# Errata and Response to Comments on the Initial Study/Mitigated Negative Declaration

# Headworks Site Development Project

**State Clearinghouse No. 2024041114**

**Lead Agency:**

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

**August 2024**

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**APPENDICES**

# 1 INTRODUCTION

## 1.1 Overview of the Project

The Los Angeles Department of Water and Power (LADWP) proposes to develop three facilities within its existing Headworks Spreading Grounds (HWSG) property, located along the northwest edge of Griffith Park in the City of Los Angeles. The facilities would include a Water Quality Laboratory (WQL), a Direct Potable Reuse (DPR) Demonstration Facility, and a public park (Headworks Restoration Park), which are the components of the Headworks Site Development Project (referred to herein as the proposed project or project). The purpose of the WQL is to replace the existing obsolete LADWP laboratory facility, which is located in the City of Pasadena. The purpose of the DPR Demonstration Facility is to test various water purification technologies for treating recycled wastewater to help the City of Los Angeles meet the goal to recycle all of its wastewater for beneficial reuse by 2035. The purpose of Headworks Restoration Park is to provide recreational access and educational opportunities regarding local ecosystems and water use. The proposed project would also include roads interior to the HWSG property, surface parking for staff and visitors, landscaping, and security lighting and fencing where required.

## 1.2 CEQA Environmental Process

The California Environmental Quality Act (CEQA; California Public Resources Code Section 21000 et seq.) applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The construction and operation of the Headworks Site Development Project constitute a project as defined by CEQA (California Public Resources Code Section 21065). The CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387) Section 15367 states that a lead agency is “the public agency which has the principal responsibility for carrying out or approving a project.” Therefore, as a municipal utility with discretionary approval authority for the proposed project, LADWP is the lead agency responsible for compliance with CEQA for the project.

As the CEQA lead agency, LADWP must complete an environmental review to determine if implementation of the proposed project would result in significant adverse environmental impacts and to propose measures, as feasible, to eliminate or reduce any such identified impacts. LADWP has prepared an Initial Study (IS) to assist in making that determination. Based on the nature and scope of the proposed project and the evaluation contained in the IS environmental checklist, LADWP, as the lead agency, has concluded that a Mitigated Negative Declaration (MND) is the proper level of CEQA environmental documentation for the project. The IS demonstrated that impacts caused by the proposed project would either be less than significant or reduced to a less than significant level with the incorporation of appropriate mitigation measures. This conclusion is supported by CEQA Guidelines Section 15070, which states that an MND can be prepared when the IS identifies potentially significant effects, but the proposed project would either include revisions to the project plans or incorporate mitigation measures that would avoid the effects or reduce them to a less than significant level.

### 1.2.1 Draft IS/MND and Notice of Intent

The Draft IS/MND was distributed on April 25, 2024, for a 30-day public review period pursuant to CEQA and its implementing guidelines. The purpose of the public review period was to provide interested public agencies, organizations, and individuals the opportunity to comment on the discussion and conclusions in the IS/MND regarding potential environmental impacts of the proposed project. The IS/MND and Notice of Completion were distributed to the California Office of Planning and Research, State Clearinghouse. A Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration was distributed to approximately 40 agencies, Native American tribal contacts, and

community stakeholders. The NOI informed them of where the IS/MND could be reviewed and how to comment. A copy of the IS/MND was posted on the LADWP website at http://www.ladwp.com/reports/environmental-reports, and contact information was provided where the public could request a copy of the document.

# 2 ERRATA TO THE DRAFT IS/MND

The following clarifications and modifications are intended to update the IS/MND in response to the comments received during the public review period. These changes are incorporated into the IS/MND, to be presented to the City of Los Angeles Board of Water and Power Commissioners for adoption and project approval. None of these changes to the IS/MND represent a substantial change to the proposed project that would alter the conclusions reached in the IS/MND. Revisions made to the IS/MND have not resulted in the identification of new significant impacts requiring mitigation measures, nor has the severity of a previously identified impact increased. Pursuant to CEQA Guidelines Section 15073.5, none of the CEQA criteria for recirculation have been met, and recirculation of the MND is not warranted.

The changes to the IS/MND are listed by section, page number, and paragraph number if applicable. Text which has been removed is shown with a ~~strikethrough~~ line, while text that has been added is shown as underlined. Please refer to Section 3, Response to Comments, for referenced comment letters and corresponding comments.

Page Clarification/Modification

9 *In response to Comment 5-2, the second to last sentence in the fourth paragraph on this page has been modified as follows:*

Design and construction of the ~~bicycle~~ pathways will ~~consider the existing equestrian trail and~~ allow for future connection to the Los Angeles River Trail but would maintain exclusive equestrian use of the existing tunnels beneath SR-134 and Forest Lawn Drive.

13 *In response to Comment 4-6, the last sentence in Section 1.7.2 on this page has been modified as follows:*

It is anticipated that groups of about 20 to 40 people, including organizations, students, and members of the general public, would visit the DPR Demonstration Facility for tours about twice weekly on average.

15 *In response to Comments 6-3 and 6-4, the approvals and permits list on this page has been modified as follows:*

**City of Los Angeles Department of Recreation and Parks**

- Tree Removal Permit
- Design Review and Approval

16 *In response to Comment 3-4, the approvals and permits list on this page has been modified as follows:*

**California Department of Transportation**

- Transportation Permit

30 *In response to Comment 5-3, the first sentence in the first paragraph of this page has been modified as follows:*

A bicycle trail would be constructed along the northern side of the property, allowing for future interconnections with Griffith Park and the existing river trail system ~~via existing tunnels beneath Forest Lawn Drive and SR-134~~ at the east end of the HWSG property.

30 *In response to Comment 6-5, the first sentence in the third paragraph on this page has been modified as follows:*

The Los Angeles County portion of the Air Basin is presently designated as nonattainment under either the federal or state ambient air quality standards for $O_3$, $PM_{10}$, and $PM_{2.5}$ (lead is designated as partial non-attainment, but an attainment redesignation request is pending).

45 *In response to Comment 6-3, the analysis on this page has been modified as follows:*

Trees have reestablished along the southern perimeter of the HWSG property after the spreading grounds function at the property was discontinued in the early 1980s. These trees are a mix of native and non-native species and do not constitute an intact natural community. Nonetheless, a permit may be required for the removal or pruning of any of the protected tree species. Coast live oak, western sycamore, toyon, and blue elderberry were identified within these stands along the southern perimeter. A limited number of these trees and shrubs may be impacted at the proposed primary entry to the project site at Mt. Sinai Drive and Forest Lawn Drive, and south of the proposed DPR Demonstration Facility. Impacts to any ordinance-protected species would be determined during final design. A Tree Removal Permit in compliance with the City's Native Tree Protection Ordinance would be required for the removal of any protected tree. With issuance of a tree removal permit from Public Works and implementation of compensation to mitigate for tree removals pursuant to the permit requirements, the project would be in compliance with the Native Tree Protection Ordinance, and direct impacts to ordinance-protected species would be less than significant.

The City of Los Angeles Department of Recreation and Parks (RAP) Forestry Division oversees tree operations within the City's parkland, including trees located within the HWSG property that are not protected species. The proposed project would be required to follow RAP's Tree Removal Procedure for trees within the project site that are considered Heritage Trees, Special Habitat Value Trees, and Common Park Trees. Impacts to these trees, including pruning, removal, or work within the tree's dripline, would require approval from the RAP Forestry Division staff. With approval from RAP's Forestry Division and compliance with the Tree Removal Procedure, the project would result in less than significant impacts to Heritage Trees, Special Habitat Value Trees, and Common Park Trees.

The City of Los Angeles Department of Public Works also manages removal, replacement, and maintenance of the City's street trees and landscaped median islands. "Street trees" are those occurring in the public right-of-way, and a permit from Public Works Urban Forestry Division is required to remove a street tree. Under Los Angeles Municipal Code Section 62.170, as a condition to the permit, the permittee may be required to plant another tree of the type and size specified in the permit. However, in accordance with Los Angeles Municipal Code Section 62.177, a payment of in-lieu fees for the purchase,

installation, and maintenance of trees is allowable when the required replacement trees cannot feasibly be planted on site.

In the event it is determined that street trees would require removal to accommodate construction of the proposed primary entrance point to the project site, LADWP would obtain a street tree removal permit from the City of Los Angeles Department of Public Works, and the appropriate compensation to mitigate any street tree removals would be completed in compliance with the City's street tree policy. With adherence to existing regulations and permitting requirements, the proposed project would not conflict with any local policies or ordinances protecting biological resources. The impact would be less than significant.

78 *In response to Comment 4-2, Mitigation Measures NOI-4 and NOI-5 on this page have been modified as follows:*

**NOI-4**: A public liaison shall be appointed for project construction and will be responsible for coordination with Memorial Parks (Forest Lawn and Mount Sinai) during the construction process and addressing public concerns about construction activities, including excessive noise. 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.

**NOI-5:** The public, including the adjacent Memorial Parks, shall be notified in advance of the location and dates of construction hours and activities.

90 *In response to Comment 5-3, the fourth sentence in the first paragraph of this page has been modified as follows:*

The trail would connect on the east to Forest Lawn Drive and allow for future connection to existing trails ~~that pass through existing tunnels beneath Forest Lawn Drive into Griffith Park and SR-134 to the path~~ running along the south side of the river.

# 3 RESPONSE TO COMMENTS

A total of six comment letters were received on the Draft IS/MND. Each letter has been assigned a number code, and individual comments in each letter have also been coded to facilitate the responses. For example, the letter from the California Department of Water Resources is identified as Comment Letter 1, with the comments noted as 1-1 and 1-2. 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 IS/MND are noted but, in accordance with CEQA, did not receive a detailed response.

The written comment letters received on the IS/MND are listed in Table 3-1 below. The comments and associated responses are arranged first by the date on which the comment letter was received and then alphabetically by commenter. Each comment in the letters has been numbered and is referenced in the response that directly follow the comment letter.

**Table 3-1**
**List of Written Comment Letters Received in Response to the Draft IS/MND**

| Letter # | Agency/Organization/Interested Party | Date | Page # of Response |
|---|---|---|---|
| ***Agencies/Organizations*** | | | |
| 1 | California Department of Water Resources | May 22, 2024 | 3-3 |
| 2 | South Coast Air Quality Management District | May 24, 2024 | 3-7 |
| 3 | California Department of Transportation | May 28, 2024 | 3-12 |
| 4 | Forest Lawn Memorial Park & Mortuaries | May 28, 2024 | 3-19 |
| 5 | Los Angeles City Council District 4 | May 28, 2024 | 3-26 |
| 6 | City of Los Angeles Department of Recreation and Parks | June 24, 2024 | 3-29 |

Comment Letter No. 1



STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY GAVIN NEWSOM, Governor

**DEPARTMENT OF WATER RESOURCES**
P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791

May 22, 2024

James Howe, Environmental Specialist
Los Angeles Department of Water and Power
111 N. Hope St., Room 1044
Los Angeles, California 90012

Headworks Site Development Project
SCH# 2024041114
Los Angeles County

Dear Mr. Howe:

The Division of Safety of Dams (DSOD) has reviewed the Mitigated Negative Declaration for the Headworks Site Development Project, submitted by Los Angeles Department of Water and Power, which describes the development of three facilities within the Headworks Spreading Ground property: a Water Quality Laboratory (WQL), a Direct Potable Reuse (DPR) Demonstration Facility, and a public park (Headworks Restoration Park). 1-1

As proposed, portions of the work will be subject to the jurisdiction of DSOD, specifically the proposed Headworks Park that is to be located on top of the Headworks West Reservoir (Dam No. 6-56) and all work that will be completed within 10 feet of the dam, in all directions. As such, an alteration application, together with plans, specifications, and the appropriate filing fee, must be filed with DSOD for the work. All dam safety related issues must be resolved prior to approval of the application, and the work must be performed under the direction of a civil engineer registered in California. Erik Malvick, our Design Engineering Branch Manager, is responsible for the application process and can be reached at (916) 820-7820. 1-2

If you have any questions or need additional information, you may contact Area Engineer Cameron Lancaster at (916) 565-7830 or me at (916) 565-7827.

Sincerely,

Brandon Cruz

Brandon Cruz, P.E., Regional Engineer
Southern Region
Field Engineering Branch
Division of Safety of Dams

cc: Governor's Office of Planning and Research
State Clearinghouse
state.clearinghouse@opr.ca.gov

## Comment Letter 1: California Department of Water Resources

### Response 1-1

This comment includes introductory remarks. No further response to this comment is required.

### Response 1-2

The commenter states that Headworks West Reservoir is identified as Dam No. 6-56 and that all work on top of and within 10 feet of the reservoir is subject to the jurisdiction of the California Department of Water Resources, Division of Safety of Dams (DSOD). The commenter further states that an application and associated fee would be required for the proposed work occurring on and near Dam No. 6-56, which includes the proposed Headworks Restoration Park. LADWP would comply with all applicable DSOD regulations for construction on and near the Headworks West Reservoir. LADWP would coordinate with DSOD regarding the required application materials, including plans, specifications, and payment of fees. Additionally, LADWP would work with DSOD to resolve dam safety related issues, if any, prior to approval of the application and work would be performed under the direction of a civil engineer registered in California.

Comment Letter No. 2

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
James.Howe@ladwp.com
James R. Howe, Environmental Specialist
City of Los Angeles Department of Water and Power
111 N. Hope St., Room 1044
Los Angeles, CA 90012

May 24, 2024

**Mitigated Negative Declaration (MND) for the Proposed Headworks Site Development Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to review the above-mentioned document. The City of Los Angeles Department of Water and Power (LADWP) is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff (Staff) has provided a brief summary of the project information and prepared the following comments.

South Coast AQMD Staff's Summary of Project Information in the MND

Based on information provided in the MND, the Proposed Project consists of construction and operation of three facilities within LADWP's existing Headworks Spreading Grounds (HWSG) site.[1] The Proposed Project site is approximately 43 acres and adjacent to the Los Angeles River and State Route 134.[2] The three facilities to be developed include 1) a Water Quality Laboratory (WQL) with 100,000 square feet (sq ft) of floor space; 2) a Direct Potable Reuse (DPR) Demonstration Facility to test various water purification technologies for treating recycled wastewater; and 3) a public park (Headworks Restoration Park) to provide recreational and educational opportunities regarding local ecosystems, the Los Angeles River, and water use.[3] Currently on the eastern portion of the Proposed Project site are two roofed reservoirs (Headworks West Reservoir and Headworks East Reservoir) with a combined storage capacity of 110 million gallons (MG).[4] A portion of the public park will be developed on top of the existing Headworks West Reservoir.[5] The Proposed Project site is owned by the Los Angeles Department of Recreation and Parks (LADRAP) but LADWP has a site easement.[6] The park would be managed by LADRAP but LADWP would maintain access to reservoirs and associated facilities.[7] The WQL would be equipped with diesel-powered emergency generators.[8] Construction of the Proposed Project is anticipated to commence in the third quarter of 2024, last seven years, and be completed by the fourth quarter of 2031.[9] The Proposed Project site is located within the boundaries of Griffith Park at 6001 West Forest Lawn Drive, Los Angeles, California 90068.[10]

2-1

South Coast AQMD Staff's Comments on the MND

[1] Draft Initial Study/Mitigated Negative Declaration for the Headworks Site Development Project (IS/MND). Pages 2 through 6.
[2] IS/MND. Pages 1 through 2.
[3] *Ibid.* Pages 8 through 9.
[4] *Ibid.* Page 2.
[5] *Ibid.* Page 6.
[6] *Ibid.* Page 1.
[7] *Ibid.* Page 13.
[8] *Ibid.* Page 8.
[9] *Ibid.* Page 11.
[10] *Ibid.* Page 1.

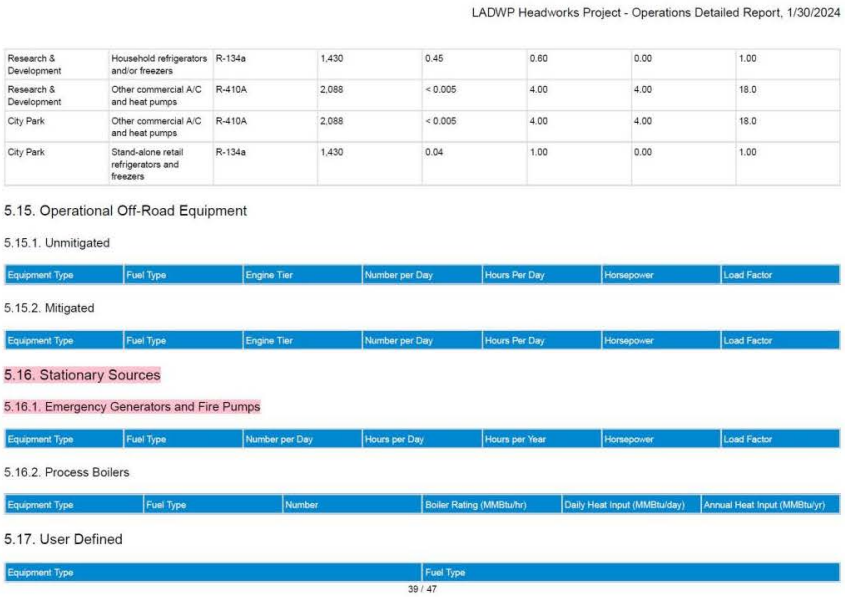
Comment Letter No. 2 Continued

James R. Howe, Environmental Specialist May 24, 2024

*South Coast AQMD Air Permits and Role as a Responsible Agency*

As mentioned above, Staff reviewed the MND and noted that the WQL would be equipped with diesel-powered emergency generators.[11] The Lead Agency also states in the MND that South Coast AQMD permits and/or approvals for construction and operation may be required.[12] If implementation of the Proposed Project would require the use of new stationary sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Section 15086, the Lead Agency is required to consult with South Coast AQMD. Furthermore, CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final MND should include a discussion about any new stationary equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. 2-2

The Final MND should also include calculations and analyses for construction and operation emissions for any new stationary sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Based on the CalEEMod output files in Appendix A (see screenshot below) and additional technical data files provided to Staff upon request (e-mail communication with James Howe, May 14, 2024), it appears that emission calculations and associated analyses for the WQL diesel-powered emergency generators were not included in the MND. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require applications for new air permits. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits. 2-3



LADWP Headworks Project - Operations Detailed Report, 1/30/2024

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Research & Development | Household refrigerators and/or freezers | R-134a | 1,430 | 0.45 | 0.60 | 0.00 | 1.00 |
| Research & Development | Other commercial A/C and heat pumps | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |
| City Park | Other commercial A/C and heat pumps | R-410A | 2,088 | < 0.005 | 4.00 | 4.00 | 18.0 |
| City Park | Stand-alone retail refrigerators and freezers | R-134a | 1,430 | 0.04 | 1.00 | 0.00 | 1.00 |

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

| Equipment Type | Fuel Type | Engine Tier | Number per Day | Hours Per Day | Horsepower | Load Factor |
|---|---|---|---|---|---|---|

5.15.2. Mitigated

| Equipment Type | Fuel Type | Engine Tier | Number per Day | Hours Per Day | Horsepower | Load Factor |
|---|---|---|---|---|---|---|

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

| Equipment Type | Fuel Type | Number per Day | Hours per Day | Hours per Year | Horsepower | Load Factor |
|---|---|---|---|---|---|---|

5.16.2. Process Boilers

| Equipment Type | Fuel Type | Number | Boiler Rating (MMBtu/hr) | Daily Heat Input (MMBtu/day) | Annual Heat Input (MMBtu/yr) |
|---|---|---|---|---|---|

5.17. User Defined

| Equipment Type | Fuel Type |
|---|---|

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**Figure 1. Screenshot of Appendix A, Air Quality Impact Study, LADWP Headworks Project – Operations Detailed Report, page 39/47**

[11] *Ibid.* Page 8.
[12] *Ibid.* Pages 14 through 15.

Comment Letter No. 2 Continued

James R. Howe, Environmental Specialist May 24, 2024

Conclusion
The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s). 2-4

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:EA
LAC240501-01
Control Number

## Comment Letter 2: South Coast Air Quality Management District

### Response 2-1

The commenter provides introductory remarks and accurately summarizes the description of the proposed project. No further response to this comment is required.

### Response 2-2

The commenter states that, if the proposed project would require the use of new stationary sources, permits from the South Coast Air Quality Management District (SCAQMD) will be required, and the role of the SCAQMD would change from Commenting Agency to Responsible Agency. Responsible Agencies use CEQA documents to approve projects or specific components of projects. This specifically applies to discretionary actions. However, the only potential new stationary sources identified for the project are diesel-powered emergency generators. The SCAQMD cannot deny a permit for an emergency backup power generator if the request complies with permitting requirements and standard operating procedures, including emissions limits specified in SCAQMD Regulation 1470 and Title 13 California Code of Regulations Section 2423. Since the approval or denial of a permit for an emergency backup power generator is a ministerial action and not a discretionary action, SCAQMD does not qualify as a Responsible Agency for the proposed project under CEQA. Therefore, no further consultation during the CEQA process is required for the proposed emergency generator.

### Response 2-3

The commenter requests additional information related to the emergency generators for the WQL. The Draft IS/MND presents maximum daily emissions associated with typical operational activities involving sources that would be active on a regular basis. This scenario, which does not result in a significant impact, represents a reasonable estimate of new, permanent emissions. An emergency generator would only be used in the event of a power outage and is not reflective of standard operating conditions.

For informational purposes and complete disclosure, LADWP estimated the emissions associated with the testing and maintenance of two emergency generators capable of supplying up to 600 kilowatts (kW) of electricity. SCAQMD regulations define an emergency generator as a unit that is permitted for less than 200 hours of annual use, and all emergency generators greater than 50 horsepower (hp) require SCAQMD permits under Rule 1470. To account for the emissions that would occur on days when the emergency generator is being tested for its reliability, the emissions modeling was augmented to include eight (8) hours of testing involving two 400-horsepower (hp) generators operating at 100 percent load capacity.

Table 3-2 below presents project-related emissions associated with the emergency generator being activated for testing and maintenance purposes. As shown, maximum daily emissions of nitrogen oxides ($NO_X$) would remain below the SCAQMD daily operational threshold. Therefore, project operations on days involving testing of the emergency generator would result in less than significant air quality impacts related to air quality violations or cumulatively considerable increases in nonattainment pollutants. No further evaluation of stationary source emissions is necessary, and no mitigation measures would be required.

**Table 3-2**
**Operational Emissions from Emergency Generators**

| Operational Activity | Daily Pollutant Emissions (Pounds Per Day) | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
| **Emissions Analysis** | | | | | | |
| Area Sources | 4.2 | <0.1 | 5.4 | <0.1 | <0.1 | <0.1 |
| Energy Sources | <0.1 | 0.7 | 0.6 | <0.1 | <0.1 | <0.1 |
| Mobile Sources | 1.4 | 0.6 | 5.7 | <0.1 | 1.0 | 0.4 |
| Stationary Sources (Eight-hour Generator Testing) | 14.4 | 40.2 | 36.7 | <0.1 | 2.1 | 2.1 |
| **Impact Analysis** | | | | | | |
| **Maximum Daily Operational Emissions** | **19.9** | **41.5** | **48.2** | **<0.1** | **3.1** | **2.4** |
| Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| ***Exceed Threshold?*** | ***No*** | ***No*** | ***No*** | ***No*** | ***No*** | ***No*** |

Source: Terry A. Hayes Associates Inc., 2024.

For comparison, Table 3-3 displays the maximum daily long-term emissions that would occur under standard operating conditions as disclosed in the Draft IS/MND. As demonstrated by the Draft IS/MND analysis, operation of the project would not generate levels of emissions close to any applicable SCAQMD regional threshold value, and the combined impacts of standard project operations and emergency generator testing would remain less than significant.

**Table 3-3**
**Operational Emissions Under Standard Operating Conditions**

| Operational Activity | Maximum Daily Emissions (Pounds Per Day) | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
| **Emissions Analysis** | | | | | | |
| Area Sources | 4.2 | <0.1 | 5.4 | <0.1 | <0.1 | <0.1 |
| Energy Sources | <0.1 | 0.7 | 0.6 | <0.1 | <0.1 | <0.1 |
| Mobile Sources | 1.4 | 0.6 | 5.7 | <0.1 | 1.0 | 0.4 |
| **Impact Analysis** | | | | | | |
| **Maximum Daily Operational Emissions** | **5.5** | **1.3** | **11.7** | **<0.1** | **1.1** | **1.2** |
| Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Exceed Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |

Source: LADWP, *Initial Study/Mitigated Negative Declaration for the Headworks Site Development Project*, 2024.

## Response 2-4

The commenter requests that revisions be made to the CEQA analysis for the proposed project in response to the comments they have provided. The commenter also requests that LADWP provide written responses to all comments received during the public review process and provide notification of any scheduled public hearings for the proposed project.

The written responses to comments received during the public review period are contained in this Errata and Response to Comments on the Draft IS/MND, which will be included as part of the administrative record for the proposed project. The administrative record will be forwarded to the decision-making bodies for their review and consideration. This Errata and Response to Comments on the Draft IS/MND will be posted on the LADWP website. All agencies,

organizations, and interested parties who provided written comments on the Draft IS/MND will be notified when the responses to their comments are available and informed of where the responses can be reviewed. Furthermore, the SCAQMD is included on the project mailing list and will continue to receive notices about the project, including future public hearings.

Comment Letter No. 3

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, Governor

**DEPARTMENT OF TRANSPORTATION**
DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 266-3562
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

*Making Conservation a California Way of Life*

May 28, 2024

Mr. James R. Howe
Los Angeles Department of Water and Power
111 N. Hope Street, Room 1044
Los Angeles, CA 90012

RE: Headworks Site Development Project:
Mitigated Negative Declaration (MND)
GTS # 07-LA-2024-04515
SCH # 2024041114
Vic. LA 134/PM 3.626
LA 5/PM 27.883

Dear Mr. James R. Howe:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The Project proposes to develop three facilities within its existing Headworks Spreading Grounds (HWSG) property, located along the northwest edge of Griffith Park in the City of Los Angeles. The facilities would include a Water Quality Laboratory (WQL), a Direct Potable Reuse (DPR) Demonstration Facility, and a public park (Headworks Restoration Park), which are the components of the Headworks Site Development Project (proposed project or project). The purpose of the WQL is to replace the existing obsolete LADWP laboratory facility, which is located in the City of Pasadena; the purpose of the DPR facility is to test various water purification technologies for treating recycled wastewater to help the City of Los Angeles meet the goal to recycle all of its wastewater for beneficial reuse by 2035; and the purpose of Headworks Park is to provide recreational access and educational opportunities regarding local ecosystems and water use. The proposed project would also include roads interior to the HWSG property, surface parking for staff and visitors, landscaping, public recreational space, and security lighting and fencing where required. The Los Angeles Department of Water and Power is the Lead Agency under the California Environmental Quality Act (CEQA). 3-1

The closest state facilities are SR-134 and I-5. After reviewing the project's documents, Caltrans has the following comments:

The lead agency's determination that this project is presumed to have less than significant VMT impact is consistent with the OPR SB 743 Technical Advisory's recommendation. Caltrans is in support of this project that helps achieve state planning priorities contained in state law and meets state policy goals on transportation, VMT reduction, GHG emissions reduction, and/or betterment of the environment and human health. 3-2

*"Provide a safe and reliable transportation network that serves all people and respects the environment."*

Comment Letter No. 3 Continued



Caltrans will require an Encroachment Permit for work performed within the State Right-of-way. Caltrans recommends that large-size truck travel be limited to off-peak commute hours. Caltrans requires a permit for any heavy construction equipment and or materials that require the use of oversized transport vehicles on State highways. 3-3 3-4

Caltrans recommends that the Project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review. 3-5

If you have any questions, please feel free to contact Jaden Oloresisimo, the project coordinator, at Jaden.Oloresisimo@dot.ca.gov and refer to GTS # 07-LA-2024-04515.

Sincerely,

Anthony Higgins for
MIYA EDMONSON
LDR/CEQA Branch Chief

cc: State Clearinghouse

*"Provide a safe and reliable transportation network that serves all people and respects the environment."*

## Comment Letter 3: California Department of Transportation

### Response 3-1

The commenter characterizes the proposed project described in the Draft IS/MND. This comment includes introductory remarks and does not state a specific concern or questions regarding the adequacy of the environmental impact analysis in the Draft IS/MND. Therefore, no further response to this comment is required.

### Response 3-2

The commenter states the closest existing state transportation facilities to the project site are SR-134 and I-5. The commenter states that the impact determination for vehicle miles traveled (VMT) in the Draft IS/MND is consistent with the recommendations of the Governor's Office of Planning and Research (OPR) SB 743 Technical Advisory. No further response to this comment is required.

### Response 3-3

The commenter states that an Encroachment permit is required for work performed within the State Right-of-way. As stated in Section 1.5.4, Vehicular Access and Traffic, on Page 9 of the Draft IS/MND, modifications to traffic lanes on Forest Lawn Drive would be required to provide a westbound right-turn and an eastbound left-turn lane. These modifications would be accommodated within the existing road right-of-way. Additionally, modifications to the existing traffic signal at the intersection of Forest Lawn Drive and Mt. Sinai Drive would also be required. Forest Lawn Drive and Mt. Sinai Drive are not state transportation facilities, and thus no work would be performed within the State Right-of-way. A Caltrans Encroachment permit would not be required.

### Response 3-4

The commenter recommends limiting large size vehicle trips to off-peak commute periods and states a permit is required for the use of oversized transport vehicles on State highways. As stated in Section 1.6, Project Construction, of the Draft IS/MND, the use of heavy equipment would be limited primarily to the excavation and grading tasks early in the construction process for the WQL and DPR Demonstration Facility. Furthermore, large trucks would be required to transport material to and from the project site throughout the construction period. As stated on Page 11-12 of the Draft IS/MND, unlike construction worker commute trips, which would be concentrated during early morning and late afternoon, truck trips would generally be distributed throughout the workday. The proposed project would be required to comply with all applicable Caltrans regulations during construction. As applicable, a Transportation Permit would be obtained from Caltrans for the use of oversized vehicles associated with the proposed project that would be expected to travel on state highways. In response to this comment, Section 1.8 of the Draft IS/MND has been modified to add a Caltrans Transportation Permit to the list of permits. The commenter is referred to Section 2, Errata to the Draft IS/MND.

### Response 3-5

The commenter recommends that construction traffic be limited to off-peak periods. As discussed in Section 1.6, Project Construction, of the Draft IS/MND, construction activities would typically occur Monday through Friday during the daytime hours, beginning no earlier than 7:00 a.m. and

generally ending by 5:00 p.m. Personnel may arrive on site prior to 7:00 a.m. and may remain on site after 5:00 p.m. As stated on Page 11-12 of the Draft IS/MND, unlike construction worker commute trips, which would be concentrated during early morning and late afternoon, truck trips would generally be distributed throughout the workday. Thus, worker-related trips would generally be within peak periods to accommodate construction work hours, but large vehicle trips associated with trucks and equipment would be distributed throughout the day.

Additionally, the commenter states that a construction traffic control plan be submitted to Caltrans for review if construction traffic would cause issues on any State facilities. As discussed in Section 1.6, Project Construction, of the Draft IS/MND, the estimated average daily number of on-site workers would peak at 88 for a 3-month period during the park construction, with several secondary peaks of approximately 55 and 60 workers during the 7-year project construction period, and it is conservatively assumed that each individual worker would generate a vehicle trip inbound to the project site in the morning and a vehicle trip outbound from the project site at the end of the workday. The estimated average daily number of off-site truck round-trips would peak at approximately 17 for a 3-month period during park construction. As noted by the commenter, the closest existing state transportation facilities to the project site are SR-134 and I-5. It is anticipated that SR-134 and I-5 would be used as regional routes to reach the project site. However, as the amount of worker and truck trips for the project would be nominal compared to the volume of traffic typically experienced by the two existing state transportation facilities, it is not anticipated that construction traffic would cause issues on the facilities. Thus, a construction traffic control plan would not be required to be submitted to Caltrans for review. However, a traffic control plan for construction would be required and approved by the City of Los Angeles Department of Transportation (LADOT) to maintain the flow of traffic within local transportation facilities (i.e., Forest Lawn Drive and Mt. Sinai Drive).

Comment Letter No. 4

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May 28, 2024

**VIA E-MAIL**

Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012
Attn: Mr. James R. Howe
james.howe@ladwp.com

Re: Comments on Initial Study/Mitigated Negative Declaration for Headworks Site Development Project (April 2024)

Dear Mr. Howe:

Forest Lawn Memorial-Park Association appreciates the opportunity to provide the following comments on the April 2024 Initial Study/Mitigated Negative Declaration (MND) for the Headworks Site Development Project.

Forest Lawn is a non-profit, non-denominational organization that has operated cemeteries in the Los Angeles area for over one hundred years. Forest Lawn's approximately 444-acre Hollywood Hills property has served the community for over 75 years and currently includes over 300,000 individual interment spaces. 4-1

Cemeteries are a distinct use, of a unique and sensitive nature. Forest Lawn Memorial-Park, Hollywood Hills fulfills a significant need in the community, as a sacred resting place for generations of Angelenos, in a serene and beautiful setting where families come to visit and remember loved ones. Funerals, internments, memorial services, visitations and other public gatherings occur at the Memorial-Park daily.

The Forest Lawn Memorial-Park is adjacent to the Headworks Site Development Project, as is the Mount Sinai Memorial Park.

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Comment Letter No. 4 Continued

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**Additional Measures are Necessary to Protect Cemetery Uses**

Given the nature of the cemetery use, it is important for guests and visitors to have a peaceful and dignified experience at both our Memorial-Park and Mount Sinai's Memorial Park. To that end, Forest Lawn respectfully requests that the Headworks Site Development Project incorporate all feasible design features and mitigation measures to minimize impacts to the Memorial-Parks.

Accordingly, Forest Lawn requests that LADWP include specific measures to protect the adjacent cemetery uses during construction and operation of the Headworks Site Development Project.

Construction management plans for the Headworks Site Development Project should be required and include the following measures to protect the adjacent cemetery uses:

- Advance notice and coordination with Forest Lawn, prior to commencement of construction, to discuss construction plans and schedules, haul routes and schedules, general traffic mitigation plans, and visual mitigation measures (e.g., screening of machinery and equipment, no visible construction staging)
- Direct access for Forest Lawn to construction site management to address immediate issues that may arise
- No construction on Sundays and holidays
- Prioritizing funeral procession traffic
- 72-hour notice of any major impairments to roadways near the Memorial-Parks

4-2

We suspect these issues would be of equal concern to Mount Sinai, although their days and hours of concern may differ.

In addition, the MND identifies potentially significant noise impacts during construction at the property lines of Forest Lawn Memorial-Park (as well as the Mount Sinai Memorial Park) and includes generic mitigation measures to reduce construction noise. Specific additional noise-reducing mitigation measures should be added to protect the cemetery uses, including, but not limited to:

- Advanced notice and coordination with Forest Lawn to minimize disruption to graveside services and to avoid interference with funeral processions

4-3



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Comment Letter No. 4 Continued

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- Screening of construction equipment and construction areas with noise-reducing materials (e.g., impermeable sound barriers) to achieve both visual screening and noise reduction
- Scheduling construction activities to avoid the simultaneous operation of construction equipment in proximity to the Forest Lawn Memorial-Park
- Locating construction equipment staging areas and dumpsters, and placing stationary noise sources, at the project site sufficiently distant from the Forest Lawn Memorial-Park to reduce noise impacts.
- Any audio equipment, radios or outdoor amplified sound system shall not be audible offsite.
- No truck traffic shall enter or exit the Headworks site at the secondary access point at the west end of the site to or from Forest Lawn Drive

4-3 Cont'd

Forest Lawn respectfully requests that these measures be included as mitigation measures for the Headworks Site Development Project to reduce potentially significant impacts to the cemetery uses. Similar measures might also be considered for Mount Sinai Memorial Park.

**Additional Information and Mitigation is Necessary for Forest Lawn Drive**

In addition to the measures requested above, Forest Lawn has questions and concerns related to the Headworks Site Development Project's impacts to Forest Lawn Drive. As noted above, Forest Lawn is an important public benefit use for the City and its residents. Each year, millions of people come to Forest Lawn Memorial-Park, Hollywood Hills. Forest Lawn Drive provides the only access to the Memorial-Park.

4-4

The MND indicates that modifications to traffic lanes on Forest Lawn Drive would be required to provide a westbound right-turn and an eastbound left-turn for the primary access to the site from Forest Lawn Drive at Mt. Sinai Drive, as well as modifications to the existing traffic signal there. According to the MND, temporary lane closures may be required during construction of the intersection modifications, and a traffic control plan would be prepared for review and approval by LADOT prior to project construction. Forest Lawn respectfully requests to be included in the traffic control plan review and approval process, particularly given the importance of maintaining access to the cemetery and prioritizing funeral processions.



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Comment Letter No. 4 Continued

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Also, the MND states that vehicular access to the site during construction would be provided at the gate at the west end of the Headworks property, and during operations, secondary access for employee, service, and maintenance vehicles would be provided from Forest Lawn Drive at the west end of the Headworks property. This access point appears to align with Greenwood Way, a secondary access point to the Forest Lawn Memorial-Park from Forest Lawn Drive. As such, it is important to understand what exactly is proposed and the amount of vehicular traffic expected to use that access point to the Headworks site to properly assess the potential impacts, both during construction and operation of the proposed project. For example, is this intended to be the primary access point during construction? Will haul trucks be using this western access point? How many employees, service, and maintenance vehicles are expected to use this access point during project operations? Will there be turning pockets from Forest Lawn Drive? Will it be right-turn only onto and from Forest Lawn Drive? Will it be controlled with a stop sign or signal? More information about the proposed use of this access point is necessary to assess potential impacts to Forest Lawn Drive and the adjacent cemetery uses and whether mitigation measures are needed during construction and/or operation to reduce potential impacts to a less than significant level. 4-5

Additionally, the MND indicates that groups of up to 20 people are anticipated to visit the Water Quality Laboratory about twice per month on average. The MND indicates that groups, including organizations, students, and members of the general public, are also anticipated to visit the Direct Potable Reuse Demonstration Facility for tours about twice weekly on average. However, the MND does not specify the size of the groups expected to tour the facility. How large would these groups be? How many people are expected to tour the facility during these tours? Will the tours be open to the public on a daily basis? 4-6

Relatedly, more information is necessary to assess the adequacy of the proposed parking. For example, the MND does not explain how the size of the parking area was determined, whether there will be sufficient parking to meet the needs of all of the proposed uses, including the park, or whether there will be sufficient bus parking areas for group tours. 4-7

It is important to fully disclose and analyze the extent of potential additional traffic on Forest Lawn Drive and potential traffic and parking impacts on the adjacent cemetery uses, and to determine whether additional measures are needed to address impacts. 4-8

Furthermore, will there be any other improvements to Forest Lawn Drive to accommodate the additional traffic/use? Will the roadway be improved ? Will curbs, gutter, drainage, 4-9

4

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Comment Letter No. 4 Continued

sidewalks, street lighting, and street trees be installed along Forest Lawn Drive? Please clarify what the possible improvement plans might be to Forest Lawn Drive. 4-9 Cont'd

**Coordination is Needed regarding Water Supply and Infrastructure**

As one of the City's legacy recycled water users on LADWP's Greenbelt recycled water system, Forest Lawn has worked closely with LADWP for decades on maximizing recycled water usage and efforts to improve the reliability of the recycled water system. Forest Lawn respectfully requests continued coordination with LADWP to ensure the long-term availability of water to serve the cemetery. The MND indicates that the advanced water purification facility (AWPF) included in the Direct Potable Reuse Demonstration Facility would receive an average flow of approximately 1.38 MGD of tertiary treated water from LAGWRP via the existing recycled water line in Forest Lawn Drive and a new connection to the AWPF. The MND also indicates that recycled water will be used to irrigate the park component of the proposed project. What effect will these additional demands have on the existing Greenbelt recycled water system and availability of recycled water for Greenbelt users? 4-10

Additionally, the proposed project is located over the alignment of the existing and future domestic irrigation backup water line for Forest Lawn Memorial-Park. As such, LADWP must coordinate with Forest Lawn regarding the location of the line, construction impacts to the line, and access to the water line. 4-11

We appreciate LADWP's consideration of these comments and respectfully request to be included in the distribution of further notices and information about the Headworks Site Development Project. 4-12

Sincerely,

Dennis Madison
Vice President Environmental Compliance
Forest Lawn Memorial-Parks & Mortuaries

cc: Darin B. Drabing
Susan Rule Sandler
Randy Schwab

5

**Comment Letter 4: Forest Lawn Memorial Parks and Mortuaries**

**Response 4-1**

The commenter provides introductory remarks and states that the Forest Lawn Memorial Park and the Mount Sinai Memorial Park are adjacent to the project site. No further response to this comment is required.

**Response 4-2**

The commenter provides specific measures to minimize impacts during construction and operation of the proposed project to the Forest Lawn cemetery. The commenter requests that construction management plans for the proposed project include advance notice and coordination with Forest Lawn prior to commencement of construction, access for Forest Lawn to construction management to address immediate issues, and 72-hour notice of major impairments to roadways near the Memorial-Parks. As has been done during the construction of the Headworks Water Complex, including the East and West Reservoir and other facilities on the Headworks property, LADWP will appoint a public liaison who will be responsible for addressing public concerns about construction activities, pursuant to Mitigation Measure NOI-4. The public liaison will coordinate with the Memorial Parks as part of the construction process regarding the construction schedule for activities that may impact access or the experience of guests and visitors to Forest Lawn. Additionally, the public liaison will be available to address immediate issues that may arise. In response to this comment, Mitigation Measure NOI-4 has been modified to specify that the public liaison will coordinate with the Memorial Parks (Forest Lawn and Mount Sinai) as part of the construction process. Furthermore, pursuant to Mitigation Measure NOI-5, the public will be notified in advance of the location and dates of construction hours and activities. In response to this comment, Mitigation Measure NOI-5 has been modified to specify that the Memorial Parks will be notified in advance of the location and dates of construction hours and activities. The commenter is referred to Section 2, Errata to the Draft IS/MND, which includes the modifications to the mitigation measures.

Regarding the commenter's request to discuss visual mitigation measures, the Draft IS/MND determined that impacts related to aesthetics would be less than significant. The commenter is referred to Page 19-21 of the Draft IS/MND. Moreover, as Forest Lawn is located at a higher elevation than the project site and size of the project site (Headworks Spreading Grounds is a 43-acre property), it is not feasible to screen machinery and equipment such that there would be no visible construction staging.

The commenter requests that the construction management plans for the proposed project includes no construction on Sundays and holidays. The commenter is referred to Page 10 of the Draft IS/MND, which states that construction activities would typically occur Monday through Friday during the daytime hours, beginning no earlier than 7:00 a.m. and generally ending by 5:00 p.m. No construction work would occur on Sundays or federal holidays, except under emergency conditions.

The commenter requests that funeral procession traffic be prioritized during project construction. Impacts related to traffic congestion and disruption (other than emergency vehicle access and conflicts with emergency evacuation plans) is not a direct consideration under CEQA as determined by the Governor's Office of Planning and Research pursuant to California Senate Bill 743 (2013). As adopted in Section 15064.3 of the CEQA Guidelines, the most appropriate measure of transportation impacts is the vehicle miles traveled (VMT) generated by a project, and

"a project's effect on automobile delay shall not constitute a significant environmental impact." As discussed in Section 3.17 of the IS/MND (Transportation), a VMT analysis for the project was prepared, and the impact was determined to be less than significant. However, as discussed on Page 90 of the Draft IS/MND, based on the projected level of truck trips, which would generally remain at fewer than 10 per day throughout construction, it is not anticipated that project construction would substantially disrupt traffic in the area.

Nonetheless, while traffic congestion is not a CEQA consideration, a traffic control plan for project construction will be prepared by LADWP in coordination with and approved by LADOT as part of the project permitting process. The intent of the traffic control plan is to minimize disruptions to traffic flow during temporary lane closures and ensure safety around work zones. Measures in the traffic control plan can include signage, flag persons, and lane detour plans as necessary to minimize disruptions to traffic. Regarding funeral processions, the California Department of Motor Vehicles (DMV) Laws and Rules of the Road section of the California Driver's Handbook states that drivers must not interfere with funeral processions and that such processions have the right-of-way.[1] Additionally, California Vehicle Code Section 2817 states that any person who disregards any traffic signal or direction given by a peace officer escorting a funeral procession shall be guilty of an infraction and subject to penalties. Similar to existing construction protocols at the project site, vehicles would not exit the property during a funeral procession. Additionally, the traffic control plan will incorporate measures to minimize disruptions to funeral processions consistent with California DMV rules and in accordance with California Vehicle Code Section 2817.

**Response 4-3**

The commenter acknowledges that the Draft IS/MND includes mitigation measures to reduce construction noise, which were determined to be less than significant, and is requesting additional noise-reducing measures to protect cemetery uses.

The commenter requests advance notice and coordination with Forest Lawn to minimize disruption to graveside services and avoid interference with funeral processions. The commenter is referred to Response 4-2 regarding the public liaison and funeral processions.

Additionally, the commenter requests that construction equipment and construction areas be screened with noise-reducing materials. The commenter is referred to Response 4-2. Due to the elevation of Forest Lawn in relation to the project site, the topography of the project site, and the size of the project site, it is infeasible to screen construction activities.

The commenter requests that construction activities be scheduled to avoid simultaneous operation of construction equipment in proximity to Forest Lawn. As shown in Table 3-6, Construction Equipment Noise Levels Without and With Mitigation, on Page 78 of the Draft IS/MND, with implementation of mitigation measures, the maximum construction phase would not exceed the City of Los Angeles Noise Ordinance threshold of 75 dBA at any nearby sensitive receptors, including at the Forest Lawn Cemetery property line and interior.

The commenter requests that equipment staging areas and dumpsters be placed sufficiently distant from Forest Lawn. Aside from hauling of materials, all construction activities would occur within the boundaries of the project site. Due to the nature of the proposed project and the various

[1] State of California Department of Motor Vehicles, California Driver's Handbook, Section 7: Laws and Rules of the Road, available at: https://www.dmv.ca.gov/portal/handbook/california-driver-handbook/laws-and-rules-of-the-road-cont2, accessed August 7, 2024.

project components, the staging areas and dumpsters will not be located in the same area for the duration of construction as they will move once components of the project are completed.

Regarding audio equipment, radios, and outdoor amplified sound systems, LADWP will appoint a public liaison who will coordinate with Forest Lawn and be available to address immediate issues that may arise during project construction.

Regarding truck traffic, the commenter requests that no truck traffic shall enter or exist the project site at the secondary access point at the west end of the site to or from Forest Lawn Drive. As the proposed project has various components, it is necessary to maintain two points access points for trucks into and out of the project site. As discussed in Response 4-2, LADWP will prepare a traffic control plan which will be reviewed and approved by LADOT. The intent of the traffic control plan is to minimize disruptions to traffic flow during temporary lane closures and ensure safety around work zones.

**Response 4-4**

The commenter is concerned about modifications to traffic lanes on Forest Lawn Drive during construction. The commenter is requesting to be included in the review and approval process for the traffic control plan. As stated on Page 90 of the Draft IS/MND, a traffic control plan would be required and approved by the LADOT to maintain the flow of traffic, and there would be no permanent effects to a program, plan, ordinance, or policy related to the intersection modifications. The traffic control plan will address temporary lane closures, and include provisions to maintain access to the cemetery throughout construction. Moreover, as discussed on Page 90 of the Draft IS/MND, based on the projected level of truck trips, which would generally remain at fewer than 10 per day throughout construction, it is not anticipated that project construction would substantially disrupt traffic in the area.

As discussed in Response 4-2, LADWP will appoint a public liaison to coordinate with Forest Lawn as part of the construction process pursuant to Mitigation Measure NOI-4. The public liaison will coordinate with Forest Lawn regarding the construction schedule for activities that may impact access or the experience of guests and visitors to Forest Lawn. Ultimately, LADOT is the reviewing and approving agency for the traffic control plan. The public liaison will provide Forest Lawn with a copy of approved traffic control plan once it is available. As discussed in Response 4-2, to the extent feasible, the traffic control plan will incorporate measures to minimize disruptions to funeral processions.

**Response 4-5**

The commenter is requesting additional information regarding vehicular access to the site during construction and operations, and is specifically concerned about the access point at Forest Lawn Drive and Greenwood Way. For details related to construction, the commenter is referred to Section 1.6, Project Construction, on Page 11 of the Draft IS/MND. As stated, the estimated average daily number of on-site workers would peak at 88 for a 3-month period during the park construction, with several secondary peaks of approximately 55 and 60 workers during the 7-year project construction period. Other than these peak months, the average daily number of workers would remain at or below 40 and often fewer than 20. The estimated average daily number of off-site truck round-trips would peak at approximately 17 for a 3-month period during park construction. During several months, especially during the overlap between the park and WQL construction, the estimated average daily number of truck trips would exceed ten. However, for the remainder of the 7-year project construction period, the average daily truck trips would remain

at or below ten and often fewer than five. As discussed on Page 90 of the Draft IS/MND, based on the projected level of truck trips it is not anticipated that project construction would substantially disrupt traffic in the area. The commenter is referred to Response 4-3 regarding access points during construction. As discussed in Response 4-3, as the proposed project has various components, it is necessary to maintain two points access points for trucks into and out of the project site.

For details related to operation, the commenter is referred to Section 1.7, Project Operation, on Page 12-13 of the Draft IS/MND. As stated, for the proposed WQL, 102 personnel would report to the facility in staggered shifts on weekdays. Over time, it is anticipated that the number of personnel at the WQL would increase to a maximum of 172 over a 10-year period. For the proposed DPR Demonstration Facility, two operators, working on 8-hour shifts, would be present at all times. Facility maintenance personnel would report to the facility during normal weekday hours. A total of approximately five personnel would be present on weekdays. The primary access point for employee, service, and maintenance vehicles would be at the intersection of Forest Lawn Drive at Mt. Sinai Drive. Secondary access for employee, service, and maintenance vehicles would be provided from Forest Lawn Drive at the west end of the HWSG site.

Related to the modifications to the intersection of Forest Lawn Drive and Mt. Sinai Drive, the commenter is referred to Section 1.5.4, Vehicular Access and Traffic, of the Draft IS/MND. As stated, a westbound right-turn and an eastbound left-turn lane would be provided on Forest Lawn Drive, which would be accommodated within the existing road right-of-way. This would require modifications to the existing traffic signal at the intersection of Forest Lawn Drive and Mt. Sinai Drive.

As analyzed in Section 3.17, Transportation, on Page 90-93 of the Draft IS/MND, impacts related to transportation would be less than significant. During construction, a traffic control plan would be required and approved by the LADOT to maintain the flow of traffic. The traffic control plan can include measures including signage, flag persons, and lane detour plans as necessary to minimize disruptions to traffic.

**Response 4-6**

The commenter inquires about the visitors for the DPR Demonstration Facility. As discussed on Page 9 of the Draft IS/MND, the proposed DPR Demonstration Facility would be used for public outreach and education for the City's water reuse projects. As such, a visitor center and a parking lot would be provided. The visitor center would provide a venue for presentations prior to public tours of the AWPF. The AWPF and its support facilities would be approximately 20,000 square feet and the visitor center would be approximately 5,000 square feet, with an additional approximately 16,500 square feet for the parking lot to accommodate staff and visitors. It is anticipated that groups of approximately 20 to 40 people would visit the DPR Demonstration Facility. The DPR Demonstration Facility would be open to the public, but would require advance scheduling for a tour. As stated on Page 13 of the Draft IS/MND, tours would occur about twice weekly on average. The commenter is referred to Section 2, Errata to the Draft IS/MND, which includes revisions related to the anticipated number of visitors to the DPR Demonstration Facility.

**Response 4-7**

The commenter states that more information is required regarding the sufficiency of the parking proposed to be provided as part of the project. It should be noted that parking is not a CEQA environmental issue and is, therefore, impacts related to parking are not included the IS/MND. As

discussed in Chapter 1, Project Description, the proposed WQL would include surface parking for 12 visitor vehicles, 102 staff vehicles, and 20 LADWP fleet vehicles; the visitor center at the DPR Demonstration Facility would include approximately 16,500 square feet for the parking lot to accommodate staff and visitors (approximately 36 spaces); and a surface parking lot would be provided for the Headworks Restoration Park. The parking allotment for each of the project components was determined by based on the needs of each component. No on-street parking on Forest Lawn Drive would be permitted.

**Response 4-8**

The commenter states that potential impacts from additional traffic and parking is needed. The commenter is referred to Response 4-7 regarding parking. As discussed in Response 4-2, vehicle congestion and other vehicle operations related metrics such as level of service (LOS) or delay are no longer a metric suitable for evaluating transportation impacts under CEQA pursuant to Senate Bill 743; therefore, a traffic impact analysis was not included in the IS/MND. CEQA Guidelines section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. VMT represents the amount and distance of automobile travel attributable to a project. An analysis of VMT associated with the proposed project is provided in the discussion in Section 3.17(b), beginning on page 91 of the IS/MND. As discussed in Section 3.17(b), the LADOT Transportation Assessment Guidelines state that public services (e.g., police stations, fire stations, public utilities, public parks) are land uses that do not generally generate substantial VMT. The proposed project includes three components. Two of the components, the DPR Demonstration Facility (a water treatment function) and the Headworks Restoration Park (a public park), are public services that are presumed to have a less than significant VMT impact. Therefore, the DPR Demonstration Facility and the Headworks Restoration Park have been screened out from VMT analysis. The third project component, the WQL, although an LADWP function, would not meet the definition of a public service (i.e., a public utility) since it would serve as a laboratory and administrative facility rather than a traditional water treatment, storage, or conveyance facility. Therefore, the WQL is subject to a VMT analysis.

The proposed WQL would functionally replace the existing LADWP Pasadena and Rinaldi WQL facilities. To evaluate the project VMT, the net VMT was calculated by subtracting the VMT per employee for the Pasadena and Rinaldi facilities from the total VMT for the proposed WQL because the Pasadena and Rinaldi VMT represent the existing condition. The estimated VMT for the proposed WQL is presented in Table 3-13, which indicates that the net change in VMT is 1,051 miles, which results in a VMT of 6.11 miles per employee. The project is located in the Central Area Planning Commission. The Central Area Planning Commission has a VMT Impact Criteria of 7.6 miles per employee, which, as established by LADOT, is 15 percent below the average for the Central Area Planning Commission. As the VMT associated with the proposed WQL would be below this threshold, the project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), and the impact would be less than significant.

**Response 4-9**

The commenters inquires about improvements to Forest Lawn Drive to accommodate additional traffic. The commenter is referred to Response 4-8 regarding transportation impacts associated with the proposed project. As discussed in Section 3.17(c), the proposed project would include modifications to provide a westbound right-turn lane and an eastbound left-turn lane on Forest Lawn Drive at the site entrance opposite Mt. Sinai Drive. Modifications to the existing traffic signal at the intersection would also be required. No other improvements are proposed, other than providing access into the Headworks Spreading Grounds property. The lane and traffic signal

modifications would provide for safe ingress to and egress from the project site and reduce potential conflicts at the intersection on Forest Lawn Drive. All modifications would be completed in accordance with applicable regulations pertaining to roadway safety design.

**Response 4-10**

The commenter inquires what the effect of the additional demands for recycled water for the proposed project would have on the existing Greenbelt recycled water system and the availability of recycled water for Greenbelt system users. The volume of recycled water required to irrigate the project site landscaping, which would be drought-tolerant in the types and use of plant material, is considered minimal and would not affect the water supplies provided to Forest Lawn and other users of the Greenbelt recycled water system.

The recycled water from the Los Angeles-Glendale Water Reclamation Plant (LAGWRP) that would supply the DPR Demonstration Facility would not come from the Greenbelt system supplies, but would be water that is currently discharged directly to the Los Angeles River from LAGWRP. As discussed in Section 3.4(c) of the Draft IS/MND (Page 44), during project operation, an average of approximately 1.38 MGD of tertiary treated wastewater would be diverted from the LAGWRP to the proposed DPR Demonstration Facility, where it would undergo advanced treatment. It has been assumed that the entire 1.38 MGD provided by LAGWRP to the DPR Demonstration Facility would represent a diversion of recycled water that would otherwise be discharged to the Los Angeles River adjacent to LAGWRP. After undergoing advanced treatment, approximately 1.17 MGD of treated effluent from the DPR Demonstration Facility would be discharged to the Los Angeles River adjacent to the HWSG property, while the remaining approximately 0.21 MGD of water processed through the facility would be returned to LAGWRP for treatment. The process losses during tertiary treatment of this returned water at LAGWRP would be approximately 18 percent by volume (approximately 0.04 MG) of sludge byproduct, which would be conveyed in the existing sewer system to Hyperion Water Reclamation Plant in El Segundo. The remaining recycled water (approximately 0.17 MG) would be available for discharge to the Los Angeles River. This entire process would result in a reduction in discharge of 0.04 MGD to the Los Angeles River downstream of LAGWRP, representing a decrease in flow of approximately 0.06 cubic feet per second, resulting in a reduction in depth of approximately 0.1 millimeter or less, depending on the location in the river. This would represent an essentially immeasurable change and is, therefore, considered de minimis, and would not represent a significant impact to the flows in the Los Angeles River.

As requested by the commenter, LADWP would continue to coordinate with Forest Lawn and other Greenbelt system users regarding future recycled water supply and infrastructure.

**Response 4-11**

The commenter states that the proposed project is located over the alignment of the existing and future domestic irrigation backup water line for Forest Lawn Memorial Park and that LADWP must coordinate with Forest Lawn regarding the location of the line, construction impacts, and access to the water line. Similar to all water service provided by LADWP, the Forest Lawn irrigation line would be fully protected during construction of the proposed project such that no interruption of service would occur. Although not anticipated, in the case that the line would be impacted, an alternative supply would be implemented prior to its removal from service to ensure uninterrupted service to Forest Lawn. LADWP would coordinate with Forest Lawn during construction regarding the location of the line relative to the proposed project facilities as well as potential impacts and access to the line.

### Response 4-12

This comment includes closing remarks. No further response to this comment is required.

Comment Letter No. 5

NITHYA RAMAN | Los Angeles City Councilmember 4th District

5/28/2024

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

**RE: Headworks Site Development Project Mitigated Negative Declaration (MND): Council District 4 Comment**

Dear James,

Thank you for the chance to provide comment on the Mitigated Negative Declaration (MND) for the Headworks Site Development Project (the Project). As the Councilmember for the Fourth District of Los Angeles, I have the pleasure of serving as steward of Griffith Park and a large portion of the Los Angeles River. Completing an interconnected off-street trails network alongside the completion of the off-street LA RiverWay active transportation pathway along the entire length of the Los Angeles River is a key goal of mine, and I applaud LADWP incorporating the build-out of the LA RiverWay along the northern edge of the Project site. 5-1

I do want to clarify though, that for the LA RiverWay – and any other walking or biking pathways in the Project site – connections to the rest of the LA RiverWay and to Class II bike lanes on Forest Lawn Drive, Zoo Drive, and thereby to the wider network of routes in and around Griffith Park, should not be provided through the two existing equestrian tunnels which run under SR-134 and Forest Lawn Drive, respectively.

My office introduced CF 23-0722 to direct the Los Angeles Department of Transportation (LADOT) to work with Caltrans to determine the best short, and long-term means of having the LA RiverWay traverse SR-134. We hope that their efforts will tie into the Project in a way to make some of those long-term connections. In the meantime, connections to existing Class II bike lanes on Forest Lawn Drive and Zoo Drive can be made at the Forest Lawn Drive/Zoo Drive intersection as well as along Forest Lawn Drive itself. In any circumstance, the utilization of those existing tunnels for pedestrian or cycling connectivity is not something I support – those two existing tunnels should remain exclusive to equestrian use. 5-2

As such, we seek clarity in the MND whether connections for pedestrian and pedestrian travel would be made through the two existing equestrian tunnels under SR-134 and Forest Lawn Drive, or not. As we read the MND today, there are a few instances of connections between the Project site and the rest of the active transportation network being made through said tunnels, or where it is ambiguous. The citations are in the following sections/pages: Section 3.3(a) p. 30 (pdf p. 37), Section 3.17(b) p. 90 (pdf p. 97), 3.4.3[a](B) p. 43 (pdf p. 167), Section 1.3 p. 3 (pdf p. 412), Appendix C, Historic Property Memorandum p. 2 (pdf p. 473), and Appendix F, Noise and Vibration Impact Study, p. 25 (pdf p.1478).

We hope that these and any other references to the two existing equestrian tunnels under SR-134 and Forest Lawn Drive can make clear that it is not the intention of the Project to connect those tunnels to the pedestrian and cyclist circulation within and outside the Project, as those connections will be made along Forest Lawn Drive, or through separate projects to the west and east of the Project to connect the LA RiverWay directly to the segment which will be built along the Los Angeles River's south bank along the northern edge of the Project site as part of the Project. We look forward to working with LADWP, local stakeholders, and the public to best-design those connections when the time calls for it. 5-3

Sincerely,

**Nithya Raman**
LA City Councilmember, 4th District

200 N Spring St, Suite 415, Los Angeles, CA 90012 | cd4.lacity.org | 213-473-7004 | contactcd4@lacity.org

## Comment Letter 5: Los Angeles City Council District 4

### Response 5-1

The commenter supports the buildout of the LA RiverWay along the northern edge of the project site. This comment includes introductory remarks and does not state a specific concern or questions regarding the adequacy of the environmental impact analysis in the Draft IS/MND. Therefore, no further response to this comment is required.

### Response 5-2

The commenter states that connections from the project site to the LA RiverWay, including walking and biking pathways, should not be provided through the two existing equestrian tunnels under SR-134 and Forest Lawn Drive. The commenter states that connections could be made at Forest Lawn Drive/Zoo Drive intersection and along Forest Lawn Drive itself. As stated on Page 6 of the Draft IS/MND, the HWSG has been identified in the LA River Master Plan as a key location along the river to provide an opportunity for a series of accessible open spaces linked by pedestrian and bicycle pathways along the river's edge. As stated in Section 1.5.3, of the Draft IS/MND, the proposed Headworks Restoration Park would include a series of pedestrian pathways and a bicycle path on the north end of the property. Design and construction of the bicycle path will consider the existing equestrian trail and allow for future connection to the Los Angeles River Trail. As proposed and discussed on Pages 13-14 of the Draft IS/MND, the HWSG segment of the LA River Trail would traverse the property from the secondary access gate on the west, across the northern perimeter, utilizing the transmission line right-of-way adjacent to the river. The trail would connect on the east to Forest Lawn Drive.

The proposed project would not change the existing equestrian trail, nor would it propose walking or biking connections to the equestrian trails beneath SR-134 or Forest Lawn Drive. In response to this comment, Section 1.5.3 of the Draft IS/MND has been revised to clarify that the walking and bicycle pathways would not utilize the existing equestrian trail tunnels. The commenter is referred to Section 2, Errata to the Draft IS/MND, which includes the modifications to the description of the design of the pathways.

### Response 5-3

The commenter seeks clarity on whether the proposed pedestrian connections would be made through the two existing equestrian tunnels under SR-134 and Forest Lawn Drive and provides sections/pages for those clarifications to be made. The commenter is referred to Response 5-2 above regarding the proposed pedestrian connections. As discussed in Response 5-2, the proposed project would not change the existing equestrian trail, nor would it propose walking or biking connections to the equestrian trails beneath SR-134 or Forest Lawn Drive. In response to this comment, Section 3.3 and Section 3.17 of the Draft IS/MND have been revised to clarify that the walking and bicycle pathways would not utilize the existing equestrian trail tunnels. The commenter is referred to Section 2, Errata to the Draft IS/MND which includes the modifications to the description of the design of the pathways.

Regarding clarifications in the technical appendices (i.e., Section 3.4.3. of the Air Quality Impact Study, Section 1.3 of the Biological Resources Assessment, page 2 of the Cultural Resources Technical Memorandum, and page 25 of the Noise and Vibration Impact Study), the text has been modified in the final versions of the appendices to reflect that no changes to access by pedestrians or bicycles through the to the existing equestrian tunnels would occur.

Comment Letter No. 6



June 24, 2024

James R. Howe
Environmental Planning and Assessment
Los Angeles Department of Water and Power
111 N. Hope St., Room 1044
Los Angeles, CA 90012

**HEADWORKS SITE DEVELOPMENT PROJECT: CITY OF LOS ANGELES DEPARTMENT OF RECREATION AND PARKS COMMENTS TO THE IS/MND**

The Initial Study Mitigated Negative Declaration (IS/MND) for the Headworks Site Development Project was delivered to the Department of Recreation and Parks (RAP) on May 31, 2024. RAP staff has completed its review and found that some areas that need to be revised. 6-1

Staff finds that the project description lacks detail on the plants that will be planted in the Headworks Park and whether the parking lot for the park will be equipped with EV chargers. It should be clear that the plant palette of the new park should be discussed and agreed upon with RAP and that the proposed park parking lot should include EV chargers. 6-2

Regarding the Biological Resources section of the IS/MND, please note that the trees currently present on the site are located on RAP's property. According to City Charter, any tree removal and replacement should occur in agreement with RAP and according to RAP's tree replacement policy, not according to Street Service's policy as described on page 38, 44 and 45 of the IS/MND. If protected trees removal and replacement is required the Board of Recreation and Parks Commissioners (Board), not the Board of Public Works, will need to review and consider such requests. 6-3

Staff review also found a few material errors. On page 14 the IS/MND lists the Department of Cultural Affairs' Board as one of the entities that should authorize the project. As the proposed Project is located on RAP owned property, RAP should be listed as one of the agencies that should review the design of the Project. 6-4

221 N. FIGUEROA STREET, SUITE 350, LOS ANGELES CA 90012 — www.LAPARKS.ORG

Comment Letter No. 6 Continued



On page 30, in the Conclusions of the Air Quality Section, please note that this section omits to mention that the Los Angeles Air Basin is in non-attainment for Lead National Air Quality Standards. 6-5

Thank you for giving RAP the opportunity to comment. For any further questions regarding this, please contact Elena Maggioni, of my staff, at (213) 482-6980.

Sincerely,

JIMMY KIM
General Manager

DARRYL FORD
Superintendent
Planning, Maintenance and Construction Branch

DF/EM:ar

cc: Darryl Ford, Superintendent, Dept. of RAP

## Comment Letter 6: City of Los Angeles Department of Recreation and Parks

### Response 6-1

This comment includes introductory remarks. No further response to this comment is required.

### Response 6-2

The commenter states that the plant palette for the park should be discussed with the Department of Recreation and Parks (RAP) and the parking lot should include EV chargers. Regarding the plant palette, LADWP is currently in the process of designing the park, which will include a detailed landscaping plan. LADWP will provide RAP with the preliminary landscape plan for review and comment when it becomes available. Regarding EV chargers, LADWP will coordinate with RAP related to the required provision of EV chargers that would be included in the final design for the project.

### Response 6-3

The commenter states that removal and replacement of trees within the project site would be required to be reviewed by RAP instead of the Board of Public Works. According to Chapter 5, Tree Removal, Replacement, and Planting of the RAP's Urban Forest Program (Revised October 2004), trees protected by LA City ordinances must always have a permit and an approval by the Board of Public Works before any alteration to the trees is made. Trees that are considered "Heritage Trees", "Special Habitat Value Trees", and "Common Park Trees" must follow RAP's removal procedure and removal is not permitted without approval. As discussed in Section 3.4, Biological Resources, of the Draft IS/MND, trees established along the southern perimeter of the HWSG property are a mix of native and non-native species. Coast live oak, western sycamore, toyon, and blue elderberry were identified within these stands along the southern perimeter. A limited number of these trees and shrubs may be impacted at the proposed primary entry to the project site at Mt. Sinai Drive and Forest Lawn Drive and south of the proposed DPR Demonstration Facility. As these trees are considered protected under the City of LA ordinances, removal of these trees must be permitted and approved by the Board of Public Works. For other trees that may be impacted by the proposed project within the project site, LADWP would be required to coordinate with and obtain approval from RAP, as indicated by the commenter. In response to this comment, Section 1.8, Required Permits and Approvals, and Section 3.4, Biological Resources, has been revised to reference RAP as an approving agency for tree removal. The commenter is referred to Section 2, Errata to the Draft IS/MND.

### Response 6-4

The commenter requests that RAP be listed as an agency that should review the design of the project. In response to this comment, Section 1.8, Required Permits and Approvals, has been revised to include RAP as an agency that would provide design review and approval. The commenter is referred to Section 2, Errata to the Draft IS/MND.

### Response 6-5

The commenter states that the Los Angeles Air Basin is in non-attainment for Lead National Air Quality Standards. As discussed on Page 30 of the Draft IS/MND, the Los Angeles County portion of the Air Basin is presently designated as nonattainment under either the federal or state ambient air quality standards for $O_3$, $PM_{10}$, and $PM_{2.5}$. Lead is designated as partial non-attainment, but an

attainment redesignation request is pending. In response to this comment, Section 3.3, Air Quality, has been revised to include this designation for lead. The commenter is referred to Section 2, Errata to the Draft IS/MND.

# APPENDIX A
# MITIGATION MONITORING AND REPORTING PROGRAM

# MITIGATION MONITORING AND REPORTING PROGRAM

**Headworks Site Development Project**
**Mitigated Negative Declaration**
**State Clearinghouse No. 2024041114**

## Introduction

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to the California Environmental Quality Act (CEQA) and the State CEQA Guidelines to provide for monitoring of the mitigation measures required by certification of the Headworks Site Development Project (proposed project) Mitigated Negative Declaration (MND). Section 21081.6 of the Public Resources Code and Section 15091(d) of the CEQA Guidelines require public agencies to "adopt a reporting or monitoring program for changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment." The lead agency must define specific reporting and/or monitoring requirements to be enforced during project implementation prior to final approval of the proposed project.

The Los Angeles Department of Water and Power (LADWP) is the lead agency for the proposed project and is responsible for administering and implementing the MMRP. The MMRP stipulates how all required mitigation measures are to be implemented and completed during the appropriate project phase. It also facilitates documentation necessary to verify that mitigation measures were in fact properly implemented.

## Mitigation Monitoring and Reporting Program Procedures

This MMRP gives LADWP the primary responsibility for taking all actions necessary to implement the mitigation measures according to the specifications provided for each measure and for demonstrating that the action has been successfully completed. LADWP's designated environmental monitor will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to remedy problems. LADWP, at its discretion, may delegate responsibility for measure implementation and monitoring, or portions thereof, to other responsible individuals, such as a licensed contractor. Specific responsibilities for LADWP include:

- Coordination of all mitigation monitoring activities
- Management of the preparation, approval, and filing of monitoring or permit compliance reports
- Maintenance of records concerning the status of all approved mitigation measures
- Quality control assurance of field monitoring personnel
- Coordination with other agencies regarding compliance with mitigation or permit requirements
- Reviewing and recommending acceptance and certification of implementation documentation
- Acting as a contact for interested parties or surrounding property owners who wish to register complaints, observations of unsafe conditions, or environmental violations; verifying any such circumstances; and developing any necessary corrective actions

### Resolution of Noncompliance Complaints

Any person or agency may file a complaint regarding noncompliance with the mitigation measures addressed in the MMRP. The complaint shall be directed to LADWP (111 North Hope Street, Room 1044, Los Angeles, CA 90012) in written form providing detailed information on the purported violation. LADWP will investigate any complaints filed to determine the validity of the complaint. If noncompliance with a mitigation measure is verified, LADWP will take the necessary action(s) to remedy the violation. The complainant will receive written confirmation indicating the results of the investigation or the final corrective action that was implemented in response to the specific noncompliance issue.

### Mitigation Monitoring and Reporting Program Matrix

The MMRP is organized in a matrix format. The first column identifies the mitigation measure number. The second column identifies the mitigation measure. The third column, entitled “Time Frame for Implementation,” refers to when monitoring will occur. The timing for implementing mitigation measures and the definition of the approval process has been provided to assist LADWP staff to plan for monitoring activities. The fourth column, entitled “Responsible Monitoring Agency,” refers to the agency responsible for ensuring that the mitigation measure is implemented. The fifth column, entitled “Verification of Compliance,” has subcolumns for initials, date, and remarks. This last column will be used by the lead agency to document the person who verified that the mitigation measure was satisfactorily implemented, the date on which this verification occurred, and any other remarks. The mitigation measures in the matrix are presented by environmental issue area.

**Mitigation Monitoring and Reporting Program**
**State Clearinghouse No. 2024041114**

**Headworks Site Development Project**
**Mitigated Negative Declaration**

**Mitigation Measures (MM) and Best Management Practices (BMP)**

| Number | Mitigation Measure/Best Management Practice | Time Frame for Implementation | Responsible Monitoring Agency | Verification of Compliance | | |
|---|---|---|---|---|---|---|
| | | | | Initials | Date | Remarks |
| **BIOLOGICAL RESOURCES** | | | | | | |
| **BMP-1** | Nesting Bird Surveys: Construction should, if possible, occur outside of the nesting bird season (generally February 15 through September 15, and as early as January for raptors). If construction outside this time period is not feasible, the following measures should be employed to avoid and minimize impacts to nesting birds protected under the MBTA and CFGC:<br>1. A pre-construction nesting bird survey should be conducted by a qualified biologist within 3 days (72 hours) prior to the start of project construction to determine whether active nests are present within or directly adjacent to the construction zones. Following completion of the survey, a memo report should be prepared to document the location of all nests found (if any), their status (i.e., eggs or hatchlings present), existing biological conditions of the project area, and the bird species detected during the survey. If an active nest is found, recommendations to avoid and minimize impacts to the nest, such as those presented below, should be included as appropriate.<br>2. A no-work (or reduced work) buffer shall be established around any active passerine | Prior to and During Construction | LADWP | | | |

| Number | Mitigation Measure/Best Management Practice | Time Frame for Implementation | Responsible Monitoring Agency | Verification of Compliance | | |
|---|---|---|---|---|---|---|
| | | | | Initials | Date | Remarks |
| | bird nest or raptor nest. The qualified biologist should monitor the nest on a weekly basis, and project activities within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor shall be evaluated for potential impacts to the active nest. Monitoring should occur until the nest is no longer active. The buffers may be adjusted (including increases or reductions to the buffer) by the qualified biologist on a case-by-case basis taking into consideration the location, type, duration and timing, and severity of work, distance of nest from construction activities, surrounding vegetation and line-of-sight between the nest and work areas, and the species' site-specific level of habituation to the disturbance. If the qualified biologist determines nesting activities may fail as a result of project activities, the biologist should immediately inform the resident engineer and construction supervisor, and all project activities shall cease within the recommended no-disturbance buffer until the biologist determines the adults and young are no longer reliant on the nest site.<br>3. Avoidance buffers around active nests should be delineated on site with bright flagging or other means, for easy identification by construction personnel. The resident engineer and construction supervisor will be notified of the nest and the buffer limits to ensure it is maintained. | | | | | |

| Number | Mitigation Measure/Best Management Practice | Time Frame for Implementation | Responsible Monitoring Agency | Verification of Compliance | | |
|---|---|---|---|---|---|---|
| | | | | Initials | Date | Remarks |
| **MM-BIO-1** | Roosting Bat Surveys: No less than 60 days prior to initiating project activities, a qualified bat biologist shall conduct a bat roosting habitat suitability assessment of any vegetation that may be removed, altered, or indirectly impacted by the project activities. Any locations identified as having potentially suitable bat roosting habitat by the qualified bat biologist shall be subject to additional nighttime surveys (bat surveys) during the summer months (i.e., June-August) to determine the numbers and bat species using the roost(s). The information collected during these additional bat surveys shall be used by the qualified bat biologist to develop species-specific measures to minimize impacts to roosting bats should bats be detected using the site. The bat surveys shall be conducted by the qualified bat biologist using an appropriate combination of visual inspection, sampling, exit counts, and acoustic surveys.<br><br>If the presence of bats within the project site is confirmed, avoidance and minimization measures, including the designation of buffers based upon the particular bat species found and phased removal of trees shall be developed and implemented. | Prior to and During construction | LADWP | | | |
| **CULTURAL RESOURCES** | | | | | | |
| **BMP-2** | All field supervisors and construction workers shall participate in cultural resources awareness training prior to the initiation of project construction activities that involve ground-disturbance. The training shall include a description of the types of cultural resources (including tribal cultural resources and human remains) that could inadvertently be encountered during ground-disturbing activities, the sensitivity of the resources, the legal basis for protection of the resources, and the penalties for unauthorized collection of or knowingly damaging | Prior to and During construction | LADWP | | | |

| Number | Mitigation Measure/Best Management Practice | Time Frame for Implementation | Responsible Monitoring Agency | Verification of Compliance | | |
|---|---|---|---|---|---|---|
| | | | | Initials | Date | Remarks |
| | the resources. The training shall address the proper procedures in the event of an inadvertent discovery of a cultural resource, including the immediate halting of work in the area of the discovery, notification of appropriate individuals of the discovery, the establishment of appropriate protective buffer zones around the discovery, and the continued avoidance of the protected area until the resource has been evaluated by qualified individuals and an appropriate treatment plan has been developed and implemented. These procedures shall be documented in a cultural resources monitoring plan (CRMP) that shall establish, in the event of an inadvertent discovery of cultural resources, monitoring procedures (including applicable archaeological and/or tribal monitors), notification procedures, key staff, and preliminary treatment measures for potential discoveries. The CRMP shall be written to ensure compliance with appropriate state and federal laws. The training presentation and CRMP shall be available to additional supervisory or construction personnel who may join after project construction has begun. | | | | | |
| **NOISE** | | | | | | |
| **MM-NOI-1** | Construction equipment shall be properly maintained and equipped with mufflers to manufacturer specifications. | During Construction | LADWP | | | |
| **MM-NOI-2** | Rubber-tired equipment shall be used rather than tracked equipment when feasible. | During Construction | LADWP | | | |
| **MM-NOI-3** | Equipment shall be turned off when not in use for an excess of five minutes, except for equipment that requires idling to maintain performance. | During Construction | LADWP | | | |

| Number | Mitigation Measure/Best Management Practice | Time Frame for Implementation | Responsible Monitoring Agency | Verification of Compliance | | |
|---|---|---|---|---|---|---|
| | | | | Initials | Date | Remarks |
| **MM-NOI-4** | A public liaison shall be appointed for project construction and will be responsible for addressing public concerns about construction activities, including excessive noise. 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. | During Construction | LADWP | | | |
| **MM-NOI-5** | The public shall be notified in advance of the location and dates of construction hours and activities. | Prior to and During Construction | LADWP | | | |
| **TRIBAL CULTURAL RESOURCES** | | | | | | |
| **MM-TCR-1** | LADWP shall retain a tribal monitor prior to the commencement of ground-disturbing activities at the project site. The tribal monitor shall be retained from a consulting tribe that is ancestrally affiliated with the project area and qualified by their tribe to monitor tribal cultural resources. The tribal monitor will be present on-site during ground-disturbing activities during project construction. "Ground-disturbing activity" shall include demolition, pavement removal, potholing, auguring, grubbing, boring, grading, excavation, drilling, and trenching. Monitoring needs shall be routinely evaluated throughout ground disturbance activities to determine whether additional monitoring is warranted; for instance, the monitoring program may be concluded if previous site fill material is determined to have come from an imported source, monitoring efforts have not yielded finds, or mutual consensus is reached between LADWP and consulting tribes to conclude the program.<br>Before initial ground-disturbing activities, and any time new personnel is hired at the project site, the tribal monitor shall conduct a brief awareness training session for the benefit of all construction workers, supervisory personnel, and/or the new | Prior to and During Construction | LADWP | | | |

| Number | Mitigation Measure/Best Management Practice | Time Frame for Implementation | Responsible Monitoring Agency | Verification of Compliance | | |
|---|---|---|---|---|---|---|
| | | | | Initials | Date | Remarks |
| | hire. The training, which could be held in conjunction with the project's initial on-site safety meeting, shall explain the importance of, and legal basis for, the protection of significant tribal cultural resources. Each worker shall be notified of the proper procedures to follow in the event that tribal cultural resources or human remains are uncovered during ground-disturbing activities.<br><br>The tribal monitor shall complete daily monitoring logs that will be provided to LADWP and held in confidentiality; however, the logs shall be made available for inspection by all consulting tribes.<br><br>In the event that previously unknown resources are encountered during construction activities, the proposed project shall be subject to California PRC Section 21083.2(i) regarding provisions related to the accidental discovery of archaeological resources. Work shall be temporarily halted in the vicinity of the find, and LADWP shall retain a qualified professional archaeologist meeting the Secretary of the Interior Professional Qualifications Standards for archaeology to evaluate the significance of the find and determine appropriate treatment for the resource in accordance with provisions of CEQA Guidelines Section 15064.5, the National Historic Preservation Act, 36 CFR Section 800.6 (Resolution of adverse effects), and Section 800.13 (Post-review discoveries). Upon discovery of any archaeological resources, construction activities in the immediate vicinity of the find (i.e., not less than the surrounding 60 feet) shall cease until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by a qualified archaeologist and the on-site tribal | | | | | |

| Number | Mitigation Measure/Best Management Practice | Time Frame for Implementation | Responsible Monitoring Agency | Verification of Compliance | | |
|---|---|---|---|---|---|---|
| | | | | Initials | Date | Remarks |
| | monitor. If the resources are determined to be Native American in origin, all consulting tribes shall be notified and be provided information regarding the nature of the find, and interested tribes shall coordinate with LADWP regarding significance, treatment, and final disposition of these resources.<br><br>The input of all consulting tribes shall be taken into account in the preparation of any required treatment plan for the resources. Work in the area of the discovery may not resume until evaluation and treatment of the resource is completed and/or the resource is recovered and removed from the site. Construction activities may continue on other parts of the construction site while evaluation and treatment of the resource takes place. | | | | | |