Final Initial Study/Mitigated Negative Declaration

Brockman Landfill Remediation Project

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

November 2018

CEQA Final Initial Study and Mitigated Negative Declaration

Brockman Landfill Remediation Project

November 2018

General Manager
David H. Wright

Senior Assistant General Manager
Water Systems
Richard F. Harasick

Director of Environmental Affairs
Mark J. Sedlacek

Manager of Environmental Affairs
Charles C. Holloway

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

Technical Assistance Provided by
AECOM
300 South Grand Avenue, 8th Floor
Los Angeles, CA 90071

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Acronyms and Abbreviations

APCD	Air Pollution Control District
ASTM	American Society for Testing and Materials
BMP	Best Management Practice
CalEEMod	California Emissions Estimator Model
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFGC	California Fish and Game Code
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CH_4	methane
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CWA	Clean Water Act
dB	decibel
dBA	A-weighted scale
DTSC	California Department of Toxic Substances Control
GHG	greenhouse gas
HCP	Habitat Conservation Plan
LADWP	Los Angeles Department of Water and Power
LEA	Local Enforcement Agency
Leq	Equivalent Noise Level
MBTA	Migratory Bird Treaty Act
MND	Mitigated Negative Declaration
$MTCO_2e$	metric tons of CO_2e
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NO_X	nitrogen oxides
NR	Natural Resources
OS	open space
O_3	ozone
$PM_{2.5}$	particulate matter less than two and a half microns in diameter
PM_{10}	particulate matter less than 10 microns in diameters
Porter-Cologne	Porter-Cologne Water Quality Control Act
RWQCB	Regional Water Quality Control Board
SCAQMD	South Coast Air Quality Management District
SMAQMD	Sacramento Metropolitan Air Quality Management District
SWIS	Solid Waste Information System
SWPPP	Storm Water Pollution Prevention Plan
SO_X	sulfur oxides
US 395	United States Route 395
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
VOC	volatile organic compounds

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SECTION 1
PROJECT DESCRIPTION

1.1 Overview of the Project

The Los Angeles Department of Water and Power (LADWP) proposes to conduct remediation activities for the Brockman Lane Disposal Site (project site) to reduce immediate and long-term risk to the community from exposure to wastes in compliance with Division 30 of the PRC [Public Resource Code], Title 27, California Code of Regulations (27 CCR), and Title 14, California Code of Regulations (14 CCR), in coordination with the California Department of Resources Recycling and Recovery (CalRecycle). The Brockman Landfill Remediation Project (proposed project) would include screening, recycling, and reconsolidating surface and near surface debris within the project area, as well as securing and restricting access to the site.

1.2 California Environmental Quality Act

The California Environmental Quality Act (CEQA) applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The proposed project constitutes a project as defined by CEQA (California Public Resources Code Section 21000 et seq.). The CEQA Guidelines Section 15367 states that a "Lead Agency" is "the public agency which has the principal responsibility for carrying out or approving a project." Therefore, LADWP is the lead agency responsible for compliance with CEQA for the proposed project.

As the lead agency for the proposed project, LADWP must complete an environmental review to determine if implementation of the proposed project would result in significant adverse environmental impacts. To fulfill the purpose of CEQA, an Initial Study has been prepared to assist in making that determination. Based on the nature and scope of the proposed project and the evaluation contained in the Initial Study environmental checklist (contained herein), LADWP, as the lead agency, has concluded that a Mitigated Negative Declaration (MND) is the proper level of environmental documentation for this project. The Initial Study shows that impacts caused by the proposed project are either less than significant or significant but mitigable with incorporation of appropriate mitigation measures as defined herein. This conclusion is supported by CEQA Guidelines Section 15070, which states that an MND can be prepared when "(a) the initial study shows that there is not substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or (b) the initial study identifies potentially significant effects, but (1) revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and (2) there is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment."

1.3 Project Location and Setting

As shown on Figure 1, the project site is located within the northern portion of Inyo County in an area approximately 4,300 feet in elevation. The LADWP-owned Brockman Lane Disposal

Site (CalRecycle Solid Waste Information System [SWIS] Facility File Number 14-CR-0009) is located north of the intersection of Riverside Road and Brockman Lane, just northeast of Bishop, California, as shown on Figure 2. The project site occupies approximately 33.5 acres of open land that forms a portion of the southern edge of the Owens River Valley. The project site contains a landfill characterized by a series of parallel, north-south oriented soil berms that rise approximately five to ten feet above the adjacent ground surface. In the southern half of the project site, the ground surface between these berms is relatively flat or gently sloping to the north. In the northern half of the project site, the ground surface slopes to the north forming a ridge overlooking the Owens River. The ground is covered with sparse vegetation, litter, debris, and solid waste. Landfilled waste is exposed on north-facing slopes in the northeastern quadrant of the project site. A three-strand, barbed wire fence borders three sides of the project site; however, the access to the site is currently unrestricted. Figure 3 shows the existing project site plan.

Field observations estimate that approximately 50,000 cubic yards of surface/near surface waste covers an area of approximately 112,500 square feet with buried wastes up to 15 feet thick. Samples of soils collected at the project site were analyzed for metals and leachable concentrations of chemical compounds. Some of the soil samples detected lead concentrations that exceeded the human health risk screening levels as defined by the State of California Office of Environmental Health Hazard Assessment and U.S. Environmental Protection Agency. These findings suggest that the site poses a potential risk to human health and the environment. As such, site remediation is recommended to reduce potential health risks.

The project site is surrounded by sparsely vegetated vacant or undeveloped lands. The nearest land use includes single-family residences located approximately 0.7 miles southeast of the project site in the City of Bishop. In addition, Bishop Creek travels generally in a north-south orientation located approximately 0.3 miles east of the project site.

1.4 Project Objectives

The primary objectives of the proposed project are to:

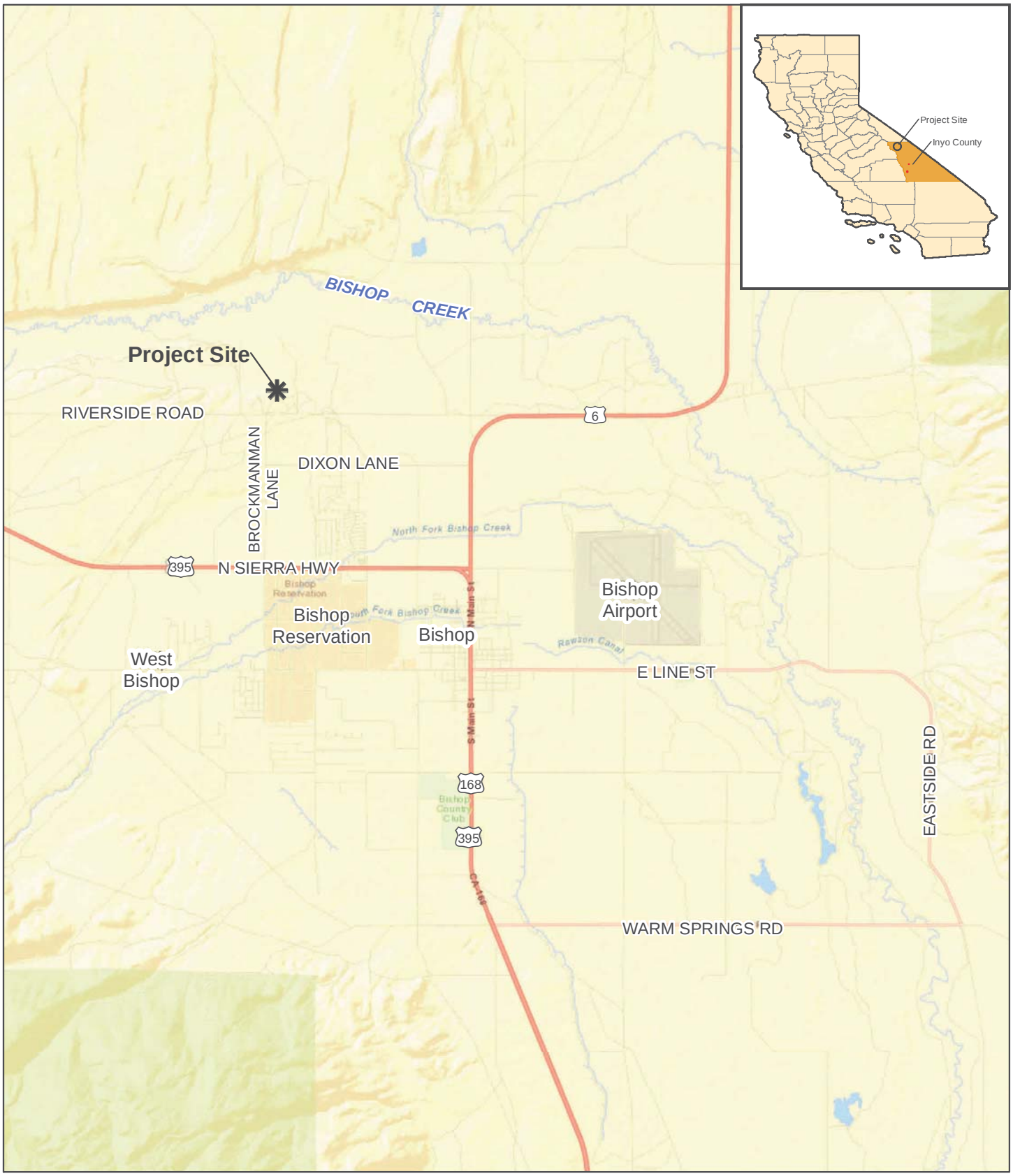
- Help reduce existing and future exposure risks to public health;
- Minimize the potential for future illegal waste disposal at the project site; and
- Stabilize existing wastes and comply with concerns expressed by CalRecycle in a May 15, 2015 letter issued to the local enforcement agency (LEA), the County of Inyo Department of Environmental Health and Human Services citing necessary procedures for site maintenance, grading of fill surfaces, drainage and erosion control, litter control, and site security under Division 30 of the PRC [Public Resource Code], Title 27, California Code of Regulations (27 CCR), and Title 14, California Code of Regulations (14 CCR).

Source:Esri Maps & Data, 2017,:Prepared By: AECOM, 2017.

County Boundary

0 25 50 Miles

Figure 1
Regional Map



Source:Esri Maps & Data, 2017,:Prepared By: AECOM, 2017.

Figure 2
Project Vicinity Map

LEGEND

- EXISTING 10' CONTOUR
- EXISTING 2' CONTOUR
- EXISTING PAVED ROAD
- EXISTING UNPAVED ROAD
- EXISTING FENCE
- EXISTING GUY WIRE
- EXISTING DRAINAGE
- APPROXIMATE LIMITS OF LANDFILL
- APPROXIMATE LIMITS OF WASTE
- ANOMALOUS AREA
- MAGNETIC ANOMALIES AREA
- EXISTING POWER POLE
- CONTROL POINT
- TEST PIT LOCATION (TB_5A)

TEST PIT DATA

TEST PIT/ TRENCH	SOIL COVER THICKNESS	DEPTH OF WASTE (FEET)
TB-1	NO WASTE ENCOUNTERED	
TB-2	2.0	2.0 TO 3.0
TB-3	1.3	1.3 TO 3.8
TB-4	NO WASTE ENCOUNTERED NATIVE ALLUVIUM	
TB-5	1.5	1.5 TO 3.5
TB-6	NO WASTE ENCOUNTERED. NATIVE SOIL AND ALLUVIUM	
TB-7	NO WASTE ENCOUNTERED FILL AND NATIVE SOIL	
TB-8	0.6	0.6 TO 3.0
TB-9	NO WASTE ENCOUNTERED	
TB-10	0	0 TO 3.0
TB-11	0	0 TO 1.5
TB-12	LITTER AT GROUND SURFACE OVER NATIVE SOIL	
TB-13	MINOR SURFACE DEBRIS OVER NATIVE SOIL/ALLUVIUM	
TB-14	SURFACE DEBRIS OVER NATIVE SOIL/ALLUVIUM	
TB-15	(TRENCH) 0.5	0.5 TO 3.2
TB-16	(TRENCH) 0.5	0.5 TO 5.0+
TB-17	(TRENCH) 0.5	0.5 TO 3.0+
TB-18	(TRENCH) 0.5	0.5 TO 3.0
TB-19	(TRENCH) SURFACE DEBRIS OVER NATIVE SOIL/ALLUVIUM	
TB-20	(TRENCH) SURFACE DEBRIS OVER NATIVE SOIL/ALLUVIUM	

NOTES:

1. *EXISTING TOPOGRAPHY BASED ON AN AERIAL SURVEY PERFORMED BY COOPER AERIAL SURVEYS ON SEPTEMBER 7, 2017.*
2. *ANOMALOUS AREAS, MAGNETIC AREAS, AND APPROXIMATE LIMITS OF WASTE WERE DEVELOPED FROM THE GEOPHYSICAL SURVEY PEFORMED IN MARCH 2016.*
3. *TEST PITS WERE PERFORMED BY GEO-LOGIC AND CALRECYCLE IN APRIL 2016.*

Source: Geo-Logic Associates, 2017

Map not to scale.

Figure 3
Existing Site Plan

1.5 Description of the Proposed Project

The proposed project would remediate the Brockman Lane Disposal Site through waste reconsolidation, landfill cover, final grading, and re-seeding. Scattered surface and near-surface wastes and debris would be collected, placed within the existing landfill area, and subsequently capped with clay and soil. Covering the site wastes with a soil cover would help reduce the potential for scavenging, direct human contact, vectors, and wind-blown or stormwater runoff transported litter.

The proposed project would screen, sort, recycle, and reconsolidate surface and near surface debris within the project area, which is comprised of nearly the entire landfill. Surface and near surface waste that could not be recycled would be reconsolidated over the existing landfill area.

Wastes from illegal dumping have been periodically reconsolidated to a series of north-south trending berms at the site. Illegally dumped wastes from the soil berms would be sorted to separate recyclables, wastes that are not readily compactible (i.e. tires, large bulky wastes, etc.), and wastes to be reconsolidated on the existing landfill. Recyclables and wastes that are not readily compactible would be hauled to appropriate permitted facilities for final disposal. Recyclables and residual wastes would be hauled to the appropriate permitted facility.

Approximately 30,400 cubic yards of waste, including 28,000 cubic yards in the soil berms and 2,400 cubic yards in the landfill would be reconsolidated. It is estimated that approximately 30 percent (8,400 cubic yards) of this material excavated from the soil berms could be recycled. The remaining 22,000 cubic yards, including 3,000 cubic yards of additional surface waste from the site, would require reconsolidation for a total of approximately 25,000 cubic yards. The landfill and soil berms would be excavated to a depth up to 15 feet.

A soil cover would be constructed over the reconsolidated waste prism and existing landfill to enhance drainage conditions and to reduce the potential for future litter production. The existing landfill and the waste reconsolidation area would be graded then covered with at least two feet of clean fill soils derived from on-site borrow areas. The cover soil would be moisture conditioned and compacted to minimize future erosion. The soil cover grades would match current grades and be constructed to provide positive drainage off the cover system. It is estimated that approximately 17,000 cubic yards of compacted in-place soil would be required. The waste excavation would be screened and suitable soil would be used as cover material. In addition, approximately 2,000 cubic yards of soil would be excavated for the drainage ditch. A majority of the soil screened from the soil berms would be suitable for use as cover material. Excess soil would be strategically stockpiled around the site perimeter to discourage illegal dumping. If the soil from the berms is unsuitable for cover material, a sufficient quantity of cover soil could be generated through strategic grading to promote drainage.

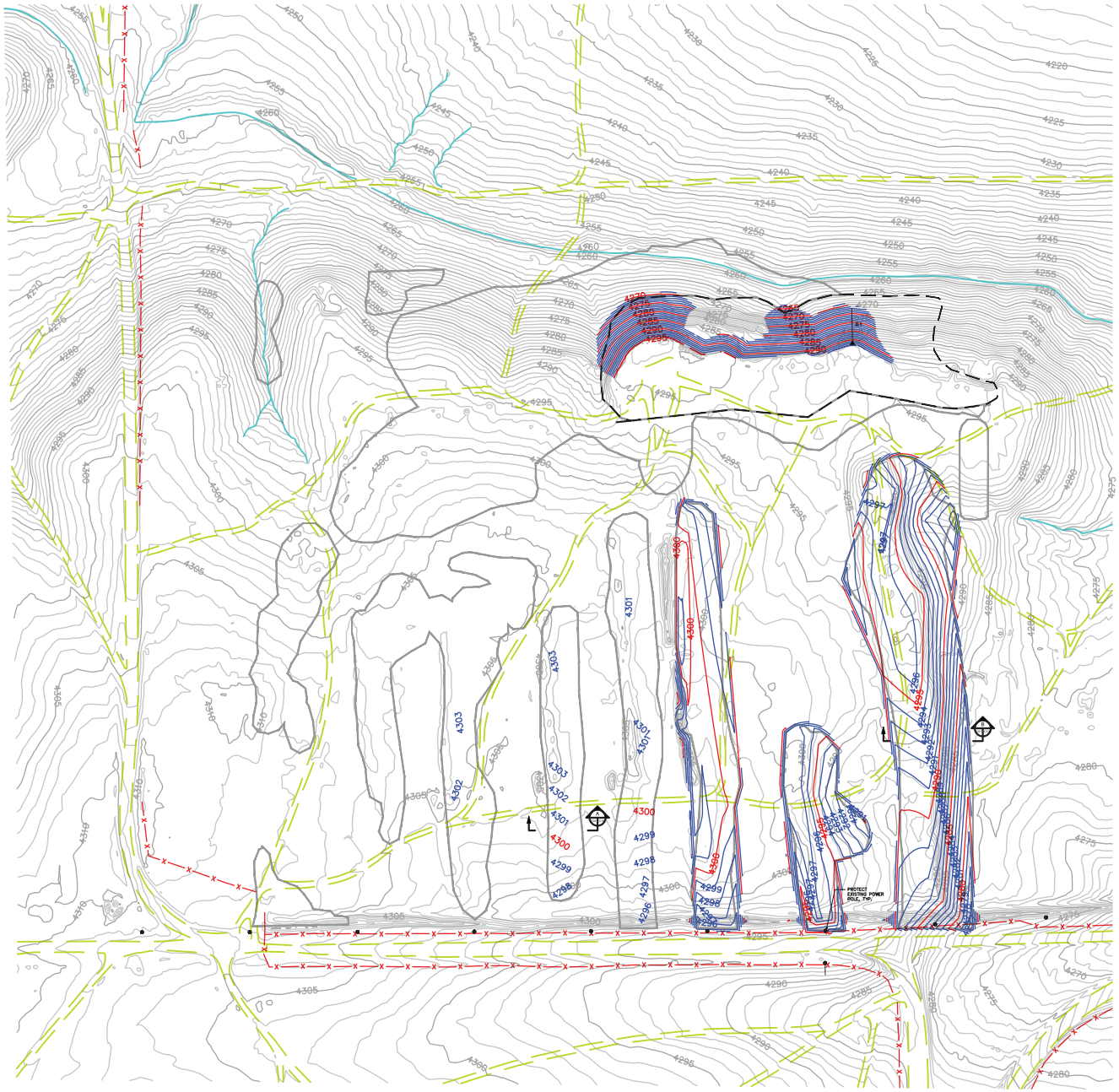
The soil cover would be re-seeded as a method of addressing long-term erosion control and to reduce the potential for erosive forces to expose wastes. Revegetation of the soil cover would help stabilize the soils from wind and stormwater runoff erosion. Following construction of the cover system, a seed mix matching local plant communities would be applied to the cover soils to promote vegetative growth and provide further long-term stability of the cover soil. Although the excavation area would not be regraded or filled in

with additional earthwork once excavation is complete due to its gentler slopes, the excavation areas would be re-seeded.

Excess soil and boulders would be strategically stockpiled around the site perimeter and access roads to discourage illegal dumping and increase the level of security. After covering, oversized materials would be placed over the cover to provide rock armouring to minimize wind and surface water erosion potential, all disturbed disposal and soil borrow areas would be re-seeded, and stormwater best management practices would be installed to further reduce future erosion potential. Long-term measures for erosion control near the cover system include construction of a drainage ditch to promote positive drainage away from the pile. The drainage ditch would also be re-seeded. In addition to the drainage ditch, straw wattles would be installed on the slopes every five vertical feet on contour and maintained until the vegetation is established.

After remediation is completed, the site fencing would be added to currently unfenced areas of the project site to restrict access to authorized users only, and signage would be added to the site perimeter directing the public to the Bishop-Sunland Landfill for legal waste disposal. Figures 4 and 5 show the proposed site plans for waste excavation and fill and grading.

Following completion of the soil cover, the project site would be routinely monitored and maintained to inspect the performance of the soil cover, establishment of vegetation and/or invasive weeds, and the potential for soil erosion or settlement cracking. Periodic maintenance activities may be required to control invasive weed species, replant vegetation, or repair localized soil erosion or differential settlement cracks.



LEGEND

- EXISTING 10' CONTOUR
- EXISTING 2' CONTOUR
- PROPOSED 5' CONTOUR
- PROPOSED 1' CONTOUR
- EXISTING PAVED ROAD
- EXISTING UNPAVED ROAD
- EXISTING FENCE
- EXISTING GUY WIRE
- EXISTING DRAINAGE
- APPROXIMATE LIMITS OF LANDFILL
- APPROXIMATE LIMITS OF WASTE
- EXISTING POWER POLE

QUANTITIES

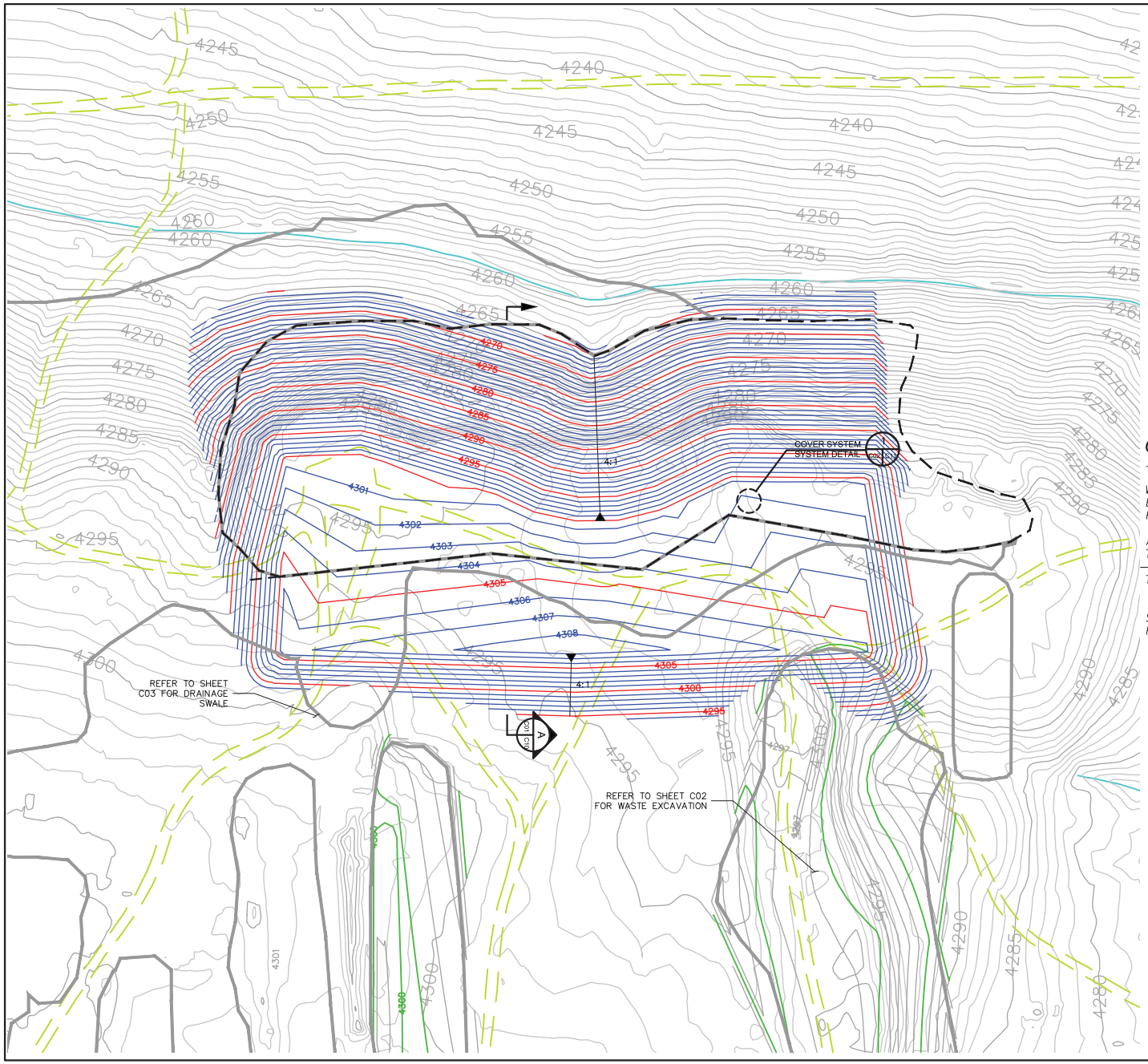
WASTE EXCAVATION:	~28,000 CY
ASSUMED WASTE EXPORTED TO RECYCLING CENTER (ASSUMED 30%):	~8,400 CY
LANDFILL WASTE EXCAVATION AND REGRADING	~2,400 CY
WASTE FROM EXCAVATION TO BE RECONSOLIDATED:	~22,000 CY

NOTES:
1. EXISTING TOPOGRAPHY BASED ON AN AERIAL SURVEY PERFORMED BY COOPER AERIAL SURVEYS ON SEPTEMBER 7, 2017.
2. RECYCLABLE WASTE EXCAVATION LIMITS AND DEPTHS ARE APPROXIMATE AND SHOULD BE VERIFIED IN THE THE FIELD BY CALRECYCLE OR REPRESENTATIVE.

Source: Geo-Logic Associates, 2017

Map not to scale.

Figure 4
Proposed Site Plan - Waste Excavation Plan



LEGEND

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- EXISTING FENCE
- EXISTING GUY WIRE
- EXISTING DRAINAGE
- APPROXIMATE LIMITS OF LANDFILL
- APPROXIMATE LIMITS OF WASTE

QUANTITIES

WASTE FROM EXCAVATION TO BE RECONSOLIDATED:	~22,000 CY
ASSUMED SURFACE WASTE TO BE RECONSOLIDATED:	~3,000 CY
TOTAL WASTE IN COVER PILE	~25,000 CY
SOIL REQUIRED FOR COVER SYSTEM:	~17,000 CY

NOTES:

1. EXISTING TOPOGRAPHY BASED ON AN AERIAL SURVEY PERFORMED BY COOPER AERIAL SURVEYS ON SEPTEMBER 7, 2017.
2. RECYCLABLE WASTE EXCAVATION LIMITS AND DEPTHS ARE APPROXIMATE AND SHOULD BE VERIFIED IN THE THE FIELD BY CALRECYCLE OR REPRESENTATIVE.

Source: Geo-Logic Associates, 2017

Map not to scale.

Figure 5
Proposed Site Plan - Waste Fill and Final Grading Plan

1.6 Construction Schedule and Procedures

Construction of the proposed project is anticipated to begin in Spring 2019 and take up to nine months to complete. Up to 20 construction workers would be working on the proposed project at any time. Construction equipment required for project construction would include up to three excavators, three end dumps, two dozers, a compactor, a grader, and three water trucks. Primary access points for construction vehicles would be located near major access roads to the project site.

Excavation at the project site would create truck trips for removing the recyclables and waste from the project site for off-site disposal. The project construction would create up to approximately 8,400 cubic yards of recyclables/waste for removal. Approximately, 17,000 cubic yards of soil would be required to cover the system. Some soil would be provided onsite and other soil may be imported. Overall, approximately 500 total off-site truck trips may be required for recycling and waste removal activities.

Generally, in accordance with the local noise ordinance, construction activity would occur Mondays through Fridays from 6:00 a.m. to approximately 7:00 p.m. Temporary construction fencing would be placed around the property boundary or extended area of construction, if necessary. Permit restrictions on areas of public access may limit the placement of the temporary fencing.

An appropriate combination of monitoring and resource impact avoidance would be employed during all phases of the proposed project, including implementation of the following Best Management Practices (BMPs):

- The waste reconsolidation cover system would be capped with a minimum of two feet of cover soils.
    - Cover soils should be moisture conditioned to within 2 percent of optimum, placed, and compacted to a minimum of 90 percent relative compaction as established by American Society for Testing and Materials (ASTM) D1557.
    - Clear and grubbed soils from the borrow areas not containing waste or debris may be blended with soil and incorporated back into the upper six inches of the cover. The final six inches of cover material should be loosely placed, between 83 to 88 percent relative compaction (ASTM D1557) to allow for the establishment of vegetation.
    - Soil cover slopes, excavation areas, borrow areas, and otherwise disturbed areas should be revegetated using the recommended seed mixture. It is recommended that sloped areas of the cover and borrow area be left with a track-walked surface, and all revegetation areas receive a straw or mulch stabilizer to protect from erosion until the vegetation is able to become established. A starter fertilizer may be used to enhance early growth.
- The proposed project would implement Rule 401 fugitive dust control measures required by the Great Basin Unified Air Pollution Control District (APCD), which requires reasonable precautions to be taken to prevent visible particulate matter from being airborne, under normal wind conditions, beyond the property from which the

emission originates. Reasonable precautions include, but are not limited to the following:

  - Application of water on dirt roads, material stockpiles, and other surfaces that can give rise to airborne dusts; and
  - Maintenance of roadways in a clean condition.

- The proposed project would implement Rule 402 measures required by the Great Basin Unified APCD, which prohibits the discharge from any source whatsoever, such quantities of air contaminants or other materials that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or that cause or have a natural tendency to cause injury or damage to business or property.

- Through correspondence with Great Basin Unified APCD staff, it was determined that the proposed project would not be subject to Rule 216-A New Source Review Requirements for Determining Impact on Air Quality – Secondary Sources. In lieu of obtaining a secondary source permit, the proposed project shall prepare a Dust Control Plan to ensure compliance with the provisions of Rule 401 and Rule 402.

- To reduce the amount of offsite sediment migration by stormwater runoff, temporary erosion control measures would be installed on the reconsolidated waste prism to reduce the potential for erosion until the re-seeded vegetation is established. The construction contractor would develop and implement an erosion control plan and Storm Water Pollution Prevention Plan (SWPPP) for construction activities which would include, but not be limited to, the following erosion control BMPs:

  - Minimizing the extent of disturbed areas and duration of exposure
  - Retaining sediment within the construction area
  - Use of silt fences or straw wattles
  - Temporary soil stabilization
  - Temporary drainage inlet protection
  - Temporary water diversion around immediate work area

- LADWP would ensure all construction crews have fire-suppression equipment (such as fire extinguishers) onsite to respond to the accidental ignition of a fire.

- Spill kits will be available onsite for potential leaks or spills of hazardous materials.

- LADWP would minimize short-term construction noise through: (1) proper maintenance and tuning of all construction equipment engines to minimize noise emissions; and (2) proper maintenance and functioning of the mufflers on all internal combustion and equipment engines. There are no structures or residences nearby.

- LADWP would work with local authorities to prepare a construction traffic notification procedure to minimize off-site transportation and traffic effects.

1.7 Required Permits and Approvals

Numerous approvals and/or permits would be required to implement the proposed project. The environmental documentation for the project would be used to facilitate compliance with federal and state laws and the granting of permits by various state and local agencies having jurisdiction over one or more aspects of the project. These approvals and permits may include, but may not be limited, to the following:

City of Los Angeles Department of Water and Power

- Certification by the City of Los Angeles Board of Water and Power Commissioners that the environmental document was prepared in accordance with CEQA and other applicable codes and guidelines

- Approval by the City of Los Angeles Board of Water and Power Commissioners of the proposed project

State Water Resources Control Board

- Statewide Storm Water Permit Associated with Construction Activities

Lahontan Regional Water Quality Control Board

- Water Discharge Requirement

- National Pollution Discharge Elimination System Permit for construction dewatering and hydrostatic test water discharge

California Department of Transportation

- Transportation Permit

- Approval of Traffic Management Plan

- Approval of temporary road closures

SECTION 2
INITIAL STUDY CHECKLIST

The following discussion of potential environmental effects was completed in accordance with Section 15063(d)(3) of the CEQA Guidelines (2017) to determine if the proposed project may have a significant effect on the environment.

CEQA INITIAL STUDY FORM

Project Title:

Brockman Landfill Remediation Project

Lead Agency Name and Address:

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

Contact Person and Phone Number:

Christopher Lopez
Environmental Affairs
Los Angeles Department of Water and Power
(213) 367-3509

Project Sponsor's Name and Address:

Los Angeles Department of Water and Power
111 North Hope Street
Los Angeles, CA 90012

Project Location:

The project area is located within the northern portion of Inyo County, north of the intersection of Riverside Road and Brockman Lane, just northeast of Bishop, California.

General Plan Designation:

The project site is designated as State and Federal Lands in the Inyo County General Plan.

Zoning:

The project site is zoned OS (Open Space).

Description of Project:

The proposed project would remediate the Brockman Lane Disposal Site through waste reconsolidation, landfill cover, final grading, and re-seeding. The proposed project would screen, sort, recycle, and reconsolidate surface and near surface debris within the project area, which is comprised of nearly the entire landfill. Surface and near surface waste that could not be recycled would be reconsolidated over the existing landfill area, and subsequently capped with clay and soil. Covering the site wastes with a soil cover would help reduce the potential for scavenging, direct human

contact, vectors, and wind-blown or stormwater runoff transported litter. The soil cover would be re-seeded as a method of addressing long-term erosion control and to reduce the potential for erosive forces to expose wastes. Revegetation of the soil cover would help stabilize the soils from wind and stormwater runoff erosion. After remediation is completed, the site fencing would be added to currently unfenced areas of the project site to restrict access to authorized users only, and signage would be added to the site perimeter directing the public to the Bishop-Sunland Landfill for legal waste disposal.

Following completion of the soil cover, the project site would be routinely monitored and maintained to inspect the performance of the soil cover, establishment of vegetation and/or invasive weeds, and the potential for soil erosion or settlement cracking. Periodic maintenance activities may be required to control invasive weed species, replant vegetation, or repair localized soil erosion or differential settlement cracks.

Surrounding Land Uses and Setting:

The project site is located within the northern portion of Inyo County in an area approximately 4,300 feet in elevation. The LADWP-owned Brockman Lane Disposal Site is located north of the intersection of Riverside Road and Brockman Lane, just northeast of Bishop, California. The project site occupies approximately 33.5 acres of open land that forms a portion of the southern edge of the Owens River Valley. The project site contains a landfill characterized by a series of parallel, north-south oriented soil berms that rise approximately five to ten feet above the adjacent ground surface. In the southern half of the project site, the ground surface between these berms is relatively flat or gently sloping to the north. In the northern half of the project site, the ground surface slopes to the north forming a ridge overlooking the Owens River. The ground is covered with sparse vegetation, litter, debris, and solid waste. Landfilled waste is exposed on north-facing slopes in the northeastern quadrant of the project site.

The project site is surrounded by sparsely vegetated vacant or undeveloped lands. The nearest land use includes single-family residences located approximately 0.7 miles southeast of the project site in the City of Bishop. In addition, Bishop Creek travels generally in a north-south orientation located approximately 0.3 miles east of the project site.

Responsible/Trustee Agencies:

- Lahontan Regional Water Quality Control Board
- State of California, Department of Transportation
- California Department of Resources Recycling and Recovery (CalRecycle)
- County of Inyo

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the Environmental Impacts discussion in Section 3.

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

DETERMINATION

On the basis of this initial evaluation:

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

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an environmental impact report is required.

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

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

_____ _____

Signature Date

Charles C. Holloway
Manager of Environmental Assessment and Planning
Los Angeles Department of Water and Power

		Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	**AESTHETICS**. Would the project:				
a.	Have a substantial adverse effect on a scenic vista?				**X**
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				**X**
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?				**X**
d.	Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?				**X**
II.	**AGRICULTURE AND FORESTRY RESOURCES**. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				**X**
b.	Conflict with existing zoning for agricultural use, or a Williamson act contract?				**X**
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				**X**
d.	Result in the loss of forest land or conversion of forest land to non-forest use?				**X**
e.	Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				**X**

		Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
III.	**AIR QUALITY**. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a.	Conflict with or obstruct implementation of the applicable air quality plan?			**X**	
b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			**X**	
c.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			**X**	
d.	Expose sensitive receptors to substantial pollutant concentrations?			**X**	
e.	Create objectionable odors affecting a substantial number of people?			**X**	
IV.	**BIOLOGICAL RESOURCES**. Would the project:				
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		**X**		
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				**X**
c.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				**X**
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			**X**	
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				**X**
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				**X**

		Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
V.	**CULTURAL RESOURCES**. Would the project:				
a.	Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?			**X**	
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?		**X**		
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			**X**	
d.	Disturb any human remains, including those interred outside of formal cemeteries?		**X**		
VI.	**GEOLOGY AND SOILS**. Would the project:				
a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			**X**	
	ii) Strong seismic ground shaking?			**X**	
	iii) Seismic-related ground failure, including liquefaction?			**X**	
	iv) Landslides?				**X**
b.	Result in substantial soil erosion, loss of topsoil, or changes in topography or unstable soil conditions from excavation, grading, or fill?			**X**	
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			**X**	
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				**X**
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				**X**
VII.	**GREENHOUSE GAS EMISSIONS**: Would the project:				
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impacts on the environment?			**X**	

		Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	
VIII.	**HAZARDS AND HAZARDOUS MATERIALS**: Would the project:				
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d.	Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			X	
IX.	**HYDROLOGY AND WATER QUALITY**. Would the project:				
a.	Violate any water quality standards or waste discharge requirements?			X	
b.	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				X

		Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?			X	
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?			X	
e.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			X	
f.	Otherwise substantially degrade water quality?			X	
g.	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
h.	Place within a 100-year flood hazard area structures that would impede or redirect flood flows?				X
i.	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X	
j.	Inundation by seiche, tsunami, or mudflow?				X
X.	**LAND USE AND PLANNING**. Would the project:				
a.	Physically divide an established community?				X
b.	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				X
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?				X
XI.	**MINERAL RESOURCES**. Would the project:				
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b.	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X
XII.	**NOISE**. Would the project result in:				

		Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b.	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			X	
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X
XIII.	**POPULATION AND HOUSING**. Would the project:				
a.	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b.	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X
c.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X
XIV.	**PUBLIC SERVICES**.				
a.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	i) Fire protection?				X
	ii) Police protection?				X
	iii) Schools?				X
	iv) Parks?				X

	Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
v) Other public facilities?				**X**
XV. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				**X**
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?				**X**
XVI. TRANSPORTATION/TRAFFIC. Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			**X**	
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			**X**	
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				**X**
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				**X**
e. Result in inadequate emergency access?			**X**	
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				**X**
XVII. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?				**X**

	Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of the Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	
XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			X	
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				X
e. Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X	
g. Comply with federal, state, and local statutes and regulations related to solid waste?			X	
XIX. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		

	Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.			X	
c. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?			X	

SECTION 3
ENVIRONMENTAL IMPACT ASSESSMENT

The following discussion addresses impacts to various environmental resources per the Initial Study checklist questions contained in Appendix G of the CEQA Guidelines.

I. AESTHETICS

Would the project:

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

No Impact. The proposed project would not have an adverse effect on a scenic vista. Scenic views or vistas are generally defined as panoramic public views to various natural features, including large water bodies, striking or unusual natural terrain, or unique urban or historic features. Public access to these views may be from park lands, private and publicly owned sites, and public rights-of-way.

The project site is located within the northern portion of Inyo County on open land, approximately 4,300 feet in elevation. The project site is accessible via north of the intersection of Riverside Road and Brockman Lane, just northeast of Bishop, California. The project site is approximately 1.5 miles north of United States Route 395 (US 395). The primary public scenic vista (view corridor) within the project area is US 395. However, the proposed project would not involve the construction of a new development or buildings that would block or obstruct existing scenic views or vistas from US 395 or to any residents and visitors within the project area. As a result, no impact to a scenic vista would occur.

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

No Impact. In the project area, US 395 is an eligible state scenic highway, although not officially designated.[1] The proposed project would involve constructing a soil cover over a reconsolidated waste prism at the existing landfill. The completion of the project will result in the waste reconsolidation area covered with clean fill soils. As discussed in Section I(a) above, implementation of the proposed project area would not involve the construction of a new development or buildings that would block or obstruct or damage existing scenic views or vistas. In addition, the proposed project would not substantially damage any scenic resources within a state scenic highway. No impacts to scenic resources would occur.

[1] California Department of Transportation, *State Scenic Highway Program*, Search by County, Inyo County. Website: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed February 2018.

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

No Impact. A project is generally considered to have a significant visual/aesthetic impact if it substantially changes the character of the project site such that it becomes visually incompatible or visually obtrusive when viewed in the context of its surroundings. The proposed project would not substantially degrade the existing visual character or quality of the project site or its surroundings. Modifications will be made to the existing landfill surface area with soil and clay covering the site. The visual character of the project site would change from a landfill characterized by a series of soil berms, sparse vegetation, litter, debris and solid waste to a reconsolidated surface with a soil cover to minimize future erosion, enhance drainage conditions and to reduce illegal littering. This change could be considered a visual improvement. No adverse impacts to the existing visual character or quality of the site would occur.

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

No Impact. Implementation of the proposed project would not create a new source of light or glare that would adversely affect day or nighttime views. No permanent night lighting or reflective surfaces would be installed as part of the proposed project. Construction activities would be completed during daytime hours, eliminating the need for nighttime lighting. Therefore, no short- or long-term impact from light or glare would occur.

II. AGRICULTURE AND FORESTRY RESOURCES

Would the project:

a) Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. Neither the project site nor the surrounding area is designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the "Important Farmland in California" map prepared by the California Resources Agency pursuant to the Farmland Mapping and Monitoring Program.[2] Therefore, the proposed project would not convert farmland to a non-agricultural use, and no impact to farmland would occur.

[2] State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, *Important Farmland in California, 2014* map. Published July 2017. Website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/fmmp2014_08_11_noroads.pdf, accessed February 2018.

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

No Impact. The project site and surrounding area are located entirely on LADWP land and zoned as Open Space and designated as State and Federal Lands in Inyo County General Plan.[3,4] Additionally, the Project site and surrounding lands are not part of a Williamson Act contract. Therefore, no conflicts with agricultural zoned uses or a Williamson Act contract would result. No impact would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The project site is not zoned for forest or timberland. Project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production as defined in Public Resources Code Section 12220(g) and Government Code Section 4526. No conflicts with forest or timberland zoning would occur. No impact would occur.

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

No Impact. As discussed in Section II(c) above, no portion of the project site is zoned or developed for forest land use. Project implementation would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As stated in Section II(a) above, no portion of the project site or surrounding area is identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Additionally, there are no agricultural or forest uses in the project vicinity. Therefore, project implementation would not result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.

[3] Inyo County Planning Department, Interactive Mapping, Parcel Information System, search for project site. Website: https://inyocounty.maps.arcgis.com, accessed February 2018.

[4] Inyo County Planning Department, General Plan, Land Use and Conservation/Open Space Elements, *Diagram 1 –County-Wide* map, January 16, 2002. Website: http://inyoplanning.org/general_plan/graphics/landuse/Diag01.pdf, accessed February 2018.

III. AIR QUALITY

Potential impacts to air quality associated with the proposed project were determined from the results presented in the Air Quality Technical Memorandum prepared for the proposed project (see Appendix A).

Would the project:

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

Less Than Significant Impact. The project site is located in an area that is designated attainment for all National Ambient Air Quality Standards (NAAQS), and therefore an applicable federal air quality plan does not exist for the project area. The Inyo County General Plan contains a Public Safety Element that includes a topic area devoted to Air Quality. Goal AQ-1 of the Public Safety Element of the General Plan emphasizes the provision of good air quality for Inyo County to reduce impacts to human health and the economy. Goal AQ-1 policies include:

- **Policy AQ-1.1 Regulations to Reduce PM_{10}:** Support the implementation of the State Implementation Plan and the agreement between Great Basin Unified APCD and the LADWP to reduce respirable particulate matter less than 10 microns in diameters (PM_{10}).
- **Policy AQ-1.3 Dust Suppression During Construction:** Require dust-suppression measures for grading activities.

The following discussion addresses the potential for air pollutant emissions during construction and operation of the project to conflict with or obstruct implementation of Goal AQ-1 of the Public Safety Element.

Construction of the proposed project is anticipated to begin in spring 2019 and persist for approximately nine months. The LADWP determined that construction of the proposed project would require up to 20 construction workers at a time, and an equipment inventory consisting of up to three excavators, three end dumps, two dozers, a compactor, a grader, and three water trucks. The excavators and grader would generate fugitive dust emissions during material displacement and site leveling activities. The water trucks employed on the project site would be used to suppress dust during the ground disturbance activities. Based on controlled dust suppression studies, application of water to disturbed areas would reduce fugitive dust (PM_{10} emissions) by approximately 61 percent. Construction activities would be conducted in accordance with Great Basin Unified APCD Rule 401 and Rule 402 to prevent the occurrence of unwarranted fugitive dust emissions and public nuisances. Therefore, construction of the proposed project would not conflict with or obstruct implementation of Goal AQ-1 of the Public Safety Element.

Operations would involve routine maintenance activities to ensure that the soil cover is achieving the desired objective of stabilizing existing wastes. The operational condition of the project site would not change following

the completion of construction activities. Operations would not introduce any new source of air pollutant emissions to the project area, and therefore, does not have the potential to conflict with or obstruct implementation of the Air Quality goal of the Inyo County General Plan; this impact would be less than significant.

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

Less Than Significant Impact. The Great Basin Unified APCD has not officially adopted any thresholds of significance that control air pollutant emissions generated by individual CEQA projects within the Great Basin Valley Air Basin. Construction activities involved with implementation of the proposed project would employ the following BMPs to comply with Great Basin Unified APCD Rule 401 Fugitive Dust:[5]

- Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or clearing of land;
- Application of asphalt, water, or suitable chemicals on dirt roads, material stockpiles, and other surfaces which can give rise to airborne dusts; and
- Maintenance of roadways in a clean condition.

The application of water to disturbed areas and material stockpiles would reduce fugitive dust emissions by approximately 61 percent. Maximum daily air pollutant emissions during construction activities were quantified using the California Emissions Estimator Model (CalEEMod, Version 2016.3.2) conservatively assuming that 20 construction workers would report to the site every day and that all required equipment would be used continuously for eight hours per day. The CalEEMod software is the preferred tool for estimating air pollutant emissions associated with land use development projects under CEQA.

Construction of the proposed project would generally involve similar activities throughout the nine-month construction schedule. To contextualize air pollutant emissions associated with construction activities, maximum daily air pollutant emissions were compared to the South Coast Air Quality Management District (SCAQMD) Air Quality Significance Thresholds applicable to mass daily emissions from construction of individual CEQA projects.[6] The thresholds were derived for projects within the SCAQMD jurisdiction, which is subject to worse air quality than the project area. Therefore, the invocation of these Mass Daily Thresholds represents a conservative approach to evaluating maximum daily air pollutant emissions that would be generated by construction of the proposed project. Table 1 presents the maximum daily emissions of volatile organic compounds (VOC), nitrogen oxides (NO_X), carbon monoxide (CO), sulfur oxides (SO_X), PM_{10}, and fine particulate matter less than two and a half microns in

[5] Great Basin Unified Air Pollution Control District, *Rules and Regulations for the Great Basin Unified Air Pollution Control District*, April 2016.

[6] South Coast Air Quality Management District, *SCAQMD Air Quality Significance Thresholds – Mass Daily Thresholds*, Revised March 2015.

diameter ($PM_{2.5}$) that would be generated by construction of the proposed project and compares them to the SCAQMD Mass Daily Thresholds.

Table 1: Maximum Daily Construction Emissions

Construction Emissions Analysis	Daily Pollutant Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	5.0	50.4	31.5	<0.1	25.4	6.7
SCAQMD Regional Significance Threshold	75	100	550	150	150	55
Exceed Regional Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Emissions modeling files can be found in the technical Appendix.
Source: Terry A. Hayes Associates Inc., 2018.

As shown in Table 1, maximum daily emissions of air pollutants during construction activities would remain well below the SCAQMD Mass Daily Thresholds. The SCAQMD Mass Daily Thresholds were designed to prevent the occurrence of air quality violations during construction of CEQA projects. Therefore, construction of the proposed project does not have the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation. This impact would be less than significant.

Operations would involve routine maintenance activities to ensure that the soil cover is achieving the desired objective of stabilizing existing wastes. The operational condition of the project site would not change following the completion of construction activities. Operations would not introduce any new source of air pollutant emissions to the project area, and therefore does, not have the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation. This impact would be less than significant.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. The project area is currently designated nonattainment for the State ozone (O_3) and PM_{10} standards and is designated attainment for all federal standards. The Great Basin Unified APCD has not officially established a comparative metric threshold for determining whether air pollutant emissions generated by construction of individual CEQA projects would represent a cumulatively considerable increase in O_3-precursor (VOC and NO_X) emissions or PM_{10} emissions. As an industry standard, the SCAQMD generally embraces the reasoning that if construction of an individual project would not generate air pollutant emissions exceeding any of the applicable Mass Daily Thresholds, then that project is regarded as being not cumulatively considerable.[7] The rationale relies upon the notion that the Mass Daily

[7] South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution – Appendix D Cumulative Impact Analysis Requirements Pursuant to CEQA*, August 2003.

Thresholds control emissions from individual projects sufficiently to prevent occurrences of air quality violations, and for that reason the SCAQMD project-specific and cumulative significance thresholds are the same. Construction of the proposed project would not generate air pollutant emissions exceeding any SCAQMD Mass Daily Threshold, and therefore would not result in a cumulatively considerable net increase of VOC, NO_X, or PM_{10} emissions. This impact would be less than significant.

Operations would not introduce any new sources of air pollutant emissions to the project area. Following the completion of construction activities, operations would be essentially identical to existing conditions. Operations would not increase VOC, NO_X, or PM_{10} emissions, and may actually reduce VOC off-gassing from the surface of the landfill due to the soil cover enhancements. Operations would not result in a cumulatively considerable net increase of any nonattainment pollutant. This impact would be less than significant.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The nearest land use to the project site that constitutes a sensitive receptor is the residence located approximately 0.7 miles southeast of the project site in the City of Bishop. The proposed project would comply with Great Basin Unified APCD Rule 401 related to fugitive dust and Rule 402 related to air containments. There are no sensitive receptors within close enough proximity to the project site that substantial pollutant concentrations would be capable of reaching through fate and transport driven by atmospheric dispersion. Pollutant concentrations resulting from heavy-duty equipment use and vehicle trips would dissipate prior to encountering any sensitive receptors. This impact would be less than significant.

One of the primary objectives of the proposed project is to reduce existing and future risks to public health. The proposed project would comply with Great Basin Unified APCD Rule 401 related to fugitive dust and Rule 402 related to air containments. Operation of the proposed project would not introduce any new sources of air pollutant emissions to the project area. Following the completion of construction activities, operation of the proposed project would be essentially identical to existing conditions. Operation of the proposed project would involve routine maintenance activities to ensure that the soil cover is achieving the desired objective of stabilizing existing wastes and minimizing the future exposure risks to public health. The operational condition of the project site would not change following the completion of construction activities. Operation of the proposed project would not introduce any new source of air pollutant emissions to the project area, and therefore, does not have the potential to expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant.

e) Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. Sources that may potentially emit odors during construction activities include equipment exhaust and off-gassing of disturbed waste. Odors from these sources would be localized and generally confined to the immediate area surrounding the project site. Construction of the proposed

project would employ best management practices (e.g., inspections and maintenance of diesel-fueled heavy-duty equipment in compliance with Great Basin Unified APCD regulations) to prevent the occurrence of a nuisance odor in accordance with Great Basin Unified APCD Rule 402, and the odors would be typical of most construction sites and temporary in nature. There are no schools or public parks, or other sensitive land uses in close proximity to the project site that would be especially sensitive to odors emanating from these sources. Additionally, the construction of the proposed project would adhere to all requirements set forth in the Great Basin Unified APCD Rules and Regulations. This impact would be less than significant.

Operation of the proposed project would not introduce any new sources of air pollutant emissions to the project area. Following the completion of construction activities, operation of the proposed project would be essentially identical to existing conditions. Operation of the proposed project would involve routine maintenance activities to ensure that the soil cover is achieving the desired objective of stabilizing existing wastes and minimizing the future exposure risks to public health. The operational condition of the project site would not change following the completion of construction activities. Operation of the proposed project would not introduce any new source of air pollutant emissions to the project area, and therefore, does not have the potential to generate odors affecting a substantial number of people. Operation of the proposed project would reduce the likelihood that noxious odors would affect members of the public due to the enhancements in the soil cover distribution. This impact would be less than significant.

IV. BIOLOGICAL RESOURCES

Potential impacts to biological resources associated with the proposed project were determined from the results presented in the Biological Assessment prepared for the proposed project (see Appendix B).

Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact With Mitigation Incorporated. Sensitive plants include those listed as threatened or endangered, proposed for listing, or candidate for listing by the U.S. Fish and Wildlife Service (USFWS) under the federal Endangered Species Act, and/or the California Department of Fish and Wildlife (CDFW) under the California Endangered Species Act, or those listed by the California Native Plant Society (CNPS). [8,9,10] Sensitive wildlife species are

[8] Species listed or proposed for listing as threatened or endangered under the federal Endangered Species Act (Title 50 Code of Federal Regulations [CFR] 17.12 [listed plants], Title 50 CFR 17.11 [listed animals] and includes notices in the Federal Register for proposed species).

those species listed as threatened or endangered, proposed for listing, or candidate for listing by USFWS and/or CDFW, or considered special status by CDFW. Sensitive habitats are those that are regulated by USFWS, U.S. Army Corps of Engineers, and/or those considered sensitive by the CDFW.

The California Natural Diversity Database (CNDDB) was initially reviewed for information on known occurrences of sensitive species and communities within the Fish Slough, California U.S. Geological Survey 7.5-minute topographic quadrangle map, and surrounding eight quadrangles (9-quadrangle search). A USFWS species list was also developed prior to conducting a site visit. Based on a review of these databases, 22 sensitive plant species and 19 sensitive wildlife species are known to have occurred in the project region. Additionally, the project site falls within LADWP's Owens Valley Habitat Conservation Plan (HCP)[11] area, which covers seven wildlife species, four of which were not identified during the 9-quadrangle search of the CNDDB, including Bell's vireo (*Vireo bellii*), willow flycatcher (*Empidonax trallii*), yellow-billed cuckoo (*Coccyzus americans*), and greater sage-grouse (*Centrocercus urophasianus*). The other three species covered under the plan that were identified during the CNDDB search include Owens pupfish (*Cyprinodon radiosus*), Owens tui chub (*Siphateles bicolor snyderi*), and Owens/LongValley speckled-dace (*Rhinichtyhs osculus* spp.). In addition to the literature review, a site reconnaissance biological field survey was conducted as part of the proposed project on June 12, 2017.

Sensitive Plants

The project site is generally disturbed from past utilization as a landfill and by current off-road vehicle use and illegal dumping. It is composed of ruderal vegetation consisting of weedy annuals and early seral perennial shrubs. Suitable habitat for sensitive plant species is absent from the project site; however, two sensitive plant species were identified as having Low potential to be impacted by the project. No sensitive plants were observed during the field survey and none are expected to occur on-site. As a result, direct impacts to sensitive plants would not occur.

Indirect impacts to sensitive plant species occurring outside the project site could include the accumulation of fugitive dust, and the colonization of nonnative, invasive plant species. Other indirect impacts could include an increase in the amount of compacted or modified surfaces that, if not controlled, could increase the potential for surface runoff, increased erosion, and sediment deposition within vegetation beyond the project's footprint. With implementation of the BMPs outlined in Section 1.6 above, indirect impacts to vegetation communities outside the project would be avoided and minimized, and not be considered significant.

[9] Species listed or proposed for listing by the State of California as threatened or endangered under the California Endangered Species Act (Title 14 California Code of Regulations 670.5).

[10] Plants listed as rare under the California Native Plant Protection Act (California Fish and Game Code Section 1900 *et seq*.).

[11] Habitat Conservation Plan for Los Angeles Department of Water and Power's Operations, Maintenance, and Management Activities on its Land in Mono and Inyo Counties, California. August 2015.

Sensitive Wildlife Species

Amphibians

One sensitive amphibian species was identified during database reviews of the project region. Surveys focused on identifying sensitive amphibians were not conducted; however, no sensitive amphibians were detected during the field survey. Sensitive amphibian species are not expected in the project area due to a lack of suitable habitat. As a result, no impacts to sensitive amphibians would occur.

Migratory Birds

Congress passed the Migratory Bird Treaty Act (MBTA) in 1918 to prohibit the kill or transport of native migratory birds, or any part, nest, or egg of any such bird unless allowed by another regulation adopted in accordance with the MBTA. The prohibition applies to birds included in the respective international conventions between the United States and Great Britain, the United States and Mexico, the United States and Japan, and the United States and Russia. All birds, except European starlings, English house sparrows, rock doves (pigeons), and non-migratory game birds such as quail, pheasant, and grouse are protected under the MBTA. However, non-migratory game birds are protected under California Fish and Game Code (CFGC) Section 3503. Although no permit is issued under the MBTA, if vegetation removal or construction activities within the project area occur during the breeding season for raptors and migratory birds (February 15 through September 15), USFWS recommends that surveys be conducted to locate active nests within the construction area.

Results of the field survey conducted by LADWP Watershed Resources Specialists verified that suitable bird nesting habitat is absent from the project site, although the site does provide foraging opportunities for birds. Should construction occur during the nesting/roosting season, mitigation measure BR-1 would be implemented which requires that a preconstruction survey be conducted to verify that no nesting birds are present, in order to reduce potential impacts to birds. In addition, implementing the BMPs listed in Section 1.6 above would further reduce potential impacts to birds. As a result, less than significant impacts to birds protected under the MBTA or CFGC would occur.

Fish

Four sensitive fish species were identified during database reviews of the project region. Aquatic habitats suitable for fish are absent from the project site and surrounding area. As a result no impacts to sensitive fish species would occur.

Mammals

Six sensitive mammal species were identified during database reviews of the project region. Surveys focused on identifying sensitive mammals were not conducted; however, no sensitive mammals, including bats, or signs of mammals (i.e. scat, burrows) were detected during the field survey. Suitable habitat for sensitive mammal species is absent from the project site and they are not

expected to occur in the project site. However, five sensitive mammal species were identified as having Low potential to be impacted by the project. Since no sensitive mammals were observed during the field survey and suitable habitat is absent from the project site, including suitable daytime or nighttime roosts for bats, direct impacts to sensitive mammals would not occur.

Indirect impacts to special-status mammals within the vicinity of the project could occur as a result of noise, dust, and increased human presence during project construction. Disturbances related to construction could result in mammals temporarily avoiding the project area; however, similar and more suitable habitats for sensitive mammals are available in the surrounding area. Since no indication of sensitive mammal species were identified during the field survey and the site does not provide suitable habitat for sensitive mammal species, including daytime and nighttime bat roosts, indirect impacts to special-status mammals would be less than significant.

Mitigation Measure

BR-1 Should vegetation removal or construction activities occur during the breeding season for migratory non-game native bird species (February 15 through September 15), nesting bird surveys shall be conducted in order to detect any protected native birds, including loggerhead shrikes, nesting within the construction work area. Surveys shall be conducted weekly, beginning no earlier than 30 days and ending no later than 3 days prior to the commencement of disturbance. If an active nest is discovered, disturbance within a particular buffer shall be prohibited until nesting is complete; the buffer distance shall be determined by the biological monitor in consideration of species sensitivity and existing nest site conditions. Limits of avoidance shall be demarcated with flagging or fencing. Once a flagged nest is determined to be no longer active, the biological monitor shall remove all flagging and allow construction activities to proceed.

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

No Impact. Sensitive natural communities are those that are designated as rare in the region by the CNDDB, support sensitive plant or wildlife species, or receive regulatory protection (i.e., Section 404 of the Clean Water Act [CWA] and/or Sections 1600 et seq. of the CFGC). Rare communities are given the highest inventory priority. [12,13]

[12] Holland, R., *Preliminary Descriptions of the Terrestrial Natural Communities of California*. California Department of Fish and Game, The Resources Agency. 156 pp. 1986.

[13] California Department of Fish and Wildlife, 2010. List of California Terrestrial Natural Communities Recognized by the Natural Diversity Data Base. Natural Heritage Division. The Resources Agency. September.

No riparian habitat or other sensitive natural communities occur within or adjacent to the project site. Implementation of the proposed project would not result in direct or indirect impacts to any riparian habitat or other sensitive natural vegetation communities. Additionally, no sensitive natural communities or sensitive habitats under regulatory jurisdiction of U.S. Army Corps of Engineers (USACE), CDFW, and the Regional Water Quality Control Board (RWQCB) occur in the project site or surrounding area. As a result, no impacts to riparian habitat or other sensitive natural communities would occur.

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

No Impact. The CWA of 1997, as amended, provides for the restoration and maintenance of the physical, chemical, and biological integrity of the nation's waters. The CWA sets up a system of water quality standards, discharge limitations, and permit requirements. Activities that have the potential to discharge dredge or fill materials into jurisdictional waters of the U.S., which include those waters listed in 33 Code of Federal Regulations 328.3 (Definitions), are regulated under Section 404 of the Act, as administered by USACE. Section 401 of the CWA requires a water quality certification from the state for all permits issued by USACE under Section 404 of the CWA. The RWQCB is the state agency in charge of issuing a CWA Section 401 water quality certification or waiver.

The Porter-Cologne Water Quality Control Act (Porter-Cologne) is the basic water quality control law for California and works in concert with the CWA. Under Section 13000 et seq. of Porter-Cologne, the RWQCB is the agency that regulates discharges of waste and fill material within any region that could affect a water of the state (Water Code 13260[a]), (including wetlands and isolated waters) as defined by the California Water Code Section 13050(e). A permit under Porter-Cologne is required prior to a project's implementation, for impacts to water bodies and riparian habitat. Additionally, under Section 1602 of the CFGC, a Streambed Alteration Agreement from CDFW is required prior to any activity that would result in the modification of the bed, bank, or channel of a state stream, river, or lake, including water diversion and damming and removal of vegetation from the floodplain to the landward extent of the riparian zone. This permit governs both activities that modify the physical characteristics of the stream and activities that may affect fish and wildlife resources that use the stream and surrounding habitat (i.e., riparian vegetation or wetlands).

No federally or state-protected wetlands or other waters occur in or adjacent to the project site. As a result, no impacts to such resources would occur.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery/breeding sites?

Less Than Significant Impact. A wildlife migration corridor can be defined as a linear landscape feature of sufficient width and buffer to allow animal movement between two comparatively undisturbed habitat fragments, or between a habitat fragment and some vital resources, thereby encouraging population growth and diversity. A viable wildlife migration corridor consists of more than a path between fragmented habitats but must also include adequate vegetative cover and food sources for transient species, as well as resident populations of less mobile animals to survive. They must be extensive enough to allow for large animals to pass relatively undetected, be free of obstacles, and lack any other distraction that may hinder wildlife passage, such as lights or noise.

The project site is generally disturbed, consisting mostly of weedy ruderal vegetation, and does not serve or function as a wildlife corridor. As a result, direct impacts to a wildlife movement corridor would not occur.

Project construction activities (i.e., increased noise, dust, human presence) would likely result in some wildlife species avoiding the immediate project vicinity; however, such indirect effects would be temporary in nature, and restricted to the project construction time period. Additionally, habitat of similar or better quality surrounds the project site, providing cover and food resources for wildlife that may avoid the project site. Implementing the BMPs listed in Section 1.6 above would further reduce potential impacts to wildlife movement. As a result, indirect impacts to wildlife movement would be less than significant.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

No Impact. The proposed project would not conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No protected trees would be removed or impacted as part of the project. No impact would occur.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. As a LADWP-owned property, the project site falls under LADWP's Owens Valley HCP.[14] It was developed by LADWP as part of the Section 10(a)(1)(B) Endangered Species Act requirements to address the potential incidental take of federally-listed species. The HCP is also intended to serve as the application for an incidental takes permit under State law pursuant to CFGC

[14] Habitat Conservation Plan for Los Angeles Department of Water and Power's Operations, Maintenance, and Management Activities on its Land in Mono and Inyo Counties, California. August 2015.

Section 2081, related to take of a state-listed species. The HCP covers federally and/or state-listed species or otherwise special-status species, including three fish and four bird species (Covered Species). The habitat-based HCP is intended to protect and improve habitat for the Covered Species, while allowing LADWP to continue its operations and maintenance activities (Covered Activities) in the HCP area in a way that minimizes and mitigates impacts to the Covered Species.

As a Covered Activity under the HCP, the proposed project would not conflict with provisions of the HCP. LADWP would comply with the HCP during implementation of the proposed project, and implement any applicable measures identified in the HCP. The project site does not fall under any other approved local, regional, or state habitat conservation plan. As a result, no impact would occur.

V. CULTURAL RESOURCES

Potential impacts to historical and archaeological resources associated with the proposed project were determined from the results presented in the Cultural Resource Assessment (Appendix C) prepared for the proposed project.

Would the project:

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

Less Than Significant Impact. The project area and the cultural resources study area, encompassing a 0.5-mile radius around the proposed project footprint, were examined for previously conducted cultural resources investigations. A records search was conducted in November 2017 at the Eastern Information Center at the University of California, Riverside. The archival research included a review of previously recorded cultural resources listed in the National Register of Historic Places database, the California State Historic Resources Inventory, the California Historical Landmarks Register, California Historical Landmarks Points of Interest, and the list of City of Los Angeles Historic-Cultural Monuments to identify resources within a 0.5-mile radius of the project area. This records search revealed that three pedestrian cultural resource investigations were previously conducted within a 0.5-mile radius of the project site. Approximately 15 percent of the records search area has been previously surveyed. None of these investigations overlap the project footprint.

Six previously recorded resources were identified within the records search area. These resources consist of a prehistoric lithic scatter, two refuse deposits, two canals, and an irrigation culvert and floodgate. All resource locations are located outside of the project footprint; therefore, the proposed project would not result in any impacts to these resources.

The Brockman Landfill was apparently first used in the 1940s and is associated with the post-World War II development of Brockman Corners and Bishop. A historic component of the site consists of refuse deposited between the 1940s and the present. In addition, a historic-age irrigation ditch was observed during the field survey for the project, at the base of the ridge, just within the project site boundary. However, these resources do not meet the criterion for eligibility

eligible for inclusion in the California Register of Historical Resources. In addition, the site has been heavily impacted by recent recreational use and illegal dumping. The proposed project would remove debris from the irrigation ditch, but would not otherwise impact this resource. As such, less than significant impacts would occur.

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

Less Than Significant Impact with Mitigation Incorporated. During the cultural resources field survey, one prehistoric isolate, an obsidian flake, was identified in a disturbed context within the project site. The isolate does not appear to be eligible for listing in the California Register of Historical Resources or National Register of Historic Places. Therefore, the proposed project would not cause a substantial adverse change in the significance of an archaeological resource. Although no significant surface evidence of archaeological resources was identified during the survey, there is potential for unknown subsurface resources to be encountered during ground-disturbing construction activities. As such, mitigation measure CR-1 would be required to ensure that impacts would be less than significant.

Mitigation Measure

CR-1 A qualified archaeological monitor shall be present on-site during ground-disturbing activities including, but not limited to, grading and excavation, as determined in the Phase I Archaeological Assessment. The archaeological monitor shall have the authority to redirect construction equipment in the event that archaeological resources are encountered. If archaeological resources are encountered, work in the vicinity of the discovery shall be halted until the discovery can be evaluated by a qualified archaeologist, in accordance with the provisions of CEQA Section 15064.5. In addition, the on-site archaeological monitor shall conduct worker training prior to the initiation of ground-disturbing activity in order to inform workers of the types of resources that may be encountered and explain the appropriate handling of such resources. Furthermore, any recovered archaeological materials shall be prepared for and curated at the San Bernardino County Museum Curation Facility or other appropriate facility.

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

Less Than Significant Impact. No paleontological resources have been previously encountered during ground disturbing activities, including during maintenance activities at the project site. Therefore, the proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature. Although not expected to occur, in the event previously uncovered paleontological resources are encountered during project construction, the construction manager and/or archaeological monitor would halt

construction activities in the immediate area, in accordance with CEQA Guidelines Section 15064.5(f). LADWP would then retain a qualified paleontological monitor to make an immediate evaluation of the significance and appropriate treatment of the resource. Construction activities may continue on other parts of the construction site while evaluation and treatment of paleontological resources take place, if necessary. Compliance with these existing policies would ensure that the impact to paleontological resources would be less than significant.

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

Less Than Significant Impact with Mitigation Incorporated. There are no known cemeteries located within the project vicinity. Therefore, human remains are not expected to be encountered. However, unknown Native American cultural materials could be encountered during ground disturbance. The implementation of mitigation measure CR-2 would ensure impacts to human remains would be less than significant.

Mitigation Measure

CR-2 A trained Native American consultant shall be obtained to monitor ground-disturbing activities during the construction of the proposed project. In the event human remains are encountered, the Inyo County Coroner shall be contacted. If the coroner determines that the remains are deemed Native American in origin, the coroner shall contact the Native American Heritage Commission and request consultation with a Native American Heritage Commission-appointed Most Likely Descendent pursuant to Public Resources Code Section 5097.98 and California Code of Regulations Section 15064.5.

VI. GEOLOGY AND SOILS

Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The proposed project would not expose people or structures to new adverse effects associated with rupture of a known earthquake fault. The project site is located in an area comprised of a complex, extremely wide zone of unnamed faults in the Volcanic Tableland

North of Bishop.[15] Faults in the Volcanic Tableland generally trend north to northwest and are determined to be sufficiently active and well-defined as directed by the Alquist-Priolo Special Studies Zones Act. However, although the proposed project is located in an Alquist-Priolo Earthquake Fault Zone, the proposed project would not include any habitable structures, and as such, would not expose people or structures to adverse effects, including risk of loss, injury, or death related to the rupture of a known earthquake fault. Therefore, impacts would be less than significant.

ii) Strong seismic ground shaking?

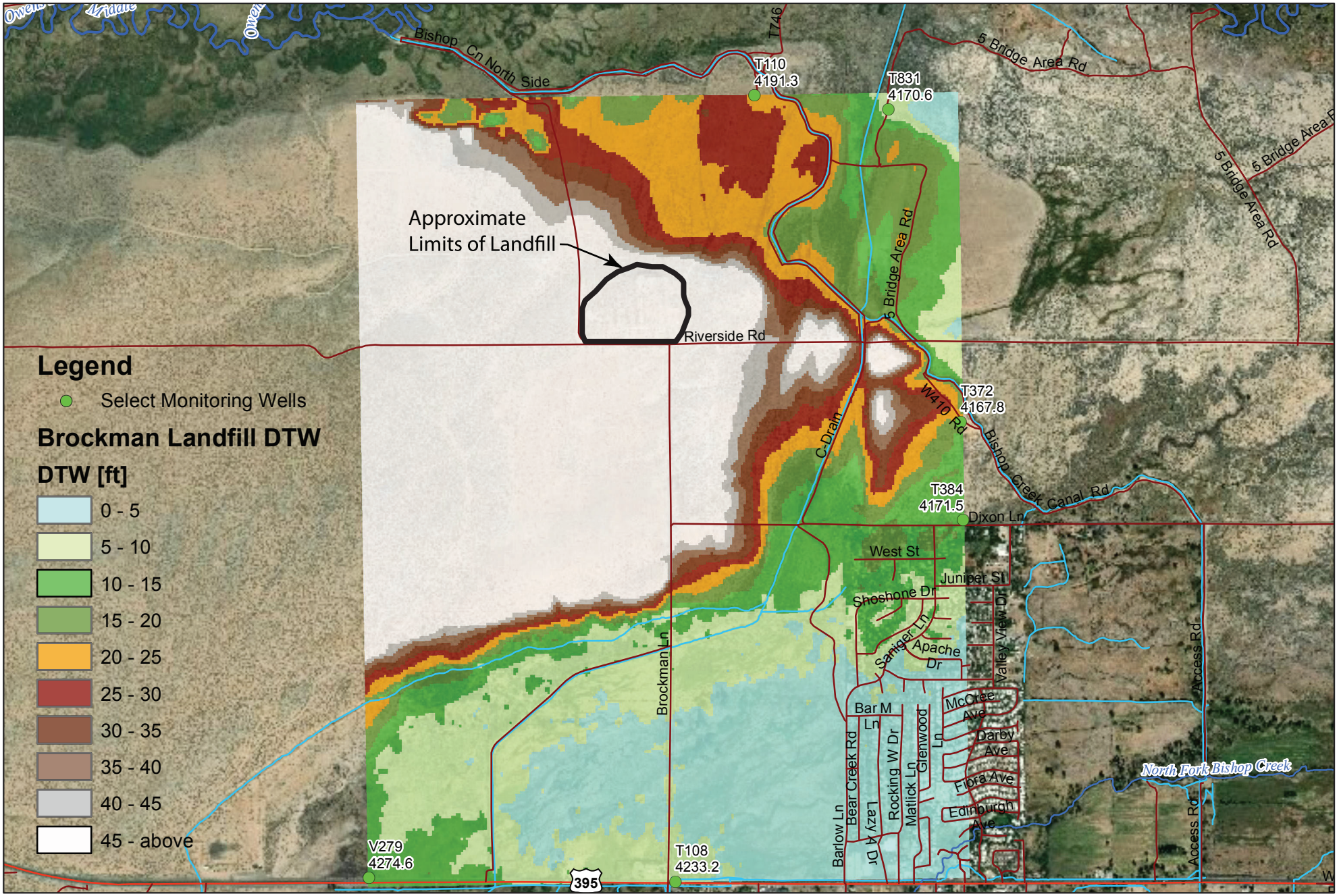
Less Than Significant Impact. The project site is located within a seismically active region and, as with all locations within the area, is subject to strong seismic ground shaking. However, as discussed in Section VI(a)(i) above, although the proposed project is located in an Alquist-Priolo Earthquake Fault Zone, the proposed project would not include any habitable structures. As such, the proposed project would not expose people or structures to adverse effects, including risk of loss, injury, or death related to strong seismic ground shaking. Therefore, impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. The Owens Valley is a basin surrounded by mountain ranges where alluvium has been deposited by fluvial action. Water runoff velocities have been sufficiently slow to allow accumulation of silts and fine sands on the valley floor. The groundwater beneath the valley floor is shallow enough to suggest potential liquefaction concerns.[16] However, LADWP conducted further review and ran a groundwater surface elevation model using surface elevation data and data from the closest monitoring wells to the project site. As shown in Figure 6, the results show that the estimated groundwater depth within the Brockman Landfill site is greater than 45 feet and therefore, would not be an area for liquefaction. Additionally, as previously discussed, the proposed project does not include any habitable structures. As such, the proposed project would not expose people or structures to adverse effects, including risk of loss, injury, or death associated with seismic-related ground failure, including liquefaction. Therefore, impacts would be less than significant.

[15] California Department of Conservation, Division of Mines and Geology, Fault Evaluation report FER-16. Website: http://gmw.conservation.ca.gov/shp/EZRIM/Reports/FER/162/FER_162_Report_19840510.pdf, accessed March 2018.

[16] City of Bishop. General Plan Chapter 10 – Safety. Website: http://www.cityofbishop.com/PublicWorks/Planning/GeneralPlan/Safety.pdf, accessed March 2018.



Source: LADWP Water Operations Division, 2018.

Map not to scale.

Figure 6
Groundwater Depths at Project Site

iv) Landslides?

No Impact. The project site and surrounding area do not contain slopes that would be subject to landslides.[17] Additionally, implementation of the proposed project would not increase the risk of landslides. As previously discussed, the proposed project does not include any habitable structures. As such, the proposed project would not expose people or structures to adverse effects, including risk of loss, injury, or death related to landslides. No impact would occur.

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

Less Than Significant Impact. The proposed project would remediate the project site through waste reconsolidation, landfill cover, final grading, and re-seeding. Scattered surface and near-surface wastes and debris would be collected, placed within the existing landfill area, and subsequently capped with clay and soil. A soil cover would be constructed over a reconsolidated waste prism and the existing landfill. The soil cover would be re-seeded as a method of addressing long-term erosion control and to reduce the potential for erosive forces to expose wastes. Revegetation of the soil cover would help stabilize the soils from wind and stormwater runoff erosion. Excess soil and boulders would be strategically stockpiled around the site perimeter and access roads. After covering, oversized materials would be placed over the cover to provide rock armouring to minimize wind and surface water erosion potential. Long-term measures for erosion control near the cover system include construction of a drainage ditch to promote positive drainage away from the pile. Following completion of the soil cover, the project site would be routinely monitored and maintained to inspect the performance of the soil cover, establishment of vegetation and/or invasive weeds, and the potential for soil erosion or settlement cracking. All work would be conducted in accordance with erosion control BMPs listed in Section 1.6 above. In addition, operation of the proposed project would be similar to existing conditions, and would not result in a substantial increase in erosion or loss of top soil at the project site. With proper implementation of the BMPs during short-term construction and long-term operation of the project, impacts associated with erosion and loss of topsoil would be less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. As discussed in Section VI(a)(iv) above, the project site and surrounding area do not contain slopes that would be subject to landslides. Additionally, the proposed project would not increase the risk of landslide on- or off-site. No impact from landslides would occur.

One of the major types of liquefaction-induced ground failure is lateral spreading of mildly sloping ground. Lateral spreading involves primarily side-to-side movement of earth materials due to ground shaking, and is evidenced by near-vertical cracks or predominantly horizontal movement of the soil mass involved.

[17] California Department of Conservation, Division of Mines and Geology, Landslide Maps. Website: http://www.quake.ca.gov/gmaps/WH/landslidemaps.htm, accessed March 2018.

As discussed in Section VI(a)(iii) above, the groundwater beneath the ~~Owens Valley floor is shallow enough to~~ project site is estimated to be greater than 45 feet. ~~suggest potential liquefaction concerns; however~~ Additionally, the proposed project involves minor construction activities~~,~~ and does not include the construction of any new habitable structures. Therefore, less than significant impacts from lateral spreading would occur.

Subsidence is the lowering of surface elevation due to changes occurring underground, such as extraction of large amounts of groundwater, oil, or gas. When groundwater is extracted from aquifers at a rate that exceeds the rate of replenishment, overdraft occurs, which can lead to subsidence. However, the proposed project does not involve extraction of any groundwater, oil, or gas from the project site. Therefore, impacts from subsidence would not occur.

Collapsible soils consist of loose dry materials that collapse and compact under the addition of water or excessive loading. Collapsible soils are prevalent throughout the southwestern United States, specifically in areas of young alluvial fans. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. The project area does contain alluvium; however, the proposed project involves minor construction activities, and does not include the construction of any new habitable structures. Therefore, impacts from collapsible soils would be less than significant.

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

No Impact. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (lessen in volume) as water is drawn away. If soils consist of expansive clay, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area. The project site contains alluvium, which contains deposits of sand, gravel, silt, and clay.[18] Therefore, the project site does contain some clay-based soils that have the potential to be expansive. However, the project involves minor construction activities and does not include the construction of any new habitable structures. Therefore, no impact would occur.

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

No Impact. The proposed project would remediate the Brockman Lane Disposal Site and would not involve the use of septic tanks or alternative wastewater disposal systems as part of the project. Therefore, no impact associated with the use of such systems would occur.

[18] United States Geological Survey, California Geological Survey, Southern California Geology Alluvial Deposits. Website: http://geomaps.wr.usgs.gov/archive/scamp/html/scg_surf_alluv.html, accessed March 2018.

VII. GREENHOUSE GAS EMISSIONS

Potential impacts to greenhouse gases associated with the proposed project were determined from the results presented in the Greenhouse Gases Technical Memorandum prepared for the proposed project (see Appendix D).

Would the project:

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

Less Than Significant Impact. Greenhouse gas (GHG) emissions refer to a class of pollutant emissions that are generally understood to affect global climate conditions due to their long atmospheric lifetimes and ability to trap infrared heat energy in the atmosphere that is radiating from the Earth's surface, known as the greenhouse effect. The most prevalent anthropogenic GHG compounds are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). The presence of these gases and other GHG compounds in the atmosphere maintains global surface temperatures at generally habitable levels. Of all the GHG compounds, CO_2 is the most abundant gas that contributes to climate change, especially through fossil fuel combustion. The other GHG compounds are less abundant but have a higher potential to affect climate change on a per-mass basis. To account for the higher global warming potential, GHG emissions are commonly expressed in the equivalent mass of CO_2, denoted as CO_2e.

Anthropogenic emissions of CO_2, CH_4, and N_2O have resulted in atmospheric concentrations in excess of natural ambient levels that are responsible for intensifying the greenhouse effect. In acknowledgement of the environmental consequences of the amplified greenhouse effect, regulations have been adopted at international, federal, state, regional, and local levels to control GHG emissions. GHG emissions associated with implementation of the proposed project are evaluated in the context of applicable regulations aimed at reducing GHG emissions. The proposed project is not located within a metropolitan planning organization for which a regional transportation plan has been prepared. This analysis considers GHG emissions associated with implementation of the proposed project with respect to statewide and local (Inyo County) policies.

The atmospheric effects of GHG emissions are borne globally and are cumulative in nature, and the direct effect of an individual project's GHG emissions on the environment cannot be delineated precisely. Regulations adopted to control and reduce GHG emissions generally take a holistic approach and consider a variety of sources and strategies to achieve their objectives. Due to the long atmospheric lifetimes of GHG emissions, the assessment of environmental impacts characterizes GHG emissions associated with implementation of the proposed project in terms of annual emissions of metric tons of CO_2e ($MTCO_2e$). GHG emissions that would be generated by construction and operation of the proposed project are analyzed together.

Construction would generate GHG emissions through the use of heavy-duty equipment and vehicle trips for workers and material hauling to and from the project site. Annual GHG emissions were estimated using the CalEEMod, Version 2016.3.2, which is the preferred regulatory model for quantifying GHG

and air pollutant emissions associated with CEQA land use development projects. The emissions modeling exercise incorporated conservative assumptions that 20 construction workers would report to the site every day and that all required equipment would be used continuously for eight hours per day. Construction of the proposed project was determined by LADWP to persist for approximately nine months beginning in Spring 2019.

Following the completion of construction activities, operations would involve routine maintenance activities to ensure that the soil cover is achieving the desired objective of stabilizing existing wastes and minimizing the future exposure risks to public health. Operations would not introduce significant new sources of GHG emissions into the project area. Operational activities would be similar to existing conditions on the project site. Therefore, the emissions modeling exercise did not quantify any GHG emissions associated with operations as the LADWP determined that no additional maintenance staff or haul truck trips would be required. Project-related GHG emissions would be limited to air pollutants generated by heavy-duty equipment and vehicles during the construction period and would cease thereafter.

Table 2 displays the results of the GHG emissions analysis for heavy duty construction equipment and vehicle trips during construction activities, expressed in $MTCO_2e$. Construction would generate GHG emissions in 2019 totaling approximately 658.4 $MTCO_2e$. Neither the LADWP nor the Great Basin Unified APCD for the project area have established officially adopted quantitative GHG emissions thresholds applicable to construction activities. The GHG emissions associated with construction of the proposed project would cease entirely upon completion of construction activities. There would be no long-term operational sources of GHG emissions.

Table 2: Estimated GHG Emissions

Source Category	Annual Emissions ($MTCO_2e$)
Construction Equipment	555.6
Vehicle Trips	102.8
Total	**658.4**
SMAQMD Construction Threshold (Informational)	1,100
Exceed Informational Threshold?	**No**

Note: Emissions modeling files can be found in Appendix D.
Source: Terry A. Hayes Associates Inc., 2018.

Statewide, the most conservative quantitative annual threshold for GHG emissions resulting from construction projects is propagated by the Sacramento Metropolitan Air Quality Management District (SMAQMD). Through extensive regional modeling, the SMAQMD determined that construction activities for CEQA projects within its jurisdiction may generate up to 1,100 $MTCO_2e$ annually as a screening threshold without having to identify GHG emissions reduction strategies. The GHG emissions inventory within the SMAQMD jurisdiction is substantially greater than that within the Great Basin Unified APCD. Therefore, using the SMAQMD threshold as a comparative metric for analyzing GHG emissions associated with construction represents a conservative characterization of environmental impacts. As shown in Table 2 above, GHG

emissions would be below the most conservative quantitative metric for GHG emissions.

Furthermore, the LADWP is headquartered in Los Angeles, California, which is within the regional jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD has promulgated its own CEQA Air Quality Significance Thresholds, which include an annual operational threshold of 10,000 $MTCO_2e$ for industrial projects for which the SCAQMD is the lead agency. SCAQMD guidance recommends that GHG emissions associated with construction activities be amortized over a 30-year operational period to characterize long-term impacts. When amortized over a 30-year period, construction of the proposed project would generate approximately 21.9 $MTCO_2e$ annually. This quantity represents only 0.2 percent of the allowable SCAQMD threshold.

Based on the above analyses, the proposed project would result in a less than significant impact related to GHG emissions.

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

Less Than Significant Impact. Plans, policies, and regulations adopted to reduce GHG emissions generally focus on long-term sources of GHG emissions that provide opportunities for life-cycle improvements in efficiency and sustainability. The proposed project is located in an Isolated Rural area outside of any metropolitan planning organization area, and therefore a consistency analysis with a regional transportation plan is not applicable. Furthermore, the statewide California Air Resources Board programs that mandate improvements in fuel and engine efficiencies over time are not directly related to the proposed project. Implementation of the proposed project would not introduce a new permanent source of GHG emissions into the project area, and GHG emissions resulting from construction activities would cease entirely following completion of the soil cover on the project site. As discussed previously, construction of the proposed project would not generate GHG emissions of sufficient quantities to approach any quantitative CEQA threshold throughout the state. Therefore, the proposed project would result in a less than significant impact related to GHG plans, policies, and regulations.

VIII. HAZARDS AND HAZARDOUS MATERIALS

The project site has been identified by CalRecycle as a pre-regulation burn dump, all of which were phased out in the early 1970s to meet new air quality regulations. Burn dump sites are typically classified as solid waste disposal sites and are inspected by the local enforcement agency. Although the prescriptive cover standards of the California Code of Regulations Title 27 does not apply for pre-regulation sites, the local enforcement agency may apply certain closure regulations on an as-needed basis, per Section 21100 for the protection of public health and safety and the environment. The local enforcement agency determined that the project site was out of compliance due to exposed waste, as such, required a corrective measure that would protect public health and safety. Because these sites were created prior to

regulations, landowners are required to maintain state minimum standards at these locations.

In addition, soil samples were analyzed for metals by EPA 6010B using deionized water to test the solubility of metals under existing conditions. The deionized water simulates stormwater conditions leaching through the waste. The data shows that under existing conditions, it is unlikely that metals would leach and impact groundwater or surface water. Please note that metals concentrations obtained by EPA 6010B – waste extraction test – soluble threshold limit concentration (STLC) uses an acid to simulate reducing conditions for evaluating options for disposal to an appropriate facility for clean closure.

The proposed project would meet the state minimum standards for landfills of this type through recycling, waste reconsolidation, grading, placement of soil cover, and incorporation of drainage and erosion control features that would also benefit water quality similar to other burn dump projects recently completed, including the Old Red Bluff Landfill in Tehama County and Mira Loma Landfill in Riverside County. Only certain areas of exposed wastes would be relocated in other waste areas to improve drainage and slope features. Similar to the Old Red Bluff Landfill, the site is designated as open space and no sensitive land uses are proposed. Clean closure of the site is not anticipated.

CalRecycle has consulted with the California Department of Toxic Substances Control (DTSC) regarding the proposed project. DTSC concurred with CalRecycle's proposed remediation of the facility given its site specific conditions and land use and declined further review and guidance on the design on the project.

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Implementation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The proposed project would remediate the project site through waste reconsolidation of debris, landfill cover, final grading, and re-seeding within the project area. Scattered surface and near-surface wastes and debris would be collected, placed within the existing landfill area, and subsequently capped with clay and soil. Covering the site wastes with a soil cover would help reduce the potential for scavenging, direct human contact, vectors, and wind-blown or stormwater runoff transported litter. Construction activities would be temporary in nature and in addition to the transport of landfill debris and wastes, would involve the limited transport, storage, use, and disposal of hazardous materials. Such hazardous materials could include on-site fueling/servicing of construction equipment, and the transport of fuels, lubricating fluids, and solvents. Recyclables and residual wastes would also be transported to the appropriate permitted facility. These types of materials are not acutely hazardous, and all storage, handling, and disposal of these materials are regulated by the ~~California Department of Toxic Substances Control~~ DTSC, United States Environmental Protection Agency, the Occupational Safety & Health Administration, the Inyo County Fire Department, and the Inyo County Health Department. The transport, use, and disposal of

construction-related hazardous materials would occur in conformance with applicable federal, State, and local regulations governing such activities. Therefore, the short-term construction impact would be less than significant.

Long-term operation of the proposed project would not involve the transport, storage, use, or disposal of hazardous materials. Additionally, the proposed project would not generate industrial wastes or toxic substances during operation. Therefore, project operation would not pose a significant hazard to the public or the environment. No operational impact related to hazardous materials would occur.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. The remediation of the project site through waste reconsolidation of debris, landfill cover, final grading, and re-seeding within the project area would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As discussed in Section VIII(a) above, scattered surface and near-surface wastes and debris would be collected, placed within the existing landfill area, and subsequently capped with clay and soil. Covering the site wastes with a soil cover would help reduce the potential for scavenging, direct human contact, vectors, and wind-blown or stormwater runoff transported litter. Additionally, construction activities may involve limited transport, storage, use, or disposal of some hazardous materials, such as on-site fueling/servicing of construction equipment, and the transport of fuels, lubricating fluids, and solvents. Recyclables and residual wastes would also be transported to the appropriate permitted facility. These types of materials are not acutely hazardous, and compliance with existing federal, State, and local regulations would ensure that construction impacts related to reasonably foreseeable upset accident conditions involving the release of hazardous materials would be less than significant.

As discussed previously, the long-term operation of the proposed project would not involve the use of any hazardous materials. No operational impact would occur.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?

No Impact. The project site is located on LADWP property northwest of Bishop. There are no schools located within one-quarter mile of the project site. The nearest school is Bishop Elementary School, located approximately 2.5 miles southeast of the project site. Further, the proposed project would not emit hazardous emissions or handle acutely hazardous materials. No impact would occur.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. The project site is not included on any hazardous waste site lists including the Department of Toxic Substances Control's EnviroStor database, the State Water Resources Control Board's GeoTracker site, the Cortese list, the Superfund Site list, or other lists compiled pursuant to Section 65962.5 of the Government Code.[19,20,21,22] As such, the proposed project would not create a significant hazard to the public or the environment, and no impact would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The project site is not located within two miles of a public airport or within an airport land use plan.[23] The nearest public use airport is Bishop Airport, also known as Eastern Sierra Regional Airport, located approximately 3.2 miles southeast of the project site.[24] As such, the proposed project would not result in a safety hazard for the people residing or working in the project area related to a nearby airport. No impact would occur.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The project site is not located within the vicinity of a private airstrip. The nearest private airstrip is the Inyo County Sheriff Search and Rescue Heliport; an unattended heliport located approximately 4.1 miles southeast of the project site. The airstrip is listed as being suitable for emergency use only.[25] As such, the proposed project would not result in a safety hazard for people residing or working in the project area related to a nearby private airstrip. No impact would occur.

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

No Impact. The project site is not included in an adopted emergency response plan or emergency evacuation plan of Inyo County. No temporary or permanent road closures would occur as part of the proposed project. Additionally, project-generated traffic during construction and operation would be minimal. Furthermore, LADWP employs an on-site emergency response plan, which would be revised as required to address project construction. Therefore, no impact to emergency response plans would occur.

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19 California Department of Toxic Substances Control, *EnviroStor Database*, Search by Map Location. Website: http://www.envirostor.dtsc.ca.gov/public/, accessed March 2018.

20 California State Water Resources Control Board, GeoTracker Database, Search by Map Location. Website: http://geotracker.waterboards.ca.gov/, accessed March 2018.

21 California Department of Toxic Substances Control, *DTSC's Hazardous Waste and Substances Site List – Site Cleanup (Cortese List)*. Website: http://www.calepa.ca.gov/sitecleanup/corteselist/, March 2018.

22 United States Environmental Protection Agency, *National Priorities List*, All cleanup sites by state. Website: http://www.epa.gov/region9/superfund/superfundsites.html, accessed March 2018.

23 Airnav.com, Airports Search by Location. Website: http://www.airnav.com/airports/get, accessed March 2018.

24 Airnav.com, Bishop Airport. Website: http://www.airnav.com/airport/KBIH, accessed March 2018.

25 Airnav.com, Inyo County Sheriff Search and Rescue Heliport. Website: http://www.airnav.com/airport/4CL7, accessed March 2018.

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

Less Than Significant Impact. The project site is not located adjacent to urbanized or residential areas. Additionally, the proposed project does not involve the construction of any new habitable structures. During construction, workers would have fire-suppression equipment (such as fire extinguishers) available on-site to respond to the accidental ignition of a fire. Therefore, the impact would be less than significant.

IX. HYDROLOGY AND WATER QUALITY

Would the project:

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

Less Than Significant Impact. Construction activities would result in the disturbance of soil and vegetation on the project site. The proposed project would screen, sort, recycle, and reconsolidate surface and near surface debris within the project area. Recyclables and wastes that are not readily compactible would be hauled to appropriate permitted facilities for final disposal. Surface and near surface waste that could not be recycled would be reconsolidated over the existing landfill area. A soil cover would be constructed over the reconsolidated waste prism and existing landfill to enhance drainage conditions and to reduce the potential for future litter production. The existing landfill and the waste reconsolidation area would be graded then covered with at least two feet of clean fill soils derived from on-site borrow areas. The cover soil would be moisture conditioned and compacted to minimize future erosion. The soil cover grades would match current grades and be constructed to provide positive drainage off the cover system. It is estimated that approximately 17,000 cubic yards of compacted in-place soil would be required. The waste excavation would be screened and suitable soil would be used as cover material. In addition, approximately 2,000 cubic yards of soil would be excavated for the drainage ditch. A majority of the soil screened from the soil berms would be suitable for use as cover material. Excess soil would be strategically stockpiled around the site perimeter to discourage illegal dumping. If the soil from the berms is unsuitable for cover material, a sufficient quantity of cover soil could be generated through strategic grading to promote drainage.

Additionally, the soil cover would be re-seeded as a method of addressing long-term erosion control and to reduce the potential for erosive forces to expose wastes. Revegetation of the soil cover would help stabilize the soils from wind and stormwater runoff erosion. After covering, oversized materials would be placed over the cover to provide rock armouring to minimize wind and surface water erosion potential, all disturbed disposal and soil borrow areas would be re-seeded, and stormwater BMPs would be installed to further reduce future erosion potential. Long-term measures for erosion control near the cover system include construction of a drainage ditch to promote positive drainage away from the pile. The drainage ditch would also be re-seeded. In addition to the drainage ditch, straw wattles would be installed on the slopes every five vertical feet on contour and maintained until the vegetation is established.

As discussed in Section VIII above, soil samples were analyzed for metals by EPA 6010B using deionized water to test the solubility of metals under existing conditions. The deionized water simulates stormwater conditions leaching through the waste. The data shows that under existing conditions, it is unlikely that metals would leach and impact groundwater or surface water. Please note that metals concentrations obtained by EPA 6010B – waste extraction test – soluble threshold limit concentration (STLC) uses an acid to simulate reducing conditions for evaluating options for disposal to an appropriate facility for clean closure.

Furthermore, LADWP would coordinate with the Lahontan Regional Water Quality Control Board to obtain a Waste Discharge Requirement. In addition, LADWP will obtain a Statewide Construction Storm Water Permit and the proposed project would implement structural and nonstructural BMPs and erosion control measures. As discussed in Section 1.6 above, these measures may include, but not be limited to, minimizing the extent of disturbed areas and duration of exposure, retaining sediment within the construction area, as well as the use of silt fences, and temporary soil stabilization as necessary. Implementation of the structural and nonstructural BMPs would reduce sediment-laden runoff, prevent the migration of contaminants to and within surface waters, and ensure that stormwater discharges would not violate applicable water quality standards. Therefore, short-term construction impacts on water quality would be less than significant.

Long-term operation of the proposed project would include routine monitoring and maintenance to inspect the performance of the soil cover, establishment of vegetation, and the potential for soil erosion or settlement cracking. Periodic maintenance activities may be required to control invasive weed species, replant vegetation, or repair localized soil erosion or differential settlement cracks. Therefore, project operation would not violate applicable water quality standards. No operational impacts related to water quality would occur.

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

No Impact. The proposed project would screen, sort, recycle, and reconsolidate surface and near surface debris within the project area, then install a soil cover system to enhance site drainage. As such, the proposed project would not affect, deplete, or interfere with groundwater supply. Therefore, no impact to groundwater supply and recharge would occur.

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

Less Than Significant Impact. As discussed in Section IX(a), the proposed project would screen, sort, recycle, and reconsolidate surface and near surface

debris within the project area, then install a soil cover system to enhance site drainage. During the construction phase, the proposed project would implement structural and nonstructural BMPs, which would minimize short-term construction impacts of erosion and siltation. Short-term construction impacts would be less than significant.

During operation of the proposed project, routine monitoring and periodic maintenance to inspect or repair the performance of the soil cover, establishment of vegetation, and for soil erosion or settlement cracking would occur. Therefore, long-term operational impacts would be less than significant.

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

Less Than Significant Impact. As discussed in Section IX(a) above, the proposed project would screen, sort, recycle, and reconsolidate surface and near surface debris within the project area, then install a soil cover system to enhance site drainage. In addition to the proposed project, BMPs would be implemented to control runoff from the project site during construction. Therefore, no flooding is expected to occur on- or off-site during construction. The impact would be less than significant during construction.

Operation of the proposed project would include routine monitoring and periodic maintenance. As such, project implementation would not result in a substantial increase in the rate of flow and would not result in flooding. Therefore, the impact would be less than significant during operations.

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As discussed in Section IX(a) above, the proposed project would screen, sort, recycle, and reconsolidate surface and near surface debris within the project area, then install a soil cover system to enhance site drainage. Additionally, BMPs would be implemented to control runoff from the project site during the construction phase. Implementation of the proposed project and BMPs would ensure that construction impacts would be less than significant.

Operation of the proposed project would include routine monitoring and periodic maintenance would not generate polluted runoff. No impact would occur during project operations.

f) Otherwise substantially degrade water quality?

Less Than Significant Impact. As described in Section IX(a) previously, the proposed project would screen, sort, recycle, and reconsolidate surface and near surface debris within the project area, then install a soil cover system to enhance site drainage. LADWP would also implement structural and nonstructural BMPs to control runoff from the project site during construction. Therefore, the short-term construction impact would be less than significant. Additionally, as

discussed in Section IX(e) above, operation of the proposed project would not generate polluted runoff. No operational impact would occur.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. The project site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency. The project site is located within an area of minimal flood hazard (Zone X).[26] Further, no housing is proposed to be constructed as part of the proposed project. No impact would occur.

h) Place within a 100-year flood area structures to impede or redirect flood flows?

No Impact. As discussed in Section IX(g) above, the project site is not located in a 100-year flood hazard area as mapped by the Federal Emergency Management Agency.[27] No impact would occur.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less Than Significant Impact. The proposed project would remediate the project site through waste reconsolidation, landfill cover, final grading, and re-seeding. As discussed in Section IX(a), implementation of the proposed project and BMPs would not result in a substantial increase in runoff such that flooding would occur. The impact would be less than significant.

j) Inundation by seiche, tsunami, or mudflow?

No Impact. Seiches are oscillations generated in enclosed bodies of water usually as a result of earthquake related ground shaking. The project site is not located near any enclosed water bodies or in an area in which a seiche could form. No impact would occur.

Tsunamis are large ocean waves caused by the sudden water displacement that results from an underwater earthquake, landslide, or volcanic eruption. Tsunamis affect low-lying areas along the coastline. The project site is located hundreds of miles from the Pacific Ocean and would not be subject to a tsunami. No impact would occur.

As discussed in Section VI(a)(iv) above, the project site is not subject to landslides. As a result, the project site as not subject to mudflows. Therefore, no impact would occur.

[26] Federal Emergency Management Agency, Flood Insurance Rate Map Inyo County, California, 2011. Website: https://msc.fema.gov/portal/search#searchresultsanchor, accessed March 2018.

[27] *Ibid.*

X. LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact. The proposed project would not divide an established community. The project site is located on LADWP property, northwest of the City of Bishop. Construction and operational activities would not occur outside the project site boundaries and no roads within the project vicinity would require closure. No separation of uses or disruption of access between land use types would occur as a result of the proposed project. No impact would occur.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The project site is located within LADWP property. The project site and surrounding area is zoned as OS (Open Space) and is designated as Natural Resources (NR) in the Inyo County General Plan.[28] The proposed project would remediate the project site by screening, recycling, and reconsolidating surface and near surface debris within the project area, as well as re-seeding and restricting access to the site. No new land uses would be introduced into the project site. After construction, the project site would be operated by LADWP similar to existing conditions. Therefore, the proposed project would not conflict with the existing zoning or General Plan designations for the project site. No impact would occur.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. As discussed in Section IV(f) above, the project site is located within LADWP's Owens Valley HCP. The habitat-based HCP is intended to protect and improve habitat for the Covered Species, while allowing LADWP to continue its Covered Activities in the HCP area in a manner that minimizes and mitigates impacts to the Covered Species. As a Covered Activity under the HCP, the proposed project would not conflict with provisions of the HCP. LADWP would comply with the HCP during implementation of the proposed project, and implement any applicable measures identified in the HCP. No new areas would be subject to disturbance. Additionally, no natural community conservation plan applies to the project site. Therefore, the proposed project would not conflict with any habitat conservation plan or natural community conservation plan. No impact would occur.

[28] Inyo County GIS Data, Information Services Department Interactive Mapping, available at: https://inyocounty.maps.arcgis.com/apps/webappviewer/index.html?id=f3db09212fcf4d5eb0beee16f26e040c, accessed March 2018.

XI. MINERAL RESOURCES

Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. According to the State of California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, there are no oil, gas, geothermal or other known wells located on or in the vicinity of the project site.[29] The project site is not mapped as or known to contain an important mineral resource.[30] Therefore, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. No impact would occur.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The project site is not delineated as a locally-important mineral resource recovery site in the Inyo County General Plan.[31] Further, no active oil wells exist on or in the vicinity of the project site. Therefore, implementation of the proposed project would not result in the loss of availability of a locally-important mineral resource recovery site, and no impact would occur.

XII. NOISE

Potential impacts to noise associated with the proposed project were determined from the results presented in the Noise Technical Memorandum prepared for the proposed project (see Appendix E).

The standard unit of measurement for noise is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The A-weighted scale, abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA.

This noise analysis discusses sound levels in terms of Equivalent Noise Level (Leq). Leq is the average noise level on an energy basis for any specific time period. The Leq for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. Leq can be thought of as the level of a continuous noise which has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or "point source," decreases by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such

[29] State of California Department of Conservation Division of Oil, Gas, and Geothermal Resources – Well Finder, available at: https://maps.conservation.ca.gov/doggr/wellfinder/#close, accessed March 2018.

[30] State of California Department of Conservation Data Viewer, available at: https://maps.conservation.ca.gov/cgs/DataViewer/index.html#, accessed March 2018.

[31] Inyo County Planning Department, General Plan Conservation/Open Space Element, available at: http://inyoplanning.org/documents/Chapter6-ConservationandOpenSpace.pdf. May 2013.

as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt, grass, or scattered bushes and trees) for each doubling of the distance. For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, then the noise level is 83 dBA at a distance of 100 feet from the noise source, and 77 dBA at a distance of 200 feet.

Noise generated by a mobile source decreases by approximately 3 dBA over hard surfaces and 4.8 dBA over soft surfaces for each doubling of the distance. Generally, noise is most audible when the source is in a direct line-of-sight of the receiver. Barriers, such as walls, berms, or buildings that break the line-of-sight between the source and the receiver greatly reduce noise levels from the source since sound can only reach the receiver by bending over the top of the barrier. However, if a barrier is not sufficiently high or long to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.

Studies have shown that the smallest perceptible change in sound level for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and may evoke a community reaction. A 10-dBA increase is subjectively heard as a doubling in loudness and would likely cause a negative community reaction.

Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of applicable standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. The project site is located in a rural environment with few substantial sources of noise. It is anticipated that audible noise includes occasional traffic and aircraft flyovers. The nearest sensitive receptors are residences located approximately 0.7 miles (3,700 feet) southeast of the Project site in the City of Bishop. In 2017, Terry A. Hayes Associates Inc. completed noise measurements in a similar rural environment for the LADWP Fairmont Treatment Plant Project. Those noise measurements indicate that rural noise levels typically range from 47.7 to 55.1 dBA Leq.

The Inyo County Code and General Plan include noise standards and policies related to construction. Section 12.16.110 (Loud Noises Prohibited) of Code establishes prohibitions against nuisance noise. The General Plan states that construction activity should implement noise-reducing mitigation measures when residential uses or other sensitive receptors are located within 500 feet (Policy NOI-7).

Noise impacts from construction of the proposed project would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. Construction activities typically require the use of numerous pieces of noise-generating equipment. Typical noise levels from various types of equipment that would be used during construction are listed in Table 3. Noise levels from individual pieces of equipment typically are between 70.3 and 81.0 dBA Leq at a distance of 50 feet. However, the proposed project is

located approximately 3,700 feet away from the nearest receptor and construction noise would not be audible at this distance.

Table 3: Noise Level Ranges of Typical Construction Equipment

Construction Equipment	Noise Level at 50 feet (dBA)
Dozer	77.7
Dump Truck	72.5
Excavator	76.7
Water Truck	70.3
Grader	81.0

Source: FHWA, *Roadway Construction Noise Model*, Version 1.1, 2008.

In addition to on-site construction activities, noise would be generated off-site by construction-related trucks and construction worker vehicles. Construction trucks generate higher noise levels than construction worker-related traffic. For example, one heavy-duty truck, traveling 35 miles per hour, generates the equivalent noise of 31 passenger vehicles.[32] The proposed project would require 500 haul truck trips (1,000 one-way trips) for export of materials from the project site over a nine month period. There would be approximately 20 construction employee trips for each starting and ending hour. The California Department of Transportation has stated that a doubling of traffic volumes is needed to audibly increase mobile source noise levels over a sustained period. It is not anticipated that the proposed project would cause a doubling of traffic on roadways in front of noise-sensitive land uses.

Based on the above analysis, the proposed project would not generate on- or off-site construction noise that could conflict with noise standards. Therefore, the proposed project would result in a less than significant impact related to construction noise.

During operation, the project site would be routinely monitored and maintained to inspect the performance of the soil cover, establishment of vegetation and/or invasive weeds, and the potential for soil erosion or settlement cracking. Periodic maintenance activities may be required to control invasive weed species, replant vegetation, or repair localized soil erosion or differential settlement cracks. Vehicle trips related to periodic maintenance would not audibly change existing noise levels at the nearest residential land uses due to the distance between the landfill and the residences. The proposed project would not generate operational noise that could conflict with noise standards. Therefore, the proposed project would result in a less than significant impact related to operational noise.

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

Less Than Significant Impact. Construction activities can generate varying degrees of vibration, depending on the procedure and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings

[32] California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013.

located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, and to slight damage at the highest levels. In most cases, the primary concern regarding construction vibration relates to damage.

The Federal Transit Administration provides vibration levels for various types of construction equipment with an average source level reported in terms of velocity.[33] Construction activity would utilize equipment that is best characterized in Table 4 by large bulldozers. A large bulldozer produces a vibration level of 0.089 inches per second at 25 feet. Vibration is a localized event typically perceptible within 25 feet or less from construction equipment. The nearest receptor is located approximately 3,700 feet away and vibration generated at the project site would not be perceptible at this land use. Therefore, the proposed project would result in a less than significant impact related to on-site construction vibration.

Table 4: Vibration Levels for Construction Equipment

Equipment	Vibration Level at 25 feet (Inches/Second)
Large Bulldozer	0.089
Loaded Trucks	0.076
Small Bulldozer	0.003

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

In addition to on-site construction activities, construction trucks on the roadway network have the potential to expose vibration-sensitive land uses. The Federal Transit Administration has stated that rubber-tired vehicles, including trucks, rarely generate perceptible vibration.[34] It is not anticipated that project-related trucks would generate perceptible vibration adjacent to the roadway network. Therefore, the proposed project would result in a less than significant impact related to off-site construction vibration.

During operation, the project site would be routinely monitored and maintained to inspect the performance of the soil cover, establishment of vegetation and/or invasive weeds, and the potential for soil erosion or settlement cracking. Periodic maintenance activities may be required to control invasive weed species, replant vegetation, or repair localized soil erosion or differential settlement cracks. Vehicle trips related to periodic maintenance would not generate perceptible vibration at the nearest residential land uses due to the distance between the landfill and the residences. Therefore, the proposed project would result in a less than significant impact related to operational vibration.

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

Less Than Significant Impact. Following the completion of construction, the project site would be routinely monitored and maintained to inspect the

[33] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

[34] Ibid.

performance of the soil cover, establishment of vegetation and/or invasive weeds, and the potential for soil erosion or settlement cracking. Periodic maintenance activities may be required to control invasive weed species, replant vegetation, or repair localized soil erosion or differential settlement cracks. Vehicle trips related to periodic maintenance would not audibly change existing noise levels at the nearest residential land uses due to the distance between the project site and the nearest residences. Therefore, the proposed project would result in a less than significant impact related to permanent operational noise.

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

Less Than Significant Impact. As previously discussed, the nearest sensitive receptor is located approximately 3,700 feet away and project construction noise would not be audible at this distance. Project-related constriction traffic would not double roadway volumes thereby changing mobile source noise levels at sensitive land uses. Therefore, the proposed project would result in a less than significant impact related to a substantial temporary or periodic increase in ambient noise levels related to off-site vehicle noise.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is not located within an airport land use plan area nor is it located two miles of a public airport or private airstrip. The nearest public use airport to the project site is the Bishop Airport, located approximately 3.4 miles to the southeast. Therefore, the proposed project would not result in an impact related airport or airstrip noise. No impact would occur.

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

No Impact. As previously discussed, the project site is not located in the vicinity of a private airstrip. Furthermore, the proposed project would not include occupied facilities that would expose people to excessive noise levels related to aircraft use. Therefore, no impact would occur.

XIII. POPULATION AND HOUSING

Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. The proposed project does not include any residential or commercial land uses and, therefore, would not result in a direct population increase from construction of new homes or businesses. The proposed project involves remediating the project site through waste reconsolidation, landfill cover, final

grading and re-seeding. Therefore, the proposed project would not result in indirect population growth, and no impact would occur.

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

No Impact. No residential uses currently exist on the project site; therefore, the proposed project would not require the removal of existing housing. Neither construction nor operation of the proposed project would impact the number or availability of existing housing in the area, and construction of replacement housing would not be necessary. Therefore, no impact to housing would occur.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. As discussed in Section XIII(b) above, there are currently no residential uses on the project site. As such, no persons would be displaced as a result of implementation of the proposed project. Construction of replacement housing would not be necessary. No impact would occur.

XIV. PUBLIC SERVICES

Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i) Fire protection?

No Impact. The project does not propose new or physically altered fire protection facilities, nor propose any new buildings and residences that could increase the need for fire protection services. The project involves remediation of the project site. Construction and operation of the proposed project would include the screening, sorting, recycling, and reconsolidating surface and near surface debris at the project site. Additionally, no road closures would be required during the construction phase. Project implementation is not anticipated to affect response times of the local fire department to the project site or surrounding vicinity or require construction of new or physically altered fire protection facilities. No impacts related to fire protection would be expected.

ii) Police protection?

No Impact. As previously discussed, the proposed project would not generate population growth. Therefore, construction and operation of the proposed project would not require additional police protection services or facilities. No impact to police protection services would occur.

iii) Schools?

No Impact. The proposed project does not include construction of new residences that generate increases in student population nor does the project propose new or physically altered school facilities. Thus, no impact to schools would occur.

iv) Parks?

No Impact. Residential development typically has the greatest potential to result in impacts to parks since these types of developments generate a permanent increase in residential population. As stated previously, the proposed project does not include development of any residential uses and would not generate any new permanent residents that would increase the demand for local and regional park facilities. Therefore, no impact to parks would occur.

v) Other public facilities?

No Impact. The proposed project does not include development of residential or commercial uses and would not increase the demand for other public facilities. Additionally, the proposed project would not result in indirect population growth, which would increase demand for other public facilities. No impact to other public facilities would occur.

XV. RECREATION

Would the project:

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. The proposed project would remediate the project site through waste reconsolidation of debris, landfill cover, final grading, and re-seeding. Neither construction nor operation of the proposed project would generate new permanent residents that would increase the use of existing parks and recreational facilities. Additionally, the project site is a landfill and is not used for recreational purposes. Therefore, substantial physical deterioration of these facilities would not occur or be accelerated with implementation of the proposed project. No impact would occur.

b) Include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The proposed project does not include development of any residential uses and, thus, would not generate new permanent residents that would increase the demand for recreational facilities. Further, the remediation of the project site would not have the capacity to promote or indirectly induce new development that would require the construction or expansion of recreational facilities. Therefore, no impact would occur.

XVI. TRANSPORTATION/TRAFFIC

Potential impacts to transportation and traffic associated with the proposed project were determined from the results presented in the Traffic Technical Memorandum prepared for the proposed project (see Appendix F).

Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less Than Significant Impact. During construction of the proposed project, there would be an increase in vehicle traffic, including construction worker commute trips and haul truck trips, for approximately 30 days during construction. Vehicles and haul trucks would be expected to access the project site and off-site land disposal facility via US 395, United States Route 6, and local roads. It is anticipated that approximately 17 daily truck trips would be required for recycling and waste removal activities and up to 20 construction workers would be on-site on a daily basis for the 30 days during construction. The construction activity would temporarily add approximately 34 trucks and 40 automobile (worker trips) to the area roadways per day for approximately 30 days. However, the existing area roadways are currently operating well below the assumed capacity of the roadways, and would continue operating below the assumed capacity during construction activities for the proposed project. Therefore, the proposed project would result in a less than significant impact during construction.

After remediation is completed, the proposed project would not generate any new trips other than occasional maintenance trips. The maintenance trips would be nominal and the site would operate similar to existing conditions. Therefore, the proposed project would result in a less than significant impact during operation.

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

Less Than Significant Impact. The proposed project would not result in permanent impacts to traffic congestion. As discussed in Section XVI(a) above, the proposed project would not generate additional vehicle trips such that the roadway capacities in the area would be exceeded. Construction activities would be temporary, lasting approximately 30 days. Operation of the proposed project would only require nominal maintenance, and would not result in increased traffic levels over existing conditions. Therefore, the impact to county congestion management agency roads and highways would be less than significant.

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

No Impact. The proposed project would not result in a change to air traffic patterns. As previously discussed, the project site is not located in the vicinity of a public airport or within an airport land use plan. Construction and operation of the proposed project would not generate air traffic. Further, the proposed project would not include any high-rise structures that could act as a hazard to aircraft navigation. No impact would occur.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The proposed project is a remediation project and construction activities would occur entirely within the boundaries of the existing landfill area. No incompatible uses would be introduced into the project site. After construction, the project site would be operated by LADWP similar to existing conditions. Therefore, no impact would occur.

e) Result in inadequate emergency access?

Less Than Significant Impact. No temporary or permanent road closures would occur as part of the proposed project that would restrict emergency access. Additionally, as described in Section XVI(a) above, project-generated traffic during construction would be temporary and minimal. Operation of the proposed project would only require routine maintenance and would not restrict emergency access. Therefore, the impact would be less than significant.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact. The proposed project would not conflict with the adopted policies regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the safety of such facilities. The project site is located entirely within the existing landfill area and does not contain any public roadways. As such, construction activities would not require the removal or relocation of alternative transportation facilities. Therefore, no impact would occur.

XVII. TRIBAL CULTURAL RESOURCES

Would the project:

Potential impacts to tribal cultural resources, as well as details of the Native American contact program are presented in the Cultural Resource Assessment (Appendix C) prepared for the proposed project.

a) Cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

No Impact. As discussed in Section V(a) above, no resources eligible for listing were identified within the project area. During the field survey, one prehistoric

isolate, an obsidian flake, was identified in a disturbed context within the project site. The isolate does not appear to be eligible for listing in the California Register of Historical Resources, and is not considered to be a tribal resource. Therefore, the proposed project would not result in a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in a state or local register of historical resources. No impact would occur.

b) Cause a substantial adverse change in the significance of a tribal cultural resource that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of the Public Resources Code Section 5024.1?

Less Than Significant Impact. As discussed in Section XVII(a) above, no tribal cultural resources were identified within the project area; however, Assembly Bill 52 consultation with the Native American Heritage Commission and Native American contacts in the project area is ongoing. In January 2018, emails and letters were sent to ten Native American contacts classified by the Native American Heritage Commission (NAHC) as potential sources of information related to cultural resources in the vicinity of the project area. The letters advised the tribes and specific individuals of the proposed project and requested information regarding cultural resources in the immediate area, as well as feedback or concerns related to the proposed project. To date, LADWP received one request for consultation from the Bishop Paiute Tribe. On March 13, 2018, LADWP staff met with the Bishop Paiute Tribe's Tribal Historic Preservation Officer (THPO) to discuss project details and potential impacts to cultural resources.

No specific tribal cultural resources have been identified, but the project area is identified as being sensitive for tribal cultural resources. During the construction of the proposed project, unknown tribal cultural resources could potentially be encountered, particularly during ground-disturbing activities. As discussed in Section V(b) above, mitigation measure CR-2, which includes Native American monitoring of project ground-disturbing activities, would be implemented to ensure that impacts to tribal or Native American cultural resources are less than significant.

XVIII. UTILITIES AND SERVICE SYSTEMS

Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. As previously discussed, the proposed project would screen, sort, recycle, and reconsolidate surface and near surface debris within the project area, then install a soil cover system to enhance site drainage. In addition, LADWP would implement structural and nonstructural BMPs and erosion control measures to control runoff from the project site during construction. Additionally, operation of the proposed project would not discharge wastewater. Therefore, the impact would be less than significant.

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

No Impact. The proposed project would screen, sort, recycle, and reconsolidate surface and near surface debris within the project area, then install a soil cover system to enhance site drainage. As such, the proposed project would not increase the amount of water used or wastewater generated and no new or expanded water or wastewater treatment facilities would be required. No impact would occur.

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

No Impact. The proposed project would screen, sort, recycle, and reconsolidate surface and near surface debris within the project area, then install a soil cover system to enhance site drainage. A soil cover would be constructed over the reconsolidated waste prism and existing landfill to enhance drainage conditions and to reduce the potential for future litter production. The soil cover grades would match current grades and be constructed to provide positive drainage off the cover system. Additionally, revegetation of the soil cover would help stabilize the soils from wind and stormwater runoff erosion. As such, the proposed project would not increase the amount of stormwater generated during either construction or operation. Therefore, no new or expanded stormwater drainage facilities would be required. No impact would occur.

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

No Impact. No new structures or facilities would be constructed requiring the use of potable water. The proposed project involves the remediation of the project site through waste reconsolidation, landfill cover, final grading, and re-seeding. Therefore, no additional water supplies would be needed with the proposed project's implementation, and no impact would occur.

e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. No new structures that would generate wastewater would be constructed or operated as part of the proposed project. Therefore, implementation of the proposed project would not result in new demand for wastewater treatment. No impact to wastewater treatment capacity would occur.

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

Less Than Significant Impact. The proposed project would remediate the project site through waste reconsolidation of debris, landfill cover, final grading, and re-seeding within the project area. The proposed project would screen, sort, recycle, and reconsolidate surface and near surface debris within the project area, which is comprised of nearly the entire landfill. Surface and near surface

waste that could not be recycled would be reconsolidated over the existing landfill area. Wastes from illegal dumping have been periodically reconsolidated to a series of north-south trending berms at the site. Illegally dumped wastes from the soil berms would be sorted to separate recyclables, wastes that are not readily compactible (i.e. tires, large bulky wastes, etc.), and wastes to be reconsolidated on the existing landfill. Recyclables and wastes that are not readily compactible would be hauled to appropriate permitted facilities for final disposal. Recyclables and residual wastes would be hauled to the appropriate permitted facility in accordance with county and State requirements.

Approximately 30,400 cubic yards of waste, including 28,000 cubic yards in the soil berms and 2,400 cubic yards in the landfill would be reconsolidated. It is estimated that approximately 30 percent (8,400 cubic yards) of this material excavated from the soil berms could be recycled. The remaining 22,000 cubic yards, including 3,000 cubic yards of additional surface waste from the site, would require reconsolidation for a total of approximately 25,000 cubic yards.

Operation of the proposed project would generate minor amounts of debris and vegetation that would be removed during routine maintenance activities. However, the amount of debris and vegetation removed would be minimal and maintenance would occur on an as-needed basis. Therefore, impacts to solid waste disposal during construction and operation of the proposed project would be less than significant.

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

Less Than Significant Impact. The proposed project would comply with federal, State, and local statutes and regulations related to solid waste. As discussed in Section XVIII(f) above, waste and debris removed during construction of the proposed project would be recycled or disposed of in accordance with existing federal, State, and local regulations. Therefore, impacts to solid waste disposal for the proposed project would be less than significant.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE

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

Less Than Significant Impact With Mitigation Incorporated. Results of the field survey conducted by LADWP verified that suitable bird nesting habitat is absent from the project site, although the site does provide foraging opportunities for birds. In order to minimize potential impacts to birds, the implementation of mitigation measure BR-1 listed in Section IV(a) would be required. With implementation of mitigation measures BR-1, impacts to biological resources would be less than significant.

A cultural resources records search indicated that three pedestrian cultural resource investigations were previously conducted within a 0.5-mile radius of the project site. During the records search, a total of 6 previously recorded cultural resources were identified within 0.5 miles of the project site. None of these resources occurred within the project site. A historic component of the project site consists of refuse deposited between the 1940s and the present. In addition, a historic-age irrigation ditch was observed during the field survey, at the base of the ridge, just within the project site boundary. However, these resources do not meet the criterion for eligibility eligible for inclusion in the California Register of Historical Resources. In addition, the site has been heavily impacted by recent recreational use and illegal dumping. The proposed project would remove debris from the irrigation ditch, but would not otherwise impact this resource. As such, less than significant impacts would occur.

During the cultural resources field survey, one prehistoric isolate, an obsidian flake, was identified in a disturbed context within the project site. The isolate does not appear to be eligible for listing in the California Register of Historical Resources. Therefore, the proposed project would not cause a substantial adverse change in the significance of an archaeological resource. Although no significant surface evidence of archaeological resources was identified during the survey, there is potential for unknown subsurface resources to be encountered during ground-disturbing construction activities. As such, mitigation measure CR-1 listed in Section V(b) would be required to ensure that impacts would be less than significant.

No paleontological resources have been previously encountered during ground disturbing activities, including during maintenance activities at the project site. Therefore, the proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature. Compliance with CEQA Guidelines Section 15064.5(f) and other existing policies would ensure that the impact to paleontological resources would be less than significant.

There are no known cemeteries located within the project vicinity. Therefore, human remains are not expected to be encountered. However, in areas where Native American cultural materials may be encountered during ground disturbance, the implementation of mitigation measure CR-2 listed in Section V(d) would ensure impacts to human remains would be less than significant.

b) Does the project have environmental effects that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant 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. As discussed in Section III(c) above, the proposed project would generate additional air pollutant emissions during constructions; however, this increase would be short term and would not exceed the thresholds of significance. Therefore, the impact to air quality would not be cumulatively considerable.

As discussed in Section VII(a) above, GHG emissions contribute to the global condition known as the greenhouse effect. Because this is an issue that is by its

very nature cumulative, thresholds of significance and climate reduction strategies have been established. The proposed project would generate short-term emissions of GHGs during construction, but virtually no emissions during operations. The emissions generated during construction would be far below the established threshold of significance. The cumulative impact would be less than significant.

As discussed in Section XVI(a) above, project-generated traffic would temporarily increase vehicle traffic in the project area for approximately 30 days during construction. However, the proposed project would not generate additional vehicle trips such that the roadway capacities in the area would be exceeded. The haul route roadway segments would continue to operate well under capacity during construction activities. As such, the cumulative impact would be less than significant.

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

Less Than Significant Impact. The analysis presented in this document does not identify any environmental effects with the potential to adversely impact humans. The primary objectives of the proposed project are to reduce existing and future exposure risks to public health, minimize the potential for future illegal waste disposal at the project site, and to stabilize existing wastes and comply with state regulations. Impacts would predominantly be temporary in nature driven by construction activities. As such, the proposed project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. Therefore, the impact would be less than significant.

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SECTION 4
CLARIFICATIONS AND MODIFICATIONS

The following clarifications and modifications are intended to update the Draft MND in response to the comments received during the public review period. These changes to the Draft MND constitute the Final MND, to be presented to the City of Los Angeles Board of Water and Power Commissioners for adoption and project approval. None of the changes to the Draft MND would require recirculation. Revisions made to the Draft MND have not resulted in new significant impacts, nor has the severity of an impact increased. None of the CEQA criteria for recirculation have been met, and recirculation of the Draft MND is not warranted.

The changes to the Draft 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. All of the changes described in this section have also been made in the corresponding Final MND sections. Please refer to Appendix G, Response to Comments, for referenced comment letters and corresponding comments.

Final MND Page	Clarification/Revision
iii	*An addition has been made to Acronyms and Abbreviations, on page iii of the MND, to include the California Department of Toxic Substances Control (DTSC).*

dBA	A-weighted scale
DTSC	California Department of Toxic Substances Control
GHG	greenhouse gas Street Wells

3-17 *In response to comment 1-2, additional information has been added to Section VI, Geology and Soils Question (a)(iii) on page 3-17 of the MND to provide further clarification regarding the groundwater depth at the project site.*

Less Than Significant Impact. The Owens Valley is a basin surrounded by mountain ranges where alluvium has been deposited by fluvial action. Water runoff velocities have been sufficiently slow to allow accumulation of silts and fine sands on the valley floor. The groundwater beneath the valley floor is shallow enough to suggest potential liquefaction concerns.[16] However, LADWP conducted further review and ran a groundwater surface elevation model using surface elevation data and data from the closest monitoring wells to the project site. As shown in Figure 6, the results show that the estimated groundwater depth within the Brockman Landfill site is greater than 45 feet and therefore, would not be an area for liquefaction. Additionally, as previously discussed, the proposed project does not include any habitable structures. As such, the proposed project would not expose people or structures to adverse effects, including risk of loss, injury, or death associated

with seismic-related ground failure, including liquefaction. Therefore, impacts would be less than significant.

3-18 *A new figure (Figure 6 Groundwater Depths at Project Site) depicting the groundwater depth at the project site based off of LADWP groundwater modeling has been included in Section VI, Geology and Soils on page 3-18 of the MND.*

3-20 *Text changes have been made to the third paragraph of Section VI(c) on page 3-20 of the MND. The change clarifies the groundwater depth at the project site to be greater than 45 feet to reduce the potential for liquefaction and lateral spreading.*

As discussed in Section VI(a)(iii) above, the groundwater beneath the ~~Owens Valley floor is shallow enough to suggest potential liquefaction concerns; however,~~ project site is estimated to be greater than 45 feet. Additionally, the proposed project involves minor construction activities~~,~~ and does not include the construction of any new habitable structures. Therefore, less than significant impacts from lateral spreading would occur.

3- 23-24 *In response to comments 1-3 and 1-4, modifications have been made to Section VIII, Hazards and Hazardous Materials on page 3-35 to provide additional clarification as to the history of the project site and its classification as a solid waste disposal site.*

VIII. HAZARDS AND HAZARDOUS MATERIALS

The project site has been identified by CalRecycle as a pre-regulation burn dump, all of which were phased out in the early 1970s to meet new air quality regulations. Burn dump sites are typically classified as solid waste disposal sites and are inspected by the local enforcement agency. Although the prescriptive cover standards of the California Code of Regulations Title 27 does not apply for pre-regulation sites, the local enforcement agency may apply certain closure regulations on an as-needed basis, per Section 21100 for the protection of public health and safety and the environment. The local enforcement agency determined that the project site was out of compliance due to exposed waste, as such, required a corrective measure that would protect public health and safety. Because these sites were created prior to regulations, landowners are required to maintain state minimum standards at these locations.

In addition, soil samples were analyzed for metals by EPA 6010B using deionized water to test the solubility of metals under existing conditions. The deionized water simulates stormwater conditions leaching through the waste. The data shows that under existing conditions, it is unlikely that metals would leach and impact groundwater or surface water. Please note that metals concentrations obtained by EPA 6010B – waste extraction test – soluble threshold limit concentration (STLC) uses an acid to simulate reducing conditions for evaluating options for disposal to an appropriate facility for clean closure.

The proposed project would meet the state minimum standards for landfills of this type through recycling, waste reconsolidation, grading, placement of soil cover, and incorporation of drainage and erosion control features that would also benefit water quality similar to other burn dump projects recently completed, including the Old Red Bluff Landfill in Tehama County and Mira Loma Landfill in Riverside County. Only certain areas of exposed wastes would be relocated in other waste areas to improve drainage and slope features. Similar to the Old Red Bluff Landfill, the site is designated as open space and no sensitive land uses are proposed. Clean closure of the site is not anticipated.

CalRecycle has consulted with the California Department of Toxic Substances Control (DTSC) regarding the proposed project. DTSC concurred with CalRecycle's proposed remediation of the facility given its site specific conditions and land use and declined further review and guidance on the design on the project.

3-24 *Text changes have been made to revise California Department of Toxic Substances Control to the acronym DTSC for consistency purposes.*

Less Than Significant Impact. Implementation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The proposed project would remediate the project site through waste reconsolidation of debris, landfill cover, final grading, and re-seeding within the project area. Scattered surface and near-surface wastes and debris would be collected, placed within the existing landfill area, and subsequently capped with clay and soil. Covering the site wastes with a soil cover would help reduce the potential for scavenging, direct human contact, vectors, and wind-blown or stormwater runoff transported litter. Construction activities would be temporary in nature and in addition to the transport of landfill debris and wastes, would involve the limited transport, storage, use, and disposal of hazardous materials. Such hazardous materials could include on-site fueling/servicing of construction equipment, and the transport of fuels, lubricating fluids, and solvents. Recyclables and residual wastes would also be transported to the appropriate permitted facility. These types of materials are not acutely hazardous, and all storage, handling, and disposal of these materials are regulated by the ~~California Department of Toxic Substances Control~~ DTSC, United States Environmental Protection Agency, the Occupational Safety & Health Administration, the Inyo County Fire Department, and the Inyo County Health Department. The transport, use, and disposal of construction-related hazardous materials would occur in conformance with applicable federal, State, and local regulations governing such activities. Therefore, the short-term construction impact would be less than significant.

3-28 *In response to comment 1-4, modifications have been made to the third paragraph of Section IX(a), Hydrology and Water Quality on page 3-28 of the MND to provide additional clarification to the project site's classification as a solid waste disposal site and provide results from a stormwater leaching simulation performed with project soil samples.*

As discussed in Section VIII above, soil samples were analyzed for metals by EPA 6010B using deionized water to test the solubility of metals under existing conditions. The deionized water simulates stormwater conditions leaching through the waste. The data shows that under existing conditions, it is unlikely that metals would leach and impact groundwater or surface water. Please note that metals concentrations obtained by EPA 6010B – waste extraction test – soluble threshold limit concentration (STLC) uses an acid to simulate reducing conditions for evaluating options for disposal to an appropriate facility for clean closure.

Furthermore, LADWP would coordinate with the Lahontan Regional Water Quality Control Board to obtain a Waste Discharge Requirement. In addition, LADWP will obtain a Statewide Construction Storm Water Permit and the proposed project would implement structural and nonstructural BMPs and erosion control measures. As discussed in Section 1.6 above, these measures may include, but not be limited to, minimizing the extent of disturbed areas and duration of exposure, retaining sediment within the construction area, as well as the use of silt fences, and temporary soil stabilization as necessary. Implementation of the structural and nonstructural BMPs would reduce sediment-laden runoff, prevent the migration of contaminants to and within surface waters, and ensure that stormwater discharges would not violate applicable water quality standards. Therefore, short-term construction impacts on water quality would be less than significant.

SECTION 5
RESPONSE TO COMMENTS ON THE DRAFT IS/MND

Introduction

The Brockman Landfill Remediation Project Initial Study/Mitigated Negative Declaration (IS/MND) was distributed on July 19, 2018, for public review pursuant to the California Environmental Quality Act (CEQA) and its implementing guidelines. The public review period concluded on August 20, 2018. The IS/MND was distributed to interested or involved public agencies and organizations for review. The IS/MND was also made available for general public review at the following locations: LADWP Environmental Affairs Division (111 North Hope Avenue, Room 1044), LADWP (300 Mandich Street, Bishop), and Bishop Branch Library (210 Academy Avenue, Bishop). In addition, an electronic version of the IS/MND was made available on the LADWP website at: http://www.ladwp.com/envnotices. No public meeting was held.

During this public review period, a total of three comment letters or emails were received. Responses to comments that address environmental issues in the IS/MND are included in the following pages. No substantive changes have been made to the IS/MND. A Mitigation Monitoring and Reporting Program (MMRP) will be prepared for this project.

Responses to Comments That Address Environmental Issues in the IS/MND

The written comment letters received on the IS/MND are listed in Table 1 below. Each letter (or email) has been assigned a number code, and individual comments in each letter have also been coded to facilitate responses. For example, the letter from the Lahontan Regional Water Quality Control Board is identified as Comment Letter 1, with comments noted as 1-1, 1-2, etc. Copies of each comment letter are provided prior to the response to each letter. The comments and associated responses are arranged by the date of receipt of the comment letter. The individual comments in the letters have been numbered and are referred to in the responses that directly follow the comment 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.

Table 1 List of Written Comment Letters Received on the IS/MND

Letter #	Agency/Organization/Individual	Date	Page # of Response
1	Lahontan Regional Water Quality Control Board *Signed: Jeffrey S. Fitzsimmons, PG*	August 20, 2018	5-4
2	Office of Planning and Research State Clearinghouse and Planning Unit *Signed: Scott Morgan*	August 21, 2018	5-9
3	Individual: Bill Allbright	August 23, 2018	5-12

CALIFORNIA Water Boards

EDMUND G. BROWN JR. GOVERNOR

MATTHEW RODRIQUEZ SECRETARY FOR ENVIRONMENTAL PROTECTION

Lahontan Regional Water Quality Control Board

August 20, 2018

File: Environmental Doc Review
Inyo County

Department of Water and Power the City of Los Angeles
Wastewater Quality and Compliance Division
111 North Hope Street, Room 1213
Los Angeles, CA 90012
Christopher.Lopez@ladwp.com

Comments on the Initial Study and Mitigated Negative Declaration for the Brockman Landfill Site Remediation Project, Los Angeles Department of Water and Power, Inyo County

Water Board staff received an Initial Study/Mitigated Negative Declaration (IS/MND) for the above referenced project (Project), dated July 2018, from the City of Los Angeles Department of Water and Power (LADWP), on July 19, 2018. Previously, Water Board staff reviewed a Site Investigation Work Plan (WP) and Conceptual Remediation Alternatives (CRA) for the Brockman Lane Landfill and provided comments by email on September 20, 2017. Water Board staff have reviewed the IS/MND and find the document **does not**: (1) provide a complete description of the geology, hydrogeology, and associated hazards within the vicinity of the site; (2) offer a full characterization of the types of wastes present including all potential constituents of concern (COCs) and their associated concentrations in the soil and groundwater beneath the site; nor (3) provide an accurate delineation of the limits of waste exposed at the surface and buried below the ground surface. Our Comments are outlined below. 1-1

Comments

1. Section VI, Geology and Soils, states "The project site and surrounding area do not contain slopes that would be subject to landslides." Figure 3, titled "The Existing Site Plan" shows a slope that descends from the northern limit of the landfill, towards Bishop Creek and Bishop Creek Canal. Figure 3 is not drawn to scale and contour elevations are illegible. Figures included within the CRA previously submitted to Water Board staff show a portion of contour lines, suggesting the existing slope appears to vary from 2.5 to 1 (2.5:1) to 2:1 (horizontal to vertical), and descends at a minimum of 20 to 25 feet. The United States Geological Survey (USGS) Open File Report 2014-15 (OFR 2014-15) identifies slopes of 20 to 30 degrees located within the Long Valley as being susceptible to seismically induced land sliding. Hydrology data reviewed on the County of Inyo Hydrology website shows groundwater within the vicinity of Brockman Lane Landfill to be present from 0 to 18 feet below the ground surface. Water Board staff request that the potential for liquefaction, lateral spread, and landslide be addressed, and a stability analysis be prepared for the descending slope, including a complete description of the geology and hydrogeology 1-2

beneath the site and in the vicinity. Maps and cross sections should be included in the analysis. 1-2 cont

2. Section VIII, Hazards and Hazardous Materials, indicate site remediation will be achieved through waste reconsolidation, landfill cover, and re-seeding. The IS/MND does not identify the presence of any existing on-site hazardous waste. Upon review of the CRA, Water Board staff commented that "…analytical results contained in the CRA indicates that the wastes identified at the Brockman Lane Disposal site exceed the Solubility Threshold Limit Concentration (STLC) for lead and, therefore, should be handled as a hazardous waste. All remedial action alternatives associated with hazardous wastes must be coordinated with the California Department of Toxic Substances Control [DTSC]." Please clarify whether DTSC has performed a review and/or provided guidance with respect to the concentrations of lead present on this. The IS/MND must identify sufficient mitigation for containing and handling potential on-site hazardous waste or materials. 1-3

3. Section IX, Hydrology and Water Quality, claims the Project will have a "Less Than Significant Impact" with regards to substantially degrading water quality. To date, Water Board staff have not received any additional information regarding adequate waste characterization and addressing the potential for shallow groundwater to exist beneath the site. Based on the limited information that has been provided, Water Board staff recommend that the Brockman Lane Disposal Site be clean-closed. Water Board staff feel that the wastes, if capped and left in-place as proposed, pose a significant threat to water quality. Should additional information be provided to indicate that threat to water quality is low, the capping in place may be a reasonable alternative for closure. In order for us to better understand site characteristics and the potential threat the site poses to water quality, additional site characterization work should include: a) full characterization of the types of wastes present including all potential COCs and their associated concentrations in the soil and groundwater; b) an accurate delineation of the limits of waste exposed at the surface and buried below the ground surface; and c) a geologic and hydrogeology characterization of the site (see Comment No. 1 above). 1-4

Thank you for the opportunity to comment on the IS/MND. If you have any questions regarding this letter, please contact me at (760) 241-4942 (jeffrey.fitzsimmons@waterboards.ca.gov) or Jan Zimmerman, Senior Engineering Geologist, at (760) 241-7376 (jan.zimmerman@waterboards.ca.gov).

Jeffrey S. Fitzsimmons, PG
Engineering Geologist

cc: Dawn Plantz, CalRecycle, (Dawn.Plantz@CalRecycle.ca.gov)
Dave Stuck, DTSC, (Dave.Stuck@dtsc.ca.gov)
California Department of Fish and Wildlife, (AskRegion6@wildlife.ca.gov)
Katherine Rubin, Los Angeles Department of Water and Power (Katherine.Rubin@ladwp.com)

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Comment Letter 1: Lahontan Regional Water Quality Control Board

Response 1-1

This comment includes introductory remarks and provides a summary of concerns regarding the description of existing project site conditions in the IS/MND. These concerns are specified in the following paragraphs of the letter and responses to the specific comments are provided in the following responses.

Response 1-2

The comment requests that the potential for liquefaction, lateral spread, and landslide be addressed and a stability analysis be prepared for the descending slope. As discussed in Section VI(a) through (c) on pages 3-16 through 3-19 of the IS/MND, the project site is located within the Owens Valley and is comprised of alluvial soils. The project site and surrounding area do not contain slopes that would be subject to landslides. The groundwater beneath the valley floor is shallow enough to suggest potential liquefaction or lateral spreading concerns; however, the proposed project involves minor construction activities (i.e., grading and revegetation) and would not expose people or structures to potential adverse effects. In addition, LADWP conducted further review and ran a groundwater surface elevation model using surface elevation data and data from the closest monitoring wells to the project site. The results show that the estimated groundwater depth within the Brockman Landfill site is greater than 45 feet and therefore, would not be an area for liquefaction. Section VI(a)(iii) has been updated to include a figure (Figure 6 on page 3-30) and these results from the model (page 3-29) to further support impacts to liquefaction would be less than significant.

Additionally, as discussed in Section 1.5 Description of the Proposed Project, on page 1-7 of the IS/MND, the existing landfill and the waste reconsolidation area would be graded and then covered with at least two feet of clean fill soils. The soil cover would be moisture-conditioned and compacted and revegetated to minimize erosion and promote positive drainage. The soil cover grades would match current grades (graded to a 3:1 [horizontal:vertical] or approximately 18 degree slope) or shallower. Stormwater best management practices (BMPs) including construction of a drainage ditch and installation of straw wattles on slopes every five vertical feet on contour to establish vegetation would also be implemented to reduce further erosion potential.

Furthermore, the Brockman Landfill Remediation Project is in its preliminary design phase during the CEQA process. As the design plans continue to be refined, the slope stability of the project will be evaluated in the next design phase as part of the Design Report, which will include geological and hydrogeological information, as well as maps and cross-sections as necessary. As discussed in Section IX(a), LADWP would continue to coordinate with the Lahontan Regional Water Quality Control Board to discuss the project and comply with the Waste Discharge Requirement.

Response 1-3

The comment states that the Conceptual Remediation Alternatives Report previously provided to the Water Board staff identified exceedances of lead at the Brockman Lane Disposal site and requests that all remedial action alternatives be coordinated with the California Department of Toxic Substances Control (DTSC) and sufficient mitigation for

containing and handling potential on-site hazardous waste or materials be incorporated into the IS/MND.

CalRecycle has consulted with DTSC regarding the proposed project which would screen, recycle, and reconsolidate surface and near surface debris over existing landfill and cover all wastes (Option 1 in the Conceptual Remediation Alternatives Report) as the best alternative for site remediation. DTSC concurred with CalRecycle's proposed remediation of the facility given its site specific conditions and land use and declined further review and guidance on the design on the project.

Please note that the project site has been identified by CalRecycle as a pre-regulation burn dump, all of which were phased out in the early 1970s to meet new air quality regulations. Burn dump sites are typically classified as solid waste disposal sites and are inspected by the local enforcement agency. Although the prescriptive cover standards of the California Code of Regulations Title 27 does not apply for pre-regulation sites, the local enforcement agency may apply certain closure regulations on an as-needed basis, per Section 21100 for the protection of public health and safety and the environment. The local enforcement agency determined that the project site was out of compliance due to exposed waste, as such, required a corrective measure that would protect public health and safety. Because these sites were created prior to regulations, landowners are required to maintain state minimum standards at these locations.

The proposed project would meet the state minimum standards for landfills of this type through recycling, waste reconsolidation, grading, placement of soil cover, and incorporation of drainage and erosion control features that would also benefit water quality similar to other burn dump projects recently completed, including the Old Red Bluff Landfill in Tehama County and Mira Loma Landfill in Riverside County. Only certain areas of exposed wastes would be relocated in other waste areas to improve drainage and slope features. Similar to the Old Red Bluff Landfill, the site is designated as open space and no sensitive land uses are proposed. Clean closure of the site is not anticipated. Section VIII has been updated to reflect this additional information regarding the project site classification.

Additionally, as discussed in Section 1.5, Description of the Proposed Project, on page 1-7 of the IS/MND, once remediation is completed, the project site would be routinely monitored and maintained to inspect the performance of the soil cover, establishment of vegetation and the potential for soil erosion. Cleanup confirmation sampling would be conducted in areas from which wastes were removed to demonstrate concentrations of metals do not exceed screening levels. As stated in Section 1.6, Construction Schedule and Procedures on page 1-9 of the IS/MND, an appropriate combination of monitoring and resource impact avoidance would be employed during all phases of the proposed project, including implementation of BMPs which include stormwater and erosion control measures.

Response 1-4

This comment requests additional site characterization information be provided to indicate the threat to water quality is low. As discussed in Section 1.3, Project Location and Setting, on page 1-2 of the IS/MND, sample soils collected at the project site analyzed for metals and leachable concentrations of chemical compounds detected lead concentrations that exceeded the human health risk screening levels as defined by the State of California Office of Environmental Health Hazard Assessment and U.S. Environmental Protection Agency. As

such, site remediation as proposed by the IS/MND is recommended to reduce the potential health risks.

Additionally, the limits of landfill (waste exposed at the surface) and the limits of waste (buried below the ground surface) are identified in Figure 3, on page 1-5 of the IS/MND. Figures 3 through 5 have been updated for clarity in the IS/MND.

As discussed in Response 1-2, the project site is located in an area with alluvial soils; however, further groundwater modeling shows that the groundwater at the project site is located at a depth of 45 feet or greater. Additionally, the proposed project would consist of grading and revegetation and would not change the site conditions in a way that would increase the potential for landslide, liquefaction, or lateral spreading impacts.

In addition, soil samples were analyzed for metals by EPA 6010B using deionized water to test the solubility of metals under existing conditions. The deionized water simulates storm water conditions leaching through the waste. The data shows that under existing conditions, it is unlikely that metals would leach and impact groundwater or surface water. Please note that metals concentrations obtained by EPA 6010B – waste extraction test – soluble threshold limit concentration (STLC) uses an acid to simulate reducing conditions for evaluating options for disposal to an appropriate facility for clean closure. Sections VIII and IX(a) have been updated with this additional information.

As discussed in Response 1-3, clean closure of the project site is not anticipated as the site, identified as a pre-regulation burn dump, would meet the required remediation standards for landfills of this type by grading and incorporating drainage and erosion control features as proposed by the project.

Comment Letter No. 2

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

August 21, 2018

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

Subject: Brockman Landfill Remediation Project
SCH#: 2018071037

Dear Christopher Lopez:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on August 20, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

2-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Document Details Report
State Clearinghouse Data Base

SCH# 2018071037
Project Title Brockman Landfill Remediation Project
Lead Agency Los Angeles Department of Water and Power

Type MND Mitigated Negative Declaration

Description Note: Review Per Lead

LADWP proposes to remediate the former Brockman Landfill, a 33.5 acre open area that was used as a disposal site at the north end of the city of Bishop. The goals of the remediation project are to stabilize existing wastes, reduce existing and future exposure risks, and minimize the potential for future illegal waste disposal at the site. Remediation would entail screening, sorting, and recycling of surface and near surface wastes. Waste that could not be recycled would be reconsolidated over the existing landfill area and covered with at least two ft of clean soils. In addition, the project will also include site fencing improvements and signage to restrict access and discourage illegal dumping.

Lead Agency Contact

Name Christopher Lopez
Agency Los Angeles Department of Water and Power
Phone 213 367 3509 **Fax**
email
Address 111 North Hope Street, Room 1044
City Los Angeles **State** CA **Zip** 90012

Project Location

County Inyo
City Bishop
Region
Lat / Long
Cross Streets Brockman Lane and Riverside Rd
Parcel No.
Township 6S **Range** 32E **Section** 26 **Base**

Proximity to:

Highways 395
Airports
Railways
Waterways Bishop Crk
Schools
Land Use OS

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Resources, Recycling and Recovery; Regional Water Quality Control Bd., Region 6 (Victorville); Department of Toxic Substances Control; Native American Heritage Commission

Date Received 07/17/2018 **Start of Review** 07/17/2018 **End of Review** 08/20/2018

Note: Blanks in data fields result from insufficient information provided by lead agency.

Comment Letter 2: Office of Planning and Research State Clearinghouse and Planning Unit

Response 2-1

This is a standard letter from the Office of Planning and Research to the lead agency noting that LADWP has complied with the State Clearinghouse review requirements for the IS/MND. No comment letter was submitted by a State agency. No response to the State Clearinghouse letter is necessary because no issues related to the adequacy of the environmental impact analysis in the IS/MND were raised.

From: Bill Albright
To: Lopez, Christopher
Subject: RE: Brockman Landfill Remediation Study
Date: Thursday, August 23, 2018 11:17:06 AM

Hi Chris

Thanks for the reply. Here are a couple comments to consider

A very important step in landfill cover design is to identify what the cover is expected to do. This may include minimizing leachate production to protect groundwater resources, physical containment of the waste, end land use and aesthetics. The list can be longer, these factors are common.

I understand that there is little concern over leachate production and contamination of groundwater. If so, this leaves physical containment and visual concerns. Implied here is that the cover will remain in place for a very long time, indefinitely. Usually, long-term stability depends on establishment of a self-sustaining plant community, usually some version of the surrounding ecosystem. One concern for this is that the cover soil is of the same, or similar, type to the surrounding soil. Since your borrow source is likely to be quite close this matter should be easy. The remaining concern is that the cover is of sufficient thickness to accommodate the rooting depth of the design plant community. This requires a little thought. There may be someone local or on your staff who is familiar with rooting characteristics. Another approach, my favorite, is to take a backhoe to the site and dig around a few of the existing shrubs and directly measure the root depth. There is really no substitute for data. If your designed cover is of significantly less thickness than the root depth there may be a problem establishing a viable plant community.

3-1

These two issues – soil type and cover thickness – will provide sufficient root depth and soil water storage to make the cover persist over the long term.

Hope this helps in your project. Don't hesitate to contact me if you'd like to discuss

Bill Albright

From: Lopez, Christopher [mailto:Christopher.Lopez@ladwp.com]
Sent: Wednesday, August 8, 2018 3:32 PM
To: Bill Albright <Bill.Albright@dri.edu>
Subject: Brockman Landfill Remediation Study

Hi Bill,

It was nice speaking with you the other day regarding your recommendations for the soil cover design for the Brockman Landfill Remediation Project. I shared your concerns with the project manager, and she provided some clarifications regarding the design:

The project is not proposing to place a clay cap on the landfill, but rather 2' of suitable soil. What

you may be recommending is an alternative to the prescriptive landfill cover designs for post-1988 municipal solid waste landfills. Since Brockman is pre-regulation and a burn dump, this prescriptive clay and equivalent ET cover does not apply. The proposed cover is to provide a protective layer of separation of the burn ash from the public. Water quality is typically not a concern for burn ash as the metals are oxidized and does not leach in a rain water environment. However, if you put burn ash in a landfill that has a reducing environment, the metals have the potential to leach.

I hope this provides some clarification regarding our plans for the soil cover. If you have any additional questions, please feel free to contact me.

Thank you,
Chris

Christopher Lopez
Environmental Planning and Assessment
Los Angeles Department of Water and Power
Phone: 213.367.3509
Email: Christopher.Lopez@ladwp.com

Comment Letter 3: Bill Allbright

Response 3-1

This comment offers recommendations on soil cover and revegetation techniques for long-term stability of the Brockman Landfill Remediation Project. The commenter does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. No further response to this comment is required.

SECTION 6
LIST OF PREPARERS

LEAD AGENCY

Los Angeles Department of Water & Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

PREPARED BY

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

Charles C. Holloway, Manager of Environmental Planning and Assessment
Nadia Parker, Environmental Supervisor
Christopher Lopez, Environmental Project Manager

TECHNICAL ASSISTANCE PROVIDED BY

Fareeha Kibriya, Project Director (AECOM)
Shannon Ledet, Project Manager (AECOM)
Kathalyn Tung, Deputy Project Manager/Environmental Planner (AECOM)
Tisa Rodriguez, Environmental Planner (AECOM)
Vicky Rosen, Environmental Analyst (AECOM)
Isis Amoah, Environmental Analyst (AECOM)
Vamshi Akkinepally, Transportation Planner (AECOM)
Art Popp, Senior Biologist (AECOM)
Marc Beherec, Senior Archaeologist (AECOM)
Andrew York, Principal Archaeologist (AECOM)
Frank Humphries, Archaeologist (AECOM)
Jang Seo, Graphic Artist (AECOM)
Sam Silverman, Air Quality and Noise Manager (Terry A. Hayes Associates)
Anders Sutherland, Air Quality and Greenhouse Gases Analyst (Terry A. Hayes Associates)
Kieran Bartholow, Noise Specialist (Terry A. Hayes Associates)

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