Final Initial Study/
Mitigated Negative Declaration
for
Aliso Creek – Limekiln Creek
Restoration Project
W.O. EW40062A

December 2016

City of Los Angeles
Environmental Management Group
CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
MITIGATED NEGATIVE DECLARATION
(Article I, City CEQA Guidelines)

LEAD CITY AGENCY AND ADDRESS: Los Angeles City Engineer
Bureau of Engineering, EMG
1149 Broadway, Suite 600
Los Angeles, CA 90015-2213

COUNCIL DISTRICT 12

PROJECT TITLE: ALISO CREEK – LIMEKILN CREEK RESTORATION PROJECT (W.O. EW40026A)

T.G.
Page 854, Grid B1
S.C.H. 2016101027

PROJECT LOCATION: The project is located at 8956 Vanalden Avenue within the Northridge Community Plan Area, Council District 12, in the City of Los Angeles.

DESCRIPTION: The proposed project includes stormwater BMPs to treat urban runoff and stormwater to reduce pollutant in-flow from Aliso and Limekiln Creeks, which ultimately flows to the River. Proposed BMPs include in-channel diversions, pump stations, pretreatment devices, subsurface piping, vegetated biofiltration basins, and electrical and instrumentation equipment.

Urban runoff and stormwater from the Channels and an existing 102-inch storm drain pipe would be diverted to pretreatment devices for removal of trash and debris. The partially treated water would then be conveyed to three biofiltration basins. The BMP footprints would be designed to maximize the water quality benefits while meeting the allocated construction budget. The BMPs would be designed to mimic natural hydrologic processes and minimize the amount of pollutants in the stormwater before it is discharged into the River. The basins would be designed to preserve the natural look of the park. Interpretive signage would be included to inform users of the BMP multiple benefits.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY:

FINDING: The City Engineer of the City of Los Angeles has determined the proposed project will not have a significant effect on the environment. See attached Initial Study.

SEE THE ATTACHED PAGES FOR ANY MITIGATION MEASURES IMPOSED

Any written objections received during the public review period are attached, together with the responses of the lead City agency.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED

PERSON PREPARING THIS FORM: Shokoufe Marashi

ADDRESS: 1149 S. Broadway, Suite 600, MS 939

Los Angeles, CA 90015

TELEPHONE NUMBER: (213) 485-5759

SIGNATURE (Official): Maria Martin, Environmental Affairs Officer

Environmental Management Group

DATE: 1/5/17
I. INTRODUCTION

A. Purpose of an Initial Study

The California Environmental Quality Act (CEQA) was enacted in 1970 for the purpose of providing decision-makers and the public with information regarding environmental effects of proposed projects; identifying means of avoiding environmental damage; and disclosing to the public the reasons behind a project’s approval even if it leads to environmental damage. The Bureau of Engineering Environmental Management Division (EMD) has determined the proposed project is subject to CEQA and no exemptions apply. Therefore, the preparation of an Initial Study (IS) is required.

An IS is a preliminary analysis conducted by the lead agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the initial study concludes that the project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report (EIR) should be prepared; otherwise the lead agency may adopt a Negative Declaration (ND) or Mitigated Negative Declaration (MND).

The IS/MND contained herein have been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended July 31, 2002).

B. Document Format

This MND is organized into eight sections as follows:

Section I, Introduction: provides an overview of the project and the CEQA environmental documentation process.

Section II, Project Description: provides a description of the project location, project background, project components, and proposed construction and operation.
Section III, Existing Environment: provides a description of the existing environmental setting with focus on features of the environment, which could potentially affect the proposed project or be affected by the proposed project.

Section IV, Environmental Effects/Initial Study Checklist: presents the City's Checklist for all impact areas and mandatory findings of significance. Includes discussion and identifies applicable mitigation measures.

Section V, Mitigation Measures: provides the mitigation measures that would be implemented to ensure that potential adverse impacts of the proposed project would be reduced to a less than significant level.

Section VI, Preparation and Consultation: provides a list of key personnel involved in the preparation of this report and key personnel consulted.

Section VII, Determination – Recommended Environmental Documentation: provides the recommended environmental documentation for the proposed project; and,

Section VIII, References: provides a list of reference materials used during the preparation of this report.

Section IX, Comments/Response to comments: provides response to comments received during public review.

C. CEQA Process

Once the adoption of a ND (or MND) has been proposed, a public comment period opens for no less than twenty (20) days or thirty (30) days if there is state agency involvement. The purpose of this comment period is to provide public agencies and the general public an opportunity to review the initial study and comment on the adequacy of the analysis and the findings of the lead agency regarding potential environmental impacts of the proposed project. If a reviewer believes the project may have a significant effect on the environment, the reviewer should (1) identify the specific effect, (2) explain why it is believed the effect would occur, and (3) explain why it is believed the effect would be significant. Facts or expert opinion supported by facts should be provided as the basis of such comments.

After the close of the public review period, the Board of Public Works considers the ND or MND, together with any comments received during the public review process, and makes a recommendation to the City Council on whether or not to approve the project. One or more Council committees may then review the proposal and documents and make its own recommendation to the full City Council. The City Council is the decision-making body and also considers the ND or MND, together with any comments received during the public review process, in the final decision to approve or disapprove the project. During the project approval process, persons and/or agencies may address either the Board of
Public Works or the City Council regarding the project. Public notification of agenda items for the Board of Public Works, Council committees and City Council is posted 72 hours prior to the public meeting. The Board of Public Works Agenda is available via the internet at http://www.bpw.lacity.org/. The Council agenda can be obtained by visiting the Council and Public Services Division of the Office of the City Clerk at City Hall, 200 North Spring Street, Suite 395; by calling 213/978-1047, 213/978-1048 or TDD/TTY 213/978-1055; or via the internet at http://www.lacity.org/city-government/elected-official-offices/city-council-and-committeemeeting.

If the project is approved, the City will file a Notice of Determination with the County Clerk within 5 days. The Notice of Determination will be posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the project, and to issues presented to the lead agency by any person, either orally or in writing, during the public comment period.

As a covered entity under Title II of the Americans with Disabilities Act (ADA), the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services, and activities.
II. PROJECT DESCRIPTION

A. Introduction

The proposed project is comprised of three distinct construction sequences. The commencement of the following sequences may be overlapped and will not necessarily flow linearly.

- **Sequence 1 – Clearing, Grubbing, Excavation, and Site Preparation**
- **Sequence 2 – Stormwater Facilities**
- **Sequence 3 – Landscape, Irrigation, and Miscellaneous Amenities**

**Sequence 1 – Clearing, Grubbing, Excavation, and Site Preparation:** This sequence includes removal of existing site features including a small portion of concrete in Limekiln Creek Channel, clearing and grubbing, and excavation for pipes and bio retention areas and grading. At the end of this sequence, the site’s soil will be left in a stabilized, rough-graded finish.

**Sequence 2 – Stormwater Facilities:** Sequence 2 of the proposed project construction would divert a portion of the flows from Aliso Creek, Limekiln Creek, and the existing 102-inch storm drain pipe to the site and construct and operate appropriate, beneficial, and feasible stormwater best management practices (BMPs) within the site to reduce pollutants entering the Los Angeles River. The BMPs include pretreatment devices and bioretention (bifiltration) basins. Other stormwater facilities include diversions structures, pump stations, and on-site pipes along with associated electrical and instrumentation equipment.

**Sequence 3 – Landscape, Irrigation, and Miscellaneous Amenities:** Sequence 3 of the proposed project would include an improved pathway, aesthetic, and educational amenities that would further transform the project site to supplement the BMPs and associated water quality benefits. Plant material for the project will be native and drought-tolerant. Plant material that will be located in the new basins will be selected to be able to withstand ponding fluctuations and saturated soil conditions. A trail, included in Sequence 3, will expand the existing Vanalden Park. Lodge-pole fences will serve as barriers to prevent unwarranted access to areas where ponding of dry- and wet- weather diverted flows may be present.

B. Location

The Aliso Creek – Limekiln Creek Restoration Project (proposed project) is located in the City of Los Angeles, in the Northridge Community at 8956 Vanalden Avenue, west of Golden State Freeway (Interstate 5), north of Ventura Freeway (US Highway 101), south of Ronald Reagan Freeway (CA State Route 118), and East of Chatsworth Reservoir. The project is located at the confluence of the concrete-lined Aliso and Limekiln Creek flood control channels, both owned and maintained by Los Angeles County Department of Public Works (LACDPW). The 11.8-acre site is bounded by Vanalden Avenue to the
west; the Wilkinson Multipurpose Senior Center, a parking lot, residential housing to the north; and east; and Union Pacific Railroad track to the south. The majority of Vanalden Park is within the project site as is the LACDPW Debris Basin, which is located in line with the Aliso Creek drainage. Wilber Debris Basin is not part of the project. Figure 1 illustrates the project site.

B. Setting
The project site consists of approximately 11.8 acres of land and includes the concrete-lined channels of Aliso Creek and Limekiln Creek, which merge at the southern end of the site (Figure 4). The Wilbur Debris Basin occupies a 2.6 acre portion of the site along Aliso Creek for flood control purposes. No work is being proposed in the Wilber Debris Basin. A portion of the existing City of Los Angeles Vanalden Park occupies the northwestern portion of the site. The area of Vanalden Park within the project site consists of open space lawn areas with scattered trees. The remaining areas at the project site consist of undeveloped open space areas with little to no vegetation. The project is bordered by a mobile home park, the developed portions of the Vanalden Park and Wilkinson Multi-purpose Senior Center, and residential developments to the west, north, and northeast. The southern end of the project is bordered by Union Pacific and Los Angeles Metropolitan railroad lines. Commercial/industrial properties are located at the southeast corner of the project site and south of the railroad lines.

The project site is relatively flat. Chain-link fencing encloses the portions of the site to the south of Limekiln Creek and to the east of Aliso Creek and the Wilbur Debris Basin. The Wilbur Debris Basin located in the northeastern portion of the site is approximately 15 feet deep and is not a part of the project.

C. Background
Water quality in the Upper Los Angeles River Area (ULARA) watershed is addressed by numerous federal, state, and local regulations. The Los Angeles Regional Water Quality Control Board (Regional Board or LARWQCB) has designated Existing and Potential Beneficial Uses for the Surface water in Reach 5 of the Los Angeles River near the project site:

- Existing Water Contact Recreation (REC-1)
- Existing Non-Contact Water Recreation (REC-2)
- Existing Warm Freshwater Habitat (WARM)
- Existing Wildlife Habitat (WILD)
- Existing Wetland Habitat (WET)
- Existing Groundwater Recharge (GWR)
- Potential Municipal and Domestic Supply (MUN)
- Potential Industrial Service Supply (IND)

The Clean Water Act (CWA) of 1972 is the governing federal regulation for water quality in the United States. The CWA provides the legal framework for several water quality regulations, policies and programs, including the National Pollutant Discharge Elimination
System (NPDES), effluent limitations, water quality standards, pretreatment standards, anti-degradation policy, non-point source discharge regulation, and wetlands protection. The United States Environmental Protection Agency (USEPA) has delegated the responsibility for administration of portions of the CWA to the states, which are required to develop a list, known as the 303(d) List, of impaired water bodies within their jurisdictions and the pollutants for which they are impaired. The states must then establish a total maximum daily load (TMDL) (a maximum limit for a specific pollutant that a water body can receive and still meet water quality standards) for the listed pollutants of each impaired water body found within its region (Technical Steering Committee, 2004).

Aliso Creek is designated as an impaired water body by the LARWQCB. Impairments for Aliso Creek identified on the 303(d) List (2010) include copper, fecal coliforms, and selenium. Limekiln Creek is not listed as an impaired body of water by the LARWQCB. Federal requirements and delegated State Authority impose greater quality limits on water bodies by assessing the total maximum daily load (TMDL) of specific compounds that a water body can receive without becoming impaired. The CWA requires a TMDL (a maximum limit for a specific pollutant that a water body can receive and still meet water quality standards) to be developed to restore impaired water bodies to their beneficial uses. Existing TMDLs exist in Aliso Creek for Selenium. TMDLs for Fecal Coliform and Copper are estimated to be completed in 2019.

Typical sources of contamination in urban runoff include:

- Oil, grease, and gasoline from vehicles leaking onto roadways and parking areas
- Pesticides, herbicides, and fertilizers from agricultural and urban areas
- Sediment from construction operations
- Metals from vehicle exhaust, rust, paint, tires, and engine parts

Urban runoff from a site has the potential to contribute trash, oil and grease, nutrients, suspended solids, metals, hydrocarbons, and pathogens to the storm water conveyance system. Targeted pollutants for the project site include the following:

- Bacteria
- Metals

Intercepting a portion of wet and dry weather runoff prior to its release into Aliso Creek is expected to reduce pollutant loads and improve water quality. In addition, Aliso Creek is a tributary to Los Angeles River and reducing pollutant loads will ultimately improve water quality in Los Angeles River.

**Los Angeles River Revitalization Master Plan:**

The Los Angeles River Revitalization Master Plan (LARRMP), approved in April 2007, is a plan for implementing a variety of improvements along the Los Angeles River (or River) to create a City Landmark and be a catalyst for a sustainable environment. The long-term vision is the restoration of a continuous riparian ecosystem along the River Corridor. The
LARRMP focuses on four core principles:

1.) Revitalize the River – store peak flows to reduce flow velocities in the channel in order to facilitate ecological restoration and access.
2.) Green the Neighborhood – create a continuous river greenway to reconnect communities to the river and to each other through a network of bikeways, and pedestrian paths.
3.) Capture Community Opportunities – encourage neighborhood enhancement, empowerment, and reinvestment where appropriate, including targeting brownfields for redevelopment, and encouraging the creation of new recreational spaces.
4.) Create Value: improve the quality of life for residents, increase the attractiveness of the City, and increase economic prosperity.
Figure 1: Regional Vicinity Map
D. Purpose

The overall objective of this project is to improve the existing water quality of dry- and wet-weather stormwater from the creeks prior to discharging back into Aliso Creek, Limekiln Creek and ultimately to the Los Angeles River. Although the primary benefit of this project, and of all the Proposition O projects, is water quality the benefits are not exclusive to water quality. While we expect the pollutant loads to decrease dramatically and exceed the goals of the Proposition O Concept Report for the Aliso Creek – Limekiln Creek Restoration Project, this project will also provide multiple benefits to the neighborhood by providing improved park facilities, educational opportunities, wildlife habitats, and by restoring vegetation. This project will also improve climate change adaptability, increase sustainability, replenish natural resources, and improve the community’s quality of life. It is important to maximize the benefits of this project since it would complement the Los Angeles River Ecosystem Restoration Feasibility Study, a joint U.S. Army Corps of Engineers and City of Los Angeles project.

This project shares similar goals with the following Los Angeles River-related planning documents:

- Los Angeles River Ecosystem Restoration Feasibility Study
- Los Angeles River Revitalization Master Plan
- Los Angeles River Master Plan and Landscaping Guidelines
- River Improvement Overlay (City Ordinance 183145)
- Northeast LA Riverfront Collaborative Northridge Community Plan

The project will “serve the recreational, environmental, health and safety needs of the community and protect environmental and aesthetic resources” as listed as Goal 5 in the Northridge Community Plan, in which the project is located.
Figure 2: Aliso Creek – Limekiln Creek Restoration Project – Watershed Drainage Areas
E. Proposed Project

The project site is divided into the following four subareas:

- **Area 1** – A portion of Vanalden Park, owned and maintained by the City of Los Angeles Department of Recreation and Parks (Recreation and Parks), which currently is an open space, will be developed with biofiltration basins, subsurface irrigation and an improved decomposed granite pathway. Existing park land will not be altered.

- **Area 2** – Wilbur Debris Basin, owned and maintained by the Los Angeles County Flood Control District (LACFCD), will not be altered and is outside the project limits.

- **Area 3** – An open space, owned by the City of Los Angeles, will be improved with biofiltration basins and subsurface irrigation.

- **Area 4** – An open space, owned by the LACFCD, will be improved with biofiltration basins and subsurface irrigation.

The project will include the design and construction of stormwater BMPs to treat urban runoff and stormwater to reduce pollutants in flow from Aliso and Limekiln Creeks, which ultimately flows to the Los Angeles River. Proposed BMPs include in channel diversions, pump stations, pretreatment devices, subsurface piping, vegetated biofiltration basins and electrical and instrumentation equipment.

Urban runoff and stormwater from Aliso Creek, Limekiln Creek channels, and an existing 102-inch storm drain pipe will be diverted to pretreatment devices and pump stations located west of the Wilbur Debris Basin and southeast part of area 3. The partially treated water will then be conveyed to three biofiltration basins (Area 3, 4, and 1) located on the southeast, south, and west portions of the project area. As previously stated due to the pump limitations and the large drainage area relative to the available implementation space, the BMP footprints do not have sufficient capacity to divert and treat the 85th percentile, 24-hour storm event. For this reason, the BMP footprints will be designed to be built as large as possible to maximize the water quality impacts while meeting the allocated construction budget. As a result, the treated water and overflow is eventually redirected back to the creeks that ultimately drain to Los Angeles River.

The BMPs would be designed to mimic natural hydrologic processes and minimize the amount of pollutants in the stormwater before it is discharged into the Los Angeles River.

The biofiltration basins will be made up of natural materials including native plants and engineered soil media. The basins will capture and detain stormwater to allow it to be filtered through the soil media to remove particles and pollutants (see Figure 4 for examples). For this project, the proposed basins would have an approximate excavation depth of up to 5 feet and a ponding depth of one to two feet to detain and filter diverted dry and wet-weather runoff. Once the flow is filtered it is discharged back to the creek. The basins would be designed to preserve the natural look of the park. Interpretive
signage would be included to inform users of the BMP multiple benefits.

Figure 4: Examples of Bioretention Basins
Anne McCary Park in Wilmington, NC (left) and Fort Bragg (right)
(Source: Peck Park Canyon Enhancement Project Final Preliminary Design Report)

Figure 5: Project Areas
F. Proposed Project Details

The flow of dry and wet-weather is illustrated in Figure 5. Dry weather urban runoff from Aliso Creek channel will be diverted using an existing diversion structure, to a pretreatment device located in Area 1 for treatment. The treated water will then be pumped to three bioretention (biofiltration) basins (Area 1, 4, and 3) See Figure 5. Dry weather urban runoff and stormwater from Limekiln Creek will be diverted using a newly built diversion structure in the channel to pretreatment device located in area 3 for treatment. The water will then be pumped to three bioretention basins (Area 1, 4, and 3). The overflow of stormwater will be discharged from Area 3 to Aliso Creek channel and from Areas 1 and 4 to Limekiln Creek channel. The 102-inch storm drain pipe will be diverted to the pretreatment device located in southwest end of Area 3 and then pumped to bioretention basin in Area 3. The overflow from Area 3 will be discharged to the Aliso Creek Channel.

G. Project Elements, BMPs and Natural Treatment Systems

1. Stormwater Diversion Structure

In the vicinity of Vanalden Park, the project will involve diverting dry weather runoff from Aliso Creek and Limekiln Creek before it is introduced to the Los Angeles River. Diversion structures will be constructed at three locations: Limekiln Creek, the Aliso Creek 36-inch LACFCD diversion pipe, and the 102-inch storm drain that extends from Rayen Street to Aliso Creek.

The existing grated drop inlet diversion structure, located within Aliso Creek, upstream of the Wilbur Debris Basin, will remain active for this project. A 3-inch tall, stainless steel weir diversion plate is proposed to be installed within the existing maintenance hole along the existing 36-inch LACFCD pipe to divert dry weather flows from Aliso Creek.

To provide dry and wet weather diversion from Limekiln Creek, a grated drop inlet diversion structure (similar to the existing diversion structure in Aliso Creek) is proposed to properly divert 10 cubic feet per second (cfs).

To provide dry and wet weather diversion from the 102-inch storm drain pipe, a concrete drop diversion structure with a 12-inch tall, concrete diversion berm is recommended.

2. Diversion Pipeline

Diversion pipes will convey stormwater from the diversion structures to the treatment system of this project. A diversion pipeline from the Aliso Creek diversion structure will connect to a pretreatment device. The diversion pipeline will be 12-inch reinforced concrete pipe (RCP) and will be capable of conveying dry weather flows only.
A diversion pipe will connect the Limekiln creek diversion structure to the pretreatment device. This pipeline will be 36 inch RCP and will convey 10 cfs. A minimum slope of 0.5 percent will be required to convey 10 cfs to the pretreatment device.

A diversion pipe from the 102-inch storm drain pipe. A 36-inch RCP is proposed to convey the diverted flows to a pretreatment device. This pipeline will convey 10 cfs and will have a minimum slope of 0.5 percent.

3. Pretreatment

Storm water runoff transports sediment, trash, and debris that can compromise the performance of storm water facilities (including pumps) and pollute receiving waters. Pretreatment will be an integral component of the treatment strategies to extend the life of the system. It will be recommended in order to reduce the maintenance frequency of the Aliso Creek storm water facilities, focus maintenance efforts to a concentrated area, and bolster compliance with the Los Angeles River Trash TMDL.

A pretreatment device will provide treatment of the storm water prior to the pump station. The pretreatment device will provide a peak treatment capacity of 10 cfs. The recommended pretreatment device will reduce migration of gross solids into the bioretention (biofiltration) basins under high flows by fully capturing trash and debris. This feature will provide the greatest potential for capture of gross solids and provide the potential to meet the trash TMDL. The storage capacity in the system is not as great as other pretreatment device units and, although it will provide the greatest capture and most likely meet the trash TMDL, the unit will have to be cleaned twice annually. One pretreatment device will be located adjacent to the Aliso Creek 36-inch LACFCD diversion pipe and will treat flows from said 36-inch pipe and the Limekiln Creek diversion pipe. The other pretreatment device will be located adjacent to the 102-inch storm drain and the biofiltration basin to which it will ultimately supply the diverted runoff.

4. Pump Station

Due to the depth of the existing drainage facilities, the adjacent land grades, and the types of BMPs considered for the project, pumping systems will be required.

It is recommended that for both pump station, a 3 + 1 pump configuration be used. The pump station will have three duty pumps, each capable of pumping 50% of the peak design flow, plus an additional pump to be provided and stored offsite. The additional pump would be installed when a pump is removed for maintenance thereby providing redundancy.

Site conditions prescribe that this station be constructed below grade as to allow for maximum site use (i.e. recreational park activities). Additionally, to minimize noise from pump operations while providing for security, it is recommended that both pump and motors be installed below grade within a secure wet well. Finally, overall depth of pump station should be minimized so as to keep the construction out of the underlying groundwater table as much as possible, which has the corollary beneficial effect of
minimizing the Total Dynamic Head for station operations. For these reasons, a submersible pumping configuration is recommended.

5. Distribution Piping to Bioretention (Biofiltration) Basins

Force mains will be required to convey stormwater from the pump stations to biofiltration basins. For each basin, force mains constructed of ductile iron pipe and will deliver up to 10 cfs of dry and wet weather flows. There will be a total of 4 force mains.

6. Subsurface Irrigation

The project will be designed to utilize diverted dry and wet weather flows which will be used for plant establishment throughout the project’s life. To minimize treatment, irrigation will be supplied via subsurface application.

A subsurface irrigation system will be implemented on the project site in lieu of a traditional irrigation system. The subsurface irrigation system would be supplied by pressurized water from the pump stations. The delivery system is a non-pressurized and gravity-driven chamber system. As water flows through and fills up the chambers, suspended solids settle to the bottom and water dissipates into the surrounding soils and rises up to the root zone. Excess water will infiltrate into the subgrade.

The irrigation system will utilize diverted runoff (dry weather and wet weather flows). Given that the available runoff volume is based on historic estimates and may not be sufficient to irrigate the landscape for some periods during the summer months, the irrigation system will be designed to adjust the irrigation cycles based on available water. At minimum, the system will utilize the predicted dry weather flows, and will augment with wet weather flows when available.

7. Biofiltration

Bioretention basins are proposed in Areas 1, 3, and 4 to provide additional water quality benefits and promote biofiltration. As previously stated in Section 3, due to the pump limitations and the large drainage areas relative to the available implementation space, the BMP footprints do not have sufficient capacity to divert and treat the 85th percentile, 24-hour storm event. For this reason, the BMP footprints are assumed to be built as large as possible to maximize the water quality impacts. Additionally, due to the low filtration rates of the site soils in the upper 30 feet and the liquefiable soils below 30 feet (Geotechnical Study, Appendix D) in-site filtration is not considered for the project.

8. Overflow Structures to Creeks

Overflow structures and equalization pipes will be incorporated into the basin design. As flows increase in the Aliso and Limekiln Creek drainage channels, diverted storm water flows will fill the filtration basins. Equalization pipes will transfer rising flows to secondary basins, and overflow structures will discharge excess, treated, storm water water to the existing Aliso and Limekiln Creeks, and ultimately to the Los Angeles River.
G. Project Construction

Preliminary Construction Schedule

The construction is expected to begin August 2017 and last approximately 21 months. During the period leading up to construction, design, environmental documentation, and community outreach shall occur.

Construction Methods

Construction of the various elements of the proposed project would use cut and cover methods. Construction would occur in Areas 1, 3, and 4 (diversion structure, diversion pipelines, pretreatment structures, new force mains, filtration basins, and overflow structures). In sequence, the general process for cut and cover methods consists of site preparation, excavation, proposed pipe and structure installation, backfilling and compaction, and surface restoration.

The cut and cover construction method requires a staging area either on-site or off-site to temporarily store supplies and materials. A majority of the staging for the diversion structure, diversion pipeline, pretreatment devices, and new force main, overflow structure, and filtration basins would occur within the contractor work zone established in Vanalden Park. Workers will park along Vanalden Avenue. Access to Area 3 will be from the gate on Nordhoff Street to the north of the site. Area 4 will be accessed by the bridge over Limekiln Creek within the project limits.

Project construction is currently scheduled to start in August 2017 and end in May 2019 (approximately 21 months). Construction of the project elements are shown in Table 1.
Table 1: Construction Phasing

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<td>Pipelines (New gravity line, New Force Main, Overflow)</td>
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<td>Commissioning</td>
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In addition, construction would occur between the hours of 8 a.m. to 4:30 p.m. Monday through Friday. No construction would occur on Saturdays, Sundays, or national holidays unless necessary due to weather delays.

**Cut and Cover Construction Method**

Cut and cover construction is a method typically utilized to install pipelines and related structures, and larger underground structures. For pipelines, cut and cover construction usually progresses along the alignment with the maximum length of trench open at one time being approximately 500 feet in length with a work area of approximately 1,200 linear feet. For the work at Vanaldan Park, the maximum length of trench open would be approximately 200 feet. The following is a description of the phases of installing pipelines using cut and cover methods:

**Excavation and Shoring.** A trench would be excavated along the alignment using backhoes, excavators, or other types of excavation equipment. Portions of the trench adjacent to some utilities may be manually excavated. The excavated soil may be temporarily stored in single rows adjacent to the trenches, stored at off-site staging areas, or immediately hauled away off-site. Excavated soil that is not used as backfill will be hauled off site.

The size of the trench for the proposed pipelines (12-inch diameter diversion pipeline, 16-inch diameter new force main, 36-inch diameter diversion pipeline) would be up to approximately 6 feet wide. In addition, depending on the depth of adjacent substructures along the alignment, the depth of the trench would range from approximately 3 feet to 25 feet below the ground surface. As the trench is excavated, the trench walls are supported, or shored, typically with lagging and hydraulic jack cross members, although trench boxes may be used\(^1\). Steel or wood sheeting between H-beams (e.g., beam and plate) may also be used for shoring. Other similar shoring methods may be utilized. Utilities not relocated prior to trenching would be supported as excavation and shoring occurs.

If construction occurs in areas with high groundwater, the groundwater would be removed during the excavation of the trenches, usually by pumping it from the ground through dewatering wells that have been drilled along the alignment. The extracted groundwater would first be treated for any contaminants, if present, before being discharged to the storm drain system under permit issued by the LARWQCB, or to the sanitary sewer system under permit by the City.

**Pipe or Structure Installation and Backfilling.** Once the trench has been excavated and shored, pipe laying or structure installation begins. Bedding material (such as aggregate, sand or slurry) would be placed on the bottom of the excavation. Pipe

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\(^1\) Trenches greater than 5 feet deep require shoring to prevent the sides from caving in or collapsing (an Occupational Health and Safety Administration [OSHA] requirement).
segments or the structure would then be lowered into the trench and placed on the bedding. For pipelines, the segments would either be fitted together (the diversion pipelines, and overflow line would use reinforced concrete pipe segments with bell and spigot end configurations) or in the case of the new force main (made of ductile iron pipe), welded to one another at the joints or sealed by a friction-type joint. The amount of pipe installed in a single day varies, but is expected to range from 40 to 120 feet per day for the proposed project. Appurtenant structures such as maintenance hole structures would be installed as appropriate.

For structures such as the diversion structure, tie-in work would be performed, and the structure formed and casted in place. For pre-made structures such as the pretreatment device, the structure would be positioned in the excavation, and connected to appurtenant facilities. After laying the pipe or installing the structure, the excavation would be backfilled with aggregate and/or soil and compacted. Any portion of the trench that remains open at the end of each work day would be covered with steel plating for safety reasons. Access to larger open excavations would be prevented by security fencing.

**Surface Restoration.** Any portion of the roadway or surface damaged as a result of construction activities would be repaved and/or restored in accordance with all applicable City of Los Angeles Department of Public Works (LADPW) standards. Once the pavement has been restored, traffic delineation (restriping) would also be restored.

**Site Work.** In addition to surface restoration, once the work in the park has been completed, site work would commence. Site work includes such activities as the installation electrical and instrumentation work, and landscaping and restoration of the park.

**Cut and Cover Construction Variations**

Each contractor utilizes different equipment and follows slightly different work practices, so variations from the above methods may occur.

**Construction Equipment**

Construction of the project elements would overlap with one another, with multiple concurrent construction zones. The types of equipment associated with the worst-case or most extensive construction phase are provided in Table 2.
### Table 2: Construction Equipment and Workforce Estimates*

<table>
<thead>
<tr>
<th>Construction Task</th>
<th>Equipment</th>
<th>Number</th>
<th>HP</th>
<th>Usage %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Storm Drain Diversion</td>
<td>Excavators</td>
<td>1</td>
<td>200</td>
<td>50</td>
</tr>
<tr>
<td>(pipeline, pretreatment device, return line, overflow line)</td>
<td>Backhoe/Loaders</td>
<td>1</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td></td>
<td>Saw Cuter</td>
<td>1</td>
<td>100</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>Compressor</td>
<td>1</td>
<td>50</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>Vibratory Roller</td>
<td>1</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td></td>
<td>Sweeper/Street Cleaner</td>
<td>1</td>
<td>200</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>Water Truck</td>
<td>2</td>
<td>1000 gal</td>
<td>100</td>
</tr>
<tr>
<td></td>
<td>Workers</td>
<td>7</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Haul Trips/Day</td>
<td>5</td>
<td>300</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Supply Trips/Day</td>
<td>5</td>
<td>300</td>
<td></td>
</tr>
<tr>
<td>New Force Main</td>
<td>Backhoe/Loaders</td>
<td>1</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td></td>
<td>Saw Cuter</td>
<td>1</td>
<td>50</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>Jack Hammer</td>
<td>1</td>
<td>50</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>Vibratory Roller</td>
<td>1</td>
<td>50</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>Water Truck</td>
<td>1</td>
<td>1,000 gal</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>Workers</td>
<td>10</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Haul Trips/Day</td>
<td>5</td>
<td>300</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Supply Trips/Day</td>
<td>5</td>
<td>300</td>
<td></td>
</tr>
<tr>
<td>Force main Rehabilitation (Lining)</td>
<td>Backhoe/Loaders</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Water Truck</td>
<td>1</td>
<td>1000 gal</td>
<td>100</td>
</tr>
<tr>
<td></td>
<td>Lining Truck</td>
<td>1</td>
<td>300</td>
<td>100</td>
</tr>
<tr>
<td></td>
<td>Compressor</td>
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<td>Workers</td>
<td>8</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Steam Truck/Boiler</td>
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<td>100</td>
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<tr>
<td></td>
<td>Supply Trips/Day</td>
<td>2</td>
<td>300</td>
<td></td>
</tr>
</tbody>
</table>

Notes and Assumptions: Workers and cement trucks travel 20 miles one-way. Haul, and supply trucks travel 30 miles one-way.

* Information provided in Table 2 is an estimate only; the actual equipment types and uses shall be decided by the contractor at a later date.

### Operation and Maintenance

Operation and maintenance would be the responsibility of the LADPW Bureau of Sanitation (SAN) and Recreation & Parks. The SAN would be responsible for the BMP elements and Recreation & Parks would continue to maintain the park, including the
landscape and the irrigation system after the improvements have been completed.

An Operations and Maintenance program would be prepared for the BMPs and the landscape and irrigation as a part of the detailed construction phase. The program is anticipated to include maintenance recommendations provided by the manufacturers to ensure that the structural BMPs perform optimally. Once constructed, the proposed improvements would not change the existing use of the park or increase its overall size. Operation and maintenance procedures would be performed in accordance with a Master Agreement between the LADPW and Recreation & Parks for the construction and maintenance of Proposition O projects, as supplemented by a project-specific Memorandum of Understanding for this project.

Anticipated operations and maintenance activities would include, but not be limited to the following:

- Recreation & Parks would be responsible for maintenance of new irrigation systems

Many operation and maintenance activities are similar across BMPs, such as periodic inspection of surface drainage systems to ensure clear flow lines, repair of eroded surfaces, adjustment or repair of drainage structures, soil cultivation or aeration, care of plant materials, replacement of dead plants, replenishment of mulch cover, irrigation, fertilizing, pruning and mowing.

General maintenance activities for the two major categories of structural facilities (filtration and biofiltration/filtration) are as follows:

**Filtration BMPs**

- Mowing and maintaining upland vegetated areas if applicable.
- Cleaning and removing debris after major storm events.
- Cleaning out accumulated sediment.
- Repairing or replacing stone aggregate.
- Maintaining inlets and outlets.
- Removing accumulated sediment from forebays or sediment storage areas when 50 percent of the original volume has been lost.

**Biofiltration and Filtration BMPs**

- Removing trash and debris from control openings.
- Watering and mowing vegetated areas.
- Removing and replacing all dead and diseased vegetation.
- Stabilizing eroded side slopes and bottom.
- Repairing erosion areas.
• Mulching void areas if needed.
• Maintaining inlets and outlets.
• Repairing leaks from the sedimentation chamber or from deteriorating structural components.
• Removing the top few inches of media and cultivating the surface when the filter bed is clogged.

• Cleaning out accumulated sediment from the filter bed once depth exceeds approximately one half inch or when the filter layer no longer draws down within 24 hours.

Project Actions and Approvals

The proposed project and environmental documentation, including this IS/MND would require approval by the City of Los Angeles Board of Public Works and City Council. Additional anticipated approvals or permits for the proposed project include, but are not limited to the following:

• State Water Resources Control Board/LARWQCB, project review, Clean Water Act, Section 401 Certification, and NPDES General Construction Permit
• California Department of Fish and Wildlife Streambed Alteration Agreement
• Los Angeles County Department of Public Works Flood Control District, permit for modification to channels and storm drain system (under County jurisdiction)
• City of Los Angeles Department of Building and Safety, electrical and grading permits
• Los Angeles County Department of Public Health, permit for use of diverted water
• City of Los Angeles Department of Recreation and Parks, project and design review
• U.S. Army Corps of Engineers, Clean Water Act, Section 404 Permit

The analysis in this document assumes that, unless otherwise stated, the proposed project will be designed, constructed and operated following all applicable laws, regulations, ordinances and formally adopted City standards (e.g., Los Angeles Municipal Code and Bureau of Engineering Standard Plans). Construction will follow the uniform practices established by the Southern California Chapter of the American Public Works Association (e.g., Standard Specifications for Public Works Construction and the Work Area Traffic Control Handbook) as specifically adapted by the City of Los Angeles (e.g., The City of Los Angeles Department of Public Works Additions and Amendments to the Standard Specifications For Public Works Construction [AKA "The Brown Book," formerly Standard Plan S-610]).
III. EXISTING ENVIRONMENT

The proposed project is located in the City of Los Angeles, in the Northridge Community at 8956 Vanalden Avenue, west of the Golden State Freeway (Interstate 5), north of the Ventura Freeway (US Highway 101), south of the Ronald Reagan Freeway (CA State Route 118), and East of the Chatsworth Reservoir. The project is located at the confluence of the concrete-lined Aliso and Limekiln Creek flood channels, both owned and maintained by Los Angeles County Department of Public Works (LACDPW). The 11.8-acre site is bounded by Vanalden Avenue to the west; the Wilkinson Multipurpose Senior Center, a parking lot, residential housing to the north; and east; and Union Pacific Railroad track to the south. The majority of Vanalden Park is within the project site as is the LACDPW Wilbur Debris Basin, which is located in line with the Aliso Creek drainage. The project site is divided into four areas and occupies about 11.8 – acres and consists of a portion of Vanalden Park.

Area 1, owned by Recreation and Parks, is approximately 4.6 acres and consists of a portion of Vanalden Park. An existing concrete swale flows through Area 1, collects runoff from its contributing watershed to the north, and discharges it into Limekiln Creek to the south.

Area 2 is approximately 3.1 acres and consists of the Wilbur Debris Basin, which is owned by the LACFCD. The debris basin was constructed to capture sediment and debris from the stormwater within Aliso Creek prior to its confluence with Limekiln Creek. An existing diversion structure, located upstream of the basin, diverts dry-weather flows from Aliso Creek and discharges it into Limekiln Creek. Existing vegetation is present along the slopes of the basin.

Two existing paved roads and an existing chain link fence surround the basin preventing unauthorized access.

An Initial Study/Mitigated Negative Declaration (MND) was prepared for the LACFCD’s Debris Basin Maintenance Program and dated December 2010, in accordance with the California Environmental Quality Act (CEQA). The MND was prepared to support the issuance of a Section 1605 Long-term Streambed Alteration Agreement from the California Department of Fish and Game (CDFG). The Section 1605 Agreement was developed since vegetation and sediment removal within the debris basin is considered to be under the jurisdiction of the CDFG. The agreement allows the LACFCD to continue maintenance on its debris basins.

Area 3 consists of open space and occupies about 2.3 acres. It is owned by the City of Los Angeles. Runoff from Area 3 flows into Aliso Creek via an existing concrete trapezoidal channel. An existing 102-inch storm drain pipe, owned by the LACFCD, from North Wilbur Avenue (east of Area 3) runs across Area 3 and discharges into Aliso Creek just north of the existing railroad tracks. An existing chain link fence also surrounds this area in order to restrict access. The City of Los Angeles will be required to enter into a use agreement for the diversion from the existing 102-inch storm drain.
Also, an easement will need to be obtained from Union Pacific in order to divert flows from the existing channel located adjacent to the railroad tracks.

Area 4 is a 1.8-acre area of open space owned by the LACFCD. Runoff from Area 4 flows into Limekiln Creek via sheet flow. An existing bridge located towards the west provides access to Area 4. The City of Los Angeles will be required to enter into a use agreement for this area.

The project site is relatively flat, sloping towards Aliso Creek and Limekiln Creek. It is at approximately 800 feet above mean sea level and is located about 2.8 miles north of the Los Angeles River. Per the Concept Report, the tributary watershed to Aliso Creek and Limekiln Creek is over 12,000 acres.

The project site is primarily within public open space, zoned OS-1XL and designated as Open Space in the City’s General Plan, and transportation and utility rights-of-way.

The site is not located within a State of California Earthquake Fault Zone (formerly known as Alquist-Priolo Special Studies Zone).

A portion of Area 1 referred to herein as the Vanalden Park is the more heavily used portion of the park, and which contains most of the park’s amenities such as picnic areas, restroom facilities, and open lawn areas.
IV. ENVIRONMENTAL EFFECTS/INITIAL STUDY CHECKLIST

This section documents the screening process used to identify and focus upon environmental impacts that could result from this project. The IS Checklist below follows closely the form prepared by the Governor’s Office of Planning and Research and was used in conjunction with the City's CEQA Thresholds Guide and other sources to screen and focus upon potential environmental impacts resulting from this project. Impacts are separated into the following categories:

- No Impact. This category applies when a project would not create an impact in the specific environmental issue area. A “No Impact” finding does not require an explanation when the finding is adequately supported by the cited information sources (e.g., exposure to a tsunami is clearly not a risk for projects not near the coast). A finding of “No Impact” is explained where the finding is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

- Less Than Significant Impact. This category is identified when the project would result in impacts below the threshold of significance, and would therefore be less than significant impacts.

- Less Than Significant After Mitigation. This category applies where the incorporation of mitigation measures would reduce a “Potentially Significant Impact” to a “Less Than Significant Impact.” The mitigation measures are described briefly along with a brief explanation of how they would reduce the effect to a less than significant level. Mitigation measures from earlier analyses may be incorporated by reference.

- Potentially Significant Impact. This category is applicable if there is substantial evidence that a significant adverse effect might occur, and no feasible mitigation measures could be identified to reduce impacts to a less than significant level. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required. There are no such impacts for the proposed project.

Sources of information that adequately support these findings are referenced following each question. All sources so referenced are available for review at the offices of the Bureau of Engineering, 1149 South Broadway Suite 600 Los Angeles, California 90015. Please call Shokoufe Marashi at (213) 485-5759 for an appointment.
1. AESTHETICS – Would the project:

a) Have a substantial adverse effect on a scenic vista?

Reference: L.A. CEQA Thresholds Guide (Sections A.1 and A.2); Northridge Community Plan
Comment: A scenic vista generally provides focal views of objects, settings, or features of visual interest; or panoramic views of large geographic areas of scenic quality, primarily from a given vantage point. A significant impact may occur if the proposed project introduced incompatible visual elements within a field of view containing a scenic vista or substantially altered a view of a scenic vista.

The proposed project would be located in and around Vanalden Park near the confluence of concrete-lined Aliso Creek and Limekiln Creek flood control channels. The project site is located within an urban setting and is surrounded by residential housing to the north and east; the Wilkinson multipurpose Senior Center and Union Pacific Railroad tracks to the south; recreational uses, and open space. There are no scenic vistas of the mountain or canyon available from the vicinity of the project area to residents, pedestrians, and motorists. Vanalden Park is the only feature of visual interest with its trees and open space.

The main project elements would be constructed below grade, with the exception of an enclosed in a box electrical control panel that would be located above grade. The control panel would be enclosed in a box that is not larger than 6 feet high, 6 feet long, and 2 feet wide, and it would be located along the chain-link fence southeast of the existing building for Area 1 and along the existing easterly fence line shown in Area 3. This location has been selected so it is visually not intrusive. The box would be located along the chain-link fence southeast, so it would not detract from the park.

The construction phase (Sequence 1 and 2) would temporarily affect the scenic quality of the park from areas overlooking the construction activities; since construction equipment will be temporarily staged in the Vanalden parking lot. However, construction activities would be temporary and only occur within the open areas of 1, 3 and 4 of the project site.

Sequence 3, the development of three biofiltration basins and native vegetation in the existing open spaces; would greatly enhance the existing views and natural settings.

The proposed project would enhance the visual resources close to Vanalden Park through improvement to the Area 1, 3 and 4. Landscaping used within the proposed biofiltration basins would be designed to preserve the natural look of the park. These BMPs would blend in or enhance the existing park views. Other BMPs such as pretreatment device would be below ground and not visible. The proposed project will improve the visual character of the project area.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Reference: California Scenic Highway Mapping System, L.A. CEQA Thresholds Guide (Sections A.1 and A.2); City of Los Angeles General Plan; Northridge Community Plan
Comment: A significant impact may occur where scenic resources within a state scenic highway would be damaged or removed as a result of the proposed project.

No scenic state highways are located within the project site or vicinity.
Issues

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Reference: L.A. CEQA Thresholds Guide (Sections A.1 and A.2)

Comment: A significant impact may occur if the proposed project introduced incompatible visual elements to the project site or visual elements that would be incompatible with the character of the area surrounding the project site.

No impact

See comment for 1 (a) above.

d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Reference: L.A. CEQA Thresholds Guide (Section A.4)

Comment: A significant impact would occur if the proposed project caused a substantial increase in ambient illumination levels beyond the property line or caused new lighting to spill-over onto light-sensitive land uses such as residential, some commercial and institutional uses that require minimum illumination for proper function, and natural areas.

No impact

2. AGRICULTURE AND FOREST RESOURCES – 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?

Reference: California State Department of Conservation Farmland Mapping and Monitoring Program website (http://www.conservation.ca.gov/dlrp/FMMP/Pages/Index.aspx); City of Los Angeles General Plan Conservation Element; Zone Information & Map Access System (ZIMAS)

Comment: A significant impact may occur if the proposed project were to result in the conversion of state-designated agricultural land from agricultural use to a non-agricultural use.

No impact

By the middle 1870, the North San Fernando Valley was a vast wheat farm. In 1887 H.C. Hubbard and F. M. Wright successfully farmed the 1100 acre tract they called Hawk Ranch, the first incarnation of Northridge. In 1910, it was sold for subdivision and renamed Zelzah, a biblical name signifying an oasis. When Southern Pacific first built the Chatsworth Tunnel to connect Los Angeles to Ventura and Santa Barbara in 1906, Zelzah was the only Valley stop. The location was at a well beneath the current intersection of Reseda Boulevard and Parthenia Street. By the 1920s the town was a shipping center for Producers of hazelnuts, citrus, olives, tomatoes, beans, asparagus, and cabbage. Northridge continued to be a rural community for many years, once known as the “horse capitol of the west.” Devonshire Downs was built for horse races in the 1940s and became home to the San Fernando Valley fair until it relocated in 1989. The name Zelzah was changed in 1929 to North Los Angeles for a short while, but residents preferred Northridge Village, shortened to Northridge in 1938. The Northridge community began to change and develop rapidly after World War II when many orchards disappeared and became suburban-type housing tracts to meet the demand for single-family homes by returning servicemen and their families. Also, commercial development took place as well, beginning in the 1950’s. In 1956, San Fernando Valley State College (later CSUN) was opened. Light industry moved into the area and a building boom began. In the early 1960’s, land use patterns had already developed in much of the
Issues

community, but there were still large areas of vacant or sparsely developed land.

Today, Northridge continues its development into a low-density and moderate density urban community. No prime or unique farmland or farmland of statewide importance exists within the project area or vicinity.

No prime or unique farmland, or farmland of statewide importance, exists within the project area or vicinity. The project site is not located on or near any property zoned or otherwise intended for agricultural uses.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Reference: California State Department of Conservation Farmland Mapping and Monitoring Program website (http://www.conservation.ca.gov/dlrp/FMMP/Pages/Index.aspx); City of Los Angeles General Plan Conservation Element, Zone Information & Map Access System (ZIMAS)

Comment: A significant impact may occur if the proposed project were to result in the conversion of land zoned for agricultural use, or indicated under a Williamson Act contract, from agricultural use to a non-agricultural use.

No land on or near the project site is zoned for or contains agricultural uses. The City of Los Angeles does not participate in the Williamson Act. Therefore, there are no Williamson Act properties in the City of Los Angeles and no impact from project construction and operation is anticipated.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined in Public Resources Code Section 4526)?

References: City of Los Angeles General Plan.

Comment: A significant impact may occur if the proposed project were to conflict with an existing zoning classification of forest land or timberland, or cause rezoning of an area classified as forest land or timberland.

The proposed project site is zoned open space (OS_1XL) and is a public park that supports passive recreational uses (Community Plan). There are no forest land or timberland areas in the vicinity of the project. Therefore, construction and operation of the project would not conflict with the existing zoning or cause rezoning of forest land or timberland resources, and no impact is anticipated.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

References: See 2 (c) above.

Comment: See 2 (c) above.

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?

Reference: See 2 (a) and 2 (c) above.

Comment: See 2 (a) and 2 (c) above.

3. AIR QUALITY – Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?
Issues

Reference: City of Los Angeles General Plan; L.A. CEQA Thresholds Guide (Sections B1 and B2); Northridge Community Plan; South Coast Air Quality Management District, 2012 Air Quality Management Plan, 2012

Comment: A significant impact may occur if the proposed project would conflict with or obstruct implementation of the applicable air quality plan.

The project is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is responsible for administering the Air Quality Management Plan (AQMP) for the Basin, which is a comprehensive air pollution control program for attaining state and federal ambient air quality standards. The most recent AQMP was adopted by the SCAQMD in February 2013. The AQMP was prepared by SCAQMD in partnership with the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (ARB), and is the legally enforceable blueprint for how the region will meet and maintain state and federal air quality standards. Projects that would be consistent with the 2012 AQMP would be considered less than significant for this impact.

Additionally, the City has an adopted Air Quality Element that is part of the General Plan. The Air Quality Element contains policies and goals for attaining state and federal air quality standards, while continuing economic growth, and includes implementation strategies for local programs contained in the AQMP. A significant impact would occur if the proposed project is inconsistent with the AQMP or the Air Quality Element of the City’s General Plan.

The Northridge Community Plan recognizes the need to ensure the availability of adequate public facilities. The proposed project would serve existing and intended land uses and would not include regional employment or population growth. The main objectives of the project are to meet regulatory requirements and improve water quality. Existing uses would not be changed. The project would also not result in a violation of air quality standards, as discussed in item 3 (b) below. The project would therefore be consistent with the AQMP.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Reference: L.A. CEQA Thresholds Guide (Sections B1 and B2); Model (CalEEMOD.2013.2.2.), 2013; South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993

Comment: A significant impact may occur if the proposed project would violate any SCAQMD air quality standard. The SCAQMD has set thresholds of significance for reactive organic gases (ROG), nitrogen oxides (NOx), carbon monoxide (CO), sulfur dioxide (SO2), and particulate matter (PM10) emissions resulting from construction and operation in the South Coast Air Basin.

SCAB is a severe non-attainment area for ozone (O3), a serious non-attainment area for particulate matter less than 10 microns in size (PM10), and a non-attainment area for particulate matter less than 2.5 microns in size (PM2.5). The SCAB is a maintenance area for carbon monoxide (CO) and nitrogen dioxide (NO2) and is in attainment for sulfur dioxide (SO2). In determining attainment and maintenance of air quality standards, the SCAQMD has established thresholds of significance for these and other criteria pollutants. A significant impact would occur if the proposed project results in substantial emissions during construction or operation, which would exceed the established thresholds.

Emissions generated by typical construction activities were modeled using the California Emissions Estimator Model (CalEEMOD), Version 2013.2.2. computer model recommended by the SCAQMD (Appendix A). This model allows the user to enter project-specific construction
information, such as the types, number, and horsepower of construction equipment, and the number, and length of off-site motor vehicle trips. Project construction emissions were estimated for construction worker commutes, haul trucks, and the use of off-road equipment.

It is mandatory for all construction projects in the SCAB to comply with SCAQMD Rule 403 for fugitive dust. Rule 403 fugitive dust control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, re-establishing ground cover as quickly as possible after ground disturbance, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site, and maintaining effective cover over exposed areas. Implementing these measures throughout construction activities would minimize fugitive dust emissions from all possible sources. Daily watering for fugitive dust control were included in the emissions estimates shown in Table 3.

As shown in Table 3, the estimate of maximum daily construction emissions would not exceed any of the SCAQMD’s construction thresholds of significance.

A summary of the emissions analysis is provided also in Table 3 below. Reduction credits used in the analysis include dust control measures in accordance with SCAQMD Rule 403 Fugitive Dust.

<table>
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<tr>
<th>Construction Emissions</th>
<th>VOC</th>
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<th>CO</th>
<th>SO2</th>
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<td>NO</td>
<td>NO</td>
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<tr>
<td>Operational Emissions</td>
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<td>0</td>
<td>0.11</td>
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<tr>
<td>SCAQMD Operations Thresholds (lbs/day)</td>
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<td>55</td>
<td>550</td>
<td>150</td>
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<tr>
<td>Significant Impact?</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
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</tbody>
</table>

Results of the analysis indicate that project-related construction would not exceed the established SCAQMD thresholds for criteria pollutants, and thus would be less than significant. Moreover, the contractors would be required to follow all applicable SCAQMD rules and regulations, including AQMD Rule 403 (Fugitive Dust) and 431 (Diesel Equipment), to minimize the tracking of soil from unpaved dirt areas to paved roads.

Likewise, results of the analysis indicate that project-related operations would not exceed the established SCAQMD thresholds for criteria pollutants. The total emissions from worker vehicle exhaust are considered negligible and should not exceed SCAQMD daily operational emission thresholds or have a significant impact on air quality.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal
or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?
Reference: L.A. CEQA Thresholds Guide (Sections B1 and B2); 2006 State Area Designation Maps (http://www.arb.ca.gov/desig/adm/adm.htm#state)
Comment: A significant impact would occur if the proposed project’s incremental air quality effects are considerable when viewed in connection with the effects of past, present, and future projects.

As indicated in 3(b) above, construction and operation emissions of the project would not exceed the SCAQMD’s established thresholds for criteria pollutants, and would not cause or contribute to local or regional air quality impacts during operation. Therefore, net increases of emissions generated by the project are not considered to substantially exacerbate a violation of air quality standards or significantly contribute to a cumulative air quality impact when combined with the effects of other projects. Therefore, air quality impacts would be less than significant.

d) Expose sensitive receptors to substantial pollutant concentrations?
Reference: L.A. CEQA Thresholds Guide (Sections B1, B2, and B3)
Comment: A significant impact may occur if construction or operation of the proposed project generated pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors include residences, board and care facilities, schools, playgrounds, hospitals, parks, child care centers, and outdoor athletic facilities.

Sensitive receptors within the vicinity of the proposed project site include the Wilkinson Multipurpose Senior Center and the residential housing to the north and east of the project. As discussed in 3(b) above, construction and operation emissions of the project would not result in a violation of air quality standards or substantially contribute to existing or projected air quality violations during construction or operation. As such, the Project is not expected to expose sensitive receptors, including senior center and nearby residences, to substantial pollutant concentrations. Therefore, impacts from construction and operation would be less than significant.

e) Create objectionable odors affecting a substantial number of people?
Comment: A significant impact would occur if the project created objectionable odors during construction or operation that would affect a substantial number of people.

During construction activities, sources of odor are diesel emissions from construction equipment and volatile organic compounds from sealant applications or paving activities. However, these odors would be temporary and localized. Nonetheless, applicable BMPs such as those in SCAQMD Rule 431 (Diesel Equipment) would, in addition to minimizing air quality impacts, also help minimize potential construction odors.

Laboratory tests have indicated that there are very low, non-detectable, non-hazardous levels of petroleum hydrocarbons in the soils at the project site. Some odors may be generated during project construction, however, this is anticipated to be minor and remain localized given that only low levels are present. No odors were detected in soil samples collected during a focused site assessment in 2015. Further, construction specifications would include plans to cover stockpiles of soils until material can be exported off-site, thereby containing the odors.
Air emissions, including odors, during operation are anticipated to be absent or minimal. Project elements such as the stormwater diversion structures are passive. The active components are the pump station systems that convey water through the force mains. The pump stations operate solely on electricity, which would not produce air emissions or odors.

During operation, odor would be most prevalent if there were a high concentration of organic material in the detention tank or bioretention (biofiltration) basins for a considerable length of time. This project does not include a detention tank. Typically stormwater runoff is low in biological oxygen demand (BOD), an indicator of bioactivity. Further, the facility is designed with two pre-treatment units (pretreatment device), which would capture most of the organic matter being carried by the stormwater before entering the bioretention basins. Therefore, runoff to the bioretention basins is not expected to contain a high degree of BOD, which would contribute to the potential for odors. Additionally, the residence time in bioretention basins is fairly short. The filtered water through the soil media will be captured in underdrains and directed back to the creeks. The Project would not involve the long-term accumulation of standing water in the bioretention basins; therefore, no potential source for odors is expected. The project would also be inspected, and maintained, and cleaned on a regular basis, which would further reduce the potential for buildup of material that could release odors. The BOS will evaluate the efficiency of the maintenance schedule and adjust its frequency accordingly to ensure that no unexpected odors are produced.

Therefore, impacts from construction and operation of Project related to odors are anticipated to be less than significant.

4. 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?

Reference: California Natural Diversity Database (CNDDB) Rare Finds Database, California Native Plant Society (CNPS); City of Los Angeles General Plan; L.A. CEQA Thresholds Guide (Section C); Biological Assessment Report, Tetra Tech, Inc., November 6, 2015 (Appendix B)

Comment: A significant impact may occur if the proposed project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the state or federal regulatory agencies cited.

The California Natural Diversity Database (CNDDB) which is maintained by the California Department of Fish and Wildlife (CDFW) was reviewed for information on known occurrences of sensitive species and communities that occur in the region (CDFW 2015). A 5-mile radius was used to query the CNDDB for occurrence records. The database lists occurrences of the following three species (one plant species, and two animal species). The CNDDB list is included in the Biological Assessment Report – Aliso Creek – Limekiln Creek Restoration Project.

The federally listed plant endangered species is the San Fernando Valley spineflower, and the two endangered animal species are Least Bell’s vireo and Arroyo toad. The state listed a threatened species (Swainson’s Hawk) and a plant rare species; Santa Susana tarplant. Although the database search indicated the three species were within 5-mile radius of the project site, a site survey conducted in September 9, 2015 did not identify rare, threatened, and/or
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endangered state or federally listed plant or animal species in the project area.

However, the project site is located at the confluence of the concrete-lined Aliso and Limekiln Creek flood channels, both owned and maintained by Los Angeles County Department of Public Works (LACDPW). Being in a highly urbanized area, the two creeks were armored a long time ago. Based on the relatively disturbed and isolated nature of the project area, the site currently lacks the minimum characteristics and conditions necessary to support adequate habitat for any listed endangered plant or animal species in the vicinity. No suitable native habitat for plants or animals currently exists within the project site; therefore no adverse impacts to sensitive biological species would occur as a result of the proposed project.

The proposed project would construct open space that would include water quality improvements such as bioretention basins within the vicinity of the Aliso and Limekiln Creeks and would result in positive impact to biological resources. Any excavation will comply with regulation of 401 and 1602 permits. The bioretention basins will be planted with native drought resistant species and seed mix as recommended in the Biological Assessment Report (Appendix B) to ensure sustainability of the habitat in the basins. Therefore construction and operation of the activities associated with the proposed project is anticipated to be less than significant.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulation or by the California Department of Fish and Game or US Fish and Wildlife Service?

Reference: See 4 (a) above.
Comment: See 4 (a) above.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Reference: CNDDDB, City of Los Angeles General Plan; L.A. CEQA Thresholds Guide (Section C); Wetland Delineation Report (Tetra Tech, 2015)
Comment: A significant impact may occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed.

During the site visit on September 9, 2015, a wetland delineation was completed to determine the jurisdictional areas within the retention basin (Wilbur Debris Basin) in Aliso Creek. An area of standing water and a well-defined ordinary high water mark (OHWM) was observed through the basin. The entire basin is within the top of bank for CDFW jurisdiction. The results of the wetland delineation are discussed in detail in the Wetland Delineation Report (Tetra Tech 2015).

The habitat between the main channel and the top of bank was primarily dominated by non-native weedy species and some native riparian species. The vegetation observed does not meet a defined native vegetation type. The intermixing of ruderal and native species is likely a result of scouring during high flows creating bare areas where non-natives readily establish. Along the defined drainage some native riparian species provide habitat for avian species and small mammal species. The list of plant species observed in Area 2 and the site photographs are provided in Appendix B. In addition, no nesting birds were observed during the biological survey completed on September 9, 2015.
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The Wilbur Debris Basin, owned and maintained by the Los Angeles County Flood Control District (LACFCD), will not be altered. No construction or operation will occur in area 2. Therefore, no impacts associated with the proposed project are anticipated.

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?

Reference: L.A. CEQA Thresholds Guide (Section C); Biological Assessment Report – Aliso Creek – Limekiln Creek Restoration Project (Tetra Tech, Inc., November 6, 2015)

Comment: A significant impact may occur if the proposed project interfered or removed access to a migratory wildlife corridor or impeded the use of native wildlife nursery sites.

The project area is located at the confluence of the concrete-lined Aliso and Limekiln Creek flood channels. Being in a highly urbanized area, the two creeks were armored long time ago. Based on the relatively disturbed and isolated nature of the project site and lack of a cohesive habitat, there are no native resident or migratory fish, wildlife species, wildlife corridors, nor native wildlife nursery site located on or in the vicinity of the project site. Construction and operation of the proposed project therefore would have no impact related to wildlife corridors, or 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?

Reference: L.A. CEQA Thresholds Guide (Section C); City of Los Angeles General Plan; Recreation & Parks Urban Forest Program

Comment: A significant impact may occur if the proposed project would cause an impact that was inconsistent with local regulations pertaining to biological resources.

The City of Los Angeles Board of Public Works tree removal policy requires replacing street trees at a two-to one ratio for trees that are removed from the right-of-way. RAP also has a tree replacement policy that can be found within the RAP’s Tree Care Manual. The policy requires “whenever trees are removed, the existing trees’ aggregate diameter, measures at breast height shall be replaced at an equal or greater rate of caliper of new trees.” None of the park trees would be removed as a result of the proposed project. However, should any of the trees within the right-of-way require removal; the proposed project would comply with the City’s tree removal policy. The contractor would be required to protect and maintain the existing trees located in the upland area of Vanalden Park during construction activities. No construction activities would be allowed to occur within the park as indicated on construction plans, and the contractor would be required to adhere to the requirements of the Oak Tree Ordinance (LAMC Section 46.00), Landscape Policy (LA City Council File Nos. 70-1899; 1322989 S-1 and S-2; and 145282 S-1), and Recreation & Parks’ Tree Preservation Policy as identified in the Recreation & Parks Urban Forest Program. Additionally, the contractor shall submit a tree and landscape irrigation plan for approval by Recreation & Parks prior to disabling the existing system. The Irrigation Plan shall ensure that portions of the park not under construction would not be affected by construction activities. In the event that a tree(s) is damaged during construction, replacement and/or measures would require negotiation with the Recreation & Parks. Therefore, construction and operation of proposed project would not conflict with the local tree ordinance, nor would it conflict with any other local ordinance protecting biological resources and the impact is less than significant.
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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?

Reference: City of Los Angeles General Plan; L.A. CEQA Thresholds Guide (Section C)

Comment: A significant impact may occur if the proposed project would be inconsistent with the provisions of the adopted habitat conservation plans of the cited type.

The proposed project is within two concrete channelized creek drainages, and is located in an urbanized community of the City of Los Angeles; and does not coincide with the boundaries of any adopted Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As a result, no impact from project construction and operation would occur.

5. CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations Section 15064.5?

Reference: L.A. CEQA Thresholds Guide (Section D.3); City of Los Angeles Cultural Heritage Commission Historic-Cultural Monuments (HCM) Listing; Northridge Community Plan; Cultural Resources Phase I Assessment, January 2016 (Appendix C); City of Los Angeles General Plan Conservation Element, Zone Information & Map Access System (ZIMAS)

Comment: A significant impact may result if the proposed project caused a substantial adverse change to the significance of a historical resource (as identified above).

Only one historic resource, and no prehistoric resources, has been recorded within the project. The historic resource within the Project, the Union Pacific Railroad (UPPR) track, runs along its south edge and has not retained its historic integrity. The railroad tracks are part of the Burbank- Chatsworth replacement line built around the turn of the century and incorporated into the Montalvo Cut-off in 1904. While the line is historic, the tracks are not. The line is still utilized by Metrolink, Union Pacific, and Amtrak. The concretelined Aliso and Limekiln canyon washes that run through the Project, though not recorded, are also historic and may be potentially significant based on their association with the concrete channelization; however it was not studied in the Cultural Resources Phase I Assessment. Of the remaining historic resources within a mile of the Project, only one is considered significant, the Faith Bible Church at 18531 Gresham Street.

Two other archaeological resources (both historic structures) and five historic properties have been recorded within a mile of the project. Of the seven, the Faith Bible Church and possibly Rancho Cordillera del Norte are considered historically significant. There are three additional resources located outside of the one-mile radius, including two prehistoric isolated artifacts and a pair of historic buildings at California State University Northridge. These resources are not considered historically significant.

No historic resources were found within one mile of the Project based on National Register or California Register. For additional information, refer to cultural resources phase I assessment, Appendix L, page 29.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations Section 15064.5

Comment: A significant impact may occur if the proposed project were to cause a substantial adverse change in the significance of an archaeological resource, which falls under the CEQA Guidelines section.
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cited above.

The Native American Heritage Commission’s search of the Sacred Lands Inventory did not find any previously recorded Native American traditional sites or places, but that does not prevent the possibility of the presence of subsurface sites or unrecorded Native American sites.

No other significant archaeological resources are present on the surface of the Project site, but that is likely the result of modern surficial disturbances. While few prehistoric resources have been recorded within the Project vicinity and only consist of isolated artifacts, the paths of two ephemeral stream courses are located within the Project making the area an ideal location for prehistoric visitation or occupation, and therefore create the potential for the presence of subsurface prehistoric archaeological resources, which could be found during excavation. When construction first occurred within the Project area, environmental laws that protected cultural resources were not in place and thus any resources present would not have been documented and may have ever been partially destroyed. Therefore there is a possibility that archaeological (in particular prehistoric) resources are present beneath the surface and could be encountered during Project excavations.

In the event that archaeological resources are found during excavation and grading in the upper five feet soil, Mitigation measure CULT – 1 would be implemented to ensure that any potential impacts remain at a less than significant level.

During construction, the Contractor shall conform to the project specifications. Work not covered by the project specifications would follow the uniform practices established by the Southern California Chapter of the American Public Works Association, such as the Standard Specifications for Public Works Construction (“Greenbook”). In the event that archaeological resources are encountered during excavation and grading, existing practices in the Greenbook requires the suspension of work, in whole or in part, until it is determined appropriate to resume. In addition, in the event that such resources are found during excavation and grading, mitigation would be implemented to ensure that any potential impacts remain at a less than significant level. Mitigation Measure CULT1 would be required as follows:

Mitigation Measure CULT-1: All ground-disturbing activities associated with the project that have the potential to disturb native soils (including but not limited to grubbing, tree removal, fencing, asphalt removal, utility relocations and installations, and trenching and grading activities) shall be monitored by a qualified archaeological monitor working under direct supervision of a Principal Investigator or Project Manager certified by the Register of Professional Archaeologists (qualifications derived from 36 CFR Part 61). As deemed appropriate by the archaeological monitor, a Native American monitor shall also be present during all ground-disturbing activities that have potential to disturb native soils.

In the event that archaeological resources are encountered during the course of construction activities, all work in the immediate vicinity shall be suspended until the discovery is assessed by the archaeologist and/or Native American monitor and appropriate treatment is determined. Any culturally significant materials, field notes, reports, or photographs shall be deposited in a museum, archeological repository, or with the appropriate Native American tribe.

In the event that human remains are discovered, there shall be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section
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50973.98. These code provisions require notification of the County Coroner and the Native American Heritage Commission, who in turn must notify those persons believed to be most likely descended from the deceased Native American for appropriate disposition of the remains. Excavation or disturbance may continue in other areas of the project site that are not reasonably suspected to overlie adjacent remains or archaeological resources.

With implementation of Mitigation Measure CULT1, potential impacts caused by disturbance of archeological resources during construction activities associated with the proposed project would be less than significant.

No impact on archaeological resources is anticipated from the operation of the proposed project.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Reference: Ninyo and Moore, Geotechnical Evaluation, 2015 (Appendix D); L.A. CEQA Thresholds Guide (Section D.1), Standard Specification for Public Works Construction

Comment: A significant impact may occur if grading or excavation activities associated with the proposed project would disturb unique paleontological resources or unique geologic features.

During construction, the Contractor shall confirm to the project specifications. Work not covered by the project specifications, would follow the uniform practices established by the Southern California Chapter of the American Public Works Association, such as the Standard Specifications for Public Works Construction (“Greenbook”). In the event that paleontological resources are encountered during excavation, existing practices in the Greenbook require the suspension of excavation, in whole or in part, until it is determined appropriate to resume. In addition, in the event that such resources are found during excavation, mitigation would be implemented to ensure that any potential impacts remain at a less than significant level.

Mitigation Measure CULT - 2 is being required as follows:

Mitigation Measure CULT-2: In the event that paleontological resources are encountered during construction activities, all work shall cease within the vicinity of the find until the paleontological resources are properly assessed and subsequent recommendations are determined by a qualified paleontologist.

Therefore, with implementation of Mitigation Measure CULT-2, potential impacts resulting from disturbance of paleontological resources would be less than significant. Therefore, no impact to paleontological resources is anticipated as a result of the construction and operation of the proposed project.

d) Disturb any human remains, including those interred outside of formal cemeteries?


Comment: A significant impact may occur if grading or excavation activities associated with the proposed project would disturb interred human remains.
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While there is the potential for prehistoric Native American resources, as voiced by some of the Native American contacts, the disturbed surface precludes the necessity for a full-time Native American monitor. A Native American monitor may be retained to monitor the Project if prehistoric/Native American sites are encountered during earth-moving construction-related activities.

No known burial sites are located within the project site. In the event that any human remains or related sources are discovered during construction, per standard public works construction practice, Mitigation Measure CULT-3 would be implemented to ensure that any potential impacts remain less than significant.

Mitigation Measure CULT-3 is required as follows:

Mitigation Measure CULT-3: In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found during construction activities, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are or believed to be Native American, s/he shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with Section 5097.98 of the California Public Resources Code, the NAHC must immediately notify those persons it believes to be the most likely descended from the deceased Native American. The descendants shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

Therefore, with implementation of Mitigation Measure CULT-3, impacts to the discovery of human remains would be less than significant. In addition, no impact is anticipated from the operation of the proposed project.

6. GEOLOGY AND SOILS – Would the project:

a) Expose people or structures to 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?

   Reference: City of Los Angeles General Plan Safety Element; Ninyo and Moore, Geotechnical Evaluation Report - Aliso Creek – Limekiln Creek Restoration Project, 2015 (refer to Appendix D of this IS/MND); California Department of Conservation Publication 42; L.A. CEQA Thresholds Guide (Section E.1)

   Comment: A significant impact may occur if the proposed project were located within a state-designated Alquist-Priolo Zone or other designated fault zone and appropriate building practices were not followed.

   The project site is not located within a State of California Earthquake Fault Zone/Alquist-Priolo Special Study Zone. However the site is located in a seismically active area, as is most of
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southern California. The nearest active fault is Santa Susana which is located approximately 4.7 mile of the project site (Appendix D, Table 4). However, no active faults are known to cross the project site.

Therefore, construction and operation of proposed project would not expose people or structures to potential adverse effects from the rupture of a known earthquake fault; and the impact is not anticipated to be significant.

ii) Strong seismic ground shaking?

Reference: Ninyo and Moore, Geotechnical Evaluation Report, 2015 (Appendix D); California Department of Conservation Publication 42; L.A. CEQA Thresholds Guide (Section E.1)

Comment: A significant impact may occur if the proposed project design did not comply with building code requirements intended to protect people from hazards associated with strong seismic ground shaking.

As with most locations in southern California, the project site is susceptible to ground shaking emanating from causative faults during an earthquake. As indicated in 6(a)(i) above, the project site is not located within an Alquist-Priolo Special Study Zone, and thus the potential for hazards associated with strong seismic ground-shaking such as ground surface rupture affecting the site is considered low. The closest active fault is Santa Susana which is located approximately 4.7 mile of the project site. The proposed project would be designed and constructed in accordance with the latest version of the City of Los Angeles Building code and other applicable federal, state, and local codes relative to seismic criteria. Therefore, the impact from strong seismic ground shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Reference: Ninyo and Moore, Geotechnical Evaluation, 2015; California Department of Conservation Publication 42; Los Angeles, California; L.A. CEQA Thresholds Guide (Section E.1), General Plan Safety Element

Comment: A significant impact may occur if the proposed project would be located in an area identified as having a high risk of liquefaction and appropriate design measures required within such designated areas were not incorporated into the project.

Liquefaction typically occurs when near-surface (usually upper 50 feet) saturated, clean, fine-grained loose sands are subject to intense ground shaking. The project site is located in a liquefaction hazard zone and Ninyo and Moore’s site-specific evaluation indicates that silt and sand layers, between depths of approximately 33 and 40 feet and approximately 42 and 46 feet, are susceptible to liquefaction during the design seismic event. The historic high groundwater level in the area is reported to be approximately 10 feet below the ground surface. Based on the results of the geotechnical investigations, the potential for liquefaction and liquefaction-related seismic hazards are considered low.

Sequence 1 includes removal of existing site features including a small area of asphalt pavement, a fence, and a small portion of concrete in Aliso Creek Channel, clearing and grubbing, and minor digging for pipes and bioretention basins. Bioretention basins will be only five feet deep, and no infiltration would occur in the basins. At the end of this sequence, the site’s soil will be left in a stabilized, rough graded finish. Sequence 1 would not result in the construction of new structures that would be vulnerable to liquefaction. As such, the construction and operation of Sequence 1 would not have an impact related to liquefaction.
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Sequence 2 would involve construction and operation of BMPs that are at or below ground surface. Construction and operation of any below or above ground elements would be in accordance with building and seismic codes requirements. Compliance with applicable portions of existing codes pertaining to seismic building design and standards, such as the most recent edition of the California Building Code, the Los Angeles Municipal Code, and Bureau of Engineering’s Standard Project Specifications would reduce potential adverse effects associated with liquefaction. As such, the construction and operation of the proposed project would not expose people to substantial impacts involving seismic-related ground failure from liquefaction; therefore, a less than significant impact is anticipated.

iv) Landslides?

Reference: City of Los Angeles General Plan (Landslide Inventory and Hillside Areas in the City of Los Angeles Map); Ninyo and Moore, Geotechnical Evaluation, 2015; California Department of Conservation Publication 42; L.A. CEQA Thresholds Guide (Section E.1);
Comment: A significant impact may occur if the proposed project would be located in an area identified as having a high risk of landslides and appropriate design measures required within such designated areas were not incorporated into the project.

The project is located in an area that is relatively flat, is not identified as a potential hazard area by the California Department of Mines and Geology, and is not considered susceptible to seismically-induced landslides. Therefore, construction and operation of proposed project would not expose people or structures to potential adverse effects from landslides and no impact is anticipated.

b) Result in substantial soil erosion or the loss of topsoil?

Reference: L.A. CEQA Thresholds Guide (Section E.2)
Comment: A significant impact may occur if the proposed project were to expose large areas to the erosion effects of wind or water for a prolonged period of time.

Construction of the proposed project would include ground-disturbing activities, such as excavation, trenching, grading, and landscaping. These activities could result in the potential for erosion to occur at the proposed project site, though soil exposure would be temporary and short-term in nature. In accordance with standard specifications for public works construction and building code requirements, the proposed project would require implementation of a Storm Water Pollution Prevention Plan (SWPPP) for erosion and sedimentation control. BMPs would also be undertaken to control runoff and erosion from any earthmoving activities that would occur. Implementation of such control measures would prevent substantial soil erosion or the loss of topsoil from exposed soils. After construction is completed (Sequence 1 and Sequence 2), the project site would be covered by paving or landscaping in Sequence 3 and no large areas of exposed soil that would be exposed to erosion effects of wind or water would remain. As such, construction or operation of proposed project would have less than significant impacts related to erosion and 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?

Reference: Ninyo and Moore, Geotechnical Evaluation, 2015; (refer to Appendix D of this IS/MND);
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L.A. CEQA Thresholds Guide (Section C1); Los Angeles General Plan
Comment: A significant impact may occur if the proposed project was built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.

The subsurface evaluation was conducted on October 12 through 16, 2015, Ninyo & Moore and included the drilling, logging, and sampling of ten small-diameter borings to depths ranging from approximately 10 to 51.5 feet. The Geotechnical Evaluation prepared for the project (Appendix D) indicates the site has variable subsurface conditions. Shallow fill soils overlying alluvium were encountered. In general, the near surface soils were predominantly clay in the upper 30 feet with occasional, minor amounts of sandy silt. Ninyo and Moore’s site-specific evaluation indicates that silt and sand layers between depths of approximately 33 and 40 feet and approximately 42 and 46 feet are susceptible to liquefaction during the design seismic event. The geotechnical investigation concluded that placement of aggregate base material or crushed rock should be suitable for support if wet or unstable soil conditions are encountered at the excavation bottoms for the pump station, pretreatment device, and pipelines.

With implementation and compliance with recommendations in the geotechnical evaluations and all applicable building and safety requirements (such as the building standards contained in the most recent edition of the California Building Code and LAMC and the Occupational Safety and Health Administration [OSHA] regulations governing excavations), As noted in 6b(iii) the construction and operation of the proposed project (Sequence 1, Sequence 2) would have a less than significant impact related to occurrence on a geologic unit or soil that is anticipated to be unstable, or having the potential to result in an on- or off-site landslide, lateral spreading, subsidence or collapse.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Comment: A significant impact may occur if the proposed project would be built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a risk to life and property.

The Expansion Index (EI) presented below in Table 4 is used to measure a basic index property of soil and therefore, the EI is comparable to other indices such as the liquid limit, plastic limit, and plasticity index of soils. The classification of a potentially expansive soil is based on the following table:

<table>
<thead>
<tr>
<th>Expansion Index</th>
<th>Expansion Potential</th>
</tr>
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<tbody>
<tr>
<td>0–20</td>
<td>Very Low</td>
</tr>
<tr>
<td>21–50</td>
<td>Low</td>
</tr>
<tr>
<td>51–90</td>
<td>Medium</td>
</tr>
<tr>
<td>91–130</td>
<td>High</td>
</tr>
<tr>
<td>&gt;130</td>
<td>Very High</td>
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</tbody>
</table>

The geotechnical evaluation tested one soil sample from the project site and found it to have an
expansion index of 36, which is classified as having low expansion potential. Further, the
geotechnical investigation recommends that the upper 3 feet of soil beneath the foundations be
comprised of low-expansion potential material that is in accordance with the California Building
Code. The excavation and site preparation stages of the construction phase would conform to
recommendations in the geotechnical evaluation.

Soils at the project site have a low potential to be expansive and no impact from unstable soil
conditions associated with construction and operation of the proposed project is anticipated.

e) Have soils incapable of adequately supporting the use of septic tanks or
alternative wastewater disposal systems where sewers are not available for
the disposal of wastewater?

Reference: None applicable

Comment: A significant impact may occur if the proposed project were built on soils that were
incapable of adequately supporting the use of septic tanks or alternative wastewater disposal
system, and such a system were proposed.

Construction and operation of the proposed project would not involve the use of septic tanks or
alternative wastewater disposal systems. Therefore, no impact associated with construction and
operation is anticipated.

7. GREENHOUSE GAS EMISSIONS – Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly,
that may have a significant impact on the environment?

Significance Threshold, October 2008; Aliso Creek – Limekiln Creek Restoration Project

Comment: A significant impact may occur if the proposed project would generate greenhouse gas (GHG)
emissions that would have a significant impact on the environment.

Certain gases in the earth’s atmosphere, classified as greenhouse gases (GHG),
play a critical role in determining the earth’s surface temperature. A portion of the
solar radiation that enters 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 Earth. Without the naturally
occurring greenhouse effect, Earth would not be able to support life as we know it.

GHGs are present in the atmosphere naturally, are released by natural and
anthropogenic sources, and are formed from secondary reactions taking place in
the atmosphere. Natural sources of GHGs include the respiration of humans,
animals and plants, decomposition of organic matter, and evaporation from the
oceans. Anthropogenic sources include the combustion of fossil fuels, waste
treatment, and agricultural processes.
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Carbon dioxide (CO\textsubscript{2}), methane (CH\textsubscript{4}), and nitrous oxide (N\textsubscript{2}O) are the GHGs that are widely accepted as the principal contributors to human-induced global climate change and would be generated by the proposed project. The majority of CO\textsubscript{2} emissions are byproducts of fossil fuel combustion. CH\textsubscript{4} is the main component of natural gas and is associated with agricultural practices and landfills. N\textsubscript{2}O is a colorless GHG that results from industrial processes, vehicle emissions, and agricultural practices.

Global warming potential (GWP) is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to CO\textsubscript{2}. The GWP of a GHG is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time (i.e., lifetime) that the gas remains in the atmosphere (“atmospheric lifetime”). The GWP of each gas is measured relative to CO\textsubscript{2}, the most abundant GHG. GHGs with lower emissions rates than CO\textsubscript{2} may still contribute to climate change because they are more effective at absorbing outgoing infrared radiation than CO\textsubscript{2} (i.e., high GWP). The concept of CO\textsubscript{2}-equivalents (CO\textsubscript{2e}) is used to account for the different GWP potentials of GHGs to absorb infrared radiation.

Total construction-related GHG emissions were estimated using the same methodology to estimate criteria pollutant emissions discussed earlier. As shown in Table 5, total project construction emissions would be 865 and 739 metric tons (MT) of CO\textsubscript{2e} for 2017 and 2018. SCAQMD recommends that construction emissions be amortized over 30 years, which is assumed to be the average lifetime of a project’s operations, and added to the operational emissions of the project. When this total is amortized over the 30-year life of the project, annual construction emissions would be approximately 53.5 MT CO\textsubscript{2e} per year.

For other projects, the SCAQMD has only adopted a significance threshold of 10,000 MT of CO\textsubscript{2} per year for industrial projects (SCAQMD 2008). The GHG CEQA Significance Threshold Stakeholder Working Group recommended options for evaluating nonindustrial projects including thresholds for residential, commercial, and mixed use projects (SCAQMD 2009). The draft thresholds released by the SCAQMD include a threshold of 3,000 MT CO\textsubscript{2e} per year for all of those lands use types. At the time of this analysis, these draft thresholds have not been adopted by the SCAQMD. Since the proposed project would include a stormwater BMP project and recreational land uses, the proposed SCAQMD threshold of 3,000 MT CO\textsubscript{2e} per year will be used as a guideline for comparison for this analysis. Table 5 summarizes the proposed operational emissions and amortized construction GHG emissions. As shown in Table 5, the project-related GHG emissions are below the two SCAQMD proposed thresholds of 3000 MT (all land use types) and 10,000 MT (used for industrial projects) CO\textsubscript{2e} per year. Additionally, it should be noted that the construction of the biofiltration basins in the open areas; using vegetation, will sequester the greenhouse gases in the atmosphere, and thus further reduce GHG emissions below the annual calculated value in Table 5. Therefore, the GHG emissions would be negligible and anticipated to result in less than significant impacts.
## Issues

### Table 5

Construction-Related GHG Emissions (MT CO\textsubscript{2}e/year)

<table>
<thead>
<tr>
<th>Year</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017</td>
<td>865</td>
</tr>
<tr>
<td>2018</td>
<td>739</td>
</tr>
<tr>
<td>Total</td>
<td>1,604</td>
</tr>
</tbody>
</table>

Amortized Construction Emissions 53.5

MT CO\textsubscript{2}e = metric tons of carbon dioxide equivalent

Additional details available in Appendix A of this ISMND

Source: Modeled by CalEEMOD.2013.2.2.

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?


Comment: A significant impact may occur if the proposed project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG.

Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, requires that statewide GHG emissions be reduced to 1990 levels by 2020. ARB’s Scoping Plan is the state’s plan to achieve the GHG reductions in California required by AB 32 and also reiterates the state’s role in the long-term goal established in Executive Order S-3-05, which is to reduce GHG emissions to 80% below 1990 levels by 2050.

ARB is required to update the Scoping Plan at least once every five years to evaluate progress and develop future inventories that may guide this process. ARB approved the first update to the Climate Change Scoping Plan: Building on the Framework in 2014 (ARB 2014). The Scoping Plan update confirms that the state is on track to meet the 2020 emissions reduction target, but will need to maintain and build upon its existing programs, scale up deployment of clean technologies, and provide more low-carbon options to accelerate GHG emission reductions, especially after 2020, in order to meet the 2050 target. The Scoping Plan update did not directly create any regulatory requirements for construction of the proposed project. However, the Scoping Plan update includes recommended actions (e.g., Phase 2 heavy-duty truck GHG standard standards, enhance and strengthen the Low Carbon Fuel Standard) that would indirectly address GHG emissions from construction activities.

In May 2007, the City of Los Angeles released its Climate Action Plan (CAP), “Green LA: An Action Plan to Lead the Nation in Fighting Global Warming.” The
Plan sets forth a goal of reducing the City’s greenhouse gas emissions to 35% below 1990 levels by the year 2030. The CAP is a voluntary plan that identifies over 50 action items, grouped into focus areas, to reduce emissions. Climate LA is the implementation program that provides detailed information, including a context, lead departments, and a timeline for completion, for each action item discussed in the GreenLA CAP. Where possible, the ClimateLA program document includes potential CO2 emission reductions from full implementation of the measures.

The proposed project would replace an undeveloped open space (with no vegetation) with an expanded public park, and would include installation of BMPs and bioretention basins that decrease pollutants load in urban runoff and stormwater while providing water quality benefits to the Los Angeles River. Additionally, this project, by filtration of stormwater through bioretention basins, restoring vegetation, will improve climate change adaptability, increase sustainability, replenish natural resources; which are are supportive of the City’s Green LA and Climate LA initiatives. As discussed earlier, the proposed project would also not generate GHG emissions that would have a significant impact on the environment. Therefore, the proposed project would not conflict with any applicable plan, policy, or regulation for the purpose of reducing GHG emissions. The impact would be less than significant.

8. 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?

Reference:   DTSC EnviroStor Data Management System (http://www.envirostor.dtsc.ca.gov/public); Geotechnical Evaluation (2015), Ninyo and Moore; L.A. CEQA Thresholds Guide (Sections F.1 & F.2); SWRCB LUST and UST listings on Geotracker (http://geotracker.swrcb.ca.gov)?

Comment: A significant impact may occur if the proposed project utilizes substantial amounts of hazardous materials as part of its routine operations and could potentially pose a hazard to the public under accident or upset conditions.

Based on review of Geo Tracker and EnviroStor no known hazardous materials releases were identified within the project area or immediate vicinity. The GeoTracker system identified a Permitted Underground Storage Tank (UST) within Area 2 of the project site. The address of the UST has been mapped by error; as its address is 8840 Vanalden Ave. which is located south of the Union Pacific Railroad Tracks and thus outside of the project site. In addition, it should be noted that no work will take place in Area 2; therefore, the Permitted UST will not impact the project or create a hazard. The EnviroStor database identified three Leaking UFTs (LUFT) cleanup sites and one tiered permit site within a 0.25-mile radius of the project site. The status of the LUFT cases includes two closed cases and one open-site assessment case. All of the open and closed LUFT cases are outside the project site where no improvements are proposed. Therefor the identified LUFT and clean-up sites are not anticipated to have an impact on the proposed project.

Review of the EnviroStor also identified a dry cleaning facility (Mirage Cleaners) located on border of 0.25 miles outside of the project site, which is under voluntary cleanup. Mirage Cleaners has a land use restriction; which none of them applies to the proposed project. The soil vapor extraction (SVE) system was installed and appeared to have been effective at reducing tetrachloroethylene (PCE) contamination in the soil. Elevated concentration of PCE in groundwater is not anticipated. Additionally, the groundwater level was encountered at a depth of approximately 42 feet; whereas subsurface waters diverted from bioretention basins are...
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approximately at a depth of 5 feet or less. Subsequently, it is not anticipated that the groundwater will mix with the diverted subsurface water from the basins.

A Geotechnical Report was conducted in November 2015 by Ninyo and Moore. Eighteen near surface soil samples were analyzed for presence of total petroleum hydrocarbons (TPHs); additional testing was performed on five soil samples for VOCs, Title 22 metals, OCPs, PCBs, chlorinated herbicides, and PAHs (Appendix D). All samples were clean and no contamination was observed in all samples with the exception of two samples with small amount of TPH and arsenic but still below the threshold by 10000 fold.

A low concentration of TPH and arsenic was detected in two samples and one sample, respectively. However, given the low level and by 10000 fold below the threshold, the soil would not be considered a petroleum-contaminated or arsenic-contaminated waste. Based on the laboratory results, none of the soil samples would be classified as hazardous waste. The environmental evaluation recommended additional subsurface exploration and environmental testing to be performed to further evaluate the lateral and vertical extent of potential chemical of concern including TPH and Arsenic at the site. Therefore mitigation measure HAZ-1 is proposed below:

The lack of noticeably petroleum-impacted soils indicates that the suspected petroliferous soils would likely be of limited extent. However, given the random nature of the distribution of existing fill at the project site, asphaltic base petroleum residues may be encountered. Should contaminated soils be encountered during construction activities, the soils would be excavated, treated or disposed of to the satisfaction of the applicable regulatory agencies, which could include the Los Angeles Fire Department, LARWQCB, and/or California Department of Toxic Substances Control (DTSC), thereby eliminating any future risk of upset or accidental conditions. Likewise, if contaminated groundwater is encountered, it would be handled in compliance with applicable federal, state, and local regulations and would not pose a future risk of upset or accidental conditions.

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?
Reference: DTSC EnviroStor Data Management System (http://www.envirostor.dtsc.ca.gov/public); L.A. CEQA Thresholds Guide (Sections F1 and F.2); SWRCB LUST and UST listings on Geotracker (http://geotracker.swrcb.ca.gov)
Comment: Refer to 8(a) above.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
Reference: L.A. CEQA Thresholds Guide (Section F.2)
Comment: A significant impact may occur if the proposed project were located within one-quarter mile of an existing or proposed school site and were projected to release toxic emissions which pose a hazard beyond regulatory thresholds.

There are no existing or proposed schools within 0.25-mile from the project site: The closest schools, the Calahan Elementary School (18722 W Knapp Street) and Napa Elementary School (19010 W Napa Street) are respectively 0.8 miles east and 1.4 miles south of the project site. All
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Schools in the area are outside of the project site and, therefore, construction and operation of the proposed project would not have an impact on schools.

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?

Reference: DTSC EnviroStor Data Management System (http://www.envirostor.dtsc.ca.gov/public); L.A. CEQA Thresholds Guide (Section F.2); SWRCB’s GeoTracker, and USEPA EnviroMapper

Comment: A significant impact may occur if the proposed project were 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.

The project site is not listed in the State Water Resources Control Board GeoTracker system, which includes leaking underground fuel tank (LUFT) sites and Spills, Leaks, Investigations, and Cleanups sites; or the Department of Toxic Substances Control EnviroStor Data Management System, which includes CORTESE sites.

An electronic database search of listing maintained by federal, state, and local agencies of sites with known or suspected hazardous material contamination (Envirostar, Geotracker), storage tanks, and discharge or spillage incidents was performed during preparation of this IS/MND. No sites with known hazardous materials releases were identified within the project area or immediate vicinity. No work will take place in Area 2; therefore, the permitted UST will not impact the project or create a hazard. The EnviroStor database identified one voluntary cleanup site, three LUFTs cleanup sites, and one tiered permit site within a 0.25-mile radius of the project site. The status of the LUFT cases includes two closed cases and one open-site assessment case. All open and closed LUFT, permitted, and voluntary clean-up sites are outside the project site where no improvements are proposed. The open LUFT case is the closest cleanup site and is located south of Area 4 near the Union Pacific Railroad tracks. Therefore, the identified LUFT and clean-up sites are not anticipated to have an impact on the proposed project.

There is no evidence that known releases or contamination associated with the site or surrounding properties will be encountered during the construction of the project; however, compliance with applicable laws and regulations governing excavation, treatment, and disposal of contaminated soils and groundwater, would keep hazards to the public or the environment below a level of significance.

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 for people residing or working in the project area?


Comment: A significant impact may occur if the proposed project site were located within a public airport land use plan area, or within two miles of a public airport, and would create a safety hazard.

The project site is not located within an airport land use plan, or within two miles of a public airport of public use airport. The nearest facility is Van Nuys Airport, located approximately 6 miles from the project site. Therefore, no impacts would occur as a result of construction and operation of the project.
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f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?


Comment: A significant impact may occur if the proposed project is in the vicinity of a private airstrip and would result in a safety hazard for people residing or working in the project area.

The project site is not located within the vicinity of a private airstrip. The nearest facility is Van Nuys Airport, located approximately 6 miles, and Whiteman Airport, located approximately 11 miles from the project site, both used for private planes. Therefore, no safety hazard from proximity to a private airport or airstrip is anticipated from the construction and operation of project (Sequence 1, Sequence 2, and Sequence 3).

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Reference: L.A. CEQA Thresholds Guide (Section F.1); City of Los Angeles General Plan

Comment: A significant impact may occur if the proposed project were to substantially interfere with roadway operations used in conjunction with an emergency response plan or evacuation plan or would generate sufficient traffic to create traffic congestion that would interfere with the execution of these plans.

The project site is not located in close proximity to any critical emergency, dependent care or “lifeline” (i.e., major gas, electric, water and wastewater) facilities as denoted on General Plan Exhibit H of the Safety Element. The proposed project does not include any characteristics (e.g. permanent road closures) that would physically impair or otherwise interfere with emergency response or evacuation in the project vicinity.

During construction activities, vehicles and equipment would access the site via the entrance off Vanalden Avenue. Therefore, no road or lane closures are anticipated to be necessary during the construction process. During construction, ingress and egress to the site and surrounding properties, particularly for emergency response vehicles, would be maintained at all times. In addition, maintenance activities would occur two or three times a year, and involve very limited vehicle numbers, anticipated to be no more than 3 to 5 at a given time. Subsequently, maintenance activities would not alter the adjacent street system. Therefore, construction and operation of the proposed project would not impair or interfere with implementation of an adopted emergency response plan or emergency evacuation plan and the impact is less than significant.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Reference: Northridge Community Plan; Planning Department Parcel Profile Report; NavigateLA

Comment: A significant impact may occur if the proposed project were located in a wildland area and poses a significant fire hazard, which could affect persons or structures in the area in the event of a fire.

The project site is not located within a very high Fire Hazard Severity Zone. Therefore, the
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proposed project would not have any significant impacts to fire safety in the area.

9. HYDROLOGY AND WATER QUALITY – Would the project:

a) Violate any water quality standards or waste discharge requirements? □ □ ☒ □

Reference: L.A. CEQA Thresholds Guide (Section G.2)

Comment: A significant impact would occur if the proposed project discharged water which did not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems such as the LARWQCB. These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

Aliso Creek is located within a 12,484-acre watershed that drains three significant tributaries; Aliso Creek, Limekiln Creek, and a 102-inch concrete storm drain line. In addition, Aliso Creek is a tributary to Los Angeles River and reducing pollutant loads will ultimately improve water quality in Los Angeles River. Urban runoff draining from this tributary area contains numerous pollutants with potential to degrade water quality, including trash, copper, zinc, and coliform bacteria. The pollutants of primary concern, bacteria and metals, are the targeted pollutants for the project site. Aliso Creek and the Los Angeles River were designated as impaired and included on California’s 2010 CWA 303(d) list of impaired waters due to excessive amounts of coliform bacteria and metals, such as copper and zinc. Under the proposed project, urban runoff will be diverted from Aliso and Limekiln Creeks as well as 102-inch storm drain into pretreatment devices. The partially treated water will be pumped to biofiltration basins for further treatment. A portion of the treated water will provide subsurface irrigation and the excess will be discharged to Aliso Creek.

Since project operations would remove pollutants from the runoff prior to discharge to the Aliso and Limekiln Creeks (untreated runoff from the 102-inch storm drain and the two creeks is currently discharged to the Aliso Creek and ultimately to Los Angeles River), operation of the proposed project would result in a net improvement to water quality, which would help the City avoid or minimize the potential for future violations of water quality. This is considered to be a beneficial impact.

Soil exposure during excavation, grading, and other construction activities for the proposed project could result in possible erosion and runoff into storm drains if proper controls are not implemented. Thus, the proposed project has the potential to violate water quality standards during construction if proper controls are not implemented. Any on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code (LAMC), which addresses grading, excavations, and fills. Further, construction under all phases would be required to comply with applicable requirements pertaining to stormwater and urban runoff. This includes compliance with City Ordinance 172,176 which pertains to control and regulation of discharges to the storm drain system and receiving water; Ordinance 172,673 which requires implementation of stormwater pollution control measures for construction activities; and Ordinance 173,494 which provides stormwater pollution control for planning and construction of development and redevelopment projects and requires the establishment of measures to control the site runoff. These measures would be detailed in a SWPPP and compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations. With the implementation of construction measures to minimize and control soil erosion and site runoff, significant impacts to water quality from site
runoff during construction impacts would be less than significant.

Comment: A significant impact may occur if the proposed project discharged water which did not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems such as the LARWQCB. These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Reference: L.A. CEQA Thresholds Guide (Sections G.2 and G.3)

Comment: A project would normally have a significant impact on groundwater supplies if it were to result in a demonstrable and sustained reduction of groundwater recharge capacity or change the potable water levels sufficiently that it would reduce the ability of a water utility to use the groundwater basin for public water supplies or storage of imported water, reduce the yields of adjacent wells or well fields, or adversely change the rate or direction of groundwater flow.

As noted in Geological Evaluation (Appendix D) groundwater under the project site has been encountered approximately at a depth of 42 feet. Additionally, the subsurface exploration indicates that the upper 30 feet of soil at the site consists of clayey soils with low infiltration. Accordingly, due to the low infiltration rates of the site, soils in the upper 30 feet, on-site infiltration should not be considered in the project design. Consequently, alternative BMPs such as biofiltration basins are considered. Some of the partially treated water from the BMPs will be used for subsurface irrigation, which in turn eliminates the demand on groundwater supplies. The proposed project would not use groundwater resources or alter groundwater recharge potential. The project area is not used for groundwater recharge or as groundwater supplies. Therefore, changes to groundwater supplies would not occur and no impacts are anticipated.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Reference: L.A. CEQA Thresholds Guide (Sections G.1 and G2)

Comment: A significant impact may occur if the proposed project resulted in a substantial alteration of drainage patterns that resulted in a substantial increase in erosion or siltation during construction or operation of the project.

The proposed project would not alter the course of the Aliso and Limekiln Creeks. Rather, the proposed project would enhance the storm drain connection to the Aliso Creek and ultimately Los Angeles River through the installation of natural treatment systems including storm drain diversions and a pretreatment device. This is considered beneficial and would not result in a substantial increase in erosion or siltation.
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Additionally, construction of the proposed project would result in demolition and ground surface disruption activities, such as site grading and excavation that would leave the site as stabilized pervious surface. However, soil exposure would be temporary and short-term in nature and applicable Department of Building and Safety erosion control techniques would limit potential erosion. Therefore construction and operation of the proposed project would not result in substantial erosion or siltation off-site. Impacts would be less than significant.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?

Reference: L.A. CEQA Thresholds Guide (Section G.1)

Comment: A significant impact may occur if the proposed project resulted in increased runoff volumes during construction or operation of the proposed project that would result in flooding conditions affecting the project site or nearby properties.

As discussed in Section 9 (a), the proposed project would alter drainage patterns by diverting dry-weather and a portion of wet-weather stormwater flows in the vicinity of project site to be conveyed onto the project site. Pretreatment devices may be used at stormwater inlet points to capture and remove trash, suspended solids, and other floatables. This would result in an improved drainage configuration of the surrounding area into the Aliso and Limekiln Creeks. This change to the site drainage pattern would not affect the area's overall drainage pattern, nor would it result in flooding on- or off-site. Therefore, impacts associated with flooding would be less than significant.

e) 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?

Reference: L.A. CEQA Thresholds Guide (Section G.2)

Comment: A significant impact may occur if the volume of runoff were to increase to a level, which exceeded the capacity of the storm drain system serving a project site. A significant impact may also occur if the proposed project would substantially increase the probability that polluted runoff would reach the storm drain system.

The proposed project would divert all dry weather and a portion of wet-weather stormwater flows from adjacent storm drain and creeks to the project site and construct and operate appropriate, beneficial, and feasible water quality improvements and BMPs. Therefore, the proposed project would take existing flows and not increase the volume of runoff to a level that would exceed the capacity of the storm drain system serving a project site. In addition, the proposed project would treat the stormwater using BMPs (i.e., storm drain diversion, pretreatment device, bioretention basins, etc.) to reduce pollutants entering the Aliso and Limekiln Creeks, which would further decrease the probability that polluted runoff would reach the storm drain system. Therefore, no impact is anticipated from the construction and operation of the proposed project.

f) Otherwise substantially degrade water quality?

Reference: Refer to 9(a) above.

Comment: Refer to 9(a) above
Issues

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<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant With Mitigation</th>
<th>Less Than Significant</th>
<th>No Impact</th>
</tr>
</thead>
</table>


g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
Reference: FIRM FEMA Panel No 06037 0019C; L.A. CEQA Thresholds Guide (Sections G.1 to G.3)
Comment: A significant impact may occur if the proposed project were to place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

According to Flood Insurance Rate Map (FIRM) 06037 0019C, although portion of the project site is located within a 100-year flood hazard area, but the proposed project does not include the construction of housing. As such, no impact is anticipated.

h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?
Reference: FIRM FEMA Panel No. 06037 0019C; L.A. CEQA Thresholds Guide (Sections G.1 & G.3)
Comment: A significant impact may occur if the proposed project were to place within a 100-year flood hazard area structures that would impede or redirect flood flows.

According to FIRM 06037 0019C, portion of the project site is located within a 100-year flood hazard area. The channels are not typically filled to capacity. Additionally, the proposed project does not include the construction of structures that would impede the flood flows. Consequently, in case of a 100-year storm event, the flood flows will not be impeded, because the diversion structures will be bypassed. Therefore, less than significant impacts would occur.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
Reference: City of Los Angeles General Plan Safety Element, L.A. CEQA Thresholds Guide (Sections E.1 & G.3)
Comment: A significant impact may occur if the proposed project were to place within a 100-year flood hazard area structures that would impede or redirect flood flows.

As noted in 9(g) above, a portion of the project site is located within a 100-year flood hazard area. Sequence 1 includes demolition of site features, clear and grub, and excavation at the site except for the parameter fencing. At the end of Sequence 1 the site would be left stabilized, rough-graded and secured (fenced) until construction of Sequence 2. Sequence 1 would not result in the construction or operation of new structures that would be vulnerable to flooding. As such, the construction and operation of Sequence 1 would have no impact related to exposing people or structures to flooding.

Sequence 2 would involve the construction and operation of BMPs that are at or below ground surface. No new buildings would be constructed on the site that would impede or redirect flood flows. Sequence 2 would have no impact related to exposing people or structures to flooding.
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Sequence 3 would include the recreational, aesthetic, and educational amenities that would further transform the project site to supplement the BMPs and associated water quality benefits. Construction and operation of passive and active park elements, would consist of mostly small structures or features with a small footprint with minimal aboveground components located throughout the site. These features would not impede or redirect flood flows in the project area. Sequence 3 is expected to have a less than significant impact related to exposing people of structures to flooding.

Comment: A significant impact may occur if the proposed project were located in an area where a dam or levee could fail, exposing people or structures to significant risk of loss, injury or death.

As indicated in 9(g),

j) Inundation by seiche, tsunami, or mudflow? □ □ ✗ □

Reference: City of Los Angeles General Plan Safety Element, LA CEQA Thresholds Guide (Section E.1)

Comment: A significant impact may occur if the proposed project would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

Seiches are large waves generated in enclosed bodies of water in response to ground shaking. Although the project site is Sequence 2 of the project, water quality improvement elements include naturalized bioretention basin(s), and/or subsurface irrigation systems are proposed. These structures could hold water in a storm event. However, these features would be constructed at or below the ground surface and would not result in seiches. Thus, there is no potential for seiches impacting the project site; therefore, there is no impact associated with the construction and operation of the proposed project.

Tsunamis are tidal waves generated in large bodies of water caused by fault displacement or major ground movement. Hazardous tsunamis, which are rare along the Los Angeles coastline, have the potential to cause flooding in the low-lying coastal area. The project site is inland and not impacted by tsunamis.

The area east of the project site is designated as potential inundation areas, as identified in the General Plan Safety Element Exhibit G. Most of the Sequence 2 components within this area would be located underground with the exception of the electrical panels, and therefore would not be affected by inundation.

The project site is not located in an area considered susceptible to seismically-induced landslides. As discussed in Geology and Soils 6(a) (iv), construction and operation of proposed project would not expose people or structures to potential adverse effects from landslides and the impact is anticipated to be less than significant. Compliance with design and/or construction recommendations in the geotechnical studies prepared for the project as a standard practice would keep potential impacts within acceptable levels. Further, most of the Sequence 2 project elements would be located underground and thus would not be susceptible to damage associated with mudslides or cause mudslides at other locations.

Potential impacts associated with seiches, tsunamis and mudslides for construction and operation of Sequence 3 would be similar to that of Sequence 2, and a less than significant impact is anticipated.
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10. LAND USE AND PLANNING – Would the project:
   a) Physically divide an established community?
   
   Reference: City of Los Angeles General Plan, LA CEQA Thresholds Guide (Section H.2)
   Comment: A significant impact would occur if the project includes features such as a highway, above-ground infrastructure, or an easement that would cause a permanent disruption to an established community or would otherwise create a physical barrier within an established community.

   The proposed project would occur within the Aliso and Limekiln Creeks site. Neither construction nor operation of any of the sequences would include features such as a highway, aboveground infrastructure, or an easement that would cause a permanent disruption to an established community or would otherwise create a physical barrier within an established community. Therefore, no impact is anticipated from the construction and operation if the proposed project

   b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
   Reference:  City of Los Angeles General Plan, LA CEQA Thresholds Guide (Sections H.1 & H.2); City of Los Angeles General Plan; Zone Information & Map Access System (ZIMAS);
   Comment: A significant impact may occur if the proposed project were inconsistent with the General Plan, or other applicable plan, or with the site’s zoning if designated to avoid or mitigate a significant potential environmental impact.

   The project site is zoned Open Space (OS)-1XL as well as designated as Open Space in the General Plan. It is located within the Northridge Community Plan. Under the Planning and Zoning Code, construction, installation, operation and maintenance of infrastructure for public utility is permitted in all zones. Allowed uses within areas designated as Open Space include uses for public health and safety and right-of-way for utilities. Further, the Northridge Community Plan states that one of several functions of Open Space is to provide right-of-way for utilities, recreational and educational opportunities. Therefore, the project site would not conflict with the zoning or land use designation.

   Land uses within the project site consist of open space and transportation right-of-way. The proposed project consists of improvements to the stormwater infrastructure system to improve water quality. Additionally, this project will also provide multiple benefits to the neighborhood by providing improved park facilities, educational opportunities, wildlife habitats, and by restoring vegetation. Most of the Sequence1 project elements would be located below grade and would not involve changes in land use. Uses of Vanalden Park, including passive lawn area and playground equipment, would temporarily be disrupted during construction activities; however, similar amenities exist along the Dearborn Park and full use of the park would be restored once construction is completed. Sequence 1 would not conflict with, or require changes to, existing land uses.

   As discussed above, Sequence 2 is consistent with the zoning, general designation and the community plan. Therefore, no General Plan amendment or zone change would be required,
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and no impact is anticipated.

Sequence 2 would also involve restoring the integrity of natural resources on much of the site through construction of bioretention basins and native landscaping that would be consistent with the zoning, general designation and the community plan. As such, no impact is anticipated.

c) Conflict with any applicable habitat conservation plan or natural community
conservation plan?
Reference: City of Los Angeles General Plan, LA CEQA Thresholds Guide (Sections H.1 & H.2); Los Angeles County Draft General Plan, Figure 9.3 Significant Ecological Areas
Comment: A significant impact may occur if the proposed project were located within an area governed by a habitat conservation plan or natural community conservation plan and would conflict with such plan.

As previously discussed in 4(d), the project site is not located in a Significant Ecological Area, Habitat Conservation Plan, or a Natural Community Conservation Plan. As such, construction and operation of Project would not conflict with the provisions of an approved conservation plan and no impact is anticipated.

11. 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?
Reference: City of Los Angeles General Plan, L.A. CEQA Thresholds Guide (Section E4) California Geological Survey Aggregate Sustainability in California, 2012; California Department of Conservation Division of Oil, Gas, & Geothermal Resources Well Finder
Comment: A significant impact may occur if the proposed project is located in an area used or available for extraction of a regionally important mineral resource, if the project converts a regionally important mineral extraction use to another use, or if the project affects access to such use.

No mineral resources are identified within the project area. Therefore, construction and operation of the proposed project is not anticipated to result in the loss of availability of a valuable known mineral resource and no impact is anticipated.

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?
Reference: Refer to 11(a) above.
Comment: Refer to 11(a) above.

12. NOISE – Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards
established in the local general plan or noise ordinance, or applicable
standards of other agencies?
Reference: City of Los Angeles Municipal Code (LAMC, Chapter IV, Article 1, Section 41.40; Section 112.05 of Chapter IX, Article 2);
Comment: A significant impact may occur if the proposed project were to expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
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The City regulates construction noise via the LAMC (Chapter IV, Article 1, Section 41.40; Section 112.05 of Chapter IX, Article 2). A significant impact may occur if the proposed project generates construction noise outside of the hours prescribed in the LAMC, or increases noise levels during project operation in excess of 5 dBA (A-weighted decibel) over ambient CNEL (Community Noise Equivalent Level).

Under the noise provisions, construction equipment noise levels are limited to 75 dBA, if technically feasible. The City allows construction during the week between the hours of 7:00 a.m. and 9:00 p.m., and specifically prohibits night construction if related noise can disturb persons occupying sleeping quarters in any dwelling, hotel, or residence. In addition, construction within 500 feet of a residence is restricted to the hours of 8:00 a.m. to 6:00 p.m. on Saturdays and National Holidays, and prohibited on Sundays. The City of Los Angeles noise ordinance indicates that no construction (other than individual homeowner engaged in the repair or construction of his/her dwelling) shall be performed before 8:00 a.m. or after 6:00 p.m. on any Saturday or on a federal holiday or at any time on Sunday, within 500 feet of sensitive land uses including but not limited to parks, residences, schools. The City’s standard construction specifications as applicable require construction equipment to have noise suppressing devices, and requires noise controls such as placement of noise barriers, use of low-noise generating equipment, maintenance of mufflers and ancillary noise abatement equipment, scheduling high noise producing activities during periods that are least sensitive, routing construction-related truck traffic away from noise-sensitive areas, and reducing construction vehicle speeds. Despite the required noise controls, construction equipment noise levels can exceed the 75 dBA goal established in the LAMC. All phases of the project construction including sequences 1 and 2 would occur during the day, Monday through Friday between the hours of 7:00 a.m. and 9:00 p.m. (most likely, daily construction would not occur after 6:00 p.m.) and between the hours of 8:00 a.m. and 5:00 p.m. on Saturdays. No construction would occur during prohibited hours.

The project site is bounded by the mobile home park to the west, the Wilkinson Multipurpose Senior Center (WMSC), residential housing to the north; and east; and Union Pacific Railroad (UPR) tracks to the south. Ambient noise levels were monitored in the Vanalden Park at the nearest to the WMSC, a parking lot, residential housing (northern portion) on June 10, 2016. The monitoring location is 555 feet from mobile home park on the west, 58 feet away from Wilkinson Senior Center, and 630 feet from UPR tracks. The ambient noise level (Leq) varied between 46 and 70 with the average close to 51 dBA.

The noise levels at the Wilkinson Multipurpose Senior Center were low in spite of ongoing group recreational activities, such as singing and dancing, and because the area is not exposed to direct traffic noise on Nordhoff which is the continuing source of noise in the project area. The higher ambient noise level was due to a direct exposure to trains passing by on the UPR tracks on the southern portion of the project site.

Once construction is complete, operation of Sequence 2, the water quality BMPs are not expected to generate audible noise. To minimize noise from pump operations while providing security, both pumps and motors would be installed below grade within a secure wet well and would not generate substantial noise. Operations and maintenance would result in periodic inspections of the facilities (twice annually) and use of a vacuum truck to clean the pretreatment device as needed based on inspections. These activities are minor and would not result in substantial increases in CNEL noise level. These activities are anticipated to occur during daytime hours in compliance with the City’s Noise Ordinance. Therefore, a less than significant
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noise impact is anticipated during operation of the proposed project.

Once the Sequence 2 stormwater BMPs are constructed, their operation are not expected to result in substantive CNEL noise level increases because the Sequence 3 operations would be less intensive than the Sequence 1 and Sequence 2. There, a less than significant noise impact is anticipated during project operation.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Reference: City of Los Angeles General Plan, City of Los Angeles Municipal Code, L.A. CEQA Thresholds Guide (Section I)

Comment: A significant impact may occur if the project were to expose persons to or generate excessive groundborne vibration or groundborne noise levels.

Construction activities associated with the project could generate minor groundborne vibration from use of heavy equipment. Typically, only heavy construction activities, such as pile driving, would generate vibrations that could result in groundborne noise at nearby structures or in cosmetic damage to the structures. No pile driving would occur, and excessive groundborne vibration and/or groundborne noise are not anticipated. Therefore, a less than significant impact is anticipated during project (Sequence 1, Sequence 2 and Sequence 3) construction.

Project operations would not involve activities that could generate vibrations or groundborne noise, or otherwise expose persons to such impacts. Therefore, project (Sequence 1, Sequence 2 and Sequence 3) operation would not result in significant impacts related to groundborne vibration or noise.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Reference: Draft L.A. CEQA Thresholds Guide (I.2)

Comment: A significant impact may occur if the project were to substantially and permanently increase the ambient noise levels in the project vicinity above levels existing without the proposed project.

As discussed in 12(a) above, operation of the proposed project (Sequence 1, Sequence 2, and Sequence 3) would not result in substantial increases in ambient noise levels because the project would operate passively and only maintenance and inspections would occur, which are minor activities that do not generate substantial permanent increase in noise levels above existing ambient levels. No impact would occur.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Reference: City of Los Angeles Municipal Code

Comment: A significant impact may occur if the proposed project were to create a substantial temporary or periodic increase in the ambient noise levels in the project vicinity above levels existing without the project.

Construction Noise

Construction activity is anticipated to begin in October 2017 and take approximately 24 months
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to complete, concluding in October 2019. LAMC allows construction activity to occur Monday through Friday between the hours of 7:00 a.m. and 9:00 p.m., although daily construction would not likely occur after 6:00 p.m. Construction would occur between the hours of 8:00 a.m. and 6:00 p.m. on Saturdays, and no construction activities on Sundays and federal holidays. There would be no construction activities on Sundays, and no construction would occur during prohibited hours.

**Equipment:** Typical noise levels from various types of equipment that may be used during construction are listed in Table 6. The table shows noise levels at distances of 50 feet from the construction noise source. Construction activities typically require the use of numerous pieces of noise-generating equipment. The noise levels shown in Table 7 take into account that multiple pieces of construction equipment would be operating simultaneously. When considered as an entire process with multiple pieces of equipment, project-related activity (i.e., ground clearing and site preparation) would generate noise levels between 84 and 89 dBA Leq at 50 feet.

<table>
<thead>
<tr>
<th>Construction Equipment</th>
<th>Noise Level at 50 feet (dBA, Leq)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Backhoe (Skid Loader/Skip Loader)</td>
<td>73-95</td>
</tr>
<tr>
<td>Compressor</td>
<td>75-87</td>
</tr>
<tr>
<td>Concrete Mixer Truck</td>
<td>75-88</td>
</tr>
<tr>
<td>Concrete Pump Truck</td>
<td>81-85</td>
</tr>
<tr>
<td>Compressor</td>
<td>75-87</td>
</tr>
<tr>
<td>Dump Truck</td>
<td>82-95</td>
</tr>
<tr>
<td>Jackhammer</td>
<td>81-98</td>
</tr>
<tr>
<td>Saws</td>
<td>72-82</td>
</tr>
<tr>
<td>Vibrator</td>
<td>68-82</td>
</tr>
</tbody>
</table>

Source: City of Los Angeles CEQA Thresholds Guide 2006

<table>
<thead>
<tr>
<th>Construction Method</th>
<th>Noise Level at 50 feet (dBA, Leq)</th>
<th>Noise Level at 50 feet with mufflers (dBA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ground Clearing</td>
<td>84</td>
<td>82</td>
</tr>
<tr>
<td>Site Preparation</td>
<td>89</td>
<td>86</td>
</tr>
<tr>
<td>Foundations</td>
<td>78</td>
<td>77</td>
</tr>
<tr>
<td>Structural</td>
<td>85</td>
<td>83</td>
</tr>
<tr>
<td>Finishing</td>
<td>89</td>
<td>86</td>
</tr>
</tbody>
</table>

The impact analysis is based on the construction limits in the LAMC. Construction activity would comply with the allowable hours of construction in the LAMC, including 7:00 a.m. to 9:00 p.m. Monday through Friday, 8:00 a.m. to 6:00 p.m. on Saturday, and no construction activity on Sundays or federal holidays. If construction follows an accelerated schedule and work to be performed outside the noise ordinance, a variance from the police department is obtained, and best management practices is implemented as required by the variance. The LAMC limits equipment noise levels to 75 dBA at 50 feet unless technically infeasible. Noise levels from individual pieces of equipment would typically range from 72.5 to 94.3 dBA Leq at 50 feet. Unmitigated noise levels would typically exceed the allowable noise level stated in the LAMC. Therefore, without mitigation, the proposed project would result in a significant impact related to construction noise.

Mitigation Measures Noise-1 through Noise-7 are required as follows:

Mitigation Measure NOISE-1: Construction equipment shall be properly maintained and equipped with mufflers and other suitable noise attenuation devices.

Mitigation Measure NOISE-2: Equipment shall be turned off when not in use for an excess of five minutes, except for equipment that required idling to maintain performance.

Mitigation Measure NOISE-3: The City shall locate stockpiling and vehicle staging areas away from noise-sensitive receivers.

Mitigation Measure NOISE-4: The City shall establish a public liaison for project construction that is responsible for addressing public concerns about construction activities including noise issues. As needed, the liaison shall determine the cause of the concern (e.g., starting too early, bad muffler) and implement measures to address the concern.

Mitigation Measure NOISE-5: Construction contractor, inspectors, and supervisors shall be informed of project-specific noise requirements.

Mitigation Measure NOISE-6: Prior to construction work, the public shall be notified of the location and dates of construction.

Mitigation Measure NOISE-7: Los Angeles Department of Public Works shall coordinate with the site administrator for sensitive land uses, including the Wilkinson Multipurpose Senior Center. Coordination between the site administrator and the City shall continue on an as-needed basis while construction is occurring adjacent to these land uses to minimize potential disruption to the land uses.

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 expose people residing or working in the project area to excessive noise levels?

Reference: NavigateLA)
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Comment: A significant impact may occur if the proposed project would expose people residing or working in the project area to excessive noise levels due to the project site being located within an airport land use plan or within two miles of a public airport where such a plan has not been adopted.

The project site is located approximately 6.7 miles northwest of the Van Nuys Airport and 17 miles northwest of the Burbank Airport; outside of the airport’s 60 dBA noise contour (which is localized around the airport’s runway). Therefore, no impact is anticipated associated with the construction and operation of the proposed project.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Reference: NavigateLA; Google Earth, 2009

Comment: A significant impact may occur if the proposed project would expose people residing or working in the project area to excessive noise levels due to the vicinity to a private airstrip.

No private airstrips are located within the vicinity of the project area. Therefore, no impact is anticipated associated with the construction and operation of the proposed project.

13. POPULATION AND HOUSING -- Would the project:

a) Induce substantial 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)?

Reference: General Plan, including the Northridge Community Plan; L.A. CEQA Thresholds Guide (Section J.1)

Comment: A significant impact may occur if the proposed project would induce substantial population growth through new development in undeveloped areas or by introducing unplanned infrastructure that was not previously evaluated in the adopted community plan or general plan.

Sequence 1 would not promote population growth either directly or indirectly, since it consists of demolition of site features, clear and grub, and excavation on the project site. It would not provide additional capacity that would encourage the introduction of new housing to the area. Therefore, construction and operation of Sequence 1 would not induce population growth in the project area or within the City of Los Angeles, and no impacts are anticipated.

Sequence 2 is upgrades to the existing stormwater systems intended to treat on-site and off-site runoff, reduce contamination, and improve the water quality in Aliso Creek, Limekiln Creek, and Los Angeles River. It would not induce population growth directly or indirectly and no impacts are anticipated.

Sequence 3 would involve landscape, irrigation, aesthetic, and educational amenities that would further supplement BMPs on the project site. The park (area 1) would serve existing residents within the project site, areas 3 and 4 are fenced off to the public. All areas 1, 3, and 4 would not introduce population growth directly or indirectly. No impacts are anticipated.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Reference: L.A. CEQA Thresholds Guide (Sections J.1 and J.2)
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Comment: A significant impact may occur if the proposed project displaced substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

No housing would be displaced or changed as a result of the proposed project (Sequence 1, Sequence 2, and Sequence 3); therefore, no impact is anticipated.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?  
Reference: See 13(b) above.  
Comment: See 13(b) above.

14. 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 public services:

i) Fire protection?  
Reference: City of Los Angeles General Plan Safety Element, L.A. CEQA Thresholds Guide (Section K.2)  
Comment: A significant impact may occur if the project required the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

The proposed project site and surrounding area is currently served by local Fire Station No. 103 located at 28243 Parthenia Street (approximately 1.8 miles driving distance from project site). Most of proposed project elements are located underground and would not require additional fire protection or emergency response services beyond what is currently provided. As per Bureau of Engineering Standard Project Specifications, construction activities would comply with applicable Fire Code requirements.

Construction and operation of proposed project would not have a significant impact related to the need for construction of additional fire protection facilities nor would it adversely affect service ratios. In addition, construction of the proposed project would not require lane reductions for limited duration along the project areas. As part of standard specifications, all contractors are required to coordinate with the commanders of potentially affected fire stations prior to construction so that alternative route planning can occur and can be implemented if required. With this standard specification, significant impacts to the provision of fire protection services would not occur.

ii) Police protection?  
Reference: City of Los Angeles General Plan Safety Element, L.A. CEQA Thresholds Guide (Section K.1)  
Comment: A significant impact may occur if the proposed project were to result in an increase in demand for police services that would exceed the capacity of the police department responsible for serving the site.

The proposed project site and surrounding area is served by the City of Los Angeles Police Department’s Devonshire Division station (located at 1663 Butler Avenue...
### Issues

(approximately 8.7 miles driving distance from the project site). Most of proposed project elements are located underground and would not require additional police protection beyond what is currently provided. Furthermore, the proposed project would not result in substantial changes to population, housing or traffic that would increase demand on police protection services. Therefore, implementation and operation of the proposed project would not result in the need for additional police protection services nor would it adversely affect service ratios or response times. As part of standard specifications, all contractors are required to coordinate with the commanders of potentially affected police stations prior to construction so that alternative route planning can occur and can be implemented if required. With this standard specification, significant impacts to the provision of police protection services would not occur.

Operation of the project would also not require additional police protection services beyond what is currently provided and the impact is anticipated to be less than significant.

iii) Schools?

Reference: L.A. CEQA Thresholds Guide (Section K.3)
Comment: A significant impact may occur if the proposed project included substantial employment or population growth that could generate demand for school facilities that exceeded the capacity of the school district responsible for serving the project site.

Two elementary schools are located approximately 0.25-mile from the project site: Calahan Elementary School at 18722 W Knapp Street and Napa Elementary School at 19010 W Napa Street.

The proposed project is not growth-inducing, either directly or indirectly, and therefore, would not increase the demand for schools in the area. All schools in the area are separated from the site and, therefore, construction and operation of the proposed project would not result in any physical impacts to schools. The construction and operation of the proposed project would not have an impact on schools.

iv) Parks?

Reference: L.A. CEQA Thresholds Guide (Section K.4)
Comment: A significant impact may occur if the recreation and park services available could not accommodate the population increase resulting from the implementation of the proposed project and new or physically altered facilities were needed.

Dearborn Park is located 2.5 miles of the project site. The construction of the proposed project would not induce growth, either directly or indirectly, and, therefore, would not increase the demand for parks in the area. In addition, the proposed project would increase the amount of park and recreation uses in the project area. Therefore, no impacts to parks would occur.

v) Other public facilities?

Reference: None applicable
Comment: A significant impact would occur if the project results in the need for new or
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altered public facilities, such as libraries, due to population or housing growth.

Construction and operation of the proposed project would not induce growth, either directly or indirectly, and, therefore, would not increase the demand or use for libraries or other public facilities in the area. No impact is anticipated.

15. 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?

Reference: L.A. CEQA Thresholds Guide (Section K.4)

Comment: A significant impact may occur if the proposed project included substantial employment or population growth that generated demand for public park facilities that exceed the capacity of existing parks or that substantially affected the level or service of existing park facilities.

As discussed previously, the proposed project would create passive parkland and open space and thus would satisfy some of the demand for recreation facilities and offset the levels of use on other recreational facilities in the area. In addition, two neighborhood parks, Dearborn Park and Randall D Simmons Park are located within 2.5 to 3.9 miles of the project site. The proposed project would not induce growth, either directly or indirectly, and, therefore, would not increase the demand for parks or other recreational facilities in the area. Less than significant impacts would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

Reference: L.A. CEQA Thresholds Guide (Section K.4)

Comment: A significant impact may occur if the proposed project would require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

The proposed project consists of water quality improvements including construction of three biofiltration basins and native landscaping on an open non-vegetated area. The proposed project would restore the integrity of natural resources on much of the site, and would provide passive parkland and open space in Area1 and landscape buffer in Area’s 3 and 4, as they are fenced off for public access, subsequently not increasing the recreational services available for the local community. It would not result in construction of a new facility, or expansion of the existing facility that could have an adverse physical effect on the environment. As such, less than significant impacts would occur.

16. TRANSPORTATION/Traffic – Would the project:

a) Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Reference: L.A. CEQA Thresholds Guide (Section L)
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Comment: A project would have a significant traffic impact if the traffic volume to roadway capacity ratio is increased, as follows:

Vanalden Avenue is assigned as a collector street and has a capacity of 10,000 vehicles per day. During the construction of the project, the number of truckloads of material deliveries per day is estimated to be 48 truckloads. Based on review of Department of Transportation, the 24 hours traffic count is 1255 (daily traffic count of 82 per hour between the hours of 7 am and 3 pm) for Vanalden Avenue. Adding 48 truckloads to 1255 daily traffic count both ways of Vanalden, will result in a traffic capacity considerably lower that the allowable threshold of 10,000 vehicles per day. Thus, it is clear that the construction of the proposed project will not exceed the existing circulation system, and less than significant impact would occur.

Similarly, given that the operations of the proposed project will result in fewer trucks and less frequent trips (twice or three time per year), and thus would not increase in trip generation and there would be less than significant impact in facility capacity.

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Reference: L.A. CEQA Thresholds Guide (Section L)
Comment: A significant impact may occur if the proposed project would conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

The Congestion Management Program (CMP) was created statewide because of Proposition 111 and has been implemented locally by the Los Angeles County Metropolitan Transportation Authority (LACMTA). The CMP for Los Angeles County requires the analysis of traffic impacts of individual development projects with potentially regional significance. A specific system of arterial roadways and freeways comprises the CMP system. In conformance with CMP Transportation Impact Analysis Guidelines, a traffic impact analysis is conducted and proven that: the proposed project is an ecological enhancement project built in the open space available and has no regional significance. Additionally, the proposed project has no impact on the guidelines stated in the Northridge community Plan.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?

Reference: L.A. CEQA Thresholds Guide (Section L)
Comment: A significant impact may occur if the proposed project results in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks.

The proposed project would include site remediation and construction of passive parkland and open space. Neither construction nor operation of the proposed project would affect air traffic patterns. Therefore, no impact to air traffic patterns would occur.

d) Substantially increase hazards due to a design feature (e.g., sharp curves

Reference: L.A. CEQA Thresholds Guide (Section L)
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or dangerous intersections) or incompatible uses (e.g., farm equipment)?
Reference: L.A. CEQA Thresholds Guide (Section L.5)
Comment: A significant impact may occur if the proposed project substantially increased road hazards due to a design feature or incompatible uses.

As previously discussed, construction and operational use of the parkland and open space would not result in significant traffic impacts. The proposed project would be accessed by Vanalden Avenue located off of Nordhoff Street. The access intersection on Nordhoff Street would not create a hazard to traffic or pedestrians. In addition, the project would be also accessed by Ledan street by removing and replacing the existing wood barrier and chain link fence. Existing vegetation would also be replaced in kind. No impacts would occur.

e) Result in inadequate emergency access?
Reference: L.A. CEQA Thresholds Guide (Section L.5 and L.8)
Comment: A significant impact may occur if the proposed project resulted in inadequate emergency access.

As part of standard specifications, all contractors are required to coordinate with the commanders of potentially affected fire and police stations prior to construction so that alternative route planning can occur and can be implemented if required. In addition, access to emergency vehicles would be maintained at all times during construction. Construction and operation of the proposed project would utilize the current access areas at the project site. Therefore the proposed project would not affect emergency access or result in inadequate emergency access. No impact would occur.

f) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?
Reference: L.A. CEQA Thresholds Guide (Section L)
Comment: A significant impact may occur if the proposed project were to conflict with adopted policies, plans, or programs supporting alternative transportation.

The proposed project would not conflict with adopted policies, plans, or programs supporting alternative transportation. Three bus lines serve the project area, Lines 166, 364, Northridge Dash. There is an existing Metro) bus stop located at 8775 Wilbur Avenue. This bus stop is not expected to require relocation. None of these lines have stops along Vanalden Avenue or N. Wilber Avenue. Construction of the proposed project would not require rerouting or lines or relocations of bus stops. In addition, there are no bike lanes in the area that would be affected by project construction or operation. Therefore, no impact to alternative transportation modes or supporting programs would occur from construction of the proposed project.

g) Result in inadequate parking capacity?
Reference: L.A. CEQA Thresholds Guide (Section L)
Comment: A significant impact may occur if the proposed project were to result in inadequate parking capacity.

No permanent impacts to parking are anticipated in Vanalden Park’s main parking during construction. However, this impact will be temporary and construction would be staged, as
Issues

feasible, to minimize impacts. The staging for the diversion structure, diversion pipeline, pretreatment devices, and new force main, overflow structure, and biofiltration basins would occur within the contractor work zone established in the open areas in Vanalden Park. The laydown area for the equipment is at the easterly portion of the parking lot, just north of the new pump station (west of the existing Aliso Creek diversion structure). Workers will park along Vanalden Avenue. Access to Area 3 will be either from the Nordhoff Street along the top of the channel or through an existing access easement located on the east. Area 3 will be accessed by the bridge over Limekiln Creek within the project limits or through Ledan Street.

Operation of proposed project would involve minimal maintenance activities that would not be anticipated to impact parking capacity along Vanalden Avenue.; therefore, a less than significant impact is anticipated.

17. UTILITIES AND SERVICE SYSTEMS – Would the project:

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Reference: L.A. CEQA Thresholds Guide (Sections M.1 and M.2)
Comment: A significant impact may occur if the proposed project resulted in the need for new construction or expansion of water or wastewater treatment facilities that could result in an adverse environmental effect that could not be mitigated.

Other than temporary use of municipal water during construction and establishment of re-vegetated areas, The project would not have a water demand and, therefore, would not require new water facilities. Refer to 17(a) above regarding wastewater facilities. A less than significant impact to water and wastewater facilities is anticipated associated with the project.
Issues

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Reference: L.A. CEQA Thresholds Guide (Section M.2)
Comment: A significant impact may occur if the volume of stormwater runoff from the proposed project increases to a level exceeding the capacity of the storm drain system serving the project site.

The proposed project would modify existing local storm drains and divert flow to the project site. The storm drain diversions under the proposed project represent an improvement to the storm drain system that would result in reduced flows to the Los Angeles River. These improvements would not result in the need for new or expanded storm drain facilities elsewhere in the system that could result in significant impacts. Therefore, the construction and operation of the proposed project would result in less than significant impacts to the storm drain system.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Reference: L.A. CEQA Thresholds Guide (Section M.1)
Comment: A significant impact may occur if the proposed project’s water demands would exceed the existing water supplies that serve the site.

The City of Los Angeles Department of Water and Power (LADWP) provide potable water to the project area and vicinity. As described in 17(b) above, other than temporary use of municipal water during construction and establishment of re-vegetated areas, project would not include new water uses and LADWP would be able to meet the water demand for construction of the project without the need for new or expanded facilities or resources. No new water entitlements or resources would be required and therefore, impacts of project construction and operation would be less than significant.

e) Result in a determination by the wastewater treatment provider that 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?

Reference: L.A. CEQA Thresholds Guide (Section M.2)

Comment: A significant impact may occur if the proposed project results in a determination by the wastewater treatment provider that 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.

Refer to Sections 17(a) and 17(b) above.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?

Reference: L.A. CEQA Thresholds Guide (Section M.3); County of Los Angeles Department of Public Works, 2007 Annual Report on the Countywide Siting Summary Plan and Countywide Siting Element, June 2008

Comment: The management of solid waste in the City involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. A significant impact would occur if the proposed project results in solid waste generation of five tons or more per week.
Within the City of Los Angeles, the BOS, as well as a number of private companies collect and dispose of solid waste. There are three types of disposal facilities within Los Angeles County; (1) Class III Landfills (Municipal Solid Waste Landfills), (2) Unclassified (Inert) Landfills, and (3) Transformation (waste to energy) Facilities. Of the County landfills, the facilities that currently accept waste from the City of Los Angeles are Calabasas (accepts only waste from west valley communities within the City of Los Angeles), Chiquita Canyon, and Sunshine Canyon Landfill (the City and County each utilize separate portions of the landfill). Bradley Landfill, which also collected waste from the City of Los Angeles, closed in April 2007.

The remaining permitted Class III (municipal solid waste) landfill capacity in Los Angeles County was estimated at 91.43 million tons as of December 31, 2007. Without additional capacity, the Los Angeles County disposal needs for Class III landfills will exceed the existing permitted Class III landfill capacity in the County beginning in 2014. However, the County is evaluating various capacity options for meeting the daily disposal demand, including expanding existing landfill capacity, exporting to out-of-county facilities, increasing waste stream diversion, and use of alternative technologies such as waste conversion technology. Construction and operation of the proposed project would comply with the requirements of the California Integrated Waste Management Act of 1989 (Assembly Bill 939 – “AB 939”), which requires the implementation of aggressive solid waste management programs that focus on diverting waste from being disposed of in landfills (such as source reduction, recycling, and composting). The City has a 76.4 percent diversion rate, surpassing the State’s requirement for a 50 percent waste diversion rate after 2013, and has set a goal of achieving a 90 percent diversion rate by 2025.

The construction and demolition debris would be recycled whenever possible, or disposed of at an appropriate facility. As demonstrated above and according to the CalRecycle’s SWIS database, there is sufficient inert waste disposal capacity available in Los Angeles County to adequately accommodate the anticipated demolition debris. Further, certain landfills accept wastes considered to be beneficial-use materials, such as soil, green waste, and asphalt. Soils are used as part of regular landfill operations and also are used to cap closed landfills. Several landfills in the greater Los Angeles area accept excavated soil, including those that otherwise are restricted by ordinances from accepting municipal solid waste generated in the City of Los Angeles.

Construction and operation of the proposed project would comply with the requirement of the California Integrated Waste Management Act of 1989 (Assembly Bill 939 – “AB 939”), which requires the implementation of aggressive solid waste management programs that focus on diverting waste from being disposed of in landfills (such as source reduction, recycling, and composting). As of March 2013, the City had a diversion rate of 76.4 percent, surpassing the State’s requirement for a 50 percent waste diversion rate after 2000, and has set a goal of achieving a 90 percent diversion by 2025. Therefore, impacts associated with construction debris would result in a less than significant impact on landfill capacity. Operation of the proposed project, sediments, trash and debris collected in the pretreatment device would be removed approximately two times a year. This would be a nominal volume and existing landfills have sufficient capacity to accommodate it. Additionally, operation of the proposed project would include passive parkland and open space facilities. Operational solid waste would be minimal and is anticipated to have a less than significant impact on landfill capacity.

g) Comply with federal, state, and local statutes and regulations related to solid waste?
Issues

Reference: L.A. CEQA Thresholds Guide (Section M.3)
Comment: A significant impact may occur if the proposed project would generate solid waste that was in excess of or was not disposed of in accordance with applicable regulations.

As discussed above in 17(f), the proposed project would generate less than significant quantities of solid waste per day. The City of Los Angeles Solid Waste Management Policy Plan (SWMPP) is the long-range solid waste management policy plan for the City. The objective of the SWMPP is to reduce at the source or recycle a minimum of 50 percent of the City's waste and calls for the disposal of the remaining waste in local and possibly remote landfills. The SWMPP establishes citywide diversion objectives, including diversion of 75 percent by 2013. While the SWMPP is the long-range solid waste management policy plan for the City, the Source Reduction and Recycling Element (SRRE) is the strategic action policy plan for diverting solid waste from landfills. The source reduction, recycling, composting, special waste, and public education goals are defined by specific programmatic elements including tasks, roles, responsibilities, and an implementation schedule. The SRRE provides solid waste diversion objectives in accordance with the requirement of AB 939. It is updated annually and is based on an ongoing evaluation of programs and waste analysis. Guidance for, and implementation of, the solid waste diversion programs identified in the SRRE are administered by the City of Los Angeles Department of Public Works, Bureau of Sanitation, Solid Resources Citywide Recycling Division. The City's Bureau of Sanitation presently operates other solid waste reduction and recycling programs, such as its Curbside Recycling Program, which was designed to promote source reduction to achieve the goals, established by AB 939 and associated City programs (e.g., the SRRE). The proposed project shall be required to comply with all applicable regulations related to solid waste, and therefore, impacts are anticipated to be less than significant.

Solid waste disposal during construction and operation of the proposed project would comply with federal, state, local statutes and regulations related to solid waste. As such, impacts would be less than significant.

18. MANDATORY FINDINGS OF SIGNIFICANCE
   a) Does the project have the potential to 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, 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?

   Reference: Preceding analyses
   Comment: No plant or animal species listed on any state of federal lists for endangered, threatened or special status species were identified on-site. There are no known cultural resources located on-site. Construction of the three basins and diversion structure in Limekiln Creek would not eliminate important examples of the major periods of California history or prehistory. However, the area is culturally-sensitive, and there are known cultural resources within the vicinity. Mitigation Measures CULT-1 through CULT-3 are provided to address the potential discovery of a previously unknown archeological or paleontological resources, which reduces potentially significant impacts to less than significant.

   b) Does the project have impacts that are individually limited, but cumulatively
Issues

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)?

Reference: Preceding analyses

Comment: The following links have been tracked for purposes of understanding potential cumulative projects planned upstream of the Aliso Creek-Limekiln Creek Project:

1. LA County, LA River Master Plan: http://ladpw.org/wmd/watershed/LA/projects/
2. City of Los Angeles River Revitalization: http://www.lariver.org/

The approved January 2016 Enhanced Watershed Management Program (EWAMP) for the Upper Los Angeles River was reviewed and appeared not to highlight specific projects upstream of the project site. Therefore, the future cumulative effects based on EWAMP review are unknown.

Operation of the proposed project includes pumping and filtering the water into the basin. With the engineering soil media proposed, there will be minimal ponding since we are promoting the filtration with the objective to avoid a vector concern. Water will pumped systematically to the three areas (a, c, and d) to avoid over saturating the soils, as well as promoting vegetation growth within the basins. As mentioned before, the water may also be used to irrigate the banks of the basins to further filter the water and reduce the demand on potable water for irrigation.

The anticipated irrigation demand is approximately:

<table>
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<th>Area</th>
<th>Slope Area (sf)</th>
<th>Water Demand (gal) for One Water Cycle per Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area 1</td>
<td>41,425</td>
<td>28,998</td>
</tr>
<tr>
<td>Area 3</td>
<td>26,183</td>
<td>18,328</td>
</tr>
<tr>
<td>Area 4</td>
<td>26,630</td>
<td>18,641</td>
</tr>
</tbody>
</table>

The plant material will be drought tolerant and the water schedule will be limited. Once plants are established, it is intended to only water the area once a week. The use of water for irrigation is relatively minimal compared to the overall flow diverted from the channels and will provide added vegetation to the area to promote habitat for birds, insects and other wildlife species.

It is anticipated that cumulative effects are minimal in regards to the removal of flow within the channel and will have negligible effect on downstream habitat since the project conveys flow to the Los Angeles River in a concrete lined channel from the project site to the Los Angeles River.

Construction and operation of proposed project would be passive and would not result in significant impacts that could, in conjunction with the related projects, result in significant cumulative impacts to the environment. To the contrary, operation of the proposed project, in conjunction with the proposition O
projects, would result in improved water quality in the Aliso Creek, tributary to Los Angeles River by reducing the amount of untreated runoff and stormwater that enters the Los Angeles River from the watershed.

Based on the above, significant cumulative impacts from related-projects are not anticipated. In addition, the proposed project is not expected to make a cumulatively considerable contribution to a significant cumulative impact. Therefore no impact is anticipated.

c) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?

Reference: Preceding analyses
Comment: The purpose of proposed project is to improve both the short-term and long-term water quality of the receiving waters. Therefore, the overall project is anticipated to have positive short-term and long-term benefits on water quality. No impact is anticipated.

d) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Reference: Preceding analyses
Comment: With implementation of the mitigation measures listed in Section V below, the construction and operation of proposed project are not anticipated to have significant impacts that would cause substantial adverse effects on human beings, either directly or indirectly. Therefore, all potentially significant environmental effects associated with the proposed project can be mitigated to less than significant levels.
V. MITIGATION MEASURES

The following mitigation measures form the foundation of a mitigation monitoring and reporting program (MMRP) for the proposed project. CEQA requires public agencies to adopt a reporting or monitoring program for the changes to the project that have been adopted to mitigate or avoid significant effects on the environment (Public Resources Code Section 21081.6). The program must be adopted by the public agency at the time findings are made regarding the project. The State CEQA Guidelines allow public agencies to choose whether its program will monitor mitigation, report on mitigation, or both (14 CCR Section 15097(c)).

The mitigation measures described herein are supplemental to those required as standard procedure for the City and its contractors. The City and its contractors are the parties responsible for: (1) the necessary implementing actions; (2) verifying that the necessary implementing actions are taken; and (3) the primary record documenting the necessary implementing actions.

The mechanisms for verifying that mitigation measures have been implemented include design drawings, project plans and specifications, construction documents intended for use by construction contractors and construction managers, field inspections, field reports, and other periodic or special reports. All records pertaining to this mitigation program will be maintained and made available for inspection by the public in accordance with the City’s records management systems.

Cultural Resources:

**Mitigation Measure CULT-1:** All ground-disturbing activities associated with the project that have the potential to disturb native soils (including but not limited to grubbing, tree removal, fencing, asphalt removal, utility relocations and installations, and trenching and grading activities) shall be monitored by a qualified archaeological monitor working under direct supervision of a Principal Investigator or Project Manager certified by the Register of Professional Archaeologists (qualifications derived from 36 CFR Part 61). As deemed appropriate by the archaeological monitor, a Native American monitor shall also be present during all ground-disturbing activities that have potential to disturb native soils.

In the event that archaeological resources are encountered during the course of construction activities, all work in the immediate vicinity shall be suspended until the discovery is assessed by the archaeologist and/or Native American monitor and appropriate treatment is determined. Any culturally significant materials, field notes, reports, or photographs shall be deposited in a museum, archeological repository, or with the appropriate Native American tribe.

In the event that human remains are discovered, there shall be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 50973.98. These code provisions require notification of the County Coroner and the Native American Heritage Commission, who in turn must notify...
those persons believed to be most likely descended from the deceased Native American for appropriate disposition of the remains. Excavation or disturbance may continue in other areas of the project site that are not reasonably suspected to overlie adjacent remains or archaeological resources.

Mitigation Measure CULT-2: In the event that paleontological resources are encountered during construction activities, all work shall cease within the vicinity of the find until the paleontological resources are properly assessed and subsequent recommendations are determined by a qualified paleontologist.

Mitigation Measure CULT-3: In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found during construction activities, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are or believed to be Native American, s/he shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with Section 5097.98 of the California Public Resources Code, the NAHC must immediately notify those persons it believes to be the most likely descended from the deceased Native American. The descendants shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

Noise:

Mitigation Measure NOI-1: Construction equipment shall be properly maintained and equipped with mufflers and other suitable noise attenuation devices.

Mitigation Measure NOI-2: Equipment shall be turned off when not in use for an excess of five minutes, except for equipment that required idling to maintain performance.

Mitigation Measure NOI-3: The City shall locate stockpiling and vehicle staging areas away from noise-sensitive receivers.

Mitigation Measure NOI-4: The City shall establish a public liaison for project construction that is responsible for addressing public concerns about construction activities. As needed, the liaison shall determine the cause of the concern (e.g., starting too early, bad muffler) and implement measures to address the concern.

Mitigation Measure NOI-5: Construction supervisors shall be informed of project-specific noise requirements.

Mitigation Measure NOI-6: Prior to construction work, the public shall be notified of the location and dates of construction.

Mitigation Measure NOI-7: Los Angeles Department of Public Works shall coordinate with the site administrator for institutional land uses, including the Wilkinson Multipurpose Senior Center. Coordination between the site administrator and the City shall continue on
the as-needed basis while construction is occurring adjacent to these land uses to minimize potential disruption to the land uses.

VI. DETERMINATION – RECOMMENDED ENVIRONMENTAL DOCUMENTATION

A. Summary

The project site is divided into the following four subareas:

- **Area 1** – A portion of Vanalden Park, owned and maintained by the City of Los Angeles Department of Recreation and Parks (Recreation and Parks), which currently is an open space, will be developed with biofiltration basins, subsurface irrigation and an improved decomposed granite pathway. Existing park land will not be altered.

- **Area 2** – Wilbur Debris Basin, owned and maintained by the Los Angeles County Flood Control District (LACFCD), will not be altered and is outside the project limits.

- **Area 3** – An open space, owned by the City of Los Angeles, will be improved with biofiltration basins and subsurface irrigation.

- **Area 4** – An open space, owned by the LACFCD, will be improved with biofiltration basins and subsurface irrigation.

The project will include the design and construction of stormwater BMPs to treat urban runoff and stormwater to reduce pollutants in flow from Aliso and Limekiln Creeks, which ultimately ends up in the Los Angeles River. Proposed BMPs include channel diversions, pump stations, pretreatment devices, subsurface piping, vegetated biofiltration basins and electrical and instrumentation equipment.

Urban runoff and stormwater from Aliso Creek, Limekiln Creek channels, and an existing 102-inch storm drain pipe will be diverted to pretreatment devices and pump stations located west of the Wilbur Debris Basin and southeast part of area 3. The partially treated water will then be conveyed to three biofiltration basins (Area 3, 4, and 1) located on the southeast, south, and west portions of the project area. As previously stated due to the pump limitations and the large drainage area relative to the available implementation space, the BMP footprints do not have sufficient capacity to divert and treat the 85th percentile, 24-hour storm event. For this reason, the BMP footprints will be designed to be built as large as possible to maximize the water quality impacts while meeting the allocated construction budget. As a result, the treated water and overflow is eventually redirected back to the creeks that ultimately drain to Los Angeles River.

The BMPs would be designed to mimic natural hydrologic processes and minimize the amount of pollutants in the stormwater before it is discharged into the Los Angeles River.

The biofiltration basins will be made up of natural materials including native plants and engineered soil media. The basins will capture and detain stormwater to allow it to be filtered through the soil media to remove particles and pollutants (see Figure 4 for examples). For this project, the proposed basins would have an approximate excavation...
depth of up to 5 feet and a ponding depth of one to two feet to detain and filter diverted dry and wet-weather runoff. Once the flow is filtered it is discharged back to the creek. The basins would be designed to preserve the natural look of the park. Educational signs would be included to inform users of the BMP multiple benefits.
VI. PREPARATION AND CONSULTATION

A. Preparer
Shokoufe Marashi, Environmental Supervisor
Bureau of Engineering, Environmental
1149 South Broadway, 6th Floor
Los Angeles, CA 90015

B. Coordination and Consultation
Andy Flores, Project Manager
Prop O Clean Water Division
LA Bureau of Engineering
1149 S. Broadway, Los Angeles CA, 90015

Michael VanWagoner, Project Engineer
Prop O Clean Water Division
Bureau of Engineering
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Barry Berggren, Division Manager
Wastewater Collection Systems Division
Bureau of Sanitation
2714 MEDIA CENTER DR, 90065

Shahram Kharaghani, Program Manager
Watershed Protection Division
Bureau of Sanitation
1149 South Broadway, 10th Floor
Los Angeles, CA  90015

Kevin Kim
Watershed Protection
LA County Department of Public Works
900 Freemont Ave. Alhambra CA, 91803
(626) 458 - 4356

Mark Leung, Landscape Architect Associate III
Department of Recreation and Parks.
221 N Figueroa St, Los Angeles, CA 90012

Cathie Santo Domingo, Superintendent
VII. DETERMINATION - RECOMMENDED ENVIRONMENTAL DOCUMENTATION

A. Summary

The proposed project would intercept and divert dry-weather flow from Aliso and Limekiln Creeks and portion of the wet-weather stormwater flow from the Limekiln Creek. Diverted dry-weather runoff and diverted wet-weather flows would be conveyed to a pretreatment device and bioretention basins for pretreatment prior to subsequent discharge into Aliso Creek after the storm event.

Implementation of this project would help the City to enhance the water quality. Enhance the LARWQCB to protect the designated beneficial uses of the receiving waters. The project is funded by Proposition O, a $500 million Clean Water Bond Measure approved by voters November 5, 2004.
B. Recommended Environmental Documentation

On the basis of this initial evaluation, I find that the project would not have a significant effect on the environment, and a Mitigated Negative Declaration should be adopted.

Prepared by: _________________________________
Shokoufe Marashi
Environmental Supervisor I

Approved by: _________________________________
Maria Martin, Manager
Environmental Management Group
VIII. REFERENCES:


ArchaeoPaleo Resource Management Inc. *Cultural Resources Phase 1 Assessment: City of Los Angeles, Department of Public Works, Bureau of Engineering Aliso Creek – Limekiln Creek Restoration Project in the Community of Northridge, San Fernando Valley, Los Angeles County, California*. November 2015.


California Emission Estimator Model (CalEEMod.2013.2.2.)


City of Los Angeles, City of Los Angeles Municipal Code.


List of Appendices

Appendix A: Air Quality Worksheets

Appendix B: Biological Assessments

Appendix C: Cultural Resources Assessments

Appendix D: Geotechnical Evaluations

Appendices are enclosed in CD attached to the document.
IX. RESPONSE TO COMMENTS

A. Introduction

A Draft IS/MND for the Aliso Creek Limekiln Creek Restoration Project Initial Study/Mitigated Negative Declaration (IS/MND) was distributed on October 6, 2016, for public review pursuant to the California Environmental Quality Act (CEQA) Section 21091 and State CEQA Guidelines 15105. The 30-day public review period concluded on November 4, 2016. The IS/MND was distributed to interested or involved public agencies and organizations for review. The IS/MND was also made available for general public review at the following locations: the Northridge Library, 9051 Darby Ave, Northridge, CA 91325; Wilkinson Multi-Purpose Senior Center, 8956 Vanalden Ave, Northridge, CA 91324; Council District 12- District Office, 9207 Oakdale Ave., Suite 200, Chatsworth, CA 91311; and Bureau of Engineering, Environmental Management Group, 1149 S. Broadway. In addition, an electronic version of the IS/MND was made available on the City of Los Angeles Bureau of Engineering website at: http://eng.lacity.org/techdocs/emg.

During this public review period, a total of 4 comment letters were received. A Final IS/MND was prepared including responses to comments received on the Draft IS/MND.

Each comment letter has been assigned a number code, and individual comments in each letter have been coded to facilitate responses. For example, the letter from SCRRRA is identified as Letter 1, with comments noted as 1-1, 1-2, 1-3, etc. Copies of each comment letter are provided prior to the response to each letter. Comments that raise issues not directly related to the substance of the environmental analysis in the Draft IS/MND are noted but, in accordance with CEQA, did not receive a detailed response.

B. Responses to Written Comments That Address Environmental Issues in the Draft Initial Study/Mitigated Negative Declaration

The written comment letters and emails received on the Draft IS/MND are listed in Table 9 below. The comments and associated responses are arranged by the date of receipt of the comment letter or email. The individual comments in the letters have been numbered and are referred to in the responses that directly follow the comment letter.
### Table 9: List of Written Comment Letters

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<thead>
<tr>
<th>Letter No.</th>
<th>Agency/Organization/Individual</th>
<th>Date</th>
<th>Page No. of Response</th>
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<tr>
<td>1</td>
<td>Southern California Regional Rail Authority (SCRRRA)</td>
<td>October 26, 2016</td>
<td>87</td>
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<td>2</td>
<td>Metro</td>
<td>October 26, 2016</td>
<td>90</td>
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<td>3</td>
<td>Department of Transportation</td>
<td>November 7, 2016</td>
<td>93</td>
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<tr>
<td>4</td>
<td>Maria Rosa</td>
<td>November 4, 2016</td>
<td>95</td>
</tr>
</tbody>
</table>
October 28, 2016

City of Los Angeles Department of Public Works
Bureau of Engineering, EMG
Attention: Shokoufe Marashi, Environmental Supervisor
1149 S. Broadway, Suite 600, Mail Stop 939
Los Angeles, CA 90015-2213

RE: Aliso Creek–Limekiln Creek Restoration Project – City of Los Angeles – Notice of Intent to Adopt a Mitigated Negative Declaration

Dear Ms. Marashi:

The Southern California Regional Rail Authority (SCARRA) has received the Notice of Intent to adopt a Mitigated Negative Declaration for the City of Los Angeles’s Aliso Creek – Limekiln Creek Restoration Project. Thank you for the opportunity to comment on key issues relative to SCARRA and operations of the railroad adjacent to the project site. As background information, SCARRA is a five-county Joint Powers Authority (JPA) that operates the regional commuter rail system known as Metrolink. Additionally, SCARRA provides rail engineering, construction, operations and maintenance services to its five JPA member agencies. The JPA consists of the Los Angeles County Metropolitan Transportation Authority (METRO), San Bernardino Associated Governments (SANBAG), Orange County Transportation Authority (OCTA), Riverside County Transportation Commission (RCTC) and Ventura County Transportation Commission (VCTC).

The railroad right of way adjacent to the proposed project site is owned by the Union Pacific Railroad (UP) for the northern 80 ft. and by Metro for the southern 40 ft. SCARRA dispatches all trains passing this location and maintains the entire right of way. Currently, 20 Metrolink, 12 Amtrak and 5 Union Pacific trains operate daily in the vicinity of your project.

From reviewing the Notice of Intent to Adopt a Mitigated Negative Declaration on this project it is unclear as to the extent of the construction activities immediately adjacent to the railroad tracks and Northridge Metrolink Station hence our preliminary comments are as follows:

1. Metrolink Northridge Station and parking lot is located within close proximity to your project. Project must not disrupt access to or from the station with placement of excavated material from the site.
2. Metrolink currently has a single track railroad bridge in the project areas but is planning on adding a second track and bridge over Limekiln Creek in a future Raymer to Bernson double tracking project.

Shokoufe Marashi
October 26, 2016

Page 2

3. As part of a future double tracking project the Northridge Metrolink Station would also receive a second platform to the north, to allow boardings from either track in either direction.
4. It appears that your project will impact the drainage in the vicinity of the railroad right-of-way. SCARRA will need to review and approve any modifications to drainage structures that interface with the railroad right of way.
5. Any existing railroad R/W fencing must not be removed and some new fencing during construction may be required to prevent any trespassing into the active railroad corridor.
6. Any construction activities adjacent to the active rail line will have to follow SCARRA Right-of-Way Encroachment procedures. These can be found on our website at www.metrolinktrains.com. All engineering and construction activities shall be coordinated with the SCARRA Engineering Department.

If you have any questions regarding these comments, please contact me at 213-452-0456 or via e-mail at mathieu@scrra.net.

Sincerely,

Ron Mathieu
Sr. Public Projects Specialist

Co: Elizabeth Carvajal, Metro
    Dana Tinio, Metro
    Jay Fuhrman, Metro
    Roderick Diaz, SCARRA
    Patricia Watkins, SCARRA
    Naresh Patel, SCARRA
Comment Letter 1: Southern California Regional Rail Authority (SCRRA)

Response 1-1
This comment includes introductory remarks and background information, and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft IS/MND. No further response to this comment is required.

Response 1-2
Comment noted.

Response 1-3
The proposed construction staging and laydown area for the project is located within the Wilkinson Multi-purpose Senior Center parking lot. The Metrolink Northridge Station and its parking lot will not be disrupted during the construction of the project. A note has been added to the plans stating as such.

Response 1-4
Construction for this project will occur from 2017 to 2019. There is no work within the right of way (ROW). Comment noted.

Response 1-5
Comment noted.

Response 1-6
There will be no change in drainage. The grading associated with the project will drain into the proposed project and not toward the ROW.

Response 1-7
The plans currently show existing Metrolink/SCRRA ROW fencing as protect-in-place. A note has been added to the requiring the Contractor to erect fencing as necessary to restrict access to the Metrolink/SCRRA property.

Response 1-8
A note has been added to the plans stating that construction activities shall not encroach onto Metrolink/SCRRA property.
October 26, 2016

City of Los Angeles Department of Public Works
Bureau of Engineering, EMG
Attention: Shokoufe Marashi, Environmental Supervisor
1149 S. Broadway, Suite 600, Mail Stop 939
Los Angeles, CA 90015-2213

RE: Aliso Creek-Limekiln Creek Restoration Project -- City of Los Angeles -- Notice of Intent to Adopt a Mitigated Negative Declaration

Dear Ms. Marashi:

Thank you for the opportunity to comment on the Aliso Creek-Limekiln Creek Restoration Project at 8956 Vanalden Avenue. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency’s statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Project Description:

The Aliso Creek-Limekiln Creek Restoration Project involves an 11.8-acre site located in the Northridge Community of the City of Los Angeles at 8956 Vanalden Avenue, west of Golden State Freeway (Interstate 5), north of Ventura Freeway (US Highway 101), south of Ronald Reagan Freeway (CA State Route 118), and East of Chatsworth Reservoir. This project would improve the existing water quality of dry-weather urban runoff and portion of wet-weather stormwater from the creeks prior to discharging back into Aliso Creek, Limekiln Creek and ultimately to the Los Angeles River. The proposed project would comply with Proposition O funding criteria while also providing multiple benefits to the neighborhood with improved education opportunities, wildlife habitats, and restoring vegetation. This project will also improve climate change adaptability, increase sustainability, replenish natural resources, and improve the community’s quality of life.

Metro Comments:

Metrolink Commuter Rail Operations:

It is noted that part of the project site includes Metro-owned Railroad Right-of-Way (ROW). This ROW is operated and maintained by the Southern California Regional Rail Authority (SCARRA) to run the Metrolink commuter rail service, Amtrak intercity passenger trains and Union Pacific Railroad freight trains also operate on this line. The following concerns related to the project’s proximity to the ROW should be addressed:

1. The project sponsor is advised that rail service operates in both directions and that trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the ROW adjacent to the proposed project.
2. Where the property is immediately adjacent to Metrolink ROW (owned by Metro), all structures, walls, and fences as part of the development should be set back five (5) feet from property line to allow adequate space for property maintenance. Property owners will not be permitted to access Metrolink property to maintain private development.

3. Considering the proximity of the proposed project to the railroad ROW, trains will produce noise, vibration and visual impacts. A recorded Noise Easement Deed in favor of Metro is required, a form of which is attached. The easement recorded in the Deed will extend to successors and tenants, as well. In addition, any noise mitigation required for the project will be borne by the developers of the project and not Metro or the operating railroads.

4. There shall be no encroachment onto the railroad ROW. Any future work performed on the proposed project’s structures or property requiring access to the railroad ROW, shall be covered by specific Right-of-Entry temporary access permits with specific requirements. SCRRRA should be contacted for these Right-of-Entry requirements. Information can be found on their website at www.metrolinktrains.com. Other requirements may include permits for construction of buildings, and any future repairs, painting, graffiti removal, etc, including the use of overhead cranes or any other equipment that could potentially impact railroad operations and safety. Frequent access for maintenance tasks such as graffiti removal, will necessitate an active license agreement. This agreement will include an annual license fee, and other requirements that meet safety standards for access to a ROW with active rail operations.

5. During construction, a protection barrier shall be constructed to prevent objects, material, or debris from falling onto the ROW.

6. The project sponsor will be required to notify Metro and SCRRRA of any changes to the construction/building plans that may or may not impact the ROW.

7. Metro and/or SCRRRA staff shall be permitted to monitor construction activity to ascertain any impact to the ROW.

Metrolink will be sending a separate letter to address more specific concerns relating to this project.

If you have any questions regarding this response, please contact Elizabeth Carvajal at 213-922-3084 or by email at DevReview@metro.net.

Metro Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952

Sincerely,

Elizabeth Carvajal
Sr. Manager, Transportation Planning

Attachment: Noise Easement Deed
Comment Letter 2: Metro

Response 2-1
This comment includes introductory remarks and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft IS/MND. No further response to this comment is required.

Response 2-2
Please refer to response 2-1 above.

Response 2-3
This comment has been noted. The use of the area will not change. No further response to this comment is required.

Response 2-4
The proximity of the railroad right-of-way has been taken into account in the draft IS/MND analysis as part of the existing environment. Noise mitigation measures provided in the draft IS/MND would be implemented by the City. There are no additional public improvements proposed. The area immediately adjacent to the ROW will not be accessible to the public.

Response 2-5
There are no proposed items and construction work within the Metrolink/SCRRA ROW. Access to the Metrolink/SCRRA ROW is not required for the construction or maintenance. Construction access to work within Limekiln Creek will remain within Limekiln Creek (owned by LACFCD), which crosses under the existing railroad. Limits of work shown on the plans are shown at an offset for clarity. A note has been added to the plans stating that Metrolink/SCRRA property shall not be used for construction and maintenance access. The existing fence will be left untouched.

Response 2-6
The existing fence will remain and there is no work proposed within the ROW.

Response 2-7
The City would coordinate with Metro to and SCRRA throughout the final design and construction of the project by sending updated plans to the agencies.

Response 2-8
A note has been added to the plans stating that Metrolink and/or SCRRA staff is permitted to monitor construction activity.
November 07, 2016

Mr. Shokoufe Marashi
City of Los Angeles
Bureau of Engineering
1149 South Broadway, 6th Floor
Los Angeles, CA 90015

RE: Aliso Creek-Limekiln Creek
Restoration Project
Mitigated Negative Declaration
SCH# 201601027
IGR# 07-LA-2016-00220
Vic. LA/118/PM R5.909

Dear Mr. Marashi:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project consists of implementation of water quality improvements including diversion and treatment of all dry weather and a portion of wet weather flows; construction of biofiltration basins; restoring vegetation; and subsurface irrigation. The project also provides open space and education opportunities.

The nearest state facilities to the proposed project is SR-118. Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

Caltrans continues to strive to improve its standards and processes to provide flexibility while maintaining the safety and integrity of the State’s transportation system. It is our goal to implement strategies that are in keeping with our mission statement, which is to “provide a safe, sustainable, integrated, and efficient transportation system to enhance California’s economy and livability.”

Caltrans is aware of the challenges that the region is faced with in identifying viable solutions to reducing congestion on State facilities. Caltrans encourages implementation of Active Transportation amenities that will provide an attractive alternative to driving. Caltrans will work with City to look for every opportunity to develop project that improve safety and connectivity for pedestrians and bicyclists.

As a reminder, any transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods. In addition, a truck/traffic construction management plan may be needed for this project. If one has been prepared, please submit for Caltrans’ review.

“Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability”
Mr. Shokoufe Marashi
11/07/2016
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Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that project needs to be designed to discharge clean run-off water.

If you have any questions or concerns regarding these comments, please contact project coordinator, Frances Lee at (213) 897-0673 or electronically at frances.lee@dot.ca.gov.

Sincerely,

DIANNA WATSON
Branch Chief, Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"
Comment Letter 3 : Department of Transportation (Caltrans)

Response 3-1
This comment includes introductory remarks and background information, and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft IS/MND. No further response to this comment is required.

Response 3-2
Please refer to response 3-1 above.

Response 3-3
Please refer to response 3-1 above.

Response 3-4
This comment includes introductory remarks and background information, and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the Draft IS/MND. No further response to this comment is required.

Response 3-5
The Draft IS/MND, transportation and traffic section states that delivery and hauling shall not be performed during peak hours. If deliver and hauling activities need to occur during the peak hours, the number of peak-hour trips shall remain less than 50. The memo also says an estimated 48 truckloads are expected during Sequence 1, 24 truckloads during Sequence 2, and 5 truckloads during Sequence 3. It is not anticipated that the contractor use a large excavator. In the event that the contractor decides to use oversized equipment, they will then apply for all the associated permits.

Response 3-6
As discussed in ISMND, the purpose of the project is to treat and improve the existing water quality of dry-weather urban runoff and part of wet weather storm water from the creeks prior to discharging back to Aliso Creek and Limekiln Creek and ultimately to the Los Angeles River.
Comment Letter 4

*Aliso Creek-Limekiln Creek Restoration Project*

Rosas, Maria <maria.rosas.803@my.csun.edu>

To me

Good morning Mr. Marashi,

This email is in response to your invitation for community comments on the above mentioned project in Northridge. I am a resident of the Northridge Mobile Home Park for seniors that is on the SW corner of Nordhoff and Vanalden. The homes in this senior mobile home park are in jeopardy of being impacted by the excavation to take place in the Vanalden Park. Has there been any discussion or consideration of the possible impact and what precautions and responsibility the city plans to take in response?

My mobile home abuts the park, and is in very close proximity to one of the proposed basin areas. In reading the report accompanying the notice of the project, it states that proper surface drainage is imperative for satisfactory site performance and positive drainage should be provided to direct surface water away from the project’s foundation. Will drainage be directed towards our homes that do not have a solid foundation and are suspended on supports that sit on the ground’s surface? What assurances do we have that the integrity of our homes won't be affected?

The report also points out that activities can affect site conditions. How will the freight trains commuting through Northridge, within just a few yards of the project, affect the project site or even our homes after the soil is excavated and shifted, pipes laid etc.?

The report recommends additional exploration and testing to further evaluate TPH impacts on site. Has this additional testing been done? What are the results?

Lastly, the report recommends a pre-construction conference be held in order to discuss the grading recommendations presented in the report, including the owner and/or their representative, the governing agencies’ representatives, the civil engineer, Ninyo & Moore, and the contractor to discuss the work plan, project schedule, and earthwork requirements. What about community representatives at the table to learn what will be happening really is in our backyard.

Thank you for the opportunity to comment. I look forward to further dialog.
Comment Letter 4 : Maria Rosas

**Response 4-1**
The potential impact and mitigations measures are discussed in the Draft IS/MND.

No impacts are anticipated to the homes in mobile home park by excavation.

**Response 4-2**
Drainage will not change from existing condition. Further future grading will convey flow to the basins.

**Response 4-3**
Excavation is approximately 70 feet from the centerline of the tracks. Impact to the tracks should be negligible. Excavation on the westerly side of the project should have no impacts on the adjacent property. Additional testing will be included during construction as the soil is excavated.

**Response 4-4**
Additional testing will be included during construction as the soil is excavated.

**Response 4-5**
Two public outreach meetings were scheduled in 2016, to explain the project and address community questions. The first meeting, coordinated by the Northridge south Neighborhood Council on October 15, 2016, was held during the public review period. The second meeting was held at the Wilkinson Senior Center on November 25, 2016, after the comment period for IS/MND ended.