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January 22, 2014

Ms. Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

Subject: Responses to Comments on the Initial Study/Mitigated Negative Declaration
for the Griffith Park South Water Recycling Project

Thank you for your comments (Letter No. 4, enclosed) on the Initial Study/Mitigated Negative Declaration (IS/MND) for the Griffith Park South Water Recycling Project (Project). Your comments and a response to your comments are provided as follows:

Response 4-A

This comment states the statement located both on the page preceding the Table of Contents and on page 2 of the Draft MND that identifies Griffith Park as owned and operated by the City of Los Angeles Department of Recreation and Parks (RAP) is incorrect. There is an INDENTURE on the property; clear title ownership does not exist.

Thank you for your comments. The City of Los Angeles owns Griffith Park. The RAP has jurisdiction by City Charter because it is dedicated parkland.

Response 4-B

This comment states that in regard to Section 1.2.1, *Project Background*, recycled water for the golf course is 310 acre feet per year (AFY) and for future customers at 60 AFY totaling 390 AFY. The capacity of this Project is then 390 AFY.

Thank you for your comments. Section 1.2.1, *Project Background*, identifies the golf course could require approximately 310 AFY of recycled water for irrigation. In addition to providing 310 AFY of recycled water for irrigation to the golf course, the proposed Project would increase storage capacity to accommodate future expansion of the recycled water system to other areas of Griffith Park and the Los Feliz area. The Draft MND analyzed impacts associated with infrastructure required to supply 310 AFY to the golf course and a larger recycled water tank to ensure any future improvements do not

require additional capacity of this tank. Future improvements to provide recycled water to other areas of Griffith Park and the Los Feliz area, including the Greek Theatre; landscaped medians within Vermont Avenue and Hillhurst Avenue; the Griffith Park Nursery and Horticultural Center; picnic areas in the immediate vicinity; and the bird sanctuary, are not yet identified and may require additional environmental review should additional infrastructure be required.

Response 4-C

This comment states that in regard to Section 1.2.1, *Project Background*; the environmental effects associated with the expansion, which is anticipated to serve more than Griffith Park including landscaped medians in Los Feliz, are not fully addressed.

Thank you for your comments. Refer to response to comment 4-B.

Response 4-D

This comment states that in Section 1.2.1, *Project Background*, the impacts of the expansion on the health of wildlife, including migratory birds, are not clear.

Thank you for your comments. Impacts to wildlife species were identified and discussed in Section 2.4, *Biological Resources*, of this Final MND. In addition, a *Biological Resource Technical Report* was prepared for the proposed Project and can be found in Appendix A of this document. Three native plant communities are found within the limits of the Project site: Southern California black walnut woodland, undifferentiated chaparral scrub, and coast live oak woodland (Figure 4). Wildlife species observed or expected to occur on the Project site are typical for the coastal range foothills. Several common wildlife species have been recorded on the Project site, while the coast horned lizard; silvery legless lizard; coastal whiptail; western mastiff bat; and the silver haired bat are special-status species with a moderate or greater potential to occur within the Project site. Rare and special-status plants have been recorded in the region of the Project site and have a potential to be present as detailed in Section 2.5, *Biological Resources*. Implementation of *Mitigation Measures* BIO-1 through BIO-5 would reduce potential impacts to native plant communities, wildlife species, rare and special-status plants during construction activities to less than significant levels.

Response 4-E

This comment states letter f) of Section 2.4, *Biological Resources*, of the Draft MND does not state the effect on any long-term migration of local wildlife and pollination of

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local vegetation. The Draft MND also does not state the effect on the disruption of natural resources and trails.

Thank you for your comments. Refer to response to comment 4-D. The proposed Project includes the use of Horizontal Directional Drilling (HDD) at Fern Canyon Nature Trailhead to reduce impacts to trail users.

Response 4-F

This comment states that letter c) of Section 2.10, *Land Use and Planning*, of the Draft MND fails to list the Best Management Practices (BMPs) that are referred to in the paragraph. Letter a) of Section 2.4, *Biological Resources*, fails to list how the effects on wildlife nesting and procreation will be avoided.

Section 2.10, *Land Use and Planning*, refers to the BMPs listed in the Griffith Park Wildlife Management Plan. The Griffith Park Wildlife Management Plan describes the major vegetation communities that comprise the different wildlife habitats in Griffith Park. It also recommends management practices specific to each habitat type. Many management practices are applicable to multiple habitat types. Many animal species' multiple habitat requirements and the suite of species found in any given habitat type is influenced by the adjoining habitat. Please refer to the Griffith Park Wildlife Management Plan for more details.

Response 4-G

The comment states that in regard to the various mitigation measures listed in letter a) of Section 2.18, *Mandatory Findings of Significance*, it is unclear as to whether experienced and qualified personnel will be onsite to implement these measures. Cumulative impacts to future projects omit the recycled water expansion of this document.

Thank you for your comments. The *Mitigation Measures* BIO-1 through BIO-5 generally identify the work to be conducted by a qualified arborist, wildlife biologist, and botanist to ensure the appropriate qualified personnel are on-site. In addition, *Mitigation Measures* CUL-1 through CUL-6 similarly identifies the need for the appropriately qualified person to conduct the work.

Adoption of the MND and consideration of the proposed Project by the City of Los Angeles Board of Water and Power Commissioners (Board) is tentatively scheduled for March 4, 2014 at 11:00 a.m. The meeting location is:

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

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

Sincerely,

A handwritten signature in blue ink that reads "Nadia J Parker for". The signature is written in a cursive style.

Charles C. Holloway
Manager of Environmental Planning and Assessment

IP:mg
Enclosure
c/enc: Ms. Irene Y. Paul

From: Joyce Dillard
Sent: Monday, December 02, 2013 3:23 PM
To: Paul, Irene
Subject: Comments to LADWP Griffith Park South Water Recycling Project due 12.2.2013

You state:

Griffith Park is owned and operated by the City of Los Angeles Department of Recreation and Parks (LARAP) and is located at 4730 Crystal Springs Drive.

A

Comments:

There is an INDENTURE on the property; clear title ownership does not exist.

You state:

The proposed project would expand the existing water recycling system supplied by the Los Angeles-Glendale Water Reclamation Plant by extending the Greenbelt Water Recycling distribution line south to serve the Roosevelt Golf Course as its prime customer. The Roosevelt Golf Course currently uses potable water for irrigation. It is anticipated the golf course could require approximately 310 acre feet per year (AFY) of recycled water for irrigation.

B

In addition, the proposed project would increase recycled water storage to accommodate future expansion of the recycled water system to other areas of Griffith Park and the Los Feliz area, including the Greek Theatre, landscaped medians within Vermont Avenue and Hillhurst Avenue the Griffith Park Nursery and Horticultural Center, picnic areas in the immediate vicinity, and the bird sanctuary. The proposed project would expand storage for future customers by an average of 60 AFY of recycled water.

Comments:

Recycled water for the golf course is 310 AFY and for future customers at 60 AFY totaling 390 AFY. The capacity of this project is then 390 AFY.

An expansion is anticipated to serve more than Griffith Park including landscaped medians in Los Feliz, yet that expansion is not addressed further. The environmental impacts are not reflected on this expansion.

C

It is not clear the impacts on the wildlife including migratory birds and any effects on health and disease.

D

You state:

However, the project area is located within the Griffith Park Significant Ecological Area (SEA) as defined by the County of Los Angeles. The SEA is described as an extensive, relatively undisturbed island of natural vegetation

E

Comment Letter 4

in an urbanized, metropolitan area. The SEA supports the coastal sage scrub, chaparral, riparian, and southern oak woodland plant communities typical for the interior mountain ranges of Southern California.

and

As a result of the study, two historical resources were identified within the project area: Griffith Park (P-19-175297) and Vista Del Valle Drive.

Comments:

Since the park will be affected, you do not state the effect on disruption on natural resources and trails including grizzly footprints (area extinct) any long-term migration or pollination of effected wildlife, birds and plant and tree species.

You state:

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

and

6.4.1 Loss of Habitat

Direct impacts as a result of construction activities associated with the proposed Project would include the permanent removal and temporary disturbance of native vegetation that is utilized by both common and rare wildlife, and increased noise levels due to equipment operations occurring in these areas. Indirect impacts to habitat could include alterations to hydrological regimes such as runoff and percolation, increased erosion and sediment transport, and the introduction of nonnative and invasive weeds.

Comments:

You fail to list the BMPs and how the effects on wildlife nesting and procreation will be avoided.

You state:

18. MANDATORY FINDINGS OF SIGNIFICANCE —

Would the project:

a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Less than Significant with Mitigation.

*The proposed project would have the potential to impact sensitive wildlife species and natural communities during construction activities. However, with the incorporation of **Mitigation Measures BIO-1 through BIO-5**, potential impacts to biological resources would be reduced to less than significant levels.*

*The project would involve excavation and grading activities which could potentially unearth prehistoric archaeological resources. Such actions could unearth, expose, or disturb subsurface paleontological, archaeological, historical, or Native American resources that were not observable on the surface. However, with the incorporation of **Mitigation Measures CUL-1 through CUL-6**, potential impacts to paleontological or cultural resources that represent major periods of California history or prehistory would be reduced to less than significant levels*

b) Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact.

A cumulative impact could occur if the project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. Because the project impacts are generally construction related, the cumulative study area is generally confined to the areas adjacent to the project site, which include open spaces, residential areas, and Griffith Park. There are several past, present, and reasonably foreseeable projects identified in the Griffith Park area that are listed in Table 4.

Comments:

Mitigation Measures listed are:

- BIO-1: Worker Environmental Awareness Program
- BIO-2: Habitat Revegetation.
- BIO-2: Special-status Wildlife
- BIO-3: Special-Status Plants.
- BIO-4: Protected Trees
- BIO-5: Nesting Birds
- CUL-1: Pre-Construction Training.
- CUL-2: Inadvertent Discoveries.
- CUL-3: Preparation of Paleontological Resource Monitoring and Mitigation Plan and Pre-Construction Training
- CUL-4: Paleontological Monitoring
- CUL-5: Inadvertent Discoveries
- CUL-6: If human remains are encountered,

It is unclear if experienced and qualified personnel will be onsite in order to interpret, determine and employ the Mitigation Measures considering Mandatory Findings of Significance were declared. Cumulative Impacts to Future Projects omit the recycled water expansion in this document.

Joyce Dillard
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Los Angeles, CA 90031

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