

MITIGATION MONITORING PLAN

FOR

Green Acres Farm Biosolids Land Application Project

Final Environmental Impact Report
State Clearinghouse Number 2013021021

Prepared For

**CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF SANITATION**

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Introduction

This mitigation monitoring plan contains the elements required by the California Environmental Quality Act (CEQA) for the Green Acres Farm (Farm) Biosolids Land Application Project (Project). Under CEQA, public agencies are required 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. The program must be adopted by the public agency at the time findings are made regarding the project (Public Resources Code Section 21081.6). The State CEQA Guidelines (Section 15097 (c)) allow public agencies to choose whether its program will monitor mitigation, report on mitigation, or both.

Mitigation Measures

Enforcement of the mitigation monitoring requirements described in this plan is primarily the responsibility of the City as the lead agency under CEQA. The mitigation measures discussed herein are primarily the responsibility of the Farm to implement. To demonstrate compliance, documentation that mitigation measures have been implemented will be maintained by the Farm to ensure potential environmental impacts are mitigated to the greatest extent feasible.

Analysis of the proposed Project in the Final EIR indicated that it has the potential to results in project-specific and cumulatively significant impacts related to air quality. Analyses of all other environmental topic areas indicate that impacts from the proposed Project would be less than significant and, as a result, additional mitigation measures would not be required. For significant impacts, potential mitigation measures were assessed for applicability for the proposed Project. In addition, because this is a retrospective analysis, the mitigation measures from the previous Program EIRs (PEIRs) (see Final EIR for discussion) from 1989 and 1996 were also considered and assessed for applicability for all environmental areas, even if no significant impacts are expected.

The following subsections 1) list the significant impacts, if any, for a given environmental area; 2) describe the mitigation measures considered in this analysis and which, if any, of those measures were imposed on the proposed Project; 3) indicate which, if any, of the mitigation measures from the 1989 and 1996 Program EIRs are applicable to the proposed Project; 4) identify the entity responsible for implementing the mitigation measures; and 5) identify the entity responsible for monitoring implementation of mitigation measures.

Air Quality Impacts and Mitigation Measures Considered

The proposed Project has the potential to generate significant adverse air quality impacts as the operation-related emissions of oxides of nitrogen (NO_x) exceed the SJVAPCD's significance threshold.

The City reviewed the 1989 PEIR mitigation measures and available mitigation guidelines from the South Coast Air Quality Management District (SCAQMD)¹ and SJVAPCD² to assess

¹ SCAQMD. 2010. Mitigation Measures and Control Efficiencies. Available at: http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html. Accessed November 2013.

² SJVAPCD. Air Quality Mitigation Strategies. Available at: http://www.valleyair.org/transportation/air_quality_mitigation_strategie.htm. Accessed November 2013.

potential mitigation measures that could be incorporated into this proposed Project. Most mitigation measures reviewed were found by the City not to be applicable. The following measures were potentially applicable and analyzed further:

- a) Diesel particulate filter (DPF) Level 3 plus Verified Diesel Emission Control Strategies (VDECS): Reduces NO_x emissions by 25% to 40%.
 - This technology would not be feasible during the time Project frame of 2000-2010 because they were not California Air Resources Board (CARB)-certified and available during that time frame. (Note: the current City truck fleet that hauls biosolids to the Farm has model year 2007 or newer engines, which meet or are cleaner than these Level 3 retrofit standards.)
- b) Use alternative fuels for construction equipment. Reduces NO_x emissions by a variable amount (depending on equipment)
 - This is not feasible because the proposed Project does not involve construction activities.
- c) Use of Tier 4 engines in non-road vehicles. Reduces NO_x emissions by a variable amount (depending on Tier used).
 - CARB notes that Tier 4 non-road engines will not be available in most horsepower ranges until 2014 or 2015, and thus would not have been available during the 2000-2010 Project time frame.

No additional mitigation measures were identified that were determined by the City to be applicable and feasible for the proposed Project. The City has been involved in several programs, including the upgrading of several agricultural pumps to Tier 3 units using grant programs administered by SJVAPCD. The City will continue its communications on-going with SJVAPCD about potential changes to various farm equipment and vehicles.

The mitigation measures from the 1989 and 1996 PEIRs were also assessed for applicability to the Project. As shown in Table 3-12 (page 48) of the Draft EIR, none are applicable to the proposed Project.

Greenhouse Gases Impacts and Mitigation Measures Considered

Operation-related emissions of greenhouse gases (GHGs) were found to be less than significant. However, mitigation measures from the California Air Pollution Control Officers Association (CAPCOA) were considered for this analysis. In addition, although the PEIRs from 1989 and 1996 did not include a GHG analysis (as a GHG analysis was not required by CEQA at the time of preparation), the mitigation measures from those analyses were reviewed for applicability to the proposed project. As shown in Table 3-17 (page 61) of the Draft EIR, none of the mitigation measures from the above sources were found by the City to be applicable to the proposed Project.

Hydrology/Water Quality Impacts and Mitigation Measures Considered

Hydrology/water quality impacts were found to be less than significant. As a result, no mitigation measures were considered for this analysis. Although there are no significant impacts, the mitigation measures from the 1989 and 1996 PEIRs were reviewed for applicability to the

proposed Project. As shown in Table 3-21 (page 78) of the Draft EIR, three mitigation measures from the 1989 PEIR are carried forward. [As described in the Final EIR, Section 3, the table reference should be Table 3-20. See page 20 of the Final EIR.] The City will continue to implement their portion of these applicable mitigation measures.

- a) Contain runoff from the site from contacting surface water.
 - The Farm has a tail water and runoff water recovery system that prevents excess water from leaving the Farm where it can potentially impact surface waters. This mitigation measure applies to the proposed Project.
- b) Implement good housekeeping practices and a spilling-containment system at material transfer locations to mitigate sludge spills. Clean up the spilled materials as much as possible and place it back into the transportation vehicle or back on the stockpile.
 - RBM developed *Guidelines for the Safe Transportation of Biosolids and Emergency Spill Response Plan* (Revised August 2008) to address spill containment and clean-up. These guidelines and plan are used to implement good housekeeping practices and mitigate potential impacts from spills, and are reviewed annually. This mitigation measure applies to the Proposed project.
- c) A groundwater-monitoring program should be established, especially for monitoring nitrate concentrations. If enrichment of groundwater with nitrates is observed, sludge application rates should be reduced to the agronomic rate or less. Agronomic rates should be calculated for the particular site, using site-specific data.
 - The City of Bakersfield is responsible for any groundwater monitoring that is conducted. If the enrichment of water with nitrates is observed, the Farm/City of Los Angeles will calculate an updated agronomic rate and adjust the amount of biosolids that are land applied accordingly.

Land Use/Planning Impacts and Mitigation Measures Considered

Land use/planning impacts were found to be less than significant. As a result, no mitigation measures were considered for this analysis. Although there are no significant impacts, the mitigation measures from the 1989 and 1996 PEIRs were reviewed for applicability to the proposed project. As shown in Table 3-23 (page 88) of the Draft EIR, none of the mitigation measures are applicable to the proposed Project.

Operations Phase

Table 1 summarizes the mitigation measures the City will continue to implement related to the Project, even though they do not address significant impacts of the Project. These measures are denoted MMWater-1, MMWater-2, and MMWater-3, although in the 1989 PEIR they were listed without names as described above.

Table 1. Continuing Implementation of Applicable 1989 PEIR Mitigation Measures

Mitigation Measure	Implementation Responsibility	Enforcement Responsibility
Hydrology/Water Quality		
<p>MMWATER-1: Contain runoff from the site from contacting surface water</p>	City and Farm operators	City
<p>MMWATER-2: Implement good housekeeping practices and a spilling-containment system at material transfer locations to mitigate sludge spills. Clean up the spilled materials as much as possible and place it back into the transportation vehicle or back on the stockpile</p>	City and Farm operators	City
<p>MMWATER-3: Establish a groundwater-monitoring program, especially for monitoring nitrate concentrations. If enrichment of groundwater with nitrates is observed, reduce sludge application rates to the agronomic rate or less. Calculate agronomic rates for the particular site using site-specific data</p>	<p>The City of Bakersfield is responsible for any groundwater monitoring that is conducted. If the enrichment of water with nitrates is observed, the Farm/City of Los Angeles will calculate an updated agronomic rate and adjust the amount of biosolids that are land applied accordingly.</p>	City of Bakersfield and the Farm/City of Los Angeles