Initial Study/Mitigated Negative Declaration

Stormwater Capture Parks Program

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

January 2021

CEQA Initial Study and Mitigated Negative Declaration

Stormwater Capture Parks Program

January 2021

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

Technical Assistance Provided by
ESA
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COUNTY CLERK'S USE

CITY CLERK'S USE

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED
MITIGATED NEGATIVE DECLARATION
(Article I, City CEQA Guidelines)

LEAD CITY AGENCY:	**COUNCIL DISTRICT**
Los Angeles Department of Water and Power (LADWP) 111 North Hope Street, Room 1044 Los Angeles, CA 90012	CD No. 2, 6, and 7
PROJECT TITLE: Stormwater Capture Parks Program	**CASE NO.**

PROJECT DESCRIPTION: The Program would include construction of stormwater capture facilities at nine City-owned parks to help capture surface flow and divert stormwater runoff from the Tujunga Wash Central Branch storm drain to recharge the groundwater basin.

PROJECT LOCATION: All nine parks would be located in the east San Fernando Valley along State Route (SR) 170; these parks include: David M. Gonzales Recreation Center, Fernangeles Park, Strathern Park North, Whitsett Fields Park North, Valley Plaza Park North, Valley Plaza Park South, Alexandria Park, North Hollywood Park, and Valley Village Park.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY

FINDING: See attached Initial Study for Mitigation Measures Imposed

NAME OF PERSON PREPARING THIS FORM:	**TITLE:**	**PHONE:**
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ADDRESS: 111 N. Hope Street, Room 1044 Los Angeles, CA 90012	**SIGNATURE (Official)** Martin J. Parker for Charles C. Holloway, Manager of Environmental Planning and Assessment	**DATE** 12/30/20

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Project Description

1.1 Introduction

The Los Angeles Department of Water and Power (LADWP), Department of Public Works (Bureau of Engineering [BOE]), Los Angeles Sanitation and Environment (LASAN), and City of Los Angeles Department of Recreation and Parks (RAP), collectively referred to herein as the City, propose to implement the Stormwater Capture Parks Program (Program). The Program would include construction of stormwater capture facilities at nine City-owned parks to help capture surface flow and divert stormwater runoff from the Tujunga Wash Central Branch storm drain to recharge the San Fernando Groundwater Basin. All nine parks are located in the east San Fernando Valley along State Route (SR) 170 (**Figure 1-1**); these parks include: David M. Gonzales Recreation Center; Fernangeles Park; Strathern Park North; Whitsett Fields Park North; Valley Plaza Park North; Valley Plaza Park South; Alexandria Park; North Hollywood Park; and Valley Village Park (**Figure 1-2**).

1.2 Project Background

The proposed Program would meet the established goals identified in the existing LADWP Stormwater Capture Master Plan (SCMP), 2015 Urban Water Management Plan (UWMP), Upper Los Angeles River Enhancement Watershed Management Program (EWMP), and Mayor Eric Garcetti's City of Los Angeles's Green New Deal, Sustainable City pLAn (L.A.'s Green New Deal). In addition to meeting the goals set out in these planning documents, the Program would improve the parks, improve recreation opportunities to the public, and provide environmental and educational opportunities to local residents and students.

LADWP Stormwater Capture Master Plan

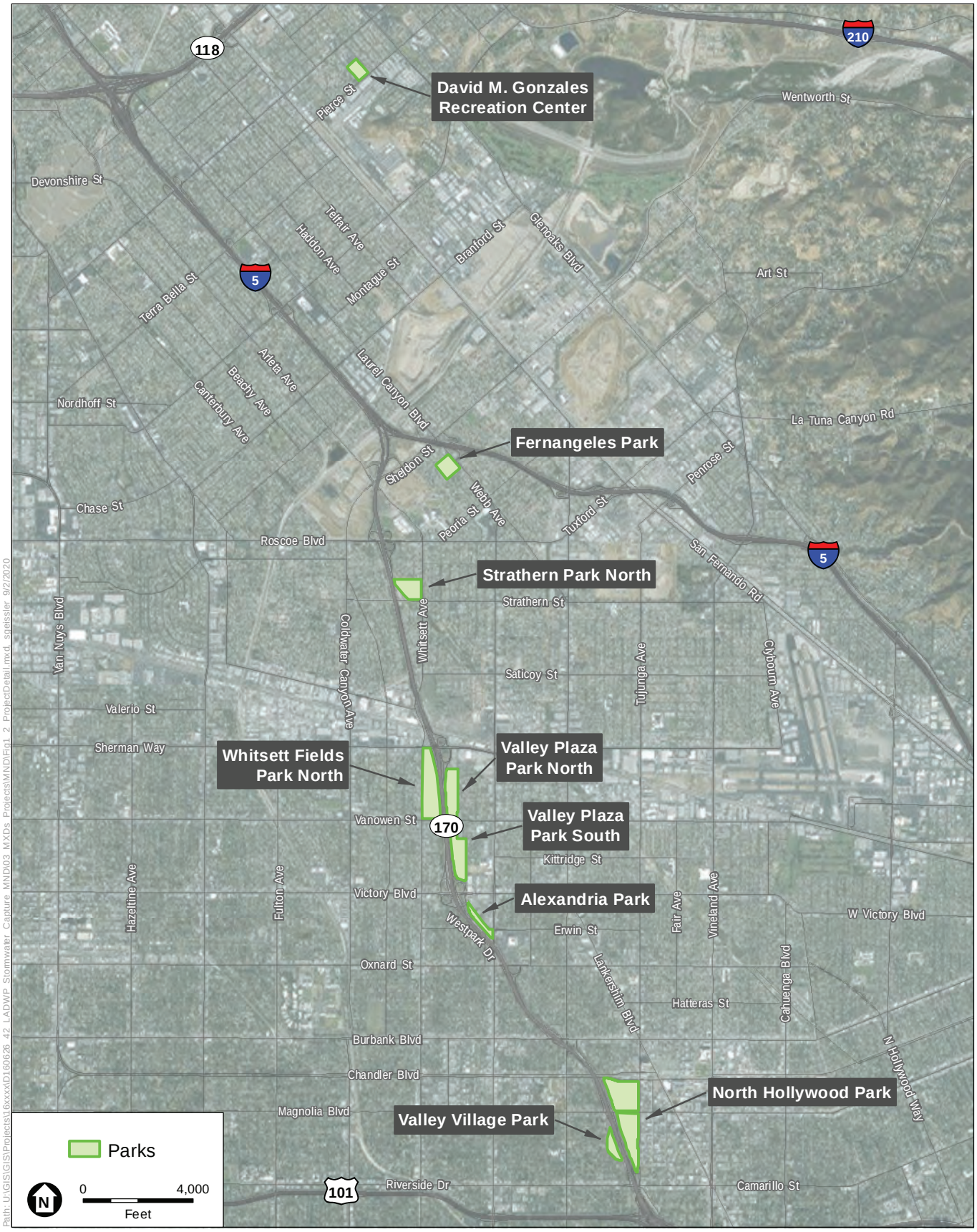
The SCMP was established to increase opportunities for stormwater capture within the City of Los Angeles. Currently, stormwater runoff that exceeds the existing stormwater infrastructure's conveyance capacity is bypassed and flows to the Pacific Ocean via the City of Los Angeles's rivers and storm drains. By increasing stormwater capture capacity, more water would be stored in local groundwater basins, such as the San Fernando Groundwater Basin. Through the planning process, and with input from the community, LADWP has identified opportunities to increase stormwater capture in Los Angeles as part of its effort to increase the local water supply and reduce the dependence on imported water for the City of Los Angeles. The SCMP evaluated the existing stormwater capture facilities and projects, quantified the City's stormwater capture potential, developed feasible stormwater capture alternatives, and provided potential strategies to increase stormwater capture. The proposed Program has been developed by the City to directly support the goals of the SCMP.

SOURCE: ESRI

Stormwater Capture Parks Program

Figure 1-1
Regional Location

ESA



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SOURCE: ESRI.

Stormwater Capture Parks Program

Figure 1-2
Project Location

ESA

2015 Urban Water Management Plan

The Program supports the goals of the UWMP. The purpose of the UWMP is to provide advanced planning for identifying reliable water sources in the future. Specifically, the UWMP forecasts future water demands and water supplies under average and dry-year conditions; identifies future water supply projects, such as recycled water projects; provides a summary of water conservation best management practices (BMPs); and provides a single- and multi-dry-year management strategy. The UWMP includes the basic policy principles that guide LADWP's decision-making process to secure a sustainable water supply for Los Angeles. Currently, LADWP is in the development phase for the 2020 UWMP update, which will build upon the goals and progress made in the 2015 UWMP. The proposed Program would increase the ability of the City to capture and store water, which would benefit the City as water demand is projected to increase in the coming years.

City of Los Angeles' Green New Deal

L.A.'s Green New Deal is Mayor Eric Garcetti's plan to increase environmentally conscious actions and projects within the City while supporting the local economy. The plan is divided into several key goals promoting environmental justice, renewable energy, local water, clean and healthy buildings, housing and development, mobility and public transportation, zero-emission vehicles, industrial emissions and air quality monitoring, waste and resource recovery, food systems, urban ecosystems and resilience, and green jobs. The local water chapter provides targets set for the City to accomplish, including sourcing 70 percent of the City's water locally by capturing 150,000 acre-feet per year (AFY) of stormwater by 2035 and building at least 20 new multi-benefit stormwater capture projects by 2025; 100 by 2035; and 200 by 2050. The Program would support L.A.'s Green New Deal directly as a stormwater capture project across nine different parks in the City.

The Program has been developed because the City recognized a need for enhanced stormwater capture in Los Angeles through the three planning documents discussed above. The Program aims to not only enhance stormwater capture, but also to provide secondary benefits, including improved recreational facilities in the City.

The Program would improve water quality in the Program's tributary area of 5,690 acres by reducing the amount of pollutants such as trash, bacteria, and metals that enter the Los Angeles River. The Program would also offer active and passive open space enhancement.

Enhanced Watershed Management Plan

The Regional Water Quality Control Board approved the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit No. R4-2012-0175 (MS4 Permit) in December 28, 2012, covering stormwater discharges in Los Angeles County. The purpose of the MS4 Permit is to ensure the MS4s in Los Angeles County are not causing or contributing to exceedances of water quality objectives set to protect the beneficial uses in the receiving waters. As an MS4 co-permittee, the City of Los Angeles prepared an EWMP for the Upper Los Angeles River Area (ULARA) that includes plans and

strategies to reduce urban runoff through enhanced stormwater capture. The proposed Program is intended to comply with the EWMP objectives of increased stormwater capture through establishment of centralized stormwater retention facilities consistent with the ULARA EWMP Reasonable Assurance Analysis, which was a rigorous modeling effort to demonstrate that the EWMP was capable of meeting water quality requirements.

1.3 Project Location

All nine parks are located within the upper Tujunga Wash Watershed, which lies above the San Fernando Valley Groundwater Basin. Below are descriptions of each park location (Figure 1-2).

David M. Gonzales Recreation Center

The David M. Gonzales Recreation Center is located south of the Interstate 210 (I-210) freeway, east of the 118 freeway, and north of Interstate 5 (I-5) freeway in the Pacoima neighborhood of the City. It is bordered by Pacoima Elementary School to the northwest, Herrick Avenue to the northeast, Pierce Avenue to the southeast, and Norris Avenue to the southwest.

Fernangeles Park

Fernangeles Park is located south of the I-5 freeway and SR 170 freeway interchange in the Sun Valley neighborhood of the City. It is bordered by Allegheny Street to the west, Laurel Canyon Boulevard to the north, Wicks Street to the east, and Remick Avenue to the south.

Strathern Park North

Strathern Park North is located south of the I-5 freeway and SR 170 freeway interchange in the Sun Valley neighborhood of the City. It is bordered by Whitsett Avenue to the east, Strathern Street to the south, SR 170 to the west, and residential homes to the north.

Whitsett Fields Park North

Whitsett Fields Park North is located south of the I-5 freeway and west of SR 170 freeway in the Valley Glen neighborhood of the City. It is bordered by Whitsett Avenue to the west, Sherman Way to the north, SR 170 to the east, and Vanowen Street to the south.

Valley Plaza Park North

Valley Plaza Park North is located south of the I-5 freeway and SR 170 freeway interchange in the North Hollywood neighborhood of the City. It is bordered by SR 170 to the west, an apartment complex to the north, Laurelgrove Avenue to the east, and Vanowen Street to the south.

Valley Plaza Park South

Valley Plaza Park South is located south of the I-5 freeway and SR 170 freeway interchange in the North Hollywood neighborhood of the City. It is bordered by SR 170 to the west,

Vanowen Street to the north, Laurelgrove Avenue and St. Claire Avenue to the east, and Victory Boulevard to the south.

Alexandria Park

Alexandria Park is located south of the I-5 freeway and SR 170 freeway interchange in the North Hollywood neighborhood of the City. It is bordered by SR 170 to the west and south, Laurel Canyon Boulevard to the east, and commercial buildings and parking lots to the north.

North Hollywood Park

North Hollywood Park is located north of the US 101 freeway and SR 170 freeway interchange in the North Hollywood neighborhood of the City. It is bordered by Tujunga Avenue to the east, Chandler Boulevard to the north, and SR 170 to the west and south.

Valley Village Park

Valley Village Park is located north of the SR 170 and US 101 freeway interchange in the Valley Village neighborhood of the City. It is bordered by Westpark Drive to the west and SR 170 to the east.

1.4 Project Objectives

The purpose of the Program is to meet the goals of LADWP's SCMP, UWMP, EWMP, and L.A.'s Green New Deal by capturing and infiltrating local stormwater runoff and implementing BMPs to meet the following objectives:

- Recharge the groundwater basin.
- Alleviate localized flooding in the area.
- Improve water quality of stormwater runoff.
- Achieve peak flow attenuation at downstream water bodies (e.g., Los Angeles River).

1.5 Project Description

The proposed Program would capture stormwater surface flows in the Program area within the City, diverting the runoff from the Central Branch Tujunga Wash to recharge the San Fernando Groundwater Basin. Underground infiltration galleries would be constructed within open space portions of each of the nine parks, and other appurtenances would be installed to connect to and manage flow from existing storm drains. The impact areas within each park would be fully restored to maintain their recreational uses following installation. No existing park buildings would be impacted or otherwise modified during construction, with the exception of the addition of the battery energy-storage system to the David M. Gonzales Recreation Center's electrical room. Additional improvements to park amenities would also be implemented as part of the Program; these improvements are still under preliminary design and are further described under each park description. The Program covers a tributary area of 5,690 acres with an estimated yield

of 3,010 AFY and would improve water quality by reducing total maximum daily load pollutants such as trash, bacteria, and heavy metals that enter the Los Angeles River.

At each park project site, an underground infiltration gallery and/or dry wells would be constructed. A similar infiltration gallery design is included as **Figure 1-3**. These would be approximately 12 feet high with 11 feet of storage. Coverage areas for each park project are detailed below. A hydrodynamic separator (HDS) unit would be installed at each park facility. HDS units would be placed upstream to help separate and trap trash, debris, sediment, oils, and grease from stormwater runoff. The HDS units would provide easy access for maintenance and would alleviate clogging within the infiltration gallery. Maintenance holes would be installed where appropriate for inspection and maintenance. New paved access roads would be constructed at each park project site, or existing roads would be used, to allow access to the maintenance holes. The location for each of the access roads would be determined during final design of the individual park projects, and would be incorporated into the recreational design of the facility as feasible. Flow-measuring devices at project inlets would be installed to determine stormwater capture benefits. Diversion pipes may travel along city streets surrounding the park project sites. Underground utilities may need to be relocated during construction of the proposed Program. Educational signage would be installed at each park project site to provide for community engagement.

Above the infiltration galleries or dry wells, each park would be graded and revegetated with grass, or other park improvements would be made to maintain recreational use. Park enhancements and improvements to further benefit the park users and local residents are being considered and would be determined with input from RAP and the community. LADWP has been coordinating the design effort with RAP and has engaged the local community through several community meetings to solicit input. Park project site landscape and enhancement plans are currently in the conceptual stages of design. Figures 1-4 through 1-12 depict the preliminary design at each park. These designs are subject to change and will undergo updates until final design is determined.

Below are descriptions of improvements proposed at each individual park project site.

David M. Gonzales Recreation Center

Program activities at the David M. Gonzales Recreation Center would include installation of one or two underground infiltration galleries covering approximately 114,000 square feet in the center of the park to capture and infiltrate stormwater (**Figure 1-13**). The infiltration gallery would overlap open space and two existing ball fields, including the infield and outfield of one baseball field and one softball field. The backstops and other features of the ball fields would remain and/or be incorporated into the final ball field construction. Construction of the underground infiltration gallery would include installation of a storm drain diversion, desilting basins, a conveyance pipe, an HDS unit, infiltration chambers, a flow-measuring device, and educational signage. The proposed storm drain diversion and pipe would travel across Pierce Street, Norris Street, and Harrick Avenue. Removal of existing pavement and relocation of existing subsurface utilities along Van Nuys Boulevard, Norris Avenue, and Pierce Street would be required.

Sun Valley Park Infiltration Galleries

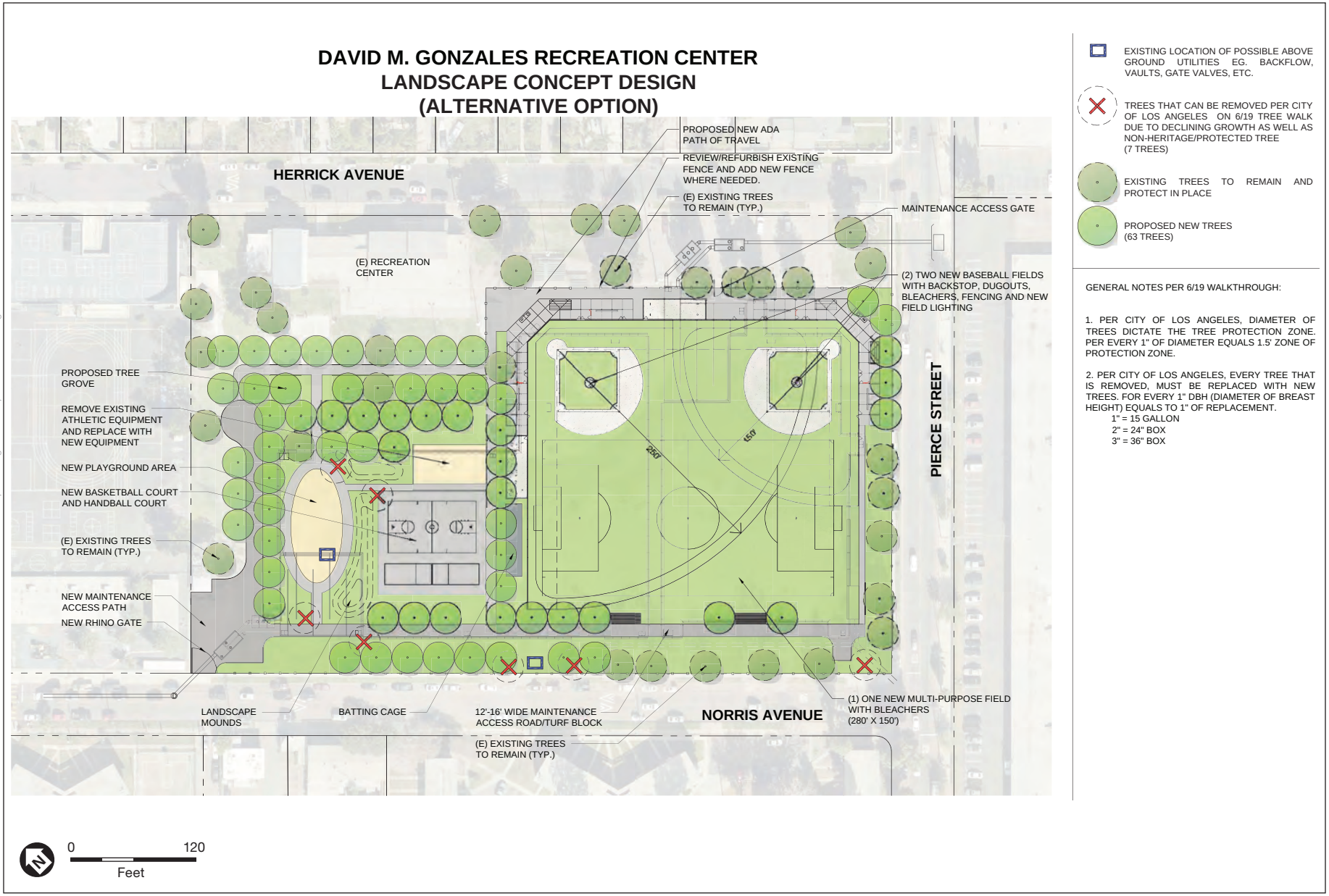
Garvanza Park Best Management Practices Project Infiltration Galleries

SOURCE: North Hollywood Park Stormwater Capture Project-Conceptual Study Report

Stormwater Capture Parks Program

Figure 1-3
Infiltration Gallery Examples

ESA



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SOURCE: City of Los Angeles, 2020

Stormwater Capture Parks Program

Figure 1-4
David M. Gonzales Recreation Center Conceptual Landscape Design

ESA

TREES THAT CAN BE REMOVED PER CITY OF LOS ANGELES ON 6/19 TREE WALK DUE TO DECLINING GROWTH AS WELL AS NON-HERITAGE/PROTECTED TREE

LOCATION OF POSSIBLE ABOVE GROUND UTILITIES EG. BACKFLOW, VAULTS, GATE VALVES, ETC.

GENERAL NOTES PER 6/19 WALKTHROUGH:

1. PER CITY OF LOS ANGELES, DIAMETER OF TREES DICTATE THE TREE PROTECTION ZONE. PER EVERY 1" OF DIAMETER EQUALS 1.5' ZONE OF PROTECTION ZONE.

2. PER CITY OF LOS ANGELES, EVERY TREE THAT IS REMOVED, MUST BE REPLACED WITH NEW TREES. FOR EVERY 1" DBH (DIAMETER OF BREAST HEIGHT) EQUALS TO 1" OF REPLACEMENT.
   1" = 15 GALLON
   2" = 24" BOX
   3" = 36" BOX

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Feet

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SOURCE: City of Los Angeles, 2020

Stormwater Capture Parks Program

Figure 1-5
Fernangeles Park Conceptual Landscape Design

ESA

TREES THAT CAN BE REMOVED PER CITY OF LOS ANGELES ON 6/19 TREE WALK DUE TO DECLINING GROWTH AS WELL AS NON-HERITAGE/PROTECTED TREE

LOCATION OF POSSIBLE ABOVE GROUND UTILITIES EG. BACKFLOW, VAULTS, GATE VALVES, ETC.

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SOURCE: City of Los Angeles, 2020

Stormwater Capture Parks Program

Figure 1-6
Strathern Park North Conceptual Landscape Design

ESA

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SOURCE: Carollo Engineers, 2020

Stormwater Capture Parks Program

Figure 1-7
Whitsett Fields Park North Landscape Design

ESA

SOURCE: Dake Luna, 2020

Stormwater Capture Parks Program

Figure 1-8
Valley Plaza Park North Landscape Design

ESA

SOURCE: Dake Luna, 2020

Stormwater Capture Parks Program

Figure1-9
Valley Plaza Park South Conceptual Landscape Design

ESA

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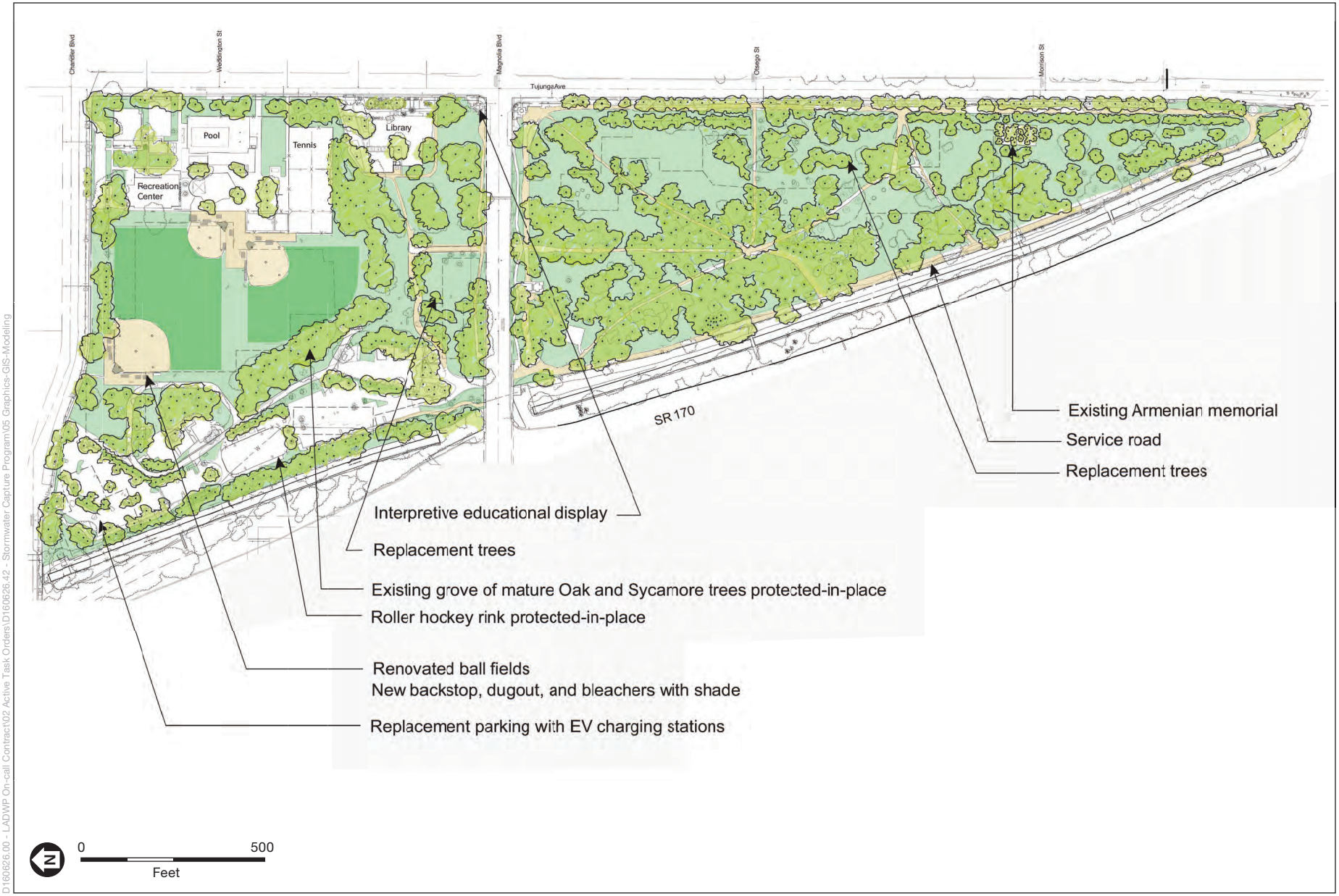
SOURCE: Dake Luna, 2020

Stormwater Capture Parks Program

Figure1-10
Alexandria Park Conceptual Landscape Design

ESA



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SOURCE: Tetra Tech, 2020

Stormwater Capture Parks Program

Figure 1-11
North Hollywood Park Landscape Design

ESA

SOURCE: Carollo Engineers, 2020

Stormwater Capture Parks Program

Figure 1-12
Valley Village Park Landscape Design

ESA

SOURCE: Nearmap, 2020; County of Los Angeles

Stormwater Capture Parks Program

Figure 1-13
David M. Gonzales Recreation Center

ESA

The David M. Gonzales Recreation Center would receive flows from the surrounding neighborhood, with a total area of approximately 760 acres. Flows from this drainage area would converge to a 6-foot-diameter storm pipe, where water would be diverted into the infiltration gallery.

The underground infiltration galleries would have the ability to store up to 1,250,000 cubic feet of water and would require excavation to a depth of 29 feet below ground surface (bgs).

Operations and maintenance vehicles would access the site through existing driveways. The existing driveway off Norris Avenue is an access point for RAP maintenance and LASAN solid waste pickup vehicles for maintenance activities. A 16-foot-wide access road would be constructed along the perimeter of the park alongside Norris Avenue and Pierce Street to provide a dedicated driving lane for service and maintenance vehicles to access the proposed facilities.

The proposed park project would include the addition of green infrastructure elements such as landscape areas with California native drought-tolerant plant material, an irrigation system, and stormwater capture elements. Landscaping design would consist of the replacement of two ball fields, one refurbished multi-purpose field, and one new synthetic turf soccer field. All fields would have bleachers with shade trees adjacent when possible. The park project would also include replacement of sports lighting for the two baseball diamonds and soccer field located on top of the proposed stormwater capture facilities. Figure 1-4 shows a conceptual park improvement site plan. Tree removal may be required.

Some recreational facilities would be closed during construction. Closures and recreational restrictions would be determined once the design is finalized.

The proposed project would include construction of a new carport system at the northern parking lot along Herrick Avenue. New solar photovoltaic panels would be installed along the top of the new carport, and up to four new electric vehicle supply equipment stations would be added to the parking area. In addition, the project would require a battery energy-storage system, which would be located within the David M. Gonzales Recreation Center's electrical room. A new conduit would be constructed, connecting the new carport to the battery energy-storage system. The solar panels would be expected to provide approximately 35-kilowatt DC of capacity. The battery energy-storage system would provide energy to critical loads during emergency blackouts.

Electrical service upgrades are proposed at the park project site to power the new stormwater capture facilities, including upgrading to a 3-phase 480-volt electrical service.

Fernangeles Park

Program activities at Fernangeles Park would include installation of one infiltration gallery covering approximately 72,000 square feet in the east central portion of the park to capture and infiltrate stormwater (**Figure 1-14**). The infiltration gallery would overlap the open space of two existing ball fields, including the infield and outfield of one baseball field and one softball field. The backstops and other features of the ball fields would remain and/or be incorporated within the final ball field construction. Construction of the underground infiltration gallery would include installation of three catch basin inlets, a desilting basin, conveyance pipes, a cross gutter, two HDS units, flow-measuring devices, educational signage, and a new maintenance parking lot on the southwest corner of the park, and would be accessible from Remick Avenue.

SOURCE: Nearmap, 2020; County of Los Angeles

Stormwater Capture Parks Program

Figure 1-14
Fernangeles Park

ESA

Additional Program activities would include redesign of Allegheny Street between Laurel Canyon Boulevard and Remick Avenue, immediately north of Fernangeles Park to capture storm runoff. The redesign would include green street elements as well as conveyance piping to alleviate localized flooding associated with the California Department of Transportation (Caltrans) pump station off the I-5 freeway at Sheldon Street. A catch basin would be installed northwest of Allegheny Street, immediately north of the park, southwest of the intersection at Morehart Avenue. A cross gutter along Allegheny Street, crossing Morehart Avenue, would direct surface runoff to the catch basin. A proposed diversion structure and pipe would be installed across Allegheny Street and Laurel Canyon Boulevard, and at Wicks Street.

The underground infiltration gallery would have the ability to store up to 703,000 cubic feet of water. Fernangeles Park would receive flows from the surrounding neighborhood, with a total tributary area of approximately 320 acres. The infiltration gallery would require excavation to a depth of 18 feet bgs.

Maintenance vehicles would access Fernangeles Park facilities from the west side of the park using an existing parking lot on Allegheny Street. A 16-foot driveway to a new parking lot would be constructed at the southeast corner of the park. The proposed driveway and parking lot would provide a dedicated access road and laydown area for service and maintenance vehicles to access park facilities from Remick Avenue.

Proposed park improvements include replacing two ball fields and adding a new trail system, bioswales, and an enhanced picnic area. Landscaping proposed at the park would include planting, irrigation, and educational signage. The proposed park project would also include replacement of sports lighting for the two ball fields within the project impact areas. Figure 1-5 shows a conceptual park improvement site plan.

Some recreational facilities would be closed during construction. Closures and recreational restrictions would be determined once the design is finalized.

Electrical service upgrades would be required (upgrading to a 3-phase 480-volt electrical service).

Strathern Park North

Program activities at Strathern Park North would include installation of one underground infiltration gallery covering approximately 61,700 square feet in the eastern portion of the park within a fenced, undeveloped field to capture and infiltrate stormwater (**Figure 1-15**). Construction of the underground infiltration gallery would include installation of a diversion structure, an infiltration gallery, a desilting basin, a bypass vault, conveyance pipes, an overflow channel, an HDS unit, flow-measuring devices, and educational signage. A diversion structure and pipe would be installed—at the northwest corner of the park, and an additional diversion structure would be installed at the northern park boundary at the end of Potter Avenue. The diversion structure would divert water from the storm pipe to a temporary retention chamber, from where gravity flow will move the water from the retention chamber to a pipe that would convey the stormwater to the inlet of the underground infiltration gallery.

SOURCE: Nearmap, 2020; County of Los Angeles

Stormwater Capture Parks Program

Figure 1-15
Strathern Park

ESA

The underground infiltration gallery would have the ability to potentially store up to 968,000 cubic feet of water. Strathern Park North would receive flows from the surrounding neighborhood, with a total area of approximately 450 acres. Runoff from Tributary Area 1 converges to a 45-inch storm pipe and then to a 36-inch reinforced concrete pipe (RCP), where water would be diverted into the infiltration gallery. Runoff from Tributary Area 2 runs south along Potter Avenue. A catch basin would direct flows to an 18-inch RCP and subsequently into the BMP. The infiltration gallery would require excavation to a depth of 17 feet bgs.

Some recreational facilities would be closed during construction. Closures and recreational restrictions would be determined once the design is finalized.

Maintenance vehicles would access the park from the south via Strathern Street, using an existing gate that provides entry to the LADWP Power System right-of-way along the western boundary of the park. The park project would include a new 35-vehicle parking lot and access to the new ball fields via the LADWP Power System right-of-way. Landscaping at the park may include an overflow lawn area for team gatherings, landscape screening for neighborhood properties, and trees for shade. Proposed park improvements could include one new regulation-size ball field with a batting cage and one new junior-size ball field. Each ball field would be located in an undeveloped back lot of the park site, and would include a backstop, dugouts, bleachers, fencing, and field lighting. Figure 1-6 shows a conceptual park improvement site plan.

Electrical service upgrades would be required (upgrading to a 3-phase 480-volt electrical service).

Whitsett Fields Park North

Program activities at Whitsett Fields Park North would include installation of one underground infiltration gallery covering approximately 39,700 square feet in the central portion of the park to capture and infiltrate stormwater (**Figure 1-16**). The infiltration gallery footprint would be located in an open space area landscaped with grass within two ball fields. Construction of the underground infiltration gallery would include installation of a diversion structure, a conveyance pipe, two HDS units, a flow-measuring device, and educational signage. The conveyance pipe would be installed along Whitsett Avenue and Raymer Street for approximately 0.2 miles, ending just south of the train tracks. The diversion structure and HDS units would be installed along Raymer Street. The diversion structure would divert stormwater from the existing storm pipe and convey the stormwater to the inlet of the underground infiltration gallery.

The underground infiltration gallery would have the ability to store up to 436,000 cubic feet of water. The park would receive flows from the surrounding neighborhood, with a total area of approximately 305 acres. Flows from this drainage area converge to a 78-inch-diameter RCP, where water would be diverted into the infiltration gallery. The infiltration gallery would require excavation to a depth of 25 feet bgs.

Some recreational facilities would be closed during construction. Closures and recreational restrictions would be determined once the design is finalized.

SOURCE: Nearmap, 2020; County of Los Angeles

Stormwater Capture Parks Program

Figure 1-16
Whitsett Fields Park North

ESA

Park improvements would include enhanced ball fields with new field lighting, dugouts, bleachers, batting cages, hydration stations, trash receptacles, landscaping, native planting, and additional tree replacement planting. A new concrete access path would be constructed to allow for maintenance vehicle access to the proposed project facilities. The new path would be similar to existing paths at the park. Shade trees would be placed along the walking paths and buffer planting around the park would consist mostly of native plants. Figure 1-7 shows a conceptual park improvement site plan.

Electrical service upgrades would be required (upgrading to a 3-phase 480-volt electrical service).

Valley Plaza Park North

Program activities at Valley Plaza Park North would include installation of two infiltration galleries, with a maximum combined area of approximately 87,200 square feet to capture and infiltrate stormwater (**Figure 1-17**). At the maximum extent, the infiltration galleries would be located in the southern and central portions of Valley Plaza Park North within open space areas landscaped with grass, and trees. Construction of the underground infiltration galleries would include installation of one diversion structure, piping, one pump station with a flow meter, an HDS unit, and educational signage. Program activities at Valley Plaza Park North would include installation of up to three infiltration galleries, with a maximum combined area of approximately 4 acres to capture and infiltrate stormwater (**Figure 1-17**). At the maximum extent, the infiltration galleries and would be located in the southern, central, and northern portions of Valley Plaza Park North within open space areas landscaped with irrigated turf and trees.

The diversion structure would divert water from the existing Los Angeles County Flood Control District channel, which is a 12-foot-wide by 10.5-foot-high reinforced concrete box culvert, to a vault with a trash screen, and then to an HDS unit to serve as pre-treatment. From there, flow would continue to a wet-well pump station. Flow would be pumped to a sedimentation basin prior to continuation to the infiltration galleries. The infiltration galleries would be connected by an equalization pipe to promote flow, storage, and infiltration throughout the system.

The total tributary area to the Flood Control District reinforced concrete box culvert is approximately 920 acres. The underground infiltration galleries would have the ability to store up to 958,320 cubic feet of water. Infiltration gallery installation would require excavation to a depth of approximately 26 feet bgs.

Some recreational facilities would be closed during construction. Closures and recreational restrictions would be determined once the design is finalized.

An all-weather access road would be constructed within the southern and central areas of the park to allow operation and maintenance vehicles to service the proposed stormwater capture facilities. The access road would be constructed south of the existing east- to west-trending asphalt concrete walking path (continuing to pedestrian bridge) that bisects the property, and would extend from Laurelgrove Avenue to the western boundary of the park.

SOURCE: Nearmap, 2020; County of Los Angeles

Stormwater Capture Parks Program

Figure 1-17
Valley Plaza Park North

ESA

Passive grassy areas and outdoor fitness/equipment stations in the northern park area would be replaced. Other park improvements would include pedestrian pavements, new trees for canopy and screening of the freeway, irrigation improvements, and lighting. Figure 1-8 shows a conceptual park improvement site plan.

Valley Plaza Park South

Program activities at Valley Plaza Park South would include installation of one infiltration gallery covering approximately 39,900 square feet to capture and infiltrate stormwater (**Figure 1-18**). The infiltration gallery footprint would be located in the southern portion of the park in an open space area landscaped with irrigated turf grass. Construction of the underground infiltration galleries would include installation of a diversion structure, pipes, an HDS unit, a flow-measuring device, and educational signage.

A grated drop inlet at the bottom of the channel or a side inlet diversion would divert water from the storm channel to the HDS unit, then to the inlet of the underground infiltration gallery. In addition, an inflatable rubber dam that inflates to approximately 2 to 4 feet tall and matches the width of the channel may be added to impede flows and divert stormwater into the drop inlet. When deflated, the rubber dam would be flush with the channel bottom so as not to reduce the hydraulic capacity of the channel. An HDS unit would be placed upstream of the infiltration gallery to help separate and trap trash, debris, sediment, oils, and grease from stormwater runoff.

The underground infiltration gallery would have the ability to store up to 479,000 cubic feet of water. The park would receive flows from the surrounding neighborhood, with a total area of approximately 213 acres. Flows from this drainage area would converge from the 14-foot by 6.5-foot concrete channel to an RCP, where water would be diverted into the infiltration galleries. The infiltration gallery would require excavation to a depth of 26 feet bgs.

Some recreational facilities would be closed during construction. Closures and recreational restrictions would be determined once the design is finalized.

Operation and maintenance vehicles would access the proposed stormwater capture facilities from St. Claire Avenue. A concrete service access and walkway would be constructed.

Ball fields, tennis courts, and existing structures would be preserved in place. The parking lot would be reconstructed with electrical vehicle charging stations and permeable pavement. The passive park spaces would be replaced in kind and would include any changes to meet current standards. The existing pattern of lighting in the park would be preserved and any existing lighting that is disturbed during construction would be replaced. Replacement site furniture, such as trash receptacles and benches, would be installed where construction of new underground infiltration galleries and conduits disturb surface features. New trees would be planted to provide canopy cover for park uses and to screen the adjacent freeway from park uses. Other improvements at the park would include irrigation retrofits, new plants, and new pedestrian pavements. Figure 1-9 shows a conceptual park improvement site plan.

SOURCE: Nearmap, 2020; County of Los Angeles

Stormwater Capture Parks Program

Figure 1-18
Valley Plaza Park South

ESA

Electrical service upgrades would be required (upgrading to a 3-phase 480-volt electrical service with a step-down transformer and 120/240-volt subpanel to serve the instrumentation and smaller loads).

Alexandria Park

Program activities at Alexandria Pardk would include installation of up to three infiltration galleries with a combined area of approximately 22,200 square feet to capture and infiltrate stormwater (**Figure 1-19**). The infiltration gallery footprint would be located in an open space area landscaped with irrigated turf grass. Construction of the underground infiltration gallery would include installation of a diversion structure, a storm pipe, an HDS unit, a pump station, a flow-measuring device, and educational signage.

A grated drop inlet at the bottom of the channel or side inlet diversion would divert water from the storm channel to the HDS unit, then to the inlet of the underground infiltration gallery. In addition, an inflatable rubber dam that inflates to approximately 2 to 4 feet tall and matches the width of the channel may be added to impede flows and divert stormwater into the drop inlet. When deflated, the rubber dam would be flush with the channel bottom so as not to reduce the hydraulic capacity of the channel. An HDS unit would be added to help separate and trap trash, debris, sediment, oils, and grease from stormwater runoff. A pump station would pump pretreated stormwater that is not able to infiltrate within 48 hours out of the underground infiltration gallery back to the channel for infiltration at North Hollywood Park.

The underground infiltration gallery would have the ability to store up to 479,000 cubic feet of water. The park would receive flows from the surrounding neighborhood, with a total area of approximately 172 acres. Flows from this drainage area would converge from a 16-foot by 5.75-foot concrete channel to a 36-inch-diameter RCP, where water would be diverted into the infiltration gallery. The infiltration gallery would require excavation to a depth of 25 feet bgs.

Some recreational facilities would be closed during construction. Closures and recreational restrictions would be determined once the design is finalized.

A concrete service access road/paths would be constructed to allow operation and maintenance activities to service proposed park facilities. The access road/paths would provide access from Laurel Canyon Boulevard at the southeast boundary of the park. The access road/walkway would extend west through the park to an existing access road along the Central Branch of the Tujunga Wash at the western boundary of the park. Surface landscape features and park areas impacted by park construction would be replaced in kind. Passive park space would be retained, with changes limited to those required to meet current standards. Other park improvements would include irrigation system upgrades, planting of new trees for increased canopy cover and screening the adjacent freeway from park uses, replacement lighting, and new walking trail paths. Figure 1-10 shows a conceptual park improvement site plan.

Electrical service upgrades would be required (upgrading to a 3-phase 480-volt electrical service with step-down transformer and 120/240-volt subpanel to serve the instrumentation and smaller loads).

SOURCE: Nearmap, 2020; County of Los Angeles

Stormwater Capture Parks Program

Figure 1-19
Alexandria Park

ESA

North Hollywood Park

Program activities at North Hollywood Park would include installation of several infiltration galleries totaling approximately 354,300 square feet to capture and infiltrate stormwater. Due to the large size of this park project site, construction would be separated into two subsections, subsection A on the north side and subsection B on the south side of the park (**Figure 1-20**). The infiltration gallery footprint would be located within existing parking lots and open space areas landscaped with irrigated turf grass. The infiltration galleries would not impact a small pomegranate tree garden established in 2015 to commemorate the 100th anniversary of the Armenian Genocide. Construction of the underground infiltration galleries would include installation of up to three diversion structures, pipes, up to three HDS units, up to three pump stations, up to three flow-measuring devices, and educational signage.

A grated drop inlet at the bottom of the channel or side inlet diversion would divert water from the storm channel to the HDS unit, then to the pump station, then to the inlet of the underground infiltration gallery. An inflatable rubber dam that inflates to approximately 3 to 4 feet tall and matches the width of the channel may be added to impede flows and divert stormwater into the drop inlet. When deflated, the rubber dam would be flush with the channel bottom so as not to reduce the hydraulic capacity of the channel. An HDS unit would be placed upstream to help separate and trap trash, debris, sediment, oils, and grease from stormwater runoff.

The underground infiltration galleries would have the ability to store up to 5,140,100 cubic feet of water. The park would receive flows from the surrounding neighborhood, with a total tributary area of approximately 2,050 acres. Flows from this drainage area would converge to various sizes of storm drains and the Tujunga Wash Central Branch, where water would be diverted into the infiltration galleries. The infiltration galleries would require excavation to a depth of 26 feet bgs.

Some recreational facilities would be closed during construction. Closures and recreational restrictions would be determined once the design is finalized.

Operation and maintenance vehicles would be able to access proposed park facilities via Chandler Boulevard, Tujunga Avenue, and Magnolia Boulevard. Components proposed within Tujunga Wash, including the inflatable rubber dam and diversion structure within the channel, may be accessed by operation and maintenance workers via an existing County access road from Magnolia Boulevard.

Construction of new stormwater capture facilities would disturb surface landscape features, and the park site plan would replace these features in kind. Ball fields and passive park spaces would be retained in their current locations with changes required to meet current standards. The parking lot would be reconstructed to include electrical vehicle charging stations and permeable pavement. Ball field appurtenances existing on-site, such as backstops and dugouts, would be replaced and a new hydration station would replace existing drinking fountains. Figure 1-11 shows a conceptual park improvement site plan.

Electrical service upgrades would be required (upgrading to a 3-phase 480-volt electrical service).

SOURCE: Nearmap, 2020; County of Los Angeles

Stormwater Capture Parks Program

Figure 1-20
North Hollywood Park

ESA

Valley Village Park

Program activities at Valley Village Park would include installation of one underground infiltration gallery covering approximately 38,400 square feet in the southern portion of the park to capture and infiltrate stormwater (**Figure 1-21**). The infiltration gallery footprint would be located in an open space area landscaped with grass and trees. Construction of the underground infiltration gallery would include installation of one storm drain diversion structure, a stormwater pipe, two HDS units, a flow-measuring device, and educational signage. The diversion structure and stormwater facilities would all be located within the park facility.

The underground infiltration gallery would have the ability to store up to 310,200 cubic feet of water. The park would receive flows from the surrounding neighborhood, with a total area of approximately 455 acres. Flows from this drainage area would converge from a 90-inch-diameter storm pipe to a 36-inch RCP, where water would be diverted into the infiltration gallery. The infiltration gallery would require excavation to a depth of 30 feet bgs.

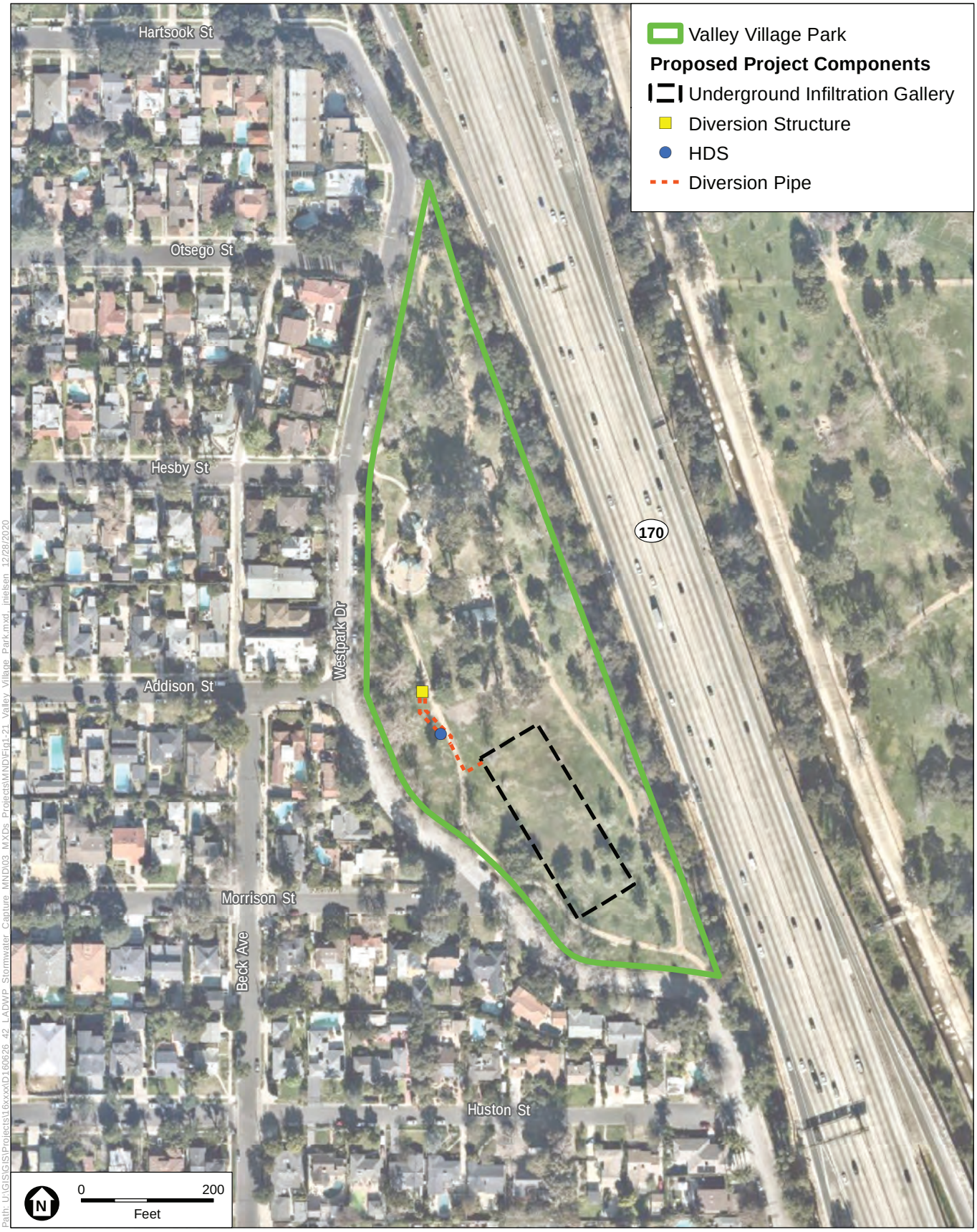
Some recreational facilities would be closed during construction. Closures and recreational restrictions would be determined once the design is finalized.

The proposed park improvements would include new walking paths. The proposed walking paths would be used during operation and maintenance of the proposed stormwater capture facilities. Above the proposed structure, the park would be graded and revegetated with grass or other park improvements to maintain recreational use. Valley Village Park improvements would include enhanced walking paths, exercise areas, landscaping, native planting, and additional tree replacement planting. Figure 1-12 shows a conceptual park improvements site plan.

Other improvements would include upgrading irrigation, and adding hydration stations. Valley Village Park has existing LADWP electrical service supply, and no electrical upgrades are required.

1.6 Program Construction

Construction activities at all nine parks would include the following phases: site clearing and preparation; grading and excavation; installation of the stormwater capture system; soil filling, revegetation, and park improvements; and infrastructure upgrades. Construction activities at each project site could overlap by phase, and individual park projects may be constructed simultaneously. Up to seven park projects could be constructed at the same time and be in varying phases of construction. Four of the nine park projects (David M. Gonzales Recreation Center, Fernangeles Park, Strathern Park North, and Whitsett Fields Park North) would require construction of a diversion structure and pipe along city streets within the public right-of-way. Construction related to the installation of diversion structures and diversion pipes within city streets would require partial road closures with intermittent full road closures as permitted by Caltrans and/or Los Angeles Department of Transportation. Construction equipment outlined in the following sections were determined based on the most current preliminary design reports. The equipment fleet would be determined by the construction contractor after final design has been completed.



SOURCE: Nearmap, 2020; County of Los Angeles

Stormwater Capture Parks Program

Figure 1-21
Valley Village Park

ESA

Site Clearing and Preparation

Prior to construction activities, crews would install a chain-link fence around the proposed work and staging areas. Construction activities would begin with clearing of vegetation, generally landscape turf grasses or other ornamental plants, and removal of existing park equipment, if needed.

Table 1-1 provides a proposed equipment list and duration for this phase of construction for each of the nine park projects. In addition, the maximum number of truck trips per day and the total number of workers required per day during construction are included in Table 1-1.

Grading and Excavation

Table 1-2 provides a proposed equipment list and duration for this phase of construction for each of the nine park projects. In addition, the maximum number of truck trips per day and the total number of workers required per day during construction are included in Table 1-2.

TABLE 1-1
CONSTRUCTION DETAILS FOR SITE CLEARING AND PREPARATION PHASE

Park	Construction Equipment	Phase Duration	Maximum Truck Trips per Day	Workers per Day
David M. Gonzales Recreation Center	Dozer (2), Core Drill (1), Industrial Saw (1)	2 weeks	8	15
Fernangeles Park	Dozer (2), Core Drill (1), Industrial Saw (1)	2 weeks	8	15
Strathern Park North	Dozer (2), Core Drill (1), Industrial Saw (1)	2 weeks	8	15
Whitsett Fields Park North	Dozer (2)	8 weeks	4	12
Valley Plaza Park North	Dozer (3)	2 weeks	8	15
Valley Plaza Park South	Dozer (1)	1 week	8	10
Alexandria Park	Dozer (1)	1 week	8	10
North Hollywood Park (A)	Dozer (3)	2 weeks	8	15
North Hollywood Park (B)	Dozer (3)	1 week	8	15
Valley Village Park	Dozer (1)	2 weeks	2	8

TABLE 1-2
CONSTRUCTION DETAILS FOR GRADING AND EXCAVATION PHASE

Park	Construction Equipment	Phase Duration	Maximum Truck Trips per Day	Workers per Day	Excavated Material (CY)	Exported Soil (CY)
David M. Gonzales Recreation Center	Backhoe Loader (2), Dumper (2), Excavator (2), Dozer (1), Front Loader (2)	32 weeks	80	35	130,000	80,000
Fernangeles Park	Backhoe Loader (2), Dumper (2), Excavator (2), Dozer (1), Front Loader (2)	37 weeks	80	35	90,000	60,000
Strathern Park North	Backhoe Loader (2), Dumper (2), Excavator (2), Dozer (1), Front Loader (2)	37 weeks	80	35	80,000	50,000
Whitsett Fields Park North	Backhoe Loader (1), Dumper (2), Excavator (1), Front Loader (1),	28 weeks	20	20	48,700	28,000
Valley Plaza Park North	Backhoe Loader (2), Dumper (2), Excavator (1), Front Loader (2)	12 weeks	80	42	177,000	125,000
Valley Plaza Park South	Backhoe Loader (2), Dumper (2), Excavator (1), Front Loader (1)	20 weeks	64	28	49,000	28,000
Alexandria Park	Backhoe Loader (2), Dumper (2), Excavator (1), Front Loader (1)	13 weeks	64	28	32,000	25,000
North Hollywood Park (A)	Backhoe Loader (2), Dumper (2), Excavator (1), Front Loader (2)	26 weeks	80	42	196,000	156,500
North Hollywood Park (B)	Backhoe Loader (2), Dumper (2), Excavator (1), Front Loader (2)	18 weeks	80	42	131,000	104,500
Valley Village Park	Backhoe Loader (1), Dumper (2), Excavator (1), Front Loader (1)	12 weeks	20	16	44,058	12,200

A backhoe loader and/or excavator would be used to excavate the soil to prepare for the stormwater capture system installation. Shoring would be required during excavation at some locations. Other park project sites may employ sloped-excavations. Pile driving would be necessary for shoring the excavated trenches. The total amount of excavated material and material required to be exported off-site per park project site is shown on Table 1-2. Excavated materials not exported off-site would be stockpiled within the park areas to be used to cover the stormwater capture system once installed. All trenches and work areas would be secured at the end of each workday.

Stormwater Capture System Installation

Table 1-3 provides a proposed equipment list and duration for this phase of construction for each of the nine park projects. In addition, the maximum number of truck trips per day and the total number of workers required per day during construction are included in Table 1-3.

TABLE 1-3
CONSTRUCTION DETAILS FOR STORMWATER CAPTURE SYSTEM INSTALLATION PHASE

Park	Construction Equipment	Phase Duration	Maximum Truck Trips per Day	Workers per Day
David M. Gonzales Recreation Center	Trench Digger (2), Air Compressor (1), Loader (3), Soil Compactor (2), Crane (3), Pump (2), Pile Driver (1))	28 weeks	80	56
Fernangeles Park	Trench Digger (2), Air Compressor (1), Loader (3), Soil Compactor (2), Crane (3), Pump (2), Pile Driver (1)	28 weeks	80	56
Strathern Park North	Trench Digger (2), Air Compressor (1), Loader (3), Soil Compactor (2), Crane (3), Pump (2), Pile Driver (1)	28 weeks	80	56
Whitsett Fields Park North	Air Compressor (1), Loader (2), Soil Compactor (1), Crane (3), Pile Driver (1)	32 weeks	20	16
Valley Plaza Park North	Air Compressor (2), Loader (2), Soil Compactor (2), Crane (2), Pile Driver (2)	8 weeks	40	24
Valley Plaza Park South	Air Compressor (1), Loader (1), Soil Compactor (1), Crane (2), Pile Driver (1)	4 weeks	40	24
Alexandria Park	Air Compressor (1), Loader (1), Soil Compactor (1), Crane (2), Pile Driver (1)	4 weeks	40	24
North Hollywood Park (A)	Air Compressor (2), Loader (2), Soil Compactor (2), Crane (3), Pile Driver (3)	26 weeks	40	24
North Hollywood Park (B)	Air Compressor (2), Loader (2), Soil Compactor (2), Crane (3), Pile Driver (3)	14 weeks	40	24
Valley Village Park	Air Compressor (1), Loader (2), Soil Compactor (1), Crane (2), Pile Driver (1)	28 weeks	20	16

The stormwater capture system infiltration galleries would be delivered to the project site via truck. A crane would lower each gallery into the excavated portion of the site. Galleries would be assembled on-site.

Construction of the proposed diversion pipe along city streets would involve trenching using a conventional cut and cover technique and jacking and boring where necessary. The trenching technique would include saw-cutting of the pavement where applicable, trench excavation, pipe installation, backfill operations, and restoration of pavement. Pile driving would be required. The trench would be approximately 8 feet wide and 10 feet deep. The installation of diversion structures and HDS units would require excavation areas of approximately 15 feet wide by 15 feet long by 30 feet deep.

Soil Filling, Revegetation, and Park Improvements

Table 1-4 provides a proposed equipment list for this phase of construction for each of the nine park projects. In addition, maximum number of truck trips per day, the total number of workers required per day during construction, and the amount of soil to be imported on-site are included in Table 1-4.

TABLE 1-4
CONSTRUCTION DETAILS FOR SOIL FILLING, REVEGETATION, AND PARK IMPROVEMENTS PHASE

Park	Construction Equipment	Phase Duration	Maximum Truck Trips per Day	Workers per Day	Imported Soil (CY)
David M. Gonzales Recreation Center	Dumper (4), Compact Track Loader (3), Soil Compactor/Roller (3), Excavator (1), Roller (1), Plate Compactor (1), Sheepfoot Roller (1), Grader (1), Scraper (1), Backhoe (1), Generator (1)	44 weeks	72	12	10,000
Fernangeles Park	Dumper (4), Compact Track Loader (3), Soil Compactor/Roller (3), Excavator (1), Roller (1), Plate Compactor (1), Sheepfoot Roller (1), Grader (1), Scraper (1), Backhoe (1), Generator (1)	44 weeks	72	12	15,000
Strathern Park North	Dumper (4), Compact Track Loader (3), Soil Compactor/Roller (3), Excavator (1), Roller (1), Plate Compactor (1), Sheepfoot Roller (1), Grader (1), Scraper (1), Backhoe (1), Generator (1)	44 weeks	72	12	10,000
Whitsett Fields Park North	Dumper (2), Excavator (1), Roller (1), Plate Compactor (1), Sheepfoot Roller (1), Grader (1), Scraper (1), Backhoe (1), Generator (1)	20 weeks	12	8	3,000
Valley Plaza Park North	Dumper (2), Excavator (1), Roller (1), Plate Compactor (1), Sheepfoot Roller (1), Grader (1), Scraper (1), Backhoe (1), Generator (1)	32 weeks	16	12	25,000
Valley Plaza Park South	Dumper (2), Excavator (1), Roller (1), Plate Compactor (1), Sheepfoot Roller (1), Grader (1), Scraper (1), Backhoe (1), Generator (1)	33 weeks	16	7	3,000
Alexandria Park	Dumper (2), Excavator (1), Roller (1), Plate Compactor (1), Sheepfoot Roller (1), Grader (1), Scraper (1), Backhoe (1), Generator (1)	24 weeks	16	7	3,000
North Hollywood Park (A)	Dumper (2), Excavator (1), Roller (1), Plate Compactor (1), Sheepfoot Roller (1), Grader (1), Scraper (1), Backhoe (2), Generator (2)	18 weeks	16	12	11,000
North Hollywood Park (B)	Dumper (2), Excavator (1), Roller (1), Plate Compactor (1), Sheepfoot Roller (1), Grader (1), Scraper (1), Backhoe (2), Generator (2)	12 weeks	72	12	7,500
Valley Village Park	Dumper (2), Excavator (1), Roller (1), Plate Compactor (1), Sheepfoot Roller (1), Grader (1), Scraper (1), Backhoe (1), Generator (1)	32 weeks	12	8	2,000

Once installation of the stormwater system is complete, soils stockpiled on-site would be used to backfill the impact areas. Additional imported soils (see Table 1-4) would be used to regrade and return the project impact areas to pre-project conditions. Grassy areas and ball fields, as well as other impacted park facilities, would be reconfigured and returned to normal or updated conditions. Additional park improvements would be implemented as determined with input from RAP and the local community. Currently, park improvement designs are in the early stages; preliminary designs are shown in Figures 1-4 through 1-12.

Additional infrastructure upgrades at individual parks may include pump station/electrical improvements, street improvements, and building construction (for rubber dams). Pump station improvements and electrical infrastructure upgrades would be required at Strathern Park North,

Whitsett Fields Park North, Valley Plaza Park North, Valley Plaza Park South, Alexandria Park, and North Hollywood Park (A and B). In addition, building construction would be required at Valley Plaza Park South, Alexandria Park, and North Hollywood Park (A and B), and street improvements would be required at David M. Gonzales Recreation Center, Whitsett Fields Park North, and Fernangeles Park. **Table 1-5** provides additional information, including equipment, phase duration, total truck trips per day, and total workers per day at each park project site.

TABLE 1-5
CONSTRUCTION DETAILS FOR INFRASTRUCTURE UPGRADE PHASE

Park	Phase	Construction Equipment	Phase Duration	Maximum Truck Trips per Day	Workers per Day
David M. Gonzales Recreation Center	Street Improvement	Cement and Mortar Mixers (1), Pavers (1), Paving Equipment (2), Rollers (2), Tractors (1)	12 weeks	14	8
Fernangeles Park	Street Improvement	Cement and Mortar Mixers (1), Pavers (1), Paving Equipment (2), Rollers (2), Tractors (1)	48 weeks	14	8
Strathern Park North	Pump Station/Electrical Improvements	Trench Digger (2), Air Compressor (1), Soil Compactor (2), Loader (2), Crane (2), Pump (2)	48 weeks	2	8
Whitsett Fields Park North	Pump Station/Electrical Improvements	Auger Post Drill (1), Crane (1)	48 weeks	4	6
Valley Plaza Park North	Pump Station/Electrical Improvements	Forklift (1), Power Drill (1), Trench Digger (2), Soil Compactor (2), Loader (2)	48 weeks	8	4
Valley Plaza Park South	Pump Station/Electrical Improvements	Forklift (1), Power Drill (1), Trench Digger (1), Soil Compactor (1), Loader (1)	24 weeks	4	2
	Building Construction	Excavator (1), Concrete Truck (1), Forklift (1), Crane (1), Power Drill (1)	3 weeks	-	5
Alexandria Park	Pump Station/Electrical Improvements	Forklift (1), Power Drill (1), Trench Digger (1), Soil Compactor (1), Loader (1)	12 weeks	4	2
	Building Construction	Excavator (1), Concrete Truck (1), Forklift (1), Crane (1), Power Drill (1)	3 weeks	-	5
North Hollywood Park (A)	Pump Station/Electrical Improvements	Forklift (1), Power Drill (1), Trench Digger (3), Soil Compactor (3), Loader (3)	32 weeks	12	6
	Building Construction	Excavator (1), Concrete Truck (1), Forklift (1), Crane (1), Power Drill (1)	3 weeks	-	5
North Hollywood Park (B)	Pump Station/Electrical Improvements	Forklift (1), Power Drill (1), Trench Digger (3), Soil Compactor (3), Loader (3)	48 weeks	12	6
	Building Construction	Excavator (1), Concrete Truck (1), Forklift (1), Crane (1), Power Drill (1)	3 weeks	-	5
Valley Village Park	*NA*				

Construction Staging

Construction staging areas would be identified by the contractor for laydown and soil stockpiling within the proposed park area or near the construction zone, if needed. Equipment and vehicle staging would be determined prior to construction and would be placed near the proposed park project impact areas.

Program Construction Schedule

The proposed Program would take approximately 4.5 years to construct. Construction of the proposed Program is anticipated to begin in June 2022 and conclude in November 2026. Construction at the parks could overlap, as shown in **Table 1-6**. Construction will generally occur between 7 A.M. to 7 P.M., Monday through Friday. Weekend and nighttime construction would be avoided when feasible.

TABLE 1-6
CONSTRUCTION SCHEDULE

Park	Start Date	End Date	Duration
David M. Gonzales	June 2022	November 2023	18 months
Fernangeles	June 2022	November 2023	18 months
Strathern Park North	June 2022	November 2023	18 months
Whitsett Fields Park North	June 2025	November 2026	18 months
Valley Plaza Park North	November 2023	March 2025	17 months
Valley Plaza Park South	January 2025	May 2026	17 months
Alexandria	January 2025	May 2026	17 months
North Hollywood (A)	August 2023	July 2025	24 months
North Hollywood (B)	August 2023	May 2025	
Valley Village	June 2022	November 2023	18 months

1.7 Operation and Maintenance Activities

Once construction is completed, proposed Program components would be mainly underground and each individual park area would be returned to pre-project conditions and remain usable for recreational purposes. LASAN staff would operate and maintain the new facilities. Installed maintenance holes would be accessible to LASAN and would be used for operation and maintenance purposes. Each park facility would be visually inspected after every storm event. This would help determine functionality and, for the pre-treatment BMPs, estimate the rate of pollutant buildup from each storm drain diversion. If, upon inspection, it is determined that a BMP does not meet the specified design criteria, it would be repaired, improved, and replaced as soon as practicable and safe. Any accumulated sediment and trash should be removed to maximize the performance of the facility throughout the following wet season.

Each catch basin and HDS unit would be inspected bi-monthly to ensure that there is no trash or debris accumulation that would impede the diversion of dry- and wet-weather runoff to the

pre-treatment and infiltration facilities. Cleaning could require the closure of traffic lane(s) for those facilities located on city streets at David M. Gonzales Recreation Center, Fernangeles Park, Strathern Park North, and Whitsett Fields Park North for the safety of the crew servicing the structure. The cleaning would require a sump vacuum or vacuum truck to remove the accumulated trash and debris.

The pre-treatment facilities and infiltration galleries would be visually inspected and vacuumed on a bi-monthly basis to ensure proper infiltration and check the integrity of the structure. Operation and maintenance vehicles would travel along new or existing designated roads. A vacuum truck would access the maintenance holes of the underground infiltration galleries to remove trash and sediment.

Pump station maintenance would occur bi-monthly or as needed. Valve and control panel maintenance would occur as needed and would be done according to the manufacturer's requirements.

Solar operational activities at David M. Gonzales Recreation Center would be limited to monitoring the facilities' performance and conducting scheduled maintenance for electrical equipment. Long-term maintenance and equipment replacement for solar equipment would be scheduled in accordance with manufacturer recommendations.

Trails, signage, and other site amenities would be inspected on a bi-monthly basis. Trails would be inspected to ensure there are no trip hazards and that vegetation is not creeping onto the trails/paths. The signage and other site amenities could be subjected to graffiti and would be dealt with as needed.

Landscape maintenance activities would continue to be conducted by RAP, similar to existing conditions. New irrigation systems would be inspected weekly, particularly during the first dry season after planting to ensure that controllers and valves are operating properly, plants are not being over or under watered, and broken or leaking pipes are repaired promptly until plants are established.

Park landscape maintenance and operational activities would continue to occur similar to existing conditions and no impacts to existing and planned recreational areas/activities would occur during operations and maintenance. Stormwater capture facility operations and maintenance activities would not impact or interfere with recreational activities. RAP and LASAN currently access each park project site for maintenance and solid waste pickup. Truck usage along park trails and roads would occur similar to existing conditions and would occur outside of each park's peak activity period.

A detailed maintenance program would be developed for each park once the final design of the project has been completed. The detailed maintenance program would include the responsible parties and the park elements for which they would be responsible, and operations and maintenance details for each project component. In addition, the plan would include vector control measures.

1.8 Project Approvals

This Initial Study (IS)/Mitigated Negative Declaration (MND) has been prepared to meet all of the substantive and procedural requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.). Accordingly, LADWP is the Lead Agency for the proposed Program. Approval of the Program and adoption of the MND will be required by the Los Angeles Board of Water and Power Commissioners.

Other City departments, including RAP and Department of Public Works, are considered responsible agencies and may also require approvals from their respective Boards of Commissioners. Within the Department of Public Works, BOE is responsible for project design and construction, and LASAN is responsible for long-term operation and maintenance of the stormwater capture systems. RAP is responsible for long-term operation and maintenance of park improvements/amenities.

Additionally, numerous approvals and/or permits from other regulatory agencies or entities would be required prior to implementing the proposed Program. Permits and/or approvals may include, but are not limited to, the items listed in **Table 1-7**. This IS/MND may be used for future project approvals from other agencies.

TABLE 1-7
DISCRETIONARY PERMITS POTENTIALLY REQUIRED

Agency	Permits and Authorizations Potentially Required
Los Angeles Department of Water and Power	• Approval by LADWP Board of Water and Power Commissioners
City of Los Angeles, Bureau of Engineering	• Approval by the Board of Public Works Commissioners • Excavation Permit
City of Los Angeles, Department of Recreation and Parks	• Approval by the Board of Recreation and Parks Commissioners • Right of Entry Permit
Los Angeles Department of Transportation	• Temporary Traffic Control Plan • Temporary Signal and Temporary Signing and Striping Plan
California Department of Transportation	• Encroachment Permits
City of Los Angeles, Department of Building and Safety	• Building, Plumbing, and/or Sewer Connection Permits • Local Enforcement Agency – Notification requirements for activities at known waste disposal sites (applies to Strathern Park North only)
Los Angeles Flood Control District	• Flood Control Construction Permit
City of Los Angeles, Bureau of Street Services	• Tree Removal Permit
State Water Resources Control Board	• National Pollutant Discharge Elimination System (NPDES) General Stormwater Permit Associated with Construction Activities
Los Angeles Regional Water Quality Control Board	• 401 Water Quality Certification • Waste Discharge Requirements • Construction Groundwater Dewatering Permit
U.S. Army Corps of Engineers	• Section 404 Permit
California Department of Fish and Wildlife	• Section 1602 Lake and Streambed Alteration Agreement

SECTION 2
Initial Study/Mitigated Negative Declaration

1. **Project Title:** Stormwater Capture Parks Program

2. **Lead Agency Name and Address:** Los Angeles Department of Water and Power
111 N. Hope Street, Room 1050
Los Angeles, CA 90012

3. **Contact Person and Phone Number:** Christopher Lopez
213.367.3509

4. **Project Location:** David M. Gonzales Recreation Center, Whitsett Fields Park North, Valley Park North, Alexandria Park, North Hollywood Park, Strathern Park North, Valley Plaza Park South, Valley Village Park, and Fernangeles Park

5. **Project Sponsor's Name and Address:** Same as Lead Agency

6. **General Plan Designation(s):** Open Space

7. **Zoning:** Open Space (OS)

8. **Description of Project:** (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

The Stormwater Capture Parks Program (Program) has identified nine City-owned parks to help accommodate the implementation of stormwater capture projects to capture surface flow and divert stormwater runoff from the Tujunga Wash Central Branch storm drain to recharge the groundwater basin. These parks include: David M. Gonzales Recreation Center, Fernangeles Park, Strathern Park North, Whitsett Fields Park North, Valley Plaza Park North, Valley Plaza Park South, Alexandria Park, North Hollywood Park, and Valley Village Park. The Program would install subsurface infiltration galleries at the various parks. See Section 1 for a more detailed project description

9. **Surrounding Land Uses and Setting.** (Briefly describe the project's surroundings.)

The proposed Program is located across nine parks in the Los Angeles area. The park project sites have open space land use designations, and the settings surrounding the parks include public facilities, residential, manufacturing, and commercial uses. These parks are located in highly urbanized areas.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

See Section 1, Table 1-7.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

To date, two California Native American tribes have requested consultation. Consultation meetings were held on May 28, 2020 and October 1, 2020. See Section 2.18 for details.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology/Soils	☐ Greenhouse Gas Emissions	☒ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☒ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☒ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☒ Wildfire	☒ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial study:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ 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.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Nadia J Parker for Charles C. Holloway — 12/30/20

Signature — Date

Signature — Date

Environmental Checklist

2.1 Aesthetics

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
AESTHETICS — Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** There are several scenic vistas located throughout the City of Los Angeles, including the San Gabriel. Verdugo and Santa Susana Mountains to the north, the Santa Monica Mountains that extend across the middle of the City, the Palos Verdes Hills and Pacific Ocean to the south and west, and the Los Angeles River. Part of the Transverse Ranges Geomorphic Province, the Santa Monica Mountains are the most visible feature from many parts of the City; the mountain range is 60 miles long from west to east, and stretches from Griffith Park in Los Angeles County to the Santa Monica National Recreation Area in Ventura County. The Los Angeles River and its associated tributaries and flood plains also are prominent topographic features (City of Los Angeles 2001). The closest scenic vistas to the proposed Program area are the Santa Monica Mountains, which are approximately 1.5 miles south of the proposed Program area's most southerly point, North Hollywood Park. Construction activities could temporarily cause disruptions to local views of the Santa Monica Mountains due to the presence of construction equipment. However, construction activities would be temporary, with proposed project construction timelines ranging from 17 to 24 months. Construction impacts would be considered less than significant.

Once constructed, the proposed stormwater capture projects would be located underground and the proposed park project sites would serve a dual use. Where needed, new maintenance roads would be constructed at each proposed park project site in order to access maintenance holes for operational purposes. These maintenance roads would be incorporated into the park design as walking paths or for other recreational opportunities. Where available, existing walking paths would also be used for maintenance purposes.

The parks' recreational facilities and maintenance paths would be incorporated into the overall recreational improvements and park design. The City has committed to park enhancements and improvements to further benefit the park users and local residents, and these enhancements would be determined with input from RAP and the local community. Although these parks would serve a dual-use function as an LADWP facility and park, the emphasis on the redesign and improvement of the proposed park project sites post-construction would be on recreation and upgrades to the overall look and function of the existing park, as shown in the preliminary park design figures (Figures 1-4 through 1-12). The construction of a solar carport at David M. Gonzales Recreation Center would alter the currently look of the open parking area, however, would not differ from other parking areas. No public views would be blocked by the proposed structure. In addition, the structure would help provide shade for the parked cars. Therefore, operation of the proposed Program would not result in a substantial adverse effect on a scenic vista and impacts would be considered less than significant.

b) **Less than Significant Impact.** There are only two officially designated scenic highways in Los Angeles County: Malibu Canyon–Los Virgenes Highway (N1) from SR 1 to Lost Hills Road, and Mullholland Highway–SR 1 to Kanan Dume Road and West Cornell Road to Los Virgenes Road (Caltrans 2020a). The proposed Program would be located approximately 18.5 miles west from these designated scenic highways (at Valley Village Park) and would not be visible from these highways due to distance and existing topography. Highway 210 is designated as an eligible scenic highway and is located approximately 9.6 miles east of the proposed Program area (Caltrans 2020b). However, views from the eligible portion of Highway 210 of the proposed Program area are mostly obstructed by the Verdugo Mountains. As stated above in Section 2.1 (c), the City has committed to park enhancements and improvements to further benefit the park users and local residents, and these enhancements would be determined with input from RAP and the local community. The proposed Program would not include substantial damage to scenic resources, including trees, rock outcropping, or historic structures, and impacts would be considered less than significant.

c) **Less than Significant Impact.** The proposed project sites are located in urbanized areas. Construction activities would require the use of heavy equipment and storage of materials on-site. During construction, excavated areas, stockpiled soils, and other materials at the construction site and staging areas would be visible. However, these visual obstructions would be temporary and would only occur during the construction phase. Once construction is completed, stormwater capture facilities would be located mostly underground and proposed project sites would be returned to preconstruction conditions. As such, the proposed Program would not degrade the visual character or quality of the site or its surroundings. Additionally, the proposed park project sites are all zoned as Open Space (City of Los Angeles 2020). Implementation of the proposed Program would not involve the rezoning of any of the parks or any adjacent parcel of land. The proposed Program would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.

d) **Less than Significant Impact.** The proposed park project sites are located in highly urbanized areas, which contain cars and streetlights that emit light and glare during the day and night. Construction is mainly anticipated to occur during the day; however, nighttime construction may occur if necessary. Nighttime construction would be temporary and limited to the area immediately surrounding the active construction site. All lighting would be shielded and pointed toward the construction activity, away from surrounding sensitive land uses. Therefore, impacts would be less than significant.

Once constructed, proposed stormwater capture facilities would be contained mainly underground and would not create large expanses of reflective material that could cause glare. The proposed park project improvements may require replacement lighting or the addition of new lighting at the ball fields or recreational facilities. All lighting would be shielded and pointed away from the surrounding street and sensitive land uses. Solar panels would be placed on top of the carport and would not be easily visible by vehicles traveling along Herrick Avenue. Solar panels are made to absorb light and would not create a new source of light or glare in the area. Therefore, with adherence to local regulations regarding nighttime lighting, impacts related to light and glare would be less than significant.

References

California Department of Transportation (Caltrans), 2020a. Officially Designated County Scenic Highways. Available at: https://dot.ca.gov/-/media/dot-media/programs/design/documents/od-county-scenic-hwys-2015-a11y.pdf. Accessed May 14, 2020.

Caltrans, 2020b. List of Eligible and Officially Designated State Scenic Highways. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed May 14, 2020.

City of Los Angeles, 2001. City of Los Angeles General Plan: Conservation Element. Adopted September 2001.

City of Los Angeles, 2020. Zone Information and Map Access System (ZIMAS). Available at: http://zimas.lacity.org/. Accessed April 20, 2020.

National Wild and Scenic River System, 2020. About the WSR Act. Available at: https://www.rivers.gov/wsr-act.php. Accessed May 14, 2020.

2.2 Agriculture and Forestry Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
AGRICULTURE AND FORESTRY RESOURCES — In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

a) **No Impact.** The City of Los Angeles only has a few parcels of land that are deemed as farmland, but this agricultural use is related to a community college's educational curriculum (City of Los Angeles 2001). The proposed Program area is located on land zoned as OS (Open Space) (City of Los Angeles 2020). Additionally, while portions just outside of the Program area are included in the Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) survey, no proposed park project would be located within the FMMP survey boundaries (DOC 2016a). Therefore, implementation of the proposed Program would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impact would occur.

The Farmland Protection Policy Act (FPPA) of 1981 is intended to minimize the unnecessary conversion of farmland to nonagricultural uses (USDA NRCS 2020). The FPPA established the Farmland Protection Program and a Land Evaluation and Site Assessment system. The Natural Resources Conservation Service administers the Farmland Protection Program, which is a voluntary program that provides funds to help purchase development rights to keep productive farmland in agricultural use. The requirements of the FPPA would apply if the proposed Program would result in the

conversion of farmland. As stated above, the proposed Program would not be located on important farmland. Therefore, no impact would occur.

b) **No Impact.** According to the DOC, the proposed Program area is not located on land under a Williamson Act contract (DOC 2016b). In addition, as discussed above, the Program area is not located on land zoned for agricultural use (City of Los Angeles 2020). Therefore, implementation of the proposed Program would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

c, d) **No Impact.** The City of Los Angeles General Plan Land Use Elements and zoning maps do not include zoning categories related to forest land, timberland, or timberland zoned as Timberland Production (City of Los Angeles 2015a). The proposed stormwater capture facilities would not be located on U.S. Department of Agriculture Forest Service land. The nearest forest land is Angeles National Forest located approximately 2 miles northeast of the northernmost site, the David M. Gonzales Recreation Center (USDA Forest Service 2018). The stormwater capture facilities would be constructed mainly within existing recreational facilities, zoned as OS, and surrounded by residential or commercial land uses. Therefore, the proposed Program would not conflict with existing zoning for these uses, and would not result in the conversion of forest land. No impact would occur.

e) **No Impact.** As discussed above, the Program area is not located on land designated as Prime Farmland, Unique Farmland, Farmland of Statewide Importance, timberland, or forest land. Therefore, implementation of the proposed Program would not convert farmland or forestland, and no impact would occur.

References

California Department of Conservation (DOC), 2016a. Farmland Mapping and Monitoring Program: Los Angeles County. Available at: https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx. Accessed April 20, 2020.

DOC, 2016b. Los Angeles County Williamson Act FY 2015-2016, Published 2016.

City of Los Angeles, 2001. Conservation Element of the City of Los Angeles General Plan, Adopted September 2001. Available at: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf. Accessed April 20, 2020.

City of Los Angeles, 2020. Zone Information and Map Access System (ZIMAS). Available at: http://zimas.lacity.org/. Accessed April 20, 2020.

United States Department of Agriculture (USDA), Forest Service, 2020. National Forests in California, Available at: https://www.fs.usda.gov/detailfull/r5/maps-pubs/?cid=STELPRD3806421&width=full. Accessed April 20, 2020.

USDA, Natural Resources Conservation Service (NRCS), 2020. Farmland Protection Policy Act, Available at: https://www.nrcs.usda.gov/wps/portal/nrcs/detail/?cid=nrcs143_008275. Accessed April 20, 2020.

2.3 Air Quality

Issues (and Supporting Information Sources):		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
AIR QUALITY — Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Discussion

The Program would be located within Los Angeles County and therefore is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD has jurisdiction over air quality planning for all of Orange County and Los Angeles County except for the Antelope Valley, the non-desert portion of western San Bernardino County, and the western and Coachella Valley portions of Riverside County. The South Coast Air Basin (Air Basin) is a subregion within SCAQMD jurisdiction. While air quality in the Air Basin has improved, the Air Basin requires continued diligence to meet the air quality standards.

Air Quality Management Plan

SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The SCAQMD Governing Board adopted the 2016 AQMP on March 3, 2017 (SCAQMD 2017). The California Air Resources Board (CARB) approved the 2016 AQMP on March 23, 2017. Key elements of the 2016 AQMP include implementing fair-share emissions reductions strategies at the federal, state, and local levels; establishing partnerships, funding, and incentives to accelerate deployment of zero emissions (ZE) and near-zero-emissions (NZE) technologies; and taking credit from co-benefits from greenhouse gas (GHG), energy, transportation and other planning efforts (SCAQMD 2017). The strategies included in the 2016 AQMP are intended to demonstrate attainment of the NAAQS for the national non-attainment pollutants, ozone (O_3) and fine particulate matter (PM2.5) (SCAQMD 2018). The strategies that are particularly relevant to the project include the following:

> **MOB-08 – Accelerated Retirement of Older On-Road Heavy-Duty Vehicles:** This measure seeks to replace up to 2,000 heavy-duty vehicles per year with newer or new vehicles that at a minimum, meet the 2010 on-road heavy-duty nitrogen oxide (NO_X) exhaust emissions standard of 0.2 grams per brake horsepower-hour (g/bhp-hr).

MOB-10 – Extension of the SOON Provision for Construction/Industrial Equipment: This measure continues the Surplus Off-Road Option for NO_X (SOON) provision of the Statewide In-Use Off-Road Fleet Vehicle Regulation through the 2031 timeframe.

SCAQMD's CEQA guidelines are voluntary initiatives recommended for consideration by local planning agencies. The *CEQA Air Quality Handbook* (Handbook) published by SCAQMD provides local governments with guidance for analyzing and mitigating project-specific air quality impacts (SCAQMD 1993). SCAQMD is currently updating some of the information and methods in the Handbook, such as the screening tables for determining the air quality significance of a project and the on-road mobile source emission factors. While this process is underway, SCAQMD recommends using other approved models to calculate emissions from land use projects, such as CalEEMod (SCAQMD 2020a).

The SCAQMD *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* considers impacts to air quality sensitive receptors from toxic air contaminant (TAC)-emitting facilities (SCAQMD 2005). SCAQMD's siting distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for air quality sensitive receptors proposed in proximity to freeways and high-traffic roads, and the same siting criteria for distribution centers and dry cleaning facilities).

The SCAQMD Final Localized Significance Threshold Methodology and Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM2.5 Significance Thresholds provides guidance when evaluating the localized effects of emissions in the CEQA evaluation (SCAQMD 2008a; SCAQMD 2006). These guidance documents were promulgated by the SCAQMD Governing Board as a tool to assist lead agencies to analyzed localized impacts associated with project-specific level proposed projects. The guidance documents establish mass emission rate "look up tables" as significance thresholds for projects that are five acres or less. For projects that are larger than five acres, such as the proposed project, it is recommended that project-specific air quality dispersion modeling is completed to determine localized air quality.

Toxic Air Contaminants

At the local level, air pollution control or management districts may adopt and enforce CARB control measures. Under SCAQMD Regulation XIV (Toxics and Other Non-Criteria Pollutants), and in particular Rule 1401 (New Source Review), all sources that possess the potential to emit TACs are required to obtain permits from SCAQMD. Permits may be granted to these operations if they are constructed and operated in accordance with applicable regulations, including new source review standards and air toxics control measures. SCAQMD limits emissions and public exposure to TACs through a number of programs. SCAQMD prioritizes TAC-emitting stationary sources based on the quantity and toxicity of the TAC emissions and the proximity of the facilities to sensitive receptors.

In 2000, The Air Toxics Control Plan (revised in 2004) examined the overall direction of SCAQMD's air toxics control program. It includes development and implementation of strategic initiatives to monitor and control air toxics emissions. Control strategies that are deemed viable

and are within SCAQMD's jurisdiction will each be brought to the SCAQMD Board for further consideration through the normal public review process. Strategies that are to be implemented by other agencies will be developed in a cooperative effort, and the progress will be reported back to the SCAQMD Board periodically.

In 2015, SCAQMD completed the Multiple Air Toxics Exposure Study IV (MATES IV) (SCAQMD 2015a), which is a monitoring and evaluation study conducted in the Air Basin. MATES IV is a follow up to the 2008 MATES III study and consists of several elements including a monitoring program, an updated emissions inventory of toxic air contaminants, and a modeling effort to characterize risk across the Air Basin (SCAQMD 2008b). MATES IV focuses on the carcinogenic risk from exposure to air toxics. However, it does not estimate mortality or other health effects from particulate exposures. SCAQMD is currently in the process of updating the MATES studies series with MATES V; however, the analysis has not yet been completed.

Rules and Regulations

The SCAQMD has adopted many rules and regulations to regulate sources of air pollution in the Air Basin and to help achieve air quality standards. The Program may be subject to the following SCAQMD rules and regulations:

Regulation IV – Prohibitions: This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-up/shutdown exemptions and breakdown events. The following is a list of rules which apply to the project:

> ***Rule 401 – Visible Emissions:*** This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.
>
> ***Rule 402 – Nuisance:*** This rule states that a person 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 403 – Fugitive Dust:*** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM10 emissions to less than 50 micrograms per cubic meter ($\mu g/m^3$) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Control measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Finally, a contingency plan may be required if so

determined by USEPA. As a large site, the project would also be required to comply with subsection (e) of Rule 403 which includes additional requirements for large operations.

Regulation XI – Source Specific Standards: Regulation XI sets emissions standards for specific sources. The following is a list of rules which may apply to the project:

Rule 1113 – Architectural Coatings: This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil: This rule requires the SCAQMD approve a mitigation plan before any of the following activities occur onsite:

1. The excavation of underground storage tank or piping which has stored VOCs.

2. The excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricants, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs.

3. The handling or storage of VOC-contaminated soil [soil which registers >50 ppm or greater using an organic vapor analyzer calibrated with hexane] at or from an excavation or grading site; and/or

4. The treatment of VOC-contaminated soil at a facility.

Rule 1186 – PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations: This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM10 emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).

Regulation XIV – Toxics and Other Non-Criteria Pollutants: Regulation XIV sets requirements for new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants or other non-criteria pollutants. The following is a list of rules which may apply to the Project:

Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities: This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.

Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants: This rule minimizes the amount of off-site fugitive dust emissions containing toxic air contaminants by reducing particulate emissions in the ambient air from earth-moving activities.

Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines: This rule applies to stationary compression ignition engine greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.

a) **Less than Significant Impact.** The proposed Program is located within the 6,745-square-mile Air Basin. Air quality planning for the Air Basin is under the jurisdiction of the SCAQMD. The SCAQMD has adopted a series of AQMP to meet the CAAQS and NAAQS for criteria air pollutants. The SCAQMD is required, pursuant to the Clean Air Act (CAA), to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the NAAQS (i.e., O_3 and PM2.5). The SCAQMD, California Air Resources Board (CARB), and United States Environmental Protection Agency (USEPA) have adopted the 2012 AQMP which incorporates scientific and technological information and planning assumptions, regarding air quality and regional growth projections from the Southern California Association of Governments (SCAG), and emission inventory methodologies for various source categories (SCAQMD 2013). The key undertaking of the 2012 AQMP is to bring the Air Basin into attainment with the NAAQS for the 24-hour PM2.5 standard. It also intensifies the scope and pace of continued air quality improvement efforts toward meeting the 8-hour O_3 standard with new measures designed to reduce reliance on the federal CAA Section 182(e)(5) long-term measures for NO_X and volatile organic compound (VOC) reductions. The SCAQMD expects exposure reductions to be achieved through implementation of new and advanced control technologies as well as improvement of existing technologies.

The SCAQMD Governing Board adopted the 2016 AQMP on March 3, 2017 (SCAQMD 2017). CARB approved the 2016 AQMP on March 23, 2017. Key elements of the 2016 AQMP include implementing fair-share emissions reductions strategies at the federal, state, and local levels; establishing partnerships, funding, and incentives to accelerate deployment of ZE) and NZE technologies; and taking credit from co-benefits from GHG, energy, transportation and other planning efforts (SCAQMD 2017). The 2016 AQMP builds on the emissions control strategies in the 2012 AQMP and are intended to demonstrate attainment of the NAAQS for the national non-attainment pollutants ozone and PM2.5 (SCAQMD 2018).

Construction

Construction activities associated with the proposed Program have the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and loaders, and through vehicle trips

generated from worker trips and haul trucks traveling to and from the construction areas. In addition, fugitive dust emissions would result from earth moving activities. Mobile source emissions, primarily NO_X, would result from the use of construction equipment. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

Under this criterion, the SCAQMD recommends that lead agencies demonstrate that a project would not directly obstruct implementation of an applicable air quality plan and that a project be consistent with the assumptions (typically land-use related, such as resultant employment or residential units) upon which the air quality plan is based. The proposed Program would result in an increase in short-term employment compared to existing conditions. Being relatively small in number and temporary in nature, construction jobs under the proposed Program would not conflict with the long-term employment projections upon which the AQMP is based. Additionally, while new to the site, temporary construction jobs most likely are not new to the Basin with construction companies/employees moving from job site to job site once construction is completed.

Control strategies in the AQMP with potential applicability to short-term emissions from construction activities include strategies denoted in the 2012 AQMP as ONRD-04 (Accelerated Retirement of Older On-Road Heavy-Duty Vehicles) and OFFRD-01 (Extension of the Surplus Off-Road Opt-In for NO_X Provision for Construction/Industrial Equipment) and in the 2016 AQMP as MOB-08 (Accelerated Retirement of Older On-Road Heavy-Duty Vehicles) and MOB-10 (Extension of the Surplus Off-Road Opt-In for NO_X Provision for Construction/Industrial Equipment) and are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. Construction contractors would be required to comply with the CARB Air Toxic Control Measure that limits heavy duty diesel motor vehicle idling to no more than 5 minutes at any given location (California Code of Regulations [CCR] Title 13, Section 2485). In addition, contractors would be required to comply with required and applicable Best Available Control Technology (BACT) and the CARB In-Use Off-Road Diesel Vehicle Regulation to use lower emitting equipment in accordance with the phased-in compliance schedule for equipment fleet operators (CCR Title 13, Section 2449). The project would not conflict with implementation of these strategies. The project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403, which requires projects to use one or more control measures identified in the tables within the rule and may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, or other dust control strategies.

Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Because the proposed Program would not conflict with the control strategies intended to reduce emissions from construction equipment, the

proposed Program would not conflict with or obstruct implementation of the AQMP, and impacts would be less than significant.

Operations

The 2016 AQMP was prepared to accommodate growth, reduce the levels of pollutants within the areas under the jurisdiction of the SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are considered consistent with the AQMP would not interfere with attainment because this growth is included in the projections used in the formulation of the AQMP. The proposed Program represents an infrastructure project that would have no effect on long-term population and minimal employment growth. The proposed Program does not include residential or commercial development and its implementation is not forecasted to induce any additional growth within the service area. As discussed in Section 1, Project Description, the Program would include construction of stormwater capture facilities at nine City-owned parks to help capture surface flow and divert stormwater runoff from the Tujunga Wash Central Branch storm drain to recharge the groundwater basin. Therefore, the proposed Program would not conflict with growth projections in the AQMP. As the proposed Program would not conflict with the growth projections in the AQMP, impacts would be less than significant.

b) **Less than Significant Impact with Mitigation.** As indicated above, the proposed Program would be located within the Air Basin. State and federal air quality standards are exceeded in many parts of the Air Basin for O_3 and PM2.5, including those monitoring stations nearest to the proposed Program area. The proposed Program would contribute to local and regional air pollutant emissions during construction (short-term or temporary). However, based on the following analysis, construction with incorporated mitigation measures and operation of the proposed Program would result in less than significant impacts relative to the daily regional significance thresholds for criteria air pollutant emissions established by the SCAQMD for construction and operational phases.

Daily regional construction and operational source project criteria pollutant emissions (VOC, NO_X, carbon monoxide [CO], sulfur dioxide [SO_2], respirable particulate matter [PM10], and PM2.5) were estimated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2, which is designed to model construction emissions for land use development projects based on building size, land use and type, and disturbed acreage, and allows for the input of project-specific information. Proposed Program-generated emissions of criteria air pollutants (i.e., CO, SO_2, PM10, and PM2.5) and ozone precursors (i.e., VOC and NO_X) were modeled based on Program-specific information, and default SCAQMD-recommended settings and parameters attributable to the proposed land use types and site location. The model incorporates emission factors from the CARB OFFROAD model and the on-road vehicle emissions factor (EMFAC) 2014 model and is considered to be an accurate and comprehensive tool for quantifying air quality impacts from land use projects throughout California and is recommended by

the SCAQMD.[1] The emissions from worker vehicle trips, haul truck trips and vendor truck trips were estimated outside of CalEEMod to account for the CARB 2017 on-road vehicle emissions factor (EMFAC2017) model because EMFAC2017 has not yet been incorporated in the current version of CalEEMod and incorporating the light-duty vehicle adjustment factors for the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part I: One National Program (SAFE Rule Part I).[2]

The Air Basin is designated under federal or State ambient air quality standards as nonattainment for ozone, PM10, and PM2.5. It is noteworthy to mention that air quality in the Air Basin has improved substantially over the years, primarily due to the impacts of air quality control programs at the federal, state, and local levels. The ozone and PM levels have fallen significantly compared to the worst years and are expected to continue to trend downward in the future despite increases in the economy and population in the Air Basin.

Construction

Construction activities associated with the proposed Program would generate temporary and short-term emissions of VOC, NO_X, CO, SO_2, PM10, and PM2.5. Construction related emissions are expected from the site preparation, grading and excavation, paving activities, structure development, and from construction worker commutes and haul trips. Construction of the nine park projects are analyzed as occurring concurrently with the first three park renovations occurring in June 2022 and conclusion of construction activities for all parks by October 2026. With the exception of North Hollywood Park, construction of the eight other parks are anticipated to take approximately 17 to 18 months. Construction of North Hollywood Park would take approximately 24 months. If any part of project construction commences later than the anticipated start date, air quality impacts would be less than those analyzed herein, because a more energy-efficient and cleaner burning construction equipment fleet mix would be expected in the future, pursuant to state regulations that require construction equipment fleet operators to phase in less polluting heavy-duty equipment. Additionally, if construction occurs on a staggered schedule rather than assuming simultaneous construction, maximum daily emissions would be lower than analyzed herein.

The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA guidelines. Site specific construction fleet may vary due to specific park project needs at the time of construction. The duration of construction activity and associated construction equipment

[1] See: South Coast Air Quality Management District, Air Quality Modeling, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-modeling.

[2] The federal SAFE Vehicles Rule maintains the light-duty automobile and light-duty truck fuel economy and emissions standards applicable in model year 2020 for model years 2021 through 2026. California and 23 other states, environmental groups, and the cities of Los Angeles and New York, filed a petition with the U.S. Court of Appeals for the District of Columbia Circuit, for the USEPA to reconsider the published rule. The Court has not yet ruled on the lawsuit. CARB has published EMFAC2017 adjustment factors to account for the effect of this Rule, which affects model year 2020 and later light-duty automobiles and light-duty trucks.

was estimated based on consultation with the City. A detailed summary of construction equipment assumptions by phase is provided in the modeling files in **Appendix A**.

Significance of air quality impacts are determined based on daily emissions thresholds that are implemented so that the region as a whole is not adversely impacted by regional growth. The movement of soil results in both fugitive, as well as exhaust fugitive emissions. Exhaust emissions are related to the amount of equipment operating onsite at any given time. Fugitive emissions are from the movement of soils associated with excavation activities and simple equipment movement over exposed soils. Airborne pollutants are minimized through compliance with Rule 403 and other district rules adopted to reduce fugitive emissions from construction activities. Additionally, emissions disperse relatively quickly due to air movement within the Air Basin and blend into the background of the whole region, and do not just sit idle over one location. While there is a substantial amount of soil movement, the activities are spread out over a larger area (the nine parks), dispersion reduces localized emissions relatively quickly, and rules and regulations are in place to help minimize emissions. Therefore, while projects such as this Program may result in the movement of substantial amounts of soil, the emissions are limited due to the factors discussed above. Additionally, as emissions thresholds are based on daily emissions, large quantities of soil moved over numerous days reduces the daily emissions, providing another emissions limitation.

The estimated unmitigated maximum daily construction emissions are summarized on **Table AQ-1**. Under the maximum evaluated scenarios, emissions resulting from the proposed Program construction would exceed the criteria pollutant threshold for NO_X established by the SCAQMD. Table AQ-1 shows maximum daily emissions by park. Park emissions represent only the daily maximum emissions anticipated at each park. Based on the Program schedule, there is the potential for four park construction periods to overlap during the most emissions intensive phases.

Implementation of **Mitigation Measure AQ-1** would require equipment restrictions to reduce emissions of NOx to less than significance threshold. The estimated mitigated maximum daily construction emissions are summarized in **Table AQ-2**. Under the mitigated scenario, emissions resulting from the proposed Program construction would not exceed any criteria pollutant thresholds established by the SCAQMD. As such, the proposed Program's regional construction emissions impacts would be less than significant with mitigation incorporated. The SCAQMD has also provided guidance on an acceptable approach to addressing the cumulative impacts issue for air quality. Consistent with accepted and established SCAQMD cumulative impact evaluation methodologies, the potential for the proposed Program to result in cumulative impacts from regional emissions is assessed based on the SCAQMD thresholds (SCAQMD 2003a). As implementation of Mitigation Measure AQ-1 would reduce emissions to less than significance thresholds, the proposed Program would not result in a cumulatively considerable net increase of any criteria pollutant for which the proposed Program region is in non-attainment under an applicable federal or state ambient air quality standard.

TABLE AQ-1
UNMITIGATED MAXIMUM DAILY REGIONAL CONSTRUCTION EMISSIONS (POUNDS PER DAY)

Source	VOC	NO_X	CO	SO_2	PM10 [a]	PM2.5 [a]
	(lbs/day)					
Maximum Daily Emissions by Park						
Park 1: David M. Gonzales Recreation Center	5	69	48	<1	9	4
Park 2: Fernangeles Park	5	69	48	<1	9	4
Park 3: Strathern Park North	5	69	48	<1	9	4
Park 4: Whitsett Fields Park North	3	33	27	<1	7	4
Park 5: Valley Plaza Park North	4	61	41	<1	10	5
Park 6: Valley Plaza Park South	4	53	36	<1	9	5
Park 7: Alexandria Park	4	53	36	<1	9	5
Park 8A: North Hollywood Park North	4	61	41	<1	10	5
Park 8B: North Hollywood Park South	5	61	41	<1	10	5
Park 9: Valley Village Park	3	33	27	<1	7	4
Concurrent construction of 4 parks	19	281	204	60	32	16
Maximum Daily Emissions	19	281	204	60	32	16
Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	**Yes**	No	No	No	No

[a] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2020

TABLE AQ-2
MITIGATED MAXIMUM DAILY REGIONAL CONSTRUCTION EMISSIONS (POUNDS PER DAY)

Source	VOC	NO_X	CO	SO_2	PM10[a]	PM2.5[a]
	(lbs/day)					
Maximum Daily Emissions by Park						
Park 1: David M. Gonzales Recreation Center	2	44	46	<1	7	3
Park 2: Fernangeles Park	2	44	46	<1	7	3
Park 3: Strathern Park North	2	44	46	<1	7	3
Park 4: Whitsett Fields Park North	1	13	29	<1	5	3
Park 5: Valley Plaza Park North	2	41	43	<1	8	3
Park 6: Valley Plaza Park South	4	35	39	<1	7	3
Park 7: Alexandria Park	4	35	39	<1	7	3
Park 8a: North Hollywood Park - North	4	42	43	<1	8	3
Park 8b: North Hollywood Park - South	4	42	43	<1	8	3
Park 9: Valley Village Park	1	13	29	<1	5	3
Maximum Daily Emissions from Multiple Park Operations						
Standard Fleet & up to 7 Parks[a]	20	95	219	1	43	20
2014 Fleet & up to 7 Parks[a]	18	97	216	1	43	20
Maximum Daily Emissions	**20**	**97**	**219**	**1**	**43**	**20**
Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	No	No	No	No	No

NOTE: Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

a. See Mitigation Measure AQ-1g for specifics with respect to fleet and number of parks.

SOURCE: ESA, 2020

Operations

As discussed in Section 1, Project Description, the proposed Program is an infrastructure project that would include construction of stormwater capture facilities at nine City-owned parks to help capture surface flow and divert stormwater runoff from the Tujunga Wash Central Branch storm drain to recharge the groundwater basin. Operational activities associated with the proposed Program would result in air quality emissions predominantly from mobile source emissions from employees and sporadic maintenance activities as described in Section 1.7, Operation and Maintenance. Additionally, minor emissions from area sources would also occur. Combined emissions from mobile and area sources would result in 1 pound per day or less for all criteria pollutants as detailed in Appendix A. Overall, given the sporadic usage of maintenance vehicles and minimal maintenance activities, the proposed Program's operational-source emissions would not exceed applicable SCAQMD regional thresholds of significance. As such, operation of the project would result in a less than significant impact.

Mitigation Measures

AQ-1: Construction of the Program shall incorporate the following conditions:

a. For all parks: The Program shall use off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater and not identified under b or c. below. Such equipment will be outfitted with Best Available Control Technology (BACT) devices, including a CARB-certified Level 3 Diesel Particulate Filter or equivalent. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment.

b. All dumpers/tenders used on-site shall either be certified Tier 3 with a CARB-certified Level 3 Diesel Particulate Filter or equivalent; certified Tier 4 with a CARB-certified Level 3 Diesel Particulate Filter or equivalent, or alternatively fueled (e.g., gasoline, electric, CNG).

c. At a minimum, the following equipment shall be electric: air compressors, cement and mortar mixers, concrete saws, forklifts, pumps. Diesel generators shall be replaced with electricity from the grid either permanent or temporary, or replaced with alternative (non-diesel) fuels.

d. Equipment requirements identified under a, b, and c above shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

e. During the site clearing and preparation, grading and excavation, and soil filling, revegetation, and park improvement phases, watering

must be conducted a minimum of 4 times per day during dry weather.

f. For Valley Plaza Park North only 2 dozers are allowed to operate on any portion of the site at one time.

g. The City shall ensure:

   i. On-road haul trucks including delivery and those conveying excavated material do not exceed the following daily truck limits:

      1. 185 trucks when 2 parks are concurrently under construction;
      2. 180 trucks when 3 parks are currently under construction;
      3. 170 trucks when 4 parks are concurrently under construction;
      4. 160 trucks when 5 parks are concurrently under construction;
      5. 150 trucks when 6 parks are concurrently under construction;
      6. 140 trucks when 7 parks are concurrently under construction. Or;

   ii. If the fleet is composed of a mix of 2014 or newer trucks, the City shall ensure that on-road haul trucks including delivery and those conveying excavated material do not exceed the following daily truck limits:

      1. 240 trucks when 2 parks are concurrently under construction;
      2. 230 trucks when 3 parks are concurrently under construction;
      3. 220 trucks when 4 parks are concurrently under construction;
      4. 210 trucks when 5 parks are concurrently under construction;
      5. 200 trucks when 6 parks are concurrently under construction;
      6. 190 trucks when 7 parks are concurrently under construction.

c) **Less than Significant Impact with Mitigation.** The localized effects from the on-site portion of the emissions are evaluated at air-quality sensitive receptor locations potentially impacted by the proposed Program according to the SCAQMD's *Localized Significance Threshold Methodology*, which relies on on-site mass emission rate screening tables (SCAQMD 2008). The localized significance thresholds are applicable

to emissions of NO_X, CO, PM10, and PM2.5. For NO_X and CO, the thresholds are based on the ambient air quality standards. For PM10 and PM2.5, the thresholds are based on requirements in SCAQMD Rule 403 (Fugitive Dust) for construction and Rule 1303 (New Source Review Requirements) for operations. The SCAQMD has established conservative screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. The screening criteria depend on: (1) the source receptor area in which the project is located; (2) the size of the project site; and (3) the distance between the project site and the nearest sensitive receptor (e.g., residences, schools, hospitals). The screening criteria were utilized in this assessment. For the proposed Program, the appropriate Source Receptor Area (SRA) for the LST is the East San Fernando Valley area (SRA 7).

The nearest sensitive receptors would be the schools and residential developments within 1,000 feet of each park. Sensitive receptors for each park are as follows:

Park 1: David M. Gonzales Recreation Center: Residential receptors within 1,000 feet; Pacoima Charter school located directly north of the park; and Guardian Angel School located west of the park directly across Norris Avenue.

Park 2: Fernangeles Park: Residential receptors within 1,000 feet; and Robert H. Lewis High School and Francis Polytechnic Senior High School located approximately 700 feet to the southwest.

Park 3: Strathern Park North: Residential receptors within 1,000 feet.

Park 4: Whitsett Fields Park North: Residential receptors within 1,000 feet.

Park 5: Valley Plaza Park North: Residential receptors within 1,000 feet, Little Steps Head Start Preschool located at the southern end of the park and Bellingham Elementary located approximately 700 feet southeast of the park.

Park 6: Valley Plaza Park South: Victor Valley Child Care Center located on the Park property, residential receptors within 1,000 feet; Bellingham Elementary located approximately 340 feet northeast of the park; Little Steps Head Start Preschool located approximately 200 feet north of the park; and Roy Romer Middle school located directly across St. Claire Avenue to the east of the park.

Park 7: Alexandria Park: Residential receptors within 1,000 feet.

Park 8: North Hollywood Park: Residential receptors within 1,000 feet; The Wesley School located approximately 150 feet southeast; Oakwood Secondary School located approximately 400 feet west of the park; and Lankershim Elementary School located approximately 500 feet east.

Park 9: Valley Village Park: Residential receptors within 1,000 feet; Oakwood Secondary School located approximately 680 feet north of the park; and The Wesley School located approximately 800 feet southeast.

Since the proposed park sites are different sizes and there are no sensitive receptors within 82 feet (25 meters) of more than one park, the most conservative screening criteria in SRA 7 were used in this assessment, assuming sensitive receptors located adjacent to each park. For Parks 1, 2, and 3 screening criteria for a 2-acre park at 82 feet (25 meters) was used. For Parks 4 and 8 screening criteria for a 5-acre park at 82 feet was used; and for Parks 5, 6, 7, and 9 the screening criteria for a 1-acre park at 82 feet was used. The SCAQMD's Methodology clearly states that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." Therefore, for purposes of the LST analysis only emissions included in the CalEEMod "on-site" emissions outputs were considered.

Construction

Table AQ-3 identifies the localized impacts at the nearest receptors for each park. As seen, in Table AQ-3; PM10 and PM2.5 emissions exceed LST screening criteria for Parks 5, 6, 7 and 9. Therefore, impacts are potentially significant without mitigation.

Implementation of **Mitigation Measure AQ-1** described under Section 3.b above would reduce regional construction emissions. **Table AQ-4** summarizes the maximum LST emissions associated with implementation of the mitigation scenarios associated with **Mitigation Measure AQ-1**. With incorporation of mitigation, emissions from park construction activities would not exceed localized screening criteria. Therefore, localized impacts would be less than significant for construction.

Operations

As discussed in Section 1, Project Description, the proposed Program is an infrastructure project that would include construction of stormwater capture facilities at nine City-owned parks to help capture surface flow and divert stormwater runoff from the Tujunga Wash Central Branch storm drain to recharge the groundwater basin. Operational activities associated with the proposed Program would result in air quality emissions predominantly from mobile source emissions from new employees and maintenance activities. Additionally, minor emissions from area sources would also occur. Combined emissions from on-site sources would result in less than 1 pound per day or less for the analyzed criteria pollutant and ozone precursor emissions as detailed in Appendix A. As such, operation of the proposed Program would result in a less than significant impact.

TABLE AQ-3
UNMITIGATED MAXIMUM DAILY LOCALIZED CONSTRUCTION EMISSIONS (POUNDS PER DAY)

Source	NO_X	CO	PM10[a]	PM2.5[a]
1-acre at 82 feet				
Park 5: Valley Plaza Park North	22	21	6	4
Park 6: Valley Plaza Park South	22	21	3	2
Park 7: Alexandria Park	22	21	3	2
Park 9: Valley Village Park	22	21	3	2
Maximum Daily Localized Emissions	**22**	**21**	**6**	**4**
Significance Thresholds	**44**	**498**	**4**	**3**
Exceeds Thresholds?	No	No	**Yes**	**Yes**
2-acre at 82 feet				
Park 1: David M. Gonzales Recreation Center	27	25	4	3
Park 2: Fernangeles Park	27	25	4	3
Park 3: Strathern Park North	27	25	4	3
Maximum Daily Localized Emissions	27	25	**4**	**3**
Significance Thresholds	**63**	**786**	**7**	**4**
Exceeds Thresholds?	No	No	No	No
5-acre at 82 feet				
Park 4: Whitsett Fields Park North	22	21	6	4
Park 8a: North Hollywood Park - North	22	21	6	4
Park 8b: North Hollywood Park - South	22	21	6	4
Maximum Daily Localized Emissions	**22**	**21**	**6**	**4**
Significance Thresholds	**96**	**1,434**	**14**	**8**
Exceeds Thresholds?	No	No	No	No

[a] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2020

CO "Hotspot" Analysis

A CO hotspot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. Projects may worsen air quality if they increase the percentage of vehicles in cold start modes by 2 percent or more; significantly increase traffic volumes (e.g., by 5 percent or more) over existing volumes; or worsen traffic flow, defined for signalized intersections as increasing average delay at intersections operating at Level of Service (LOS) E or F or causing an intersection that would operate at LOS D or better without the project, to operate at LOS E or F. Based on the most recent air quality monitoring data for the nearest and most geographically representative monitoring station located at 18330 Gault St, Reseda CA 91702, CO concentrations for the last 3 years (i.e., 2017–2019) have ranged from 2.6 to 3.4 parts per million (ppm) for the CO 1-hour averaging period and 2.1 to 2.5 ppm for the CO 8-hour averaging period, with similar levels recorded at other monitoring stations in the Air Basin

(SCAQMD 2020). The NAAQS and CAAQS for CO are 35 ppm and 20 ppm for the CO 1-hour averaging period and 9 ppm and 9.0 ppm for the CO 8-hour averaging period. Thus, based on monitoring data, CO levels continue to be well below the NAAQS and CAAQS.

TABLE AQ-4
MITIGATED MAXIMUM DAILY LOCALIZED CONSTRUCTION EMISSIONS (POUNDS PER DAY)

Source	NO_X	CO	PM10[a]	PM2.5[a]
1-acre at 82 feet				
Park 5: Valley Plaza North	2	23	3	2
Park 6: Valley Plaza Park South	4	23	1	1
Park 7: Alexandria Park	4	23	1	1
Park 9: Valley Village Park	2	23	1	1
Maximum Daily Localized Emissions	**3**	**23**	**3**	**2**
Significance Thresholds	**44**	**498**	**4**	**3**
Exceeds Thresholds?	No	No	No	No
2-acre at 82 feet				
Park 1: David M. Gonzales Park	3	23	3	2
Park 2: Fernangeles Park	3	23	3	2
Park 3: Strathern Park	3	23	3	2
Maximum Daily Localized Emissions	**3**	**23**	**3**	**2**
Significance Thresholds	**63**	**786**	**7**	**4**
Exceeds Thresholds?	No	No	No	No
5-acre at 82 feet				
Park 4: Whitsett Fields Park North	2	23	4	2
Park 8a: North Hollywood Park - North	4	23	4	2
Park 8b: North Hollywood Park - South	4	23	4	2
Maximum Daily Localized Emissions	**3**	**23**	**4**	**2**
Significance Thresholds	**96**	**1,434**	**14**	**8**
Exceeds Thresholds?	No	No	No	No

[a] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2020

The SCAQMD conducted CO attainment demonstration modeling for the 2003 AQMP. In the 2003 AQMP CO attainment demonstration, the SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day (SCAQMD 2003b). This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions (i.e., excluding background concentrations) at the most congested intersection in the Air Basin was 4.6 ppm (1-hour average) and 3.2 ppm (8-hour average)

at Wilshire Boulevard and Veteran Avenue.[3] The modeling showed that CO hotspots would not occur at this most congested intersection in the Air Basin.

While construction-related traffic on the local roadways would occur during construction, the net increase of construction worker vehicle and construction haul trips to the existing daily traffic volumes on the local roadways would not result in CO hotspots. The proposed Program, assuming overlapping construction across all nine parks, would add up to a maximum of approximately 474 trucks per day and could travel on any major roadway at any given park during construction of the proposed Program. This is equal to up to approximately 59 trucks in an hour. The temporary addition of up to 474 trucks per day (474 inbound and 474 outbound truck trips per day) or 59 trucks per hour (59 inbound and 59 outbound truck trips per hour) during overlapping construction activities, which would travel on various different roadways in the vicinity of each of the nine parks, would not substantially, affect CO hotspot concentrations at any one roadway intersection. Additionally, the construction-related vehicle trips would only occur in the short-term, and would cease once construction activities have been completed for each proposed park project. The analysis for construction is based on the maximum number of trucks, although with implementation of Mitigation Measure AQ-1, daily trucks would be limited to reduce NOx emissions; therefore, further reducing CO emissions at intersections. During operation, only minimal emissions would be generated from vehicle trips for periodic inspection and maintenance purposes. The proposed Program is not expected to cause any additional vehicle or truck trips other than limited and periodic maintenance trips. Therefore, impacts would be less than significant.

Toxic Air Contaminants

Concentrations of toxic air contaminants (TACs) are also used as indicators of ambient air quality conditions. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

Construction

Construction activities associated with the proposed Program would result in temporary and short-term emissions of diesel particulate matter, which the State has identified as a TAC. During construction, the exhaust of off-road heavy-duty diesel equipment would emit diesel particulate matter during general construction activities, such as site preparation excavation, stormwater capture installation, pump station/electrical installation, site finishing.

[3] The 8-hour average is based on a 0.7 persistence factor, as recommended by the SCAQMD.

As discussed in detail in Section 2.9 Hazards, preliminary testing at Strathern Park has indicated that lead, vanadium, and DDT exceed the Regional Water Quality Control Board environmental screening levels due to previously deposited fill materials, which include asphaltic concrete, concrete, brick, bottles glass, ceramic, plastic, and tires. The proposed project would excavate the site down to 13 feet. Soil excavation and remediation would comply with SCAQMD Rules 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) and 1466 (Control of Particulate Emissions from Soils with Toxic Air Contaminants) to prevent contamination of the stormwater and the release of TACs into the environment. As required in Mitigation Measure HAZ-3, the proposed Program's adherence to all applicable federal, state, and local regulations would ensure air quality impacts related to the previously deposited fill materials at the Strathern Park North site would be less than significant.

Diesel particulate matter poses a carcinogenic health risk that is generally measured using an exposure period of 30 years for sensitive residential receptors, according to the California Environmental Protection Agency, Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA Guidance), which was updated in 2015 with new exposure parameters including age sensitivity factors (OEHHA 2015). Sensitive receptors would be located adjacent to all of the park project sites.

A health risk analysis was conducted in accordance with OEHHA and SCAQMD methodology to determine the potential impacts of construction related diesel particulate matter emissions on the nearby sensitive receptors. Modeling assigns risk to all sensitive receptors within 1,000 feet of each proposed park, and takes into account any receptors that would be impacted by construction at more than one park.[4] Maximum unmitigated emissions are shown in **Table AQ-5**. As shown, unmitigated emissions exceed regulatory thresholds of 10 in one million for cancer risk. The risk shown in Table AQ-5 is the cumulative risk for the construction of all parks on all receptors. As the distance from the receptors increases, the influence of the construction on those receptors diminishes, for this reason the maximum risk is not simply the sum of the maximum risk from the individual parks.

[4] While there are school receptors located within 1,000 feet of the parks, because the length of construction for each park is less than 2 years and the schools are located within wider communities where students live, the risk for school sites were conservatively modeled as residential receptors.

TABLE AQ-5
UNMITIGATED HEALTH RISK

Park	Cancer Risk	Hazard Index
Park 1: David M. Gonzales Recreation Center	44	0.14
Park 2: Fernangeles Park	72	0.21
Park 3: Strathern Park North	**162**	0.47
Park 4: Whitsett Fields Park North	20	0.06
Park 5: Valley Plaza Park North	16	0.07
Park 6: Valley Plaza Park South	41	0.21
Park 7: Alexandria Park	9	0.03
Park 8a: North Hollywood Park - North	11	0.05
Park 8b: North Hollywood Park - South	10	0.07
Park 9: Valley Village Park	21	0.10
Max Cumulative	**163**	**0.47**
Threshold:	**10**	**1**
Exceed Threshold?	**Yes**	No

NOTE:
1. The risk for each park represents the maximum risk on any one receptor from the given park.
2. The maximum cumulative risk is the maximum risk from the construction of all parks on any given receptor.

SOURCE: ESA 2020

Implementation of **Mitigation Measure AQ-1** would result in a decrease in risk, as shown in **Table AQ-6**. As shown, with the implementation of **Mitigation Measure AQ-1**, maximum cumulative risk from the construction of all parks is reduced to below regulatory thresholds. Therefore, impacts from TAC emissions associated with construction activities are less than significant.

TABLE AQ-6
MITIGATED HEALTH RISK

Park	Cancer Risk	Hazard Index
Park 1: David M. Gonzales Recreation Center	3	0.01
Park 2: Fernangeles Park	5	0.02
Park 3: Strathern Park North	**9**	0.03
Park 4: Whitsett Fields Park North	4	0.01
Park 5: Valley Plaza Park North	1	<0.01
Park 6: Valley Plaza Park South	3	0.01
Park 7: Alexandria Park	1	<0.01
Park 8a: North Hollywood Park - North	1	<0.01
Park 8b: North Hollywood Park - South	1	0.01
Park 9: Valley Village Park	2	0.01
Max Cumulative	**9**	**0.03**
Threshold:	**10**	**1**
Exceed Threshold?	No	No

NOTES:
1. The risk for each park represents the maximum risk on any one receptor from the given park.
2. The maximum cumulative risk is the maximum risk from the construction of all parks on any given receptor.

SOURCE: ESA 2020

Operations

The proposed Program would not require new unpermitted stationary equipment. The proposed Program would not result in any other substantial sources of operational TAC emissions. Therefore, the proposed Program would not expose surrounding sensitive receptors to net new long-term TAC emissions and impacts would be less than significant.

Mitigation Measures

Implement **Mitigation Measure AQ-1**.

d) **Less than Significant Impact.** Potential sources that may emit odors during construction activities include construction equipment exhaust, the application of asphalt, and the use of architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. SCAQMD Rule 1108 and Rule 1108.1 limits the VOC content of asphalt, which would minimize odor emissions from paving activities. Further, construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction. Through adherence with mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create objectionable odors.

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The proposed Program does not have any uses matching any of the listed categories. Therefore, the proposed Program would not generate odors affecting a substantial number of people and impacts would be less than significant.

References

Office of Environmental Health Hazard Assessment, 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. Available at: http://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0. Accessed June 2020.

South Coast Air Quality Management District (SCAQMD, 1993). CEQA Air Quality Handbook. 1993, p. 6-1.

SCAQMD, 2003a. Cumulative Impacts White Paper, Appendix D. Available at: http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4. Accessed June 2020.

SCAQMD, 2003b. 2003 AQMP, Appendix V: Modeling and Attainment Demonstrations, August 2003, pp. V-4 through V-24.

SCAQMD. 2005. Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. May 06. Available online at: https://www.aqmd.gov/home/research/guidelines/planning-guidance/guidance-document. Accessed June 2020.

SCAQMD. 2006. Final – Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds. October. Available online at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/particulate-matter-(pm)-2.5-significance-thresholds-and-calculation-methodology/final_pm2_5methodology.pdf. Accessed June 2020.SCAQMD, 2008a. Final Localized Significance Threshold Methodology. Available at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed June 2020.

SCAQMD. 2008b. MATES III Report, 2008. Available online at: http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-iii/mates-iii-final-report. Accessed June 2020.

SCAQMD, 2013. Final Air Quality Management Plan. Available at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan. Accessed June 2020.

SCAQMD. 2015. Final Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, ES-2, 2-11, 6-1. Available online at: https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-iv. Accessed June 2020.SCAQMD, 2017. Final 2016 Air Quality Management Plan. March 2017. Available at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/aqmp-archive. Accessed June 2020.

SCAQMD. 2018. *NAAQS/CAAQS and Attainment Status for South Coast Air Basin*. September. Available online at: http://www.aqmd.gov/home/air-quality/clean-air-plans. Accessed June 2020.

SCAQMD. 2020a. Air Quality Modeling. Available online at: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-modeling. Accessed June 2020.

SCAQMD, 2020b. Historical Data by Year. http://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year. Accessed July 2020.

2.4 Biological Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
BIOLOGICAL RESOURCES — Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion

On September 18, 2019, ESA senior biologist Travis Marella conducted a field reconnaissance at four City-owned parks, David M. Gonzales Recreation Center, Fernangeles Park, Strathern Park North, and Whitsett Fields Park North. On October 4, 2019, Pax Environmental (Pax) biologist Colleen Del Vecchico conducted a field reconnaissance at five City-owned parks, Valley Plaza Park North, Valley Plaza Park South, Alexandria Park, North Hollywood Park, and Valley Village Park. The entirety of each of the nine parks were surveyed for sensitive biological resources, including areas where special-status species could potentially occur, based on a September 2019, nine-USGS quadrant search of the California Natural Diversity Database (CNDDB). The biologists walked each of the nine parks to characterize and map biological resources. All incidental observations of flora and fauna, including sign of wildlife presence (e.g., scat, tracks, burrows, and vocalizations) were noted during the assessment. The results of the field reconnaissance visits were compiled into the *Biological Resources Technical Report (BTR) for the Stormwater Capture Parks Program, Los Angeles, Los Angeles County, California* (ESA, 2019), included as **Appendix B**. The analysis presented in this section is based on the BTR.

a.) **Less than Significant Impact with Mitigation.** During the field reconnaissance, biologists characterized and mapped plant communities, disturbed/developed areas, and

recorded observations/detections of plants and wildlife species, including special-status species. A thorough discussion of the existing biological conditions, including potentially occurring special-status species and sensitive plant communities, is contained in the BTR.

A review of the California Natural Diversity Database (CNDDB) (CDFW 2019) revealed that 47 special-status wildlife species and 50 special-status plant species have been previously recorded in the Program region. However, based on absence of suitable habitat at the nine project park sites (all nine parks are developed and/or disturbed), as well as known geographic distributions and/or range restrictions, it was determined that there is a low to very low potential for special-status wildlife species and no potential for special-status plant species to be present at any of the nine City-owned parks, with one exception as described below. The results of the CNDDB and a California Native Plant Society (CNPS 2019) queries are provided in Appendix B. Several wildlife species common to developed areas, including urban parks, were observed during the biological surveys. A complete list of the wildlife species observed during the surveys is also provided in Appendix B.

Special-Status Plants

One Southern California black walnut tree (*Juglans californica*), a California Rare Plant Rank 4 species, was observed at North Hollywood Park, growing within a eucalyptus stand, outside the development area. Based on the level of disturbed condition of the nine parks and the absence of suitable habitat for supporting special-status plant species, it is determined that no special-status plants have the potential to occur at the nine parks that encompass the proposed project, with the exception of Southern California black walnut. The potential removal of one Southern California black walnut would not have a substantial adverse effect because the plant is isolated from other trees of the same species and does not contribute to the genetic diversity of the species.

Special-Status Wildlife

One special-status wildlife species, Cooper's hawk (*Accipiter cooperii*), a California Species of Special Concern, was observed at both Valley Plaza Park South and North Hollywood Park. This special-status species is expected to forage on passerine species and rodents within the parks and may nest within trees located within any of the proposed park project sites.

Based on the level of disturbance/development at each of the nine parks and overall lack of suitable habitat, no other special-status wildlife species have a moderate or high potential to occur on-site. While bats may use California sycamore (*Platanus racemosa*) trees to roost, special-status bat species, including hoary bat (*Lasiurus cinereus*) and silver-haired bat (*Lasionycteris noctivagans*), have low potential to occur within any of the proposed park project locations, since the sites are situated in an urban environment with constant ambient nighttime lighting (e.g., street lights, ball field lights).

The only special-status species with potential to occur within the proposed project areas is the Cooper's hawk, which was observed at two park project locations. Construction activities within the nine park project sites would not have a substantial adverse effect on any other special-status species, since all of the sites are highly disturbed with manicured turf grass, playgrounds, and ball fields and are regularly used by people for recreation. Common species adapted to urban environments expected to occur include raccoon (*Procyon lotor*), Virginia opossum (*Didelphis virginiana*), eastern fox squirrel (*Sciurus niger*), and various resident and migratory bird species. **Mitigation Measure BIO-1** would ensure that impacts to special-status species would be less considered less than significant.

In-Channel Wildlife Resources

The diversion facilities would be constructed within existing storm drains or concrete-lined channels. No aquatic or riparian habitats exist within the storm drains or channels that could be adversely affected by installation of infrastructure. The City would be required to obtain a Streambed Alteration Agreement from the CDFW pursuant to Section 1602 of the California Fish and Game Code and a Clean Water Act Section 404 permit from the US Army Corps of Engineers prior to installing the diversion infrastructure.

The Program would divert dry weather flow and stormwater that otherwise would proceed downstream through concrete channels to the concrete-lined Los Angeles River. The Los Angeles River conveys stormwater runoff from the ULARA watershed to the ocean. Habitat values in the Los Angeles River are minimal, including some areas of native vegetation in the Arbor Reach where the channel is soft bottomed. No sensitive aquatic species including native fish species currently occupy the Los Angeles River. The Arbor Reach does support cottonwood and black willow forests that rely on perennial flows in the river from upstream treated wastewater reclamation plant discharges, urban runoff, and surficial groundwater expression as a result of shallow bedrock. The reduction in dry weather flow to the Los Angeles River resulting from the proposed Program is not expected to affect riparian or aquatic habitat in the channel since sufficient dry weather flow currently exists all the way to the ocean, including the Arbor Reach. Annual channel streamflow in the Arbor Reach is 96,852 AFY during the summer and 210,479 AFY annually. The proposed project will divert up to 3,010 AFY, about 1.4 percent of annual streamflow. Similarly, reduction in storm flow that is currently conveyed to the ocean would not affect wildlife in the river. The capture of stormwater for groundwater recharge in the upper watershed is closer to the pre-development condition where storm flow peaks were reduced through natural infiltration. Furthermore, the Program would reduce the pollutant load, including metals, pathogens, and trash that would otherwise flow into downstream receiving waters. Therefore, impacts to in-channel and downstream wildlife resources would be less than significant.

Mitigation Measure

BIO-1: Special-Status Wildlife Species. Construction activities at any of the nine park project sites could result in impacts to the Cooper's hawk, a California Species of Special Concern, where mature trees are present. Similarly, construction activities may also impact other nesting bird species that may nest in a variety of vegetation as well as man-made structures. Construction activities should occur outside of the avian nesting season. If the avian nesting season cannot be avoided and construction or vegetation removal occurs from February 1 to September 1, the project shall implement the following to avoid and minimize impacts to nesting birds and raptors:

- During the avian breeding season, a qualified biologist shall conduct a preconstruction avian nesting survey no more than 7 days prior to vegetation disturbance or ground-disturbing activities. If construction begins in the non-breeding season and proceeds continuously into the avian nesting season, no surveys are required. However, if there is a break of 7 days or more in construction activities during the nesting season, a new nesting bird survey shall be conducted before construction begins again.
- The preconstruction survey shall cover all reasonably potential nesting locations on and within 100 feet of the construction areas. A 300-foot radius shall be surveyed in areas containing suitable habitat for nesting raptors, such as trees and utility poles.
- If an active nest is found during the preconstruction avian nesting survey, a qualified biologist shall designate a suitable buffer for all passerine birds and raptor species. The nest site area shall not be disturbed until the nest becomes inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, and the young will no longer be impacted by the project. Buffer areas may be increased upon recommendation of a qualified biologist if any endangered, threatened, California Fully Protected, or California Species of Special Concern are identified during preconstruction surveys.
- If the nest(s) are found in an area where ground disturbance is scheduled to occur, the City or its contractor shall avoid the area by delaying ground disturbance in the area until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

b) **No Impact**. Sensitive natural communities are those that are considered by the California Department of Fish and Wildlife (CDFW) to be imperiled due to their decline in the region and/or their ability to support special-status plant and/or wildlife species. These communities include those that, if eliminated or substantially degraded, would sustain a significant adverse impact as defined under CEQA. Sensitive natural communities are important ecologically because their degradation and destruction could threaten populations of dependent plant and wildlife species and significantly reduce the regional distribution and viability of the community. Loss of sensitive natural communities also can remove or reduce important ecosystem functions, such as water filtration by wetlands or bank stabilization by riparian woodlands. All nine park project locations are disturbed/developed and consist of manicured grass, non-native grasses, and weedy plant

species. There are no sensitive natural communities or riparian habitats found within the Program area.

A review of the most recent CNDDB (CDFW 2019) records revealed a list of nine sensitive natural communities known to occur in the vicinity of the proposed project: California Walnut Woodland, Riversidian Alluvial Fan Sage Scrub, Southern California Arroyo Chub/Santa Ana Sucker Stream, Southern Coast Live Oak Riparian Forest, Southern Cottonwood Willow Riparian Forest, Southern Mixed Riparian Forest, Southern Sycamore Alder Riparian Woodland, Southern Willow Scrub, and Valley Oak Woodland. None of these sensitive natural communities or riparian habitats are found at any of the park project sites. No other sensitive natural communities, as defined by CDFW, were identified on the project sites and there is no riparian habitat present; therefore, no impact would occur to a sensitive natural community.

c) **Less than Significant Impact.** The Central Branch of the Tujunga Wash, a concrete-lined channel, is located on the western boundary of Valley Plaza Park South, Alexandria Park, and North Hollywood Park. From the tributary areas of these parks, stormwater flows into this wash. No aquatic or riparian habitats exist within the channel that could be adversely affected by installation of infrastructure. The City would be required to obtain a Streambed Alteration Agreement from the CDFW pursuant to Section 1602 of the California Fish and Game Code and a Clean Water Act Section 404 permit from the US Army Corps of Engineers prior to installing the diversion infrastructure. In accordance with Section 401 of the CWA, projects that apply for a Section 404 permit for discharge of dredged or fill material must also obtain water quality certification from the appropriate RWQCB indicating that the proposed project would uphold Clean Water Act water quality standards.

The Program would divert dry weather flow and stormwater that otherwise would proceed downstream via concrete channels to the concrete-lined Los Angeles River. The Los Angeles River conveys stormwater runoff from the ULARA watershed to the ocean. Habitat values in the Los Angeles River are minimal, including some areas of native vegetation in the Arbor Reach where the channel is soft bottomed. According to the Los Angeles River Ecosystem Restoration Study (USACE 2013), there are 181 wildlife species that have the potential to occur within the upper Los Angeles River watershed. Documented wildlife include seven fish species (one of which is native; the western mosquitofish [*Gambusia affinis*]), four amphibian species, seven reptile species, 139 bird species, and 24 mammal species. No sensitive aquatic species including native fish species currently occupy the Los Angeles River. The Arbor Reach does support cottonwood and black willow forests that rely on perennial flows in the river from upstream wastewater discharges and groundwater upwelling. Cooper's hawk and yellow warbler (*Setophaga petechia*) have been reported from this riparian habitat downstream near Griffith Park. In addition, least Bell's vireo *(Vireo bellii pusillus)* has also been reported from black willow forests within the Arbor Reach of the Los Angeles River. The reduction in dry-weather flow to the Los Angeles River resulting from the proposed Program would not affect riparian or aquatic habitat in the channel since sufficient

dry-weather flow currently exists (46 percent of annual flows) to create sufficient dry-weather flows all the way to the ocean. Similarly, reduction in storm flow that is currently conveyed to the ocean, including the arbor reach, would not affect wildlife in the river.

The proposed Program would have the capacity to divert about 3,010 AFY from the combined nine park project sites (see **Table BIO-1**). This volume would be diverted over the course of a year during both dry weather and during storm events. USACE estimated that existing water sources provide 211,348 AFY of flow within the Los Angeles River watershed on an annual basis. The proposed diversion would be approximately 1.4 percent of the existing water source. In addition, USACE also calculated that 97,722 AFY (46 percent) of that total source water, flows to the Los Angeles River watershed during the summer months of April through September (dry season).

The Los Angeles River currently discharges an average of over 100 cubic feet per second (cfs) to the ocean during dry weather (City of Los Angeles 2018). The volume of water diverted during dry weather flow by the proposed Program would be a small percentage of the current downstream flows (1.4 percent), and no beneficial uses would be impacted. Furthermore, since urbanization has increased impermeable surfaces, the capture of stormwater for groundwater recharge in the upper watershed would help to reduce storm flow peaks through natural infiltration. The proposed Program improves the storm flow hydrograph, reducing high flow peaks caused by the hardened urban landscape with impermeable surfaces.

TABLE BIO-1
PROPOSED ANNUAL DIVERSION

Park	Acre Feet per Year (AFY) Diversion
David M. Gonzales Recreation Center	448.2
Fernangeles Park	201.8
Strathern Park North	225.4
Whitsett Fields Park North	185.1
Valley Plaza Park North	397.5
Valley Plaza Park South	157.9
Alexandria Park	71.7
North Hollywood Park (A and B)	1,150.2
Valley Village Park	172.1
TOTAL	**3,009.9**

Finally, the proposed Program would improve downstream water quality (EWMP 2015). The natural treatment provided by infiltration through the soils of the vadose zone would minimize impacts to groundwater quality from nutrients, organic compounds, pathogens and other contaminants found in stormwater. In addition, the proposed Program would comply with the requirements of the MS4 Permit issued by RWQCB. The reduced load of metals, pathogens, and trash resulting from the upstream diversions would improve

downstream water quality and, as a result, downstream habitat conditions could benefit from the proposed Program's removal of contaminants and pollutants, potentially through the River terminus at the ocean. Impacts to in-channel and downstream wildlife resources would be less than significant.

d) **Less than Significant Impact with Mitigation.** Wildlife movement corridors are areas where regional wildlife populations regularly and predictably move during dispersal or migration. Movement corridors in California are typically associated with ridgelines, valleys, rivers, and creeks supporting riparian vegetation. Movement corridors link together areas of suitable wildlife habitat that are otherwise separated by rugged terrain, changes in vegetation, by human disturbance, or by the encroachment of urban development. Movement corridors are important as the combination of topography and other natural factors, in addition to urbanization, has fragmented or separated large open space areas.

Each park is situated adjacent to highly disturbed urban development consisting of residential neighborhoods, commercial and industrial businesses, busy roadways, and SR 170. As such, the nine parks that encompass the proposed project are not within, or adjacent to, a wildlife movement corridor.

No wildlife movement corridors are present in the vicinity of any of the park project sites and no impacts would occur.

Migratory and Nesting Birds

Migratory birds may utilize the proposed park sites, including but not limited to trees, vegetation, and building structures for foraging and breeding purposes. Several inactive nests were observed during the biological resource reconnaissance. In order to avoid direct impacts to nesting birds during the nesting bird season, and to ensure compliance with the federal Migratory Bird Treaty Act and the California Fish and Game Code protecting nesting birds, **Mitigation Measure BIO-1** would be implemented. With implementation of **Mitigation Measure BIO-1**, impacts would be considered less than significant.

Mitigation Measure

Implement **Mitigation Measure BIO-1**.

e) **Less than Significant Impact.** The City of Los Angeles Tree Protection Ordinance (No.177404) protects any of the following Southern California native tree species measuring 4 inches or greater in trunk diameter at 4.5 feet above ground level:

- Oaks trees including valley oak (*Quercus lobata*) and California [coast] live oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the scrub oak (*Quercus dumosa*)
- Southern California black walnut (*Juglans californica* var. *californica*)

- California Sycamore (*Platanus racemosa*)
- California bay laurel (*Umbellularia californica*)

These trees are protected from relocation or removal within the City limits. Relocation and removal includes any act that will cause a protected tree to die, including but not limited to acts that inflict damage upon the root system or other parts of the tree by fire, application of toxic substances, operation of equipment or machinery, or by changing the natural grade of the land by excavation or filling within the drip line of the canopy. Any work activities that either directly (pruning, removal) or indirectly (grade alteration) impact protected trees within their drip line require a permit to be issued by the Urban Forestry Division.

In addition, the RAP Tree Preservation Policy protects native and non-native trees. Their policy provides protection to urban forest trees within parks beyond the protections regulated by the City of Los Angeles Tree Protection Ordinance. This policy regulates protection of heritage, special habitat value, or common park trees. The definitions of each are included below:

- Heritage trees are individual trees of any size or species that are specifically designated as heritage because of their historical, commemorative, or horticultural significance. Heritage trees are protected trees. The Heritage Trees List can be obtained from RAP Griffith Maintenance/Forestry Division. Before a Heritage tree is pruned, damaged, relocated, or removed, recommendations from RAP staff arborists must be obtained. The forestry arborist makes a recommendation to the General Manager for removal. The General Manager or designee must make the final approval before the tree can be removed.
- Special habitat value trees are protected trees and include big leaf maple (*Acer macrophyllum*), boxelder (*Acer negundo*), toyon (*Heteromeles arbutifolia*), California walnut (*Juglans californica*), northern California black walnut (*Juglans hindsii*), California sycamore (*Platanus racemosa*), hollyleaf cherry (*Prunus ilicifolia*), Catalina cherry (*Prunus lyonii*), Fremont cottonwood (*Populus fremontii*), black cottonwood (*Populus trichocarpa*), sandbar willow (*Salix exigua*), red willow (*Salix laevigata*), pacific willow (*Salix lasiandra*), arroyo willow (*Salix lasiolepis*), and California bay (*Umbellularia californica*).
- Common park trees are trees that provide aesthetic, sentimental, economical, and environmental value. Every tree in City of Los Angeles parks is recognized as a valuable asset and must be protected. The Forestry Arborist may recommend removal.

The RAP Tree Preservation Policy requires that RAP Arborists provide recommendations before any heritage, special habitat value, or common park tree can be removed, relocated, or pruned. Requests to remove, relocate, or prune protected trees must be submitted to the Forestry Division. Pruning of limbs and roots must be in compliance with International Society of Arboriculture (ISA) tree pruning guidelines and under the supervision of an ISA-certified staff member (ISA 2008).

The RAP replacement policy uses the following process to determine how many replacement trees are to be planted:

> *Whenever trees are removed, the existing trees' aggregate diameter, measured at breast height (D.B.H., or 4.5-feet above the ground; multi-trunk trees are to be measured immediately below the lowest trunk) shall be replaced at an equal or greater rate of caliper of new trees. Each one-inch D.B.H. of existing tree shall be replaced with a minimum one-inch caliper new tree. Replacement trees shall have a minimum caliper of ¼-inch. For example, a single-trunk tree whose D.B.H. is 9 inches may be replaced with 36 trees of ¼-inch caliper, or with 3 trees of 3-inch caliper. This replacement ratio should represent a minimum. If the replacement ratio cannot be achieved on an individual project, it should be applied on an area-wide basis.*

All nine park project sites contain tree species protected in accordance with both the City of Los Angeles Tree Protection Ordinance and the RAP Tree Preservation Policy, including coast live oak, southern California black walnut, California sycamore, and California bay laurel. Limbs and roots of trees within the Program areas may need to be trimmed during the construction phase. Trimming of limbs or grading under the dripline of trees protected in accordance with the City of Los Angeles Tree Protection Ordinance and the RAP Tree Preservation Policy, may be considered a potentially significant impact if a tree permit is not obtained prior to trimming or dripline encroachment. Some trees may be removed as part of the proposed park projects. If work occurs in the vicinity of any protected tree, construction activities would be subject to compliance with the City of Los Angeles Tree Protection Ordinance and the RAP Tree Preservation Policy.

In order to comply with the City of Los Angeles Tree Protection Ordinance and the RAP Tree Preservation Policy, the presence of protected trees shall be considered prior to construction activities of all Program components. If a protected tree may be impacted by the Program, the City shall submit 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 and prior to obtaining a grading permit. In accordance with the RAP Tree Preservation Policy, RAP arborists shall provide recommendations before any heritage, special habitat value, or common park tree can be removed, relocated, or pruned. Requests to remove, relocate, or prune protected trees must also be submitted to the city's Forestry Division. Removed trees would be replaced on a trunk caliper size basis, 1-inch replaced to 1-inch removed. Any protected tree required to be removed would be replaced with 24-inch box trees of the same species at a ratio of 4:1.

A qualified arborist would be required to be present onsite to identify and demarcate protected trees within the proposed park project sites 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. All Program elements, including trenching paths on existing access routes, would be placed more than 10 feet from the drip lines of

protected trees in order to avoid encroachments into the root systems and any inadvertent impacts, when feasible. With adherence to local regulations, such as the City of Los Angeles Tree Protection Ordinance and the RAP Tree Preservation Policy, potential impacts to protected trees would be considered less than significant.

f) **No Impact**. The proposed Program area is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state conservation plan; therefore, no impacts would occur.

References

California Department of Fish and Wildlife (CDFW). 2019. California Natural Diversity Database (CNDDB). USGS 7.5 minute topographic quadrangles: Oat Mountain, San Fernando, Sunland, Canoga Park, Van Nuys, Burbank, Topanga, Beverly Hills, and Hollywood. Information dated September 2019.

California Department of Fish and Game (CDFG). 2006. *Fish and Game Code of California*.

California Native Plant Society (CNPS). 2019. Inventory of Rare and Endangered Plants (online edition, v7-09b). California Native Plant Society. Sacramento, CA. Accessed September 2019 from http://www.cnps.org/inventory.

California Native Plant Society (CNPS). 2001. *Botanical Survey Guidelines of the California Native Plant Society*.

City of Los Angeles. 2006. Department of Recreation and Parks Tree Preservation Policy.

City of Los Angeles, 2018. One Water LA 2040 Plan. Chapter 4. April 2018.

Environmental Science Associates (ESA). 2020. Stormwater Capture Parks Program, Biological Technical Report. June 2020.

Google Earth Pro. 2019. Aerial imagery. Accessed September 2019.

United States Army Corps of Engineers. 2013. Los Angeles River Ecosystem Restoration Feasibility Study Draft.

U.S. Fish and Wildlife Service (USFWS). 2012. Federal Endangered and Threatened Species in Los Angeles County.

U.S. Fish and Wildlife Service (USFWS). 2019a. Information for Planning and Consultation. Accessed September 2019 at https://ecos.fws.gov/ipac/.

U.S. Fish and Wildlife Service (USFWS). 2019b. Critical Habitat Portal. Accessed September 2019.

2.5 Cultural Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
CULTURAL RESOURCES — Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Discussion

The following discussion is based on *Los Angeles Department of Water and Power Stormwater Capture Parks Program, City of Los Angeles, CA - Cultural Resources Assessment* (Vader and Lockwood, 2020), included as confidential **Appendix C**. The assessment included a records search at the South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton; a review of the SurveyLA findings for the Arleta-Pacoima, North Hollywood-Valley Village, and Sun Valley-La Tuna Canyon Community Plan Areas; a California Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search; review of historic and geologic maps, and historic aerial photographs; desktop geoarchaeological review; and cultural resources survey.

a) **Less than Significant Impact with Mitigation.** The cultural resources assessment identified three historic architectural resources within the Program area. These resources include: the David M. Gonzales Recreation Center featuring a clubhouse building dating to the park's period of significance of 1950 located approximately 65 feet from the Program construction footprint; North Hollywood Park featuring a maintenance building and pool house (65 feet and 100 feet from the Program construction footprint, respectively) and the North Hollywood Branch Library (located 100 feet from the Program construction footprint) dating to the park's period of significance of 1928–1931; and the 170 Freeway Pedestrian Overpass connecting Valley Plaza Park North and Whitsett Fields Park North located approximately 90 feet from a proposed diversion structure in Valley Plaza Park North. The North Hollywood Branch Library is National Register of Historic Places (NRHP)-listed and, therefore qualifies as a historical resource. SurveyLA indicates that the David M. Gonzales Recreation Center, as well as the maintenance building and pool house associated with North Hollywood Park appear eligible for listing in the NRHP and California Register of Historical Resources (CRHR) under Criteria A/1 and C/1 (NRHP Status Codes 3S and 3S2) and are eligible for local listing under Criteria 1 and 3 (NRHP Status Code 5S3). SurveyLA indicates that the 170 Freeway Pedestrian Overpass is eligible for local listing under Criteria 1 and 3 (NRHP Status Code 5S3). As such, these historic architectural resources all qualify as historical resources under CEQA. Because the proposed Program's ground disturbance would occur within open space portions of the nine parks, and do not overlap the

identified historical resources, no direct or indirect impacts to known historical resources are anticipated. However, should the Program's design elements change and Program components are placed in closer proximity to these historical resources, they could be directly impacted through ground-borne vibrations or be subject to indirect visual impacts. As such, the Program could cause a substantial adverse change in the significance of known historical resources should design elements change. Implementation of **Mitigation Measure CUL-1** would reduce potential impacts to known historical resources in the event Program components are placed in closer proximity to these resources.

No archaeological resources were identified within the proposed Program area as a result of the SCCIC records search conducted on September 26, 2019 and cultural resources surveys conducted on November 6, 2019 and May8, 2020. Therefore, no impacts to known archaeological resources that qualify as historical resources are anticipated. Based on the results of the desktop geoarchaeological study, the Program area is underlain by Holocene-age sediments that have high sensitivity for the presence of buried archaeological deposits. These Holocene-age deposits are overlain by disturbed soils associated with urban development. The soils were identified as undocumented fill during Program-related geotechnical testing, occurring between the surface and varying depths generally ranging from 0.5 to 5 feet below the ground surface. The majority of the parks contain depths of fill occurring no deeper than 5 feet, though one park (Strathern Park North) contains undocumented fill to a depth of 13 feet. Given the disturbed nature of the undocumented fill identified within the nine parks, it is unlikely that they would contain intact archaeological deposits and, therefore, have low sensitivity. However, beyond the layers of undocumented fill, the subsurface archaeological sensitivity is high. Depths of proposed Program excavation at each park includes the following: 17 feet bgs at Strathern Park North; 18 feet bgs at Fernangeles Park; 25 feet bgs at Whitsett Park North and Alexandria Park; 26 feet bgs at Valley Plaza Park North, Valley Plaza Park South, and North Hollywood Park; 29 feet bgs at David M. Gonzales Recreation Center; and 30 feet bgs at Valley Village Park. Thus, excavations at each park would extend beyond undocumented fill and intrude into native soils where subsurface archaeological deposits may be encountered. As such, there is potential for Program-related ground disturbance to encounter buried archaeological resources that qualify as historical resources beyond the layers of undocumented fill. Should archaeological resources qualifying as historical resources be encountered during construction, the Program could cause a substantial adverse change in the significance of a historical resource. Implementation of **Mitigation Measures CUL-2 through CUL-5** would reduce potential impacts to unknown archaeological resources qualifying as historical resources to less than significant.

Mitigation Measures

CUL-1: In the event Program designs are further refined and individual park project components change to encroach more closely than 50 feet to the North Hollywood Branch Library (P-19-167303), the pool house and maintenance building associated with North Hollywood Park, the clubhouse associated with the David M. Gonzales Recreation Center, and/or the 170 Freeway Pedestrian Overpass, the City shall retain

a qualified architectural historian meeting the Secretary of the Interiors Standards for Architectural History to review design plans for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards). Should potential Program redesign not conform to the Standards, the City shall work with the qualified architectural historian to mitigate impacts to these resources. Should Program redesign place Program components within 50 feet of these resources, the qualified architectural historian shall also assess potential construction-related impacts resulting from ground-borne vibration. Should ground-borne vibrations have the potential to impact the historical resources, the City and the qualified architectural historian shall develop a plan to monitor ground-borne vibration during construction to ensure it does not exceed thresholds that could damage, or otherwise alter the historical resources.

CUL-2: Prior to the start of ground-disturbing activities, the City shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (U.S. Department of the Interior, 2008) to carry out the following cultural resources mitigation measures.

CUL-3: Prior to start of ground-disturbing activities, the qualified archaeologist shall prepare a cultural resources sensitivity training module to be used as part of the City's Worker Environmental Awareness Program (WEAP) training. All construction personnel shall receive sensitivity training prior to beginning work onsite. Construction personnel should be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. The City should ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

CUL-4: Prior to the start of any project-related ground-disturbing activities, the qualified archaeologist shall prepare a Cultural Resources Monitoring Plan (CRMP) in consultation with Tribes that requested consultation under AB52. The CRMP shall stipulate the location and timing of archaeological and Native American monitoring, which shall include all ground-disturbing activities in each of the nine parks that exceed the depths of undocumented fill as documented by geotechnical testing. The qualified archaeologist shall review engineering plans for each of the nine parks to determine where ground-disturbing activities will exceed the depths of undocumented fill at each park to determine the timing and locations of monitoring to be included in the CRMP. The CRMP shall include monitoring protocols to be carried out during Program-related construction. The CRMP shall stipulate that Native American monitors associated with any of the Tribes that have been consulted with under AB52 be retained to monitor Program-related ground disturbance stipulated in the CRMP.

The CRMP shall contain an allowance that the Qualified Archaeologist, based on observations of subsurface soil stratigraphy or other factors during initial grading, and in coordination with the Native American monitor(s) and the City, may reduce or discontinue monitoring as warranted if it is determined that the possibility of encountering archaeological deposits is low. The CRMP shall outline the appropriate measures to be followed in the event of unanticipated discovery of cultural resources during Program implementation, including that all ground disturbance within 100 feet of an unanticipated discovery shall cease until a treatment plan is developed by the

qualified archaeologist in coordination with the City and the Native American monitor(s) and which will consider the resources archaeological and tribal value. The CRMP shall identify avoidance as the preferred manner of mitigating impacts to cultural resources. The CRMP shall establish the criteria utilized to evaluate the significance (per CEQA) of the discoveries, methods of avoidance consistent with *CEQA Guidelines* Section 15126.4(b)(3), as well as identify the appropriate treatment to mitigate the effect of the Program if avoidance of a significant resource is determined to be infeasible. The CRMP will also include provisions for the treatment of archaeological sites that qualify as unique archaeological resources pursuant to Public Resources Code Section 21083.2, which places limits on the costs of mitigation for unique archaeological resources. The plan shall also require the preparation of a monitoring report following the completion. The monitoring report will be submitted to the City for review and comment and a final copy will be filed at the SCCIC. The CRMP shall be submitted to the City and the appropriate Native American representatives who have been consulted with under AB52 for review prior to the start of Program-related ground disturbance.

CUL-5: In the event of the unanticipated discovery of archaeological materials during Program implementation, all work shall immediately cease in the area (within approximately 100 feet) of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has conferred with the City and the Native American monitors on the significance of the resource.

If it is determined that the discovered archaeological resource constitutes a significant resource, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with the City and Native American monitors that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The City shall consult the appropriate Native American representatives in determining treatment and disposition for prehistoric or Native American resources to ensure cultural values ascribed to the resource beyond those that are scientifically important are considered.

b) **Less than Significant Impact with Mitigation**. As noted above under Section 2.5 (a) no known archaeological resources were identified within the park project sites as a result of the cultural resources assessment prepared for the Program. The geoarchaeological review indicates that Holocene-age sediments underlie varying depths of fill which generally range from the surface to depths of 0.5–5 feet deep, though one park (Strathern Park North) contains undocumented fill to a depth of 13 feet. These Holocene-age sediments have high sensitivity for the presence of buried archaeological resources. Thus, there is the potential for Program-related ground disturbance to encounter buried archaeological resources that qualify as unique archaeological resources beyond the layers of undocumented fill. Should archaeological resources qualifying as unique

archaeological resources be encountered during construction, the Program could cause a substantial adverse change in the significance of a unique archaeological resource. Implementation of **Mitigation Measures CUL-2 through CUL-5** would reduce potential impacts to unknown archaeological resources qualifying as unique archaeological resources to less than significant.

Mitigation Measures

Implement **Mitigation Measures CUL-2 through CUL-5**.

c) **Less than Significant Impact with Mitigation**. No known formal or informal cemeteries or other burial places are known to exist within the Program area. However, because the proposed Program would involve ground-disturbing activities, it is possible that such actions could unearth, expose, or disturb previously unknown human remains. Implementation of **Mitigation Measure CUL-6** would reduce potential impact to unknown human remains to less than significant.

Mitigation Measures

CUL-6: If human remains are encountered, all work shall halt in the vicinity (within 100 feet) of the find and the Los Angeles County Coroner shall be contacted in accordance with 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 will be notified in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by Assembly Bill 2641). The NAHC will designate a Most Likely Descendent (MLD) for the remains per PRC Section 5097.98. Until the landowner has conferred with the MLD, the City shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.

References

U.S. Department of the Interior. 2008. Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (As Amended and Annotated), www.nps.gov/history/local-law/arch_stnds_0.htm, 2002.

Vader, Michael and Chris Lockwood. 2020. LADWP Stormwater Capture Parks Program, City of Los Angeles, CA – Cultural Resources Assessment. Prepared for the Los Angeles Department of Water and Power by Environmental Science Associates.

2.6 Energy

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
ENERGY — Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** The analysis below includes the proposed Program's energy requirements and energy use efficiencies by fuel type for each stage of the proposed Program (construction and operations).

Construction

The proposed Program would consume energy during construction activities, primarily from on- and off-road vehicle fuel consumption in the form of diesel and gasoline, necessary to implement the stormwater capture facilities at nine City-owned parks.

The estimated fuel usage for off-road equipment is based on the number and type of equipment that would be used during construction activities, hour usage estimates, the total duration of construction activities, and hourly equipment fuel consumption factors from the California Air Resources Board (CARB) OFFROAD model as embedded in the California Emission Estimator Model (CalEEMod), which was used in the proposed Program's air quality analysis. On-road vehicles would include trucks to haul material to and from the park project sites, vendor trucks to deliver supplies necessary for the proposed Program construction, and fuel used for employee commute trips. Lighting, and other processes associated with grid electricity, would be provided using generator sets running on diesel fuel. Therefore, the proposed Program is not projected to consume electricity during construction. Construction activities, typically do not involve the consumption of natural gas. **Table E-1** summarizes the proposed Program's total and yearly fuel consumption from construction activities.

TABLE E-1
SUMMARY OF FUEL CONSUMPTION DURING PROJECT CONSTRUCTION

Fuel Type	Quantity (gallons)
Gasoline	
On-Road Construction Equipment	112,180
Off-Road Construction Equipment	0
Total Gasoline	**112,180**
Diesel	
On-Road Construction Equipment	1,294,998
Off-Road Construction Equipment	702,637
Total Diesel	**1,997,535**
Project Length	**4.5 years**
Annual Average Gasoline Use	**24,949**
Annual Average Diesel Use	**443,897**

SOURCE: ESA, 2020

The petroleum-based fuel use summary provided above in Table E-1 represents the amount of transportation energy that could potentially be consumed during construction of all nine park projects and is based on a conservative set of assumptions, provided in Appendix A. As shown on Table E-1, on- and off-road vehicles would consume an estimated 112,180 gallons of gasoline and approximately 1,997,535 gallons of diesel fuel throughout the proposed Program's construction. For comparison purposes, the fuel usage during proposed Program construction would represent approximately 0.001 percent of the 2018 annual on-road gasoline-related energy consumption and 0.80 percent of the 2018 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix A.

The proposed Program's construction contractors would comply with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy duty diesel on- and off-road equipment. CARB adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling time in order to reduce public exposure to diesel particulate matter and other toxic air contaminants. CARB approved the Truck and Bus regulation to reduce NO_X, PM10, and PM2.5 emissions from existing diesel vehicles operating in California. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models.

While intended to reduce construction criteria pollutant emissions, compliance with the CARB anti-idling and emissions regulations would also result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. According to the CARB staff report that was

prepared at the time the anti-idling ATCM was being proposed for adoption in late 2004/early 2005, the regulation was estimated to reduce non-essential idling and associated emissions of diesel particulate matter and NO_X emissions by 64 percent and 78 percent, respectively, in analysis year 2009.

These reductions in emissions are directly attributable to overall reduced idling times and fuel combustion as a result of compliance with the regulation. Heavy-duty engines continue to become more efficient and reduction amounts may lessen in the future due to this. Although the energy savings cannot be accurately quantified, the proposed Program would still reduce consumption of diesel fuel under the anti-idling measure. Thus, construction of the proposed Program would use energy necessary to implement the stormwater capture facilities at nine City-owned parks, but would not result in the wasteful, inefficient, and unnecessary use of energy and impacts would be less than significant.

Operations

Operational energy consumption would result in electricity consumption as well as on-road diesel and gasoline usage. The stormwater collection systems would require energy for on-site operations. In addition, periodic maintenance activities which would involve a few trucks or vehicles bi-month. **Table E-2** summarizes the proposed Program's yearly electrical and fuel consumption from operational activities.

TABLE E-2
SUMMARY OF FUEL CONSUMPTION DURING PROJECT CONSTRUCTION

Fuel Type	Quantity
Gasoline	1,945 gallons
Diesel	740 gallons
Electricity	505,400 kWh

SOURCE: ESA, 2020

The petroleum-based fuel use summary provided in Table E-2 represents the amount of transportation energy that would be consumed during operations of all nine park projects and is based on a conservative set of assumptions, provided in Appendix A. As shown, vehicles would consume an estimated 1,945 gallons of gasoline and approximately 740 gallons of diesel fuel annually for maintenance activities. For comparison purposes, the fuel usage during the proposed Program's operations would represent less than 0.001 percent of the 2018 annual on-road gasoline-related energy consumption and approximately 0.001 percent of the 2018 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix A.

Electrical consumption during operational activities of the nine park projects would result in the consumption of 505,400 kWh of electricity annually. For comparison purposes, electrical consumption during operations would represent approximately 0.002 percent of LADWP's 2018 electricity sales as shown in Appendix A. In addition, new solar photovoltaic panels would be installed along the top of the new carport, and up to four

new electric vehicle supply equipment stations would be added to the parking area of the David M. Gonzales Recreation Center. The solar panels would be expected to provide approximately 35 kilowatt DC of capacity which would offset some of the proposed park project's electrical usage. The battery energy-storage system associated with the solar panels would provide energy to critical loads during emergency blackouts.

The proposed Program's related diesel fleet would comply with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy duty diesel on- and off-road equipment as well as the anti-idling regulations. These would reduce fuel consumption associated with the CARB adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling time in order to reduce public exposure to diesel particulate matter and other toxic air contaminants. Thus, operation of the stormwater capture facilities at nine City-owned parks would require the use of necessary energy but would not result in the wasteful, inefficient, and unnecessary use of energy and the proposed Program's impacts would be less than significant.

b) **Less than Significant Impact.** Construction and operation of the proposed Program would not result in an increase in demand for natural gas. As stated, the proposed Program's energy consumption primarily would result from on- and off-road fuel use from construction related vehicles. The proposed Program is an infrastructure project that once constructed would contribute limited operational related energy consumption as detailed under Section 2.6 (a) above. Therefore, the proposed Program's burden on energy demand would be minimal and would not result in a need for increased supply or distribution infrastructure capabilities. Further, the increase in energy consumption is minimal compared to LADWP's annual sales. Also, the proposed Program would comply with all regulations applicable to the construction and operation of the proposed Program to reduce energy consumption. Therefore, impacts would be less than significant.

References

California Air Resources Board, Proposed Regulation Order: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, Appendix A, 2004. Available at https://ww3.arb.ca.gov/regact/idling/isorappf.pdf. Accessed July 2020.

California Energy Commission, 2018 California Annual Retail Fuel Outlet Report Results (CEC-A15) Energy Assessments Division, 2020. Available at: https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting. Accessed July 2020.

LADWP. 2018. 2018 Retail Electric Sales and Demand Forecast, 2018.

2.7 Geology and Soils

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
GEOLOGY AND SOILS — Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Discussion

The discussion in this section is based on individual geotechnical and soil assessments conducted on each site by the City. The paleontological resources discussion is based on *Los Angeles Department of Water and Power Stormwater Capture Parks Program, City of Los Angeles, CA - Paleontological Resources Assessment* (Shapiro, 2020), included as confidential **Appendix D**. The assessment included a records search conducted by the Los Angeles County Natural History Museum (LACM) and a geologic map and literature review.

a.i) **Less than Significant Impact**. The Alquist-Priolo Earthquake Fault Zoning Act requires the delineation of zones along active faults in California. The proposed Program would be located across three quadrangles as established by the California Geological Survey (CGS): the Burbank Quadrangle, the Van Nuys Quadrangle, and the San Fernando Quadrangle (CGS 1998, 1999a, 1999b). According to the CGS, the proposed project would not be located within an Alquist-Priolo Earthquake Fault Zone. The nearest potentially active fault mapped in accordance with the Alquist-Priolo Earthquake Fault

Zoning Act is the Verdugo Fault, located approximately 0.62 mile southwest of the David M. Gonzales Recreation Center (Hart 1978). In addition, the proposed Program would be required to be constructed in accordance with the current CBC and local earthquake standards and safety codes. With adherence to all applicable regulations, and the use of earthquake resistant materials to construct the stormwater capture system, impacts resulting from rupture of a known earthquake fault at the project area would be considered less than significant.

a.ii) **Less than Significant Impact.** As with all of Southern California, the project area is located in an area known for seismic activity, and has the potential to experience strong ground shaking. The nearest fault to the proposed Program is the Verdugo Fault line, located 0.62 mile southwest of the David M. Gonzales Recreation Center as discussed above. A major earthquake associated with an active fault could result in moderate to severe ground shaking in the project area and would be a potential hazard. Damage to the proposed underground stormwater capture system could be expected as result of ground shaking during a seismic event. As such, the City will utilize earthquake resistant materials when constructing the stormwater capture system, known to withstand seismic activity. In addition, the proposed Program would be required to be constructed in accordance with the current CBC and local earthquake standards and safety codes. With adherence to all applicable regulations, and the use of earthquake resistant materials to construct the stormwater capture system, impacts resulting from seismic ground shaking at the project area would be considered less than significant.

a.iii) **Less than Significant Impact with Mitigation.** Liquefaction is the rapid loss of shear strength experienced in saturated, predominantly granular soils below the groundwater level during strong earthquake groundshaking and occurs due to an increase in pore water pressure. Liquefaction-induced lateral spreading is defined as the finite, lateral displacement of gently sloping ground as a result of pore-pressure buildup or liquefaction in a shallow underlying deposit during an earthquake (VT 2013). The occurrence of this phenomenon is dependent on many complex factors, including the intensity and duration of groundshaking, particle-size distribution, and density of the soil.

The potential damaging effects of liquefaction include differential settlement, loss of ground support for foundations, ground cracking, heaving and cracking of structure slabs due to sand boiling, and buckling of deep foundations due to ground settlement. Dynamic settlement (i.e., pronounced consolidation and settlement from seismic shaking) may also occur in loose, dry sands above the water table, resulting in settlement of and possible damage to overlying structures. In general, a relatively high potential for liquefaction exists in loose, sandy soils that are within 50 feet of the ground surface and are saturated (below the groundwater table). Lateral spreading can move blocks of soil, placing strain on levees and roads that can lead to ground failure.

According to the CGS Seismic Hazard Zoning Program, the Program is located in areas that are designated liquefaction zones, specifically, North Hollywood Park, Valley Village Park, Alexandria Park, and Valley Plaza Park South (CGS 1999a, 1999b, 1999c).

These designations are likely based on the historical high groundwater levels. As discussed below under Section 2.10 (d), groundwater levels beneath all of the Program sites have decreased to below at least 66 feet in depth in response to decades of regional groundwater pumping (Geosyntec 2020a, b, c, d; Ninyo & Moore 2020f, g, h, i, j). However, as discussed in the geotechnical reports, the recharge of stormwater could cause localized groundwater mounding that could increase the potential for liquefaction on sandy layers that are less than 50 feet in depth. To mitigate for potential liquefaction, as well as other groundwater mounding issues, the geotechnical consultant recommended the implementation of **Mitigation Measure GEO-1**, discussed below.

With implementation of all recommendations described in the Geotechnical Reports and **Mitigation Measure GEO-1**, impacts related to liquefaction damage would be reduced to less than significant.

Mitigation Measures

GEO-1: The City shall implement the recommendations provided in the geotechnical investigations for each of the park project sites. In the event that the depth to groundwater rises to less than 50 feet bgs as measured in nearby wells, the stormwater infiltration process shall be stopped and the stormwater routed to the surface storm drain system until groundwater depths decrease to below 50 bgs.

a.iv) **No Impact.** According to the CGS Seismic Hazard Zones, no landslide areas exist within the project area (CGS 1999a, 1999b, 1999c). The Program areas are relatively flat. Once constructed, the stormwater capture system would be contained mainly underground and aside from the park improvements, the above ground setting would return to pre-Program conditions. Therefore, the proposed Program would not expose people or structures to a landslide hazard. No impact would occur.

b) **Less than Significant Impact.** During construction of the proposed Program, grading and excavation activities would expose and disturb surface soils. Soil exposed by construction activities could be subject to erosion if exposed to heavy rain, winds, or other storm events. However, the proposed project would require an NPDES General Storm water Permit Associated with Construction Activities, as the proposed Program would disturb at least 1 acre of soil. A Program-specific Storm Water Pollution Prevention Plan (SWPPP) would be prepared in compliance with the Construction General Permit. The SWPPP would identify erosion control and sediment control BMPs that would be implemented to minimize the occurrence of soil erosion or loss of topsoil. Once construction is completed, the proposed Program impact areas would be returned to pre-project conditions and no stockpiles would remain within the project areas. Therefore, impacts associated with erosion of soils would be considered less than significant.

c) **Less than Significant Impact with Mitigation.** As discussed above, a geotechnical investigation report was prepared for each project site to identify potential geotechnical

issues. Each geotechnical report discusses the geologic characteristics and their potential to result in landslide, lateral spreading, liquefaction, subsidence, or collapse.

Liquefaction and lateral spreading are analyzed above in Section 2.7 (a.iii), which concluded the impact would be less than significant with mitigation with implementation of **Mitigation Measure GEO-1**.

Subsidence is the gradual settling of the ground surface with little to no horizontal movement, which can be caused by many factors such as fluid (i.e., oil or groundwater) extraction, mining operations, or karst terrain. The project does not include the extraction of groundwater or oil and therefore could not cause subsidence. Collapsible soil is most commonly observed in sediments that are loosely deposited, separated by coatings or particles of clay or carbonate, then subject to saturation. None of the parks have loosely deposited sediments and would therefore not be susceptible to collapse.

Mitigation Measure

Implement **Mitigation Measure GEO-1**.

d) **Less than Significant Impact.** Expansive soils are defined as soils possessing clay particles that react to moisture changes by shrinking when dry or swelling when wet. Each geotechnical report prepared for the individual parks all included investigation into the potential for expansive soils. All of the reports indicate that there were no observed expansive soils observed at each of the park project sites. Additionally, compliance with the CBC and local codes would ensure that the project components would be designed to include technical specifications to minimize impacts due to expansive soils, including but not limited to removal, proper fill selection, and compaction of expansive soils. Therefore, impacts due to expansive soils are considered to be less than significant.

e) **No Impact.** The proposed Program would not include the installation or use of septic tanks or alternative wastewater disposal systems. Therefore, no construction or operational impacts associated with septic tanks or alternative wastewater disposal systems would occur.

f) **Less than Significant Impact with Mitigation.** Geologic mapping indicates Holocene-aged (11,700 years ago to present) younger alluvium (Qa) is mapped at the surface within the Program area. These younger alluvial deposits are likely underlain by Pleistocene-age (2,580,000 to 11,700 years ago) older alluvium and marine sediments at depths ranging from 5 to 20 feet below the ground surface. Holocene-age sediments younger than 5,000 years before present are typically too young to contain fossils considered to be significant paleontological resources; however, older Holocene age sediments and Pleistocene-age sediments are of appropriate age to contain paleontological resources.

The LACM records search did not identify any fossil localities within the Program area; however, a number of fossil localities were identified in the Program area's vicinity from similar alluvial deposits as those underlying the Program area. Fossil localities were

identified near Van Norman Reservoir, approximately 6.25 miles northwest of the Program area, which produced fossil specimens of bison, mastodon, mammoth, and horse in surficial and underlying alluvium to depths of 75 feet below the surface; approximately 1 mile northeast of the Program area, which produced fossil specimens of mastodon, horse, and camel from depths of 160 to 170 feet below the surface; near Sepulveda Dam Recreation Area approximately 4 miles west of the Program area, which produced fossil specimens of peccary, camel, and bison at depths 20 to 100 feet below the surface; and a location located approximately 4.3 miles west of the Program area produced fossils of extinct horse at a depth of 14 feet.

Based on the results of the paleontological resources assessment, the Program area has low to high paleontological sensitivity increasing with depth. The Holocene-age alluvium mapped at the surface has low paleontological sensitivity and is presumed to be underlain by Pleistocene age alluvium, which has high paleontological sensitivity, at depths exceeding 15 feet below the ground surface. Proposed Program ground disturbance would extend to depths ranging from 16 to 29 feet below the ground surface and have the potential to intrude into paleontologically sensitive alluvium below 15 feet deep. Should fossiliferous deposits be encountered during construction, Program implementation could directly or indirectly destroy a paleontological resource or unique geologic feature. Implementation of **Mitigation Measures GEO-2 through GEO-5** would reduce potential impacts paleontological resource or unique geologic features to less than significant.

Mitigation Measures

GEO-2: Prior to the start of construction activities, the City shall retain a Qualified Paleontologist that meets the standards of the Society of Vertebrate Paleontology (2010) to carry out all mitigation measures related to paleontological resources.

GEO-3: Prior to start of any ground-disturbing activities, the Qualified Paleontologist shall contribute to any construction worker cultural resources sensitivity WEAP training materials outlined in Mitigation Measure CUL-2, either in person or via a training module provided to the Qualified Archaeologist. This training shall include information on what types of paleontological resources could be encountered during excavations, what to do in case an unanticipated discovery is made by a worker, and laws protecting paleontological resources. All construction personnel shall be informed of the possibility of encountering fossils and instructed to immediately inform the construction foreman or supervisor if any fossils are unexpectedly unearthed in an area where a paleontological monitor is not present. The City shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

GEO-4: The Qualified Paleontologist shall supervise a paleontological monitor meeting the Society for Vertebrate Paleontology standards (2010) who shall be present during all excavations exceeding 15 feet. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. Monitoring can be reduced to part-time inspections or ceased entirely

if determined adequate by the Qualified Paleontologist in consultation with the City. Monitoring activities shall be documented in a Paleontological Resources Monitoring Report to be prepared by the Qualified Paleontologist at the completion of construction and shall be provided to the City and filed with the Natural History Museum of Los Angeles County within 6 months of Program completion.

GEO-5: If a unique geologic feature or paleontological resource is discovered during construction, the paleontological monitor shall be empowered to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established by the Qualified Paleontologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Qualified Paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing and evaluation of the find. All significant fossils shall be collected by the paleontological monitor and/or the Qualified Paleontologist. Collected fossils shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Los Angeles County Natural History Museum, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

References

California Geologic Survey (CGS), 1999a. *Earthquake Zone of Required Investigation: Burbank Quadrangle*. Available at: https://gmw.conservation.ca.gov/SHP/EZRIM/Maps/BURBANK_EZRIM.pdf. Accessed July 6, 2020.

CGS, 1998. *Earthquake Zone of Required Investigation: Van Nuys Quadrangle*. Available at: https://gmw.conservation.ca.gov/SHP/EZRIM/Maps/VAN_NUYS_EZRIM.pdf. Accessed July 6, 2020.

CGS, 1999b. *Earthquake Zone of Required Investigation: San Fernando Quadrangle*. Available at: https://gmw.conservation.ca.gov/SHP/EZRIM/Maps/SAN_FERNANDO_EZRIM.pdf. Accessed July 6, 2020.

Geosyntec Consultants, 2020a. *Draft Soils Investigation Report, Task Order Solicitation No. 25, Stormwater Capture Parks Program, North Hollywood Park*. June 2.

Geosyntec Consultants, 2020b. *Draft Soils Investigation Report, Task Order Solicitation No. 25, Stormwater Capture Parks Program, Valley Plaza Park North*. June 3.

Geosyntec Consultants, 2020c. *Draft Soils Investigation Report, Task Order Solicitation No. 25, Stormwater Capture Parks Program, Valley Plaza Park South*. June 3.

Geosyntec Consultants, 2020d. *Draft Soils Investigation Report, Task Order Solicitation No. 25, Stormwater Capture Parks Program, Alexandria Park*. June 3.

Hart, Earl W., 1978. *California Division of Mines and Geology Fault Evaluation Report FER-74 San Fernando (Olive View & North Olive View faults), Los Angeles County,* April 5.

Ninyo and Moore, 2020f. *Geotechnical Evaluation, LABOE TOS No. 25, Stormwater Capture Parks Program, Valley Village Park*. May 28.

Ninyo and Moore, 2020g. *Geotechnical Evaluation, LABOE TOS No. 25, Stormwater Capture Parks Program Strathern Park North*, June 26.

Ninyo and Moore, 2020h. *Geotechnical Evaluation, LABOE TOS No. 25, Stormwater Capture Parks Program Whitsett Fields Park North*. June 26.

Ninyo and Moore, 2020i. *Geotechnical Evaluation, LABOE TOS No. 25, Stormwater Capture Parks Program Fernangeles Park*. June 30.

Ninyo and Moore, 2020j. *Geotechnical Evaluation, LABOE TOS No. 25, Stormwater Capture Parks Program David M. Gonzales Recreation Center*. July 2.

LADWP Stormwater Capture Parks Program, City of Los Angeles, CA – Paleontological Resources Assessment. Prepared for the Los Angeles Department of Water and Power by Environmental Science Associates.

Society of Vertebrate Paleontology (SVP). 2010. *Standard Procedures for the assessment and mitigation of adverse impacts to paleontological resources*.

Virginia Polytechnic Institute and State University (Virginia Tech [VT]). 2013. *Liquefaction-Induced Lateral Spreading.*

2.8 Greenhouse Gas Emissions

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
GREENHOUSE GAS EMISSIONS — Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in patterns of temperature, wind, precipitation as well as storm frequency and intensity. Historical records indicate that the global climate has varied in the past due to natural phenomena; however, current data increasingly indicates that the current global conditions differ from past climate changes in both rate and magnitude. Global climate change attributable to anthropogenic (human) GHG emissions is currently one of the most important scientific, economic, and political issues in the United States and the world. The Intergovernmental Panel on Climate Change (IPCC), in its *Fifth Assessment Report, Summary for Policy Makers*, stated that, "it is extremely likely that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in greenhouse gas concentrations and other anthropogenic forcings together."

Certain gases in the earth's atmosphere, classified as GHGs, play a critical role in regulating the earth's surface temperature. A portion of the solar radiation that enters the earth's atmosphere is absorbed by the earth's surface, and a smaller portion of this radiation is reflected back toward space. This infrared radiation (i.e., thermal heat) is absorbed by GHGs within the earth's atmosphere. As a result, infrared radiation released from the earth that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the "greenhouse effect," is responsible for maintaining a habitable climate on the earth, and providing stable conditions for life to flourish.

GHGs, which are present in the atmosphere naturally, are generated by natural and anthropogenic sources, and are also formed from secondary chemical reactions taking place in the atmosphere. Natural sources of GHGs include the respiration of animals and plants, decomposition of organic matter, and outgassing from the oceans. Anthropogenic sources include the combustion of fossil fuels, as well as waste treatment, industrial and agricultural processes.

The State defines GHGs as carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Not all GHGs possess the same ability to impact climate change; as a result, different GHGs

have different global warming potentials (GWPs) and CO_2 is the most common reference gas for climate change. GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e). For example, CH_4 has a GWP of 25 (over a 100-year period); therefore, 1 metric ton (MT) of CH_4 is equivalent to 25 MT of CO_2 equivalents ($MTCO_2e$). The GWP ratios used in domestic and international GHG emission inventories are available from the IPCC and are published in the Fourth Assessment Report (AR4) (IPCC 2007). By applying the GWP ratios, project-related CO_2e emissions can be tabulated in units of $MTCO_2e$ per year. Large emission sources are reported in million metric tons (MMT) of CO_2e.

According to the CalEPA, the potential impacts in California due to global climate change may include: loss in snow pack; sea-level rise; more extreme heat days per year; more high-ozone days; larger forest fires; more drought years; increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation (CalEPA 2006).

CARB compiles GHG inventories for the State. Based on the 2017 GHG inventory data (i.e., the latest year for which data are available from CARB), California emitted 424 $MMTCO_2e$ including emissions resulting from imported electrical power (CARB 2019). CARB's 2017 statewide inventory indicated that California's net GHG emissions in 2017 were 7 $MMTCO_2e$ below 1990 levels, which is the 2020 GHG reduction target codified in AB 32. The overall trends in the inventory demonstrate that the carbon intensity of California's economy is declining and has decreased by 41 percent from 2001 peak emissions while increasing the gross domestic product (GDP) by 52 percent (CARB 2019).[5] The GDP grew 3.6 percent in 2017 while emissions per GDP declined by 4.5 percent compared to 2016.

Impacts of GHGs are borne globally, as opposed to localized air quality effects of criteria air pollutants and toxic air contaminants. The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; however, it is clear that the quantity is enormous, and no single project would measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or micro climates. From the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative.

The Lead Agency, LADWP, has not adopted a numeric threshold of significance for GHG emissions that would be applicable to the proposed Program. In December 2008, the SCAQMD adopted a 10,000 $MTCO_2e$ per year significance threshold for industrial facilities for projects in which the SCAQMD is the lead agency. Although SCAQMD has not formally adopted a significance threshold for GHG emissions generated by a project for which SCAQMD is not the lead agency, or a uniform methodology for analyzing impacts related to GHG emissions on global climate change, in the absence of any industry-wide accepted standards applicable to the proposed Program, the SCAQMD's significance threshold of 10,000 $MTCO_2e$ per year for industrial projects is the most

5 Carbon intensity of California's economy is the amount of carbon pollution per million dollars of gross domestic product.

relevant GHG significance threshold and is used as a benchmark for the proposed Program. It should be noted that the SCAQMD's significance threshold of 10,000 $MTCO_2e$ per year for industrial projects is intended for long-term operational GHG emissions. The SCAQMD has developed guidance for the determination of the significance of GHG construction emissions that recommends that total emissions from construction be amortized over an assumed project lifetime of 30 years and added to operational emissions and then compared to the threshold (SCAQMD 2008).

The justification for the threshold is provided in SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans (SCAQMD Interim GHG Threshold) (SCAQMD 2008). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required. As stated by the SCAQMD:

> *"…the…screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects…the policy objective of [SCAQMD's] recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90 percent of all new or modified stationary source projects. A GHG significance threshold based on a 90 percent emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than one percent of future 2050 statewide GHG emissions target (85 [$MMTCO_2e$ per year]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control Technology (BACT)] for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility."*

Thus, based on guidance from the SCAQMD, if an industrial project would emit GHGs less than 10,000 $MTCO_2e$ per year, the project would not be considered a substantial GHG emitter and GHG emission impact would be less than significant, requiring no additional analysis and no mitigation.

CEQA Guidelines 15064.4 (b)(1) states that a lead agency may use a model or methodology to quantify GHGs associated with a project. In late 2017, the SCAQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA)

released the latest version of the CalEEMod (Version 2016.3.2). The purpose of this model is to estimate construction-source and operational-source emissions from direct and indirect sources. Accordingly, the latest version of CalEEMod has been used for the proposed Program to estimate the Program's emission impacts for all stationary and area source emissions. Mobile source emissions were modeled using EMFAC2017. All modeling and assumptions are included in Appendix A.

Construction

Construction activities associated with the proposed Program would result in emissions of CO_2 and to a lesser extent CH_4 and N_2O. Construction-period GHG emissions were quantified based on the same construction schedule, activities, and equipment list as described in Section 2.3, Air Quality and detailed in Appendix A. To amortize the emissions over the life of the project, the SCAQMD recommends calculating the total GHG emissions attributable to construction activities, dividing it by the 30-year project life, and then adding that number to a project's annual operational-phase GHG emissions. As such, construction emissions were amortized over a 30-year period. The proposed Program's construction emissions are shown in **Table GHG-1**.

TABLE GHG-1
UNMITIGATED CONSTRUCTION GREENHOUSE GAS EMISSIONS (METRIC TONS CO_2E)

Source	$MTCO_2e$
David M. Gonzales Recreation Center	4,159
Fernangeles Park	4,697
Strathern Park North	4,531
Whitsett Fields Park North	1,333
Valley Plaza Park North	1,521
Valley Plaza Park South	1,696
Alexandria Park	1,545
North Hollywood Park - A	2,150
North Hollywood Park - B	1,874
Valley Village Park	980
Total GHG Emissions	24,487
Amortized GHG Emissions	816

SOURCE: ESA, 2020

Operational Emissions

Operational activities associated with the proposed Program would result in GHG emissions from electrical consumption for system operations, increased waste generation from increased park use, minimal emissions from the use of consumer products for maintenance, and mobile source emissions from maintenance activities.

The proposed Program's construction emissions are shown in **Table GHG-2**. As shown, the combined operational and amortized construction emissions would be well below the

10,000 $MTCO_2e$ threshold, and emissions would be less than significant. Therefore, GHG emission impacts would be less than significant.

TABLE GHG-2
UNMITIGATED OPERATIONAL GREENHOUSE GAS EMISSIONS (METRIC TONS CO_2E)

Source	$MTCO_2e$
Area	<1
Energy	144
Mobile	26
Waste	37
Water	0
Total Operational:	207
Amortized Construction:	816
Total Project:	1,023
SCAQMD Numeric Indicator	**10,000**
Exceeds Threshold?	**No**

SOURCE: ESA, 2020

In addition, new solar photovoltaic panels would be installed along the top of the new carport, and up to four new electric vehicle supply equipment stations would be added to the parking area of the David M. Gonzales Recreation Center. The solar panels would be expected to provide approximately 35 kilowatt DC of capacity which would offset some of the electrical usage of the Program's use and therefore reduce GHG emissions from what was indicated in Table GHG-2. The battery energy-storage system associated with the solar panels would provide energy to critical loads during emergency blackouts.

b) **Less than Significant Impact.** Construction and operation of the proposed Program would not conflict with plans, policies or regulations adopted for the purpose of reducing the emissions of GHG as discussed below.

Construction

The primary source of GHG emissions generated by implementation of the proposed Program would occur during construction, which would be short-term and temporary in nature. The proposed Program would utilize contractors that are in compliance with regulations including the USEPA Heavy Duty Vehicle Greenhouse Gas Regulation, the CARB anti-idling Air Toxics Control Measure that limits heavy-duty diesel motor vehicle idling, and the State's low carbon fuel standard regulation. While the idling measure was adopted for the purpose of reducing diesel particulate matter emissions and reducing health risk impacts, the measure has co-benefits of minimizing GHG emissions from unnecessary truck idling. The proposed Program would not conflict with these GHG reducing measures and regulations. Therefore, impacts would be less than significant.

Operations

As discussed in Section 2.8 (a), the annual GHG emissions generated by the proposed Program would not exceed the SCAQMD's recommended threshold of 10,000 $MTCO_2e$ per year for industrial projects.

Operation of the proposed Program would generate GHG emissions from vehicles for periodic maintenance. These mobile source emissions would only add approximately 26 $MTCO_2e$ of GHG emissions annually and would have no impact on the implementation of the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to reduce GHG emissions from vehicle travel. The proposed Program would also have no net effect on long-term water consumption and associated GHG emissions from water supply, conveyance, distribution, and treatment. Electricity consumption would result in the greatest amount of operational emissions at approximately 144 $MTCO_2e$ annually. All operational activities governed by the *California Building Code* would be at least as efficient as and comply with 2019 standards. For all equipment not governed by the California Building Code, equipment would be as energy efficient as is available to reduce energy consumption. Waste disposal would comply with the recycling and reuse goals of 75 percent diversion from the land fill. For these reasons, the implementation of the proposed Program would not generate GHG emissions that would hinder the State's ability to achieve the GHG reduction goals under Health and Safety Code Division 25.5 – California Global Warming Solutions Act of 2006. Furthermore, the proposed Program would not conflict with or impede the future statewide GHG emission reductions goals. CARB has outlined a number of potential strategies for achieving the 2030 reduction target of 40 percent below 1990 levels. These potential strategies include renewable resources for half of the State's electricity by 2030, reducing petroleum use in cars and trucks, reducing the carbon content of transportation fuels, continuation of the Cap-and-Trade Program, and adopting regulations for oil refineries. The proposed Program would not conflict with these future regulations, as promulgated by the USEPA, CARB, California Energy Commission (CEC), or other agency. As a result, this impact would be less than significant.

References

CARB. 2019. California Greenhouse Gas 2000-2017 Emissions Trends and Indicators Report. Available at: https://ww2.arb.ca.gov/ghg-inventory-data. Accessed June 2020.

California Building Code. 2019 *Triennial Edition of Title 24. Available:* https://www.dgs.ca.gov/BSC/Codes.

California Environmental Protection Agency (CalEPA), 2006. Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature.

Intergovernmental Panel on Climate Change (IPCC), 2007. Changes in Atmospheric Constituents and in Radiative Forcing. In: Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the IPCC.

South Coast Air Quality Management District (SCAQMD), 2008. Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008. Available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2. Accessed February 9, 2018.

2.9 Hazards and Hazardous Materials

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
HAZARDS AND HAZARDOUS MATERIALS — Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

Discussion

a, b) **Less than Significant Impact.** Construction activities required for implementation of the proposed Program would involve ground-disturbing activities such as site clearing, grading, excavation, and installation of the stormwater capture system, park improvements and soil filling and revegetation. The proposed construction activities would require equipment that use hazardous materials such as petroleum fuels and oil. During construction activities, hazardous materials could accidentally be spilled or otherwise released into the environment exposing construction workers, the public and/or the environment to potentially hazardous conditions. Construction activities that involve hazardous materials would be regulated by several agencies, including the California Environmental Protection Agency (CalEPA), Department of Transportation (DOT), California Division of Occupational Safety and Health (Cal/OSHA), and the California Department of Toxic Substances Control (DTSC). Construction contractors would be required to implement BMPs for handling hazardous materials during construction activities, including following manufacturers' recommendations and regulatory requirements for use, storage, and disposal of chemical products and hazardous materials used in construction; avoiding overtopping construction equipment fuel tanks; routine

maintenance of construction equipment; and properly disposing of discarded containers of fuels and other chemicals. Construction contractors would be required to implement safety measures in accordance with the General Industry Safety Orders of the California Code of Regulations (CCR). Compliance with applicable federal, state, and local standards is required; therefore, construction related impacts in regards to the transport, use, or disposal of hazardous materials or accidental release of hazardous materials would be considered less than significant.

The operation of the stormwater capture systems at each park would not involve the use of hazardous fuels or the storage of any hazardous materials. Once constructed, the proposed Program would be located mostly underground and the proposed Program area would be returned to existing conditions. Maintenance activities would include monthly and bi-monthly visual inspections of the proposed Program facilities and removal of debris and pollutant buildup from the storm drain diversion as well as the HDS units, catch basins, and pre-treatment facilities. The debris and pre-treatment sludge from the HDS units and stormwater capture facility maintenance holes would be removed via a Vactor or vacuum truck and transported offsite to be disposed in compliance with applicable federal, state, and local standards, including Resource Conservation and Recovery Act, LADOT, and California Highway Patrol requirements for the containerization, labeling, transportation, and disposal of hazardous materials. Therefore, potential impacts to the public or environment through accidental release due to the routine transport, use, or disposal of hazardous materials would be less than significant.

c) **Less than Significant Impact with Mitigation.** The proposed Program would be located within nine parks throughout the City of Los Angeles. Schools are present within a one-quarter mile radius of each park are listed in **Table HAZ-1**.

TABLE HAZ-1
SCHOOLS WITHIN ONE-QUARTER MILE OF EACH PROPOSED PARK PROJECT

Park Name	School
David M. Gonzales Recreation Center	Guardian Angel School, Pacoima Charter School
Fernangeles Park	Robert H. Lewis High School, John H. Francis Polytechnic Senior High School
Strathern Park North	Byrd Middle School and John H. Francis Polytechnic Senior High School
Whitsett Fields Park North	Coldwater Canyon Elementary School, Bellingham Elementary, Little Stars Daycare
Valley Plaza Park North	Bellingham Elementary, Little Steps Head Start Preschool
Valley Plaza Park South	Concorde College and West Coast University, Bellingham Elementary, Roy Romer Middle School, Little Steps Head Start Preschool
Alexandria Park	Concorde College and West Coast University, Laurel Hall School, Kaplan College, Victory Boulevard Elementary and STEAM Magnet, Victory Elementary School, Mani Elementary School, Or Hachaim Academy, Galaxy Medical College, Computer Institute of Technology, Academy of Music and Fine Arts and the San Fernando Valley Professional School
North Hollywood Park	Lankershim Elementary School, The Wesley School, Amelia Earhart High School, North Hollywood High School, Oakwood Secondary School, Pre-K School (within the park)
Valley Village Park	Oakwood Secondary School, Valley Village Montessori School, Colfax Charter Elementary

Construction of the proposed Program would require equipment that use petroleum fuels or oil considered hazardous materials, as discussed above. Construction equipment would be contained within a designated work area within each park project site and equipment would be stored within designated staging areas overnight. Vehicle fueling would be limited to designated fueling areas outfitted with secondary containment measures in case of spill. **Mitigation Measure HAZ-1** would require the construction contractor to designate fueling areas away from a school site. Construction workers would utilize applicable BMPs and would be required to comply with existing hazardous materials laws and regulations for the transport, use and disposal of hazardous materials. As discussed in Section 2.8 (a) and 2.8 (b) above, existing regulations and safety measures would reduce public exposure to hazardous materials.

Construction of the diversion pipe along Norris Avenue for the David M. Gonzales Recreation Center would travel in front of the Pacoima Charter School. The Los Angeles Unified School District in collaboration with LADOT has designated Safe Routes to School for students and these routes could be impacted by construction of the diversion pipe along Norris Avenue. **Mitigation Measure HAZ-2** would require restrictions on construction activities along Norris Avenue to ensure safe routes to schools are maintained during the construction period. Project construction at the David M. Gonzales Recreation Center would occur across the street from the Guardian Angel School, and construction at Valley Plaza Park South would occur across the street from Roy Romer Middle School. Although no pipeline routes would impact access to the school sites, slow moving construction vehicles could impact access to and from the school sites. For these school sites, at a minimum, measures from **Mitigation Measure HAZ-2** should be implemented as needed, such as extensive outreach for the school and community, and close coordination with the school and school district.

Once constructed, the proposed Program stormwater capture facilities would be mainly underground and would not require the use or storage of hazardous materials. The proposed stormwater capture facilities would require minimal maintenance activities, none of which would involve hazardous materials. Therefore, with implementation of Mitigation Measures HAZ-1 and HAZ-2 and adherence to all applicable BMPs and federal, state, and local regulations, the proposed Program would have a less than significant impact related to handling hazardous materials within one-quarter mile of a school.

Mitigation Measure

HAZ-1: The City or its construction contractor shall ensure that fueling of vehicles or storage of fuel or other chemicals would occur at the furthest extent possible from an existing school site.

HAZ-2: For all schools located adjacent to a proposed work area, the City shall coordinate school safety routes, which should include, but not be limited to:

- Maintaining in place all crosswalks along the safe routes to and from the school (for Pacoima Charter School these would include Norris Avenue, Van Nuys Boulevard, Pierce Street, and Herrick Avenue).
- Designating a safe location for school buses and parents to drop off and pick up students.
- Designating a safe parking area for parents to wait for/pick up school children.
- Maintaining sidewalks open to pedestrian traffic during construction.
- Additional safety measures must be adopted during construction to protect the students and the public, including k-railing, secured fencing with screen, clear signing, temporary striping, and a flagger for trucks entering and existing the construction zone. Flaggers should also be considered at crosswalks while students are present.
- Close coordination with the impacted school and the Los Angeles Unified School District for input on the school safety route design and frequent communication during construction.
- Extensive outreach program for the school and the community describing safety measures and construction schedules.
- Restrict construction times to avoid before and after school timeframes while children may be walking to and from school, and while school is in session, as feasible.

d) **Less than Significant Impact with Mitigation.** Government Code Section 65962.5 requires the CalEPA to develop and annually update the Hazardous Waste and Substances Sites (Cortese) List. The information contained in the Cortese List is provided by DTSC and other state and local government agencies. A review of the DTSC EnviroStor and SWRCB GeoTracker databases did not indicate any open cleanup sites or hazardous waste facilities within the Program areas (DTSC 2020, SWRCB 2020). There are two closed LUST sites located adjacent to Whitsett Fields Park North, just north of Sherman Way and just West of Whitsett Avenue. There is one inactive cleanup program site adjacent to Alexandria Park, Klearnerette Cleaners (SWRCB 2020). These sites are inactive or closed and the project would not be located on or near any site that could pose a hazardous threat to the public or environment. Relative to the above-listed sites, impacts would be less than significant.

Five of the proposed park project sites (Fernangeles Park, Strathern Park North, Whitsett Fields Park North, Valley Plaza Park North, and Valley Plaza Park South) are located near or above known regional contamination plumes; the Valley Plaza Park North and Whitsett Fields Park North sites are located over a portion of contaminated groundwater plumes for the San Fernando Valley Superfund site (USACE 2018) and the Hewitt Landfill (Golder 2020), along the western sides of those plumes. Groundwater beneath these two Program sites have residual concentrations of perchloroethene (PCE),

trichloroethene (TCE), and 1,4-dioxane above Maximum Contaminant Levels (MCLs; also known as primary drinking water standards). However, as discussed below under Section 2.10 (d), groundwater levels beneath all of the Program sites have decreased to below at least 66 feet in depth in response to decades of regional groundwater pumping (Geosyntec 2020a, b, c, d; Ninyo & Moore 2020f, g, h, i, j). In the case of the above-listed program sites, the depths to groundwater for the nearby Hewitt Landfill were all about 250 feet or more below the ground surface in 2020 (Golder 2020). Consequently, none of the construction activities would be deep enough to encounter contaminated groundwater, if any, beneath the park project sites. Therefore, the impact of encountering contaminated groundwater during construction would be less than significant. In addition, a Hydrogeologic Impacts Evaluation Memorandum was prepared for the proposed Program in order to evaluate the potential for increased percolation at the stormwater capture sites to affect existing nearby soil and groundwater contamination, and nearby water supply and monitoring wells. The memorandum is included as **Appendix E** of this report. Stormwater capture at the proposed Program sites above or near contamination plumes is not expected to have any impact on the contamination plumes spreading or remedial facilities because the recharge volumes are relatively small compared with other factors affecting groundwater flow, including large spreading grounds, production wellfields, and remedial pumping.

Although not specifically included on the Cortese List, the City of Los Angeles requires surveys for methane for construction sites located within the City-designated methane and methane buffer zones (LADBS Bulletin P/BC 2014-101). Methane surveys were conducted for the sites listed below due to their location (Ninyo & Moore, 2020b through 2020f). **Table HAZ-2** summarizes the results of the surveys. The surveys detected methane at five sites. Based on the zone designation and detected methane concentration, the David M. Gonzales and North Hollywood Park sites would require methane mitigation design be prepared in accordance with the LADBS Municipal Ordinance No. 175790 requirements, which specifies certain design requirement based on the levels of methane (Levels I through V). The referenced Ninyo & Moore reports provide further details on the results and design requirements. With compliance with the existing City of Los Angeles methane regulations, the project design would address the presence of methane and would reduce impacts to less than significant.

TABLE HAZ-2
RESULTS OF METHANE SURVEYS AT FIVE PARK SITES

Site	Methane or Methane Buffer Zone	Maximum Methane Results in Parts per Million by Volume	Design Requirements
David M. Gonzales	Methane	15	Level I
Fernangeles	Methane Buffer	105	None Required
Whitsett Fields Park North	Methane Buffer	5.3	None Required
Valley Plaza Park North	Adjacent to Methane Buffer Zone	200	None Required
North Hollywood Park	Methane	6,150	Level IV

Although not currently listed on the lists that comprise the Cortese List, a limited Phase II investigation was conducted for the Strathern Park North site due to anecdotal evidence that the site may have been used as an undocumented landfill. The investigation verified that the site was previously used as an undocumented landfill (Ninyo & Moore 2020a). Fill materials include asphaltic concrete, concrete, brick, bottles glass, ceramic, plastic, and tires. Chemical tests indicated elevated concentrations of lead, vanadium, and DDT at concentrations above Regional Water Quality Control Board (RWQCB) Environmental Screening Levels (ESLs).[6] As required, the discovery of this undocumented landfill has been reported to the City of Los Angeles, Solid Waste Local Enforcement Agency (LEA), which must be notified of subsurface activities at locations known (or suspected) to be waste disposal sites whether they are, or are not, listed in the CalRecycle SWIS database (i.e., list of known landfills). The presence of the landfill materials and chemicals at concentrations above regulatory screening levels will require further investigation and cleanup. The proposed project would excavate the site down to 13 feet. However, the extent of the landfill materials is unknown and further testing would be necessary to assess the appropriate disposal method and prevent contamination of the stormwater to be recharged. **Mitigation Measure HAZ-3** would require completing the investigation and cleanup of the landfill site prior to construction of the project. Upon completion of the mitigation measure, the landfill materials and any potentially contaminated soil would have been removed and would no longer pose a threat of contaminating the stormwater to be recharged. Therefore, with implementation of **Mitigation Measure HAZ-3** and adherence to all applicable federal, state, and local regulations, the proposed Program would have a less than significant impact related to the landfill at the Strathern Park North site.

Mitigation Measure

HAZ-3: The City and its contractor shall conduct further investigation of the nature and extent of landfill materials and contaminated soil at the Strathern Park North site, under the oversight of the City of Los Angeles Local Enforcement Agency (LEA). Undocumented waste shall be delineated and sampled for chemicals of concern related to waste materials. The project shall avoid construction within the delineated waste mass, as feasible. If avoidance of the waste mass is not feasible, the City shall submit a work plan to the LEA that documents the results of the waste delineation, details the specifics of the construction project and how it relates to the onsite waste, describes the procedures for dealing with the waste, and outlines the environmental monitoring procedures that would be implemented during construction. Upon approval of the work plan, the City and its contractor shall remove the landfill materials and any soil with chemical concentrations above regulatory action levels to the satisfaction of the LEA and properly dispose of it at a permitted facility. An as-built report shall be submitted to the LEA after completion of the project.

e) **Less than Significant Impact.** The nearest public airports include the Whiteman Airport located adjacent to the David M. Gonzales Recreation Center and the Hollywood Burbank Airport located approximately 1.25 miles east of the project Valley Plaza Park

[6] Although developed by the RWQCB, ESLs are commonly used by regulatory agencies throughout the state to screen site and assess whether further action is needed.

North and South, and Whitsett Fields Park North sites. The project is not located within the Burbank Airport area of influence (LA County 2020). However, there is some risk for construction workers and maintenance employees working in the vicinity of an airport. There are numerous safeguards required by law to minimize the potential for and the effects from an accident if it occurs. Specifically, the Federal Aviation Administration's (FAA) airport design standards establish land use related guidelines to protect people and property on the ground by requiring the establishment of "safety zones" to keep areas surrounding the runway approach clear of habitable structures. The proposed Program would occur in an urbanized area and would not include habitable structures. Additionally, the proposed Program would not include tall structures that could violate local ordinance requirements or interfere with airport safety measures as the proposed facilities would be installed underground. Therefore, the proposed Program would result in a less than significant impact due to a safety hazard to people residing or working in the project area.

f) **Less than Significant Impact with Mitigation.** Construction of the proposed Program would require construction on roadways surrounding four of the proposed park project sites (David M. Gonzales Recreation Center, Fernangeles Park, Strathern Park, and Whitsett Fields Park North). During construction of the proposed Program, traffic could increase as a result of construction vehicles and workers entering and exiting the project site. In addition, road closures may be required during pipe installation and street improvements. Once construction is complete, traffic would return to preconstruction conditions and would not interfere with an emergency response or evacuation plan. A construction traffic management plan (CTMP) would be required for the proposed Program, as described in **Mitigation Measure TR-1** within Section 2.16 (d) below, and would ensure there would be no interference with emergency response and evacuation plans during construction activities. The CTMP would ensure that all public roads remain passable to emergency service vehicles during construction of the proposed Program or alternative routes would be clearly delineated, if needed. In addition, the CTMP would require emergency personnel be notified in advance of the proposed project schedule and any proposed road closures, including planned detour routes. Therefore, with implementation of **Mitigation Measure TR-1**, impacts would be considered less than significant.

Mitigation Measure

Implement **Mitigation Measure TR-1**.

g) **No Impact.** The proposed Program would be located within highly urban areas within the City of Los Angles, and would continue to be served by the Los Angeles Fire Department. According to the California Department of Forestry and Fire Protection (CAL FIRE), the proposed Program would not be located within a Very High Fire Hazard Severity Zone (CAL FIRE 2020). Therefore, the proposed Program would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and no impact would occur.

References

California Department of Forestry and Fire Protection (CAL FIRE). 2020. *California Very High Fire Hazard Severity Zones Viewer*. Available at: https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414. Accessed June 20, 2020.

Department of Toxic Substances Control (DTSC). 2020. EnviroStor Database. Available at https://www.envirostor.dtsc.ca.gov/public/map/?global_id=38330005. Accessed June 20, 2020.

Golder, 2020, *2020 Third Quarter Groundwater Monitoring Report, Hewitt Site, 7245-7361 Laurel Canyon Boulevard, North Hollywood, City of Los Angeles, California*, October

Los Angeles County 2020. *Airport Land Use Commission: Airport Influence Area.* Available at: http://planning.lacounty.gov/assets/upl/project/aluc_airport-burbank.pdf. Accessed June 20, 2020.

Ninyo & Moore, 2020a, *Methane Survey for Whitsett Fields Park, City of Los Angeles, Bureau of Engineering, Stormwater Capture Parks Program Project (TOS 25), Los Angeles, California*. May 4

Ninyo & Moore, 2020b, *Methane Survey for Valley Plaza Park, City of Los Angeles, Bureau of Engineering, Stormwater Capture Parks Program Project (TOS 25), Los Angeles, California*. May 15

Ninyo & Moore, 2020c, *Methane Survey for North Hollywood Park, City of Los Angeles, Bureau of Engineering, Stormwater Capture Parks Program Project (TOS 25), Los Angeles, California*. May 18

Ninyo & Moore, 2020d, *Methane Survey for Fernangeles Park, City of Los Angeles, Bureau of Engineering, Stormwater Capture Parks Program Project (TOS 25), Los Angeles, California*. June 3

Ninyo & Moore, 2020e, *Methane Survey for David M. Gonzales Park, City of Los Angeles, Bureau of Engineering, Stormwater Capture Parks Program Project (TOS 25), Los Angeles, California*. June 8

Ninyo & Moore, 2020f, *Limited Phase II Environmental Site Assessment, LABOE TOS No. 25, Stormwater Capture Parks Program, Strathern Park North, 8041 Whitsett Avenue, North Hollywood, California*. June 30.

State Water Resources Control Board (SWRCB). 2020. GeoTracker. Available at https://geotracker.waterboards.ca.gov/. Accessed June 20, 2020.

U.S. Army Corps of Engineers (USACE), 2018, *Five-Year Review Report for San Fernando Valley (Area 1) Superfund Site, North Hollywood And Burbank, Los Angeles County, California*, September 21.

2.10 Hydrology and Water Quality

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
HYDROLOGY AND WATER QUALITY — Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Discussion

a) **Less than Significant Impact.** Construction of the proposed Program would involve excavation and grading. Sediment associated with earthmoving activities and exposed soil would have the potential to erode and be transported to down gradient areas, potentially resulting in water quality standard violations. In the event of heavy rain, erosion of the stockpiles may occur resulting in scouring and sedimentation of local drainages. Additionally, stormwater passing through the construction site has the potential to pick up construction-related chemicals (such as fuels or oils from construction equipment), which may pass into the local stormwater collection system, impacting water quality. However, as required by the state General Storm water Permit Associated with Construction Activities for projects that would disturb more than one acre, the proposed Program would be required to prepare a project-specific SWPPP to minimize soil erosion. The SWPPP would identify site-specific BMPs to control erosion, sediment, and other potential construction-related pollutants. Compliance with the SWPPP would maintain water quality in accordance with the State and Regional Boards' standards such that construction of the proposed Program would not violate any water

quality standards. Therefore, implementation of the SWPPP would ensure construction would not violate water quality standards.

Once constructed, the proposed stormwater capture facilities would be contained mainly underground and proposed park project impact areas would be returned to preconstruction conditions. The proposed Program would capture stormwater and infiltrate that water into the underlying aquifer. The water would be treated prior to infiltration using an HDS unit to help separate and trap trash, debris, sediment, oils, and grease from stormwater runoff. Other pollutants, if present, are expected to be largely removed through filtration and soil aquifer treatment as the stormwater infiltrates into the subsurface and migrates through the unsaturated zone to the aquifer.

As previously discussed above in Topic 2.9(d), a Hydrogeologic Impacts Evaluation Memorandum was prepared for the proposed Program in order to evaluate the potential for increased percolation at the stormwater capture sites to affect existing nearby soil and groundwater contamination, and nearby water supply and monitoring wells. The memorandum is included as Appendix E of this report and results are summarized in this section.

Managed recharge projects can mobilize soil contamination as recharge water percolates through existing soil contamination in the unsaturated zone. However, no soil contamination was identified on eight of the nine stormwater capture park sites and, therefore, the recharge at the sites would not mobilize any known shallow soil contamination on these sites (Appendix E). As discussed in Topic 2.9(d), some soil contamination has been found at the Strathern Park North. As required by Mitigation Measure HAZ-3, this material will be removed prior to recharge activities.

As discussed above in Topic 2.9(d), five of the proposed park project sites (Fernangeles Park, Strathern Park North, Whitsett Fields Park North, Valley Park North, and Valley Park South) are located near or above known regional contamination plumes. Stormwater capture at the proposed park project sites above or near contamination plumes is not expected to have any impact on the contamination plume spreading or remedial facilities because the recharge volumes are relatively small compared with other factors affecting groundwater flow, including large spreading grounds, production wellfields, and remedial pumping (Appendix E).

The proposed stormwater retention and infiltration facilities are designed to reverse the impacts from urbanization on the natural hydrograph and water quality. The proposed Program would provide source control treatment of stormwater runoff prior to receiving waters, providing improved water quality through infiltration and treatment that would minimize the off-site transport of typical urban runoff pollutants. (EWMP 2015) The natural treatment provided by infiltration through the soils of the vadose zone would minimize impacts to groundwater quality from nutrients, organic compounds, pathogens and other contaminants found in stormwater. In addition, the proposed Program would comply with the requirements of the MS4 Permit issued by RWQCB. Therefore,

operation of the proposed stormwater capture facilities would not degrade water quality or conflict with any water quality standards or waste discharge requirements. Impacts would be less than significant.

b) **No Impact.** The proposed Program would capture stormwater and infiltrate that water into the underlying aquifer. The proposed Program would not result in any increased use or extraction of local groundwater. Instead, the proposed Program would augment groundwater supplies and increase groundwater recharge, resulting in a beneficial impact.

Several of the park sites are located near municipal water supply wells (Todd Groundwater 2020). The depths to groundwater beneath the park sites are greater than 100 feet and, in some cases, greater than 300 feet (Appendix E). Mounding associated with the Program is expected to be small due to the relatively small volumes of recharge, the large area over which the recharge is distributed and the high permeability of the subsurface materials. Mounding[7] would not be expected to result in any flooding of subsurface structures or daylighting in creeks or washes unless depth to groundwater approached 20 to 30 feet. The groundwater level rise associated with the proposed Program is expected to be on the order of 10 feet (Appendix E). This amount of mounding is considered insignificant and would not result in any negative impacts to subsurface structures or discharge to drainages near any of the proposed park project sites. Five of the proposed park project sites (Fernangeles Park, Strathern Park North, Whitsett Fields Park North, Valley Plaza Park North, and Valley Plaza Park South) are located near municipal water supply production wells. There has been a long-term trend of declining groundwater levels in the area of approximately 100 feet since 1966. Managed aquifer recharge projects, such as the proposed Program, are a means to replenish the groundwater basin, which would increase recharge to the groundwater basin. No negative impacts to water supply wells are associated with the small amount of mounding produced by stormwater capture at these park sites. Therefore, no impact would occur.

c) **Less than Significant Impact.** Construction of the proposed stormwater capture facilities would temporarily alter the localized drainage pattern in the proposed project park areas due to ground-disturbing activities, such as grading and excavation. Such alternations in the drainage pattern may temporarily result in erosion or siltation and/or increase the rate or amount of surface runoff if substantial drainage is rerouted. However, as discussed above in Section 2.10 (a), implementation of the required project-specific SWPPP would minimize the potential for erosion or siltation and flooding through the implementation of BMPs. Therefore, impacts associated with substantial erosion and temporary drainage alterations including flooding during construction would be less than significant.

Once construction is complete, the proposed park project areas would be returned to preconstruction conditions. No impervious surfaces would be added, other than some

[7] Mounding refers to the increase in groundwater elevations relative to the surrounding groundwater elevations.

paved access roads within each park project site to access maintenance holes. However, rain falling on the access roads would flow to the unpaved sides of the roads and infiltrate into the ground, as it does now. In addition, stormwater that currently flows into the existing storm drain system or to off-site areas would be captured and infiltrated on-site, which would reduce the potential for on-site or off-site erosion, siltation, or flooding. In addition, the construction of additional stormwater facilities would improve the local stormwater drainage systems, which would be a beneficial impact.

The proposed Program would have the capacity to divert 3,010 AFY. This volume would be diverted over the course of a year during both dry weather and during storm events. The Los Angeles River currently discharges an average of over 100 cubic feet per second (cfs) to the ocean during dry weather (City of Los Angeles 2018). The volume of water diverted during dry weather flow by the proposed Program would be a small percentage of the current downstream flows, and no beneficial uses would be impacted. Furthermore, the capture of stormwater for groundwater recharge in the upper watershed resembles pre-development conditions where storm flow peaks were reduced through natural infiltration. The proposed Program improves the storm flow hydrograph, reducing high flow peaks caused by the hardened urban landscape.

d) **No Impact.** The Program area is designated within Zone X, Area of Minimal Flood Hazard (FEMA 2008), and is not located within the 100-year flood zone. The Program area is located over 12 miles northeast of the Pacific Ocean. According to the City of Los Angeles General Plan, the Program area is not located in an area potentially impacted by a tsunami or inundation. There are no nearby water storage facilities, dam, or reservoir that would result in an adverse effect from a seiche. As a result, the Program area is not vulnerable to a tsunami or seiche.

Geotechnical investigations have been conducted at each of the proposed park project sites. Table **HYDRO-1** below summarizes the depths explored at park project sites, measured depths to water in nearby wells, and the geotechnical report reference. Note that groundwater was not encountered during any of the on-site investigations. Mounding associated with the proposed Program is expected to be small due to the relatively small volumes of recharge, the large area over which the recharge is distributed, and the high permeability of the subsurface materials. Mounding would not be expected to result in any flooding of subsurface structures or daylighting in creeks or washes unless depth to groundwater approached 20 to 30 feet. Groundwater modeling estimated that mounding may increase groundwater levels on the order of 10 feet. Given the current depths to groundwater of over 100 feet, this amount of mounding is considered insignificant and would not result in any negative impacts to subsurface structures or discharge to nearby drainages near any of the park sites. Therefore, no impact would occur.

TABLE HYDRO-1
GROUNDWATER EXPOLORATION AND DEPTH TO GROUNDWATER

Site	On-Site Depth Explored (feet below ground surface)	Range of Depth to Groundwater (feet below ground surface)	Reference
David M. Gonzales	51	66 to 79	Ninyo & Moore 2020j
Fernangeles	58	220 to 349	Ninyo & Moore 2020i
Strathern Park North	70½	204 to 335	Ninyo & Moore 2020g
Whitsett Fields Park North	70½	193 to 283	Ninyo & Moore 2020h
Valley Plaza Park North	50	194 to 242	Geosyntec 2020b
Valley Plaza Park South	50	194 to 242	Geosyntec 2020c
Alexandria Park	82	194 to 238	Geosyntec 2020d
North Hollywood Park	82	107 to 194	Geosyntec 2020a
Valley Village Park	76½	105 to 145	Ninyo & Moore 2020f

e) **No Impact.** The Program area is located within the San Fernando Groundwater Basin, which is one of four groundwater basins that comprise the ULARA (ULARA Watermaster 2020, Todd Groundwater 2020). The basins were first adjudicated in 1968, all water rights have been defined by a court, and all water is under the jurisdiction of the ULARA Watermaster. Under the final adjudication judgment in 1979, Los Angeles, Burbank, and Glendale each have a right to store groundwater in the basin by artificial spreading or by in-lieu activities, and to extract equivalent amounts. The proposed Program only includes artificial spreading, and does not include in-lieu agreements or the extraction of groundwater. The infiltration of surface water to recharge the aquifer would be consistent with the adjudication agreement and would not conflict with or obstruct implementation of the local water quality control plan. Because the basin is adjudicated, all water rights have been defined by a court. The court judgement established the ULARA Watermaster responsible for managing all groundwater resources of ULARA, which consist of native waters, import return waters, and stored waters as defined by the adjudication. No sustainable groundwater management plan is required for adjudicated basins. Therefore, no impact would occur.

References

City of Los Angeles, 2018. One Water LA 2040 Plan. Chapter 4. April 2018.

Federal Emergency Management Agency (FEMA), 2008. *Flood Insurance Rate Map, Map Numbers 06037C1310F and 06037C1320F*, September 26.

Geosyntec, 2020a, *Soils Investigation Report, Task Order Solicitation TOS No. 25, Stormwater Capture Parks Program, North Hollywood Park, Los Angeles, California*, June 2.

Geosyntec, 2020b, *Soils Investigation Report, Task Order Solicitation TOS No. 25, Stormwater Capture Parks Program, Valley Plaza Park North, Los Angeles, California*, June 3.

Geosyntec, 2020c, *Soils Investigation Report, Task Order Solicitation TOS No. 25, Stormwater Capture Parks Program, Valley Plaza Park South, Los Angeles, California*, June 3.

Geosyntec, 2020d, *Soils Investigation Report, Task Order Solicitation TOS No. 25, Stormwater Capture Parks Program, Alexandria Park, Los Angeles, California*, June 3.

Ninyo & Moore, 2020f, *Geotechnical Evaluation, LABOE TOS No. 25, Stormwater Capture Parks Program, Valley Village Park, 5000 Westpark Drive, North Hollywood, California*, May 28.

Ninyo & Moore, 2020g, *Geotechnical Evaluation, LABOE TOS No. 25, Stormwater Capture Parks Program, Strathern Park North, 8041 Whitsett Avenue, North Hollywood, California*, June 26.

Ninyo & Moore, 2020h, *Geotechnical Evaluation, LABOE TOS No. 25, Stormwater Capture Parks Program, Whitsett Fields Park North, North Hollywood, California*, June 26.

Ninyo & Moore, 2020i, *Geotechnical Evaluation, LABOE TOS No. 25, Stormwater Capture Parks Program, Fernangeles Park, 8851 Laurel Canyon Boulevard, Sun Valley, California*, June 30.

Ninyo & Moore, 2020j, *Geotechnical Evaluation, LABOE TOS No. 25, Stormwater Capture Parks Program, David M. Gonzales Recreation Center, 10943 Herrick Avenue, Pacoima, California*, July 7.

Upper Los Angeles River Area Watermaster (ULARA Watermaster), 2020. Upper Los Angeles River Area Watermaster Website. Available at: http://ularawatermaster.com/. Accessed July 19, 2020.

2.11 Land Use and Planning

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
LAND USE AND PLANNING — Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Discussion

a) **No Impact**. The physical division of an established community typically refers to the construction of a linear feature, such as a highway or railroad, or removal of a means of access, such as a road or bridge that would impact mobility within or between existing communities. The proposed Program, would occur mainly within parks zoned as OS. Once constructed, the proposed stormwater capture facilities would be located mostly underground. The proposed stormwater capture facilities would not create a barrier or physically divide an established community. No impact would occur.

b) **No Impact.** Land uses within the proposed Program area are under the jurisdiction of the City of Los Angeles. All of the park project sites have land use designations of OS, as designated in the City of Los Angeles General Plan and Maps (City of Los Angeles 2020). The proposed stormwater capture facilities, once constructed, would be located mainly underground and would not conflict with any applicable land use plan, policies, or regulations. Neither the zoning nor the land use designation would change as result of the proposed Program. No impact would occur.

References

City of Los Angeles, 2020. Zone Information and Map Access System (ZIMAS). Available at: http://zimas.lacity.org/. Accessed April 20, 2020.

NOAA, 2020. Coastal Zone Management Act, Available at: https://coast.noaa.gov/czm/act/. Accessed May 14, 2020.

2.12 Mineral Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
MINERAL RESOURCES — Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Discussion

a) **Less than Significant Impact.** According to the Surface Mining and Reclamation Act (SMARA) Mineral Land Classification maps, the proposed park project sites would be located in areas with a mineral land classification of MRZ- 1, MRZ-2, and MRZ-3 (DOC 1979a, DOC 1979b, DOC 1979c). MRZ-1 is classified as areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. Valley Village Park and Alexandria Park are both entirely within the MRZ-1 land classification. North Hollywood Park lies primarily in a MRZ-1 classification with the northeast corner of the park classifying as MRZ-3 (discussed in more detail below).

MRZ-2 is classified as areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists. The majority of the proposed park project sites would occur within this land classification including David M. Gonzales Park, Fernangeles Park, Strathern Park North, Whitsett Fields Park North, and Valley Plaza Park North. Valley Plaza Park South is compromised both of MRZ-2 and MRZ-3 classifications. MRZ-3 is classified as areas containing mineral deposits of significance of which cannot be evaluated from available data. No park is entirely classified as MRZ-3 but two of the parks, as discussed above, are partially classified as MRZ-3, Valley Plaza Park South and North Hollywood Park. While a portion of the proposed park project sites would occur in areas where mineral resources are present or judged to likely be, the proposed Program does not involve any mineral extraction. According to the United States Geological Survey (USGS) Mineral Resources Data System, the proposed Program area is not identified as a known mineral resource area and does not have a history of mineral extraction uses (USGS 2020a). There are known mineral resource area sites near the David M. Gonzales Recreation, Fernangeles Park Center, and Valley Plaza Park North. Approximately 0.65 miles southeast of the David M. Gonzales Recreation Center is the Pacoima Hill Quarry, which provides granite and crushed/broken stone (USGS 2020d). Granite Materials Co. – Wick St., near Fernangeles Park provides commodities such as sand, gravel, and construction services (USGS 2020c). The Hewitt Plant site located north of Valley Plaza Park North was a previous provider of commodities of sand and gravel as well as construction (USGS 2020b). This site is not currently active. The proposed Program implementation

would not affect any of the mineral extraction sites located near the stormwater capture facilities, and as discussed above the proposed Program itself would not involve mineral extraction. As such, the proposed Program would not result in the loss of availability of a known mineral resource and impacts would be less than significant.

b) **No Impact.** The proposed park project sites are not located in areas used for mineral extraction and are not known as locally important resource recovery sites. Further, the proposed park project sites are not delineated on the City of Los Angeles General Plan or any other land use plan for mineral resource recovery uses. Therefore, no impact would occur.

References

California Department of Conservation (DOC), 1979a. Mineral Land Classification Map Aggregate Resources Only: Burbank Quadrangle Plate 2.6. Available at: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartII/. Accessed April 20, 2020.

DOC, 1979b. Mineral Land Classification Map Aggregate Resources Only: San Fernando Quadrangle Plate 2.17. Available at: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartII/. Accessed April 20, 2020.

DOC, 1979c. Mineral Land Classification Map Aggregate Resources Only: Van Nuys Quadrangle Plate 2.20. Available at: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartII/. Accessed April 20, 2020.

United States Geological Survey (USGS). 2020a. Mineral Resources Data System (MRDS). Available at: https://mrdata.usgs.gov/mineral-resources/mrds-us.html. Accessed April 20, 2020.

USGS. 2020b. MRDS: Hewitt Plant. Available at: https://mrdata.usgs.gov/mrds/show-mrds.php?dep_id=10163731. Accessed April 20, 2020.

USGS. 2020c. MRDS: Granite Materials Co. – Wick St. Available at: https://mrdata.usgs.gov/mrds/show-mrds.php?dep_id=10236316. Accessed April 20, 2020.

USGS. 2020d. MRDS: Pacoima Hill Quarry. Available at: https://mrdata.usgs.gov/mrds/show-mrds.php?dep_id=10065255. Accessed April 20, 2020.

2.13 Noise

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
NOISE — Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion

a) **Less than Significant Impact with Mitigation.** Noise is defined as unwanted sound; however, not all unwanted sound rises to the level of a potentially significant noise impact. To differentiate unwanted sound from potentially significant noise impacts, the City of Los Angeles has established noise regulations. The following analysis evaluates potential noise impacts at noise-sensitive land uses in each jurisdiction resulting from construction and operation of the proposed Program.

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is generally defined as unwanted sound (i.e., loud, unexpected, or annoying sound). Acoustics is defined as the physics of sound. In acoustics, the fundamental scientific model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determines the sound level and characteristics of the noise perceived by the receiver. Acoustics addresses primarily the propagation and control of sound.

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement. The dB scale is a logarithmic scale (i.e., not linear) that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to the threshold of human hearing and 120 to 140 dB corresponding to the threshold of pain. In a non-controlled environment, a change in sound level of 3 dB is considered “just perceptible,” a change in sound level of 5 dB is considered “clearly noticeable,” and a change in 10 dB is perceived as a doubling of sound volume (Caltrans 2013a). Pressure waves traveling through air exert a force registered by the human ear as sound.

The typical human ear is not equally sensitive to all frequencies of the audible sound spectrum. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 hertz (Hz) and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to extremely low and extremely high frequencies. This method of frequency weighting is referred to as A-weighting and is expressed in units of A-weighted decibels (dBA). A-weighting follows an international standard methodology of frequency de-emphasis and is typically applied to community noise measurements.

An individual's noise exposure is a measure of noise over a period of time, whereas a noise level is a measure of noise at a given instant in time. Community noise varies continuously over a period of time with respect to the contributing sound sources of the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with the individual contributors unidentifiable. The background noise level changes throughout a typical day, but does so gradually, corresponding with the addition and subtraction of distant noise sources such as traffic. What makes community noise variable throughout a day, besides the slowly changing background noise, is the addition of short-duration, single-event noise sources (e.g., aircraft flyovers, motor vehicles, sirens), which are readily identifiable to the individual. These successive additions of sound to the community noise environment change the community noise level from instant to instant, requiring the measurement of noise exposure over a period of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts.

The time-varying characteristic of environmental noise over specified periods of time is described using statistical noise descriptors in terms of a single numerical value, expressed as dBA. The most frequently used noise descriptors are summarized below:

Leq: The Leq, or equivalent sound level, is used to describe the noise level over a specified period of time, typically 1-hour, i.e., Leq(1), expressed as Leq. The Leq may also be referred to as the "average" sound level.

Lmax: The maximum, instantaneous noise level.

Lmin: The minimum, instantaneous noise level.

Lx: The noise level exceeded for specified percentage (x) over a specified time period; i.e., L50 and L90 represent the noise levels that are exceeded 50 and 90 percent of the time specified, respectively.

Ldn: The Ldn is the average noise level over a 24-hour period, including an addition of 10 dBA to the measured hourly noise levels between the hours of 10:00 P.M. to 7:00 A.M. to account nighttime noise sensitivity. Ldn is also termed the day-night average noise level or DNL,

CNEL: Community Noise Equivalent Level (CNEL), is the average noise level over a 24-hour period that includes an addition of 5 dBA to the measured hourly noise levels between the evening hours of 7:00 P.M. to 10:00 P.M., and an addition of 10 dBA to the measured hourly noise levels between the nighttime hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity during the evening and nighttime hours, respectively.

City of Los Angeles Municipal Code

The City of Los Angeles Noise Regulation is provided in Chapter XI of the Los Angeles Municipal Code (LAMC) and establishes acceptable ambient sound levels to regulate intrusive noises within specific land use zones and provides procedures and criteria for the measurement of the sound level of noise sources. These procedures recognize and account for differences in the perceived level of different types of noise and/or noise sources.

Section 111.01 and Section 111.03 of the LAMC define the ambient noise as the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. The actual ambient noise level is the measured noise level averaged over a period of at least 15 minutes Leq.

Section 111.02 of the LAMC provides procedures and criteria for the measurement of the sound level of "offending" noise sources. In accordance with the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. To account for people's increased tolerance for short-duration noise events, the Noise Regulation provides a 5 dBA allowance for noise occurring more than 5 but less than 15 minutes in any 1-hour period and an additional 5 dBA allowance (total of 10 dBA) for noise occurring 5 minutes or less in any 1-hour period.

LAMC Section 112.02 limits increases in noise levels from air conditioning, refrigeration, heating, pumping and filtering equipment. Such equipment may not be operated in such a manner as to create any noise which would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than 5 dBA.

Section 112.05 of the LAMC sets a maximum noise level for construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. Compliance with this standard is required only where "technically feasible."

Section 41.40 of the LAMC prohibits construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 A.M. to 9:00 P.M.; and Saturdays and National Holidays between 8:00 A.M. to 6:00 P.M.). In general, the City's Department of Building and Safety enforces noise ordinance provisions relative to equipment and the Los Angeles Police Department enforces

provisions relative to noise generated by people. However, the provisions of Section 41.40(a) shall not apply to any person who performs the construction, repair or excavation work involved pursuant to the express written permission of the Board of Police Commissioners through its Executive Director. The Executive Director on behalf of the Board, may grant this permission, upon application in writing, where the work purposed to be done is in the public interest, or where hardship or injustice, or unreasonable delay would result from its interruption during the hours mentioned above, or where the building or structure involved is devoted or intended to be to be developed to a use immediately related to public defense.

Construction

The proposed Program consists of construction of stormwater capture facilities at nine City-owned parks. Construction activities at all nine parks would include multiple construction phases. Construction of the North Hollywood Park project is anticipated to take approximately 24 months, and construction of the eight other parks are anticipated to take approximately 17 to 18 months each. Site specific construction fleets may vary due to specific park project needs at the time of construction. A detailed summary of construction equipment assumptions by phase, determined in coordination with the City, is provided in the modeling files in **Appendix F**. The analysis includes consideration of construction noise effects on noise sensitive receivers in the vicinity of the park project sites due to the use of construction equipment (on-site construction activities) and haul trucks (off-site construction activities).

All nine parks are located within the Upper Tujunga Wash Watershed within the San Fernando Valley Groundwater Basin. The nearest sensitive receptors would be the schools and residential developments within 1,000 feet of each park. Sensitive receptors for each park are as follows:

- **David M. Gonzales Recreation Center**: Residential receptors within 1,000 feet; Pacoima Charter school located directly north of the park; and Guardian Angel School located west of the park directly across Norris Avenue.
- **Fernangeles Park**: Residential receptors within 1,000 feet; and Robert H. Lewis High School and Francis Polytechnic Senior High School located approximately 700 feet to the southwest.
- **Strathern Park North**: Residential receptors within 1,000 feet.
- **Whitsett Fields Park North:** Residential receptors within 1,000 feet.
- **Valley Plaza Park North:** Residential receptors within 1,000 feet, Little Steps Head Start Preschool located at the southern end of the park and Bellingham Elementary School located approximately 700 feet southeast of the Park.
- **Valley Plaza Park South:** Residential receptors within 1,000 feet; Bellingham Elementary located approximately 340 feet northeast of the Park; Little Steps Head Start Preschool located approximately 200 feet north of the Park; and Roy Romer Middle school located directly across St. Claire Avenue to the east of the park.

- **Alexandria Park:** Residential receptors within 1,000 feet.
- **North Hollywood Park:** Residential receptors within 1,000 feet; The Wesley School located approximately 150 feet southeast; Oakwood Secondary School located approximately 400 feet west of the Park; and Lankershim Elementary School located approximately 500 feet east.
- **Valley Village Park:** Residential receptors within 1,000 feet; Oakwood Secondary School located approximately 680 feet north of the Park; and The Wesley School located approximately 800 feet southeast.

On-Site Construction Activities

Noise from on-site construction activities would be generated by the use of equipment involved during various stages of the construction activities. The noise levels generated by construction equipment would vary depending on factors such as the type and number of equipment, the specific model (horsepower rating), the construction activities being performed, and the maintenance condition of the equipment. Individual pieces of construction equipment anticipated to be used during the proposed Program construction could produce maximum noise levels of 75 dBA to 101 dBA Lmax at a reference distance of 50 feet from the noise source, as shown in **Table NOI-1**. These maximum noise levels would occur when equipment is operating under full power conditions. The estimated usage factor for the equipment is also shown in Table NOI-1. The usage factors are based on the Federal Highway Administration (FHWA) Roadway Construction Noise Model User's Guide (FHWA 2006).

TABLE NOI-1
CONSTRUCTION EQUIPMENT AND ESTIMATED NOISE LEVELS

Source	Estimated Usage Factor (%)	Reference Noise Level at 50 feet (dBA Lmax)
Air Compressor	40%	78
Auger Drill Rig	20%	84
Bore/Drill Rig	20%	79
Compactor	20%	83
Concrete Saw	20%	90
Crane	16%	81
Dump/Haul Truck	40%	76
Excavator	40%	81
Forklift	10%	75
Other Equipment	50%	85
Pump	50%	81
Roller	20%	80
Rubber Tired Dozer	40%	82
Tractor/Loader/Backhoe	25%	80

SOURCE: FHWA 2006

To characterize construction-period noise levels, the hourly Leq noise level associated with each construction phase is estimated based on the quantity, type, and usage factors for each type of equipment used during each construction phase and are typically attributable to multiple pieces of equipment operating simultaneously. Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are operated concurrently. The estimated noise levels at noise sensitive receptors were calculated using the FHWA's RCNM and were based on a maximum concurrent operation of construction equipment, which is considered a worst-case evaluation. This is considered a worst case scenario because the project would typically use less equipment simultaneously, and as such would generate lower noise levels during construction.

The amount of construction equipment used for the construction of the stormwater capture system at Strathern Park North is as intensive or more intensive as compared to the construction equipment used during construction at the other eight park project sites. Furthermore, the amount of overlap of construction phases and activities for Strathern Park North is also as intensive or more intensive when compared to the overlap of construction phases for the other eight park project sites (see Appendix F for detailed information on construction phasing and equipment for each park). Of the nine parks, Strathern Park North has the closest off-site receptors directly to the north of the park (see Figures 1-13 through 1-21). Therefore, Strathern Park North is used as a worst-case scenario proxy for all other parks because it has the closest noise sensitive receptors and a construction equipment list and overlap of construction phasing that is as intensive or intensive than the other eight park project sites.

During construction activities at Strathern Park North, while construction equipment could at times temporarily be close to the homes to the north, the equipment would be mobile and move throughout the construction area. According to the California Emissions Estimator Model (CalEEMod) used for the proposed Program's air quality and GHG emissions analysis, mobile grading equipment exhibit approximately 227 to 454 linear feet of movement in an average hour (based on 0.5 to 1 acres of grading per 8-hour workday and a 12-foot grading width (CalEEMod Appendix A, 2017). For the purposes of estimating maximum noise levels at a noise-sensitive location, conservatively assuming a quarter of the distance of 114 linear feet of movement in an hour, which assumes equipment would be closer to the receptor, the average distance from the receptor would be 28 feet. A rounded-down value of 25 feet is used for the purposes of this analysis, which represents the conservatively estimated average closest distance for mobile (tracked or rubber-tired) construction equipment to nearby noise-sensitive receptors. Since it is not physically possible for equipment to be all located at the same location at the same time, the loudest equipment was assumed to be located at the conservative distance described above of 25 feet while other equipment were located at staggered distances of 125 feet and 225 feet.

Table NOI-2 shows the estimated maximum construction noise levels that would occur at the nearest off-site sensitive uses during a peak day of construction activity at Strathern

Park North. As shown on Table NOI-2, for the nearest sensitive receptor, construction noise levels were estimated range from a maximum of 91 dBA Leq during the overlap of several construction phases (grading and excavation, installation of the stormwater capture system, soil filling and revegetation, pump station improvements and electrical infrastructure, and building construction) and a minimum of 77 dBA Leq during pump station improvements and electrical infrastructure installation. However, these increases would only occur for a temporary duration at the nearest sensitive receptor location as construction activities would occur across the park project site. In addition, construction activities at any given park project site would occur at the site for a period of approximately 17 to 24 months Although noise impacts would be temporary during construction phases, this impact is considered to be potentially significant and mitigation measures are required.

TABLE NOI-2
UNMITIGATED MAXIMUM CONSTRUCTION NOISE LEVELS AT SENSITIVE RECEPTORS

Source	Estimated Distance (feet)	Noise Level (dBA Leq)
Site Clearing and Preparation	25–225	89
Grading and Excavation	25–225	86
Installation of the Stormwater Capture System	25–225	86
Soil Filling and Revegetation	25–225	85
Pump Station Improvement and Electrical Infrastructure Upgrades	25–225	77
Building Construction	25–225	83
Overlap of the Grading and Excavation, Installation of the Stormwater Capture System, Soil Filling and Revegetation, Pump Station Improvements and Electrical Infrastructure, Building Construction	25–225	91
Maximum Noise Level	**—**	**91**
Significance Threshold	**50**	**75**
Exceed Threshold (Yes/No)?	**—**	**Yes**

NOTES:
1. Construction schedule provided by the City.
2. Detailed construction noise calculations are provided in Appendix F

SOURCE: ESA 2020

Implementation of **Mitigation Measures NOI-1, NOI-2,** and **NOI-3** would reduce construction noise levels by a minimum of 20 dBA to the extent technically possible. In addition, **Mitigation Measure NOI-4** would require noticing of schools and residences prior to construction. As shown in **Table NOI-3**, with the incorporation of **Mitigation Measures NOI-1 through NOI-4**, construction noise levels were estimated to reach a maximum of 71 dBA Leq during the overlap of construction phases (see Table NOI-3 for phase details), which would not exceed the standard set forth in LAMC Section 112.05, which sets a maximum noise level for construction equipment of 75 dBA at 50 feet when

operated within 500 feet of a residential zone. Therefore, the short-term on-site construction noise impacts would be mitigated to less than significant.

TABLE NOI-3
MITIGATED MAXIMUM CONSTRUCTION NOISE LEVELS AT SENSITIVE RECEPTORS

Source	Estimated Distance (feet)	Noise Level (dBA Leq)
Site Clearing and Preparation	25–225	69
Grading and Excavation	25–225	66
Installation of the Stormwater Capture System	25–225	66
Soil Filling and Revegetation	25–225	65
Pump Station Improvement and Electrical Infrastructure	25–225	57
Building Construction	25–225	63
Overlap of the Grading and Excavation, Installation of the Stormwater Capture System, Soil Filling and Revegetation, Pump Station Improvements and Electrical Infrastructure, Building Construction	25–225	71
Maximum Noise Level	**25–225**	**71**
Significance Threshold	**50**	**75**
Exceed Threshold (Yes/No)?	**—**	**No**

NOTES:

1. Construction schedule provided by the City.
2. Detailed construction noise calculations are provided in Appendix F.

SOURCE: ESA 2020

Construction would typically occur Monday through Friday, within the hours of 7:00 A.M. and 4:00 P.M. and no construction would occur on the weekends. Consistent with LAMC Section 41.40, construction would not occur between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday. It is possible that on infrequent occasions, construction activities could occur outside of these hours. However, pursuant to LAMC Section 41.40(a), prior to these activities, the City would obtain written permission of the Board of Police Commissioners through its Executive Director to approve of this work. As a result, the Program would be in compliance with applicable noise standards established in the LAMC, construction noise impacts would be mitigated to less than significant.

Off-Site Construction Activities

On-road trucks would be used to transport materials to and from the construction areas at the nine different park projects. Trucks would travel past noise-sensitive school and residential uses along the roads around the nine parks. Conservatively, since all nine parks are located within the Upper Tujunga Wash Watershed within the San Fernando Valley Groundwater Basin, this analysis conservatively assumes the scenario where the maximum number of trucks overlapping phases across all nine parks would be 474 trucks per day and could travel on any major roadway at any given park during construction of the proposed Program (59 trucks during a peak hour is assumed in the analysis) (see

detailed summary of construction truck assumptions by phase and the noise modeling files in Appendix F). The temporary addition of 59 trucks per day during construction activities would result in a peak hour noise level of 65.5 dBA Leq at 20 feet from the roadway (or approximately 35 feet from the centerline based on a 30-foot roadway width typical of roadways in the vicinity of the proposed park project sites). For purposes of this analysis, ambient noise levels were determined using a roadway from a City of Los Angeles project that is in the approximate vicinity of the proposed Program. The NoHo West Project is located in North Hollywood and includes roadway segments that would be representative of the roadways near the proposed Program (i.e., similar location and near arterial roadways and SR 170). The lowest roadway noise level along Oxnard Boulevard between SR 170 on-ramp and Radford Avenue of 68.6 dBA Leq was used as the ambient noise level for the analysis. Applying the City's 2006 L.A. CEQA Thresholds Guide, the threshold for off-site construction noise would be ambient noise levels plus 5 dBA, equal to 73.6 dBA Leq. At 65.5 dBA Leq, the park project's temporary noise from truck travel would contribute to increased noise levels to 70.3 dBA Leq on any given roadway around the park project sites during construction, which would not exceed the threshold of 73.6 dBA Leq. Therefore, off-site construction traffic noise impacts would be less than significant.

Operations

The existing noise environment surrounding the park project sites is dominated by traffic noise from nearby roadways. As the proposed Program is an infrastructure project that involves construction of stormwater capture facilities at nine City-owned parks, operation of the proposed Program would not result in a net increase in operational noise levels. The proposed Program would require periodic maintenance activities which would involve a few trucks or vehicles bi-monthly traveling to the parks and minimal employee trips. Given the sporadic usage of maintenance vehicles and minimal employee trips, the proposed Program's operation would not result in an audible increase in noise levels. As such, operation of the proposed Program would result in a less than significant impact.

Mitigation Measures

NOI-1: For construction activities adjacent to noise-sensitive receptors (e.g., residences and schools), the contractor shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. The contractor shall use muffler systems (e.g., absorptive mufflers) that provide a minimum reduction of 5 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. The contractor shall also keep documentation on-site verifying compliance with this measure.

NOI-2: For construction activities adjacent to noise-sensitive receptors (e.g., residences and schools), where physically and technically feasible, the contractor shall provide an 8-foot-tall to 20-foot-tall temporary fence or other barrier placed

between the project construction area and the sensitive receptor with a performance standard of achieving a 15 dBA noise level reduction at the sensitive receptors. The temporary fence or barrier shall be used during peak noise-generating construction phases when the use of heavy equipment is prevalent. A noise barrier is not required if it would pose a safety risk or unreasonably prevent access to the construction area as deemed by the on-site construction manager, such as in areas that have limited equipment maneuvering space or access.

NOI-3: Limit engine idling of construction equipment (e.g., haul trucks, loaders) to a minimum of 200 feet from any boundary of the nearest sensitive receptors.

NOI-4: Prior to commencement of construction activities, the City shall notify in writing adjacent residents, schools and businesses near the various park project sites, of proposed construction activities and the tentative schedule.

The notices shall also provide a contact person and hotline where local residents, schools, or business owners can call during active construction with questions or comments. The City shall respond to inquiries regarding construction noise and vibration. Notices and construction signs will include a website address which will be updated quarterly and will include Program-related information.

b) **Less than Significant Impact with Mitigation.** The proposed stormwater capture facilities would be constructed using typical construction techniques and would use impact equipment, such as jack hammers, bulldozers, bore/drill rigs and loaded trucks. As such, it is anticipated that the equipment to be used during construction would generate ground-borne vibration.

Ground-borne vibration is primarily generated from the use of construction equipment and from heavy-duty vehicle traffic and trains. Ground-borne vibration propagates from the source through the ground to adjacent buildings by surface waves. Vibration energy dissipates as it travels through the ground, causing the vibration amplitude to decrease with distance away from the source. Vibration in buildings is typically perceived as rattling of windows, shaking of loose items, or the motion of building surfaces. The vibration of building surfaces also can be radiated as sound and heard as a low-frequency rumbling noise, known as ground-borne noise. Vibration levels for potential structural damage is described in terms of the peak particle velocity (PPV) measured in inches per second (in/sec). Road vehicles rarely create enough ground-borne vibration amplitude to be perceptible to humans unless the receiver is in immediate proximity to the source or the road surface is poorly maintained and has potholes or bumps.

Human sensitivity to vibration varies by frequency and by receiver. Generally, people are more sensitive to low-frequency vibration. Human annoyance also is related to the number and duration of events; the more events or the greater the duration, the more annoying it becomes. Ground-borne vibration related to human annoyance is generally related to root mean square (rms) velocity levels and expressed as velocity in decibels (VdB).

The City of Los Angeles does not address vibration in the City's municipal code or general plan noise elements. Thus, for the proposed Program, the Federal Transit

Authorities (FTA)'s criteria for structural damage and human annoyance from the Transit Noise and Vibration Impact Assessment Manual (FTA, 2018) was used. With respect to residential and commercial structures, the FTA, provides a vibration damage potential criterion for continuous/frequent intermittent vibration sources of 0.5 in/sec PPV for Category I, Reinforced-concrete, steel, or timber (no plaster) buildings, which includes newer residential structures and modern industrial/commercial buildings and 0.2 in/sec PPV for Category III, Non-engineered timber and masonry buildings, which includes older residential structures (FTA 2018). The guidance also provides an 80 VdB threshold for construction and operational vibration impacts associated with human annoyance for infrequent events (FTA 2018). The proposed Program's construction activities would generate vibration at vibration-sensitive receptors infrequently from occasional equipment activity and only when within 50 to 100 feet from vibration-sensitive receptors. Therefore, consistent with the FTA Transit Noise and Vibration Impact Assessment Manual, the criteria for infrequent events is used.

Construction

According to the FTA, ground vibrations from construction activities very rarely reach the level that can damage structures. A possible exception is the case of old, fragile buildings of historical significance where special care must be taken to avoid damage (FTA 2006). The construction activities that typically generate the most severe vibrations are blasting, which would not be utilized for the proposed Program. The proposed Program would utilize construction equipment such as use of loaded trucks and jackhammers, which would generate ground-borne vibration during construction activities. The vibration velocities at various distances for several types of construction equipment that can generate perceptible vibration levels are identified in **Table NOI-4**. Based on the information presented in Table NOI-4, vibration velocities could range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of activity.

TABLE NOI-4
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

	Approximate PPV (in/sec)						
Equipment	**25 Feet**	**50 Feet**	**60 Feet**	**75 Feet**	**100 Feet**	**200 Feet**	**300 Feet**
Bore/Drill Rig	0.0890	0.0361	0.0285	0.0213	0.0147	0.0060	0.0035
Loaded Trucks	0.0760	0.0309	0.0244	0.0182	0.0125	0.0060	0.0035
Jackhammer	0.0350	0.0142	0.0112	0.0084	0.0058	0.0051	0.0030
Small Bulldozer	0.0030	0.0012	0.0010	0.0007	0.0005	0.0023	0.0014

SOURCE: FTA 2018; ESA 2020.

As described under Section 2.13 (a), Strathern Park North has the closest off-site receptors directly to the north of the park and the number of equipment and overlap of construction phases for Strathern Park North is as intensive or more intensive than those at the other eight park project sites. Therefore, Strathern Park North is used as the worst-

case scenario for the maximum vibration impacts from on-site construction activities to the nearest sensitive receptors for the proposed Program.

Similar to the construction noise impact analysis as presented in Section 2.13 (a), above, a distance of 25 feet is used as the conservatively estimated average closest distance for construction equipment to adjacent sensitive receptors around Strathern Park North. Based on the vibration levels presented in Table NOI-4, at a distance of 25 feet from the park project site, the maximum vibration level would be up to approximately 0.089 in/sec PPV for a bore/drill rig, which would not exceed the significance threshold of 0.2 in/sec PPV. Therefore, the use of construction equipment would not result in a groundborne vibration velocity level above 0.2 in/sec at the nearest off-site structure and impacts would be less than significant. And, as all other sensitive receptors would be further away from their respective parks than the sensitive receptors to the north of Strathern Park North, the groundborne vibration impacts due to construction equipment would be less than significant.

With respect to human annoyance, at a distance of 25 feet from the construction site at Strathern Park North, the sensitive receptors would be exposed to vibration levels at approximately 87 VdB, which is above the 80 VdB threshold for human annoyance. However, these increases would only occur for a temporary duration at the nearest sensitive receptor location, as construction equipment that produce high levels of vibration would be used sporadically during any given construction day. Vibration levels would be below the 80 VdB threshold at vibration-sensitive receptors when high vibration-generating equipment (e.g., bore/drill rigs, loaded trucks) would be at a distance of approximately 45 feet or greater from the receptor. Equipment such as jackhammers and small bulldozers would generate approximately 79 VdB or less at 25 feet from a vibration-sensitive receptor. Furthermore, construction activities at any given park would only occur at the site for a period of approximately 17 to 24 months, so construction-related vibration would be experienced by nearby sensitive receptors for a relatively short duration at any given park project site and only when high vibration-generating equipment are within 45 feet or less of the vibration-sensitive receptor. Although vibration impacts are not expected due to the limited duration of construction activities at any one location, this impact is considered to be potentially significant and mitigation measures are required. Implementation of **Mitigation Measure NOI-6,** would reduce construction vibration levels by restricting the proximity to which construction equipment that generates high levels of vibration could be within sensitive receptors. With the incorporation of **Mitigation Measure NOI-6**, the sensitive receptors would be exposed to vibration levels at approximately 79 VdB, which is below the 80 VdB threshold for human annoyance. Therefore, construction vibration impacts would be considered less than significant with implementation of **Mitigation Measure NOI-6.**

Operations

The proposed Program is an infrastructure project that involves construction of stormwater capture facilities at nine City-owned parks, operation of the proposed stormwater capture facilities would not result in a net increase in operational vibration levels. The proposed

stormwater capture facilities would require periodic maintenance activities which would involve a few trucks or vehicles bi-month traveling to each parks project site and minimal employee trips. The minimal maintenance activities and employee vehicle trips would not generate perceptible vibration levels that would cause structural damage or human annoyance. Therefore, vibration impacts during operation of the proposed Program would be less than significant.

Mitigation Measure

NOI-6: The operation of construction equipment that generates high levels of vibration, such as large bulldozers and loaded trucks, shall be prohibited within 45 feet of the property lines of existing residential and school uses adjacent to the various park project sites. Instead, rubber-tired equipment not exceeding 247 horsepower shall be used in these areas during construction within 45 feet from the sensitive receptor locations.

c) **No Impact.** The proposed Program would not locate noise-sensitive uses within an airport land use plan area, within 2 miles of a public airport or public use airport, or within the vicinity of a private airstrip, heliport, or helistop. Therefore, the proposed Program would not result in an exposure of noise-sensitive uses to excessive noise levels from such uses. No impact would occur.

References

California Department of Transportation (Caltrans), 2013a. Technical Noise Supplement (TeNS), Section 2.2.1, September 2013. Available at: http://www.dot.ca.gov/env/noise/docs/tens-sep2013.pdf. Accessed July 2020.

Caltrans, 2013b. Transportation and Construction Vibration Guidance Manual, September 2013. Available at: http://www.dot.ca.gov/env/noise/docs/tcvgm-sep2013.pdf. Accessed July 2020.

California Estimator Emissions Model, Appendix A Calculation Details for CalEEMod, October 2017. Available: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6. Accessed July 2020.

City of Los Angeles, NoHo West Project Draft EIR February 9, 2015. Available: https://planning.lacity.org/development-services/eir/noho-west-project-1. Accessed July 2020.

Federal Highway Administration (FHWA), 2006. Roadway Construction Noise Model – RCNM and User Guide, January 2006. Available at: https://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/. Accessed June 2020.

Federal Transit Administration, 2006. Transit Noise and Vibration Impact Assessment, May 2006. Available at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf. Accessed July 2020.

Federal Transit Administration (FTA), 2018. Transit Noise and Vibration Impact Assessment Manual.

2.14 Population and Housing

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
POPULATION AND HOUSING — Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

a) **No Impact.** The proposed Program consists of the installation of a stormwater capture system and park renovations at nine different parks project sites within LADWP's service area. The proposed Program would not directly induce population growth as the proposed Program would not include the construction of new homes and businesses and would not indirectly support new population or economic expansion. The City has identified opportunities to increase stormwater capture in Los Angeles as part of its effort to increase the local water supply and reduce the dependence on imported water for the City of Los Angeles. The stormwater being captured would help supplement the existing water portfolio in order to be able to meet future demand. The proposed Program would not result in any substantial change to the existing land use pattern or trigger growth in the area. No impact would occur.

b) **No Impact.** The proposed Program would not include the removal of housing and would not displace people, necessitating the construction of replacement housing elsewhere. Therefore, no impact would occur.

2.15 Public Services

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
PUBLIC SERVICES —				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
i) Fire protection?	☐	☐	☐	☒
ii) Police protection?	☐	☐	☐	☒
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☐	☒

Discussion

a.i) **No Impact**. The proposed Program would be located entirely within the City of Los Angeles. The Los Angeles Fire Department provides fire protection services to the City of Los Angeles. The proposed Program would not include new homes or businesses that would require additional services or extended response times for fire protection services. The proposed park project sites are currently served by the Los Angeles Fire Department, and would not substantially alter the existing fire service demands once construction is completed. The Los Angeles Fire Department would not be required to expand or construct new fire station locations to serve the Program area. Therefore, no impact would occur.

a.ii) **No Impact.** Police services to the proposed park project sites are provided by the Los Angeles Police Department, which services the City of Los Angeles. Construction activities would be short-term, and limited to anywhere from 8 to 56 construction workers per day over the construction period. Operation and maintenance of the proposed Program would be performed by existing City employees. The proposed Program would not include new housing or businesses to the area that would require any additional police protection services. Therefore, police protection needs would not increase and the Los Angeles Police Department would not be required to expand or construct new police stations to serve the project area. No impacts would occur.

a.iii) **No Impact.** The proposed Program would not change existing demand for school services, as the proposed Program would not result in an increase in population. Therefore, the proposed Program would have no impact related to school services.

a.iv) **Less than Significant Impact.** During construction, impacts at each proposed park project site would result in displacement of park goers for the approximate 10 to 24-

month construction period of each. During this time, adjacent parks may result in increased attendance. However, this would be temporary during the construction period and park project sites would be returned to pre-project conditions once construction is completed. The proposed Program would not result in an increase in population, and would not prompt the need for new parks. Impacts would be considered less than significant.

a.v) **No Impact.** The proposed Program would not include new housing or businesses to the area that would require any additional services or public facilities, including libraries. Therefore, the proposed Program would have no impact related to other public facilities.

2.16 Recreation

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
RECREATION —				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** The proposed Program consists of the construction and installation of a stormwater capture system at nine park project sites within LADWP's service area. The proposed Program would not result, directly or indirectly, in an increase in population. During construction, the proposed park project sites and walking trails would be partially to fully inaccessible to the public, which might increase attendance at other existing nearby parks. In addition, youth sports teams that currently use the park facilities may have to find alternative ball fields during the construction period. However, this would be temporary, during the approximate 10 to 24-month construction period at each park project site. Once constructed, the proposed stormwater capture facilities would be located underground and the proposed park project sites would serve a dual-use. Maintenance roads that would also serve as walking paths would be constructed at each proposed park project site or existing paths may be enhanced in order to access maintenance holes for operational purposes. The proposed park project impact areas would mainly be returned to recreational facilities and maintenance paths would be incorporated into the overall recreational improvements and park design, where feasible. The City has committed to park enhancements and improvements to further benefit the park users and local residents, and these enhancements would be determined with input from RAP. Although these parks would serve a dual-use function as an LADWP facility and park, the emphasis on the redesign and improvement of the proposed park project sites post-construction of the underground facilities, would be on recreation and upgrades to the overall look and function of the existing park as shown on the preliminary design figures for each part project site (Figures 1-4 through 1-12). Impacts to existing neighborhood or regional parks and other recreational facilities would be considered less than significant.

b) **Less than Significant Impact.** The proposed Program would not result, directly or indirectly, in an increase in population. The proposed Program includes the installation of a stormwater capture system. The proposed Program would improve existing facilities at the nine proposed park project sites once construction is completed. These improvements would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, instead the improvements would

allow for a dual use facility for both City staff and recreational purposes. As stated above in Section 2.16 (a), the City has committed to park enhancements and improvements to further benefit the park users and local residents, and these enhancements would be determined with input from RAP and the community. Improvements to the proposed park project sites would not have an adverse physical effect on the environment, impacts would be considered less than significant.

2.17 Transportation

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
TRANSPORTATION — Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☒	☐	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
d) Result in inadequate emergency access?	☐	☒	☐	☐

Discussion

The analysis presented in this section is based on the *Stormwater Capture Parks Program Transportation Assessment* (Fehr & Peers, 2020) prepared for the proposed Program, and is included as **Appendix G**. The analysis included in the Transportation Assessment assumed a 2-year construction period for the proposed Program. As discussed in Section 1, the proposed Program is currently proposed to occur over a longer, 4-year period. Therefore, the analysis in the Transportation Assessment provides a more stringent analysis than is currently proposed for Program construction.

a) **Less than Significant Impact.** The proposed Program consists of nine separate city parks which, in aggregate, have more than 250 feet of linear frontage on streets classified as Avenues and Boulevards. In addition, the Fernangeles Park project site would include construction modification to the public right-of-way along Allegheny Street. These changes could have the potential to conflict with the circulation system surrounding each of the proposed park project sites. Construction of the new driveways would not impact existing passenger transit stops as none exist along the frontages of the proposed park project sites.

A review of City documents such as the Los Angeles *Mobility Plan 2035*, the local community plans, land use element, Vision Zero plans, and Los Angeles Municipal Code (LAMC) sections was conducted to determine the potential for the proposed Program's to impact a program plan, ordinance, or policy. For a complete review of consistency of each proposed park project site with relevant plans refer to the Program's Traffic Assessment (included as Appendix G).

The proposed Program would include the construction and maintenance of subsurface facilities that would be designed to capture stormwater runoff. The majority of the Program components would be constructed within the nine proposed park project sites. Upon completion, the parks would be returned to their preconstruction condition. The proposed Program areas are existing recreational facilities. New limited-use driveways

would be construction at five proposed park project sites to provide City staff access for operational and maintenance purposes. The design and placement of those would be subject to the Los Angeles Department of Transportation (LADOT) approval to ensure that they are designed in accordance with the City's driveway design guidelines. During construction, vehicular access to the parks would be restricted temporarily, but pedestrian access would be maintained with temporary sidewalks or with signed detours, as needed. Temporary lane closures may be necessary on streets adjacent to some of the project sites. Where these measures are taken and where pedestrians are rerouted during construction of the project, these temporary changes would be made in compliance with the California Manual on Uniform Traffic Control Devices for Streets and Highway and the WATCH handbook to ensure their safety.

Once constructed, operations and maintenance activities of the proposed Program would include visual inspections on a bi-monthly basis and inspections after every storm event. The proposed Program would not generate a net increase of 250 or more daily vehicle trips.

Based on review of City and local documents, the temporary nature of construction activities, and compliance with state and local regulations, impacts to the circulation system including transit, roadway, bicycle and pedestrian facilities would be considered less than significant.

b) **Less than Significant Impact with Mitigation.** These revisions to the CEQA Guidelines criteria for determining the significance of transportation impacts are primarily focused on projects within transit priority areas and shift the focus from driver delay to reduction of GHG emissions, creation of multimodal networks, and promotion of a mix of land uses. Vehicle miles traveled (VMT) is a measure of the total number of miles driven to or from a development and is sometimes expressed as an average per trip or per person.

The City's required methodology for VMT analysis is documented in the LADOT's Transportation Assessment Guidelines (TAG) (LADOT 2019). LADOT's TAG provides clear guidance on whether and how to analyze impacts related to land use (development) projects and transportation projects. While the TAG does not directly provide a methodology for analyzing VMT related to infrastructure projects, the TAG explicitly excludes public utilities projects from significant impact consideration. The Lead Agency for the proposed Program is LADWP, a public utility, and the proposed infrastructure is intended to capture stormwater to maintain and increase the groundwater supply serving its customers. Thus, TAG screening criteria alone result in the proposed Program being excluded from a requirement to conduct VMT analysis. As a result, the proposed Program would have less than significant impacts to VMT. This conclusion is further supported by the fact that upon completion of the proposed Program, approximately two trips every other month are expected to occur for routine inspection and maintenance, which would average less than one trip per day across all nine proposed park project sites.

Construction of the proposed Program would result in a temporary increase in vehicle trips on local and regional roadways over a period of approximately 4.5 years. During any individual construction phase, the highest number of one-way worker trips at a park per day would be approximately 112 and the highest number of one-way truck trips would be approximately 152. However, as currently planned, the maximum level of construction-related worker and truck activity would occur during several months of 2023, when overlapping of phases would occur at the following Program sites: David M. Gonzales Recreation Center, Fernangeles Park, and Strathern Park North. During the overlapping phases, the highest number of daily truck trips at any one park per day would be approximately 185 with a standart construction fleet mix and approximately 240 with a 2014 or newer fleet mix (refere to Mitigation Measure AQ-1). Although construction would temporarily increase vehicle trips that could have the potential to impact traffic volumes on local streets and highways, LADOT generally considers construction-related traffic to cause adverse but less than significant impacts because these effects are of limited duration. However, to reduce construction-related traffic volumes on adjacent roadways and highways, the proposed Program would implement **Mitigation Measure TR-1**, which would require preparation of a CTMP for each site prior to initiating construction where in-street work would occur and/or where new driveways are proposed. Therefore, with implementation of **Mitigation Measure TR-1**, construction traffic impacts on local circulation systems would be less than significant.

Once constructed, approximately two trips every other month are expected to occur for routine inspection and maintenance, which would average less than one trip per day across the nine park sites. The increase in vehicle trips during operation and maintenance activities would be minimal and would not substantially increase traffic volumes on adjacent roadways and highways. Therefore, operational traffic impacts would be less than significant.

Mitigation Measures

TR-1: For parks where construction would occur outside of park facilities or that may impact roadways surrounding park areas, a CTMP shall be developed by the City or its contractor and approved by LADOT prior to the start of construction. The CTMP may include, but is not limited to the following:

- Work area traffic control plans for all in-street construction sites to the satisfaction of LADOT, as appropriate prior to the start of any construction work. The plans shall include such elements as the location of any lane closures, restricted hours during which lane closures would not be allowed, local traffic detours, protective devices and traffic controls (such as pavement markings, barricades, cones, flagmen, lights, warning beacons, temporary traffic signals, turning movement restrictions, warning signs), access to abutting properties, and provisions to maintain emergency access through construction work areas.
- The dates and locations where in-street and off-street construction activities are planned.

- If any street segments will be limited to one-way traffic, prepare detour plans over parallel routes.
- Require signage indicated alternative routes where construction will occur.
- Identify and consolidate staging areas for equipment and materials, as feasible.
- Consolidate truck trips, such that multiple worksites can be served, as feasible.
- Promote carpooling among workers.
- Contact emergency service providers in the project vicinity to notify of the location, hours, and duration of in-street construction. Provide advance notice of any lane closures and changes to local access and identity alternative routes where appropriate.

c) **Less than Significant Impact with Mitigation.** According to the TAG, a project could result in impacts due to geometric design hazards or incompatible uses if it includes construction of new driveways or modification to the public right-of-way. The proposed Program would include the construction of new permanent driveways at four of the nine proposed park project sites (Alexandria Park, Valley Plaza Park South, North Hollywood Park, and Valley Village Park). In addition, the Fernangeles Park project site would include the redesign and reconstruction of Allegheny Street between Laurel Canyon Boulevard and Remick Avenue, immediately north of Fernangeles Park to capture storm runoff with Green Street elements and a diversion pipe along Morehart Avenue. New diversion pipes would also be placed within public rights-of-way at David M. Gonzales Recreation Center, Strathern Park North, and Whitsett Fields Park North.

The proposed new driveways would be designed to comply with LADOT standards regarding their width, geometry and placement along the adjacent streets. The City would coordinate with LADOT for review of the conceptual plans of the proposed driveways. Construction of the new driveways would not impact existing passenger transit stops as none exist along the frontages of the proposed park project sites.

The new driveways would be limited in use to City staff, and would lead to maintenance roads within the parks for access to the proposed maintenance holes during operations. As such, they would not be available for use by general purpose traffic. Each of the driveways would provide access to a park, and would be located in areas with low to moderate levels of pedestrian activity. The topography at each location is generally flat, and it appears that these proposed driveways can be connected to the adjacent streets at right angles. Four of the five proposed park project sites with proposed new driveways would lead to low-speed streets. Tujunga Avenue and Magnolia Boulevard surrounding North Hollywood Park are classified as Avenue II streets, with higher speed limits than the other four park project sites. In addition, this segment of Magnolia Boulevard is on the High Injury Network. Prior to final design of this new limited-access driveway, the City will review crash data on the Magnolia Boulevard frontage to determine whether there are any common factors that would affect design of a new driveway.

If a locked gate at any of the proposed driveways is required, the City would design the driveway to ensure that maintenance vehicles entering and exiting the site would comply with LADOT requirements and would not block adjacent streets while locking and unlocking gates.

Final design for the proposed modifications to Allegheny Street and right-of-way impacts along Morehart Avenue associated with Fernangeles Park, as well as rights-of-way impacts associated with David M. Gonzales Recreation Center, Strathern Park North, and Whitsett Fields Park North projects have not yet been finalized. However, the City would ensure that the redesign of the proposed streets comply with all City standards.

The final design and location of the new limited-access driveways at the proposed park project sites and temporary vehicle access points to the sites have not yet been finalized but would be identified and approved as part of the CTMP Therefore, through compliance with local City requirements and implementation of **Mitigation Measure TR-1**, impacts related to geometric design features would be considered less than significant.

Mitigation Measure

Implement **Mitigation Measure TR-1**.

d) **Less than Significant Impact with Mitigation.** Construction of the proposed Program would require construction on roadways surrounding four of the proposed park project sites (David M. Gonzales Recreation Center, Fernangeles Park, Strathern Park North, and Whitsett Fields Park North). During construction of the proposed Program, traffic could increase as a result of construction vehicles and workers entering and exiting the project site. In addition, road closures may be required during pipe installation and street improvements. Once construction is complete, traffic would return to preconstruction conditions and would not interfere with an emergency response or evacuation plan. A CTMP would be required for the proposed Program as described in **Mitigation Measure TR-1**, and would ensure there would be no interference with emergency response and evacuation plans during construction activities. The CTMP would ensure that all public roads remain passable to emergency service vehicles during construction of the proposed Program or alternative routes would be clearly delineated, if needed. In addition, the CTMP would require emergency personnel be notified in advance of the proposed project schedule and notified of any proposed road closures, including planned detour routes. Therefore, with implementation of **Mitigation Measure TR-1**, impacts would be considered less than significant.

Mitigation Measure

Implement **Mitigation Measure TR-1**.

2.18 Tribal Cultural Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
TRIBAL CULTURAL RESOURCES —				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources. Code Section 5020.1(k), or	☐	☐	☐	☒
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

Discussion

California Assembly Bill (AB) 52, through its implementing regulations, requires that lead agencies consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project and who have requested in writing to be informed by the lead agency of proposed projects in the tribe's geographic area (PRC Section 21080.3.1[b] and [d]).

An SLF search conducted by the NAHC on November 19, 2019, indicates that Native American cultural resources are known to be located within the general Program area. The letter did not provide details on the resources identified, but recommended the Gabrieleño Band of Mission Indians – Kizh Nation be consulted regarding the resources.

On February 26, 2020, LADWP sent notification of the proposed project to California Native American tribal representatives identified by the NAHC as being traditionally or culturally affiliated with the geographic area. The letter notified the tribes of the proposed Program, provided a description of the Program and location information, assured the Tribe of LADWP's commitment to confidentiality under PRC Section 21082.3(c), LADWP's contact information, and invited the tribes to respond within 30 days with their interest in AB 52 consultation. LADWP received responses to the AB 52 notification letters from two groups including the Chairman of the Gabrieleño Band of Mission Indians - Kizh Nation (Kizh Nation) and the Fernandeño Tataviam Band of Mission Indians (FTBMI). The results of the AB 52 consultation are summarized in the following paragraphs.

Gabrieleño Band of Mission Indians - Kizh Nation

On March 16, 2020, Andrew Salas, Chairman of the Kizh Nation, responded to LADWP's formal notification and requested consultation. On May 28, 2020, LADWP and Chairman Salas met via telephone. Chairman Salas provided documentation to LADWP including historic maps, excerpts about potential locations of villages, and lineal information. The documentation focused on the Tujunga and Pacoima washes as well as the villages of *Tuhungna* and *Muhungna* located at the mouth of Tujunga Canyon, approximately 5 miles east of the Program area's northernmost park (David M. Gonzales Recreation Center) and *Kawengna* located near present-day Studio City approximately 1.75 miles southeast of the Program area's southern-most park (Valley Village Park). Chairman Salas indicated that Program-related ground disturbance has a higher than average probability of encountering previously undisturbed resources due to its proximity to Tujunga Wash and Pacoima Wash. As a result of the consultation, no tribal cultural resources were identified; however, the City agreed to work with the Kizh Nation prior to construction to develop a plan for monitoring and to implement Native American monitoring during project ground disturbing activities.

Fernandeño Tataviam Band of Mission Indians

On March 26, 2020, Jairo Avila, Tribal Historic and Cultural Preservation Officer for the FTBMI responded to LADWP's notification letter via email. Mr. Avila stated the Program is located within FTBMI's ancestral area and requested formal consultation regarding the project pursuant to AB 52. Mr. Avila stated a review of FTBMI's resource database indicated a number of previously documented cultural resources are located in the vicinity of the Program area and expressed that Program-related ground disturbance should proceed with caution given the number of previously identified resources in the vicinity. Mr. Avila also requested copies of the cultural resources assessment report prepared for the Program as well as any excavation or grading plans.

On September 25, 2020, LADWP responded to Mr. Avila via email accepting his request for AB 52 consultation and to schedule a date and time for the consultation. On October 1, LADWP met with Mr. Avila via telephone to discuss the Program. Mr. Avila asked to review the proposed mitigation measures pertaining to cultural resources, and LADWP provided the draft measures following the phone call. Mr. Avila reviewed the mitigation measures and responded with minor edits to the measures including tribal consultation regarding the preparation of a cultural resources monitoring plans and the final disposition of prehistoric or Native American resources should they be discovered during Program construction. No tribal cultural resources were identified as a result of the consultation.

a.i) **No Impact.** No tribal cultural resources were identified as a result of the consultation with the Kizh Nation and the FTBMI. Therefore, no tribal cultural resources that are listed in or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k) would be impacted by Program implementation. No impact would occur.

Although no tribal cultural resources were identified as a result of the consultation, the City agreed to develop a plan for monitoring in coordination with the Kizh Nation prior

to construction and to implement Native American monitoring during project ground disturbing activities. Similarly, the revisions made to the cultural resources mitigation measures provided by the FTBMI will also be incorporated. As such, implementation of the revised mitigation measures and of **Mitigation Measure CUL-4**, which includes the preparation of a Cultural Resources Monitoring Plan and Native American monitoring, should be implemented.

a.ii) **No Impact**. As noted above under Section 2.18 (a.i), no tribal cultural resources were identified as a result of the consultation with the Kizh Nation and the FTBMI. Therefore, no tribal cultural resources that have been determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1, would be impacted by Program implementation. No impact would occur.

Although no tribal cultural resources were identified as a result of the consultation, the City agreed to develop a plan for monitoring in coordination with the Kizh Nation prior to construction and to implement Native American monitoring during project ground disturbing activities. Similarly, the revisions made to the cultural resources mitigation measures provided by the FTBMI will also be incorporated. As such, implementation of the revised mitigation measures and of **Mitigation Measure CUL-4**, which includes the preparation of a Cultural Resources Monitoring Plan and Native American monitoring, should be implemented.

2.19 Utilities and Service Systems

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
UTILITIES AND SERVICE SYSTEMS — Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** Construction of the proposed Program would require some water for dust control, which would be provided by imported water trucks. Wastewater generated during construction of the proposed Program would be minimal, consisting of portable toilet waste generated by construction workers. Wastewater generated during construction would be collected within portable toilet facilities. All wastewater generated in portable toilets would be collected by a permitted portable toilet waste hauler and appropriately disposed of at an identified liquid-disposal station. As required by State and local laws, the City would be required to identify existing underground utilities with the potential to be impacted or need to be relocated due to implementation of the proposed Program prior to the start of construction. Therefore, through implementation of State and local laws, and proper disposal of wastewater generated during construction, impacts would be less than significant.

The proposed Program is a stormwater collection project being implemented to help capture surface flow and divert stormwater runoff from the Tujunga Wash Central Branch storm drain to recharge the groundwater basin. As stated in Section 2.10 (a), the proposed Program would improve local water quality. The proposed stormwater retention and infiltration facilities are designed to reverse the impacts from urbanization on the natural hydrograph and water quality. The proposed Program would provide source control treatment of stormwater runoff prior to receiving waters, providing improved water quality through infiltration and treatment that would minimize the off-site transport of typical urban runoff pollutants. (EWMP 2015) In addition, the proposed project would

comply with the requirements of the MS4 Permit issued by the RWQCB. Operation of the proposed Program would not cause significant environmental effects. Impacts would be considered less than significant.

b) **No Impact.** Construction of the proposed Program would require minimal amounts of water for dust control, concrete mixing, and sanitary purposes. The proposed Program is a stormwater collection project being implemented to help capture surface flow and divert stormwater runoff from the Tujunga Wash Central Branch storm drain to recharge the groundwater basin. The proposed Program would not impact water supplies. No impact would occur.

c) **Less than Significant Impact.** As described in Section 2.18 (a), wastewater generated during construction of the proposed Program would be minimal, and would be collected by a permitted portable toilet waste hauler and appropriately disposed of at an identified liquid-disposal station. The proposed Program would construction a stormwater capture system and would not require wastewater treatment. Therefore, the proposed Program would not impact the wastewater treatment provider's capacity and impacts would be considered less than significant.

d) **Less than Significant Impact.** The waste generated during construction of the proposed Program would mainly consist of soil disposal as well as general construction debris and worker personal waste. A total of approximately 600,000 CY of soil for all project sites would be exported and disposed off-site (see Table 1-2). The construction contractor would be required to dispose of solid waste in accordance with local solid waste disposal requirements. In compliance with the California Integrated Waste Management Act of 1989 and the California Green Building Code, the proposed Program would be required to divert 50 percent of its construction waste from landfills. The remaining construction solid waste would be taken to a nearby landfill to the Program area to be determined by the construction contractor. The closest landfill to the proposed Program area would be the Burbank Landfill Site No. 3, which is located in the city of Burbank approximately 5.5 miles east from the proposed Program area. Burbank Landfill Site No. 3 has a permitted throughput of 240 tons per day, and has a remaining capacity of 5,174,362 cubic yards (CalRecycle 2020). The site accepts all forms of waste such as mixed municipal, construction/demolition, industrial and inert waste. The landfill's cease operation date is anticipated to be in the year 2053. Therefore, the landfill would have sufficient capacity to accommodate the proposed Program's disposal needs. Operation of the proposed Program would not generate minimal waste. City operation and maintenance staff would remove solid waste from the HDS units on a bi-monthly basis and dispose of the debris and pollutants at an appropriate disposal facility. Therefore, the proposed Program's impact on solid waste capacity of local infrastructure or solid waste reduction goals would be considered less than significant.

e) **Less than Significant Impact.** The proposed Program would comply with all federal, state, and local construction requirements during construction of the proposed Program. The proposed Program would be required to comply with the California Integrated Waste

Management Act of 1989 and the California Green Building Code requiring 50 percent diversion of its construction waste from landfills through reuse and recycling. Operation of the proposed Program would not generate solid waste. Impacts related to potential noncompliance with solid waste reduction statutes and regulations would be considered less than significant.

References

CalRecycle. 2020. Facility/Site Summary Detail: Burbank Landfill Site No. 3. Available at https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3561?siteID=1025. Accessed June 20, 2020.

2.20 Wildfire

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
WILDFIRE — If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Discussion

a) **Less than Significant Impact with Mitigation.** Construction of the proposed Program would not require construction activities within the public rights-of-way. As such the proposed Program would not be anticipated to interfere with any emergency response or evacuation plans. However, the proposed Program area could result in increased traffic due to slower moving construction vehicles entering and existing the proposed park project sites. Implementation of a Traffic Control Plan, as described in **Mitigation Measure TR-1**, would ensure there would be no interference with emergency response and evacuation plans. After construction, traffic would return to pre-project conditions and there would be no impairment of any emergency response plan or evacuation routes. Impacts would be considered less than significant with implementation of **Mitigation Measure TR-1**.

Mitigation Measure

Implement **Mitigation Measure TR-1**.

b) **Less than Significant Impact.** The proposed Program would be located at local parks within a highly urbanized area and would continue to be served by the Los Angeles Fire Department. According to the California Department of Forestry and Fire Protection (CAL FIRE), the proposed project would be located entirely within the Local Responsibility Area (LRA) of the City of Los Angeles. Within the LRA none of the project components would occur within a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2011). Further, the Program area does not include slopes nor prevailing winds that could exacerbate fire hazard. Additionally, during construction all

contractors and would have to comply with Public Resource Codes (PRC) Sections 4427, 4428, 4431, and 4442. Impacts would be considered less than significant.

c) **Less than Significant Impact.** As discussed, above the proposed Program would be located entirely within a non-VHFHSZ. Additionally, the proposed project does not include the installation or maintenance of associated infrastructure that could exacerbate fire risk. Once complete the proposed Program would be located mainly underground. All construction must comply with fire protection and prevention requirements specified by the California Code of Regulations (CCR) and Cal/OSHA. This includes various measures such as easy accessibility of firefighting equipment, proper storage of combustible liquids, no smoking in service and refueling areas, and worker training for firefighter extinguisher use. With adherence to applicable local and state regulations, impacts would be considered less than significant level.

d) **No Impact.** The proposed project is located in a relatively flat urbanized area, with minimal slope. Once construction of the proposed project is complete the project sites will be similar to existing conditions. The proposed project would not change the drainage pattern of the surrounding area and in the event of a fire the proposed project would not exacerbate downslope or downstream risk of flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes or slope instability. As such, no impact would occur.

References

California Department of Forestry and Fire Protection (CAL FIRE), 2011. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Available at: https://osfm.fire.ca.gov/media/5830/los_angeles.pdf. Accessed April 20, 2020.

2.21 Mandatory Findings of Significance

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
MANDATORY FINDINGS OF SIGNIFICANCE —				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

a) **Less than Significant Impact with Mitigation.** As discussed in Section 2.4, the Cooper's hawk, a California Species of Special Concern which was observed at two park project locations, is the only special status species with the potential to be impacted by proposed Program construction. Migratory birds may utilize the proposed park sites, including but not limited to trees, vegetation, and building structures for foraging and breeding purposes. However, the proposed Program would implement **Mitigation Measure BIO-1** to ensure that impacts to special-status species and migratory birds would be less considered less than significant.

As discussed in Section 2.5, three historic architectural resources were identified within the proposed Program area and proposed construction could have the potential to impact these resources. IN addition, proposed ground disturbance has the potential to encounter archaeological and/or paleontological resources, or human remains. However, implementation of **Mitigation Measures CUL-1 through CUL-6** would reduce these impacts to less than significant.

Mitigation Measures

Implement **Mitigation Measures BIO-1** and **CUL-1 through CUL-6**.

b) **Less than Significant Impact with Mitigation.** A cumulative impact could occur if the Program would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. The proposed Program analyzed all park projects together, in order to account for the cumulative impacts of the Program. No direct

significant impacts were identified for the proposed project that could not be mitigated to a less than significant level. However, when combined with other projects within the vicinity, the proposed Program may result in a contribution to a potentially significant cumulative impact.

The proposed Program does not include any agricultural resources that could be impacted and the proposed Program would have no effect on land use, population and housing, and tribal cultural resources. In addition, the proposed Program would have no impact or less than significant impacts to aesthetics, energy, GHG emissions, hydrology and water quality, mineral resources, public services, recreation, and utilities and service systems. As a result, cumulative impacts related to these resources would not occur.

Air quality, biological resources, cultural resources, geology and soils, hazardous materials, noise, and wildfire impacts that are generated during Program-related construction activities would be short-term and limited by the overall short construction period. Further, impacts related to the resource areas described above would be less than cumulatively considerable with implementation of mitigation measures. Therefore, the proposed Program would not result in any impacts that would be cumulatively considerable with implementation of mitigation measures.

Mitigation Measures

Implement **Mitigation Measures AQ-1, BIO-1, CUL-1 through CUL-6, GEO-1 through GEO-5, HAZ-1 through HAZ-3, NOI-1 through NOI-6**, and **TR-1**.

c) **Less than Significant Impact with Mitigation.** With implementation of mitigation measures included in this IS/MND, the proposed project would not result in substantial adverse effects to humans, either directly or indirectly.

Mitigation Measures

Implement **Mitigation Measures AQ-1, BIO-1, CUL 1 through CUL-6, GEO-1 through GEO-5, HAZ-1 through HAZ-3, NOI-1 through NOI-6**, and **TR-1**.