

- 2-Q *In response to Comment 2-Q, an editorial change has been made to Section 1.4.1, Project Construction of this Final MND as follows:*

**Cut and Cover Pipelines**

Construction activities would avoid disrupting activities at Griffith Park. The cut and cover pipeline phase will include two separate segments or phases; Phase 1 along Crystal Springs Drive and Fire Road, and Phase 2 at the top of the hill on Vista Del Valle Drive from Cedar Grove to Visa View point where the proposed tank would be built. The construction staging and parking area for Phase 1 of the cut and cover pipeline installation would be located near the Merry-Go-Round parking area, with access from Fire Road (Figure 3). Construction staging and parking area for Phase 2 of the cut and cover pipeline installation would be located at near the proposed tank and the exiting Tank 114, with access from Vista Del Valle Drive (Figure 3). Construction would occur five days a week, between the hours of 8:00 a.m. to 3:00 p.m.

- 2-R *The commenter states fix Phase 1 and 2 problem. The commenter further states the math implies only workers will generate truck trips and the potential amount of dirt being removed does not seem to be reflected. On page 18, there are 18 truck trips per day alone quoted for hauling.*

Refer to response to Comment 2-P and 2-Q for a response regarding phases 1 and 2.

- 2-S *The commenter states fix Phase 1 problem. The start date for the project is unlikely.*

Refer to response to Comment 2-P and 2-Q for a response regarding phases 1 and 2 and 2-N for response regarding project construction.

- 2-T *The commenter states to add "Phase 3" and consider rearranging with the HDD Pipeline "Phase 2" section.*

Clarifications have been made consistent with previous comments. The project would be constructed in four separate phases, the cut and cover pipeline phases (2), the HDD pipeline phase, and tank and pump station phase. Each component is described separately in the MND document. The cut and cover pipeline has two subphases, which are identified as Phase 1 and 2. However, no further change is considered necessary.

- 2-U *The commenter states the same confusion on the number of workers and truck trips*

*without explanation of their relationship.*

The project would be constructed in four separate phases, including the cut and cover pipeline phases (2), the HDD pipeline phase, and tank and pump station phase. Each component is described separately and provides separate construction details since they will be constructed at different times. However, the analysis assumes the worst case scenario in terms of the maximum amount of construction from each phase on the project site. Approximately 36-39 haul truck round-trips would occur per day during Phase 1 and 2 pipeline installations and approximately 21 roundtrips per day generated by construction workers. Approximately 15 haul truck round-trips would occur per day during HDD pipeline installation and approximately 7 roundtrip per day generated by construction workers. Approximately 103 haul truck round-trips would occur per day during tank replacement and pump station construction and approximately 145 roundtrip per day generated by construction workers.

2-V *Response to Comment 2-V: The commenter states clarify if there are overlapping staging and construction areas.*

Refer to Figure 3 which identifies construction staging areas. Each phase uses the same staging and construction areas, but over different time periods.

2-W *The commenter states the same confusion on the number of workers and truck trips without explanation of their relationship.*

Refer to response to Comment 2-R, 2-T, and 2-U for response regarding project construction.

2-X *In response to Comment 2-X, an editorial change has been made to Section 1.4.2, Project Operation of this Final MND as follows:*

## **1.4.2 Project Operation**

Operation and maintenance activities for the proposed project would be minimal and limited to intermittent pipeline, pump station and recycled water storage tank maintenance, generally not to exceed once per month. The proposed project would require minimal maintenance and monitoring related to periodic inspection for possible leaks and repairs. Infrequent routine maintenance activities would occur on average once per quarter.

**2-Y** *In response to Comment 2-Y, an editorial change has been made to Section 1.5, Alternatives Considered but Withdrawn of this Final MND as follows:*

LADWP has been working collaboratively with LARAP to find and implement the best possible project with the least disruptive impacts to Griffith Park environment and operations.

**2-Z** *In response to Comment 2-Z, an editorial change has been made to Section 1.5, Alternatives Considered but Withdrawn of this Final MND as follows:*

Retrofitting existing Tank 4114, rather than complete replacement, was considered. However, structural and corrosion testing led to the conclusion that this alternative was not suitable, as extensive retrofitting was required. An alternative new tank location was also considered at the footprint of existing Tank 114. However, due to the large size of the tank and the proximity of several oak trees, it was decided that the proposed site was more suitable, since removal of oaks would ~~not be required~~ avoided.

**2-AA** *In response to Comment 2-AA, an editorial change has been made to Section 1.5, Alternatives Considered but Withdrawn of this Final MND as follows:*

Four alternate pipeline alignments were considered. Two alternative pipeline routes were considered for the segment of pipeline between the Recycled Water Greenbelt line and the foot of Fern Canyon Nature Trailhead where a pump station was proposed. These were not chosen as the preferred alternative due to construction difficulties (impacts to park operations) and increased costs.

**2-AB** *Response to Comment 2-AB: the commenter states the alternative pump station does not make sense because the location of the proposed pump station is location in the same general area and has not differentiated from the same Griffith Park landmark.*

The alternatives to this project are constrained to the same general area given the project's objective to provide the recycled water to the golf course using the existing greenbelt recycled water pipeline. In addition, alternatives for the pump station did include use of the existing restroom building in the park area and the concession stand. However, these options were not considered viable due to future uses associated with those buildings.

**2-AC** *In response to Comment 2-AC, an editorial change has been made to Section 1.6, Discretionary Approvals Required for the Project of this Final MND as follows:*



**Table 1** presents a preliminary list of the agencies and entities with discretionary approval over the GPSWRP.

**TABLE 1  
 DISCRETIONARY PERMITS POTENTIALLY REQUIRED**

Agency	Permits and Authorizations Required	Activities Subject to Regulations
California State Division of Occupational Safety and Health	<ul style="list-style-type: none"> <li>• Permit for trench construction</li> </ul>	<ul style="list-style-type: none"> <li>• Any excavation activity five feet or deeper</li> </ul>
State Water Resources Control Board, Division of Water Quality	<ul style="list-style-type: none"> <li>• State Wide Construction General Permit</li> </ul>	<ul style="list-style-type: none"> <li>• Construction on a site of more than one acre</li> </ul>
County of Los Angeles Department of Public Works	<ul style="list-style-type: none"> <li>• Discharge Permit</li> </ul>	<ul style="list-style-type: none"> <li>• Construction dewatering and hydrostatic test water discharge into the storm system and channels</li> </ul>
City of Los Angeles Department of Public Works, Bureau of Sanitation	<ul style="list-style-type: none"> <li>• Industrial Waste Permit</li> </ul>	<ul style="list-style-type: none"> <li>• Pump or chlorine discharge water</li> </ul>
City of Los Angeles Department of Recreation and Parks, <u>Board of Recreation and Parks Commission</u>	<ul style="list-style-type: none"> <li>• Memorandum of Understanding</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Between LADWP and LARAP concerning ownership of facilities; and easements and <u>right-of-entry permit</u> for facilities to be installed</li> </ul>
California Department of Public Health	<ul style="list-style-type: none"> <li>• Submittal of design drawings</li> </ul>	<ul style="list-style-type: none"> <li>• Submittal of design drawings</li> </ul>
County of Los Angeles Department of Public Health	<ul style="list-style-type: none"> <li>• Submittal of on-site drawings</li> </ul>	<ul style="list-style-type: none"> <li>• Coordinate with LACDPH to conduct cross-connection inspection during construction and testing prior to going into service</li> </ul>
<u>Los Angeles Department of Transportation</u>	<ul style="list-style-type: none"> <li>• Traffic Control Plan</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Permit oversized vehicles</u></li> <li>• <u>Construction Traffic</u></li> </ul>

2-AD *Response to Comment 2-AD, the commenter states to explain how the broad vistas of Griffith Park will not be significantly affected by the storage tank.*

Griffith Park Tank No. 114 is a ground-level water storage tank built in 1943. The tank is constructed of riveted steel plates with a timber roof cover supported by the tank wall and a center post. The tank sits on a concrete ring foundation. The tank measures 30 feet in height and 35 feet in diameter, with estimated wall thickness is 7/8 inches, and has a capacity of 215,898 gallons. According to LADWP, the tank was taken out of

service as a result of leakage in 2000. The tank is severely corroded and structural damage has occurred to the floor and wall as a result of pitting corrosion. The lower reaches of the tank wall are covered in graffiti. Construction activities and installation of the proposed recycled water storage tank would alter the visual character of the proposed project site, as identified in Section 2.1.c). However, the proposed recycled water storage tank would be the same height, painted and finished to complement the existing natural area and would replace the older existing tank structure that is currently visible and of similar height. The new tank may appear wider but would not be taller. This change in viewshed is not considered significant.

2-AE *Response to Comment 2-AE: the commenter questions the workers listed.*

Refer to response to Comment 2-P, 2-Q, 2-R, 2-T, 2-U for a response regarding phases and construction workers listed.

2-AF *Response to Comment 2-AF: the commenter questions why Table 3 only shows pipeline trenching and questions about HDD hauling and pump house construction? The commenter states Appendix A data emissions sheets were not included.*

Table 3 presents the worst case daily emissions which would occur during pipeline installation in 2014 due to overlapping pipeline installation and paving activities. As shown in Table 3, projected emissions from vehicles and construction equipment and truck and worker trips would be below significance thresholds and would not result in a significant impact. HDD activities and pump station and tank replacement activities occur over different time periods and while there is more truck traffic trips associated with those phases, the paving activities result in the highest emission levels. However, these activities would be less than the worst case scenario identified under pipeline installation as a result of the pavement activities.

The data emission sheets are provided in Appendix C of this Final MND.

2-AG and 2-AH *In response to Comment 2-AG and 2-AH, an editorial change has been made to Section 2.3, Air Quality, letter c) of this Final MND as follows:*

- c) **Less than Significant Impact.** Proposed project construction would result in both dust and exhaust emissions from trenching activities during the construction and installation of the water pipeline and ancillary facilities. SCAQMD Rule 403 requires that fugitive dust emission control measures be implemented to adequately prevent visible dust from leaving the property and to

minimize PM<sub>2.5</sub> and PM<sub>10</sub> emissions.

The commenter further states that no cumulatively considerable net increase of any criteria pollutants were determined.

The approach for assessing cumulative impacts is based on the forecasts of attainment and ambient air quality standards in accordance with requirements of the federal and state clean air acts. Thus, emissions associated with the proposed project would be cumulatively significant if, with mitigation, there remains an increase in a pollutant for which the pollutant is classified as a nonattainment area (i.e., ozone and PM<sub>10</sub>).

As discussed in on page 20 of the MND, the proposed project would not exceed the maximum daily emissions of criteria pollutants (Table 3), would comply with all applicable rules and regulation, and implement recommended mitigation measures, the proposed project would not result in a cumulative considerable net increase of any criteria pollutant.

2-AI *In response to Comment 2-AH, an editorial change has been made to Section 2.4, Biological Resources of the Draft MND as follows:*

**Coast Horned Lizard, Coastal Whiptail, and Silvery Legless Lizard**

According to a biological inventory report prepared for the Trust for Public Land (Cooper, 2009), the coast horned lizard has recently (2009) been confirmed as a rare resident on high ridges of Griffith Park and Cahuenga Peak, where it formerly (until the 1970s) occurred throughout the park's lower slopes and canyons. The coast horned lizard has become extremely rare in the greater Los Angeles metropolitan region, having been extirpated from the entire coastal plain and most of the San Fernando and San Gabriel Valleys. A combination of broad scale habitat modification and the displacement of native harvester ants by non-native Argentine ants have been implicated in declines within Los Angeles County. The coastal whiptail has been found in the upper portions of Griffith Park in open, sparsely vegetated areas. Suitable habitat for the silvery legless lizard is present within the oak woodland and chaparral communities, particularly where there is a layer of leaf litter present. Both All reptile species have the potential to occupy portions of the project site.

2-AJ *Response to Comment 2-AJ: the commenter questions the significance of the last statement under special-status species: "The precipitation levels for the 2012-2013 rainy season were below average in Southern California and all the plants with a moderate or greater potential to occur would be either drought deciduous or would have bloomed*

earlier in the season under these drier than average environmental conditions.”

The significance of the of the last statement is to clarify that while the 2012-2013 rainy season was below average in terms of rainfall received, evidence of special-status plants would have been seen during the site reconnaissance to determine presence. This is because drought deciduous refers to plants that drop their leaves during the dry season or periods of dryness; leaving behind evidence of its presence or because it would have already bloomed.

2-AK *Response to Comment 2-AK: the commenter recommends deleting the first and second sentences due to redundancy and move the remainder of the paragraph up to previous paragraph.*

This comment is noted for the record. This recommendation does not change the context or significance of the analysis. Therefore, this change was not implemented.

2-AL *In response to Comment 2-AL, an editorial change has been made to Section 2.4, Biological Resources, of the Draft MND as follows:*

**Reptiles**

The Project site contains suitable scrub and woodland habitat for the coast horned lizard, coastal whiptail, and the silvery legless lizard. However, no impacts would likely occur to these species during Project activities because the majority of habitat impact is to disturbed and/or developed areas where they are less likely to be present. In addition, during mobilization of construction equipment, reptile species within the area would likely disperse due to increased noise level. Direct impacts to special status reptile species could produce direct impacts to reptile species due to project implementation. These impacts would be reduced to less than significant levels with the implementation of Mitigation Mmeasure BIO-3, which requires preconstruction clearance surveys.

2-AM *In response to Comment 2-AM, an editorial change has been made to Section 2.4, Biological Resources, of the Draft MND as follows:*

**Bats**

Although the Project site contains suitable roosting habitat for hoary and silver-haired bats, it is unlikely that these species would be impacted by Project implementation because the Project would limit any potential tree trimming activities during the bat breeding season from March to August. Additionally, potential roosting sites may occur within the trees found within the Project site; however, no direct impact to oak, walnut, and Australian silk oak trees are anticipated to be removed by the proposed project.



Potential roosting habitat for the western mastiff bat can be found within existing buildings and crags adjacent to the Project site in Griffith Park. Potential roost sites would not be impacted by Project activities because no existing buildings and crags would be impacted by the project. The project includes removal of the existing water tank and replacement with a larger recycled water tank in the same general area. Therefore, if the existing water tank was used as a potential roosting site, the tank would be replaced for a similar use at project completion. Direct impacts to the tree roosting species (hoary, silver-haired bat) will be minimized by conducting any pruning activities outside of the breeding season for bats as specified by CDFW. Implementation of mitigation would reduce impacts to less than significant levels. With implementation of ~~m~~Mitigation ~~m~~Measures BIO-3, these potential roosting sites will be identified prior to project implementation and implementation of mitigation would reduce impacts to less than significant levels.

The commenter further states that tree trimming is not mentioned elsewhere.

Tree trimming is not anticipated during construction activities. Tree trimming impacts are identified only as a potential impact and lists the mitigation required to reduce the impact. However, tree trimming activities are not included as part of the project.

2-AN *Response to Comment 2-AN: the commenter states that even no trees will be removed, discuss whether any tree protection zones will be affected during project construction.*

Refer to Mitigation Measure BIO-45. BIO-45 requires that trees shall be considered during Project construction activities including the creation of staging areas, as well as trenching, staging areas and demolition. A qualified arborist shall be present to identify and demarcate protected trees (and its protected zones [1 ½ feet times the diameter of the trunk at breast height]) within the entire Project site that have the potential to be impacted by construction activities and to assist in guiding construction activities to avoid or minimize impacts to protected trees. If any impacts to city protected trees are unavoidable, then the qualified arborist shall assist in processing a permit application with the City of Los Angeles Urban Forestry Division. In such circumstances, a permit shall be obtained prior to performing any project activities that may impact a protected tree.

2-AO *In response to Comment 2-AO, an editorial change has been made to Section 2.4, Biological Resources, of the Draft MND as follows:*

However depending on the timing of construction, eggs and nestlings of bird species with small, well-hidden nests could be subject to loss, which would result in a violation of

the Migratory Bird Treaty Act (MTBA) and Fish and Game Code.

2-AP     *In response to Comment 2-AP and 2-AQ, an editorial change has been made to Section*  
and        *2.4, Biological Resources, the Draft MND as follows:*  
2-AQ

**BIO-45: Protected Trees.** The presence of protected trees shall be considered during Project construction activities including the creation of staging areas, as well as trenching, staging areas and demolition. The following mitigation measures are recommended to avoid impacts to protected trees with the project area:

- A qualified arborist shall be present to identify and demarcate protected trees (and its protected zones [~~i.e., driplines~~ 1 ½ feet times the diameter of the trunk at breast height]) within the entire Project site that have the potential to be impacted by construction activities and to assist in guiding construction activities to avoid or minimize impacts to protected trees.
- Situate all project elements including trenching paths, on existing access routes or within the clearing outside of the ~~drip lines~~ protection zones of protected trees ~~to the greatest extent feasible~~ to prevent damage to protected trees.
- If any impacts to city protected trees are unavoidable, then the qualified arborist shall assist in processing a permit application with the City of Los Angeles Urban Forestry Division. In such circumstances, a permit shall be obtained prior to performing any project activities that may impact a protected tree.

2-AR     *In response to Comment 2-AR, an editorial change has been made to Section 2.4,*  
*Biological Resources, of the Draft MND as follows:*

**BIO-56: Nesting Birds.** A number of resident and seasonal bird species have the potential to nest on the Project site in trees and adjacent vegetation. The following mitigation measures are ~~recommended~~ required to reduce potential impacts to nesting birds during construction activities:

- If construction is scheduled to occur during the non-nesting season (September through January 31), no preconstruction surveys or additional measures are recommended. If construction is scheduled to occur during the breeding season (February 1–August 31), ~~it is recommended that~~ a qualified wildlife biologist shall conduct preconstruction surveys of all potential nesting habitats within 500 feet of construction activities. At least one surveys should

be conducted no more than 3 days prior to construction activities.

- If active nests are found, no-disturbance buffers shall be implemented around each nest based on the species and location of the nest as determined by a qualified biologist. A general buffer distance generally includes 500-feet around any confirmed active raptor nest and a 250-foot buffer around nests of passerine bird species protected in accordance with the MBTA and/or Fish and Game Code. The buffers should be implemented until it is determined by a qualified wildlife biologist that young have fledged and the nest is determined to be inactive.

2-AS *In response to Comment 2-AS, an editorial change has been made to Section 2.4, Biological Resources, of the Draft MND as follows:*

- a) **No Impact.** The proposed project is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan (HCP/NCCP) or other approved local, regional, or state HCPs. However, the project area is located within the Griffith Park Significant Ecological Area (SEA) as defined by the County of Los Angeles. The SEA is described as an extensive, relatively undisturbed island of natural vegetation in an urbanized, metropolitan area. The SEA supports the coastal sage scrub, chaparral, riparian, and southern oak woodland plant communities typical for the interior mountain ranges of Southern California. The proposed project is also located within the Griffith Park Wildlife Management Plan area as defined by the Los Angeles Department of Recreation and Parks. While this plan is not an official designation, the This plan establishes a baseline in terms of known threats to wildlife and includes Best Management Practices (BMPs) that help assist the Los Angeles Department of Recreation and Parks staff in making land management decisions in Griffith Park and the surrounding open space areas. The proposed project would follow the recommended BMPs whenever applicable. In addition, the project would not alter land use and would not conflict with the provisions of the Griffith Park Wildlife Management Plan, and no impacts would occur.

2-AT *The commenter states that the tank to be removed was not discussed in the cultural resources section.*

Griffith Park Tank No. 114 is a ground-level water storage tank built in the 1943. The tank is constructed of riveted steel plates with a timber roof cover supported by the tank wall and a center post. The tank sits on a concrete ring foundation. The tank measures 30 feet in height and 35 feet in diameter, with estimated wall thickness is 7/8 inches, and has a capacity of 215,898 gallons. According to LADWP, the tank was taken out of

service as a result of leakage in 2000. The tank is severely corroded and structural damage has occurred to the floor and wall as a result of pitting corrosion. The lower reaches of the tank wall are covered in graffiti. Construction activities and installation of the proposed recycled water storage tank would alter the visual character of the proposed project site; refer to the Cultural Resources Report prepared for the project, which identified the potential impacts to Tank 114. Tank No. 114 does not appear to be individually eligible for listing in the National Register or California Register or eligible as a contributor to Griffith Park, and therefore is not considered a historical resource under CEQA. Tank No. 114 does not appear to qualify as a Los Angeles Historic-Cultural Monument.

2-AU *In response to Comment 2-AU, an editorial change has been made to Section 2.5, Cultural Resources, of the Draft MND as follows:*

**CUL-3:** Preparation of Paleontological Resource Monitoring and Mitigation Plan and Pre-Construction Training. Prior to start of earthmoving activities associated with sensitive fossil-bearing formations located in the southern portion of the project site (includes portions of the proposed cut and cover pipeline, proposed potable pipeline, and proposed and existing water tanks), a qualified paleontologist shall prepare a Paleontological Resource Monitoring and Mitigation Plan (PRMMP) based on and consistent with information provided in *Paleontological Investigation Report of the Los Angeles Department of Water and Power Griffith Park South Water Recycling Project, Los Angeles, California* (Aron and Kelly, 2013). The PRMMP shall outline: sensitive areas within the limits of the project that require paleontological resources monitoring and paleontological monitoring protocols; inadvertent discovery procedures; recovery and salvage measures for potentially significant fossil and microfossil discoveries; laboratory methods; and reporting and curation requirements.

The qualified paleontologist shall also conduct pre-construction worker environmental awareness training prior to construction activities associated with sensitive fossil-bearing formations located in the southern portion of the project site (includes portions of the proposed cut and cover pipeline, proposed potable pipeline, and proposed and existing water tanks). This training shall include information on what to do in case an unanticipated discovery is made by a worker. All construction personnel shall be informed of the possibility of encountering fossils, and instructed to immediately inform the construction foreman if any bones or other potential fossils are unexpectedly unearthed in an area where paleontological monitoring is not required. LADWP shall ensure that construction personnel are made available for and attend the training and shall



retain documentation demonstrating attendance. This training may be conducted in coordination with training required under Mitigation Measure CUL-1.

2-AV *In response to Comment 2-AV, an editorial change has been made to Section 2.5, Cultural Resources, of the Draft MND as follows:*

**CUL-6:** If human remains are encountered, LADWP shall halt work in the vicinity (within 100 feet) of the find and contact the Los Angeles County Coroner in accordance with Public Resources Code (PRC) Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are Native American, the NAHC shall be notified, in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by AB 2641). The NAHC shall designate a Most Likely Descendant (MLD) for the remains per PRC Section 5097.98. Until RAP as the landowner has conferred with the MLD regarding their recommendations, as prescribed in PRC Section 5097.98, taking into account the possibility of multiple human remains, LADWP shall ensure that the immediate vicinity where the Native American human remains are located is not damaged or disturbed by further development activity, according to generally accepted cultural or archaeological standards or practices, ~~until the landowner has discussed and conferred with the MLD regarding their recommendations, as prescribed in PRC Section 5097.98, taking into account the possibility of multiple human remains.~~

2-AW *In response to Comment 2-AW, an editorial change has been made to Section 2.6, Geology and Soils, of the Draft MND as follows:*

**Less than Significant Impact.** ~~The project area is located in the eastern Santa Monica Mountains, which is an east-west trending range. Geological formations in the proposed project area are of Cenozoic age, chiefly Neogene and Quaternary.~~ The proposed project is not located within an Alquist-Priolo Earthquake Fault Zone. The easternmost part of the Santa Monica Mountains is included ~~within~~ Griffith Park, which straddles the southern boundary of the Burbank Quadrangle. The Verdugo Mountains extend across the northeastern third of the Burbank Quadrangle. The nearest fault line is the Hollywood Fault, located approximately 0.6 miles south of the project area. The Hollywood Fault is considered a westward extension of the Raymond fault and is located relatively parallel to the Santa Monica fault. The fault line extends in an east-northeast direction for approximately nine miles through Beverly Hills, West Hollywood, and Hollywood to the

Los Angeles River and I-5 Freeway. The most recent surface rupture along this fault was during the Holocene period (SCEDC, 2013). The proposed project is not located in a City of Los Angeles designated Fault Rupture Study Zone.

2-AX *In response to Comment 2-AX, an editorial change has been made to Section 2.6, Geology and Soils, of the Draft MND as follows:*

The proposed project facilities would be designed and constructed in compliance with the City of Los Angeles Bureau of Engineering Standard Project Specifications. Compliance with applicable regulations would ensure safe and efficient effective project implementation within areas subject to seismic movement. Per standard practice, site-specific geotechnical and geological investigations that focus on these potential hazards are performed as part of project design studies. No habitable structures would be developed, and implementation of the proposed project would not result in an increase in population ~~on the project site~~ subject to seismic standards. Construction activities would be short-term and operational activities would be limited to infrequent maintenance activities. The project designs would be subject to Special Publication 117, "Guidelines for Evaluating and Mitigating Seismic Hazards in California." Conformance with this ~~publication~~ these guidelines in addition to the California Building Code (CBC) requirements would provide for protection from fault rupture. Therefore, the proposed project would not substantially expose people or structures to adverse effects related to ground rupture, and impacts would be less than significant.

2-AY *In response to Comment 2-AY, an editorial change has been made to Section 2.6, Geology and Soils, of the Draft MND as follows:*

The pipelines and recycled water tank would be designed to accommodate site-specific ground motions. Standard geotechnical and structural design criteria required in the CBC would reduce excessive earthquake ~~response~~ effects and minimize potential damage or collapse of the pipelines and recycled water tank. CBC requirements for the pipelines may include flexible pipe joints, shortened pipe lengths, automatic isolation valves, installation of the pipelines inside a protective casing, and shallow or above-ground installation of the pipelines. Any and all of these requirements will be used in the final design of the pipeline. Compliance with the CBC would minimize the potential for damage from strong ground shaking. Therefore, with the incorporation of Mitigation Measure **GEO-1**, the proposed project would result in a less-than-significant impact with mitigation related to groundshaking.

2-AZ *In response to Comment 2-AZ, an editorial change has been made to Section 2.6,*

*Geology and Soils, of the Draft MND as follows:*

**GEO-1:** Prior to the approval of construction plans for the project, including pipelines, pump station, and storage tank, LADWP shall complete a design-level geotechnical investigation. The geotechnical evaluation shall identify soil properties needed for the development of site-specific design criteria. ~~Recommendations made as a results of these investigations will require specific design elements to protect new structures from seismic hazards shall become incorporated into the proposed project final design.~~

2-BA *In response to Comment 2-BA, an editorial change has been made to Section 2.6, Geology and Soils, of the Draft MND as follows:*

a.iii) **Less than Significant Impact.** Liquefaction occurs in saturated and loose soils in areas where the groundwater table is 50 feet or less below ground surface (bgs). During an earthquake, a sudden increase in high core water pressure can cause soils to lose strength and behave as a liquid. As shown on Figure 5, the proposed recycled water storage tank and pump station, and HDD tunneling would not be located within an area identified with the potential for liquefaction area. ~~However, segments of the proposed pipeline up to the pump station, are located in areas designated as having liquefaction potential.~~ The pump station would also be adjacent to this potentially at risk. All infrastructure improvements in the State of California must comply with the seismic design parameters contained in the CBC seismic requirements. Compliance with the CBC standards in the design and construction of the proposed project would reduce potential damage to the new infrastructure from liquefaction. Therefore, the proposed project would not expose people or structures to potential substantial adverse effects related to liquefaction and impacts would be less than significant.

2-BB *In response to Comment 2-BB, an editorial change has been made to Section 2.6, Geology and Soils, of the Draft MND as follows:*

a.iv) **Less than Significant Impact with Mitigation.** Landslides are characterized as deep-seated ground failures, in which a large section of a slope detaches and slides downhill. As shown on Figure 5, the proposed HDD pipeline is partially located within an area that has earthquake induced landslide potential. The proposed recycled water storage tank and pump station and HDD tunneling would not be located directly in landslide potential areas. Construction of the proposed pipeline would be through HDD method underground. As previously stated, the Hollywood Fault is approximately 0.6 miles south of the project site



and the proposed project is located within a seismically active area of California. ~~Nonetheless-So~~, all infrastructure improvements ~~in the State of California~~ must comply with the seismic design parameters contained in the CBC seismic requirements. Compliance with the CBC standards in the design and construction of the proposed project would reduce potential damage to the new infrastructure from landslides. ~~Construction of the pipeline would be located underground and would be constructed and designed in compliance with applicable building codes and standards of the CBC and the Bureau of Engineering.~~

The HDD pipeline alignment would be designed to accommodate landslides. Standard geotechnical and structural design criteria required in the CBC would reduce excessive landslide ~~response effects~~ and minimize potential damage or collapse of the pipeline. Compliance with the CBC would minimize the potential for damage from landslides. With the incorporation of Mitigation Measure **GEO-1**, the proposed project would result in a less-than-significant impact with mitigation related to landslides.

2-BC *In response to Comment 2-BC, an editorial change has been made to Section 2.6, Geology and Soils, of the Draft MND as follows:*

- b) **Less than Significant Impact.** The proposed project would include trenching activities within the 30-foot construction corridor primarily within the existing roadway right-of-ways. The trench would be approximately 2 feet below surface and 3 feet wide. Approximately 1,520 total cubic yards of dirt and topsoil would be excavated and reused as backfill after the pipeline installation. The proposed project would not contribute to soil erosion or loss of topsoil. Construction of the proposed project would require ~~compliance with the Construction General Permit and the~~ preparation of a Stormwater Pollution Prevention Plan (SWPPP) ~~for the construction phase of the proposed project~~ in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges associated with Construction and Land Disturbance Activities (Construction General Permit). The SWPPP shall list all practicable and applicable Best Management Practices (BMPs) in order to reduce soil erosion during construction. Compliance with the NPDES Construction General Permit will ensure that ~~no substantial adverse~~ construction related erosion impacts ~~would occur, and impacts~~ would be less than significant. As described further in Section 3.9 Hydrology and Water Quality, the proposed project would implement BMPs to minimize the occurrence of soil erosion or loss of topsoil. Therefore,



impacts related to soil erosion or the loss of topsoil would be less than significant.

2-BD *In response to Comment 2-BD, an editorial change has been made to Section 2.6, Geology and Soils, of the Draft MND as follows:*

- c) **Less than Significant Impact.** Refer to discussions in responses 32.6(a)(i) through 32.6(a)(iv). The project site is located within an area that is subject to landslides or liquefaction. Thus, impacts from landslides, liquefaction and lateral spreading may occur. Subsidence occurs when a void is located or created underneath the ground surface causing the surface to collapse. Subsidence can be created through tunnels, wells, covered quarries, and caves beneath a surface. In addition, subsidence usually occurs as a result of excessive groundwater pumping or oil extraction. The proposed project would not expose people to seismic-related ground failure because the on-site facilities would be unmanned, and no habitable structures would be built as part of the proposed project. Furthermore, on-site activities would be limited to infrequent maintenance activities. As previously stated, all infrastructure improvements in the State of California must comply with the seismic design parameters contained in the CBC seismic requirements. Compliance with the CBC standards in the design and construction of the proposed project would reduce potential damage to the new infrastructure from on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. As a result, the proposed project would not expose people or structures to potential substantial adverse effects related to unstable soils, and impacts would be less than significant.

In addition, the commenter states to explain how HDD method that creates a tunnel prevents subsidence.

2-BE *In response to Comment 2-BE, an editorial change has been made to Section 2.7, Greenhouse Gases, of the Draft MND as follows:*

- a) **Less than Significant Impact.** Greenhouse gas (GHG) impacts are considered exclusively cumulative impacts. Greenhouse gasses include but are not limited to CO<sub>2</sub>, CO, NO<sub>x</sub>, hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF<sub>6</sub>). Construction-related GHG emissions of ~~GHG~~ would be temporary and would not be an on-going burden to the states GHG inventory. Construction related emissions would total 103 metric tons of carbon dioxide equivalents (CO<sub>2</sub>e) in 2014 and 113 metric tons in 2015. These emissions are less than the 10,000 metric ton per day of CO<sub>2</sub>e threshold established by SCAQMD for industrial projects, were it to apply to construction-related

emissions. There would ~~be not be any~~ sources of operational emissions associated with the proposed pipelines, tank and pump station. Operation of the pump station would require intermittent electrical demand which would be associated with indirect GHG emissions if electricity used were from non-renewable resources. These electricity-related operational GHG emissions would be negligible. Therefore, impacts regarding the generation of GHG emissions would be less than significant.

2-BF *In response to Comment 2-BF, an editorial change has been made to Section 2.7, Greenhouse Gases, of the Draft MND as follows:*

- b) **No Impact.** The proposed project would not markedly increase emissions of GHGs and is not anticipated to conflict with applicable GHG plans, policies, or regulations. State of California Assembly Bill 32 (AB 32) requires that the California Air Resource Board (CARB), in coordination with state agencies, adopt regulations to require the reporting and verification of statewide GHG emissions and monitor and enforce compliance with the program. State of California Senate Bill 375 (SB 375) requires the reduction of GHG emissions by discouraging sprawl development and dependence on car travel. SB 375 assists in the implementation of AB 32 by integrating land use, regional transportation, and housing plannings. ~~The proposed project involves installation of a water pipeline installation that would require minimal and infrequent operational activities.~~ In addition, ~~t~~The proposed project would not generate GHG emissions that would significantly impact the environment, and therefore, The proposed project would not conflict with AB 32 or SB 375 and no impacts would occur.

2-BG *In response to Comment 2-BG, an editorial change has been made to Section 2.8, Hazards and Hazardous Materials, of the Draft MND as follows:*

- h) **Less than Significant Impact.** The project area is located in a Very High Hazard Severity Zone, as identified by the City of Los Angeles Bureau of Engineering. The Griffith Park Fire of 2007 burned over 800 acres, including portions of the project site. However, the proposed project would not expose people or structures to significant injury or death as construction activities would be short-term and operational activities would be limited and infrequent. No habitable structures would be developed for the proposed project. As described in 2.8(b), proper handling, storage, and disposal of fuels and other flammable materials in accordance with local safety requirements would minimize the risk of fires. Therefore, the proposed project is not anticipated to impact people or structures

from wildland fires, and impacts would be less than significant.

2-BH *In response to Comment 2-BH, an editorial change has been made to Section 2.9, Hydrology and Water Quality, of the Draft MND as follows:*

- c) **Less than Significant Impact.** The proposed project would not violate any water quality standards or waste discharge requirements as the proposed project would consist of a new pipeline to convey recycled water, a pump station, and a new recycled water storage tank. Construction-related soil activities would be limited to removal of asphalt/pavement, trenching, stockpiling, and backfilling the trench after installation of the pipe with the excavated soils. The proposed project would prepare a SWPPP in accordance with the NPDES Construction General Permit. The SWPPP is required to list and implement all practicable BMPs in order to protect water quality during construction. Compliance with the NPDES standards through preparation and implementation of a SWPPP would ensure that no substantial adverse impacts would occur. Therefore, impacts would be less than significant.

2-BI and 2-BJ *In response to Comment 2-BI and 2-BJ, an editorial change has been made to Section 2.9, Hydrology and Water Quality, of the Draft MND as follows:*

- c) **Less than Significant Impact.** Construction and operation of the proposed project facilities would be located within Griffith Park and would not alter the existing drainage pattern of the project site. The proposed pipeline would be located underground and would not change the existing drainage pattern throughout its alignment. The recycled water storage tank and pump station would be located on cement pads ~~and adjacent to existing structures~~, which may slightly alter the drainage pattern of that area. However, ~~there are no streams or rivers within the project area and~~ the proposed project is not anticipated to increase runoff, and would adhere to all NPDES regulations and implement BMPs to ensure that construction does not result in erosion impacts. Therefore, the proposed project would not substantially alter the existing drainage pattern of the site or area and substantial erosion of siltation would not occur. Impacts would be less than significant.

2-BK *In response to Comment 2-BK, an editorial change has been made to Section 2.9, Hydrology and Water Quality, of the Draft MND as follows:*

- e) **Less than Significant Impact.** The proposed project would slightly increase impervious surfaces within the project vicinity, by developing concrete cement

pads to support the recycled water tank and pump station. However, the increase of the amount of impervious surfaces would not generate a significant amount of additional runoff, and would not change the course of stormwater runoff. Additionally, construction-related activities involving earth moving during installation of the pipeline would be limited to trenching and backfilling the pipeline alignment. The proposed project would adhere to all regulations and implement BMPs pursuant to the project specific SWPPP ~~which that~~ would ensure that construction activities do not result in polluted runoff. As a result, the proposed project would not create or ~~contribute to polluted~~ increase the amount of runoff water or runoff that would exceed the existing drainage capacity of the project area stormwater drainage systems, and impacts would be less than significant.

2-BL *In response to Comment 2-BL, an editorial change has been made to Section 2.9, Hydrology and Water Quality, of the Draft MND as follows:*

- g) **No Impact.** The proposed project is not located within a 100-year flood hazard area as mapped on the Federal Emergency Management Agency (FEMA) 100-year Flood Insurance Rate Map. In addition, the proposed project does not include housing or other habitable structures that would expose people property to flood hazards. Therefore, no impact would occur.

2-BM *In response to Comment 2-BM, an editorial change has been made to Section 2.9, Hydrology and Water Quality, of the Draft MND as follows:*

- a) **Less than Significant Impact.** The Mulholland Dam and Hollywood Reservoir, owned and operated by LADWP, are located in the Hollywood Hills approximately three miles west of the project site. The Mulholland Dam was built in 1924 and has a capacity of 4,036 acre feet, creating the Hollywood Reservoir. The dam has a height of approximately 195 feet and a crest elevation of 756 feet. The depth of the reservoir is approximately 183 feet. The proposed project is not within the dam inundation area and would not result in construction of any structures that may be affected in the event of catastrophic dam failure. ~~In the event of catastrophic dam failure, proposed project facilities could be reinstalled and constructed.~~ In addition, no levees or dams are located on the project site and no off-site levees or dams would be modified as part of the proposed project. The proposed tank would be maintained on a regular routine to ensure the tank is repaired as necessary reducing the potential for tank failure. As a result, the proposed project would not expose people or structures to a significant risk of



loss as a result of the failure of a levee or dam.

2-BN *In response to Comment 2-BN, an editorial change has been made to Section 2.9, Hydrology and Water Quality, of the Draft MND as follows:*

- j) **No Impact.** Tsunamis are usually caused by displacement of the ocean floor causing large waves and are typically generated by seismic activity. The project site is located approximately 19 miles from the Pacific Ocean, therefore a tsunami hazard is not present for project site. A seiche is a standing wave in an enclosed or partly enclosed body of water. Seiches are normally caused by earthquake activity, and can affect harbors, bays, lakes, rivers, and canals. The Hollywood Reservoir is located approximately three miles west of the project site, which is too far to be impacted by a seiche event at the reservoir. Should an earthquake onsite generate a seiche within the tank, the seiche would remain contained within the tank because there is no opening to allow the water to escape, as in a lake or open reservoir setting. Lastly, mudflow is a mixture of soil and water that runs like a river of mud down a hillside and is usually generated by heavy rainfall. The project site is located adjacent to a hillside that would not expose the project to potential mudflow as the hillside is large vegetated and would slow the flow water should water escape rapidly. The proposed tank would be maintained on a regular routine to ensure the tank is repaired as necessary reducing the potential for tank failure. Therefore, impacts related to seiche, tsunami, or mudflow mudflows would not occur.

2-BO *In response to Comment 2-BO, an editorial change has been made to Section 2.10, Land Use and Planning, of the Draft MND as follows:*

- b) **No impact.** The project site has a land use designation and zoned as of OS (Open Space). The adjoining areas are also designated OS and zoned OS. The proposed water pipeline would be located underground and would not constrain or change the existing land uses within the project area. Construction of the aboveground facilities would not conflict with the existing land use and zoning designations. As a result, no impacts related to conflicts with applicable land use plans, policies, or regulations related to avoiding or mitigating an environmental effects would occur.

2-BP *In response to Comment 2-BP, an editorial change has been made to Section 2.10, Land Use and Planning, of the Draft MND as follows:*

- c) **No Impact.** As discussed in section 32.4(f), the proposed project is not located

within a HCP or NCCP. However, the project area is located within the Griffith Park Wildlife Management Plan area. This plan establishes a baseline in terms of known threats to wildlife and includes BMPs that help assist the Los Angeles Department of Recreation and Parks staff in making land management decisions in Griffith Park and the surrounding open space areas. The proposed project would follow the recommended BMPs whenever applicable. In addition, the project would not alter land use and therefore would not conflict with the plan.

2-BQ *In response to Comment 2-BQ, an editorial change has been made to Section 2.12, Noise, of the Draft MND as follows:*

Construction of the proposed project would include the use of a backhoe to excavate the pipeline trench, a flat bed truck to transport the new pipe material, and accessory vehicles (i.e., pick-up trucks) to take the construction crew to and from the project site. Construction activities would occur 7:00 a.m. to 4:00 p.m., Monday through Friday. There are no sensitive receptors located within 500 meters (1,640 feet) of the project pipeline alignment, pump station or water tank sites. Additionally, construction-related noise would be short-term and would not expose sensitive receptors to noise. Noise generated by truck travel to and from the project area would also be short-term and temporary and would not produce substantial increases in traffic that could result in a significant increase in noise levels. Operation of the proposed water pipeline and equipment would generate minimal noise. The proposed pump station would include an enclosure around the pump which would attenuate operational noise. The onsite facilities would be unmanned with exception of infrequent maintenance activities on the equipment that would not exceed noise standards. As a result, the proposed project would not generate noise levels in excess of adopted standards and noise impacts would be less than significant.

*Response to comment BQ: the commenter states there is no identification or discussion of sensitive receptors in the park to assess noise impacts and to revise the analysis.*

For purposes of this analysis, sensitive land uses such as residences, hospitals and schools were considered, where people may be assumed to be present for many hours over time or have weekend respiratory systems and therefore be at risk for exposure to substantial pollutant concentrations. To address concerns regarding potential sensitive receptors present at the project site during summer of 2014 and 2015, construction activities have been phased to avoid project construction during those times.

2-BR *In response to Comment 2-BR, an editorial change has been made to Section 2.12,*

*Noise, of the Draft MND as follows:*

- d) **Less than Significant Impact.** See responses 12. a) through c) above. Construction noise would be short-term (intermittently over ~~22~~ 36 months) and would result in a temporary increase in ambient noise levels. However, the project area is open space and there are no permanent sensitive receptors located in proximity to the project site that could be affected by the temporary construction noise increase. Thus, construction-related noise is not considered to be substantial. Operation of the pipeline and well equipment would be unmanned with exception of infrequent maintenance events, and would not result in a substantial increase in ambient noise. Therefore, impacts related to substantial temporary or periodic increases in ambient noise levels would be less than significant.

2-BS *In response to Comment 2-BS, an editorial change has been made to Section 2.15, Recreation, of the Draft MND as follows:*

- a) **Less than Significant Impacts.** The proposed project would be located within Griffith Park which is frequently used by visitors. The proposed project would involve the construction and installation of a recycled water pipeline, recycled water storage tank, and a pump station. The proposed project includes the use of HDD method at Fern Canyon Nature Trailhead to avoid impacts to trail users. The proposed project would not increase the use of the park facilities. Operation of the proposed project would not create population growth that would increase the use of the park such that substantial physical deterioration of the facilities would occur. Therefore, less than significant impacts would occur.

LADWP has coordinated extensively with LARAP for implementation of the proposed project. As discussed in Section 2.5 Alternatives Considered but Withdrawn, several alternatives were evaluated with cooperation from both departments before concluding on the proposed project. During discussions for the proposed project, concerns were raised regarding construction impacts during the summers of 2014 and 2015 due to the 2015 Special Olympics World Summer Games will be held partly in Griffith Park. Los Angeles Memorial Coliseum will serve as the main venue, with event locations staged in several other locations in the city, including Griffith Park. Preparation and activities for the event in Griffith Park would take place over the summers of 2014 and 2015. Construction activities have been phased to avoid project construction during the Special Olympics over the summers of 2014 and 2015. Therefore, less than

significant impacts would occur to park operations.

2-BT *Response to comment BT: the commenter states to fix the problem of the cut and cover pipeline project component (in regards to phasing).*

Refer to response to Comment 2-P, 2-Q, 2-R, 2-T, 2-V for response regarding project construction.

2-BU *In response to Comment 2-BU, an editorial change has been made to Section 2.16, Transportation and Traffic, of the Draft MND as follows:*

b) **Less than Significant.** The 2010 Congestion Management Program (CMP) for Los Angeles County addresses the impact of local growth on the regional transportation system. The goal of the CMP is to comply with statutory requirements of the CMP, including monitoring level of service (LOS) on the CMP Highway and Roadway network, measuring frequency and routing of public transit, implementation the Transportation Demand Management and Land Use Analysis Program Ordinances, and helping local jurisdictions meet their responsibilities under the CMP. The proposed construction truck route would utilize I-5 and SR-134, which are CMP highways. The truck route would also utilize Crystal Springs Drive from I-5, Western Heritage Way from SR-134, and Fire Road adjacent to Crystal Springs Drive in Griffith Park roadways. These roadways ~~are~~ are not designated as CMP roadways. Construction related traffic would consist of a maximum of 103 vehicular roundtrips during the tank and pump station construction phase and approximately 145 roundtrip per day generated by construction workers. The temporary addition of ~~470~~ 248 truck trips to the roadways during the ~~HDD pipeline and~~ pump station and tank replacement phases would be minimal. No additional traffic analysis is required as the proposed project does not fit the following criteria requiring further analysis:

- The proposed project will add 50 or more trips during AM or PM weekday peak hours to CMP arterial monitoring intersections
- The proposed project will add 50 or more peak hour trips to CMP arterial segments
- The proposed project will add 150 or more trips to mainline freeways during AM or PM weekday peak hours

Construction-related truck trips would be short-term and minimal and is not



anticipated to permanently impact the existing LOS or conflict with the existing roadway conditions. In addition, construction deliveries and departures would be timed to avoid mainline freeways during AM and PM weekday peak hours. Operational truck trips would be limited and infrequent and would not impact the existing LOS or conflict with the existing roadway conditions. Additionally, the proposed project would be required to prepare a traffic control plan that would be reviewed and approved by the Los Angeles Department of Transportation. Therefore impacts would be less than significant.

2-BV *In response to Comment 2-BV, an editorial change has been made to Section 2.16, Transportation and Traffic, of the Draft MND as follows:*

- d) **No-Less than Significant Impact.** The proposed project would not alter existing roadways nor include any hazardous design features such as sharp curves or dangerous intersections. No incompatible uses such as farm equipment are proposed. As stated in response 2.16 a), construction access to the various parts of the alignment would be via Crystal Springs Drive from I-5, Western Heritage Way from SR-134, and Fire Road adjacent to Crystal Springs Drive in Griffith Park. All construction activities would occur within the 30-foot construction corridor, and no roadway or lane closures are anticipated. Construction-related truck trips would be minimal and short-term and are not anticipated to impact the existing circulation system performance. As a result, traffic impacts to the roadway system from construction would be less than significant. As such, no impacts would occur.

2-BW *In response to Comment 2-BW, an editorial change has been made to Section 2.16, Transportation and Traffic, of the Draft MND as follows:*

- f) **No-Less than Significant Impact.** Segments of the proposed pipeline would be located in proximity to the Fern Canyon Nature Trail, which is used frequently by local residents and visitors as a walking and hiking path. To avoid permanent adverse impacts to the existing Fern Canyon Nature Trail, installation of the pipeline would be completed using the HDD method. This would ensure the nature trail impacts, although short-term, would not adversely impact the trail during construction and operation. Construction activities would be located along portions of Nature Fern Canyon Trail (refer to Figure 3), particularly near the trailhead for the HDD pipeline. However, access will remain unimpeded and use of the trail will continue during construction activities. Construction activities would not conflict with the Griffith Park Master Plan and other policies, plans, or

programs regarding public transit, bicycle, or pedestrian facilities within the project area. At the end of construction, the project area would return to pre-construction conditions, with the exception of the new above ground structures. In addition, the proposed project would not propose any activities that would conflict with policies, plans, or programs support alternative transportation. ~~No~~ Impacts would be less than significant occur.

2-BX *The commenter states if no soil will be hauled off-site then why are there so many haul truck trips reported?*

The truck trips are related to material delivery to the project site for building the project components and not for hauling excavated soils.

2-BY *The commenter states change prehistoric archaeological resources to more general cultural resources.*

This change is not considered necessary as it does not relate to the environmental impact significance conclusion.

2-BZ *The commenter states to please identify the project that is 0.5 miles to the east of the project site.*

The commenter did not provide the necessary for inclusion in the analysis.

2-CA *In response to Comment 2-CA, an editorial change has been made to Section 2.18, Mandatory Findings of Significance, page 64 of the Draft MND as follows:*

**TABLE 4  
 CUMULATIVE PROJECTS LIST**

<b>Project</b>	<b>Location</b>	<b>Land Use</b>
River Supply Conduit Improvement Project Lower Reach	Zoo Drive, north of Griffith Park	Roadway; Park
Riverside Drive Bridge Widening and Rehabilitation Project	Bette Davis picnic area on the northern boundary of Griffith park	Park; Public Facility
Headworks Reservoir Project	6001 West Forest Lawn Drive	Park
North Atwater Non-Motorized Bridge Project	3900 Chevy Chase Dr	Park
LADWP Power Reliability Improvement Project	Along Los Feliz Blvd	Roadway; Commercial

Griffith Park Baseball Fields	Crystal Springs Picnic Area of Griffith Park	Park; Public Facility
<del>LARAP Shakespeare in the Park</del> <del>New Permanent Stage Griffith Park Performing Arts Center</del>	Old Zoo	Park; Public Facility
BOE Interceptor Sewer	Intersection of Crystal Springs Rd and the 5 freeway exit	Roadway; Park
2014/15 Special Olympics Games	Griffith Park	Park; Public Facility

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2-CB *The commenter states the cases for less than significant air quality, noise and traffic impacts have not been made and requests revisions when all comments have been addressed.*

The comments are appreciated and revisions have been applied to this Final MND. The changes made to the Final MND as a result of the comments provided have not resulted in changes to the significance determinations requiring additional mitigation measures. No additional analysis is required to substantiate findings for air quality, noise and traffic less than significant impacts.

2-CC *The commenter states revise the Biological Resource Report for all changes to the project description as required.*

The comments are appreciated and the updates have been applied to this Final MND; the technical reports are not required to be updated with this information.

2-CD *The commenter states revise the Paleontological Report for all changes to the project description as required.*

The comments are appreciated and the updates have been applied to this Final MND; the technical reports are not required to be updated with this information.

2-CE *The commenter states that the air quality appendices need to be included.*

The data emission sheets are provided in Appendix C of this Final MND.

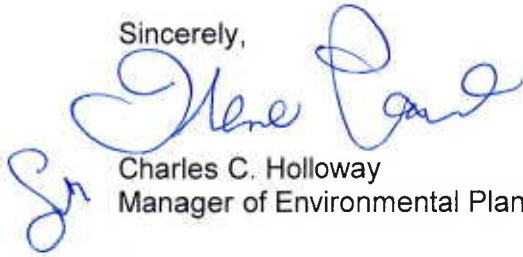
Mr. Paul Davis  
January 22, 2014  
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Adoption of the Mitigated Negative Declaration and consideration of the proposed project by the Board of Water and Power Commissioners (Board) is tentatively scheduled for March 4, 2014 at 11:30 a.m. The meeting location is:

Los Angeles Department of Water and Power  
Room 1555-H, 15<sup>th</sup> Floor  
111 North Hope Street  
Los Angeles, CA 90012

Regular meeting agendas are available to the public at least 72 hours before the Board meets. The Board Agenda may be viewed on the LADWP website at <http://www.ladwp.com/ladwp/cms/ladwp001861.jsp> or the commission office may be contacted at (213) 367-1350. If you have any questions or are in need of additional information, please contact Irene Paul at (213) 367-3509.

Sincerely,



Charles C. Holloway  
Manager of Environmental Planning and Assessment

IP:

c/enclosure : Ms. Irene Paul



Figure 2

Figure 3